August 6, 2014

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Extension of the 111(d) Existing Source Proposal Comment Deadline

Dear Administrator McCarthy:

On behalf of the Edison Electric Institute (EEI) and its member companies, let me express our sincere thanks to you and your team for a continued willingness to engage with states, our industry and other stakeholders regarding the proposed 111(d) existing source guidelines. This dialogue should enable a thorough and detailed analysis of both the proposal and the extensive supporting documentation, and is a critical element in our ability to provide constructive comments. In turn, we believe this input will assist EPA’s development of improved final guidelines, while allowing us to continue to provide reliable and affordable power to our customers.

EPA has provided for a 120-day comment period, with comments currently due on October 16. There has been tremendous progress made so far by states, the electric sector and others in developing the basis for meaningful and constructive comments. However, due to the extraordinary scope and complexity of the proposal, EEI respectfully requests a modest extension of the public comment period.

We are mindful of the overall calendar for this rulemaking and understand fully the need to develop final guidelines in a timely manner, yet it is vitally important that the Agency creates a strong factual record in support of the final guidelines. Given the time-intensive challenges associated with creating a framework that facilitates both state-specific and regional approaches to compliance, constructive comments from the electric sector and other stakeholders—especially states—will be critical in the development of this record. In summary, a short extension would serve multiple interests.

Thank you again for the proactive efforts of you and your team. EEI and its members look forward to continuing to work with you on these issues.

Sincerely,

Thomas R. Kuhn