

Impact of EPA's Regulatory Assault on Power Plants: New Regulations to Take 33 GW of Electricity Generation Offline and the Plant Closing Announcements Keep Coming...

So if somebody wants to build a coal-fired plant they can. It's just that it will bankrupt them..." – Barack Obama speaking to San Francisco Chronicle, January 2008

February 7, 2012—Update

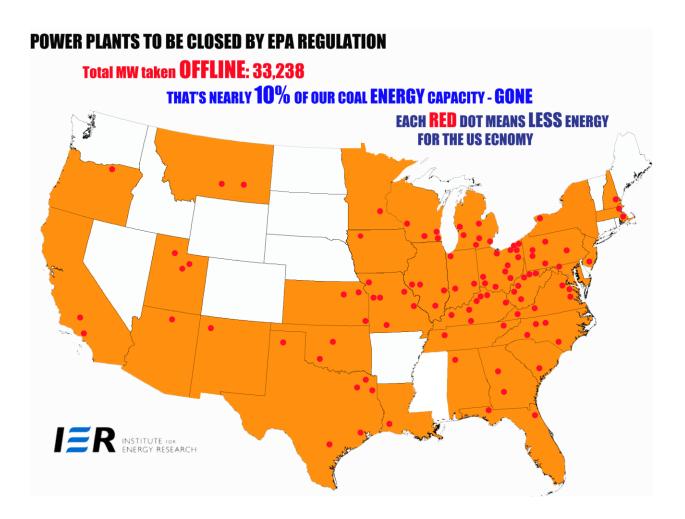
More than 33 gigawatts (GW) of electrical generating capacity are now set to retire because of the Environmental Protection Agency's (EPA) Mercury and Air Toxics Rule (colloquially called Utility MACT)¹ and the Cross State Air Pollution Rule (CSAPR)² regulations. Most of these retirements will come from coal-fired power plants, shuttering nearly 10 percent of the U.S.'s coal-fired generating capacity.

This report is an update of a report the Institute for Energy Research (IER) issued in October 2011.³ In the original report, we calculated that 28 GW of generating capacity would close as a result of EPA's regulations. At the time, we warned that "this number will grow as plant operators continue to release their EPA compliance plans." Unfortunately, this statement has proven to be true. This update, a mere four months later, shows that over 33 GW of electrical generating capacity will close—nearly a 5 GW increase.

According to EPA, their modeling of Utility MACT and CSAPR indicates that these regulations will only shutter 14.5 GW of electricity generation capacity. But events in the real world already show that EPA's modeling is a gross underestimate.

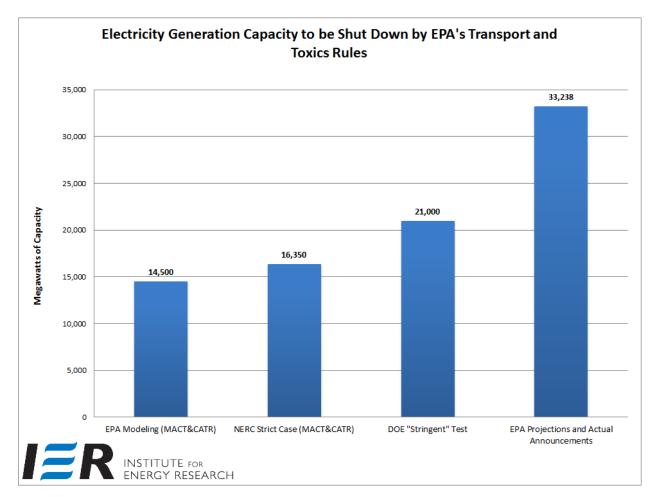
To calculate the impact of EPA's rules, we first assumed that EPA's modeling was correct. Then, we looked at statements, filings, and announcements from electrical generators where the generators were closing power plants and citing EPA's regulations as the precipitating cause of the plant closures. We then compared EPA's modeling outputs with the announcements and created a master list of plant closures as the result of EPA regulations (the master list is below).

Combining actual announcements with EPA's modeling shows that EPA's modeling grossly underestimates the actual number of closures. As noted above, EPA calculated that only 14.5 GW of electrical generating capacity would close as a result of its rules. But the reality is that over 33 GW of power generating capacity will close—over twice as much as EPA's modeling predicted. Worse, as utilities continue to assess how to comply with EPA's finalized Utility MACT rule and CSAPR, there will likely be further plant closure announcements in the coming weeks and months.



Since Our First Report was Released in October, an Additional 5 GW of Retirements Due to EPA Regulations Have Been Announced

Operators in Georgia, Maryland, Michigan, New Mexico, Ohio, Pennsylvania, and Wisconsin have announced new closures since we first published our closure list four months ago. Additionally, operators in Minnesota announced they would cease plans to convert a coal plant to natural gas, letting the plant retire due to EPA regulations.⁴ In just two short months, retirements related to EPA regulations have grown by 5 GW, over one third of the *total* retirements predicted by EPA.



NERC is Concerned about Reliability even though It Underestimates the Amount of Closures

It should be further noted that the North American Reliability Corporation's (NERC) modeling of the MACT rule and CSAPR estimate that under the worst case, or "strict" scenarios, 16.3 GW of electricity capacity will be closed due to the regulations, and the Department of Energy's (DOE) "stringent" test shows that only 21 GW of generating capacity will be closed. Even though NERC's estimate is much lower than what our analysis shows, NERC is concerned that the closures will cause electricity reliability problems.⁵ How much greater will the reliability problems be, given that retirements appears to be twice as great as NERC estimates?

Announced and EPA Projected Retirements Are Significantly Higher than DOE's Worst Case Scenarios

The Obama administration's DOE recently released a study claiming that even under a theoretical "stringent" test, EPA regulations would only close 21 GW of generation. EPA has since claimed this study proves regulations will not threaten reliability. Our analysis, however, shows that between EPA projections and operator announcements, over 33 GW of generation will close—almost 12 GW more than DOE's supposedly ultra-strict test scenario.

Michigan and Ohio Hit Worst By Latest Announcements

In our updated analysis, the vast majority of new announced retirements will occur in Michigan and Ohio. Operators in Michigan have announced more than 1 GW of closures due to EPA regulations.⁶ Michigan, already reeling from record high unemployment, has warned that further closures due to the regulations could threaten reliability in both the Upper and Lower Peninsulas. The situation is not better in Ohio. *FirstEnergy* has announced more than 2.3 GW of closures due to EPA regulations in Ohio.⁷

Updated List of Power Plants Set to Close According to EPA's Modeling and Public Disclosures

The following is a list of all of the power plants that are set to close according to EPA's modeling combined with public disclosures. A complete explanation of the methodology we used to compile this list is in the Appendix.

¹ Environmental Protection Agency, *Regulatory Impact Analysis of the Proposed Toxics Rule*, Mar. 2011, http://www.epa.gov/ttn/atw/utility/ria_toxics_rule.pdf

² Environmental Protection Agency, *Regulatory Impact Analysis (RIA) for the final Transport Rule*, http://www.epa.gov/airtransport/pdfs/FinalRIA.pdf

³ Institute for Energy Research, *IER Identifies Coal Fired Power Plants Likely to Close as Result of EPA Regulations*, Oct. 7, 2011, http://www.instituteforenergyresearch.org/2011/10/07/ier-identifies-coal-fired-power-plants-likely-to-close-as-result-of-epa-regulations/.

⁴ David Shaffer, *Xcel's power pullback*, STAR TRIBUNE, Dec. 1. 2011,

http://www.startribune.com/business/134825258.html.

⁵ See North American Electric Reliability Corp, 2011 Long-Term Reliability Assessment, Nov. 2011,

http://www.nerc.com/files/2011LTRA_Final.pdf.

⁶ Cassandra Sweet, *Michigan Utility to Scrap 'Clean-Coal' Plant, Shut Older Coal Unit,* WALL STREET JOURNAL, http://online.wsj.com/article/BT-CO-20111202-713204.html

⁷ FirstEnergy, *FirstEnergy, Citing Impact of Environmental Regulations, Will Retire Six Coal-Fired Power Plants* (Press Release), Jan. 26, 2012, http://www.prnewswire.com/news-releases/firstenergy-citing-impact-of-environmental-regulations-will-retire-six-coal-fired-power-plants-138115263.html.

