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U.S. Environmental Protection Agency
EPA Docket Center
Office of Land and Emergency
Management
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Washington, D.C. 20460



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Submitted electronically via www.regulations.gov.

Re: Comments of the American Public Power Association on Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Federal CCR Permit Program; General Permit Provisions (91 Fed. Reg. at 43,051 (July 14, 2026)); Docket No. EPA-HQ-OLEM-2026-4159.

Dear Administrator Zeldin:

The American Public Power Association (APPA) appreciates the opportunity to submit the enclosed comments on the Environmental Protection Agency's (EPA or Agency) advance notice of proposed rulemaking (ANPRM) titled *Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Federal CCR Permit Program; General Permit Provisions*.

APPA is the voice of not-for-profit, community-owned utilities that power more than 2,000 communities and serve over 55 million Americans. Public power utilities are committed to providing reliable, affordable, and environmentally responsible electricity service to their customers while complying with applicable environmental requirements.

APPA appreciates EPA's efforts to address the potential regulatory gap between the self-implementing CCR regulations and the proposed permit-based compliance flexibilities as envisions in the 2026 Proposed Amendments to the 2024 Legacy/CCRMU rule.¹ As discussed in the enclosed comments, APPA makes the following recommendations:

- Codify the compliance flexibilities included in the 2026 Proposed Amendments directly in 40 C.F.R. Part 257.
- Provide prompt access to site-specific closure and compliance pathways.
- If EPA proceeds with general permits, adopt broad, performance-based eligibility.
- Use a streamlined notice of intent (NOI) process with prompt authorization and appropriate EPA oversight.
- Ensure durable coverage and clear transitions between federal and state permit programs.

¹ 91 Fed. Reg. 18,968 (April 13, 2026) (2026 Proposed Amendments).

- Minimize costs, operational disruptions, and reliability impacts for public power communities.

APPA appreciates EPA's willingness to solicit stakeholder input on a potential federal CCR general permit program. We look forward to continuing to work with the Agency to address the potential regulatory gap, provide timely access to appropriate compliance flexibilities, and ensure that any general permit program remains practical, efficient, and protective of human health and the environment.

Thank you for your consideration of these comments. If you have any questions or would like to discuss these recommendations further, please contact Julia Karo at (202) 467-2900 or email JKaro@PublicPower.org.

Sincerely,

A handwritten signature in black ink that reads "Carolyn Slaughter". The script is cursive and fluid, with the first name "Carolyn" and last name "Slaughter" clearly legible.

Carolyn Slaughter
American Public Power Association
Sr. Director, Environmental Policy

Comments of the American Public Power Association on Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Federal CCR Permit Program; General Permit Provisions (91 Fed. Reg. at 43,051 (July 14, 2026)); Docket No. EPA-HQ-OLEM-2026-4159.

The American Public Power Association (APPA) appreciates the opportunity to submit comments in response to the Environmental Protection Agency’s (EPA or Agency) advance notice of proposed rulemaking (ANPRM) titled *Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Federal CCR Permit Program; General Permit Provisions*.² The notice seeks input on whether a federal general permit could be developed to allow for affected facilities to temporarily obtain permit coverage until an individual permit issued by EPA or an approved state coal combustion residual (CCR) permit program is in effect.³ The general permit program could serve as a bridge mechanism to provide certain facilities access to the 2026 proposed alternative compliance pathways outlined in EPA’s 2026 Proposed Amendments to the 2024 CCR Legacy/CCRMU rule while awaiting a federal or state-approved individual permit.

APPA is the voice of not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. Public power utilities collectively serve over 55 million people in 49 states and five U.S. territories, and account for 15 percent of all sales of electric energy (as measured in kilowatt-hours) to end-use consumers. They are load-serving entities with the primary goal of providing the communities they serve with safe, reliable electric service at the lowest reasonable cost, consistent with good environmental stewardship. This orientation aligns the interests of the utilities with the long-term interests of the residents and businesses in their communities.

