

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)
)
AMENDMENTS TO) **R18-20**
35 ILL. ADM. CODE 225.233,) **(Rulemaking – Air)**
MULTI-POLLUTANT STANDARDS (MPS))

NOTICE OF FILING

To: ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the attached **Motion for Leave to File Instanter Vistra's Final Post-Hearing Comment**, copies of which are herewith served upon you.

/s/ Ryan Granholm

Ryan Granholm

Dated: March 20, 2019

Ryan Granholm
SCHIFF HARDIN LLP
233 South Wacker Drive
Suite 7100
Chicago, Illinois 60606
312-258-5500

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
)	
AMENDMENTS TO)	R18-20
35 ILL. ADM. CODE 225.233,)	(Rulemaking – Air)
MULTI-POLLUTANT STANDARDS (MPS))	

Motion For Leave to File Instanter

NOW COMES Dynegy Midwest Generation, LLC; Illinois Power Generating Company; Illinois Power Resources Generating, LLC; and Electric Energy, Inc. (collectively, “Vistra”),¹ by their attorneys, Schiff Hardin LLP, pursuant to 35 Ill. Admin. Code § 101.500, and requests that the Hearing Officer grant Vistra leave to file instanter its Final Post-Hearing Comments, attached hereto as Exhibit A. In support of this motion, Vistra states as follows:

1. The Illinois Pollution Control Board’s (“Board”) procedural rules grant the Hearing Officer the “authority to rule on all motions that are not dispositive of the proceeding.” 35 Ill. Admin. Code 101.502(a). Both the Board and the Hearing Officer may grant an extension of time to file a document, even after the original deadline has passed. 35 Ill. Admin. Code 101.522. The Board and the Hearing Officer may grant motions for leave to file rulemaking comments instanter, and have done so in the past, particularly where multiple parties filed comments shortly after the comment period expired. *See, e.g., In the Matter of: Hazardous Waste Listings and Test Methods for the Identification of Tetrachlorodibenxo-P-Dioxins*, R84-34, Opinion and Order of the Board at *2 (Nov. 21, 1984); *In the Matter of: Conforming Amendments for the Great Lakes Initiative*, R97-25, Order of the Board at *1 (Sept. 18, 1997).

¹ Dynegy Midwest Generation, LLC; Illinois Power Generating Company; Illinois Power Resources Generating, LLC; and Electric Energy, Inc. own, hold the permits for, and operate all of the units subject to the MPS.

2. On February 4, 2019, the Hearing Officer established March 15, 2019 as the deadline for public comments in this matter. Hearing Officer Order (Feb. 4, 2019). Since that time, Vistra has engaged in discussions with IEPA with the goal of achieving a compromise proposal that is consistent with the positions supported by the key participants to this rulemaking.

3. On March 15, 2019, IEPA informed the Board that it required additional time to complete its final comments, and requested that the public comment period be extended for two business days, until March 19, 2019. Motion for Extension of Time to File Post-Hearing Comments (Mar. 15, 2019). The Hearing Officer granted that motion on March 18, 2019. Hearing Officer Order (Mar. 18, 2019).

4. IEPA did not file its comments on March 19, 2019. Instead, it filed those comments at approximately 10:15 A.M. on March 20, 2019. Due to the nature of its discussions with IEPA, Vistra was unable to finalize its post-hearing comments until it had an opportunity to review IEPA's final comments. Now that IEPA has filed its final comments, Vistra submits this Motion, and the attached Final Post-Hearing Comments, approximately four hours after IEPA submitted its comments.

5. Vistra has consulted with counsel for the Illinois Attorney General's Office ("AGO"), who has indicated that the AGO does not object to this Motion.

WHEREFORE, for the reasons set forth above, Vistra respectfully request that the Hearing Officer grant this motion and accept its Final Post-Hearing Comments as if timely filed.

