



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

NOV 20 2017

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:

**SUBJECT: GRID RELIABILITY INFORMATION REQUESTS FOR MOSS LANDING
GENERATING STATION**

On May 4, 2010, the State Water Resources Control Board (State Water Board) adopted the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (Once-Through Cooling [OTC] Policy). To prevent disruption with 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 (SACCWIS) 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 previously submitted 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 requests that Dynergy provide the most current information for Moss Landing Generating Station (Moss Landing), updated from the previously-submitted plan and respond to the questions in the attached document. Submission of the requested information is required no later than 60 days from the date of this letter.

Please note that a compliance date extension request requires an amendment to the OTC Policy, which takes a minimum of one year to process. Should circumstances that require an extension occur, 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.

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | www.waterboards.ca.gov

Mr. Rex Lewis

- 2 -

Should you have any questions on this matter please feel free to contact Rebecca Fitzgerald, Chief of the Water Quality Standards and Assessment Section, at (916) 341-5775 Rebecca.Fitzgerald@waterboards.ca.gov or Maria de la Paz Carpio-Obeso, Chief of the Ocean Standards Unit, at (916) 341-5858 MarieleaPaz.Carpio-Obeso@waterboards.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Eileen Sobeck". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eileen Sobeck
Executive Director

Attachment

Attachment:

MOSS LANDING GENERATING STATION

- The following is the State Water Board's understanding of the proposed mechanism to bring each unit into compliance:

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 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 February 2017 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.

Moss Landing shut down Units 6 and 7 on January 1, 2017, and notified the State Water Board on January 5, 2017.

- Please respond to the following questions and 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. 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.
 3. What actions has Dynegy taken to obtain permits, contracts, or to meet other regulatory obligations to implement Track 2 compliance with the OTC Policy, other than the installation of variable speed pumps as identified in Dynegy's January 5, 2017 letter to the State Water Board?
 4. Please confirm Dynegy still believes that successful implementation of Track 2 for Moss Landing Units 1 and 2 would result in sufficient cooling to operate the Units at an annual capacity factor of 83.7 percent. If not, please provide updated capacity factors in the form of a before-and-after compliance table. Please provide the operating range in megawatts of the facility before and after compliance.
 5. Dynegy has indicated that all construction for implementation of measures to achieve Track 2 compliance are expected to be performed during normally scheduled maintenance outages and that no dual unit outages are expected to be necessary to achieve Track 2 compliance. Have there been any changes to the construction schedule since Dynegy's January 5, 2017 letter? If so, please describe whether and how these changes would affect down time at Units 1 and 2 outside of normally scheduled maintenance, including any dual unit outages.
 6. Is there any other information that the State Water Board should be made aware of?