



Over A Century Strong

January 11, 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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 CLERK'S OFFICE

JAN 18 2018

STATE OF ILLINOIS
 Pollution Control Board

PC 1808

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,

I am the Business Manager of International Brotherhood of Electrical Workers (IBEW) Local Union 702. Please consider this letter as my support for the Illinois EPA's proposed revision to the state Multi-Pollutant Standards (MPS), currently pending before the Illinois Pollution Control Board. The rule represents a win-win for citizens of Illinois, strengthening both the state environmental standards and the economics of a vital downstate Illinois economic resource. On behalf of IBEW Local Union 702, I ask you to approve the revision.

There are clear economic and environmental benefits to revising this rule. 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. Under the MPS proposal, the IEPA estimates that allowable annual emissions of SO₂ would be 17% lower than under the current rule, while NO_x emissions would be 24% lower. The MPS rules were created when the plants were owned and operated by separate owners, so it is simply good policy to bring all the plants under a single, consistent rule. This rule revision streamlines regulations, which benefits Illinois businesses and residents.

I attest, Dynegy has demonstrated its commitment to Illinois and the environment. Approximately \$2 billion has been invested in the Dynegy fleet for emission control. This allows Dynegy to meet the tighter allowable caps in the MPS proposal and build on the trend of lower emissions from Dynegy's Illinois fleet over the last two decades – an SO2 reduction of 90%, with significant reductions in NOx and other emissions.

Another consideration relates to local jobs and the support of central and southern Illinois communities. Dynegy's downstate facilities employ over 700 highly skilled, well-paid union members, some of which are IBEW Local 702 members, and provide hundreds of part-time building trade's jobs for plant maintenance and upgrades. Dynegy supports over 8,000 direct and indirect jobs in Illinois and generates over \$2 billion in benefits to the Illinois economy, directly impacting 80 of the state's 102 counties. The company also pays millions of dollars in property tax payments, supporting local schools and emergency services.

For the sake of individuals, families, communities and businesses across Central and Southern Illinois, I urge the IPCB to approve the IEPA's request to revise Illinois' Multi-Pollutant Standard.

Sincerely,
IBEW Local Union 702
Steve Hughart
Steve Hughart, Business Manager

SH:bh

Cc: Brad Beisner, Local 702 Business Representative

Certified Mail / RRR : 7015 0640 00068034 2721