APPENDIX O:
INITIAL SCENARIO ANALYSIS

Contents

List of Figures and Tables

INTRODUCTION

Not all of the scenarios and sensitivity studies analyzed during the development of the draft Seventh Power Plan were updated or revised for the final Seventh Power Plan. However, the results of the draft plan's scenario analysis did inform the resource strategy and actions included in the final Seventh Power Plan. This appendix describes all of the scenarios and sensitivity studies analyzed for the draft plan. It also discusses their principal findings and implications for the major elements of the Seventh Power Plan's resource strategy. All of the findings in this appendix appeared in either Chapter 3 or Chapter 15 of the draft Seventh Power Plan. These chapters have been edited to reduce the overlap between those chapters while retaining major findings.

SCENARIO ANALYSIS

The Seventh Power Plan's resource strategy is based on analysis of over 20 scenarios and sensitivity studies. Scenarios combined elements of the future that the region controls, such as the type, amount and timing of resource development, with factors the region does not control, such as natural gas and wholesale market electricity prices. Sensitivity studies alter one parameter in a scenario to test the how the least-cost resource strategy is affected by that input assumption. For example, several scenarios were run with and without future carbon cost to assess the impact of that input assumption on the various components of the least cost resource strategy.

All of the scenarios evaluated for the plan include the same range of uncertainty regarding future fuel prices, hydropower conditions, electricity market prices, capital costs, and load growth. However, several scenarios were specifically designed to provide insights into the cost and impacts of alternative carbon dioxide emissions reduction policies. These included either the federal government's estimates of the societal damage cost of carbon dioxide emissions or the economic risk associated with future carbon dioxide regulation or pricing or "non-pricing" policies. Each of these scenarios assumed differing levels of carbon dioxide damage or regulatory cost. Also, as noted above, several sensitivity studies were conducted to assess the impact of such factors as the near term pace of conservation development, lower natural gas and wholesale electricity prices, greater reliance on external markets, or the loss of major resources.

Each scenario and sensitivity analysis tested thousands of potential resource strategies against 800 alternative future conditions to identify the least cost and lowest economic risk resource portfolios. Since the discussion of the elements of the resource strategy draws on those scenarios and sensitivity studies, an introduction to the scenarios and studies and their findings is needed. Each scenario or sensitivity study was designed to explore specific components of resource strategies (e.g. strategies with and without demand response). Therefore, the following discussion of findings compares different combinations of scenarios and sensitivity studies. That is, not all scenarios or sensitivity studies "stress test" the same element of a resource strategy, so not all provide useful insight regarding that element.

Scenarios Requiring Updates to Input Assumptions

To fully consider and respond to the comments received, the Council chose to update seven of the twenty-one scenario analyses and sensitivity studies it conducted for the draft plan with revised input assumptions based on public comment. The updated results of these seven scenarios and of the three additional scenarios suggested by public comment appear in Chapters 3 and 15. The scenarios results discussed in this appendix are those presented in the draft Seventh Power Plan.

TESTING RESOURCE STRATEGIES

Resource Strategy Definition

A resource strategy is a plan on how to acquire resources. It includes two decision points for a utility. When a utility planner needs to start planning for a resource and when a utility needs to start the construction of a resource. Because of uncertainty about the future, it makes sense to have circumstances where a utility would plan for a resource but choose not to construct it. Thus, each of these decisions must be treated distinctly.

A scenario is a different set of assumptions about future conditions. Scenarios can examine things such as the effect of enacting new legislation on the region's power system or the effect of market regime changes on the power system. Generally, resource strategies reflect decisions that can be made by utilities, whereas scenarios reflect circumstances beyond the control of a utility. A resource strategy is considered *robust* if it exhibits both *low cost* and *low risk* across many different scenarios.

The Regional Portfolio Model

The Regional Portfolio Model (RPM) is used to estimate the system costs of a resource strategy under a given scenario. The RPM is described exhaustively in Appendix L. The RPM tests a wide range of resource strategies including the amount of conservation developed, the amount of demand response optioned and the amount of thermal and renewable resources optioned across 800 potential futures. For each of the 800 potential futures examined, the RPM estimates capital costs for constructing new resources and operating costs of new and existing resources, as described in the previous section of this chapter. Each future then results in an estimate of the system costs.

One of the characteristics of a least-cost resource strategy in the RPM is that options for new generation and DR that are not built in at least one of the 800 futures are removed. That is, it is assumed that these options were not established until there was at least some probability that they would be exercised. Therefore, least cost resource strategies identified in the RPM recommend that options be taken at specific times in the future. In all scenarios examined and for all resources considered, having open options at every opportunity (i.e. continuous optioning) is more expensive. Maintaining these options strictly for crucial times should be a less costly approach for regional utilities to meet the needs of their system.

Resource strategies that minimize both cost and risk are considered optimal for a scenario. The RPM minimizes system cost by seeking resource strategies that reduce the average of the 800 future system cost estimates. The model minimizes system risk by seeking resource strategies that

minimize the average of the 80 most expensive future system cost estimates. In this case "optimal" is limited to a comparison of the range of strategies tested by the RPM. Because of the complexity of the system cost calculation in the RPM, it is impossible to guarantee an optimal result without calculating every possible resource strategy. Modern computers are not yet powerful enough to complete this level of calculation in a reasonable amount of time. Instead some enhanced methods of searching through the resource strategies were used. Further discussion of this is found in Appendix L.

Uncertainty in System Costs

As described in the previous section, each resource strategy results in a distribution of system costs. These distributions highlight the fact that future system costs are unknown. Figure O - 1 illustrates the cost distributions for two different strategies and Figure O - 2 gives an example of the system cost distribution for several different scenarios, which will be detailed later in this chapter.

Figure O - 1: How to Interpret Probability Distribution Graphs

Higher values show more likely outcomes

Probability

Outcome (e.g. Net System Cost)

Higher values show more extreme outcomes
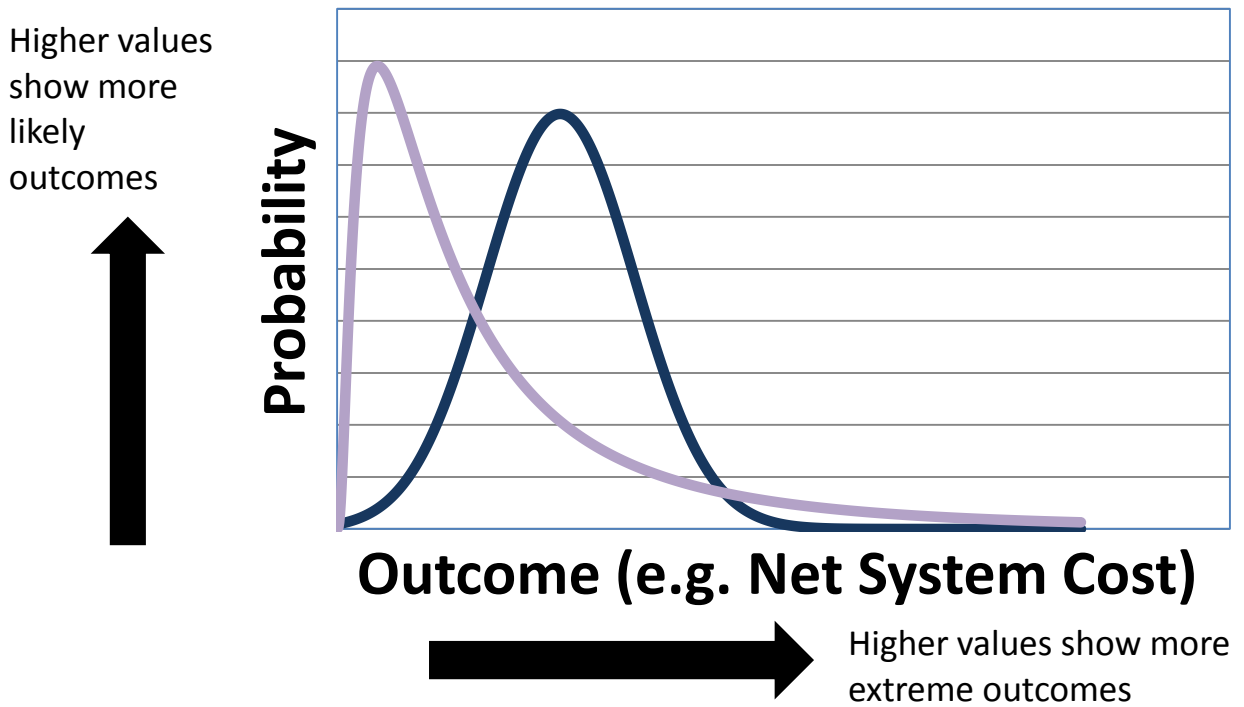
Figure O - 2: Distribution of System Costs Example

Probability

Net System Cost (Billions 2012 $)

47 74 87 94 107 116 126 142 172 243

Scenario
Existing Policy
Low Gas
Max CO2 Reduction
SCC Base Case
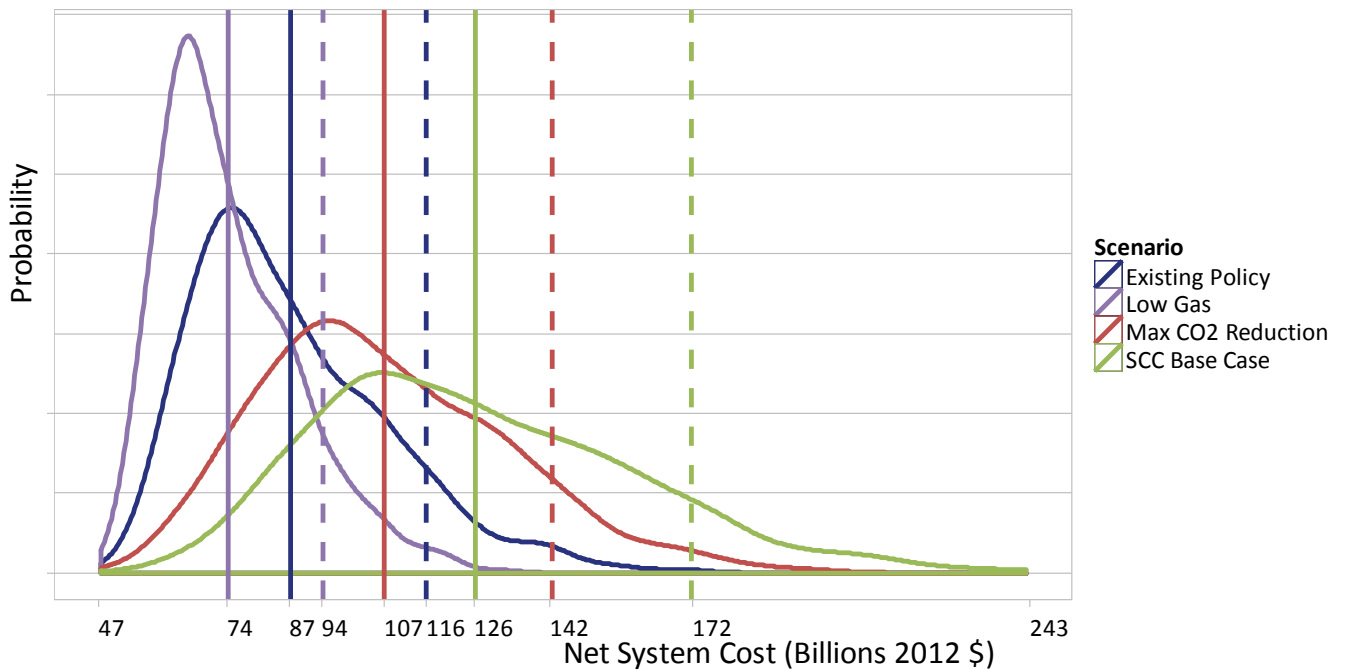
When testing resource strategies, the uncertainty represented by the cost distribution associated with a scenario helps describe the impact of a scenario. How the impact is interpreted depends on the scenario. For example, in a scenario where low gas prices are assumed to persist throughout the study the power system costs are much lower than a scenario that assumes broader range of future gas prices. However, while the lower cost in this scenario would likely be a boon for the consumers of electricity, the least cost resource strategy for this scenario might be highly dependent upon future conditions that are outside of the control of the Northwest. In contrast, under a scenario which assumes retirements of generating resources, regional decision-makers can implement a least cost resource strategy that might include more conservation, options for demand response and construction of new thermal generators. Therefore, when there is uncertainty in future system cost it is important to understand the sources of that uncertainty and specifically whether options to mitigate that cost risk are within the control of the region. The resource strategy described in Chapter 3 was developed by considering these criteria.

Resource Strategy Adequacy

A detailed description of how the Council's resource adequacy standard is implemented in the Regional Portfolio Model is provided in Chapter 11. The RPM tests a resource strategy for adequacy by testing whether its resources meet a minimum build requirement for both energy and capacity adequacy standards. In the event that the strategy does not have sufficient resource to meet adequacy standards, a cost penalty is assessed. Further, if the deficiency in resources leads to a load curtailment during the dispatch of resources, a further cost penalty is assessed. When the RPM looks for an optimal (i.e., low cost, low risk) resource strategy, the cost penalty is part of that calculation. The cost penalty is set around $6 million per quarter in real 2012 dollars. This cost penalty is added to the system cost per peak megawatt or average megawatt for capacity and energy inadequacies. The amount of the cost penalty imposed was selected to make being inadequate more expensive than the development of any of the resource options for a single quarter. The penalty for load curtailment is $10,000 per megawatt-hour curtailed (2012$). A more detailed description of how resource adequacy is modeled in RPM appears in Appendix L.

When system costs are reported they do not include the cost penalty. This is because the cost penalty is simply a mechanism used in the RPM to ensure sufficient resources are development to satisfy the regional adequacy standards, rather than an actual cost that must be recovered in utility revenue requirements.

In the Seventh Plan all least cost resource strategies must also provide similar levels of reliability. As a result, the least-cost resource strategy identified by the RPM is often the same or very similar to the least-risk resource strategy. That is, because the resource adequacy cost penalties make it very expensive to pursue a high risk strategy, minimizing economic risk is not much different that minimizing cost. For all scenarios where optimization was run on minimizing cost and then on minimizing economic risk, no significant differences were present. In the Sixth Power Plan, there was extensive discussion about a trade-off between cost and economic risk in resource strategies. This is well-founded portfolio theory, which described the dynamics of the economics of the power system at that time. Currently, the RPM does not show significant trade-offs for strategies that meet adequacy criteria. However, future technologies or market conditions may change this dynamic. Part

of analyzing resource strategies for future plans will be determining if there is significant difference between minimizing cost and minimizing risk and describing what factors drive the difference, if any.

DEVELOPING SCENARIOS

Testing resource strategies over many potential futures helps determine if those strategies are cost-effective including consideration of potential future risks. One concern in assessing these risks is that the estimated range of these risks does not have an appropriate assessment of the likelihood of a specific future condition occurring. While many of the methods have underlying models that assign a probability or likelihood to a potential future condition, developing scenarios helps test if resource strategies are robust under different future conditions. For a more detailed description of the underlying likelihood models or distributional assumptions used in developing the futures see Appendix L. The rationale for selecting the scenarios tested in the development of the Seventh Power Plan and general description of these scenarios appears in Chapter 3. This section describes how these scenarios were characterized in the RPM.

Scenarios without Carbon Costs

Existing Policy

In this scenario, the price associated with CO_2 emissions was set to zero. This scenario tested resource strategies that have no consideration for CO_2 emission cost or risk. However, it does reflect the impact of existing state laws and regulations. For example, due to existing state regulations in Oregon, Washington and Montana that limit CO_2 emissions from new power generation facilities, new coal plants were not considered for development in the Seventh Plan. State Renewable Portfolio Standards were also reflected in this scenario. This scenario did not explicitly consider the Environmental Protection Agency's limits on CO_2 emissions from new and existing power generation. All other uncertainties (e.g., gas and electricity market prices, load growth) were included.

Maximum Carbon Reduction - Existing Technology

This scenario was modeled by retiring all existing coal plants serving regional load by 2026 and retiring all existing natural gas plants serving regional load with heat rates greater than 8,500 Btu/kWh by 2031. Only the first six blocks of conservation resources described in Chapter 12 were available for development. The levelized cost of utility scale solar PV resources was assumed to decline by 19 percent by 2030.

Maximum Carbon Reduction - Emerging Technology

This scenario was modeled by retiring all existing coal plants serving regional load by 2026 and retiring all existing natural gas plants serving regional load with heat rates greater than 8,500 Btu/kWh by 2031. However, unlike the prior scenario, no new natural gas-fired generation was available for development. All seven blocks of conservation resources, plus 1100 average megawatts of emerging energy efficiency technologies were made available for development. In addition, distributed solar PV technology in both the residential and commercial sectors was

considered for development. Although costs were not considered in this scenario, the levelized cost of utility scale solar PV were assumed to decline by 28 percent by 2030. This assumption increased the maximum availability of this resource. The emerging generating technologies considered are described in Chapter 11 and the emerging energy efficiency technologies considered are described in Chapter 12.

Regional 35 Percent RPS

This scenario involves applying the RPS requirements to all regional loads and increasing that requirement to 35 percent by 2027. This was ramped in for both the percentage of load (net of conservation) to which it applied and the level of RPS. Table O - 1 shows the RPS requirement assumptions by state and Table O - 2 shows the percentage of load in each of the four states to which the RPS was applied. Both of these were designed to reach the full RPS requirements by 2027 so the three year average of CO_2 emissions in 2030 would reflect the full RPS achievement. The annual requirements only reflect potential incremental changes to get from current conditions to the 35 percent renewable generation for 100 percent of the load in each state.

Table O - 1: RPS Requirement Scenario Assumptions

Simulation CY	MT	OR	WA	ID
2015	15%	15%	3%	0%
2016	17%	17%	9%	3%
2017	18%	18%	11%	6%
2018	20%	20%	14%	9%
2019	22%	22%	16%	12%
2020	23%	23%	18%	15%
2021	25%	25%	21%	18%
2022	27%	27%	23%	20%
2023	28%	28%	26%	23%
2024	30%	30%	28%	26%
2025	32%	32%	30%	29%
2026	33%	33%	33%	32%
2027 to 2035	35%	35%	35%	35%

Table O - 2: Percent of Obligated Load Assumptions

Simulation CY	MT	OR	WA	ID
2015	56%	71%	76%	0%
2016	60%	73%	78%	8%
2017	63%	76%	80%	17%
2018	67%	78%	82%	25%
2019	71%	81%	84%	33%
2020	74%	83%	86%	42%
2021	78%	86%	88%	50%
2022	82%	88%	90%	58%
2023	85%	90%	92%	67%
2024	89%	93%	94%	75%
2025	93%	95%	96%	83%
2026	96%	98%	98%	92%
2027 to 2035	100%	100%	100%	100%

No Demand Response - No Carbon Cost

For this scenario, the resource strategies were restricted so that they could not select demand response resources as options. For a description of the optioning logic in the RPM see the earlier section in this chapter on estimating the cost of new generating resources and demand response.

Low Fuel and Market Prices - No Carbon Cost

This scenario explores the implications of extremely low natural gas prices and the corresponding impacts on other fuel and electricity prices. This includes a reduction in coal prices, for example the price for coal in Montana start around $0.03 less per MMBTU in this scenario and by 2035 are around $0.17 less in real 2012 dollars. The range of natural gas prices is based on re-centering the prices around the low forecast range as described in Chapter 8. The resulting range of natural gas prices can be seen in Figure O - 3. The electricity prices used in examining the resource strategies under this scenario are then centered around an electricity price forecast based on this low natural gas price forecast and the resulting range of electricity prices for importing or exporting power generation can be seen in Figure O - 4.

