

1 **NORTHWEST PUBLIC POWER ASSOCIATION**

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3 **RESOLUTION NO. 07-8**

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5 **SUPPORT OF ALASKA LOW SULFUR FUEL REQUIREMENTS WAIVER**

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7 The Northwest Public Power Association (NWPPA) recognizes that
8 the Alaska Department of Environmental Conservation (ADEC) is
9 working with the Environmental Protection Agency (EPA) in accepting
10 reasonable fuels requirements already mandated for the Lower 48 states.

11 One such requirement would mandate the use by remote electric
12 utilities in Alaska of Ultra Low Sulfur Diesel fuel (ULS)--that diesel fuel
13 having not more than 15 parts per million sulfur content (15ppm). The
14 imposition of this requirement in Alaska is not justified because of the
15 open spaces, absence of dense industrial or transportation base, and
16 lack of spot congestion from fuel systems exhaust as is sometimes found
17 in the rest of the nation.

18 NWPPA encourages the extension of Alaska's long held waiver
19 against the imposition of unnecessary lower sulfur levels in Alaska fuels.
20 There has been a waiver for Alaska of Low Sulfur (below 500ppm) fuel
21 requirements for years for good reasons, including those referenced
22 above. This waiver should be extended to the ULS fuels for the same
23 reasons. Unless the waivers are granted, a catastrophic economic
24 disaster will accompany the required changeover to new tankage,
25 shipping containers, equipment and fuel expenses. The economic
26 repercussions will affect both rural areas and the urban communities
27 that supply and transport the fuels to the remote areas of Alaska.

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30 (Contact: TC Wilson) Changes by Meera Kohler at 3-9-06 GRC meeting