



LOCAL 15

INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS

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October 13, 2020

Ms. Barbara Flynn Currie, Chairman
Illinois Pollution Control Board
1021 N. Grand Avenue East
PO Box 19274
Springfield IL 62994

Dear Chairman Currie:

The International Brotherhood of Electrical Workers Local 15 is committed to our members and the communities they reside in as well as the longevity of NRG's Powerton, Waukegan, Joliet and Will County plants that employ our members. I want to thank the board for considering some of the factors surrounding how this proposed rule would impact our members.

We encourage the board to craft a rule that relies on science and data at each specific site and strikes a pragmatic balance that considers the cost of coal ash management. Companies, like NRG, cannot pass regulatory cost onto ratepayers and instead those cost must be absorbed as part of the annual revenue.

We understand the ash, a byproduct of burning coal to generate electricity is being stored at the NRG power plant sites in impoundments. We encourage the board to develop an ash rule that empowers the Illinois Environmental Protection Agency with broad authority to evaluate each site on a case-by-case basis and consider many options for the closure of impoundments.

A narrow rule to close by removal wouldn't necessarily be the best option for the residents in the surrounding communities. Hauling away hundreds of truckloads of ash for many years would mean more traffic, road wear and increased public safety risks. We also believe the increased truck traffic would be detrimental to the surrounding communities as compared other possible closure options that are equally or more effective with much less disruption to our communities.

We appreciate your attention to forming a rule that doesn't arbitrarily prefer one closure method over another.

Respectfully,

Terry McGoldrick
President
International Brotherhood of Electrical Workers Local 15