In the Matter of:
THE APPLICATION OF KENTUCKY UTILITIES COMPANY FOR CERTIFICATES OF PUBLIC CONVENIENCE AND
NECESSITY AND APPROVAL OF ITS 2011 COMPLIANCE )2011-00161 PLAN FOR RECOVERY BY ENVIRONMENTAL SURCHARGE )

In the Matter of:
THE APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR CERTIFICATES OF PUBLIC CONVENIENCE ) CASE NO. AND NECESSITY AND APPROVAL OF ITS 2011 COMPLIANCE) 2011-00162 PLAN FOR RECOVERY BY ENVIRONMENTAL SURCHARGE )

One Paper Copy of
Sinclair - Appendix B and Schram - Appendix A Filed - October 24, 2011

Sinclair - Appendix B and Schram-Apeendix A

2011-00161

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2011-00162
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public service COMMISSION









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Natural Gas Supply, Disposition, and Prices, Reference case
(trillion cubic feet, unless otherwise noted)

Natural Gas Supply, Disposition, and Prices, AEO2010 Reference case
(trillion cubic feet, unless otherwise noted)


| Supply, Disposition, and Prices | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 G | Growth Rate (2009-2035) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Production |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Dry Gas Production 1/ | 20.56 | 20.6 | 20.01 | 19.46 | 19.28 | 18.9 | 18.91 | 19.29 | 19.3 | 19.42 | 19.59 | 19.79 | 19.98 | 19.92 | 20.1 | 20.53 | 21.17 | 21.31 | 21.65 | 21.85 | 22.09 | 22.26 | 22.38 | 22.53 | 22.71 | 22.96 | 23.18 | 23.27 | 0.50\% |
| Supplemental Natural Gas 2 | 0.05 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.40\% |
| Net Imports | 2.95 | 2.76 | 2.82 | 2.78 | 2.62 | 2.36 | 2.32 | 2.38 | 2.48 | 2.57 | 2.58 | 2.59 | 2.57 | 2.58 | 2.53 | 2.34 | 2.22 | 2.17 | 2.1 | 2.05 | 2 | 1.91 | 1.84 | 1.79 | 1.73 | 1.62 | 1.53 | 1.46 | -2.40\% |
| Pipeline $3 /$ | 2.65 | 2.34 | 2.21 | 2.08 | 1.81 | 1.48 | 1.34 | 1.29 | 1.25 | 1.19 | 1.14 | 1.11 | 1.07 | 1.07 | 1.05 | 0.93 | 0.88 | 0.89 | 0.89 | 0.92 | 0.94 | 0.94 | 0.94 | 0.95 | 0.92 | 0.83 | 0.74 | 0.64 | -4.90\% |
| Liquefied Natural Gas | 0.3 | 0.42 | 0.61 | 0.7 | 0.82 | 0.87 | 0.97 | 1.09 | 1.23 | 1.38 | 1.45 | 1.48 | 1.5 | 1.51 | 1.48 | 1.41 | 1.34 | 1.28 | 1.21 | 1.14 | 1.07 | 0.98 | 0.89 | 0.84 | 0.81 | 0.79 | 0.8 | 0.83 | 2.70\% |
| Total Supply | 23.57 | 23.42 | 22.88 | 22.3 | 21.97 | 21.32 | 21.29 | 21.73 | 21.85 | 22.05 | 22.24 | 22.44 | 22.61 | 22.56 | 22.69 | 22.94 | 23.46 | 23.54 | 23.82 | 23.98 | 24.16 | 24.24 | 24.28 | 24.38 | 24.5 | 24.64 | 24.78 | 24.8 | 0.20\% |
| Consumption by Sector |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Residential | 4.87 | 4.77 | 4.81 | 4.66 | 4.66 | 4.67 | 4.69 | 4.71 | 4.74 | 4.75 | 4.77 | 4.79 | 4.83 | 4.83 | 4.84 | 4.85 | 4.89 | 4.89 | 4.91 | 4.91 | 4.92 | 4.9 | 4.89 | 4.89 | 4.9 | 4.88 | 4.88 | 4.87 | 0.10\% |
| Commercial | 3.12 | 3.07 | 3.2 | 3.18 | 3.19 | 3.18 | 3.21 | 3.23 | 3.25 | 3.27 | 3.29 | 3.32 | 3.33 | 3.35 | 3.37 | 3.39 | 3.42 | 3.45 | 3.48 | 3.5 | 3.52 | 3.54 | 3.55 | 3.57 | 3.59 | 3.62 | 3.65 | 3.69 | 0.70\% |
| Industrial $4 /$ | 6.65 | 5.95 | 6.05 | 6.22 | 6.52 | 6.73 | 6.86 | 6.88 | 6.91 | 6.93 | 6.98 | 7.01 | 7.03 | 7.01 | 6.98 | 6.95 | 6.96 | 6.94 | 6.88 | 6.86 | 6.81 | 6.78 | 6.74 | 6.74 | 6.72 | 6.72 | 6.72 | 6.72 | 0.50\% |
| Natural Gas-to-Liquids Heat and Power 5l | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | O.. |  |
| Natural Gas to Liquids Production 61 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 | 0 | 0 | 0 | 0 | 0 |  |
| Electric Power $7 /$ | 6.66 | 6.86 | 6.55 | 6.11 | 5.68 | 5.04 | 4.82 | 5.18 | 5.23 | 5.38 | 5.46 | 5.56 | 5.66 | 5.6 | 5.71 | 5.89 | 6.23 | 6.28 | 6.57 | 6.7 | 6.88 | 6.99 | 7.04 | 7.13 | 7.23 | 7.34 | 7.43 | 7.42 | 0.30\% |
| Transportation $8 /$ | 0.04 | 0.04 | 0.04 | 0.04 | 0.05 | 0.05 | 0.05 | 0.05 | 0.06 | 0.06 | 0.07 | 0.07 | 0.08 | 0.09 | 0.09 | 0.1 | 0.11 | 0.11 | 0.12 | 0.13 | 0.14 | 0.14 | 0.15 | 0.16 | 0.17 | 0.18 | 0.18 | 0.19 | 6.10\% |
| Pipeline Fuel | 0.63 | 0.61 | 0.62 | 0.6 | 0.6 | 0.58 | 0.59 | 0.6 | 0.6 | 0.6 | 0.61 | 0.61 | 0.62 | 0.61 | 0.62 | 0.65 | 0.69 | 0.7 | 0.7 | 0.71 | 0.71 | 0.71 | 0.72 | 0.72 | 0.72 | 0.72 | 0.72 | 0.72 | 0.60\% |
| Lease and Plant Fuel $9 /$ | 1.28 | 1.29 | 1.25 | 1.18 | 1.13 | 1.07 | 1.07 | 1.08 | 1.07 | 1.07 | 1.08 | 1.09 | 1.09 | 1.09 | 1.1 | 1.14 | 1.19 | 1.19 | 1.21 | 1.22 | 1.22 | 1.23 | 1.23 | 1.23 | 1.24 | 1.24 | 1.26 | 1.25 | -0.10\% |
| Total | 23.25 | 22.59 | 22.51 | 21.99 | 21.82 | 21.32 | 21.29 | 21.74 | 21.86 | 22.07 | 22.25 | 22.45 | 22.63 | 22.58 | 22.71 | 22.96 | 23.49 | 23.57 | 23.85 | 24.02 | 24.2 | 24.29 | 24.33 | 24.43 | 24.56 | 24.7 | 24.84 | 24.85 | 0.40\% |
| Discrepancy 10/ | 0.32 | 0.83 | 0.37 | 0.31 | 0.15 | 0 | 0 | -0.01 | -0.01 | -0.01 | -0.01 | -0.02 | -0.02 | -0.02 | -0.02 | -0.03 | -0.03 | -0.03 | -0.04 | -0.04 | -0.04 | -0.05 | -0.05 | -0.05 | -0.06 | -0.06 | -0.06 | -0.07-- |  |
| Natural Gas Prices |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| (2009 dollars per million Btu) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Henry Hub Spot Price | 8.99 | 3.54 | 4.57 | 5.77 | 6.27 | 6.22 | 6.18 | 6.37 | 6.47 | 6.48 | 6.53 | 6.61 | 6.74 | 6.84 | 7.03 | 7.06 | 7.02 | 7.1 | 7.26 | 7.4 | 7.64 | 7.89 | 8.17 | 8.52 | 8.63 | 8.66 | 8.88 | 9.01 | 3.70\% |
| Average Lower 48 Wellhead Price 11/ | 7.97 | 3.29 | 4 | 5.1 | 5.54 | 5.5 | 5.46 | 5.63 | 5.72 | 5.73 | 5.77 | 5.84 | 5.96 | 6.05 | 6.22 | 6.24 | 6.2 | 6.27 | 6.41 | 6.54 | 6.75 | 6.97 | 7.22 | 7.52 | 7.62 | 7.65 | 7.85 | 7.96 | 3.50\% |
| [2009 dollars per thousand cubic feet] |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Average Lower 48 Wellhead Price 11/ | 8.19 | 3.38 | 4.11 | 5.24 | 5.69 | 5.65 | 5.61 | 5.78 | 5.88 | 5.89 | 5.93 | 6 | 6.12 | 6.22 | 6.39 | 6.42 | 6.38 | 6.45 | 6.59 | 6.72 | 6.94 | 7.17 | 7.42 | 7.73 | 7.83 | 7.86 | 8.06 | 8.19 | 3.50\% |
| Delivered Prices |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Residential | 14.08 | 11.9 | 11.38 | 12.3 | 12.4 | 11.99 | 11.92 | 12.07 | 12.17 | 12.21 | 12.28 | 12.36 | 12.49 | 12.61 | 12.81 | 12.84 | 12.74 | 12.84 | 13.02 | 13.22 | 13.48 | 13.75 | 14.04 | 14.39 | 14.55 | 14.66 | 14.88 | 15.04 | 0.90\% |
| Commercial | 12.48 | 9.45 | 9.06 | 10.16 | 10.52 | 10.36 | 10.29 | 10.44 | 10.54 | 10.56 | 10.62 | 10.69 | 10.82 | 10.93 | 11.12 | 11.16 | 11.1 | 11.18 | 11.35 | 11.53 | 11.79 | 12.03 | 1231 | 12.65 | 12.8 | 12.87 | 13.08 | 13.22 | 1.30\% |
| Industrial ${ }^{\text {/ }}$ | 9.52 | 4.33 | 5.09 | 6.24 | 6.68 | 6.62 | 6.56 | 6.73 | 6.81 | 6.8 | 6.84 | 6.89 | 7 | 7.09 | 7.28 | 7.33 | 7.28 | 7.33 | 7.47 | 7.61 | 7.85 | 8.07 | 8.34 | 8.66 | 8.77 | 8.79 | 9 | 9.12 | 2.90\% |
| Electric Power 71 | 9.48 | 4.31 | 5.05 | 6.07 | 6.43 | 6.19 | 6.15 | 6.34 | 6.43 | 6.44 | 6.48 | 6.55 | 6.69 | 6.79 | 6.98 | 7.03 | 6.98 | 7.04 | 7.2 | 7.35 | 7.58 | 7.83 | 8.06 | 8.37 | 8.48 | 8.52 | 8.71 | 8.82 | 2.80\% |
| Transportation 12/ | 16.67 | 11.87 | 12.53 | 13.67 | 14.09 | 13.96 | 13.85 | 13.97 | 14.01 | 13.98 | 13.97 | 13.98 | 14.04 | 14.07 | 14.18 | 14.15 | 14 | 14.03 | 14.14 | 14.26 | 14.44 | 14.62 | 14.83 | 15.1 | 15.19 | 15.19 | 15.35 | 15.44 | 1.00\% |
| Average 13/ | 10.99 | 6.86 | 7.17 | 8.21 | 8.56 | 8.4 | 8.37 | 8.5 | 8.58 | 8.58 | 8.63 | 8.69 | 8.81 | 8.93 | 9.11 | 9.15 | 9.06 | 9.13 | 9.28 | 9.43 | 9.67 | 9.91 | 10.17 | 10.49 | 10.62 | 10.66 | 10.86 | 11 | 1.80\% |
| (nominal dollars per million 8 Etu) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Henry Hub Spot Price | 8.86 | 3.54 | 4.64 | 5.93 | 6.53 | 6.6 | 6.67 | 6.99 | 7.23 | 7.38 | 7.57 | 7.8 | 8.11 | 8.41 | 8.84 | 9.06 | 9.2 | 9.49 | 9.91 | 10.31 | 10.88 | 11.48 | 12.15 | 12.94 | 13.4 | 13.74 | 14.4 | 14.92 | 5.70\% |
| Average Lower 48 Wellhead Price 11/ | 7.85 | 3.29 | 4.06 | 5.24 | 5.77 | 5.83 | 5.89 | 6.17 | 6.39 | 6.52 | 6.69 | 6.89 | 7.17 | 7.43 | 7.81 | 8.01 | 8.13 | 8.38 | 8.75 | 9.11 | 9.61 | 10.14 | 10.73 | 11.43 | 11.84 | 12.14 | 12.72 | 13.18 | 5.50\% |
| (nominal dollars per thousand cubic feet) Average Lower 48 Wellhead Price 11/ | 8.07 | 3.38 | 4.17 | 5.39 | 5.94 | 6 | 6.06 | 6.35 | 6.57 | 6.7 | 6.88 | 7.08 | 7.37 | 7.64 | 8.03 | 8.23 | 8.35 | 8.62 | 9 | 9.37 | 9.88 | 10.43 | 11.03 | 11.75 | 12.17 | 12.48 | 13.07 | 13.55 | 5.50\% |
| Dellvered Prices |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Residential | 13.87 | 11.9 | 11.54 | 12.65 | 12.93 | 12.72 | 12.87 | 13.25 | 13.6 | 13.9 | 14.24 | 14.59 | 15.03 | 15.5 | 16.09 | 16.47 | 16.69 | 17.16 | 17.76 | 18.42 | 19.19 | 20 | 20.88 | 21.87 | 22.61 | 23.26 | 24.12 | 24.9 | 2.90\% |
| Commercial | 12.29 | 9.45 | 9.19 | 10.44 | 10.96 | 10.99 | 11.11 | 11.46 | 11.77 | 12.01 | 12.31 | 12.62 | 13.02 | 13.43 | 13.97 | 14.33 | 14.54 | 14.95 | 15.49 | 16.07 | 16.78 | 17.5 | 18.3 | 19.23 | 19.9 | 20.43 | 21.21 | 21.89 | 3.30\% |
| Industrial 4/ | 9.38 | 4.39 | 5.17 | 6.41 | 6.96 | 7.02 | 7.09 | 7.39 | 7.6 | 7.74 | 7.93 | 8.14 | 8.43 | 8.71 | 9.14 | 9.4 | 9.53 | 9.8 | 10.19 | 10.61 | 11.17 | 11.74 | 12.39 | 13.16 | 13.63 | 13.96 | 14.58 | 15.1 | 4.90\% |
| Electric Power 71 | 9.34 | 4.31 | 5.13 | 6.24 | 6.71 | 6.57 | 6.64 | 6.96 | 7.18 | 7.32 | 7.52 | 7.74 | 8.06 | 8.35 | 8.77 | 9.02 | 9.15 | 9.41 | 9.83 | 10.24 | 10.8 | 11.39 | 11.98 | 12.72 | 13.18 | 13.52 | 14.12 | 14.61 | 4.80\% |
| Transportation 12/ | 16.42 | 11.87 | 12.72 | 14.06 | 14.69 | 14.81 | 14.95 | 15.33 | 15.65 | 15.9 | 16.19 | 16.5 | 16.9 | 17.29 | 17.82 | 18.16 | 18.35 | 18.76 | 19.3 | 19.87 | 20.56 | 27.27 | 22.04 | 22.95 | 23.6 | 24.12 | 24.89 | 25.56 | 3.00\% |
| Average 13/ | 10.83 | 6.86 | 7.28 | 8.44 | 8.92 | 8.92 | 9.03 | 9.33 | 9.59 | 9.77 | 10 | 10.26 | 10.61 | 10.97 | 11.45 | 11.74 | 11.87 | 12.21 | 12.66 | 13.15 | 13.76 | 14.41 | 15.11 | 15.94 | 16.5 | 16.92 | 17.6 | 18,2 | 3.80\% |

