



NRG Delta, LLC
Pittsburg Generating Station
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April 23, 2015

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DIVISION OF WATER QUALITY

Mr. Thomas Howard
Executive Director
State Water Resources Board
Division of Water Quality, 15th Floor
1001 I Street
Sacramento, CA 95814

**Re: Once-Through Cooling Policy Implementation Plan Update for Pittsburg Generating Station;
Letter dated February 24, 2015**

Dear Mr. Howard,

NRG Delta, LLC (Delta), owner of the Pittsburg Generating Station (PGS), submits its response to the State Water Resources Control Board's (SWRCB) February 24, 2015 letter in which the SWRCB requested the most current information for PGS pursuant to the Use of Coastal and Estuarine Water for Power Plant Cooling (Policy) and California Water Code §13383. Delta reported the future compliance mechanisms and electrical generation goals to the SWRCB in a letter submitted on November 7, 2013. Delta respectfully re-states and clarifies its position to the questions, which were posed by the SWRCB in the February 24, 2015 letter.

1. *The SWRCB stated its current understanding of the mechanism being used to bring each unit into compliance.*

The SWRCB's current understanding is correct. Delta continues to pursue Track 1 compliance for once-through-cooling (OTC) Units 5 and 6 by retrofitting the Unit 7 closed-cycle cooling system to provide compliant cooling flow for Units 5 and 6, and subsequently retire Unit 7. The retrofit project remains feasible from a technical, logistical, environmental, and permitting perspective. Delta has no changes to its Implementation Plan to report at this time.

2. *The SWRCB stated its current understanding of the actions taken to obtain permits, obtain contracts or meet other regulatory obligations to implement the compliance mechanism identified above.*

Delta has had informal discussions with Pacific Gas & Electric Company regarding a potential contract that would enable the retrofitting project to go forward, but no contract is in place at this time. Therefore, Delta has not filed permit applications at this time with regulatory or permitting agencies to retrofit PGS.

3. Describe the timing and status of required permits?

Since the retrofit project would utilize existing infrastructure and involve minimal new construction, Delta expects permitting to be relatively straightforward. Delta anticipates that permitting would take approximately 6 months, primarily related to various approvals required from the City of Pittsburg and the BAAQMD. Delta anticipates that the existing PGS NPDES permit, as well as existing permits authorizing the incidental take of listed species under the federal Endangered Species Act and California Endangered Species Act, could be modified or amended to continue to authorize discharges under its NPDES permit and enable any potential aquatic impacts associated with the operation of the converted Units 5 & 6, which would be significantly less than the potential impacts associated with current once-through cooling operations.

Currently, Delta has not formally begun the process of acquiring these permits, but believes they can be acquired to allow for compliance by the December 31, 2017 Policy deadline.

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

The existing capacity of Units 5 and 6 is 660 megawatts gross (MWg). As previously stated the capacity of the planned retrofit project has not been finalized. Delta does not expect the planned retrofit to exceed 660 megawatts gross (MWg).

5. Are retirements covered by the California Public Utilities Commission's authorized procurements?

NRG agrees with the Water Board's characterization of the California Independent System Operator's analysis of the Pittsburg sub-area, but NRG believes that there may be a continuing demand for generation from the Pittsburg Generating Station.

I anticipate the above information has addressed the SWRCB's questions regarding Pittsburg's Implementation Plan. If you have any questions, comments, or concerns, please do not hesitate to contact me at george.piantka@nrg.com or (760) 710-2156, or Peter Landreth at peter.landreth@nrg.com or (415) 627-1641.

Sincerely,
NRG Delta, LLC/Pittsburg Generating Station



George L. Piantka, PE
Director, Regulatory Environmental Services
NRG Energy, West Region

cc: Lawrence Penn, Pittsburg Generating Station
Peter Landreth, NRG West Region
Tim Sisk, NRG West Region