

Appendix F

ERC Profile Check

Year equipment January February March April May June July August September October November December Total

2010	Unit 1	4.8	23.7	0	0.4	0	0.7	83.8	106.5	19.7	34.6	14.7	25.4	314.3
	Quarterly	9.1%	23.1	0.6	0	0.3%	0.9	178.7	127.4	59.1	73.6	22.6	24.4	587.7
	Unit 2	77.3	23.1	0.6	0	0	0.9	178.7	127.4	59.1	73.6	22.6	24.4	587.7
	Quarterly	17.2%	23.1	0.6	0	0.2%	0.9	178.7	127.4	59.1	73.6	22.6	24.4	587.7
avg both units														
	ERC's	13%	25%			0%		64%	25%			22%	25%	100.0%
	Lower value	13%	25%			0%		25%	25%			22%	25%	61%

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2011	Unit 1	82.5	0	0	6.2	0	53.6	91	50.1	50.2	0	0.6	0	334.2
	Quarterly	24.7%	4.8	0	74.7	17.9%	19	57.2%	53.1	67	29	0.2%	13.9	100.0%
	Unit 2	100.9	4.8	0	74.7	110	19	0	53.1	67	29	0.2%	13.9	507.7
	Quarterly	20.8%	4.8	0	74.7	40.1%	19	0	23.7%	67	29	15.4%	42.1	100.0%
avg both units														
	ERC's	23%	25%			29%		40%	25%			8%	25%	100.0%
	Lower value	23%	25%			25%		25%	25%			8%	25%	80.5%

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2012	Unit 1	49	22.3	0.5	0	83.9	49.9	155.9	387.5	79.1	106.7	143.7	61.7	1140.2
	Quarterly	6.3%	0	0	0	11.7%	74.1	54.6%	380.2	269.9	101.7	89.1	42.1	100.0%
	Unit 2	0.3	0	0	16.6	106.5	74.1	86.1	380.2	269.9	101.7	89.1	42.1	1166.6
	Quarterly	0.0%	0	0	16.6	16.9%	74.1	86.1	380.2	269.9	101.7	89.1	42.1	100.0%
avg both units														
	ERC's	3%	25%			14%		59%	25%			24%	25%	100.0%
	Lower value	3%	25%			14%		25%	25%			24%	25%	66.1%

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2013	Unit 1	143.6	0.6	0	0	127	125.4	122.7	46.8	71.5	48.8	191.9	184.8	1063.1
	Quarterly	13.6%	14.6	201.6	141.5	178.1	151.9	97.6	67.1	86.1	37.8	40.0%	189.8	100.0%
	Unit 2	104.4	14.6	201.6	141.5	178.1	151.9	97.6	67.1	86.1	37.8	40.0%	189.8	1429
	Quarterly	22.4%	14.6	201.6	141.5	178.1	151.9	97.6	67.1	86.1	37.8	40.0%	189.8	100.0%
avg both units														
	ERC's	18%	25%			28%		20%	25%			34%	25%	100.0%
	Lower value	18%	25%			25%		20%	25%			25%	25%	88.1%

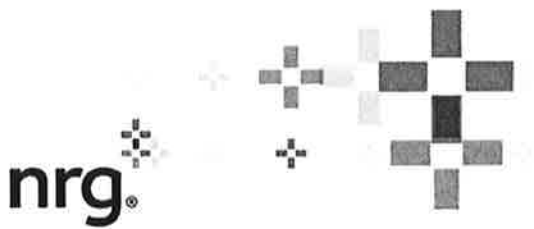
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2014	Unit 1	89	19.7	6	60.8	37.9	9.4	25.8	41.4	70.3	191.9	86.7	108.3	747.2
	Quarterly	15.4%	79.6	3.4	130.7	41.6	9.1	47.1	50.3	40	183	42.6	57.6	828.8
	Unit 2	143.8	79.6	3.4	130.7	41.6	9.1	47.1	50.3	40	183	42.6	57.6	1429
	Quarterly	27.4%	79.6	3.4	130.7	21.9%	9.1	47.1	50.3	40	183	42.6	57.6	100.0%
avg both units														
	ERC's	21%	25%			18%		17%	25%			43%	25%	100.0%
	Lower value	21%	25%			18%		17%	25%			25%	25%	82.0%

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2010-2014	Unit 1	368.9	66.3	6.5	67.4	248.8	239	479.2	632.3	290.8	382	437.6	380.2	3599
	Quarterly	12.3%	122.1	206.6	363.5	436.2	255	409.5	39.0%	522.1	425.1	33.3%	327.8	100.0%
	Unit 2	426.7	122.1	206.6	363.5	436.2	255	409.5	39.0%	522.1	425.1	33.3%	327.8	4519.8
	Quarterly	16.7%	122.1	206.6	363.5	23.3%	255	409.5	35.6%	522.1	425.1	24.4%	327.8	100.0%
avg both units														
	ERC's	14%	25%			19%		37%	25%			29%	25%	100.0%
	Lower value	14%	25%			19%		25%	25%			25%	25%	83.9%

