

The Brattle Group

IRP Challenges of the Coming Decade

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NARUC

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Why Resource Planning Is So Difficult

IRP has become as much a question of regulatory philosophy as an analytic problem (though also that, and very difficult).

- ◆ Not just least-cost planning under cost-of-service, but also:
 - Competitive procurement/fostering wholesale (& retail) markets
 - Risk management – to limit customer bill volatility
 - Credit protection – to help developers & protect the utility
- ◆ Likely obsolescence of conventional technologies
- ◆ New possibilities, and old ones that need to work better
 - Some alternatives don't affect all customers
 - Some alternatives only work if we also change pricing and service delivery model
- ◆ And, there is extreme uncertainty surrounding all the major elements

Markets vs. (Re) regulation

Are wholesale markets working well enough? Retail? Should utility procurement be altered to improve or work around problem?

- ◆ If utilities reintegrate upstream, (gradually or partially), how will they alter market conditions?
 - Buy baseload units under very long-term contracts? Cost of Service?
 - Wholesale market just for “topping off?”
- ◆ Long-term contracts for secure development financing tend to exacerbate customer-switching risk
- ◆ Does public input improve resource decisions, or put more cost and risk on customers?

Credit Constraints Shaping Procurement

Developers often claim to need a long-term PPA (or feed-in tariffs) to obtain financing.

- ◆ Is this a market failure, or a market warning sign?
- ◆ Effectively saying customers should bear risks that unregulated shareholders won't (despite diversification and liquidity of their positions)

How much risk can utilities absorb for suppliers and customers, before their own health is jeopardized?

- ◆ Imputed debt from PPAs
- ◆ Mark-to-market and collateral obligations
- ◆ Counter-party risk if push exposure upstream

Should customer bear more cost-risk, in exchange for lower risk-premiums?

Risk Management Complications

Risk Management turns Least-Cost Planning on its head: *What plan/resource has least risk (highest benefit) for given expected cost? Not, What has least cost for given benefit?*

- ◆ Don't reduce risk for its own sake; do it to solve the problems the risk creates
- ◆ Risk not well-defined in common use
 - *Ex-ante* certainty or *ex-post* regret?
 - Absolute or relative?
 - Steady changes or abrupt (boiled frog)?
 - Time horizon?
- ◆ No free lunch: can't make the risk vanish, only change who bears it (suppliers, utility, customers)
- ◆ Requires regulatory collaboration: new goals, new tools, new standards

Driving Beyond the Headlights?

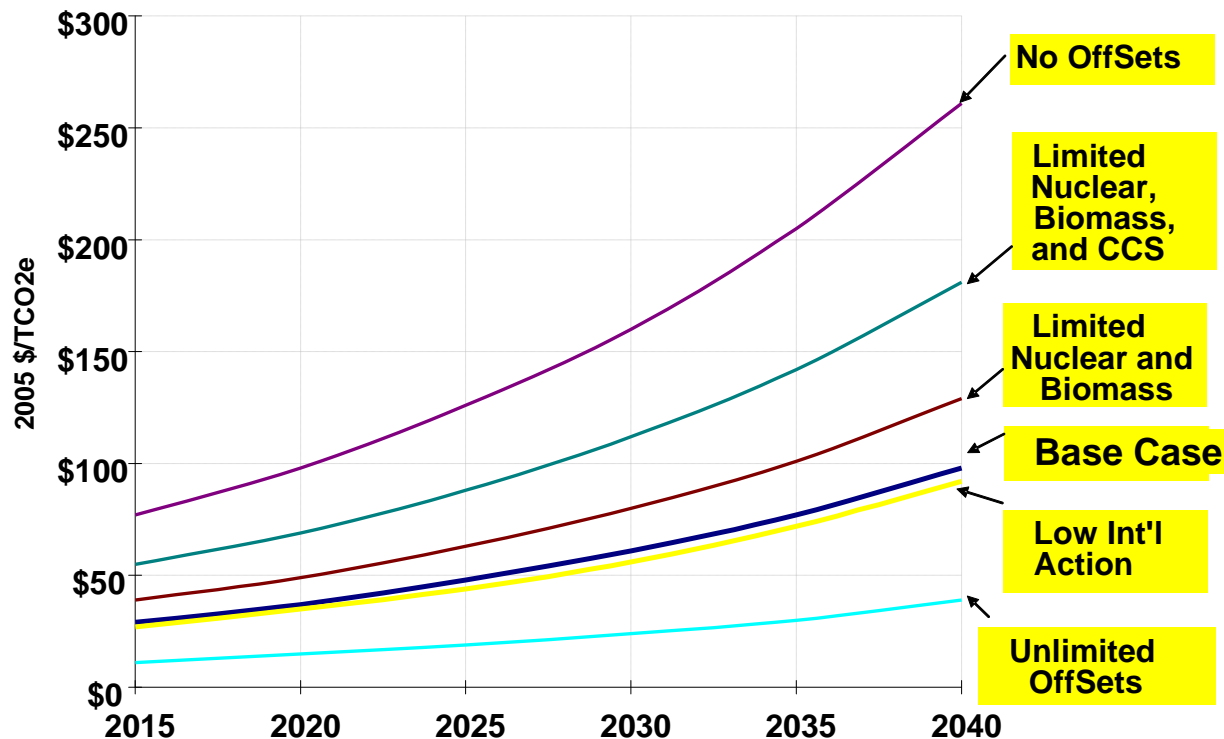
Traditional IRP takes a very long view. Unfortunately, about 10-15 years ahead, we can't see much with any confidence:

- ◆ CO₂ regs – how soon, how costly
 - Policy caps = ?
 - Offsets?
 - Fuel feedbacks?
 - RD&D support for critical technologies?
- ◆ Oil/OPEC/natural gas/LNG?
- ◆ Construction costs?
- ◆ Technology improvements in renewables'?
- ◆ Success of DR and RPS programs?
- ◆ New demands – PHEV?

CO₂ Cost Risk

CO₂ prices are likely to be as or more volatile than natural gas.

EPA GHG Allowance Price Scenarios under Lieberman-Warner

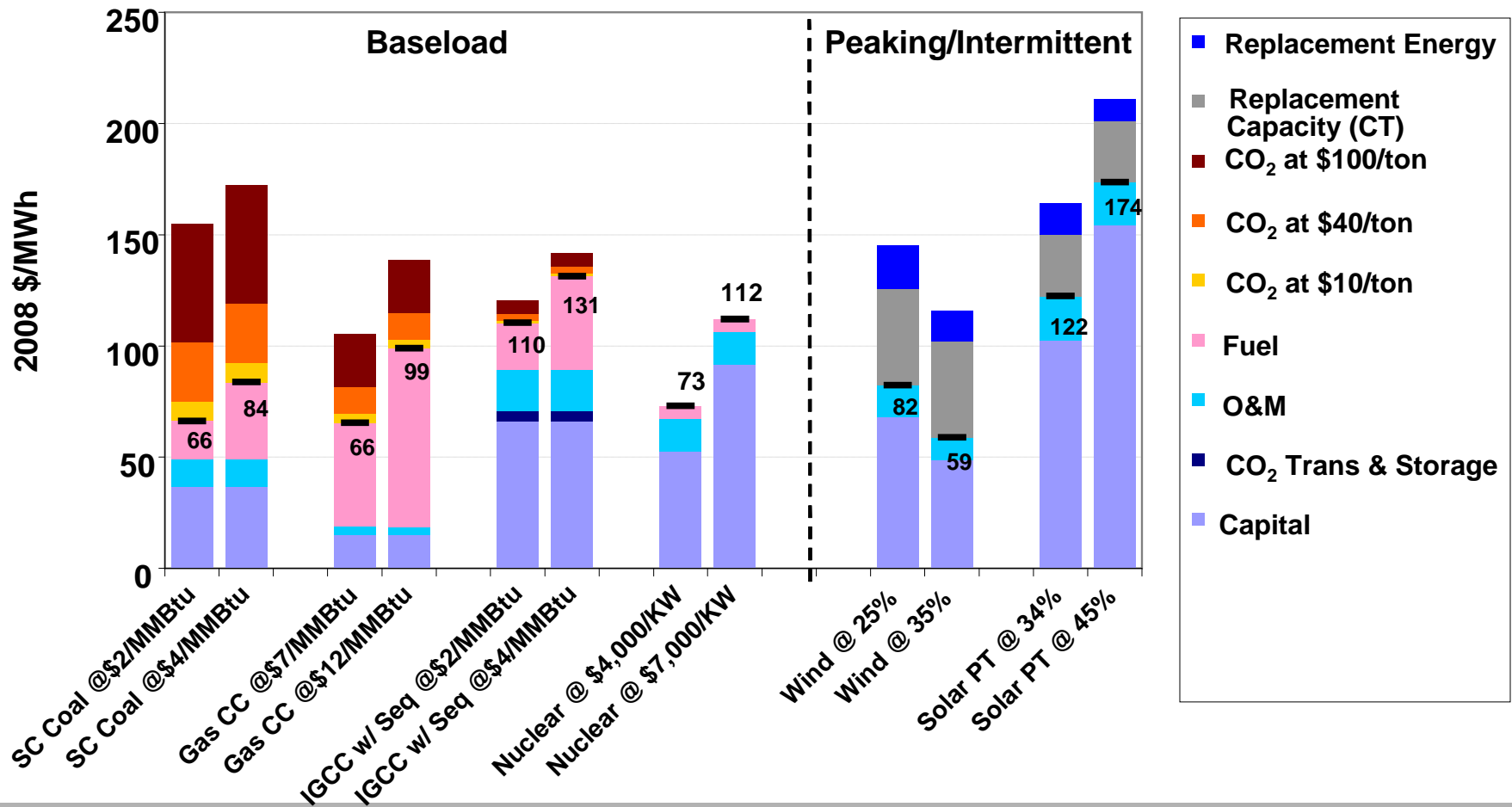


- Annual volatility greater than natural gas (40-50%/yr) plausible
- +/- \$10/ton CO₂ changes wholesale energy prices by about +/- \$6/MWh
- CO₂ potentially a large portion of wholesale electricity prices

Comparative Gen BusBar Costs

Least-cost resource depends critically on CO₂ and fuel prices:

Level Real New Generation Cost Estimates



Diversification

Given the fog, and lack of market hedges greater than a few years ahead, many utilities and commissions look to portfolio diversity as a partial cure for risk. But...

- ◆ Won't work like it does in financial markets, because many more attributes of electric service than just risk and return
 - Securities actually price risk: high risk → low cost → high returns
 - For gen, also care about location, dispatchability, emissions, time to build, etc.
 - Utility asset positions not liquid – can't get in and out
- ◆ Not just one kind of electricity risk, so no simple/single “efficient frontier”; many, each with its own tradeoffs (nuclear vs. solar as CO₂ hedge)
 - Fuel
 - Reliability
 - CO₂ exposure
