

STATE OF RHODE ISLAND AND PROVIDENCE
PLANTATIONS ENERGY FACILITY SITING BOARD

**In re: Ocean State Power, LLC
Upgrade to Steam Turbine**

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Docket No. SB-2022-XX

PETITION FOR
DECLARATORY ORDER

Ocean State Power, LLC

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Date: August 5, 2022

I. INTRODUCTION

In accordance with R.I. Gen. Laws § 42-35-8, Ocean State Power, LLC (“OSP”) petitions the Rhode Island Energy Facility Siting Board (“EFSB”) for a declaration that the replacement and upgrade of certain internal components in one half of OSP’s combined cycle electric generation facility in Harrisville, Rhode Island (the “Modification”) is not subject to the jurisdiction of the EFSB. The Modification does not require a license from the EFSB because it is not an alteration of a major energy facility.

The law does not require a license from the EFSB to upgrade a “major energy facility”¹ unless it results in an “alteration,” which the Energy Facility Siting Act (the “Act”) defines as:

a significant modification to a major energy facility, which, as determined by the board, will result in a significant impact on the environment, or the public health, safety, and welfare.

R.I. Gen. Laws § 42-98-3(b). Here, OSP’s proposed Modification is not an “alteration” because it will not result in a “significant impact on the environment, or public health, safety, and welfare.”

The Modification will not adversely impact the environment; the environmental impact will be positive. The Modification will result in an overall decrease in air emissions by improving the OSP facility’s existing pollution control equipment. Although the Modification will increase the facility’s generation capacity, it will reduce the facility’s “potential to emit” nitrogen oxides (“NOx”), carbon monoxide (“CO”), and volatile organic compounds (“VOCs”) and will not exceed emissions limits in the facility’s current air permit. The Modification also will result in lower annual greenhouse gas (“GHG”) emissions on an annualized basis. In fact, the Rhode Island Department of Environmental Management (“RIDEM”) issued a minor source air permit for the

¹ A “major energy facility” includes a facility “for the generation of electricity designed or capable of operating at a gross capacity of forty (40) megawatts or more[.]” R.I. Gen. Laws § 42-98-3(d).

Modification in May 2022, approving these improvements under the applicable air pollution control regulations.

The Modification also will not adversely impact public health, safety, or welfare. There are no impacts to the site or surrounding local area, wetlands, or wastewater discharges. Water use could slightly increase during peak electrical demand, but it will not exceed the current water use permit limitations. Further, the facility will not be louder or busier, and the Modification will not increase hazard risks from operations.

For these reasons, OSP respectfully requests that the EFSB issue a declaration that the Modification is not subject to EFSB jurisdiction because it is not an “alteration” of a “major energy facility” under the Act.

II. OVERVIEW OF THE MODIFICATION

A. Ocean State Power Facility Description and Setting

The OSP facility is a 560 Megawatt (“MW”), dual-fuel, combined cycle electric generating facility, which the EFSB approved for construction on October 25, 1988. *See* Final Decision and Order, *In re: Application of Ocean State Power filed January 13, 1987 to Site and Construct a Major Energy Facility*, Docket No. S.B. 87-1 (Oct. 25, 1988). The facility is composed of two power blocks arranged in phases. Phase 1 was commissioned in 1990, with Phase 2 following shortly thereafter in 1991. The facility is located approximately 25 miles northwest of Providence on an approximately 62-acre site. The main entrance from Sherman Farm Road is located on the west side of the site. The site is in a wooded area surrounded largely by undeveloped parcels of land. Eversource is the most significant landowner in the area surrounding the plant. The facility is approximately 1.5 miles from Spring Lake, the nearest body of water, and 3.4 miles from the

Blackstone River. The nearest occupied structure is approximately 250 yards away from the property boundary and 500 yards away from the generating facility.



Each phase of the facility includes two General Electric (“GE”) 7EA combustion turbines and one GE dual-pressure steam turbine. Each combustion turbine exhausts into its own heat recovery steam generator (“HRSG”), which in turn provides steam to the steam turbines for additional energy production, thereby increasing the overall efficiency of the facility. Each of the six turbines is coupled to an individual electric generator, which then connects to a 345kV high voltage transmission line through step-up transformers with disconnects and circuit breakers. The combustion turbines operate primarily on pipeline natural gas, but they also have the capability of running secondarily on #2 ultra-low sulfur diesel (“ULSD”) fuel.

B. The Proposed Modification

The proposed Modification applies to the Phase 2 equipment only, and thus it affects only one half of the facility. The Modification involves replacement of certain internal components of

the Phase 2 steam turbine, the addition of wet compression skirts for the combustion turbines, and modifications to the steam and combustion turbine generators. OSP expects the proposed Modification to increase the aggregate summer capability of the facility by 64MW, or approximately 12 percent of the total output. The Modification also will make the facility more energy efficient by increasing the electricity generated per standard unit of gas consumed, resulting in a better Standard Cubic Foot to Megawatt Hour (“SCF/MWh”) ratio. Additionally, the proposed Modification will not increase ULSD fuel usage.

OSP seeks to implement the Modification during the regular maintenance cycle, which typically occurs every ten years. The proposed Modification would occur during a preexisting regularly scheduled period for maintenance and inspection work planned for 2024. This previously planned maintenance work already will require full disassembly of the high-pressure (“HP”) and low-pressure (“LP”) sections of the steam turbine and will include regularly scheduled hot gas path inspections of the combustion turbines. OSP also will disassemble the electric generators as part of this work. The specific work that would occur to complete the Modification is set forth below.

1. Steam Turbine Upgrade

OSP’s existing steam turbine is an 88MW straight condensing steam turbine consisting of HP and LP sections coupled to a single electric generator. The steam turbine is a dual casing, one admission opening machine, which first receives high pressure steam into the HP section. Lower pressure steam exits the HP section and is directed to the LP section of the steam turbine with a double flow exhaust section into a condenser. The electric generator is rated to 126,000kVA at 13.8 kilovolts. The steam turbine Generator Step-Up Transformer (“GSU”) steps up the voltage to match the 345kV electric transmission grid.

The steam turbine modification consists of: (i) swapping out the existing HP section with a new and more efficient HP section, (ii) modifying internal components of the LP section and steam turbine generator, and (iii) changing the balance of plant to accommodate these changes. With these changes, the steam turbine generator will be able to utilize the full steam capability of the HRSGs, where historically the steam turbine was limited and made the overall steam cycle less efficient.

a. HP Section of Steam Turbine

HP steam production will increase due to the combustion turbine modifications and by removing the restrictions that have limited the duct burner output. The duct burners can then operate at their full design capacity.

The steam pressure to the HP section will increase by approximately 200 psi to 1375 psi, and the flow of steam will improve by 40%, from 750,000 lb/hr to 1,050,000 lb/hr. The increased HP steam flow will be used in the new, larger HP section. Although the new HP section of the steam turbine will be higher capability than the original, it will be located in the same position as the existing one.

b. LP Section of Steam Turbine and Generator

The existing LP section of the steam turbine and the electric generator are both capable of accommodating the increased steam flow and higher electric output subject to internal modifications. The existing LP casing and rotor will remain, but the first two stages of the LP rotor will be upgraded with new buckets and diaphragms to improve efficiency. New coupling hardware will also be installed for the connection between the existing LP rotor and generator rotor.

The existing steam turbine generator stator will be rewound and have new connection rings and a new end winding support system installed. The generator field will also be rewound with new

c-coil copper and have a new collector ring assembly and new bore copper installed. New coolers also will be installed to improve the cooling efficiency of the steam turbine generator.

c. Balance of Plant

The proposed Modification will require installation of larger HP steam piping and a new main steam combined stop and control valve to accommodate the increased steam flow from the HRSGs. Efficiency improvements also will be made to the auxiliary cooling system for the electric generator by adding a new heat exchanger. Additionally, a booster condensate pump will be installed to handle additional condensate flow resulting from the higher steam flow.

2. Combustion Turbine

In addition to regularly scheduled maintenance, the proposed Modification would add wet compression skirts to the combustion turbines. Wet compression injects water into the combustion turbine inlet, increasing mass flow through the turbine and thus increasing generator output. Wet compression is considered a peaking product and will be utilized only during peak demand periods.

Upgrades to the electric generators on the combustion turbines include a stator rewind with new optimized stator bars in addition to new optimized connection rings. The new design will reduce ongoing maintenance related to the electric generators. Additionally, new coolers will replace the existing coolers and improve the electric generators' cooling efficiency.

3. Pollution Control Equipment

The proposed Modification also includes improvements to the existing Selective Catalytic Reduction ("SCR") catalyst modules in Phase II to state of the art technology. The new custom-built catalyst modules will not only provide greater reductions in NO_x than the existing catalyst modules, but will also reduce CO and VOC emissions—which the existing catalyst modules are not

capable of reducing. These upgrades will *lower* turbine NOx emissions by 67%, CO emissions by 50%, and VOC emissions by 63% per unit of heat input to the turbine.²

III. ANALYSIS

The Modification does not require a license by the EFSB because is not an “alteration” under the Energy Facility Siting Act, R.I.G.L. § 42-98-3(b).

A. Standard of Review

The EFSB recently discussed the relevant standard for determining whether proposed projects are jurisdictional alterations in a proceeding initiated by Sea 3 Providence, LLC seeking a petition for a declaratory order on whether a proposed action or project constitutes an “alteration” under R.I.G.L. § 42-98-3(b). In its Decision and Order on the Sea 3 Providence, LLC petition, issued May 31, 2022, the EFSB explained the standard it applied to a petition for declaratory judgment that a modification to a major energy facility is not jurisdictional: “The Petitioner bears the burden of proof to show that there is no significant risk of impact, or if the risk is realized, that any such impact would not be significant.” Decision and Order, *In Re: Sea 3 Providence, LLC Petition for Declaratory Order Regarding the Rail Service Incorporation Project*, Docket No. SB-2021-03, (Order No. 153, May 31, 2022) at 25. The EFSB also concluded that the petitioner must meet this burden by “clear and convincing” evidence.³ *Id.* at 26.

² See State of Rhode Island Department of Environmental Management Office of Air Resources, Major Source Permit, *Ocean State Power*, RI-PSD-1 (dated May 31, 2022), which is attached to this petition as Exhibit 1.

³ The EFSB defined the “clear and convincing evidence” standard as requiring that the factfinder “must believe that the truth of the facts asserted is highly probable.” *In Re: Sea 3 Providence, LLC Petition for Declaratory Order Regarding the Rail Service Incorporation Project*, Docket No. SB-2021-03, (Order No. 153, May 31, 2022) at 26 (quoting *Parker v. Parker*, 103 R.I. 435, 442, 238 A.2d 57, 61 (1968)). The clear and convincing evidence standard does not require that the evidence negate all reasonable doubt or that the evidence must be uncontroverted.” *Cahill v. Morrow*, 11 A.3d 82, 88 n. 7 (R.I.2011) (quoting 29 Am.Jur.2d *Evidence* § 173 at 188–89 (2008)).

B. The Modification Will Not Create a (1) Significant Risk of an Adverse Impact on the Environment, Public Health, Safety or Welfare, or (2) a Significant Adverse Impact

The Modification will have only one direct impact on the environment, public health, safety and welfare: a positive impact on air quality. The Modification will result in an overall decrease in potentially harmful air emissions.

The OSP facility is subject to RIDEM's air pollution control regulations and has a Title V Operating Permit, which is a comprehensive air permit that governs all aspects of the facility's air emissions. The proposed Modification required OSP to obtain a so-called pre-construction "minor source" air permit. RIDEM approved the Modification and issued that permit on May 31, 2022 (*see* Exhibit 1). In issuing this "minor source" air permit, RIDEM evaluated the Modification's "potential to emit" ("PTE") air emissions and compared that to baseline actual emissions. RIDEM found that the Modification would not result in emissions that exceed the threshold levels that RIDEM defines as "a significant emissions increase," which would have triggered the requirement for a "major source" air permit. RIDEM approved the Modification as one that is not considered a "significant emissions increase" or "major modification" of air emission under its regulations. The "minor source" permit limits the facility's use of fuel on an annual basis. Additionally, the new permit requires stack testing to ensure that the facility remains in compliance with the new emissions limits. The "minor source" air permit contains provisions that require Phase II of the facility to operate within the new permit limits shown in Tables 3.1 (for operation on natural gas) and 3.2 (for operation on #2 fuel oil) below.

| Table 3.1 - Phase II Short Term Limit Comparison-NG, Turbine + Duct Burner | | |
|--|----------------------|------------------|
| Pollutant | Current Permit lb/hr | New Permit lb/hr |
| NOx | 75.40 | 16.81 |
| CO | 65.15 | 34.11 |
| SO2 | 4.09 | 3.04 |
| PM10/2.5 | 13.80 | 9.44 |
| VOC | 6.08 | 2.93 |
| NH3 | 54.00 | 20.74 |

| Table 3.2 - Phase II Short Term Limit Comparison-#2 Fuel Oil , Turbine Only | | |
|---|----------------------|------------------|
| Pollutant | Current Permit lb/hr | New Permit lb/hr |
| NOx | 81.60 | 44.70 |
| CO | 81.70 | 65.31 |
| SO2 | 1.85 | 1.75 |
| PM10/2.5 | 23.00 | 13.80 |
| VOC | 10.30 | 4.68 |
| NH3 | 50.30 | 16.55 |

RIDEM also reduced the number of hours per year that Phase 2 can operate by imposing a fuel throughput limit. To better align with the needs of the grid in the current energy transition period, Phase 2 will better utilize the post-Modification capacity during periods of peak demand.

As shown in Table 3.3, the Modification will significantly reduce PTE for all criteria pollutant emissions, lower overall annual emissions, and decrease GHG emissions.

| Table 3.3 - Phase II Emissions Reduction vs. Current PTE | | | |
|--|-------------|----------------|-------------|
| Pollutant | Current PTE | New Permit PTE | % Reduction |
| NOx | 669.65 | 60.51 | 91 |
| CO | 595.13 | 122.8 | 79 |
| SO2 | 35.83 | 10.95 | 69 |
| PM10/2.5 | 200.6 | 27.4 | 86 |
| VOC | 53.29 | 10.55 | 80 |
| NH3 | 473.04 | 74.66 | 84 |
| Total HAP | 7.79 | 2.95 | 62 |
| Lead | 0.03 | 0.004 | 87 |

The Modification also is consistent with the recently enacted Act on Climate. The Act on Climate directs state agencies to exercise their existing powers in furtherance of the General Assembly's policies on "climate change mitigation, adaptation, and resilience." R.I. Gen. Laws § 42-6.2-8. Here, the Modification furthers these policies by reducing overall GHG emissions due to the increased efficiency of the steam cycle post-Modification. This CO₂ decrease is detailed in the Black and Veatch study titled "Ocean State Power CO₂ Emissions Summary." A copy of this study is attached to this petition as Exhibit 2. Although CO₂ emissions will slightly increase during peak demand periods, CO₂ emissions will decrease on a tons/MWH basis. As new renewables penetrate the market, CO₂ emissions from OSP will continue to decrease on an annualized basis.

The Modification presents no other potential risk of impacts on the environment, or to public health, safety and welfare. The Modification will not increase or change the facility's footprint or boundaries. The Modification will not increase the number of permanent employees, so it will not impact local traffic. The Modification will not impact the facility's zero-liquid-discharge system for process wastewater.

OSP will continue to operate the facility within its existing water use permit. The Modification will increase water usage minimally when wet compression is in service, which is expected to occur only at peak demand times during the summer months. This increase will not impact the environment or the local water supply infrastructure. The Modification will not impact wetlands or drainage at or near the site. The Modification also will not impact ambient noise levels. There will be no change to the operation of the plant due to the Modification.

The only impacts that will extend outside the facility are the emissions reductions described above. Therefore, the Modification will not adversely impact the surrounding community; there is no risk of impact to public safety, health or welfare.⁴

C. The Modification Supports the Transition to Renewable Energy Generation

Improving the flexibility and efficiency of power generation plants like the OSP facility is critical to support the transition to renewable energy and achieve net zero emissions by 2050. In the years to come, as renewable resources like wind and solar produce ever increasing amounts of clean energy, there will be periods when the regional grid operator, ISO New England (“ISO-NE”), will need energy storage and efficient natural gas generation to fill the gaps between consumer demand for electricity and the production of clean energy. In its 2022 Regional Electricity Outlook, ISO-NE noted that it “remains certain that some resources will be necessary to balance renewable energy on a routine basis.”⁵

For example, balancing resources will be needed to assist with sustained winter cold-snaps or with hour-to-hour renewable integration. Cold snaps are a fact of life in New England, and, although incremental renewable generation can help reduce the amount of energy that must be sourced from stored fuels, those renewable resources will not eliminate the need for balancing resources to support renewable electric generation to meet the increased electric demand triggered by those cold snaps. A recent study concluded that up to 32 GW of balancing resources would be

⁴ In addition to the favorable emissions impacts, the Modification will provide a financial benefit for the community. Under the existing tax agreement between OSP and the Town of Burrillville, OSP will pay approximately \$250,000 more annually in taxes to the Town due to the increased plant capacity from the Modification.

⁵ On the Horizon, 2022 Regional Electricity Outlook, ISO New England at 15. An excerpted copy of the relevant portions of this report is attached to this petition as Exhibit 3.

needed to cover cold-snap weeks by 2050, noting: “the biggest reliability challenge by 2050 is multi-day periods of low renewable energy production.”⁶

Balancing resources also will be required to help manage renewable output on an hour-to-hour basis. In California, the so-called “duck-curve” – the late afternoon period when solar generation reduces as the sun sets – already strains the system.⁷ Solar is not *causing* these problems, but additional resources are necessary to ensure reliable integration of the clean power. As more renewable generation comes online, the Modification will make the OSP facility a better balancing resource with greater peak demand capacity that can respond quickly to changes in generation supply.

With the current absence of large-scale battery storage or other storage mechanisms in the ISO-NE market, natural gas-fired plants such as the OSP facility must bridge the gap when renewable generation is unavailable or insufficient. Studies conducted by ISO-NE, the Commonwealth of Massachusetts, and the State of Connecticut, all indicate that natural-gas fired power plants, such as the OSP facility, will need to balance the system for decades to come. For example, the ISO-NE Pathways study indicates that the region requires approximately 20 GW of gas-combined cycles or gas turbines both today and in 2040.⁸ The Massachusetts Decarbonization Roadmap and Connecticut Integrated Resources Plan reach the same conclusion using different

⁶ Energy + Environmental Economics & Energy Futures Initiative, Net-Zero New England: Ensuring Electric Reliability in a Low-Carbon Future (November 2020) at 43-48. An excerpted copy of the relevant portions of this report is attached to this petition as Exhibit 4.

⁷ California Independent System operator, California Public Utilities Commission, & California Energy Commission, “Preliminary Root Cause Analysis: Mid-August 2020 Heat Storm” (Oct. 6, 2020) at 5-7. An excerpted copy of the relevant portions of this report is attached to this petition as Exhibit 5.

⁸ Analysis Group, Pathways Study: Evaluation of Pathways to a Future Grid, Schatzki, Todd, Ph.D, et al (April 2022) at 42-46. An excerpted copy of the relevant portions of this report is attached to this petition as Exhibit 6.

modeling approaches.⁹ Although these natural gas resources should be decreasing in *energy* production significantly over the next two decades, their *capacity* remains critical for system reliability.¹⁰ And, it is possible that, in the future, these turbines could rely on a renewable natural gas or hydrogen for their occasional run periods.

Additionally, the ISO-NE power market continues to incentivize generators like OSP to make improvements like those in the proposed Modification. The incremental capacity from the proposed Modification cleared the ISO-NE Forward Capacity Auction #15 for the 2024/2025 capacity year.¹¹

In summary, the Modification will further strengthen the OSP facility's ability to serve as a balancing resource by providing peaking products, such as wet compression and increased duct burner capacity during peak demand periods, while still using the existing OSP infrastructure.

IV. CONCLUSION

The EFSB should find that the OSP has demonstrated that (1) there is no significant risk that the Modification will adversely impact the environment, or the public health, safety and welfare and (2) any adverse impact will not be significant. OSP respectfully requests that the EFSB issue a Declaratory Order pursuant to R.I. Gen Laws § 42-35-8 that OSP's Modification does not require a license from the EFSB because it is not an alteration of a major energy facility.

⁹ Evolved Energy Research, Energy Pathways to Deep Decarbonization: A Technical Report of the Massachusetts 2050 Decarbonization Roadmap Study (December 2020) at Figure 53. An excerpted copy of the relevant portions of this report is attached to this petition as Exhibit 7. Connecticut Department of Energy and Environmental Protection, Integrated Resources Plan: Pathways to achieve a 100% zero carbon electric sector by 2040 (October 2021) at Appendix A-3, Figures 1-2. An excerpted copy of the relevant portions of this report is attached to this petition as Exhibit 8.

¹⁰ E3 & EFI estimate the capacity factor of gas units will fall from around 30% to 10% by 2050, *see* Exhibit 4 at 48, while the ISO-NE Pathway's study shows comparable reductions by 2040. *See* Exhibit 6 at 52-53.

¹¹ *See* ISO New England Inc., Docket No. ER21-____-000, Forward Capacity Auction Results Filing (February 26, 2021) at 30. A copy of the filing is attached to this petition as Exhibit 9.

OCEAN STATE POWER, LLC
By its Attorneys,

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DATED: August 5, 2022

EXHIBIT 1



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR RESOURCES
235 Promenade Street
Providence, Rhode Island 02908

31 May 2022

Mr. Jeffrey Stewart
Facility Manager
Ocean State Power
1575 Sherman Farm Road
Harrisville, RI 02830

Dear Mr. Stewart:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the proposal to upgrade turbines and install new air pollution control equipment at your facility located at 1575 Sherman Farm Road, Harrisville , RI 02830.

Enclosed is a revised major source permit issued pursuant to our review of your request (RI-PSD-1).

The issuance of this major source permit qualifies as an Off-Permit Change for your Title V Operating Permit under Operating Permits, 250-RICR-120-05-29.15.2. This minor source permit will be incorporated into your operating permit at the time of renewal or re-opening.

A copy of this major source permit and a copy of your application should be maintained with your operating permit at all times until this permit is incorporated into your operating permit. In addition, as stated in 250-RICR-120-05-29.15.2(D), the permit shield in Section II of your operating permit shall not apply to this permit until it is incorporated into your operating permit.

If there are any questions concerning this permit, please contact me by telephone at 401-222-2808, extension 2777154 or by email at jikku.samuel@dem.ri.gov.

Sincerely,

Jikku Samuel
Senior Air Quality Specialist
Office of Air Resources

STATE OF RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MAJOR SOURCE PERMIT

OCEAN STATE POWER

RI-PSD-1

Pursuant to the provisions of Air Pollution Control Permits, 250-RICR-120-05-9, this major source permit is issued to:

Ocean State Power

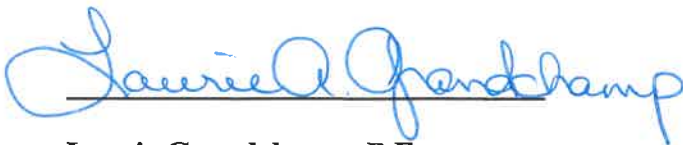
For the following:

Proposal for upgrading Turbines 3 and 4 in Power Block 2 to increase electric power output, the installation of a Cormetech CMHCDMPTM SCR/oxidation catalyst, and new emission limits for Turbines 3 and 4, including PM-2.5

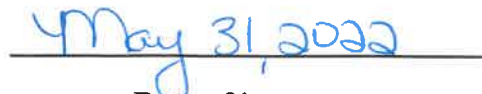
Located at:

1575 Sherman Farm Road, Harrisville

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Ocean State Power* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.



Laurie Grandchamp, P.E.,
Chief Office of Air Resources



Date of issuance

**STATE OF RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES**

Permit Conditions and Emissions Limitations

OCEAN STATE POWER

**RI - PSD - 1
(Revised May 2022)**

A. Emission Limitations - Turbines

1. Natural Gas Firing – Turbines 1 and 2

a. Nitrogen oxides (as nitrogen dioxide (NO₂))

1. The concentration of nitrogen oxides discharged to the atmosphere from each flue shall not exceed 9 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of nitrogen oxides discharged to the atmosphere from each flue shall not exceed 37.4 lbs/hr. when both turbines in a two-turbine combined cycle system are operating, nor exceed 53.0 lbs/hr. when only one turbine in that two turbine combined cycle system is operating.

b. Carbon Monoxide (CO)

1. The concentration of carbon monoxide discharged to the atmosphere from each flue shall not exceed 20 ppmv, on a dry basis, corrected to 15 percent O₂ (24 hour block average beginning at 0800).
2. The emission rate of carbon monoxide discharged to the atmosphere from each flue shall not exceed 46.8 lbs/hr. when both turbines in a two-turbine combined cycle system are operating, nor exceed 64.8 lbs/hr. when only one turbine in that two turbine combined cycle system is operating.

c. Sulfur Dioxide (SO₂)

1. The emission rate of sulfur dioxide discharged to the atmosphere from each flue shall not exceed 0.0027 lbs per million BTU heat input (HHV) or a maximum of 3.1 lbs/hr., whichever is more stringent, when both turbines in a two turbine combined cycle system are operating.
2. The emission rate of sulfur dioxide discharged to the atmosphere from each flue shall not exceed 0.0027 lbs per million BTU heat input (HHV) or a maximum of 4.2 lbs/hr., whichever is more stringent, when only one turbine in a two turbine combined cycle system is operating.

d. Particulate Matter

1. The emission rate of particulate matter discharged to the atmosphere from each flue shall not exceed 0.01 lbs per million BTU heat input (HHV) or a maximum of 11.5 lbs/hr, whichever is more stringent, when both turbines in a two turbine combined cycle system are operating.
2. The emission rate of particulate matter discharged to the atmosphere from each flue shall not exceed 0.01 lbs per million BTU heat input (HHV) or a maximum of 18 lbs/hr., whichever is more stringent, when only one turbine in a two turbine combined cycle system is operating.

e. Total Nonmethane Hydrocarbons (NMHC)

1. The concentration of total nonmethane hydrocarbons discharged to the atmosphere from each flue shall not exceed 4.1 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from each flue shall not exceed 4.7 lbs/hr. when both turbines in a two turbine combined cycle system are operating, nor exceed 7.2 lbs/hr. when only one turbine in that two turbine combined cycle system is operating.

f. Ammonia (NH₃)

1. The concentration of ammonia discharged to the atmosphere from each flue shall not exceed 30 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of ammonia discharged to the atmosphere from each flue shall not exceed 54 lbs/hr. when both turbines in a two-turbine combined cycle system are operating, nor exceed 65 lbs/hr. when only one turbine in that two turbine combined cycle system is operating.

2. Fuel Oil Firing – Turbines 1 and 2

a. Nitrogen Oxides (as nitrogen dioxide (NO₂))

1. The concentration of nitrogen oxides discharged to the atmosphere from each flue shall not exceed 18 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average)
2. The emission rate of nitrogen oxides discharged to the atmosphere from each flue shall not exceed 81.6 lbs/hr.
3. The total quantity of nitrogen oxides discharged to the atmosphere from the four combustion turbines combined, during discretionary oil firing, shall not exceed 4000 lbs per calendar month based upon a 12-month rolling average.

b. Carbon Monoxide (CO)

1. The concentration of carbon monoxide discharged to the atmosphere from each flue shall not exceed 30 ppmv, on a dry basis, corrected to 15 percent O₂ (24 hour block average beginning at 0800).
2. The emission rate of carbon monoxide discharged to the atmosphere from each flue shall not exceed 81.7 lbs/hr.

c. Sulfur Dioxide (SO₂)

1. The owner/operator shall not use fuel oil in any turbine or store fuel oil for use in any turbine with a sulfur content greater than 15 ppm by weight.
2. The emission rate of sulfur dioxide discharged to the atmosphere from each flue shall not exceed 1.85 lbs/hr.

d. Particulate Matter

The emission rate of particulate matter discharged to the atmosphere from each flue shall not exceed 0.01 lbs per million BTU heat input (HHV) or a maximum of 11.5 lbs/hr whichever is more stringent.

e. Total Nonmethane Hydrocarbons (NMHC)

1. The concentration of total nonmethane hydrocarbons discharged to the atmosphere from each flue shall not exceed 7.2 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from each flue shall not exceed 10.3 lbs/hr.

f. Ammonia (NH₃)

1. The concentration of ammonia discharged to the atmosphere from each flue shall not exceed 30 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of ammonia discharged to the atmosphere from each flue shall not exceed 50.3 lbs/hr.

3. Natural Gas Firing – Turbines 3 and 4 without Duct Burners Firing

a. Nitrogen oxides (as nitrogen dioxide (NO₂))

1. The concentration of nitrogen oxides discharged to the atmosphere from each flue shall not exceed 3 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).

2. The emission rate of nitrogen oxides discharged to the atmosphere from each turbine shall not exceed 12.75 lbs/hr.

b. Carbon Monoxide (CO)

1. The concentration of carbon monoxide discharged to the atmosphere from each flue shall not exceed 10 ppmv, on a dry basis, corrected to 15 percent O₂ (24 hour block average beginning at 0800).
2. The emission rate of carbon monoxide discharged to the atmosphere from each turbine shall not exceed 25.88 lbs/hr.

c. Sulfur Dioxide (SO₂)

The emission rate of sulfur dioxide discharged to the atmosphere from each turbine shall not exceed 0.002 lbs per million BTU heat input (HHV) or a maximum of 2.31 lbs/hr, whichever is more stringent.

d. Particulate Matter (PM-10/PM-2.5)

The emission rate of particulate matter discharged to the atmosphere from each turbine shall not exceed 0.005 lbs per million BTU heat input (HHV) or a maximum of 5.77 lbs/hr, whichever is more stringent.

e. Total Nonmethane Hydrocarbons (NMHC)

1. The concentration of total nonmethane hydrocarbons discharged to the atmosphere from each flue shall not exceed 1.5 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from each turbine shall not exceed 2.22 lbs/hr.

f. Ammonia (NH₃)

1. The concentration of ammonia discharged to the atmosphere from each flue shall not exceed 10 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of ammonia discharged to the atmosphere from each turbine shall not exceed 15.73 lbs/hr.

4. Fuel Oil Firing – Turbines 3 and 4 without Duct Burners Firing

a. Nitrogen Oxides (as nitrogen dioxide (NO₂))

1. The concentration of nitrogen oxides discharged to the atmosphere from each turbine shall not exceed 10 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average)
2. The emission rate of nitrogen oxides discharged to the atmosphere from each turbine shall not exceed 44.70 lbs/hr.
3. The total quantity of nitrogen oxides discharged to the atmosphere from the four combustion turbines combined, during discretionary oil firing, shall not exceed 4000 lbs per calendar month based upon a 12-month rolling average.

b. Carbon Monoxide (CO)

1. The concentration of carbon monoxide discharged to the atmosphere from each flue shall not exceed 24 ppmv, on a dry basis, corrected to 15 percent O₂ (24-hour block average beginning at 0800).
2. The emission rate of carbon monoxide discharged to the atmosphere from each turbine shall not exceed 65.31 lbs/hr.

c. Sulfur Dioxide (SO₂)

1. The owner/operator shall not use fuel oil in any turbine or store fuel oil for use in any turbine with a sulfur content greater than 15 ppm by weight.
2. The emission rate of sulfur dioxide discharged to the atmosphere from each turbine shall not exceed 1.75 lbs/hr.

d. Particulate Matter (PM-10/PM-2.5)

The emission rate of particulate matter discharged to the atmosphere from each turbine shall not exceed 0.012 lbs per million BTU heat input (HHV) or a maximum of 13.80 lbs/hr, whichever is more stringent.

e. Total Nonmethane Hydrocarbons (NMHC)

1. The concentration of total nonmethane hydrocarbons discharged to the atmosphere from each flue shall not exceed 3 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from each flue shall not exceed 4.68 lbs/hr.

f. Ammonia (NH₃)

1. The concentration of ammonia discharged to the atmosphere from each flue shall not exceed 10 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average).
2. The emission rate of ammonia discharged to the atmosphere from each flue shall not exceed 16.55 lbs/hr.

5. Co-firing - Natural Gas and Oil without Duct Burners Firing

During periods when the combustion turbine is firing natural gas and fuel oil simultaneously, the emission limitation for nitrogen oxides, carbon monoxide, sulfur dioxide, particulate matter, total nonmethane hydrocarbons and ammonia, shall be determined by the following equation:

$$E_{co} = \frac{(E_{gas})(H_{gas}) + (E_{oil})(H_{oil})}{H_{gas} + H_{oil}}$$

where:

E_{co} = emission limitation (ppm, lb/hr or lb/MMBTU) during co-firing of natural gas and fuel oil

E_{gas} = emission limitation (ppmv, lb/hr, or lb/MMBTU) during natural gas firing

H_{gas} = heat input from the combustion of natural gas (MMBTU)

E_{oil} = emission limitation (ppmv, lb/hr, or lb/MMBTU) during fuel oil firing

H_{oil} = heat input from the combustion of fuel oil (MMBTU)

B. Emission Limitations - Duct Burners for Turbines 1 and 2

1. Natural Gas Firing

a. Nitrogen Oxides (as nitrogen dioxide (NO₂))

The emission rate of nitrogen oxides from each duct burner shall not exceed 0.1 lbs per million BTU heat input (HHV) or a maximum of 38 lbs/hr., whichever is more stringent.

b. Particulate Matter

The emission rate of particulate matter from each duct burner shall not exceed 0.03 lbs per million BTU heat input (HHV) or a maximum of 11.4 lbs/hr., whichever is more stringent.

c. Sulfur dioxide (SO₂)

The emission rate of sulfur dioxide from each duct burner shall not exceed 0.2 lbs per million BTU heat input (HHV) or a maximum of 76 lbs/hr., whichever is more stringent.

C. Emission Limitations - Duct Burners for Turbines 3 and 4

1. Natural Gas Firing

a. Nitrogen Oxides (as nitrogen dioxide (NO₂))

The concentration of nitrogen oxides discharged to the atmosphere from each duct burner shall not exceed 3 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average), or a maximum of 4.06 lb/hr, whichever is more stringent.

b. Carbon Monoxide (CO)

The concentration of CO discharged to the atmosphere from each duct burner shall not exceed 10 ppmv, on a dry basis, corrected to 15 percent O₂ (24-hour block average beginning at 0800), or a maximum of 8.23 lb/hr, whichever is more stringent.

c. Sulfur dioxide (SO₂)

The emission rate of sulfur dioxide from each duct burner shall not exceed 0.002 lbs per million BTU heat input (HHV) or a maximum of 0.73 lbs/hr, whichever is more stringent.

d. Particulate Matter (PM-10/PM-2.5)

The emission rate of particulate matter from each duct burner shall not exceed 0.01 lbs per million BTU heat input (HHV) or a maximum of 3.67 lbs/hr, whichever is more stringent.

e. Total Nonmethane Hydrocarbons (NMHC)

The concentration of NMHC discharged to the atmosphere from each duct burner shall not exceed 1.5 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average), or a maximum of 0.71 lb/hr, whichever is more stringent.

f. Ammonia (NH₃)

The concentration of NH₃ discharged to the atmosphere from each duct burner shall not exceed 10 ppmv, on a dry basis, corrected to 15 percent O₂ (1 hour average), or a maximum of 5.00 lb/hr, whichever is more stringent.

D. Emissions Limitations for Turbines 3 and 4 with Duct Burners Firing

1. Natural Gas Firing

a. Nitrogen Oxides (as nitrogen dioxide (NO₂))

Total emissions of nitrogen oxides from Turbines 3 and 4 and associated duct burners shall not exceed 60.51 tons in any 12-month period.

b. Carbon Monoxide (CO)

Total emissions of CO from Turbines 3 and 4 and associated duct burners shall not exceed 122.80 tons in any 12-month period.

c. Sulfur dioxide (SO₂)

Total emissions of SO₂ from Turbines 3 and 4 and associated duct burners shall not exceed 10.95 tons in any 12-month period.

d. Particulate Matter (PM-10/PM-2.5)

Total emissions of particulate matter from Turbines 3 and 4 and associated duct burners shall not exceed 27.40 tons in any 12-month period.

e. Total Nonmethane Hydrocarbons (NMHC)

Total emissions of NMHC from Turbines 3 and 4 and associated duct burners shall not exceed 10.55 tons in any 12-month period

E. Operating Requirements

1. Total natural gas use for Turbines 3 and 4 will be limited to 10,950,000 MMBtu per 12-month rolling period. If the duct burners are used, or if fuel oil is used in the turbines, natural gas usage in the turbines for the turbines shall be limited as follows:

$$NG_{\text{Turbines 3-4}} = \frac{54,800 - Oil_{\text{Turbines}} \times 0.140 \times A - NG_{\text{duct burners 3-4}} \times B}{C}$$

Where:

NG_{Turbines 3-4}: Maximum quantity of natural gas in MMBtu that may be burned in Turbines 3 and 4 combined over any consecutive 12-month period, excluding duct burners

Oil_{Turbines 3-4}: Fuel oil in gallons burned in Turbines 3 and 4 combined during the 12-month period

NG_{duct burners 3-4}: Natural gas in MMBtu that is burned in the duct burners associated with Turbines 3 and 4 combined during the 12-month period.

A: PM-2.5 emission rate in lb/MMBtu for oil firing in Turbines 3 and 4 or other value determined by stack testing.

B: PM-2.5 emission rate in lb/MMBtu for natural gas firing in Turbines 3 and 4 or other value determined by stack testing.

C: PM-2.5 emission rate in lb/MMBtu for natural gas firing in Turbines 3 and 4 or other value determined by stack testing.

2. Oil use, for the combustion turbines, shall be limited to that needed to maintain oil system readiness and times when natural gas is unavailable and, during the period 1 October to 30 April, on a discretionary basis as limited by this permit. This limitation on discretionary oil burning shall not apply to oil burned when natural gas is unavailable or when operating to maintain oil system readiness. Maintenance of oil system readiness is limited to burning oil for the purposes of ensuring adequate fuel flow, monitoring and adjusting operating parameters and testing emissions.

Natural gas shall be deemed unavailable only in cases of interruption in supply or transportation resulting from equipment failure, regulatory actions or interruption of supply outside of the control of the owner/operator. Natural gas shall be deemed unavailable during instances where the gas pressure in the gas pipeline drops below 350 psig at the plant boundary. Operation during gas pipeline low pressure incidents shall follow the procedures in Condition K.1 - K.5.

Natural gas shall be deemed unavailable if:

- a. ISO-New England has declared a "Cold Weather Event" pursuant to Market Rule 1, Appendix H, "Operations During Cold Weather Conditions". The permittee may utilize fuel oil for each Operating Day (12AM-12PM) that this condition exists; or,
- b. ISO-New England has declared a "Cold Weather Watch" or a "Cold Weather Warning" pursuant to Market Rule 1, Appendix H, "Operations During Cold Weather Conditions" and either ISO-New England has forecast ISO New England Operating Procedure No. 4 conditions in its Morning Report or as revised/updated during the Operating Day, or has taken any action under ISO New England Operating Procedure No. 4. The owner/operator may utilize fuel oil for the 24-hour period between issuance of the Morning Reports (9AM Day 1 to 9 AM Day 2) that this condition exists.

Natural gas shall not be deemed unavailable on the basis of any increase in the cost of supply or transportation or allocation of available natural gas to other facilities within the control of the owner/operator.

If the primary natural gas supply is unavailable, the owner/operator will make all reasonable efforts to promptly obtain other natural gas supplies via the Tennessee or Algonquin pipelines.

If natural gas is unavailable, the owner/operator may utilize fuel oil, with a sulfur content of 15 ppm or less by weight, as a replacement fuel.

3. In no event shall the hours of operation on oil exceed 1200 hours per turbine in any consecutive 12-month period for conditions where natural gas is deemed unavailable.
4. The duct burners shall be fired with natural gas only.
5. The natural gas combusted by the duct burners associated with Turbines 3 and 4 shall be limited to 1,100,000 MMBtu for any consecutive 12-month period.
6. Visible emissions from any stack at this facility shall not exceed 10% opacity except for a period or periods aggregating no more than three minutes in any one hour.
7. The owner/operator shall limit the combined quantity of fuel oil combusted during discretionary oil burning to 4,539,000 gallons or less for any consecutive 12-month period in all 4 burners and 2,269,500 gallons or less for any consecutive 12-month period in Turbines 3 and 4.

F. Continuous Monitors

1. Continuous emission monitoring systems (CEMS) shall be installed, operated and maintained for opacity, nitrogen oxides, carbon monoxide and oxygen.
2. The continuous monitors must satisfy EPA performance specifications in 40 CFR 60, Appendix B.
3. Performance specifications, monitor location, calibration and operating procedures and quality assurance procedures for each monitor must be submitted to the Office of Air Resources for review and approval at least 180 days prior to expected start-up.
4. All data shall be monitored and recorded continuously.
5. Natural gas and fuel oil flows to each turbine and the duct burners shall be continuously measured and recorded.
6. A method for monitoring and recording ammonia concentrations in the turbine flue gases shall be proposed for the Office of Air Resources' approval and implementation.
7. Catalyst bed temperature shall be continuously measured and recorded.
8. The facility shall have the capability of transmitting all of the collected continuous monitoring data to the Office of Air Resources' office via a telemetry system. The owner/operator must provide all of the necessary funds for installation and operation of this equipment. A plan for accomplishing this must be submitted to the Office of Air Resources for review and approval prior to installation of the equipment and at least 180 days prior to expected start-up. This plan shall also define procedures to test and protect the integrity of transmitted data.

G. Stack testing

1. Within 180 days of start-up, initial performance testing shall be conducted for Turbines 3 and 4. Performance testing shall be conducted for nitrogen oxides, carbon monoxide, particulate matter (PM-10 and PM-2.5), non-methane hydrocarbons, sulfur dioxide, and ammonia.
2. A stack testing protocol shall be submitted to the Office of Air Resources for review and approval prior to the performance of any stack tests. The owner/operator shall provide the Office of Air Resources at least 60 days prior notice of any performance test.
3. All test procedures used for stack testing shall be approved by the Office of Air Resources prior to the performance of any stack tests.
4. The owner/operator shall install any and all test ports or platforms necessary to conduct the required stack testing, provide safe access to any platforms and provide the necessary utilities for sampling and testing equipment.
5. Initial performance testing shall be conducted when burning natural gas and when burning fuel oil. All testing shall be conducted under operating conditions deemed acceptable and representative for the purpose of assessing compliance with the applicable emission limitation.
6. A final report of the results of stack testing shall be submitted to the Office of Air Resources no later than 45 days following completion of the testing.
7. All stack testing must be observed by the Office of Air Resources or its authorized representatives to be considered acceptable.

H. Recordkeeping and Reporting

1. The owner/operator shall maintain a record of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for each continuous monitor.
2. The owner/operator shall, on a monthly basis, no later than five (5) business days after the first of the month, determine the total quantity of nitrogen oxides discharged to the atmosphere from the four combustion turbines combined, and Turbines 3 and 4 combined, during discretionary oil burning, for the previous month. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
3. The owner/operator shall, on a monthly basis, no later than five (5) business days after the first of the month, determine the total quantity of fuel oil combusted during discretionary oil burning for the previous month. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
4. The owner/operator shall notify the Office of Air Resources, in writing, after an exceedance of any emission limitation is discovered. This notification shall be made within five (5) days of the exceedance. Notification shall be provided on forms furnished by the Office of Air Resources and must provide all of the information requested on the form.

5. The owner/operator shall notify the Office of Air Resources, in writing, after the discovery that a continuous emission monitor has malfunctioned. This notification shall be made within five (5) days of when the continuous emission monitor malfunctioned. Notification shall be provided on forms furnished by the Office of Air Resources and must provide all of the information requested on the form.
6. The owner/operator shall notify the Office of Air Resources, in writing, whenever the combined quantity of fuel oil combusted during discretionary oil burning exceeds 4,539,000 gallons for any consecutive 12-month period or 2,269,500 gallons for any consecutive 12-month period for Turbines 3 and 4.
7. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules or regulations.
8. The owner/operator shall maintain the following records for each turbine:
 - a. The hours of operation, including any start up, shut down or malfunction in the operations of the facility.
 - b. The date, start time, end time and amount of fuel used for any period when fuel oil is burned. Records must indicate whether fuel oil was burned under discretionary oil burning, during the unavailability of natural gas or to maintain oil system readiness.
 - c. If co-firing natural gas and fuel oil, the heat input (MMBTU) from the combustion of each fuel.
 - d. The calculated emission limitations for each pollutant when co-firing.
 - e. Any malfunction of the air pollution control system.
9. The owner/operator shall notify the Office of Air Resources of the anticipated date of the initial start-up not more than 60 days nor less than 30 days prior to such date.
10. The owner/operator shall notify the Office of Air Resources in writing of the date construction of the facility commenced no later than 30 days after such date.
11. The owner/operator shall notify the Office of Air Resources in writing of the date of actual initial start-up no later than fifteen days after such date.
12. The owner/operator shall notify the Office of Air Resources in writing of any physical or operational change to the facility which would:
 - a. Change the representation of the facility in the application.
 - b. Alter the applicability of any state or federal air pollution rules or regulations.
 - c. Result in the violation of any terms or conditions of this permit.

d. Qualify as a modification under 250-RICR-120-05-9.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change on the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

13. The owner/operator shall notify the Office of Air Resources in writing of the date upon which initial performance testing of the continuous emission monitors commences at least 30 days prior to such date.

14. The owner/operator shall notify the Office of Air Resources prior to burning fuel oil in any turbine. Such notification shall include:

- a. The date and time fuel oil burning is expected to commence
- b. The reasons for the fuel oil burning (unavailability of natural gas or discretionary oil burning)
- c. The anticipated length of time fuel oil will be burned

This requirement for prior notification does not apply to those times when oil is burned to maintain oil system readiness

15. The owner/operator shall submit a written report of excess emissions as measured by a continuous emission monitor for every calendar quarter. All quarterly reports shall be received no later than 30 days following the end of each calendar quarter and shall include the following information:

- a. The date and time of commencement and completion of each time period of excess emissions and the magnitude of the excess emissions.
- b. Identification of the suspected reason for the excess emissions and any corrective action taken.
- c. The date and time period any continuous emission monitor was inoperative, except for zero and span checks and the nature of system repairs or adjustments.

When none of the above items have occurred, such information shall be stated in the report.

16. All records required in this permit shall be maintained for a minimum of three years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.
17. Deviations from permit conditions shall be reported to the Office of Air Resources, in writing, within five (5) business days of the deviation. Reports shall describe the probable cause of such deviations and any corrective actions or preventative measures taken.

I. Other Permit Conditions

1. There shall be no by passing of the air pollution control equipment during start-up, operation or shutdown. Ammonia will not be injected during start-up or shutdown unless the catalyst bed is at, or above, the manufacturer's specified minimum operating temperature.
2. An operation and maintenance plan for the facility must be submitted to the Office of Air Resources at least 180 days prior to start-up of the facility.
3. The facility shall be designed, constructed and operated consistent with the representation of the facility in the PSD permit application and the minor modification application received by Office of Air Resources on November 3, 2021.
4. Except for the circumstances described in paragraph a. below, a malfunction of any air pollution control equipment that would result in the exceedance of any emission limitation in this permit will necessitate the shutdown of the unit(s) which would cause the exceedance. The unit(s) must remain shutdown until the malfunction has been identified and corrected.

A shutdown will not be necessitated under the following circumstances:

- a. If during a malfunction that would cause an exceedance of any applicable 1-hour average emission limitation, the emissions, when averaged over an 8-hour period beginning with the hour in which the malfunction occurred, do not exceed the applicable limitation.
5. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
6. The owner/operator shall have each delivery of fuel oil analyzed for sulfur content. The fuel oil must be sampled and analyzed according to ASTM methods which have the prior approval or are required by the Director. Records of the fuel oil analyses shall be maintained by the owner/operator.
7. This facility is subject to the requirements of the Federal New Source Performance Standards 40 CFR 60, Subparts A (General Provisions), Da (Electric Utility Steam Generating Units) and GG (Stationary Gas Turbines). Compliance with all applicable provisions of these regulations is required.

8. Construction access and circulation routes shall be provided a temporary crushed gravel or pavement surface.
9. All construction related travel routes, exposed or excavated areas, shall be watered down as frequently as necessary to minimize dust.
10. Construction vehicles transporting loose aggregate shall be covered with a tarpaulin or similar dust resistant membrane.
11. Construction vehicle operating speeds shall be controlled to minimize generation of dust.
12. All construction related open storage areas and/or piles of soil, aggregates or any other dust producing material shall be covered or watered down as necessary to prevent generation of dust.
13. Any spillage from construction trucks or other construction equipment on any public street shall be removed promptly.
14. The natural gas fired in each turbine shall be analyzed daily for sulfur content every six months. Sampling and analysis shall be conducted using either ASTM reference methods D1072-80, D3031-81, D3246-81, D4084-82 or other EPA approved methods. Fuel sampling of the natural gas for nitrogen content is waived in its entirety if the facility continues to use pipeline quality natural gas.
15. The applicant must file applications for approval to construct/install and receive approval prior to construction/installation of the following equipment:
 - a. the combustion turbine(s)
 - b. the heat recovery steam generator(s)
 - c. the SCR system(s)

Each application must be submitted at least 120 days prior to the anticipated date of construction/installation. [This condition is no longer applicable to Ocean State Power. However, for historical purposes it will remain in the permit.]

16. During the first year of operation of the facility, the owner/operator shall sample and analyze the cooling tower water influent for total chromium and hexavalent chromium. Samples shall be taken daily and composited and analyzed monthly. The results of this analysis shall be submitted to the Office of Air Resources quarterly. The Office of Air Resources may continue this sampling and analysis requirement beyond the first year's operation at it's discretion, in consideration of the results.
17. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this permit have been achieved. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not

limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.

18. The Office of Air Resources may reopen and revise this permit if it determines that:
 - a. A material mistake was made in establishing the operating restrictions; or,
 - b. inaccurate emission factors were used in establishing the operating restrictions; or,
 - c. emission factors have changed as a result of stack testing or emissions monitoring; or,
 - d. revisions that are necessary due to additional applicable requirements pursuant to state or federal law or from any regulatory agency.

J. Startup/Shutdown Conditions and Initial Commissioning

1. Turbine startup/shutdown shall be defined as that period of time from initiation of combustion turbine firing until the unit reaches steady state load operation. This period shall not exceed 60 minutes for a hot start, 180 minutes for a warm start, nor 240 minutes for a cold start. A warm start shall be defined as startup when the generating unit has been down for more than 2 hours and less than or equal to 48 hours. A cold start shall be defined as startup when the generating unit has been down for more than 48 hours. Unit shutdown shall be defined as that period of time from steady state operation to cessation of combustion turbine firing. This period shall not exceed 60 minutes.
2. Initial turbine commissioning shall be defined as the first 200 hours of combustion turbine operation following initial startup or to commercial acceptance whichever is less.
3. The emission limitations of Conditions A.1-A.4 shall not apply during turbine startup/shutdown conditions or each turbine's initial commissioning.
4. The emission limitations of Conditions A.1.b, A.2.b, A.3.b, and A.4.b shall not apply during equipment cleaning, e.g. on-line washing of the turbine.
5. The owner/operator shall submit to the Office of Air Resources for review and approval, at least 180 days prior to startup, the procedures to be followed during turbine startup/shutdown conditions and initial turbine commissioning. The procedures shall be designed to minimize the emission of air contaminants to the maximum extent practical.

K. Gas Pipeline Low Pressure Incidents

Natural gas shall be deemed unavailable during instances where the gas pipeline pressure drops below 350 psig at the plant boundary. Operation during gas pipeline low pressure incidents shall follow the following procedures:

1. The fuel oil system shall be prepared for operation when the gas pipeline pressure drops to 375 psig.

2. One combustion turbine will be transferred over to fuel oil firing when the gas pipeline pressure drops to 350 psig. The remaining combustion turbines will continue to operate on natural gas.
3. The facility shall continue to operate in this mode if the gas pipeline pressure stabilizes at or near 350 psig.
4. A second combustion turbine will be transferred to fuel oil if the gas pipeline pressure continues to drop. This procedure will continue until either the gas pipeline pressure is stabilized or all four combustion turbines have been transferred to fuel oil,
5. Once the gas pipeline pressure returns to 375 psig or higher, the combustion turbines will be transferred back to natural gas.

EXHIBIT 2



EMISSION ESTIMATE LIST OF ASSUMPTIONS / NOTES

NO. DESCRIPTION OF ASSUMPTION / NOTE

- 1) Emissions estimates are preliminary and do not include any margins. Any relevant margins have to be included by permitting engineer. No guarantees apply.
- 2) The emissions estimates provided are per stack.
- 3) A dry ambient air composition of 0.98% Ar, 78.03% N2, and 20.99% O2 is assumed.
- 4) Standard conditions are defined as 60.0° F, 14.696 psia.
- 5) Combustion turbine performance is based on data provided by GE for Standard combustor (OSP ITO_Unified Format_Values.xlsx) in April 2022 and Caldwell/Gtanalysis for performance and estimates with wet compression (Esitmated Wet Compression Water Requirements_April Revised OEM Data.xlsx)in June 2022.
- 6) Post combustion emissions control equipment include an SCR and CO Catalyst.
- 7) All ppm values are based on CH4 calibration gas.
- 8) Sulfur content of the fuel is assumed to be 1ppm of H2S.
- 9) NOx is controlled to 3.0 ppmvd@15%O2 at the stack. CO is controlled to 10.0 ppmvd at the stack and NH3 slip to 10 ppm as per email from LS power dated 6/17/2021.
- 10) For pollutant emissions where CTG manufacturer data of lb/h was available, the greater of the manufacturer's estimate and B&V's estimate was used in the summary table.
- 11) Fuel gas used for estimates is based on average of monthly samples for Ocean State Power of year 2020.
- 12) The heat input to duct burner for the fired cases is based on B&V Combined Cycle preliminary Heat Balances 2022.
- 13) The emission rate (lb/MMBtu HHV) of duct burner for UHC, VOC, PM(filterable) and PM (total) was assumed to be 0.03 lb/MMBtu HHV, 0.01 lb/MMBtu HHV, 0.005 lb/MMBTu HHV and 0.01 lb/MMBtu HHV respectively as there was no available reference. The emission rate for Nox and CO was considered to be 0.08 lb/MMBtu HHV and 0.05 lb/MMBtu HHV based on communication from ethosenergygroup.
- 14) The SO2 oxidation rate in CTG, CO catalyst, SCR and duct burner are assumed to be 15%, 20%, 3% and 10% respectively. Ammonium sulfates created downstream of the SCR are included in front half particulates and front&back half particulates. The assumption that 100% SO3 is converted to ammonium sulfates results in "worst case" particulate emissions. The SO2 estimates without any consideration of oxidation is also provided in summary for conservative estimate.
- 15) The Steam Turbine output included in estimates is an indicative estimate based on current set of heat balances and provided for information and no guarantees are applicable. The CO2 tons/MWH is estimated based on gross plant output (CTG1+CTG2+STG) for 2x1 CC with performance and emissions being the same for both gas turbine units.
- 16) The stack diameter was assumed to be 21 feet.
- 17) The CO and VOC removal efficiency in the CO catalyst were assumed to be 35.1% and 46.4% to limit stack emissions to permit limits of 10 ppmvd@15%O2 and 1.5 ppmvd@15%O2 respectively. Cormatech has indicated in their response that VOC reduction rate in the catalyst for these estimates can met based on Saturated VOC's being 40% or lower.
- 18) The gas turbine emission rates are assumed to remain the same even with impact of wet compression (no emissions data was provided by Caldwell). Gas Turbine PM emissions are based on data provided for GE.
- 19) Gas Turbine inlet loss assumed to be 4in H2O.