[^0]business is to sell electricity, or
8/Compressed natural gas used as vehicle fuel.
9/ Represents natural gas used in well, field, and lease operations, and in natural gas processing plant machinery.
$10 /$ Balancing item. Natural gas lost as a result of converting flow date measured at varying temperatures and
pressures to a standard temperature and pressure and the merger of different data reporting systems which
vary in scope, format, definition, and respondent type. In addition, 2008 and 2009 values
11/ Represents lower 48 onshore and offshore supplies.
$12 /$ Compressed natural gas used as a vehicle fuel. Price includes estimated motor vehicle fuel taxes
and estimated dispensing costs or charges.
-- = Not applicable.
Note: Totais may not equal sum of components due to independent rounding. Data for 2008 and 2009
are model results and may differ slightiy from official EIA data reports.
Sources: 2008 supply values; and lease, plant, and pipeline fuel con
Sources: 2008 supply values; and lease, plant, and pipeline fuel consumption: Energy
Information Administration (EIA), Natural Gas Annual 2008, DOE/EA-0131(2008) (Washington, DC. March 2010).
2009 supply values; and lease, plant, and pipeline fuel consumption; and wellhead price: EIA,
Natural Gas Monthly, DOEFEIA-0130(2010/07) (Washington, DC. July 2010).
Natural Gas Monthly, DOEFEIA-0130(2010/O7) (Washington, DC. July 2010].
Other 2008 and 2009 consumption based on: ElA,
Annual Energy Review 2009, DOEJEIA-0384(2009) (Washington, DC. August 2010).
2008 wellhead price: Bureau of Energy Management, Regulation and Enforcement; and EIA, Natural Gas Annual
2008 wellhead price: Bureau of Energy Management, Regulation
2008 , DOE/EIA-0131 (2008) (Washington, DC, March 2010).
2008 residential and commercial delivered prices: ElA, Natural Gas Annual
2008, DOE/EIA-013 $\ddagger(2008)$ (WashIngton, DC, March 2010).
2009 residential and commercial delivered prices: EIA, Natural Gas Monthly, DOE/EIA-0130
Electric Power Monthly, DOE/EIA-0226, April 2009 and April 2010, Table 4.13.B. 2008 and 2009
industrial dellvered prices are estimated based on: EIA, Manufacturing Energy Consumption Survey and industrial
and wellhead prices from the Natural Gas Annual 2008, DOE/EIA-0131(2008) (Washington, DC. March 20t0)
and the Natural Gas Monthly, DOE/EIA-0130(2010/O7) (Washington, DC, Juty 2010). 2008 transportation sector
(Washington, DC, March 2010 ) delivered prices are based on: EIA, Natural Gas Annual 2008, DOE/EIA-013
and estimated state taxes, federal taxes, and dispensing costs or charges.
2009 transportation sector delivered prices are model results.
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\begin{aligned}
& 2009 \text { transportation sector delivered prices are model results. } \\
& \text { Projections: EIA, AEO2011 National Energy Modeling System. }
\end{aligned}
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REDACTED DSS- FIGURE 1 - Synapse Gas Prices and Comparisons (Supplemental) PUBLIC.xlsx
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Navigant- Appendix D: Henry Hub Price Forecast Comparison Table (2009\$) Market Analysis for Sabine Pass LNG Export Project


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Note: The values above reflect the correction of the landfill cost error identified by Dr. Fisher and the error identified by the Companies' in response to Supplemental Requests for Information of Rick Clewett, Raymond Barry, Sierra Club and the Natural Resource Defense Council dated August 18, 2011, Question No. 8(b).
Coal Units in Portfolio




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|  | 칯 |  | $\begin{aligned} & \text { Ñ } \\ & \stackrel{\sim}{\tilde{W}} \\ & \underset{\sim}{n} \end{aligned}$ |  |  | 命\| | त्तٍ | $\ddot{n}^{\circ}$ |  |
|  | 등 |  <br>  | $\begin{aligned} & \text { Nog } \\ & \text { 导 } \\ & \text { 品 } \end{aligned}$ | $\begin{aligned} & \text { 皆 } \\ & \text { 合 } \end{aligned}$ | $\begin{aligned} & \text { 导 } \\ & \text { 守 } \\ & \text { 保 } \end{aligned}$ | 枵合 |  | 뷲 꾺 무국 |  |
|  | $\stackrel{\oplus}{c}$ |  |  |  |  | 芦芦\| | 的 | $\stackrel{\sim}{n} \underset{\sim}{\sim}$ |  |
|  | 枵 |  | 䇧号尔 | $\begin{aligned} & \text { mo } \\ & \text { 悥 } \\ & \text { Non } \end{aligned}$ |  | 헴 | 节\| | 험 |  |
|  | $\stackrel{\sim}{\sim}$ |  | $\begin{aligned} & \text { N } \\ & \text { N N } \\ & \text { Non } \\ & \end{aligned}$ | $\begin{aligned} & \stackrel{n}{n} \\ & \text { Nin } \\ & \text { nin } \end{aligned}$ |  | ${\underset{\sim}{p}}^{\stackrel{n}{m} \underset{\sim}{n}}$ | 芲品品员 |  |  |
|  |  | 多名然NN <br>  |  |  | $\begin{aligned} & \underset{N}{N} \\ & \underset{\sim}{\sim} \\ & \underset{\sim}{4} \end{aligned}$ |  | 륭 | $\stackrel{\text { 팰 }}{\stackrel{m}{7}}$ | 이숭문 |
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## 10／18／2011

＊All cases use AESC Gas Prices in Nominal \＄

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Annual Nominal RR Delta $\$ \mathrm{M}$
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Mid $\mathrm{CO2}$ Cumulative Nominal RR Delta $\$ \mathrm{M}$
No CO2
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## Annual PVRR Delta（\＄M） No CO2 Low CO2 Mid CO2

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10／18／2011
＊All cases use AESC Gas Prices in Nominal \＄
$\begin{array}{ll}\text { Retire：} & \text { CO2 Prices：} \\ \text { TY3，GR3－4，CR4－5，BR1－2，and MC1－2 } & \text { Mid } \\ \text { TY3，GR3－4，CR4－6．BR1－2，and MC1－2 } & \text { Low }\end{array}$
$\begin{array}{ll}\text { TY3，GR3－4，CR4－6，BR1－2，and MC1－2 } & \text { Mid } \\ \text { TY3，GR3－4，CR4－6．BR1－2，and MC1－2 } & \text { Low }\end{array}$ $\begin{array}{ll}\text { TY3，GR3－4，CR4－6，BR1－2，and MC1－2 } & \text { None } \\ \text { TY3，GR3－4，and CR4－6 } & \text { Mid } \\ \text { TY3，GR3－4，and CR4－6 } & \text { Low } \\ \text { TY3，GR3－4，and CR4－6 } & \text { None }\end{array}$

No CO2
Delta
Cumulative Delta
Low CO2
Cumulative Delta
Mid CO2
Delta

## Annual Nominal RR Delta $\$ \mathrm{~S} M$ No CO 2


Cumulative
No CO2
Low CO2
Mid CO2
Annual PVRR Deita（\＄M）
敋等膏
PVRR Delta Through Future Years（2011 \＄M）


| Retire TY3, GR3-4, CR4-6, BR1-2, and MC1-2 |  |  | Retire TY3, GR3-4, and CR4-6 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| No CO2 | Low CO2 | Mid CO2 | No CO2 | Low CO2 | Mid CO2 |
| $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |
|  |  |  | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |
| $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |  |  |  |
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| 2×1C(1) | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | 2x1C( 1) | $3 \times 1 \mathrm{C}$ (1) | $3 \times 1 \mathrm{C}(1)$ |
| $3 \times 1 \mathrm{C}(1)$ |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |
|  | $3 \times 1 \mathrm{C}(1)$ | SCCT ( 1) |  |  |  |


$3 \times 1 C=3 \times 1$ Combined Cycle Combustion Turbine $2 \times 1 \mathrm{C}=2 \times 1$ Combined Cycle Combustion Turbine

SCCT = Simple Cycle Combustion Turbine

CO2 Emissions Allowance Price Forecast

2\% Inflation Rate
17.57
21.42
25.39
29.53
33.82
38.26
42.88
47.67
52.62
57.76
63.09
68.59
74.30
80.21
86.33
92.66
99.21
105.98
112.99
120.23
127.72
135.46
143.46


Synapse's $\mathrm{CO}_{2}$ Price Forecasts


|  |  | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | No <br> Retirements | Retire: | TY GR3 | TYGR3BR3 | TY GR3 CR4 | $\frac{\text { TY GR3 CR4 }}{\text { CR6 }}$ | $\frac{\text { TY GR3 } C R 4}{}$ | TYGR3CR | $\frac{\text { TYGR3CR }}{\text { GH3 }}$ | $\frac{T Y G R 3 C R}{\underline{G H 1}}$ | TY GRCR | $\frac{T Y G R C R}{M C 4}$ | $\frac{T Y G R C R}{T C 1}$ | $\frac{\text { TY GR CR }}{\underline{G H 4}}$ | $\frac{T Y G R C R}{M C B}$ | $\frac{T Y G R C R}{G H 2}$ | $\frac{\text { TY GR CR }}{\text { MCI-2 }}$ | $\begin{aligned} & \text { TY GR CR } \\ & \text { BR1-2 MC1-2 } \end{aligned}$ | $\frac{\text { TY GR CR }}{\text { BR1-2 }}$ |
| 2010 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2011 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2012 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2013 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2014 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2015 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2016 |  | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{Cl}$ (1) | $3 \times 1 \mathrm{Cl}$ (1) | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}(2)$ | $3 \times 1 \mathrm{C}$ 2) |
|  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2018 |  |  |  |  |  |  | $3 \times 10(1)$ |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |
| 2019 |  |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |
| 2020 |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |
| 2021 |  |  |  |  |  |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  | $3 \times 1$ ( 1) |  | $3 \times 1 \mathrm{C}$ (1) |  |  |  |
| 2022 |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |  |  | $3 \times 1 \mathrm{C}(1)$ |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |
| 2023 |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |
| 2024 | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{Cl}$ (1) |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |
| 2025 |  |  |  |  |  |  |  | 2xic ( 1) |  |  |  |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |
| 2026 |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |
| 2027 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2028 |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ | 3x1C(1) |  |  |  |
| 2029 |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |
| 2030 | $2 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  |  |  |  |  |  |
| 2031 |  |  |  |  |  |  | $2 \times 1 \mathrm{Cl}$ (1) |  |  |  | $2 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  | $2 \times 1 \mathrm{C}(1)$ |  |
| 2032 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2033 |  |  |  | $3 \times 1 \mathrm{C}(1)$ |  | $3 \times 1$ ( 1) |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2034 |  |  |  |  |  |  |  |  |  |  |  |  |  | $3 \times 1 \mathrm{Cl}$ (1) |  | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |  |  |
| 2035 | 3x1C( 1) |  |  |  | $3 \times 1$ C( 1) |  |  |  | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |  | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1$ C( 1) |  | $3 \times 1 \mathrm{Cl}(1)$ |  |  |  |  |
| 2036 |  | $2 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |  |  |  | $3 \times 1 \mathrm{C}(1)$ | $2 \times 1 \mathrm{C}$ ( 1) |  |  | $3 \times 1 \mathrm{C}(1)$ |  |  |  |  |  |  | $3 \times 1 \mathrm{C}(1)$ | $3 \times 1 \mathrm{C}(1)$ |
| 2037 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2038 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2039 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2040 |  |  |  | $\operatorname{scct}(1)$ |  | scct ( 1 ) |  |  |  |  |  |  |  |  |  |  | $\operatorname{scct}(1)$ |  |  |


