Briefing on the Council's Direction for the Methodology for Quantifying Environmental Costs and Benefits of Resources

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Quick Review

- Council released issue paper on Sept 10 on the environmental costs and benefits methodology for draft Seventh Power Plan
- Public comment period Sept 10 Oct 31
 - Received 23 comments from stakeholders
- Council discussed summary of comments at November Council Meeting
- December Council Meeting staff received guidance from the Council on the methodology to use in the resource analysis for the draft Seventh Plan





Environmental Costs and Benefits Methodology for **New Resources**

- 1. Estimated costs of compliance with existing environmental regulations
- 2. <u>Proposed environmental regulations</u> and estimated costs of compliance as a risk
- 3. Approach on <u>residual</u> environmental effects/damage/social costs
- 4. Approach on quantifiable <u>environmental</u> <u>benefits</u>





Treatment of **Existing Resources** in Terms of Environmental Costs

- 1. Estimating cost to existing system of compliance with <u>existing environmental regulations</u>, including new regulations adopted since Sixth Power Plan
- 2. How to analyze the risk of costs imposed to deal with emissions and other effects <u>not yet subject to comprehensive environmental regulation</u>, but the subject of proposed regulations or likely regulatory policy, in particular:
 - Carbon dioxide emissions
 - Coal fly ash proposed regulations





Guidance from the Council – New Resources

- Capture estimated costs of compliance for existing regulations in new resource assumptions
 - Not planning on modeling new coal plant in RPM
- Capture estimated costs of proposed regulations, namely 111b, in new resource assumptions



Guidance from the Council – Existing Resources

- Capture, to extent feasible, cost of compliance with existing regulations for existing resources
 - MATS, Regional Haze Rule, for example
- Assume system compliance with RPS requirements
- Run scenario analyses for proposed regulations, i.e. 111d
 - Council will discuss possible scenarios over the next several months





How you can help!

- Staff is gathering the cost of compliance with existing and proposed regulations
 - Looking at EPA guidelines, state implementation plans, IRPs, etc.
 - Trying to determine capital cost <u>and</u> O&M costs for compliance for specific plants or generic technologies.
- If you have resources you can recommend, or information you can pass on, it would be greatly appreciated!



