

# **Using Low-Cost Optimization Technologies to Reduce the Carbon Footprint**

**Peter Spinney, Director of Market & Technology Assessment**

**October 2, 2008**

**Mcllvaine Hot Topic: Greenhouse Gas Strategies for Coal Fired Plants**

# NeuCo's Mission

- To maximize the impact generating assets have on the bottom-line, using real-time asset optimization solutions to improve:
  - **Availability**
    - Maximum reliable capacity whenever needed
  - **Efficiency**
    - Producing this capacity at the lowest possible cost
  - **Emissions**
    - Lower emissions and costly reagents

# What is Optimization?

- The **process** of turning reams of complex data into **actionable** knowledge that delivers **bottom line** benefit
- An Optimizer Must:
  - **ACT**: continuously identify actions that can improve asset performance
  - **QUANTIFY**: the benefits & missed opportunities
  - **INFORM**: users about what actions were taken and why

## Data Sources

ERPs (e.g. SAP)

CMMSs (e.g. Maximo)

Monitors (e.g. Optimax)

Analyzers (e.g. Zolo)

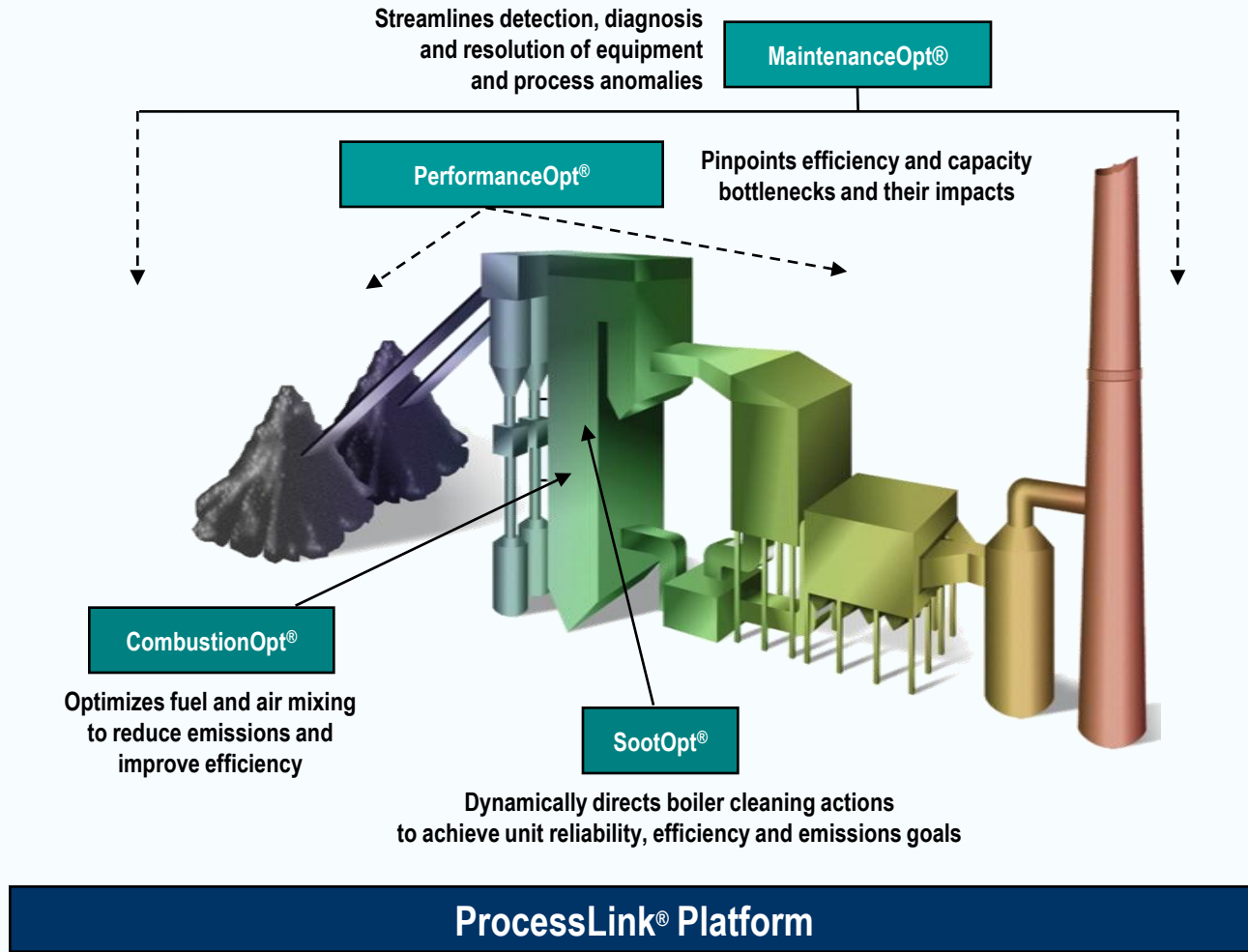
Detectors (e.g. SmartSignal)

Historians (e.g. OSI)

DCSs (e.g. ABB)



# Optimization Applications



# Emissions Regulations Increasing

- 29 states covered under regional initiatives
- First RGGI auction occurred last week
  - Strong response despite issues with cap vs. actual CO<sub>2</sub>
- New Midwest Accord adding states
- 14 states w/GHG emissions targets
- Near-term Federal legislation likely
  - Both Presidential candidates support cap & trade
  - Several pending bills before House and Senate
  - Wide range of reductions and time-tables
  - May be coupled with multi-pollutant bill
  - Legislative need to address CAIR/CAMR gaps

# Addressing GHGs With Optimization

- No commercial emissions control systems for CO<sub>2</sub>
  - Improving efficiency only proven option
- Optimization suite can improve efficiency & reduce CO<sub>2</sub> by 1.5-2%
- Achieve lowest-cost CO<sub>2</sub> reductions
- Co-benefits
  - Reduced NOx and/or reagent costs
  - Improved control over CO and opacity
  - Increased reliability and commercial availability

# Potential Annual CO<sub>2</sub> Benefits for One 500 MW Coal-Fired Unit

CO <sub>2</sub> \$/ton	Heat Rate Improvement			
	-0.50%	-1.00%	-1.50%	-2.00%
<b>\$2.50</b>	\$60,925	\$121,851	\$182,776	\$243,701
<b>\$7.50</b>	\$182,776	\$365,552	\$548,328	\$731,103
<b>\$10.00</b>	\$243,701	\$487,402	\$731,103	\$974,805
<b>\$15.00</b>	\$365,552	\$731,103	\$1,096,655	\$1,462,207
<b>\$20.00</b>	\$487,402	\$974,805	\$1,462,207	\$1,949,609
<b>\$25.00</b>	\$609,253	\$1,218,506	\$1,827,759	\$2,437,012

# CombustionOpt

- Provides real-time closed-loop optimization of fuel and air mixing
  - Manipulates relevant fuel & air injection points
- Neural network and model predictive control technologies
- Improves NOx, heat rate, steam temp, CO, MW, and opacity



# Unit 3: CombustionOpt Home

12/7/2007 02:00 PM (2 days)

## Optimization Advice

Issue/Action	Actual	Target	Prior...	Fuel Svngs (\$/mo...)	NO
MVs Disabled(percent)	85.19	100	Low	7,315	