Figure O - 3: Range of Natural Gas Prices
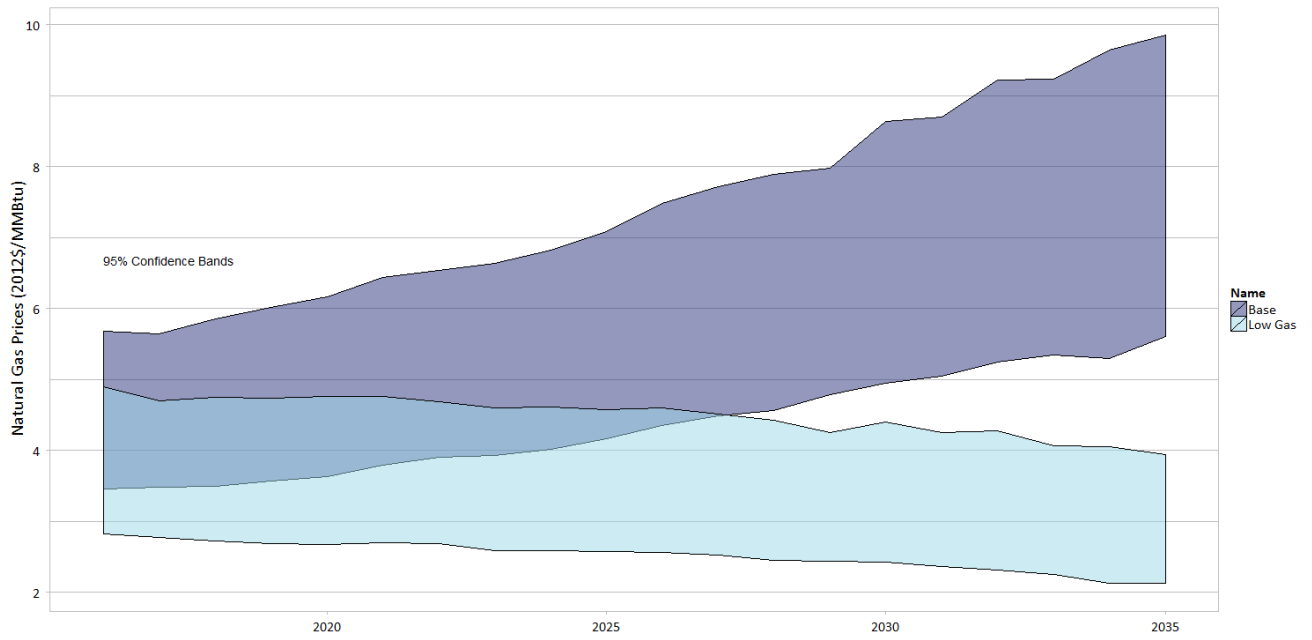
Figure O - 4: Range of Electricity Prices
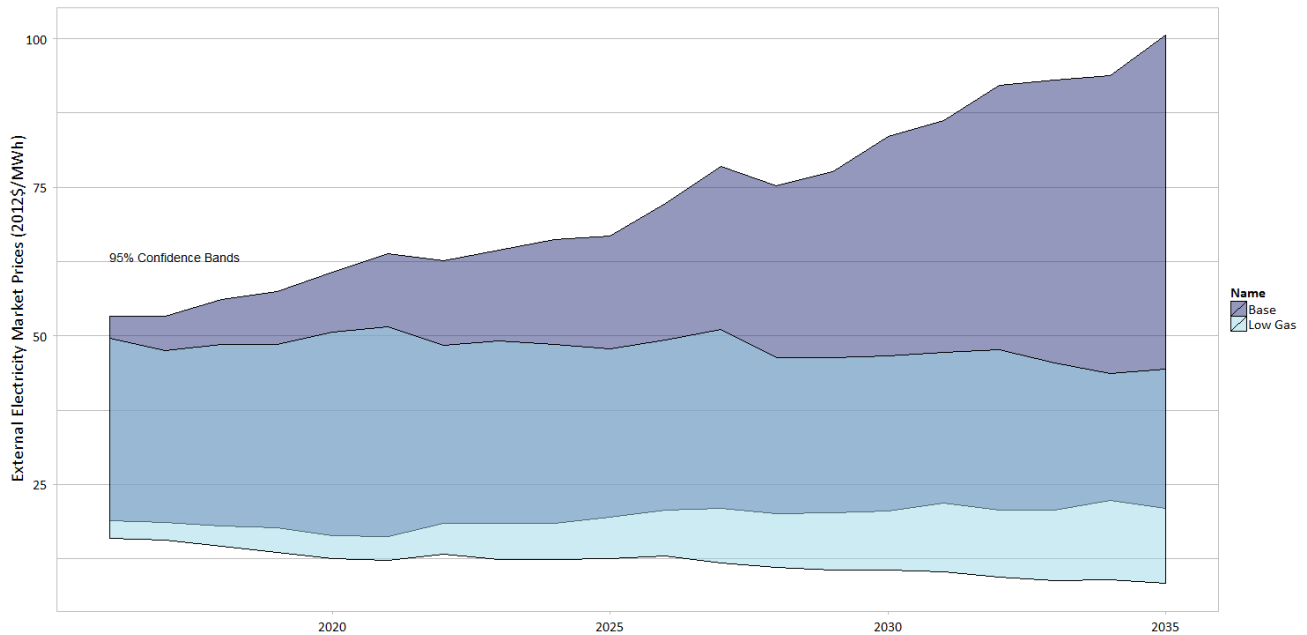
No Coal Retirement

In this scenario, the announced retirements of the Boardman, Centralia and North Valmy resources was taken out of the model. This was used to determine the impacts of these retirements on the resource strategy.

Lower Conservation - No Carbon Cost

In this scenario, the resource strategy was limited so that conservation could only be purchased if its cost was anticipated to be at or below short-run market prices. These same restrictions were not applied to other resources. This scenario is useful in examining the cost of this conservation purchasing scheme compared to developing conservation at a level that minimizes future power system costs where it is purchased on an equivalent basis to other resources.

Scenarios with Carbon Costs

Social Cost of Carbon - Mid-Range and High-Range

These scenarios assumed that alternate values of the federal government's estimates[1] for damage caused to society by climate change resulting from carbon dioxide emissions, referred to as the Social Cost of Carbon, are imposed beginning in 2016. The mid-range scenario used the average cost estimated with a 3 percent discount rate. The high-range scenario used an estimate of possible

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[1] Estimated cost of the damage of carbon emissions by the Interagency Working Group on Social Cost of Carbon

damage cost that should not occur more than 5 percent of the time. Values for these scenarios are given in Table O - 3.

By internalizing carbon costs, this analysis identifies strategies that minimize all costs, including carbon.

The model essentially reduces carbon emissions when they can be avoided at the social cost of carbon or less. The policy basis for these scenarios is that the cost of resource strategies developed under conditions which fully internalized the damage cost from carbon emissions would be the maximum society should invest to avoid such damage.

Table O - 3: Social Cost of Carbon Assumptions (2012$/Metric Ton of CO2)

Fiscal Year	Mid-Range	High-Range
FY16	$40.99	$121.00
FY17	$42.07	$125.00
FY18	$43.15	$129.00
FY19	$45.31	$134.00
FY20	$46.39	$138.00
FY21	$46.39	$141.00
FY22	$47.47	$145.00
FY23	$48.54	$148.00
FY24	$49.62	$151.00
FY25	$50.70	$154.00
FY26	$51.78	$158.00
FY27	$52.86	$161.00
FY28	$53.94	$164.00
FY29	$55.02	$167.00
FY30	$56.10	$172.00
FY31	$56.10	$175.00
FY32	$57.17	$178.00
FY33	$58.25	$181.00
FY34	$59.33	$186.00
FY35	$60.41	$189.00

Carbon Cost Risk

In this scenario, the price associated with CO2 per metric ton was modeled as a regulatory risk. The range of the potential carbon price was fixed between $0 and $110 in real 2012 dollars. The price can be applied starting from 2015 through 2035. Uncertainty about the starting date of the potential CO2 price makes this pricing scheme more consistent with an explicit price for CO2. This scenario was consistent with the CO2 risk scenario analyzed in the Sixth Power Plan and allows for some comparison between plans. More detail on the CO2 risk model is included in Appendix L.

Resource Uncertainty – Planned and Unplanned Loss of a Major Resource

Two scenarios were run to examine the impacts of resource uncertainty. In the first scenario non-CO2 emitting resources were retired in 2016, 2019, 2022 and 2025 for a combined total of about 1,000 megawatts nameplate. The other scenario involved a single similarly sized non-CO2 emitting resource, which was randomly shut down or retired sometime between 2016 and 2035. This was done using a uniform probability of retirement during each quarter.

Faster and Slower Conservation Deployment

These scenarios involved changing the input assumptions for maximum achievable conservation per year. Chapter 12 discusses the development of the input assumptions for faster and slower ramping of conservation programs. For a more detailed description of how the maximum available conservation per year, the percent of that conservation that can be achieved by program year and the maximum conservation that can be achieved over the 20-year study period see Appendix L.

No Demand Response – Carbon Cost

This scenario is the same as the **No Demand Response - No Carbon Cost** scenario except that it includes the carbon prices from the **Social Cost of Carbon - Mid-Range** scenario.

Low Fuel and Market Prices – Carbon Cost

This scenario is the same as the **Low Fuel and Market Prices - No Carbon Cost** scenario except that it includes the carbon prices from the **Social Cost of Carbon - Mid-Range** scenario.

Increased Reliance on External Markets

One of the RPM's input assumptions is the maximum level of reliance on out-of-region markets permitted to meet regional adequacy standards. In this scenario, this assumption was relaxed, i.e., reliance on out-of-region markets was increased. To implement this, the GENESYS model was run to determine the Adequacy Reserve Margins (ARM) under the assumption that maximum market reliance is 3,400 MW during high load hours in the winter instead of 2500 MW during high load hours in the winter currently used in the Resource Adequacy Assessment.[2] Since the ARM is a "reserve margin" over in-region utility controlled resources, the assumption of greater external market reliance lowers the ARM requirements. The ARM values were recalculated with a higher expectation of import availability. The result of this is that fewer in-region resources are required to be built for capacity. While the ARM for energy is roughly the same in this scenario at around -3.0 percent, the ARM for capacity is reduced from around 3.0 percent to almost -1.0 percent.

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[2] The basis of and methodology used to develop the Adequacy Reserve Margins are described in Chapter 11.

EXAMINING RESULTS

The resource strategy of the Seventh Power Plan is designed to provide the region a low-cost electricity supply to meet future load growth. It is also designed to provide a low economic risk electricity future by ensuring that the region develops and controls sufficient resources to maintain resource adequacy, limiting exposure to potential market price extremes. Therefore the amount and type of resources included in the strategy are designed to meet loads, minimize costs, and help reduce the economic risks posed by uncertain future events.

Figure O - 5 shows the average resource development by resource type for the least cost resource strategy under the major scenarios and sensitivity studies carried out to support the development of the Seventh Power Plan. The resource development shown in Figure O - 5 is the *average* over all 800 futures modeled in the Regional Portfolio Model (RPM). In the RPM the specific timing and level of resource development is unique to each of the 800 potential futures modeled. The Seventh Power Plan's principal of adaptive management is based on the reality that, as in the RPM, the timing and level of resource development in the region will be determined by actual conditions as they unfold over the next 20 years. However, what should not change are the Seventh Power Plan's priorities for resource development. In that regard, Figure O - 5 shows the significant and consistent role of energy efficiency across all scenarios. This is because of its low cost, its contribution to regional winter capacity needs and its role in mitigating economic risk from fuel price uncertainty and volatility.

After energy efficiency, the *average* development of new natural gas generation and renewable resources by 2035 is roughly equivalent. New natural gas-fired resources are developed to meet regional capacity needs while renewable resource development is driven by state renewable resource portfolio standards. Not shown in Figure O - 5 is the deployment of demand response resources because these resources primarily provide capacity (megawatts) not energy (average megawatts) and the increased dispatch of existing gas generation to replace retiring coal generation. Both of these resources also play significant roles in the Seventh Power Plan's resource strategy. Each element of the resource strategy is discussed below.

Figure O - 5: Average Resource Development in Least Cost Resource Strategy by 2035 in Alternative Scenarios
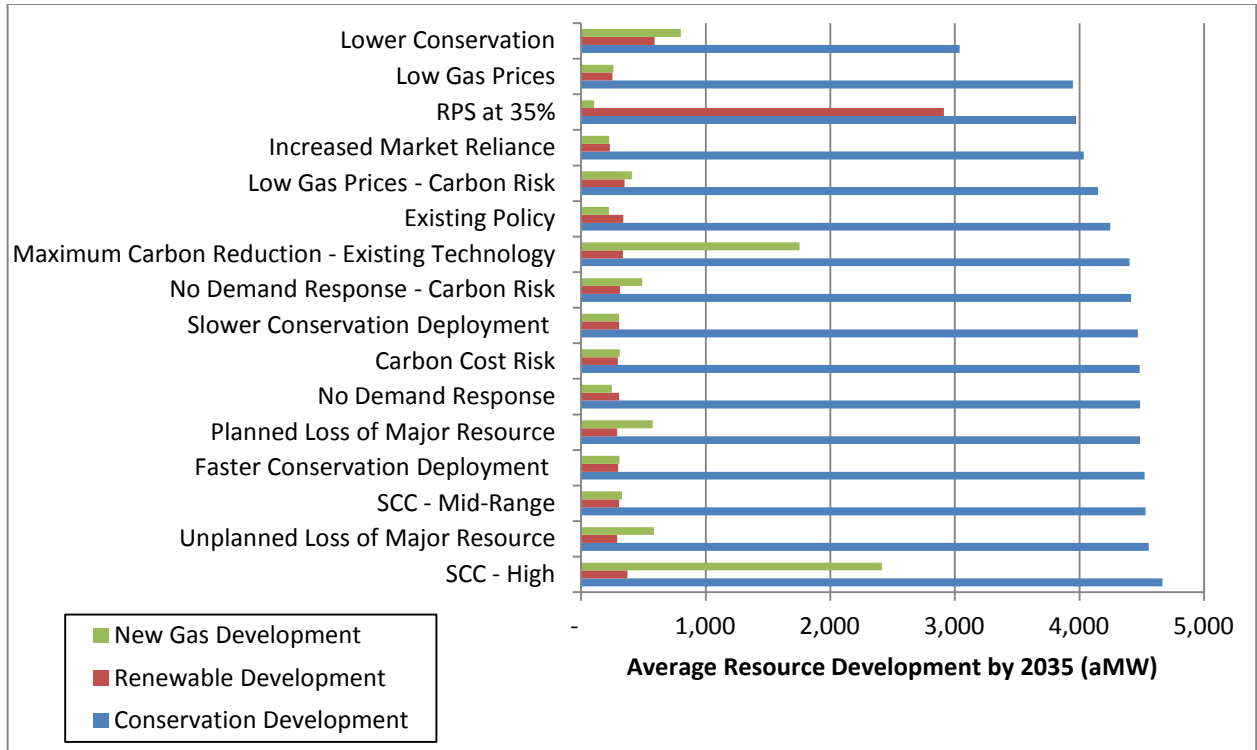
Energy Efficiency Resources

Energy efficiency has been important in all previous Council power plans. The region has a long history of experience improving the efficiency of electricity use. Since the Northwest Power Act was enacted, the region has developed nearly 5,800 average megawatts of conservation. This achievement makes efficiency the second-largest source of electricity in the region following hydroelectricity.

As in all prior plans, the highest priority new resource in the Seventh Power Plan resource strategy is improved efficiency of electricity use, or conservation. Figure O - 6 shows that the region's net load after development of all-cost effective energy efficiency remains essentially the same over the next 20 years. This finding holds under scenarios that both consider carbon dioxide risk or damage cost and those that do not and even when natural gas and electricity prices are lower than generally anticipated. The only scenario that developed significantly less energy efficiency was the scenario specifically designed to do so. The **Lower Conservation** scenario developed roughly 1200 average megawatts less energy efficiency by 2035 than the **Existing Policy** scenario. The **Lower Conservation** scenario had significantly higher ($14 billion) average system cost and exposed the region to much larger ($19 billion) economic risk than the **Existing Policy** scenario. However, as Figure 3 - 2 shows, even under that scenario, the development of energy efficiency offsets regional load growth through 2030.

The attractiveness of improved efficiency is due to its relatively low cost coupled with the fact that it provides both energy and capacity savings and is not subject to major sources of economic risk. The

average cost of conservation developed in the least cost resource strategies across all scenarios tested was half the cost of alternative generating resources. The average levelized cost of the cost-effective efficiency developed in the Seventh Power Plan's resource strategy is $30 per megawatt-hour.[3] The comparable estimated cost of a natural gas-fired combined-cycle combustion turbine is around $75 per megawatt-hour. The current cost of utility scale solar photovoltaic systems is approximately $65 per megawatt-hour and Columbia Basin wind costs $110 per megawatt-hour, including the cost of integrating these variable output resources into the power system. Significant amounts of improved efficiency also cost less than the forecast market price of electricity. Nearly 2,300 average megawatts of energy efficiency are available at cost below $30 per megawatt-hour.

Conservation also lacks the economic risk associated with volatile fuel prices and carbon dioxide emission reduction policies. Its short lead time and availability in small increments also reduce its economic risk. Therefore, improved efficiency reduces both the cost and economic risk of the Seventh Power Plan's resource strategy.

Figure O - 6: Average Net Regional Load After Accounting for Cost-Effective Conservation Resource Development

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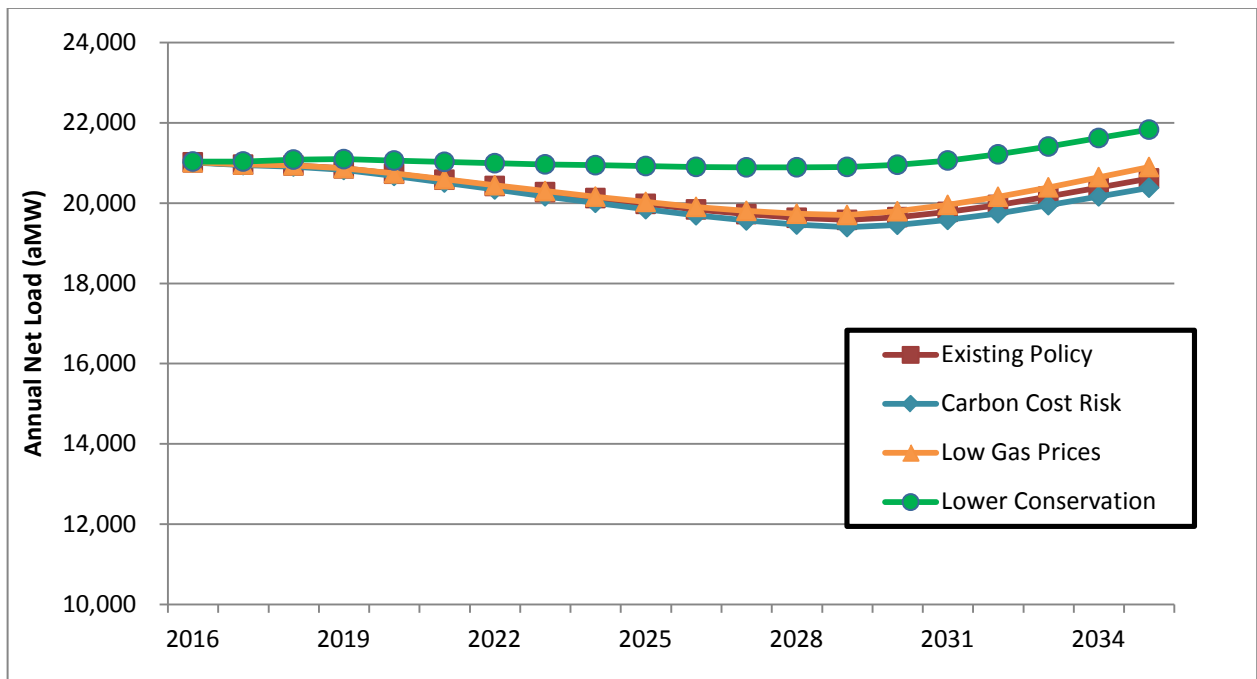
[3] This is the average real levelized cost of all conservation measures acquired in the resource strategy, excluding a cost-offset that is expected to occur as a result of lower load growth which defers the need to expand distribution and transmission systems. In evaluating conservation's cost-effectiveness in the RPM, this cost-offset was included, as well as other non-energy benefits, such as water savings from more efficient clothes washers. If the cost-offset benefits provided by energy efficiency's deferral of investments in distribution and transmission expansion are considered, the average levelized cost is $18 per megawatt-hour.

