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To: [Jacobs, Wendy](#); [Gere, Merrily](#)
Cc: [Gorman, Erin](#)
Subject: Phase 1 NOx RACT Proposal
Date: Wednesday, November 11, 2015 12:05:13 PM

Good afternoon Merrily and Wendy,

Thank you for providing the new lower daily NOx RACT rate of 0.26 lb/MMBtu that would apply to Bridgeport Unit 3. Can you provide any insights on where that value came from?

After review of our historical operating data over the past 7 years, there would be a few periods where we would exceed this value. Our actual emissions data supports a lower limit of 0.28 lb/MMBtu has been achievable every day this limit would apply over the past 7 years and we would advocate for 0.28 lb/MMBtu in the draft rule. For reference, Pennsylvania's draft RACT rule, which is expected to be final in early 2016 lists 0.12 lb/MMBtu for units with SCRs and 0.35 lb/MMBtu for units without SCRs. This rule takes effect in 2017.

We would be happy to discuss this further tomorrow, but wanted to see if 0.28 lb/MMBtu could be proposed in the NOx RACT Workgroup presentation?

Best regards,

-Bob

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