

# **Recommendations for Legislative Actions to Reduce Carbon Emissions in the Electricity Production Sector**

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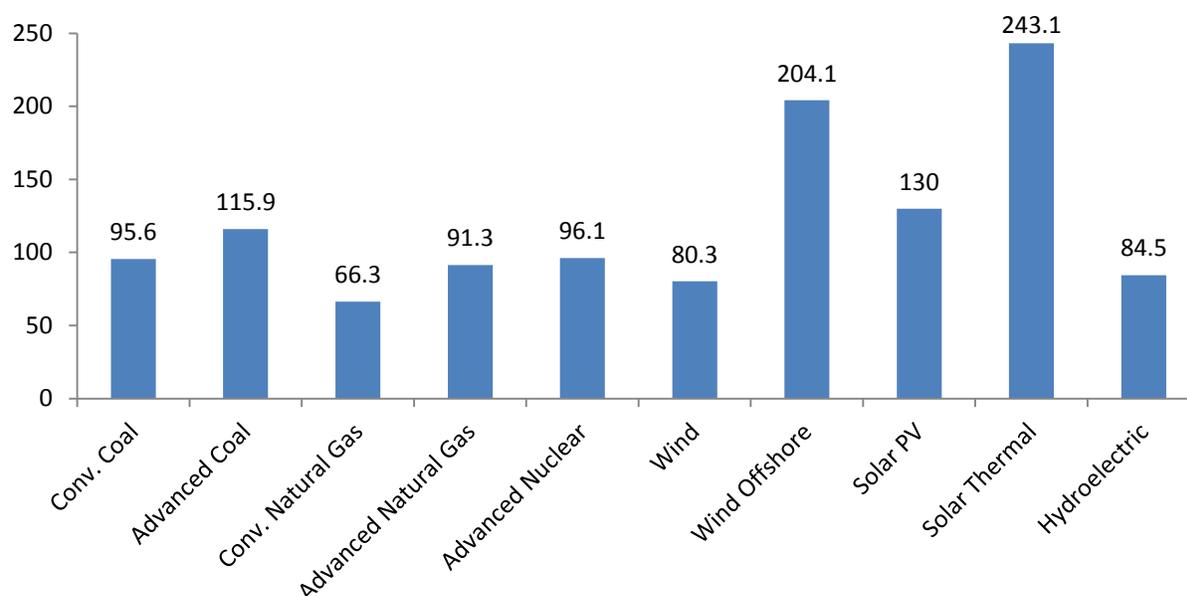
August 2014

## Executive Summary

There is currently a movement in America pushing for environmental effects to be taken into consideration when assessing new and existing business ventures. As emphasized by President Obama's 2014 State of the Union Address, a major area for this movement to make progress is within the energy sector [1]. Electricity production currently produces the most greenhouse gas emissions of any energy sector in the US, making it the energy sector where the largest environmental impact can be made with proper policy action [2].

Luckily, currently-available, low-emission renewable energy technologies are most well suited for electricity production over any other energy sector application. As a result of recent government regulations combined with high coal prices, coal plants, which currently dominate the electricity production landscape, are being retired at an accelerated rate [8]. This, combined with increased electricity demand, has opened up the door for new electricity production technology to be implemented. However, due to the low price of natural gas resulting mainly from the onset of fracking, efforts to implement new renewable-sourced electricity production facilities have been stalled in favor of natural gas power plants. While natural gas plants produce only half the carbon emissions of coal, and do not produce harmful byproducts such as sulfur dioxide or mercury, they are not as environmentally friendly as the other available alternatives, such as nuclear, solar, or wind [11] [12] [13] [14].

The fact that natural gas dominates the shift away from coal is not surprising, however, given the current economic landscape. The figure below shows the levelized cost of electricity (LCOE) for select available electricity production technologies, giving a \$/Mwh cost of production by factoring in all applicable costs (construction, fuel, maintenance, operation, etc.) [23].



US Average LCOE for Plants Entering Service in 2019, in 2012 \$/Mwh [23] **EIA LCOE**]

As seen in figure above, conventional natural gas currently offers the cheapest form of electricity production. It is important to note, though, that some alternatives like nuclear or wind are already competitive with other conventional electricity production methods like coal. Other alternatives, like solar or offshore wind, are still too expensive to be competitive at the moment, mainly due to the fact that electricity production from renewable sources is still too variable. With the advent of advanced electricity storage technology this issue would be eliminated, but such technology is currently unavailable or too expensive to be implemented economically [19].

Because of their positive environmental impacts, alternative electricity production methods are given some assistance by the federal government in order to make them more economically competitive. These economic aids mainly come in two forms: tax credits and loan programs. On the tax side, an installment tax credit allows solar production facilities a credit equal to 30% of the cost of implementation, while a production tax credit allows wind, hydro, and geothermal plants to receive a .23 cents/kwh credit. However, the installment tax credit is only available until the end of 2016, and the production tax credit already expired at the beginning of 2014 [26]. On the loan program side, the government has extended loans to help both nuclear and renewable power plants, though the renewable plant loan program expired in 2011 [27] [28].

On top of aid being given to alternative electricity production methods, the federal government can also level the playing field by putting a burden on conventional electricity sources. This mainly comes in one of two forms, a carbon tax or a cap-and-trade program, both of which seek to charge electricity producers for the amount of carbon emissions they produce. On top of producing revenue for the federal government, these programs help incentivize electricity producers to innovate new ways to reduce their carbon emissions. Though no such program has ever been implemented, a cap-and-trade program was able to at least pass the House in 2009 [24] [25].

Even small actions by the federal government can have noticeable effects in shifting the production methods used in the electricity production sector. Just a relatively small tax such as \$10/metric ton of carbon emissions would cause significant carbon emission reductions compared a scenario in which no government actions are taken [33]. Additional analysis specific to natural gas and renewables shows that any carbon tax would actually increase the amount of natural gas-based electricity production for the next couple of decades, and increase the amount of renewable-based electricity production indefinitely. Additionally, if current favorable tax policies for renewables are renewed long-term, the use of renewables is significantly higher than those projected given current tax policy deadlines, especially after 2030 [34] [35].

As a result, it is recommended that a two-pronged approach be taken to limit the amount of economic disturbance while ensuring the electricity production sector makes a greater shift towards renewables given the reduction of coal use. First, a carbon tax equivalent of \$10/metric ton of carbon emissions should be enacted to reflect the social cost of emissions. Each year this tax would increase 5% per year after inflation in order to push companies to innovate new carbon reduction technologies. Second, the production tax credit should be extended for all renewable

electricity production methods using the current credit of .23 cents/kwh. This credit would decrease 5% per year after inflation to mirror the carbon tax in order to account for the increased rate of improvement in renewable technologies and the relative advantage given by the increasing carbon tax.

It is important that such a program be long-term in order to allow industry to accurately model the economic landscape their projects will enter. Given the current gridlock in Washington and the long-term nature of implementing new electricity production facilities, a long-term tax plan is the only way to ensure economic stability. Factoring in only revenue from taxes on natural gas use and costs from credits extended to renewables use, such a program would pull in an average surplus of \$5.5 billion per year between 2015 and 2040; factoring in coal would increase this figure significantly, particularly in the near future. Feeding at least part of this surplus into loan programs for nuclear plants would ensure that an increased amount of low carbon electricity production facilities are able to come to market.