CLIENT NAME: LS POWER | PROJECT NAME: OCEAN STATE POWER
 PROJECT NUMBER: 411089 | REVISION: A | DATE: 28-JUL-2022

Without Capacity Increase

With Capacity Increase

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|---------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Ambient Dry Bulb Temperature, ° F | 0.0 | 59.0 | 90.0 | 0.0 | 59.0 | 90.0 | 59.0 | 90.0 | 0.0 | 59.0 | 90.0 | 90.0 |
| Configuration | CC | CC | CC | CC | CC | CC | CC | CC | CC | CC | CC | CC |
| CTG Manufacturer | GE | GE | GE | GE | GE | GE | GE | GE | GE | GE | GE | GE |
| CTG Model | 7EA | 7EA | 7EA | 7EA | 7EA | 7EA | 7EA | 7EA | 7EA | 7EA | 7EA | 7EA |
| CTG Combustor Type | STD | STD | STD | STD | STD | STD | STD | STD | STD | STD | STD | STD |
| CTG Load, percent of base load | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | Peak | 100.0 | 100.0 | 100.0 | Peak |
| CTG Fuel Type | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas |
| CTG Inlet Air Cooling Type | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger | Evap. Fogger |
| CTG Inlet Air Cooling Status, On/Off | OFF | OFF | ON | OFF | OFF | ON | ON | ON | OFF | ON | ON | ON |
| Wet Compression Status, On/Off | OFF | OFF | OFF | OFF | OFF | OFF | ON | ON | OFF | ON | ON | ON |
| Duct Burner Fuel Type | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas | Natural Gas |
| HRSO Duct Firing | Unfired | Unfired | Unfired | Fired | Fired | Fired | Unfired | Unfired | Fired | Fired | Fired | Fired |
| Post Combustion NOx Emissions Control | SCR | SCR | SCR | SCR | SCR | SCR | SCR | SCR | SCR | SCR | SCR | SCR |
| Post Combustion CO Emissions Control | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst | CO Catalyst |

AMBIENT CONDITIONS

| | | | | | | | | | | | | |
|-----------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Ambient Dry Bulb Temperature, ° F | 0.0 | 59.0 | 90.0 | 0.0 | 59.0 | 90.0 | 59.0 | 90.0 | 0.0 | 59.0 | 90.0 | 90.0 |
| Ambient Relative Humidity, % | 55.0 | 60.0 | 45.0 | 55.0 | 60.0 | 45.0 | 60.0 | 45.0 | 55.0 | 60.0 | 45.0 | 45.0 |
| Atmospheric Pressure, psia | 14.420 | 14.420 | 14.420 | 14.420 | 14.420 | 14.420 | 14.420 | 14.420 | 14.420 | 14.420 | 14.420 | 14.420 |

COMBUSTION TURBINE PERFORMANCE

| CTG Performance Reference | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell | GE Caldwell |
|---|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| CTG Inlet Air Conditioning Effectiveness, percent | 0.0 | 0.0 | 95.0 | 0.0 | 0.0 | 95.0 | 95.0 | 95.0 | 0.0 | 95.0 | 95.0 | 95.0 |
| CTG Compressor Inlet Dry Bulb Temperature, ° F | 0.0 | 59.0 | 73.8 | 0.0 | 59.0 | 73.8 | 51.8 | 73.8 | 0.0 | 51.8 | 73.8 | 73.8 |
| CTG Compressor Inlet Relative Humidity, percent | 54.4 | 59.4 | 75.2 | 54.4 | 59.4 | 75.2 | 77.2 | 75.2 | 54.4 | 77.2 | 75.2 | 75.2 |
| Inlet Loss, in. H2O | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 |
| Exhaust Loss, in. H2O | 18.6 | 15.0 | 13.9 | 18.6 | 15.0 | 13.9 | 16.4 | 15.3 | 18.6 | 16.4 | 15.2 | 15.3 |
| CTG Load Level, percent of base load | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | Peak | 100.0 | 100.0 | 100.0 | Peak |
| Gross CTG Output, kW | 102,509 | 90,451 | 85,289 | 102,509 | 90,451 | 85,289 | 104,451 | 107,000 | 102,509 | 104,451 | 99,289 | 107,000 |
| Gross CTG Heat Rate, Btu/kWh (LHV) | 10,195 | 10,515 | 10,651 | 10,195 | 10,515 | 10,651 | 10,262 | 10,219 | 10,195 | 10,262 | 10,396 | 10,219 |
| Gross CTG Heat Rate, Btu/kWh (HHV) | 11,321 | 11,675 | 11,827 | 11,321 | 11,675 | 11,827 | 11,395 | 11,347 | 11,321 | 11,395 | 11,543 | 11,347 |
| CTG Heat Input, MBtu/h (LHV) | 1,045.1 | 951.1 | 908.4 | 1,045.1 | 951.1 | 908.4 | 1,071.9 | 1,093.4 | 1,045.1 | 1,071.9 | 1,032.2 | 1,093.4 |
| CTG Heat Input, MBtu/h (HHV) | 1,160.5 | 1,056.1 | 1,008.7 | 1,160.5 | 1,056.1 | 1,008.7 | 1,190.2 | 1,214.1 | 1,160.5 | 1,190.2 | 1,146.1 | 1,214.1 |
| CTG Water/Steam Injection Flow, lb/h | 37,899 | 37,355 | 45,126 | 37,899 | 37,355 | 45,126 | 104,181 | 106,056 | 37,899 | 104,181 | 102,628 | 106,056 |
| Injection Fluid/Fuel Ratio | 0.77 | 0.84 | 1.06 | 0.77 | 0.84 | 1.06 | 2.07 | 2.07 | 0.77 | 2.07 | 2.12 | 2.07 |
| CTG Exhaust Flow, lb/h | 2,621,220 | 2,305,205 | 2,211,769 | 2,621,220 | 2,305,205 | 2,211,769 | 2,415,051 | 2,330,595 | 2,621,220 | 2,415,051 | 2,320,197 | 2,330,595 |
| CTG Exhaust Temperature, ° F | 931 | 1,014 | 1,026 | 931 | 1,014 | 1,026 | 1,029 | 1,100 | 931 | 1,029 | 1,041 | 1,100 |

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|-------------|---|---|---|----|----|----|----|----|----|----|----|----|
|-------------|---|---|---|----|----|----|----|----|----|----|----|----|

COMBUSTION TURBINE FUEL

| | | | | | | | | | | | | |
|--|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Total CTG Fuel Flow, lb/h | 49,030 | 44,610 | 42,610 | 49,030 | 44,610 | 42,610 | 50,280 | 51,290 | 49,030 | 50,280 | 48,420 | 51,290 |
| CTG Fuel Temperature, ° F | 80.0 | 80.0 | 80.0 | 80.0 | 80.0 | 80.0 | 80.0 | 80.0 | 80.0 | 80.0 | 80.0 | 80.0 |
| CTG Fuel LHV, Btu/lb | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 |
| CTG Fuel HHV, Btu/lb | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 |
| HHV/LHV Ratio | 1.1104 | 1.1104 | 1.1104 | 1.1104 | 1.1104 | 1.1104 | 1.1104 | 1.1104 | 1.1104 | 1.1104 | 1.1104 | 1.1104 |
| CTG Fuel Composition (Ultimate Analysis by Weight) | | | | | | | | | | | | |
| Ar, % wt. | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| C, % wt. | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 |
| H2, % wt. | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 |
| N2, % wt. | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 |
| O2, % wt. | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 |
| S, % wt. | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 |
| Total, % wt. | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 |
| Fuel Sulfur Content (grains/100 standard cubic feet) | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 |
| Fuel Sulfur Content, ppm | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 |

COMBUSTION TURBINE EXHAUST

CTG EXHAUST ANALYSIS (VOLUME BASIS - WET)

| | | | | | | | | | | | | |
|------------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Ar, % vol. | 0.93 | 0.91 | 0.90 | 0.93 | 0.91 | 0.90 | 0.87 | 0.86 | 0.93 | 0.87 | 0.86 | 0.86 |
| CO2, % vol. | 3.29 | 3.39 | 3.35 | 3.29 | 3.39 | 3.35 | 3.58 | 3.76 | 3.29 | 3.58 | 3.57 | 3.76 |
| H2O, % vol. | 8.85 | 10.19 | 11.82 | 8.85 | 10.19 | 11.82 | 14.63 | 16.34 | 8.85 | 14.63 | 15.79 | 16.34 |
| N2, % vol. | 73.66 | 72.69 | 71.39 | 73.66 | 72.69 | 71.39 | 69.37 | 68.19 | 73.66 | 69.37 | 68.47 | 68.19 |
| O2, % vol. | 13.27 | 12.82 | 12.54 | 13.27 | 12.82 | 12.54 | 11.54 | 10.86 | 13.27 | 11.54 | 11.31 | 10.86 |
| SO2, (after SO2 oxidation), % vol. | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| SO3, (after SO2 oxidation), % vol. | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Total, % vol. | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 |
| Molecular Wt, lb/mol | 28.30 | 28.16 | 27.98 | 28.30 | 28.16 | 27.98 | 27.69 | 27.52 | 28.30 | 27.69 | 27.56 | 27.52 |
| Specific Volume, ft^3/lb | 34.94 | 37.54 | 38.20 | 34.94 | 37.54 | 38.20 | 38.43 | 40.61 | 34.94 | 38.43 | 39.04 | 40.61 |
| Specific Volume, scf/lb | 13.41 | 13.47 | 13.56 | 13.41 | 13.47 | 13.56 | 13.70 | 13.79 | 13.41 | 13.70 | 13.77 | 13.79 |
| Exhaust Gas Flow, acfm | 1,526,424 | 1,442,290 | 1,408,159 | 1,526,424 | 1,442,290 | 1,408,159 | 1,546,840 | 1,577,424 | 1,526,424 | 1,546,840 | 1,509,675 | 1,577,424 |
| Exhaust Gas Flow, scfm | 585,843 | 517,518 | 499,860 | 585,843 | 517,518 | 499,860 | 551,437 | 535,648 | 585,843 | 551,437 | 532,485 | 535,648 |

CTG NOX EMISSIONS (WITHOUT POST COMBUSTION EMISSIONS CONTROL)

| | | | | | | | | | | | | |
|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| NOx Massflow Added to Match CTG Manufacturer's NOx Emissions Estimate, lb/h | 0.0 | 0.0 | 0.0 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 |
| NOx, ppmvd (dry, 15% O2) | 42.0 | 42.0 | 42.0 | 42.0 | 42.0 | 42.0 | 42.0 | 42.0 | 42.0 | 42.0 | 42.0 | 42.0 |
| NOx, ppmvd (dry) | 45.1 | 47.1 | 47.4 | 45.1 | 47.1 | 47.4 | 52.4 | 56.2 | 45.1 | 52.4 | 53.0 | 56.2 |
| NOx, ppmvw (wet) | 41.1 | 42.3 | 41.8 | 41.1 | 42.3 | 41.8 | 44.7 | 47.0 | 41.1 | 44.7 | 44.6 | 47.0 |
| NOx, lb/h as NO2 | 175.0 | 159.3 | 152.1 | 175.3 | 159.6 | 152.4 | 179.8 | 183.4 | 175.3 | 179.8 | 173.2 | 183.4 |
| NOx, lb/MBtu (LHV) as NO2 | 0.1675 | 0.1675 | 0.1675 | 0.1678 | 0.1678 | 0.1678 | 0.1677 | 0.1678 | 0.1678 | 0.1677 | 0.1678 | 0.1678 |
| NOx, lb/MBtu (HHV) as NO2 | 0.1508 | 0.1508 | 0.1508 | 0.1511 | 0.1511 | 0.1511 | 0.1511 | 0.1511 | 0.1511 | 0.1511 | 0.1511 | 0.1511 |

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| CTG CO EMISSIONS (WITHOUT POST COMBUSTION EMISSIONS CONTROL) | | | | | | | | | | | | |
| CO Massflow Added to Match CTG Manufacturer's CO Emissions Estimate, lb/h | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| CO, ppmvd (dry, 15% O2) | 9.3 | 8.9 | 8.9 | 9.3 | 8.9 | 8.9 | 8.0 | 7.5 | 9.3 | 8.0 | 7.9 | 7.5 |
| CO, ppmvd (dry) | 10.0 | 10.0 | 10.0 | 10.0 | 10.0 | 10.0 | 10.0 | 10.0 | 10.0 | 10.0 | 10.0 | 10.0 |
| CO, ppmvw (wet) | 9.1 | 9.0 | 8.8 | 9.1 | 9.0 | 8.8 | 8.5 | 8.4 | 9.1 | 8.5 | 8.4 | 8.4 |
| CO, lb/h | 23.7 | 20.6 | 19.5 | 23.7 | 20.6 | 19.5 | 20.9 | 19.8 | 23.7 | 20.9 | 19.9 | 19.8 |
| CO, lb/MBtu (LHV) | 0.0226 | 0.0217 | 0.0215 | 0.0226 | 0.0217 | 0.0215 | 0.0195 | 0.0182 | 0.0226 | 0.0195 | 0.0192 | 0.0182 |
| CO, lb/MBtu (HHV) | 0.0204 | 0.0195 | 0.0194 | 0.0204 | 0.0195 | 0.0194 | 0.0175 | 0.0163 | 0.0204 | 0.0175 | 0.0173 | 0.0163 |
| CTG SO2 EMISSIONS (WITHOUT THE EFFECTS OF SO2 OXIDATION) | | | | | | | | | | | | |
| SO2, ppmvd (dry, 15% O2) | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 |
| SO2, ppmvd (dry) | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 |
| SO2, ppmvw (wet) | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.04 | 0.04 | 0.03 | 0.04 | 0.03 | 0.04 |
| SO2, lb/h | 0.19 | 0.17 | 0.17 | 0.19 | 0.17 | 0.17 | 0.20 | 0.20 | 0.19 | 0.20 | 0.19 | 0.20 |
| SO2, lb/MBtu (LHV) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 |
| SO2, lb/MBtu (HHV) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 |
| CTG SO2 EMISSIONS (WITH THE EFFECTS OF SO2 OXIDATION, WITHOUT POST COMBUSTION EMISSIONS CONTROL) | | | | | | | | | | | | |
| Assumed SO2 oxidation rate in CTG, vol% | 15.0 | 15.0 | 15.0 | 15.0 | 15.0 | 15.0 | 15.0 | 15.0 | 15.0 | 15.0 | 15.0 | 15.0 |
| SO2, ppmvd (dry, 15% O2) | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 |
| SO2, ppmvd (dry) | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.04 | 0.03 | 0.03 | 0.04 | 0.04 |
| SO2, ppmvw (wet) | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 |
| SO2, lb/h | 0.16 | 0.15 | 0.14 | 0.16 | 0.15 | 0.14 | 0.17 | 0.17 | 0.16 | 0.17 | 0.16 | 0.17 |
| SO2, lb/MBtu (LHV) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 |
| SO2, lb/MBtu (HHV) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 |
| CTG UHC EMISSIONS (WITHOUT POST COMBUSTION EMISSIONS CONTROL) | | | | | | | | | | | | |
| UHC Massflow Added to Match CTG Manufacturer's UHC Emissions Estimate, lb/h | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| UHC, ppmvd (dry, 15% O2) | 7.2 | 7.0 | 7.0 | 7.2 | 7.0 | 7.0 | 6.6 | 6.3 | 7.2 | 6.6 | 6.6 | 6.3 |
| UHC, ppmvd (dry) | 7.7 | 7.8 | 7.9 | 7.7 | 7.8 | 7.9 | 8.2 | 8.4 | 7.7 | 8.2 | 8.3 | 8.4 |
| UHC, ppmvw (wet) | 7.0 | 7.0 | 7.0 | 7.0 | 7.0 | 7.0 | 7.0 | 7.0 | 7.0 | 7.0 | 7.0 | 7.0 |
| UHC, lb/h as CH4 | 10.4 | 9.2 | 8.9 | 10.4 | 9.2 | 8.9 | 9.8 | 9.5 | 10.4 | 9.8 | 9.5 | 9.5 |
| UHC, lb/MBtu as CH4 (LHV) | 0.0100 | 0.0097 | 0.0098 | 0.0100 | 0.0097 | 0.0098 | 0.0092 | 0.0087 | 0.0100 | 0.0092 | 0.0092 | 0.0087 |
| UHC, lb/MBtu as CH4 (HHV) | 0.0090 | 0.0087 | 0.0088 | 0.0090 | 0.0087 | 0.0088 | 0.0082 | 0.0078 | 0.0090 | 0.0082 | 0.0083 | 0.0078 |
| CTG VOC EMISSIONS (WITHOUT POST COMBUSTION EMISSIONS CONTROL) | | | | | | | | | | | | |
| VOC Massflow Added to Match CTG Manufacturer's VOC Emissions Estimate, lb/h | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| VOC percentage of UHC | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 |
| VOC, ppmvd (dry, 15% O2) | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.3 | 1.3 | 1.4 | 1.3 | 1.3 | 1.3 |
| VOC, ppmvd (dry) | 1.5 | 1.6 | 1.6 | 1.5 | 1.6 | 1.6 | 1.6 | 1.7 | 1.5 | 1.6 | 1.7 | 1.7 |
| VOC, ppmvw (wet) | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 |
| VOC, lb/h as CH4 | 2.1 | 1.8 | 1.8 | 2.1 | 1.8 | 1.8 | 2.0 | 1.9 | 2.1 | 2.0 | 1.9 | 1.9 |
| VOC, lb/MBtu as CH4 (LHV) | 0.0020 | 0.0019 | 0.0020 | 0.0020 | 0.0019 | 0.0020 | 0.0018 | 0.0017 | 0.0020 | 0.0018 | 0.0018 | 0.0017 |
| VOC, lb/MBtu as CH4 (HHV) | 0.0018 | 0.0017 | 0.0018 | 0.0018 | 0.0017 | 0.0018 | 0.0016 | 0.0016 | 0.0018 | 0.0016 | 0.0017 | 0.0016 |

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|--|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| CTG CO2 EMISSIONS | | | | | | | | | | | | |
| CO2, lb/h | 134,100 | 122,011 | 116,541 | 134,100 | 122,011 | 116,541 | 137,519 | 140,281 | 134,100 | 137,519 | 132,432 | 140,281 |
| CO2, lb/MBtu (LHV) | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 |
| CO2, lb/MBtu (HHV) | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 |
| CTG PM10 EMISSIONS (WITHOUT THE EFFECTS OF SO2 OXIDATION) | | | | | | | | | | | | |
| PM10 EMISSIONS - FRONT HALF CATCH ONLY | | | | | | | | | | | | |
| PM10, lb/h | 2.7 | 2.7 | 2.7 | 2.7 | 2.7 | 2.7 | 2.7 | 2.7 | 2.7 | 2.7 | 2.7 | 2.7 |
| PM10, lb/MBtu (LHV) | 0.0026 | 0.0028 | 0.0030 | 0.0026 | 0.0028 | 0.0030 | 0.0025 | 0.0025 | 0.0026 | 0.0025 | 0.0026 | 0.0025 |
| PM10, lb/MBtu (HHV) | 0.0023 | 0.0026 | 0.0027 | 0.0023 | 0.0026 | 0.0027 | 0.0023 | 0.0022 | 0.0023 | 0.0023 | 0.0024 | 0.0022 |
| PM10 EMISSIONS - FRONT AND BACK HALF CATCH | | | | | | | | | | | | |
| PM10, lb/h | 5.3 | 5.3 | 5.3 | 5.3 | 5.3 | 5.3 | 5.3 | 5.3 | 5.3 | 5.3 | 5.3 | 5.3 |
| PM10, lb/MBtu (LHV) | 0.0051 | 0.0056 | 0.0058 | 0.0051 | 0.0056 | 0.0058 | 0.0049 | 0.0048 | 0.0051 | 0.0049 | 0.0051 | 0.0048 |
| PM10, lb/MBtu (HHV) | 0.0046 | 0.0050 | 0.0053 | 0.0046 | 0.0050 | 0.0053 | 0.0045 | 0.0044 | 0.0046 | 0.0045 | 0.0046 | 0.0044 |
| HRSG DUCT BURNERS | | | | | | | | | | | | |
| DUCT BURNER FUEL | | | | | | | | | | | | |
| Duct Burner Heat Input, MBtu/h (LHV) | 0.0 | 0.0 | 0.0 | 276.7 | 232.4 | 235.4 | 0.0 | 0.0 | 276.7 | 232.4 | 235.4 | 196.8 |
| Duct Burner Heat Input, MBtu/h (HHV) | 0.0 | 0.0 | 0.0 | 307.2 | 258.0 | 261.4 | 0.0 | 0.0 | 307.2 | 258.0 | 261.4 | 218.6 |
| Total Duct Burner Fuel Flow, lb/h | 0 | 0 | 0 | 12,978 | 10,900 | 11,042 | 0 | 0 | 12,978 | 10,900 | 11,042 | 9,233 |
| Duct Burner Fuel LHV, Btu/lb | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 | 21,318 |
| Duct Burner Fuel HHV, Btu/lb | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 | 23,671 |
| Duct Burner Fuel Composition (Ultimate Analysis by Weight) | | | | | | | | | | | | |
| Ar, % wt. | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| C, % wt. | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 | 74.64 |
| H2, % wt. | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 | 24.76 |
| N2, % wt. | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 | 0.47 |
| O2, % wt. | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 | 0.13 |
| S, % wt. | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 | 0.00020 |
| Total, % wt. | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 |
| Fuel Sulfur Content (grains/100 standard cubic feet) | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 | 0.06 |
| DUCT BURNER EMISSIONS | | | | | | | | | | | | |
| Duct Burner NOx, lb/MBtu (HHV) | 0.0800 | 0.0800 | 0.0800 | 0.0800 | 0.0800 | 0.0800 | 0.0800 | 0.0800 | 0.0800 | 0.0800 | 0.0800 | 0.0800 |
| Duct Burner CO, lb/MBtu (HHV) | 0.0500 | 0.0500 | 0.0500 | 0.0500 | 0.0500 | 0.0500 | 0.0500 | 0.0500 | 0.0500 | 0.0500 | 0.0500 | 0.0500 |
| Duct Burner UHC (as CH4), lb/MBtu (HHV) | 0.0300 | 0.0300 | 0.0300 | 0.0300 | 0.0300 | 0.0300 | 0.0300 | 0.0300 | 0.0300 | 0.0300 | 0.0300 | 0.0300 |
| Duct Burner VOC (as CH4), lb/MBtu (HHV) | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 |
| Duct Burner PM10, lb/MBtu (HHV) (front half catch only) | 0.0050 | 0.0050 | 0.0050 | 0.0050 | 0.0050 | 0.0050 | 0.0050 | 0.0050 | 0.0050 | 0.0050 | 0.0050 | 0.0050 |
| Duct Burner PM10, lb/MBtu (HHV) (front and back half catch) | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 | 0.0100 |
| Assumed SO2 oxidation rate in Duct Burner, vol% | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 10.0 | 10.0 | 10.0 | 10.0 |
| Total SO2, lb/h from Duct Burner Fuel only (after SO2 oxidation) | 0.0000 | 0.0000 | 0.0000 | 0.0506 | 0.0425 | 0.0430 | 0.0000 | 0.0000 | 0.0455 | 0.0382 | 0.0387 | 0.0324 |
| Total SO3, lb/h from Duct Burner Fuel only (after SO2 oxidation) | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0063 | 0.0053 | 0.0054 | 0.0045 |
| Duct Burner NOx, lb/h | 0.00 | 0.00 | 0.00 | 24.58 | 20.64 | 20.91 | 0.00 | 0.00 | 24.58 | 20.64 | 20.91 | 17.48 |
| Duct Burner CO, lb/h | 0.00 | 0.00 | 0.00 | 15.36 | 12.90 | 13.07 | 0.00 | 0.00 | 15.36 | 12.90 | 13.07 | 10.93 |
| Duct Burner UHC (as CH4), lb/h | 0.00 | 0.00 | 0.00 | 9.22 | 7.74 | 7.84 | 0.00 | 0.00 | 9.22 | 7.74 | 7.84 | 6.56 |
| Duct Burner VOC (as CH4), lb/h | 0.00 | 0.00 | 0.00 | 3.07 | 2.58 | 2.61 | 0.00 | 0.00 | 3.07 | 2.58 | 2.61 | 2.19 |
| Duct Burner PM10, lb/h (front half catch only) | 0.0 | 0.0 | 0.0 | 1.5 | 1.3 | 1.3 | 0.0 | 0.0 | 1.5 | 1.3 | 1.3 | 1.1 |
| Duct Burner PM10, lb/h (front and back half catch) | 0.0 | 0.0 | 0.0 | 3.1 | 2.6 | 2.6 | 0.0 | 0.0 | 3.1 | 2.6 | 2.6 | 2.2 |

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|-------------|---|---|---|----|----|----|----|----|----|----|----|----|
|-------------|---|---|---|----|----|----|----|----|----|----|----|----|

STACK EMISSIONS

STACK EXHAUST ANALYSIS (VOLUME BASIS - WET)

| | | | | | | | | | | | | |
|------------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Ar, % vol. | 0.93 | 0.91 | 0.90 | 0.92 | 0.91 | 0.89 | 0.87 | 0.86 | 0.92 | 0.86 | 0.85 | 0.85 |
| CO2, % vol. | 3.29 | 3.39 | 3.35 | 4.12 | 4.18 | 4.18 | 3.58 | 3.76 | 4.12 | 4.33 | 4.35 | 4.41 |
| H2O, % vol. | 8.85 | 10.19 | 11.82 | 10.48 | 11.73 | 13.42 | 14.63 | 16.34 | 10.48 | 16.05 | 17.26 | 17.56 |
| N2, % vol. | 73.66 | 72.69 | 71.39 | 73.03 | 72.10 | 70.78 | 69.37 | 68.19 | 73.03 | 68.85 | 67.92 | 67.73 |
| O2, % vol. | 13.27 | 12.82 | 12.54 | 11.45 | 11.08 | 10.73 | 11.54 | 10.86 | 11.45 | 9.92 | 9.61 | 9.45 |
| SO2, (after SO2 oxidation), % vol. | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| SO3, (after SO2 oxidation), % vol. | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 | 0.00000 |
| Total, % vol. | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 |
| Stack Exit Temperature, ° F | 222.7 | 213.7 | 219.2 | 211.7 | 206.9 | 210.2 | 216.7 | 219.9 | 208.6 | 208.7 | 211.9 | 212.9 |
| Stack Diameter, ft (estimated) | 16.0 | 16.0 | 16.0 | 16.0 | 16.0 | 16.0 | 16.0 | 16.0 | 16.0 | 16.0 | 16.0 | 16.0 |
| Stack Flow, lb/h | 2,621,220 | 2,305,205 | 2,211,769 | 2,634,198 | 2,316,104 | 2,222,811 | 2,415,051 | 2,330,595 | 2,634,198 | 2,425,950 | 2,331,239 | 2,339,827 |
| Stack Flow, scfm | 585,843 | 517,518 | 499,860 | 590,938 | 521,895 | 504,208 | 551,437 | 535,648 | 590,938 | 555,947 | 536,574 | 538,940 |
| Stack Flow, acfm | 783,745 | 683,493 | 665,374 | 777,966 | 682,479 | 662,398 | 731,760 | 713,550 | 774,454 | 728,594 | 706,754 | 710,918 |
| Stack Exit Velocity, ft/s | 65 | 57 | 55 | 64 | 57 | 55 | 61 | 59 | 64 | 60 | 59 | 59 |

STACK NOX EMISSIONS WITHOUT THE EFFECTS OF SELECTIVE CATALYTIC REDUCTION (SCR) †

| | | | | | | | | | | | | |
|---------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| NOx, ppmvd (dry, 15% O2) | 42.0 | 42.0 | 42.0 | 37.9 | 38.1 | 37.9 | 42.0 | 42.0 | 37.9 | 38.5 | 38.3 | 39.0 |
| NOx, ppmvd (dry) | 45.1 | 47.1 | 47.4 | 51.9 | 53.7 | 54.5 | 52.4 | 56.2 | 51.9 | 59.0 | 60.0 | 62.0 |
| NOx, ppmvw (wet) | 41.1 | 42.3 | 41.8 | 46.4 | 47.4 | 47.2 | 44.7 | 47.0 | 46.4 | 49.5 | 49.6 | 51.1 |
| NOx, lb/h as NO2 | 175.0 | 159.3 | 152.1 | 199.9 | 180.2 | 173.3 | 179.8 | 183.4 | 199.9 | 200.5 | 194.1 | 200.9 |
| NOx, lb/MBtu (LHV) as NO2 | 0.1675 | 0.1675 | 0.1675 | 0.1513 | 0.1523 | 0.1515 | 0.1677 | 0.1678 | 0.1513 | 0.1537 | 0.1531 | 0.1557 |
| NOx, lb/MBtu (HHV) as NO2 | 0.1508 | 0.1508 | 0.1508 | 0.1362 | 0.1371 | 0.1365 | 0.1511 | 0.1511 | 0.1362 | 0.1384 | 0.1379 | 0.1402 |

† Note: includes NOx massflow added to match CTG manufacturer estimate and duct burner NOx.

STACK NOX EMISSIONS WITH THE EFFECTS OF SELECTIVE CATALYTIC REDUCTION (SCR) †

| | | | | | | | | | | | | |
|---------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| NOx, ppmvd (dry, 15% O2) | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 |
| NOx, ppmvd (dry) | 3.2 | 3.4 | 3.4 | 4.1 | 4.2 | 4.3 | 3.7 | 4.0 | 4.1 | 4.6 | 4.7 | 4.8 |
| NOx, ppmvw (wet) | 2.9 | 3.0 | 3.0 | 3.7 | 3.7 | 3.7 | 3.2 | 3.4 | 3.7 | 3.9 | 3.9 | 3.9 |
| NOx, lb/h as NO2 | 12.5 | 11.4 | 10.9 | 15.8 | 14.2 | 13.7 | 12.8 | 13.1 | 15.8 | 15.6 | 15.2 | 15.5 |
| NOx, lb/MBtu (LHV) as NO2 | 0.0120 | 0.0120 | 0.0120 | 0.0120 | 0.0120 | 0.0120 | 0.0120 | 0.0120 | 0.0120 | 0.0120 | 0.0120 | 0.0120 |
| NOx, lb/MBtu (HHV) as NO2 | 0.0108 | 0.0108 | 0.0108 | 0.0108 | 0.0108 | 0.0108 | 0.0108 | 0.0108 | 0.0108 | 0.0108 | 0.0108 | 0.0108 |

| | | | | | | | | | | | | |
|-----------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| SCR NH3 slip, ppmvd (dry, 15% O2) | 10.00 | 10.00 | 10.00 | 10.00 | 10.00 | 10.00 | 10.00 | 10.00 | 10.00 | 10.00 | 10.00 | 10.00 |
|-----------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|

| | | | | | | | | | | | | |
|--------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| SCR NH3 slip, lb/h | 15.43 | 14.04 | 13.41 | 19.51 | 17.47 | 16.88 | 15.82 | 16.14 | 19.51 | 19.25 | 18.71 | 19.04 |
|--------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|

† Note: includes NOx massflow added to match CTG manufacturer estimate and duct burner NOx.

STACK CO EMISSIONS WITHOUT THE EFFECTS OF CATALYTIC REDUCTION (CO CATALYST) †

| | | | | | | | | | | | | |
|-------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| CO, ppmvd (dry, 15% O2) | 9.3 | 8.9 | 8.9 | 12.2 | 11.7 | 11.7 | 8.0 | 7.5 | 12.2 | 10.7 | 10.7 | 9.8 |
| CO, ppmvd (dry) | 10.0 | 10.0 | 10.0 | 16.7 | 16.4 | 16.9 | 10.0 | 10.0 | 16.7 | 16.3 | 16.7 | 15.6 |
| CO, ppmvw (wet) | 9.1 | 9.0 | 8.8 | 14.9 | 14.5 | 14.6 | 8.5 | 8.4 | 14.9 | 13.7 | 13.9 | 12.9 |
| CO, lb/h | 23.7 | 20.6 | 19.5 | 39.0 | 33.5 | 32.6 | 20.9 | 19.8 | 39.0 | 33.8 | 32.9 | 30.8 |
| CO, lb/MBtu (LHV) | 0.0226 | 0.0217 | 0.0215 | 0.0295 | 0.0283 | 0.0285 | 0.0195 | 0.0182 | 0.0295 | 0.0259 | 0.0260 | 0.0239 |
| CO, lb/MBtu (HHV) | 0.0204 | 0.0195 | 0.0194 | 0.0266 | 0.0255 | 0.0257 | 0.0175 | 0.0163 | 0.0266 | 0.0233 | 0.0234 | 0.0215 |

† Note: includes CO massflow added to match CTG manufacturer estimate and duct burner CO.

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| STACK CO EMISSIONS WITH THE EFFECTS OF CATALYTIC REDUCTION (CO CATALYST) † | | | | | | | | | | | | |
| CO, ppmvd (dry, 15% O2) | 6.1 | 5.8 | 5.8 | 7.9 | 7.6 | 7.6 | 5.2 | 4.9 | 7.9 | 6.9 | 6.9 | 6.4 |
| CO, ppmvd (dry) | 6.5 | 6.5 | 6.5 | 10.8 | 10.7 | 10.9 | 6.5 | 6.5 | 10.8 | 10.6 | 10.9 | 10.1 |
| CO, ppmvw (wet) | 5.9 | 5.8 | 5.7 | 9.7 | 9.4 | 9.5 | 5.5 | 5.4 | 9.7 | 8.9 | 9.0 | 8.4 |
| CO, lb/h | 15.4 | 13.4 | 12.7 | 25.3 | 21.7 | 21.2 | 13.5 | 12.9 | 25.3 | 21.9 | 21.4 | 20.0 |
| CO, lb/MBtu (LHV) | 0.0147 | 0.0141 | 0.0140 | 0.0192 | 0.0184 | 0.0185 | 0.0126 | 0.0118 | 0.0192 | 0.0168 | 0.0169 | 0.0155 |
| CO, lb/MBtu (HHV) | 0.0132 | 0.0127 | 0.0126 | 0.0173 | 0.0166 | 0.0167 | 0.0114 | 0.0106 | 0.0173 | 0.0151 | 0.0152 | 0.0139 |
| † Note: includes CO massflow added to match CTG manufacturer estimate and duct burner CO. | | | | | | | | | | | | |
| STACK SO2 EMISSIONS WITHOUT THE EFFECTS OF SO2 OXIDATION † | | | | | | | | | | | | |
| SO2, ppmvd (dry, 15% O2) | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 |
| SO2, ppmvd (dry) | 0.04 | 0.04 | 0.04 | 0.05 | 0.05 | 0.05 | 0.04 | 0.04 | 0.05 | 0.05 | 0.05 | 0.05 |
| SO2, ppmvw (wet) | 0.03 | 0.03 | 0.03 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 | 0.04 |
| SO2, lb/h | 0.19 | 0.17 | 0.17 | 0.24 | 0.22 | 0.21 | 0.20 | 0.20 | 0.24 | 0.24 | 0.23 | 0.24 |
| SO2, lb/MBtu (LHV) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 |
| SO2, lb/MBtu (HHV) | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | 0.0002 |
| † Note: SO2 from CTG and and duct burner SO2. | | | | | | | | | | | | |
| STACK SO2 EMISSIONS WITH THE EFFECTS OF SO2 OXIDATION † | | | | | | | | | | | | |
| Assumed SO2 oxidation rate in CO Catalyst, vol% | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 | 20.0 |
| Assumed SO2 oxidation rate in SCR, vol% | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 | 3.0 |
| SO2, ppmvd (dry, 15% O2) | 0.02 | 0.02 | 0.02 | 0.02 | 0.02 | 0.02 | 0.02 | 0.02 | 0.02 | 0.02 | 0.02 | 0.02 |
| SO2, ppmvd (dry) | 0.02 | 0.02 | 0.02 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 | 0.03 |
| SO2, ppmvw (wet) | 0.02 | 0.02 | 0.02 | 0.03 | 0.03 | 0.03 | 0.02 | 0.02 | 0.02 | 0.03 | 0.03 | 0.03 |
| SO2, lb/h | 0.13 | 0.11 | 0.11 | 0.17 | 0.15 | 0.14 | 0.13 | 0.13 | 0.15 | 0.15 | 0.14 | 0.14 |
| SO2, lb/MBtu (LHV) (incl. duct burner fuel) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 |
| SO2, lb/MBtu (HHV) (incl. duct burner fuel) | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0001 |
| † Note: Also includes assumed SO2 oxidation rate in CTG. | | | | | | | | | | | | |
| STACK UHC EMISSIONS † | | | | | | | | | | | | |
| UHC, ppmvd (dry, 15% O2) | 7.2 | 7.0 | 7.0 | 10.7 | 10.3 | 10.5 | 6.6 | 6.3 | 10.7 | 9.7 | 9.8 | 9.0 |
| UHC, ppmvd (dry) | 7.7 | 7.8 | 7.9 | 14.6 | 14.5 | 15.1 | 8.2 | 8.4 | 14.6 | 14.8 | 15.4 | 14.2 |
| UHC, ppmvw (wet) | 7.0 | 7.0 | 7.0 | 13.1 | 12.8 | 13.1 | 7.0 | 7.0 | 13.1 | 12.4 | 12.7 | 11.7 |
| UHC, lb/h as CH4 | 10.4 | 9.2 | 8.9 | 19.6 | 17.0 | 16.7 | 9.8 | 9.5 | 19.6 | 17.6 | 17.3 | 16.1 |
| UHC, lb/MBtu (LHV) as CH4 | 0.0100 | 0.0097 | 0.0098 | 0.0149 | 0.0143 | 0.0146 | 0.0092 | 0.0087 | 0.0149 | 0.0135 | 0.0137 | 0.0125 |
| UHC, lb/MBtu (HHV) as CH4 | 0.0090 | 0.0087 | 0.0088 | 0.0134 | 0.0129 | 0.0132 | 0.0082 | 0.0078 | 0.0134 | 0.0121 | 0.0123 | 0.0112 |
| † Note: includes UHC massflow added to match CTG manufacturer estimate and duct burner UHC. | | | | | | | | | | | | |
| STACK VOC EMISSIONS WITHOUT THE EFFECT OF OXIDATION IN CO CATALYST † | | | | | | | | | | | | |
| VOC, ppmvd (dry, 15% O2) | 1.4 | 1.4 | 1.4 | 2.8 | 2.7 | 2.8 | 1.3 | 1.3 | 2.8 | 2.5 | 2.6 | 2.3 |
| VOC, ppmvd (dry) | 1.5 | 1.6 | 1.6 | 3.8 | 3.8 | 4.0 | 1.6 | 1.7 | 3.8 | 3.8 | 4.0 | 3.6 |
| VOC, ppmvw (wet) | 1.4 | 1.4 | 1.4 | 3.4 | 3.3 | 3.4 | 1.4 | 1.4 | 3.4 | 3.2 | 3.3 | 3.0 |
| VOC, lb/h as CH4 | 2.1 | 1.8 | 1.8 | 5.2 | 4.4 | 4.4 | 2.0 | 1.9 | 5.2 | 4.5 | 4.5 | 4.1 |
| VOC, lb/MBtu (LHV) as CH4 | 0.0020 | 0.0019 | 0.0020 | 0.0039 | 0.0037 | 0.0038 | 0.0018 | 0.0017 | 0.0039 | 0.0035 | 0.0036 | 0.0032 |
| VOC, lb/MBtu (HHV) as CH4 | 0.0018 | 0.0017 | 0.0018 | 0.0035 | 0.0034 | 0.0035 | 0.0016 | 0.0016 | 0.0035 | 0.0031 | 0.0032 | 0.0029 |
| † Note: includes VOC massflow added to match CTG manufacturer estimate and duct burner VOC. | | | | | | | | | | | | |

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|--|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| STACK VOC EMISSIONS WITH THE EFFECTS OF CATALYTIC REDUCTION (CO CATALYST) † | | | | | | | | | | | | |
| VOC, ppmvd (dry, 15% O2) | 0.8 | 0.7 | 0.8 | 1.5 | 1.4 | 1.5 | 0.7 | 0.7 | 1.5 | 1.3 | 1.4 | 1.2 |
| VOC, ppmvd (dry) | 0.8 | 0.8 | 0.9 | 2.1 | 2.0 | 2.1 | 0.9 | 0.9 | 2.1 | 2.1 | 2.1 | 1.9 |
| VOC, ppmvw (wet) | 0.8 | 0.8 | 0.8 | 1.8 | 1.8 | 1.8 | 0.8 | 0.8 | 1.8 | 1.7 | 1.8 | 1.6 |
| VOC, lb/h as CH4 | 1.1 | 1.0 | 1.0 | 2.8 | 2.4 | 2.4 | 1.1 | 1.0 | 2.8 | 2.4 | 2.4 | 2.2 |
| VOC, lb/MBtu (LHV) as CH4 | 0.0011 | 0.0010 | 0.0010 | 0.0021 | 0.0020 | 0.0021 | 0.0010 | 0.0009 | 0.0021 | 0.0019 | 0.0019 | 0.0017 |
| VOC, lb/MBtu (HHV) as CH4 | 0.0010 | 0.0009 | 0.0009 | 0.0019 | 0.0018 | 0.0019 | 0.0009 | 0.0008 | 0.0019 | 0.0017 | 0.0017 | 0.0015 |
| † Note: includes VOC massflow added to match CTG manufacturer estimate and duct burner VOC. | | | | | | | | | | | | |
| STACK CO2 EMISSIONS † | | | | | | | | | | | | |
| CO2, lb/h | 134,100 | 122,011 | 116,541 | 169,596 | 151,822 | 146,743 | 137,519 | 140,281 | 169,596 | 167,330 | 162,633 | 165,533 |
| CO2, lb/MBtu (LHV) | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 | 128 |
| CO2, lb/MBtu (HHV) | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 | 116 |
| CO2, tons/h | 67.1 | 61.0 | 58.3 | 84.8 | 75.9 | 73.4 | 68.8 | 70.1 | 84.8 | 83.7 | 81.3 | 82.8 |
| CTG output, MW | 102.5 | 90.5 | 85.3 | 102.5 | 90.5 | 85.3 | 104.5 | 107.0 | 102.5 | 104.5 | 99.3 | 107.0 |
| CO2, tons/MWH per CTG Gross Ouput | 0.654 | 0.674 | 0.683 | 0.827 | 0.839 | 0.860 | 0.658 | 0.656 | 0.827 | 0.801 | 0.819 | 0.774 |
| Estimated STG output, MW | 83.5 | 87.8 | 83.6 | 141.0 | 136.6 | 132.9 | 94.2 | 98.7 | 141.0 | 143.2 | 139.3 | 140.4 |
| CO2, tons/MBtu (LHV) (emissions per CTG+DB Heat Input) | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 |
| CO2, tons/MBtu (HHV) (emissions per CTG+DB Heat Input) | 0.058 | 0.058 | 0.058 | 0.058 | 0.058 | 0.058 | 0.058 | 0.058 | 0.058 | 0.058 | 0.058 | 0.058 |
| CO2, tons/MWH per Total Gross Power Block | 0.4648 | 0.4541 | 0.4585 | 0.4902 | 0.4782 | 0.4836 | 0.4537 | 0.4486 | 0.4902 | 0.4753 | 0.4814 | 0.4671 |
| | | | | 57.5 | 48.8 | 49.2 | | | | | | |
| † Note: includes CO2 emissions from CTG and duct burner. | | | | | | | | | | | | |
| PM10 WITHOUT THE EFFECTS OF SO2 OXIDATION † | | | | | | | | | | | | |
| PM10 EMISSIONS - FRONT HALF CATCH ONLY | | | | | | | | | | | | |
| PM10, lb/h | 2.7 | 2.7 | 2.7 | 4.2 | 4.0 | 4.0 | 2.7 | 2.7 | 4.2 | 4.0 | 4.0 | 3.8 |
| PM10, lb/MBtu (LHV) (incl. duct burner fuel) | 0.0026 | 0.0028 | 0.0030 | 0.0032 | 0.0034 | 0.0035 | 0.0025 | 0.0025 | 0.0032 | 0.0031 | 0.0032 | 0.0029 |
| PM10, lb/MBtu (HHV) (incl. duct burner fuel) | 0.0023 | 0.0026 | 0.0027 | 0.0029 | 0.0030 | 0.0032 | 0.0023 | 0.0022 | 0.0029 | 0.0028 | 0.0028 | 0.0026 |
| PM10 EMISSIONS - FRONT AND BACK HALF CATCH | | | | | | | | | | | | |
| PM10, lb/h | 5.3 | 5.3 | 5.3 | 8.4 | 7.9 | 7.9 | 5.3 | 5.3 | 8.4 | 7.9 | 7.9 | 7.5 |
| PM10, lb/MBtu (LHV) (incl. duct burner fuel) | 0.0051 | 0.0056 | 0.0058 | 0.0063 | 0.0067 | 0.0069 | 0.0049 | 0.0048 | 0.0063 | 0.0060 | 0.0062 | 0.0058 |
| PM10, lb/MBtu (HHV) (incl. duct burner fuel) | 0.0046 | 0.0050 | 0.0053 | 0.0057 | 0.0060 | 0.0062 | 0.0045 | 0.0044 | 0.0057 | 0.0054 | 0.0056 | 0.0052 |
| † Note: PM10 based on CTG manufacturer estimate and includes duct burner PM10. | | | | | | | | | | | | |
| PM10 WITH THE EFFECTS OF SO2 OXIDATION [INCLUDES MAX. (NH4)2-(SO4)] † | | | | | | | | | | | | |
| PM10 EMISSIONS - FRONT HALF CATCH ONLY | | | | | | | | | | | | |
| PM10, lb/h | 2.8 | 2.8 | 2.8 | 4.4 | 4.1 | 4.1 | 2.8 | 2.8 | 4.4 | 4.2 | 4.2 | 4.0 |
| PM10, lb/MBtu (LHV) (incl. duct burner fuel) | 0.0027 | 0.0030 | 0.0031 | 0.0033 | 0.0035 | 0.0036 | 0.0026 | 0.0026 | 0.0033 | 0.0032 | 0.0033 | 0.0031 |
| PM10, lb/MBtu (HHV) (incl. duct burner fuel) | 0.0024 | 0.0027 | 0.0028 | 0.0030 | 0.0031 | 0.0033 | 0.0024 | 0.0023 | 0.0030 | 0.0029 | 0.0030 | 0.0028 |
| PM10 EMISSIONS - FRONT AND BACK HALF CATCH | | | | | | | | | | | | |
| PM10, lb/h | 5.4 | 5.4 | 5.4 | 8.5 | 8.0 | 8.1 | 5.4 | 5.4 | 8.6 | 8.1 | 8.1 | 7.7 |
| PM10, lb/MBtu (LHV) (incl. duct burner fuel) | 0.0052 | 0.0057 | 0.0060 | 0.0065 | 0.0068 | 0.0070 | 0.0051 | 0.0050 | 0.0065 | 0.0062 | 0.0064 | 0.0059 |
| PM10, lb/MBtu (HHV) (incl. duct burner fuel) | 0.0047 | 0.0051 | 0.0054 | 0.0058 | 0.0061 | 0.0063 | 0.0046 | 0.0045 | 0.0058 | 0.0056 | 0.0058 | 0.0054 |
| † Note: PM10 based on CTG manufacturer estimate and includes duct burner PM10, and (NH4)2(SO4) as front half catch (assuming 100% conversion from SO3 to (NH4)2(SO4)). | | | | | | | | | | | | |
| PM2.5 WITHOUT THE EFFECTS OF SO2 OXIDATION † | | | | | | | | | | | | |
| PM2.5 EMISSIONS - FRONT HALF CATCH ONLY | | | | | | | | | | | | |
| PM2.5, lb/h | 2.7 | 2.7 | 2.7 | 4.2 | 4.0 | 4.0 | 2.7 | 2.7 | 4.2 | 4.0 | 4.0 | 3.8 |
| PM2.5, lb/MBtu (LHV) (incl. duct burner fuel) | 0.0026 | 0.0028 | 0.0030 | 0.0032 | 0.0034 | 0.0035 | 0.0025 | 0.0025 | 0.0032 | 0.0031 | 0.0032 | 0.0029 |
| PM2.5, lb/MBtu (HHV) (incl. duct burner fuel) | 0.0023 | 0.0026 | 0.0027 | 0.0029 | 0.0030 | 0.0032 | 0.0023 | 0.0022 | 0.0029 | 0.0028 | 0.0028 | 0.0026 |
| PM2.5 EMISSIONS - FRONT AND BACK HALF CATCH | | | | | | | | | | | | |
| PM2.5, lb/h | 5.3 | 5.3 | 5.3 | 8.4 | 7.9 | 7.9 | 5.3 | 5.3 | 8.4 | 7.9 | 7.9 | 7.5 |
| PM2.5, lb/MBtu (LHV) (incl. duct burner fuel) | 0.0051 | 0.0056 | 0.0058 | 0.0063 | 0.0067 | 0.0069 | 0.0049 | 0.0048 | 0.0063 | 0.0060 | 0.0062 | 0.0058 |
| PM2.5, lb/MBtu (HHV) (incl. duct burner fuel) | 0.0046 | 0.0050 | 0.0053 | 0.0057 | 0.0060 | 0.0062 | 0.0045 | 0.0044 | 0.0057 | 0.0054 | 0.0056 | 0.0052 |

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|--|---|---|---|----|----|----|----|----|----|----|----|----|
| † Note: PM2.5 based on CTG manufacturer estimate and includes duct burner PM2.5. | | | | | | | | | | | | |

| CASE NUMBER | 1 | 2 | 3 | 31 | 32 | 33 | 13 | 16 | 17 | 18 | 19 | 21 |
|---|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| TOTAL EFFECTS OF SO2 OXIDATION | | | | | | | | | | | | |
| Total SO2 to SO3 conversion rate, %vol | 34.0 | 34.0 | 34.0 | 31.6 | 31.8 | 31.6 | 34.0 | 34.0 | 38.4 | 38.8 | 38.7 | 39.0 |
| Total Amount of SO2 converted to SO3, lb/h | 0.07 | 0.06 | 0.06 | 0.08 | 0.07 | 0.07 | 0.07 | 0.07 | 0.09 | 0.09 | 0.09 | 0.09 |
| Maximum Stack Ammonium Sulfate [(NH4)2-(SO4)] (assuming 100% conversion from SO3), lb/h | 0.13 | 0.12 | 0.12 | 0.16 | 0.14 | 0.14 | 0.14 | 0.14 | 0.19 | 0.19 | 0.18 | 0.19 |
| Maximum Stack Sulfur Mist [H2SO4] (assuming 100% conversion from SO3 to H2SO4), lb/h | 0.10 | 0.09 | 0.09 | 0.12 | 0.11 | 0.10 | 0.10 | 0.10 | 0.14 | 0.14 | 0.14 | 0.14 |
| POST COMBUSTION EMISSIONS CONTROL EQUIPMENT | | | | | | | | | | | | |
| CATALYTIC CONVERSION IN CO CATALYST | | | | | | | | | | | | |
| CO removed in CO Catalyst, %wt | 35.1 | 35.1 | 35.1 | 35.1 | 35.1 | 35.1 | 35.1 | 35.1 | 35.1 | 35.1 | 35.1 | 35.1 |
| CO removed in CO Catalyst, lb/h | 8.3 | 7.2 | 6.8 | 13.7 | 11.7 | 11.4 | 7.3 | 7.0 | 13.7 | 11.8 | 11.5 | 10.8 |
| VOC removed in CO Catalyst, %wt | 46.4 | 46.4 | 46.4 | 46.4 | 46.4 | 46.4 | 46.4 | 46.4 | 46.4 | 46.4 | 46.4 | 46.4 |
| VOC removed in CO Catalyst, lb/h | 1.0 | 0.9 | 0.8 | 2.4 | 2.1 | 2.0 | 0.9 | 0.9 | 2.4 | 2.1 | 2.1 | 1.9 |
| SELECTIVE CATALYTIC REDUCTION (SCR) | | | | | | | | | | | | |
| NOx Removed in SCR, %wt | 92.9 | 92.9 | 92.9 | 92.1 | 92.1 | 92.1 | 92.9 | 92.9 | 92.1 | 92.2 | 92.2 | 92.3 |
| NOx removed in SCR, lb/h | 162.5 | 147.9 | 141.3 | 184.1 | 166.0 | 159.6 | 167.0 | 170.3 | 184.1 | 184.8 | 178.9 | 185.4 |
| Ammonia Slip, lb/h | 15.4 | 14.0 | 13.4 | 19.5 | 17.5 | 16.9 | 15.8 | 16.1 | 19.5 | 19.3 | 18.7 | 19.0 |
| NH3 Reagent Type | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) | Aqueous (19%) |
| Assumed stoichiometric ratio for NH3 consumption | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 | 1.4 |
| Total NH3 Reagent Consumption, lb/h | 525 | 477 | 456 | 605 | 545 | 524 | 539 | 550 | 605 | 605 | 586 | 606 |
| ESTIMATED SULFURIC ACID STACK DEW POINT TEMPERATURE | | | | | | | | | | | | |
| MAXIMUM OF ALL METHODS BELOW | | | | | | | | | | | | |
| Sulfuric Acid Dewpoint, ° F | 190 | 194 | 197 | 195 | 198 | 201 | 202 | 205 | 197 | 207 | 208 | 209 |
| OKKES METHOD † | | | | | | | | | | | | |
| Sulfuric Acid Dewpoint, ° F | 190 | 194 | 197 | 195 | 198 | 201 | 202 | 205 | 197 | 207 | 208 | 209 |
| † Note: valid for dewpoint temperatures ≥ 220° F (105° C). Source: A.G. Okkes, "Get acid dew point of flue gas", Hydrocarbon Processing, July 1987, pp. 53-55. | | | | | | | | | | | | |
| PIERCE METHOD † | | | | | | | | | | | | |
| Sulfuric Acid Dewpoint, ° F | 172 | 176 | 179 | 178 | 181 | 184 | 185 | 188 | 180 | 191 | 193 | 193 |
| † Note: max. deviation 7° C. Equation does not reduce to the dew point of H2O when SO3 is zero. In the range of 121-100° C, the experimental dew points are 2.5-4.0° C (4.5-7.2° F) low. Caution for SO3 range below 10 ppmv. Source: Robert R. Pierce, "Estimating acid dewpoints in stack gases", Chemical Engineering, April 11, 1977, pp. 125-128. | | | | | | | | | | | | |
| KIANG METHOD † | | | | | | | | | | | | |
| Sulfuric Acid Dewpoint, ° F | 171 | 175 | 178 | 177 | 180 | 183 | 184 | 187 | 180 | 190 | 192 | 193 |
| † Note: Equation Nooter/Eriksen uses with 6% SO2-SO3 conversion rate (always at atmospheric pressure), given by Shaun Hennessey; Better predicts dew point temperatures at lower temperatures. Source: Yen-Hsiung Kiang, "Predicting dewpoints of acid gases", Chemical Engineering, February 9, 1981, p. 127. | | | | | | | | | | | | |
| ZARENEZHAD METHOD | | | | | | | | | | | | |
| Sulfuric Acid Dewpoint, ° F | 151 | 155 | 158 | 158 | 161 | 164 | 164 | 168 | 161 | 172 | 174 | 174 |
| Source: Correlation developed by Bahman Zarenezhad, "New correlation predicts dewpoints of acidic combustion gases", Oil & Gas Journal, Volume 107, 2011. | | | | | | | | | | | | |

GT3 and GT 4 Units CO2 Preliminary Comparison

| Current Operations Unit 3&4 (CTG Basis - GE/Caldwell) | | | | | | | Capacity Increase Estimates Modification(CTG Basis - GE/Caldwell) | | | |
|---|---------------------|--|---------------------|--|--|--|---|--|---|--|
| Scenario | Duration -Year 2021 | Representative Ambient Temperature, °F | Description | Average CO2 T/MWH (on Power Block Basis) | Average CO2 T/MMBtu (Total Heat Input Basis) | Representative Ambient Temperature, °F | Description | Average CO2 T/MWH (on Power Block Basis) | Average CO2 T/MMBtu(Total Heat Input HHV Basis) | |
| 1 Scenario 1 | Jan, Feb, March | 0 | Unfired | 0.465 | 0.0594 | 0 | Unfired | 0.465 | 0.0578 | |
| 2 Scenario 2 | April, May, October | 59 | Fired | 0.467 | 0.0594 | 59 | Fired | 0.457 | 0.0578 | |
| 3 Scenario 3 | June, September | 90 | Fired | 0.472 | 0.0594 | 90 | Fired | 0.462 | 0.0578 | |
| 4 Scenario 4 | July, August | 90 | Peak Load WC, Fired | 0.472 | 0.0594 | 90 | Peak Load WC, Fired | 0.455 | 0.0578 | |
| 5 Scenario 5 | November, December | 0 | Unfired | 0.465 | 0.0594 | 0 | Unfired | 0.465 | 0.0578 | |
| | Annual Average | | | 0.469 | 0.0594 | | | 0.459 | 0.0578 | |

Notes

1. Above estimates are preliminary.
2. The capacity increase CO2 emission estimates are based on OSP monthly average fuel gas analysis and based on GE/Caldwell gas turbine performance and emissions data.
3. The CO2 T/MWH levels for capacity increase cases have been adjusted to approximately similar duct firing as PI data provided for 2021.
4. The heat input provided in Unit PI data is assumed to be on HHV basis.
5. The scenarios and corresponding ambient temperatures are based on OSP (Scott Weis) email on July 21st 2022 and duct firing levels correspond to 27 MW increase in ST output.
6. The Annual emissions represents weighted average of CO2 emissions across the year.

