

FirstEnergy's Lake Shore coal plant: They wouldn't start up this relic again, would they?

Ohio Citizen Action, December 2011



In 1916, the company now called FirstEnergy built the Lake Shore coal plant in the middle of Cleveland. Of course, it had no modern technology, such as scrubbers, to limit sulfur dioxide, nitrogen oxide, or mercury pollution.

That was then, and of course nowadays, no such plant could be started up in the middle of a big city.

Really? Guess again: The Lake Shore plant is still in the middle of Cleveland. It still has no modern technology to limit sulfur dioxide, nitrogen oxide, or mercury pollution. And while the plant is now idled, FirstEnergy is continuing to fight a legal battle to be allowed to discharge even more mercury into Lake Erie, indicating it is considering starting the plant up again.

SUMMARY

- FirstEnergy's Lake Shore coal plant currently operates one unit built in 1962 that does not have modern pollution controls, such as scrubbers, to limit pollution emitted by the plant.
- The Lake Shore coal plant is currently idled for 18 months as of September 2011, but FirstEnergy's own statements indicate this is not a permanent decision and they want to keep the plant as an option for producing electricity.
- Pollution from the Lake Shore coal plant affects 886,780 people living within a ten mile radius of the plant. Closer to the facility, pollution from the plant has a disproportionate effect on poorer communities and communities of color.
- With the exception of 2009 when FirstEnergy operated Lake Shore 1/3 the number of hours than in prior years, pollution from the plant has steadily increased over the last decade while the number of operating hours has remained stable.
- Air pollution from the Lake Shore coal plant aggravates or leads to asthma, emphysema, bronchitis, and heart disease, among other negative health effects.
- FirstEnergy's operation of the Lake Shore coal plant shows a consistent 40-year pattern of violating pollution regulations and stonewalling and delaying any required actions. At the same time, regulatory enforcement has been weak.
- The Lake Shore coal plant has had over 1,400 malfunctions in the last twenty years and 350 malfunctions in the last three years.
- FirstEnergy has applied for modifications to its water permit which would allow the Lake Shore plant to quadruple its water pollution into Lake Erie.
- The Lake Shore plant no longer provides property tax or employment benefits to Greater Cleveland worth keeping it open.
- FirstEnergy's decision to idle the Lake Shore plant for 18 months and decisions they have made to sell excess generating capacity elsewhere, indicate the company does not need the electricity from Lake Shore to meet their customers' power needs.
- On several occasions over the last 16 months, FirstEnergy has hinted they are considering permanently shutting down the Lake Shore plant and their three other Lake Erie coal plants. However, the company's behavior also indicates they want to keep Lake Shore "in their back pocket" as a potential power source.

Lake Shore is an obsolete coal plant with outdated pollution controls

FirstEnergy's Lake Shore Plant, a 256 megawatt coal-fired power plant, sits on the shores of Lake Erie in the St. Clair Superior neighborhood, just four miles east of downtown Cleveland. Although the facility was constructed in 1916, FirstEnergy has only operated one unit (Unit 18), built in 1962, in recent years. **This unit does not have modern pollution controls, such as scrubbers, to limit sulfur dioxide, nitrogen oxide, mercury, or any of the other pollutants emitted by the plant.** The plant does have equipment known as an electrostatic precipitator for controlling soot, but is still a major polluter of soot.

Since 1993, FirstEnergy (formerly known as Centerior Energy until the company merged with Ohio Edison in 1997) has operated the Lake Shore plant on and off according to electric demand. The company mothballed the plant in 1993. A September 1997 letter from Centerior Energy to the City of Cleveland, in regard to visible emissions from Unit 18, said, "Since the mothballing of Lake Shore Boiler 18 in 1993, the boiler has had operating runs during the summers of 1994, 1996, and 1997. All of our efforts in 1996 were directed toward learning how to re-configure historic operating parameters to operate the boiler with Western coal." The boiler converted to Western coal by 1997 because Western coal has a lower sulfur content than Ohio coal and new federal laws required coal plants to use coal with less sulfur content. However, Centerior (and subsequently FirstEnergy) did not properly modify its pollution control equipment at Lake Shore to accommodate this change to Western coal. Although the coal itself used at Lake Shore had less sulfur content, pollution at the plant increased once this change was made.

