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Ms. Nancy Sutley, Chair
Council on Environmental Quality
Executive Office of the President
722 Jackson Place, NW
Washington, DC

Re: Interagency Carbon Capture and Storage Task Force

Dear Chair Sutley,

As the Carbon Capture and Storage Task Force brings its work to a close, we want to take this opportunity to summarize the readiness of FutureGen to support the Administration's strategy and to thank the task force co-chairs and agency staff for their leadership in developing the strategy. We look forward to its release.

We applaud President Obama for his leadership in committing to build at least five commercial-scale CCS projects by 2016, and launching the task force to develop the strategy. The final CCS strategy will receive global attention and the United States' credibility on climate change issues will be judged not only by the recommendations set forth by the task force, but also by the alignment of U.S. actions with that strategy.

It is clear that, given its global abundance and affordability, coal will remain a dominant fuel for decades to come. Coal currently supplies 50% of U.S. electricity and over 70% of the electricity in China and India. A realistic strategy to reduce CO₂ emissions must include the development of cost effective CCS technology. The rest of the world is looking to the U.S. to lead, and if we do not, it is unrealistic to expect other nations—especially the developing countries—to follow. As a result, there is substantial agreement across the scientific community, industry, and environmental organizations that integrating power plants with high rates of carbon capture and sequestration in saline formations is a linchpin element of any U.S. or global CCS strategy that leads to significant emissions reductions.

FutureGen is the only project in the U.S. Federal research, development, and demonstration portfolio that will prove-out near-zero emissions coal-fueled power production, with *90% carbon capture on the entire plant (not just a slip-stream)*, and carbon sequestration in a *deep saline geologic formation*. Deep saline geologic formations are the most abundant, largest capacity formations in the world for CO₂ storage and experts agree they are a prerequisite to successful widespread CCS deployment. FutureGen is unique in its international engagement and industrial participation. As a result, it is well positioned to support both the domestic and international elements of a CCS strategy. More than ten companies with business operations on six continents have participated in FutureGen and that participation is expected to expand. This global participation positions the project to quickly and smartly distribute the project information worldwide. The non-profit approach to the project further facilitates information transfer. Now is the appropriate time for the Administration to reaffirm the status of FutureGen as a flagship project, provide sufficient funding and leadership to assure its success, and highlight it in the CCS strategy.

FutureGen is ready to go:

- A Final Environmental Impact Statement and Record of Decision have been issued completing a multi-year process that other projects must still navigate prior to construction.
- Subsurface property rights have been secured for ~30 million tons of injected CO₂ over 20 years.
- Long-term stewardship and liability management issues, which are a well documented challenge for many projects, are resolved.
- Issuance of a draft CO₂ injection permit is imminent, and a final permit is expected early this fall.
- The local community is highly supportive of the project, which will allow the project to move swiftly once DOE announces a final “Go” decision.
- The project is prepared to award a number of major equipment and service contracts quickly after a full “Go” decision from the Department of Energy with more to come in the year ahead. This will help mobilize the U.S. manufacturing base and create jobs in numerous States.
- Significant international participation has been secured and the project will be conducted on a non-profit basis to help facilitate global transfer of CCS technology.

Industry remains committed to making FutureGen at Mattoon a reality. Our steadfast commitment to the project has been demonstrated consistently and repeatedly over the past five years. There is no question that a reaffirmation of FutureGen’s flagship status, ending the uncertainty of the last few years, will spur additional private sector participation on a global basis.

We have read the comments submitted to the task force during the public comment period. We are encouraged that such a strong and diverse constituency spoke in support of FutureGen. Among them were: an environmental NGO, the electricity sector, the coal sector, and research & development advocacy groups.

In closing, the Administration has advocated significant reductions in CO₂ emissions in the short-term and very aggressive reductions by 2030. Given that a power plant built today will likely continue operating through mid-century, the integration, demonstration, cost reduction through learning, and subsequent commercial deployment of CCS is essential if the Administration’s actions are to be aligned with its policy goals. The world will judge the U.S. on our tangible accomplishments, not aspirations and goals and FutureGen can be the flagship accomplishment of this Administration.

We want to again thank the agency staff supporting the task force for taking the time to be briefed on FutureGen in various venues. We also look forward to supporting the Administration’s implementation of the final strategy.

Sincerely,



Michael J. Mudd
Chief Executive Officer
FutureGen Alliance