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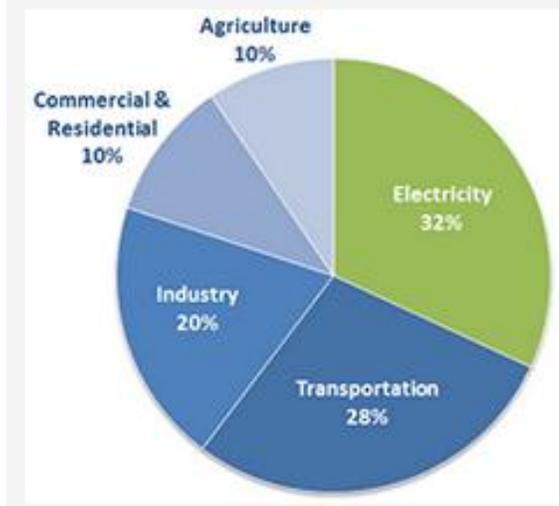
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## 1.0 Introduction

In his 2014 State of the Union address, President Obama stated that “[O]ne of the biggest factors in bringing more jobs back is our commitment to American energy”[1]. He stressed the importance of “a cleaner energy economy” and acknowledged that “[it] won’t happen overnight, and it will require tough choices along the way.” Though he touted the success of his “all-of-the-above energy strategy”, and highlighted the advantages of natural gas and solar, the President laid out no definitive plans for how the US would approach energy production in the future. However, with the release of recent carbon emission regulations, the executive branch seems to be taking at least some action to direct the country towards a cleaner energy economy. However, if a cleaner energy economy is going to happen in America, the legislative branch needs to get more involved by developing and implementing a long-term energy policy plan.

Of all the areas of energy production in the America, the most promising area for change is the electricity production sector, since a vast majority of alternative energy sources are most viable for electricity production instead of applications like transportation or residential heating. Luckily, this is also the energy sector in which the most impactful changes can be made: in 2012, electricity production was the largest single contributor to greenhouse gas emissions in the US, accounting for 32% of greenhouse gas emissions as seen in Figure 1 below [2].



**Figure 1.** Total Greenhouse Gas Emissions by Economic Sector in 2012 [2]

The implementation of a cleaner energy economy has shown to be a popular policy among voters from both parties. According to a Washington Post – ABC News poll from June 2014, 70 percent of voters say that the federal government should require limits to greenhouse gases from existing power plants. 57 percent of Republicans, 76 percent of Independents, and 79 percent of Democrats support state-level limits on greenhouse gas emissions. Most significantly, voters are willing to pay extra for energy if it means a reduction in greenhouse gas emissions. “Asked whether Washington should still go forward with limits [on energy-sector greenhouse gas emissions] if ‘they significantly lowered greenhouse gases but raised your monthly energy bill by 20 dollars a month,’ 63 percent of respondents say yes, including 51 percent of

Republicans, 64 percent of Independents and 71 percent of Democrats” [3]. These results suggest that Americans on both sides of the aisle are in support of implementing a cleaner energy economy.

In addition to the popularity of a cleaner energy economy, it also makes sense from an environmental and health stand point. On top of the fact that the reduction of greenhouse gas emissions reduces the rate of climate change, it brings along health benefits as well. With the release of its Clean Power Plan in June 2014, which seeks to cut carbon pollution from the power sector by 30% by 2030 by imposing stricter emission limits on existing plants, the EPA projects that “annual public health benefits will total somewhere between \$55 billion and \$93 billion by avoiding up to 100,000 asthma attacks and 2,100 heart attacks each year.” By contrast, they predict compliance cost of \$7.3 to \$8.8 billion per year, significantly lower than the expected public health benefits [4]

However, despite the ongoing executive branch actions regarding energy policy, the legislative branch has taken relatively little action regarding energy policy lately, mainly due to party-politics-driven gridlock. At the beginning of 2014, the Production Tax Credit for renewables was allowed to expire for the first time since 2004, and only the fourth time since its enactment in 1992 [5]. In May of 2014, the Senate allowed a bipartisan energy efficiency bill to die due to disagreement over other energy related issues, such as the fate of the Keystone XL pipeline and possible legislative response to President Obama’s climate change regulations. In fact, it has been 7 years since Congress passed a major energy bill, which means there has been no major legislative action in response to the changing energy landscape as a result of the shale fracking boom [6].

A plan for implementing a cleaner energy economy becomes even more important as energy demands increase, particularly when it comes to electricity production. As electricity demand increases, more electricity production facilities are built, and how these facilities produce electricity greatly affects their environmental impact. According to the EIA’s Annual Energy Outlook 2014 report, US electricity demand will increase from anywhere between 14% and 41% between 2012 and 2040, though their best estimates suggest that electricity demand will increase by 29% over this time period. Additionally, the growth of electricity demand is projected to increase sometime around 2025, marking the beginning of an upwards slope in electricity demand growth for the first time in 75 years [7].

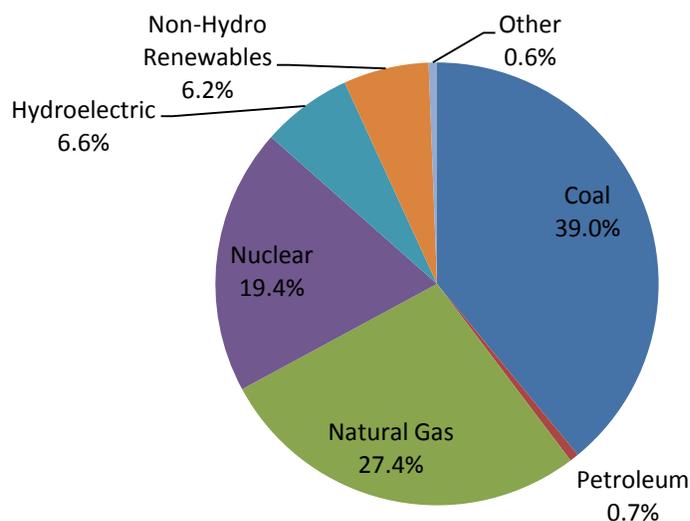
In order to meet this demand and fill the gap left behind by plant retirements, new electricity production facilities need to be built. As a result of recent emission regulations like the Clean Power Plan, coal power plants are being retired at an accelerated rate. However, due to the low price of natural gas in recent years thanks to fracking, much of this gap has been filled by natural gas fired plants instead of alternatives, like nuclear or renewables. This is mainly due to economics: even the cheapest alternative energy sources, which are on the verge of being if not already cost competitive to coal, simply cannot compete with the low price of natural gas. While natural gas is a lower-emissions alternative to coal, it has emissions nowhere near as low as alternative electricity sources.

The onset of natural gas is not a bad thing, however: using natural gas as a bridge fuel to reduce emissions in the immediate future while hoping that renewables become more cost competitive in the future is not unreasonable given the rate of development and investment in renewable technologies. Natural gas also offers the unique advantage of “spinning reserve”, a source that can quickly be powered up to meet rapid fluctuations in demand. This means natural gas can offer a flexibility that base load electricity sources like coal or nuclear cannot, while acting as a buffer against the variability of renewables like solar or wind.

Embracing natural gas in the here and now is also economically responsible, as it keeps electricity prices low by offering a cheap alternative to coal and helps support the growing American natural gas production market. However, without government action, this shift towards natural gas will dwarf any efforts to make renewables a larger share of our electricity production sector. If the government is serious about using natural gas as a bridge fuel to a cleaner energy economy in the electricity sector, a long-term policy needs to be enacted to slowly guide the market in the right direction.

## 2.0 Overview of Electricity Production Methods and Their Environmental Impacts

In order to discuss energy policy, it is first important to establish the electricity needs of the country, as well as the current capabilities of various electricity production methods and their effects of the environment. As seen in Figure 2 below, coal and natural gas currently dominate the electricity production sector, with nuclear and renewables making up the bulk of the remaining production.



**Figure 2.** Share of Total US Electricity Production by Source [Adapted from 8]

## 2.1 Coal and Natural Gas

The two main fossil fuel based / conventional energy producing sources, coal and natural gas power plants are currently the largest source of electricity in America, accounting for nearly two-thirds of the country's total electricity production [8]. Coal plants are relatively easy to keep in operation over a long time scale, but it is difficult for them to make relatively quick changes to production capacity in response to the changing needs of the grid, particularly during peak-usage hours. As a result, coal plants are very useful in providing a baseline power supply somewhere between peak and off-peak requirements.

