

The Honorable James Richard Perry
Secretary of the Energy
United States Department of Energy
1000 Independence Ave, SW
Washington, DC 20585

Re: Report on Yorktown Units 1 and 2 Operations Pursuant to Order No. 202-17-4

Dear Secretary Perry:

Pursuant to Order No. 202-17-4 (the “Order”) issued on September 14, 2017, by the Secretary of Energy (“Secretary”), PJM Interconnection, L.L.C. (“PJM”) and Dominion Virginia Electric and Power Company (“Dominion Energy Virginia”) respectfully submits the attached reports regarding a test run of Yorktown Units 1 and 2 on October 25 2017 in accordance with the Secretary’s directive to “report all dates on which Yorktown Unites 1 and 2 are operated as well as the estimated emissions and water usage data associated with their operations.”¹

In the PJM application submitted June 13, 2017 (incorporated by reference in the PJM August 24 renewal application), PJM explained that emissions from the plant would occur at times outside of periods where PJM dispatches the Yorktown units for reliability.² These times include basic, periodic, and compliance related activities undertaken to ensure the units remain reliable and capable of operating when necessary. These activities are consistent with normal operating procedures and good engineering practices. These activities include operating equipment for maintenance testing and reliability check out, testing of fuel systems, tuning of units, required emissions or operational testing, and other operating procedures. Without performing these activities Dominion Energy Virginia may not be prepared to run the Yorktown Units when directed by PJM to ensure reliability.

¹ Order at page 2. The Order is for the period September 15 to December 14, and directs the emission report to be submitted every two weeks. November 9 is the end of the fourth two week period.

² PJM Application at page 13, incorporated by reference in the PJM Renewal Application at page 1.

On October 25, for approximately 5 hours Dominion Energy Virginia tested equipment on the Yorktown Units as part of a quarterly effort to ensure reliability of these two units when called upon by PJM to provide grid stability. This testing included running sub-systems and firing of ignitors and warm up burners to functionally test and verify operation for start-up. Dominion Energy Virginia did not fire the boiler for any extended period but just long enough to cycle through all the ignitors and warm up the burners. The Company tests each unit individually; the first run was the unit 1 reliability test and the second run was the unit 2 reliability test run. The two tests differed in duration due to troubleshooting of equipment issues for the start-up as well as working through some opacity issues that is commonplace when a boiler sits for a period of time and ash settles in the ductwork.

Dominion Energy Virginia does not plan on testing these units again this year but will likely test again at the beginning of 2018 depending on whether PJM dispatches the units and they operate before the end of December. If PJM dispatches the units, Dominion Energy Virginia plans on conducting these tests 2-1/2 to 3 months after the last run. For example, PJM dispatches the units in mid- December, Dominion Energy Virginia would not test again until near the end of March, but if PJM dispatches the units in late December, January, or February the units would not test again until near the end of May.³

Attachment 1 to this report is the Yorktown Power Station Bi-weekly Emissions Data for October 17 to October 30 that shows the actual runtime and air emissions data for the period. This spreadsheet includes hourly runtime data for the equipment for the Yorktown units, and raw and calculated data showing emissions data associated with operations of the equipment. Note that the Yorktown generators did not generate any power transmitted to the grid during the test.

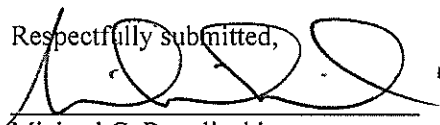
The information in Attachment 1 reports hourly emissions of PM-10 and SO₂ in pounds per hour and pounds per million BTU, and mercury in pounds per hour and pounds per trillion BTU (Mercury and Air Toxics Standards (MATS) format) for the operating period beginning August 21 through August 23, 2017. Additionally, Attachment 1 provides hourly emissions of NO_x in pounds per hour, greenhouse

³ The later test date runs assumes, of course, that PJM submits another renewal application which is subsequently granted by the Secretary.

gases (as CO₂) in tons per hour, lead in pounds per hour, HCl in pounds per hour, HF in pounds per hour, and CO in pounds per hour. NO_x and SO₂ emissions are based on valid hours of Continuous Emissions Monitoring System (CEMS) data for the period. PM-10 emissions are based on the emission factor derived from the July 21, 2017 stack test (0.0168 lbs/mmBtu corrected to 0.1143 lbs/mmBtu calculated for PM-10 filterable plus condensable). CO₂ emissions are based on valid CEMS hours for the operating period. All other emissions were calculated using emission factors from AP-42, Fifth Edition, Volume 1, Chapter 1: External Combustion Sources and calculated hourly coal consumption in tons.⁴

Attachment 2 of this report is entitled “Yorktown Power Station October 2017 Circulating Water Usage for Reliability Test.” This report provides the intake circulating water usage for the Yorktown units tests.

PJM and Dominion Energy Virginia respectfully submits the information in this report be accepted by the Secretary as compliant with the Order’s directives to report all dates on which Yorktown Units 1 and 2 are operated well as the estimated and actual emissions and water usage data associated with their operations.

Respectfully submitted,

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⁴ Mercury and lead emissions were calculated using AP-42, Table 1.1-18. CO emissions were calculated using emission factors from AP-42, Table 1.1-3. Total HAP metals and individual HAP metals are not provided because MATS Table 2 (40 CFR 63, Subpart UUUUU) provides for compliance with either the PM limit or total non-mercury HAP metals limits or individual HAP metals. Dominion Energy Virginia is providing PM-10 emissions for the purposes of MATS. HCl and HF emissions were calculated using emission factors from AP-42, Table 1.1-15.

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