In the Council's analysis, additional resources are added to provide insurance against future uncertainties. Efficiency improvement provides attractive insurance for this purpose because of its low cost. In futures or time periods when the extra resources are not immediately needed, the energy and capacity can be sold in the market and all or at least a portion of their cost recovered. This is not true for generating resources, for in periods when market prices are at or below their variable operating cost; these resources cannot recover any of their capital cost. In addition, because of its low average cost to utilities, the development of energy efficiency offers the potential opportunity to extend the benefits of the Northwest's hydro-system through increased sales.

In all of the scenarios and sensitivity studies examined by the Council, similar amounts of improved efficiency were found to be cost-effective.[4] The selection of energy efficiency as the primary new resource does not depend significantly on whether or not carbon dioxide policies are enacted. Figure O - 7 shows the average amount of efficiency acquired in various scenarios considered by the Council in the power plan by 2021, 2026, and 2035. In all scenarios, the amount of cost-effective efficiency developed averages between 1,300 and 1,450 average megawatts by 2021 and 3,900 and 4,600 by 2035. The amount of conservation developed varies in each future considered in the Regional Portfolio Model. For example, in the Carbon Cost Risk scenario, the average conservation development is 4,485 average megawatts, but individual futures can vary from as low as 4,000 average megawatts to as high as just over 5,000 average megawatts.

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[4] The only exception is the Lower Conservation scenario which as explicitly designed to develop less energy efficiency.

Figure O - 7: Amount of Cost-Effective Conservation Resources Developed Under Different Scenarios
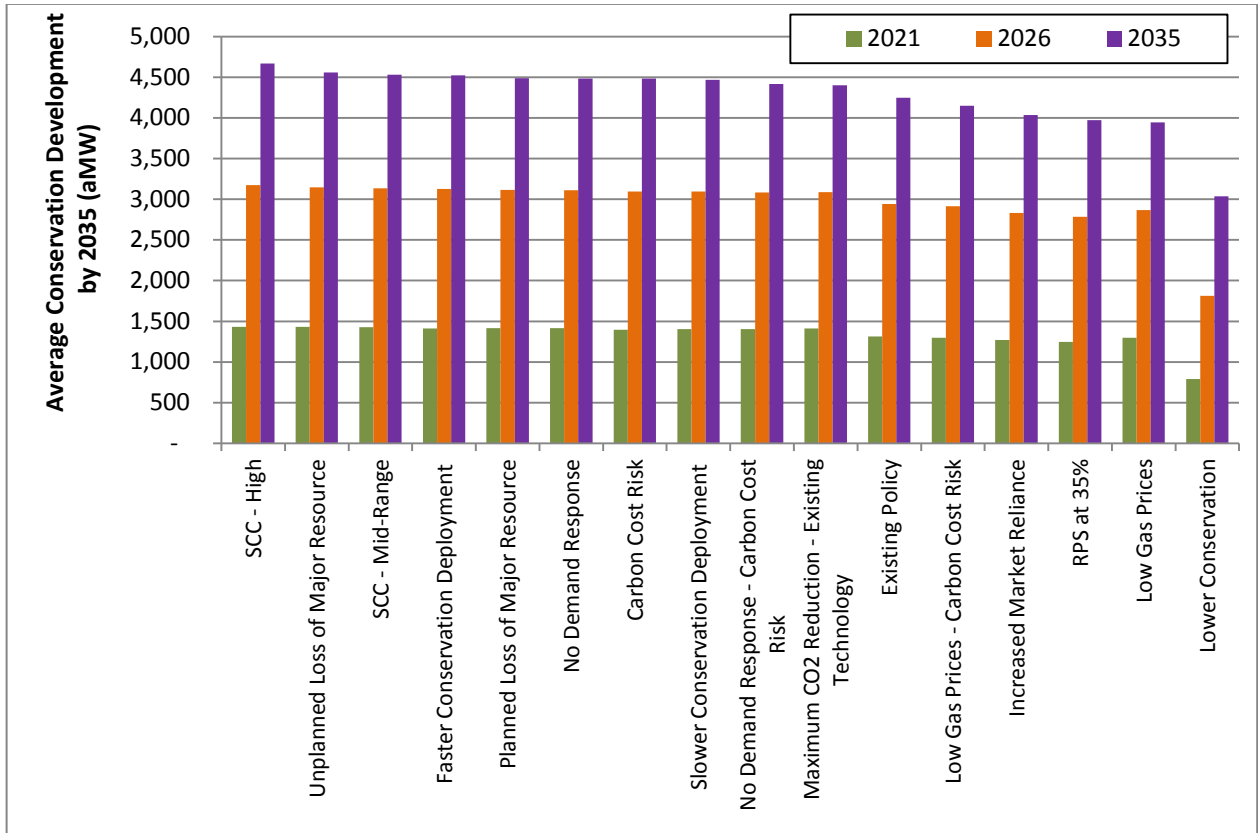
The nature of efficiency improvement is that the total cost is recovered over a smaller number of sales. Average cost per kilowatt-hour sold will increase, but because total consumption is reduced, average consumer electricity bills will be smaller. Consumers who choose not to improve their efficiency of use could see their bills increase. However, if the region does not capture the efficiency, the higher cost of other new generating resources will increase everyone's bills. The impact on both bills and average revenue requirement per kilowatt-hour is discussed later in this chapter.

The Council has identified significant new efficiency opportunities in all consuming sectors. Figure O - 8 shows by levelized cost the sectors of efficiency improvements. Additional information on the sources and costs of efficiency improvements is provided in Chapter 12 and Appendix G.

Improved efficiency contributes not only to meeting future energy requirements, but also provides capacity during peak load periods. The savings from conservation generally follow the hourly shape of energy use, saving more energy when more is being used. As a result, efficiency contributes more to load reduction during times of peak usage. To model the impact of energy efficiency on the hourly demand for electricity, the Council aggregated the load shapes of efficiency savings from the hourly shape of individual end-uses of electricity and the cost-effective efficiency improvements in those uses. Figure O - 9 shows the shape of the savings for all measures during heavy and light load hours. As is shown, the energy savings are greater during the winter season than summer, in large part due to significant savings from conversion of electric resistance heating to more efficient heat pump technologies and increased use of lighting during the winter period.

Figure O - 8: Efficiency Potential by Sector and Levelized Cost by 2035
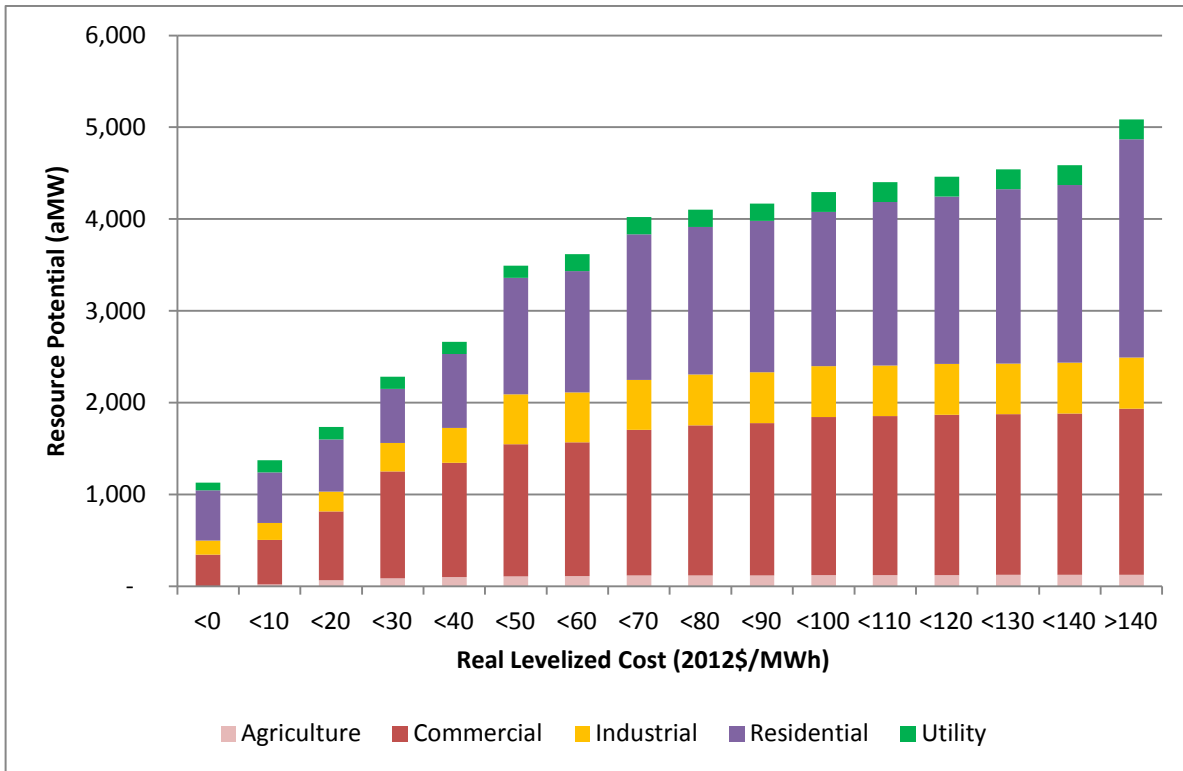
For example, efficiency improvements that yield average annual savings of 4,485 average megawatts create 10,700 megawatts of peak hour savings during the winter months.[5] The capacity impact of energy efficiency is almost two times the energy contribution in winter. This reduction in both system energy and capacity needs makes energy efficiency a valuable resource relative to generation because efficiency provides winter energy and capacity resources shaped to load. Because each efficiency measure has a specific shape, or capacity impact, the Seventh Power Plan explicitly incorporates the value of deferred generation capacity in the cost-effectiveness methodology for measures and programs.[6]

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[5] See Chapter 12 for a description of how the capacity savings of energy efficiency measures are estimated and Chapter 11 for a description of how the system level capacity savings, or Associated System Capacity Contributions, of conservation and generation resources are estimated.
[6] See action items RES-2 and RES-3 in Chapter 4 and Appendix G

Figure O - 9: Monthly Shape of 2035 Efficiency Savings
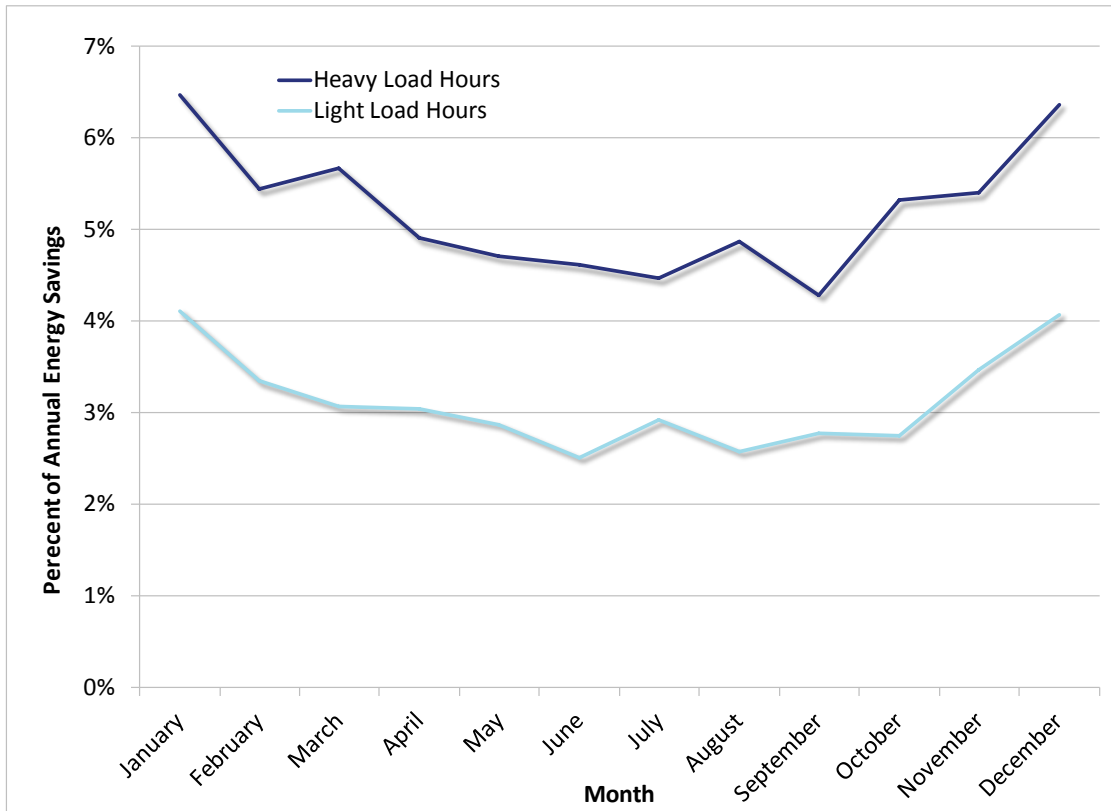
Demand Response

Demand response resources (DR) are voluntary reductions (curtailments) in customer electricity use during periods of high demand and limited resource availability. As deployed in the Seventh Power Plan, demand response resources are used to meet winter and summer single-hour peak demands primarily under critical water and extreme weather conditions. Other potential applications of demand response resources, such as the integration of variable resources like wind, were not considered in the Seventh Power Plan.

In many areas of the US, demand response resources have long been used by utilities to offset the need to build additional peaking capacity. In the Northwest, the existing hydropower system has been able to supply adequate peaking capacity, so the region has far less experience with deployment of demand response resources. To assess the economic value of developing demand response in the Northwest, the Council conducted two sensitivity studies that assumed demand response resources were not available. The average net present value *system cost* and *economic risk* of the least cost resource strategy without demand response were $1 billion higher than in the least cost resource strategy that was able to deploy this resource. Therefore, from the Seventh Power Plan's analysis it appears that if barriers to development can be overcome and the Council's

analysis of the cost of demand response are accurate; demand response resources could provide significant regional economic benefits.[7]

The Council's assessment identified more than 4300 megawatts of regional demand response potential. A significant amount of this potential, more than 1500 megawatts, is available at relatively low cost, under $25 per kilowatt of peak capacity per year. When compared to the alternative of constructing a simple cycle gas-fired turbine, demand response resources can be deployed sooner and in quantities better matched to the peak capacity need. Figure O - 10 shows the cumulative potential for each of the four blocks (i.e., price bins) of demand response modeled in the Regional Portfolio Model. Cumulative achievable potential by the years 2021, 2026, and 2035 is shown for both winter and summer capacity demand response programs. Note that the largest single block of estimated demand response potential is also the least costly.

Figure O - 10: Demand Response Resource Supply Curve
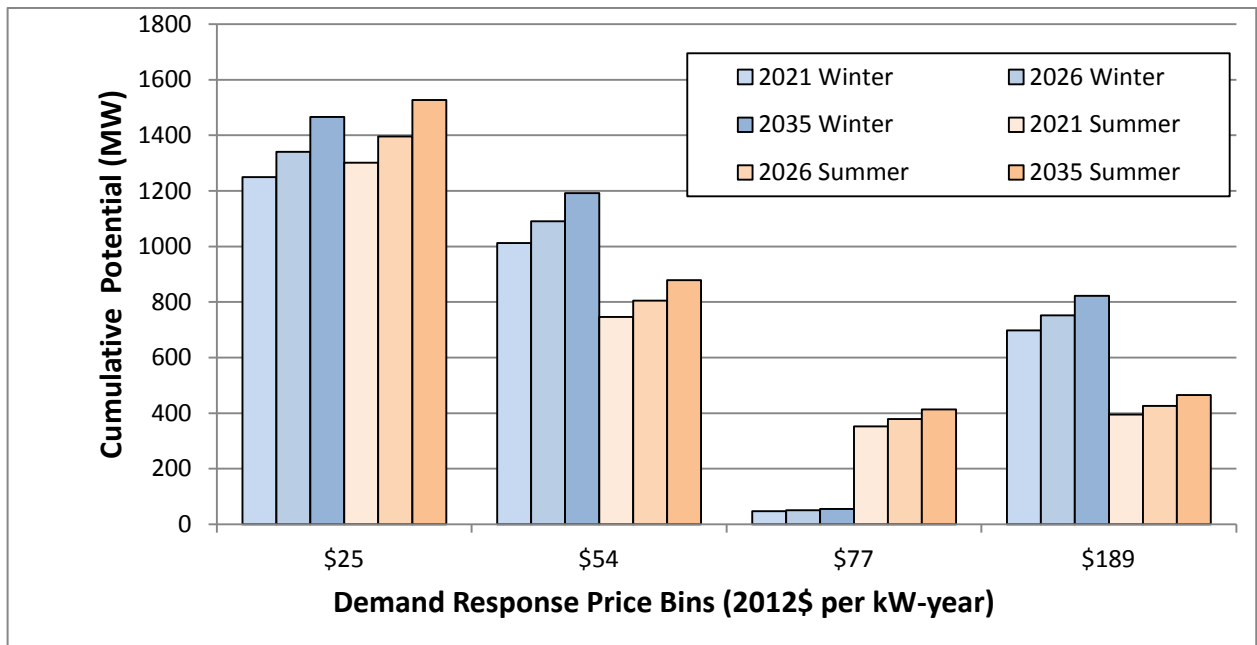
The low cost of demand response resources make them the most economically attractive option for maintaining regional peak reserves to satisfy the Council's Resource Adequacy Standards. The low cost of demand response resources make them particularly valuable because the need for peaking capacity resources to meet resource adequacy in the region is a function of a combination of water and weather conditions that have low probability of occurrence. This is illustrated by Figure O - 11 which shows the amount of demand response resource needed by 2021 across the 800 futures tested in the RPM across multiple scenarios.

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[7] See Chapter 4 for the Action Items the Seventh Power Plan recommends the region and Bonneville should engage to specifically address the barriers to development of demand response resources.

Figure O - 11 shows that there is a wide range of both the amount and probability of development from zero up to 2300 MW, depending on what scenario is being analyzed. In the **Increased Market Reliance** scenario**,** more than 70 percent of the futures require no demand response development. Under most other scenarios there is around a 20 percent probability that as much as 600 MW of demand response will need to be developed by 2021 and a 15 percent probability that as much as 1100 MW would need to be developed.