Natural gas, on the other hand, allows for a very flexible energy production method. Gas flow rates into a furnace can be controlled with relative precision, unlike solid input streams found in coal plants. As a result, natural gas plants can be very responsive to the changing needs of the energy grid. In fact, natural gas plants are typically used to augment other energy production facilities for this very reason.

From an environmental perspective, the EIA considers conventional electricity sources like coal and natural gas as being the only contributors to CO<sub>2</sub> emissions in the electricity production sector. In 2010, the EIA reported that 1969 million metric tons of CO<sub>2</sub> were released by coal plants nation-wide, while 1285 million metric tons of CO<sub>2</sub> were released by natural gas plants [9].

However, coal tends to have other unique environmental impacts. First, burning coal tends to release nitrogen oxides, which tend to have larger warming potentials than CO<sub>2</sub>. For example, N<sub>2</sub>O has a SAR 100 year warming potential of 310, meaning that one ton of N<sub>2</sub>O has 310 times the impact on global warming compared to one ton of CO<sub>2</sub> over the course of 100 years [10]. From a life cycle assessment standpoint, coal plants produce 974 metric tons of CO<sub>2</sub> equivalent per gigawatt-hour, which accounts for this increased warming potential as well as CO<sub>2</sub> emissions due to non-production factors, such as plant construction or fuel transportation [11]. Coal also tends to produce SO<sub>2</sub>, which, along with nitrogen oxides, is the major man-made cause of acid rain. According to the EPA, "In the United States, roughly two-thirds of all SO<sub>2</sub> and one-quarter of all nitrogen oxides come from electric power generation that relies on burning fossil fuels, like coal" [12]. Additionally, coal plants are a major source of mercury, a highly toxic element. According to the EPA, "Coal-burning power plants are the largest human-caused source of mercury emissions to the air in the United States, accounting for over 50 percent of all domestic human-caused mercury emissions" [13].

In the case of natural gas, environmental impacts are lower than that of coal. According to the EPA, "... the burning of natural gas produces nitrogen oxides and carbon dioxides, but in lower quantities than burning coal". In fact, from a life cycle assessment standpoint, natural gas plants produce 469 metric tons of CO<sub>2</sub> equivalent per gigawatt-hour, less than half that of coal [11]. Additionally, the EPA states that "[e]missions of SO<sub>2</sub> and mercury compounds from burning natural gas are negligible". [14]. While the EPA also mentions that unburned natural gas being released either from a power plant or during transportation is a concern, though in 2009 the

EIA stated that “[i]ncreases in energy-related methane emissions [were] largely from underground coal mining”, suggesting that methane releases are more prevalent in the procurement of coal than in the use and transport of natural gas [14] [15].

## 2.2 Nuclear

In the US, nuclear energy makes up nearly one-fifth of all electricity production [8]. According to the World Nuclear Association, “it [nuclear power] is especially suitable for large-scale, continuous electricity demands, which requires reliability (i.e. base load)” [16]. In this way, nuclear power plants are analogous to coal plants in the sense that they are very useful in meeting baseline power needs, but have trouble making quick changes in response to fluctuating peak-hour demand.

From an environmental standpoint, “nuclear power plants do not emit CO<sub>2</sub>, SO<sub>2</sub>, or nitrogen oxides as part of the power generation process” according to the EPA [17]. However, as with all power production facilities, the construction of nuclear power plants leads to non-negligible greenhouse gas emissions. Based off a compilation of life-cycle emissions studies gathered by the Nuclear Energy Institute (NEI), nuclear energy’s life-cycle emissions are significantly lower than those of coal or natural gas plants, and are in fact comparable to those of renewable like solar, wind, or hydro [18]. From a life cycle assessment standpoint, nuclear produces 15 metric tons of CO<sub>2</sub> equivalent per gigawatt-hour, which is the second-lowest behind wind, and only about 1.6% that of coal plants [11]. Much of these emissions come from the construction of plants, which are significantly larger than other electricity production facilities, and the transportation of fuel.

## 2.3 Solar and Wind

As shown in Figure 2, only about 6% of electricity production in the US comes from non-hydro renewable sources. Of this 6%, a majority comes from solar (in the form of both photovoltaic cells and solar thermal) and wind [8]. Of all of the available technologies, solar and wind are the most challenging to integrate into the grid due to the fact that they are considered variable sources: if the sun doesn’t shine or the wind doesn’t blow, these technologies are not actively putting energy into the grid, meaning demand has to be met by some other means [19] [20]. In order to offset this, large-scale production facilities are looking into using some form of energy storage system. This would allow excess energy collected during times of sunshine or wind gusts to be used when the sun doesn’t shine or the wind doesn’t blow [19]. However, the storage capacity of current electricity storage technology is limited. As a result, any useful amount of electricity storage is currently too expensive, which limits the viability of renewables.

From an environmental standpoint, neither solar nor wind produce carbon emissions during their operating lifetime, since their energy is derived from the sun and not from burning fossil fuels [19] [20]. However, like nuclear, solar and wind do have some emission impacts due to the processes used to manufacture materials and construct plants: wind is responsible for 14 metrics tons of CO<sub>2</sub>-equivalent per gigawatt-hour, while solar photovoltaics are responsible for

39 metric tons of CO<sub>2</sub> equivalent per gigawatt-hour [11]. As with nuclear plants, many of the emissions related to renewables come from construction of production facilities. In the case of solar photovoltaics, higher life-cycle emissions are seen as a result of the emissions that result from the manufacturing process of the solar cells themselves.

## 2.4 Other Renewables

Solar and wind are not the only renewable sources of energy available to the US. As seen in Figure 2, nearly 6.6% of electricity production comes from hydro plants. The main issue with hydro is that most of the available sites for dams in the US have already been dammed, meaning there is little room for expansion. As a result, the Obama administration has identified a collection of dams that currently do not produce electricity, but outfitting these dams with turbines would only increase the current US hydro capacity by roughly 15% [21]. Another alternative energy source is geothermal, which utilizes naturally-occurring underground sources of heat to power turbines. While this energy is clean, it is only available on a regional basis: Hawaii and the western US have a large geothermal production potential, while areas like New England do not [22]. Since hydropower does not have a lot of potential for growth, and geothermal is regionally specific, they will not be explored as in-depth in this paper.

## 2.5 Environmental Impact Summary Table

Table 1 below summarizes the life-cycle environmental impact per gigawatt-hour of the main electricity production methods highlighted in this paper.

Technology	Metric Tons of CO <sub>2</sub> released / GWh
Coal	974
Natural Gas	469
Nuclear	15
Solar	39
Wind	14