Respectfully submitted,

/s/ Josh More

Attorney for Vistra

Dated: March 20, 2019

SCHIFF HARDIN LLP

Josh More

Amy Antonioli

Ryan Granholm

Caitlin Ajax

233 South Wacker Drive, Suite 7100

Chicago, Illinois 60606

(312) 258-5500

Exhibit A

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)
)
AMENDMENTS TO) **R18-20**
35 ILL. ADM. CODE 225.233,) **(Rulemaking – Air)**
MULTI-POLLUTANT STANDARDS (MPS))

Vistra’s Final Post-Hearing Comments

NOW COMES Dynegy Midwest Generation, LLC; Illinois Power Generating Company; Illinois Power Resources Generating, LLC; and Electric Energy, Inc. (collectively, “Vistra”),¹ by their attorneys Schiff Hardin LLP, and respectfully submits to the Illinois Pollution Control Board (“Board”) this comment regarding the Illinois Environmental Protection Agency’s (“IEPA” or the “Agency”) proposed modifications to the Board’s second first notice proposal. Vistra submits these comments to respond to questions posed by the Board and to encourage the Board to adopt for second notice the proposed amendments to the Multi-Pollutant Standards (“MPS”), including the revisions suggested in IEPA’s March 20, 2019 public comment.

I. The Board’s Second First Notice Proposal.

On October 4, 2018, the Board issued an Opinion and Order suggesting certain revisions to IEPA’s proposed MPS amendments, and re-issuing the proposed amendments, as revised, for second first notice (the “Board’s Proposal”). The Board found that it “could have proceeded directly to second notice with these substantive changes to IEPA’s original proposal,” but it sought further comment because of “on-going disagreements among the participants” and the “high degree of public participation.” Opinion and Order at 1 (Oct. 4, 2018).

¹ Dynegy Midwest Generation, LLC; Illinois Power Generating Company; Illinois Power Resources Generating, LLC; and Electric Energy, Inc. own, hold the permits for, and operate all of the units subject to the MPS.

The Board's Opinion and Order, however, resolved several of the key issues that had been debated by the rulemaking participants to that point. *First*, the Board clearly held that IEPA's proposed switch to mass-based caps was appropriate: "[T]he Board finds that IEPA has shown that switching from rate- to mass-based caps at the originally-proposed levels—and, logically, the lower revised and alternative proposed caps—would protect human health and the environment." Order and Opinion at 51. *Second*, the Board held that there are no public health implications associated with the proposed MPS amendments, because federal standards, not the MPS, protect public health, and those federal standards would not be threatened by the proposed amendments. *See id.* at 43-44, 46, 56. *Third*, the Board held that caps at the levels suggested in the Board's Proposal would "foreclose a dramatic increase in annual emissions" and, together with cap reductions for temporary and permanent reductions, "prevent potential sizeable shifts in generation and emissions from controlled to uncontrolled plants." *Id.* at 52-53. *Fourth*, the Board held that the MPS amendments were economically reasonable because the additional operational flexibility provided by the proposed amendments would help ensure the viability of the MPS fleet and could also benefit the Illinois energy market. *Id.* at 65.

Based on these findings, the Board issued a revised proposal for second first notice, including the following key elements: annual emissions limits of 44,920 tons of SO₂ and 22,469 tons of NO_x; ozone season limits of 11,500 tons of NO_x; and reductions in each of the emissions caps in the event of transfer, temporary shutdown, or permanent shutdown of any MPS unit.

II. Vistra Accepts IEPA's Revisions.

During this proceeding the Attorney General's Office ("AGO") and the Environmental Groups² raised two primary concerns: (1) the Agency's proposed annual emissions caps would allow for group-wide emission increases from the MPS Group; and (2) emissions from certain individual facilities would increase if the Board adopted the Agency's proposal. The Board's Proposal addressed these concerns by reducing the annual emissions caps and requiring that the caps be reduced even further when units are temporarily or permanently shut down.

Yet, after the Board's Proposal was issued, the AGO and Environmental Groups continued to express concerns. *See* Pre-Filed Testimony of Andrew Armstrong at 1 (Dec. 10, 2018) (indicating that the AGO's "previous testimony [regarding mass-based limits] stands" and it "anticipate[s] submitting additional post-hearing comments" on that issue); Pre-Filed Testimony of James P. Gignac at 4:5-7 (Dec. 10, 2018) (arguing that the Board's Proposal would allow an increase in group-wide SO₂ emissions compared to 2017 levels). The revisions IEPA proposed in its March 20, 2019 comments ("IEPA's Revisions") further address those concerns, and offer additional support for the Board to adopt the proposed MPS amendments for second notice.

a. IEPA's March 20 Comments.

