# CARBON POLLUTION EMISSION GUIDELINES FOR EXISTING STATIONARY SOURCES: ELECTRIC UTILITY GENERATING UNITS

## Docket No. EPA–HQ–OAR–2013–0602

## Proposal Re: Treatment of Electricity Generation Imported from Canada

### 1. Modification to existing language in the preamble to the proposed rule

*(The highlighted redlined text below represents suggested modifications to policy language in the preamble to the proposed rule.  This language is excerpted from a section in which EPA discusses considerations for State Implementation Plans – namely, the treatment of interstate effects and accounting for interstate renewable energy trade.  The citation for this language is 79 Fed. Reg. at 34922).*

The EPA is proposing that, for renewable energy measures, consistent with existing state RPS policies, a state could take into account all of the $CO_2$ emission reductions from renewable energy measures implemented by the state, whether they occur in the **state, other states, or in Canada.**  This proposed approach for RE acknowledges the existence of renewable energy certificates (REC) that allow for interstate trading of RE attributes and the fact that a given state's RPS requirements often allow for the use of qualifying RE located in another **jurisdiction** to be used to comply with that state's RPS.

### 2. Additional language in the preamble to the proposed rule

*(The text below represents additional language proposed for inclusion in the preamble).*

With respect to zero-emitting generation imported from Canada, states may account for $CO_2$ emission reductions in a manner that is consistent with intra-state and inter-state accounting, including provisions, where applicable, to account for double counting.  For example, tracking and accounting for ownership of environmental attributes for renewable energy imported from Canada may be facilitated through participation in a renewable energy tracking system, a power purchase agreement, a carbon crediting program or an administrative adjustment.