

# New Source Performance Standards: EGUs

## Background

GE Power & Water offers a diverse set of solutions in virtually every segment of the electric generation sector, including natural gas, cleaner coal, renewables, and nuclear. EPA's re-proposal of the GHG NSPS rule for new facilities will have important impacts on future energy development in the United States, and by way of example, other markets abroad.

## Recommendations

### Regulatory certainty is critical for maintaining a diverse, secure energy mix

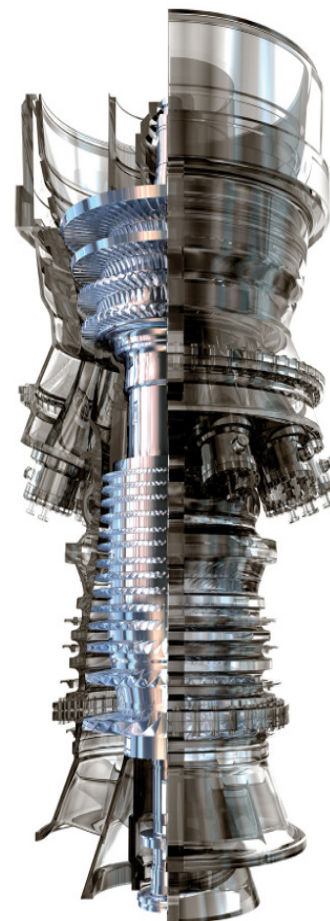
- \* A well-crafted proposal could help create certainty for investors, developers and utilities, leading to cleaner electric generation while protecting the environment.
- \* EPA's decisions on the current proposal will have important implications in both the near and long-term, including the upcoming rulemaking on existing sources.
- \* EPA should split the standard for CO<sub>2</sub> emissions into separate categories by fuel.

### Each standard must be set right

- \* EPA's standard for NGCC units should be achievable over the full range of operating conditions. EPA should therefore propose a standard of 1,100 lbs CO<sub>2</sub>/MWh.
- \* Stricter standards do not mean better performance, greater efficiency or fewer emissions. Too low a standard can have unintended consequences by limiting flexible operation of NGCC plants, making it more difficult to integrate renewables on the grid.
- \* EPA must factor in the actual performance characteristics of plants once installed and put into operation.

### EPA should maintain a sharp focus on simple cycle applications

- \* Simple cycle turbines are unlikely to achieve the same standards as combined cycle plants. These turbines encounter frequent startups, shutdowns, and variable loads.
- \* Simple cycle turbines and combined cycle units are not interchangeable with each other, and perform very different roles on the grid.



## GE Power & Water

Revenue (2012)	\$28B
GE R&D Funding (2012)	>\$5.7B
Employees	>40,000
Locations	>700

## Power Generation Services

Revenue (2012)	\$8B
Headquarters	Atlanta
Employees	>7,600
Countries	>100
Assets monitored	>1,400
Operating data (hours)	>93M