

Contact Lists for Regional Haze Revision 2013

Federal Land Managers

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State Air Quality Contacts

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Director, Air Quality Division
Texas Commission on Environmental Quality
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From: Bradley, Cheryl
Sent: Wednesday, March 20, 2013 4:27 PM
To: 'bates@adeq.state.ar.us'; 'rbrunetti@kdheks.gov'; 'michael.vince@la.gov'; 'kyra.moore@dnr.mo.gov'; 'shelley.schneider@nebraska.gov'; 'david.brymer@tceq.texas.gov'; 'Tim_Allen@fws.gov'; 'jlogan@fs.fed.us'; 'Patricia_F_Brewer@nps.gov'; 'baanderson02@fs.fed.us'
Cc: Theresa Pella; Singletary, Robert; Kirlin, Brooks; Terrill, Eddie; Warden, Lee; Thomas, Scott; Botchlet-Smith, Beverly; Guy Donaldson (donaldson.guy@epa.gov); Carrie Paige (paige.carrie@epa.gov); Robinson.Jeffrey@epa.gov
Subject: Oklahoma's Proposed Regional Haze & Interstate Transport SIP Revisions

Dear Federal Land Managers and State Air Program Directors:

The State of Oklahoma has prepared a proposed Regional Haze State Implementation Plan (SIP) Revision under 40 CFR § 51.308 to address certain disapproved portions of the SIP related to the Best Available Retrofit Technology ("BART") determination for two 490 MW coal-fired steam electric generating units, designated as Units 3 & 4, located at American Electric Power/Public Service Company of Oklahoma's ("AEP/PSO's") Northeastern Power Station in Rogers County, Oklahoma. DEQ has scheduled a public hearing regarding the Regional Haze SIP revision for Monday, May 20, 2013 from 1:00 p.m. to 3:00 p.m. in the 1st Floor Multipurpose Room of the DEQ, 707 North Robinson Avenue, Oklahoma City, OK 73102. The comment period is scheduled to end at the close of the public hearing. DEQ has set up a webpage to give Federal Land Managers (FLMs) and border/potentially affected states access to a copy of the proposed SIP revision and related materials in advance of posting/publishing the hearing notice for the general public. The web address for your advance access is:

http://www.deq.state.ok.us/aqdnew/RulesAndPlanning/Regional_Haze_rev2013

On January 27, 2012, the U.S. Environmental Protection Agency ("EPA") partially approved and partially disapproved the Oklahoma's Regional Haze SIP (76 Fed.Reg. 81727). In the same action, EPA disapproved portions of Oklahoma's Interstate Transport SIP for the 1997 8-hour Ozone and 1997 PM_{2.5} NAAQS, as well as the Regional Haze SIP's Long Term Strategy because they relied on the disapproved portions of the Regional Haze SIP.

This revision implements relevant portions of a settlement agreement reached among EPA, the Oklahoma Secretary of Environment, DEQ, U.S. Department of Justice, AEP/PSO and the Sierra Club. It is intended to replace the related EPA-issued Federal Implementation Plan (FIP) as it relates to the subject facility. The proposed SIP revision also includes revisions to affected portions of the Interstate Transport SIP, submitted in May 2007 (including supplemental information submitted in November 2007), and is intended to replace the related EPA-issued FIP as it relates to the subject facility.

This notification is intended to provide your agency with an opportunity for consultation at least 60 days before the public hearing on this implementation plan revision. This consultation will give you the opportunity to discuss, by conference call or in person if you prefer, your assessment of:

- Impairment of visibility at the Wichita Mountains and at other Class I areas;
- Recommendations on the development of reasonable progress goals; and
- Recommendations on strategies to address visibility impairment.

Simultaneous with this notification, we are submitting this proposed Regional Haze SIP revision to EPA Region VI with a request for parallel processing in accordance with the settlement agreement and EPA policy guidance. Notice of the public hearing and comment period will be posted by Tuesday, April 19, 2013 on DEQ's Regional Haze webpage:

http://www.deq.state.ok.us/aqdnew/RulesAndPlanning/Regional_Haze/index.htm

Following the close of the hearing and comment period, DEQ will evaluate all comments, and make available a record of the

hearing, a copy of all written comments received, a response to comments document, and the finalized Regional Haze SIP Revision on the same webpage when it is ready for submittal to EPA.

Written comments regarding the proposed revision to Oklahoma's Regional Haze SIP should be emailed to Ms. Bradley at Cheryl.Bradley@deq.ok.gov or mailed to:

Department of Environmental Quality, Air Quality Division P.O. Box 1677

Oklahoma City, Oklahoma 73101-1677

ATTN: Cheryl E. Bradley

If you have questions, please contact me or Eddie Terrill, Director of DEQ's Air Quality Division, at (405) 702- 4100.

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
Notice of Public Hearing and Opportunity for Comment
Revision to Regional Haze State Implementation Plan
Including Revisions to Affected Portions of the Interstate Transport SIP
for the 1997 8-hour Ozone and 1997 PM_{2.5} NAAQS

The Oklahoma Department of Environmental Quality (DEQ) hereby announces a public hearing and an opportunity to comment on a proposed revision to Oklahoma's Regional Haze State Implementation Plan (SIP). The hearing will be held on Monday, May 20, 2013 from 1:00 p.m. to 3:00p.m., in the 1st Floor Multipurpose Room of the DEQ headquarters, 707 North Robinson Avenue, Oklahoma City, OK 73102.

Under the Oklahoma Clean Air Act (27A OS §§2-5-101 thru 117), DEQ is given the primary responsibility and authority to prepare and implement Oklahoma's air quality management plan, compiled in 40 CFR Part 52, Subpart LL. The DEQ prepared and submitted the original Regional Haze SIP in February 2010, to comply with the requirements contained in the federal Clean Air Act and 40 CFR Part 51, Subpart P, Protection of Visibility. On January 27, 2012, the U.S. Environmental Protection Agency ("EPA") partially approved and partially disapproved the Regional Haze SIP (76 Fed.Reg. 81727). In the same action, EPA disapproved portions of Oklahoma's Interstate Transport SIP, as well as the Regional Haze SIP's Long Term Strategy because they relied on the disapproved portions of the Regional Haze SIP. This revision addresses those disapproved portions of the Regional Haze SIP that relate to the American Electric Power/Public Service Company of Oklahoma ("AEP/PSO") Northeastern Power Station Units 3 and 4.

All persons interested in these matters are invited to submit written comments prior to the scheduled close of the public hearing (i.e., 3:00 p.m. on Monday, May 20, 2013) and/or provide oral comments at the public hearing. Persons planning to comment at the hearing may submit a written statement and/or additional information relevant to this matter for inclusion in the record of proceedings of the public hearing. The hearing officer may limit the length of oral presentations to allow all those who wish to provide oral comments an opportunity to do so.

The proposed revision is available on the DEQ website at http://www.deq.state.ok.us/aqdnew/RulesAndPlanning/Regional_Haze. Copies may also be obtained from the Department by contacting Cheryl E. Bradley, Environmental Programs Manager, at (405) 702-4100 or Cheryl.Bradley@deq.ok.gov. Following the close of the hearing and comment period, DEQ will evaluate all comments, and make available a record of the hearing, a copy of all written comments received, a response to comments document, and the finalized Regional Haze SIP Revision on the same webpage when it is ready for submittal to EPA.

Written comments regarding the proposed revision to Oklahoma's Regional Haze SIP should be emailed to Ms. Bradley at Cheryl.Bradley@deq.ok.gov or mailed to:

Department of Environmental Quality, Air Quality Division
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677
ATTN: Cheryl E. Bradley

Comments may be submitted by fax to the Air Quality Division, ATTN: Cheryl E. Bradley, at (405) 702-4101.

Should you desire to attend the public hearing but have a disability and need an accommodation, please notify the Air Quality Division three (3) days in advance at (405) 702-4216. For the hearing impaired, the TDD relay number is 1-800-522-8506 or 1-800-722-0353, for TDD machine use only.



United States Department of the Interior



FISH AND WILDLIFE SERVICE

National Wildlife Refuge System

Branch of Air Quality

7333 W. Jefferson Ave., Suite 375

Lakewood, CO 80235-2017

IN REPLY REFER TO:
FWS/ANWS-AR-AQ

April 15, 2013

Ms. Cheryl E. Bradley
Oklahoma Department of Environmental Quality
Air Quality Division
P. O. Box 1677
Oklahoma City, Oklahoma 73101-1677

Dear Ms. Bradley:

The U. S. Fish and Wildlife Service (FWS) appreciates the opportunity to review and comment on the Oklahoma Department of Environmental Quality (ODEQ) Proposed Best Available Retrofit Technology (BART) Determinations for American Electric Power/Public Service Company of Oklahoma (AEP/PSO) Northeastern Power Station Units 3 and 4. The proposal would include retiring Northeastern Unit 4, and installing dry sorbent injection, a fabric filter baghouse and other controls at Northeastern Unit 3, by April 16, 2016.

We would be glad to discuss the comments provided and are willing to work with ODEQ to address any of the issues discussed in this letter. We compliment you on your hard work and dedication to the significant improvement in our nation's air quality related values and visibility.

Sincerely,

Sandra V. Silva

Chief, Branch of Air Quality

Enclosure (1)



Comments on the Revised Best Available Retrofit Technology Determination for American Electric Power/Public Service Company of Oklahoma Northeastern Power Station Units 3 and 4

The U. S. Fish and Wildlife Service (FWS) appreciates the opportunity to review and comment on the Oklahoma Department of Environmental Quality (ODEQ) Proposed Best Available Retrofit Technology (BART) Determinations for American Electric Power/Public Service Company of Oklahoma (AEP/PSO) Northeastern Power Station Units 3 and 4. The proposal would include retiring Northeastern Unit 4, and installing dry sorbent injection, a fabric filter baghouse and other controls at Northeastern Unit 3, by April 16, 2016.

Reference to the relevant authority within the U. S. Environmental Protection Agency (EPA) regulations that provide for this BART action should be included in the Proposed BART documentation.¹ 40 CFR Part 51, Appendix Y, section V states, “You should consider allowing sources to “average” emissions across any set of BART-eligible emission units within a fence line, so long as the emission reductions from each pollutant being controlled for BART would be equal to those reductions that would be obtained by simply controlling each of the BART-eligible units that constitute BART-eligible source.”² This may be the regulatory citation that could provide for the BART action that is being taken.

On Page 6 of the Revised BART Determination it states that all cost analyses were based on an 85% capacity factor. Appendix Y states, “When you project that future operating parameters (e.g., limited hours of operation or capacity utilization, type of fuel, raw materials or product mix or type) will differ from past practice, and if the projection has a deciding effect on the BART determination, then you must make these parameters or assumptions into enforceable limitations. In the absence of enforceable limitations, you calculate baseline emissions based upon continuation of past practice.”³ This would indicate that an 85% capacity limitation should be placed in the permits of the units operating under the proposed BART. It is clear that ODEQ is

¹ 40 CFR Part 51, Appendix Y provides the federal regulations required to be met by sources that have been determined to be subject to BART. PSO Northeastern Units No. 3 and No. 4 have been determined to be subject to BART. Further, 750 MW power plants are required, “. . . to meet specific control levels for SO₂ of either 95 percent control or 0.15 lbs/MMBtu, for each EGU greater than 200 MW that is currently uncontrolled unless you determine that an alternative control level is justified based on a careful consideration of the statutory factors.” (40 CFR Part 51, Appendix Y, Section IV.E.4). Units No. 3 and No. 4 are required to meet the presumptive levels of control described above, since even if one is shut down, the other will be part of a power plant that generates greater than 750 MW due to Units No. 1 and No. 2 making the power plant generate greater than 750 MW. Appendix Y, Section I.E.3., requires that sources meet BART as expeditiously as possible, but not later than five years after EPA approves the Oklahoma Regional Haze State Implementation Plan (SIP). This could presumably be a date in 2018. The unit that continues to operate after 2018 will still have a 0.4 lbs/MMBtu emission rate and will not meet the presumptive control level for SO₂, thus not complying with BART. There is some question as to whether an Alternative to BART is available in this instance, since 40 CFR 308(e)(2)(ii) states that an, “. . . alternative measure will apply, at a minimum, to all BART-eligible sources in the State.”

² See 40 CFR Part 51, Appendix Y, section V.

³ Ibid., See section IV.D.STEP 4.d.2.

fully cognizant that BART emission limits must be reflected in the sources' operating permits. The Settlement Agreement also can serve to meet this requirement. All of the permits or other enforceable commitments should be posted as an appendix to the BART section of the Regional Haze State Implementation Plan (SIP). This should include emission limitations of zero on the unit that is will be closed.

The fourth paragraph of page 11 in the Revised BART Determination justifies selection of a dry sorbent injection (DSI) system for SO₂ control over the Dry Flue Gas Desulfurization/Spray Dry Absorber (DFGD/SDA) solution by asserting that the latter solution provides only incremental reductions in emissions of SO₂ that do not result in a "perceptible improvement" in visibility. It is incorrect to dismiss a control strategy on the basis that the resulting improvement is not perceptible or significant. EPA states in the preamble to its BART Guidelines that:

"Even though the visibility improvement from an individual source may not be perceptible, it should still be considered in setting BART because the contribution to haze may be significant relative to other source contributions in the Class I areas. Thus, we disagree that the degree of impairment should be contingent upon perceptibility. Failing to consider less-than-perceptible contributions to visibility impairment would ignore the Clean Air Act's (CAA) intent to have BART requirements apply to sources that contribute to, as well as cause, such impairment."⁴

The erroneous imperceptibility discussion should be removed since the last sentence of the paragraph correctly provides a cost per deciview improvement analysis for each control alternative. It should be noted that the cost per deciview of visibility improvement that is stated for *each* control alternative is consistent with other states' determinations of reasonable cost per deciview.

It should be further noted that the \$1,544 cost per ton of SO₂ control for the DFGD/SDA control option is considered reasonable, since several other BART determinations in the nation have proposed costs greater than \$1,544 per ton of SO₂ control. It is acknowledged that costs related to non-air quality environmental impacts are a relevant factor to consider as pointed out in the ODEQ analysis. The point that both cost per ton and cost per deciview are reasonable for *each* control alternative is brought up only to confirm that the DFGD/SDA alternative should not have been dismissed on the basis of excessive cost under BART, but because DSI was chosen on the basis of lower cost. Either control alternative seemed to meet the constraints of the five-factor BART analysis.

⁴ See Federal Register, July 6, 2005, 70FR30129, middle column.



United States
Department of
Agriculture

Forest
Service

Ouachita, Ozark and St. Francis
National Forests

P.O. Box 1270
Hot Springs, AR 71902

File Code: 2580

Date: April 30, 2013

Ms. Cheryl E. Bradley
Oklahoma Department of Environmental Quality
Air Quality Division
P.O. Box 1677
Oklahoma City, OK 73101-1677

RECEIVED
MAY 20 2013
AIR QUALITY

Dear Ms. Bradley:

The U.S. Forest Service (FS) appreciates the opportunity to review and comment on the Oklahoma Department of Environmental Quality (ODEQ) Proposed Best Available Retrofit Technology (BART) Determinations for American Electric/Public Service Company of Oklahoma (AEP/PSO) Northeastern Power Station Units 3 and 4.

We are providing these comments to ODEQ and ask that they be placed in the official public record. We look forward to your response as per section 40 CFR51.308(i)(3) and we are willing to work with ODEQ staff towards addresssing any of the issues discussed in this letter.

Again, we appreciate the opportunity to work closely with ODEQ, and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

JUDITH L. HENRY
Forest Supervisor

NORMAN L. WAGONER
Forest Supervisor



FS Comments regarding ODEQ's Proposed Regional Haze Implementation Plan Revision of March 20, 2013

The Forest Service appreciates the opportunity to comment on the proposed Regional Haze plan revision.

Oklahoma submitted a Regional Haze (RH) plan to the Environmental Protection Agency (EPA) on February 19, 2010. On March 22, 2011, EPA proposed to partially approve and partially disapprove certain elements of Oklahoma's State Implementation Plan (SIP) (76 FR 16168) regarding six units at the following Electrical Generating Units (EGUs): Units 4 and 5 of the Oklahoma Gas and Electric Muskogee plant in Muskogee County; Units 1 and 2 of the Oklahoma Gas and Electric Sooner plant in Noble County; and Units 3 and 4 of the American Electric Power/Public Service Company of Oklahoma Northeastern plant in Rogers County. In EPA's subsequent Federal Implementation Plan (FIP), with regard to their March 22, 2011 partial disapproval, to meet Best Available Retrofit Technology (BART), those six units are required to reduce their SO₂ pollution to an emission rate of 0.06 lb/mmBTU. To accomplish this, EPA suggested that these units be retrofitted with Dry Flue Gas Desulfurization/Spray Dry Absorber (DFGD/SDA) technology.

It is our understanding that the Proposed Regional Haze Implementation Plan Revision submitted by ODEQ on March 20, 2013 addresses only control modifications at Units 3 and 4 of the American Electric Power/Public Service Company of Oklahoma Northeastern plant in Rogers County. Therefore, we are limiting our comments to the efficacy of those proposed controls.

As proposed by ODEQ, the SO₂ emission rates for Units 3 & 4 will each be lowered from the present 0.9 lb/mmBTU, utilizing dry sorbent injection (DSI) to 0.65 lb/mmBTU by January 21, 2014, and then to 0.60 lb/mmBTU by December 21, 2014. And, by April 26, 2016, the SO₂ emission rate for Unit 3 is proposed for further reduction to 0.4 lb/mmBTU (Table II-2), while Unit 4 will be shut down. While these proposed reductions would be a clear improvement from present levels, all are considerably less stringent than EPA's and the Forest Service's preferred BART level of 0.06 lb/mmBTU, utilizing DFGD/SDA. It appears ODEQ rejects the use of DFGD/SDA asserting on page 11 of its revised BART determination that the incremental reductions in emissions will not result in "perceptible improvement" in visibility. Based on the preamble to EPA's BART Guidelines:

"Even though the visibility improvement from an individual source may not be perceptible, it should still be considered in setting BART because the contribution to haze may be significant relative to other source contributions in the Class I areas."¹

Thus, we disagree that the degree of impairment should be contingent upon perceptibility. Failing to consider less-than-perceptible contributions to visibility impairment would ignore the Clean Air Act's (CAA) intent to have BART requirements apply to sources that contribute to, as well as cause, such impairment.

Therefore, the perceptibility of improvement should not be a factor in determining BART. It is also noted that the cost per deciview of visibility improvement that is stated for each control alternative is consistent with other states' determinations of reasonable cost per deciview, and the

¹ See Federal Register, July 6, 2005, 70FR30129, middle column.

\$1,544 cost per ton of SO₂ control is reasonable when compared with options utilized across the country. Further, while the cost per ton for DSI is 65% of the more cost effective DFGD/SDA option, the utilization of DFGD/SDA is well over six times more efficient at removing SO₂ (See Table 8 in ODEQ's March 20, 2013 Revised BART Determination).



American Electric Power
1 Riverside Plaza
Columbus, OH 43215-2373
AEP.com

May 17, 2013

Steven A. Thompson
Executive Director
Oklahoma Department of Environmental Quality
707 North Robinson
P.O. Box 1677
Oklahoma City, OK 73101-1677

Re: Revised BART Determination and Amended Regional Haze Agreement
Public Service Company of Oklahoma – Northeastern Units 3 and 4

Dear Mr. Thompson:

Public Service Company of Oklahoma (“PSO”) appreciates the opportunity to submit comments on the proposed adoption of a Revised BART Determination and First Amended Regional Haze Agreement. These actions will revise Oklahoma’s Regional Haze State Implementation Plan (“RH-SIP”) by incorporating the provisions of the recent settlement between PSO, the U.S. Environmental Protection Agency (“EPA”), the Oklahoma Department of Environmental Quality (“ODEQ”) and others, and is intended to replace the Federal Implementation Plan (“FIP”) adopted by EPA for these units on January 27, 2012 (76 Fed. Reg. 81,727). PSO appreciates ODEQ’s diligence in completing the RH-SIP revisions within the time frame outlined in the settlement agreement, and the careful analysis performed by the Department to confirm that the revised RH-SIP satisfies the requirements contained in the Clean Air Act and 40 CFR Part 51, Subpart P, Protection of Visibility.

PSO specifically would like to respond to a recent request by Attorney General Pruitt’s office to delay the hearing scheduled for Monday, May 20, 2013. That request urges ODEQ to re-evaluate the revised RH-SIP based on changes in PSO’s load profile and the cost of replacement power necessary to offset the retirement of one Northeastern coal-fired unit in 2016. However, the BART analysis ODEQ is required to undertake is a narrowly focused analysis that looks only at the relative cost of environmental controls on the BART-eligible units, and ODEQ’s selection of the alternative that represents the “best available retrofit technology” for those units, as defined in the Clean Air Act. While ODEQ has the discretion to consider costs associated with the energy demands of the control equipment, and other non-air environmental

impacts associated with the operation of particular control devices in its analysis of the most cost-effective option to address the visibility concerns that are the focus of the regional haze program, ODEQ does not have the authority or the expertise to evaluate replacement resources or the adequacy of PSO's full complement of resources to meet customer demand.

PSO regularly evaluates and reports to the Oklahoma Corporation Commission on its resource plans, and, as noted in the letter, has announced its intention to submit a revised resource plan to the Commission in the near future. That revised resource plan will not provide any other relevant information to ODEQ that is necessary in order to complete its evaluation of the revised RH-SIP. Nothing in that plan will alter the relative costs of the various emission control options studied in the BART analysis submitted by PSO, or ODEQ's evaluation of the costs, energy impacts, and visibility improvements associated with the various alternatives studied. Accordingly, there is no reason to delay the public hearing or to defer any decision on the adequacy of the revised RH-SIP developed by ODEQ.

The letter also claims that it is "arguable" that the revised RH-SIP is more stringent than the previously issued EPA FIP. However, there is no evidence that the revised SIP would impose more stringent emission reduction requirements than the current FIP. The primary focus of the revised RH-SIP for Northeastern Unit 3 and Northeastern Unit 4 is the choice of BART controls for SO₂ emissions. Under the FIP, each Northeastern Unit would be required to meet a 0.06 #/mmBtu emission rate. EPA's basis for meeting this limit is the installation of high-efficiency dry scrubbers on both units by January 2017. Under the SIP, one Northeastern Unit will retire and the other will be equipped with a dry sorbent injection system that is capable of achieving a 0.4 #/mmBtu emission rate. This rate is clearly a compromise between the 0.65 #/mmBtu rate that was included in the prior RH-SIP and the rate approved in the FIP. As demonstrated in the Revised BART Determination (at page 11) the revised RH-SIP reduces SO₂ emissions by approximately 24,888 tons per year while the FIP would reduce emissions by approximately 29,119 tons per year. However, the cost per ton of SO₂ reductions under the RH-SIP is \$1,005 per ton, while the cost per ton of SO₂ reductions under the FIP is \$1,544 per ton. The incremental cost to achieve the additional 4,231 tons of reductions under the FIP is \$4,718 per ton, and would not result in any perceptible improvement in visibility. As demonstrated in the Revised BART Determination, the revised RH-SIP is an effective, but more moderate and cost-effective approach to visibility improvement than the currently approved FIP.

PSO appreciates the opportunity to comment on the revised RH-SIP, and urges ODEQ to carefully evaluate the comments submitted during the public comment period, and finalize the revised RH-SIP promptly.

Respectfully submitted,

A handwritten signature in black ink, reading "Janet J. Henry". The signature is fluid and cursive, with the first name "Janet" being more prominent than the last name "Henry".

Janet J. Henry
Deputy General Counsel
American Electric Power Service Corporation

cc: The Honorable E. Scott Pruitt, Attorney General
Cheryl E. Bradley (via electronic mail)
Robert Singletary, Esq. (via electronic mail)
Stephanie Talbert, Esq. (via electronic mail)



E. SCOTT PRUITT
ATTORNEY GENERAL

May 15, 2013

Steven A. Thompson, Executive Director
Oklahoma Department of Environmental Quality
707 N. Robinson
P.O. Box 1677
Oklahoma City, OK 73101-1677

Re: PSO/EPA Settlement Agreement- Revised State Implementation Plan

Dear Mr. Thompson:

As you are aware, the PSO/EPA settlement plan, upon which the revised State Implementation Plan ("SIP") is based, required that Public Service Corporation of Oklahoma ("PSO") decommission one of its coal-fired generation facilities by 2016. The 2012 PSO Integrated Resource Plan ("IRP") provided for the replacement of only 260 MWs of the 500 MW coal-fired generation plant that is scheduled for closure. As such, the cost estimates for the SIP settlement plan are premised upon replacement of roughly only one-half of that plant's capacity and energy. Recently, PSO announced its intention to submit a revised IRP at the Oklahoma Corporation Commission to amend its 2012 IRP. The stated purpose of this amended IRP is to include approximately 250 MWs of electric load that will be served by PSO in the 2016 time frame.

Because PSO has added additional load which now requires a revision to the 2012 IRP, the cost information concerning the PSO/EPA settlement plan and, hence, the revised SIP, may be inaccurate to a degree that cannot be determined at this time. As such, cost assessments that have been conducted in the PSO proceeding at the Corporation Commission and by the Oklahoma Department of Environmental Quality ("DEQ") in association with the SIP are based on incomplete and inaccurate data (see revised paragraph 12 in First Amended Regional Haze Agreement). More accurate cost information will be developed after PSO submits its amended IRP in June of this year and includes the entire 500 MWs of needed capacity/energy as opposed to only 260MWs.

In addition, Title 27A O.S. §1-1-206 "Economic Impact—Environmental Benefit Statement" requires a state environmental agency to duly determine the economic impact and environmental benefit of a permanent rule that is more stringent than corresponding federal requirements, unless such stringency is specifically authorized by state statute. It is certainly arguable that the proposed revised SIP for PSO is more stringent than the previously issued EPA FIP. Without accurate updated



May 15, 2013
Page 2

cost information from PSO's revised IRP, it seems unlikely that any economic impact – environmental benefit statement compiled by DEQ would be accurate.

Based on the above, I respectfully request that DEQ delay the public meeting scheduled for May 20, 2013, and delay a final decision regarding the SIP, until PSO's amended IRP can be fully vetted in proceedings at the Corporation Commission. The 2013 IRP process will yield additional information that will provide the opportunity to ascertain the true cost of the SIP that is required in proceedings at both the Corporation Commission and the DEQ.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Scott Pruitt", with a stylized flourish extending from the end.

E. Scott Pruitt
Attorney General

COMMENTS TO ODEQ RE PSO COMPLIANCE PLAN TO IMPROVE OKLAHOMA'S AIR QUALITY

My name is Bob Rounsavell. I'm here today as a resident of Oologah, as a Sierra Club member and as president of the Carrie Dickerson Foundation.

I think this agreement reached between PSO and EPA, Oklahoma and Sierra Club is a great start in improving our air quality. Although I wish that the 2nd coal fired unit could be phased out much sooner than 2026, I realize the most important significance is the collaboration by these stakeholders in reaching this agreement.

The agreement will bring about environmental benefits resulting in significant health benefits. By 2026 sulfur dioxide emissions from the northeastern plant will be eliminated. Elimination of mercury and other toxins with phasing out of the two coal units will help improve health conditions, especially for Oologah residents. Mercury may very well have been the cause of my wife's colon cancer after residing for a decade only a mile from the two coal units and half a mile from the train tracks with the many coal trains every week. Fortunately, her indomitable spirit prevailed.

And then we have carbon dioxide, the main cause of global warming and severe climate disruption. Reducing CO₂, which this agreement will accomplish, will greatly improve chances for human survival. Unfortunately, many are still in denial about this well-researched phenomenon.

Economically the PSO rate plan is most beneficial as it offers the lowest impact on commercial, industrial and residential customers.

I understand that some large industrial users want scrubbers installed so the coal units can continue operating until 2041, thus extending the dirty emissions while reaping high profits.

The plan paves the way for solving public health concerns about pollution from burning coal. I live near the northeastern plant and it's high time my health was protected. ODEQ should approve the PSO plan. It's cleaner, it will support Oklahoma jobs, and it will keep ratepayer money close to home.

If you live in Oologah, own a white motor vehicle and leave the windows in your house open, then you have problems. I can go outside many days and write my name on my white car. Leaving the windows open for fresh air invites a whole bunch of coal dust inside the house. This soot coming into the house is not the same as normal dust; it's highly toxic. This plan is a necessary start to improving air quality for the future.

Carrie Dickerson saw the need for cleaner, renewable energy sources which we have in abundance in Oklahoma. She spent much of her life promoting clean, renewable energy, especially wind power.

So as president of the Carrie Dickerson Foundation and on its behalf, I thank PSO, Oklahoma, EPA and Sierra Club for having the courage and foresight to change the status quo. We'll all live longer because of this proposed plan.

Thank you.

Bob D. Rounsavell



Jamie Maddy
Director - Regulatory

May 20, 2013

Sent via email to Cheryl.Bradley@deq.ok.gov

Department of Environmental Quality
Air Quality Division
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677
ATTN: Cheryl E. Bradley

Re: Comments on Proposed Regional Haze SIP Amendment

To Whom it May Concern:

Chesapeake Energy Corporation ("Chesapeake") submits the following comments in support of the Oklahoma Department of Environmental Quality's ("DEQ") proposed revision to Oklahoma's Regional Haze State Implementation Plan ("SIP"). See DEQ Case No. 10-025. Under the Oklahoma Clean Air Act (27A OS §§2-5-101 thru 117), DEQ is given primary authority and responsibility for preparing and implementing the air quality management plan for the State of Oklahoma, compiled in 40 CFR Part 52, Subpart LL. DEQ originally prepared and submitted its Regional Haze SIP in February 2010 in compliance with the federal Clean Air Act and 40 CFR Part 51, Subpart P, Protection of Visibility. On January 27, 2012, the U.S. Environmental Protection Agency ("EPA") partially approved and partially disapproved the Regional Haze SIP. See 76 Fed. Reg. 81,727.

In fact, EPA accepted the majority of Oklahoma's state plan. However, the limited portion of the Oklahoma SIP that was disapproved was rejected principally because of the emission limits set for sulfur dioxide ("SO₂") for six coal-fired electric generating units, including four Oklahoma Gas and Electric ("OG&E") units, and relevantly, two units at the Public Service Company of Oklahoma ("PSO") Northeastern Power Station (Units 3 and 4) in Rogers County, Oklahoma. EPA noted that the "state's cost estimates for SO₂ scrubbers were high in comparison to other units, and [EPA] therefore separately assessed the costs ..." 76 Fed. Reg. 81,727. As a result, EPA concluded that "Oklahoma's costing methodology was not in accordance with RH requirements." *Id.*

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Consequently, EPA "proposed a Federal Implementation Plan ("FIP") to address these defects in BART . . ." which became effective January 27, 2012. Id. Relevantly, "[t]he FIP established

Dry Flue Gas Desulfurization with a Spray Dry Absorber" for PSO's Northeastern affected units. See Oklahoma Department of Environmental Quality, Air Quality Division, Revised BART Determination, March 19, 2013. However, at the encouragement and request of the Oklahoma Secretary of Environment and the Oklahoma Secretary of Energy, along with the Attorney General of Oklahoma, PSO participated in comprehensive discussions with state officials to develop an Oklahoma centric plan to all of the federal requirements affecting electric generating units with DEQ as the coordinator. See Attachment 1.

As a result, on March 26, 2013, DEQ entered the "First Amended Regional Haze Agreement" to satisfy the Best Available Retrofit Technology ("BART") requirements associated with the SO₂ and nitrogen oxides ("NO_x") requirements at PSO's Northeastern Power Station Units 3 and 4. The proposed SIP revision addresses the disapproved portion of the Regional Haze SIP as it relates to the BART determination for these units. The proposed revision implements relevant portions of a settlement agreement reached among PSO, EPA, the Oklahoma Secretary of Environment, U.S. Department of Justice, and the Sierra Club.

1. The First Amended Regional Haze Agreement is BART Compliant Significantly and Affordably Addresses Regional Haze With Substantial Environmental Benefits
Specifically, under the First Amended Regional Haze Agreement, PSO has committed to install low NO_x combustion technologies and achieve a lower NO_x emissions rate for both Units 3 and 4. In addition, PSO will comply with a new, lower SO₂ emission rate for both Units 3 and 4 in 2014 – and an even lower rate in 2015. Finally, PSO will retire one of the coal-fired generating units at the Northeastern Power Station by April 16, 2016, "and therefore the removal of NO_x, SO₂, PM, and CO₂, emissions from the unit" will also be achieved. Id. These will represent significant emissions reductions that will benefit Oklahoma.

In DEQ's BART Determination, it was concluded that "[t]hese reductions will help to address local formation and interstate transport of ozone and reduce the contribution to greenhouse gasses and mercury deposition from electricity generation in Oklahoma." Id. This result strategically addresses regional haze requirements.

Additionally, this plan places actual emissions reductions in place sooner than the FIP would have. In fact, "[t]he FIP scenario provides no further improvement in ozone and would likely assure continued use of coal-fired electricity generation for an additional 20 years beyond the settlement agreement scenario." Id. Further, the settlement agreement, "while achieving perceptively equivalent visibility improvements at the Class I areas, will not require water usage and in shutting down Northeastern Unit 4 rather than installing additional controls, energy consumption is half that of the control solution established by the FIP." This plan provides a

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litany of environmental benefits for Oklahoma. Decisions regarding emissions controls are as much art as science. Since the modern day version of the federal Clean Air Act was adopted in the early 1970s, decisions have been made without the benefit of absolute certainty. The First Amended Regional Haze Agreement between DEQ and PSO outlines emissions controls and installation schedules designed to meet the BART requirements in a manner that is agreeable to both parties and protective of the environment.

Moreover, this approach provides consistency and predictability to the process. The technology at issue, and the overall compliance plan, has been adequately vetted by engineers and will meet the objectives necessary to comply with BART and related Regional Haze requirements. Accepting this proposal for submission to EPA allows PSO to plan for compliance and address its needs as well as the needs of the ratepayers.

2. The First Amended Regional Haze Agreement Provides an Oklahoma-Centered solution by leaning on Oklahoma resources to reduce power plant emissions and provide reliable electricity. In the original Regional Haze Agreement, it was acknowledged that in the event EPA rejected the SIP as it ultimately did in part, a BART alternative would result in switching one "coal-fired unit to natural gas."