**Table 1.** Life-Cycle Environmental Impact Summary of Electricity Production Technologies [Adapted from 11]

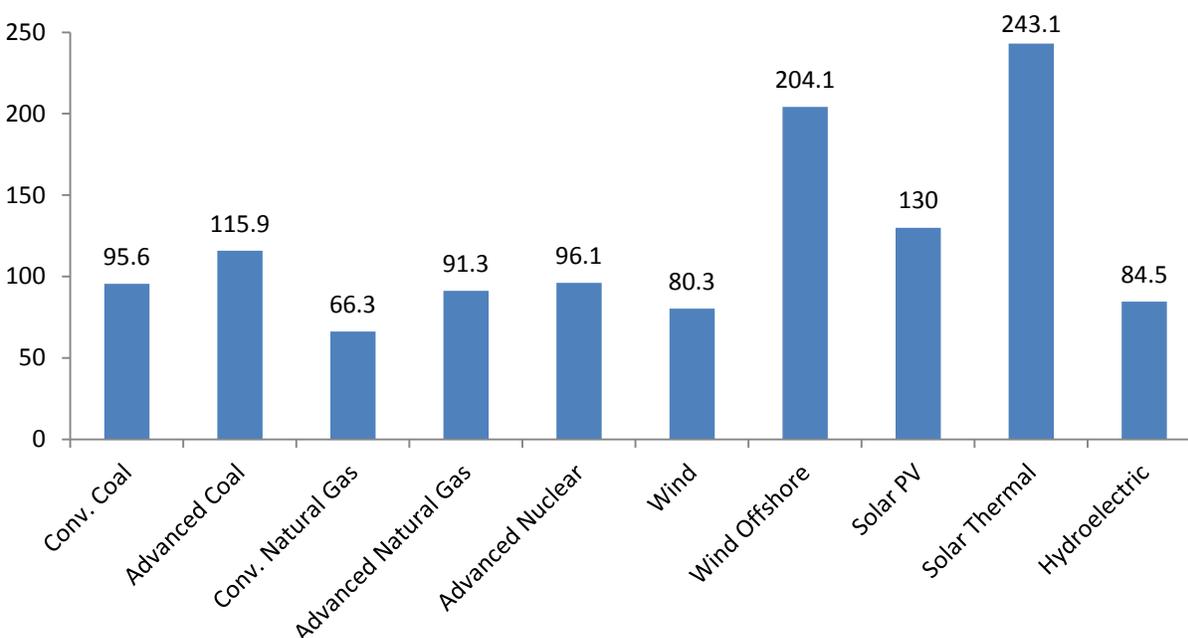
## 3.0 Economics in the Electricity Production Sector

On top of technological limitations and environmental concerns, economics plays a major role in determining which technologies get used for energy production. On the production side, economic factors tend to play a major role in determining which electricity production

technologies are utilized by producers. On the consumer side, the electricity production technology used by electricity providers plays a role in the price of electricity sold to consumers.

### 3.1 Comparing Costs of Electricity Production Technologies

Due the wide range of variables present in energy production, it can be difficult to compare the cost of one electricity production technology to another. However, a useful metric, levelized cost of electricity (LCOE), lays out the cost of given technologies on a per-MWh basis, factoring in such costs as construction, fuel, operating costs, maintenance, and financing costs [23]. Figure 3 below shows the US average LCOE for plants entering service in 2019, in 2012 dollars/MWh, and does not factor in any public financial support (tax credits, subsidies, etc.).



**Figure 3.** US Average LCOE for Plants Entering Service in 2019, in 2012\$/MWh [23]

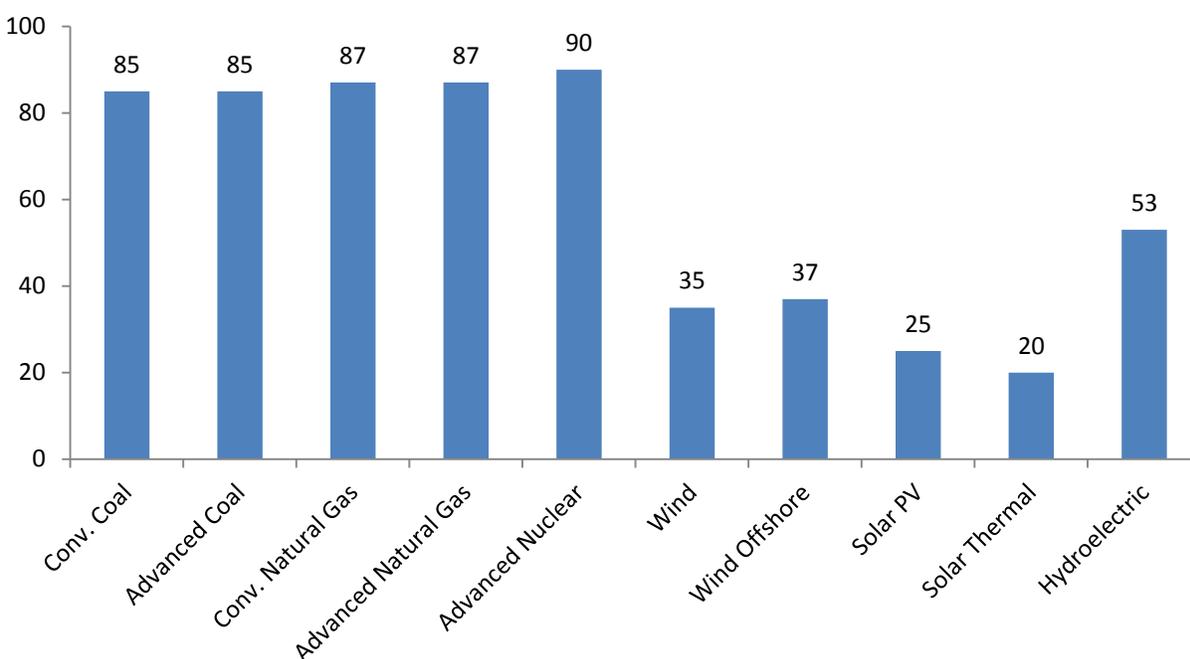
As Figure 3 shows, the conventional energy production sources, coal and natural gas, are currently the cheapest available electricity production technologies, which explains why they currently account for such a large portion of US electricity production. Much of this can be contributed to the low price of fuel. Natural gas in particular is benefitting greatly from low fuel prices as a result of the recent American shale fracking boom. However, advanced coal and natural gas facilities, which incorporate carbon capture and sequestration technologies, are significantly more expensive than their conventional counterparts.

While coal and natural gas remain the cheapest electricity production technologies, it is important to note that there are alternatives that are already competitive. For example, the LCOE of nuclear energy is nearly the same as conventional coal and advanced natural gas, and is in fact less expensive than advanced coal. This is particularly noteworthy since nuclear fills the same base load electricity production role as coal, and produces no greenhouse gas emissions during

its operational lifetime. It is also important to note that, while many of the renewable energy sources are significantly more expensive than conventional sources or nuclear, wind built on land has the second lowest LCOE, higher than only conventional natural gas.

### 3.2 Capacity Factor

One factor contributing to the relative expense of renewable sources, such as offshore wind or solar, is their variable nature. Since they are not able to produce electricity at all times of the day, renewable sources suffer from prolonged periods of not operating at peak capacity. The easiest way of quantifying this is through capacity factors, the ratio of actual output to the theoretical output if the plant could operate at full capacity indefinitely. A comparison of capacity factors for each electricity production technology can be seen in Figure 4 below.



**Figure 4.** Capacity Factor (%) of Various Electricity Production Technologies [23]

It is important to note that there is no electricity production technology with a capacity factor of 100%: plants do not always run at maximum capacity, and require downtime for things like routine maintenance or system upgrades. However, it is easy to see that renewable sources have significantly lower capacity factors, mainly due to the fact that they cannot produce electricity at all times of the day. Because of this, capital and operating costs of renewable energy plants factor significantly more into their LCOE.

However, with advancements in technology, particularly in the energy storage field, the capacity of renewable sources could significantly increase, and possibly even become comparable with conventional sources. This would cut LCOE by anywhere from 40-70% (depending on current capacity factor). If this electricity storage is cheap enough, even the most

currently expensive renewable energy technologies would be competitive with conventional sources.

#### **4.0 Recent Policy Strategies**

In recent years, legislators have used a wide variety of strategies to help shape the electricity production sector, most notably by offering some form of economic incentive to desirable technologies. These economic incentives typically come in the form of tax credits, though they may also come in the form of subsidies or guaranteed loan programs. Congress has also made efforts in the past to enact a carbon tax program, but such a program has never been able to make it out of Congress [24] [25].

#### **4.1 Tax Credits for the Electricity Production Sector**

The major economic incentive congress has implemented is by extending tax credits to electricity producers, which reduces the amount of taxes they have to pay to the federal government and thus improving their bottom line<sup>1</sup>. Recently, these tax credits have been targeted at renewable electricity resources, most notably solar and wind, though to a lesser extent hydroelectric and geothermal as well [26]. These tax credits have taken on two different forms: an investment tax credit and a production tax credit.

