

**ES-6 Comments**  
**Recommendation 19**  
**Efficiency improvements and repowering of existing plants**

The economic impacts of any legislation must be determined and be a part of the decision.

Science and cost are not close to what the environmental groups are wanting, there is no basis for the expense that will be generated. Many scientific (Oregon Institute) and others indicate that over reaction and regulations that science can not meet but will significantly increase costs to the average consumer without and real benefit are very harmful.

Government meddling/incentives rarely result in progress. Montana should be working to remove barriers to progress not impeding them by adding bureaucracy that adds no value to the end product. Furthermore, this report was based on a politically correct directive which assumes there is a man-made climate crisis. While this assumption has the backing of the media and politicians it has little support from the scientific community. Hence the reporting by the media of the relative minority that support the theory. Technology should be able to stand on its own merits without government incentives.

When you say "encourage" does that mean provide incentives? Or is this another one of those that will mean more governmental regulation leading to additional cost to consumers?

Policies such as these will only increase energy costs to the consumer.

There should be a cost/benefit analysis required.

The benefits do not justify the costs using sound science. More taxes, regulations and red tape is not what will help Montana.

This ideas sound good, but it depends on the cost/benefit analysis.

Not very specific -- hard to know what to think of this proposal.

Ongoing permitting should be contingent upon demonstrated GHG reductions; numerical goals should be identified to provide benchmarks and credibility

Let the feds lead and the market decide. It is absurd for Montana to "take the lead." Sheesh!

Only get involved if health is threatened.

How much GHG do the coal plants in Montana contribute to nations average?

As technology and economic factors permit.

individuals can only do so much with this issue, we need strong and numerous government action of many forms and formats...

Co-firing with renewable resources would require extensive retrofits-is this feasible and do the benefits outweigh the costs (\$).

Look to the UN-intended consequences. Let the market do it's job. Like most government involvement in an issue, it is well intentioned, but will ultimately make the situation more cumbersome and expensive.

Don't understand.

Sure, improve the old polluting dogs we're stuck with.

prove that ghg is caused by humans . It has not been proven

Retrofitting is always complicated, but with all the existing plants, it has to be looked at.

Only WITH numerical goals: if they are not identified industry will only use it as an excuse to continue with the same old profit at any environmental cost.

GHG - duh??

ok, but without legislation.

We also need to look seriously at transmission losses from the electrical grid.

We are such a small part of the pie that this will just drive out existing production eliminate new production capacity leaving us dependent on sources outside our area of control. Efficiency increases are usually good unless they are mandatory and not cost effective. These increased costs would then be passed on to consumers.

develop goals.

If they are cost effective the companies should provide on their own.

You might explain GHG and MWh to the layperson.

What's "do-firing"? Should have numerical goals identified.

If funds are allocated for research and development as well as incentives to encourage the use of new technologies then this could work.

Use incentives

Not of value if it increases costs.

Not for the purpose of GHG reduction. Studies show that there is zero climate benefit to such investments.

I would like to see an unbiased cost analysis on this proposal.

Develop goals.

Let the market determine this - reduce the burdensome bureaucracy

Encourage??

Be more strict.

Another word for " policies that encourage" is Mandate...NO

set some numerical goals

Encourage do not mandate. Set goals.

Waste of time and money if the goal is to reduce GHG.

Although I support increasing efficiency at existing power plants, I want to see us move towards putting more of our resources into renewable energies and technologies.

I don't believe these government mandates are necessary at this time.

Only if these policies were not mandates.

What's the cost of these "Advance" technologies?

Again, so-called GHGs may not be significantly affecting the climate, relative to other, natural causes, so please stop these terribly premature measures!

A great jobs creator.

air quality is most important

existing powerplants sound better than new ones

Who is going to pay for all this?

GHG is a straw man. What the greens really want is a command and control economy.

This Action Plan was not a Montana grassroots Plan. It was the same plan written for California and other states. I do not support anything in this section. Montana's generators are probably using the best generation efficiency.