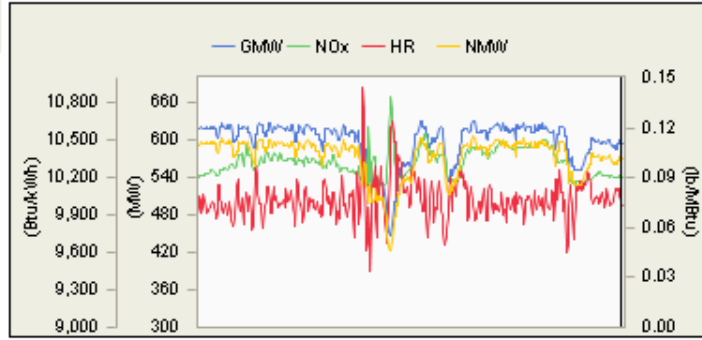
## What's Going on Now and Why

Supervisory Profile: 12/7/2007 1:58:37 PM [Analysis...](#)

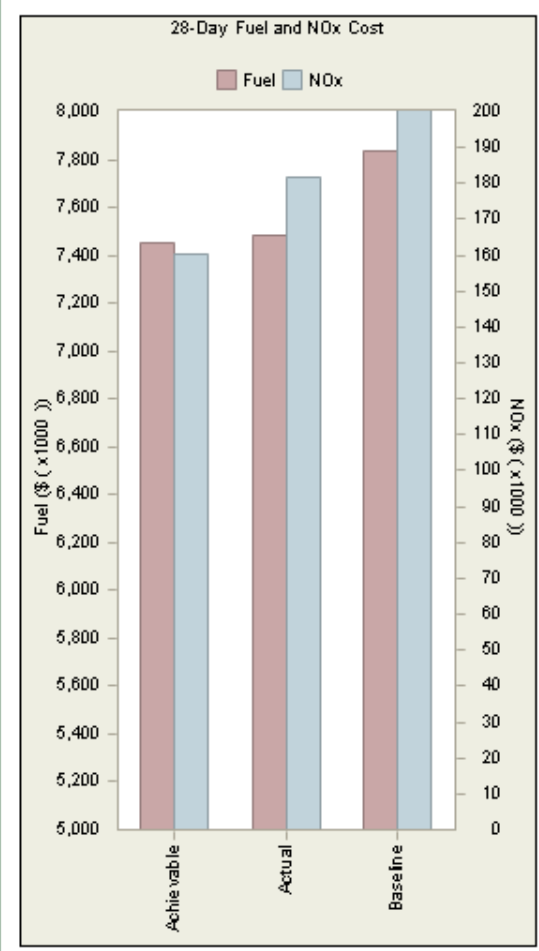
MV Name	Pre-Move	Post-Move
AUXDPR AA SEL BIAS	-5	-5
AUXDPR AB SEL BIAS	9.75	9.5
AUXDPR BC SEL BIAS	-0.145	-0.333
AUXDPR CD SEL BIAS	-4.5	-4
AUXDPR DE SEL BIAS	-5	-5
AUXDPR EF SEL BIAS	-4.875	-4.875
AUXDPR FF SEL BIAS	9.809	9.765
FEEDER A SEL BIAS	1.07	0.57
FEEDER B SEL BIAS	5	5

Objectives	Actual	Predicted	Target	Delta Cost
NOx (lb/MBtu)	0.0917	0.0865	Down	
RH Spray Flo	50.16	46.85	< 25 (klb/h)	
Heat Rate (Bt)	10035.1	9998.1	Down	
Mill 3A dP (in)	7.94	7.92	< 7.5 (inH)	
Sum of Fdr Bi	0.04	0.03	0	
Mill 3F dP (in)	7.00	6.95	< 7.5 (inH)	
Mill 3C dP (in)	6.07	6.07	< 7.5 (inH)	
O2 1 & 2 (per)	3.39	3.43	> 2.5 (perc)	
Mill 3B dP (in)	5.33	5.33	< 7.5 (inH)	

Unit Status	Online	MV Clusters	Enabled	Total
Aux Air	7	7	7	7
Fuel Air	6	6	6	6
Feeders	6	6	6	6
SOFA Tilts	0	2	0	2
SOFA Dmprs	4	4	4	4
O2, WB DP	0	2	0	2
<b>Total</b>	<b>23</b>	<b>27</b>	<b>23</b>	<b>27</b>

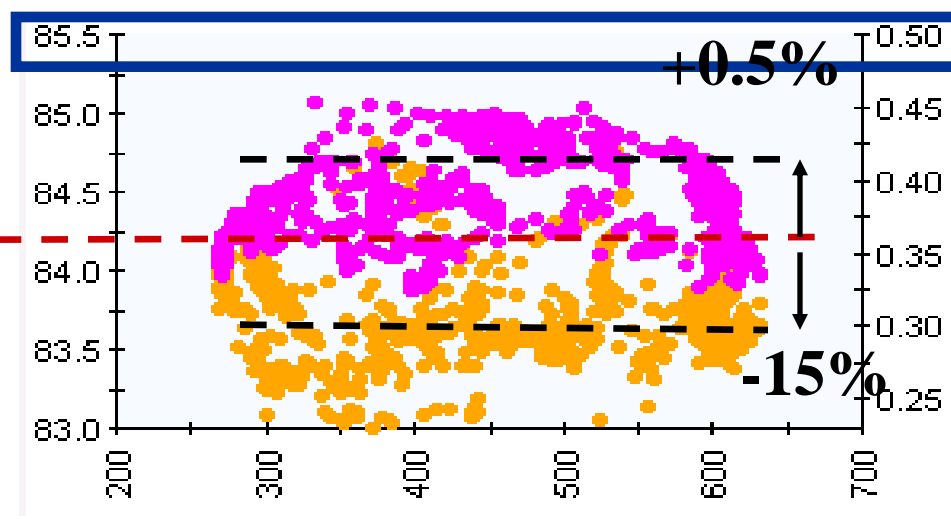
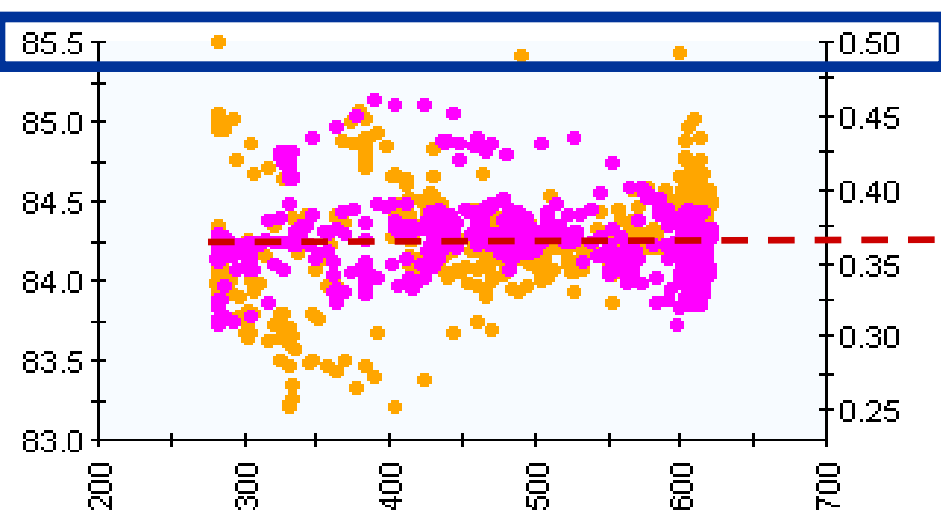
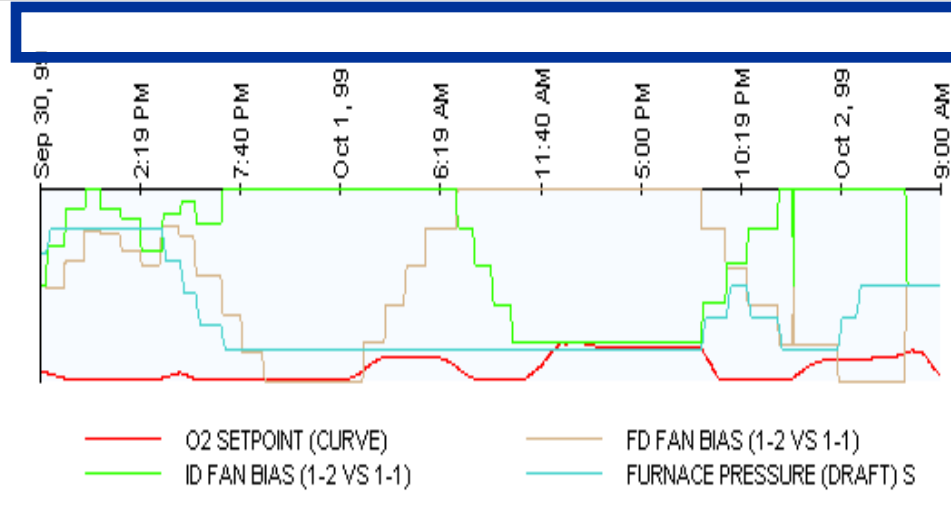
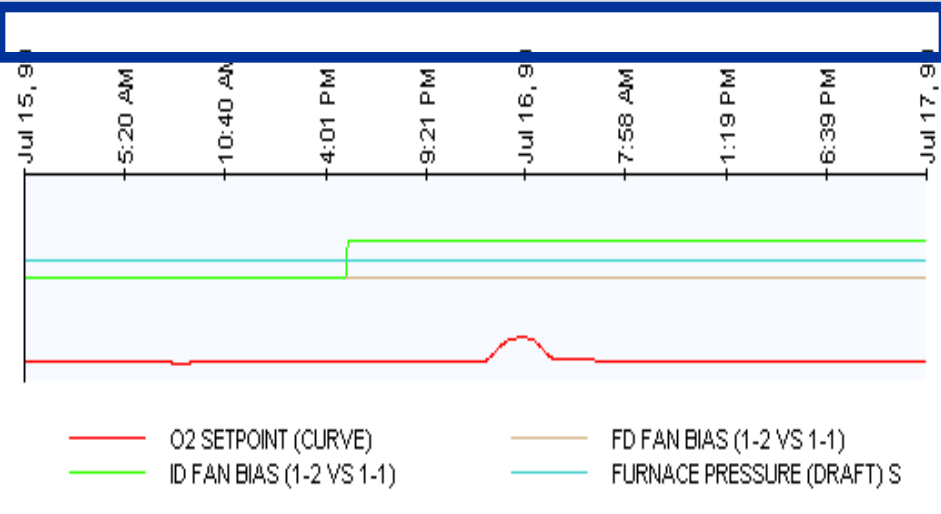


