



ILLINOIS CHAMBER
OF COMMERCE

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

RE: Public Comment in **Support** of the Illinois Environmental Protection Agency's Filing to Revise the Multi-Pollutant Standards, Case Number R2018-020

Dear Honorable Members of the Illinois Pollution Control Board:

On behalf of the Illinois Chamber of Commerce, I write the Board to express our support for the Illinois EPA's proposed revision to the Multi-Pollutant Standards (MPS) pending before the Illinois Pollution Control Board. This change is good for the state's economy, while simultaneously strengthening environmental standards to the benefit of citizens – and we ask you to approve the revision.

The Chamber believes it is important to have a streamlined, predictable and fair regulatory environment. The proposed rule seeks to make the MPS standards more efficient through a statewide cap, consistent with the U.S. EPA's preferred approach to state regulation.

The proposed rule caps allowable emissions from Dynegy's fleet at levels significantly lower than currently permitted. Compared to the current regulations, IEPA estimates that total allowable sulfur dioxide emissions would be 17% lower and nitrogen oxide emissions would be 24% lower.

These reductions would be on top of the significant achievements in emission reduction and investments already made by Dynegy. Approximately \$2 billion has been invested in Dynegy's Illinois fleet for emission control. As a result, over the last two decades sulfur dioxide emissions have been reduced 90% along with significant reductions in other emissions. All other limits established to protect national ambient air quality and health-based standards would remain unchanged.

It is important to remember that the original MPS rules were created when the plants in the fleet were owned by separate owners; today they are all owned by Dynegy and it doesn't make sense to have different rules for different plants under common ownership. Giving this company the ability to manage its Illinois' fleet to a single standard will

provide them with flexibility they need, and provide Illinois with proven environmental benefits.

The Chamber wants to reiterate to the Board the significance these plants play in central and southern Illinois' economy. The plants covered by this rule directly employ over 1,000 individuals with an annual payroll in excess of \$100 million.

The plants pay tens of millions in property taxes annually, supporting local schools and emergency services. The ripple effect of Dynegy's spending on materials services, and supplies and the indirect impact of their payroll generates over \$2 billion in benefits to Illinois' economy.

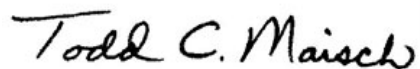
These plants also play a vital role in maintaining downstate Illinois' energy mix and security. It is important that the state provide flexibility to allow an efficient, reliable generator of power to operate. All consumers, manufacturers and businesses benefit from a robust and competitive generation market. This change increases the likelihood that the plants will remain economically viable.

Simply put, these plants are vital economic infrastructure for our state. It is of the upmost importance to enact this rule change, allowing Dynegy to operate its fleet in an efficient, flexible and safe manner.

To the Chamber this is not a choice between the environment and the economy. This is an opportunity to do something that maintains tough environmental standards – including lower allowable emissions – while strengthening the outlook for the state's economy.

We urge your approval of the rule change.

Sincerely,

A handwritten signature in black ink that reads "Todd C. Maisch". The signature is written in a cursive style and is positioned to the left of a vertical line.

Todd Maisch
President & CEO
Illinois Chamber of Commerce