

Hagler, Tom

From: Jeffrey.Allmon@pinnaclewest.com
Sent: Tuesday, December 10, 2019 3:48 PM
To: Minor, Dustin
Cc: KMcGrath@hunton.com; LBachtel@hunton.com
Subject: FCPP NPDES Permit - Water Balance Discussion

Hi Dusty,

This is just a quick note regarding the issues we discussed today regarding water reuse at Four Corners relative to our cooling-water condenser system. Again, the CDP figures that Barth cites in his petition are inapposite to what really matters for 316b purposes and water recirculation. In the latter case, you're talking about how much water does the plant use for cooling in the condensers (approximately on average 1.44 billion gallons per day) versus what we withdraw from the San Juan River (approximately on average 14.3 million gallons per day). Comparing these figures is how we get to 99% water reuse, and is an accurate reflect of the plant's status as a closed-loop water recirculation system.

By contrast, the CDP figures cited by Barth look at how much water does the plant withdraw from the San Juan River versus how much water is *discharged* as blown down from Morgan Lake dam. Again, on average, we withdraw 14.3 million gallons per day and discharge on average approximately 2.9 million gallons per day, which is 20% of what is withdrawn from the river. As we discussed, this is inapposite to what you consider for 316b purposes.

Please let me know if you'd like to discuss further or have any questions about this.

Best,
Jeff

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