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U.S. Environmental Protection Agency
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Submitted Electronically via Regulations.gov

**Southern Company's Response to EPA's Request for Comments on
Evaluation of Existing Regulations Pursuant to
Executive Order 13777, 82 Fed. Reg. 17,793 (Apr. 13, 2017):
Docket ID No. EPA-HQ-OA-2017-0190**

Dear Ms. Dravis:

Southern Company appreciates the opportunity to offer comments in response to the Environmental Protection Agency's ("EPA" or "Agency") April 13, 2017, Federal Register notice¹ seeking public input to assist the Agency's evaluation of existing regulations pursuant to Executive Order 13777 ("Executive Order" or "Order").² These comments are submitted on behalf of Southern Company and each of its following subsidiaries—Alabama Power, Georgia Power, Gulf Power, Mississippi Power, PowerSecure, Southern Company Gas, and Southern Power. Southern Company is also a member of the Utility Air Regulatory Group ("UARG"), Utility Solid Waste Activities Group ("USWAG"), Utility Water Act Group ("UWAG") and the Edison Electric Institute ("EEI"), and fully supports and adopts the comments submitted by those associations. Southern Company's comments supplement those filed by the above associations.

¹ 82 Fed. Reg. 17,793 (Apr. 13, 2017).

² Exec. Order 13777, 82 Fed. Reg. 12,285 (Mar. 1, 2017).

Southern Company is America's premier energy company, with 46,000 megawatts of generating capacity and 1,500 billion cubic feet of combined natural gas use and throughput volume serving 9 million electric and gas utility customers through its subsidiaries. The company provides clean, safe, reliable and affordable energy through electric utilities in four states, natural gas distribution utilities in seven states, a wholesale generation company serving customers across America, and a nationally recognized provider of customized energy solutions. Through an industry-leading commitment to innovation, Southern Company and its subsidiaries are inventing America's energy future by developing the full portfolio of energy solutions—including nuclear energy, 21st-century coal technologies, natural gas, renewable energy resources and energy efficiency—and creating new products and services for the benefit of customers. We are committed to meeting our customers' energy needs today and bringing customers energy solutions that will drive growth and prosperity tomorrow.

Southern Company believes that responsible environmental regulation is consistent with economic growth and the continued production of reliable and affordable energy. As our industry adapts to a continually changing future, Southern Company's commitment to reduce our impact on the environment is demonstrated by our environmental stewardship activities, our efforts to protect valuable natural resources while serving our customers and our compliance with applicable environmental regulations. We believe that sound government policies are essential to ensure energy is generated, transmitted, and sold in a way that is clean, safe, reliable and affordable. Further, policies designed to promote any of these goals individually should not impede the ability to optimally balance the collective goals—clean, safe, reliable and affordable. Moreover, environmental policies must consider other federal and state laws and regulation that, over time, established federal and state energy policy as it affects electric and gas utilities. Environmental regulation must effectively co-exist with

other federal and state statutory and regulatory schemes that affect the industries being regulated and respect the relevant jurisdictional roles and responsibilities under those laws and regulations. In some instances, environmental regulations adopted without this holistic approach can constrain economic growth, impose unnecessary costs on those who can least afford it, and confuse jurisdictional boundaries. Fortunately, there are ways to formulate environmental policies that continue to protect the environment while alleviating the potential for substantial economic harm to the American people—for example, adopting policies that align with technological advancement and innovation that support safe, reliable and affordable energy.

Southern Company therefore supports the policy established by the Executive Order of “alleviat[ing] unnecessary regulatory burdens placed on the American people.”³ To carry out this policy, the Order directs agencies (including EPA) to review their existing rules and identify those that may be appropriate for “repeal, replacement, or modification.”⁴ In particular, the Executive Order directs agencies to identify those existing regulations that, among other things:

- eliminate jobs or inhibit job creation;
- are outdated, unnecessary, or ineffective;
- impose costs that exceed benefits; or
- rely in whole or in part on data, information, or methods that are not publicly available or that are insufficiently transparent to meet the standard of reproducibility.⁵

As EPA undertakes its review and any subsequent actions, Southern Company’s main objective is to ensure that environmental regulations promote—rather than hinder—the generation, transmission, and sale of energy in a way that is not only clean, but also safe, reliable, and affordable. A variety of environmental regulations can be improved to achieve this balance and ensure environmental protection while also reducing the burdens imposed on the American people and the economy. As part of this

³ *Id.* § 1.

