

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD


)	
DYNERGY MIDWEST)	
GENERATION, LLC.)	
)	PCB 12-135
Petitioner,)	(Variance - Air)
)	
v.)	
)	
)	
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent)	

NOTICE OF ELECTRONIC FILING

To: Attached Service List

PLEASE TAKE NOTICE that on July 12, 2012, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois a **PUBLIC COMMENT** on behalf of the Environmental Law & Policy Center, Natural Resources Defense Council, Sierra Club, and the Respiratory Health Association, a copy of which is attached hereto and herewith served upon you.

Respectfully submitted,



Andrew Armstrong
Environmental Law and Policy Center
35 East Wacker Drive, Suite 1600
Chicago, Illinois 60601

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Petitioner,)	PCB 12-135
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PUBLIC COMMENT

I. Introduction

Pursuant to 35 Ill. Adm. Code 104.224(b), the Environmental Law & Policy Center, Natural Resources Defense Council, Sierra Club, and the Respiratory Health Association (collectively, “Citizens Groups”) hereby file this public comment on the Petition for Variance (“the Petition”) filed by Dynegy Midwest Generation, LLC (“Dynegy”) with the Pollution Control Board (“Board”) on June 8, 2012.¹ As discussed below, the Board should deny the Petition because Dynegy’s proposed variance would allow for increased harmful air pollution.

II. Background

Dynegy requests a variance from provisions of Illinois’ Multi-Pollutant Standard (“MPS”)² which (i) prohibit electric generating unit (“EGU”) owners or operators from trading or selling sulfur dioxide (“SO₂”) allowances “that would otherwise be available for sale or trade” due to compliance with the SO₂ requirements of the MPS, and (ii) require EGU owners or operators to surrender any excess SO₂ emissions to the Illinois Environmental Protection Agency (“IEPA”). As Dynegy explains, the MPS requires Dynegy’s “MPS Group,” for which it seeks the variance, to meet fleet-wide SO₂

¹ Citizens Groups do not request a hearing pursuant to 35 Ill. Adm. Code 104.224(c).

² The MPS is codified at 35 Ill. Adm. Code 225.233.

limits of .24 lb/mmBtu in 2013 and .19 lb/mmBtu in 2015. Petition at 10-11, n. 13. Because Dynegy has installed SO₂ pollution controls at several of its EGUs in order to comply with the MPS and a 2005 Consent Decree covering several of the MPS Group EGUs, Dynegy expects to meet the MPS' SO₂ limits by the end of 2012. Petition at 4-5, 8-9.

Dynegy's MPS Group EGUs, all of which are coal-fired power plants, are also subject to federal law limiting SO₂ emissions. U.S. EPA has issued two rules regulating cross-state emissions of SO₂ under the "good neighbor" provision of the Clean Air Act ("CAA"), CAA § 110(a)(2)(d)(i)(I): the Clean Air Interstate Rule ("CAIR"),³ and the Cross-State Air Pollution Rule ("CSAPR").⁴ CAIR was remanded without vacatur in 2008 and, due to a stay of the more recent CSAPR, remains in effect unless and until CSAPR, or another rule promulgated to implement the "good neighbor" provision of the CAA, goes into effect. *See* Petition at 5, n.7; 13. Both CAIR and CSAPR provide for trading programs for SO₂ emissions. Under those programs, covered sources are allocated a certain number of emission allowances for a given time period and are required, at the end of that period, to surrender to U.S. EPA the number of allowances equal to their emissions of SO₂ during that period. Petition at 11. A source that was allocated insufficient allowances may buy allowances from another source that has excess allowances.⁵ Due to its compliance with the SO₂ requirements of MPS and the Consent Decree, Dynegy expects to have "excess" allowances under CSAPR,⁶ which it would like to be able to sell as part of the CSAPR trading program. Petition at 12, 18-19.

³ *Rule To Reduce Interstate Transport of Fine Particulate Matter and Ozone (Clean Air Interstate Rule); Revisions to Acid Rain Program; Revisions to the NOX SIP Call*, 70 Fed. Reg. 25,162 (May 12, 2005).

⁴ *Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals*, 76 Fed. Reg. 48,208 (Aug. 8, 2011).

⁵ A source has "excess" allowances if its SO₂ emissions during a given period are less than the number of allowances it was allocated for that pollutant during that period.

⁶ As Dynegy notes, under CSAPR, U.S. EPA determined the emission allocations for covered sources "based on [a] unit's maximum historic emissions," Petition at 13, without taking into account the emissions reductions that would be achievable – and in Dynegy's case, are already achievable – using SO₂ pollution controls.

III. The Board Should Deny the Petition Because the Variance Will Worsen Air Quality.

Dynergy argues that the variance will “not result in an environmental detriment.” Petition at 23. Dynergy stretches the truth. There is no question that this variance would allow significantly greater SO₂ emissions than would be possible without the variance. Indeed, Dynergy acknowledges that this variance would add approximately 46,000 allowances to the market, translating into as many as 46,000 additional tons of SO₂ emissions. Petition at 18-19. These allowances could be sold either in Illinois to sources not covered by the MPS or the similar Combined Pollutant Standard,⁷ or to a CSAPR state upwind of Illinois,⁸ both of which could affect air quality in the state.

Contrary to Dynergy’s claims, this air quality impact is not harmless. Although Citizens Groups do not here challenge U.S. EPA’s conclusion that the emissions allowances under CSAPR eliminate covered states’ “significant contribution” to nonattainment and interference with the maintenance of the National Ambient Air Quality Standards in downwind states, that does not mean that additional SO₂ emissions will have no impact. In fact, research conducted by the National Research Council (“NRC”) for a 2010 report⁹ makes clear that each additional ton of SO₂ emitted by EGUs creates health impacts to the tune of thousands of dollars in damages.¹⁰ Thus, Dynergy’s claim that the 46,000 additional allowances the variance would make available would “not result in an environmental detriment” is simply not accurate.

Further, Dynergy’s claim that certain actions it has taken “mitigate” the air quality impacts of the variance also should be rejected. Specifically, Dynergy claims that “four recent initiatives” it has

⁷ The CPS is codified at 35 Ill. Adm. Code 225.291-99.

⁸ For example, Missouri is subject to the same CSAPR SO₂ trading program as Illinois. 76 Fed. Reg. at 48,441.

⁹ National Research Council, “Hidden Costs of Energy: Unpriced Consequences of Energy Production and Use,” 2010, National Academies Press, available at http://www.nap.edu/catalog.php?record_id=12794 (last visited July 5, 2012).

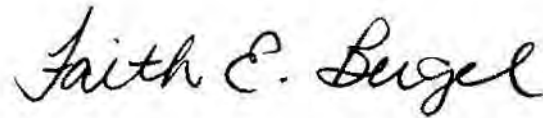
¹⁰ See National Research Council, spreadsheet noting costs per ton of SO₂ and other emissions from 407 power plants in the United States, attached hereto as Ex. A. Using the NRC’s data, the average damages per ton of SO₂ emissions from five Dynergy plants (Baldwin Energy Complex, Havana Power Station, Hennepin Power Station, Wood River Power Station, and the now-retired Vermilion Power Station) total \$6,130 in 2007 dollars (((\$4,970 (Baldwin) + \$5,850 (Havana) + \$6,240 (Hennepin) + \$6,860 (Vermilion) + \$6,730 (Wood River))/5 = \$6,130).

undertaken “will help to mitigate” the impact of the variance. Petition at 24. These “initiatives” include (a) outages at several of Dynegy’s EGUs between 2007 and 2012, during which times those EGUs did not emit SO₂; (b) the operation of spray dry absorbers at Baldwin “before the applicable compliance deadline,” which Dynegy claims “reduced” SO₂ emissions by over 3,162 tons; (3) the retirement of the Vermilion plant in 2011; and (4) the “ongoing” retirement of oil-fired and gas-fired boilers at the Havana and Wood River plants. Petition at 24-25. The inclusion of these sets of “emissions reductions” as somehow mitigating the impact of the Dynegy’s proposed variance is inappropriate. To obtain a variance, the petitioner must establish that “the hardship resulting from a denial of *the variance* outweighs any injury to the public or the environment from a grant of *the variance*.” *Marathon Oil Co. v. Ill. Env’t Prot. Agency*, 242 Ill. App. 3d 200, 206 (5th Dist. 1993) (emphasis added). All of the “initiatives” that Dynegy lists are entirely unrelated to the variance, and, in many cases, *occurred years before Dynegy even sought the variance*. It is unreasonable for Dynegy to claim that reductions in emissions resulting from actions it took years ago “mitigate” the impact of the variance it now proposes. Nor should actions that are entirely unrelated to the variance be considered in evaluating the air quality impacts of the same. If the air quality impact of the variance is properly evaluated, excluding those farfetched “emission reductions,” it is clear that the variance will allow significantly more harmful SO₂ pollution and thereby worsen air quality. For this reason, the Board should deny the variance.

IV. Conclusion.

For the reasons addressed in these comments, the Board should deny Dynegy’s Petition for Variance.

Respectfully submitted,

A handwritten signature in black ink that reads "Faith E. Bugel". The signature is written in a cursive, flowing style.