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| Retire TY GR CR and MC4 Retire TY GR CR and TC1 Retire TY GR CR and MC3 Retire TY GR CR and GH2 Retire TY GR CR BR1－2 and MC1－2 Retire TV GR CR and BR1－2 |  |
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\begin{tabular}{|c|c|c|c|c|c|c|c|c|c|c|c|}
\hline Retirement Cost & 2021 & 2022 & 2023 & 2024 & 2025 & 2026 & 2027 & 2028 & 2029 & 2030 & 2031 \\
\hline All Units & 0 & 0 & 0 & 0 & 0 & 0 & 0 & 0 & 0 & 0 & 0 \\
\hline \multicolumn{12}{|l|}{2\% Escalation Rate} \\
\hline \multicolumn{12}{|l|}{Unit Costs (\$000)} \\
\hline BR1 & 4,651 & 4,744 & 4,838 & 4,935 & 5,034 & 5,135 & 5,237 & 5,342 & 5,449 & 5,558 & 5,669 \\
\hline BR2 & 8,498 & 8,668 & 8,841 & 9,018 & 9,199 & 9,383 & 9,570 & 9,762 & 9,957 & 10,156 & 10,359 \\
\hline BR3 & 17,462 & 17,811 & 18,167 & 18,531 & 18,901 & 19,279 & 19,665 & 20,058 & 20,460 & 20,869 & 21,286 \\
\hline CR4 & 14,094 & 14,375 & 14,663 & 14,956 & 15,255 & 15,560 & 15,872 & 16,189 & 16,513 & 16,843 & 17,180 \\
\hline CR5 & 14,987 & 15,286 & 15,592 & 15,904 & 16,222 & 16,546 & 16,877 & 17,215 & 17,559 & 17,910 & 18,269 \\
\hline CR6 & 11,919 & 12,157 & 12,400 & 12,648 & 12,901 & 13,159 & 13,423 & 13,691 & 13,965 & 14,244 & 14,529 \\
\hline GH1 & 21,050 & 21,471 & 21,900 & 22,338 & 22,785 & 23,240 & 23,705 & 24,179 & 24,663 & 25,156 & 25,659 \\
\hline GH2 & 15,735 & 16,049 & 16,370 & 16,698 & 17,032 & 17,372 & 17,720 & 18,074 & 18,436 & 18,804 & 19,181 \\
\hline GH3 & 14,616 & 14,909 & 15,207 & 15,511 & 15,821 & 16,138 & 16,460 & 16,790 & 17,125 & 17,468 & 17,817 \\
\hline GH4 & 14,183 & 14,467 & 14,756 & 15,051 & 15,352 & 15,659 & 15,973 & 16,292 & 16,618 & 16,950 & 17,289 \\
\hline GR3 & 5,108 & 5,210 & 5,314 & 5,421 & 5,529 & 5,640 & 5,753 & 5,868 & 5,985 & 6,105 & 6,227 \\
\hline GR4 & 10,115 & 10,317 & 10,523 & 10,734 & 10,949 & 11,167 & 11,391 & 11,619 & 11,851 & 12,088 & 12,330 \\
\hline MC1 & 14,844 & 15,141 & 15,444 & 15,753 & 16,068 & 16,389 & 16,717 & 17,051 & 17,392 & 17,740 & 18,095 \\
\hline MC2 & 17,810 & 18,166 & 18,530 & 18,900 & 19,278 & 19,664 & 20,057 & 20,458 & 20,867 & 21,285 & 21,710 \\
\hline MC3 & 20,177 & 20,581 & 20,993 & 21,412 & 21,841 & 22,278 & 22,723 & 23,178 & 23,641 & 24,114 & 24,596 \\
\hline MC4 & 20,205 & 20,609 & 21,021 & 21,442 & 21,871 & 22,308 & 22,754 & 23,209 & 23,674 & 24,147 & 24,630 \\
\hline TC1 & 20,390 & 20,798 & 21,214 & 21,638 & 22,071 & 22,512 & 22,962 & 23,422 & 23,890 & 24,368 & 24,855 \\
\hline TY3 & 490 & 500 & 510 & 520 & 530 & 541 & 552 & 563 & 574 & 586 & 597 \\
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\(\frac{\text { Year Equipment }}{2014}\) PJFF／PAC
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2014 SAM Mitigation
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2015 SAM Mitigation 2015 Combined 1\＆2 FGD 2015 PJFF／PAC
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\section*{Advocacy group: Fracking makes natural gas 'bridge to nowhere'}

\section*{June 14, 2011}

\section*{By Bryan Schutt}

Advocacy group Food \& Water Watch on June 13 called for a nationwide ban on hydraulic fracturing in shale gas plays and advocated for an aggressive investment in energy efficiency and renewable energy.
"What we've seen happen with fracking, what we know and don't know about fracking is enough to ban the practice from going forward," Jim Walsh, New Jersey director of Food \& Water Watch, said in an interview. "We don't really see a responsible way for this practice to continue to go forward, which is why we're calling for a ban on fracking. We don't think it's going to be able to be done safely."

In a new report detailing their concerns, Food \& Water Watch said the rapid expansion of shale gas extraction has left behind a trail of environmental and economic. problems in rural communities.
"Accidents and leaks have polluted rivers, streams and drinking water supplies. Regions peppered with drilling rigs have high levels of smog as well as other airborne pollutants, including potential carcinogens. Rural communities face an onslaught of heavy truck traffic - often laden with dangerous chemicals used in drilling - and declining property values," according to the report. "The 'bridge fuel' of fracking could well be a bridge to nowhere."

The report summarized 10 studies about the environmental effects of hydraulic fracturing operations and concluded that the wellstimulation technique poses an unacceptable risk to the nation. Further, Food \& Water Watch said increased use of fracking represents a "misguided energy policy direction for the United States."

While the gas industry has launched a massive lobbying campaign to sell natural gas to lawmakers and the public, the group criticized regulators for being asleep at the switch. "The current loopholeridden laws and haphazard enforcement leave communities and the environment vulnerable to fracking pollution," the report said. "To safeguard public health and the environment, the federal government should ban shale gas fracking and invest in a sustainable energy future for the country."

Food \& Water Watch released the report as part of its anti-gas lobby in New Jersey, which Walsh believes is gaining traction among legislators. "Right now, I believe there is about 12 legislators that have signed on in support," he said. "The ban bill also unanimously moved out of the Senate Environment Committee with votes from Republicans and Democrats."

In addition to a fracking ban, Walsh said, the state should prohibit all activities related to hydraulic fracturing such as water withdrawals and waste disposals that support the industry. "Spills, trucking accidents and things like that from waste coming into the state could adversely impact our drinking water."

Although there has not been much industry interest in shale acreage in New Jersey, the ban would represent more than symbolism, Walsh said. "In the northwestern part of the state, there are shale deposits that have the hydrocarbons. Even though there aren't leases pending right now, the only reason I believe the industry isn't going after those deposits is because they are a lot deeper than the Marcellus Shale in Pennsylvania and New York."

The New Jersey Sierra Club and Delaware Riverkeeper Network joined Food \& Water Watch in calling for a fracking ban.
"The first rule in public health and safety is do no harm, and right now there is no fracking way that it is safe and a ban should be in place," Jeff Tittel, director of the New Jersey Sierra Club, said in a statement. "Until we get rid of the Halliburton loophole that exempts fracking from seven major federal environmental laws, including Superfund and the Clean Water Act, until all the different studies are done that independently analyze the impacts of fracking, we should not allow fracking to go forward. It is too risky to our environment and water supplies." \(\boldsymbol{i}\)

\title{
CNYOG's MARC I project becomes battleground for Marcellus Shale opponents
}

\section*{July 13, 2011}

\section*{By Sean Sullivan}

Central New York Oil and Gas Co. LLC defended FERC's positive environmental review of the MARC I Hub Line Project on July 11 as environmental groups and thousands of individuals poured into the FERC proceeding, protesting not only the natural gas pipeline expansion but all Marcellus Shale development.

Protests came from lawmakers; environmental groups including the Coalition for Responsible Growth \& Resource Conservation, Damascus Citizens for Sustainability, the Sierra Club and Trout Unlimited; and citizen comments, including more than 20,000 form letters filed as part of an Earthjustice online campaign. They objected to FERC's finding that the Pennsylvania project would have no significant impact on the environment. They asked for a full environmental impact statement, including a review of the cumulative impacts of all Marcellus Shale gas infrastructure and activity.
The case is an example of how opponents of shale development might use the FERC review process for pipelines and storage projects to broadly challenge production activity not normally under the commission's jurisdiction.
In its comments, CNYOG supported the May 27 environmental assessment prepared by FERC staff as "both comprehensive and detailed."The Inergy LP subsidiary said a more involved environmental impact statement is "unnecessary." The MARC I Hub Line Project would be a roughly \(40-\mathrm{mile}, 30\)-inch-diameter bidirectional pipeline in Bradford, Sullivan and Lycoming counties, Pa.
"The EA addresses all major areas of environmental concern, including: geology, soils, water resources and wetlands, vegetation and wildlife, endangered and threatened species, land use, socioeconomics, cultural resources, air quality and noise levels, reliability and safety," CNYOG said.
CNYOG noted that it intends to comply with FERC's proposed environmental mitigation measures. As an example, the company said the Audubon Society's concern that it had not filed a migratory bird assessment and habitat restoration plan is addressed by a recommendation in FERC's environmental assessment. Under that requirement, CNYOG would have to file that assessment and plan before beginning construction. In comments submitted by its Pennsylvania office, the Audubon Society called Marcellus Shale development the "single largest threat" to Pennsylvania forest habitat.

CNYOG ripped into the comments produced by Earthjustice, which describes itself as a nonprofit environmental law firm. "These 'comments' were the product of an Internet campaign in which Earthjustice indicated that it would submit comments to the commission on behalf of persons who submitted their name and pertinent information on Earthjustice's website," the company said. "This
campaign, while producing an impressive number of 'comments,' also demonstrates the substantive weakness of the mass filing."
At the time of its comments, CNYOG said, only 37 of the thousands of letters gathered by the Earthjustice campaign were from residents of the three counties around the MARC I project. The company said the letters represented the general public's fear of the environmental impacts of hydraulic fracturing and other aspects of shale development, stoked by a "less-than-objective" description of the project on the Earthjustice website. CNYOG also said a number of letters were duplicates or their senders could not be identified, and "reflect the absence of any attempt at culling of obviously defective submissions."
Members of the Pennsylvania General Assembly, led by state Rep. Richard Mirabito, sent a letter to FERC expressing concerns about the project "on behalf of the tens of thousands of citizens that we represent."
"While natural gas drilling is already impacting the area," the lawmakers wrote, "we believe that construction of a 39-mile transmission pipeline as proposed in this project without an adequate environmental assessment is beyond what this region should be asked to bear and may cause irreparable harm." (CP10-480) i

\section*{9. EMIISSIONS:}

\section*{E.U. emissions show biggest annual increase in 20 years}

Published:Tuesday, October 11, 2011
The European Union, despite major gains in green initiatives, is about to set a record for the biggest yearly hike in carbon emissions in 20 years, according to preliminary data from the European Environment Agency.

Incremental economic recovery and an unusually cold winter, which caused consumers to heat their homes for longer, pushed 2010 emissions up by 2.4 percent from the previous year. The jump is the biggest annual increase since 1990.

Until now, the biggest increase was in 1996, when emissions from the 27-member union rose by 2 percent from 1995 levels. The increase last year follows a 7 percent drop in annual emissions in 2009 due to slowed industrial production from the recession and growth in renewable energy electricity generation.

The 15 E.U. countries with obligations under the Kyoto Protocol are largely on track to meet their obligations. Emissions have dropped by 10.6 percent since 1990, surpassing the pledge to cut levels by 8 percent between 2008 and 2012. Three of the countries -- Italy, Austria and Luxembourg - are falling behind in their reduction goals, however.

The E.U. bloc of 27 nations also has a separate plan to cut its emissions by 20 percent by 2020 compared to 1990 levels. It has already achieved a 15.5 percent decrease since 1990, but the European Environment Agency, an E.U. body based in Copenhagen, Denmark, says that more needs to be done.

Existing European plans "do not project enough emission reductions for the E.U. to meet its unilateral 20 per cent reduction commitment in 2020 ," said the agency. "Additional measures currently planned by member states will help further reduce emissions but will be insufficient to achieve the important emission cuts needed in the longer term" (Pilita Clark, Financial Times, Oct. 7). .- JP

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\title{
The EU Emission Trading Scheme: designed by committee \({ }^{1}\)
}

\author{
By Arnold Mulder
}

Ever since the EU Emissions Trading Scheme (EU ETS) came into effect on January 1st 2005, it has been surrounded by uncertainty. Although the scheme is intended as the most powerful weapon in the effort to reduce European carbon emissions, doubts about its effectiveness and feasibility have remained. In theory, 'the ETS should allow the European Union to achieve its emission reduction target under the Kyoto Protocol at a cost of below 0.1\% of GDP, significantly less than would otherwise be the case', according to the European Commission (2008). In practice, the efficiency and effectiveness of the ETS remain questionable.

\section*{The challenge to reduce emissions}

The European Commission aims to reduce 'domestic' carbon emissions by \(20 \%\) in 2020 compared to 1990. The EU ETS is the flagship in the EU's efforts to meet this goal. The scheme covers all sectors with substantial carbon emissions from point sources, such as the power, steel, iron, petroleum and gas sectors. Mobile sources of emissions (e.g. the transport sector) are not yet included in the ETS.

The fact that the ETS focuses on large, stationary and concentrated sources of carbon emissions is no coincidence. Reducing emissions from a few power plants is easier than reducing emissions from millions of cars. Because the large stationary sources are all covered by the ETS, a stricter reduction target is applied to these sectors than to sectors outside the emissions trading scheme. Effectively, the EU ETS sectors are expected to reduce their emissions by \(21 \%\) between 2005 and 2020, while sectors outside the scheme are projected to reduce their emissions by merely \(10 \%\). Together the reductions suffice to meet the \(20 \%\) goal in 2020 .

The emphasis on the sectors covered by the ETS underlines the key role of the emissions trading scheme: if the \(21 \%\) reduction target is not met, achieving the overall reduction target will be nearly impossible, because it would require a stronger reduction in sectors where emissions reduction are already more difficult or more costly to achieve. Therefore, meeting the ETS target is crucial.

\section*{Why cap and trade is assumed to be effective and efficient...}

Under the ETS, allowances are distributed to all the installations included in the scheme. A single allowance provides the owner the right to emit one tonne of \(\mathrm{CO}_{2}\) into the atmosphere. Because the number of allowances issued in a year can be set to a specific level, the scheme is assumed to be an effective means to reduce emissions. The level of

\footnotetext{
\({ }^{1}\) Published April 18 \({ }^{\text {th }}\), 2011, in European Energy Review, see http://www.europeanenergyreview.eu/site/pagina.php?id=2914\#artikel 2914
}
emissions is limited after all by the number of issued allowances. If companies fail to buy allowances when they exceed their emission limits, they will incur a high penalty. The penalty is set far above the actual market price for allowances, so cheating does not pay off.
By progressively reducing the number of issued allowances towards the desired level, the EU should be able achieve its 2020 reduction targets with great certainty. Companies will either have to buy allowances if they don't reduce their emissions sufficiently, or they will have to invest in low-carbon technologies to reduce their emissions. This is also assumed to be the most efficient mechanism to reduce emissions, as market forces will ensure that firms with the lowest-cost technology available will invest first. Thus, the emissions reduction target is achieved against the lowest possible cost.

