

Energy Resource Options study

11 March 2013





# Why the need for the Study?

- EPA
  - CSAPR/CAIR
  - MATS
  - Other
- Natural Gas
  - Change in cost
  - Perceived Politics
- Other Energy Options
  - MISO Market
  - Buy into a unit
  - Solar/Wind







### Study Objectives

- Identify applicable environ. rules and regulations
- Identify potential Solutions
- Consider the impacts on MSW that is processed into RDF and co-fired with coal today
- Cost out the options
- Economically model the options using forecasted costs
  - Long-term fuel projections
  - Ran sensitivities
- Final Recommendation made by COA staff will include consideration of our values







## Applicable Environ. Rules and Regulations

- Cross-state Air Pollution Rule (CSAPR)
  - SO<sub>2</sub> and NO<sub>x</sub>
  - Vacated
  - Under Clean Air Interstate Rule (CAIR)
  - Compliance Gap
    - met by purchasing allowances
    - Mix of control technologies and operating strategies



#### **CSAPR GAP Analysis**

		<u>Unit /</u>	<u> Unit #8</u>
Annual SO2	Reduction	34%	13%
Annual NOx	Reduction	62%	64%
Ozone NOx 1	Reduction	70%	60%





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## Milestone Dates & Actions EPA's SO2 and NOx Regulations

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	Date Regulation	Action	SO2/NOx Regulation
<b>2008</b> <sub>10</sub>	Date Regulation	Action	ŭ
2008 IQ 2Q			CAIR CAIR
	7/44/2000 CAID	Vacated by U.S. Court of Appeals - D.C. Circuit	
3Q	7/11/2008 CAIR	•	CAIR
4Q	12/23/2008 CAIR	Remanded back to EPA by the D.C. Circuit Court	CAIR
20091Q 2Q			CAIR CAIR
3Q			CAIR
4Q			CAIR
<b>2010</b> <sub>1Q</sub>			CAIR
2Q			CAIR
3Q	8/20/2010 CSAPR	Proposed Rule issued	CAIR
4Q	5/ <b>2</b> 5/ <b>2</b> 5 <b>25</b> /		CAIR
<b>2011</b> <sub>1Q</sub>			CAIR
2Q			CAIR
3Q	8/8/2011 CSAPR	Final Rule (effective 1/1/2013)	CAIR
4Q	12/30/2011 CSAPR	Rule stayed by U.S. Court of Appeals - D.C. Circuit	CAIR
<b>2012</b> <sub>1Q</sub>			CAIR
2Q	4/13/2012 CSAPR	Hearing re: CSAPR D.C. Circuit Court	CAIR
3Q	8/21/2012 CSAPR	CSAPR vacated & remanded back to EPA by Court	CAIR
4Q	10/5/2012 CSAPR	EPA petitioned the Court for an en banc rehearing	CAIR
<b>2013</b> <sub>1Q</sub>	1/24/2013 CSAPR	Court denied EPA's en banc petition	CAIR
2Q			
3Q			
4Q			





Active

## Applicable Environ. Rules and Regulations

- Mercury and Toxics Standard (MATS)
  - Mercury and Hazardous Air **Pollutants**
  - Must comply by 16 April 2015
    - Optional 4<sup>th</sup> year extension
    - Optional 5<sup>th</sup> year extension



MATS GAP Analysis

Mercury

Unit 7 74%

**Unit #8** 74%





# Milestone Dates & Actions EPA's Mercury Regulations

	Data Bagulatio	nn	tion	Active Mercury
	Date Regulation		tion	Regulation
<b>2008</b> <sub>1Q</sub>	2/8/2008 CAMR	CAMR Vacated		None
2Q				None
3Q				None
4Q				None
<b>2009</b> <sub>1Q</sub>				None
2Q				None
3Q				None
4Q				None
<b>2010</b> 1Q				None
2Q				None
3Q				None
4Q				None
<b>2011</b> <sub>1Q</sub>				None
2Q	5/3/2011 MATS	Proposed Rule		None
3Q				None
4Q				None
<b>2012</b> <sub>1Q</sub>	2/16/2012 MATS	Final Rule		None
2Q				None
3Q				None
4Q				None





# Milestone Dates & Actions EPA's Mercury Regulations

	Date	Regulation	Action	Active Mercury Regulation
<b>2013</b> 1Q	24.0		,	None
2Q				None
3Q				None
4Q				None
<b>2014</b> <sub>1Q</sub>				None
2Q				None
3Q				None
4Q				None
2015 <sub>1Q</sub>				
<b>2013</b> 1Q				None
2Q	4/16/201	5 MATS	Compliance	
3Q				
4Q				
<b>2016</b> <sub>1Q</sub>				
2Q	4/16/201	6 MATS	Additional Year for Compliance (Probable)	
2Q 3Q	4/10/2010	UNAIS	Additional real for compliance (Frobuble)	
3Q 4Q				
•				
<b>2017</b> <sub>1Q</sub>				
			Additional Year for Compliance (Remotely	
2Q	4/16/201	7 MATS	Possible)	
3Q	., 10, 201			
4Q				
+α				





Active Mercury

### Considered Energy Resource Plans

- **Coal Retrofit** continue operating one or both units on coal
- Natural Gas convert one or both existing coal units to natural gas
- **Retire** retire one or both coal units and replace the capacity with a new Combustion Turbine Generator (natural gas fired)
- Combination of these led to 16 distinct options







#### **Staff Process**

- Developed a Scope of Work
- Through Purchasing, issued a Request For Proposal
  - Team of Electric Services, Resource Recovery and City Manager evaluated
- Selected Black & Veatch
  - Strong engineering and construction skill set in electric production
  - Strategist program
    provided
    modeling/analysis of
    multiple scenarios
  - \\Netapp01\coashared\CITY COUNCIL MEETINGS\COUNCIL ACTION FORMS\March 11, 2013\COA Final Presentation 11Mar2013 draft 2.pptx







#### Next Steps

- Staff to review and analyze effect of new EPA proposed rule on coal options.
  - Likely will result in a new option(s).
- Finalize report and present to City Council
- Staff to make recommendation to City Council on preferred option.





