

ENVIRONMENTAL ENERGY ALLIANCE OF NEW YORK
677 Broadway, Suite 1205
Albany, New York 12207-2996



November 16, 2019

Via email at: ozone@otcair.org

Ozone Transport Commission
800 Maine Avenue SW
Suite 200
Washington, DC 20024

Re: Ozone Transport Commission (OTC) Recommendation for Establishing Daily Limits for Coal-Fired Electric Generating Units (EGUs) in Pennsylvania (PA) to Ensure that Existing Control Technologies are Optimized to Minimize Nitrogen Oxide (NO_x) Emissions Each Day of the Summer Ozone Season

Dear Members of the OTC,

I write on behalf of the Generation Committee members of The Environmental Energy Alliance of New York, LLC (the "Alliance"; see list of members supporting this letter highlighted below) in response to the OTC request for comments on the above-referenced recommendation. The Alliance is an ad hoc, voluntary group of electric generating companies, transmission/ distribution companies and other providers of energy services in New York State (NYS). The Alliance supports the efforts of its members in understanding state and national environmental regulatory initiatives in order to permit them to more effectively formulate and achieve their business goals and proactively advocate cost-effective regulations and policies. The operations of Alliance members contribute to the reliability of the State's electric grid and to the economic well-being of NYS.

The OTC proposes to establish daily emissions control technology optimization requirements and daily NO_x emission limits at coal-fired EGUs in PA. The OTC may submit the recommendation to the Environmental Protection Agency (EPA) under Clean Air Act (CAA) Section 184(c) after review of public comments received on the proposal. The Alliance fully supports the proposed recommendations for more stringent NO_x controls for EGUs in PA for the reasons that follow.

Daily emissions limits and Reasonably Available Control Technology (RACT) for NO_x have been required of EGUs for NO_x in NYS since 1995. These regulations have been periodically updated (in 1999, 2004, 2010, 2016, 2019) to align with advances in control technology. Additional reductions will occur with the "peaking unit" rule to control ozone season NO_x for simple cycle and regenerative combustion turbines, soon to be issued as a final rule. NYS EGUs NO_x emission rates have been reduced 87 percent since 2003 and are among the lowest in the country. In comparison, [eGRID data for 2016](#) clearly show the NO_x rate for PA is double that for NYS for the ozone season, and nearly three times the annual average rate. EGUs in NYS

*Central Hudson Gas & Electric Corporation
Consolidated Edison Company of New York, Inc.*
Dynergy Power, LLC
Eastern Generation*
Helix Ravenswood, LLC*
National Grid*
New York Power Authority**

*New York State Electric & Gas Corporation
NRG Energy, Inc.*
Orange & Rockland Utilities, Inc.
PSEG Long Island
Rochester Gas & Electric Corporation
Roseton Generating, LLC**

have operated with daily limits, and continuously operate control equipment to meet stringent emissions limits for many years; Alliance members consider it reasonable to expect EGUs operating in other states to do the same.

Further, despite the significant reductions of emissions by in-state EGU, the New York Metropolitan Area (NYMA) was designated on June 4, 2018 (effective August 3, 2018) as a moderate nonattainment area for the 2015 National Ambient Air Quality Standard (NAAQS). Modeling by the NYS Department of Environmental Conservation staff identified sources from a number of states (including PA) as interfering with attainment or maintenance of the 2008 and 2015 ozone NAAQS for the NYMA. Requiring the same operating requirements to control emissions of upwind sources that significantly contribute to nonattainment and interfere with maintenance in NYS will further our ozone attainment obligations. Stated simply, though the basis for the proposed action is to ensure the areas of the OTR achieve attainment with NAAQS for ozone by CAA-mandated dates, reductions in PA emissions are absolutely critical to achieving NAAQS attainment in the NYMA.

In summary, Alliance members support the OTC recommendation to EPA that requires daily emissions limits and continuous operation of controls for EGUs in PA, or any other state within the region. EGUs in NYS have operated as such for many years and such requirements should be considered standard operation in all states.

Alliance members appreciate the opportunity to comment on the proposal.

Sincerely,

A handwritten signature in cursive script that reads "Sandra Meier".

Sandra Meier, Ph.D.
Director, Generation Services
Sandra.Meier@eeanyweb.org

cc: J. Snyder, NYSDEC
R. Sliwinski, NYSDEC
M. Sheehan, NYSDEC
R. Bielawa, NYSDEC