In 2002, FirstEnergy attempted to sell the plant to NRG, but the deal fell through. At the time, the company told the City of Cleveland that it was looking for another buyer, but the plant was never sold. In 2009, FirstEnergy operated the plant for a total of 2,705 hours, citing lower demand for electricity. An August 12, 2010 press release from First Energy announced slow-downs in operations at Lake Shore due to lack of demand, saying it would only operate with 3-day notice through Aug 2011, and would be "temporarily idled" for 18 months after September 2011. As detailed later in this report, FirstEnergy's own statements since that time indicate this is not a binding decision, and they want to keep the Lake Shore plant as a viable option for producing electricity.

Pollution from Lake Shore affects a wide range of people

886,780 people live within 10 miles of the plant, the largest concentration of people within ten miles of any coal plant in Ohio. This ten mile radius includes disproportionately poor communities and communities of color, such as the St. Clair Superior, Glenville, Hough, Central, Fairfax, Kinsman, Mt. Pleasant, and Lee-Miles neighborhoods in Cleveland. It includes more developed Cleveland neighborhoods, such as Edgewater, Kamms Corners, Tremont, and University. The ten mile radius stretches into nearby suburbs with wide-ranging economic and racial makeup, such as some of Cleveland's poorest suburbs like E. Cleveland and Newburgh Heights; predominantly middle class suburbs, such as Brooklyn and Lakewood; and suburbs with mainly white populations with higher incomes, such as Bratenahl and Shaker Heights.

Within five miles of the Lake Shore plant, 198,418 are people of color (79%) and 186,255 (74%) are African-American. 79,366 people are poor (33%) and 73,566 people (29%) are under the age of 18.

Within three miles of Lake Shore, 90,836 are people of color (90%) and 86,326 people (85%) are African-American. 36,582 people are poor (38%) and 29,829 (31%) are under the age of 18.

In its July 2011 report, “Coal Blooded: Putting Profits Before People in Ohio,” the NAACP examined 431 coal-fired power plants nationwide and assigned a letter grade and ranking to each of the plants based upon its effects on low income communities and communities of color. The study analyzed emissions from each of the plants and demographic factors, such as income, total population, and the percentage of people of color living within three miles of the plants. FirstEnergy’s Lake Shore coal plant received an ‘F’ from the NAACP and was ranked the 6th worst coal plant in the country and the worst in Ohio. The study also points out that the St. Clair Superior neighborhood where Lake Shore is located has the highest childhood lead poisoning rates in Ohio and that more people in northeast Ohio die from coal plant pollution than anywhere else in the United States, according to the September 2010 Clean Air Task Force study “The Toll from Coal” [<http://www.catf.us/resources/publications/view/138>].

Nearby public places include:

- Within one mile of Lake Shore plant

---East 55th Street Marina: Popular marina with a protected harbor and a picnic pavilion

---Horizon Science Academy: Premier public charter school

- Within three miles of Lake Shore plant

--- Gordon Park: Picnic area and onshore fishing platforms

---Cleveland Lakefront Nature Preserve (Dike 14): Cleveland’s only nature preserve, home to native Ohio plants, trees, animals, and birds

- Within five miles of Lake Shore plant

---Cleveland Art Museum

---Cleveland Botanical Garden

---Great Lakes Science Center

---Rock and Roll Hall of Fame and Museum

---Cleveland Browns Stadium

- Within ten miles of Lake Shore plant

---Euclid Creek Reservation: Popular fishing, swimming, hiking area, part of Cleveland Metroparks system

