

Comments of FirstEnergy Corp.

Mid-Atlantic/Northeast Visibility Union Regional Haze Program Stakeholder Review Meeting

September 19, 2001

FirstEnergy Corp. (FE) welcomes the opportunity to make these comments today. The issue of regional haze in the Northeast is an important issue both environmentally and economically. Reasoned and thoughtful solutions to the regional haze issue in the Northeast, using the best science available and under the established guidelines, is essential.

FE supports the purpose of the meeting. We agree that stakeholder input is an essential part of any air quality planning process. For this reason we are deeply concerned that several of the reference documents here today have been finalized without affording adequate public review and comment. The lack of industry input has led to proposals which are not only very costly, but which also have the consequence of leading to the elimination of needed electric generating capacity.

In particular, the recent report prepared by NESCAUM entitled "A Basis for control of BART-Eligible Sources" is particularly problematic. The report suggests that BART should be specified for all major stationary sources in 29-state region with reduction levels of SO₂ and NO_x of 95% and 94%, respectively. These reduction levels are extremely high -- especially with regard to NO_x -- and extremely costly. Such levels would cause the premature shutdown of most small and medium sized coal-fired power plants, as such expenditures could not be warranted with the limited capital available to utilities. The implications of this potential loss of generation are severe. In regions that are already short of an adequate supply margin, power shortages like what has been experienced in California are possible, even likely. Additionally, the loss of coal capacity would place demands for new generation that would be fired on oil and natural gas. Coal in the U.S. is our nation's most abundant energy resource. Natural gas, on the other hand is in short supply, in a relative sense, and the infrastructure is not in place that would allow wide spread use of this fuel. Oil is a resource that would be largely imported placing a greater dependence on other nations to provide this energy resource in adequate quantities and at a reasonable price. Depending on other nations threatens our nation economically as well as our country's national security.

BART should be determined as Congress has intended under Section 169 A of the Clean Air Act, contemplating a case-by-case analysis including such things as cost, as well as the useful remaining life of the units. The NESCAUM report contemplates no such consideration — just across the board emission controls over a wide region.

Much of the NESCAUM report discusses the techniques used for identifying source regions and back-trajectory analyses are described as a principal tool. Back –Trajectory (B-T) analyses however, say nothing of source attribution and can be very misleading,

even if one assumes they can adequately define the complex three-dimensional flow pattern over some previous period. First, there are a number of B-Ts in existence – each with strengths and weaknesses. Depending on the one chosen, dramatic differences in where the air flow originated can be realized. Second, they cannot account for deposition (wet or dry) that occurs en-route or for any chemical transformations. Only through detailed numerical modeling can the physical, chemical, and dynamical nature of the atmosphere be adequately characterized. And finally, B-T techniques say nothing of which sources or source regions may be responsible. For example, how can a B-T, which may show the air to have passed over the mid-west, be at all illuminating or instructive if it traverses other (closer) sources (like area source emissions) such as one would experience from urbanized areas along its path. In fact, urban source plumes are likely the principal reason for deteriorated air quality and regional haze in Northeastern Class 1 areas.

FE is a diversified energy services holding company headquartered in Akron, Ohio. Its electric utility operating companies - Ohio Edison Company, Pennsylvania Power Company, The Illuminating Company and Toledo Edison Company - comprise the nation's 10th largest investor-owned electric system, serving 2.2 million customers within 13,200 square miles of northern and central Ohio and western Pennsylvania.

FE also provides natural gas service to approximately 50,000 customers in the Midwest and is involved in the exploration and production of oil and natural gas, and the transmission and marketing of natural gas, with resources that include:

- Interests in more than 7,700 oil and gas wells
- Oil and natural gas drilling rights to nearly one million acres in the Appalachian Basin
- Proved reserves of 450 billion cubic feet equivalent of natural gas and oil - about 90 percent natural gas
- Approximately 5,000 miles of pipelines

The company owns 16 electric generating plants in Northern and Central Ohio and Western Pennsylvania. FE has 8,700 miles of transmission lines and 56,000 miles of distribution lines. 10,000 employees in its electricity business and 3,400 employees in oil, natural gas, and mechanical contracting businesses support the company's operations.

FE appreciates the opportunity to make these comments and encourages MANE-VU to seek expanded future stakeholder input in all meetings and reference document preparation.