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Vice President – Environmental

September 5, 2014

Submitted Electronically

Angela Dickens
Wisconsin Department of Natural Resources

Delanie Breuer
Public Service Commission of Wisconsin

RE: Comments on U.S.EPA's Proposed "Carbon Pollution Emission Guidelines for Existing Stationary Sources and Standards for Modified and Reconstructed Stationary Sources: Electric Generating Units"; EPA-HQ-OAR-2013-0602 and EPA-HQ-OAR-2013-0603 (79 Fed. Reg. 34830 (June 18, 2014))

Dear Ms. Dickens and Ms. Breuer:

Wisconsin Electric Power Company, doing business as We Energies, appreciates the outreach that the Wisconsin Department of Natural Resources and the Public Service Commission of Wisconsin are conducting regarding U.S.EPA's proposed CO₂ regulations applicable to electric generating units, a.k.a. U.S.EPA's proposed "Clean Power Plan". The company is responding to the state agencies' request for early input on issues that have been identified of particular interest to the state. We understand that the state plans to submit comments to U.S.EPA as part of the public comment period that is scheduled to close October 16, 2014. We Energies also plans to submit comments to U.S.EPA.

There are significant legal questions regarding the proposed rule. Among them is the scope of EPA's proposed best system of emission reduction, as encompassed by the proposed four building blocks. EPA is likely on the strongest legal ground with building block 1, "inside the fence" portion of the proposed rule dealing with improving power plant efficiency. Building blocks 2, 3, and 4, the "outside the fence" portions of the rule dealing with environmental dispatch, renewable and nuclear energy, and demand side energy efficiency, respectively, are likely to face considerable legal scrutiny once the proposed rule becomes final.

We Energies participated in joint utility discussions and analysis of potential rule impacts, and supports the comments that the joint utilities have submitted. We are also providing an individual company response to the agencies' invitation for input. Our specific responses to the agencies questions are attached.

We are also attaching a short document that outlines the company's key areas of interest that includes a high level estimate range for the potential statewide utility costs associated with implementing the proposed rule.

U.S.EPA's proposed rule likely will lead to significant changes in electricity generation in the state, and nationwide. Major areas of uncertainty include impacts on state, regional and national electricity transmission and natural gas infrastructure, as well as major shifts in the dispatch of electricity generation. Each of these uncertainties is likely to result in increased costs for our customers, and there are many critical aspects of rule implementation that remain unclear. We therefore encourage and support the state's involvement in this important national energy policy proposal.

We look forward to continuing to work together with you. If you should have any questions or require further information regarding these comments, please contact Kris McKinney, Manager Environmental Strategy, by telephone at 414-221-2157, or by e-mail at kris.mckinney@we-energies.com.

Sincerely,



Bruce W. Ramme
Vice President Environmental

Attachments

WDNR and PSCW Questions on EPA's Clean Power Plan Proposal
We Energies Responses
September 5, 2014

I. OVERARCHING ISSUES.

- a. **Electrical Reliability.** What factors or analyses need to be considered to evaluate impacts of this rule on electric reliability? Does the use of emissions averaging periods adequately ensure electrical reliability? Could other mechanisms help with this issue (e.g. MACT-type extensions, fail-safe/off ramp for emergencies, etc.)?

Response: A mechanism is needed to provide state flexibility for treatment of units that are designated for retirement but are required to run due electric system reliability constraints. The flexibility needed would be determined based on whether the state 111(d) plan is mass-based or rate-based. It appears reasonable to incorporate state flexibility for treatment of these units since, once the system reliability issues are resolved, these units will not be a source of future CO₂ emissions. The need for this type of flexibility could be demonstrated by unit System Support Resource (SSR) status, or through some other similar type of electric system operator procedure. These units should be considered as a reduction in CO₂ emissions if retirement is planned/announced when the unit is not allowed to retire for reliability reasons, and then also consider the unit as an immediate reduction for both rate based and mass based approaches since it will retire as soon as the system reliability issue is addressed.

Please also see the Wisconsin Utilities Joint Response.

- b. **Stranded Costs.** How does the proposed rule impact previous investments in emission controls, including type and magnitude of impact? Does the proposed rule include options to avoid stranded costs? If not, what could EPA change to address this? Is a certain level of stranded costs acceptable, and if so, what level?

