

## Jakuta, Joseph (DOEE)

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**From:** Kevin Turner <ktt32@georgetown.edu>  
**Sent:** Monday, May 9, 2022 7:26 PM  
**To:** Ours, Stephen (DOEE); Jakuta, Joseph (DOEE)  
**Cc:** Bob Sidner; Brubach, Hannah (DOEE); Susan Martin  
**Subject:** Re: Alternative RACT Clarification Questions - Georgetown University

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Good Evening,

Below are your recent questions about the Alternative NOx RACT submission and Georgetown University's responses. I hope this information is helpful.

**DOEE Question 1:**

Georgetown relied on an interest rate of 4.0% for use in the cost of capital calculations; what was the basis for choosing this interest rate?

**Response:**

A four percent (4%) interest rate was selected to conservatively underestimate the calculated annualized cost of each pollution control option. Georgetown used this approach, along with the assumption that associated direct and indirect annual costs are zero, to highlight the cost-prohibitive nature of the identified controls. For example, the use of a potentially more representative seven percent (7%) interest rate increases the annualized costs of Option B and Option C by approximately \$7,000 per ton of NOx removed. (Note: A 7% interest rate was used in the permit application calculations that led to the issuance of permits 7214 through 7217 in 2019. Those permits authorized the construction and operation of Georgetown's Central Utility Plant Modernization and Upgrade Project.)

**DOEE Question 2:**

We are concerned about the CO emissions increasing significantly. Can you demonstrate that CO emissions would not cause a NAAQS exceedance?

**Response:**

Yes, Georgetown is working to complete detailed air dispersion modeling that is expected to demonstrate as such. It is anticipated that the modeling results, corresponding modeling report, and requisite air permit application will be completed and submitted to DOEE by the end of August 2022.

Sincerely,

Kevin

On Mon, May 2, 2022 at 10:49 AM Kevin Turner <[ktt32@georgetown.edu](mailto:ktt32@georgetown.edu)> wrote:

Hi Joseph and Stephen,

Thank you for your time to review our submission. We will review these questions and respond by May 16, 2022.

Best,

Kevin

On Mon, May 2, 2022 at 10:05 AM Ours, Stephen (DOEE) <[stephen.ours@dc.gov](mailto:stephen.ours@dc.gov)> wrote:

Adding Bob Sidner to this email chain.

Steve

**Stephen S. Ours, P.E.**

Pronouns: He/Him/His

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**From:** Jakuta, Joseph (DOEE) <[Joseph.Jakuta@dc.gov](mailto:Joseph.Jakuta@dc.gov)>

**Sent:** Monday, May 2, 2022 10:04 AM

**To:** [ktt32@georgetown.edu](mailto:ktt32@georgetown.edu)

**Cc:** Brubach, Hannah (DOEE) <[hannah.brubach@dc.gov](mailto:hannah.brubach@dc.gov)>; Ours, Stephen (DOEE) <[stephen.ours@dc.gov](mailto:stephen.ours@dc.gov)>

**Subject:** Alternative RACT Clarification Questions - Georgetown University

Mr. Turner,

Thank you for your submission under Alternative RACT as allowed under 20 DCMR Section 805.2. We have been reviewing the alternative RACT submission transmitted to DOEE and require clarification on a few points before proceeding. Can you respond to the following questions by May 16, 2022?

- Georgetown relied on an interest rate of 4.0% for use in the cost of capital calculations, what was the basis for choosing this interest rate?
- We are concerned about the CO emissions increasing significantly. Can you demonstrate that CO emissions would not cause a NAAQS exceedance?

Joseph Jakuta

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