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November 3, 2010

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Mr. Rick Barrett
Air Permits Section (6PD-R)
Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
Barrett.richard@epa.gov

Re: Request for Extension of Comment Period;
Approval and Promulgation of Implementation Plans; Texas; Revisions to Rules and
Regulations for Control of Air Pollution; Permitting of Grandfathered and Electing Electric
Generating Facilities
(Docket EPA -R06-OAR-2005-TR-0031)

Dear Mr. Barrett:

The Association of Electric Companies of Texas (AECT) is a trade association representing electric companies in Texas. Our members serve over half of the customers in the state and generate a majority of the electricity generated in Texas. This letter is in behalf of the following members of AECT: AEP Swepco; AEP Texas; CenerPoint Energy; El Paso Electric; Entergy; Luminant; NRG Texas; Oncor; PNM Resources; Reliant Energy; TXU Energy and Xcel.

On October 19, 2010, EPA Region 6 proposed to partially approve and partially disapprove a Texas State Implementation Plan ("SIP") revision that implements a mandate from the Texas Legislature that has already achieved reductions in NO_x and SO₂ in Texas. 75 Fed. Reg. 24235 (Oct. 19, 2010). EPA proposes to partially disapprove one integral portion of the proposed revision, despite expressly stating that the portion at issue does not interfere with attainment or maintenance of the relevant NAAQS, nor cause or contribute to any increase in PSD increments. *Id.* at 64,238 and 64,240.

AECT requests an extension of the comment period for EPA's proposal by at least 30 days to allow AECT companies to thoroughly review the proposal and to provide meaningful comments to the agency. This SIP revision was submitted to EPA over ten years ago. EPA's October 2010 proposal is the first mention of the agency's intention to disapprove any of the proposed SIP revision. In light of the length of time it took EPA to review the pending revision and because of the importance of this rule as applied to AECT companies and other sources in Texas, AECT believes that a 30-day extension is more than reasonable. Allowing this limited additional time will not prejudice any party interested in the proposal, nor should it unreasonably delay EPA's issuance of its final decision, and it should improve the decision-making process by allowing for more thoughtful participation in this process by interested persons.

Please notify me directly of your decision on this request and do not hesitate to contact me if you have any questions.

Very truly yours,

John W. Fainter
CEO and President
Association of Electric Companies of Texas

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Member Companies

AEP SWEPKO

AEP Texas

CenterPoint Energy

El Paso Electric Company

Entergy Texas

Exelon Generation

Luminant

NRG Texas

Oncor

PNM Resources

Reliant Energy

TXU Energy

Xcel Energy