⁴ *Id.* § 3(d).

⁵ *Id.* The Executive Order also directs agencies to consider two other factors which are not addressed in these comments.

review, we encourage the Agency to consider the following fundamental principles and ensure they are reflected in subsequent actions:

- **Constructive regulation:** Regulations should provide constructive solutions to real problems affecting people, the environment, and the economy. The Agency should avoid imposing requirements that are duplicative, not supported by sound data and analysis, or otherwise unduly burdensome. In evaluating potential regulations, the Agency should take into consideration other statutes and regulations, both federal and state, that will affect the implementation and impacts of the potential regulation.
- **Regulatory certainty:** For many regulated industries, including our industry, regulatory certainty is essential to inform the long-term business planning and substantial capital investments required to effectively operate today and plan for tomorrow. Southern Company values clear, predictable requirements and consistent application of the law. Regulatory uncertainty can impose significant costs on the American people with minimal or no tangible benefits.
- **Cooperative federalism:** Regulation is most effective when the federal government works in partnership with the states rather than imposing one-size-fits-all federal regulations. This is particularly true in environmental regulation, where Congress has explicitly recognized the primary role of states.⁶ Agencies should defer to the states with regard to matters for which the states have traditionally been delegated authority.
- **Realistic assessments of costs and benefits:** Analyses of proposed or existing regulations must properly weigh the relevant costs and benefits imposed by those rules. When evaluating costs and benefits, EPA should avoid reliance on speculative or scientifically unproven benefits and use sound, commonly accepted methods to make predictions about future costs and benefits.
- **Realistic technology-based standards:** The Agency should not adopt standards based on unsupported conclusions or on unproven, unreliable, or excessively costly technologies. Requiring sources to implement technologies that are unproven or not commercially available can actually hinder further technological development.

With these principles in mind, Southern Company supports EPA's efforts to review its existing regulations pursuant to the Executive Order and offers the following comments on EPA's existing regulations. In our comments, we discuss ways in which some of EPA's existing regulations relate to

⁶ *E.g.*, Clean Air Act ("CAA") § 101(a)(3) (stating that "air pollution prevention ... and air pollution control at its source is the primary responsibility of States and local governments"); Clean Water Act ("CWA") § 101(b) ("It is the policy of the Congress to recognize, preserve, and protect the primary responsibilities and rights of States to prevent, reduce, and eliminate pollution, to plan the development and use ... of land and water resources...").

the criteria specified in the Order. These comments provide examples of rules that embody the concerns outlined in the Executive Order and are not an exhaustive list of the regulations that Southern Company believes are appropriate for review. Further examples of specific regulations that EPA should examine pursuant to the Executive Order are described in greater detail in the comments of UARG, USWAG, UWAG and EEI.

We encourage the Agency to take its next steps quickly but carefully in order to minimize the regulatory uncertainty that may result in the near term. Simple but thoughtful changes can improve rules significantly in a way that minimizes disruption to long-term business planning and ongoing construction and compliance activities.

I. EPA Should Review Regulations Establishing Impractical or Unachievable Standards, Including Standards Not Based on Sound Data and Analysis, Adequately Demonstrated Control Technologies or Not Developed in a Transparent Manner.

EPA should ensure that its regulatory requirements are: based on the use of commercially available and reliable control technologies; achievable for individual sources; and developed in a transparent manner using high-quality, publicly available data. Facility owners cannot make plans to comply with standards if they do not have the tools to do so, and the public cannot meaningfully participate in the rulemaking process if the public cannot analyze the data or the methodologies used to adopt standards.

In the 2015 **Effluent Limitations Guidelines (“ELG”) Rule**⁷ for steam electric power generating sources, shortcomings in the data EPA relied upon—much of which was not disclosed—led the Agency to adopt standards that sources cannot consistently achieve using available technology.⁸ For example, the rule’s designated “best available technology” (“BAT”) for treating scrubber

⁷ 80 Fed. Reg. 67,838 (Nov. 3, 2015).

