**MEMORANDUM**

**To:** Carbon Power Plan for Existing Power Plants; Docket id: OAR-2013-0602

**From:** Region 5, EPA

**Subject:** 8/27/14, Conference Call Regarding Proposed Carbon Plan for Existing Power Plants

**Summary**: A conference call was held between EPA and attendees from Ohio on October 7, 2014 to discuss the proposed Carbon Power Plan for Existing Power Plants.  The following list of questions was submitted for discussion by the Ohio Environmental Protection Agency

**Attendees may have included:** Carbon Pollution Input; Ward, Adam; Czerniak, George; Cain, Alexis; Furey, Eileen; Newman, Erin; Wilson, Erika; Dalcher, Debra; Solomon, David; Ketcham-Colwill, Jim; Santiago, Juan; Torres, Elineth; Topham, Nathan; Bremer, Kristen; Stevens, Gabrielle; Culligan, Kevin; Clouse, Matt; Fisher, Brian; Adamantiades, Mikhail; Bryson, Joe; Conlin, Beth; Sherry, Christopher; Eschmann, Erich; Dietsch, Nikolaas; Sims, Ryan; Murray, Beth; Harvey, Reid; Boswell, Colin; Fellner, Christian

The following questions were submitted prior to the call.

**Ohio EPA - Questions for USEPA Call**

**Scheduled for August 27, 2014**

**Rate to Mass Conversion:**

1. Can U.S. EPA please describe what an acceptable Rate-to-Mass conversion?

What are the attributes of an acceptable conversion equation?

Can USEPA please provide examples of an approved conversion?

How will shutdowns from the MATS rule be counted in the conversion to a mass based plan?

If shutdowns must be accounted for in determining a rate based goal, why are these shutdowns not accounted for in the mass determination in a manner that would give credit for the millions of tons of CO2 emissions that will be prevented by these shutdowns?

If guidance and/or examples are not available, when will they be provided?

**Other Questions:**

1. Can the data and analysis used in the projection of the 6% heat rate improvement be provided? Specifically, the database of existing CFPP units and 16 facilities that have achieved HRI of 3-8 percent year after year. Also, the EPA Region 7 study for seven coal fired units at three anonymous plants with details on the specific equipment upgrades. Per GHG Abatement Measures page 2-32

**IPM Related Questions:**

1. To date, numerous pieces of data and IPM support documentation have not been released including, but not limited to, the following:

* IPM Parsed Files: Option 1 State, 2030
* IPM Parsed Files: Option 1 Regional, 2025
* IPM Parsed Files: Option 1 Regional, 2030
* IPM Parsed Files: Option 2 State, 2025

During a recent conversation with USEPA, staff indicated that these parsed data files were unavailable for review and there was no intention of releasing them. We would like confirmation that this is the case. Alternatively, will EPA issue a NODA similar to the process in CSAPR when missing information was identified?

1. How did USEPA examine the IPM data to assess feasibility, projections and cost in the modelling data inputs and results if parsed data files were not available? Was there any state or unit specific analysis of the feasibility of the results performed?
2. Does EPA plan to reexamine mistakes in IPM modeling that states comment on?  If so, what will be the process for correcting the errors?
3. Did EPA look at any other “base” year than 2012?  Can an inventory of units in other years besides 2012 be provided to Ohio in the same format and parsed in the same manner as used for the goal setting portion? 2008 would be very valuable.  This would be the same format and have the same data as the TSD Excel spreadsheet *tsd-plant-level-data-unit-level-inventory\_App7.xlsx* and *tsd-egrid-methodology.xlsx.*
4. Can a state, in a state plan, take credit for all nuclear generation, or only 5.8%?
5. Can USEPA confirm that the shadow cost for Ohio in the IPM model was $11.30 in 2030?
6. How was EE represented and constrained in the IPM model?
7. Was any consideration given to base-load generation vs peaking generation in IPM?
8. Can USEPA confirm that no new NGCC generation was projected for Ohio by IPM in Option 1 – State scenario?
9. Was “remaining useful life” of specific units accounted for in the IPM model? How can states account for remaining useful life in examining their state goal and in developing their state plans?
10. Can a spreadsheet detailing the determination of the RE goals be provided?
11. How were renewables/RE accounted for in IPM in the Option 1 – State scenario?
12. Can updated capacity factor data for eGrid-2010 (2007 data) be provided? Capacity factor data is largely absent in this data set.
13. There is a ~10% difference between heat rates in IPM and those derived following USEPA’s methodology in the goal setting TSD. What is the cause of this difference?
14. Can USEPA confirm that the capacity factors projected by IPM case Option – 1 State are around 80 to 85% for coal?