

**Archived:** Thursday, May 31, 2012 3:40:50 PM  
**From:** [Eric M. Robeson](#)  
**Sent:** Saturday, March 10, 2012 3:23:56 PM  
**To:** [Bob Berry](#)  
**Subject:** Re: Information request on EPA compliance planning  
**Importance:** Normal

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I'll take care of it

On Mar 10, 2012, at 10:25 AM, "Bob Berry" <[Bob.Berry@bigrivers.com](mailto:Bob.Berry@bigrivers.com)> wrote:

Eric, Are you going to have Tom fill this survey out or do you want one of my guys to do it? I am indifferent.

Bob

**From:** David Crockett  
**Sent:** Wednesday, March 07, 2012 3:35 PM  
**To:** Bob Berry; Eric M. Robeson  
**Subject:** FW: Information request on EPA compliance planning

Bob & Eric,

I received an email notice a few minutes ago that Big Rivers hadn't responded to the MISO survey about the impact of the EPA regulations on our generation fleet. I have no recollection or evidence of its existence prior to today. So, I am forwarding it to you since you would be able to respond better than I. I don't know why they are asking the full breadth of questions that they are posing. It would have been my supposition that MISO's intent was to determine the true reliability implications of the EPA regulations (unintended though they may be). Why they want to get involved in supply chain issues, etc. I wouldn't have a clue. To whatever degree that you choose to respond, you can copy me with our response if you want to. Other than the transmission reliability implications, I wouldn't know why it was addressed to me rather than Mark Bailey anyway.

Dave

**From:** Jameson T. Smith [<mailto:jtsmith@misoenergy.org>]  
**Sent:** Wednesday, March 07, 2012 2:53 PM  
**To:** David Crockett  
**Subject:** Information request on EPA compliance planning

*David – this email with the included attachments should have come from Clair Moeller.*

Dear Mr. Crockett:

In numerous forums, my staff and I have outlined the risks and issues facing MISO and its stakeholders in regards to the EPA rules being developed and implemented which specifically impact the electric utility sector of the economy. MISO's CEO John Bear has publicly committed that MISO would be resurveying its market participants to expand on the information sought from a 2011 fourth quarter survey. Now that the Mercury and Air Toxics Standards (**MATS**) rule is complete, we are providing you an Excel spreadsheet with questions that specifically address the mechanisms you plan on using to achieve compliance. In an effort to make the survey easy to fill out, we have pre-populated the spreadsheet with your units. If by chance we have missed one of your facilities, please add it to the list and fill in the requested information.

The survey covers the following informational categories:

1. Unit name and demographics
2. Retire or retrofit status
3. Compliance technologies being employed
4. Regulatory approvals needed and timing requirements
5. Design and procurement information
6. Construction beginning and ending dates
7. Outage information to install the needed equipment

The intent of the questions is to determine, footprint-wide, if there will be any supply

chain issues, outage issues and resource adequacy issues that will prevent compliance on the schedule laid out by EPA.

We have also included a survey tab in the spreadsheet that addresses the new Reciprocating Internal Combustion Engine (**RICE**) standards that go into effect in May 2013. MISO has a significant amount of Behind-the-Meter generation that may be impacted by the new RICE standards; and, we need to understand the implications of how much of this capacity will not be available to the markets.

I appreciate that you are busy and as such we believe the information that MISO is requesting should be readily available for inclusion in the pre-populated spreadsheet. To further help with filling out the spreadsheet, MISO will be holding a conference call whereby any clarifying questions can be raised and information sought. The date of this call will be February 10, 2012. Additional information for the call will be provided soon. In the interim, if you have any questions please contact John Lawhorn ([jlawhorn@misoenergy.org](mailto:jlawhorn@misoenergy.org)) or JT Smith ([jtsmith@misoenergy.org](mailto:jtsmith@misoenergy.org)). We are requesting the survey information back by March 1, 2012. Please provide your survey responses to JT Smith ([jtsmith@misoenergy.org](mailto:jtsmith@misoenergy.org)).

I want to thank you all for helping MISO and the region develop a thoughtful and coordinate approach this industry changing challenge.

Respectfully,

Clair J. Moeller

Vice President, Transmission Asset Management