

**From:** Glenn Sliva  
**Sent:** Thursday, April 03, 2014 2:55 PM  
**To:** Joe Thomas  
**Subject:** EBT Stakeholder Group

Joe

My informal comment is short and regarding the 180 day limit to submit an application to generate ERCs and MERCs.

I propose a 5 year look back for a period of 1 year that sunsets to give the ability of owners more time to submit applications that were subject to the 180 day limit.

Several owners have lost the ability to generate because of this narrow short limit.

For example. Beginning July 1, 2014, and back to June 30, 2009, owners may file an application or modify one that was created for lost credits because of the 180 limit.

This look back period would be allowed until July 1, 2015, and subsequently the rule would revert to a 1 year or 365 day limit for look backs or material facility changes thereafter July 1, 2015.

This seems like a reasonable rule change and would not create a large workload increase for the TCEQ staff yet give owners more time to complete an application to generate ERCs/MERCs and the resulting positive impact of reducing emissions of pollutants. A win win for everyone.

Thank you for allowing my input and listening to the voices of EBT stakeholders.

Kindest Regards

Glenn Sliva

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