 - Construction

As a result, it is difficult to use diversity as more than a tiebreaker.

Planned Obsolescence

In several areas, regulatory policy is fostering a new paradigm:

- ◆ Conventional fossil gen \Rightarrow clean gen \Rightarrow distgen
 - We are probably embarking on a path to zero net carbon emissions
 - CO₂ prices by 2030s should materially penalize coal and gas use, absent CCS
 - RPS standards promote new techs – but often more political basis than economic, and overlap between externality penalties
- ◆ Load growth and gen expansion
 - \Rightarrow conservation, DR, and decoupling
- ◆ AMI \Rightarrow Smart Grid \Rightarrow even Smarter Grid

We are in the transition phase, when old techs still need to be used knowing they could become unattractive, and new techs are emerging.

New Value-Proposition

Traditional utility planning is paternalistic, engineering- driven:
We buy what is good for customers, and they pay its costs.

- ◆ With Smart Grid, DR and conservation, distgen and CHP, possibility of a new business model:
 - Decentralized
 - Adaptive
 - Customer-driven
 - Customized
- ◆ Can the utility participate in value-added from improving customers' energy use?
 - Have to really know customers to make it work
 - Many new systems and capabilities needed: AMI, smart appliances, RTP, micro-grid controls, educated customers, new billing capabilities, incentives and performance metrics
- ◆ What is the boundary of utility services vs. ESCO, SEU, or deregulated subsidiary?

What to do?