Power Plants Retired by EPA Regulations (EPA Modeling and Announced Retirements) ** February 7, 2012 Update **

							Capacity	_	Fuel	
Plant Name	Unit	Address	<u>City</u>	<u>County</u>	State	<u>Zip</u>	<u>(MW)</u>	Year	Source	Citation
		900 Steam Plant								IPM Parsed Results - Policy Case
Colbert	1	Rd.	Tuscumbia	Colbert	AL	35674	176	2015	Coal	(Toxics Rule)
		900 Steam Plant								IPM Parsed Results - Policy Case
Colbert	2	Rd.	Tuscumbia	Colbert	AL	35674	176	2015	Coal	(Toxics Rule)
		900 Steam Plant								IPM Parsed Results - Policy Case
Colbert	3	Rd.	Tuscumbia	Colbert	AL	35674	176	2015	Coal	(Toxics Rule)
		900 Steam Plant								IPM Parsed Results - Policy Case
Colbert	4	Rd.	Tuscumbia	Colbert	AL	35674	172	2015	Coal	(Toxics Rule)
										IPM Parsed Results - Policy Case
Navajo	3	P.O. Box 850	Page	Coconino	AZ	86040	750	2015	Coal	(Toxics Rule)
		1175 Carrack Ave,								IPM Parsed Results - Policy Case
BP Wilmington Calciner	GEN1		Wilmington	Los Angeles	CA	90748	29	2015	Coke	(Toxics Rule)
		16608 Porterville								IPM Parsed Results - Policy Case
Rio Bravo Poso	CFB	Hwy	Bakersfield	Kern	CA	93380	33	2015	Coke	(Toxics Rule)
Northside Generating		4377 Heckscher								IPM Parsed Results - Policy Case
Station	1	Drive	Jacksonville	Duval	FL	32226	275	2015	Coke	(Toxics Rule)
Northside Generating		4377 Heckscher								IPM Parsed Results - Policy Case
Station	2	Drive	Jacksonville	Duval	FL	32226	275	2015	Coke	(Toxics Rule)
		1460 Gulf Power								IPM Parsed Results - Policy Case
Scholz	1	Road	Sneeds	Jackson	FL	32460	49	2015	Coal	(Toxics Rule)
		1460 Gulf Power								IPM Parsed Results - Policy Case
Scholz	2	Road	Sneeds	Jackson	FL	32460	49	2015	Coal	(Toxics Rule)
										Southern Company Comments
		1100 Milledgeville								on EPA NESHAP Action (Aug. 4,
Harllee Branch	1	Road	Milledgeville	Putnam	GA	31061	262	2015	Coal	2011).
										Southern Company Comments
		1100 Milledgeville								on EPA NESHAP Action (Aug. 4,
Harllee Branch	2	Road	Milledgeville	Putnam	GA	31061	319	2015	Coal	2011).
										Power play: Rate hikes for
										Georgia electricity consumers
		5200 Radium								might be just beginning, Ledger-
Plant Mitchell	4C	Springs Road	Albany	Dougherty	GA	31705	42	2014	Coal	Enquirer (Oct. 1, 2011).
										IPM Parsed Results - Policy Case
Dubuque	1	920 Kerper Road	Dubuque	Dubuque	IA	52001	35	2015	Coal	(Toxics Rule)
										IPM Parsed Results - Policy Case
Dubuque	5	920 Kerper Road	Dubuque	Dubuque	IA	52001	30	2015	Coal	(Toxics Rule)
										IPM Parsed Results - Policy Case
Earl F Wisdom	1	3365 165 Ave	Spencer	Clay	IA	51301	38	2015	Coal	(Toxics Rule)

					<u>.</u>		Capacity		Fuel	
Plant Name	<u>Unit</u>	Address 3100 Stevenson	<u>City</u>	<u>County</u>	<u>State</u>	<u> Zıp</u>	<u>(MW)</u>	Year	<u>Source</u>	Citation IPM Parsed Results - Policy Case
Dallman		Drive	Springfield	Sangamon	IL	62703	86	2015	Coal	(Toxics Rule)
Daiiman	51	3100 Stevenson	Springlieid	Sangamon		02703	00	2013	Cuai	IPM Parsed Results - Policy Case
Dallman	32	Drive	Springfield	Sangamon	IL	62703	87	2015	Coal	(Toxics Rule)
Daiman	02	Biito	opinightid	Canganion		02100	01	2010	Coul	Ameren to shutter 2 coal plants in
		15142 E. 1900th								Illinois, Chicago Tribune (Oct. 4,
Hutsonville	3	Ave.	Hutsonville	Crawford	IL	62433	75	2012	Coal	2011).
										Ameren to shutter 2 coal plants in
		15142 E. 1900th								Illinois, Chicago Tribune (Oct. 4,
Hutsonville	4	Ave.	Hutsonville	Crawford	IL	62433	75	2012	Coal	2011).
										IPM Parsed Results - Policy Case
		11543 Lake of								(Toxics Rule/Clean Air Transport
Marion	4	Egypt Rd.	Marion	Williamson	IL	62959	170	2014	Coal	Rule)
										Ameren to shutter 2 coal plants in
		800 W.								Illinois, Chicago Tribune (Oct. 4,
Meredosia	4	Washington	Meredosia	Morgan	IL	62665	166	2012	Oil	2011).
										Ameren to shutter 2 coal plants in
										Illinois, Chicago Tribune (Oct. 4,
		800 W.								2011); IPM Parsed Results -
Meredosia	5	Washington	Meredosia	Morgan	IL	62665	203	2012	Coal	Policy Case (Toxics Rule).
										Aging Indiana Power Plant to
										Shut Down, Cutting Chicago-
		103rd St. & Lake		1 - 1 -		10005	407	0045		Area Air Pollution, Chicago
State Line	1	Michigan	Hammond	Lake	IN	46325	197	2015	Coal	Tribune (May 5, 2011). Aging Indiana Power Plant to
										Shut Down, Cutting Chicago-
		103rd St. & Lake								Area Air Pollution, Chicago
State Line	2	Michigan	Hammond	Lake	IN	46325	100	2015	Coal	Tribune (May 5, 2011).
	2	Michigan	Папппопо	Lake		40323	100	2013	Cuai	Aging Indiana Power Plant to
										Shut Down, Cutting Chicago-
		103rd St. & Lake								Area Air Pollution, Chicago
State Line	3	Michigan	Hammond	Lake	IN	46325	318	2015	Coal	Tribune <i>(May 5, 2011)</i>
	-						0.0			Aging Indiana Power Plant to
										Shut Down, Cutting Chicago-
		103rd St. & Lake								Area Air Pollution, Chicago
State Line	4	Michigan	Hammond	Lake	IN	46325	180	2015	Coal	Tribune <i>(May 5, 2011)</i>
										IPM Parsed Results - Policy Case
Tanners Creek	1	800 AEP Drive	Lawrenceburg	Dearborn	IN	47025	145	2015	Coal	(Toxics Rule)

							Capacity	-	Fuel	
Plant Name	<u>Unit</u>	Address	City	County	<u>State</u>	Zip	<u>(MW)</u>	Year	<u>Source</u>	Citation
										AEP Shares Plan For
										Compliance With Proposed EPA
										Regulations, Press Release
Tanners Creek	2	800 AEP Drive	Lawrenceburg	Lawrenceburg	IN	47025	153	12/31/2014	Coal	(June 9, 2011)
										AEP Shares Plan For
										Compliance With Proposed EPA
						47005	045	40/04/0044		Regulations, Press Release
Tanners Creek	3	800 AEP Drive	Lawrenceburg	Lawrenceburg	IN	47025	215	12/31/2014	Coal	(June 9, 2011)
										EPA regs may force Duke to shut
Wabash River	2	450 Bolton Rd	Terre Haute	Vice	IN	47885	113	2014	Coal	Indiana coal plant, Reuters (Sep.
Wabash River	2			Vigo	IIN	47000	113	2014	Coal	20, 2011) EPA regs may force Duke to shut
										Indiana coal plant, Reuters (Sep.
Wabash River	3	450 Bolton Rd	Terre Haute	Vigo	IN	47885	123	2014	Coal	20, 2011)
	5		Terre Haute	Vigo	11 N	47005	125	2014	Coal	EPA regs may force Duke to shut
										Indiana coal plant, Reuters (Sep.
Wabash River	4	450 Bolton Rd	Terre Haute	Vigo	IN	47885	113	2014	Coal	20, 2011)
				vigo				2011	o oui	EPA regs may force Duke to shut
										Indiana coal plant, Reuters (Sep.
Wabash River	5	450 Bolton Rd	Terre Haute	Vigo	IN	47885	125	2014	Coal	20, 2011)
				- Ŭ						EPA regs may force Duke to shut
										Indiana coal plant, Reuters (Sep.
Wabash River	6	450 Bolton Rd	Terre Haute	Vigo	IN	47885	387	2014	Coal	20, 2011)
										IPM Parsed Results - Policy Case
Lawrence Energy Center	3	1250 N 1800 Rd	Lawrence	Douglas	KS	66049	48	2015	Coal	(Toxics Rule)
										IPM Parsed Results - Policy Case
Riverton	39	7240 SE HWY 66	Riverton	Cherokee	ĸs	66730	38	2014	Coal	(Toxics Rule/Transport Rule)
	00		Riverton			00700	00	2014	ooui	IPM Parsed Results - Policy Case
										(Toxics Rule/Clean Air Transport
Riverton	40	7240 SE HWY 66	Riverton	Cherokee	ĸs	66730	54	2014	Coal	Rule)
Tecumseh Energy										IPM Parsed Results - Policy Case
Center	9	PO Box 38	Tecumseh	Shawnee	ĸs	66542	74	2015	Coal	(Toxics Rule)
										AEP Shares Plan For
										Compliance With Proposed EPA
										Regulations, Press Release
Big Sandy	2	22999 Hwy 23	Louisa	Louisa	KY	41230	438	12/31/2014	Coal	(June 9, 2011).
	1					1	1			The 2011 Joint Integrated
										Resource Plan of Louisville Gas
										and Electric Company and
		5252 Cane Run								Kentucky Utilities Compny (Apr.
Cane Run	1	Road	Louisville	Louisville	KY	40216	16	2016	Coal	21, 2011)

