

DOCKETED	
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Project Title:	Emission Performance Standard
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Description:	N/A
Filer:	Sean Neal
Organization:	Duncan, Weinberg, Genzer & Pembroke, P.C.
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Via Overnight Mail and Electronic Mail

August 27, 2025

California Energy Commission
EPS Compliance
715 P Street
Sacramento, CA 95814
Attention: Compliance Filing
EPS@energy.ca.us

Re: SB 1368 Emission Performance Standards Compliance Filing for the Power County Power Project Power Sales Contract

Pursuant to California Code of Regulations (CCR) 20 CCR § 2909, please be advised that the Truckee Donner Public Utility District (TDPUD) at a publicly noticed meeting, approved and authorized execution and delivery of the Power County Power Project Sales Contract (Agreement) with Utah Associated Municipal Power Systems (UAMPS) for natural gas generation on January 15, 2025, which was authorized as fully executed on August 13, 2025.

The Agreement information is as follows:

Name of Counterparty: Utah Associated Municipal Power Systems (UAMPS)

Facility Name: Power County Power Project

Facility Location: Power County, Idaho

Technology/Fuel: Natural Gas consisting of a combined cycle generator.

Nameplate Capacity of Facility: A design capacity of at least 360 MW in capacity, of which 5.25 MW will be delivered to TDPUD.

Product Description: The product output is the amount of electricity which is actually generated by the Project in any particular hour.

Substitute energy allowed: Substitute energy from other projects of UAMPS or the UAMPS Pool is permitted under the Agreement in the event of interruption or reduction in case of emergencies affecting the Project, or in order to make repairs and replacements to, to make investigations and inspections of, or to perform maintenance work on the project, or is otherwise



unavailable due to an Uncontrollable Force, or is interrupted or curtailed by the balancing authority area or other transmitting utility. Accordingly, the Contract complies with 20 CCR § 2906(b).

Delivery Start Date: The intended Commercial Operation Date for the plant is July 1, 2031.

Delivery End Date: Ongoing until Project decommissioning at the earliest.

Consistent with the TDPUD Board's approval at its public meeting on January 15, 2025, TDPUD is making this compliance filing requesting the California Energy Commission (Commission) find that this natural gas-powered energy contract is compliant with the Greenhouse Gases Emission Performance Standards (EPS) set forth in 20 California Code of Regulations (CCR) § 2900, *et seq.* and, more specifically, 20 CCR § 2903(a). As required by 20 CCR § 2909(b), specified information required under 20 CCR § 2908(b) is attached to this compliance filing.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Carpenter", written over a horizontal line.

Jared Carpenter

Electric Utility Director

Truckee Donner Public Utility District



California Energy Commission Emission Performance Standards Compliance Filing

The Truckee Donner Public Utility District (TDPUD) is asking that the California Energy Commission (Commission) find that the Power County Power Project Sales Contract (Agreement) with Utah Associated Municipal Power Systems (UAMPS) is compliant with the greenhouse gases emissions performance standard set forth in Chapter II of Title 20 of the California Code of Regulations. Specifically, TDPUD asserts herein that the facility under contract is compliant pursuant to Section § 2903(a) of the regulations. Substitute energy is permitted under the Agreement only for conditions set forth in Section § 2906(b)(2)(A).

I, the official named below, certify under penalty of perjury, the following:

1. The TDPUD Board of Directors has reviewed and approved in a noticed public meeting both the covered procurement and the compliance filing;
2. Based on TDPUD's knowledge, information or belief, the compliance filing does not contain a material misstatement or omission of fact;
3. Based on TDPUD's knowledge, information or belief, the covered procurement complies with this Article; and
4. The covered procurement described above contains contractual terms or conditions specifying that TDPUD will not have received Required Approvals and therefore must exit the Agreement if the Commission does not approve TDPUD's compliance filing for this Agreement upon receipt of a report from UAMPS that makes a final selection of the technology for and before the commencement of construction of the power plant.

A handwritten signature in black ink, appearing to read "Jared Carpenter", written over a horizontal line.