## Optimization Benchmarks

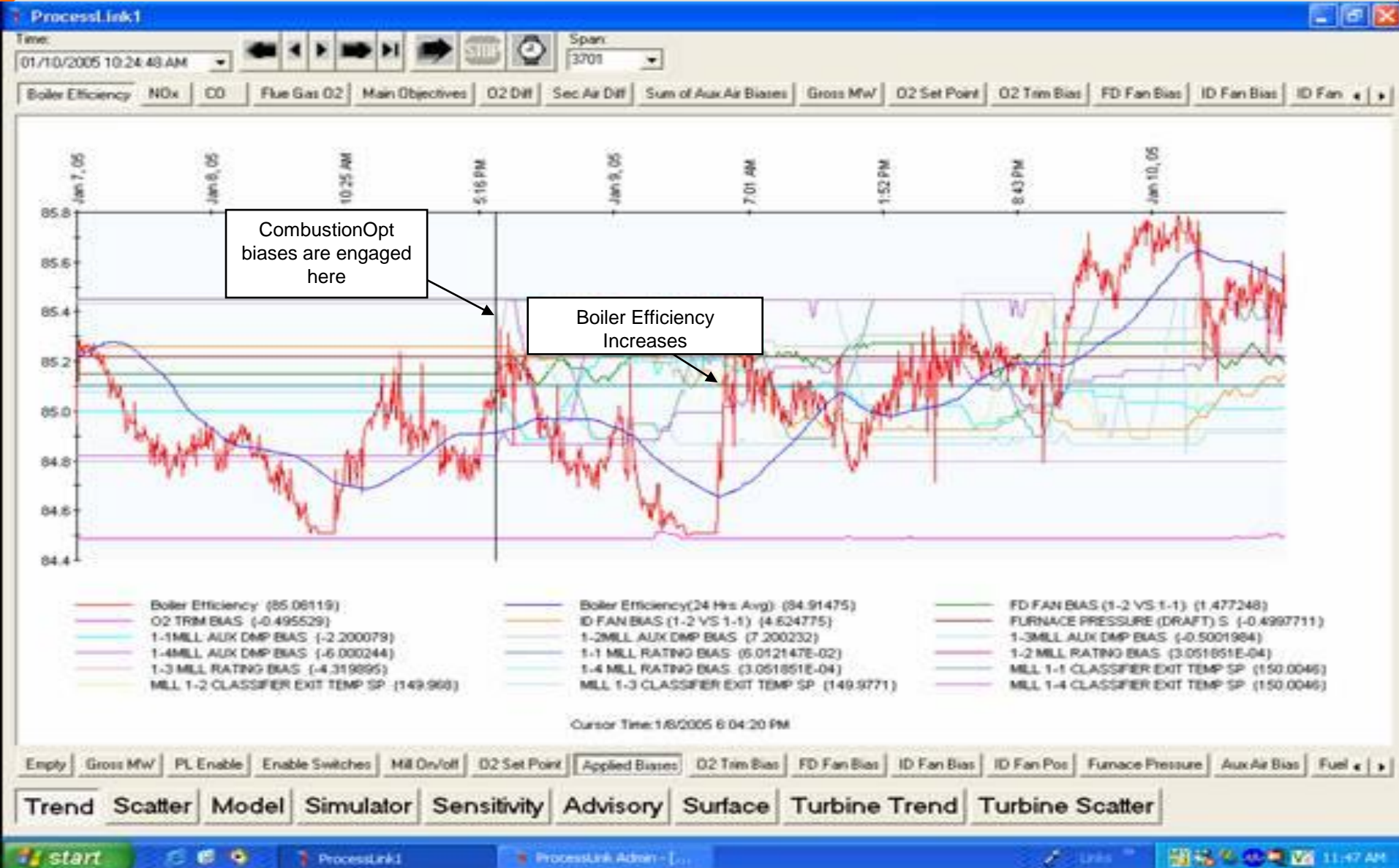


Benefits	vs. Achievable	vs. Baseline
Fuel (\$)	32,848	350,347
NOx (\$)	21,213	41,733

# Impact of Combustion Optimization on Operations & Performance



# Same 600 MW Unit Five Years Later



# SootOpt

- Provides real-time closed-loop optimization of unit performance by manipulating all relevant sootblowing controls
- Expert systems, neural networks & model predictive control
- Improves reliability, heat rate, steam temp & emissions

### Unit 3: SootOpt Home

8/22/2008 11:23 AM (1 day)

#### Optimization Alerts

Issue/Action	Actual	Target	!!!
Some SH boiler IKs 1A, 1, 2 are below minimum required ops	1	0	!!!
Some RH boiler IKs 11-14 are over expected ops	1	0	!!!