The investment tax credit allows qualifying electricity producers to receive a tax credit equal to a certain percentage of their initial cost of implementation. Solar energy installments are eligible for a 30% credit, while geothermal plants are eligible for a 10% credit. These credits have no limit. As of right now, these tax credits extend to any qualifying facility put in service before January 1, 2017. Wind power facilities put in service between 2009 and 2012 were also eligible for a 30% investment credit, but that has not been renewed [26].

The production tax credit, on the other hand, allows qualifying electricity producers to receive a tax credit based off the amount of electricity produced. As of the end of 2013, this tax credit was 2.3 cents / kWh, and extended to wind, geothermal, and hydropower facilities [5] [26]. If a facility qualifies for both the investment and production tax credit, they are only permitted to claim one of them, at their choosing. The production tax credit extended to any qualifying facility under construction by January 1, 2014, and is available for qualifying facilities for the first 10 years of operation. However, since January 1, 2014, the production tax credit for renewable electricity production facilities has not been extended [26].

#### **4.2 Loan Programs**

The federal government also offers loan programs for electricity producers. These loan programs differ from tax cuts mainly in the fact that producers are required to pay back their loan; while there is a cost to the federal government, it is only in the risk of borrowers defaulting,

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<sup>1</sup> It is important to note that non-profits, such as municipal utilities and utility cooperatives, do not pay taxes, meaning that federal tax cuts do not have an effect on their bottom line. While alternative programs to incentivize non-profits do exist, they are not covered in the scope of this paper.

which has historically been low. Under Title XVII of the Energy Policy Act of 2005, two loan programs were outlined that are still used today: section 1703 and section 1705 [27] [28].

Section 1703 provides loans for “a new or significantly improved technology that is NOT a commercial technology” [27]. Qualifying facilities must also be located in the US. In the current state of the electricity production sector, the only facilities that really meet these requirements are related to nuclear energy; the most recent loans are an \$8.3 billion loan for two new nuclear power plants in Georgia and a \$2 billion loan for a uranium enrichment plant in Idaho [27]. This program is essential to nuclear power plants, as the most prohibitive cost to entering the market for nuclear plants is upfront capital costs. Due to relatively low operating costs once the plant is built, loan repayment is usually not an issue.

Section 1705, on the other hand, focuses on loan programs for renewable energy production facilities. Unlike section 1703 rules, section 1705 has a time limit, and was only available to projects that had begun construction before September 30, 2011. Since then, this project has not been renewed. Section 1705 loans tend to be lower than their section 1703 counterparts: one of the more expensive section 1705 loans was for \$1.3 billion to an Oregon-based wind farm [28].

The major significant difference between section 1703 and 1705 loans is how the Credit Subsidy Cost (CSC) is handled. By law, the CSC, which is “the expected long-term liability to the Federal Government by issuing the loan guarantee”, must be paid either by budget appropriations or by the borrower directly. For section 1703, which tend to have more expensive loans and thus larger CSCs, the CSC is paid by the borrower. For section 1705, the CSC was paid for by appropriations [27] [28]. In the American Recovery and Reinvestment Act of 2009, \$6 billion was appropriated towards section 1705 CSCs. [29]

### **4.3 Carbon Tax and Cap-and-Trade Program**

On top of offering economic benefits to desirable electricity production methods, Congress can also place economic burdens on undesirable electricity production methods. In the electricity production sector, this can be practically done in one of two ways: either a carbon tax or a cap-trade-program.

A carbon tax works very simply: electricity producers pay an additional tax for each unit of carbon produced during electricity production. This means that carbon-heavy electricity production facilities like coal (and to a lesser extent, natural gas) power plants would pay an additional amount for their electricity production, thus increasing their LCOE. In the same way that tax credits and subsidies seek to level the economic playing field by making renewables cheaper, a carbon tax would seek to level the playing field by increasing the cost of conventional electricity production methods. However, there has never been a carbon tax approved by either chamber of Congress.

An alternative method to a carbon tax is a cap-and-trade program, which seeks to place an artificial limit on the amount of carbon that can be emitted. Once this limit has been determined, electricity producers can buy permits to emit certain amounts of carbon dioxide. The

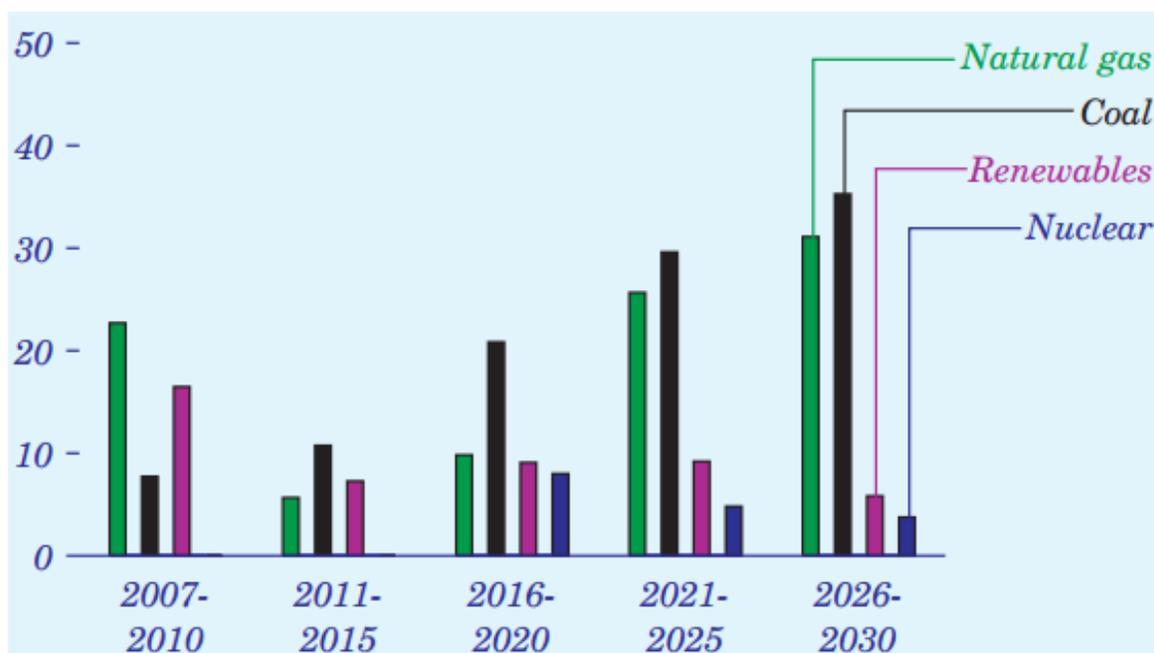
government only sells as many permits as it takes to reach the cap, and then monitors the emissions of each producer to make sure they do not exceed their permitted limit. Producers are able to buy or sell permits to or from other producers as needed.

Cap-and-trade programs create economic incentive to reduce carbon emissions in two ways: first, reducing carbon emissions means that electricity producers need to buy fewer permits, saving them money. Second, if producers reach their permitted cap, their competitors determine the cost of additional permits (since each company now control its own excess permits, not the government). This means exceeding the permitted carbon emission limit can be disproportionately costly, either through the purchase of competitor permits or paying government fines.

In order to ensure long-term carbon emission reduction, cap-and-trade programs also incorporate a permit allowance reduction system. This means that, each year, the amount of permits allowed is reduced, effectively lowering the acceptable amount of carbon dioxide that can be emitted by electricity producers. While a cap-and-trade program did make it out of the House in 2009, the bill was never heard by the Senate, and died when that session of Congress ended [24] [25].

