



## State Water Resources Control Board

September 18, 2013

Mr. George L. Piantka  
NRG Energy  
5790 Fleet Street  
Carlsbad, CA 92008

Dear Mr. Piantka:

### INFORMATION REQUIREMENTS FOR EL SEGUNDO GENERATING STATION

On November 30, 2010 a letter was sent out by the State Water Resources Control Board's (State Water Board) Executive Director requiring the submittal of an Implementation Plan (Plan) by April 1, 2011. The letter outlined the required information to include in the Plan, including information on planned actions for compliance with the Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (Policy). If final compliance by October 1, 2015, is not feasible, interim mitigation measures must be identified in the Plan.

Due to the current uncertainty as to conditions identified in implementation plans previously submitted from the Once-Through Cooling (OTC) power plants with a near term compliance deadline, further information and data input is necessary to conduct grid reliability analysis to determine the impact on local and system reliability.

Pursuant to the Policy and California Water Code section 13383, the State Water Board requires NRG to provide the most current information for El Segundo Generating Station in the previously-submitted Plan if the following content is not up-to-date or is inaccurate:

1. What mechanism is being used to bring this unit into compliance?

The final compliance date for Units 3 and 4 is December 31, 2015. Since May 2013, NRG has already replaced Unit 3 with the El Segundo Energy Center (ESEC), which consists of two combined cycle facilities, each with a one-one-one design (i.e., one combustion turbine and one steam turbine) using dry air cooling technology (Units 5, 6, 7 and 8), totaling 580 Mega Watt (MW) of aggregate capacity. The project became available for commercial operation on July 10, 2013.

NRG filed a Petition to Amend its ESEC certification with the California Energy Commission (CEC) on April 28, 2013 (Docket #: 00-AFC-14C). Based on this Petition to Amend, NRG would retire Unit 4 and build an additional 435 MW of capacity in Units 9 through 12, incremental to the 580 MW in Units 5 through 8 (built to replace Unit 3). Units 9 and 10 are

together a fast-start combined cycle with 325 MW of capacity, and Units 11 and 12 each have a 55 MW simple cycle gas turbine. Should the CEC approve this Petition to Amend, the ESEC (Units 5-12) will have total aggregate of 1,015 MW of capacity.

2. What actions have been taken to obtain permits, obtain contracts or meet other regulatory obligations to implement the compliance mechanism identified above?

The existing 580 MW ESEC (Units 5-8) is licensed by the CEC (Docket 00-AFC-14C) to replace Unit 3, and has a Permit to Construct/Temporary Permit to Operate from Southern California Air Quality Management District, as Facility: 115663. As explained above, NRG has filed a Petition to Amend this certification to build an additional 435 MW of capacity to replace Unit 4 with units 9 through 12.

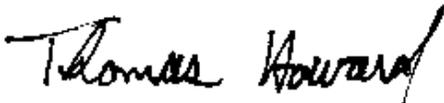
3. Are retirements covered by California Public Utilities Commission's (CPUC) authorized procurements?

The CPUC's 2012 Long-Term Procurement Plan Track 1 Decision (D.)13-02-015 authorized the procurement of between 1,400 and 1,800 MW of electrical capacity in the Los Angeles Basin to meet reliability needs after the retirement of all once-through cooling generation in the local area, including El Segundo Generating Station Units 3 and 4.

Submission of the above information is required no later than 60 days after the date of this letter.

Should you have any questions on this matter please feel free to contact Mr. Jonathan Bishop, Chief Deputy Director, at (916) 341-5820 ([jsbishop@waterboards.ca.gov](mailto:jsbishop@waterboards.ca.gov)) or Dr. Maria de la Paz Carpio-Obeso, Chief of the Ocean Unit, at (916) 341-5858 ([mcarpio-obeso@waterboards.ca.gov](mailto:mcarpio-obeso@waterboards.ca.gov)).

Sincerely,



Thomas Howard  
Executive Director

ECM# 1085024