

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**JOINT APPLICATION OF LOUISVILLE GAS            )**  
**AND ELECTRIC COMPANY AND KENTUCKY        )**  
**UTILITIES COMPANY FOR A CERTIFICATE        )**  
**OF PUBLIC CONVENIENCE AND NECESSITY,     )** **CASE NO: 2004-\_\_\_\_\_**  
**AND A SITE COMPATIBILITY CERTIFICATE,     )**  
**FOR THE EXPANSION OF THE TRIMBLE         )**  
**COUNTY GENERATING STATION                )**

**DIRECT TESTIMONY OF**  
**JOHN N. VOYLES**  
**VICE PRESIDENT, REGULATED GENERATION**  
**LG&E ENERGY SERVICES INC.**

**Filed: December 9, 2004**

1 **Q. Please state your name, position, and business address.**

2 A. My name is John N. Voyles. I am Vice President of Regulated Generation for LG&E  
3 Energy Services Inc. on behalf of Louisville Gas & Electric Company ("LG&E") and  
4 Kentucky Utilities Company ("KU") (collectively "the Companies"). My business  
5 address is 220 West Main Street, Louisville, Kentucky 40202. My background and work  
6 experience are described in Appendix A.

7 **Q. Have you previously testified before this Commission?**

8 A. Yes. I have testified before the Commission in the Environmental Compliance Plan filing  
9 for LG&E in Case No. 94-332.

10 **Q. Are you sponsoring any exhibits?**

11 A. Yes. I will be sponsoring the following appendix and exhibits:

12 Exhibit JNV-1, Aerial Photo of Existing Trimble County Site

13 Exhibit JNV-2, Elevation views of typical sub-critical and super-critical boilers

14 Exhibit JNV-3, Reliability, Capital and O&M Cost - TC2 vs. IGCC and CFB

15 Exhibit JNV-4, SO<sub>2</sub> and NO<sub>x</sub> Netting-Out Summary

16 Exhibit JNV-5, Summary Schedule of TC2 Project Execution

17 **Q. What is the purpose of your testimony?**

18 A. The purpose of my testimony is to describe the location, technologies chosen, fuels,  
19 environmental controls, and construction plans of the Companies' proposed new  
20 generating unit from an engineering perspective.

21 **Q. Please describe the facility the Companies propose to construct in this proceeding?**

22 A. The Companies have proposed the construction of a new pulverized-coal ("PC") super-  
23 critical unit of 750 MW nominal net rating (732 MW net summer rating) ("TC2") located

1 adjacent to the existing operating unit (“TC1”) at the Trimble County Generating Station  
2 (“Trimble Station”). TC2 will employ state of the art air pollution control equipment to  
3 ensure environmental compliance. In fact, TC2 will have the lowest emissions per  
4 megawatt-hour produced of any coal-fired plant in Kentucky. It is anticipated that this  
5 air pollution control equipment will consist of a Selective Catalytic Reduction (“SCR”)  
6 system, Baghouse, Wet Flue Gas Desulphurization (“WFGD”) system, and Wet-  
7 Electrostatic Precipitator (“WESP”), with provisions for the addition of future controls  
8 for acid mist and mercury engineered into the design should air regulations change in the  
9 future.

10 **Q. Why was the Trimble Station chosen as the location for TC2?**

11 A. The Trimble Station was originally developed as a multi-unit site and much of the full  
12 plant infrastructure was installed at the time of construction of TC1. Specifically, the  
13 limestone barge unloader, limestone handling system, limestone grinding and slurry  
14 systems, coal barge unloader, coal handling system, site fire protection, site fuel oil  
15 storage, administrative offices, maintenance shops, warehousing facilities, site  
16 development, barge mooring cells and raw river water supply systems were placed into  
17 operation when TC1 was constructed. See Exhibit JNV-1. These systems were built to  
18 handle the operation of multiple units with little or no modifications. The Companies can  
19 take advantage of these existing systems and infrastructure that would otherwise need to  
20 be developed and constructed. This significantly reduces the construction costs over  
21 having to acquire the land and develop a generating station in its entirety at a “greenfield”  
22 site. In addition, significant staffing benefits will be realized by building at the Trimble  
23 County site by taking advantage of economies of scale. Staffing at TC1 alone consist of

1 approximately 80 full-time employees. The addition of TC2, while more than doubling  
2 the coal-fired generation of the station, will only require an 50% increase in full-time  
3 employees by adding approximately 30-40 employees to the staff. Finally, there is more  
4 than sufficient real estate available for construction and permanent facilities at the  
5 Trimble Station, and the site is well suited for the required transmission upgrades as the  
6 site was originally designed and constructed for multiple units. The Companies also  
7 enjoy a good relationship with the local community and have experienced no significant  
8 problems during the recent construction efforts of the SCR and combustion turbine  
9 projects. This excellent relationship and recent proven success of constructing large  
10 capital projects at the site should continue and we expect positive feedback on the project  
11 from the community.

