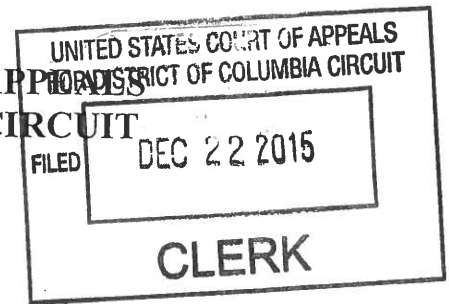


UNITED STATES COURT OF APPEALS  
FOR DISTRICT OF COLUMBIA CIRCUIT

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

DEC 22 2015



**RECEIVED**

NATIONAL RURAL ELECTRIC  
COOPERATIVE ASSOCIATION; BASIN  
ELECTRIC COOPERATIVE; EAST  
KENTUCKY POWER COOPERATIVE, INC.;  
HOOSIER ENERGY RURAL ELECTRIC  
COOPERATIVE, INC.; MINNKOTA POWER  
COOPERATIVE, INC.; SUNFLOWER  
ELECTRIC POWER CORPORATION; and TRI-  
STATE GENERATION & TRANSMISSION  
ASSOCIATION, INC.,

*Petitioners,*

v.

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY,

*Respondent.*

No. 15-1484

### PETITION FOR REVIEW

Pursuant to section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1), and Rule 15(a) of the Federal Rules of Appellate Procedure, the National Rural Electric Cooperative Association and the above-named member rural electric cooperatives hereby petition the Court for review of the final action of Respondent United States Environmental Protection Agency (“EPA”): “Standards of Performance for Greenhouse Gas Emissions From New, Modified, and Reconstructed Stationary Sources: Electric Utility Generating Units,” to be

codified at 40 C.F.R. Part 60, Subpart TTTT (the “Final Rule”). The Final Rule was published in the *Federal Register* at 80 Fed. Reg. 64,510 on October 23, 2015. A copy of EPA’s Final Rule is attached to this Petition.

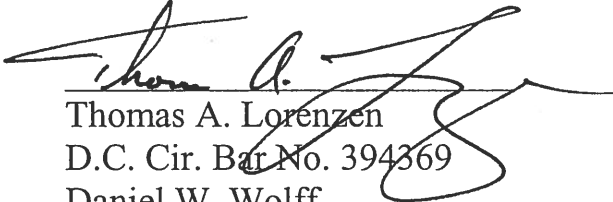
This Petition is timely filed within sixty days of that publication as required by Clean Air Act section 307(b)(1).

Dated: December 22, 2015

Respectfully submitted,

*Of Counsel*

Rae Cronmiller  
Environmental Counsel  
National Association of Rural Electric  
Cooperatives  
4301 Wilson Blvd.  
Arlington, VA 22203  
(703) 907-5500  
rae.cronmiller@nreca.coop

  
Thomas A. Lorenzen  
D.C. Cir. Bar No. 394369  
Daniel W. Wolff  
Sherrie A. Armstrong  
Crowell & Moring LLP  
1001 Pennsylvania Ave., N.W.  
Washington, DC 20004  
(202) 624-2500  
tlorenzen@crowell.com

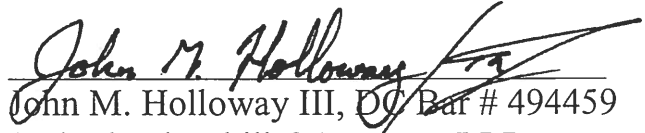
*Counsel for National Rural Electric  
Cooperative Association, Sunflower  
Electric Power Corporation, and Tri-  
State Generation & Transmission  
Association Inc.*



Christina F. Gomez  
Garrison W. Kaufman  
HOLLAND & HART LLP  
555 Seventeenth Street, Suite 3200  
Denver, CO 80202  
Ph. 303-295-8000 / Fx.: 303-295-8261  
cgomez@hollandhart.com  
gwkaufman@hollandhart.com

