

# Memorandum

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**To:** Kris Krause and George Edgar, Technical Advisory Group Co-Chairs  
**CC:** Roy Thilly and Tia Nelson, Task Force Co-chairs  
**From:** Caryll Terrell and Paul Linzmeyer, Industry Work Group Co-chairs  
**Date:** 12/10/2007  
**Re:** Industry Emissions

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Earlier this fall, the Industry Work Group raised concerns about the 1990 emissions inventory that WRI had prepared for DNR and the Task Force. Specifically, the Industry Work Group was concerned about discrepancies between the WRI 1990 emissions and those of the DNR's air emissions inventory. This matter was referred to the Technical Advisory Group and several phone conversations and meetings have been held.

Our understanding is that the TAG has spent considerable time and effort to obtain and use data collected by the State of Wisconsin in developing the 2004 emissions baseline for modeling alternative policy scenarios. We also know that the TAG evaluated the WRI 2003 inventory and concluded that it was adequate for policy analysis purposes, with the exception of the Land use/Forestry/Agriculture sectors. We also note that the TAG explicitly stated that the inventory was not adequate for regulatory purposes.

We are concerned about the robustness of the 1990 emissions inventory IF the 1990 emissions level is used to drive emission reduction policies. If that is the case, we request that the TAG review and verify the 1990 emissions. However, if 1990 emission levels are not the "driving" force, then we concur that spending time and effort in verifying these emissions it is not a wise use of resources. Our position and request is that emissions be verified for whatever baseline year is used for setting the state's emission reduction targets and for any regulatory purposes.

We appreciate the TAG's work in obtaining Wisconsin specific data for the Reference Case Model. It is important that the data used to evaluate alternative policies and to evaluate their effectiveness in reducing emissions be based on data that is as accurate as possible.

cc: Industry Work Group members  
Technical Advisory Group members