

Attachment D

***Information Submitted to the TCEQ for
the Coleta Creek Power Station***

July 6, 2015

VIA ELECTRONIC MAIL

Mr. Steve Hagle, Deputy Director MC 122
TCEQ, Office of Air
PO Box 13087
Austin, TX 78711-3087

Re: Coletto Creek Power, LP – Additional Information Concerning SO2 NAAQS
CN602809006; RN100226919

Dear Mr. Hagle:

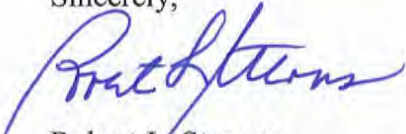
During our meeting on May 8, 2015, you requested additional information concerning Coletto Creek Power, LP's ("Coletto") operations. Included with this letter is the following information:

- Analysis of coal used by Coletto showing sulfur content for January 2015 to June 2015;
- Operating hours and cumulative emissions for 2012 through June 2015;

TCEQ also requested that Coletto provide a summary of any other equipment installed or measures implemented to comply with other applicable air regulations. Currently, Coletto is undergoing equipment installation and construction in order to comply with the Utility Maximum Achievable Control Technology ("UMACT") by April of 2016. Coletto is utilizing a two phase approach to comply with UMACT, which is designed to reduce Coletto's mercury emissions by more than 90 percent. The first phase, a pre-combustion coal additive system designed to reduce emissions, was installed and has been in operation since July 2014. The second phase includes the construction of an activated carbon injection system. In light of the recent Supreme Court Ruling regarding UMACT, Coletto is reviewing the activated carbon system and its timeline for implementation.

Please do not hesitate to contact me at 361-788-5100 or Robert.Stevens@gdfsuezna.com, if you have any questions or require further information regarding this matter.

Sincerely,



Robert L. Stevens
For Coletto Creek Power, LP

cc:

Cumulative Emissions

Plant: COC
Cumulative Emissions for: 2012

UNIT1								
	CO2TONSB tons/hr	HEATINB mmBtu/hr	LOAD Mwatt	NOX#/MM lb/mmBtu	NOXLBSB TONS	SO2#/HB TONS	UNITTOL OpTime	UNITTOL OpHrs
January	466,135.1	4,444,472	473,542	0.132	295.3	1,399.6	744.00	744
February	438,386.5	4,179,882	446,829	0.122	256.0	1,299.1	696.00	696
March	467,104.1	4,453,709	474,838	0.123	274.5	1,476.1	744.00	744
April	413,970.5	3,947,081	419,627	0.129	256.3	1,185.5	670.72	672
May	470,899.3	4,489,893	480,168	0.123	276.5	1,430.8	744.00	744
June	434,004.5	4,138,102	440,547	0.122	252.9	1,222.0	695.32	696
July	468,098.8	4,463,179	476,808	0.131	292.4	1,379.9	740.71	741
August	483,105.9	4,606,274	491,117	0.136	313.9	1,380.3	744.00	744
September	463,315.7	4,417,565	467,503	0.129	285.9	1,569.6	720.00	720
October	481,845.9	4,594,245	487,493	0.126	290.0	1,344.4	744.00	744
November	466,085.3	4,444,000	473,640	0.116	258.9	1,257.3	720.00	720
December	477,069.2	4,548,716	486,708	0.138	314.4	1,273.6	744.00	744
Quarter 1	1,371,625.7	13,078,063	1,395,209	0.126	825.8	4,174.8	2,184.00	2,184
Quarter 2	1,318,874.3	12,575,077	1,340,342	0.125	785.6	3,838.3	2,110.04	2,112
Quarter 3	1,414,520.4	13,487,017	1,435,428	0.132	892.2	4,329.8	2,204.71	2,205
Quarter 4	1,425,000.4	13,586,961	1,447,841	0.127	863.3	3,875.3	2,208.00	2,208
YTD	5,530,020.8	52,727,118	5,618,820	0.128	3,366.9	16,218.2	8,706.75	8,709
Ozone Quarter 2					529.3			
Ozone Quarter 3					892.2			
Ozone YTD					1,421.5			