EXHIBIT 3



On the Horizon

2022 Regional Electricity Outlook

ISO



25 years

new england

Keeping Electricity Flowing Across the Region

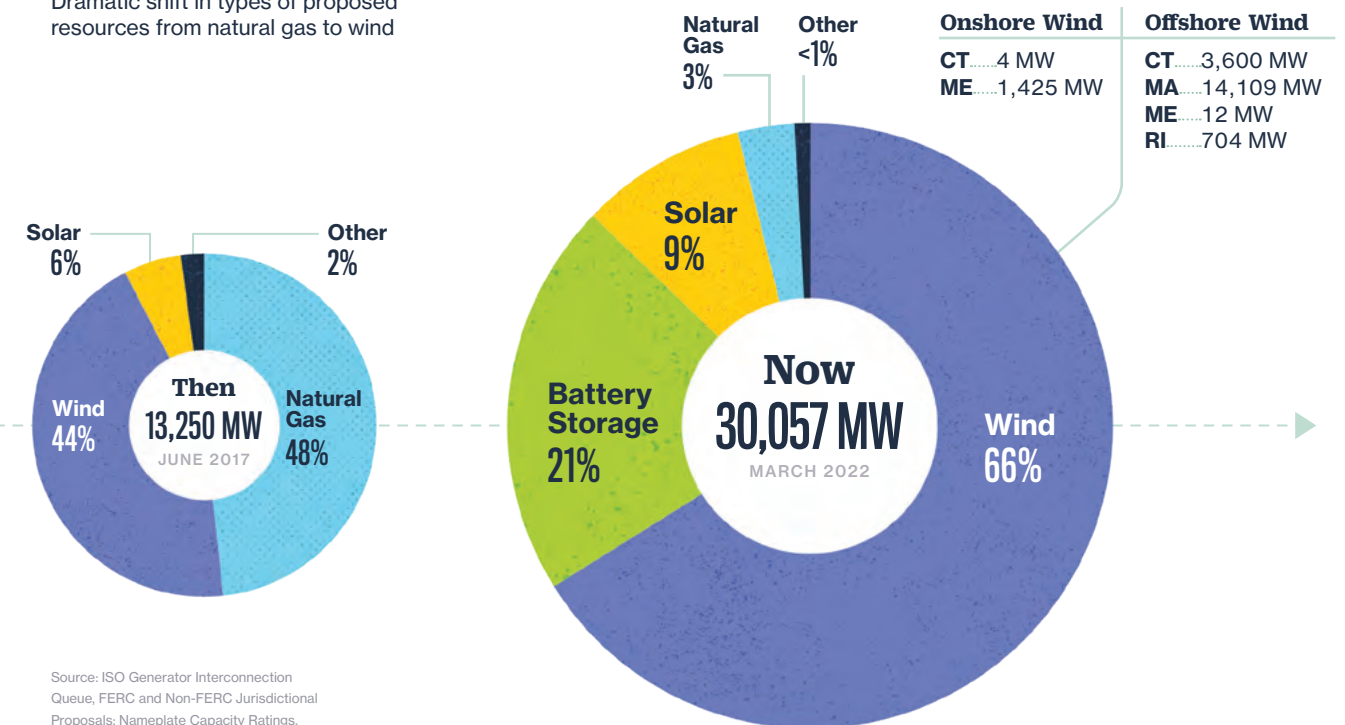


→ **The ISO remains certain** that some resources will be necessary to balance renewable energy on a routine basis. This fleet of balancing resources will keep energy flowing when intermittent resources aren't able to run, ensuring a greener future grid that New Englanders can rely on to power their lives.

Stakeholders are currently determining if a consensus can be reached on market approaches to spur the development of clean energy. It's also necessary for the region's energy stakeholders to consider how balancing resources will be compensated for their reliability value in a future system with significant amounts of renewable resources. This is particularly critical as older, fuel secure resources seek to retire.

The ISO Generator Interconnection Queue Provides Snapshots of the Future Resource Mix

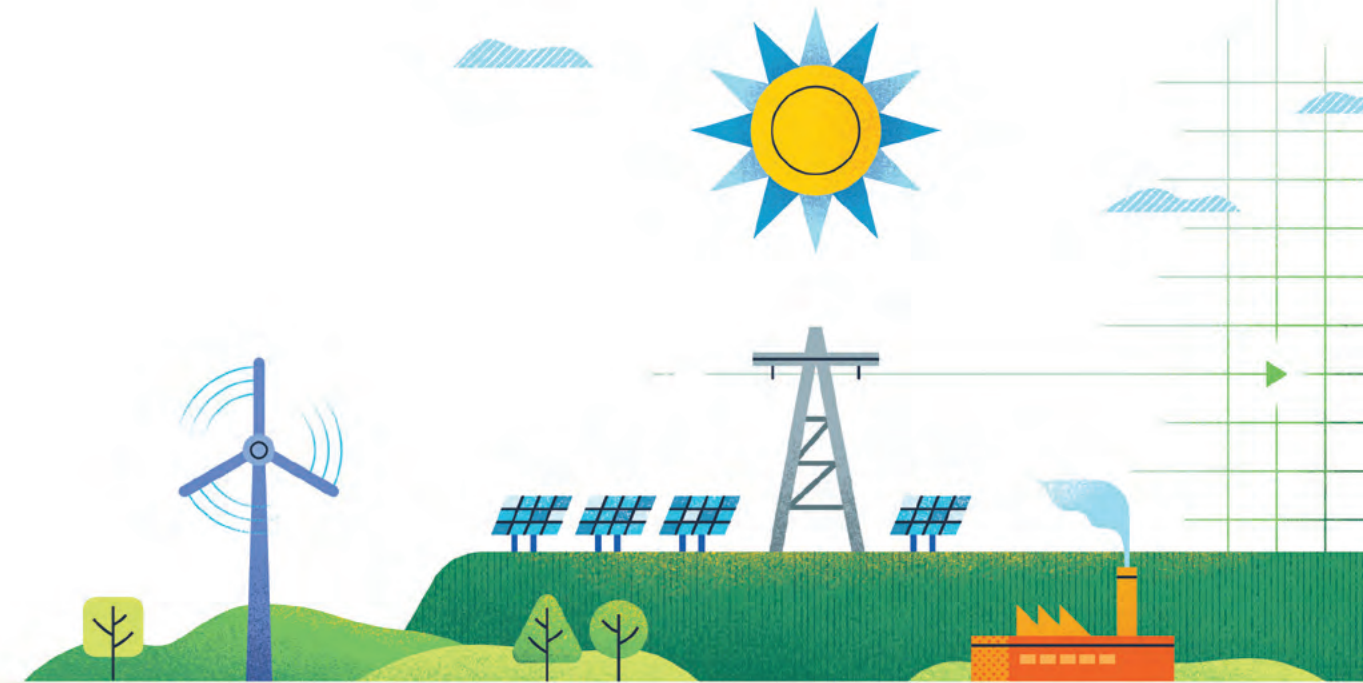
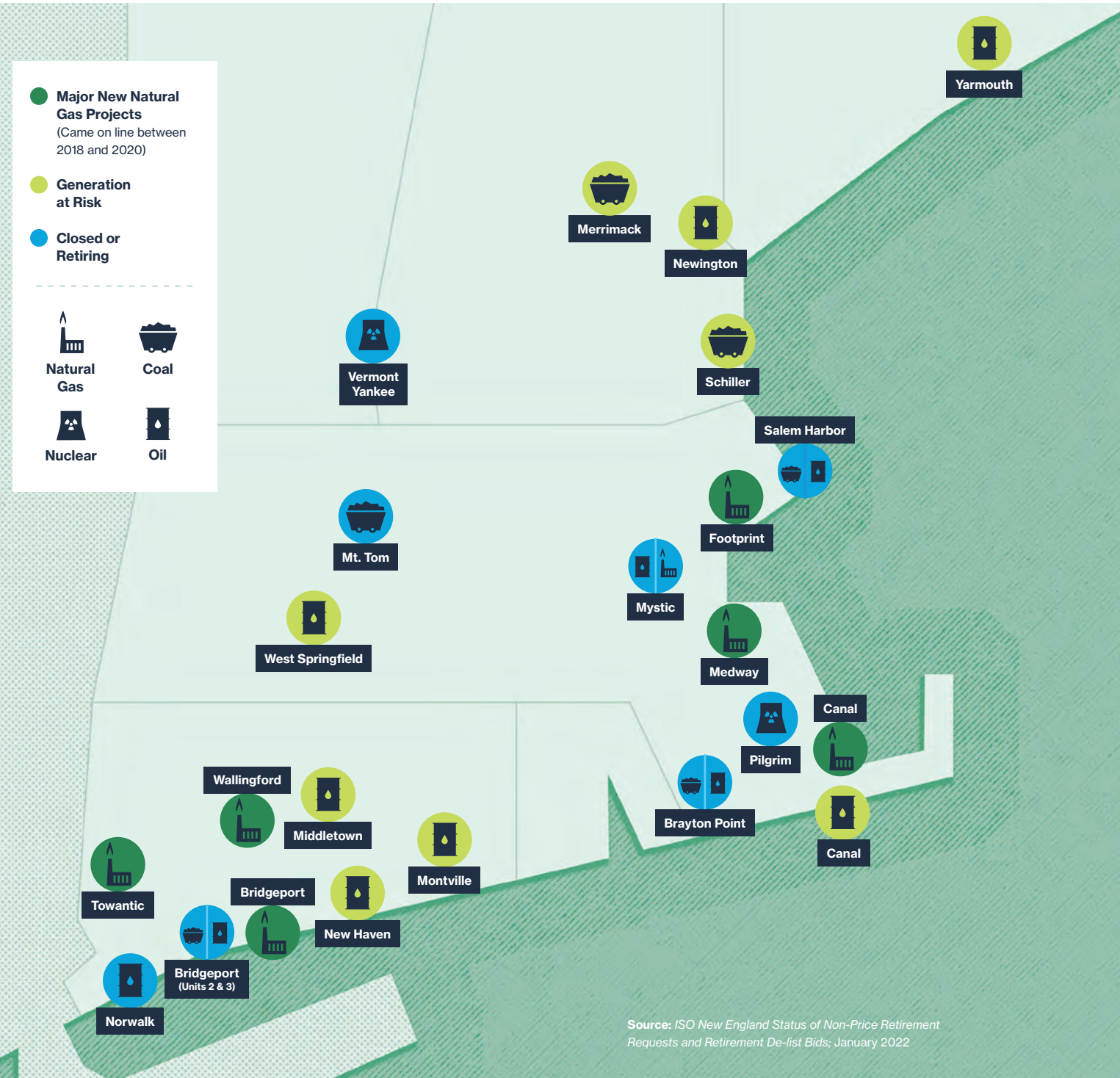
Dramatic shift in types of proposed resources from natural gas to wind



Source: ISO Generator Interconnection Queue, FERC and Non-FERC Jurisdictional Proposals; Nameplate Capacity Ratings.

Since 2013, Roughly 7,000 MW of Generation Have Retired or Announced Plans for Retirement in the Coming Years

- ▶ Predominantly coal, oil, and nuclear resources
- ▶ Another 5,000 MW of remaining coal and oil are at risk of retirement
- ▶ These resources have played an important role in recent winters when natural gas supplies are constrained in New England



Supporting a Reliable Transition to Clean Energy

Reliability is the focus of key initiatives the ISO is working on with stakeholders.

In **The Future Grid Reliability Study (FGRS)**, ISO staff are studying how our regional grid will operate when it is powered primarily by renewable resources and serving significantly increased demand. The FGRS examines 24 different future grid scenarios, developed through stakeholder discussions, to better understand the implications for reliability when most of the electricity in the region comes from weather-dependent resources. Phase one of the study was launched in March 2021, with results expected in summer 2022.

Another project, known as **Resource Capacity Accreditation**, is focused on developing ways to more accurately reflect a generator's contributions to resource adequacy, which will be critical to a reliable and efficient clean energy transition.

A third project, **Day-Ahead Ancillary Services**, seeks to ensure the market is providing the services needed for a reliable, next-day power system operating plan with the region's evolving generation fleet.

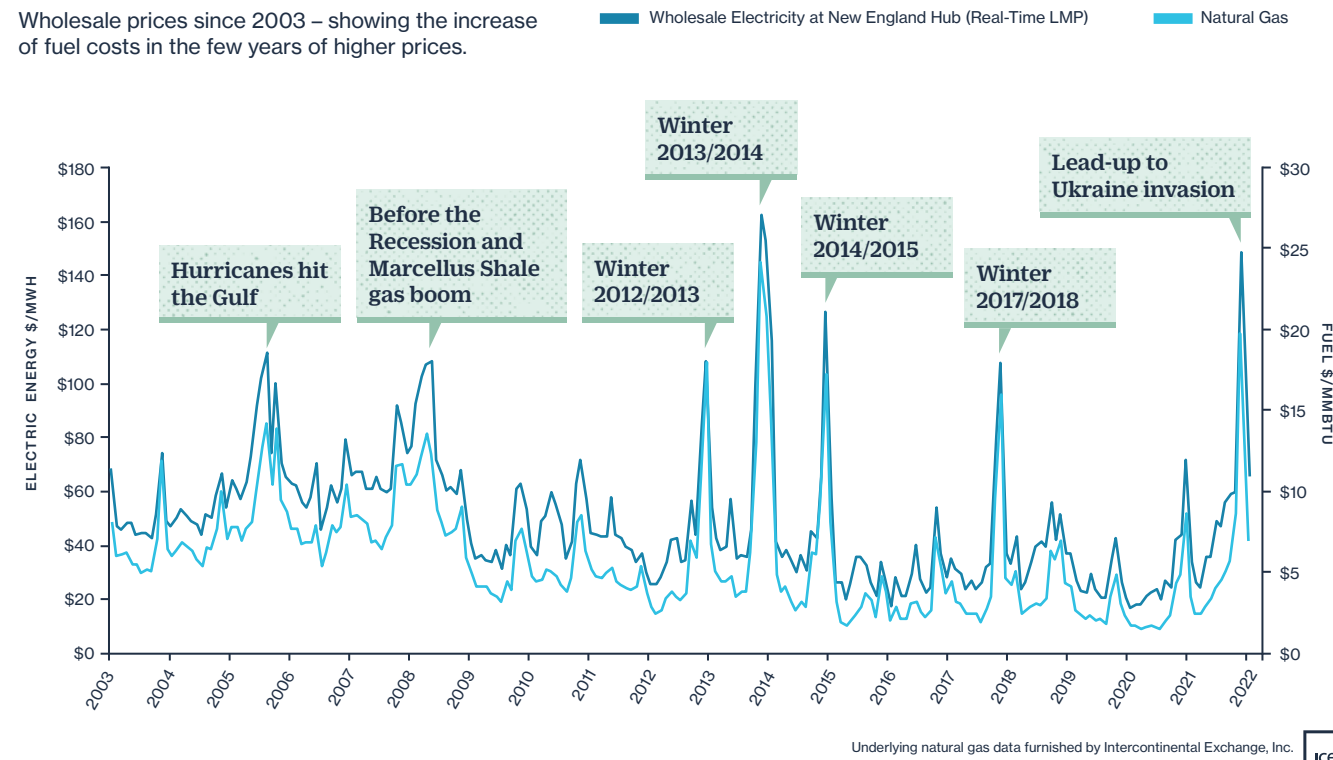
➔ **As the region's power generation fleet transforms** over the coming decades, the competitive wholesale markets will become even more critical to ensuring that balancing resources—in particular, generation that can produce electricity on demand, as well as different types of storage, which rely primarily on market revenues—remain viable to support the demands of the future grid.

New England has a successful track record of developing wholesale markets that deliver on regional policy objectives. In the late 1990s, that objective was lower cost – and over the past 25 years, the wholesale markets we designed have largely achieved it. We believe a robust marketplace, one that fosters wholesale competition and efficient economic outcomes among new and existing resources, can meet the region's evolving objectives to decarbonize the electricity sector while maintaining system reliability.



Prices Reflect the Cost of Inputs

Wholesale prices since 2003 – showing the increase of fuel costs in the few years of higher prices.



Wholesale Markets and the Future Grid



New England's energy future relies on a foundation of stakeholder input and consensus. Our energy stakeholders will determine how wholesale markets will be used to reliably achieve our clean energy goals.

How will we pay for clean energy—by rewarding clean energy attributes, pricing carbon emissions, or a combination of both?

We will also need to gain consensus on the reliability benefits of balancing resources and determine how to maintain their financial certainty.

Long-term market mechanisms for decarbonizing the energy system are presented in the *Pathways to a Future Grid* report.



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isoexpress.iso-ne.com



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EXHIBIT 4



Net-Zero New England: Ensuring Electric Reliability in a Low-Carbon Future

November 2020

Jointly prepared by:



Energy+Environmental Economics



ENERGY FUTURES
— INITIATIVE —

Project Team

This report was produced in collaboration between E3 and EFI and sponsored by Calpine Corporation. While Calpine provided input and perspectives regarding the study scope and analysis, all decisions regarding the analysis were made by E3 and EFI. Thus, this report solely reflects the research, analysis, and conclusions of the E3 and EFI study authors.

Energy and Environmental Economics, Inc. (E3) is a leading economic consultancy focused on the clean energy transition. E3's analysis is utilized by the utilities, regulators, developers, and advocates that are writing the script for the emerging clean energy transition in leading-edge jurisdictions such as California, New York, Hawaii and elsewhere. E3 has offices in San Francisco, Boston, New York, Calgary, and Raleigh.

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The Energy Futures Initiative, Inc. (EFI) is a nonprofit clean energy think tank dedicated to harnessing the power of innovation—both in technology and policy—to create clean energy jobs, grow economies, enhance national and global energy security, and address the imperatives of climate change. EFI was founded in Washington, DC by former Energy Secretary Ernest Moniz. The EFI team and its global network of experts provides policymakers, industry leaders, NGOs and other leaders with analytically based, unbiased policy options to advance a cleaner, safer, more affordable and more secure energy future. The majority of project funding is derived from charitable and educational nonprofit institutions. EFI maintains editorial independence from its public and private sponsors.

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Advisory Group

The report authors greatly benefited from the advice and feedback of an Advisory Group comprising a diverse group of stakeholders with relevant expertise for this project and chaired by former energy secretary Ernest Moniz. Participation on the Advisory Group does not imply endorsement of any of the report's conclusions.

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Table of Contents

| | |
|--|-----------|
| Executive Summary | 1 |
| Key Findings..... | 2 |
| 1 Introduction | 7 |
| 1.1 Study Motivation..... | 7 |
| 1.2 Goals of this Study..... | 8 |
| 1.3 Study Design..... | 9 |
| 1.4 Report Contents..... | 10 |
| 2 Context | 11 |
| 2.1 Electricity System Reliability..... | 11 |
| 2.2 New England’s Greenhouse Gas Emissions..... | 12 |
| 2.3 Additional Policy Context..... | 15 |
| 3 Modeling Approach | 20 |
| 3.1 Scenario Development..... | 20 |
| 3.2 Modeling Framework..... | 21 |
| 3.3 New England PATHWAYS Model..... | 21 |
| 3.4 New England RESOLVE Model..... | 25 |
| 3.5 New England RECAP Model..... | 31 |
| 4 Results | 37 |
| 4.1 Economy-wide Decarbonization Pathways..... | 37 |
| 4.2 Electricity Generation Portfolios..... | 40 |
| 4.3 Resource Adequacy Summary..... | 43 |
| 4.4 Electricity Sector Costs..... | 50 |
| 4.5 Sensitivity Results..... | 52 |
| 4.6 Effects of Limiting Natural Gas Capacity or Availability of Emerging Technologies..... | 54 |
| 4.7 Environmental Justice Implications of the Modeling Results..... | 58 |
| 5 Innovation Opportunities for Getting to Net-Zero | 60 |
| 5.1 The Net-Zero Challenge..... | 60 |
| 5.2 Carbon Dioxide Removal Potential in New England..... | 60 |
| 5.3 A New England Innovation Agenda..... | 64 |

| | | |
|----------|--|------------|
| 5.4 | Regional Innovation Priorities | 67 |
| 6 | Conclusions..... | 71 |
| 7 | Appendices | 74 |
| 7.1 | Detailed PATHWAYS Assumptions | 74 |
| 7.2 | Load Shape Development..... | 80 |
| 7.3 | Additional Economy-wide PATHWAYS Results..... | 88 |
| 7.4 | New England Reliability (RECAP) Model Assumptions..... | 90 |
| 7.5 | New England Capacity Expansion (RESOLVE) Model Assumptions..... | 94 |
| 7.6 | Detailed RESOLVE Results | 100 |
| 7.7 | Additional Detail on Regional Innovation Priority Areas and Assets | 103 |
| 8 | References..... | 114 |

Table of Figures

| | |
|---|----|
| Figure 1-1. State Economy-wide Greenhouse Gas Emissions Reduction Targets | 8 |
| Figure 1-2. Study Design | 9 |
| Figure 2-1. Historical Economy-wide GHG Emissions by State Since 1990..... | 12 |
| Figure 2-2. Carbon Dioxide Emissions from Fossil Fuel Combustion in New England Since 1990..... | 13 |
| Figure 2-3. 2016 Greenhouse Gas Emissions in New England (MMT)..... | 14 |
| Figure 2-4. 2016 Greenhouse Gas Emissions Profile for New England and United States | 14 |
| Figure 2-5. Protected Land in New England” | 18 |
| Figure 2-6. Geological Sequestration Resources in the United States near New England | 19 |
| Figure 3-1. Modeling Approach | 21 |
| Figure 3-2. Illustration of PATHWAYS Model Framework | 22 |
| Figure 3-3. Illustrative Device Lifetimes for Stock Rollover Methodology in PATHWAYS | 23 |
| Figure 3-4. Overview of RESOLVE Model..... | 25 |
| Figure 3-5. Land Use Associated with Utility-Scale Solar and Onshore Wind Implied from NREL ReEDS Technical Potential and Study Farmland and Forest Screens used in Base Case | 29 |
| Figure 3-6. Example of New Transmission Build to Integrate Maine Onshore Wind | 30 |
| Figure 3-7. Renewable Supply Curve Based on 2050 Resource Costs | 31 |
| Figure 3-8. Overview of RECAP Model..... | 33 |
| Figure 3-9. Overview of RECAP Modeling Process..... | 34 |
| Figure 3-10. Use of RECAP in the Analysis | 34 |
| Figure 3-11. Overview of Methodological Steps to Calculate Resource ELCC | 36 |
| Figure 4-1. New England Pillars of Decarbonization..... | 37 |
| Figure 4-2. Reductions in Economy-wide GHG Emissions Reductions by Sector Through 2050 | 38 |
| Figure 4-3. Expected Load Growth by Scenario..... | 39 |
| Figure 4-4. Electric Peak Load Forecast | 40 |
| Figure 4-5. Capacity Additions and Retirements | 42 |
| Figure 4-6. Total Resource Portfolio | 42 |

| | |
|--|----|
| Figure 4-7. Total Electricity Generation..... | 43 |
| Figure 4-8. Loss-of-Load Probability Distribution by Month-Hour (High Electrification Scenario)..... | 44 |
| Figure 4-9. Illustrative Dispatch over a Typical Week in 2050 (High Electrification Scenario) | 45 |
| Figure 4-10. Illustrative Dispatch over a Critical Week in 2050 (High Electrification Scenario) | 46 |
| Figure 4-11. Illustrative Dispatch over a Critical Week in 2050 (No Combustion Resources with High Electrification Scenario)..... | 47 |
| Figure 4-12. Gas Units (CC/CT) Capacity Factor Results | 48 |
| Figure 4-13. Wind ELCC in 2050 (High Electrification Scenario) | 49 |
| Figure 4-14. 4-hr Storage ELCC in 2050 (High Electrification Scenario)..... | 49 |
| Figure 4-15. Non-Coincidence of Solar and Load in 2050..... | 50 |
| Figure 4-16. RESOLVE Modeled Costs Relative to Reference Case (High Electrification Loads)..... | 51 |
| Figure 4-17. Sensitivity Results: Total Installed Capacity in 2050..... | 53 |
| Figure 4-18. Sensitivity Results: Effective Capacity in 2050..... | 54 |
| Figure 4-19. Sensitivity Results Limiting/Expanding Firm Capacity Options: Total Installed Capacity in 2050 (High Electrification Scenario)..... | 56 |
| Figure 4-20. Increase in Electricity System Modeled Costs Relative to Reference Case, Including Limited/Expanded Firm Capacity Options Across Selected Set of Scenarios in 2050 (High Electrification) | 57 |
| Figure 4-21. Average Cost of Carbon Abatement (High Electrification Loads) | 58 |
| Figure 5-1. Opportunities for Carbon Dioxide Removal | 60 |
| Figure 5-2. Ranges for Natural CDR Potential in New England..... | 64 |
| Figure 5-3. DOE Grantees and Clean Energy Research Centers in New England..... | 67 |
| Figure 7-1. United States Projected National Biomass Feedstock Supply in 2050 | 78 |
| Figure 7-2. Potential Hydrogen Production Sources for New England (Not Exhaustive) | 79 |
| Figure 7-3. Hydrogen Delivery Cost Range (\$/MMBTU)..... | 80 |
| Figure 7-4. COP as a Function of Outdoor Air Temperature for the Four Heat Pump Technologies Considered in this Study..... | 82 |
| Figure 7-5. Heat Pump Technologies Adopted for Residential and Commercial Space Heating..... | 84 |
| Figure 7-6. Illustrative Weekly Driving Profile Generated for Representative Set of LDV Drivers using the Markov Chain Methodology | 85 |

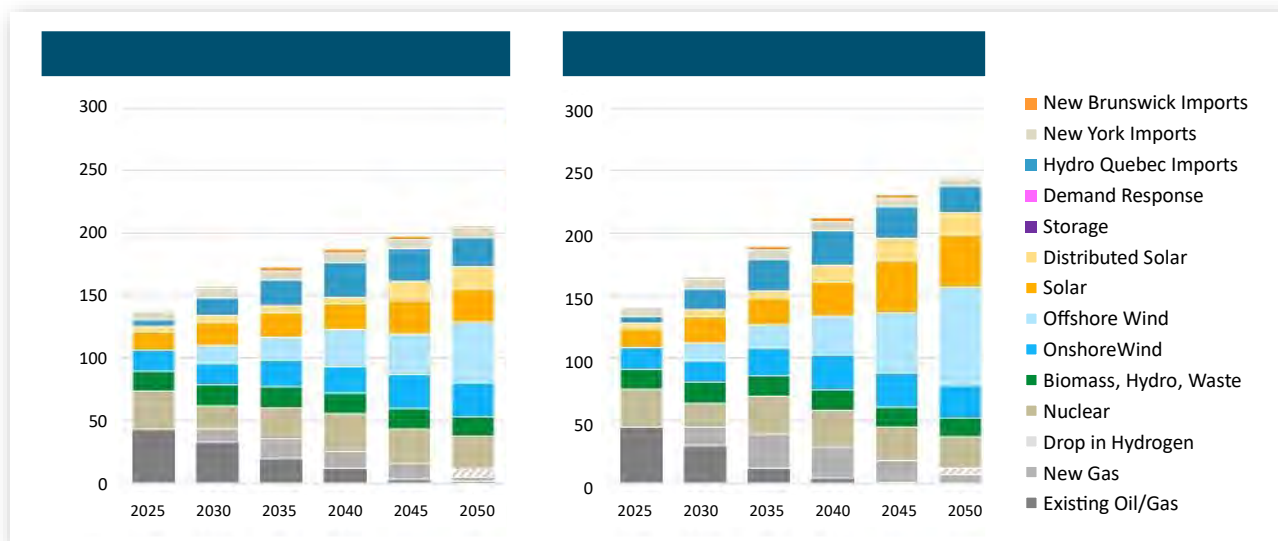
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| Figure 7-7. Representative Unmanaged Personal Light-Duty EV Load Shape for New England | 86 |
| Figure 7-8. Impacts of EV Load Shifting from Managed Charging in 2040 | 86 |
| Figure 7-9. Real and Simulated New England System Load..... | 88 |
| Figure 7-10. Final Energy Use by Scenario, 2020-2050..... | 89 |
| Figure 7-11. Assumed New Light Duty Vehicle Share of Sales (left) and Resulting Stocks (right), High Electrification and High Fuels Scenarios (Both) | 90 |
| Figure 7-12. Residential Space Heating Stocks in High Electrification (left), High Fuels (right) Scenarios | 90 |
| Figure 7-13. Solar (yellow dots) and Wind (blue dots) Sites used to Generate Hourly Generation Profiles | 91 |
| Figure 7-14. Historical Hydro Generation by Month. Includes Generation from Run-of-River, Pondage and Reservoir Hydro | 92 |
| Figure 7-15. Renewable Generation Profile Selection Process..... | 94 |
| Figure 7-16. New England Baseline Transmission Topology in RESOLVE | 95 |
| Figure 7-17. Assumed Natural Gas Price Forecast - Annual (left) and Monthly (right) | 95 |
| Figure 7-18. Marginal Carbon Abatement Costs (High Electrification Loads) | 103 |

Abbreviations

| | |
|----------------------------|---|
| RPS | Renewable Portfolio Standard |
| TCI | Transportation Climate Initiative |
| EEPS | Energy Efficiency Portfolio Standard |
| EIA | U.S. Energy Information Administration |
| EPA | U.S. Environmental Protection Agency |
| SIT | EPA's State Inventory Tool |
| SEDS | EIA's State Energy Data System |
| IPCC | Intergovernmental Panel on Climate Change |
| ISO-NE | Independent System Operator-New England |
| CELT | ISO-NE's annual Capacity, Energy, Loads and Transmission Report |
| NEG-ECP | New England Governors and Eastern Canadian Premiers |
| NEPOOL | New England Power Pool |
| NYSERDA | New York State Energy Research and Development Authority |
| FAA | Federal Aviation Administration |
| CLEEN | FAA's Continuous Lower Energy, Emissions and Noise Program |
| NREL | National Renewable Energy Laboratory |
| ReEDS | Regional Energy Deployment System, NREL-developed capacity planning model |
| SAM | NREL's System Advisor Model |
| NASEM | National Academies of Science, Engineering and Medicine |
| DOT | Department of Transportation |
| NEMS | EIA's National Energy Modeling System |
| RECS | EIA's Residential Energy Consumption Survey |
| CB ECS | EIA's Commercial Buildings Energy Consumption Survey |
| AEO | EIA's Annual Energy Outlook |
| NEEP | Northeast Energy Efficiency Partnership |
| NOAA | National Oceanic and Atmospheric Administration |
| ARPA-E | Advanced Research Projects Agency - Energy |
| GHG | Greenhouse Gas |
| MMT CO₂e | Million Metric Tons of CO ₂ equivalent |
| VMT | Vehicle Miles Travelled |
| ODS | Ozone Depleting Substance |
| GWP | Global Warming Potential |
| LOLP | Loss of Load Probability |
| LOLE | Loss of Load Expectation |
| PRM | Planning Reserve Margin |
| UCAP | Unforced Capacity |
| ELCC | Effective Load Carrying Capability |
| MTTR | Mean Time to Repair |
| FOF | Forced Outage Factor |

| | |
|----------------|--|
| IPPU | Industrial Processes and Product Use |
| CC/CCGT | Combined Cycle Gas Turbines |
| CT | Combustion Turbines |
| ST | Steam Turbines |
| ZEV | Zero Emission Vehicle |
| EV | Electric Vehicle |
| L/M/HDV | Light/Medium/Heavy Duty Vehicles |
| LED | Light Emitting Diode |
| CDR | Carbon Dioxide Removal |
| CCS | Carbon Capture and Storage |
| BECCS | Bio-Energy with Carbon Capture and Storage |
| DAC | Direct Air Capture |
| SMR | Steam Methane Reforming |
| NSMR | Nuclear Small Modular Reactors |
| AS/GSHP | Air-Source/Ground-Source Heat Pump |
| ccASHP | Cold Climate Air-Source Heat Pump |
| COP | Coefficient of Performance |
| BTM PV | Behind-the-Meter Solar Photovoltaic |
| NECEC | New England Clean Energy Connect |
| CAES | Compressed Air Energy Storage |

Figure 4-7. Total Electricity Generation



4.3 Resource Adequacy Summary

4.3.1 Reliability in New England

The resource portfolios under both the High Electrification and High Fuels scenarios in 2050 are tested after the capacity expansion modeling to confirm they remain reliable. Using RECAP simulations, both portfolios were confirmed to be reliable, generating LOLE values less than 0.1 days/year.[†]

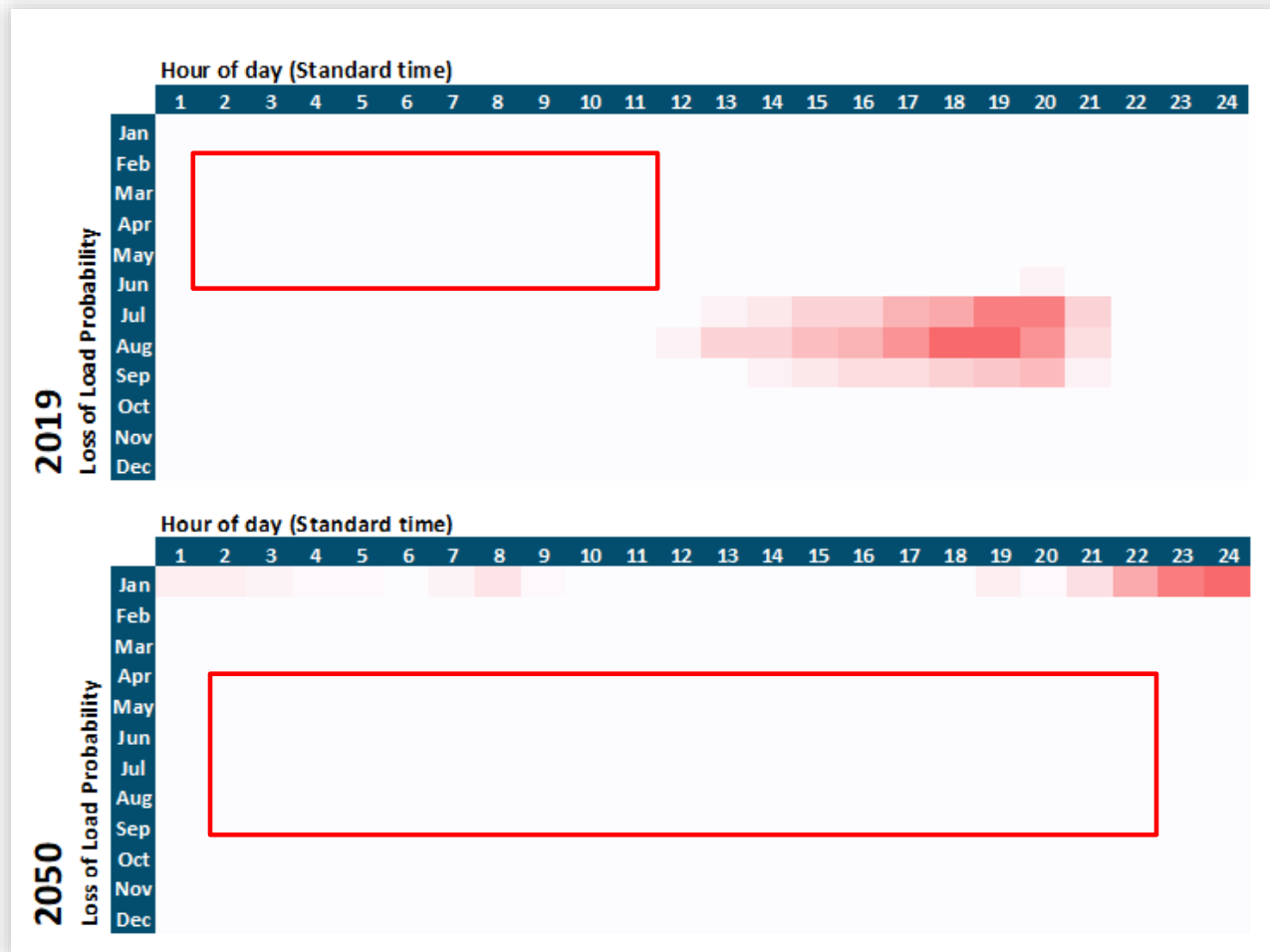
The nature of reliability challenges in 2050 is significantly different from current challenges. Because most existing generation capacity is dispatchable, the biggest reliability challenge is peak load events when there is the greatest probability that loads will exceed available generation. Presently, this typically occurs on hot summer afternoons (Figure 4-8). In the 2050 system where a significant amount of generation is variable or energy-limited, loss-of-load events do not necessarily occur in peak load hours but rather during extended periods where available generation is very low.

In the electricity system portfolios analyzed as part of this analysis, the biggest reliability challenge by 2050 is multi-day periods of low renewable energy production. When renewable energy production is low for only a short period of time (such as at summer nights when solar production is nil), existing energy storage technologies are capable of providing sufficient energy. However, when renewable production is low for a longer period of time (two or more days), limited-duration energy storage is insufficient to provide all required energy. Demand response resources can help mitigate the energy shortfall but

[†] The reliability target of 0.1 days/year for New England in 2050 translates to a target PRM of about 10.2% on an Unforced Capacity (UCAP) basis, which accounts for contributions from all resource types, including thermal, at their respective ELCCs. On an Installed Capacity (ICAP) basis, the target PRM is closer to 15%. The portfolios from both scenarios naturally satisfy the PRM requirement since the resulting LOLE is superior to the target.

practical limitations on magnitude and duration of response limit their contributions. For example, it would be unrealistic to expect a majority of buildings to reduce electricity use for heating during a prolonged cold snap. These prolonged periods of low renewable production are most likely to occur in winter when solar production is lowest, and at night when storage is most likely to become depleted (Figure 4-8).

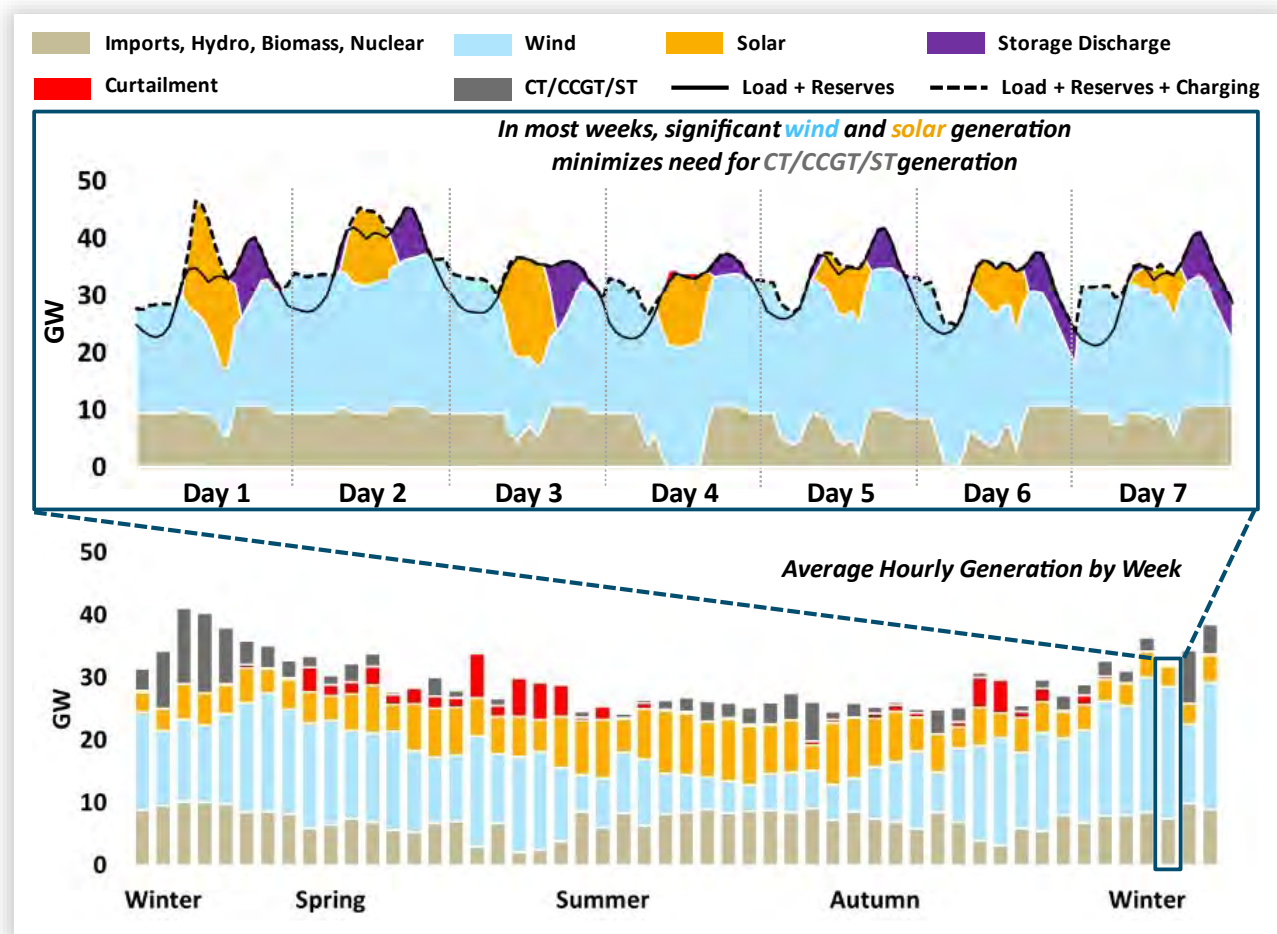
Figure 4-8. Loss-of-Load Probability Distribution by Month-Hour (High Electrification Scenario)



4.3.2 Role of Firm Generation

The portfolios developed in both the High Electrification and High Fuels scenarios contain a significant amount of new renewable capacity. In many weeks of the year when solar and wind are producing at average or above average output, the generation from these resources, in conjunction with the storage on the system, is sufficient to meet all energy needs as shown in Figure 4-9.

Figure 4-9. Illustrative Dispatch over a Typical Week in 2050^u (High Electrification Scenario)



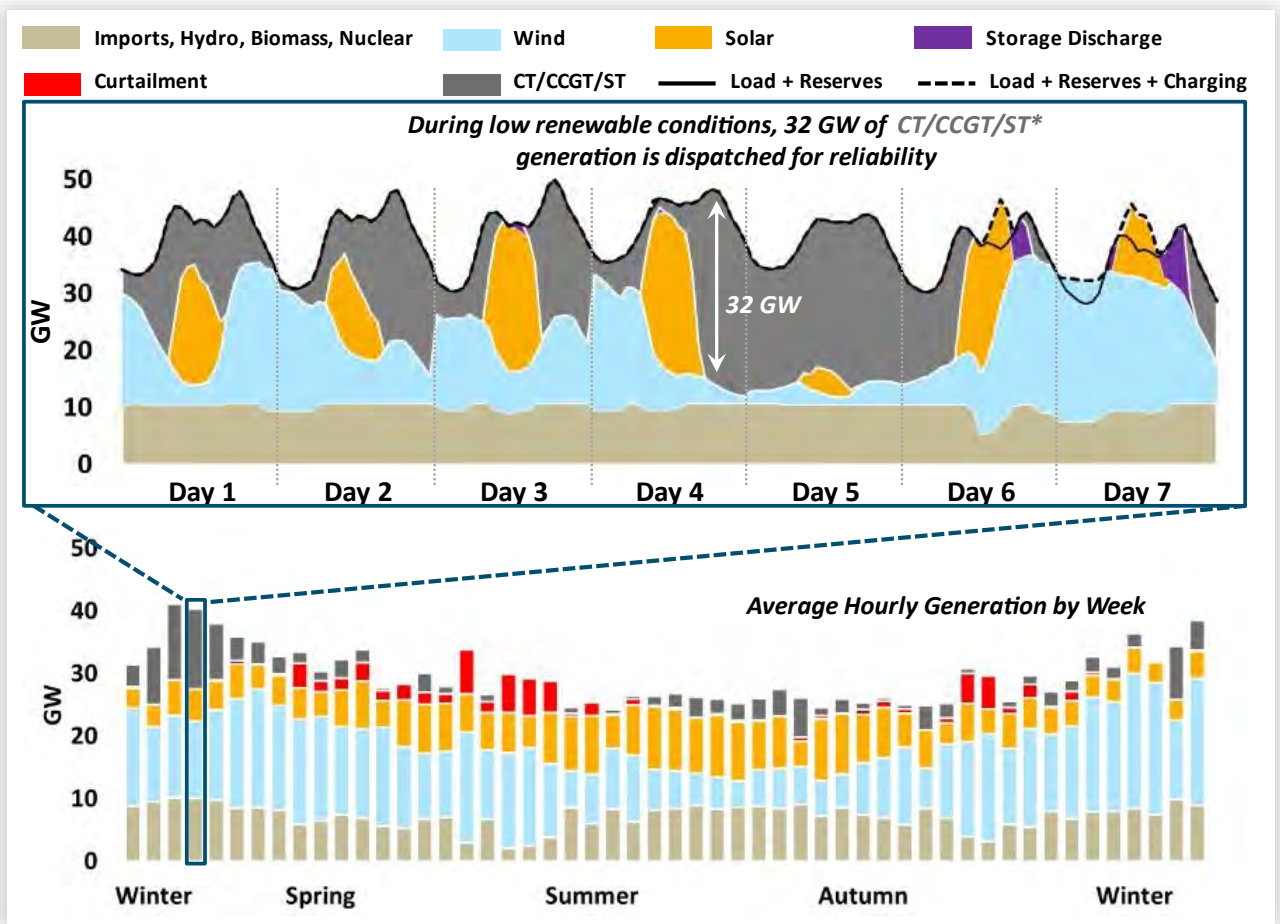
Note: CT/CCGT/ST could represent natural gas with or without CCS, hydrogen or other zero-carbon fuels burned in CT/CCGT, advanced nuclear or long duration storage.

However, during weeks with prolonged low solar and wind generation, it becomes necessary to dispatch firm resources as shown in Figure 4-10. As an example, the combined capacity factor of solar and wind generation is 6% in Day 5 of the sample week, leading to insufficient generation to either serve load or charge energy storage. Approximately one such equivalent day every year was identified in the historical solar and wind availability data sourced from NREL.^v The additional solar, wind and storage that would need to be built to serve load in such instances would be significant and would also lead to significant renewable oversupply during average generation weeks. This outcome is shown in Figure 4-11.

^u The figure reflects one specific realization among several RECAP simulations of the year 2050 under different weather conditions, resource availability and outages.

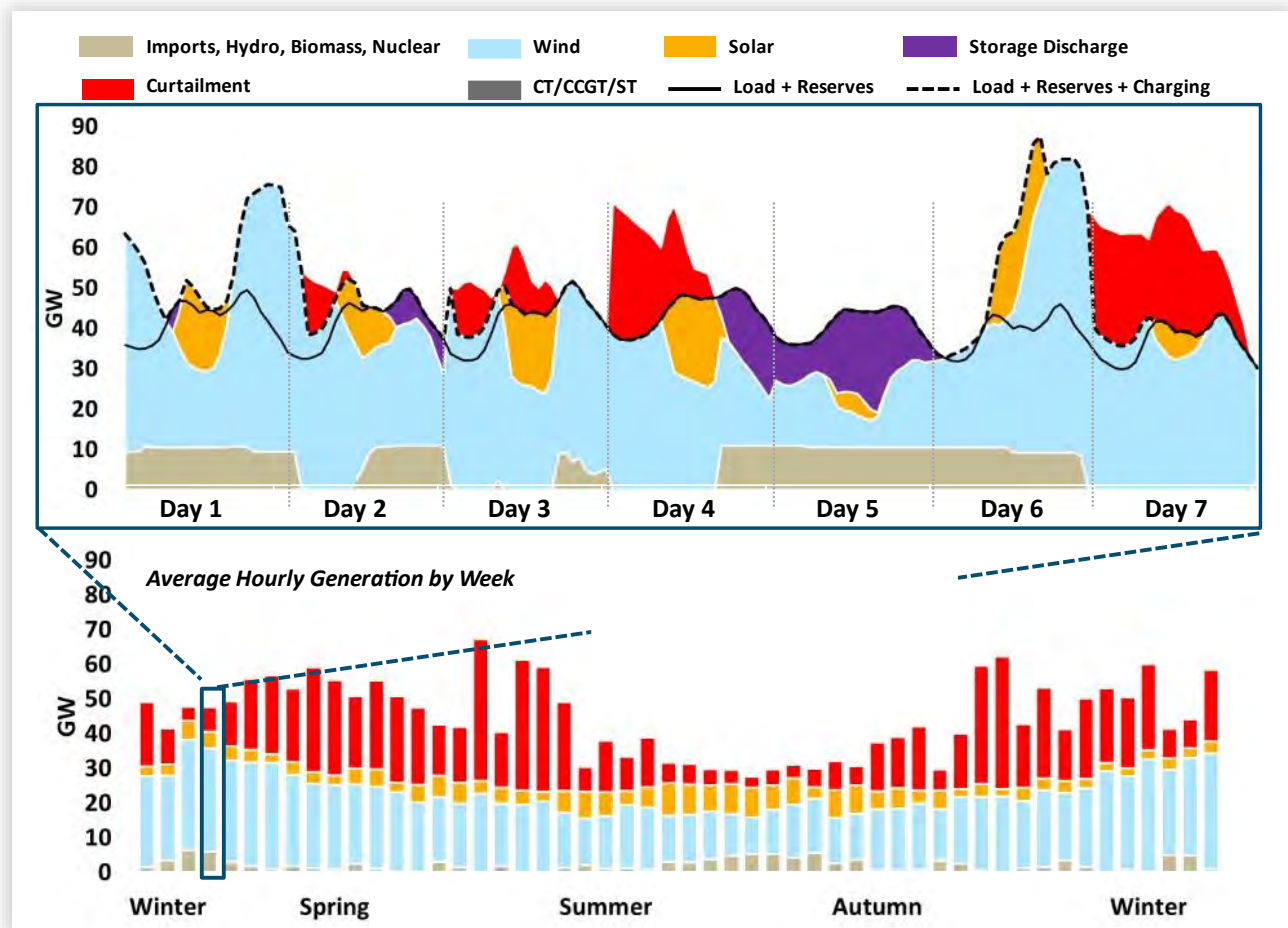
^v Wind speed and solar insolation data were obtained from the NREL Wind Toolkit and the NREL Solar Prospector Database, respectively for 2007-2012. They were then transformed into hourly production profiles using the NREL System Advisor Model. Further details in Section 7.4.