Additionally, EPA has long acknowledged that greater utilization of cleaner burning natural gas is a means for both PSO and OG&E to meet their BART obligations under federal law. From the beginning, this native Oklahoma resource has been a viable, economic solution. This First Amended Regional Haze Agreement will, in part, result in greater utilization of natural gas and, consequently, will have a significant positive impact on Oklahoma's economy.

Given the supply and availability of natural gas in Oklahoma, the use of natural gas-fired power generation will not result in significant rate increases as compared to installing expensive emission control retrofits on aging coal-fired power plants to address regional haze. Oklahoma consistently ranks 3rd in the nation after Texas and Wyoming in the production of natural gas, with production projected to continue to increase significantly over the next decade and beyond. It is right for Oklahoma utilities to lean upon the many benefits of Oklahoma natural gas.

In fact, in the public testimony before the Oklahoma Corporation Commission related to PSO, Steven L. Fate, the Director of Business Operations Support for PSO, acknowledged that greater natural gas consumption, resulting from the First Amended Regional Haze Agreement, is consistent with Oklahoma's energy policies. Mr. Fate estimates that:

[t]he average incremental natural gas production is estimated to be 39 thousand MMBTU from 2027-2040. Assuming an average annual Henry Hub price of natural gas of \$4.37 per MCF, the natural gas volume is valued at approximately \$166 million annually. The value of natural gas times the economic multiplier provides a total output of \$239 million annually in economic activity for the state.

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Rebuttal Test. of Steven L. Fate on behalf of Pub. Serv. Company of Okla., PUD 201200054, at 14.

Oklahoma's Energy Plan calls for a strategy that increases reliance on Oklahoma resources for power generation which, according to the plan, helps preserve Oklahoma's relative low cost of energy and electricity while simultaneously strengthening the economy our air quality. PSO, DEQ, and other Oklahoma's leaders should be commended for developing an Oklahoma strategy of our own, one that benefits our state by meeting federal environmental regulation while utilizing our own natural resources which benefits all Oklahomans and our economy in the immediate and long term.

Chesapeake supports the adoption of the First Amended Regional Haze Agreement.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jamie Maddy".

Jamie Maddy
Director – Regulatory

Chesapeake Energy Corporation

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This document compiles emailed comments from the general public. Personal email addresses and phone numbers have been redacted from this document prepared for general distribution, in order to protect privacy.

From: [email address redacted]

Sent: Monday, May 20, 2013 12:18 PM

To: Bradley, Cheryl; Thomas, Scott

Subject: Regional Haze Plan

The following message has been sent by David Brooke

Dear Cheryl and Scott, I am all for quality clean air in Oklahoma but how it is achieved is a balance between man and nature. I don't understand how alleged pollution from PSO in north eastern Oklahoma affects the wildlife in southwest Oklahoma. Wouldn't OG&E's alleged pollution affect the wildlife refuge as it is closer? The closing down of power plants will not be good for Oklahoma. I have to question the method that was used to determine the alleged pollution. I ask that you review this method and not move forward with closing power plants and driving the cost of electricity up for all consumers. Maybe help us to legalize industrial hemp for bio-diesel that is not a polluter. Attorney General Scott Pruitt has pointed out the problems with incomplete and inaccurate information. A rush to end coal power plants without a proven backup source is dangerous and irresponsible. I am open to all sorts of power but wind and solar cannot fill the needs of all Oklahomans. Even natural gas by itself won't fill the bill. Thank you.

From: Steve Jackson [email address redacted]

Sent: Sunday, May 19, 2013 2:52 PM

To: Bradley, Cheryl

Subject: I don't want the EPA and Sierra Club raising my electricity rates

Cheryl,

I don't want the EPA and Sierra Club raising my electricity rates. If it bothers *them* so much, let them pay it!!! I can't afford to and besides, I am working so hard to pay my present electricity rates that I don't have time to look at the Wichita Mountains. If I did have the time but couldn't see them, I'd drive a couple miles closer.

Bottom line is tell the EPA and Sierra Club to go fly a kite and leave our electric rates alone!

Steve Jackson

From: Bonnie Brown [email address redacted]
Sent: Friday, May 17, 2013 11:19 AM
To: Bradley, Cheryl
Subject: RE: EPA and Sierra Club Working to Raise Utility Rates in Oklahoma

Ms. Bradley;

We would appreciate a veto of this latest proposed utility increase to combat “haze” in the Wichita Mountains Wildlife Refuge.

Proposals such as this, strains the imagination of any educated individual!

Please vote NO to this proposal of change by the Oklahoma Department of Environmental Quality.

Bonnie and Jeff Brown

Broken Arrow, Oklahoma

From: Cheryl Carman [email address redacted]

Sent: Friday, May 17, 2013 11:10 AM

To: Bradley, Cheryl

Subject: Utility Fees

Stop this nonsense right now! We cannot afford a raise in our utility bills, we are paying nearly \$4.00 for a gallon of gas. What are you people doing, trying to ruin the American People? This is insanity, do the honest thing and drop this notion of raising the utilities. Lets see if there are still any honest and honorable people that will fight for the American People

From: jan mayfield [email address redacted]

Sent: Friday, May 17, 2013 9:51 AM

To: Bradley, Cheryl

Subject: Raise in electric

We are being totally drained, the price of gas, groceries, and now you want to increase our electric. What on earth has happened to you people, you are totally brainwashed and have not a drop of compassion on the American people. I live on 779.00 a mo. pay my own secondary ins. rent, utilites. I as many, many others can not afford another increase . I rec. no food stamps I know I would qualify however I choose not to. Thank You and I hope I will not continue to feel shame on you.

Jan Mayfield

Sent from Windows Mail

-----Original Message-----

From: Corey & Jamie [email address redacted]

Sent: Thursday, May 16, 2013 8:37 PM

To: Bradley, Cheryl

Subject: No electric rate increase for combating "regional haze"

Ms. Bradley,

As a long time resident of Oklahoma and PSO customer in the Tulsa area, I respectfully request that the push by the Sierra Club and EPA to raise our rates be denied. We do not need the over-reach of the federal government affecting our pocketbook even more than they already do. The Sierra Club is pushing this phony science called regional haze as a way to push an environmental agenda that is neither best for Oklahoma nor backed by any science stating that it is actually harmful to the environment/health of Oklahoma.

I have contacted my elected state officials and let them know what I and many Oklahomans think of this bogus attempt at ramrodding unwanted, harmful, and burdensome rate hikes. Please consider the the extra cost to the average family, especially on a annual basis for this increase.

Respectfully,

Corey Smith
Broken Arrow, OK

From: Pat [email address redacted]
Sent: Thursday, May 16, 2013 4:13 PM
To: Bradley, Cheryl
Subject: Electric Rates

It seems the EPA and the Sierra Club want to rise our rates by placing mandates on PSO under the guise of "Regional Haze" to improve the visibility in the Wichita Mountains Wildlife Refuge, which is over 260 miles away from the coal fired generating plant. I am so sick and tired of the federal government and it's agencies dictating what has to be done in Oklahoma under some far fetched scheme such as this "regional hazing." Oklahoma provided a perfectly acceptable plan to phase out it's coal fired generators for gas fired ones in a reasonable amount of time. Oklahomans can not afford to have their utility rates increased on top of the sky rocketing grocery and gas prices, the added fees the state legislature is tacking on whenever they see the opportunity and everything else life is throwing our way.

I oppose implementation of the proposed changes which will radically increase our electric bills.

Patrick Sullivan
7713 E 109th St
Tulsa, OK 74133

From: Nancy Hollingshed [email address redacted]

Sent: Thursday, May 16, 2013 4:11 PM

To: Bradley, Cheryl

Subject: Proposed rate hikes

Ms. Bradley,

Please do not let the EPA & Sierra Club put further financial obligations on Oklahomans by raising our utility rates. AEP/PSO just raised our rates an estimated \$20 a month (not the alleged \$12), gasoline prices are spiking out of control along with everything else. Please don't let Oklahoma become an inhabitant unfriendly state.

Sincerely,

Nancy Hollingshed

From: Bobby Grotts [email address redacted]

Sent: Thursday, May 16, 2013 3:49 PM

To: Bradley, Cheryl

Subject: PSO

Hi Cheryl,

I cannot attend the meeting on the 20th so I am emailing you with my opinion. We don't need our PSO rates raised 12 to 15 percent. With gas prices on the rise and grocery prices likewise we don't need an added expense. The EPA and all branches of the federal government have too many regulations now.

We don't want a PSO rate increase in Oklahoma!

Thank you,

Peggy Grotts

A PSO customer

[phone number redacted]

Jenks, Oklahoma

From: carolyn vanhorn [email address redacted]

Sent: Thursday, May 16, 2013 3:33 PM

To: Bradley, Cheryl

Subject:

Ms. Bradley,

We do not want any rate increases for our power in the state of Oklahoma!

Thank you,

Carolyn VanHorn

-----Original Message-----

From: Felice Hill [email address redacted]

Sent: Thursday, May 16, 2013 9:55 AM

To: Bradley, Cheryl

Subject: EPA and Sierra Club

Dear Ms. Bradley:

Please keep the ever encroaching government out of Oklahoma! Not only do we NOT need our electric costs to skyrocket, but the fact that special interests from outside get to dictate and talk about "regional haze" is repugnant! These are our dollars that they spend and this is our state and we should be involved in this discussion!!

I respectfully request that you reject this plan.

Sincerely,

Felice Hill

Tulsa, OK

Sent from my iPhone

From: Cris Kurtz [email address redacted]

Sent: Thursday, May 16, 2013 9:54 AM

To: Bradley, Cheryl

Subject: Against Higher Utilities

Please count myself and my husband as two more against Oklahoma tolerating the EPA to dictate what ultimately results in higher utility rates.

We are having a very difficult time keeping up with the increases in EVERYTHING.

Thank you.

Cris Kurtz

[phone numbers redacted]

P.O.Box 702692

Tulsa, OK 74170

From: Jonathan Ballard [email address redacted]

Sent: Thursday, May 16, 2013 9:47 AM

To: Bradley, Cheryl

Subject: Raise Utility Rates in Oklahoma

Ms. Bradley,

I am against the EPA and Sierra Club placing mandates on PSO under the guise of "regional haze" and raising utility rates in Oklahoma. This is an immeasurable "scientific" standard and will raise our electric rates by up to 12%. We need leaders like you to stand up and make your voice known that we will not accept the unreliable science from EPA.

Will you be an active voice to the EPA? I look forward to hearing from you.

Respectfully,

Jonathan Ballard | Partner

Streetman-Mitchell, Inc.

Commercial / Industrial / Multi-Residential Contractors

[phone numbers redacted]

Dedicated to integrity. Devoted to people.



Please consider the environment before printing this e-mail and

reduce e-mail pollution and aggravation - don't cc unless you have to.

From: Beverly Brown [email address redacted]

Sent: Thursday, May 16, 2013 9:45 AM

To: Bradley, Cheryl

Subject: Stop Regional Hazing

Ms. Bradley, I am opposed to my electric rates with PSO being raised due to the push by environmentalists to stop regional hazing in the Wichita Mountains which is 260 miles away from Tulsa. No more ridiculous rate increases. Please listen to the good people of Oklahoma.

Beverly Brown

[phone numbers redacted]





William F. Whitsitt, Ph.D.
Executive Vice President
Public Affairs

Devon Energy Corporation
333 W. Sheridan
Oklahoma City, OK 73102

405 552 3556 Phone
405 552 1484 Fax
bill.whitsitt@dvn.com

May 20, 2013

Mr. Steve Thompson
Director, Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

Dear Mr. Thompson:

Devon Energy Corporation supports the settlement between Public Service Company of Oklahoma (PSO) and the U.S. Environmental Protection Agency (EPA) addressing the Revision to the Regional Haze State Implementation Plan. Devon requests that the Oklahoma Department of Environmental Quality approve the settlement.

This settlement allows Oklahoma to retain state control and primacy over air regulation. It is also based on the benefits of natural gas, a clean fuel produced locally.

In September 2012, I sent the attached letter on behalf of Devon Energy thanking Governor Fallin for her continued support of the PSO/EPA settlement. In that letter I wrote that the settlement PSO reached allows continued state control of its implementation plan and expanded use of native natural gas while providing PSO the flexibility to continue to operate some of the coal-fired units EPA questioned in its regional haze inquiry. Further, I highlighted the environmental benefits of natural gas which the International Energy Agency has cited as the reason carbon emissions have continued to fall.

Devon's position remains unchanged since the time that letter was written, and we hope that DEQ will approve the settlement.

Thank you for the opportunity to provide comment in this important matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Whitsitt". The signature is fluid and cursive, with a long horizontal line extending from the end.

Cc: Cheryl E. Bradley, ODEQ Air Quality Division



William F. Whitsitt, Ph.D.
Executive Vice President
Public Affairs

Devon Energy Corporation
333 W. Sheridan
Oklahoma City, OK 73102

405 552 3556 Phone
405 552 1484 Fax
bill.whitsitt@dvn.com

September 26, 2012

The Honorable Mary Fallin
Governor of Oklahoma
State Capitol Building, Suite 212
2300 North Lincoln Boulevard
Oklahoma City, OK 73105

Dear Governor Fallin:

Your longstanding support of the oil and natural gas industry is very much appreciated. Devon asks for your continued support for expanded use of natural gas, Oklahoma's domestic fuel, arising from the Public Service Company of Oklahoma's (PSO) settlement agreement with the Environmental Protection Agency (EPA).

As you know, in 2011 EPA determined that the most appropriate way to combat regional haze was through an unprecedented Federal Implementation Plan (FIP) which would require specific fuel and emission control options. In order to control its decision-making process, PSO entered into settlement discussions with the EPA and a settlement is currently being finalized. The settlement allows PSO to retire coal units and replace that power through a Power Purchase Agreement that will rely on clean-burning natural gas. According to PSO, this approach is the lowest-cost alternative and would avoid installing expensive scrubbers on an aging coal generation unit.

The settlement PSO reached allows continued state control of its implementation plan and expanded use of native natural gas while providing PSO the flexibility to continue to operate some of the coal-fired units EPA questioned in its regional haze inquiry. Under the settlement, PSO would:

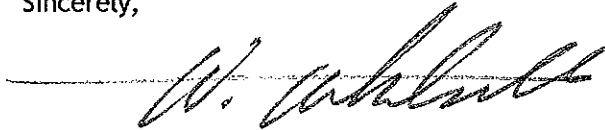
- place emission controls on one coal unit and run it through 2026;
- decommission one coal unit in 2016; and,
- be required to seek purchase power agreements from natural gas and renewable generators.

Devon and other producers in Oklahoma successfully produce significant volumes of natural gas statewide, thanks in large part to the shale gas revolution. A prime example of the industry's success is just 40 miles west of the Capitol in Oklahoma's Cana field. Because of this new development, the US Energy Information Administration's latest data shows that not only does Oklahoma meet its needs, but the state also *exports* more than 63 percent of its production. The bottom line is that Oklahoma producers can meet the state's future increased generation demand.

Certainly the benefits of lower emissions from a cleaner fuel cannot be ignored, either. For example, the International Energy Agency has stated that carbon emissions in the United States fell in 2011, "...primarily due to ongoing switching from coal to natural gas in power generation." Further, EIA month-to-month data reveals that carbon emissions from January to May of this year declined six percent when compared to 2011. Several analysts have credited natural gas as the driving force behind this reduction.

In summary, the settlement PSO entered into with EPA - based on PSO's own business requirements as well as considerations such as those I have outlined - provides an opportunity to take next steps in Oklahoma's clean energy future evolution. Devon supports this approach and thanks you for your continued support of the PSO/EPA settlement.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Whitworth", is written over a horizontal line.

cc: Commission Chair Patrice Douglas
Commission Vice-Chair Bob Anthony
Commissioner Dana Murphy
Secretary of Energy Mike Ming
Secretary of Environment Gary Sherrer
Director Steve Thompson

BEFORE THE
CORPORATION COMMISSION OF OKLAHOMA

APPLICATION OF PUBLIC SERVICE COMPANY OF)
OKLAHOMA FOR COMMISSION AUTHORIZATION)
OF A PLAN AND COST RECOVERY OF ACTIONS)
OF PSO TO BE IN COMPLIANCE WITH CERTAIN)
ENVIRONMENTAL RULES PROMULGATED BY)
THE UNITED STATES ENVIRONMENTAL)
PROTECTION AGENCY; SUCH ACTIVITIES TO)
INCLUDE, BUT NOT BE LIMITED TO, CAPITAL)
EXPENDITURES FOR EQUIPMENT AND)
FACILITIES; CONSTRUCTION OR PURCHASE OF)
AN ELECTRIC GENERATING FACILITY OR ENTER)
INTO A LONG-TERM PURCHASE POWER)
CONTRACT (AND POSSIBLE EARNING ON THE)
CONTRACT); CHANGE IN DEPRECIATION RATES)
AND/OR ESTABLISHMENT AND RECOVERY OF A)
REGULATORY ASSET; AND FOR SUCH OTHER)
RELIEF AS THE COMMISSION DEEMS PSO IS)
ENTITLED.)

CAUSE No. PUD 201200054

FILED
SEP 26 2012

COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

DIRECT TESTIMONY OF

HOWARD L. GROUND

ON BEHALF OF

PUBLIC SERVICE COMPANY OF OKLAHOMA

SEPTEMBER 26, 2012

DIRECT TESTIMONY

CAUSE No. PUD 201200054
HOWARD L. GROUND

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EXHIBITS

EXHIBIT HLG-1	THE TERM SHEET FOR THE SETTLEMENT AGREEMENT
EXHIBIT HLG-2	LETTER FROM EPA RECOGNIZING COMPREHENSIVE APPROACH
EXHIBIT HLG-3	SEPTEMBER 10, 2012, LETTER FROM ODEQ EXECUTIVE DIRECTOR STEVE THOMPSON TO MR. STUART SOLOMON GRANTING A ONE YEAR EXTENSION FOR MATS
EXHIBIT HLG-4	MARCH 29, 2011, LETTER FROM SECRETARY MING AND SECRETARY SHEERER TO MR. STUART SOLOMON
EXHIBIT HLG-5	SEPTEMBER 30, 2011, LETTER FROM ATTORNEY GENERAL PRUITT TO MR. STUART SOLOMON

I. INTRODUCTION AND QUALIFICATIONS

Q. WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS ADDRESS?

A. My name is Howard L. Ground, and my business address is 1601 Northwest Expressway, Suite 1400, Oklahoma City, Oklahoma 73118.

Q. WHO IS YOUR EMPLOYER, AND IN WHAT CAPACITY ARE YOU EMPLOYED?

A. My employer is Public Service Company of Oklahoma (PSO or Company), and I am Manager - State Governmental and Environmental Affairs. PSO is an operating company subsidiary of American Electric Power Company, Inc. (AEP).

Q. WOULD YOU PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?

A. I earned a Bachelor of Science degree in Mechanical Engineering Technology from Oklahoma State University in 1980 and a master in Business Administration with Honors from Oklahoma City University in 1992. I have attended Executive Management programs at Penn State University and The Ohio State University.

I joined PSO, a wholly owned subsidiary of Central and South West Corporation (CSW), in January 1981 as a performance engineer in the central engineering office. I was transferred a short time later to Riverside Station, a 960 MW gas fired power plant as a Results Engineer with the responsibilities of performance testing, operational and efficiency enhancements, engineering analysis of equipment operations as well as plant upgrades and environmental reporting. I became the supervisor over the engineering department and laboratory at the plant in 1982 and expanded my responsibilities to include all engineering activities as well as federal energy reporting and plant budgeting

1 and administrative responsibilities. In 1989 I transferred into the corporate
2 Environmental department as a senior engineer where I had responsibilities for
3 environmental compliance activities in air, water, and solid waste at all PSO facilities. I
4 became Manager of Environmental and Occupational Health Department in 1992 which
5 also included supervising the corporate laboratory. In that position I was responsible for
6 policy, procedures, training, reporting, compliance planning, regulatory and legislative
7 interface for all environmental and occupational health issues at PSO.

8 I transferred to the CSW corporate environmental office in Dallas as Manager,
9 Air Quality Services in 1998 with the responsibility of policy, procedures, reporting,
10 regulatory compliance strategies, regulatory and legislative liaison and internal consulting
11 services on air quality issues for over 100 CSW generating plants. I was the alternative
12 designated representative (ADR) for CSW power plants where I was responsible for the
13 accounting of all emissions and disposition of emission allowances. I maintained that
14 position and responsibilities until the merger of CSW and AEP in June 2000. I continued
15 to manage the Air Quality Services department after the merger but transferred the ADR
16 responsibility to the Columbus corporate office. I continued in that role until March 2004
17 when I transferred to PSO as the Manager, State Environmental Affairs where I was
18 responsible for environmental legislation and regulatory issues as well as sustainability
19 and wildlife issues. I took on the Governmental Affairs responsibilities along with my
20 Environmental Affairs responsibilities in October 2007 and continue in that role today.

1 **Q. WHAT ARE YOUR RESPONSIBILITIES AS MANAGER - STATE**
2 **GOVERNMENTAL AND ENVIRONMENTAL AFFAIRS?**

3 A. I am PSO's primary contact and representative on issues before the state legislature,
4 certain industry and trade associations, and public advocacy groups. I am also the
5 Company's primary representative before the state environmental regulatory agency, the
6 Oklahoma Department of Environmental Quality (ODEQ). I also assist with
7 representation before the United States Environmental Protection Agency (EPA).

8 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY AS A WITNESS BEFORE ANY**
9 **REGULATORY COMMISSION?**

10 A. Yes, I have testified before environmental regulatory councils and commissions in
11 Oklahoma and Texas. I have also submitted Direct Testimony in Texas PUC Docket No.
12 27207, AEP Texas Central Company's Application for approval of environmental
13 cleanup costs.

14 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

15 A. Yes. I am sponsoring the following five exhibits.

16 Exhibit HLG – 1 The Term Sheet for the Settlement Agreement

17 Exhibit HLG – 2 Letter from EPA recognizing comprehensive approach.

18 Exhibit HLG – 3 September 10, 2012, letter from ODEQ Executive Director Steve
19 Thompson to Mr. Stuart Solomon granting one year MATS
20 Extension

21 Exhibit HLG – 4 March 29, 2011, Letter from Secretary Ming and Secretary Sheerer
22 to Mr. Stuart Solomon

1 Exhibit HLG – 5 September 30, 2011, Letter from Attorney General Pruitt to Mr.
2 Stuart Solomon

II. PURPOSE AND SUMMARY

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

4 A. I describe current environmental rules that require the installation of emissions control
5 equipment at PSO's power generating facilities. I will also review potential future
6 environmental requirements that also could impact PSO's generation fleet. Finally, I will
7 describe the principal terms for an agreement with the State of Oklahoma and EPA to
8 resolve pending litigation over the regional haze program requirements for PSO's
9 generating units and the obligations related to that agreement.

10 **Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

11 A. There are two main current EPA rules requiring PSO to install control equipment to meet
12 emission limits in specific time frames: (1) the Regional Haze Rule (RHR) and (2) the
13 Mercury and Air Toxics Standard (MATS) rule. These rules were finalized on December
14 28, 2011, and February 16, 2012, respectively. These rules will require PSO to make
15 substantial reductions in emissions of sulfur dioxide (SO₂), nitrogen oxide (NO_x),
16 mercury, acid gases, and particulate matter.

17 PSO also faces the prospect of additional costly requirements in the future for its
18 generation fleet, particularly its coal fleet. Over the next five to ten years, PSO will also
19 likely have to address requirements under: (1) the successor to the Cross State Air
20 Pollution Rule (CSAPR), (2) the Coal Combustion Residuals (CCR) Rule, (3) the Clean
21 Water Act (316(b)) Rule, (4) possible carbon dioxide limitations and other greenhouse
22 gas (GHG) regulations, (5) implementation obligations under the One-hour SO₂ and NO_x

1 Primary National Ambient Air Quality Standards (NAAQS), (6) future revisions of the
2 ozone and particulate matter NAAQS, and (7) a second planning period under the RHR.

3 In particular, the current and future regulations will have a profound impact at the
4 coal-fired Northeastern Units 3 and 4. These units represent approximately one-fourth of
5 PSO's total capacity requirement and an even greater percentage of its base load energy
6 resources. The environmental requirements threaten PSO's ability to continue to operate
7 these plants and meet its customers' electricity needs and assure reliability. Given these
8 current and future environmental obligations, PSO has looked for opportunities to
9 provide some near-term certainty around its air emission obligations for the coal-fired
10 Northeastern Units 3 and 4 under the RHR and MATS rules. To meet this desire, PSO
11 executed a term sheet for a Settlement Agreement (Agreement or Regional Haze
12 Agreement (RHA)) with the EPA, the State of Oklahoma, and the Oklahoma Department
13 of Environmental Quality (ODEQ) to resolve PSO's emission control requirements for
14 Northeastern Units 3 and 4 and to ensure sufficient resources to meet our customer's
15 demands. That term sheet (See Exhibit HLG – 1) stipulates for PSO a reasonable,
16 orderly, and definitive time line to comply with its coal plant emissions limit
17 requirements. The term sheet recognizes PSO's desire for the RHA to be a
18 comprehensive compliance strategy (See Exhibit HLG – 2). The term sheet also provides
19 PSO with greater flexibility in responding to the future requirements of other
20 environmental rules.

21 More specifically, the term sheet prescribes emission limits for
22 compliance and requires that PSO install and operate a Dry Sorbent Injection (DSI)
23 system, an Activated Carbon (ACI) system, and a fabric filter (FF) baghouse, and secure

1 further NOx emission reductions on one of the Northeastern units by April 16, 2016.
2 Further, this controlled coal-fired unit at Northeastern will be required to retire no later
3 than December 31, 2026, or by December 31, 2025, if power is available from other
4 resources at a lower projected total cost (including consideration of PSO's need to recover
5 its remaining investment in the units). The unit not selected for the environmental
6 controls will be retired on or before April 16, 2016.

III. OVERVIEW OF CURRENT ENVIRONMENTAL REGULATIONS

7 **Q. WHAT ARE THE FINAL EPA RULES APPLICABLE TO PSO'S GENERATING**
8 **FLEET?**

9 A. The two major final EPA rulemakings that will necessitate the installation of air
10 emissions control equipment are:

11 (1) the Regional Haze Rule (RHR); and

12 (2) the Mercury and Air Toxics Standards Rule (MATS).

A. REGIONAL HAZE RULE

14 **Q. WOULD YOU PLEASE PROVIDE AN OVERVIEW OF THE REGIONAL HAZE**
15 **RULE?**

16 A. The Clean Air Act of 1990 (Title I, Sections 169A and 169B) declared it a national goal
17 to prevent any future, and to remedy any existing, impairment of visibility in 156
18 mandatory federal Class I areas, the impairment of which results from man made
19 pollution. Class I areas are defined as national parks and wilderness areas that Congress
20 has recognized as significant sites. In 1999, the EPA issued the RHR for the protection
21 of visibility in Class I National Parks and Wilderness Areas.

1 Under the RHR, states are required to set periodic goals for improving visibility in
2 the 156 Federal Class I areas. The RHR applies to 26 industrial sectors that are major
3 sources of SO₂, NO_x, and traditional, primary particulate matter (PM) emissions, and that
4 were in existence or under construction between 1962 and 1977. Electric generating
5 units (EGUs) are included in the category of major sources governed by the RHR that are
6 required to install Best Available Retrofit Technology (BART) to reduce their visibility
7 impacts.

8 The RHR requires the states to develop regional haze state implementation plans
9 (Regional Haze SIP) that contain enforceable measures and strategies for reducing
10 emission of pollutants associated with visibility impairment. Each SIP must require
11 certain eligible facilities (subject-to-BART sources) to achieve specified emission
12 limitations, known as BART, including NO_x, SO₂ and PM, emission limits necessary to
13 improve visibility. BART is applicable to EGUs greater than 250 megawatt (MW) that
14 have been determined to have significantly impaired visibility in one or more federal
15 Class I areas.

16 On July 6, 2005, the EPA published the final "Regional Haze Regulations and
17 Guidelines for Best Available Retrofit Technology Determinations." The Federal Clean
18 Air Act and the Regional Haze Rule require certain states, including Oklahoma, to make
19 reasonable progress toward the "prevention of any future, and the remedying of any
20 existing, impairment of visibility" in mandatory Class I Federal areas. Moreover, the
21 Regional Haze Rule requires the State of Oklahoma to develop programs to "address
22 regional haze in each mandatory Class I Federal area located within the State and in each
23 mandatory Class I Federal area located outside the State which may be affected by

1 emissions from within the State.” Air pollutants emitted by BART eligible sources in
2 Oklahoma, which may reasonably be anticipated to cause or contribute to visibility
3 impairment, in any mandatory Class I Federal area are NO_x, SO₂, PM-10, and PM-2.5.
4 EPA also provided guidance on what level of control is reasonable for certain BART-
5 eligible sources, including EGUs, and published “presumptive BART” emission rates for
6 SO₂ and NO_x based on the types of cost-effective controls available.

7 Oklahoma, on February 18, 2010, through the Secretary of Environment,
8 submitted to EPA its regional haze revisions to the Oklahoma State Implementation Plan
9 (“SIP”). After conducting dispersion modeling and properly balancing the five statutory
10 factors¹ relevant to a BART determination, it was determined that six PSO electric
11 generating units may cause or contribute to visibility impairment at a Class I Federal
12 Area and, therefore, are subject to the BART requirement of the Federal Regional Haze
13 Rule. This requirement mandates that these six generating units control the emissions of
14 visibility impairing pollutants.

15 **Q. HOW DID OKLAHOMA DETERMINE THE APPROPRIATE LEVEL OF NO_x**
16 **AND SO₂ CONTROL FOR THE PSO BART ELIGIBLE SOURCES?**

17 **A.** In general, BART is determined for each eligible emissions unit using the following five
18 steps from the BART Guidelines:

- 19 (1) identify all available retrofit control technologies;
20 (2) eliminate technically infeasible options;
21 (3) evaluate control effectiveness of remaining control technologies;

¹ The five BART factors are: (1) the costs of compliance; (2) the energy and nonair quality environmental impacts of compliance; (3) any existing air pollution control technology in use at the source; (4) the remaining useful life of the source; and (5) the degree of improvement in visibility which may reasonably be anticipated to result from the use of the technology.

1 (4) evaluate impacts and document the results; and

2 (5) evaluate visibility impacts.

3 The BART Guidelines require the consideration of all “control technologies with
4 a practical potential for application to the emissions unit and the regulated pollutant under
5 evaluation.” PSO evaluated various retrofit control technologies against the five factor
6 analysis. AEP developed compliance costs associated with implementing the evaluated
7 control systems and estimated both annual operating costs and annualized capital costs
8 associated with retrofit construction. The best control technology that was also cost
9 effective was chosen as BART for Northeastern Units 3 and 4.

10 **Q. WHAT ARE THE PRESUMPTIVE BART LIMITS FOR PSO’S GENERATING**
11 **UNITS?**

12 **A.** The presumptive limits applicable to PSO’s coal units are:

- 13 1. 0.15 pounds NO_x per million Btu of heat input (0.23 lb/MMBtu) on a 30-day
14 rolling average; and
15 2. 0.15 pounds SO₂ per million Btu of heat input (0.15 lb/MMBtu) on a 30-day
16 rolling average.

17 There are no presumptive limits for the gas units.

18 **Q. DID PSO’S ANALYSIS CONFIRM THAT LOW NOX BURNER**
19 **TECHNOLOGIES ARE COST-EFFECTIVE AND REASONABLE FOR PSO’S**
20 **UNITS?**

21 **A.** Yes. In the BART determination guidelines for NO_x, the EPA calculated that for all
22 types of boilers, other than cyclone boilers, combustion control technology (represented

1 by low NO_x burner technologies (LNB) and separated over-fire air (SOFA) in some cases
2 is generally more cost-effective than post-combustion controls (represented by selective
3 non-catalytic reduction (SNCR) and selective catalytic reduction (SCR)). PSO's analysis
4 confirmed that this is accurate for PSO's generating units.

5 **Q. WHAT WILL PSO'S GENERATING UNITS NEED TO INSTALL TO MEET**
6 **THE NO_x LIMITS OF THE RHR?**

7 A. PSO will install a combination of low NO_x burners and SOFA combustion modifications
8 on Northeastern Units 2, Southwestern Unit 3, and Comanche Units 1G1 and 1G2.
9 Northeastern Units 3 and 4 had SOFA installed this year.

10 **Q. DID PSO'S ANALYSIS CONFIRM THAT THE PRESUMPTIVE BART LIMITS**
11 **FOR SO₂ ARE COST-EFFECTIVE AND REASONABLE FOR PSO'S COAL**
12 **UNITS?**

13 No, it did not. In the BART determination analysis for SO₂, PSO submitted a five-factor
14 analysis which demonstrated that installation of a dry flue gas desulfurization system
15 (DFGD) to achieve a presumptive BART limit of 0.15 lb SO₂/MMBtu at Northeastern
16 Units 3 and 4 is not cost-effective, based on the range of values set forth in the RHR.
17 PSO further evaluated the basis of the annual average SO₂ rate that was used in the five-
18 factor analysis and determined that the appropriate historical SO₂ emission rate is
19 approximately 0.55 lb SO₂/MMBtu. This determination was based on an EPA July 5,
20 2005, guidance document which stated: "The baseline emissions rate should represent a
21 realistic depiction of anticipated annual emissions for the source. In general, for existing
22 sources subject to BART, you will estimate the anticipated annual emissions based upon
23 actual emissions from a baseline period." The cost-effectiveness calculation for the

1 installation of a DFGD, based upon the 0.55 lb SO₂/MMBtu historic emission rate, is
2 \$6,077 per ton, far in excess of the range of cost-effectiveness for SO₂ controls that EPA
3 determined was reasonable in its RHR guidance.

4 **Q. WHAT DID ODEQ DO IN RESPONSE TO PSO'S DETERMINATION THAT**
5 **INSTALLATION OF A DFGD WAS NOT COST-EFFECTIVE TO ACHIEVE**
6 **THE PRESUMPTIVE SO₂ LIMIT?**

7 Based on the fact that installation of a DFGD was not cost effective, the ODEQ
8 determined that continued use of low sulfur coal would satisfy the requirements of the
9 RHR. The SIP also established an alternative that would have allowed PSO the
10 flexibility to install scrubbers to remove SO₂ on all coal-fired units or achieve equivalent
11 emissions (including the option of switching from coal to natural gas) by 2018 in the
12 event that the EPA disapproved of the low-sulfur coal BART determination. The SIP
13 further provided that these sources could elect to install SO₂ scrubbers on half of the coal-
14 fired sources and switch the other half to natural gas (or achieve equivalent reductions)
15 by 2026.