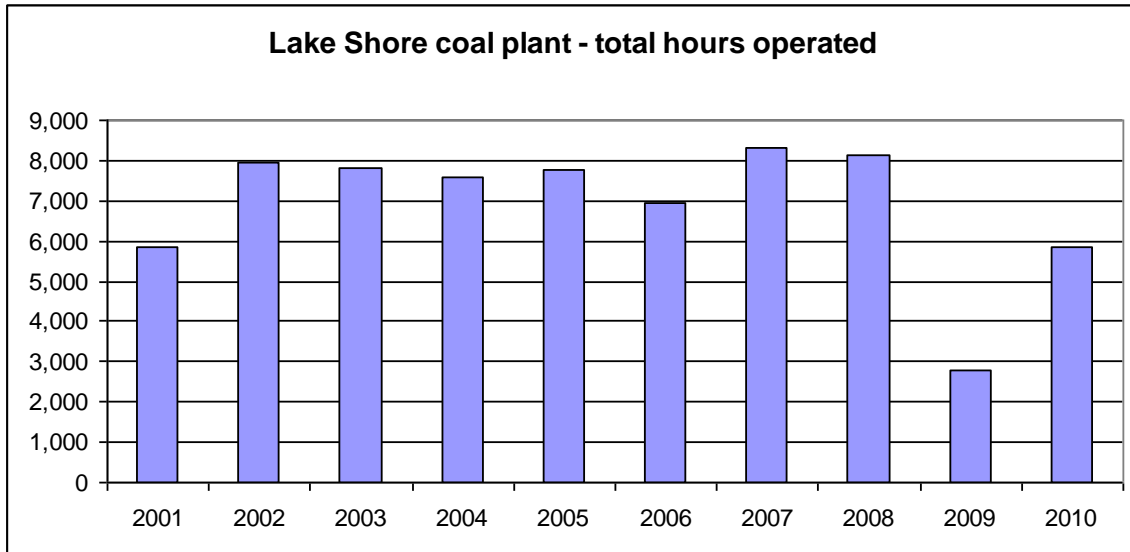
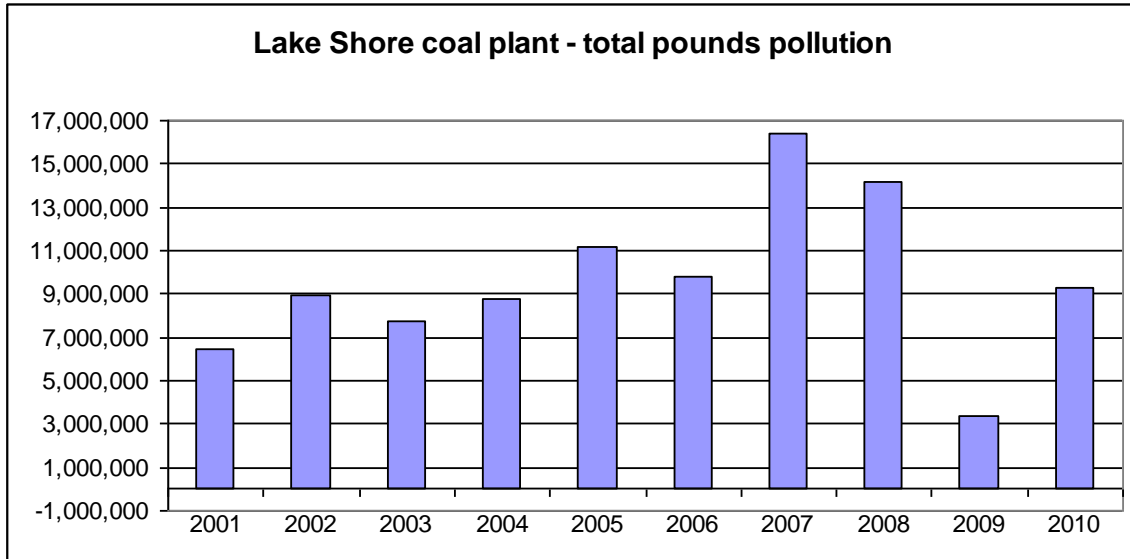
---Lakefront State Park: Fishing, boating, running, biking, and picnicking area

---Cleveland Metroparks Zoo

Although smaller in size, Lake Shore coal plant emits huge amounts of pollution

With the exception of 2009, when FirstEnergy operated the Lake Shore plant at around 1/3 the amount of hours than in prior years, overall pollution emissions have steadily increased in the past decade although the number of hours the plant operated remained relatively stable at about 90% of the total

hours in a year (8,760 hours). This means pollution control equipment either is not operating properly at all times or the Lake Shore facility lacks the proper pollution control equipment to handle all the poisons resulting from processing coal into electricity.