- **Maintain/manage realistic expectations** – no one can get this complex problem “just right”
- **Minimize conflict** – e.g., with collaborative, exploratory and information sessions in lieu of formal hearings
- **Get educated** – in the new techniques of analysis (risk management) and engineering that will be needed
- **Specify problems explicitly** – don’t explore solutions without knowing what they are supposed to cure
- **Pursue flexibility** – modular, adjustable plans that don’t require placing large, long-term bets
- **Recognize inconsistencies** – between goals and policies that are in opposition (e.g., customer choice and long term fixed pricing)
- **Specify performance standards in advance** – that are related to what is controllable, and knowable; hold harmless for uncontrollable outcomes
- **Value long-term, but evaluate short term impacts**
- **Preserve/respect the market** – it is telling you something useful, even if you don’t believe it

Appendix: BusBar Cost Assumptions

Current Year 2010

	New Plants US													
	SC Coal		Adv CC		IGCC		IGCC w/		Adv		Wind		Solar	
	Low	High	Low	High	IGCC Low	High	Seq Low	Seq High	Nuclear	Nuclear	Wind	Wind	Solar	Solar
Overnight Cost	2,900	2,900	1,175	1,175	4,275	4,275	5,275	5,275	4,000	7,000	1,925	1,925	4,000	8,000
Interconnection Cost (Tx, Water)	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Overnight + Interconnect	2,950	2,950	1,225	1,225	4,325	4,325	5,325	5,325	4,050	7,050	1,975	1,975	4,050	8,050
Charge Rate	9.3%	9.3%	9.0%	9.0%	9.3%	9.3%	9.3%	9.3%	9.7%	9.7%	7.6%	7.6%	7.6%	7.6%
FOM	46.3	46.3	18.1	18.1	54.7	54.7	68.4	68.4	90.7	90.7	31.3	31.3	58.6	76.2
CO2 transport cost (250 km)	0.0	0.0	0.0	0.0	0.0	0.0	31.4	31.4	0.0	0.0	0.0	0.0	0.0	0.0
CO2 storage cost	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
VOM	5.9	5.9	1.5	1.5	7.1	7.1	9.7	9.7	0.5	0.5	0.0	0.0	0.0	0.0
Nuclear Spent Fuel & Decomm. Charge	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0
Fuel Price	2.00	4.00	7.00	12.00	2.00	4.00	2.00	4.00	0.54	0.54	0.0	0.0	0.0	0.0
Heat Rate	8,721	8,721	6,683	6,683	8,922	8,922	10,505	10,505	10,400	10,400	10,022	10,022	10,022	10,022
CO2 Rate	203	203	119	119	197.00	197.00	20	20	0	0	0	0	0	0
NCF	85%	85%	85%	85%	85%	85%	85%	85%	85%	85%	25%	35%	34%	45%

2008\$/MWh

Capital Costs	36.72	36.72	14.81	14.81	53.84	53.84	66.28	66.28	52.71	91.76	68.13	48.66	102.73	154.27
CO2 Trans&Storage	0.00	0.00	0.00	0.00	0.00	0.00	4.26	4.26	0.00	0.00	0.00	0.00	0.00	0.00
FOM	6.22	6.22	2.43	2.43	7.35	7.35	9.18	9.18	12.18	12.18	14.28	10.20	19.68	19.33
Fuel	17.44	34.88	46.78	80.20	17.84	35.69	21.01	42.02	5.62	5.62	0.00	0.00	0.00	0.00
VOM	5.87	5.87	1.55	1.55	7.07	7.07	9.68	9.68	2.51	2.51	0.00	0.00	0.00	0.00
CO2 Cost @ \$10/tCO2	8.85	8.85	3.98	3.98	8.79	8.79	1.03	1.03	0.00	0.00	0.00	0.00	0.00	0.00
CO2 Cost @ \$40/tCO2	26.56	26.56	11.93	11.93	26.36	26.36	3.09	3.09	0.00	0.00	0.00	0.00	0.00	0.00
CO2 Cost @ \$100/tCO2	53.11	53.11	23.86	23.86	52.73	52.73	6.18	6.18	0.00	0.00	0.00	0.00	0.00	0.00
O&M	12.09	12.09	3.97	3.97	14.42	14.42	18.86	18.86	14.69	14.69	14.28	10.20	19.68	19.33
Total	66.25	83.69	65.56	98.98	86.10	103.94	110.42	131.43	73.02	112.07	82.41	58.87	122.40	173.60
Total @ \$10/tCO2	75.10	92.55	69.54	102.96	94.89	112.73	111.45	132.46	73.02	112.07	82.41	58.87	122.40	173.60
Total @ \$40/tCO2	101.66	119.10	81.47	114.89	121.25	139.09	114.54	135.55	73.02	112.07	82.41	58.87	122.40	173.60
Total @ \$100/tCO2	154.77	172.21	105.33	138.75	173.98	191.82	120.72	141.73	73.02	112.07	82.41	58.87	122.40	173.60