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

INTERNATIONAL)
BROTHERHOOD OF ELECTRICAL)
WORKERS, AFL-CIO)
)
Petitioner,)
)
vs.)
)
UNITED STATES)
ENVIRONMENTAL)
PROTECTION AGENCY)
)
Respondent)

No. 15-1410

ORIGINAL

PETITION FOR REVIEW

International Brotherhood of Electrical Workers, AFL-CIO, hereby petitions this Court, pursuant to Rule 15 of the Federal Rules of Appellate Procedure and Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1), to review the final agency action by respondent United States Environmental Protection Agency entitled "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units" published in the Federal Register at 80 Fed. Reg. 64,662 on October 23, 2015.

This Court has jurisdiction and is a proper venue for this action pursuant to section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1) (2006 & Supp. V 2011).

Respectfully submitted on this 5th day of November, 2015.

A handwritten signature in black ink, appearing to read "E. Trisko". The signature is fluid and cursive, with a large initial "E" and a long, sweeping tail.

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Counsel for Petitioner

**RULE 26.1 CORPORATE DISCLOSURE STATEMENT OF
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure (“FRAP”) and Rule 26.1 of the Local Rules of this Court, the International Brotherhood of Electrical Workers, AFL-CIO (“IBEW”) hereby states:

- 1) IBEW is a non-profit national labor organization with headquarters located at 900 7th Street, N.W., Washington, D.C. 20001;
- 2) IBEW's members are active and retired skilled electricians and related professionals engaged in a broad array of U.S. industries, including the electrical utility, coal mining, and railroad transportation sectors that stand to be impacted adversely by implementation of EPA’s final agency action;
- 3) IBEW provides collective bargaining representation and other membership services and benefits on behalf of its members;
- 4) IBEW is affiliated with the American Federation of Labor-Congress of Industrial Organizations;
- 5) IBEW has no parent companies, subsidiaries, or affiliates that have issued shares or debt securities to the public.

Respectfully submitted this 5th day of November, 2015.

A handwritten signature in black ink, appearing to read "E. M. Trisko". The signature is fluid and cursive, with a large loop at the beginning of the first name.

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Counsel for Petitioner

CERTIFICATE OF SERVICE

I, Eugene M. Trisko, Counsel for the International Brotherhood of Electrical Workers, AFL-CIO, hereby certify that on this 5th day of November, 2015, pursuant to 40 C.F.R. § 23.12, one copy of the foregoing **PETITION FOR REVIEW** and **RULE 26.1 CORPORATE DISCLOSURE STATEMENT** was sent by United States first class mail, postage prepaid, to each of the following:

Honorable Regina McCarthy
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Washington, D.C. 20460

Honorable Loretta E. Lynch
Attorney General of the United States
U.S. Department of Justice
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Washington, D.C. 20460

Honorable John C. Cruden
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice
Robert F. Kennedy Building
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Copies of the aforesaid **Petition for Review** and **Rule 26.1 Corporate Disclosure Statement** are being served on this date upon all parties of record in Docket No. 15-1363, *State of West Virginia et al. v. EPA*, through the Court's ECF electronic filing system.

In addition, copies of the aforesaid **Petition for Review** and **Rule 26.1 Corporate Disclosure Statement** are being served on this date by United States first class mail, postage prepaid, upon the following individuals:

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Eugene M. Trisko
Counsel for Petitioner