Lake Shore air pollution among worst in Greater Cleveland, causes terrible health effects

In 2008, the Lake Shore plant was the second largest source of air pollution in the Greater Cleveland area, according to Environmental Health Watch. Air pollution from the Lake Shore plant can aggravate or lead to asthma, emphysema, bronchitis, and heart disease, among other negative health effects. FirstEnergy reported the following emissions for 2010, the most recent year for which numbers are available:

Total Pollution: **9,103,260 pounds**

Sulfur Dioxide	6,135,400 pounds
Nitrogen Oxide	2,158,600 pounds
Carbon Monoxide	245,400 pounds
Lead	60 pounds
Mercury	40 pounds
Soot	442,400 pounds

In addition, the Lake Shore plant releases 121,360 pounds of pollution that consists of: organic compounds (including volatile organic compounds), ammonia, arsenic, beryllium, cadmium, chromium, manganese, nickel, polycyclic organic matter, selenium, barium compounds, and sulfuric, hydrochloric and hydrofluoric acids.

What pollution from the Lake Shore coal plant is doing to our bodies

Sulfur Dioxide---6,135,400 pounds

Sulfur dioxide can cause shortness of breath and wheezing, and aggravate asthma, emphysema, bronchitis and heart disease. High concentrations of sulfur dioxide can kill you.

Nitrogen Oxide---2,158,600 pounds

Nitrogen oxide can cause respiratory illness and infection; aggravate asthma, emphysema, bronchitis and heart disease; and cause permanent damage to the lungs.

Carbon Monoxide---245,400 pounds

Carbon monoxide can cause headaches, dizziness, fatigue, nausea, impaired vision and reduced brain function. High concentrations of carbon monoxide can kill you.

Lead---60 pounds

Lead interferes with the development of the brain and central nervous systems and can severely damage the kidneys, cardiovascular system, and immune system. Children under the age of six and unborn babies are particularly susceptible to lead, which can cause learning disabilities, mental retardation, severe blood and brain disorders, behavioral problems, and slow or stunted growth.

Soot---442,400 pounds

Soot causes difficulty in breathing, aggravates asthma and bronchitis, and can lead to irregular heartbeat, heart attacks, and asthma attacks. Small children are especially vulnerable to soot because their lungs and circulatory systems are still developing.

Mercury---40 pounds

Mercury can permanently damage the brain and nervous system, cause severe kidney and gastrointestinal damage, and cause allergic reactions, especially when absorbed through the skin. Mercury is particularly damaging to fetuses, infants, and small children, causing negative effects on memory, attention, cognitive and learning skills and motor functions. Small levels of mercury in the

womb can cause severe neurological damage and death.

Organic and Volatile Organic Compounds (VOCs)---29,600 pounds

Organic and volatile organic compounds (organic compounds which become gases) irritate the eyes, nose, and throat; can cause headaches, loss of coordination, nausea, dizziness, fatigue and allergic skin reactions; and damage to the liver, kidneys, and central nervous system. Some organic and volatile organic compounds can cause cancer.

Ammonia---200 pounds

Ammonia can cause coughing, wheezing, shortness of breath, headaches, fever, nausea, and chest pain. Ammonia can also cause burning in the eyes, nose, and throat and respiratory failure. High concentrations of ammonia can cause blindness, seizures, coma, and death.

Hydrochloric Acid (Hydrogen Chloride)---49,800 pounds

Hydrochloric acid can cause coughing, choking, nausea, vomiting, diarrhea, and can burn the eyes, mouth, throat, skin and esophagus. Higher concentrations of hydrochloric acid can result in blindness and death.