#### Optimization Analysis

Last Evaluation: 8/22/2008 11:22:07 AM, Goal: Reduce APH 3A Gas In Temp, Zone: SH\_Economizer, Device: SH12\_72

Blower Select: Model

##### Zone Selection:

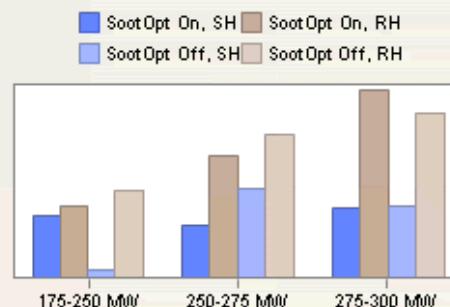
Goal	Zone	Eligible	Applica...
Lower RH Steam Temp	RH_Platen	✗	✓
Lower RH Steam Temp	RH_Furnace	✗	✓
Reduce APH 3A Gas In Temp	SH_Convection	✗	✓
<b>Reduce APH 3A Gas In Temp</b>	<b>SH_Economizer</b>	<b>✓</b>	<b>✓</b>
Reduce APH 3A Gas In Temp	SH_Platen	✓	✓
Reduce APH 3A Gas In Temp	SH_Furnace	✗	✓
Reduce APH 3B Gas In Temp	RH_Furnace	✗	✓
Reduce APH 3B Gas In Temp	RH_Platen	✗	✓

##### Blower Selection:

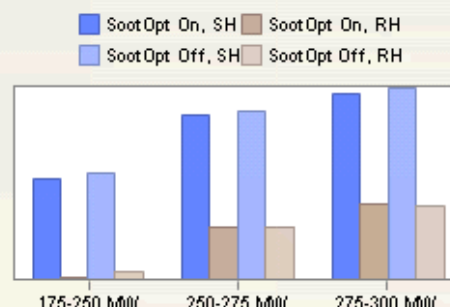
Blower	Eligible	Idle	Rank
SH11_71	✓	●	
SH12_72	✗	●	
SH13_73	✗	●	
SH14_74	✓	●	

#### Optimization Benchmarks

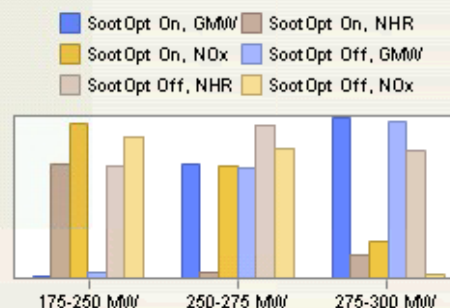
Average Steam Temperatures, SootOpt On vs. Off



Average Gas Temperatures, SootOpt On vs. Off



Average Unit Load, Heat Rate and NOx, SootOpt On vs. Off



# Baldwin 3 SootOpt ON-OFF Comparison

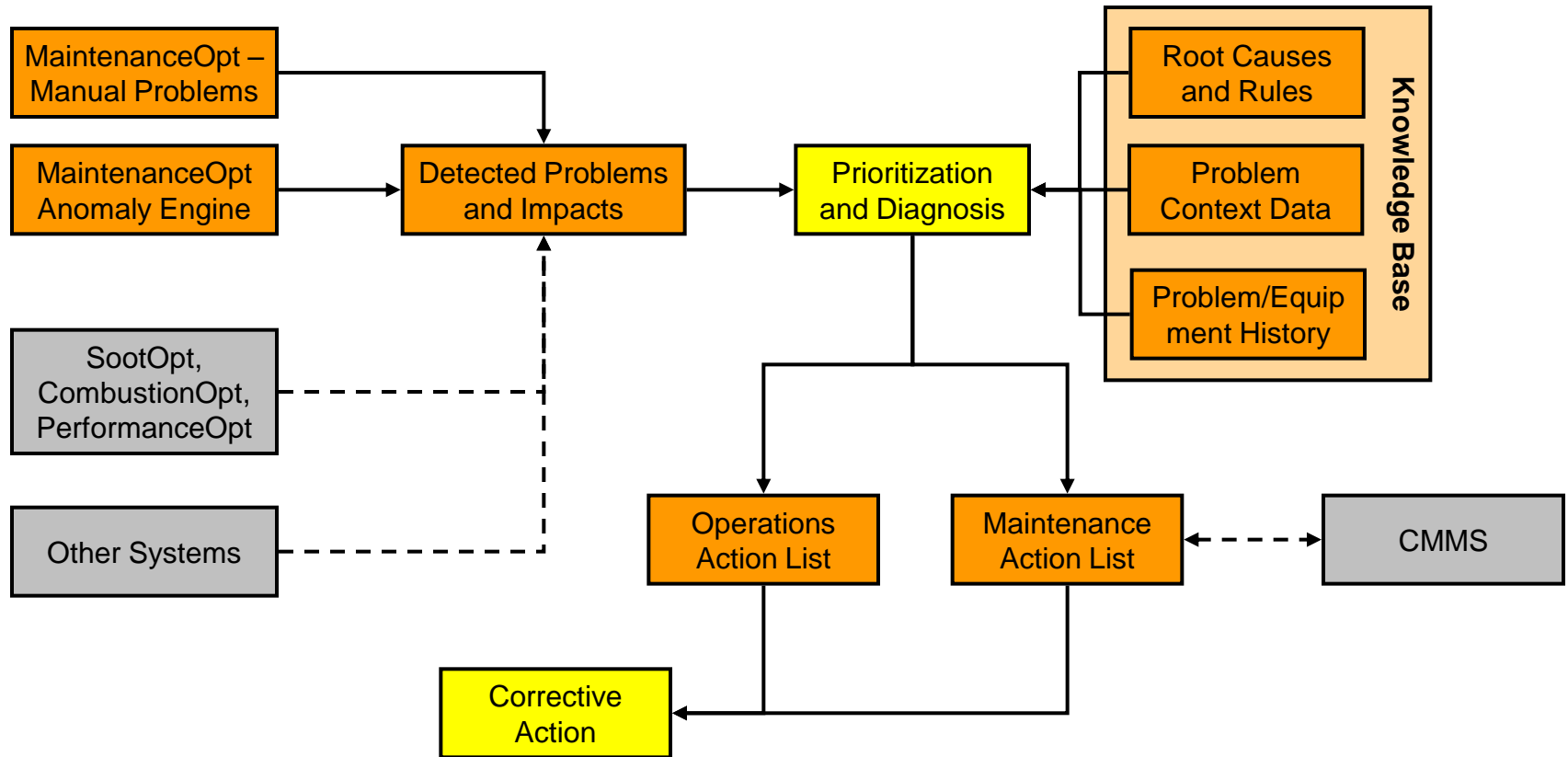
	Soot Off	Soot On	
	Requests per 24hr	Requests per 24hr	Change Percent
PlatSH	15.02	9.03	-39.85
RH	12.84	8.72	-32.09
SecSH	11.66	5.05	-56.70
PriSH	9.99	7.42	-25.76
Econ	7.93	8.09	1.92
Total	<b>57.44</b>	<b>38.31</b>	<b>-33.30</b>
	Avg	Avg	
NOx, lb/MBTU	0.0896	0.0830	-7.36
HR, BTU/kWh	10344.27	10288.96	-0.53

