

## 9. Coal

The next three chapters cover the representation and underlying assumptions for fuels in EPA Base Case v.5.13. The current chapter focuses on coal, chapter 10 on natural gas, and chapter 11 on other fuels (fuel oil, biomass, nuclear fuel, and waste fuels) represented in the base case.

This chapter presents four main topics. The first is a description of how the coal market is represented in EPA Base Case v.5.13. This includes a discussion of coal supply and demand regions, coal quality characteristics, and the assignment of coals to power plants.

The next topic is the coal supply curves which were developed for EPA Base Case v.5.13 and the bottom-up, mine-based approach used to develop curves that would depict the coal choices and associated prices that power plants will face over the modeling time horizon. Included are discussions of the methods and data used to quantify the economically recoverable coal reserves, characterize their cost, and build the 67 coal supply curves that are implemented in EPA Base Case v.5.13. Illustrative examples are included of the step-by-step approach employed in developing the supply curves.

The third topic is coal transportation. It includes a description of the transport network, the methodology used to assign costs to the links in the network, and a discussion of the geographic, infrastructure, and regulatory considerations that come into play in developing specific rail, barge and truck transport rates. The last topic covered in this chapter is coal exports, imports, and non-electric sector demand.

The assumptions for the coal supply curves and coal transportation were finalized in June 2013, and were developed through a collaborative process with EPA supported by the following team of coal experts (with key areas of responsibility noted in parenthesis): TetraTech (coal transportation and team coordination), Wood Mackenzie (coal supply curve development), Hellerworx (coal transportation and third party review), and ICF (representation in IPM). The coal supply curves and transportation matrix implemented in EPA Base Case v.5.13 are included in tables and attachments at the end of this chapter.

### 9.1 Coal Market Representation in EPA Base Case v.5.13

Coal supply, coal demand, coal quality, and the assignment of specific types of coals to individual coal fired generating units are the four key components of the endogenous coal market modeling framework in EPA Base Case v.5.13. The modeling representation attempts to realistically reflect the actual options available to each existing coal fired power plant while aggregating data sufficiently to keep the model size and solution time within acceptable bounds.

Each coal-fired power plant modeled is reflected as its own coal demand region. The demand regions are defined to reflect the coal transportation options (rail, barge, truck, conveyer belt) that are available to the plant. These demand regions are interconnected by a transportation network to at least one of the 36 geographically dispersed coal supply regions. The model's supply-demand region links reflect actual on-the-ground transportation configurations. Every coal supply region can produce and each coal demand region can demand at least one grade of coal. Based on historical and engineering data (as described in Section 9.1.5 below), each coal fired unit is also assigned several coal grades which it may use if that coal type is available within its demand region.

In EPA Base Case v.5.13 the endogenous demand for coal is generated by coal fired power plants interacting with a set of exogenous supply curves (see Table 9-24 for coal supply curve data) for each coal grade in each supply region. The curves show the supply of coal (by coal supply region and coal grade) that is available to meet the demand at a given price. The supply of and demand for each grade of coal is linked to and affected by the supply of and demand for every other coal grade across supply and demand regions. The transportation network or matrix (see

Excerpt from Table 9-23 for coal transportation matrix data) also factors into the final determination of delivered coal prices, given coal demand and supply. IPM derives the equilibrium coal consumption and

prices that result when the entire electric system is operating, emission, and other requirements are met and total electric system costs over the modeling time horizon are minimized.

### 9.1.1 Coal Supply Regions

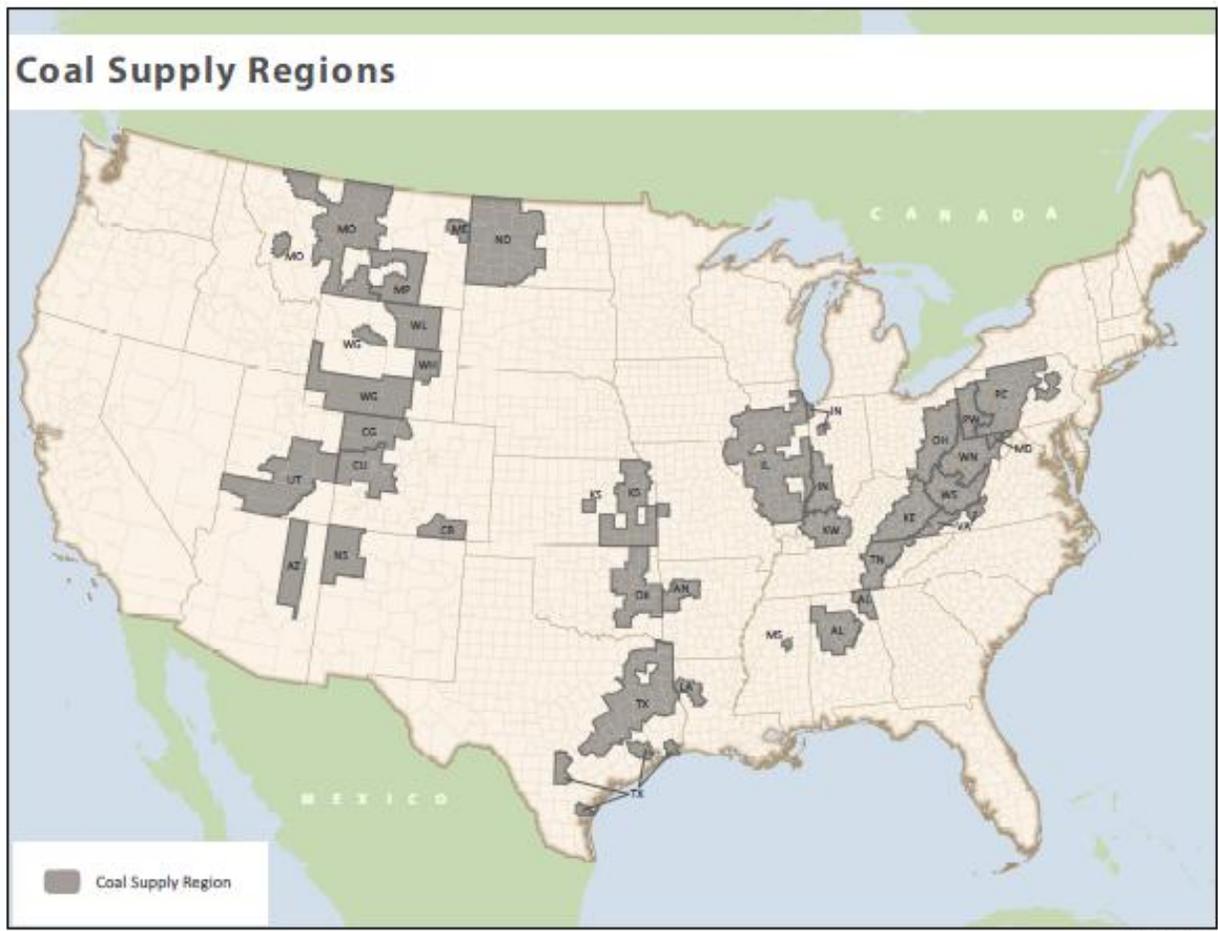
There are 36 coal supply regions in EPA Base Case v.5.13, each representing geographic aggregations of coal-mining areas that supply one or more coal grades. Coal supply regions may differ from one another in the types and quality of coal they can supply. Table 9-1 lists the coal supply regions included in EPA Base Case v.5.13.

Figure 9-1 provides a map showing the location of both the coal supply regions listed in Table 9-1 and the broader supply basins commonly used when referring to U.S. coal reserves.

**Table 9-1 Coal Supply Regions in EPA Base Case**

| Region               | State                       | Supply Region |
|----------------------|-----------------------------|---------------|
| Central Appalachia   | Kentucky, East              | KE            |
| Central Appalachia   | Tennessee                   | TN            |
| Central Appalachia   | Virginia                    | VA            |
| Central Appalachia   | West Virginia, South        | WS            |
| Dakota Lignite       | Montana, East               | ME            |
| Dakota Lignite       | North Dakota                | ND            |
| East Interior        | Illinois                    | IL            |
| East Interior        | Indiana                     | IN            |
| East Interior        | Kentucky, West              | KW            |
| Gulf Lignite         | Mississippi                 | MS            |
| Gulf Lignite         | Louisiana                   | LA            |
| Gulf Lignite         | Texas                       | TX            |
| Northern Appalachia  | Maryland                    | MD            |
| Northern Appalachia  | Ohio                        | OH            |
| Northern Appalachia  | Pennsylvania, Central       | PC            |
| Northern Appalachia  | Pennsylvania, West          | PW            |
| Northern Appalachia  | West Virginia, North        | WN            |
| Rocky Mountains      | Colorado, Green River       | CG            |
| Rocky Mountains      | Colorado, Raton             | CR            |
| Rocky Mountains      | Colorado, Uinta             | CU            |
| Rocky Mountains      | Utah                        | UT            |
| Southern Appalachia  | Alabama                     | AL            |
| Southwest            | Arizona                     | AZ            |
| Southwest            | New Mexico, San Juan        | NS            |
| West Interior        | Arkansas, North             | AN            |
| West Interior        | Kansas                      | KS            |
| West Interior        | Missouri                    | MO            |
| West Interior        | Oklahoma                    | OK            |
| Western Montana      | Montana, Bull Mountains     | MT            |
| Western Montana      | Montana, Powder River       | MP            |
| Western Wyoming      | Wyoming, Green River        | WG            |
| Wyoming Northern PRB | Wyoming, Powder River Basin | WH            |
| Wyoming Southern PRB | Wyoming, Powder River Basin | WL            |
| Alberta              | Alberta, Canada             | AB            |
| British Columbia     | British Columbia, Canada    | BC            |
| Saskatchewan         | Saskatchewan, Canada        | SK            |

Figure 9-1 Map of the Coal Supply Regions in EPA Base Case v.5.13



### 9.1.2 Coal Demand Regions

Coal demand regions are designed to reflect coal transportation options available to power plants. Each existing coal plant is reflected as its own individual demand region. The transportation infrastructure (i.e., rail, barge, or truck/conveyor belt), proximity to mine (i.e., mine mouth or not mine mouth), and transportation competitiveness levels (i.e., non-competitive, low-cost competitive, or high-cost competitive) are developed specific to each coal plant (demand region).

When IPM is run, it determines the amount and type of new generation capacity to add within each of IPM's 64 US model regions. These model regions reflect the administrative, operational, and transmission geographic structure of the electricity grid. Since these new plants could be located at various locations within the region, a generic transportation cost for different coal types is developed for these new plants and the methodology for deriving that cost is described in the transportation section of this chapter. See Table 9-2 for the list of coal plant demand regions reflected in the transportation matrix.

**Table 9-2 Coal Demand Regions in EPA Base Case**

| Plant ORIS Code | Plant Name                              | Coal Demand Region Codes | IPM Model Region for Which the Existing Demand Region Serves as the Surrogate* |
|-----------------|---|--------------------------|--|
| 1004            | Edwardsport                             | C181                     |  |
| 1010            | Wabash River                            | C183                     |  |
| 10684           | Argus Cogen Plant                       | C563                     |  |
| 1077            | Sutherland                              | C194                     |  |
| 1554            | Herbert A Wagner                        | C227                     |  |
| 1606            | Mount Tom                               | C232                     |  |
| 1943            | Hoot Lake                               | C259                     |  |
| 2682            | S A Carlson                             | C303                     |  |
| 2943            | Shelby Municipal Light Plant            | C339                     |  |
| 3319            | Jefferies                               | C365                     |  |
| 511             | Trinidad                                | C131                     |  |
| 54407           | Waupun Correctional Central Heating Plt | C624                     |  |
| 55856           | Prairie State Generatng Station         | C637                     | MIS_IL   |
| 56564           | John W Turk Jr Power Plant              | C644                     | SPP_WEST   |
| 56785           | Virginia Tech Power Plant               | C651                     |  |
| 56808           | Virginia City Hybrid Energy Center      | C653                     |  |
| 7               | Gadsden                                 | C101                     |  |
| 7242            | Polk                                    | C495                     |  |
| 728             | Yates                                   | C151                     |  |
| 991             | Eagle Valley                            | C176                     |  |
| 10              | Greene County                           | C103                     |  |
| 10003           | Colorado Energy Nations Company         | C514                     |  |
| 1001            | Cayuga                                  | C180                     |  |
| 10043           | Logan Generating Company LP             | C517                     |  |
| 10071           | Portsmouth Genco LLC                    | C518                     |  |
| 10075           | Taconite Harbor Energy Center           | C519                     |  |
| 1008            | R Gallagher                             | C182                     |  |
| 10113           | John B Rich Memorial Power Station      | C520                     |  |
| 1012            | F B Culley                              | C184                     |  |
| 10143           | Colver Power Project                    | C521                     |  |
| 10148           | White Pine Electric Power               | C522                     |  |
| 10151           | Grant Town Power Plant                  | C523                     |  |
| 1024            | Crawfordsville                          | C185                     |  |
| 1032            | Logansport                              | C186                     |  |
| 10328           | T B Simon Power Plant                   | C528                     |  |
| 10333           | Central Power & Lime                    | C529                     |  |
| 10343           | Foster Wheeler Mt Carmel Cogen          | C530                     |  |
| 1037            | Peru                                    | C187                     |  |
| 10377           | James River Genco LLC                   | C540                     |  |
| 10378           | CPI USA NC Southport                    | C541                     |  |
| 10380           | Elizabethtown Power LLC                 | C542                     |  |
| 10382           | Lumberton                               | C543                     |  |
| 10384           | Edgecombe Genco LLC                     | C544                     |  |
| 1040            | Whitewater Valley                       | C188                     |  |
| 1043            | Frank E Ratts                           | C189                     |  |
| 10464           | Black River Generation                  | C546                     |  |
| 1047            | Lansing                                 | C191                     |  |
| 1048            | Milton L Kapp                           | C192                     |  |
| 10495           | Rumford Cogeneration                    | C548                     | NENG_ME  |
| 10566           | Chambers Cogeneration LP                | C550                     |  |
| 10603           | Ebensburg Power                         | C552                     |  |
| 10640           | Stockton Cogen                          | C554                     | WEC_CALN   |
| 10641           | Cambria Cogen                           | C555                     |  |
| 10670           | AES Deepwater                           | C556                     |  |

| Plant ORIS Code | Plant Name                               | Coal Demand Region Codes | IPM Model Region for Which the Existing Demand Region Serves as the Surrogate* |
|-----------------|--|--------------------------|--|
| 10671           | AES Shady Point LLC                      | C557                     |  |
| 10672           | Cedar Bay Generating Company LP          | C558                     |  |
| 10675           | AES Thames                               | C560                     | NENG_CT  |
| 10676           | AES Beaver Valley Partners Beaver Valley | C561                     |  |
| 10678           | AES Warrior Run Cogeneration Facility    | C562                     |  |
| 1073            | Prairie Creek                            | C193                     |  |
| 10743           | Morgantown Energy Facility               | C564                     |  |
| 10768           | Rio Bravo Jasmin                         | C565                     |  |
| 10769           | Rio Bravo Poso                           | C566                     |  |
| 10784           | Colstrip Energy LP                       | C570                     |  |
| 108             | Holcomb                                  | C113                     |  |
| 1081            | Riverside                                | C195                     |  |
| 1082            | Walter Scott Jr Energy Center            | C196                     | MIS_MIDA   |
| 10849           | Silver Bay Power                         | C572                     |  |
| 1091            | George Neal North                        | C197                     |  |
| 1104            | Burlington                               | C198                     |  |
| 1122            | Ames Electric Services Power Plant       | C199                     |  |
| 113             | Cholla                                   | C114                     |  |
| 1131            | Streeter Station                         | C200                     |  |
| 1167            | Muscatine Plant #1                       | C201                     |  |
| 1217            | Earl F Wisdom                            | C203                     |  |
| 1218            | Fair Station                             | C204                     |  |
| 1241            | La Cygne                                 | C206                     |  |
| 1250            | Lawrence Energy Center                   | C207                     |  |
| 1252            | Tecumseh Energy Center                   | C208                     |  |
| 126             | H Wilson Sundt Generating Station        | C115                     |  |
| 127             | Oklauion                                 | C116                     | ERC_WEST   |
| 1295            | Quindaro                                 | C209                     |  |
| 130             | Cross                                    | C117                     |  |
| 1355            | E W Brown                                | C211                     |  |
| 1356            | Ghent                                    | C212                     |  |
| 136             | Seminole                                 | C118                     |  |
| 1364            | Mill Creek                               | C216                     |  |
| 1374            | Elmer Smith                              | C217                     | S_C_KY   |
| 1378            | Paradise                                 | C218                     | S_C_TVA  |
| 1379            | Shawnee                                  | C219                     |  |
| 1381            | Kenneth C Coleman                        | C220                     |  |
| 1382            | HMP&L Station Two Henderson              | C221                     |  |
| 1383            | Robert A Reid                            | C222                     |  |
| 1384            | Cooper                                   | C223                     |  |
| 1385            | Dale                                     | C224                     |  |
| 1393            | R S Nelson                               | C225                     | S_D_WOTA   |
| 1552            | C P Crane                                | C226                     |  |
| 1571            | Chalk Point LLC                          | C229                     |  |
| 1572            | Dickerson                                | C230                     | PJM_SMAC   |
| 1573            | Morgantown Generating Plant              | C231                     |  |
| 160             | Apache Station                           | C119                     |  |
| 1619            | Brayton Point                            | C234                     |  |
| 165             | GRDA                                     | C120                     |  |
| 1695            | B C Cobb                                 | C236                     |  |
| 1702            | Dan E Karn                               | C237                     |  |
| 1710            | J H Campbell                             | C238                     |  |
| 1720            | J C Weadock                              | C239                     |  |
| 1723            | J R Whiting                              | C240                     |  |
| 1731            | Harbor Beach                             | C241                     |  |

