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TRANSCRIPT OF PROCEEDINGS
OF THE REVISION TO THE
REGIONAL HAZE SIP
INCLUDING REVISIONS TO AFFECTED
PORTIONS OF THE INTERSTATE
TRANSPORT SIP FOR THE
1997 8-HOUR OZONE
AND 1997 PM2.5 NAAQS
ON MAY 20, 2013, AT 1:00 P.M.
IN OKLAHOMA CITY, OKLAHOMA

* * * * *

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1 PRESENT
2 (See sign-in page)

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1 the Lawton Constitution and the
2 Oklahoman newspapers on April 19,
3 2013. Notice was also provided
4 through a posting on the DEQ website
5 on April 18, 2013.
6 This hearing is being conducted
7 for the purpose of receiving comments
8 on the proposed revision to the
9 Regional Haze State Implementation
10 Plan, including revisions to portions
11 of the Interstate Transport SIP for
12 the 1997 8-hour Ozone and the 1997
13 PM2.5 NAAQS as provided in 40 CFR
14 Section 51.102 and the U.S.
15 Environmental Protection Agency
16 regulations.
17 The proposed plan revision has
18 been available for inspection by the
19 public since April 18, 2013.
20 DEQ will accept written and
21 oral comments on the proposed SIP
22 revision until the close of today's
23 hearing. If you wish to make a
24 statement today, it is very important
25 that you complete the form provided

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1 PROCEEDING
2 MS. BOTCHLET-SMITH: Before
3 we get started, I want to remind
4 everyone to please turn off your cell
5 phones or put them on silent.
6 Good afternoon. I'm Beverly
7 Botchlet-Smith, Assistant Director of
8 the Air Quality Division, and I'm
9 going to serve as Protocol Officer
10 for today's hearing.
11 The hearing will be convened by
12 the Department of Environmental
13 Quality in compliance with Title 40
14 of the Code of Federal Regulations
15 Part 51 as well as the authority of
16 Title 27A of the Oklahoma statutes,
17 Sections 2-5-101 through 2-5-117.
18 DEQ is given the primary
19 responsibility and authority to
20 prepare and implement Oklahoma's Air
21 Quality Management Plan, compiled in
22 40 CFR Part 52, Subpart LL.
23 Notices for this hearing were
24 published in the Tulsa World
25 Newspaper on April 18, 2013, and in

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1 at the registration table. You will
2 be called upon at the appropriate
3 time and we ask that all commenters
4 please come to the podium to make
5 your comments and state your name and
6 affiliation for the record.
7 It will be necessary to limit
8 the time for each commenter to make
9 his or her oral comments to five
10 minutes. This is so all who wish to
11 speak today will have the opportunity
12 to do so. Any comments received
13 prior to the close of this hearing
14 will be made part of the hearing
15 record and considered in developing
16 the Agency's submission to EPA;
17 however, DEQ staff will not be
18 providing responses to any comments
19 during the hearing. All comments and
20 any Agency responses will be included
21 in the SIP revision submitted to EPA.
22 At this time, we would like to
23 proceed with the hearing. Mr. Robert
24 Singletary, who is the Environmental
25 Attorney Supervisor, will give DEQ's

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1 presentation.
2 Rob.
3 MR. SINGLETARY: Ladies and
4 gentlemen, good afternoon. Today I
5 plan to provide some general
6 background and a brief introduction
7 to the State Implementation Plan
8 revision that the Agency is receiving
9 comments on today; however, first I
10 have been asked to mention that the
11 DEQ did recently receive a request
12 from the Oklahoma Attorney General's
13 office to delay today's public
14 hearing based on the possibility of
15 some new information related to PSO's
16 2012 Integrated Resource Plan.
17 After consultation with the
18 Secretary of Environment's office and
19 in light of the State's obligations
20 under a Settlement Agreement, that
21 I'll discuss in a little bit more
22 detail in just a moment, the decision
23 was made to proceed with today's
24 public hearing as scheduled.
25 The purpose of today's public

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1 hearing is to solicit public comment
2 on the proposed SIP revision. All
3 relevant comment that is received,
4 including any new information, will
5 be considered and will be part of
6 the decision making process.
7 Additionally, in regard to any
8 new information related to an
9 Integrated Resource Plan, DEQ
10 recognizes that the Oklahoma
11 Corporation Commission is the State
12 agency with the authority and the
13 expertise to evaluate such a plan and
14 has full confidence that the
15 Corporation Commission will
16 appropriately address any information
17 that is presented in that regard.
18 So to begin with the background
19 on the Regional Haze SIP. The
20 Federal Clean Air Act establishes a
21 national goal of returning Class I
22 Federal areas to their natural
23 visibility conditions. Class I
24 areas, for those of you who don't
25 know, are national parks, national

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1 wildlife areas and national
2 wilderness areas.
3 In Oklahoma, we only have one
4 such area and that is the Wichita
5 Mountains National Wildlife Refuge
6 located in Comanche County. Even
7 though Oklahoma has only one of these
8 areas in the State, there are several
9 Class I areas located in nearby
10 states that are impacted by the
11 emissions from sources that are
12 located in Oklahoma.
13 As directed by Congress, EPA
14 regulations require States to
15 develop, and submit for approval,
16 Regional Haze State Implementation
17 Plans that are designed to reduce
18 pollutants that cause visibility
19 impairment and to return these Class
20 I federal areas to their natural
21 visibility conditions by 2064.
22 As part of the SIP development
23 process, EPA regulations mandate that
24 States require certain older
25 facilities that have significant

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1 sulfur dioxide, nitrogen oxide, or
2 particulate matter emissions, to
3 install and operate what is referred
4 to as BART, which stands for the
5 Best Available Retrofit Technology.
6 Only sources that meet certain
7 criteria established in Federal
8 regulations and which cause or
9 contribute to visibility impairment
10 at a Class I area are subject to
11 these BART requirements.
12 DEQ determined that there are
13 only 20 sources in Oklahoma that meet
14 these Federal criteria. Of those 20
15 sources only six were determined to
16 significantly cause or contribute to
17 visibility impairment at a Class I
18 area. What that means is there are
19 only six sources located in Oklahoma
20 that are subject to these BART
21 requirements. Three of the sources
22 are coal-fired electric generating
23 facilities. One of these is owned
24 by PSO. The PSO facility at issue
25 here is the Northeastern Power

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1 Station that is located in Rogers
2 County and includes two coal-fired
3 units.

4 Several years ago, the DEQ
5 developed a Regional Haze SIP
6 revision which included BART
7 determinations for these units. The
8 original SIP revision was submitted
9 to EPA back in February of 2010.

10 In December of 2011, EPA
11 approved much of Oklahoma's original
12 submission; however, there were some
13 significant aspects of that plan that
14 were disapproved, including specific
15 BART determinations that related to
16 these coal-fired units and some
17 emission limits that were associated
18 with those BART determinations.

19 Along with that disapproval,
20 EPA promulgated a Federal
21 Implementation Plan, or a FIP, for
22 these coal-fired units. The FIP
23 essentially required the installation
24 and the operation of dry flue gas
25 desulfurization which is a control

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1 technology that's commonly referred
2 to as a "dry scrubber". These dry
3 scrubbers were to be installed within
4 5 years of promulgation of the FIP.

5 The disapproval and the FIP
6 have been challenged by the Oklahoma
7 Attorney General, by OG&E, and by
8 PSO. These judicial challenges are
9 currently pending before the 10th
10 Circuit Court of Appeals.

11 At the same time, Secretary
12 Sheerer, the Oklahoma Secretary of
13 Environment, and DEQ, have worked
14 together with PSO to develop a
15 practical alternative to the
16 requirements of the FIP, at least as
17 they apply the coal-fired units that
18 are operated by PSO.

19 The framework for this
20 alternative formed the basis of a
21 settlement agreement that was entered
22 into by the Secretary of Environment,
23 by DEQ, by PSO, by EPA, by the DOJ,
24 and by the Sierra Club.

25 As part of that settlement

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1 agreement PSO's judicial challenge to
2 EPA's FIP is being held in abeyance
3 pending the implementation of the
4 agreement.