Response: We Energies has invested more than \$1.1 billion in air quality control systems (AQCS) at existing coal power plants since 2003. Other Wisconsin utilities are expected to invest about \$2 billion in AQCS at existing coal power plants. EPA's Integrated Planning Model (IPM) output suggests in its 2025 policy case that one unit of the Pleasant Prairie Power Plant would retire. Retirement of that unit by 2025 would result in about \$200 to \$225 million in stranded costs. Other Wisconsin coal power plants are also suggested for retirement, or drastically reduced utilization, by IPM output in EPA's 2025 policy case. The rule needs to provide a means to address such stranded costs. One possible approach would be to allow the units to run for the balance of their useful lives to avoid the stranded cost, with a commitment for a no-later-than future retirement date, and grant credit for an immediate rate based or mass based reduction upon making such a retirement commitment. The CO₂ reduction is delayed but guaranteed, and the investment is preserved.

- c. **System- versus unit-based approach.** Please comment on the EPA's consideration of the electrical system as a whole in setting BSER (best system of emission reduction), and the EPA's interpretation of what is an 'adequately demonstrated' BSER. Would an 'inside the fence line' approach be more appropriate for goal setting and/or compliance? Why or why not? Please discuss any related legal concerns.

Response: The proposed guidelines are inconsistent with Section 111's narrow and exclusive focus on stationary sources. A New Source Performance Standard (NSPS) or existing source guideline must apply to individual sources, must be based on reductions that an individual source can achieve, and must be based on use of a system that is incorporated into the design of the source itself. EPA's BSER determination incorrectly looks outside the fence line of individual regulated sources in Building Blocks 2-4. The plain language of section 111(d) limits BSER to on-site controls, activities, or work practices. Every NSPS and every existing source guideline EPA has promulgated has been based on measures that the regulated source can incorporate into its design or otherwise implement by itself. With an "inside the fence" approach, power plants are equipped to measure and certify CO2 reductions from changes made. On the other hand "outside the fence" reductions are based more on assumptions and calculations and are much more difficult to quantify.

II. SETTING STATE GOALS.

- a. **Baseline.** EPA set the BSER requirements based on a 2012 baseline.
- i. Does this baseline adequately credit, or conversely penalize, states and utilities for early action? If the latter, would a different year or type of baseline be more appropriate (e.g., use of the 3 highest of 5 years as used under CSAPR), and if so, why?
Response: Please see the Wisconsin Utilities Joint Response.
 - ii. Please comment on EPA's legal argument that they must use 2012 as a baseline.
Response: Please see Wisconsin Utilities Joint Response.
 - iii. Does 2012 represent normal operating conditions?
Response: Please see Wisconsin Utilities Joint Response.
 - iv. Please provide your estimate of the amount of reduction due to actions between 2005 and 2012 that have not been included in the goal setting for our state, and the cost of those measures since 2005.
Response: We Energies 2012 CO2 emissions of about 19.7 million tons were about 3.8 million tons lower than 2005 CO2 emissions of about 23.5 million tons. There are a variety of reasons for these reductions, including lower natural gas prices in 2012 that led to combined and simple cycle natural gas power plants running at higher capacity factors than they did before then or since. Other actions during

this time period, which Wisconsin did not receive credit for in the way EPA calculated Wisconsin's interim and final goals, also explain the drop in CO2 emissions, including:

- *Repowering about 320 MW of coal retired in 2002 and 2004 to 1,150 MW of natural gas combined cycle in 2005 and 2008 at a cost of \$664 million;*
- *Adding the two largest wind projects in Wisconsin: 145 MW Blue Sky Green Field in 2008 at a cost of about \$300 million and 162 MW Glacier Hills Wind Park in 2011 at a cost of about \$364 million.*

- b. **Building Blocks.** Is the building block approach to setting state goals appropriate? Do you favor an alternative approach? Should states be allowed to propose alternative building blocks based on technical and economic feasibility when preparing a plan? Did EPA use the best data for Wisconsin power plants and power sector (renewable energy and energy efficiency) programs? For each of the building blocks below, please discuss any alternative approaches EPA could take.

Response: Please see the Wisconsin Utilities Joint Response.