Faith Bugel
Andrew Armstrong
Jennifer Cassel
Environmental Law and Policy Center
35 East Wacker Drive, Suite 1600
Chicago, Illinois 60601

DATED: July 12, 2012

EXHIBIT A

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July 6, 2012

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The attached material is provided in accordance with the procedures of the National Academy of Sciences implementing the requirements of Section 15 of the Federal Advisory Committee Act, P.L. 105-153 5 U.S.C. App. Section 15 (1997).*

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* * * * * PC# 1 * * * * *

Note: All figures are in 2007 USD and use a VSL of \$6 million (2000 USD)

ORISPL	OPRNAME	FACILITY NAM	FIPS	LAT	2005 Net Generation (KWh)	SO2 Damages	Nox Damages	PM 2.5 Damages	PM 10 Damages	Total Damages	Damages per Ton of SO2	Damages per Ton of NOx	Damages per Ton of PM 2.5	Damages per Ton of PM 10	
3	Alabama Power	080103	31.0069	-88.0103	1.16E+10	1.31E+08	1.40E+07	6.25E+06	1.29E+07	1.51E+08	2.43E+03	7.34E+02	2.54E+03	1.13E+02	
7	Alabama Power	GadSDen	01055	34.0136	4.30E+08	4.35E+07	2.55E+06	1.81E+06	4.50E+07	1.31E+05	4.66E+03	8.84E+02	5.74E+03	2.65E+02	
8	Alabama Power	Gorgas	01127	33.6446	-87.2003	7.90E+09	3.64E+08	1.06E+07	1.89E+07	9.45E+05	3.95E+08	4.34E+03	8.15E+02	6.71E+03	2.82E+02
10	Alabama Power	Greene	01063	32.6017	-87.7811	5.06E+06	5.06E+06	1.58E+06	1.48E+05	1.58E+06	1.73E+08	3.48E+03	6.93E+02	3.48E+03	1.59E+02
26	Alabama Power	C Gaston	01117	33.2442	-86.4567	1.13E+10	5.01E+08	2.07E+07	2.65E+07	1.42E+06	5.50E+08	3.92E+03	8.17E+02	4.23E+03	1.99E+02
47	Tennessee Val	Colbert	01033	34.7439	-87.8486	1.93E+08	1.93E+08	1.52E+07	1.75E+07	9.17E+05	2.26E+08	4.94E+03	9.30E+02	2.29E+02	2.29E+02
50	Tennessee Val	Widow Creek	01071	34.8825	-85.7547	9.82E+09	1.84E+08	1.54E+07	1.84E+07	6.38E+05	2.13E+08	5.56E+03	8.24E+02	5.24E+02	5.24E+02
51	CLECO Power	Dolet Hills	22031	32.0306	-93.5692	4.84E+09	6.05E+07	2.26E+07	2.70E+06	1.54E+05	8.60E+07	2.55E+03	1.73E+03	4.46E+03	2.11E+02
56	Alabama Elect	Charles R Low	01129	31.4833	-87.9125	3.86E+09	5.26E+07	6.50E+06	4.36E+06	2.24E+05	6.37E+07	3.37E+03	6.11E+02	1.69E+02	1.69E+02
87	Tn-State G & T	Escalante	35051	35.4159	-108.0820	1.91E+09	3.55E+06	4.58E+06	5.86E+05	3.75E+04	8.76E+06	2.75E+03	1.21E+03	2.78E+03	1.68E+02
108	SunFlowwer Ele	Hokomb	20055	37.9306	-100.9725	2.68E+09	6.49E+06	5.21E+06	7.74E+05	5.27E+04	1.26E+07	3.66E+03	1.15E+03	2.39E+03	1.47E+02
113	Arizona Public	Cholla	04017	34.9333	-110.3000	7.57E+09	1.64E+07	6.18E+06	4.43E+05	8.69E+07	1.20E+03	1.11E+03	3.00E+03	1.77E+02	1.77E+02
126	Tucson Electric	H Wilson Sund	04019	32.1600	-110.9047	7.79E+08	8.62E+06	2.23E+06	2.31E+04	1.12E+07	2.32E+03	1.28E+03	3.37E+03	1.91E+02	1.91E+02
127	Public Service	Oklauion	48487	34.0833	-99.1769	4.34E+09	1.39E+07	1.39E+07	1.73E+05	2.38E+07	1.22E+08	1.66E+03	1.61E+03	3.99E+03	1.99E+02
130	South Carolina	Cross	45015	33.3692	-80.1119	7.85E+09	4.11E+07	2.35E+06	5.13E+06	2.80E+05	4.89E+07	4.51E+03	7.09E+02	5.27E+03	2.40E+02
136	Seminole Elect	Seminole	12107	29.7333	-81.6339	7.16E+09	9.87E+06	2.92E+06	1.56E+05	9.02E+07	2.75E+03	4.68E+02	3.09E+03	1.35E+02	1.35E+02
160	Arizona Elect	Apache Station	04003	32.0619	-109.8931	2.76E+09	6.17E+06	7.67E+06	8.23E+05	5.16E+04	1.47E+07	2.32E+03	1.00E+03	2.64E+03	1.60E+02
165	Grand River Di	GRODA	40097	36.1506	-95.2889	6.72E+09	9.30E+07	8.25E+05	2.86E+07	8.86E+04	1.22E+08	5.05E+03	1.85E+03	4.77E+03	2.27E+02
207	JEA	St Johns River	12031	30.4311	-81.5508	6.65E+09	3.41E+07	2.60E+06	1.24E+05	3.40E+07	2.89E+03	7.77E+02	2.96E+03	1.33E+02	1.33E+02
298	NRG Energy	Limestone	48293	31.4108	-96.2617	1.26E+10	4.82E+07	2.48E+07	8.15E+06	4.11E+05	8.16E+07	2.71E+03	2.04E+03	5.03E+03	2.53E+02
465	Public Service	Arapahoe	08031	39.6700	-105.0208	8.92E+08	8.37E+06	5.96E+06	7.71E+06	5.70E+05	2.26E+07	3.47E+03	2.55E+03	5.35E+04	2.61E+03
468	Public Service	Cameo	08077	39.1486	-108.3189	4.87E+08	8.62E+06	1.70E+06	3.05E+05	3.06E+04	1.06E+07	2.80E+03	1.22E+03	3.80E+03	2.49E+02
468	Public Service	Cherokee	08001	39.8093	-104.9603	4.98E+09	2.02E+07	2.35E+07	5.96E+06	4.55E+05	5.01E+07	2.87E+03	3.00E+03	9.00E+03	5.54E+02
470	Public Service	Comanche	08011	38.2081	-104.5747	4.38E+09	3.820E1	3.138E+07	8.13E+06	4.54E+04	4.54E+07	3.33E+03	1.41E+03	1.33E+02	1.33E+02
477	Public Service	Valmont	08013	40.0195	-105.2020	1.50E+09	2.17E+06	4.21E+06	7.57E+05	6.77E+04	7.20E+06	2.47E+03	1.67E+03	4.24E+03	3.27E+02
492	Colorado Sprin	Martin Drake	08041	38.8244	-104.8331	2.03E+09	2.44E+07	8.38E+06	1.06E+06	8.41E+04	3.40E+07	2.67E+03	1.70E+03	5.23E+03	4.06E+02
525	Public Service	Hayden	08107	40.4856	-107.1850	3.65E+09	8.15E+06	1.09E+07	1.51E+06	1.21E+05	2.06E+07	2.82E+03	1.35E+03	2.91E+03	1.90E+02
527	Tn-State G & T	Nuclia	08085	38.2387	-108.5083	7.34E+08	3.72E+06	2.18E+06	1.60E+05	1.78E+04	6.07E+06	2.65E+03	1.13E+03	3.01E+03	2.03E+02
564	Oriano Unitt	Stanton Energy	12095	28.4836	-81.1686	6.16E+09	5.78E+07	4.41E+06	5.78E+07	3.71E+05	3.71E+07	4.41E+03	5.90E+02	4.62E+03	1.93E+02
568	PSEG Fossil	Bridgeport Sta	09001	41.1684	-73.1845	2.70E+09	1.14E+07	3.71E+06	2.35E+06	1.56E+05	1.76E+07	4.18E+03	1.89E+03	8.88E+03	4.48E+02
593	Connecticut	EnergEdge Moor	10003	39.7372	-75.5033	1.12E+09	7.44E+07	2.89E+06	5.95E+06	5.21E+05	8.69E+07	1.03E+04	1.51E+03	1.20E+03	1.20E+03
594	NRG Energy	Indian River Gr	10005	38.5833	-75.2333	3.49E+09	1.99E+08	1.14E+07	2.02E+07	1.07E+06	2.31E+08	9.58E+03	1.62E+03	1.32E+04	6.17E+02
602	Constellation	EBrandon Shore	24003	39.1792	-76.5383	8.33E+09	3.01E+08	1.61E+07	1.95E+07	1.09E+06	3.37E+08	7.20E+03	1.37E+03	1.11E+04	5.26E+02
628	Progress Energy	Crystal River	12017	28.9594	-82.7003	1.58E+10	3.28E+08	2.10E+07	1.92E+07	8.16E+05	3.69E+08	3.21E+03	5.43E+02	4.20E+03	1.65E+02
641	Gulf Power Co	Crist	12033	30.5661	-87.2289	4.99E+09	8.90E+07	8.93E+06	8.92E+06	4.38E+05	1.04E+08	3.96E+03	7.18E+02	4.26E+03	1.90E+02
642	Gulf Power Co	Scholz	12063	30.6689	-84.8869	3.65E+08	1.71E+07	8.07E+05	6.41E+05	3.35E+04	1.87E+07	3.52E+03	6.05E+02	4.36E+03	1.96E+02
643	Gulf Power Co	Lansing Smith	12005	30.2689	-85.7003	2.36E+09	5.97E+07	3.62E+06	2.44E+06	1.22E+05	6.58E+07	3.22E+03	6.49E+02	3.93E+03	1.73E+02
645	Tampa Electric	Big Bend	12057	27.7944	-82.4036	7.19E+09	2.06E+07	2.68E+07	1.18E+08	1.33E+06	5.99E+03	8.64E+02	1.53E+04	5.23E+02	5.23E+02
663	Gainesville Re	Deerhaven G	12001	29.7586	-82.3883	1.45E+09	2.84E+07	2.62E+06	1.77E+06	9.80E+04	3.29E+07	3.54E+03	6.78E+02	5.20E+03	2.41E+02
676	Lakeland City	CD Mcintosh	12105	28.0889	-81.9256	2.26E+09	3.07E+07	5.95E+06	3.29E+06	1.77E+05	4.03E+07	3.07E+03	9.03E+03	3.23E+02	3.23E+02
703	Georgia Power	Lowline	13015	33.1256	-84.9192	2.23E+10	9.06E+08	2.23E+07	5.04E+07	2.22E+06	9.84E+08	4.86E+03	9.00E+02	2.66E+02	2.66E+02
708	Georgia Power	Hammond	13115	34.2533	-85.3456	4.35E+09	1.94E+08	5.92E+06	8.89E+06	5.21E+05	2.10E+08	4.92E+03	8.77E+02	5.78E+03	2.79E+02
709	Georgia Power	Harlee Branch	13237	33.1942	-83.2994	9.78E+09	3.99E+08	1.45E+07	2.08E+07	1.29E+06	4.35E+08	4.40E+03	7.23E+02	4.66E+03	2.23E+02
710	Georgia Power	Jack McDonou	13067	33.8244	-84.4750	3.64E+09	1.29E+08	5.17E+06	8.44E+06	4.63E+05	1.44E+08	4.71E+03	1.19E+03	5.57E+03	2.69E+02
727	Georgia Power	Mitchell	13095	31.4444	-84.1322	3.63E+08	3.39E+07	1.95E+06	1.39E+06	7.66E+04	3.73E+07	4.34E+03	5.17E+03	5.17E+03	2.53E+02
728	Georgia Power	Yates	13077	33.4622	-84.8986	4.58E+09	1.17E+07	1.21E+07	1.06E+06	6.52E+08	1.06E+07	6.21E+03	9.37E+02	6.37E+02	6.37E+02
733	Georgia Power	Kraft	13051	32.1486	-81.1458	1.11E+09	2.79E+07	2.09E+06	1.87E+06	1.32E+05	3.20E+07	4.43E+03	6.11E+02	5.15E+03	2.59E+02
856	AmerenEnergy	D Edwards	17143	40.5958	-89.6631	4.44E+09	2.29E+08	1.70E+07	2.00E+07	1.03E+06	2.67E+08	6.58E+03	2.60E+03	9.95E+03	4.58E+02
861	AmerenEnergy	Hutsonville	17033	39.1333	-87.6597	7.53E+08	5.89E+07	3.72E+07	9.47E+06	4.57E+05	7.20E+07	5.91E+03	2.01E+03	8.48E+03	4.05E+02
864	AmerenEnergy	Merodisa	17137	39.8194	-90.5647	9.16E+09	3.05E+07	6.05E+07	9.36E+06	5.59E+05	6.69E+07	6.69E+03	8.05E+02	8.05E+02	8.05E+02
867	Edison Missor	Crawford	17031	41.8278	-87.7236	2.96E+09	5.91E+07	3.80E+06	7.98E+06	6.90E+05	7.15E+07	6.40E+03	1.70E+03	1.75E+04	8.21E+02
876	Dominion Ene	Kinciad Gener	17021	39.5942	-89.4983	6.14E+09	2.98E+07	1.10E+08	3.66E+06	1.95E+05	1.44E+08	6.29E+03	2.09E+03	8.20E+03	3.93E+02
879	Edison Missor	Powerton	17179	40.5408	-89.6786	9.47E+09	1.37E+08	5.63E+07	7.06E+06	4.75E+05	2.00E+08	5.80E+03	1.89E+03	7.38E+03	3.56E+02
883	Edison Missor	Waukegan	17097	42.3833	-87.8133	4.72E+09	7.80E+07	7.22E+06	8.16E+06	6.65E+05	9.39E+07	6.40E+03	1.57E+03	1.67E+04	8.45E+02
884	Edison Missor	Will County	17197	41.6344	-88.0592	5.24E+09	1.51E+08	1.40E+07	2.07E+07	1.43E+06	1.87E+08	9.35E+03	1.80E+03	4.71E+04	2.28E+03
886	Edison Missor	Fisk Street	17031	41.8508	-87.6533	2.06E+09	2.06E+07	7.89E+06	4.79E+06	2.89E+05	1.49E+07	3.86E+03	3.86E+03	1.84E+03	1.84E+03
887	Electric Energy	Joppa Steam	17127	37.2103	-88.8606	7.86E+09	1.29E+08	8.43E+06	3.32E+06	1.82E+05	4.99E+03	5.53E+03	5.02E+03	2.39E+02	2.39E+02
889	Dynegy Inc	Baldwin Energy	17157	38.2050	-89.8550	1.26E+10	1.19E+08	6.83E+06	9.04E+06	7.05E+05	1.37E+08	4.97E+03	1.40E+03	5.39E+03	2.57E+02
891	Dynegy Inc	Havana	17125	40.2797	-90.0775	2.88E+09	4.19E+07	1.01E+06	3.99E+06	2.22E+05	4.71E+07	5.85E+03	1.79E+03	3.64E+02	3.64E+02
892	Dynegy Inc	Hennepin Pow	17155	41.3017	-89.3136	1.98E+09	2.88E+07	2.87E+06	2.09E+06	1.65E+05	3.39E+07	6.24E+03	2.17E+03	9.52E+03	4.58E+02
897	Dynegy Inc	Vermilion	17083	40.1781	-87.7433	2.06E+09	7.81E+07	7.81E+07	3.61E+06	1.12E+06	8.75E+07	5.49E+03	6.05E+02	2.11E+03	2.11E+03
898	Dynegy Inc	Wood River	17119	38.8639	-90.1325	2.93E+09	4.88E+07	5.59E+06	4.99E+06	2.98E+05	9.95E+07	6.73E+03	2.43E+03	1.35E+04	6.25E+02
976	Southern Illino	Marion	17199	37.6206	-88.9550	1.73E+09	4.05E+07	8.48E+06							

