

2nd EXPERT MEETING ON FINANCING CCS PROJECTS

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The IEA Greenhouse Gas R&D Programme supports and operates a number of international research networks. This report presents the results of a workshop held by one of these international research networks. The report was prepared by the IEA Greenhouse Gas R&D Programme as a record of the events of that workshop.

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Further information on the network activities or copies of the report can be obtained by contacting the IEA Greenhouse Gas R&D Programme at:

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Executive Summary

The expert meeting provided an opportunity for discussion on the issues that are restricting the development of carbon capture and storage (CCS) in North America from a financial perspective. The meeting enabled a discussion of the possible options to overcome hurdles as well as ways to facilitate and encourage more CCS projects. Numerous unresolved issues and potential difficulties in the use of CCS still exist, including insurance, viable financial incentives and the need for the establishment of a robust policy and regulatory framework.

An important outcome is that many of the speakers thought the difficulties and issues surrounding CCS can be resolved. However, from a private investment viewpoint CCS in North America was an unattractive financial option without Government incentives and a legal framework in place. There was also a general consensus that if the USA implemented an emission trading systems that the revenue would need to be targeted at CCS and relying on a market derived carbon price would still not be enough to make CCS a financially viable option in the near to medium term. The conference discussion provided the following points of note:

- The view from the investment banks was that there would be no major private investment in CCS in the USA until they can be offered a secure return on their investment, such as loan guarantees or tax credits.
- Development of CCS regulatory frameworks is well underway internationally in a number of regions. The speed of development may be enhanced with the launch of the IEA CCS International Regulatory Network.
- The Interstate Oil and Gas Compact Commission (IOGCC) recommends that in the USA that CO₂ storage should be regulated as a commodity to allow the application of oil and gas conservation laws to facilitate development of storage projects. The IOGCC has a Task Force that also produced a set of guidelines on permitting CCS projects.
- There are a number of CCS projects underway in North America and future possibilities through the restructuring of FutureGen. In Canada, the Government intends to have new coal fired plants capture ready by 2018.
- There is a perception that an emissions trading scheme will not be enough to accelerate deployment of commercial CCS projects in the future and that other incentives will be required.
- There are several proposals in the USA investigating how to facilitate the deployment of CCS. For instance the proposed bill by Lieberman-Warner has use of some of the revenues from sale of allowances to fund low carbon technology projects including CCS. Further proposals discussed at the meeting were the use of the Bond market and setting up a Trust Fund for CCS.
- There is a clear gap in the USA about information on CCS with the general public and within the financial sector and hence an urgent need to provide further information and educate people about the risk and benefits of CCS in an informed manner.

- Legal and environmental liability is seen as an issue. Insurance companies do currently have the business models to insure CCS projects during the operational phase but there is a lack of data to provide coverage for the long term liability that would exist post-injection. Development work in this area is critical.
- Quantifying the potential long term liability of CCS projects in dollar terms would allow insurance companies to assess the underwriting that is needed. Otherwise until more information is available for long term liability in CO₂ storage there is likely to be only limited insurance on a 1-2 year revolving contract.
- If financing of CCS is to occur from the private sector then the 30 trillion dollar bond market must be utilized. This is unlikely to occur until there is greater regulatory certainty from the US government and the States, and greater certainty of cost recovery approval and permitting allowed by the local public utilities commissions. Ultimately, the willingness of ratepayers to pay higher electricity bills to pay for CCS, as reflected in decisions by local public utilities, will be critical to the financing of such projects.

Introduction

The CCS Expert Meeting on Finance took place over two days in New York. This meeting was a follow up to one that was held in London during 2007. The Meeting was by invitation and limited to 80 people that included representatives from Governments, industry, insurance, financial institutions, academia and research organizations.

The main purpose of the conference was to provide a clearer picture of the options available to finance CCS projects in North America and to increase the involvement of experts from the financial sector in discussion about possible financial instrument options for CCS. The ultimate outcome of this work will be to identify, encourage and develop world-wide collaboration and practical development of financial mechanisms to accelerate the progression of CCS projects from R&D to commercial reality.

The objectives of the meeting were to explore the options of:

- Identifying key drivers on financing CCS projects in North America by the financial sector.
- Contributing to building financial mechanisms for deployment of CCS projects
- Gaining access to financial information relevant for all major stakeholders such as industry, insurance companies, Government and investors in CCS projects
- Use of futures, derivatives and insurance markets to reduce financial risks of CCS deployment
- Improving the awareness of the status of CCS technology for the financial community.
- Use of insurance to address the financial risks of CCS demonstration plants

The IEA Clean Coal Centre (IEA CCC), IEA Greenhouse Gas R&D Programme (IEA GHG) and the World Coal Institute (WCI) have extensive global links and are in an excellent position to facilitate co-operation between leading research groups and industry on greenhouse gas (GHG) mitigation. IEA GHG already has experience in coordinating a number of international research networks. One option under consideration is the establishment of a new network to bring together existing expertise and experience of organizations at the forefront of research, development and demonstration into GHG mitigation technologies as well as financial institutions. To date, financial institutions have limited experience with CCS which was highlighted at the meeting with one speaker from the financial sector stating that his institution was not being asked to include CCS in the assessment of new coal fired plant in the USA. The objectives of this report are:

- 1. To pass on information about the CCS Expert Meeting on Finance;
- 2. Give an overview of each of the presentations, and
- 3. To outline the main outcomes of the meeting.

Day One Sessions

The meeting opened with a welcome by Barbara McKee of the US Department of Energy. Ms McKee highlighted the importance of CCS as a major contributor to mitigation of CO₂ emissions and pointed out that in many countries there were other issues to consider. These issues included electricity deprivation, scarcity of clean water and food and legitimate aspirations for economic improvement in the lives of those with low per capita incomes.

The meeting was divided into six parts. **Session One** was on the worldwide status of CCS given the importance of fossil fuels which currently supply 80% of the global energy demand with a further 60% growth in energy demand expected by 2030. CCS after energy efficiency is the second biggest potential mitigation option and will be a key transformational technology. There are many barriers to CCS deployment including technology development, cost, legal and regulatory, public acceptance, international mechanisms and making it commercial. If the barriers are removed CCS could change the way the energy industry operates with opportunities for innovators. However, if this is to be achieved it is important to recognize that it is vital to develop and deploy CCS to use fossil fuel resources sustainably.

Kelly Thambimuthu the Chairman of the IEA GHG said that CO₂ emissions are expected to grow an additional 14.3 Gt by 2030 with more than half of the growth coming from power stations in India and China. This presents a dilemma with energy demand growing and being met more and more by fossil fuels. The Intergovernmental Panel on Climate Change Fourth Assessment (IPCC AR4) also discusses how mitigation efforts over the next 2-3 decades will have a large impact on the potential to achieve lower stabilization levels. There is also the risk of "carbon lock" in with new and replacement fossil fuelled power plants 2003-2030 expected to be 1,391 GW for coal, 1,883 GW for gas and 237GW for oil. This means the next 10 years will be very critical as this technology will be locked in and producing CO₂ emissions for 30-40 years at least.

The status of CCS in terms of maturity differs with injection, storage and transport. Some parts of the cycle are well established in the oil and gas industry, for example CO₂ transport as part of enhanced oil recovery (EOR) operations. International policy developments have seen CCS being increasingly accepted with it now being considered for inclusion within the EU ETS from 2013. However, there are still barriers preventing the inclusion of CCS within the Clean Development Mechanism (CDM).

There is currently no large scale coal fired demonstration projects to accelerate deployment of CCS technologies. However, there are several proposed integrated CCS projects in Europe, USA, Canada, Australia and plans for a project in China. Lastly, the amount of money to be invested in the power sector including transmission and distribution networks up to 2030 is estimated to be over US\$11 trillion according to the IEA WEO 2007.

Jonathan Pershing from the WRI outlined four key points. Climate science is robust and the urgency to undertake large scale change is strong. There is no silver bullet, so we need to undertake all options. CCS is challenging in cost and public acceptability. Scaling up globally will be critical. Finally the policy needed to make all this work needs to be in place. In the USA, coal makes up over 30 % of the energy mix and it would be impossible to shut the existing coal fired stations down as they are critical to meet energy demand.

Session two examined national and regional initiatives with many countries building and moving forward on existing legal/regulatory frameworks taking into account onshore and offshore CO₂ injection including:

- Australia: based on Offshore Petroleum Act of 2006: ETS in 2010
- Canada: action at both Federal and Provincial level (Alberta and BC)
- United Kingdom: storage offshore; government taking long term liability
- Japan: storage offshore with Environmental Ministry responsibility
- Norway: building on existing offshore oil and gas regulations

Tom Wilson, a Senior Technical Leader at the Electrical Power Research Institute (EPRI) discussed CCS activities in the USA asking the key question of who is going to pay for early deployment of new CCS technology? Is it going to be Government, industry, or a combination? CCS is a critically important technology to the USA with both its large coal reserves and large potential for geological storage. However, in the USA the cost of coal along with other generation technologies has doubled since 2000. CCS retrofit is being considered and the Lieberman-Warner bill, if enacted, could produce CO₂ price and incentives sufficient to spur CCS deployment. To make CCS commercial by 2020 will require investment in the technology to start immediately.

Eric Beynon from the ICO2N Group discussed several CCS initiatives in Canada. ICO2N is made up of 18 companies representing many of the major potential CCS players. The companies in his group produce over 100Mt of CO₂ emissions annually or 15% of Canada's emissions. This includes 95% of oil tar sands emissions and greater than 60% of Alberta's energy emissions. In Canada, there is potential for 3,762 MtCO₂ to be stored in oil and gas reservoirs alone.

Initially, it is expected that CCS will begin in Western Canada. ICO2N has completed several economic analyses identifying CCS as a critical component of Canada's GHG reduction strategy in coal and the oil tar sands in the long term. There is currently 150 billion Canadian dollars earmarked for investment to utilize tar sands up to 2015. From a regional perspective, Alberta views CCS as a means to reduce its emissions by 60%.

Lawrence Bengal is from the Interstate Oil and Gas Compact Commission (IOGCC) presented his work with the IOGCC Task Force. The IOGCC is made up of 30 members, associate states and several international affiliates and a Task Force has produced a set of

guidelines on permitting CCS projects. The IOGCC Resource Management philosophy on CCS is:

- Given the regulatory complexities of CO₂ storage. The Task Force strongly believes that geologically stored CO₂ should be treated under resource management frameworks as opposed to waste disposal frameworks. These regulatory complexities include environmental protection, ownership and management of the pore space, maximization of storage capacity and long term liability.
- Regulating the storage of CO₂ under a waste management framework sidesteps the public role in both the creation of CO₂ and the mitigation of its release into the atmosphere and places the burden solely on industry to rid the "waste" from which an "innocent" public must be "protected".
- Such an approach lacking citizen buy-in with respect to responsibility for the problem as well as the solution could well doom geological storage to failure and diminish significantly the potential of geologic carbon storage to meaningfully mitigate the impact of CO₂ emissions on the global climate.

Kai Tullius from the European Commission (EC) gave an overview of CCS policy developments in Europe. The aim in Europe is to build 10-12 coal and gas CCS plants by 2015 which is estimated to cost between 10-20 billion euros. The long term policy goal is to make CCS commercially feasible by 2020. The current CCS directive is proposing an enabling framework with Member States determining whether and where CCS will happen and companies deciding whether to use CCS on the basis of conditions in the carbon market. At the moment CCS is not mandatory. The overall strategy from the European Union (EU) includes in the third phase from 2013 to have full auctioning of CO₂ certificates for the power sector and to include CCS.

Marc Levinson from JP Morgan Chase spoke on CCS and investment. His first comment was that this meeting and the discussions on financing CCS are premature from a private sector perspective. He pointed out that none of their clients had approached JP Morgan Chase about CCS and that in his view that this is unlikely to change in the next five years. If there are going to be any projects in the USA it is likely that the coal and gas companies will go first to the Government for funding, such as FutureGen. He went on to point out that any government subsidies would not be necessarily be positive for facilitating CCS. This could artificially allow CCS to sell low cost electricity and discourage renewables and other low carbon technologies. He then went on to outline what an investor would need to know before lending:

- How will lenders and investors get their money back? The state has to decide that the utility can recover the costs from the rate payer. It needs to be determined that the additional expenditure is "prudent".
- No lending or investing in CCS until the legal and regulatory uncertainty is sorted out such as pore ownership and liability of leakage.

• They will want to see financial engagement from suppliers to overcome technology risk. There needs to be more suppliers involved in CCS as this will increase investor confidence that these technologies will work.

The discussion and questions on this session focused on the JP Morgan Chase presentation. Several questions were asked on how JP Morgan Chase viewed the future for CCS. Mr Levinson made it clear that if the Government was going to rely on private funding without loan guarantees then CCS projects were unlikely to proceed. A question was asked about what a deal on CCS would have to look like for investors to come to the table. A suggestion was made – "would it assist if the commodity risk was taken out with a 20 year rate price on fuel in a rate regulated environment". Mr Levinson responded that a rate regulated market is one way to approach it and the other is to put a meaningful cost on carbon as in Europe. Basically CCS has no positive purpose, it only has a negative purpose to avoid another cost (putting CO₂ into the air) and currently this does not have a cost in the USA.

Session three discussed the financial industry and CCS. The session began with Mark Trexler from Ecosecurities Global Consulting Services presenting on the relationship between CCS and carbon markets and how they could assist in getting CCS off the ground. Several possible scenarios exist but the carbon market is complicated and not a typical commodity market with many variables including science, media and public opinion all influencing carbon credit price forecasting. Demand is based largely on policy decisions, on how strict the market is, and on how credits are defined. All of which are different from other commodity markets.

In order for CCS projects to proceed, it will need several elements in place including public acceptance, financial incentives, clarification of the permitting issues and demonstration projects to get underway as soon as possible. In order for CCS finance to be secured it will require subsidies and risk offloading. In the end, CCS is reliant on policy, expectations about policy and market demand. It is clear that the carbon market will not be a launch pad for CCS, more likely the carbon market will supply a cash flow.

Professor Edward Rubin argued that in an increasingly carbon constrained world, large reductions of CO₂ emissions from coal plants will be urgently needed and only CCS offers that reduction option. Deployment is needed to establish reliability and true cost of CCS in utility applications at commercial scale across different technologies, different types of coal (bituminous, sub-bit, lignite) and in different geological settings. To reduce costs, learning by doing and R&D is needed.

Professor Rubin then outlined a CCS Trust Fund option he is proposing funded by fees from the use of coal for power generation to pay the full additional cost of CCS for new coal fired plants. This option can raise large amounts of money via small fees. It also decouples the regulatory requirement to reduce CO₂ and can rapidly start deployment with well defined revenues. There are two reports on the Pew Centre website at www.pewclimate.org that give more details about the Trust Fund and further options to accelerate deployment of CCS.

Robert Sussman presented on proposals that could assist CCS. Until legislation in the USA is put in place clarifying the status of CCS there will remain uncertainty about the drivers and incentives amongst plant developers with it currently not in their economic interest to deploy CCS plants. One recently proposed climate change bill in the USA was the Lieberman-Warner Climate Security Act (S.2191) which could achieve emission reductions below 2005 levels of 17-19% by 2020, and 57-63% by 2050. It is a cap and trade program where sources that fall within the terms of the Act must hold allowances equal to their emissions. A key point is that US \$16 billion from auction revenues in the current Lieberman-Warner Bill would be made available for CCS projects. However, in the long term, cap and trade this is not enough to finance the wide scale deployment of CCS; additional incentives would be needed. One alternative approach that examined emissions trading could be linked to a performance standard requiring CCS for new plants plus a subsidy to close the cost gap from the revenues of auctioning allowances. The Bill was rejected but likely to be resubmitted at a later date.

Paul Zakkour presented on Financing CO₂ Infrastructure examining financial aspects of building CO₂ pipeline networks including backbone systems. His key messages were that:

- Integrated backbone pipeline networks may be most efficient long-term option but will need "guaranteed" capacity utilisation in order to be economically viable. Point-to-point pipelines on the other hand will be funded on a project-by-project basis by individual developers because of certainty over capacity utilisation.
- Public policy such as Government incentives, and loan guarantees will be needed to encourage development of optimised networks. In particular, Government support in first years when capacity is ramping up will be important for commercial viability

CO₂ pipeline projects, if they can be reduced in terms of carbon price risks, will become the same in terms of risks as any other oil & gas pipeline project. However, currently banks and financial institutions view such projects as having greater regulatory and market (carbon price) risks than oil and gas pipeline projects.

The audience asked several questions concerning the Trust Fund option, the Lieberman-Warner Bill that was being put forward and the political feasibility of the proposals. The panel responded that leadership has to come from countries that can implement CCS. The sooner CCS can be deployed and come down the learning curve it is likely the costs will come down as did with other technologies such as SO₂ control and NOx control.

Tom Kerr from the International Energy Agency (IEA) discussed the recently launched CCS International Regulatory Network on 13-14 May, 2008 and outlined what the IEA was doing in other areas of CCS including high-level recommendations for consideration at the G8 summit in Tokyo in June 2008.

Day Two Sessions and Discussion

Session four began with Preston Chiaro from Rio Tinto Energy present on the Hydrogen Energy Abu Dhabi project and Carson project. He explained that the Hydrogen Energy Company is jointly owned by BP and Rio Tinto and was established to supply low carbon hydrogen fuel to the power sector by using fossil fuels and carbon capture and storage. The Abu Dhabi project could be operational by 2012 and will sequester 1.7Mt CO₂ with EOR as the main economic driver. The Carson project has actually been relocated to Bakersfield in California. Both projects aim to generate hydrogen for power and other uses and to use the CO₂ for EOR.