12 **Q. How does TC2 complement the existing generating assets of the Companies?**

13 A. The last coal-fired generating unit installed by the Companies was TC1 in 1990. Since  
14 then, the native load demand for electricity has grown as discussed in Mr. Sinclair's  
15 testimony. In addition to native load growth since 1990, the Companies have been  
16 operating and maintaining the existing fleet of generating units. However, the  
17 Companies base load, coal-fired fleet now has an average age of 34 years of service, with  
18 approximately 650 MW at 40 years or older. While it is not unusual to have utility  
19 generating assets operating for this time period, the viability of a typical coal-fired unit  
20 with over 40 years of service becomes an ever-increasing challenge and older assets are  
21 more prone to failures that can be too costly to justify repairing. While TC2 is not being  
22 constructed to allow the decommissioning of some of our older, smaller coal-fired units,

1 its availability will decrease the risk to customers should circumstances cause one of our  
2 older units to be decommissioned sooner than anticipated.

### 3 CHOICE OF TECHNOLOGY

4 **Q. Why did the Companies choose the super-critical technology?**

5 A. Super-critical PC units have a higher thermal efficiency compared to other thermal power  
6 cycles, such as sub-critical pulverized coal and Circulating Fluidized Bed (“CFB”),  
7 because super-critical boilers operate at higher pressures and temperatures. The higher  
8 thermal efficiency reduces the fuel cost by reducing the amount of coal burned for the  
9 electricity produced, providing a benefit for the customers. There is also a significant  
10 environmental benefit from this higher efficiency since less fuel is combusted to produce  
11 the same electrical energy, therefore, less pollutants are emitted for the same mega-watt  
12 of electricity produced.

13 **Q. How did the Companies evaluate the available technologies?**

14 A. As a part of our evaluation of technologies for TC2, we focused on several key objectives  
15 on which to base a selection. Some of the key objectives were the economic assessments  
16 related to: the cost of construction, on-going O&M cost for the plant and environmental  
17 control for various technologies. Also, given the significant savings of constructing at  
18 Trimble Station where many of the original assets for a multi-unit site were installed with  
19 TC1, our approach called for reviewing and maximizing the use of those assets as far as  
20 economically practicable. The design fuel selection was focused around utilization of  
21 Kentucky coals and other regional bituminous high sulfur coals; however, the plant had  
22 to be able to burn a wide range of fuels, including western sub-bituminous coal without  
23 significantly impacting the capital or O&M cost of the project. Also, the technology

1 chosen preferably would preserve space for additional future options at the site as  
2 originally envisioned (potentially for a TC3 and TC4).

3 In addition, the Companies (i) conducted a world-wide technology review that  
4 utilized the engineering expertise of our parent and sister companies to gain the most  
5 recent knowledge of new units, (ii) researched users of the latest vintage units of each  
6 technology, and (iii) researched the marketplace through the major equipment providers  
7 of similar size units. Based on this review, the Companies determined that the best  
8 technology choice for TC2 is super-critical pulverized coal. Advances in component  
9 materials and designs have increased the reliability of super-critical units substantially  
10 beyond the early vintage super-critical boilers employed in the U.S. during the 1970's  
11 and early 1980's. In fact, super-critical technology has been the technology of choice  
12 world-wide over the last couple of decades with the installed capacity increasing by  
13 approximately 76,000 MW from 1982 to 2000. Most of this super-critical technology  
14 was installed and refined in Europe and Asia due to demand for coal-fired generation in  
15 those regions of the world. A review of coal-fired generation of TC2's size currently  
16 being built in North America or being permitted in the U.S. indicates that super-critical  
17 technology is the choice in the industry due to increased efficiency, reduced emissions  
18 and maturation of design.

19 **Q. Do the Companies or their parent company currently own any super-critical units?**

20 A. While the Companies do not own any super-critical units, the vast majority of PC boilers  
21 owned by our parent company in Europe are of super-critical technology with a total  
22 capacity near 20,000 MW.

23 **Q. How does the super-critical technology compare to the sub-critical technology?**

1 A. The main difference in the technologies is the operating pressure and temperature of a  
2 super-critical boiler, which is above the critical pressure of water at approximately 3200  
3 psi. The TC2 super-critical boiler will be designed to operate above 3,600 psi. A similar  
4 sub-critical boiler would operate at only 2,400 psi. From an engineers' perspective, this  
5 means that within the boiler the water turns to steam with no phase change thus no steam  
6 drum is required, whereas a sub-critical unit utilizes multiple pass steam/water circuits  
7 connected to a steam drum. Since there is no steam drum, start-up times are shorter and  
8 load ramp rates are faster which results in more flexible operations compared to the sub-  
9 critical unit. Exhibit JNV-2 shows the similarities between sub-critical and super-critical  
10 designs. It is important to note that the two designs are essentially the same for the entire  
11 station other than the absence of a steam drum in the super-critical boiler and the  
12 materials of construction are generally of higher quality tube metallurgy to accommodate  
13 the higher temperatures.

