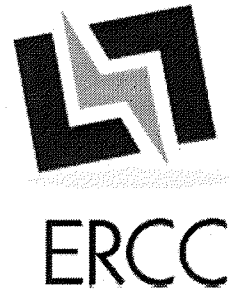


UTILITY MACT RULE

Electric Reliability Coordinating Council



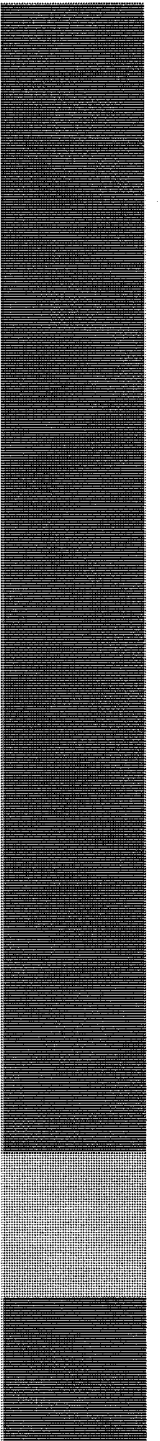
Electric
Reliability
Coordinating
Council

November 29, 2011

Meeting with Office of Information and Regulatory
Affairs,
Office of Management and Budget

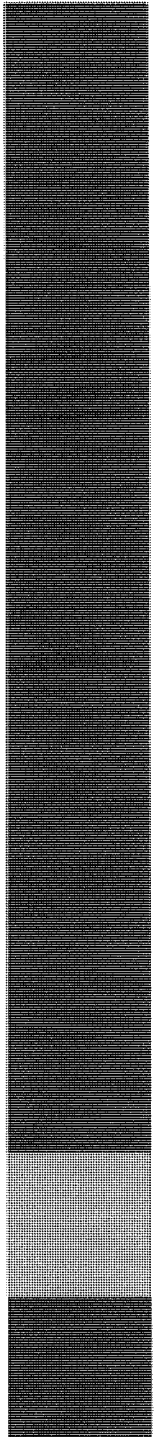
ERCC

- Background of Organization
- Participants



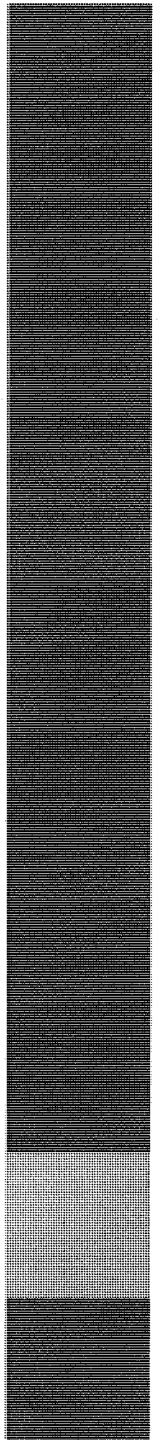
Major Issues

- Concerns with Reliability
- Benefits Analysis
- Trade-Offs
- Addressing Utility MACT Problems



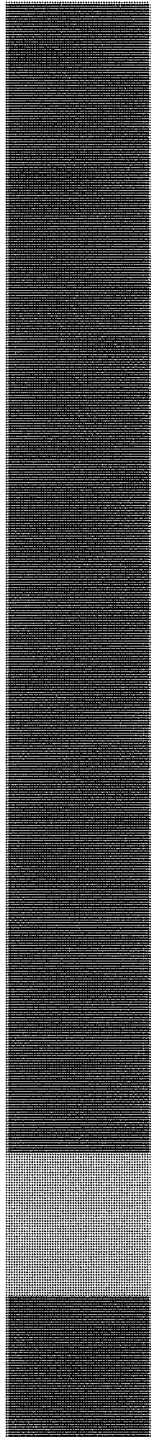
Reliability

- Need for EPA to Address Reliability
- Failure in Administrative Process
- Consensus View on Reliability
- State Views
- Grid Operators
- Contrary Views
- What's At Stake



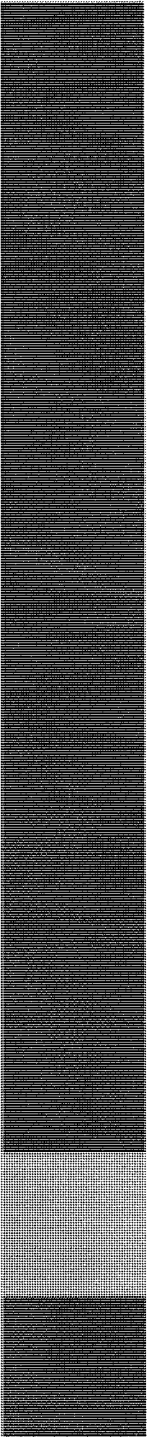
Practical Report From The Field

- The Southern Company



Benefits

- Primacy of PM Co-Benefits
- Double Counting
- Least Burdensome Alternative



Trade-Offs

- Why Trade-Offs Should Be Considered
- Macroeconomics and Public Health
- Treatment Costs
- Reliability Impacts
- Resource Allocation



Addressing The Issues

- Inadequate Time to Perfect Final Rule
- Inadequate Time to Implement the Rule
- Fixes to the Final Rule
 - Plant-Wide Averaging
 - SSM
 - Compliance Testing and Limits
 - Boiler MACT Fixes
 - Oil-Based Units
 - Non-Hg Metals
 - Sub categorization
 - Acid Gases
 - New Units
 - Hg Compliance