5 The proposed SIP revision is
6 consistent with the terms of that
7 settlement agreement and generally
8 provide PSO with the flexibility of
9 utilizing a combination of different
10 emission control technologies such as
11 dry sorbent injection, activated
12 carbon injection, and fabric
13 baghouses on one of their units; as
14 well as an incremental decrease in
15 the capacity utilization of that
16 unit. And it also includes
17 reductions in the operating life span
18 of each of the coal-fired units.

19 In essence, the proposal
20 provides PSO with a more holistic
21 approach that is designed to meet not
22 only the Regional Haze requirements,
23 but also to assist the company in
24 meeting new regulatory challenges
25 that are currently facing the utility

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1 industry.

2 In addition to satisfying
3 Oklahoma's Regional Haze SIP
4 obligations for these two PSO units,
5 this SIP revision is also intended to
6 satisfy Oklahoma's Interstate
7 Transport SIP obligations as it
8 relates to these two coal-fired
9 units.

10 On March 20, 2013, Secretary
11 Sherrer submitted this proposed SIP
12 revision to EPA for approval along
13 with a request for parallel
14 processing. As required by law, the
15 proposed SIP revision has been
16 available for public comment for more
17 than 30 days. Notice, again, was
18 published on April 18th in the Tulsa
19 World, and April 19th in the
20 Oklahoman and the Lawton
21 Constitution. Again, the public
22 comment period is going to close at
23 the conclusion of today's public
24 hearing.

25 Once these comments have been

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1 considered and revised, a final SIP
2 submission will be submitted to EPA
3 for review. As part of that review
4 process EPA will provide a separate
5 public comment period, and a notice,
6 of which, should be provided in the
7 Federal Register.

8 Again, if you would like to
9 provide oral comment today, please
10 fill out one of the comment forms on
11 the table located outside the room.

12 With that, I believe, we are
13 ready to proceed with the hearing.

14 MS. BOTCHLET-SMITH:
15 Secretary Sherrer.

16 SECRETARY SHERRER: Good
17 afternoon. Thank you for the
18 opportunity to provide comments
19 today.

20 My name is Gary Sherrer, and I
21 service as Oklahoma Secretary of the
22 Environment.

23 In March of 2011, the
24 Environmental Protection Agency, EPA,
25 announced its intention to partially

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1 approve and partially disapprove
2 Oklahoma State Implementation Plan,
3 the SIP, to come into compliance with
4 the Regional Haze Rule, and to
5 promulgate a Federal Implementation
6 Plan, the FIP. Within days I was
7 asked by Governor Mary Fallin to work
8 with the affected utilities to try to
9 develop an Oklahoma-based solution
10 that achieved regulatory compliance,
11 while also addressing concerns of the
12 utilities, recognizing the unique
13 nature of their generation structure
14 and their customer needs.

15 AEP/PSO contacted my office and
16 expressed an interest in working to
17 develop an alternative to the FIP.
18 AEP/PSO wished to work on a plan to
19 achieve compliance with the Regional
20 Haze Rule and a number of other air
21 rules that were at various stages of
22 development.

23 For over a year my staff and I
24 worked with representatives of
25 AEP/PSO and the Oklahoma Department

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1 of Environmental Quality to develop
2 an Oklahoma plan. This plan was
3 memorialized as the final settlement
4 agreement that was announced by
5 Governor Fallin in April of 2012 and
6 formally signed last fall, which
7 called for the development of the new
8 SIP for AEP/PSO that is being
9 considered today.

10 I am pleased to say that this
11 settlement agreement that was reached
12 allows AEP/PSO the ability to chart
13 their own course and identify
14 emission control technologies that
15 work best for their plant, rather
16 than installing dry scrubbers as
17 called for in the FIP, while also
18 providing regulatory certainty in
19 planning for compliance with future
20 air rules.

21 After extensive modeling of the
22 Oklahoma plan, we have been able to
23 determine that these technologies
24 provide for comparable results and
25 meet all requirements set out in the

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1 Regional Haze Rule. This
2 Oklahoma-based plan and the resulting
3 SIP were carefully crafted and vetted
4 to be in both technical and legal
5 compliance with the Clean Air Act and
6 to serve as the replacement for the
7 FIP. This SIP allows for compliance,
8 while also putting AEP/PSO on a path
9 that works best for them and their
10 customers.

11 In addition to meeting Regional
12 Haze requirements, the settlement
13 agreement also is designed to bring
14 AEP/PSO into compliance with the
15 Mercury and Air Toxic Rules and
16 various other air rules.

17 Once again, thank you for the
18 opportunity to provide comments
19 today.

20 In closing, I want to emphasize
21 that I believe that the proposed SIP
22 is in full compliance with the Clean
23 Air Act and the signed settlement
24 agreement and I look forward to it
25 being delivered to EPA for their

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1 review.
2 And to make a statement, on a
3 personal note, this agreement took
4 over a year for us to work out with
5 EPA. It was a very hard settlement
6 to work out, but I honestly believe
7 that this settlement is in the best
8 interest of AEP/PSO and also the
9 customers of Oklahoma. There may be
10 some who will give comments today and
11 possibly try to blur some compliance
12 rules of cost, which is clearly under
13 the jurisdiction of the Corporation
14 Commission and the environmental
15 rules which clearly are to be
16 determined through this setting.

17 So, again, thank you so much
18 for the privilege of presenting these
19 comments today.

20 MS. BOTCHLET-SMITH: Mr.
21 John Dirickson.

22 MR. DIRICKSON: I was hoping
23 I would be last. My name is John
24 Dirickson. I'm from the City of
25 Oologah. Public Service has been a

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1 that came out. In fact, some of
2 them fluctuated so much it was almost
3 impossible to keep up with them. If
4 we continue on at a rate like that
5 it would be very difficult even for
6 them to comply with the ones that
7 has been set before you today. But
8 Public Service has been a -- a good
9 partner for the City of Oologah and
10 they are making sure that its
11 customers have a sufficient supply of
12 power now and in the future. No one
13 else has the legal obligation to
14 serve PSO customers and no one else
15 will be accountable -- held
16 accountable. If sufficient
17 generation is not available and
18 customers lights go dark, PSO has
19 fulfilled its obligation in a cost
20 effective way for 100 years. And
21 this environmental compliance plan
22 represents the company's collective
23 approach to meeting that obligation
24 at this time.

25 So I guess you can assume from

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1 good partner with the City of Oologah
2 over the years. They have been a
3 reliable and trusted partner with the
4 City and we -- we have a great
5 school, which we feel like that
6 Public Service -- they didn't build
7 it but the tax-base that they
8 generated certainly did. We have an
9 ambulance, fire department, and
10 things of that nature that just --
11 of course, we do believe that Public
12 Service has to comply with
13 Environmental Protection Agency rules
14 and regulations. However, it would
15 be my concern, also, that eventually
16 the rates would get so high that
17 they would affect communities like
18 ours, which is small and has a lot
19 of retired people. So be that as it
20 may, Public Service has certainly --
21 and the fact of the matter is I'm a
22 retired PSO employee and I know that
23 over the years that they did
24 everything that they could to comply
25 with every environmental standard

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1 my statement here that we are for
2 and in support of Public Service and
3 their rehab plan, as they have a
4 plan with the Environmental
5 Protection Agency. Thank you.