Jared Carpenter
Electric Utility Director
Truckee Donner Municipal Utility District

Date: 8/27/25



Attachment

Documentation for the Covered Procurement under CCR § 2908(b)(3)

The Truckee Donner Public Utility District (TDPUD) has authorized execution of the Power County Power Project Sales Contract (Agreement) with Utah Associated Municipal Power Systems (UAMPS). The Agreement provides for the purchase of power from UAMPS produced by a combined cycle natural gas generating plant to be developed and located in Power County, Idaho.

Although TDPUD will not own the facility, TDPUD provides the Commission with information pertaining to the project as a "new ownership investment," as defined under California Code of Regulations (CCR) Title 20 § 2901(j), and TDPUD provides the following information requested under 20 CCR § 2908(b)(4). For further information, please refer to Exhibit A to this attachment:

(A) For New Construction or Purchase of an Existing Generating Unit or Powerplant, a Description and Identification of the Planned Powerplant or the Purchased Asset Specifying the Power Generating Equipment, Power Source, Such as Fuel Type, Wind, or Biomass, all Supplemental Fuel Sources, and all Available Historical Production and Fuel Use Data:

The facility will include construction and installation of a natural-gas, combined cycle electric generating powerplant with a design capacity of at least 360 MW, 5.25 MW of which will be made available for sale to TDPUD.

It is intended that the powerplant will operate as baseload load at an annualized plant capacity factor of greater than 60 percent, as defined under 20 CCR § 2901(b). The generating plant will be developed and located in Power County, Idaho. As the plant has yet to be developed, with an intended Commercial Operation Date within calendar year 2031, and no historical production or fuel use data is available.

Substitute energy from other projects of UAMPS or the UAMPS Pool is permitted under the Agreement in the event of interruption or reduction in case of emergencies affecting the Project, or in order to make repairs and replacements to, to make investigations and inspections of, or to perform maintenance work on the project, or is otherwise unavailable due to an Uncontrollable Force, or is interrupted or curtailed by the balancing authority area or other transmitting utility. Accordingly, the Contract complies with 20 CCR § 2906(b).

(B) Description of Incremental Investment: Non-applicable, as the investment is not a modification to an existing powerplant.



(C) For Non-Renewable Resources, the Heat Rate or Carbon Dioxide Emissions Profile of the Powerplant and the Source of this Information: Although the exact technology has not been selected by UAMPS for the power generation facility, the projected combined-cycle power plant will meet the carbon dioxide emissions profile and meet the Emission Performance Standard (EPS) under 20 CCR § 2902(a) of 1100 pounds (0.5 metric tons) of carbon dioxide per megawatt hour (MWh) of electricity and as determined per 20 CCR § 2903(a) “by dividing the powerplant’s annual average carbon dioxide emissions in pounds by the powerplant’s annual average net electricity production in MWh,” with such determination “based on capacity factors, heat rates, and corresponding emissions rates that reflect the expected operations of the powerplant and not on full load heat rates.” The three candidate technologies are described in Exhibit A to this attachment.

To the extent that the California Energy Commission analyzes TDPUD’s compliance filing as a “covered procurement”, under 20 CCR § 2908(b)(3), TDPUD provides the following information.

(A) A Description of the Terms of the Contract and Option(s) to Extend the Contract: The Agreement approved by the TDPUD Board of Directors was reflected in the January 15, 2025 Board minutes found at:

<https://web.tdpud.org/WebLink/DocView.aspx?id=353700&dbid=0&repo=TDPUD>. The agenda item and Board memo for the Power Sales Contract’s consideration at the January 15, 2025 TDPUD Board of Directors’ meeting can be found here:

<https://web.tdpud.org/WebLink/DocView.aspx?id=353375&dbid=0&repo=TDPUD>

The Agreement provides for the purchase of power by TDPUD from a natural gas generating plant to be developed and located in Power County, Idaho owned by UAMPS. The intended, earliest Commercial Operation Date for the plant is in calendar year 2031. The Agreement provides for the purchase of power from a natural gas generating facility on an ongoing basis, subject to termination upon the later of several events, including termination of project agreements, the full payment of bonds, and decommissioning of the generating facility with all decommissioning costs paid. The Agreement does not contain provisions for the extension of the purchase and sale term.

(B) A Description and Identification of the Powerplant(s) Providing Energy Under the Contract, Including, but not Limited to, Power Generation Equipment and Fuel Type:

The natural gas-powered facility will include construction and installation of a combined-cycle electric generating powerplant with a design capacity of at least 360 MW, 5.25 MW of which will be made available for sale to TDPUD.

