
State Water Resources Control Board

SEP 12 2018

Mr. Rex Lewis
Managing Director, Plant Operations
Dynergy Moss Landing, LLC
Highway 1 & Dolan Road
PO Box 690
Moss Landing, CA 95039

Dear Mr. Lewis:

RE: GRID RELIABILITY INFORMATION REQUEST FOR MOSS LANDING GENERATING STATION

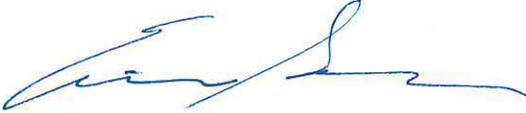
On May 4, 2010, the State Water Resources Control Board (State Water Board) adopted the statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (Once-Through Cooling or OTC Policy). To prevent disruption of the state's electrical power supply, Section 1.1 of the OTC Policy provides that the State Water Board will convene a Statewide Advisory Committee on Cooling Water Intake Structures to advise the State Water Board on grid reliability and the impact of OTC Policy implementation on local area and system reliability. In order to perform an updated grid reliability analysis, the State Water Board requires updates to the implementation plans submitted pursuant to Section 3.A of the OTC Policy.

Pursuant to the OTC Policy and California Water Code section 13383, the State Water Board requires that Dynergy provide the most current information for Moss Landing Generating Station (Moss Landing) and respond to the questions in Attachment A. Submission of the requested information is required no later than 60 days from receipt of this letter.

Please note that a compliance date extension request requires an amendment to the OTC Policy. Should circumstances that require an extension occur, such as a delay in construction schedule, Dynergy must submit a formal request for State Water Board consideration of an amendment to the compliance date set forth in the OTC Policy, along with supporting documentation. Please allow adequate time for the State Water Board to process a request.

If you have any questions regarding this information request, please contact Julie Johnson at (916) 341-5687 (Julie.Johnson@waterboards.ca.gov) or Katherine Faick at (916) 445-2317 (Katherine.Faick@waterboards.ca.gov).

Sincerely,



Eileen Sobeck
Executive Director

Enclosure:
Attachment A – Grid Reliability Information Request Questions for Moss Landing Generating Station

Attachment A – Grid Reliability Information Request Questions**MOSS LANDING GENERATING STATION**

The State Water Board's current understanding of the proposed path for compliance with the OTC Policy for each unit at Moss Landing Generating Station is:

On April 7, 2015, the State Water Board adopted an amendment to the OTC Policy, changing the Moss Landing OTC Policy compliance date from December 31, 2017, to December 31, 2020. On July 18, 2016, the OTC Policy amendment became effective upon approval by the Office of Administrative Law (Resolution No. 2015-0018).

Moss Landing Units 1 and 2 are dispatchable, combined cycle facilities that began commercial operation in 2002. In the November 2014 updated implementation plan and the March 2018 revised implementation plan for Moss Landing, Dynegy stated its intent to implement Track 2 for Units 1 and 2 and identified its plans to achieve Track 2 compliance through prior flow reduction credits, use of operational controls, and installation of technology controls. The State Water Board sent letters of approval for Moss Landing's Baseline Study Report for Impingement Mortality and Entrainment and the Pilot Study Design Plan for Supplemental Control Technology on December 1, 2017, and January 24, 2018, respectively.

Moss Landing shut down units 6 and 7 on January 1, 2017, and notified the State Water Board on January 5, 2017. Moss Landing is on track to comply with the OTC Policy by its December 31, 2020 compliance date.

Please respond to the following requests for information:

1. Please confirm that Dynegy still intends to achieve compliance for Moss Landing Units 1 and 2 through Track 2, as indicated in its February 2017 revised implementation plan and in Dynegy's January 17, 2018 information request submittal. If not, please provide an updated implementation plan.
2. Dynegy's revised implementation plan provides a compliance schedule for Moss Landing Units 1 and 2 to meet the final compliance deadline of December 31, 2020. Are there any expected changes to this schedule? If so, please provide details. Furthermore, if there have been any changes to the construction schedule for implementation measures at Units 1 and 2 since Dynegy's January 17, 2018 letter, please describe whether and how these changes would affect down time at Units 1 and 2 outside normally scheduled maintenance, including any dual unit outages.
3. Please briefly describe any actions Dynegy has taken to obtain permits, obtain contracts, or meet other regulatory obligations to implement Track 2 compliance with the OTC Policy since the SWRCB approved Dynegy's Pilot Study Design Plan on January 24, 2018.
4. Is there any other information that the State Water Board should be made aware?