⁸ Southern Company filed extensive comments on EPA’s proposed ELGs. *See* Comments of Southern Company on Proposed ELGs (Sept. 19, 2013), Doc. No. EPA-HQ-OW-2009-0819-4379.

wastewater continues to remain unreliable as a means to consistently achieve compliance. EPA's decisions on major portions of the ELG Rule are based on flawed data or misinterpretations of data. Because EPA did not make all of the data, methodologies, and analyses used to support its conclusions—including its BAT determination for scrubber wastewater—available to the public, the ELGs are inconsistent with the policies laid out in the Executive Order, which cautions against relying on data that are not transparent or reproducible.⁹ The ELGs should be modified to set practical and achievable standards and the public should have the opportunity to fully review the data and methodologies used to help determine the corrections that may be needed.

The **Clean Power Plan's**¹⁰ carbon dioxide (“CO₂”) emission guidelines for existing power plants are also fundamentally flawed because they are not based on emission control technologies at all.¹¹ In that rule, EPA took the unprecedented step of basing its emission reduction targets on shifting energy generation from coal-fired to gas-fired sources and from all fossil fuel-fired sources to renewable sources—rather than on emission controls that are available to the source itself. As a result, the Clean Power Plan's emission guidelines are overly stringent. This is inconsistent with the Clean Air Act (“CAA”) and four decades of EPA rulemakings under section 111 of the CAA. As EPA undertakes its review of the Clean Power Plan pursuant to Executive Order 13783, Southern Company encourages the Agency to reaffirm the longstanding principle that standards of performance must be achievable based on available control technologies at the source.

⁹ Exec. Order 13777 § 3(d)(v).

¹⁰ 80 Fed. Reg. 64,662 (Oct. 23, 2015).

¹¹ Southern Company filed extensive comments on the proposed Clean Power Plan. *See* Comments of Southern Company on Proposed Clean Power Plan (Dec. 1, 2014), Doc. No. EPA-HQ-OAR-2013-062-22907.

Furthermore, the finalized **CO₂ New Source Performance Standards (“CO₂ NSPS”)**¹² for new coal-fired electric generating units (“EGUs”) were based on carbon capture and storage (“CCS”) as the best system of emission reduction “adequately demonstrated;” however, EPA provided no evidence that CCS was completely installed and demonstrated at any commercial-scale EGU.¹³ As an industry leader in the development of CCS through implementation of pilot projects and the development of the Department of Energy-funded Kemper County Energy Facility, Southern Company is uniquely positioned to comment on the status of CCS. And, while the commercial operation of the Kemper County Energy Facility will mark a significant technological milestone for CCS, it will only be a first step in the integration of one type of carbon capture technology with a specific generation technology. Experiences gained from the Kemper County Energy Facility, as well as many more fully-integrated applications of CCS on full-scale power plants, will be needed before the technology can be considered “adequately demonstrated.” While Southern Company is optimistic that CCS may play a larger role in capturing CO₂ in the future, application of the suite of technologies required in an integrated CCS system has not yet been “adequately demonstrated” on any commercial-scale EGU, as is required before establishing a nationally applicable NSPS for new EGUs. As a result, Southern Company supports EPA’s ongoing review of the CO₂ NSPS and encourages the Agency to establish EGU performance standards based on “adequately demonstrated” control technologies.

Additionally, EPA’s recent **Cross-State Air Pollution Update Rule (“CSAPR Update Rule”)**¹⁴ that establishes revised emission budgets for power plants results in unnecessary over-control

¹² 80 Fed. Reg. 64,510 (Oct. 23, 2015).

¹³ Southern Company filed extensive comments on the proposed CO₂ NSPS. *See* Comments of Southern Company on Proposed CO₂ NSPS (May 9, 2014), Doc. No. EPA-HQ-OAR-2013-0495-10101.

¹⁴ 81 Fed. Reg. 74,504 (Oct. 26, 2016).

of upwind emissions.¹⁵ In addition to improperly imposing state emission budgets on power plants from the top down, the rule requires emission reductions from power plants in upwind states that are severely disproportionate to the limited projected reductions in downwind ozone concentrations. The vast discrepancy between required reductions and expected benefits are not sensible and are not justified by any data or analysis in the record. EPA should revise its “substantial contribution” screening methodology to conform with a common sense analysis of the data in the record. EPA should also focus its approach to addressing non-attainment issues by cooperating with states on local efforts to improve air quality and on ensuring emissions reduction requirements from upwind states actually have the potential for material, data-supported impacts on downwind ozone concentrations.