| Plant ORIS Code | Plant Name                     | Coal Demand Region Codes | IPM Model Region for Which the Existing Demand Region Serves as the Surrogate* |
|-----------------|--------------------------------|--------------------------|--|
| 1733            | Monroe                         | C243                     | MIS_LMI  |
| 1740            | River Rouge                    | C244                     |  |
| 1743            | St Clair                       | C245                     |  |
| 1745            | Trenton Channel                | C246                     |  |
| 1769            | Presque Isle                   | C247                     |  |
| 1771            | Escanaba                       | C248                     |  |
| 1825            | J B Sims                       | C249                     |  |
| 1830            | James De Young                 | C250                     |  |
| 1831            | Eckert Station                 | C251                     |  |
| 1832            | Erickson Station               | C252                     |  |
| 1843            | Shiras                         | C253                     |  |
| 1866            | Wyandotte                      | C254                     |  |
| 1891            | Syl Laskin                     | C255                     |  |
| 1893            | Clay Boswell                   | C256                     |  |
| 1915            | Allen S King                   | C258                     |  |
| 1961            | Austin Northeast               | C260                     |  |
| 1979            | Hibbing                        | C261                     |  |
| 2008            | Silver Lake                    | C262                     |  |
| 2018            | Virginia                       | C263                     |  |
| 2022            | Willmar                        | C264                     |  |
| 2049            | Jack Watson                    | C265                     |  |
| 207             | St Johns River Power Park      | C121                     |  |
| 2076            | Asbury                         | C267                     |  |
| 2079            | Hawthorn                       | C268                     |  |
| 2080            | Montrose                       | C269                     |  |
| 2094            | Sibley                         | C270                     |  |
| 2098            | Lake Road                      | C271                     |  |
| 2103            | Labadie                        | C272                     | MIS_MO   |
| 2104            | Meramec                        | C273                     |  |
| 2107            | Sioux                          | C274                     |  |
| 2123            | Columbia                       | C275                     |  |
| 2132            | Blue Valley                    | C276                     |  |
| 2144            | Marshall                       | C277                     |  |
| 2161            | James River Power Station      | C278                     |  |
| 2167            | New Madrid                     | C279                     |  |
| 2168            | Thomas Hill                    | C280                     |  |
| 2171            | Missouri City                  | C282                     |  |
| 2187            | J E Corette Plant              | C283                     |  |
| 2240            | Lon Wright                     | C284                     |  |
| 2277            | Sheldon                        | C285                     |  |
| 2291            | North Omaha                    | C286                     |  |
| 2324            | Reid Gardner                   | C287                     | WECC_SNV   |
| 2364            | Merrimack                      | C288                     | NENGREST   |
| 2367            | Schiller                       | C289                     |  |
| 2378            | B L England                    | C290                     | PJM_EMAC   |
| 2403            | PSEG Hudson Generating Station | C292                     |  |
| 2408            | PSEG Mercer Generating Station | C293                     |  |
| 2442            | Four Corners                   | C295                     |  |
| 2451            | San Juan                       | C296                     |  |
| 2526            | AES Westover                   | C298                     |  |
| 2527            | AES Greenidge LLC              | C299                     |  |
| 2535            | AES Cayuga                     | C300                     | NY_Z_C&E   |
| 2549            | C R Huntley Generating Station | C301                     |  |
| 2554            | Dunkirk Generating Plant       | C302                     |  |
| 26              | E C Gaston                     | C104                     |  |

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|-----------------|---------------------------------------|--------------------------|--|
| 2706            | Asheville                             | C304                     |  |
| 2712            | Roxboro                               | C306                     |  |
| 2718            | G G Allen                             | C309                     | S_VACA   |
| 2721            | Cliffside                             | C311                     |  |
| 2727            | Marshall                              | C312                     |  |
| 2790            | R M Heskett                           | C314                     |  |
| 2817            | Leland Olds                           | C315                     | MAP_WAUE   |
| 2823            | Milton R Young                        | C316                     |  |
| 2824            | Stanton                               | C317                     | MIS_MNWI   |
| 2828            | Cardinal                              | C318                     |  |
| 2836            | Avon Lake                             | C322                     |  |
| 2840            | Conesville                            | C325                     |  |
| 2850            | J M Stuart                            | C328                     |  |
| 2866            | FirstEnergy W H Sammis                | C331                     |  |
| 2876            | Kyger Creek                           | C333                     |  |
| 2878            | FirstEnergy Bay Shore                 | C334                     |  |
| 2914            | Dover                                 | C335                     |  |
| 2917            | Hamilton                              | C336                     |  |
| 2935            | Orrville                              | C337                     |  |
| 2936            | Painesville                           | C338                     |  |
| 2952            | Muskogee                              | C340                     |  |
| 2963            | Northeastern                          | C341                     |  |
| 298             | Limestone                             | C122                     |  |
| 3               | Barry                                 | C100                     |  |
| 3118            | Conemaugh                             | C345                     | PJM_PENE   |
| 3122            | Homer City Station                    | C346                     |  |
| 3130            | Seward                                | C347                     |  |
| 3136            | Keystone                              | C349                     |  |
| 3138            | New Castle Plant                      | C350                     |  |
| 3140            | PPL Brunner Island                    | C351                     | PJM_WMAC   |
| 3149            | PPL Montour                           | C352                     |  |
| 3152            | Sunbury Generation LP                 | C353                     |  |
| 3179            | Hatfields Ferry Power Station         | C355                     |  |
| 3181            | FirstEnergy Mitchell Power Station    | C356                     |  |
| 3287            | McMeekin                              | C360                     |  |
| 3295            | Urquhart                              | C361                     |  |
| 3297            | Wateree                               | C362                     |  |
| 3298            | Williams                              | C363                     |  |
| 3393            | Allen Steam Plant                     | C367                     |  |
| 3396            | Bull Run                              | C368                     |  |
| 3399            | Cumberland                            | C369                     |  |
| 3403            | Gallatin                              | C370                     |  |
| 3407            | Kingston                              | C373                     |  |
| 3470            | W A Parish                            | C375                     |  |
| 3497            | Big Brown Power Company LLC           | C376                     |  |
| 3775            | Clinch River                          | C378                     |  |
| 3796            | Bremo Bluff                           | C381                     |  |
| 3797            | Chesterfield                          | C382                     |  |
| 3809            | Yorktown                              | C384                     |  |
| 384             | Joliet 29                             | C123                     |  |
| 3845            | Transalta Centralia Generation        | C385                     | WECC_PNW   |
| 3935            | John E Amos                           | C386                     |  |
| 3943            | FirstEnergy Fort Martin Power Station | C390                     |  |
| 3944            | FirstEnergy Harrison Power Station    | C391                     |  |
| 3948            | Mitchell                              | C395                     |  |

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|-----------------|-------------------------------------|--------------------------|--|
| 3954            | Mt Storm                            | C396                     |  |
| 3992            | Blount Street                       | C397                     |  |
| 4041            | South Oak Creek                     | C398                     |  |
| 4042            | Valley                              | C399                     |  |
| 4050            | Edgewater                           | C400                     |  |
| 4072            | Pulliam                             | C402                     |  |
| 4078            | Weston                              | C403                     |  |
| 4125            | Manitowoc                           | C404                     |  |
| 4127            | Menasha                             | C405                     |  |
| 4140            | Alma                                | C406                     |  |
| 4143            | Genoa                               | C407                     |  |
| 4158            | Dave Johnston                       | C410                     |  |
| 4162            | Naughton                            | C411                     |  |
| 4259            | Endicott Station                    | C412                     |  |
| 4271            | John P Madgett                      | C413                     |  |
| 465             | Arapahoe                            | C125                     |  |
| 469             | Cherokee                            | C126                     |  |
| 47              | Colbert                             | C105                     |  |
| 470             | Comanche                            | C127                     | WECC_CO  |
| 477             | Valmont                             | C128                     |  |
| 492             | Martin Drake                        | C129                     |  |
| 4941            | Navajo                              | C414                     |  |
| 50              | Widows Creek                        | C106                     |  |
| 50039           | Kline Township Cogen Facility       | C580                     |  |
| 50130           | G F Weaton Power Station            | C581                     |  |
| 50366           | University of Notre Dame            | C588                     |  |
| 50388           | Phillips 66 Carbon Plant            | C590                     | WECC_SF  |
| 50397           | P H Glatfelter                      | C592                     |  |
| 50410           | Chester Operations                  | C594                     |  |
| 50611           | WPS Westwood Generation LLC         | C597                     |  |
| 50776           | Panther Creek Energy Facility       | C599                     |  |
| 508             | Lamar Plant                         | C130                     |  |
| 50806           | Stone Container Florence Mill       | C601                     |  |
| 50835           | TES Filer City Station              | C602                     |  |
| 50879           | Wheelabrator Frackville Energy      | C603                     |  |
| 50888           | Northampton Generating Company LP   | C604                     |  |
| 50931           | Yellowstone Energy LP               | C606                     |  |
| 50951           | Sunnyside Cogen Associates          | C607                     |  |
| 50974           | Scrubgrass Generating Company LP    | C609                     |  |
| 50976           | Indiantown Cogeneration LP          | C610                     |  |
| 51              | Dolet Hills                         | C107                     |  |
| 52007           | Mecklenburg Power Station           | C611                     |  |
| 52071           | Sandow Station                      | C612                     |  |
| 525             | Hayden                              | C132                     |  |
| 527             | Nucla                               | C133                     |  |
| 54035           | Roanoke Valley Energy Facility I    | C614                     |  |
| 54081           | Spruance Genco LLC                  | C615                     |  |
| 54144           | Piney Creek Project                 | C616                     |  |
| 54304           | Birchwood Power                     | C621                     |  |
| 54408           | UW Madison Charter Street Plant     | C625                     |  |
| 54556           | Corn Products Illinois              | C626                     |  |
| 54634           | St Nicholas Cogen Project           | C627                     |  |
| 54677           | CII Carbon LLC                      | C628                     |  |
| 54755           | Roanoke Valley Energy Facility II   | C629                     |  |
| 54775           | University of Iowa Main Power Plant | C630                     |  |

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|-----------------|---------------------------------------|--------------------------|--|
| 55076           | Red Hills Generating Facility         | C633                     |  |
| 55479           | Wygen 1                               | C635                     |  |
| 55749           | Hardin Generator Project              | C636                     |  |
| 56              | Charles R Lowman                      | C108                     |  |
| 56068           | Elm Road Generating Station           | C639                     | MIS_WUMS   |
| 56163           | KUCC                                  | C640                     |  |
| 56224           | TS Power Plant                        | C641                     | WECC_NNV   |
| 56319           | Wygen 2                               | C642                     |  |
| 564             | Stanton Energy Center                 | C134                     | FRCC   |
| 56456           | Plum Point Energy Station             | C643                     | S_D_N_AR   |
| 56596           | Wygen III                             | C645                     | WECC_WY  |
| 56609           | Dry Fork Station                      | C646                     |  |
| 56611           | Sandy Creek Energy Station            | C647                     |  |
| 56671           | Longview Power LLC                    | C649                     | PJM_AP   |
| 56708           | CFB Power Plant                       | C650                     |  |
| 56786           | Spiritwood Station                    | C652                     | MIS_MAPP   |
| 568             | Bridgeport Station                    | C135                     |  |
| 56848           | Haverhill North Cogeneration Facility | C210                     |  |
| 57046           | Archer Daniels Midland Columbus       | C654                     |  |
| 59              | Platte                                | C109                     | SPP_NEBR   |
| 593             | Edge Moor                             | C136                     |  |
| 594             | Indian River Generating Station       | C137                     |  |
| 60              | Whelan Energy Center                  | C110                     |  |
| 6002            | James H Miller Jr                     | C415                     |  |
| 6004            | FirstEnergy Pleasants Power Station   | C416                     |  |
| 6009            | White Bluff                           | C417                     | S_D_REST   |
| 6016            | Duck Creek                            | C418                     |  |
| 6017            | Newton                                | C419                     |  |
| 6018            | East Bend                             | C420                     |  |
| 6019            | W H Zimmer                            | C421                     |  |
| 602             | Brandon Shores                        | C138                     |  |
| 6021            | Craig                                 | C422                     |  |
| 6030            | Coal Creek                            | C423                     |  |
| 6031            | Killen Station                        | C424                     |  |
| 6034            | Belle River                           | C425                     |  |
| 6041            | H L Spurlock                          | C426                     |  |
| 6052            | Wansley                               | C427                     |  |
| 6055            | Big Cajun 2                           | C428                     |  |
| 6061            | R D Morrow                            | C429                     |  |
| 6064            | Nearman Creek                         | C430                     |  |
| 6065            | Iatan                                 | C431                     | SPP_N  |
| 6068            | Jeffrey Energy Center                 | C432                     |  |
| 6071            | Trimble County                        | C433                     |  |
| 6073            | Victor J Daniel Jr                    | C434                     |  |
| 6076            | Colstrip                              | C435                     | WECC_MT  |
| 6077            | Gerald Gentleman                      | C436                     |  |
| 6082            | AES Somerset LLC                      | C437                     | NY_Z_A&B   |
| 6085            | R M Schahfer                          | C438                     |  |
| 6089            | Lewis & Clark                         | C439                     |  |
| 6090            | Sherburne County                      | C440                     |  |
| 6094            | FirstEnergy Bruce Mansfield           | C441                     |  |
| 6095            | Sooner                                | C442                     |  |
| 6096            | Nebraska City                         | C443                     |  |
| 6098            | Big Stone                             | C444                     |  |
| 6101            | Wyodak                                | C445                     |  |

| Plant ORIS Code | Plant Name                   | Coal Demand Region Codes | IPM Model Region for Which the Existing Demand Region Serves as the Surrogate* |
|-----------------|------------------------------|--------------------------|--|
| 6106            | Boardman                     | C446                     |  |
| 6113            | Gibson                       | C447                     | MIS_INKY   |
| 6124            | McIntosh                     | C448                     |  |
| 6136            | Gibbons Creek                | C449                     |  |
| 6137            | A B Brown                    | C450                     |  |
| 6138            | Flint Creek                  | C451                     |  |
| 6139            | Welsh                        | C452                     |  |
| 6146            | Martin Lake                  | C453                     |  |
| 6147            | Monticello                   | C454                     |  |
| 6155            | Rush Island                  | C455                     |  |
| 6165            | Hunter                       | C456                     | WECC_UT  |
| 6166            | Rockport                     | C457                     |  |
| 6170            | Pleasant Prairie             | C458                     |  |
| 6177            | Coronado                     | C459                     |  |
| 6178            | Coletto Creek                | C460                     |  |
| 6179            | Fayette Power Project        | C461                     | ERC_REST   |
| 6180            | Oak Grove                    | C462                     |  |
| 6181            | J T Deely                    | C463                     |  |
| 6183            | San Miguel                   | C464                     |  |
| 6190            | Brame Energy Center          | C465                     | SPP_SE   |
| 6193            | Harrington                   | C466                     |  |
| 6194            | Tolk                         | C467                     | SPP_SPS  |
| 6195            | Southwest Power Station      | C468                     |  |
| 6204            | Laramie River Station        | C469                     |  |
| 6213            | Merom                        | C470                     |  |
| 6225            | Jasper 2                     | C471                     |  |
| 6248            | Pawnee                       | C473                     |  |
| 6249            | Winyah                       | C474                     |  |
| 6250            | Mayo                         | C475                     |  |
| 6254            | Ottumwa                      | C476                     | MIS_IA   |
| 6257            | Scherer                      | C477                     |  |
| 6264            | Mountaineer                  | C478                     |  |
| 628             | Crystal River                | C139                     |  |
| 641             | Crist                        | C140                     |  |
| 642             | Scholz                       | C141                     |  |
| 643             | Lansing Smith                | C142                     |  |
| 645             | Big Bend                     | C143                     |  |
| 6469            | Antelope Valley              | C480                     |  |
| 6481            | Intermountain Power Project  | C481                     |  |
| 663             | Deerhaven Generating Station | C144                     |  |
| 6639            | R D Green                    | C482                     |  |
| 6641            | Independence                 | C483                     |  |
| 6648            | Sandow No 4                  | C484                     |  |
| 6664            | Louisa                       | C485                     |  |
| 667             | Northside Generating Station | C145                     |  |
| 6705            | Warrick                      | C486                     |  |
| 676             | C D McIntosh Jr              | C146                     |  |
| 6761            | Rawhide                      | C487                     |  |
| 6768            | Sikeston Power Station       | C488                     |  |
| 6772            | Hugo                         | C489                     |  |
| 6823            | D B Wilson                   | C490                     |  |
| 703             | Bowen                        | C147                     | S_SOU  |
| 7030            | Twin Oaks Power One          | C491                     |  |
| 708             | Hammond                      | C148                     |  |
| 709             | Harlee Branch                | C149                     |  |