If this is so, then why, as indicated above, do the efficiency and effectiveness of the ETS remain in doubt?

\section*{...and why the EU ETS is not}

The answer is that there is a big difference in how the scheme was designed in theory and how it works in practice. The actual design of the EU ETS is nothing like the stylized, effective and efficient trading scheme described above. With 30 national governments, various industries and lobby groups involved in the scheme, the actual design of the EU ETS is the result of a compromise between all stakeholders. This compromise has led to a sub-optimal design with several flaws which undermine the effectiveness and efficiency of the scheme. In fact, under the current regime the scheme is unlikely to incentivize substantial investments in low-carbon technologies until 2020.

A recent study (see Mulder and Bos, 2010) by the University of Groningen (RuG) and Dutch technological consultancy TNO shows that the probability of achieving the EU ETS reduction target is very low indeed.

Investments will only take place if allowances are in scarce supply or are expected to be in short supply in the near future. Otherwise there is no incentive to invest in emission reduction technology. However, the EU ETS suffers from a large oversupply of allowances.

According to the study by the RuG and TNO, on average, a total of 1.4 billion allowances are expected to be carried over to Phase III of the EU ETS which starts in 2013. The excess of 1.4 billion allowances will have been built up over the course of Phase II of the ETS (2008-2012) and is equivalent to approximately \(70 \%\) of the European demand for allowances in 2009. To put it in another perspective: the surplus would suffice to cover the Dutch demand for allowances for a full 16 years. As a result, allowances are not scarce, which minimizes the pressure on firms to reduce their emissions and puts downward pressure on the carbon price.

Starting in 2013 the number of allowances issued will be reduced by \(1.74 \%\) on an annual basis. However, this does not imply that the market will move from an annual surplus to
an annual shortage immediately. Although the annual surplus will decrease, on average the market is expected to remain in oversupply until 2020 under the current regime. As a result, if EU ETS policy remains unchanged, the total surplus is expected to grow from 1.4 billion by the end of 2012 to 2.1 billion in 2020.

\section*{Sources of oversupply}

The reason for the oversupply in the market is that the design of the EU ETS includes a number of regulations (loopholes) that allow for a gradual buildup of allowances over time. Three main sources of oversupply can be identified:

\section*{1. Banking of Allowances}

As of the beginning of Phase II in 2008, firms were allowed to bank their excess allowances. Before that time, during Phase I (2005-2007), allowances could only be used to offset emissions in a specific year and lost their function and value afterwards. The new rule implied that any allowances in excess of immediate demand could now be transferred to future periods and, as such, would hold their value over time. This change enhanced the tradability of allowances but it also meant that emissions were no longer limited to the number of allowances issued in a particular year.

This means that whereas in the past the European Commission could set annual emission levels that would gradually lead to the desired end target, now it can only control the cumulative number of allowances issued over the 13-year period (2008-2020). The result of this banking rule is that you get a so-called waterbed-effect in the market: lower emissions today allow for higher levels of emissions tomorrow. This makes the system vulnerable to sudden demand shocks. The recent economic recession provides a clear example. The level of emissions under the EU ETS fell by more than \(11 \%\) in 2009 and as a result companies were able to hoard around 250 million allowances in that single year alone. Over Phase II as a whole the recession is expected to add approximately 700 million allowances to the surplus.

With the banking arrangement in place, the ETS will remain vulnerable to demand shocks in the future. The waterbed-effect removes the ability for policymakers to steer the level of emissions in 2020 to a specific level.

\section*{2. The Linking Directive}

Another important source of oversupply is the Linking Directive. The Linking Directive allows companies to import extra allowances into the European emissions trading scheme. These allowances originate from two programs under the Kyoto protocol: the Clean Development Mechanism (CDM) and Joint Implementation (JI). Firms are allowed to use these allowances to offset their emissions on top of the allowances that they have already been granted under the scheme. The directive allows companies to raise the number of allowances in the scheme by a maximum of \(13.3 \%\).

In 2009 around one third of the potential of the Linking Directive was actually used. This resulted in an extra 83 million allowances that entered the EU ETS in that single year; adding approximately \(4 \%\) on top of the original cap. As the original cap of the EU ETS is set to decline starting in 2013, and the CDM and JI programs are further developed, the usage of the Linking Directive is likely to grow over time although the European Commission is planning to ban the usage of allowances from certain specific programs.

\section*{3. Leftovers from the New Entrants Reserve}

The New Entrants Reserve (NER) is the third significant source of oversupply. As the name implies, the allowances in the NER are reserved for new entrants into the EU ETS. For example, if a new power plant is built, allowances are assigned to this installation from the NER.

Five percent of the overall allowance cap is reserved for new entrants. If there are allowances left over in the reserve by the end of Phase II, member states are free to sell these on the market. As these allowances will not be covered by emissions, they will merely alleviate the pressure on incumbents who are able to buy them.

A considerable number of allowances is expected to be left over in the NER by the end of 2012. Estimates range from 180 million to 360 million allowances, depending on the actions of individual member states and the number of new entrants over the next two years. If member states decide to withdraw their surpluses instead of selling them on the market the problem could be eliminated. However, the surpluses represent an easy source of cash for governments with which they could fund other projects. Against a market price of \(€ 15\) per allowance, an excess of 180 million allowances would provide national governments with a total revenue of \(€ 2.7\) billion. The upshot is that national governments have an incentive not to act in the best interests of the trading scheme by selling off all remaining allowances in the reserve.

\section*{Phase III: lack of alignment further undermines the ETS}

Not only does this analysis indicate that there is hardly a basis for a strong and stable price incentive from the ETS, more importantly it shows that European carbon policy lacks internal consistency. The surplus is after all not the consequence of unforeseen circumstances but the direct result of elements that were deliberately introduced into the system, like the Banking Rule, the Linking Directive and the New Entrants Reserve. These are essentially political choices.

Unfortunately, the elements that undermine the effectiveness of the scheme are not limited to the second phase of the ETS. For example, an NER is also set up for the third phase (2013-2020). Although it is still too early to say whether there will be any allowances left over in the reserve by 2020, the European Commission has already reserved 300 million allowances as a means to fund projects related to innovative energy technology and carbon capture and storage (CCS). Hence, the European Commission is again alleviating the pressure on companies covered by the scheme by releasing more
allowances to finance other projects. Although support for the development of technologies like CCS is a necessity in order to reach long term emission reduction goals, the source of financing (allowances from the ETS) once again undermines the ETS Whereas a high demand for allowances is necessary to stimulate investments, continued oversupply until 2020 is a real possibility. With that in mind even the current price level of \(€ 15\) per tonne of \(\mathrm{CO}_{2}\) should be considered high, even in a few years' time.

\section*{Why a simple reduction of the cap is not the solution}

The way to solve the problem of large surpluses seems straightforward: reduce the number of issued allowances. Currently the European Commission plans to reduce the number of issued allowances over Phase 3 by 500 to 800 million allowances to correct for the effects of the recent economic recession. Such a move could increase the probability of achieving the emission reduction goal. However, in isolation, a reduction of allowances is still likely to be ineffective, because it would not fix any of the weaknesses of the ETS. The vulnerability to demand shocks, to the Linking Directive and to the NER is still there.

Policy measures should therefore first and foremost be focused on eliminating the weaknesses of the ETS. Policy alignment is the key here: eliminate the linking directive, stop using the NER as a financial instrument and eliminate any remaining allowances in the reserve. An agreement that would include these elements would constitute a major step forward. Unfortunately, such a far-reaching agreement is unlikely to be achieved given the number of parties sitting at the negotiation table.

\section*{Leave the market alone: why subsidies for wind energy are a bad idea}

But there is another problem as well. Even if we assume that the parties reach an agreement and do what is necessary to fix some of the main weaknesses of the current scheme, it might still not mean that the emission trading scheme is an effective and efficient method to reach the European emission reduction target.

The carbon market will only work efficiently (i.e. reach the target against the lowest possible costs) if the carbon price is reasonably stable, so companies can plan their investments accordingly. This will only happen if policy makers refrain from interfering with the market and limit their actions to providing a stable and coherent policy environment. In that case an emissions trading scheme could work.

In reality, the past five years have seen an unstable and unpredictable carbon price. In effect, the carbon market is not a real market, in which market forces determine the outcomes. Policy makers are constantly interfering and effectively trying to direct the market. If interfering meant that weaknesses were resolved, that would be a good thing. Yet, in practice, interference is often equal to either crisis management (e.g. repairing the damage of the recession) or providing substitutes for the market (e.g. by subsidizing certain forms of renewable energy).

The latter type of interference often goes unnoticed because the interference with the emissions trading scheme is indirect. For example, governments continually come up with new schemes and subsidies to stimulate the use of renewable energy sources and other low-carbon solutions. These subsidies improve the business cases for the companies involved. As a result they may invest in, for example, offshore wind energy sooner than they would have done otherwise. The problem is, however, that there already is a scheme in place that is intended to provide the same incentive to the industry: the ETS. If policy makers took the necessary steps to improve the functioning of the ETS, rising carbon prices would in time make the offshore wind park economically feasible by itself. A subsidy would not be needed and valuable tax payer money could be saved.

The argument, however, runs even deeper. Companies investing in offshore wind energy with the help of a subsidy do so earlier than they would otherwise do, thereby saving allowances that they would otherwise use to cover emissions. These allowances can now be sold on the market for other companies to use. The companies that buy the excess allowances can postpone their own investments. As a result, policies that speed up the carbon reduction effort in one country effectively reduce the pressure on firms in other ETS member states. On balance, the subsidy does not add anything to the overall reduction effort, but is merely a costly substitute for reductions that would have taken place anyway.

The subsidy for wind energy is just one example of how policies on a local or national (or even European) level work as a substitute to the ETS, with the effect of undermining the allowance price and efficiency of the scheme. Emission norms, regulation, taxes and any other measure that would 'speed up' the reduction efforts of industries covered by the scheme would have a similar effect.

To a certain extent policy makers are right when they stress the need for other incentives. The ETS is not providing the type of strong and stable incentive that should be expected from it, so it is understandable that they look for other methods. As long as the ETS is in place, however, policy makers should leave the market free to work, refrain from introducing other incentives and focus on alignment of the ETS to make the ETS an effective and efficient weapon in the fight against carbon emissions.

The alternative is to abolish the ETS altogether and switch to another incentive scheme. An example of an incentive scheme that could bypass all of the mentioned problems would be a progressively rising carbon tax. Although the government would have no direct control over emission levels and a tax is generally assumed to be less efficient than a market mechanism, it would provide stability, certainty and feed into the general expectation of rising carbon prices. As a result, it would create the type of investment climate that could kick start the investments needed to achieve the 2020 reduction target. The monitoring systems are already in place and allowances that have already been issued would not have to lose their value or function. Most importantly, however, 'allowance surplus' would become a thing of the past. Governments have to choose: either allow the market to do its work, or introduce a tax without control over the
emission levels. But interfering in the market with projects and measures that undermine the CO 2 price is not sustainable at any rate.

Arnold Mulder (1985) studied International Economics and Business and is now a PhD Candidate at the University of Groningen. His doctoral thesis focuses on the CCS value chain and incentive systems, with specific attention to the European Emissions Trading Scheme (EU ETS).

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\title{
Pa. chapter of Sierra Club calls for moratorium on new Marcellus drilling permits
}

\section*{September 13, 2010}

\section*{By Bryan Schutt}

To provide time for regulations to catch up to drilling operations, the Pennsylvania Chapter of the Sierra Club is pushing state lawmakers to enact a moratorium on new Marcellus Shale permits.

With thousands of permits already issued, State Conservation Chair Thomas Au said a pause on new permits would not stop activity. It would, however, slow down an industry that could leave the state crippled unless proper oversight is adopted, Au said. "There's a need to put a stopgap hoid on [new permits] until the state gets back together to pass legislation to protect safety and water," he said.

Although Gov. Edward Rendell has indicated that he will not sign a moratorium proposal, Au said the Sierra Club is intent on taking up the proposal with the new governor, who will be elected in November, as well as in the state's General Assembly.

But a moratorium is not the only demand of the club, which is unsatisfied with the lack of action on many legislative proposals. "The problem is, there are a number of bills that the state Legislature has failed to act on," Au said.

The Sierra Club, which has more than 23,000 members in Pennsylvania, supports new, tougher standards for well design and favors disclosure of hydraulic fracturing chemicals. The group also wants to ensure that no more drilling on state lands occurs, and it is opposed to "forced pooling." Additionally, the Sierra Club strongly favors a severance tax, which the Legislature has vowed to pass by Oct. 1.
"There are various proposals before the House on the severance tax, and whatever number the General Assembly comes up with ... we would like some portion to go to local governments, as well as to environmental conservation funds to deal with the long-term problems created by gas drilling," Au said.

In a Sept. 7 release, Dennis Winters, chairman of the Pennsylvania Chapter of the Sierra Club, said the costs of shale drilling in the state are already mounting. "Drilling pads and wastewater pits scar our landscapes. Heavy rigs damage our roads. Billions of gallons of water are withdrawn from our streams. Pipelines deface our natural areas. Operational errors contaminate our land and water and air," Winters said in a statement. "In Pennsylvania communities, people are being injured and killed from accidents; communities and towns are paying for additional services; and local emergency personnel are dealing with fires and toxic spills."

Jeff Schmidt, state chapter director for the Sierra Club, said those concerns highlight the need for action at the state level. "The legislative stalemate only hurts Pennsylvanians," he said. "Unless the Pennsylvania legislature acts now, Pennsylvania will suffer reckless environmental degradation; loss of drinking water; destruction of our precious state and national forests; increased air pollution; in-
creased exposure to toxic chemicals used in the drilling process and to the inherent toxic chemicals in natural gas."

