



# ***State Plan Components and Timeline***

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# State Plan to Implement Emissions Guidelines for Existing EGUs

- Roadmap to achievement of state emissions performance goal starting in 2022
- Achieve final goal in 2030
- Required components ---> 60.5470 and 60.5475
- Composed by Georgia EPD ---> public comment ---> submit to EPA
- **State Plans** ---> equipment smokestack emission rates
- **SIPs** ---> ambient air quality standards (air you breathe)

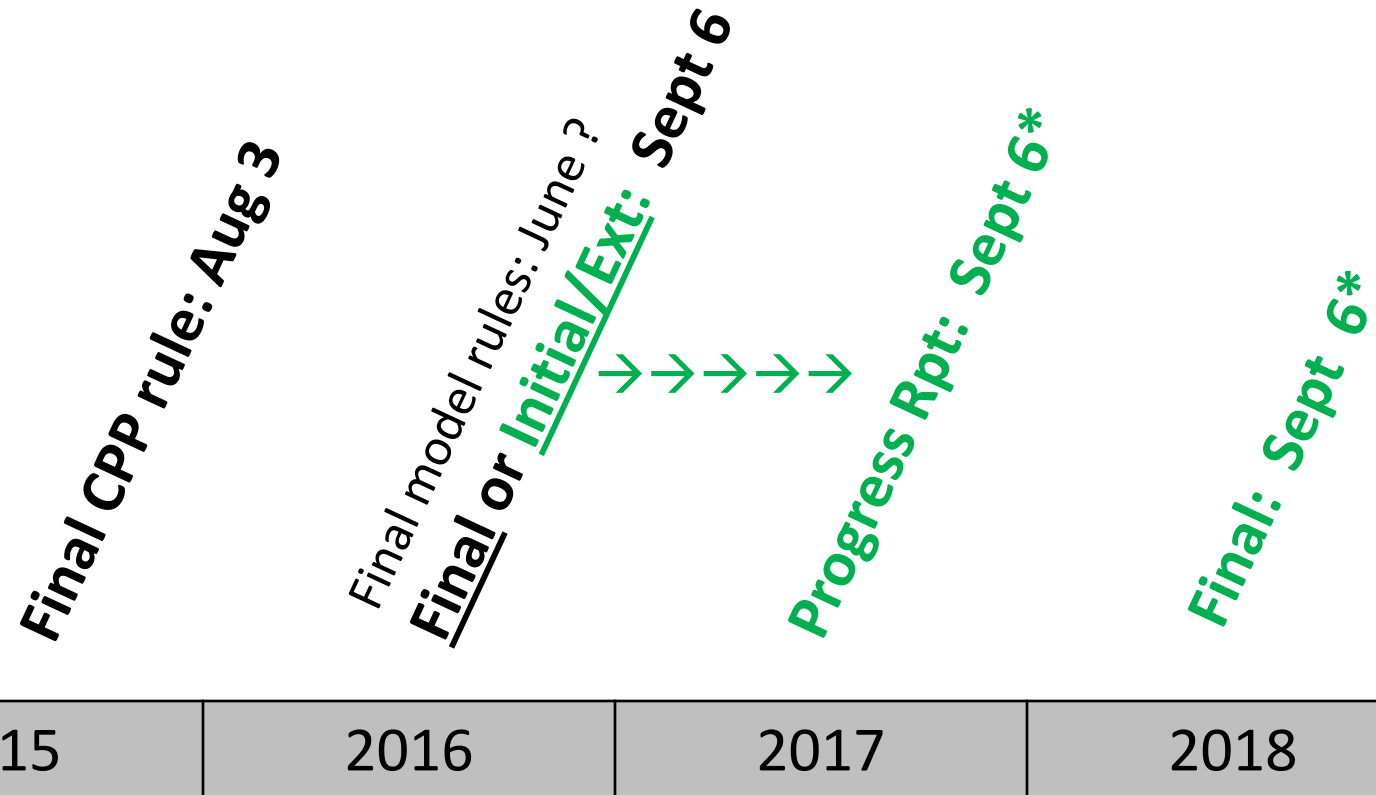


# The Regulations

- Final CPP rule for existing EGUs:
  - 40CFR60 Subpart UUUU
- Proposed model trading rules:
  - mass-based: 40CFR62 Subpart MMM
  - rate-based: 40CFR62 Subpart NNN



