

**BEFORE THE AIR QUALITY CONTROL COMMISSION
STATE OF COLORADO**

IN THE MATTER OF PROPOSED REVISIONS TO THE PROCEDURAL RULES (5 CCR
1001-1)

REQUEST FOR PARTY STATUS OF THE COLORADO CHAMBER OF COMMERCE

I. Identification of Applicant

This request for Party Status is submitted on behalf of the Colorado Chamber of Commerce (“Colorado Chamber”). This petition requests that the Colorado Chamber, the applicant, be granted “party status” in connection with the above-captioned hearing pursuant to C.R.S. §§ 24-4-101 *et seq.*; §§ 25-7-101 *et seq.*; and 5 C.R.R. 1001-1. The Notice of Rulemaking Hearing Before the Colorado Air Quality Control Commission states that all requests for party status must be filed by email by 5:00 p.m. on September 12, 2024. The Colorado Chamber timely files this request for party status.

The Colorado Chamber is the only business association that works to improve the business climate for all sizes of business from a statewide, multi-industry perspective. The Colorado Chamber plays a vital role as a unified voice for business and what it accomplishes is good for all businesses and good for the state’s economy.

The Colorado Chamber frequently participates in Commission rulemakings that impact its oil and gas operations in the state. The Colorado Chamber requests party status in the above-captioned hearing because it anticipates the proposed revisions to the Procedural Rules, or alternate proposals and revisions by other stakeholders in the rulemaking process, could impact its interest in ensuring the rules promote an efficient and effective rulemaking process.

II. Summary of Policy, Factual, and Legal Issues

The Colorado Chamber has identified certain policy and legal issues that it intends to comment on. These include but are not limited to: the presumptive timeframe for rulemakings; the number, type, and timing of written filings; the definition of Alternate Proposal and the requirements for Alternate Proposals; the requirement and process for an initial determination on whether a party’s proposed rule revisions are within scope and ripe for determination; the opportunity to file written rebuttal statements; proper use of the Statement of Basis and Purpose; and the order of hearing testimony. The Colorado Chamber will add value and an informed perspective on these issues, and others, based on its past involvement and experience with Commission rulemakings.

The Colorado Chamber continues to review the proposed rules and reserves the right to raise additional and more particular issues during the rulemaking proceedings, and to amend or supplement the policy, legal, and factual issues presented above. At this time, the Colorado Chamber does not intend to file an alternate proposal, but we are reviewing our anticipated

revisions and redlines to determine whether they constitute an alternate proposal and reserve the right to do so.

Future communications to the Colorado Chamber with respect to the above-captioned hearing should be sent to the Colorado Chamber's representative:

Astute Regulatory Solutions, LLC
Christy Woodward
Regulatory Affairs Advisor
1700 Broadway
Suite 525
Denver, CO 80290
CoChamberRegAffairs@cochamber.com

Respectfully submitted this 12th day of September 2024

/s/ Christy Woodward _____

Christy Woodward
Astute Regulatory Solutions, LLC

*Representative for the Colorado Chamber of
Commerce*

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2024, a true and correct copy of the foregoing Request for Party Status was sent via electronic mail, as requested by the Notice of Public Rulemaking Hearing, to the individuals and emails identified below:

NAME	REPRESENTATIVE
Air Quality Control Commission Staff	Air Quality Control Commission cdphe.aqcc@state.co.us
Robyn Wille	Air Quality Control Commission Attorney robyn.wille@coag.gov
Jeremy Murray	Air Pollution Control Division Staff jeramy.murray@state.co.us
Cory Haller	Air Pollution Control Division Attorney cory.haller@coag.gov

/s/ Natalie Boldt

Natalie Boldt