



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

John E. Skvarla, III
Secretary

August 12, 2014

Docket ID No. EPA-HQ-OAR-2013-0602
U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail Code: 28221T
1200 Pennsylvania Avenue, NW.,
Washington, DC 20460

Subject: Request for Extension to Submit Comments Beyond October 16, 2014 Deadline

Dear Sir/Madame:

On June 18, 2014, the U.S. Environmental Protection Agency (EPA) proposed guidelines for reducing carbon emissions from existing power plants. Under this proposal, states are required to develop a unique plan to achieve state-specific carbon reduction targets by 2030. Our agency is working diligently to understand the rule requirements and how it would affect North Carolina's economy and the environment.

Our review to date has revealed that the rule will have a significant impact on electric power providers and rate payers. We believe the proposal creates a regulatory scheme that affects all aspects of how electricity is generated, dispatched, and used by businesses and consumers while creating a new EPA oversight of every state and local authority involved in these complex issues. EPA's current comment period deadline of October 16, 2014 simply does not provide sufficient time to understand this far-reaching and complex proposal. We are requesting an extension of 90 days to adequately review nearly 130 pages of text in the Federal Register, 380 pages of regulatory impact analysis, and numerous technical support documents and calculation routines. This includes verifying the assumptions and calculations used to establish North Carolina's CO₂ reduction goal, which, according to EPA, cannot be changed once the rule is promulgated.

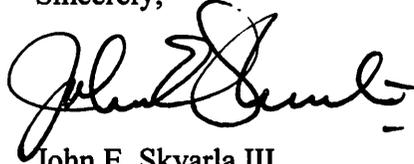
Additionally, an extension of 90 days would allow stakeholders and interested parties to develop comments that guide EPA's effort to craft a rule that is legally defensible and with lower risks and costs. Affordable and reliable electricity, along with clean air are essential to the economic well-being of our state and the quality of life of our citizens. EPA has an obligation to understand the

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impacts these regulations will have on all segments of society, and towards fulfilling this obligation, we urge you to extend the current period deadline.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Skvarla III". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

John E. Skvarla III,
Secretary, NCDENR