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## **Plumbers and Steamfitters Local 400**

**Fox River Valley Wisconsin**

May 23, 2007

Robert Eckdale  
Wisconsin Department of Natural Resources

RE: CAMR

Dear Mr. Eckdale,

Plumbers and Steamfitters Local 400 of the Fox River Valley 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 the 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 prescribed deadlines. Local 400 recommends including these provisions to reduce the financial impact to Wisconsin rate payers and the negative impact on the competitiveness of Wisconsin business.

Respectfully submitted,

Mark J. Buss  
Business Manager