

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING

In the Matter of the Appeal)
And Petition for Review of:)
BART Permit No. MD-6040)
(Jim Bridger Power Plant); and) Docket No. 10-2801
BART Permit No. MD-6042)
(Naughton Power Plant).)

**RESPONSE TO PACIFICORP'S MOTION FOR PARTIAL SUMMARY
JUDGMENT**

DEQ/AQD Charts given to PacifiCorp on 7/23/08

EXHIBIT 17

BART vs. Recent BACT for NO_x

Company - Facility	Unit	Control Scenario	NO _x Control	Average Cost Effectiveness (\$/ton)	Incremental Cost Effectiveness (\$/ton)	Tons Removed (tpy)
Recent BACT Decisions						
Black Hills Corporation - WYGEN 2	—	—	SCR/LNB/OFA, 0.07 lb/MMBtu	4,156	7,742	4,283
Black Hills Corporation - WYGEN 3	—	—	SCR/LNB/OFA, 0.05 lb/MMBtu	4,037	11,102	968
Basin Electric - Dry Fork Station	—	—	SCR/LNB/OFA, 0.05 lb/MMBtu	1,751	10,303	4,279
BART Options						
Pacifcorp - Dave Johnston	Unit 3	Scenario A	LNB/OFA, 0.28 lb/MMBtu	381	381	4,636
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	2,351	6,291	6,954
	Unit 4	Scenario A	LNB/OFA, 0.15 lb/MMBtu	208	208	4,041
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	3,081	12,056	5,334
Pacifcorp - Wyodak	Unit 1	Scenario A	LNB/OFA, 0.23 lb/MMBtu	881	881	1,482
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	4,253	5,939	4,447
Pacifcorp - Jim Bridger	Unit 1	Scenario A	LNB/OFA, 0.26 lb/MMBtu	255	255	4,494
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	2,258	4,262	8,988
	Unit 2	Scenario A	LNB/OFA, 0.26 lb/MMBtu	0	0	0
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	4,275	4,275	4,494
	Unit 3	Scenario A	LNB/OFA, 0.26 lb/MMBtu	255	255	4,494
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	2,256	4,258	8,988
	Unit 4	Scenario A	LNB/OFA, 0.26 lb/MMBtu	255	255	4,494
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	2,267	4,279	8,988
Pacifcorp - Naughton	Unit 1	Scenario A	LNB/OFA, 0.26 lb/MMBtu	426	426	2,334
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	2,751	6,667	3,719
	Unit 2	Scenario A	LNB/OFA, 0.26 lb/MMBtu	357	357	2,649
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	2,848	6,519	4,447
	Unit 3	Scenario A	LNB/OFA, 0.37 lb/MMBtu	82	82	1,167
		Scenario B	SCR/LNB/OFA, 0.07 lb/MMBtu	2,830	3,562	5,542

Note: Tons removed for BART options represent the reduction from baseline

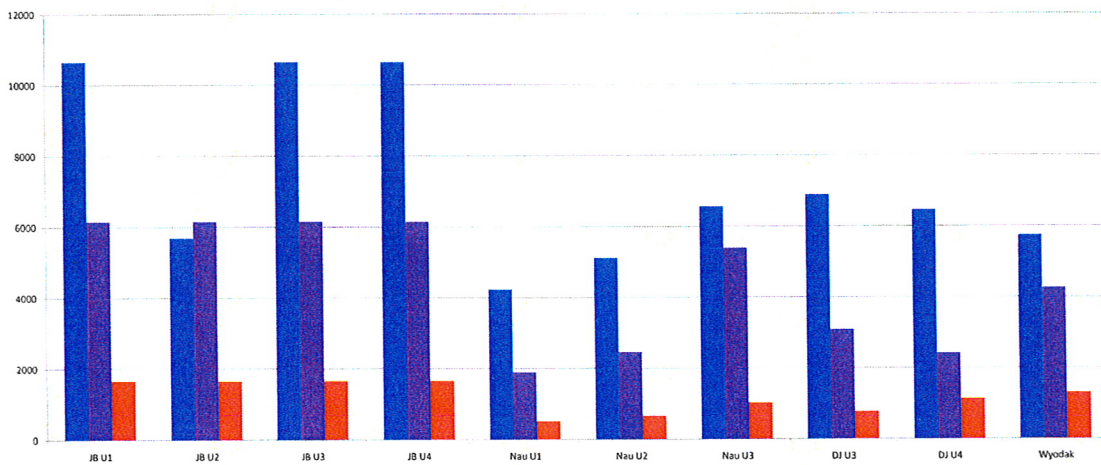
7/17/2008

AQD Jim Bridger BART
002851

JB = Jim Bridger
Nau = Naughton
DJ = Dave Johnston

NOx Emissions for Baseline & BART Scenarios (tons per year)

