***DATE***

EPA Docket Center

U.S. Environmental Protection Agency

Attn: Docket ID No. EPA-HQ-OAR-2013-0495

Mail Code 2822T

1200 Pennsylvania Avenue NW

Washington, D.C. 20460

 Submitted via [www.regulations.gov](http://www.regulations.gov)

Re: Comments on Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units; Proposed Rule, 79 *Fed. Reg.* 1430 (January 8, 2014), Docket ID No. EPA–HQ–OAR–2013–0495-0001

To Whom It May Concern:

***Add Co-op Name*** appreciates the opportunity to comment on the U.S. Environmental Protection Agency’s (EPA) proposed rule addressing new source performance standards (NSPS) for greenhouse gas emissions from electric utility generating units (EGUs) under the Clean Air Act (CAA), *79 Fed. Reg.* 1430 (January 8, 2014). In its proposal, EPA has one standard of performance for fossil fuel-fired electric steam generating units and integrated gasification combined cycle units (IGCC) and another for natural gas-fired stationary combustion turbines. Left unchanged, these standards will drive the power industry to a natural gas only energy strategy. A national energy policy based on one fuel is foolhardy, and unnecessary under the CAA.

EPA has based the standard of performance for new utility boilers and IGCC units on partial implementation of carbon capture and storage (CCS) as the best system of emission reduction (BSER). This proposal virtually ensures that new coal-based generation will be prohibitively expensive and will not be built. CCS is not adequately demonstrated technology. Although CCS holds promise for the future, the technology for electric generation today remains both costly and unproven. EPA should reconsider this proposal and instead reexamine optimized reasonable heat rate efficiencies as possible performance standards for coal-fired EGUs.

We support the proposal to limit the applicability of the proposed NSPS for natural gas combustion turbine EGUs to only units supplying more than 1/3 of potential electric output and more than 219,000 MWh net annual electric output to the grid. Additionally, since simple cycle CTs that are dispatched to maintain grid reliability cannot possibly meet the proposed standard and can require operation exceeding the 219,000 MWh annual cut-off, simple cycle CTs should be exempt from this rulemaking.

***Add Co-op Name*** appreciates the opportunity to provide comments on EPA’s greenhouse gas NSPS for new EGUs. We are an active member of the National Rural Electric Cooperative Association (NRECA) and fully support the more expansive comments submitted by NRECA in this rulemaking.

Sincerely,

***Name***

***Co-Op Name***