

Mirant Potomac River, LLC
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March 23, 2006



Mr. Lawrence Mansueti
Permitting, Siting and Analysis Division
Office of Electricity Delivery and Energy Reliability
United States Department of Energy
Routing Symbol OE-20
1000 Independence Avenue, S.W.
Washington, D.C. 20585

RE: District of Columbia Public Service Commission,
Docket No. EO-05-01

Dear Mr. Mansueti:

Attached are the Comments of Mirant Potomac River, LLC, which are being submitted in compliance with Order No. 202-06-1, issued by the Department of Energy ("DOE") on February 17, 2006, in the captioned proceeding.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa D. Johnson", written over a horizontal line.

Lisa D. Johnson
President
Mirant Potomac River, LLC

Enclosure

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY**

District of Columbia Public Service)
Commission)

Docket No. EO-05-01

COMMENTS OF MIRANT POTOMAC RIVER, LLC

Pursuant to Order No. 202-06-1 issued by the Department of Energy (“DOE”) on February 17, 2006, Mirant Potomac River, LLC (“Mirant”) submits the following comments regarding the operation of the Potomac River Plant (“Plant”) during certain days in January 2006, during which Mirant was required to operate pursuant to Ordering Paragraph A of Order No. 202-05-3, as well as information regarding the Plant’s current operations.

I. Outage of Line 23106

The outage of Line 23106 commenced on January 12, 2006 at 9:00 a.m. and continued until January 19, 2006 at 7:05 p.m. Pepco had initially filed with DOE a plan for the Line 23106 outage to occur during the period January 9 – 16, 2006; however, the outage did not begin until January 12, 2006, because Mirant was not able to have all 5 generating units on and stable until January 12. Specifically, unit 3 developed a condenser leak and was removed from service at 8:02 a.m. on January 9, 2006, and did not return to service until 9:38 a.m. on January 11, 2006. PJM required all 5 generating units to be on-line before commencement of the Line 23106 outage.

As Mirant advised DOE in Mirant’s letter of September 7, 2005, to prevent rusting and corrosion of boiler and feedwater cycle surfaces, units that are to be out of service for an indefinite period of time are put into “lay-up” mode. Mirant began the process of putting units 2, 3, 4 and 5 into lay-up on September 17, 2005, and such units remained in lay-up mode through December 27, 2005. Mirant’s September 7, 2006 letter described certain critical activities necessary to return a unit to service, some of which activities can not be performed on multiple units at one time, thus extending the cold startup times supplied to PJM and set forth in the September 7, 2005 letter.

In support of the anticipated Line 23106 and Line 23107 outages, Mirant began bringing units 2, 3, 4, and 5 out of lay-up mode on December 28, 2005. Beginning with units 2 and 4, the lay-up solution was drained from the boilers into portable storage tanks. The boilers were then refilled with demineralized water and tested for satisfactory water chemistry. All other unit systems were then made ready for service. Units 3 and 5 boilers were then handled similarly.

Mirant also notified DOE in the September 7, 2005 letter that “because of the design capacity of the No. 2 Fuel Oil system used for startup, the Plant is limited to two units starting concurrently.” In order to have units 1 – 5 operating and available for dispatch as of January 9, 2006, as required by the dispatch order received from PJM on January 5, 2006, Mirant began the start-up process for units 2, 3, 4 and 5 on January 7, 2006. The start-up process takes between 7 and 11

hours depending on the unit design and involves firing the boiler with No. 2 fuel oil to warm all boiler components and eventually produce steam to warm all steam turbine components. Because of limitations in the design capacity of the No. 2 Fuel Oil system, only 2 units can be in a startup mode concurrently. Unit 5 was the first unit restarted, followed by unit 4, unit 3 and lastly unit 2. Unit 1 was fully prepared for dispatch because it had been operating on the limited basis described in Mirant's letter of September 20, 2005.

As required by the DOE Order No. 202-05-03, issued on December 20, 2005, and in accordance with the directions of PJM in support of the Line 23106 outage, Mirant operated units 1 – 5 when dispatched by PJM during the period of the Line 23106 outage. During the Line 23106 outage, Mirant had one rental trona injection unit at the Plant available for operation and such trona unit was operated at unit 4.

On January 19, 2006, at 7:42 p.m., PJM notified Mirant that the Line 23106 outage was complete and, in accordance with PJM directions, Mirant began the process of shutting down units 1, 2, 3 and 5. Shut-down was completed by 9:35 p.m. on January 19, 2006. Unit 4 remained available for dispatch during the days between completion of the Line 23106 outage and commencement of the Line 23107 outage. The rental trona injection system was operated at unit 4 during that three-day period.

II. Outage of Line 23107:

The line outage for Line 23107 commenced on January 23, 2006 at 11:00 a.m. and continued through January 28, 2006 at 6:18 p.m. None of the units had been put back into lay-up mode after the completion of the Line 23106 outage, but the units were cold after 3 days off. The September 7, 2005 letter describes the normal start-up times for cold start-up. In accordance with dispatch orders PJM gave Mirant on January 17, 2006, Mirant began the process of unit start-up as to units 3 and 5, and units 1 and 2 on January 21 and 22, 2006 respectively. All 5 units of the Plant were operated throughout the outage.

At the time of commencement of the Line 23107 outage, Mirant had a second rental trona injection unit available for use. During the Line 23107 outage, the rental trona injection units were operated on units 3 and 4. At 6:35 p.m. on January 28, 2006, PJM notified Mirant that the outage of Line 23107 was complete and, in accordance with PJM directions, Mirant began the process of shutting down units 1, 2, 3 and 5. Shut down was completed by 9:45 p.m. on January 28, 2006. Unit 4 remained in operation with one of the trona systems.

III. Current Operational Status of Plant

None of the five units at the Plant has been returned to lay-up mode. Since completion of the line outages, Mirant has been operating the Plant in one and two unit configurations pending completion of systems and processes required to fully implement the three-unit operating configurations contemplated by Option A as described in Mirant's Operating Plan (the "Operating Plan") submitted to the DOE on December 30, 2005 in compliance with Ordering Paragraph B of DOE Order No. 202-05-2 issued on December 20, 2005. Mirant has submitted to DOE via Supplements to the Operating Plan modeling results applicable to the unit combinations pursuant to which it has operated since submittal of the Operating Plan.