A Brief History

-- Revisions to Ozone NAAQS; New PM 2.5 NAAQS
-- New Source Review/New Source Performance Standards Litigation
-- NOx Trading Program (Eastern United States)
-- Regional Haze Regulations
Leading to New Challenges

-- Hazardous Air Pollutants
-- Greenhouse Gas Emissions
-- Fossil Fuels
-- More Cap and Trade?
What If . . .

. . . Congress amends the CAA?
* Greenhouse Gas Requirements in CAA?
* Cap and Trade Program for CO2?
* New Cap and Trade Program for SO2, NOx?
* Revisions to Hazardous Air Pollutant Provisions?

*What could happen?
*Obstacles to Legislation*

CAA Complexity
Challenges to Bipartisan Action
Unpopular Idea
What If . . .

. . . Congress does not act?
* EPA Rulemakings
* Conflict Among Requirements for Utilities (Reliability Requirements/Potential Need to Install Control Equipment)
* Uncertainty . . . ?
* Overlapping Programs

**What could happen?**
What would be best for utilities?
* Possible piece-by-piece legislation vs. CAA overhaul.
* EPA continues to test DC Circuit.
* Some states continue to take action.
* Some regulation of HAP emissions from utilities.
* Future of natural gas?

* Predictions