Figure 4-10. Illustrative Dispatch over a Critical Week in 2050 (High Electrification Scenario)



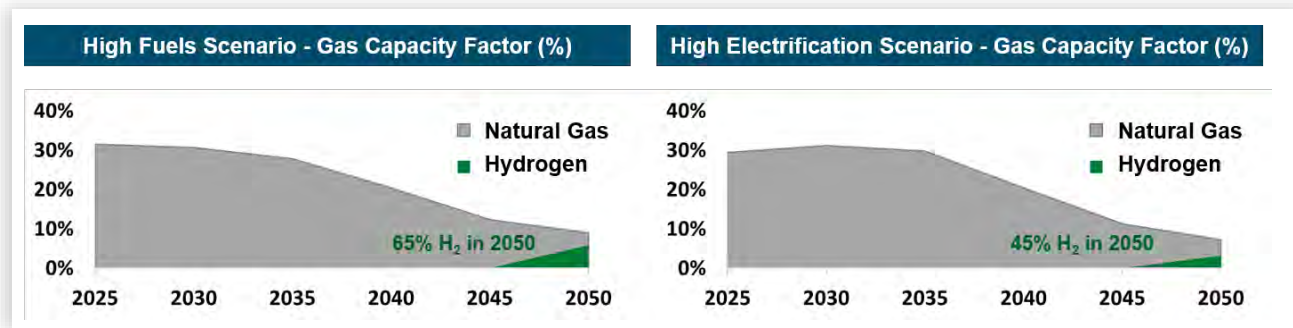
Note: * CT/CCGT/ST could represent natural gas with or without CCS, hydrogen or other zero-carbon fuels burned in CT/CCGT, advanced nuclear or long duration storage.

Figure 4-11. Illustrative Dispatch over a Critical Week in 2050 (No Combustion Resources with High Electrification Scenario)



Generation from natural gas combustion-based resources is relatively infrequent and, if based in part on carbon-free fuels, can still ensure compliance with stringent emission targets. As shown in Figure 4-12, the fleet-wide capacity factor of natural gas units reduces from about 30% in 2025 to 7-9% in 2050, with 45-65% of the fuel burned in 2050 being hydrogen, though this could be replaced with another zero-carbon drop-in fuel such as renewable natural gas. These combustion resources ensure that the system has sufficient firm capacity while meeting the electricity sector carbon target of 1.9-2.5 MMT/yr.

Figure 4-12. Gas Units (CC/CT) Capacity Factor Results



Taken together, a key finding of this study is that both retaining existing and building new natural gas capacity is consistent with deep decarbonization GHG targets as long as it is coupled with significant renewable resource additions, which provide the preponderance of energy generation.

4.3.3 ELCC Results

Effective load carrying capability (ELCC) is the quantity of “perfect capacity” that could be replaced or avoided with a resource while providing equivalent system reliability as described in Section 3.5.2. Figure 4-13 and Figure 4-14 show the ELCC provided by wind (offshore and onshore) and four-hour battery storage while also highlighting the significant diminishing marginal ELCC value at high penetrations of these resources. These diminishing returns for wind are due to saturation of production during high load hours and for battery storage are due to peak clipping that ultimately requires longer durations to continue to generate across all peak hours. These are well recognized phenomena within the industry.^w

^w See: <https://www.ethree.com/wp-content/uploads/2020/08/E3-Practical-Application-of-ELCC.pdf>

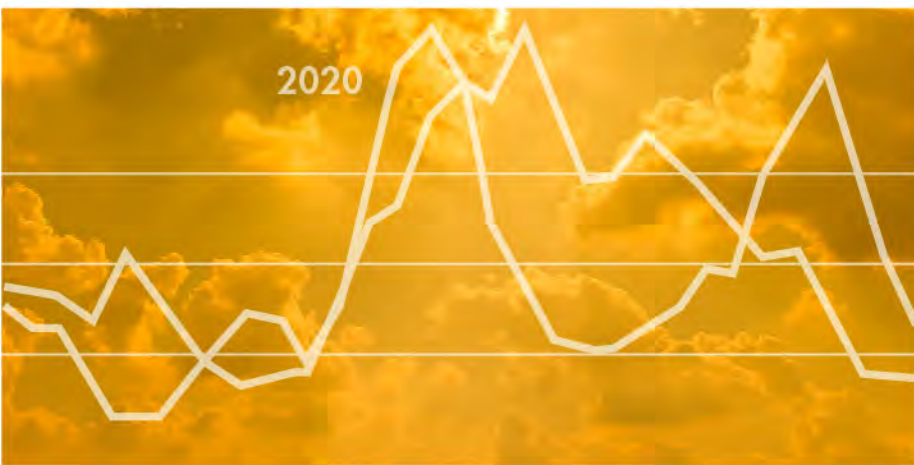
EXHIBIT 5



Preliminary Root Cause Analysis

Mid-August 2020 Heat Storm

October 6, 2020



Prepared by:
California Independent System Operator
California Public Utilities Commission
California Energy Commission

Table of Contents

| | |
|--|-----------|
| Executive Summary | 1 |
| ES.1 Roles of the Entities Delivering This Report..... | 1 |
| ES.2 Summary of Conditions and Events of August 14 and 15, 2020..... | 2 |
| ES.3 Preliminary Understanding of Various Factors That Contributed to Rotating Outages on August 14 and 15, 2020..... | 3 |
| ES.4 Actions Taken to Mitigate Projected Supply Shortfalls During August | 14 |
| ES.5 Preliminary Recommendations | 14 |
| ES.6 Next Steps..... | 15 |
| 1 Introduction | 16 |
| 2 Background | 17 |
| 2.1 Resource Adequacy Process in the CAISO BAA..... | 17 |
| 2.2 CEC’s Role in Forecasting and Allocating Resource Adequacy Obligations 19 | |
| 2.3 CPUC’s Role in Allocating RA Obligations to Jurisdictional LSEs..... | 21 |
| 2.3.1 Timeline for RA Process, Obligations, and Penalties | 22 |
| 2.4 CAISO’s Role in Ensuring RA Capacity is Operational..... | 24 |
| 3 Mid-August Event Overview | 26 |
| 3.1 Weather and Demand Conditions During Mid-August | 26 |
| 3.2 CAISO Reliability Requirements and Communications During mid-August Event | 29 |
| 3.3 Sequence of Events of CAISO Actions | 33 |
| 3.3.1 Prior to August 14..... | 33 |
| 3.3.2 August 14 | 33 |
| 3.3.3 August 15 | 36 |
| 3.3.4 August 16 through 19..... | 38 |
| 3.4 Number of Customers Impacted by Rotating Outages..... | 41 |
| 4 Preliminary Understanding of Various Factors That Contributed to Rotating Outages on August 14 and 15 | 43 |
| 4.1 Existing Resource Planning Processes are Not Designed to Fully Address an Extreme Heat Storm..... | 43 |

| | | |
|----------|--|-----------|
| 4.2 | In Transitioning to a Reliable, Clean, and Affordable Resource Mix, Resource Planning Targets Have Not Kept Pace to Lead to Sufficient Resources That Can Be Relied Upon to Meet Demand in the Early Evening Hours | 45 |
| 4.2.1 | Planning Reserve Margin Was Exceeded on August 14 | 46 |
| 4.2.2 | Critical Grid Needs Extend Beyond the Peak Hour | 47 |
| 4.2.3 | Supply, Market Awards, and Actual Energy Production by Resource Type 49 | |
| 4.2.3.1 | Natural Gas Fleet | 50 |
| 4.2.3.2 | Imports | 51 |
| 4.2.3.3 | Hydro..... | 51 |
| 4.2.3.4 | Solar and Wind | 52 |
| 4.2.3.5 | Demand response..... | 52 |
| 4.2.3.6 | Combined Resources..... | 55 |
| 4.3 | Some Practices in the Day-Ahead Energy Market Exacerbated the Supply Challenges Under Highly Stressed Conditions | 56 |
| 4.3.1 | Demand Should Be Appropriately Scheduled in the Day-Ahead Timeframe | 56 |
| 4.3.2 | Convergence Bidding Masked Tight Supply Conditions | 57 |
| 4.3.3 | Residual Unit Commitment Process Changes Were Needed..... | 57 |
| 5 | Actions Taken During August 16 Through 19 to Mitigate Projected Supply Shortfalls | 59 |
| 5.1 | Detailed Description of Actions Taken | 60 |
| 6 | Preliminary Recommendations | 64 |
| 7 | Next Steps | 70 |
| | Appendix A: CEC Load Forecasts for Summer 2020 | 71 |
| | Appendix B: Technical Discussion on Supply Conditions Based on Current Resource Planning Targets and Energy Market Practices..... | 75 |
| B.2 | Detailed Analysis on Supply Conditions Based on Current Resource Planning Targets..... | 76 |
| B.2.1 | Planning Reserve Margin..... | 77 |
| B.2.2 | Critical Grid Needs Extend Beyond the Peak Hour | 78 |
| B.2.3 | RA Resources Were Challenged to Provide Energy Up to the Full RA Value Shown to the CAISO | 80 |
| B.2.3.1 | Supply-Side RA Shown Capacity, Bids, Awards, and Energy Production | 84 |

| | | |
|---------|---|-----|
| B.2.3.2 | Preliminary Demand Response Analysis for Credits and Shown RA | 94 |
| B.2.3.3 | Combined Resources | 96 |
| B.3 | Energy Market Practices Exacerbated the Supply Challenges Under Highly Stressed Conditions..... | 97 |
| B.3.1 | Demand Should Be Appropriately Scheduled in the Day-Ahead Timeframe 97 | |
| B.3.2 | Convergence Bidding Masked Tight Supply Conditions | 101 |
| B.3.3 | Residual Unit Commitment Process Changes | 104 |
| B.3.4 | Energy Imbalance Market | 107 |

List of Tables

| | |
|---|----|
| Table 2.1: RA 2020 LSE Forecast Timeline..... | 21 |
| Table 3.1: Customers Affected by August 14 Rotating Outages..... | 42 |
| Table 3.2: Customers Affected by August 16 Rotating Outages..... | 42 |
| Table 4.1: August 2020 RA Obligation, Shown RA, RMR, and Credits | 45 |
| Table 5.1: Day-Ahead Peak Forecast vs. Actual Peak During Heat Event..... | 60 |

List of Figures

| | |
|--|----|
| Figure ES.1: August Temperatures 1985 - 2020..... | 5 |
| Figure ES.2: Demand and Net Demand for August 14 and 15 | 7 |
| Figure ES.3: August 14 Net Demand Peak (6:51 pm) – Real-Time Awards and Actual Energy Production vs. August 2020 Shown RA and RMR | 8 |
| Figure ES.4: Credited IOU Demand Response: Preliminary Estimated RDRR Response and PDR Dispatch vs. CPUC August 2020 DR Credit | 10 |
| Figure ES.5: CAISO Dispatch of Non-IOU PDR (Actual Load Drop Not Yet Available)..... | 11 |
| Figure ES.6: August 2020 Shown RA and RMR Allocation vs. August 14 and 15 Actual Energy Production (Assumes All Wind and Solar Count as RA Capacity) | 12 |
| Figure ES.7: Comparison of Actual, CAISO Forecast, and Bid-in Demand | 13 |
| | |
| Figure 3.1: National Weather Service Sacramento Graphic for August 14..... | 26 |
| Figure 3.2: National Weather Service Weather Prediction Center Graphic for August 15 | 27 |
| Figure 3.3: National Weather Service Weather Prediction Center Graphic for August 18 | 28 |
| Figure 3.4: 2017 -2019 Summer Net Imports at Time of Daily Peaks Above 41,000 MW | 29 |
| Figure 3.5: Wind and Solar Generation Profiles for August 14 and 15..... | 38 |
| Figure 3.6: Comparison of Day-Ahead Forecast and Actual Demand for August 17 | 39 |
| Figure 3.7: Comparison of Day-Ahead Forecast and Actual Demand for August 18 | 40 |
| Figure 3.8: Comparison of Day-Ahead Forecast and Actual Demand for August 19 | 40 |
| Figure 4.1: August Temperatures 1985 - 2020..... | 44 |
| Figure 4.2: August 2020 PRM and Actual Operational Need During Peak | 47 |
| Figure 4.3: Demand and Net Demand for August 14 and 15 | 49 |
| Figure 4.4: August 14 Net Demand Peak (6:51 pm) August 2020 Shown RA and RMR, Real-time Awards, and Actual Energy Production..... | 50 |
| Figure 4.5: Credited IOU Demand Response: Preliminary Estimated RDRR Response and PDR Dispatch vs. CPUC August 2020 DR Credit | 54 |
| Figure 4.6: CAISO Dispatch of Non-IOU PDR (Actual Load Drop Not Yet Available) | 54 |
| Figure 4.7: August 2020 Shown RA and RMR Allocation vs. August 14 and 15 Actual Energy Production (Assumes All Wind and Solar Counts as RA Capacity) | 55 |
| Figure 4.8: Comparison of Actual, CAISO Forecast, and Bid-in Demand | 57 |

| | |
|---|-----|
| Figure B.1: August 2020 PRM and Actual Operational Need During Peak | 78 |
| Figure B.2: Demand and Net Demand for August 14 and 15 | 80 |
| Figure B.3: RA Outage Snapshot for August 14 and 15 | 81 |
| Figure B.4: August 14 Peak (4:56 pm) Unused RA Capacity by Resource Type | 83 |
| Figure B.5: August 14 Net Demand Peak (6:51 pm) Unused RA Capacity by Resource Type | 83 |
| Figure B.6: August 15 Peak (5:37 pm) Unused RA Capacity by Resource Type | 84 |
| Figure B.7: August 15 Net Demand Peak (6:26 pm) Unused RA Capacity by Resource Type | 84 |
| Figure B.8: August 14 Peak (4:56 pm) – Day-Ahead Bids vs. August 2020 Shown RA and RMR..... | 86 |
| Figure B.9: August 14 Net Load Peak (6:51 pm) – Day-Ahead Bids vs. August 2020 Shown RA and RMR | 86 |
| Figure B.10: August 15 Peak (5:37 pm) – Day-Ahead Bids vs. August 2020 Shown RA and RMR..... | 87 |
| Figure B.11: August 15 Net Demand Peak (6:26 pm) – Day-Ahead Bids vs. August 2020 Shown RA and RMR..... | 88 |
| Figure B.12: August 14 Peak (4:56 pm) – Day-Ahead Awards vs. August 2020 Shown RA and RMR | 89 |
| Figure B.13: August 14 Net Demand Peak (6:51 pm) – Day-Ahead Awards vs. August 2020 Shown RA and RMR..... | 89 |
| Figure B.14: August 15 Peak (5:37 pm) – Day-Ahead Awards vs. August 2020 Shown RA and RMR | 90 |
| Figure B.15: August 15 Net Demand Peak (6:26 pm) – Day-Ahead Awards vs. August 2020 Shown RA and RMR..... | 90 |
| Figure B.16: August 14 Peak (4:56 pm) – Real-Time Awards and Actual Energy Production vs. August 2020 Shown RA and RMR | 92 |
| Figure B.17: August 14 Net Demand Peak (6:51 pm) – Real-Time Awards and Actual Energy Production vs. August 2020 Shown RA and RMR | 92 |
| Figure B.18: August 15 Peak (5:37 pm) – Real-Time Awards and Actual Energy Production vs. August 2020 Shown RA and RMR | 93 |
| Figure B.19: August 15 Net Demand Peak (6:26 pm) – Real-Time Awards and Actual Energy Production vs. August 2020 Shown RA and RMR | 93 |
| Figure B.20: Credited IOU Demand Response: Preliminary Estimated RDRR Response and PDR Dispatch vs. CPUC August 2020 DR Credit | 95 |
| Figure B.21: CAISO Dispatch of Non-IOU PDR (Actual Load Drop Not Yet Available) | 95 |
| Figure B.22: August 2020 Shown RA and RMR Capacity vs. August 14 and 15 Actual Energy Production (Assumes all Wind and Solar Counts as RA Supply) | 96 |
| Figure B.23: Comparison of Actual, CAISO Forecasted, and Bid-in Demand | 98 |
| Figure B.24: Comparison of Non-RA Cleared Supply vs. Total Exports | 100 |
| Figure B.25: Total Exports by Category | 100 |

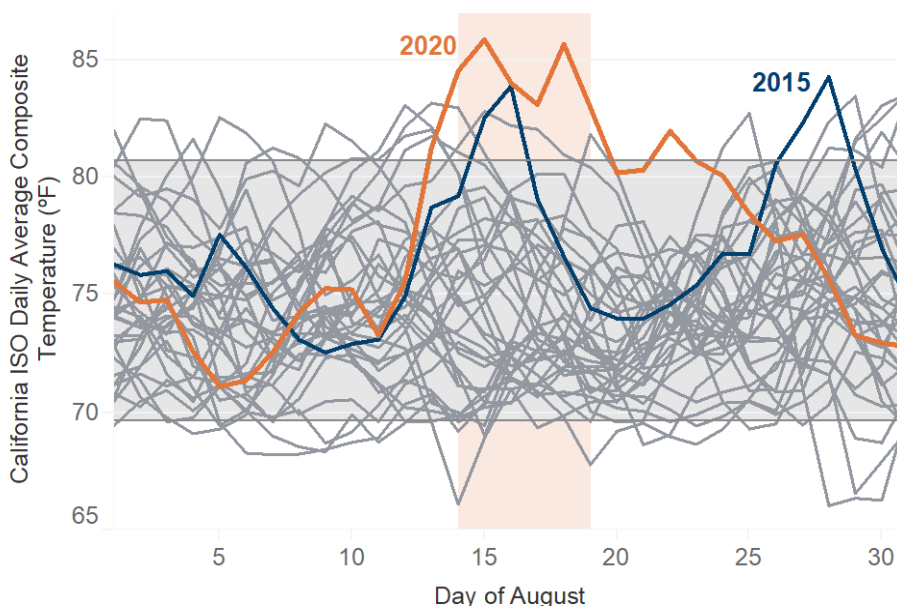
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| Figure B.26: Illustrative Example of Impact of Under-Scheduled Load Under Supply Scarcity | 102 |
| Figure B.27: Illustrative Example of Impact of Under-Scheduled Load Under Supply Sufficiency | 103 |
| Figure B.28: Illustrative Example of Impact of Convergence Bidding..... | 104 |
| Figure B.29: CAISO EIM Real-Time Transfers as Compared to Flexible Ramping Sufficiency Cap..... | 108 |

GLOSSARY OF ACRONYMS

| ACRONYM | DEFINITION |
|---------|--|
| AAEE | Additional Achievable Energy Efficiency |
| AB | Assembly Bill |
| A/S | Ancillary Services |
| AWE | Alerts, Warnings, and Emergencies |
| BA | Balancing Authority |
| BAA | Balancing Authority Area |
| BPM | Business Practice Manual |
| CAISO | California Independent System Operator Corporation |
| CARB | California Air Resources Board |
| CCA | Community Choice Aggregator |
| CDWR | California Department of Water and Power |
| CEC | California Energy Commission |
| CHP | Combined Heat and Power |
| COI | California Oregon Intertie |
| CPM | Capacity Procurement Mechanism |
| CPUC | California Public Utilities Commission |
| DMM | CAISO Department of Market Monitoring |
| EIM | Energy Imbalance Market |
| ELCC | Effective Load Carrying Capability |
| ESP | Electric Service Provider |
| FERC | Federal Energy Regulatory Commission |
| GHG | Greenhouse Gas |
| IERP | Integrated Energy Policy Report |
| IFM | Integrated Forward Market |
| IOU | Investor Owned Utility |
| IRP | Integrated Resource Planning |
| JASC | Joint Agency Steering Committee |
| LADWP | Los Angeles Department of Water and Power |
| LMS | Load Management Standards |
| LOLE | Loss of Load Expectation |
| LRA | Local Regulatory Authority |
| LSE | Load Serving Entity |
| MW | Megawatt |
| MWD | Metropolitan Water District |
| NCPA | Northern California Power Agency |
| NERC | North American Electric Reliability Corporation |
| NOB | Nevada Oregon Border |

| ACRONYM | DEFINITION |
|----------------|--|
| NQC | Net Qualifying Capacity |
| NWS | National Weather Service |
| PDCI | Pacific DC Intertie |
| PDR | Proxy Demand Resource |
| PGE | Portland General Electric |
| PG&E | Pacific Gas & Electric |
| PIME | Price Inconsistency Market Enhancements |
| POU | Publicly Owned Utility |
| PRM | Planning Reserve Margin |
| QC | Qualifying Capacity |
| RA | Resource Adequacy |
| RAAIM | Resource Adequacy Availability Incentive Mechanism |
| RDRR | Reliability Demand Response Resource |
| RMO | Restricted Maintenance Operations |
| RMR | Reliability Must Run |
| RUC | Residual Unit Commitment |
| SB | Senate Bill |
| SCE | Southern California Edison |
| SDGE | San Diego Gas & Electric |
| SMUD | Sacramento Municipal Utility District |
| TAC | Transmission Access Charge |
| TOU | Time of Use |
| WAPA | Western Area Power Administration |
| WECC | Western Electric Coordinating Council |

Figure ES.1: August Temperatures 1985 - 2020



(Source: CEC Weather Data/CEC Analysis)

Based on CEC analysis, the heat storm experienced in August was a 1-in-35 year weather event.¹ Moreover, the rapidly evolving demand patterns induced by COVID-19 were not anticipated in the planning and resource procurement timeframe, which is necessarily an iterative, multi-year process. The energy markets can help fill the gap between planning and real-time conditions, but the West-wide nature of this heat storm limited the energy markets' ability to do so.

In Transitioning to a Reliable, Clean, and Affordable Resource Mix, Resource Planning Targets Have Not Kept Pace to Lead to Sufficient Resources That Can Be Relied Upon to Meet Demand in the Early Evening Hours, Which Were Amplified by the Extreme Heat

For August 2020, all LSEs met their resource adequacy (RA) obligations either with physical resources or demand response shown to the CAISO, allocations from resources backstopped under a Reliability Must Run (RMR) agreement, or through credits that are applied by the local regulatory authority (LRA) on behalf of a LSE. Collectively, the obligations include a 15% PRM added to the peak of the August forecasted 1-in-2 demand. However, on August 14, the operational need was 1.3 to 2.5% higher than the PRM driven by higher load and therefore higher contingency reserve requirements and reduced resource and transmission availability. On August 15 the operational need

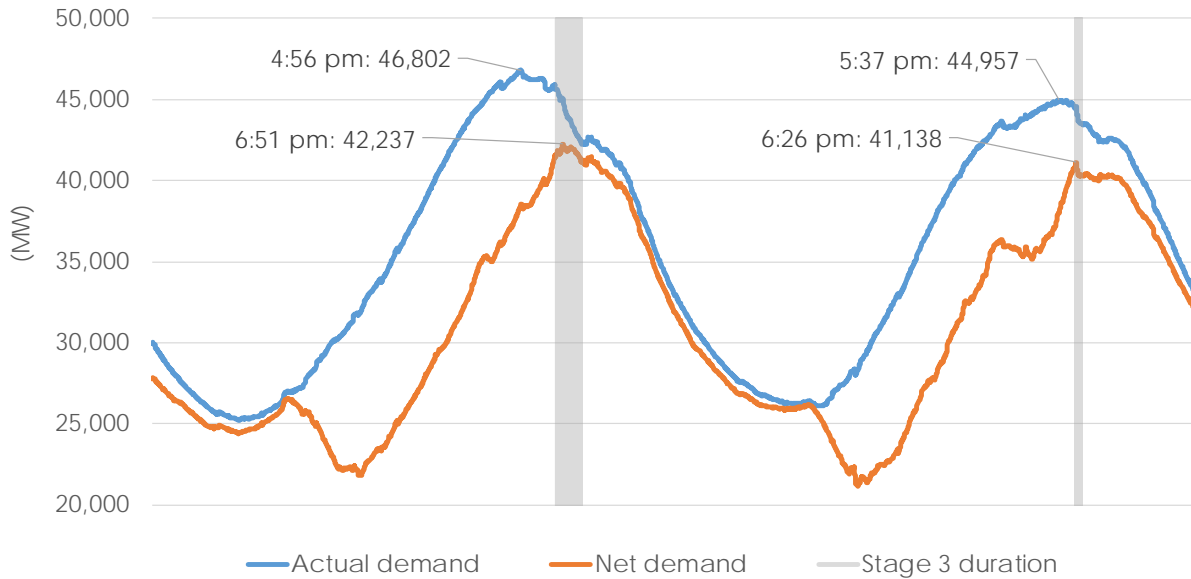
¹ Currently the RA obligation is planned for a 1-in-2 weather and adds a 15% PRM, in part to act as buffer for deviations from the 1-in-2 weather event.

was 0.7 to 1.7% lower than the PRM. While a PRM comparison is informative, the rotating outages both occurred after the peak hour, as explained below.

The construct for RA was developed around peak demand, which until recently has been the most challenging and highest cost moment to meet demand. The principle was that if enough capacity was available at peak demand there would be enough capacity at all other hours of the day as well since most resources could run 24/7 if needed. With the increase of solar penetration in recent years, however, this is no longer the case. The single critical period of peak demand is giving way to multiple critical periods during the day. A second critical period is the net demand peak, which is the peak of load net of solar and wind generation resources and occurs later in the day than the peak. While RA processes should meet load at all times throughout the day, the net demand peak is becoming the most challenging time period in which to meet demand. Over time, critical grid needs may manifest in other hours, seasons or conditions as the energy resource portfolio continues to evolve.

August 14 illustrates the challenges of with the net demand peak. Figure ES.2 shows the demand peak and net demand peak for August 14 and 15. On August 14, the net demand peak of 42,237 MW at 6:51 pm was 4,565 MW lower than the peak demand at 4:56 pm but wind and solar generation have decreased by 5,431 MW during the same time period. The net demand peak shown is already reduced by the impact of emergency demand response triggered by this time, as discussed further later. The difference between the demand curve (in blue) and the net demand curve (in orange) is largest in the middle of the day (approximately 10 am until 4 pm) when renewables are generating at the highest levels and serving significant CAISO load. Most important, the rotating outages coincide closely with the net demand peaks.

Figure ES.2: Demand and Net Demand for August 14 and 15



On August 14 the Stage 3 Emergency was declared at 6:38 pm, right before the net demand peak at 6:51 pm. Similarly, on August 15 the Stage 3 Emergency was called at 6:28 pm, just after the net demand peak at 6:26 pm.

Supply Side Resources Were Differently Impacted

In addition to the fact that California and the West were facing an extreme heat storm that pushed forecasted demand up to and beyond the limits that California’s RA programs anticipate, many resources that were required to provide energy to the CAISO Balancing Authority Area (BAA) did not, or were not able to, deliver that energy during the hours of peak and net demand peak.

Figure ES.3 shows how selected resources performed during the net demand peak on August 14 across three different time periods. It shows: (1) the levels of shown RA and RMR for August 2020 (blue markers); (2) the real-time awards for energy and ancillary services from shown RA capacity and for amounts above the shown RA (solid yellow and yellow cross-hatched bars) net of planned and forced outages (black bars); and (3) the actual energy delivered (green circles). For real-time awards and actual energy, the amounts are divided between shown RA and RMR capacity and for the amounts above the shown RA. As a simplifying assumption, all wind and solar generation is assumed to count towards RA capacity. Each resource is discussed below.

EXHIBIT 6



Pathways Study

Evaluation of Pathways to a Future Grid

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April 2022



Preface

ISO New England is pleased to present the *Pathways Study, Evaluation of Pathways to a Future Grid* by The Analysis Group, which provides important information to the region on potential pathways to meet the New England states' decarbonization goals. In early 2021, the ISO's Board of Directors directed the ISO management team to pursue an assessment of policy and market frameworks that could further advance the evolution of the regional power grid. The ISO retained the Analysis Group to conduct the study, which is part of New England's Future Grid Initiative to assist the region's transition to a future grid that is efficient, clean and reliable. The Analysis Group worked closely with ISO staff, regional stakeholders, and the New England states to gather input on the development of the assumptions, scenarios, and sensitivities, but it exercised its independent judgement in carrying out the modeling work and the production of study results.

This study is part of ISO New England's broader efforts to assist the region in evaluating the potential needs of a future grid that meets the states' climate and energy goals. The process leading to the final report of this study included numerous meetings with the New England states and the New England Power Pool (NEPOOL) participants to identify the potential approaches, including design concepts; to develop assumptions, scenarios and sensitivities; and to discuss the quantitative and qualitative analysis approach and findings. The ISO and the Analysis Group sought and received valuable feedback during the study process and on a draft version of this report.

The *Pathways Study* provides the region with significant data and analysis to evaluate four approaches that could meet the New England states' ambitious environmental goals. The objective of the study was not to determine a preferred approach, but rather to examine key differences and tradeoffs between the pathways. The findings indicate that all of the approaches considered can achieve substantial greenhouse gas emissions reductions; however, each approach has different implications for economic and market outcomes. Each approach also differs in the degree of coordination needed among the six New England states, as well as in the level of complexity in implementation. In addition, as detailed in the *Pathways Study*, certain approaches have greater implications for the sustainability of competitive wholesale electricity markets.

ISO New England appreciates the work of the Analysis Group and all of those who participated in the process. With this critical information in hand, the region can now seek to find consensus on a path forward and begin to discuss important related issues, such as legal and jurisdictional issues and market design requirements.

A lot of work remains, but the ISO looks forward to the continued collaboration with the states and regional stakeholders to find the most efficient way to meet New England's needs for a clean and reliable future grid.

Table of Contents

| | |
|---|-------------|
| I. Executive Summary | ES-1 |
| II. Introduction | 1 |
| A. Assignment and Study Objectives | 2 |
| B. Study Process | 4 |
| C. Approach to Assessment of Alternative Policy Approaches to Achieving Decarbonization | 4 |
| D. Overview of State Policies Directly or Indirectly Decarbonizing New England’s Electric Power Sector..... | 6 |
| III. Alternative Policy Approaches to Achieving Decarbonization | 13 |
| A. Status Quo | 13 |
| B. Forward Clean Energy Market..... | 15 |
| C. Net Carbon Pricing..... | 20 |
| D. Hybrid Approach | 21 |
| IV. Approach to Quantitative Analysis of Alternative Policy Approaches for Achieving Decarbonization | 22 |
| A. Modeling Framework | 24 |
| B. Central Case Assumptions | 26 |
| 1. <i>Time Period, Market Geography and Emission Target Assumptions</i> | 26 |
| 2. <i>Demand Assumptions</i> | 27 |
| 3. <i>Supply Assumptions</i> | 29 |
| 4. <i>Policy Approach Assumptions</i> | 34 |
| C. Scenario Assumptions | 38 |
| V. Results of Quantitative Analysis: Decarbonization of the New England Electric Power Sector | 42 |
| A. Resource Mix | 42 |
| B. Energy Market Outcomes | 48 |

| | | |
|------------|---|------------|
| 1. | <i>Implications for Prices: Increasing Variable Renewable Output Lowers Average LMPs and Increases LMP Spreads.....</i> | <i>49</i> |
| 2. | <i>Implications for Gas-Fired Resources.....</i> | <i>52</i> |
| 3. | <i>Implications for Variable Renewable and Storage Operations</i> | <i>53</i> |
| VI. | Assessment of Alternative Policy Approaches to Achieving Increased Decarbonization | 60 |
| A. | Achieving Emission Reduction Targets | 60 |
| 1. | <i>Accommodating Various Degrees of Regional Coordination and Consensus.....</i> | <i>60</i> |
| 2. | <i>Uncertainty in Emission (and Cost) Outcomes</i> | <i>61</i> |
| B. | Incentives for Clean Energy and GHG Emission Reductions..... | 63 |
| 1. | <i>Comparison of the Cost-Effectiveness of Incentives for Decarbonization Created by Alternative Policy Approaches</i> | <i>63</i> |
| 2. | <i>Implications of Structure of Incentives Under Alternative Policy Approaches for Resource Investment and Operation</i> | <i>70</i> |
| C. | Discrimination in Pricing Between Resources | 88 |
| D. | Economic Welfare: Social Costs..... | 92 |
| 1. | <i>Cost-effectiveness of Alternative Policy Approaches.....</i> | <i>92</i> |
| 2. | <i>Quantitative Analysis of Social Costs.....</i> | <i>94</i> |
| E. | Economic Impacts..... | 99 |
| 1. | <i>Prices.....</i> | <i>99</i> |
| 2. | <i>Total Payments.....</i> | <i>104</i> |
| 3. | <i>Distribution of Total Payments</i> | <i>109</i> |
| F. | Other Environmental, Economic and Market Consequences..... | 112 |
| 1. | <i>Consequences for ISO-NE Markets.....</i> | <i>112</i> |
| 2. | <i>Economic Consequences of Multi-year Contracts: Tradeoffs Between Impacts to Project Financing Costs and Utility and Customer Financial Risk.....</i> | <i>113</i> |
| 3. | <i>Challenges for Policy Implementation.....</i> | <i>116</i> |
| 4. | <i>Incentives for Efficient Energy Use</i> | <i>119</i> |

| | |
|--|------------|
| VII. Scenarios | 120 |
| A. Resource Investment and Operation | 120 |
| B. Economic Welfare: Social Costs..... | 125 |
| C. Total Customer Payments | 127 |

Table of Figures

Figure ES-1. Resource Mix, Status Quo Policy Approach, 2020-2040 (MW)ES-11

Figure ES-2. Average Incremental Social Costs by Policy Approach (Relative to the Reference Case), 2021-2040 (\$2020/MWh)ES-12

Figure ES-3. Average Incremental Customer Payments by Policy Approach (Relative to the Reference Case), 2021-2040 (\$2020/MWh)ES-14

Figure ES-4. Annual LMP by Pathway, 2021-2040 (\$2020/MWh)ES-16

Figure ES-5. Carbon and CEC Prices, 2021-2040 (\$2020/MTCO_{2e} and \$2020/MWh).....ES-17

Figure ES-6. LMP and Average Impact of Carbon Price on LMP, 2021-2040 (\$2020/MWh)ES-18

Figure II-1. New England States' Renewable Portfolio Standard Targets, 2020-20409

Figure II-2. New England States' Renewable Energy Procurements and Legislated Targets 10

Figure IV-1. Overview of Modeling Components and Process.....25

Figure IV-2. Historical and Assumed Electricity Sector Emissions (Maximum Allowable) for the New England Region.....27

Figure IV-3. Modeled Monthly Total Energy and Monthly Peak Load, 2020-2040 (TWh and GW)28

Figure IV-4. Overnight Capital Costs by Technology Type (\$2020/kW)32

Figure IV-5. Offshore Wind Capital Costs in 2020 (\$2020)33

Figure IV-6. Alternative Decarbonization Target38

Figure IV-7. Alternative Capital Costs Based on NREL ATB (\$2020/kW).....40

Figure IV-8. Modeled Transmission Network for Transmission Scenario41

Figure V-1. Resource Mix, Status Quo Policy Approach, 2020-2040 (MW)43

Figure V-2. Capacity Additions, Status Quo Policy Approach, 2021-2040 (MW).....43

Figure V-3. Capacity Retirements, Status Quo Policy Approach, 2021-2040 (MW)46

Figure V-4. Generation Mix, Status Quo Policy Approach, 2021-2040 (MWh)48

Figure V-5. Distribution of LMPs by Year, Status Quo Policy Approach, 2022-2040 (\$2020/MWh).....52

Figure V-6. Capacity Factors for Combined Cycle, Battery Storage, Offshore Wind, Onshore Wind, and Solar PV, Status Quo Policy Approach, 2021-2040 (%)53

Figure V-7. Illustration of Excess Generation from Variable Renewable Resources54

Figure V-8. Annual Curtailments by Technology Type for Variable Renewable Generation, Status Quo Policy Approach, 2021-2040 (%).....55

Figure V-9. Illustration of the Role of Battery Storage in Mitigating Curtailments57

Figure VI-1. Resource Mix by Policy Approach, 2040 (MW)71

Figure VI-2. New Resources (Incremental to Baseline State Policies) by Policy Approach, 2040 (MW)71

Figure VI-3. LMP Distribution by Policy Approach, 2040 (\$2020/MWh)73

Figure VI-4. LMP Distribution by Policy Approach, 2022-2040 (\$2020/MWh)73

Figure VI-5. LMP Distribution by Policy Approach, 2021-2040 (Share of All Hours, \$2020/MWh).....74

Figure VI-6. Economic Curtailments of Variable Renewable Generation by Policy Approach, 2021-2040 (TWh)76

Figure VI-7. Economic Curtailments of Variable Renewable Generation by Policy Approach and Technology Type, 2040 (TWh)77

Figure VI-8. Storage Resource Charging and Discharging by Policy Approach, 2040 (MWh)77

Figure VI-9. Illustrative Example of Storage Resource Churning During Negative-Priced Hours.....79

Figure VI-10. Illustration of Long-Duration Spell of Overgeneration Leading to Negative Prices82

Figure VI-11. Distribution of Hours with Negative-LMPs by Duration of Negative-LMP Spell (Number of Hours)83

Figure VI-12. Average Fossil-Fired Emissions Rates by Policy Approach, 2021-204088

Figure VI-13. Comparison of Energy Revenues for Clean Energy Resources by Policy Approach, 2021-2040 (\$2020/MWh)90

Figure VI-14. Annual Social Costs by Policy Approach, 2021-2040 (\$2020 Million).....95

Figure VI-15. Average Social Costs by Policy Approach, 2021-2040 (\$2020/MWh)95

Figure VI-16. Annual Incremental Social Costs by Policy Approach (Relative to the Reference Case), 2021-2040 (\$2020 Million)96

Figure VI-17. Average Incremental Social Costs by Policy Approach (Relative to the Reference Case), 2021-2040 (\$2020/MWh)97

Figure VI-18. Annual Average LMP by Policy Approach, 2021-2040 (\$2020/MWh).....100

Figure VI-19. Annual Carbon and CEC Prices, 2021-2040 (\$2020/MTCO_{2e} and \$2020/MWh).....101

Figure VI-20. Net Carbon Price, 2021-2040 (\$2020/MWh)101

Figure VI-21. Total Impact of Carbon Pricing on Net Energy Market Revenues by Technology Type (\$2020 Billion)102

Figure VI-22. Share of Total Impact of Carbon Pricing on Net Energy Market Revenues by Technology Type103

Figure VI-23. Annual Forward Capacity Market Prices by Policy Approach, 2021-2040 (\$2020/kW-month) 104

Figure VI-24. Annual Customer Payments by Policy Approach, 2021-2040 (\$2020 Million)105

Figure VI-25. Average Customer Payments by Policy Approach, 2021-2040 (\$2020/MWh)106

Figure VI-26. Annual Incremental Customer Payments by Policy Approach (Relative to the Reference Case), 2021-2040 (\$2020 Million)107

Figure VI-27. Average Incremental Customer Payments by Policy Approach (Relative to the Reference Case), 2021-2040 (\$2020/MWh).....107

Figure VI-28. Customer Payments by Category, 2031-2040 (\$2020 Million).....108

Figure VI-29. Allocation of Total Payments by State and Policy Approach, 2031-2040 (\$2020 Million).....110

Figure VI-30. Average Payments by State and Policy Approach, 2040 (\$2020/MWh)110

Figure VI-31. Change in Total Payments from Alternative Payment Allocation (Proportional to Load) for Each State by Policy Approach, 2031-2040 (\$2020 Million)111

Figure VI-32. Change in Total Payments from Alternative Payment Allocation (Proportional to Load) for Each State by Policy Approach, 2040 (\$2020/MWh).....112

Figure VII-1. Difference in Resource Mix by Policy Approach for Alternative Regional Decarbonization Target Scenario Compared to Central Case, 2040 (MW)121

Figure VII-2. Difference in Resource Mix by Policy Approach for Alternative Capital Cost Scenario Compared to Central Case, 2040 (MW)122

Figure VII-3. Difference in Resource Mix by Policy Approach for Additional Retirements Scenario Compared to Central Case, 2040 (MW)123

Figure VII-4. Difference in Resource Mix by Policy Approach for Transmission Scenario Compared to Central Case, 2040 (MW)124

Figure VII-5. Difference in Resource Mix for Alternative Hybrid Approach LMP Scenario Compared to Central Case Hybrid Approach, 2040 (MW)125

Table of Tables

Table ES-1. Summary of Key Factors Differentiating Decarbonization Pathways Policy Approaches.....ES-3

Table ES-2. Incremental Social Costs by Policy Approach, 2040 and Present Value (Relative to the Reference Case)ES-13

Table ES-3. Incremental Customer Payments by Policy Approach, 2040 and Present Value, 2021-2040 (Relative to the Reference Case)ES-15

Table ES-4. Summary of Central Case and Scenario Estimated Social Costs PaymentsES-15

Table II-1. New England States’ Legislated Economywide GHG Emission Reductions Targets.....6

Table IV-1. Assumed ISO-NE Resource Mix by Technology Type as of December 31, 2020 (MW)30

Table IV-2. Status Quo Resource Mix Incremental Build by State (GW)35

Table IV-3. New England States’ Decarbonization Commitments by 204035

Table IV-4. Technologies Eligible for CECs in the FCEM and Hybrid Approach or Subject to the Carbon Tax in the Net Carbon Price and Hybrid Approach37

Table IV-5. Comparison of Overnight Capital Cost Assumptions, Central Cases (EIA) vs. Alternative Capital Costs Scenario (NREL)39

Table V-1. Change in Resource Mix from 2020 to 2040, Status Quo Policy Approach (MW)44

Table VI-1. Cost-Effectiveness of Incentives for Emission Reductions Under Alternative Policy Approaches64

Table VI-2. Summary Statistics for Energy Market LMPs by Policy Approach, 204074

Table VI-3. Average Battery Cycling by Policy Approach, 204081

Table VI-4. Marginal Abatement Costs, Alternative Forms of Fossil Fuel Switching87

Table VI-5. Incremental Social Costs by Policy Approach, 2040 and Present Value (Relative to the Reference Case)97

Table VI-6. Incremental Customer Payments by Policy Approach, 2040 and Present Value, 2021-2040 (Relative to the Reference Case)108

Table VII-1. Present Value of Incremental Social Costs by Policy Approach and Scenario (Relative to the Reference Case), 2021-2040 (\$2020 Million).....126

Table VII-2. Incremental Social Costs by Policy Approach and Scenario (Relative to the Reference Case), 2040 (\$2020 Million)126

Table VII-3. Average Incremental Social Costs by Policy Approach and Scenario (Relative to the Reference Case), 2040 (\$2020/MWh)126

Table VII-4. Incremental Social Costs by Policy Approach (Relative to the Reference Case), Central Case and Hybrid Approach Alternative LMP Scenario127

Table VII-5. Present Value of Incremental Customer Payments by Policy Approach and Scenario (Relative to the Reference Case), 2021-2040 (\$2020 Million)128

Table VII-6. Incremental Customer Payments by Policy Approach and Scenario (Relative to the Reference Case), 2040 (\$2020 Million).....128

Table VII-7. Average Incremental Customer Payments by Policy Approach and Scenario (Relative to the Reference Case), 2040 (\$2020/MWh).....128

Table VII-8. Incremental Customer Payments by Policy Approach (Relative to the Reference Case), Central Case and Hybrid Approach Alternative LMP Scenario.....130

Glossary of Terms

| Abbreviation | Definition |
|---------------------|--|
| AEO | Annual Energy Outlook |
| ATB | Annual Technology Baseline |
| ATWACC | After-Tax Weighted Average Cost of Capital |
| BOEM | Bureau of Ocean Energy Management |
| BTM | Behind-the-meter |
| BTM PV | Behind-the-meter Photovoltaic |
| CEC | Clean Energy Certificate |
| CELT | Capacity, Energy, Loads, and Transmission Report |
| CEM | Capacity Expansion Model |
| CO ₂ | Carbon Dioxide |
| CO ₂ e | Carbon Dioxide Equivalent |
| EAS | Energy and Ancillary Services |
| EIA | Energy Information Administration |
| EMS | Energy Market Simulation |
| FCA | Forward Capacity Auction |
| FCEM | Forward Clean Energy Market |
| FCM | Forward Capacity Market |
| FERC | Federal Energy Regulatory Commission |
| FGRS | Future Grid Reliability Study |
| GHG | Greenhouse Gases |
| ICCM | Integrated Clean Capacity Market |
| ICR | Installed Capacity Requirement |
| LMP | Locational Marginal Price |
| MT | Metric Ton |
| MTCO ₂ e | Metric Ton Carbon Equivalent |
| NA | Not Applicable |
| NCP | Net Carbon Pricing |
| NECEC | New England Clean Energy Connect |
| NEPOOL | New England Power Pool |
| NESCOE | New England States Committee on Electricity |
| NREL | National Renewable Energy Laboratory |
| O&M | Operations and Maintenance |
| PPA | Power Purchase Agreement |

| Abbreviation | Definition |
|---------------------|--------------------------------------|
| PV | Photovoltaic |
| REC | Renewable Energy Certificate |
| RGGI | Regional Greenhouse Gas Initiative |
| RPS | Renewable Portfolio Standard(s) |
| SMART | Solar Massachusetts Renewable Target |
| SRMC | Short-Run Marginal Cost |

V. Results of Quantitative Analysis: Decarbonization of the New England Electric Power Sector

The focus of the Pathways Study is on tradeoffs between alternative policy approaches to achieving decarbonization of the New England electric power system. However, before evaluating these tradeoffs, we first provide an overview of the quantitative modeling results with the goal of giving the reader background and intuition for key market and system changes arising from the transition to a more decarbonized grid. This background is valuable in its own right, given the challenges the region will face to making this transition, but also important background for the comparison of policy approaches we undertake in **Section VI**.

This section presents a description of several key mechanisms by which the power system evolves to drive emissions down to the target of 80% below 1990 emissions by 2040. The discussion focuses on results from the Status Quo approach, in part because this is the pathway the region is currently moving along, in which states achieve this decarbonization target via bilateral power purchase agreements rather than a centralized market mechanism. However, the issues and concepts discussed in this section are common across policy approaches, and thus we could have reviewed any approach to illustrate these issues. If readers are interested in the corresponding figures for other policy approaches, these are provided in **Appendix B**.

A. Resource Mix

Decarbonization of the New England electric power system is accomplished largely through changing the mix of physical assets in the system. **Figure V-1** shows the annual resource mix over the study period under the Status Quo approach. The changes in resource mix over the study period reflect the entry of new capacity, as well as the retirement of older fossil-fired resources, although the quantity of retirements is small in comparison to new entry. **Figure V-2** shows the incremental entry of new capacity by year over the study period, while incremental retirements are shown below, in **Figure V-3**.

The specific change in the resource mix shown in **Figure V-1** reflects many factors, including increasing loads (due to heating and transportation electrification), baseline state policies, and achievement of the 2040 emission target. To better understand the incremental changes in the resource mix needed to achieve decarbonization in New England, **Table V-1** shows the change in the resource mix from 2020 to 2040 under the Status Quo:

- **Clean Energy Resources.** The largest system change is the significant expansion of clean energy resources to achieve decarbonization. Clean energy resource capacity increases by 35.3 GW across many technologies, including solar (BTM and utility scale PV), wind (offshore and onshore), and hydroelectric (NECEC).
- **Storage Resources.** To complement the variable output of solar and wind resources, 12.9 GW of battery storage is developed.
- **Fossil Resources.** While clean energy and storage resources increase, on net fossil resource capacity declines by 2.1 GW, reflecting an increase of 3.1 GW of combustion turbine capacity, 1.4 GW of efficient combined cycle capacity, and the retirements of 6.6 GW of existing combined cycle, existing combustion turbines, coal, and steam capacity. Thus, fossil resources are retired on net to meet the

increasingly stringent carbon target, but the mix of resources shifts toward lower capital cost-higher operating cost combustion turbines that can more cost-effectively supply resource adequacy.

Figure V-1. Resource Mix, Status Quo Policy Approach, 2020-2040 (MW)

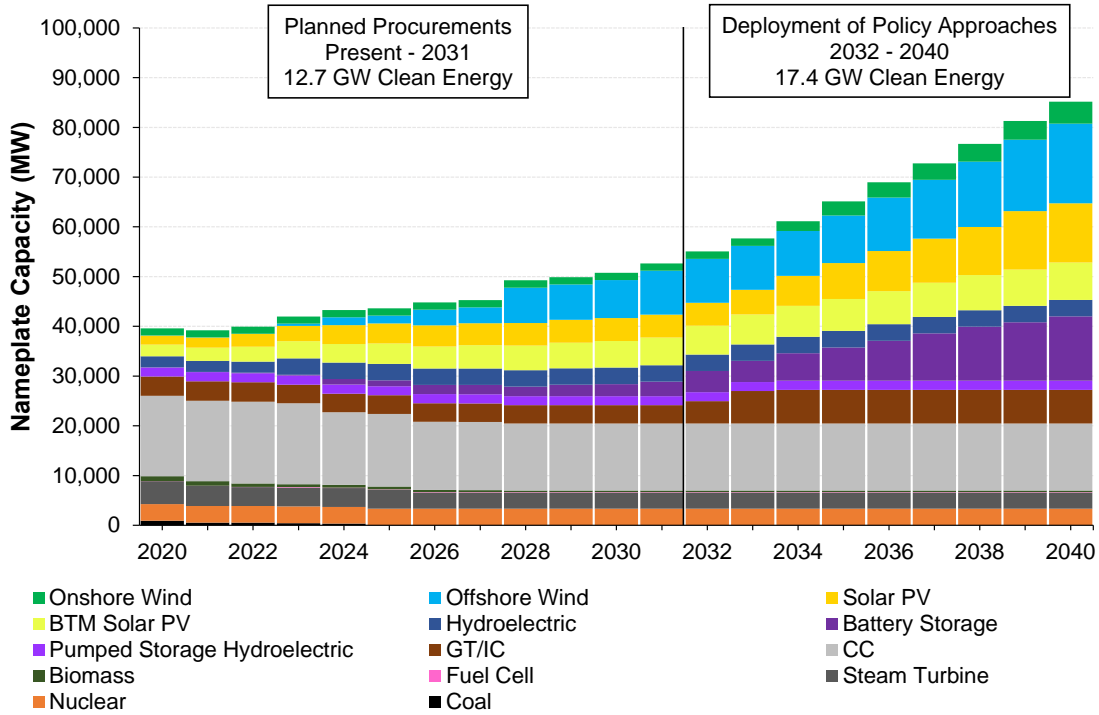


Figure V-2. Capacity Additions, Status Quo Policy Approach, 2021-2040 (MW)

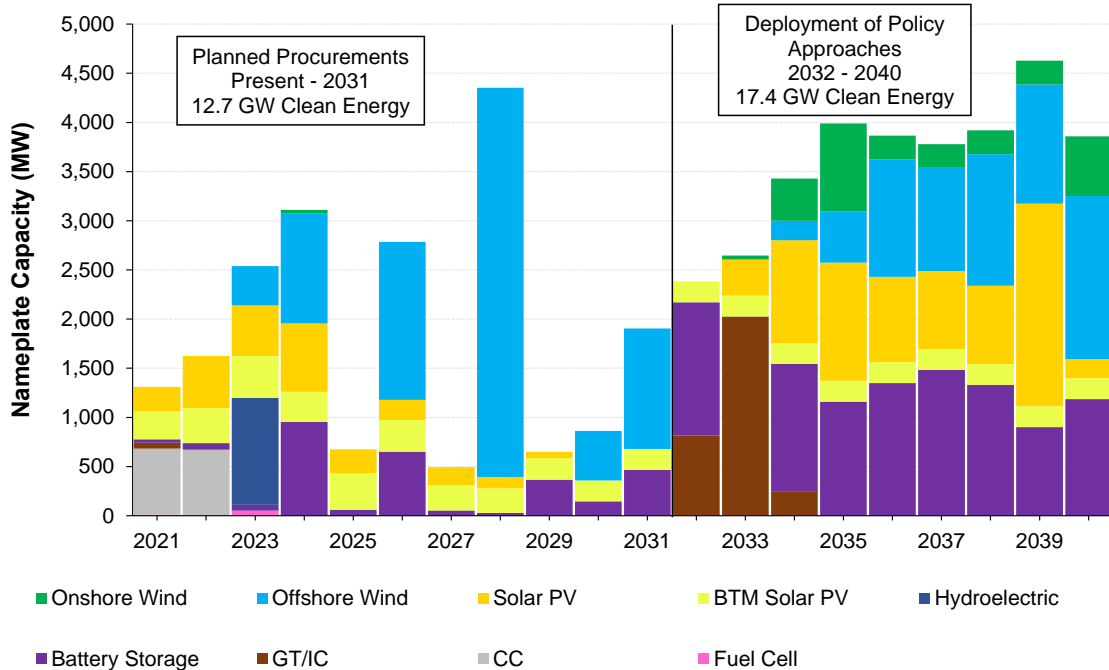


Table V-1. Change in Resource Mix from 2020 to 2040, Status Quo Policy Approach (MW)

| Unit Type | 2020 Baseline | Capacity in 2040 (MW) | Change in Capacity: 2020 to 2040 (MW) |
|------------------|----------------------|------------------------------|--|
| Biomass | 972 | 361 | -612 |
| BTM Solar PV | 2,363 | 7,500 | 5,137 |
| CC | 16,158 | 13,474 | -2,684 |
| Coal | 917 | 0 | -917 |
| Battery Storage | 8 | 12,953 | 12,945 |
| Fuel Cell | 30 | 94 | 64 |
| Hydroelectric | 2,234 | 3,311 | 1,077 |
| GT/IC | 3,893 | 6,765 | 2,873 |
| Nuclear | 3,349 | 3,349 | 0 |
| Offshore Wind | 29 | 16,014 | 15,985 |
| Pumped Storage | 1,826 | 1,826 | 0 |
| Solar PV | 1,807 | 11,928 | 10,121 |
| Steam Turbine | 4,591 | 3,188 | -1,403 |
| Onshore Wind | 1,424 | 4,401 | 2,977 |

As we discuss in **Section VI**, the mix of substitutions that occurs to achieve decarbonization varies across policy approaches given differences in incentives created by each policy. However, the general pattern of changes in resource mix — more renewables and storage and less fossil generation — is the same across all policy approaches.