6 MS. BOTCHLET-SMITH: Thank
7 you. Mr. Dirickson, did you also
8 have written comments for me?

9 MR. DIRICKSON: No.
10 MS. BOTCHLET-SMITH: Okay.

11 Thank you.

12 MR. DIRICKSON: They're all
13 (inaudible).

14 MS. BOTCHLET-SMITH: Mr. Tom
15 Schroedter.

16 MR. SCHROEDTER: Good
17 afternoon. My name is Tom
18 Schroedter. I'm the Executive
19 Director of Oklahoma Industrial
20 Energy Consumers, otherwise known as
21 OIEC, an unincorporated association
22 of large consumers of energy with
23 facilities located throughout
24 Oklahoma. OIEC consists of over 20
25 member companies that have operations

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1 throughout the State. Many of our
2 members are engaged in energy
3 price-sensitive industries such as
4 pulp and paper, cement, refining,
5 glass, industrial gases, and film.
6 OIEC Members employ thousands of
7 Oklahomans.
8 I'm here today to represent
9 OIEC and express OIEC's opposition to
10 the revised State Implementation Plan
11 or SIP that has recently been
12 developed and proposed by the
13 Oklahoma Department of Environmental
14 Quality. OIEC has also filed
15 comments in this case. They are
16 already part of the public record so
17 my remarks this afternoon are
18 intended to summarize those comments.
19 Initially I want to say that
20 OIEC finds itself in an awkward
21 position today in opposing DEQ's
22 revised SIP. Our members work
23 closely with DEQ and hold the Agency
24 and its staff in high regard.
25 However, and much to our dismay, DEQ

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1 has developed a SIP which is both
2 technically and legally flawed and
3 which will result in a rate shock
4 for PSO rate payers. Therefore, OIEC
5 must voice its strong opposition to
6 the SIP.
7 Before I list the reasons why
8 we oppose you should know that the
9 SIP is based on a settlement
10 agreement among PSO, EPA, Sierra
11 Club, and others that was developed
12 and consummated with virtually no
13 input from PSO's customers who are
14 being asked to pay for the billions
15 of dollars of implementation cost of
16 the plan. If approved and
17 implemented this SIP will result in
18 the largest single rate increase, to
19 my knowledge, ever, for PSO's
20 customers in the company's 100 year
21 history. You cannot overlook that or
22 dismiss that. To ensure economic
23 growth and prosperity in our state
24 PSO's rates must remain at their
25 lowest reasonable level. It's

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1 critical that industries remain
2 competitive within industries
3 elsewhere, outside Oklahoma, so that
4 our state's economy will grow and
5 prosper and not shrink.
6 As I stated, the DEQ revised
7 SIP is technically and legally
8 deficient for a number of reasons.
9 First, the proposal to retire
10 both of PSO's coal-fired generating
11 units simply cannot be the Best
12 Available Retrofit Technology
13 pursuant to the rules of the EPA.
14 In fact, BART -- EPA's BART
15 guidelines provide that BART cannot
16 be conversion of a coal plant to
17 natural gas because conversion is not
18 retrofitting. For similar reasons,
19 mandating the early retirement of a
20 coal generating facility to achieve
21 emission reductions cannot be BART.
22 Not only would there be no
23 retrofitting, there's no facility.
24 Accordingly the DEQ SIP, which
25 requires retirement of the units, is

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1 not BART.
2 Second, even if the mandate of
3 the early retirement of PSO's coal
4 units could be considered as BART it
5 was err not to consider cost of
6 compliance as required by federal
7 regulations. The omitted compliance
8 cost of the revised SIP include the
9 cost -- must include the cost of
10 replacement capacity in energy which
11 result from the retirement of these
12 coal units. The DEQ SIP ignored the
13 replacement and capacity energy costs
14 arising from these requirements. So
15 the cost of the DEQ SIP is
16 understated by around 262 million
17 dollars a year. If you add that 262
18 million to the DEQ's 25 million
19 dollar cost estimate, you get a total
20 compliance cost estimate of 287
21 million dollars per year. That
22 amount is more than six times the
23 cost estimate for the scrubber
24 retrofit option which is set forth in
25 the EPA FIP.

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1 MS. MARSHMENT: Thirty
2 seconds.

3 MR. SCHROEDTER: So to
4 conclude, we would -- we would state
5 that the SIP is technically
6 deficient; it's legally deficient.
7 It does not meet the criteria
8 established by EPA for approval as
9 BART or as an alternative to BART,
10 and is clearly not in the interest
11 of PSO's rate payers.

12 I might add that the DEQ SIP
13 never published or posted the entire
14 settlement agreement that was an
15 exhibit -- should have been an
16 exhibit to the -- to DEQ's filing.
17 That also may be a violation of the
18 Open Meeting Act which means the DEQ
19 must withdraw the proposal.

20 So in the view of OIEC the SIP
21 must be redrawn -- withdrawn and
22 reconsidered at a later date. Thank
23 you.

24 MS. BOTCHLET-SMITH: Thank
25 you, Mr. Schroedter. Did you have

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1 Implementation Plan are an Oklahoma
2 solution. As the Secretary
3 mentioned, the State received a
4 Federal Implementation Plan and not
5 only did we know, the DEQ know, the
6 Governor knew, the Secretary of
7 Energy, and the Secretary of
8 Environment knew that we could come
9 up with a better plan than to just
10 accept what the Federal
11 Implementation Plan required us to
12 do. So we started working at the
13 invitation of the Secretary of Energy
14 and Secretary of Environment; we
15 started working with them to develop
16 the Oklahoma solution. And we knew
17 that we could come up with something
18 that was better, lower cost, better
19 for our customers, better for our
20 company than installing 800 million
21 dollars or so worth of control
22 equipment on 30-plus-year-old coal
23 units. And so we entered into this
24 discussion and working on a plan,
25 which we considered a no-regret

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1 written comments to provide today?
2 MR. SCHROEDTER: Yes, I do.
3 We submitted our written comments on
4 Friday, I believe.

5 MS. BOTCHLET-SMITH: All
6 right. Thank you, very much.

7 Mr. Bud Ground.

8 MR. GROUND: Good morning.

9 I'm Bud Ground. I'm Manager of
10 Governmental and Environmental
11 Affairs for Public Service Company of
12 Oklahoma. And I have some comments,
13 but due to the shortening of time
14 I'm also going to present in the
15 testimony a document that will
16 supplement what I'm going to say.

17 Speaking of our revised SIP,
18 you've heard it much more eloquently
19 than I can speak. Rob Singletary
20 described the issue. Secretary
21 Sherrer described the issue. And to
22 add on to that I'd like to just say
23 that PSO's environmental compliance
24 plan, which is what we call this
25 plan and the revised State

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1 situation and if it got to a point
2 where it was not good for us we
3 could get out of it. And we took --
4 we developed this plan with the DEQ,
5 and Secretary of Environment,
6 Secretary of Energy, with the
7 consultation even of the Attorney
8 General and the Governor at the time,
9 and we took that plan to EPA. Now
10 EPA -- this was not a plan that
11 they, some might say forced on our
12 company to do, this is something that
13 we took to them as a plan and then
14 negotiated with them on the results.

15 So when this -- the FIP was
16 actually -- it was in March of 2011
17 when the FIP was actually submitted
18 and partially approved and partially
19 disapproved, and we took that -- the
20 approval part of that and we started
21 on our NOx controls for, not only
22 that coal-unit or coal units, but
23 also the gas units that were affected
24 by it.

25 And through this, PSO chose to

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1 participate in this plan. It wasn't
2 something that we were forced to do,
3 it was something that we were asked
4 to do and decided this was the best
5 for our company. And this worked
6 out that the PSO plan -- when we
7 took it to EPA for -- and started
8 into negotiations it was difficult at
9 first for them to understand how this
10 all would work on a negotiated issue
11 but we worked as, Secretary Sherrer
12 said, for over a year and finally
13 had enough discussions where they saw
14 it was -- met the requirements of
15 BART, met the requirements of the
16 SIP. And we also wanted to make
17 sure that it not only met the
18 requirements of the Regional Haze
19 Rule but, for us, for PSO, it had to
20 also meet the requirements of the
21 mercury and air toxics rule which is
22 just being promulgated. So we wanted
23 to make sure that we didn't have to
24 come back and do any further control
25 equipment on units that through this

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1 plan were going to be retired in a
2 specific amount of time. We made
3 sure that it was not only a Regional
4 Haze plan but it was a plan that met
5 NAAQS as well; and in taking care of
6 those two, it also would take care
7 of many other issues -- air and
8 water issues and solid waste issues
9 that would be coming up in the very
10 near future within the EPA.
11 This environmental control plan
12 provides for environmental benefits
13 while ensuring the continued
14 reliability and mitigating risks for
15 future environmental regulations, as
16 I just spoke. And instead of
17 spending, like, the 800 million
18 dollars, we would spend about 650
19 million less than that to comply with
20 these regulations. And as you know
21 we plan to retire these units in
22 2016, and then 2026 on the second
23 unit. And this transition from coal
24 to gas will reduce not only our SO2
25 emissions but our particulate

