



STATE OF ILLINOIS
SENATE

SENATOR
MIKE JACOBS
36TH DISTRICT

RECEIVED
CLERK'S OFFICE
FEB 08 2013
STATE OF ILLINOIS
Pollution Control Board

STATE CAPITOL
SPRINGFIELD, ILLINOIS
62706

January 25, 2013

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

PC#4784

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

Dear Mr. Therriault:

As Chairman of the Illinois State Senate Energy Committee, I am writing to voice my strong support of Midwest Generation's request to temporarily delay investment in additional pollution controls. Granting the request will undoubtedly help the company manage through its current financial constraints while still resulting in lower emissions than are currently required.

I deeply understand and work for the need to protect Illinois' environmental health and safety. But there should be no doubt about Midwest Generation's record in this area: since the company was established in 1999, they have been committed to investing in environmental improvements – sometimes even before new government rules were in place.

All Midwest Generation needs is permission to invest less in pollution controls than it otherwise would have during 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.

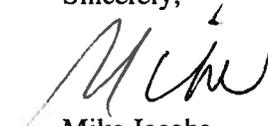
Even if granted the variance, Midwest Generation would still hit the state-mandated emissions targets by the end of the program in 2019. And, its emissions from 2013-16 would be less than projected when current state regulations were adopted.

As we well know, 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.

Midwest Generation is a major provider of jobs in Illinois -- 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 members in the building and construction trades work on special projects in the plants, often installing new pollution controls.

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,

A handwritten signature in black ink, appearing to read "Mike Jacobs", with a small mark above the "i".

Mike Jacobs
State Senator
36th District



STATE OF ILLINOIS
SENATE

SENATOR
MIKE JACOBS
36TH DISTRICT

STATE CAPITOL
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January 25, 2013

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

PC#4785

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

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I deeply understand and work for the need to protect Illinois' environmental health and safety. But there should be no doubt about Midwest Generation's record in this area: since the company was established in 1999, they have been committed to investing in environmental improvements - sometimes even before new government rules were in place.

All Midwest Generation needs is permission to invest less in pollution controls than it otherwise would have during 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.

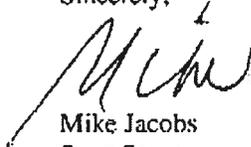
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Midwest Generation is a major provider of jobs in Illinois -- at its plants and through supplies and services it buys from Illinois companies. Nearly 65 percent of its 850 employees are union members. Hundreds of additional union members in the building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

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,

A handwritten signature in black ink, appearing to read "Mike Jacobs", with a stylized flourish at the end.

Mike Jacobs
State Senator
36th District

302 N. Chicago Street
Joliet, Illinois 60432



(815) 774-7480
Fax (815) 740-4600

Lawrence M. Walsh
Will County Executive

January 22, 2013

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

PCB 4786

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

Dear Mr. Therriault:

I am writing to register my support for Midwest Generation's request for temporary relief from certain State of Illinois air pollution control requirements. It is a reasonable request for a small amount of regulatory flexibility that can greatly benefit local economies and jobs.

I have served as Will County Executive for eight years and represented a large portion of Will County in the Illinois State Senate for another eight years before that, so I know well that Midwest Generation operates its Illinois plants safely and with integrity and is committed to supporting local communities surrounding its plants. It always does an excellent job of explaining its environmental responsibilities and compliance with state and federal regulations.

Obviously health and safety considerations come first. But Midwest Generation has demonstrated time and again it understands its role as an engaged corporate citizen of our community. And like every community in Illinois, we need business to provide jobs and contribute dollars to our economies and government budgets.

Like others in its industry, Midwest Generation is going through a tough time financially due to depressed energy prices at the same time it's required to make additional capital investments to meet new air quality regulations.

The temporary relief requested by Midwest Generation is intended to help the company manage through a period of financial hardship and hopefully avoid plants closings and layoffs. The Will County and Joliet generating stations provide 400 jobs for local residents and much-needed tax dollars for government services and schools. It invests time, energy and dollars in our community.

I urge the Illinois Pollution Control Board to approve Midwest Generation's request.

Thank you for considering and registering my comment.

Sincerely,

Lawrence M. Walsh

Lawrence M. Walsh
Will County Executive

Cc: Charles Parnell



City of
Waukegan

100 N. Martin Luther King Jr. Avenue
Waukegan, Illinois 60085
www.waukeganweb.com
☎ (847) 599-2500

Robert G. Sabonjian, Mayor
Wayne Motley, City Clerk
Dr. John R. Schwab, Treasurer

January 31, 2013

PC# 4787

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 the Mayor of the City of Waukegan, I would like to be on record with the Illinois Pollution Control Board as supporting Midwest Generation in its request for short-term relief from state regulations governing emissions at its coal-fired power plants.

The Waukegan Station is a vital part of the economic engine of Waukegan and Lake County and I would hope that we will do whatever possible to ensure the long-term viability of the plant. 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 and hundreds more for building and construction workers hired for special projects in the plants. It purchases hundreds of millions of dollars of goods services from Illinois companies. It pays nearly \$5 million in property taxes to support local schools and municipal

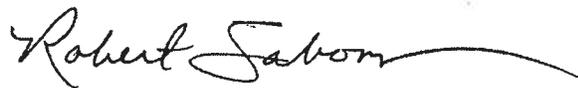
services. It has always shown a strong commitment to corporate citizenship through involvement in community, civic and charitable organizations.

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 approved Midwest Generation's request.