Below, we provide further discussion of the changes in resource mix by technology type:

- **Deployment of new clean energy resources.** The starting point for decarbonization is the deployment of new, clean energy capacity that can supply energy to displace energy generated from fossil resources. Under the Status Quo, solar, offshore wind, and onshore wind are the primary new forms of clean energy generation, reflecting current commercially viable technologies.

In the 2020s, new renewable resources enter largely as a result of the baseline state policies, common to all four policy approaches. Much of this new renewable capacity is offshore wind, reflecting planned procurements, largely comprised of projects in Bureau of Ocean Energy Management (“BOEM”) lease areas off the coast of Southern New England.

In the 2030s, new renewable capacity is mostly offshore wind and solar. In the Status Quo, these resource decisions reflect state roadmaps and plans. In the other policy approaches, the mix of resources reflects economic factors, with the model determining resource outcomes based on the financial incentives created by each approach with the goal of minimizing social costs. In these cases, the resulting resource mix reflects a combination of factors, particularly new build (capital) costs. These costs change over time due to multiple factors, particularly technological improvements (which lower costs and occur independent of resources developed in New England) and transmission and

siting considerations (which increase costs as earlier projects exploit the most favorable (lowest cost) transmission and siting resource opportunities).

Under the Status Quo, expanded clean energy supplies are the result of expanded state procurements throughout the study period. While the analysis includes state RPS at existing statutory levels, the RPS targets are not binding, and thus REC prices fall to zero, during the study period because the supplies procured through the state sponsored PPAs to meet the 80 percent regional decarbonization objective exceed the quantity of clean energy that would be incented by the RPS alone.¹⁰⁶

Another important factor is the interaction of supply from renewable resources with correlated output. These interactions have an important — but complex — impact on outcomes. Output from correlated renewables can lead to “economic curtailment” of supply because there is insufficient demand to consume all renewable output in some hours, particularly when demand is low but available renewable supply is high. This correlation in resource output, in turn, can diminish a resource’s competitiveness by reducing its effective supply (given the curtailments). Thus, a higher-cost renewable resource with output that is less correlated with other existing renewable resources may be more competitive than a less-costly resource with more-highly-correlated output, because its output is less likely to be economically curtailed or earn lower revenues for its energy, because of negative LMPs. We discuss economic curtailments in further detail, below in **Section V.B.3**.

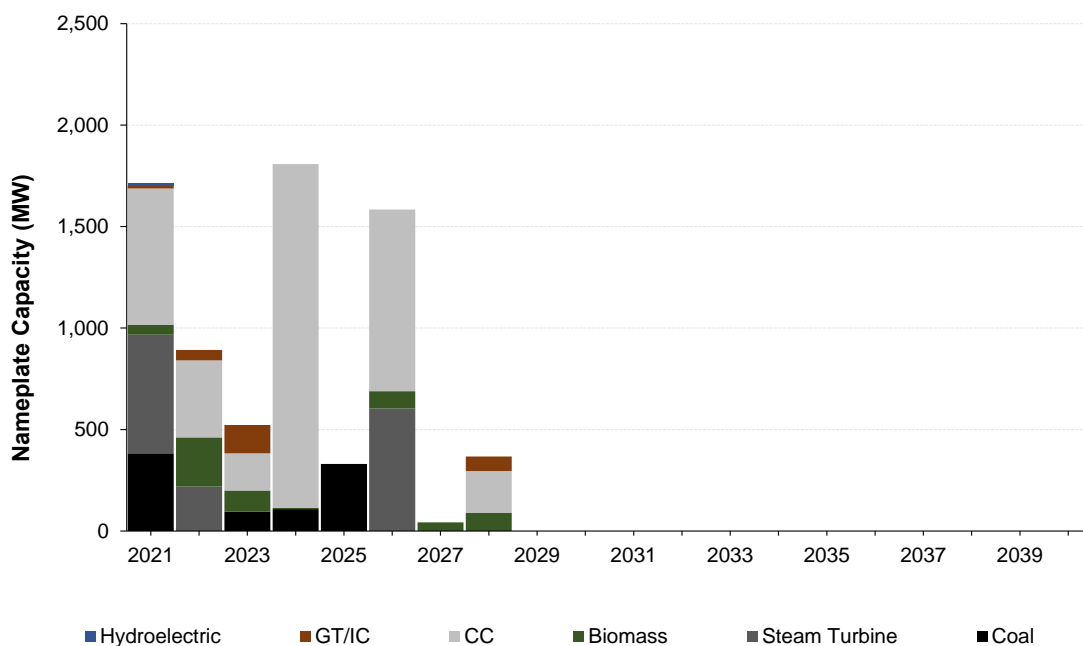
- **Entry, retention and retirement of fossil dispatchable resources.** From 2020 to 2040, dispatchable fossil capacity falls from 25.6 GW to 23.5 GW, reflecting both resource retirements and new entry. Although new renewable capacity is needed to achieve decarbonization targets, dispatchable fossil-fuel generation like natural gas fired combined cycle and combustion turbines is still needed to meet demand during periods of low variable renewable output (recall, the Central Cases assume the region targets an 80% reduction in carbon emissions, which still allow some carbon emissions to occur in 2040). In the Status Quo, as additional variable renewable resources come online and displace output from fossil fuel generation, total (net) energy market revenues for existing generators decline due to reduced capacity factors and lower hourly LMPs. However, until new technologies emerge that can cost-effectively offer long-term storage or zero-emissions dispatchable generation, fossil fuel generation appears likely to be needed to ensure resource adequacy.

Although some dispatchable technology is required to meet resource adequacy requirements, the transition to a low-carbon power system, along with other market forces, will lead to retirements of existing generators. Retirements are most likely for generators that are costly to operate (*i.e.*, high on-going fixed operation costs), are less efficient (*i.e.*, have higher heat rates), and are less able to quickly ramp up or down to meet load as variable renewable energy generation fluctuates. **Figure V-3** shows retirements under the Status Quo, which includes 6.6 GW of fossil fuel and 620 MW of biomass that retires before 2030. Most of this retired capacity reflects announced retirements, rather than

¹⁰⁶ When the supply of RECs created by state clean energy procurements exceeds regulatory requirements from state RPS, we expect the price of RECs to fall to zero in a competitive market.

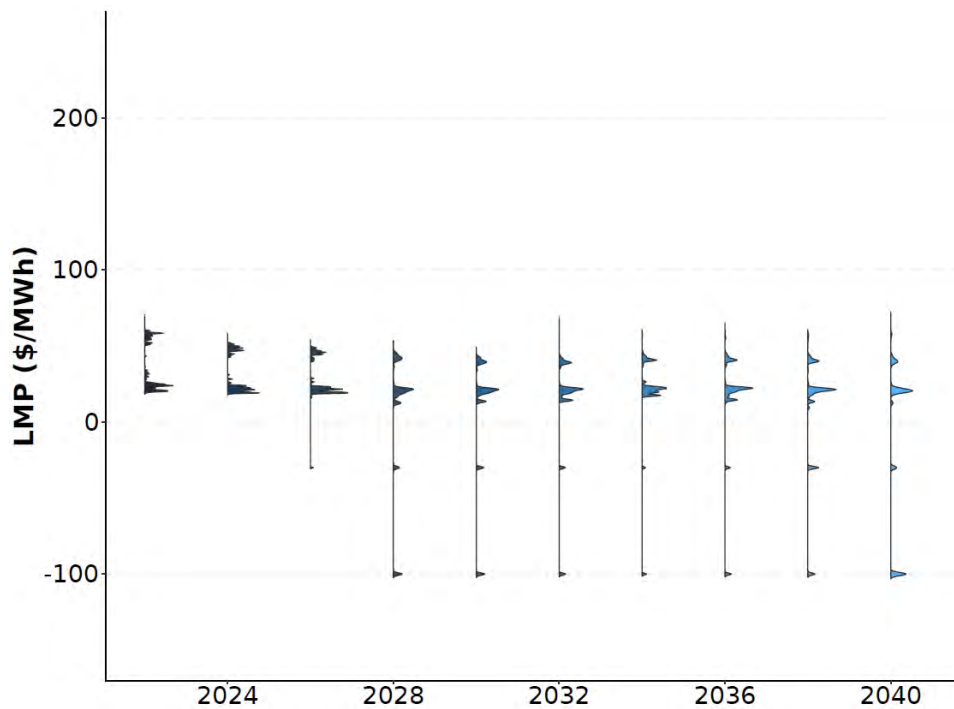
“economic” retirement decisions by units within the model. Economic retirements are limited, as the model finds that it is generally more cost-effective to retain existing capacity to meet the increasing resource adequacy requirements from electrification of other sectors of the economy (heating, transportation) than to retire this capacity and replace it with new capacity to meet the growing resource adequacy needs. In fact, under the Status Quo policy approach, 3.1 GW of new gas turbines are installed between 2032 and 2034 to help meet resource adequacy. However, on net, total retirements exceed new entry of fossil resources, reducing the total quantity of fossil-fired resources in the system, despite the total increases in peak loads across the study period.

Figure V-3. Capacity Retirements, Status Quo Policy Approach, 2021-2040 (MW)



- Development of storage resources.** Over the study period, there is substantial development of storage resources, which play an important role in maintaining resource adequacy in the modeled decarbonized system. Due to the expansion of variable renewable resources that may not provide energy supply during certain weather conditions (e.g., when the sun is not shining or the wind is not blowing), meeting customer loads in all hours requires dispatchable resources that can deliver supply to meet energy demand and reserve requirements, independent of weather conditions. As the emission target becomes more stringent, there is a need for a zero (or low) emission source of dispatchable electricity to maintain resource adequacy. Within our analysis, storage resources play this role, as we assume no backstop dispatchable zero-carbon technology, given their current lack of commercial viability. Moreover, the entry of 12.9 GW of new battery storage more than offsets the loss of 2.1 GW of fossil generation, allowing the system to maintain resource adequacy despite the increased loads from electrification of heating and transportation. In fact, by the end of the study period, battery storage more cost-effectively provides resource adequacy than gas-fired technologies.

Figure V-5. Distribution of LMPs by Year, Status Quo Policy Approach, 2022-2040 (\$2020/MWh)

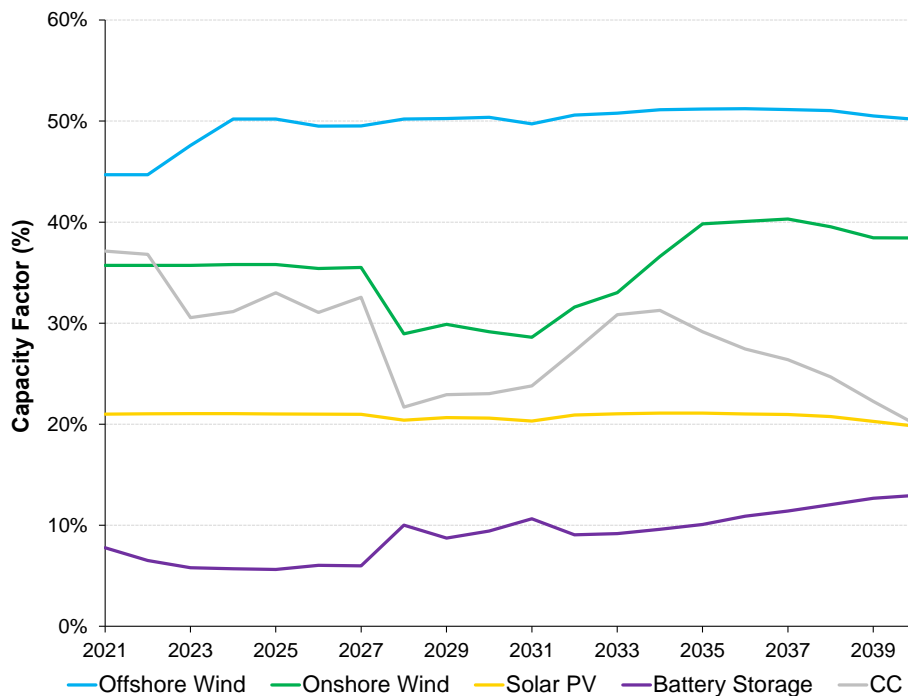


2. Implications for Gas-Fired Resources

For gas-fired resources, particularly combined cycle resources, total output declines across the gas-fired fleet, as much of their production is displaced by that from renewable resources with zero or very low operating costs. This decline in total output reflects both a decline in capacity and a decline in output per unit of capacity (“capacity factor”). **Figure V-6** shows the annual capacity factors for certain technologies over the period 2021 to 2040. Reduced capacity factors are consistent with declining prices over time — that is, with lower prices less efficient gas-fired capacity becomes less competitive.¹¹³ In effect, over time, energy from gas-fired resources is increasingly needed for load-following or peaking supply, rather than as a source of baseload energy. These changes reflect reductions in total energy supplied and increased volatility in load net of variable renewable generation.

¹¹³ We do not include combustion turbines in **Figure V-6** because energy supply from combustion turbines is limited and episodic in our analysis, due to, among other things, the model representing less real-time operational variability (e.g., plant and transmission outages) than what might occur in the real world.

Figure V-6. Capacity Factors for Combined Cycle, Battery Storage, Offshore Wind, Onshore Wind, and Solar PV, Status Quo Policy Approach, 2021-2040 (%)



3. Implications for Variable Renewable and Storage Operations

As variable renewable and storage resources become a larger fraction of system resources, interactions between these resources have important consequences for their operations and the output they supply.

a) “Economic Curtailment” of variable renewable generation

“Economic curtailment” refers to a reduction in the output of a generator relative to what it could have otherwise produced. Generally, curtailment can occur due to transmission congestion, lack of firm transmission access, or excess generation (“overgeneration”) during low load periods.¹¹⁴ Here, we focus on curtailment due to overgeneration,¹¹⁵ and refer to this as “economic curtailment” under the assumption that output is “economically” curtailed because the offer price exceeds the (potentially negative) LMP, rather than because of specific actions from ISO operators due to an imbalance between electricity supply and demand, and/or a physical constraint in the transmission system.

¹¹⁴ NREL (National Renewable Energy Laboratory). 2014. “Wind and Solar Energy Curtailment: Experience and Practices in the United States.” Golden, CO: National Renewable Energy Laboratory, available at <https://www.nrel.gov/docs/fy14osti/60983.pdf>.

¹¹⁵ Our quantitative model does not capture other forms of curtailment.

EXHIBIT 7



Energy Pathways to Deep Decarbonization

*A Technical Report of the Massachusetts
2050 Decarbonization Roadmap Study*

December 2020



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This report was prepared by Evolved Energy Research for the Commonwealth of Massachusetts as part of the Decarbonization Roadmap Study.

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Table of Contents

| | | |
|-----|--|-----|
| 1 | Executive summary | 1 |
| 1.1 | Main Findings..... | 1 |
| 1.2 | Decarbonization Pathways | 3 |
| 1.3 | Key Results | 3 |
| 2 | Introduction | 10 |
| 2.1 | Study framework..... | 10 |
| 2.2 | Study questions..... | 11 |
| 2.3 | The role of pathways in planning..... | 11 |
| 2.4 | Past work..... | 13 |
| 3 | Methodology overview | 16 |
| 3.1 | Modeling framework | 16 |
| 3.2 | Regional representation | 24 |
| 3.3 | Uncertainties and caveats..... | 25 |
| 4 | Pathway definitions | 29 |
| 4.1 | Energy & Industrial CO ₂ emission constraints | 31 |
| 5 | Results..... | 33 |
| 5.1 | Energy system overview | 33 |
| 5.2 | Emissions..... | 38 |
| 5.3 | Demand-side transition | 41 |
| 5.4 | Electricity..... | 51 |
| 5.5 | Fuels and carbon management | 65 |
| 5.6 | Cost | 69 |
| 6 | Discussion..... | 76 |
| 6.1 | Commonalities across pathways..... | 76 |
| 6.2 | Dynamics of resource competition | 81 |
| 6.3 | Renewable build | 87 |
| 6.4 | Electricity balancing | 90 |
| 6.5 | Electricity markets | 91 |
| 6.6 | Outstanding research questions | 92 |
| 7 | Appendix 1: Data inputs and assumptions | 94 |
| 8 | Appendix 2: Supplemental results | 109 |
| 9 | Appendix 3: Detailed model methods | 124 |

List of Figures

| | |
|---|----|
| Figure ES1. Four pillars of decarbonization for the All Options pathway..... | 2 |
| Figure ES2. ISO-NE system load shape comparison in 2050, after the dispatch of flexible loads..... | 5 |
| Figure ES3. All Options pathway daily operations for Massachusetts in 2050..... | 7 |
| Figure ES4. In-state vs. out-of-state spending on energy for the reference and all options pathways..... | 8 |
| Figure 1. Overview of the lifetimes of common energy consuming or producing infrastructure. | 13 |
| Figure 2. EnergyPATHWAYS and RIO modeling flow-chart using illustrative data | 16 |
| Figure 3. EP estimates system load shapes bottom-up | 18 |
| Figure 4. Relevant time scales in RIO along with the decision variables and key results for each. | 19 |
| Figure 5. Operational framework for the RIO model. | 19 |
| Figure 6. Study regions used in the EnergyPATHWAYS and RIO models. | 24 |
| Figure 7. Energy system Sankey diagrams for Massachusetts..... | 34 |
| Figure 8. Annual energy and industrial emissions for Massachusetts in 2050 for all pathways. | 39 |
| Figure 9. Annual energy and industrial emissions from 2020-2050 for Massachusetts for four pathways. | 40 |
| Figure 10. Annual final energy demand for Massachusetts by fuel type..... | 42 |
| Figure 11. Annual electricity final demand in Massachusetts for transportation, heating, and other. | 43 |
| Figure 12. Massachusetts final energy demand by sector between 2020 and 2050..... | 44 |
| Figure 13. Massachusetts building (residential + commercial) final energy demand by fuel type | 45 |
| Figure 14. Massachusetts residential building electrification..... | 46 |
| Figure 15. Massachusetts commercial building electrification..... | 46 |
| Figure 16. Massachusetts transportation final demand by fuel type compared between pathways. | 47 |
| Figure 17. Massachusetts on-road transportation subsectors. | 48 |
| Figure 18. Massachusetts final demand for fuels in industry. | 49 |
| Figure 19. ISO-NE electricity load decomposed into heating, transport, and other (All Options pathway)..... | 50 |
| Figure 20. ISO-NE electricity load decomposed into heating, transport, and other (Pipeline Gas pathway)..... | 50 |
| Figure 21. Massachusetts load in the All Options and Pipeline Gas pathways with end-use flexibility. | 51 |
| Figure 22. Massachusetts electricity consumption for end-use final electricity demand and energy conversion loads (electrolysis and electric boilers). | 53 |
| Figure 23. Massachusetts annual electricity supply by resource type for all pathways..... | 54 |
| Figure 24. (Top) Massachusetts electricity capacity by year and pathway. (Bottom) Average duration (hours) for energy storage in each year. | 55 |
| Figure 25. All Options pathway annual electricity supply by zone. | 57 |
| Figure 26. Daily average electricity operations in the All Options pathway, by zone. | 58 |
| Figure 27. ISO-NE renewable balancing..... | 59 |
| Figure 28. All Options pathway daily operations for Massachusetts in 2050..... | 61 |
| Figure 29. Average daily energy generation and load | 62 |
| Figure 30. Massachusetts coincident peak load by aggregate customer class..... | 65 |
| Figure 31. Massachusetts sources and uses of hydrogen, carbon capture, and biomass in 2050. | 67 |
| Figure 32. Massachusetts imports of carbon-neutral liquid hydrocarbons and methane (pipeline gas) | 68 |
| Figure 33. Massachusetts gross energy system cost. | 69 |
| Figure 34. In-state vs. out-of-state spending on energy. | 70 |
| Figure 35. Massachusetts net energy system cost for all net-zero pathways compared to All Options..... | 71 |
| Figure 36. Massachusetts net energy system cost broken out by cost component..... | 72 |
| Figure 37. Average societal electricity rate by component, across years and between pathways. | 74 |
| Figure 38. Four pillars of decarbonization for the All Options pathway. | 77 |
| Figure 39. Ground-mounted solar PV land-use estimates across pathways. | 88 |
| Figure 40. Average annual build rate by 5-year period for selected pathways. | 89 |
| Figure 41. Challenges in balancing high variable generation (wind & solar) systems. | 91 |
| Figure 42. Day binning fit statistics for Massachusetts..... | 94 |

| | |
|---|-----|
| Figure 43. Bioenergy supply curve | 96 |
| Figure 44. Behind-the-meter solar PV adoption scenarios by New England state | 101 |
| Figure 45. Annual energy and industrial emissions for ISO-NE states for each pathway | 109 |
| Figure 46. E&I emissions for ISO-NE states for the All Options pathway compared against reference. | 109 |
| Figure 47. Massachusetts annual E&I CO ₂ emissions for all pathways | 110 |
| Figure 48. Difference in final energy demand compared to the reference scenario for Massachusetts. | 110 |
| Figure 49. Regional final energy demand for ISO-NE states. | 111 |
| Figure 50. Massachusetts residential heating service demand | 111 |
| Figure 51. Electricity shapes for the Limited Efficiency pathway divided into heating, transport, and other. .. | 112 |
| Figure 52. ISO-NE system load shape comparisons, excluding transportation load..... | 112 |
| Figure 53. ISO-NE installed capacity by year across pathways. | 116 |
| Figure 54. Electricity supply in the Offshore Wind Constrained pathway for each zone in the Northeast..... | 116 |
| Figure 55. Electricity supply in the No Thermal pathway for each zone in the Northeast. | 117 |
| Figure 56. Zonal electricity generation shares for each pathway | 117 |
| Figure 57. Transmission maps showing total 2050 transfer capability between zones. | 118 |
| Figure 58. Massachusetts energy storage state of charge at the end of each day in 2050 | 118 |
| Figure 59. Installed capacity in Quebec | 119 |
| Figure 60. All Options pathway daily energy operations for Quebec. | 120 |
| Figure 61. ISO-NE dispatchable or firm electricity capacity in 2050 across pathways. | 121 |
| Figure 62. Massachusetts net energy system cost broken out by final energy demand type..... | 121 |
| Figure 63. 2050 electrolysis capacity within each ISO-NE state compared between pathways..... | 122 |
| Figure 64. Four pillars of a net-zero energy system illustrated for the Pipeline Gas pathway. | 123 |
| Figure 65. Four pillars of a net-zero energy system illustrated for the Limited Efficiency pathway. | 123 |
| Figure 66. The basic calculation steps for EnergyPATHWAYS and outputs from each step. | 125 |
| Figure 67. Methods for projecting energy demand | 126 |
| Figure 68. RIO decision variables and results for each of the represented timescales | 142 |
| Figure 69. RIO operations framework..... | 146 |
| Figure 70. Reliability framework in high renewable systems | 148 |
| Figure 71. RIO fuels framework | 149 |

List of Tables

| | |
|---|-----|
| Table ES1. Summary of pathways analyzed..... | 3 |
| Table 1 Analyses for Massachusetts net-zero by 2050 report..... | 10 |
| Table 2 List of important RIO features and parameters | 20 |
| Table 3 List of energy system costs included in this analysis..... | 22 |
| Table 4 Key data assumption summary table. | 23 |
| Table 5 Key areas of uncertainty in modeling decarbonized energy systems in Massachusetts | 26 |
| Table 6 Scenario matrix contrasting the eight net-zero emissions pathways. | 30 |
| Table 7 Mapping from pathway to demand-side case. | 41 |
| Table 8. Cumulative transmission build 2020-2050 by pathway. | 64 |
| Table 9. Assumptions for the Pipeline Gas pathway high and low-cost sensitivities | 72 |
| Table 10. Pipeline Gas pathway cost sensitivity results..... | 73 |
| Table 11 Pipeline gas sales, revenue requirement, and implied societal rates | 75 |
| Table 12 Factors that change the relative competitiveness of decarbonized gas..... | 82 |
| Table 13 ISO-NE gas combined cycle gas turbine capacity factors by pathway | 92 |
| Table 14 Conversion technology sources..... | 96 |
| Table 15 Residential space heating cost and efficiency..... | 97 |
| Table 16 Residential water heating cost and efficiency..... | 98 |
| Table 17 Load shape sources | 98 |
| Table 18 Generator cost and potential assumptions..... | 101 |
| Table 19 Flexible load input assumptions | 102 |
| Table 20 Transmission assumptions | 102 |
| Table 21 Demand-technology sales share assumptions for select years..... | 103 |
| Table 22 Massachusetts electricity supply for all pathways. | 113 |
| Table 23 Gross Massachusetts energy system cost by category in 2050 | 122 |
| Table 24 Tabular I/O Matrix | 134 |
| Table 25 EnergyPATHWAYS supply-side delivery nodes..... | 136 |
| Table 26 Dependability factors used when enforcing RIO reliability constraints..... | 148 |

4 Pathway definitions

We explored eight net-zero emissions pathways for the Northeast. The analysis started by defining a pathway we call “All Options,” which was created using assumptions found compatible with deep decarbonization in previous studies. Pathways are varied one dimension at a time in order to isolate the impact of specific factors. The eight pathways are described in Table 6. The dimensions of variation studied include:

- Behind the meter (BTM) solar and flexible end-use load explored in the “DER Breakthrough” scenario;
- Rates of building and industry electrification explored in the “Pipeline Gas” scenario;
- Deployment of energy efficiency explored in the “Limited Efficiency” scenario;
- Ease of transborder infrastructure development explored in the “Regional Coordination” scenario;
- Availability of gas thermal power plants explored in the “No Thermal” scenario;
- Cost and potential of offshore wind in the “Offshore Wind Constrained” scenario;
- And, the availability of non-renewable inputs to the 2050 energy system (excludes nuclear & fossil) in the “100% Renewable Primary” scenario.

Aside from the differences highlighted in Table 6, data and assumptions are shared between all pathways. For example, all scenarios meet the same demand for energy services,²⁵ assume the same cost for demand-side technology adoption, and meet the same emissions targets. Data inputs are from public sources and are provided along with important assumptions in Section 7. The assumption of consistent service demand is of particular importance as a design criterion as a way to show the feasibility and affordability of a technological transition to deep decarbonization. With this in mind, energy conservation and lifestyle change could significantly ease parts of the transition.

For several pathways listed in Table 6, descriptors “High,” “Medium,” and “Low” are used as a shorthand for describing the assumptions. This shorthand is used due to the complexity of the inputs, which are difficult to describe succinctly in one table row. For example, different heat pump adoption rates are specified for space and for water heating, each separately for residential and commercial customers. The detailed sales share inputs and resulting stock shares are provided for Massachusetts in Section 7.14.

An important clarification is that the pathway titled “All Options” pathway is not meant to be interpreted as an endorsed pathway for the Commonwealth. Indeed, it is not lowest cost or necessarily preferred along other dimensions. Instead, the role of “All Options” is as a point of comparison between different pathways—a role that is played by a reference or baseline scenario in most studies. This study is not an investigation of whether Massachusetts should decarbonize,²⁶ given that the net-zero target is current state policy; thus, a reference scenario, while it was developed, is not a focus within the results.²⁷ Thus, the seven other pathways represent deviations from All Options meant to explore how technological evolutions could ease the transition to a net-zero future or how certain constraints or secondary goals could make that transition different, if not more

²⁵ For example, demand for maintaining a comfortable indoor temperature can be met using any combination of fossil energy (e.g. natural gas-fired furnaces), electric energy (e.g. heat pumps), and efficiency measures (e.g. air sealing and weatherization).

²⁶ This report does not discuss the quantitative benefits from avoided climate damages or the cost of climate adaptation, and thus, gives an incomplete picture of the societal net benefits of decarbonization. Many of these elements are discussed in the Roadmap Study.

²⁷ The reference scenario represents a baseline loosely based on the 2019 U.S. Annual Energy Outlook. Carbon emissions are not capped, and only minor changes are assumed to occur on the energy demand-side. For example, electric vehicle adoption is much lower than assumed in the decarbonization pathways.

difficult. The Pipeline Gas pathway assumes low electrification of gas applications in buildings and industry (e.g. water heating). Other types of electrification are still assumed, for example heat pumps still replace fuel oil in buildings. The Pipeline Gas pathway does not pre-constrain the composition of gas in the pipeline (e.g. biogas or hydrogen) but instead solves for this mix in the supply-side optimization in RIO, which is subject to the emissions constraints.

Table 6 Scenario matrix contrasting the eight net-zero emissions pathways. The “All options” scenario serves as a common point of comparison across the seven variations that test key uncertainties or explore alternate strategies. The differences from the All options scenario are highlighted in orange. Each of the qualitative descriptions (e.g. high vs. low) are defined in Section 7.

| | All Options | DER Breakthrough | Pipeline Gas | Limited Efficiency | Regional Coordination | No thermal | Offshore Wind Constrained | 100% Renewable Primary |
|-------------------------------------|---|---|---|---|---|---|---|---|
| Mass BTM solar in 2050 | 7 GW | 17 GW | 7 GW | 7 GW | 7 GW | 7 GW | 7 GW | 7 GW |
| Flexible end-use loads | Medium | High w V2G | Medium | Medium | Medium | Medium | Medium | Medium |
| Building & industry electrification | High | High | Low electrification of pipeline gas applications | High | High | High | High | High |
| Energy Efficiency | High | High | High | Reference efficiency across buildings, industry and transport | High | High | High | High |
| Captured CO ₂ Export | No | No | No | No | Yes | No | No | No |
| Intra-regional transmission cost | \$5,600/MW-mile within New England; \$9,400/MW-mile to Quebec | \$5,600/MW-mile within New England; \$9,400/MW-mile to Quebec | \$5,600/MW-mile within New England; \$9,400/MW-mile to Quebec | \$5,600/MW-mile within New England; \$9,400/MW-mile to Quebec | \$3,300/MW-mile within New England; \$4,700/MW-mile to Quebec | \$5,600/MW-mile within New England; \$9,400/MW-mile to Quebec | \$5,600/MW-mile within New England; \$9,400/MW-mile to Quebec | \$5,600/MW-mile within New England; \$9,400/MW-mile to Quebec |
| New gas power plants | Disallowed in Massachusetts | Disallowed in Massachusetts | Disallowed in Massachusetts | Disallowed in Massachusetts | Disallowed in Massachusetts | Disallowed everywhere | Disallowed in Massachusetts | Disallowed in Massachusetts |
| New offshore wind power plants | Economic, ATB low | Economic, ATB low | Economic, ATB low | Economic, ATB low | Economic, ATB low | Economic, ATB low | 30 GW Northeast Cap w ATB mid | Economic, ATB low |
| New nuclear power plants | Disallowed | Disallowed | Disallowed | Disallowed | Disallowed | Disallowed | Economic ²⁸ | Disallowed |
| Existing nuclear | Maintain | Maintain | Maintain | Maintain | Maintain | Maintain | Maintain | Retire |
| Use of fossil fuels | Constrained by emissions | Constrained by emissions | Constrained by emissions | Constrained by emissions | Constrained by emissions | Constrained by emissions | Constrained by emissions | No fossil fuels in 2050 |

²⁸ A base assumption of ‘no new nuclear build’ in the Northeast was implemented due to the perceived difficulty of siting new nuclear and noting it was not a necessary part of the solution in test runs. However, the study team also had interest in a ‘nuclear breakthrough’ scenario. Due to limitations on the total number of pathways we could study, the decision was made to add economic nuclear to the Offshore Wind Constrained scenario. The underlying assumption was that if any scenario would best highlight the potential role for nuclear, it was one in which offshore wind was limited.

Creating the eight pathways in the analysis was an iterative process that started with observing early model results from the All Options pathway and soliciting feedback on the list of uncertainties in Section 3.3.2. For example, after noting the importance of offshore wind to New England in early runs, the “Offshore Wind Constrained” scenario was devised to test how increases in offshore wind cost and decreases in potential would impact the results. Other pathways were developed in response to key questions on the minds of stakeholders or state policymakers, such as the role for gas in buildings and power plants or the feasibility of an energy system in 2050 that uses zero fossil fuels.

The eight pathways are themselves not exhaustive and leave some of the uncertainties described in Section 3.3.2 as subjects for future work. However, the primary goal in the pathways design was accomplished, which was to perturb the All Options pathway in various ways (some making decarbonization more challenging, others less), in order to observe the commonalities between all pathways that achieve Net Zero. The use of pathways is discussed further in Section 2.3.

4.1 Energy & Industrial CO₂ emission constraints

The emission of CO₂ from the energy and industrial sectors represents the largest, but not the only contributors to economy-wide net-zero GHG emissions. The companion *Non-Energy Technical Report* found that emissions of fluorinated compounds, fugitive methane, and other non-combustion emissions could be limited to 4.6 MtCO₂e in 2050. Meanwhile, the Land-Use study analyzed how natural and working lands in the Commonwealth can help remove residual emissions in 2050 in order to bring Massachusetts towards a net-zero economy. However, because the Massachusetts GHG Inventory (a matter of law) is currently a gross emissions accounting framework, this report makes no attempt to resolve how biogenic sequestration of carbon in natural and working lands might impact a net-zero emissions accounting. During the framing of this study, EEA undertook a process to seek public comment on setting a gross emissions limit in support of net-zero emissions at an 80%, 85%, or 90% reduction from 1990 emissions levels by 2050. While the Secretary of EEA ultimately determined that 85% was the most appropriate gross emissions reduction goal, the timing considerations required that modeling for this study needed to be underway prior to that determination. Thus, the project team was instructed to target the upper bound of those options (90% or 9.5 MtCO₂e). Leaving a set-aside for the 4.6 MtCO₂e from the non-energy sector in 2050, this left the energy and industrial sectors with a reduction target of no more than 5 MtCO₂e in 2050. Interim years (e.g., 2030, 2040) were set as a straight-line reduction from the previously established 2020 emissions limit to the 2050 modeling target.

The emissions accounting framework used in this study is based on the system used for the Massachusetts GHG inventory but differs in several ways based on the net-zero framing.²⁹ Emissions rates for electricity generators were benchmarked against the factors assumed in the 2017 MassDEP GHG Emissions Inventory; this approximates, but does not precisely replicate the interstate emissions accounting system MassDEP uses. Within Northeastern states, imports of net-zero carbon liquid or gaseous fuels was an option in the model as a replacement for fossil fuels in applications such as aviation or building heating. Combusting these biomass- or electricity-derived synthetic fuels would result in positive gross carbon emissions within Massachusetts, but the carbon in these fuels is assumed to come either from the atmosphere or from captured carbon that would

²⁹ Until very recently, Massachusetts GHG targets were based on a gross emission reduction target. The assumptions made in this analysis were made for expedience and do not resolve all questions or endorse a specific methodology in the inventory moving forward.

5 Results

The results of the modeling are described below in six subsections, beginning with an overview of the 2050 energy system, followed by a detailed examination of emissions, energy end uses, electricity, fuels, and costs. In most cases, the results focus on Massachusetts only, but regional snapshots are also provided.

Supplemental results figures and tables are provided in Section 8. For clarity and economy of space, not all pathways are shown in all figures in this section, but in general the full set can be found in the supplemental results.

This section focuses on describing the technical results of the modeling with a minimum of commentary. The subsequent section discusses the main conceptual findings revealed by the modeling. The discussion section identifies and elaborates on commonalities and contrasts found across cases, referring back to the results presented below.

5.1 Energy system overview

The 2050 energy systems that reach a net-zero E&I CO₂ target look dramatically different from today's. A series of "Sankey diagrams" (Figure 7) provide an overview of this transformation, and illustrate at a high level how energy is produced and consumed in a net-zero system in 2050. Sankey diagrams show the flow of energy through the economy, with the left-hand side showing primary energy supplied within Massachusetts, and imports into Massachusetts, and moving through various conversion processes, such as electricity generation, to end-use consumption in buildings, industry, and transportation on the right-hand side.

The first diagram shows the current energy system of Massachusetts in 2020. Almost all energy is provided by imports of petroleum or natural gas. Natural gas use is split between buildings and electricity generation. Electricity is primarily consumed in buildings. Transportation consumes most of the petroleum, but some is consumed in buildings (distillate oil-based heating) and some in industry. Industrial energy demand in Massachusetts is small compared to consumption in buildings and transportation but has the most diverse set of final energy supplies, requiring electricity, liquids, asphalt, pipeline gas, and steam.

The second diagram shows the All Options net-zero pathway in 2050, which has dramatically different energy flow patterns. Overall, energy demand has decreased, electricity dominates end uses, and the source of primary energy has shifted away from fossil fuels and toward renewables. Final energy demand in buildings and transportation has decreased by about half due to same-fuel efficiency improvements plus the efficiency benefits that come from electrification.

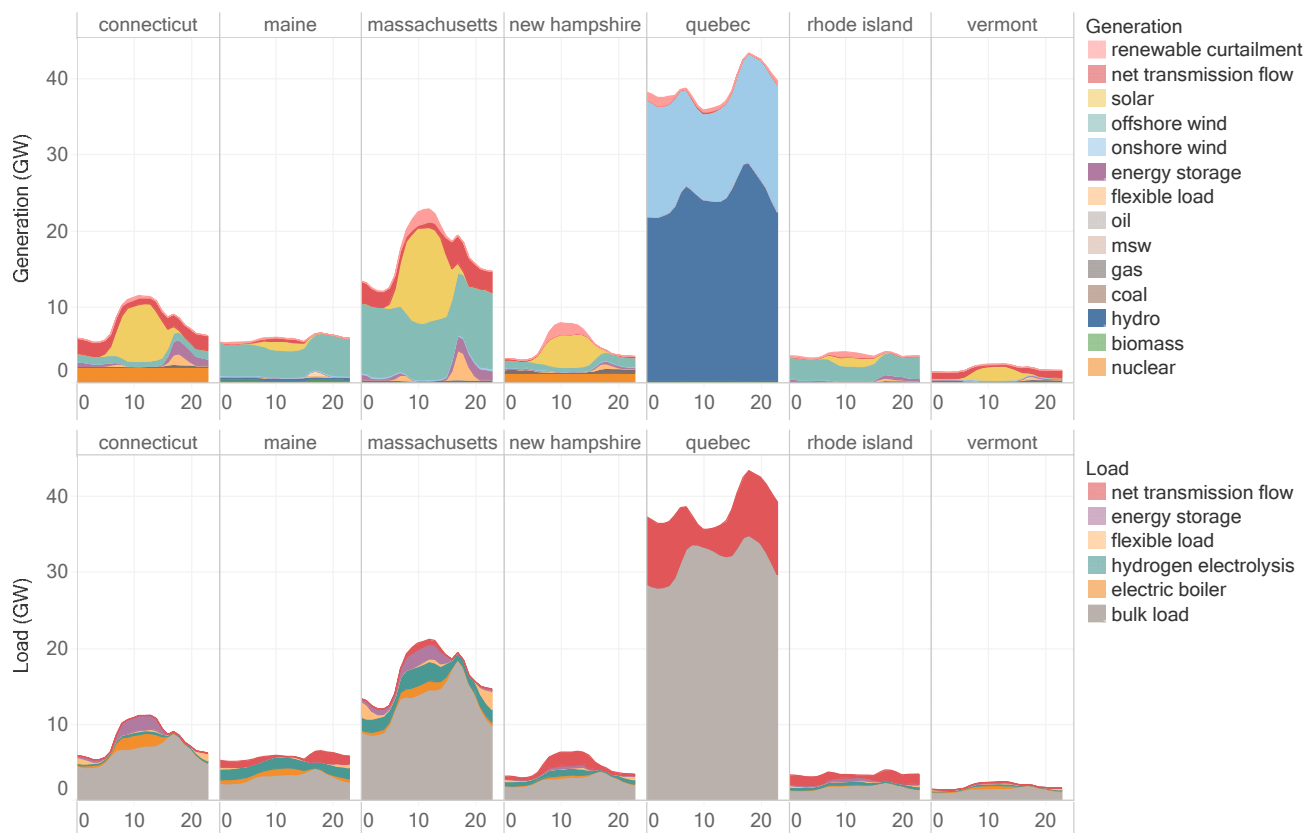
The process of electrification has created new connections that do not exist at a significant level in the current system (i.e. electricity in transportation), and roughly doubles the amount of final energy demand that must be supplied by electricity. Electricity also has an additional new role as an intermediate energy carrier used in the production of steam and hydrogen.

Hydrogen emerges as an important final energy carrier in transportation, with small amounts also used in industry. The source of electricity has shifted away from natural gas and towards solar and offshore wind. Both net imports and net exports of electricity have increased, indicating increased regional interdependence. Both natural gas and petroleum are still imported but decreased to roughly one-tenth of today's quantity, with new carbon neutral imported fuels taking their place in some applications. In-state biomass use has not grown but

has shifted towards fuel production rather than electricity generation. Liquid and gaseous fuels are still important energy carriers (for example, in aviation), but due to electrification and efficiency the quantity of fuels required is greatly reduced.

Figure 7 Energy system Sankey diagrams for Massachusetts show the flow of energy from primary sources or imports (left) through conversion processes (middle) to final energy demand or exports (right). The width of each line is proportional to the energy flow with units shown in TBtus. Diagrams are shown for the 2020 energy system and for the eight decarbonization pathways in 2050, across three pages. The difference in line width between flows into a node and out of a node represents energy losses during conversion or delivery. To improve readability, annual flows smaller than 3 TBtus are excluded—for example, the small amount of LPG used in buildings in 2050 does not appear. Net annual transmission flows from/to neighboring regions are shown across the top of each figure and abbreviated “TX”. In the Pipeline Gas and 100% Renewable Primary pathways, hydrogen is produced from electrolysis and some of it is used later to generate electricity; only the net flow is shown (in these pathways more hydrogen is produced than is consumed in electricity).

Figure 26. Daily average electricity operations in the All Options pathway, by zone. (Top) Generation, imports, storage discharge, and curtailment. (Bottom) Load, imports, and storage charging. Flexible load on the generation side represents a reduction in bulk load. The hours to which this load has been shifted is shown in the same color in the load panel. Because an average value for all days is displayed, artifacts of the diversity between days are apparent in the figure. For example, in Massachusetts at mid-day, renewable curtailment and transmission imports can both be seen occurring in the same hour; however, in actuality, both do occur, but on different days.



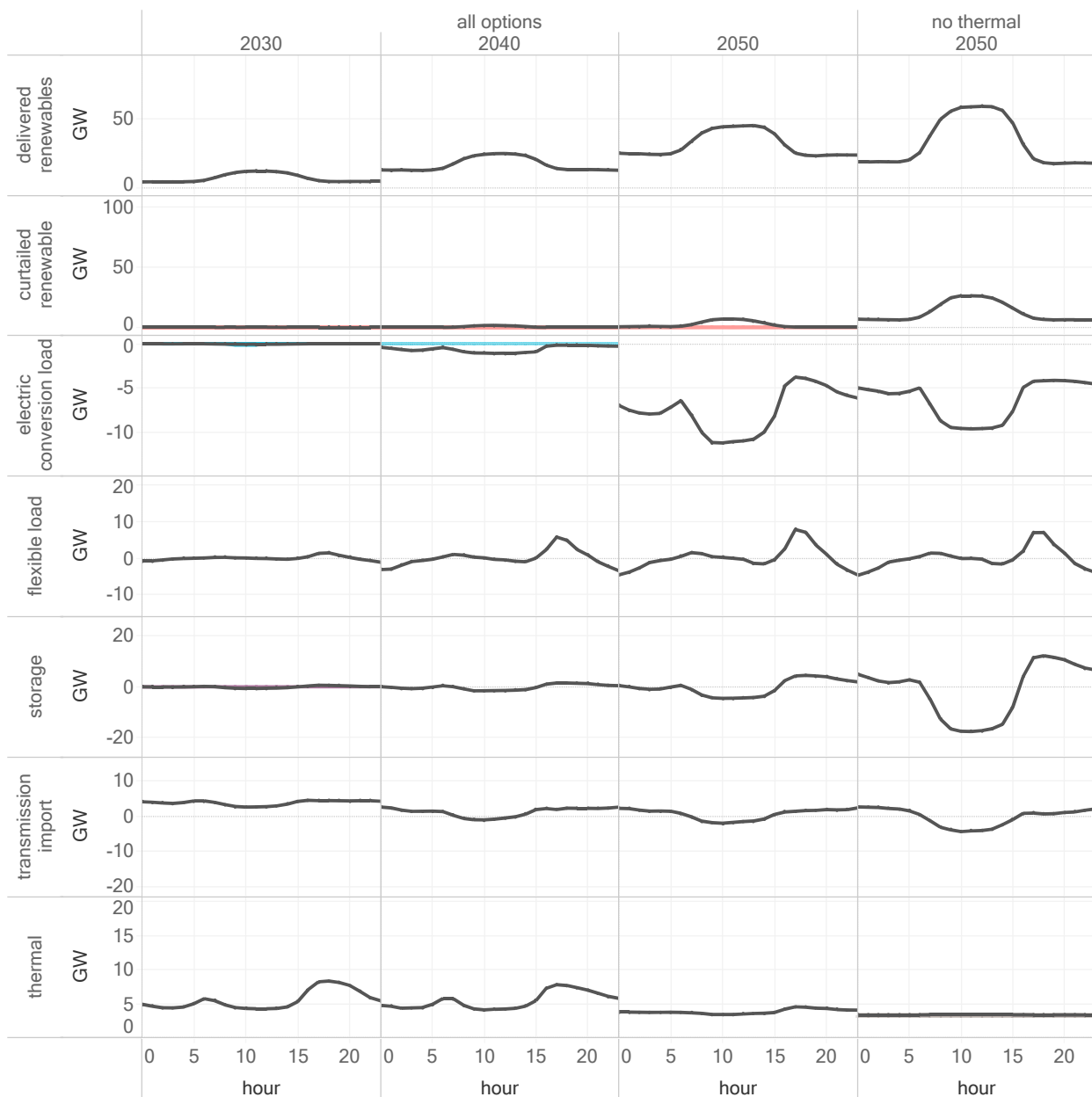
5.4.3 Operations and renewable balancing

The electricity systems in all the pathways studied had high penetrations of wind and solar generation, as described in the previous section. This outcome was not pre-ordained, but was the solution selected by the RIO optimization model for the lowest cost electricity system consistent with the net-zero emissions target. However, although wind and solar generation have substantially lower levelized cost of energy than any other technology considered, they do present unique operational challenges due to their variability. “Renewable balancing” is the term that describes the operational measures used to address the mismatch between variable renewable supply and must-serve load. Sometimes renewable supply is far in excess of load, leading to curtailment of renewable generation and reducing the economic competitiveness of these resources. At other times, a shortfall of renewable generation on the system results in the need for dispatchable resources to maintain system reliability. System operators must forecast both surplus and deficits, or “net load,” with sufficient lead time to apply a suite of tools that enable the system to maintain reliability while meeting carbon constraints at low cost.

The deployment of each of these balancing tools, aggregated for all of ISO-NE, is shown in Figure 27. The first three columns show the All Options pathway in 2030, 2040, and 2050. The right-most column shows the No Thermal pathway in 2050, in order to illustrate the measures required to replace all thermal power plants without harming reliability. In each row of the chart, a series of translucent colored lines is shown, one for each of the 45 sample days used by RIO. The solid black line is the average of all the sample day values.

The top row of the chart shows delivered renewables and the second row shows curtailed renewables, with the sum of the two being total generation potential. Although various balancing strategies are applied to minimize curtailment, curtailment is also a critical balancing strategy. Designing a system to have no curtailment would significantly increase overall system cost because (1) it would have a lower renewable capacity build, resulting in a larger generation deficit, and a consequent need for other, more costly generation resources, at times of the year when load exceeds renewable generation, and/or (2) it would require overbuilding other balancing resources such as energy storage that are expensive and would be infrequently utilized on the margin.

Figure 27. ISO-NE renewable balancing in the All Options pathway in 2030, 2040, and 2050, and in the No Thermal pathway in 2050. Each sample day (45 total) is shown using stacked colored lines with the average across all sample days shown in black. Note that the scale is different for each row. Negative values indicate storage charging or an increase in load while positive values indicate generation or a decrease in load.



The third row of Figure 27 shows electric conversion loads. These are electric boiler and electrolysis loads that are large (5-10 GW on average in 2050) and are not must-serve. Electric boilers are built in a dual-fuel configuration that allows use of gas when electricity is not available or not at the desired price. Hydrogen can be stored, blended into the pipeline, or produced by other methods, including imports, when not available via electrolysis. As evident in the figure, on some days electric conversion loads do not operate at all, and on other days they average 10-15 GW during most of the day. The importance of this conversion load strategy for high renewables power systems cannot be overstated. By providing a productive use for surplus renewable generation on days with low loads, additional renewable capacity can be built to provide energy at times when there would otherwise be larger renewable deficits. Put another way, conversion loads enable a strategy of “overbuilding” renewables that permits wind and solar to be utilized to the maximum extent for the energy system as a whole.

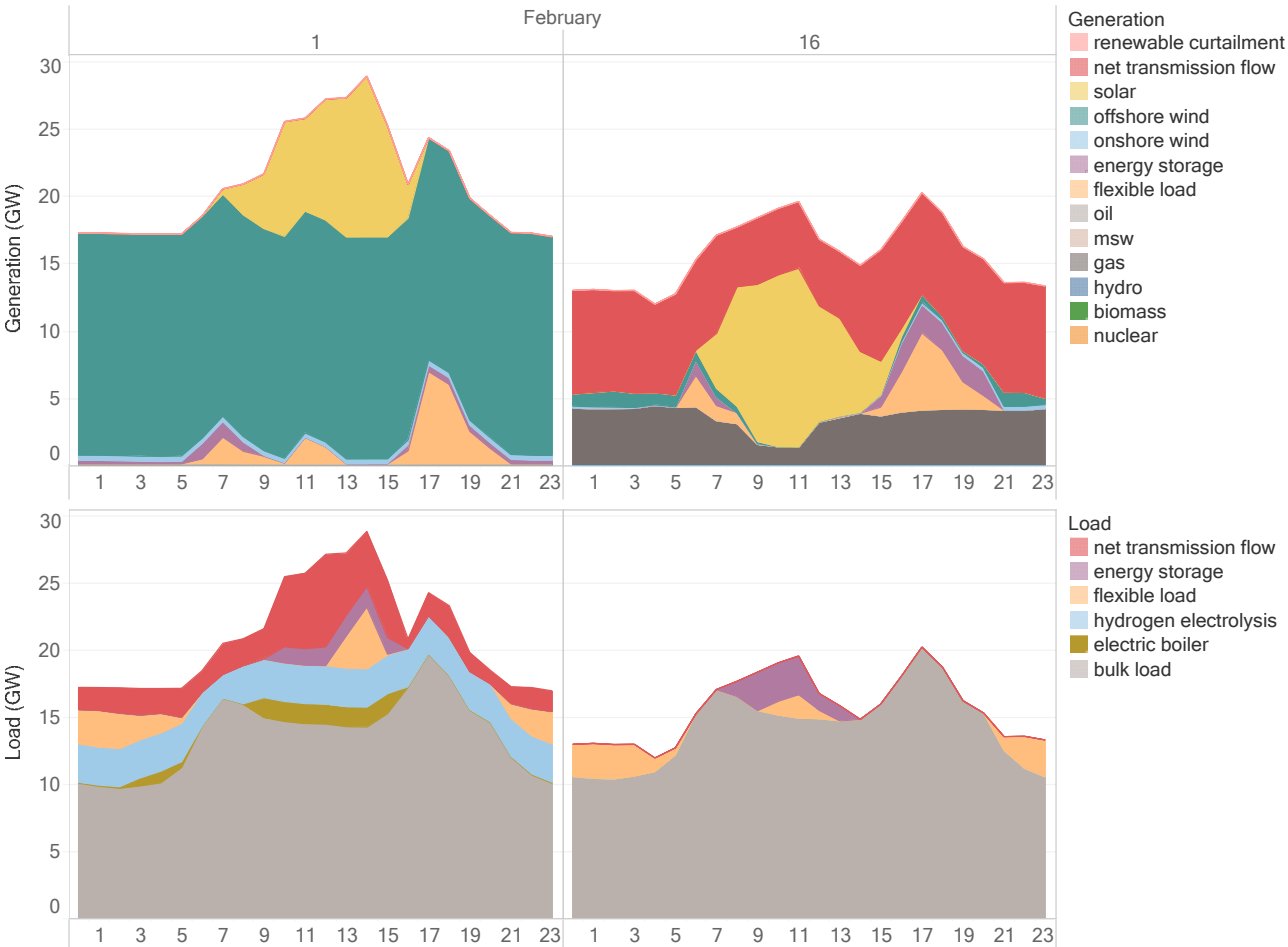
The fourth and fifth rows show flexible load and energy storage. Both show values above and below the x-axis, with positive values representing storage discharge or a reduction in load, and negative values indicating storage charging or an increase in load. The main source of flexible load is delayed EV charging, moving the charging load out of the 5-8 pm window to the middle of the night. The flexible use of space heating is also apparent in a narrow morning spike. The diurnal EV and heating loads modeled here do not have the flexibility to shift load into the middle of the day when solar is available; this is where energy storage is most critical. Energy storage discharges, on average, during nighttime hours with a large discharge peak in the evening and a smaller peak in the morning. Storage dispatch in the No Thermal pathway dwarfs that in the All Options pathway. The large amount of storage required to maintain reliability in the No Thermal pathway also competes with electric conversion loads for the use of renewable over-generation, which is why there is lower conversion load in this pathway. The state of charge over the course of the year for the long-duration storage built in the No Thermal pathway is shown for Massachusetts in the technical supplement, Figure 54.

