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Dear Richard,

Industrial Emissions Directive – Large Combustion Plants – Transitional National Plan – Application for Inclusion of Plants

We refer to your letter to operators dated 28 December 2011. This reply is made on the basis of the terms and conditions applying to the UK Transitional National Plan (TNP), as set out in that letter.

Plants to be included

We are writing to confirm that at this time, E.ON would like a number of Large Combustion Plants (LCPs) to be included in the UK Transitional National Plan for the pollutants specified in Table 1.

The letter also request operators specify "the measures foreseen [for each plant in the TNP] in order to ensure timely compliance with the emission limit values that will apply from 1 July 2020". In all cases, E.ON's current view is that these plants will achieve compliance by this date with the Emission Limit Values that apply under Annex V, through the application of the necessary pollution abatement techniques.

However, both the compliance route and measures foreseen may be subject to review and amendment, as set out in more detail in the notes below.

Calculation of Transitional National Plan Annual Emission Limits for Plants to be included

For each of the Large Combustion Plants to be included in the Transitional National Plan, the applicable Annual Emission Limits and supporting calculations are set out in the attached TNP workbook, which has been accepted by Government without prejudice to the conduct of such final checks of the calculations as may be necessary during the compilation of the draft UK TNP or in responding to European Commission comments on the plan after it is submitted. Comments have been included on the front sheet of each workbook if there are any issues where further guidance or clarification from DEFRA may be required.

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Review of Options for Compliance with the Industrial Emissions Directive and Possible Future Amendments to Measures Foreseen

This declaration is made subject to future reviews by E.ON of the appropriate compliance option for the plants under the Industrial Emissions Directive.

These reviews will be necessary because of a high level of uncertainty on the future operation and investment in the plants, due to factors including:-

- The outcome of the current LCP BREF review, which will set BAT for all Large Combustion Plants and will not be finalised until 2015.
- The outcome of the reviews of the Gothenburg Protocol and National Emissions Ceilings Directive for 2020 national ceilings and the ensuing implications for LCPs.
- The outcome of the UK Electricity Market Reform currently in progress and the impact on the future UK electricity market.
- The carbon price in future years.
- The effect of increasing levels of intermittent renewable generation on national generation capacity requirements.

All these factors could have a profound impact on the future operation and investment in electricity generating LCPs. The outcome of each is uncertain. It will be essential that we review our plans for the operation of our plants post 2015 on a regular basis and update them as necessary in the light of changes to regulatory and commercial circumstances.

Consequently, and in accordance with the points of note set out in your letter of 28 December 2011, we reserve the right:-

- to alter both the measures foreseen and the compliance route on exit from the Transitional National Plan;
- to bring forward a plant exit from the Transitional National Plan, prior to 30 June 2020;
- to exit the Transitional National Plan and place plants in the Limited Life Derogation under Article 33 of the Industrial Emissions Directive, prior to the specified deadline for decisions on this derogation of 1 January 2014.
- to propose further plants for inclusion in the Transitional National Plan.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Table 1: E.ON plants to be included in the UK Transitional National Plan

Name of plant	Address	LCP description	Pollutant			E.ON LCP ref
			NO _x	SO ₂	Dust	
Castleford Power Station	Wheldon Road, Castleford, West Yorkshire. WF10 2JT	Gas Turbine and Heat Recovery Steam Generator	✓	n/a	n/a	EONLCP1
Cottam Development Centre (CDC)	Cottam, Retford, Nottinghamshire. DN22 0TF	Gas Turbine and Heat Recovery Steam Generator	✓	n/a	n/a	EONLCP2
Citigen CHP	47-53 Charterhouse Street, London. EC1M 6BP	Gas engines 1 & 2	✓	n/a	n/a	EONLCP3
Connah's Quay Power Station	Kelsterton Road, Connahs' Quay, Deeside, Flintshire. CH5 4BP	Unit 1	✓	n/a	n/a	EONLCP4
		Unit 2	✓	n/a	n/a	EONLCP5
		Unit 3	✓	n/a	n/a	EONLCP6
		Unit 4	✓	n/a	n/a	EONLCP7
Enfield Power Station	111 Brancroft Way, Brimsdown, Enfield, Middlesex, EN3 7PL	Gas Turbine and Heat Recovery Steam Generator	✓	n/a	n/a	EONLCP8
Kemsley CHP	Kemsley, Sittingbourne, Kent ME10 2TD	Gas Turbine plus Waste Heat Recovery Boilers A & B	✓	n/a	n/a	EONLCP9
		Package boilers A, B and C	✓	n/a	n/a	EONLCP10
		Package boilers D, E and F	✓	n/a	n/a	EONLCP11
Killingholme Power Station	Chase Hill Road, North Killingholme, North East Lincolnshire DN40 3LU	Gas Turbine 11	✓	n/a	n/a	EONLCP12
		Gas Turbine 12	✓	n/a	n/a	EONLCP13
		Gas Turbine 21	✓	n/a	n/a	EONLCP14
		Gas Turbine 22	✓	n/a	n/a	EONLCP15
Port of Liverpool CHP	Regent Road, Bootle. L20 1ED	Gas Turbine	✓	n/a	n/a	EONLCP16
		Package boilers 1-3	✓	n/a	n/a	EONLCP17
Ratcliffe-on-Soar Power station	Ratcliffe on Soar, Nottingham, Nottinghamshire. NG11 0EE	Units 1-4	✓	✓	✓	EONLCP18
Sandbach Power Station	Booth Lane, Elworth, Sandbach, Cheshire. CW11 3PZ	Gas Turbine and Heat Recovery Steam Generator	✓	n/a	n/a	EONLCP19
Stoke CHP	Campbell Road, Stoke-on-Trent. ST4 4EW	Gas Turbines 1 & 2 and Heat Recovery Steam Generators 1 & 2	✓	n/a	n/a	EONLCP20
		Package boilers 1-3	✓	n/a	n/a	EONLCP21
Thornhill Power Station	Calder Road, Ravensthorpe, Dewsbury, West Yorkshire. WF12 9EA	Gas Turbine and Heat Recovery Steam Generator	✓	n/a	n/a	EONLCP22
Winnington CHP	Winnington Lane, Northwich, Cheshire. CW8 4GX	Gas Turbines 1 & 2 and Heat Recovery Steam Generators 1 & 2	✓	n/a	n/a	EONLCP23
		Package boilers 1-3	✓	n/a	n/a	EONLCP24