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1355 Kentucky UtilIRE W Brown	21167	37.7889	-84.7139	3.22E+09	2.72E+08	5.87E+06	1.45E+07	7.33E+05	2.92E+08	6.33E+03	1.01E+03	7.17E+03	3.42E+02
1356 Kentucky UtiliGHent	21041	38.7497	-85.0350	1.26E+10	3.33E+08	1.87E+07	1.56E+07	8.59E+05	3.68E+08	6.63E+03	1.35E+03	7.23E+03	3.49E+02
1357 Kentucky UtiliGreen River	21177	37.3636	-87.1211	6.91E+07	1.01E+07	9.01E+07	4.25E+06	6.21E+06	9.65E+07	5.21E+03	3.11E+03	6.01E+03	3.13E+02
1361 Kentucky UtiliTyronne	21239	38.0475	-84.8494	3.56E+08	2.28E+07	1.16E+06	1.48E+06	7.75E+04	2.54E+07	1.72E+03	1.20E+03	1.08E+04	1.08E+02
1363 Louisville Gas (Cane Run	21111	38.1828	-85.8894	3.67E+09	1.49E+08	1.22E+07	7.35E+06	4.79E+05	1.69E+08	7.90E+03	1.73E+03	1.51E+04	7.54E+02
1364 Louisville Gas (Mill Creek	21111	38.0531	-85.9100	1.01E+10	1.67E+08	2.08E+07	1.10E+07	6.07E+05	1.99E+08	6.94E+03	1.60E+03	9.94E+03	4.91E+02
1374 Henderson Ct Henderson I	21059	37.8425	-87.5911	7.46E+07	1.76E+07	1.17E+07	2.83E+05	1.25E+04	1.90E+07	7.78E+03	2.77E+03	1.52E+04	6.51E+02
1376 Owensboro CHilmer Smith	21101	37.7958	-87.0597	2.17E+09	3.11E+07	1.33E+07	1.89E+06	1.14E+05	4.44E+07	5.34E+03	1.50E+03	5.80E+03	2.84E+02
1378 Tennessee Val Paradise	21177	37.2608	-86.9798	4.17E+08	1.41E+07	1.40E+07	3.94E+07	6.41E+07	4.94E+08	6.22E+03	1.94E+03	5.17E+03	1.10E+03
1379 Tennessee Val Shawnee	21145	37.1517	-88.7750	9.29E+09	1.88E+08	3.04E+07	3.54E+06	1.86E+05	2.23E+08	5.00E+03	1.49E+03	4.98E+03	2.37E+02
1381 Western Kents.Kenneth C Col	21091	37.9628	-86.7917	2.77E+09	3.29E+08	6.82E+06	1.96E+07	1.09E+06	3.57E+08	5.79E+03	1.33E+03	7.02E+03	3.54E+02
1384 East Kentucky Cooper	21199	37.0000	-84.5917	2.00E+09	1.23E+08	3.90E+06	5.92E+06	3.38E+05	1.33E+08	5.26E+03	8.45E+02	5.28E+03	2.54E+02
1385 East Kentucky Dale	21049	37.8807	-84.2634	1.23E+09	7.33E+07	4.33E+06	3.31E+06	1.95E+05	8.09E+07	6.97E+03	1.09E+03	9.20E+03	4.44E+02
1393 Energy Gulf S/S Nelson	22019	30.2861	-93.2917	3.21E+09	4.38E+07	5.42E+06	2.59E+06	1.44E+05	5.20E+07	3.31E+03	1.18E+03	4.20E+03	1.80E+02
1552 Constellation IC P Crane	24005	39.3269	-76.3650	2.12E+09	2.77E+08	1.07E+07	2.67E+07	1.21E+06	3.15E+08	8.39E+03	1.30E+03	1.38E+04	5.98E+02
1554 Constellation (Herbert A Waq	24003	39.1781	-76.5268	2.87E+09	1.59E+08	6.57E+06	1.57E+07	4.74E+05	1.76E+08	7.21E+03	1.37E+03	1.11E+04	5.26E+02
1570 Allegheny Ene R Paul Smith P	24043	39.5956	-77.8286	3.88E+08	3.46E+07	1.47E+06	4.56E+06	2.82E+05	4.10E+07	1.03E+04	1.60E+03	2.22E+04	1.08E+03
1571 Mirant Corp Chalk Point Lt	24033	38.5444	-76.6861	3.89E+09	3.09E+08	1.14E+07	3.82E+07	1.86E+06	3.61E+08	6.43E+03	1.17E+03	9.57E+03	4.58E+02
1572 Mirant Corp Dickerson	24031	39.2086	-77.4644	3.33E+09	2.96E+08	7.86E+06	5.59E+07	2.85E+06	3.63E+08	7.84E+03	1.40E+03	1.64E+04	8.35E+02
1573 Mirant Corp Morgantown	24017	38.3592	-76.9767	6.61E+09	5.15E+07	1.49E+07	2.48E+07	1.83E+06	5.57E+08	6.48E+03	1.11E+03	9.84E+03	4.80E+02
1606 Energy Capital Mount Tom	25013	42.2814	-72.6053	1.03E+09	1.35E+06	2.47E+06	1.32E+05	1.32E+05	2.14E+07	4.22E+03	9.43E+02	1.13E+04	5.58E+02
1613 NRG Energy Somersset State	25005	41.7370	-71.1460	7.46E+08	2.08E+07	1.04E+06	2.51E+06	1.41E+05	2.46E+07	4.91E+03	1.14E+03	1.33E+04	6.46E+02
1619 Dominion EnerBrayton Point	25005	41.7125	-71.1914	8.04E+09	2.05E+08	1.39E+07	3.16E+07	1.75E+06	2.52E+08	6.83E+03	1.40E+03	2.11E+04	1.01E+03
1626 Dominion EnerSalem Harbor	25009	42.5267	-70.8792	2.17E+09	3.20E+07	2.06E+06	6.11E+06	3.90E+05	4.06E+07	3.49E+03	9.53E+02	9.71E+03	4.76E+02
1695 Consumers En B C Cobd	26121	43.2542	-86.2471	2.01E+09	6.96E+07	4.03E+06	3.21E+06	1.86E+05	7.70E+07	5.64E+03	1.33E+03	6.43E+03	3.11E+02
1740 Consumers En J H Campbell	26139	42.9103	-86.2036	4.91E+08	2.54E+07	2.54E+06	9.94E+05	2.36E+05	2.86E+08	6.28E+03	1.39E+03	6.32E+03	3.19E+02
1723 Consumers En J R Whiting	26115	41.7917	-83.4486	2.32E+09	8.27E+07	4.46E+06	1.35E+07	1.12E+06	1.02E+08	7.66E+03	1.36E+03	1.31E+04	6.42E+02
1731 Detroit Edison Harbor Beach	26063	43.8492	-82.6522	3.55E+08	8.76E+06	8.76E+05	1.52E+06	2.01E+05	1.23E+07	4.91E+03	8.23E+02	4.76E+03	2.25E+02
1733 Detroit Edison Monroe	26115	41.8917	-83.3461	1.87E+10	7.25E+08	4.30E+07	2.28E+07	1.15E+06	7.91E+08	6.59E+03	1.22E+03	3.43E+04	6.65E+02
1740 Detroit Edison River Rouge	26163	42.2733	-83.1131	2.88E+09	8.57E+07	5.05E+06	4.19E+06	2.14E+05	9.51E+07	7.47E+03	1.34E+03	1.77E+04	3.68E+02
1745 Detroit Edison Trenton Charan	26163	42.1236	-83.1811	6.06E+09	7.51E+08	4.26E+07	2.46E+08	1.24E+06	5.24E+08	4.22E+03	7.71E+03	1.30E+03	3.36E+03
1769 We Energies Presque Isle	26103	46.5604	-87.3933	3.42E+09	7.39E+07	6.85E+06	2.26E+06	1.16E+05	8.31E+07	3.88E+03	8.83E+02	3.36E+03	1.65E+02
1825 Grand Haven (J B Sims	26139	43.0722	-86.2342	4.39E+08	9.74E+06	1.61E+06	1.13E+06	7.41E+04	1.26E+07	9.26E+03	2.71E+03	1.82E+04	8.88E+02
