

* Clean Air Act Regulatory Landscape In 2020

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** Predictions Not Binding!*

* A Brief History

- Revisions to Ozone NAAQS; New PM 2.5 NAAQS
- New Source Review/New Source Performance Standards Litigation
- NOx Trading Program (Eastern United States)
- Regional Haze Regulations

*Leading to New Challenges

- Hazardous Air Pollutants
- Greenhouse Gas Emissions
- Fossil Fuels
- More Cap and Trade?

*What If . . .

. . . Congress amends the CAA?

- * Greenhouse Gas Requirements in CAA?
- * Cap and Trade Program for CO₂?
- * New Cap and Trade Program for SO₂, NO_x?
- * Revisions to Hazardous Air Pollutant Provisions?

***What could happen?**

*Obstacles to Legislation

CAA Complexity

Challenges to Bipartisan Action

Unpopular Idea

*What If . . .

. . . Congress does not act?

- *EPA Rulemakings
- *Conflict Among Requirements for Utilities
(Reliability Requirements/Potential Need
to Install Control Equipment)
- *Uncertainty . . . ?
- *Overlapping Programs

***What could happen?**

***What would be best
for utilities?**

- * Possible piece-by-piece legislation vs. CAA overhaul.
- * EPA continues to test DC Circuit.
- * Some states continue to take action.
- * Some regulation of HAP emissions from utilities.
- * Future of natural gas?

* **Predictions**