



November 20, 2013

RE: HB 1699 and the regulation of emissions from diesel generators

Dear Chairman Miller and Committee Members:

Thank you for your consideration of HB 1699, introduced by Representative Ross. While Sierra Club supports Demand Response (DR) programs as a way to lower energy costs and improve grid reliability while avoiding the need for construction of new conventional generation capacity, we have serious concerns about the use of uncontrolled diesel generators in DR programs.

The Sierra Club supports the strongest possible emissions standards on diesel generation units that are used in any DR program. The Sierra Club participated in the US EPA's "RICE NESHAP" rulemaking and was disappointed when EPA chose to exempt diesel units that operate less than 100 hours per year, despite a notable lack of data about the location and emissions of these units. These units may contribute only a small percentage of the overall electric sector emissions on an annual basis. However, the emissions rates, locations, and patterns of usage of these units make them problematic.

Uncontrolled diesel generators emit four times the NOx (an ozone precursor) and three times the fine particulates as conventional fossil generating units per unit of energy. Even though they run much less frequently, they are called upon to operate through DR programs on the days that demand for electricity is highest. These are usually the days when temperature is highest, and temperature is also highly correlated with ground-level ozone levels, which trigger air quality alerts. So these units, which are close to the ground and often in urban environments, are emitting very high rates of ozone-forming pollution at precisely the times and locations when the ozone problems have the most serious impacts on human health. This can result in higher asthma rates, increased hospitalizations for people with respiratory problems, and even premature death.

It is for these reasons that we support the effort to strictly regulate these diesel generators.

Respectfully,

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