**MEMORANDUM**

**Date:**  11/21/14

**From:** Ken Mitchell/EPA Region 4

**To:** Clean Power Plan for Existing Power Plants; Docket Id: OAR–2013-0602

**Subject:** Discussion of the Clean Power Plan with Florida Department of Environmental Protection

**Summary:**

Region 4 provided information on the Clean Power Plan to the Florida Department of

Environmental Protection on August 20, 2014. The Clean Power Plan for Existing Power Plants

was proposed on June 2, 2014.

**Attendees:**

**EPA**

Beverly Banister/EPA R4

Gregg Worley/EPA R4

Jeaneanne Gettle/EPA R4

Ken Mitchell/EPA R4

Keith Goff/EPA R4

Todd Rinck/EPA R4

EPA OAR OAQPS and OAP Staff

**External Stakeholders**

Paula Cobb/Florida DEP

Other DEP staff

**ATTACHMENT**

**Advance Questions for Discussion of the Clean Power Plan with the Florida DEP on 8/20/14**

1. Rate to mass goal.  Can you provide more insight into how this works (e.g., how to calculate the “business as usual” case)?
2. IPM Modeling.  Various questions about the modeling runs.  For example, are all the files on the website?  What were the underlying NEEDS (and other) data used in the IPM modeling?  (This issue can be followed-up by a staff-to-staff in-depth discussion.)
3. Non-affected units.  How can states include such units toward showing compliance (or can they)?  How do you incorporate non-affected units into the state plan if they only become affected after the State Plan is submitted?  Would such units affect the state’s goal?
4. Need more information on developing emissions projections (both for compliance and for developing rate-to-mass calculations).
5. When mistakes are found in state-specific data used to calculate the goal, how should that information be communicated to EPA (in addition to being submitted to the docket)?
6. “Capacity”.  The proposal seems to use multiple approaches to establishing “capacity” for units in a state (i.e., nameplate vs other types of capacity).  Was that intentional and, if so, why?
7. Dispatch to NGCC.  Did EPA consider limitations in infrastructure when establishing this number for goal setting?  For example, did EPA consider issues such as gas transport limitations and limitations in grid transmission?
8. Renewable Energy.  Can a state include alternate energy sources in compliance when the alternative energy may not be considered renewable energy (e.g., can you count waste-to-energy projects toward compliance)?  Also, how would biomass be treated?
9. What constraints are there in using nuclear up-rates in showing compliance?  For example, if an up-rate occurred in 2012, can that count towards showing compliance?