Cumulative Emissions

Plant: COC
Cumulative Emissions for: 2013

UNIT1									
	CO2TONSB tons/hr	HEATINB mmBtu/hr	LOAD Mwatt	NOX#/MM lb/mmBtu	NOXLBSB TONS	SO2#/HB TONS	UNITTOL OpTime	UNITTOL OpHrs	
January	375,252.9	3,577,934	383,683	0.131	236.7	1,042.8	606.95	610	
February	420,471.0	4,009,074	430,184	0.132	265.3	1,193.3	672.00	672	
March	458,057.3	4,367,440	467,691	0.122	266.8	1,382.2	744.00	744	
April	389,688.0	3,715,568	396,941	0.124	231.2	1,099.0	623.00	623	
May	338,670.3	3,229,122	342,274	0.126	204.7	910.9	565.87	569	
June	458,508.8	4,371,744	459,536	0.137	301.1	1,457.2	714.07	716	
July	489,823.2	4,670,321	489,011	0.137	319.9	1,318.8	744.00	744	
August	486,687.2	4,640,423	486,279	0.128	297.3	1,641.2	744.00	744	
September	472,400.5	4,504,205	475,286	0.134	301.4	1,469.2	720.00	720	
October	385,077.8	3,671,608	389,498	0.126	231.3	1,080.7	599.83	600	
November	130,954.1	1,248,602	131,693	0.137	87.7	367.0	230.73	232	
December	461,424.7	4,399,552	467,971	0.136	300.0	1,381.5	717.28	719	
Quarter 1	1,253,781.2	11,954,447	1,281,558	0.128	768.7	3,618.3	2,022.95	2,026	
Quarter 2	1,186,867.1	11,316,434	1,198,751	0.129	737.0	3,467.1	1,902.94	1,908	
Quarter 3	1,448,910.9	13,814,950	1,450,576	0.133	918.6	4,429.1	2,208.00	2,208	
Quarter 4	977,456.5	9,319,762	989,162	0.132	619.0	2,829.1	1,547.84	1,551	
YTD	4,867,015.7	46,405,593	4,920,047	0.130	3,043.3	14,343.6	7,681.73	7,693	
Ozone Quarter 2					505.8				
Ozone Quarter 3					918.6				
Ozone YTD					1,424.4				

Cumulative Emissions

Plant: COC
Cumulative Emissions for: 2014

UNIT1								
	CO2TONSB tons/hr	HEATINB mmBtu/hr	LOAD Mwatt	NOX#/MM lb/mmBtu	NOXLBSB TONS	SO2#/HB TONS	UNITTOL OpTime	UNITTOL OpHrs
January	412,238.7	3,930,571	422,667	0.137	269.3	1,400.4	665.95	668
February	401,071.0	3,824,092	413,560	0.135	260.3	1,281.2	645.77	647
March	466,293.1	4,445,961	486,240	0.137	306.3	1,532.3	744.00	744
April	366,584.4	3,495,271	381,979	0.129	226.3	1,176.1	599.45	601
May	462,507.1	4,409,873	483,443	0.134	296.0	1,503.8	744.00	744
June	461,722.4	4,402,392	480,189	0.141	310.4	1,586.5	720.00	720
July	450,936.7	4,299,553	460,531	0.127	274.7	1,549.3	704.35	705
August	487,493.4	4,648,102	497,833	0.129	299.9	1,621.8	744.00	744
September	466,811.0	4,450,914	479,345	0.124	275.4	1,754.3	720.00	720
October	462,664.4	4,411,367	472,739	0.123	269.8	1,291.2	744.00	744
November	390,861.2	3,726,750	405,659	0.126	235.2	1,046.5	650.43	651
December	424,228.8	4,044,895	439,570	0.123	248.1	1,198.7	744.00	744
Quarter 1	1,279,602.7	12,200,624	1,322,467	0.136	835.8	4,213.9	2,055.72	2,059
Quarter 2	1,290,813.9	12,307,536	1,345,611	0.135	832.7	4,266.4	2,063.45	2,065
Quarter 3	1,405,241.1	13,398,570	1,437,709	0.127	850.0	4,925.4	2,168.35	2,169
Quarter 4	1,277,754.4	12,183,012	1,317,968	0.124	753.0	3,536.5	2,138.43	2,139
YTD	5,253,412.1	50,089,742	5,423,755	0.130	3,271.5	16,942.2	8,425.95	8,432
Ozone Quarter 2					606.5			
Ozone Quarter 3					850.0			
Ozone YTD					1,456.5			