Patrick R. Day  
HOLLAND & HART LLP  
2515 Warren Avenue, Suite 450  
Cheyenne, WY 82001  
Ph.: 307-778-4200 / Fx.: 307-778-8175  
pday@hollandhart.com

*Counsel for Petitioner Basin Electric  
Power Cooperative*



John M. Holloway III, DC Bar # 494459  
Sutherland Asbill & Brennan LLP  
700 Sixth Street NW, Suite 700  
Washington, DC 20001  
(202) 383-0100  
Jay.holloway@sutherland.com

*Counsel for Petitioners East Kentucky  
Power Cooperative, Inc., Hoosier  
Energy Rural Electric Cooperative, Inc.,  
and Minnkota Power Cooperative, Inc.*

**CERTIFICATE OF SERVICE**

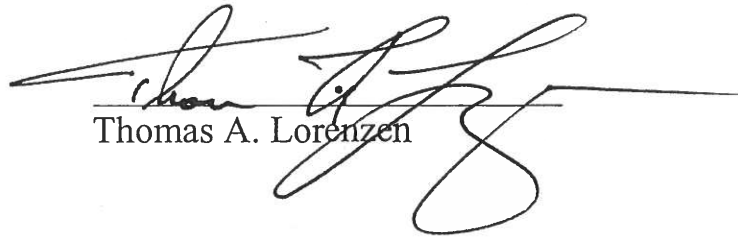
Pursuant to agreement with Counsel for Respondent EPA, I hereby certify that I have caused to be delivered via email, in lieu of mail or hand service, a copy of the foregoing Petition for Review and accompanying documents to the following:

For DOJ:

Brian Lynk: brian.lynk@usdoj.gov

For EPA:

Steven Silverman: silverman.steven@epa.gov

  
Thomas A. Lorenzen

Dated: December 22, 2015

UNITED STATES COURT OF APPEALS  
FOR DISTRICT OF COLUMBIA CIRCUIT

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

UNITED STATES COURT OF APPEALS  
FOR DISTRICT OF COLUMBIA CIRCUIT  
FILED DEC 22 2015  
15-1484 CLERK

DEC 22 2015  
**RECEIVED**  
 NATIONAL RURAL ELECTRIC  
 COOPERATIVE ASSOCIATION; BASIN  
 ELECTRIC COOPERATIVE; EAST  
 KENTUCKY POWER COOPERATIVE, INC.;  
 HOOSIER ENERGY RURAL ELECTRIC  
 COOPERATIVE, INC.; MINNKOTA POWER  
 COOPERATIVE, INC.; SUNFLOWER  
 ELECTRIC POWER CORPORATION; and TRI-  
 STATE GENERATION & TRANSMISSION  
 ASSOCIATION, INC.,

*Petitioners,*

v.

UNITED STATES ENVIRONMENTAL  
 PROTECTION AGENCY,

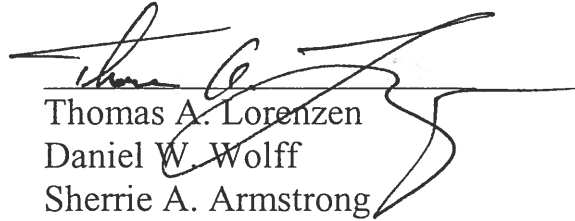
*Respondent.*

No. \_\_\_\_\_

**RULE 26.1 DISCLOSURE STATEMENT OF  
NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Circuit Rule 26.1, the National Rural Electric Cooperative Association (“NRECA”) declares as follows: NRECA is the national association of rural electric cooperatives. NRECA does not have a parent corporation, and no publicly held corporation owns 10% or more of its stock. NRECA is a “trade association” within the meaning of Circuit Rule 26.1(b).

Respectfully submitted,



Thomas A. Lorenzen

Daniel W. Wolff

Sherrie A. Armstrong

CROWELL & MORING LLP

1001 Pennsylvania Ave, NW

Washington, D.C. 20004

tlorenzen@crowell.com

dwoff@crowell.com

sarmstrong@crowell.com

(202) 624-2500

*Counsel for National Rural Electric  
Cooperative Association*

Dated: December 22, 2015