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AIR MANAGEMENT

May 16, 2007

Mr. Robert Eckdale
Bureau of Air Management
PO Box 7921
Madison, WI 53707

Re: Support the US EPA Clean Air Mercury Rule (CAMR)

Dear Mr. Eckdale:

The Midwest Food Processors Association (MWFPA) represents large food processors with over 60 facilities in Wisconsin engaged in a variety of food processing operations. The purpose of this letter is to express support for the adoption of the US Environmental Protection Agency (EPA) Clean Air Mercury Rule (CAMR) as a means to mitigate the rate impact associated with mercury emission reductions from electric utilities. We urge the WI-DNR to adopt these standards and not create rules more stringent than EPA's.

Food processing is an energy intensive business that uses a natural gas and electricity in the manufacturing process. Energy costs contribute to the price of food products and are a factor when a processor locates a large plant. We support rules and regulations that help keep those costs down and do not put Wisconsin food processors at a disadvantage to competitors in other states and countries.

CAMR is a cost-effective regulation that continues environmental progress without hurting the economy or risking electricity reliability. We understand that most states are adopting the EPA standards and that Wisconsin is proposing a rule that deviates from CAMR in several important ways that will increase electric rates for Wisconsin ratepayers. Going beyond what other states are doing will have little impact because deposition of mercury into water is a global issue.

Increasing electric rates for Wisconsin businesses is a significant concern. The Wisconsin Public Service Commission recently conducted an analysis of industrial, commercial and residential electric rates in Wisconsin as part of its Strategic Energy Assessment. That study found that from 2000 to 2005 Wisconsin rates went from below the Midwest average to significantly above the average of our neighboring states. DNR's more stringent mercury rule will likely widen this electric rate disadvantage compared to other Midwest states.

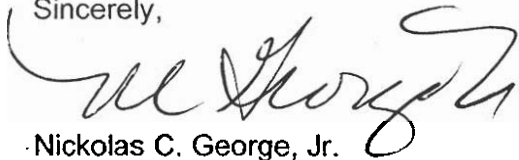
The U.S. EPA studied all options to regulate mercury emissions from power plants before concluding that CAMR's market-based cap and trade approach that achieves 70% reduction in

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mercury emissions from power plants by 2018 is the most effective approach. We urge the DNR to adopt rules that support the EPA CAMR and not put Wisconsin businesses at a disadvantage.

Thank you for the opportunity to comment on this issue. If you have any questions, I can be reached at MWFPA, PO Box 1297, Madison, WI, 53701; 608-255-9946; nick.george@mwfpa.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Nickolas C. George, Jr.", written in a cursive style.

Nickolas C. George, Jr.
President