1830 Holland City of James De Your	26139	42.7956	-86.1133	3.04E+08	8.09E+06	1.04E+06	1.13E+06	7.79E+04	1.03E+07	9.25E+03	2.71E+03	1.82E+04	8.87E+02
1831 Lansing City of Eckert Station	26065	42.7183	-84.5586	1.50E+09	5.41E+07	7.04E+06	2.39E+06	2.36E+05	6.39E+07	7.89E+03	2.06E+03	1.32E+04	7.09E+02
1832 Lansing City of Erickson State	26045	42.6919	-84.6572	9.81E+08	2.36E+07	2.06E+06	1.30E+06	9.57E+04	2.71E+07	7.59E+03	1.69E+03	1.16E+04	5.98E+02
1843 Marquette Co Shras	26103	46.5314	-87.3917	3.04E+08	1.49E+06	1.49E+06	3.17E+05	1.57E+05	1.97E+08	4.04E+03	9.97E+02	4.04E+03	2.01E+02
1866 Wyandotte M/Wyandotte	26163	42.2081	-83.1470	2.67E+08	2.19E+07	1.38E+06	3.06E+06	1.65E+05	2.65E+07	1.43E+04	2.11E+03	5.33E+04	2.67E+03
1891 Minnesota Po/Syl Laskin	27137	47.5306	-92.1619	6.96E+08	1.01E+07	2.93E+06	6.46E+05	3.57E+04	1.38E+07	5.52E+03	1.14E+03	4.21E+03	2.11E+02
1893 Minnesota Po/CJay Boswell	27061	47.2603	-93.6531	7.24E+09	1.09E+08	1.80E+07	3.55E+06	1.51E+05	1.32E+08	5.56E+03	1.26E+03	3.92E+03	1.97E+02
1904 Northern State/Black Dog	27037	44.8108	-93.2501	1.66E+09	2.17E+07	1.33E+07	5.21E+05	7.42E+04	3.56E+07	5.74E+03	1.73E+03	5.18E+03	2.74E+02
1912 Northern State/High Bridge	27123	44.9331	-93.1075	1.30E+09	1.87E+07	8.50E+06	2.89E+05	1.94E+05	2.76E+07	5.39E+03	1.65E+03	4.85E+03	2.59E+02
1915 Northern State/Allen S King	27163	45.0300	-92.7786	1.62E+08	1.68E+07	5.62E+05	6.62E+04	1.49E+05	1.49E+08	5.63E+03	1.57E+03	4.78E+03	2.45E+02
1927 Northern State/Riverside	27053	45.0203	-93.2753	2.13E+09	1.57E+08	9.46E+07	1.54E+06	1.61E+05	2.53E+08	1.25E+04	7.44E+03	2.62E+04	2.06E+03
1943 Otter Tail Pow Hoot Lake	27111	46.2900	-96.0428	9.30E+08	1.69E+07	3.66E+06	1.71E+05	9.56E+04	2.07E+07	4.97E+03	1.67E+03	4.00E+03	2.05E+02
1961 Austin City of Austin North	27099	43.6978	-92.9633	1.32E+08	1.87E+07	1.73E+06	1.11E+05	5.46E+03	2.05E+07	7.42E+03	8.54E+03	4.20E+02	1.94E+02
2049 Mississippi Po/Jack Watson	28047	30.4408	-89.0265	3.74E+09	6.39E+07	9.26E+06	4.00E+06	1.97E+05	7.74E+07	2.75E+03	8.00E+02	4.61E+03	1.59E+02
2076 Empire District/Esbury	29097	37.3596	-94.5913	6.54E+08	1.23E+07	2.38E+07	1.23E+07	7.86E+05	7.86E+05	1.28E+03	2.04E+03	2.04E+03	2.04E+03
2079 Kansas City Po Hawthorn	29095	39.1317	-94.4739	3.71E+09	3.49E+06	2.44E+06	1.74E+06	1.46E+05	7.81E+06	1.63E+03	1.61E+03	4.15E+03	2.00E+02
2080 Kansas City Po Montrose	29083	38.3108	-93.9331	3.33E+09	8.25E+07	1.34E+07	1.42E+06	1.16E+05	9.75E+07	5.26E+03	2.06E+03	5.41E+03	2.55E+02
2094 Aquila Network Sibley	29095	39.1778	-94.1861	2.98E+09	2.88E+07	2.71E+07	1.98E+06	5.80E+07	2.26E+08	2.46E+03	3.53E+03	1.21E+04	5.64E+02
2098 Aquila Network Lake Road	29021	39.7278	-94.8786	5.93E+08	6.92E+06	1.14E+07	5.05E+05	2.71E+04	1.89E+07	2.21E+03	3.62E+03	9.93E+03	4.40E+02
2103 AmerenUE Ladisde	29071	38.5583	-90.8366	2.96E+09	1.58E+08	6.15E+07	2.86E+06	1.26E+06	2.80E+08	5.80E+03	1.60E+03	1.69E+04	1.59E+02
2104 AmerenUE Meramec	29189	38.4017	-90.3358	5.66E+09	1.17E+08	2.36E+07	4.96E+06	3.82E+05	1.46E+08	6.51E+03	3.05E+03	1.17E+04	5.41E+02
2107 AmerenUE Sioux	29183	38.9158	-90.2917	6.55E+09	3.03E+08	1.71E+07	8.52E+06	4.20E+05	3.29E+08	5.92E+03	2.02E+03	6.59E+03	3.18E+02
2123 Columbia City Columbia	29019	38.9658	-92.3175	7.27E+07	5.91E+06	7.52E+05	5.36E+03	2.59E+02	6.66E+06	5.91E+03	2.71E+03	7.99E+03	3.86E+02
2132 Independence Blue Valley	29095	39.0919	-94.3261	3.22E+08	5.28E+07	8.61E+06	1.08E+07	5.54E+05	7.28E+07	4.58E+03	7.59E+03	3.14E+04	1.42E+03
2161 Springfield City James River	PC29077	37.1086	-93.2592	1.65E+09	3.55E+07	1.27E+07	9.45E+05	1.37E+05	4.92E+07	6.66E+03	3.02E+03	1.08E+04	4.54E+02
2167 Associated Ene New Madrid	29143	36.5147	-89.5617	7.09E+07	4.76E+07	4.97E+06	1.29E+06	4.97E+06	4.97E+06	7.08E+03	1.49E+03	4.27E+03	1.49E+03
2168 Associated Ene Thomas Hill	29175	39.5531	-92.6392	7.79E+09	2.97E+07	2.94E+07	2.12E+06	1.42E+05	6.13E+07	1.73E+03	1.78E+03	4.27E+03	2.02E+02
2169 Central Electric/Chamosi	29151	38.6853	-91.7556	4.17E+08	3.33E+07	4.77E+06	1.61E+05	9.34E+03	3.82E+07	6.04E+03	2.23E+03	7.91E+03	3.86E+02
2187 PPL Generatio J E Corette Pia	30111	45.7747	-108.4803	1.01E+09	6.56E+06	2.05E+06	2.68E+05	1.81E+04	8.89E+06	2.28E+03	1.24E+03	2.71E+03	1.56E+02
2277 Nebraska Publ/Sheldon	31109	40.5589	-96.7842	1.55E+09	1.15E+07	2.42E+07	3.60E+05	2.73E+04	3.61E+07	2.24E+03	2.58E+03	7.42E+03	3.77E+02
2324 Nebraska Public North Omaha	31223	41.3287	-95.9505	1.30E+09	3.10E+07	1.14E+07	1.55E+06	1.14E+05	4.24E+07	3.10E+03	1.55E+03	4.85E+03	1.71E+03
2328 Nevada Power/Reid Gardner	32006	36.6531	-114.6364	3.92E+09	4.34E+06	8.03E+06	3.89E+06	2.91E+05	1.65E+07	2.07E+03	6.72E+03	8.91E+02	4.85E+02
2341 Southern Calif/Mohave	32003	35.1458	-114.5917	1.05E+10	7.14E+07	1.87E+07	5.03E+06	3.62E+05	9.56E+07	1.72E+03	9.01E+02	2.01E+03	1.29E+02
2364 Public Service Merrimack	33013	43.1411	-71.4692	3.12E+09	9.97E+07	2.62E+06	1.13E+08	2.95E+03	5.22				

