

\*\*Note: Obvious typos (missing spaces, misspellings, etc.) are not included in this list. Additional changes may be made to commented text changes to resolve grammar, acronyms, stylization, etc.\*\*

#	Commenter	Comment	LAI Response
1	Natural Gas Supply Association	Should the title be “Fuel Assurance: Dual Fuel Capability versus Firm Transportation?” instead of with an “and.”	Change rejected – language preference
2	Natural Gas Supply Association	In section “4.2 ULSD Market Implications,” pages 36-37, the discussion is very positive on the future of the ULSD market, however, it does not indicate whether the ULSD market could meet generator demand on short-notice replenishment during a longer than two- or three-day (the average back-up storage capacity for new SC or CC plants, respectively) peak winter heating demand period. There is a statement on the bottom of page 37 stating that “the key to assuring sufficient supplies of ULSD to meet generator needs during peak winter periods will involve a combination of transportation scheduling and maintaining adequate on-site supplies going into the winter season.” Does that mean that for longer, sustained cold periods the delivery of ULSD delivery may not be able to “keep up” without prior transportation of supply assurances?	New paragraph inserted after referenced sentence: <u>“During extended periods of extreme cold weather, the ULSD supply chain is capable of providing timely back-up fuel replenishment in most parts of the Study Region. Keeping up with ULSD burns during extreme weather events will depend on the plant’s ULSD on-site storage capacity and unloading facilities as well as the size of the plant. The primary constraint for resupplying large plants is likely to be local restrictions on truck traffic, not the availability of ULSD. Since the management of new plants will be aware of such restrictions, the on-site storage capacity for ULSD could be increased accordingly at the time of the plant’s construction. The incremental cost of expanded ULSD storage capacity is relatively low.”</u>
3	Natural Gas Supply Association	In the “6.9 Conclusions” section, I would recommend adding a paragraph incorporating some of the key items needed to have a properly working back-up system that are detailed in the report including in the Executive Summary. The Conclusion currently only provides the primary economic reasons supporting generator fuel assurance through dual fuel capability versus FT without also adding some of the caveats that were discussed in the body of the report such as dual-fuel’s environmental operating limits, zoning requirements as well as the need to have a sufficient combination of transportation scheduling and on-site supplies for peak winter days.	New paragraph inserted on page 90: <u>“The extensive use of ULSD as a back-up fuel for SC and CC plants will be impacted by more than the improved availability of ULSD. Emissions requirements can limit the total number of hours for which a plant can burn ULSD during any 12-month period. Local zoning regulations can impact the size of on-site storage tanks and the frequency of truck deliveries to provide ULSD replenishment. In most cases the emissions controls on new plants as well as the sizing of on-site ULSD storage and unloading facilities along with careful consideration of resupply logistics and scheduling can adequately address these issues.”</u>