APPA appreciates the Agency’s efforts to respond to industry’s concerns regarding a “regulatory gap” that would occur between the finalization of the 2026 Proposed Amendments and compliance with the 2015 CCR Rule.⁴ A general permit(s) is a potential mechanism to address this gap and allow site-specific implementation of the CCR Rule in a timely manner. However, APPA’s preferred solution is to amend the 2015 CCR Rule and directly codify the proposed alternative compliance pathways in the underling CCR regulations. This is because inevitably not all CCR units will be eligible for general permit coverage, but all facilities should have timely access to the proposed flexibilities once finalized.

Public power utilities own and operate CCR units, hence APPA’s interest in this rulemaking. APPA has submitted comments in every major CCR rulemaking including the 2020 Proposed Permit Rule and the subsequent reopening of the comment period, the 2024 proposed Legacy CCR /CCRMU Rule, and the 2026 proposal to amend the 2024 Legacy CCR Rule.⁵

² 91 Fed. Reg. at 43,051 (July 14, 2026) (CCR General Permit ANPRM).

³ *Id.*

⁴ 80 Fed. Reg. 21,302 (Apr. 17, 2015) (2015 CCR Rule).

⁵ APPA Comments on the Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Federal CCR Permit Program Proposed Rule EPA-HQ-OLEM-2019-0361-0335; EPA-HQ-OLEM-2019-0361-0490 (Proposed Rule Reopening Comment Period); APPA Comments on the Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Legacy CCR Surface Impoundments Proposed Rule) EPA-HQ-OLEM-2020-0107-0976; and APPA Comments on the Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Legacy/CCRMU Amendments Proposed Rule EPA-HQ-OLEM-2020-0107-1647.

I. Executive Summary

APPA appreciates EPA's efforts to address the emerging regulatory gap between the self-implementing CCR regulations and the permit-based compliance flexibilities in the Agency's 2026 Proposed Amendments. While APPA supports consideration of a federal CCR general permit program as a potential regulatory tool, EPA should first pursue the more effective and durable solution: directly incorporating the proposed compliance flexibilities into the federal CCR regulations. Doing so would provide timely, nationally consistent regulatory relief without requiring utilities to wait years for federal or state permitting programs to be established, revised, approved, and implemented.

If EPA proceeds with a general permit program, it should be designed to provide practical and timely access to site-specific compliance pathways while minimizing administrative burden and regulatory uncertainty. General permits should be broadly available to appropriate categories of CCR units, rely on streamlined application procedures, avoid duplicative documentation requirements, and provide predictable permit coverage that does not create new compliance cliffs. EPA should also ensure that permitting decisions support efficient closure activities, corrective action, groundwater protection efforts, and long-term utility planning.

Public power utilities are committed to managing CCR units in a manner that protects human health and the environment while maintaining reliable and affordable electric service for the communities they serve. EPA should prioritize regulatory approaches that provide flexibility where warranted, recognize site-specific conditions, and avoid unnecessary delays that could increase costs and complicate compliance efforts. A workable general permit program may serve as an important backstop where permitting is necessary, but it should complement rather than replace broader regulatory reforms that can provide timely, industry-wide relief.

II. Background

The regulatory framework governing the disposal of CCRs has significantly evolved since EPA issued the 2015 CCR Rule under the Resource Conservation and Recovery Act (RCRA). That rule established minimum national standards for CCR disposal through a self-implementing regulatory framework, but its one-size-fits-all approach and lack of a federal permitting mechanism have created significant implementation and compliance issues. In response, Congress enacted the Water Infrastructure Improvement for the Nation (WIIN) Act in 2016, authorizing EPA to approve state CCR permit programs operating in lieu of the federal rule and directing EPA to establish a federal permit program for CCR units in Indian country and non-participating states.⁶

In 2020 EPA proposed a federal CCR permitting program to supplement the self-implementing regulations with a permit-based system modeled on existing permitting programs under the Clean Water Act, RCRA Subtitle C, the Safe Drinking Water Act, and the Clean Air Act. The proposal included three permit types: individual permits, general permits, and permits by rule, to accommodate different CCR unit types and site conditions. Since then, EPA has significantly expanded the scope of CCR regulation through the 2024 Legacy CCR/CCRMU Rule and its subsequent 2026 Proposed Amendments which would create new compliance flexibilities, revise certain regulatory requirements, and provide site-specific pathways for compliance. However,

⁶ Public Law 114-322.

because these flexibilities would only be available through a permit, regulated entities would not be able to access them until a federal permit program is established or state programs are established or revised and reapproved, a process which EPA says could take years. In the interim, facilities would remain subject to the inflexible, one-size-fits-all regulatory requirements. Industry stakeholders urged EPA to address this potential regulatory gap by establishing a workable bridge mechanism to ensure the proposed flexibilities would be available to facilities while awaiting permit coverage.

