

**Dynergy Moss Landing, LLC**  
**Moss Landing Power Plant**  
Highway 1 & Dolan Road  
Moss Landing, CA 95039-0690

**Mailing Address**  
P.O. Box 690  
Moss Landing, CA 95039-0690

Phone 831.633.6700  
Fax 831.633.6625



**DYNERGY**

**FEDEX**

February 25, 2016

Michael A.M. Lauffer, Chief Counsel  
State Water Resources Control Board  
1001 I Street, 22nd Floor  
Sacramento, CA 95814-2828

Philip Isorena  
Chief of the NPDES Unit  
State Water Resources Control Board  
Division of Water Quality, 15<sup>th</sup> Floor  
1001 I Street  
Sacramento, CA 95814

**Re: Annual Update for 2015; Settlement Agreement between SWRCB and  
Dynergy regarding Once-Through Cooling Water Policy**

Dear Messrs. Lauffer and Isorena:

Dynergy Moss Landing, LLC (Dynergy Moss Landing) submits this annual update for calendar year 2015 pursuant to paragraphs 2.1.6.c and 2.1.7.e of the Settlement Agreement and Release Regarding Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling Between State Water Resources Control Board (SWRCB) and Dynergy (Settlement Agreement), as executed on October 9, 2014.

Paragraph 2.1.7.e of the Settlement Agreement provides that Dynergy Moss Landing will provide the SWRCB with updates annually, as described in paragraph 2.1.6.c, on its implementation of the Policy. Paragraph 2.1.6.c of the Settlement Agreement, in turn, specifies that, starting in 2015, by March 1 of each year, Dynergy Moss Landing will provide the SWRCB with an annual update on the status of (1) operational or other supplemental measures undertaken in the previous calendar year to reduce entrainment or impingement mortality, and (2) any studies undertaken in the previous calendar year to determine compliance options to meet Track 2 requirements.

In March 2015, Dynergy Moss Landing started entrainment and impingement sampling at the Moss Landing Power Plant (MLPP) in accordance with the proposed Monitoring Plan for Impingement Mortality and Entrainment (Dec. 10, 2014) as was submitted to the SWRCB. See Table 1 for all sampling dates in 2015. No results are available at this date.

**Table 1.** Summary table showing the number of impingement and entrainment samples collected by survey from project inception (March 2015) to the start of January 2016. Each Survey represents a 24 hour sampling period beginning close to midday on the start date shown in the table and ending close to midday on the following day. Four consecutive impingement samples are collected each survey on a 6 hour cycle from both intake locations (Units 1&2 and Units 6&7). Impingement samples are only collected when the corresponding units are operating on the day of the pre-scheduled survey. Six consecutive entrainment samples are collected each survey on a 4 hour cycle from both intake locations. Entrainment samples are always collected at both intake locations, whether or not the intakes are operating on the day of the pre-scheduled survey. In addition, a single meroplankton sample was collected once per month using a finer mesh net. The surveys are pre-scheduled on a weekly basis from November through June and every second week from July through October. Table rows are shaded by month.

Survey Start Date	Impingement		Entrainment			
	Units 1&2	Units 6&7	Units 1&2	Units 6&7	Mero-plankton	
03/18/15	-	-	6	6	1	Weekly Entrainment
03/24/15	4	-	6	6		
04/02/15	-	-	6	6	1	
04/08/15	-	-	6	6		
04/14/15	-	-	6	6		
04/21/15	4	4	6	6		
04/30/15	-	-	6	6		
05/05/15	4	4	6	6	1	
05/12/15	-	-	6	6		
05/20/15	4	-	6	6		
05/26/15	-	-	6	6		
06/03/15	4	4	6	6		
06/09/15	-	-	6	6		
06/17/15	4	-	6	6	1	
06/23/15	-	-	6	6		
06/30/15	4	4	6	6		
07/15/15	4	-	6	6		Biweekly Entrainment
07/29/15	4	-	6	6	1	
08/04/15	4	4	-	-		
08/12/15	4	-	6	6	1	
08/26/15	4	-	6	6		
09/16/15	4	-	-	-		
09/23/15	4	-	6	6	1	Weekly Entrainment
10/07/15	4	4	6	6	1	
10/21/15	4	-	6	6		
11/04/15	4	-	6	6		
11/10/15	-	-	6	6	1	
11/18/15	4	-	6	6		
11/23/15	-	-	6	6		Weekly Entrainment
12/01/15	4	-	6	6		
12/10/15	-	-	6	6	1	
12/15/15	4	-	6	6		
12/21/15	-	-	6	6		
12/29/15	4	-	6	6		
01/05/16	-	-	6	6	1	

Moreover, in accordance with Settlement Agreement paragraph 2.1.6.b, in 2015 Dynegy Moss Landing continued to implement operational control measures at the MLPP to reduce flow. These measures involve MLPP written operating procedures limiting the duration of circulating water pump operation during unit startup and shutdown and limiting the number of circulating water pumps in operation during various unit operating configurations at less than full utilization. Dynegy Moss Landing also reduced flow during the spring and fall entrainment and impingement seasons by taking a total of 65 days of planned maintenance outages at MLPP in February, April, May and November 2015. We also note that, due to limited demand in the relevant electricity market in 2015, MLPP Units 6&7 had a combined net capacity factor in 2015 of 4.1 percent, which resulted in limited actual cooling water intake flows for these units.

In addition, in preparation for meeting the Settlement Agreement's December 31, 2016 deadline to install variable speed drive (VSD) controls on the circulating water pumps for Units 1 and 2, Dynegy Moss Landing has contracted for purchase and installation of VSD controls for four circulating water pumps. In 2015, Dynegy Moss Landing performed engineering design and obtained bids regarding the VSD controls and, in January 2016, a purchase order was issued to Buckles-Smith Electric Co. through Rockwell for the VSD controls and the associated equipment enclosure. In January 2016, Dynegy Moss Landing also filed a permit application with the Monterey County Planning Department for a Coastal Administration Permit to install the VSDs. Preliminary design to install the VSDs has been completed and the VSDs are expected to be delivered by July 2016. Installation work is anticipated to start by August 2016, depending on completion of the Monterey County permit approval process. Dynegy Moss Landing expects the installation to be complete in advance of the December 31, 2016 Settlement Agreement deadline.

No additional studies were conducted or initiated in 2015 to evaluate compliance options to meet Track 2 requirements at MLPP.

If you have any questions concerning this annual update for 2015, please contact Lee Genz, Sr. Environmental Professional, at 831-633-6785 or by e-mail at [Lee.Genz@dynegy.com](mailto:Lee.Genz@dynegy.com).

Regards,



REX A. LEWIS  
Managing Director  
Moss Landing and Oakland Power Plants

LHGenz

cc: Mr. Ken Harris, Executive Officer  
California Central Coast Regional  
Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401  
Attn: Peter von Langen, PhD

Elizabeth Ewens, Ellison, Schneider & Harris L.L.P. (via email)