Cumulative Emissions

Plant: COC
Cumulative Emissions for: 2015

UNIT1								
	CO2TONSB tons/hr	HEATINB mmBtu/hr	LOAD Mwatt	NOX#/MM lb/mmBtu	NOXLBSB TONS	SO2#/HB TONS	UNITTOL OpTime	UNITTOL OpHrs
January	399,667.8	3,810,716	414,150	0.119	226.8	1,088.0	744.00	744
February	194,524.4	1,854,742	199,932	0.121	112.8	486.9	387.87	388
March	169,966.6	1,620,584	168,614	0.127	102.7	429.1	316.98	317
April	5,686.0	54,215	0	0.060	1.8	17.3	46.53	54
May	155,525.5	1,482,884	150,388	0.157	122.5	356.8	379.69	386
June	293,576.8	2,799,161	291,115	0.127	180.2	702.0	557.13	558
July								
August								
September								
October								
November								
December								
Quarter 1	764,158.8	7,286,041	782,696	0.121	442.3	2,003.9	1,448.85	1,449
Quarter 2	454,788.4	4,336,260	441,503	0.135	304.5	1,076.1	983.35	998
Quarter 3								
Quarter 4								
YTD	1,218,947.2	11,622,301	1,224,199	0.127	746.8	3,080.0	2,432.20	2,447
Ozone Quarter 2					302.7			
Ozone Quarter 3								
Ozone YTD					302.7			

COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER 4804
CUST. SHIP ID
TRAIN CODE
DEPARTURE 01/10/2015 08:06 AM
ANALYSIS NUMBER YN150102

BASIS AS RECVD
MOISTURE 26.41
ASH 5.03
BTU/# 8895
SULFUR 0.22
SO2 0.49
MAF 12974.00
SODIUM 1.00
DRY ASH 6.84
DRY BTU/# 12087
DRY SULFUR 0.30
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COMPANY
CUSTOMER
DESTINATION
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE
ANALYSIS NUMBER

1
GDF SUEZ ENERGY MKTG N.A. INC.
COLETO CREEK PLANT

01/12/2015 05:00 PM
YN150131

BASIS AS RECVD
MOISTURE 27.05
ASH 5.29
BTU/# 8894
SULFUR 0.28
SO2 0.63
MAF 13145.00
SODIUM 1.09
DRY ASH 7.25
DRY BTU/# 12192
DRY SULFUR 0.38
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STATUS RESEND
COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 01/20/2015 05:05 AM
ANALYSIS NUMBER YN150217

BASIS AS RECVD
MOISTURE 26.01
ASH 5.65
BTU/# 8986
SULFUR 0.22
SO2 0.49
MAF 13149.00
SODIUM 1.02
DRY ASH 7.64
DRY BTU/# 12145
DRY SULFUR 0.30
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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 01/29/2015 02:30 AM
ANALYSIS NUMBER YN150317

BASIS AS RECVD
MOISTURE 26.14
ASH 5.55
BTU/# 8900
SULFUR 0.24
SO2 0.54
MAF 13029.00
SODIUM 1.05
DRY ASH 7.51
DRY BTU/# 12050
DRY SULFUR 0.32
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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 02/06/2015 06:25 AM
ANALYSIS NUMBER YN150402

BASIS AS RECVD
MOISTURE 26.42
ASH 5.57
BTU/# 8960
SULFUR 0.28
SO2 0.63
MAF 13175.00
SODIUM 0.93
DRY ASH 7.57
DRY BTU/# 12177
DRY SULFUR 0.38
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DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 02/11/2015 06:37 AM
ANALYSIS NUMBER YN150458

BASIS AS RECD
MOISTURE 26.91
ASH 4.56
BTU/# 9021
SULFUR 0.32
SO2 0.71
MAF 13164.00
SODIUM 1.02
DRY ASH 6.24
DRY BTU/# 12342
DRY SULFUR 0.44
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COMPANY
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DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 02/20/2015 08:53 PM
ANALYSIS NUMBER YN150573

BASIS AS RECD
MOISTURE 26.02
ASH 4.26
BTU/# 9150
SULFUR 0.20
SO2 0.44
MAF 13124.00
SODIUM 1.20
DRY ASH 5.76
DRY BTU/# 12368
DRY SULFUR 0.27
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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 03/15/2015 06:35 PM
ANALYSIS NUMBER YN150836

BASIS AS RECVD
MOISTURE 26.16
ASH 4.94
BTU/# 8982
SULFUR 0.19
SO2 0.42
MAF 13036.00
SODIUM 0.99
DRY ASH 6.69
DRY BTU/# 12164
DRY SULFUR 0.26
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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 03/16/2015 12:33 AM
ANALYSIS NUMBER YN150839

BASIS AS RECD
MOISTURE 26.24
ASH 4.90
BTU/# 8992
SULFUR 0.18
SO2 0.40
MAF 13058.00
SODIUM 1.15
DRY ASH 6.64
DRY BTU/# 12191
DRY SULFUR 0.24
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COMPANY _____
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER _____
CUST. SHIP ID _____
TRAIN CODE _____
DEPARTURE 04/11/2015 05:03 AM
ANALYSIS NUMBER YN151145