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1 emissions and the NOx emissions as
2 well. So not only is this
3 environmentally responsible, it is a
4 PSO and Oklahoma solution to these
5 requirements. It's also the best
6 tool for our customers. This plan
7 does avoid very large capital costs
8 on units that are greater than 30
9 years old.
10 And as a last comment, I'll
11 add to what Mr. Dirickson said.
12 PSO, on the 29th of this month, will
13 be 100 years old as an Oklahoma
14 Corporation. So we actually were in
15 the state prior to that but we will
16 be a low cost, low provider --
17 (inaudible) low-cost provider for
18 over 100 years in Oklahoma.
19 Thank you.
20 MS. BOTCHLET-SMITH: Thank
21 you. Did you have written comments?
22 MR. GROUND: I do.
23 MS. BOTCHLET-SMITH: Bob
24 Rounsavell.
25 MR. ROUNSAVELL: My name is

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1 Bob Rounsavell. I'm here today as a
2 resident of Oologah, Oklahoma. I am
3 also a Sierra Club Member and as
4 President of the Carrie Dickerson
5 Foundation.
6 I think this agreement reached
7 between PSO and EPA, Oklahoma, and
8 Sierra Club is a great start in
9 improving our air quality. Although
10 I wish that the second coal-fired
11 unit could be phased out much sooner
12 than 2026. I realize, none the
13 less, the most important significance
14 is the collaboration here by these
15 stakeholders in reaching this
16 agreement.
17 The agreement will bring about
18 environmental benefits resulting in
19 significant health benefits. By 2026
20 sulfur dioxide emissions from the
21 northeastern plant will be
22 eliminated. Elimination of mercury
23 and other toxins from burning coal
24 will also be eliminated and will help
25 improve health conditions, especially

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1 for Oologah residents. Mercury may
2 very well have been the cause of my
3 wife's colon cancer after residing
4 for a decade only a mile from the
5 two coal units and half a mile from
6 the train tracks with the many coal
7 trains we have every week.
8 Fortunately, her indomitable spirit
9 prevailed.

10 And then we have carbon
11 dioxide, CO2. Reducing CO2, which
12 this agreement will accomplish, is
13 going to greatly improve chances for
14 human survival. Unfortunately, many
15 are still in denial about this
16 well-researched phenomenon of global
17 warming, which CO2 is the principal
18 reason.

19 Economically the PSO rate plan
20 is most beneficial as it offers the
21 lowest impacts on commercial,
22 industrial and residential customers.

23 I understand that some large
24 industrial users want scrubbers
25 installed so the coal units can

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1 continue operating until 2041, thus,
2 extending the dirty emissions while
3 reaping high profits.

4 The plan paves the way for
5 solving public health concerns about
6 pollution from burning coal. I live
7 near the northeastern plant and it's
8 high time my health was protected.

9 ODEQ should approve the PSO
10 plan. It's cleaner, it will support
11 Oklahoma jobs, and it will keep
12 ratepayer money closer to home. If
13 you live in Oologah, own a white
14 motor vehicle and leave the windows
15 in your house open, then you have
16 problems. I can go outside many
17 days and write my name on my white
18 car. Leaving the windows open for
19 fresh air invites a whole bunch of
20 coal dust inside the house. This
21 soot coming into the house is not
22 the same as normal dust; it's highly
23 toxic. This plan is a necessary
24 start to improving air quality for
25 our future.

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1 Carrie Dickerson saw the need
2 for cleaner, renewable energy sources
3 which we have in abundance in our
4 state. She spent much of her life
5 promoting clean, renewable energy,
6 especially wind power.

7 So as President of the Carrie
8 Dickerson Foundation and on its
9 behalf, I thank PSO, Oklahoma, EPA
10 and Sierra Club for having the
11 courage and foresight to change the
12 status quo. We'll all live longer
13 because of this proposed plan.
14 Thank you for this opportunity.

15 MS. BOTCHLET-SMITH: Mr. Jon
16 Laash.

17 MR. LAASH: Thank you. I'm
18 here on behalf of myself and Cheryl
19 Bought (phonetic), and we're here for
20 Dogwood Energy, LLC.

21 In addition to the written
22 comments we've submitted, and another
23 copy of which I'll submit at the
24 conclusion, I just briefly want to
25 summarize the written information

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1 we've submitted.

2 Dogwood Energy is a generator
3 of electric power, and appears today
4 in support of the proposed Regional
5 Haze SIP revision.

6 Dogwood submits that that the
7 SIP fully complies with the federal
8 requirements to reduce regional haze
9 and interstate pollution from the
10 Northeastern Coal-fired Plant in
11 Oologah, Oklahoma. The requirement
12 to retire one Northeastern plant
13 along with retrofits and a study ramp
14 done of capacity at the other is a
15 more cost-effective solution than
16 requiring the installation of
17 expensive scrubbers on both units.

18 The SIP revision is consistent
19 with the State of Oklahoma's energy
20 plan which prioritizes the increased
21 use of Oklahoma's energy resources
22 such as wind, and natural gas, and
23 the protection of public health in
24 the environment.

25 The SIP revision encourages use

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1 of Oklahoma resources and the
2 elimination of Northeastern's coal
3 plants, coal imports, by 2026.
4 Transitioning from coal to gas, wind,
5 energy efficiency, and man response,
6 also has significant benefits for the
7 overall reliability of the energy
8 grid.

9 As the amount of wind in
10 Oklahoma and southwest power pool
11 rises, fossil generation will need to
12 ramp up production and down more --
13 up and down more frequently and
14 shutdown for various periods of time
15 during high wind production. The
16 switching option, the result in
17 plants better suited to integrate
18 with variable wind generation both
19 technically and economically.

20 Oklahoma has the discretion to
21 choose the best option so long as it
22 has considered all relative factors
23 considered consistent with the BART
24 Guidelines and provided a
25 justification.

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1 Dogwood believes DEQ correctly
2 and justifiably chose the alternative
3 that provides for the gradual
4 phase-out of the Northeastern coal
5 units.

6 Dogwood supports the SIP
7 revision and urges DEQ to promptly
8 move forward with finalizing and
9 implementing the rule.

10 Thank you.

11 MS. BOTCHLET-SMITH: Mr. Lee
12 Paden.

13 MR. PADEN: Good afternoon.

14 My name is Lee Paden. I represent
15 an association called the Quality of
16 Service Coalition who consist of
17 consumers who primarily receive
18 electric service from Public Service
19 Company of Oklahoma. Majority of the
20 members of our association are
21 located in northeastern Oklahoma but
22 include members living in other parts
23 of the State as well.

24 Our membership includes
25 realtors, home and commercial

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1 builders, trade associations, cities,
2 towns where PSO provides electric
3 service, local banks, businesses and
4 individuals.

5 Our organization is concerned
6 with service quality, the impact of
7 rates on attraction and retention of
8 new and existing businesses and the
9 continued growth of our state.

10 I would be remised if I didn't
11 echo the comments of Mr. Schroedter
12 concerning the Department. I've had
13 the pleasure of serving as a part of
14 this Department's organization from
15 its inception until 2004. It's
16 composed of very competent and able
17 people and my remarks should not be
18 directed toward any particular
19 individual.

20 What we're here today to do is to
21 try to provide a technical analysis,
22 if you will, of the proposal that's
23 been made and the Quality Coalition
24 is going to do that.

25 We are opposed to the Proposed

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1 Regional Haze SIP Revision and in
2 submitting the following comments, we
3 strongly suggest that the proposal
4 does not conform to Federal and State
5 statutory and regulatory requirements
6 related to Regional Haze and, thus,
7 should be rejected as a reasonable
8 approach to implement control
9 technologies to achieve those goals
10 and objectives.

11 This proposal's attempt to
12 amend a previous Oklahoma State
13 Implementation Plan filed by ODEQ in
14 February of 2010, which proposed BART
15 for six generation facilities in
16 Oklahoma. Four of those generation
17 facilities, operated by Oklahoma Gas
18 and Electric, and two of the
19 facilities which are the subject of
20 this proposal by PSO. Public Service
21 Company of Oklahoma is an affiliate
22 of American Electric Power, which
23 owns public utilities operating in
24 Oklahoma, Texas, Louisiana, Arkansas,
25 Indiana, Michigan, Ohio, Kentucky,

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1 Virginia and West Virginia.
2 It is important to point out
3 that the February 2, 2010 ODEQ
4 Regional Haze Implementation Plan
5 Revision was filed using -- and this
6 is a quote from the document --
7 incomplete visibility data for 2001,
8 completed data for 2002-2004 and
9 provisional data for 2005 and 2006.
10 Baseline conditions represent the
11 average of 2002-2004 data.

