

CO₂ Reduction Alternatives Focusing on Natural Gas Utilization



PPL companies

February 9, 2022

**Case No. 2022-00402
Attachment 6 to Response to JI-1 Question No. 1(c)
Page 1 of 12
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Objective

- What is the most cost-effective means of reducing CO₂ emissions?
- Other considerations:
 - What can be done in near-term, without spending capital?
 - What are longer-term solutions, or solutions that require capital to implement?
- Categories of alternatives evaluated:
 - Displace coal with SCCT energy
 - Natural gas co-firing
 - Natural gas conversion
 - Incremental solar
 - Replace 2028 SCCTs w/ NGCC

Background Information

- All alternatives are compared to IRP reference case through 2036
 - Coal Retirements:
 - MC1 at end of 2024
 - MC2 and BR3 in 2028
 - GH1-2 in 2034
 - Additions:
 - 100 MW solar in 2023 (Rhudes Creek)
 - 125* MW solar in 2025 (Ragland)
 - 2 SCCTs (440 MW) and 500 MW solar in 2028
 - 4 SCCTs (880 MW) and 1,600 MW solar in 2034
 - 100 MW battery storage in 2035
 - 100 MW battery storage in 2036
- CO₂ emissions
 - 2010 baseline emissions for PPL are 62.6 million metric tons CO₂+CO₂e
 - 2022 forecasted emissions for LKE are 26.5 million metric tons CO₂+CO₂e
 - 1 million metric tons reduction is 1.6% reduction compared to 2010 PPL baseline

*IRP analysis assumed 160 MW PPA for Green Tariff Option 3 in 2025. This analysis was updated to reflect final contract value of 125 MW.

Case No. 2022-00402

Attachment 6 to Response to JI-1 Question No. 1(c)

Summary of Results

- Most cost-effective near-term alternative is displacing coal with SCCT energy
- Most expensive alternative is gas conversion
- Most cost-effective actionable alternative overall is adding incremental solar
 - Replacing SCCT w/ NGCC not considered actionable

Cost Considerations

- No changes to assumed retirement dates were contemplated in this analysis
- System production costs (fuel & variable O&M)
- Lost CCR revenue
- Gas conversion costs/savings
 - Conversion capital
 - Gas pipeline capital
 - Incremental firm gas transportation costs
 - O&M savings from reduced labor & coal handling needs; reduced reagent costs
 - Fixed coal transportation savings (rail, barging costs)
- Other items
 - Cost differences between SCCT and NGCC
 - Solar PPA costs; REC prices
 - Not quantified/considered in this analysis:
 - IMEA/IMPA reimbursement
 - OSS implications
 - Alternative gas price forecasts
 - Implementation risk (e.g., pipeline permitting for conversion alternatives)

Case No. 2022-00402

Attachment 6 to Response to JI-1 Question No. 1(c)

Page 5 of 12

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Alternatives Evaluated

| Category | Alternative | Description | Affected Units | Notes |
|----------|------------------------------------------|-----------------------------------------------------------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Disp | Displace coal with SCCT energy (6 cases) | Commit select coal units after SCCTs (out of merit order) | Various configurations of BR3, GH4, MC1-2 | Capacity factors of these coal units typically < 10%. Units remain available to ensure reliability. |
| CoF | NG co-firing (3 cases) | Use existing infrastructure to co-fire NG | Various configurations of MC3-4, TC1-2 | BR/GH use oil as start fuel and can't co-fire without modifications. MC gas supply and unit constraints limit capability to 7.5% for MC3-4 only. TC1-2 can accommodate 10% without modification. |
| Conv | NG conversion (5 cases) | Fully convert coal-fired units to burn NG | Various configurations of BR3, GH1-4, MC2-4, TC1-2 | Capital intensive. Engineering studies imply lost efficiencies, resulting in increased heat rates and reduced max capacities. |
| Sol | Incremental solar (2 cases) | Add new solar PPAs | | Analysis assumes new PPAs online in 2025 at a cost of \$28.05/MWh. |
| CC | Build NGCCs instead of SCCTs (2 cases) | Replace 2x SCCTs (440 MW) in 2028 with 1x NGCC (513 MW) | | Analysis considered two scenarios: normal depreciation, and accelerated depreciation of incremental capital. |

