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**From:** Bond, Alexander [ABond@eei.org]  
**Sent:** 10/31/2018 8:16:17 PM  
**To:** Wheeler, Andrew [wheeler.andrew@epa.gov]  
**CC:** Wehrum, Bill [Wehrum.Bill@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Jackson, Ryan [jackson.ryan@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Hutson, Nick [Hutson.Nick@epa.gov]  
**Subject:** EEI Comments on Affordable Clean Energy Rule  
**Attachments:** AffordableCleanEnergyRule\_EEIComments\_EPA-HQ-OAR-2017-0355.pdf; 111d-ACERule\_EEIComments\_Appendix A.pdf; 111d-ACERule\_EEIComments\_Appendix B.pdf

The Edison Electric Institute (EEI) appreciates the opportunity to provide the attached comments to the U.S. Environmental Protection Agency (EPA) regarding the proposed Affordable Clean Energy (ACE) rule. 83 *Fed. Reg.* 44,746 (Aug. 31, 2018). EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for about 220 million Americans and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States.

EEI's comments focus on the power sector's continued transition to cleaner sources of energy, and the necessity, both from a legal and operational perspective, that any final section 111(d) guidelines take into account the ongoing clean energy transition by providing states and sources with significant flexibility when determining compliance measures. EEI members are committed to this customer-focused transition, investing significant capital in the energy grid to make it smarter, cleaner, more dynamic, more flexible and more secure in order to integrate additional distributed energy resources and deliver a balanced mix of resources to customers.

EPA must provide states with flexibility in establishing compliance plans with any final section 111(d) guidelines in order to facilitate the clean energy transition, and should encourage states to use whatever flexibilities best address state and local technical and operational factors. If you have any questions about these comments, please contact Alex Bond ([abond@eei.org](mailto:abond@eei.org); 202-508-5523) or Eric Holdsworth ([eholdsworth@eei.org](mailto:eholdsworth@eei.org); 202-508-5103).

Thanks!

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