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January 22, 2013

Mr. John Therriault, Assistant Clerk
Illinois Pollution Control Board
100 W. Randolph St., Suite 11-500
Chicago, IL 60601-3218

**RECEIVED
CLERK'S OFFICE**

JAN 24 2013

**STATE OF ILLINOIS
Pollution Control Board**

PCB 13-24

Re: Support for Midwest Generation's Requested Variance, Docket No. PCB 13-24

Dear Mr. Therriault:

The Illinois AFL-CIO represents nearly 900,000 union members and is the voice of all working families in the state. Our power lies with the many and diverse people we represent in a multitude of workplaces and in our ability to affect change. Included in our membership are many men and women who work either directly for Midwest Generation or the contract employees who do significant work at the Midwest Generation plants across the State of Illinois. It is with this in mind that I would like to be on record with the Illinois Pollution Control Board as strongly supporting Midwest Generation in its request for short-term relief from state regulations governing emissions at its coal-fired power plants.

Midwest Generation is a company that conducts itself with a great deal of integrity and responsibility to stakeholders -- whether employees, policymakers or communities surrounding its plants. Its request for a variance is straightforward and reasonable.

All it seeks is permission to invest less than it otherwise would have during just two years of the State's 12-year emissions reductions program. The company is not looking to duck its responsibilities; it merely wants to defer some capital expenses for environmental improvements as it goes through a financial restructuring.

Even if granted the variance, Midwest Generation would still hit the state-mandated emissions targets by the end of the program in 2019. And, its emissions from 2013-16 would be less than projected when current state regulations were adopted in 2007. In other words, the request would result in lower emissions than currently required.

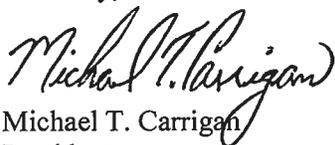
Midwest Generation contributes a great deal to the Illinois economy. It provides 850 good jobs for its employees (65 percent union) and hundreds more for building and construction trade union members hired for special projects in the plants. It purchases hundreds of millions of dollars of goods and services from Illinois companies. It pays nearly \$5 million in property taxes to support local schools and municipal services. It has always shown a strong commitment to corporate citizenship through involvement in community, civic and charitable organizations.

Finally, there is an issue of fundamental fairness. Just last September, the Pollution Control Board granted Ameren a variance that was similar in many respects to what Midwest Generation seeks. In fact, the major difference is that Midwest Generation's request is more limited in scope than Ameren's.

I respectfully request that the Board approve Midwest Generation's request.

Thank you for considering and registering my comment.

Sincerely,



Michael T. Carrigan
President

Cc: Charles Parnell, Edison Mission Energy/Midwest Generation

MTC/pmw
liuna#362 aflcio