Au said the Sierra Club still supports natural gas as a bridge fuel, but it wants extraction to be environmentally responsible. "These are not mutually exclusive objectives. I believe the Sierra Club always said that natural gas drilling has to be done safely," Au said. "There is plenty of natural gas available right now, so there's no need for us to rush out and drill every hole in the ground that we can drill. We need to take a step back and look at safety and environmental concerns." \(i\)

\section*{Drill Fee Proposed for Pennsylvania}

By Kris Maher

Pennsylvania Gov. Tom Corbett proposed a fee on natural-gas drilling of as much as \(\$ 160,000\) a well in an effort to find a middle ground between public support for assessing drillers in the booming Marcellus Shale basin and a campaign pledge not to impose taxes.

If passed by the state legislature, the recommendation would generate an estimated \(\$ 120\) million in the first year, most of which would be kept at the local level to help pay the cost to regulate drilling and to repair roads and bridges. Every other gas-drilling state already imposes a fee on wells or a tax on the value of gas that is extracted.

The governor's proposal also includes new requirements that would keep wells farther from streams and water wells. Environmentalists are concerned that the process of extracting shale gas, which involves pumping water and chemicals underground at high pressure, could contaminate surface and drinking water.
"As the number of wells grows, so will the revenue," said Mr. Corbett, a Republican, who linked the industry's growth to the state's economic future. "We are going to do this safely, and we're going to do it right, because energy equals jobs."

Under the governor's plan, about one-quarter of the well fees would go to state agencies like the Department of Environmental Protection and the rest to local communities. Some state lawmakers suggested they may push for higher fees or for more of the money to go to the state.

Democrat Jay Costa, the state Senate minority leader, said the governor's recommendations "fall woefully short." in terms of revenue and the amount that is going to the state. Some Republicans, who have a majority in both the Senate and House, are also pushing for more drilling revenue. GOP state Rep. Thomas Murt plans to introduce a bill Tuesday that includes a \(4.9 \%\) tax on the gross value of the gas at the wellhead, rather than a fee. His bill would dedicate \(29 \%\) of revenue to local governments, \(27 \%\) to state environmental programs and \(44 \%\) to state programs including drug rehabilitation.

Senate President Pro Tem Joe Scarnati said he hopes to pass a bill out of the Senate by the end of October.

The gas industry indicated it would push for legislation patterned after the governor's proposal. "The governor's plan...reminds us that the most significant and long-term benefits of clean-burning natural gas will be achieved only through competitive policies that allow the industry to flourish," said Kathryn Klaber, president of the Marcellus Shale Coalition, a trade group.

Sharon Ward, director of the Pennsylvania Budget and Policy Center, a liberal think tank, said: "Gov. Corbett has proposed a small, limited fee that fails to capture for Pennsylvanians the true worth of this vast natural resource, and fails to fully offset the short and long-term damage...by the industry."

Paul King, president of the Pennsylvania Environmental Council, called the governor's recommendations "a good start." Many of the state environmental rules related to drilling are nearly 30 years old.

A poll conducted last week by Quinnipiac University found that 64\% of Pennsylvania residents favor a new tax on natural-gas drillers in the Marcellus, while \(27 \%\) opposed a tax. The telephone survey of 1,370 registered voters conducted between Sept. 21-26 had a margin of error of \(2.7 \%\).

Other states, including Texas, Oklahoma, Arkansas and West Virginia, have taxes based on the value or volume of gas produced at a well site. Mr. Corbett, who was elected last year with strong gas-industry support, has said such a tax on drilling would turn away drillers and jobs.

\section*{EU Weighs Pullback on Cutting Emissions}

Commission's Energy Department Urges EU to Reconsider Energy Transition Absent a Broader Emissions Deal

By Alessandro Torello
BRUSSELS-The European Union is for the first time clearly questioning whether it should press ahead with long-term plans to cut greenhouse-gas emissions if other countries don't follow suit, in what could herald a significant policy shift for a region that has been at the forefront of advocating action to combat climate change.

In a document reviewed by The Wall Street Journal, the European Commission's energy department says the EU should consider whether the region should seek to switch its domestic energy base away from carbon-emitting sources in the absence of a global climate-change deal.
"If coordinated action on climate among the main global players fails to strengthen in the next few years, the question arises how far the EU should continue with an energy-system transition oriented to decarbonization," the commission says in a draft of its Energy Roadmap 2050. The document is an effort to look at how the EU energy and climate picture would look in 2050, according to different scenarios.

To be sure, the EU will stick to its end-of-decade greenhouse-gas reduction goals and the paper could change before it is published later this year. Even if it doesn't, the document would only be the opening salvo in what would be a fiercely contested debate. Many member states are strongly committed to slashing emissions, and the climate-change department within the Commission, the EU's executive, would likely resist any attempt to water down the EU's green credentials. There has been frequent friction between the energy and climate-change departments in Brussels.

The EU has long been recognized as a global leader in the fight to slash carbon emissions.

EU law mandates that the 27 countries cut their CO2 emissions by \(20 \%\) on average by 2020, compared with 1990 levels, and policy after that is being drawn with the assumption of bringing that cut to between \(80 \%\) and \(95 \%\) by 2050. The EU has lobbied hard to get a successor for the Kyoto treaty, the instrument that regulates carbon emissions internationally and expires next year.

A spokeswoman for Energy Commissioner Guenther Oettinger declined to comment on the content of the document.

The EU's doubts come ahead of a climate-change summit in Durban, South Africa, which is thought to be unlikely to deliver a significant global climate-change deal.

The current focus seems to be on salvaging the minimum commitments that have driven global action since the Copenhagen summit's failure in 2009.

In the past, the EU has rejected the idea that inaction by others was a reason to shelve its goals. But in light of the lack of international progress, there had been signs of a debate within the EU over how hard
the region should push on the issue. A meeting of EU environment ministers in Luxembourg last week agreed to commit internationally to new CO2-reduction targets only if there is a clear signal in Durban that other countries would follow suit.

The draft document says there are many benefits in pushing ahead with action to reduce carbon emissions. The commission says this will drive energy-infrastructure investments that will be needed anyway and reduce the region's external energy dependence.

Working on the assumption of a global deal, the document shows the commission urging member states to set out clear strategies for cutting emissions beyond 2020. The commission says the longer the wait, the higher the cost.
"Today there is an inadequate direction as to what should follow the 2020 agenda. This creates uncertainty among investors, citizens and governments," the document reads.

But the document is unambiguous about the risks if Europe acts alone.
"It has to be seen clearly that there are risks associated to unilateral EU action," the commission says in its draft. "There is a trade-off between climate-change policies and competitiveness. Europe cannot act alone in an effort to achieve global decarbonization," the paper says.

The commission is particularly worried that EU industry would lose competitiveness in the battle for global markets against companies from other parts of the world as its costs would be higher. EU companies would likely pay higher electricity prices because clean power production would be more expensive, while some would also have to pay for their own CO2 emissions, or face big investments to reduce them.

In a May 2010 study, the commission estimated that the \(20 \%\) CO2 cut by 2020 would cost \(€ 48\) billion a year ( \(\$ 66.3\) billion).

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| 2\% Escaiation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 |  | 3,816 | 4,811 | 3,969 | 4,049 | 4,130 | 4,212 | 4,296 | 4,382 | 4,470 | 4,559 |
| BR2 |  | 6,633 | 7,160 | 7,253 | 7,398 | 7,546 | 7,697 | 7,851 | 8,008 | 8,168 | 8,331 |
| BR3 |  | 15,885 | 20,876 | 14,904 | 15,202 | 15,506 | 15,816 | 16,132 | 16,455 | 16,784 | 17,120 |
| CR4 |  | 14,372 | 9,218 | 12,029 | 12,269 | 12,515 | 12,765 | 13,020 | 13,281 | 13,546 | 13,817 |
| CR5 |  | 11,842 | 9,889 | 12,791 | 13,047 | 13,308 | 13,574 | 13,845 | 14,122 | 14,405 | 14,693 |
| CR6 |  | 10,666 | 11,619 | 10,173 | 10,376 | 10,584 | 10,795 | 11,011 | 11,231 | 11,456 | 11,685 |
| GH1 |  | 17,829 | 19,141 | 17,966 | 18,325 | 18,691 | 19,065 | 19,447 | 19,835 | 20,232 | 20,637 |
| GH2 |  | 12,225 | 18,498 | 13,429 | 13,698 | 13,972 | 14,251 | 14,536 | 14,827 | 15,124 | 15,426 |
| GH3 |  | 17,961 | 13,501 | 12,475 | 12,724 | 12,979 | 13,238 | 13,503 | 13,773 | 14,049 | 14,330 |
| GH4 |  | 11,533 | 13,496 | 12,105 | 12,347 | 12,594 | 12,846 | 13,103 | 13,365 | 13,632 | 13,905 |
| GR3 |  | 4,270 | 5,792 | 4,360 | 4,447 | 4,536 | 4,627 | 4,719 | 4,813 | 4,910 | 5,008 |
| GR4 |  | 7,338 | 6,924 | 8,633 | 8,805 | 8,982 | 9,161 | 9,344 | 9,531 | 9,722 | 9,916 |
| MC1 |  | 11,892 | 17,333 | 12,669 | 12,923 | 13,181 | 13,445 | 13,714 | 13,988 | 14,268 | 14,553 |
| MC2 |  | 16,179 | 11,941 | 15,201 | 15,505 | 15,815 | 16,131 | 16,454 | 16,783 | 17,118 | 17,461 |
| MC3 |  | 18,313 | 14,238 | 17,221 | 17,566 | 17,917 | 18,275 | 18,641 | 19,014 | 19,394 | 19,782 |
| MC4 |  | 16,531 | 18,981 | 17,245 | 17,590 | 17,942 | 18,300 | 18,666 | 19,040 | 19,421 | 19,809 |
| TC1 |  | 17,205 | 15,170 | 17,403 | 17,751 | 18,106 | 18,468 | 18,837 | 19,214 | 19,598 | 19,990 |
| TY3 |  | 410 | 416 | 418 | 427 | 435 | 444 | 453 | 462 | 471 | 480 |



| Retirement Cost | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| All Units | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2\% Escalation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 | 4,651 | 4,744 | 4,838 | 4,935 | 5,034 | 5,135 | 5,237 | 5,342 | 5,449 | 5,558 | 5,669 |
| BR2 | 8,498 | 8,668 | 8,841 | 9,018 | 9,199 | 9,383 | 9,570 | 9,762 | 9,957 | 10,156 | 10,359 |
| BR3 | 17,462 | 17,811 | 18,167 | 18,531 | 18,901 | 19,279 | 19,665 | 20,058 | 20,460 | 20,869 | 21,286 |
| CR4 | 14,094 | 14,375 | 14,663 | 14,956 | 15,255 | 15,560 | 15,872 | 16,189 | 16,513 | 16,843 | 17,180 |
| CR5 | 14,987 | 15,286 | 15,592 | 15,904 | 16,222 | 16,546 | 16,877 | 17,215 | 17,559 | 17,910 | 18,269 |
| CR6 | 11,919 | 12,157 | 12,400 | 12,648 | 12,901 | 13,159 | 13,423 | 13,691 | 13,965 | 14,244 | 14,529 |
| GH1 | 21,050 | 21,471 | 21,900 | 22,338 | 22,785 | 23,240 | 23,705 | 24,179 | 24,663 | 25,156 | 25,659 |
| GH2 | 15,735 | 16,049 | 16,370 | 16,698 | 17,032 | 17,372 | 17,720 | 18,074 | 18,436 | 18,804 | 19,181 |
| GH3 | 14,616 | 14,909 | 15,207 | 15,511 | 15,821 | 16,138 | 16,460 | 16,790 | 17,125 | 17,468 | 17,817 |
| GH4 | 14,183 | 14,467 | 14,756 | 15,051 | 15,352 | 15,659 | 15,973 | 16,292 | 16,618 | 16,950 | 17,289 |
| GR3 | 5,108 | 5,210 | 5,314 | 5,421 | 5,529 | 5,640 | 5,753 | 5,868 | 5,985 | 6,105 | 6,227 |
| GR4 | 10,115 | 10,317 | 10,523 | 10,734 | 10,949 | 11,167 | 11,391 | 11,619 | 11,851 | 12,088 | 12,330 |
| MC1 | 14,844 | 15,141 | 15,444 | 15,753 | 16,068 | 16,389 | 16,717 | 17,051 | 17,392 | 17,740 | 18,095 |
| MC2 | 17,810 | 18,166 | 18,530 | 18,900 | 19,278 | 19,664 | 20,057 | 20,458 | 20,867 | 21,285 | 21,710 |
| MC3 | 20,177 | 20,581 | 20,993 | 21,412 | 21,841 | 22,278 | 22,723 | 23,178 | 23,641 | 24,114 | 24,596 |
| MC4 | 20,205 | 20,609 | 21,021 | 21,442 | 21,871 | 22,308 | 22,754 | 23,209 | 23,674 | 24,147 | 24,630 |
| TC1 | 20,390 | 20,798 | 21,214 | 21,638 | 22,071 | 22,512 | 22,962 | 23,422 | 23,890 | 24,368 | 24,855 |
| TY3 | 490 | 500 | 510 | 520 | 530 | 541 | 552 | 563 | 574 | 586 | 597 |