In response to concerns about the regulatory gap between the self-implementing program and the federal permit regime, EPA is now issuing an ANPRM seeking comments on the potential development of one or more general permits that could provide a temporary pathway for facilities to obtain permit coverage pending issuance of a federal or state-approved individual permit. Specifically, EPA requests input on eligibility criteria, permit terms and conditions, the duration of permit coverage, opportunities for public participation, and whether EPA should make an affirmative determination that permit coverage is appropriate before authorizing a facility under a general permit.

III. Comments on a General Permit Program

APPA incorporates its comments on the 2020 Federal CCR Permit Proposal and offers the following recommendations.⁷ The threshold issue is not simply how EPA should structure a general permit, but how the Agency can ensure that facilities receive the proposed compliance flexibilities when they are needed. The most effective solution is to incorporate those flexibilities directly into the self-implementing CCR regulations. If EPA nevertheless proceeds with a general permit program, it must function as a timely and reliable complement—not a substitute—for that broader regulatory reform.

A. EPA Should Address the Regulatory Gap Through the Self-Implementing CCR Regulations

APPA continues to believe that the best long-term solution is for EPA to incorporate the proposed flexibilities directly into the self-implementing CCR regulations. A permitting-only approach would delay access to critical regulatory relief and produce inconsistent results across states. As the Agency acknowledges, facilities could wait years while EPA finalizes the provisions, states revise their programs, EPA approves those revisions and permitting authorities issue permits. Facilities in states without approved CCR programs could face even longer delays while EPA develops and implements a federal permitting program. Even the development and implementation of general permit provisions could take years, as EPA would still need to propose and finalize a rulemaking before any CCR general permit could be issued.

That delay is not merely procedural; it would undermine the very relief EPA intends the 2026 Proposed Amendments to provide. Many CCR units are already advancing through closure, corrective action, and groundwater compliance under existing deadlines. Even a one- or two-year delay could disrupt closure sequencing, increase costs, and force facilities to make irreversible decisions under requirements EPA has already concluded warrant site-specific flexibility. The Agency therefore should not condition meaningful relief on a permitting process that may deliver it

⁷ APPA Comments on the Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Federal CCR Permit Program Proposed Rule EPA-HQ-OLEM-2019-0361-0335 (85 Fed. Reg. 9,940, February 20, 2020) and 91 Fed. Reg. 31,684 (May 28, 2026) EPA-HQ-OLEM-2019-0361-0490 (Proposed Rule Reopening Comment Period).

too late to be useful.

1. EPA Should Codify the Proposed Flexibilities in Part 257

APPA urges the Agency to incorporate the proposed permit-based compliance flexibilities directly into the self-implementing CCR regulations. RCRA provides EPA with the authority to revise the national criteria governing CCR disposal and although RCRA § 4005(d) authorizes federal and approved state permit programs to establish site-specific requirements, it does not prohibit EPA from incorporating protective flexibilities into the federal regulations themselves. The permitting provisions supplement EPA's existing authority to revise the national criteria; they do not have to serve as the exclusive mechanism for providing regulatory flexibility. EPA can incorporate these flexibilities into the self-implementing rule while continuing to satisfy RCRA's requirement that CCR disposal presents no reasonable probability of adverse effects on human health or the environment. The Agency could establish objective eligibility criteria, require technical demonstrations, professional engineer certifications, recordkeeping, and public disclosure requirements similar to those already used throughout the CCR program. This approach would provide prompt and nationally consistent relief while maintaining appropriate environmental protection.

Codifying the flexibilities directly in 40 C.F.R. Part 257 would also avoid the regulatory gap that EPA itself has recognized. Facilities should not be forced to make costly or irreversible compliance decisions under a framework that EPA has determined warrants site-specific consideration. Direct incorporation of the proposed flexibilities would ensure that regulated entities can benefit from the Agency's intended relief, rather than years later when permitting programs are finally developed and implemented.

