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Friday, June 15th, 2018

Illinois Pollution Control Board
100 W Randolph St. #11
Chicago, IL 60601

Re: R2018-20, Amendments to 35 Ill. Adm. Code 225.233

Please accept these comments on behalf of the Union of Concerned Scientists. Our organization does not support the Illinois Environmental Protection Agency's (IEPA) proposal to amend the Multi-Pollutant Standard (MPS) that permits Dynegy to increase air pollution at certain coal plants in Illinois, avoid installing modern, life-saving pollution controls at its dirtiest plants and incentivizes the shuttering of Dynegy's least polluting plants.

On several occasions already, Dynegy has been granted delays and changes to the MPS by the Pollution Control Board and our organization asks that the Board deny this latest proposal and maintain the original structure and intent of one of Illinois' most important clean air standards.

We are also concerned with the way this rule was proposed, especially in light of the new financial circumstances of Dynegy following its merger with Vistra Energy. The IEPA's process for developing the rule lacked both transparency and any formal public comment period. Additionally, the merger of Texas-based companies Dynegy and Vistra Energy, an agreement valued at \$20 billion, should put an immediate halt to this proposal given that the basis for the proposed rule was Dynegy's stated economic need for "operational flexibility." Profitable companies who knowingly purchase aging, polluting energy assets in Illinois such as Dynegy and Vistra Energy, should comply with existing Illinois law and responsibly install modern pollution controls or invest in cleaner, more competitive sources of generation.

Our analysis [A Dwindling Role for Coal](#), shows the need for policies that enable planning for and investment in cost effective, reliable, and just transitions to a

clean energy economy. We should not try to prop up a fading and uneconomic industry. Rather, we need to invest in impacted communities. Policy makers should prioritize economic development and job transition assistance, alongside other investments in renewable energy and energy efficiency.

Our organization urges the IPCB to reject this proposed rule change that will put our residents at greater risk of air pollution exposure and slow the state's transition to a clean and healthy energy economy.

Sincerely,

Jessica Collingsworth
Lead Midwest Energy Analysis/Advocate
Union of Concerned Scientists

cc:

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