- i. **Building Block 1: Heat Rate Improvements.** This block calls for an overall 6% improvement in the heat rate of coal units.
1. Can Wisconsin's coal plants achieve a 4% improvement in heat rate on average through best practices? Can they achieve 2% improvement through equipment upgrades? If not, by how much could WI coal plants improve their heat rate?

Response: Please see the Wisconsin Utilities Joint Response.

2. What costs and timeframes would be needed to implement these heat rate improvements?

Response: Potential costs to achieve EPA's proposed level of heat rate improvement, if even technically feasible, are in the range of \$25 to \$75 million per year. A policy based on a 1 or 2% heat rate improvement is more realistic than the proposed 6%. EPA should phase in any heat rate improvement requirement over the interim goal 2020 to 2029 time period, as EPA proposed for building blocks 3 and 4 to allow for a more sensible schedule for design, approval, and construction of heat approval changes.

3. Should the goal be based on what is achievable on average across the nation or be more focused regionally or within a state?

Response: Please see the Wisconsin Utilities Joint Response.

4. Does EPA adequately consider possible interactions with Building Block 2 (increased dispatch of NGCC units) in determining what is achievable for heat rate improvements? For example, could decreased reliance on coal

offset any benefit of efficiency upgrades because of reduced heat rate when a unit is run less or cycled more often, and by how much?

Response: Please see the Wisconsin Utilities Joint Response.

5. In calculating the goals, EPA assumes power plants can achieve all of the heat rate improvements by 2020. Is this feasible for Wisconsin units, or should EPA assume units can accomplish these improvements over a longer time period (e.g. by 2030)?

Response: Please see the Wisconsin Utilities Joint Response.

6. For utilities: please identify any heat rate improvements made since 2005 and provide specific cost and percentage change in heat rate for each unit.

Response: Well run utilities generally maintain power plants to retain efficiency. Numerous routine maintenance projects occur every year as a means of retaining power plant efficiency. Larger, less frequent maintenance projects must be evaluated with respect to prevention of significant deterioration (PSD) and new source review (NSR) permitting requirements, which may trigger more stringent control requirements unrelated to the proposed maintenance project.

7. For utilities: identify any heat rate changes from emission control projects and provide specific cost and percentage change in heat rate for each unit. Discuss whether these changes are considered in the baseline.

Response: Power plants that add air quality control systems (AQCS) after the 2012 baseline year will be penalized by building block 1 goals because of EPA's proposed use of net versus gross generation. Addition of AQCS will increase the plant's auxiliary load and degrade its net heat rate.

ii. **Building Block 2: Increased Dispatch of NGCC Units.**

1. Can the state's NGCC units operate at 70% capacity on a permanent basis? What are the equipment impacts and O&M costs of operating at 70%? What are the impacts on the electric system? Will decreasing the ability to quickly ramp up/down adversely affect intermittent renewables on the system?

Response: Please see the Wisconsin Utilities Joint Response.

2. Is this building block likely to create electrical reliability issues if NGCC capacity isn't available for increased dispatch upon demand? Would operating NGCC units at 70% capacity affect utilities ability to maintain the required 15% reserve capacity for reliability purposes?

Response: Please see the Wisconsin Utilities Joint Response.

3. Was EPA's determination that existing natural gas infrastructure could support such an expansion adequate? If not, how much additional capacity

is needed and is firm gas available? Please comment on natural gas storage and hedging impacts.

Response: *Please see the Wisconsin Utilities Joint Response.*

4. EPA suggests that states could drive these changes in dispatch via either economic mechanisms (e.g., a carbon price on electricity generation) or via emissions limits in permits. Which mechanism do you think would be most effective? What are the strengths and weaknesses of each mechanism?

Response: *Please see the Wisconsin Utilities Joint Response.*

5. In calculating the goals, EPA assumes power plants can increase NGCC dispatch to 70% by 2020. Can Wisconsin units fully ramp up dispatch by 2020, or should EPA allow units to shift dispatch over a longer time period?

Response: *Please see the Wisconsin Utilities Joint Response.*

Other Building Block 2 Consideration:

- **Response:** *Please see the Wisconsin Utilities Joint Response.*

iii. Building Block 3a: Dispatch of At-Risk Nuclear Capacity.

1. Is it appropriate and meaningful for EPA to count 5.8% of Point Beach's generation as "at risk"? Is this methodology reasonable, and if not, is there another approach you would propose to consider nuclear facilities? How would this approach impact a non-regulated, merchant-owned plant like Kewaunee?