II. EPA Should Review Regulations That Are Outdated, Unnecessary, or Ineffective, Including Those That Interfere with Cooperative Federalism, Minimize State Authority, Conflict with Other Federal Statutory Schemes, Or Do Not Properly Account For Regional Differences.

Southern Company agrees that EPA should take action to address regulations that are outdated, unnecessary, or ineffective.¹⁶ In particular, regulations may be unnecessary and ineffective if they conflict with the principle of cooperative federalism, or if they impose monitoring, recordkeeping or reporting requirements that are duplicative, costly, or add little value. Congress envisioned a primary role for states in protecting the environment, and federal policies that interfere with that role can lead to inefficiencies and hinder states’ efforts to account for important regional and intrastate differences.

For example, EPA’s 2015 **Coal Combustion Residuals (“CCR”) Rule**¹⁷ fails to provide an appropriate role for state and local permitting agencies to manage coal combustion residuals.¹⁸ In the

¹⁵ Southern Company filed detailed comments on the proposed CSAPR Update Rule. *See* Comments of Southern Company on Proposed CSAPR Update Rule (Feb. 1, 2016), Doc. No. EPA-HQ-OAR-2015-0500-0290.

¹⁶ Exec. Order 13777 § 3(d)(ii).

¹⁷ 80 Fed. Reg. 21,302 (Apr. 17, 2015).

final CCR Rule, EPA removed provisions from the proposal that would have allowed for tailoring of the rule's groundwater monitoring and corrective action programs based on site-specific conditions, claiming there was no regulatory body that could oversee implementation of the rule. As a result, the final rule eliminated the proposal's cost-effective, site-specific, and environmentally protective options for managing CCRs. Instead, the final rule included overly stringent and costly compliance requirements imposed through a self-implementing compliance scheme where citizen suits were the primary enforcement mechanism. The lack of site-specific risk-based considerations, a provision that is contained in other EPA (and state) programs, is imposing tremendous costs with no additional protection of human health and the environment. However, the Water Infrastructure Improvements for the Nation Act of 2016 ("WIIN Act") passed by Congress in December 2016 expressly recognizes the critical role of states in regulating CCRs, and provides that states and EPA now have the authority to implement the CCR rule through a permit program, which can remove concerns of abuse from a self-implementing rule.¹⁹ EPA should promptly review and modify the CCR Rule to allow for implementation through cooperative federalism as contemplated by the WIIN Act.

Another example of EPA action that conflicts with cooperative federalism occurred in 2015 when EPA called for 36 states to revise their SIPs regarding emissions during startup, shutdown, and malfunction ("SSM") events. In this action, known as the **SSM SIP Call**,²⁰ EPA claimed that the SIPs of over two-thirds of U.S. states are "substantially inadequate" to meet the CAA's requirements

¹⁸ Southern Company filed extensive comments on the proposed rule in November 2010. See Comments of Southern Company on Proposed Regulations for Coal Combustion Byproducts from Electric Utilities, (November 2010), Doc. No. EPA-HQ-RCRA-2009-0640.

¹⁹ Water Infrastructure Improvements for the Nation Act, Pub. L. No. 114-322, 130 Stat. 1628 (Dec. 16, 2016).

²⁰ 80 Fed. Reg. 33,840 (June 12, 2015).

because they did not align with EPA's interpretation of how those events should be treated.²¹ This EPA action forces states to reverse their own regulations—some of which have been in place for nearly four decades—without any evidence that the SSM provisions in question would actually affect attainment or maintenance of any National Ambient Air Quality Standards (“NAAQS”). EPA should, instead, recognize the fundamental federal-state partnership that Congress envisioned in the CAA, through which states retain discretion in crafting their SIPs as long as they ensure attainment and maintenance of the NAAQS within their own borders.

Likewise, under the Clean Water Act (“CWA”), EPA hindered cooperative federalism in its **2015 Water Quality Standards Rule**.²² Water quality standards under the CWA are the states' domain, with limited oversight from EPA. The Water Quality Standards Rule improperly encroaches on the states' role by limiting their flexibility in developing their water quality standards programs and subjecting them to greater federal oversight. As a result, the rule will unnecessarily impose additional costs and regulatory delays on industry with greater administrative burdens on federal and state resources. EPA should review the Water Quality Standards Rule to seek a constructive solution that correctly maintains the principles of cooperative federalism.

