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GE Energy Services

Edward G. Barry
Sales Manager

GE Energy Services
General Electric International, Inc.(GEII)
3020 E. Camelback Road, Phoenix, Suite 360,
Phoenix, AZ 85016
602-224-7142 / Fax 602-224-7166
Email: edward.barry@ps.ge.com

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Salt River Project
Attn: Larry Wilson
PO Box 52025
Phoenix, AZ 85072-2025

**Subject: SRP Santan Combustion Testing Services
Estimates of Emissions on Ultra Low Sulfur Fuel**

Dear Larry,

This letter is to document to SRP emissions expectations from the burning of EC1 liquid fuel at Santan Units 1 – 4 per our discussions last month. We are confident that based on our experience that a test is not needed to provide the emission estimates.

Based on fuel analysis reports and fuel specifications for low sulfur diesel, CARB diesel, and ultra low sulfur fuel oil (EC1), we find that the physical properties of the fuels are substantially similar, such that emissions of CO, PM10, and VOC should be effectively identical. Expected NOx emissions on EC1 fuel are slightly less (approximately 3-4%) than the other fuels because of EC1's lower nitrogen content. Expected SO2 emissions, however, will be significantly lower than the other fuels based on the maximum sulfur content for each fuel. The maximum sulfur content of the fuels and the expected emissions for each fuel at those sulfur levels are presented in the following table.

	<u>Low Sulfur Fuel Oil</u>	<u>CARB Diesel</u>	<u>EC1</u>
Maximum Fuel Sulfur Content (ppm)	500	500	15
Estimated Emissions (lb/MMBtu)	0.0533	0.0533	0.0016

Sincerely,



Ed Barry