From: Wilson, Erika

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

To: [arjun@ieer.org](mailto:arjun@ieer.org)

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

Subject: Web comment on the Clean Power Plan

Hello

Thank you for your inquiry. In response to the question you submitted to the Clean Power Plan web site regarding differences in redispatched electricity:

The difference you reference in your question is attributable to states with "under construction" NGCC or IGCC. As explained in Step 3b on page 12 of the Goal Computation TSD at <http://www2.epa.gov/sites/production/files/2014-06/documents/20140602tsd-goal-computation.pdf>, "'under construction' is defined as anything that came online in 2013 or that was under construction, site prep, or testing by January 8, 2014. The EPA looked at reported data for 2012 and calculated the average performance of NGCCs that came online in the past 5 years and observed that 55% was the average capacity factor for these units. Therefore, the EPA assumed that a 55% capacity factor would be a reasonable representation for the expected generation of "under construction" NGCCs capacity under a business as usual scenario. The EPA conservatively designated the generation associated with this 55% capacity factor as unavailable for redispatch to reduce CO2 (i.e., not qualifying for building block 2), instead, reserving that amount of generation potential to meet other system needs presumed to have motivated the construction of the "under construction" NGCCs. Because these sources are nevertheless covered under the state emission rate goal, the emissions and generation from this 55% generation are added to the "other" category and averaged into the state goal calculation."

Thank you for your interest in the Clean Power Plan.

Erika Wilson

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Submitted on 08/22/2014 2:52PM

Submitted values are:

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Comments: Question: For some states, such as Virginia and Wyoming, the redispatched total electricity is not the same as the 2012 total. But it is the same for most states. Please provide an explanation for the cases where the redispatched amount is different from 2012. Thank you.

Web Area: Carbon Pollution Standards