

Meeting with utilities re: EPA's final Affordable Clean Energy rule
9/26/19
GEF2, Room G09, 1-3 pm

AGENDA

The Affordable Clean Energy (ACE) rule was finalized by EPA on July 8, 2019 and is effective as-of September 9. The rule affects 14 electrical generating units at 8 facilities in Wisconsin. The purpose of this meeting is to review the rule's planning timelines and requirements, obtain affected utility perspectives on the final rule, and hear any questions or concerns that they may have at this time.

1:00 – 1:10 Welcome/introductions

1:10 – 1:25 Review purpose of meeting

Brief summary of ACE rule key provisions, processes and dates (DNR)

1:25 – 2:50 Dialogue/discussion with utilities

Discussion questions:

- What questions or clarifications are there regarding rule timelines or requirements?
- Are the units listed on reverse the ones meeting EPA's criteria for affected facilities?
- Are there preferences as to how utilities would prefer DNR to engage with them on developing standards of performance for their affected units? Does this change for utilities with a multi-state presence?
- What specific challenges do you see when it comes to this rule, especially when it comes to setting the standard of performance?
- What else should DNR be thinking about now as it goes about developing a process to implement this rule?

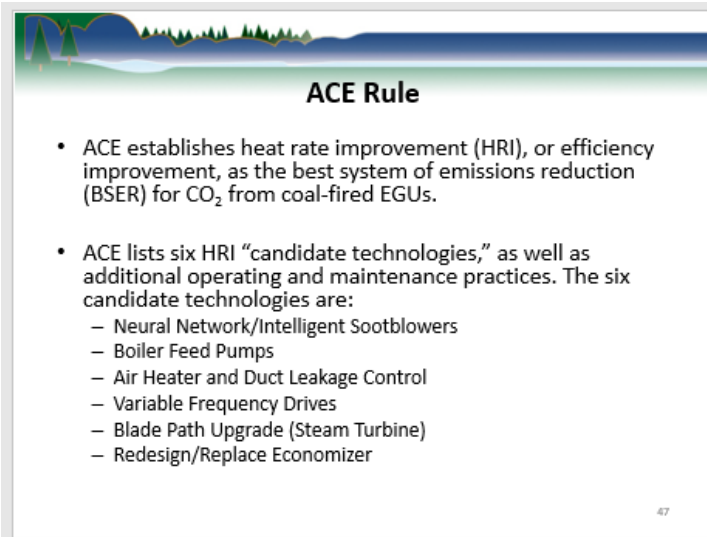
Other questions or issues that utilities wish to discuss

2:50 – 3:00 Wrap up and summary of any follow-up items (DNR)

Key ACE Rule implementation dates:

Date	Milestone	Comment
July 8, 2019	Final rule published	
Sept 8, 2019	Rule effective	
July 8, 2022	State plan due	3 years from publication of final rule. Public comment required on draft plan prior to submittal
	EPA completeness determination	Due NLT 6 months from state plan submittal
	EPA action on state plans	Due NLT 12 months from completeness determination
July 8, 2024	Compliance schedule for affected EGUs begins (assumes plan submittal on July 8, 2022)	Must initiate within 24 months after plan submittal
	EPA promulgates federal plan (if necessary)	2 years from finding of failure to submit state plan, or disapproval of a submitted plan

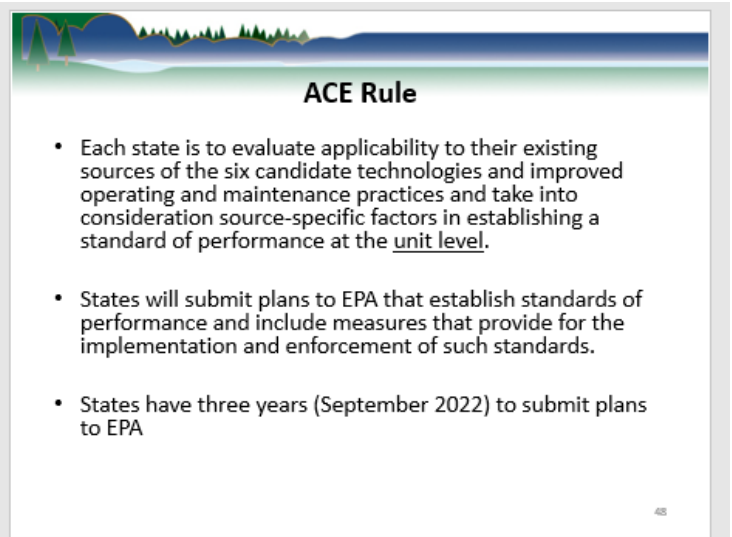
Background slides from the Air Management Study Group meeting, August 8, 2019:



ACE Rule

- ACE establishes heat rate improvement (HRI), or efficiency improvement, as the best system of emissions reduction (BSER) for CO₂ from coal-fired EGUs.
- ACE lists six HRI “candidate technologies,” as well as additional operating and maintenance practices. The six candidate technologies are:
 - Neural Network/Intelligent Sootblowers
 - Boiler Feed Pumps
 - Air Heater and Duct Leakage Control
 - Variable Frequency Drives
 - Blade Path Upgrade (Steam Turbine)
 - Redesign/Replace Economizer