It is striking to note the contrast in demand response development in the **Increased Market Reliance** scenario**,** which assumed the region could place greater reliance on external power markets to meet its winter peak capacity needs, and other scenarios that used the limits on external market reliance used in the Regional Resource Adequacy Assessment. The amount of demand response developed *on average* across all futures decreased from 700 MW to less than 100 MW. In this scenario, net present value system cost and economic risk were also lower. This highlights the sensitivity of the assumed limits on external market reliance used in the Council Regional Resource Adequacy Assessment and the potential value to the region if it can rely upon additional imports.

Figure O - 11: Demand Response Resource Development by 2021 Under Alternative Scenarios
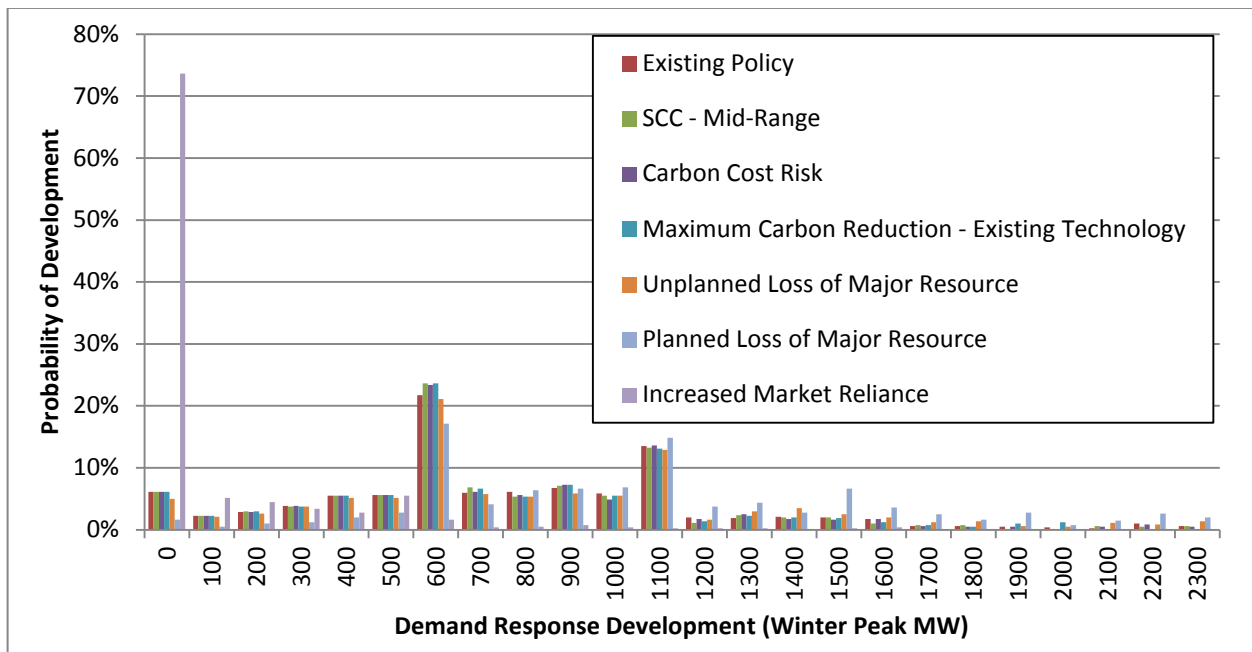
Renewable Generation

Since the adoption of the Sixth Plan renewable generating resources development has increased significantly. This development was prompted by Renewable Portfolio Standards (RPS) adopted in three of the four Northwest states and in California. Wind energy has been the principal focus of renewable resource development in the Pacific Northwest. From 2010 through 2014 about 4,100 megawatts of wind nameplate capacity was added to the region – about equivalent to the development during the previous five year period. By the end of 2014, wind nameplate capacity in the region totaled just over 8,700 megawatts. However, only about 5,550 megawatts of that

nameplate capacity currently serves Northwest loads. The remaining 3,150 megawatts of wind nameplate capacity is presently contracted to utilities outside the region, primarily California.

It appears, however, that the rapid development of wind is likely to slow down over the next five year period due to the expiration of incentives and low load growth.

Existing wind resources are estimated to provide about 2,400 average megawatts of energy generation per year in the region, or about 8 percent of the region's electricity energy supply. However, on a firm capacity basis, wind resources only provide about 1 percent of the region's total system peaking capability. The Council's current analysis of wind's ability to supply peaking capacity is based on the Resource Adequacy Assessment Advisory Committee's estimate that wind can only be relied upon to provide about 5 percent of its nameplate capacity toward meeting peak loads due to the variable nature of the resource.

Aside from hydropower, the renewable resources included in the Regional Portfolio Model (RPM) are wind and solar photovoltaic (solar PV). The Council recognizes that additional small-scale renewable resources are likely available and cost-effective. These small-scale renewables were not modeled in the RPM but the plan encourages their development as an important element of the resource strategy. In addition, there are many potential renewable resources not captured in the resource strategy that are currently either too expensive or unproven technologies that may, with additional research and demonstration, prove to be valuable future resources.

New wind resources that have ready access to transmission produce energy at costs that are competitive on an energy basis with other generation alternatives. Recent and forecast reductions in solar PV system cost are making utility scale system's energy production cost increasingly cost-competitive. However, renewable generation development in the scenarios tested for the Seventh Power Plan is driven by state RPS and not economics. Figure O - 12 shows the average development of renewable resources across scenarios analyzed for the Seventh Power Plan. As can be seen from this figure, under all least cost resource strategies for all scenarios, except when the RPS were assume to increase to 35 percent, only 300 to 400 average megawatts of renewable resource development occurs later in the planning period (post-2026) after the Oregon and Washington renewable credit bank balances are forecast to be drawn down.

Figure O - 12: Average Renewable Resource Development by Scenarios by 2021, 2026 and 2035
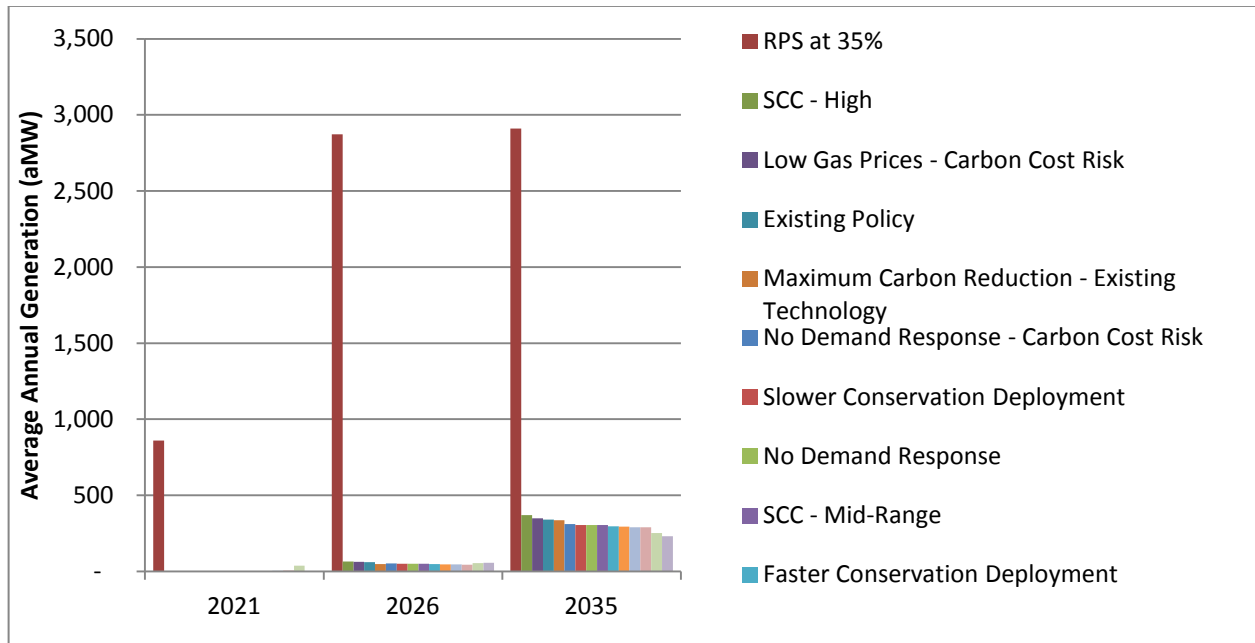
The amount of renewable energy acquired depends on the future demand for electricity because state requirements specify percentages of demand that have to be met with qualifying renewable sources of energy. Across the 800 futures of demand growth in the **Carbon Cost Risk** scenario, the amount of wind and solar PV developed on average is about 300 average megawatts, with slightly more solar PV developed than wind. The only exception to this level of development is the **RPS at 35 percent** scenario that assumed regional renewable resource portfolio standards would be increased to 35 percent of annual regional load. In this scenario the least cost resource strategy develops 2,900 average megawatts of additional renewable resources, primarily wind generation by 2035.

The explanation of the outcome described above is that while the two economically competitive renewable resources available in the region, wind and solar PV, produce significant amounts of energy, they provide little or no winter peaking capacity. Partly as a result of the significant wind development in the region over the past decade, the Northwest has a significant energy surplus, yet under critical water and extreme weather conditions the region faces the probability of a winter peak capacity shortfall. In short, the generation characteristics of the currently economically competitive renewable resources do not align well with regional power system needs.

As stated above, the development of renewable generation is driven by state renewable portfolio standards more so than regional energy need. In the absence of higher renewable portfolio standards little additional renewable development would take place, even under scenarios where the highest social cost of carbon dioxide (**SCC-High**) might be imposed on the power system.

Natural Gas-Fired Generation

Natural gas is the fourth major element in the Seventh Power Plan resource strategy. It is clear that after efficiency and demand response, new natural gas-fired generation is the most cost-effective resource option for the region in the near-term. Moreover, also after energy efficiency, the Seventh Power Plan identified the increased use of existing natural gas generation as offering the lowest cost option for reducing regional carbon dioxide emissions. Other resource alternatives may become available over time, and the Seventh Power Plan recommends actions to encourage expansion of the diversity of resources available, especially those that do not produce greenhouse gas emissions.

Across the scenarios evaluated, there is significant variance in the amount of new gas-fired generating resources that are optioned and in the likelihood of completing the plants. New gas-fired plants are optioned (sited and licensed) in the RPM so that they are available to develop if needed in each future. The Seventh Power Plan's resource strategy includes optioning new gas fired generation as local needs dictate. However, from an aggregate regional perspective, which is the plan's focus, the need for additional new natural gas-fired generation is very limited in the near term (through 2021) and low in the mid-term (through 2026) under nearly all scenarios. That is, options for new gas-fired generation are taken to construction in only a relatively small number of futures. Figures 15 - 17 and 15 - 18 show the probability that a thermal resource option would move to construction by 2021 and by 2026. The scenarios are rank-ordered based on the probability of any new gas resource development by 2021 and by 2026. Scenarios with the lowest probability of development are at the top of the graphs.

As can be observed from a review of Figure O - 13, the probability of gas development is less than 10 percent by 2021 in all but four scenarios. The only exceptions to this finding are in the **RPS at 35 percent** scenario and in scenarios where the region is unable to deploy demand response or acquires less conservation than projected. In these scenarios, the probability of moving from an option to construction on new gas-fired generation increases to 40 percent or higher.

By 2026, Figure O - 14 shows that the probability of moving from an option to actual construction of a new gas-fired thermal plant increases to more than 80 percent in the **SCC-High** and **Maximum Carbon Reduction – Existing Technology** scenarios. This occurs because under both of these scenarios existing coal and inefficient gas-fired generation are retired or displaced by new, highly efficient natural gas generation to reduce regional carbon dioxide emissions.

Figure O - 13: Probability of New Natural Gas-Fired Resource Development by 2021
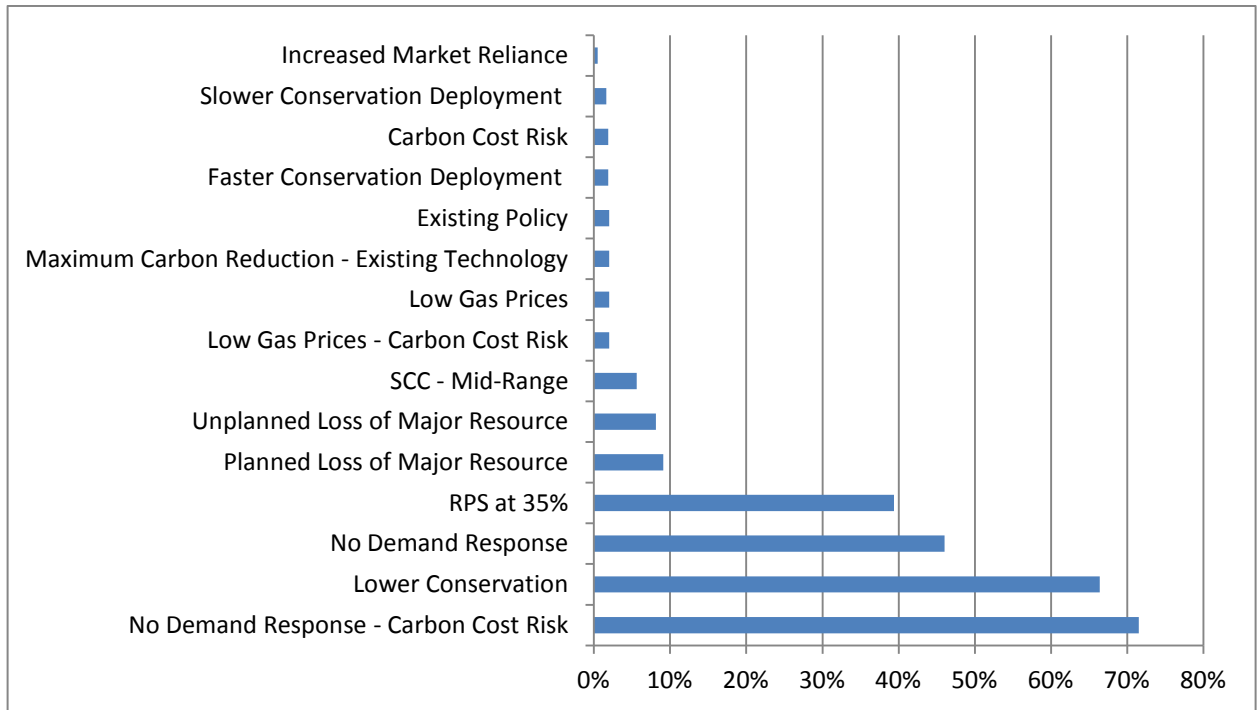
The development of natural gas combined cycle combustion turbines is largest when there is a need for both new capacity and energy to meet regional adequacy standards. As can be observed from the data shown in Figures O - 13 and O - 14, this occurs in scenarios that must replace energy generation lost due to the retirement of resources, such as in the two scenarios that retire or decrease the use of existing coal and inefficient existing gas plants or those that assume no demand response resources or develop significantly less amounts of energy efficiency.

Figure O - 14: Probability of New Natural Gas-Fired Resource Development by 2026
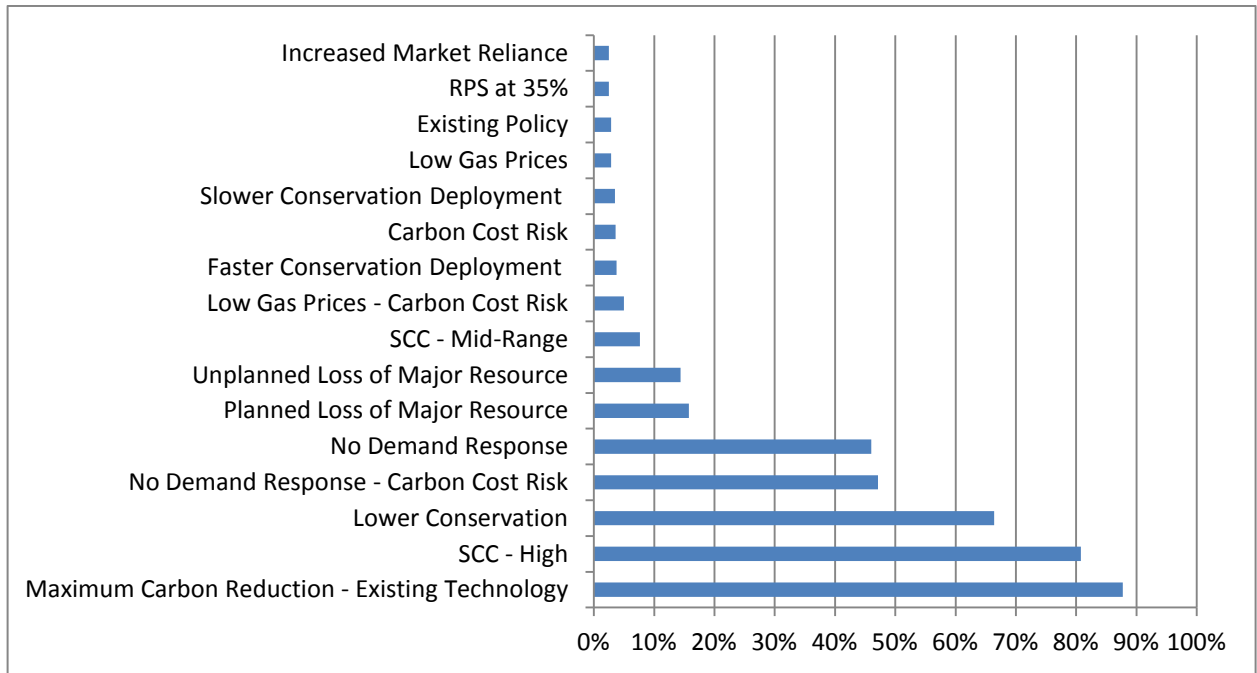
As can be seen from the prior discussion, while the amounts of efficiency, demand response, and renewable resources developed were fairly consistent across most scenarios examined, the future role of new natural gas-fired generation is more variable and specific to the scenarios studied. Figure O - 15 shows the average amounts of gas-fired generation across 800 futures considered in each of the principal scenarios. The amount of new natural gas-fired generation constructed varies in each future. In most scenarios the average annual dispatch of new natural gas-fired generation is less than 50 average megawatts by 2026 and only between 300 to 400 average megawatts by 2035. In the **Carbon Cost Risk** scenario, the amount of energy generated from new combined cycle combustion turbines, when averaged across all 800 futures examined, is just 10 average megawatts in 2035. In contrast, the average amount generated across 800 futures is closer to 100 average megawatts in 2035 in the two scenarios that assume no demand response resources are developed.

However, the role of natural gas is larger than it appears in the Council's analysis of the regional need for new natural gas fired generation for a number of reasons. First, the regional transmission system has not evolved as rapidly as the electricity market, resulting in limited access to market power for some utilities. Second, some utilities have significant near-term resource challenges, particularly if there is limited access to surplus resources from others. These factors limit the ability of the regional resource strategy to be specific about optioning and construction dates for natural gas-fired resources, or for the types of natural gas-fired generation. As a result, new gas-fired generation may be required in such instances even if the utilities deploy demand response resources and develop the conservation as called for in Seventh Power Plan.