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2835 FirstEnergy GeAshtabula	39007	41.9083	-80.7667	1.41E+09	3.02E+07	1.90E+06	1.00E+06	8.95E+04	3.32E+07	7.23E+03	1.19E+03	1.18E+04	5.22E+02
2836 Reliant Energy Avon Lake	39093	41.5042	-82.0500	3.53E+09	2.89E+08	7.35E+06	1.86E+07	3.15E+08	3.15E+08	1.07E+03	1.07E+03	9.12E+03	4.18E+02
2837 FirstEnergy GeEaston	39085	41.5713	-81.6432	1.87E+09	1.43E+08	5.43E+06	3.40E+07	1.55E+06	1.55E+06	7.28E+03	1.52E+03	1.17E+03	1.43E+02
2838 FirstEnergy GeLake Shore	39035	41.5333	-81.6375	9.95E+08	3.22E+07	4.75E+06	2.68E+05	4.73E+06	2.84E+05	4.20E+07	1.08E+04	2.56E+03	1.12E+03
2840 Columbus SouConesville	39031	40.1842	-81.8811	9.71E+09	7.51E+08	2.14E+07	5.67E+07	2.76E+06	8.31E+08	7.04E+03	1.01E+03	9.02E+03	4.13E+02
2843 Columbus SouPicway	39129	39.7933	-83.0097	2.39E+08	5.50E+07	1.29E+06	4.43E+06	2.25E+05	5.88E+07	8.06E+03	1.83E+03	1.29E+04	6.42E+02
2845 Dayton Power O H Hutchings	39113	39.6094	-84.2931	6.65E+08	5.88E+07	2.58E+06	6.11E+06	3.56E+05	7.28E+07	1.01E+04	2.71E+03	6.01E+03	9.47E+02
2880 Dayton Power J M Stuart	39001	38.6361	-83.6939	1.44E+10	6.67E+08	2.33E+07	3.08E+07	1.76E+06	7.24E+08	6.28E+03	9.78E+02	2.04E+04	3.04E+02
2861 Reliant Energy Niles	39155	41.1667	-80.7500	1.83E+09	1.34E+08	6.04E+06	1.34E+06	1.18E+05	1.18E+05	1.68E+03	1.43E+03	1.54E+04	6.87E+02
2864 FirstEnergy GeR E Burger	39013	39.9004	-80.7608	1.99E+09	2.76E+08	5.45E+06	2.36E+07	1.10E+06	3.05E+08	7.34E+03	1.02E+03	9.77E+03	4.38E+02
2866 FirstEnergy GeW H Sammis	39081	40.5308	-80.6311	1.47E+10	7.34E+08	2.56E+07	5.65E+07	2.83E+06	8.19E+08	6.89E+03	1.02E+03	9.24E+03	4.19E+02
2872 Ohio Power CcMuskogum Rr	39167	39.5908	-81.6797	9.78E+09	8.97E+08	1.38E+07	4.24E+07	2.03E+06	9.55E+08	6.66E+03	8.80E+02	7.32E+03	3.35E+02
2876 Ohio Valley EekKyger Creek	39053	38.9161	-82.1281	7.65E+09	4.73E+08	1.57E+07	3.07E+07	1.57E+06	5.21E+08	6.52E+03	8.51E+02	6.72E+03	3.12E+02
2878 FirstEnergy GeBay Shore	39095	41.6925	-83.4375	1.31E+09	1.20E+07	1.31E+07	5.75E+05	5.07E+05	1.41E+08	1.89E+03	1.89E+03	7.07E+03	5.93E+02
2917 Hamilton City+Hamilton	39017	39.4069	-84.5542	2.88E+08	1.22E+07	8.80E+05	6.43E+05	3.47E+04	1.37E+07	9.64E+03	1.99E+03	2.23E+04	1.16E+03
2952 Oklahoma GasMuskogee	40101	35.7617	-95.2847	1.02E+10	6.59E+07	1.53E+07	1.04E+06	1.15E+05	8.25E+07	5.12E+03	1.78E+03	4.52E+03	2.16E+02
2963 Public Service Northeastern	40131	36.4317	-95.7008	6.56E+09	7.54E+07	1.22E+07	7.40E+05	4.24E+04	8.83E+07	4.88E+03	1.83E+03	4.34E+03	2.10E+02
3098 Reliant Energy Elrama Power	42125	40.2500	-79.9167	1.58E+09	2.41E+07	5.60E+06	3.10E+06	2.62E+05	3.31E+07	1.19E+03	7.51E+03	9.88E+03	4.34E+02
3113 Reliant Energy Portland	42095	40.9100	-75.0789	2.16E+09	3.63E+08	7.08E+06	5.07E+07	2.75E+06	4.24E+08	1.25E+04	2.21E+03	3.24E+04	1.52E+03
3115 Reliant Energy Titus	42011	40.3061	-75.9081	2.16E+09	2.47E+08	7.81E+07	3.81E+07	1.86E+06	2.94E+08	3.21E+03	9.44E+02	4.28E+04	1.88E+03
3118 Reliant Energy Conemaugh	42063	40.3842	-79.0611	1.29E+10	5.10E+07	1.86E+07	1.52E+07	1.20E+06	8.60E+07	7.19E+03	9.44E+02	4.39E+02	4.39E+02
3122 Edison MissiorHomer CityStr	42063	40.5110	-79.1968	1.36E+10	9.42E+08	1.73E+07	7.44E+07	3.91E+06	1.04E+09	7.13E+03	9.47E+02	9.47E+03	4.40E+02
3130 Reliant Energy Seward	42063	40.4081	-79.0339	2.79E+09	5.41E+07	1.37E+06	1.88E+07	1.05E+06	7.54E+07	7.11E+03	9.44E+02	9.44E+03	4.39E+02
3131 Reliant Energy Shawville	42033	41.0670	-78.3656	1.01E+09	3.32E+08	6.96E+06	2.28E+07	1.20E+06	3.63E+08	7.06E+03	1.01E+03	9.10E+03	4.27E+02
3136 Reliant Energy Keystone	42005	40.6604	-79.3411	1.35E+10	1.28E+09	1.43E+07	8.47E+07	4.27E+06	1.39E+09	7.17E+03	1.02E+03	8.80E+03	4.10E+02
3158 Reliant Energy New Castle	42073	40.3681	-80.9378	1.31E+09	2.25E+08	1.31E+07	1.31E+07	1.89E+05	1.35E+05	9.56E+03	1.37E+03	9.03E+02	9.03E+02
3140 PPL Generatio PPL Brunner Is	42133	40.1000	-76.6917	1.01E+10	7.34E+08	1.49E+07	5.56E+07	3.40E+06	8.09E+08	7.02E+03	1.06E+03	1.16E+04	5.44E+02
3148 PPL Generatio PPL Martins Cr	42095	40.7917	-75.1083	7.45E+08	1.93E+06	1.93E+06	1.49E+07	8.74E+05	9.74E+07	7.70E+03	1.19E+03	1.99E+04	9.60E+02
3149 PPL Generatio PPL Montour	42093	41.0711	-76.6742	1.03E+10	8.21E+08	1.15E+07	8.25E+07	4.28E+06	9.19E+08	6.44E+03	1.18E+04	8.94E+02	5.12E+02
3152 Corona Power Sunbury	42109	40.8361	-76.8250	1.62E+09	1.65E+08	2.43E+06	6.66E+06	3.69E+05	1.75E+08	6.00E+03	8.46E+02	4.21E+02	4.21E+02
3159 Exelon Energy Cromby Gener	42029	40.1514	-75.5306	4.37E+08	4.37E+07	3.37E+07	3.05E+06	3.05E+06	3.05E+06	1.27E+03	1.27E+03	3.32E+04	1.40E+02
3161 Exelon Energy Edystowne Ger	42045	39.8580	-75.3230	2.35E+09	7.61E+07	6.69E+06	1.38E+07	9.56E+05	9.75E+07	1.18E+04	1.29E+03	3.80E+04	1.71E+03
3176 UGI DevelopmHunlock Powe	42079	41.2033	-76.0683	1.97E+08	1.09E+06	1.09E+06	3.78E+06	1.18E+05	6.11E+07	1.24E+04	2.46E+03	2.93E+04	1.31E+03