The **Clean Power Plan** is also inconsistent with cooperative federalism. The CAA explicitly grants states substantial discretion to adopt state plans implementing emission guidelines for existing sources, and allows the states to vary the requirements imposed on sources based on their consideration of the “remaining useful lives of the sources” and “other factors.”²³ Yet the Clean Power Plan deprives states of that discretion by barring any variance from EPA's top-down emission reduction decrees.

²¹ Southern Company submitted extensive comments to this rule on May 13, 2013. *See* Comments of Southern Company on Proposed SSM SIP Call (May 13, 2013), Doc. No. EPA-HQ-OAR-2012-0322-0507.

²² 80 Fed. Reg. 51,019 (Aug. 21, 2015).

²³ CAA § 111(d)(2).

Moreover, the Clean Power Plan's emission reduction requirements are based on shifting states' electric generation from coal- to gas-fired sources and from fossil fuel-fired to renewable sources, rather than on emission controls available to individual sources. This ignores the primary responsibility afforded to the states to determine the appropriate mix of energy resources within their borders.

EPA regulations should also be reviewed to ensure they are consistent with other federal statutory schemes, such as the Federal Power Act or the Natural Gas Act, and with regulation under those statutes. For example, the Clean Power Plan would have the effect of requiring changes in how electric utilities dispatch their power systems, a practice that has always been subject to regulation by the Federal Energy Regulatory Commission under the Federal Power Act. The EPA must ensure that when it issues regulations, those regulations are consistent with or complementary to other federal regulations.

Regulations are also unnecessary or ineffective if they impose monitoring, recordkeeping, or reporting requirements that are duplicative, costly, or add little value. For example, Southern Company disagrees with the Clean Power Plan's requirement that power plants that capture their CO₂ in order to meet an applicable emission limit must transfer the CO₂ to an offsite facility that "reports in accordance with the requirements of 40 CFR part 98 subpart RR."²⁴ This requirement conversely prevents states from giving emissions reduction credits to plants that transfer captured CO₂ to offsite facilities that report under Subpart UU, the regime used in enhanced oil recovery ("EOR"). EOR wells are already heavily-regulated by state oil and gas boards pursuant to underground injection control programs, as well as Subpart UU. The **Subpart RR reporting requirement** for CO₂ capture projects does not further promote the safe, permanent storage of captured CO₂ and would have significant economic or compliance impacts on facilities that have invested in carbon capture and storage technologies with

²⁴ 40 C.F.R. § 60.5860(f).

plans to transfer captured CO₂ to offsite EOR operations. Requiring CO₂ recipients to report under the more stringent provisions of Subpart RR disincentivizes future deployment of CCS technologies and is unnecessary.

III. EPA Should Review Regulations That Inordinately Impact the Economy or Fail to Adequately Compare Costs and Benefits.

Agency rulemaking must account for the costs that regulation imposes on society. Regulations that are unnecessarily costly harm the American public by raising the cost of operating facilities and contributing to potential premature facility retirements or closures, which can “eliminate jobs[] or inhibit job creation.”²⁵ Likewise, constructive rulemaking requires the Agency to weigh the costs of regulation against the relevant benefits to ensure residents are made better off.²⁶

For example, the Agency’s decision to adopt the **Clean Power Plan** was based in part on a faulty cost-benefit analysis that reflected several fundamental flaws. Southern Company recognizes that climate change is a challenging issue for our world and our nation, and we are committed to a leadership role in finding solutions that make technological, environmental and economic sense. However, in the Clean Power Plan, EPA’s cost-benefit analysis attempted to justify the projected costs by pointing to the expected incidental reductions in non-greenhouse gas emissions as justification for the enormous cost of the rule. Many non-greenhouse gas emissions are already specifically and extensively regulated by other statutory and regulatory provisions under the CAA. Relying on these incidental reductions yields benefit projections for the Clean Power Plan that are either double-counted, overstated, or both. Moreover, the Agency calculated *global* benefits rather than focusing on *domestic* benefits of the CO₂ emission reductions attributed to the Clean Power Plan. Under current White

²⁵ Exec. Order 13777 § 3(d)(i).

