

# 111(d) STATE PLAN

- *Roadmap to achievement of state emissions performance goal (834 lbs CO<sub>2</sub>/MWh)*
- *11 required elements*
- *Includes enforceable obligations of affected entities*
- *Developed by Georgia EPD > public comment > submit to EPA*
- *IT'S NOT A SIP !!!*

## *DEFINITIONS 40 CFR 60.5820*

<b>Affected Electric Generation Unit (EGU)</b>	<p>... a steam generating unit ... or a stationary combustion turbine that meets the applicability conditions ...</p> <p>[CO2 emitters]</p>	<ul style="list-style-type: none"> <li>• Constructed before 6-8-2014</li> <li>• Size &gt; 73 MW</li> <li>• Usage &gt; 1/3 of potential usage</li> <li>• This means base-load units: coal-fired units and NG combined cycle units</li> </ul>
<b>Affected Entity</b>	<p>... an affected EGU, or another entity with obligations under this subpart for the purpose of meeting the emissions performance goal requirements in these emissions guidelines</p> <p>[CO2 emitters or reducers]</p>	<p>Has compliance obligation in plan</p> <ul style="list-style-type: none"> <li>• Affected EGU (see above)</li> <li>• Electric utility (public/private)</li> <li>• State agency (EPD, GEFA, PSC, etc.)</li> <li>• EE/RE program owners/managers, incl. third parties</li> <li>• Carbon trading program</li> </ul>

Plan Element	Comment/description
Identification of affected entities, including an inventory of CO2 emissions from affected EGUs	<ul style="list-style-type: none"> <li>• Inventory Year = 2014 or 2015</li> </ul>
Description of plan approach and geographic scope	<ul style="list-style-type: none"> <li>• Approach - rate-based or mass-based</li> <li>• Geographic scope - state or multi-state</li> </ul>
State emission performance level to be achieved through plan	<p>Plan compliance metric</p> <ul style="list-style-type: none"> <li>• 834 lbs CO2/MWh (proposed)</li> <li>• or, 45 - 55 million (????) tons CO2</li> </ul>

Plan Element	Comment/description
Demonstration that plan is projected to achieve each of the state's emission performance levels for affected entities	<ul style="list-style-type: none"> <li>Modeling or other quantitative analysis demonstrates that measured emissions performance rate in 2022 and beyond will be less than or equal to interim and final goals</li> </ul>
Identification of emission standards for each affected entity	<p>Emissions standard</p> <ul style="list-style-type: none"> <li>Affected EGU: emissions rate, utilization, mass emitted, etc.</li> <li>Other affected entities: requirement that has the effect of reducing utilization (and therefore emissions) of one or more affected EGUs</li> </ul>
Demonstration that each emission standard is quantifiable, non-duplicative, permanent, verifiable, and enforceable	<ul style="list-style-type: none"> <li>non-duplicative – e. g., two state plans cannot take credit for power generated by same wind farm in Texas</li> </ul>

Plan Element	Comment/description
Program implementation milestones and corrective measures	<ul style="list-style-type: none"> <li>• milestones: start of EE program, retirement of EGU, etc.</li> <li>• corrective measures: to be implemented if measured emissions performance exceeds projected performance by 10% or more</li> </ul>
Applicable monitoring, reporting, and recordkeeping requirements for each affected entity	<ul style="list-style-type: none"> <li>• Historical experience with EGUs</li> <li>• First time for EE, RE, etc.</li> </ul>
Description of the process, contents, and schedule for annual state reporting to the EPA about plan implementation and progress	<p>Annual Report</p> <ul style="list-style-type: none"> <li>• Emissions performance of all affected entities</li> <li>• List of affected entities and their compliance status</li> <li>• Emissions performance of all affected EGUs</li> <li>• List of affected EGUs and their compliance status</li> </ul>

State Plan Elements

Plan Element	Comment/description
Certification that the public hearing on the state plan was held	
Supporting material (state legal authority, analytical data, etc.)	