| Plant ORIS Code | Plant Name                                | Coal Demand Region Codes | IPM Model Region for Which the Existing Demand Region Serves as the Surrogate* |
|-----------------|---|--------------------------|--|
| 7097            | J K Spruce                                | C492                     |  |
| 7210            | Cope                                      | C493                     |  |
| 7213            | Clover                                    | C494                     | PJM_Dom  |
| 727             | Mitchell                                  | C150                     |  |
| 733             | Kraft                                     | C152                     |  |
| 7343            | George Neal South                         | C496                     |  |
| 7504            | Neil Simpson II                           | C497                     |  |
| 753             | Crisp Plant                               | C153                     |  |
| 7549            | Milwaukee County                          | C499                     |  |
| 7737            | Cogen South                               | C501                     |  |
| 7790            | Bonanza                                   | C502                     |  |
| 7902            | Pirkey                                    | C503                     |  |
| 8               | Gorgas                                    | C102                     |  |
| 8023            | Columbia                                  | C504                     |  |
| 8042            | Belews Creek                              | C505                     |  |
| 8066            | Jim Bridger                               | C672                     |  |
| 8069            | Huntington                                | C506                     |  |
| 8102            | General James M Gavin                     | C507                     |  |
| 8219            | Ray D Nixon                               | C508                     |  |
| 8222            | Coyote                                    | C509                     |  |
| 8223            | Springerville                             | C510                     | WECC_AZ  |
| 8224            | North Valmy                               | C511                     |  |
| 8226            | Cheswick Power Plant                      | C512                     |  |
| 856             | E D Edwards                               | C154                     |  |
| 861             | Coffeen                                   | C155                     |  |
| 87              | Escalante                                 | C112                     | WECC_NM  |
| 874             | Joliet 9                                  | C158                     |  |
| 876             | Kincaid Generation LLC                    | C159                     |  |
| 879             | Powerton                                  | C160                     |  |
| 883             | Waukegan                                  | C161                     |  |
| 884             | Will County                               | C162                     | PJM_COMD   |
| 887             | Joppa Steam                               | C164                     |  |
| 889             | Baldwin Energy Complex                    | C165                     |  |
| 891             | Havana                                    | C166                     |  |
| 892             | Hennepin Power Station                    | C167                     |  |
| 898             | Wood River                                | C169                     |  |
| 963             | Dallman                                   | C170                     |  |
| 976             | Marion                                    | C171                     |  |
| 983             | Clifty Creek                              | C173                     |  |
| 990             | Harding Street                            | C175                     |  |
| 994             | AES Petersburg                            | C177                     |  |
| 995             | Bailly                                    | C178                     |  |
| 997             | Michigan City                             | C179                     |  |
| 83551           | Plant Ratcliffe - the Kemper IGCC Project | C633                     |  |
| 55360           | Two Elk Generating Station                | C634                     |  |
| 56664           | Greene Energy Resource Recovery Project   | C678                     |  |
| 70194           | Genesee #3                                | C661                     |  |
| 70195           | Genesee                                   | C661                     |  |
| 70243           | HR Milner                                 | C662                     |  |
| 70269           | Keephills                                 | C663                     | CN_AB  |
| 70309           | Lingan                                    | C664                     |  |
| 70035           | Belledune                                 | C658                     | CN_NB  |
| 70441           | Poplar River                              | C665                     |  |
| 70449           | Pt. Aconi                                 | C666                     | CN_NS  |
| 70450           | Pt. Tupper                                | C667                     |  |

| Plant ORIS Code | Plant Name                    | Coal Demand Region Codes | IPM Model Region for Which the Existing Demand Region Serves as the Surrogate* |
|-----------------|-------------------------------|--------------------------|--|
| 70514           | Shand                         | C668                     | CN_SK  |
| 70517           | Sheerness                     | C669                     |  |
| 70056           | Boundary Dam                  | C659                     |  |
| 70562           | Sundance                      | C670                     |  |
| 70587           | Trenton NS                    | C671                     |  |
| 3264            | W S Lee                       | C358                     |  |
| 3406            | Johnsonville                  | C372                     |  |
| 3803            | Chesapeake                    | C383                     |  |
|                 |                               | C676                     |  |
| 2480            | Danskammer Generating Station | C297                     |  |
|                 |                               | C675                     |  |
| 2837            | FirstEnergy Eastlake          | C323                     |  |
|                 |                               | C677                     |  |
| 10002           | ACE Cogeneration Facility     | C513                     | NY_Z_F   |
| 70058           | Brandon G.S.                  | C660                     | NY_Z_G-I   |
| 1353            | Big Sandy                     | C210                     | NY_Z_D   |
|                 |                               |                          | PJM_ATSI   |
|                 |                               |                          | S_D_AMSO   |
|                 |                               |                          | WECC_SCE   |
|                 |                               |                          | CN_MB  |
|                 |                               |                          | PJM_West   |

\*If IPM elects to build a new coal plant, that coal plant will be assigned to a particular IPM region. Therefore, the base case modeling relies on a particular existing plant in that region – generally one considered to be representative of average transportation cost for plants in that region – and uses that plant’s transportation cost as a surrogate for coal transportation cost for a projected new coal plant.

### 9.1.3 Coal Quality Characteristics

Coal varies by heat content, SO<sub>2</sub> content, HCl content, and mercury content among other characteristics. To capture differences in the sulfur and heat content of coal, a two letter “coal grade” nomenclature is used. The first letter indicates the “coal rank” (bituminous, subbituminous, or lignite) with their associated heat content ranges (as shown in Table 9-3). The second letter indicates their “sulfur grade,” i.e., the SO<sub>2</sub> ranges associated with a given type of coal. (The sulfur grades and associated SO<sub>2</sub> ranges are shown in Table 9-4.).

**Table 9-3 Coal Rank Heat Content Ranges**

| Coal Type     | Heat Content (Btu/lb) | Classification |
|---------------|-----------------------|----------------|
| Bituminous    | >10,260 – 13,000      | B              |
| Subbituminous | > 7,500 – 10,260      | S              |
| Lignite       | less than 7,500       | L              |

**Table 9-4 Coal Grade SO<sub>2</sub> Content Ranges**

| SO <sub>2</sub> Grade | SO <sub>2</sub> Content Range (lbs/MMBtu) |
|-----------------------|---|
| A                     | 0.00 – 0.80                               |
| B                     | 0.81 – 1.20                               |
| D                     | 1.21 – 1.66                               |
| E                     | 1.67 – 3.34                               |
| G                     | 3.35 – 5.00                               |
| H                     | > 5.00                                    |

The assumptions in EPA Base Case v.5.13 on the heat, HCl, mercury, SO<sub>2</sub>, and ash content of coal are derived from EPA's "Information Collection Request for Electric Utility Steam Generating Unit Mercury Emissions Information Collection Effort" (ICR)<sup>82</sup>.

A two-year effort initiated in 1998 and completed in 2000, the ICR had three main components: (1) identifying all coal-fired units owned and operated by publicly-owned utility companies, Federal power agencies, rural electric cooperatives, and investor-owned utility generating companies, (2) obtaining "accurate information on the amount of mercury contained in the as-fired coal used by each electric utility steam generating unit... with a capacity greater than 25 megawatts electric, as well as accurate information on the total amount of coal burned by each such unit," and (3) obtaining data by coal sampling and stack testing at selected units to characterize mercury reductions from representative unit configurations. Data regarding the SO<sub>2</sub>, chlorine, and ash content of the coal used was obtained along with mercury content.

The 1998-2000 ICR resulted in more than 40,000 data points indicating the coal type, sulfur content, mercury content, ash content, chlorine content, and other characteristics of coal burned at coal-fired utility units greater than 25 MW.

#### 9.1.4 Emission Factors

To make this data usable in EPA Base Case v.5.13, the ICR data points were first grouped by IPM coal grades and IPM coal supply regions. Using the grouped ICR data, the average heat, SO<sub>2</sub>, mercury, HCl, and ash content were calculated for each coal grade/supply region combination. In instances where no data were available for a particular coal grade in a specific supply region, the national average SO<sub>2</sub> and mercury values for the coal grade were used as the region's values. The coal characteristics of Canadian coal supply regions are based on the coal characteristics of the adjacent US coal supply regions. The resulting values are shown in Table 9-5.

**Table 9-5 Coal Quality Characteristics by Supply Region and Coal Grade**

| Coal Supply Region | Coal Grade | Heat Content (MMBtu/Ton) | SO <sub>2</sub> Content (lbs/MMBtu) | Mercury Content (lbs/Tbtu) | Ash Content (lbs/MMBtu) | HCl Content (lbs/MMBtu) | CO <sub>2</sub> Content (lbs/MMBtu) |
|--------------------|------------|--------------------------|-------------------------------------|----------------------------|-------------------------|-------------------------|-------------------------------------|
| AB                 | SA         | 16.12                    | 0.59                                | 5.29                       | 5.47                    | 0.009                   | 214.9                               |
|                    | SB         | 15.60                    | 0.94                                | 6.06                       | 6.94                    | 0.013                   | 211.0                               |
|                    | SD         | 15.00                    | 1.43                                | 5.35                       | 11.60                   | 0.008                   | 214.9                               |
| AL                 | BB         | 25.50                    | 1.09                                | 4.18                       | 9.76                    | 0.012                   | 204.7                               |
|                    | BE         | 24.00                    | 2.68                                | 12.58                      | 10.70                   | 0.028                   | 204.7                               |
| AN                 | BG         | 22.00                    | 4.23                                | 9.36                       | 7.83                    | 0.079                   | 202.8                               |
| AZ                 | BB         | 21.50                    | 1.05                                | 5.27                       | 7.86                    | 0.067                   | 207.1                               |
| BC                 | BD         | 21.40                    | 1.40                                | 6.98                       | 8.34                    | 0.096                   | 205.4                               |
| CG                 | BB         | 22.74                    | 0.90                                | 4.09                       | 8.42                    | 0.021                   | 209.6                               |
|                    | SB         | 20.00                    | 0.93                                | 2.03                       | 7.06                    | 0.007                   | 209.6                               |
| CR                 | BB         | 23.36                    | 1.05                                | 5.27                       | 7.86                    | 0.067                   | 209.6                               |
| CU                 | BB         | 23.56                    | 0.86                                | 4.01                       | 7.83                    | 0.009                   | 209.6                               |
| IL                 | BE         | 23.75                    | 2.25                                | 6.52                       | 6.61                    | 0.214                   | 203.1                               |
|                    | BG         | 23.50                    | 4.56                                | 6.53                       | 8.09                    | 0.113                   | 203.1                               |
|                    | BH         | 22.00                    | 5.58                                | 5.43                       | 9.06                    | 0.103                   | 203.1                               |
| IN                 | BB         | 22.00                    | 1.00                                | 2.29                       | 6.67                    | 0.050                   | 203.1                               |
|                    | BE         | 22.70                    | 2.31                                | 5.21                       | 7.97                    | 0.036                   | 203.1                               |
|                    | BG         | 22.40                    | 4.27                                | 7.20                       | 8.22                    | 0.028                   | 203.1                               |
|                    | BH         | 22.40                    | 6.15                                | 7.11                       | 8.63                    | 0.019                   | 203.1                               |
| KE                 | BB         | 25.00                    | 1.04                                | 4.79                       | 6.41                    | 0.112                   | 206.4                               |

<sup>82</sup> Data from the ICR can be found at <http://www.epa.gov/ttn/atw/combust/utiltox/mercury.html>.

| Coal Supply Region | Coal Grade | Heat Content (MMBtu/Ton) | SO <sub>2</sub> Content (lbs/MMBtu) | Mercury Content (lbs/Tbtu) | Ash Content (lbs/MMBtu) | HCl Content (lbs/MMBtu) | CO <sub>2</sub> Content (lbs/MMBtu) |
|--------------------|------------|--------------------------|-------------------------------------|----------------------------|-------------------------|-------------------------|-------------------------------------|
|                    | BD         | 24.80                    | 1.44                                | 5.97                       | 7.45                    | 0.087                   | 206.4                               |
|                    | BE         | 24.64                    | 2.12                                | 7.93                       | 7.71                    | 0.076                   | 206.4                               |
| KS                 | BG         | 22.00                    | 4.84                                | 4.09                       | 8.47                    | 0.133                   | 202.8                               |
|                    | BD         | 23.80                    | 1.56                                | 5.56                       | 6.19                    | 0.280                   | 203.1                               |
| KW                 | BG         | 23.80                    | 4.46                                | 6.90                       | 8.01                    | 0.097                   | 203.1                               |
|                    | BH         | 23.00                    | 5.73                                | 8.16                       | 10.21                   | 0.053                   | 203.1                               |
| LA                 | LE         | 13.80                    | 2.49                                | 7.32                       | 17.15                   | 0.014                   | 212.6                               |
|                    | BD         | 23.00                    | 1.55                                | 7.82                       | 9.53                    | 0.029                   | 204.7                               |
| MD                 | BE         | 23.20                    | 2.78                                | 15.62                      | 11.70                   | 0.072                   | 204.7                               |
| ME                 | LE         | 12.97                    | 1.83                                | 11.33                      | 11.69                   | 0.019                   | 219.3                               |
| MO                 | BG         | 22.00                    | 4.54                                | 5.91                       | 9.46                    | 0.023                   | 202.8                               |
|                    | SA         | 18.20                    | 0.62                                | 4.24                       | 3.98                    | 0.007                   | 215.5                               |
| MP                 | SD         | 17.20                    | 1.49                                | 4.53                       | 10.13                   | 0.006                   | 215.5                               |
| MS                 | LE         | 10.39                    | 2.76                                | 12.44                      | 21.51                   | 0.018                   | 212.6                               |
| MT                 | BB         | 20.90                    | 1.05                                | 5.27                       | 7.86                    | 0.067                   | 215.5                               |
| ND                 | LE         | 13.10                    | 2.27                                | 8.30                       | 12.85                   | 0.014                   | 219.3                               |
|                    | SB         | 19.60                    | 0.89                                | 4.60                       | 14.51                   | 0.014                   | 209.2                               |
| NS                 | SE         | 18.40                    | 1.90                                | 8.65                       | 23.97                   | 0.008                   | 209.2                               |
|                    | BE         | 24.20                    | 3.08                                | 18.70                      | 7.08                    | 0.075                   | 204.7                               |
| OH                 | BG         | 24.10                    | 3.99                                | 18.54                      | 8.00                    | 0.071                   | 204.7                               |
|                    | BH         | 24.20                    | 6.43                                | 13.93                      | 9.13                    | 0.058                   | 204.7                               |
| OK                 | BG         | 22.00                    | 4.65                                | 26.07                      | 13.54                   | 0.051                   | 202.8                               |
|                    | BE         | 24.41                    | 2.57                                | 17.95                      | 9.23                    | 0.096                   | 204.7                               |
| PC                 | BG         | 24.40                    | 3.79                                | 21.54                      | 9.59                    | 0.092                   | 204.7                               |
|                    | BE         | 26.00                    | 2.51                                | 8.40                       | 5.37                    | 0.090                   | 204.7                               |
| PW                 | BG         | 25.40                    | 3.69                                | 8.56                       | 6.48                    | 0.059                   | 204.7                               |
|                    | LD         | 13.82                    | 1.51                                | 7.53                       | 11.57                   | 0.014                   | 219.3                               |
| SK                 | LE         | 10.58                    | 2.76                                | 12.44                      | 21.51                   | 0.018                   | 215.3                               |
|                    | BB         | 26.20                    | 1.14                                | 3.78                       | 10.35                   | 0.083                   | 206.4                               |
| TN                 | BE         | 25.23                    | 2.13                                | 8.43                       | 6.47                    | 0.043                   | 206.4                               |
|                    | LE         | 13.47                    | 3.00                                | 14.65                      | 25.65                   | 0.020                   | 212.6                               |
| TX                 | LG         | 12.47                    | 3.91                                | 14.88                      | 25.51                   | 0.036                   | 212.6                               |
|                    | LH         | 10.68                    | 5.67                                | 30.23                      | 23.95                   | 0.011                   | 212.6                               |
|                    | BA         | 23.00                    | 0.67                                | 4.37                       | 7.39                    | 0.015                   | 209.6                               |
| UT                 | BE         | 23.90                    | 2.34                                | 9.20                       | 7.41                    | 0.095                   | 209.6                               |
|                    | BB         | 25.90                    | 1.05                                | 4.61                       | 6.97                    | 0.054                   | 206.4                               |
| VA                 | BD         | 25.20                    | 1.44                                | 5.67                       | 7.97                    | 0.028                   | 206.4                               |
|                    | BE         | 25.00                    | 2.09                                | 8.40                       | 8.05                    | 0.028                   | 206.4                               |
|                    | BB         | 22.00                    | 1.13                                | 1.82                       | 5.58                    | 0.005                   | 214.3                               |
| WG                 | SD         | 18.80                    | 1.33                                | 4.33                       | 10.02                   | 0.008                   | 214.3                               |
| WH                 | SA         | 17.60                    | 0.58                                | 5.61                       | 5.47                    | 0.010                   | 214.3                               |
| WL                 | SB         | 16.79                    | 0.94                                | 6.44                       | 6.50                    | 0.012                   | 214.3                               |
|                    | BE         | 25.35                    | 2.55                                | 10.28                      | 7.89                    | 0.092                   | 204.7                               |
| WN                 | BH         | 25.15                    | 6.09                                | 8.82                       | 9.62                    | 0.045                   | 204.7                               |
|                    | BB         | 24.40                    | 1.09                                | 5.75                       | 9.15                    | 0.091                   | 206.4                               |
| WS                 | BD         | 24.50                    | 1.32                                | 8.09                       | 9.25                    | 0.098                   | 206.4                               |
|                    | BE         | 23.83                    | 1.94                                | 8.80                       | 9.89                    | 0.102                   | 206.4                               |

### 9.1.5 Coal Grade Assignments

The grades of coal that may be used by specific generating units were determined by an expert assessment of the ranks of coal that a unit had used in the past, the removal efficiency of the installed FGD, and the SO<sub>2</sub> permit rate of the unit. Examples of the coal grade assignments made for individual plants in EPA Base Case v.5.13 are shown in Table 9-6. Not all of the coal grades allowed to a plant by the coal grade assignment are necessarily available in the plant's assigned coal demand region (due to transportation limitations). IPM endogenously selects the coal burned by a plant by taking into account both the constraint of the plant's coal grade assignment and the constraint of the coals actually available within a plant's coal demand region.