							Capacity	1	Fuel	
Plant Name	<u>Unit</u>	<u>Address</u>	City	<u>County</u>	<u>State</u>	Zip	(MW)	Year	Source	Citation
										The 2011 Joint Integrated
										Resource Plan of Louisville Gas
										and Electric Company and
		5252 Cane Run								Kentucky Utilities Compny (Apr.
Cane Run	2	Road	Louisville	Louisville	KY	40216	163	2016	Coal	21, 2011)
										The 2011 Joint Integrated
										Resource Plan of Louisville Gas
										and Electric Company and
		5252 Cane Run								Kentucky Utilities Compny (Apr.
Cane Run	3	Road	Louisville	Louisville	KY	40216	209	2016	Coal	21, 2011)
										The 2011 Joint Integrated
										Resource Plan of Louisville Gas
										and Electric Company and
		5252 Cane Run								Kentucky Utilities Compny (Apr.
Cane Run	4	Road	Louisville	Louisville	KY	40216	272	2016	Coal	21, 2011)
		5663 Highway 85								IPM Parsed Results - Policy Case
D B Wilson	W1	West	Centertown	Ohio	KY	42328	420	2015	Coke	(Toxics Rule)
										IPM Parsed Results - Policy Case
Dale	1	1925 Ford Road	Winchester	Clark	ΚY	40391	27	2014	Coal	(Transport Rule)
										IPM Parsed Results - Policy Case
Dale	2	1925 Ford Road	Winchester	Clark	ΚY	40391	27	2014	Coal	(Transport Rule)
										IPM Parsed Results - Policy Case
Dale	3	1925 Ford Road	Winchester	Clark	ΚY	40391	75	2014	Coal	(Transport Rule)
										IPM Parsed Results - Policy Case
Dale	4	1925 Ford Road	Winchester	Clark	KY	40391	75	2014	Coal	(Transport Rule)
										The 2011 Joint Integrated
										Resource Plan of Louisville Gas
										and Electric Company and
		811 Power Plant								Kentucky Utilities Compny (Apr.
Green River	1	Drive	Central City	Central City	KY	42330	75	2016	Coal	21, 2011)
										The 2011 Joint Integrated
										Resource Plan of Louisville Gas
										and Electric Company and
		811 Power Plant								Kentucky Utilities Compny (Apr.
Green River	2	Drive	Central City	Central City	KY	42330	114	2016	Coal	21, 2011)
										IDM Derend Deputte Deliev Core
Dohart A Daid	1	9000 Highway	Debarde	Wobster		10450	CE.	2014		IPM Parsed Results - Policy Case
Robert A Reid	1	2096	Robards	Webster	KY	42452	CO	2014	Coal	(Toxics Rule/Transport Rule)

Plant Name	<u>Unit</u>	Address	City	<u>County</u>	<u>State</u>	Zip	<u>Capacity</u> (MW)	Year	<u>Fuel</u> Source	Citation
Tyrone		6800 Tyrone Pike	Versailles	Versailles	KY	40383	135	2016		The 2011 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Compny (Apr. 21, 2011); IPM Parsed Results - Policy Case (Toxics Rule)
Nelson Industrial Steam and Operating Company	1A	3500 Houston River Rd.	Westlake	Calcasieu	LA	70669	107	2015	Petroleum Coke	IPM Parsed Results - Policy Case (Toxics Rule)
Nelson Industrial Steam and Operating Company	2A	3501 Houston River Rd. Brayton Point	Westlake	Calcasieu	LA	70669	106	2015	Coke	IPM Parsed Results - Policy Case (Toxics Rule) IPM Parsed Results - Policy Case
Brayton Point	3	Road Brayton Point	Somerset	Bristol	MA	02726	612	2015	Coal	(Toxics Rule) IPM Parsed Results - Policy Case
Brayton Point	4	Road	Somerset	Bristol	MA	02726	435	2014	Coal	(Transport Rule)
Salem Harbor	1	24 Fort Avenue	Salem	Salem	МА	01970	82	June, 2014		Dominion Sets Schedule to Close Salem Harbor Power Station, Press Release, May 11, 2011; IPM Parsed Results - Policy Case (Toxics Rule).
Salem Harbor	2	24 Fort Avenue	Salem	Salem	МА	01970	82	June, 2014		Dominion Sets Schedule to Close Salem Harbor Power Station, Press Release, May 11, 2011; IPM Parsed Results - Policy Case (Toxics Rule).
Salem Harbor	3	24 Fort Avenue	Salem	Salem	МА	01970	166	June, 2014		Dominion Sets Schedule to Close Salem Harbor Power Station, Press Release, May 11, 2011; IPM Parsed Results - Policy Case (Toxics Rule).
Salem Harbor	4	24 Fort Avenue	Salem	Salem	МА	01970	476	June, 2014		Dominion Sets Schedule to Close Salem Harbor Power Station, Press Release (May 11, 2011).
R. Paul Smith	11	PO Box 168	Williamsport	WASHINGTON	MD	21795	75	2015		FirstEnergy, Citing Impact of Environmental Regulations, Will Retire Six Coal-Fired Power Plants, Press Release (Jan 26, 2012)

							Capacity		Fuel	
Plant Name	<u>Unit</u>	<u>Address</u>	<u>City</u>	<u>County</u>	<u>State</u>	<u>Zip</u>	<u>(MW)</u>	Year	<u>Source</u>	<u>Citation</u>
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
R. Paul Smith	0	DO Dov 169	Williamonart			21705	24 E	2015	Coal	<i>Plants, Press Release</i> (Jan 26, 2012)
R. Paul Smith	9	PO Box 168	Williamsport	WASHINGTON	IVID	21795	34.5	2015	Coal	Michigan Utility To Scrap 'Clean-
										Coal' Plant, Shut Older Coal
										Units, Wall Street Journal (Dec.
B.C. Cobb	2	151 N. Causeway	Muskegon	Muskegon	MI	49445	156	2015	Coal	2, 2011)
2.0.0000	~	To The OddSeway	Musikegon	Musikegon		10110	100	2010	ooui	Michigan Utility To Scrap 'Clean-
										Coal' Plant, Shut Older Coal
										Units, Wall Street Journal (Dec.
B.C. Cobb	4	151 N. Causeway	Muskegon	Muskegon	МІ	49445	156	2015	Coal	2, 2011)
		,	0	Ŭ						Michigan Utility To Scrap 'Clean-
										Coal' Plant, Shut Older Coal
										Units, Wall Street Journal (Dec.
D.E. Karn	1	2742 N. Weadock H	Essexville	Bay	MI	48732	255	2015	Coal	2, 2011)
										Michigan Utility To Scrap 'Clean-
										Coal' Plant, Shut Older Coal
										Units, Wall Street Journal (Dec.
D.E. Karn	2	2742 N. Weadock H	Essexville	Bay	MI	48732	260	2015	Coal	2, 2011)
							10	~~ / -	<u> </u>	IPM Parsed Results - Policy Case
Eckert Station	1	601 Island Ave	Lansing	Ingham	MI	48910	40	2015	Coal	(Toxics Rule)
Ealvant Station	2	CO1 Jaland Ava			N 41	40040	40	2045	Caal	IPM Parsed Results - Policy Case
Eckert Station	2	601 Island Ave	Lansing	Ingham	MI	48910	42	2015	Coal	(Toxics Rule) IPM Parsed Results - Policy Case
Eckert Station	3	601 Island Ave	Longing	Ingham	МІ	48910	41	2015	Coal	(Toxics Rule)
	3	out Island Ave	Lansing	Ingham	1011	40910	41	2015	Cuai	IPM Parsed Results - Policy Case
Eckert Station	4	601 Island Ave	Lansing	Ingham	МІ	48910	69	2015	Coal	(Toxics Rule)
	-		Lanoing	Ingriam		40010	00	2010	oour	IPM Parsed Results - Policy Case
Eckert Station	5	601 Island Ave	Lansing	Ingham	MI	48910	69	2015	Coal	(Toxics Rule)
	•		g							IPM Parsed Results - Policy Case
Eckert Station	6	601 Island Ave	Lansing	Ingham	MI	48910	67	2015	Coal	(Toxics Rule)
				ž						IPM Parsed Results - Policy Case
										(Toxics Rule/Clean Air Transport
Endicott Station	1	720 Herring Road	Litchfield	Hillsdale	MI	49252	55	2014	Coal	Rule)
										Michigan Utility To Scrap 'Clean-
										Coal' Plant, Shut Older Coal
										Units, Wall Street Journal (Dec.
J.R. Whiting	1	4525 E. Erie Rd.	Erie	Monroe	MI	48133	106	2015	Coal	2, 2011)