| Retirement Cost | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| All Units | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2\% Escalation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 | 4,651 | 4,744 | 4,838 | 4,935 | 5,034 | 5,135 | 5,237 | 5,342 | 5,449 | 5,558 | 5,669 |
| BR2 | 8,498 | 8,668 | 8,841 | 9,018 | 9,199 | 9,383 | 9,570 | 9,762 | 9,957 | 10,156 | 10,359 |
| BR3 | 17,462 | 17,811 | 18,167 | 18,531 | 18,901 | 19,279 | 19,665 | 20,058 | 20,460 | 20,869 | 21,286 |
| CR4 | 14,094 | 14,375 | 14,663 | 14,956 | 15,255 | 15,560 | 15,872 | 16,189 | 16,513 | 16,843 | 17,180 |
| CR5 | 14,987 | 15,286 | 15,592 | 15,904 | 16,222 | 16,546 | 16,877 | 17,215 | 17,559 | 17,910 | 18,269 |
| CR6 | 11,919 | 12,157 | 12,400 | 12,648 | 12,901 | 13,159 | 13,423 | 13,691 | 13,965 | 14,244 | 14,529 |
| GH1 | 21,050 | 21,471 | 21,900 | 22,338 | 22,785 | 23,240 | 23,705 | 24,179 | 24,663 | 25,156 | 25,659 |
| GH2 | 15,735 | 16,049 | 16,370 | 16,698 | 17,032 | 17,372 | 17,720 | 18,074 | 18,436 | 18,804 | 19,181 |
| GH3 | 14,616 | 14,909 | 15,207 | 15,511 | 15,821 | 16,138 | 16,460 | 16,790 | 17,125 | 17,468 | 17,817 |
| GH4 | 14,183 | 14,467 | 14,756 | 15,051 | 15,352 | 15,659 | 15,973 | 16,292 | 16,618 | 16,950 | 17,289 |
| GR3 | 5,108 | 5,210 | 5,314 | 5,421 | 5,529 | 5,640 | 5,753 | 5,868 | 5,985 | 6,105 | 6,227 |
| GR4 | 10,115 | 10,317 | 10,523 | 10,734 | 10,949 | 11,167 | 11,391 | 11,619 | 11,851 | 12,088 | 12,330 |
| MC1 | 14,844 | 15,141 | 15,444 | 15,753 | 16,068 | 16,389 | 16,717 | 17,051 | 17,392 | 17,740 | 18,095 |
| MC2 | 17,810 | 18,166 | 18,530 | 18,900 | 19,278 | 19,664 | 20,057 | 20,458 | 20,867 | 21,285 | 21,710 |
| MC3 | 20,177 | 20,581 | 20,993 | 21,412 | 21,841 | 22,278 | 22,723 | 23,178 | 23,641 | 24,114 | 24,596 |
| MC4 | 20,205 | 20,609 | 21,021 | 21,442 | 21,871 | 22,308 | 22,754 | 23,209 | 23,674 | 24,147 | 24,630 |
| TC1 | 20,390 | 20,798 | 21,214 | 21,638 | 22,071 | 22,512 | 22,962 | 23,422 | 23,890 | 24,368 | 24,855 |
| TY3 | 490 | 500 | 510 | 520 | 530 | 541 | 552 | 563 | 574 | 586 | 597 |


| Retirement Cost | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| All Units | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2\% Escalation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 | 4,651 | 4,744 | 4,838 | 4,935 | 5,034 | 5,135 | 5,237 | 5,342 | 5,449 | 5,558 | 5,669 |
| BR2 | 8,498 | 8,668 | 8,841 | 9,018 | 9,199 | 9,383 | 9,570 | 9,762 | 9,957 | 10,156 | 10,359 |
| BR3 | 17,462 | 17,811 | 18,167 | 18,531 | 18,901 | 19,279 | 19,665 | 20,058 | 20,460 | 20,869 | 21,286 |
| CR4 | 14,094 | 14,375 | 14,663 | 14,956 | 15,255 | 15,560 | 15,872 | 16,189 | 16,513 | 16,843 | 17,180 |
| CR5 | 14,987 | 15,286 | 15,592 | 15,904 | 16,222 | 16,546 | 16,877 | 17,215 | 17,559 | 17,910 | 18,269 |
| CR6 | 11,919 | 12,157 | 12,400 | 12,648 | 12,901 | 13,159 | 13,423 | 13,691 | 13,965 | 14,244 | 14,529 |
| GH1 | 21,050 | 21,471 | 21,900 | 22,338 | 22,785 | 23,240 | 23,705 | 24,179 | 24,663 | 25,156 | 25,659 |
| GH2 | 15,735 | 16,049 | 16,370 | 16,698 | 17,032 | 17,372 | 17,720 | 18,074 | 18,436 | 18,804 | 19,181 |
| GH3 | 14,616 | 14,909 | 15,207 | 15,511 | 15,821 | 16,138 | 16,460 | 16,790 | 17,125 | 17,468 | 17,817 |
| GH4 | 14,183 | 14,467 | 14,756 | 15,051 | 15,352 | 15,659 | 15,973 | 16,292 | 16,618 | 16,950 | 17,289 |
| GR3 | 5,108 | 5,210 | 5,314 | 5,421 | 5,529 | 5,640 | 5,753 | 5,868 | 5,985 | 6,105 | 6,227 |
| GR4 | 10,115 | 10,317 | 10,523 | 10,734 | 10,949 | 11,167 | 11,391 | 11,619 | 11,851 | 12,088 | 12,330 |
| MC1 | 14,844 | 15,141 | 15,444 | 15,753 | 16,068 | 16,389 | 16,717 | 17,051 | 17,392 | 17,740 | 18,095 |
| MC2 | 17,810 | 18,166 | 18,530 | 18,900 | 19,278 | 19,664 | 20,057 | 20,458 | 20,867 | 21,285 | 21,710 |
| MC3 | 20,177 | 20,581 | 20,993 | 21,412 | 21,841 | 22,278 | 22,723 | 23,178 | 23,641 | 24,114 | 24,596 |
| MC4 | 20,205 | 20,609 | 21,021 | 21,442 | 21,871 | 22,308 | 22,754 | 23,209 | 23,674 | 24,147 | 24,630 |
| TC1 | 20,390 | 20,798 | 21,214 | 21,638 | 22,071 | 22,512 | 22,962 | 23,422 | 23,890 | 24,368 | 24,855 |
| TY3 | 490 | 500 | 510 | 520 | 530 | 541 | 552 | 563 | 574 | 586 | 597 |


| Retirement Cost | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| All Units | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2\% Escalation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 | 4,651 | 4,744 | 4,838 | 4,935 | 5,034 | 5,135 | 5,237 | 5,342 | 5,449 | 5,558 | 5,669 |
| BR2 | 8,498 | 8,668 | 8,841 | 9,018 | 9,199 | 9,383 | 9,570 | 9,762 | 9,957 | 10,156 | 10,359 |
| BR3 | 17,462 | 17,811 | 18,167 | 18,531 | 18,901 | 19,279 | 19,665 | 20,058 | 20,460 | 20,869 | 21,286 |
| CR4 | 14,094 | 14,375 | 14,663 | 14,956 | 15,255 | 15,560 | 15,872 | 16,189 | 16,513 | 16,843 | 17,180 |
| CR5 | 14,987 | 15,286 | 15,592 | 15,904 | 16,222 | 16,546 | 16,877 | 17,215 | 17,559 | 17,910 | 18,269 |
| CR6 | 11,919 | 12,157 | 12,400 | 12,648 | 12,901 | 13,159 | 13,423 | 13,691 | 13,965 | 14,244 | 14,529 |
| GH1 | 21,050 | 21,471 | 21,900 | 22,338 | 22,785 | 23,240 | 23,705 | 24,179 | 24,663 | 25,156 | 25,659 |
| GH2 | 15,735 | 16,049 | 16,370 | 16,698 | 17,032 | 17,372 | 17,720 | 18,074 | 18,436 | 18,804 | 19,181 |
| GH3 | 14,616 | 14,909 | 15,207 | 15,511 | 15,821 | 16,138 | 16,460 | 16,790 | 17,125 | 17,468 | 17,817 |
| GH4 | 14,183 | 14,467 | 14,756 | 15,051 | 15,352 | 15,659 | 15,973 | 16,292 | 16,618 | 16,950 | 17,289 |
| GR3 | 5,108 | 5,210 | 5,314 | 5,421 | 5,529 | 5,640 | 5,753 | 5,868 | 5,985 | 6,105 | 6,227 |
| GR4 | 10,115 | 10,317 | 10,523 | 10,734 | 10,949 | 11,167 | 11,391 | 11,619 | 11,851 | 12,088 | 12,330 |
| MC1 | 14,844 | 15,141 | 15,444 | 15,753 | 16,068 | 16,389 | 16,717 | 17,051 | 17,392 | 17,740 | 18,095 |
| MC2 | 17,810 | 18,166 | 18,530 | 18,900 | 19,278 | 19,664 | 20,057 | 20,458 | 20,867 | 21,285 | 21,710 |
| MC3 | 20,177 | 20,581 | 20,993 | 21,412 | 21,841 | 22,278 | 22,723 | 23,178 | 23,641 | 24,114 | 24,596 |
| MC4 | 20,205 | 20,609 | 21,021 | 21,442 | 21,871 | 22,308 | 22,754 | 23,209 | 23,674 | 24,147 | 24,630 |
| TC1 | 20,390 | 20,798 | 21,214 | 21,638 | 22,071 | 22,512 | 22,962 | 23,422 | 23,890 | 24,368 | 24,855 |
| TY3 | 490 | 500 | 510 | 520 | 530 | 541 | 552 | 563 | 574 | 586 | 597 |


| Retirement Cost | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2\% Escalation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 | 4,651 | 4,744 | 4,838 | 4,935 | 5,034 | 5,135 | 5,237 | 5,342 | 5,449 | 5,558 | 5,669 |
| BR2 | 8,498 | 8,668 | 8,841 | 9,018 | 9,199 | 9,383 | 9,570 | 9,762 | 9,957 | 10,156 | 10,359 |
| BR3 | 17,462 | 17,811 | 18,167 | 18,531 | 18,901 | 19,279 | 19,665 | 20,058 | 20,460 | 20,869 | 21,286 |
| CR4 | 14,094 | 14,375 | 14,663 | 14,956 | 15,255 | 15,560 | 15,872 | 16,189 | 16,513 | 16,843 | 17,180 |
| CR5 | 14,987 | 15,286 | 15,592 | 15,904 | 16,222 | 16,546 | 16,877 | 17,215 | 17,559 | 17,910 | 18,269 |
| CR6 | 11,919 | 12,157 | 12,400 | 12,648 | 12,901 | 13,159 | 13,423 | 13,691 | 13,965 | 14,244 | 14,529 |
| GH1 | 21,050 | 21,471 | 21,900 | 22,338 | 22,785 | 23,240 | 23,705 | 24,179 | 24,663 | 25,156 | 25,659 |
| GH2 | 15,735 | 16,049 | 16,370 | 16,698 | 17,032 | 17,372 | 17,720 | 18,074 | 18,436 | 18,804 | 19,181 |
| GH3 | 14,616 | 14,909 | 15,207 | 15,511 | 15,821 | 16,138 | 16,460 | 16,790 | 17,125 | 17,468 | 17,817 |
| GH4 | 14,183 | 14,467 | 14,756 | 15,051 | 15,352 | 15,659 | 15,973 | 16,292 | 16,618 | 16,950 | 17,289 |
| GR3 | 5,108 | 5,210 | 5,314 | 5,421 | 5,529 | 5,640 | 5,753 | 5,868 | 5,985 | 6,105 | 6,227 |
| GR4 | 10,115 | 10,317 | 10,523 | 10,734 | 10,949 | 11,167 | 11,391 | 11,619 | 11,851 | 12,088 | 12,330 |
| MC1 | 14,844 | 15,141 | 15,444 | 15,753 | 16,068 | 16,389 | 16,717 | 17,051 | 17,392 | 17,740 | 18,095 |
| MC2 | 17,810 | 18,166 | 18,530 | 18,900 | 19,278 | 19,664 | 20,057 | 20,458 | 20,867 | 21,285 | 21,710 |
| MC3 | 20,177 | 20,581 | 20,993 | 21,412 | 21,841 | 22,278 | 22,723 | 23,178 | 23,641 | 24,114 | 24,596 |
| MC4 | 20,205 | 20,609 | 21,021 | 21,442 | 21,871 | 22,308 | 22,754 | 23,209 | 23,674 | 24,147 | 24,630 |
| TC1 | 20,390 | 20,798 | 21,214 | 21,638 | 22,071 | 22,512 | 22,962 | 23,422 | 23,890 | 24,368 | 24,855 |
| TY3 | 490 | 500 | 510 | 520 | 530 | 541 | 552 | 563 | 574 | 586 | 597 |


| Retirement Cost | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| All Units | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2\% Escalation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 | 4,651 | 4,744 | 4,838 | 4,935 | 5,034 | 5,135 | 5,237 | 5,342 | 5,449 | 5,558 | 5,669 |
| BR2 | 8,498 | 8,668 | 8,841 | 9,018 | 9,199 | 9,383 | 9,570 | 9,762 | 9,957 | 10,156 | 10,359 |
| BR3 | 17,462 | 17,811 | 18,167 | 18,531 | 18,901 | 19,279 | 19,665 | 20,058 | 20,460 | 20,869 | 21,286 |
| CR4 | 14,094 | 14,375 | 14,663 | 14,956 | 15,255 | 15,560 | 15,872 | 16,189 | 16,513 | 16,843 | 17,180 |
| CR5 | 14,987 | 15,286 | 15,592 | 15,904 | 16,222 | 16,546 | 16,877 | 17,215 | 17,559 | 17,910 | 18,269 |
| CR6 | 11,919 | 12,157 | 12,400 | 12,648 | 12,901 | 13,159 | 13,423 | 13,691 | 13,965 | 14,244 | 14,529 |
| GH1 | 21,050 | 21,471 | 21,900 | 22,338 | 22,785 | 23,240 | 23,705 | 24,179 | 24,663 | 25,156 | 25,659 |
| GH2 | 15,735 | 16,049 | 16,370 | 16,698 | 17,032 | 17,372 | 17,720 | 18,074 | 18,436 | 18,804 | 19,181 |
| GH3 | 14,616 | 14,909 | 15,207 | 15,511 | 15,821 | 16,138 | 16,460 | 16,790 | 17,125 | 17,468 | 17,817 |
| GH4 | 14,183 | 14,467 | 14,756 | 15,051 | 15,352 | 15,659 | 15,973 | 16,292 | 16,618 | 16,950 | 17,289 |
| GR3 | 5,108 | 5,210 | 5,314 | 5,421 | 5,529 | 5,640 | 5,753 | 5,868 | 5,985 | 6,105 | 6,227 |
| GR4 | 10,115 | 10,317 | 10,523 | 10,734 | 10,949 | 11,167 | 11,391 | 11,619 | 11,851 | 12,088 | 12,330 |
| MC1 | 14,844 | 15,141 | 15,444 | 15,753 | 16,068 | 16,389 | 16,717 | 17,051 | 17,392 | 17,740 | 18,095 |
| MC2 | 17,810 | 18,166 | 18,530 | 18,900 | 19,278 | 19,664 | 20,057 | 20,458 | 20,867 | 21,285 | 21,710 |
| MC3 | 20,177 | 20,581 | 20,993 | 21,412 | 21,841 | 22,278 | 22,723 | 23,178 | 23,641 | 24,114 | 24,596 |
| MC4 | 20,205 | 20,609 | 21,021 | 21,442 | 21,871 | 22,308 | 22,754 | 23,209 | 23,674 | 24,147 | 24,630 |
| TC1 | 20,390 | 20,798 | 21,214 | 21,638 | 22,071 | 22,512 | 22,962 | 23,422 | 23,890 | 24,368 | 24,855 |
| TY3 | 490 | 500 | 510 | 520 | 530 | 541 | 552 | 563 | 574 | 586 | 597 |


