



**Statement By  
The American Public Power Association  
In Response to The U.S. Environmental Protection Agency Utility MACT Rule  
December 21, 2011**

While we are still reviewing the rule and consulting with our members, The American Public Power Association (APPA), representing the nation's more than 2,000 not-for-profit municipal electric utilities, believes that this rule will impose additional significant costs to consumers in a short period of time.

While APPA appreciates that the Administration provided modest opportunities for additional time to comply with the rule, we are also disappointed that the rule does not appear to utilize other authorities available under the Clean Air Act that would provide additional time for compliance and lessen the cost to consumers and the potential impact on reliability.

In our comments on the rule, APPA stressed the need to take into account public power's concerns that enough time be provided for our communities to engage in the processes necessary for us to comply with the rule. This includes the time needed to plan, hold public meetings and hearings, finance, permit, construct and install pollution control devices, and coordinate and sequence the necessary regional activities.

APPA staff and our member utilities will review the details of the final rule in the coming days and may have additional reaction once that review has been completed.

###

*Based in Washington, D.C., APPA is the national service organization for the nation's more than 2,000 community- and state-owned not-for-profit electric utilities serving 46 million customers.*