The second to last row of Figure 27 shows net transmission flow into (positive) and out of (negative) ISO-NE. Over time, transmission flows become increasingly variable as a way of compensating for mismatches between renewable supply and generation, and the magnitude of the flows grow with transmission capacity, as discussed in Section 5.4.4. All pathways use the Quebec hydro system in effect as a form of seasonal energy storage, with energy exported to Quebec during many hours to serve Quebec loads, and with imports from Quebec in other hours to serve loads in New England and New York. Because it lacks thermal generation, dispatchable hydro capacity is of especially high value in the No Thermal pathway, and it therefore builds larger interties to Quebec than in any other pathway. No Thermal is also the only pathway in which it was found economical to build new hydro in Quebec beyond that which is already assumed. The hydro capacity build in Quebec is shown in the technical supplement, Figure 56.

The bottom row shows the operation of gas thermal power plants. An interesting trend emerges from 2030 to 2050 period, as the average daily use of gas capacity (shown by the solid black line) decreases, but maximum daily use increases. In the All Options pathway in 2050, one sample day in particular stands out from the rest (the uppermost translucent grey line). On this day, the electricity system requires almost 15 GW of thermal generation, dispatched across all hours, to maintain reliability. It is the effort to replicate this level of sustained energy production—potentially over multiple days in a row during a prolonged wind drought—that requires a very large amount of energy storage in the No Thermal pathway.

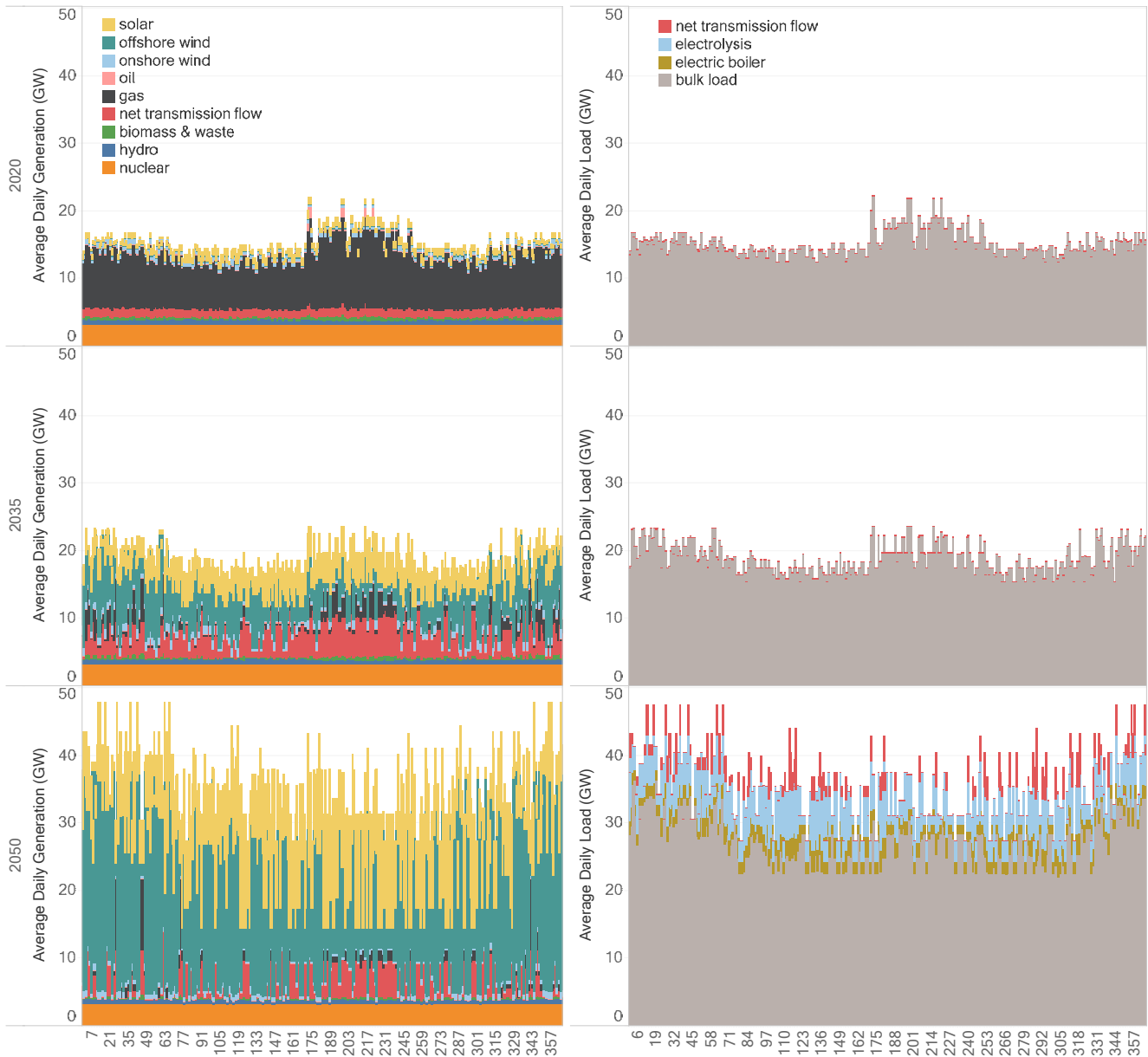
The sample day with 24 hours of gas thermal dispatch is February 16th. Figure 28 contrasts this day with February 1st from the same 2012 weather-year for the All Options pathway in Massachusetts. On February 1st, the output of offshore wind is close to its nameplate capacity for the entire day. The system is balanced by exporting energy to surroundings ISO-NE states and to Quebec and operating electrolysis and electric boiler loads. Two weeks later, on February 16th, the lowest offshore wind production of the year occurs. On this day, gas generation is needed in every hour of the day in combination with the maximum possible transmission imports from Quebec. Solar production is significant for a winter day, but still far too small to meet total energy demand. Any loads that are not “must-serve” are turned off during the day, so there are no electrolysis or electric boiler loads on this day. While keeping thermal generating capacity online when it is infrequently used may seem inefficient when viewed from the perspective of its contribution to annual energy production (Figure 23), the steps required to maintain today’s electricity system reliability without this capacity on days like February 16th turn out to be extremely costly. Solar shows less day-to-day variability than offshore wind in New England, which is the primary reason for the large overbuild of solar in the No Thermal pathway. By greatly increasing solar generation on February 16th, the amount of energy to be provided by energy storage can be reduced. The flip side of this strategy occurs during other times of the year when up to 100 GW of renewables are curtailed at once across the region (Figure 27). Across New England, 25% of potential renewable generation is curtailed in the No Thermal pathway, compared to about 4% in All Options.

Figure 28. All Options pathway daily operations for Massachusetts in 2050. February 1st (a high offshore wind generation day) is contrasted to February 16th (lowest offshore wind day of the year). Generation is shown in the top panel and load in the bottom panel.



To further illustrate the operational implications of the sample days discussed above, average daily generation and load in ISO-NE across 365 days in 2020, 2035, and 2050 (based on the 2012 weather year) is shown in Figure 29.

Figure 29. Average daily energy generation and load in the All Options pathway for ISO-NE in 2020, 2035, and 2050, based on the 2012 weather year. Electricity supply is on the left and load on the right. Net transmission flows on the supply side represent net daily imports, and on the load side represent net exports. Energy storage is omitted in the figure because in all pathways except No Thermal, only small amounts of energy are shifted between days. From an daily energy perspective, storage appears primarily as a load, representing round-trip losses.



The three snapshot years illustrate the trends discussed so far. In 2020, gas generation follows load, oil generation is used on peak days, net daily imports occur on every day of the year, and the days with highest average energy consumption are in the summer. Renewables are meaningful but still small. In 2035, the system has winter days with load equal to that of summer peak days, and yet overall load has not yet grown substantially. Sales shares of electric technologies are high, as described in Section 5.3 and Figure 14, Figure 15, and Figure 17, but the stock itself is not yet highly electrified. High levels of solar and offshore wind are

apparent in 2035 and while exports from ISO-NE are not yet seen, imports to ISO-NE vary significantly across days as a function of load and renewables. Days of high thermal power plant use can be seen throughout the year, concentrated mainly during summer and winter peaks. Finally, in 2050 the full set of balancing strategies is on display. Final energy demand has grown dramatically as electric technology stocks finally reach saturation levels. Renewable generation has also grown dramatically. Large electrolysis and boiler loads, and exports from ISO-NE, occur on days with surplus renewables. There are many days in which no thermal capacity is used, but there are also numerous days in all seasons, especially in winter, that require significant use of thermal capacity. Imports are even more sporadic than in 2035, and while it is clear that transmission lines are utilized extensively, net imports over the course of the year have actually shrunk because power is flowing in more equal quantities in both directions. In the next section we will examine transmission in greater detail.

5.4.4 Transmission and distribution

This study analyzed the role of, and impacts on, the transmission and distribution (T&D) system in the process of deep decarbonization. Four categories of T&D were considered:

- New inter-regional transmission between states, or between Canada and the US: This transmission is solved for explicitly in RIO as part of the capacity expansion modeling and is co-optimized with other supply- and demand-side resources.
- Distribution circuit upgrades (residential, commercial, industrial) within each zone: Simultaneous peak load by customer class was calculated, and the distribution revenue requirement for each class was scaled according to peak load growth.
- Transmission upgrades within each state, treated separately from lines between states (for example, new transmission into Boston from other part of Massachusetts). The simultaneous gross load peak in each state is pegged to the current revenue requirement, and scaled with peak load growth. It is assumed to be additive with new inter-regional transmission.
- Renewable interconnections and spur lines to connect solar and wind to load: New lines to connect renewables to load or the nearest available transmission. This category includes lines to connect offshore wind.

The latter two categories (in-state bulk transmission and spur lines) are not explicitly addressed in this section, but are included in the cost estimates in Section 5.6. The first two categories are examined in more detail below.

5.4.4.1 Inter-regional transmission

New inter-regional transmission was a critical part of all pathways because of its importance as a balancing strategy in high renewables systems. Its value stems from three factors: weather diversity across zones, complementary resource endowments, and the flexibility of the Quebec hydro system. Figure 54 in the technical supplement shows a map of the transmission lines modeled in RIO and contrasts the 2050 transmission capacity in six pathways, including the reference case. In all pathways, the transmission paths from Quebec to New York, and from Quebec to Massachusetts, had significant new capacity build. In the No Thermal pathway and the Regional Coordination pathway, significant new capacity was also built from New York to PJM. Beyond these major transmission paths, numerous smaller upgrades were made within New England and between New England and New York. Table 8 shows the cumulative transmission build in each of the studied transmission paths. The net-zero scenarios with the highest total regional transmission build are on the left side of the table, and those with the lowest total build are on the right side. Massachusetts does not always follow the regional trends. The highest builds occurred in the No Thermal, Regional Coordination, and

6.4 Electricity balancing

In the pathways studied, nearly all electricity not supplied by nuclear generation or imports comes from non-dispatchable, variable renewable generation. Gas generation plays a critical reliability role in such a system, but its contribution to total annual energy production is small. These changes represent a fundamental shift in the planning and operation of power systems, and the implications warrant further discussion.

One important conclusion is that the procurement of capacity (MW) and energy (MWh) are fundamentally separate in decarbonized energy systems. The most resource-constrained days (for example, see the February 16th hourly profile in Figure 28) look nothing like the average day (see Figure 25). The average day indicates the requirements for renewable procurement and meeting the carbon emissions target, which are primarily about energy. The resource-constrained day, on the other hand, indicates the requirements for storage, transmission, and thermal power plants, which are primarily about capacity.

For evaluating the operational impacts of high variable generation on the electricity system, it is instructive to consider the temporal and spatial dimensions of different aspects of the balancing problem shown in

Figure 41. The solution to any one of the challenges shown must be specific to its location on the system (described in terms of voltage level) and the timescale over which the challenge manifests. Thought about in this way, it is clear that there are no silver bullet solutions that address all the challenges raised by variable generation; instead, what is required is a collection of different measures that work in concert. A subset of these, including thermal generation, storage, flexible load, transmission, and curtailment, are shown in Figure 27.

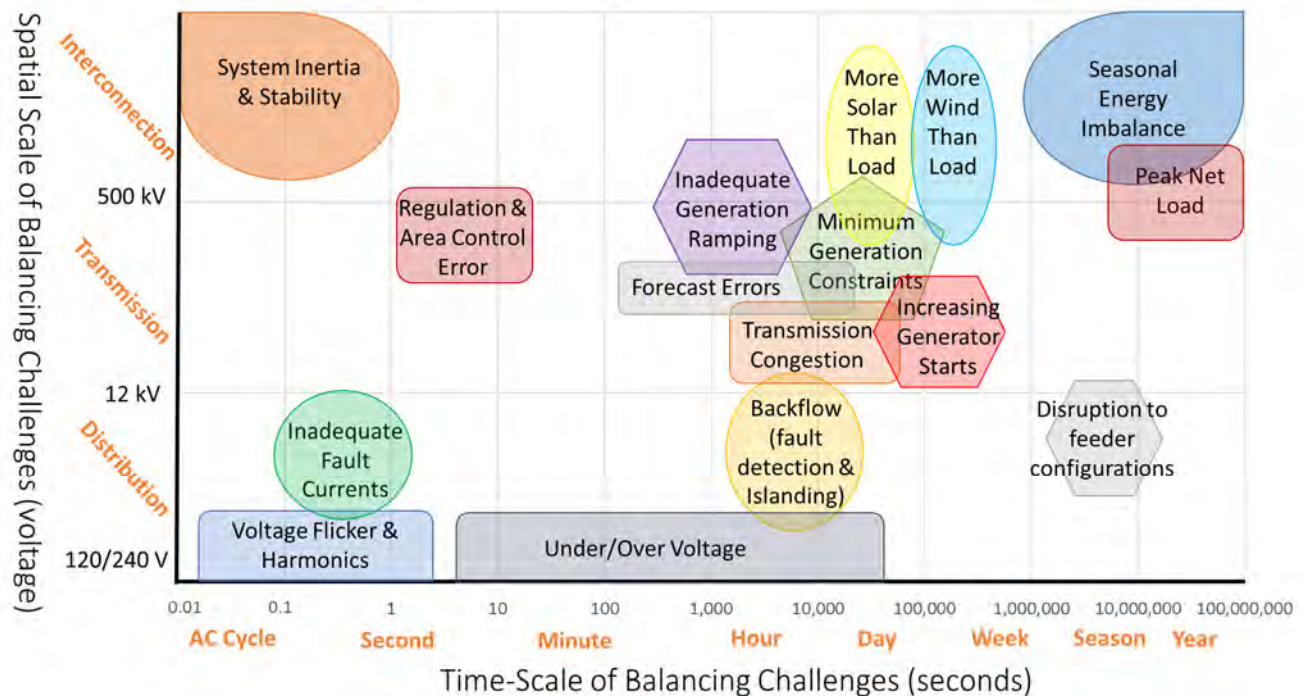
This study has not addressed balancing challenges that occur either at the sub-hourly time scale or on geographic scales smaller than New England states. As noted elsewhere, local electricity storage could play an important role in addressing both sub-state and sub-hourly balancing challenges. Pathways such as the DER Breakthrough, with a high rooftop PV build, may create challenges for distribution systems. Some of these challenges could be addressed through flexible load operation, and others could be addressed by the same upgrades that will already be required to meet new electrification loads, but these aspects were not explored in this report.

The Northeast region presents a unique set of challenges and opportunities when it comes to renewable balancing. The region has large offshore wind potential that is anticipated to have a low levelized cost of energy, but simulated wind datasets show that offshore wind can drop to near zero in any month and remain at low levels of output for long stretches.⁷⁰ Across all pathways, the challenges posed by wind variability are made manageable, in part through gas generation and in part through operational coordination with Hydro Quebec, which has over 100 TWh of energy stored behind dams in Quebec, and the ability to shift energy on a seasonal time scale. This study's results are in full agreement with previous studies that highlight the mutual benefits of transborder electricity trade. However, operational coordination involves more than the single issue of trade with Quebec; it also encompasses greater coordination with New York, and between different ISO-NE regions. For example, this study's results show clear patterns of resource specialization within ISO-NE—Massachusetts building offshore wind while Vermont and New Hampshire build solar, with mutually beneficial

⁷⁰ The NREL wind toolkit shows offshore wind in Massachusetts dropping below 5% for six consecutive days in August 2012.

trade among them taking advantage of resource diversity. This dynamic among others represents a new operational paradigm in the region, and with it come challenges that go beyond a mere tabulating of the transmission and generating technologies that must be built. The next section discusses electricity markets, just one of the institutional barriers that ahead on the path to Net Zero.

Figure 41. The challenges that can arise in balancing high variable generation (wind & solar) systems are numerous. Most have been extensively studied, with technical solutions existing for each. However, the associated costs are uncertain and no power systems the size of ISO-NE have yet achieved renewable penetrations that match those envisioned in this study. Figure credit: Evolved Energy Research



6.5 Electricity markets

The rapid decarbonization of the New England electricity system envisaged in this report points to the need for major changes in ISO-NE electricity markets, quite distinct from whatever changes are required in engineering and operating procedures to support a high renewables electricity system. We described the basic issues in previous work,⁷¹ which is summarized here in abridged form. The need for changes in electricity markets stems from the fact that electricity markets were originally designed under a paradigm in which most generators were assumed to be dispatchable and to have a non-zero marginal cost, and in which load was passive and far more difficult and costly to control than supply. These assumptions are almost entirely flipped on their heads in a high renewables system, giving rise to a new market paradigm in which almost all costs are fixed, supply itself is variable, and new technology enables demand-side flexibility.

The first key market challenge is how to keep the necessary level of thermal generators in the system. This report highlights the role of thermal generation in a future ISO-NE system with high penetrations of wind and solar (discussed in Sections 5.4.3 and 6.1.2). Thermal generating plants are needed for reliability in a lowest-

⁷¹ Jones, et al. 2019, IEEE Power & Energy Magazine, Electrification and the Future of Electricity Markets, <https://www.evolved.energy/post/2018/07/18/future-of-electricity-markets>

Figure 53 ISO-NE installed capacity by year across pathways.

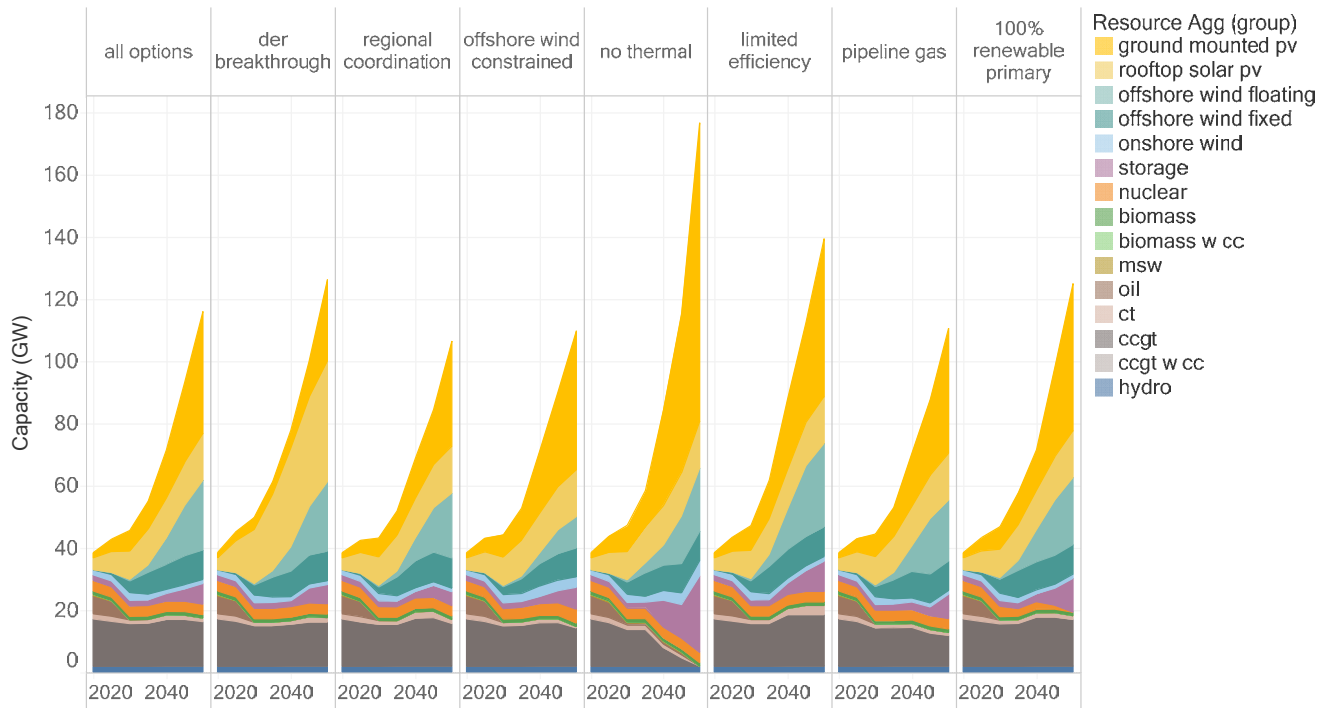


Figure 54 Electricity supply in the Offshore Wind Constrained pathway for each zone in the Northeast.

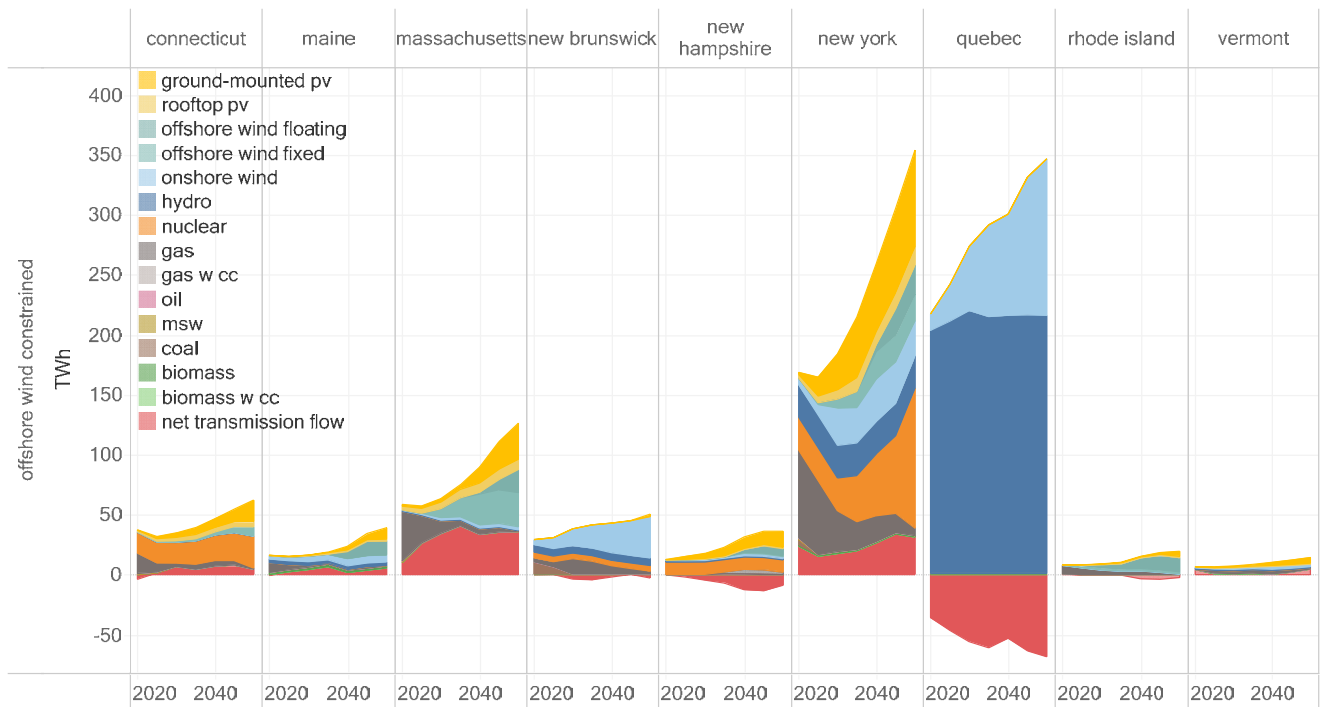
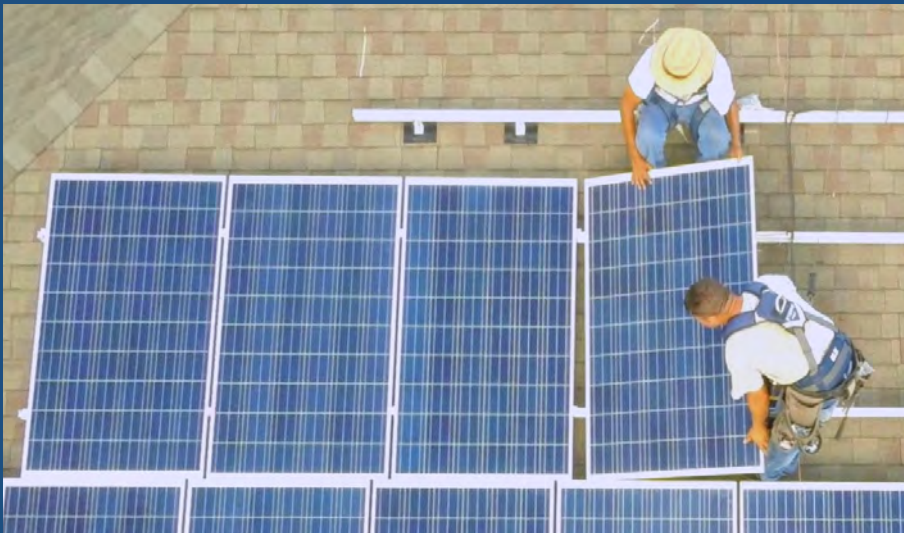


EXHIBIT 8





Prepared in accordance with
Section 16a-3a of the Connecticut
General Statutes



Integrated Resources Plan

Pathways to achieve a
100% zero carbon
electric sector by 2040

OCTOBER 2021

**Connecticut Department of Energy and
Environmental Protection**

Table of Contents

| | |
|---|------------|
| Takeaways for Policymakers..... | 5 |
| Executive Summary | 6 |
| Stakeholder Engagement for the IRP | 12 |
| Part I: Objectives of the IRP | 15 |
| Introduction..... | 15 |
| Objective 1: Decarbonizing the Electricity Sector | 17 |
| Zero Carbon Pathways Modeling Methodology | 22 |
| Setting the Regional Emissions Target | 22 |
| Determining What Counts towards Connecticut’s 100% Zero Carbon Target..... | 25 |
| The Scenarios Tested in the Model..... | 26 |
| Modeling Assumptions | 27 |
| Reference Scenario | 28 |
| Zero Carbon Policy Scenarios Results | 33 |
| Key Findings | 33 |
| Balanced Blend Scenarios | 36 |
| Millstone Extension Scenarios | 45 |
| BTM Solar PV Emphasis Scenarios | 53 |
| No Transmission Constraint Scenarios..... | 61 |
| Reliability Modeling | 68 |
| Strategies to Achieve Objective 1..... | 69 |
| Objective 2: Securing the Benefits of Competition & Minimizing Ratepayer Risk..... | 73 |
| Connecticut’s Aims for Restructuring | 73 |
| The Regulatory Framework: Before and After Deregulation..... | 74 |
| New England’s Electricity Markets: The Early Years | 76 |
| The Mandatory Capacity Market Construct..... | 77 |
| Conflict between State Policies and ISO-NE Markets | 79 |
| Connecticut’s Environmental and Clean Energy Policies | 79 |
| ISO-NE Market Design Changes | 81 |
| ISO-New England’s Market Design Has Driven Overreliance on Natural Gas | 83 |
| Securing the Benefits of Competition in State Jurisdictional Markets | 88 |
| Connecticut’s Renewable Portfolio Standard | 88 |
| Competitive Procurements for Grid-Scale Renewable Resources..... | 88 |
| Distributed Renewable Resource Programs..... | 93 |
| Valuing Distributed Renewable Resources | 98 |
| FERC Order 2222 | 102 |
| Issues Affecting Connecticut’s Renewable Portfolio Standard | 102 |
| Disposition of Contracted Renewable Energy Credits | 102 |
| Impact of BTM Resources on RPS Compliance Obligation | 104 |

Strategies to Achieve Objective 2..... 104

Objective 3: Ensuring Energy Affordability and Equity for all Ratepayers 106

Energy Affordability 106

 Impacts on Transmission Affordability108

 Connecticut’s Energy Affordability Gap109

 Energy Equity110

Strategies to Achieve Objective 3..... 112

Objective 4: Optimal Siting of Generation Resources 117

Siting of Large Fossil-Fueled Power Generation in Connecticut 117

 Estimated Effects of a Carbon Tax on In-State Electric Generation123

Siting of Zero Carbon Power Generation 124

 Solar Siting in Connecticut125

 Offshore Wind Siting126

 Hydroelectric Imports Siting128

 Equitable Siting and Development128

Strategies to Achieve Objective 4..... 129

Objective 5: Upgrade the Grid to Support and Integrate Variable and Distributed Energy Resources 131

The New England Regional Transmission Grid 131

Unlocking Clean Energy Resources 132

Reducing Curtailment through Transmission Upgrades..... 135

Transmission Upgrade Planning Needs to Begin Now 138

Load Reduction and Balancing through Energy Efficiency, Demand Response, and Storage 139

 Energy Efficiency139

 Demand Response and Energy Storage146

Ensuring Grid Security 151

 Weather-Based Threats151

 Cybersecurity Threats152

 Increasing Storm Resiliency154

Strategies to Achieve Objective 5..... 156

Objective 6: Balancing Decarbonization and Other Public Policy Goals 158

Waste-to-Energy Facilities 158

Anaerobic Digestion Facilities 162

Biomass and Landfill Methane Gas Facilities 163

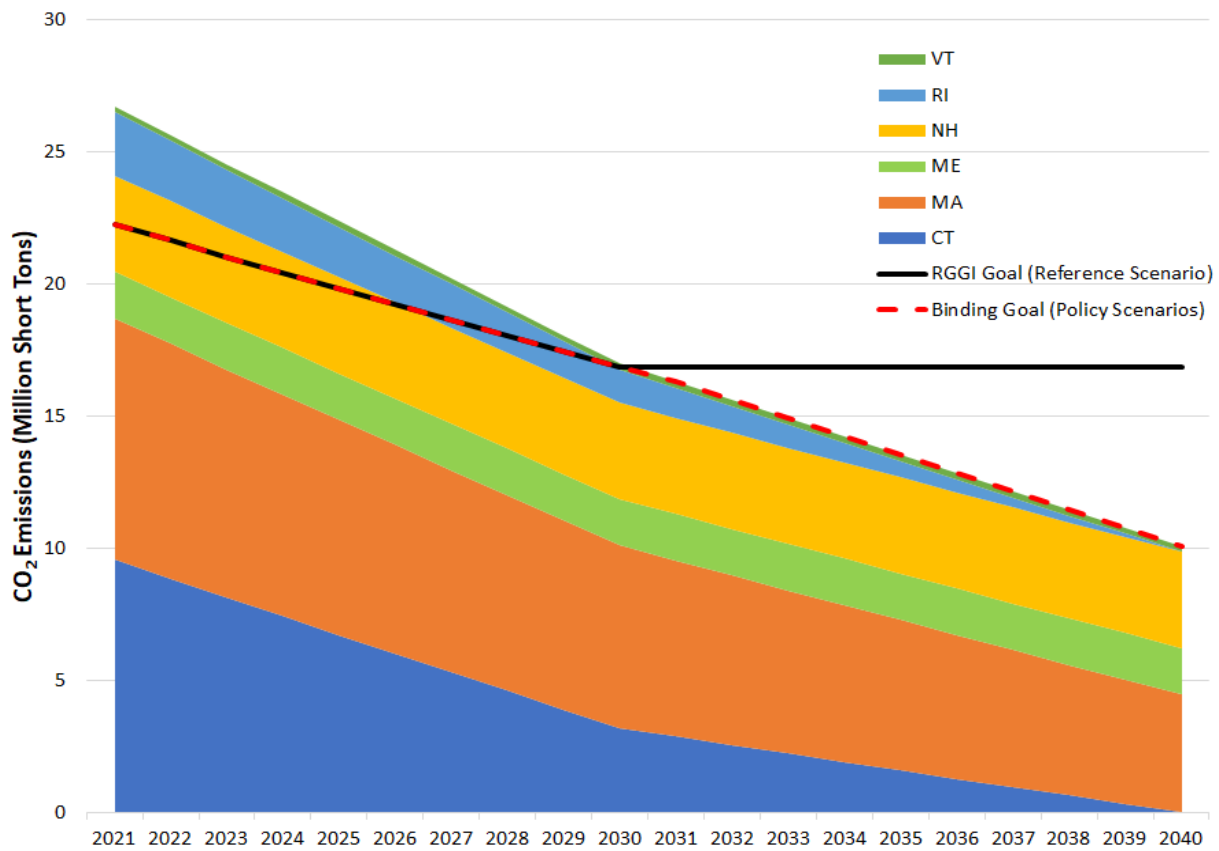
Strategies to Achieve Objective 6..... 167

Part II: Strategies..... 168

| | |
|---|-------------------|
| 1. Establish the 100% Zero Carbon Electric Supply Target as the Policy Goal of Connecticut | 168 |
| 2. Pursue Reform of Wholesale Electricity Markets..... | 171 |
| 3. Reform Governance Structure Surrounding ISO-New England Markets..... | 172 |
| 4. Coordinate with regional states on evaluating transmission needs to meet state climate and energy policy goals..... | 174 |
| 5. Monitor Conditions to Determine When to Conduct New Grid-Scale Renewable Procurements, including Offshore Wind..... | 175 |
| Millstone | 175 |
| Deployment of Existing Contracted Resources..... | 177 |
| Pace of Electrification of Thermal and Buildings Sectors..... | 177 |
| Procurement-to-In-Service Lead Times | 177 |
| Declining Technology Costs | 178 |
| Availability of Transmission Resources | 178 |
| Aligning Procurements with Other States | 179 |
| Class I Renewable Energy Procurement Schedule | 180 |
| 6. Structure the successor tariff programs supporting distributed generation to achieve historic deployment levels and equitably distribute the benefits of zero carbon generation | 181 |
| 7. Investigate whether it is in the best interest of ratepayers to retain RECs procured by the EDCs on behalf of all ratepayers to meet our State climate goals | 184 |
| 8. Address the impact behind-the-meter resources have on reducing overall RPS compliance obligations..... | 185 |
| 9. Engage in coordinated planning for workforce and economic development..... | 186 |
| 10. Conduct a stakeholder process to improve the transparency, predictability, and efficiency of solar siting and permitting in Connecticut | 187 |
| 11. Leverage Regional Coordination to Develop Best Practices for Offshore Wind Siting..... | 188 |
| 12. Invest in the expanded deployment of cost-effective energy efficiency and active demand response..... | 188 |
| 13. Support the development of energy storage resources that can support the reliable integration of variable renewables and avoid fossil peaking generation. | 190 |
| 14. Phase down the value of biomass RECs eligible as a Class I renewable energy source to diversify the resources supported by Connecticut’s Renewable Portfolio Standard | 191 |
| 15. Diversify the state’s materials management infrastructure through investment in more sustainable materials management strategies and facilities | 192 |
| 16. Expand Microgrid and Resilience Grant and Loan Pilot Program | 193 |
| <i>Part III: Analysis and Recommendations Concerning a Connecticut Portfolio Standard for Thermal Energy</i> | <i>194</i> |
| Introduction..... | 194 |

| | |
|---|------------|
| Biodiesel as a thermal decarbonization strategy | 197 |
| Nitrogen Oxide (NOx) Emissions | 198 |
| GHG Benefits and Lifecycle Assessment | 199 |
| Perpetuation of Fossil Fuel Use | 201 |
| Standards | 201 |
| Other Air-Quality Parameters | 202 |
| Thermal RPS as a vehicle for thermal decarbonization | 203 |
| Conclusion | 205 |

Figure 1.1: Annual ISO-NE CO₂ Emissions Comparison, Base Load Scenarios



Additionally, the model was required to meet long-term resource adequacy (reliability) requirements. This means that, given current technology, the model retained some fossil generation to ensure that there are enough resources that can quickly produce power during periods of extreme peak demand in the region, or if a resource suddenly goes offline.

The model also calculates the present value of all existing resources and determines which existing generators would be likely to shut down, or retire, based on differential costs and benefits through 2040. The model runs until it produces a balanced solution of new generating resource additions and retirements, taking into account electric system needs, including reliability, and ratepayer cost. Each time the model is run, it refines the set of new resource options and retirements it places into the system and tracks their economic performance based on anticipated market prices resulting from which resources are selected in the model run. Specifics about projected resource costs are included in Appendix A1. At the end of each run, the model decides how to adjust the current set of new builds and retirements until the model selects an optimal solution. Because Connecticut is part of the New England regional electricity market, forcing the model to retire all of Connecticut’s in-state fossil generation would ultimately not achieve the outcomes desired by such a policy. The reality is that, under the current market structure, if Connecticut were to force the closure of all in-state fossil plants the result would likely be that more expensive, dirtier fossil plants in other states would fill in the gap, exporting their power to consumers in Connecticut. Thus, while emissions from plants located in Connecticut would go down, regional emissions would increase significantly, which is not a



desirable outcome, particularly because climate change is a global problem. The Department has determined that the balance of interests supports allowing the model to retire the most uneconomic and dirtiest plants throughout New England towards meeting the aggregate emissions reductions goals of the New England states, including the 100% Zero Carbon Target assumed for Connecticut. This approach is currently consistent with that of policies developing in other states. As of July 2021, nearly all of the states with 100% zero or net-zero carbon electricity supply statutory goals focus their goals on the GHG emissions of electricity sold to ratepayers, not energy generated in the state.³²

Elsewhere in this IRP, however, the Department identifies strategies for reducing emissions from in-state fossil generation, which contributes to air quality impacts that disproportionately harm many environmental justice communities. These include market reforms (discussed in Objective 2), placing a carbon tax on in-state generation (discussed in Objective 4), advancing technology in energy storage and hydrogen production (discussed in Objective 5), and continued refinement of modeling assumptions.

Determining What Counts towards Connecticut's 100% Zero Carbon Target

Another important assumption used in the modeling exercise is what types of resources “count” towards compliance with the 100% Zero Carbon Target. For the purpose of this IRP, DEEP took a multi-step approach—which can be described as a simplified consumption-based emissions accounting method—to determine what emissions should be “assigned” (i.e. credited to Connecticut) towards meeting the 100% Zero Carbon Target.³³

First, the emissions profile from any zero carbon resources that have already been, or would need to be, procured by Connecticut under long-term contracts funded by Connecticut ratepayers to meet the 100% Zero Carbon Target are assigned to the State. This assignment is made even though any RECs associated with those contracts may be either retained or sold by the EDCs under current practice. Using this GHG consumption-based inventory for the electric sector, the IRP identified the percent of Connecticut's electricity consumption that will be carbon-free over the Reference scenario study period.

After the emission profiles from these contracted resources are assigned to Connecticut's load, the emissions from the remaining “unassigned” resources across the region are totaled, and the model assigns each state a share of those emissions proportional to the state's electricity consumption, or load. Connecticut's load share of those emissions from “unassigned” resources in the region is applied to the remaining load needed to be met in Connecticut. To account for the fossil fuel resources needed for reliability purposes in 2040, additional clean energy is brought online and attributed to Connecticut in the IRP modeling to meet the 100% Zero Carbon Target as required by EO3. It is important to note that the modeling selects specific types of resource additions (technologies) needed each year to maintain progress towards the Regional Emissions Goal based on reliability and projected cost optimization, as described above. The resulting assignments of these selected resources to Connecticut in each year should be interpreted as the quantity of zero carbon energy the State would need to procure based on those resource cost projections. Any procurements DEEP conducts for resources based on the findings of

³² The states referenced in this statement currently include Arizona, California, Hawaii, Maine, New Mexico, New York, Nevada, Oregon, Virginia, Vermont, and Washington.

³³ As defined in DEEP's *2017 Greenhouse Gas Emissions Inventory*, “a consumption-based approach calculates emissions based on Connecticut's share of electricity consumption in New England, using the emissions profile of the regional electric grid's generation fuel mix.” https://portal.ct.gov/-/media/DEEP/climatechange/2017_GHG_Inventory/2017_GHG_Inventory.pdf

this IRP to meet the 100% Zero Carbon Target would open to all zero carbon Class I resources, consistent with past grid-scale procurements conducted by the State.

An overview of the modeling results for each scenario is presented below in this Objective, with more detailed modeling results included in Appendix A3.



The Scenarios Tested in the Model

For the IRP, DEEP tested five scenarios, including a “business-as-usual” Reference scenario which meets the existing regional emissions reduction target established by RGGI, plus four scenarios which use different resource portfolios to meet the Regional Emissions Target (including the 100% Zero Carbon Target) by 2040. Each of the five scenarios is evaluated against two different forecasts of electricity consumption trends:

- in the “Base” case, electricity consumption continues on the existing trajectory based on current energy policies and primarily relies on the ISO-NE 2019 Capacity, Energy, Loads and Transmission (CELT) Forecast;³⁴
- in the other “Electrification” case, the deployment of electric vehicles and building heating technology are assumed to triple by 2040, increasing electricity consumption by 18,800 GWh in 2040 relative to the base case.³⁵

Additional information on the assumptions used to develop the load cases can be found in Appendix A1. In each of the scenarios, the model selects different quantities of zero-emission resources to meet the Regional Emissions Target, including the 100% Zero Carbon Target for Connecticut, with the goal of minimizing associated costs. The zero-emission resource types selected include:



- offshore wind (OSW),
- land-based wind (LBW),
- grid-scale solar photovoltaics (PV),
- nuclear generation,
- hydroelectricity imported from Canada, and
- grid-scale battery storage.

The model also relied on some fossil-fueled generation and imports from New York and Canada over existing transmission tie lines to meet the reliability requirements of the region, without exceeding the applicable Regional Emissions Target for each scenario. The ten resulting scenarios are summarized by Table 1.1 below.

³⁴ Each year, ISO New England prepares a projected forecast of the next 10 years’ annual capacity, energy demand, loads, and transmission needs. This is used in power systems planning and reliability studies. These studies are all accessible at <https://www.iso-ne.com/system-planning/system-plans-studies/celt/>

³⁵ The purpose of the Electrification load case is to begin planning and modeling resource needs under a future with significantly higher forecasted electricity demand. The assumptions used to develop this load case are not policy recommendations but were influenced by policy recommendations from other statutory reports produced by DEEP, the Governor’s Council on Climate Change, and regional efforts. Electrification assumptions were based on what was known and knowable at the time of modeling and are subject to change with continued planning, modeling, and research. Detailed discussion on these assumptions is available in Appendix A1.

Appendix A3. Results

1 Capacity Expansion

As explained in Appendix 1, Aurora’s long-term capacity expansion function was used to determine economic resource additions and retirements over the IRP planning horizon over and above known resource additions and retirements. The following charts reflect the resource balance after accounting for both scheduled and economic resource additions and retirements.

Figure 1 and Figure 2 provide an overview of total nameplate capacity by fuel type in 2040, the final year of the study period. The final resource mix for each scenario reflects the various retirements and additions resulting from the scenario capacity expansion. All Electrification load scenarios resulted in fewer retirements and increased OSW build out due to the higher load relative to the counterpart scenarios under the Base load case. As shown in Section 4.1, fossil generation declines over time, but capacity is still needed to meet resource adequacy needs.

Figure 1: 2040 Regional Capacity by Fuel Type, Base Load Scenarios

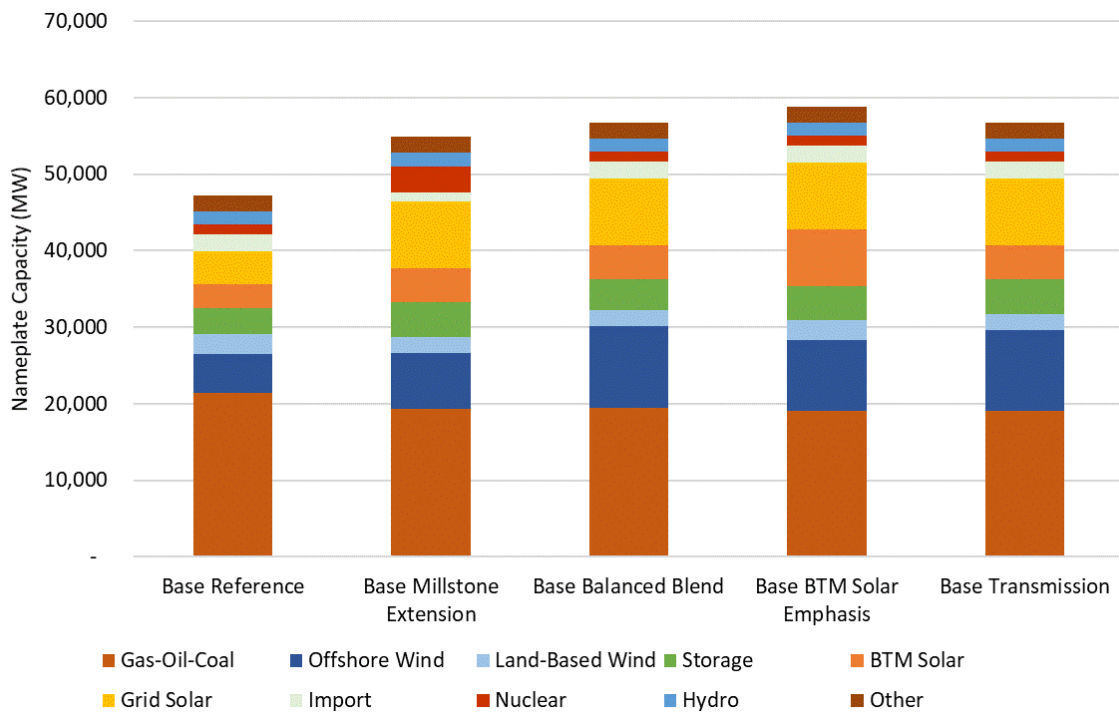
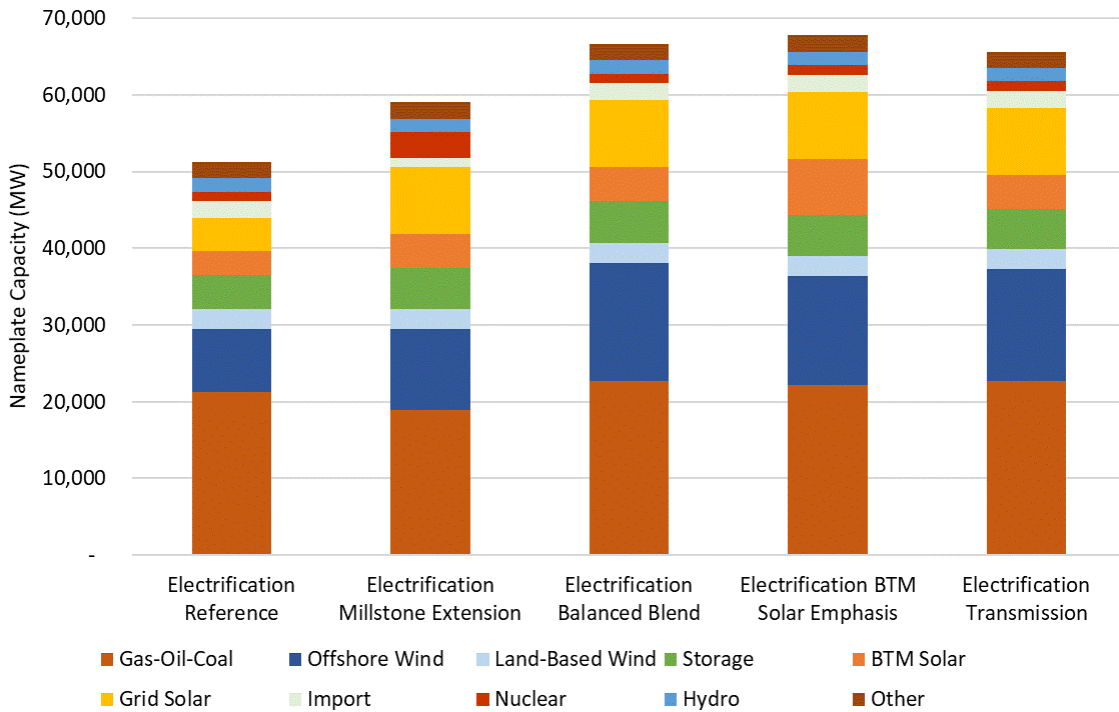


Figure 2: 2040 Regional Capacity by Fuel Type, Electrification Load Scenarios



The change in capacity over the study period is shown for all Base load scenarios in Figure 3 and for all Electrification load scenarios in Figure 4. Additions for each scenario are broken out by technology type. Retirements are shown in the aggregate. More detail on technology-specific retirements is shown in Figure 5 and Figure 6.

BTM Solar and import additions are identical for the two load cases across each resource case. In contrast, energy efficiency additions are varied across the two load cases but are held constant for the five scenarios. As previously noted, the largest disparities across load cases include higher levels of additions in scenarios under the Electrification load case, particularly OSW additions, and lower levels of retirements for Electrification load scenarios. Increasing planning reserve requirements in the Electrification load scenarios required that the capacity expansion built additional battery storage and reduced retirements relative to the corresponding Base load scenarios.

EXHIBIT 9





February 26, 2021

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: ISO New England Inc., Docket No. ER21-____-000
Forward Capacity Auction Results Filing
April 12, 2021 COMMENT DATE REQUIRED BY REGULATION

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”)¹ and Section III.13.8.2 of the ISO New England Transmission, Markets and Services Tariff (the “Tariff”),² ISO New England Inc. (the “ISO”) submits this Forward Capacity Auction Results Filing (“FCA Results Filing”) for the fifteenth Forward Capacity Auction (“FCA”).³ Section III.13.8.2 (a) of the Tariff requires the ISO to file the results of the FCA with the Federal Energy Regulatory Commission (“Commission” or “FERC”) as soon as practicable after the FCA is complete. The fifteenth FCA was held on February 8, 2021 for the June 1, 2024 through May 31, 2025 Capacity Commitment Period. The ISO submits this filing in accordance with the Tariff.

Pursuant to Section III.13.8.2 (c) of the Tariff, any objection to the FCA results must be filed with the Commission within 45 days from the date of the FCA Results Filing. **Accordingly, any objections must be filed on or before April 12, 2021, and the ISO requests that the Commission issue a notice setting an April 12, 2021 comment date.** As discussed below, the ISO requests an effective date of June 26, 2021, which is 120 days from the date of this submission.

In accordance with Section III.13.8.2 of the Tariff, this submission contains the results of the fifteenth FCA, including the Capacity Zones in the auction; the Capacity Clearing Price in each of those Capacity Zones; a list of which resources received Capacity Supply Obligations in each Capacity Zone; and the amount of those Capacity Supply

¹ 16 U.S.C. § 824d.

² The rules governing the Forward Capacity Market (“FCM Rules”) are primarily contained in Section III.13 of the Tariff, but also may include other provisions, including portions of Section III.12.

³ Capitalized terms used but not defined in this filing are intended to have the meaning given to such terms in the Tariff.

Obligations.⁴ Pursuant to Section III.12.4 of the Tariff, the Capacity Zones for the fifteenth FCA were the Southeast New England Capacity Zone (“SENE”), the Northern New England Capacity Zone (“NNE”), the Maine Capacity Zone (“Maine”) and the Rest-of-Pool (“ROP”) Capacity Zone. The SENE Capacity Zone included the Southeastern Massachusetts, Rhode Island and Northeastern Massachusetts/Boston energy load zones. The SENE Capacity Zone was modeled as an import-constrained Capacity Zone. The NNE Capacity Zone included the New Hampshire, Vermont, and Maine Load Zones. NNE was modeled as an export-constrained Capacity Zone. The Maine Load Zone was modeled as a separate nested export-constrained Capacity Zone within NNE. The ROP Capacity Zone included the Connecticut and Western/Central Massachusetts Load Zones.

Section III.13.8.2 (b) of the Tariff requires the ISO to provide documentation regarding the competitiveness of the FCA. The documentation may include certification from the auctioneer and the ISO that: (i) all resources offering and bidding in the FCA were properly qualified in accordance with the provisions of Section III.13.1; and (ii) the FCA was conducted in accordance with the provisions of Section III.13. To meet the requirement of Section III.13.8.2 (b) of the Tariff, the ISO has included the Testimony of Robert G. Ethier, Vice President of System Planning at the ISO (“Ethier Testimony”); the Testimony of Alan McBride, Director of Transmission Services and Resource Qualification at the ISO (“McBride Testimony”); and the Testimony of Lawrence M. Ausubel, the auctioneer (“Ausubel Testimony”).

The ISO tenders the instant filing in compliance with Section III.13.8.2 of its Tariff pursuant to Section 205 of the FPA, and the ISO requests that the Commission find that the ISO conducted the fifteenth FCA in accordance with its FERC-approved Tariff.

I. COMMUNICATIONS

All correspondence and communications in this proceeding should be addressed to the undersigned as follows:

⁴ Section III.13.8.2 of the Tariff requires the ISO to include in the FCA Results Filing the substitution auction clearing prices and the total amount of payments associated with any demand bids cleared at a substitution auction clearing price above their demand bid prices. However, as explained below and in the Ethier Testimony, the substitution auction was not conducted in the fifteenth FCA because there were no active demand bids. For that reason, this FCA Results Filing does not include substitution auction clearing prices or total amount of payments associated with any demand bids cleared at a substitution auction clearing price above their demand bid prices.