16 **Q. WHAT IS THE CURRENT STATUS OF THE OKLAHOMA SIP?**

17 A. The EPA published its proposed partial approval and disapproval of the Oklahoma
18 Regional Haze SIP and Federal Implementation Plan (FIP) for Interstate Transport of
19 Pollution Affecting Visibility and BART Determinations in the Federal Register on
20 March 22, 2011.

21 PSO supported EPA's partial approval of the NO_x and PM portions of the
22 Oklahoma SIP as submitted. However, PSO disagreed with EPA's proposed partial
23 disapproval of the portions of the Oklahoma SIP that addressed SO₂, and the FIP

1 determinations made by EPA for PSO's Northeastern Units 3 and 4. The partial approval
2 and partial disapproval of the Oklahoma SIP and the issuance of the FIP was finalized by
3 the EPA on December 28, 2011, and became effective on January 27, 2012. The FIP
4 gives PSO five years to be in compliance with the requirements.

5 **Q. WHAT ACTIONS HAVE BEEN TAKEN TO CHALLENGE EPA'S**
6 **DISAPPROVAL OF THE OKLAHOMA SIP AND THE ISSUANCE OF THE FIP?**

7 On March 23, 2011, the Oklahoma Attorney General filed a Notice of Intent to sue the
8 EPA over the proposed Regional Haze FIP. The suit was filed on June 1, 2011, in federal
9 district court. On August 2, 2011, PSO filed a motion to intervene in the Attorney
10 General's lawsuit. This suit was dismissed as moot after EPA issued its final rule
11 disapproving the Oklahoma SIP.

12 On February 24, 2012, PSO filed a Petition For Review of the final Regional
13 Haze FIP in the Tenth Circuit Court of Appeals. The State of Oklahoma, EPA, and PSO
14 engaged in settlement discussions after the petition was filed, and have reached
15 agreement on the principal terms of a settlement. The briefing schedule has been
16 extended at the request of the parties while a final agreement is negotiated.

17 Oklahoma Gas & Electric Company (OG&E) filed a separate suit challenging the
18 EPA's SO₂ BART determinations for OG&E's coal units. On June 22, 2012, the Tenth
19 Circuit issued a stay of the SO₂ requirements for OG&E's units until the court reaches a
20 final decision on the merits of OG&E's appeal. Although the stay may briefly extend the
21 time for OG&E to make further SO₂ emission reductions, even if OG&E is ultimately
22 successful on the merits of its suit, OG&E's units will likely have some additional SO₂
23 emission reduction obligations under the Regional Haze Rule in 2017-2018. Regardless

1 of the outcome of OG&E's suit, the certainty provided by the Agreement with the State
2 and EPA will provide benefits for PSO's customers, the Company, and the environment.

3 **Q. WHAT ARE THE SO₂ EMISSION LIMITATIONS FOR NORTHEASTERN**
4 **UNITS 3 AND 4 IN THE REGIONAL HAZE FIP?**

5 A. The Regional Haze FIP imposes an emission rate of 0.06 lb SO₂/MMBtu on emissions
6 from Northeastern 3 and 4 within five years, which is considerably lower than the
7 presumptive limits of 0.15 lb SO₂/MMBtu in the RHR. Northeastern Units 3 and 4
8 would have to be retrofitted with a DFGD to meet the prescribed SO₂ limits.

9 **B. MATS RULE**

10 **Q. WOULD YOU PLEASE GENERALLY DESCRIBE THE MATS RULE?**

11 A. The MATS Rule replaces the former Clean Air Mercury Rule (CAMR) which the D.C.
12 Circuit Court of Appeals vacated in 2008. Administrator Jackson signed the final MATS
13 Rule on December 16, 2011, and was published in the *Federal Register* on February 16,
14 2012. This rule regulates emissions of hazardous air pollutants (HAPs) from coal and
15 oil-fired electric generating units. HAPs regulated by this rule are: (1) mercury; (2)
16 several non-mercury metals such as arsenic, lead, cadmium, and selenium, which are
17 regulated as particulate matter; (3) various acid gases, including hydrochloric acid; and
18 (4) many organic HAPs.

19 The MATS Rule includes specific and stringent emission rate limits for mercury,
20 particulate matter (as a surrogate for the non-mercury particulate HAPs), and
21 hydrochloric acid or SO₂ (as a surrogate for acid gases), or requires emission testing to
22 demonstrate that individual HAP emission rates are met. The rule also creates work
23 practice standards for organic HAPs.

1 **Q. WHAT HAP EMISSION LIMITS MUST NORTHEASTERN UNITS 3 AND 4**
2 **MEET TO COMPLY WITH MATS?**

3 A. The HAP emission limits applicable to Northeastern Units 3 and 4 are shown in the table
4 below.

HAP	Emission Limit
Mercury	1.2 lb/Tbtu
Non-mercury metals*	0.03 lb/MMBtu Filterable PM
Acid Gases**	.002 lb/MMBtu HCl
Organic HAP Compounds	Work Practice Standards

* Antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, nickel, selenium

** Hydrogen fluoride (HF), Chlorine (Cl₂), hydrogen cyanide (HCN), HCl

5 **Q. WHAT COMPLIANCE TIMELINES ARE INCLUDED IN THE MATS RULE?**

6 A. The Clean Air Act (CAA) includes a three-year compliance period, which results in a
7 compliance deadline of April 16, 2015, for MATS. There is a provision for a one-year
8 extension upon approval of the permitting authority, which would allow until April 16,
9 2016, for certain units, at the discretion of the ODEQ.

10 **Q. WHAT ASSURANCE DOES PSO HAVE THAT A ONE YEAR EXTENSION**
11 **WILL BE AVAILABLE?**

12 A. PSO has discussed the extension with the ODEQ and on August 2, 2012, sent a letter
13 requesting the extension. PSO received a letter from the ODEQ dated September 10,
14 2012, granting the one year extension. The letter is provided in Exhibit HLG – 3.

1 **Q. WHAT ARE THE TECHNOLOGIES THAT WILL BE EMPLOYED TO**
2 **ACHIEVE THE MATS RULE EMISSIONS LIMITS AT NORTHEASTERN**
3 **UNITS 3 AND 4?**

4 A. There are a number of alternative technologies capable of satisfying the MATS limits.
5 PSO has chosen technologies that enable it to comprehensively comply with the
6 requirements of the RHR and MATS, while preserving its flexibility to address future
7 environmental requirements cost-effectively. Northeastern Unit 3 will be equipped with
8 DSI, a FF bag house, and ACI to comply with the emission limits required by the MATS
9 Rule.

10 **C. CURRENT RULES SUMMARY**

11 **Q. ABSENT THE TERM SHEET FOR THE RHA, WHAT EMISSION CONTROL**
12 **TECHNOLOGY WOULD HAVE TO BE INSTALLED AT NORTHEASTERN**
13 **BASED ON THE CURRENT REGULATORY PARADIGM SUMMARIZED**
14 **ABOVE IN YOUR TESTIMONY?**

15 A. Northeastern Units 3 and 4 would have to meet much more stringent and costly emission
16 control limits with more efficient emission control technology than those specified in the
17 term sheet. The table below summarizes the environmental controls most likely to have
18 to be installed as a result of the current regulatory framework.

Rule	Compliance Timeline	Northeastern Units 3&4 Environmental Controls
Regional Haze Rule	Became effective on January 27, 2012; 5 year compliance deadline	Dry Flue Gas Desulfurization (DFGD) Low NO _x Burners/Over fire Air (LNB/OFA)
MATS Rule	April 16, 2015; likely 1 year extension for major retrofits to early 2016	Dry Sorbent Injection (DSI) Activated Carbon Injection System (ACI) Improved Particulate Controls

1 **IV. OVERVIEW OF FUTURE ENVIRONMENTAL REGULATIONS**

2 **Q. DO OTHER ENVIRONMENTAL REGULATIONS EXIST THAT MAY**
3 **REQUIRE ADDITIONAL ENVIRONMENTAL INVESTMENTS OR**
4 **OPERATIONAL CHANGES AT NORTHEASTERN UNITS 3 AND 4 IN THE**
5 **FUTURE?**

6 **A.** Yes, the following proposed and emerging federal and state rulemaking requirements
7 could require additional investments or operational changes at Northeastern Station:

8 **1. Cross State Air Pollution Rule (CSAPR)** – The CSAPR was finalized by the
9 EPA on July 6, 2011, and it serves as the replacement for the former Clean Air
10 Interstate Rule (CAIR). CSAPR, as currently written, affects 28 eastern,
11 southern, and mid-western states, as well as the District of Columbia. This final
12 rule defines state obligations to reduce emissions of NO_x and SO₂ that, according
13 to the EPA, significantly contribute to another state's fine particulate (PM 2.5)
14 and ozone nonattainment and maintenance areas. On December 15, 2011,
15 Oklahoma was one of the six additional states included in the final Supplemental
16 Transport Rule which would have required PSO to reduce NO_x emissions during
17 the ozone season (May through September).

18 CSAPR was set to take effect beginning on January 1, 2012, but the D.C.
19 Circuit Court of Appeals issued an order staying implementation on December 30,
20 2011. Initially, the stay did not expressly cover the states included in the
21 Supplemental Transport Rule, so PSO filed a petition for Administrative
22 Reconsideration and Stay of the Supplemental Transport Rule. A petition for
23 judicial review of the Supplemental Transport Rule also was filed. EPA

1 announced on February 6, 2012, that because there is no practical way for covered
2 sources to comply while CSAPR is subject to the D.C. Circuit's stay order, EPA
3 does not expect covered sources to comply with the Supplemental Transport Rule
4 while the D.C. Circuit stay remains in effect. On February 12, 2012, and June 12,
5 2012, the EPA finalized revisions to CSAPR that made technical adjustments to
6 the emissions budgets in certain states and delayed the implementation of
7 restrictions on interstate emissions trading until Phase II of the program. On
8 August 21, 2012, the D.C. Circuit issued an opinion vacating CSAPR, but the
9 final order is being withheld pending requests for rehearing. Until the final
10 judgment is rendered, the stay on CSAPR remains in effect.

11 **2. Coal Combustion Residuals (CCR) Rule** – The EPA published proposed CCR
12 rule in June 2010. The CCR Rule establishes standards for the management and
13 disposal of byproducts of coal combustion in power plants (coal ash, etc.). As
14 proposed, the CCR Rule contained three primary options, including one program
15 to regulate CCRs as hazardous wastes, and two options to regulate CCRs as non-
16 hazardous solid wastes. The CCR rule could, when finalized, require the
17 conversion of wet ash disposal systems to dry landfill systems, the possible
18 relining or closing of ash ponds, as well as the possible construction of waste
19 water treatment facilities. Approximately 40 percent of CCRs are currently
20 beneficially re-used as substitutes for aggregates, abrasives, and other native
21 materials, so regulation of these materials as hazardous wastes could have
22 significant impacts on disposal costs. EPA has announced its intention to

1 undertake a risk assessment of beneficial uses of CCRs, and there is pending
2 litigation that could result in a firm deadline for issuing a final CCR Rule.

3 **3. Clean Water Act “316(b)” Rule** – The EPA published the proposed 316(b) rule
4 on April 20, 2011, which establishes technology standards for the design and
5 operation of cooling water intake structures at existing electric generating
6 facilities to lessen their impacts on aquatic organisms. The proposed rule requires
7 a site-specific study of measures to avoid entrainment with a goal of achieving 90
8 percent of the reductions that could be achieved through the use of a closed-cycle
9 cooling system. A final rule is expected in July of 2013. The implementation
10 schedule for this rule could extend late into this decade due to the site-specific
11 nature of the permitting process.

12 **4. Carbon Dioxide (CO₂) and Greenhouse Gas (GHG) Emission Regulation** –
13 For many years, Congress has considered, but failed to enact, comprehensive
14 legislation to address greenhouse gases. EPA issued an endangerment finding and
15 rules regulating GHG emissions from new motor vehicles in 2009, which
16 triggered regulation of GHG emissions from new and modified major stationary
17 sources under the preconstruction permitting program in the Clean Air Act. EPA
18 also issued a Tailoring Rule to phase in regulation of new and modified stationary
19 sources of GHGs under the Clean Air Act. These rules were challenged in the
20 D.C. Circuit Court of Appeals, which issued a decision in June of 2012 upholding
21 EPA’s rules. PSO would only be subject to these rules if it modified its existing
22 sources in a way that increased GHG emissions above the thresholds in the
23 Tailoring Rule, or built a new major source of GHG emissions.

1 On April 13, 2012, EPA proposed New Source Performance Standards
2 (NSPS) for GHG emissions from new fossil-fueled generation, including natural
3 gas combined cycle units. The proposal establishes a CO₂ emission limit of 1,000
4 lb/MWh, a standard EPA believes could be met by most new natural gas
5 combined cycle units. Any new coal plant would need some form of carbon
6 capture technology to meet the proposed limit, although EPA acknowledges that
7 such technology is not currently cost-effective. The proposal does not apply to
8 existing units, or simple cycle natural-gas units. Comments were submitted in
9 June of 2012. The planned modifications under the RHA at Northeastern and
10 PSO's other generating units will not make the new source NSPS for GHG
11 applicable to these units.

12 EPA had previously agreed to develop a NSPS program for existing fossil-
13 fired power plants, but currently states it has no plans to issue a proposed rule for
14 existing sources. Given that there are currently no cost-effective post-combustion
15 control technologies available, the standards are anticipated to focus on energy
16 efficiency opportunities, but the substantive requirements of any future EPA
17 proposal, and their applicability to Northeastern Station, are not yet known.

18 **5. The new one-hour SO₂ and NO₂ Primary National Ambient Air Quality**
19 **Standards (NAAQS)** – In 2010 the EPA revised the NAAQS for SO₂ and NO₂,
20 establishing new one-hour standards that are significantly more stringent than the
21 prior standards. All areas in Oklahoma have been designated “unclassifiable/
22 attainment” for the one-hour NO₂ standard because no monitors measured values
23 in excess of the new standard. EPA proposed to require states to use computer

1 modeling to determine whether violations of the new 1-hour SO₂ standard might
2 occur, but several states, including Oklahoma, have objected to this process. EPA
3 has delayed the designations process to provide further opportunities for
4 engagement on this issue (and others). Designations for whether an area is in
5 attainment with the new SO₂ standard are expected from the EPA in mid-2013.

6 States must submit SIPs to the EPA for areas designated as being in
7 attainment or unclassifiable by June 2013 and must submit SIPs for those areas
8 designated as nonattainment by February 2014. These SIPs must provide details
9 on the SO₂ emissions reductions, if any, necessary to either keep an area in
10 attainment or bring an area currently out of attainment back into attainment.

11 States must demonstrate that all areas will be in attainment with the new one-hour
12 SO₂ standard no later than August 2017. While it is uncertain at this point
13 whether Northeastern Station will be required by the Oklahoma SIP to reduce SO₂
14 emissions from its current permitted emission limit, it is possible that some level
15 of reductions will be needed to demonstrate attainment of the one-hour standard.

16 **6. Future revised NAAQS for PM and Ozone** – EPA proposed a revised standard
17 for fine particulate matter on June 26, 2012, that would tighten the annual
18 standard from 15 µg/m³ to 12-13 µg/m³, retain the current 24-hour standard, and
19 establish a new visibility protection standard for urban areas. Comments on the
20 proposed standard are due August 31, 2012, and a final rule is expected to be
21 issued by December 14, 2012. SO₂ and NO_x are precursors of fine particulate
22 matter. Until the level of the final standard is known, it is uncertain whether

1 further emission reductions will be required from PSO's units as a result of this
2 rule.

3 EPA is also in the process of developing a revised standard for ozone,
4 which is expected to be lower than the current standard. NO_x is an ozone
5 precursor. Until the level of the final standard is known, it is uncertain whether
6 further emission reductions will be required from PSO's units as a result of this
7 rule.

8 **7. Second planning period under RHR** – The RHR provides for several planning
9 periods prior to the 2064 deadline for achieving the national goal of natural
10 visibility conditions in Class I Federal areas. States are required to develop a SIP
11 for each planning period. The second planning period commences in 2019. It is
12 anticipated that, during the second planning period, additional reductions of
13 emissions affecting visibility may be required, or reductions may be required from
14 additional sources, beyond those regulated in the first planning period.

15 **V. SETTLEMENT AGREEMENT**

16 **Q. WAS PSO ENCOURAGED TO EXPLORE SETTLEMENT OF ITS**
17 **CHALLENGE TO THE RH FIP?**

18 **A.** Yes. After the proposed RH FIP was issued, the Attorney General invited a group of
19 stakeholders to discuss the proposed FIP, roles of various entities, developing comments
20 on the proposed FIP and potential litigation (See Exhibit HLG – 4). The AG expressed
21 his opinion that the state should also have a parallel path to negotiate a resolution with the
22 EPA.

1 As a follow-up to the March 11th meeting, Secretaries Ming and Sherrer
2 requested, through a letter dated March 29, 2011 (See Exhibit HLG – 5), that PSO
3 participate with state officials and others to develop a “Statewide Plan” to address all of
4 the federal requirements affecting electric generating units with the ODEQ being the
5 coordinator. PSO believed that the state would be able to negotiate a better outcome than
6 the proposed FIP and accepted this invitation.

7 A meeting was held on April 5, 2011, at the ODEQ offices to initiate that process.
8 Secretary Sherrer started that meeting by stating that the Governor, as well as Secretary
9 Ming and himself felt that Oklahoma should make an attempt to negotiate with EPA in
10 good faith to gain a better outcome than the proposed FIP. PSO worked with the ODEQ
11 on a Statewide Plan while also working with the AG’s office and the OCC and other
12 major stakeholders to coordinate comments on the proposed FIP as well as participating
13 in the OCC technical conferences on current and potential federal regulations impacting
14 Oklahoma utilities.

15 After the FIP was finalized and PSO filed its petition challenging the FIP, the
16 parties continued their discussions and were ultimately successful in reaching agreement
17 on a term sheet that confirms PSO’s comprehensive compliance strategy for the RHR and
18 MATS.

19 **Q. WOULD YOU PLEASE GENERALLY DESCRIBE THE PRINCIPAL TERMS**
20 **OF THE EXECUTED TERM SHEET NEGOTIATED BETWEEN THE EPA, THE**
21 **STATE OF OKLAHOMA, THE ODEQ, AND PSO?**

22 **A.** The principal terms of the of the executed term sheet (Exhibit HLG – 1) negotiated by the
23 parties specifies the emission rates, timelines, and control equipment necessary to

1 comprehensively address PSO's compliance obligations under the RHR and the MATS
2 rule at Northeastern Units 3 and 4.

3 The term sheet stipulates that the Settlement Agreement will result in a revised
4 BART determination for Northeastern Units 3 and 4 that is adopted as a revision to the
5 Oklahoma SIP that includes a RHA entered into by PSO and ODEQ. The RHA requires
6 that by no later than December 31, 2013, PSO will complete installation of low-NO_x
7 combustion technologies and achieve a NO_x emission rate of 0.23 lb/MMBtu on a 30-day
8 rolling average individually at both Northeastern Units 3 and 4. The RHA also requires
9 that beginning on January 31, 2014, PSO will comply with a new SO₂ emission rate at
10 Northeastern Units 3 and 4 of 0.65 lb/MMBtu on a 30-day rolling average, and with a
11 new SO₂ emission rate of 0.60 lb/MMBtu on a 12-month rolling average at these units.
12 PSO has to maintain these emission rates until controls are installed at either
13 Northeastern Unit 3 or 4, and the uncontrolled unit is retired; both of these actions must
14 occur on or before April 16, 2016.

15 **Q. ARE THERE ANY EXCEPTIONS TO COMPLYING WITH THE SO₂ EMISSION**
16 **RATES?**

17 **A.** Yes. The SIP will include an alternative operating scenario so that if the coal supplies
18 necessary to achieve the emission rates prescribed in the term sheet are not available
19 during any future period when the above SO₂ emission rates are in effect, PSO will be
20 subject to equivalent mass emission limitations on a 30-day average basis and a 12-month
21 average basis, along with reporting requirements to both the ODEQ and EPA.

1 **Q. HAS THE FINAL SETTLEMENT AGREEMENT BEEN FINALIZED?**

2 A. At this time, the Settlement Agreement has not been finalized but it is in the final stages
3 of approval based on the executed term sheet. PSO will supplement this filing with a
4 copy of the Settlement Agreement once it is final and executed.

5 **Q. HOW WILL THE TERM SHEET AND SUBSEQUENT RHA BE ENFORCED?**

6 A. The EPA will require that the RHA be enforced through a revised Oklahoma BART SIP
7 for Northeastern Units 3 and 4.

8 **Q. CAN YOU PLEASE GENERALLY DESCRIBE THE APPROVAL PROCESS**
9 **FOR THE REVISED OKLAHOMA SIP?**

10 A. After the Settlement Agreement is executed, PSO will provide a revised BART
11 determination to ODEQ with supporting information for Northeastern Units 3 and 4.
12 ODEQ will then develop and adopt a revised Oklahoma SIP. ODEQ will then submit the
13 revised SIP to the EPA to undergo the standard SIP approval process, which includes
14 public notice and comment.

15 **Q. EARLIER YOU MENTIONED INSTALLING CONTROLS AT ONE OF**
16 **NORTHEASTERN'S COAL-FIRED UNITS. WOULD YOU PLEASE**
17 **ELABORATE ON THIS PROVISION OF THE TERM SHEET?**

18 A. Yes. The term sheet requires that PSO install and operate a DSI system, an ACI system,
19 and a FF, along with further NO_x emission reductions at the selected unit by April 16,
20 2016. After installation of these controls, PSO will achieve a 0.15 lb/MMBtu emission
21 rate for NO_x and a 0.40 lb/MMBtu emission rate for SO₂, both on a 30-day rolling
22 average basis.

1 Q. YOU ALSO MENTIONED RETIRING THE UNCONTROLLED UNIT. WHEN
2 DOES THAT HAVE TO OCCUR?

3 A. PSO will need to retire the uncontrolled coal-fired Northeastern unit by April 16, 2016.

4 Q. DOES THE TERM SHEET REQUIRE MONITORING OF THE EMISSION
5 RATES?

6 A. Yes. During the first year of operation of the environmental emission controls, PSO will
7 develop and propose a monitoring program to test various operating profiles and other
8 measures, to determine whether increased SO₂ removal efficiencies can be achieved
9 during normal operations. PSO will submit the monitoring program to EPA and ODEQ
10 for review and implement it during the second and third years of operation of the DSI
11 system.

12 Q. HOW WILL THESE RESULTS OF THE EMISSION RATE MONITORING BE
13 USED?

14 A. PSO will evaluate and report the results of the monitoring program to EPA and ODEQ.
15 If that evaluation shows that the installed technology is capable of sustaining an emission
16 rate of less than 0.37 lb SO₂/MMBtu on a 30-day rolling average without altering the
17 unit's fuel supply, incurring additional capital costs, increasing operating expenses by
18 more than a negligible amount, and/or adversely impacting overall unit operations,
19 ODEQ will propose to revise the emission rate in the RHA by 60 percent of the
20 difference between 0.40 lb SO₂/MMBtu and the demonstrated emission rate. If the
21 demonstrated emission rate is 0.37 lb SO₂/MMBtu or greater, no adjustment will be made
22 to the RHA, and the emission rate for SO₂ from the operating Northeastern coal-fired
23 generating unit in the RHA will remain 0.40 lb SO₂/MMBtu.

1 **Q. DOES THE TERM SHEET RESTRICT THE OPERATION OF THE**
2 **REMAINING NORTHEASTERN UNIT?**

3 A. Yes. Each year, beginning in calendar year 2021, the annual capacity factor for the
4 remaining operating unit at Northeastern (calculated annually based on the percentage of
5 megawatt-hours on a rated capacity of 470 MW times 8,760 hours) will be reduced to no
6 more than 70 percent in calendar years 2021 and 2022; no more than 60 percent in
7 calendar years 2023 and 2024, and no more than 50 percent in calendar years 2025 and
8 2026. Although the Agreement establishes annual capacity factors, it does permit full
9 operations during the summer period as long as annual capacity factors are not exceeded.

10 **Q. DOES THE TERM SHEET RELIEVE PSO OF COMPLYING WITH OTHER**
11 **RULES AND REGULATIONS?**

12 A. No.

13 **Q. WHAT ULTIMATELY BECOMES OF THE UNIT AT NORTHEASTERN THAT**
14 **IS CONTROLLED?**

15 A. The term sheet stipulates that PSO retire the remaining operating and controlled coal-
16 fired generating unit at Northeastern Station no later than December 31, 2026. However,
17 beginning in calendar year 2021, PSO will be required to evaluate whether the projected
18 generation from that unit can be replaced at lower or equal total projected costs from
19 natural gas or renewable resources. Pursuant to the RHA, PSO will provide a copy of the
20 evaluation to EPA and ODEQ. If power is available from such resources at a lower
21 projected total cost (including consideration of PSO's need to recover its remaining
22 investment in the units), then the operating unit will retire no later than December 31,
23 2025.

VI. CONCLUSION

1

2 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

3 **A. Yes, it does.**

Term Sheet
Between the U.S. Environmental Protection Agency,
Public Service Company of Oklahoma, and the State of Oklahoma

The Term Sheet represents a tentative agreement on certain core terms and does not have any binding effect. The core terms of this Term Sheet will only become binding if incorporated into a Settlement Agreement in Public Service Company of Oklahoma (PSO) v. U.S. Environmental Protection Agency (EPA), et al., No. 12-9524, that has all the required terms, receives all the necessary EPA and Department of Justice approvals, and complies with Section 113(g) of the Clean Air Act.

1. PSO will submit to Oklahoma Department of Environmental Quality (ODEQ), and ODEQ will develop and adopt after public notice and hearing, and the Secretary of Environment for the State of Oklahoma will submit to the EPA, a revised Best Achievable Retrofit Technology (BART) determination with supporting administrative and technical information and visibility modeling for PSO's Northeastern Units 3 and 4 that includes the following elements:

- a) ODEQ's SIP revision will include a Regional Haze Agreement (RHA) entered into by ODEQ and PSO to effectuate the BART determination.
- b) The RHA will require that by no later than December 31, 2013, PSO will complete installation of low NOx combustion technologies and achieve a nitrogen oxide ("NOx") emission rate of 0.23 lb/MMBtu on a 30-day rolling average at each of the two coal-fired generating units at PSO's Northeastern Station (Units 3 and 4).
- c) The RHA will require that beginning on January 31, 2014, PSO will comply with a new sulfur dioxide ("SO₂") emission rate at Northeastern Units 3 and 4 of 0.65 lb/MMBtu on a 30-day rolling average, and beginning on December 31, 2014, PSO will comply with a new SO₂ emission rate of 0.60 lb/MMBtu on a 12-month rolling average at Northeastern Units 3 and 4. PSO will maintain those emission rates until controls are installed at one unit as provided in subparagraph e), and the other unit is retired as provided in subparagraph d). The RHA will include an alternative operating scenario that addresses potential disruption of coal supplies during the time period between January 31, 2014 through April 16, 2016.
- d) The RHA will require that PSO seek all necessary regulatory approvals, and will retire one of the coal-fired generating units at Northeastern Station by April 16, 2016.
- e) The RHA will require that PSO seek all necessary regulatory approvals, and install and operate a dry-sorbent injection system, activated carbon injection system, and a fabric filter baghouse, and secure further NOx emission reductions by April 16, 2016 on the coal-fired generating unit at Northeastern Station that will continue to operate. On and after May 16, 2016, PSO will achieve a 0.15 lb/MMBtu emission rate for NOx on a 30-

day rolling average basis, and a 0.40 lb/MMBtu emission rate for SO₂ on a 30-day rolling average basis.

- f) The RHA will require that during the first year of operation of the controls required under the RHA, PSO will develop and propose a monitoring program to test various operating profiles and other measures, to determine whether increased SO₂ removal efficiencies can be achieved during normal operations. Pursuant to the terms of the RHA, PSO will submit the monitoring program to EPA and ODEQ for review and will implement the monitoring program during the second and third years of operation of the DSI system. PSO will evaluate and report the results of the monitoring program to EPA and ODEQ, and if that evaluation demonstrates that the technology is capable of sustainably achieving an emission rate of less than 0.37 lbs/MMBtu on a 30-day rolling average basis without (i) altering the unit's fuel supply, (ii) incurring additional capital costs, (iii) increasing operating expenses by more than a negligible amount, and/or (iv) adversely impacting overall unit operations, ODEQ will propose to revise the emission rate in the RHA by 60 percent of the difference between 0.40 and the demonstrated emission rate. ODEQ will work with PSO to maximize the emission reductions resulting from the implementation of this agreement and the enforceable mechanism outlined in paragraph 3 below will only be implemented by ODEQ in the event that an emission rate of 0.30 lbs/MMBtu is determined to be unachievable under the criteria described above. Upon adoption after notice and opportunity for hearing, the ODEQ will submit the revised RH SIP revision to EPA for approval. If the demonstrated emission rate is 0.37 lbs/MMBtu or greater, no adjustment will be made to the RHA, and the emission rate limitation for SO₂ at the operating Northeastern coal-fired generating unit in the RHA will remain 0.40 lbs/MMBtu.
 - g) The RHA will require that beginning in calendar year 2021, the Annual Capacity Factor (calculated for each calendar year as a percentage of MWH based on a rated capacity of 470 MW times 8760 hours) for the operating coal-fired generating unit at Northeastern Station will be reduced as follows:
 - i. to no more than 70 percent in calendar years 2021 and 2022;
 - ii. to no more than 60 percent in calendar years 2023 and 2024; and
 - iii. to no more than 50 percent in calendar years 2025 and 2026.
 - h) The RHA will require that no later than December 31, 2026, PSO will retire the remaining operating coal-fired generating unit at Northeastern Station. However, in calendar year 2021, the RHA will require PSO to evaluate whether the projected generation from that unit can be replaced at lower or equal total projected costs from natural gas or renewable resources. Pursuant to the RHA, PSO will provide a copy of the evaluation to EPA and ODEQ. If power is available from such resources at a lower projected total cost (including consideration of PSO's need to recover its remaining investment in the units), then the operating unit will retire no later than December 31, 2025.
2. Nothing in the RHA shall relieve PSO from its obligations to comply with all applicable federal, state, and local laws and regulations, including laws, regulations, and compliance

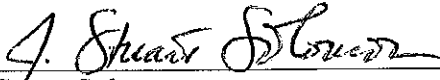
deadlines that become applicable after the date of entry of the RHA. Such laws and regulations include, but are not limited to, the Cross-State Air Pollution Rule and the Mercury and Air Toxics Standards (MATS). Nothing in the revised BART determination for PSO's Northeastern Units 3 and 4 should be construed to provide any relief from the emissions limits or deadlines specified in such regulations, including, but not limited to, deadlines for the installation of pollution controls required by any such regulations.

3. ODEQ also will develop and propose as part of the revised BART determination for PSO, a revision to the Visibility Interstate Transport SIP. This proposed SIP revision will provide an enforceable mechanism that addresses SO₂ reductions from sources other than those operated by PSO, to the extent necessary to achieve the anticipated visibility benefits from the 2018 regional modeling. This proposed SIP revision will be implemented if the SO₂ emission rate for the controlled unit at Northeastern is not reduced to 0.30 lbs/MMBtu or less as a result of the subparagraph f) provision in paragraph 1.
4. Separately from the RH SIP process, EPA and PSO will enter into an agreement under which PSO will report biannually to EPA (beginning in 2017 for the period 2015-2016, and every second year thereafter through the end of 2025 or 2026, whenever the last Northeastern unit is retired) on the energy produced by PSO's units and the sources of energy secured under PSO's long-term purchased power contracts. The initial report will include similar information for calendar years 2013-2014. Requests for proposals (RFPs) for long-term purchase power contracts issued between 2013 and the date the reporting obligation ends will specifically seek bids for energy supplied by natural gas and renewable resources. The biannual reports will include copies of any RFPs issued during the reporting period, and a summary of the capacity or energy secured through any long-term power purchase agreements executed during the reporting period, including the unit(s) providing the purchased power, the amount of capacity or energy secured under the agreement, and the term of each agreement.
5. An EPA letter to ODEQ and PSO dated July 18, 2012 expresses EPA's support of PSO's comprehensive strategy, and notes that the use of the technologies described in the RHA, when properly designed and operated, would be expected to achieve the emission limitations prescribed by the MATS rule issued February 16, 2012 ("MATS letter"). If approved by the appropriate EPA and DOJ officials, the parties will enter into a Settlement Agreement in the matter referenced above, which will refer to the MATS letter in a "whereas" or "recital" clause and the MATS letter will be attached to the Settlement Agreement.

Signature Page for Term Sheet Between the U.S. Environmental Protection Agency, Public Service Company of Oklahoma, and the State of Oklahoma in the matter of *Public Service Company of Oklahoma v. U.S. Environmental Protection Agency, et al.*, No. 12-9524

FOR THE PUBLIC SERVICE COMPANY OF OKLAHOMA:

Dated: 7/19/12



J. Stuart Solomon

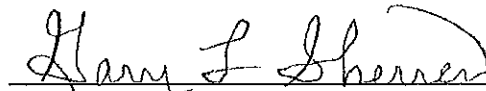
President

Public Service Company of Oklahoma

Signature Page for Term Sheet Between the U.S. Environmental Protection Agency, Public Service Company of Oklahoma, and the State of Oklahoma in the matter of *Public Service Company of Oklahoma v. U.S. Environmental Protection Agency, et al.*, No. 12-9524

FOR THE STATE OF OKLAHOMA:

Dated: 7-18-12

A handwritten signature in cursive script, appearing to read "Gary L. Sherrer", written over a horizontal line.

Gary Sherrer
Secretary of Environment
State of Oklahoma

Signature Page for Term Sheet Between the U.S. Environmental Protection Agency, Public Service Company of Oklahoma, and the State of Oklahoma in the matter of *Public Service Company of Oklahoma v. U.S. Environmental Protection Agency, et al.*, No. 12-9524

FOR THE OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY:

Dated: 7-18-12

A handwritten signature in black ink, appearing to read "Steven A. Thompson", is written over a horizontal line.