12 In addition, ODEQ bases it
13 long-term strategy on an identified
14 baseline emissions inventory that is
15 also a 2002 inventory.

16 ODEQ is required to consider
17 and address the anticipated net
18 effect of visibility resulting from
19 changes projected in point, area, and
20 mobile source emissions by 2018. As
21 explained in the original SIP on Page
22 91, dated February 2, 2010, the
23 changes anticipated to occur will
24 result from population growth, land
25 management evolution, air pollution

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1 control, and development of industry,
2 energy and natural resources. There
3 is no indication in the most recently
4 filed Proposed Regional Haze
5 Implementation Plan Revision, that
6 DEQ used modeling data that contains
7 more updated emissions inventory
8 information. To establish emissions
9 projection in 2018 from the 2002
10 data, ODEQ, used CENRAP modeling
11 experience and developed an estimated
12 inventory for 2018. Quality of
13 Service Coalition respectfully
14 suggests that the use of data that
15 is outdated is inappropriate, it
16 requires additional data be supplied
17 and would suggest that more current
18 emissions data used in modeling to
19 determine that the projected regional
20 haze in 2018 regional haze statutes
21 is vitally important to the
22 consideration of whether or not this
23 SIP be adopted or not.

24 Only recently EPA recognized in
25 a decision that they're rendering on

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1 an Arizona submission, that updated
2 Regional Haze submission data is
3 important and is necessary in a 2008
4 inventory information submitted by
5 that agency.

6 The settlement incorporates a
7 variety of other things but I'd like
8 to, especially, address one issue.
9 Reasonable progress goals require
10 ODEQ to consider five factors in
11 determining reasonable progress.

12 Those five factors are cost of
13 compliance, time necessary for
14 compliance, energy effects of
15 compliance, non-air quality
16 environmental effects, and remaining
17 useful life.

18 It is Quality of Service's
19 opinion that factor number 3, energy
20 effects of compliance, if considered
21 at all, did not factor into
22 consideration of that requirement.

23 MS. BOTCHLET-SMITH: Mr.
24 Paden, your time is up. Can you
25 summarize very quickly?

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1 MR. PADEN: Okay. I will
2 be happy to.

3 Replacement energy when an
4 existing facility is retired is
5 essential to provide services to PSO
6 customers. That was not factored
7 into this process and should be.

8 We suggest that the Proposed
9 Regional Haze Plan does not meet the
10 statutory or regulatory requirements
11 necessary for approval for this
12 proposal, and we recommend that it be
13 rejected in the best interest of
14 Oklahoma customers of PSO, the state
15 of Oklahoma and all Oklahoma
16 citizens. Thank you.

17 MS. BOTCHLET-SMITH: Do you
18 have written comments?

19 MR. PADEN: Yes.

20 MS. BOTCHLET-SMITH: Thank
21 you, sir.

22 Ms. Susan Schmidt.

23 MS: SCHMIDT: My name is
24 Susan Schmidt, I'm a member of the
25 Sierra Club, and I support the SIP.

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1 In Oklahoma we are fortunate to
2 have an excellent wind corridor which
3 allows us to become a leader in wind
4 energy production. And we have
5 natural gas which can quickly ramp up
6 power to back up wind production.
7 It makes no sense for Oklahoma to
8 spend 63 million dollars a year to
9 import coal when wind is safe,
10 non-polluting, and the wind itself is
11 free. When we send our money to
12 Wyoming to buy coal, we import more
13 than coal. We import asthma,
14 bronchitis, heart attacks and death.
15 I would have carried in 200
16 pounds of sugar today to demonstrate
17 the amount of mercury being released
18 in Oklahoma's environment every year
19 from the Northeastern unit alone.
20 But 200 pounds is too great a burden
21 for me to carry. It is also too
22 great a burden for Oklahoma's
23 environment to carry. Just one gram
24 of mercury is enough to contaminate a
25 20-acre lake. The mercury threat

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1 from burning coal is not
2 hypothetical. The fish are already
3 poisoned in many of Oklahoma's lakes.
4 The Clean Air Act was signed
5 into law in 1963 to protect us, the
6 people. Some people complain that
7 when PSO is required to comply with
8 the Clean Air Act, the cost of doing
9 business responsibly will increase
10 customer costs. In its plan to
11 resolve the immediate haze problem by
12 shutting down the Northeast unit,
13 PSO estimates customers rates will
14 increase 9.7 percent. That 9.7
15 percent means less than a twelve
16 dollar increase per month for a
17 family like mine.
18 Burning coal is largely
19 responsible for global warming. And
20 global warming is responsible for the
21 increases in extreme weather we have
22 seen across Oklahoma and the country.
23 My home insurance paid \$38,000 to
24 replace the roof on my home, a room
25 on our shop, a garage door and some

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1 guttering in 2010.
2 We were lucky that, one, we
3 were not hurt; and, two, that all
4 the damage occurred in one claim.
5 Our friend's damage occurred in three
6 separate storms close together, which
7 resulted in their insurance being
8 cancelled even though they had been
9 with the company for many years
10 without claims. I called my
11 long-time insurance agent last week.
12 He said that previously,
13 "thunderstorms meant thunder, wind,
14 rain and maybe pea-size hail". Now
15 he said, almost every thunderstorm
16 brings large hail and tornadoes.
17 Yesterday we watched television for
18 hours as multiple huge E4 tornadoes,
19 at least one a mile wide, crossed
20 Oklahoma.
21 I say it's time we stop using
22 coal. It's better to spend a
23 relatively few dollars more for wind,
24 natural gas, and solar, rather than
25 repeatedly paying thousands of

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1 dollars to repair damage caused by a
2 world using too much coal.
3 And while the fear and worry
4 for loved ones is fresh in your mind
5 from yesterday's storms, remember
6 Hurricane Sandy last fall. Sandy
7 cost this nation billions of dollars
8 and lives lost. The increased rates
9 people gripe about today are chump
10 change compared to the consequences
11 we're seeing for years of harm to
12 the environment. It's time we factor
13 in the financial, medical, and
14 emotional consequences of global
15 warming.
16 PSO needs to follow-through
17 with the SIP to retire the
18 Northeastern unit by 2016 as agreed
19 and ramp up its plans to transition
20 away from coal. It's past time that
21 all utility companies embrace clean
22 energy. Thank you all.
23 MS. BOTCHLET-SMITH: Jamie
24 Maddy.
25 MR. MADDY: Thank you. My

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1 name is Jamie Maddy, Director of
2 Regulatory Affairs at Chesapeake
3 Energy, and I submit the following
4 comments in support of the Oklahoma
5 Department of Environmental Quality's
6 proposed revision to Oklahoma's
7 Regional Haze State Implementation
8 Plan.

9 Under the Oklahoma Clean Air
10 Act, DEQ is given primary authority
11 and responsibility for preparing and
12 implementing the air quality
13 management plan for our state. DEQ
14 originally prepared and submitted its
15 Regional Haze SIP in February of
16 2010. On January 27, 2012, EPA
17 accepted the majority of Oklahoma's
18 state plan, with a limited portion of
19 the SIP rejected because of the
20 emission limits related to sulfur
21 dioxide.

22 Consequently, EPA's FIP to
23 address these defects established
24 BART as Dry Flue Gas Desulfurization
25 with Dry Absorber on PSO's affected

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1 comply with BART and related Regional
2 Haze requirements. Accepting this
3 proposal for submission to EPA allows
4 PSO to plan for compliance and
5 address its long-term generation
6 needs.

7 In the original Regional Haze
8 Agreement, it was acknowledged that
9 in the event EPA rejected the SIP as
10 it ultimately did, a BART alternative
11 would result in switching one
12 coal-fired unit to natural gas.

13 Additionally, EPA has long
14 acknowledged that greater utilization
15 of natural gas is indeed a means for
16 utilities across the U.S. to meet
17 BART requirements and other
18 obligations under federal law.

19 Chesapeake Energy, one of the
20 nation's largest producers of natural
21 gas, strongly believes the resource
22 to be the most viable, economic, and
23 immediately available solution to
24 meet BART.

25 The First Amended Regional Haze

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1 units at Northeastern.
2 However, at the encouragement
3 and request of the Oklahoma Secretary
4 of Environment and the Oklahoma
5 Secretary of Energy, and others, PSO
6 initiated comprehensive discussions
7 with state officials to develop an
8 Oklahoma centric plan for known
9 federal requirements affecting
10 electric generating units.