On January 25, 2019, IEPA informed the Board that it had "identified issues" with the Board's Proposal and it was assessing whether "the requirements could be modified to further benefit the environment." Public Comment No. 3250. At IEPA's request, Vistra participated in discussions with the Agency and several other key rulemaking participants regarding further

² The environmental groups that have participated in this proceeding are the Environmental Defense Fund, the Environmental Law & Policy Center, Natural Resources Defense Council, the Respiratory Health Association, and the Sierra Club (collectively, the "Environmental Groups").

revisions to the Board's Proposal. As a result of those discussions, IEPA filed a comment on March 20, 2019, suggesting the following revisions to the Board's Proposal:

- (1) Reduce the annual mass caps for SO₂ to 34,500 tons per year ("tpy") and for NO_x to 19,000 (while retaining the proposed seasonal NO_x cap of 11,500 tons);
- (2) Adjust the amounts by which the caps are reduced when units are temporarily shut down, permanently shut down, or transferred; and
- (3) Mandate that within 30 days after the MPS amendments become effective, the owners and operators of the MPS units begin a process to cease operation and permanently shut down at least 2,000 megawatts (calculated on a nameplate basis) from the MPS Group.

In order to facilitate an end to this lengthy rulemaking process and secure needed regulatory certainty, Vistra has agreed to accept IEPA's Revisions, as explained below.

b. IEPA's Revisions Address the Participants' Remaining Concerns with the Board's Proposal.

IEPA's Revisions are significantly more stringent than the requirements in the Board's Proposal. By recommending annual emissions caps of 34,500 tons of SO₂ and 19,000 tons of NO_x, with significant cap reductions in the event of transfer, temporary shutdown, or permanent shutdown, IEPA's Revisions further address the concerns raised by both the AGO and the Environmental Groups during this proceeding.

Specifically, the annual emissions limits included in IEPA's Revisions closely track the recommendations made by the AGO in its April 3, 2018 testimony: "If the Board does proceed with this rulemaking . . . the People suggest that the Board significantly revise Illinois EPA's proposed annual mass-based emissions caps downward, at least to 34,094 tons for SO₂ and 18,920 tons for NO_x, and to require that such caps be reduced upon the retirement or mothballing of MPS units." Testimony of A. Armstrong at 3 (Apr. 3, 2018).

Similarly, IEPA's Revisions adopt a position nearly identical to one endorsed by the Environmental Groups as an acceptable outcome in the event the Board finds that mass-based

caps are appropriate, which it has. The Environmental Groups stated: “If the Board were to conclude that mass-based caps are justified for a combined MPS group . . . the Environmental Groups would subscribe to the annual caps calculated by the Attorney General’s Office of 34,094 tons for SO₂ and 18,920 for NO_x.” Environmental Groups’ Post Hearing Comments at 2 (June 1, 2018); *see* Post-Hearing Comments of Environmental Groups at 5 (Mar. 15, 2019).

Further, IEPA’s Revisions go beyond what even the Environmental Groups or the AGO have requested in this rulemaking by mandating the permanent shutdown of at least 2,000 of the 5,476 MW currently operating in the MPS Group. Vistra acknowledges IEPA’s recommendation that Vistra’s retirements include EGUs that are not well controlled for SO₂ and NO_x and will take that into consideration when making the retirement decisions along with other relevant factors, including plant economics, how the retirements will affect the system emissions caps, and other regulatory and market rules and requirements. Additionally, the shutdowns required by IEPA’s Revisions would result in lower coal consumption and emissions from the MPS Group. And, the retirement requirement ensures that the emissions caps will be reduced even more in the future because, as provided in the proposed Section 225.233(g), each unit retired will trigger additional reductions in the annual and seasonal emissions caps.

While IEPA’s Revisions include emissions caps at levels far below what is required to protect human health and the environment—as determined by the applicable federal standards recognized in the Board’s October Opinion and Order—Vistra accepts IEPA’s Revisions as a compromise position. This compromise is consistent with statements made on the record by both the Environmental Groups and the AGO. Therefore, the Board should adopt the proposed amendments, with IEPA’s Revisions, for second notice.

c. The Environmental Groups' Critiques of IEPA's Revisions are Unfounded.

Despite the sizeable emissions reductions required by IEPA's Revisions and the unprecedented 36.5% reduction in the size of the MPS Fleet (in MW), the Environmental Groups critiqued the concepts included in IEPA's Revisions in their March 15, 2019 comments. But their "concerns" regarding IEPA's Revisions rely on arguments that the Board has already rejected regarding the appropriateness of mass-based caps and the role of the MPS in protecting public health. Post-Hearing Comments of Environmental Groups at 3-4 (Mar. 15, 2019). As noted above, the Board has already held that adopting mass based caps is appropriate and that federal regulations, including the National Ambient Air Quality Standards ("NAAQS"), not the MPS, protect human health and the environment. *See infra* p. 2.

