

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

EXELON GENERATION LLC,)	
)	
Petitioner,)	
)	
v.)	PCB 16-106
)	(Variance- Air)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

TO: John Therriault
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PLEASE TAKE NOTICE that we have today electronically filed **Petitioner Exelon Generation LLC's Response to the Illinois Pollution Control Board's July 21, 2016 Question** with the Office of the Clerk of the Illinois Pollution Control Board.

Dated: July 28, 2016

Respectfully submitted,
EXELON GENERATION LLC

By: /s/ Katharine F. Newman

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PETITIONER EXELON GENERATION LLC'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD'S JULY 21, 2016 QUESTION

Exelon Generation LLC ("Exelon Generation" or "Company"), by and through its attorneys, Sidley Austin LLP, respectfully offers the following response to the question posed by the Illinois Pollution Control Board ("Board") on July 21, 2016 in an attachment to the Hearing Officer Order ("Order"). The Order directs Exelon Generation to respond on or before July 29, 2016. Below, Exelon Generation sets forth the Board's question in italics and provides an answer immediately following the question.

Question

The Board directs Exelon to propose a condition to the variance, for example purchasing and retiring SO₂ credits, that would minimize or offset the impact of the potential discharge of 1.284 SO₂ emissions as estimated under Exelon's proposed compliance plan. If Exelon cannot propose such a condition, the Board directs Exelon to provide an explanation of how it will minimize "the impact of the discharge of contaminants" without such a condition.

Exelon Generation Response:

Exelon Generation agrees to a condition to the requested variance requiring the Company to purchase and retire fifty (50) tons of Illinois-based SO₂ Group 1 allowances under the Cross-State Air Pollution Rule program, which represents ten (10) tons of SO₂ allowances for each of the five years of the requested variance.

As explained previously, the overall environmental impact of the requested variance is minimal. Exelon Generation estimates that actual emissions resulting from the requested variance will be less than 0.481 tons from all four facilities combined, and that this figure will be distributed over the course of the requested variance. *See* Exelon Generation's July 14, 2016 Responses to the Board's Questions ("Exelon Generation Responses") at 3-4. The total emissions calculation using the 250 ppm proposed compliance plan concentration (1.284 tons) is merely theoretical because the sulfur concentrations at the Stations are already below 250 ppm. Exelon Generation Responses at 8. None of the Stations are located in an SO₂ nonattainment area, and Illinois EPA "does not believe that any injury to the public or environment will result from granting the variance." Illinois EPA Recommendation at ¶ 28.

More specifically, Exelon Generation proposes the following condition for its requested variance:

Exelon Generation shall purchase and retire fifty (50) tons of Illinois-based SO₂ Group 1 allowances under the Cross-State Air Pollution Rule program.

Respectfully submitted,

EXELON GENERATION LLC

By: /s/ Byron F. Taylor

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on July 28, 2016, I electronically served the attached **Petitioner Exelon Generation LLC's Response to the Illinois Pollution Control Board's July 21, 2016 Question** on the following persons:

John Therriault
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Dated: July 28, 2016

/s/ Katharine F. Newman

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