(C) A Description of the Design or Operation of the Powerplant(s) so as to Indicate Whether or not the Powerplant(s) Operates to Supply Baseload Generation:

It is intended that the powerplant will operate as baseload load at an annualized plant capacity factor of greater than 60 percent, as defined under 20 CCR § 2901(b).



(D) An Explanation as to how the Contract is Compliant with the Emission Performance Standards (EPS):

The plant will meet the EPS standard, which according to 20 CCR § 2902(a) is less than “1100 pounds (0.5 metric tons) of carbon dioxide (CO₂) per megawatt hour (MWh) of electricity” and as determined per 20 CCR § 2903(a) “by dividing the powerplant’s annual average carbon dioxide emissions in pounds by the powerplant’s annual average net electricity production in MWh,” with such determination “based on capacity factors, heat rates, and corresponding emissions rates that reflect the expected operations of the powerplant and not on full load heat rates.” The three candidate technologies are described in Exhibit A to this attachment.

(E) Supporting Documents or Information that Allow for Assessment of Compliance with the Standard, Including, but not Limited to, Staff Assessments and Reports to the Local Publicly Owned Electric Utility’s Governing Body, Planned or Historical Production and Fuel Use Data, and Applicable Historical Continuous Emissions Monitoring Data: Because the generating plant has yet to be constructed, there is no historical production and fuel use data, or continuous emissions monitoring data for the plant. However, for purposes of planned production, TDPUD intends that the facility will be operated in full compliance with the EPS and other applicable regulations. For more information, see Exhibit A to this attachment.



Exhibit A

CALIFORNIA ENERGY COMMISSION
EMISSION PERFORMANCE STANDARD COMPLIANCE FILING

DESCRIPTION OF PROPOSED UAMPS POWER COUNTY PROJECT

Name of Facility: UAMPS Power County Project

Location of Facility: 3 miles southwest of American Falls, Idaho

Proposed Technology/Fuel: Natural Gas-Fired Combined Cycle Generating Facility (CCGT)

Planned Commercial Operation Date: July 1, 2031

Generation Configuration Options:

Preliminary Rated Capacity and CO₂ emission estimates were developed from vendor data with station service loads for the UAMPS Power County project at site conditions of: 59°F, 30% RH and an elevation of 4100 ft. without evaporative inlet cooling. The combined unit output will be limited to a maximum of 400 MW Net with assumed lower winter temperatures.

Prime Mover	1 x 1 Combined Cycle	1 x 1 Combined Cycle	1 x 1 Combined Cycle
Quantity	1	1	1
Manufacturer	GE Vernova	Mitsubishi	Siemens
Model	7F.05	M501GAC	SCC6-5000F
Rated Capacity (MW)	371	350.5	388
Fuel Used	Natural Gas	Natural Gas	Natural Gas
EPS Compliant	Yes	Yes	Yes
Expected Operating Profile	See Figure 3	See Figure 3	See Figure 3
Expected energy output (MWh)	See Figure 3	See Figure 3	See Figure 3
Expected fuel use profile	See Figure 4	See Figure 4	See Figure 4
Estimated CO ₂ emissions for site conditions, (lbs/MWh)	809.3	800.6	824.7

Figure 1 Potential Generation Configuration Options

Power Purchase Contract Terms

Name of Counter Party: Utah Associated Municipal Power Systems (UAMPS)

Length of Power Sales Contract: Life of Facility (Assumed at least 30 years)

Duration: July 1, 2031 – June 30, 2061



Product: Electricity (MWh)

Capacity for Project: 364 MW¹

Capacity for Participants: Below in Figure 2, is the subscribed generation entitlement for each Participant under the Power Sales Contracts.

CALIFORNIA PURCHASERS		
PURCHASER	SHARE TO BE DELIVERED	SHARE OF 364 MW
Lassen	1.94%	7.05
Truckee Donner	1.44%	5.25
GROUP TOTAL	3.38%	12.3
UAMPS MEMBERS		
GROUP TOTAL	58.43%	212.7
UMPA MEMBERS		
GROUP TOTAL	17.58%	64
INTERESTED 3 rd PARTY		
GROUP TOTAL	20.60%	75
PURCHASER TOTAL	100%	364

Figure 2 Generation Ownership Distribution

Expected Deliverables: Please refer to Figure 2

Must Take Provisions: Please refer to Figure 2

Dispatch Provisions: It is assumed that UAMPS will be responsible as the Operating Agent for the Power County Facility. This includes all aspects of the project, including: scheduling, dispatch and availability and the unit will be utilized based on Participant and members system demand.