Response: *Please see the Wisconsin Utilities Joint Response.*

2. How does this effort to keep "at-risk" nuclear plants open interact with licensing requirements which may require the plants to close at a certain date? For example, Point Beach's units are licensed through 2030 and 2033.

Response: *Please see the Wisconsin Utilities Joint Response.*

3. Should EPA include other existing nuclear generation (e.g., the remaining 94.2% of Point Beach's generation) in setting the goal? If so, how?

Response: *Please see the Wisconsin Utilities Joint Response.*

iv. Building Block 3b: Increased Generation of Renewable Energy.

1. Is it possible for Wisconsin to expand renewable generation to 11% of total generation with only in-state resources, and if so, what is the estimated cost of doing so? Is this achievable using a combination of in-state and out-of-state renewable energy purchases (which EPA intends to allow), and what are the likely costs of complying? How close are utilities to reaching the 11% goal if the requirement was for in-state resources?

Response: *Please see the Wisconsin Utilities Joint Response.*

2. Is it appropriate for EPA to exclude out-of-state renewables in setting a state's goal? If it is not appropriate, can you suggest a mechanism by which EPA could account for the many different contracts for renewable electricity purchases across state lines?

Response: Please see the Wisconsin Utilities Joint Response.

3. Is it appropriate for EPA to determine the target and growth rate on a regional basis? Are there other ways (state-specific, nationally, based on technical renewable generation potentials) that would be better?

Response: Please see the Wisconsin Utilities Joint Response.

4. Is the use of state Renewable Portfolio Standard targets appropriate for a regional goal?

Response: The Please see the Wisconsin Utilities Joint Response.

5. Is it appropriate for EPA to apply a growth rate that is a percent of existing capacity?

Response: Please see the Wisconsin Utilities Joint Response.

6. EPA describes an alternative renewable energy approach based on technical and market potential for renewable energy within different states. Do you believe this is a better approach? Do you agree with how they calculated renewable energy potentials? Please discuss why or why not. What would this mean for Wisconsin, specifically? Would an approach that is based on potential within in a state rather than RPS goals consider current or future out-of-state obligations?

Response: Please see the Wisconsin Utilities Joint Response.

v. **Building Block 4: Increased Energy Efficiency.**

Response: Information from the Public Service Commission of Wisconsin estimates that the cost to achieve EPA's energy efficiency goals would be about \$60 to \$65 million per year from 2020 on. These costs are in addition to the costs ratepayers currently are paying to Focus on Energy.

1. Is it achievable for Wisconsin to sustain 1.5% incremental savings per year through 2030 and beyond? If so, should it be done through the Focus on Energy program or via some other means? If 1.5% incremental savings is not achievable, is there a different target that would be more appropriate?

Response: Please see the Wisconsin Utilities Joint Response.

2. Is the growth rate of 0.2% of sales per year appropriate? If not, what is the appropriate growth rate?

Response: Please see the Wisconsin Utilities Joint Response.

3. Is EPA's choice of measure lifetime (used to define the duration of energy savings) for the goal appropriate?

Response: Please see the Wisconsin Utilities Joint Response.

c. Alternative Approaches Discussed by EPA.

Response: Due to time constraints imposed by rule schedule and complexity, all analysis to date has been focused on the proposed approaches, not the alternatives.

- i. EPA presents alternate targets for each building block that are less stringent and have shorter compliance periods. Please comment on each of these targets and whether you believe they are more or less appropriate than those proposed by EPA.

Response: Please see the Wisconsin Utilities Joint Response.

- ii. EPA also discusses a different approach to setting the goals based on Building Block 1 (heat rate improvements) coupled with reduced utilization of fossil EGUs. Do you believe this is a better approach? Please discuss why or why not.

Response: Please see the Wisconsin Utilities Joint Response.

III. COMPLIANCE WITH THE RULE.

- a. **Compliance Flexibility.** Do you have any concerns with the compliance flexibility proposed in the rule? Are there other flexibilities that should be considered (e.g. use of CHP, non-electric energy efficiency, etc.)? If EPA allowed too much flexibility, how could they narrow the scope of what is allowed for compliance?

Response: Please see the Wisconsin Utilities Joint Response.