<http://www.righttalk.com/asx/ggws.asx>

Who will pay for this? Consumers!

Good Policies make for good business environment. Good business environment results in healthy economies for all Montanans.

This one is the scariest of all. "No numerical goals identified." that means that the regulating agency will have the right to regulate to what every level that see fit continuing to raise the bar at will. regulations are going to drive the cost of our product to the point where we will not find customers for our states biggest resource.

Coal is one of our most abundant resources. Figure out how to use it.

emphasis encourage not force

Policies that encourage reduction in GHG are more acceptable than forcing plants to upgrade. This recommendation also refers to incremental improvements, which are more palatable to some of the producers.. the incentives may be tax reductions or abatements for new equipment which do not cost existing taxpayers and government any money and future taxes.

Companies are already increasing efficiency!!! It is good business for them.

Policies that encourage reduction in GHG are more acceptable than forcing plants to upgrade. This recommendation also refers to incremental improvements, which are more palatable to some of the producers.. the incentives may be tax reductions or abatements for new equipment which do not cost existing taxpayers and government any money and future taxes.

Providing incentives is a good way to foster R&D.

I like this approach of efficiency improvements to existing facilities.

This sounds great, but what is the cost to the company? We cannot make energy generation totally unprofitable or no one will do it. We DO need to keep talking about the issues. All of us.

Review for new plants but grandfather existing plants fo reduce financial expenditure. Rate payers are going to need to pay for improvements.

This should be a national standard, not a stae or regional question

No goals identified because this is BS. Industry has moved & will move to greater efficiencies based on cost savings. Big brother does not need to legislate. The report needs to identify the home towns of the members. Are they really Montanans?

Policies are wasteful. They seldom achieve their original goals, become self perpetuating, costly programs.

**NO NEW COAL PLANTS!**

Every existing coal fired facility should be retrofitted to either gas or one of the high efficiency furnaces with maximum capture of all pollutants using the BAT.

As long as this is economical it would be good. I don't think telling companies to repower is the right thing to do unless there are economic benefits.

doesnt tell me how it's to be carried out

raise costs of production

make them pay also

This is a must. Existing power plants have to increase their levels of efficiency. This is why a cap and trade system or a carbon tax is also critical for the state.

Encourage in this language should be replaced with "regulate," "mandate," or "establish minimums toward."

the overwhelming amount of greenhouse gas generation is natural and the earth undergoes normal warming and cooling trends. It is the height of arrogance to assume that we are a significant effect and to propose destroying the economy and driving people into poverty over a manufactured false crisis. The sky is not falling.

I feel the government should spend more time, money and energy in a solution, instead of putting limitations & restrictions on power plants and industry through unattainable regulations.

A necessary regulatory improvement is to change rules to penalize industries for improvements, such as the NSR.

GHG used here for the first time. No definition is given! Finally on page 15 there is a reference to green house gas.

I am concerned that a move toward renewable resources might result in more forests being cut, which would be bad for forest health and would reduce CO<sub>2</sub> reabsorption in taking away growing plants that essentially convert CO<sub>2</sub> to oxygen.

Why if this is so good hasn't it happened already? This sounds flawed.

May have some value if business does it and not government.

Again, no goals for unproven technologies.

Could increase consumer costs and implies mandatory targets.

a no brainer, of course!

The major greenhouse gas in the atmosphere of the earth is water not CO<sub>2</sub>; this is a waste of money to make these requirements.

This recommendation will lead to increased costs to consumers and should be analyzed to determine total cost to consumers.

Must identify numerical goals!!!

Here again you have government dictating to people who own plants. They will now be required, by law, to let government control the operation of the plant they financed and built. Communism at its finest.

The State needs to stay out of Electricity generation. If they get into it, the efficiency will decrease, at least it has in other things the State has got into.