| Retirement Cost | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| All Units | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2\% Escalation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 | 4,651 | 4,744 | 4,838 | 4,935 | 5,034 | 5,135 | 5,237 | 5,342 | 5,449 | 5,558 | 5,669 |
| BR2 | 8,498 | 8,668 | 8,841 | 9,018 | 9,199 | 9,383 | 9,570 | 9,762 | 9,957 | 10,156 | 10,359 |
| BR3 | 17,462 | 17,811 | 18,167 | 18,531 | 18,901 | 19,279 | 19,665 | 20,058 | 20,460 | 20,869 | 21,286 |
| CR4 | 14,094 | 14,375 | 14,663 | 14,956 | 15,255 | 15,560 | 15,872 | 16,189 | 16,513 | 16,843 | 17,180 |
| CR5 | 14,987 | 15,286 | 15,592 | 15,904 | 16,222 | 16,546 | 16,877 | 17,215 | 17,559 | 17,910 | 18,269 |
| CR6 | 11,919 | 12,157 | 12,400 | 12,648 | 12,901 | 13,159 | 13,423 | 13,691 | 13,965 | 14,244 | 14,529 |
| GH1 | 21,050 | 21,471 | 21,900 | 22,338 | 22,785 | 23,240 | 23,705 | 24,179 | 24,663 | 25,156 | 25,659 |
| GH2 | 15,735 | 16,049 | 16,370 | 16,698 | 17,032 | 17,372 | 17,720 | 18,074 | 18,436 | 18,804 | 19,181 |
| GH3 | 14,616 | 14,909 | 15,207 | 15,511 | 15,821 | 16,138 | 16,460 | 16,790 | 17,125 | 17,468 | 17,817 |
| GH4 | 14,183 | 14,467 | 14,756 | 15,051 | 15,352 | 15,659 | 15,973 | 16,292 | 16,618 | 16,950 | 17,289 |
| GR3 | 5,108 | 5,210 | 5,314 | 5,421 | 5,529 | 5,640 | 5,753 | 5,868 | 5,985 | 6,105 | 6,227 |
| GR4 | 10,115 | 10,317 | 10,523 | 10,734 | 10,949 | 11,167 | 11,391 | 11,619 | 11,851 | 12,088 | 12,330 |
| MC1 | 14,844 | 15,141 | 15,444 | 15,753 | 16,068 | 16,389 | 16,717 | 17,051 | 17,392 | 17,740 | 18,095 |
| MC2 | 17,810 | 18,166 | 18,530 | 18,900 | 19,278 | 19,664 | 20,057 | 20,458 | 20,867 | 21,285 | 21,710 |
| MC3 | 20,177 | 20,581 | 20,993 | 21,412 | 21,841 | 22,278 | 22,723 | 23,178 | 23,641 | 24,114 | 24,596 |
| MC4 | 20,205 | 20,609 | 21,021 | 21,442 | 21,871 | 22,308 | 22,754 | 23,209 | 23,674 | 24,147 | 24,630 |
| TC1 | 20,390 | 20,798 | 21,214 | 21,638 | 22,071 | 22,512 | 22,962 | 23,422 | 23,890 | 24,368 | 24,855 |
| TY3 | 490 | 500 | 510 | 520 | 530 | 541 | 552 | 563 | 574 | 586 | 597 |


| Retirement Cost | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| All Units | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2\% Escalation Rate |  |  |  |  |  |  |  |  |  |  |  |
| Unit Costs (\$000) |  |  |  |  |  |  |  |  |  |  |  |
| BR1 | 4,651 | 4,744 | 4,838 | 4,935 | 5,034 | 5,135 | 5,237 | 5,342 | 5,449 | 5,558 | 5,669 |
| BR2 | 8,498 | 8,668 | 8,841 | 9,018 | 9,199 | 9,383 | 9,570 | 9,762 | 9,957 | 10,156 | 10,359 |
| BR3 | 17,462 | 17,811 | 18,167 | 18,531 | 18,901 | 19,279 | 19,665 | 20,058 | 20,460 | 20,869 | 21,286 |
| CR4 | 14,094 | 14,375 | 14,663 | 14,956 | 15,255 | 15,560 | 15,872 | 16,189 | 16,513 | 16,843 | 17,180 |
| CR5 | 14,987 | 15,286 | 15,592 | 15,904 | 16,222 | 16,546 | 16,877 | 17,215 | 17,559 | 17,910 | 18,269 |
| CR6 | 11,919 | 12,157 | 12,400 | 12,648 | 12,901 | 13,159 | 13,423 | 13,691 | 13,965 | 14,244 | 14,529 |
| GH1 | 21,050 | 21,471 | 21,900 | 22,338 | 22,785 | 23,240 | 23,705 | 24,179 | 24,663 | 25,156 | 25,659 |
| GH2 | 15,735 | 16,049 | 16,370 | 16,698 | 17,032 | 17,372 | 17,720 | 18,074 | 18,436 | 18,804 | 19,181 |
| GH3 | 14,616 | 14,909 | 15,207 | 15,511 | 15,821 | 16,138 | 16,460 | 16,790 | 17,125 | 17,468 | 17,817 |
| GH4 | 14,183 | 14,467 | 14,756 | 15,051 | 15,352 | 15,659 | 15,973 | 16,292 | 16,618 | 16,950 | 17,289 |
| GR3 | 5,108 | 5,210 | 5,314 | 5,421 | 5,529 | 5,640 | 5,753 | 5,868 | 5,985 | 6,105 | 6,227 |
| GR4 | 10,115 | 10,317 | 10,523 | 10,734 | 10,949 | 11,167 | 11,391 | 11,619 | 11,851 | 12,088 | 12,330 |
| MC1 | 14,844 | 15,141 | 15,444 | 15,753 | 16,068 | 16,389 | 16,717 | 17,051 | 17,392 | 17,740 | 18,095 |
| MC2 | 17,810 | 18,166 | 18,530 | 18,900 | 19,278 | 19,664 | 20,057 | 20,458 | 20,867 | 21,285 | 21,710 |
| MC3 | 20,177 | 20,581 | 20,993 | 21,412 | 21,841 | 22,278 | 22,723 | 23,178 | 23,641 | 24,114 | 24,596 |
| MC4 | 20,205 | 20,609 | 21,021 | 21,442 | 21,871 | 22,308 | 22,754 | 23,209 | 23,674 | 24,147 | 24,630 |
| TC1 | 20,390 | 20,798 | 21,214 | 21,638 | 22,071 | 22,512 | 22,962 | 23,422 | 23,890 | 24,368 | 24,855 |
| TY3 | 490 | 500 | 510 | 520 | 530 | 541 | 552 | 563 | 574 | 586 | 597 |

Unit Costs (\$000)











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2010
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|  | Fixed O\&M |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | Month | Year Equipment | \$/yr | $\underline{2023}$ | 2024 | $\underline{2025}$ | 2026 | 2027 | 2028 | $\underline{2029}$ | 2030 | 2031 | $\underline{2032}$ | 2033 | 2034 |
| GR | GR3 | 1 | 2016 CDS-FF | 3,322,000 | 4,297,361 | 4,383,308 | 4,470,975 | 4,560,394 | 4,651,602 | 4,744,634 | 4,839,527 | 4,936,317 | 5,035,044 | 5,135,744 | 5,238,459 | 5,343,229 |
| GR | GR3 | 1 | 2016 PAC Injection | 141,000 | 182,399 | 186,047 | 189,767 | 193,563 | 197,434 | 201,383 | 205.410 | 209,519 | 213,709 | 217,983 | 222,343 | 226.790 |
| GR | GR4 | 1 | 2016 SCR | 0 | 0 | 0 | 0 | 0 | 0 | 0 | , | 0 | 0 | 0 | 0 | 0 |
| GR | GR4 | 1 | 2016 CDS-FF | 4,309,000 | 5,574,151 | 5,685,634 | 5,799,347 | 5,915,334 | 6,033,640 | 6,154,313 | 6,277,399 | 6,402,947 | 6,531,006 | 6,661,626 | 6,794,859 | 6,930,756 |
| GR | GR4 | 1 | 2016 PAC Injection | 150,000 | 194,041 | 197,922 | 201,880 | 205,918 | 210,036 | 214,237 | 218,522 | 222,892 | 227,350 | 231,897 | 236,535 | 241,266 |








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| Station | Unit | Capacity | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 |
| BR | BR1 | 101 | 0 | 0 | 0 | 553 | 743 | 703 | 668 | 635 | 606 | 577 | 548 | 519 | 491 | 462 | 433 | 413 | 40 | 393 |
| BR | BR2 | 167 | 0 | 0 | 0 | 915 | 1.228 | ${ }^{1.163}$ | 1,104 | 1.050 | 1,002 | 954 | 907 | 859 | 811 | 764 | 716 | 684 | 666 | 649 |
| BR | BR3 | 416 | 0 | 0 | 0 | 2.279 | 3.060 | 2.897 | 2.749 | 2,616 | 2,496 | 2,377 | 2.258 | 2.140 | 2.021 | 1,902 | 1.784 | 1,703 | 1,660 | 1,617 |
| CR | CR4 | 155 | 0 | 0 | 0 | 980 | 1.582 | 1,494 | 1.413 | 1,339 | 1,269 | 1,201 | 1.132 | 1,064 | 996 | 927 | 859 | 806 | 770 | 735 |
| CR | CR5 | 168 | 0 | 0 | 0 | 1,062 | 1.715 | 1,619 | 1.532 | 1,451 | 1,376 | 1,302 | 1.227 | 1,153 | 1,079 | 1,005 | 931 | 874 | 835 | 796 |
| CR | CR6 | 240 | 0 | 0 | 0 | 1.518 | 2.449 | 2.313 | 2.188 | 2,073 | 1.965 | 1.860 | 1,754 | 1,697 | 1.541 | 1,435 | 1.329 | 1.249 | 1,193 | 1.137 |
| GH | GH1 | 475 | 0 | 0 | 0 | 1,462 | 1,954 | 1,856 | 1,767 | 1,686 | 1,611 | 1.540 | 1.468 | 1.397 | 1.325 | 1.254 | 1,183 | 1.111 | 1,062 | 1.035 |
| GH | GH2 | 484 | 0 | 0 | 0 | 1,489 | 1.991 | 1,891 | 1.800 | 1.718 | 1.642 | 1.569 | 1.496 | 1,423 | 1.350 | 1,278 | 1,205 | 1,132 | 1,082 | 1.055 |
| GH | GH3 | 480 | 0 | 0 | 0 | 1,477 | 1,975 | 1.876 | 1.786 | 1,703 | 1,628 | 1,556 | 1,484 | 1.411 | 1,339 | 1,267 | 1,195 | 1,123 | 1.073 | 1.046 |
| GH | GH4 | 479 | 0 | 0 | 0 | 1.474 | 1.971 | 1,872 | 1,782 | 1.700 | 1.625 | 1,553 | 1.481 | 1,409 | 1,337 | 1.265 | 1,193 | 1,121 | 1.071 | 1.044 |
| GR | GR3 | 68 | 0 | 0 | 0 | 586 | 837 | 792 | 751 | 713 | 679 | 645 | 611 | 577 | 544 | 510 | 476 | 452 | 438 | ${ }^{423}$ |
| GR | GR4 | 95 | 0 | 0 | 0 | 819 | 1.169 | 1,106 | 1,049 | 996 | 948 | 901 | 854 | 807 | 759 | 712 | 665 | 631 | 611 | 591 |
| MC | MC1 | 303 | 0 | 0 | 0 | 1,215 | 1.774 | 1,682 | 1.598 | 1,521 | 1,449 | 1,380 | 1.311 | 1,242 | 1,173 | 1,103 | 1,034 | 965 | 915 | 882 |
| MC | MC2 | 301 | 0 | 0 | 0 | 1,207 | 1.762 | 1,671 | 1,588 | 1.511 | 1.440 | 1,371 | 1.302 | 1,234 | 1,165 | 1.096 | 1.027 | 959 | 908 | 877 |
| MC | MC3 | 391 | 0 | 0 | 0 | 1,568 | 2,289 | 2.171 | 2,063 | 1,963 | 1,870 | 1,781 | 1,692 | 1,602 | 1.513 | 1.424 | 1,335 | 1,245 | 1,180 | 1.139 |
| MC | MC4 | 477 | 0 | 0 | 0 | 1.913 | 2,792 | 2,648 | 2.516 | 2.394 | 2,281 | 2.172 | 2.064 | 1,955 | 1.846 | 1.737 | 1,628 | 1,519 | 1.440 | 1,389 |
| TC | TC1 | 383 | 0 | 0 | 0 | 770 | 1.008 | 958 | 912 | 871 | 833 | 797 | 760 | 724 | 688 | 652 | 616 | 579 | 555 | 542 |
| Tc | TC2 | 549 | 0 | 0 | 0 | 1,104 | 1,445 | 1,373 | 1,307 | 1,248 | 1.194 | 1,142 | 1.090 | 1,038 | 986 | 934 | 882 | 830 | 795 | 777 |
| TV | T/3 | 71 | 0 | 0 | 0 | 586 | 837 | 792 | 751 | 713 | 679 | 645 | 611 | 577 | 544 | 510 | 476 | 452 | 438 | 423 |
|  |  | brwater | 0 | 0 | 0 | 3,747 | 5,032 | 4.763 | 4.521 | 4.302 | 4,104 | 3.908 | 3,713 | 3.518 | 3,323 | 3.128 | 2,933 | 2,800 | 2.729 | 2,659 |
|  |  | CRWater | 0 | 0 | 0 | 3,560 | 5.746 | 5.427 | 5,134 | 4,863 | 4,611 | 4,362 | 4,113 | 3,865 | 3,616 | 3,367 | 3.118 | 2,929 | 2.798 | 2,668 |
|  |  | mCWATER | 0 | 0 | 0 | 5,902 | 8,617 | 8,173 | 7.765 | 7,389 | 7.040 | 5,704 | 6,368 | 6,032 | 5.696 | 5,361 | 5.025 | 4,689 | 4,443 | 4,287 |
|  |  | TCWATER | 0 | 0 | 0 | 1,874 | 2,453 | 2,331 | 2,220 | 2,119 | 2,026 | 1.938 | 1,850 | 1,762 | 1.674 | 1,586 | 1,498 | 1.410 | 1,350 | 1.319 |
|  |  | ghwater | 0 | 0 | 0 | 5,902 | 7,892 | 7,495 | 7,135 | 6.806 | 6.505 | 6,217 | 5,928 | 5,640 | 5.352 | 5.063 | 4,775 | 4,487 | 4,288 | 4,180 |
|  |  | grwater | 0 | 0 | 0 | 1,405 | 2,006 | 1,898 | 1.799 | 1.709 | 1,627 | 1.546 | 1.465 | 1,384 | 1.303 | 1,222 | 1,141 | 1,083 | 1,049 | 1,015 |


