



November 8, 2013

The Honorable Fred P. Hochberg
Chairman and President
Export-Import Bank of the United States
811 Vermont Ave NW
Washington DC 20571

Re: Supplemental guidelines for High Carbon Intensity Plants

Dear Chairman Hochberg,

The Gas Turbine Association (GTA) appreciates the opportunity to provide comments on US Eximbank's proposed "Supplemental Guidelines for High Carbon Intensity Plants."

The GTA is the industry trade association for the industrial and electrical power generation gas turbine manufacturers and the companies that support the industry. GTA serves as the unified voice of the gas turbine industry. Gas turbines generate more than a quarter of our nation's electricity and are playing a greater and greater role in our country's energy independence and future. Our OEM members provide more than 200,000 direct high quality jobs in gas turbines in the US.

GTA notes that the guidelines are being proposed in order to adapt to the President's new policy to prohibit public financing for coal projects overseas, with limited exceptions. The guidelines, however, refer to "fossil fuel power generation plants" that exceed certain CO2 emissions limitations.

GTA believes that in referring to "fossil fuel power generation plants," ExIm is unintentionally opening the door to creating new and burdensome requirements for exporters of gas turbines that operate on alternative fuels, such as distillate or heavy fuel oil.

GTA recommends revising the language of the proposed guidelines to ensure that they remain consistent with the President's clear intent to address public financing of coal projects, as opposed to gas turbine technology.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert G. Hilton", is written over the typed name.

Robert G. Hilton
Chair, Board of Directors
Gas Turbine Association
118 Windsor Avenue
Kensington, CA 94708