State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: March 23, 2011

TO: All Parties of Record & Interested Persons

FROM: Martha C. Brown, Senior Attorney, Office of the General Counsel

RE: Docket No. 110007-EI - Environmental cost recovery clause.

Please note that an informal meeting between Commission staff and parties in the above captioned docket has been scheduled for:

Tuesday, March 29, 2011 at 1:30 p.m. Gerald L. Gunter Building, Conference Room 154 Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

In compliance with the stipulation to Issue 9D approved by the Commission in Order No. PSC-11-0083-FOF-EI, Florida Power & Light Company (FPL) has requested this meeting to discuss the National Emission Standards for Hazardous Air Pollutants from Coal- and Oil-fired Electric Utility Steam Generating Units, issued March 16, 2011 (40 CFR Parts 60 and 63) and FPL's plans to comply with those proposed requirements. Attendance is not required; but all parties are welcome to attend. Staff has attached draft discovery requests regarding the proposed rules to aid in the discussion at the meeting. Parties may participate telephonically in the meeting by dialing 1-888-808-6959, Conference Code 4136206. If you have any questions about the meeting, please call Martha C. Brown at (850) 413-6187.

MCB/sh

Staff Discovery:

Docket:

No.110007-EI ECRC

Utility:

FPL

Subject: Prepared by:

Solar, ESP Jenny Wu

Date:

03/22/11

Staff's Third Set of Interrogatories:

- 39. Please refer to FPL's response to Staff's First Set of Interrogatories, No. 18.
 - (a) For the Rate Impact Table you have provided, please extend the data in each column back to the period of 2009 through 2010.
 - (b) Please provide another table, similar to the Rate Impact Table you have provided, except that it is for \$/1,000 kWH bill impact and covers the period of 2009 through 2040.
- 40. Please refer to FPL's 800 MW Unit ESPs project regarding which a stipulation has been approved by the Commission in Order No. PSC-11-0083-FOF-EI, and the EPA's proposed National Emission Standards for Hazardous Air Pollutants from Coal- and Oil-fired Electric Utility Steam Generating Units (Proposed Standards), issued March 16, 2011 (40 CFR Parts 60 and 63), for the following questions.
 - (a) On page 290 of the Proposed Standards the EPA has provided Emission Limitations for existing solid oil units: 0.0020 lb/GWh of mercury, 0.080 lb/MWh of hydrogen chloride and 2.0 lb/MWh of total particulate matter. Can each of the 800 MW units meet these emission standards without an ESP retrofit?
 - (b) In Section 6a, Availability of Hg Emission Control Options, pages 213 through 215 of the Proposed Standards, EPA commented "Activated carbon injection (ACI) is the most successful demonstrated Hg-specific control technology." On page 215 EPA also stated that ESPs and fabric filters (FF) are the most commonly applied PM control technologies, and FFs usually provide better performance than ESPs. On page 215 it also mentioned that a wet ESP (WESP) can be used for control of condensable PM. In light of this, does FPL still believe that ESPs are the best option to control the Hg and PM at the 800 MW units? Please provide the rationale for your response.