The Environmental Groups' latest comment also raises concerns—for the first time in this rulemaking—regarding emissions from a single MPS facility: the E.D. Edwards Power Station ("Edwards"), near Peoria, IL. Post-Hearing Comments of Environmental Groups at 4 (Mar. 15, 2019). The Environmental Groups' witness on alleged health effects associated with the MPS, Brian Urbaszewski, did not mention either Peoria or Edwards in his Feb. 6, 2018 pre-filed testimony, nor did he mention the issue at hearing. When he was pressed at hearing by both IEPA and Vistra, Mr. Urbaszewski could not provide any analysis to suggest either that the existing rule prevents so-called emissions "hot spots" or that the proposed revisions would allow for more "hot spots." *See, e.g.*, Second Hearing Transcript at 74:4-75:3 (Mar. 13, 2018). In fact, Mr. Urbaszewski did not identify *any* "short-term spikes in SO₂" emissions at Edwards, or at any other MPS unit in the past ten years. Second Hearing Transcript at 92:18-22. Nor does the Environmental Group's March 15 comment include any evidence regarding either Edwards' emissions or any alleged health effects. There is simply no evidence in the rulemaking record to

support “concerns” over Edwards’ emissions, and therefore they are not a proper basis for opposing IEPA’s Revisions.

In light of the Board’s October 4, 2018 Order and the lack of evidence regarding any localized health or environmental impacts associated with either the existing MPS or the proposed amendments, the Environmental Groups have not expressed any credible basis for the Board to decline to adopt IEPA’s Revisions.

III. Vistra Encourages the Board to Adopt the Proposed Revisions Without Further Delay.

IEPA first proposed revisions to the MPS on October 2, 2017. Since then, Dynegy and Vistra have urged the Board to proceed as quickly as possible so that the company may realize the compliance and operational flexibility associated with the proposal. *See* Response in Support of the Motion for Expedited Review (Oct. 16, 2017); Dynegy’s Response to Environmental Organizations’ Motion to Stay (Feb. 16, 2018); Vistra’s Motion for Expedited Consideration (Oct. 12, 2018). After six days of hearing, nearly a year after IEPA first proposed revisions to the MPS, the Board found on October 4, 2018 that it is appropriate to modify the MPS to adopt a single compliance group and mass-based emissions caps. Opinion and Order of the Board at 1 (Oct. 4, 2018). Now, five months later, in an effort to achieve consensus and regulatory certainty, Vistra has agreed to accept IEPA’s Revisions as a compromise that adopts emissions limits at levels that have been previously endorsed by the Environmental Groups and the AGO.

Both the AGO and the Environmental Groups had an opportunity to comment on the substance of IEPA’s Revisions. They were made aware of the potential compromise as early as the week of February 25, 2019. During that week, counsel for Vistra responded to a number of questions raised by Faith Bugel, counsel for Sierra Club, and Andrew Armstrong, counsel for the AGO, about the Agency’s proposal. The Agency, Vistra, and representatives of Sierra Club, the

Respiratory Health Association, and the Central Illinois Community Health Alliance then met on March 8, 2019 to discuss the proposal before the Agency filed the proposal on March 20, 2019.

While IEPA's Revisions will impact how the MPS fleet is operated as a whole, they are technologically feasible and economically reasonable, as they would enable Vistra to realize some of the compliance and operational flexibility that it has informed the Board is its objective in this rulemaking. In contrast, any further delay would serve only to harm Vistra by creating additional regulatory uncertainty that could impact Vistra's operations and workforce in Illinois, threatening the viability of the entire MPS fleet. Because there is no reason to delay the rule, the Board should adopt IEPA's Revisions and submit the rule for second notice as soon as possible.

IV. Vistra Supports IEPA's Responses to the Board's Questions.

On October 4, 2018, at the same time the Board issued its proposal for second first notice, it also posed a number of questions to the rulemaking participants. Hearing Officer Order at Attachment A, Question A.1 (Oct. 4, 2018). On December 10, 2018, IEPA provided answers to the Board's questions. *See* IEPA's Responses to Board Questions Set Forth in Hearing Officer Order Dated October 4, 2018 (Dec. 10, 2018) ("IEPA's Responses"). Vistra agrees with the responses provided by IEPA, as explained further below.