- SootOpt's boiler cleanliness optimization not only reduces heat and emissions, but also results in substantially fewer unnecessary cleaning actions
- Waterwall erosion due to boiler cleaning is the biggest source of tube ruptures
- Tube ruptures represent by far the largest contribution to forced outages and EFOR degradation

# MaintenanceOpt

- Diagnostics clearinghouse for plant anomalies
  - Reports criticality, cause & remedial actions
  - Prioritize and manage problems/resolutions based on impact on profitability
  - Diagnose problem and identify actions based on heuristics and data relevant to root cause analysis
- Neural network detectors & a customized heuristic knowledge-base
- Improves reliability, capacity & heat rate
- Integrates with CMMS to feed work orders and track status

# MaintenanceOpt – How It Works





# Unit 1: MaintenanceOpt Home

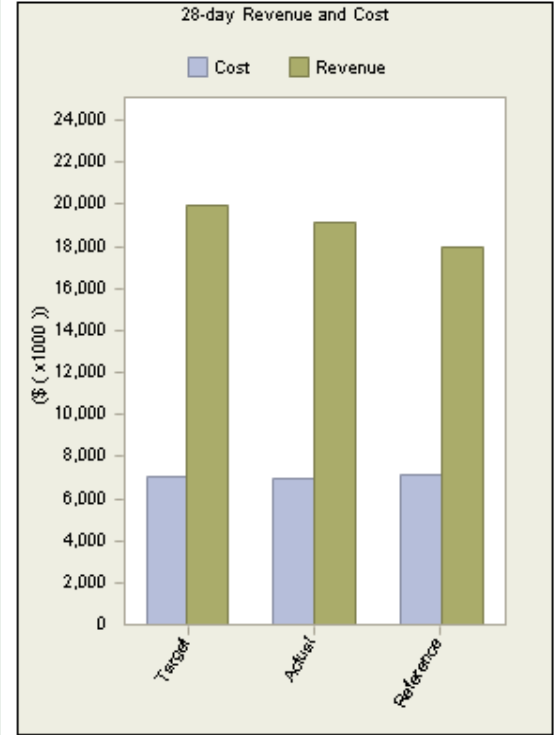
12/15/2007 02:00 PM (2 days)

## Optimization Advice

- Issues to screen (10)
- Problems to diagnose (6)
- Problems to resolve (1)
  - Outage (1)
  - De-rate (0)
  - No de-rate (0)
  - Operations (0)

**Optimization Benchmarking provides a variety of perspectives for both efficiency and capacity benefits**

## Optimization Benchmarks

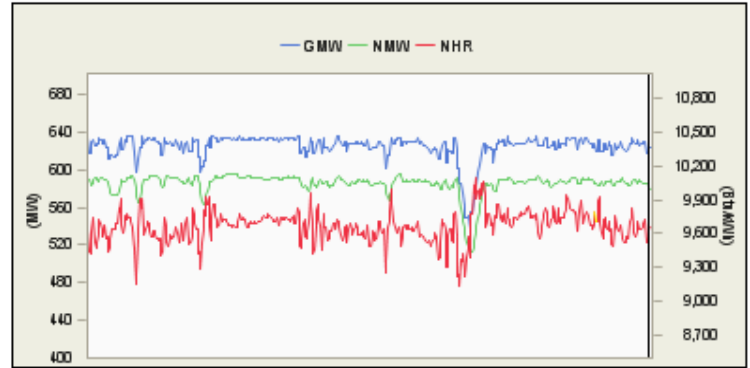


## What's Going on Now and Why

Equipment	Priority of Problems					
	To Diagnose			To Resolve		
	Low	Med	High	Low	Med	High
FWH 1F1			1			
Main Conde...			1			
Aux Conden...			1			
Main Conde...	1					
HP Turbine					1	
Boiler		1				

**Symptoms/problems categorized by workflow stage and equipment category**

Description	Tagname	Expected	Actual	Priority



Benefits	vs. Target	vs. Reference
Cost (\$)	-97,355	240,647
Revenue (\$)	831,203	1,168,811

Responsiveness	Average Age (days)	Target Age (days)
Problems Escalated (13)	0	1
Problems Diagnosed (0)	-	1.5
Problems Resolved (1)	0	4

# Unit 1: MaintenanceOpt Analysis

2 days 12/17/2007 02:00:00 PM

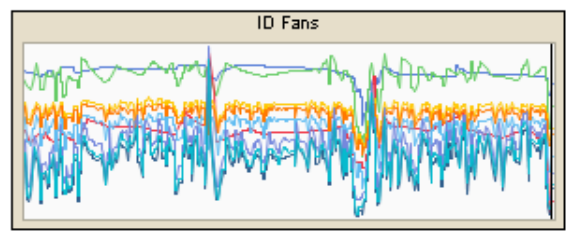
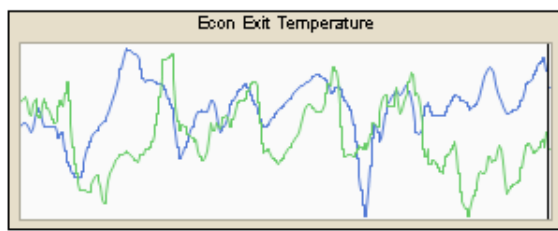
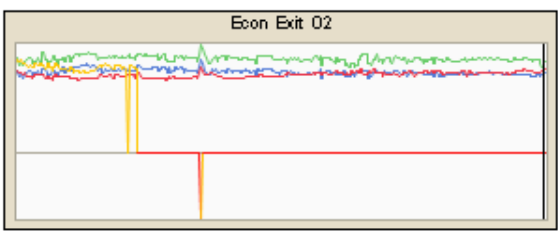
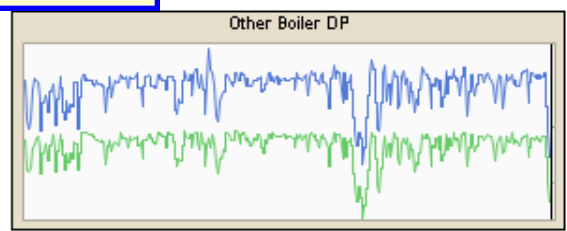
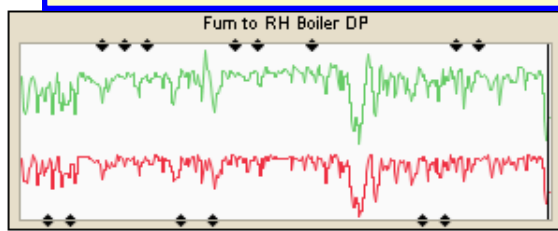
Action List Tools

Issues to screen Problems to diagnose Problems to resolve

Src	Issue	Actual	Target	Pri	Risk	Cost (\$/mo)...	Revenue (\$/mo)...
C'Dpt	1A1 Main Quality 6h Avg < min threshold	25.72	35	Low		NA	-
M'Dpt	High Boiler DP (Furnace to Reheat)(inH2Og)	4.16	3.4	Low		NA	NA
M'Dpt	Auxiliary Power Increase(MW)	41.8	36.9	Low		NA	NA
M'Dpt	High Boiler DP (Furnace to Econ)(inH2Og)	10.72	9.41	Low		NA	NA
C'Dpt	1A5 Main Quality 6h Avg < min threshold	0.25	35	Med		NA	-

