



DYNEGY MOSS LANDING, LLC  
P.O. Box 690  
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831-633-6700

January 17, 2018

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

**Re: Response to SWRCB November 20, 2017 Letter regarding "Grid Reliability Information Requests for Moss Landing Generating Station" concerning the Once-Through Cooling Policy**

Dear Director Sobeck:

Dynergy Moss Landing, LLC (DML) submits this response to the information requested by the State Water Resources Control Board (SWRCB) November 20, 2017 letter regarding "Grid Reliability Information Requests 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 six 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 Dynergy still intends to achieve compliance for Moss Landing Units 1 and 2 through Track 2, as indicated in its February 2017 revised implementation plan. If not, please provide an updated implementation plan.**

DML still intends to achieve compliance for Moss Landing Units 1 and 2 through Track 2.

**2. Dynergy'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.**

There are no expected changes to the compliance schedule with respect to Moss Landing Units 1 and 2.

**3. What actions has Dynergy taken to obtain permits, contracts, or to meet other regulatory obligations to implement Track 2 compliance with the OTC Policy, other than the installation of variable speed pumps as identified in Dynergy's January 5, 2017 letter to the State Water Board?**

In September 2017, DML submitted its Baseline Study Report for Impingement Mortality and Entrainment to the State Water Board for approval. DML also submitted the Baseline Study Report to the Central Coast Regional Water Quality Control Board as a supplement to its pending NPDES permit renewal application. By letter dated December 1, 2017, the State Water Board approved DML's Baseline Study Report. In November 2017, DML submitted its Pilot Study Design Plan for Supplemental Control Technology to the State Water Board for approval.

4. ***Please confirm Dynegy still believes that successful implementation of Track 2 for Moss Landing Units 1 and 2 would result in sufficient cooling to operate the Units at an annual capacity factor of 83.7 percent. If not, please provide updated capacity factors in the form of a before-and-after compliance table. Please provide the operating range in megawatts of the facility before and after compliance.***

Successful implementation of Track 2 will not affect the operating range in megawatts (i.e., 0 - 510 MW) of either Moss Landing Unit 1 or Unit 2.

At this time, DML anticipates that successful implementation of Track 2 for Moss Landing Units 1 and 2 would not impact the annual capacity factor of the Units. While Track 2 implementation will reduce intake water flows from the maximum permitted flows, the Units can, based on operating experience, achieve a 100% capacity factor with the anticipated reduced water flows. As additional context, the annual actual average capacity factor of Units 1 and 2 over the past five years is approximately 37.4 percent.

Presented in the form of a before-and-after compliance table:

<b>Moss Landing</b>	<b>Capacity Factor Before Track 2 Compliance</b>	<b>Capacity Factor After Track 2 Compliance</b>
Unit 1	100%	100%
Unit 2	100%	100%

<b>Moss Landing</b>	<b>Operating Range Before Track 2 Compliance – Megawatts</b>	<b>Operating Range After Track 2 Compliance – Megawatts</b>
Unit 1	0 - 510	0 - 510
Unit 2	0 - 510	0 - 510

5. ***Dynegy has indicated that all construction for implementation of measures to achieve Track 2 compliance are expected to be performed during normally scheduled maintenance outages and that no dual unit outages are expected to be necessary to achieve Track 2 compliance. Have there been any changes to the construction schedule since Dynegy's January 5, 2017 letter? If so, please describe whether and how these changes would affect down time at Units 1 and 2 outside of normally scheduled maintenance, including any dual unit outages.***

There have been no changes to the construction schedule since our January 5, 2017 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.

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

No.

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

Sincerely,



REX A. LEWIS  
Managing Director Plant Operations  
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