



Search

Advanced Search

New Dockets

Docket Search

Daily Search

Request List

Logon

Help

Help - Accessible

Login: Guest

[E-mail this page](#)

File List

Accession Number: 20171016-5082

Description: Comment of FirstEnergy Corp. under RM18-1. (Erroneously Filed)

Type	File Name	Size
Microsoft Word	<input type="checkbox"/> UNITED WAY OF JEFFERSON COUNTY comments to FERC.DOCX No description given	26748
FERC Generated PDF	<input type="checkbox"/> 12506614.PDF	17406

[Doc Info](#) [Add to Request](#) [DownLoad](#) [Reset](#) [Help](#)

You don't have permission to access this document.
This document (eLibrary accession no. **20171017-5082**) is Privileged.
The public may file a FOIA request under 18 C.F.R. 388.108.

October 16, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

**COMMENTS OF THE UNITED WAY OF JEFFERSON COUNTY IN SUPPORT
OF THE PROPOSED RESILIENCY RULE**

On September 28, 2017, the Department of Energy (“DOE”) issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to “ensure that certain reliability and resiliency attributes of electric generation sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations in **Ohio** will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will thus sustain the long-term viability of critical power plants, preserve and create jobs, maintain electric reliability, and provide substantial economic benefits to the many hard-working Americans living throughout the region.

The UNITED WAY OF JEFFERSON COUNTY strongly supports the Proposal and shares the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and the loss of critical economic and reliability benefits. Without these critical units, UNITED WAY OF JEFFERSON COUNTY will be challenged to support the health, education and financial stability of our community. There is

no time for delay. In addition to acting promptly, FERC should also direct organized market operators to issue a comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical power plants. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

KATE SEDGMER
EXECUTIVE DIRECTOR
UNITED WAY OF JEFFERSON COUNTY
PO BOX 1463, 511 N. FOURTH ST. STEUBENVILLE, OH 43907
740-284-9000
KATESEDGMER@UNITEDWAY-JC.ORG

II. DESCRIPTION OF UNITED WAY OF JEFFERSON COUNTY

[Insert generic description of organization]

III. DESCRIPTION OF UNITED WAY OF JEFFERSON COUNTY INTEREST IN PROCEEDING

The **UNITED WAY OF JEFFERSON COUNTY** is a non-profit entity located in Ohio. Our organization advances the health, education and financial stability of every person in our community. The continued operation of the baseload coal and nuclear power plants translates into safer and more prosperous communities. Thus, the **UNITED WAY OF JEFFERSON COUNTY** members have a direct and substantial interest in this proceeding. As well, the unique perspective of the **UNITED WAY OF JEFFERSON COUNTY** and its members will only serve to enhance the record in this proceeding.

IV. COMMENTS

The communities where struggling baseload coal and nuclear power plants are located are dependent on the jobs and economic development opportunities the power plants provide. The recent decline in Ohio electric power industry, for example, has led to reductions in operations at numerous power production and manufacturing facilities across Ohio. This continued decline will impact **UNITED WAY OF JEFFERSON COUNTY** ability to bring positive impacts to the 60,000 residents in the region, including support for the health, education and financial stability of our communities.

Baseload coal and nuclear plants in **Ohio** provide economic opportunities to our community. **If possible, please describe economic impact of the plants in state or region: For example, First Energy contributes over \$15,000 each year to our organization that supports services provided to our communities, including sexual assault and domestic violence services, health and mental health services, drug and alcohol presentation for youth and adults, and food to over 1,000 families every month.** The loss of jobs, tax revenue, and the ripple effect of such losses throughout the local economy, will have a severely detrimental impact on the region.

The issuance of a rule preserving the continued operation of resilient baseload coal and nuclear power plants will maintain a reliable supply of electricity for the region's energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation. Preserving baseload coal and nuclear power plants will keep these needed, reliable facilities running close to home without the need to depend on distant resources,

particularly during catastrophic events like severe storms, to fulfill our region's dynamic need for reliable electricity.

Second, premature plant closures will deplete the stable of highly skilled (and specifically trained and experienced) employees, many of whom have lived in the region for several years and who take great pride in their work. With a depletion of this skilled and experienced group of workers, and the possible replacement of these workers with more distant and perhaps less-skilled individuals, we will see a direct and adverse impact on our ability to provide services to our community. Because of the loss of jobs, the significant reduction in payments to local governments, and the decline in electricity resource and grid reliability that would result from deactivation of the nuclear and coal-fired generating facilities in Ohio, it is essential that the FERC adopt a rule, such as that proposed by DOE, which will ensure that such generating facilities are fully compensated for their costs and will remain in operation.

In order to mitigate the risk that such generating units may be deactivated prematurely, the **UNITED WAY OF JEFFERSON COUNTY** strongly urges FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further bolstered by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security, attendant to the premature closure of crucial power plants. Any protracted delay in creating fully compensatory market rules will only exacerbate the problem of pre-mature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but

comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,

KATE SEDGMER
EXECUTIVE DIRECTOR
UNITED WAY OF JEFFERSON COUNTY

Document Content(s)

UNITED WAY OF JEFFERSON COUNTY comments to FERC.DOCX.....1-5



[Search](#)

[Advanced Search](#)

[New Dockets](#)

[Docket Search](#)

[Daily Search](#)

[Request List](#)

[Logon](#)

[Help](#)

[Help - Accessible](#)

[Login: Guest](#)

[E-mail this page](#)

File List

Accession Number: 20171017-5058

Description: Comment of United Way of Beaver County under RM18-1.

Type	File Name	Size
PDF	<input type="checkbox"/> United Way of Beaver County Comments.PDF No description given	78314
FERC Generated PDF	<input type="checkbox"/> 12507342.PDF	81688

October 16, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

**COMMENTS OF THE UNITED WAY OF BEAVER COUNTY IN SUPPORT OF
THE PROPOSED RESILIENCY RULE**

On September 28, 2017, the Department of Energy (“DOE”) issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to “ensure that certain reliability and resiliency attributes of electric generation sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations in Beaver County, Pennsylvania will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will thus sustain the long-term viability of critical power plants, preserve and create jobs, maintain electric reliability, and provide substantial economic benefits to the many hard-working Americans living throughout the region.

The **United Way of Beaver County** (“UW of BC”) strongly supports the Proposal and shares the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and the loss of critical economic and reliability benefits. Without these critical units, the UW of BC will be challenged to support the health, education and financial stability of our community. There is no time for delay. In addition to

acting promptly, FERC should also direct organized market operators to issue a comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical power plants. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Michael J. Rubino
Executive Director
United Way of Beaver County
3582 Brodhead Rd – Suite 205, Monaca PA 15061
724-774-3210
rubino@unitedwaybeaver.org

II. DESCRIPTION OF UNITED WAY OF BEAVER COUNTY

Local area non-profit organization dedicated to working with the business, professional and residential community to raise and distribute funds to human service agencies to help those less fortunate in Beaver County PA.

III. DESCRIPTION OF THE UNITED WAY OF BEAVER COUNTY'S INTEREST IN PROCEEDING

The United Way of Beaver County is a non-profit entity located in the western PA county of Beaver. Our organization advances the health, education and financial stability of every person in our community. The continued operation of the baseload coal and nuclear power plants translates into safer and more prosperous communities. Thus, the clients of the UW of BC have a direct and substantial interest in this proceeding. As well, the unique perspective of the UW of BC and its members will only serve to enhance the record in this proceeding.

IV. COMMENTS

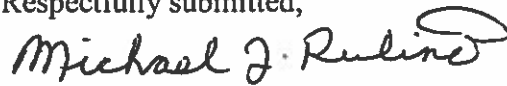
The communities where struggling baseload coal and nuclear power plants are located are dependent on the jobs, charity and economic development opportunities the power plants provide. The recent decline in W. Pennsylvania's electric power industry, for example, has led to reductions in operations at numerous power production and manufacturing facilities across the tri-state area. This continued decline will impact the United Way of Beaver County's ability to bring positive impacts to Beaver County residents in the region, including support for the health, education and financial stability of our communities.

