

45CSR44
CONTROL OF GREENHOUSE GAS EMISSIONS FROM EXISTING COAL FIRED ELECTRIC
UTILITY GENERATING UNITS
RESPONSE TO COMMENTS

The WV Department of Environmental Protection (DEP), Division of Air Quality (DAQ) commenced the public comment period for the proposed repeal of legislative rule 45CSR44 on June 2, 2023. The public comment period concluded July 6, 2023, after satisfying the 30-day period. A public hearing was held virtually on July 6, 2023. The purpose of the public comment period and hearing was to accept oral and written comments on the proposed revisions to 45CSR44.

There were two written comments received during the public comment period from Mr. Duane Nichols of Mon Valley Clean Air Coalition (MVCAC), and Mr. James Kotcon, Conservation Chair of WV Chapter of Sierra Club (WV SC). Three persons provided oral comments during the public hearing, some of which also provided written comments: Ms. Betsy Lawson, Mr. Duane Nichols of Mon Valley Clean Air Coalition (MVCAC), Mr. James Kotcon, Conservation Chair of WV Chapter of Sierra Club (WV SC). A summary of the consolidated comments and responses are provided below.

The original comments received and the public hearing transcript are provided as part of the formal rulemaking record.

Commenter 1: Ms. Betsy Lawson

COMMENT 1: I would just like to endorse what Jim Kotcon (WV Chapter of the Siera Club) and Dwayne Nichols (Mon Valley Clean Air Coalition) have said. I think what they said is very important and we have to act now.

RESPONSE 1: Please refer to the RESPONSES under Commenter 3.

COMMENT 2: I hope that the budget for the DEP includes more inspectors, so that these new regulations can be properly and enforced.

RESPONSE 2: Thank you for your comment, a response is not necessary.

Commenter 2: Mon Valley Clean Air Coalition

COMMENT 3: It's regretful that our members and friends will not have the opportunity in this hearing to send in comments also supporting such strong and important comments as these because these proceedings are coming to a close at this moment. Written comment periods need to end no earlier than three days after a verbal comment period, to give all concerned time to revise and extend their thoughts, ideas, and written comments. This is both logical and necessary for a rational approach to the public role.

RESPONSE 3: The purpose of a public hearing is different than that of a public meeting. A public hearing is regulatory in nature with the sole purpose of receiving oral comments on the record in addition to or in lieu of written comments, unlike a public meeting that includes an interactive and educational component in addition to taking comments. The requirement for public hearings is to provide a full 30-day public notice period prior to the public hearing. The rulemaking timeline is dictated by Office of the

Secretary of State and does not require a public hearing, although the DAQ does so to meet other federal regulatory requirements. The public comment period commenced June 2, 2023 and concluded July 6, 2023, allowing more than 30-days required by federal regulatory requirements.

COMMENT 4: We support the comments, submitted on behalf of the Sierra Club. We wholeheartedly and fully and strongly endorse these comments and believe that they bring forward a perspective that is beyond the importance that we can make in stating our support from them.

RESPONSE 4: Please refer to the RESPONSES under Commenter 3.

Commenter 3: WV Siera Club

COMMENT 5: We do not oppose repeal of this rule. If you may recall when it was first promulgated a few years ago, we were very critical of this rule because it was so inadequate in achieving the needed greenhouse gas reductions. The rule fell short in several important ways. In particular, the rule, like the EPA Affordable Clean Energy rule (ACE) on which it is based, fails to adequately address climate change, the very reason for the rule's existence. The emissions reductions that would be achieved were negligible, and fail to protect the health of West Virginians, and the health of our environment.

It is becoming increasingly evident that the climate crisis is much more serious than was believed even a few years ago, and requires rapid reductions in greenhouse gas emissions. Emissions of greenhouse gases are cumulative, and delays today mean we must take much more draconian steps in the near future. A simple repeal of 45CSR44 also fails to account for indirect health benefits from more stringent emissions reductions. Reductions in total greenhouse gas emissions would likewise reduce the emissions of harmful fine particulates, NO_x, SO₂ and other pollutants.

