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**To:** [Kathleen Truesdell](#);  
**CC:** [Bryan Bertacchi](#); [Greg Lamberg](#); [Greg Darvin](#); [Ty Remington](#);  
[Craig Matis](#);  
**Subject:** Oakley Generating Station - Annual Operating Profile Assumptions  
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**Attachments:** Pages from LTRFO040108.pdf

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Kathleen -

Greg Darvin mentioned that you were interested in seeing PG&E's requirements that we are responding to with respect to our assumed annual operating profile(s). Attached are two pages from PG&E's 2008 Long Term Request for Offers (LTRFO) which define the generating characteristics PG&E desired for Facility Ownership proposals. The requirements under D.II apply to our Oakley Generating Station offering. For the annual emissions, these requirements are best reflected in the Annual Emissions 1 tab of my Excel workbook. This case assumes 300 starts, of which 25 are cold starts. We assumed all of the remaining 275 starts were hot starts as we are showing no difference in emissions for warm starts versus hot starts. PG&E did not specify the number of operating hours, so we made an assumption of 5,157 base load hours, of which 1,500 hours are at Peak July conditions (the balance of 3,657 hours are assumed to be at ISO conditions). The Peak July emissions are not significantly different than the ISO emissions (previously, the project included HRSG duct firing and the Peak July hours represented duct-fired operation).

The Annual Emissions 2 tab considers a 6x16 dispatch profile, wherein the plant would run six days per week for 16 hours per day (and be off on Sundays). We believed that PG&E's assumption of 25 cold starts was not entirely realistic given our past experiences. Annual Emissions 2 trades off the cold starts for a greater number of hot and warm starts and more operating hours. The net result is that the total annual emissions are very close to those calculated for Annual Emissions 1.

The Annual Emissions 3 tab represents more of a base-load operation with a high number of operating hours and fewer starts. Although this dispatch profile includes more operating hours than would be expected from a plant intended for "shaping or load following generation", we wished to include it so that the air permit would allow for this type of operation in the event it was ever necessary.

I hope this helps. Please let me know if you have any follow-up questions.

Thanks much!

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