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From: megan.berge@bakerbotts.com
Sent: Wed 4/19/2017 7:05:16 PM
Subject: EPA-HQ-OAR-2015-0500; Re-Submission of Petition for Reconsideration of the Cross-State Air Pollution Rule Update for the 2008 Ozone NAAQS
[OK Cogen CSAPR Update Petition for Reconsideration.PDF](#)
[APPENDIX A \(OK COGEN\) - ALLOCATION CALCULATIONS \(Working Courtesy Copy\).pdf](#)
[APPENDIX B \(OK COGEN\) - EIA DATA DOWNLOAD 2008-2014 \(Working Courtesy Copy\).pdf](#)

Dear Administrator Pruitt,

Attached please find a petition by Oklahoma Cogeneration, LLC ("OK Cogen") for reconsideration of the final rule entitled "*Cross-State Air Pollution Rule Update for the 2008 Ozone NAAQS*," Docket No. EPA-HQ-OAR-2015-0500, 81 Fed. Reg. 74,504 (Oct. 26, 2016). The attached petition and appendices were submitted to the prior administration on December 22, 2016, within the time period specified in the Clean Air Act.

Given that the 2017 ozone season is set to begin in May, OK Cogen must begin making decisions about purchasing allowances and taking other actions to comply with the regulation. OK Cogen's requested relief in its petition includes re-allocation of allowances to its Oklahoma Cogeneration LLC Unit CC01. OK Cogen would appreciate any clarity you can provide on EPA's intention to act on the petition.

A hard copy of the petition, along with a CD-Rom containing both PDF and Excel versions of the appendices, also is being sent to EPA via first-class USPS mail.

Respectfully,

Megan

Megan Heuberger Berge

Partner

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