Case No. 2022-00402

Attachment 6 to Response to JI-1 Question No. 1(c)

CO₂ Reduction Cost and Potential

- Least-Cost CO₂ reductions (no capital)

| Time Frame | Alternative | Annual Fuel Cost (\$M) | Annual CO ₂ Reduction (000 metric tons/year) | Levelized CO ₂ Reduction Cost (\$/metric ton) |
|------------|--------------------------|------------------------|---------------------------------------------------------|----------------------------------------------------------|
| 2022-2024 | Commit BR3 After SCCTs | 6 | 348 (0.6%) | 18 |
| 2025-2036 | Incremental 200 MW solar | 1 | 344 (0.5%) | 4 |

- Highest-impact CO₂ reductions (no capital)

| Time Frame | Alternative | Annual Fuel Cost (\$M) | Annual CO ₂ Reduction (000 metric tons/year) | Levelized CO ₂ Reduction Cost (\$/metric ton) |
|------------|--------------------------------------|------------------------|---------------------------------------------------------|----------------------------------------------------------|
| 2022-2036 | Commit MC1-2, BR3, & GH4 After SCCTs | 31 | 920 (1.5%) | 34 |

- Least-Cost CO₂ reductions (with capital spend)

| Time Frame | Alternative | Annual Fuel Cost (\$M) | Annual CO ₂ Reduction (000 metric tons/year) | Levelized CO ₂ Reduction Cost (\$/metric ton) |
|------------|-------------------------------------|------------------------|---------------------------------------------------------|----------------------------------------------------------|
| 2028-2036 | Replace 2028 SCCTs with 513 MW NGCC | (22) | 1,586 (2.5%) | 4 |

- Gas conversion alternatives were highest cost

Case No. 2022-00402

Attachment 6 to Response to JI-1 Question No. 1(c)

Page 7 of 12

Results Summary

| Category | Alternative | Levelized CO ₂ Reduction Cost (\$/metric tons) | Average CO ₂ Removed (000s metric tons/year) | Average Annual Change in Fuel/O&M Costs (\$M/year) | Incremental Capital (\$M) |
|-------------|-----------------------------------------------------------------------|-----------------------------------------------------------|---------------------------------------------------------|----------------------------------------------------|---------------------------|
| -- | 2021 IRP Reference Case* | -- | -- | -- | -- |
| CC | Replace 2028 SCCTs with 513 MW NGCC (40-Yr Depreciable Life) | 4 | 1,586 (2028-2036) | (22) | 242 |
| Sol | Incremental 200 MW Solar | 4 | 344 (2025-2036) | 1 | 0 |
| Sol | Incremental 100 MW Solar | 4 | 170 (2025-2036) | 1 | 0 |
| CC | Replace 2028 SCCTs with 513 MW NGCC (Full Recovery of \$242M by 2036) | 13 | 1,586 (2028-2036) | (22) | 242 |
| Disp | Commit BR3 After SCCTs | 18 | 348 (2022-2027) | 6 | 0 |
| Disp | Commit MC1 & BR3 After SCCTs | 26 | 517 (2022-2027) | 13 | 0 |
| CoF | NG Co-Fire: TC1-2 | 27 | 233 (2022-2036) | 6 | 0 |
| Disp | Commit MC1-2 & BR3 After SCCTs | 31 | 760 (2022-2027) | 23 | 0 |
| Disp | Commit BR3 & GH4 After SCCTs | 31 | 769 (2022-2036) | 24 | 0 |
| CoF | NG Co-Fire: MC3-4 & TC1-2 | 33 | 485 (2022-2036) | 16 | 0 |
| Disp | Commit MC1-2, BR3, & GH4 After SCCTs | 34 | 920 (2022-2036) | 31 | 0 |
| Disp | Commit MC1 After SCCTs | 37 | 294 (2022-2024) | 11 | 0 |
| CoF | NG Co-Fire: MC3-4 | 40 | 235 (2022-2036) | 10 | 0 |
| Conv | NG Conversion: MC3-4 | 56 | 1,416 (2024-2036) | 66 | 108 (12 pipe) |
| Conv | NG Conversion: Fleet | 64 | 5,952 (2024-2036) | 333 | 682 (179 pipe) |
| Conv | NG Conversion: BR3, GH1-4, & MC3-4 | 73 | 4,193 (2024-2036) | 265 | 580 (179 pipe) |
| Conv | NG Conversion: BR3 | 97 | 259 (2024-2027) | 2 | 92 (46 pipe) |
| Conv | NG Conversion: MC2 | 119 | 271 (2024-2027) | 30 | 112 pipe) |

