

ES-10 Comments
Recommendation 22
Generation performance standards or GHG mitigation requirements for new (and/or existing) generation facilities, with/without GHG offsets

The economic impacts of any legislation must be determined and be a part of the decision.

Government meddling/incentives rarely result in progress. Montana should be working to remove barriers to progress not impeding them by adding bureaucracy that adds no value to the end product. Furthermore, this report was based on a politically correct directive which assumes there is a man-made climate crisis. While this assumption has the backing of the media and politicians it has little support from the scientific community. Hence the reporting by the media of the relative minority that support the theory. Technology should be able to stand on its own merits without government incentives. Regulation based on politics not science.

Why by 2010? The national government should control these standards so that Montana is able to compete in a national market.

Not wise since we are struggling now to replace Bonneville power.

Montana should not be out in front in setting greenhouse gas emission standards. Such an effort will result in higher energy costs to Montana consumers.

There should be a cost/benefit analysis required. The benefits do not justify the costs using sound science. More taxes, regulations and red tape is not what will help Montana.

The concept sounds good, but the bulk of Montana's GHG emissions come from a few places. Have you evaluated economic impacts. Grandfathering? Many issues to consider.

Montana should follow, not lead

Wording unclear

Excellent. Governments first role is to set high quality standards, timelines and enforcement. Incentives after that may include developing development partnerships and funding mechanisms and benefits.

Only if applied to new facilities

No! No! No! Let the nation speak with one voice - let the feds lead.

Only if this means staying out of the market and removing subsidies for bad behavior.

Are you serious? How many combined cycle natural gas power plants are in Montana? None, Oh one on the drawing board. Have you thought about the increase in price to consumers to heat their houses because of the demand for natural gas for the CT?

Long overdue

Excellent recommendation.

Okay, but I do not support large-scale industrial-style corporate wind farms and their accompanying transmission lines! Small distributed alternative energy systems, especially rooftop solar, have less impact on landscapes and provide plenty of jobs!

We can't even do it yet!
individuals can only do so much with this issue, we need strong and numerous government action of many forms and formats...

This could have huge consequences to the competitiveness of existing facilities if the same standards are not adopted nationally.

Look to the UN-intended consequences. Let the market do its job. Like most government involvement in an issue, it is well intentioned, but will ultimately make the situation more cumbersome and expensive.

Yes. And let that standard be zero.

OK. I agree that sequestered CO2 should not be counted as emissions.

With emphasis on renewable not coal.

Imported electricity? Isn't Montana an exporter, generating more electricity than we need?

The sooner the better

Same as above.

High user costs.

Why would we create another competitive disadvantage for power produced in Montana? Wouldn't this extra standard make electricity more expensive for Montana consumers?

Yes. Regulate new producer plants -- but how much better to eliminate the need for them entirely by developing on-site residential/commercial production. Extend the life of the grid we have by shifting satisfying of any new power demand to the (not-for-profit) end consumer rather than the (for-profit) producer.

this is arbitrary. everyone would come up with different standards. terrible idea.

Sounds like California.

We need to make progress on existing power plants, which currently have little incentive to improve on grandfathered emissions limits.

This needs to be done on uniform national basis if it is done. To do so state by state will create a patchwork of compliance that will be unnecessarily costly and drive production out of this state to our disadvantage. We don't need to make Montana-produced power more expensive than it already is.

Again, when China and eastern Europe bother!!!

NO.

this is an absolute must

Not sure I understand

Restricting out of state-trying to govern may be unlawful-restraint of trade and may not do anything but drive up costs for Montana consumers.
ESSENTIAL! as we are an exporter.

Need to provide incentives for generators to change along with the regulations.

Totally impractical.

Studies show that there is zero climate benefit to such investments. Clearly there is no consensus on any benefit to GHG reduction. CO2 is too small in % of atmosphere to drive climate.

No. Emission performance standards such as this increase the cost of electricity to Montana consumers.

Sounds good.

Make sure the standard is stringent.

A standard could be supported if it did not place Montana in a competitive disadvantage.

This is not supported by science

Make standards stringent

This recommendation will increase costs to the consumer...NO

What is the costs? Has the cost been communicated to the consumer? How was the level of the emissions set? Is the emission standard achievable with proven today's technology?

Total waste of time and money. Will destroy our economy and raise prices. Standard of living in the US will deteriorate.

I don't believe this is necessary at this time.

Natural gas should be used for heating buildings not generating electricity. There is a limited supply. Use coal, we only have 3,000 years worth in Montana.