**Table 9-6 Example of Coal Assignments Made in EPA Base Case**

| Plant Name            | Unique ID   | SIP SO <sub>2</sub> Limit (lbs/MMBtu) | Scrubber? | Fuels Allowed                          |
|-----------------------|-------------|---------------------------------------|-----------|--|
| Mt Storm              | 3954_B_3    | 0.15                                  | Yes       | BA, BB, BD                             |
| Mitchell              | 3948_B_1    | 1.2                                   | Yes       | BA, BB, BD, BE, BG, BH                 |
| Scherer               | 6257_B_1    | 1.2                                   | Yes       | BA, BB, BD, BE, BG, BH, SA, SB, SD, SE |
| Newton                | 6017_B_1    | 0.5                                   | No        | BA, SA                                 |
| Weston                | 4078_B_4    | 0.1                                   | Yes       | BA, SA, SB                             |
| Sandow No 4           | 6648_B_4    | 1.2                                   | Yes       | LA, LD, LE, LG, LH                     |
| Monticello            | 6147_B_3    | 1.2                                   | Yes       | LA, LD, LE, LG, LH, SA, SB, SD, SE     |
| Laramie River Station | 6204_B_3    | 0.2                                   | Yes       | LA, SA, SB                             |
| Big Cajun 2           | 6055_B_2B1  | 0.38                                  | No        | SA                                     |
| W A Parish            | 3470_B_WAP8 | 0.36                                  | Yes       | SA, SB, SD, SE                         |

## 9.2 Coal Supply Curves

### 9.2.1 Nature of Supply Curves Developed for EPA Base Case v.5.13

In keeping with IPM's data-driven bottom-up modeling framework, a bottom-up approach (relying heavily on detailed economic and resource geology data and assessments) was used to prepare the coal supply curves for EPA Base Case v.5.13. Wood Mackenzie was chosen to develop the curves based on their extensive experience in preparing mine-by-mine estimates of cash operating costs for operating mines in the U.S., their access to both public and proprietary data sources, and their active updating of the data both through research and interviews.

In order to establish consistent nomenclature, Wood Mackenzie first mapped its internal list of coal regions and qualities to EPA's 36 coal supply regions (described above in sections 0) and 14 coal grades (described above in section 9.1.3). The combined code list is shown in Table 9-7 below with the IPM supply regions appearing in the rows and the coal grades in the columns. Wood Mackenzie then created supply curves for each region and coal-grade combination (indicated by the "x" in Table 9-7) for forecast years 2016, 2018, 2020, 2025, 2030, 2040, and 2050.

**Table 9-7 Basin-Level Groupings Used in Preparing v.5.13 Coal Supply Curves**

| Table 9-7 Basin Level Groupings Used in Preparing v.5.13 Coal Supply Curves |            |                                |            |    |    |    |    |    |         |    |    |    |               |    |    |    |   |
|---|------------|--------------------------------|------------|----|----|----|----|----|---------|----|----|----|---------------|----|----|----|---|
| Coal Supply Region  | Geo Region | Geo. Sub-Region                | Bituminous |    |    |    |    |    | Lignite |    |    |    | Subbituminous |    |    |    |   |
|   |            |                                | BA         | BB | BD | BE | BG | BH | LD      | LE | LG | LH | SA            | SB | SD | SE |   |
| AB  | Canada     | Alberta, Canada                |            |    |    |    |    |    |         |    |    |    |               | X  | X  | X  |   |
| AK  | West       | Northwest                      | X          |    |    |    |    |    |         |    |    |    |               | X  |    |    |   |
| AL  | Appalachia | Southern Appalachia            |            | X  |    | X  |    |    |         |    |    |    |               |    |    |    |   |
| AN  | Interior   | West Interior                  |            |    |    |    | X  |    |         |    |    |    |               |    |    |    |   |
| AZ  | West       | Southwest                      |            | X  |    |    |    |    |         |    |    |    |               |    |    |    |   |
| BC  | Canada     | British Columbia               |            |    | X  |    |    |    |         |    |    |    |               |    |    |    |   |
| CG  | West       | Rocky Mountain                 |            | X  |    |    |    |    |         |    |    |    |               |    | X  |    |   |
| CR  | West       | Rocky Mountain                 |            | X  |    |    |    |    |         |    |    |    |               |    |    |    |   |
| CU  | West       | Rocky Mountain                 |            | X  |    |    |    |    |         |    |    |    |               |    |    |    |   |
| IL  | Interior   | East Interior (Illinois Basin) |            |    |    | X  | X  | X  |         |    |    |    |               |    |    |    |   |
| IN  | Interior   | East Interior (Illinois Basin) |            | X  |    | X  | X  | X  |         |    |    |    |               |    |    |    |   |
| KE  | Appalachia | Central Appalachia             |            | X  | X  | X  |    |    |         |    |    |    |               |    |    |    |   |
| KS  | Interior   | West Interior                  |            |    |    |    | X  |    |         |    |    |    |               |    |    |    |   |
| KW  | Interior   | East Interior (Illinois Basin) |            |    | X  |    | X  | X  |         |    |    |    |               |    |    |    |   |
| LA  | Interior   | Gulf Lignite                   |            |    |    |    |    |    |         | X  |    |    |               |    |    |    |   |
| MD  | Appalachia | Northern Appalachia            |            |    | X  | X  |    |    |         |    |    |    |               |    |    |    |   |
| ME  | West       | Dakota Lignite                 |            |    |    |    |    |    |         | X  |    |    |               |    |    |    |   |
| MO  | Interior   | West Interior                  |            |    |    |    | X  |    |         |    |    |    |               |    |    |    |   |
| MP  | West       | Powder River Basin             |            |    |    |    |    |    |         |    |    |    |               | X  |    | X  |   |
| MS  | Gulf       | Gulf Lignite Coast             |            |    |    |    |    |    |         | X  |    |    |               |    |    |    |   |
| MT  | West       | Western Montana                |            | X  |    |    |    |    |         |    |    |    |               |    |    |    |   |
| ND  | West       | Dakota Lignite                 |            |    |    |    |    |    |         | X  |    |    |               |    |    |    |   |
| NS  | West       | Southwest                      |            |    |    |    |    |    |         |    |    |    |               |    | X  |    | X |
| OH  | Appalachia | Northern Appalachia            |            |    |    | X  | X  | X  |         |    |    |    |               |    |    |    |   |
| OK  | West       | West Interior                  |            |    |    |    | X  |    |         |    |    |    |               |    |    |    |   |
| PC  | Appalachia | Northern Appalachia            |            |    |    | X  | X  |    |         |    |    |    |               |    |    |    |   |
| PW  | Appalachia | Northern Appalachia            |            |    |    | X  | X  |    |         |    |    |    |               |    |    |    |   |
| SK  | Canada     | Saskatchewan                   |            |    |    |    |    |    |         | X  | X  |    |               |    |    |    |   |
| TN  | Appalachia | Central Appalachia             |            | X  |    | X  |    |    |         |    |    |    |               |    |    |    |   |
| TX  | Interior   | Gulf Lignite                   |            |    |    |    |    |    |         | X  | X  | X  |               |    |    |    |   |
| UT  | West       | Rocky Mountain                 | X          |    |    | X  |    |    |         |    |    |    |               |    |    |    |   |
| VA  | Appalachia | Central Appalachia             |            | X  | X  | X  |    |    |         |    |    |    |               |    |    |    |   |
| WG  | West       | Western Wyoming                |            | X  |    |    |    |    |         |    |    |    |               |    |    | X  |   |
| WH  | West       | Powder River Basin             |            |    |    |    |    |    |         |    |    |    |               | X  |    |    |   |
| WL  | West       | Powder River Basin             |            |    |    |    |    |    |         |    |    |    |               |    | X  |    |   |
| WN  | Appalachia | Northern Appalachia            |            |    |    | X  |    | X  |         |    |    |    |               |    |    |    |   |
| WS  | Appalachia | Central Appalachia             |            | X  | X  | X  |    |    |         |    |    |    |               |    |    |    |   |

## 9.2.2 Cost Components in the Supply Curves

Costs are represented as total cash costs, which is a combination of a mine's operating cash costs plus royalty & levies. These costs are estimated on a Free on Board (FOB) basis at the point of sale. Capital costs (either expansionary or sustaining) are not included in the cash cost estimate. We believe that total cash cost is the best metric for the supply curves as coal prices tend to be ultimately determined by the incremental cost of production (i.e. total cash cost).

### Operating cash cost

These are the direct operating cash costs and includes, where appropriate, mining, coal preparation, product transport, and overheads. No capital cost component or depreciation & amortization charge is included. Operating cash costs consist of the following elements:

- Mining costs - Mining costs are the direct cost of mining coal and associated waste material for surface and underground operations. It includes any other mine site costs, such as ongoing rehabilitation / reclamation, security, community development costs. It also includes the cost of transporting raw coal from the mining location to the raw coal stockpile at the coal preparation plant.
- Coal preparation - The cost of coal preparation includes raw coal stockpile reclaim, crushing and screening, washing and marketable coal product stockpiling (if applicable).
- Transport - This covers all transport costs of product coal to point of sale. Transport routes with multiple modes (e.g. truck and rail) are shown as total cost per marketable ton for all stages of the transport route. Loading charges are included in this cost if relevant.
- Overheads - This is any off mine site general and administration overheads that are essential to the production and sale of a mine's coal product. Examples would be essential corporate management or a sales and marketing charge.

It is important to note that although the formula for calculating mine costs is consistent across regions, some tax rates and fees vary by state and mine type. In general, there are two mine types: underground (deep) or surface mines. Underground mining is categorized as being either a longwall (LW) or a continuous room-and-pillar mine (CM). Geologic conditions and characteristics of the coal seams determine which method will be used. Surface mines are typically categorized by the type of mining equipment used in their operation such as draglines (DL), or truck & shovels (TS). These distinctions are important because the equipment used by the mine affects productivity measures and ultimately mine costs. Further information on operating cost methodology and assumptions can be found in Attachment 9-1.

### Royalties and Levies

These include, where appropriate, coal royalties, mine safety levies, health levies, industry research levies and other production taxes.

## 9.2.3 Procedures Employed in Determining Mining Costs

The total cash costs of mines have been estimated in current year terms using public domain information including; geological reports, reported statistics on production, labor and input costs, and company reports. The estimates have been validated by reference to information gained by visits to operations, and discussions with industry participants.

Because the estimates are based only on public information and analysis, and do not represent private knowledge of an operation's actual costs, there may be deviations from actual costs. In instances where confidential information is held by Wood Mackenzie, it has not been used to produce the published estimates. Several methods are employed for cost estimation depending on the availability of information and the diversity of mining operations. When possible, Wood Mackenzie analysts developed detailed lists

of mine related costs. Costs such as employee wages & benefits, diesel fuel, spare parts, roof bolts and explosives among a host of others are summed to form a mine's operating cash costs.

Where information is incomplete, cost items are grouped into categories that can be compared with industry averages by mine type and location. These averages can be adjusted up or down based on new information or added assumptions. The adjustments take the form of cost multipliers or parameter values. Specific cost multipliers are developed with the aid of industry experts and proprietary formulas. This method is at times used to convert materials and supplies, on-site trucking costs and mine and division overhead categories into unit removal costs by equipment type. To check the accuracy of these cost estimates, cash flow analysis of publicly traded companies is used. Mine cash-costs are extracted from corporate cash flows and compared with the initial estimates. Adjustments for discrepancies are made on a case-by-case basis.

Many of the cost assumptions associated with labor and productivity were taken from the Mine Safety Health Administration (MSHA) database. All active mines report information specific to production levels, number of employees and employee hours worked. Wood Mackenzie supplements the basic MSHA data with information obtained from mine personnel interviews and industry contacts. Phone conversations and conferences with industry professionals provide additional non-reported information such as work schedules, equipment types, percentages of washed coal, and trucking distances from the mine to wash-plants and load-out terminals.

For each active or proposed mine, Wood Mackenzie reports the estimated cost to take coal from the mine to a logical point-of-sale. The logical point-of-sale may be a truck or railcar load-out or even a barge facility. This is done to produce a consistent cost comparison between mines. Any transport costs beyond the point-of-sale terminal are not part of this analysis and are not reflected in the supply curves themselves.

#### **9.2.4 Procedure Used In Determining Mine Productivity**

Projected production and stripping ratios are the key determinants of surface mine productivity. Wood Mackenzie assumes mining costs increase as stripping ratios increase. The stripping ratio is the quantity of overburden removed relative to the quantity of coal recovered. Assuming that reserves are developed where they are easiest to mine and deliver to market, general theory suggests that as the easy reserves are depleted, greater amounts of overburden must be handled for the same amount of coal production; thus causing a decrease in mining productivity. However, this productivity loss is often offset by technology improvements in labor saving equipment.

While an understanding of the forces affecting productivity is important, no attempt is made to develop a complex algorithm that tries to balance increased stripping ratios with added technology improvements. Instead, Wood Mackenzie uses reported aggregate productivity (in tons per employee hour) provided by MSHA as a starting point and divides the production by the productivity calculation to obtain aggregate employee-hours. Allocating aggregate employee hours among specific mines, production forecasts for these mines can be converted back into mine-specific productivity forecasts. These forecasts are then examined on a mine-by-mine basis by an industry expert with region-specific knowledge.

A similar approach is used for underground mines. First, as background, the specific factors affecting productivity at such mines are identified. For example, underground mines do not have stripping ratios. Productivity estimates for these mines largely depend on the type of mining technique used (which is a function of the region's geology). For instance, longwall-mines can produce a high volume of low cost coal but geologic constraints like small reserve blocks and the occurrence of faulting tends to limit this technique to certain regions. In addition to geologic constraints, there are many variables that can impact underground-mine productivity but they are often difficult to quantify and forecast.

## **9.2.5 Procedure to Determine Total Recoverable Reserves by Region and Type**

Before mine operators are allowed to mine coal, they must request various permits, conduct environmental impact studies (EIS) and, in many cases, notify corporate shareholders. In each of these instances, mine operators are asked to estimate annual production and total recoverable reserves. Wood Mackenzie uses the mine operators' statements as the starting point for production and reserves forecasts. If no other material is available, interviews with company personnel will provide an estimate.

Region and coal type determinations for unlisted reserves are based on public information reported for similarly located mines. Classifying reserves this way means considering not only a mine's geographic location but also its geologic conditions such as depth and type of overburden and the specific identity of the coal seam(s) being mined. For areas where public information is not available or is incomplete, Wood Mackenzie engineers and geologists estimate reserve amounts based on land surveys and reports of coal depth and seam thickness provided by the U.S. Geologic Service (USGS). This information is then used to extrapolate reserve estimates from known coal sources to unknown sources. Coal quality determinations for unknown reserves are assigned in much the same way.

Once a mine becomes active, actual production numbers reported in corporate SEC filings and MSHA reports are subtracted from the total reserve number to arrive at current reserve amounts. Wood Mackenzie consistently updates the reserves database when announcements of new or amended reserves are made public. As a final check, the Wood Mackenzie supply estimates are balanced against the Demonstrated Reserve Base (DRB)<sup>83</sup> estimates to ensure that they do not exceed the DRB estimates.

## **9.2.6 New Mine Assumptions**

New mines have been included based on information that Wood Mackenzie maintains on each supply region. They include announced projects, coal lease applications and unassigned reserves reported by mining companies. Where additional reserves are known to exist, additional incremental steps have been added and designated with the letter "N" in the "Step Name" field of the supply curves. These incremental steps were added based on characteristics of the specific region, typical mine size, and cost trends. They do not necessarily imply a specific mine or mine type.

In the IL basin, there is a significant amount of mine projects announced and/or underway that will be completed and available by 2016. These "on the way" mines are designated as existing mines in the "step name" field as they already are, or expected to be, available by the first model run year of 2016. Wood Mackenzie has also identified technical coal reserves that may be commercial in the longer-term, but would most likely not be developed until after the completion of mine development already underway or announced. Therefore, the new mines reflecting these additional reserves are not available until 2018.

## **9.2.7 Other Notable Procedures**

### **Currency Assumptions**

For consistency with the cost basis used in EPA Base Case v.5.13, costs are converted to real 2011\$.