- b. **Responsible Parties.** EPA says this rule should allow states to comply via either an emission limit approach (in which limits are applied to units which may or may not be able to purchase and trade credits) or a portfolio approach (which may combine emission limits with other enforceable measures and may be utility-driven or state-driven). Does anything in the rule as written preclude the use of any of these approaches? Which parties (utilities, states, etc.) should bear the obligation for the different aspects of compliance?

Response: Please see the Wisconsin Utilities Joint Response.

- c. **Rate and mass based standards.**

- i. Does the rule structure adequately allow for use of either a rate or mass based standard? If not, how could the rule be modified to do so?

Response: This question is difficult to answer without further clarification from EPA regarding conversion of a rate to a mass based standard. Without further clarification, a rate based approach may be preferred in order to accommodate weather effects on system output, allow for increased customer power demand, and account for future electro-technology improvements (e.g., electric vehicles). Please also see the Wisconsin Utilities Joint Response.

- ii. EPA does not prescribe a methodology for determining mass based limits. What factors should be considered in establishing a mass cap?
Response: Please see the Wisconsin Utilities Joint Response.
 - iii. EPA presumes that states may establish mass caps when developing a plan. Should these values be fixed or be adjustable going into the future?
Response: Please see the Wisconsin Utilities Joint Response.
 - iv. Should EPA determine mass caps for each state? Should states be required to use EPA's determined limit or allowed to calculate their own mass cap (subject to EPA approval)?
Response: Please see the Wisconsin Utilities Joint Response.
 - v. Would it be appropriate and feasible for Wisconsin utilities to adopt different approaches such that one utility could comply with a mass-based standard while another meets rate based goal?
Response: Please see the Wisconsin Utilities Joint Response.
- d. **Use of new facilities for compliance.** EPA states that it intends to allow new units (such as new NGCC plants) to count towards compliance with the existing source rule. Do you see any potential issues with regulating these plants under both 111(b) and 111(d)?
Response: Please see the Wisconsin Utilities Joint Response.
- e. **Expansion of renewables.** For utilities: how much additional renewable generation and what type do you anticipate using to comply with this rule? Are you likely to build this capacity in state or out-of-state? Please provide any costs estimates, if you have them, for this additional capacity, whether it is generation or transmission costs.
Response: We Energies estimated cost to meet the renewable energy goals of this building block range from \$15 to \$30 million per year in 2020 and increase to \$150 to \$300 million per year in 2030. These costs assume the current production tax credit is extended and are in addition to what Wisconsin ratepayers will pay to meet the state's renewable portfolio standard. The costs also assume that all incremental renewable requirements would be satisfied by building new wind resources in Wisconsin. By 2030 this would amount to needing another 7 to 8 wind projects that are on the scale of We Energies Blue Sky Green Field wind project. Use of out-of-state renewable resources is likely to be more feasible on a going forward basis than a historical basis since EPA has already set up baselines and target calculations assuming all renewable generation in each state is part of those calculations, regardless of REC ownership. Future renewable energy projects are not encumbered by such an assumption.
- f. **Interstate effects - RE.** EPA states that renewable electricity purchased from out-of-state could count towards compliance if the states ensure that this electricity will not be double counted. Is this appropriate? Can you suggest any way to structure the program to ensure that such electricity is not double-counted?

Response: Please see the Wisconsin Utilities Joint Response.

- g. **Interstate effects – EE.** EPA proposed to scale down energy efficiency savings for states that are net importers of electricity and took comment on whether they should scale up EE savings for net exporter states to account for the cross-border savings from in-state programs. Are these each appropriate approaches? Is there a better way to handle this issue?

Response: Please see the Wisconsin Utilities Joint Response.

h. **Trading program.**

- i. EPA allows states or regions to create plans based on emissions averaging and trading. Is this appropriate?

Response: Please see the Wisconsin Utilities Joint Response.

- ii. Should EPA provide a default national trading program that states or sources can opt into for compliance purposes?

Response: Please see the Wisconsin Utilities Joint Response.

- iii. Are there types of credits or trading programs that may be barred from the rule as proposed?

