

**Felicia Miller - RERC 3&4 - Additional ERC Purchase Information (113560)**

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**From:** <mtatterson@powereng.com>  
**To:** <WWalters@aspeneg.com>, <Fmiller@energy.state.ca.us>  
**Date:** 8/12/2008 7:14 AM  
**Subject:** RERC 3&4 - Additional ERC Purchase Information (113560)  
**CC:** <dtateosian@powereng.com>, <BGill@riversideca.gov>, <klany@scec.com>, <allanori@comcast.net>, <Dfine@riversideca.gov>, <harry.hall@powereng.com>, <whitney.mereness@powereng.com>

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Hello Will and Felicia:

Below is further explanation of our rationale for VOC offsets. I would be happy to arrange a conference call with Karl Lany and myself if further clarification is needed.

Because VOC offsets are required to mitigate pursuant to CEQA, but not pursuant to new source review, RPU followed the same procedures that were used for RERC Units 1 and 2. Specifically, to determine the amount of daily VOC offsets, we divided annual emissions by 365 days.

The annual potential VOC emissions from RERC Units 3 and 4 is 1.55 tons so offsets (lb/day) =

$1.55 \text{ tons/yr} \times 2000 \text{ lb/ton} / 365 \text{ day/yr} = 8.5 \text{ lb/day}$

Kindest Regards,

Mike Tatterson  
 RERC Permitting Lead  
 POWER Engineers, Inc.

<b>DOCKET</b>	
08-SPPE-1	
<b>DATE</b>	AUG 12 2008
<b>RECD.</b>	AUG 12 2008

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**From:** WWalters@aspeneg.com [mailto:WWalters@aspeneg.com]  
**Sent:** Monday, August 11, 2008 12:10 PM  
**To:** Michael Tatterson 3641  
**Cc:** 'Felicia Miller'; 'Keith Golden'  
**Subject:** RE: RERC 3&4 - ERC Purchase Information (113560)

Mike,

The PM and NOx explanations are clear. However, the rationale for the VOC ERC is not clear as it does not match the description in the application. Can you provide more rationale for VOC. Thanks,

Will

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**From:** mtatterson@powereng.com [mailto:mtatterson@powereng.com]  
**Sent:** Monday, August 11, 2008 9:29 AM  
**To:** WWalters@aspeneg.com; Fmiller@energy.state.ca.us  
**Cc:** dtateosian@powereng.com; BGill@riversideca.gov; klany@scec.com; whitney.mereness@powereng.com; allanori@comcast.net; Dfine@riversideca.gov; harry.hall@powereng.com

**Subject:** RERC 3&4 - ERC Purchase Information (113560)

Hello Will and Felicia:

Please see our responses to Will's requested information on RPU's purchase of ERCs. Call me at 208-890-3576 if you have any questions.

Kindest Regards,

Mike Tatterson  
RERC 3&4 Permitting Lead  
POWER Engineers, Inc.

In response to: 1) A brief description of the change in the offset proposal. Essentially the why and what of the changes.

There is not any substantial change in offset strategy.

Rule 1309.1 always required RPU to exercise due diligence in obtaining PM10 credits in the market. RPU did so and by obtaining the 36 lbs of offsets that were identified to be required in the application, RPU will not have to request the priority reserve credits from SCAQMD. RPU also purchased NOx and VOC credits in accordance with the application.

In response to: 2) A list of the ERCs per pollutant giving the following: A) certificate number; B) amount; C) location of reduction; D) method of reduction (controls, shutdown, etc.); and E) date of reduction.

Information on Item D, method of reduction, is not readily available. The following table provides the remaining requested information.

**EMISSION REDUCTION CREDIT INFORMATION**

ERC	Certification #	ERC Amount (lb/day)	Year
PM-10			
	AQ000218	2	6/3/91 and all subsequent years
	AQ007850	20	2008
	AQ007851	20	2009
	AQ007852	20	2010
	AQ007853	20	2011
	AQ007854	20	2012
	AQ007855	20	2013
	AQ007856	20	2014
	AQ007857	20	2015 and all subsequent years
	AQ007813	7	2008
	AQ007814	7	2009

	AQ007815	7	2010
	AQ007816	7	2011
	AQ007817	7	2012
	AQ007818	7	2013
	AQ007819	7	2014
	AQ007820	7	2015 and all subsequent years
	AQ006800	7	2008
	AQ006802	7	2009
	AQ006804	7	2010
	AQ006806	7	2011
	AQ006808	7	2012
	AQ006810	7	2013
	AQ006812	7	2014 and all subsequent years
NOX	Acct. #700128	13,720 lbs/year	2009 and all subsequent years
ROG	AQ007615	9	3/4/2008

NOTE: Location of all ERC's is the Inland Empire.