### 5.0 Projected Electricity Sector Growth: Electricity Sector Capacity Additions for 2013

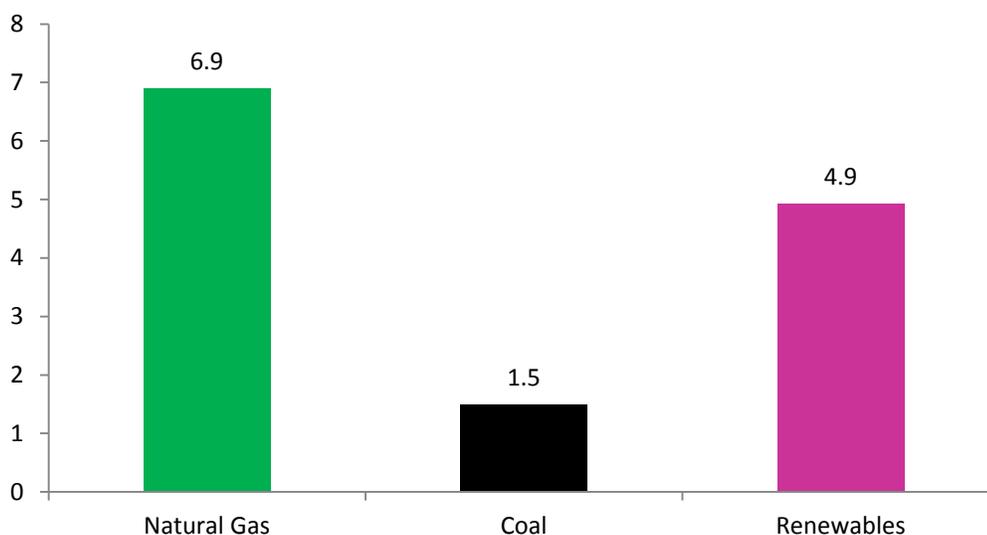
In order to establish a reference case, it is useful to look at how the electricity production sector has changed recently. Figure 5 below shows the EIA projections for electricity sector capacity additions from 2008.



**Figure 5.** Electricity Generation Capacity Addition Projections by Fuel Type, 2008 (Gw) [30]

As Figure 5 shows, in 2008, it was projected that coal would begin to dominate electricity production additions starting in 2011. Much of this can be attributed to the increasing cost of natural gas, as shale fracking was still in its infancy in 2008. Additionally, renewables, which see a large spike in 2007-2010, were projected to fall by the wayside after 2010 as they begin to be dwarfed by both natural gas and coal.

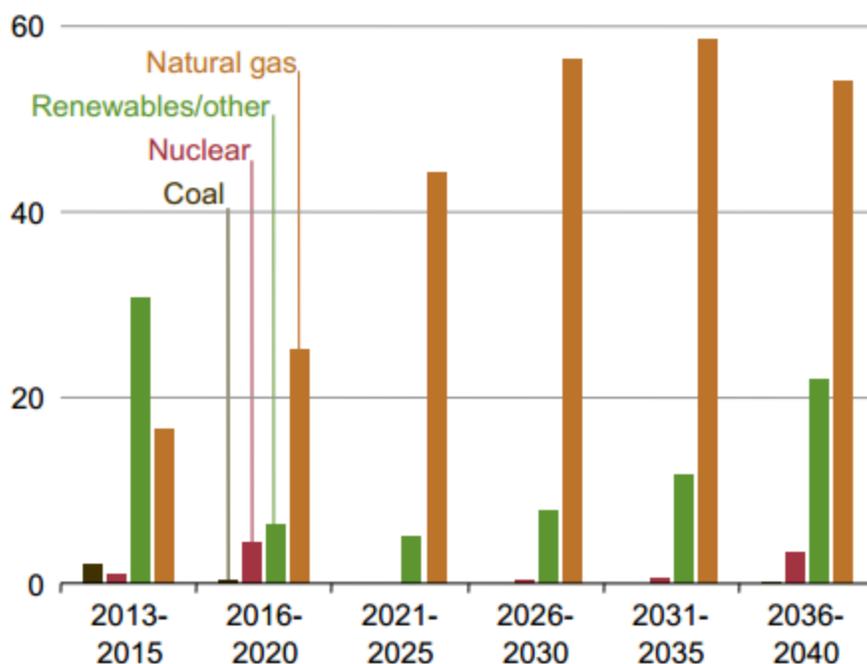
However, as a result of the shale fracking boom, the reduced cost of renewables, and increased government pressure to reduce carbon emissions, these 2008 projections do not reflect what has actually happened in recent years. Figure 6 below shows the electricity generation capacity additions for 2013.



**Figure 6.** Electricity Generation Capacity Addition by Fuel Type 2013 (GW) [Adapted from 31]

As seen in Figure 6, natural gas dominated new capacity additions, accounting for more than half of the electricity capacity additions in 2013. Renewables made up roughly one-third of new additions, which is attributed to the completion of a number of large scale solar thermal plants in Arizona and California as well as “falling [photovoltaic] costs, aggressive state renewable portfolio standards, and continued federal investment tax credits” [31]. Coal makes up a meager 11% of new capacity additions, in stark contrast to the projections shown in Figure 5.

Long term projections have also changed to reflect the changing economic and political landscape surrounding electricity production. Figure 7 below shows the EIA projections for electricity sector capacity additions from 2014.

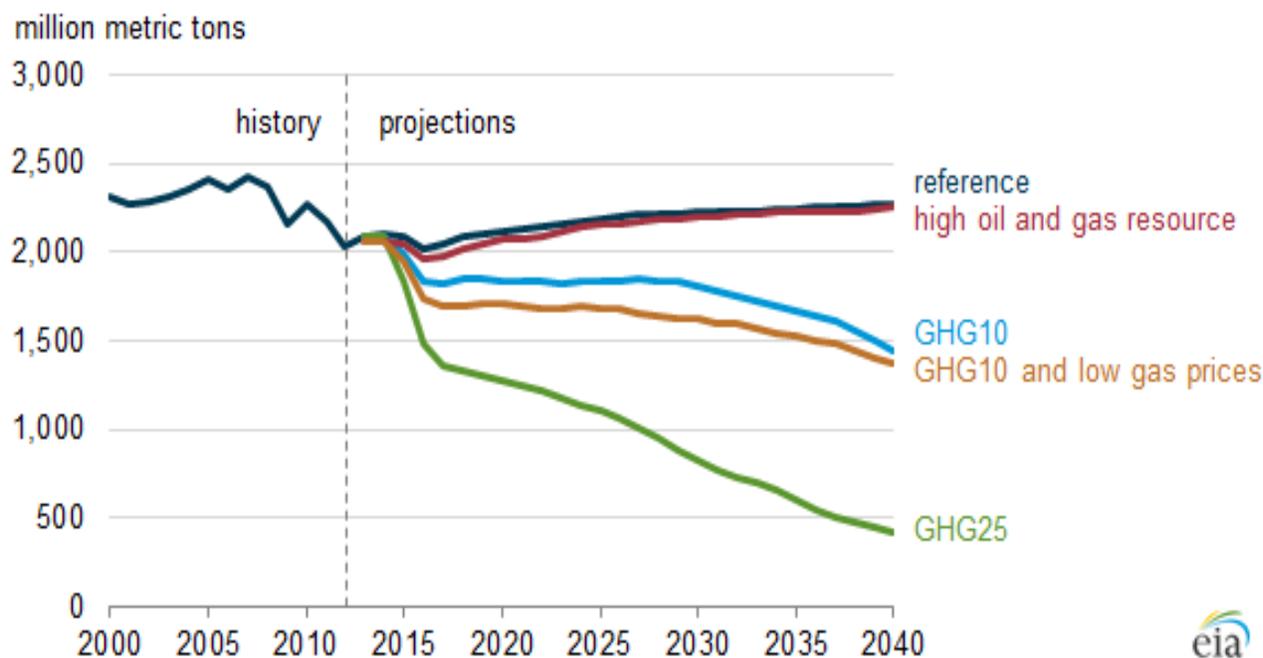


**Figure 7.** Electricity Generation Addition Projections by Fuel Type 2014 (GW) [32]

As Figure 7 shows, natural gas dominates new additions through 2040, mainly as a result of low gas prices. Coal additions fall virtually to 0 as a result of increased emissions regulations. Most alarmingly, the addition of renewables is actually lower than those projected in 2008 for the period between 2016 and 2035. This is mainly due to the extremely low cost of natural gas relative to any other fuel source, making it take up a larger share of the new additions in the 2014 projections than conventional sources did in the 2008 projections. It is important to note, however, that these projections only show a reference case where no additional government actions are taken.

