



December 7, 2016

Dear Senator:

On behalf of the American Public Power Association, the Edison Electric Institute, and the National Rural Electric Cooperative Association, we are writing to express our strong support for the bipartisan, bicameral coal combustion residuals (CCR) language included in the Water Infrastructure Improvements for the Nation Act (WIIN Act). We have been working closely with the last several Congresses to develop consensus legislation to ensure the responsible disposal of CCR, and we believe the compromise language included in the WIIN Act is essential to help achieve this objective. We urge the Senate to pass the WIIN Act before it adjourns.

The CCR language will help ensure a coherent and consistent implementation of the Environmental Protection Agency's (EPA) CCR rule. EPA currently lacks authority to provide for implementation of the CCR rule through state permit programs. As a result, the CCR rule is self-implementing, there is no state permitting authority to issue permits and oversee compliance, enforcement occurs solely through citizen suits by the state or third-party groups, and EPA has no oversight or enforcement role. The CCR provisions of the WIIN Act address those deficiencies by providing an expeditious path for the establishment of state-based permit programs to oversee implementation of the CCR rule.

Again, we strongly urge you to support the WIIN Act.

Sincerely,

A handwritten signature in black ink that reads "Susan N. Kelly".

Susan N. Kelly  
President & CEO, American Public Power Association

A handwritten signature in black ink that reads "Tom Kuhn".

Thomas R. Kuhn  
President, Edison Electric Institute

A handwritten signature in black ink that reads "Jim Matheson".

Jim Matheson  
Chief Executive Officer, National Rural Electric Cooperative Association