Anthony Tarr, the CEO from the Zerogen project in Australia, stated that with their ratification of the Kyoto Protocol, the Australian government also created a large clean coal technology fund. He went on to describe the Zerogen project in Queensland that will use IGCC and CCS with aims to complete the feasibility study in 2009 and have an 82MW plant operational by 2012 and a 400MW plant operational by 2017. The storage component will be in a saline aquifer with a goal of 75% - 90% CO₂ capture.

Bruce Braine from American Electric Power (AEP) discussed their activities on CCS including a project in New Haven, West Virginia which will be the first CCS demonstration plant for AEP using chilled ammonia for CO₂ capture. AEP sees technology development and deployment as a critical issue. AEP is focusing on IGCC and ultra supercritical (USC) technologies with AEP first to announce two 600MW IGCC commercial scale plants. A new generation plant using ultra supercritical steam conditions is being built in Arkansas for the first time in the USA with a temperature above 1100F. AEP is looking at all capture techniques.

Gary Loop from Dakota Gas discussed the Dakota Gasification plant that his company operates and which supplies CO₂ to the Weyburn CO₂EOR project. These projects combine to form the largest capture and storage project in the world. 14 gasifiers operate to produce synthetic natural gas (SNG) or methane capturing 4.5 million tonnes of CO₂ and deliver 3 million tonnes of CO₂ per year for EOR operations in the Northern USA and Canada. To date, in Weyburn, Saskatchewan 13 million tonnes have been injected. The capture process costs in US\$8 per tonne of CO₂ (capital US\$4, O&M US\$4). To provide incentives for CCS a tax credit of \$15/ton CO₂ can stimulate sites to prove evolving technologies. A 30% investment tax credit for demonstration plant can stimulate sites as well.

Several questions were asked about the use of EOR. EOR can improve the amount of oil that can be recovered and with oil at \$130 barrel it makes EOR even more economically viable. EOR has positive revenue but other options need US\$20-30. Preston Chiaro pointed out these projects are long term investments and no one knows whether the price of oil will remain high. In addition, if CCS takes off then there will be a lot of CO₂ and thus high demand and a high CO₂ price may not be sustained for a long period.

Session five was a panel discussion on insurance and liability concerning CCS projects. The panel was moderated by Arthur Lee, Principal Advisor, Environment and Climate Change, Chevron Corporation. A presentation on risk and liability was given by Chiara Trabucchi a Principal at Industrial Economics. The Panel also included: Lindene Patton, Chief Climate Product Officer, Zurich Financial Services, Rick Hawkinberry, Senior Vice President, Willis Environmental Practice and Adrienne Atwell, Senior Vice President, Swiss Reinsurance America Corporation. Several questions were addressed in the session and they were:

What are the risks? What risks are insurable?

Adrienne Atwell discussed this from a life cycle viewpoint starting at the site selection then went on to the different phases such as operation, contamination by leakage, local environment damage and raised the link between surface leakage and removal of carbon credits and who is liable to make up any shortfall from a loss of containment. At the other end of the life-cycle is the post-closure phase and the risk of quantification or how much has been stored and who is liable in the long term. All the risks are insurable up to the post closure stage. Rick Hawkinberry added that there are several types of existing insurance to cover many aspects of the life cycle. However, the post-closure phase is the complicated issue as there is little actuarial data available currently to assess this risk. Adrienne Atwell said that the insurance industry needs to understand what you are insuring and what the risks are to be able to determine what is then insurable?

What does the insurance industry need in order to formulate insurance products for CCS projects?

Lindene Patton said that companies need to determine what business model is in play and whether it will be the utilities responsible for most of the project or whether parts will be sub contracted. The business model determines who bears the risk and what sort of risk is being structured. So every time a new party is inserted there is further contractual risk. It is insurable, but there are public policy decisions that will decide on how this will be managed. In terms of the Lieberman-Warner bill the insurance sector will send a price signals when the final structure is in place. The question to address is how to get projects off the ground and once completed what happens with the future liability?

What kind of policy environment is needed to develop these insurance products?

There is currently a lack of regulatory framework in the USA and this will influence the development and design of insurance products. Because of a lack of actuarial data, this type of insurance for CCS technology is specialty coverage. This could in the USA create anti-trust issues as there may only be a limited number of insurance companies willing to cover the risk. There is also the issue that company will not provide insurance, is it worth proceeding? A further issue is that if the Government meets any long term liability issues price it would send the wrong investment signals to companies investing in CCS as there would be no risk to them. The Panel pointed out this is the wrong message to send to

companies as it creates a false sense of security and courts may overturn this at a future date.

The final session of the day covered investment in CCS. Ross Willims, Chairman of the Australian Coal Association Low Emissions Technology Ltd (ACALET) spoke about the CCS activities that the Australian Coal Association undertakes in Australia. This work programme is called the Coal21 action plan with support from a voluntary fund provide from a levy on Australian coal production. It is estimated that the levy will over 10 years raise around A\$1 billion.

There are several projects being supported by the fund involving oxy-fuel research, IGCC Zerogen, PCC-CSIRO post combustion capture project and the Otway project by CO2CRC as well as regional storage assessments in Queensland and New South Wales. There are several key elements for success that include a robust political framework with support, effective collaboration, clear goal to aim for a commercial plant, financial incentives including emissions trading and supporting regulation. In Australia CCS is moving forward on clean coal technologies but it is just the beginning and decades of work will be needed.

Mark Taylor from New Energy Finance started by highlighting that there are 65 CCS projects announced worldwide with total costs exceeding \$42 billion and they could, by 2016, cumulatively inject around 67 MtCO₂/yr. This figure represents a 0.25% reduction in annual CO₂ emissions from global fossil fuel usage.

Due to the need to build investor confidence, the first commercial scale plant is likely to be the catalyst to get several built. One commercial scale project would determine the actual cost for a project, contribute to public acceptance, help refine regulatory definitions, help prove technical feasibility and lastly contribute to investor confidence.

Andrew Paterson from Econergy said to finance large scale projects will need more than the carbon market and that the bond market is needed to make progress. In the USA, 15GW of coal plant is under construction, none of which include CCS. There are several challenges still to overcome for CCS in the USA and they are:

- 1. Retail electricity competition and merchant power mostly failed in the USA, with major bankruptcies and many states remain committed to rate regulation.
- 2. Consumers do not buy electricity based on price, anyway; it is an essential good and many utilities mask the signals.
- 3. New electricity supply is heavily constrained due to natural resource limits (wind, sunlight) and regulations no matter the option.
- 4. Energy efficiency and demand side management can help, but are not sufficient with growth and cannot replace a lot of "old coal" units.
- 5. USA regional differences in electricity fuel mix, prices, and access to renewable resources are severe.
- 6. "Urgent" cap and trade (2012, 2020) in the EU is a mixed bag: emissions are not lower, and other measures (feed-in tariffs, regulations, direct subsidies, local tax policy) are in the mix.

7. Because of a huge USA budget deficit and national debt, federal fiscal options are limited and need risk-based incentives.

The key financial market for CCS is the bond market in the USA which is around US\$30 trillion and which annually issues US\$6-7 trillion in new bonds of which US\$80-100 billion is for power providers. With dependence in the USA on coal-based electricity (50% of supply), CCS is vital to reducing carbon emissions. It is also clear that CCS is not economic and subsidies will be needed for the first plants. Finally, financing is the key and ultimately without financing there will be no CCS deployment.

A question was asked on what length of time would there needed for bond markets to fund CCS projects? Andrew Paterson responded that it will depend on how much it will cost the consumers. A longer term cap up to 2040 would engage the bond market but also have a very long term pathway.

Conclusions

Preston Chiaro the Chairman thanked the speakers and the World Coal Institute, IEA CCC and IEA GHG for organizing the meeting and Chevron for sponsoring. He said it was interesting to see how the discussion had matured since the meeting in London last year. It is important to recognize that there has been progress, but a lot is still needed to establish CCS projects built in terms of regulations, insurance and practical experience in stakeholders operating CCS plants.

It is also important to note that while there has been considerable work and interest in CCS. There are also a lot of players ready to move forward but there is a need for urgency and direction from Governments. Policy and regulatory regimes are still uncertain and CCS is largely unknown to policy analysts, planners, politicians, the general public and this is something that will need to be addressed. In particular, Governments will need to provide financial support for the first CCS projects.

In order to move forward Governments will also need to have robust CCS policies that provide certainty to investors and allow for the deployment of CCS projects. We need to keep our options open and not to select a winner as we do not know what will be the final answer.



2nd Expert Meeting on Financing CO₂ Capture and Storage Projects

28th-29th May 2008 New York, USA

Organised by

IEA Greenhouse Gas R&D Programme
IEA Clean Coal Centre
World Coal Institute

Sponsored by Chevron





28th May 2008 Day 1 08.30 Registration opens

Session 1:The Worldwide Status of CCS: Chair Preston Chiaro, Chief Executive Energy and Minerals, Rio Tinto Energy and Chairman, World Coal Institute

- 09.00 to 09.15 Welcome by Barbara McKee, Director, Office of Clean Energy Collaboration, US DOE
- 09.15 to 09.35 Opening Address: The Status of CCS Internationally and Issues surrounding CCS Projects: Kelly Thambimuthu, Chairman of IEA GHG R&D Programme
- 09.35 to 09.55 WRI Perspectives on CCS: Jonathan Pershing, World Resource Institute
- 09.55 to 10.10 Question and Answer: Chaired by Preston Chiaro

10.10 to 10.30 Break

Session 2:National and Regional Initiatives: Chair Barbara McKee, Director of Clean Energy, US DOE Questions to address: What is driving National Governments with CCS? Are there lessons to apply from Europe to North America and vice versa

- 10.30 to 10.50 The Role, Status and Financing of CCS as a Mitigation Option in the United States: Tom Wilson, Senior Technical Leader, Electric Power Research Institute
- 10.50 to 11.10 Canadian Perspective on Financing CCS: Eric Beynon, ICO2N Group
- 11.10 to 11.30 The IOGCC Guidelines on Permitting CCS: Lawrence Bengal, IOGCC
- 11.30 to 11.50 CCS Projects in Europe and the Issue of Finance: Kai Tullius, Project Officer, European Commission
- 11.50 to 12.30 Panel Discussion by Speakers: Chaired by Barbara McKee

12.30 to 14.00 Lunch Sponsored by Chevron

Session 3: Financial Industry and CCS: Chair Milton Catelin, Chief Executive, World Coal Institute Questions to Address: What financial options are available for CCS projects? Have any banks provided finance for CCS projects?

- 14.00 to 14.20 How Investors Look at CCS: Marc Levinson, JP Morgan Chase
- 14.20 to 14.40 Will Future Carbon Prices Make CCS a Viable Mitigation Option, and what are the Key Factors Going into Answering this Question?: Mark Trexler, Director, Ecosecurities Global Consulting Services.
- 14.40 to 15.00 A Trust Fund Approach for Accelerating the Demonstration and Adoption of CCS: Edward Rubin, Director, Center for Energy and Environmental Studies, Carnegie Mellon

15.00 to 15.20 Break

- 15.20 to 15.40 Treatment of CCS in emissions trading schemes methodological issues Robert Sussman, Senior Fellow,

 Centre for American Progress
- 15.40 to 16.00 Financing CO₂ Infrastructure: Paul Zakkour, Principal Consultant, ERM
- 16.00 to 17.20 Panel Discussion: Chair Milton Catelin
- 17.20 to 17.30 CCS Regulatory Issues: Tom Kerr, IEA

Close Day 1

18.30 Reception and Dinner in the Gramercy Park room of the New Yorker Sponsored by WCI

29th May 2007 Day 2

Session 4: Project Developers and CCS: Chair John Topper, Managing Director, EPL

Questions to address: What Financial Incentives do Project Developers Need to Accelerate CCS projects? How is the US Developing CCS Projects? What Lessons have been Learnt from CCS project Developing thus far?

08.30 to 08.50 Abu Dhabi and Carson and the Commercial Aspects of Making it Work and What is Needed from Governments: Preston Chiaro, Chief Executive Energy and Minerals, Rio Tinto Energy and Chairman, WCI

08.50 to 09.10 Challenges for Early Movers - The ZeroGen Experience: Anthony Tarr, CEO, ZeroGen

09.10 to 09.30 AEP and CCS: Bruce Braine, AEP

09.30 to 09.50 Ongoing CO₂ Capital and Transport Costs: Gary Loop, Senior VP and Chief Operating Officer, Dakota Gas

09.50 to 10.20 Panel discussion by Speakers: Chair John Topper

10.20 to 10.40 Break

Session 5: Insurance and Liability Related to CCS Projects: Chair Arthur Lee, Principal Advisor, Chevron Questions to address: Can the insurance industry provide risk options for CCS? What frameworks are currently being used to address liability risks?

10.40 to 10.55 Risk and Liability Overview: Terminology, CCS Uncertainty in Different Parts of the CCS Lifecycle, and Past Industry Experience. Chiara Trabucchi, Principal, Industrial Economics

10.55 to 11.10 Introduction of Panel:

Lindene Patton, Chief Climate Product Officer, Zurich Financial Services Rick Hawkinberry, Senior Vice President, Willis Environmental Practice Adrienne Atwell, Senior Vice President, Swiss Reinsurance America Corporation Chiara Trabucchi, Principal, Industrial Economics

11.10 to 12.30 Panel Discussion of Speakers: Chair Arthur Lee

12.30 to 14.00 Lunch Sponsored by Chevron

Session 6: Investment in CCS: Chair John Gale, General Manager, IEA GHG Questions to address: What are green investors looking for and how does that fit with CCS?

14.00 to 14.20 Coal Technology Investment Developments and Issues Concerning CCS in Australia Ross Willims, Chairman, Australian Coal Association Low Emissions Technologies Ltd (ACALET)

14.20 to 14.40 The Carbon Principles Initiative, and Raising Capital for Large Energy Projects and How this Relates to CCS: Eric Fornell, JP Morgan Chase

14.40 to 15.00 Investment in CCS: Mark Taylor, Associate, New Energy Finance

15.00 to 15.20 Break

15.20 to 16.15 Panel Discussion: Chair John Gale

16.15 to 16.30 Wrap up: Preston Chiaro

Close

2nd Expert Meeting on Financing CO2 Capture and Storage Projects

28th-29th May 2008, New York, USA

| Mr William Ellison | Arch Coal | Mr Andrew Paterson | ECONERGY International |
|---------------------|--|---------------------------------|------------------------------------|
| | | | |
| Mr Malcolm Anderson | Southern California Edison | Mrs Lindene Patton | Zurich Financial Services |
| Ms Adrienne Atwell | Swiss Re Financial Services | Dr Jonathan Pershing | World Resources Institute |
| Mr Julian Beere | BHP Billiton | Mr Stan Pillay | Anglo Coal |
| Mr Brendan Beck | IEA Greenhouse Gas R&D Programme | Mrs Alexandrina Platonova-Oquab | The World Bank, Carbon Finance |
| Mr Lawrence Bengal | Arkansas Oil and Gas Commission | Mr Jeffrey Price | Bluewave Resources, LLC |
| Mr Eric Beynon | Integrated CO2 Network (ICO2N) | Mr Wishart Robson | Nexen Inc. |
| Mr Bruce Braine | American Electric Power (AEP) | Dr Edward Rubin | Carnegie Mellon University |
| Mr Mark Brownstein | Environmental Defense Fund | Mr Mark Saunders | Shell International Ltd |
| Mr James Bryant | Energy Futures Network Ltd. | Miss Stephanie Saunier | Schlumberger Carbon Services |
| Mr Benjamin Court | Princeton University CEE dept | Mr Emily Schlect | National Mining Association |
| Ms Lisa Campbell | Environmental Resources Management | Mr Bruce Schlein | Citigroup |
| Mr Milton Catelin | World Coal Institiute | Dr Norman Shilling | GE Energy |
| Mr Preston Chiaro | Rio Tinto plc | Mr Stephens Skip | Joy Global |
| Mr Kipp Coddington | Alston & Bird LLP | Mr Max Slee | Clinton Foundation |
| Mr John Eaves | Arch Coal | Mr Andrew Stevenson | National Resource Defense Council |
| Mr Don Elder | Solid Energy | Mr Bob Stobbs | Canadian Clean Power Coalition |
| Ms Sarah Eastabrook | Alstom Power Systems | Mr Scott Stone | Hunton & Williams LLP |
| Mr Darrick Eugene | Texas Carbon Capture and Storage Association | Mr Anthony Tarr | ZeroGen Pty Ltd |
| Mr Eric Fornell | J.P. Morgan Securities Inc. | Mr Mark Taylor | New Energy Finance |
| Mr John Gale | IEA Greenhouse Gas R&D Programme | Dr Kelly Thambimuthu | Centre for Low Emission Technology |
| | | | |

Mr Frank Tierney

AEGIS Insurance Services Inc

Mr Michael Hamilton

MIT Energy Initiative

IEA Greenhouse Gas R&D Programme Mr Rick Hawkinberry Willis North America, Environmental Practice Mr John Topper Mr Michael Parker ExxonMobil Production Company Ms Chiara Trabucchi **Industrial Economics** Mr David Hunter IETA Dr Mark Trexler EcoSecurities **European Commission** Mr Tommy Johnson CONSOL ENERGY INC Mr Kai Tullius Mr Glenn Kellow **BHP Billiton** Mr John Wallington Anglo Coal Mr Thomas Kerr International Energy Agency Mr Roger Wicks Anglo Coal Mr John Kessels **IEA Clean Coal Centre** Mr Ross Willims BHP Billiton Mitsubishi Alliance Mr Peter Lilly CONSOL ENERGY INC Ms Sarah Wade AJW, Inc **Chevron Corporation** Mr Luke Warren World Coal Institute Mr Arthur Lee Mr Marc Levinson JPMorgan Chase & Co. Mr Colin Whyte Xstrata Coal Dr Thomas Wilson Mr Gary Loop **Dakota Gasification Comapny** Electric Power Research Institute **CONSOL ENERGY INC** Mrs Trina Mallik The Climate Group Mr Steve Winberg Mrs Ffiona McDonough Dewey & LeBoeuf LLP Coal Association of Canada Mr Allen Wright U.S. Department of Energy Mr Fernando Zancan **Brazilian Coal Association** Ms Barbara McKee Mr Alexandrina Zapantis Miss Katie Mills World Coal Institute Rio Tinto plc Mr Kraig Naasz **National Mining Association** Mr Muttasif Zaidi Deutsche Asset Management Mr Niall O'Dea **Environment Canada** Dr Paul Zakkour **ERM** Mr William Ellison **POWER Magazine** Dr Kourosh Zanganeh Natural Resources Canada Mr Thomas Alttmeyer Arch Coal Mr Muttasif Zaidi Deutsche Asset Management **Hunton & Williams LLP** Mr Jim Butcher Morgan Stanley Mr Scott Stone



Presentation to:
Expert Meeting on
Financing Carbon Capture and Storage



Barbara N. McKee, Director, Office of Clean Energy Collaboration US Department of Energy

New York, New York May 28, 2008

The International Energy Agency (IEA)

- The IEA is an autonomous agency linked with the Organization for Economic Cooperation and Development (OECD).
- IEA Objectives:
 - Maintain and improve systems for coping with oil supply disruptions;
 - Promote rational energy policies in a global context;
 - Operate a permanent information system on the international oil market;
 - Improve the world's energy supply and demand structure;
 - Assist in the integration of environmental and energy policies.
- The IEA has 26 Member Countries.
- The work of the IEA is implemented through Standing Groups,
 Committees and Working Parties composed of member delegates.
- Working Party on Fossil Fuels advises IEA on fossil energy related trends and carries out collaborative activities.

