

10-035-124/Rocky Mountain Power
May 25, 2011
DPU Data Request 36.3

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Plant Additions: Pollution Control

What are the estimated reductions in SO₂ emissions (on a unit and total plant basis) from the projects listed in the Company's response to UAE 3.3? What were the actual SO₂ emissions (on a unit and total plant basis) before the projects are/were placed into service and what are the expected emissions (on a unit and total plant basis) after the projects go/went into service.

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Please refer to Attachment DPU 36.3, in which two tables are provided. Table 1 identifies the historic (2000-2010) SO₂ emissions as well as the projected future emissions (2011-2020). Emissions occurring prior to the completion of a specific scrubber project are highlighted in bold blue font. The total emissions by plant are shown below the annual emissions from each of the individual units.

The sulfur content of the Utah coal supply is expected to increase significantly over the next few years. As an example, the sulfur content of the fuel used in Table 1 to project future SO₂ emissions increases from a low of 0.42% in 2009 to over 0.83% in 2014. The Huntington fuel sulfur content increases from 0.49% in 2009 to over 0.72% in 2015. Table 2 has been developed to identify the SO₂ emission increases that would have resulted from fuel sulfur content increases, but are avoided by upgrading the scrubbers at these particular units. Table 2 projects the future SO₂ emissions assuming the Hunter 1, Hunter 2 and Huntington 1 scrubber upgrades were not completed and that the Regional Haze program would allow the operation of the affected units at emission limits significantly higher than presumptive BART. In creating this table several unrealistic assumptions must be made:

1. The regional haze program, EPA, and the state of Utah would find it acceptable to increase the SO₂ emissions above the historic emissions at these facilities.
2. The existing equipment would not require significant upgrades in order to achieve the required 86% removal rate that would be required in order to meet the historic permit limit of 0.21 lb/MMBtu.
3. Upgrades/replacements of the reagent facility or waste handling systems would not be required.

For the Hunter and Huntington units, the SO₂ benefits consist of both the actual annual reduction in annual SO₂ emissions from their historic emissions as well as

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the avoided increases in SO₂ emissions that would have occurred due to the fuel sulfur content had the upgrades not been completed.