Response: Based on our current understanding of the proposed rule, it is not clear that there would be any types of credits or trading programs that would be barred from the rule as proposed. A program that minimizes the need for states to complete complicated and time consuming interstate compacts or memoranda of understanding would be desirable. If a state has an approved plan, and ends up creating or needing emission (tons) or generation (MWh) credits, that surplus or deficit of credits should be allowed for compliance purposes either within that state or by trading with any other state that has an approved plan. EPA, which has this experience and has served this function with other trading programs, or some other entity should set up a credit accounting system to facilitate a trading system on as wide a geographic scale (i.e., national) as possible, and as simply as possible from an administration standpoint.

Please also see the Wisconsin Utilities Joint Response.

- iv. Would it be appropriate to have separate systems for trading pounds of CO₂ and avoided megawatt-hours of generation?

Response: Please see the Wisconsin Utilities Joint Response.

- v. Should a trading program be state-wide, region-wide, or nation-wide?

Response: Please see the Wisconsin Utilities Joint Response.

- vi. Who should manage emission trading systems?

Response: Please see the Wisconsin Utilities Joint Response..

- i. **Displacement of generation/emissions.** EPA does not specify a methodology for states to use in determining what kind of generation (and how large its associated CO₂ emissions) would be displaced by renewable electricity and energy efficiency measures. What would be the best way to determine this?

Response: Please see the Wisconsin Utilities Joint Response.

- j. **Federal enforceability of compliance measures.** If a program is explicitly used as a compliance measure under this program, EPA has stated that that program must become federally enforceable. Do you foresee any issues with having existing state programs (such as the RPS and Focus on Energy) become federally enforceable?

Response: Yes. First, EPA's stance on this could be considered to be circular – for a state plan to be approvable it has to include federally enforceable emission limits. Second, if a state plan were approved by EPA, and federally enforceable, it is not clear whom citizens then sue under the citizen suit provision. Finally, if a state does not submit an approvable plan, EPA has may have no authority to promulgate a federal plan that includes the measures it would require of states, e.g. EPA may not be able to adopt a plan that imposes a federally enforceable energy resource development program on states, EPA may not be able to require reduced operations from affected EGUs in a federal plan, and courts have held that the obligations EPA imposes under a section 110 FIP may be limited to emission sources alone (see New York v. EPA, cases rejecting vehicle inspection/maintenance requirements). In addition, EPA's authority to establish and enforce state energy programs may be fundamentally inconsistent with the Federal Power Act's (FPA) division of regulatory authority over the electric utility industry between the federal government and the states.

- k. **Regional approaches to compliance.** Do you have any thoughts on whether Wisconsin should participate in a regional compliance approach? What type of regional approach would be most appropriate? Which other states would you like to see as partners?

Response: Please see the Wisconsin Utilities Joint Response.

- l. **Treatment of biomass.** EPA stated that they assume states will use biomass for compliance with the regulation, but also referred to their not-yet-released biomass accounting framework when discussing how biomass would be treated under this rule. How should biomass be treated? Should different types of biomass-based generation be treated differently? For example, should ag digesters receive credit for methane reduction as well as for displacing carbon emitting generation?

Response: Please see the Wisconsin Utilities Joint Response.

IV. OTHER TOPICS.

- a. **Potential to trigger New Source Review requirements.** Do you agree that sources undertaking efficiency improvement projects under 111(d) should not trigger NSR permitting requirements for criteria pollutants? Can you provide any technical or legal

analysis or justification for why sources complying with the state 111(d) plan should not (or should) trigger NSR permitting requirements?

Response: Please see the Wisconsin Utilities Joint Response.

- b. **Permit interaction under multiple federal rules.** Do you have concerns about how the different requirements under different rules (i.e., the CO₂ NSPS, the modified and reconstructed source proposal and the existing source proposal) interact for permitting purposes? How should EPA and WDNR handle these interactions?

Response: Please see the Wisconsin Utilities Joint Response.

V. MODIFIED AND RECONSTRUCTED SOURCE PROPOSED RULE.

- a. **BSER.** The baseline for modified steam boilers and fossil fuel gasification units is based on each unit's best historical annual emission rate plus an additional 2% emission reduction. Is this an appropriate baseline? Should EPA use an averaging period in determining a historic emission rate? Is it reasonable to require an additional 2% emission reduction?

Response: Please see the Wisconsin Utilities Joint Response.

- b. **Proposed emission limits.** Are the emission limits that EPA proposes for modified and reconstructed units appropriate?

Response: Please see the Wisconsin Utilities Joint Response.