



Calpine Corporation

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June 30, 2022

Rules Coordinator
Office of General Counsel
Railroad Commission of Texas
1701 N. Congress
Austin, Texas 78701
Sent only via electronic mail to rulescoordinator@rrc.texas.gov

Re: Letter of Support – Proposed amendments to Chapter 5 to implement House Bill 1284 (87th Legislature, Regular Session, 2021)

Ladies and Gentlemen:

Calpine is pleased to support the Railroad Commission of Texas' (Commission) application to the U.S. Environmental Protection Agency (EPA) for primacy under EPA's Safe Drinking Water Act Underground Injection Control Class IV program.

Headquartered in Houston, with nearly one thousand Texas-based employees, Calpine provides safe, reliable, and environmentally responsible electricity to Lone Star State residents and businesses from approximately 9,000 megawatts of Texas-based, gas-fired generation. Furthermore, as part of its commitment to reducing its emissions, Calpine continues to actively explore opportunities for carbon capture and sequestration (CCS). For example, Calpine's Deer Park Energy Center in Southeast Texas has received a U.S. Department of Energy grant to conduct an engineering design study that would support the deployment of a commercial-scale carbon capture system. Designed to capture 95% of CO₂ emissions, the Deer Park Energy Center CCS project represents just one aspect of our ongoing carbon reduction efforts.

In addition to studying other CCS opportunities in Texas and across the country, Calpine has founded and actively participates in several trade and advocacy groups working to support CCS. One such organization, the Carbon Capture Coalition, fosters nonpartisan collaboration among more than 100 companies, unions, conservation and environmental policy organizations, all

working to build federal policy support for economywide, commercial scale deployment of carbon management technologies.¹ At the regional level, Calpine serves on the leadership team of the CCUS Commercial Deployment Consortium, established by the Southern States Energy Board and the University of Houston's Center for Carbon Management in Energy.² In Texas, we have joined with more than a dozen other major companies working together to advance plans for capturing and storing carbon dioxide from the Houston industrial area.³

As an advocate for CCS, Calpine supports efforts intended to accelerate the development of CCS projects in Texas. Considered to have one of the largest economies in the world,⁴ Texas is home to global energy leaders with expertise in engineering design and construction, energy technology, environmental policy, and academic research. With appropriate guidance from the Commission, this wealth of energy expertise will enable Texas to become a leader in building safe and durable CCS infrastructure. Accordingly, Calpine supports the Commission's primacy application and believes that such authority will help expedite the development of projects in Texas. The Commission has decades of experience with the state's robust energy infrastructure and unique geology. This specialized, local knowledge positions the Commission as the logical choice for the primary regulator overseeing large scale efforts in Texas to capture and then safely and permanently store anthropogenic carbon dioxide.

Sincerely,

DocuSigned by:

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Todd Thornton

Senior Vice President

CC: Leslie Savage

¹ <https://carboncapturecoalition.org/>

² <https://uh.edu/uh-energy/research/ccme/ccus-consortia.php>

³ <https://houstonccs.com/>

⁴ <https://businessintexas.com/news/texas-economic-dominance-continues-ranks-no-1-in-u-s-in-gdp-growth/>