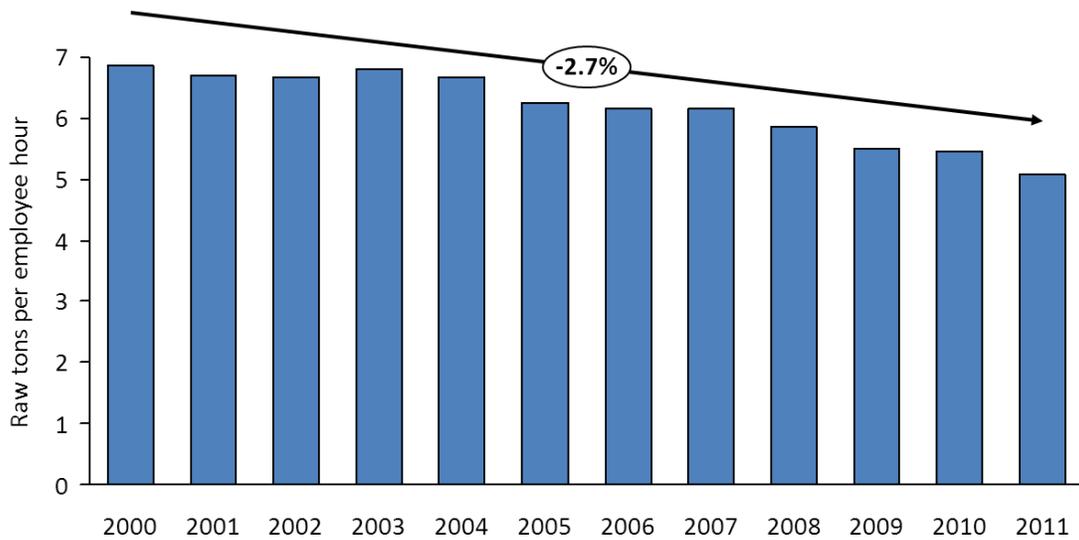
### **Future Cost Adjustments**

Changes in mine productivity are a key factor impacting the evolution of costs over time. In general, mine productivity is expected to continue to decline – in large part due to worsening geology and more difficult to mine reserves. Productivity has declined at -2.7% CAGR from 2000-2011 as shown in Figure 9-2.

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<sup>83</sup> Posted by the Energy Information Administration (EIA) in its Coal Production Report.

**Figure 9-2 Coal Mine Productivity (2000-2011)**



Source: U.S. Department of Labor, Mine Safety and Health Administration

**Figure 9-3 Average Annual Cost Growth Assumptions by Region (2012-2050)**

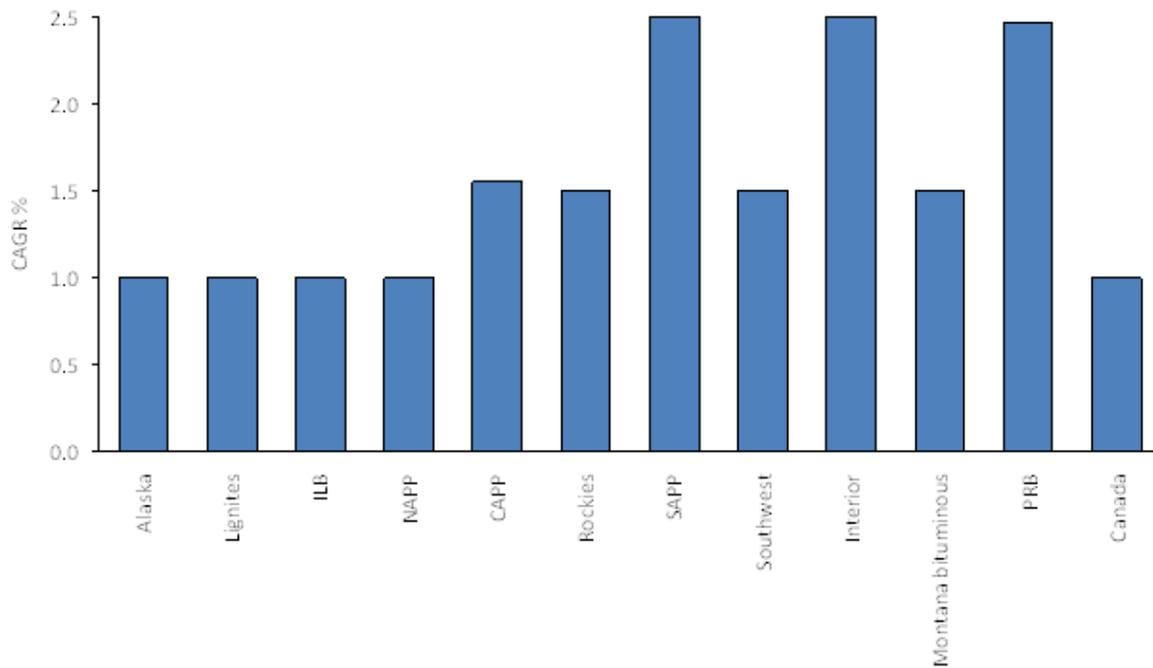


Figure 9-3 shows the compounded average annual growth rate (CAGR) of mining costs by basin over the forecast period. It should be noted that cost increases will ultimately be linked to market demand (as demand grows, the faster the rate of depletion of lower cost reserves). Costs in some supply basins are expected to increase more quickly than others due to issues such as mining conditions, productivity, infrastructure limitations, etc. Region-specific information can be found in section 9.2.9.

## Supply Growth Limitations

To the maximum extent possible, the IPM model is set up to determine the optimal volume of coal supply which can be profitably supplied. For two of the lower cost basins (Powder River and Illinois basins), maximum production capacities are included as constraints (production ceilings) to more accurately reflect the upper bound of what could be produced in a given year. Those limits, represented in millions of tons per year, are shown in Figure 9-4 below. These ceilings are necessary to guard against modeling excess annual production capacity in certain basins. For instance, in the PRB, several of the “new” mines reflect expansion mines that would not be developed until the initial mine is further depleted. In this case, the production ceiling helps safeguard against a modeling scenario that would simultaneously produce from both of these mines.

**Figure 9-4 Maximum Annual Coal Production Capacity**

Maximum Thermal Coal Production Capacity per Year (million tons)

|     | 2016  | 2018  | 2020  | 2025  | 2030  | 2040  | 2050  |
|-----|-------|-------|-------|-------|-------|-------|-------|
| ILB | 165.5 | 190   | 203.4 | 220.1 | 239.5 | 254.6 | 254.6 |
| PRB | 509   | 525.5 | 552.5 | 572.3 | 609.5 | 609.5 | 609.5 |

### 9.2.8 Supply Curve Development

The description below describes the development of the coal supply curves. The actual coal supply curves can be found [www.epa.gov/airmarkets/progsregs/epa-ipm/BaseCasev513.html](http://www.epa.gov/airmarkets/progsregs/epa-ipm/BaseCasev513.html). For illustrative purposes, there is also an excerpt of the coal supply curves in Table 9-24 of this chapter.

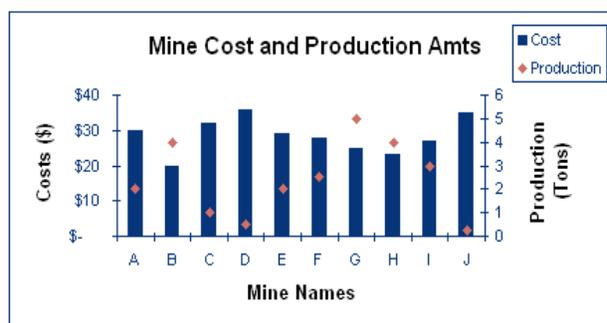
Once costs are estimated for all new or existing mines, they are sorted by cash cost, lowest to highest, and plotted cumulatively by production to form a supply curve. The supply curve then represents all mines – new or existing as well as both underground and surface mines– irrespective of market demand. Mines located toward the bottom of the curve have the lowest cost and are most likely to be developed while the mines at the top of the curve are higher cost and will likely wait to be developed. The process for developing a cumulative supply curve is illustrated in Figure 9-5 and Figure 9-6 below.

**Figure 9-5 Illustration of Preliminary Step in Developing a Cumulative Coal Supply Curve**

#### Key

E = EXISTING MINE  
 N = NEW MINE  
 U = UNDERGROUND MINE  
 S = SURFACE MINE

| New or Existing? | Mine | Type | Cost  | Production |
|------------------|------|------|-------|------------|
| N                | A    | S    | \$ 30 | 2          |
| E                | B    | U    | \$ 20 | 4          |
| N                | C    | S    | \$ 32 | 1          |
| N                | D    | S    | \$ 36 | 0.5        |
| E                | E    | S    | \$ 29 | 2          |
| N                | F    | S    | \$ 28 | 2.5        |
| E                | G    | U    | \$ 25 | 5          |
| E                | H    | U    | \$ 23 | 4          |
| E                | I    | U    | \$ 27 | 3          |
| N                | J    | S    | \$ 35 | 0.25       |

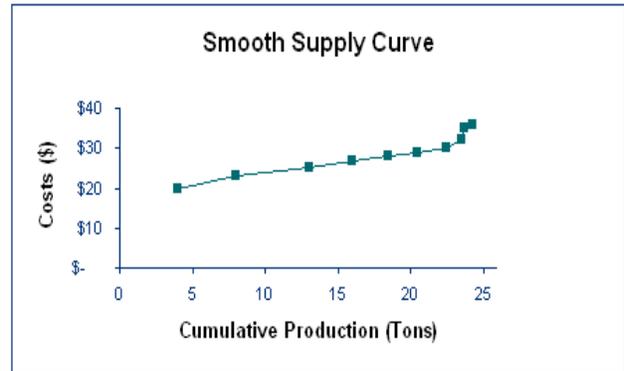


In the table and graph above, mine costs and production are sorted alphabetically by mine name. To develop a supply curve from the above table the values must be sorted by mine costs from lowest to highest. A new column for cumulative production is added, and then a supply curve graph is created which shows the costs on the ‘Y’ axis and the cumulative production on the ‘X’ axis. Notice below that the

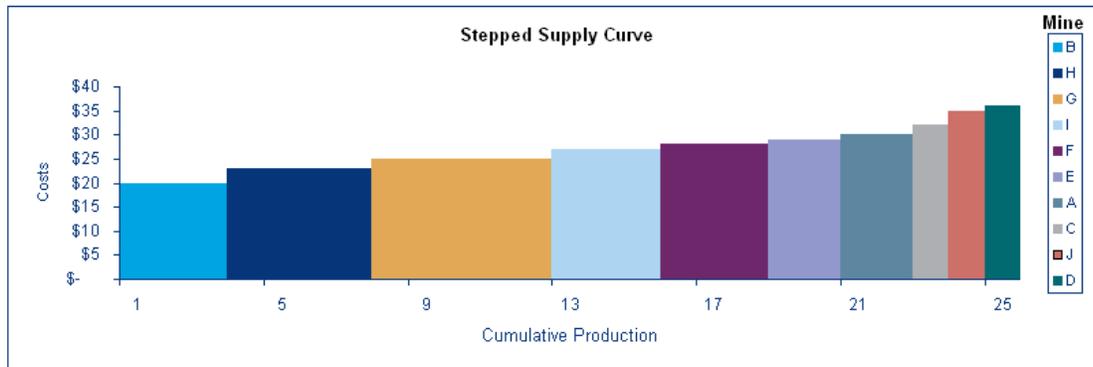
curve contains all mines – new or existing as well as both underground and surface mines. The resulting curve is a continuous supply curve but can be modified to show costs as a stepped supply curve. (Supply curves in stepped format are used in linear programming models like IPM.) See Figure 9-7 for a stepped version of the supply curve example shown in Figure 9-6. Here each step represents an individual mine, the width of the step reflects the mine's production, and its height shows the cost of production.

**Figure 9-6 Illustration of Final Step in Developing a Cumulative Coal Supply Curve**

| New or Existing? | Mine | Type | Cost  | Production | Cum Production |
|------------------|------|------|-------|------------|----------------|
| E                | B    | U    | \$ 20 | 4          | 4              |
| E                | H    | U    | \$ 23 | 4          | 8              |
| E                | G    | U    | \$ 25 | 5          | 13             |
| E                | I    | U    | \$ 27 | 3          | 16             |
| N                | F    | S    | \$ 28 | 2.5        | 18.5           |
| E                | E    | S    | \$ 29 | 2          | 20.5           |
| N                | A    | S    | \$ 30 | 2          | 22.5           |
| N                | C    | S    | \$ 32 | 1          | 23.5           |
| N                | J    | S    | \$ 35 | 0.25       | 23.75          |
| N                | D    | S    | \$ 36 | 0.5        | 24.25          |



**Figure 9-7 Example Coal Supply Curve in Stepped Format**



|                 |   | PRODUCTION AMOUNT |       |       |       |       |       |       |       |       |       |
|-----------------|---|-------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| MINE NAME       |   | B                 | H     | G     | I     | F     | E     | A     | C     | J     | D     |
| New or Existing |   | 4                 | 8     | 13    | 16    | 18.5  | 20.5  | 22.5  | 24    | 25    | 25.5  |
| 1               | E | \$ 20             | -     | -     | -     | -     | -     | -     | -     | -     | -     |
| 2               | E | \$ 20             | -     | -     | -     | -     | -     | -     | -     | -     | -     |
| 3               | E | \$ 20             | -     | -     | -     | -     | -     | -     | -     | -     | -     |
| 4               | E | -                 | \$ 23 | -     | -     | -     | -     | -     | -     | -     | -     |
| 5               | E | -                 | \$ 23 | -     | -     | -     | -     | -     | -     | -     | -     |
| 6               | E | -                 | \$ 23 | -     | -     | -     | -     | -     | -     | -     | -     |
| 7               | E | -                 | \$ 23 | -     | -     | -     | -     | -     | -     | -     | -     |
| 8               | E | -                 | -     | \$ 25 | -     | -     | -     | -     | -     | -     | -     |
| 9               | E | -                 | -     | \$ 25 | -     | -     | -     | -     | -     | -     | -     |
| 10              | E | -                 | -     | \$ 25 | -     | -     | -     | -     | -     | -     | -     |
| 11              | E | -                 | -     | \$ 25 | -     | -     | -     | -     | -     | -     | -     |
| 12              | E | -                 | -     | \$ 25 | -     | -     | -     | -     | -     | -     | -     |
| 13              | E | -                 | -     | -     | \$ 27 | -     | -     | -     | -     | -     | -     |
| 14              | E | -                 | -     | -     | \$ 27 | -     | -     | -     | -     | -     | -     |
| 15              | E | -                 | -     | -     | \$ 27 | -     | -     | -     | -     | -     | -     |
| 16              | N | -                 | -     | -     | -     | \$ 28 | -     | -     | -     | -     | -     |
| 17              | N | -                 | -     | -     | -     | \$ 28 | -     | -     | -     | -     | -     |
| 18              | N | -                 | -     | -     | -     | \$ 28 | -     | -     | -     | -     | -     |
| 19              | E | -                 | -     | -     | -     | -     | \$ 29 | -     | -     | -     | -     |
| 20              | N | -                 | -     | -     | -     | -     | \$ 29 | -     | -     | -     | -     |
| 21              | N | -                 | -     | -     | -     | -     | -     | \$ 30 | -     | -     | -     |
| 22              | N | -                 | -     | -     | -     | -     | -     | \$ 30 | -     | -     | -     |
| 23              | N | -                 | -     | -     | -     | -     | -     | -     | \$ 32 | -     | -     |
| 24              | N | -                 | -     | -     | -     | -     | -     | -     | -     | \$ 35 | -     |
| 25              | N | -                 | -     | -     | -     | -     | -     | -     | -     | -     | \$ 36 |

## **9.2.9 EPA Base Case v.5.13 Assumptions and Outlooks for Major Supply Basins**

### **Powder River Basin (PRB)**

The PRB is somewhat unique to other US coal basins; in that producers have the ability to add significant production volumes relatively easily and at a profit. That said, the decisions on production volumes are largely based on the market conditions, namely the price. For instance, in a low price environment producers tend to moderate production volumes to maintain attractive prices, and choose to ramp up production when prices are higher. The evolution of costs in the PRB will be strongly correlated to the rate at which producers ramp up production at existing mines, which as indicated will depend on market conditions.

Wood Mackenzie anticipates productivity at most existing PRB mining operations to decline at very modest rates over the forecast horizon, with increasing strip ratios at least partly offset by improved usage of labor and capital. As most PRB mines are progressing downward, the ratios of overburden to coal (strip ratios) will increase in the future. The productivity of new mines will be quite low during the early stages of their life span.

Mining at several locations is steadily proceeding production westward toward the Joint Line railroad and, at current and forecasted levels of production, around 2019 several mines are expected to eventually reach the line. This event will result in a costly movement across the railroad, requiring significant capital investment and reduced production as the transition is made. During the move across the Joint Line railroad, strip ratios will spike and productivity will fall as new box cuts are created.

### **Illinois Basin (ILB)**

Production costs in the Illinois basin have been steadily decreasing in recent years as new low cost mines are opened using more efficient longwall mining techniques. Wood Mackenzie expects that average costs will continue to decline as additional new mines are developed. However, as new low cost mines are brought on, higher cost mines will be unable to compete. In the long-term, the shape of the ILB supply curve is expected to decrease in cost and increase in production capacity.