Figure O - 15: Average New Natural Gas-Fired Resource Development
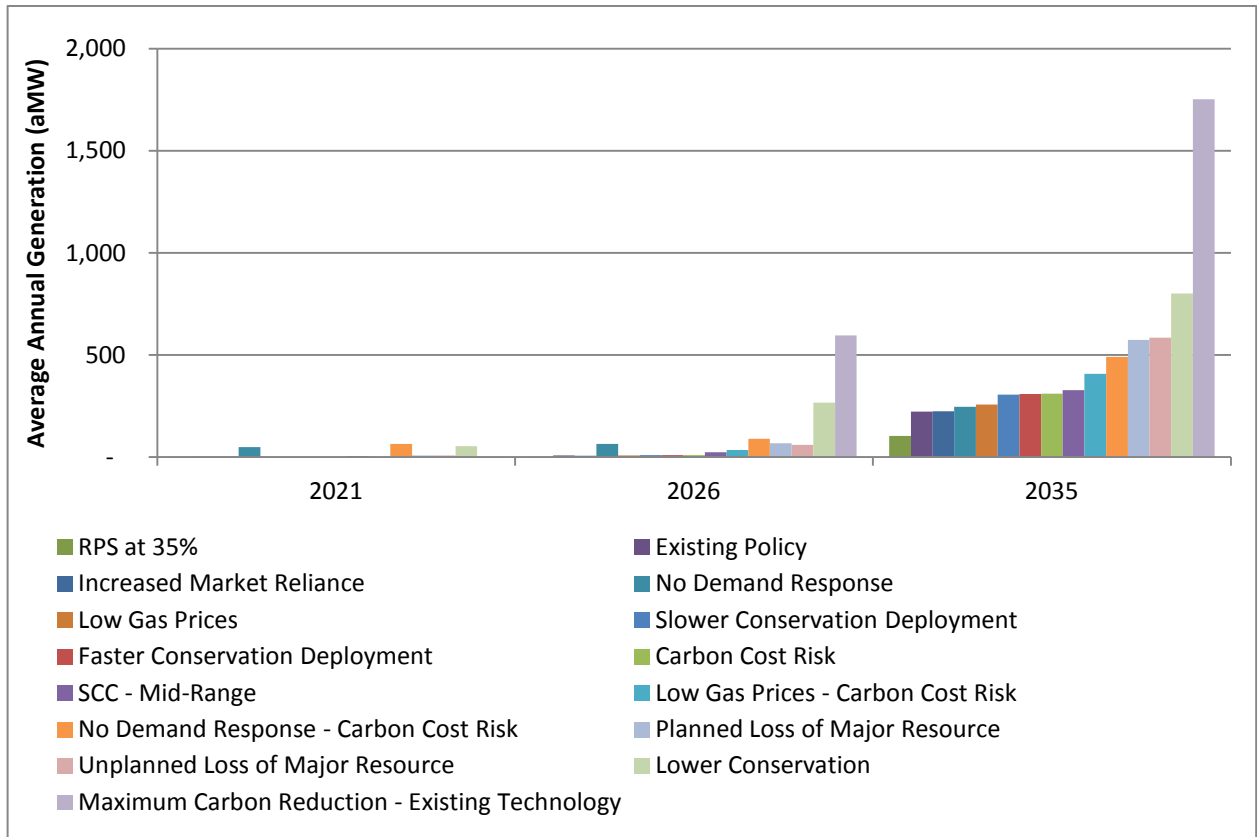
Third, the increased use of the *existing* natural gas generation in the region plays a major role in many of scenario's least cost resource strategies, particularly those that explored alternative carbon dioxide emissions reduction policies. Figure O - 16 shows the average annual dispatch of the existing natural gas generation in the region through time for the five carbon dioxide reduction policy scenarios as well as the **Existing Policy** scenario. A review of Figure O - 16 reveals that the annual dispatch of existing natural gas generating resources increases in response to carbon dioxide emission reduction policies.

For example, under the two **Social Cost of Carbon** scenarios, existing natural gas generation increases immediately following the assumed 2016 imposition of carbon dioxide damage cost in those scenarios. In the **Carbon Cost Risk** scenario, existing natural gas generation gradually increases over time as the regulatory cost of carbon dioxide increases. In the **Maximum Carbon Reduction – Existing Technology** scenario, existing gas generation increases post-2025 when, under this scenario, the entire region's existing coal-fired generation fleet is retired. Under the **RPS at 35 percent** scenario, existing natural gas generation actually declines through time as low variable cost resources are added to the system, generally lowering market prices and diminishing the economics of gas dispatch.

Figure O - 16: Average Annual Dispatch of Existing Natural Gas-Fired Resources
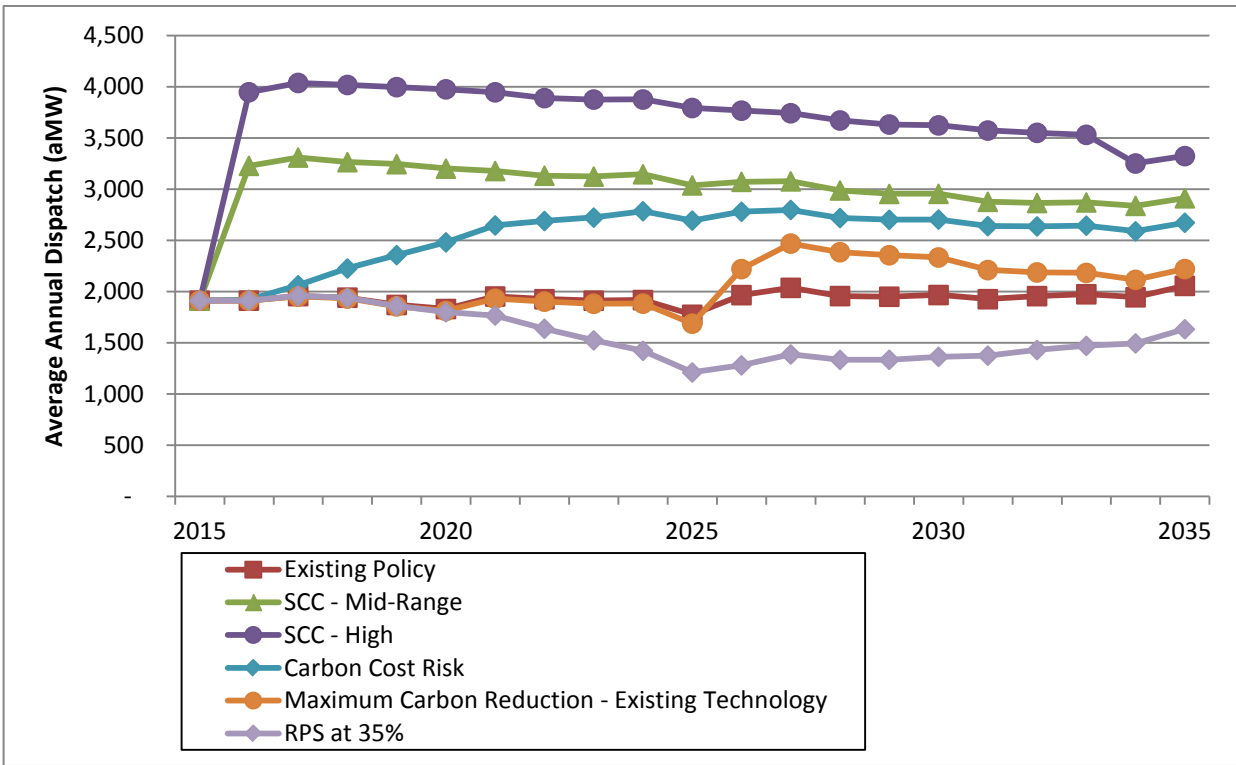
Carbon Emissions

As in the Sixth Power Plan, one of the key issues identified for the Seventh Power Plan is climate-change policy and the potential effects of proposed carbon regulations. In addition, the Council was asked to address what changes would be needed to the power system to reach a specific carbon reduction goal and what those changes would cost. This section summarizes how alternative resource strategies compare with respect to their cost and ability to meet carbon dioxide emissions limits established by the Environmental Protection Agency. In providing analysis of carbon emissions and the specific cost of attaining carbon emission limits, the Council is not taking a position on future climate-change policy. Nor is the Council taking a position on how individual Northwest states or the region should comply with EPA's carbon dioxide emission regulations. The Council's analysis is intended to provide useful information to policy-makers.

Figure O - 17 shows the two U.S. Government Interagency Working Group's estimates used for the two **Social Cost of Carbon** scenarios and the range (shaded area) and average carbon prices across all futures that were evaluated in the $0-to-$110-per-metric ton **Carbon Risk** scenario.

Figure O - 17: Carbon Regulatory Cost or Price and Societal Cost of Carbon Tested in Scenario Analysis
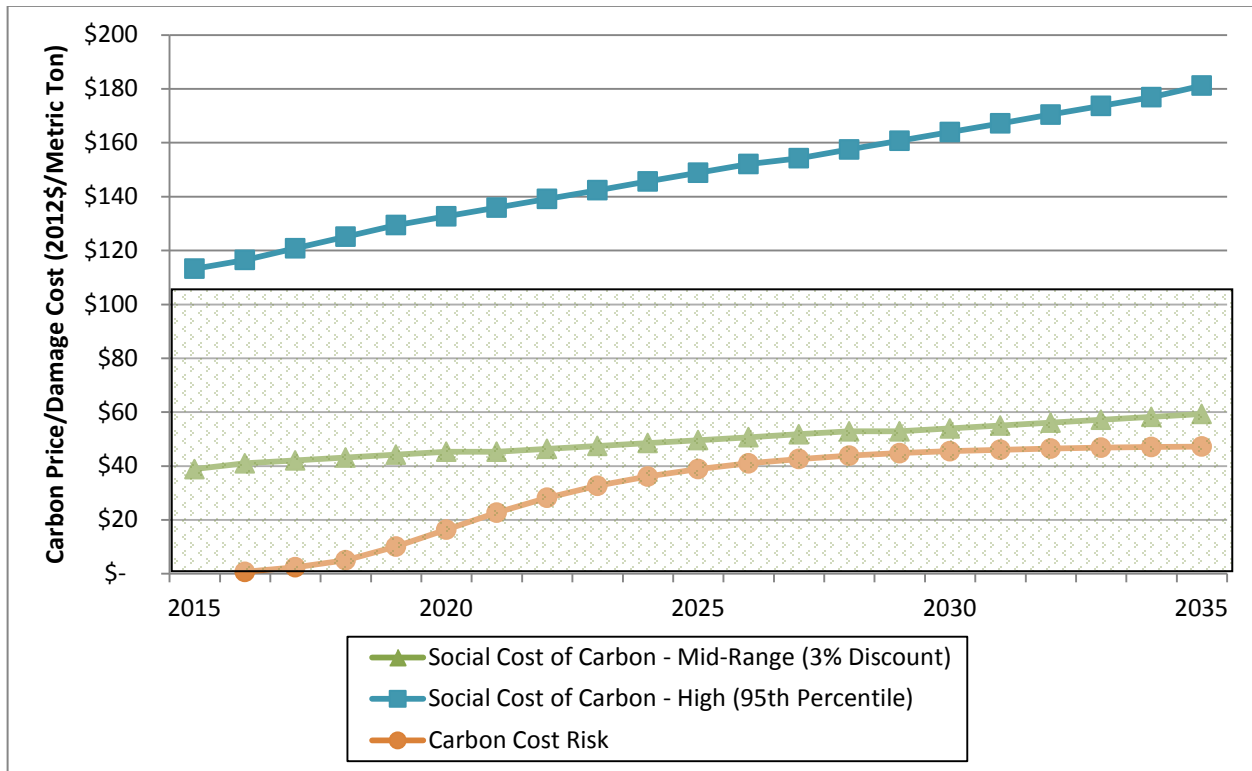
Carbon prices or estimated damage costs are not included in the **Existing Policy** scenario, nor are they included in the **Maximum Carbon Reduction** - **Existing Technology** or **Regional 35 Percent RPS** scenarios describe earlier in this chapter. Therefore, comparing the cost and emissions from these scenarios provides insights into the impact of alternative policy options for reducing carbon emissions.

In order to compare the cost of resource strategies that reflect both "carbon-pricing" and "non-carbon pricing" policy options for reducing carbon dioxide emissions, it is useful to separate a strategy's cost into two components. The first is the direct cost of the resource strategy. That is, the actual the cost of building and operating a resource strategy that reduces carbon dioxide emissions. The second component of any strategy is the revenue collected through the imposition of carbon taxes or pricing carbon damage cost into resource development decisions. This second cost component, either in whole or in part, may or may not be paid directly by electricity consumers. For example, the "social cost of carbon" represents the estimated economic damage of carbon dioxide emissions worldwide. In contrast to the direct cost of a resource strategy which will directly affect the cost of electricity, these "damage costs" are borne by all of society, not just Northwest electricity consumers.

In the discussion that follows, the direct cost of resource strategies are reported separately from the carbon dioxide revenues associated with that strategy. Carbon dioxide prices or estimated damage costs are not included in the **Existing Policy**, **Maximum Carbon Reduction** - **Existing Technology** or the **RPS at 35%** scenarios. Therefore, only the direct costs of the least cost resource strategies for these scenarios are reported.

Figure O - 18 shows the direct resource strategy average system costs and carbon emissions from the ten scenarios and sensitivity studies conducted to specifically evaluate carbon emissions reduction policies (and risks) for the development of the Seventh Power Plan. This figure shows the average net present value system cost (bars) for the least cost resource strategy for each scenario, both with and without carbon tax revenues. It also shows the average carbon emissions projected for the generation that serves the region in 2035.

Figure O - 18: Average System Costs and PNW Power System Carbon Emissions by Scenario in 2035
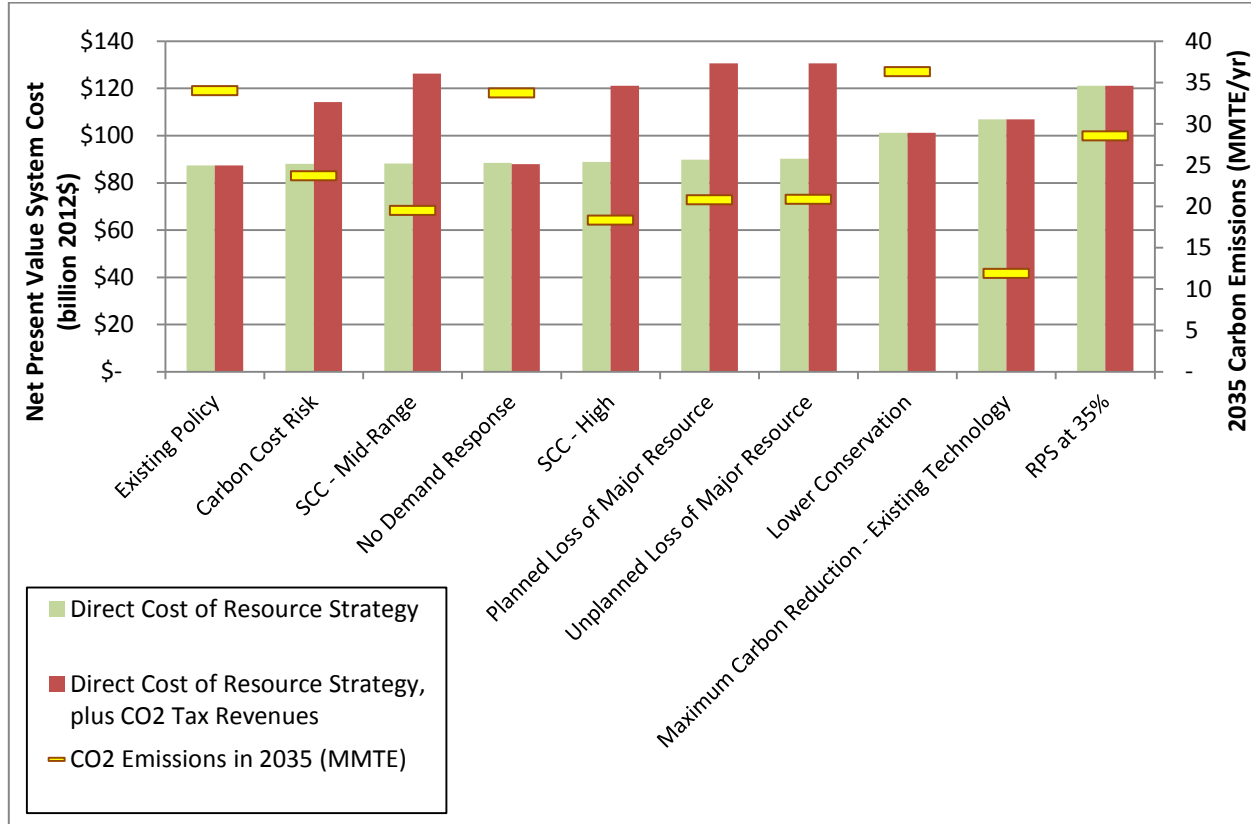
Figure O - 18 shows the **Existing Policy** scenario results in carbon emissions in 2035 of 34 million metric tons. This scenario assumed no additional policies to reduce carbon emissions beyond currently announced coal plant retirements are pursued. The average present value system cost of this resource strategy is $88 billion (2012$). The **Social Cost of Carbon – Mid-Range** (SCC-Mid-Range) and **Social Cost of Carbon – High-Range** (SCC-High**)** scenarios reduce carbon emissions to about between 18 to 20 million metric tons in 2035. The average system cost, excluding the carbon tax revenues for these scenarios is $0.8 billion for the **SCC – Mid-Range** and $1.6 billion for the **SCC – High** more than the average system cost of the **Existing Policy** scenario.

Under the **Carbon Cost Risk** scenario, 2035 carbon emissions were reduced to 24 million metric tons, or 10 million metric tons below the **Existing Policy** scenario. The average present value cost of this scenario, net of carbon tax revenues is $0.7 billion above the **Existing Policy** scenario. Under the **Maximum Carbon Reduction – Existing Technology** scenario, 2035 carbon emissions are reduced to 12 million metric tons and average system cost is are approximately $20 billion over

the **Existing Policy** scenario. The large increase in average system cost for this scenario over the **Existing Policy** case results from the replacement of all of the region's existing coal and inefficient natural gas fleet with new, more efficient natural gas-fired combustion turbines.

The **RPS at 35%** scenario reduces 2035 carbon emissions to just under 30 million metric tons. This is a reduction of around 5 million metric tons per year compared to the **Existing Policy** scenario. The direct cost of this resource strategy is approximately $121 billion or $34 billion more than the **Existing Policy** scenario.

Comparing the results of these scenarios based on a single year's emissions can be misleading. Each of these policies alters the resource selection and regional power system operation over the course of the entire study period. Figure O - 19 shows the annual emissions level for each scenario. A review of Figure O - 19 reveals that the two social cost of carbon scenarios, which assume carbon dioxide damage costs are imposed in 2016, immediately reduce carbon dioxide emissions and therefore have impacts throughout the entire twenty year period covered by the Seventh Plan. In contrast, the other three carbon dioxide reduction policies phase in over time, so there cumulative impacts are generally smaller.