### 5.1 Policy Action Effects: Overall Carbon Emissions

Despite the recent transition from coal to natural gas, as well as the increased onset of recently-cheap renewables, carbon emissions from the electricity production sector are projected to increase over the next several decades if current laws and regulations remain in effect. This is mainly attributed to the shift towards natural gas-based electricity production and the shift away from renewables and nuclear as a result of cheap natural gas for the foreseeable future [33]. However, if some form of carbon tax is implemented, carbon emissions could decrease instead increase, as seen in Figure 8 below.



**Figure 8.** Electricity-Related CO<sub>2</sub> Emissions in Five Cases, 2000-40 [33]

Figure 8 takes into account five different potential cases. The reference case reflects no change in laws or regulations surrounding electricity production and assumes relatively constant economic factors relative to those in 2014. As seen in Figure 8, the reference case shows a 12% increase in emissions up through 2040 [33].

The GHG 10 and GHG 25 cases both refer to the implementation of a carbon tax (or equivalent cap-and-trade permit cost) in 2015 of \$10 / metric ton of CO<sub>2</sub> or \$25 / metric ton of CO<sub>2</sub>, respectively. The GHG 10 case shows a 16% lower CO<sub>2</sub> emission rate in 2025 and a 36% lower CO<sub>2</sub> emission rate in 2040 relative to the reference case. The GHG 25 case shows an even greater decrease in CO<sub>2</sub> emission rates, with a 49% reduction in 2025 and an 82% reduction in 2040. In both cases, there is a large dip in emission rates before 2020, partially due to an accelerated shift away from coal and partially due to an increased implementation of renewables [33].

The High Oil and Gas Resource case assumes the same conditions as the reference case, except that oil and gas resources become more abundant than currently projected. In this case, CO<sub>2</sub> emissions decrease ever so slightly more than in the reference case as a result of increased shift towards natural gas, but by 2040 emission rates are roughly the same as the reference case as a result of producers expressing and increased favor towards natural gas relative to renewables [33].

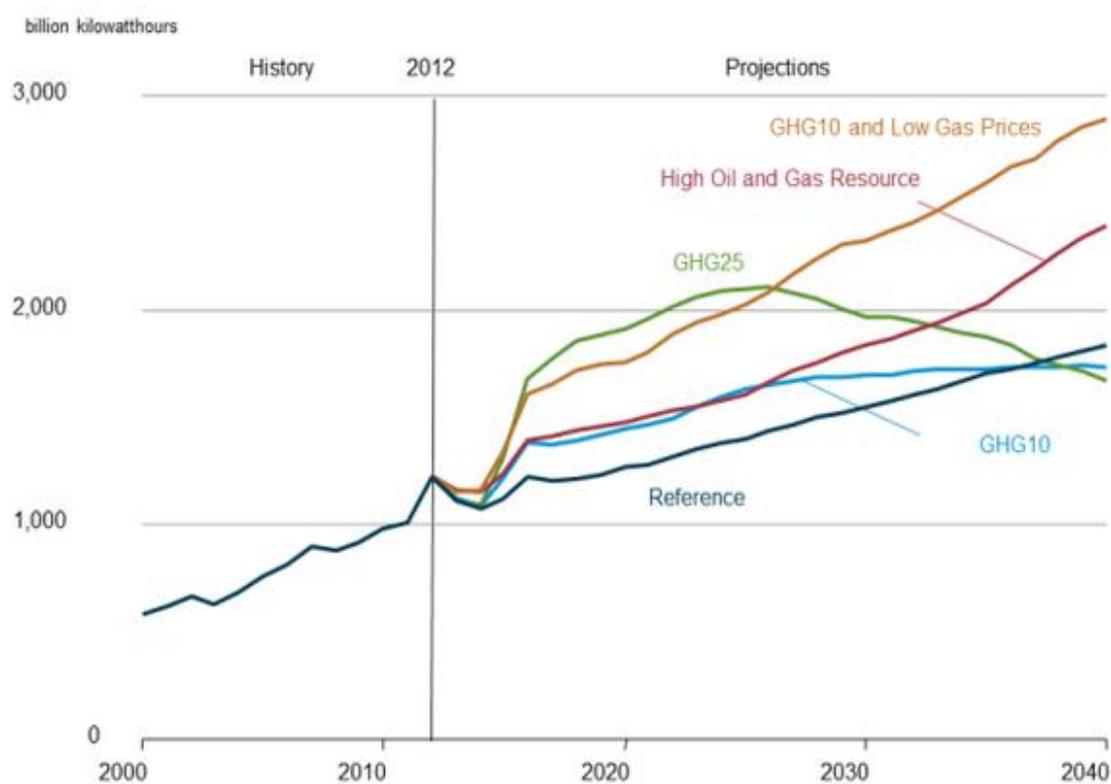
Finally, the GHG 10 and Low Gas Prices case effectively combines the GHG 10 and High Oil and Gas Resources cases. In this case, reduction of CO<sub>2</sub> emissions before 2020 is greater than those seen in the GHG 10 case, mainly due to an even greater shift from coal to natural gas. However, because a greater share of this shift away from coal is given to natural gas and not renewables, CO<sub>2</sub> emissions do not decrease as drastically after 2030 compared to the

GHG 10 case; it can be extrapolated that CO<sub>2</sub> emissions would actually begin to be higher than the GHG 10 case sometime between 2040 and 2050 [33].

Overall, these cases suggest that some form of action needs to be taken in order to produce a marked reduction in carbon emissions from the electricity production sector. If nothing changes, CO<sub>2</sub> emissions will increase slightly over the next 40 years, in contrast to the significant emission reductions we've seen since 2005. Emissions get even worse with an increased gas resource and lower gas prices, which may result with the advancement of fracking and other extraction technologies. Based off of this projection, the only way to continue a trend of CO<sub>2</sub> emission reduction is to accelerate the shift away from coal and ensure that an increased share of that shift is made up of renewables or nuclear.

## 5.2 Policy Action Effects: Conventional Fuels

When assessing the viability of the cases listed in the previous section, it is important to understand the effects of each action on each specific electricity production method. As discussed previously, there is already a shift towards natural gas and away from coal in response to lower gas prices and increased carbon emission regulations. Figure 9 below shows how possible policy actions may augment that shift by showing the projected natural gas electricity generation in the five previous cases.



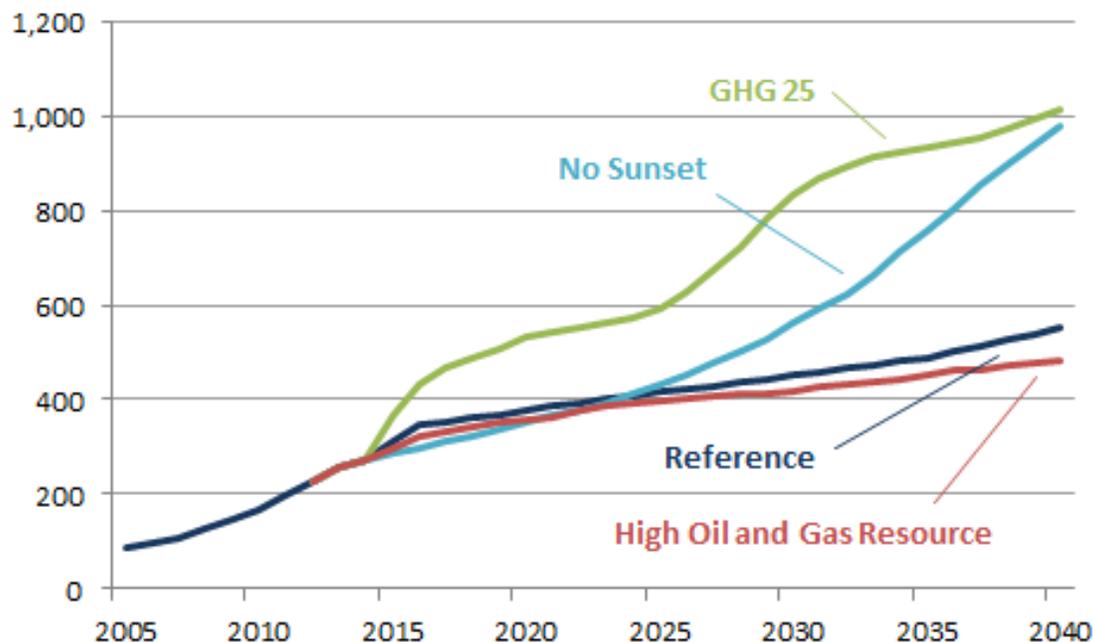
**Figure 9.** Natural Gas Electricity Generation in Five Cases, 2000-40 [34]

