Meeting with utilities re: EPA’s final Affordable Clean Energy rule  
9/26/19  
GEF2, Room G09, 1-3 pm

AGENDA

The Affordable Clean Energy (ACE) rule was finalized by EPA on July 8, 2019 and is effective as-of September 9. The rule affects 14 electrical generating units at 8 facilities in Wisconsin. The purpose of this meeting is to review the rule’s planning timelines and requirements, obtain affected utility perspectives on the final rule, and hear any questions or concerns that they may have at this time.

1:00 – 1:10 Welcome/introductions

1:10 – 1:25 Review purpose of meeting

   Brief summary of ACE rule key provisions, processes and dates (DNR)

1:25 – 2:50 Dialogue/discussion with utilities

Discussion questions:
   o What questions or clarifications are there regarding rule timelines or requirements?
   o Are the units listed on reverse the ones meeting EPA’s criteria for affected facilities?
   o Are there preferences as to how utilities would prefer DNR to engage with them on developing standards of performance for their affected units? Does this change for utilities with a multi-state presence?
   o What specific challenges do you see when it comes to this rule, especially when it comes to setting the standard of performance?
   o What else should DNR be thinking about now as it goes about developing a process to implement this rule?

Other questions or issues that utilities wish to discuss

2:50 – 3:00 Wrap up and summary of any follow-up items (DNR)
Key ACE Rule implementation dates:

<table>
<thead>
<tr>
<th>Date</th>
<th>Milestone</th>
<th>Comment</th>
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<tbody>
<tr>
<td>July 8, 2019</td>
<td>Final rule published</td>
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<tr>
<td>Sept 8, 2019</td>
<td>Rule effective</td>
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<tr>
<td>July 8, 2022</td>
<td>State plan due</td>
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<td>EPA completeness determination</td>
<td>Due NLT 6 months from state plan submittal</td>
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<td>EPA action on state plans</td>
<td>Due NLT 12 months from completeness determination</td>
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<tr>
<td>July 8, 2024</td>
<td>Compliance schedule for affected EGUs begins (assumes plan submittal on July 8, 2022)</td>
<td>Must initiate within 24 months after plan submittal</td>
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<td>EPA promulgates federal plan (if necessary)</td>
<td>2 years from finding of failure to submit state plan, or disapproval of a submitted plan</td>
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Background slides from the Air Management Study Group meeting, August 8, 2019:

ACE Rule

- ACE establishes heat rate improvement (HRI), or efficiency improvement, as the best system of emissions reduction (BSER) for CO₂ from coal-fired EGUs.

- ACE lists six HRI “candidate technologies,” as well as additional operating and maintenance practices. The six candidate technologies are:
  - Neural Network/Intelligent Sootblowers
  - Boiler Feed Pumps
  - Air Heater and Duct Leakage Control
  - Variable Frequency Drives
  - Blade Path Upgrade (Steam Turbine)
  - Redesign/Replace Economizer

ACE Rule – Affected facilities

In the final ACE rule, EPA finalized that designated facilities subject to this regulation as “any coal-fired electric utility steam generating unit that:

- is not an integrated gasification combined cycle (IGCC) unit...;
- was in operation or had commenced construction on or before January 8, 2014;
- serves a generator capable of selling greater than 25 megawatts (MW) to a utility power distribution system; and
- has a base load rating greater than 230 MMBtu/h heat input of coal fuel (either alone or in combination with any other fuel).”

Source: page 52 of pre-publication version of rule