Hydrofluoric Acid (Hydrogen Fluoride) ---20,800 pounds

Hydrofluoric acid can cause severe eye, nose, and throat irritation; can cause rashes, skin burns, severe scarring, and lung disease; and high concentrations of hydrofluoric acid can result in blindness and death.

Lake Shore coal plant has a history of violating air pollution regulations

FirstEnergy's operation of the Lake Shore plant shows a consistent 40-year pattern of violating pollution regulations and stonewalling and delaying any required actions. Regulatory enforcement has also been weak.

In 1971, the City of Cleveland took legal action against the plant for visible soot pollution from four of their five coal boilers. After appealing the order, Cleveland Electric Illuminating (CEI), the forerunner of FirstEnergy, eventually announced it would switch these boilers from coal to fuel oil in 1973. This conversion was delayed by the world oil embargo in 1973, but CEI ultimately agreed to make the conversion by 1977 (these four boilers eventually closed.)

In 1976 and again in 1977, the U.S. EPA notified CEI that Unit 18, the large coal-fired burner at the Lake Shore plant, was violating Ohio's soot pollution rules. The violations continued and U.S. EPA sued CEI for soot pollution violations at Lake Shore, and three other coal plants, in 1981. U.S. EPA settled with the company in a consent decree issued in 1983. As part of the consent decree, CEI agreed to various operating parameters for the four plants and to pay a \$175,000 civil penalty. It agreed not to run Unit 18 at more than 260MW and to operate in continuous compliance, to comply with certain testing

requirements, and to report on malfunctions.

In November 1999, the U.S. EPA used its authority under the Clean Air Act to write a letter to FirstEnergy that, by law, would require the company to produce information about the operations at its facility. Six months later, on June 14, 2000, the U.S. EPA issued a violation against FirstEnergy for failing to respond to the request.

The USEPA sent FirstEnergy another Clean Air Act letter in May 2008 – nine years after the original letter – along with an administrative violation citing the company’s failure to reply to the 1999 letter.

FirstEnergy’s 2010 10-K report acknowledges the U.S. EPA notice of violations for their four Lake Erie plants, including Lake Shore coal plant. However, FirstEnergy says they do not agree with the U.S. EPA’s assessment that changes made, some dating back to 1990, would have triggered updates to their pollution controls. FirstEnergy says it “intend(s) to comply” with the Clean Air Act and U.S. EPA’s requests but “at this time is unable to predict the outcome of this matter.” (source: FirstEnergy 2010 10-K report, page 16.)

In late 2009, the City of Cleveland issued a notice of violation against the Lake Shore plant for problems with its sulfur dioxide monitor. FirstEnergy ended up buying and installing a new monitor in February 2010.

Lake Shore has over 1,400 malfunctions in twenty years, 350 malfunctions last three years

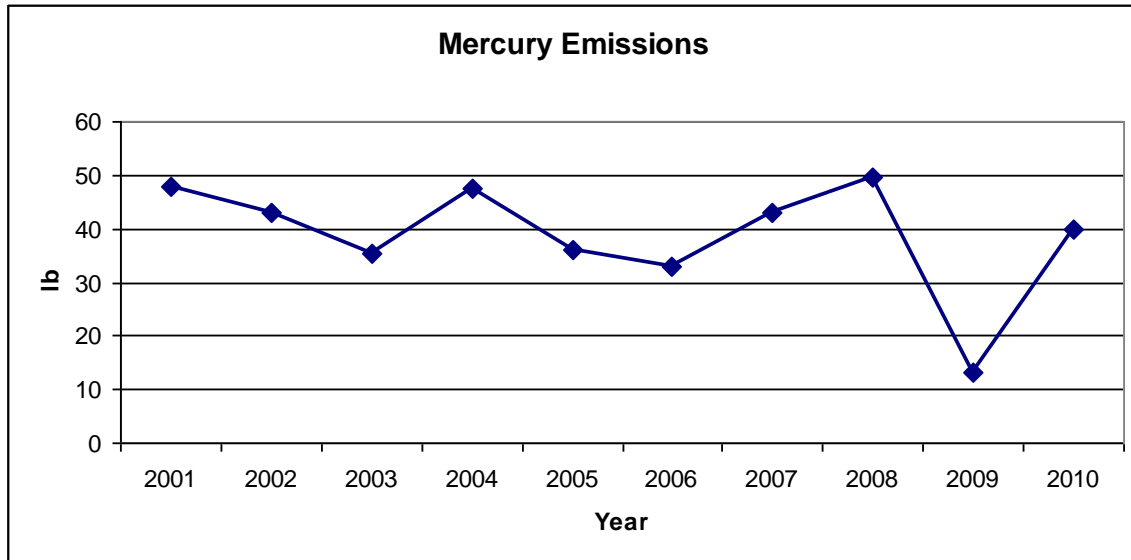
The Cleveland Division of Air Quality provided Ohio Citizen Action with a database of malfunction reports for the Lake Shore facility from 1990-2010, with over 1,400 reported malfunctions. Malfunctions include visible air pollution violations, air control problems, blowing soot, coal feeder problems and precipitator malfunctions, among others. There were 350 reported malfunctions from 2008 through August 2010 alone.

