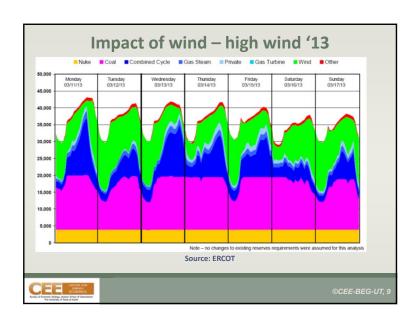
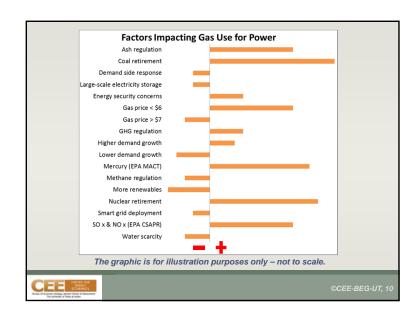


More Risk for Coal Pending EPA regulations on CO₂, SO₂/NO_X, mercury, ash 6 GW to 65 GW of coal capacity may retire 2011-15* Planned coal capacity declined from ~18 GW for 2010-14 to ~10 GW for 2011-15 (EIA data) *World Resources Institute, review of various studies.

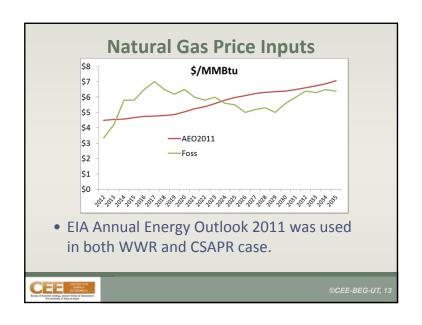


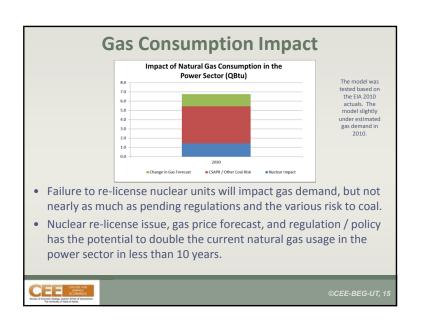






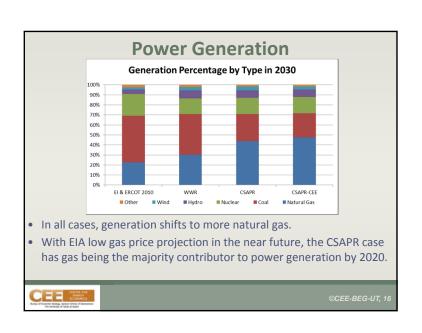
Six Different Runs w/ AURORAxmp 1. The "baseline" – World without Modeled only the regulation (WWR) Eastern Interconnect & ERCOT 2. The WWR case with nuclear units failing to renew upon their license. • All runs used the latest new build cost 3. CSAPR case estimates from EIA a. CSAPR for NO_X and SO₂ • All reviewed against b. MACT, HAPS for mercury & others **WWR** c. CO₂ (\$14/t in 2018 to \$40/t in 2030) d. Renewable incentive of \$15/MWh No emission regulation nor subsidies for 4. Natural gas price spike (CSAPR-CEE) renewables 5. CSAPR-CEE No CO2 case CREZ in ERCOT

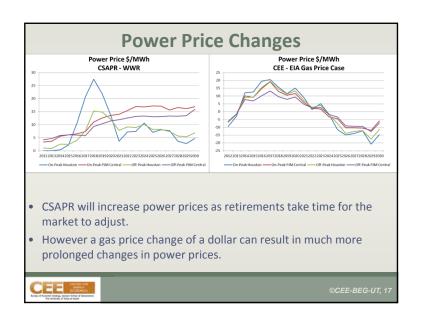


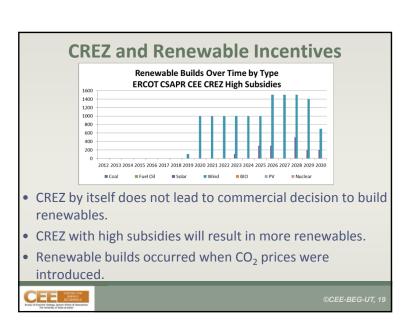


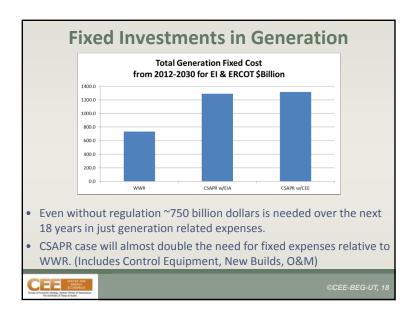
Conclusions Significant potential for gas consumption in the power sector. Gas generation could be the dominant generation source for the United States by 2020. Biggest driver in power prices is natural gas prices. Significant investment is needed in generation. These decision will be made with future risk of CO₂ price whether it transpires or not. CREZ by itself will not stimulate new renewable builds. Subsidies will still be required.