Plant Name	Unit	Address	City	County	State	Zip	<u>Capacity</u> (MW)	Year	<u>Fuel</u> Source	Citation
										Michigan Utility To Scrap 'Clean-
										Coal' Plant, Shut Older Coal
										Units, Wall Street Journal (Dec.
J.R. Whiting	2	4525 E. Erie Rd.	Erie	Monroe	MI	48133	106	2015	Coal	2, 2011)
										Michigan Utility To Scrap 'Clean-
										Coal' Plant, Shut Older Coal
										Units, Wall Street Journal (Dec.
J.R. Whiting	3	4525 E. Erie Rd.	Erie	Monroe	MI	48133	133	2015	Coal	2, 2011)
										IPM Parsed Results - Policy Case
James De Young	5	64 Pine Ave.	Holland	Ottawa	МІ	49423	27	2014	Coal	(Toxics Rule/Transport Rule)
	-									Xcel's Power Pullback,
Black Dog	3	1400 Black Dog Ro	Burnsville	Dakota	MN	55101	114	2015	Coal	StarTribune (Dec. 1, 2011)
Ŭ		Ŭ						1		Xcel's Power Pullback,
Black Dog	4	1400 Black Dog Ro	Burnsville	Dakota	MN	55101	180	2015	Coal	StarTribune (Dec. 1, 2011)
		21499 E. Truman								IPM Parsed Results - Policy Case
Blue Valley	3	Rd.	Independence	Jackson	MO	64056	51	2014	Coal	(Transport Rule)
										IPM Parsed Results - Policy Case
Chamois	2	9321 Highway 100	Chamois	Osage	MO	65024	49	2014	Coal	(Toxics Rule/Transport Rule)
James River Power										IPM Parsed Results - Policy Case
Station	3	5701 S. Kissick	Springfield	Greene	MO	65804	41	2015	Coal	(Toxics Rule)
James River Power										IPM Parsed Results - Policy Case
Station	4		Springfield	Greene	MO	65804	56	2015	Coal	(Toxics Rule)
		1413 Lower Lake								IPM Parsed Results - Policy Case
Lake Road	6	Rd	St Joseph	Buchanan	MO	64504	97	2015	Coal	(Toxics Rule)
			.							The Ameren 2011 Integrated
Meramec	1	8200 Fine Rd	St. Louis	St. Louis	MO	63129	138	2015	Coal	Resource Plan
			o	o		00400	100	0015		The Ameren 2011 Integrated
Meramec	2	8200 Fine Rd	St. Louis	St. Louis	MO	63129	138	2015	Coal	Resource Plan
			Ot Lawia			00400	000	0045		The Ameren 2011 Integrated
Meramec	3	8200 Fine Rd	St. Louis	St. Louis	MO	63129	289	2015	Coal	Resource Plan
Maranaa		0000 Eine Del	Ct. Lauda			00400	250	0015	Cool	The Ameren 2011 Integrated
Meramec	4		St. Louis	St. Louis	MO	63129	359	2015	Coal	Resource Plan
Sibley	1	33200 E. Johnson	Sibley	laakaan		64000	E A	2014	Coal	IPM Parsed Results - Policy Case
Sibley	1	Rd 33200 E. Johnson	Sibley	Jackson	MO	64088	54	2014	Coal	(Transport Rule) IPM Parsed Results - Policy Case
Sibley	2	Rd	Sibley	Jackson	МО	64088	54	2014	Coal	(Transport Rule)
Sibley	2	18 Snider	Sibley	Jackson	UNU	04000	54	2014	Uai	IPM Parsed Results - Policy Case
Colstrip Energy LP	BLR1	Subdivision Road	Colstrip	Rosebud	мт	59323	35	2015	Coal	(Toxics Rule)
Colomp Energy Er		2215 N. Frontage	Colstrip			33323	55	2013		IPM Parsed Results - Policy Case
Yellowstone Energy LP	BLR1		Billings	Yellowstone	МТ	59101	28	2015	Coke	(Toxics Rule)
I ENOWSLONE ENERGY LP	DLKI	1.050	Billings	I EIIOWSIONE		29101	20	2015	COKE	

			0.1	0	<u>.</u>		Capacity		Fuel	
Plant Name	Unit	Address	<u>City</u>	<u>County</u>	State	Zip	<u>(MW)</u>	<u>Year</u>	Source	<u>Citation</u>
		2215 N. Frontage	D					0015		IPM Parsed Results - Policy Case
Yellowstone Energy LP	BLR2	Rosd	Billings	Yellowstone	MT	59101	28	2015	Coke	(Toxics Rule)
										IPM Parsed Results - Policy Case
Buck	5	1555 Dukeville Rd	Salisbury	Rowan	NC	28145	38	2014	Coal	(Toxics Rule/Transport Rule)
										IPM Parsed Results - Policy Case
Buck	6	1555 Dukeville Rd	Salisbury	Rowan	NC	28145	38	2014	Coal	(Toxics Rule/Transport Rule)
										IPM Parsed Results - Policy Case
Buck	7	1555 Dukeville Rd	Salisbury	Rowan	NC	28145	38	2014	Coal	(Toxics Rule/Transport Rule)
										Progress Energy Carolinas
										Integrated Resource Plan (Sep.
Cape Fear	5	500 CP&L Road	Moncure	Moncure	NC	27559	148	12/31/2014	Coal	13, 2010).
										Progress Energy Carolinas
										Integrated Resource Plan (Sep.
										13, 2010); IPM Parsed Results -
Cape Fear	6	500 CP&L Road	Moncure	Moncure	NC	27559	175	12/31/2014	Coal	Policy Case (Toxics Rule).
·		175 Steamplant								IPM Parsed Results - Policy Case
Riverbend	7	Rd	Mount Holly	Gaston	NC	28120	94	2015	Coal	(Toxics Rule)
		175 Steamplant								IPM Parsed Results - Policy Case
Riverbend	8	Rd	Mount Holly	Gaston	NC	28120	94	2015	Coal	(Toxics Rule)
			· · · ·							Progress Energy Carolinas
		491 Power Plant								Integrated Resource Plan (Sep.
Weatherspoon	1	Road	Lumberton	Robeson	NC	28358	49	12/31/2014	Coal	13, 2010).
•										Progress Energy Carolinas
		491 Power Plant								Integrated Resource Plan (Sep.
Weatherspoon	2	Road	Lumberton	Robeson	NC	28358	49	12/31/2014	Coal	13, 2010).
· · · ·										Progress Energy Carolinas
		491 Power Plant								Integrated Resource Plan (Sep.
Weatherspoon	3	Road	Lumberton	Robeson	NC	28358	79	12/31/2014	Coal	13, 2010).
	-				_		-			IPM Parsed Results - Policy Case
Schiller	4	400 Gosling Rd.	Portsmouth	Rockingham	NH	03801	48	2015	Coal	(Toxics Rule)
		373 North								IPM Parsed Results - Policy Case
Deepwater		Broadway	Pennsville	Salem	NJ	08070	80	2015	Coal	(Toxics Rule)
	-				1.13	50010				Navajo-area coal plants weigh
		End of County Rd								impact of EPA rules, <i>AP</i> (Dec.
Four Corners		,	Fruitland	San Juan	NM	87416	190	2015	Coal	19, 2011)
	1					5. 110	1.00			Navajo-area coal plants weigh
		End of County Rd								impact of EPA rules, AP (Dec.
Four Corners			Fruitland	San Juan	NM	87416	190	2015		19, 2011)
	۷	0010		Jan Juan		01410	190	2013	Ulai	13, 2011)

							Capacity		Fuel	
Plant Name	<u>Unit</u>	Address	<u>City</u>	County	State	Zip	(MW)	Year	Source	<u>Citation</u>
										Navajo-area coal plants weigh
		End of County Rd								impact of EPA rules, AP (Dec.
Four Corners	3	6675	Fruitland	San Juan	NM	87416	253	2015	Coal	19, 2011)
			Glenwood						Natural	IPM Parsed Results - Policy Case
Glenwood	40	Shore Road	Landing	Nassau	NY	11547	117	2015	Gas	(Toxics Rule)
			Glenwood						Natural	IPM Parsed Results - Policy Case
Glenwood	50	Shore Road	Landing	Nassau	NY	11547	122	2015	Gas	(Toxics Rule)
									Natural	
									Gas,	
									Residual	IPM Parsed Results - Policy Case
Port Jefferson	3	Beach Street	Port Jefferson	Suffolk	NY	11777	185	2015	Fuel Oil	(Toxics Rule)
		5300 Frontier								IPM Parsed Results - Policy Case
WPS Power Niagara	1	Avenue	Niagara Falls	Niagara	NY	14302	53	2015	Coal	(Toxics Rule)
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Ashtubula	5	2133 Lake Road	Ashtabula Towns	Ashtabula	ОН	44004	256	2015	Coal	2012)
										IPM Parsed Results - Policy Case
Avon Lake	10	33569	Avon Lake	Lorain	ОН	44012	93	2014	Coal	(Clean Air Transport Rule)
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Bay Shore	2	4701 Bay Shore Ro	Oregon	Lucas	ОН	43616	140.6	2015	Coal	2012)
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Bay Shore	3	4701 Bay Shore Ro	Oregon	Lucas	ОН	43616	140.6	2015	Coal	2012)
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Bay Shore	4	4701 Bay Shore Ro	Oregon	Lucas	ОН	43616	217.6	2015	Coal	2012)
	1	-								AEP Shares Plan For
										Compliance With Proposed EPA
										Regulations, Press Release
Conesville	3	47201 CR 273	Conesville	Conesville	ОН	43811	165	12/31/2014	Coal	(June 9, 2011).