As seen in Figure 9 above, electricity production via natural gas is projected to increase over the next several decades in all cases. In the reference case, we see a relatively stable and constant increase of natural gas fired plants as they replace retiring coal plants; in 2012, 37% of electricity generation comes from coal, and in 2040 that share is 32%, marking a relatively slow shift [34]. With a high gas resource, this shift is more dramatic in the near future, and the long term rate of increase in natural gas plants is also slightly higher than the reference case.

The most interesting part of this projection, however, is the effects of a carbon tax. In all GHG cases, the shift towards natural gas in the near future is increased relative to the reference case. In the GHG 10 case, the share of electricity from coal is 28% in 2025 and 19% in 2040. For the GHG 25 case, the shift is even more drastic, with the coal share being 10% in 2025 and 1% in 2040 [34]. In both cases, the increase in natural gas production is curbed by the increased implementation of nuclear or renewables: in the GHG 10 case, natural gas electricity production levels off around 2030, while in the GHG 25 case, it actually decreases starting in 2025. However, if gas prices remain low, natural gas electricity production continues to increase through 2040, reaching the highest level of any of the five test cases.

### **5.3 Policy Action Effects: Renewables**

Despite the fact that natural gas dominates new electricity production additions, renewables are also seeing an increase in implementation as the electricity production shifts away from coal. However, without some form of government action, the rate of renewable additions will be dwarfed by those of natural gas, leading to the increased carbon emissions seen in Figure 8. Figure 10 below shows the effects of some possible government actions by plotting the projected renewable electricity generation in four cases.



**Figure 10.** Renewable Electricity Generation in Four Cases, 2000-40 (billion kWh) [Adapted from 35]

In all cases, electricity generation from renewables increases over the next few decades. However, for the reference and high gas resource cases, the rate of increase in renewables is less than that seen between 2000 and 2014, mainly due to the increased implementation of natural gas power plants. The no sunset case shows the effects of extending renewable tax credits (i.e. the installment tax credit and the production tax credit) indefinitely in their current forms. In this case, the growth seen between 2000 and 2014 remains relatively constant through 2025, at which point the rate of implementation of renewables begins to increase steadily. In the GHG 25 case, a large increase is seen just after 2015 in response to the implementation of the carbon tax, after which the rate of implementation of renewables begins to level off. However, around 2025, electricity generation from renewables begins to increase dramatically once again, as more projects come into completion in response to the increased cost of natural gas power plants, whose production begins to decline as seen in Figure 9.

Compared to the reference case, both the no sunset and GHG 25 cases see disproportionate increases in solar and wind relative to other renewables like hydro or geothermal. When it comes to solar, electricity production in both cases is triple that of the reference case in 2040; for wind, it's double. In both cases, geothermal actually sees slightly lower electricity production in 2040 compared to the reference case, and hydro sees relatively little growth between 2014 and 2040 in all cases [35].

## 6.0 Policy Recommendations

The electricity production sector in the US is rapidly changing as a result of the shale fracking boom. While the large shift from coal to natural gas will improve carbon emissions on a

per kwh basis, the low price of natural gas is also reducing the amount of renewable sources entering the market. If no government action is taken, the growth of electricity demand will still mean an increase in carbon emissions from the electricity production sector over the next 30 years due to the low prices of natural gas. If the government truly wishes to use natural gas as a bridge fuel to a low-carbon electricity sector, a carbon tax needs to be implemented and tax credits for renewables need to be extended.

A carbon tax is necessary to appropriately reflect the societal cost of carbon-emissions-heavy technology. However, a large carbon tax is not necessary, and would cause unnecessary instability as the market acted swiftly to adjust. Instead, a low carbon tax that progressively increases is the most responsible way to implement such a change. Based off the projections in Figures 8 and 9, a carbon tax of \$10 / metric ton of CO<sub>2</sub> would lower carbon emissions in the electricity production sector without drastically changing the economic viability of natural gas facilities. This tax would increase at a rate of 5% per year in order to incentivize investment in further carbon emission reduction technology. For a cap-and-trade program equivalent, this means the acceptable level of carbon emissions each year would be reduced, effectively increasing the cost of emissions a proportional amount.

On the other side of things, renewable technology still needs some assistance to be competitive with conventional fuels, as seen in Figure 3. However, the current split between the investment tax credit and the production tax credit makes the development of new and improved renewable technologies difficult, as it is more difficult to predict the economic environment these technologies will emerge into. A single, long-term tax strategy would offer economic stability and predictability that promotes private investment that has been yet unseen. In this way, a single, long-term tax strategy should be used to incentivize the use of all types of renewables in the electricity sector.

Of the two programs currently available, fully embracing the production tax credit makes the most sense, as it incentivizes the implementation of energy efficient and energy dense technologies<sup>2</sup>. It also incentivizes the development of improvements that reduce the upfront cost of these technologies, which help open them up to small scale residential and commercial consumers. The current rate of 2.3 cents per kwh is an appropriate start-point for such a tax program, but with the implementation of a carbon tax, indirect incentive towards renewables increases proportionately. The increasing nature of the carbon tax combined with the increased rate of improvement for renewable technologies actually means that the production tax credit can be slowly reduced. As such, a 5% reduction per year to mirror the carbon tax rate increase would be appropriate.

In both the carbon tax and the production tax credit, both programs need to be comprehensive and long term in order to allow the electricity producers to accurately model the economic environment that they will be entering with new projects. Due to the long-nature of construction of electricity production facilities, as well as the long operating life-time of these

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<sup>2</sup> Again, this credit would not incentivize non-profit utility providers. Alternative programs, not covered in the scope of this paper, could be used to incentivize these utility providers.

facilities, stability in the tax structure from the government is paramount. The unexpected expiration of the production tax credit in 2013 mainly to political gridlock is unacceptable, and should be avoided in the future if at all possible.

All in all, if such a two pronged approach of a \$10 / metric ton carbon tax combined with an extension of the production tax credit is used, the government will turn a net profit as a result. Based on the projections in Figures 9 and 10, there will be an average profit of \$5.5 billion per year between 2015 and 2040 under such a program, with yearly profits ranging between \$4.5 billion and \$6.1 billion [adapted from 40 and 41]. Keep in mind that these projections only factor in the revenue from natural gas facilities; factoring in the revenue of coal should increase revenue further, despite the increase in cost from the increased use of renewables.

It is further recommended that the money made from this program be reinvested in the loan programs for electricity producers. While the reintroduction of the section 1705 program may be beneficial, it seems more beneficial to use this money to offset or eliminate the CSC cost burden on borrowers of section 1703 loans. With the accelerated retirement of coal, reduced or eliminated CSC costs would incentivize increased use of nuclear power, which acts as a more practical and carbon neutral base load power supply alternative compared to natural gas.

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