Given its large scale growth potential, investments in rail infrastructure development will have to keep pace. While Wood Mackenzie expect there to be some bottlenecks in expanding transportation in the basin early on, they project that once utilities begin committing to taking ILB coal, railroads will make the necessary changes to accommodate the change. However, there is a risk that rail infrastructure in the basin will not be able to keep up with the rate of growth in ILB which could limit the region's otherwise strong growth potential.

### **Central Appalachia (CAPP)**

Geologic conditions in the CAPP region are challenging, with thin seams and few underground reserves amenable to more efficient longwall mining techniques. Costs of production in CAPP have risen substantially in recent years as the region has struggled with mining thinner seams as reserves deplete, mining accidents have led to increased inspections, and mine permitting has become increasingly difficult as opposition to surface mining intensifies – with the revocation of some section 404 permits that regulate the discharge into US waterways. Since surface mining is the lowest cost form of production in CAPP, reduced growth in surface mining operations is adding to increasing cost in the region

As producers cut back on production over the course of 2012 in order to manage the falling demand, productivity suffered and production costs per ton in the region rose roughly 10%. In an effort to retain margins, producers implemented a variety of tactics to try to keep production costs from continuing to increase; including, shifting more production to lower cost operations and selling lesser quality raw coal to save on coal preparation/washing costs.

## **Northern Appalachia (NAPP)**

Mining cost escalation in NAPP has slowed considerably recently. Future cost for the basin as a whole will depend largely on the development of new reserve areas.

Northern Appalachia has an estimated 5 billion short tons (Bst) of thermal coal reserves. However, only about 2.3 Bst is associated with currently operating mines and 90 Mst of that with existing mines that are idled. Many major producers within the region are within years of depleting currently assigned reserves.

### **9.3 Coal Transportation**

The description below describes the transportation matrix. The actual transportation matrix can be found [www.epa.gov/airmarkets/progsregs/epa-ipm/BaseCasev513.html](http://www.epa.gov/airmarkets/progsregs/epa-ipm/BaseCasev513.html). For illustrative purposes, there is also an excerpt of the transportation matrix in Excerpt from Table 9-23 of this chapter.

Within the United States, steam coal for use in coal-fired power plants is shipped via a variety of transportation modes, including barge, conveyor belt, rail, truck, and lake/ocean vessel. A given coal-fired plant typically only has access to a few of these transportation options and, in some cases, only has access to a single type. The number of transportation options that a plant has when soliciting coal deliveries influences transportation rate levels that plant owners are able to negotiate with transportation providers.

Within the Eastern United States, rail service is provided predominately by two major rail carriers in the region, Norfolk Southern (NS) and CSX Transportation (CSX). Within the Western United States, rail service is also provided predominately by two major rail carriers, Burlington Northern Santa Fe (BNSF) and Union Pacific (UP). Plants in the Midwestern United States may have access to rail service from BNSF, CSX, NS, UP, the Canadian National (CN), Canadian Pacific (CP), or short-line railroads. Barge, truck, and vessel service is provided by multiple firms, and conveyor service is only applicable to coal-fired plants directly located next to mining operations (e.g., mine-mouth plants).

In recent years, transportation rates for most modes of coal transportation have increased significantly due to significant increases in input costs (including fuel prices, steel prices and labor costs), as well as a number of Surface Transportation Board (STB) rail rate case decisions that have allowed higher rail rates to be charged at plants that are served only by a single railroad.

The transportation methodology and rates presented below reflect expected long-run equilibrium transportation rates as of March 2012, when the coal transportation rate assumptions for EPA Base Case v.5.13 were finalized. The forecasted changes in transportation rates during the 2016-2050 forecast period reflect expected changes in long-term equilibrium transportation rate levels, including the long-term market dynamics that will drive these pricing levels.

All rates are represented in 2011 real dollars.

#### **9.3.1 Coal Transportation Matrix Overview**

##### **Description**

In previous versions of EPA Base Case using IPM, the coal transportation matrix connected coal supply regions with coal demand regions that represented the aggregated coal demand from several coal-fired generating plants. In EPA Base Case v.5.13, the demand side of the coal transportation matrix has been expanded, so that each of the approximately 560 U.S. and Canadian coal-fired generating plants included in EPA Base Case v.5.13 is individually represented in the coal transportation matrix. This allows the coal transportation routings, coal transportation distances, and coal transportation rates associated with each individual coal-fired generating plant to be estimated more accurately in EPA Base Case v. 5.13.

The coal transportation matrix shows the total coal transportation rate which is expected to be required to transport coal from selected coal supply regions to each individual coal-fired generating plant.

The coal supply regions associated with each coal-fired generating plant in EPA Base Case v.5.13 are largely unchanged from previous versions of IPM. The coal supply regions associated with each coal-fired generating plant are the coal supply regions which were supplying each plant as of late 2011, have supplied each plant in previous years, or are considered economically and operationally feasible sources of additional coal supply during the forecast period in EPA Base Case v. 5.13 (2016-2050.) A more detailed discussion of the coal supply regions can be found in previous sections.

**Methodology**

Each coal supply region and coal-fired generating plant is connected via a transportation link, which can include multiple transportation modes. For each transportation link, cost estimates, in terms of \$/ton, were calculated utilizing mode-based transportation cost factors, analysis of the competitive nature of the moves, and overall distance that the coal type must move over each applicable mode. An example of the calculation methodology for movements including multiple transportation modes is shown in Figure 9-8.

**Figure 9-8 Calculation of Multi-Mode Transportation Costs (Example)**



**9.3.2 Calculation of Coal Transportation Distances**

**Definition of applicable supply/demand regions**

Coal-fired generating plants are linked to coal supply regions based on historical coal deliveries, as well as based on the potential for new coal supplies to serve each coal-fired generating plant going forward. A generating plant will almost always have transportation links with more than one supply region, depending on the various coal types that can be physically delivered and burned at that particular plant. On average, each coal-fired generating plant represented in IPM is linked with about nine coal supply regions. Some plants may have more than the average number of transportation links and some may have fewer, depending on the location of each plant, the transportation modes available to deliver coal to each plant, the boiler design and emissions control technologies associated with each plant, and other factors that affect the types of coal that can be burned at each plant.

For “mine-mouth” plants (plants for which the current coal supply is delivered from a single nearby mine, generally by conveyor belt or using truck transportation) that are 200 MW or larger, Hellerworx and Tetrtech have estimated the cost of constructing facilities that would allow rail delivery of alternative coal supplies, and the transportation rates associated with the delivery of alternative coal supplies. This includes the construction of rail spurs (between one and nine miles in length depending on the proximity of each plant to existing railroad lines) to connect each plant with existing railroad lines.

**Transportation Links for Existing Coal-Fired Plants**

Transportation routings from particular coal supply regions to particular coal-fired generating plants were developed based on third-party software<sup>84</sup> and other industry knowledge available to Hellerworx and Tetrtech. Origins for each coal supply region were based on significant mines or other significant

<sup>84</sup> Rail routing and mileage calculations utilize ALK Technologies PC\*Miller software.

delivery points within the supply region, and the destination points were plant-specific for each coal-fired generating plant represented in IPM. For routes utilizing multiple modes (e.g. rail-to-barge, truck-to-rail, etc.), distances were developed separately for each transportation mode.

### **Transportation Links for New Coal-Fired Plants**

Transportation links for new coal-fired plants that were under construction as of March 2012 were developed using the same methodology as for existing plants, and these committed new plants were included in IPM as of their expected date of commercial operation.

Coal transportation costs for new coal-fired plants not yet under construction (i.e., coal transportation costs for new coal plants modeled by IPM) were estimated by selecting an existing coal plant within each IPM Region whose coal supply alternatives, and coal transportation costs, were considered representative of the coal supply alternatives and coal transportation costs that would likely be faced by new coal plants within that same IPM Region. This methodology helps ensure that coal transportation costs for new coal plants are properly integrated with and assessed fairly vis-à-vis existing coal-fired assets within the IPM modeling structure.

### **9.3.3 Overview of Rail Rates**

Competition within the railroad industry is limited. Two major railroads in the Western U.S. (BNSF and UP) and two major railroads in the Eastern U.S. (CSX and NS) currently originate most of the U.S. coal traffic that moves by rail.

In recent years, railroads have increased coal transportation rates in real terms wherever they have the opportunity. However, rail rates at plants captive to a single rail carrier are now close to the maximum levels prescribed by the STB, which limits the potential for further real increases in these rates. Moreover, as of March 2012, the differential between rates at captive plants and rates at competitively-served plants was relatively narrow. The current relatively small differentials between captive and competitive rates are expected to persist over the long-term.

All of the rail rates discussed below include railcar costs, and include fuel surcharges at expected 2012 fuel price levels.

### **Overview of Rail Competition Definitions**

Within the transportation matrix, rail rates are classified as being either captive or competitive (see Table 9-8), depending on the ability of a given coal demand region to solicit supplies from multiple suppliers. Competitive rail rates are further subdivided into high- and low-cost competitive subcategories. Competition levels are affected both by the ability to take delivery of coal supplies from multiple rail carriers, the use of multiple rail carriers to deliver coal from a single source (e.g., BNSF/UP transfer to NS/CSX for PRB coal moving east), or the option to take delivery of coal via alternative transportation modes (e.g., barge, truck or vessel).

**Table 9-8 Rail Competition Definitions**

| <b>Competition Type</b> | <b>Definition</b>   |
|-------------------------|---|
| Captive                 | Demand source can only access coal supplies through a single provider; demand source has limited power when negotiating rates with railroads.   |
| High-Cost Competitive   | Demand source has some, albeit still limited, negotiating power with rail providers; definition typically applies to demand sources that have the option of taking delivery from either of the two major railroads in the region. |
| Low-Cost Competitive    | Demand source has a strong position when negotiating with railroads; typically, these demand sources also have the option of taking coal supplies via modes other than rail (e.g., barge, truck, or lake/ocean vessel).           |

## **Rail Rates**

As previously discussed, rail rates are subdivided into three competitive categories: captive, high-cost competitive, and low-cost competitive. Moves are further subdivided based on the distance that the coal supply must move over rail lines: <200 miles, 200-299 miles, 300-399 miles, 400-649 miles, and 650+ miles. Within the Western U.S., mileages are only subdivided into two categories (<300 miles and 300+ miles), given the longer distances that these coal supplies typically move.

Initial rate level assumptions were determined based on an analysis of recent rate movements, current rate levels in relation to maximum limits prescribed by the STB, expected coal demand, diesel prices, recent capital expenditures by railroads, and projected productivity improvements. In general, shorter moves result in higher applicable rail rates due to the lesser distance over which fixed costs can be spread. As previously discussed, rail rates reflect anticipated 2012 costs in 2011 real dollars.

### **Rates Applicable to Eastern Moves**

Rail movements within the Eastern U.S. are handled predominately by the region's two major carriers, NS and CSX. Some short movements are handled by a variety of short-line railroads. Most plants in the Eastern U.S. are served solely by a single railroad (i.e., they are captive plants). The practical effect of this is that CSX and NS do not compete aggressively at the limited number of plants that have access to both major railroads, and the rates for high-cost competitive plants tend to be similar to the rates for captive plants. Table 9-9 presents the 2012 eastern rail rates.

**Table 9-9 Assumed Eastern Rail Rates for 2012  
(2011 mills/ton-mile)**

| <b>Mileage Block</b> | <b>Captive</b> | <b>High-Cost Competitive</b> | <b>Low-Cost Competitive</b> |
|----------------------|----------------|------------------------------|-----------------------------|
| < 200                | 85             | 85                           | 72                          |
| 200-299              | 71             | 71                           | 60                          |
| 300-399              | 69             | 69                           | 59                          |
| 400-649              | 61             | 61                           | 52                          |
| 650+                 | 43             | 43                           | 37                          |

### **Rates Applicable to Midwestern Moves**

Plants in the Midwestern U. S. may be served by BNSF, CN, CP, CSX, NS, UP or short-line railroads. However, the rail network in the Midwestern U.S. is very complex, and most plants are served by only one of these railroads. The Midwestern U.S. also includes a higher proportion of barge-served and truck-served plants than is the case in the Eastern or Western U.S. Table 9-10 depicts 2012 rail rates in the Midwest.

**Table 9-10 Assumed Midwestern Rail Rates for 2012  
(2011 mills/ton-mile)**

| <b>Mileage Block</b> | <b>Captive</b> | <b>High-Cost Competitive</b> | <b>Low-Cost Competitive</b> |
|----------------------|----------------|------------------------------|-----------------------------|
| < 200                | 85             | 85                           | 72                          |
| 200-299              | 67             | 67                           | 57                          |
| 300-399              | 49             | 49                           | 42                          |
| 400-649              | 46             | 46                           | 39                          |
| 650+                 | 43             | 43                           | 37                          |

### **Rates Applicable to Western Moves**

Rail moves within the Western U.S. are handled predominately by BNSF and UP. Due to industry concerns about potential future regulation of carbon dioxide (CO<sub>2</sub>) emissions and other factors, it now

appears very unlikely that the CP will construct a third rail line into the PRB, so this analysis assumes the PRB will continue to be served only by BNSF and UP. Rates for Western coal shipments from the PRB are forecast separately from rates for Western coal shipments from regions other than the PRB. This reflects the fact that in many cases coal shipments from the PRB are subject to competition between BNSF and UP, while rail movements of Western coal from regions other than the PRB consist primarily of Colorado and Utah coal shipments that originate on UP, and New Mexico coal shipments that originate on BNSF. PRB coal shipments also typically involve longer trains moving over longer average distances than coal shipments from the other Western U.S. coal supply regions, which means these shipments typically have lower costs per ton-mile than non-PRB coal shipments. In the west, there are enough plants that have access to both BNSF and UP or a neutral carrier that the western railroads are concerned of losing coal volume to the competing railroad, and do offer more of a rate discount to plants that can access both railroads (e.g., high-cost competitive).

### **Non-PRB Coal Moves**

The assumed non-PRB western rail rates for 2012 are shown in Table 9-11.

**Table 9-11 Assumed Non-PRB Western Rail Rates for 2012  
(2011 mills/ton-mile)**

| <b>Mileage Block</b> | <b>Captive</b> | <b>High-Cost Competitive</b> | <b>Low-Cost Competitive</b> |
|----------------------|----------------|------------------------------|-----------------------------|
| < 300                | 53             | 45                           | 45                          |
| 300+                 | 28             | 25                           | 25                          |

The assumed PRB western rail rates for 2012 are available in Table 9-12.

### **PRB Moves Confined to BNSF/UP Rail Lines**

**Table 9-12 Assumed PRB Western Rail Rates for 2012  
(2011 mills/ton-mile)**

| <b>Mileage Block</b> | <b>Captive</b> | <b>High-Cost Competitive</b> | <b>Low-Cost Competitive</b> |
|----------------------|----------------|------------------------------|-----------------------------|
| < 300                | 32             | 27                           | 27                          |
| 300+                 | 26             | 23                           | 23                          |

### **PRB Moves Transferring to Eastern Railroads**

For PRB coal moving west-to-east, the coal transportation matrix assumes that the applicable low-cost competitive assumption is applied to the BNSF/UP portion of the rail mileage, and an assumption of either \$2.20 per ton or 41 mills per ton-mile (whichever is higher) is applied to the portion of the movement that occurs on railroads other than BNSF and UP. (The \$2.16 per ton assumption is a minimum rate for short-distance movements of PRB coal on Eastern railroads.)

#### **9.3.4 Truck Rates**

Truck rates include loading and transport components, and all trucking flows are considered competitive because highway access is open to any trucking firm. The truck rates shown in Table 9-13 are expected long-term equilibrium levels reflective of current rates as of March 2012, and expected changes in labor costs, fuel prices, and steel prices.

**Table 9-13 Assumed Truck Rates for 2012  
(2011 Real Dollars)**

| <b>Market</b> | <b>Loading Cost (\$/ton)</b> | <b>Transport (mills/ton-mile)</b> |
|---------------|------------------------------|-----------------------------------|
| All Markets   | 1.00                         | 120                               |

### 9.3.5 Barge and Lake Vessel Rates

As with truck rates, barge rates include loading and transport components, and all flows are considered competitive because river access is open to all barge firms. The transportation matrix subdivides barge moves into three categories, which are based on the direction of the movement (upstream vs. downstream) and the size of barges that can be utilized on a given river. As with the other types of transportation rates forecast in this analysis, the barge rate levels shown in Table 9-14 are expected long-term equilibrium levels reflective of current rates as of March 2012, and expected changes in labor costs, fuel prices, and steel prices.

**Table 9-14 Assumed Barge Rates for 2012  
(2011 Real Dollars)**

| Type of Barge Movement   | Loading Cost<br>(\$/ton) | Transport<br>(mills/ton-mile) |
|--|--------------------------|-------------------------------|
| Upper Mississippi River, and Downstream on the Ohio River System | 2.70                     | 9.7                           |
| Upstream on the Ohio River System                                | 2.45                     | 11.5                          |
| Lower Mississippi River  | 2.70                     | 6.9                           |

Notes:

1. The Upper Mississippi River is the portion of the Mississippi River north of St. Louis.
2. The Ohio River System includes the Ohio, Big Sandy, Kanawha, Allegheny, and Monongahela Rivers.
3. The Lower Mississippi River is the portion of the Mississippi River south of St. Louis.

Rates for transportation of coal by lake vessel on the Great Lakes were forecast on a plant-specific basis, taking into account the lake vessel distances applicable to each movement, the expected backhaul economics applicable to each movement (if any), and the expected changes in labor costs and fuel and steel prices over the long-term.