							Capacity		Fuel	
Plant Name	Unit	Address	City	County	State	Zip	(MW)	Year	Source	Citation
							/-			FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Eastlake	1	10 Erie Road	Eastlake	Lake	ОН	44095	123	2015	Coal	2012)
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Eastlake	2	10 Erie Road	Eastlake	Lake	OH	44095	123	2015	Coal	2012)
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
				Lalva		44005	400	0045	0	Plants, Press Release (Jan 26,
Eastlake	3	10 Erie Road	Eastlake	Lake	ОН	44095	123	2015	Coal	2012) FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Eastlake	4	10 Erie Road	Eastlake	Lake	он	44095	208	2015	Coal	2012)
			Edolario	Lano		11000	200	2010	o dai	FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Eastlake	5	10 Erie Road	Eastlake	Lake	ОН	44095	680	2015	Coal	2012)
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Eastlake	6	10 Erie Road	Eastlake	Lake	OH	44095	32	2015	Coal	2012)
									Natural	
									Gas,	
Llewilten		000 NL 0#- 04		Dutler		45044	22	2014	Residual	IPM Parsed Results - Policy Case
Hamilton	8	960 N. 3rd Street	Hamilton	Butler	ОН	45011	33	2014	Fuel Oil	(Transport Rule). FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Lake Shore	18	6800 S Marginal Dr	Cleveland	Cuyahoga	он	44103	256	2015	Coal	2012)
Lake Shule	10	0000 S Marginal DI		ouyanoya		44103	200	2013	Ulai	2012)

							Capacity		Fuel	
Plant Name	<u>Unit</u>	<u>Address</u>	<u>City</u>	<u>County</u>	<u>State</u>	Zip	<u>(MW)</u>	<u>Year</u>	<u>Source</u>	Citation
										FirstEnergy, Citing Impact of Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Lake Shore	IC1	6800 S Marginal Dr	Cleveland	Cuyahoga	ОН	44103	2	2015	Coal	2012)
		ginai gi		e a janega	••••					FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Lake Shore	IC2	6800 S Marginal Dr	Cleveland	Cuyahoga	OH	44103	2	2015	Coal	2012)
										The Duke Energy Kentucky 2011
		PO Box 128		Miami	<u></u>	15100	4.00		o 1	Integrated Resource Plan (July 1,
Miami Fort	6	Brower Rd	North Bend	Township	ОН	45100	163	1/1/2015	Coal	2011). AEP Shares Plan For
										Compliance With Proposed EPA
										Regulations, Press Release
										(June 9, 2011); IPM Parsed
										Results - Policy Case (Toxics
Muskingum River	1	County Road 32	Beverly	Beverly	он	45715	220	12/31/2014	Coal	Rule)
Ŭ										AEP Shares Plan For
										Compliance With Proposed EPA
										Regulations, Press Release
										(June 9, 2011); IPM Parsed
			. .		<u></u>				<u> </u>	Results - Policy Case (Toxics
Muskingum River	2	County Road 32	Beverly	Beverly	ОН	45715	220	12/31/2014	Coal	Rule) AEP Shares Plan For
										Compliance With Proposed EPA Regulations, Press Release
Muskingum River	3	County Road 32	Beverly	Beverly	он	45715	238	12/31/2014	Coal	(June 9, 2011)
	0		Dovony	Devely	011	107.10	200	12/01/2011	ooui	AEP Shares Plan For
										Compliance With Proposed EPA
										Regulations, Press Release
Muskingum River	4	County Road 32	Beverly	Beverly	ОН	45715	238	12/31/2014	Coal	(June 9, 2011)
		1047 Dalmant								IDM Deread Deputts - Delias Const
Niles		1047 Belmont Avenue	Niles	Trumbull	он	44446	111	2015	Coal	IPM Parsed Results - Policy Case (Toxics Rule/Transport Rule)
	2	Avenue	INITES			44440	111	2013	Udi	AEP Shares Plan For
										Compliance With Proposed EPA
										Regulations, Press Release
										(June 9, 2011); IPM Parsed
										Results - Policy Case (Toxics
Picway		US 23	Lockbourne	Lockbourne	ОН	43137	100	12/31/2014		Rule)

							Capacity		Fuel	
Plant Name	<u>Unit</u>	Address	City	County	<u>State</u>	Zip	<u>(MW)</u>	Year	<u>Source</u>	<u>Citation</u>
		57246 Ferry								IPM Parsed Results - Policy Case
R E Burger	5	Landing Road	Shadyside	Belmont	OH	43947	47	2014	Coal	(Transport Rule)
		57246 Ferry								IPM Parsed Results - Policy Case
R E Burger	6	Landing Road	Shadyside	Belmont	OH	43947	47	2014	Coal	(Transport Rule)
										The Duke Energy Ohio 2011
										Integrated Resource Plan (July
										15, 2011); IPM Parsed Results -
WC Beckjord	1	757 US Rt 52	New Richmond	Clermont	OH	45200	115	1/1/2015	Coal	Policy Case (Toxics Rule)
										The Duke Energy Ohio 2011
										Integrated Resource Plan (July
										15, 2011); IPM Parsed Results -
WC Beckjord	2	757 US Rt 52	New Richmond	New Richmond	OH	45200	113	1/1/2015	Coal	Policy Case (Toxics Rule)
										The Duke Energy Ohio 2011
										Integrated Resource Plan (July
										15, 2011); IPM Parsed Results -
WC Beckjord	3	757 US Rt 52	New Richmond	Clermont	ОН	45200	125	1/1/2015	Coal	Policy Case (Toxics Rule)
										The Duke Energy Ohio 2011
										Integrated Resource Plan (July
										15, 2011); IPM Parsed Results -
WC Beckjord	4	757 US Rt 52	New Richmond	New Richmond	ОН	45200	163	1/1/2015	Coal	Policy Case (Toxics Rule)
										The Duke Energy Ohio 2011
										Integrated Resource Plan (July
										15, 2011); IPM Parsed Results -
WC Beckjord	5	757 US Rt 52	New Richmond	Clermont	ОН	45200	245	1/1/2015	Coal	Policy Case (Toxics Rule)
										The Duke Energy Ohio 2011
										Integrated Resource Plan (July
										15, 2011); IPM Parsed Results -
WC Beckjord	6	757 US Rt 52	New Richmond	New Richmond	ОН	45200	461	1/1/2015	Coal	Policy Case (Toxics Rule)
		700 NE 7TH							Natural	IPM Parsed Results - Policy Case
Anadarko Plant	3	STREET	Anadarko	Caddo	OK	73005	44	2015	Gas	(Toxics Rule)
		501 Mustang Plant							Natural	IPM Parsed Results - Policy Case
Mustang	1	Rd.	Oklahoma City	Canadian	OK	73127	53	2015	Gas	(Toxics Rule)
		501 Mustang Plant							Natural	IPM Parsed Results - Policy Case
Mustang	2	Rd.	Oklahoma City	Canadian	OK	73127	53	2015	Gas	(Toxics Rule)
		501 Mustang Plant							Natural	IPM Parsed Results - Policy Case
Mustang	3	Rd.	Oklahoma City	Canadian	OK	73127	118	2015	Gas	(Toxics Rule)
		501 Mustang Plant							Natural	IPM Parsed Results - Policy Case
Mustang	4	Rd.	Oklahoma City	Canadian	ОК	73127	250	2015	Gas	(Toxics Rule)
-						1	1			Portland Gas and Electric
								Not		Comments on EPA NESHAP
Boardman		73334 Tower Rd	Boardman	Boardman	OR	97818	601	Available	Coal	Action (Aug. 2, 2011)

Plant Name	<u>Unit</u>	Address	City	County	State	Zin	Capacity (MW)	Year	<u>Fuel</u> Source	Citation
	<u>orm</u>	<u>riddrood</u>	<u>ony</u>	County	otato			1001	000100	FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
										Plants, Press Release (Jan 26,
Armstrong	1	108 Power Plant Ro	Adrian	Armstrong	PA	16210	163.2	2015	Coal	2012)
										FirstEnergy, Citing Impact of
										Environmental Regulations, Will
										Retire Six Coal-Fired Power
Armstrong	2	108 Power Plant Ro	Adrian	Armstrong	PA	16210	163.2	2015	Coal	<i>Plants, Press Release</i> (Jan 26, 2012)
G F Weaton Power	2	300 Frankfort	Aunan	Annstrong		10210	105.2	2013	Cuai	IPM Parsed Results - Policy Case
Station	1		Monaca	Beaver	PA	15061	56	2015	Coal	(Toxics Rule)
G F Weaton Power	•	300 Frankfort	monada	Douro		10001		2010	e ca.	IPM Parsed Results - Policy Case
Station	2		Monaca	Beaver	PA	15061	56	2015	Coal	(Toxics Rule)
		2189 St. Rt. 168								IPM Parsed Results - Policy Case
New Castle	3		West Pittsburg	Lawrence	PA	16160	95	2014	Coal	(Transport Rule)
		2189 St. Rt. 168								IPM Parsed Results - Policy Case
New Castle	5	South	West Pittsburg	Lawrence	PA	16160	138	2014	Coal	(Transport Rule)
		250 Dower Diant								IDM Dereed Desults Delieu Case
Shawville	1	250 Power Plant Drive	Shawville	Clearfield	PA	16873	122	2014	Coal	IPM Parsed Results - Policy Case (Toxics Rule/Transport Rule)
Shawville	1	N. Old Trail Road,	Snawville	Cleanleiu	FA	10073	122	2014	Cuai	IPM Parsed Results - Policy Case
Sunbury Generation LP	2A	,	Shamokin Dam	Snyder	PA	17876	40	2014	Coal	(Transport Rule)
		N. Old Trail Road,							• • • •	IPM Parsed Results - Policy Case
Sunbury Generation LP	2B	,	Shamokin Dam	Snyder	PA	17876	40	2014	Coal	(Transport Rule)
	_	N. Old Trail Road,	a						. .	IPM Parsed Results - Policy Case
Sunbury Generation LP	3	PO Box 517	Shamokin Dam	Snyder	PA	17876	94	2014	Coal	(Toxics Rule/Transport Rule)
		N. Old Trail Road,								IPM Parsed Results - Policy Case
Sunbury Generation LP	4	'	Shamokin Dam	Snyder	PA	17876	128	2014	Coal	(Toxics Rule/Transport Rule)
Cullbury Conclation El	-	13139 Augusta				17070	120	2014	Obai	IPM Parsed Results - Policy Case
Canadys Steam	1		Walterboro	Colleton	SC	29433	105	2015	Coal	(Toxics Rule)
	-	Hwy 70 S PO Box								IPM Parsed Results - Policy Case
John Sevier	4	2000	Rogersville	Hawkins	ΤN	37857	176	2014	Coal	(Transport Rule)
		Hwy 70 PO Box	New							IPM Parsed Results - Policy Case
Johnsonville	1	259	Johnsonville	Humphreys	ΤN	37134	106	2014	Coal	(Transport Rule)
laha sa sila	10	Hwy 70 PO Box	New			07404		004.4		IPM Parsed Results - Policy Case
Johnsonville	10	259	Johnsonville	Humphreys	TN	37134	141	2014	Coal	(Toxics Rule/Transport Rule)
Johnsonville	2	Hwy 70 PO Box 259	New Johnsonville	Humphreys	ΤN	37134	106	2014	Coal	IPM Parsed Results - Policy Case (Transport Rule)
JOHHSOHVIIIE	2	209	JOHNSONNIIE	папрпеуз		5/134	100	2014	Ulai	