14 **Q. How does the super-critical technology compare to CFB and Integrated Gasification  
15 Combined Cycle ("IGCC") technologies?**

16 A. The CFB technology has not matured beyond the 300 MW size at this time, and therefore  
17 a multi-CFB unit installation would be required to provide 750 MW of capacity. This  
18 would result in a higher capital cost and revenue requirement when compared to a super-  
19 critical unit. Also, a multi-CFB unit installation would require more installation area  
20 from the site and would likely need to be built in the area currently designated for TC3  
21 and TC4. And, while the CFB technology does offer fuel flexibility, there are  
22 disadvantages such as lower thermal efficiency, longer startup times, and increased O&M  
23 costs. Further, with the more stringent SO<sub>2</sub> emission limits of today, CFB does not have

1 the cost advantage it once had over PC boilers (the ability to reduce SO<sub>2</sub> emissions to  
2 required levels by injection of limestone in the furnace without the use of a flue gas  
3 desulphurization process downstream of the steam generator). Best Available Control  
4 Technology (“BACT”) for sulfur-dioxide emissions would likely require the installation  
5 of a WFGD, thus eliminating a significant cost advantage once held by CFB over PC  
6 technology.

7 While the IGCC technology holds promise for sometime in the future, to date it  
8 has not demonstrated reliability comparable to that of super-critical technology which is  
9 desired for utility applications in the 750 MW capacity size. In fact, of the four coal-  
10 fueled IGCC facilities operating around the world today for electricity production (only  
11 two of which are in the U.S.), none of the operators report availabilities above seventy-  
12 nine (79) percent, far less than the ninety-five (95) percent target for TC2. A summary of  
13 the availabilities reported by the operators of IGCC during the October 2003 Gasification  
14 Technologies Conference can be found in Exhibit JNV-3.

15 The air permitting studies for TC2 that were performed by Black & Veatch  
16 analyzed the super-critical pulverized coal design against CFB and two different IGCC  
17 designs. The report indicated that a comparable 750 MW size IGCC generating unit  
18 installed at the Trimble Station would require over \$400 million more in capital  
19 investment and would have substantially higher O&M costs than the super-critical boiler  
20 while being substantially less reliable and much more complex to operate. The  
21 comparison for cost and reliability can be found in Exhibit JNV-3. Further, as described  
22 in Ms. Dodson’s testimony, the environmental aspects of IGCC are nearly equivalent to  
23 the TC2 design for a substantially less expensive and more reliable design.



1 In summary, the complexity and relative technological immaturity of the IGCC  
2 process in a utility application increases the opportunities for deficiencies in design,  
3 vendor supplied equipment, construction, operation, and maintenance. The Companies  
4 feel the risk is too high for cost overruns and low availability, and that being on the  
5 cutting edge of this technology would be an unnecessary risk for their customers.  
6 However, while the time is not right for IGCC as the technological choice for TC2, the  
7 Companies are committed to staying abreast of IGCC developments for consideration in  
8 meeting potential future generating needs of the Companies.

9 **Q. What is the significant environmental benefit of the super-critical technology?**

10 A. The higher thermal efficiency (less coal burned per MW of production) of a super-critical  
11 boiler directly impacts the environmental emission rates from the unit. With this  
12 efficiency benefit and the air pollution controls to be installed, when the unit goes into  
13 service in 2010, the total emissions from TC1 and TC2 will be less than TC1's 2000-  
14 2001 baseline for two major pollutants (NO<sub>x</sub> and SO<sub>2</sub>). The TC2 air permit is based on  
15 this "netting out" of NO<sub>x</sub> and SO<sub>2</sub> at the Trimble Station. This means that even though the  
16 station generating capacity will be more than doubled, the combined emissions for each  
17 pollutant will not significantly increase. TC2 will employ the most modern air pollution  
18 control equipment available. With respect to NO<sub>x</sub> and SO<sub>2</sub> combined, TC2 will be the  
19 cleanest coal-fired unit per MWh produced in Kentucky. Calculations summarizing this  
20 netting out are provided in Exhibit JNV-4.

21 **OPERATION AND MAINTENANCE**

22 **Q. What fuels will TC2 use?**

1 TC2 will use the same Number 2 fuel oil for startup as is presently used for TC1. The  
2 primary fuel will be high sulfur coal; however, a new coal blending system will be added  
3 to the existing coal handling system during the construction of TC2 that will provide the  
4 capability for burning blends of coal, including high sulfur Kentucky, lower sulfur  
5 eastern and western sub-bituminous (Powder River Basin) coals. This blending  
6 capability gives the Companies maximum flexibility in coal choice, thus enabling the  
7 Companies to better manage fuel costs.

8 **Q. Will the similarities between TC1 and TC2 result in operating efficiencies?**

9 A. Yes. Given the similarities between TC1 and TC2 as shown in Exhibit JNV-2 comparing  
10 a sub-critical boiler to a super-critical boiler, the Companies expect to spend considerably  
11 less dollars on operation and maintenance of TC2 than if the same unit were built in a  
12 greenfield application. By utilizing the existing systems identified earlier in my  
13 testimony (i.e., limestone systems, coal systems, river water intake, site fire protection,  
14 etc.) the incremental O&M associated with operating and maintaining these systems is  
15 small in comparison to the total cost spent currently for TC1 only. With regards to  
16 personnel, TC1 currently employs approximately 80 people. The increase in staffing for  
17 the addition of TC2 is expected to be approximately 30-40 positions. A comparison of  
18 incremental personnel and O&M costs for TC2 with the current cost of TC1 shows the  
19 cost advantages of constructing for our native load needs at the existing Trimble County  
20 site.

