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November 19, 2014

Via E-Mail to A-and-R-Docket@epa.gov

U.S. Environmental Protection Agency
Air Docket
Mail Code 28221T
1200 Pennsylvania Ave. NW
Washington, DC 20460
Attention: EPA Air Docket EPA-HQ-OAR-2013-0602

Subject: Docket ID No. EPA-HQ-OAR-2013-0602; Comments of Sawnee Electric Membership Corporation on Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Generating Units, 79 Fed. Reg. 34830 (June 18, 2014) (Proposed Rule) & 79 Fed. Reg. 64543 (October 30, 2014) (Notice of Data Availability).

I. Introduction

Sawnee Electric Membership Corporation ("Sawnee EMC") is a Georgia Electric Membership Corporation and is a member of Oglethorpe Power Corporation ("OPC") in Tucker, Georgia. The cost impacts to Sawnee EMC are directly related to the cost impacts to OPC. Furthermore, Sawnee EMC is in total agreement with the comments filed with the EPA by OPC.

II. Discussion

Sawnee EMC sets forth the following comments relating to the EPA's Guidelines for Carbon Pollution Emission for Existing Stationary Sources as referenced in the subject of this letter; and these comments are detailed in OPC's comments:

- EPA's goal-setting methodology could result in significant stranded investments, which in turn would result in higher electricity rates for our Members.
- EPA has significantly underestimated the costs of the proposal; NERA's estimates are significantly higher.
- NERC has raised serious concerns about potential reliability risks.
- EPA has not adequately addressed the differences between large utilities and smaller utilities such as Cooperatives.

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- EPA's treatment of Georgia's "under construction" nuclear, Vogtle units 3&4, is inequitable and misguided and would almost certainly result in higher electricity rates for our Members.
- EPA's Energy Efficiency assumptions used in setting state goals are unrealistic.

III. Conclusion

Sawnee EMC appreciates the opportunity to provide EPA with comments to the proposed Clean Power Plan. Should you have any questions about these comments, please do not hesitate to contact me.

Sincerely,



Michael A. Goodroe
President and CEO