STF-JKA-2-9 Attachment M

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May 23, 2023

Via Electronic Mail
Filed in EPA Docket ID No. EPA-HQ-OAR-2023-0072

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Request for Extension of Comment Period

Dear Administrator Regan:

On May 23, 2023, the U.S. Environmental Protection Agency ("EPA") published a notice of proposed rulemaking in the Federal Register entitled "New Source Performance Standards for Greenhouse Gas Emission From New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions from Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule" ("Proposed Rules"). 88 Fed. Reg. 33,240 (May 23, 2023). That notice established a 60-day deadline for public comment on the Proposed Rules. This letter is being sent on behalf of the Power Generators Air Coalition ("PGen")[1] to request that EPA extend this deadline by an additional 60 days to September 20, 2023.

PGen members own and operate fossil fuel-fired electric generating units (EGUs) that are the subject of the Proposed Rules, and many have resource plans that call for the addition of new "firm" power from fossil fuel generation that are also the subject of this rulemaking. As a result, PGen members have a powerful interest in the Proposed Rules and have been very engaged on these issues with EPA, filing comments with EPA during the pre-proposal stage of this rule[2] and meeting with EPA personnel in Research Triangle Park on November 17, 2022.

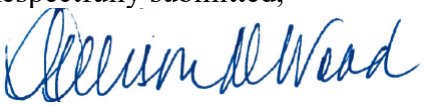
[1] PGen is an incorporated nonprofit 501(c)(6) organization whose members are diverse electric generating companies—public power, rural electric cooperatives, and investor-owned utilities—with a mix of solar, wind, hydroelectric, nuclear, and fossil generation. Our members include leaders in the fundamental transition to cleaner energy that is currently occurring in the industry. PGen and its members work to ensure that environmental regulations support a clean, safe, reliable, and affordable electric system for the nation. Additional information about PGen and its members can be found at https://pgen.org.

[2] Comments of the Power Generators Air Coalition to EPA's Pre-Proposal Non-Rulemaking Docket on Reducing Greenhouse Gas Emissions from New and Existing Fossil Fuel-Fired Electric Generating Units, Docket ID No. EPA-HQ-OAR-2022-0723 (Dec. 22, 2022).

Additional time is necessary for the public to develop meaningful comments on the Proposed Rules. As EPA undoubtedly knows, the Proposed Rules are extraordinarily complex and contain five separate proposed actions: (1) revised new source performance standards (NSPS) for greenhouse gas (GHG) emissions from new fossil fuel-fired stationary combustion turbine electric generating units (EGUs); (2) revised NSPS for GHG emissions from modified fossil fuel-fired steam generating EGUs; (3) emission guidelines for GHG emissions from existing fossil fuel-fired steam generating EGUs; (4) emission guidelines for GHG emissions from existing stationary combustion turbines; and (5) repeal of the Affordable Clean Energy Rule. These proposed rules raise many substantial issues that require thorough analysis. States and affected members of the public are only just beginning to undertake the modeling and analytical work necessary to understand and comment on the Proposed Rules, and they cannot reasonably complete that important work within the current comment period. For that reason, PGen respectfully requests an additional 60 days, until September 20, 2023, to review and prepare comments on the Proposed Rules.

Because PGen members own and operate EGUs that will be subject to the Proposed Rules, the ability to prepare comprehensive comments on these rules is of great importance to PGen. Thank you for your consideration of this request.

Respectfully submitted,



Allison D. Wood
Counsel to the Power Generators Air Coalition

cc: Joseph Goffman, Principal Deputy Assistant Administrator
Christian Fellner, Sector Policies and Programs Division, OAQPS
Lisa Thompson, Sector Policies and Programs Division, OAQPS