RESPONSE 5: Thank you for your comment, a response is not necessary.

COMMENT 6: Do you know when the highest temperature ever recorded averaged over Planet Earth occurred? The answer is yesterday. The record before that was set the day before. The next highest record was the day before that. We've had three days in a row of record-setting temperatures here on Planet Earth, and we need to recognize, as most meteorologists do, that we are approaching a climate crisis.

RESPONSE 6: Thank you for your comment, a response is not necessary.

COMMENT 7: Rather than a simple repeal, which would leave WV with no greenhouse gas rule at all, we recommend replacing the rule to regulate greenhouse gas emissions from all fossil fuel-fired power plants, not just coal, and that we need to be very proactive in getting West Virginia ready for the need to reduce those greenhouse gas emissions. We would point out that the reductions in those greenhouse gas emissions would also reduce other air pollutants, such as volatile organic compounds, sulfur dioxide, nitrous oxides, particulate matter, et cetera, and would save lives. The failure to act on greenhouse gas emissions will cost West Virginia lives.

This rule should be replaced with a rule with language modeled on EPA's proposed New Source Performance Standards for Greenhouse Gas Emissions..., released May 3, 2023 (available at: <https://www.federalregister.gov/documents/2023/05/23/2023-10141/new-source-performance-standards-for-greenhouse-gas-emissions-from-new-modified-and-reconstructed>). This would require carbon capture sequestration in some cases. In other cases, it may require the use of alternative fuels such as hydrogen that are not emitting greenhouse gases. Such a rule would go a long way to achieving the

greenhouse gas emissions reductions needed in this decade. It would be a proactive step that would position West Virginia as a leader in these needed reductions in greenhouse gas emissions. It is urgent. It is imperative that you do so. It is one of the things that our future generations will demand of us. We are running out of time and we need to move very quickly on that issue.

RESPONSE 7: The DAQ does not propose legislative rules based on U.S. EPA proposed rules, rather it proposes state rules which typically adopt the U.S. EPA final rules, as it did when 45CSR44 was initially promulgated. Typically, a federal regulation is revised or clarified when the final rule is published in response to the comments received during the federal public comment period.



Jennings, Laura M <laura.m.jennings@wv.gov>

Tonight's Hearing

Duane Nichols <nichols330@gmail.com>
To: Laura.M.Jennings@wv.gov
Cc: depadvocate@wv.gov

Thu, Jul 6, 2023 at 4:59 PM

Written comment periods need to end no earlier than three days after a verbal comment period, to give all concerned time to revise and extend their thoughts, ideas, and written comments.

This is both logical and necessary for a rational a rational approach to the public role.

Duane Nichols, MVCAC

Sent from my iPad



**SIERRA
CLUB**

Sierra Club
West Virginia Chapter
P.O. Box 4142
Morgantown, WV 26504

July 6, 2023

Laura Jennings
WVDEP – Division of Air Quality
601 57th St., SE
Charleston, WV 25304
Via e-mail to: Laura.M.Jennings@wv.gov

Re: Comments on Air Quality draft rules

Dear Ms. Jennings:

Please accept the following comments on behalf of the WV Chapter of Sierra Club, and our approximately 2600 members.

45-CSR-1. Alternative emissions limitations during Startup and shutdown operations.