A. January 1, 2019 is an Appropriate Date for the Amended MPS to Take Effect.

First, the Board directed rulemaking participants to consider whether January 1, 2019 is an appropriate start date for the annual compliance period for the revised MPS rule. Hearing Officer Order at Attachment A, Question A.1 (Oct. 4, 2018). As of this filing, all rulemaking participants that have taken positions on the issue agree that it should.

The Illinois EPA has stated that: "The Board should maintain the January 1, 2019, compliance date, as there is no compelling reason to delay. . . . Vistra will have adequate time to

ensure compliance.” IEPA’s Responses at Response A.1. Similarly, the AGO testified that it “do[es] not object to the rule taking effect . . . during calendar year 2019.” Pre-Filed Testimony of Andrew Armstrong at 2 (Dec. 10, 2018).

Like IEPA, Vistra sees no “compelling reason to delay” the effectiveness of the rule. Vistra supports the Board’s proposed January 1, 2019 compliance date and agrees that it will have adequate time to ensure compliance with the revised rule. January 1, 2019 is not technically an “effective date.” Rather, because the MPS is structured as an annual standard, it merely is the date from which the annual compliance period is measured. The annual compliance period—under both the current rule and the proposed revisions—runs until December 31 and compliance is not reported to the Agency until March 1 the following year. 35 Ill. Admin. Code 225.233(k). For that reason, so long as the revisions are finalized before the end of the year, it is appropriate to set January 1, 2019 as the start date for the first annual compliance period. Because it is an annual standard, the amended MPS will not impose any retroactive obligations on MPS units.

Further, the policy concerns normally associated with retroactive applicability are not present here. Courts warn against rules of retroactive applicability “because of the fundamental principle of jurisprudence that the retroactive application of new laws is usually unfair and the general consensus that notice or warning of the rule should be given.” *Harraz v. Snyder*, 283 Ill. App. 3d 254, 259, 669 N.E.2d 911, 914 (1996).

But here, Vistra is on notice of the proposed revisions to the MPS. It has participated extensively in this rulemaking. Vistra accepts the proposed revisions and is prepared to comply with the proposed emissions caps during both the 2019 ozone season and calendar year. Further, the structure of the revised rule grants MPS units more operational flexibility; Vistra can ensure

compliance after the rule becomes effective by simply reducing or ceasing operations.

Therefore, the policy concerns sometimes associated with retroactive applicability do not apply.

The Board has authorized similar restrictions in the past where they were supported by the affected companies. Notably, the Board has approved conditions in MPS variance cases that included annual emissions limits that were applicable during the same calendar year in which the variance was granted. For example, in PCB 14-10, the Board's November 31, 2013 Order required the IPH Group to achieve an "annual emissions rate of 0.35 lb./mmBtu" in 2013. Opinion and Order of the Board at 103 (Nov. 21, 2013); Petition for Variance at 22 (July 22, 2013) ("From January 1, 2013 . . . IPH will comply with an overall SO₂ annual emission rate of 0.35 lb./mmBtu."). Similarly, in PCB 13-24, the Board set an annual mass emissions cap for the same year in which the variance was granted. Opinion and Order of the Board at 82 (Apr. 4, 2013) ("From January 1, 2013 through December 31, 2013, Midwest Generation must limit system-wide emissions of SO₂ to no more than 57,000 tons."). Like the companies impacted by those variances, Vistra has adequate notice of the changes being considered by the Board and therefore views January 1, 2019 as the appropriate start for the annual compliance period.

Delaying the start date of the compliance period to January 1, 2020 would only serve to further delay the benefits associated with the revised rule, when both IEPA (the regulator) and Vistra (on behalf of the regulated entities), agree that there is no "compelling reason" to do so.

B. Vistra Supports IEPA's Responses and Testimony Regarding Adjustment of Proposed Caps.

The Board's next set of questions concerned the adjustment of emissions caps in the event of temporary shutdown, permanent shutdown, or transfer of MPS units. Vistra supports the responses provided by IEPA on these issues, both in its December 10, 2018 Responses to

Board Questions, as well as in its Additional Suggested Amendment to Section 225.233, filed December 20, 2018.

