

Archived: Thursday, May 31, 2012 4:00:34 PM
From: Tom Shaw
Sent: Tuesday, September 20, 2011 6:52:51 PM
To: Eric M. Robeson; Mark Bertram
Cc: Albert Yockey; Bill Blackburn; Bob Berry; Mark Hite; Lindsay Barron
Subject: RE: CSAPR trading
Importance: Normal

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Eric,

In regards to trading SO2 allowances, BREC is limited to Group I states. There are 16 states in Group I to trade with. The Group 1 states are: Kentucky, Indiana, Illinois, Tennessee, Missouri, Iowa, Maryland, Michigan, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Virginia, West Virginia, Wisconsin. That being said there is a limitation to the amount of allowances that can be used within the state. Kentucky along the other 15 states have limitations both at the facility level and the state level in regards to the amount of emissions that can leave the states boundaries. Basically, no state's emissions are allowed to exceed that specific state's budget plus the variability limit. There are other issues that may arise if the state and the facility exceed their respective variability limits and that would not be known until after reconciling emissions at the end of the year.

From: Eric M. Robeson
Sent: Monday, September 19, 2011 11:19 AM
To: Tom Shaw; Mark Bertram
Cc: Albert **Yockey**
Subject: CSAPR trading

Although initial thoughts are we should book any excess SO2 CSAPR allowances in 13 and 14 for use in 15, I am curious about trading restrictions in CSAPR.

Should we decide to trade some of our allowances, who are we allowed to trade with (other than Kentucky utilities)?