The City of Cleveland’s files also contain more detailed reports of major malfunctions and visible pollution from the facility, some caused by equipment problems. Ohio Citizen Action has begun an analysis of the Lake Shore coal plant malfunctions database that will include additional malfunctions that have occurred from August, 2010 to the present. This information will be released to the public when the full analysis is complete.

Despite ‘significant’ and ‘high priority’ water pollution problems, FirstEnergy seeks to quadruple water pollution into Lake Erie

The Federal EPA’s “Clean Water Act Watch List,” released in November 2011, identified FirstEnergy’s Lake Shore and Ashtabula coal plants as “facilities with alleged violations identified as either significant or high priority.” Both air and hazardous waste pollution from the Lake Shore plant discharge directly into Lake Erie.

FirstEnergy reports emitting mercury directly into Lake Erie from the coal ash that is produced during the plant's operation. Mercury accumulates in fish and harms people who eat the fish.



In August 2008, FirstEnergy applied for modifications of its permit, seeking permission to quadruple the amount of mercury it can dump into the lake. FirstEnergy said it was too costly to meet the lower limit. Several environmental organizations and the Village of Bratenahl opposed the variance during a public hearing and comment period in early 2010. Ohio EPA issued the variance on September 14, 2010, and NRDC and Sierra Club appealed it. A hearing at the state Environmental Review Appeals Commission is not scheduled until November 2012.

In the meanwhile, FirstEnergy applied for a renewal of its full water discharge permit in June 2011, as required by Ohio EPA every five years. NRDC and Sierra Club again filed objections to the permit, citing the mercury issues and several additional objections to the permit, including questioning whether the plant is meeting "best available technology" standards for water intake and discharge of heated water back into the lake. The plant's intake system kills an estimated 15,490,000 fish per year, as well as an estimated 900,000 juvenile fish, larvae, and eggs per year.

Ohio EPA granted the renewal permit to FirstEnergy, and the appeal of that permit was incorporated into the appeal scheduled for November 2012.

Lake Shore plant no longer provides property taxes or employment worth keeping it open

Two arguments for maintaining operations at a power plant are that it can provide economic benefits through taxes and employment to the municipality in which it operates. Like many other industries in Cleveland, Lake Shore is not contributing in these two ways the way it did fifty years ago when the plant began operating.

1. Property taxes

FirstEnergy has published various statements over the past years describing the amount of money it pays in property taxes for the Lake Shore facility. A July 8, 1999 letter to the City of Cleveland claimed that the plant “pays over \$3.2 million in property taxes each year.” A 2007 FirstEnergy Fact Sheet says the company paid over “\$1.1 million for property taxes” in 2007.

However, a review of the records of the Cuyahoga County auditor shows that the actual property taxes on the site total much less than \$1 million.

FirstEnergy has actually paid approximately \$326,000 in property taxes per year for this site since 2005, and payments in prior years were in this range or lower. In 2003, the County Auditor billed FirstEnergy for \$2 million in back taxes, penalties, and interest dating back to 1995, because FirstEnergy had not been paying their tax bill. This bill was paid by 2004.