Thank you for considering and registering my comments.

Sincerely,

A handwritten signature in black ink that reads "Robert Sabonjian". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

Robert G. Sabonjian
Mayor



LOCAL 15

INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS

Suite 1
6330 Belmont Road
Downers Grove, IL 60516
(630) 515-0381
Fax (630) 515-0835

DEAN F. APPLE
President / Business Manager / Financial Secretary

TERRY L. MCGOLDRICK
Vice-President

CHRISTINE A. WATKINS
Recording Secretary

THOMAS S. CHRIST
Treasurer

To: Illinois Pollution Control Board

PC 4788

HAND DELIVERED

This letter is about the people, all the people. Our first concern is the 550 plus Local 15 members that work at these stations; include their spouses and families and that number can quickly triple in size. Add on the 300 management people that also work at these plants, and their spouses and families and suddenly we are concerned about a couple of thousand people. Now add in the hundreds of tradesmen and women that work in these stations; and don't forget their families. But that's not all. We care about the rest of the people in Illinois and the surrounding states. Not just the environment but the economy also.

MWGen is asking for a little bit of time. The economy has hit this industry extremely hard and forcing them to hold to a timeframe agreed to years ago may be enough to cause all or many of these stations to close. That doesn't help anyone except possibly their competitors. And we all know that when competition is down, prices go up, costing everyone more money. MWG is not asking for an advantage but for a level playing field.

MWG is asking for two things. First, a small variance to the emission rate limit for sulfur dioxide for a two year period (2015 and 2016) so that they can delay spending over \$200 million in capital expenses in 2013 and 2014. This makes a lot of sense since they filed for Chapter 11 bankruptcy protection in December of 2012. Even if granted this variance, the Company guarantees the **actual tons of emissions will decline** in 2015 and 2016, returning to the original CPS emission rate limit in 2017, 2018 and 2019.

Second, MWG is asking for a five-month extension of the CPS' requirement to install additional pollution control equipment on one unit at Waukegan Station. The company has agreed not to operate the unit after Dec. 31, 2014 until the work is completed, and will retire the unit if the equipment is not installed by May 31, 2015.

Even if granted this variance, MWG will spend around \$230 million on pollution controls in 2013 and 2014. From 2013-2016 actual sulfur dioxide emissions will be over 3000 tons less than originally projected. We have seen this company spend hundreds of millions of dollars on pollution control equipment. MWG has met some regulations, mercury for example, over five years ahead of time. The company has achieved the sulfur dioxide 2013 emission rate limit in 2011 and year-to-date in 2012 and is not seeking changes to the CPS for 2013 and 2014.

We are concerned about the environment and would not support this variance if we believed it would have a negative impact. Our members live in these areas and work in these stations. Most of them have children and grandchildren that live in these areas also.

We are asking you to support this variance and give MWG a little bit of time to get through an extremely tough financial period, not by giving them a break, but by realizing the electrical generating industry has seen some major changes since MWG's agreement with the Illinois Environmental Protection Agency in 2007. In the long run this will help the environment and the economy.

Sincerely,

Dean F. Apple

Dean F. Apple
President / Business Manager / Financial Secretary
IBEW Local 15



BRIESER CONSTRUCTION COMPANY

www.brieserconstruction.com

General Contractor

24101 S. Municipal Drive
Channahon, Illinois 60410
Phone: (815) 521-0900
Fax (815) 521-0999



PO#4289

TO: Illinois Pollution Control Board

Gentlemen,

On behalf of the 180 area union craftsman employed by Brieser Construction Company, we ask that you grant the variance requested by Midwest Generation to extend temporary relief of spending on environmental improvements.

Midwest Generation is a valued customer and very important employer here in Will County providing hundreds of good paying union construction trades jobs and millions of tax dollars to surrounding communities.

It is our belief that given this opportunity, Midwest Generation will continue to be a responsible utility providing for the electrical energy needs of this area and continue to provide the critical job opportunities so vitally needed here in the State of Illinois.

Thank you for your consideration,

Frank Studer, Business Development Manager
Brieser Construction Company.

**IN SUPPORT OF MIDWEST GENERATION'S
REQUESTED VARIANCE**

**ILLINOIS POLLUTION CONTROL BOARD
DOCKET NUMBER PCB 13-24**

PC# 4790

January 2013

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

Re: Support for Requested Variance, Docket No. PCB 13-24

Dear Mr. Therriault:

I respectfully request that the Illinois Pollution Control Board approve Midwest Generation's request for temporary relief from comprehensive state regulations that have ensured ongoing reductions in air emissions from the company's plants from 2008 to 2019.

Midwest Generation is merely asking permission to reduce, not eliminate, spending on environmental improvements during two years in the middle of a 12-year emissions reduction program. The company has been meeting all of its environmental commitments under state regulations, and even with the variance, would meet all requirements by the time the state program ends in 2019.

I also would ask that the IPCB consider that it granted Ameren relief just a few months ago that went beyond what Midwest Generation is requesting.

Midwest Generation employs 845 men and women, 64 percent of them union members. It provides jobs for hundreds of additional workers, most of them members of the building and construction trades. It spends close to \$400 million on goods and services from Illinois companies and to support various Illinois organizations, and nearly \$5 million on local property taxes. And it provides energy to homes and businesses throughout our state. It is deserving of your support for the requested variance.

Thank you for considering my letter

NAME

ADDRESS

Steve Jullien
GENESE THEATRE
203 N. Genese St.
Waukegan, IL 60085