



Renewable Energy Markets and the Clean Power Plan (Part I)

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The Influence of Clean Power Plan Compliance Pathway Choice on Renewable Energy Construction

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Synapse Energy Economics

- Founded in 1996 by CEO Bruce Biewald
- Leader for public interest and government clients in providing rigorous analysis of the electric power sector
- Staff of 30 includes experts in energy and environmental economics and environmental compliance

The Clean Power Plan (abridged)

Clean Power Plan and Section 111(d)

Who? Applies to existing fossil fuel-fired generators that were in operation

or under construction by January 8, 2014 and that meet certain size

and production requirements

What? Covered units must reduce emissions of carbon dioxide (CO₂) by the

amount determined by EPA to reflect the Best System of Emission

Reductions (BSER) for the source category

When? Compliance targets must be met on average over an 8-year interim

compliance period as well as in the final compliance year: 2030

Where? Applies to units in 47 states and several Tribal lands (Vermont and

Washington D.C. have no covered units; Hawaii, Alaska, Puerto Rico,

and Guam will be brought into the program when more data is

available on the units in those states/territories)

To reduce emissions of CO₂ from the electricity sector in order to Why?

reduce the contribution to global climate change

Timeline for Compliance

- First date for compliance pushed back from 2020 to 2022
- Two additional years to complete final State Plans
- States still expected to demonstrate progress during an interim period through 2029 and must meet the final compliance targets by 2030



CPP Compliance Options (abridged)

Two Forms of Compliance

Rate- Compliance is determined on a pounds based per megawatt hour basis at the unit

level or on a state-wide weighted

average basis

Mass- Compliance is determined on a total based tons of CO2 emitted basis (*EPA has done*

the translation from rate to mass for

each state)

Two Types of Compliance Plan Approaches

Emission standards plan

Includes source-specific requirements on all units covered by the Clean Power Plan in order to meet the required emissions performance rates or the state-specific rate-based or mass-based goals

State measures plan

Includes a mixture of measures implemented by the state, such as EERS or RPS programs, that are not included in the federally enforceable components of the plan. Must include a backstop of federally enforceable emission standards on all units covered by the Clean Power Plan in case the state measures fail to achieve the required reductions. Available only to states who choose a mass-based compliance pathway.

Potential Compliance Pathways

Rate-based Compliance (lbs/MWh)

Subcategorized CO₂ Emission Performance Rates

Specific nationwide emission performance rates for coal units and NGCC units

Mass-based Compliance (tons CO₂)

M1

CO₂ Mass Goal for Existing Units

A statewide portfolio of strategies is used to meet the EPA goal for emissions from existing units

R2

R1

Model Rules

State CO₂ Emission Performance Rates

Each generator must meet the single state average (derived using the nationwide emission performance rates and the mix of fossil resources in a given state)

R3 Unique CO₂ Emission Performance Rates

The state allows some flexibility in individual generator's emission rates, as long as the total rate matches the one created by EPA

M2

CO₂ Mass Goal for Existing Units with New Unit Complement

A statewide portfolio of strategies is used to meet the EPA goal for emissions from existing and new units

M3

State Measures: CO₂ Mass Goal for Existing Units

A statewide emission cap is applied to existing fossil units. States must demonstrate that there is no "leakage" of generation to new fossil units

M4

State Measures: CO₂ Mass Goal for Existing and New Units

A statewide emission cap is applied to all fossil units, existing or new.

Emission Trading for Compliance

- Emissions trading is a long-established mechanism for complying with environmental regulations
 - Acid Rain program, Regional Haze, NOx Budget Trading program, CSAPR, CAIR, RGGI in the Northeast, AB 32 in California
- EPA provides a "panoply" of tools to facilitate the use of emissions trading programs in the Clean Power Plan
- Both of EPA's proposed model rules (rate and mass) include emission budget trading programs
- Trading options limited by compliance pathway

