June 5, 2014

US EPA
Region 8 Air Program
1595 Wynkoop Street
Denver, CO 80202

RE: Requests for comments for Title V Application for Deseret Power

Dear Sirs:

As a business manager in the Uintah Basin with a degree in Business and Finance, I believe I have a practical understanding of how things work. I also have a history of working with governments and serving on business and community committees including the Uintah Basin Association of Government, Roosevelt Chamber of Commerce and the Roosevelt Rotary Club.

I attended the recent hearing at the Ute Tribal Auditorium concerning the above application and must say, that I was amazed. From the Ute Tribe presentation, it appeared that Deseret Power had received multiple violations with no comments concerning any actions that have taken to resolve these issues. From the Deseret Power side it appears that they are the most dutiful and mindful organization, always going above and beyond to insure all compliance is completed in a exemplary method. Undoubtedly, neither of this view are accurate.

I personally understand the EPA objective to safeguard the environment and insure targeted species are adequately protected. I have observed your action with the Spotted Owl and other animals and know your directives have little concern for local families and businesses.

I could add my voice to those at the hearing citing concerns about the impact of a $200,000 additional to the overhead and equipment to insure that Deseret Power comes into compliance and although I believe that little verifiable evidence exists that Deseret Power is the main contributor to the air quality problems of the Uintah Basin, they undoubtedly have some impact. I believe action should be taken to have them move toward compliance with all federal guidelines. The question is how should this be done and how quickly should this change be put into place.

As I listened to the comments of almost all that presented at the hearing, it appears an "**ALL OR NOTHING"** attitude prevailed. I seldom find this an effective way to accomplish change. This approach

does nothing except cause deep long standing resentments and harsh financial burdens that are difficult to overcome.

On the other hand, a gradual phase in over a period of time can often be accepted and accomplish the same objective. One similar example is the price of gasoline compared to many years ago. I remember the 22 cent oil in Utah while now the price is $3.60. If we had asked the residents of the Utah or the nation to go from 22 cents to $3.60 overnight, it would have been a disaster. (Some calculations of this increase are as high as 1500%.) If this had been attempted in one action, the economy of the nation and the state would have gone into a steep decline with irreparable damage. Instead a more reasonable approach was reached with a gradual increase in pricing over many years. I wonder if this might not work in this situation.

Specific items that need to be upgraded could be listed with a time line of what we need to do each year. These improvements could be monitored along with sampling to insure the desired action obtains the desired results. Instead of a 40% immediate hike in utility rates which would probably cause all oil production and exploration in the Uintah Basin to cease, an increase of 10% could be absorbed with some pain and hard work. (This 40% increase would have a tremendous "trickle down" affect impacting every aspect of business and personal finance. This would include employment, housing and taxes.) Most reasonable people would understand that few if any increases have been awarded during the past many years and some increases could be absorbed if needed. Maybe part of the $200 million could be absorbed by Deseret Power or the related cooperatives, if not they would need to be passed on the subscribers, just like other utilities. By simply spreading the increases out of a number of years, it could be tolerated although painfully.

Thank you for listening to my concerns.

David Higginson
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