Workshop Sponsors











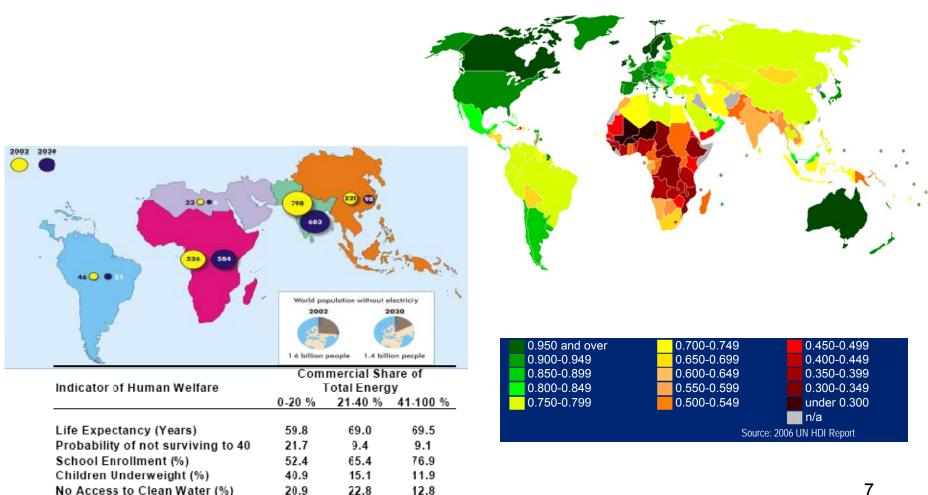
"Failure is not an option."



Energy enables modern life.



Without affordable energy, life is difficult.



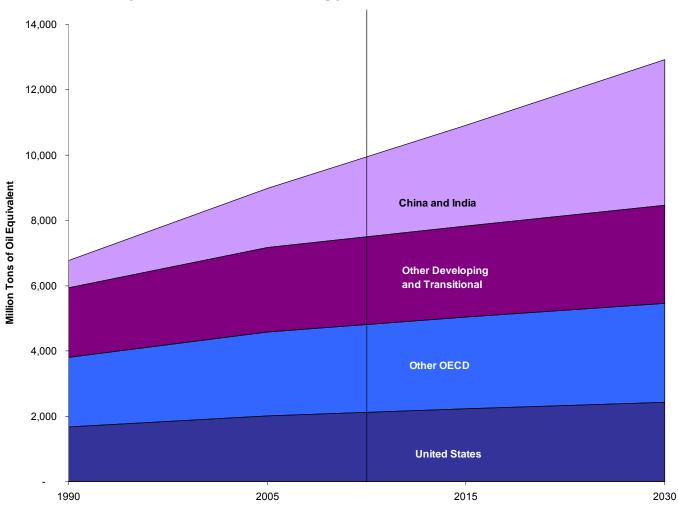
No Access to Clean Water (%)

20.9

Source: IEA World Energy Outlook

Fossil energy use is expected to grow.

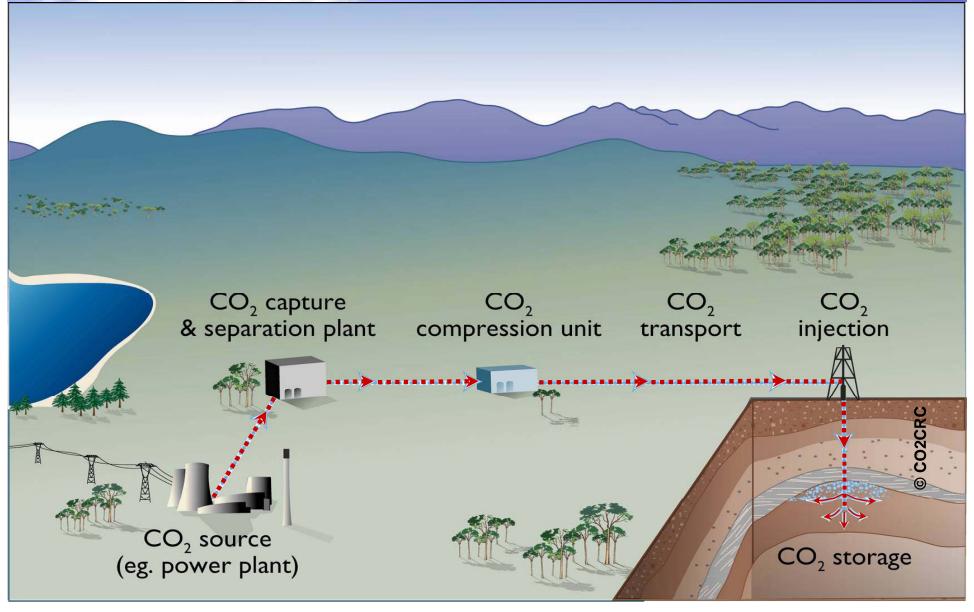
Projected Fossil Energy Consumption (1990-2030)



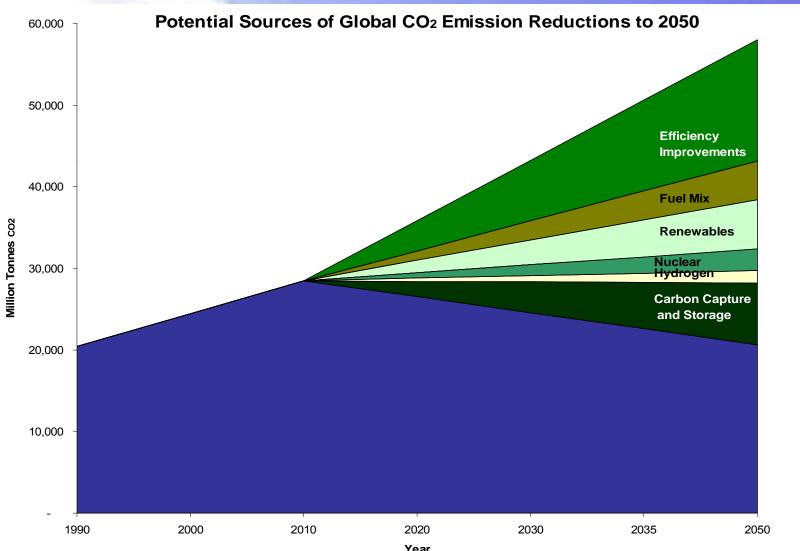
Source: International Energy Agency, World Energy Outlook 2007

8

Carbon Capture and Storage (CCS): A transformational technology.



CCS: Critical "wedge" in climate stabilization, affordable energy and energy security.



10

Barriers to CCS Deployment

Technology Development















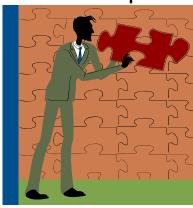


CCS: transformation creates opportunities.

Creating the new technology standard.



Fitting together the the business puzzle.



Executing innovative financing strategies.







The status of CCS and issues surrounding CCS projects

Kelly Thambimuthu
Chairman
IEA Greenhouse Gas R&D Programme

Financing CCS - May 28th 2008



Overview

- IEA Greenhouse Gas R&D Program
- Energy Demand and Global Warming
- Fossil Fuel Consumption and Carbon Lock-in
- CCS, its Role and Technology Status
- CCS Policy and Regulation
- Current and Future CCS Projects
- Next Steps in Financing CCS



IEA Greenhouse Gas R&D Programme

- A collaborative research programme involving governments, industry and other bodies founded in 1991
- Aim is to:

Provide members with information on the role that technology can play in reducing greenhouse gas emissions.

- Funding approximately \$2.5 million/year.
- Activities:- technical studies (>100), international research networks, facilitating and focussing R&D and demonstration activities
- Producing information that is:
 - Objective, trustworthy, independent
 - Policy relevant but NOT policy prescriptive
 - Reviewed by external Expert Reviewers
 - Subject to review of policy implications by members

RWE

IEA Greenhouse Gas R&D Programme

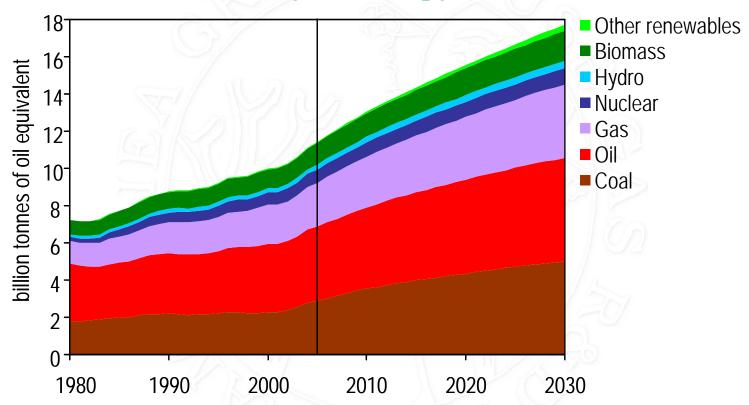




TOTAL

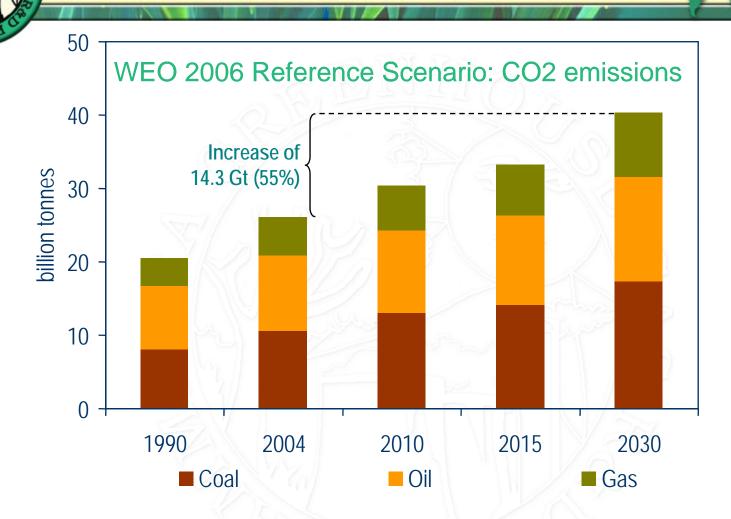


WEO 2007 Reference Scenario: World Primary Energy Demand



Global demand grows by more than half over the next quarter of a century, with coal use rising most in absolute terms

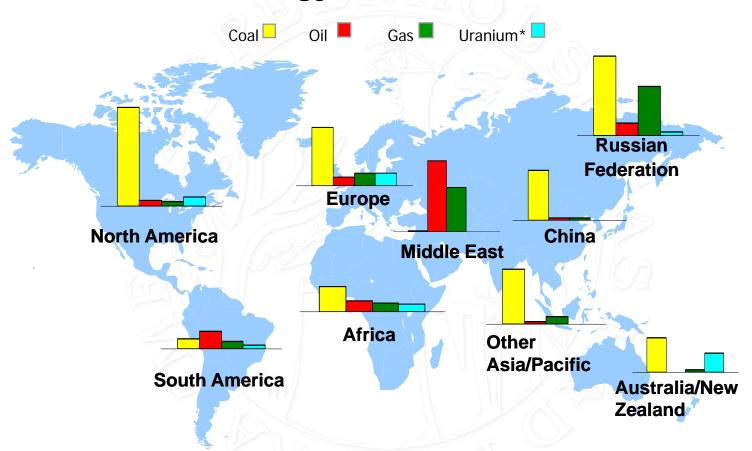




Half of the projected increase in emissions comes from new power stations, mainly using coal & mainly located in China & India



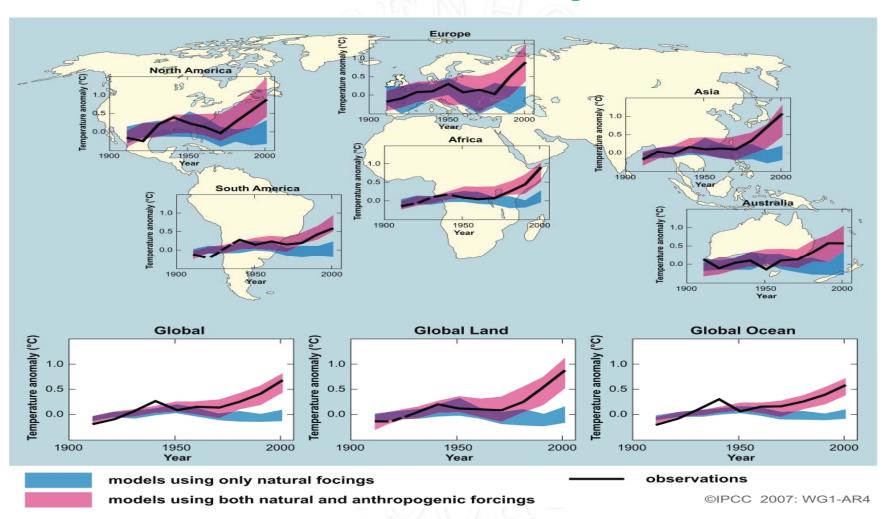
How much energy is left in the world?



