

December 15, 2015



North Dakota Department of Health
Division of Air Quality
918 E Divide Ave
Bismarck, ND 58501-1947

Submitted Via Email: airquality@nd.gov

Dear Mr. O'Clair:

The North Dakota Alliance for Renewable Energy (NDARE) appreciates the opportunity to provide written comments to your agency regarding the development of a state plan under the federal Environmental Protection Agency's Clean Power Plan.

NDARE is a diverse member organization that fosters the development and use of renewable energy and energy efficiency through education, outreach and public policy advocacy. The submittal of this comment letter is not meant to convey support for the Clean Power Plan.

Per the information provided in the Department of Health's Public Notice and on your website, NDARE offers the following general written comments.

At the outset, NDARE supports the "all of the above" energy strategy and vision held by many state policymakers and officials. NDARE recognizes that no one energy source is the "silver bullet" for our state or country.

NDARE believes that it is paramount that energy policies and programs first ensure accessibility, reliability and affordability for energy consumers. The state plan submittal for the Clean Power Plan should reflect these priorities and the priorities should guide the development of a state plan.

NDARE urges the state of North Dakota to submit a state plan under the EPA guidelines for the Clean Power Plan. We encourage the State to submit an initial filing in September 2016 and to also request an extension for final state plan submission until September 2018. In addition, we urge the State to consider a "trading-ready" approach in order to provide affected units as many options as possible for trading either tons or emission rate credits (ERCs) to achieve compliance in the most cost-effective way.

NDARE also urges the state to signal to EPA their intent to utilize the Clean Energy Incentive Program (CEIP) in the September 2016 filing. The CEIP program is voluntary, but allows states the opportunity to capitalize on wind and solar projects in the early years (2021-2022) of the Clean Power Plan. The CEIP will also allow for the development and deployment of energy efficiency programs aimed at low-income populations.

As noted in EPA's "State at a Glance" publication for North Dakota, demand-side energy efficiency may be one of the least-cost, most effective ways to meet North Dakota's compliance goals under the Clean Power Plan. As North Dakota reviews modeling data and other analytical information in the formulation of the state plan, we encourage the State to thoughtfully consider the inclusion of demand side energy efficiency programs as one of the ways to achieve compliance under the Clean Power Plan.

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The North Dakota Alliance for Renewable Energy stands ready to work with the North Dakota Department of Health, affected stakeholders and other interested parties to ensure that North Dakota's path to compliance under the Clean Power Plan ensures access, reliability and low costs for North Dakota energy consumers.

Sincerely,

North Dakota Alliance for Renewable Energy Board of Directors

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