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AUG 02 2012

STATE OF ILLINOIS
Pollution Control Board

July 30, 2012

Members of the Illinois Pollution Control Board
C/o John Therriault, Associate Clerk
Illinois Pollution Control Board
100 W. Randolph Street, Ste. 11-500
Chicago, IL 60601-3218

PC#3

RE: Dynegy Midwest Generation Petition for Variance from the Illinois Multi-Pollutant Standard: PCB 2012-135

Dear Honorable Members of the Illinois Pollution Control Board,

On behalf of the Illinois AFL-CIO, I wish to express our support for approval of this request for variance. Dynegy Midwest Generation (DMG) is a key employer of unionized workers and the economic benefits DMG provides the State of Illinois and local communities is critical during these economically trying times.

As we understand the request, DMG seeks to continue the trading of So2 emission allowances in part due to the economic crisis felt by the industry across the country, but also in part due to circumstances unique to Illinois power generators.

We believe it is important to note that DMG is not seeking relief from any other components of the Multi Pollutant Standard. The recent unforeseen and dramatic drop in natural gas prices coupled with historic low power market prices have exacerbated conditions for Illinois power generators operating in a deregulated power market and subject to stricter emissions standards than competitors in neighboring states. Illinois companies like DMG are now disproportionately bearing costs attributable to these unexpected events.

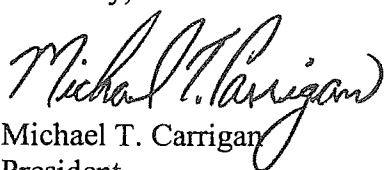
DMG has complied with initiatives to lower power plant emissions. As a matter of fact their plants have finished the construction work to meet these emission requirements prior to the required timeframes. All toll they have spent nearly \$1 billion on these projects.

DMG has been a major source of economic influence throughout the State of Illinois. Their plants provide hundreds of well-paying jobs for both full time employees and the building trades. Their various environmental projects have provided an economic "boom" for Illinois

construction trades all across Illinois. The property tax revenues generated by their plants greatly contributes to various tax jurisdictions in Illinois.

The Illinois AFL-CIO requests the IPCB to grant DMG's variance request. As evidenced by the Illinois Environmental Protection Agency's position we believe granting the variance will not create an increase in So2 emissions that could harm Illinoisans. Granting the variance to a Company who has met environmental requirements and provided economic benefits to the State of Illinois should be an easy decision to reach.

Sincerely,


Michael T. Carrigan
President

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