11 In DEQ's BART Determination, it
12 was concluded that, quote, these
13 reductions will help to address local
14 formation and interstate transport of
15 ozone and reduce the contribution of
16 greenhouse gasses and mercury
17 deposition from electricity
18 generation in Oklahoma. This
19 approach provides consistency and
20 predictability to the process. The
21 technology at issue, and the overall
22 compliance plan, has been adequately
23 vetted by Oklahoma experts, other air
24 engineers, EPA, justice, and will
25 meet the objectives necessary to

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1 Agreement will, in part, result in
2 greater utilization of natural gas
3 and, consequently, will have a
4 significant positive impact on our
5 economy and our industry. Given the
6 supply and availability of natural
7 gas in Oklahoma, the use of gas-fired
8 power generation will not result in
9 significant rate increases as
10 compared to installing controls.

11 I am confident that all in
12 this room recognize the importance of
13 a strong natural gas and oil
14 industry. And in our state,
15 thankfully, Oklahoma consistently
16 ranks third after Texas and Wyoming
17 in the production of natural gas,
18 with production projected to continue
19 to increase significantly over the
20 next decade and beyond.

21 Oklahoma's Energy Plan calls
22 for a strategy that increases
23 reliance on Oklahoma resources for
24 power generation, and according to
25 the plan helps preserve Oklahoma's

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1 relative low cost of energy and
2 electricity while simultaneously
3 strengthening the economy and our air
4 quality.
5 PSO, DEQ, and other Oklahoma's
6 leaders should be commended for
7 developing an Oklahoma strategy of
8 our own, one that benefits our state
9 by meeting federal environmental
10 regulation while utilizing our own
11 natural resources. This benefits all
12 Oklahomans and our economy in the
13 immediate and long term. Chesapeake
14 fully supports the adoption of the
15 Amended Regional Haze Agreement.
16 Thank you.

17 MS. BOTCHLET-SMITH: Rick
18 Chamberlain.

19 MR. CHAMBERLAIN: Good
20 afternoon. I'm Rick Chamberlain.
21 I'm representing Calpine Corporation
22 today. As many of you know Calpine
23 Corporation is an independent power
24 producer of an 1100 megawatt
25 privately owned natural gas

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1 generating plant here in Oklahoma
2 located near Tulsa. As part of its
3 implementation of its Regional Haze
4 Settlement that is evolving in the
5 revised SIP, PSO conducted a
6 competitive bid -- bidding process.
7 It was overseen and monitored by an
8 independent evaluator and as part of
9 that process a purchase power
10 agreement was entered into with
11 Calpine Corporation. And under that,
12 EPA, Calpine will provide 260
13 megawatts of natural gas fired
14 capacity beginning in 2016 to replace
15 some of the coal generation capacity
16 that is being curtailed pursuant in
17 the settlement. Calpine supports the
18 PSO settlement; Calpine also supports
19 the revised SIP being considered
20 today. Thank you.

21 MS. BOTCHLET-SMITH: A.J.
22 Ferate.

23 MR. FERATE: Thank you very
24 much. I'm A. J. Ferate with Devon
25 Energy, and here to speak in support

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1 of the settlement for the State
2 Implementation Plan. Devon Energy
3 has been involved in and attempted to
4 assist in an effort to encourage this
5 for at least three years now.

6 Devon is a strong supporter of
7 state primacy in all issues wherever
8 it's possible. And in particular in
9 this issue because we believe that it
10 benefits the state to have State
11 Implementation with people that
12 understand the needs of the state
13 compared to a federal representative
14 trying to oversee this and possibly
15 other things as it continues on.

16 Further, Devon is, of course, a
17 producer of natural gas but believes
18 natural gas is a clean alternative to
19 some of the sources that are
20 currently in use. And in fact, the
21 International Energy Agency has cited
22 the use of natural gas as the reason
23 carbon emissions have continued to
24 fall.

25 For today's comments we have

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1 letter that we submitted to the
2 Governor of Oklahoma in support of
3 this from September of last and we
4 supply that now.

5 Thank you.

6 MS. BOTCHLET-SMITH: Mr.
7 Brandy Wreath.

8 MR. WREATH: Good afternoon.
9 I am Brandy Wreath and I am the
10 Director of the Public Utilities
11 Division at the Oklahoma Corporation
12 Commission and I am going to make it
13 clear that I am here today making
14 comments on behalf of the Public
15 Utilities Division, not on behalf of
16 our Oklahoma Corporation
17 Commissioners. We are separate in
18 that capacity.

19 I wanted to start off by
20 saying today that I stand here in a
21 different place than most of the
22 people that came up here and spoke.
23 I'm not here for the settlement; I'm
24 not here against the settlement. I'm
25 here today requesting DEQ to take a

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1 little bit more time before making a
2 final decision in this settlement
3 before making their final
4 recommendations to the EPA. And I
5 make that request today based on the
6 concept that all of the relevant
7 information that we've heard today,
8 people have said that all the
9 relevant information needs to be
10 considered. And it's our belief that
11 there is relevant information that
12 has recently changed or come to our
13 attention that's changed. And we
14 believe everybody needs the
15 opportunity to review all that
16 information to make sure that today
17 we're looking at the lowest
18 reasonable cost for the Oklahoma
19 ratepayer.

20 So, again, to us this isn't
21 about coal or natural gas. My
22 comments are totally segregated from
23 that. Our comments are about the
24 final decision that we come to is it
25 considering all relevant facts. And

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1 we believe the facts that are on the
2 table today there are additional ones
3 that need to be looked at. It may
4 have the same outcome that this
5 settlement is still the relevant best
6 choice but there may also be changes
7 that warrant minor modifications or
8 possibly major changes. And
9 unfortunately, no one can stand here
10 today and say they know the outcome
11 of that review because that has not
12 been performed.

13 So I believe that that's a
14 very important thing that needs to be
15 done. There are relevant factors as
16 you heard mentioned a little bit ago.
17 There was a purchase power agreement
18 to come out of the settlement and
19 now we understand there's additional
20 need for purchase power or additional
21 generation possibly.

22 So those are major factors that
23 we think need to be looked at.
24 We're not asking for a permanent stop
25 to this. We're not asking for it to

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1 be withdrawn. We're asking everyone
2 to just slow up a little bit, give
3 us a little bit of time. There is a
4 process that's about to begin before
5 the Corporation Commission to allow
6 them the opportunity to review the
7 integrated resource plan updates of
8 the Public Service Company of
9 Oklahoma. In that review we will
10 have the opportunity to look at what
11 has changed since the time of the
12 settlement. Our expert that we have
13 put onboard to review the EPA/DEQ
14 settlement, they will have the
15 opportunity to review the changed
16 information to see if it warrants any
17 recommended adjustments and
18 recommendations can be made at that
19 time.

20 So I will say here at the end
21 that the comments you've heard
22 before, that the Oklahoma Corporation
23 Commission will have to make the
24 determination of reasonableness.
25 What that means is they have to make

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1 the choice at the end of the day if
2 the cost of the settlement are passed
3 through to the ratepayers. I believe
4 that if we move forward at today's
5 pace that it will be unfair for them
6 to be asked to make a ruling without
7 having all the pertinent and known
8 facts in front of them. I think a
9 little bit of time would allow them
10 more comfort to review that. I know
11 that for my staff that has to make
12 recommendations to the Commissioners,
13 we would request that time. We
14 would just simply ask for the
15 innovative resource process to run
16 its normal course and then at that
17 time everybody can review if anything
18 major has changed and make final
19 recommendations.