Figure O - 19: Average Annual Carbon Emissions by Carbon Reduction Policy Scenario
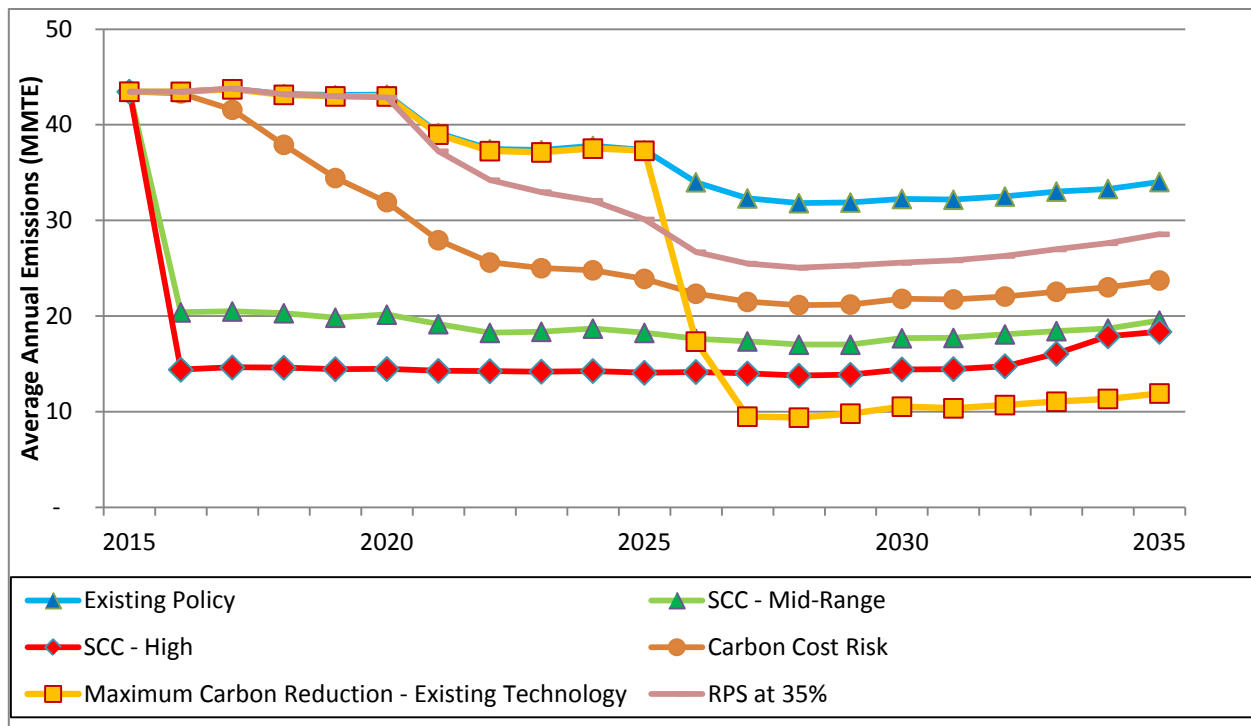
The **Carbon Cost Risk** and **RPS at 35%** scenarios gradually reduce emissions, while the Maximum Carbon Reduction scenario dramatically reduces emission as existing coal and inefficient gas plants are retired post-2025. The difference in timing results in large differences in the cumulative carbon emissions reductions for these policies. All scenarios show gradually increasing emissions beginning around 2028 as the amount of annual conservation development slows due to the completion of cost-effective and achievable retrofits. This lower level of conservation no longer offsets regional load growth, leading to the increased use of CO2 emitting generation.

Figure O - 20 shows the cumulative reduction in carbon emissions for the carbon reduction policy scenarios compared to the **Existing Policy** scenario.

Figure O - 20: Cumulative 2016 to 2035 Carbon Emissions Reductions for Carbon Policy Scenarios
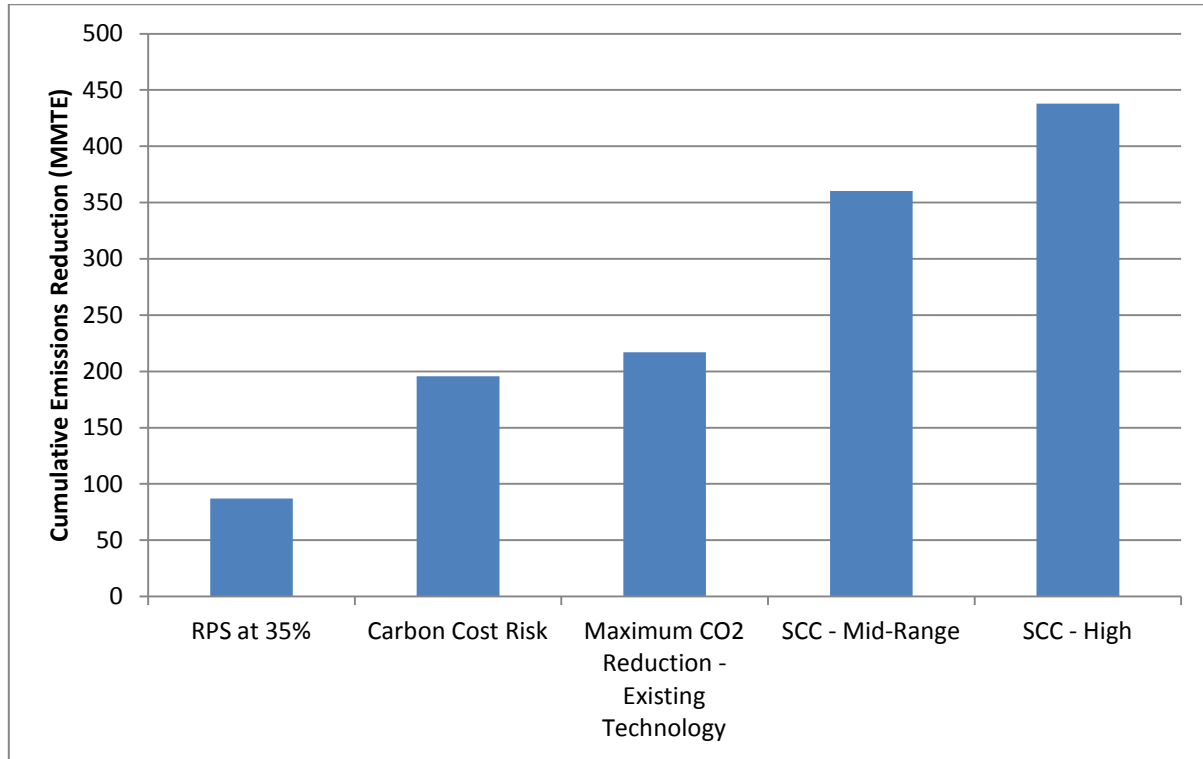
A comparison of Figure O - 19 and Figure O - 20 shows that the largest cumulative emissions reductions do not necessarily result from policy options that produce the lowest emission rate in 2035. For example, both social cost of carbon scenarios result in higher emission levels _in_ 2035 than the **Maximum Carbon Reduction – Existing Technology** scenario. However, both social cost of carbon scenarios also produce much larger cumulative reductions over the entire planning period.

It should be noted, that the differences in cumulative emissions across these policy options are largely an artifact of the scenario modeling assumptions, which assume immediate imposition of the social cost of carbon. It is unlikely that such large carbon damage cost would or could be imposed in a single step without serious economic disruption. Therefore, the cumulative carbon emission reductions from the implementation of a carbon pricing policy which phases in carbon cost over time, similar to the **Carbon Cost Risk** scenario, are likely more representative of the actual impacts of imposing a carbon price based on the social cost of carbon.

Table O - 4 shows cumulative emissions reduction in carbon from the **Existing Policy** for the five carbon reduction policy options and the incremental system cost net of carbon tax revenues. Table O - 4 reveals that three carbon pricing policies have roughly comparable cost per unit of carbon dioxide emission reduction, ranging from $2 to $4 per metric ton. The **Maximum Carbon Reduction – Existing Technology** scenario, as can be seen from Figure O - 19, results in the lowest average

annual carbon emissions from the regional power system by 2035, but also has a significantly higher average system cost and cost per unit of carbon dioxide reduction ($90/metric ton).

It should be noted that the direct cost of the resource strategies shown for the three carbon-pricing policies are likely understated. This is because all of three scenarios, but especially the two social cost of carbon scenarios, result in immediate and significant reductions in the dispatch of the region's existing coal-fired generation in the model. In practice, at such reduced levels of dispatch, most or all of these plants would likely be retired as uneconomic. As a result, the actual direct cost of carbon reduction under these scenarios would probably be closer to the **Maximum Carbon Reduction – Existing Technology** scenario.

Table O - 4: Average Cumulative Emissions Reductions and Present Value Cost of Alternative Carbon Emissions Reduction Policies Compared to Existing Policy Scenario

CO2 Emissions - PNW System 2016 - 2035 (MMTE)	Cumulative Emission Reduction Over Existing Policy Scenario (MMTE)	Incremental Average System Cost Net of Carbon Tax Revenues Over Existing Policy Scenario (billion 2012$)	Present Value Average Cost/Metric of Carbon Emissions Reduction (2012$/Metric Ton)
SCC - Mid-Range	360	$ 0.8	$ 2
SCC - High	438	$ 1.5	$ 4
Carbon Cost Risk	196	$ 0.7	$ 3
Maximum Carbon Reduction - Existing Technology	217	$ 19.6	$ 90
RPS at 35%	87	$ 33.9	$ 389

In the analysis shown above, only the cost incurred during the planning period (i.e. 2016-2035) and the emissions reductions that occur during this same time frame are considered. Clearly, investments made to reduce carbon emissions will continue beyond 2035, as will their carbon emissions impacts. These "end-effects" could alter the perceived relative cost-efficiency of carbon reduction policy options. For example, over a longer period of time, the cumulative emissions reductions from the **Maximum Carbon Reduction – Existing Technology** scenario could exceed those from the **Social Cost of Carbon – Mid-Range** scenario because by 2035 the **Maximum Carbon Reduction – Existing Technology** scenario results in 8 MMTE per year lower emissions. In this instance, if the difference in emission rates for these two scenarios were to remain the same for an additional 20 years, then their cumulative emissions reductions over 40 years would be nearly identical. Considering these "end effects", care should be exercised inferring the most effective method for reducing carbon emissions. The cumulative emissions reductions shown in Table O - 4 can be misleading if not considered with the context of these effects.

Maximum Carbon Reduction – Emerging Technology

In the preceding discussion the lower bound on regional power system carbon dioxide emissions was limited by existing technology. Under that constraint, the annual carbon dioxide emissions from the regional power system could be reduced from an average of 55 million metric tons per year today to approximately 12 million metric tons in 2035.[8] While this represents nearly an 80 percent reduction in emissions, it does not eliminate power system carbon dioxide emissions entirely. In order to achieve that policy goal, new and emerging technology must be developed and deployed.

To assess the magnitude of potential additional carbon dioxide emission reductions that might be feasible by 2035, the Council created a resource strategy based on energy efficiency resources and non-carbon dioxide emitting generating resource alternatives that might become commercially viable over the next 20 years. While the Regional Portfolio Model (RPM) was used to develop the amount, timing and mix of resources in this resource strategy, no economic constraints were taken into account. That is, the RPM was simply used create a mix of resources that could meet forecast energy and capacity needs, but it made no attempt to minimize the cost to do so. The reason the RPM's economic optimization logic was not used is that the future cost and resource characteristics of many of the emerging technologies included in this scenario are highly speculative.

Tables O - 5 and O - 6 summarize the potential resource size and cost of energy efficiency and generating resource emerging technologies considered in this scenario that were modeled in the RPM. A review of Table O - 5 shows that an additional 650 average megawatts of emerging energy efficiency technology could be deployed by 2025. If this technology were cost-effective to acquire, it could reduce winter peak demands in that year by 1,350 megawatts. Five years later, by 2030, potential annual energy savings could reach 1,125 average megawatts and reduce winter peak demands by 2,350 megawatts. Only about one-third of these potential savings is currently forecast to cost less than $30 per megawatt-hour and the remaining two-thirds of the potential savings is anticipated to cost more than $80 per megawatt-hour. See Chapter 12 and Appendix G for a more detailed discussion of these emerging energy efficiency technologies.

The regional potential of both utility scale and especially distributed solar PV resources, as shown in Table O - 6, is quite large. Assuming significant cost reductions in utility scale solar PV system installations by 2030, the levelized cost of power produced from such systems could be around $50 per megawatt-hour. However, while both utility scale and distributed solar PV systems can significantly contribute to meeting summer peak requirements, they provide little or no winter peak savings. In the near term, this limits their applicability to the region's needs. However, since the region's summer peak demands are forecast to grow more rapidly than winter peak demands, the system peak benefits of these systems are expected to increase over time. See Chapter 11 and Appendix H for a more detailed discussion of these emerging technologies.

Figure O - 21 shows the distribution of annual carbon dioxide emissions in 2035 for both the **Maximum Carbon Reduction – Existing Technology** and **Maximum Carbon Reduction – Emerging Technology** scenarios. Inspection of Figure O - 21 reveals that with existing technology

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[8] Average regional power system carbon dioxide emissions from 2000 – 2012 were approximately 55 million metric tons.

carbon dioxide emissions can be reduced to 12 million metric tons per year by 2035. If the emerging energy efficiency and renewable resource technologies shown in Tables O - 5 and O - 6 are available for deployment, carbon dioxide emissions in 2035 could be reduced to 6 million metric tons per year. The range in annual carbon dioxide emissions for both scenarios is largely driven by Northwest hydroelectric generation output and future load growth. However, under the scenario where emerging technology becomes available, the range of future emissions is narrower, largely due to less reliance on natural gas-fired generation under low water conditions.

Table O - 5: Energy Efficiency Emerging Technologies Modeled in the RPM in the Maximum Carbon Reduction – Emerging Technology Scenario

Emerging Technology	Regional Potential - 2025			Regional Potential - 2030		
	Energy (aMW)	Winter Peak Capacity (MW)	TRC Net Levelized Cost (2012$ /MWh)	Energy (aMW)	Winter Peak Capacity (MW)	TRC Net Levelized Cost (2012$ /MWh)
Additional Advances in Solid-State Lighting	200	400	$0-$30	400	800	$0-$30
CO₂ Heat Pump Water Heater	110	200	$100-150	160	300	$90-140
CO₂ Heat Pump Space Heating	50	160	$130-170	130	350	$110-160
Highly Insulated Dynamic Windows - Commercial	20	130	$500+	35	200	300
Highly Insulated Dynamic Windows - Residential	80	230	$500+	120	350	400
HVAC Controls – Optimized Controls	140	230	$90-120	200	350	$80-110
Evaporative Cooling	50	0*	$100-130	80	0*	$90-120
Total	650	1,350	N/A	1,125	2,350	N/A

Table O - 6: Non-Carbon Dioxide Emitting Generating Emerging Technologies Modeled in the RPM in the Maximum Carbon Reduction – Emerging Technology Scenario

Year	Utility Scale 48 MW Solar PV Plant – Southern Idaho				Utility Scale 48 MW Solar PV Plant – Kelso WA				Distributed Solar (Residential and Commercial Sectors)			
	Potential regional installed capacity = 528 MW				Potential regional installed capacity = 1,440 MW				Potential regional installed capacity = 28,100 MW			
	Energy (aMW)	Winter Peak (MW)	Summer Peak (MW)	Real Levelized Cost (2012$ /MWh)	Energy (aMW)	Winter Peak (MW)	Summer Peak (MW)	Real Levelized Cost (2012$ /MWh)	Energy (aMW)	Winter Peak (MW)	Summer Peak (MW)	Real Levelized Cost (2012$ /MWh)*
2020	12	-	24	$66	9	-	24	$89	340	2	700	$180
2025	12	-	24	$58	9	-	24	$77	1350	6	2800	$170
2030	12	-	24	$51	9	-	24	$68	2880	13	6000	$150
2035	12	-	24	$51	9	-	24	$67	4000	18	8300	$150
*High penetration of distributed solar resources will likely require additional integration cost and distribution system upgrades												

Figure O - 21: Distribution of Annual Carbon Dioxide Emissions Under Maximum Carbon Reduction Scenarios With and Without Emerging Technology
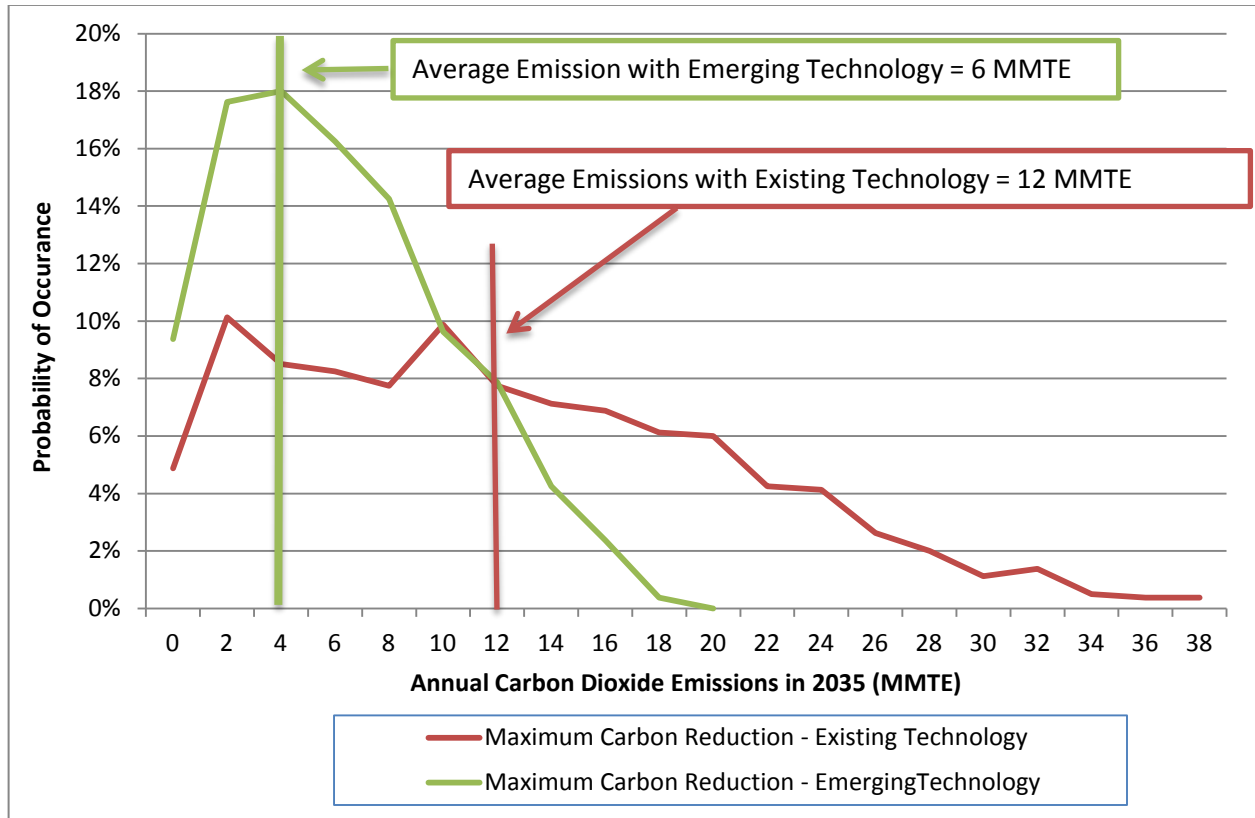
The difference in annual resource dispatch over time between the **Maximum Carbon Reduction – Emerging Technology** scenario and **the Maximum Carbon Reduction – Existing Technology** scenario is shown in Figure O - 22. As can be observed from Figure O - 22 the primary differences is the increased amount of energy efficiency and renewable resources developed (shown by the bars above the origin on the vertical axis) under the emerging technology scenario and less reliance on both existing and new gas-fired generation (shown by the wedges below the origin on the vertical axis). It should be emphasized that under the emerging technology scenario this tradeoff between new natural gas generation and emerging conservation and renewable resource development _is not_ based on economics. Rather, their development occurs because new natural gas-fired generation was specifically excluded from consideration under the emerging technology scenario.

Figure O - 22 shows that under the **Maximum Carbon Reduction – Emerging Technology** scenario just over 2,000 average megawatts of gas-fired generation must be displaced by approximately 2,500 average megawatts of renewable resources and 1,750 average megawatts of additional energy efficiency. The large difference in the amount of natural gas resources displaced versus the amount of conservation and renewable resources added reflects the limited contribution to supplying winter peak demands provided by solar PV and wind resources.