| Station | Unit | Capacity | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 | 2036 | 2037 |  |  |  |  |  |  |  |  |  |
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| ${ }^{\text {BR }}$ | BR1 | 101 | 382 | 372 | 361 | 351 | 340 | 330 | 320 | 309 309 | 299 | $\begin{array}{r}2038 \\ 288 \\ \hline\end{array}$ | 2039 | 2040 | ${ }_{2}^{2041}$ | 2042 | 2043 | 2044 | 2045 | 2046 |
| ${ }^{\text {BR }}$ | ${ }^{\text {BR2 }}$ | 167 | 632 | 615 | 597 | 580 | 563 | 546 | 528 | 309 511 | 299 | 288 | ${ }_{459}^{278}$ | 267 | 257 | 247 | ${ }^{236}$ | ${ }^{226}$ | 215 | 205 |
| ${ }^{\text {br }}$ | BR3 | 416 | 1.574 | 1.531 | 1,488 | 1,445 | 1,402 |  |  |  |  |  |  | 442 | 425 | 408 | 390 | 373 | 356 | 339 |
| CR | CR4 | 155 | 699 | 663 | 627 | 591 | 1,0 | 1.0 | 1,36 | 1,273 | 1.230 | 1.187 | 1,144 | 1,101 | 1,058 | 1.016 | 973 | 930 | 887 | 844 |
| CR | CR5 | 168 | 757 | 718 | 679 | 640 | 0 | 0 | 0 | 0 |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CR | CRG | 240 | 1,082 | 1.026 | 970 | 915 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | $\bigcirc$ | 0 | 0 |
| ${ }^{\text {GH }}$ | GHI | 475 | 1.008 | 982 | 955 | 928 | 901 | 875 | 848 | 821 | 794 | 767 | 741 | 714 | 687 | ${ }^{\circ}$ | $\stackrel{0}{634}$ | $\bigcirc$ | 0 | 0 |
| GH | GH2 | 484 | 1,028 | 1,000 | 973 | 946 | 918 | 891 | 864 | 837 | 809 | 782 | 755 | ${ }_{727}$ | ${ }_{700}^{68}$ | 660 | 634 | 607 | 80 | 3 |
| ${ }^{\text {GH }}$ | ¢H3 | 480 | 1,019 | 992 | 965 | 938 | 911 | 884 | 857 | 830 | 803 | 776 | 748 | 721 | 694 | 667 | ${ }^{646}$ | ${ }_{6}^{618}$ | 591 | 564 |
| $\mathrm{GH}^{\text {d }}$ | GH4 | 479 | 1,017 | 990 | 963 | 936 | 909 | 882 | 855 | 828 | 801 | 774 | 747 | 720 | 693 | 666 | ${ }_{6}^{640}$ | ${ }^{613}$ | 586 | 559 |
| GR | GR3 | 68 | 409 | 395 | 380 | 366 | 352 | 337 | 323 | 309 | 294 | 280 | 266 | 51 | 63 |  |  | 612 | 585 | 558 |
| GR | 684 | 95 | 571 | 551 | 531 | 511 | 491 | 471 | 451 | 431 | 411 | 391 | 371 | 351 | ${ }_{3}^{237}$ | 0 | 0 | 0 | 0 | 0 |
| MC | MC1 | 303 | 850 | 818 | 786 | 754 | 722 | 690 | 658 | 626 | 594 | 562 | 530 | ${ }^{351}$ | ${ }^{31}$ | 0 | - | 0 | 0 | $\bigcirc$ |
| mC | MC2 | 301 | 845 | 813 | 781 | 749 | 717 | 686 | 654 | 622 | 590 | 558 | 526 | 0 |  |  | 0 | 0 | 0 | 0 |
| MC | MC3 | 391 | 1,097 | 1,056 | 1,015 | 973 | 932 | 891 | 849 | 808 | 76 | 725 | 684 | 0 | 0 | 0 |  | 0 | 0 | 0 |
| MC | MC4 | 477 | 1,339 | 1,288 | 1,238 | 1,187 | 1,137 | 1,086 | 1,036 | 986 | 935 | 885 | 834 | 0 | 0 | 0 | 0 | 0 | 0 |  |
| TC | TC1 | 383 549 | 529 759 | 517 | ${ }_{7} 523$ | 491 | ${ }^{479}$ | 466 | 453 | ${ }^{441}$ | 428 | 415 | 403 | 0 | 377 | 364 | 352 | 339 | 326 | 314 |
| TY | TY3 | 71 | 409 | 395 | 380 | 366 |  |  | 650 323 | ${ }_{309}^{632}$ | ${ }_{213} 6$ | 595 | 577 | 559 | 541 | 522 | 504 | 486 | 468 | 450 |
|  |  |  |  |  |  |  |  | 337 | 323 | 309 | 294 | 280 | 266 | 251 | 237 | 0 | 0 | 0 | 0 | 0 |
|  |  | brwater | 2,588 | 2.517 | 2.447 | 2.376 | 2,305 | 2,235 | 2,164 | 2,094 | 2.023 |  | 1.882 | 1.811 | 1740 |  |  |  |  |  |
|  |  | crwater | 2,537 | 2.407 | 2,277 | 2,146 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 | 0 | 0 | 1,599 | 1.529 | 1,458 | 7 |
|  |  | mCwater | 4.131 | 3,976 | 3.820 | 3,664 | 3.508 | 3,353 | 3,197 | 3.041 | 2.886 | 2,730 | 2.574 | 0 | 0 |  |  | 0 | $\bigcirc$ | 0 |
|  |  | tcwater | 1,288 | 1.258 | 1,227 | 1,196 | 1,165 | 1.134 | 1,103 | 1,072 | 1,041 | 1.010 | 979 | 949 | 918 | 87 | 5 | 0 | 0 | 0 |
|  |  | GHWATER | 4,072 | 3,964 | 3.856 | 3.748 | 3.640 | 3.531 | 3,423 | 3.315 | 3,207 | 3,099 | 2,991 | 2.883 | 779 | 886 | 858 | 825 | 794 | 763 |
|  |  | grwater | 980 | 946 | 912 | 87 | 843 | 809 | 774 | 740 | 706 | 671 | 637 | 603 | 568 | 0 | 2.58 | 2,450 | 2,342 | 2,234 |


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| No Retirements | 2,987,8 | 18 | 3,203,297 | 3,290,340 | 3,297,676 | 3,356.737 | 3,480,390 | 3,589,844 | 3.666,273 | 3,703,679 | 3,761,291 | 3.823,836 | 3,814,175 | 3,932.779 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Retire TY | 2.982,627 | 3.126,986 | 3,232,640 | 3.320,644 | 3,322,437 | 3,371,484 | 3,451,256 | 3,548,538 | 3.683,44 | 3,721,962 | 3,772.108 | 3,804 | 3.801,261 |  |
| Retire TY and GR3 | 3,005,704 | 3,085,744 | 3,133,701 | 3,253,475 | 3,327,262 | 3,447,690 | 3,528.144 | 3.570,841 | 3,644, | 3,679,430 | 3.727,4 | 3,777,51 | 3,796, |  |
| Retire TY GR3 and BR3 | 3.106,085 | 3,183,867 | 3,223,805 | 3.322,270 | 3,410,412 | 3.536,96 | 3,598,863 | 3,651,003 | 3,730 | 3,769,082 | 3.824.484 |  |  |  |
| Retire TY GR3 and CR4 | 3,032,856 | 3,114,122 | 3,15 | 3.249,120 | 3,319,956 | 3,423,237 | 3,578,812 | 3,629,889 | 3,708.73 | 3.734,546 | 3,780,069 | 3,815.429 | 3,807.285 | 3,930,553 |
| Retire TY GR3 CR4 and CR6 | 3.061.307 | 3.141.689 | 3,185,904 | 3,278,394 | 3,374,325 | 3,508,598 | 3,505,774 | 3.649.79 | 3,728,35 | 3,770,023 | 3,816,87 | 3,856,685 | 3.892,224 | 4,003,088 |
| Retire TY GR3 CR4 CR6 and 8R | 3,062,027 | 3,159,031 | 3,266,583 | 3,429,527 | 3,439,106 | 3,500,717 | 3,504,957 | 3,649,683 | 3,746.282 | 3,825,319 | 3,871,298 | 3,933,832 | 3,932,482 | 4,058,677 |
| Retire TY GR3 and CR | 3,051,132 | 3,141,549 | 3,222,890 | 3.391,323 | 3,404,135 | 3,468,989 | 3,577,55 | 3,676,5 | 3,814,243 | 3,847,400 | 3,902,64 | 3,920,448 | 3,931,460 | 4,045,348 |
| Retire TY GR3 CR and GH3 | 3,194,581 | 3,275,265 | 3,317.229 | 3,431,987 | 3,516,957 | 3,670,265 | 3,764,424 | 3,809,369 | 3.887,763 | 3,929,49 | 3,974,7 | 4,017,743 | 4,078,867 | 4,181,849 |
| Retire TY GR3 CR and GH1 | 3,239,207 | 3,292,000 | 3,356,181 | 3,444,654 | 3,487,886 | 3,549,096 | 3,720,631 | 3,820,01 | 3,872,2 | 3,936,1 | 3,981,450 | 4,047,560 | 4:078,775 | 4,194,685 |
| Retire TY GR and CR | 3,028,538 | 3.127,833 | 3.225.237 | 3,418,572 | 3,422,194 | 3,485,560 | 3,584.41 | 3,630,247 | 3,726,854 | 3,797,020 | 3,853,78 | 3,907,145 | 3,911,645 | 032,447 |
| Retire TY GR CR and MC4 | 3,265,676 | 3,317,295 | 3,364.667 | 3,434,348 | 3,502,301 | 3,566,140 | 3,760,848 | 3.877,599 | 3.95 | 3,97 | 4,03 | 4,030,517 | 4,072,360 |  |
| Retire TY GR CR and TC1 | 3,251,949 | 3,338,878 | 3,355,330 | 3,463,115 | 3,484,830 | 3,564,633 | 3,704,593 | 3,835,375 | 3,896,834 | 3,947,527 | 3,987,852 | 4,042.860 | 4,069.729 | 4,189,337 |
| Retire TY GR CR and GH4 | 3,282,974 | 3,340,850 | 3,350,207 | 3,471,962 | 3,509.465 | 3,640,933 | 3,819,709 | 3,861,468 | 3,945,790 | 3,954,963 | 4,026.707 | 4,064,01 | 4,082 | 4,193,762 |
| Retire TY GR CR and MC3 | 3.219.568 | 3,315.564 | 3,339,807 | 3,445,296 | 3,471,313 | 3.550,533 | 3.702,909 | 3,817,250 | 3,867,042 | 3,929,428 | 3,975.008 | 4,024,159 | 4,054,231 |  |
| Retire TY GR CR and GH2 | 3,282,509 | 3.342,502 | 3,372,967 | 3,466,107 | 3.519,584 | 3,635,374 | 3,802,638 | 3,862,531 | 3,949,795 | 3.982.537 | 4,021,330 | 4,0 | 4.077,882 | 4,173,352 |




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|  | NPVRR Delta at Varying Emergency Energy Cost (\$/MWh) |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | Compliance <br> Plan |
|  | 100 | 1,000 | 5,000 | 10,000 | $(16,600)$ |
| TY | 4 | 4 | 2 | 1 | -1 |
| GR3 | -26 | -28 | -39 | -52 | -69 |
| BR3 | 525 | 530 | 548 | 572 | 603 |
| CR4 | -166 | -162 | -142 | -119 | -87 |
| CR6 | 8 | 8 | 9 | 10 | 11 |
| BR1-2 | 205 | 207 | 213 | 220 | 230 |
| CR5 | -66 | -65 | -63 | -60 | -57 |
| GH3 | 888 | 890 | 898 | 908 | 921 |
| GH1 | 752 | 754 | 766 | 781 | 800 |
| GR4 | -96 | -96 | -95 | -95 | -94 |
| MC4 | 803 | 806 | 820 | 837 | 859 |
| TC1 | 930 | 933 | 949 | 969 | 996 |
| GH4 | 1,100 | 1,104 | 1,118 | 1,137 | 1,161 |
| MC3 | 705 | 708 | 720 | 736 | 756 |
| GH2 | 1,095 | 1,098 | 1,110 | 1,126 | 1,146 |
| MC1-2 | 942 | 946 | 965 | 990 | 1,022 |

[^4]
[^0]:    2/ Synthetic natural gas, propane air, coke oven gas, refinery gas, biomass gas, air injected for Btu
    stabilization, and manufactured gas commingled and distributed with natural gas.
    as gas from Canada and Mexico. 5 / Includes any natural gas used in the process of converting natural gas to liquid fuel that is not aclually converted. 6/ Includes any naturai gas converted inta liquid fuel.
    $7 /$ includes consumption of energy by electricity-only and combined heat and power plants whose primary

[^1]:    
    No CO2
    Low CO2
    Mid CO2

[^2]:    
    $\frac{\text { MTP Canital Delta }}{\text { No Retirements }}$

[^3]:    点
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[^4]:    Note: The values above reflect the correction of the landfill cost error identified by Dr. Fisher and the error identified by the Companies' in response to Supplemental Requests for Information of. Rick Clewett, Raymond Barry, Sierra Club and the Natural Resource Defense Council dated

    August 18, 2011, Question No. 8(b). The impact of these errors is insignificant.

