Wheelabrator Norwalk Energy Co. Inc.
A Waste Management Company
11500 Balsam Street
Norwalk, CA 90650

September 11, 2014

Clerk of the Board California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, California 95812

Electronically submitted at: http://www.arb.ca.gov/lispub/comm/bclist.php

Subject: Proposed Amendments To The Regulation For The Mandatory Reporting Of Greenhouse Gas Emissions *Amend Division 3, Chapter 1, Subchapter 10, Article 2, Sections 95101, 95102, 95103, 95104, 95111, 95112, 95113, 95114, 95115, 95119, 95121, 95122, 95124, 95130, 95131, 95132, 95133, 95152, 95153, 95156, 95157, And Appendix A, Title 17 California Code Of Regulations*

Dear California Air Resources Board:

On behalf of Wheelabrator Technologies, Inc., I am submitting comments on the Proposed Amendments (Amendments) to the Regulations For The Mandatory Reporting of Greenhouse Gas Emissions (MRR) CARB issued July 29, 2014 for public comment. We appreciate the opportunity to submit these comments on the Amendments and in particular Sections 95112 with regard to Additional Reporting Requirements for Legacy Contract Applicants.

Wheelabrator's Norwalk Energy power plant is a legacy contract holder that is a combined cycle generation facility producing energy through three different processes. Natural gas powers a 27-megawatt LM2500 gas turbine to produce electricity that is sold to Southern California Edison in accordance with a Power Purchase Agreement executed in 1988. The facility's turbine's exhaust gasses are directed to a heat recovery steam generator (HRSG), where it heats water. The steam from that process turns a second turbine, which also produces electricity. Steam from the HRSG, or the auxiliary boilers when the turbine is not operating, is also provided flows through a pipeline to the neighboring state hospital campus where it is used for heating. In addition to electricity and steam, Wheelabrator's Norwalk Energy facility also provides chilled water to the state hospital for space cooling, using three 1,500-ton chillers. Two of the chillers are electrical and the third is an absorption chiller which uses steam from the HRSG.

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Wheelabrator's Norwalk Energy facility provides electrical power to Southern California Edison under a 30-year Power Purchase Agreement (PPA) executed on February 14, 1988. The PPA does not provide an explicit means of cost recovery for the facility's compliance with the California C&T Program and meets the definition of a legacy contract. Similarly, the Norwalk Energy facility contract with its thermal customer meets the definition of a legacy contract.

With regard to the proposed Amendments, we wish to point out that the process flow diagram for the Norwalk Energy facility is not necessarily a simple document, given Norwalk's combined cycle technology that provides maximum system efficiency while minimizing fuel consumption and environmental impacts.

However, we understand the ARB's need for the information as described in the Amendments and generally support the proposed revisions to Section 95112, but ask for clarification on questions related to the following Sections:

1. In 95112(i)(1)(A), the plant's auxiliary boilers are not part of the cogeneration system but information from operation of these boilers is needed to demonstrate the appropriate level of legacy contract allocations. To this end, the first sentence might be clearer if it read (added language in bold), "... regardless of whether the facility operator, **or the equipment,** is itself otherwise subject to..."
2. In 95112(i)(1)(B), the phrase "by either the facility operator" seems to be incomplete. Should the word "either" be removed? Conversely, the phrase should be corrected to provide reference to the word "either".
3. In 95112(i)(1)(B), "the resulting greenhouse gas emissions as reported elsewhere under this regulation" are to be included on the diagram. Does the regulation require delineation in the diagram of individual greenhouse gas compounds including CO2, CH4, and N2O, or would emissions expressed in CO2e be sufficient? Guidance or corrected language should be added to address whether individual compounds, carbon equivalents, or both must be included on the diagram.

Thank you for your consideration of our comments.

Respectfully submitted,

Michael Burt
Western Region vice President