							Capacity		Fuel	
Plant Name	<u>Unit</u>	<u>Address</u>	<u>City</u>	<u>County</u>	State	Zip	<u>(MW)</u>	Year	<u>Source</u>	Citation
		Hwy 70 PO Box	New							IPM Parsed Results - Policy Case
Johnsonville		259	Johnsonville	Humphreys	ΤN	37134	106	2014	Coal	(Transport Rule)
		Hwy 70 PO Box	New			07404	400	0044		IPM Parsed Results - Policy Case
Johnsonville	4	259	Johnsonville	Humphreys	ΤN	37134	106	2014	Coal	(Transport Rule)
			Nam							IDM Davas d Dassilta - Daliau Casa
laha any illa		Hwy 70 PO Box	New Johnsonville			07404	100	2014		IPM Parsed Results - Policy Case
Johnsonville	5	259	Johnsonville	Humphreys	ΤN	37134	106	2014	Coal	(Toxics Rule/Transport Rule)
		Hwy 70 PO Box	New							IPM Parsed Results - Policy Case
Johnsonville			-	Humphrovo	ΤN	37134	106	2014	Coal	,
Johnsonville	6	259	Johnsonville	Humphreys	TIN	37134	106	2014	Coal	(Toxics Rule/Transport Rule)
		Hwy 70 PO Box	New							IPM Parsed Results - Policy Case
Johnsonville		259	Johnsonville	Humphreys	ΤN	37134	141	2014	Coal	(Toxics Rule/Transport Rule)
Johnsonville	1	209	Johnsonville	пипрпеуs	IIN	37134	141	2014	Coar	
		Hwy 70 PO Box	New							IPM Parsed Results - Policy Case
Johnsonville		259	Johnsonville	Humphreys	ΤN	37134	141	2014	Coal	(Toxics Rule/Transport Rule)
Johnsonville	0	209	JOHNSONVINE	пипрпеуз	IIN	37134	141	2014	Cuai	
		Hwy 70 PO Box	New							IPM Parsed Results - Policy Case
Johnsonville		259	Johnsonville	Humphreys	ΤN	37134	141	2014		(Toxics Rule/Transport Rule)
		701 Light	Johnsonvinc	riumpineys	111	57 154	141	2014		IPM Parsed Results - Policy Case
AES Deepwater		Company Road	Pasadena	Harris	тх	77506	139	2015		(Toxics Rule)
	01					11000	100	2013		IPM Parsed Results - Policy Case
ERCT_TX_Coal steam	1	n/a	n/a	n/a	тх	n/a	300	2015		(Toxics Rule)
		11/4	11/4	174	17	11/4	000	2010	Natural	
									Gas,	
										IPM Parsed Results - Policy Case
Lone Star	1	Hwy 259 South	Lone Star	Morris	тх	75668	50	2014	Fuel Oil	(Toxics Rule/Transport Rule)
	ľ	1111 200 00001			17	10000	00	2011		Luminant Announces Facility
										Closures, Job Reductions in
										Response to EPA Rule, Luminant
Monticello	1	PO Box 1266	Mount Pleasant	Titus	тх	75455	593	2012	Coal	(Sep. 12, 2011)
		1 0 000 1200	Mount ricasant	Thus		70400	000	2012	000	Luminant Announces Facility
										Closures, Job Reductions in
										Response to EPA Rule, Luminant
Monticello	2	PO Box 1267	Mount Pleasant	Titus	тх	75455	593	2012	Coal	(Sep. 12, 2011)
	F					. 0 /00				
		5m SW os Sunray,							Natural	IPM Parsed Results - Policy Case
Moore County		FM Rd 119	Sunray	Moore	тх	79170	48	2015		(Toxics Rule)
	ľ –									IPM Parsed Results - Policy Case
San Miguel	SM-1	6200 FM 3387	Christine	Atascosa	тх	78012	301	2015	Coal	(Toxics Rule)

							Capacity		Fuel	
Plant Name	Unit	Address	City	<u>County</u>	<u>State</u>	Zip	<u>(MW)</u>	Year	<u>Source</u>	Citation
										AEP Shares Plan For
										Compliance With Proposed EPA
										Regulations, Press Release
Welsh	2	FM Rd 1735	Pittsburg	Pittsburg	ΤX	75686	528	12/31/2014	Coal	(June 9, 2011)
		Hwy 6 & Hwy 91,								IPM Parsed Results - Policy Case
Carbon	1	12 mi N Price	Price	Carbon	UT	84526	67	2015	Coal	(Toxics Rule)
		9200 West 3325								IPM Parsed Results - Policy Case
KUCC	1	South	Magna	Salt Lake	UT	84044	30	2015	Coal	(Toxics Rule)
		9200 West 3325								IPM Parsed Results - Policy Case
KUCC	2	South	Magna	Salt Lake	UT	84044	30	2015	Coal	(Toxics Rule)
		9200 West 3325								IPM Parsed Results - Policy Case
KUCC	3	South	Magna	Salt Lake	UT	84044	30	2015	Coal	(Toxics Rule)
Sunnyside Cogen		#1 Power Plant								IPM Parsed Results - Policy Case
Associates	1	Road	Sunnyside	Carbon	UT	84539	51	2015	Coal	(Toxics Rule)
Chesapeake	1	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	19	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).
Chesapeake	2	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	16	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).
Chesapeake Chesapeake	4	2701 VEPCO St 2701 VEPCO St	Chesapeake	Chesapeake (city) Chesapeake (city)	VA	23323	16	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011). IPM Parsed Results - Policy Case (Toxics Rule)
Chesapeake	3	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA		185	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022 , Daily Press (Sep. 1, 2011).
Chesapeake	6	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	16	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).

Plant Name	<u>Unit</u>	Address	<u>City</u>	<u>County</u>	State	<u>Zip</u>	<u>Capacity</u> (MW)	Year	<u>Fuel</u> Source	<u>Citation</u>
Chesapeake	7	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	24	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).
Chesapeake	8	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	24	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).
Chesapeake	9	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	24	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).
Chesapeake	ST1	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	113	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).
Chesapeake	ST2	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	113	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022 , Daily Press (Sep. 1, 2011).
Chesapeake	ST4	2701 VEPCO St	Chesapeake	Chesapeake (city)	VA	23323	239	2016	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).
Clinch River	3	State Route 82	Cleveland	Cleveland	VA	24225	235	12/31/2014	Coal	AEP Shares Plan For Compliance With Proposed EPA Regulations, Press Release (June 9, 2011) AEP Shares Plan For
Glen Lyn	1	U.S Route 460	Glen Lyn	Giles	VA	24093	100	12/31/2014	Coal	Compliance With Proposed EPA Regulations, Press Release (June 9, 2011). AEP Shares Plan For
Glen Lyn	2	U.S Route 460	Glen Lyn	Giles	VA	24093	238	12/31/2014	Coal	Compliance With Proposed EPA Regulations, Press Release (June 9, 2011).

