



Illinois Manufacturers' Association

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January 4, 2018

Mr. Don Brown, Clerk
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph Street
Chicago, Illinois 60601

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STATE OF ILLINOIS
Pollution Control Board

RE: Public Comment in **Support** of the Illinois Environmental Protection Agency's Filing to Revise the Multi-Pollutant Standards, Docket Number 18-20

Dear Honorable Members of the Illinois Pollution Control Board:

On behalf of the Illinois Manufacturers' Association (IMA) and our nearly 4,000 member companies, I urge you to approve the Illinois EPA's proposed revision the state's Multi-Pollutant Standards (MPS) currently pending before the Board. Adopting this change will be better for the environment and Dynegy by creating one, unified structure for its eight downstate plants. Approval is critical for the energy-intensive manufacturing sector that relies on safe, efficient, and affordable energy.

The IMA supports strong environmental regulations and protections. We also believe that these measures should be efficient, as simple as possible, and fair. The current standards reflect a legacy structure that no longer make sense, given the common ownership of the plants.

In fact, the state's regulations are out of line with the preferred approach of the U.S. EPA and create additional burdens for oversight by the state. That is why it is in everyone's interest to enact new streamlined standards that establish a strict, statewide cap on total allowable emissions.

The proposed rule caps allowable sulfur dioxide (SO₂) and nitrogen oxide (NO_x) emissions from the Dynegy fleet of plants below the limits set by the current MPS agreements. The total allowable SO₂ emissions would be 17% lower and NO_x emissions would be 24% lower than currently permitted.

The new cap would be on top of the significant reductions and investments that have already been implemented. Dynegy invested \$2 billion in environmental controls over the past several years and the results speak for themselves – a 90% reduction in SO₂ emissions, and significant reductions in NO_x and other emissions.

The rule change will continue this trend while simultaneously providing Dynegy with operational flexibility for its Illinois' fleet, increasing the likelihood that the plants can remain economically viable. The economic impact of your decision should not be overlooked.

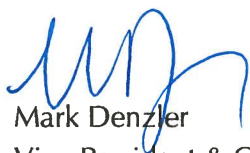
The plants covered by this rule change have an annual payroll in excess of \$100 million and provide employment to over 1,000 individuals. They pay tens of millions in annual property taxes, benefitting local schools and emergency services.

Indirectly, Dyengy's plants support innumerable businesses throughout Illinois. Their direct spending on materials, supplies and services and payroll impact of their workforce provide over \$2 billion in economic benefit to Illinois' economy.

There are also tremendous economic benefits to maintaining a healthy, competitive and vibrant generation market in Illinois. The IMA's members benefit from the availability of reliable and efficiently produced electricity. These plants are a critical component of the state's energy mix and have operations, customers and economic impact in 80 of Illinois' 102 counties.

All of these reasons make clear, the rule change is a benefit to Illinois' environment and economy. The proposed rule should be approved and the IMA urges your support.

Best,



Mark Denzler
Vice President & COO