Steven A. Thompson


Executive Director

Oklahoma Department of Environmental Quality

Signature Page for Term Sheet Between the U.S. Environmental Protection Agency, Public Service Company of Oklahoma, and the State of Oklahoma in the matter of *Public Service Company of Oklahoma v. U.S. Environmental Protection Agency, et al.*, No. 12-9524

FOR THE U.S ENVIRONMENTAL PROTECTION AGENCY:

Dated: 7/19/22


Samuel Coleman, P.E.
Acting Regional Administrator
U.S. Environmental Protection Agency, Region 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 18 2012

OFFICE OF
AIR AND RADIATION

Mr. Stuart Solomon, President
Public Service Company of Oklahoma
212 East 6th Street
Tulsa, OK 74119

Mr. Steve Thompson, Executive Director
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

Dear Mr. Solomon and Mr. Thompson:

I want to express my thanks to both of you and the others who participated in the discussion on Thursday, July 12, 2012 regarding the remaining issues in Public Service Company of Oklahoma's (PSO) forward-looking and comprehensive approach to achieving emission reductions in Oklahoma. I know I speak not only for the EPA Office of Air and Radiation, but also for Sam Coleman and his team in EPA Region 6, in expressing my appreciation for all the hard work and commitment it has taken you to reach this accord.

EPA is pleased with the final agreement made by the State of Oklahoma and PSO to develop its plan for reducing emissions to meet state and federal requirements at the two coal-fired generating units at its Northeastern Station in Oologah, Oklahoma. While this agreement is focused on complying with the visibility requirements of the Clean Air Act, the control technology described in the agreement is also intended to achieve compliance with the Mercury and Air Toxics Standard (MATS). EPA supports such a comprehensive approach. Furthermore the types of controls that PSO plans to install (a combination of Dry Sorbent Injection (DSI) and subbituminous coal to meet the acid gas limits, activated carbon injection and a baghouse to meet the mercury limits, and a baghouse to meet the PM limits) are the types of controls that, when well designed and operated, EPA would expect to be able to meet the MATS limits.

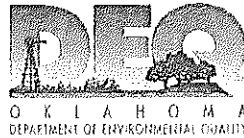
EPA has every confidence that this technology, when properly installed and operated, will provide a means for PSO to meet both the visibility requirements of the Clean Air Act and the MATS requirements. This is exactly the type of agreement that will provide for a cost-effective approach to meet both the visibility requirements of the Clean Air Act and ultimately the MATS rule. EPA is committed to work closely with ODEQ in the development of the proposed SIP revision for a revised BART determination for the PSO plant based on the plan outlined in this agreement.

I look forward to the continued success of our organizations in the implementation of this important agreement.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Gina McCarthy', with a large, sweeping flourish at the end.

Gina McCarthy
Assistant Administrator



STEVEN A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

September 10, 2012

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Stuart Solomon
President and Chief Operating Officer
Public Service Company of Oklahoma
212 East Sixth Street
Tulsa, Oklahoma 74119

**Re: Response to PSO Request of One (1) year Extension of MATS Compliance Date for
Northeastern Power Station Units 3 and 4**

Dear Mr. Solomon:

The purpose of this letter is to respond to Public Service Company of Oklahoma's ("PSO") request dated August 2, 2012, for a one (1) year extension of the compliance deadlines set forth in the U.S. EPA's Mercury Air Toxics Standard ("MATS Rule"), 77 Fed.Reg. 9304 (Feb. 16, 2012), for Units 3 and 4 at PSO's Northeastern Power Station. The MATS Rule was published on February 16, 2012, and became effective on April 16, 2012.

The compliance deadline for regulations promulgated pursuant to § 112(d) of the federal Clean Air Act is no later than three (3) years after the effective date of the standard. *See also* 42 U.S.C. § 7412(i)(3)(A). Accordingly, the compliance deadline for the MATS Rule is April 16, 2015.

The federal Clean Air Act and U.S. EPA's implementing regulations allow the Oklahoma Department of Environmental Quality ("ODEQ"), as the State agency with an approved permitting program, to "grant[] an extension permitting an existing source up to 1 additional year to comply with standards . . . if such additional period is necessary for the installation of controls." *See* 42 U.S.C. § 7412(i)(3)(B); *see also* 40 C.F.R. § 63.6(i)(4)(i)(A).

PSO has indicated that the requested extension is necessary in order to install the emission control equipment discussed below on one coal-fired unit, as well as to replace generation from the unit being shut down and avoid a generating capacity reserve deficiency under Southwest Power Pool criteria.

U.S. EPA's implementing regulations require a request for extension to include: a description of the controls to be installed to comply with the standard; and a compliance schedule. *See* 40 C.F.R. § 63.6(i)(6)(i). In addition, the compliance schedule is required to include the date by which installation of the emission control equipment will commence and the date by which final

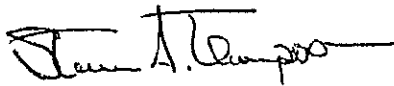
PSO MATS Extension Letter
September 10, 2012
Page 2 of 3

compliance is achieved. *See id.* PSO's request identifies the applicable control equipment to include: Dry-Sorbent Injection; Activated Carbon Injection; and a pulse-jet fabric filter baghouse. Moreover, it appears from Attachment A to PSO's request that construction will commence by June 1, 2014, and final compliance with the MATS Rule will be achieved by April 16, 2016.

ODEQ agrees that the circumstances under which PSO's request is based are consistent with the range of circumstances justifying an extension described in the preamble to the MATS Rule. *See* 77 Fed.Reg. 9410-12 (Feb. 16, 2012). Based on the information provided in PSO's request, the agency has determined that an extension of the compliance date is warranted. Consequently, the request is granted and the MATS compliance deadline for Units 3 and 4 at PSO's Northeastern Power Station is extended until April 16, 2016.

As part of the extension process provided in EPA's regulations, "[t]he owner or operator of an affected source who has requested an extension of compliance under this paragraph . . . [is required to] apply to have the source's title V permit revised to incorporate the conditions of the extension of compliance." 40 C.F.R. § 63.6(i)(4)(i)(A). Once an administratively complete application for permit modification is received, ODEQ may take the necessary steps to incorporate the extension into PSO's permit. Thank you for your request and the information provided. If you have any questions or concerns, please do not hesitate to contact me at (405) 702-7100.

Sincerely,



Steven A. Thompson
Executive Director
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677

cc: Samuel Coleman, P.E.
Acting Regional Administrator
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Secretary Gary Sherrer
Oklahoma Secretary of Environment
3800 Classen Boulevard
Oklahoma City, Oklahoma 73118

PSO MATS Extension Letter
September 10, 2012
Page 3 of 3

Eddie Terrill
Director, Air Quality Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677



March 29, 2011

Stuart Soloman
AES-PSO
212 East 6th Street
Tulsa, OK 74119

Dear Mr. Soloman:

As you are aware, federal pollution control requirements are rapidly converging, affecting all electric generating units operating within the state. Some of you are already affected by the Regional Haze rule, while everyone is likely subject to either the utility toxics rule, commonly called the Utility MACT, or Utility NSPS, which were announced by EPA in proposed form on March 15. These rules are in addition to the requirements associated with the lowering of the National Ambient Air Quality Standards for both SO₂ and NO₂ in 2010.

State policy leaders met on Friday, March 11, 2011, regarding the possibility of developing a statewide plan addressing all of the federal requirements affecting electric generating units within Oklahoma. Ideally, any such plan would include all electric generating units within the state, including those regulated by the Corporation Commission. It is our belief that this approach will provide greater environmental benefits and regulatory/financial certainty for both the utilities and the citizens of Oklahoma.

By this letter, we are encouraging your company to participate in the process, which will be coordinated by the Department of Environmental Quality. Participation in the process will not commit your company to do anything. We are hopeful that the collective development of a coordinated plan will be beneficial to your company.

It is anticipated that actual work on this plan will begin sometime in April, after we know more about the requirements contained in the Utility MACT and NSPS proposals. Should your company desire to participate or if you have any questions as you make your decision, please contact either Steve Thompson, DEQ Executive Director, at 405-702-7161 or steve.thompson@deq.ok.gov, or Eddie Terrill, DEQ Air Quality Division Director, at 405-702-4155 or eddie.terrill@deq.ok.gov.

Sincerely,

A handwritten signature in cursive script, reading "Gary L. Sherrer".

Gary L. Sherrer
Secretary of Environment

A handwritten signature in cursive script, reading "C. Michael Ming".

C. Michael Ming
Secretary of Energy



E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

September 30, 2011

Mr. Stuart Solomon
President and CEO
Public Service Company of Oklahoma
212 East 6th Street
Tulsa, Oklahoma 74119

Dear Mr. Solomon:

As you know, on June 1, 2011 I filed suit against the Environmental Protection Agency (EPA) in the Western District of Oklahoma over the Regional Haze Rule.

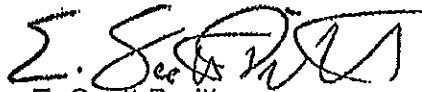
This suit alleges the EPA failed to follow the required approval process by rejecting Oklahoma's State Implementation Plan (SIP) and proposing its own Federal Implementation Plan (FIP). The purpose of this litigation was threefold: to preserve Oklahoma's rights under the Clean Air Act; to protect the interests of Oklahoma ratepayers from a costly EPA proposal; and to preserve Oklahoma's broader right to set its own energy policy. The EPA responded to our suit by filing a Motion to Dismiss. That motion has been fully briefed by the parties and is now in the hands of Judge Friot.

While I am confident in the claims and arguments we have raised in the District Court, it was my expressed hope at the beginning of this process the stakeholders most impacted by the proposed FIP would use the time during the pendency of this litigation to develop a revised SIP that could be presented to EPA for consideration.

This approach would allow the State of Oklahoma and the interested parties within our state to retain control of this process going forward. I understand this process involves a multitude of divergent interests. It may be difficult to develop a common proposal that sufficiently reflects all of these interests. That being said, I would appreciate an update from you on the status of progress made and discussions held in these matters, whether they were among the stakeholders themselves or between the stakeholders and the EPA. This information would be useful to me as I plan our litigation strategy going forward.

Please contact Sheila Harder at (405) 522-4396 in my office to schedule a time to meet at your earliest possible convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Scott Pruitt", written over a horizontal line.

E. Scott Pruitt
Attorney General

cc: Mr. Bud Ground
Manager of State Government and
Environmental Affairs
Public Service Company of Oklahoma
1601 NW Expressway, Suite 1400
Oklahoma City, OK 73118

VAUGHT & CONNER, PLLC

a professional limited liability company

Attorneys at Law

1900 NW Expressway, Suite 1300

Oklahoma City, OK 73118

Telephone: 405-848-2255

Fax: 405-840-4701

CHERYL A. VAUGHT

May 20, 2013

Re: Proposed Regional Haze SIP Revision

To Whom It May Concern:

I am writing this letter on behalf of Dogwood Energy, LLC ("Dogwood"), a generator of electric power, in support of the proposed Regional Haze SIP Revision. Dogwood submits that the SIP fully complies with federal requirements to reduce regional haze and interstate pollution from the Northeastern coal-fired power plant in Oologah, Oklahoma. The requirement to retire one Northeastern unit by 2016, along with retrofits and a steady ramp-down of capacity at the other toward retirement in 2026, is a more cost-effective solution than requiring the installation of expensive scrubbers on both units. For the reasons set forth herein, Dogwood requests that the Oklahoma Department of Environmental Quality (DEQ) approve and finalize the SIP.

The SIP Revision is consistent with the State of Oklahoma's energy plan. The state energy plan prioritizes the increased use of Oklahoma's energy resources such as wind and natural gas, and protection of public health and the environment.¹ Oklahoma is an exporter of both natural gas and wind, but a major importer of coal, including the coal burned by the Northeastern units. In 2012, Northeastern imported more than 3 million tons of coal from mines in Campbell, Wyoming, at a cost of roughly \$63 million.² Adding scrubbers would have required continuation of those imports, requiring rail transport of large amounts of coal. The SIP Revision will instead encourage use of Oklahoma resources and the elimination of Northeastern's coal imports by 2026.

Transitioning from coal to gas, wind, energy efficiency, and demand response also has significant benefits for the overall reliability of the grid. As the amount of wind in Oklahoma and the Southwest Power Pool (SPP) rises, fossil generation will need to ramp production up and down more frequently, and to shut down for various periods of time during high wind production. The switching option would result in plants better suited to integrate with variable wind generation, both technically (since coal plants generally ramp more slowly than gas plants and often require longer periods between starts and stops) and economically (since the large investment in scrubbing and other environmental compliance will be partially stranded if coal units are often ramped down to accommodate wind energy, while gas plants would avoid their fuel costs).

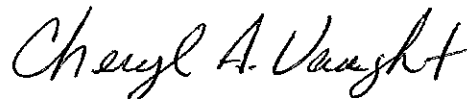
¹ Governor Mary Fallin & Secretary of Energy Michael Ming, Oklahoma First Energy Plan (2011), at 3, 5, *available at* <http://www.ok.gov/governor/documents/Governor%20Fallin's%20Energy%20Plan%20-%20Jan%202012.pdf>

² SNL Financial (based on Energy Information Administration Form EIA-923 filings).

The SIP Revision is a practical and legally sufficient response to EPA's disapproval of Oklahoma's BART determinations for sulfur dioxide for the Northeastern units.³ Dogwood agrees with DEQ that, with respect to the Northeastern units, the SIP Revision also addresses the state's obligation to address the visibility impacts of pollution transported to other states. The SIP Revision will also contribute to the state's "reasonable progress toward meeting the national goal" of eliminating human-caused visibility impairment by 2064.

Oklahoma has the discretion to choose the "best" option, so long as it has considered all relevant factors consistent with the BART guidelines, and "provide[d] a justification." Dogwood believes DEQ correctly and justifiably chose the alternative that provides for the gradual phase-out of the Northeastern coal units. Dogwood supports the SIP Revision and urges DEQ to promptly move forward with finalizing and implementing the rule.

Sincerely,



Cheryl A. Vaught, OBA # 11184
Vaught & Conner, PLLC
1900 NW Expressway, Suite 1300
Oklahoma City, OK 73118
Telephone: 405-848-2255
Fax: 405-840-4701

³ Because Oklahoma continues to dispute appropriate BART determination for the four remaining units, owned by Oklahoma Gas & Electric, this SIP Revision does not fully displace the FIP.



Regional Partners — Regional Solutions

2 West Second Street Suite 800 | Tulsa, OK 74103 | 918.584.7526 | www.INCOG.org

May 17, 2013

Ms. Cheryl Bradley
Air Quality Division
Oklahoma Department of Environmental Quality
707 N. Robinson
Oklahoma City, OK 73101

In the matter of:

Public Hearing and Opportunity for Comment on the Oklahoma Department of Environmental Quality Revision to Regional Haze State Implementation Plan Including Revisions to Affected Portion of the Interstate Transport SIP for the 1997 8-hour Ozone and 1997 PM 2.5 NAAQS – relating to the American Electric Power/Public Service Company of Oklahoma (AEP/PSO) Northeastern Power Station Units 3 & 4.

The Indian Nations Council of Governments (INCOG) is a voluntary association of local governments serving the Tulsa metropolitan area and communities throughout northeastern Oklahoma. INCOG has been involved in air quality planning, advocacy and public education since the 1980's.

INCOG recognizes the diligent efforts of ODEQ, Public Service Company of Oklahoma (PSO), the Oklahoma Secretary of the Environment, the United States Environmental Protection Agency (EPA), and the Sierra Club to reach a settlement agreement relating to PSO's Northeastern electric generating coal-fired units 3 and 4.

The proposed Regional Haze Revised State Implementation Plan (RH SIP) will dramatically reduce the facilities' short and long term emissions through the use of the Best Available Control Technology (BART). Consequently, these SO₂ and NO_x reductions are expected to have a positive impact in reducing ground-level ozone and particulates in the Tulsa metropolitan area.

This Revised RH SIP is the product of initiative, cooperation and common sense. The plan provides a reasonable approach to achieve lower emissions, to meet both federal RH guidelines and federal Mercury and Air Toxics Standard (MATS), and to provide for additional scheduled emissions reductions. Again, thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nancy Graham", is written over the typed name.

Nancy Graham
Air Quality Program Manager, INCOG



May 17, 2013

Department of Environmental Quality, Air Quality Division
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677
ATTN: Cheryl E. Bradley

Re: Comments of Oklahoma Industrial Energy Consumers
("OIEC") on the March 20, 2013 [Proposed] Revision to
Regional Haze State Implementation Plan ("Proposal")

Dear Ms. Bradley:

OIEC is a non-partisan, unincorporated association of large consumers of energy with facilities located in Oklahoma. OIEC is an advocate for fair, just and reasonable utility rates, and for economic development. OIEC's Members are engaged in energy price-sensitive industries such as pulp and paper, cement, refining, glass, industrial gases, plastic, film and food processing. OIEC Members employ thousands of Oklahomans.

Pursuant to the April 18, 2013 Notice of Public Hearing and Opportunity for Comment, OIEC is hereby submitting comments opposing adoption of the above referenced Proposal. The Proposal would determine the revised best available retrofit technology ("BART") for Public Service Company of Oklahoma's ("PSO") Northeastern coal-fired electric generating units 3 and 4 ("Units").

Under the current federal implementation plan ("FIP"), BART for sulfur dioxide ("SO₂") emitted by the Units is dry flue gas desulfurization ("DFGD") control technology. 76 Fed. Reg. 81728 (Dec. 28, 2011). The Proposal is that BART for SO₂ emitted from the Units be: "(1) the facility will shut down one of the affected units (either 3 or 4) by April 16, 2016; (2) the facility will install and operate a dry sorbent injection ('DSI') system on the remaining unit to meet an emission standard of 0.40 lb/mmBTU or less from April 16, 2016 to December 31, 2026; and (3) the facility will incrementally decrease capacity utilization for the remaining unit between 2012 and 2016, and will shut down the remaining unit no later than December 31, 2016." [Proposed] Regional Haze Implementation Plan Revision, p. 6 (Mar. 20, 2013).

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OIEC is opposing adoption of the Proposal because the agreement on which the Proposal is based may be void; early retirement of a facility cannot be a BART control option; the significant replacement capacity and energy costs arising from the early retirement of the Units have not been considered, and make the Proposal much more costly than the DFGD retrofit alternative; the Proposal cannot be a valid alternative to BART because it results in decreased visibility and higher SO₂ emissions when compared to the DFGD alternative, and therefore does not make greater reasonable progress than does BART; and the significant adverse effect of the Proposal on electricity charges to PSO's ratepayers has been ignored. Accordingly, and based upon the further explanation of each of these points below, OIEC requests that the Proposal be withdrawn¹.

1. The underlying Agreement. The Proposal is based upon, and is intended to implement, a settlement agreement ("Agreement"). [Proposed] Regional Haze Implementation Plan Revision, p. 4 (Mar. 20, 2013). That Agreement was executed on behalf of the State of Oklahoma by Gary L. Sherrer, Secretary of the Environment for the State of Oklahoma (the "Secretary"). The Secretary has certain limited statutory duties, and such other duties as designated by the Governor. 27A O.S. §1-2-101 (2011). Binding the State by entering into settlement agreements is not a statutory power of the Secretary, nor could it be considered an implied power necessary to an efficient exercise of his limited express duties. *Strong v. Police Pension and Retirement Bd.*, 115 P. 3d 889, 893 (Okla. 2005). Accordingly, unless the Secretary has some written authority from the Governor authorizing him to enter into settlement agreements binding the State, which writing would have to have been issued prior to October 1, 2012, the date the Secretary executed the Agreement, the Agreement is an *ultra vires* act of the Secretary and hence void. See, *Canning v. NLRB*, 705 F. 3d 490, 513-14 (CA10 2013). If the Agreement is void, DEQ should withdraw the Proposal, because it no longer has any basis.

2. Shut down cannot be BART. BART "means an emission limitation based on the degree of reduction achievable through the application of the best system of continuous emission reduction for each pollutant which is emitted by an existing stationary facility." 40 C.F.R. §51.301. Simply put, BART is defined to constitute the available retrofit technology which is expected to be most cost effective and most effective in reducing air emissions and improving visibility for certain existing stationary sources. EPA's BART Guidelines provide that BART cannot be conversion of an existing coal plant to natural gas (40 C.F.R. Part 51, Appendix Y, §IV(D)(3) and (5)), because conversion is not "retrofitting." See also, 76 Fed. Reg. 81750 (Dec. 28, 2011). For similar reasons, mandating the early retirement of a generating facility to achieve emissions reductions also cannot be BART. Not only would there be no "retrofit"; there would cease to be "an existing stationary facility." Accordingly, the Proposal, which requires retirement of the Units years before the end of their useful operating lives, cannot be adopted as BART.

¹ OIEC suggests that if the Proposal is withdrawn, PSO should provide the Oklahoma Department of Environmental Quality ("DEQ") with additional supplemental BART determination information, based upon conditions as they exist today.

3. Cost Effectiveness Evaluation. Even assuming, *arguendo*, that mandating the early retirement of the Units could be considered as part of a BART proposal, it was error to not consider certain important “costs of compliance” as required by applicable regulations. 40 C.F.R. §51.301 (definition of BART). These omitted compliance costs include: a) the cost of replacement capacity and energy arising from the mandated retirement of one of the Units in 2016; b) the cost of replacement energy arising from the capacity restrictions which are imposed on the second Unit during the period 2021-2026; and c) the cost of replacement capacity and energy arising from the mandated retirement of the second Unit no later than 2026. By improperly ignoring the replacement capacity and energy costs arising from the mandated early retirements of the Units, the analysis has incorrectly concluded that the cost effectiveness in dollars per ton of SO₂ removed for the Proposal is \$1,005 per ton, which is lower than the estimated SO₂ removal cost for the DFGD technology (\$1,544/ton) that EPA determined to be BART in the existing FIP. In fact, by ignoring replacement capacity and energy costs arising from the mandated retirements and operating restrictions, the cost of the Proposal is understated by at least \$262 million per year, as explained further below (this \$262 million does not include the additional replacement energy costs discussed in paragraph (iii) below):

- (i) Based on PSO's forecast as presented in Oklahoma Corporation Commission (“OCC”) Cause No. PUD 201200054, the replacement capacity cost for the Unit which must be retired in 2016 would be at least \$56 million per year.
- (ii) Based on PSO's forecast in OCC Cause No. PUD 201200054, the replacement capacity cost for the Unit which must be retired in 2026 would be at least \$68 million per year.
- (iii) Based on the 85% annual capacity factor assumed in the analysis, and a forecasted \$20/MWh differential between coal and natural gas energy costs, the replacement energy cost due to the operating restrictions placed on the remaining Unit during the 2021-2026 period would be approximately \$20 million per year (\$120 million total).
- (iv) Based on the 85% annual capacity factor assumed in the analysis, and a forecasted \$20/MWh differential between coal and natural gas energy costs, the replacement energy cost for the Units after both are retired would be approximately \$138 million per year.

Adding the \$262 million per year of estimated replacement capacity and energy costs arising from retirement of the Units to the \$25 million per year cost estimate for other compliance costs under the Proposal results in a total compliance cost of \$287 million per year. This amount is more than six times the cost estimate for the DFGD retrofit option (\$45 million per year). Thus, the Proposal will be approximately \$242 million a year more costly than the existing BART.

The much higher cost which would be incurred by PSO's customers under the Proposal is not justified when compared to costs of the DFGD retrofit or fuel switching alternatives. For example, as summarized in Table 1, when replacement capacity and energy costs for the retired

Units are properly considered, the compliance costs of the Proposal as measured on a dollars per ton of SO₂ removed (\$11,532 per ton) and a dollars per deciview improvement (\$65,323,175) basis, are three to four times higher than the cost of compliance under the DFGD retrofit alternative, and are approximately three times higher than the upper range of costs which have been found to be cost effective by the EPA in other BART determinations. These results reflect the fact that the Proposal is far more costly than the DFGD alternative or other BART determinations, and at the same time would actually result in higher SO₂ emissions and less visibility improvement than the DFGD alternative.

Table 1
Cost Comparison for RH Compliance Options

	<u>Annual Cost</u>	<u>SO₂ Removal Tons/Yr</u>	<u>SO₂ Emissions Removal \$/Ton</u>	<u>Visibility Improvement dV</u>	<u>Visibility Cost \$/dV Chg</u>
<u>DEQ Original SIP (Feb 2010)</u>					
DFGD Retrofit Option	\$86,752,803	26,339	\$3,294	3.80	\$22,835,694
<u>EPA FIP (December 2011)</u>					
DFGD Retrofit Option	\$44,969,595	29,119	\$1,544	4.66	\$9,639,785
<u>DEQ Revised SIP (March 2013)</u>					
DFGD Retrofit Option	\$44,969,595	29,119	\$1,544	4.66	\$9,639,785
EPA Settlement without Coal Replacement Costs	\$25,000,000	24,888	\$1,005	4.39	\$5,690,172
EPA Settlement including Coal Replacement Costs	\$287,000,000	24,888	\$11,532	4.39	\$65,323,175

In addition, as shown in Table 2, the \$11,532 per ton of SO₂ removed under the Proposal is approximately three to eight times the level of costs approved by EPA in BART determinations for other power plants, which range from \$1,462 per ton up to \$3,547 ton².

² See page 41 of the October 2010 report, "Revised BART Cost-Effectiveness Analysis for Flue Gas Desulfurization at Coal-Fired Electric Generating Units in Oklahoma." Prepared for the U.S. EPA.

Table 2
EPA Cost Effectiveness Values for Coal Unit BART Determinations

	Gross Rating <u>MW</u>	Coal Sulfur <u>lb/MMBtu</u>	Approved BART <u>Cost, \$/Ton</u>
Big Stone 1	475	0.86	\$1,462
Nebraska City 1	650	0.82	\$1,636
Boswell 3	375	0.95	\$1,640
Naughton 1	176	1.18	\$1,877
Naughton 2	234	1.18	\$1,882
Stanton 1	188	1.20	\$2,006
White Bluff 1&2	2 x 850	0.68	\$2,430
Drake 7	142	0.83	\$2,544
Gerald Gentleman	2 x 750	0.75	\$2,726
Drake 6	85	0.82	\$2,816
Boardman	617	0.61	\$3,055
Silver Bay 2	75	<u>0.60</u>	<u>\$3,547</u>
Average		0.87	\$2,302
Northeastern 3&4 (Rev. SIP)	930	0.90	\$11,532

In fact, the Proposal is not cost effective, even when evaluated over an extended time period. For example, on page 4-6 of the Supplemental Bart Determination Information report, Trinity Consultants, Inc. (PSO's consultant) has presented the results of an analysis which suggests that the Proposal would reduce total SO₂ emissions over the 2014-2046 period by approximately 18,145 tons when compared to the level of forecasted SO₂ emissions under the DFGD retrofit alternative. However, the bases for these projections were not provided. Absent back-up documentation, that analysis is unreliable and cannot be relied upon. Even assuming these projections are correct, they would equate to an average SO₂ reduction of 567 tons per year over the 32-year study period when compared to the level of SO₂ emissions under the DFGD retrofit alternative. In light of the fact that the Proposal is forecasted to cost \$242 million per year more than the DFGD retrofit alternative, this means that the incremental cost to achieve the additional 567 tons per year of SO₂ reduction under the Proposal would be approximately \$426.8 thousand per ton. This incremental cost for SO₂ removal under the Proposal is nearly 100 times the first year incremental cost for SO₂ removal (\$4,718 per ton) for the DFGD (i.e., existing FIP) alternative, which itself is too high. Revised BART Determination, p. 11 (Mar. 19, 2013) ("Revised BART Report").

Moreover, it was previously concluded that the much lower cost DFGD retrofit option is not cost effective, as indicated on page 81 of the February 2010 Regional Haze State Implementation Plan ("SIP"):

DEQ conducted a thorough case-by-case five-factor BART analysis for each of the BART-subject units. DEQ determined that Dry-Flue Gas Desulfurization with Spray Dryer Absorber (“Dry FGD with SDA”) is not cost-effective for SO₂ control for any of the six coal-fired steam electric units reviewed, i.e., OG&E Sooner Units 1 and 2, OG&E Muskogee Units 4 and 5, and PSO Northeastern Units 3 and 4. This determination is based on the capital cost of add-on controls, the cost effectiveness both in dollars per ton and dollars per deciview of add-on controls, and the long term viability of coal with respect to other environmental programs, and national commitments. In addition to information provided prior to the public hearing, DEQ considered public comments, and additional information provided by the affected facilities in response to questions raised by the commentors and DEQ staff. Revised cost estimates were provided by the affected facilities that are based on vendor quotes and go well beyond the default methodology recommended by EPA guidance. The cost estimates are credible, detailed, and specific for the individual facilities. The final estimate for Dry FGD with SDA for the six coal-fired units was on average 153% greater than the high end costs assumed by DEQ in the Draft SIP. These costs put the projects well above costs reported for other BART determinations, and above the levels DEQ considered reasonable for cost effectiveness both in terms of dollars per ton of pollutant removed and dollars per deciview (e.g., \$10,000,000/dv) of improved visibility.

In summary, the Proposal is considered cost effective based on an analysis that does not include approximately \$262 million per year of replacement capacity and energy costs which PSO would be required to incur due to the mandated early retirement of the Units. When these replacement costs are considered, the costs of the Proposal are far higher than the DFGD retrofit option, which previously was determined to not be a cost effective option. For these reasons, the Proposal cannot be determined to be cost effective when compared to the DFGD retrofit alternative or other EPA BART determinations.

4. Visibility/Greater Reasonable Progress Evaluation. It has not been demonstrated that the Proposal meets the requirement that approvable alternatives to BART must achieve greater reasonable progress than would be achieved through the installation and operation of BART (i.e., the DFGD retrofit option). 40 C.F.R. §51.308(e)(2)(i). In fact, on page 11 of the Revised BART Report, it is acknowledged that the DFGD option “would provide improvements in visibility above that achieved with the DSI system” but argues that such improvements would not be perceptible. This conclusion clearly indicates that the Proposal does not meet the greater reasonable progress standard with regard to visibility improvement.

In addition, a significant portion of the emissions reductions attributed to the Proposal could also be achieved by switching to ultra-low sulfur coal (as recommended by DEQ’s original SIP) and by installing DSI control technology to meet requirements of the MATS rule, which would be necessary by 2016 even if the Proposal did not exist. For example, by simply switching to ultra-low sulfur coal PSO could reduce total forecasted SO₂ emissions on its system by approximately 33%, while the addition of DSI controls, which is required by MATS, produces approximately 67 thousand tons (6.4%) of the total forecasted SO₂ removal attributed to the Proposal. The DSI emission reductions cannot be used to achieve greater reasonable

progress because it must be: “demonstrat[ed] that the emission reductions resulting from the emissions trading program or other alternative measure will be surplus to those reductions resulting from measures adopted to meet requirements of the CAA as of the baseline date of the SIP.” 40 C.F.R. §51.308(e)(2)(iv) (emphasis added).

By including emissions reductions arising from DSI and by ignoring reductions which could be achieved through switching to ultra-low sulfur coal, the Proposal overstates the emissions reductions due to the Proposal which are surplus to reductions that were achievable through other control measures or by implementing measures to meet CAA requirements that existed as of the baseline date of the revised SIP.

Also, any alternative to BART must require that: “all necessary emission reductions take place during the period of the first long-term strategy for regional haze.” 40 C.F.R. §51.308(e)(2)(iii). The first long-term strategy period ends in 2018. However, the Proposal fails to meet this requirement, because the level of SO₂ emissions under the Proposal is expected to be significantly higher than emissions under the DFGD alternative until well after 2018. SO₂ emissions will only be lower when the second Unit is retired. The SO₂ emission rate for DSI (estimated at 0.4 pounds per MMBtu) is six point six times the forecasted emission rate of the Units (0.06 pounds per MMBtu) with DFGD control technology.

Accordingly, the Proposal cannot be adopted as a formal alternative to BART, and it should be withdrawn.

OIEC also questions the assertion on page 12 of the Revised BART Report that it expects cumulative SO₂ and NO_x emissions from the Units are expected to be approximately 36% of the emissions level that would result from the DFGD retrofit option. Underlying details of the analysis supporting the above assertion were not provided with the Revised BART Report. Absent back-up documentation, that assertion is unreliable and cannot be used to justify the Proposal.

In addition, the Proposal ignores the additional NO_x emissions that would be produced by gas-fired generation or purchased power sources that PSO would have to acquire to replace the Units after they are retired in 2016 and 2026. Finally, it was assumed that, if DFGD retrofitted, the Units would operate for another 30 years (i.e., until 2046). There is no support for this assumption. In fact, PSO has stated in testimony in OCC Cause No. PUD 201200054 that it expects the Units would likely be retired by 2030 (i.e. 13 years after DFGD retrofits are implemented). If the emissions analysis was adjusted to reflect a shorter remaining operating life of the Units, consistent with PSO’s own forecast, and to account for NO_x emissions produced from sources that replace the Units, the estimated emissions reduction attributable to the Proposal would likely be eliminated.

5. The BART analysis is based on outdated planning assumptions. The BART analysis supporting the Proposal is based on PSO long-term planning studies that are no longer valid. On April 9, 2013, the Company announced to the OCC that it will have to update its Integrated Resource Plan (“IRP”) to reflect previously unanticipated increases in near-term peak demand due to recent significant growth in oil and gas production activities on its system. These

changes will increase replacement costs for the Units and also increase future SO₂ and NO_x emissions on PSO's system, and thereby could significantly alter results of the BART analysis supporting the Proposal. Due to these material changes, DEQ's current BART analysis is no longer valid and therefore needs to be revised once PSO's updated IRP is completed and approved by the OCC later this year.

6. Ratepayer Impacts have been ignored. The Proposal completely ignores the potentially devastating impact of the Proposal on PSO's ratepayers, presumably because EPA doesn't consider such impacts relevant in a BART analysis. However, as we have shown herein, the Proposal cannot be BART or a formal BART alternative. In that context, EPA has recognized that utility companies can consider "any potential impact on rates." 76 FR 81749 (Dec. 28, 2011). See also, 27A O.S. 2-5-107(4) (2011) (economic impacts are to be considered). Accordingly, the potentially devastating impact of the Proposal on PSO's ratepayers must be considered here. Evidence presented by PSO in OCC Cause No. PUD 201200054 indicates that the Proposal may significantly increase costs to ratepayers. Parties have presented testimony in OCC Cause No. PUD 201200054 to the effect that the Proposal could increase rates by 15% to 19% in 2016, and that future rate increases due to the Proposal are expected to be much larger. Moreover, PSO's own analysis in OCC Cause No. PUD 201200054 indicates that the costs to ratepayers are expected to be approximately \$1.9 billion higher under the Proposal than they would be under the DFGD retrofit alternative over the 2016-2040 period. This independent analysis by PSO further confirms that the Proposal is not cost effective when compared to the DFGD alternative. Moreover, estimates presented by OIEC in testimony presented in OCC Cause No. PUD 201200054 indicate that the Proposal could be approximately \$5 billion more costly to ratepayers than the low sulfur coal alternative which was designated by DEQ as BART in its original SIP.