2. EPA Should Provide Relief for Units Already Undergoing Closure

Amending the self-implementing regulations to incorporate alternative regulatory standards is particularly important for closures. The potential regulatory gap is most concerning for owners/operators currently undertaking closure activities that cannot be delayed given the inflexible timeframes for completing closure. Therefore, EPA should allow owners and operators of units currently undergoing closure to use alternative closure approaches, notwithstanding 40 C.F.R. § 257.102(d)(1) and (d)(2), provided they satisfy protective criteria. EPA could require the owner or operator to demonstrate that the closure approach will minimize the need for future maintenance and controls and, to the extent feasible and necessary, minimize or eliminate post-closure releases of CCR, leachate, or contaminated runoff. EPA should also allow saturated ash to remain in place where the owner or operator demonstrates, based on site-specific conditions, that hydraulic conditions will not: (1) compromise the stability of the final cover system; (2) interfere with corrective action under 40 C.F.R. § 257.98; or (3) pose a risk to off-site drinking water receptors. The record demonstrates that the presence of limited free liquids does not, by itself, create a reasonable probability of adverse post-closure effects. Thus, complete elimination of free liquids is not necessary to achieve protective post-closure performance.

EPA has ample ability to ensure alternative closure approaches are implemented protectively. The Agency could establish clear eligibility standards. Such safeguards would provide a practical pathway for facilities currently facing closure deadlines while preserving EPA's ability to evaluate site-specific conditions through future permitting programs. Without such relief, units already in closure may be forced to continue under existing requirements and forgo more

site-specific and equally protective approaches that EPA has determined are appropriate.

B. A General Permit Should Complement, Not Replace, Broader Regulatory Reform

If EPA declines to codify the proposed flexibilities directly, it must ensure that the general permit program does not perpetuate the same delay and uncertainty. A CCR general permit could provide a bridge between finalization of the 2026 Proposed Amendments and issuance of federal or approved-state permits—but only if coverage is timely, durable, and administratively workable. Because the ANPRM does not define the application, review, authorization, or transition procedures, APPA cannot yet determine whether the contemplated program would meet that standard. EPA should therefore propose the complete permitting framework and provide stakeholders a meaningful opportunity to evaluate whether it will deliver relief in practice.

1. *EPA Should Make General Permit Coverage Available Without Delay*

EPA should establish a general permit mechanism that provides timely coverage for eligible CCR units. Because EPA must first propose and finalize federal permit provisions, APPA urges the Agency to expedite finalization of the 2026 Proposed Amendments and, if it pursues this approach, promptly complete the general permit rulemaking. This would maximize the value of the proposed site-specific flexibilities. EPA should also evaluate alternative ways to close the regulatory gap, as a general permit alone may not provide timely relief for all eligible units.

2. *General Permit Coverage Should Be Durable and Predictable*

The ANPRM suggests that EPA intends for general permit coverage to be temporary and provide access to permit-based site-specific flexibilities until a federal individual or state-approved permit is available.⁸ APPA first seeks clarity on how EPA intends for general permits to work within the federal permitting program framework. The federal permitting program framework describes general permits as one of three proposed permit types that utilities could obtain to access permit-based flexibilities and operate in-lieu of the self-implementing regulations. APPA interprets this to mean that a facility can obtain coverage under a general permit and generally not have to transition to an individual permit once they are available. In this case general permit coverage would not be temporary, unless perhaps the facility is in a state that pursues and is approved for a state CCR program.

In addition, EPA should clarify if and how a general permit program would apply to facilities in states that are awaiting state CCR program approval. Applicability clarification should be given to both states pending initial program approval and approved states which have not yet incorporated site-specific flexibilities. If general permit coverage could apply to facilities within these states, EPA should provide a clear transition process between federal and state permit coverage.

EPA should not impose a fixed expiration date that creates a new compliance cliff unrelated to the facility's conduct, compliance status, or environmental performance. Rigid expiration dates could leave facilities without permit coverage due to Agency processing delays. Just because a state program obtains EPA approval, doesn't mean facilities would immediately receive coverage under a state permit. General permit coverage should remain effective until an approved state issues a permit or EPA determines that the facility is no longer eligible or is not complying with applicable permit conditions.