The land and buildings on the site are listed as having a market value of a total of approximately \$11 million and an assessed value of approximately \$4 million since 2002 (the last year listed in the electronic records database).

2. Employment

In its heyday fifty years ago, when the plant was operating two large coal-fired boilers, it reported having 224 employees.

However, as one of the boilers has permanently closed and the other has been operated on and off, employment has decreased significantly. The 1999 letter cited above says “the plant currently employs 12 people.” A 2007 Fact Sheet published by FirstEnergy says that the plant employs 65 people. In 2009, FirstEnergy announced that it was putting the plant on stand-by status and that it could be operated with three days notice. Operating a plant at this status presumably required just a skeleton crew of employees. In August 2010 FirstEnergy announced that it would temporarily idle Lake Shore beginning in September 2011 and would work to reassign any employees who were working at Lake Shore to different parts of its company.

Do we need electricity from FirstEnergy’s Lake Shore power plant to keep our lights on?

FirstEnergy apparently doesn’t think so, since it is now idling the plant for eighteen months. And if FirstEnergy executives thought that Lake Shore’s 256 megawatts of generating capacity was vital, why would they have just sold off 707 megawatts of capacity at the Fremont Energy Center, and another 450 MW of capacity at its Richland/Stryker units in Defiance and Williams counties?

The 256 megawatts at stake at Lake Shore are dwarfed by the size of the national transition from coal to cleaner fuels. According to the non-partisan Congressional Research Service [<http://www.lawandenvironment.com/uploads/file/CRS-EPA.pdf>], “In 2010, 48 [older, smaller, less efficient coal-fired units] with a combined capacity of 12 gigawatts [12,000 megawatts] were retired, according to one source. Another source identifies 149 coal-fired units with a combined capacity of 19.7 gigawatts [19,700 megawatts] whose retirement has been announced or implemented in the past few years.” This transition continues smoothly because the market has plenty of electricity to sell to companies closing coal plants.

This supply will be available even if coal plant closings escalate with stronger federal coal regulations. “Summer reserve margins are currently 26% across the U.S. and are likely to decline only to 24% by 2014 in a draconian scenario in which 45 gigawatts of [coal-fired] generation is retired” (FBR Capital Markets, *Coal Retirements in Perspective – Quantifying the EPA Rules*, December 13, 2010, p. 18). The North American Electric Reliability Corporation is charged with maintaining the reliability of the continent’s bulk power system. The organization considers 15% to be the necessary planning reserve margin [<http://www.nerc.com/page.php?cid=4%7C331%7C373>].

First Energy’s Stated Intentions Regarding Lake Shore

In an August 12, 2010 press release, FirstEnergy announced its intended plans “to make operational changes at certain of its smaller coal-fired units in response to the continued slow economy and lower demand for electricity, as well as uncertainty related to proposed new federal environmental regulations.” [<http://investors.firstenergycorp.com/phoenix.zhtml?c=102230&p=irol-newsArticle&ID=1459646&highlight=>]

“The changes - which affect Bay Shore units 2-4 in Oregon, Ohio; Eastlake Plant units 1-4 in Eastlake, Ohio; the Lake Shore Plant in Cleveland, Ohio; and the Ashtabula Plant in Ashtabula, Ohio - are designed to reduce operating costs and provide more predictability while maintaining availability for future operations, as needed. Efforts will be made to reassign affected employees to other FirstEnergy facilities.

“While we’ve seen signs of economic recovery in the first half of this year compared with 2009, customer demand is still well below 2008 levels,” said Gary R. Leidich, executive vice president of FirstEnergy and president of FirstEnergy Generation Corp. “As a result, our smaller, load-following plants have been called upon to operate less frequently. By reducing operations at these facilities, we will better match our generation with our expected customer loads and position our company to comply with ever increasing environmental regulations...