Allowance Trading

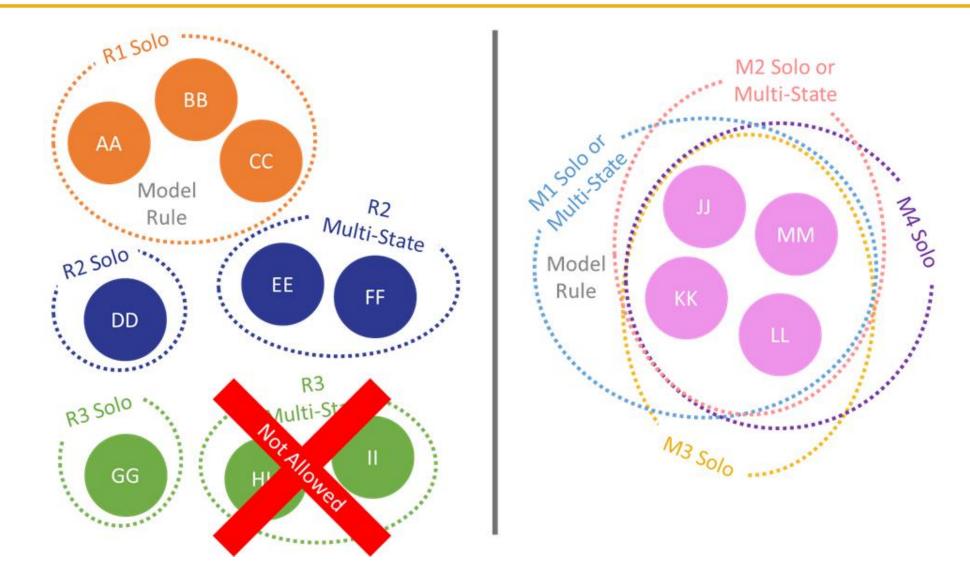
Ratebased

- Emission Rate Credits (ERCs) represent one MWh of zero-emission generation
- ERCs can be produced by EE, RE, new nuclear, or performance uprates at existing nuclear, hydro, and NGCC power plants
- ERCs added to denominator of the lbs/MWh calculation

Massbased

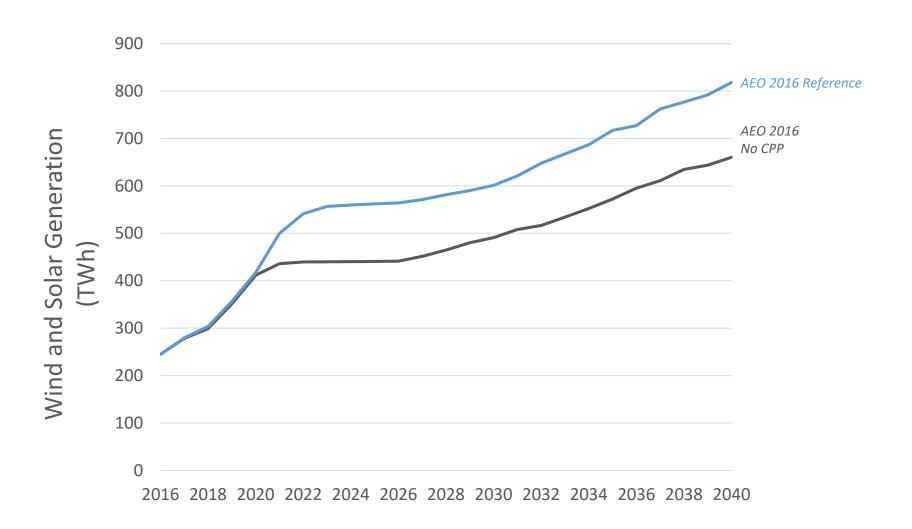
States issued allowances which can be auctioned or given away

Who Can Trade with Whom?



