

Ms. Gwen Ricco  
MC 205  
Office of Legal Services  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

RE: Rule Project Number 2024-005-OTH-NR

Dear Ms. Ricco,

July 18<sup>th</sup> 2024

Mustang Machinery Co. LLC. (Mustang Cat) is a privately held Caterpillar Inc. equipment dealer headquartered in Houston, Tx. Our customer service area includes Southeast Texas. Mustang Cat provides our customers with construction equipment and power systems as well as electric power generation.

Mustang Cat supports the proposed Air Quality Standard Permit for Electric Generating Units as published in the Texas Register on June 28, 2024. The proposed rule will provide our customers greater choice in solutions for their electric generating needs and provide much needed support to the Texas grid.

As written, the new proposed rule provides natural gas lean burn spark ignited reciprocating internal combustion engines (SI RICE) electric generating units (EGU) a permitting process currently utilized by natural gas rich burn SI RICE EGU. A standard permit for lean burn EGUs offers applicants more flexibility and serves as an alternative option to install and deploy equipment to support the Texas grid during extreme weather events including high demand during very hot or cold weather events. The lean burn EGUs can also be used to support the grid when intermittent renewables are unavailable. In addition, lean burn EGUs can also be used to support the grid as Texas experiences demand growth by allowing our customers to reduce load during critical times.

The standard permit parameters provided for in the proposed rule will ensure continued protection of the environment and remain in compliance with allowable emissions limits. Specifically, the rule sets out the parameters each site must meet to qualify for the standard permit ensuring air quality remains the priority.

We thank the Texas Commission on Environmental Quality for the opportunity to express our support on this matter. Approval of the proposed rule for a lean burn EGU standard permit will provide an additional reliability and resiliency option for the Texas grid.

Sincerely,



Paul Zink  
General Manager Electric Power  
Mustang Cat  
pzink@mustangcat.com