This is essentially DEQ for industry (As opposed to vehicular traffic) and always results in truly innovative products not being marketable due to bureaucratic mismanagement/silly-ness.
build more dams ,there is no greenhouse gases

And the cost gets passed on to either the consumers or the taxpayers yet again.

again I'm concerned about energy that is exported, at MT residents expense.

not imported

You are trying to make it virtually impossible for any new plants to be built and if they are, they will be so expensive that they will fail.

This Action Plan was not a Montana grassroots Plan. It was the same plan written for California and other states. I do not support anything in this section. Montana's poor and middle class cannot pay any more for energy.

<http://www.righttalk.com/asx/ggws.aspx>

Unfunded mandate! costing the citizens of Montana.

By 2010 the Hoax of Human Cause Global Warming will be fully realized I hope, but again the state will set a standard for industry that only industry has a right to set. What happens if the standard the state set are not met, the facility will be fined, part of the cost of doing business, will be passed on to consumers. Or government will come in and "take" the business and in the end will make it less efficient because that is what tends to happen when government who has never be concerned about efficiency and profit tries to run business. ie. Social Security. There are all kind of retirement funds run by various business that are actually making money for the investor as well as themselves not so Social Security.

Again, the increased cost goes to the consumer

educate, do research and development and let us make choices

NO NO NO AND NO

Cost?

should outlaw the use of natural gas to generate electricty.

I like this for new facilities. We want to be careful not to push natural gas only. Montana has significant coal reserves that can benefit Montanans and its economy. I would like to hope that we can find a way to use that natural resource and still achieve some GHG reduction. Lets not set a standard that would prohibit responsible coal development in Montana. I would like for my children to have job opportunities in Montana.

???This can't be realistic.

Grandfather existing plants to allow for reasonable rates to be maintained for Montana citizens

This is an international, and maybe a national issue

There is no proof carbon emissions increase global climate, so do not regulate it.

Come on! This basically says no new generation in Montana, no new jobs, please just give our kids bus fare to Wyoming.

NO. NO, NO.

This would be very costly to all of us.

If they want to use coal there should be substantial mitigations!

Too much government intervention. Would place Montana companyies at a disadvantage in the market and would significantly increase costs to customers.

This will drastically increase the cost of power for Montanans.

raise costs of production

Absolutely not. Junk science driven legislation is absurd.

There needs to be a moratorium on coal fired power plants.

GHG standard should be better than this.

No relevant scientific basis has been established linking greenhouse gases to variations in temperatures. Provide valid empirical data that proves the causal link between greenhouse gases and temperature variations BEFORE passing laws.

Again, this is a false crisis. This whole thing should be scrapped.

No economical, existing CO2 capture and sequestration technology.

Where's the technology??? You're way ahead of what can be done affordably. The current costs of trying to capture and sequester GHG are huge and if implementation is forced, will irreparable harm society as we know it today.

I don't see how the State of Montana can dictate GHG standards for generators delivering power to Montana from out of the State

Better for Montana to follow national standards.

Set them as to not allow any GHG.

More government interference

Standards based on who's set of figures?

Montana should not be considering emission performance standards. This could really hurt Montana consumers of electricity through higher costs.

Should be a federal issue.

Scientific theories on global warming do not warrant new taxes or legislation. Need additional analysis to understand impact on consumers and penalties on business development.

We can forget performance standards for greenhouse gases, if we go with green energy sources.

This will only drive up the cost of energy.

We have concerns over facility based standards based on technology that is not yet available commercially. Furthermore, making across the board standards does not take into consideration that some providers may not have a wide variety of options for source generation, thus placing these providers in an uncompetitive situation. This recommendation has the potential to make providers in Montana, non-competitive with other states causing a chain reaction that does the same for other industrial customers.

Can you really prove that CO2 is the total problem? I don't believe you have total hard evidence. Stupid costly idea.

The offsets would have to be vetted to be certain that actual reductions are being made otherwise this is a waste of time and money. In reality offsets should be a distant plan b.

This will lead to government dictating the treatment of a business employee. Government will dictate what you can and cannot do between you and your employee. An employer will become nothing more than a pawn in the hands of government.

Do not grandfather in old electricity plants that produce GHG.

The State should not get mixed up in the "Greenhouse gas" farce.

seems like we shouldn't need to import.

There goes my electric bill!

All of these are 'feel good' expensive bulls**t legislation. Global warming is NOT a fact (cold records set last winter in the southern hemisphere) so it might be Northern hemisphere warming, but not global. Secondly, latest studies of the sun spots (that control global temperatures more than humans) indicate that within 20 years we will be back in a 'mini-ice age'. Not politically correct, but MUCH more accurate.