In particular, Vistra agrees with IEPA that a “temporary shutdown” occurs under the Board’s Proposal when a unit “does not operate during an entire compliance period” and supports IEPA’s proposed amendments to the rule text to include that definition. (Question 3.c). Vistra also supports IEPA’s proposed revisions to clarify that notification of a temporary shutdown may only be made, under IEPA’s definition, when the compliance period ends. Such an approach to temporary shutdowns is the simplest from both an enforcement and a compliance perspective. Vistra does not support the AGO’s suggestion, endorsed by the Environmental Groups, that emissions limits be adjusted where a unit does not operate for less than an entire compliance period. Pre-Filed Testimony of Andrew Armstrong at 8-10 (Dec. 10, 2018); Post-Hearing Comments of Environmental Groups at 5-8 (Mar. 15, 2019).

The AGO’s proposal would be considerably more complicated than IEPA’s proposed definition, without any clear environmental benefit. In the event that a unit does not operate for some period less than an entire compliance period, under IEPA’s Revisions, the emissions from the MPS Group would still be considerably below the levels the Board has determined are protective of the environment and the potential to shift generation to other MPS units would still be limited by federal rules. Additionally, the AGO’s proposed definition and suggested pro-rating of emissions caps does not account for the fact that generation and emissions are not consistent throughout the year. Fourth Hearing Transcript at 17:6 – 19:24.

V. Conclusion.

For the forgoing reasons, Vistra accepts the Board's Proposal, as modified by IEPA's Revisions, and encourages the Board to proceed to second notice.

Respectfully submitted,

/s/ Joshua R. More

Attorney for Vistra

Dated: March 20, 2019

SCHIFF HARDIN LLP
Joshua R. More
Amy C. Antonioli
Ryan C. Granholm
Caitlin M. Ajax
233 South Wacker Drive, Suite 7100
Chicago, Illinois 60606
(312) 258-5500

CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 20th day of March, 2010, I have electronically served the attached **Motion for Leave to File Instantly its Final Post-Hearing Comments**, upon all parties on the attached service list.

My e-mail address is rgranholm@schiffhardin.com;

The number of pages in the e-mail transmission is 19.

The e-mail transmission took place before 5:00 p.m.

/s/ Ryan Granholm

Ryan Granholm

Joshua More
Amy Antonioli
Ryan Granholm
Caitlin Ajax
SCHIFF HARDIN LLP
233 South Wacker Drive
Suite 7100
Chicago, Illinois 60606
312-258-5500

SERVICE LIST

<p>Don Brown, Assistant Clerk Don.brown@illinois.gov Mark Powell, Hearing Officer Mark.Powell@illinois.gov Marie Tipsord, Hearing Officer Marie.Tipsord@illinois.gov Illinois Pollution Control Board James R. Thompson Center Suite 11-500 100 West Randolph Chicago, Illinois 60601</p>	<p>Antonette Palumbo Antonette.palumbo@illinois.gov Dana Vetterhoffer Dana.vetterhoffer@illinois.gov Gina Roccaforte Gina.roccaforte@illinois.gov Division of Legal Counsel Illinois Environmental Protection Agency 1021 North Grand Avenue, East P.O. Box 19276 Springfield, Illinois 62794-9276</p>
<p>Renee Snow Renee.Snow@illinois.gov Office of General Counsel Illinois Department of Natural Resources One Natural Resources Way Springfield IL 62702-1271</p>	<p>Katy Khayat Katy.Khayyat@illinois.gov Department of Commerce and Economic Opportunity Small Business Office 500 East Monroe Street Springfield, IL 62701</p>
<p>Stephen Sylvester ssylvester@atg.state.il.us 69 West Washington Street, Suite 1800 Chicago, IL 60602</p> <p>Andrew Armstrong aarmstrong@atg.state.il.us 500 South Second Street Springfield, IL 62706</p>	<p>Greg Wannier, Staff Attorney Greg.wannier@sierraclub.org Sierra Club Environmental Law Program 2101 Webster Street, Suite 3100 Oakland, CA 94612</p>
<p>Jean-Luc Kreitner jkreitner@elpc.org Justin Vickers jvickers@elpc.org 35 East Wacker Drive, Suite 1600 Chicago, IL 60601</p>	<p>Katherine D. Hodge HeplerBroom LLC khodge@heplerbroom.com 4340 Acer Grove Drive Springfield, IL 62711</p>
<p>Faith Bugel fbugel@gmail.com 1004 Mohawk Wilmette, IL 60091</p>	