⁸ 91 Fed. Reg. at 43,052.

APPA recommends that EPA does not treat general permits as an interim permitting mechanism. If a facility obtains coverage under a general permit, they should be able to rely on that permit. The potential for changing permit conditions would prevent stability and reliability, which would inherently increase costs associated with CCR unit management, particularly if paired with a closure.

3. *Eligibility Criteria Should Be Broad and Performance-Based*

General permits can provide an efficient and effective permitting approach for defined categories of similarly situated CCR units, while allowing EPA to reserve individual permits for facilities with complex or extraordinary conditions. However, EPA should not define eligibility for general permit coverage too narrowly. Coverage should be available to categories of CCR units with substantially similar compliance needs that pose low to no risk of adverse impacts on the environment and human health. Eligibility criteria should focus on whether a unit can meet protective performance standards, rather than arbitrary limits such as unit size, age, location, or stage of closure.

The ANPRM identifies potential eligibility categories, including surface impoundments closing with waste in place and units using pump-and-treat systems for corrective action.⁹ APPA recommends that eligibility include, at a minimum, units in closure; units closed under an approved state solid waste program; coal combustion residual management units (CCRMUs), if EPA retains the CCRMU provisions; units that do not pose a risk to drinking water sources; and units implementing corrective action through pump-and-treat systems.

These categories are appropriate for general permit coverage because they involve established regulatory requirements, predictable compliance obligations, or lower-risk conditions that can be addressed through standardized permit terms such as monitoring and corrective action. Units in closure and those using pump-and-treat corrective action follow well-understood approaches, while units closed under approved state programs have already undergone regulatory review and oversight.

CCRMUs, if retained, and units that do not threaten drinking water sources should qualify for general permit coverage. For CCRMUs, permits should allow performance-based management where site-specific data shows that monitoring, controls, and corrective action adequately protect human health and the environment. EPA should not require removal or closure when these measures provide equivalent protection.

4. *General Permits Should Provide Access to Site-Specific Compliance Pathways*

The primary value of a general permit program is timely access to EPA's proposed site-specific compliance pathways. Eligible facilities should be able to use technical demonstrations to support alternative approaches that are at least as protective as the applicable self-implementing CCR requirements.

Permit authorities should be able to consider site-specific conditions affecting groundwater monitoring, corrective action, cleanup levels, closure requirements, and closure sequencing. Eligible facilities could submit a technical study supporting an alternative compliance pathway for the permitting authority's review.

⁹ 91 Fed. Reg. at 43,053.

EPA could model this approach on National Pollutant Discharge Elimination System (NPDES) general permits, which allow permittees to submit demonstrations, seek waivers, justify alternative monitoring, request no-exposure certifications, or obtain approval for equivalent controls. A CCR general permit should include similar mechanisms, supported by standardized templates or guidance for technical demonstrations showing that requested site-specific flexibilities satisfy eligibility criteria and provide equivalent protection.

5. *General Permit Procedures and Conditions Should Be Simple and Standardized*

To translate broad eligibility into timely coverage, EPA must pair it with a simple, standardized permit structure. A single general permit with category-specific modules would be faster to administer and easier for regulated entities to use than multiple separate permits, while reducing the risk of inconsistent requirements. The permit's value will ultimately depend not only on who is eligible, but also on whether the process allows qualified facilities to obtain and rely on coverage without unnecessary delay.

The general permit structure could model the NPDES multisector general permit (MSGP) program. Similar to the MSGP, EPA could issue a single CCR general permit with sector-like modules and associated conditions for specific compliance scenarios. Facilities could obtain coverage under a pre-established set of requirements or request equally protective site-specific flexibilities if they meet eligibility criteria.

EPA should establish general permit conditions that are clear, objective, standardized, and limited to what is necessary to ensure compliance with applicable CCR requirements. General permits should not impose duplicative obligations beyond 40 C.F.R. Part 257, subpart D, or reopen issues already addressed through existing demonstrations, operating records, groundwater monitoring data, corrective action materials, or closure plans.

