Northern Colorado Partners for Clean Energy (NCP4CE)
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https://colivableclimate.org/noco-partners-for-clean-energy

April 9th, 2026

Dear Director Ogletree and APCD Staff-

Northern Colorado Partners for Clean Energy (NCP4CE) thanks you for this opportunity to comment on the revisions to the draft permit for the new gas turbines at the Rawhide Power Station. NCP4CE represents ten citizen groups in Fort Collins, Loveland, Longmont, and Estes Park.

It is an improvement that you set an annual fuel cap for operation of all 5 turbines, but with an allowance of about 45% of total potential capacity, it seems that permitting fewer turbines could be easily done. This could potentially save the PRPA customers from such large rate increases if only 3 turbines were built instead of 5. In addition, it would help to ensure that hazardous air pollutants would not exceed allowable limits. Turbines that do not exist cannot emit.

The most troubling part of the revised permit is the seasonal allowances and their implications for summer ozone pollution.

Quarterly fuel caps for the five turbines combined:

- Dec–Feb: **2,622,429 MMBtu**
- Mar–May: **1,311,215 MMBtu**
- Jun–Aug: **3,496,572 MMBtu**
- Sep–Nov: **1,311,215 MMBtu**

Using 447.7 MMBtu/hr full-load rate, that works out to roughly:

- **Winter:** 5,857 combined full-load hours
- **Spring:** 2,928
- **Summer:** 7,809
- **Fall:** 2,928

A 92-day summer quarter has:

- **92 × 24 × 5 = 11,040 possible five-turbine hours**

The permit allows about:

- **7,809 / 11,040 = 70.7% of full five-turbine continuous operation in summer**

This is backwards to what the limits should be if the goal is to provide protection from increased ozone pollution during the summer “ozone season”. The current limits allow for the most emissions when the air quality impacts are the most severe. The cap **should be lowest** during the summer. Although load is higher in the summer, so is production from PRPAs solar assets! Solar, wind and batteries do not produce hazardous air pollutants.
This raises a critical regulatory issue. The permit allows a high-emissions operating scenario during the ozone season, but the analysis supporting the permit does not clearly demonstrate that it fully evaluates this level of utilization. If the project is authorized to operate at these levels, then that scenario must be reflected in the determination of whether the project results in a significant net emissions increase and significant deterioration of our air quality.

Additionally, compliance with (new, adjusted) seasonal limits (as well as annual limits) should be required for the life of the turbines, not just during the first 12 months.

I respectfully request that you consider making these additional changes to the draft permit:

- Reevaluate the seasonal fuel cap limits to ensure that they do not allow peak emissions during the ozone season
- Demonstrate that the PSD applicability determination reflects the maximum level of operation authorized under the permit
- Ensure that any operational limits are enforceable and apply for the full operational life of the turbines.

Thank you for your consideration and your service in attempting to protect air quality in Colorado.

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