Baseload coal and nuclear plants in W. PA provide economic opportunities to our community. **The employees and corporate donations of the First Energy Nuclear Power Plant and the Bruce Mansfield Coal Generation Plant make up almost 15% of the annual donations of the United Way of Beaver County. In dollars that is approximately \$120,000 annually to help provide aid to thousands of people in Beaver County PA. These plants also provide help with food drives and "day of Caring" volunteers that could not be replaced easily.** The loss of jobs, tax revenue, and the ripple effect of such losses throughout the local economy, will have a severely detrimental impact on the region.

The issuance of a rule preserving the continued operation of resilient baseload coal and nuclear power plants will maintain a reliable supply of electricity for the region's energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation. Preserving baseload coal and nuclear power plants will keep these needed, reliable facilities running close to home without the need to depend on distant resources,

comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,

A handwritten signature in black ink that reads "Michael J. Rubino". The signature is written in a cursive style with a large, looping initial "M".

Michael J. Rubino
Executive Director
United Way of Beaver County



[Search](#)

[Advanced Search](#)

[New Dockets](#)

[Docket Search](#)

[Daily Search](#)

[Request List](#)

[Logon](#)

[Help](#)

[Help - Accessible](#)

[Login: Guest](#)

[E-mail this page](#)

File List

Accession Number: 20171024-0012

Description: Comments of Executive Director Gayle M. Young re the Grid Resiliency Pricing Rule under RM18-1.

Type	File Name	Size
FERC Generated PDF	<input type="checkbox"/> 12512119.PDF	207567

All Image

Range From To

- [Page 1](#) 33559
- [Page 2](#) 32421
- [Page 3](#) 21389
- [Page 4](#) 23275
- [Page 5](#) 24933
- [Page 6](#) 25482
- [Page 7](#) 15155



United Way Of Lawrence County

223 North Mercer Street, Suite 101, New Castle, Pennsylvania 16101

Phone: 724.658.8528 Fax: 724.658.6394

Email: uwlawcty@comcast.net

Website: www.uwlawcty.org

Please like us on Facebook

President
Sara A. Dudash

October 18, 2017

ORIGINAL

Vice-President
Wayne J. Alexander
Sam B. Biasucci
Gerald D. Prestopine

Federal Energy Regulation Commission

Secretary
Christy L. Verenski

Attn: Kimberly Bose, Secretary

Assistant Secretary
Debbie Currie

Rm18-1

888 First Street NE

Treasurer
Jason Shaffer

Washington, DC 20426

Executive Director
Gayle M. Young

RE: Comments on Rulemaking
(RM 18-1)

FILED
SECRETARY OF THE
COMMISSION
OCT 24 P 3:05
FEDERAL ENERGY
REGULATION COMMISSION

Board of Directors

- Sherie Babb
- Barbara Bernardi
- Richard Galiano
- Cathy Ioanilli
- Charles Jackson
- Josh Lamancusa, Esq.
- Drew McDowell
- Doug McLtrot
- Sydney McKnight
- Jason Medure, Esq.
- Judge Dominick Motto
- Bradley Olson, Jr., Esq.
- Joanne Preston
- John Sarandrea
- Terri Stramba
- Harold Taylor
- Frank Telesz
- Howard Thompson

Dear Secretary Bose:

I am attaching our FERC Docket No. RM18-1-000 in response to the Grid Resiliency Pricing Rule. We strongly support keeping First Energy/Penn Power in our community because they provide stability to our community. United Way experienced a loss of \$400,000 dollars over the last 20 years leaving the United Way Campaign in corporate and employee giving. The Lawrence County community cannot sustain the loss of the type of revenue and community impact that the employees bring to our area.

We urge you to make sure our community is compensated appropriately and fully for their costs of operation and will avoid retirement of First Energy. We understand if this would happen it would take our poverty rate to that of a third-world country.

Emeritus
Dr. Mabel Paige

If you need more information or have additional questions, please feel free to contact me at gayleyoung@uwlawcty.org or 724.658.8528.

Sincerely yours,

Gayle M. Young
Gayle M. Young
Executive Director

Thanks!

Enclosure

United Way Mission: To increase the organized capacity of people to care for one another.





United Way Of Lawrence County

223 North Mercer Street, Suite 101, New Castle, Pennsylvania 16101

Phone: 724.658.8528 Fax: 724.658.6394

Email: uwlawcty@comcast.net

Website: www.uwlawcty.org

Please like us on Facebook

President
Sara A. Dudash

Vice-President
Wayne J. Alexander
Sam B. Biasucci
Gerald D. Prestopine

Secretary
Christy L. Verenski

Assistant Secretary
Debbie Currie

Treasurer
Jason Shaffer

Executive Director
Gayle M. Young

Board of Directors
Sherie Babb
Barbara Bernardi
Richard Galiano
Cathy Ioanilli
Charles Jackson
Josh Lamancusa, Esq.
Drew McDowell
Doug McIltrout
Sydney McKnight
Jason Medure, Esq.
Judge Dominick Motto
Bradley Olson, Jr., Esq.
Joanne Preston
John Sarandrea
Terri Stramba
Harold Taylor
Frank Telesz
Howard Thompson

Emeritus
Dr. Mabel Paige

October 17, 2017

Federal Energy Regulatory Commission
Secretary of the
Commission

888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

COMMENTS OF THE UNITED WAY OF LAWRENCE COUNTY

IN SUPPORT OF THE PROPOSED RESILIENCY RULE

On September 28, 2017, the Department of Energy (“DOE”) issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to “ensure that certain reliability and resiliency attributes of electric generation sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations in Western Pennsylvania will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will thus sustain the long-term viability of critical power plants, preserve and create jobs, maintain electric reliability, and provide substantial economic benefits to the many hard-working Americans living throughout the region.

United Way Mission: To increase the organized capacity of people to care for one another.



The United Way of Lawrence County or UWLC strongly supports the Proposal and shares the Secretary's urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and the loss of critical economic and reliability benefits. Without these critical units, UWLC will be challenged to support the health, education and financial stability of our community. There is no time for delay. In addition to acting promptly, FERC should also direct organized market operators to issue a comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical power plants. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Gayle M. Young
Executive Director
United Way of Lawrence County
223 North Mercer Street
New Castle, PA 16101
724.658.8528
gayleyoung@uwlawcty.org

II. DESCRIPTION OF UNITED WAY OF LAWRENCE COUNTY

The United way of Lawrence County is a fundraising organization. It was established in 1923 as a volunteer-driven organization that raises funds for various non-profit programs in Lawrence County. The funds raised through the campaign stay in our community to make sure services are available for families in need. United Way has evolved over time and is recognized as a leader/convener in our community.

III. DESCRIPTION OF UNITED WAY OF LAWRENCE COUNTY'S INTEREST IN PROCEEDING

The United Way of Lawrence County is a non-profit entity located in Western Pennsylvania close to the Ohio border. Our organization advances the health, education and financial stability of every person in our community. The continued operation of the baseload coal and nuclear power plants translates into safer and more prosperous communities. Thus, the UWLC members have a direct and substantial interest in this proceeding. As well, the unique perspective of the UWLC and its members will only serve to enhance the record in this proceeding.

IV. COMMENTS

The communities where struggling baseload coal and nuclear power plants are located are dependent on the jobs and economic development opportunities the power plants provide. The recent decline in Lawrence County electric power industry, for example, has led to reductions in operations at numerous power production and manufacturing facilities across Lawrence County and Western Pennsylvania]. This

continued decline will impact United Way of Lawrence County's ability to bring positive impacts to the 85,000 residents in the region, including support for the health, education and financial stability of our communities.

