

OCT 26 2015

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

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UNITED STATES COURT OF APPEALS
DISTRICT OF COLUMBIA CIRCUIT
FILED
OCT 26 2015
CLERK

LUMINANT GENERATION COMPANY)
LLC, OAK GROVE MANAGEMENT)
COMPANY LLC, BIG BROWN POWER)
COMPANY LLC, SANDOW POWER)
COMPANY LLC, BIG BROWN LIGNITE)
COMPANY LLC, LUMINANT MINING)
COMPANY LLC, and LUMINANT BIG)
BROWN MINING COMPANY LLC)

Petitioners,

v.

UNITED STATES ENVIRONMENTAL)
PROTECTION AGENCY and GINA)
McCARTHY, Administrator, United States)
Environmental Protection Agency)

Respondents.

Case No. 15-1386

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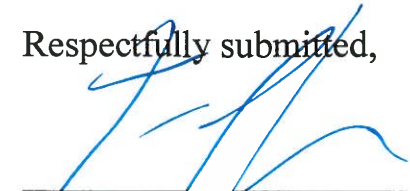
PETITION FOR REVIEW

Pursuant to Federal Rule of Appellate Procedure 15 and section 307(b) of the Clean Air Act, 42 U.S.C. § 7607(b), Luminant Generation Company LLC, Oak Grove Management Company LLC, Big Brown Power Company LLC, Sandow Power Company LLC, Big Brown Lignite Company LLC, Luminant Mining Company LLC, and Luminant Big Brown Mining Company LLC (collectively, “Luminant Petitioners”) file this petition for review of the U.S. Environmental Protection Agency’s (“EPA”) final rule entitled *Carbon Pollution Emission*

Guidelines for Existing Sources: Electric Generating Units and issued on October 23, 2015 (“Final Rule”). See 80 Fed. Reg. 64,662 (October 23, 2015).

Dated: October 26, 2015

Respectfully submitted,



Counsel for Petitioners

Counsel for Petitioners:

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Environmental Protection Agency)

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Case No. 15-1386

RULE 26.1 CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and Circuit Rule 26.1, Petitioners Luminant Generation Company LLC et al., submit the following corporate disclosure statement:

Luminant Generation Company LLC (“Luminant”), a Texas limited liability company, is the legal entity that owns numerous Luminant generation facilities and assets associated with Luminant’s competitive power generation business in the State of Texas. Oak Grove Management Company LLC (“Oak Grove”), a

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Delaware limited liability company, is the legal entity that owns Oak Grove Power Plant in Robertson County, Texas. Big Brown Power Company LLC (“Big Brown”), a Texas limited liability company, is the legal entity that owns Big Brown Power Plant in Freestone County, Texas. Sandow Power Company LLC (“SPC”), a Texas limited liability company, is the legal entity that owns Sandow Unit 5 Power Plant in Milam, Lee, and Bastrop Counties, Texas. Big Brown Lignite Company LLC (“Big Brown Lignite”), a Texas limited liability company, is the legal entity that owns the lignite reserves associated with the Big Brown Power Plant. Luminant Mining Company LLC (“Luminant Mining”), a Texas limited liability company, is the legal entity that owns the mine assets utilized in connection with mining lignite used to fuel the Monticello Power Plant and the Martin Lake Power Plant as well as certain mine assets utilized in connection with mining lignite used to fuel the Sandow 4 Power Plant and the Sandow 5 Power Plant. Luminant Big Brown Mining Company LLC (“Luminant Big Brown”), a Texas limited liability company, is the legal entity that owns the mine assets utilized in connection with mining lignite used to fuel the Big Brown Power Plant.

Luminant, Oak Grove, Big Brown, SPC, Big Brown Lignite, Luminant Mining, and Luminant Big Brown are wholly owned subsidiaries of Luminant Holding Company LLC, which is a Delaware limited liability company and is a wholly owned subsidiary of Texas Competitive Electric Holdings Company LLC

(“TCEH”). TCEH is a Delaware limited liability company and is a wholly owned subsidiary of Energy Future Competitive Holdings Company (“EFCH”), which is a Texas corporation and a wholly owned subsidiary of Energy Future Holdings Corp. (“EFH Corp.”). Substantially all of the common stock of EFH Corp., a Texas corporation, is owned by Texas Energy Future Holdings Limited Partnership, which is a privately held limited partnership. No publicly held entities have a 10% or greater equity ownership interest in EFH Corp.

Dated: October 26, 2015

Respectfully submitted,



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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Appellate Procedure 15(c), I hereby certify that I have this day caused the foregoing Petition for Review and Rule 26.1 Certificate of Corporate Disclosure to be served by first-class mail, postage prepaid, on October 26, 2015, upon the following:

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Dated: October 26, 2015



Counsel for Petitioners