3178 Allegheny Ene Armstrong Pow	42005	40.9289	-79.4658	2.01E+09	2.19E+08	3.57E+06	1.47E+07	7.38E+05	2.38E+08	7.15E+03	1.01E+03	8.87E+03	4.09E+02
3179 Allegheny Ene Hatfields Ferr	42059	39.8528	-79.9278	8.67E+09	1.03E+09	1.68E+07	7.32E+07	4.17E+06	1.12E+09	7.08E+03	9.60E+02	8.91E+03	4.14E+02
3181 Allegheny Ene Mitchell Pow	42125	40.2228	-79.9694	1.73E+09	1.79E+07	3.08E+06	6.57E+06	2.82E+05	2.78E+07	1.18E+04	1.26E+03	2.87E+04	1.13E+03
3251 Progress Energy B Robinson	45031	34.4017	-80.1589	8.01E+08	2.25E+07	2.16E+06	4.70E+06	2.61E+05	7.04E+07	6.56E+03	1.07E+03	7.56E+03	3.40E+02
3264 Duke CarolinaW S Lee	45007	34.6022	-82.4350	1.45E+09	3.79E+06	1.01E+07	5.76E+05	1.03E+08	7.89E+07	1.58E+03	1.58E+03	1.53E+04	6.58E+02
3280 South CarolinaCanadys Stean	45029	33.0603	-80.6214	2.18E+09	8.96E+07	3.24E+06	1.08E+06	7.05E+04	9.93E+07	4.58E+03	6.58E+02	5.86E+03	2.71E+02
3287 South CarolinaMcMeekin	45063	34.0533	-81.2178	1.79E+09	8.65E+07	3.67E+06	9.17E+06	4.57E+05	9.98E+07	6.00E+03	1.17E+03	8.61E+03	4.22E+02
3295 South CarolinaUrquhart	45003	33.4350	-81.9111	6.02E+08	3.34E+07	9.75E+05	2.54E+06	1.56E+05	3.71E+07	5.62E+03	1.10E+03	7.83E+03	3.77E+02
3297 South CarolinaWaterere	45079	33.9264	-80.6218	1.89E+08	5.76E+06	1.89E+06	5.76E+06	1.26E+06	3.16E+08	5.03E+02	8.61E+02	3.68E+02	3.68E+02
3298 South CarolinaWilliams	45015	33.0163	-79.9285	4.79E+09	1.11E+08	4.87E+06	3.98E+06	1.96E+05	1.25E+08	4.13E+03	7.12E+02	4.15E+03	1.92E+02
3317 South CarolinaDolphus M Gri	45051	33.8253	-79.0528	1.13E+09	6.45E+07	2.87E+06	4.50E+06	2.40E+05	7.21E+07	5.00E+03	9.94E+02	6.00E+03	2.67E+02
3319 South CarolinaJefferies	45015	33.2422	-79.9875	1.91E+09	1.20E+08	3.67E+06	1.01E+07	1.79E+05	1.34E+08	4.81E+03	7.07E+02	6.81E+03	3.04E+02
3325 Black Hills PowBen French	46103	44.0872	-103.2614	1.52E+08	3.08E+06	1.04E+06	6.25E+04	7.79E+03	4.19E+06	3.93E+03	1.14E+03	2.81E+03	1.37E+02
3335 Tennessee Val Allen Stean St	47157	35.0742	-90.1439	5.15E+09	1.45E+08	2.53E+07	4.19E+06	3.63E+05	1.75E+08	6.07E+03	2.02E+03	8.83E+03	4.04E+02
3336 Tennessee Val Bull Run	47021	36.0211	-84.1567	8.41E+08	2.95E+07	1.05E+07	1.05E+07	8.09E+05	2.35E+08	6.56E+03	1.07E+03	7.92E+02	2.61E+02
3399 Tennessee Val Cumberland	47161	36.3903	-87.6539	1.63E+10	8.95E+07	2.76E+07	1.10E+07	7.11E+05	1.28E+08	5.12E+03	1.01E+03	4.91E+03	2.37E+02
3403 Tennessee Val Gallatin	47165	36.3156	-86.4006	7.48E+09	1.39E+08	7.99E+06	3.13E+06	1.63E+05	1.52E+08	5.37E+03	1.16E+03	5.62E+03	2.70E+02
3405 Tennessee Val John Sevier	47073	36.3767	-82.9639	4.96E+09	2.00E+08	8.19E+06	6.82E+05	6.42E+04	2.08E+08	6.55E+03	8.52E+02	9.21E+03	4.19E+02
3406 Tennessee Val Johnsonville	47085	36.0278	-87.9861	7.63E+09	3.75E+08	1.89E+07	2.20E+07	1.16E+06	4.17E+08	5.02E+03	1.06E+03	4.85E+03	2.34E+02
3407 Tennessee Val Kingston	47145	35.8992	-84.5194	3.10E+08	1.04E+08	5.36E+06	1.86E+07	1.36E+06	9.43E+07	5.42E+03	6.33E+02	3.04E+03	1.79E+02
3470 NRG Energy W A Parish	48157	29.4828	-95.6311	1.85E+10	1.76E+08	5.16E+06	9.82E+06	9.66E+05	1.92E+08	3.19E+03	1.25E+03	4.91E+03	2.48E+02
3497 TXU GenerationBig Brown	48161	31.8206	-96.0561	8.54E+09	2.54E+08	1.45E+07	1.14E+07	7.11E+05	2.80E+08	2.80E+03	2.07E+03	4.99E+03	2.52E+02
3644 PacifiCorp-RocCarbon	49007	39.7264	-110.8639	1.35E+09	9.54E+06	2.33E+06	5.60E+05	5.85E+04	1.25E+07	1.76E+03	6.85E+02	1.78E+03	1.38E+02
3775 Appalachian PnClinch River	51167	36.9333	-82.1997	3.93E+09	1.50E+08	5.51E+06	5.26E+06	2.71E+05	1.61E+08	5.70E+03	7.50E+02	6.00E+03	2.81E+02
3776 Appalachian PGIten Lyn	51071	37.3706	-80.8672	1.64E+09	7.02E+07	3.10E+06	2.80E+06	1.70E+05	7.62E+07	5.66E+03	7.78E+02	5.40E+03	2.64E+02
3788 Mirant Corp Potomac River	51510	38.8203	-77.0411	8.82E+08	2.16E+08	2.16E+08	2.16E+08	1.89E+06	1.89E+06	1.16E+03	1.16E+03	9.91E+02	9.91E+02
3796 Dominion Virg Brems Bluff	51065	37.7089	-78.2878	1.43E+09	8.84E+07	3.33E+06	5.20E+06	2.67E+05	9.72E+07	8.11E+03	9.23E+02	6.67E+03	4.67E+02
3797 Dominion Virg Chesterfield	51041	37.3822	-77.3833	8.11E+09	6.33E+08	1.32E+07	2.76E+06	7.04E+08	8.06E+03	1.22E+03	1.23E+04	6.01E+02	6.01E+02
3803 Dominion Virg Chesapeake	51550	36.7711	-76.3019	3.75E+09	2.36E+08	7.90E+06	2.02E+07	1.06E+06	2.65E+08	7.80E+03	1.13E+03	6.88E+02	1.31E+02
3809 Dominion Virg Yorktown	51199	37.2144	-76.4611	2.05E+09	1.96E+08	4.19E+06	1.82E+07	9.01E+05	2.20E+08	8.67E+03	9.96E+02	6.27E+03	3.32E+02
3845 TransAlta EneTransalta Centra	52041	46.7625	-122.856E+06	3.12E+09	1.28E+08	3.06E+06	1.12E+07	3.37E+05	1.12E+07	3.28E+03	3.07E+02	1.79E+02	1.79E+02
3935 Appalachian PNIohn E Amos	54079	38.4731	-81.8233	1.89E+10	3.00E+07	7.15E+08	3.00E+07	3.38E+06	7.74E+08	6.37E+03	8.67E+02	6.51E+03	3.04E+02
3936 Appalachian Pkianawha River	54039	38.2056	-81.4211	2.06E+09	8.54E+07	3.23E+06	4.07E+06	2.16E+05	9.28E+07	6.65E+03	8.96E+02	7.37E+03	3.34E+02
3938 Appalachian PPhillip Sporn	54053	38.9669	-81.9231	5.13E+09	2.60E+08	7.81E+06	1.18						

