



RICK SNYDER
GOVERNOR



JOHN D. QUACKENBUSH
CHAIRMAN

STATE OF MICHIGAN
LANSING



MICHAEL A. FINNEY
PRESIDENT AND CEO



DAN WYANT
DIRECTOR

December 19, 2014

VIA ELECTRONIC SUBMISSION AND U.S. MAIL

United States Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attention: Docket ID No. EPA-HQ-OAR-2013-0602

Dear Madam or Sir:

The State of Michigan appreciates the opportunity to comment on the United States Environmental Protection Agency's (USEPA) proposed "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Generating Units in Indian Country and United States Territories; Multi-Jurisdictional Partnerships" (Supplemental Clean Power Plan proposal), published in the *Federal Register* on November 4, 2014 (79 *Federal Register* 65482). Michigan offers the following comment regarding the treatment of renewable energy (RE) across international boundaries and its eligibility to contribute to meeting a state's emission reduction goal.

Michigan has the capability to import hydroelectric generation from Canada and believes that the final rule should reflect and acknowledge international trading of electricity, as well as allow for the purchase of RE credits from other nations such as Canada. Michigan is committed to maintaining an electric system that provides reliable and affordable energy while protecting the environment, and has already made great progress with regard to RE. While Michigan's current Renewable Portfolio Standard does not consider out-of-state hydropower as eligible, allowing international trading of low or non-emitting electricity generation to count toward meeting our state's emission reduction goal would encourage Michigan to continue to build upon progress already made in offsetting fossil fuel-fired generation with cleaner RE alternatives.

December 19, 2014

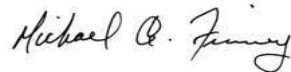
We encourage the USEPA to give thoughtful consideration to our suggestion for improvement of the final Clean Power Plan. If you have any concerns or questions, please contact Mr. G. Vinson Hellwig, Senior Policy Advisor, Michigan Department of Environmental Quality (MDEQ), at 517-284-6773 or hellwigv@michigan.gov.

Sincerely,



Dan Wyant, Director
Michigan Department of Environmental
Quality

John D. Quackenbush, Chairman
Michigan Public Service Commission



Michael A. Finney, President and CEO
Michigan Economic Development
Corporation

cc: Governor Rick Snyder
Attorney General Bill Schuette
Mr. Mike Zimmer, Director, Michigan Department of
Licensing and Regulatory Affairs
Mr. Douglas George, Consul General of Canada, Detroit
Commissioner Sally A. Talberg, Michigan Public Service Commission
Commissioner Greg R. White, Michigan Public Service Commission
Mr. Bill McBride, Governor's Washington Office
Mr. Eric Brown, Governor's Washington Office
Ms. Valerie Brader, Governor's Office
Mr. Steve Bakkal, Senior Policy Director, Michigan Economic
Development Corporation
Mr. Jim Sygo, Deputy Director, MDEQ
Ms. Madhu R. Anderson, Director of Policy, MDEQ
Mr. G. Vinson Hellwig, Senior Policy Advisor, MDEQ