Plant Name	<u>Unit</u>	Address	City	County	State	Zip	<u>Capacity</u> (MW)	Year	<u>Fuel</u> Source	Citation
			<u></u>				<u>()</u>			IPM Parsed Results - Policy Case
Glen Lyn	51	U.S Route 460	Glen Lyn	Giles	VA	24093	45	2015	Coal	(Toxics Rule)
										IPM Parsed Results - Policy Case
Glen Lyn	52	U.S Route 460	Glen Lyn	Giles	VA	24093	45	2015	Coal	(Toxics Rule)
Potomac River	1	1400 Royal St.	Alexandria	Alexandria (city)	VA	22314	88	2015	Coal	Alexandria coal plant may shut by 2012, Washington Post (Aug. 30, 2011); IPM Parsed Results - Policy Case (Transport Rule)
Potomac River	2	1400 Royal St.	Alexandria	Alexandria (city)	VA	22314	88	2015	Coal	<i>Alexandria coal plant may shut by 2012,</i> Washington Post (Aug. 30, 2011)
Potomac River	3	1400 Royal St.	Alexandria	Alexandria	VA	22314	110	2015	Coal	<i>Alexandria coal plant may shut by 2012,</i> Washington Post (Aug. 30, 2011)
Potomac River	4	1400 Royal St.	Alexandria	Alexandria	VA	22314		2015	Coal	Alexandria coal plant may shut by 2012, Washington Post (Aug. 30, 2011)
Potomac River	5	1400 Royal St.	Alexandria	Alexandria	VA	22314	110	2015	Coal	Alexandria coal plant may shut by 2012, Washington Post (Aug. 30, 2011)
Yorktown	1	1600 Waterview Road	Yorktown	York	VA	23690	188	2015	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022, Daily Press (Sep. 1, 2011).
Yorktown	2	1600 Waterview Road	Yorktown	York	VA	23690	188	2015	Coal	Dominion plans to shutter Yorktown and Chesapeake power plants between 2015 and 2022 , Daily Press (Sep. 1, 2011).
										Dairyland to shutter three Alma
	4	4400 0 14-1-	A	Duffele		E 4040	45	2012	Casl	coal units, LaCrosse Tribune
Alma		1420 S. Main	Alma	Buffalo	WI	54610	15	2012	Coal	(Dec. 7, 2011) Dairyland to shutter three Alma
Alma	2	1420 S. Main	Alma	Buffalo	WI	54610	15	2012	Coal	coal units, <i>LaCrosse Tribune</i> (<i>Dec. 7, 2011</i>) Dairyland to shutter three Alma
Alma	3	1420 S. Main	Alma	Buffalo	WI	54610	15	2012	Coal	coal units, <i>LaCrosse Tribune</i> (Dec. 7, 2011)
Blount Street	8	715 E. Main Street	Madison	Dane	WI	64056	49	2015	Coal	IPM Parsed Results - Policy Case (Toxics Rule)

							Capacity		Fuel	
Plant Name	<u>Unit</u>	<u>Address</u>	City	<u>County</u>	<u>State</u>	<u>Zip</u>	(MW)	Year	Source	Citation
										IPM Parsed Results - Policy Case
Blount Street		715 E. Main Street	Madison	Dane	WI	64056	48	2015	Coal	(Toxics Rule)
		11060 S. Chicago								IPM Parsed Results - Policy Case
South Oak Creek		Road	Oak Creek	Milwaukee	WI	53154	261	2015	Coal	(Toxics Rule)
		11060 S. Chicago								IPM Parsed Results - Policy Case
South Oak Creek	6	Road	Oak Creek	Milwaukee	WI	53154	264	2015	Coal	(Toxics Rule)
		1035 West Canal								IPM Parsed Results - Policy Case
Valley			Milwaukee	Milwaukee	WI	53233	70	2014	Coal	(Toxics Rule/Transport Rule)
Valley	•		Minwadilee	Milwaakee		00200	10	2014	ooui	
		1035 West Canal								IPM Parsed Results - Policy Case
Valley		Street	Milwaukee	Milwaukee	WI	53233	70	2014	Coal	(Toxics Rule/Transport Rule)
valicy	2		Milwadkee	Milwadkee		00200	10	2014	ooai	
		1035 West Canal								IPM Parsed Results - Policy Case
Valley		Street	Milwaukee	Milwaukee	WI	53233	70	2014	Coal	(Toxics Rule/Transport Rule)
valicy	0		Milwadkee	Milwadkee		00200	10	2014	ooai	
		1035 West Canal								IPM Parsed Results - Policy Case
Valley	4	Street	Milwaukee	Milwaukee	WI	53233	70	2014	Coal	(Toxics Rule/Transport Rule)
valicy	-		Milwadkee	Milwadkee		00200	10	2014	0001	AEP Shares Plan For
										Compliance With Proposed EPA
		W.Va. State Route								Regulations, Press Release
Kammer			Captina	Moundsville	WV	26041	238	12/31/2014	Coal	(June 9, 2011)
Rammen	1	2	Captina	Woundsville	~ ~ ~	20041	200	12/31/2014	Coal	AEP Shares Plan For
										Compliance With Proposed EPA
		W.Va. State Route								Regulations, Press Release
Kammer		2	Captina	Moundsville	WV	26041	238	12/31/2014	Cool	(June 9, 2011)
Rammer	3	2	Captina	NIUUIIUSVIIIE	VVV	20041	230	12/31/2014	Cuai	AEP Shares Plan For
										Compliance With Proposed EPA
		1201 Lumpkin								
Kommor		1301 Lumpkin	Oroville	Maundavilla	WV	30	238	12/31/2014	Cool	Regulations, Press Release
Kammer	2	Road	Oroville	Moundsville	VVV	30	230	12/31/2014	Coal	(June 9, 2011) AEP Shares Plan For
										Compliance With Proposed EPA
	4		Oleanau			05000	000	10/01/0011	0	Regulations, Press Release
Kanawha	1	U.S. Route 60	Glasgow	Glasgow	WV	25086	220	12/31/2014	Coal	(June 9, 2011)
										AEP Shares Plan For
										Compliance With Proposed EPA
						05000	000	40/04/004 :		Regulations, Press Release
Kanawha	2	U.S. Route 60	Glasgow	Glasgow	WV	25086	220	12/31/2014	Coal	(June 9, 2011)
								2011 (450		AEP Shares Plan For
								MW), Dec.		Compliance With Proposed EPA
								31, 2014		Regulations, Press Release
Phillip Sporn	1	State Route 62	Graham Station	New Haven	WV	25265	153	(600 MW)	Coal	(June 9, 2011).

						Capacity		Fuel	
Unit	<u>Address</u>	City	<u>County</u>	<u>State</u>	Zip	(MW)	Year	Source	Citation
							2011 (450		AEP Shares Plan For
							MW), Dec.		Compliance With Proposed EPA
							31, 2014		Regulations, Press Release
2	State Route 62	Graham Station	New Haven	WV	25265	153	(600 MW)	Coal	(June 9, 2011).
							2011 (450		AEP Shares Plan For
							MW), Dec.		Compliance With Proposed EPA
							31, 2014		Regulations, Press Release
3	State Route 62	Graham Station	New Haven	WV	25265	153	(600 MW)	Coal	(June 9, 2011).
							2011 (450		AEP Shares Plan For
							MW), Dec.		Compliance With Proposed EPA
							31, 2014		Regulations, Press Release
4	State Route 62	Graham Station	New Haven	WV	25265	153	(600 MW)	Coal	(June 9, 2011)
							2011 (450		AEP Shares Plan For
							MW), Dec.		Compliance With Proposed EPA
							31, 2014		Regulations, Press Release
5	State Route 62	Graham Station	New Haven	WV	25265	496	(600 MW)	Coal	(June 9, 2011)
									IDM Dereed Deculte Delieu Coos
7		Divoovillo	Marian		26500	46	2014	Cool	IPM Parsed Results - Policy Case
/	P.U.BUX 190	Rivesville	Wanon	VVV	20000	40	2014	Coal	(Toxics Rule/Transport Rule)
									IPM Parsed Results - Policy Case
Q	P O Box 100	Pivosvillo	Marian	M/17	26588	01	2014	Coal	(Toxics Rule/Transport Rule)
0	1.0.007 190			vvv	20300	51	2014	000	
	#2 Power Station								IPM Parsed Results - Policy Case
		Willow Island	Pleasants	WV	26134	54	2014	Coal	(Toxics Rule/Transport Rule)
	2 3 4 5 7	2 State Route 62 3 State Route 62 4 State Route 62 5 State Route 62 7 P.O.Box 190	2 State Route 62 Graham Station 3 State Route 62 Graham Station 4 State Route 62 Graham Station 4 State Route 62 Graham Station 5 State Route 62 Graham Station 7 P.O.Box 190 Rivesville 8 P.O.Box 190 Rivesville #2 Power Station #2 Power Station Image: Comparison of the station	2 State Route 62 Graham Station New Haven 3 State Route 62 Graham Station New Haven 4 State Route 62 Graham Station New Haven 4 State Route 62 Graham Station New Haven 5 State Route 62 Graham Station New Haven 5 State Route 62 Graham Station New Haven 7 P.O.Box 190 Rivesville Marion 8 P.O.Box 190 Rivesville Marion	2 State Route 62 Graham Station New Haven WV 3 State Route 62 Graham Station New Haven WV 4 State Route 62 Graham Station New Haven WV 5 State Route 62 Graham Station New Haven WV 5 State Route 62 Graham Station New Haven WV 7 P.O.Box 190 Rivesville Marion WV 8 P.O.Box 190 Rivesville Marion WV	2 State Route 62 Graham Station New Haven WV 25265 3 State Route 62 Graham Station New Haven WV 25265 4 State Route 62 Graham Station New Haven WV 25265 5 State Route 62 Graham Station New Haven WV 25265 5 State Route 62 Graham Station New Haven WV 25265 7 P.O.Box 190 Rivesville Marion WV 26588 8 P.O.Box 190 Rivesville Marion WV 26588 #2 Power Station Image: State Route Station Image: State Route Station Image: State Route Station Image: State Route Station	UnitAddressCityCountyStateZip(MW)2State Route 62Graham StationNew HavenWV252651533State Route 62Graham StationNew HavenWV252651534State Route 62Graham StationNew HavenWV252651535State Route 62Graham StationNew HavenWV252651535State Route 62Graham StationNew HavenWV252654965State Route 62Graham StationNew HavenWV252654967P.O.Box 190RivesvilleMarionWV26588468P.O.Box 190RivesvilleMarionWV2658891	UnitAddressCityCountyStateZip(MW)Year2State Route 62Graham StationNew HavenWV25265153(600 MW)2State Route 62Graham StationNew HavenWV25265153(600 MW)3State Route 62Graham StationNew HavenWV25265153(600 MW)3State Route 62Graham StationNew HavenWV25265153(600 MW)4State Route 62Graham StationNew HavenWV25265153(600 MW)4State Route 62Graham StationNew HavenWV25265153(600 MW)5State Route 62Graham StationNew HavenWV25265153(600 MW)600 MW)Graham StationNew HavenWV25265153(600 MW)5State Route 62Graham StationNew HavenWV25265496(600 MW)7P.O.Box 190RivesvilleMarionWV265884620148P.O.Box 190RivesvilleMarionWV26588912014	UnitAddressCityCountyStateZip(MW)YearSource2Image: State Route 62Graham StationNew HavenWV25265153(600 MW)Coal2State Route 62Graham StationNew HavenWV25265153(600 MW)Coal3State Route 62Graham StationNew HavenWV25265153(600 MW)Coal3State Route 62Graham StationNew HavenWV25265153(600 MW)Coal4State Route 62Graham StationNew HavenWV25265153(600 MW)Coal4State Route 62Graham StationNew HavenWV25265153(600 MW)Coal5State Route 62Graham StationNew HavenWV25265496(600 MW)Coal5State Route 62Graham StationNew HavenWV25265496(600 MW)Coal7P.O.Box 190RivesvilleMarionWV26588462014Coal8P.O.Box 190RivesvilleMarionWV26588912014Coal4P.O.Box 190RivesvilleMarionWV26588912014Coal