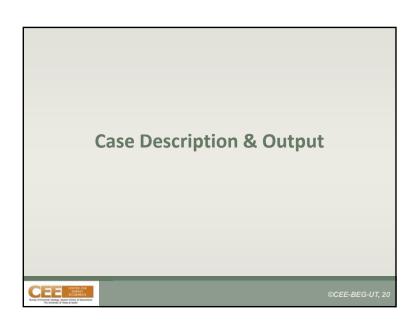
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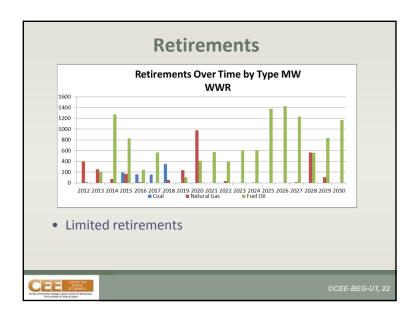
World Without Regulation (WWR)

- Unreal, but easily understood case.
- No regulations or policy.
- No renewable subsidies.
- EIA AEO 2011 Gas Price Forecast.



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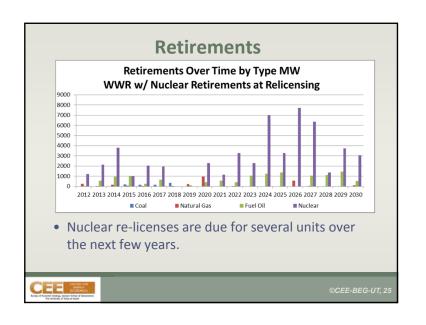


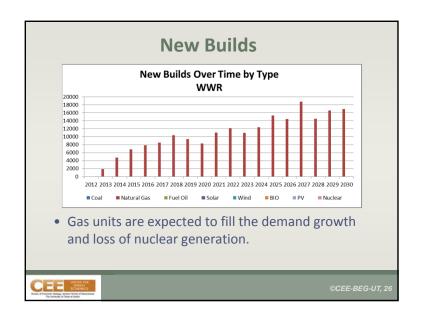
World Without Regulation (WWR) without Nuclear Relicense

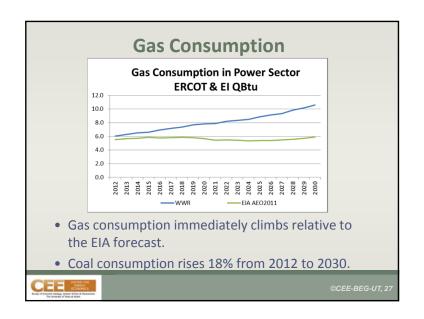
• WWR case except nuclear units were not allowed to renew their license



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Cross State Air Pollution Rule (CSAPR) • EIA AEO 2011 Gas Price Forecast • Renewable subsidy of \$15/MWh – proxy for REC and/or PTC • EPA latest ruling on CSAPR applied • Required multiple iterative runs to converge on emission price and emission limits

Emission Regulations

- CSAPR has 2 groups of states.
- Trading within groups allowed in 2012 & 2013.
- Banking is allowed.
- MACT and HAPS will likely require all coal plants to install control equipment by 2018.
- \$600/kW is the capital cost of control equipment (10-year recovery period).
- Coal units older than 55 were not given the choice to install scrubber. They were automatically retired around the 2018 period.
- Calibrated price of NO_X and SO₂ in each state to comply with CSAPR limits in 2012 & 2014.



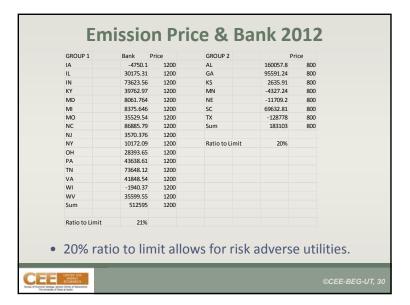
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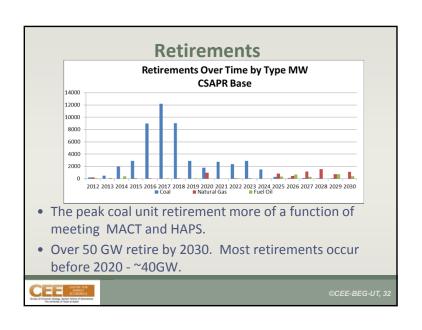
SO₂ Emission Price & Bank 2014

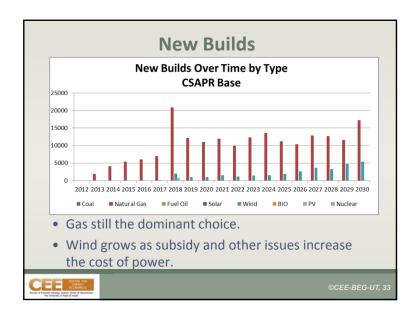
- By 2014 limited trading to 18% of state allowance occur.
- This necessitate individual states achieve close to their targets.
- Multiple iterations occurred leading to some states to just achieve a 0% bank prices over \$3,000/ton of SO₂.
- Similar process was done for NO_x.

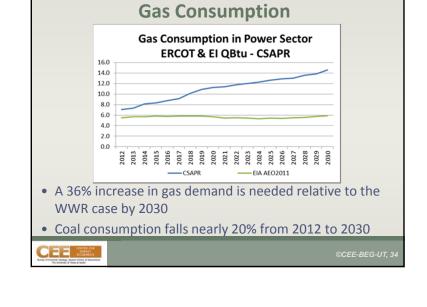


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Cross State Air Pollution Rule (CSAPR) with CEE Gas Forecast

- Gas price forecast altered with mid-term gas prices higher, but longer term lower relative to the EIA AEO 2011.
- Resulted in needing to raise the emission prices as high prices increase the threshold for coal plants to dispatch more.

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Emission Impact

- With higher gas price increase in emission price needed.
- Over \$1000/ton increase in price still did not achieve the same level of banks as in the CSAPR case.



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