### 9.3.6 Transportation Rates for Imported Coal

Transportation rates for imported coal reflect expectations regarding the long-term equilibrium level for ocean vessel rates, taking into account expected long-run equilibrium levels for fuel and steel prices, and expected continued strong demand for shipment of dry bulk commodities (especially coal and iron ore) from China and other Asian nations.

In EPA Base Case v.5.13, it is assumed that imported coal is likely to be used only at plants that can receive this coal by direct water delivery (i.e., via ocean vessel or barge delivery to the plant). This is based on an assessment of recent transportation market dynamics, which suggests that railroads are unlikely to quote rail rates that will allow imported coal to be cost-competitive at rail-served plants. Moreover, import rates are higher for the Alabama and Florida plants than for New England plants because many of the Alabama and Florida plants are barge-served (which requires the coal to be transloaded from ocean vessel to barge at an ocean terminal, and then moved by barge to the plant), whereas most of the New England plants can take imported coal directly by vessel. The assumed costs are summarized in

Excerpt from Table 9-23.

### 9.3.7 Other Transportation Costs

In addition to the transportation rates already discussed, the transportation matrix assumes various other rates that are applied on a case-by-case basis, depending on the logistical nature of a move. These charges apply when coal must be moved between different transportation modes (e.g., rail-to-barge or truck-to-barge) – see Table 9-15.

**Table 9-15 Assumed Other Transportation Rates for 2012  
(2011 Real Dollars)**

| Type of Transportation               | Rate (\$/ton) |
|--------------------------------------|---------------|
| Rail-to-Barge Transfer               | 1.50          |
| Rail-to-Vessel Transfer              | 2.00          |
| Truck-to-Barge Transfer              | 2.00          |
| Rail Switching Charge for Short line | 2.00          |
| Conveyor                             | 1.00          |

### 9.3.8 Long-Term Escalation of Transportation Rates

#### Overview of Market Drivers

According to data published by the Association of American Railroads (AAR), labor costs accounted for about 33% of the rail industry's operating costs in 2010, and fuel accounted for an additional 18%. The remaining 49% of the rail industry's costs relate primarily to locomotive and railcar ownership and maintenance, and track construction and maintenance.

The RCAF<sup>85</sup> Unadjusted for Productivity (RCAF-U), which tracks operating expenses for the rail industry, increased at an annualized rate of 3.3%/year between the second quarter of 2008 and the fourth quarter of 2011, see Table 9-9, more than double the increase of 1.5%/year in general inflation (GDP-IPD) over the same period. This is largely the result of unusually steep increases in labor costs, which reflected the effect of new labor agreements negotiated prior to the economic downturn that occurred in late 2008 and 2009. Hellerworx expects that going forward, the rail industry's labor costs will increase at a more moderate rate (assumed to be 1% more than overall inflation), which is more in line with longer-term historical increases in these costs.

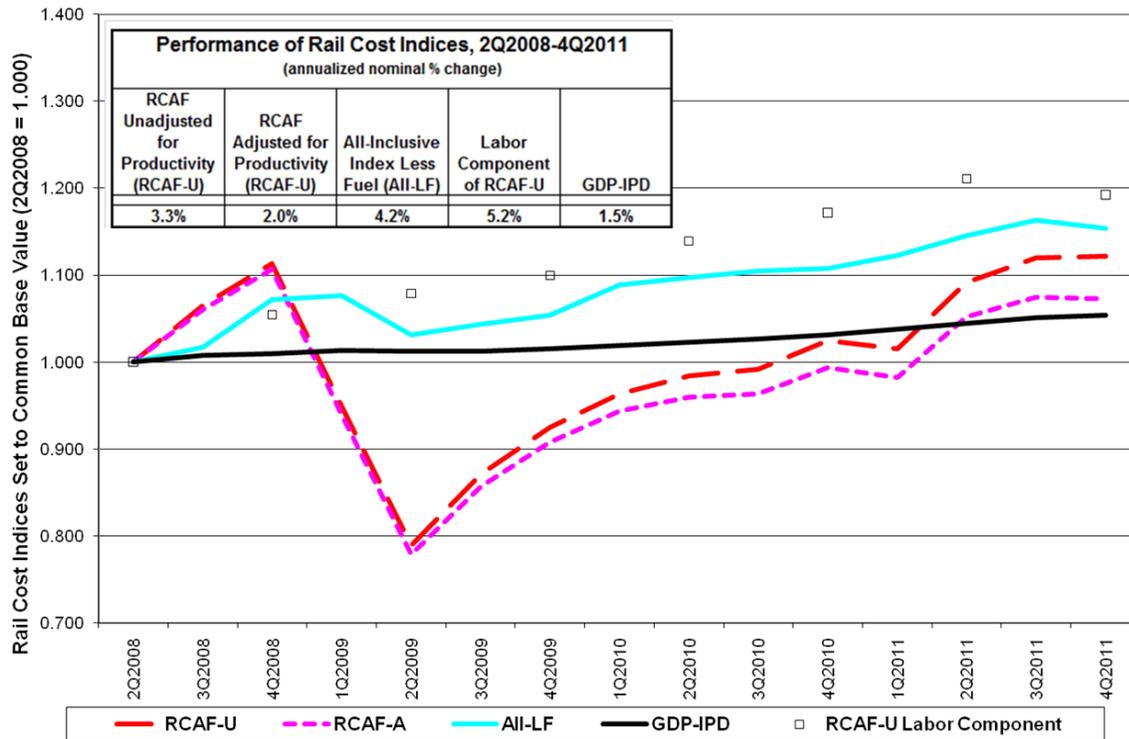
According to data from the AAR, the net change in the rail industry's fuel costs between 2Q2008 and 4Q2011 was a nominal decline of about 9% (or an annualized decline of about 2.6% per year. Over the same time period, equipment and other costs for the rail industry increased by an average of about 2.0% per year, only slightly faster than overall inflation of 1.5% per year.

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<sup>85</sup> The Rail Cost Adjustment Factor (RCAF) refers to several indices created for regulatory purposes by the STB, calculated by the AAR, and submitted to the STB for approval. The indices are intended to serve as measures of the rate of inflation in rail inputs. The meaning of various RCAF acronyms that appear in this section can be found in the insert in

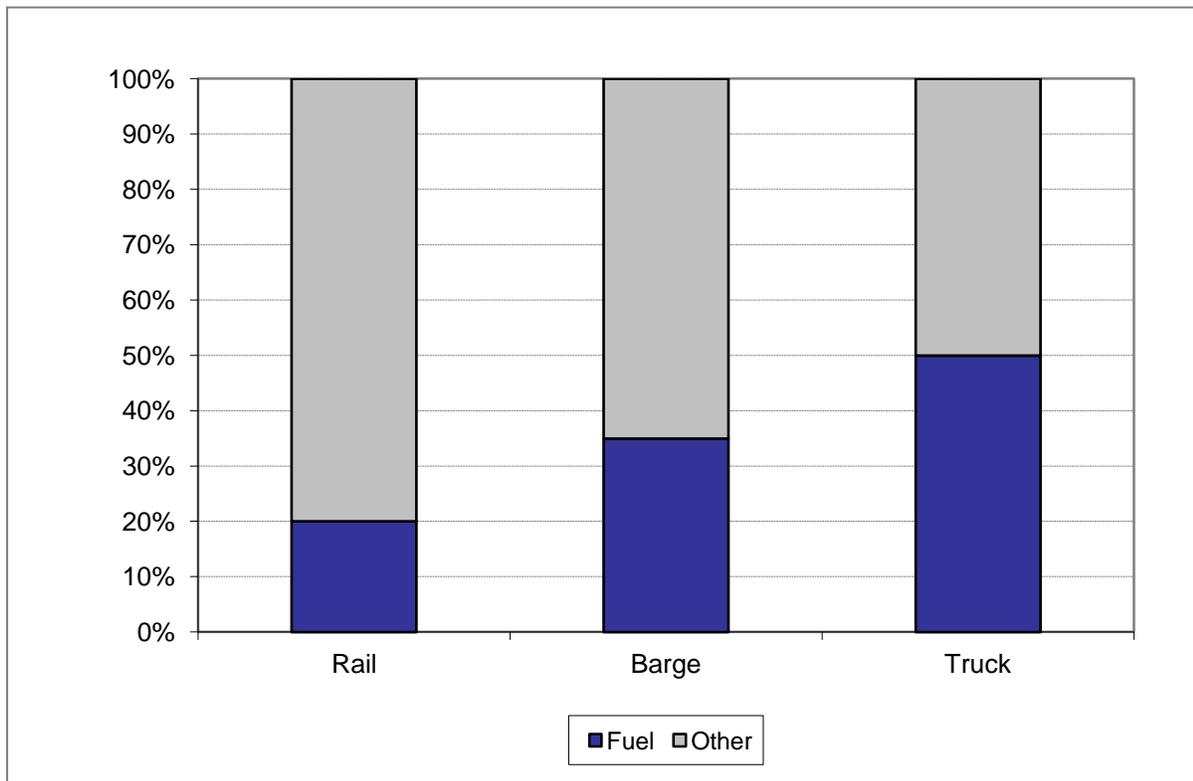
Figure 9-9.

**Figure 9-9 Rail Cost Indices Performance  
(2Q2008-4Q2011)**



The other major transportation modes used to ship coal (barge and truck) have cost drivers broadly similar to those for rail transportation (labor costs, fuel costs, and equipment costs). However, a significant difference in cost drivers between the transportation modes relates to the relative weighting of fuel costs for the different transportation modes. Estimates as shown in Figure 9-10 show that, at 2012 fuel prices, fuel costs accounted for about 20% of long-run marginal costs for the rail industry, 35% of long-run marginal costs for barges, and 50% of long-run marginal costs for trucks.

**Figure 9-10 Long-Run Marginal Cost Breakdown by Transportation Mode**



### 9.3.9 Market Drivers Moving Forward

#### Diesel Fuel Prices

The Energy Information Administration’s (EIA’s) Annual Energy Outlook (AEO)<sup>86</sup> forecast of long-term equilibrium prices for diesel fuel used in the transportation sector (see Table 9-16) shows expected prices ranging from about \$3.83/gallon in 2012 to about \$4.58/gallon in 2035 (2011 real dollars). This represents an annual real increase in diesel fuel prices of about 0.8%/year during 2012-2035. The coal transportation rate forecast for EPA Base Case v.5.13 assumes that this average rate of increase in diesel fuel prices will apply over EPA’s entire forecast period (2016-2050).

**Table 9-16 EIA AEO Diesel Fuel Forecast, 2012-2030  
(2011 Real Dollars)**

| Year                           | Rate (\$/gallon) |
|--------------------------------|------------------|
| 2012                           | 3.83             |
| 2015                           | 3.84             |
| 2020                           | 4.06             |
| 2025                           | 4.27             |
| 2030                           | 4.48             |
| 2035                           | 4.58             |
| Annualized % Change, 2025-2035 | 0.8%             |

Source: EIA

<sup>86</sup> As noted at the beginning of this section, the coal transportation rate assumptions for EPA Base Case v5.13 were finalized in March 2012. At that time, the Annual Energy Outlook 2012 forecast was the latest available.

## **Iron Ore Prices**

ABARES's<sup>87</sup> forecast of iron ore prices as depicted in Table 9-17 shows an expectation that iron ore prices will decline by about 22% in real terms for their 5-year forecast period (2012-2017) as a whole.

**Table 9-17 ABARES Forecast of Iron Ore Prices**

|  | <b>2011 US\$/metric tonne</b> |
|--|-------------------------------|
| ABARE Forecast of Average Contract Price for Australian Iron Ore Exports, 2012 | 137                           |
| ABARE Forecast for 2013  | 129                           |
| ABARE Forecast for 2014  | 125                           |
| ABARE Forecast for 2015  | 121                           |
| ABARE Forecast for 2016  | 115                           |
| ABARE Forecast for 2017  | 107                           |
| Total Percent Change (2012-2017)   | -22%                          |

Source: ABARES, Resources and Energy Quarterly, March 2012.

## **Labor Costs**

As noted earlier, labor costs for the rail industry are expected to increase approximately 1% faster than overall inflation, on average over the forecast period. Due to the fact that competition is stronger in the barge and trucking industries than in the rail industry, labor costs in the barge and truck industries are expected to increase at approximately the same rate as overall inflation, on average over the forecast period.

## **Productivity Gains**

The most recent data published by AAR (covering 2006-2010) shows that rail industry productivity increased at an annualized rate of approximately 0.8% per year during this period. However, due to limited competition in the rail industry, these productivity gains were generally not passed through to shippers. In addition, the potential for significant productivity gains in the trucking industry is relatively limited since truck load sizes, operating speeds, and truck driver hours are all regulated by law. Although increased lock outages and the associated congestion on the inland waterway system as the river infrastructure ages may reduce the rate of future productivity gains in the barge industry, limited productivity gains are expected to occur, and these productivity gains are expected to be largely passed through to shippers since the barge industry is highly competitive.

## **Long-Term Escalation of Coal Transportation Rates**

Based on the foregoing discussion, rail rates are expected to escalate at an average rate of 0.5% per year in real terms during 2013-2050. Over the same period, barge and lake vessel rates are expected to decline at an average rate of 0.2% per year, which reflects some pass-through of productivity gains in those highly competitive industries. Truck rates are expected to escalate at an average rate of 0.4%/year during 2013-2050, rates for conveyor transportation and transloading services are expected to be flat in real terms, on average over the forecast period.

The basis for these forecasts is summarized in

Table 9-18.

<sup>87</sup> ABARES (the Australian Bureau of Agricultural and Resource Economics and Sciences) is a branch of the Australian government that forecasts prices and trade volumes for a wide variety of commodities that Australia exports. Australia is a major exporter of iron ore, accounting for about 41% of total worldwide iron ore exports in 2011. See [www.daff.gov.au/abares](http://www.daff.gov.au/abares).

| Mode                          | Component      | Component Weighting | Real Escalation Before Productivity Adjustment (%/year) | Productivity Gains Passed Through to Shippers (%/year) | Real Escalation After Productivity Adjustment (%/year) |
|-------------------------------|----------------|---------------------|---|--|--|
| <b>Rail</b>                   | Fuel           | 20%                 | 0.8%  |  |  |
|                               | Labor          | 35%                 | 1.0%  |  |  |
|                               | Equipment      | 45%                 | 0.0%  |  |  |
|                               | <b>Total</b>   | <b>100%</b>         | <b>0.5%</b>   | <b>0.0%</b>  | <b>0.5%</b>  |
| <b>Barge &amp; Vessel</b>     | Fuel           | 35%                 | 0.8%  |  |  |
|                               | Labor & Equip. | 65%                 | 0.0%  |  |  |
|                               | <b>Total</b>   | <b>100%</b>         | <b>0.3%</b>   | <b>0.5%</b>  | <b>-0.2%</b>   |
| <b>Truck</b>                  | Fuel           | 50%                 | 0.8%  |  |  |
|                               | Labor & Equip. | 50%                 | 0.0%  |  |  |
|                               | <b>Total</b>   | <b>100%</b>         | <b>0.4%</b>   | <b>0.0%</b>  | <b>0.4%</b>  |
| <b>Conveyor</b>               | <b>Total</b>   |                     | <b>0.0%</b>   | <b>0.0%</b>  | <b>0.0%</b>  |
| <b>Transloading Terminals</b> | <b>Total</b>   |                     | <b>0.0%</b>   | <b>0.0%</b>  | <b>0.0%</b>  |

**Table 9-18 Summary of Expected Escalation for Coal Transportation Rates, 2013-2050**

### 9.3.10 Other Considerations

#### Estimated Construction Costs for Railcar Unloaders and Rail Spurs at Mine-Mouth Plants

In order to allow mine-mouth generating plants (i.e., coal-fired generating plants which take all of their current coal supply from a single nearby mine) to access additional types of coal, the costs of constructing facilities that would allow rail delivery of coal was estimated for almost all<sup>88</sup> of the mine-mouth generating plants with total capacity of 200 MW or more.

The facilities needed for rail delivery of coal to generating plants of this relatively large size were assumed to be: a) a rotary dump railcar unloader capable of handling unit train coal shipments, which is estimated to cost about \$25 million installed (in 2011\$). b) at least three miles of loop track, which would allow for one trainload of coal to be unloaded, and a second trainload of coal to simultaneously be parked on the plant site preparatory to unloading, and c) at least one mile of additional rail spur track to connect the trackage on the plant site with the nearest railroad main line. Since construction costs for rail trackage capable of handling coal trains is estimated at about \$3 million per mile (in 2011\$), the minimum investment required to construct the facilities needed for rail delivery of coal was estimated at \$37 million. In some cases, the length of the rail spur required to reach the nearest main line (which was estimated on a plant-specific basis) is considerably longer than one mile. In cases where a rail spur longer than one mile was required to reach the main line, the cost of the additional trackage was estimated using the same construction cost of \$3 million per mile (2011\$) referenced earlier.

<sup>88</sup> The costs of rail coal delivery were not estimated for mine-mouth plants located in the Powder River Basin or Illinois Basin coal fields, since the coal reserves in these coal fields are among the largest, and among the cheapest to mine, anywhere in the United States.