# Plan Submittal Timeline



\* Initial submittal + 2-year extension



## Initial Notification Option (60.5765)

- September 6, 2016 – submit initial notification and extension request
- EPA will notify state within 90 days of receipt if initial submittal does not meet requirements
- Otherwise extension request is deemed approved



# Initial Notification Required Elements

- Identification of plan approaches under consideration (mass-based, rate-based, sub-category stds., etc.)
- Progress made to date on final plan components
- Explanation of need for extension
- Demonstration of opportunity for public comment on initial submittal
- Demonstration of opportunity for meaningful engagement with stakeholders



# Stakeholder Engagement

- Regulated facilities, environmental organizations, communities, rate-payers
- CPP requires engagement with vulnerable communities in accessible locations/venues
- Initial submittal must demonstrate that engagement has already started
- Initial submittal must include plans for ongoing engagement during the two-year extension
- Georgia EPD is developing engagement plan



# Progress Report

- Due September 6, 2017
- Commitment to plan approach, including draft state regulation/legislation
- Plan completion roadmap with schedule and milestones
- Updates to community engagement actions/plans





# Final Plan Components – Fed Enforceable (60.5740)

- Identification of affected EGUs
- Emission std for each EGU (rate or mass); corrective measures if elect state blended rate std
- Backstop for “state measures” approach – federally enforceable
- Monitoring, reporting, and recordkeeping
- State reporting – July 2021 precheck rpt, July rpt following compliance periods

# Final Plan Components (continued)

## (60.5745)

- Plan approach & geographic boundary
- Emission performance goal: rate or mass
- Demo that projection of emission performance < goal (standard)
- Demo that performance stds are quantifiable, non-duplicative, verifiable, etc
- If state elects custom emission stds for its EGUs then must demo that application of the stds will achieve rate or mass goal set by EPA
- State measures, if elected – schedule, milestones, etc

# Final Plan Components (continued)

## (60.5745)

- Reliability of electric grid considered
- Timeline of milestone steps until start of 1<sup>st</sup> interim period
- State's sufficient legal authority and funding
- Demo that interim step goals will be met
- Certification and documentation of hearing
- Documentation of community outreach
- Supporting materials: legal authority, emissions performance demonstrations, etc.



# Timeline: 2016 Final Plan vs Ext Request

## *To-Do List for a Final Plan Submittal Includes:*

- Coordination: PSC, GEFA, and EPD
- Stakeholder outreach: facilities, NGOs, communities, etc.
- Review final model rules and choose plan approach
- **WRITE THE FULL PLAN**
- Public comment and hearing
- Amend Georgia Rules for Air Quality Control

**In 11 months ?????** > Initial Submittal and Extension



# Summary – State Plan Timeline

- Now thru Sept 2016
  - community engagement
  - review final model rules, analyze plan approaches
  - work on plan components
- Sept 2016 - initial submittal and extension request due
- Sept 2017 – progress report due; includes choice of plan approach and draft regulation/legislation
- Sept 2018 – final plan due and final state regulations promulgated
- Coordination across state agencies and organizations