All of these are 'feel good' expensive bulls\*\*t legislation. Global warming is NOT a fact (cold records set last winter in the southern hemisphere) so it might be Northern hemisphere warming, but not global. Secondly, latest studies of the sun spots (that control global temperatures more than humans) indicate that within 20 years we will be back in a 'mini-ice age'. Not politically correct, but MUCH more accurate.

It is easy to endorse emission programs without the cost and who will pay for them.

Coal generation should continue as base load generation and modifying the emission of older plants as technology becomes available

Power plants do need updating as well as the distribution systems. No new power generation plants have gone in for over 30 years.

Fidel and Hugo Chavez would love this one.

No. Get the old plants 80% offline by 2025. Invest in wind and other renewables.

Is this an economically feasible option?

Again, we need to work towards on-site power generation for virtually every building and get away from remote power generation.

By when? Everyone knows GHG is greenhouse gasses? And MWh is Megawatt hour? Who writes this stuff?

could be a good thing? would the cost be passed on to the consumer though? We already pay a high price at it is for energy.

how?

Focus of harmful pollution like CO and NO2.

???????

Goals should be identified. Standards should be set and enforced and not with just a slight slap on the wrist and a reduction of fines !

Too technical -- don't understand it. WHO THE HECK WROTE THIS SURVEY? There are companies and writers who know how to take technical information and make it accessible to layman. You very obviously did not do this. I CONSIDER IT A SIGN OF DISRESPECT FOR THE PEOPLE YOU SUPPOSEDLY SERVE.

The GHG problem will not be solved unless emissions from existing plants is addressed.

The cost to production ratio is important. as electric prices go up incentives will naturally be there to cause utility and business to conserve energy with out bilking the tax payers of more money and giving it to big corporations.

Very important

Existing plants will be adopting plans to improve efficiency as long as the costs would not be prohibitive.

"Encourage" is good word

Excellent.

This recommendation will lead to increased costs to consumers and should be analyzed to determine total cost to consumers.

Encourage with what? No specificity, drop this.

These should policies that require GHG emission reduction, not just encourage them...you know if it's optional a lot of folks tend to choose the cheap option. In this case that's do nothing!

No worded strongly enough. We need to set specific, measureable levels.

These type of increased efficiencies should count as renewable as it is brand new energy out with no more fossil fuel in.

We all want this as long as it does not put people out of business or make the cost of energy exorbitant

how much GHG does a hydro dam produce?

Efficiency improvements are the low-hanging fruit - go for it!

As an investment in increasing output of existing infrastructure as an alternative to new coal fired plant/generator development

Need numerical goals

LIKE WHAT, WOOD ??? OR ???

Hold off on this one until goals can be identified.

GNP expects that federal legislation to regulate GHG emissions will be passed in the near future and we are developing our business plans accordingly. In the meantime, we believe it would be ill-advised for Montana to adopt GHG emissions regulations in advance of federal legislation. Any regional or Montana-specific regulations would have an infinitesimal impact on global climate change. "Early adoption" of regulations would impose significant costs on Montana businesses and consumers and would send an anti-business message to energy developers driving new projects and related investment to neighboring energy-producing states such as Wyoming and North Dakota.

need more than "encourage"

possibles, would what to see what is proposed first.

Get some knowledgeable people involved in pursuing this objective. Seems like a good idea, but easier said than done in most cases.

These retro-fits are very expensive. Are we really producing enough benefit to justify the higher cost of the electricity?

I can't see how this would work with out any specific goals and it seems it would keep inefficient plants online that might better serve the public by being decommissioned.

there is climate change. But mans impact is limited. Maybe as little as less than 3-5% need cost benefit analysis

needs numerical goals

Identify some goals.

Carbon tax then let industry (market conditions) determine the means. Just need to realize that every person in Montana will be paying the bill.

MT should look at co-generation to utilize the massive amount of thermal energy lost in conventional power generation.

Don't know what "co-firing of renewable resources" is.