Baseload coal and nuclear plants in Western Pennsylvania provide economic opportunities to our community. This would have a catastrophic affect in our area. These companies employ many families in our area and our median income is currently at \$39,000 and this would be reduced which would affect the poverty level for Lawrence County. For example, Penn Power, New Castle Location contributes close to \$40,000 each year to our organization that supports services provided to our communities. Penn Power/ First Energy provides leadership to the United Way of Lawrence County and our Lawrence County Economic Development organization. Their leadership enhances the ability to generate new businesses and increase leadership support for community enrichment programs. The loss of jobs, tax revenue, and the ripple effect of such losses throughout the local economy, will have a severely detrimental impact on the region.

The issuance of a rule preserving the continued operation of resilient baseload coal and nuclear power plants will maintain a reliable supply of electricity for the region's energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation. Preserving baseload coal and nuclear power plants will keep these needed, reliable facilities running close to

home without the need to depend on distant resources, particularly during catastrophic events like severe storms, to fulfill our region's dynamic need for reliable electricity.

Second, premature plant closures will deplete the stable of highly skilled (and specifically trained and experienced) employees, many of whom have lived in the region for several years and who take great pride in their work. With a depletion of this skilled and experienced group of workers, and the possible replacement of these workers with more distant and perhaps less-skilled individuals, we will see a direct and adverse impact on our ability to provide services to our community. Because of the loss of jobs, the significant reduction in payments to local governments, and the decline in electricity resource and grid reliability that would result from deactivation of the nuclear and coal-fired generating facilities in Western Pennsylvania, it is essential that the FERC adopt a rule, such as that proposed by DOE, which will ensure that such generating facilities are fully compensated for their costs and will remain in operation.

In order to mitigate the risk that such generating units may be deactivated prematurely, the UWLC strongly urges FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further bolstered by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security,

attendant to the premature closure of crucial power plants. Any protracted delay in creating fully compensatory market rules will only exacerbate the problem of premature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,

A handwritten signature in black ink that reads "Gayle M. Young". The signature is written in a cursive, flowing style.

Gayle M. Young, Executive Director
United Way of Lawrence County

Document Content(s)

14722693.tif.....1-7



[Search](#)

[Advanced Search](#)

[New Dockets](#)

[Docket Search](#)

[Daily Search](#)

[Request List](#)

[Logon](#)

[Help](#)

[Help - Accessible](#)

[Login: Guest](#)

[E-mail this page](#)

File List

Accession Number: 20171013-5138

Description: Comment of Penn-Northwest Development Corporation under RM18-1. Please see attached letter.

Type	File Name	Size
MicroSoft Word	<input type="checkbox"/> PNDC Ltr of Support - 10 13 17.DOCX No description given	411605
FERC Generated PDF	<input type="checkbox"/> 12506221.PDF	273905

[Doc Info](#) [Add to Request](#) [DownLoad](#) [Reset](#) [Help](#)



October 13, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

**COMMENTS OF THE PENN-NORTHWEST DEVELOPMENT CORPORATION IN SUPPORT
OF THE PROPOSED RESILIENCY RULE**

On September 28, 2017, the Department of Energy (“DOE”) issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to “ensure that certain reliability and resiliency attributes of electric generation sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations in Mercer County will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will thus sustain the long-term viability of critical power plants, preserve and create jobs, maintain electric reliability, and provide substantial economic benefits to the many hard-working Americans living throughout the region.

The Penn-Northwest Development Corporation (“PNDC”) strongly supports the Proposal and shares the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and the loss of critical economic and reliability benefits. Without these critical units, PNDC will be challenged to support the health, education and financial stability of our community. There is no time for delay. In addition to acting promptly, FERC should also direct organized market operators to issue a



comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical power plants. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Randy P. Seitz
President/CEO
Penn-Northwest Development Corporation
39 Chestnut Avenue
Sharon, PA 16146
724-662-3705
rpseitz@penn-northwest.com

II. DESCRIPTION OF PENN-NORTHWEST DEVELOPMENT CORPORATION

As Mercer County's lead economic development agency, Penn-Northwest Development Corporation (PNDC) strives to benefit our region and make our community a better place. Penn-Northwest's business is to ensure the businesses throughout Mercer County succeed, thereby ensuring the economic vitality of our region. We serve as a strategic partner to help new and existing businesses Make it in! Mercer County.

PNDC was established in 1985 as a 501 (c)(3) private, non-profit, economic development corporation. Our mission is to attract new business and industrial investment, provide outreach and retention services to support the retention and expansion of value added business and industry, and provide coordination and support services for economic development in the Mercer County, PA region.



Since we started, PNDC has participated in more than 400 Development, Expansion, Retention and Community projects, resulting in the creation of nearly 10,000 new jobs and the retention of over 15,000 jobs. The last 32 years of Economic and Community Development activity has resulted in over \$1 billion in public/private investment in the County.

III. DESCRIPTION OF PENN-NORTHWEST DEVELOPMENT CORPORATION'S INTEREST IN PROCEEDING

The Penn-Northwest Development Corporation is a non-profit entity located in Mercer County, Pennsylvania. Our organization advances the health, education and financial stability of every person in our community. The continued operation of the baseload coal and nuclear power plants translates into safer and more prosperous communities. Thus, the PNDC members have a direct and substantial interest in this proceeding. As well, the unique perspective of the PNDC and its members will only serve to enhance the record in this proceeding.

IV. COMMENTS

The communities where struggling baseload coal and nuclear power plants are located are dependent on the jobs and economic development opportunities the power plants provide. The recent decline in Mercer County electric power industry, for example, has led to reductions in operations at numerous power production and manufacturing facilities across Mercer County and throughout Pennsylvania. This continued decline will impact PNDC's ability to bring positive impacts to nearly 115,00 residents in the County, and nearly 550,000 people in the region, including support for the health, education and financial stability of our communities.

Baseload coal and nuclear plants in the larger Mercer County region provide economic opportunities to our community. The loss of jobs, tax revenue, and the ripple effect of such losses throughout the local economy will have a severely detrimental impact on the region.



The issuance of a rule preserving the continued operation of resilient baseload coal and nuclear power plants will maintain a reliable supply of electricity for the region's energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation. Preserving baseload coal and nuclear power plants will keep these needed, reliable facilities running close to home without the need to depend on distant resources, particularly during catastrophic events like severe storms, to fulfill our region's dynamic need for reliable electricity.

Second, premature plant closures will deplete the stable of highly skilled (and specifically trained and experienced) employees, many of whom have lived in the region for several years and who take great pride in their work. With a depletion of this skilled and experienced group of workers, and the possible replacement of these workers with more distant and perhaps less-skilled individuals, we will see a direct and adverse impact on our ability to provide services to our community. Because of the loss of jobs, the significant reduction in payments to local governments, and the decline in electricity resource and grid reliability that would result from deactivation of the nuclear and coal-fired generating facilities in the Mercer County region, it is essential that the FERC adopt a rule, such as that proposed by DOE, which will ensure that such generating facilities are fully compensated for their costs and will remain in operation.

In order to mitigate the risk that such generating units may be deactivated prematurely, the PNDC strongly urges FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further bolstered by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security, attendant to the premature closure of crucial power plants. Any



protracted delay in creating fully compensatory market rules will only exacerbate the problem of pre-mature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Randy P. Seitz', written over a thin horizontal line.

Randy P. Seitz
President/CEO
Penn-Northwest Development Corporation



Search

Advanced Search

New Dockets

Docket Search

Daily Search

Request List

Logon

Help

Help - Accessible

Login: Guest

[E-mail this page](#)

File List

Accession Number: 20171017-5106

Description: Comment of Ottawa County Improvement Corporation under RM18-1.