21 **CONSTRUCTION**

22 **Q. Please describe the construction plans for TC2.**

1 A. Construction of TC2 will be primarily performed through a single Engineering,  
2 Procurement and Construction (“EPC”) contract that will primarily include the boiler, air  
3 pollution control equipment, and turbine generator systems. The contracting process of  
4 utilizing a single EPC contract is very common in today’s marketplace for owners that  
5 want to manage schedule, performance and price risk. The EPC contract will have  
6 significant penalties associated with these areas of risk to protect the Companies and the  
7 customers. Some relatively minor portions of the project may be constructed by the  
8 Companies, independent of the EPC contractor. The Companies will employ an Owner’s  
9 Engineer to assist the Companies in certain functions of the project, such as preparing the  
10 EPC bid package, assisting in the management of communication during the bid  
11 clarification period, support during the contract award process, support for conceptual  
12 and detailed engineering reviews, and support for site construction management.

13 **Q. Please describe the bidding phase for TC2.**

14 A. The bidding process for the major EPC contract will use a functional technical  
15 specification with a typical set of turn-key, lump sum fixed price terms and conditions for  
16 a project of this scale. The specification and contract will include a full performance  
17 wrap (i.e., equipment warranties, schedule guarantees, emission rate guarantees, etc.) to  
18 ensure the contractor delivers the project on time, within budget and within the required  
19 performance criteria. Proposals will be solicited from a set of pre-qualified entities,  
20 including EPC contractors, major equipment providers, and engineering firms. The  
21 Companies have already completed the pre-qualification process and plan to issue the bid  
22 documents the week of January 24, 2005. The bidders have three months to provide their  
23 initial bids, followed by a proposal review period of approximately three months, at

1 which time the detailed negotiations for the project will begin. Detailed negotiations on  
2 scope, schedule, price and other commercial terms will then proceed through the  
3 remainder of 2005. The schedule targets providing the selected bidder with a limited  
4 notice to proceed in the December 2005 to January 2006 timeframe. A summary  
5 schedule of the project is shown in Exhibit JNV-5.

6 **Q. Please describe the prequalification process for TC2.**

7 A. The Companies hired Cummins and Barnard, an Engineering firm from Michigan with  
8 recent U.S. experience on similar projects, to assist us with development of a detailed  
9 process. The main components of the process were a description of the project both  
10 technically and commercially along with a detailed formal questionnaire issued to  
11 prospective vendors and Original Equipment Manufacturers (“OEM”). The questionnaire  
12 required detailed information regarding engineering, administrative, project management,  
13 construction, and safety experience for similar projects. It also inquired as to the entities’  
14 financial capabilities by requiring submittal of standard financial data. The questionnaire  
15 required responses to other commercial areas such as the willingness to accept schedule  
16 and performance Liquidated Damages, and the ability for partners in the project to be  
17 held jointly and severally liable. The potential vendors were allowed to present their  
18 qualifications, both commercially and technically, regarding how each would manage the  
19 project to a team comprised of engineers, managers and senior management from within  
20 the Companies that are involved with the development of the project. The respondents  
21 were ranked using structured scoring criteria by both the internal team and the Cummins  
22 and Barnard participants.

23 **Q. Are there permits that will be required as part of the construction on TC2?**

1 A. Yes. The environmental permits are discussed in the testimony of Ms. Dodson. In  
2 addition, permits routinely required for construction (i.e., plumbing, building, etc.) will  
3 be obtained at the appropriate time as necessary.

4 **Q. Please describe the construction timeline for TC2.**

5 A. Once the successful EPC bidder is selected, the Companies expect the actual construction  
6 to take approximately four years. The expected timeline for construction of TC2 is as  
7 follows: EPC bidding and contract award process to be completed by the end of 2005;  
8 construction to begin in the first quarter 2006 and be mechanically completed in the  
9 fourth quarter of 2009; commissioning, startup, and testing phase following mechanical  
10 completion through the first quarter of 2010; and commercial operation in the second  
11 quarter of 2010. This summarized schedule is shown in Exhibit JNV-5.

12 **Q. Will there be any new jobs created by the TC2 project?**

13 A. Yes. As mentioned earlier, we expect to add between 30 to 40 permanent positions at the  
14 Trimble Station specific to TC2. We estimate that about 650 construction employees will  
15 be required on average for each of the four years of construction with a peak of nearly  
16 1,200 construction workers or about 2,700 man-years.

17 **Q. Why are the Companies filing for a CCN prior to signing an EPC contract?**

18 A. The Companies recognize that it may take a number of months for approval of the CCN  
19 filing and the necessary pre-construction environmental permits and also know from  
20 experience that the large scope of the project will require an extensive bidding,  
21 evaluation, and negotiation period. In order to receive proposals with better price  
22 certainty and avoid a large contingency for an uncertain start date, the Companies believe  
23 it is prudent to synchronize these three efforts so that the best price is received for a

1 schedule that supports the desired commercial operating date within the construction  
2 commencement restrictions of the air permit. Any EPC contract entered into will be  
3 contingent upon the grant of a CCN and Site Compatibility Certificate from this  
4 Commission.

