



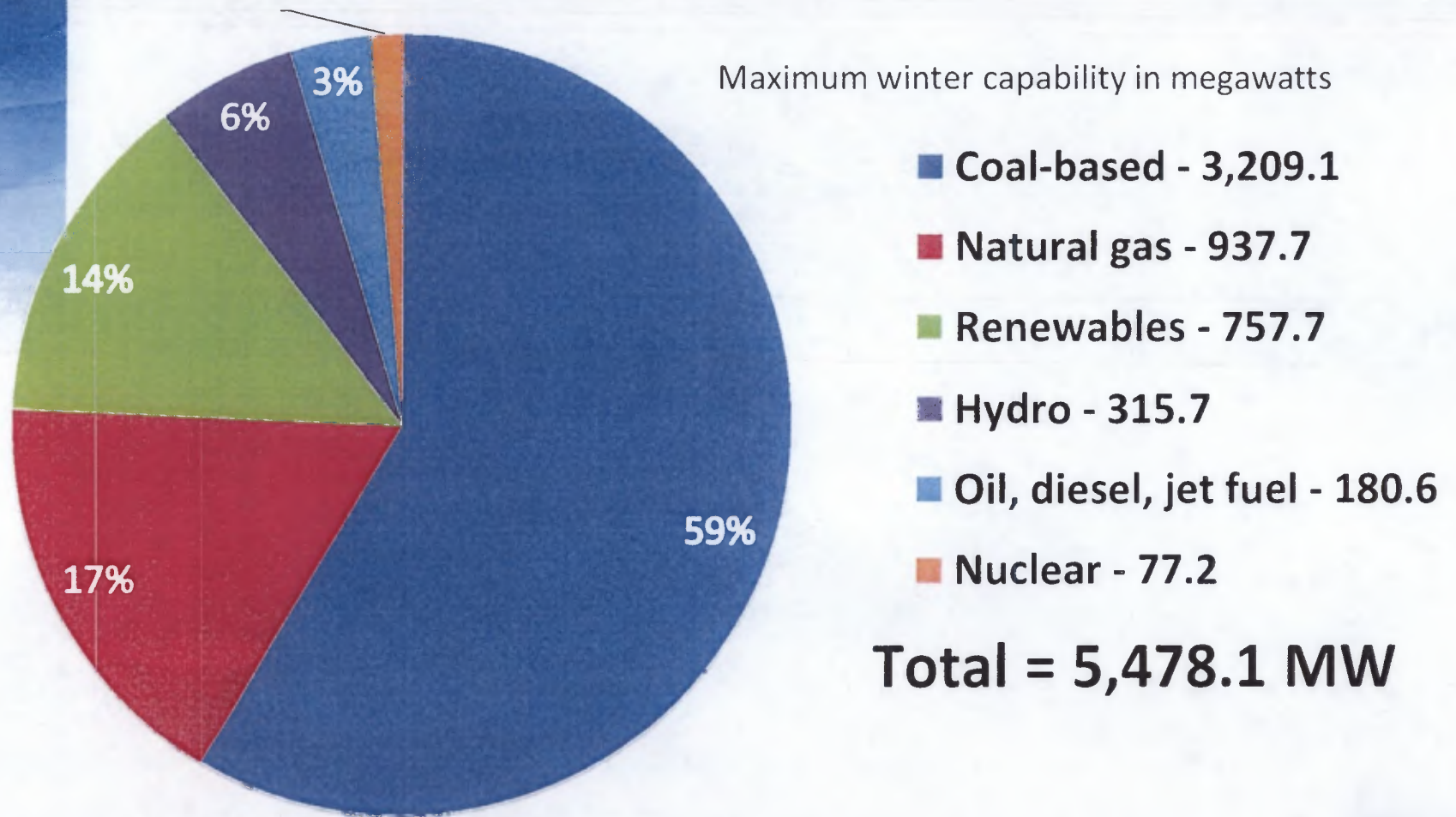
**BASIN ELECTRIC  
POWER COOPERATIVE**

A Touchstone Energy® Cooperative 


# EPA 111(d)

July 2014

# 2014 EOY Generation Capacity



Basin Electric's resource portfolio consists of generation in megawatts (winter ratings) from owned facilities and purchased power contracts longer than three years. The renewables percentage includes wind, recovered energy generation and biogas/flaregas totals.



# Basin Electric Internal Actions

- Internal Task Force assembled
- Questions
  - How would we develop a state-by-state plan?
  - How would we develop a multi state plan?
  - How would we develop a utility plan?
- Task Force will develop comments for public hearings and October for both rules
- Investigate legal options

# Basin Position

1. Support multi-state and utility compliance options to provide maximum flexibility for utilities that serve in multiple states
  - This is just the proposed rule, not final.
  - What happens after 2030?
  - Strength in numbers from a compliance and legal position.

# Basin Position

2. EPA should ensure energy efficiency improvements should not trigger New Source Review
  - Slight improvement may be possible (1%-2%).
  - 6% improvements will require significant modifications.
  - Major modifications may trigger NSR

# Basin Position

3. Any project that reduces CO<sub>2</sub> emissions should be allowed for compliance.
  - Reductions must be verifiable and measurable.
  - No provisions currently allowed for DGC sequestration.



## Basin View

4. EPA should reconsider its 70 percent capacity factor for re-dispatched natural gas
  - May be “technically” possible
  - May reduce coal plant efficiencies that EPA wants increased
  - May violate existing permits

# Basin View

## 5. Renewable Energy Credits clarification.

- Do REC's (or Green Tags) stay with the generating state or follow load?
- Law and proposed rule unclear regarding who has authority to designate and manage