Conclusions

- No alternatives have lower PVRR than Reference Case
- Adding more solar is lowest-cost actionable alternative for reducing CO₂, but annual reductions are small and would not begin until 2025
- CO₂ reduction cost for gas conversion is two to three times higher than displacement and co-firing, but annual CO₂ reduction potential is greater
- Cost of displacement and co-firing is \$6 to \$31 million per year
- Absent long-term technology risk, NGCC is most cost-effective alternative for reducing significant quantities of CO₂ through 2036

Appendix



PPL companies

Case No. 2022-00402

Attachment 6 to Response to JI-1 Question No. 1(c)

Page 10 of 12

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Gas Conversion Assumption Summary

| \$M | BR3 | GH1 | GH2 | GH3 | GH4 | MC2 | MC3 | MC4 | TC1 | TC2 |
|----------------------------------|------|------|------|------|------|-----|------|------|-----|------|
| Conversion Capital (2023\$) | 46 | 53 | 54 | 54 | 53 | 45 | 44 | 53 | 41 | 61 |
| O&M Savings (2024\$) | (11) | (12) | (12) | (12) | (12) | (9) | (10) | (12) | (9) | (14) |
| Firm Gas Transportation (2024\$) | 15 | 16 | 16 | 16 | 16 | 10 | 13 | 16 | 12 | 16 |

- Conversion capital and annual O&M savings for Brown 3 and Mill Creek 2 based on engineering studies. Cost for other units scaled from Brown 3 based on max summer capacity.
- Annual firm gas transportation costs derived using Cane Run 7 costs scaled to daily gas burn at full load for converted units.
- Pipeline capital (2023\$)
 - Brown: \$46 M
 - Ghent: \$120 M
 - Mill Creek: \$12 M
- Station fixed coal transport costs (2024\$)
 - Brown: \$7 M
 - Ghent: \$3 M
 - Mill Creek: \$2 M
 - Trimble County: \$1 M
- Loss of efficiency expected to increase net heat rates by 13.6% based on engineering studies and feedback from peer utilities.
- Gross maximum capacity expected to decrease by ~5% per unit, partially offset by a decrease in aux load due to reduced environmental controls (e.g., FGD, baghouses), resulting in ~2% loss in net maximum capacity by unit.
- Minimum capacity expected to decrease by 25%, allowing for more unit turndown capability.
- Analysis assumes 50% reduction in ammonia costs due to reduced NO_x emissions from gas combustion. Analysis assumes elimination of costs from all other reagents for environmental controls of converted units.

Case No. 2022-00402

Attachment 6 to Response to JI-1 Question No. 1(c)

Gas Co-Firing Assumption Summary

- Brown and Ghent units are unable to co-fire NG without modifications to switch startup/stabilization fuel from oil to gas.
- Mill Creek is currently served by the LG&E LDC. Existing gas supply lines and unit constraints limit co-firing capability. Without modifications, co-firing would be limited to ~7.5% on units 3 and 4 only.
- Trimble County is capable of 10% co-firing on units 1 and 2 without modifications.
- Analysis assumes units can revert to 100% coal as needed, obviating need for incremental firm gas transport to co-fire.