BASIS AS RECD
MOISTURE 26.29
ASH 5.60
BTU/# 8880
SULFUR 0.25
SO2 0.56
MAF 13038.00
SODIUM 0.99
DRY ASH 7.60
DRY BTU/# 12047
DRY SULFUR 0.34
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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 04/15/2015 03:50 AM
ANALYSIS NUMBER YN151186

BASIS AS RECD
MOISTURE 26.60
ASH 5.47
BTU/# 8882
SULFUR 0.20
SO2 0.45
MAF 13075.00
SODIUM 0.99
DRY ASH 7.45
DRY BTU/# 12101
DRY SULFUR 0.27
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COMPANY [REDACTED]
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE [REDACTED]
DEPARTURE 04/25/2015 04:13 AM
ANALYSIS NUMBER YN151288

BASIS AS RECD
MOISTURE 26.54
ASH 5.39
BTU/# 8884
SULFUR 0.22
SO2 0.50
MAF 13051.00
SODIUM 1.01
DRY ASH 7.34
DRY BTU/# 12094
DRY SULFUR 0.30
IF QUESTIONS CALL [REDACTED]
OR EMAIL [REDACTED]

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STATUS RESEND
COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 04/30/2015 02:53 PM
ANALYSIS NUMBER YN151346

BASIS AS RECVD
MOISTURE 26.40
ASH 5.31
BTU/# 8935
SULFUR 0.21
SO2 0.47
MAF 13084.00
SODIUM 1.01
DRY ASH 7.21
DRY BTU/# 12140
DRY SULFUR 0.29
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STATUS RESEND
COMPANY ██████████
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER 4804
CUST. SHIP ID ██████████
TRAIN CODE ██████████
DEPARTURE 05/02/2015 11:20 PM
ANALYSIS NUMBER YN151373

BASIS AS RECVD
MOISTURE 26.67
ASH 4.59
BTU/# 8981
SULFUR 0.21
SO2 0.47
MAF 13065.00
SODIUM 1.02
DRY ASH 6.26
DRY BTU/# 12247
DRY SULFUR 0.29
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STATUS RESEND
COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 05/05/2015 08:48 PM
ANALYSIS NUMBER YN151404

BASIS AS RECVD
MOISTURE 26.32
ASH 5.87
BTU/# 8789
SULFUR 0.22
SO2 0.50
MAF 12961.00
SODIUM 1.06
DRY ASH 7.97
DRY BTU/# 11929
DRY SULFUR 0.30
IF QUESTIONS CALL
OR EMAIL

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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 05/17/2015 05:38 AM
ANALYSIS NUMBER YN151505

BASIS AS RECVD
MOISTURE 26.53
ASH 4.98
BTU/# 8933
SULFUR 0.21
SO2 0.47
MAF 13043.00
SODIUM 0.97
DRY ASH 6.78
DRY BTU/# 12159
DRY SULFUR 0.29
IF QUESTIONS CALL
OR EMAIL

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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 05/19/2015 01:52 AM
ANALYSIS NUMBER YN151525

BASIS AS RECVD
MOISTURE 26.40
ASH 4.67
BTU/# 8996
SULFUR 0.23
SO2 0.51
MAF 13051.00
SODIUM 1.07
DRY ASH 6.35
DRY BTU/# 12223
DRY SULFUR 0.31
IF QUESTIONS CALL
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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION BLACK THUNDER
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 05/28/2015 01:34 AM
ANALYSIS NUMBER YN151617

BASIS AS RECVD
MOISTURE 26.87
ASH 4.33
BTU/# 8968
SULFUR 0.21
SO2 0.47
MAF 13035.00
SODIUM 1.30
DRY ASH 5.92
DRY BTU/# 12263
DRY SULFUR 0.29
IF QUESTIONS CALL
OR EMAIL

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COMPANY
CUSTOMER GDF SUEZ ENERGY MKTG N.A. INC.
DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 06/12/2015 03:52 AM
ANALYSIS NUMBER YN151791

BASIS AS RECVD
MOISTURE 26.16
ASH 4.56
BTU/# 9055
SULFUR 0.23
SO2 0.51
MAF 13070.00
SODIUM 1.24
DRY ASH 6.18
DRY BTU/# 12263
DRY SULFUR 0.31
IF QUESTIONS CALL
OR EMAIL

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