Electronic Filing - Received, Clerk's Office, 07/12/2012

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6055 NRG Energy Big Cajun 2	22077	30.7261	-91.3669	1.16E+10	1.01E+08	1.10E+07	7.89E+06	4.79E+05	1.21E+08	2.40E+03	8.33E+02	2.88E+03	1.29E+02
6061 South Mississippi R Morrow	28073	31.2194	-89.3933	2.55E+09	2.66E+07	5.87E+06	6.97E+05	3.30E+04	3.32E+07	2.32E+03	8.35E+02	2.06E+03	9.41E+01
6064 Kansas City Cit Neelman Creek	20229	39.1714	-94.6958	1.47E+09	1.09E+07	1.09E+07	1.09E+07	7.11E+05	2.70E+07	2.10E+03	2.70E+02	9.53E+03	4.51E+02
6065 Kansas City Polatan	29165	39.4464	-94.9856	4.89E+09	3.01E+07	1.35E+07	1.24E+06	1.03E+05	4.95E+07	1.57E+03	1.62E+03	1.78E+02	1.97E+02
6068 Westar EnergyJeffrey Energy	20149	39.2853	-96.1086	1.51E+10	1.04E+08	4.88E+07	1.07E+07	5.41E+05	1.64E+08	1.50E+03	1.50E+03	3.30E+03	1.67E+02
6071 Louisville Gas ITrimble Count	21223	38.5847	-85.4117	3.86E+09	3.50E+07	4.55E+06	3.04E+06	1.71E+05	4.28E+07	6.68E+03	1.35E+03	7.66E+03	3.73E+02
6073 Mississippi PovVictor J Daniel	28059	30.5335	-88.5574	7.05E+09	6.54E+07	6.63E+06	1.62E+06	9.71E+04	7.38E+07	2.25E+03	6.12E+02	2.38E+03	1.05E+02
6076 PP Generatio Colstrip	30087.0	45.8836	-106.6200	1.62E+10	3.65E+07	4.37E+07	5.70E+06	3.57E+05	8.64E+07	2.35E+03	1.19E+03	2.67E+03	1.47E+02
6077 Nebraska Publ General Gentry	31111	41.0836	-101.1456	9.46E+09	4.96E+07	4.96E+07	1.03E+05	2.61E+05	7.74E+07	2.47E+03	1.16E+03	2.96E+03	1.16E+02
6082 AES NUGs AES Somerset	36063	43.3561	-78.6039	4.11E+09	1.43E+07	2.98E+06	2.88E+06	2.30E+05	2.04E+07	4.56E+03	8.94E+02	5.15E+03	2.40E+02
6085 Northern India M Schahfer	18073	41.2175	-87.0239	1.04E+10	2.53E+08	2.97E+07	1.21E+07	2.97E+05	2.96E+08	6.27E+03	1.77E+03	8.73E+03	4.25E+02
6089 MDU ResourceLewis & Clark	30083	47.9794	-104.1533	3.83E+09	2.03E+06	1.01E+06	2.34E+05	1.98E+04	3.29E+06	2.42E+03	3.00E+03	3.00E+03	1.78E+02
6090 Northern StateSherrone Co	27141.0	45.3792	-93.8958	1.36E+10	1.25E+08	3.73E+07	5.83E+06	5.90E+05	1.69E+08	5.48E+03	1.64E+03	4.66E+03	2.47E+02
6094 FirstEnergy GrBruce Mansfie	42007	40.6344	-80.4200	1.83E+10	2.17E+08	2.34E+07	2.17E+08	7.23E+05	2.56E+08	6.61E+03	1.00E+03	8.50E+03	3.51E+02
6095 Oklahoma GasSooner	40103	36.4500	-97.0531	7.13E+09	1.47E+07	1.08E+07	7.28E+05	8.41E+04	2.64E+07	1.59E+03	1.54E+03	3.42E+03	1.71E+02
6096 Omaha Public Nebraska City	31131	40.6215	-95.7765	4.62E+09	3.34E+07	1.77E+07	1.81E+06	1.11E+05	5.31E+07	1.90E+03	1.78E+03	3.89E+03	1.95E+02
6098 Otter Tail Pow Big Stone	46051	45.3047	-96.5103	2.84E+09	2.22E+07	2.32E+07	1.26E+06	6.40E+04	4.67E+07	2.09E+03	1.68E+03	3.50E+03	1.77E+02
6101 PacifiCorp-RocWyodak	56005	44.2833	-105.4000	2.67E+09	2.62E+07	4.47E+06	9.80E+05	7.01E+04	3.17E+07	3.40E+03	9.04E+02	1.83E+03	1.11E+02
6113 Duke Indiana I Gibson	18051	38.3722	-87.7661	2.24E+10	7.82E+08	4.28E+07	3.01E+07	1.56E+06	8.58E+08	5.08E+03	1.51E+03	5.40E+03	2.62E+02
6124 Georgia PowerMcintosh	13103	32.3558	-81.1683	9.25E+08	1.30E+06	1.30E+06	1.55E+06	9.04E+04	2.51E+07	6.43E+02	5.07E+03	2.37E+02	2.39E+02
6136 Texas Municp Gibbons Creek	48185	30.6167	-96.0778	3.58E+09	2.91E+07	4.16E+06	1.50E+06	1.18E+05	3.49E+07	2.48E+03	1.80E+03	4.74E+03	2.39E+02
6137 Vectren South A B Brown	18129	37.9053	-87.7150	3.51E+09	5.40E+07	9.49E+06	3.70E+06	2.40E+05	6.74E+07	5.97E+03	1.87E+03	8.82E+03	3.93E+02
6138 Southwestern Flint Creek	05007	36.2561	-94.5241	3.66E+09	4.23E+07	9.38E+06	1.18E+06	6.36E+04	5.28E+07	5.13E+03	2.03E+03	4.64E+03	2.21E+02
6139 Southwestern Welsh	48449	33.0583	-84.8458	9.52E+09	7.21E+07	2.05E+07	1.43E+07	6.99E+05	1.08E+08	2.54E+03	2.02E+03	5.42E+03	2.64E+02
6146 TXU GeneratioMartin Lake	48841	32.2597	-94.5703	1.82E+10	1.95E+08	1.75E+07	1.25E+07	6.74E+05	2.40E+08	2.55E+03	1.92E+03	4.60E+03	2.22E+02
6147 TXU GeneratioMonticello	48849	33.0917	-95.0417	1.40E+10	2.73E+07	2.73E+07	1.40E+10	2.12E+06	1.40E+08	2.47E+03	1.93E+03	4.96E+03	1.77E+02
6155 AmerenUE Ruth Island	29099	38.1306	-90.2625	8.92E+09	1.35E+08	6.88E+06	3.15E+06	2.63E+05	1.46E+08	4.77E+03	1.69E+03	5.42E+03	2.56E+02
6165 PacifiCorp-RocHunter	49015	39.1667	-111.0261	9.73E+09	1.12E+07	1.19E+07	2.56E+06	2.62E+05	2.59E+07	1.78E+03	6.52E+02	1.71E+03	1.24E+02
6166 Indiana MichigRockport	18147	37.9256	-87.0372	1.79E+10	3.59E+08	2.89E+07	5.04E+06	2.68E+05	3.93E+08	5.35E+03	1.36E+03	5.75E+03	2.81E+02
6170 We Energies Pleasant Prairi	55059	42.5381	-87.9033	8.45E+09	2.34E+08	2.43E+07	7.98E+06	4.39E+05	2.66E+08	6.93E+03	2.16E+03	1.38E+04	7.16E+02
6177 Saii River ProjCoronado	04001	34.5778	-109.2717	3.57E+09	2.12E+07	1.21E+07	1.69E+06	3.70E+05	1.60E+07	3.06E+03	3.06E+03	3.08E+03	1.79E+02
6178 ANP Coleta Creek	48175	28.7087	-97.2083	5.10E+09	4.22E+07	3.87E+06	1.18E+06	8.00E+04	4.72E+07	2.93E+03	1.00E+03	3.01E+03	1.75E+02
6179 Lower ColoradoFayette Power	48149	29.9172	-96.7506	1.10E+10	8.94E+07	7.60E+06	3.54E+06	3.87E+05	1.01E+08	3.06E+03	1.11E+03	3.13E+03	1.84E+02
6183 San Miguel EleSan Miguel	48013	28.7094	-98.4722	2.85E+09	4.56E+07	4.44E+06	4.42E+06	3.28E+05	5.49E+07	3.66E+03	1.21E+03	1.09E+04	6.01E+02
6190 Cleco Power LIRodemacher	22079	31.3950	-92.7167	3.37E+09	3.95E+07	1.01E+07	6.80E+05	5.57E+04	5.03E+07	2.80E+03	1.26E+03	2.30E+03	9.87E+01