Type	File Name	Size
PDF	<input type="checkbox"/> DOE FERC Testimony 10.17.17.PDF No description given	92550
FERC Generated PDF	<input type="checkbox"/> 12507686.PDF	96806

[Doc Info](#) [Add to Request](#) [DownLoad](#) [Reset](#) [Help](#)



October 17, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

**COMMENTS OF THE OTTAWA COUNTY IMPROVEMENT CORPORATION
IN SUPPORT OF THE PROPOSED RESILIENCY RULE**

I have been representing the Ottawa County Improvement Corporation for more than 12 years and have worked at the state and regional level in economic development capacities where retaining businesses and attracting new business has become my specialty. Over my 15+ year career, I have seen dramatic changes in Ohio's economy and of the Northwest Ohio regional economy, which is fueled by a robust manufacturing and industrial base. I can tell you firsthand that the relationship between the strength of a state's and region's economy, and the need for a resilient and reliable electricity grid, are deeply interconnected. Without an electricity grid that can withstand external interferences and compromises, economic prosperity in this nation will surely come to a standstill. This critical linkage between a resilient and reliable grid and economic prosperity has become even more crucial given the recent catastrophic events such as severe storms, the Polar Vortex and the rise of international tensions that threaten to compromise our nation's prosperity. Now, more than ever, it is essential that all prudent steps be taken to ensure that our region's economy and electricity grid are sufficiently bolstered to withstand such events.

It is with background that I write with a sense of urgency to address a recent proposal issued by the Department of Energy (“DOE”) that most of my constituents and I whole-heartedly support.

On September 28, 2017, the DOE issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to ensure that certain reliability and resiliency attributes of electric generation sources with at least a 90-day fuel supply are fully valued. Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing baseload nuclear and coal-fired electric generating stations, which are the foundational pieces of our country’s electricity grids, will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will sustain the regional economy, enhance reliability and resiliency, assist in reducing harmful emissions and maintaining air quality standards, and help avert the financial distress affecting certain coal and nuclear power plants, including one nuclear plant located in Ottawa County, Ohio. It is my fear that this plant, and others, may be retired prematurely if the Proposal is not adopted.

Because of these reasons, and many others,, I strongly support the DOE Proposal and share the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and my community’s loss of critical economic and reliability benefits. FERC has thoroughly examined how electric markets function and how those markets affect the continued operation of crucial power plants needed for reliability for some time. Additionally, FERC has conducted several technical studies and issued numerous reports reflecting the concerns over preserving the reliability and resiliency characteristics of our country’s baseload plants. Without a doubt FERC has the requisite basis to act now. There is no time for

delay. In addition to acting promptly, FERC should also direct organized market operators to issue a comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical baseload power plants with a minimum of 90-day supply of fuel onsite. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation and further jeopardizing the stability of our community's economic base.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Jamie N. Beier Grant
Director
Ottawa County Improvement Corporation
8043 W. State Route 163, #100
Oak Harbor, OH 43449
(419) 707-0164
jbgrant@ocic.biz

II. DESCRIPTION OF OTTAWA COUNTY IMPROVEMENT CORPORATION AND INTEREST IN PROCEEDING

The Ottawa County Improvement Corporation is a non-profit economic and workforce development agency located in Ottawa County, Ohio and is responsible for business retention & expansion efforts, new business attraction and workforce development services to businesses and individuals in the community. The Davis Besse Nuclear Power Station owned by FirstEnergy Corporation is located in my county, and provides over 1,500 direct and indirect jobs for my employment base alone, as well as millions of dollars in tax revenues that support local governments. The premature retirement of Davis Besse Nuclear Power Station due to the failure

of wholesale power markets in valuing key attributes, such as resiliency, will have a direct and dire impact on jobs and tax base in the community I represent. Therefore I, in my official capacity as Director have a direct and substantial interest in this proceeding.

III. COMMENTS

A. The Premature Retirement of the Davis Besse Nuclear Power Station Will Have a Significant Economic Impact in Ottawa County, Ohio

Residents of Ottawa County and throughout Northern Ohio not only work at our plant, but they also work for companies that supply an array of goods and services to the generation facilities that are at risk of closure. In addition, they are employed on major infrastructure and industrial development projects that are dependent on the continued operation of the baseload nuclear power plant. Ohio's two nuclear power plants are responsible for a GDP impact of \$510 million annually to our economy. As a result, the wages, and continued and future employment opportunities will be directly affected by the closure of these plants. Simply put, closure of Davis Besse Nuclear Power Station will all but decimate Ottawa County, Ohio's economy. A majority of our employment base will evaporate, our residential communities will become ghost towns, and an overall dramatic decline in our economy will be felt immediately. All due to a notable decline in the electric power industry that currently does not offer a balanced portfolio that reflects the true value of all energy generation attributes.

It is imperative that baseload coal and nuclear plants continue to operate in light of these dire circumstances. Not only do these coal and nuclear plants provide jobs and economic opportunities for my community, they also generate significant tax revenues that benefit the municipal entities throughout my region. These entities provide essential services to the community such as education, fire protection and police. If these generation facilities are forced to retire, an already weak recovery will be hampered, more people will lose their jobs, municipal

services will deteriorate, and more families will suffer economic pain and burdens. The impact on the region's economy will be severe.

B. Resilient Nuclear Power Plants Support Reliability

In addition to helping to avert an economic catastrophe, the issuance of a rule preserving the continued operation of resilient baseload nuclear power plants will maintain a reliable supply of electricity for the region's energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation (costs which are born fully by the customer). Preserving baseload nuclear power plants will keep these needed, reliable facilities running close to home without the need to depend on distant resources, particularly during catastrophic events like severe storms, to fulfill our region's dynamic need for reliable electricity.

Second, premature plant closures will deplete the stable of highly skilled (and specifically trained and experienced) employees, many of whom have lived in the region for several years and who take great pride in their work. With a depletion of this skilled and experienced group of workers, and the possible replacement of these workers with more distant and perhaps less-skilled individuals, utilities will see a direct and adverse impact on their ability to maintain the generation facilities that continue to operate and, as important, their ability to respond promptly to severe contingencies affecting the operation of these remaining plants in operation. In short, allowing baseload nuclear power plants to close prematurely will have an adverse impact on the reliability of the region's electricity supply and on the reliable operation of the regional electricity system.

C. The Proposed Rule Will Preserve the Environmental Benefits of Zero-Emission Nuclear Power Plants

In addition to providing a dependable source of electricity and critical economic support, nuclear-fueled generating stations are beneficial to the environment. The reliance on nuclear

generation capacity prevents the emission of hundreds of millions of tons of greenhouse gases such as carbon dioxide, sulfur dioxide, and nitrous oxide that might otherwise be produced if natural gas-fired and coal-fired generation was used instead to maintain the reliability of the interstate power grid.

Operators of other types of emission-free generating facilities, such as wind and solar-powered facilities, receive substantial financial support through production tax credits and compensation for renewable energy credits that is not available to most nuclear-fueled generators. Although both New York and Illinois have recognized the environmental benefits to be derived from continued reliance on nuclear-fueled generating facilities, and provide financial support to maintain operation of those generation facilities in their states through the sale of Zero Emission Credits, the State of Ohio has not yet established a similar means of compensating nuclear power plants for their environmental attributes. This is an opportune time for the FERC to implement a policy that adequately values baseload electricity generation with a minimum of 90-days onsite fuel as more states look to bring out-of-market subsidies into the overall pricing equation. The Proposal for the FERC to require operators of organized markets to compensate owners of nuclear-powered generating stations fully for the costs of owning and operating their generation facilities would put all such emission-free, reliable and resilient generating stations on an even footing and help to protect the bulk power supply system from disruptions.

