And one more comment:
- There is insufficient explanation of why we should apply a $30 reduction to the cost of RE in the IPM modeling -- an extra couple of sentences explaining the rationale for this critical base concept would help a lot. Why the $30, and how does this input into the model runs?

To add to the comments you received earlier:

- Can EPA take comment on limiting RE targets somewhere geared to avoid reliability issues? If EPA does move to an approach that limits RE targets in a way that considers grid constraints (with some room for grid build-out/improvements over the next decade+), the stringency of this will come down. That could be accommodated for in several ways—e.g., looking at just the top top states when calculating the benchmark, or applying a growth factor to the benchmark, or by using $35 or $40 in the IPM model instead of $30.

- Second, a few states have RE targets that are below what they achieved in 2012. Can EPA take comment on locking in 2012 RE (or, ideally, 2013 or 2014 RE) if the model generates RE that is below? This would be another means to accommodate limits on the higher end to deal with reliability issues. And it would be consistent with EPA’s approach to existing and under-construction nuclear.