

United Brotherhood of Carpenters and Joiners of America

Local Union No. 174

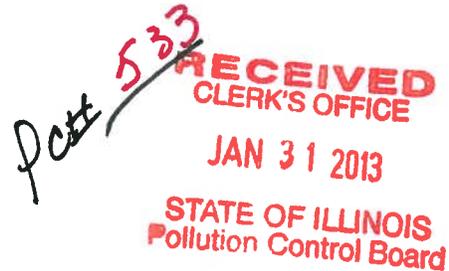


1407 ESSINGTON ROAD
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January 18, 2013

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



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

Dear Mr. Therriault:

As Business Representative of the Will County Carpenters Local #174, representing 1,500 union carpenters in the region, I'm writing in support of Midwest Generation's request to delay investment in additional pollution controls.

Midwest Generation is a major provider of jobs at its plants and through supplies and services it buys from Illinois companies. Nearly 65 percent of its 850 employees are union members. Hundreds of additional union carpenters work on special projects in the plants, often installing new pollution controls.

I understand the need to protect environmental health and safety. And there should be no doubt about Midwest Generation's record in this area: it has been committed since its establishment in 1999 to investing in environmental improvements – sometimes even before new government rules were in place. It operates its plants with the highest priority on safety for all workers at all times.

While granting the requested variance will help the company deal with its current financial issues, it also will result in lower emissions than currently required.

All Midwest Generation wants is permission to invest less in pollution controls than it otherwise would have in just two years of the 12-year state emissions reduction program. The company is trying to get in the best possible position to manage through its financial restructuring and protect jobs and revenues. 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.

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Other coal-fired power generators also are going through a tough time financially due to depressed energy prices at the same time they have to invest in new pollution controls. One of them is Ameren, which last September won approval from the Illinois Pollution Control Board of its request for a similar variance.

I respectfully request that the Illinois Pollution Control Board grant Midwest Generation the time it needs to complete its corporate restructuring. Thank you for considering and registering my comment.

Sincerely,

John Scheidt
Business Agent
Will County Carpenters
Local #174