5 **Q. Have the Companies performed any construction work for TC2?**

6 A. No. The Companies have only conducted typical development activities, such as  
7 preliminary geotechnical investigations and noise surveys, but have not performed any  
8 permanent work related to TC2.

9 **COSTS OF FACILITY**

10 **Q. What are the expected costs of TC2?**

11 A. The expected capital cost for construction of TC2 is \$1.1 billion. The project cost was  
12 originally derived with the assistance of Burns & McDonnell Engineering in 2002. The  
13 cost was then independently reviewed and updated by Cummins & Barnard in January  
14 2004 to account for subsequent scope and market changes. This includes escalation,  
15 contingency, and owner's costs, but excludes costs for transmission facilities. As  
16 explained in the testimony of Mr. Blake, 25% of the costs will be borne by other project  
17 participants, and therefore the Companies' construction costs are expected to be about  
18 \$800 million, excluding transmission facilities. The projected annual O&M expenses  
19 associated with the Companies' 75% ownership for TC2 in 2004 dollars for non-fuel,  
20 fixed and variable O&M is \$11.3 million.

21 **Q. Based on the review and analysis to date, what conclusions have the Companies**  
22 **reached?**

1 A. The Companies have concluded that the installation of TC2 at the Trimble Station  
2 provides the best choice option available. The selection of a 750 MW nominal net super-  
3 critical unit will provide the Companies' customers with a proven technology, adding the  
4 most reliable, lowest cost generating asset to the existing fleet of generating assets to  
5 meet the growing load requirements. The unit design provides the least cost supply  
6 alternative inclusive of state-of-the-art environmental controls, while preserving fuel  
7 flexibility to manage the cost of coal for today's needs and beyond.

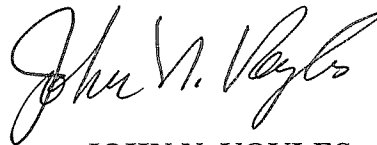
8 **Q. Does this conclude your testimony?**

9 A. Yes, it does.

**VERIFICATION**


**STATE OF KENTUCKY    )**  
  **) SS:**  
**COUNTY OF JEFFERSON)**

The undersigned, **John N. Voyles**, being duly sworn, deposes and says that he is the Vice President of Regulated Generation LG&E Energy Services Inc., that he has personal knowledge of the matters set forth in the foregoing testimony, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
**JOHN N. VOYLES**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 2nd day of December, 2004.

(SEAL)

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

\_\_\_\_\_





## Appendix A

### **John N. Voyles, Jr.**

Vice President - Regulated Generation  
LG&E Energy LLC  
220 West Main Street  
P.O. Box 32010  
Louisville, Kentucky 40202  
(502) 627-4762

### **Education**

Rose-Hulman Institute of Technology, B.S. in Mechanical Engineering - 1976  
Emory Business School, Management Development Program - 1992  
University of Louisville  
    The Effective Executive - 1993  
    Center for Creative Leadership-1996  
Leadership Louisville 2004-2005

### **Previous Positions**

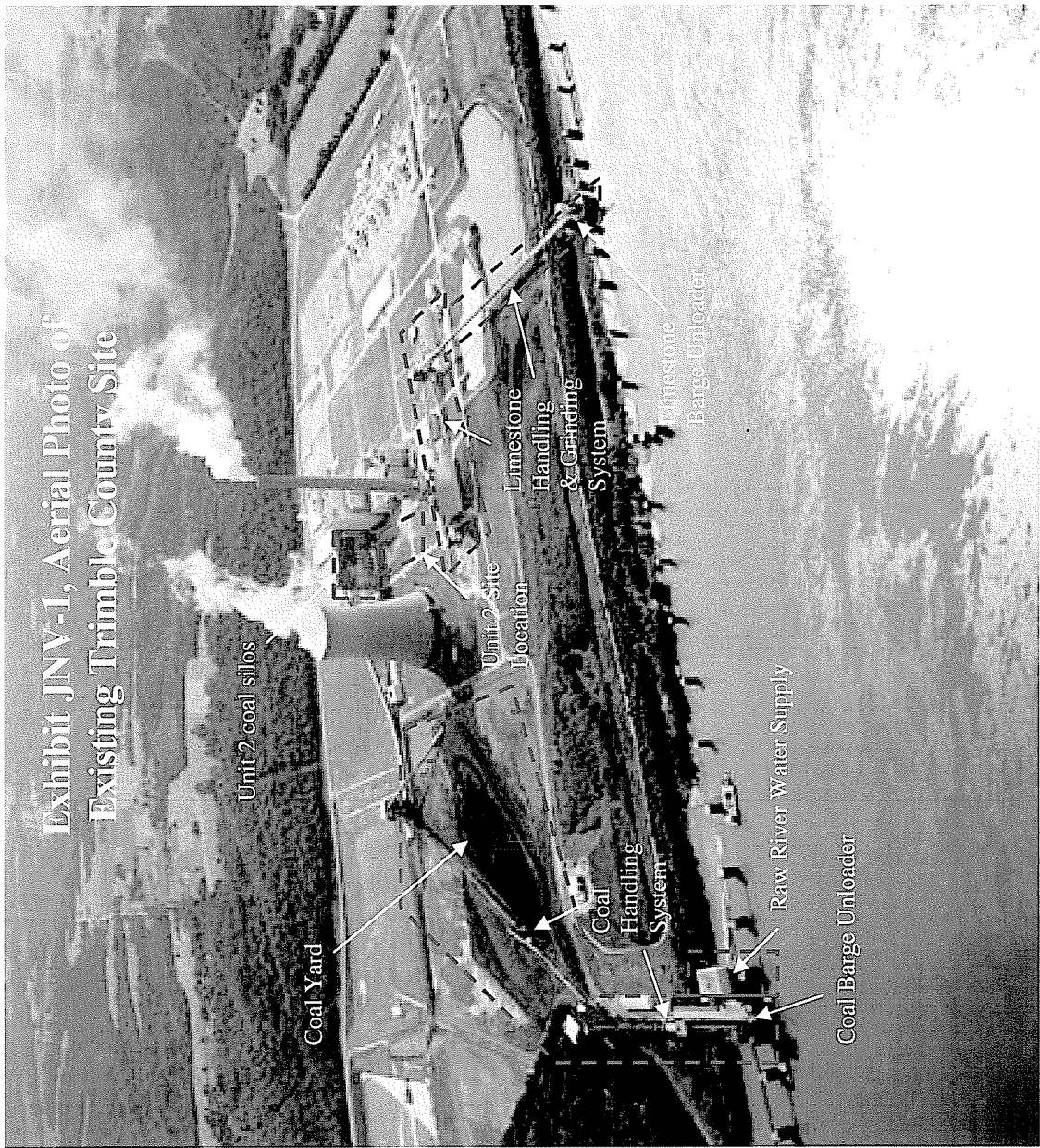
LG&E Energy LLC, Louisville, Kentucky  
2003 (Feb to May) – Director, Generation Services