This proposal would add to the cost of electricity for Montana residential and business consumers. Montana government should not be imposing requirements that add to our cost of living.

Who is going to be able to pay the price

ONLY to the point of feasible existing technology

Greenhouse gas is a creation of over active minds.

There we go. Right out socialism. Congratulations.

This could make MT a stand out state and uncompetitive nationally without economic benefits.

what kind of power do you think you really have to dictate to a provider what happens in another state or country? what is the methane release at a sizable dairy farm or feed lot?

Especially imported.

Who is going to pay for it?

If outside sources do not meet goals and we cut them off, nobody will be able to afford power!!

Electricity that leaves the state should have a severance and carbon tax.

cost? who will pay?

Too technical -- don't understand it. WHO THE HECK WROTE THIS SURVEY? There are companies and writers who know how to take technical information and make it accessible to layman. You very obviously did not do this. I CONSIDER IT A SIGN OF DISRESPECT FOR THE PEOPLE YOU SUPPOSEDLY SERVE.

how many new power plants will montana be forced to build because of this regulation? will it really help climate change any more than 1 degree over 100 years? Kyoto is a scam to suck money from the first world and put it in third world manufacturing base.

Montana is not an island. Need to stay in competitive position with other states.

Excellent.

Without standards, energy producers will use the cheapest means available to produce energy, there will be no incentive to produce less GHG. The more producers adopt low GHG production methods the more affordable the process will become.

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Hell no. Natural gas is too high a standard and too expensive as it is. Never mind that driving toward natural gas is a completely inappropriate energy for electrical power. Gas is best used directly as a clean heat energy source for uses that would otherwise require emissions controls that would be impractical. Like heating your house with coal? Stupid. Or with coal fired juice? Send gas to its best end use.

If electricity is coming into Montana from a non-compliant facility, what will you do?

Since the reality is that the earth is actually cooling, are you going to attempt to reverse this nonsense 5-years from now when politized science catches up with real science??

Devil's in the details

According to Paul Harvey's comments today, we are now on the down cycle to climate cooling, rather than climate warming. A large number of scientists don't agree that man's emissions are as serious as the global warming activists portray. With Montana's sparse population, I don't think we need stricter standards.

This would put Montana out of business and it is totally unnecessary.

The devil is in the details

Do the people that came up with this just hate consumers or get some thrill out of seeing moderate and low income individual's disposable income evaporate? Existing coal fired would easily see a 4 cent per kwh bump in kwh cost.

The "consensus" that GHG are causing global warming is based on a U.N. Socialist political report and is not based on scientific proof.

Who is going to establish the standard and who wants no power?

If new supply can't meet at least these standards than supply should come from somewhere else.

WHY NOT MAKE IT WIND POWER WITH "NO" GREENHOUSE EMISSION ???

GNP expects that federal legislation to regulate GHG emissions will be passed in the near future and we are developing our business plans accordingly. In the meantime, we believe it would be ill-advised for Montana to adopt GHG emissions regulations in advance of federal legislation. Any regional or Montana-specific regulations would have an infinitesimal impact on global climate change. "Early adoption" of regulations would impose significant costs on Montana businesses and consumers and would send an anti-business message to energy developers driving new projects and related investment to neighboring energy-producing states such as Wyoming and North Dakota.

should be national

Easy to follow other states on this and fall into a trap like they will likely do. Work on CO2 capture and storage technology, so we are ready to implement when national legislation comes.

These standards should be set at a national level so Montana is not disadvantaged.

If we go here alone won't that cause electricity produced in Montana to be priced out of the market in other states? And, even worse, won't that make our electricity higher priced than everywhere else? Do the benefits really outweigh the costs or does it just make us feel good?

define GHG (green house gas?) Not clear on this.

again with teeth. no "volunteer" compliance as adequate.

If you do this, be honest about the increased cost to consumers.

there is climate change. But man's impact is limited. Maybe as little as less than 3-5% need cost benefit analysis

more of the myth dance.

Need a national plan, don't drive out industries to the Dakota or Wyoming. We need the jobs here.

Natural gas fired boilers use a huge amount. So you increase the need for coalbed methane which the environmentalists are against. It also greatly increases my home heating bill. There should be no standard demanding more than reality can accomplish.

Essentially equates to a tax on Montana energy.

GPS will add costs to electricity putting us at a regional disadvantage. Montana should instead follow Federal guidelines.

Power generation is a wasteful use of natural gas.