

DWQ  
DYNEGY MOSS LANDING, L.L.C  
Moss Landing Power Plant  
PO BOX 690.  
MOSS LANDING CA 95039  
831-633-6700

**CERTIFIED MAIL # 7017 1450 0000 8343 8384  
RETURN RECEIPT**

October 30, 2018

NOV 5 2018

Eileen Sobeck  
Executive Director  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**Re: Response to SWRCB September 12, 2018 Letter regarding "Grid Reliability Information Request for Moss Landing Generating Station" concerning the Once-Through Cooling Policy**

Dear Director Sobeck:

Dynegy Moss Landing, LLC (DML) submits this response to the information requested by the State Water Resources Control Board (SWRCB) September 12, 2018 letter regarding "Grid Reliability Information Request for Moss Landing Generating Station", as pertaining to the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (OTC Policy).

The four questions and requests for information set forth in the SWRCB's letter are restated below and followed by DML's responses.

- 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.***

DML still intends to achieve compliance for Moss Landing Units 1 and 2 through Track 2 by December 31, 2020.

- 2. Dynegy's revised implementation plan provides a compliance schedule for Moss Landing Unit 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.***

There are no expected changes to the compliance schedule with respect to Moss Landing Units 1 and 2. There have been no changes to the construction schedule since our January 17, 2018 letter. All construction for implementation of measures to achieve Track 2 compliance is expected to be performed during normally scheduled maintenance outages for Units 1 and 2. No dual unit outages are expected to be necessary for implementation of the measures to achieve Track 2 compliance.

**3. Please briefly describe any actions Dynegy has taken to obtain permits, 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.**

The California Energy Commission (CEC) *Application for Certification for the Moss Landing Power Plant Project, Docket No. 99-AFC-4* for Units 1 and 2, requires DML to petition the CEC requesting an amendment for modifying the project design or operational requirements. On April 19, 2018, DML submitted the MLPP Pilot Study Design Plan for Supplemental Control Technology and the SWRCB Approval of Pilot Study Design for Supplemental Control Technology letter to the CEC for their review to determine if an amendment was necessary.

On June 25, 2018 Mary Dyas, Compliance Project Manager for the CEC, responded via e-mail:

"Staff has reviewed the information provided and have found that the proposed change of mesh screen size submitted with your April 19, 2018 email (and is proposed as an element of the 2017 OTC Implementation Plan and Pilot Study Design Plan), is consistent with the EPA's Rulemaking under Section 316(b) of the Clean Water Act and as described in 40 CFR Part 125, Subpart J. Energy Commission Biological Resources staff has no comments or recommended requirements for this action."

DML is in the process of installing the Supplemental Control Technology and studying the changes to achieve compliance for Moss Landing Units 1 and 2 through Track 2 by December 31, 2020.

**4. Is there any other information that the State Water Board should be made aware of?**

No.

If you have questions regarding the above information, please contact Ernie Bloecher at 831-633-6786 or [Ernie.Bloecher@vistraenergy.com](mailto:Ernie.Bloecher@vistraenergy.com).

Sincerely,



REX A. LEWIS  
Managing Director Plant Operations  
Moss Landing Power Plant

ECBloecher

cc: Julie Johnson  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Katherine Faick  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814