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January 21, 2016

U.S. Environmental Protection Agency, EPA Docket Center
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460
VIA ELECTRONIC SUBMISSION AT www.regulations.gov

Attention: Docket ID No. EPA-HQ-OAR-2015-0199

Re: EPA's Federal Plan Requirements for Greenhouse Gas Emissions from Electric Utility Generating Units Constructed on or Before January 8, 2014; Model Trading Rules; Amendments to Framework Regulations; Proposed Rule; 80 Fed. Reg. 64,966 (October 23, 2015); Docket ID No. EPA-HQ-OAR-2015-0199

Dear Administrator McCarthy:

Southern Company submits the following comments on the Environmental Protection Agency's (EPA) proposed Federal Plan Requirements for Greenhouse Gas Emissions from Electric Utility Generating Units Constructed on or Before January 8, 2014; Model Trading Rules; Amendments to Framework Regulations, noticed at 80 *Federal Register* 64,966 on October 23, 2015. These comments are submitted on behalf of Southern Company and each of its subsidiaries. Southern Company is also a member of the Utility Air Regulatory Group (UARG) and the Edison Electric Institute (EEI) and fully supports the comments submitted by UARG and EEI. Southern Company's comments supplement the comments submitted by UARG and EEI.

Southern Company is the leading energy supplier in the Southeastern United States, serving 4.5 million customers with reliable electricity service generated from a full portfolio of energy resources – nuclear, coal, natural gas, renewables and energy efficiency. Southern Company's subsidiaries include four vertically integrated electric utilities – Alabama Power, Georgia Power, Gulf Power, and Mississippi Power – as well as Southern Power, which owns generation assets and sells electricity in the wholesale market.

Southern Company appreciates the opportunity to comment on this very important proposed rulemaking. In the attached document we make detailed comments in many areas surrounding the proposed rule, including EPA's authority to implement federal plans in this circumstance, the need for further public input on the imposition of a federal plan on a particular state, the need for EPA to preserve both rate-based and mass-based federal plan options, the ability for rate-based and mass-based plans to be able to work together, and the restriction of compliance options in a federal plan over and above those able to be used in a traditional state developed plan. Southern Company believes that if EPA is forced to put itself in the shoes of a state and implement a federal plan, it should develop a state specific federal plan with consideration of cost and the remaining useful life of sources in the state and that ensures

continued reliability of electric service within the state; it should afford the citizens of that state the same public notice and comment opportunities they would get with a state developed plan; it should use either a rate-based or mass-based plan dependent on which is best for the state; and that such a federal plan should include at least the same compliance options available under a state developed plan.

Southern Company thanks you for the opportunity to submit these comments and appreciates EPA's consideration of them. If you have any questions regarding these comments please contact Thomas Wells at 205.257.6448 or twells@southernco.com or Brian Toth at 205.257.7440 or bdtoth@southernco.com at your convenience.

Sincerely,

A handwritten signature in black ink that reads "Larry S. Monroe". The signature is written in a cursive, flowing style.

Larry S. Monroe
Chief Environmental Officer
Senior Vice President
Research & Environmental Affairs