EPA should allow facilities to rely on existing CCR documentation for permit applications and/or technical demonstrations to support an alternative compliance pathway; including closure plans, groundwater monitoring data, corrective action materials, engineering certifications, public website postings, and operating record information to the extent feasible.

6. *Application Requirements Should Be Limited to Information Needed to Confirm Eligibility*

EPA should establish a streamlined notice-of-intent (NOI) process for general permit coverage. The NOI should be limited to information necessary to confirm eligibility, including the facility and CCR unit, the category of general permit coverage requested, the applicable compliance pathway, existing documents supporting eligibility, any site-specific technical demonstration, relevant operating record or public website links, and a certification that the facility meets the general permit eligibility criteria.

7. *EPA Should Not Require Case-by-Case Public Comment on Every Coverage Request*

Public notice and comment should occur when EPA develops and issues the general permit

itself, not for every individual facility seeking coverage under the general permit. Requiring case-by-case public comment on each request for coverage would undermine the efficiency and purpose of a general permit and could create delays similar to those associated with individual permits. EPA should make NOIs publicly available and retain authority to request additional information where warranted.

8. *EPA Should Allow Prompt Authorization Once Eligibility Is Demonstrated*

EPA should establish a clear and time-bound authorization process for general permit coverage. Coverage could become effective after submission of a complete NOI unless EPA objects within 30 days. If EPA objects to coverage, the Agency should identify the specific deficiency, explain what information is needed, and allow the facility to correct the deficiency without restarting the entire process unless the NOI is materially incomplete or inaccurate.

Furthermore, EPA should not make an affirmative determination of eligibility before coverage becomes effective. Again, this would replicate many of the procedural burdens and delays associated with individual permits. APPA members have already experienced significant delays under comparable pre-authorization review processes for CCR Part A and Part B applications. An NOI-based authorization process would better balance timely permit coverage with EPA oversight and preserve the efficiencies that a general permit program is intended to provide.

C. EPA Should Account for Economic, Operational, and Reliability Impacts

The need for a workable permitting process is reinforced by the real-world consequences of delay. CCR permitting decisions directly affect utility operations, capital planning, generation availability, closure sequencing, beneficial use, and customer costs. For not-for-profit public power utilities, these consequences do not remain on a corporate balance sheet; they are ultimately borne by the communities the utilities serve.

A well-designed general permit program is therefore essential to help utilities coordinate closure, corrective action, and groundwater monitoring efficiently, avoid operational disruptions, and direct limited resources toward environmental compliance rather than unnecessary administrative costs.

EPA should not allow permitting delays to drive up engineering, construction, and contractor costs; impede closure, corrective action, and beneficial use; or undermine capital and generation planning. To protect public power communities from avoidable costs, EPA should establish a timely, predictable, and workable pathway to permit coverage.

IV. Conclusion

Taken together, these considerations support a clear course of action. EPA should first amend the 2015 CCR Rule to codify the proposed flexibilities, particularly those addressing closure, so that protective site-specific approaches are available when facilities need them. Direct codification would provide the greatest regulatory certainty, avoid preventable delays, and promote consistent implementation nationwide.

However, if EPA determines that a permitting mechanism is necessary to implement compliance flexibilities, APPA continues to support state CCR permit programs as the preferred permitting framework and encourages EPA to continue approving qualified state programs as expeditiously as

possible. Nevertheless, the reality is that some states may not pursue program approval, and EPA must provide a federal pathway for facilities to access the proposed flexibilities. In those circumstances, a general permit program could serve as an important backstop by providing a streamlined and efficient permitting option for similarly situated CCR units.

Should EPA move forward with a general permit approach, it should avoid narrow eligibility criteria, extensive permit applications, case-by-case public comment on every coverage request, open-ended EPA review periods, rigid expiration dates, duplicative documentation requirements, conflicting federal and state obligations, and permit conditions that reopen settled technical determinations without cause.

We look forward to EPA finalizing the proposed flexibilities as soon as practicable and selecting an approach to fully address the potential regulatory gap. If you have questions regarding these comments, please contact Julia Karo at (202) 467-2900 or email JKaro@PublicPower.org.