

Analysis of DOE Proposal

Eligible Resources (2016)¹	
Total Capacity	93 GW
Coal Capacity	49 GW
Nuclear Capacity	44 GW
Total Generation	540,000 GWh
Total Operating and Maintenance Costs	14,500 \$ million
Total Fuel Costs	6,700 \$ million
Total Fixed Costs	6,000 \$ million
Total Non-Fuel Variable Costs	1,800 \$ million

¹ Using SNL Energy based on 2016 data for eligible resources, which includes merchant coal and nuclear units in Commission-approved regional transmission organizations and independent system operators with energy and capacity markets (interpreted to include PJM, ISO-NE, NYISO, MISO). Numbers are rounded and may not sum up exactly. See also Public Interest Organizations comments

	Impacts of Increased Coal Utilization²			
	2016 Utilization	Increased Utilization	CO ₂ Emissions Increase	Net Incremental CO ₂ Emissions Increase
Total Eligible Capacity (GW)	49	49	140 million tons	70 million tons ⁵
Capacity Factor	46% ³	75% ⁴		
Generation (GWh)	200,000	325,000		
Carbon Dioxide (CO ₂) Emissions (million tons)	220	360		

² Using SNL Energy based on 2016 data for eligible coal resources, which include merchant coal units in Commission-approved regional transmission organizations and independent system operators with energy and capacity markets (interpreted to include PJM, ISO-NE, NYISO, MISO). Numbers are rounded and may not sum up exactly. See also Public Interest Organizations comments

³ Represents the average capacity utilization of eligible coal units in 2016 based on SNL Energy data

⁴ 75% capacity utilization is used to illustrate one scenario of increased coal utilization. 75% utilization is consistent with the equivalent availability factor reported by PJM for steam turbines in 2016. See State of the Market Report for PJM, Volume 2: Detailed Analysis, Monitoring Analytics, LLC (2016) at 252

⁵ Assumes that the increased coal generation displaces natural gas generation on the margin and the emission rate of natural gas is roughly half that of coal