D. The Commission Must Act Posthaste to Prevent the Premature Retirement of Resilient Baseload Nuclear Power Plants

In order to mitigate the risk that such generating units may be deactivated prematurely, I strongly urge FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further bolstered by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on

the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security, attendant to the premature closure of crucial baseload power plants. Any protracted delay in creating fully compensatory market rules will only exacerbate the problem of pre-mature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,

A handwritten signature in black ink that reads "Jamie N. Beier Grant". The signature is written in a cursive, flowing style.

Jamie N. Beier Grant
Director
Ottawa County Improvement Corporation



Search

Advanced Search

New Dockets

Docket Search

Daily Search

Request List

Logon

Help

Help - Accessible

Login: Guest

[E-mail this page](#)

File List

Accession Number: 20171023-0021

Description: Pleasants County Development Authority submits comments re the proposed Grid Resiliency Pricing Rule under RM18-1.

Type	File Name	Size
FERC Generated PDF	<input type="checkbox"/> 12510863.PDF	161712

All Image

Range From To

<input type="checkbox"/> Page 1	14299
<input type="checkbox"/> Page 2	22445
<input type="checkbox"/> Page 3	21427
<input type="checkbox"/> Page 4	24320
<input type="checkbox"/> Page 5	30929
<input type="checkbox"/> Page 6	23722



P.O. Box 339
309 Second Street
St. Marys, WV 26170

PLEASANTS COUNTY DEVELOPMENT AUTHORITY
www.pleasantcountywv.com

304.684.1220
Fax: 304.684.1229
Email: pcda@FrontierNet.net

ORIGINAL

October 17, 2017

Federal Energy Regulation Commission
ATTN: Kimberly Bose, Secretary
888 First Street NE
Washington, DC 20426

FILED
SECRETARY OF THE
COMMISSION
OCT 23 P 2:41
FEDERAL ENERGY
REGULATION COMMISSION

Dear Ms. Bose,

Enclosed are the comments of the Pleasants County Development Authority regarding the proposed Grid Resiliency Pricing Rule, FERC Docket No. RM18-1-000.

Thank you.

Sincerely,

Carl A. Guthrie

Executive Director

Pleasants County Development Authority

304.684.1220

pcda@frontiernet.net



P.O. Box 339
309 Second Street
St. Marys, WV 26170

PLEASANTS COUNTY DEVELOPMENT AUTHORITY
www.pleasantscountywv.com

304.684.1220
Fax: 304.684.1229
Email: pcda@frontier.net

October 17, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

**COMMENTS OF THE PLEASANTS COUNTY DEVELOPMENT AUTHORITY
IN SUPPORT OF THE PROPOSED RESILIENCY RULE**

On September 28, 2017, the Department of Energy (“DOE”) issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to “ensure that certain reliability and resiliency attributes of electric generation sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations in Pleasants County, West Virginia will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will thus sustain the long-term viability of critical power plants, preserve and create jobs, maintain electric reliability, and provide substantial economic benefits to the many hard-working Americans living throughout the region.

The Pleasants County Development Authority (“PCDA”) strongly supports the Proposal and shares the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and the loss of critical economic and reliability benefits. Without these critical units, Pleasants County Development Authority will be challenged to support the health, education and financial stability of our community. There is no time for delay. In addition to acting promptly, FERC should also direct organized market operators to issue a comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical power plants. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Carl A. Guthrie
Executive Director
Pleasant County Development Authority
304.684.1220
pcda@frontiernet.net

II. DESCRIPTION OF PLEASANTS COUNTY DEVELOPMENT AUTHORITY

The Authority was formed in 1988 shortly after the Quaker State Refinery announced the closure of the local plant. Our mission is to increase job opportunities for our local workforce as well as increase the tax base for our county which will improve the quality of life for all our citizens.

III. DESCRIPTION OF PLEASANTS COUNTY DEVELOPMENT AUTHORITY'S INTEREST IN PROCEEDING

The Pleasants County Development Authority is a non-profit entity located in Pleasants County, West Virginia. Our organization advances the health, education and financial stability of every person in our community. The continued operation of the baseload coal and nuclear power plants translates into safer and more prosperous communities. Thus, the PCDA members have a direct and substantial interest in this proceeding. As well, the unique perspective of the PCDA and its members will only serve to enhance the record in this proceeding.

IV. COMMENTS

The communities where struggling baseload coal and nuclear power plants are located are dependent on the jobs and economic development opportunities the power plants provide. The recent decline in Northern Ohio River Valley electric power industry, for example, has led to reductions in operations at numerous power production and manufacturing facilities across West Virginia. This continued decline will impact PCDA's ability to bring positive impacts to the over 7,500 residents in the region, including support for the health, education and financial stability of our communities.

Baseload coal and nuclear plants in West Virginia provide economic opportunities to our community. The First Energy/Pleasants Power Station not only employs 640 individuals, but also contributes over \$5 million dollars in county tax revenue which supports education and other vital services for our residents. The loss of jobs, tax revenue, and the ripple effect of such losses throughout the local economy, will have a severely detrimental impact on the region.

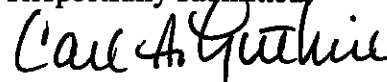
The issuance of a rule preserving the continued operation of resilient baseload coal and nuclear power plants will maintain a reliable supply of electricity for the region's energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation. Preserving baseload coal and nuclear power plants will keep these needed, reliable facilities running close to home without the need to depend on distant resources, particularly during catastrophic events like severe storms, to fulfill our region's dynamic need for reliable electricity.

Second, premature plant closures will deplete the stable of highly skilled (and specifically trained and experienced) employees, many of whom have lived in the region for several years and who take great pride in their work. With a depletion of this skilled and experienced group of workers, and the possible replacement of these workers with more distant and perhaps less-skilled individuals, we will see a direct and adverse impact on our ability to provide services to our community. Because of the loss of jobs, the significant reduction in payments to local governments, and the decline in electricity resource and grid reliability that would result from deactivation of the nuclear and coal-fired generating facilities in the Ohio River Valley, it is essential that the FERC adopt a rule, such as that proposed by DOE, which will ensure that such generating facilities are fully compensated for their costs and will remain in operation.

In order to mitigate the risk that such generating units may be deactivated prematurely, the PCDA strongly urges FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further bolstered by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security, attendant to the premature closure of crucial power plants. Any protracted delay in creating fully compensatory market rules will only exacerbate the problem of pre-mature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,



Carl A. Guthrie

Executive Director

Pleasants County Development Authority

Document Content(s)

14721060.tif.....1-6



[Search](#)

[Advanced Search](#)

[New Dockets](#)

[Docket Search](#)

[Daily Search](#)

[Request List](#)

[Logon](#)

[Help](#)

[Help - Accessible](#)

[Login: Guest](#)

[E-mail this page](#)

File List

Accession Number: 20171023-5041

Description: Comment of CLEVELAND BRANCH NAACP under RM18-1.

Type	File Name	Size
MicroSoft Word	<input type="checkbox"/> Cleveland Branch NAACP FERC Comments Docket RM18-1-000.DOCX No description given	27979
FERC Generated PDF	<input type="checkbox"/> 12510177.PDF	17313

October 20, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

**COMMENTS OF THE CLEVELAND BRANCH NAACP IN SUPPORT OF THE
PROPOSED RESILIENCY RULE**

On September 28, 2017, the Department of Energy (“DOE”) issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to “ensure that certain reliability and resiliency attributes of electric generation sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations in Ohio will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will thus sustain the long-term viability of critical power plants, preserve and create jobs, maintain electric reliability, and provide substantial economic benefits to the many hard-working Americans living throughout the region.

The Cleveland Branch NAACP (“Cleveland NAACP”) strongly supports the Proposal and shares the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and the loss of critical economic and reliability benefits. Without these critical units, Cleveland NAACP will be challenged to support the economic, social, educational and political rights of all persons in our community. There is

no time for delay. In addition to acting promptly, FERC should also direct organized market operators to issue a comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical power plants. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Danielle L. Sydnor
Chair Economic Development Committee
Cleveland Branch NAACP
16400 Miles Ave.
216-231-6260
sydnordanielle@gmail.com

II. DESCRIPTION OF CLEVELAND BRANCH NAACP

The mission of the National Association for the Advancement of Colored People is to ensure the political, educational, social, and economic equality of rights of all persons and to eliminate race based discrimination.