■ Baseline
■ Proposed BART
■ Proposed BART + SCR



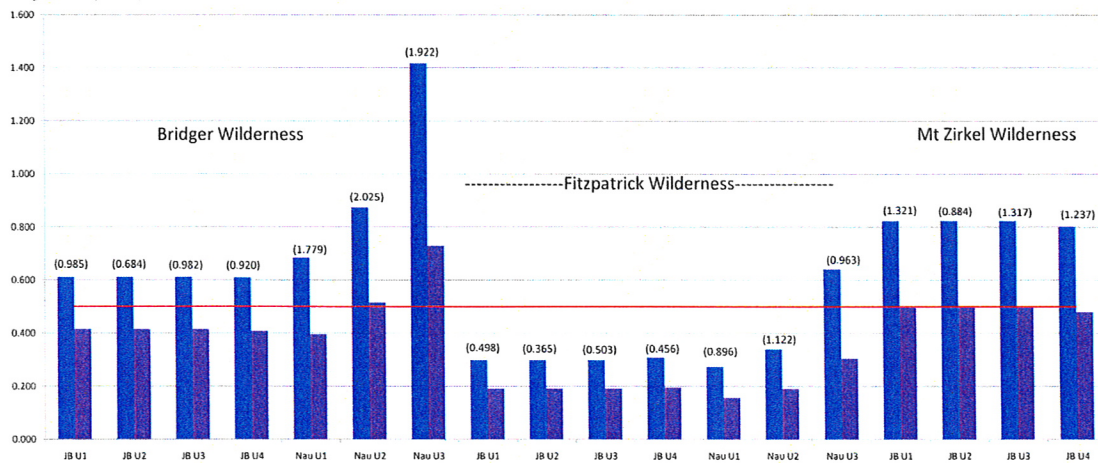
7/17/2008

AQD Jim Bridger BART
002852

JB U1 = Jim Bridger Unit 1 (530 MW)
 JB U2 = Jim Bridger Unit 2 (530 MW)
 JB U3 = Jim Bridger Unit 3 (530 MW)
 JB U4 = Jim Bridger Unit 4 (530 MW)
 Nau U1 = Naughton Unit 1 (160 MW)
 Nau U2 = Naughton Unit 2 (210 MW)
 Nau U3 = Naughton Unit 3 (330 MW)

Modeled BART Impacts: 98th Percentile (delta-dv) (Bridger WA, Fitzpatrick WA, Mt Zirkel WA)

(Baseline)
 Proposed BART
 Proposed BART + SCR
 0.5 dv "insignificant" line



(Modeling results represent the three-year average using 2001-2003 meteorology)

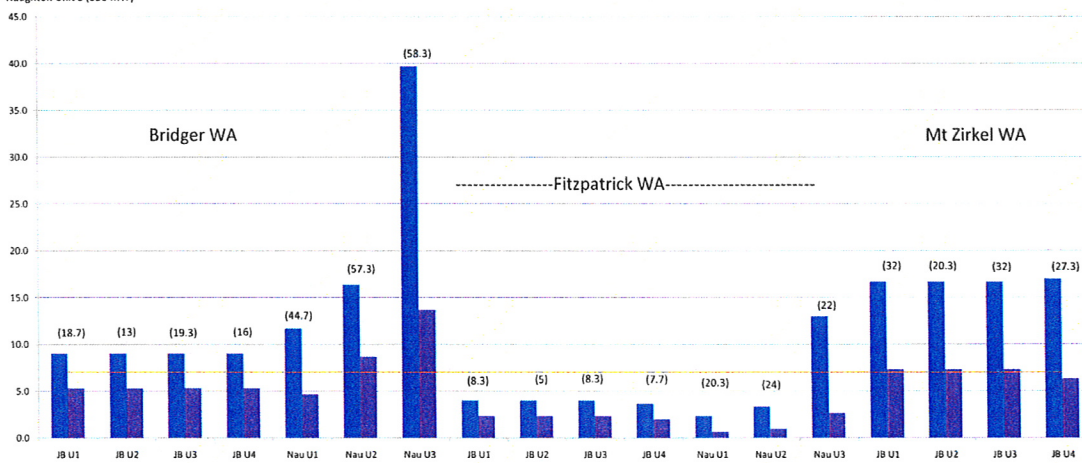
7/17/2008

AQD Jim Bridger BART
 002853

JB U1 = Jim Bridger Unit 1 (530 MW)
 JB U2 = Jim Bridger Unit 2 (530 MW)
 JB U3 = Jim Bridger Unit 3 (530 MW)
 JB U4 = Jim Bridger Unit 4 (530 MW)
 Nau U1 = Naughton Unit 1 (160 MW)
 Nau U2 = Naughton Unit 2 (210 MW)
 Nau U3 = Naughton Unit 3 (330 MW)