20 So thank you again for your
21 time and we appreciate this meeting
22 today.

23 MS. BOTCHLET-SMITH: Thank
24 you. Do you have any written
25 comments for today?

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1 MR. WREATH: No.
2 MS. BOTCHLET-SMITH: Mr.
3 Jeremy Jewell.
4 MR. JEWELL: Hello. My
5 name is Jeremy Jewell. I am a
6 Principal with Trinity Consultants, a
7 worldwide environmental consulting
8 firm, and I manage Trinity's
9 operations here in Oklahoma.
10 I was responsible for
11 completing, or overseeing the
12 completion of, the technical analyses
13 that went into PSO's BART
14 reevaluation. It was these analyses
15 that, after review and approval by
16 the ODEQ, led to the proposed SIP
17 revision that presents a BART
18 determination involving the shutdown
19 of one unit, the installation of Dry
20 Sorbent Injection, or DSI, on the
21 second unit, and the incremental
22 decrease in capacity utilization
23 leading to the ultimate shutdown of
24 the second unit.
25 I would like to briefly address

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1 our execution of and results of the
2 two analyses that led to the proposed
3 BART determination:
4 First, estimating the costs of
5 the emissions control; and, second,
6 the atmospheric modeling of both
7 pre-control and post-control emission
8 scenarios to determine visibility
9 impacts in the nearby Class I areas,
10 which are the Wichita Mountains
11 National Wildlife Refuge in
12 south-west Oklahoma, the Caney Creek
13 Wilderness Area in south-get
14 Arkansas, the Upper Buffalo
15 Wilderness Area in north-central
16 Arkansas, and the Hercules Glades
17 Wilderness Area in south-central
18 Missouri.
19 First, in regards to the
20 modeling analyses, I want to point
21 out four facts.
22 The modeling methods we used to
23 evaluate the revised BART
24 determination were largely the same
25 as those relied upon in the original

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1 BART determination. For example, the
2 same CALPUFF processor was used.
3 CALPUFF is the dispersion model used
4 in the multi-step process of
5 conducting visibility modeling.
6 Also, the same meteorological dataset
7 was used. To the extent possible,
8 everything related to the modeling
9 analyses was kept consistent with the
10 previously reviewed and approved
11 analyses.
12 The primary change from the
13 original modeling methods to the
14 updated modeling methods involved the
15 use of what's called the CALPOST
16 processor. CALPOST is the processor
17 that converts the output of CALPUFF
18 into visibility values which is what
19 we use for BART determination. Since
20 the original BART determination EPA
21 developed and now requires the use of
22 a newer version of CALPOST. This
23 newer, EPA-required version was used
24 in the BART reevaluation.
25 Additionally, we used the latest EPA

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1 and Federal Land Manager guidance in
2 regards to both the CALPOST algorithm
3 or method and the background
4 concentrations for parameters such as
5 humidity that are fed into CALPOST.
6 The details of all the modeling
7 methods, all the inputs, including
8 the base-line and post control
9 emission rates that were used, and
10 all of the outputs of the model, all
11 of which were based on the latest
12 EPA regulation or guidance, were
13 provided to ODEQ in a protocol for
14 their review on or about September
15 25, 2012.
16 EPA's stated threshold for
17 attributing visibility impairment to
18 any single source of emissions is 0.5
19 delta-deciviews on a daily average 98
20 percentile basis. The results of the
21 updated modeling show that predicted
22 post-control visibility impacts are
23 less than this threshold for all
24 Class I areas of concern.
25 In regards to the cost of

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1 controls estimates, I will mention
2 three facts.
3 The original BART determination
4 and SIP were based on costs developed
5 by PSO's project engineers. In the
6 Technical Support Document published
7 with the EPA's disapproval of the
8 original SIP, EPA presented an
9 alternative cost analysis based
10 largely on its own Cost Control
11 Manual, a guidance document EPA most
12 recently published in January of
13 2002.
14 In the BART reevaluation, for
15 all cost effectiveness calculations,
16 we strictly used EPA's Control Cost
17 Manual in the same way that it was
18 used by EPA in their own Technical
19 Support Document. We also presented
20 PSO's engineering cost estimates for
21 comparative purposes. The results of
22 the control cost evaluations
23 regardless of which method was
24 employed show that the scenario
25 presented in the proposed SIP

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1 revision is the most cost effective
2 scenario that also achieves the
3 necessary visibility improvement goal
4 mentioned previously.
5 Thank you for your
6 consideration of these comments.
7 MS. BOTCHLET-SMITH: Ms.
8 Whitney Pearson.
9 MS. PEARSON: Whitney
10 Pearson on behalf of the Sierra Club
11 today.
12 The Sierra Club believes that
13 the revised SIP fully complies with
14 federal requirements (inaudible)
15 regional haze and interstate
16 pollution from the Northeastern coal
17 plants. Implementation of this SIP
18 will drastically reduce both SO2 and
19 NOx emissions by 2016 and fully
20 implement by 2026. Particulate
21 matter emissions which also
22 contribute to haze and public health
23 problems will also see a drastic
24 reduction. Clearing the haze of
25 these parks will go to protect the

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1 health of those who recreate there
2 and promote local tourism by
3 decreasing the number of days when
4 pollution impairs scenic views.
5 In 2011, over 118,000 people
6 visited the Wichita Mountains for
7 enjoyment and recreation. Compared
8 to the FIP, the SIP revision provides
9 more flexibility for PSO to comply
10 with its obligations under the Clean
11 Air Act's Haze Provisions but it does
12 not compromise public health or
13 visibility.
14 The FIP scenario may have some
15 lower impact for several years but
16 the SIP revision better achieves the
17 overall goals of the Regional Haze
18 Program because emissions from both
19 units will be completely eliminated
20 by 2026.
21 The SIP revision not only
22 permits PSO to avoid the high cost
23 of installing operating scrubbers by
24 providing for the retirement of the
25 unit -- of the unit in 2016 but also

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1 assures that PSO will avoid costs of
2 upcoming regulations that would
3 require the unit to internalize the
4 costs of its air, water, and coal
5 ash pollution and other harm to the
6 environment.
7 It is a more cost effective
8 solution that requires the
9 installation of expensive scrubbers
10 on both units. For these reasons
11 and more the Sierra Club urges the
12 DEQ to promptly approve and finalize
13 the SIP. And our full written
14 comments are available or have been
15 submitted to Ms. Bradley.
16 MS. BOTCHLET-SMITH: Thank
17 you. I need to take just a moment
18 to check the front tables and see if
19 there are any other requests for
20 comments that have been submitted.
21 Please bear with me for just a
22 moment. Okay. I don't have any
23 indication there are others that have
24 indicated that they want to comment.
25 Are there any in the audience

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1 that have decided that they want to
2 speak but -- Eddie, do you want to
3 say anything?
4 MR. TERRILL: No. I'm
5 good.
6 MS. BOTCHLET-SMITH: Okay.
7 I couldn't tell if you were raising
8 your hand. Okay.
9 We advertised the meeting to go
10 to 3:00 so we will leave the hearing
11 record open until that time, should
12 someone arrive or change their mind
13 and decide that they wish to speak.
14 You all are welcome to stay or if
15 you have somewhere else to be that's
16 fine too. But we -- DEQ will be
17 here to receive comments until 3:00.
18 (Pause)
19 MS. BOTCHLET-SMITH: Jody
20 Harlan.
21 MS. HARLAN: The Governor,
22 Office of the Attorney General,
23 Secretary of the Environment,
24 Secretary of Energy, Corporation
25 Commission staff and Oklahoma Sierra

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1 Club support American Electric
2 Power/Public Service Company's
3 compliance plan as a common sense
4 approach for complying with federal
5 regulatory safeguards and setting
6 firm dates for retirement of both
7 AEP-PSO coal units.
8 I support the proposed revision
9 of the Best Available Retrofit
10 Technology, BART, for the AEP-PSO
11 Northeastern Units 3 and 4, which
12 provide for the first coal-burning
13 unit to be phased out by April 16,
14 2016. The second unit will remain
15 in use with pollution control
16 technology installed by April 16,
17 2016. Between 2021 and 2026, AEP-PSO
18 will significantly reduce the amount
19 of coal burned at the unit until the
20 plant is decommissioned no later than
21 December 31, 2026. This option is
22 more cost effective than retrofitting
23 coal units with expensive scrubbers.
24 Continuing to run the outdated, aging
25 plants until 2041 would raise rates

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1 for residential customers by 14.3
2 compared to a projected 11 percent
3 under PSO's cost-effective plan.
4 Dangerous sulphur dioxide
5 emissions from the Northeastern power
6 plant near Oologah will be reduced by
7 more than half in 2016 and fully
8 eliminated by 2026.
9 Oklahomans' health will benefit
10 from cumulative reductions in carbon
11 dioxide, the primary cause of climate
12 disruption, and sulfur dioxide,
13 mercury, nitrogen oxides and other
14 toxins. To address the visibility
15 impairment at the Wichita Mountains
16 Class I area, under the First Amended
17 Regional Haze Agreement, AEP-PSO will
18 develop a monitoring program to test
19 operating profiles to determine if
20 sulphur dioxide can be successfully
21 removed during normal operations. In
22 the event this is not achieved, I am
23 relieved to read that sulphur dioxide
24 emissions reductions will be obtained
25 through enforceable emission limits

