



WEST ASSOCIATES

July 6, 2006

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Arizona
Arizona Electric Power
Cooperative

Arizona Public Service
Company
Salt River Project
Tucson Electric Power Co.

California
Los Angeles Dept. of
Water & Power
Southern California Edison

Colorado
Colorado Springs Utilities
Xcel Energy
Platte River Power
Authority
Tri-State Generation &
Transmission Co.

Idaho
Idaho Power Company

Nevada
Nevada Power Co./
Sierra Pacific Power Co.

New Mexico
Public Service Company of
New Mexico
Xcel Energy
Tri-State Generation &
Transmission Co.

North Dakota
Basin Electric Power

Oregon
PacifiCorp

Utah
PacifiCorp/Utah Power &
Light

Wyoming
Basin Electric
PacifiCorp
Xcel Energy
Tri-State Generation &
Transition

Mr. Don Arbuckle, Deputy Administrator
Office of Information and Regulatory Affairs
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

**RE: Regional Haze Regulations - Revisions to Provisions Governing
Alternatives to Source-Specific Best Available Retrofit Technology
(BART) Determinations**

Dear Mr. Arbuckle:

I am writing on behalf of WEST Associates requesting that the Office of Management and Budget expedite its review of the Regional Haze rules regarding alternatives to source-specific BART under Section 309.

WEST Associates is a regional coalition of public and private electric utilities serving over 16 million customers in the western U.S. WEST Associates' mission is to promote effective regional energy and environmental policies that are based on sound science. WEST Associates played a leadership role in advancing both the science and the public policy to address visibility protection in the western U.S. through its participation in both the Grand Canyon Visibility Transport Commission and the Western Regional Air Partnership.

The uncertainty resulting from the delay in this rule being promulgated is hampering planning efforts in the west. Western States must submit their regional haze SIPs by December, 2007.

States have limited time to complete visibility modeling, develop control strategies, establish trading programs and assess projected visibility improvements prior to preparing their SIPs. A sound and effective visibility program is dependent on completion of this rulemaking.

Again, WEST Associates requests that you take whatever steps needed to move this rulemaking to a rapid conclusion.

Mr. Don Arbuckle, Deputy Administrator

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Should you have questions or need further information, you may contact David Steele at (520) 321-1111.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'C.V. Mathai', with a horizontal line underneath.

C.V. Mathai, Ph. D., President
WEST Associates Board of Directors

CC: Mr. Bill Wehrum, Acting Assistant Administrator for Air and Radiation
Environmental Protection Agency
