

ORIGINAL

**John Therriault - IL AFL-CIO Public Comment - Ameren's Petition for Variance**

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**From:** "Beth Spencer" <BethS@ilaf-cio.org>  
**To:** <therriaj@ipcb.state.il.us>  
**Date:** 12/22/2008 11:00 AM  
**Subject:** IL AFL-CIO Public Comment - Ameren's Petition for Variance  
**CC:** "Michael Carrigan" <MichaelC@ilaf-cio.org>

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Pollution Control Board

John:

Per our phone conversation, please find attached Public Comment from the Illinois AFL-CIO, the IBEW and the UMWA in support of Ameren's Petition for Variance.

Any questions please feel free to contact me or Michael T. Carrigan, president, IL AFL-CIO at 217.544.4014.

Thank you,

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*PC#2*  
*PCB09-21*

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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DEC 22 2008

STATE OF ILLINOIS  
Pollution Control Board

AMEREN ENERGY GENERATING )  
COMPANY, AMERENENERGY )  
RESOURCES GENERATING COMPANY )  
AND ELECTRIC ENERGY, INC., )

Petitioners, )

v. )

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )

Respondent. )

PCB – 09-21  
(Variance – Air)

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PLEASE TAKE NOTICE that the Illinois AFL-CIO, International Brotherhood of Electrical Workers (IBEW) and the United Mine Workers of America (UMWA) File Public Comment (as follows)

Public Comment of Michael T. Carrigan, president, Illinois AFL-CIO

In response to Ameren's Petition for Variance filed with the Illinois Pollution Control Board, we wish to express our support for approval of this variance. It is our understanding that the relief Ameren requests is very narrow and does not seek to undo its environmental commitments as suggested by the public comments recently filed by certain environmental groups. The facts are that Ameren was the first company to come forward to reach an agreement with the state to reduce mercury emissions. Ameren was actually one of the chief architects of Illinois' multi-emission environmental compliance strategy, working closely with State officials.

In addition, the company's strong record of significant emissions reductions indicates Ameren is as committed as ever to further reducing emissions from its power plants.

This fall, Ameren sought to move the timeframe for installing new controls for two reasons: (1) regulatory uncertainty created by the federal courts' overturning key federal regulations and (2) the financial crisis gripping our nation. Almost every industry sector has been affected by this crisis--the auto and banking industries are only the most public examples. Financial publications have also pointed to the serious problems utility companies face because of their reliance on short-term financing to manage their daily operations. Ameren has stated in news releases, financial documents and in its discussions with the financial community that the company has had great difficulty accessing capital markets to support its operations and refinance debt.

If granted, this variance would allow Ameren to defer -- not cancel --approximately \$500 million of environmental capital expenditures, giving the corporation breathing room to manage through this crisis.

It is vital that members of the Board remember that Ameren companies for more than a century have provided good jobs and stable employment to thousands of Illinoisans. Taxes paid by these companies are critical to the support of schools, emergency response organizations and city governments of dozens of communities across the state. It would be irresponsible for the Board to ignore the realities of what is occurring in the economy and to push this stable company into financial distress.

Ameren has stated that it is not reneging on its emissions reduction agreement and, in fact, has agreed to more stringent emission requirements than the original regulation. Over the next

decade, Ameren intends to install seven to eight scrubbers at its Illinois plants---these projects will provide hundreds of permanent and contract jobs to unionized workers. These are good-paying jobs our state desperately needs in these economically trying times.