6193 Southwestern Harrington	48375	35.2972	-101.7475	7.44E+09	3.94E+07	1.79E+07	1.35E+06	4.09E+05	5.89E+07	1.75E+03	1.31E+03	2.93E+03	1.69E+02
6194 Southwestern Tolk	34.1847	-102.5686	7.41E+09	1.82E+07	1.82E+07	1.40E+06	1.40E+06	9.28E+04	2.04E+07	1.88E+03	1.24E+03	2.97E+03	1.71E+02
6195 Springfield CitySouthwest	29077	37.1519	-93.3892	1.27E+09	5.75E+06	1.80E+07	6.72E+05	6.71E+04	2.44E+07	5.59E+03	2.16E+03	6.54E+03	2.95E+02
6204 Basin Electric IBasin Electric	156031	42.1103	-104.8828	4.35E+09	4.59E+07	2.72E+07	7.07E+06	5.25E+05	8.07E+07	3.50E+03	1.37E+03	3.23E+03	2.11E+02
6213 Hoesier EnergiMerom	18153	39.0694	-87.5108	6.77E+09	1.12E+08	1.68E+07	5.70E+06	4.53E+05	1.35E+08	5.38E+03	1.67E+03	6.11E+03	2.98E+02
6238 Soyland PowerPearl Station	17149	39.6200	-90.9000	1.74E+08	1.21E+07	3.36E+06	6.02E+02	1.08E+03	1.55E+07	7.12E+03	2.75E+03	1.00E+04	4.67E+02
6248 Public Service Pawnee	90087	40.2217	-103.6803	2.93E+09	2.33E+07	5.20E+06	1.10E+06	1.18E+05	3.47E+07	5.21E+03	1.64E+03	3.85E+03	1.88E+02
6249 South CarolinaWinayk	45043	33.3303	-79.3611	7.84E+09	1.73E+08	4.84E+06	1.82E+07	1.02E+06	1.96E+08	4.38E+03	6.65E+02	4.85E+03	2.23E+02
6250 Progress EnergiMayo	37145	36.5278	-78.8917	4.94E+09	1.68E+08	4.85E+06	3.17E+06	3.47E+05	1.76E+08	6.11E+03	8.28E+02	6.67E+03	3.16E+02
6254 Interstate PowOttumwa	19179	41.0961	-92.5556	3.23E+09	6.24E+07	1.22E+07	6.48E+06	3.45E+05	8.15E+07	5.21E+03	1.88E+03	5.03E+03	2.45E+02
6257 Georgia PowerScherm	13207	33.0583	-83.8072	2.41E+10	3.58E+08	1.32E+07	1.44E+07	7.77E+05	3.87E+08	4.32E+03	7.23E+02	4.61E+03	2.20E+02
6264 Appalachian PIMountaineer	54053	38.9794	-81.9244	1.05E+10	2.83E+08	1.11E+07	1.01E+07	5.14E+05	3.04E+08	6.99E+03	8.72E+02	6.93E+03	3.20E+02
6469 Basin Electric IAntelope Valley	38057	47.3714	-101.8348	6.89E+09	1.21E+07	1.67E+07	6.89E+06	1.67E+06	9.03E+07	3.15E+03	1.88E+03	3.12E+03	1.27E+02
6483 Los Angeles CitIntermountain	49027	39.5108	-112.5792	1.37E+10	6.46E+06	1.61E+07	2.76E+06	2.13E+05	2.54E+07	1.80E+03	6.39E+02	1.75E+03	1.27E+02
6639 Western Kent R D Green	21233	37.6467	-87.5006	2.10E+09	1.28E+07	9.52E+06	2.84E+06	1.56E+05	2.54E+07	5.64E+03	1.67E+03	6.75E+03	3.26E+02
6641 Entergy ArkanIndependence	05063	35.6733	-91.4083	1.00E+10	1.05E+08	1.88E+07	2.87E+06	1.47E+05	1.27E+08	4.69E+03	1.43E+03	4.19E+03	1.99E+02
6648 TXU GeneratioSandow No 4	48331	30.5642	-97.0639	3.30E+09	8.47E+07	1.20E+07	8.44E+06	4.71E+05	1.06E+08	3.26E+03	2.51E+03	6.94E+03	3.60E+02
6664 MidAmerican Ilocous	91115	41.3153	-91.0936	1.79E+09	6.72E+07	1.10E+06	1.10E+06	6.37E+05	2.26E+08	5.45E+03	2.80E+07	5.29E+03	1.72E+02
6705 Alcoa US Warrick	18173	37.9089	-87.3322	4.39E+09	4.85E+08	1.79E+07	4.83E+07	2.72E+06	5.53E+08	5.84E+03	1.64E+03	7.89E+03	3.66E+02
6761 Platte River PolRawhide	08069	40.8611	-105.0206	1.92E+09	2.08E+06	5.40E+06	8.90E+05	6.44E+06	8.44E+06	2.37E+03	1.45E+03	3.34E+03	2.38E+02
6768 Sikeston City Sikeston Power	29201	36.8786	-89.6169	1.98E+09	4.37E+07	6.82E+06	9.40E+05	1.06E+05	5.16E+07	5.78E+03	2.54E+03	7.51E+03	3.72E+02
6772 Western Farm Hugo	40023	34.0158	-95.3206	3.02E+09	1.26E+07	4.06E+06	1.29E+05	1.68E+07	1.68E+07	2.44E+03	2.00E+03	4.40E+03	2.16E+02
6823 Western Kent B D Wilson	21183	37.4497	-87.0803	1.81E+09	6.62E+07	8.70E+06	2.43E+06	1.24E+05	7.75E+07	6.02E+03	1.37E+03	7.69E+03	3.90E+02
7030 PNM Altura Twin Oaks Power	48395	31.0978	-96.6922	4.47E+07	4.47E+07	4.08E+06	1.08E+06	9.28E+04	2.04E+07	2.40E+03	1.47E+03	1.94E+03	1.94E+02
7097 CPS Energy J K Spruce	48029	29.3064	-98.3203	4.18E+09	1.56E+07	1.50E+07	1.98E+06	1.08E+06	1.14E+08	3.76E+03	1.73E+03	1.13E+04	6.17E+02
7210 South CarolinaCope	45075	33.3642	-81.0300	2.99E+09	1.25E+07	1.37E+06	6.66E+04	1.74E+07	5.45E+05	8.09E+02	5.95E+03	2.79E+02	1.77E+02
7343 MidAmerican IGeorge Neal S	19193	42.3022	-96.3622	3.95E+09	1.22E+07	1.22E+07	1.21E+06	6.81E+04	3.80E+07	1.73E+03	1.80E+03	3.44E+03	2.79E+02
7504 Black Hills PowNeil Simpson	156005	44.2853	-105.3841	6.48E+08	1.69E+06	5.68E+05	5.25E+05	5.57E+04	2.84E+06	3.40E+03	9.04E+02	1.83E+03	1.11E+02
7537 Dominion Virg North Branch	54023	39.2633	-79.3303	6.93E+09	1.98E+08	1.39E+07	3.75E+06	1.19E+06	3.75E+07	5.00E+03	6.51E+03	8.77E+03	6.62E+02
7970 Deseret GeneraBonanza	49047	40.0864	-109.2844	3.05E+06	7.76E+06	3.71E+07	1.31E+06	1.07E+05	1.22E+07	2.48E+03	2.05E+03	2.43E+03	1.64E+02
7902 Southwestern Pirkey	48203	32.4607	-94.4852	4.99E+09	2.90E+07	8.82E+06	5.32E+06	3.10E+05	4.34E+07	2.48E+03	1.83E+03	4.59E+03	2.20E+02
8023 Wisconsin PowColumbia	55021	43.4864	-89.4203	6.69E+09	1.51E+08	1.02E+07	3.						

CERTIFICATE OF SERVICE

I, Andrew Armstrong, hereby certify that I have filed the attached **PUBLIC COMMENT** on behalf of the Environmental Law & Policy Center, Natural Resources Defense Council, Sierra Club, and the Respiratory Health Association in PCB 12-135 upon the attached service list by depositing said documents in the United States Mail, postage prepaid, in Chicago, Illinois on July 12, 2012.

Respectfully submitted,



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SERVICE LIST

July 12, 2012

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