In summary, the basis for the Proposal may be void, the Proposal impermissibly mandates retirement of the Units, it is approximately \$242 million per year more costly than the existing BART (DFGD retrofit) alternative, would result in higher SO₂ emissions and lower visibility, and is forecasted to result in much larger rate increases than the DFGD retrofit option. The cost of the Proposal is also far higher than the ultra-low sulfur fuel switch alternative which DEQ determined to be BART in the original SIP and is approximately three to eight times the cost of BART proposals approved by EPA for other coal plants. Accordingly, the Proposal does not meet the criteria established by the EPA for approval as BART, or as an alternative to BART, and it is not in the interest of PSO's ratepayers. The Proposal should, therefore, be withdrawn.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'T. Schroedter', with a stylized flourish at the end.

Thomas P. Schroedter
Executive Director

RECEIVED

MAY 20 2013

AIR QUALITY



*
PLEASE INCLUDE THE
TWO ATTACHED DOCUMENTS
IN THE RECORD RE: ODEQ
PROPOSED REVISED Regional
HAZE SIP

OFFICE OF THE ATTORNEY GENERAL
FACSIMILE TRANSMITTAL COVER SHEET

DATE: May 20, 2013
TO: CHERYL E. BRADLEY
OF: ODEQ - AIR QUALITY DIVISION
FAX #: (405) 702-4101
FROM: OK ATTORNEY GENERAL'S OFFICE
RE:

- COMMENTS OF ATTORNEY General
- Letter FROM AG PURITT TO Steve Thompson

ATTENTION: transmission consists of 7 page(s), NOT including cover

If you experience any difficulty in receiving this transmission
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OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

RECEIVED
MAY 20 2013
AIR QUALITY

May 20, 2013

Department of Environmental Quality
Air Quality Division
ATTN: Cheryl E. Bradley
P.O. Box 1677
Oklahoma City, OK 73101

Sent via email: Cheryl.Bradley@deq.ok.gov
and Fax: (405) 702-4101

RE: Comments of Oklahoma Attorney General on the Oklahoma Department of Environmental Quality's ("DEQ") March 20, 2013 Proposed Revision to Regional Haze State Implementation Plan ("Revised SIP")

On March 19, 2013, the Air Quality Division of the Oklahoma Department of Environmental Quality ("DEQ") submitted its Revised BART Determination concerning AEP-Public Service Company of Oklahoma's Northeastern Power Plant. As noted in that document, the Northeastern Power Plant is located in Rogers County and consists of two 490 MW coal-fired steam electric generating units. As further noted in the document, after partial approval and partial disapproval of the Oklahoma Regional Haze (RH) State Implementation Plan (SIP) by the Environmental Protection Agency (EPA), a settlement plan was agreed upon between certain parties to address necessary visibility improvements. The stated purpose of DEQ's review regarding the Northeastern Plant "is to document that the agreed-upon control scheme meets the

requirements of the BART review and will serve to replace the disapproved portions of the corresponding BART submittal Analysis in Oklahoma's RH SIP."

In general, the settlement agreement requires that PSO shut down one of the coal-fired units by April 16, 2016, and the second unit by December 26, 2026. While the second unit would remain operational, certain emissions controls would be installed and PSO would gradually restrict capacity utilization of that unit beginning in 2021. The Attorney General would note that inherent in the settlement plan is the retirement of two coal-fired electric generating units and the obvious need to replace either a portion or all of the capacity/energy associated with those plants. The Attorney General would further note that the first of five factors considered by DEQ in its BART determination is "the costs of compliance" (*see Revised BART Determination, p.10*).

A review of DEQ's Revised BART Determination reveals a fundamental omission—while DEQ considered the cost of emissions control equipment over the life of the operating coal unit, it did not consider the cost of replacement capacity/energy for both units that is, of necessity, part of the plan. The need to replace capacity/energy resulting from the retirement of a unit by 2016 is evinced by PSO's agreement with Calpine to provide approximately 250 MWs of purchased-power by that date. The costs of that contract range from \$29 million to \$31 million per year for the fifteen (15)-year term of the contract. Additional costs associated with that replacement power arise from the difference in costs between the use of coal and the use of natural gas as a fuel source. The additional costs associated with the decreased utilization and eventual retirement of the second unit in 2026 are, at this time, un-quantified as PSO has not established a plan for replacement power for that unit.

Another factor complicates and makes questionable the cost of compliance analysis. PSO has recently notified the Oklahoma Corporation Commission (Commission) that it intends to submit an amended Integrated Resource Plan (IRP). The stated purpose for the amendment is PSO's updated need to serve approximately 250 MWs of load in the 2016 timeframe. PSO's 2012 IRP, finalized on September 26, 2012, provided for replacement of only roughly one-half of the capacity/energy of the 490 MW coal-fired plant to be retired in 2016. It is now evident that replacement for the entire capacity/energy output of that plant is necessary. As such, the costs associated with the settlement plan must now be re-examined as it is obvious that additional cost, although currently un-quantified, results from the retirement of that plant.

DEQ has concluded that the Proposal is cost effective based on an analysis that does not include replacement capacity and energy costs which PSO would be required to incur due to the mandated early retirement of the Units. According to the record, DEQ's analysis omitted the following compliance costs: The cost of replacement capacity that will be incurred because of the retirement of one of the units in 2016; The costs of replacement energy which will occur when the restrictions on capacity for the second unit go into effect in 2021-2026; and the cost of replacement capacity which will occur when the second unit is retired in 2026. The omission of these costs of compliance in the analysis means that DEQ's cost effectiveness determination is based on incomplete information and clearly underestimates the true costs of the proposal, and by extension, the cost effectiveness of the revised SIP.

In addition, the early retirement of the units arguably makes the settlement proposal and the resulting revised SIP much more costly and stringent than the EPA Federal Implementation Plan.

Pursuant to Title 27A O.S. Section 1-1-206 - Economic Impact - Environmental Benefit Statement:

A. Each state environmental agency in promulgation of permanent rules within its areas of environmental jurisdiction, prior to the submittal to public comment and review of any rule that is more stringent than corresponding federal requirements, unless such stringency is specifically authorized by state statute, shall duly determine the economic impact and the environmental benefit of such rule on the people of the State of Oklahoma including those entities that will be subject to the rule. Such determination shall be in written form.

B. Such economic impact and environmental benefit statement of a proposed permanent rule shall be issued prior to or within fifteen (15) days after the date of publication of the notice of the proposed permanent rule adoption. The statement may be modified after any hearing or comment period afforded pursuant to Article I of the Administrative Procedures Act.

C. The economic impact and environmental benefit statement shall be submitted to the Governor pursuant to Section 303.1 of Title 75 of the Oklahoma Statutes and to the Legislature pursuant to Section 308 of Title 75 of the Oklahoma Statutes. Such reports submitted to the Governor and to the Legislature shall include a brief summary of any public comments made concerning the statement and any response by the agency to the public comments demonstrating a reasoned evaluation of the relative impacts and benefits of the more stringent regulation.

It does not appear that the DEQ has conducted or submitted this statutorily required Economic Impact – Environmental Benefit Statement. The Revised SIP, once approved through notice and comment rulemaking, will be submitted to the EPA for promulgation, again, after notice and comment, as a final rule. Here, where the ODEQ BART determination includes the retirement of one unit in 2016, and additional controls and then the subsequent retirement of a second unit in 2026, a determination more stringent than the EPA FIP, the DEQ should determine the economic impact of the rule (the Revised State SIP) and the environmental benefit of the rule, on the people of the State of Oklahoma, which includes rate payers that will be affected by the rule.

In summary, it does not appear that DEQ considered the total costs of compliance in its Revised BART Determination, as the cost of replacement capacity and energy was omitted from the analysis. That replacement cost data should be considered in any determination regarding the cost of compliance inherent in the PSO/EPA settlement plan and will not be available until a thorough examination of PSO's amended IRP is accomplished. PSO has stated its intention to submit its amended IRP in early June of this year and hold a technical conference regarding same

on June 18th. The Attorney General submits that it is necessary that a thorough vetting process occur regarding the revised SIP so that accurate cost information can be obtained. For the above-stated reasons, the Attorney General respectfully requests that DEQ delay any decision regarding approval of the revised SIP. This requested delay will allow the DEQ an opportunity to fully consider all relevant cost information before approving the revised SIP.



E. SCOTT PRUITT
ATTORNEY GENERAL

May 15, 2013

Steven A. Thompson, Executive Director
Oklahoma Department of Environmental Quality
707 N. Robinson
P.O. Box 1677
Oklahoma City, OK 73101-1677

Re: PSO/EPA Settlement Agreement- Revised State Implementation Plan

Dear Mr. Thompson:

As you are aware, the PSO/EPA settlement plan, upon which the revised State Implementation Plan ("SIP") is based, required that Public Service Corporation of Oklahoma ("PSO") decommission one of its coal-fired generation facilities by 2016. The 2012 PSO Integrated Resource Plan ("IRP") provided for the replacement of only 260 MWs of the 500 MW coal-fired generation plant that is scheduled for closure. As such, the cost estimates for the SIP settlement plan are premised upon replacement of roughly only one-half of that plant's capacity and energy. Recently, PSO announced its intention to submit a revised IRP at the Oklahoma Corporation Commission to amend its 2012 IRP. The stated purpose of this amended IRP is to include approximately 250 MWs of electric load that will be served by PSO in the 2016 time frame.

Because PSO has added additional load which now requires a revision to the 2012 IRP, the cost information concerning the PSO/EPA settlement plan and, hence, the revised SIP, may be inaccurate to a degree that cannot be determined at this time. As such, cost assessments that have been conducted in the PSO proceeding at the Corporation Commission and by the Oklahoma Department of Environmental Quality ("DEQ") in association with the SIP are based on incomplete and inaccurate data (see revised paragraph 12 in First Amended Regional Haze Agreement). More accurate cost information will be developed after PSO submits its amended IRP in June of this year and includes the entire 500 MWs of needed capacity/energy as opposed to only 260MWs.

In addition, Title 27A O.S. §1-1-206 "Economic Impact- Environmental Benefit Statement" requires a state environmental agency to duly determine the economic impact and environmental benefit of a permanent rule that is more stringent than corresponding federal requirements, unless such stringency is specifically authorized by state statute. It is certainly arguable that the proposed revised SIP for PSO is more stringent than the previously issued EPA FIP. Without accurate updated

May 15, 2013

Page 2

cost information from PSO's revised IRP, it seems unlikely that any economic impact – environmental benefit statement compiled by DEQ would be accurate.

Based on the above, I respectfully request that DEQ delay the public meeting scheduled for May 20, 2013, and delay a final decision regarding the SIP, until PSO's amended IRP can be fully vetted in proceedings at the Corporation Commission. The 2013 IRP process will yield additional information that will provide the opportunity to ascertain the true cost of the SIP that is required in proceedings at both the Corporation Commission and the DEQ.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Scott Pruitt", with a stylized flourish at the end.

E. Scott Pruitt
Attorney General



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

May 20, 2013

Department of Environmental Quality
Air Quality Division
ATTN: Cheryl E. Bradley
P.O. Box 1677
Oklahoma City, OK 73101

Sent via email: Cheryl.Bradley@deq.ok.gov
and Fax: (405) 702-4101

RE: Comments of Oklahoma Attorney General on the Oklahoma Department of Environmental Quality's ("DEQ") March 20, 2013 Proposed Revision to Regional Haze State Implementation Plan ("Revised SIP")

On March 19, 2013, the Air Quality Division of the Oklahoma Department of Environmental Quality ("DEQ") submitted its Revised BART Determination concerning AEP-Public Service Company of Oklahoma's Northeastern Power Plant. As noted in that document, the Northeastern Power Plant is located in Rogers County and consists of two 490 MW coal-fired steam electric generating units. As further noted in the document, after partial approval and partial disapproval of the Oklahoma Regional Haze (RH) State Implementation Plan (SIP) by the Environmental Protection Agency (EPA), a settlement plan was agreed upon between certain parties to address necessary visibility improvements. The stated purpose of DEQ's review regarding the Northeastern Plant "is to document that the agreed-upon control scheme meets the



requirements of the BART review and will serve to replace the disapproved portions of the corresponding BART submittal Analysis in Oklahoma's RH SIP."

In general, the settlement agreement requires that PSO shut down one of the coal-fired units by April 16, 2016, and the second unit by December 26, 2026. While the second unit would remain operational, certain emissions controls would be installed and PSO would gradually restrict capacity utilization of that unit beginning in 2021. The Attorney General would note that inherent in the settlement plan is the retirement of two coal-fired electric generating units and the obvious need to replace either a portion or all of the capacity/energy associated with those plants. The Attorney General would further note that the first of five factors considered by DEQ in its BART determination is "the costs of compliance" (*see* Revised BART Determination, p.10).

A review of DEQ's Revised BART Determination reveals a fundamental omission—while DEQ considered the cost of emissions control equipment over the life of the operating coal unit, it did not consider the cost of replacement capacity/energy for both units that is, of necessity, part of the plan. The need to replace capacity/energy resulting from the retirement of a unit by 2016 is evinced by PSO's agreement with Calpine to provide approximately 250 MWs of purchased-power by that date. The costs of that contract range from \$29 million to \$31 million per year for the fifteen (15)-year term of the contract. Additional costs associated with that replacement power arise from the difference in costs between the use of coal and the use of natural gas as a fuel source. The additional costs associated with the decreased utilization and eventual retirement of the second unit in 2026 are, at this time, un-quantified as PSO has not established a plan for replacement power for that unit.

Another factor complicates and makes questionable the cost of compliance analysis. PSO has recently notified the Oklahoma Corporation Commission (Commission) that it intends to submit an amended Integrated Resource Plan (IRP). The stated purpose for the amendment is PSO's updated need to serve approximately 250 MWs of load in the 2016 timeframe. PSO's 2012 IRP, finalized on September 26, 2012, provided for replacement of only roughly one-half of the capacity/energy of the 490 MW coal-fired plant to be retired in 2016. It is now evident that replacement for the entire capacity/energy output of that plant is necessary. As such, the costs associated with the settlement plan must now be re-examined as it is obvious that additional cost, although currently un-quantified, results from the retirement of that plant.

DEQ has concluded that the Proposal is cost effective based on an analysis that does not include replacement capacity and energy costs which PSO would be required to incur due to the mandated early retirement of the Units. According to the record, DEQ's analysis omitted the following compliance costs: The cost of replacement capacity that will be incurred because of the retirement of one of the units in 2016; The costs of replacement energy which will occur when the restrictions on capacity for the second unit go into effect in 2021-2026; and the cost of replacement capacity which will occur when the second unit is retired in 2026. The omission of these costs of compliance in the analysis means that DEQ's cost effectiveness determination is based on incomplete information and clearly underestimates the true costs of the proposal, and by extension, the cost effectiveness of the revised SIP.

In addition, the early retirement of the units arguably makes the settlement proposal and the resulting revised SIP much more costly and stringent than the EPA Federal Implementation Plan. Pursuant to Title 27A O.S. Section 1-1-206 - Economic Impact - Environmental Benefit Statement:

A. Each state environmental agency in promulgation of permanent rules within its areas of environmental jurisdiction, prior to the submittal to public comment and review of any rule that is more stringent than corresponding federal requirements, unless such stringency is specifically authorized by state statute, shall duly determine the economic impact and the environmental benefit of such rule on the people of the State of Oklahoma including those entities that will be subject to the rule. Such determination shall be in written form.

B. Such economic impact and environmental benefit statement of a proposed permanent rule shall be issued prior to or within fifteen (15) days after the date of publication of the notice of the proposed permanent rule adoption. The statement may be modified after any hearing or comment period afforded pursuant to Article I of the Administrative Procedures Act.

C. The economic impact and environmental benefit statement shall be submitted to the Governor pursuant to Section 303.1 of Title 75 of the Oklahoma Statutes and to the Legislature pursuant to Section 308 of Title 75 of the Oklahoma Statutes. Such reports submitted to the Governor and to the Legislature shall include a brief summary of any public comments made concerning the statement and any response by the agency to the public comments demonstrating a reasoned evaluation of the relative impacts and benefits of the more stringent regulation.

It does not appear that the DEQ has conducted or submitted this statutorily required Economic Impact – Environmental Benefit Statement. The Revised SIP, once approved through notice and comment rulemaking, will be submitted to the EPA for promulgation, again, after notice and comment, as a final rule. Here, where the ODEQ BART determination includes the retirement of one unit in 2016, and additional controls and then the subsequent retirement of a second unit in 2026, a determination more stringent than the EPA FIP, the DEQ should determine the economic impact of the rule (the Revised State SIP) and the environmental benefit of the rule, on the people of the State of Oklahoma, which includes rate payers that will be affected by the rule.

In summary, it does not appear that DEQ considered the total costs of compliance in its Revised BART Determination, as the cost of replacement capacity and energy was omitted from the analysis. That replacement cost data should be considered in any determination regarding the cost of compliance inherent in the PSO/EPA settlement plan and will not be available until a thorough examination of PSO's amended IRP is accomplished. PSO has stated its intention to submit its amended IRP in early June of this year and hold a technical conference regarding same

on June 18th. The Attorney General submits that it is necessary that a thorough vetting process occur regarding the revised SIP so that accurate cost information can be obtained. For the above-stated reasons, the Attorney General respectfully requests that DEQ delay any decision regarding approval of the revised SIP. This requested delay will allow the DEQ an opportunity to fully consider all relevant cost information before approving the revised SIP.

Comments to Oklahoma Department of Environmental Quality
on Proposed Regional Haze & Transport
State Implementation Plan Revision
05/20/13

The Governor, Office of the Attorney General, Secretary of the Environment, Secretary of Energy, Corporation Commission staff and Oklahoma Sierra Club support American Electric Power/Public Service Company's compliance plan as a common sense approach for complying with federal regulatory safeguards and setting firm dates for retirement of both AEP-PSO coal units.

I support the proposed revision of the Best Available Retrofit Technology (BART) for the AEP-PSO Northeastern Units 3 and 4, which provide for the first coal-burning unit to be phased out by April 16, 2016. The second unit will remain in use with pollution control technology installed by April 16, 2016. Between 2021 and 2026, AEP-PSO will significantly reduce the amount of coal burned at the unit until the plant is decommissioned no later than December 31, 2026.

This option is more cost effective than retrofitting coal units with expensive scrubbers. Continuing to run the outdated, aging plants until 2041 would raise rates for residential customers by 14.3% compared to a projected 11% under PSO's cost-effective plan.

Dangerous sulfur dioxide emissions from the Northeastern power plant near Oologah will be reduced by more than half in 2016 and fully eliminated by 2026.

Oklahomans' health will benefit from cumulative reductions in carbon dioxide, the primary cause of climate disruption, and sulfur dioxide, mercury, nitrogen oxides and other toxins.

To address the visibility impairment at the Wichita Mountains Class I area, under the First Amended Regional Haze Agreement, AEP-PSO will develop a monitoring program to test operating profiles to determine if sulphur dioxide can be successfully removed during normal operations. In the event this is not achieved, I am relieved to read that sulphur dioxide emissions reductions will be obtained through enforceable emission limits or control equipment requirements if necessary to realize the visibility benefits estimated in regional haze modeling.

Coal-fired energy generation is poisoning our water and air, wrecking our health and shortening lives in Oklahoma. The proposed SIP revision for the AEP-PSO Northeastern Units 3 and 4 avoids the risks of expensive investments in outdated technology. It allows AEP-PSO flexibility in transitioning to cleaner energy sources over a reasonable period of time. And it enables Oklahoma to comply with federal regulatory safeguards while ensuring that we will have cleaner energy future

Jody Harlan, Chair
Oklahoma Sierra Club
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May 20, 2013

Oklahoma Department of Environmental Quality
Air Quality Division
P.O. 1677
Oklahoma City, Oklahoma 74010-1677
ATTN: Cheryl E. Bradley

RE: Comments of Quality of Service Coalition
(QOSC) on Oklahoma Department of
Environmental Quality's (ODEQ) Proposed
Regional Haze SIP Revision

Dear Ms. Bradley:

Quality of Service Coalition (QOSC) is an unincorporated association of Oklahoma consumers who primarily receive electric service from Public Service Company of Oklahoma (PSO). The majority of members are located in Northeastern Oklahoma but include members living and working in other areas of Oklahoma served by PSO. Our membership includes realtors, home and commercial builders, trade associations, cities and towns where PSO provides electricity, local banks, businesses and individuals. Our organization is concerned with service quality, the impact of rates on attraction and retention of new and existing businesses and the continued growth of our state.

QOSC is opposed to ODEQ's Proposed Regional Haze SIP Revision and is submitting the following comments to support that position. QOSC strongly suggests that the proposal does not conform to Federal and State statutory and regulatory requirements related to Regional Haze and thus should be rejected as a reasonable approach to implement control technologies to achieve those goals and objectives.

This proposal attempts to amend a previous Oklahoma State Implementation Plan filed by ODEQ in February, 2010, which proposed BART for six generating facilities in Oklahoma. Four of those generating facilities, Sooner 1 and 2 and Muskogee 4 and 5 are owned and operated by Oklahoma Gas and Electric, a public utility doing business

in Oklahoma and Arkansas. The other two generating facilities, Northeast 3 and 4, are owned and operated by Public Service Company of Oklahoma, an affiliate of American Electric Power, which owns electric public utilities operating in Oklahoma, Texas, Louisiana, Arkansas, Indiana, Michigan, Ohio, Kentucky, Virginia and West Virginia.

It is important to point out that the February 2, 2010 ODEQ Regional Haze Implementation Plan Revision filing used "incomplete visibility data for 2001, completed data for 2002-2004 and provisional data for 2005 and 2006. Baseline conditions represent the average of 2002-2004. (See page 16, ODEQ Regional Haze Implementation Plan Revision, February 2, 2010) In addition, ODEQ bases its long-term strategy on "an identified baseline emissions inventory, Base G of the CENRAP inventory for 2002. (Page 37, ODEQ Regional Haze Implementation Plan Revision, February 2, 2010)

ODEQ is required to consider and address the anticipated net effect on visibility resulting from changes projected in point, area, and mobile source emissions by 2018. As explained on Page 91 of the Regional Haze Implementation Plan Revision, February 2, 2010, the changes anticipated to occur will result from population growth, land management evolution, air pollution control, and development of industry, energy and natural resources. There is no indication in the most recently filed [Proposed] Regional Haze Implementation Plan Revision, March 20, 2013, that ODEQ used modeling data that contains updated emissions inventory data. To establish emissions in 2018 from the 2002 inventory, ODEQ, using CENRAP modeling expertise, developed an estimated inventory for 2018. QOSC respectfully suggests that the use of data that is outdated is inappropriate, requires additional data be supplied and would suggest that more current emissions inventory data be used in modeling of regional haze in 2018. The use of new data inserted in the CENRAP model and the results of new modeling information will provide ODEQ and EPA information required by regional haze statutes and rules.

Only recently EPA noted that Arizona Department of Environmental Quality failed to provide the most recent emissions inventory available as required by the Regional Haze Rule in 40 CFR 51.308(d)(4)(v), in addressing its updated Regional Haze submission. Arizona subsequently provided the 2008 emissions inventory. ODEQ should also be required to provide the most recent emissions inventory available to use in creating an estimated inventory for 2018. An updated emissions inventory is essential to the overall determination of BART-eligible sources in Oklahoma and to the determination of sources required to install BART.

The Settlement Agreement incorporated in this Proposal adopts a retrofit and retirement scheme to address future SO₂ emissions from PSO's Northeast 3 and 4 generating facilities. The proposal calls for installation of dry sorbent injection (DSI) and activated carbon injection on one unit (presumably Northeast 3) by 2016 to continue to operate that unit until 2026 and the retirement of the other unit (Presumably Northeast 4) in 2016.

Again, the [Proposed] Regional Haze Implementation Plan Revision filed on March 20, 2013, is inconsistent with the February 2, 2010, Regional Haze Implementation Plan Revision. On page 111, D. Factors for Consideration (1). Source Retirement and Replacement Schedules, ODEQ opined that it considered source retirement and replacement schedules developing its long-term strategy of emissions reductions. ODEQ concluded that it "cannot reliably predict the retirement or replacement of sources and consequently does not rely on source retirement to achieve any reasonable progress goal. Nothing in the [Proposed] Regional Haze Implementation Plan Revision provides the rationale or reasoning for ODEQ's new position on retirement or replacement of sources. Even more interesting is the lack of any information in the March 20, 2013 document addressing replacement of retired generating facilities in 2016 or 2026.

Reasonable progress goals require ODEQ to consider 5 factors in determining a reasonable progress goal. 42 U.S.C. Section 7491(g) (1) provides the five factors that must be considered in determining a reasonable progress goal:

1. Cost of compliance,
2. Time necessary for compliance,
3. Energy effects of compliance,
4. Non-air quality environmental effects of compliance, and
5. Remaining useful life of existing sources

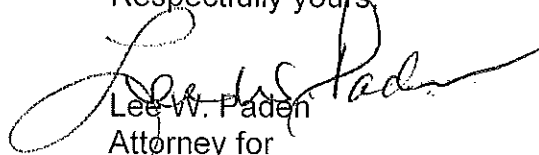
QOSC suggests that factor number 3, if considered at all, did not factor into its consideration the requirement for replacement energy and capacity as existing units are retired. Northeast 3 and 4 currently provides a significant percentage of all energy for PSO customers generated by its own facilities. One reason for this is the low fuel cost associated with operation of those facilities. Replacement energy will almost certainly be supplied by more expensive natural gas generating facilities, probably from Oklahoma Independent Power plants located near Tulsa. The need for replacement energy is quantifiable, the estimated cost of that replacement energy is quantifiable, and those issues will certainly impact the total cost of compliance.

NERC and SPP standards as well as state regulations require every public utility to be able to meet the needs of its customers. PSO provides electric service to more than 535,000 customers in Oklahoma and having the necessary capacity and energy to meet their needs is essential. Northeast 3 and 4 play a significant role in supplying PSO's customers electricity. Even the Settlement Agreement in this case signed by ODEQ, EPA, PSO and the Sierra Club (paragraph 14) recognizes that PSO must comply with all applicable federal, state, and local laws and regulations. Replacement energy for the 490 MW unit retired in 2016 must be immediately available upon retirement and the amount of replacement energy and costs associated with that replacement energy are readily quantifiable. Replacement energy for the 490 MW unit in 2026 is also quantifiable. These costs are necessary costs of compliance and without their inclusion in the review process, ODEQ cannot properly determine if the scheme of retirement suggested in the Settlement Agreement is acceptable.

Other commenter submissions address a number of additional issues. In particular, Oklahoma Industrial Energy Consumers (OIEC) has provided comments for this hearing. QOSC supports those comments and adopts by reference OIEC's written comments submitted on May 17, 2013.

QOSC suggests that the [Proposed] Regional Haze Implementation Plan does not meet the statutory or regulatory requirements necessary for approval of this proposal. QOSC recommends its rejection. In the best interest of Oklahoma customers of PSO, the state of Oklahoma and all Oklahoma citizens, the proposal should be withdrawn by ODEQ.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Lee W. Paden", is written over the typed name.

Lee W. Paden
Attorney for
Quality of Service Coalition



Department of Environmental Quality
Air Quality Division
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677

Via Electronic Mail to Cheryl.Bradley@deq.ok.gov

May 20, 2013

Re: Proposed Regional Haze SIP Revision

To Whom it May Concern:

I write on behalf of Sierra Club and its 2.1 million members and supporters, including more than 3,000 members in Oklahoma, in strong support of the proposed Regional Haze SIP Revision.¹ The SIP fully complies with federal requirements to reduce regional haze and interstate pollution from the Northeastern coal-fired power plant in Oologah, Oklahoma. In addition to protecting scenic views in the region's most treasured parks, the SIP's requirement to retire one Northeastern unit by 2016, along with retrofits and a steady ramp-down of capacity at the other toward retirement in 2026, will have enormous public health benefits. It is also a more cost-effective solution than requiring the installation of expensive scrubbers on both units. For these reasons, Sierra Club urges the Oklahoma Department of Environmental Quality (DEQ) to promptly approve and finalize the SIP.

I. The SIP Revision Protects Our Parks.

In order to protect the "intrinsic beauty and historical and archeological treasures" at national parks, wilderness areas, and other designated "Class I" areas," Congress set a national goal to reduce human-caused haze pollution and achieve natural visibility conditions by 2064.² The Clean Air Act requires states to design an implementation plan to reduce haze from air pollution sources within its borders that cause or contribute to visibility impairment – i.e., hazy views – at any protected area located within or beyond that state's boundaries.

¹ Sierra Club is submitting individual comments from 380 members and supporters under separate cover.

² See H.R. Rep. No.95-294, at 203-04 (1977); See 42 U.S.C. § 7491(a)(1); 40 C.F.R. § 51.308(d)(1)(i)(B).

Haze-forming pollution from the Northeastern plant currently impacts visibility in four popular scenic areas in the region: Wichita Mountains National Wildlife Refuge in Oklahoma, Caney Creek Wilderness and Upper Buffalo Wilderness in Arkansas, and Hercules Glade Wilderness in Missouri. The Wichita Mountains is the oldest managed National Wildlife Refuge in the U.S. Fish and Wildlife system. It was designated as a forest preserve in 1901 and became a NWR in 1903. Scenic mountains and prairies make up the refuge's 59,020-acre landscape.³ In 2011, over 118,000 people visited the refuge for enjoyment and recreation.⁴ Hercules Glades, Caney Creek and Upper Buffalo are also valuable units of the national forest system. Hercules Glade includes some of "the most scenic and unique country in the Midwest," while Caney Creek and Upper Buffalo possess breathtaking views of the region from ridge tops and steep slopes.⁵ Unfortunately, the views at these recreational areas are suffering from pollution from the region's coal-fired power plants. Visitors at Caney Creek can experience views up to 81 miles on a clear air day, but on hazy days this view is reduced to just 17 miles.⁶ If visibility were at natural conditions, people would be able to see up to 170 miles into the distance.⁷ In Upper Buffalo, visitors can see only 18-78 miles into the distance, but under natural visibility conditions they would be able to see between 79 and 171 miles.⁸

Current emissions of haze-forming pollution from the Northeastern Units 3 and 4 amount to approximately 32,000 tons per year sulfur dioxide (SO₂) and more than 14,000 tons per year nitrogen oxides (NO_x).⁹ To reduce SO₂ emissions, the SIP Revision requires Public Service Company of Oklahoma (PSO) to retire one unit by April 16, 2016 and retrofit the other with Dry Sorbent Injection by the same date.¹⁰ PSO must reduce the remaining unit's capacity significantly starting in 2021, and retire the unit no later than December 31, 2026. The planned replacement power is a combination of cleaner resources: purchased power from an existing combined cycle natural gas plant, energy efficiency, and demand response programs.¹¹

Implementation of the SIP will drastically reduce both SO₂ and NO_x emissions by 2016 and fully eliminate them by 2026. By April 16, 2016, assuming an 85% capacity factor

³ U.S. Fish and Wildlife, *Wichita Mountains Wildlife Refuge*, http://www.fws.gov/refuge/Wichita_Mountains/about.html.

⁴ Phone interview between National Parks Conservation Association staff and Wichita Mountains Visitor Center representative (July 24, 2012).

⁵ United States Forest Service, *Hercules Glades Wilderness*, <http://www.fs.usda.gov/recarea/mtnf/recreation/hiking/recarea/?recid=21754&actid=51>; See Univ. of Montana, College of Forestry, www.wilderness.net.

⁶ U.S. Dep't of Agriculture, Caney Creek Wilderness – Natural Background Visibility, http://www.fs.fed.us/air/technical/class_1/wilds.php?recordID=10.

⁷ *Id.*

⁸ *Id.*

⁹ Oklahoma Regional Haze SIP Revision (Mar. 20, 2013), at 6 (Table II-1).

¹⁰ As EPA has already approved the portion of the Oklahoma SIP that addresses NO_x, the SIP Revision properly focuses on SO₂.

¹¹ Direct Testimony of Steven L. Fate on Behalf of Public Service Company of Oklahoma & Direct Testimony of Scott C. Weaver on Behalf of Public Service Company, Oklahoma Corporation Commission, Cause No. PUD 2012000054 (Sept. 26, 2012).

at the unit that continues operating past that date, emissions will be slashed to 7,111 tons per year SO₂ and 2,667 tons per year NO_x.¹² Particulate matter emissions, which also contribute to haze and public health problems, will also see a drastic reduction.

Clearing the haze at these parks will both protect the health of those who recreate there and promote local tourism by decreasing the number of days when pollution impairs scenic views. DEQ's BART Determination predicts that the settlement agreement will reduce visibility impairment caused by the plant's SO₂ and NO_x pollution by approximately 80% in each of these regions compared with current conditions.¹³ For example, instead of contributing to an average of 1.5 "deciviews"¹⁴ of visibility impairment at Wichita Mountains, as it does now, after the retirement of one unit and installation of SO₂ and NO_x controls on the remaining unit, it will cause only .295 deciviews of impairment. Likewise, the reduction of nitrogen oxides (NO_x) will result in 76 fewer days each year in which the Northeastern plant is contributing to visibility impairment in the Wichita Mountains, compared with the baseline, and 95 fewer days of impairment in Caney Creek Wilderness.¹⁵

The improvements in visibility attributable to the SIP Revision have a tangible economic benefit. Sierra Club members and other Americans visit national parks, national forests, and wilderness areas to recreate and see amazing views. In doing so, they contribute substantially to the American economy. In 2010, activities associated with national parks and other Department of Interior lands provided more than 2.2 million jobs, which generated \$377 billion in economic activity.¹⁶ National Wildlife Refuges and other US Fish and Wildlife Service land management contributed over \$4 billion to the economy and supported over 32,000 jobs in 2010.¹⁷ According to the Department of Agriculture, national forest land recreation visitors spend nearly \$13 billion each year in rural communities surrounding national forests and wilderness areas.¹⁸ This spending results in over \$14 billion to the GDP and supports over 224,000 full and part time jobs.¹⁹ As scenic views are an important part of the visitor experience at these parks, clearing away human-caused haze — allowing for visibility exceeding 170 miles in some areas — will serve to make them even more attractive destinations, with the corresponding economic benefit. Visitors to

¹² *Id.* at 8 (Table II-3).