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1 or control equipment requirements if
2 necessary to realize the visibility
3 benefits estimated in regional haze
4 modeling.
5 Coal-fired energy generation is
6 poisoning our water and air, wrecking
7 our health and shortening lives in
8 Oklahoma. The proposed SIP revision
9 for the AEP-PSO Northeastern Units 3
10 and 4 avoids the risks of expensive
11 investments in outdated technology.
12 It allows AEP-PSO flexibility in
13 transitioning to cleaner energy
14 sources over a reasonable period of
15 time. And it enables Oklahoma to
16 comply with federal regulatory
17 safeguards while ensuring a that we
18 will have cleaner energy future.
19 (Pause)
20 MS. BOTCHLET-SMITH: This is
21 Beverly Botchlet-Smith. It is now
22 3:00 and we have not had any others
23 that want to comment so this
24 concludes are Regional Haze hearing.
25 (Proceedings concluded)

Myers Reporting

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C E R T I F I C A T E

1
2 STATE OF OKLAHOMA)
3) ss:
4 COUNTY OF OKLAHOMA)
5 I, CHRISTY A. MYERS, Certified
6 Shorthand Reporter in and for the
7 State of Oklahoma, do hereby certify
8 that the above proceeding is the
9 truth, the whole truth, and nothing
10 but the truth; that the foregoing
11 proceeding was taken down in
12 shorthand and thereafter transcribed
13 by me; that said proceeding was taken
14 on the 20th day of May, 2013, at
15 Oklahoma City, Oklahoma; and that I
16 am neither attorney for, nor relative
17 of any of said parties, nor otherwise
18 interested in said action.

19 IN WITNESS WHEREOF, I have
20 hereunto set my hand and official
21 seal on this, the 22nd day of May,
22 2013.

Christy Myers

CHRISTY A. MYERS, CSR
Certificate No. 00310

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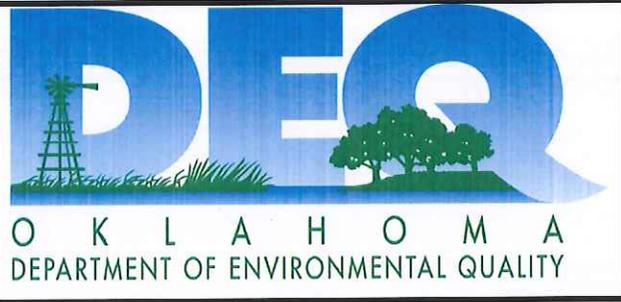
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Regional Haze SIP Hearing

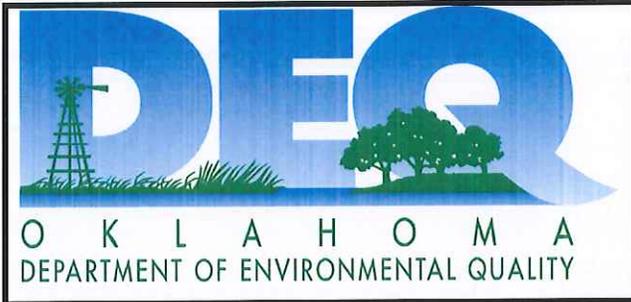
Monday, May 20, 2013

1:00 PM-3:00 PM

DEQ Multipurpose Room



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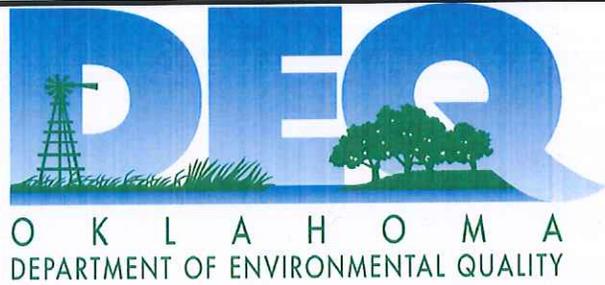
Regional Haze SIP Hearing

Monday, May 20, 2013

1:00 PM-3:00 PM

DEQ Multipurpose Room

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Regional Haze SIP Hearing

Monday, May 20, 2013

1:00 PM-3:00 PM

DEQ Multipurpose Room

<u>NAME</u>	<u>AFFILIATION</u>	<u>CONTACT INFO</u>
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STEVEN A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

June 14, 2013

Mr. Ron Curry, Regional Administrator (6RA)
U.S. Environmental Protection Agency – Region VI
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

Subject: Certification of May 20, 2013 Hearing
Regional Haze State Implementation Plan (SIP) and Interstate Transport SIP for
1997 8-Hour Ozone and 1995 PM_{2.5} NAAQS Revision

Dear Mr. Curry:

The Oklahoma Department of Environmental Quality (“DEQ”) recently conducted a public hearing concerning a proposed Revision to the Regional Haze State Implementation Plan (SIP) *Including Revisions to the Affected Portions of the Interstate Transport SIP* for the 1997 8-Hour Ozone and 1997 PM_{2.5} NAAQS. The public hearing was held on May 20, 2013 from 1:00 to 3:00 p.m. in the 1st Floor Multipurpose Room of the DEQ headquarters, 707 North Robinson Ave., Oklahoma City, Oklahoma, 73102.

On behalf of DEQ, I certify that the hearing was conducted in accordance with the information provided in the public notice and requirements of the laws and constitution of the State of Oklahoma and 40 C.F.R. § 51.102.

Sincerely,

A handwritten signature in black ink, appearing to read "Eddie Terrill".

Eddie Terrill
Division Director
Air Quality Division

ET:CB





**PROPOSED REVISION FOR
REGIONAL HAZE STATE IMPLEMENTATION PLAN
AND
INTERSTATE TRANSPORT SIP
MAY 20, 2013**

*** PLEASE COMPLETE THIS FORM IF YOU WISH TO COMMENT ***

NAME John Dirickson

AFFILIATION City of Cologatt

PLEASE NOTE: DEQ rules (OAC 252:4-5-5) provide that "The person conducting the hearing may set reasonable time limits on oral presentations, may exclude repetitive or irrelevant comments and may require that oral presentations be submitted in writing."



**PROPOSED REVISION FOR
REGIONAL HAZE STATE IMPLEMENTATION PLAN
AND
INTERSTATE TRANSPORT SIP
MAY 20, 2013**

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NAME Tom Schroedter

AFFILIATION Oklahoma Industrial Energy Consumers

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**PROPOSED REVISION FOR
REGIONAL HAZE STATE IMPLEMENTATION PLAN
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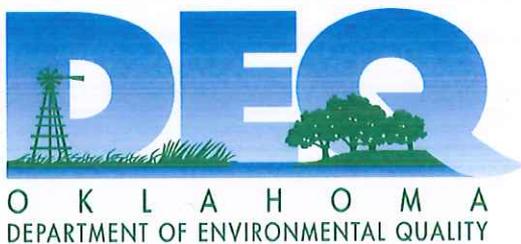
MAY 20, 2013

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NAME Bud Ground

AFFILIATION PSO

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MAY 20, 2013**

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NAME Bob Aounsavell

AFFILIATION Carie Dickson Foundation

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MAY 20, 2013**

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NAME

Jon W. Laasch

AFFILIATION

Dogwood Energy LLC

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MAY 20, 2013**

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NAME LEE PADEN

AFFILIATION QUALITY OF SERVICE COALITION

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NAME Susan Schmidt

AFFILIATION Sierra club

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NAME Jamie Maddy

AFFILIATION Chesapeake

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NAME Rick Chamberlain

AFFILIATION Calpine Corporation

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MAY 20, 2013**

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NAME A. J. FERASE

AFFILIATION DEVON ENERGY

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MAY 20, 2013**

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NAME Brandy Wreath

AFFILIATION Ok. Corporation Commission - Division ^{Public Utility}

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Requested to
be last



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INTERSTATE TRANSPORT SIP
MAY 20, 2013**

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NAME

JEREMY JEWELL

AFFILIATION

TRINITY CONSULTANTS

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NAME Whitney Pearson

AFFILIATION Sierra Club

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