Unit Contingency: N/A.

Expected Operating Profiles

A simulation of the load profile performed by UAMPS staff is below in Figure 3 utilizing a Combined Cycle configuration. All OEM (Original Equipment Manufacturer) options will follow similar profiles as the heat rates and other characteristics are comparable. The load profile was used to derive the average estimated energy output per year as shown below:

¹ The Project size per the Participation Agreement is limited to 364 MW Net, but may generate under colder temperatures up to 371 MW Net. The Generation scenarios listed are based on the Net generation as the project electrical delivery will be limited by the interconnection with the transmission provider.



Energy Output (MWh): 1,818,486 Mwh

The average annual capacity factor for all manufacturers is 70.08%

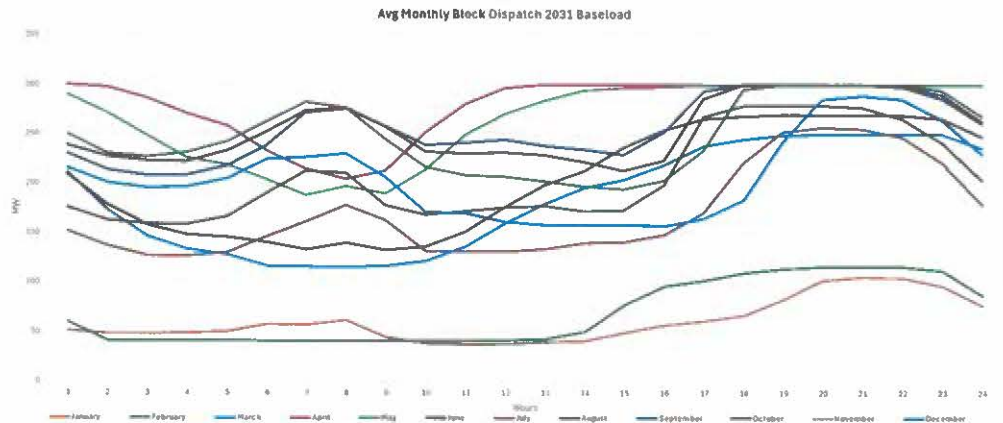


Figure 3 Average Monthly Block Dispatch

Expected Fuel Use Profile:

Below is the preliminary fuel use data received from each respective vendor, estimated for the UAMPS Power County generator site conditions.

GE - Estimated CCGT Data for Power County Base Load – Summer (90 deg F) All data estimated for site conditions, no inlet cooling and air cooled condensers					
Duct Burner		Off	On	Off	Off
Load		100%	100%	80%	60%
Net Unit Output	MW	289.61	343.4	233.46	184.61
Heat Input (LHV)	MMBTU/kWh	5.857	6.174	5.954	6.156
CO2 Emissions	Lbs/MW	784.5	826.8	797.4	824.0

Figure 4 GE Fuel Use Profile (from vendor data)

Mitsubishi - Estimated CCGT Data for Power County Base Load - Summer (90 deg F)
All data estimated for site conditions, no inlet cooling and air cooled condensers

Duct Burner		On	On	Off
Load		100%	75%	56%
Net Unit Output	MW	310.6	242	194.96
Heat Input (LHV)	MMBTU/h	6.252	6.388	6.765
CO2 Emissions	lbs/MWh	747.3	757.0	937.1

Figure 5 Mitsubishi Fuel Use Profile (from vendor data)

Siemens - Estimated CCGT Data for Power County Base Load - Summer (90 deg F)
All data estimated for site conditions, no inlet cooling and air cooled condensers

Duct Burner		ON	OFF	OFF	OFF
Load		100%	100%	75%	50%
Net Unit Output	MW	298.1	362	232.2	171.5
Heat Input (LHV)	MMBTU/h	6.062	6.451	6.303	6.795
CO2 Emissions	lbs/MWh	824.4	877.2	857.1	924

Figure 6 Siemens Fuel Use Profile (from Vendor data)