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**JUL 05 2012**

**STATE OF ILLINOIS  
Pollution Control Board**

July 3, 2012

Members of the Illinois Pollution Control Board  
C/o John Therriault, Assistant Clerk  
Illinois Pollution Control Board  
100 W. Randolph Street, Ste. 11-500  
Chicago, IL 60601-3218

*Pc# 133*

Re: Ameren's Petition for Variance from the Illinois Multi-Pollutant Standard: PCB 12-126

Dear Members of the Illinois Pollution Control Board:

On behalf of the Illinois AFL-CIO, I wish to express our support for approval of this request for variance. Ameren Energy Resources (AER) is a key employer of unionized workers and the economic benefits AER provides the State of Illinois and local communities is critical during these economically trying times.

As we understand the request, AER seeks to move the timeframe for completing the installation of scrubber equipment at the Newton Power Plant in part due to the economic crisis felt by industry across the country, but also in part due to circumstances unique to Illinois power generators. The completion of the scrubber is necessary in order for AER to meet sulfur dioxide (SO<sub>2</sub>) emissions rate provisions of the state only Multi-Pollutant Standard (MPS). We believe it is important to note that AER is not seeking relief from any other components of the MPS. The recent unforeseen and dramatic drop in natural gas prices coupled with historic low power market prices have exacerbated conditions for Illinois power generators operating in a deregulated power market and subject to stricter emissions standards than competitors in neighboring states. Illinois companies like AER are now disproportionately bearing costs attributable to these unexpected events.

AER has begun construction necessary to install the necessary pollution control equipment at Newton Power Plant, but has stated publicly that it simply cannot afford to complete the project at this time. If granted, this variance would allow AER to keep plants open and defer significant environmental capital expenditures associated with completing the scrubber. Given time to recover from the current crisis, AER states it will be able to achieve all applicable emission limits by the end of the requested variance term. If AER's past record of significant emissions reductions is any indication of its commitment, we are confident that the company will make every effort to further reduce emissions from its power plants.

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It is essential that members of the Illinois Pollution Control Board remember that the AER family of companies has provided good jobs and stable employment to thousands of Illinois citizens for over a century. These companies pay taxes critical to supporting the schools, emergency response organizations and city governments in dozens of communities across the state. While we understand how essential it is to meet state pollution control standards, the variance procedure is available to accommodate precisely the situation AER faces now: an arbitrary and unreasonable hardship.

Considering the closures of the Hutsonville and Meredosia plants in the past year and AER's agreement to voluntarily meet a lower emission rate during the variance period, AER's request will have an overall environmental benefit. With this in mind, Illinois cannot afford to experience additional closures and lose any more jobs and tax revenue if AER is not granted this variance. Please recognize the support of AFL-CIO for approval of this variance.

Sincerely,

A handwritten signature in black ink, reading "Michael J. Carrigan". The signature is written in a cursive style with a large, sweeping initial "M".

President  
Illinois AFL-CIO