Sources: BP Statistical Review 2005; WEC Survey of Energy Resources 2001; Reasonably Assured Sources plus inferred resources to US\$80/kg U 1/1/03 from OECD NEA & IAEA Uranium 2003; Resources, Production & Demand updated 2005; *energy equivalence of uranium assumed to be ~20,000 times that of coal



Global warming





Predicted Future Global Warming

Characteristics of stabilization scenarios

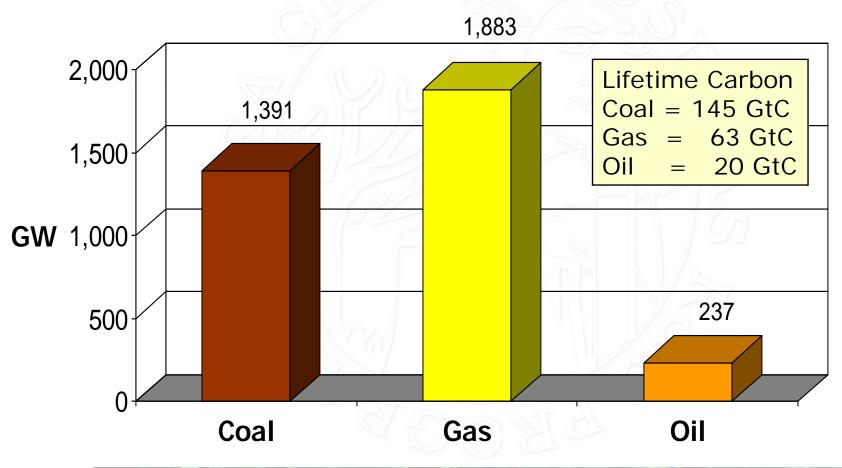
| Stabilization level (ppm CO ₂ -eq) | Global mean temp. increase at equilibrium (°C) | Year CO ₂ needs to peak | Year CO ₂ emissions back at 2000 level | Reduction in 2050 CO ₂ emissions compared to 2000 |
|---|---|---------------------------------------|--|--|
| 445 – 490 | 2.0 – 2.4 | 2000 - 2015 | 2000- 2030 | -85 to -50 |
| 490 – 535 | 2.4 – 2.8 | 2000 - 2020 | 2000- 2040 | -60 to -30 |
| 535 – 590 | 2.8 – 3.2 | 2010 - 2030 | 2020- 2060 | -30 to +5 |
| 590 – 710 | 3.2 – 4.0 | 2020 - 2060 | 2050- 2100 | +10 to +60 |
| 710 – 855 | 4.0 – 4.9 | 2050 - 2080 | | +25 to +85 |
| 855 – 1130 | 4.9 – 6.1 | 2060 - 2090 | | +90 to +140 |

Mitigation efforts over the next 2-3 decades will have a large impact on opportunities to achieve lower stabilization levels

Source: IPCC 2007



Carbon Lock-in - New and replacement fossil fueled power plants 2003-2030





World Energy Outlook 2007 summary

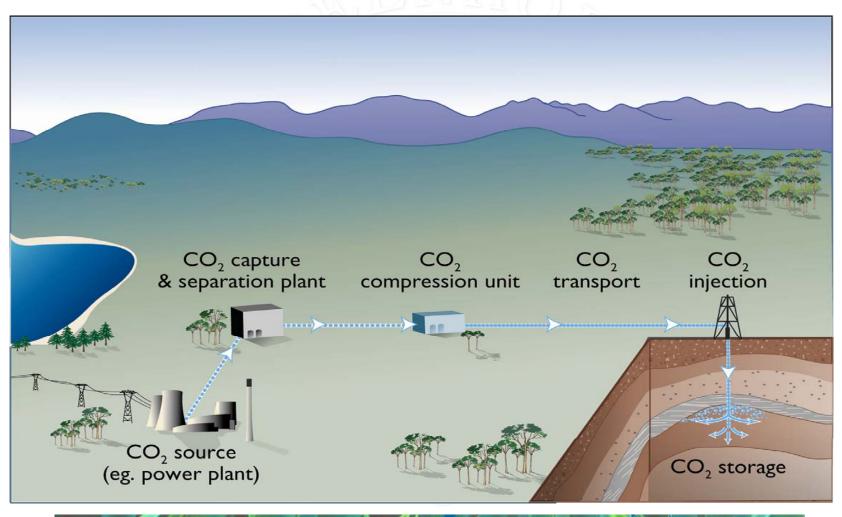
- Global energy system is on an increasingly unsustainable path
- China and India are transforming the global energy system by their sheer size
- Challenge for all countries is to achieve transition to a more secure, lower carbon energy system
- New policies now under consideration could make a major contribution

Next 10 years are critical

- The pace of capacity additions will be most rapid
- Technology will be "locked-in" for decades
- Growing tightness in oil & gas markets



CCS technology components





Maturity of CCS technology

Oxyfuel combustion

Post-combustion

Pre-combustion

Industrial separation

Mineral carbonation

Ocean storage

Research

phase

Enhanced Coal Bed Methane

Demonstration phase

Gas and oil fields

Saline formations

Economically feasible under specific conditions

Industrial utilization

Transport

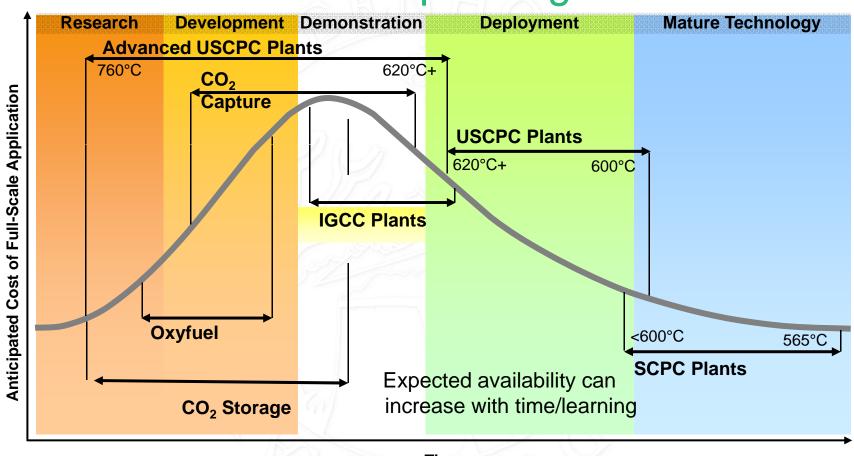
Enhanced Oil Recovery

Mature market

IPCC CCS 2005



CCS in coal-fired power generation



Time

Not all technologies at the same level of maturity.

After EPRI and others



Role of CCS in climate change mitigation

- IPCC Special Report (2005) CCS contributing between 15-55% of CO2 mitigation to 2100 and reduces mitigation costs by >30%
- IEA Technology Perspectives (2006) CCS 20-28% of mitigation to 2050. Second only to energy efficiency.
- Stern Report (2006) CCS ~10% mitigation by 2025,
 ~20% by 2050. Marginal mitigation costs without CCS increase by ~60%.
- EC (2008) Cost of meeting climate change commitments to 2030 will be 40% higher if CCS is not included.

WWW josaroon ora uk



International Policy Developments

- International acceptance of CCS was seen as a major barrier to CCS deployment 2 years ago
- Situation has changed significantly in the last year
- Main International Environmental Treaty is the Kyoto **Protocol**
 - CCS accepted as a mitigation option in 2007
- Key International Marine Treaties, London Convention/OSPAR adopted amendments to allow CCS in sub sea geological structures
- EU Emissions Trading Scheme permits CCS with full acceptance planned from 2013

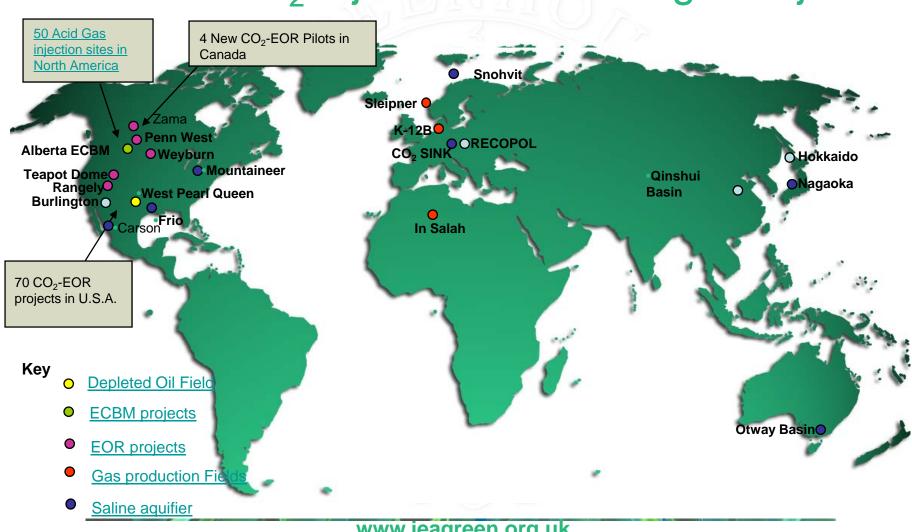


Development of CCS regulations

- USA Existing Underground Injection Control programme for ground water protection adapted for pilot projects
 - Interstate Oil and Gas Compact Commission has developed recommendations for regulations for CO₂ storage at a State Level
 - USEPA are developing Federal level regulations for CO₂ storage
- Australia
 - Adapting Federal oil and gas laws, draft regulations for comment
 - State of Victoria has a consultation document for CCS, considering regulations
 - Queensland considering regulations
- Canada
 - Canada acid gas injection and CO2-EOR already permitted in states like Alberta
 - Federal Task Force developing CCS regulations
- Japan
 - Adapted marine laws but has no oil and gas laws to adopt for CCS
- Most existing laws cover; permitting, construction, operational and abandonment phases but NOT post closure



Current CO₂ Injection and Storage Projects

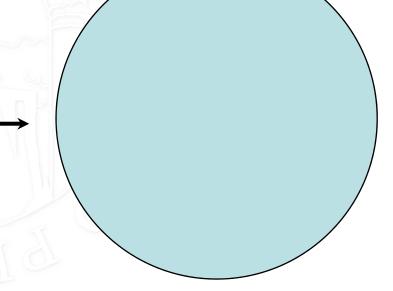




Size matters!

Cumulative globally sequestered CO₂

Cumulative global need to sequester CO₂



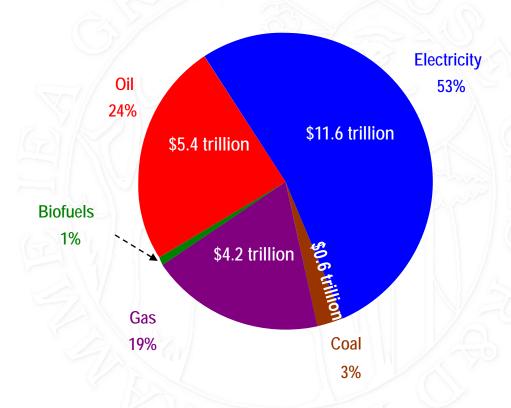


Proposed Integrated CCS Projects





IEA WEO 2007 Reference Scenario: Cumulative Investment, 2006-2030



Total investment = \$21.9 trillion (in \$2006)



CCS Commercialization

- Too few large scale demonstrations to accelerate deployment of CCS technologies
- This approach could result in risk of project failure
- High profile failures concerning CCS projects will result in a reluctance to invest in the deployment of CCS technologies
- We need a path forward to rapid commercialisation of CCS



Thank You!

Kelly Thambimuthu IEA Greenhouse Gas R&D Programme

Financing CCS - May 28th 2008



Recent Project Developments in US......

- Reconfigured FutureGen
- Hydrogen Energy DF2
- USDOE Regional Carbon Sequestration Partnerships
 - 7 pilot to demonstration scale CCS projects
 - Storing between 1Mt and 5Mt of CO2
 - 21.9Mt stored total of CO2
 - Up to 5Mt CO2 stored/year total



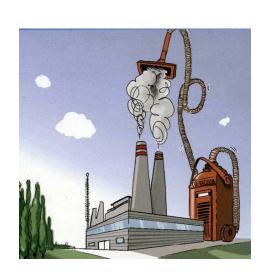
Recent Project Developments in EU......

- UK
 - CCS demo full scale, coal, post-combustion, offshore storage
- Germany
 - Ketzin injection
 - RWE planning a 450 MWe coal fired IGCC project with on-shore storage
 - Vattenfall have built a 30 MW CO2 capture pilot plant
 - Plans to build a 300MW demonstration project in Germany
 - EON and Siemens CO2 capture pilot plant
- France
 - Lacq Project. Total. 2008. Oxyfuel. 150kt CO2 aquifer. 27km pipeline
- Netherlands
 - CO2 injection into K12B field
 - NUON _ IGCC CO2 capture

THE CONTRIBUTION OF CCS

Expert Workshop on Financing Carbon Capture and Storage (CCS) May 28, 2008 New Yorker Hotel New York





Conclusions First

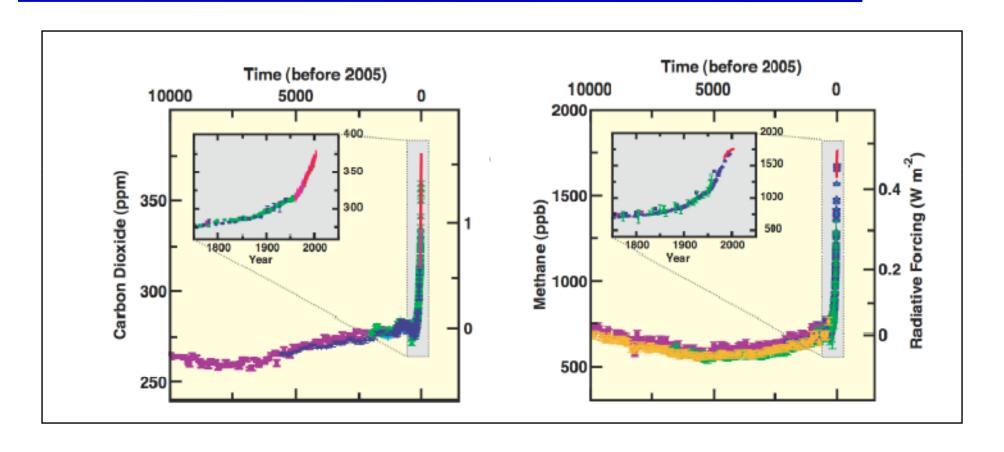
- Climate science is robust: it indicates a need for urgent and very large scale change
- A portfolio of actions will be necessary: we do not have the luxury of dismissing any promising mitigation options
- CCS will be part of the policy set: overcoming challenges of cost, gaining public acceptability, and scaling globally will be critical
- Policy will be needed to meet these challenges



Climate science is robust



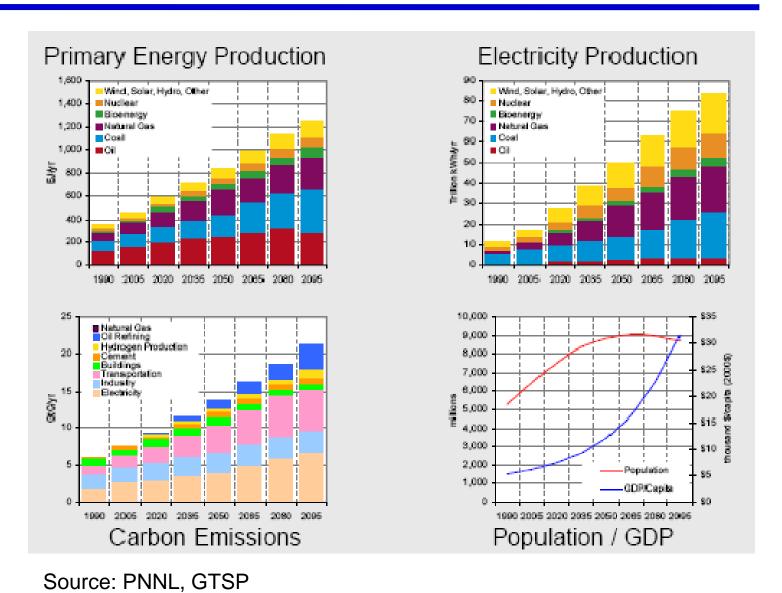
Change in GHG Concentrations



Source: IPCC, AR4



The global energy system





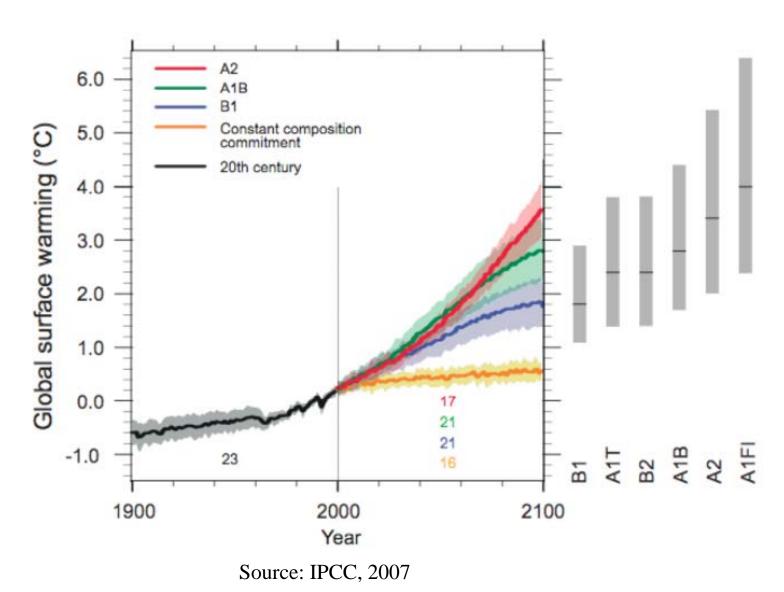
U.S. Carbon Dioxide Emissions

(Million Metric Tons)

| | Coal- Fueled Power Plants | Electric Power | Total U.S. CO2 Emissions |
|------|------------------------------------|-------------------|--------------------------------|
| 2005 | 1,944 | 2,375 | 5,945 |
| 2015 | 2,203 | 2,677 | 6,589 |
| 2030 | 2,927 | 3,338 | 7,950 |