In general, we support the proposed changes as important steps to limit pollution emissions. Many facilities emit large amounts of pollution during Startup, Shutdown and Malfunction (SSM) events, often at levels that have disproportionate impacts on air quality and that greatly exceed the annual permit limits for normal operations. Please consider the following additional suggestions:

- 1) Editorial Note. The “Summary of changes in the rule” indicates that “malfunctions” was removed from the title of the rule, but the word removed is “maintenance”.
- 2) The revisions do not appear to address Alternative Emissions Limits (AELs) during “malfunctions”. Although section 2.6 defines malfunction, and section 2.11 defines SSM to include malfunction, it is not clear how emissions during a malfunction are monitored or limited, or how these apply to enforcement, and the current draft of the rule does not address these. Likewise, the language regarding SSM in other rules (e.g., 45-CSR-2-9) addresses malfunctions but is vague as to how emissions limits would be enforced. The failure to include emissions during malfunctions would expose citizens to air pollution that may threaten their health, and leaves these citizens with few options other than “hold your breath”. It also reduces any incentive for owners or operators to minimize such malfunctions. **We recommend that the rule be revised to incorporate monitoring and reporting requirements and enforceable limits for emissions during malfunctions. The rule should explicitly state that excess emissions resulting from malfunctions should be treated as a violation.** We note that regulators and citizens can use discretion as to whether events were preventable, and that a federal court would be unlikely to award penalties if events were truly unavoidable. However, treating such excess emissions as a violation

provides a necessary incentive for owners and operators to exercise due diligence to prevent upsets that are actually preventable.

- 3) Section 3.2.3 requires the Secretary to submit AELs to EPA as a SIP revision. We believe that states may not unilaterally amend provisions in an approved SIP through permit provisions. **We support this provision as a necessary check on industry efforts to allow higher emissions limits through amorphous definitions of such events.**
- 4) Section 4.1 requires an owner or operator to apply for an AEL if they cannot comply with the limits required in other rules. Section 4.2.3 requires the owner or operator to describe the alternative control strategy proposed for SS. However, nothing appears to require an owner or operator to adopt the lowest achievable emissions rate for the pollution controls proposed in applying for the AEL. While section 5.1.5 requires that “all practicable steps are taken to minimize the impact of emissions ...”, **we recommend that the rule specifically base the AEL on the lowest achievable, or best available technology, as appropriate for that area.**

45-CSR-2, 3, 5, 6, 7, 10, and 21.

- 5) These proposed amendments to rules appear to be primarily focused on upgrading the rule to meet the intent of the SSM modifications in 45-CSR-1. We support these proposed changes, subject to the need to improve 45-CSR-1 as outlined above.

45-CSR-8, Ambient Air Quality Standards; 45-CSR-16, Standards of performance for new stationary sources; and 45-CSR-34, Emissions standards for hazardous air pollutants.

- 6) We support updating the rule to incorporate the latest EPA standards.

45-CSR-44. Control of Greenhouse Gas Emissions From Existing Coal-Fired Electric Utility Generating Units

- 7) We do not oppose repeal of this particular rule, because it fell short in several important ways. In particular, the rule, like the EPA Affordable Clean Energy rule (ACE) on which it is based, fails to adequately address climate change, the very reason for the rule’s existence. The emissions reductions that would be achieved were negligible, and fail to protect the health of West Virginians, and the health of our environment.

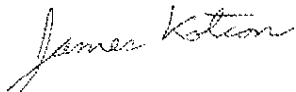
It is becoming increasingly evident that the climate crisis is much more serious than was believed even a few years ago, and requires rapid reductions in greenhouse gas emissions. Emissions of greenhouse gases are cumulative, and delays today mean we must take much more draconian steps in the near future. A simple repeal of 45-CSR-44 also fails to account for indirect health benefits from more stringent emissions reductions. Reductions in total greenhouse gas emissions would likewise reduce the emissions of harmful fine particulates, NO_x, SO₂ and other pollutants.

- 8) Rather than a simple repeal, which would leave WV with no greenhouse gas rule at all, **we recommend replacing the rule with a rule with language modeled on EPA’s proposed**

New Source Performance Standards for Greenhouse Gas Emissions..., released May 3, 2023 (available at: <https://www.federalregister.gov/documents/2023/05/23/2023-10141/new-source-performance-standards-for-greenhouse-gas-emissions-from-new-modified-and-reconstructed>). Such a rule would go a long way to achieving the greenhouse gas emissions reductions needed in this decade. It would be a proactive step that would position West Virginia as a leader in these needed reductions in greenhouse gas emissions.