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II. STANDARD OF REVIEW

The ISO tenders the instant filing in compliance with Section III.13.8.2 of its Tariff and pursuant to Section 205 of the FPA.⁵ The ISO respectfully requests that the Commission find that the fifteenth FCA Results Filing meets the standard of Section 205, in that the results are just and reasonable rates derived from the auction that was conducted in accordance with the ISO's FERC-approved Tariff.

III. REQUESTED EFFECTIVE DATE

The ISO respectfully requests that the Commission accept the fifteenth FCA Results Filing, confirming that the auction was conducted in conformance with the ISO's Commission-approved Tariff, to be effective June 26, 2021, which is 120 days after the date of submission. Under the Tariff, parties have 45 days to file with the Commission an objection to the FCA Results Filing.⁶ An effective date of 120 days from the date of submission gives interested parties an opportunity to respond to any objections and provides the Commission time to review the FCA Results Filing and associated pleadings.

IV. SPECIFIC FCA RESULTS

A. Capacity Zones Resulting from the Auction

Section III.13.8.2 (a) of the Tariff requires the ISO to provide the Capacity Zones resulting from the FCA. The Capacity Zones for the fifteenth FCA were SENE, NNE, Maine, and ROP. The Capacity Zones determined under Section III.13.2.3.4 of the Tariff are the same Capacity Zones that were modeled pursuant to Section III.12.4 of the Tariff.

⁵ It should be noted that the Commission has consistently held that the matters that may properly be in dispute in the annual FCA results filing are the results of the FCA and not the underlying market design or rules. *See, e.g., ISO New England Inc.*, 130 FERC ¶ 61,145 at P 33 (2010) (finding that challenges to the Forward Capacity Market ("FCM") market design are outside the scope of the proceeding evaluating the FCA results filing).

⁶ Tariff Section III.13.8.2 (c).

B. Capacity Clearing Prices

The Tariff requires the ISO to provide the Capacity Clearing Price in each Capacity Zone (and, pursuant to Section III.13.2.3.3 (d), the Capacity Clearing Price associated with certain imports, if applicable).⁷ For the fifteenth FCA, the descending clock auction starting price in each Capacity Zone was \$13.932/kW-month. As explained in the Ethier Testimony, the auction resulted in the Capacity Clearing Price of \$3.980/kW-month for the SENE Capacity Zone, \$2.477/kW-month for NNE and Maine Capacity Zones, and \$2.611/kW-month for the ROP Capacity Zone.⁸

Imports over the New York AC Ties external interface, totaling 684.059 MW, imports over the Hydro-Quebec Highgate external interface, totaling 60.000 MW, imports over the New Brunswick external interface, totaling 226.000 MW, and imports over the Phase I/II HQ Excess external interface, totaling 517.000 MW, will also receive a Capacity Clearing Price. The New York AC Ties and Phase I/II HQ Excess will receive \$2.611/kW-month. Hydro-Quebec Highgate and New Brunswick will receive \$2.477/kw-month.

C. Substitution Auction Clearing Prices and Total Amount of Payments Associated with any Demand Bids Cleared at a Substitution Auction Clearing Price Above Their Demand Bid Prices

Section III.13.8.2 (a) of the Tariff requires the ISO to provide the clearing prices and total amount of payments associated with any demand bids cleared at the substitution auction clearing price above their demand bid prices. In the fifteenth FCA, there were no active demand bids for the substitution auction and, accordingly, the substitution auction was not conducted.

D. Capacity Supply Obligations

The Tariff requires the ISO to specify in the FCA Results Filing the resources that received Capacity Supply Obligations in each Capacity Zone.⁹ This information is provided in Attachment A.

The Tariff also requires the ISO to list which resources cleared as Conditional Qualified New Generating Capacity Resources and to provide certain information relating to Long Lead Time Facilities.¹⁰ No resources cleared as Conditional Qualified New Generating Capacity Resources in the fifteenth FCA. In addition, there were no Long Lead Time Facilities that secured a Queue

⁷ Tariff Section III.13.8.2 (a).

⁸ Ethier Testimony at 8-13.

⁹ Tariff Section III.13.8.2 (a).

¹⁰ *Id.*

Position to participate as a New Generating Capacity Resource in the fifteenth FCA; as such, there were no resources with a lower queue priority that were selected in the FCA subject to a Long Lead Time Facility with a higher queue priority.

E. De-List Bids Reviewed for Reliability Purposes

Prior to the fifteenth FCA, pursuant to Section III.13.2.5.2.5 of the Tariff, the ISO reviewed each submitted Retirement De-List Bid, Permanent De-List Bid, and Static De-List Bid¹¹ to determine if the capacity associated with each such bid was needed for reliability reasons. During the FCA, also pursuant to Section III.13.2.5.2.5, the ISO reviewed a sufficient quantity of Dynamic De-List Bids associated with reaching the Capacity Clearing Price to determine if the capacity associated with each such bid was needed for reliability reasons. The capacity is deemed to be needed for reliability reasons if a violation of any North American Electric Reliability Corporation, Northeast Power Coordinating Council, or ISO criteria would occur in the absence of the capacity. The ISO's review of de-list bids considered the availability of all existing supply resources in the FCM, including Demand Capacity Resources. The ISO's process for performing the reliability review of de-list bids pursuant to Section III.13.2.5.2.5 of the Tariff is described in that provision, and in Section 7 of ISO New England Planning Procedure No. 10 — Planning Procedure to Support the Forward Capacity Market.

Section III.13.8.2 (a) of the Tariff requires that, in the FCA Results Filing, the ISO enumerate de-list bids rejected for reliability reasons pursuant to Section III.13.2.5.2.5, and the reasons for those rejections. As explained in the McBride Testimony, in the fifteenth FCA, the ISO did not reject any bids for reliability reasons pursuant to Section III.13.2.5.2.5 of the Tariff.

V. DOCUMENTATION REQUIRED PURSUANT TO SECTION III.13.8.2 (b) OF THE TARIFF

Section III.13.8.2 (b) of the Tariff requires the ISO to provide documentation regarding the competitiveness of the FCA, and states that the documentation may include certification from the auctioneer and the ISO that: (i) all resources offering and bidding in the FCA were properly qualified in accordance with the provisions of Section III.13.1 of the Tariff; and (ii) the FCA was conducted in accordance with the provisions of Section III.13 of the Tariff. In this regard, the ISO has included the Ethier Testimony, the McBride Testimony, and the Ausubel Testimony.

¹¹ No Export De-List Bids or Administrative Export De-List Bids were submitted for the fifteenth FCA.

In his testimony, Dr. Ethier certifies that all resources offering and bidding in the fifteenth FCA were qualified in accordance with Section III.13.1 of the Tariff.¹² Dr. Ethier also explains the prices resulting from the auction and how the prices were determined.¹³

In his testimony, Mr. McBride testifies that he oversaw the reliability review of de-list bids for the fifteenth FCA pursuant to Section III.13.2.5.2.5 of the Tariff.

Dr. Ausubel, the auctioneer, and chairman and founder of Power Auctions LLC, the company that helped implement and administer the FCA, certifies that the auction was conducted in accordance with Section III.13.2 of the Tariff.¹⁴ Dr. Ausubel's certification is based on his vast experience in conducting energy auctions.

VI. ADDITIONAL SUPPORTING INFORMATION

The ISO tenders the instant filing in compliance with Section III.13.8.2 of its Tariff pursuant to Section 205 of the FPA.¹⁵ Section 35.13 of the Commission's regulations generally requires public utilities to file certain cost and other information related to an examination of cost-of-service rates.¹⁶ However, the results of the FCA are not traditional "rates" and the ISO is not a traditional investor-owned utility. Therefore, to the extent necessary, the ISO requests waiver of Section 35.13 of the Commission's regulations. Notwithstanding its request for waiver, the ISO submits the following additional information in compliance with the identified filing regulations of the Commission applicable to Section 205.

35.13(b)(1) - Materials included herewith are as follows:

- This transmittal letter;
- Attachment A: List of Capacity Supply Obligations;
- Attachment B: Testimony of Robert G. Ethier;

¹² Ethier Testimony at 2.

¹³ *Id.* at 8-13.

¹⁴ Ausubel Testimony at 4.

¹⁵ As noted above, the Commission has consistently held that the scope of the proceeding evaluating the annual FCA results filing is limited to the results of the FCA. *See e.g., ISO New England Inc.*, 130 FERC ¶ 61,145 at P 33 (2010) (finding that challenges to the FCM market design are outside the scope of the proceeding evaluating the FCA results filing).

¹⁶ 18 C.F.R. § 35.13 (2020).

- Attachment C: Testimony of Alan McBride;
- Attachment D: Testimony of Lawrence M. Ausubel; and
- Attachment E: List of governors and utility regulatory agencies in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont to which a copy of this filing has been mailed.

35.13(b)(2) - The ISO respectfully requests that the Commission accept this filing to become effective on June 26, 2021, which is 120 days after the submission of this FCA Results Filing.

35.13(b)(3) - Pursuant to Section 17.11 (e) of the Participants Agreement, Governance Participants are being served electronically rather than by paper copy. The names and addresses of the Governance Participants are posted on the ISO's website at <https://www.iso-ne.com/participate/participant-asset-listings/directory?id=1&type=committee>. An electronic copy of this transmittal letter and the accompanying materials have also been emailed to the governors and electric utility regulatory agencies for the six New England states which comprise the New England Control Area, and to the New England Conference of Public Utility Commissioners, Inc. The names and addresses of these governors and regulatory agencies are shown in Attachment E.

35.13(b)(4) - A description of the materials submitted pursuant to this filing is contained in the transmittal letter;

35.13(b)(5) - The reasons for this filing are discussed in this transmittal letter; and

35.13 (b)(7) - The ISO has no knowledge of any relevant expenses or cost of service that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

VII. CONCLUSION

In this FCA Results Filing, the ISO has presented all of the information required by the Tariff. The ISO has demonstrated that the fifteenth FCA was conducted in accordance with the Tariff, as found just and reasonable by the Commission. The ISO has specified the Capacity Zones that were used in the auction. The ISO has also provided the Capacity Clearing Price for each of the Capacity Zones and external interfaces, and it has provided a list of resources that received Capacity Supply Obligations. Finally, the ISO has provided documentation, in the form of testimony, regarding the outcome of the fifteenth FCA. Accordingly, the ISO requests that the Commission accept the results of the fifteenth FCA within 120 days of this filing.

Respectfully submitted,

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cc: Governance Participants (electronically) and entities listed in Attachment E.

Attachment A

| ID | Name | Type | Capacity Zone ID | Capacity Zone Name | State | Load Zone | Status | Jun-24 | Jul-24 | Aug-24 | Sep-24 | Oct-24 | Nov-24 | Dec-24 | Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 |
|-------|-------------|-----------|------------------|--------------------|-------|-----------|----------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| 12451 | NYPA - VT | Import | 8500 | Rest-of-Pool | | | Existing | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 14 |
| 12500 | Thomas A. | Generator | 8506 | Southeast | MA | SEMA | Existing | 105.2 | 105.2 | 105.2 | 105.2 | 105.2 | 105.2 | 105.2 | 105.2 | 105.2 | 105.2 | 105.2 | 105.2 |
| 12504 | Devon 15- | Generator | 8500 | Rest-of-Pool | CT | CT | Existing | 187.589 | 187.589 | 187.589 | 187.589 | 187.589 | 187.589 | 187.589 | 187.589 | 187.589 | 187.589 | 187.589 | 187.589 |
| 12505 | Middletow | Generator | 8500 | Rest-of-Pool | CT | CT | Existing | 187.6 | 187.6 | 187.6 | 187.6 | 187.6 | 187.6 | 187.6 | 187.6 | 187.6 | 187.6 | 187.6 | 187.6 |
| 12509 | UNH Powe | Generator | 8505 | Northern N | NH | NH | Existing | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| 12510 | Swanton G | Generator | 8505 | Northern N | VT | VT | Existing | 19.304 | 19.304 | 19.304 | 19.304 | 19.304 | 19.304 | 19.304 | 19.304 | 19.304 | 19.304 | 19.304 | 19.304 |
| 12511 | Swanton G | Generator | 8505 | Northern N | VT | VT | Existing | 19.349 | 19.349 | 19.349 | 19.349 | 19.349 | 19.349 | 19.349 | 19.349 | 19.349 | 19.349 | 19.349 | 19.349 |
| 12521 | Lowell Pow | Generator | 8500 | Rest-of-Pool | MA | WCMA | Existing | 74 | 74 | 74 | 74 | 74 | 74 | 74 | 74 | 74 | 74 | 74 | 74 |
| 12524 | Cos Cob 13 | Generator | 8500 | Rest-of-Pool | CT | CT | Existing | 36 | 36 | 36 | 36 | 36 | 36 | 36 | 36 | 36 | 36 | 36 | 36 |
| 12526 | Pierce | Generator | 8500 | Rest-of-Pool | CT | CT | Existing | 74.085 | 74.085 | 74.085 | 74.085 | 74.085 | 74.085 | 76.085 | 76.085 | 76.085 | 76.085 | 74.085 | 74.085 |
| 12530 | Sheffield W | Generator | 8505 | Northern N | VT | VT | Existing | 3.175 | 3.175 | 3.175 | 3.175 | 10.062 | 10.062 | 10.062 | 10.062 | 10.062 | 10.062 | 10.062 | 10.062 |
| 12551 | Kibby Wind | Generator | 8503 | Maine | ME | ME | Existing | 14.5 | 14.5 | 14.5 | 14.5 | 27.568 | 27.568 | 27.568 | 27.568 | 27.568 | 27.568 | 27.568 | 27.568 |
| 12564 | Waterbury | Generator | 8500 | Rest-of-Pool | CT | CT | Existing | 93.079 | 93.079 | 93.079 | 93.079 | 93.079 | 93.079 | 93.079 | 93.079 | 93.079 | 93.079 | 93.079 | 93.079 |
| 12581 | CL&P - Con | Demand | 8500 | Rest-of-Pool | CT | CT | Existing | 467.922 | 467.922 | 467.922 | 467.922 | 467.922 | 467.922 | 471.542 | 471.542 | 471.542 | 471.542 | 467.922 | 467.922 |
| 12583 | CL&P Distr | Demand | 8500 | Rest-of-Pool | CT | CT | Existing | 34.232 | 34.232 | 34.232 | 34.232 | 34.232 | 34.232 | 34.232 | 34.232 | 34.232 | 34.232 | 34.232 | 34.232 |
| 12590 | Ameresco | Demand | 8500 | Rest-of-Pool | CT | CT | Existing | 1.605 | 1.605 | 1.605 | 1.605 | 1.605 | 1.605 | 1.605 | 1.605 | 1.605 | 1.605 | 1.605 | 1.605 |
| 12597 | Cambridge | Demand | 8506 | Southeast | MA | NEMA | Existing | 0.653 | 0.653 | 0.653 | 0.653 | 0.653 | 0.653 | 0.653 | 0.653 | 0.653 | 0.653 | 0.653 | 0.653 |
| 12598 | Cambridge | Demand | 8506 | Southeast | MA | NEMA | Existing | 4.736 | 4.736 | 4.736 | 4.736 | 4.736 | 4.736 | 4.736 | 4.736 | 4.736 | 4.736 | 4.736 | 4.736 |
| 12600 | UI Conserv | Demand | 8500 | Rest-of-Pool | CT | CT | Existing | 89.081 | 89.081 | 89.081 | 89.081 | 89.081 | 89.081 | 89.081 | 89.081 | 89.081 | 89.081 | 89.081 | 89.081 |
| 12657 | Unitil COR | Demand | 8500 | Rest-of-Pool | MA | WCMA | Existing | 8.452 | 8.452 | 8.452 | 8.452 | 8.452 | 8.452 | 8.452 | 8.452 | 8.452 | 8.452 | 8.452 | 8.452 |
| 12670 | ngrid_nem | Demand | 8506 | Southeast | MA | NEMA | Existing | 178.356 | 178.356 | 178.356 | 178.356 | 178.356 | 178.356 | 178.356 | 178.356 | 178.356 | 178.356 | 178.356 | 178.356 |
| 12671 | ngrid_nh_f | Demand | 8505 | Northern N | NH | NH | Existing | 8.929 | 8.929 | 8.929 | 8.929 | 8.929 | 8.929 | 8.929 | 8.929 | 8.929 | 8.929 | 8.929 | 8.929 |
| 12672 | ngrid_ri_fc | Demand | 8506 | Southeast | RI | RI | Existing | 251.499 | 251.499 | 251.499 | 251.499 | 251.499 | 251.499 | 251.499 | 251.499 | 251.499 | 251.499 | 251.499 | 251.499 |
| 12673 | ngrid_sem | Demand | 8506 | Southeast | MA | SEMA | Existing | 275.625 | 275.625 | 275.625 | 275.625 | 275.625 | 275.625 | 275.625 | 275.625 | 275.625 | 275.625 | 275.625 | 275.625 |
| 12674 | ngrid_wcm | Demand | 8500 | Rest-of-Pool | MA | WCMA | Existing | 327.302 | 327.302 | 327.302 | 327.302 | 327.302 | 327.302 | 327.302 | 327.302 | 327.302 | 327.302 | 327.302 | 327.302 |
| 12684 | NSTAR EE S | Demand | 8506 | Southeast | MA | NEMA | Existing | 452.202 | 452.202 | 452.202 | 452.202 | 452.202 | 452.202 | 452.202 | 452.202 | 452.202 | 452.202 | 452.202 | 452.202 |
| 12685 | NSTAR EE S | Demand | 8506 | Southeast | MA | SEMA | Existing | 91.287 | 91.287 | 91.287 | 91.287 | 91.287 | 91.287 | 91.287 | 91.287 | 91.287 | 91.287 | 91.287 | 91.287 |
| 12693 | PSNH COR | Demand | 8505 | Northern N | NH | NH | Existing | 100.98 | 100.98 | 100.98 | 100.98 | 100.98 | 100.98 | 100.98 | 100.98 | 100.98 | 100.98 | 100.98 | 100.98 |
| 12694 | Acushnet C | Demand | 8506 | Southeast | MA | SEMA | Existing | 2.111 | 2.111 | 2.111 | 2.111 | 2.111 | 2.111 | 2.111 | 2.111 | 2.111 | 2.111 | 2.111 | 2.111 |
| 12696 | 7.9 MW CH | Demand | 8505 | Northern N | NH | NH | Existing | 10.8 | 10.8 | 10.8 | 10.8 | 10.8 | 10.8 | 10.8 | 10.8 | 10.8 | 10.8 | 10.8 | 10.8 |
| 12705 | Cape Light | Demand | 8506 | Southeast | MA | SEMA | Existing | 57.05 | 57.05 | 57.05 | 57.05 | 57.05 | 57.05 | 57.05 | 57.05 | 57.05 | 57.05 | 57.05 | 57.05 |
| 12749 | Bridgewater | Demand | 8506 | Southeast | MA | SEMA | Existing | 1.412 | 1.412 | 1.412 | 1.412 | 1.412 | 1.412 | 1.412 | 1.412 | 1.412 | 1.412 | 1.412 | 1.412 |
| 12753 | MA SEMA | Demand | 8506 | Southeast | MA | SEMA | Existing | 0.147 | 0.147 | 0.147 | 0.147 | 0.147 | 0.147 | 0.147 | 0.147 | 0.147 | 0.147 | 0.147 | 0.147 |
| 12754 | Tewksbury | Demand | 8500 | Rest-of-Pool | MA | WCMA | Existing | 0.517 | 0.517 | 0.517 | 0.517 | 0.517 | 0.517 | 0.517 | 0.517 | 0.517 | 0.517 | 0.517 | 0.517 |
| 12757 | NHEC Ener | Demand | 8505 | Northern N | NH | NH | Existing | 0.704 | 0.704 | 0.704 | 0.704 | 0.704 | 0.704 | 0.704 | 0.704 | 0.704 | 0.704 | 0.704 | 0.704 |
| 12779 | CPLN CT Or | Demand | 8500 | Rest-of-Pool | CT | CT | Existing | 4.989 | 4.989 | 4.989 | 4.989 | 4.989 | 4.989 | 4.989 | 4.989 | 4.989 | 4.989 | 4.989 | 4.989 |
| 12786 | CSG Aggreg | Demand | 8506 | Southeast | MA | NEMA | Existing | 12.318 | 12.318 | 12.318 | 12.318 | 12.318 | 12.318 | 12.318 | 12.318 | 12.318 | 12.318 | 12.318 | 12.318 |
| 12790 | CSG Aggreg | Demand | 8506 | Southeast | RI | RI | Existing | 0.217 | 0.217 | 0.217 | 0.217 | 0.217 | 0.217 | 0.217 | 0.217 | 0.217 | 0.217 | 0.217 | 0.217 |
| 12791 | CSG Aggreg | Demand | 8506 | Southeast | MA | SEMA | Existing | 1.517 | 1.517 | 1.517 | 1.517 | 1.517 | 1.517 | 1.517 | 1.517 | 1.517 | 1.517 | 1.517 | 1.517 |
| 12799 | CSG Aggreg | Demand | 8500 | Rest-of-Pool | MA | WCMA | Existing | 2.106 | 2.106 | 2.106 | 2.106 | 2.106 | 2.106 | 2.106 | 2.106 | 2.106 | 2.106 | 2.106 | 2.106 |
| 12801 | UES CORE | Demand | 8505 | Northern N | NH | NH | Existing | 7.748 | 7.748 | 7.748 | 7.748 | 7.748 | 7.748 | 7.748 | 7.748 | 7.748 | 7.748 | 7.748 | 7.748 |
| 12802 | University | Demand | 8500 | Rest-of-Pool | MA | WCMA | Existing | 10.26 | 10.26 | 10.26 | 10.26 | 10.26 | 10.26 | 10.26 | 10.26 | 10.26 | 10.26 | 10.26 | 10.26 |
| 12806 | WMECO - C | Demand | 8500 | Rest-of-Pool | MA | WCMA | Existing | 3.616 | 3.616 | 3.616 | 3.616 | 3.616 | 3.616 | 3.616 | 3.616 | 3.616 | 3.616 | 3.616 | 3.616 |
| 12822 | Burlington | Demand | 8505 | Northern N | VT | VT | Existing | 6.837 | 6.837 | 6.837 | 6.837 | 6.837 | 6.837 | 6.363 | 6.363 | 6.363 | 6.363 | 6.837 | 6.837 |
| 12832 | CPLN MA N | Demand | 8506 | Southeast | MA | NEMA | Existing | 9.266 | 9.266 | 9.266 | 9.266 | 9.266 | 9.266 | 8.721 | 8.721 | 8.721 | 8.721 | 9.266 | 9.266 |
| 12835 | CPLN MA S | Demand | 8506 | Southeast | MA | SEMA | Existing | 4.983 | 4.983 | 4.983 | 4.983 | 4.983 | 4.983 | 3.848 | 3.848 | 3.848 | 3.848 | 4.983 | 4.983 |
| 12838 | CPLN MA V | Demand | 8500 | Rest-of-Pool | MA | WCMA | Existing | 10.299 | 10.299 | 10.299 | 10.299 | 10.299 | 10.299 | 10.299 | 10.299 | 10.299 | 10.299 | 10.299 | 10.299 |
| 12843 | CPLN RI OP | Demand | 8506 | Southeast | RI | RI | Existing | 2.44 | 2.44 | 2.44 | 2.44 | 2.44 | 2.44 | 2.44 | 2.44 | 2.44 | 2.44 | 2.44 | 2.44 |
| 12845 | Vermont E | Demand | 8505 | Northern N | VT | VT | Existing | 99.96 | 99.96 | 99.96 | 99.96 | 99.96 | 99.96 | 99.96 | 99.96 | 99.96 | 99.96 | 99.96 | 99.96 |
| 13669 | Mancheste | Generator | 8500 | Rest-of-Pool | CT | CT | Existing | 0.127 | 0.127 | 0.127 | 0.127 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 13673 | MATEP (DI | Generator | 8506 | Southeast | MA | NEMA | Existing | 11.08 | 11.08 | 11.08 | 11.08 | 11.08 | 11.08 | 11.08 | 11.08 | 11.08 | 11.08 | 11.08 | 11.08 |
| 13675 | MATEP (CC | Generator | 8506 | Southeast | MA | NEMA | Existing | 46.785 | 46.785 | 46.785 | 46.785 | 46.785 | 46.785 | 46.785 | 46.785 | 46.785 | 46.785 | 46.785 | 46.785 |
| 13703 | Verso VCG | Generator | 8503 | Maine | ME | ME | Existing | 47.223 | 47.223 | 47.223 | 47.223 | 47.223 | 47.223 | 55.461 | 55.461 | 55.461 | 55.461 | 47.223 | 47.223 |
| 13704 | Verso VCG | Generator | 8503 | Maine | ME | ME | Existing | 43.475 | 43.475 | 43.475 | 43.475 | 43.475 | 43.475 | 56.321 | 56.321 | 56.321 | 56.321 | 43.475 | 43.475 |

Attachment B

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc.

) **Docket No. ER21-___-000**

**TESTIMONY OF ROBERT G. ETHIER
ON BEHALF OF ISO NEW ENGLAND INC.**

1 **Q: PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

2 A: My name is Robert G. Ethier. I am employed by ISO New England Inc. (the
3 “ISO”) as Vice President of System Planning. My business address is One
4 Sullivan Road, Holyoke, Massachusetts 01040.

5

6 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND
7 WORK EXPERIENCE.**

8 A: I have a Bachelor of Arts degree in Economics from Yale University, a Masters in
9 Resource Economics from Cornell University, and a Ph.D. in Resource
10 Economics from Cornell University. Since 2000, I have worked at the ISO in
11 various roles. I was responsible for Market Monitoring for nearly four years and
12 Resource Adequacy for more than two years before becoming Vice President of
13 Market Development in July 2008. In July 2014, I became Vice President of
14 Market Operations and in November of 2019, I became Vice President of System
15 Planning. Before 2000, I was a Senior Associate at Stratus Consulting with
16 responsibility for energy market modeling.

17

1 **Q: WHAT ARE THE PURPOSES OF YOUR TESTIMONY?**

2 A: My testimony has two purposes. The first purpose of my testimony is to certify
3 that resources participating in the fifteenth Forward Capacity Auction (“FCA”),
4 which was held on February 8, 2021, were properly qualified in accordance with
5 Section III.13.1 of the ISO New England Transmission, Markets, and Services
6 Tariff (the “Tariff”). Section III.13.8.2 (b) of the Tariff requires that
7 documentation regarding the competitiveness of the FCA be filed with the
8 Commission. Section III.13.8.2 (b) states that such documentation may include a
9 certification from the ISO that all entities offering and bidding in the FCA were
10 properly qualified in accordance with Section III.13.1 of the Tariff. My testimony
11 provides such certification. The second purpose of my testimony is to explain the
12 auction prices resulting from the fifteenth FCA.

13
14 **Q: WERE ALL RESOURCES OFFERING AND BIDDING IN THE**
15 **FIFTEENTH FCA HELD ON FEBRUARY 8, 2021 PROPERLY**
16 **QUALIFIED IN ACCORDANCE WITH TARIFF SECTION III.13.1?**

17 A: Yes. Section III.13.1 of the Tariff sets forth the process for qualification in the
18 FCA. I was responsible for overseeing the qualification of all resources in the
19 fifteenth FCA held on February 8, 2021. I certify that, to the best of my
20 knowledge, all resources offering and bidding in the fifteenth FCA were properly
21 qualified in accordance with Section III.13.1 of the Tariff. In a November 10,

1 2020 informational filing with the Commission, the ISO provided resources
2 qualified to participate in the fifteenth FCA.¹

3

4 **Q: WHAT WAS YOUR ROLE IN THE DEVELOPMENT OF THE LIST OF**
5 **RESOURCES THAT RECEIVED CAPACITY SUPPLY OBLIGATIONS**
6 **IN THE FIFTEENTH FCA?**

7 A: Section III.13.8.2 (a) of the Tariff requires the ISO to provide a list of resources
8 that received Capacity Supply Obligations in each Capacity Zone and the size of
9 the Capacity Supply Obligations. The ISO has provided this information in
10 Attachment A to this filing. As the Vice President of System Planning,
11 Attachment A was developed under my supervision and direction.

12

13 **Q: WHAT CAPACITY ZONES WERE MODELED IN THE FIFTEENTH**
14 **FCA?**

15 A: Four Capacity Zones were modeled in the fifteenth FCA: the Southeastern New
16 England (“SENE”) Capacity Zone, the Northern New England (“NNE”) Capacity
17 Zone, the Maine Capacity Zone (“Maine”) and the Rest-of-Pool (“ROP”)
18 Capacity Zone. The SENE Capacity Zone included Northeastern
19 Massachusetts/Boston, Southeastern Massachusetts, and Rhode Island. The NNE
20 Capacity Zone included Maine, New Hampshire, and Vermont. The Maine
21 Capacity Zone included Maine and was nested within the NNE Capacity Zone.

¹ *ISO New England Inc.*, Informational Filing for Qualification in the Forward Capacity Market, Docket No. ER21-372-000 (filed November 10, 2020) (“Informational Filing”).

1 The ROP Capacity Zone included Connecticut and Western/Central
2 Massachusetts. As detailed in the ISO's Informational Filing for the fifteenth
3 FCA, the Local Sourcing Requirement for the import-constrained SENE Capacity
4 Zone was 10,305 MW.² For the export-constrained NNE Capacity Zone, the
5 Maximum Capacity Limit was 8,680 MW.³ For the export-constrained Maine
6 Capacity Zone, the Maximum Capacity Limit was 4,145 MW.⁴ Under Section
7 III.13.2.2 of the Tariff, the total amount of capacity cleared in the FCA is
8 determined using the System-Wide Capacity Demand Curve and Capacity Zone
9 Demand Curves.

10

11 **Q: PLEASE PROVIDE GRAPHS OF THE DEMAND CURVES THAT THE**
12 **ISO CALCULATED FOR THE FIFTEENTH FCA.**

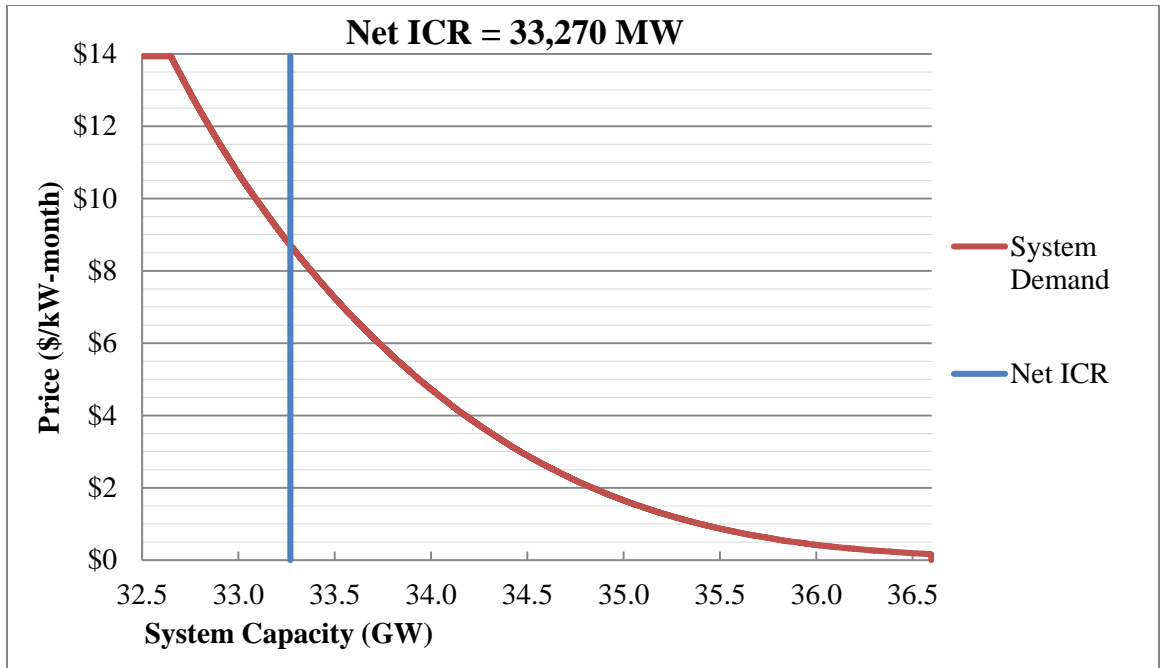
13 A: As required under Section III.12 of the Tariff, the ISO calculated the following
14 Demand Curves for the fifteenth FCA:

15 1. System-Wide Capacity Demand Curve

² Informational Filing at 9.

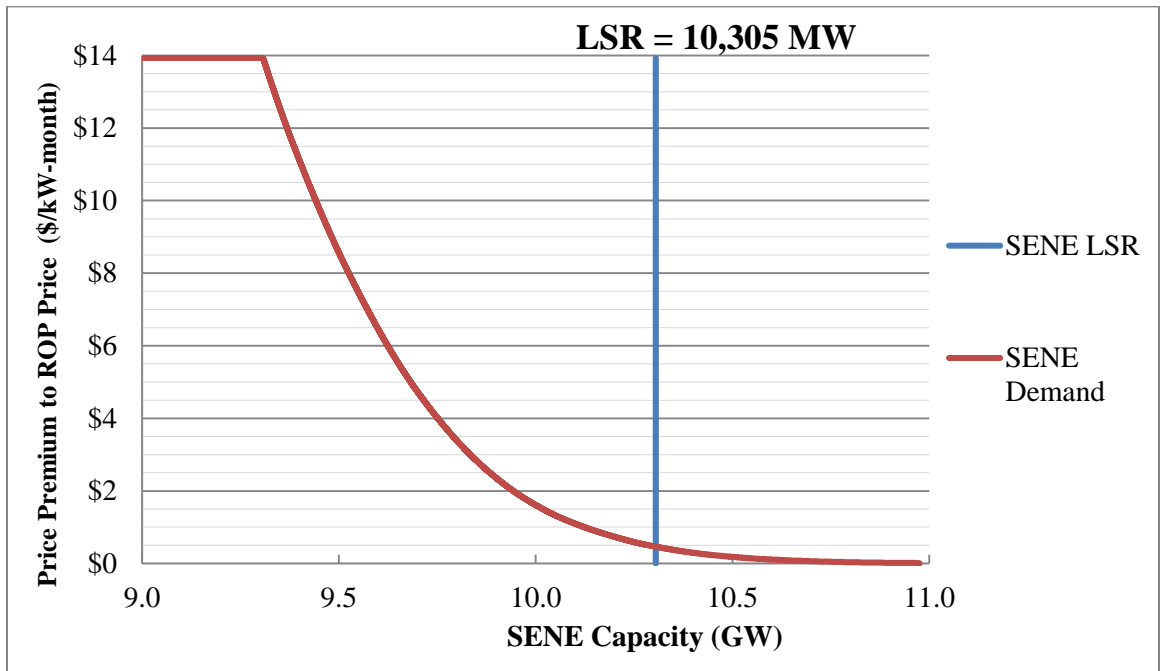
³ *Id.*

⁴ *Id.*



1

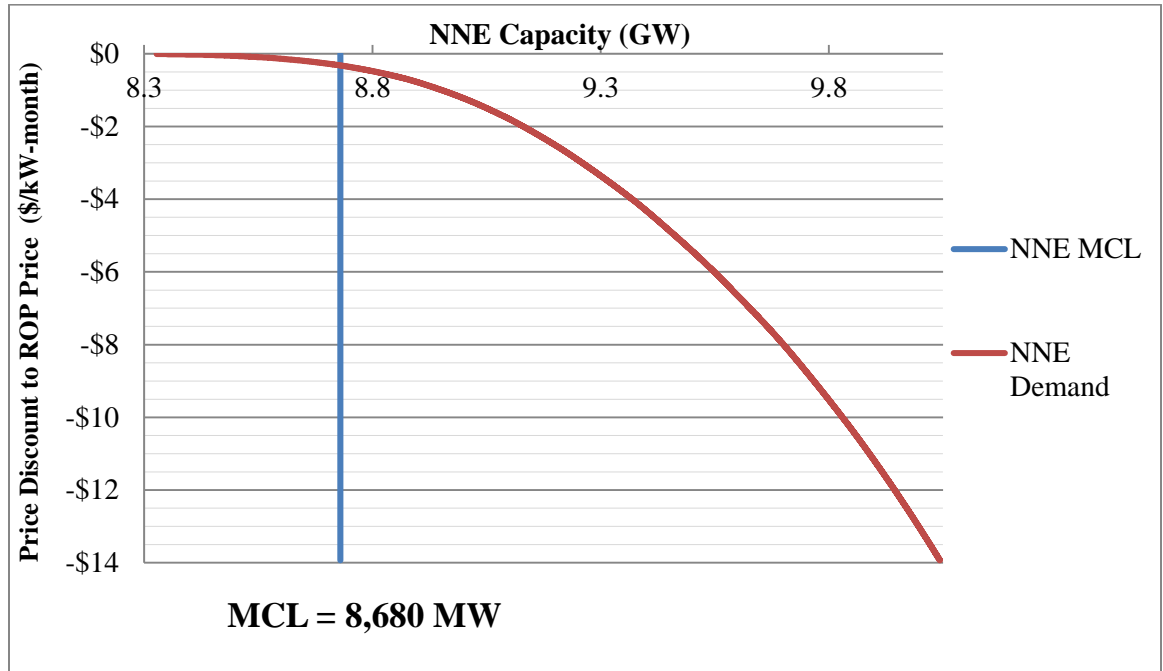
2. Import-constrained Capacity Zone Demand Curve for the SENE Capacity Zone



3

1

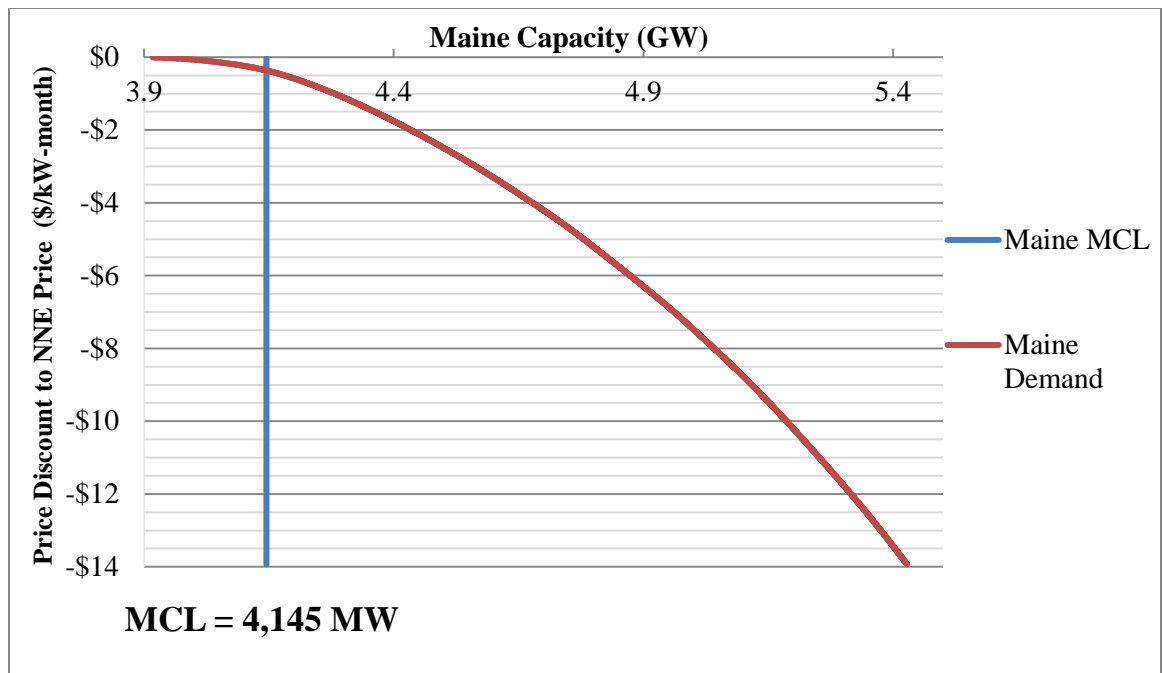
3. Export-constrained Capacity Zone Demand Curve for the NNE Capacity Zone



2

3

4. Export-constrained Capacity Zone Demand Curve for the Maine Capacity Zone

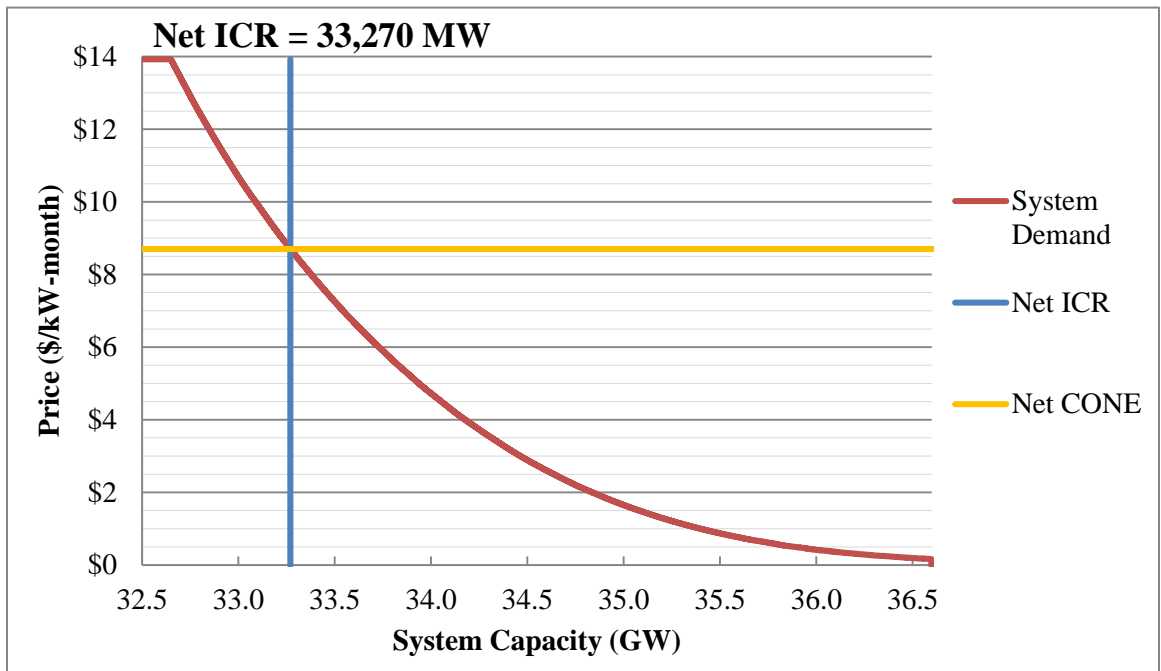


4

5

1 **Q: CAN YOU PROVIDE A GRAPH OF THE SYSTEM-WIDE CAPACITY**
2 **DEMAND CURVE ALONG WITH THE NET INSTALLED CAPACITY**
3 **REQUIREMENT (“NET ICR”) AND NET COST OF NEW ENTRY (“NET**
4 **CONE”) FOR THE FIFTEENTH FCA?**

5 A: Yes. Below is a graph of the System-Wide Capacity Demand Curve, Net CONE,
6 and Net ICR:



7
8

9 **Q: WHAT CAUSED THE DESCENDING CLOCK AUCTION TO CLOSE?**

10 A: The descending clock auction commenced with a starting price of \$13.932/kW-
11 month. The descending clock auction closed for the SENE Capacity Zone after
12 the fourth round of bidding when an offer withdrawal resulted in zonal supply
13 falling short of zonal demand in the SENE Capacity Zone.

1 The descending clock auction closed for the ROP Capacity Zone after the fifth
2 round of bidding when a Dynamic De-List Bid resulted in system-wide supply
3 falling short of system-wide demand.

4
5 The descending clock auction closed for both the NNE Capacity Zone and the
6 Maine Capacity Zone after the fifth round of bidding when a Dynamic De-List
7 Bid in the NNE Capacity Zone resulted in its zonal supply falling short of its
8 zonal demand. At the same price, the Maine Capacity Zone's supply was less
9 than its zonal demand. Therefore, the Maine Capacity Zone closed
10 contemporaneously with the NNE Capacity Zone.

11
12 For each of the four Capacity Zones, the descending clock auction closed below
13 the Dynamic De-List Bid Threshold.

14
15 **Q: WHAT WERE THE FORWARD CAPACITY AUCTION CLEARING**
16 **PRICES FOR THE CAPACITY ZONES?**

17 A: Resources in the SENE Capacity Zone will be paid at the Capacity Clearing Price
18 set pursuant to the SENE Capacity Demand Curve, which is \$3.980/kW-month.⁵
19 Resources in the ROP Capacity Zone will be paid at the Capacity Clearing Price
20 set pursuant to the System-Wide Capacity Demand Curve, which is \$2.611/kW-
21 month.⁶ Resources in the NNE Capacity Zone and resources in the Maine

⁵ Existing Capacity Resources with multi-year obligations from previous auctions will be paid based on the Capacity Clearing Price in the auction in which they originally cleared. Self-supplied resources will not be paid through the FCM.

1 Capacity Zone will be paid at the Capacity Clearing Price set pursuant to the NNE
2 Capacity Demand Curve, which is \$2.477/kW-month.⁶

3

4 **Q: WHY WAS THE CAPACITY CLEARING PRICE \$3.980/KW-MONTH IN**
5 **THE SENE CAPACITY ZONE?**

6 A: In the SENE Capacity Zone, at prices at and above \$3.980/kW-month, zonal
7 supply was greater than zonal demand. At prices below \$3.980/kW-month, zonal
8 supply was less than zonal demand. The withdrawal of a non-rationable offer at
9 \$3.979/kW-month caused zonal supply to fall short of zonal demand. Pursuant to
10 the FCM rules, many offers from new capacity and many de-list bids from
11 existing capacity are non-rationable (sometimes called indivisible). That is, the
12 entire offer segment must clear or not clear. Under Section III.13.2.7.4 of the
13 Tariff, where non-rationable offers prohibit the descending clock auction from
14 clearing the precise amount of capacity required, the auctioneer analyzes the
15 aggregate supply curve “to determine cleared capacity offers and Capacity
16 Clearing Prices that seek to maximize social surplus for the associated Capacity
17 Commitment Period. The clearing algorithm may result in offers below the
18 Capacity Clearing Price not clearing, and in de-list bids below the Capacity
19 Clearing Price clearing.”

20

21 The ISO utilizes a clearing engine to solve a mixed-integer quadratic
22 programming problem to identify the optimal combination of offers to clear,
23 which is the combination of offers that maximizes social surplus. Social surplus

1 (sometimes called social welfare) is, in this case, the sum of consumer surplus
2 (the difference between the amount that consumers would be willing to pay as
3 defined by the Demand Curve and the amount they actually pay) and producer
4 surplus (the difference between the amount that suppliers are actually paid and the
5 amount that they would have been willing to accept) minus deadweight loss.

6
7 With exclusively rationable (sometimes called divisible) offers and bids, the
8 marginal offer can be partially cleared in order for supply to precisely meet
9 demand, preventing any deadweight loss. Therefore, where all offers are
10 rationable, social surplus is maximized when all supply to the left of the
11 intersection with demand is cleared. However, non-rationable offers can prevent
12 a clearing solution at the precise intersection of supply and demand. When this
13 occurs, a decision must be made to either clear less supply than demanded at the
14 clearing price (which generates less consumer surplus and producer surplus but no
15 deadweight loss), or to clear more supply than demanded at the clearing price
16 (which generates more consumer surplus and producer surplus, but also
17 deadweight loss). The optimal solution identifies the combination of cleared
18 supply offers that maximizes social surplus.

19
20 With the \$3.980/kW-month offer selected, zonal cleared supply exceeded zonal
21 demand at the Capacity Clearing Price of \$3.980/kW-month by 43.141 MW.
22 Although the non-rationable offer in SENE at \$3.980/kW-month resulted in
23 deadweight loss due to clearing more supply than was demanded at that price,

1 clearing the offer contributed to social surplus. To better match zonal supply to
2 zonal demand, the clearing engine simultaneously searched in the SENE Capacity
3 Zone at prices below \$3.980/kW-month for offers to exclude from clearing and
4 de-list bids to include in clearing which would result in greater social surplus.
5 However, the clearing engine did not find any such offers or de-list bids because
6 each offer priced below \$3.980/kW-month increased social surplus when cleared.
7 And, each de-list bid priced below \$3.980/kW-month decreased social surplus
8 when cleared.

9
10 The Capacity Clearing Price was \$3.980/kW-month because this was the lowest
11 price at which the marginal resource satisfying SENE demand was willing to
12 accept a Capacity Supply Obligation.⁶

13

14 **Q: WHY WAS THE CAPACITY CLEARING PRICE \$2.611/KW-MONTH IN**
15 **THE ROP CAPACITY ZONE WHILE THE CAPACITY CLEARING**
16 **PRICE WAS \$2.477/KW-MONTH IN BOTH THE NNE AND MAINE**
17 **CAPACITY ZONES?**

18 A: Across the New England Control Area, at prices at and above \$2.611/kW-month,
19 system-wide supply was greater than system-wide demand. At prices below

⁶ For more information on the mechanics and implications of clearing non-rationable offers, please see my testimony for the ninth and tenth Forward Capacity Auctions. Forward Capacity Auctions Results, *ISO New England Inc.*, Docket No. ER15-1137-000 (Feb. 27, 2015), available at https://www.iso-ne.com/static-assets/documents/2015/02/er15-____-000_2-27-15_fca_9_results_filing.pdf; Forward Capacity Auctions Results, *ISO New England Inc.*, Docket No. ER16-1041-000 (Feb. 29, 2016), available at https://www.iso-ne.com/static-assets/documents/2016/02/er16-____-000_2-29-16_fca_10_results_filing.pdf

1 \$2.611/kW-month, system-wide supply was less than system-wide demand. A
2 Dynamic De-List Bid at \$2.610/kW-month set the Capacity Clearing Price at
3 \$2.611/kW-month in the ROP Capacity Zone. Dynamic De-List Bids can be
4 rationed, which means that they can be taken in part or in full, subject to the
5 resource's Rationing Minimum Limit. The price-setting de-list bid was rationed
6 to the greatest extent possible, while honoring the resource's Rationing Minimum
7 Limit, resulting in the resource receiving a Capacity Supply Obligation quantity
8 equal to its Rationing Minimum Limit, and in system-wide supply exceeding
9 system-wide demand at the ROP Capacity Clearing Price. Although system-wide
10 supply still exceeded system-wide demand at the ROP Capacity Clearing Price
11 after rationing this Dynamic De-List Bid, selecting it to clear contributed to social
12 surplus. The Capacity Clearing Price in the ROP Capacity Zone was \$2.611/kW-
13 month because this was the lowest price at which the marginal resource satisfying
14 system-wide demand was willing to accept a Capacity Supply Obligation.

15
16 In the NNE Capacity Zone, which includes the Maine Capacity Zone, at prices at
17 and above \$2.468/kW-month, offered zonal supply was greater than zonal
18 demand. At prices below \$2.468/kW-month, offered zonal supply was less than
19 zonal demand.

20
21 To better match system supply to system demand, the clearing engine
22 simultaneously searched for inframarginal offers to exclude from clearing or
23 inframarginal de-list bids to include in clearing which would result in greater

1 social surplus. The clearing engine found two Dynamic De-List Bids in the NNE
2 Capacity Zone, both priced below \$2.468/kW-month, that contributed to social
3 surplus by clearing (that is, by not receiving a Capacity Supply Obligation).
4 While these Dynamic De-List Bids intuitively would not have cleared, social
5 surplus was maximized by clearing them. As a result, cleared system-wide supply
6 exceeded cleared system-wide demand at the ROP Capacity Clearing Price by
7 23.208 MW, and the NNE Capacity Zone Demand Curve set the Capacity
8 Clearing Prices in the NNE Capacity Zone and the Maine Capacity Zone at
9 \$2.477/kW-month.⁷

10

11 **Q: WHY DO THE CLEARING PRICES FOR THE ROP CAPACITY ZONE**
12 **AND THE SENE CAPACITY ZONE NOT PRECISELY MATCH THOSE**
13 **CALCULATED USING THE PUBLISHED DEMAND CURVES AND**
14 **CLEARED QUANTITIES?**

15 A: If the marginal de-list bid satisfying system-wide demand had been fully
16 rationable, then the total cleared system-wide supply quantity would have
17 precisely matched the quantity demanded pursuant to the System-Wide Capacity
18 Demand Curve at the ROP Capacity Clearing Price. However, because the
19 marginal de-list bid was not fully rationable, the total cleared system-wide supply
20 quantity was 34,621.065 MW, including 23.208 MW of supply exceeding demand
21 at the ROP Capacity Clearing Price. Subtracting 23.208 MW from this total

⁷ For more information on the mechanics and implications of clearing non-rationable offers, please see my testimony for the ninth and tenth Forward Capacity Auctions. *See id.*

1 cleared system-wide supply quantity results in 34,597.857 MW, which
2 corresponds to \$2.611/kW-month on the System-Wide Capacity Demand Curve.

3
4 Likewise, if the marginal offer in the SENE Capacity Zone had been fully
5 rationable, then the total cleared supply quantity in the SENE Capacity Zone
6 would have precisely matched the quantity demanded pursuant to the SENE
7 Capacity Demand Curve at the SENE Capacity Clearing Price. However, because
8 the marginal offer in the SENE Capacity Zone was not fully rationable, the total
9 cleared supply quantity in the SENE Capacity Zone was 10,084.808 MW,
10 including 43.141 MW of supply exceeding demand at the SENE Capacity
11 Clearing Price. Subtracting 43.141 MW from this total cleared supply quantity
12 results in 10,041.667 MW, which corresponds to \$1.369/kW-month on the SENE
13 Capacity Demand Curve, and when added to the ROP Capacity Clearing Price of
14 \$2.611/kW-month, results in a total price of \$3.980/kW-month.