Modeled BART Impacts: # Days > 0.5 dv (Bridger WA, Fitzpatrick WA, Mt Zirkel WA)

(baseline result)
 ■ Proposed BART
 ■ Proposed BART + SCR
 — 98th Percentile "zero" line



(Modeling results represent the three-year average using 2001-2003 meteorology)

7/17/2008

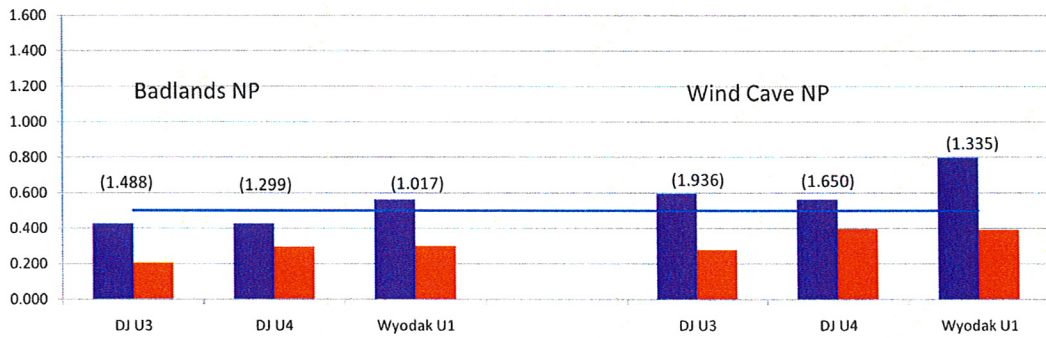
AQD Jim Bridger BART
002854

Modeled BART Impacts: 98th Percentile (delta-dv) (Badlands NP and Wind Cave NP)

Wyodak Unit 1 (335 MW)
DJ U3 = Dave Johnston Unit 3 (230 MW)
DJ U4 = Dave Johnston Unit 4 (330 MW)

(baseline result)

■ Proposed BART
■ Proposed BART + SCR
— 0.5 dv "insignificant" line



(Modeling results represent the three-year average of results using 2001-2003 meteorology)

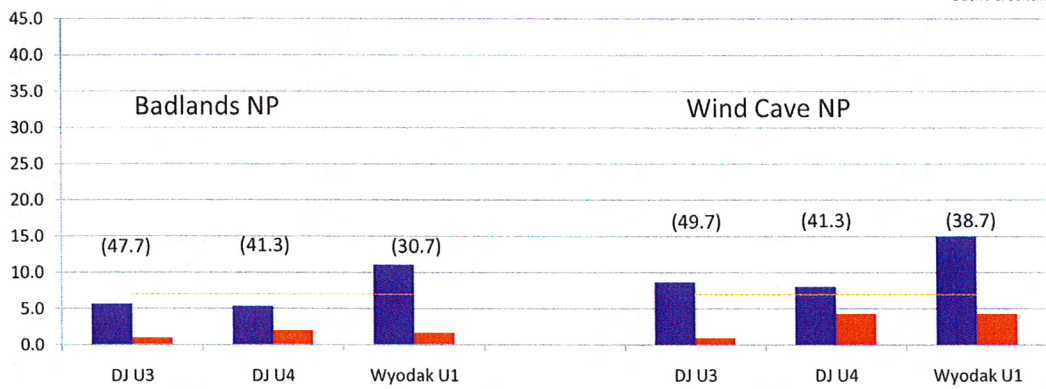
7/17/2008

AQD Jim Bridger BART
002855

Modeled BART Impacts: # of Days > 0.5 dv (Badlands NP and Wind Cave NP)

Wyodak Unit 1 (335 MW)
 DJ U3 = Dave Johnston Unit 3 (230 MW)
 DJ U4 = Dave Johnston Unit 4 (330 MW)

(baseline result)
■ Proposed BART
■ Proposed BART + SCR
— 98th Percentile "zero" line



(Modeling results represent the three-year average of results using 2001-2003 meteorology)

7/17/2008

AQD Jim Bridger BART
 002856