¹³ *Id.* at 8, Table II-4.

¹⁴ "The deciview metric provides a scale for perceived visual changes over the entire range of conditions, from clear to hazy. Under many scenic conditions, the average person can generally perceive a change of one deciview. The higher the deciview value, the worse the visibility. Thus, an improvement in visibility is a decrease in deciview value." *U.S. EPA, Regulatory Impact Analysis for the Final Clean Air Visibility Rule or the Guidelines for Best Available Retrofit Technology (BART) Determinations*, EPA-452/R-05-004 (June 2005).

¹⁵ *Id.* at 3-1.

¹⁶ Southwick Associates, *The Economics Associated with Outdoor Recreation, Natural Resources Conservation and Historic Preservation in the United States*, Oct. 10, 2011 at 4, available at http://www.trcp.org/assets/pdf/The_Economic_Value_of_Outdoor_Recreation.pdf.

¹⁷ *Id.*

¹⁸ U.S. Forest Service, *National Visitor Use Monitoring Results USDA Forest Service National Summary Report, 2005-2009*, at 2, available at http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2009.pdf.

¹⁹ *Id.*

National Wildlife Refuges, Wilderness Areas, and National Parks consistently rate visibility and clear scenic vistas as one of the most important aspects of their experience.²⁰

Compared to EPA's federal implementation plan ("FIP"), which the SIP Revision will replace, the SIP Revision provides more flexibility for PSO to comply with its obligations under the Clean Air Act's haze provisions, but does not compromise public health or visibility. The FIP requires PSO to meet an SO₂ emission limit of .06 lbs/mmBtu, consistent with emissions reductions achievable with Dry Flue Gas Desulfurization units with Spray Dry Absorbers, by January 27, 2017 (five years after the rule's effective date). While benefits to visibility as of January 27, 2017 would be slightly greater under the FIP, the advantage is temporary. The FIP scenario may have somewhat lower impacts for several years, but the SIP Revision better achieves the overall goals of the Regional Haze program because emissions from both units will be completely eliminated by 2026.²¹ Under the FIP scenario, both units would be permitted to continue operating and polluting beyond 2026 and would likely do so until the plants are no longer economical to operate, regardless of the health or visibility impacts. By 2026, Northeastern's contribution to haze in the region's parks will be zero under the SIP Revision whereas under the FIP scenario the plants would continue to contribute to more than .2 deciviews of impairment (at much greater cost).

In fact, the benefits of the SIP Revision for visibility as compared to the FIP are likely understated in DEQ's analysis. DEQ compares emission rates with DSI and NO_x limits of .15 lb/mmBtu on one unit and the other unit's retirement as of April 16, 2016 with the dry scrubber/SDA and the same NO_x limit as of December 31, 2017 pursuant to the FIP. *See* Revised BART Determination, pp. 7-10. This has several implications for the analysis. First, DEQ did not evaluate the likely reductions in visibility impairment as the second unit ramps down capacity between 2016 and 2026, thereby reducing emissions. As a result, it is unclear how long the FIP scenario would hold even its small advantage in terms of visibility improvements. Additional modeling taking into account the emissions reductions after 2016 would provide further support for the SIP Revision. Another advantage of the SIP Revision is that it requires an earlier implementation of lower NO_x emission limits than in the original SIP or EPA's FIP. *See* Revised BART Determination at 12. As noted by DEQ, "This early implementation schedule reducing emissions by 43% will provide previously unanticipated improvements in visibility as well as reductions in local formation and interstate transport of ozone." DEQ did not compare the reductions in visibility impairment during the three years from December 31, 2013, when the SIP Revision begins to require reductions, to January 2017, when the FIP would have done so. Similarly, the SIP Revision deadline for SO₂ reductions of April 16, 2016 is 8.5 months earlier than the January 2017 FIP deadline, leading to an additional reduction of 26,700 tons of SO₂. DEQ did not take into account these reductions when comparing the visibility benefits of the SIP Revision with those of the FIP.

Overall, the SIP Revision is the less polluting option. DEQ calculates that due to the decreased capacity utilization and early shutdown schedule, cumulative SO₂ and NO_x

²⁰The Clean Air Task Force, *Out of Sight: Haze in Our National Parks*, Sept. 200, at 2, available at http://www.catf.us/resources/publications/files/Out_of_Sight.pdf.

²¹ Supplemental BART Determination Information at 4-7.

emissions from Northeastern Units 3 and 4 will ultimately amount to only 36% of the emission that could be emitted under the FIP. *See Revised BART Determination at 12.* This approach is consistent with Congress's goal of eliminating human-caused haze by 2064, moving Oklahoma toward that goal more quickly than would the FIP.

II. The SIP Revision Protects Our Health.

Pollutants that cause visibility impairment also harm public health. NO_x is a precursor to ground level ozone, which is associated with respiratory diseases, asthma attacks, and decreased lung function. In addition, NO_x reacts with ammonia, moisture, and other compounds to form particulates that can cause and worsen respiratory diseases, aggravate heart disease, and lead to premature death.²² Similarly, SO₂ increases asthma symptoms, leads to increased hospital visits, and can form particulates that aggravate respiratory and heart diseases and cause premature death.²³ Both these pollutants contribute to formation of fine particulate matter (PM). PM can penetrate deep into the lungs and cause a host of health problems, such as aggravated asthma, chronic bronchitis, and heart attacks.²⁴ By drastically reducing these pollutants and requiring the eventual retirement of the Northeastern plant, the SIP Revision will have significant public health benefits.

The Clean Air Task Force, a not-for-profit advocacy and research organization, commissioned a study by Abt Associates to quantify death and other health effects from coal-fired power plants' PM pollution. The study's conclusions for the Northeastern plant are reproduced below. Each number represents the impact on an annual basis.

Northeastern Rogers County, Oklahoma	
Deaths:	62
Heart Attacks:	94
Asthma Attacks:	1,100
Hospital Admissions:	44
Chronic Bronchitis:	38
Asthma ER Visits:	67

²² EPA, Health – Nitrogen Dioxide, <http://www.epa.gov/air/nitrogenoxides/health.html> (last visited Apr. 1, 2011).

²³ EPA, Health – Sulfur Dioxide, <http://www.epa.gov/air/sulfurdioxide/health.html> (last visited Apr. 1, 2011).

²⁴ EPA, Health & Environment – Particulate Matter, <http://www.epa.gov/air/particulatepollution/health.html> (last visited Apr. 1, 2011); *National Ambient Air Quality Standards for Particulate Matter: Final Rule*, 78 Fed. Reg. 3086, 3088 (Jan. 15, 2013), available at <http://www.gpo.gov/fdsys/pkg/FR-2013-01-15/pdf/2012-30946.pdf>. (“EPA is revising the annual PM_{2.5} standard by lowering the level from 15.0 to 12.0 mg/m³ so as to provide increased protection against health effects associated with long-and short-term exposures.... This action provides increased protection for children, older adults, persons with pre-existing heart and lung disease, and other at-risk populations against an array of PM_{2.5}- related adverse health effects that include premature mortality, increased hospital admissions and emergency department visits, and development of chronic respiratory disease.”)

Source: http://www.catf.us/fossil/problems/power_plants/existing/map.php?state=Oklahoma.

By dramatically reducing the PM precursors SO₂ and NO_x, and directly emitted PM, the SIP revision will save lives and reduce hospital visits and asthma attacks.

The Northeastern plant's NO_x emissions, and their contribution to ozone, are particularly problematic for the region's efforts to maintain healthy air quality levels. Tulsa has recently struggled with numerous "ozone-alert" days during the summer season. EPA is considering revising the 8-hour ozone National Ambient Air Quality Standard (NAAQS) from 75 ppb down to 60-70 ppb. EPA has stated that it will propose the revision in 2013 and issue a final rule in 2014. EPA predicts that if the NAAQS for ozone is revised to 65 ppb, the Tulsa metropolitan area will fall out of attainment.²⁵ A "nonattainment" designation could have significant economic impacts as Tulsa is forced to find ways to cut existing emissions and limit new emissions-causing development. As DEQ has noted, the NO_x reductions from the SIP Revision will help address local formation and interstate transport of ozone whereas "the FIP scenario provides no further improvement in ozone." Revised BART Determination at 11.

Northeastern's SO₂ emissions also threaten to cause exceedances of federal air quality standards. Sierra Club and EPA Region 6 have both conducted air dispersion modeling showing that the plant's emissions contribute to ambient SO₂ levels that exceed the 1-hour federal standard.²⁶ The SIP Revision will address this problem by dramatically reducing SO₂ emissions.²⁷

In addition to SO₂, NO_x, and PM, Northeastern releases approximately 210 pounds of mercury to the environment each year.²⁸ Atmospheric deposition of one gram of mercury is enough to contaminate fish in a 20-acre lake.²⁹ The 210 pounds produced by Northeastern each year amounts to around 95,000 grams. The SIP Revision will drastically reduce these harmful releases by 2016 and fully eliminate them by 2026.

²⁵EPA, *Counties Projected to Violate Primary 8-hour Ground-Level Ozone Standard in 2020*, at <http://www.epa.gov/glo/pdfs/CountyOzoneLevels2020primary.pdf>.

²⁶ *Preliminary 1-Hour SO₂ Modeling of Some Coal-Fired EGUs in Oklahoma: Preliminary Results*, EPA Region 6 Air Modeling Team (2011); Letter from A. Issod, Sierra Club to E. Terrill, Air Quality Division Director, attaching modeling report of C. Sears (June 3, 2011).

²⁷ Sierra Club's air dispersion modeling for the Northeastern plant demonstrated that the Northeastern plant's emissions causes ambient air concentrations of SO₂ that are significantly higher than the 2010 1-hour SO₂ NAAQS (259.3 ug/m³, compared with the NAAQS of 196 ug/m³). On the assumption that ambient air concentrations correlate to emissions on a roughly linear basis, eliminating half of the plant's hourly SO₂ emissions by 2016 should resolve this problem.

²⁸ See EPA, Toxic Release Inventory, TRI Explorer, at http://iaspub.epa.gov/triexplorer/tri_release.facility (input Oklahoma/Rogers County/mercury compounds/all industries).

²⁹ Minnesota Pollution Control Agency, Michigan Dep't of Natural Resources, Wisconsin Dep't of Natural Resources, "Mercury in the Environment: The Waste Connection," 1995 (discussed at <http://www.newmoa.org/prevention/mercury/mercurylake.pdf>).

As discussed further below, the Clean Air Act and the regulations governing DEQ's BART determination instruct DEQ to consider the "non air-quality environmental impacts," of emissions of the pollutant in question. 70 Fed. Reg. 39,104, 39,169 (July 6, 2005). "Such environmental impacts include solid or hazardous waste generation and discharges of polluted water from a control device." *Id.* Accordingly, DEQ can properly consider that the SIP Revision will ensure that all of the human health and environmental impacts of coal combustion will be addressed by 2026, not just selected air emissions. Coal-fired power plants produce huge amounts of coal combustion waste, or coal ash. Laden with heavy metals and other harmful toxics known to contaminate water supplies, these wastes cause injury and death to livestock and wildlife, and threaten human health with birth defects, cancer, and organ and neurological damage. The Northeastern plant currently disposes of its waste coal ash (more than 200,000 tons of it in 2011) by putting it into an unlined (or "clay-lined") landfill. This natural barrier does not adequately protect against groundwater contamination.³⁰ A 2011 review of water samples from groundwater wells contaminated by coal ash from the Northeastern plant revealed that levels of chromium, a cancer-causing metal, were more than four times higher than the federal drinking water standard.³¹

Wastewater discharge from coal-fired power plants, particularly those with SO₂ scrubbers, also poses major environmental and public health problems. Scrubbers at coal-fired power plants have the unfortunate consequences of transferring air pollution to water pollution if not properly treated.³² EPA states: "More than 23,000 miles of rivers and streams are damaged by steam electric plant discharges, which include arsenic, mercury, lead, boron, cadmium, selenium, chromium, nickel, thallium, vanadium, zinc, nitrogen, chlorides, bromides, iron, copper and aluminum. For example, each year nearly 65,000 pounds of lead and 3,000 pounds of mercury are discharged, leading to lowered IQs among children exposed to these pollutants via drinking water or by eating fish. Many of these toxic pollutants, once in the environment, remain there for years. Additionally, each year nearly 80,000 pounds of arsenic is released into surface waters, increasing the risk of cancers and other health effects in humans exposed to these pollutants through drinking water and by eating fish."³³

³⁰ EPA, *Frequent Questions: Coal Combustion Residues (CCR) - Proposed Rule*. (Available at <http://www.epa.gov/wastes/nonhaz/industrial/special/fossil/ccr-rule/ccrfag.htm#8>.) ("EPA's risk assessment suggests, and damage cases confirm, that the management of CCRs in unlined and clay-lined landfills and surface impoundments may present risks to human health and the environment through leaching. For landfills and surface impoundments the primary concern is cancer risk from arsenic in drinking water. Surface impoundments also showed high non-cancer risks from cobalt and nitrate/nitrite in drinking water.")

³¹ Lisa Evans, Earthjustice, et al., *EPA's Blind Spot: Hexavalent Chromium in Coal Ash* (Feb. 2011), p. 7, available at <http://www.psr.org/resources/epas-blind-spot-hexavalent-chromium-coal-ash.html>.

³² See *Cleansing the Air at the Expense of Waterways*, The New York Times (Oct. 12, 2009), at http://www.nytimes.com/2009/10/13/us/13water.html?_r=4&ref=us (describing how scrubber retrofits on coal-fired power plants have lead to increased water pollution)

³³ EPA Fact Sheet: Proposed Effluent Limitation Guidelines & Standards for the Steam Electric Power Generating Industry, EPA - 821-F-13-002 (April 2013).

By requiring the retirement of one coal-burning unit in 2016 and the other by 2026, the SIP Revision will reduce both the production of dangerous coal ash that leaks into groundwater supplies and the discharge of pollutants in wastewater.

III. The SIP Revision Will Conserve Water Resources.

The SIP Revision's impact on the state's dwindling water resources is also worth noting in light of the extreme drought conditions facing Oklahoma, and DEQ's mandate to consider nonair environmental impacts. In response to Sierra Club data requests in proceedings before the Oklahoma Corporation Commission, PSO has estimated that the increase in water consumption at the Northeastern plant if it were to add dry scrubbers to both units would be at least 65 times greater than with a retrofit of ACI and DSI at one unit pursuant to the SIP Revision.³⁴ Under continued drought, PSO's daily need for water resulting from scrubber retrofits could increase the potential for conflict with other needs in the Tulsa area. The Northeastern units currently intake water from the City of Tulsa, and the surrounding area includes a variety of farms and ranches. As a result of the SIP revision, water currently used by one unit will be released for other uses by 2016, and after 2026, the units will no longer demand water resources. Sierra Club supports a plan that will ease pressure on the state's water supplies.

IV. The SIP Revision is Less Costly Than Requiring Scrubbers.

Due to its agreement to phase out the Northeastern units instead of investing in expensive new flue gas desulfurization equipment (scrubbers) at both units, PSO estimates that the cost-effectiveness in terms of dollars per ton of SO₂ removed is \$942/ton for the SIP Revision compared with \$1,544/ton under the FIP.³⁵ DEQ similarly estimates that the cost per ton reduction for DSI is \$1,005/ton compared with \$1,544/ton for scrubbers. Sierra Club has not evaluated the company's and DEQ's analysis in detail but agrees that the SIP Revision is more cost-effective – and, indeed, less costly overall.

Because DEQ is charged only with revising the SIP as it pertains to BART for SO₂, it was appropriate for DEQ to consider the cost of control per removal of a ton of SO₂. The scope of this cost analysis, focusing on the direct control costs for each type of emissions control (DSI or scrubbers) properly follows the mandatory federal guidelines for BART Determinations. These guidelines instruct DEQ to “(1) Identify the emissions units being controlled, (2) Identify design parameters for emission controls, and (3) Develop cost estimates based upon those design parameters.” 70 Fed. Reg. at 39,166. The Guidelines further instruct DEQ to consider estimates of capital and annual costs for the “control equipment” or the “control technology.” *Id.*

As DEQ complied with the above guidelines (discussed further below), DEQ's review of costs in the BART analysis is complete and legally sufficient. However, because some

³⁴ Oklahoma Corporation Commission, Cause No. 201200054, PSO Response to Sierra Club Data Request 5-9 (Dec. 20, 2012) (attached hereto as Exhibit 1) (Controls pursuant to EPA settlement will consume approximately 11,250 gallons of water per day, compared with the DFGD option, which would consume approximately 737,000 - 805,000 gallons of water per day for two units).

³⁵ *Id.* at 4-4.

interested parties may comment on overall cost of the SIP Revision and its impact on electric rates, Sierra Club briefly addresses this issue as well to provide DEQ, and the public, with a complete picture.

The SIP Revision not only permits PSO to avoid the high cost of installing and operating scrubbers; by providing for the retirement of a unit in 2016, it also assures that PSO will avoid the costs of other upcoming regulations that would require that unit to internalize the costs of its air, water, and coal ash pollution and other harm to the environment. Pursuant to the SIP Revision, PSO will avoid costs associated with an array of future regulations at one or both units, including:³⁶

- ***Coal Combustion Residuals.*** The EPA proposed two alternative rules on June 21, 2010, but has not yet finalized either rule. The Northeastern facility's coal ash landfill has only an "in-situ clay liner," meaning that the landfill currently does not have a synthetic liner to protect against toxics that may be leaching into groundwater or surface water and causing risks to human health.³⁷ Regardless of how the rule is finalized, it is reasonable to expect that to continue operating beyond 2016, Northeastern would have to address this issue. To convert its landfill to appropriately handle ash waste could cost \$30 million or more.³⁸
- ***Effluent Limitations Guidelines.*** EPA issued proposed effluent limitations for coal-fired power plants in April 2013. The proposed rule would establish new requirements for wastewater streams from FGD (scrubbers), fly ash, bottom ash, and flue gas mercury control, all of which would be present at the Northeastern units if they continued to operate. EPA has proposed four options, with varying degrees of control for each waste stream, including specific limits for certain pollutants in the FGD waste stream, dry-handling (zero discharge) of fly ash or bottom ash, or both. This rule could pose significant costs for the Northeastern units were they to continue to operate, especially because scrubbers create enormous amounts of polluted wastewater.
- ***Revised NAAQS for Ozone.*** As noted above, EPA predicts that Tulsa will be out of attainment in 2020 if the ozone standard is revised to 65 ppb or lower. Oklahoma would need to further reduce regional NOx emissions, which could ultimately require installation of expensive Selective Catalytic Reduction units at the Northeastern units. DEQ estimated in its original BART determination for Northeastern that the capital cost of installing SCR at the Northeastern units would be \$290 million, with an annual cost of control (including both capital and operational costs) amounting to approximately \$48 million.³⁹
- ***One-Hour SO₂ Primary NAAQS.*** As noted above, the one-hour SO₂ standard poses significant challenges for coal-fired power plants. A study by Burns & McDonnell

³⁶ Although PSO may have to implement changes at the unit that continues to operate until 2026, its costs will be lower than if both units continued to operate.

³⁷ See *supra* note 30.

³⁸ North American Reliability Council, *2010 Special Reliability Assessment Scenario: Resource Adequacy Impacts of Potential U.S. Environmental Regulations*, October 2010, p. 56.

³⁹ DEQ, Air Quality Division, Northeastern BART Application Analysis (Jan. 19, 2010), Table 5.

concluded that “both scrubbed and unscrubbed boilers will have difficulty complying with the new one-hour SO₂ NAAQS during short-term high emissions.”⁴⁰ Further reducing SO₂ emissions, even after installing scrubbers, would require additional investments not necessary under the SIP Revision.

- *Cross State Air Pollution Rule.* The EPA has a statutory duty to require states to address emissions that “contribute significantly to nonattainment in, or interfere with maintenance by, any other State with respect to [the NAAQS].”⁴¹ As the NAAQS get tighter, there is greater likelihood that an upwind state will contribute to nonattainment in a downwind state. As a result, although the 2010 version of CSAPR was vacated by the D.C. Circuit, future regulations on interstate air pollution implemented to comply with the D.C. Circuit’s opinion could be even stricter. The regulations will have to address lower annual standards for fine particulate matter (PM_{2.5}), which were finalized in January 2013, as well as updated ozone standards, which are expected to be finalized in 2014.⁴² By agreeing to phase out its coal units, PSO likely avoids significant costs of this future rule.
- *Greenhouse Gas New Source Performance Standards for Existing Units.* The EPA has indicated that it plans to issue rules to address greenhouse gases from existing coal-fired power plants. Although EPA has not determined a specific timeline, its statutory duty to do so will be triggered when it finalizes its proposed regulations for new units, now expected in March 2013. (See Clean Air Act, Section 111(d), which requires EPA to prescribe regulations addressing any air pollutant “to which a standard of performance under this section would apply if such existing source were a new source”). The costs of compliance could be significant. A 2012 study by Synapse Energy Economics reports that, in 55 publicly available forecasts of allowance prices by electric utilities, the forecasted price for 2030 ranges from \$10/ton (2012\$) to \$80/ton (2012\$).⁴³

By transitioning to cleaner alternatives than coal, PSO will avoid these and other future regulatory costs, all of which could have been passed on to ratepayers. These cost savings are in addition to the millions of dollars saved by installing DSI instead of scrubbers.

V. The SIP Revision is Consistent with the State Energy Plan.

Although not directly relevant to DEQ’s statutory obligations, Sierra Club also supports the SIP Revision because it is consistent with the State of Oklahoma’s energy

⁴⁰ Robynn Andracsek, et al, Burns & McDonnell, “Flue Gas Desulfurization-Equipped Coal-Fired Power Plants: Will They Comply with the 1-Hour National Ambient Air Quality Standard for Sulfur Dioxide?”, TECHBriefs 2011 No. 2, p. 2, available at <http://www.burnsmcd.com/Resources/Article/Flue-Gas-Desulfurization-Equipped-Coal-Fired-Power-Plants>.

⁴¹ See Clean Air Act Section 110(a)(2)(d)(i).

⁴² *National Ambient Air Quality Standards for Particulate Matter: Final Rule*, 78 Fed. Reg. 3086 (Jan. 15, 2013), available at <http://www.gpo.gov/fdsys/pkg/FR-2013-01-15/pdf/2012-30946.pdf>.

⁴³ Synapse Energy Economics, Inc., *2012 Carbon Dioxide Price Forecast*, October 4, 2012, p. 22, available at <http://www.synapse-energy.com/Downloads/SynapseReport.2012-10.0.2012-CO2-Forecast.A0035.pdf>.

plan. The state energy plan prioritizes the increased use of Oklahoma's energy resources such as wind and natural gas, and protection of public health and the environment.⁴⁴ Oklahoma is an exporter of both natural gas and wind, but a major importer of coal, including the coal burned by the Northeastern units. In 2012, Northeastern imported more than 3.6 million tons of coal from mines in Wyoming and other out-of-state mines at a cost of more than \$75 million.⁴⁵ Adding scrubbers would have continued those imports, requiring rail transport of large amounts of coal. The SIP Revision will instead encourage use of Oklahoma resources and the elimination of Northeastern's coal imports by 2026.

Transitioning from coal to gas, wind, energy efficiency, and demand response also has significant benefits for the overall reliability of the grid. As the amount of wind in Oklahoma and the Southwest Power Pool (SPP) rises, fossil generation will need to ramp production up and down more frequently, and to shut down for various periods of time during high wind production. Switching to natural gas, wind, energy efficiency and demand response, result in resources better suited to integrate with variable wind generation, both technically (since coal plants generally ramp more slowly than gas plants and often require longer periods between starts and stops) and economically (since the large investment in scrubbing and other environmental compliance will be partially stranded if coal units are often ramped down to accommodate wind energy, while gas plants would avoid their fuel costs).

American Electric Power (AEP), PSO's parent company, has acknowledged that this transition to cleaner, local, more flexible fuel sources will impact its employees currently employed in the coal sector. Sierra Club shares the concern that the transition occur in a way that is sensitive to the employees and communities affected by plant retirements, not least because Sierra Club members also live in these communities. As the largest power company in the country, AEP has extraordinary resources to help redeploy its coal sector employees, and has committed to doing so.⁴⁶ Oklahoma will be in need of workers in the power sector throughout the state's transition away from coal. New jobs will be created in transmission line construction, wind energy, solar power, and energy efficiency. The gradual nature of the PSO plan allows for PSO and the overall state economy to make the transition to a power fleet without coal in a way that allows for gradual placements of workers into new positions within the power industry. AEP notes that attrition across its company may create opportunities; the number of employees may increase at units where environmental controls are retrofit; and potential acquisition (purchase or construction) of replacement power may create openings. AEP plans to provide a variety of assistance programs, from advising its hiring managers when applicants are from impacted facilities

⁴⁴ Governor Mary Fallin & Secretary of Energy Michael Ming, Oklahoma First Energy Plan (2011), at 3, 5, *available at* <http://www.ok.gov/governor/documents/Governor%20Fallin's%20Energy%20Plan%20-%20Jan%202012.pdf>

⁴⁵ SNL Financial (based on Energy Information Administration Form EIA-923 filings).

⁴⁶ *See* AEP, Human Resources for Employees, <http://www.aep.com/community/PlantRetirements/HumanResourcesProgramsForEmployees.aspx> ("AEP will do everything it can to assist employees whose jobs will be eliminated due to the premature retirements of generating units."; listing wide variety of programs)

to providing education assistance programs.⁴⁷ While these issues are not factors that DEQ may consider in its BART analysis, Sierra Club believes they are important issues for the public to be aware of.

VI. The SIP Revision Satisfies DEQ's Legal Obligations Under the Clean Air Act.

The Clean Air Act charges each state with the initial responsibility for preparing a Regional Haze SIP, but grants EPA with oversight authority. This oversight ensures that each State's SIP considers each statutory factor in a way that is rational, supported by the evidence, and consistent with nationwide standards. EPA approved the majority of the Regional Haze SIP submitted by Oklahoma in 2010, but disapproved of Oklahoma's approach to SO₂ BART. Oklahoma's BART determination did not require any coal-fired power plants to actively reduce SO₂ emissions, requiring them only to continue using low-sulfur coal. Finding that Oklahoma had not properly evaluated the cost-effectiveness of scrubbers according to federal guidelines, EPA issued its own plan for SO₂ emissions and required that six coal-fired units meet an emissions limit of .06 lbs/mmbtu, either by installing dry flue gas desulfurization units or switching to natural gas.

The SIP Revision is a practical and legally sufficient response to EPA's disapproval of Oklahoma's BART determinations for sulfur dioxide for the Northeastern units.⁴⁸ Sierra Club agrees with DEQ that, with respect to the Northeastern units, the SIP Revision also addresses the state's obligation to address the visibility impacts of pollution transported to other states. The SIP Revision will also contribute to the state's "reasonable progress toward meeting the national goal" of eliminating human-caused visibility impairment by 2064. 42 U.S.C. § 7491(b)(2).

In making a BART determination, the Clean Air Act requires states to consider (1) the costs of compliance; (2) the energy and nonair quality environmental impacts of compliance; (3) any existing pollution control technology in use at the source; (4) the remaining useful life of the source; and (5) the degree of improvement in visibility which may reasonably be anticipated to result from the use of such technology. 42 U.S.C. § 7491(g)(2); 40 C.F.R. 51.308(e)(1)(ii).

Pursuant to the BART regulations issued by EPA, the first step before evaluating costs is identifying technically feasible control options. DEQ evaluated two control options: installing Dry FGD with Spray Dry Absorber on both units (the FIP scenario) and installing DSI on one unit and shutting down the other by 2016 (the settlement scenario). DEQ properly took into account one unit's retirement as part of the control scenario. The statute itself instructs states to contemplate "the remaining useful life of the source," 42 U.S.C. § 7491(g)(2), and EPA's BART Guidelines acknowledge that a unit may "agree to shut down" prior to the statutory deadline for BART controls. 70 Fed. Reg. 39,104, 39,127 (July 6, 2005). It is well within DEQ's discretion, and makes good practical sense, to take into account PSO's enforceable commitment to retire one unit by 2016 in comparing costs. The

⁴⁷ See AEP, Human Resources for Employees,

<http://www.aep.com/community/PlantRetirements/HumanResourcesProgramsForEmployees.aspx>.

⁴⁸ Because Oklahoma continues to dispute appropriate BART determination for the four remaining units, owned by Oklahoma Gas & Electric, this SIP Revision does not fully displace the FIP.

BART Guidelines require that if the “date the facility permanently stops operations [. . .] affects the BART determination, this date should be assured by a federally- or State-enforceable restriction preventing further operation.” 70 Fed. Reg. at 39,169. DEQ has satisfied this requirement by entering into an “enforceable administrative order” with AEP/PSO. Revision at 6 & Appendix III. This order must be incorporated as part of the SIP, and enforceable by citizens, the state, and EPA, to assure compliance with the Act.

The next step is calculating the annual costs for each scenario. Sierra Club did not conduct a detailed evaluation of DEQ’s cost assumptions, but supports DEQ’s approach of using a methodology consistent with EPA’s Air Pollution Control Cost Manual and EPA’s analysis supporting the FIP.⁴⁹

Next, the state must evaluate cost-effectiveness, or the cost per ton of SO₂ reduced. Unlike many BART analyses, which would compare control technologies on a unit operating at the same capacity level for the same period of time, DEQ was faced here with two very different scenarios, in that the controlled unit will operate only until 2026 and will steadily ramp down capacity starting in 2021. To make an “apples-to-apples” comparison as required by the BART regulations, DEQ considered emissions reductions with the DSI option as if the controlled unit would consistently operate at 85% capacity through 2026. Revised BART Determination at 6-7. Moreover, because the unit will cease operating in 2026, DEQ was careful to annualize the DSI option’s costs over 10 years instead of 30, as for DFGD. *Id.* at 6. Pursuant to this approach, DEQ concluded that the DSI option, at \$1005/ton reduced, is more cost-effective than DFGD, at \$1,544/ton. *Id.* at 7. Taking into account the capacity reductions, the gap is larger. According to the company’s estimate, 26,558 tons of SO₂ will be removed under the DSI/shutdown scenario through 2026, resulting in a cost-effectiveness of \$942/ton. Supplemental BART Determination Information, Appendix A, at 2.

EPA also instructs states to evaluate “incremental cost-effectiveness,” or the cost of each additional ton removed by the more expensive option that achieves greater reductions.⁵⁰ The incremental cost-effectiveness of the DFGD option is \$4,718/ton in the first year. Taking into account additional reductions in SO₂ as the unit decreases its capacity utilization, the incremental cost-effectiveness worsens to \$7,794/ton. *See* Supplemental BART Determination Information, Appendix A, at 2-3. As noted in the BART regulations, “[o]f course, there may be other differences between these options, such as, energy or water use, or non-air environmental effects, which should also be considered in selecting a BART technology.” 70 Fed. Reg. at 39,167.

The state is next instructed evaluate these “other differences,” including whether each control option results in energy penalties or benefits. DEQ did not evaluate the differences in energy use between the two options in detail, but notes that energy consumption will be reduced by half as a result of the shutdown of one unit. DEQ also could

⁴⁹DSI may have greater than zero landfill costs, contrary to DEQ’s analysis. However, even if landfill costs were included, the DSI/shutdown scenario would be more cost-effective than DFGDs.

⁵⁰ (Total Annualized Cost for Option 1 – Total Annualized Cost for Option 2) ÷ (Annual Emissions for Option 1 – Annual Emissions for Option 2). 70 Fed. Reg. at 39,167.

have considered the greater energy requirements of DFGD technology as compared to DSI as a factor supporting its BART selection.

Next, the state must consider “non-air quality environmental impacts.” This is a broad category, including “relative quantities of water used and water pollutants produced and discharged as result of the use of each alternative emission control system,” and “where possible, . . . the effect on ground water and . . . local surface water quality parameters.” 70 Fed. Reg. at 39,169. The state may also consider the “quality and quantity of solid waste . . . that must be stored and disposed of or recycled,” the “irretrievable commitment of resources (for example, use of scarce water resources,” and other adverse environmental impact such as hazardous waste discharges. *Id.* Because the retirement of one unit at Northeastern will promptly reduce the plant’s solid waste, water use, and wastewater by half, the proposed SIP Revision scenario is the clear winner for these factors.

In addition, DFGD would use an enormous amount of water in comparison to DSI. As discussed above, PSO has estimated that the increase in water consumption at the Northeastern plant if it were to add dry scrubbers to both units would be at least *65 times greater* than with a retrofit of ACI and DSI at one unit pursuant to the SIP Revision.⁵¹ Another crucial disadvantage of adding a DFGD at each unit is that it would create a new source of highly polluted wastewater at the plant. EPA has recently initiated a rulemaking to address, among other issues, the toxic-laden wastewater associated with SO₂ scrubbers. In light of the many environmental advantages of the proposed SIP Revision compared to the FIP – which would perpetuate the burning of coal at both units, and all its associated pollution, for years to come – this factor of the BART analysis weighs clearly and heavily in favor of the SIP Revision.

Finally, the state must determine the visibility impacts of its BART determination. The deciview improvements are “weighed among the five factors, and [the state is] free to determine the weight and significance to be assigned to each factor.” 70 Fed. Reg. at 39,170. Sierra Club has not reviewed the modeling assumptions and protocol in detail but supports the approach of following the modeling that EPA conducted in support of the FIP. Revised BART Determination at 8.

DEQ notes that visibility improvements would slightly greater under the FIP in 2016, but that these improvements would not be “perceptible.” Revised BART Determination at 11. Although we agree with DEQ’s overall conclusion that the proposed SIP Revision is preferable, and that the differences in visibility improvements are quite small, we disagree that DEQ may disregard a .1 deciview improvement. “Failing to consider less-than-perceptible contributions to visibility impairment would ignore the CAA’s intent to have BART requirements apply to sources that contribute to, as well as cause, such impairment.” 70 Fed. Reg. at 39,129. While Sierra Club does not necessarily agree with each and every rationale DEQ has relied upon in its analysis, Sierra Club supports the proposed SIP Revision because it ultimately will better achieve natural visibility by 2064

⁵¹ Oklahoma Corporation Commission, Cause No. 201200054, PSO Response to Sierra Club Data Request 5-9 (Dec. 20, 2012) (attached hereto as Exhibit 1) (Controls pursuant to EPA settlement will consume approximately 11,250 gallons of water per day, compared with the DFGD option, which would consume approximately 737,000 - 805,000 gallons of water per day for two units).