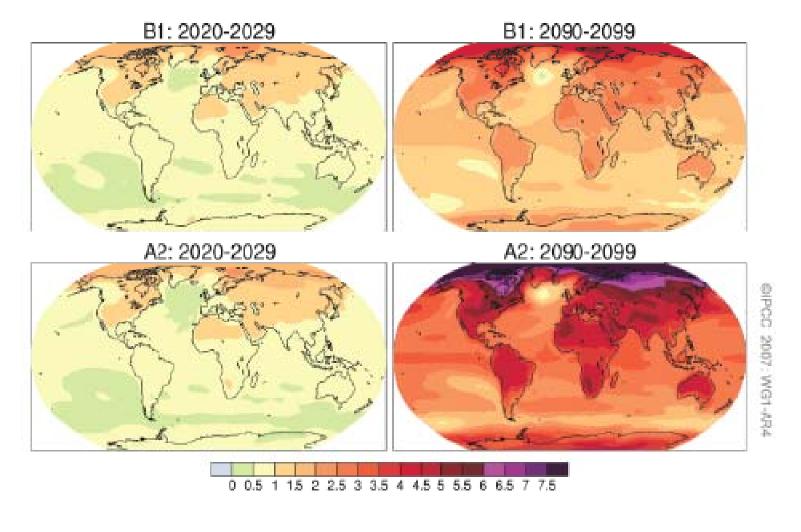
Source: USEIA, Reference Case, 2007

Projected future temperature





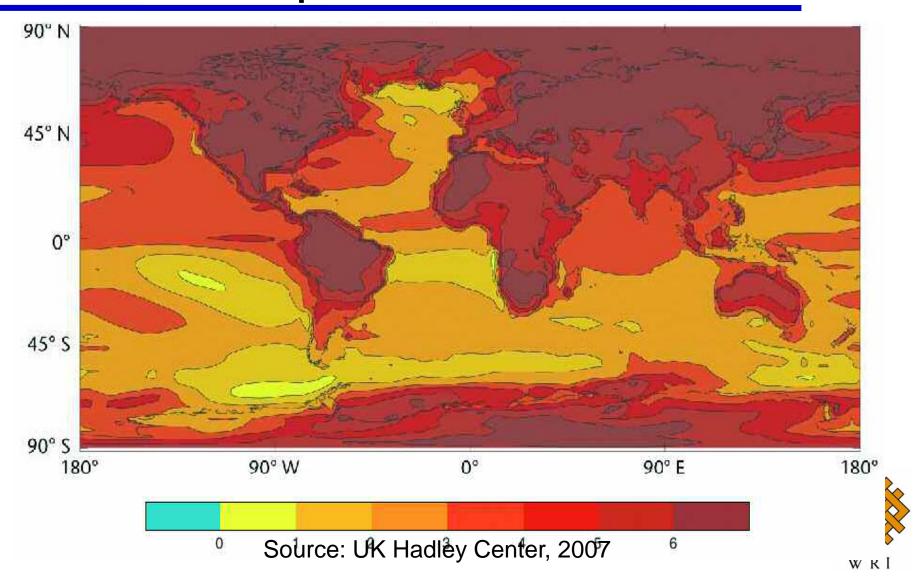
Projections of Surface Temperature



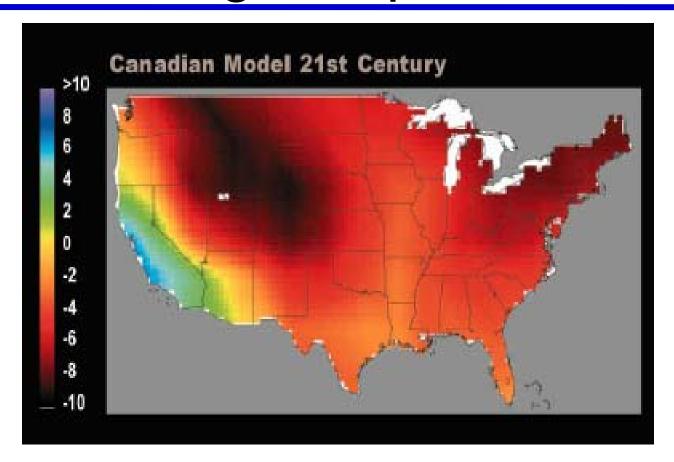




We are on the A1 FI Path: Temperature in 2080

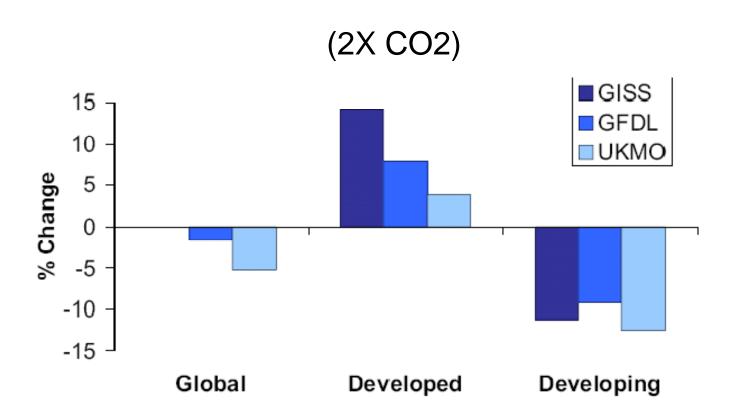


Drought Expectations



The Palmer Index is most effective in determining long term drought—a matter of several months—and is not as good with short-term forecasts (a matter of weeks). It uses a 0 as normal, and drought is shown in terms of minus numbers; for example, minus 2 is moderate drought, minus 3 is severe drought, and minus 4 is extreme drought.

Change in Cereal Production



Source: Stern Report, 2006



Food Riots

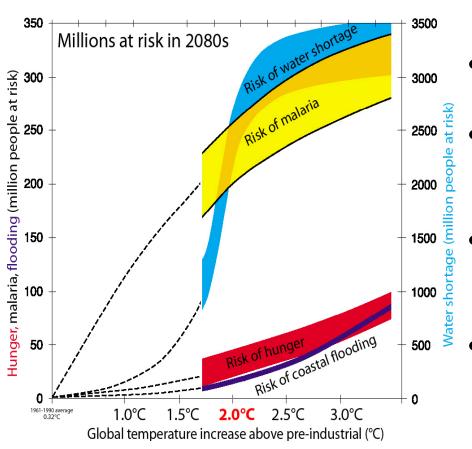


The World Bank estimates world food prices have risen 80 percent over the last three years and that at least thirty-three countries face social unrest as a result.

In recent weeks, food riots have erupted in Haiti, Niger, Senegal, Cameroon and Burkina Faso; protests have flared in Morocco, Mauritania, Ivory Coast, Egypt, Mexico and Yemen.



Risks from Global Warming



Source: Parry (2001), and IPCC WG 2, April 2007

- Water shortages harm up to 250 million in Africa by 2020
- Certain agriculture yields in Africa may fall 50% by 2050
- Decreased availability of fresh water in Asia might effect more than a billion people by 2050.
- Some areas of Europe are projected to lose up to 60% of their species by 2080.
 - The Americas will see reduced snowpacks, leading to water supply problems by 2020

Targets: The IPCC

| CO ₂ Concentration at Stabilisation (2005=379 ppm) | CO2-equivalent Concentration at Stabilization (includes aerosols; 2005=375 ppm) | Year in which global emissions peak | Global average temperature above pre- equilibrium | Change in global CO2 emissions in 2050 (% of 2000 emissions) |
|---|---|--|---|--|
| 350 – 400 | 445 – 490 | 2000 – 2015 | 2 - 2.4 °C | -85 to -50 |
| 440 – 485 | 535 – 590 | 2010 – 2030 | 2.8 - 3.2 °C | -30 to +5 |
| 570 – 660 | 710 – 855 | 2050 – 2080 | 4 - 4.9 °C | +25 to +85 |

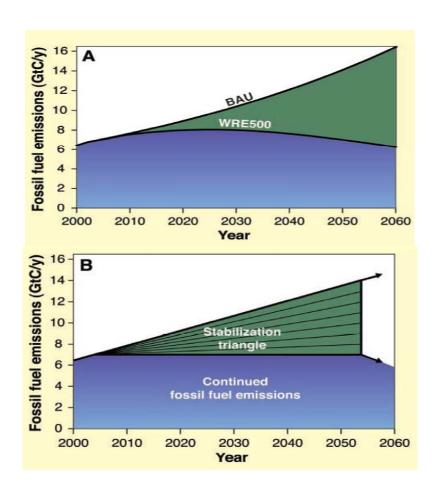
| Scenario category | Region | 2020 | 2050 |
|--|-------------|---|--|
| A-450 ppm CO ₂ -eq ^b | Annex I | –25% to –40% | -80% to -95% |
| | Non-Annex I | Substantial deviation from baseline in Latin America, Middle East, East Asia and Centrally-Planned Asia | Substantial deviation from baseline in all regions |
| B-550 ppm CO ₂ -eq | Annex I | -10% to -30% | -40% to -90% |
| | Non-Annex I | Deviation from baseline in Latin America and Middle East, East Asia | Deviation from baseline in most regions, especially in Latin America and Middle East |

Source: IPCC AR4 WRI

A portfolio of actions will be necessary



Technology Opportunities

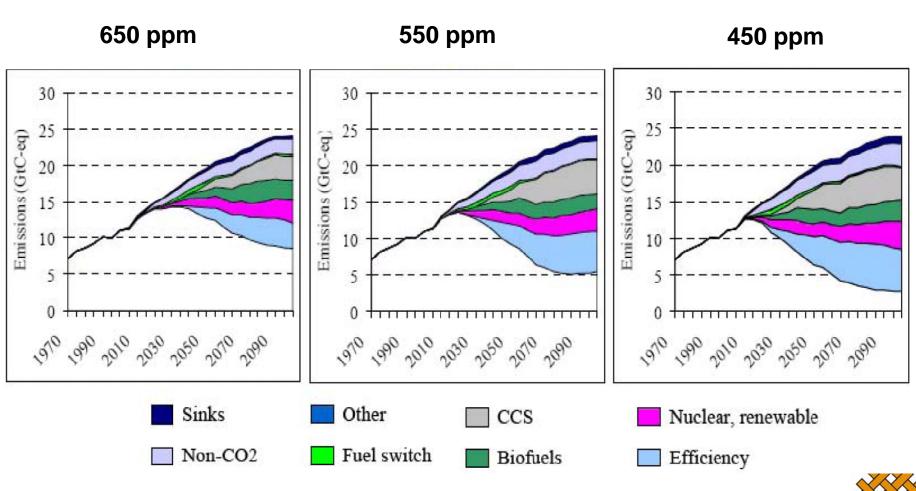


| Today's Technology | Actions that Provide 1 Gigaton/year of Mitigation |
|---------------------------|--|
| Coal Plants | Replace1,000 conventional 500- MW plants with "zero-emission" power plants |
| Geologic Sequestration | Install 3,500 Sleipners, at 1 Mt of CO ₂ per year |
| Nuclear | Build 500 1 GW plants |
| Efficiency | Deploy 1 billion cars at 40 mpg instead of 20 mpg |
| Wind | Install 750 x current |

Source: Pacala and Socolow, Science, 2004



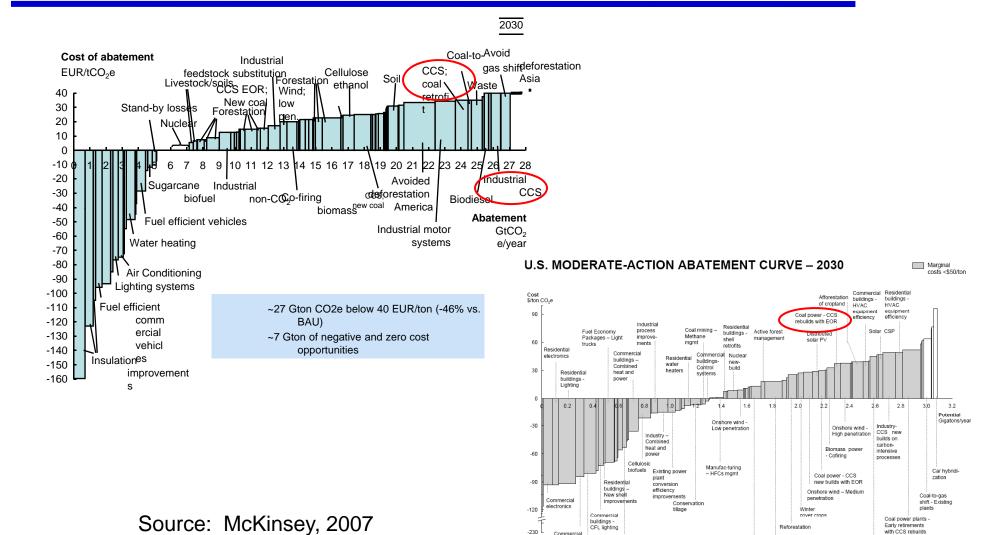
Filling the Wedges



Source: van Vuuren, den Elzen, Lucas, et al. 2006



EU and US Abatement Curves



Commercial buildings -LED lighting

> Fuel Economy Packages - Cars

buildings

Afforestation of

Coal powe

Natural das

management

A successful global CCS regime requires overcoming challenges:

- Cost
- Scale
- Public acceptability



Estimated Costs of Electricity (\$/MWh)

| | EPRI | MIT | S&P | Rubin <i>et</i> al |
|-----------------------------|------|-----|-----|--------------------|
| Pulverized Coal w/o Capture | 39.3 | 47 | 58 | 53 |
| Pulverized Coal w Capture | 62 | 77 | 120 | 73*-96** |
| IGCC w/o Capture | 45 | 51 | 67 | 55.5 |
| IGCC w Capture | 65.4 | 65 | 102 | 59*-79** |

^{*} Assuming EOR storage



^{**}Assuming saline aquifer storage

Estimated Costs of CO₂ Avoided (\$/ton CO₂)

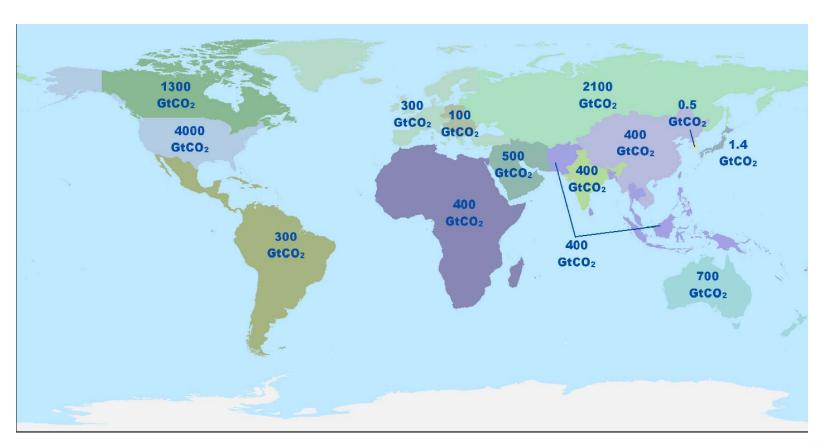
| | EPRI | MIT | S&P | Rubin et al |
|-----------------|------|-----|-------|-------------|
| Pulverized Coal | 39.3 | 47 | 80 | 29*-61** |
| IGCC | 45 | 51 | 41-46 | 5* - 32** |
| NGCC | 65.4 | 65 | 86 | 44*-72** |



^{*} Assuming EOR storage

^{**}Assuming saline aquifer storage

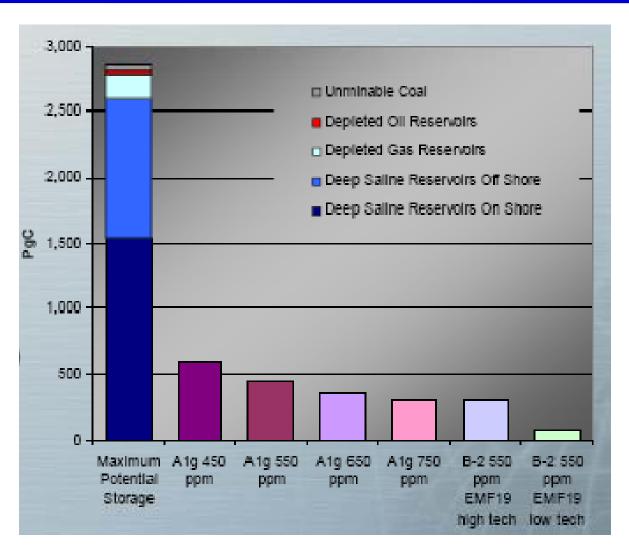
Suitable CCS sites are global...







...with large storage potential





Source: PNNL, GTSP

CO2-EOR Projects Sequestering U.S. Anthropogenic CO2

| | | CO ₂ Supply | | | |
|-----------------|-------------------|------------------------|--------|--|-----------------------------|
| State/ Province | Plant Type | MMcfd | MMt/Yr | EOR Fields | Operator |
| Texas | Gas Processing | 75 | 1.4 | Sharon Ridge, Sacroc, Others | ExxonMobil, KinderMorgan |
| Colorado | Gas Processing | 60 | 1.2 | Rangely | Chevron |
| Wyoming | Gas Processing | 180 | 3.5 | Patrick Draw, Lost Solider, Wertz, Others | Anadarko |
| Michigan | Gas Processing | 15 | 0.3 | Dover | Core Energy |
| 0klahoma | Fertilizer | 35 | 0.6 | Purdy, Sho-Vel-Tum | Anadarko, Chaparral |
| North Dakota | Coal Gasification | 145 | 2.8 | Weyburn (Canada) | EnCana, Apache |
| TOTAL | | 510 | 9.8 | | |

Source: Pew Climate Center, 2007



Public acceptability



WRI Guidelines

- Inform emerging regulatory and best practice development
- Transparent forum, diverse stakeholders
- Build consensus on key issues and develop a comprehensive set of CCS guidelines
- Provide context and rationale behind each recommendation
- Public acceptability

Web site: http://wiki.wri.org/ccs/



WRI CCS Guiding Principles

- 1. Protect human health and safety
- 2. Protect ecosystems
- 3. Protect underground sources of drinking water and other natural resources
- 4. Ensure market confidence in emissions reductions through proper GHG accounting
- 5. Facilitate cost-effective, timely deployment













Public Acceptance: Capture, Transport

- Capture: Existing power plant regulation likely adequate; may require additional oversight (and monitoring) for inclusion on trading regimes
- Transport: existing pipeline regulation
 - Issues: eminent domain, classification of CO2, ownership



Public Acceptance: Storage

Leakage

- Issues: Groundwater contamination; induced seismicity; catastrophic or slow release; property damage
- Manageable through careful siting, long term monitoring program
- Long term liability
 - During operations and closure phase and over longer term (>30-50 years)
 - Likely to require government assumption of liability (and therefore considerable confidence in robustness of reservoir)

Policy will be needed to meet these challenges



CCS Support Programs

United States

- DOE (Regional Partnerships, R&D, Futuregen, CSLF)
- EPACT (Tax Guarantees)
- State Incentives (e.g. NY, Illinois, Wyoming)
- Federal Legislation