In order to lower the cost of achieving the carbon emissions reductions in the **Maximum Carbon Reduction - Emerging Technology** scenario and/or to further reduce the power system's carbon

emissions requires the development of non-greenhouse gas emitting technologies that can provide both annual energy and winter peak capacity.

Figure O - 22: Difference in Annual Resource Dispatch Between Maximum Carbon Reduction – Existing Technology Scenario and Maximum Carbon Reduction – Emerging Technology Scenario
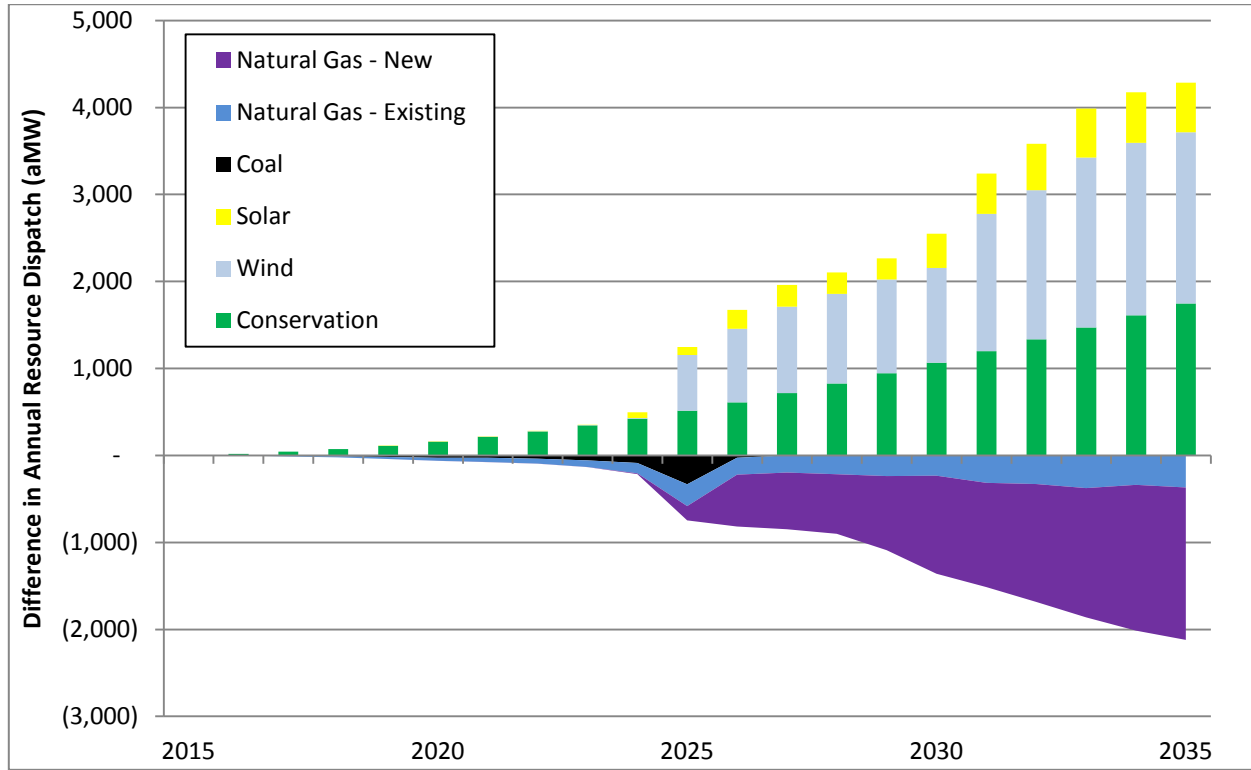
The most promising of these technologies in the Northwest are enhanced geothermal, solar PV with battery storage and small modular nuclear reactors. The potential costs, annual energy, winter and summer peak contribution of these resources are shown in Tables O - 7 and O - 8.

Both enhanced geothermal and small modular reactors can provide year-round generation and can, within limits, be dispatched based on resource need. However, neither of these technologies, even if proven, is likely to contribute significantly to regional energy needs until post-2025. In contrast, solar PV with battery storage offers more near-term potential for meeting much of the region's summer energy needs as well as supplying more or all of the summer system peak demand. The current cost of such PV systems, however, is not economically competitive with gas-fired generation. See Chapter 11 for a more detailed discussion of these emerging technologies.

The key findings from the Council's assessment of the potential to reduce power system carbon dioxide emissions are:

- The maximum deployment of existing technology could reduce regional power system carbon dioxide emissions from approximately 55 million metric ton today to about 12 million metric tons, or by nearly 80 percent in 2035. The cost of this resource strategy is approximately $20 billion more than the Existing Policy's least cost resource strategy.

- With development and deployment of emerging energy efficiency and non-carbon emitting resource technologies, it may be possible to reduce 2035 regional power system carbon dioxide emissions to approximately 6 million metric tons, or to about 50 percent below the level achievable with existing technology by 2035.
- At present, it is not possible to entirely eliminate carbon dioxide emissions from the power system without the development and deployment of emerging technology for both energy efficiency and non-carbon dioxide emitting generation that require technological or cost breakthroughs.
- Deployment of variable output renewable resources at the scale considered in the **Maximum Carbon Reduction – Emerging Technology** scenario will presents significant power system operational challenges.

Table O - 7: Enhance Geothermal and Small Modular Reactor Emerging Technologies' Potential Availability and Cost

| | Enhanced Geothermal Systems | | | | Small Module Reactors | | | |
| | Potential Installed Capacity by 2035 = 5025 MW | | | | Potential Installed Capacity by 2035 = 2580 MW | | | |
Year	Energy (aMW)	Winter Peak (MW)	Summer Peak (MW)	Real Levelized Cost (2012$ /MWh)	Energy (aMW)	Winter Peak (MW)	Summer Peak (MW)	Real Levelized Cost (2012$ /MWh)
2025	310	345	345	$102	513	520	520	$95
2030	1,485	1,650	1,650	$73	1,026	1,140	1,140	$88
2035	4,522	5,025	5,025	$58	2,053	2,280	2,280	$81

Table O - 8: Utility Scale Solar PV with Battery Storage Emerging Technologies' Potential Availability and Cost

| | 48 MW Solar PV Plant with 10 MW Battery System – Roseburg OR | | | | 48 MW Solar PV Plant with 10 MW Battery System – Kelso WA | | | |
| | Regional Potential – Nearly Infinite | | | | Regional Potential – Nearly Infinite | | | |
Year	Energy (aMW)	Winter Peak (MW)	Summer Peak (MW)	Real Levelized Cost (2012$ /MWh)	Energy (aMW)	Winter Peak (MW)	Summer Peak (MW)	Real Levelized Cost (2012$ /MWh)
2020	10	9	24	$123	9	9	24	$139
2025	10	9	24	$102	9	9	24	$115
2030	10	9	24	$86	9	9	24	$97
2035	10	9	24	$85	9	9	24	$96

Federal Carbon Dioxide Emission Regulations

As the Seventh Power Plan was beginning development, the US Environmental Protection Agency (EPA) issued proposed rules that would limit the carbon dioxide emissions from new and existing power plants. Collectively, the proposed rules were referred to as the Clean Power Plan. In early August of 2015, after considering nearly four million public comments, the EPA issued the final Clean Power Plan (CPP) rules. The "111(d) rule," refers to the Section of the Clean Air Act under which EPA regulates carbon dioxide emissions for existing power plants. The CPP's goal is to reduce national power plant CO_2 emissions by 32 percent from 2005 levels by the year 2030. This is slightly more stringent than the draft rule which set an emission reduction target of 30 percent. Along

with the 111(d) rule, the EPA also issued the final rule under the Clean Air Act section 111(b) for new, as opposed to existing, power plants and the EPA also proposed a federal plan and model rules that would combine the two emissions limits.

To ensure the 2030 emissions goals are met, the CPP requires states begin reducing their emissions no later than 2022 which is the start of an eight year compliance period. During the compliance period, states need to achieve progressively increasing reductions in CO2 emissions. The eight year interim compliance period is further broken down into three periods, 2022-2024, 2025-2027, and 2028-2029, each associated with its own interim emission reduction goals.

Under the EPA's final rules, states may comply by reducing the average carbon emission rate (pounds of CO2 per kilowatt-hour) of all power generating facilities located within their state that are covered by the rule. In the alternative, states may comply by limiting the total emissions (tons of CO2 per year) from those plants. The former compliance option is referred as a "rate-based" path, while the latter compliance option is referred to as a "mass-based" path. Under the "mass-based" compliance option, EPA has set forth two alternative limits on total CO2 emissions. The first, and lower limit, includes only emissions from generating facilities either operating or under constructions as of January 8, 2014. The second, and higher limit, includes emissions from both existing and new generating facilities, effectively combining the 111(b) and 111(d) regulations.

The Council determined that a comparison of the carbon emissions from alternative resource strategies should be based on the emissions from both existing and new facilities covered by the EPA's regulations. This approach is a better representation of the total carbon footprint of the region's power system and is more fully able to capture the benefits of using energy efficiency as an option for compliance because it reduces the need for new generation. Table O - 9 shows the final rule's emission limits for the four Northwest states for the "mass-based" compliance path, including both existing and new generation.

Table O - 9: Pacific Northwest States' Clean Power Plan Final Rule CO2 Emissions Limits[9]

Mass Based Goal (Existing) and New Source Complement (Million Metric Tons)					
Period	Idaho	Montana	Oregon	Washington	PNW
Interim Period 2022-29	1.49	11.99	8.25	11.08	32.8
2022 to 2024	1.51	12.68	8.45	11.48	34.1
2025 to 2027	1.48	11.80	8.18	10.95	32.4
2028 to 2029	1.48	11.23	8.06	10.67	31.4
2030 and Beyond	1.49	10.85	8.00	10.49	30.8

[9] Note: EPA's emissions limits are stated in the regulation in "short tons" (2000 lbs). In Table O - 9 and throughout this document, carbon dioxide emissions are measured in "metric tons" (2204.6 lbs) or million metric ton equivalent (MMTE).

EPA's regulations do not cover all of the power plants used to serve Northwest consumers. Most notably, the Jim Bridger coal plants located in Wyoming serve the region, but are not physically located within regional boundaries defined under the Northwest Power Act[10]. In addition, there are many smaller, non-utility owned plants that serve Northwest consumers located in the region, but which are not covered by EPA's 111(b) and 111(d) regulations. Therefore, in order for the Council to compare EPA's CO2 emissions limits to those specifically covered by the agency's regulations it was necessary to model a sub-set of plants in the region. Table O - 10 shows the fuel type, nameplate generating capacity for the total power system modeled by the Council and the nameplate capacity and fuel type of those covered by the EPA's Clean Power Plan regulations modeled for purposes of comparison to the 111(b) and 111(d) limits shown in Table O - 9.

Table O - 10: Nameplate Capacity of Thermal Generation Covered by EPA Carbon Emissions Regulations Located Within Northwest States

Fuel Type	Modeled for Total PNW Power System Emissions Nameplate Capacity (MW)	Modeled Generation Affected by EPA 111(b)/111(d) Emissions Limits (MW)
Total	16,787	12,044
Coal	7,349	4,827
Natural Gas	9,329	7,218
Oil/Other	109	0

Under the Clean Power Plan, each state is responsible for developing and implementing compliance plans with EPA's carbon dioxide emissions regulations. However, the Council's modeling of the Northwest power system operation is not constrained by state boundaries. That is, generation located anywhere within the system is assumed to be dispatched when needed to serve consumer demands regardless of their location. For example, the Colstrip coal plants are located in Montana, but are dispatched to meet electricity demand in other Northwest states. Consequently, the Council's analysis of compliance with EPA's regulations can only be carried out at the regional level. While this is a limitation of the modeling, it does provide useful insight into what regional resource strategies can satisfy the Clean Power Plan's emission limits.

Figure O - 23 shows the annual average carbon dioxide emissions for the least cost resource strategy identified under each of the major scenarios and sensitivity studies evaluated during the development of the Seventh Power Plan. The interim and final Clean Power Plan emission limits aggregated from the state level to the regional level is also shown in this figure (top heavy line). Figure O - 23 shows that all of the scenarios evaluated result in average annual carbon emissions

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[10] The Power Act defines the "Pacific Northwest" as Oregon, Washington, Idaho, the portion of Montana west of the Continental Divide, "and such portions of the States of Nevada, Utah, and Wyoming as are within the Columbia River drainage basin; and any contiguous areas, not in excess of seventy-five air miles from [those] area[s]… which are a part of the service area of a rural electric cooperative customer served by the Administrator on December 5, 1980, which has a distribution system from which it serves both within and without such region." (Northwest Power Act, §§ 3(14)(A) and (B).)

well below the EPA limits for the region. This includes two of the scenarios that were specifically designed to "stress test" whether the region would be able to comply with s the Clean Power Plan's emission limits if one or more existing non-carbon emitting resources in the region were taken out of service.

In the **Unplanned Loss of a Major Resource** scenario, it was assumed that a single large resource that does not emit carbon dioxide with 1,200 megawatts of nameplate capacity, producing 1,000 average megawatts of energy would randomly and permanently discontinue operation sometime over the next 20 years. Because this scenario was designed to test the vulnerability of the region's ability to comply with the Clean Power Plan's emission limits in 2030, it was assumed that there was a 75 percent probability that this resource would discontinue operation by 2030 and a 100 percent probability it would do so by 2035. In the second scenario, the **Planned Loss of a Major Resource**, it was assumed that a total of 1,000 megawatts nameplate capacity producing 855 average megawatts of energy resources that do not emit carbon dioxide were retired by 2030. A review of Figure O - 23 shows that under both scenarios the average regional carbon dioxide emissions are well below the EPA's limits for 2030 and beyond.

One of the key findings from the Council's analysis is that *from a regional perspective* compliance with EPA's carbon emissions rule should be achievable without adoption of additional carbon reduction policies in the region. This is not to say that no additional action is required.

All of the least cost resource strategies that have their emission levels depicted in Figure O - 23 call for the development of between 4,000 and 4,600 average megawatts of energy efficiency by 2035. All of these resource strategies also assume that the retiring Centralia, Boardman and North Valmy coal plants are replaced with only those resources required to meet regional capacity and energy adequacy requirements. Utility development of new gas-fired generation to meet local needs for ancillary services, such as wind integration, or capacity requirements beyond the modest levels included under these scenarios are not modeled and would increase regional emissions. All of the least cost resource strategies also assume that Northwest electricity generation is dispatched to meet regional adequacy standards for energy and capacity rather than to serve external markets.

Figure O - 23: Average Annual Carbon Dioxide Emissions for Least Cost Resource Strategies by Scenario for Generation Covered by the Clean Power Plan and Located Within Northwest States
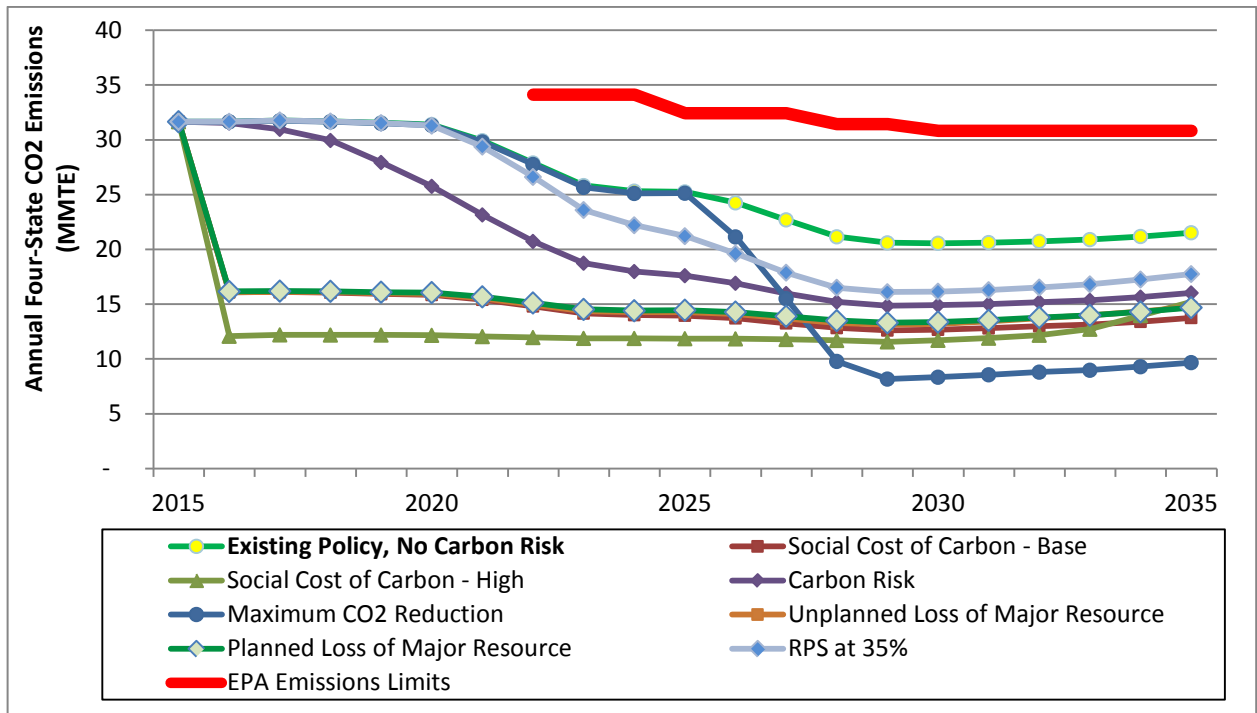
Resource Strategy Cost and Revenue Impacts

The Council's Regional Portfolio Model (RPM) calculates the net present value cost to the region of each resource strategy to identify the strategies that have both low cost and low risk. The RPM includes only the forward-going costs of the power system; that is, only those costs that can be affected by future conditions and resource decisions. Figure O - 24 shows the present value system cost for the principal scenarios evaluated during the development of the Seventh Power Plan. Figure O - 24 also shows the present value of power system costs both with and without assumed carbon tax revenues. That is, the scenarios that assumed some form of carbon price include not only the direct cost of building and operating the resource strategy, but also the revenues from carbon dioxide taxes assumed in those scenarios. Of course those scenarios without a carbon price, the **Low Gas Price** and **Existing Policy** scenarios have the same average system cost in both cases.

