

NRG Comments on the current draft of the new Section 22

Section a; section (j)(2)(H): NRG is disappointed with the removal of the startup and shutdown provisions in the previous version, as they would have allowed us considerable compliance flexibility. For EGUs that serve a peaking function, the startup and shutdown time can be a significant portion of a 24-hour averaging period. Additional consideration of other measures including extending the averaging time to 30 days or; allowing DERC production to continue during Phase 1; or increasing the Phase 1 limits to compensate for the removal of the startup/shutdown provisions might be warranted.

Section (g)(4)(A) and (g)(4)(B): NRG would like more specific language stating that installing and operating water injection on a simple-cycle combustion turbine is RACT. While NRG does not disagree that the system shall be designed to comply with the referenced limits, experience has shown that often there is a discrepancy between design and as built performance. With no other emission reduction technology reasonably available, water injection must be considered RACT. Please see the proposed revisions below:

(A) To comply with the Phase 1 non-ozone season emissions limitation, install and operate water injection technology designed to comply with the Phase 1 ozone season limitation. Water injection technology, **which is considered RACT for simple cycle turbines**, shall be operated at all times the simple cycle combustion turbine is operating;

(B) To comply with the Phase 2 non-ozone season emissions limitation, install and operate water injection technology designed to comply with the applicable Phase 2 emissions limitation in subparagraph (C) of subdivision (4) of subsection (d). Water injection technology, **which is considered RACT for simple cycle turbines**, shall be operated at all times the simple cycle combustion turbine is operating;

Testing: MRC flexibility. NRG strongly disagrees with Enforcement's assessment at the July 1st "testing language meeting" that limiting MRC to an input-based measurement eases compliance by providing consistency. Especially where simple-cycle turbines are concerned, an output-based measurement – what was accepted by the CT DEEP for some 20+ years – is a much simpler method of measuring MRC. The unit output varies very little with temperature and requires no graphs or equations to determine compliance.