Thank you for the opportunity to provide these comments.

Sincerely,



James Kotcon
Conservation Chair
WV Chapter of Sierra Club
jkotcon@gmail.com
304-594-3322 (cell)

IN RE: DIVISION OF AIR QUALITY PUBLIC HEARING

RULE 45CSR44

07/06/2023



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Charleston, WV 25301

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schedulerealtime@gmail.com

Realtimereporters.net

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
PUBLIC HEARING

IN RE:

DIVISION OF AIR QUALITY
PROPOSED 2024 LEGISLATIVE RULES
RULE 45CSR44

* * *

Thursday, July 6, 2023
Held remotely via Google Meets
7:23 p.m.

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Appearing on behalf of the WV DEP

Nicole Ernest
Laura Jennings
Sandra Adkins

Tammie Trigg, Court Reporter

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2 P R O C E E D I N G S

3 * * *

4 MS. JENNINGS: Is the court reporter ready
5 to proceed to the next and final hearing?

6 THE REPORTER: Yes.

7 MS. JENNINGS: Thank you.

8 The virtual public hearing for the proposed
9 legislative rule 45CSR44, Control of Greenhouse Gas
10 Emissions from Existing Coal-Fired Electric Utility
11 Generating Units, will now come to order on this 6th day
12 of July 2023.

13 Oral comments and testimony will be accepted
14 until the close of this hearing and will be made part of
15 the rulemaking record. Any question regarding revisions
16 to the rule should be included with your comments and
17 any such question will be addressed as part of the
18 response to comments in the rulemaking record.

19 The rule is proposed for repeal in its
20 entirety because the adopted federal counterpart
21 regulation, the Affordable Clean Energy, or ACE, rule
22 was vacated by the D.C. Circuit on January 19, 2021, and
23 remanded to the U.S. EPA. The rule was promulgated in
24 the 2021 session.

25 The floor is now open for comments. As a

1 reminder, please keep your comments on topic and limit
2 them to five minutes. Nicole, has anyone preregistered
3 to provide comments on the proposed repeal of Rule 44?
4 If so, please unmute their line and call on them now.

5 MS. ERNEST: Thanks, Laura.

6 For those who have preregistered to speak, I
7 will call your name. Please unmute your line. If we do
8 not hear from you when called upon, we will proceed to
9 the next commenter and call on you again at the end. I
10 apologize in advance if I pronounce anyone's name
11 incorrectly. I will call two names, the person who is
12 commenting and the next commenter so they may get ready.
13 The first is James Kotcon. Next in line is Duane
14 Nichols.

15 James, please clearly state your name and
16 indicate if you're representing any group or
17 organization.

18 MR. KOTCON: My name is James Kotcon. I am
19 chapter chair for the West Virginia Sierra Club. We do
20 not necessarily oppose the repeal of this rule. If you
21 may recall when it was first promulgated a few years
22 ago, we were very critical of that rule because it was
23 so inadequate in achieving the needed greenhouse gas
24 reductions.

25 I will bring to your attention an item from

1 today's news. Do you know when the highest temperature
2 ever recorded averaged over Planet Earth occurred? The
3 answer is yesterday. The record before that was set the
4 day before. The next highest record was the day before
5 that. We've had three days in a row of record-setting
6 temperatures here on Planet Earth, and we need to
7 recognize, as most meteorologists do, that we are
8 approaching a climate crisis.

9 So while we do not oppose the repeal of this
10 rule, we do urge West Virginia DEP to get busy on a rule
11 to regulate greenhouse gas emission from all fossil
12 fuel-fired power plants, not just coal, and that we need
13 to be very proactive in getting West Virginia ready for
14 the need to reduce those greenhouse gas emissions.

15 We would point out that the reductions in
16 those greenhouse gas emissions would also reduce other
17 air pollutants, such as volatile organic compounds,
18 sulfur dioxide, nitrous oxides, particulate matter, et
19 cetera, and would save lives. The failure to act on
20 greenhouse gas emissions will cost West Virginia lives.

