

December 15, 2015

**Electronic Submission to [www.regulations.gov](http://www.regulations.gov)**

U.S. Environmental Protection Agency  
EPA Docket Center  
1200 Pennsylvania Ave. NW  
Mail Code 28221T  
Washington, D.C. 20460

**RE: DESIGN AND IMPLEMENTATION OF THE CLEAN ENERGY INCENTIVE PROGRAM;  
EPA NON-REGULATORY DOCKET: EPA-HQ-OAR-2015-0734**


The Large Public Power Counsel (LPPC) appreciates the opportunity to submit comments on the Clean Energy Incentive Program (CEIP), a program to incentivize early reductions of carbon dioxide emissions (CO<sub>2</sub>) from existing affected fossil-fueled electric generating units prior to the start of the final Clean Power Plan (CPP) program.

Notably, the U.S. Environmental Protection Agency ("EPA") has established two separate dockets for interested parties to submit comments on the design and implementation of the CEIP. One is a rulemaking docket for the proposed Federal Plan and Model Trading Rules.<sup>1</sup> The other is a non-regulatory docket for which EPA also has established to gather public input through an informal public outreach process to interested stakeholders.

LPPC has a strong interest in the establishment of an effective and workable CEIP framework to incentivize early CO<sub>2</sub> emissions reductions from existing affected generating units. However, given that the issues for which the Agency is seeking public comment in both EPA dockets are essentially the same, LPPC plans to submit to EPA one comprehensive set of comments on the proper design and implementation of the CEIP when we submit our comments on the proposed Federal Plan and Model Trading Rules on January 21, 2016.

LPPC appreciates EPA's efforts to establish a workable and effective framework for achieving early CO<sub>2</sub> reductions and looks forward to working with Agency in developing a workable and effective CEIP program.

Sincerely,



John Di Stasio, President  
Large Public Power Council

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<sup>1</sup> *Federal Plan Requirements for Greenhouse Gas Emissions from Electric Generating Units Constructed on or Before January 8, 2014; Model Trading Rules; Amendments to Framework Regulations*, 80 Fed. Reg. 64,966 (October 23, 2015).