NORTHWEST PUBLIC POWER ASSOCIATION

33-09 ARCHIVED RESOLUTION

SUPPORT OF ALASKA LOW SULFUR FUEL REQUIREMENTS WAIVER

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

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

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

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