Figure O - 24: Average Net Present Value System Cost for the Least Cost Resource Strategy by Scenario With and Without Carbon Tax Revenues
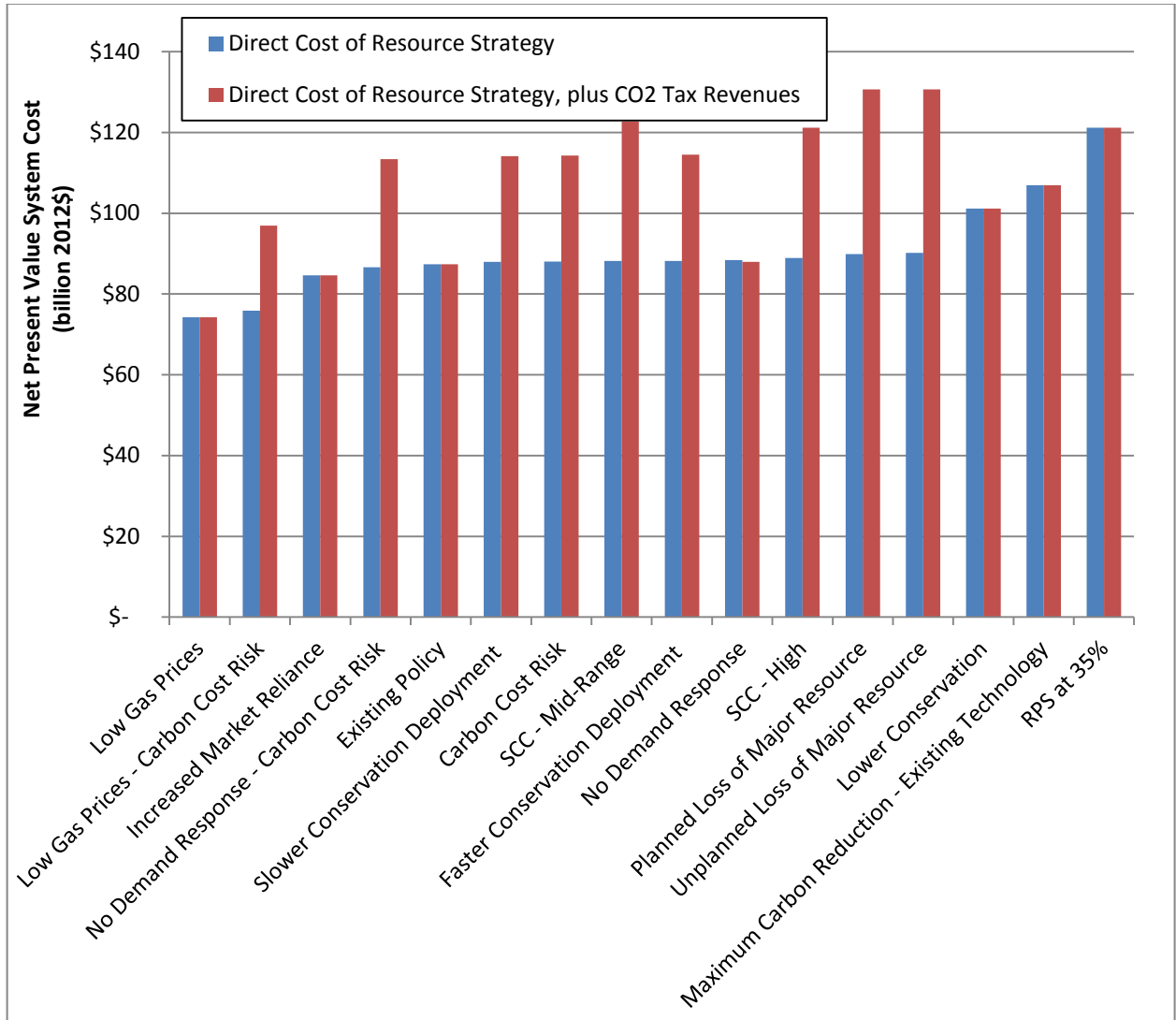
Inspection of Figure O - 24 shows that, exclusive of carbon costs, the average net present value system cost for the least cost resource strategies across several of the scenarios are quite similar.

Table O - 11 shows that only three scenarios (the **Maximum Carbon Reduction – Existing Technology**, **Lower Conservation and RPS at 35%)** have average system costs that differ significantly from the **Existing Policy** scenario. This is due largely to the fact that the components of the least cost resource strategies across the other scenarios are very similar. In the case of the **Maximum Carbon Reduction – Existing Technology** scenario, all of the coal plants that serve the region are assumed to be retired as are existing gas plants with heat rates over 8,500 Btu/kilowatt-hour. As a result, the present value system cost is significantly increased by the capital investment needed in replacement resources, largely new combined-cycle combustion turbines. Note that under both **Social Cost of Carbon** scenarios and the **Carbon Cost Risk** scenario, coal plants serving the region dispatch relatively infrequently. As a result, such plants might be viewed by their owners as uneconomic to continue operation. If this is indeed the case, the average present value system cost

of these scenarios would likely be much closer to the **Maximum Carbon Reduction – Existing Technology** scenario.

The least cost resource strategy under the **Lower Conservation** scenario develops about 1,200 average megawatts less energy savings and 2,900 megawatts less of winter peak capacity from energy efficiency by 2035 than the **Existing Policy** scenario. As a result, its average system cost is nearly $14 billion higher because it must substitute more expensive generating resources to meet the region's needs for both capacity and energy.

Under the **Regional 35 Percent RPS** scenario, the increase in average present value system cost stems from the investment needed to develop a significant quantity of additional wind and solar generation in the region to satisfy the higher standard. The average present value system cost for the least cost resource strategy under the **Increased Market Reliance** scenario is lower because fewer resources are developed in the region to meet regional resource adequacy standards, resulting in lower future costs.

Table O - 11: Average Net Present Value System Cost with Carbon Cost and Incremental Cost Compared to Existing Policy, No Carbon Risk Scenario

Scenario	System Cost Without Carbon Tax Revenues (billion 2012$)	Incremental Cost Over Existing Policy Scenario (billion 2012$)
Existing Policy	$87	
Social Cost of Carbon – Mid-Range	$88	$0.8
Social Cost of Carbon – High-Range	$89	$1.5
Carbon Risk	$88	$0.7
Maximum CO2 Reduction – Existing Technology	$107	$19.6
Unplanned Loss of Major Resource	$90	$2.8
Planned Loss of Major Resource	$90	$2.5
Faster Conservation Deployment	$88	$0.8
Slower Conservation Deployment	$88	$0.6
Increased Reliance on External Markets	$85	($2.7)
Regional 35 Percent RPS	$121	$33.9
Lower Conservation – No Carbon Risk	$101	$13.8

Reporting costs as net present values does not show patterns over time and may obscure differences among individual utilities. The latter is unavoidable in regional planning and the Council has noted throughout the plan that different utilities will be affected differently by alternative policies. It is possible, however, to display the temporal patterns of costs among scenarios. Figure O - 25 shows forward-going power system costs for selected scenarios on an annual basis.

Forward-going costs include only the future operating costs of existing resources and the capital and operating costs of new resources. The 2016 value in Figure O - 25 includes mainly operating costs of the current power system, but not the capital costs of the existing generation, transmission, and distribution system since these remain unchanged by future resource decisions. The cost shown for

the two Social Cost of Carbon scenarios and the Carbon Cost Risk scenario include carbon tax revenues.

Figure O - 25: Annual Forward-Going Power System Costs, Including Carbon Costs
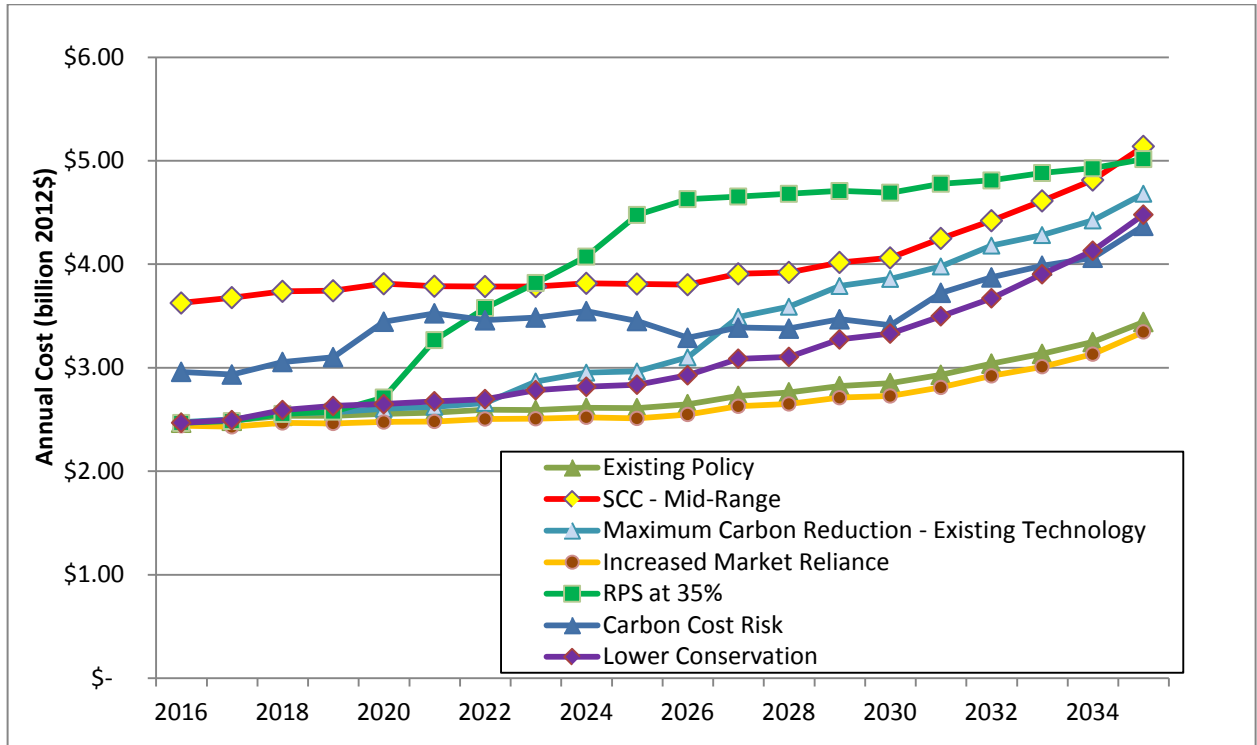
A review of Figure O - 25 shows that power system costs increase over the forecast period even in the **Existing Policy** scenario due to investments in energy efficiency, demand response, resources needed to comply with existing renewable portfolio standards, and gas-fired generation to meet both load growth and replace capacity lost through announced coal plant retirements. The resource strategies with the highest cost are those that include either carbon cost (the **Social Cost of Carbon** scenarios and **Carbon Cost Risk**) or those that were specifically designed to reduce future carbon emissions (**Maximum CO2 Reduction – Existing Technology**, **RPS at 35%**). The **Carbon Risk and Lower Conservation** least cost resource strategies have comparable annual costs towards the end of the planning period. The rapid increase in the annual cost for the least cost resource strategy in the **RPS at 35%** scenario occurring post-2020 results from increased investments in renewable resources beyond current state standards in order to satisfy the higher standard by 2030.

Four of the scenarios assume no carbon regulatory compliance cost or damage costs**: Existing Policy**, **Maximum Carbon Reduction – Existing Technology**, **Lower Conservation** and **RPS at 35%**). Their forward going costs are identical with and without carbon cost. In order to compare the direct cost of the actual resource strategies resulting from carbon pricing policies with these four scenarios, it is necessary to remove the carbon cost from those other scenarios. Figure O - 26 shows the power system cost over the forecast period for the least cost resource strategy, excluding carbon tax revenues.

Figure O - 26: Annual Forward-Going Power System Costs, Excluding Carbon Tax Revenues
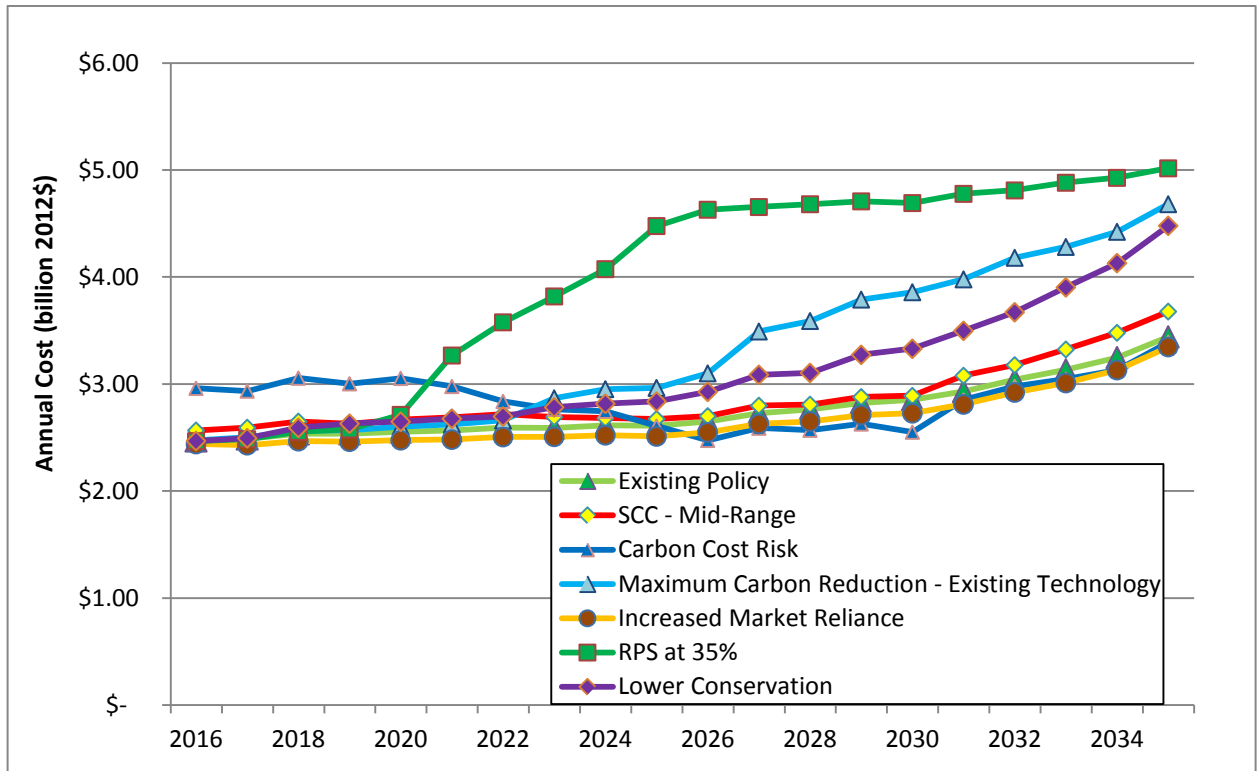

Figure O - 26 shows that the **Carbon Cost Risk** and **Increased Market Reliance** scenarios have lower costs post-2026 than the **Existing Policy** scenario. The **Lower Conservation** resource strategy shows higher annual system cost than all but two other resource strategies, the **RPS at 35%**) and **Maximum Carbon Reduction – Existing Technology** least cost resource strategies. The highest forward going revenue requirement, well above even the **Maximum Carbon Reduction – Existing Technology** scenario's least cost resource strategy is the **RPS at 35%** scenario. This strategy's high cost is due to not only to the high cost of renewable resources, but the cost of thermal resources that must still be added to the system to ensure winter peak needs are met.

To translate these planning costs to the changes that would likely be experienced by consumers in their rates and bills (or ratepayer costs), existing power system costs need to be included and some costs that are not recovered through utility electric revenues need to be excluded. Figure O - 27 shows an index of forecast total utility revenue requirements for the **Existing Policy** and the **Carbon Cost Risk** scenarios in the context of historical levels. For the **Carbon Cost Risk** scenario the higher line of forecasts includes average carbon costs as if they were entirely recovered through electricity revenues. The lower line assumes that revenues from carbon costs are "returned" to consumers by reductions in other taxes or credited directly back on their bills. A review of Figure O - 27 reveals that without carbon costs, the **Carbon Cost Risk** scenario results in slightly lower utility revenue requirements than the **Existing Policy** case. This result is due to its slightly higher development of energy efficiency, lower renewable resource development and greater reliance on gas compared to coal generation.

In the following section of this chapter these revenue requirements are translated into electric rates and typical residential customer monthly electricity bills. The addition of existing system costs makes

these impacts on consumers appear smaller than looking only at forward-going costs. The rate and bill effects are further dampened by the fact that conservation costs are not all recovered through utility rates. In fact, it becomes difficult to graphically distinguish among the effects of some of the scenarios.

Figure O - 27: Index of Historical and Forecast Utility Revenue Requirements
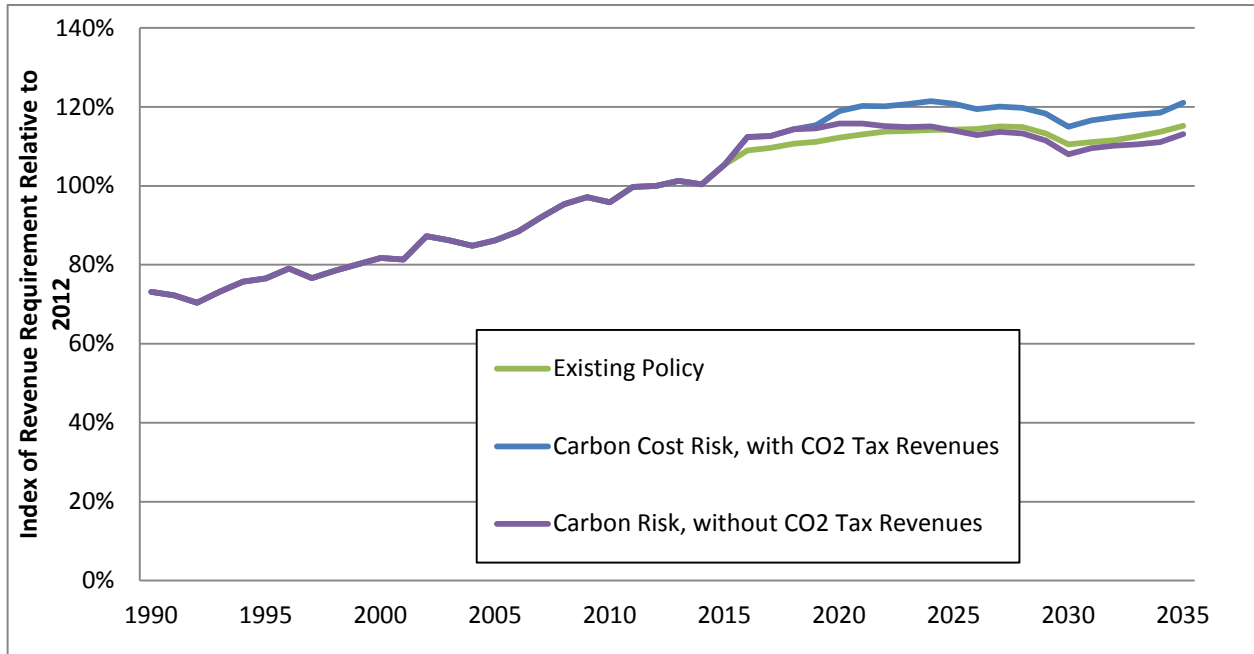
The changes in rates are small relative to system-cost changes. The primary reason is that revenue requirements contain a substantial amount of existing costs that do not change among the scenarios. The system costs used in planning exclude existing, or sunk costs and instead include only forward-going costs that could be affected by resource decisions. The effects of carbon reduction on rates are smaller than some participants in the Council's planning process expected. However, this may vary from one utility to the next. One reason is that conservation addresses much of the problem and it is low cost. A second reason is that the region is fortunate to have a low-carbon power system. Most of the carbon emissions come from a relatively small share of the generation that is fired by coal. Since three of the coal plants currently serving the region will be retired by 2026, a substantial amount of the cost of reducing carbon emissions is already internalized into the modeling of the existing system.

Figure O - 28 shows that the lowest average revenue requirement per megawatt-hour are in the **Lower Conservation**, **Social Cost of Carbon – Mid-Range** and **Carbon Cost Risk** scenarios. In the **Lower Conservation** scenario, the lower average revenue requirement is the result of spreading higher average total power system costs over larger number of megawatt-hours. In the **Social Cost of Carbon – Mid-Range** and **Carbon Cost Risk** scenarios, the lower average revenue requirements per megawatt-hour are the result of lowering average total power system cost even while reducing the number of megawatt-hours sold. Both the **Maximum Carbon Reduction – Existing Technology** and **RPS at 35%** resource strategies have higher average revenue

requirements per megawatt-hour, since these two strategies call for the most significant changes in regional resource mix.

Figure O - 28: Electricity Average Revenue Requirement per MWh Excluding Carbon Tax Revenues