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March 29, 2016

Kerby E. Zozula
Manager, Engineering Division
Ventura County Air Pollution Control District
669 County Square Drive, 2nd Floor
Ventura, CA 93003

Subject: Application for an Authority to Construct/Determination of Compliance for the Proposed Puente Power Project (ATC No. 00013-370)

Dear Mr. Zozula:

The Puente Power Project (P3 or project) Application for an Authority to Construct (ATC)/Determination of Compliance (DOC) was submitted to the Ventura County Air Pollution Control District (VCAPCD) on March 19, 2015, and was accepted as complete on May 28, 2015. The project includes the installation of a new simple-cycle GE 7HA.01 natural gas fired combustion turbine generator (CTG). As discussed in the ATC/DOC application package, the P3 triggers the VCAPCD New Source Review (NSR) emission offset requirements for NO_x emissions, and the Applicant has obtained a sufficient amount of NO_x emission reduction credits (ERCs) from Southern California Edison (SCE) to cover this NO_x ERC requirement.

VCAPCD Rule 26.6(F) requires that the quarterly operating profiles of the P3 be compared to the quarterly operating profiles of the SCE NO_x ERCs to ensure that the minimum 80% total required by Rule 26.6(F) is achieved. The P3 is expected to be a peaking facility that will be dispatched and used only when needed for grid support requirements. Therefore, it is difficult to predict the expected number of hours the plant will actually operate. Because the P3 will replace many of the grid support activities currently being provided by Mandalay Generating Station (MGS) Units 1 and 2, the Applicant believes the quarterly operating profiles for the P3 will be similar to quarterly profiles for MGS Units 1 and 2. In the enclosed summary tables, the Applicant sets the P3 quarterly operating profiles equal to the three-year average quarterly operating profiles for MGS Units 1 and 2. This analysis is based on the actual gross electrical output for MGS Units 1 and 2. As shown in these tables, the expected quarterly operating profiles for the P3 comply with the 80% total required by Rule 26.6(F).

If you have any questions or comments, please do not hesitate to contact me at (760) 710-2156.

Sincerely,

A handwritten signature in cursive script, appearing to read "George L. Piantka".

George L. Piantka, PE
Sr. Director, Regulatory Environmental Services
NRG Energy, Inc.

Enclosures (Tables 1 and 2)

cc: CEC Dockets
Leonard Scandura, SJVAPCD
Michael J. Carroll, Latham & Watkins
Anne Connell, AECOM

Table 1
Combined Gross Output (MW-hr) for MGS Units 1 and 2 (2013 to 2015)

Quarter	Gross Output (MW-hr)	
2013-Q1	42,345	
2013-Q2	70,616	
2013-Q3	47,538	
2013-Q4	76,407	
Total	236,906	
2014-Q1	31,665	
2014-Q2	28,688	
2014-Q3	27,856	
2014-Q4	69,204	
Total	157,413	
2015-Q1	5,781	
2015-Q2	67,153	
2015-Q3	137,473	
2015-Q4	55,874	
Total	266,281	
3-Year Avg	Gross Output (MW-hr)	
Q1	26,597	
Q2	55,486	
Q3	70,956	
Q4	67,161	
Total	220,200	

Table 2
VCAPCD Rule 26.6(F) Quarterly Operating Profile Check for P3 NOx ERCs

Calendar Quarter	MGS Units 1 and 2 3-Year Average Combined Gross MW-hr Output	MGS Units 1 and 2 3-Year Average Quarterly Operating Profile	Expected P3 Average Quarterly Operating Profile	Quarterly Operating Profile of SCE NOx ERCs ^a		VCAPCD Rule 26.6(F) Quarterly Operating Profile Adjustment ^b	VCAPCD Rule 26.6(F) Minimum Threshold	P3 Complies with VCAPCD Rule 26.6(F)?
				ERCs ^a	ERCs ^a			
Q1	26,597	12.1%	12.1%	25.0%	12.1%		80%	Yes
Q2	55,486	25.2%	25.2%	25.0%	25.0%			
Q3	70,956	32.2%	32.2%	25.0%	25.0%			
Q4	67,161	30.5%	30.5%	25.0%	25.0%			
Total =	220,200	100.0%	100.0%	100.0%	87.1%			

Notes:

- a. Based on SCE NOx ERCs quarterly operating profiles shown in <http://www.vcapcd.org/pubs/Engineering/permits2000/Forms/ERCReport.pdf>.
- b. Per VCAPCD Rule 26.6(F), lower of quarterly operating profile for project vs. quarterly operating profile for ERC used for project.