

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:

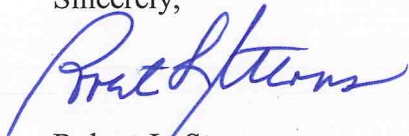
During our meeting on May 8, 2015, you requested additional information concerning Coletto Creek Power, LP's ("Coletto") operations. Included with this letter is the following information:

- 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
IF QUESTIONS CALL
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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 RECD
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
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DESTINATION COLETO CREEK PLANT
PURCHASE ORDER
CUST. SHIP ID
TRAIN CODE
DEPARTURE 02/06/2015 06:25 AM
ANALYSIS NUMBER YN150402

BASIS AS RECD
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 RECVD
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
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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]
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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
IF QUESTIONS CALL ██████████
OR EMAIL ██████████

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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
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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
OR EMAIL

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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 RECD
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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