21 U.S. EPA had a few weeks ago proposed a new
22 rule to restrict greenhouse gas emissions for all fossil
23 fuel-fired power plants. This would require carbon
24 capture sequestration in some cases. In other cases, it
25 may require the use of alternative fuels such as

1 hydrogen that are not emitting greenhouse gases.

2 It is incumbent upon West Virginia DEP and we
3 urge DEP to use that proposed rule from EPA as a model,
4 promulgate that rule as quickly as possible and give
5 West Virginia's fossil fuel electric-generating units
6 the clear direction they need to get busy on reducing
7 greenhouse gases.

8 It is urgent. It is imperative that you do
9 so. It is one of the things that our future generations
10 will demand of us. We are running out of time and we
11 need to move very quickly on that issue. Thank you.

12 MS. ERNEST: Thank you, James.

13 Next in line is Duane Nichols. Duane, please
14 unmute your mike, clearly state your name and indicate
15 if you're representing any group or organization.

16 MR. NICHOLS: Thank you very much. My name
17 is Duane Nichols, and I'm with the Mon Valley Clean Air
18 Coalition primarily in the Mon Valley here in northern
19 West Virginia, but also of concern with our entire state
20 and with the region that includes Western Pennsylvania
21 and Eastern Ohio.

22 We wish at this time to support the previous
23 comments submitted on behalf of the Sierra Club. We
24 wholeheartedly and fully and strongly endorse these
25 comments and believe that they bring forward a

1 perspective that is beyond the importance that we can
2 make in stating our support from them.

3 And in final conclusion, it's regretful that
4 our members and friends will not have the opportunity in
5 this hearing to send in comments also supporting such
6 strong and important comments as these because these
7 proceedings are coming to a close at this moment. And
8 we request and suggest that this and/or public hearings
9 involve the opportunity for the participants, as well as
10 the general public to be given this chance to comment in
11 writing up to one to two days following the public
12 hearing.

13 That concludes my comments, and I thank you
14 very much for this opportunity to speak on this
15 particular code entry number 44, as well as the entire
16 proposed rule consideration here today. Thank you.

17 MS. ERNEST: Thank you, Duane.

18 There are no other registered commenters. If
19 you did not preregister to speak, but would like to do
20 so, please use the "raise hand" option.

21 Betsy Lawson, please unmute your mike, state
22 your name and if you are associated with any
23 organization.

24 MS. LAWSON: My name is Betsy Lawson. I'm
25 not officially associated with any organization. I

1 would just like to endorse what Jim and Duane have said.
2 I think what they said is very important, and we have to
3 act now. And I hope that the budget for the DEP
4 includes more inspectors so that these new regulations
5 can be properly enforced.

6 Thank you for this opportunity to talk.

7 MS. ERNEST: Thank you, Betsy.

8 Is there anyone else who wishes to make a
9 comment? Please use the "raise hand" feature.

10 (Short pause)

11 MS. ERNEST: There being nothing further,
12 this public hearing for proposed rule 45CSR44 is
13 concluded.

14 There are no further public hearings this
15 evening. Thank you very much for your interest and
16 participation in the public hearings this evening. Have
17 a good night.

18 * * *

19 (Whereupon, this hearing was concluded at 7:31 p.m.)

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1 THE STATE OF :
WEST VIRGINIA : SS: C E R T I F I C A T E
2 COUNTY OF OHIO :

3 I, TAMMIE TRIGG, Registered Professional
Reporter and Notary Public within and for the State of
4 West Virginia, duly commissioned and qualified, do
hereby certify that the proceedings within were by me
5 reduced to stenotype; afterwards reduced to Computer
Aided Transcription under my direction and control; that
6 the foregoing is a true and correct transcription of the
proceedings.
7

8 I do further certify that these proceedings
were taken at the time and place in the foregoing
9 caption specified, and was completed without
adjournment.
10

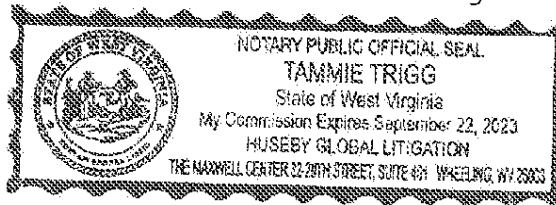
11 I do further certify that I am not a
relative, counsel or attorney of either party, or
12 otherwise interested in the event of this action.