Louisville Gas and Electric Company, Louisville, Kentucky:  
1998-2002 – General Manager, Cane Run, Ohio Falls & Combustion Turbines  
1996-1998 – General Manager, Jefferson County Operations  
1991-1995 – Director, Environmental Excellence  
1989-1991 – Division Manager, Power Production, Mill Creek  
1984-1989 – Assistant Plant Manager, Mill Creek  
1982-1984 – Technical and Administrative Manager, Mill Creek  
1976-1982 – Mechanical Engineer

### **Other Professional Associations**

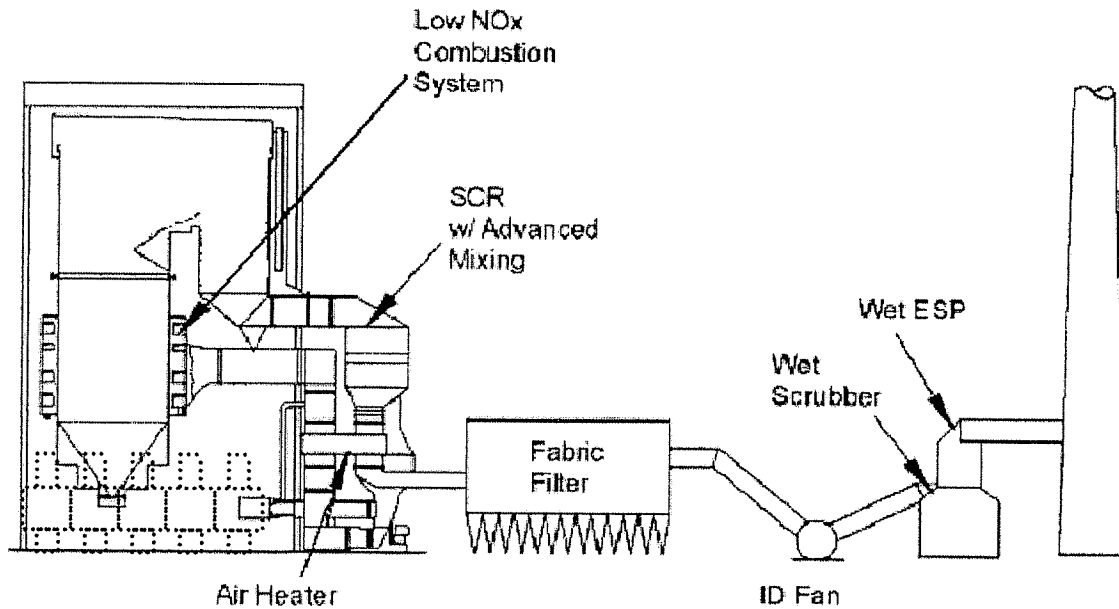
Research Advisory Committee, Electric Power Research Institute (EPRI)  
Board of Directors, Electric Energy Inc.  
Board of Directors, Ohio Valley Electric Corp. (OVEC)