²⁶ See *Michigan v. EPA*, 135 S. Ct. 2699 (2015); Exec. Order 13783 § 1(e), 82 Fed. Reg. 16,093 (Mar. 31, 2017) (stating “necessary and appropriate environmental regulations ... are of greater benefit than cost”).

House Office of Management and Budget (“OMB”) guidelines, analysis of economically significant proposed and final regulations from the domestic perspective is required.²⁷ Appropriate regulatory cost-benefit analyses should focus on the benefits of reducing emissions of the pollutant that a regulation is actually targeting, and only on the domestic benefits of that action. Southern Company agrees with EPA’s plan to review the Clean Power Plan in light of these issues and encourages the Agency to develop a durable and constructive solution.

EPA’s **Mercury and Air Toxics Standards (“MATS”) Rule**²⁸ is another example of a regulation that improperly counted the perceived benefits from reductions of emissions that are already regulated by other statutes. EPA’s own estimates showed the benefit from mercury and air toxics emission reductions to be \$4-6 million per year, while the cost of the rule is \$9.6 billion per year.²⁹ Moreover, the Supreme Court decided that EPA did not properly weigh the costs and benefits of this regulation. The subsequent progression of the MATS Rule also illustrates the risks of regulatory uncertainty, with changes to the rule still being contemplated over five years after it went into effect. Meanwhile, Southern Company has already invested significant capital and resources into implementing and complying with the requirements of the MATS Rule. Based on our experience complying with the MATS Rule, it is clear that numerous opportunities exist to reduce that rule’s ongoing costs: for example, by modifying or streamlining its monitoring, testing, reporting and recordkeeping provisions; by specifying that affected units are not subject to these burdensome and unnecessary requirements when they operate on natural gas; and by addressing provisions in the rule that are inconsistent or unclear. Southern Company encourages the Agency to optimize the MATS Rule’s clarity, consistency and flexibility.

²⁷ OMB, Circular A-4 at 34.

²⁸ 77 Fed. Reg. 9304 (Feb. 16, 2012).

²⁹ *Id.* at 9425, 9428.

Likewise, EPA's final ELGs for steam electric power generating sources are based on faulty cost-benefit analyses and should be reviewed pursuant to the Executive Order. In that rule, EPA concluded that the BAT for scrubber wastewater is the use of chemical precipitation plus biological treatment, despite the fact that the incremental costs of biological treatment far exceed the limited benefits of the additional pollutant removal that process would achieve. Southern Company supports EPA's ongoing review of the ELG in light of these issues.


Another example of policy that hinders economic growth is the Agency's implementation of the New Source Review ("NSR") preconstruction permitting program. The CAA requires both new power plants and existing plants that are "modified" to undergo NSR and obtain permits before construction or modification can begin. If triggered, NSR is extremely costly and time-consuming, and it presents a substantial hurdle for investment in new plants and improvements to existing plants. The theory of NSR liability that the Agency has pursued in enforcement cases against existing power plants has led to decades of litigation while yielding inconsistent judicial interpretations of the law. This inconsistency has led to compliance and enforcement uncertainty that impedes projects that could otherwise improve the reliability, efficiency and performance of these plants. Additional uncertainty surrounding costs and the availability of future generation has resulted. NSR reform can be achieved through changes in EPA's litigation position in enforcement cases, as well as through Agency guidance and regulations.

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Southern Company appreciates the opportunity to provide input on the Agency's review of existing regulations pursuant to Executive Order 13777. Southern Company believes that responsible environmental regulation need not impede economic growth or the continued production of reliable and affordable energy. We encourage EPA to take thoughtful, constructive steps to ensure that all of its

rules reflect the core principles fundamental to effective regulation: certainty and clarity; respect for the principle of cooperative federalism; meaningful consideration of both costs and benefits; and emphasis on scientifically and technically sound standards. If EPA remains mindful of these values, it can best serve the American people by optimally balancing environmental protection, safety, reliability, and affordability in the energy industry. If you have any questions regarding these comments please contact Jason Reynolds at 205.257.7181 and jakreyno@southernco.com or Scott Clouse at 205.257.6612 and sclouse@southernco.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Burleson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeffrey A. Burleson
Vice President
Environmental & System Planning