III. DESCRIPTION OF CLEVELAND BRANCH NAACP'S INTEREST IN PROCEEDING

The Cleveland Branch NAACP is a non-profit, 501(c)(4), entity located in Ohio. Our focus is on improving the social welfare of the community by ensuring the economic, social, educational and political rights of all persons. The continued operation of the baseload coal and nuclear power plants translates into safer and more prosperous communities. Thus, the Cleveland NAACP members have a direct and substantial interest in this proceeding. As well, the unique

perspective of the Cleveland NAACP and its members will only serve to enhance the record in this proceeding.

IV. COMMENTS

The communities where struggling baseload coal and nuclear power plants are located are dependent on the jobs and economic development opportunities the power plants provide. The recent decline in Ohio electric power industry, for example, has led to reductions in operations at numerous power production and manufacturing facilities across Ohio. This continued decline will impact Cleveland NAACP's ability to bring positive impacts to the many residents in the region, including support for the health, education and financial stability of our communities.

Baseload coal and nuclear plants in Ohio provide economic opportunities to our community. First Energy contributes \$25,000 each year to our organization, and also supports other organizations like the United Way, Salvation Army, Habitat for Humanity and Red Cross. This financial support allows us to continue providing voter education and registration efforts, financial literacy, and health and wellness initiatives to the community. The loss of jobs, tax revenue, and the ripple effect of such losses throughout the local economy, will have a severely detrimental impact on the region.

The issuance of a rule preserving the continued operation of resilient baseload coal and nuclear power plants will maintain a reliable supply of electricity for the region's energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation. Preserving baseload coal and nuclear power plants will keep these needed, reliable facilities running close to home without the need to depend on distant resources,

particularly during catastrophic events like severe storms, to fulfill our region's dynamic need for reliable electricity.

Second, premature plant closures will deplete the stable of highly skilled (and specifically trained and experienced) employees, many of whom have lived in the region for several years and who take great pride in their work. With a depletion of this skilled and experienced group of workers, and the possible replacement of these workers with more distant and perhaps less-skilled individuals, we will see a direct and adverse impact on our ability to provide services to our community. Because of the loss of jobs, the significant reduction in payments to local governments, and the decline in electricity resource and grid reliability that would result from deactivation of the nuclear and coal-fired generating facilities in Ohio, it is essential that the FERC adopt a rule, such as that proposed by DOE, which will ensure that such generating facilities are fully compensated for their costs and will remain in operation.

In order to mitigate the risk that such generating units may be deactivated prematurely, the Cleveland NAACP strongly urges FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further bolstered by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security, attendant to the premature closure of crucial power plants. Any protracted delay in creating fully compensatory market rules will only exacerbate the problem of pre-mature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but

comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,

Danielle L. Sydnor
Chair Economic Development Committee
Cleveland Branch NAACP

[Search](#)[Advanced Search](#)[New Dockets](#)[Docket Search](#)[Daily Search](#)[Request List](#)[Logon](#)[Help](#)[Help - Accessible](#)[Login: Guest](#)[E-mail this page](#)

File List

Accession Number: 20171020-5152**Description:** Comment of Leadership Ashtabula County under RM18-1.

Type	File Name	Size
MicroSoft Word	<input type="checkbox"/> LEADERship Ashtabula, Comments FE.DOCX No description given	32232
FERC Generated PDF	<input type="checkbox"/> 12509761.PDF	16991

October 20, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

**COMMENTS OF LEADERSHIP Ashtabula County IN SUPPORT OF THE
PROPOSED RESILIENCY RULE**

On September 28, 2017, the Department of Energy (“DOE”) issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to “ensure that certain reliability and resiliency attributes of electric generation sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations in Northeast Ohio will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will thus sustain the long-term viability of critical power plants, preserve and create jobs, maintain electric reliability, and provide substantial economic benefits to the many hard-working Americans living throughout the region.

LEADERSHIP Ashtabula County strongly supports the Proposal and shares the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and the loss of critical economic and reliability benefits. Without these critical units, LEADERSHIP Ashtabula County will be challenged to support the health, education and financial stability of our community. There is no time for delay. In addition to

acting promptly, FERC should also direct organized market operators to issue a comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical power plants. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Laura E. Jones
Executive Director
Leadership Ashtabula County
PO Box 643
Ashtabula, OH 44005
440-813-9053
laura@leadershipac.org

II. DESCRIPTION OF LEADERSHIP Ashtabula County

Community LEADERSHIP and Educational Organization

III. DESCRIPTION OF LEADERSHIP Ashtabula County's INTEREST IN PROCEEDING

LEADERSHIP Ashtabula County is a non-profit entity located in Ashtabula, Ohio. Our organization advances the health, education and financial stability of every person in our community. The continued operation of the baseload coal and nuclear power plants translates into safer and more prosperous communities. Thus, the LEADERSHIP Ashtabula County members have a direct and substantial interest in this proceeding. As well, the unique perspective of LEADERSHIP Ashtabula County and its members will only serve to enhance the record in this proceeding.

IV. COMMENTS

The communities where struggling baseload coal and nuclear power plants are located are dependent on the jobs and economic development opportunities the power plants provide. The recent decline in Ohio's electric power industry, for example, has led to reductions in operations at numerous power production and manufacturing facilities across Northeast Ohio. This continued decline will impact LEADERship Ashtabula County's ability to bring positive impacts to the Northeast Ohio residents in the region, including support for the health, education and financial stability of our communities.

Baseload coal and nuclear plants in Northeast Ohio provide economic opportunities to our community. For example, FirstEnergy contributes dollars each year to our organization that supports services provided to our communities, including entrepreneurship programs for youth, leadership programs for hundreds of high school students, community programming, Leadership development for our corporate and nonprofit, government and educational leaders. The loss of jobs, tax revenue, and the ripple effect of such losses throughout the local economy, will have a severely detrimental impact on the region.

The issuance of a rule preserving the continued operation of resilient baseload coal and nuclear power plants will maintain a reliable supply of electricity for the region's energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation. Preserving baseload coal and nuclear power plants will keep these needed, reliable facilities running close to home without the need to depend on distant resources, particularly during catastrophic events like severe storms, to fulfill our region's dynamic need for reliable electricity.

Second, premature plant closures will deplete the stable of highly skilled (and specifically trained and experienced) employees, many of whom have lived in the region for several years and who take great pride in their work. With a depletion of this skilled and experienced group of workers, and the possible replacement of these workers with more distant and perhaps less-skilled individuals, we will see a direct and adverse impact on our ability to provide services to our community. Because of the loss of jobs, the significant reduction in payments to local governments, and the decline in electricity resource and grid reliability that would result from deactivation of the nuclear and coal-fired generating facilities in Northeast Ohio it is essential that the FERC adopt a rule, such as that proposed by DOE, which will ensure that such generating facilities are fully compensated for their costs and will remain in operation.

In order to mitigate the risk that such generating units may be deactivated prematurely, LEADERSHIP Ashtabula County strongly urges FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further bolstered by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security, attendant to the premature closure of crucial power plants. Any protracted delay in creating fully compensatory market rules will only exacerbate the problem of pre-mature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the

long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,

Laura Jones
Executive Director
LEADERship Ashtabula County



Search

Advanced Search

New Dockets

Docket Search

Daily Search

Request List

Logon

Help

Help - Accessible

Login: Guest

[E-mail this page](#)

File List

Accession Number: 20171019-5032

Description: Comments of Pleasants Area Chamber of Commerce under RM18-1.
(Erroneously filed)

Type	File Name	Size
PDF	<input type="checkbox"/> 1st Energy FERC comments.PDF No description given	187782
FERC Generated PDF	<input type="checkbox"/> 12508936.PDF	216789

[Doc Info](#) [Add to Request](#) [DownLoad](#) [Reset](#) [Help](#)

You don't have permission to access this document.
This document (eLibrary accession no. **20171017-5082**) is Privileged.
The public may file a FOIA request under 18 C.F.R. 388.108.



