

Office of Regulatory Management
Economic Review Form

Agency name	State Air Pollution Control Board
Virginia Administrative Code (VAC) Chapter citation(s)	9VAC5-530
VAC Chapter title(s)	Electric Generator Voluntary Demand Response General Permit
Date this document prepared	February 13, 2023
Regulatory Stage (including Issuance of Guidance Documents)	Periodic Review

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)
Omitted pursuant to ORM Regulatory Economic Analysis Manual

Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)
Omitted pursuant to ORM Regulatory Economic Analysis Manual

Table 1c: Costs and Benefits under Alternative Approach(es)
Omitted pursuant to ORM Regulatory Economic Analysis Manual

Impact on Local Partners

Table 2: Impact on Local Partners

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: Fiscal estimates are indeterminate. Indirect Costs: Fiscal estimates are indeterminate. Direct Benefits: The program may reduce demand during critical times, and possibly electricity consumption, thereby reducing electricity rates. Indirect Benefits: There will likely be indirect benefits realized through the control of air pollution. The purpose of a general permit is to provide expedited, simplified permitting as mandated by state law; this provides a measure of regulatory relief, and encourages the development of beneficial projects.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) Fiscal estimates are indeterminate.	(b) Fiscal estimates are indeterminate.
(3) Other Costs & Benefits (Non-Monetized)	<p>The primary advantage of the general permit is a streamlined process for permitting the minor source emissions units that participate in a voluntary demand response program. This will ensure that adequate electricity is available to commercial facilities and the citizens of Virginia during critical times when electrical demands may be significant. The general permit encourages a more efficient permitting process for the minor source emissions units that participate in a voluntary demand response program and a reduction in the number of permits that need to be modified or changed due to additions or changes at the facilities that are participating in a voluntary demand response program (i.e., load curtailment, demand response, peak shaving or like program).</p> <p>In addition, this general permit will expedite the installation and operation of distillate oil, natural gas, liquid propane gas, and bio-diesel fired electric generating facilities that participate in a voluntary demand response program (i.e., load curtailment, demand response, peak shaving or like program) and that qualify as non-major facilities under the federal Clean Air Act. The expedited process will also save considerable time and money for the source. The permit is designed to address both CI and SI engines and is also structured so that the source can select which method of compliance is most desirable; hours of operation or fuel throughput. Performance testing will verify the emissions thus ensuring the protection of public health.</p>	
(4) Assistance	None.	
(5) Information Sources	Air Pollution Control Law of Virginia, fiscal impact analysis for HB2531 (Chapter 752, 2009 Acts of Assembly)	

Impacts on Families

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Fiscal estimates are indeterminate.</p> <p>Indirect Costs: Fiscal estimates are indeterminate.</p> <p>Direct Benefits: The program may reduce demand during critical times, and possibly electricity consumption, thereby reducing electricity rates.</p>
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	<p>Indirect Benefits: There will likely be indirect benefits realized through the control of air pollution.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Fiscal estimates are indeterminate.	(b) Fiscal estimates are indeterminate.
(3) Other Costs & Benefits (Non-Monetized)	None.	
(4) Information Sources	Air Pollution Control Law of Virginia, fiscal impact analysis for HB2531 (Chapter 752, 2009 Acts of Assembly)	

Impacts on Small Businesses

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Fiscal estimates are indeterminate.</p> <p>Indirect Costs: Fiscal estimates are indeterminate.</p> <p>Direct Benefits: The program may reduce demand during critical times, and possibly electricity consumption, thereby reducing electricity rates.</p> <p>Indirect Benefits: The purpose of a general permit is to provide expedited, simplified permitting as mandated by state law; this provides a measure of regulatory relief, and encourages the development of beneficial projects.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Fiscal estimates are indeterminate.	(b) Fiscal estimates are indeterminate.
(3) Other Costs & Benefits (Non-Monetized)	<p>Small businesses will benefit from a streamlined process for permitting the minor source emissions units that participate in a voluntary demand response program. This will ensure that adequate electricity is available to commercial facilities and the citizens of Virginia during critical times when electrical demands may be significant. The general permit encourages a more efficient permitting process for the minor source emissions units that participate in a voluntary demand response program and a reduction in the number of permits that need to be modified or changed due to additions or changes at the facilities that are participating</p>	

	<p>in a voluntary demand response program (i.e., load curtailment, demand response, peak shaving or like program).</p> <p>This general permit will expedite the installation and operation of distillate oil, natural gas, liquid propane gas, and bio-diesel fired electric generating facilities that participate in a voluntary demand response program (i.e., load curtailment, demand response, peak shaving or like program) and that qualify as non-major facilities under the federal Clean Air Act. The expedited process will also save considerable time and money for the source. The permit is designed to address both CI and SI engines and is also structured so that the source can select which method of compliance is most desirable; hours of operation or fuel throughput.</p>
(4) Alternatives	None.
(5) Information Sources	Air Pollution Control Law of Virginia, fiscal impact analysis for HB2531 (Chapter 752, 2009 Acts of Assembly)

Changes to Number of Regulatory Requirements

None.