The total cost of the facilities required for rail delivery of coal was converted to an annualized basis based on each plant's historical average coal burn from 2007-2011, and a capital recovery factor of 11.29%.

The cost of transporting additional types of coal to each mine-mouth generating plant was then calculated using the same methodology described earlier in this section, and added to the annualized cost for the rail delivery facilities, to arrive at an estimated "all-in" cost for delivering additional types of coal to the mine-mouth plants.

#### 9.4 Coal Exports, Imports, and Non-Electric Sectors Demand

The coal supply curves used in EPA Base Case v.5.13 represent the total steam coal supply in the United States. While the U.S. power sector is the largest consumer of native coal – roughly 93% of mined U.S. coal in 2012 was used in electricity generation – non-electricity demand must also be taken into consideration in IPM modeling in order to determine the market clearing price. Furthermore, some coal mined within the U.S. is exported out of the domestic market, and some foreign coal is imported for use in electricity generation, and these changes in the coal supply must also be detailed in the modeling of the coal supply available to coal power plants. The projections for imports, exports, non-electric sector coal demand, and coal to liquids demand are based on EIA's AEO 2013.

In EPA Base Case v.5.13, coal exports, coal-serving residential, commercial and industrial demand, and coal to liquids demand are designed to correspond as closely as possible to the projections in AEO 2013 both in terms of the coal supply regions and coal grades that meet this demand. The projections used exclude exports to Canada, as the Canadian market is modeled endogenously within IPM. First, the subset of coal supply regions and coal grades in EPA Base Case v.5.13 are identified that are contained in or overlap geographically with those in EIA Coal Market Module (CMM) supply regions and coal grades that are projected as serving exports and non-electric sector demand in AEO 2013. Next, coal for exports and non-electricity demand are constrained by CMM supply region and coal grade to meet the levels projected in AEO 2013. These levels are shown in Table 9-19.

**Table 9-19 Coal Exports**

| Name  | 2016  | 2018  | 2020  | 2025  | 2030  | 2040-2050 |
|---|-------|-------|-------|-------|-------|-----------|
| Alaska/Washington - Subbituminous Low Sulfur    | 1.37  | 1.44  | 1.52  | 1.71  | 2.04  | 2.84      |
| Central Appalachia - Bituminous Medium Sulfur   | 9.33  | 9.08  | 8.78  | 7.58  | 7.73  | 6.33      |
| East Interior - Bituminous High Sulfur          | 16.54 | 18.23 | 20.10 | 25.65 | 32.74 | 45.51     |
| Northern Appalachia - Bituminous High Sulfur    | 4.18  | 4.15  | 4.07  | 3.58  | 3.65  | 2.98      |
| Northern Appalachia - Bituminous Medium Sulfur  | 0.44  | 0.32  | 0.23  | 0.10  | 0.10  | 0.10      |
| Rocky Mountain - Bituminous Low Sulfur          | 3.21  | 3.54  | 3.90  | 3.92  | 4.73  | 4.45      |
| Western Montana - Subbituminous Low Sulfur      | 8.22  | 9.07  | 4.85  | 12.83 | 16.49 | 27.28     |
| Wyoming Southern PRB - Subbituminous Low Sulfur | 0.42  | 0.31  | 6.21  | 0.10  | 0.10  | 0.10      |

Table 9-20 and Table 9-21. (Since the AEO 2013 time horizon extends to 2040 and EPA Base Case v.5.13 to 2050, the AEO projected levels for 2040 are maintained through 2050.). IPM then endogenously determines which IPM coal supply region(s) and coal grade(s) will be selected to meet the required export or non-electric sector coal demand as part of the cost-minimization coal market equilibrium. Since there are more coal supply regions and coal grades in EPA Base Case v.5.13 than in AEO 2013, the specific regions and coal grades that serve export and non-electric sector demand are not pre-specified but modeled.

**Table 9-20 Residential, Commercial, and Industrial Demand**

| Name  | 2016  | 2018  | 2020  | 2025  | 2030  | 2040-2050 |
|---|-------|-------|-------|-------|-------|-----------|
| Alaska/Washington - Subbituminous Low Sulfur  | 0.59  | 0.59  | 0.59  | 0.59  | 0.59  | 0.60      |
| Central Appalachia - Bituminous Low Sulfur    | 4.02  | 4.03  | 4.05  | 4.08  | 4.08  | 4.28      |
| Central Appalachia - Bituminous Medium Sulfur | 11.68 | 11.68 | 11.75 | 11.82 | 11.83 | 12.41     |

| Name   | 2016 | 2018 | 2020 | 2025 | 2030 | 2040-2050 |
|--|------|------|------|------|------|-----------|
| East Interior - Bituminous High Sulfur           | 7.04 | 7.00 | 7.00 | 6.97 | 6.89 | 7.04      |
| East Interior - Bituminous Medium Sulfur         | 0.82 | 0.83 | 0.83 | 0.83 | 0.83 | 0.85      |
| Northern Appalachia - Bituminous High Sulfur     | 1.63 | 1.62 | 1.62 | 1.62 | 1.61 | 1.66      |
| Northern Appalachia - Bituminous Medium Sulfur   | 3.04 | 3.05 | 3.06 | 3.08 | 3.08 | 3.24      |
| Rocky Mountain - Bituminous Low Sulfur           | 4.05 | 4.06 | 4.08 | 4.10 | 4.10 | 4.36      |
| Southern Appalachia - Bituminous Low Sulfur      | 0.17 | 0.17 | 0.17 | 0.17 | 0.18 | 0.19      |
| Southern Appalachia - Bituminous Medium Sulfur   | 1.13 | 1.13 | 1.14 | 1.15 | 1.16 | 1.24      |
| Wyoming Southern PRB - Subbituminous Low Sulfur  | 2.58 | 2.56 | 2.56 | 2.55 | 2.52 | 2.58      |
| Dakota Lignite - Lignite Medium Sulfur           | 6.37 | 6.34 | 6.34 | 6.31 | 6.25 | 6.38      |
| Wyoming Northern PRB - Subbituminous Low Sulfur  | 5.04 | 5.04 | 5.06 | 5.09 | 5.09 | 5.31      |
| West Interior - Bituminous High Sulfur           | 0.67 | 0.67 | 0.68 | 0.69 | 0.69 | 0.74      |
| Arizona/New Mexico - Bituminous Low Sulfur       | 0.46 | 0.47 | 0.47 | 0.47 | 0.47 | 0.50      |
| Arizona/New Mexico - Subbituminous Medium Sulfur | 0.11 | 0.11 | 0.11 | 0.11 | 0.12 | 0.12      |
| Western Wyoming - Subbituminous Low Sulfur       | 1.03 | 1.03 | 1.04 | 1.04 | 1.05 | 1.12      |
| Western Wyoming - Subbituminous Medium Sulfur    | 1.12 | 1.13 | 1.13 | 1.14 | 1.15 | 1.24      |
| Gulf Lignite - Lignite High Sulfur               | 0.84 | 0.85 | 0.85 | 0.87 | 0.87 | 0.93      |

**Table 9-21 Coal to Liquids Demand**

| Name  | 2016 | 2018 | 2020 | 2025 | 2030 | 2040-2050 |
|---|------|------|------|------|------|-----------|
| Rocky Mountain - Bituminous Low Sulfur          | 0    | 0    | 0    | 5.61 | 3.36 | 4.02      |
| Wyoming Southern PRB - Subbituminous Low Sulfur | 0    | 0    | 0    | 0.00 | 0.00 | 8.94      |
| Wyoming Northern PRB - Subbituminous Low Sulfur | 0    | 0    | 0    | 0.42 | 5.49 | 0.00      |
| Western Montana - Subbituminous Low Sulfur      | 0    | 0    | 0    | 0.00 | 0.00 | 1.36      |

Imported coal is only available to 39 coal facilities which are eligible to receive imported coal. These facilities which may receive imported coal, along with the cost of transporting this coal to the demand regions, are in Excerpt from

Excerpt from Table 9-23. The total US imports of steam coal are limited to AEO 2013 projections as shown in Table 9-22.

**Table 9-22 Coal Import Limits**

|  | 2016 | 2018 | 2020 | 2025 | 2030 | 2040-2050 |
|--|------|------|------|------|------|-----------|
| Annual Coal Imports Cap (Million Short Tons) | 1.50 | 0    | 0    | 3.60 | 3.78 | 34.28     |

## Attachment 9-1 Mining Cost Estimation Methodology and Assumptions

### Labor Costs

Productivity and labor cost rates are utilized to estimate the total labor cost associated with the mining operation. This excludes labor involved in any coal processing / preparation plant.

Labor productivity is used to calculate mine labor and salaries by applying an average cost per employee hour to the labor productivity figure reported by MSHA or estimated based on comparable mines.

Labor costs rates are estimated based on employment data reported to MSHA. MSHA data provides employment numbers, employee hours worked and tons of coal produced. These data are combined with labor rate estimates from various sources such as union contracts, census data and other sources such as state employment websites to determine a cost per ton for mine labor. Hourly labor costs vary between United Mine Workers of America (UMWA) and non-union mines, and include benefits and payroll taxes. Employees assigned to preparation plants, surface activities, and offices are excluded from this category and are accounted for under coal washing costs and mine overhead.

### Surface Mining

The prime (raw coal) strip ratio and overburden volume is estimated on a year by year basis. Estimates are entered of the amount of overburden<sup>89</sup> moved each year, split by method to allow for different unit mining costs. The unit rate cost for each method excludes any drill and blast costs, and labor costs, as these are accounted for separately. Drill and blast costs are estimated as an average cost per volume of prime overburden. If applicable, dragline re-handle is estimated separately and a summation gives the total overburden moved.

The different overburden removal methods are:

- Dragline - the estimated volume of prime overburden moved
- Dragline re-handle - the estimated volume of any re-handled overburden
- Truck and shovel - including excavators.
- Other - examples would be dozer push, front end loader, or cast blasting. If overburden is moved by cast blasting the unit rate is taken to be zero as the cost is already included in the drill and blast estimate.

Surface mining costs also include the cost of coal mining estimated on a raw ton basis.

### Underground Mining

Raw coal production is split by type into either continuous miner or longwall. Cost estimates can be input either on a unit rate or a fixed dollar amount, as the cost structure of underground mining generally has a large fixed component from year to year. Costs are divided into:

- Longwall
- Continuous miner
- Underground services

Underground services costs cover categories such as ventilation, conveyor transport, gas drainage, secondary roof support etc.

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<sup>89</sup> Overburden refers to the surface soil and rock that must be removed to uncover the coal.

## Mine Site Other

This covers any mine site costs that are outside the direct production process. Examples are ongoing rehabilitation/reclamation, security, community development costs.

## Raw Haul

Costs for transporting raw coal from the mining location to the raw coal stockpile at the coal preparation plant or rail load out. A distance and a unit rate allows for an increasing cost over time if required.

### **Excerpt from Table 9-23 Coal Transportation Matrix in EPA Base Case v.5.13**

This is a small excerpt of the data in Table 9-23. The complete data set in spreadsheet format can be downloaded via the link found at [www.epa.gov/airmarkets/progsregs/epa-ipm/BaseCasev513.html](http://www.epa.gov/airmarkets/progsregs/epa-ipm/BaseCasev513.html)

| Link # | Plant Name                             | ORIS Plant Code | Coal Supply Region Code | Coal Supply Region Description     | Total Cost (2012 Rate in 2011\$/Ton) | Escalation/Year (2013-2025) | Escalation/Year (2026-2050) |
|--------|--|-----------------|-------------------------|------------------------------------|--------------------------------------|-----------------------------|-----------------------------|
| 1      | Aurora Energy LLC Chena                | 79              | AK                      | Alaska                             | \$3.52                               | 1.0050                      | 1.0050                      |
| 2      | Eielson AFB Central Heat & Power Plant | 50392           | AK                      | Alaska                             | \$4.32                               | 1.0050                      | 1.0050                      |
| 3      | Healy                                  | 6288            | AK                      | Alaska                             | \$1.00                               | 1.0000                      | 1.0000                      |
| 4      | Barry                                  | 3               | CG                      | Colorado, Green River              | \$44.85                              | 1.0039                      | 1.0039                      |
| 5      | Barry                                  | 3               | CR                      | Colorado, Raton                    | \$42.85                              | 1.0039                      | 1.0039                      |
| 6      | Barry                                  | 3               | CU                      | Colorado, Uinta                    | \$48.85                              | 1.0040                      | 1.0040                      |
| 7      | Barry                                  | 3               | IL                      | Illinois                           | \$20.50                              | 1.0031                      | 1.0031                      |
| 8      | Barry                                  | 3               | IN                      | Indiana                            | \$24.00                              | 1.0034                      | 1.0034                      |
| 9      | Barry                                  | 3               | KE                      | Kentucky East                      | \$26.04                              | 1.0031                      | 1.0031                      |
| 10     | Barry                                  | 3               | KW                      | Kentucky West                      | \$19.78                              | 1.0031                      | 1.0031                      |
| 11     | Barry                                  | 3               | PW                      | Pennsylvania, West                 | \$25.77                              | 1.0028                      | 1.0028                      |
| 12     | Barry                                  | 3               | WH                      | Wyoming, Powder River Basin (8800) | \$43.13                              | 1.0039                      | 1.0039                      |
| 13     | Barry                                  | 3               | WL                      | Wyoming, Powder River Basin (8400) | \$42.90                              | 1.0039                      | 1.0039                      |
| 14     | Barry                                  | 3               | WN                      | West Virginia, North               | \$23.04                              | 1.0028                      | 1.0028                      |
| 15     | Barry                                  | 3               | WS                      | West Virginia, South               | \$27.45                              | 1.0031                      | 1.0031                      |
| 16     | Barry                                  | 3               | I1                      | Imports-1 (Colombia)               | \$14.75                              | 0.9995                      | 0.9995                      |
| 17     | Charles R Lowman                       | 56              | CG                      | Colorado, Green River              | \$45.25                              | 1.0039                      | 1.0039                      |
| 18     | Charles R Lowman                       | 56              | CR                      | Colorado, Raton                    | \$43.25                              | 1.0039                      | 1.0039                      |
| 19     | Charles R Lowman                       | 56              | CU                      | Colorado, Uinta                    | \$49.25                              | 1.0040                      | 1.0040                      |
| 20     | Charles R Lowman                       | 56              | IL                      | Illinois                           | \$20.90                              | 1.0031                      | 1.0031                      |

### **Table 9-24 Coal Supply Curves in EPA Base Case v.5.13**

This is a small excerpt of the data and graphs in Table 9-24. The complete data set in spreadsheet format can be downloaded via the link found at [www.epa.gov/airmarkets/progsregs/epa-ipm/BaseCasev513.html](http://www.epa.gov/airmarkets/progsregs/epa-ipm/BaseCasev513.html).

| Year | Coal Supply Region | Coal Grade | Step Name | Heat Content (MMBtu/short ton) | Cost of Production (2011\$/short ton) | Coal Production (Million short tons per annum) | End 2015 Coal Reserves (Million short tons) |
|------|--------------------|------------|-----------|--------------------------------|---------------------------------------|--|---|
| 2016 | AL                 | BB         | E1        | 25.5                           | 47.51                                 | 0.09   | 0.19  |
| 2016 | AL                 | BB         | E2        | 25.5                           | 75.16                                 | 0.06   | 0.30  |
| 2016 | AL                 | BB         | E3        | 25.5                           | 81.84                                 | 1.18   | 8.37  |
| 2016 | AL                 | BB         | E4        | 25.5                           | 88.23                                 | 0.14   | 1.39  |
| 2016 | AL                 | BB         | E5        | 25.5                           | 96.45                                 | 0.47   | 4.51  |
| 2016 | AL                 | BB         | E6        | 25.5                           | 101.89                                | 0.07   | 0.69  |
| 2016 | AL                 | BB         | E7        | 25.5                           | 103.68                                | 0.10   | 0.94  |
| 2016 | AL                 | BB         | E8        | 25.5                           | 110.04                                | 0.08   | 0.75  |
| 2016 | AL                 | BB         | N1        | 25.5                           | 115.74                                | 0.12   | 500.00                                      |
| 2016 | AL                 | BE         | E1        | 24                             | 35.96                                 | 0.21   | 0.36  |

| Year | Coal Supply Region | Coal Grade | Step Name | Heat Content (MMBtu/short ton) | Cost of Production (2011\$/short ton) | Coal Production (Million short tons per annum) | End 2015 Coal Reserves (Million short tons) |
|------|--------------------|------------|-----------|--------------------------------|---------------------------------------|--|---|
| 2016 | AL                 | BE         | E2        | 24                             | 47.51                                 | 0.30   | 0.37  |
| 2016 | AL                 | BE         | E3        | 24                             | 52.89                                 | 3.41   | 13.66                                       |
| 2016 | AL                 | BE         | E4        | 24                             | 71.05                                 | 0.38   | 1.87  |
| 2016 | AL                 | BE         | E5        | 24                             | 90.23                                 | 2.20   | 18.68                                       |
| 2016 | AL                 | BE         | E6        | 24                             | 102.49                                | 2.64   | 25.32                                       |
| 2016 | AL                 | BE         | E7        | 24                             | 104.83                                | 0.30   | 2.80  |
| 2016 | AL                 | BE         | E8        | 24                             | 137.98                                | 0.09   | 0.90  |
| 2016 | AL                 | BE         | N1        | 24                             | 108.27                                | 0.28   | 500.00                                      |