

## **NRECA ISSUES FOR INTERAGENCY REVIEW ON 111(d)**

Question: How does the proposed guidance ensure the states will set emission limitations that are reasonably and realistically achievable and set on individual unit by unit basis (“inside the fence”)?

Question: How will the guidelines be crafted to avoid putting not-for-profit co-ops (small utilities) at a competitive disadvantage?

Question: How can this proposal be crafted to avoid jeopardizing the ability of co-ops to meet their loan obligations?