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CastleLight Energy Corp

3401 W 5th Street 3200
Oxnard, CA 93030



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March 31, 2017

Secretary Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W. – Office 1101A
Washington, DC 20460

*FYI - Mr Andy Tobun
Arizona Corporate Commission*

Subject: American Jobs & the Coal-fired Navajo Generating Station

Reference: Letter to Secretary Ryan Zinke, Department of Interior – March 2, 2017

Dear Secretary Pruitt:

..... *Find a way or make one. We have.....*

President Trump's vision of creating new American jobs and saving U.S. coal-fired power plants epitomizes the perfect challenge – and solution – made possible through American ingenuity. Please see the referenced letter to Secretary Zinke regarding the **Navajo Generating Station**.

Challenge: The Utility owner-operators of the 2,250 MW coal-fired **Navajo Generating Station** (NGS) in Page, AZ plan to close the power plant – amid claims that the coal-fired plant cannot cost-compete with natural gas and afford the modifications to meet the EPA HAZE Rule. (Additional emissions control technology to reduce NOx from ~170 ppm (parts per million) to ~40 ppm is estimated to cost \$1.1 Billion (~\$733/kW), plus \$20 million /yr increased operating cost. Note that many other coal-fired power plants are also severely impacted by this regulation.

Solution: A more cost effective initiative would be to challenge the EPA HAZE Rule. When you have a moment, please review the HAZE Rule. We believe you will confirm that this rule is "very subjective". There are many natural sources of atmospheric haze, such as from plants, trees and occasional wild fires. And the reduction in HAZE from ~130 ppm NO_x emissions reduction (@~\$8.5 million / ppm) will not be measurable.

America has the technology and expertise to create jobs and energy independence.

Please let us know how we can help.

Sincerely,

Keith Moore - President

- Cc: Secretary Ryan Zinke - U.S. Department of Interior,
- Secretary Rick Perry - U.S. Department of Energy
- Mr. David Palumbo - U.S. Bureau of Reclamation
- Mr. Russell Begaye - President, Navajo Nation
- Senator John McCain - AZ
- Senator Jeff Flake - AZ
- Congressman Tom O'Halleran – AZ
- Mrs. Kellyanne Conway – c/o White House

Arizona Corporation Commission
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March 2, 2017

Secretary Ryan Zinke
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

RE: American Jobs & the Coal-fired Navajo Generating Station

Dear Secretary Zinke:

..... *Find a way or make one. We have.....*

President Trump's vision of creating new American jobs and saving U.S. coal-fired power plants epitomizes the perfect challenge – and solution – made possible through American ingenuity.

Current Challenge: Utility owner-operators* of the 2,250 MW coal-fired **Navajo Generating Station** (NGS) in Page, AZ plan to close the power plant – amid claims that the coal-fired plant cannot cost-compete with natural gas.

Solution: Instead of scrapping the plant, we suggest the **Navaho Nation** team with the **U.S Bureau of Reclamation** and acquire ownership of the plant to maintain its operation through 2044. Further, re-engineer the plant with 21st century technology for improved efficiency and lower pollutant emissions.

Results: More new American jobs and profitable clean coal-fired electricity generation that:

- 1.) Provides the **Navaho Nation** employment and lease and coal production income.
- 2.) Provides **Central Arizona Project** reliable low-cost energy for its water supply.
- 3.) Significantly improves NGS efficiency (burn less coal; reduced operating cost and CO₂), with very low SO₂ & NO_x pollutant emissions. *For more information, please see our Brochure and Publication enclosed.*

America has the technology and expertise to create jobs and energy independence..

Please let us know how we can help.

Sincerely,



Keith Moore - President

CastleLight Energy Corp.

011-805-551-0983/ Keith@Castle-Light.com

Melbourne F. Giberson, Ph.D., P.E. - President

TRI - Turbo Research, Inc.

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*The present owners of NGS are:

- **Salt River Project** (42.9%) and is the plant operator.
- **U.S. Bureau of Reclamation** owns 24.3%, = ~\$14.9 million
- **Arizona Public Service Co.** (14%)
- **Tucson Electric Power Co.** (11.3%)
- **NV Energy** (7.5%) NV Energy has already plans to exit the plant.

The present value of NGS is estimated at \$61.3 million, based on the recent sale of **Los Angeles Department of Water and Power's** 21.2 % share to SRP for \$13 million. NGS ownership to the **Salt River Project** for \$13 million (= \$27.25 /kW) .

We suggest the **Navajo Nation** and **U.S. Bureau of Reclamation** may buy out the remaining NGS owners for only; **\$46.4 million** (\$61.3M - \$14.9M). Note that it will be necessary to maintain the plants Title V operating permit.

Cc.: Mr. Russell Begaye – President, Navajo Nation
Congressman Tom O'Halleran – AZ
Mr. David Palumbo - U.S. Bureau of Reclamation
Mrs. Kellyanne Conway – c/o White House
Secretary Rick Perry – Secretary U.S. Department of Energy
Senator John McCain - AZ
Senator Jeff Flake - AZ

Publication: *“Initiative to Save America’s Jobs” Maintain our Coal-fired Electric Generating Fleet and Protect the Electric Grid”*

Brochure: *“The Clean Combustion System”*