

July 9, 2020

Missouri Department of Natural Resources
Attn: Carol Comer, Director
PO Box 176; 1101 Riverside Drive
Jefferson City, MO 65102-0176

RE: Missouri Department of Natural Resources Air Fee Proposal

Dear Director Comer,

We support the proposed increase to the emission fee per ton presented during the May 28, 2020 stakeholder meeting.

We are appreciative of the opportunity to attend and participate during the air fee stakeholder meetings held over the past several months. The meetings provided significant detail and provided stakeholders with adequate and pertinent information, enabling the group to understand the financial situation of the Air Pollution Control Program (APCP). The stakeholder meetings provided ample time for both discussion and question and answer session.

The information presented during the May 28th stakeholder meeting provided a clear and agreeable plan to increase fees over the next several years to an amount similar to the federal fee structure. The emission fee amount of \$53.00 per ton for 2021 and \$55.00 per ton thereafter is an appropriate short-term effort to resolve the current and impending budget shortfall. We agree it is necessary to continue the discussion over the next several years to monitor budgetary changes and consider long-term solutions to fund the APCP.

We realize and benefit from the efficient and professional services provided by the staff serving in the Air Program. As stakeholders and program fee payers, we have a common interest in receiving fast and implementable permits and maintaining adequate and professional APCP staff that provide reliable compliance assistance when needed.

We very much appreciate the efforts of the APCP to inform industry stakeholders of the current budgetary concerns and to provide open and transparent opportunities to discuss solutions that safeguard essential services benefiting the industry and the entire State of Missouri.

Sincerely,

Missouri Public Utility Alliance

Ameren Missouri

Evergy

Associated Electric

Empire District – A Liberty Utilities Company

REGFORM

City Utilities of Springfield

Sikeston BMU

Independence Power & Light

ELANTAS PDG, INC.

Valley Minerals, LLC

Continental Cement

cc: Darcy Bybee, Director, Air Pollution Control Program
Kyra Moore, Deputy Director, Division of Environmental Quality
Richard Rocha, Chairman, Missouri Air Conservation Commission
Warren Wood, Vice President, Ameren Missouri
Geoffrey Greene, Senior Director, Evergy
Brent Ross, EHS Manager, Associated Electric Cooperative, Inc.
Jeff Burkett, Empire District – Liberty Utilities
Roger Walker, Executive Director, REGFORM
Dan Hedrick, Director, City Utilities of Springfield
Rick Landers, General Manager, Sikeston BMU
Eric Holder, EHS Supervisor, Independence Power & Light
Todd Thomas, Manager of Regulatory Affairs, ELANTAS PDG, INC.
Ed Banfield, President, Valley Minerals, LLC
Robert Budnik, Environmental Manager, Continental Cement