

### EPA's Clean Power Plan: Arizona's Rate-Based Goal

Steve Burr AQD, Legal Support Section September 3, 2014



### Overview



- Rate Calculation Basics
- Baseline Rate
- Effect of Building Block 2
- Impact of Interim Goal

#### Rate Calculation Basics



• Rate = Weighted Average lbs CO<sub>2</sub>/MWh for all covered EGUs:

$$\frac{\sum (Gen \times Rate)}{\sum Gen}$$

For each type of generation

- Coal, NGCC, Oil and Gas Steam (OG)
- Exception: "Other" emissions added directly

### **Rate Calculation Basics**



# Categories of covered EGUs:

	Type of EGU							
	Steam Gen	erating Unit	Natural G					
Output	Coal	Oil and Gas Steam	Combined Cycle	Simple Cycle (High Capacity)	IGCC			
Electricity	HRI + Redispatch From	Redispatch From	Redispatch To	Other				
Useful Thermal Output			Other					

### Rate Calculation Basics



- 3 ways to reduce rate:
  - Subtract generation from numerator
  - Shift from generation with high rate to generation with low rate
  - Add generation to denominator

### **Baseline Rate**



- Baseline Year = 2012
- Arizona's Baseline Data

Generation Type	Generation (MWh)	Rate (lbs CO <sub>2</sub> /MWh)
Coal	24,335,930	2,268
NGCC	26,782,325	900
OG	1,033,871	1,563

- "Other"
  - 19,361 MWh
  - 17,227,768 lbs CO<sub>2</sub>
- Renewable Energy (RE): 1,697,652 MWh
- 6% Nuclear ("at risk"): 1,818,486 MWh

### Baseline Rate



For covered EGUs only:

For covered EGUs, RE and At-Risk Nuclear:

Final goal for 2030:

702 lbs CO<sub>2</sub>/MWh

# Effect of Building Block 2



- Shift from Coal, OG to NGCC
  - EPA: NGCC capable of operating at 70% capacity
  - 70 % Actual *annual* capacity factor (CF) = unused capacity
  - Goal reflects shift or "redispatch" from Coal and OG to NGCC to extent of unused capacity

## Effect of Building Block 2



### Arizona

- 2012 annual NGCC capacity factor = 27%
- If increase to 70%, more than sufficient to displace all Coal and OG generation
- Rate based goal incorporates this assumption:
  1453 lbs CO₂/MWh → 900 lbs CO₂/MWh
- 74% of reduction required
- Problems (e.g.)
  - Peak usage
  - Un-recouped investment

### Interim Goal



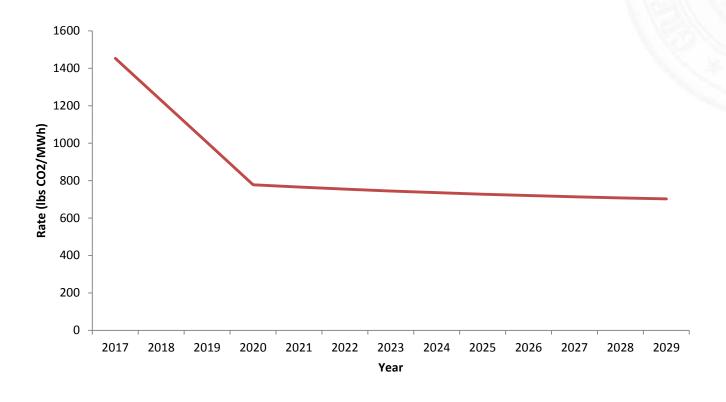
- Average of rate-based goals for 2020-2029
- In calculating, EPA assumed building blocks 1 and 2 could be implemented by 2020
- Effect: interim goal = 735 lbs CO<sub>2</sub>/MWh:

Year	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Rate	778	765	754	744	735	727	720	713	707	702

Reductions from 2020-2029 = RE and EE



# Rate reduction curve:



#### Interim Goal



# • Alternative approach to Building Blocks:

	Step 3a & 3b (Redispatch)			Step 6&7 (State Goal Phase I & II (lbs/MWh))		
Scenario	Redispatche d Coal Gen. (MWh)	Redispatch O/G steam Gen. (MWh)	Redispatche d NGCC Gen. (MWh)	Interim Goal or Rate (2020 - 2029 average)	Final Goal or Rate (2030 and thereafter)	
1. EPA Goal Calculation	0	0	52,152,127	735	702	
2. 15 % RE and 1.61 % Incremental EE Savings	6,532,309	277,514	45,342,304	774	702	
3. 21 % RE and 1.61 % Incremental EE Savings	9,707,768	412,418	42,031,940	803	702	
4. 33 % RE and 2.00 % Incremental EE Savings	17,289,395	734,511	34,128,220	858	702	
5. 33 % RE and 2.00 % Incremental EE Savings	9,476,915	402,611	42,272,601	735	601	

 Scenarios presented for illustration only. ADEQ has not evaluated the technical or economic feasibility of any of the RE or EE alternatives included.