

GREEN BAY ELECTRICAL WORKERS

IBEW, Local #158

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**To: Robert Eckdale
Wisconsin Department of Natural Resources**

**From: Jack G. Heyer
IBEW Local 158**

Re: CAMR Comments – DRAFT

Date: May 15, 2007

The International Brotherhood of Electrical Workers (IBEW) Local 158 would like to express its concerns to proposed revisions to NR 446, Wisconsin Administrative Code, “Control of Mercury Emissions.” Pursuant to the proposed rule, Wisconsin will not participate in the USEPA national mercury emission trading program. By doing so, the WDNR is placing a heavy burden on the Wisconsin rate payer and the State’s economy.

The cap and trade model has proven to be a cost-effective method for sources to attain compliance. Trading of emission reduction credits should be included in this rule to reduce the cost of compliance for rate payers.

The WDNR has also decided to prohibit the banking of mercury allowances. Banking provisions are important to encourage early emission reductions. If WDNR is interested in encouraging early reductions, including banking provisions may facilitate early action, improve regulatory compliance through operating experience, and provide additional compliance options to reduce overall costs to the rate payer.

By not participating in the national trading system or allowing banking, the WDNR’s rule will ensure higher costs to electric rate payers in Wisconsin and discourage installation of mercury reduction technology prior to the prescribed deadlines. IUOE recommends including these provisions to reduce the financial impact to Wisconsin rate payers and the negative impact on the competitiveness of Wisconsin business. This in turn would result in loss of jobs therefore lowering the economic standards of the area.