

Utility Water Act Group (UWAG) Executive Order 12866 Meeting (Apr. 2, 2024) - Final Rule, Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category

**Cost Comparison for Installing Treatment Technology
to Satisfy the FGD Wastewater Limits in the 2020 ELG Rule**

Plant Name (Units)	EPA Estimated Costs for Biological Treatment + Adjustment for Chemical Precipitation (Pre-tax 2018 dollars) ¹		UWAG Member Estimated Costs for Biological Treatment (\$)	
	Capital	O&M	Capital	O&M
Fort Martin (Units 1 and 2) ²	10,997,849	576,766	45,597,126	553,000
Trimble County (Units 1 and 2) ³	12,785,392	1,535,726	67,333,333	3,688,477
Mill Creek (Units 1-4) ⁴	5,560,844	442,871	67,200,000	800,000
Ghent (Units 1-4) ⁵	9,068,391	741,951	80,000,000	5,916,634
Mitchell (Units 1 and 2) ⁶	13,463,922	--	48,811,000	--
Cross (Units 1-4) ⁷	5,971,518	448,708	138,300,000	5,199,021

¹ Eastern Research Group, Inc., *Generating Unit-Level Costs and Loadings Estimates by Regulatory Option – DCN SE08638*, Table 5 (FGD Wastewater Regulatory Option B), at 30-37 (Aug. 31, 2020). EPA calculated a treatment-in-place adjustment to estimate the capital and O&M costs that would be incurred by plants that already operate some components of the model chemical precipitation treatment system. See Supplemental Technical Development Document, at 5-25 to 5-26 (Aug. 2020).

² Petition to approve an Effluent Limitation Guideline Project and related Surcharge of Monongahela Power Company and The Potomac Edison Company, Public Service Commission of West Virginia, Exhibit DVS-1, Page 2 of 2 (Dec. 15, 2021).

³ In the Matter of Electronic Application of Louisville Gas and Electric and Kentucky Utilities Companies for Approval of Their 2020 Compliance Plan for Recovery by Environmental Surcharge, Public Service Commission of Kentucky, Case Nos. 2020-00060 and 2020-00061, Direct Testimony of Robert M. Conroy, Exhibit RSS-2, Pages 15 and 27 of 71 (Mar. 31, 2020). Estimated capital and O&M costs for Trimble County have changed since the March 31, 2020 filing. Capital and O&M costs in this chart have been revised accordingly to reflect more accurate internal company estimates.

⁴ *Id.* at Exhibit RSS-2, Pages 36 and 48 of 71. Estimated capital costs for Mill Creek have changed since the March 31, 2020 filing. Capital and O&M costs in this chart have been revised accordingly to reflect more accurate internal company estimates.

⁵ *Id.* at Exhibit RSS-2, Pages 57 and 70 of 71. Estimated capital costs for Ghent have changed since the March 31, 2020 filing. Capital and O&M costs in this chart have been revised accordingly to reflect more accurate internal company estimates.

⁶ Direct Testimony of Brian D. Sherrick on behalf of Appalachian Power Company and Wheeling Power Company, Public Service Commission of West Virginia, Company Exhibit BDS-D3. Capital cost estimate for the Mitchell Plant only includes biological treatment with ultrafiltration; it does not include chemical precipitation.

⁷ Santee Cooper Demonstrations for February 23, 2023 OMB Meeting. The Capital and O&M costs for Cross Generating Station include estimates, without contingency, for a physical-chemical and biological treatment system in combination as required to meet the 2020 ELG Rule's FGD Wastewater limits.