

Wisconsin's Top 5 Priorities/Issues/Concerns
Energy-Producing States Summit
April 16-17, 2014

- EPA overstates the present viability of carbon capture and sequestration (CCS). CCS is neither a proven nor viable option for some states (such as Wisconsin) and therefore should not be considered either when setting the standard or as a compliance mechanism. If it is considered, there must be consideration for any additional cost to states that do not have in-state capabilities.
- Existing state and local energy efficiency (EE) and renewable energy (RE) programs should be recognized by EPA for their GHG reduction benefits. EPA should consider these programs as a pathway to compliance.
- EPA should consider the progress states have made to date in reducing CO2 emissions from the power sector.
- The 111(d) GHG standard should not apply to biomass fuels in any combination with fossil fuels. Biomass should instead be credited in meeting any fossil fuel CO2 standard.
- The 111(d) regulations should take into account the different makeup of existing fossil fuel generation in each state and provide compliance pathways or mechanisms that recognize such state variations and the different levels of effort that may be required.