						Capacity		Fuel	
Plant Name	Unit	<u>Address</u>	<u>City</u>	<u>County</u>	State Zip	<u>(MW)</u>	Year	<u>Source</u>	<u>Citation</u>

Notes:

1. All retirements announced by plant owners result from EPA regulation. In each such case, the citation included directly identifies EPA regulations as the sole or main reason for the power plant's retirement.

2. Plant closures attributed to EPA modeling only include those plants that EPA projects to close as a result of EPA regulations. "Toxics Rule" results were found by removing plants listed on the Toxics Rule "IPM Parsed File - Base Case" (EPA-HQ-OAR-2009-0234-3032) from the "IPM Parsed File - Policy Case" (EPA-HQ-OAR-2009-0234-3033). "Transport Rule" results were found by removing plants listed on CATR "TR Base Case Final" from the CATR "TR Remedy Final" (both files available at: http://www.epa.gov/airmarkets/progsregs/epa-ipm/transport.html).

3. According to the EPA, the Toxics Rule base case includes the Transport Rule. Thus, theoretically, both the Toxics Rule Policy Case and Transport Rule Remedy Case (when controlled for their respective base cases) should not both independently identify closure of the same plant. Nevertheless, the list shows a 2 GW overlap between the two rules. This is, presumably, due to variance in the modeling platforms EPA utilized for both rules.

APPENDIX

POWER PLANT RETIREMENT LIST BACKGROUND INFORMATION

METHODOLOGY

LIST SOURCES

This list is derived from three sources: (1) EPA's parsed modeling files, which identify the power-plant units that EPA models say will close as a result of either the Clean Air Transport Rule (Transport Rule) or Utility MACT (Toxics Rule); (2) news releases or press stories where a power-plant operator says a unit will or is likely to close due to EPA regulations; and (3) filings with state public utility commissions where a power-plant operator says a unit will or EPA regulations. All sources are publically available information.

EPA PARSED FILES

Process to Identify Units Closed by EPA Regulation

Individual power-plants often have multiple boilers, called "units," that generate electricity. EPA, in addition to overall modeling, models the impact that the Agency believes its regulations will have on each unit, at each power-plant in America. EPA lists these results in "parsed files." When producing parsed files for a regulation, EPA will first create a business-as-usual "base" case parsed file where the Agency details what it believes will happen absent EPA's new regulation. Next, EPA creates a "policy" or "remedy" case parsed file showing how EPA believes plants will respond to a regulation. Thus, one can find the difference between these two cases, and figure out the impact EPA believes a regulation will have, by comparing the policy/remedy case parsed file to the base case parsed file. As such, the following steps were taken so that the list would only include those units EPA said would retire as a result of the Transport Rule and Toxics Rule:

- 1. For the Transport Rule, data from the parsed files for the Transport Rule's base case and remedy case were put on a single spreadsheet. The combined results were organized by plant name. Each plant listed in both the base case and remedy case was removed. Thus, the resulting list only shows those plants that EPA believes will close because of the Transport Rule.
- 2. For the Toxics Rule, data from the parsed files for the Toxics Rule's base case and policy case were put on a single spreadsheet. The combined results were organized by plant name. Each plant listed in both the base case and policy case was removed.

Thus, the resulting list only shows those plants that EPA believes will close because of the Toxics Rule.

3. The resulting base case-free Transport Rule list and Toxics Rule list were then put on a single spreadsheet. The combined results were organized by plant name. In each instance where the Transport Rule and the Toxics Rule independently said the same plant would retire, one of the entries was deleted so as to not double-count it. The citation was modified to attribute the unit closure to both the Transport Rule and Toxics Rule.

Transport Rule Parsed File

The parsed file for the Transport Rule is based on EPA's proposed Clean Air Transport Rule and not the final Cross State Air Pollution Rule (CSAPR). EPA has not yet made the CSAPR parsed files available to the public. However, given that the final CSAPR is more stringent than the rule's proposed version, it is likely that CSAPR's parsed file will show more unit closures than the parsed file used on this list.

POWER-PLANT OWNER PUBLIC ANNOUNCEMENTS

Ensuring that Retirements are Result of EPA Regulation

All retirements announced by plant owners in news releases or through public filings on this list were due to EPA regulation. In each such case, the source cited directly identifies EPA regulations as the sole or main reason for the power plant's retirement.

Avoiding Double-Counting

If a unit was identified to close by both EPA parsed files and public announcements, then the duplicate entry was released. The units citation was modified to indicate that both EPA and public announcements slated the unit for retirement.

FREQUENTLY ASKED QUESTIONS

Why is this list's total retired capacity higher than EPA's total?

The total retired capacity for this list is higher than EPA's total because this list includes EPA's projected unit retirements *and* unit retirements announced by power-plant operators. No unit cited by both sources was double counted.

Does this list include plants that will close even without the Transport Rule or Toxics Rule?

No. The parsed file results used in this list do not include business-as-usual base case results. In other words, if EPA modeled a unit to close even if the Transport Rule or Toxics Rule were not implemented, then that unit was not included.

EPA says only 9.9 GW will close, so why are these numbers higher?

The 9.9 GW retired coal-plant capacity figure is from the EPA Regulatory Impact Analysis (RIA) for the Toxics Rule alone. The Transport Rule RIA projects an additional 4.8 GW of coal-plant capacity to retire due to the Transport Rule. When combined, the RIA's project 13.8 GW of coal-plant capacity to retire due to the Toxics Rule and Transport Rule. As noted above, additional plant retirements are due to actually announced retirements.

Why do EPA's RIAs say the Transport and Toxics Rule will retire 13.8 GW of coalcapacity, while EPA's parsed files say the two rules will retire 14.5 GW?

EPA's overall modeling runs and parsed model use slightly different methods. Thus, the totals for the final results are slightly different, though very similar. The difference between the two totals is only .8 GW.

When a power-plant operator announces that it is closing a certain unit, how do you know that is because of EPA regulations?

In each case where a retirement is attributed to public announcements, the cited source material lists EPA regulations as the sole or main reason for the plant's retirement.

Some groups have said EPA regulations will retire 60 - 80 GW of coal-fired generation, but this list only shows 28 GW. Does this mean those projections are wrong?

No. If anything this list gives more credibility to those higher retirement projections. This list is very conservative; it merely shows what units EPA says its regulations will close, plus specific units that plant-operators have said will close because of EPA regulations. Those analyses that show higher power-plant retirements than this list lay out what the final overall impact of EPA's regulation will be. On the other hand, this list focuses just on the

currently disclosed impact. Plant-operators generally announce retirements only when required to by public filings. Thus, this list will likely grow far higher. However, because this list already finds twice as many retirements as EPA projected, the Agency's claim that its regulations will have minimal impact on electric generation are clearly incorrect.

EPA has said that other projections showing a high coal generation retirements were based on incorrect assumptions. Is that the case for this list?

No. The only modeling in this list is from EPA. Thus, any mistaken assumption would be EPA's mistaken assumption. Otherwise, the remaining data is from actual public announcements detailing the imminent or highly possible closure of specific units at specific power-plants.

The North American Electric Reliability Corporation (NERC) projected that most power-plants will retire because of EPA 316(b) cooling tower regulations. Does this list account for the fact that EPA has since indicated it will pursue less stringent 316(b) regulations?

This list only includes the parsed files for EPA's Transport Rule and Toxics Rule modeling. EPA's modeling for the 316(b) is not included. Public unit retirement announcements largely cited the Transport Rule and Toxics Rule as causing a unit to retire; there is little discussion of 316(b) regulations. This is likely due to the fact that EPA ultimately chose to pursue less stringent cooling tower rules than the Agency originally insinuated. Regardless, all of the publically announced plant retirements listed are retiring due to EPA regulations.

This list compares its total numbers to NERC's worst case analysis. Does that include NERC's analysis of 316(b) regulations?

No. The NERC analysis was broken down between the Transport Rule, the Toxics Rule and 316(b) regulations. The chart compares the list only to the NERC Transport Rule and Toxic Rule "strict," or worst case, scenarios.