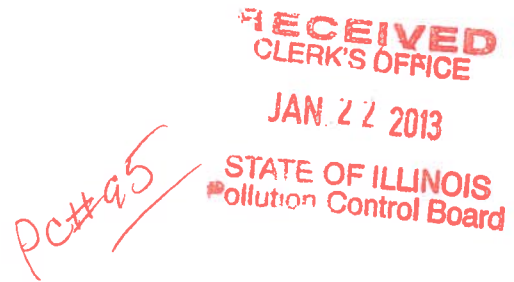




January 17, 2013

Mr. John Therriault, Assistant Clerk  
Illinois Pollution Control Board  
100 W. Randolph St., Suite 11-500  
Chicago, IL 60601-3218



**Re: Support for Midwest Generation's Requested Variance, Docket No. PCB 13-24**

Dear Mr. Therriault:

On behalf of the Illinois Manufacturers Association and our nearly 4,000 member companies and facilities throughout the State of Illinois, I respectfully request that the Illinois Pollution Control Board support Midwest General's request for short-term relief from state regulations governing emissions at its coal-fired power plants.

Illinois manufacturing companies employ 600,000 workers and contribute the single largest share – 12.4 percent – of the state's Gross Domestic Product. Manufacturing companies depend on safe, reliable, and efficient sources of energy and Midwest Generation plays a critical role in supplying the energy that is essential for their success. Illinois is blessed to have a diverse supply of electricity and we hope that this continues to be the case as it is one way in which our members can protect themselves from spikes in their costs.

Midwest Generation is a company that conducts itself with a great deal of integrity and responsibility to stakeholders -- whether employees, policymakers or communities surrounding its plants. Its request for a variance is straightforward and reasonable and should be granted by IPCB.

The company is simply seeking permission to invest less than it otherwise would have during just two years of the State's 12-year emissions reductions program. The company is not looking to duck its responsibilities; it merely wants to defer some capital expenses for environmental improvements as it goes through a financial restructuring.

**Even if granted the variance, Midwest Generation would still hit the state-mandated emissions targets by the end of the program in 2019.** And, its emissions from 2013-16 would be less than projected when current state regulations were adopted in 2007. In other words, the request would result in lower emissions than currently required.

Midwest Generation is a great corporate and philanthropic partner that contributes a great deal to the Illinois economy. It provides 850 good, high-paying jobs for its employees (65 percent union) and hundreds more for building and construction trade union members hired for special projects in the plants. The company purchases hundreds of millions of dollars of goods and services from Illinois companies and pays nearly \$5 million in property taxes to support local schools and municipal services. It has always shown a strong commitment to corporate citizenship through involvement in community, civic and charitable organizations.

Finally, there is an issue of fundamental fairness. Just last September, the Pollution Control Board granted Ameren a variance that was similar in many respects to what Midwest Generation seeks. In fact, the major difference is that Midwest Generation's request is more limited in scope than Ameren's.

I respectfully request that the Board approve Midwest Generation's request.

Thank you for considering and registering my comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Denzler', with a stylized flourish at the end.

Mark Denzler  
Vice President & COO