13
14 IN WITNESS THEREOF, I have hereunto set my
hand and affixed my seal of office at Wheeling, West
Virginia, on the _____ day of _____, 2023.

Tammie Trigg

17 TAMMIE TRIGG, Registered
Professional Reporter and
18 Notary Public within and
for the State of West Virginia

20 My commission expires:
21 September 22, 2023



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<p>1</p> <hr/> <p>19 2:22</p> <hr/> <p>2</p> <hr/> <p>2021 2:22,24 2023 2:12</p> <hr/> <p>4</p> <hr/> <p>44 3:3 6:15 45CSR44 2:9</p> <hr/> <p>6</p> <hr/> <p>6th 2:11</p> <hr/> <p>A</p> <hr/> <p>accepted 2:13 ACE 2:21 achieving 3:23 act 4:19 addressed 2:17 adopted 2:20 advance 3:10 Affordable 2:21 air 4:17 5:17 alternative 4:25 and/or 6:8 anyone's 3:10 apologize 3:10 approaching 4:8 attention 3:25 averaged 4:2</p>	<p>B</p> <hr/> <p>behalf 5:23 Betsy 6:21,24 bring 3:25 5:25 busy 4:10 5:6</p> <hr/> <p>C</p> <hr/> <p>call 3:4,7,9,11 called 3:8 capture 4:24 carbon 4:23 cases 4:24 cetera 4:19 chair 3:19 chance 6:10 chapter 3:19 Circuit 2:22 Clean 2:21 5:17 clear 5:6 climate 4:8 close 2:14 6:7 Club 3:19 5:23 coal 4:12 Coal-fired 2:10 Coalition 5:18 code 6:15 comment 6:10 commenter 3:9,12 commenters 6:18 commenting 3:12 comments 2:13, 16,18,25 3:1,3 5:23,25 6:5,6,13</p>	<p>compounds 4:17 concern 5:19 concludes 6:13 conclusion 6:3 consideration 6:16 Control 2:9 cost 4:20 counterpart 2:20 court 2:4 crisis 4:8 critical 3:22</p> <hr/> <p>D</p> <hr/> <p>D.C. 2:22 day 2:11 4:4 days 4:5 6:11 demand 5:10 DEP 4:10 5:2,3 dioxide 4:18 direction 5:6 Duane 3:13 5:13, 17 6:17</p> <hr/> <p>E</p> <hr/> <p>Earth 4:2,6 Eastern 5:21 Electric 2:10 electric-generating 5:5 emission 4:11 emissions 2:10 4:14,16,20,22 emitting 5:1 end 3:9</p>	<p>endorse 5:24 Energy 2:21 entire 5:19 6:15 entirety 2:20 entry 6:15 EPA 2:23 4:21 5:3 ERNEST 3:5 5:12 6:17 Existing 2:10</p> <hr/> <p>F</p> <hr/> <p>failure 4:19 federal 2:20 final 2:5 6:3 floor 2:25 forward 5:25 fossil 4:11,22 5:5 friends 6:4 fuel 5:5 fuel-fired 4:12,23 fuels 4:25 fully 5:24 future 5:9</p> <hr/> <p>G</p> <hr/> <p>gas 2:9 3:23 4:11, 14,16,20,22 gases 5:1,7 general 6:10 Generating 2:11 generations 5:9 give 5:4 greenhouse 2:9 3:23 4:11,14,16,20, 22 5:1,7</p>	<p>group 3:16 5:15</p> <hr/> <p>H</p> <hr/> <p>hand 6:20 hear 3:8 hearing 2:5,8,14 6:5,12 hearings 6:8 highest 4:1,4 hydrogen 5:1</p> <hr/> <p>I</p> <hr/> <p>imperative 5:8 importance 6:1 important 6:6 inadequate 3:23 included 2:16 includes 5:20 incorrectly 3:11 incumbent 5:2 involve 6:9 issue 5:11 item 3:25</p> <hr/> <p>J</p> <hr/> <p>James 3:13,15,18 5:12 January 2:22 JENNINGS 2:4,7 July 2:12</p> <hr/> <p>K</p> <hr/> <p>Kotcon 3:13,18</p>
