Clean Power Plan: A Western and Utah Perspective on Compliance with the Rule

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Jeff Burks
Energy Strategies, LLC
Multiple pathways for state compliance

Rate-Based

Mass-Based

State Measures
Mass-Based
Three options for compliance through “trading-ready” plans

**Rate-Based**
- Apply Subcategory rates to EGUs
- Use State Goal
- Customized rates

**Mass-Based**
- Apply Mass-based standards to affected EGUs
- Apply mass-based standards to affected and new EGUs

**State Measures Mass-Based**
- Use mass-based state goal.
- Entities other than EGUs are responsible for compliance measures.
2030 Western States Rate-Based Goals (Trading Ready)
Western State Compliance under a Rate-Based Plan

Emission Reduction Credits (ERCs)

- AZ
- CO
- ID
- MT
- Navajo
- NM
- NV
- OR
- UT
- Ute
- WA
- WY

Total Planned ERC

2030 ERC for CPP Compliance Trading Ready
2030 Western States Mass-Based Goals (Trading Ready)

EPA 2030 Carbon Emission Goal (Short Tons)

Expected 2030 Carbon Emission (Short Tons)
Western State Compliance under a Mass-Based Plan

- Expected 2030 Carbon Emission (Short Tons)
- EPA 2030 Carbon Emission Goal (Short Tons)
Utah’s statewide projected compliance gap under a *rate-based* plan
Utah’s statewide projected compliance surplus under a mass-based plan

- CO₂ Emissions Cap
- Potential Surplus of Allowances

Projected 2030 CO₂ Emissions
Huntington Unit 1
CO₂ Emissions Compared to Goal

Short Tons

2010 2015 2020 2025 2030

Huntington Unit 1 CO₂ Emissions

First Year of Compliance 2022

CPP Emissions Goal for Huntington 1