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### PPL Montana Top Priorities

#### Rule suggestions

- 1) Establish a GHG rule that embraces an “all of the above” approach to generation fuel sources to ensure long-term reliability of electrical supply that is essential to the US economy at a price that does not harm electrical customers or disadvantage US business in global markets.
- 2) Establish achievable targets based on proven and commercially available technologies and allow time for development of proven commercially available technologies. Recognize all reductions occurring from a baseline period and account for the economic burden it will place on the State’s economy and consumers of electricity.
- 3) Establish source subcategories to account for a wide range of EGU technologies.
- 4) Create Section 111(d) procedures to provide consistent guidance for States and provides interpretation for States to use to determine BSER.

#### Implementation suggestions

- 1) Allow States flexibility in establishing standards. Let States determine BSER and establish standards of performance in accordance with statutory and judicial factors. (mass based, rate based, etc.)
- 2) Allow States flexibility in implementation. Allow for multiple implementation pathways to satisfy statutory goals that recognize that each State is faced with unique societal, economic and geographical conditions. (allowance/trading)
- 3) Allow flexibility in accountability measures. Accountability measures need not be standardized and can be linked with the chosen implementation pathway(s).
- 4) Establish a BSER clearinghouse to share information and ‘best practices’ about potential BSER technologies.

An overview of our positions on CAA Section 111(d) issues is contained in the attached whitepaper from the Coalition for Innovative Climate Solutions, of which PPL is a member.