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<p style="text-align: center;">L</p> <hr/> <p>Laura 3:5 Lawson 6:21,24 legislative 2:9 limit 3:1 lives 4:19,20</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>made 2:14 make 6:2 matter 4:18 members 6:4 meteorologists 4:7 mike 5:14 6:21 minutes 3:2 model 5:3 moment 6:7 Mon 5:17,18 move 5:11</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>names 3:11 necessarily 3:20 needed 3:23 news 4:1 Nichols 3:14 5:13, 16,17 Nicole 3:2 nitrous 4:18 northern 5:18 number 6:15</p>	<p style="text-align: center;">O</p> <hr/> <p>occurred 4:2 officially 6:25 Ohio 5:21 open 2:25 opportunity 6:4,9, 14 oppose 3:20 4:9 option 6:20 Oral 2:13 order 2:11 organic 4:17 organization 3:17 5:15 6:23,25 oxides 4:18</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>part 2:14,17 participants 6:9 particulate 4:18 Pennsylvania 5:20 person 3:11 perspective 6:1 Planet 4:2,6 plants 4:12,23 point 4:15 pollutants 4:17 power 4:12,23 preregister 6:19 preregistered 3:2, 6 previous 5:22 primarily 5:18</p>	<p>proactive 4:13 proceed 2:5 3:8 proceedings 6:7 promulgate 5:4 promulgated 2:23 3:21 pronounce 3:10 proposed 2:8,19 3:3 4:21 5:3 6:16 provide 3:3 public 2:8 6:8,10, 11</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>question 2:15,17 quickly 5:4,11</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>raise 6:20 ready 2:4 3:12 4:13 recall 3:21 recognize 4:7 record 2:15,18 4:3, 4 record-setting 4:5 recorded 4:2 reduce 4:14,16 reducing 5:6 reductions 3:24 4:15 region 5:20 registered 6:18 regretful 6:3 regulate 4:11</p>	<p>regulation 2:21 remanded 2:23 reminder 3:1 repeal 2:19 3:3,20 4:9 reporter 2:4,6 representing 3:16 5:15 request 6:8 require 4:23,25 response 2:18 restrict 4:22 revisions 2:15 row 4:5 rule 2:9,16,19,21, 23 3:3,20,22 4:10, 22 5:3,4 6:16 rulemaking 2:15, 18 running 5:10</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>save 4:19 send 6:5 sequestration 4:24 session 2:24 set 4:3 Sierra 3:19 5:23 speak 3:6 6:14,19 state 3:15 5:14,19 6:21 stating 6:2 strong 6:6 strongly 5:24 submitted 5:23</p>	<p>suggest 6:8 sulfur 4:18 support 5:22 6:2 supporting 6:5</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>temperature 4:1 temperatures 4:6 testimony 2:13 things 5:9 time 5:10,22 today 6:16 today's 4:1 topic 3:1</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>U.S. 2:23 4:21 units 2:11 5:5 unmute 3:4,7 5:14 6:21 urge 4:10 5:3 urgent 5:8 Utility 2:10</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>vacated 2:22 Valley 5:17,18 Virginia 3:19 4:10, 13,20 5:2,19 Virginia's 5:5 virtual 2:8 volatile 4:17</p>
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