15

16 **Q: WHAT WERE THE CAPACITY CLEARING PRICES ON THE**
17 **EXTERNAL INTERFACES?**

18 A: Imports over the New York AC Ties external interface, totaling 684.059 MW, and
19 imports over the Phase I/II HQ Excess external interface, totaling 517.000 MW,
20 will receive \$2.611/kW-month. Imports over the Hydro-Quebec Highgate
21 external interface, totaling 60.000 MW, and imports over the New Brunswick
22 external interface, totaling 226.000 MW, will receive \$2.477/kW-month.

23

1 **Q: FOLLOWING COMPLETION OF THE PRIMARY AUCTION-**
2 **CLEARING PROCESS, WAS A SUBSTITUTION AUCTION**
3 **ADMINISTERED? IF NOT, WHY?**

4 A: A substitution auction was not administered because no demand bid met the
5 requirements of a substitution auction demand bid, and at least one substitution
6 auction demand bid is necessary in order to conduct the substitution auction.
7 Specifically, in order for a demand bid to be submitted in the substitution auction,
8 the demand bid must meet the following requirements: (1) the demand bid must
9 have met all of the conditions to participate in the substitution auction as specified
10 in Section III.13.2.8.3 of the Tariff; (2) the associated Existing Capacity Resource
11 must have received a Capacity Supply Obligation in the primary auction-clearing
12 process as described in Section III.13.2.8.3.1. of the Tariff; and (3) ninety percent
13 of the associated Existing Capacity Resource's substitution auction test price must
14 be at or below the Capacity Clearing Price as described in Section III.13.2.8.3.3 of
15 the Tariff. However, no demand bids satisfied these criteria, and, for that reason,
16 a substitution auction was not conducted. Accordingly, while Section III.13.8.2
17 of the Tariff requires the instant filing to include the substitution auction clearing
18 prices and the total amount of payments associated with any demand bids cleared
19 at a substitution auction clearing price above their demand bid prices, because a
20 substitution auction was not conducted, that information is not included in this
21 filing.

1 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

2 A: Yes.

3

4 I declare that the foregoing is true and correct.

5

6

7

8

9

10 February 26, 2021



Robert G. Ethier

Attachment C

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc.

) **Docket No. ER21-___-000**

TESTIMONY OF ALAN MCBRIDE

1 **Q: PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

2 A: My name is Alan McBride. I am Director of Transmission Services and Resource
3 Qualification with ISO New England Inc. (the “ISO”). My business address is
4 One Sullivan Road, Holyoke, Massachusetts 01040.

5

6 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND
7 WORK EXPERIENCE.**

8 A: I joined the ISO in June 2006 and for the following four years my primary
9 responsibility was as Project Manager of New Generation Qualification for the
10 Forward Capacity Market.¹ In 2010, I became the Manager, Area Transmission
11 Planning for northern New England, and continued in that position until 2015,
12 when I became Director of Transmission Services. In that position, I have been
13 responsible for the oversight of the ISO’s interconnection process for new
14 Generating Facilities and Elective Transmission Upgrades. In November 2019,
15 my responsibilities were expanded to include the qualification of resources in the
16 Forward Capacity Market (“FCM”). Accordingly, my current title is Director of
17 Transmission Services and Resource Qualification.

¹ Capitalized terms used but not defined in this testimony are intended to have the meaning given to such terms in the ISO New England Inc. Transmission, Markets and Services Tariff.

1 Before joining the ISO, I worked at Dynegy Inc. and then at Calpine Corporation.
2 At both companies, I supported various transmission-related activities associated
3 with the development, interconnection, and commercial operation of merchant
4 generation facilities. Prior to joining Dynegy, I worked at Power Technologies
5 Incorporated (now a division of Siemens Industries), where I conducted various
6 transmission analysis studies, including the system impact studies of several
7 proposed generating facilities.

8
9 I have 23 years of experience in various aspects of power transmission system
10 analysis and transmission services. I hold a B.S. degree in Electrical Engineering
11 from University College Dublin, in Ireland, a Master's degree in Electric Power
12 Engineering from Rensselaer Polytechnic Institute, and an M.B.A. degree from
13 Purdue University.

14

15 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16 A: The purpose of my testimony is to explain the ISO's reliability review of de-list
17 bids submitted in the fifteenth Forward Capacity Auction ("FCA").

18

19 **Q: WHAT WAS YOUR ROLE IN THE RELIABILITY REVIEW OF THE**
20 **VARIOUS DE-LIST BIDS?**

21 A: As the ISO's Director of Transmission Services and Resource Qualification, I
22 oversaw the reliability review of all submitted de-list bids.

23

1 **Q: WHAT TYPES OF DE-LIST BIDS DOES THE ISO REVIEW?**

2 A: There are five different types of de-list bids that are reviewed for reliability:
3 Permanent De-List Bids, Retirement De-List Bids, Static De-List Bids, Export
4 De-List Bids, and Dynamic De-List Bids. With the exception of Dynamic De-
5 List Bids,² all de-list bids are submitted and reviewed for reliability in advance of
6 the FCA.

7
8 **Q: HOW MANY TYPES OF REVIEW DOES THE ISO PERFORM ON DE-**
9 **LIST BIDS?**

10 A: The ISO performs two types of review on de-list bids. I explain each of those
11 below.

12
13 **Q: PLEASE EXPLAIN THE FIRST TYPE OF REVIEW THAT THE ISO**
14 **PERFORMS ON DE-LIST BIDS.**

15 A: Pursuant to Section III.13.1.2.3.2 of the Tariff, prior to the auction, the ISO's
16 Internal Market Monitor ("IMM") reviews Export De-List Bids and Static De-List
17 Bids submitted above the Dynamic De-List Bid threshold, which was set at
18 \$4.30/kW-month for the fifteenth FCA, to determine whether the bids are
19 consistent with the resource's net risk-adjusted going forward and opportunity
20 costs. This review is not performed for Dynamic De-List Bids, which are

² Dynamic De-List Bids are reviewed for reliability as a part of the real-time auction process. See Sections III.13.2.3.2 (d) and 13.2.5.2.5 of the Tariff.

1 submitted during the auction itself, if the price drops below the Dynamic De-List
2 Bid threshold (\$4.30/kW-month for the fifteenth FCA).

3
4 In addition, prior to the auction, the IMM reviews all submitted Permanent and
5 Retirement De-List Bids regardless of price, and a filing was made on July 2,
6 2020 (Docket No. ER20-2317-000) indicating, on a confidential basis: (i) the
7 IMM's determination with respect to each Permanent De-List Bid and Retirement
8 De-List Bid, (ii) supporting documentation for each determination, (iii) the
9 capacity that will permanently de-list or retire prior to the FCA, and (iv) whether
10 capacity suppliers that submitted the bids have elected to conditionally or
11 unconditionally retire the capacity pursuant to Section III.13.1.2.4.1.³

12
13 **Q: PLEASE EXPLAIN THE SECOND TYPE OF REVIEW THAT THE ISO**
14 **PERFORMS ON DE-LIST BIDS.**

15 A: Pursuant to Section III.13.2.5.2.5 of the Tariff and ISO New England Planning
16 Procedure No. 10 – Planning Procedure to Support the Forward Capacity Market,
17 the ISO reviews each Retirement De-List Bid, Permanent De-List Bid, Export De-
18 List Bid, Administrative Export De-List Bid, and Static De-List Bid to determine
19 if the capacity associated with the bid is needed for local reliability during the
20 Capacity Commitment Period associated with the FCA. The Tariff provides that
21 capacity will be needed for local reliability if the absence of that capacity would

³ The Commission accepted the filing on August 19, 2020. *See ISO New England Inc.*, Docket No. ER20-2317-000, (Delegated letter order Aug. 19, 2020).

1 result in violation of any NERC, NPCC, or ISO criteria.⁴ If the capacity
2 associated with the de-list bid is determined not to be needed for local reliability,
3 and the auction price falls to or below the de-list bid price, then the capacity
4 associated with the bid is removed from the auction.

5
6 **Q: FOR THE FIFTEENTH FCA, HOW MANY DE-LIST BIDS DID THE ISO**
7 **REVIEW FOR RELIABILITY?**

8 A: The ISO reviewed one Permanent De-List Bid totaling approximately 42.590 MW
9 and 11 Retirement De-List Bids totaling approximately 52.975 MW.⁵ A total of
10 813.019 MW of pre-auction Static De-List Bids were submitted. However,
11 pursuant to Tariff Section III.13.1.2.3.1.1, prior to the auction, participants elected
12 to withdraw approximately 674 MW of their submitted Static De-List Bids. As a
13 result, the ISO reviewed 139.019 MW of Static De-List Bids. Finally, no Export
14 De-List Bids or Administrative Export De-List Bids were submitted for the
15 fifteenth FCA.

16
17 During the fourth round of the auction where the price fell below \$4.30/kW-
18 month (*i.e.*, the threshold for submission of Dynamic De-List Bids prescribed for
19 the fifteenth FCA), 36 Dynamic De-List Bids were submitted, seeking to delist

⁴ Section III.13.2.5.2.5 of the Tariff.

⁵ The totals noted above do not include two Retirement De-List Bid for resources that elected to not be reviewed for reliability.

1 approximately 677.522 MW.⁶ All Dynamic De-List Bids submitted were
2 reviewed for reliability.

3
4 During the fifth round of the auction, 126 Dynamic De-List Bids were submitted,
5 seeking to delist approximately 2,811.526 MW. De-list bids are reviewed for
6 reliability in descending price order. The ISO reviewed a sufficient quantity of
7 Dynamic De-List Bids associated with reaching the closing price of the auction.
8 In this case, during the auction, the ISO reviewed 27 of the Dynamic De-List Bids
9 submitted in the fifth round, totaling 737.894 MW.

10

11 **Q: DID THE ISO REVIEW SHOW THE NEED TO RETAIN FOR**
12 **RELIABILITY ANY RESOURCES THAT SUBMITTED DE-LIST BIDS**
13 **FOR THE FIFTEENTH FCA?**

14 **A:** No. The ISO's review of de-list bids did not show the need to retain for reliability
15 any resources that submitted de-list bids for the fifteenth FCA. Accordingly, the
16 ISO did not reject any de-list bids that it studied for the fifteenth FCA.

17

18 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

19 **A:** Yes.

⁶ The fourth round was the first round of the auction in which Dynamic De-List Bids could be submitted.

1 I declare that the foregoing is true and correct.

2

3

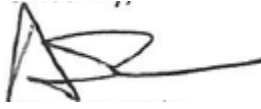
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February 26, 2021

A handwritten signature in black ink, appearing to read 'Alan McBride', is written over a horizontal line.

Alan McBride

Attachment D

1 UNITED STATES OF AMERICA
2 BEFORE THE
3 FEDERAL ENERGY REGULATORY COMMISSION
4

5
6)
7 ISO New England Inc.) Docket No. ER21-____-000
8)
9)

10 TESTIMONY OF LAWRENCE M. AUSUBEL
11

12 **Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

13 A. My name is Lawrence M. Ausubel. I am the Founder and Chairman of Power
14 Auctions LLC, the company that has helped to design, implement, and administer
15 the Forward Capacity Auction (“FCA”) for ISO New England Inc. (the “ISO”).
16 I am also a Professor of Economics at the University of Maryland. My business
17 address is 3333 K St. NW Suite 425, Washington, DC 20007.
18

19 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**
20 **WORK EXPERIENCE.**

21 A. I have an A.B. in Mathematics from Princeton University, an M.S. in
22 Mathematics from Stanford University, an M.L.S. in Legal Studies from Stanford
23 University, and a Ph.D. in Economics from Stanford University.
24 I am the Chairman of Power Auctions LLC, a provider of auction implementation
25 services and software worldwide. I was also the President of Market Design Inc.,
26 an economics consultancy that (until its dissolution in 2016) offered services in
27 the design of auction markets. I have played a lead role in the design and
28 implementation of: electricity auctions in France, Germany, Spain, Belgium and

1 the US; gas auctions in Germany, France, Hungary and Denmark; the world's first
2 auction for greenhouse gas emission reductions in the UK; and a prototype airport
3 slot auction in the US. I have advised the US Federal Communications
4 Commission, Innovation Science and Economic Development Canada, and the
5 Australian Communications and Media Authority on spectrum auctions. I have
6 also advised BOEM (the US Bureau of Ocean Energy Management) and ICANN
7 (the Internet Corporation for Assigned Names and Numbers) on auction design. I
8 hold 23 U.S. patents related to auction technology and I have published numerous
9 articles on auction design, bargaining, industrial organization and financial
10 markets. My curriculum vitae, which includes a list of publications and other
11 experience, is attached.

12
13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

14 A. The purpose of this testimony is to certify that the fifteenth FCA, which was held
15 on February 8, 2021, was conducted in accordance with the relevant provisions of
16 the ISO New England Transmission, Markets, and Services Tariff ("Tariff")
17 currently in effect. Section III.13.8.2 (b) of the Tariff requires that, after each
18 FCA, documentation regarding the competitiveness of the FCA be filed with the
19 Federal Energy Regulatory Commission ("Commission"). Section III.13.8.2 (b)
20 states that such documentation may include certification from the auctioneer that
21 the FCA was conducted in accordance with the provisions of Section III.13 of the
22 Tariff. Section III.13.2 of the Tariff provides the rules relating to the mechanics
23 of the FCA. My testimony certifies that the FCA was conducted in accordance

1 with Section III.13.2 of the Tariff.

2
3 **Q. PLEASE DESCRIBE POWER AUCTIONS LLC.**

4 A. Power Auctions LLC designs, implements and conducts high-stakes electronic
5 auctions utilizing proprietary software, processes, and other intellectual property.
6 The PowerAuctions software platform designed by Power Auctions LLC has been
7 used to implement over 300 auctions worldwide in the electricity, gas and
8 resource sectors. In the electricity sector, the software platform was used to
9 operate 42 quarterly EDF Generation Capacity Auctions in France. It was also
10 used for the Endesa-Iberdola Virtual Power Plant Auctions in Spain, the
11 Electrabel Virtual Power Plant Auctions in Belgium and the E.ON Virtual Power
12 Plant Auction in Germany. Currently, our software platform is also used for
13 implementing the UK's Capacity Market auctions and for implementing the
14 US Department of Interior's auctions of offshore wind energy tracts. Further,
15 Power Auctions LLC was part of the team that the US Federal Communications
16 Commission assembled to design and implement the FCC Incentive Auction
17 (2016–17), and it is prime contractor to the Governments of Australia, Canada
18 and the US for the ongoing design and implementation of spectrum auctions.

19
20 Power Auctions LLC worked with the ISO to design and implement (on the
21 PowerAuctions platform) the previous FCAs held on February 4-6, 2008;
22 December 8-10, 2008; October 5-6, 2009; August 2-3, 2010; June 6-7, 2011;
23 April 2-3, 2012; February 4-5, 2013; February 3, 2014; February 2, 2015;

1 February 8, 2016; February 6, 2017; February 5-6, 2018; February 4, 2019; and
2 February 3, 2020.

3
4 **Q. WHAT WAS POWER AUCTIONS LLC'S ROLE IN THE FIFTEENTH**
5 **FCA HELD ON FEBRUARY 8, 2021?**

6 A. The ISO retained Power Auctions LLC as the independent auction manager
7 ("Auction Manager") for the fifteenth FCA. As the Auction Manager, Power
8 Auctions LLC worked with the ISO to design and implement the FCA in
9 conformance with the Tariff. By design, the Auction Manager conducted the
10 auction independently, with limited involvement by the ISO. The auction was
11 implemented using the PowerAuctions software platform.

12
13 **Q. WAS THE FIFTEENTH FCA HELD ON FEBRUARY 8, 2021**
14 **CONDUCTED IN ACCORDANCE WITH SECTION III.13.2 OF THE**
15 **TARIFF?**

16 A. Yes. In accordance with Section III.13.8.2 (b) of the Tariff, I certify that, to the
17 best of my knowledge, the fifteenth FCA held on February 8, 2021 was conducted
18 in conformance with the provisions of Section III.13.2 of the Tariff.

19
20 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

21 A. Yes.

1 I declare that the foregoing is true and correct.


2

3 Executed on February 12, 2021

4

5

6

A handwritten signature in cursive script that reads "Lawrence Ausubel". The signature is written in black ink and is positioned to the right of the date.

Lawrence M. Ausubel

Curriculum Vitae

LAWRENCE M. AUSUBEL

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Education

Ph.D. (1984) Stanford University, Economics
M.L.S. (1984) Stanford Law School, Legal Studies
M.S. (1982) Stanford University, Mathematics
A.B. (1980) Princeton University, Mathematics

Honors: Fellow of the Econometric Society
Phi Beta Kappa
Sigma Xi
Magna cum laude in mathematics
Stanford University Economics Department, graduate fellowship, 1982
Stanford Law School, fellowship in law and economics, 1983

Fields of Concentration

Market Design
Auction Theory
Bargaining Theory
Microeconomic Theory and Game Theory
Credit Cards, Bankruptcy and Banking
Industrial Organization
Law and Economics

Professional Experience

Professor of Economics, University of Maryland (August 1992 – present).

Chairman and Founder, Power Auctions LLC (2003 – present).

Power Auctions LLC has been a technology provider of auction design, auction software, implementation services and intellectual property since 2003. The PowerAuctions™ software platform has been used for more than 300 high-stakes auctions on six continents, with total transaction values well in excess of \$100 billion.

President, Market Design Inc. (2003 – 2016).

Until its dissolution in 2016, Market Design Inc. was a consultancy of leading economists and game theorists (Al Roth, Peter Cramton, R. Preston McAfee, Paul Milgrom, Robert Wilson, et al) that worked with governments and companies worldwide to design and implement state-of-the-art auctions and markets.

Assistant Professor of Managerial Economics and Decision Sciences, Kellogg School, Northwestern University (September 1984 – August 1992).

Visiting Assistant Professor, New York University (January 1990 – May 1990).

Recent Consulting Experience

Provided expert bidding advice to bidders in more than a dozen large spectrum auctions, including Bharti Airtel in India's 900/1800 MHz auction, Orange in Slovakia's Multi-Band spectrum auction, Three (Hutchison) in the UK 4G and PSSR auctions, Eircom in Ireland's 800/900/1800 MHz auction, Aircel in India's 3G/BWA auctions, Spain's Telefónica in the UK, German, Italian and Austrian UMTS/3G spectrum auctions, Ericsson in the US PCS spectrum auctions, MTN in the Nigerian spectrum auctions, MCI in the US Direct Broadcast Satellite auction, US Airwaves in the US C-Block Auction, Mobile Media in the US Narrowband Auction, and other confidential clients.

Advised the Secretaría de Energía (SENER) by preparing an expert report on Mexico's first two capacity auctions and by providing advice for future auctions, 2016.

Provided expert bidding advice to a confidential client in India's 500 MW solar auction, 2015.

Advisor to the US government (Federal Communications Commission) on the design and implementation of the FCC Incentive Auction and all ongoing spectrum auctions and universal service fund auctions, 2011 – present.

Advisor to the Canadian government (Innovation, Science and Economic Development Canada) on the design and implementation of the 600 MHz, 700 MHz, 2.5 GHz, 3.5 GHz and mmWave spectrum auctions, 2010 – present.

Advisor to the Australian government (ACMA) on the design and implementation of the Australian Digital Dividend auction and all subsequent spectrum auctions, 2011 –

present.

Provided auction design advice to the IDA Singapore on their Auction of Public Cellular Mobile Telecommunication Services Spectrum Rights, 2007 – 2008.

Design and implementation of the Trinidad and Tobago GSM auction, 2005.

Design and implementation of the UK Capacity Market auction (electricity, 2014 – present).

Design and implementation of auctions for offshore wind energy tracts for the Bureau of Ocean Energy Management (BOEM), US Department of Interior (2010 – present).

Design and implementation of the Forward Capacity Auction for ISO New England (electricity, 2007 – present).

Design and implementation of the quarterly Electricité de France generation capacity auctions (2001 – 2011) and Long-Term Contract auctions (2008 – 2009).

Design and implementation of the quarterly Spanish Virtual Power Plant (VPP) auctions (electricity, 2007 – 2009).

Design and implementation of the E.ON VPP auction in Germany (2007).

Design and implementation of the quarterly Electrabel Virtual Power Plant (VPP) auctions in Belgium (2003 – 2005).

Design and implementation of auctions for new gTLDs for ICANN (Internet Corporation for Assigned Names and Numbers (2008 – present).

Design and implementation of rough diamond auctions for Okavango Diamond Company, Botswana (2013 – present).

Design and implementation of rough diamond auctions for BHP Billiton/Dominion Diamonds (2007 – 2014).

Design and implementation of the annual E.ON Földgáz Trading gas release programme auction in Hungary (2006 – 2013).

Design and implementation of the annual Danish Oil and Natural Gas (DONG Energy) gas release programme auction (2006 – 2011).

Design and implementation of the annual E.ON Ruhrgas gas release programme auction in Germany (2003 – 2008, 2010).

Design and implementation of the Gaz de France gas storage auction (2006).

Design and implementation of the Gaz de France gas release programme auction (2004).

Design and implementation of the Total gas release programme auction (2004).

Design and implementation of the UK Emissions Trading Scheme auction to procure greenhouse gas emission reductions for the UK Government (2002).

Design and implementation of a demonstration auction of landing and takeoff slots for LaGuardia Airport, for the US Federal Aviation Administration (2005, 2008).

Teaching

| | |
|---------------|--|
| Econ 456 | Law and Economics (Undergraduate; Maryland) |
| Econ 603 | Microeconomic Analysis (Ph.D.; Maryland) |
| Econ 661 | Industrial Organization (Ph.D.; Maryland) |
| Econ 704 | Advanced Microeconomics: Market Design (Ph.D.; Maryland) |
| Mngl Econ D30 | Intermediate Microeconomics (M.B.A.; Northwestern) |
| Mngl Econ D45 | Regulation and Deregulation (M.B.A.; Northwestern) |

Publications

“Revealed Preference and Activity Rules in Dynamic Auctions” (with Oleg Baranov), *International Economic Review*, Vol. 61, No. 2, pp. 471–502, May 2020 [lead article].

“Core-Selecting Auctions with Incomplete Information” (with Oleg Baranov), *International Journal of Game Theory*, Vol. 49, No. 1, pp. 251–273, March 2020.

“An Experiment on Auctions with Endogenous Budget Constraints” (with Justin E. Burkett and Emel Filiz-Ozbay), *Experimental Economics*, Vol. 20, No. 4, pp. 973–1006, December 2017.

“A Practical Guide to the Combinatorial Clock Auction” (with Oleg Baranov), *Economic Journal*, Vol. 127, No. 605 (Feature Issue), pp. F334–F350, October 2017.

“Efficient Procurement Auctions with Increasing Returns” (with Oleg Baranov, Christina Aperjis and Thayer Morrill), *American Economic Journal: Microeconomics*, Vol. 9, No. 3, pp. 1–27, August 2017 [lead article].

“Demand Reduction and Inefficiency in Multi-Unit Auctions” (with Peter Cramton, Marek Pycia, Marzena J. Rostek and Marek Weretka), *Review of Economic Studies*, Vol. 81, No. 4, pp. 1366–1400, October 2014.

“Sequential Kidney Exchange” (with Thayer Morrill), *American Economic Journal: Microeconomics*, Vol. 6, No. 3, pp. 265–285, August 2014.

“Market Design and the Evolution of the Combinatorial Clock Auction” (with Oleg Baranov), *American Economic Review: Papers & Proceedings*, Vol. 104, No. 5, pp. 456–451, May 2014.

- “Common-Value Auctions with Liquidity Needs: An Experimental Test of a Troubled Assets Reverse Auction” (with Peter Cramton, Emel Filiz-Ozbay, Nathaniel Higgins, Erkut Ozbay and Andrew Stocking), Chapter 20 of *Handbook of Market Design* (Nir Vulkan, Alvin E. Roth, and Zvika Neeman, eds.), Oxford University Press, 2013.
- “Non-Judicial Debt Collection and the Consumer’s Choice among Repayment, Bankruptcy and Informal Bankruptcy” (with Amanda E. Dawsey and Richard M. Hynes), *American Bankruptcy Law Journal*, Vol. 87, pp. 1–26, March 2013 [lead article].
- “Virtual Power Plant Auctions” (with Peter Cramton), *Utilities Policy*, Vol. 18, No. 4, pp. 201–208, December 2010.
- “Using Forward Markets to Improve Electricity Market Design” (with Peter Cramton), *Utilities Policy*, Vol. 18, No. 4, pp. 195–200, December 2010.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” *American Economic Review*, Vol. 96, No. 3, pp. 602–629, June 2006.
- “An Efficient Ascending-Bid Auction for Multiple Objects,” *American Economic Review*, Vol. 94, No. 5, pp. 1452–1475, December 2004.
- “Dynamic Auctions in Procurement” (with Peter Cramton), Chapter 9 of *Handbook of Procurement* (N. Dimitri, G. Piga, and G. Spagnolo, eds.), pp. 220–245, Cambridge: Cambridge University Press, 2006.
- “The Lovely but Lonely Vickrey Auction” (with Paul Milgrom), Chapter 1 of *Combinatorial Auctions* (P. Cramton, Y. Shoham, and R. Steinberg, eds.), pp. 17–40, Cambridge: MIT Press, 2006.
- “Ascending Proxy Auctions” (with Paul Milgrom), Chapter 3 of *Combinatorial Auctions* (P. Cramton, Y. Shoham, and R. Steinberg, eds.), pp. 79–98, Cambridge: MIT Press, 2006.
- “The Clock-Proxy Auction: A Practical Combinatorial Auction Design” (with Peter Cramton and Paul Milgrom), Chapter 5 of *Combinatorial Auctions* (P. Cramton, Y. Shoham, and R. Steinberg, eds.), pp. 115–138, Cambridge: MIT Press, 2006.
- “Auctioning Many Divisible Goods” (with Peter C. Cramton), *Journal of the European Economics Association*, Vol. 2, Nos. 2-3, pp. 480–493, April-May 2004.
- “Vickrey Auctions with Reserve Pricing” (with Peter C. Cramton), *Economic Theory*, 23, pp. 493–505, April 2004. Reprinted in Charalambos Aliprantis, et al. (eds.), *Assets, Beliefs, and Equilibria in Economic Dynamics*, Berlin: Springer-Verlag, 355–368, 2003.
- “Auction Theory for the New Economy,” Chapter 6 of *New Economy Handbook* (D. Jones, ed.), San Diego: Academic Press, 2003.
- “Ascending Auctions with Package Bidding” (with Paul Milgrom), *Frontiers of Theoretical Economics*, Vol. 1, No. 1, Article 1, August 2002.
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- “Bargaining with Incomplete Information” (with Peter Cramton and Raymond Deneckere), Chapter 50 of *Handbook of Game Theory* (R. Aumann and S. Hart, eds.), Vol. 3, Amsterdam: Elsevier Science B.V., 2002.
- “Package Bidding: Vickrey vs. Ascending Auctions” (with Paul Milgrom), *Revue Economique*, Vol. 53, No. 3, pp. 391–402, May 2002.
- “Implications of Auction Theory for New Issues Markets,” *Brookings-Wharton Papers on Financial Services*, Vol. 5, pp. 313–343, 2002.
- “Synergies in Wireless Telephony: Evidence from the Broadband PCS Auctions” (with Peter Cramton, R. Preston McAfee, and John McMillan), *Journal of Economics and Management Strategy*, Vol. 6, No. 3, pp. 497–527, Fall 1997.
- “Credit Card Defaults, Credit Card Profits, and Bankruptcy,” *American Bankruptcy Law Journal*, Vol. 71, pp. 249–270, Spring 1997; recipient of the Editor's Prize for the best paper in the American Bankruptcy Law Journal, 1997.
- “Efficient Sequential Bargaining” (with R. Deneckere), *Review of Economic Studies*, Vol. 60, No. 2, pp. 435–461, April 1993.
- “A Generalized Theorem of the Maximum” (with R. Deneckere), *Economic Theory*, Vol. 3, No. 1, pp. 99–107, January 1993.
- “Durable Goods Monopoly with Incomplete Information” (with R. Deneckere), supercedes “Stationary Sequential Equilibria in Bargaining with Two-Sided Incomplete Information,” *Review of Economic Studies*, Vol. 59, No. 4, pp. 795–812, October 1992.
- “Bargaining and the Right to Remain Silent” (with R. Deneckere), *Econometrica*, Vol. 60, No. 3, pp. 597–625, May 1992.
- “The Failure of Competition in the Credit Card Market,” *American Economic Review*, Vol. 81, No. 1, pp. 50–81, March 1991; reprinted as Chapter 21 in *Advances in Behavioral Finance* (D. Thaler, ed.), Russell Sage Foundation, 1993.
- “Insider Trading in a Rational Expectations Economy,” *American Economic Review*, Vol. 80, No. 5, pp. 1022–1041, December 1990.
- “Partially-Revealing Rational Expectations Equilibrium in a Competitive Economy,” *Journal of Economic Theory*, Vol. 50, No. 1, pp. 93–126, February 1990.
- “A Direct Mechanism Characterization of Sequential Bargaining with One-Sided Incomplete Information” (with R. Deneckere), *Journal of Economic Theory*, Vol. 48, No. 1, pp. 18–46, June 1989; reprinted as Chapter 15 in *Bargaining with Incomplete Information* (P. Linhart, R. Radner, and M. Satterthwaite, eds.), Academic Press, 1992.

“Reputation in Bargaining and Durable Goods Monopoly” (with R. Deneckere), *Econometrica*, Vol. 57, No. 3, pp. 511–531, May 1989 [lead article]; reprinted as Chapter 13 in *Bargaining with Incomplete Information* (P. Linhart, R. Radner, and M. Satterthwaite, eds.), Academic Press, 1992.

“One is Almost Enough for Monopoly” (with R. Deneckere), *Rand Journal of Economics*, Vol. 18, No. 2, pp. 255–274, Summer 1987.

Patents

“System and Method for Cryptographic Choice Mechanisms” (with Andrew Komo), U.S. Patent Number 10,872,487, issued December 22, 2020.

“System and Method for an Auction of Multiple Types of Items” (with Peter Cramton and Wynne P. Jones), U.S. Patent Number 8,762,222, issued June 24, 2014.

“System and Method for the Efficient Clearing of Spectrum Encumbrances” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 8,744,924, issued June 3, 2014.

“System and Method for a Dynamic Auction with Package Bidding” (with Paul Milgrom), U.S. Patent Number 8,566,211, issued October 22, 2013.

“System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 8,447,662, issued May 21, 2013.

“System and Method for a Hybrid Clock and Proxy Auction” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 8,335,738, issued December 18, 2012.

“System and Method for a Hybrid Clock and Proxy Auction” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 8,224,743, issued July 17, 2012.

“System and Method for the Efficient Clearing of Spectrum Encumbrances” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 8,145,555, issued March 27, 2012.

“Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 8,065,224, issued November 22, 2011.

“Ascending Bid Auction for Multiple Objects,” U.S. Patent Number 7,966,247, issued June 21, 2011.

“System and Method for an Auction of Multiple Types of Items” (with Peter Cramton and Wynne P. Jones), U.S. Patent Number 7,899,734, issued March 1, 2011.

“System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,870,050, issued January 11, 2011.

“Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 7,774,264, issued August 10, 2010.

“System and Method for a Hybrid Clock and Proxy Auction” (with Peter Cramton and Paul Milgrom), U.S. Patent Number 7,729,975, issued June 1, 2010.

“System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,467,111, issued December 16, 2008.

“System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,343,342, issued March 11, 2008.

“Ascending Bid Auction for Multiple Objects,” U.S. Patent Number 7,337,139, issued February 26, 2008.

“Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 7,249,027, issued July 24, 2007.

“System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,165,046, issued January 16, 2007.

“System and Method for an Efficient Dynamic Multi-Unit Auction,” U.S. Patent Number 7,062,461, issued June 13, 2006.

“System and Method for an Efficient Dynamic Auction for Multiple Objects,” U.S. Patent Number 6,026,383, issued February 15, 2000.

“Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 6,021,398, issued February 1, 2000.

“Computer Implemented Methods and Apparatus for Auctions,” U.S. Patent Number 5,905,975, issued May 18, 1999.

Book Reviews and Encyclopedia Entries

“Auction Theory,” *New Palgrave Dictionary of Economics*, Second Edition, Steven N. Durlauf and Lawrence E. Blume, eds., London: Macmillan, 2008.

“Credit Cards,” *McGraw-Hill Encyclopedia of Economics*, McGraw-Hill, 1994.

“Book Review: The Credit Card Industry, by Lewis Mandell,” *Journal of Economic Literature*, Vol. 30, No. 3, September 1992, pp. 1517-18.

“Credit Cards,” *New Palgrave Dictionary of Money and Finance*, Stockton Press, 1992.

Working Papers

“Market Design and the FCC Incentive Auction” (with Christina Aperjis and Oleg V. Baranov), October 2017.

- “The Combinatorial Clock Auction, Revealed Preference and Iterative Pricing” (with Oleg V. Baranov), February 2014.
- “Penalty Interest Rates, Universal Default, and the Common Pool Problem of Credit Card Debt” (with Oleg V. Baranov and Amanda E. Dawsey), mimeo, University of Maryland, June 2010.
- “A Troubled Asset Reverse Auction” (with Peter Cramton), working paper, University of Maryland, October 2008.
- “Time Inconsistency in the Credit Card Market” (with Haiyan Shui), mimeo, University of Maryland, January 2005.
- “Informal Bankruptcy” (with Amanda E. Dawsey), mimeo, University of Maryland, April 2004.
- “Adverse Selection in the Credit Card Market,” mimeo, University of Maryland, June 1999.
- “The Credit Card Market, Revisited,” mimeo, University of Maryland, July 1995.
- “Walrasian Tâtonnement for Discrete Goods,” mimeo, University of Maryland, July 2005.
- “Bidder Participation and Information in Currency Auctions” (with Rafael Romeu), Working Paper WP/05/157, International Monetary Fund, 2005.
- “A Mechanism Generalizing the Vickrey Auction,” mimeo, University of Maryland, September 1999.
- “The Ascending Auction Paradox” (with Jesse Schwartz), mimeo, University of Maryland, July 1999.
- “The Optimality of Being Efficient” (with Peter Cramton), mimeo, University of Maryland, June 1999.
- “Sequential Recontracting Under Incomplete Information” (with Arijit Sen), mimeo, University of Maryland, June 1995.
- “Separation and Delay in Bargaining” (with Raymond Deneckere), mimeo, University of Maryland, April 1994.
- “A Model of Managerial Discretion and Corporate Takeovers,” mimeo, University of Maryland, March 1993.
- “Rigidity and Asymmetric Adjustment of Bank Interest Rates,” mimeo, University of Maryland, August 1992.
- “Oligopoly When Market Share Matters,” mimeo, Stanford University, May 1984.

“Partially-Revealing Equilibria,” Stanford University, Department of Economics, August 1984. Dissertation committee: Mordecai Kurz (principal advisor); Peter J. Hammond; Kenneth J. Arrow.

Works in Progress

“The Hungarian Auction” (with T. Morrill)

“Bargaining and Forward Induction” (with R. Deneckere)

Op-Eds

“Making Sense of the Aggregator Bank” (with Peter Cramton), *Economists’ Voice*, Vol. 6, Issue 3, Article 2, February 2009.

“No Substitute for the ‘P’-Word in Financial Rescue” (with Peter Cramton), *Economists’ Voice*, Vol. 6, Issue 2, Article 2, February 2009.

“Auction Design Critical for Rescue Plan” (with Peter Cramton), *Economists’ Voice*, Vol. 5, Issue 5, Article 5, September 2008.

Research Grants

Principal Investigator, “Common-Value Auctions with Liquidity Needs” (with P. Cramton, E. Filiz-Ozbay and E. Ozbay), National Science Foundation Grant SES-09-24773, September 1, 2009 – August 31, 2013.

Principal Investigator, “Dynamic Matching Mechanisms” (with P. Cramton), National Science Foundation Grant SES-05-31254, August 15, 2005 – July 31, 2008.

Co-Principal Investigator, “Slot Auctions for U.S. Airports” (with M. Ball, P. Cramton and D. Lovell), Federal Aviation Administration, September 1, 2004 – August 31, 2005.

Co-Principal Investigator, “Rapid Response Electronic Markets for Time-Sensitive Goods” (with G. Anandalingam, P. Cramton, H. Lucas, M. Ball and V. Subrahmanian), National Science Foundation Grant IIS-02-05489, Aug 1, 2002 – July 31, 2005.

Principal Investigator, “Multiple Item Auctions” (with P. Cramton), National Science Foundation Grant SES-01-12906, July 15, 2001 – June 30, 2004.

Principal Investigator, “Auctions for Multiple Items” (with P. Cramton), National Science Foundation Grant SBR-97-31025, April 1, 1998 – March 31, 2001.

Co-Principal Investigator, “Auctions and Infrastructure Conference” (with P. Cramton), National Science Foundation, April 1, 1998 – March 31, 1999.

Principal Investigator, “Bargaining Power, Sequential Recontracting, and the Principal-Agent Problem” (with A. Sen), National Science Foundation Grant SBR-94-10545, October 15, 1994 – September 30, 1997.

Principal Investigator, “Insider Trading and Economic Efficiency,” The Lynde and Harry Bradley Foundation, May 15, 1989 – May 14, 1992.

Principal Investigator, “Bargaining with One- and Two-Sided Incomplete Information” (with R. Deneckere), National Science Foundation Grant SES-86-19012, June 1, 1987 – May 31, 1989.

Principal Investigator, “Information Transmission in Bargaining and Markets” (with R. Deneckere), National Science Foundation Grant IST-86-09129, July 1, 1986 – June 30, 1987.

Conference Presentations

“On Generalizing the English Auction,” Econometric Society Winter Meetings, Chicago, January 1998.

“The Optimality of Being Efficient,” Maryland Auction Conference, Wye River, May 1998.

“Adverse Selection in the Credit Card Market,” Western Finance Association, Monterey, June 1998.

“The Optimality of Being Efficient,” Econometric Society Summer Meetings, Montreal, June 1998.

“Bargaining and Forward Induction,” Northwestern Summer Microeconomics Conference, Evanston, IL, July 1998.

“Predicting Personal Bankruptcies,” National Conference of Bankruptcy Judges, Dallas, October 1998.

“Adverse Selection in the Credit Card Market,” NBER Behavioral Macroeconomics Conference, Boston, December 1998.

“The Ascending Auction Paradox,” Econometric Society Summer Meetings, Madison, June 1999.

“Adverse Selection in the Credit Card Market,” Econometric Society Summer Meetings, Madison, June 1999.

“Predicting Personal Bankruptcies,” Meeting of the National Association of Chapter Thirteen Trustees, New York, July 1999.

“The Ascending Auction Paradox,” Southeast Economic Theory Conference, Washington DC, November 1999.

- “Adverse Selection in the Credit Card Market,” Utah Winter Finance Conference, Salt Lake City, February 2000.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” Conference on Auctions and Market Structure, Heidelberg, Germany, July 2000.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” Conference on Multiunit Auctions, Stony Brook, NY, July 2000.
- “A Mechanism Generalizing the Vickrey Auction,” Econometric Society World Congress, Seattle, August 2000.
- “Auctions for Financial E-Commerce,” New York Federal Reserve Bank Conference on Financial E-Commerce, New York, February 2001.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” NSF General Equilibrium Conference, Providence, RI, April 2001.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” NSF/NBER Decentralization Conference, Evanston, IL, April 2001.
- “Informal Bankruptcy,” Association of American Law Schools Workshop on Bankruptcy, St. Louis, MO, May 2001.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” Econometric Society Summer Meetings, College Park, MD, June 2001.
- “Ascending Auctions with Package Bidding,” FCC, SIEPR and NSF Conference on Combinatorial Auctions, Wye River, MD, October 2001.
- “The Electricité de France Generation Capacity Auctions,” CORE-ECARES-LEA Workshop on Auctions, Brussels, Belgium, November 2001.
- “Informal Bankruptcy,” Utah Winter Finance Conference, Salt Lake City, February 2002.
- “Defictionalizing the Walrasian Auctioneer,” Conference on Market Design in Honor of Robert Wilson, Stanford, CA, May 2002.
- “Adverse Selection in the Credit Card Market,” Conference on the Economics of Payment Networks, Toulouse, France, June 2002.
- “Ascending Auctions with Package Bidding,” Econometric Society Summer Meetings, Los Angeles, June 2002.
- “An Efficient Dynamic Auction for Heterogeneous Commodities,” Conference in Honor of Mordecai Kurz, Stanford, CA, August 2002.

- “Adverse Selection in the Credit Card Market,” Conference on Credit, Trust and Calculation, San Diego, November 2002.
- “Package Bidding for Spectrum Auctions,” American Economic Association Meetings, Washington, DC, January 2003.
- “Auctioning Many Divisible Goods,” invited session, European Economic Association Annual Congress, Stockholm, August 2003.
- “Spectrum Auctions with Package Bidding,” TPRC Research Conference on Communication, Information and Internet Policy, Arlington, VA, September 2003.
- “Defictionalizing the Walrasian Auctioneer,” invited lecture, Conference on Auctions and Market Design: Theory, Evidence and Applications, Fondazione Eni Enrico Mattei, Milan, September 2003.
- “Clock Auctions, Proxy Auctions, and Possible Hybrids,” Workshop on Auction Theory and Practice, Pittsburgh, PA, November 2003.
- “Clock Auctions, Proxy Auctions, and Possible Hybrids,” FCC Combinatorial Bidding Conference, Wye River, MD, November 2003.
- “Time Inconsistency in the Credit Card Market,” Utah Winter Finance Conference, Salt Lake City, February 2004.
- “The Clock-Proxy Auction: A Practical Combinatorial Auction Design,” Conference on Auctions and Market Design: Theory, Evidence and Applications, Consip, Rome, Italy, September 2004.
- “Bidder Participation and Information in Currency Auctions,” Conference on Auctions and Market Design: Theory, Evidence and Applications, Consip, Rome, Italy, September 2004.
- “The Clock-Proxy Auction: A Practical Combinatorial Auction Design,” Market Design Conference, Stanford University, December 2004.
- “Dynamic Matching Mechanisms,” Econometric Society World Congress, London, August 2005.
- “The Clock-Proxy Auction, with Recent Applications,” SISL Workshop, Caltech, October 2005.
- “Dynamic Matching Mechanisms,” Conference on Matching and Two-Sided Markets, University of Bonn, May 2006.
- “The Hungarian Auction,” DIMACS Workshop on Auctions with Transaction Costs, Rutgers University, March 2007.
- “The Hungarian Auction,” PSE Lecture at the Paris School of Economics, June 2007.

- “Time Inconsistency in the Credit Card Market,” John M. Olin Conference on Law and Economics of Consumer Credit, University of Virginia, February 2008.
- “The Hungarian Auction,” 6th Annual International Industrial Organization Conference, Arlington, VA, May 2008.
- “The Hungarian Auction,” Frontiers of Microeconomic Theory and Policy, Symposium in Honour of Ray Rees, University of Munich, July 2008.
- “Common-Value Auctions with Liquidity Needs: An Experimental Test of a Troubled Assets Reverse Auction,” 2009 CAPCP Conference on Auctions and Procurement, Penn State University, March 2009.
- “Market Design for Troubled Assets,” NBER Workshop on Market Design, Cambridge, MA, May 2009.
- “Market Design for Troubled Assets,” Madrid Summer Workshop on Economic Theory, Universidad Carlos III de Madrid, June 2009.
- “Virtual Power Plant Auctions,” (with Peter Cramton), Workshop: Designing Electricity Auctions, Research Institute of Industrial Economics, Stockholm, Sweden, September 2009.
- “Using Forward Markets to Improve Electricity Market Design,” (with Peter Cramton), Workshop: Designing Electricity Auctions, Research Institute of Industrial Economics, Stockholm, Sweden, September 2009.
- “Virtual Power Plant Auctions,” (with Peter Cramton), Market Design 2009 Conference, Stockholm, Sweden, September 2009.
- “Using Forward Markets to Improve Electricity Market Design,” (with Peter Cramton), Market Design 2009 Conference, Stockholm, Sweden, September 2009.
- “Auctions with Multiple Objects,” 2009 Erwin Plein Nemmers Prize in Economics, Conference in Honor of Paul Milgrom, Northwestern University, November 2009.
- “Penalty Interest Rates, Universal Default, and the Common Pool Problem of Credit Card Debt” (with Oleg V. Baranov and Amanda E. Dawsey), Credit, Default and Bankruptcy Conference, University of California - Santa Barbara, June 2010.
- “Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), World Congress of the Econometric Society, Shanghai, China, August 2010.
- “Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), NBER Workshop on Market Design, Cambridge, MA, October 2010.
- “Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), NSF/CEME Decentralization Conference, Ohio State University, April 2011

- “Penalty Interest Rates, Universal Default, and the Common Pool Problem of Credit Card Debt” (with Oleg V. Baranov and Amanda E. Dawsey), Centre for Financial Analysis & Policy Conference on Consumer Credit and Bankruptcy, University of Cambridge, UK, April 2011.
- “Core-Selecting Auctions with Incomplete Information” (with Oleg V. Baranov), Center for the Study of Auctions, Procurements and Competition Policy Conference, Penn State University, April 2011.
- “Design Issues for Combinatorial Clock Auctions” (with Oleg V. Baranov), Annual Meeting of the Institute for Operations Research and the Management Sciences (INFORMS), Phoenix AZ, October 2012.
- “An Enhanced Combinatorial Clock Auction” (with Oleg V. Baranov), SIEPR Conference on the FCC Incentive Auctions, Stanford University, February 2013.
- “Enhancing the Combinatorial Clock Auction” (with Oleg V. Baranov), Ofcom Conference, Combinatorial Auctions for Spectrum, London School of Economics, September 2013.
- “The Combinatorial Clock Auction, Revealed Preference and Iterative Pricing” (with Oleg V. Baranov), NBER Workshop on Market Design, Stanford University, October 2013.
- “Market Design and the Evolution of the Combinatorial Clock Auction” (with Oleg V. Baranov), invited session in honor of the Nobel Prize in Economics awarded to Market Design, American Economic Association meetings, Philadelphia, January 2014.
- “Revealed Preference in Bidding: Empirical Evidence from Recent Spectrum Auctions” (with Oleg V. Baranov), NBER Market Design Conference, Palo Alto, CA, June 2014.
- “Enhancing the Combinatorial Clock Auction” (with Oleg V. Baranov), Industry Canada Retrospective on the Canadian 700 MHz Spectrum Auction, Ottawa, Canada, November 2014.
- “Efficient Procurement Auctions with Increasing Returns” (with Oleg V. Baranov, Christina Aperjis and Thayer Morrill), Annual Meeting of the Institute for Operations Research and the Management Sciences (INFORMS), Philadelphia PA, November 2015.
- “Efficient Procurement Auctions with Increasing Returns” (with Oleg V. Baranov, Christina Aperjis and Thayer Morrill), Workshop on Auction Design, University of Vienna, August 2016.
- “Vickrey-Based Pricing in Iterative First-Price Auctions” (with Oleg V. Baranov), Workshop on Auction Design, University of Vienna, August 2016.
- “Efficient Procurement Auctions with Increasing Returns” (with Oleg V. Baranov, Christina Aperjis and Thayer Morrill), NBER Market Design Conference, Palo Alto, CA, October 2016.

- “Market Design and the FCC Incentive Auction” (with Christina Aperjis and Oleg V. Baranov), Tenth Bi-Annual Conference on Economic Design,, York, UK, June 2017.
- “Market Design and the FCC Incentive Auction” (with Christina Aperjis and Oleg V. Baranov), NBER Market Design Conference, Cambridge, MA, October 2017.
- “Market Design and the FCC Incentive Auction” (with Christina Aperjis and Oleg V. Baranov), New Perspectives on Spectrum Policy Workshop, U Penn Law School, April 2018.
- “Revealed Preference and Activity Rules in Auctions” (with Oleg V. Baranov), keynote talk, York Annual Symposium on Game Theory 2018, York, UK, June 2018.
- “Market Design and the FCC Incentive Auction” (with Christina Aperjis and Oleg V. Baranov), INFORMS Workshop on Mathematical Optimization in Market Design, Ithaca, NY, June 2018.
- “Market Design and the FCC Incentive Auction” (with Christina Aperjis and Oleg V. Baranov), European Economic Association Annual Congress, Cologne, August 2018.
- “Revealed Preference and Activity Rules in Auctions” (with Oleg Baranov), Society of Economic Design, Budapest, June 2019.
- “VCG, the Core, and Assignment Stages in Auctions” (with Oleg Baranov), Society of Economic Design, Budapest, June 2019.
- “Supply Reduction in the Broadcast Incentive Auction,” (with Christina Aperjis and Oleg Baranov), NBER Market Design Conference, Cambridge, MA, October 2019.
- “Supply Reduction in the Broadcast Incentive Auction,” (with Christina Aperjis and Oleg Baranov), Econometric Society World Congress, Virtual Milan, August 2020.
- “Supply Reduction in the Broadcast Incentive Auction,” (with Christina Aperjis and Oleg Baranov), INFORMS Annual Meeting, Virtual Washington DC, November 2020.

Professional Service

- Mentored the National Winner of the 2017-18 Siemens Competition in Math, Science and Technology (Andrew Komo of Bethesda, MD).
- Member of working group for the design and implementation of the broadcast incentive auction for the US Federal Communications Commission, 2011–2017.
- Bureau of Ocean Energy Management, US Department of Interior, for the design and implementation of offshore wind energy auctions, 2012–present.
- Advisor to Innovation, Science and Economic Development Canada for the design and implementation of 600 MHz, 700 MHz and 2.5 GHz spectrum auctions, 2011 – present.

Advisor to the Australian Communications and Media Authority for the design and implementation of the Australian Digital Dividend Auction and future spectrum auctions, 2011 – present.

Congressional Briefing on “How Fundamental Economic Research Improves People’s Lives,” Rayburn House Office Building, March 2010.

Testified before the Committee on Banking, Housing and Urban Affairs of the US Senate, Hearing on “Modernizing Consumer Protection in the Financial Regulatory System: Strengthening Credit Card Protections,” February 12, 2009.

Testified before the Subcommittee on Financial Institutions and Consumer Credit of the US House of Representatives, Hearing on “The Credit Cardholders’ Bill of Rights: Providing New Protections for Consumers,” March 13, 2008.

Member, National Science Foundation Economics Panel, 2004 – 2005.

Associate Editor, *Berkeley Electronic Journals of Theoretical Economics*, 2004 – present.

Guest Associate Editor, *Management Science*, issue on Electronic Auctions, 2003.

Program Chair of the 2001 North American Summer Meeting of the Econometric Society (with Peter Cramton), University of Maryland, June 21–24, 2001.

Program Committee of the North American Summer Meeting of the Econometric Society, UCLA, June 2002, and University of Pennsylvania, June 1991.

Organized Maryland Auction Conference (with Peter Cramton), Wye River Conference Center, May 1998, sponsored by the National Science Foundation, the World Bank, and the University of Maryland.

Spoke at a Forum on Bankruptcy of the Financial Services Committee of the United States House of Representatives, February 28, 2001.

Testified before the Subcommittee on Commercial and Administrative Law of the United States House of Representatives, Hearing on the Consumer Bankruptcy Issues in the Bankruptcy Reform Act of 1998, March 10, 1998.

Testified before the Subcommittee on Financial Institutions and Regulatory Relief of the United States Senate, Hearing on Bankruptcy Reform, February 11, 1998.

Testified before the National Bankruptcy Review Commission, January 1997.

Referee for: *American Economic Review*, *Econometrica*, *European Economic Review*, *Games and Economic Behavior*, *International Journal of Game Theory*, *International Journal of Industrial Organization*, *Journal of Banking and Finance*, *Journal of Business*, *Journal of Economic Theory*, *Journal of Financial Intermediation*, *Journal of Political Economy*, *Quarterly Journal of Economics*, *Rand Journal of Economics*, *Review of Economic Studies*, and the National Science Foundation.

Professional Organizations

American Economic Association
Econometric Society
INFORMS

Attachment E

New England Governors, State Utility Regulators and Related Agencies

Connecticut

The Honorable Ned Lamont
Office of the Governor
State Capitol
210 Capitol Ave.
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Connecticut Attorney General Office
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Hartford, CT 06106
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Robert.Marconi@ct.gov

Connecticut Department of Energy and
Environmental Protection
79 Elm Street
Hartford, CT 06106
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Connecticut Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051-2605
michael.coyle@ct.gov

Maine

The Honorable Janet Mills
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Maine Public Utilities Commission
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Massachusetts

The Honorable Charles Baker
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Massachusetts Attorney General Office
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Massachusetts Department of Public Utilities
One South Station
Boston, MA 02110
Nancy.Stevens@state.ma.us
morgane.treanton@state.ma.us
Lindsay.griffin@mass.gov

New Hampshire

The Honorable Chris Sununu
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Rhode Island

The Honorable Gina Raimondo
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82 Smith Street
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Rosemary.powers@governor.ri.gov
christopher.kearns@energy.ri.gov
nicholas.ucci@energy.ri.gov

New England Governors, State Utility Regulators and Related Agencies

Rhode Island Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888
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Meredith Hatfield, Executive Director
New England Conference of Public Utilities
Commissioners
72 N. Main Street
Concord, NH 03301
mhatfield@necpuc.org

Vermont

The Honorable Phil Scott
Office of the Governor
109 State Street, Pavilion
Montpelier, VT 05609
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Anthony Roisman, President
New England Conference of Public Utilities
Commissioners
112 State Street – Drawer 20
Montpelier, VT 05620
anthony.roisman@vermont.gov

Vermont Public Utility Commission
112 State Street
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sarah.hofmann@vermont.gov
Margaret.cheney@vermont.gov

Vermont Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601
bill.jordan@vermont.gov
june.tierney@vermont.gov
Ed.McNamara@vermont.gov

New England Governors, Utility Regulatory and Related Agencies

Jay Lucey
Coalition of Northeastern Governors
400 North Capitol Street, NW, Suite 370
Washington, DC 20001
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Heather Hunt, Executive Director
New England States Committee on Electricity
655 Longmeadow Street
Longmeadow, MA 01106
HeatherHunt@nescoe.com
JasonMarshall@nescoe.com