Jackson, Tricia

From: Amy Farrell <FarrellA@api.org>
Sent: Friday, February 19, 2016 4:53 PM
To: 111d
Cc: Jackson, Tricia
Subject: RE: Clean Power Plan Stay: Next Steps

Dear Tricia -
Thank you for the opportunity to provide input. We understand the stay of the CPP may influence the structure of the stakeholder process but we do believe there is still benefit in discussing the options for clean, affordable and reliable power in Arkansas. As you know, API (formerly ANGA) has been working with ICF to model costs and emissions associated with different compliance pathways under EPA's Clean Power Plan. The model solves for a lowest-cost resource mix and sensitivity analyses we've run provide useful insights into the costs of policy tools and the impacts of assumptions. We will be providing a written report in the coming weeks and welcome the opportunity to present our work in whatever forum might be appropriate. We stand ready to be a resource for the APSC and the ADEQ in whatever process moves forward.

Thank you,
Amy Farrell

Amy Farrell
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-----Original Message-----
From: Jackson, Tricia [mailto:jacksonp@adeq.state.ar.us]
Sent: Friday, February 12, 2016 7:01 PM
To: Amy Farrell; reminger@americaspower.org; ken@klsmithconsulting.com; jamie.ewing@arkansasag.gov; william.mason@arkansas.gov; tschroedter@hallestill.com; msimpson@arkansasedc.com; cmiller@environmentark.org; krobbins@aipro.org; jcritcher@arml.org; annaw@arpanel.org; khall@arkansasstatechamber.com; ross@mcmathlaw.com; brent@brentstevensonassociates.com; walter.bryant@centerpointenergy.com; george.heintzen@conwaycorp.com; scain@aecc.com; cbarlow@entergy.com; callen@misoenergy.org; jcarter@nlr.ar.gov; mallison@ddh-AR.com; turnerum@oge.com; gcook@ppmsllc.com; glen.hooks@sierraclub.org; dboyd@misoenergy.org; lnickell@spp.org; vmccellon-allen@aep.com; fiji.george@swn.com; Bill Paschall; Donald Erbach; sarah.tacker@arkansasag.gov; dara.hall@arkansasag.gov; steve.cousins@lionoil.com; bkincaid@audubon.org; dscheiman@audubon.org; gmoody@audubon.org; michael.chapman@conwaycorp.com; CWarner@aecc.com; kmcque1@entergy.com; callen@misoenergy.org; thillman@misoenergy.org
Cc: Keogh, Becky; Spencer, Stuart; Chapman, Julie; Cain, Timothy; Harrelson, Tammy; Davis, Anthony; Tori.Gordon@governor.arkansas.gov; EMoore@psc.state.ar.us; tthomas@psc.state.ar.us
Subject: Clean Power Plan Stay: Next Steps

Stakeholders,

The Arkansas Department of Environmental Quality and Arkansas Public Service Commission are pleased to have high-Court relief from the challenging federally mandated timeline with respect to the Clean Power Plan. Our agencies will continue, as we did before the CPP was issued, to engage our stakeholders on proposed and ongoing energy and environmental policy and regulation. We look forward to engagement that can now occur on a timeline and in a context that makes sense and represents good stewardship of taxpayer resources for Arkansas, for our citizens, and for our regulated community.

Our agencies are considering the following questions as we assess the most appropriate direction for Arkansas:

1) Will EPA continue to seek comment on related issues that were not finalized in the rule that are subject to the stay? (e.g. the Clean Energy Incentive Program)
2) If the Clean Power Plan is ultimately upheld, how will the new compliance schedule develop?
3) Will modeling entities continue to optimize modeling and find agreement on modeling assumptions during the stay?
4) How do we, in our respective agencies, maximize the value of the resources already invested by the Agencies and stakeholders with respect to this rule and energy and environmental policy?
5) What is our obligation under Act 382 of 2015 (Ark. Code Ann. 8-3-203(b)(2))? Is the State required to suspend activity during the stay?
6) How does the stay impact the obligation of the Arkansas Public Service Commission to provide a cost estimate for the Arkansas Clean Power Plan strategy?
7) How will the stakeholder group function during the stay, and are there benefits that may be derived from discussing energy and environmental policy implicated by other EPA rules?

Our agencies are contemplating the questions above and are particularly interested in your thoughts on questions 4 - 7. Please provide your timely feedback to the following email address: 111d@adeq.state.ar.us. We will consider your feedback as we look forward.