Europe

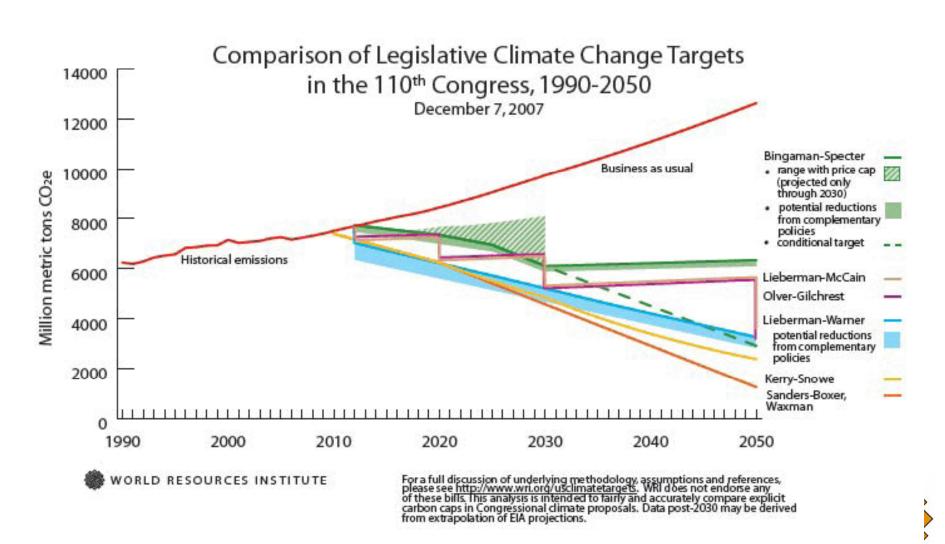
- EU Directive on CCS
- Consideration of inclusion of CCS in the EU- ETS
- Incentives by member states

<u>China</u>

- R&D platforms:
- CSLF
- UK China near Zero Emissions Coal Project
- Greengen Project
- Shenhua CTL plant



Congressional Action

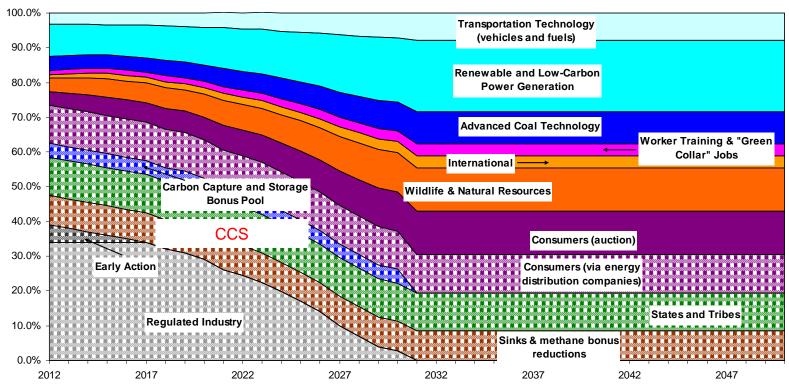




Lieberman Warner Bill: Allocations

(As reported out from Senate EPW Jan 23, 2008)

Note: Dashed color: direct allowances; Solid colors: Auction revenues



Note: revised bill has ~1.75 percent of allowances through 2030

Source: National Wildlife Federation



Conclusions Reprised

- Climate science is robust: it indicates a need for urgent and very large scale change
- A portfolio of actions will be necessary: we do not have the luxury of dismissing any promising mitigation options
- CCS will be part of the policy set: overcoming challenges of cost, gaining public acceptability, and scaling globally will be critical
- Policy will be needed to meet these challenges



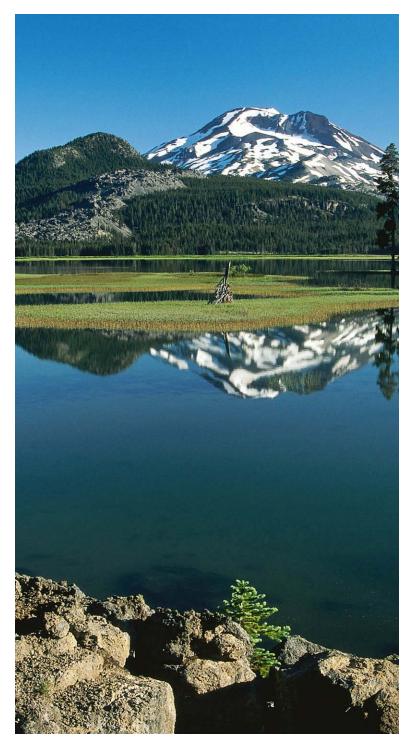




Jonathan Pershing (jpershing@wri.org)

World Resources Institute

http://www.wri.org





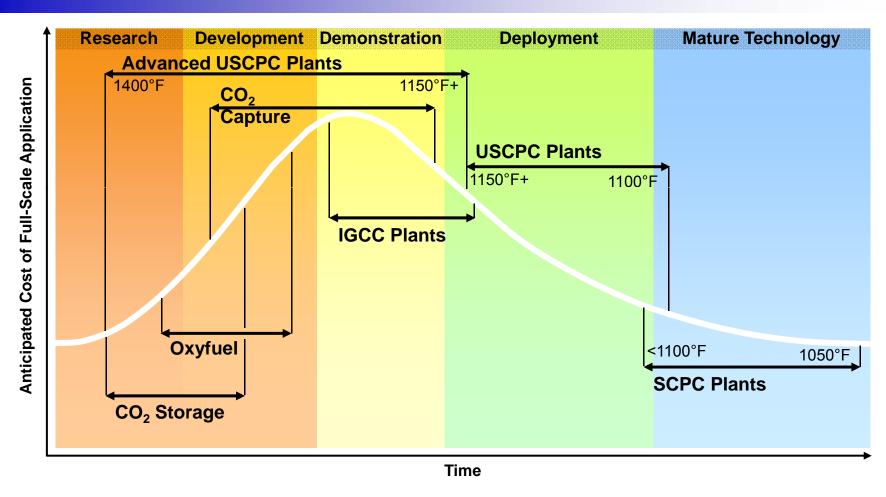
The Role, Status and Financing of CCS as a Mitigation Option in the United States

2nd Expert Meeting on Financing CCS Projects

May 28, 2008

Tom WilsonSenior Program Manager

The "Mountain of Death" for New Technology Who is Going to Pay for Early Deployment?



Policy Trend in U.S.: Increasing recognition that we need explicit strategies for funding research, development, demonstration and early deployment

Topics

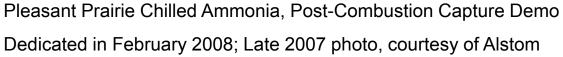
- CCS Cost
- Financing CCS
 - Lieberman-Warner
 - CO₂ Price
 - Incentives
- Demo Activities
- Concluding Thoughts





Part I: CCS Cost











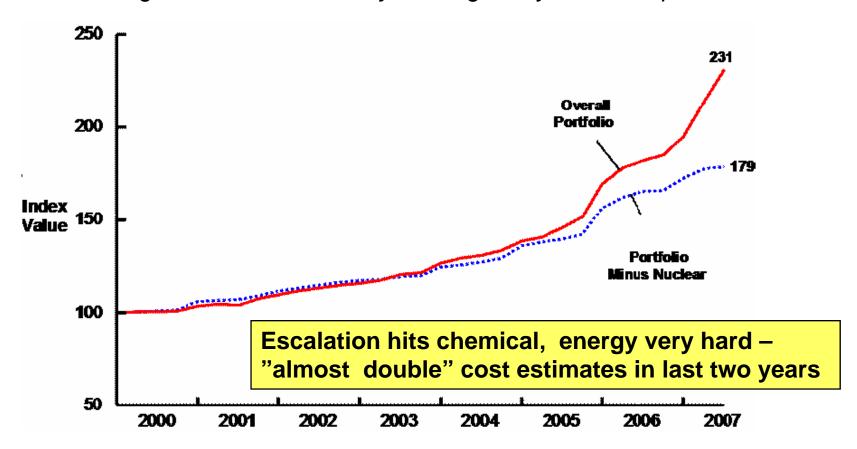


Capital Cost Estimates in Press Announcements and Submissions to PUCs in 2007–08—All costs are higher, more than would be predicted from indices (e.g., CEPCI)

| Owner | Name/Location | Net MW | Technology/ Coal | Estimate Date | Reported Capital \$ Million | Reported Capital \$/kW | Notes/Status |
|--------------------|--------------------------|---------|----------------------|------------------|-----------------------------------|---------------------------|----------------------|
| AEP/ Swepco | Hempstead, AK | 600 | SCPC/PRB | Dec. 2006 | 1680 | 2800 | CPCN issued |
| Southern Co. | Kemper County, MS | 560 | Air IGCC/ Lignite | Dec. 2006 | 1800 | 3000 | FEED in progress |
| Duke | Cliffside, NC | 800 | SCPC/ Bit | May 2007 | 2400 | 3000 | Permitted |
| Duke | Edwardsport, IN | 630 | IGCC/ Bit | May 2008 | 2350 In Service | 3730 | Permitted |
| AEP | Mountaineer, WV | 630 | IGCC/Bit | June 2007 | 2230 | 3545 | Permit in Review |
| Tampa Electric | Polk County, FL | 630 | IGCC/Bit | July 2007 | 1613 (all \$?) 2013 Serv | 2554/ 3185 | Shelved; now NGCC |
| Sunflower | Holcomb, KS | 2 x 700 | SCPC/PRB | Sept. 2007 | 3600 | 2572 | Permit denied |
| Am. Muni. Power | Meigs County, OH | 1000 | SCPC/Bit & PRB | Jan. 2008 | 2900/3300 | 2900/3300 | |
| Tenaska | Sweetwater County, TX | 600 | SCPC + CCS/PRB | Feb. 2008 | 3000 | 5000 | |

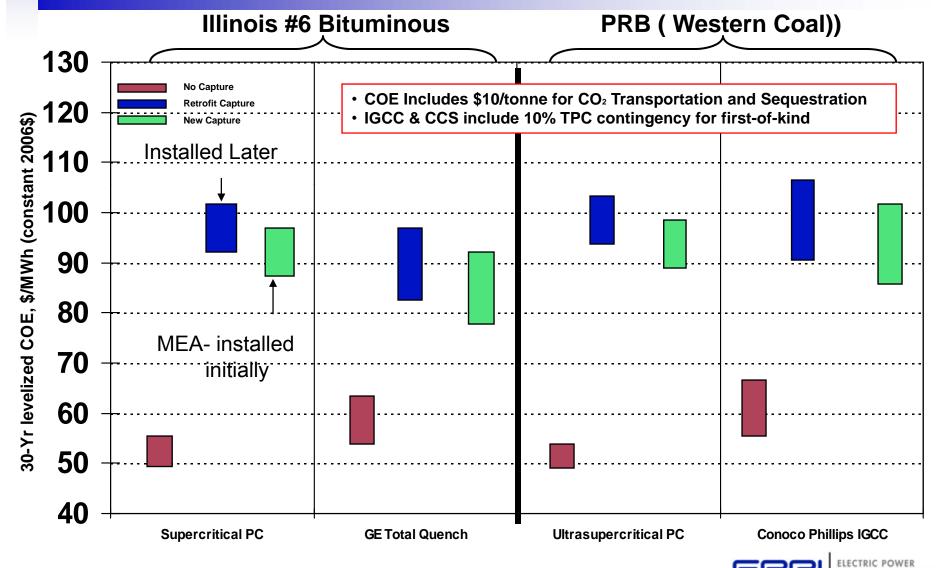
Energy Technology Costs Are Highly Uncertain: Are Today's Costs a New "Plateau" or a "Bubble"?

"North American Power Construction Costs Rise 27% in 12 Months" "Continuing Cost Pressures Likely to Bring Delays and Postponements"



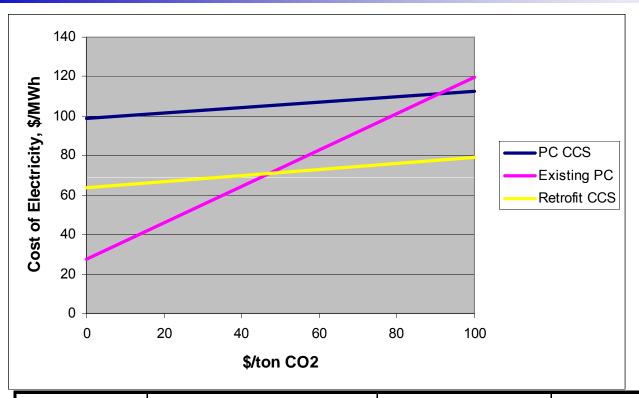
Source: IHS/CERA Press Release 2/14/08

With Current Technology CO₂ Capture Costly; No Clear Winners in Current Designs



CCS Retrofit May Be Attractive for Some Plants ... Cost of New PC w/ CCS versus Retrofit of Existing PC

(COE analysis, March 2008 Cost Estimates from G. Booras)

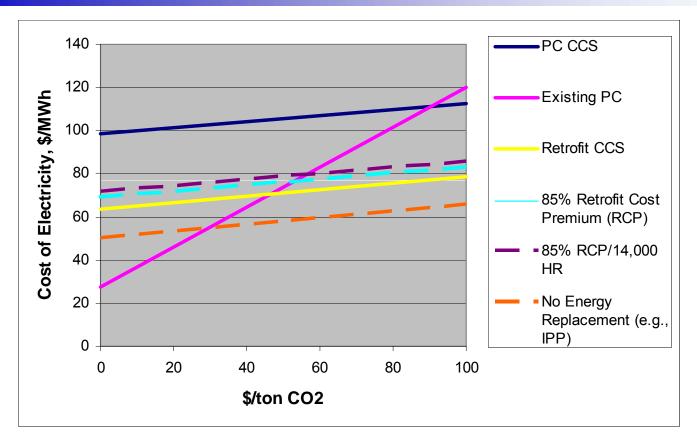


Analysis assumes:

- Retrofit MEA process in 2012
- 35% retrofit cost premium
- Replace capacity lost to retrofit w/ new PC w/ CCS

| Plant | New PC w/ CCS | Existing PC | Retrofit CCS |
|---------|---------------|--------------------|--------------|
| MW | 425 | 600 | 425 |
| \$/kW | 4000 | 0 | 940 * 1.35 |
| Btu/kWh | 11,300 | 9,500 | 12,500 |

CCS Cost Sensitivity Analyses (dashed lines)



- COE is relatively insensitive to significant capital cost and heat rate retrofit penalties
- Energy replacement cost is a significant fraction of retrofit cost. Some companies may not consider this cost (e.g., IPP).

Retrofit Issues for Post-Combustion Capture (e.g., for Existing Coal Plants)

Space

- Where is there 6 acres near an operating 500 MW plant?
- Have areas near stack been used for FGD, SCR retrofit?

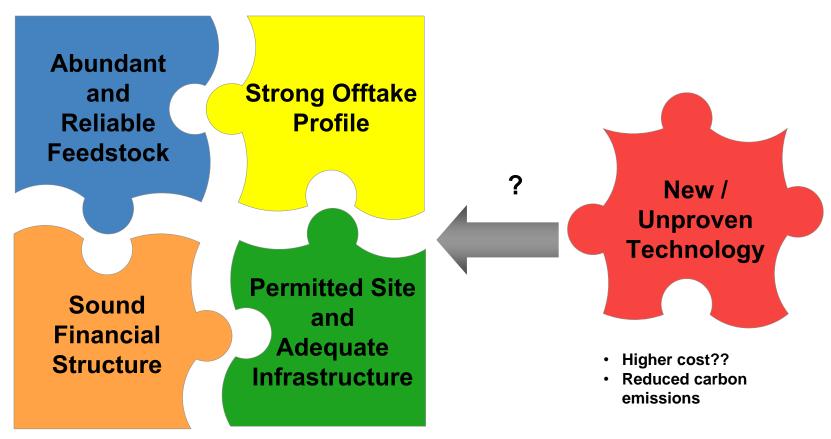
Steam

- Where do you get half the steam currently used in the low pressure turbine (e.g., for an amine regenerator)?
- Energy
 - How do you make up the lost power?
- Cost
 - SO₂ Scrubbers retrofits were 1.2-1.8x as expensive as on new units
- Transport and Storage
 - How do you transport the CO₂ offsite in populated areas



Part II: Financing CCS

Project Financing Elements



Source: Scully Capital



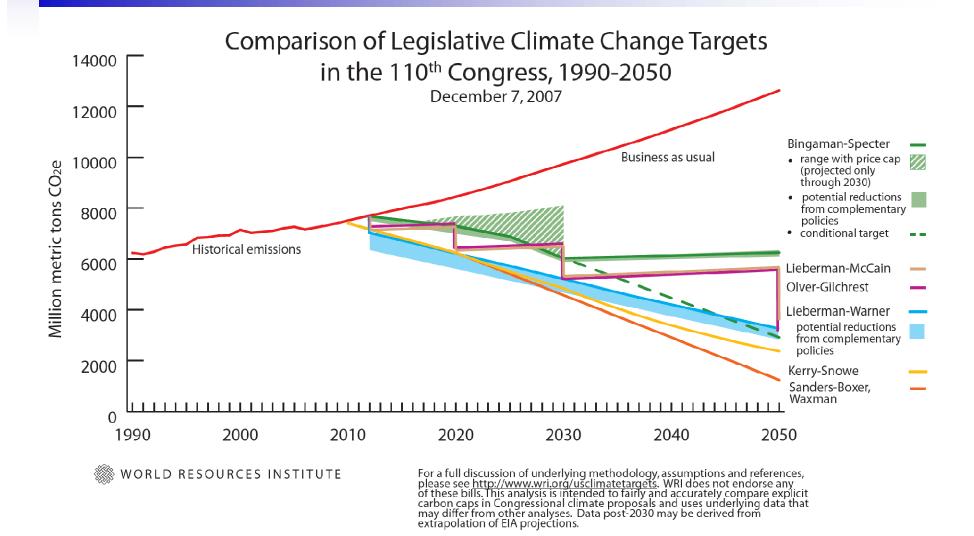
Sources of Funding/Economic Incentives

Funding Commercial-scale Projects will Likely Require a Combination of:

- Carbon price
- Carbon Tax/Allowance Proceeds
 - Lieberman-Warner R&D and Bonus Allowances
- Utility funding
- Federal funding
- State Incentives
 - E.g., Indiana expedited processing, extra 3% rate of return on equity, incentives for Indiana fuels for gasification, CWIP for environmental investments
- Venture investment
- Risk Sharing Funds



U.S. Climate Policy Proposals Focus on Cutting Emissions Significantly Below Historic Levels



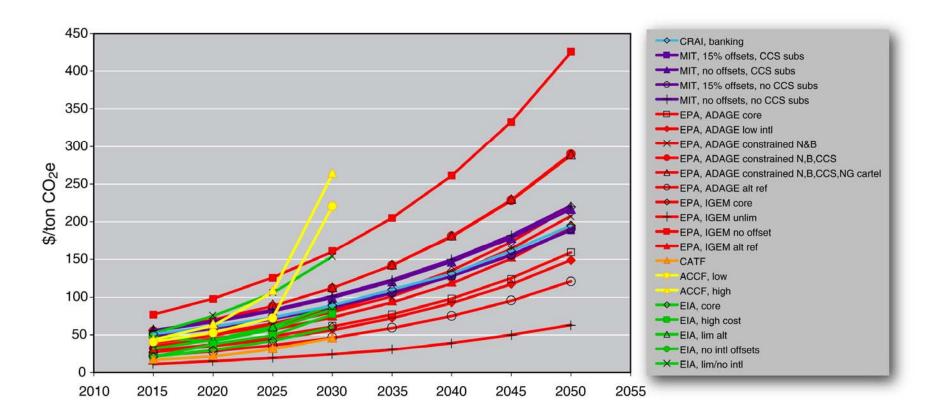


Elements of Lieberman-Warner Climate Security Act of 2007

- Economy-wide Coverage about 87% of 2005 emissions
 - Downstream on coal (units > 5,000 tons/yr)
 - Upstream on oil, gas, F-gases, N₂O
- Cap-and-trade system
 - 22.5% auction phasing to 69.5% by 2030
 - Permits/auction revenues designated for a wide array of uses
- Permits to support CCS development and deployment
 - CCS Technology Fund 1% of permits auctioned (120 days after enactment through 2022) to "kick-start" CCS
 - Goal: Rapid deployment of 5-10 commercial scale electric generation plants with CCS
 - Bonus Allowance Account 3-4% of permits 2015-2030, 1% of permits from 2031-2050.
 - Goal: Provide bonus permits to qualifying CCS plants maximum of 2 bonus permits annually, declining over time



And the Cost of Lieberman-Warner 2007 (L-W) is

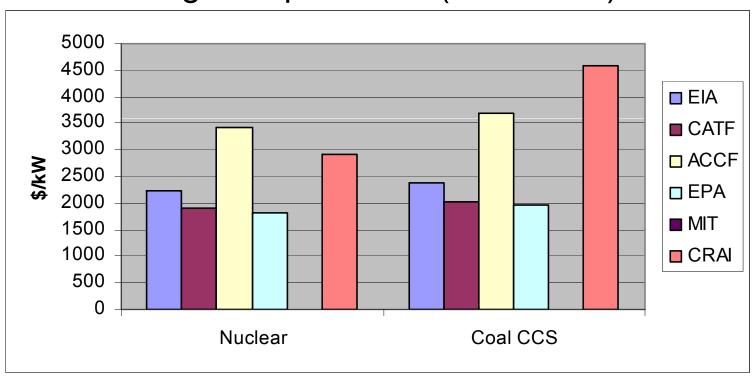


For more information on L-W Cost Estimates, see www.epri.com



Reported and Guesstimated Technology Cost Estimates for L-W Analyses

Overnight Capital Cost (2008\$/kW)



Caveats: Converted to 2008\$

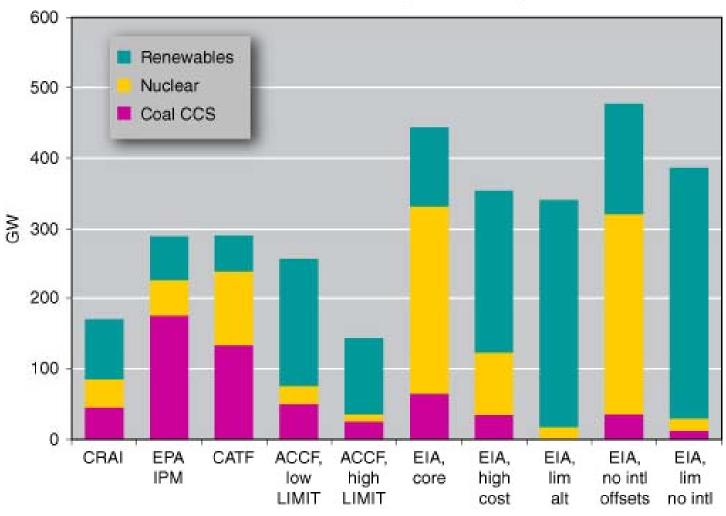
CATF= AEO2007, EPA/IPM= AEO2005, CRAI= updated AEO2007

Some costs decline rapidly over time, e.g., CRAI Coal CCS to \$3203/kW by 2050

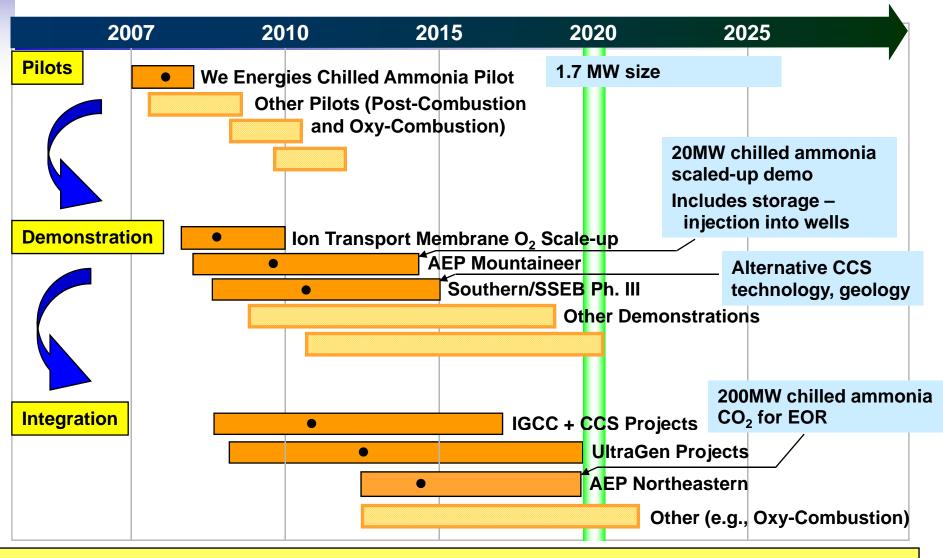


Cumulative Capacity Additions of Coal CCS, Nuclear and Renewables ... includes no CCS Retrofits

Cumulative Capacity Additions by 2030



Part III: Demo Activities



Goals - Affordable, Energy Efficient, Accepted



DOE Regional Carbon Sequestration Partnerships

Phase 1: Data collection

Phase 2: Small pilots

22 Geologic Injection Tests

8 EOR/Saline

6 Saline reservoirs

• 8 ECBM/EGR

EPRI involved in three saline

Phase 3: Demonstrations

Several possibilities for EPRI involvement

Representing: Cost Share 34% 216 Organizations 40 States 4 Canadian Provinces 3 Indian Nations · 34% cost share Big Sky 💢 West Coas Southwest Southeast

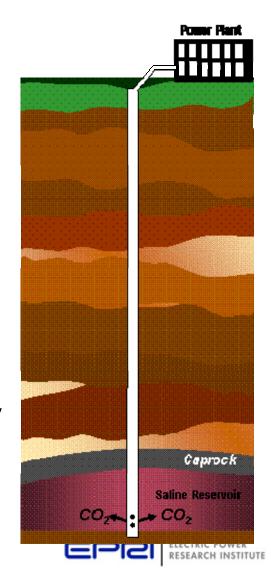
DOE Phase 3 Update

WESTCARB

- Original focus on BP Carson project, changed to Clean Energy Systems (CES)
- 500k t/y for 4 years starting in 2010

SECARB

- Two part injection into same saline reservoir in two geologically separate locations
- Cranfield: Purchased CO₂ @ 1Mt/y for 1.5 y
- Another test: Inject 100-250 kt/y from a CO₂ capture pilot located at a Southern Company site



Concluding Thoughts

- CCS is a critically important technology to the U.S.
 - Large coal reserves
 - Large potential sequestration potential
- In the U.S., cost of coal with CCS (and other generation technologies) has ~doubled since 2000
 - CCS retrofit is being considered
- Lieberman-Warner could produce CO₂ price and incentives sufficient to spur CCS deployment, but need investment now for technology to be commercial by 2020



Questions?



See EPRI Journal Summer 2007 and Recent Congressional Testimony

Contacts

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General <u>-askepri@epri.com</u>





The Integrated CO₂ Network: A Path Forward for Carbon Capture & Storage

May 28, 2008



































Agenda

- **→** Introduction of ICO₂N
- > Canadian Dynamic
- > Policy Development
- > Partnership as the path towards deployment



ICO₂N Overview



ICO₂N

- > 18 leading companies from a variety of industries
- **Represents:**
 - >100 Mt/yr of CO₂ emissions, 15% of Canada's emissions
 - >60% of Alberta's power generation
 - ~95% of oil sands production







































ICO₂N's Mandate

OBJECTIVE: Work proactively with governments and stakeholders to establish policy and risk-sharing for CCS that will encourage uptake in the near term and

set the stage for a functioning long-term Integrated

CO₂ Network (ICO₂N) that can handle large volumes

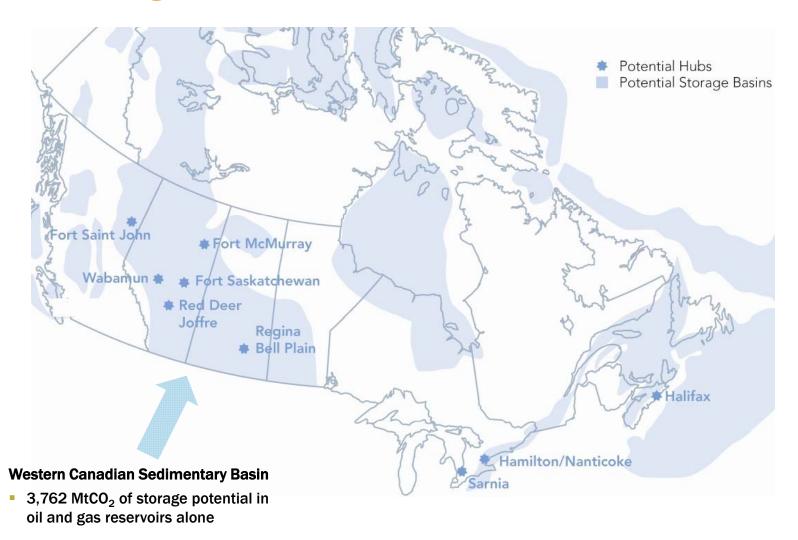
at minimal overall cost



The Canadian Dynamic



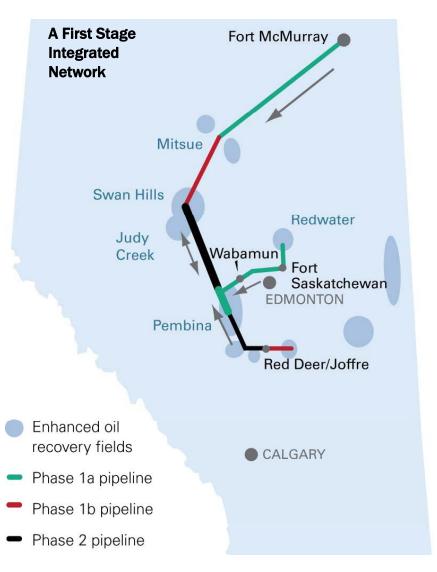
Long-term Vision of CCS Across Canada





ICO₂N's Long-term Vision

A large-scale,
long-term vision
is essential to
realize the full
potential of CCS

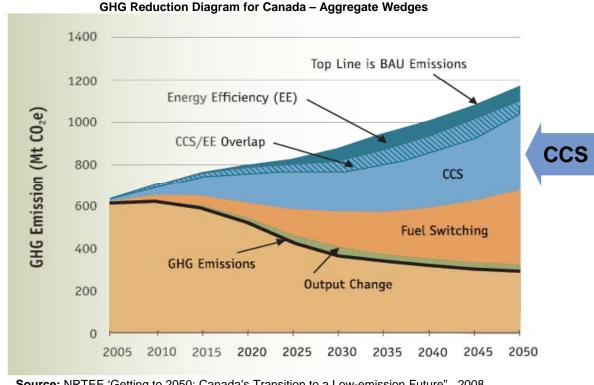




CCS is Important

A Strategic Investment for Canada

- 1. A critical component of **Canada's GHG reduction** strategy
- 2. A critical component of Canada's energy strategy
 - **Balancing economics** with GHG reduction
 - Coal & Oil
- 3. A 'Made in Canada' solution

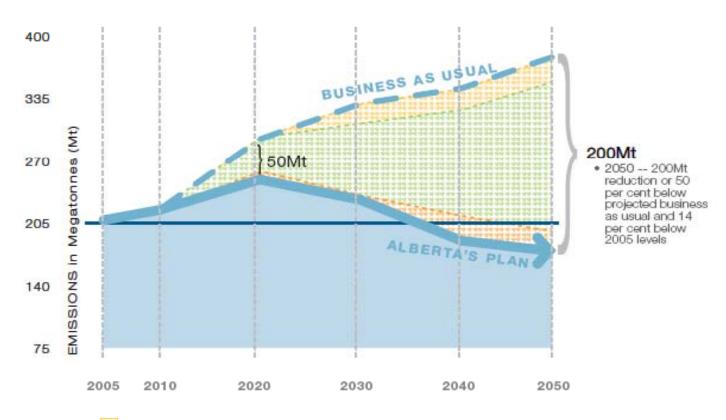


Source: NRTEE 'Getting to 2050: Canada's Transition to a Low-emission Future", 2008



The Alberta government emphasis on CCS....

ALBERTA'S REDUCTION COMMITMENTS





GREENING ENERGY PRODUCTION 37Mt

TOTAL = 200Mt

2008 Alberta Climate Change Strategy



Politics



Canada is a Confederation

Canada is a federal state, however it is among the world's most decentralized federations

Jurisdictional issues are making timely adoption of a climate change policy challenging



National Climate Policy

National plan for 20% below 2006 emissions by 2020

- 330Mt from BAU projections
- 165Mt from industry with a focus on coal and oilsands

Industry targets:

- 1. Existing facilities (pre-2004)
 - 18% intensity reduction in 2010, decreasing by 2%/yr thereafter
- 2. Facilities operational between 2004 & 2011
 - Clean fuel (nat. gas) standard
 - 3 years to set emissions baseline, then 2%/yr intensity reduction
- 3. Facilities operational 2012 onwards
 - Clean fuel standard or CCS 'capture ready'. CCS equivalent by 2018



Canadian Provinces

Many Climate Change plans

- > Quebec
 - Focus on hydroelectric
- Ontario Phase out coal
 - Focus on Nuclear and natural gas
- > British Columbia 33% reduction by 2020 Net zero electricity by 2018.
 - Carbon tax
- > Alberta operational cap and trade system (mid-2007)
 - Intensity targets, but less than federal

Alignment with the US

- Western Climate Initiative:
 - Quebec, Manitoba, British Columbia are members
 - Ontario and Saskatchewan as observers
- RGGI Quebec and Eastern Provinces are observers



Policy to incent CCS Development

Canada/Alberta Task Force

- Reported to governments in January
- ➢ Goal of 5Mt by 2015
- ▶ \$2B needed to cover the gap on the first 3-5 projects (allocated through an RFP)

Federal

- ➤ \$125M RFP for large-scale CCS projects. Matching funds from industry and max government contribution of \$30M
- > \$250M for SaskPower retrofit of a 100Mw coal-fired power plant
- > Pre-certification credits to help cover the gap

Alberta

- Industry led 'Development Council' reporting back fall 2008
- Location of majority of future CCS activity



Current CCS Operations in Canada

Weyburn / Midale

• 2 Mt/yr CO₂ from gasifier in N. Dakota via 320km pipeline to EOR in SE Saskatchewan

SaskPower - Boundary Dam

- Retrofit 100 MW coal fired power plant with delivery to Weyburn area
- \$250M Federal and \$750M provincial funding announced

Glencoe

Commercial project of 0.18Mt/yr - combining EOR & low cost CO₂

Proposed full scale projects

- TransAlta and EPCOR each moving ahead with CCS FEED studies
- Northwest Upgrading gasifier to incorporate CCS (awaiting financing)
- Sherritt coal gasifier on hold 'because of uncertainty'



Overcoming CCS Inertia



Overcoming CCS inertia

1. Investment Risk

- Large capital expenditures up front
- Uncertain policy future
- Early adoption may not pay