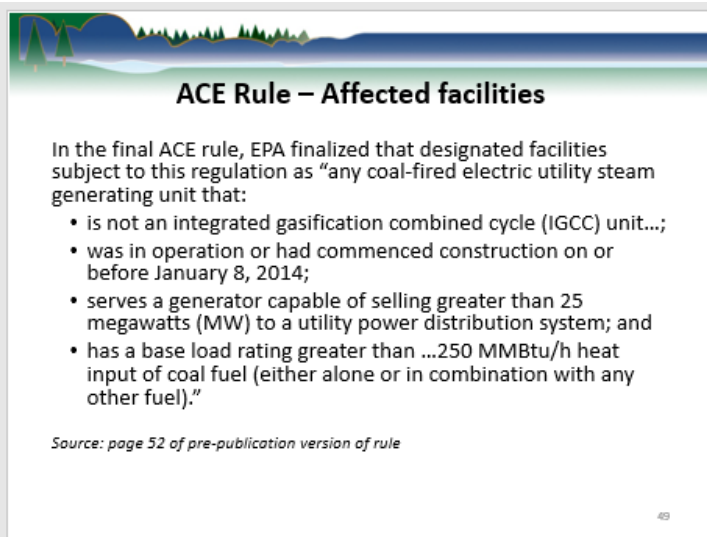
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ACE Rule

- Each state is to evaluate applicability to their existing sources of the six candidate technologies and improved operating and maintenance practices and take into consideration source-specific factors in establishing a standard of performance at the unit level.
- States will submit plans to EPA that establish standards of performance and include measures that provide for the implementation and enforcement of such standards.
- States have three years (September 2022) to submit plans to EPA

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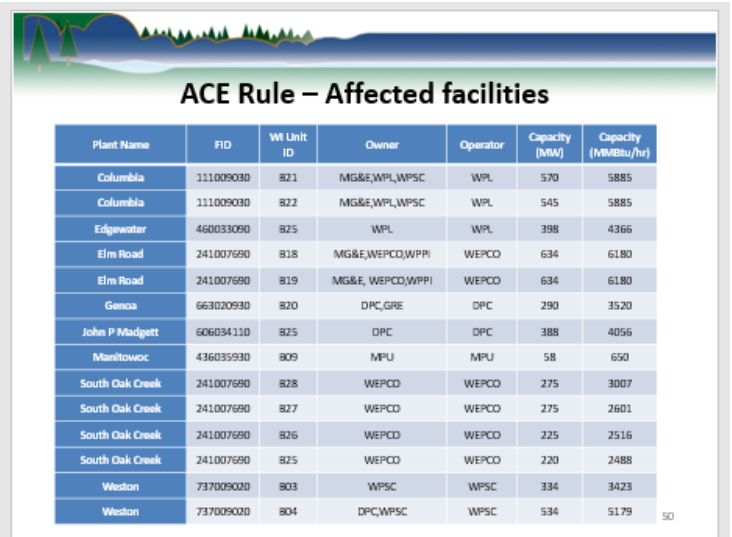
ACE Rule – Affected facilities

In the final ACE rule, EPA finalized that designated facilities subject to this regulation as “any coal-fired electric utility steam generating unit that:

- is not an integrated gasification combined cycle (IGCC) unit...;
- was in operation or had commenced construction on or before January 8, 2014;
- serves a generator capable of selling greater than 25 megawatts (MW) to a utility power distribution system; and
- has a base load rating greater than ...250 MMBtu/h heat input of coal fuel (either alone or in combination with any other fuel).”

Source: page 52 of pre-publication version of rule

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ACE Rule – Affected facilities

Plant Name	FID	WT Unit ID	Owner	Operator	Capacity (MW)	Capacity (MMBtu/hr)
Columbia	111009030	821	MG&E,WPL,WPSC	WPL	570	5885
Columbia	111009030	822	MG&E,WPL,WPSC	WPL	545	5885
Edgewater	460033090	825	WPL	WPL	388	4366
Elm Road	241007690	818	MG&E,WEPCO,WPPPI	WEPCO	634	6180
Elm Road	241007690	819	MG&E, WEPCO,WPPPI	WEPCO	634	6180
Genoa	663020930	820	DPC_GRE	DPC	290	3520
John P Madgett	606034110	825	DPC	DPC	388	4056
Manitowoc	436035930	809	MPLU	MPLU	58	650
South Oak Creek	241007690	828	WEPCO	WEPCO	275	3007
South Oak Creek	241007690	827	WEPCO	WEPCO	275	2601
South Oak Creek	241007690	826	WEPCO	WEPCO	225	2516
South Oak Creek	241007690	825	WEPCO	WEPCO	220	2488
Weston	737009020	803	WPSC	WPSC	334	3423
Weston	737009020	804	DPC,WPSC	WPSC	534	5179

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