

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

**In the Matter of:** )  
 )  
**AMENDMENTS TO** ) **R18-20**  
**35 ILL. ADM. CODE 225.233,** ) **(Rulemaking – Air)**  
**MULTI-POLLUTANT STANDARDS (MPS)** )

**NOTICE OF FILING**

To: ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the attached **PREFILED QUESTIONS FOR ANDREW ARMSTRONG**, copies of which are herewith served upon you.

*/s/ Ryan Granholm*  
\_\_\_\_\_  
Ryan Granholm

Dated: April 10, 2018

Ryan Granholm  
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**PREFILED QUESTIONS FOR ANDREW ARMSTRONG**

NOW COME Dynegy Midwest Generation, LLC, Illinois Power Generating Company, Illinois Power Resources Generating, LLC and Electric Energy, Inc. (collectively, “the Companies”), by their attorneys, Schiff Hardin LLP, and hereby submit prefiled questions for Andrew Armstrong. The Companies request that the Hearing Officer allow follow-up questioning to be asked at hearing based on the answers provided.

1. Has the Illinois Attorney General’s Office (“AGO”) ever participated in a Clean Air Act Section 110(l) determination?
2. Has the AGO ever discussed a Clean Air Act Section 110(l) determination with the United States Environmental Protection Agency (“USEPA”)?
3. According to footnote 16 of the AGO’s December 11, 2017 pre-filed testimony (Board’s Exhibit 9), an annual NO<sub>x</sub> cap of 25,000 tons corresponds to a hypothetical year in which all MPS units ran at a 76.1% capacity factor, correct?
4. An SO<sub>2</sub> emissions cap of 49,000 tons, annually, is 73.8% of Illinois EPA’s calculated “allowable emissions” of 66,354 tons, correct?
  - a. So utilizing the methodology set forth on pages 15 and 16 (including footnote 16) of Exhibit 9, an annual SO<sub>2</sub> cap of 49,000 tons corresponds to a hypothetical year in which all MPS units ran at a 73.8% capacity factor, correct?
5. An SO<sub>2</sub> emissions cap of 34,094 tons, annually, is 51.3% of Illinois EPA’s calculated “allowable emissions” of 66,354 tons, correct?
  - a. So utilizing the methodology set forth on pages 15 and 16 (including footnote 16) of Exhibit 9, an annual SO<sub>2</sub> cap of 34,094 tons corresponds to a hypothetical year in which all MPS units ran at a 51.3% capacity factor, correct?
6. An NO<sub>x</sub> emissions cap of 18,920 tons, annually, is 57.6% of Illinois EPA’s calculated “allowable emissions” of 32,841 tons, correct?

- a. So utilizing the methodology set forth on pages 15 and 16 (including footnote 16) of Exhibit 9, an annual NO<sub>x</sub> cap of 18,920 tons corresponds to a hypothetical year in which all MPS units ran at a 57.6% capacity factor, correct?
7. On page 17 of Exhibit 9 the AGO states: “Thus, a more realistic framework for analysis than Illinois EPA’s ‘allowable emissions’ is to identify the *actual* potential to emit which takes into account the real rate of pollution for each unit.” (emphasis in original).
  - a. Please turn to Attachment 6 of your April 3, 2018 pre-filed testimony. Does cell P50 contain the SO<sub>2</sub> “actual potential to emit,” as that phrase appears in the quote above, for the MPS fleet using unit level emission rates for SO<sub>2</sub> from 2017? If not, please explain why not.
  - b. The SO<sub>2</sub> “actual potential to emit” for the MPS fleet using unit level emission rates for SO<sub>2</sub> from 2017 is 51,083 tons, correct?
  - c. Please turn to Attachment 6 of your April 3, 2018 pre-filed testimony. Does the addition of cells H30 and H31 represent the NO<sub>x</sub> “actual potential to emit,” as that phrase appears in the quote above, for the MPS fleet using unit level emission rates for NO<sub>x</sub> from 2017? If not, please explain why not.
  - d. The NO<sub>x</sub> “actual potential to emit” for the MPS fleet using unit level emission rates for NO<sub>x</sub> from 2017 is 32,172 tons, correct?
8. Was any of the operating and emission information presented in your April 3, 2018 pre-filed testimony, including the information contained in the attachments, available to you as of December 11, 2017? If not, please explain why that information was not available.
9. Was all of the operating and emission information presented in your April 3, 2018 pre-filed testimony, including the information contained in the attachments, available to you as of February 6, 2018? If not, please explain why that information was not available.

Respectfully submitted,

*/s/ Ryan Granholm*

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Attorney for The Companies

Dated: April 10, 2018

SCHIFF HARDIN LLP

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Amy Antonioli

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Caitlin Ajax

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## CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 10<sup>th</sup> day of April, 2018, I have electronically served the attached **PREFILED QUESTIONS FOR ANDREW ARMSTRONG**, upon all parties on the attached service list.

My e-mail address is [rgranholm@schiffhardin.com](mailto:rgranholm@schiffhardin.com);

The number of pages in the e-mail transmission is 6.

The e-mail transmission took place before 5:00 p.m.

*/s/ Ryan Granholm*

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Ryan Granholm

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