From: Wilson, Erika

Sent: Friday, December 19, 2014 3:32 PM

To: [barclay.gibbs@ihs.com](mailto:barclay.gibbs@ihs.com)

Cc: Bremer, Kristen; Hackel, Angela; Risley, David

Subject: Web comment on the Clean Power Plan

Hello Mr. Gibbs

Thank you for your inquiry. In response to the question you submitted to the Clean Power Plan web site regarding applicability:

The 33% criteria only applies to turbines. It does not apply to steam thermal oil/gas. See applicability language on 79 FR 34854 at <https://www.federalregister.gov/articles/2014/06/18/2014-13726/carbon-pollution-emission-guidelines-for-existing-stationary-sources-electric-utility-generating>.

Thank you for your interest in the Clean Power Plan.

Erika Wilson

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Submitted on 09/02/2014 2:05PM

Submitted values are:

Name: Barclay Gibbs

Email: [barclay.gibbs@ihs.com](mailto:barclay.gibbs@ihs.com)

Comments: Applicability or coverage of CPP on generators includes a screen for recent capacity factor (33%). Question - - does the 33% apply to both gas/combustion turbines as well as steam thermal oil/gas? I have encountered some confusion in the marketplace where folks have seen information about steam thermal oil/gas units in the TSD and have concluded that low CF (far less than 33%) generators are indeed covered by the CPP proposal. Can you clarify? ...I suspect the technology is irrelevant.

Web Area: Carbon Pollution Standards