



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

September 18, 2013

Mr. Peter Landreth  
GenOn Delta, LLC  
696 West 10<sup>th</sup> Street  
P.O. Box 192  
Pittsburg, CA 94565

Dear Mr. Landreth:

### INFORMATION REQUIREMENTS FOR MANDALAY GENERATING STATION

On November 30, 2010 a letter was sent out by the State Water Resources Control Board's (State Water Board) Executive Director requiring the submittal of an Implementation Plan (Plan) by April 1, 2011. The letter outlined the required information to include in the Plan, including information on planned actions for compliance with the Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (Policy). If final compliance by October 1, 2015, is not feasible interim mitigation measures must be identified in the Plan.

Due to the current uncertainty as to conditions identified in implementation plans previously submitted from the Once-Through Cooling (OTC) power plants with a near term compliance deadline, further information and data input is necessary to conduct grid reliability analysis to determine the impact on local and system reliability.

Pursuant to the Policy and California Water Code section 13383, the State Water Board requires GenOn Delta (now NRG) to provide the most current information for Mandalay Generating Station (Mandalay) in the previously-submitted Plan if the following content is not up-to-date or is inaccurate:

1. What mechanism is being used to bring this unit into compliance?

The Mandalay Generating Station Units 1 and 2 (an aggregate of 430 Mega Watt [MW]) are scheduled to retire by December 31, 2020. In a May 14, 2012 letter to the State Water Board, GenOn Delta stated its intention to submit plans to replace these facilities with units using dry air cooling technology. GenOn Delta stated that it planned to revise its Plan to ensure that it could complete its replacement plan by the December 31, 2020 compliance date.

2. What actions have been taken to obtain permits, obtain contracts or meet other regulatory obligations to implement the compliance mechanism identified above?

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, Ca 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

Per GenOn Delta's May 14, 2012 letter, the project has not been submitted to the California Energy Commission for licenses or the Ventura County Air Pollution Control Board for permits.

3. What is the capacity of the repowered/replaced/retrofitted facility?

As of May 15, 2013, the capacity of the Mandalay replacement facility has not been released publicly.

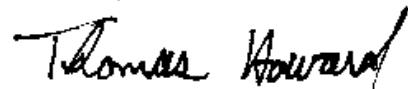
4. Are retirements covered by California Public Utilities Commission's (CPUC) authorized procurements?

The CPUC's 2012 Long-Term Procurement Plan Track 1 Decision (D.)13-02-015 authorized the procurement of between 215 and 290 MW in the Moorpark sub-area of the Big Creek/Ventura local area to meet reliability needs after the retirement of Ormond Beach and Mandalay Generating Stations.

Submission of the above information is required no later than 60 days after the date of this letter.

Should you have any questions on this matter please feel free to contact Mr. Jonathan Bishop, Chief Deputy Director, at (916) 341-5820 ([jsbishop@waterboards.ca.gov](mailto:jsbishop@waterboards.ca.gov)) or Dr. Maria de la Paz Carpio-Obeso, Chief of the Ocean Unit, at (916) 341-5858 ([mcarpio-obeso@waterboards.ca.gov](mailto:mcarpio-obeso@waterboards.ca.gov)).

Sincerely,



Thomas Howard  
Executive Director

ECM# 1085027