# Exhibit JNV-1, Aerial Photo of Existing Trimble County Site

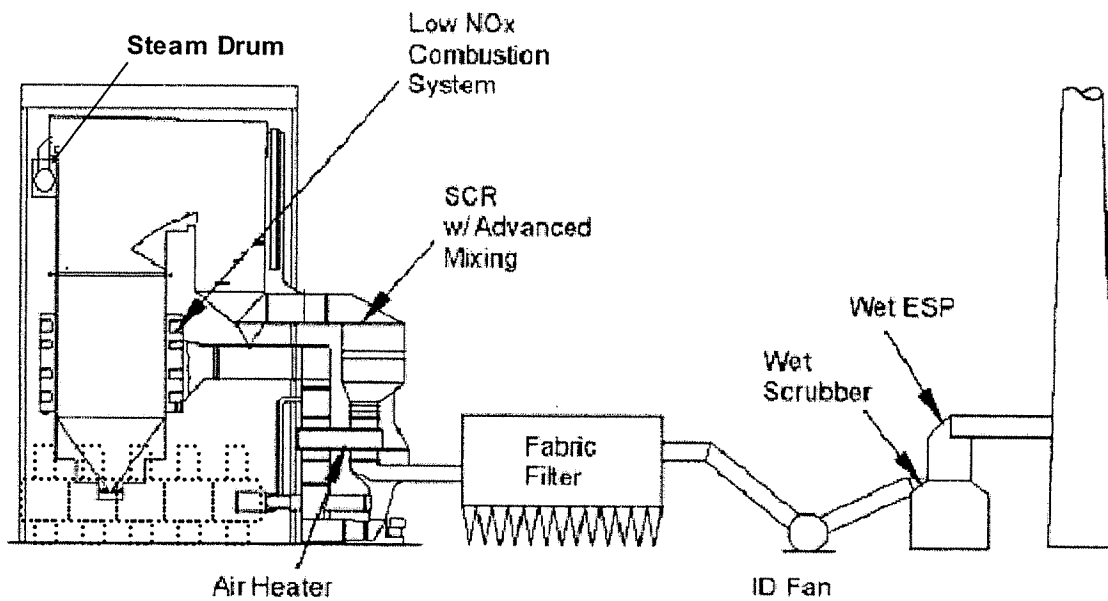


## Exhibit JNV-2 - Elevation views of typical sub-critical and super-critical boilers

Super-critical Boiler Arrangement



Sub-critical Boiler Arrangement



## Exhibit JNV-3, Reliability, Capital and O&M Cost – TC2 vs. IGCC and CFB

<b>Summary Comparison Of Technologies</b>				
	<b>CFB</b>	<b>Supercritical PC</b>	<b>IGCC</b>	
Configuration	3 CFB boilers, 1 STG	1 PC Boiler, 1 STG	GE Quench	Shell
Net Plant Output at 59F	750	750	793	802
Heat Rate at 59F	9,134	8,793	9,360	8,510
EPC Cost, 2004 \$million	852	797	1,024	1051
Owner's Costs	297	279	358	367
Start-up Contingency	0	0	102	105
Total Project Cost	1,149	1,076	1,484	1,523
Specific Cost, \$/kW	1,532	1,435	1,871	1,899
Fixed O&M, \$/kW-yr	18.42	17.46	22.07	20.82
Variable O&M, \$/MWh	3.45	2.76	5.59	4.85

### **IGCC Reliabilities:**

Reported in the October 2003 Gasification Technologies Conference:

- NUON, Netherlands – 67.3 percent in 2002, 72.5 percent in 2003 YTD
- Polk County, Florida – 74 percent in 2002, 68 percent in 2003 YTD
- Puertollano, Spain – 63.7 percent in 2002, 51.9 percent in 2003 YTD
- Wabash, Indiana – 78.7 percent in 2002, 74 percent in 2003 YTD

# Exhibit JNV-4, SO<sub>2</sub> and NO<sub>x</sub> Netting-Out Summary (page 1 of 2)

## Trimble County 2 Net Out Summary for NO<sub>x</sub>

- ◆ **Accept a Federally Enforceable Limit (FEL) for TC1 of 5556 TPY of NO<sub>x</sub> beginning on January 1, 2005**

- ◆ **NO<sub>x</sub> Net Out Calculation**

2000-2001 Baseline Actual Emissions (BAE)	7,041.1 tons
TC2 Potential to Emit (PTE) @ .0496 lb/mmBtu	- 1,508.1 tons
Auxiliary Equipment Emissions	- 16.0 tons
New Source Review (NSR) Significance Level	+ <u>39.0 tons</u>
TC1 FEL on NO <sub>x</sub> Annual Tons	5,556.0 tons

- ◆ **New FEL not expected to increase TC1 SCR use beyond Five Month Ozone Season (heat input = permit limit of 5,333 mmBtu/hr)**

Five Month Ozone Season Emissions @ .05 lb/mmBtu @ 100% LF

486.6 tons

Seven Month Emissions @ .38 lb/mmBtu @ 100% LF

5,177.8 tons

Total Expected TC1 Annual NO<sub>x</sub> Emissions

5,664.4 tons @ 100% LF  
5,556.0 tons @ 98% LF

# Exhibit JNV-4, SO<sub>2</sub> and NO<sub>x</sub> Netting-Out Summary (page 2 of 2)

## Trimble County 2 Net Out Strategy for SO<sub>2</sub>

- ◆ Accept a FEL for TC1 of 4,821.5 TPY of SO<sub>2</sub> beginning on January 1, 2006
- ◆ Modification required to TC1 FGD during October 05 Outage