(as discussed in Section I above), it complies with the BART guidelines, and it will provide a host of environmental and public health benefits that could not be achieved by a retrofit alone.

The state then has the discretion to choose the "best" option, so long as it has considered the above factors consistent with the BART guidelines, and "provide[d] a justification." 70 Fed. Reg. at 39,170-71. For all of the reasons above, Sierra Club believes DEQ correctly and justifiably chose the alternative that provides for the gradual phase-out of the Northeastern coal units. We enthusiastically support the SIP Revision and urge DEQ to promptly move forward with finalizing and implementing the rule.

Sincerely,

A handwritten signature in dark ink, appearing to read 'E. Saxonhouse', with a stylized flourish at the end.

Elena Saxonhouse
Staff Attorney
Sierra Club
85 Second Street, 2nd Floor
San Francisco, CA 94105
(415) 977-5765

Enclosure: Exhibit 1

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

APPLICATION OF PUBLIC SERVICE COMPANY OF)
OKLAHOMA FOR COMMISSION AUTHORIZATION)
OF A PLAN AND COST RECOVERY OF ACTIONS)
OF PSO TO BE IN COMPLIANCE WITH CERTAIN)
ENVIRONMENTAL RULES PROMULGATED BY)
THE UNITED STATES ENVIRONMENTAL) CAUSE PUD 2 01200054
PROTECTION AGENCY; SUCH ACTIVITIES TO)
INCLUDE, BUT NOT BE LIMITED TO, CAPITAL)
EXPENDITURES FOR EQUIPMENT AND)
FACILITIES; CONSTRUCTION OR PURCHASE OF)
AN ELECTRIC GENERATING FACILITY OR ENTER)
INTO A LONG-TERM PURCHASE POWER)
CONTRACT (AND POSSIBLE EARNINGS ON THE)
CONTRACT); CHANGE IN DEPRECIATION RATES)
AND/OR ESTABLISHMENT AND RECOVERY OF A)
REGULATORY ASSET; AND FOR SUCH OTHER)
RELIEF AS THE COMMISSION DEEMS PSO IS)
ENTITLED.)

PUBLIC SERVICE COMPANY OF OKLAHOMA'S RESPONSE TO SIERRA CLUB'S
FIFTH SET OF DATA REQUESTS

Question 9:

(Ref. Response to SC 3-16.)

The study referenced in response to SC 3-16 considers the comparative water consumption and costs thereof for various sulfur dioxide scrubbing technology options, and therefore does not fully respond to Sierra Club's request.

- a. Please compare the water consumption of (i) the controls that would be installed under the EPA Settlement with (ii) the installation of DFGD at both units (i.e., the FIP), and identify and produce any supporting analysis.
- b. Please compare the operational costs for water consumption if the EPA Settlement is implemented with the operational costs for water consumption if DFGD is installed at both units (i.e., the FIP).

Response No. 9:

- a. (i) This arrangement consumes approximately 11,250 gallons of water per day.
(ii) The DFGD options consume approximately 737,000 - 805,000 gallons of water per day for two unit operation.

Please see Sierra Club 5-9, Attachments 1 and 2 for more information.

- b. Using an estimate of \$1 per 1,000 gallons and applying to the estimated consumption in (a) above results in the EPA settlement controls costing approximately \$11.25 per day and the DFGD options ranging from approximately \$737 - \$805 per day.

Prepared By: Kevin J. Munson

Title: Project Director, Western Fleet
Environmental Program



*STATE OF OKLAHOMA
OFFICE OF THE
SECRETARY OF ENERGY*

May 20, 2013

Department of Environmental Quality
Air Quality Division
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677
Attn: Cheryl E. Bradley

VIA Email: Cheryl.Bradley@deq.ok.gov

Re: Revision to Regional Haze State Implementation Plan Including Revisions to Affected Portions of the Interstate Transport SIP for the 1997 8-hour Ozone and 1997 PM_{2.5} NAAQS

Dear Ms. Bradley:

On March 22, 2013, the EPA published a proposal in the Federal Register to partially disapprove revisions to Oklahoma's State Implementation Plan to address Regional Haze. Notice of the EPA's decision came immediately following the EPA's proposal to regulate mercury and air toxins and amidst a vast array of pending and forthcoming Clean Air Act rulemakings. The EPA finalized its Federal Implementation Plan for Regional Haze on January 27, 2012 and its Mercury and Air Toxic Standards (MATS) on February 16, 2012.

Understanding that mitigation options for these rules are inextricably intertwined, the Governor encouraged a holistic and reasonable state-based compliance strategy. In her comments filed April 13, 2011 with the EPA, she directed Secretary of Environment, Gary Sherrer, Secretary of Energy, Michael Ming, and Department of Environmental Quality (DEQ) Executive Director, Steve Thompson, to be available for discussions with the EPA to avert a federal piecemeal approach in favor of a more consolidated, sensible state-driven approach. It is in this regard that the Public Service Company of Oklahoma (PSO) worked with state officials to craft an Oklahoma solution.

With months of extensive technical and legal review by the EPA, the U.S. Department of Justice, PSO, and the State of Oklahoma, the parties ultimately negotiated the settlement agreement that forms the basis for this First Amended Regional Haze Agreement. During the course of this review, the parties worked diligently to ensure that the agreed upon compliance strategy would provide greater regulatory certainty by ensuring compliance with both Regional Haze and MATS, and that this could be accomplished by mitigating costs to consumers. Notably this course of compliance offers greater flexibility regarding thresholds for emissions reductions, it significantly eliminates the risk that substantial capital costs will be passed along to ratepayers if investments are made in compliance technologies that are later deemed insufficient for addressing future environmental regulations, and it protects Oklahoma's environment and the health of Oklahoma citizens. And this is all made possible with greater reliance on Oklahoma's native resources, which are creating local jobs and supporting local economies.

Electric utilities subject to Regional Haze, MATS, and the panoply of pending and forthcoming environmental regulatory measures are compelled to act if they are to meet established compliance deadlines. The settlement agreement offers the "lowest, *risk-adjusted* reasonable cost option for compliance"¹ and it offers promise for future compliance as well with far lower capital risk. Inaction, which would place ratepayers, system reliability, and Oklahoma's environment at risk, simply cannot be an option.

For these reasons, I submit these comments in support of the DEQs First Amended Regional Haze Agreement. Thank you for your consideration.

Sincerely,

James P. Albert
Deputy Secretary of Energy
Office of the Secretary of Energy
State of Oklahoma

¹ OCC Cause No. PUD 201200054. Responsive Testimony of Craig R. Roach, Ph.D. on behalf of the Oklahoma Corporation Commission Staff and the Office of the Attorney General of Oklahoma (January 8, 2013).



STATE OF OKLAHOMA
OFFICE OF THE
SECRETARY OF ENVIRONMENT
www.environment.ok.gov

May 20, 2013

Oklahoma Department of Environmental Quality
Air Quality Division
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677
Attn: Cheryl E. Bradley

Re: Revision to Regional Haze State Implementation Plan Including Revisions to Affected Portions of the Interstate Transport SIP for the 1997 8-hour Ozone and 1997 PM_{2.5} NAAQS

Dear Ms. Bradley:

In March of 2011, the Environmental Protection Agency (EPA) announced its intention to partially approve and partially disapprove Oklahoma's State Implementation Plan (SIP) to come into compliance for Regional Haze, and to promulgate a Federal Implementation Plan (FIP). Within days I was asked by Governor Mary Fallin to work with the affected utilities to try to develop an Oklahoma-based solution that achieved regulatory compliance, while also addressing concerns of the utilities, recognizing the unique nature of their generation structure and their customers' needs.

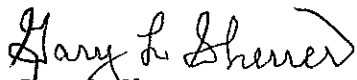
AEP/PSO contacted my office and expressed an interest in working to develop an alternative to the FIP. AEP/PSO wished to work on a plan to achieve compliance with the Regional Haze Rule and a number of other air rules that were at various stages of development. For over a year my staff and I worked with representatives of AEP/PSO and the Oklahoma Department of Environmental Quality to develop an Oklahoma plan. This plan was memorialized as the final settlement agreement that was announced by Governor Fallin in April 2012 and formally signed last fall, which called for development of the new SIP for AEP/PSO that is being considered today.

I am pleased to say that the settlement agreement that was reached allowed AEP/PSO the ability to chart their own course and identify emission control technologies that work best for their plant, rather than installing dry scrubbers as called for in the FIP, while also providing regulatory certainty in planning for compliance with future air rules. After extensive modeling of the Oklahoma plan we have been able to determine that these technologies provide for comparable results and meet all requirements set out in the Regional Haze rule.

This Oklahoma-based plan and the resulting SIP were carefully crafted and vetted to be in both technical and legal compliance with the Clean Air Act and to serve as the replacement for the FIP. This SIP allows for compliance, while also putting AEP/PSO on a path that works best for them and their customers. In addition to meeting Regional Haze requirements, the settlement agreement also is designed to bring AEP/PSO into compliance with the Mercury and Air Toxics Rules and various other air rules.

Once again, thank you for the opportunity to provide comments, and in closing I want to emphasize that I believe that the proposed SIP is in full compliance with both the Clean Air Act and the signed settlement agreement and look forward to it being delivered to EPA for review.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gary L. Sherrer". The signature is fluid and cursive, with a large, sweeping initial "G".

Gary L. Sherrer
Secretary of Environment
State of Oklahoma



FRED S. MORGAN
PRESIDENT AND CEO

May 20, 2013

Ms. Cheryl Bradley, Air Quality Division
Department of Environmental Quality
VIA Email: Cheryl.Bradley@deq.ok.gov

Dear Ms. Bradley:

Please accept these comments on behalf of the State Chamber of Oklahoma in support of Public Service Company of Oklahoma's environmental compliance plan in meeting new Environmental Protection Agency (EPA) regulations. The State Chamber of Oklahoma represents more than 1,000 businesses and like-minded organizations and is concerned with continual federal overreach and burdensome regulations that cost employers and Oklahoma residents additional dollars out-of-pocket, limiting funds available for investment in the growth of our state.

The State Chamber of Oklahoma supports the state implementation plan (SIP) over the less desirable option of an EPA-designed compliance plan. Without the SIP, the Public Service Company of Oklahoma (PSO) will be forced to comply with a federal implementation plan (FIP), which would inevitably come with a greater cost to Oklahoma rate payers – businesses and residential customers.

The proposed SIP allows for transition from a coal-fired to natural gas plant that will reduce emissions from the PSO Northeastern Station in Oologah by 75 percent. The SIP also reduces the cost of the EPA's FIP by \$651 million.

The SIP is necessary to reduce the risk of PSO being exposed to forced compliance with EPA regulations, which would not only increase costs to customers but could also reduce availability in generating capacity.

The State Chamber of Oklahoma asks for expedient approval of the SIP to protect the state from potential negative economic impacts and help in reduction of emissions.

Sincerely,

A handwritten signature in black ink that reads "Fred S. Morgan" followed by a horizontal line.

Fred S. Morgan

FSM:ak

Comments

Public Service Company (PSO) State Implementation Plan (SIP) Hearing

Oklahoma DEQ Headquarters

May 20, 2013

I Support the SIP.

In Oklahoma we are fortunate to have an excellent wind corridor which allows us to become a leader in wind energy production. And we have natural gas which can quickly ramp up power to back up wind production. It makes no sense for Oklahoma to spend 63 million dollars a year to import coal when wind is safe, non-polluting, and the wind itself is free. When we send our money to Wyoming to buy coal, we import more than coal. We import asthma, bronchitis, heart attacks and death.

I would have carried in in 200 pounds of sugar today to demonstrate the amount of mercury being released into Oklahoma's environment every year from the Northeastern unit ALONE. But 200 pounds is too great a burden for me to carry. It is also too great a burden for Oklahoma's environment to carry. Just one gram of mercury is enough to contaminate a 20-acre lake. The mercury threat from burning coal is not hypothetical. The fish are already poisoned in many of Oklahoma's lakes.

The Clean Air Act was signed into law in 1963 to protect us, THE PEOPLE, not to protect PSO and other utilities. Some people complain that when PSO is required to comply with the Clean Air Act, the cost of doing business responsibly will increase customer costs. In its plan to resolve the immediate haze problem by shutting down the Northeast unit PSO estimates customers rates will increase 9.7%. That 9.7% would mean less than \$12 increase per month for a family like mine.

Burning coal is largely responsible for global warming. AND global warming is responsible for the increases in extreme weather we have seen across Oklahoma and the country. My insurance paid \$38,000 to replace the roof on my home, room on the shop, a garage door and guttering in 2010. We were lucky that (one) we were not hurt and (two) that all the damage occurred in one claim. Our friend's damage occurred in 3 separate storms close together, which resulted in their insurance being cancelled even though they had been with the company for many years without claims.

I called my long-time insurance agent last week. He said that previously a "thunderstorm" meant thunder, wind, rain and "maybe pea-size hail". Now he said, almost every thunderstorm brings large hail and tornadoes. Yesterday we watched television for hours as multiple huge E4 tornadoes, at least one a mile wide, crossed Oklahoma.

I say it's time we stop using coal. It's better to spend a relatively few dollars more for wind, natural gas, and solar rather than repeatedly paying thousands of dollars to repair damage caused by a world using too much coal. And while the fear and worry for loved ones is fresh in your mind from yesterday's storms, remember Hurricane Sandy last fall. Sandy cost this nation billions of dollars and lives lost. The increased rates people gripe about today are chump change compared to the consequences we're seeing for years of harm to the environment. It's time we factor in the financial, medical, and emotional consequences of global warming.

PSO needs to follow-through with the SIP to retire the Northeastern unit by 2016 as agreed and ramp up its plans to transition away from coal. It's past time that all utility companies embrace clean energy.

Susan Schmidt
3516 NW 52 St
Oklahoma City, OK 73112

May 20, 2013

Public Hearing

Regional Haze & Transport State Implementation Plan Revision

My name is Jeremy Jewell. I am a Principal with Trinity Consultants, a worldwide environmental consulting firm, and I manage Trinity's operations in Oklahoma.

I was responsible for completing, or overseeing the completion of, the technical analyses for PSO's BART reevaluation. It was these analyses that, after review and approval by the ODEQ, led to the proposed SIP revision that presents a BART determination involving the shutdown of one unit, the installation of Dry Sorbent Injection (or "DSI") on the second unit, and the incremental decrease in capacity utilization leading to the ultimate shutdown of the second unit.

I would like to briefly address our execution of and results of the two analyses that led to the proposed BART determination: (1) estimating the costs of the emissions control and (2) atmospheric modeling of both pre-control and post-control emission scenarios to determine visibility impacts in the nearby Class I areas, which are the Wichita Mountains National Wildlife Refuge in south-west Oklahoma, the Caney Creek Wilderness Area in south-~~east~~^{west} Arkansas, the Upper Buffalo Wilderness Area in north-central Arkansas, and the Hercules Glades Wilderness Area in south-central Missouri.

First, in regards to the modeling analyses, I want to point out four facts.

1. The modeling methods we used to evaluate the revised BART determination were largely the same as those relied upon in the original BART determination. For example, the same CALPUFF processor was used. CALPUFF is the dispersion model used in the multi-step process of conducting visibility modeling. Also, the same meteorological dataset was used. To the extent possible, everything related to the modeling analyses was kept consistent with the previously reviewed and approved analyses.
2. The primary change from the original modeling methods to the updated modeling methods involved the use of the CALPOST processor. CALPOST is the processor that converts the output from CALPUFF into visibility values. Since the original BART determination, EPA developed and now requires the use of a newer version of CALPOST. This newer, EPA-required version was used. Additionally, we used the latest EPA and Federal Land Manager guidance in regards to both the CALPOST algorithm (or "method") and the background concentrations for parameters such as humidity that are fed into CALPOST.

3. The details of all the modeling methods, inputs, and outputs, all of which were based on the latest EPA regulation or guidance, were provided to ODEQ in a protocol for review on or about September 25, 2012. *including baseline and post-control emission rates,*
4. EPA's stated threshold for attributing visibility impairment to any single source of emissions is 0.5 delta deciviews on a daily average 98th percentile basis. The results of the updated modeling show that predicted post-control visibility impacts are less than this threshold for all Class I areas.

In regards to the cost of controls estimates, I will mention three facts.

1. The original BART determination and SIP were based on costs developed by PSO's project engineers. In the Technical Support Document published with EPA's disapproval of the original SIP, EPA presented an alternative cost analysis based largely on its Control Cost Manual, a guidance document most recently published in January 2002.
2. In the BART reevaluation, for all cost effectiveness calculations, we strictly used EPA's Control Cost Manual in the same way that it was used by EPA in the Technical Support Document. We also presented PSO's engineering cost estimates for comparative purposes only, i.e., these were not used directly in the BART determination.
3. The results of the control cost evaluations *-regardless of which method is employed-* show that the scenario presented in the proposed SIP revision is the most cost effective scenario that also achieves the necessary visibility improvement goal mentioned previously.

Thank you for your consideration of these comments.

From: Whitney Pearson [mailto:whitney.pearson@sierraclub.org]
Sent: Monday, May 20, 2013 11:49 AM
To: Bradley, Cheryl
Subject: Comments re: proposed revision to Oklahoma's Regional Haze SIP
Attachments: SierraClubOnlineComments.zip

Ms. Bradley,

Please accept the attached compilation of comments from Sierra Club members and supporters collected online.

Whitney Pearson

--

Whitney Pearson
Associate Organizing Rep
Sierra Club, Beyond Coal
Oklahoma City, OK
(o) 405.286.2277 ext. 223
(c) 405.826.0241

www.beyondcoalok.org

Zach Ragbourn
1410 North Scott St.
Tulsa, OK 74008
(202) 495-3032

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Zach Ragbourn

Whitney Pearson
523 NW 35th St
Oklahoma City, OK 73118-7307
(405) 826-0241

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Sincerely,
Whitney Pearson

Lisa Lewis
2004 W 11th Pl
Stillwater, OK 74074-5118

May 7, 2013

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lisa Lewis

rick poland
425 Chautauqua Ave
Norman, OK 73069-5505
(405) 360-5001

May 7, 2013

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Sincerely,
Lisa Lewis

Jon Sanford
3134 S Boston Pl
Tulsa, OK 74105-1658
(580) 554-4807

May 7, 2013

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Sincerely,
Lisa Lewis

Ingrid Young
848 Fox Ridge Dr
Edmond, OK 73034-7346
(405) 359-9438

May 7, 2013

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Sincerely,
Ingrid Young

Audra Alldredge
PO Box 487
Binger, OK 73009-0487
(405) 247-6020

May 7, 2013

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OK

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Audra Alldredge

Sara Haddock
PO Box 5902
Norman, OK 73070-5902
(405) 321-2572

May 7, 2013

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OK

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Dear Cheryl Bradley,

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Sincerely,
Sara Haddock

Autumn Hartman
1700 NW 179th Ter
Edmond, OK 73012-4152

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Autumn Hartman

Lana Henson
2009 N Gatewood Ave
Oklahoma City, OK 73106-3814
(405) 528-8358

May 7, 2013

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Sincerely,
Lana Henson

Debe Judah
125 S Kalanchoe Ave
Broken Arrow, OK 74012-3126

May 7, 2013

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Sincerely,
Debe Judah

William Hampton
PO Box 621
911 South Oak
Erick, OK 73645-0621
(580) 729-1194

May 7, 2013

Cheryl Bradley
OK

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Sincerely,
William Hampton

Roger Harkness
5830 NW 32nd St
Oklahoma City, OK 73122-1020

May 7, 2013

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Sincerely,
Roger Harkness

Howard Baer
1110 Mockingbird Ln
Norman, OK 73071-4838
(405) 701-1709

May 7, 2013

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Howard Baer

Matthew Sawyer
1415 E 42nd St
Tulsa, OK 74105-4051

May 7, 2013

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Matthew Sawyer

Glenna Mae Hendricks
1515 Young St
Alva, OK 73717-3457
(580) 327-5376

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Glenna Mae Hendricks

Patricia Murano
1540 N Bradley Ave
Oklahoma City, OK 73127-3149

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Patricia Murano

Hester Brown
123 NE 2nd St
G27
Oklahoma City, OK 73104-2247
(405) 601-5598

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Hester Brown

Karen Mott
3809 W Indianola St
Broken Arrow, OK 74012-4581

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Karen Mott

Gayle Harris
1927 NW 17th St
Oklahoma City, OK 73106-1803
(999) 528-2674

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Gayle Harris

Jeff Brown
1701 Westminster Pl
Oklahoma City, OK 73120-1001
(405) 840-1120

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jeff Brown

Michael Koster
PO Box 52098
Tulsa, OK 74152-0098
(505) 670-0755

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael Koster

Darla Bennett
5202 Kershaw Cir
Muskogee, OK 74401-4640

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Darla Bennett

Lin Bacon
1500 S Frisco Ave
Tulsa, OK 74119-3800

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lin Bacon

Donald Peacock
400 84th Ave SE
Norman, OK 73026-3748

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Donald Peacock

Donald Holden
18208 Scarlet Oak Ln
Edmond, OK 73012-4082
(405) 330-9022

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Donald Holden

Michael White
1232 W Churchill Way
Mustang, OK 73064-2151
(405) 376-3466

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael White

Debra Santelli
1415 S Chester St
Stillwater, OK 74074-5017

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Debra Santelli

Mary Morrow
806 W Blackwell Ave
Apt 402
Blackwell, OK 74631-2628

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mary Morrow

Salli Josh
37149 County Street 2603
Anadarko, OK 73005-2350

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Salli Josh

Laura Bottoms
1415 N Elm St
Owasso, OK 74055-4927
(918) 274-9107

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Laura Bottoms

Kim Buckner
PO Box 2755
Ada, OK 74821-2755

May 7, 2013

Cheryl Bradley
OK

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Sincerely,
Kim Buckner

Dustin Tobey
2838 SW 59th St
Oklahoma City, OK 73119-6464

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Sincerely,
Dustin Tobey

Matt Harney
621 NW 19th St
Oklahoma City, OK 73103-1828

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Sincerely,
Matt Harney

Emily Booher
2709 NW 26th St
Oklahoma City, OK 73107-2233

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Emily Booher

Chalmer Labig
129 E 26th St
Tulsa, OK 74114-2415
(918) 261-3917

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Sincerely,
Chalmer Labig

Thomas Blaney
3741 Windscape Ave
Oklahoma City, OK 73179-3840

May 7, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Thomas Blaney

Beau Brock
5018 E 68th St
Tulsa, OK 74136-3367
(918) 270-1999

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Beau Brock

Matthew Cremer
1307 S Evanston Ave
Tulsa, OK 74104-4819

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Sincerely,
Matthew Cremer

David Braden
1143 NW 38th St
Oklahoma City, OK 73118-5423

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
David Braden

Bridget Barlow
1111 E Normal St
Tahlequah, OK 74464-3321
(918) 453-0698

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Sincerely,
Bridget Barlow

Crockett Cox
201 N Mississippi Ave
Atoka, OK 74525-1843
(580) 889-8809

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Sincerely,
Crockett Cox

Marla Saeger
PO Box 2083
Tahlequah, OK 74465-2083

May 7, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Marla Saeger

V Kay Jordan
965 Barkley Cir
Norman, OK 73071-4404
/

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Sincerely,
V Kay Jordan

Betty White
10517 Fawn Canyon Dr
Oklahoma City, OK 73162-6622
(405) 722-4495

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Betty White

Lee Baum
1516 Carlisle Ct
Oklahoma City, OK 73120-1318
(405) 241-6761

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Sincerely,
Lee Baum

Art Vinson
699 Parkway Cir
Durant, OK 74701

May 7, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Sincerely,
Art Vinson

Ricahrd Forehand
243 S Maple St
Nowata, OK 74048-3403

May 7, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ricahrd Forehand

Christopher Burton
4323 E 5th Pl
Tulsa, OK 74112-2718
(918) 836-0608

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Christopher Burton

Jerry Henry
9215 E Cherry Ln
Claremore, OK 74019-0261
(918) 283-7971

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jerry Henry

Fred Sapulpa
9168 E Newton Pl
Tulsa, OK 74115-5946
(918) 834-7472

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Fred Sapulpa

Rebecca Oberlin
412 E 12th St
Okmulgee, OK 74447-6082
(918) 756-8486

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Rebecca Oberlin

Jon Roberts
2525 NW 24th St
Oklahoma City, OK 73107-2203

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jon Roberts

Terry Butler
2000 S Rankin St
Edmond, OK 73013-5136
(405) 204-9184

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Terry Butler

Robert Lobsinger
PO Box 326
Newkirk, OK 74647-0326

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Robert Lobsinger

Vicki Rose
11813 E Hefner Rd
Jones, OK 73049-8413
(405) 388-0372

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Vicki Rose

Larry Bailey
2729 NW 36th St
Oklahoma City, OK 73112-7475
(405) 833-1401

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Larry Bailey

Chadwick Cox
2241 Ravenwood Ln
Norman, OK 73071-7427
(405) 329-8860

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

Here is our chance to clean up our NE skies. I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Chadwick Cox

Colbi Lawson
1010 E 15th St
Ada, OK 74820-6919

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Colbi Lawson

Eric Huerter
6605 E 55th St
Tulsa, OK 74145-8503

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Eric Huerter

Amy Venable
1312 Glenwood St
Norman, OK 73069-6816
(405) 321-6346

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Amy Venable

Michael Battles
16620 Valley Crst
Edmond, OK 73012-6723
(405) 285-8110

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael Battles

Joel Olson
1305 S Broadway St
Moore, OK 73160-5328
(405) 793-2585

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Joel Olson

Jennifer Phenix
PO Box 1547
Ponca City, OK 74602-1547

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jennifer Phenix

Chuck Lasbig
706 S Norfolk Ave
Tulsa, OK 74120-4418

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Chuck Lasbig

Ruby Ketron
PO Box 425
Buffalo, OK 73834-0425

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ruby Ketron

Rob Robertson
2023 W Easton St
Tulsa, OK 74127-6527
(918) 852-7973

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Rob Robertson

Chuck Melick
2111 N Delaware Blvd
Tulsa, OK 74110-2206

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Chuck Melick

Sam Eller
215 S Margene Dr
Oklahoma City, OK 73130-4218

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sam Eller

Nick Frayser
712 W South Park Blvd
Broken Arrow, OK 74011-2038

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nick Frayser

David Goza
1207 Barkley Ave
Norman, OK 73071-4811
(405) 307-0809

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
David Goza

Kevin Valliquette
16013 Big Cypress Dr
Edmond, OK 73013-1709

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kevin Valliquette

Raelee Harrell
2384 Heatherfield Ln
Norman, OK 73071-1440

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Raelee Harrell

Brad Gordon
1504 Potomac Dr
Ponca City, OK 74601-2325

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Brad Gordon

Martha Holland
3515 NW 17th St
Oklahoma City, OK 73107-2805

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Martha Holland

Terri Gibson
1203 Beverly Hills St
Norman, OK 73072-5908
(405) 579-1368

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

To protect the health of kids like mine who suffer from asthma, I ask you to please finalize the proposed State Implementation Plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Terri Gibson

Robert Trickey
9790 W 64th St S
Sapulpa, OK 74066-7295
(918) 764-9378

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Robert Trickey

Rosemary Crawford
102 E Thatcher St
Edmond, OK 73034-3662
(405) 844-3226

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Rosemary Crawford

Vanessa Cordes
14326 Old Monroe Hwy.
Poteau, OK 74947

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Vanessa Cordes

Liam Whitlock
2737 NW 68th St
Oklahoma City, OK 73116-4711

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Liam Whitlock

David Timmons
PO Box 500
Stroud, OK 74079-0500

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
David Timmons

Sally Hill
5729 E 30th St
Tulsa, OK 74114-6412
(918) 720-5734

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sally Hill

Robert Burke
6425 S 27th West Ave
Tulsa, OK 74132-1384

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

We have the biggest producers of natural gas here in the state and we buying our power from someone else? How are we to support Pickens plan if we can't be a model ourselves? Other states will reject Nat gas power generation. Duke energy has switched and they claim benefits of reduced emissions, lower carbon footprint, lessened environmental impact, and huge profits. This is one change you can win win

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Robert Burke

John Havens
4617 Rhode Island Ave
Edmond, OK 73013-4751
(405) 341-7796

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
John Havens

Paul Moore
1611 S Detroit Ave
Tulsa, OK 74120-6213
(918) 584-6447

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Paul Moore

Jo Ann Howse
5255 S 69th East Ave
Tulsa, OK 74145-7621
(918) 749-3233

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jo Ann Howse

Doug Stevenson
2137 W Admiral Rd
Stillwater, OK 74074-2504

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Doug Stevenson

Zoe Harty
2733 Warwick Dr
Oklahoma City, OK 73116-4210
(405) 286-0216

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Zoe Harty

Jeffrey Fernandez
222 N Oklahoma St
Tryon, OK 74875-7796

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jeffrey Fernandez

Wilma Walters
7620 E 21st St
Tulsa, OK 74129-1215

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Wilma Walters

James Wear
310 W 11th St
Shawnee, OK 74801-6710

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
James Wear

Suzy Cline
708 W South Park Blvd
Broken Arrow, OK 74011-2037

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Suzy Cline

Marie Azzinaro
1200 SW 100th Ter
Oklahoma City, OK 73139-2995

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Marie Azzinaro

Ned Nielsen
4810 Grenada Ave
Sand Springs, OK 74063-2019

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ned Nielsen

Mercedes Lackey
16525 E 470 Rd
Claremore, OK 74017-4445
(918) 342-4826

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

Under the proposed plan, in three years, the plant's yearly emissions of sulfur dioxide will be cut by 75% and other pollutants like mercury will be reduced drastically. The first coal-burning unit at the Northeastern plant will be phased out by April 16, 2016. Between 2021 and 2026, PSO will significantly reduce the amount of coal burned at the unit that is still operating until it is decommissioned no later than December 31, 2026.

This plan will cut dangerous sulfur dioxide and other air pollutants they have been putting in our air for decades. Implementing this plan will ensure cleaner air in Oklahoma and give a boost to clean energy!

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mercedes Lackey

Marvin Cooke
2924 E 103rd St
Tulsa, OK 74137-5631

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Marvin Cooke

Leeann Samson
336 SE 4th St
Pryor, OK 74361-6216

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Leeann Samson

Patricia Kunkel
11308 Kingsgate Ln
Oklahoma City, OK 73170-4450
(405) 821-0053

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Patricia Kunkel

Terence Mcdowell
2816 W Lexington Way
Edmond, OK 73012-4224
(405) 348-4936

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Terence Mcdowell

Patrick Spurlock
W 31st St S
Mannford, OK 74044
(449) 188-6543

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Patrick Spurlock

Michael Connors
4127 E 43rd St
Tulsa, OK 74135-2849

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael Connors

Ina Albertson
3708 S Douglas Ave Apt 21
Oklahoma City, OK 73109-3246

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ina Albertson

Neil Winslow
11300 N Penn Ave Apt 181
Oklahoma City, OK 73120-7775
(405) 936-9493

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Neil Winslow

Ray Brookshire
1317 S 123rd East Ave
Tulsa, OK 74128-5217

May 7, 2013

Cheryl Bradley
OK

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ray Brookshire

Kim Roberts
322 S Brewer St
Vinita, OK 74301-4156
(918) 964-0262

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kim Roberts

Lori Spears
1051 N Quincy Ave
Tulsa, OK 74106-5432

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lori Spears

Gail Garloch
15305 Rocky Mountain Dr
Edmond, OK 73013-8885

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Gail Garloch

Sharon Norris
4137 E 37th Pl
Tulsa, OK 74135-2325
(918) 749-8093

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sharon Norris

Nicole Chau
3204 Ridgecrest Ct
Norman, OK 73072-7516

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nicole Chau

Franklin Walters
1024 W Warner Ave
PO Box 1561
Guthrie, OK 73044-2730
(305) 898-8480

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Franklin Walters

Caleb White
20868 NE 10th St
Apt C
Harrah, OK 73045-9254
(210) 288-1699

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Caleb White

Nikki Smith
10525 N Sheridan Rd
Sperry, OK 74073

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nikki Smith

Judy Adler
1530 NW 32nd St
Oklahoma City, OK 73118-3404
(541) 441-3064

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Sincerely,
Judy Adler

Nikki Smith
10526 N Sheridan Rd
Sperry, OK 74073-4519

May 7, 2013

Cheryl Bradley
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Dear Cheryl Bradley,

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Sincerely,
Nikki Smith

John Hartman
5112 E 23rd St
Tulsa, OK 74114-3706
(918) 744-6452

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
John Hartman

Donna Davis
1929 Shelby Ct
Norman, OK 73071-2213
(405) 329-5495

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Donna Davis

Theresa Tiner
4722 W 85th St
Tulsa, OK 74132-3407
(918) 446-7835

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Theresa Tiner

Darlene Litton
PO Box 4024
Edmond, OK 73083-4024

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Darlene Litton

Amber Newcombe
124 Acker Dr
Ada, OK 74820-7201
(580) 235-8163

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Amber Newcombe

Judy Willis
1501 S Main St Apt B-203
Stillwater, OK 74074-7967

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Judy Willis

Adrienne Rogers
2510 S Quebec Ave
Tulsa, OK 74114-4828
(918) 742-9878

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Adrienne Rogers

Nancy Smart
320 Bumgarner Ave
Norman, OK 73026-3721
(405) 329-8904

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nancy Smart

Ray & Alicia Gibson
2611 Trenton Rd
Norman, OK 73069-5049
(405) 447-6956

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ray & Alicia Gibson

Jean McMahon
23181 Idlewild Ln
Fort Gibson, OK 74434-6029
(918) 478-4441

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan. Actually the plan is extremely weak if we really want to protect health..Why is Oklahoma not developing large scale solar???Suppose the extinction of the human species is close by..what would really be necessary?? Thanks

Sincerely,
Jean McMahon

Jean McMahon
23181 Idlewild Ln
Fort Gibson, OK 74434-6029
(918) 478-4441

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Sincerely,
Jean McMahon

Diane Woodward Frost
7441 S Winston Ave
Tulsa, OK 74136-6119
(918) 494-9946

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Oklahoma air is so toxic and so difficult--that this move really cannot come soon enough!