Search

Advanced Search

New Dockets

Docket Search

Daily Search

Request List

Logon

Help

Help - Accessible

Login: Guest

[E-mail this page](#)

File List

Accession Number: 20171023-5158

Description: Comment of Pleasants Area Chamber of Commerce under RM18-1.

Type	File Name	Size
PDF	<input type="checkbox"/> FERC comments.PDF No description given	187782
FERC Generated PDF	<input type="checkbox"/> 12510486.PDF	216777

[Doc Info](#) [Add to Request](#) [DownLoad](#) [Reset](#) [Help](#)

October 19, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

**COMMENTS OF THE PLEASANTS AREA CHAMBER OF COMMERCE IN
SUPPORT OF THE PROPOSED RESILIENCY RULE**

On September 28, 2017, the Department of Energy (“DOE”) issued the “Grid Resiliency Pricing Rule” (the “Proposal”) directing the Federal Energy Regulatory Commission (“FERC”) to adopt a rule requiring operators of organized markets to “ensure that certain reliability and resiliency attributes of electric generation sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations in West Virginia will be compensated appropriately and fully for their costs of operation and will avoid premature retirement. Adoption of that rule will thus sustain the long-term viability of critical power plants, preserve and create jobs, maintain electric reliability, and provide substantial economic benefits to the many hard-working Americans living throughout the region.

The Pleasants Area Chamber of Commerce strongly supports the Proposal and shares the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC has the ability to act, and must act, without undue delay to avoid premature closure of crucial power plants and the loss of critical economic and reliability benefits. Without these critical units, we believe First Energy will be challenged to support the health, education and financial stability of our community. There is no time for delay. In addition to acting

promptly, FERC should also direct organized market operators to issue a comprehensive and enduring set of rules, based on the regulatory language of the Proposal, for the proper compensation of critical power plants. Protracted proceedings undertaken by organized market operators that fail to develop fair, compensatory and transparent rules will only engender market uncertainty and delay in providing sufficient compensation to these facilities, thereby jeopardizing the operation of the very plants that the DOE seeks to maintain in operation.

I. Communications

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Jody Murphy
Executive Director
Pleasants Area Chamber of Commerce
309 Second St. St. Marys, WV 26170
304-684-9909
pleasantschamber@frontiernet.net

II. Description of Pleasants Area Chamber of Commerce

The Pleasants Chamber is a 501(c)3 organization devoted to the promotion, growth and development of the Pleasants Area business community and climate.

III. Description of Pleasants Area Chamber of Commerce's Interest in Proceeding

The Pleasants Chamber is a non-profit entity located in Pleasants County, West Virginia. Our organization advances the health, education and financial stability of every person in our community. To that end, we remain keenly vigilant on legislation and policies that may have a negative effect on our coal-fired Pleasants Power Station; a station that employs more than 240 people. This plant is one of the largest private employers in our county. The continued operation of the baseload coal and nuclear power plants translates into safer and more prosperous communities. Thus, our Chamber, our community has a direct and substantial interest in this

proceeding. As well, the unique perspective of the Pleasants Chamber and its members will only serve to enhance the record in this proceeding.

IV. Comments

The communities where struggling baseload coal and nuclear power plants are located are dependent on the jobs and economic development opportunities the power plants provide. The recent decline in West Virginia electric power industry, for example, has led to reductions in operations at numerous power production and manufacturing facilities across our state and region – effecting both West Virginia and Ohio. This continued decline will impact the Pleasants Chamber’s ability to bring positive impacts to our members and residents in the region, including support for the health, education and financial stability of our communities.

Baseload coal and nuclear plants in West Virginia provide economic opportunities to our community. Again, our coal-fired plant is one of the largest private employers in the county, paying millions in taxes and supporting an array of community and charitable causes. The loss of jobs, tax revenue, and the ripple effect of such losses throughout the local economy, will have a severely detrimental impact on the region.

The issuance of a rule preserving the continued operation of resilient baseload coal and nuclear power plants will maintain a reliable supply of electricity for the region’s energy-intensive economy in two ways. First, the preservation of certain plants will avoid the need to replace lost generation with imports and the associated construction of infrastructure to facilitate such importation. Preserving baseload coal and nuclear power plants will keep these needed, reliable facilities running close to home without the need to depend on distant resources, particularly during catastrophic events like severe storms, to fulfill our region’s dynamic need for reliable electricity.

Second, premature plant closures will deplete the stable of highly skilled (and specifically trained and experienced) employees, many of whom have lived in the region for several years and who take great pride in their work. With a depletion of this skilled and experienced group of workers, and the possible replacement of these workers with more distant and perhaps less-skilled individuals, we will see a direct and adverse impact on our ability to provide services to our community. Because of the loss of jobs, the significant reduction in payments to local governments, and the decline in electricity resource and grid reliability that would result from deactivation of the nuclear and coal-fired generating facilities in the Mid-Ohio Valley it is essential that the FERC adopt a rule, such as that proposed by DOE, which will ensure that such generating facilities are fully compensated for their costs and will remain in operation.

In order to mitigate the risk that such generating units may be deactivated prematurely, the Pleasants Chamber strongly urges FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further bolstered by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security, attendant to the premature closure of crucial power plants. Any protracted delay in creating fully compensatory market rules will only exacerbate the problem of pre-mature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the

long-term and without the prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

Respectfully submitted,

Jody Murphy
Executive Director
Pleasants Area Chamber of Commerce



[Search](#)

[Advanced Search](#)

[New Dockets](#)

[Docket Search](#)

[Daily Search](#)

[Request List](#)

[Logon](#)

[Help](#)

[Help - Accessible](#)

[Login: Guest](#)

[E-mail this page](#)

File List

Accession Number: 20171020-5047

Description: Jefferson County Township Association under RM18-1.

Type	File Name	Size
PDF	<input type="checkbox"/> Jefferson County Township Association.PDF No description given	135875
FERC Generated PDF	<input type="checkbox"/> 12509530.PDF	161660

[Doc Info](#) [Add to Request](#) [DownLoad](#) [Reset](#) [Help](#)

October 18, 2017

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

Re: Grid Resiliency Pricing Rule
FERC Docket No. RM18-1-000

COMMENTS FROM THE JEFFERSON COUNTY (OHIO) TOWNSHIP ASSOCIATION

IN SUPPORT OF THE PROPOSED RESILIENCY RULE

I have been representing the Jefferson County Township Association (JCTA) for the last 17 years. In that time, I have seen dramatic changes in the economy of Jefferson County. The recession of 2001 had a devastating effect on residents and the area is still lagging behind as reflected in the August 2017 Jefferson County unemployment rate of 7.0, significantly behind the 5.4 Ohio and the 4.3 US rates. Understanding that all portions of the state are not equally well off, the important connection between the strength of a region's economy and the need for a robust and reliable electricity grid to maintain that economy and help it grow is critical. Now, more than ever, it is essential that all available steps be taken to ensure that Jefferson County's economy and electrical grid are sufficient to withstand any catastrophic interruption to the electrical network. *It is with this background that I write with a sense of urgency to address a recent proposal issued by the Department of Energy ("DOE") that most of my constituents and I whole-heartedly support.*

On September 28, 2017, the DOE issued the "Grid Resiliency Pricing Rule" (the "Proposal") directing the Federal Energy Regulatory Commission ("FERC") to adopt a rule requiring operators of organized markets to "ensure that certain reliability and resiliency attributes of electric generation

sources are fully valued.” Such a rule, as contemplated by the regulatory language of the Proposal, will ensure that existing nuclear and coal-fired electric generating stations, including those in Jefferson County will be compensated appropriately and fully for their costs of operation and will avoid premature retirement.