CPP Compliance Pathway Implications on RE Construction

USA Wind and Solar w/ & w/out CPP

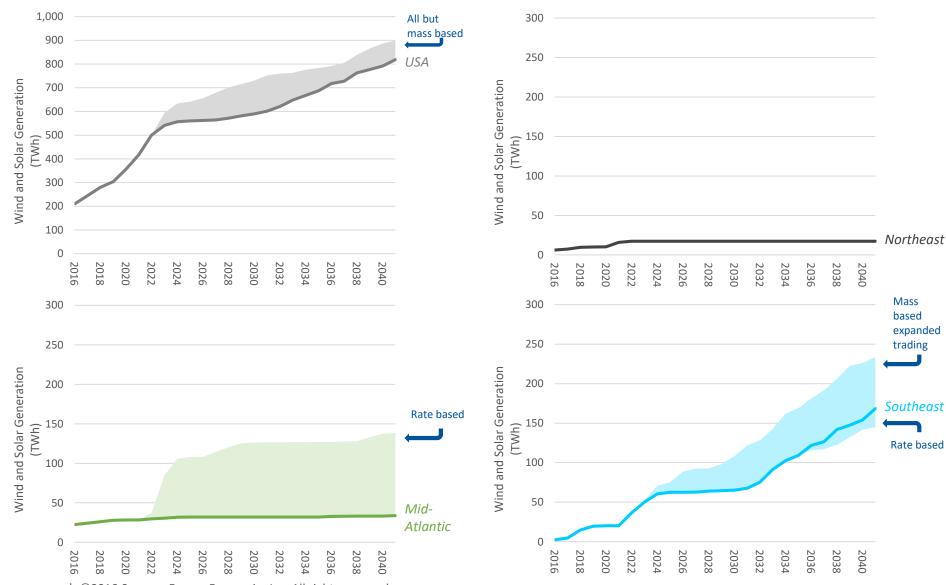


AEO Run Permutations

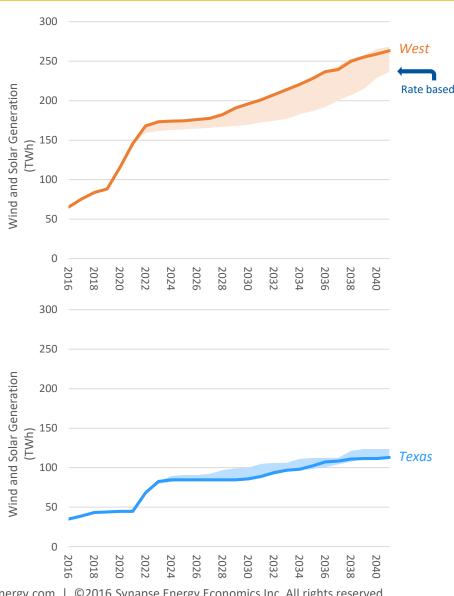
- Reference case: CPP mass-based, new source complement, intraregional trading
- CPP Rate case: intraregional trading
- CPP Extended case: mass-based, new source complement, interregional trading within interconnect
- CPP Hybrid case: RGGI (Northeast) & AB32 (CA) mass-based, remaining rate-based with interregional trading

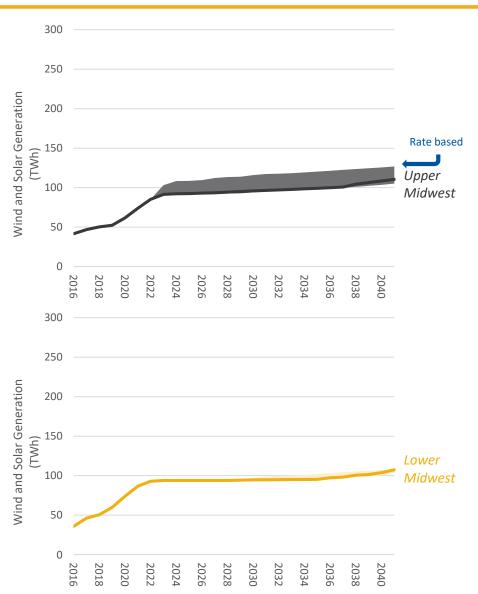
Other cases include Allocation to Generators case, Extended case

AEO Charts: USA, NE, Mid-A, SE



AEO Charts: West, Upper MW, TX, Lower MW





What Else Could Change CPP RE Results?

- Price of natural gas, coal
- Price of wind, solar
- Changes to Clean Power Plan
- Compliance plan permutations of states, especially with respect to rate vs. mass and within an RTO
- Changes to other environmental policies related to fuel extraction, emissions, carbon trading, renewable portfolio standards, net metering, nuclear subsidies, tax credits, ...

Let's talk.

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Related Media

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