**Optimization Advice shows currently triggered symptoms as well as recommended actions and predicted impacts.**

Context Data Attachments Problem History Equipment History



General	Value
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Econ Exit	Value
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**Context data relevant to the highlighted problem**

# Unit 1: MaintenanceOpt Analysis

2 days 12/17/2007 02:00:00 PM

Action List Tools

Issues to screen Problems to diagnose Problems to resolve

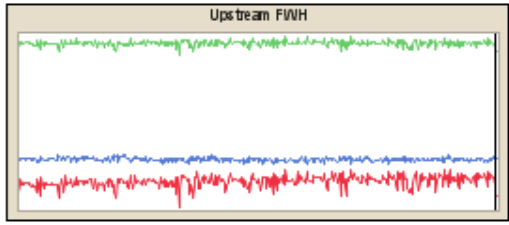
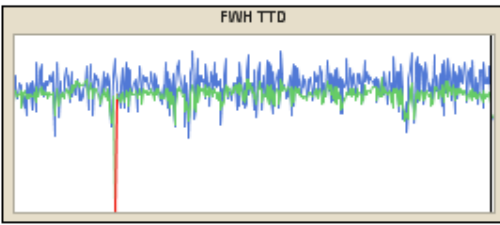
Src	Issue	Actual	Target	Pri	Risk	Cost (\$/mo)...	Revenue (\$/mo)...
P'Opt	Low Condenser 1A Efficiency(%)	54.61	98	Low		6,882	22,121
P'Opt	Low Hot Reheat Temp(degF)	961.67	963.8	Med			
C'Opt	MVs Disabled(percent)	44.64	100	Med			
P'Opt	Low Condenser 1B Efficiency(%)	54.77	98	High			
P'Opt	Low Aux Condenser Efficiency(%)	69.62	85	High			
P'Opt	High FWH 1F1 TTD(degR)	5.63	5.66	High			

**Optimization Advice shows currently triggered symptoms as well as recommended actions and predicted impacts.**

Show Impacts  Show Causes

View Log Add Issue

Context Data Attachments Problem History Equipment History



FWH (F)	Actual	Achievable
TTD	5.47	5.4
TR	39.28	39.36
DCA	4.86	4.95

Upstream FWH (F)	Actual
TTD	15.82
TR	34.16
DCA	9.41

Flow (klb/h)	Actual
FW Flow Rate through Heater	1,493.82
FWH Extraction Flow	51.92
Primary Flow Rate Difference	0

Cleanliness (%)	Actual	Achievable
Condenser	53.05	85
FWH	62.52	70

Temperature (F)	Actual
Emergency Drain	0
FWH Tube Outlet	398.35
FWH Outlet Minus Downstream Inlet	0
FWH Shell Inlet	814.58
FWH Tube Inlet	357.8
FWH Drain Outlet	361.5
Turbine Extraction	635.57

Other Data	Actual
Level Normal Drain Valve Position	50 %
Emergency Drain Valve Position	0 %
Heater Level	9.37 in
Heater OOS Status	1
Heat Rte Impact (Btu/kWh)	0.01



**Context data relevant to the highlighted problem**

# Unit 1: MaintenanceOpt Analysis

2 days 12/17/2007 02:00:00 PM

Action List Tools

Issues to screen **Problems to diagnose** Problems to resolve

Src	Issue	Actual
P'Opt	Low Condenser 1A Efficiency(%)	54.61
P'Opt	Low Hot Reheat Temp(degF)	961.67
C'Opt	MVs Disabled(percent)	44.64
P'Opt	Low Condenser 1B Efficiency(%)	54.77
P'Opt	Low Aux Condenser Efficiency(%)	69.62
P'Opt	High FWH 1F1 TTD(degR)	5.63

- Likely causes**
1. Leaking Bypass Valve
  2. Partially Open Bypass Valve
  3. Tube Leak
  4. Cycle Isolation Error (Affects Calcul
  5. Excessive Extraction Line Pressure [
  6. High Water Level
  7. Excessive Vent Orifice Flow
  - 9. Leaking Division Plate**
  8. Shell Side Air Blanketing
  10. Dirty Heater
  11. Internal Shell Side Leak

**Diagnostic rule**

IF

- FWH TTD gradual increase.
- FWH TR decrease.
- Level Normal Drain Valve Position is normal or open less than normal.
- FWH Emergency Drain Valve Position is closed.
- FWH Extraction Flow Rate is lower than normal.

AND further investigation indicates

- Bypass valve is closed and temperature drop does not exist from FWH outlet across bypass re-entrance.

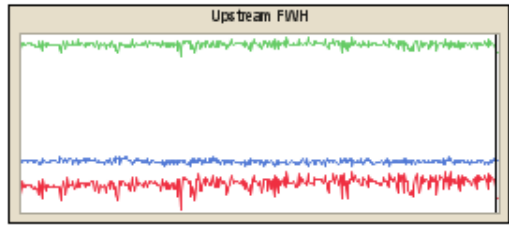
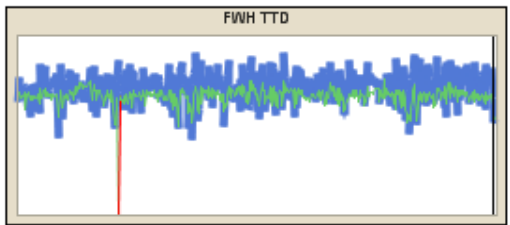
THEN

There is a leaking division plate. Schedule heater

Show Impacts  Show Causes

View Log Add Issue

Context Data Attachments Problem History Equipment History



FWH (F)	Actual	Achievable
TTD	5.47	5.4
TR	39.28	39.36
DCA	4.86	4.95

Upstream FWH (F)	Actual
TTD	15.82
TR	34.16
DCA	9.41

Flow (klb/h)	Actual
FW Flow Rate through Heater	1,493.82
FWH Extraction Flow	51.92
Primary Flow Rate Difference	0

Cleanliness (%)	Actual	Achievable
Condenser	53.05	85
FWH	62.52	70

**Condition-based diagnostics support for each symptom and associated set of root causes from ProcessLink knowledgebase and rules-engine**

FWH Outlet Minus Downstream Inlet	0
FWH Shell Inlet	814.58
FWH Tube Inlet	357.8
FWH Drain Outlet	361.5
Turbine Extraction	635.57

Other Data	Actual
Level Normal Drain Valve Position	50 %
Emergency Drain Valve Position	0 %
Heater Level	9.37 in
Heater OOS Status	1
Heat Rte Impact (Btu/kWh)	0.01

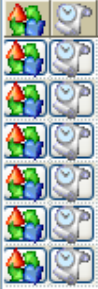


# Unit 1: MaintenanceOpt Analysis

2 days 12/17/2007 02:00:00 PM

Action List

Issues to



Show

Context



TTD  
TR  
DCA

FW F  
FW B  
Primar

### Change Status

Specify Action

Issue: High FWH 1F1 TTD

Priority: High

Indicator:

Equipment: FWH 1F1

Cause: 9. Leaking Division Plate

Reliability Risk: High

Action:

Timing: Outage

Action: There is a leaking division plate. Schedule heater repair.

Supporting Data

Diagnostic Information:  
 FWH TTD gradual increase.  
 FWH TR decrease.  
 Level Normal Drain Valve Position is normal or open less than normal.  
 FWH Emergency Drain Valve Position is closed.  
 FWH Extraction Flow Rate is lower than normal.  
 Bypass valve is closed and temperature drop does not exist from FWH outlet across bypass re-entrance.