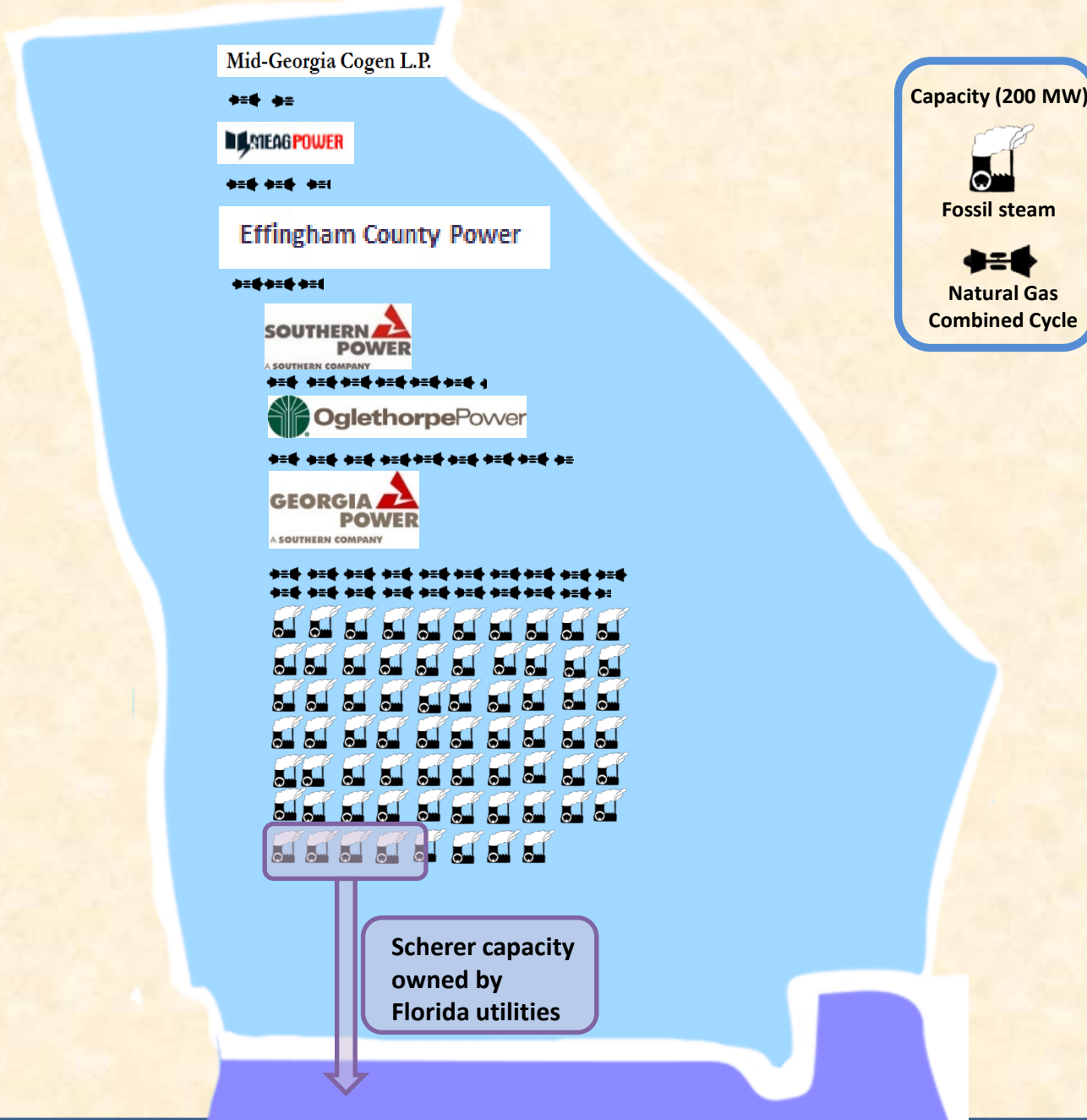


# Georgia CPP Landscape

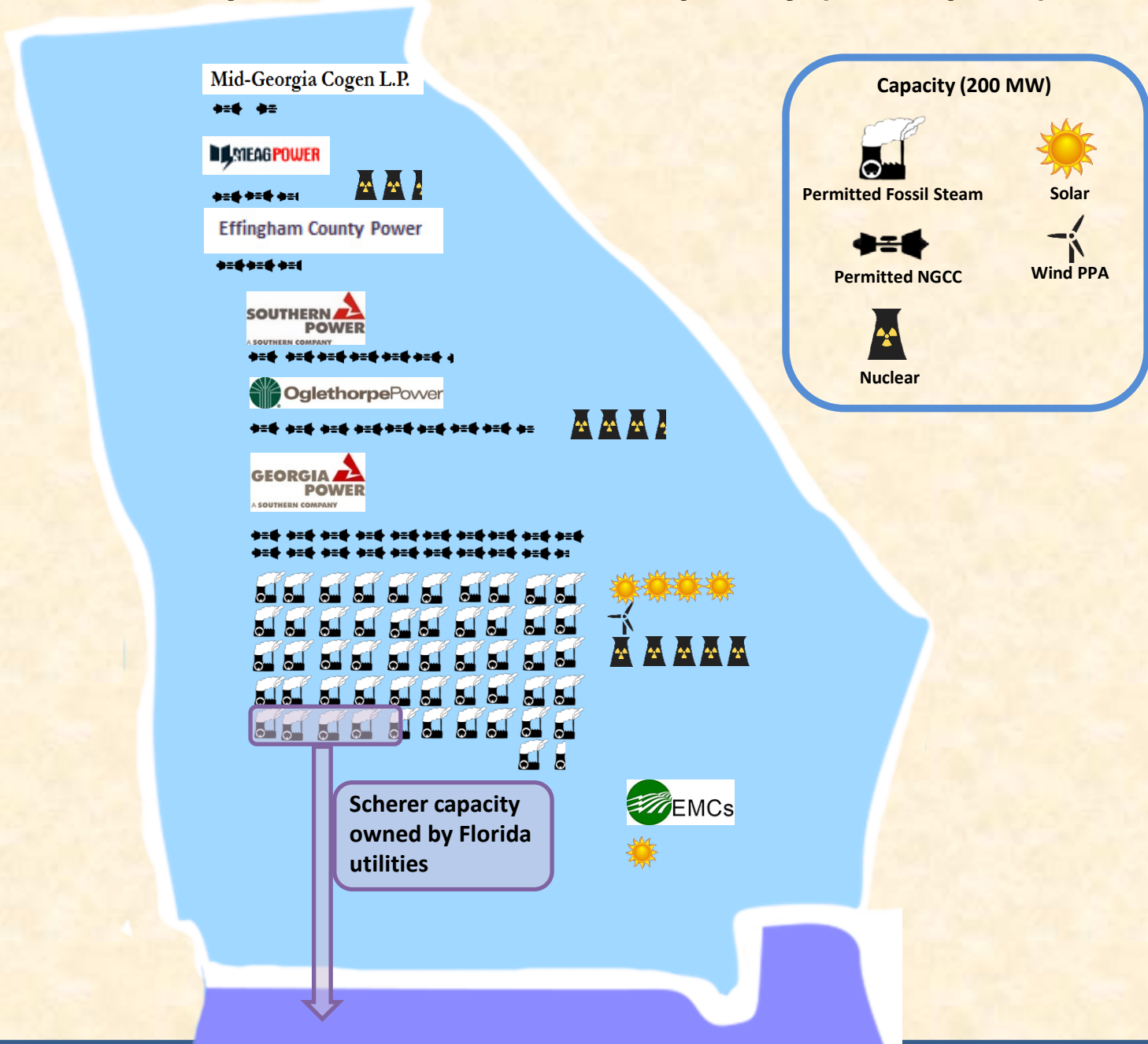


- EGUs
- Renewables
- Nuclear
- Energy Efficiency
- Consumption Growth

# Permitted Capacity of CPP-affected EGUs (2012)



# CPP Utility-Scale Generation Capacity (2020 plan)







# 2020 Business as Usual

- EPA: 1135 lb CO<sub>2</sub>/MWh
- Georgia EPD: < 1200 lb CO<sub>2</sub>/MWh

Period	State Goal
2022 - 2024	1290
2025 - 2027	1173
2028 - 2029	1094
2030 and later	1049

# Consumption Growth

- AGR of 0.5 – 1.5 % ?
- Growth from CPP affected EGUs + ERC-eligible sources?

<b>Annual growth (%)</b>	<b>All sources 18 year cum (%)</b>	<b>CPP sources 18 year cum (%)</b>
0.5	9.4	13.7
1.0	19.6	28.7
1.5	30.7	45.0



# Stakeholder Contacts and Followup

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- Today's presentations to be posted at [http: / epd.georgia.gov / air /](http://epd.georgia.gov/air/)