

State Water Resources Control Board

NOV 7 2016

Mr. George L. Piantka
Director, Regulatory Environmental Service
NRG Energy, West Region
5790 Fleet Street
Carlsbad, CA 92008

Dear Mr. Piantka:

INFORMATION REQUIREMENTS FOR PITTSBURG 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 requires that NRG Energy (NRG) provide the most current information for Pittsburg Generating Station (Pittsburg), updated from the previously-submitted Plan (See attachment).

Please note that a compliance date extension request requires an amendment to the OTC Policy. If and when circumstances that require an extension occur, NRG 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 consider and process a request. The State Water Board requires a minimum of one year to process an OTC Policy compliance date deferral request.

Submission of the requested information is required no later than 60 days from the date of this letter.

Mr. George L. Piantka

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Should you have any questions on this matter please feel free to contact Mr. Jonathan Bishop, Chief Deputy Director, at (916) 341-5820 Jonathan.Bishop@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,


Thomas Howard
Executive Director

Attachment:

PITTSBURG GENERATING STATION

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

In its February 12, 2016 letter to the State Water Board, NRG stated its path to achieve Track 1 compliance of the OTC Policy for Pittsburg Units 5 and 6 by completing a retrofit project that would replace OTC flow with a closed-cycle cooling system and subsequently retire Pittsburg Unit 7. NRG concluded that this retrofit project would be feasible from a technical, logistical, environmental, and permitting perspective. NRG expects Pittsburg to be in compliance by December 31, 2017, its OTC Policy compliance date.

The project may be infeasible if NRG cannot secure sufficient contractual coverage that (1) ensures Pittsburg Units 5 and 6 will remain in service beyond 2017; and (2) provides a sufficient revenue stream to fund the costs of the retrofit project.

Please respond to the following questions and requests for information:

1. Have there been changes to the implementation plan for Pittsburg? Specifically, does NRG still intend to retrofit Pittsburg Unit 7 to a closed-cycle cooling system to provide cooling flow for Pittsburg Units 5 and 6 by December 31, 2017? Does NRG still intend to retire Pittsburg Unit 7 by December 31, 2017? Please describe in detail any other changes to the implementation plan.
2. Has NRG secured the financing and revenue streams needed to execute the retrofit project described in the implementation plan? Please explain.
3. What actions have been taken to obtain contracts and permits needed to execute the retrofit project described in the implementation plan?
4. Is there sufficient time to obtain all contracts and permits needed to complete the retrofit project and retire Pittsburg Unit 7 by December 31, 2017?
5. Please describe the plan to implement interim mitigation measures, including timing and status of required permits.
6. What will be the capacity of the repowered/replaced/retrofitted facility?
7. Is there any other information that the State Water Board should be made aware?