Comments

This is an instrumentation problem (not in real-time)

OK Cancel

### Diagnostic rule

IF

- FWH TTD gradual increase.
- FWH TR decrease.
- Level Normal Drain Valve Position is normal or open less than normal.
- FWH Emergency Drain Valve Position is closed.
- FWH Extraction Flow Rate is lower than normal.

AND further investigation indicates

- Bypass valve is closed and temperature drop does not exist from FWH outlet across bypass re-entrance.

THEN

There is a leaking division plate. Schedule heater repair.

View Log Add Issue

### Temperature (F)

Parameter	Actual
Emergency Drain	0
FWH Tube Outlet	398.35
FWH Outlet Minus Down	
FWH Shell Inlet	
FWH Tube Inlet	
FWH Drain Outlet	
Turbine Extraction	635.57

HP FWH

Condenser

### Other Data

Parameter	Actual
Level Normal Drain Valve Position	50 %
Emergency Drain Valve Position	0 %
Heater Level	9.37 in
Heater OOS Status	1
Heat Rte Impact (Btu/kWh)	0.01

Turbine

Can specify default or custom actions and change status or priority

# PerformanceOpt

- Identifies performance bottlenecks, their efficiency & capacity impacts & actionable advice
- 1st Principles model of unit with continual background simulations
- Improves efficiency, reliability, heat rate & capacity
- Prioritization based on monetized impacts
- Integrated with the other optimizers
  - Coal quality information to CombustionOpt
  - Boiler cleanliness information to SootOpt
  - Accurate problem impact assessments to MaintenanceOpt



# Deseret: PerformanceOpt Home

## Optimization Advice

- Symptom**
- FWH 3 TTD Degradation
  - FWH Ext Pressure Sensor 1A-1B Devic**
  - FWH 4 DCA Degradation
  - FWH 6 DCA Degradation
  - FWH 4 TTD Degradation

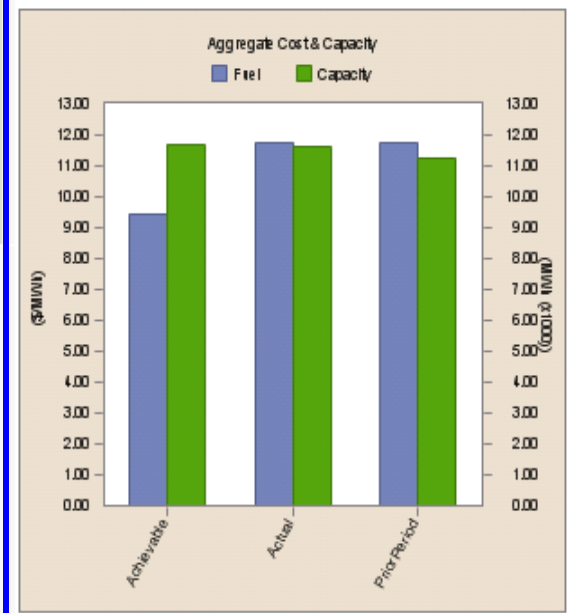
**Optimization Benchmarking provides a variety of perspectives for both efficiency and capacity benefits**

**Optimization Advice shows currently triggered symptoms as well as recommended actions and predicted impacts.**

## Controllable Losses

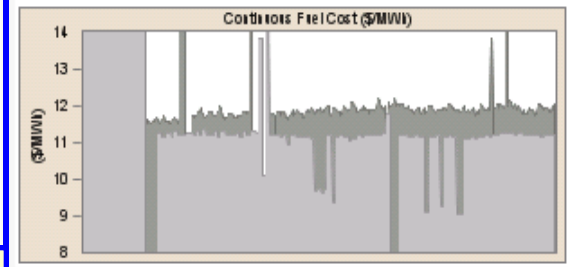
Controllable Losses			
Throttle Pressure (psig)			
Throttle Temperature (degF)			
Upper (1st) SH Spray Flow (klb/h)			
Lower (2nd) SH Spray Flow (klb/h)	58.8	34.1	24.7
Reheat Temperature (degF)	1,012	1,000	12
Reheat Spray Flow (klb/h)	11.6	11.2	0.4
Final Feedwater Temperature (degF)	428	424	4
Condenser Backpressure (inHg)	2.71	2.68	0.02
Hotwell Subcooling (deltaF)	-0.1	0.0	-0.1
Air Heater Gas Inlet Temperature (degF)	697	673	24
AH Cold End Average Temperature (degF)	176	190	-14
Air Heater Gas Inlet O2 (%)	3.0	2.7	0.3
Air Heater Leakage (%)	33	10	23
Auxiliary Power (MW)	27.9	29.0	-1.1

## Optimization Benchmarks



Potential benefits	\$	\$/MWh
Fuel	26,766.94	2.3
Capacity		42.37

**Performance indicators that are important to you are monitored and highlighted based on triggered symptoms**



**You can click on any of these equipment icons to go to the page containing data about that piece of equipment**

# Unit 1: PerformanceOpt Analysis

1 day [Navigation Icons] 06/26/2007 11:30:5

Equipment Trend

Boiler Steam Turbine Condenser Condensate Pump CW Pump FWH AB FWH CD BF Pump FWH FG Air Heater

	Current	Act
Net Heat Rate	9,865.13	9,865.13
Gross MWV	587.76	587.76

Steam	SH	RH
Flow (klb/h)	4,048.68	3,599.09
Temp (F)	1,000.21	950.58
Pressure (psia)	2,506.41	529.97

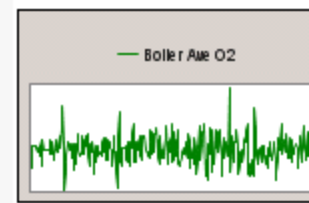
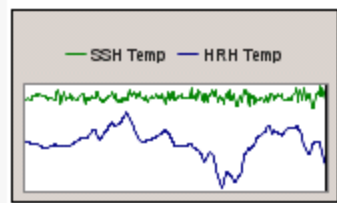
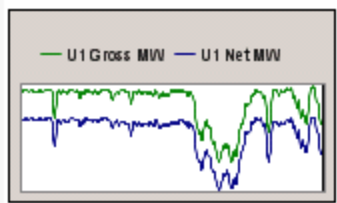
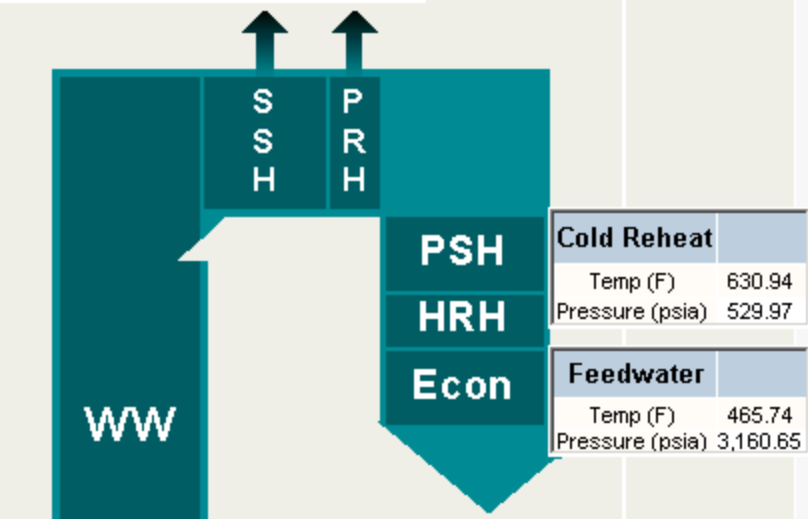
Efficiency Losses	MBtu/h	%
Dry gas loss	311.05	5.79
Water from H2 in fuel	215.68	4.02
Water from H2O in fuel	204.03	3.8
Moisture in air loss	5.24	0.1
Unburned carbon loss	27.38	0.51
Sensible Q in refuse	8.92	0.17
Radiation loss	5.1	0.09
<b>Total losses</b>	<b>777.42</b>	<b>14.48</b>