“Beginning September 2011, for approximately 18 months, the Bay Shore and Eastlake units will be available only in the winter and summer months, and the Ashtabula and Lake Shore plants will be temporarily idled.”

On February 25, 2011, FirstEnergy completed its merger with southwestern Pennsylvania utility Allegheny Energy. “The merger of FirstEnergy and Allegheny Energy was completed in February 2011, creating the nation’s largest investor-owned electric system based on the number of customers served,” according to a statement released on FirstEnergy’s website last modified February 26, 2011. [https://www.firstenergycorp.com/about/company_history.html]

The FirstEnergy/Allegheny merger, which includes control of Allegheny’s electric generating plants, prompted FirstEnergy spokesperson Ellen Raines to make the following statement in a February 27th 2011 *Plain Dealer* story: “When you operate a larger number of power plants as a single fleet, you rely more on the power plants with environmental control and on plants that run more efficiently.”

These statements might lead one to believe FirstEnergy will eventually make the decision to permanently close its Lake Shore power plant. However, in a March 21, 2011 letter to Ohio Citizen

Action's Cleveland Campaign Director Stephen Gabor, FirstEnergy President and Chief Executive Officer Anthony Alexander said the following:

"Although they operate on a very limited basis, the Ashtabula, Bay Shore, Eastlake and Lake Shore plants remain valuable components of our generation strategy, supporting the reliability of our regional electric system when customer demand for electricity is high.

As you know, multiple regulations have been proposed and are at various stages of the regulatory process at the US EPA. With this in mind, it's premature to determine how they would impact the operation of these plants."

FirstEnergy's shareholders understand the financial risks associated with continuing to operate outdated coal plants like Lake Shore. Many shareholders made their feelings known at the company's annual shareholders' meeting on May 17, 2011. FirstEnergy shareholder As You Sow, an environmental group promoting corporate responsibility through shareholder actions, proposed a resolution requesting that FirstEnergy issue a report on the future financial risks of burning coal. [See item 9, p. 25 at <https://www.firstenergycorp.com/content/dam/investor/files/proxy-materials/2011/2011%20Notice%20of%20Annual%20Meeting%20and%20Proxy%20Statement.pdf>] 31% of shareholders voted in favor of the resolution.

At the same meeting, Green Century Capital Management, a mutual fund administrator that specializes in environmentally responsible funds, and the Camilla Madden Charitable Trust proposed a resolution requesting that FirstEnergy prepare a public report detailing how it plans to meet upcoming federal regulations with stricter guidelines on how utilities store coal ash. [See item 6, p. 19 at <https://www.firstenergycorp.com/content/dam/investor/files/proxy-materials/2011/2011%20Notice%20of%20Annual%20Meeting%20and%20Proxy%20Statement.pdf>] 36% of shareholders voted in favor of this resolution.

Although neither shareholder resolution passed, As You Sow's Larry Fahn explained the significance of the results when interviewed by the *Plain Dealer's* John Funk after the voting took place. "Even five years ago, the support was in the 6 percent to 12 percent ranges. These vote results. . . represent millions of shares," he said. [http://www.cleveland.com/business/index.ssf/2011/05/firstenergy_corp_shareholders.html]

Recent statements give one indication how new federal regulations might affect FirstEnergy's decisions about the future of Lake Shore and their other three Lake Erie coal plants. In their "Third Quarter 2011 Consolidated Report to the Financial Community, dated November 29, 2011, on page 11, titled "Environmental Update: Compliance Strategy," FirstEnergy states meeting potential new environmental standards for coal plants they describe as "un-scrubbed subcritical units at risk" could cost the company \$2-\$3 billion in upgrades. As part of their "compliance strategy," FirstEnergy notes in the report that 1700 megawatts of "Lake Plants" are subject to potential retirement. [<http://investors.firstenergycorp.com/phoenix.zhtml?c=102230&p=irol-IRHome>]

On page 45 of the same presentation, "Asset Portfolio," FirstEnergy lists total capacity for its four Lake Erie coal plants Bay Shore Units 1-4, Eastlake Units 1-4, Ashtabula, and Lake Shore as 1,756 megawatts.