

**Comments to the
ILLINOIS POLLUTION CONTROL BOARD**

**Submitted by Mary Schoen
Manager, Environmental Strategies, Environmental Affairs
Enron Corp**

P.C.#7

IN THE MATTER OF:

PROPOSED NEW 35 ILL. ADM. CODE 217,	}	
SUBPART W, THE NO_x TRADING PROGRAM	}	
FOR ELECTRICAL GENERATING UNITS,	}	R01-9
AND AMENDMENTS TO 35 ILL. ADM. CODE	}	(Rulemaking - Air)
211 AND 217.	}	

Enron Corp was pleased to present testimony before the Pollution Control Board on September 26, 2000. We would like to commend both you and the Illinois Environmental Protection Agency for your open dialogue with industry and other affected parties throughout this rule making.

During the industry hearing, the question was raised by a Board Member about what other states have done during their SIP development on energy efficiency and renewable energy set asides. The United States Environmental Protection Agency and Department of Energy recommended energy efficiency and renewable energy set asides as a way to create low cost emission reductions while promoting other energy priorities. The US EPA has provided states with two volumes of guidance on the implementation of such a program (*Establishing a Set Aside Program and Administering a Set Aside Program*) with the third (*Designing Measurement and Verification Requirements*) due out any day. These documents may be accessed at the following web site: http://www.epa.gov/appdstar/state_local_govnt/state_outreach. Of the states that have submitted SIPs, New Jersey, New York, Massachusetts and Maryland have included energy efficiency/renewable energy sets asides as part of their SIPs. These set asides have ranged from 3 to 5 percent of the total pool of allowances.

Enron Corp. is very supportive of developing these set asides as a way to achieve least cost emissions reductions in a state, and to fully realize the value of energy efficiency and renewable energy projects. Enron Corp appreciates the opportunity to provide additional input on this important topic, and we would be pleased to answer any questions the Pollution Control Board may have regarding our comments.