- ◆ SO<sub>2</sub> Net Out Calculation

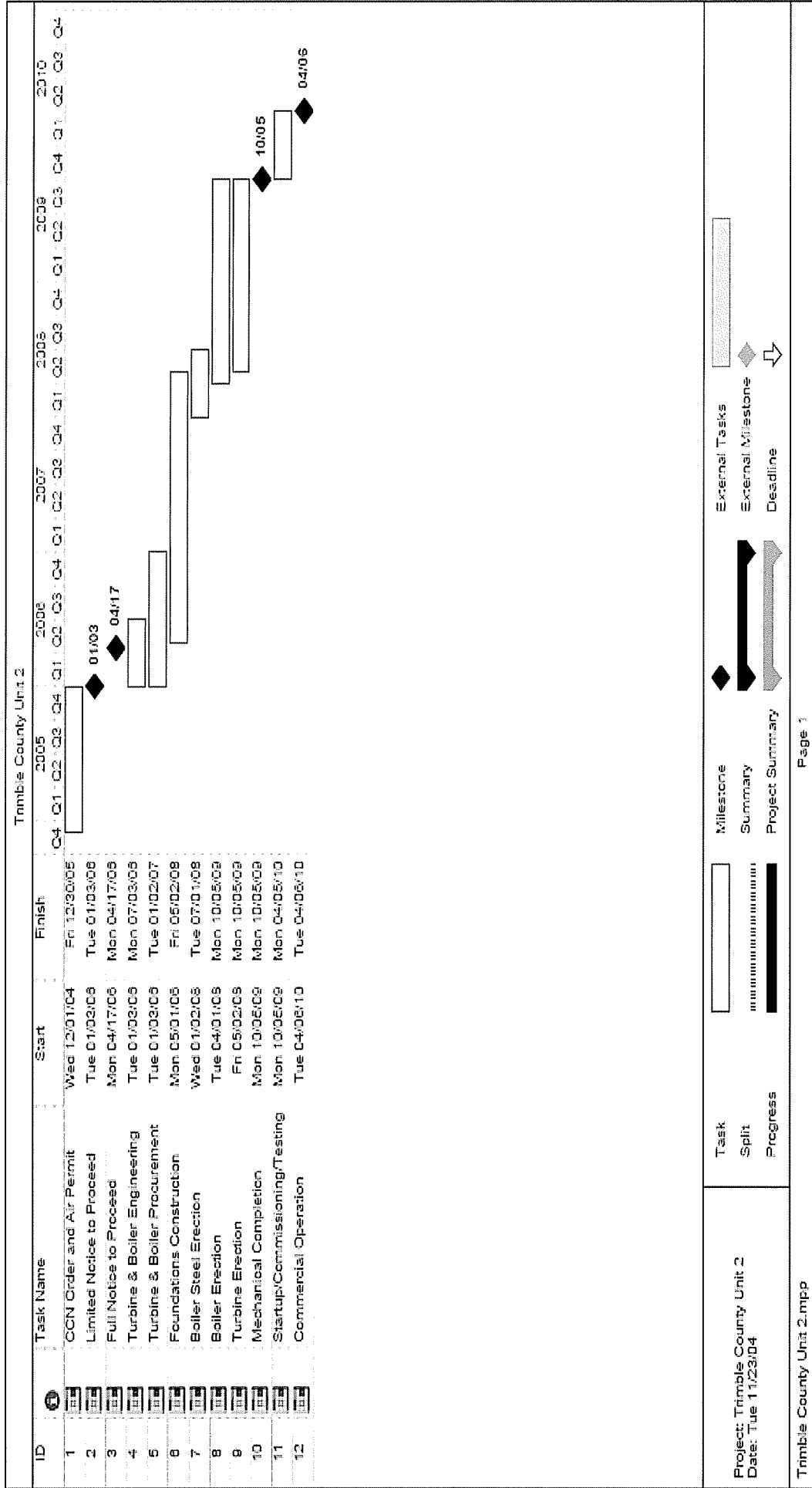
2000-2002 BAE	8,046.9 tons
TC2 PTE @ .745 lb SO <sub>2</sub> /hr (1)	- 3,263.1 tons
Auxiliary Equipment Emissions	- 1.3 tons
NSR Significance Level	+ 39.0 tons
TC1 FEL on SO <sub>2</sub> Annual Tons	<hr/> 4,821.5 tons

- ◆ At 100% LF and a heat input of 5,333 mmBtu/hr for TC1 the new FEL of 4821.5 tons requires:

- Annual Average Emissions of .206 lb SO<sub>2</sub>/mmBtu
- 97.05% Removal Efficiency on 7 lb SO<sub>2</sub>/mmBtu Coal
- 96.25% Removal Efficiency on 5.5 lb SO<sub>2</sub>/mmBtu Coal

(1) 98% Removal on Performance Coal

# Exhibit JNV-5, Summary Schedule of TC2 Project Execution



Project: Trimble County Unit 2  
Date: Tue 11/23/04

Task  
Split  
Progress

Milestone  
Summary  
Project Summary

External Tasks  
External Milestone  
Deadline