Adoption of that rule will:

1. Sustain the regional economy
2. Enhance reliability and resiliency of the electric grid
3. Assist in reducing harmful emissions

The rule adoption would avert the premature closing and financial distress caused by the closing of the W. H. Sammis Plant, in the Southeastern Region of Ohio and primarily Jefferson County, if the Proposal is not adopted.

Hence, I strongly support the Proposal and share the Secretary’s urgency that FERC act promptly to direct operators of organized markets to issue the requested rule. FERC

1. Must act now
2. Should issue a comprehensive and enduring set of rules for the proper compensation of critical power plants

Delaying proceedings will put at risk the plants that the DOE seeks to maintain and keep in operation.

I. COMMUNICATIONS

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Terry Bell
Vice President
Jefferson County Township Association
1060 County Highway 54
Richmond, Ohio 43944

740.317.5693 C
ram2k@frontier.com

II. DESCRIPTION OF JEFFERSON COUNTY TOWNSHIP ASSOCIATION AND INTEREST IN PROCEEDING

Terry Bell, Vice President JCTA, is an appointed official in Jefferson County representing 14 townships and is responsible for

1. Working as part of a leadership team consisting of JCTA Officers
2. Providing information to JCTA officers and trustees on local / state issues
3. Presenting testimony to state legislators on behalf of JCTA officers and trustees
4. Promoting issues related to JCTA and townships through print / visual media

The W. H. Sammis Power Plant, owned by FirstEnergy Corporation, is located in my district, and provides 400 direct, 140 FTE indirect construction jobs. Through the multiplier effect, an additional 520 jobs are generated for residents of Jefferson and surrounding counties in the tristate area, as well as \$5.5 million dollars in tax revenues that support local governments (2014). The premature retirement of W. H. Sammis Power Plant due to the failure of wholesale power markets in valuing key attributes, such as resiliency, will have a direct impact on jobs and the tax base in the community I represent. Therefore, in my official capacity as JCTA Vice President, the 14 townships and I have a direct and substantial interest in this proceeding.

III. COMMENTS

A. The Premature Retirement of W. H. Sammis Power Plant Will Have a Significant Economic Impact in Jefferson County

Operations at the W. H. Sammis Power Plant directly and indirectly support an estimated 1,100 jobs. Economic implications for a negative relationship between job losses and per capita income is high for residents and those who work for companies that supply an array of goods and services to the generation facilities that are at risk of closure. The 2014 dollar value of the economic impact W. H. Sammis Power Plant on the regional economy in Ohio, West Virginia and Pennsylvania is

1. \$585.62 million dollars-annual economic impact on tristate area
2. \$45.9 million dollars-annual income for direct / indirect employees in the tristate area
3. \$5.5 million dollars-property, sales and income tax revenues / tristate area

It is no secret that the economy of Jefferson County and Eastern Ohio has struggled for many years. Should FERC delay action on adopting the “Grid Resiliency Pricing Rule” (the “Proposal”), the stage would be set for an economic catastrophe for my constituents directly affected by the closure of these plants. Simply put, the lost jobs caused by closure of the W. H. Sammis Power Plant will weaken the local economy and will cause a ripple effect for the remaining manufacturing jobs in Jefferson County. For example, the recent decline in the electric power industry has led to reductions in operations, lost jobs, decreased tax revenues and decreased capital improvement expenditures at numerous power production and manufacturing facilities across Jefferson County, West Virginia and Pennsylvania. This has led to extreme financial hardship for the 66,704 residents and families in Jefferson County including my constituents directly or indirectly employed in this industry.

It is imperative that W. H. Sammis Power Plant, a baseload coal plant, continues to operate in light of these dire circumstances. Not only does this coal and other plants provide jobs and economic opportunities for my constituents, they provide a tax base that supports education, fire protection and police. If the “Sammis” facility is forced to retire, the per capita income of the county will decrease,

more people will lose their jobs, municipal services will deteriorate and more families will suffer economic pain and burdens. The impact of the closing of W. H. Sammis Power Plant on the region's economy would be severe.

B. Resilient W. H. Sammis Power Plant Power Plants Support Reliability

In addition to helping to avert an economic catastrophe, the issuance of a rule preserving the continued operation of resilient baseload coal power plants will maintain a reliable supply of electricity for the region's energy-intensive economy by:

1. Avoiding the need to replace lost generation with imports and having reliable facilities running close to home
2. Depleting the pool of highly skilled (and specifically trained and experienced) employees

In short, allowing baseload coal power plants to close prematurely will have an adverse impact on the reliability of the region's workforce, electrical supply and on the reliable operation of the regional electricity system.

C. The Proposed Rule Will Preserve the Environmental Benefits of Zero-Emission Nuclear Power Plants

In addition to providing a dependable source of electricity and critical economic support, nuclear-fueled generating stations are beneficial to the environment. The reliance on nuclear generation capacity prevents the emission of hundreds of millions of tons of greenhouse gases such as carbon dioxide, sulfur dioxide, and nitrous oxide that might otherwise be produced if natural gas-fired and coal-fired generation was used instead to maintain the reliability of the interstate power grid.

Operators of other types of emission-free generating facilities, such as wind and solar-powered facilities, receive substantial financial support through production tax credits and compensation for renewable energy credits that is not available to most nuclear-fueled generators. Although both New

York and Illinois have recognized the environmental benefits to be derived from continued reliance on nuclear-fueled generating facilities, and provide financial support to maintain operation of those generation facilities in their states through the sale of Zero Emission Credits, the State of Ohio has not yet established a similar means of compensating nuclear power plants for their environmental attributes. The Proposal for the FERC to require operators of organized markets to compensate owners of nuclear-powered generating stations fully for the costs of owning and operating their generation facilities would put all such emission-free generating stations on an even footing. More importantly, it would recognize the value of the reliability and resiliency attributes of nuclear-fueled generating stations that help to protect the bulk power supply system from disruptions.

D. The Commission Must Act Posthaste to Prevent the Premature Retirement of Resilient Baseload Coal Power Plants

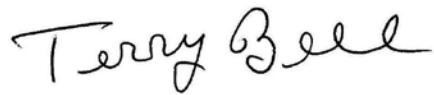
In order to mitigate the risk that such generating units may be deactivated prematurely, I strongly urge FERC to adopt the rule proposed by the DOE as promptly and comprehensively as possible. FERC has a sufficient record to act that will be further reinforced by the comments considered in this proceeding. FERC has thoroughly considered the impact of electric markets on the sustained operation of at-risk power plants and, as noted by the Secretary of the DOE, the time to act is now given the severe impacts to system reliability and resilience, and national security, attendant to the premature closure of crucial power plants. Any protracted delay in creating fully compensatory market rules will only exacerbate the problem of pre-mature closures.

In acting promptly, FERC should also direct the organized market operators to issue a rule that is not only compensatory (and based on the regulatory language of the Proposal) but comprehensive and enduring. The rules to be issued by operators of organized markets should be fair and transparent, and should ensure that critical power plants can continue to operate for the long-term and without the

prospect of repeated re-examination and adjustment to their market compensation. The uncertainty that less than comprehensive and enduring market rules will engender will defeat the very purpose of preserving the extended operation of these much-needed power plants.

What isn't considered in the effect of FERC's inactivity provided in sections C. & D. and what MUST be considered is *the very real and extensive human aftermath that will result in the severe economic hardships for the residents of Jefferson County and Eastern Ohio.*

Respectfully submitted,

A handwritten signature in black ink that reads "Terry Bell". The signature is written in a cursive, flowing style.

Terry Bell
Vice President
Jefferson County Township Association