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Diane Woodward Frost

Paul G. Scott
4641 Woodland Blvd Apt 128
Oklahoma City, OK 73105-6828

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Paul G. Scott

Gayle Ferioli
12501 W Glen Ct
Choctaw, OK 73020-6662
(405) 259-9060

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Gayle Ferioli

Cynthia Stevenson
2137 W Admiral Rd
Stillwater, OK 74074-2504
(405) 707-0320

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Cynthia Stevenson

Sally Blevins
2206 NW 17th St
Oklahoma City, OK 73107-4017
(405) 525-5907

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sally Blevins

Len Lorette
611 S Lusk Ave
Elk City, OK 73644-6301
.

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Len Lorette

Barbara Vanhanken
2212 E 38th St
Tulsa, OK 74105-3406
(918) 749-9093

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Barbara Vanhanken

Susan Singh
1762 E 60th St
Tulsa, OK 74105-7013
(918) 749-7004

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

It is time for all Oklahomans to give priority to improving the health of our state residents which falls below that of most other states. Why should we accept this situation?

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Susan Singh

Nancy Zorn
7121 N Comanche Ave
Warr Acres, OK 73132-6629
(405) 488-8980

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule. We must move BEYOND COAL. This is a good step in that direction.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nancy Zorn

Brandon Burnette
3025 Kande Ln
Durant, OK 74701-1667

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Brandon Burnette

Gerry Pinion
4 Windsor Cir
Stillwater, OK 74074-6708
(405) 743-2822

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Gerry Pinion

Barbara Grimm
3310 W Pittsburg Pl
Broken Arrow, OK 74012-9025
(918) 252-7033

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Barbara Grimm

Margaret Moran
215 NW 10th St # 104
Oklahoma City, OK 73103-3901
(317) 919-6251

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Margaret Moran

Joe Powers
1720 1/2 E 13th St
Tulsa, OK 74104-4418

May 7, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Joe Powers

Kenneth Slade
3508 S Marion Ave
Tulsa, OK 74135-4507
(918) 747-6981

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kenneth Slade

duane wittman
14765 E 560 Rd
Inola, OK 74036-5093
(918) 543-6353

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
duane wittman

Wenda Carr
1030 Biloxi Dr
Norman, OK 73071-2305
(405) 364-3786

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Wenda Carr

Dave Ryhal
801 S 75th St
Broken Arrow, OK 74014-7316

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dave Ryhal

Michael Dragoo
1547 S Newport Ave
Tulsa, OK 74120-6226

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael Dragoo

Tamara Smith
10401 N Midwest Blvd
Jones, OK 73049-5815

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Tamara Smith

Tamara Smith
10401 N Midwest Blvd
Jones, OK 73049-5815

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Tamara Smith

Sharleen Mehemed
PO Box 849
222 S 209th West Ave
Sand Springs, OK 74063-0849
(918) 550-1212

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sharleen Mehemed

Darry Carlstone
614 W Downing St
Tahlequah, OK 74464-2716
(918) 207-0830

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Darry Carlstone

Andrea Smith
151 W Ithica Pl
Broken Arrow, OK 74012-7940

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Andrea Smith

Fran Stallings
1406 Macklyn Ln
Bartlesville, OK 74006-5419
(918) 333-7390

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Fran Stallings

Betty Leggiero
10600 Kunkel Ave
Norman, OK 73026-5920
(405) 558-1874

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Betty Leggiero

Larry Godwin
1312 SW 133rd St
Oklahoma City, OK 73170-5030

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan. This is one of the best plans in a long time. Thank you!!!!

Sincerely,
Larry Godwin

Lynn Crussel
1224 Iowa St
Norman, OK 73069-6820
(405) 701-0678

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lynn Crussel

Connie Allen
1608 Leawood Dr
Edmond, OK 73034-6923

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Connie Allen

Roseanne Hartman
5112 E 23rd St
Tulsa, OK 74114-3706
(918) 744-6452

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Roseanne Hartman

Brenda Boren
8025 NW 31st St
Bethany, OK 73008-4337
(405) 787-8159

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Brenda Boren

Nathaniel Batchelder
2912 N Robinson Ave
Oklahoma City, OK 73103-4123
(405) 524-5577

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Sincerely,
Nathaniel Batchelder

Nicholas Hartman
5112 E 23rd St
Tulsa, OK 74114-3706

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nicholas Hartman

Nancy Haskell
2912 N Robinson Ave
Oklahoma City, OK 73103-4123
(213) 270-5400

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nancy Haskell

Deanna Homer
2105 E Marcus Ave
Stillwater, OK 74075-8636
(405) 377-0918

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Deanna Homer

Mary Price
2501 E Leroy Rd
Cleveland, OK 74020-3685
(918) 243-5353

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mary Price

Susan Parent
732 4th St
Alva, OK 73717-2818

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Susan Parent

Charisse Piros
1020 E 66th Pl Apt 233
Tulsa, OK 74136-3720
(918) 313-0457

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Charisse Piros

Gene Denney
18760 Highway 52
Morris, OK 74445-2753

May 8, 2013

Cheryl Bradley
OK

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Sincerely,
Gene Denney

Sarah Hall
1100 NE 19th St
Moore, OK 73160-6308
(405) 406-4544

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sarah Hall

Rebecca Kossan
2707 S Cambridge Dr
Stillwater, OK 74074-2289
(405) 624-3606

May 8, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Rebecca Kossan

Mary Vogh
403381 W 2050 Dr
Bartlesville, OK 74006-0143
(918) 333-5725

May 9, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mary Vogh

Jacqueline De Los Santos
917 Dover Dr
Edmond, OK 73034-6458
(405) 348-2635

May 9, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jacqueline De Los Santos

Elizabeth Nelson
5314 E 36th St
Tulsa, OK 74135-5230
(918) 622-2367

May 9, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Sincerely,
Elizabeth Nelson

Joanna Kouri
N/a
Okc, OK 73107

May 9, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Sincerely,
Joanna Kouri

Sara Wilcox
644 N Lewis Ave
Tahlequah, OK 74464-2303

May 9, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sara Wilcox

Michael Blair
15475 Northlake Dr
Claremore, OK 74017-1771

May 9, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael Blair

Joy Avery
1504 E 37th St
Tulsa, OK 74105-3224
(918) 712-5331

May 9, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Joy Avery

Carol Sullivan
3139 Venice Blvd
Oklahoma City, OK 73112-7465
(512) 477-9151

May 10, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Carol Sullivan

Diana Frost
1710 Stonewood Cir
Norman, OK 73026-0628
(405) 360-0595

May 10, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

Hello. I live in Norman, OK but my family home is in Tulsa, OK and I have driven by this plant many times. Of course, we all breathe the same air. How long must we all stay shackled to coal? The time is now to step into the new century.

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Diana Frost

Betty Mae Caywood
PO Box 265
Canton, OK 73724-0265
(580) 886-2685

May 10, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Betty Mae Caywood

Erin Tingler
246 N University Pl
Stillwater, OK 74075-3946

May 10, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Erin Tingler

Rodney & Terri Jones
3255 E 2120 Rd
Hugo, OK 74743-4510

May 10, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Rodney & Terri Jones

Shawn Owen
1318 S 73rd East Ave
Tulsa, OK 74112-6714
(918) 408-0294

May 10, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Sincerely,
Shawn Owen

Anthony Lyons
121 Crepe Myrtle Ln
Durant, OK 74701-7262

May 10, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Anthony Lyons

Jenny Woodruff
504 NW 32nd St
Oklahoma City, OK 73118-7341
(405) 528-9011

May 11, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jenny Woodruff

Judy Sing
PO Box 33
Macomb, OK 74852-0033

May 11, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Judy Sing

Ramon Chavez
2225 Oak Dr
Moore, OK 73170-7922

May 12, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ramon Chavez

Leslie Bradford
2107 Briarcliff Dr
Oklahoma City, OK 73170-7428

May 12, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Leslie Bradford

Sue Blackmon
10700 S Dobbs Rd
Newalla, OK 74857-5901
(405) 386-3721

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sue Blackmon

Kathy Nix
901 Regal Rd
Yukon, OK 73099-3438
(405) 350-8980

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kathy Nix

Margaret Carroll
2127 E Redbud Rd
Washington, OK 73093-9244

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Margaret Carroll

Margaret Scott
45 Windsor Cir
Stillwater, OK 74074-6708

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Margaret Scott

Jeffrey Boyd
3713 E 40th St
Tulsa, OK 74135-2413
(918) 640-6296

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jeffrey Boyd

Henry Roberson
1141 Pinehurst Dr
Norman, OK 73072-7604

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Henry Roberson

Terry Baxter
2534 E 19th St
Tulsa, OK 74104-5806
(918) 747-0249

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Terry Baxter

A. Daum
1704 NW 183rd Ter
Edmond, OK 73012-4170

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
A. Daum

Nelda Farrow
18200 Bethel Rd
Shawnee, OK 74801-9303
(405) 273-6731

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nelda Farrow

Wallace Collins
4100 N Lincoln Blvd
Oklahoma City, OK 73105-5209

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule. I have GRAND kids with breathing problems, we need to do all we can to help them and others like them!

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Wallace Collins

Leslie Smith
PO Box 52823
Tulsa, OK 74152-0823
(918) 499-1550

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Leslie Smith

Mike Anderson
1213 SW 91st St
Oklahoma City, OK 73139-2603

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mike Anderson

Steve Wold
PO Box 5743
Norman, OK 73070-5743
(505) 470-4613

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Steve Wold

Jariel Barnes
13191 E 29th St
Tulsa, OK 74134-2814

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jariel Barnes

Gregory Dickson
819 NW 30th St
Oklahoma City, OK 73118-7233
(405) 279-9528

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Gregory Dickson

Joyce Gibb
6911 N Independence Ave
Oklahoma City, OK 73116-3324

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Joyce Gibb

Janet Whisler
2029 NW 45th St
Oklahoma City, OK 73118-1903
(405) 840-5322

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Janet Whisler

Hoda Katebi
16500 Thorton Ln
Edmond, OK 73012-6883
(405) 359-1935

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Hoda Katebi

Bethany Townsley
1312 S Quincy Ave
Tulsa, OK 74120-5219

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Bethany Townsley

Jay Ross
2628 E 20th St
Tulsa, OK 74104-5812
(918) 747-7248

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jay Ross

Jason Eversole
512 S 102nd East Ave
Tulsa, OK 74128-2640

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jason Eversole

Cindy Kerr
227 E 149th St S
Glenpool, OK 74033-4418
(918) 960-9900

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Cindy Kerr

Sophia Wilks
1508 NW 22nd St
Oklahoma City, OK 73106-4032

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sophia Wilks

Skylar Mott
5625 S Rockford Ave
Tulsa, OK 74105-7924

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Skylar Mott

Robert Leveridge
345 Wewoka Dr # Rman
Norman, OK 73071-7209
(405) 329-3442

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Robert Leveridge

Gene Hunt
4536 Kiva Ct
Oklahoma City, OK 73135-3177
(405) 619-5763

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan. We need to move ahead as quickly as possible however provision needs to be made to assist those whose jobs will be eliminated.

Gene O. Hunt

Sincerely,
Gene Hunt

George Kesselring
611 S Country Club Rd
Muskogee, OK 74403-6222

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
George Kesselring

Rita DeCastro
523 W Walnut Ave
Enid, OK 73701-3090
(580) 233-4563

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

Dear Ms. Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Rita DeCastro
523 W. Walnut Ave.
Enid, OK 73701-3090
usa

Sincerely,
Rita DeCastro

Lawson Crout
1405 Elm Ave
Norman, OK 73072-6422

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lawson Crout

Deborah Hanson
316 Ridgeview Dr
Claremore, OK 74017-4810

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

Done! We are done with coal as a means of supporting electricity in Oklahoma! I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Deborah Hanson

Sharon Mullins
6497 Valley View Rd
Edmond, OK 73034-8565
(405) 844-2849

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sharon Mullins

Marinel Kelley
2605 NW 112th St
Oklahoma City, OK 73120-6404

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Marinel Kelley

Mercedes Lackey
16525 E 470 Rd
Claremore, OK 74017-4445
(918) 342-4826

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

Large industrial electric customers are opposed to the plan and demand emissions controls be added to the plant instead. That costly plan would lock us in to several more decades of coal. They are ignoring the 1,000 asthma attacks and 94 heart attacks each year linked to the pollution from Northeastern and the families and communities affected by it and the problems associated with the entire lifecycle of coal. But our voices can speak louder than the

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mercedes Lackey

Carlee Singh
8920 N 139th East Ave
Owasso, OK 74055-2588

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

Thank you for promptly finalizing the proposed State Implementation plan for phasing out PSO's Northeastern coal plants.

Sincerely,
Carlee Singh

Ludmila Dmitriev-Odier
2714 N Running Bear St
Stillwater, OK 74075-6148

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ludmila Dmitriev-Odier

Terry Ratliff
4101 W Main St Apt C
Norman, OK 73072-4543

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Terry Ratliff

Donna Sharp
2905 N 15th St
Broken Arrow, OK 74012-9478

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Donna Sharp

Robert Ahrendt
17515 W 1st St S
Sand Springs, OK 74063-5292
(918) 245-6536

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule. This plan will preserve the beautiful Grand Lake area from unneeded and hazardous air and water pollution.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency. Money is not the health problem - pollution is.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers. Good Neighbor Companies will aid in resolving these pollution problems thereby benefiting all Northeast area residents and visitors.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Robert Ahrendt

Angela Lowry
1717 S Pine Pl
Broken Arrow, OK 74012-5218
(918) 231-5326

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Angela Lowry

Kevan Judah
125 S Kalanchoe Ave
Broken Arrow, OK 74012-3126
(918) 254-9730

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kevan Judah

Chris Walker
12511 W 68th St S
Sapulpa, OK 74066-7789

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Chris Walker

Janet Hornsby
3604 NW 70th St
Oklahoma City, OK 73116-2020
(405) 250-6238

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Janet Hornsby

Lydia Garvey
429 S 24th St
Clinton, OK 73601-3713
(580) 323-2327

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lydia Garvey

Luke Pruitt
1827 Drakestone Ave
Nichols Hills, OK 73120-4715

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan. I happily urge you to take advantage of this opportunity to act compassionately. Peace be with you.

Sincerely,
Luke Pruitt

Michael Beilfuss
2402 N Glenwood Dr
Stillwater, OK 74075-2671

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I am writing to express my support of the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael Beilfuss

Charles Shah
1612 NW 44th St
Oklahoma City, OK 73118-5006
(405) 365-4836

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Charles Shah

Claude Simmons
3943 Rockwood Rd
Enid, OK 73703-1478
None

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Claude Simmons

Theresa Duval
2901 Alethea Dr
Moore, OK 73160-6083
(405) 237-3594

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Theresa Duval

Kristina Wyckoff
1129 Trout Ave
Norman, OK 73069-4717
(352) 213-3390

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kristina Wyckoff

Sharon Irvine
6716 S Marion Ave
Tulsa, OK 74136-2809

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sharon Irvine

Carol Preston
2310 Bridlewood Dr
Stillwater, OK 74074-2389

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Carol Preston

Charles Wesner
616 Tulsa St
Norman, OK 73071-4635
(405) 321-2204

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Charles Wesner

Mike Moore
2545 NW 24th St
Oklahoma City, OK 73107-2203

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mike Moore

Paul Johnson
801 N Mingo Rd Trlr 252
Tulsa, OK 74116-5643
(918) 512-1012

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Paul Johnson

Lisa Brown
1116 E 35th Pl
Tulsa, OK 74105-2514
(918) 491-5931

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lisa Brown

Jennifer Robertson
1500 Barkley St
Norman, OK 73071-4604

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jennifer Robertson

Christina Akly
325 NE 3rd St Apt 202
Oklahoma City, OK 73104-4081

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Christina Akly

Jeri Liggett
1135 NW 46th St
Oklahoma City, OK 73118-5227
(405) 943-5113

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jeri Liggett

Jessica Pynn
710 1/2 SW A Ave
Apt A
Lawton, OK 73501-3932
(580) 647-3387

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jessica Pynn

Stacy Christiansen
1343 E 37th Pl
Tulsa, OK 74105-3209
(918) 289-0368

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Stacy Christiansen

John Macgregor
2503 Centennial Ct
Enid, OK 73703-5061

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
John Macgregor

Susan Berndt-Knighton
1616 Ridgemont Cir
Norman, OK 73071-7451

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Susan Berndt-Knighton

Larry Shepard
2800 E Dallas St
Broken Arrow, OK 74014-2315
(918) 258-3420

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Larry Shepard

Chris Applegate
622 N Jones Ave Apt 2
Norman, OK 73069-7763
(417) 294-0698

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Chris Applegate

Angela Moffatt
1221 Lamplighter Ln
Edmond, OK 73034-4971
(405) 341-8890

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Angela Moffatt

Sheri McGee
5210 S 32nd West Pl
Tulsa, OK 74107-9004
(918) 629-5056

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sheri McGee

Paul Coyle
PO Box 451
Sperry, OK 74073-0451

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Paul Coyle

Robert Gentry
7012 N Anderson Rd
Spencer, OK 73084-7919
(405) 245-4879

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Thank you for taking this step to make Oklahoma a good home.

Sincerely,
Robert Gentry

Dianna Stevens
212 W Chestnut St
Stilwell, OK 74960-2630
(918) 696-7607

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dianna Stevens

Cyndy Green
1025 N Windermere Dr
Moore, OK 73160-1423
(405) 735-6827

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Cyndy Green

Michael Henkell
1304 Nancy Dr
Enid, OK 73701-2795

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael Henkell

Paula Lane
33372 Calhoun Rd
Shady Point, OK 74956-2069

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Paula Lane

Catherine Sullivan
431 S Wilson Ln
Atoka, OK 74525-5151

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

Come on DEQ! I'm counting on you to do what is right for our state; right for our country; right for generations to come.

Please promptly finalize the proposed State Implementation Plan.

.

Sincerely,
Catherine Sullivan

Arikka Finn
8751 S Toledo Ave
Tulsa, OK 74137-2724

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Arikka Finn

Susan Clinkscates
1525 N 13th St
Duncan, OK 73533-3401
(580) 252-2050

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Susan Clinkscates

Angela Thompson
4917 S Briarwood Dr
Oklahoma City, OK 73135-1201
(405) 923-7212

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Angela Thompson

Karen Maddox
5809 Montford Way
Choctaw, OK 73020-2010

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Karen Maddox

Diana Cravatt
PO Box 7
Leon, OK 73441-0007

May 15, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Diana Cravatt

Barbara Ellison
33850 R. Summerfield Rd.
Wister, OK 74966

May 15, 2013

Cheryl Bradley
OK

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Sincerely,
Barbara Ellison

Lorri Redmon
7116 NW 119th St
Oklahoma City, OK 73162-1658

May 15, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lorri Redmon

Kathleen Harper
701 Highland Pkwy
Norman, OK 73069-7525
(405) 501-2238

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kathleen Harper

Pat Hoerth
6201 County Road 90
Red Rock, OK 74651-0318
(580) 917-6011

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Pat Hoerth

Kem Maher
4035 E 27th St
Tulsa, OK 74114-5942

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kem Maher

David Thompson
628 S 15th St
Chickasha, OK 73018-2938
(405) 222-0380

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
David Thompson

Fran Alavi
15812 Claremont Blvd
Edmond, OK 73013-1005

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Fran Alavi

Jacquelyn Dill
6720 NW 119th St
Oklahoma City, OK 73162-1777
(405) 226-3709

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jacquelyn Dill

Nancy Sander
1801 Woodhill Rd
Edmond, OK 73025-2907
(405) 285-6950

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Nancy Sander

Kathy Fox
1201 S Rockford Ave
Tulsa, OK 74120-5250

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kathy Fox

Norman Hammon
320 N Flood Ave
Norman, OK 73069-6911
(405) 360-6650

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Norman Hammon

Vanessa Lester
4103 SE 11th St
Del City, OK 73115-2215
(405) 243-3028

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Vanessa Lester

Anduril White
326 N Oklahoma Ave
Mangum, OK 73554-3010

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Anduril White

Karl Rysted
609 N Bouziden Pl
Moore, OK 73160-6841

May 15, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Karl Rysted

Sonya Wallace
1504 W Latimer Ct
Tulsa, OK 74127-5316

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sonya Wallace

Dr JA Stewart
5110 E 86th Pl
Tulsa, OK 74137-2908

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dr JA Stewart

Bill Torres
17321 Avila Ln
Oklahoma City, OK 73170-6640

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Sincerely,
Bill Torres

Diane Helt
3744 E 58th St
Tulsa, OK 74135-4153
(918) 798-4147

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Diane Helt

Susan Caldwell
1210 Woodland Dr
Norman, OK 73072-6313
(405) 364-3795

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Susan Caldwell

Lonney Corder-Agnew
4417 N Indiana Ave
Oklahoma City, OK 73118-2221
(405) 605-4343

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lonney Corder-Agnew

Marie Azzinaro
1200 SW 100th Ter
Oklahoma City, OK 73139-2995
(405) 691-2816

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Marie Azzinaro

James Oglesby
1609 NW 46th St
Oklahoma City, OK 73118-2202

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
James Oglesby

Greg Tomblin
8438 Highway 82
Hulbert, OK 74441-3647

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Greg Tomblin

Suzanne Reinman
5212 W McMurtry Rd
Stillwater, OK 74075-0970
(405) 624-1679

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Suzanne Reinman

Sondra & Samir Shehab
2904 Summit Hill Rd
Norman, OK 73071-4110
(405) 329-1489

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sondra & Samir Shehab

Laura Figueroa
1400 Asp Ave
Norman, OK 73072-7133

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Laura Figueroa

Kelly L.
8903 N 104th East Ave
Owasso, OK 74055-6805

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kelly L.

Darla Shelden
2735 NW 17th St
Oklahoma City, OK 73107-3928

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Darla Shelden

James Marlin
1517 N 22nd St
Broken Arrow, OK 74012-2320

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
James Marlin

Jane Ard
611 NW Waterford Dr
Lawton, OK 73505-5247
(580) 355-4444

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jane Ard

Martha Miller-Hampton
9815 S 4206 Rd Unit B
Chelsea, OK 74016-3464

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Martha Miller-Hampton

Charles & Kathryn Woltz
2909 Tropicana Ave
Norman, OK 73071-1706
(405) 573-7415

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Charles & Kathryn Woltz

Dortha Killian
904 Tarkington Dr
Norman, OK 73026-0868
(405) 321-6832

May 15, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dortha Killian

Dennis Bowles
430 S 54th West Ave
Tulsa, OK 74127-7440

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dennis Bowles

Philip Caracena
7400 Arbor Valley Dr
Edmond, OK 73025-1853

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

My damaged lungs are a victim of polluted air so I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Philip Caracena

Hilary Stambaugh
1531 S Columbia Pl
Tulsa, OK 74104-4726

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Hilary Stambaugh

Jasen Stevens
1229 N F St
Muskogee, OK 74403-2128

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jasen Stevens

Mary Lea Wallace
122 Pine Tree Ln
Norman, OK 73072-5011
(405) 329-2972

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mary Lea Wallace

Weldon Williams
7625 N 140th East Ave
Owasso, OK 74055-7102
(918) 272-1421

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Weldon Williams

Lisa Nelson
702 Summit Dr
Ada, OK 74820-8311

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lisa Nelson

Patricia Mccauley
642 Meadow Land Dr
Moore, OK 73160-0836
(405) 360-5507

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Patricia Mccauley

Sophia Morren
1406 Brookside Dr
Norman, OK 73072-6347

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sophia Morren

Valerie Fuller
769 W 13th St
Tulsa, OK 74127-9162

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Valerie Fuller

Josh Langille-Hoppe
PO Box 722
Tecumseh, OK 74873-0722

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Josh Langille-Hoppe

Thomas Blaney
3741 Windscape Ave
Oklahoma City, OK 73179-3840

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Thomas Blaney

Bobie Johnson
4536 N Johnstown Ave
Tulsa, OK 74106-1310

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Bobie Johnson

Dohn Martin
PO Box 1163
Jenks, OK 74037-1163

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dohn Martin

Janice Hamilton
380 N Banner Rd
El Reno, OK 73036-9173

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Janice Hamilton

Genni Davis
450 W 7th St Apt 1407
Tulsa, OK 74119-1048

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Genni Davis

Karla Hinton
13918 S 300th East Ave
Coweta, OK 74429-7825

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

My husband has heart disease and I now have asthma, so this issue is VERY important to me!

Sincerely,
Karla Hinton

Douglas Devers
320 N Whitaker St
Pryor, OK 74361-2024
(918) 530-7379

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Douglas Devers

Kelley Smith
4616 Eastman Dr
Oklahoma City, OK 73122-7614
(405) 720-7310

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kelley Smith

Stephanie Wegner
PO Box 133
Olustee, OK 73560-0133

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Stephanie Wegner

Ben Zoeller
7601 Clayton Dr
Oklahoma City, OK 73132-5638
(405) 621-5878

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ben Zoeller

David Aandrews
8944 N 138th East Ave
Owasso, OK 74055-2546
(918) 274-8015

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
David Aandrews

Maria Welding
3304 S New Haven Ave
Tulsa, OK 74135-4509
(908) 749-1020

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Maria Welding

Dawn Mahiya
222 NW 25th St
Oklahoma City, OK 73103-3002

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dawn Mahiya

Diane Perkins
11912 Ashford Dr
Yukon, OK 73099-8016
(405) 229-6147

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Diane Perkins

Dianne Wigley
6401 Applewood Dr
Edmond, OK 73034-9409
(405) 330-3578

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dianne Wigley

Gentry Golden
PO Box 720540
Norman, OK 73070-4396

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Gentry Golden

Robert Lifset
5001 Deerhurst Dr
Norman, OK 73072-3880
(405) 366-2111

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Robert Lifset

Frank Anderson
1424 NE 25th St
Moore, OK 73160-8953
(405) 703-1051

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Frank Anderson

Dionne Stafford
2104 Whiteoak Cir
Norman, OK 73071-1033

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dionne Stafford

Judy Ann Davis
3243 NW 50th St Apt 243
Oklahoma City, OK 73112-5370
(405) 943-0000

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Judy Ann Davis

Marianne Reichlin
5801 N Stonewall Dr
Oklahoma City, OK 73111-6737
(405) 424-7311

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Marianne Reichlin

Karen Fleming
6908 W 1st St
Tulsa, OK 74127-6605

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Karen Fleming

Marianne reichlin
5801 N Stonewall Dr
Oklahoma City, OK 73111-6737

May 16, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.
I approve this plan

Sincerely,
Marianne reichlin

Carla Wollard
2300 W Galveston St
Broken Arrow, OK 74012-3523
(918) 258-5781

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Carla Wollard

Patricia Taylor
3223 E 31st St Ste 211
Tulsa, OK 74105-2448
(918) 749-9131

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Patricia Taylor

John Valiulis
2660 S Utica Ave
Tulsa, OK 74114-2806
(918) 747-4008

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
John Valiulis

Sherilyn Davis
4514 E 8th St
Tulsa, OK 74112-4206
(615) 871-9273

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Sincerely,
Sherilyn Davis

Sherilyn Davis
4514 E 8th St
Tulsa, OK 74112-4206
(615) 871-9273

May 16, 2013

Cheryl Bradley
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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sherilyn Davis

Katherine Hamilton M.Ed
1739 E 8th St
Tulsa, OK 74104-3207

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Katherine Hamilton M.Ed

Linda Gibson
5921 N Sterling Dr
Oklahoma City, OK 73122-7537
(405) 722-5224

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Linda Gibson

Brenda Evans
5107 E 27th Pl
Tulsa, OK 74114-4911
(918) 814-0310

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Brenda Evans

Joe Sibiski
629 Barbour Ave
Norman, OK 73069-7416
(405) 364-5759

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Joe Sibiski

Carol Humphrey
4010 N Aydelotte Ave
Shawnee, OK 74804-1622
(405) 275-8463

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Carol Humphrey

Gracen Johnsen
2300 NW 52nd St
Oklahoma City, OK 73112-8076

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Gracen Johnsen

Jennifer Pitts
409 S 39th West Ave
Tulsa, OK 74127-8211

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jennifer Pitts

Mary S. Brown
6500 NW 113th St
Oklahoma City, OK 73162-2903

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mary S. Brown

Cynthia Burnett
2115 Bentham Pl
Yukon, OK 73099-7901

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Cynthia Burnett

Jay Gann
2300 NW 52nd St
Oklahoma City, OK 73112-8076

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan, because we can make a cleaner future for Oklahoma.

Sincerely,
Jay Gann

Kathy Scurlock
3333 NW 20th St
Oklahoma City, OK 73107-3005
(405) 942-6343

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kathy Scurlock

Esther Hutchens
2110 S August St
Stillwater, OK 74074-2185
(405) 880-7922

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

Phasing out the two coal units will ultimately eliminate over 7 million tons of carbon dioxide, over 23,000 tons of sulfur dioxide, 13,000 tons of nitrogen oxide and over 200 pounds of mercury associated with the plant. This will protect the health of Oklahoma families and communities. The timeline for this plan is reasonable and achievable and allows for PSO to continue providing reliable power and meet the needs of its customers.

Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Esther Hutchens

Marjorie Hass
820 Lehigh Ave
Hartshorne, OK 74547-3630
(918) 297-2732

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Marjorie Hass

Lonney Corder-Agnew
4417 N Indiana Ave
Oklahoma City, OK 73118-2221
(405) 605-4343

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Lonney Corder-Agnew

Diane Hardersem
1529 Canterbury St
Norman, OK 73069-7496
(405) 364-3720

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Diane Hardersem

Ann Martin
2104 Goodrich Dr
Moore, OK 73170-7402
(405) 799-6888

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Ann Martin

Jessica Pynn
710 1/2 SW A Ave
Apt A
Lawton, OK 73501-3932
(580) 647-3387

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jessica Pynn

Jessica Pynn
710 1/2 SW A Ave
Apt A
Lawton, OK 73501-3932
(580) 647-3387

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jessica Pynn

Steve Trammell
10137 Bryan Rd
Meeker, OK 74855-9379
(405) 395-2219

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Steve Trammell

Jerry Gowman
6805 N. Stawley
Oklahoma City, OK 73132
(405) 721-3533

May 16, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Jerry Gowman

Linda Bracken
5921 Martin Ln
Bartlesville, OK 74006-8017
(918) 333-0933

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Linda Bracken

Eddy Collins
4021 Milford Pl
Norman, OK 73072-1772

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Eddy Collins

Montie Jones
PO Box 112
Lawton, OK 73502-0112
(580) 355-1549

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Montie Jones

Hannah Harder
1319 Sunset Dr
Norman, OK 73069-5352

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

As an environmental science professional, I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

The plan paves the way for resolving long-standing public health concerns about pollution from PSO's Northeastern Plant. I urge the approval and submittal of this revision to the Environmental Protection Agency.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Hannah Harder

Randy Smith
1820 SW 18th St
Oklahoma City, OK 73108-6840
(405) 631-6840

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Randy Smith

Gwen Ingram
208 E Broadway St
Drumright, OK 74030-3804
(918) 606-1556

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Gwen Ingram

Dr. Max Edgar
4617 N Miller Ave
Oklahoma City, OK 73112-8238

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dr. Max Edgar

Michael Oblander
3706 Reid Pryor Rd
Norman, OK 73072-5070
(405) 535-7649

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Michael Oblander

Paula Wolf
2821 Weymouth Way
Norman, OK 73071-7273

May 17, 2013

Cheryl Bradley
OK

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Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Paula Wolf

Susan Murray
15840 High Ave
Purcell, OK 73080-4470

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Susan Murray

Kelsi Starling
1800 Beaumont Dr Apt 222
Norman, OK 73071-2282
(918) 470-5911

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Kelsi Starling

Joel Olson
1305 S Broadway St
Moore, OK 73160-5328

May 17, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Joel Olson

Linda Burns
7541 NW 116th St
Oklahoma City, OK 73162-1336
(405) 721-7510

May 18, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Linda Burns

Dianne Miller-Boyle
514 NW 43rd St
Oklahoma City, OK 73118-7008
(405) 528-8988

May 18, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Dianne Miller-Boyle

Timothy Bradford
10401 N Midwest Blvd
Jones, OK 73049-5815

May 19, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Timothy Bradford

Deborah Smith
3044 NW 30th St
Oklahoma City, OK 73112-6908
(405) 942-6953

May 19, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

PLEASE READ AND TAKE NOTE!!

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Deborah Smith

Barry Hays
8720 E 28th Pl
Tulsa, OK 74129-6613

May 19, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Barry Hays

Preston Drake
13930 Edmond Lake Rd
Jones, OK 73049-3434

May 19, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

And please, recognize the potential advantages of renewable energy to our state - if we become a leading force in developing renewable energy, we will see great economic benefit to our state. Much greater than if we resist the change and follow the rest of the country 100 years from now. There's no time like the present.

Sincerely,
Preston Drake

Vicki Muir
1901 Bella Vista Dr
Edmond, OK 73013-6032
(405) 359-4878

May 20, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Vicki Muir

Livvy Jones
PO Box 9
Pauls Valley, OK 73075-0009
(405) 207-7639

May 20, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Livvy Jones

Mona Chamhidray
2930 N Shartel Ave
Oklahoma City, OK 73103-1034

May 20, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Mona Chamhidray

Sarah Lilly
11901 E Draper Ave
Choctaw, OK 73020-8257
(405) 769-1117

May 20, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

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Please promptly finalize the proposed State Implementation Plan.

Sincerely,
Sarah Lilly

Marilyn Masterson
2818 E 90th St
Unit 1105
Tulsa, OK 74137-3392
(918) 299-3142

May 20, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

I support the revised implementation plan that helps the Public Service Company of Oklahoma (PSO) comply with important health safeguards and the regional haze rule.

I often wonder HOW THIS MIGHT IMPROVE MY HEALTH. AND IF AUTO IMMUNE DISEASES MIGHT BE CAUSED BY POLLUTION..

Please make this happen.. it could only improve things.

Sincerely,

Mari Masterson
2818 E 90 St Unit 1105
Tulsa, Ok 74137

Sincerely,
Marilyn Masterson

Joel Olson
1305 S Broadway St
Moore, OK 73160-5328

May 20, 2013

Cheryl Bradley
OK

Subject: Re: revised SIP

Dear Cheryl Bradley,

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Sincerely,
Joel Olson