Unit 1 Performance	Actual	Target
Gross MWV	587.76	587.76
Net MWV	548.43	548.43
Gross HR	9,131.82	9,131.82
Net HR	9,865.1	9,865.1
Boiler Eff - I/O (%)	87.93	87.93
Boiler Eff - Losses	85.7	85.7

Efficiency Credits	MBtu/h	%
Dry Air Credit	60.45	1.13
Moisture in Air Credit	1.04	0.02
Sensible Heat in Fuel	0	0
<b>Total Credits</b>	<b>61.49</b>	<b>1.15</b>

Zone	Q (MBtu/h)	Clean (%)	T Out (deg F)	Clean (exp)	T Out
Economizer	485.03	99.14	570.2	83.45	540
Water Wall	2,057.12	76.94	689.8	76.89	680
Primary SH	443.01	70.05	725.6	83.45	720
Secondary SH	1,088.8	94.25	1,000.2	85.45	990
Reheater	641.67	71.06	950.6	81.45	970

Heat Input	
Meas Coal Flow (klb/h)	656.63
Model Coal Flow (klb/h)	622.12
Model Coal Ratio	0.95
Meas Duty (mmBtu/h)	5,668.1
Model Duty (mmBtu/h)	5,370.2
Entered HHV (Btu/lb)	8,740
Corrected HHV (Btu/lb)	8,632.18





# Unit 1: UnitAdvisor

10/8/2007 06:36 PM (1 day)

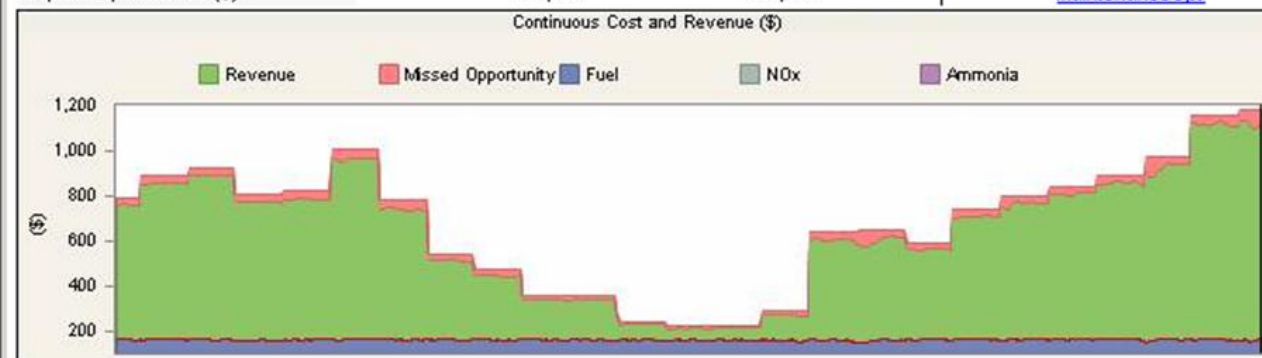
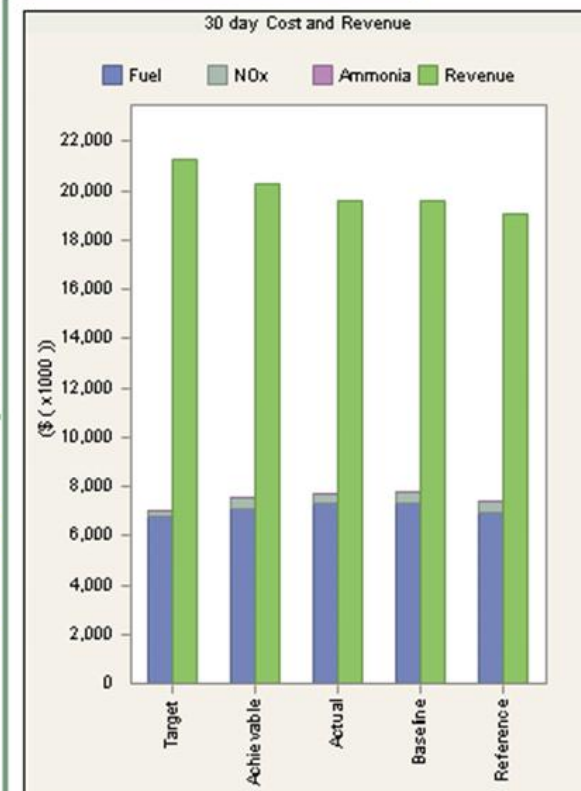
## Optimization Advice

Issue/Action	Timing	Risk	Cost (\$/mo)	Revenue (\$/mo)
Low Hot Reheat Temp		●	18,391	300,438
Low Condenser 1B Efficiency		●	28,950	98,020
Low Condenser 1A Efficiency		●	25,267	85,693
Main Condenser 1B Backpressure De...		●	8,224	55,043
Main Condenser 1A Backpressure De...		●	7,199	46,274
Issues to screen (10)		●	17,368	104,852
Problems to diagnose (7)		●	81,132	496,545
Problems to resolve (1)		●	10,808	36,490

## What's Going on Now and Why

KPIs	Actual	Expected	Delta	Primary Optimizers
NOx (lb/MBtu)	0.065	0.070	■	<a href="#">CombustionOpt</a> , <a href="#">SootOpt</a>
Ammonia (lb/h)	455	460	■	<a href="#">CombustionOpt</a> , <a href="#">SootOpt</a>
Heat Rate (Btu/kWh)	10,567	10,000	■	<a href="#">PerformanceOpt</a>
CO2 (ton)	2,121	2,020	■	<a href="#">PerformanceOpt</a>
Opacity Excursions (%)	30	35	■	<a href="#">CombustionOpt</a> , <a href="#">SootOpt</a>
Availability (%)	92	100	■	<a href="#">MaintenanceOpt</a>
Revenue (\$)	1,965,427	1,950,000	■	<a href="#">MaintenanceOpt</a>
Capital Expenditures (\$)	850,000	850,000	■	<a href="#">MaintenanceOpt</a>

## Optimization Benchmarks



Benefits	vsTarget	vsAchieve	vsBase	vsRef
Fuel	487,964	177,709	22,423	-349,650
NOx	--	12,214	5,144	--
NH3	--	8,004	6,223	--
Revenue	1,674,427	702,810	--	523,931

# Optimization: Won't Solve the Problem but Part of GHG Solution

- Achieve lowest-cost CO<sub>2</sub> reductions
- Demonstrate proactive commitment
- Simultaneously achieve operations improvements:
  - Reduced NOx and/or reagent costs
  - Improved control over CO and opacity
  - Increased reliability and commercial availability
- Newer regulations (based on tons and not lb/mmBtu rates) mean that every incremental heat rate improvement results in fewer tons of CO<sub>2</sub>, SO<sub>2</sub>, and Mercury