2. Technology Risk

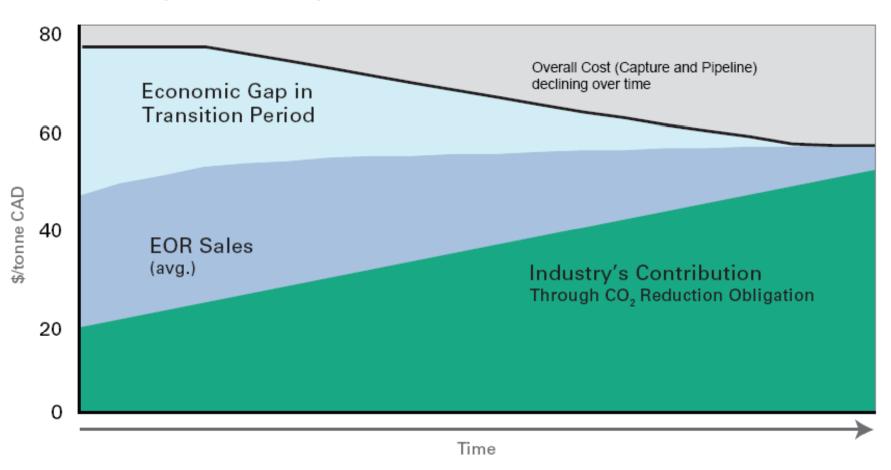
3. Economics

- Economic gap in foreseeable future
- Questionable EOR revenue sources



A Case for Partnership

Conceptual Portrayal of CCS Economics

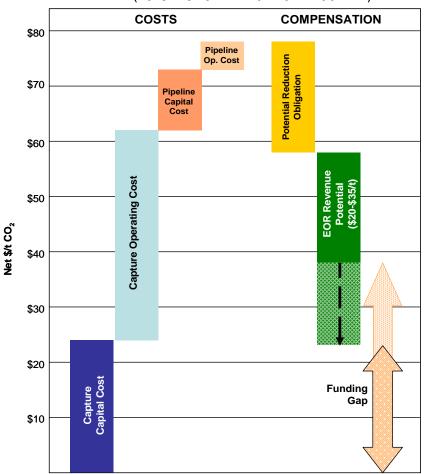




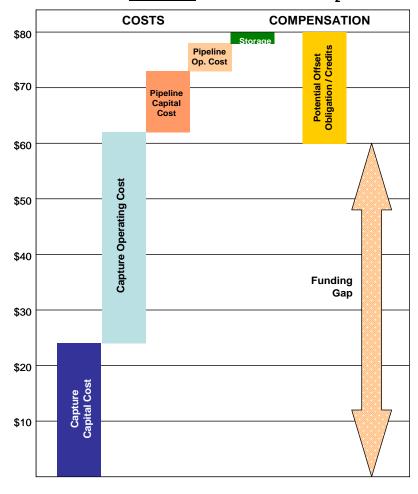
Conceptual CCS Economics

Hypothetical Economic Profile

WITH A MARKET FOR CO₂ (VOLUMES TO ENHANCED OIL RECOVERY)

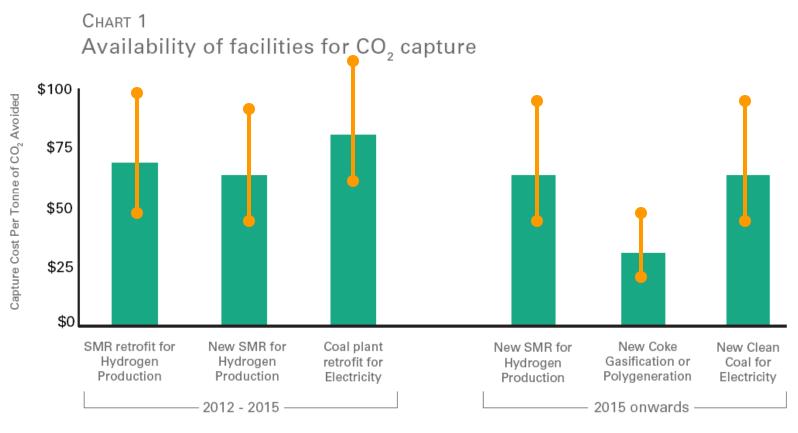


Hypothetical Economic Profile WITHOUT A MARKET FOR CO₂





Capture Costs for Canada



Timeframe for Facilty Availability

Notes: - Error bands are +50% -30%, better cost estimates will be site specific.

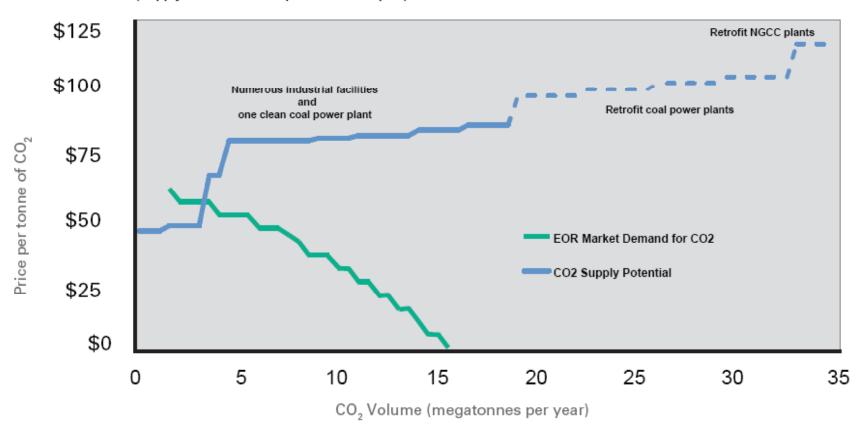
- Includes compression, excludes pipeline or injection/storage/monitoring costs



Balancing Supply and Demand

CHART 6
CO₂ Supply & EOR Demand Potential 2012 - 2015

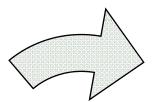
(Supply cost includes capture and transport)



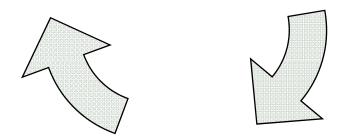


ICO₂N's Key Principles to Make CCS a Reality

GOAL: The staged development of a long-term, large-scale CCS solution that strategically addresses environmental, energy and economic growth.



APPROACH: A strong publicprivate partnership to drive initial deployment of an integrated approach to CCS



IMPLEMENTATION: Range of tools and policy innovation to encourage major investments in CCS

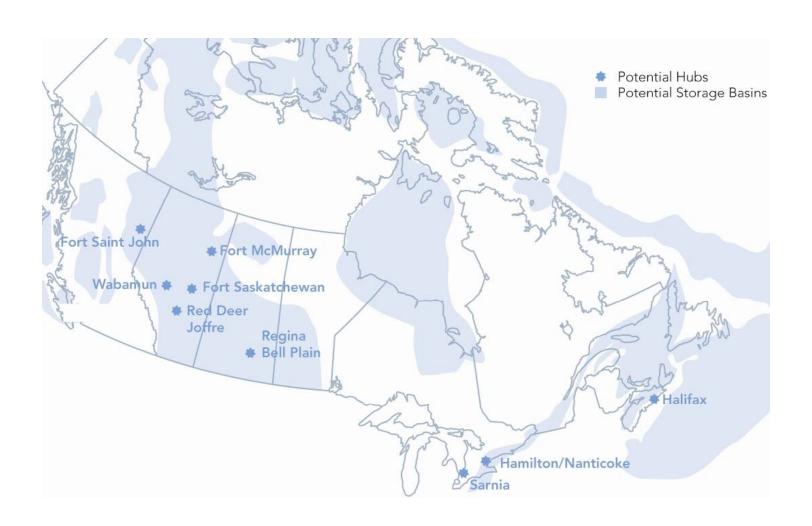


Moving Towards Deployment

- Government direction on CCS has been established
- > ICO₂N: Significant value in an integrated system.
- As much an oil sands issue as it is coal.
- > Joint ventures a likely structure for initial deployment
 - Spreads first-mover risk
 - Addresses issues of lumpy expenditures and timing
 - History of collaboration in the oil sector
- Partnerships as the way forward
 - Policy tools are being explored



Canada: A potential leader in CCS deployment...



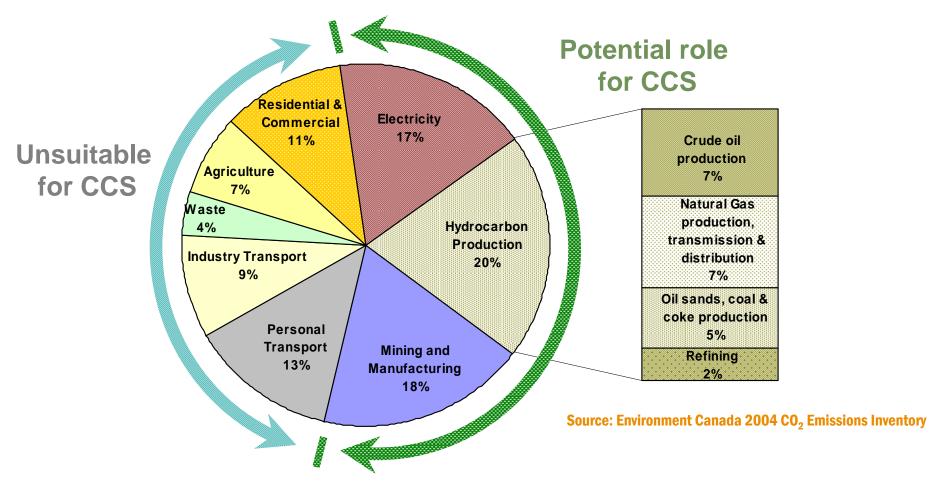


SUPPLEMENTARY INFORMATION



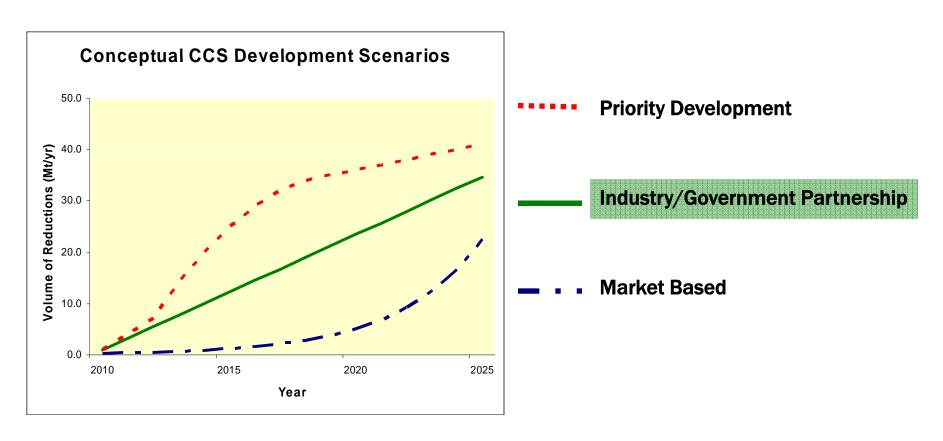
GHG Emission Sources in Canada

Only certain industries can pursue CCS





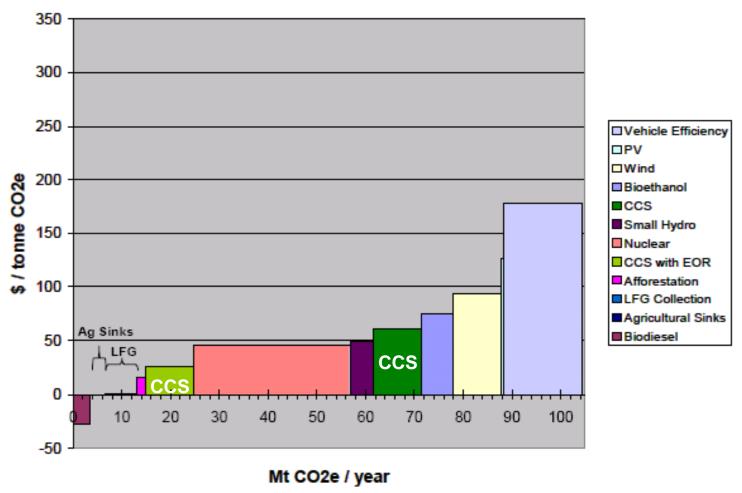
Vision of CCS Deployment: Industry / Government Partnership



Choice of path affects ability to meet national emissions reductions and could protect energy sector growth.



CCS is cost and volume competitive





Delphi Report 2008

CCS - Nascent Market Development

| | Mature Markets | Nascent Markets |
|------------------------------|----------------------------|---|
| Price disclosure | Open | Limited |
| Number of buyers and sellers | Many | Few of both |
| Transaction Costs | Usually low | Usually high |
| Supply/Demand Balance | Close | Can be widely divergent |
| Monopoly supply or demand | Infrequent | Typically an actual or effective monopoly |
| Market Growth rate | Low | High, and volatile |
| Technology | Mature, low rate of change | New, competing alternatives |

CCS has characteristics of an immature market. Government involvement can advance adoption.

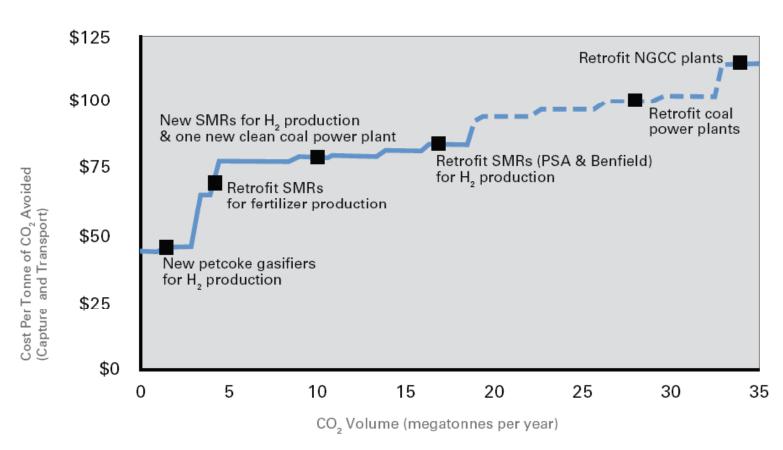


Technology & Economics



Capture Volumes

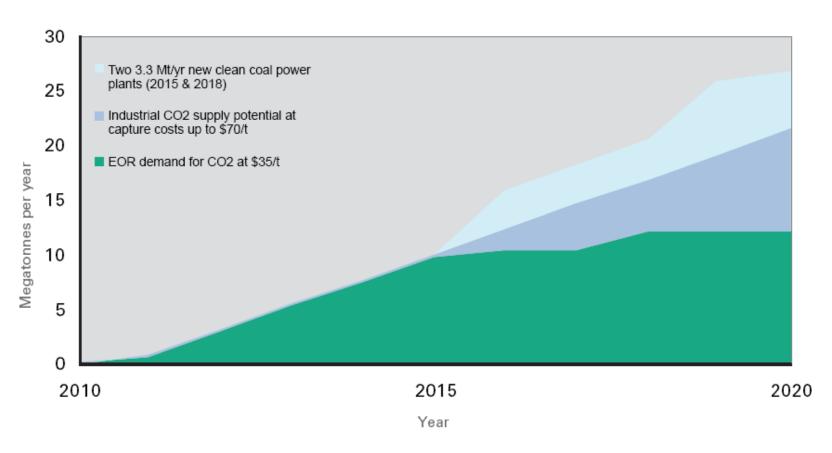
CHART 2
CO₂ Supply Potential 2012 to 2015 cost includes capture and transport





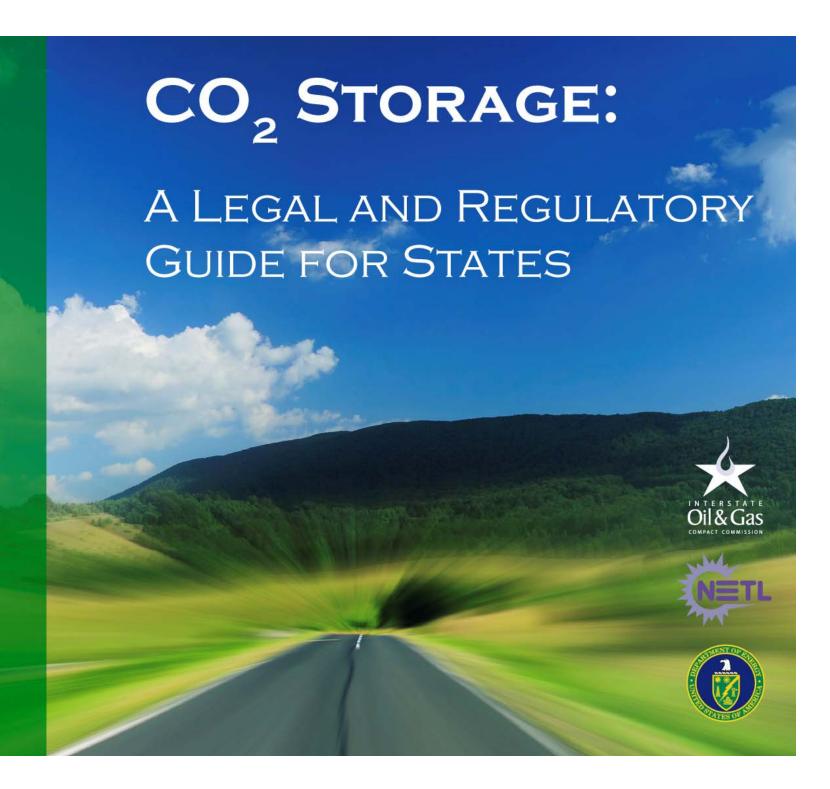
Issue of Oversupply

Chart 4
Conceptual Phasing of CCS

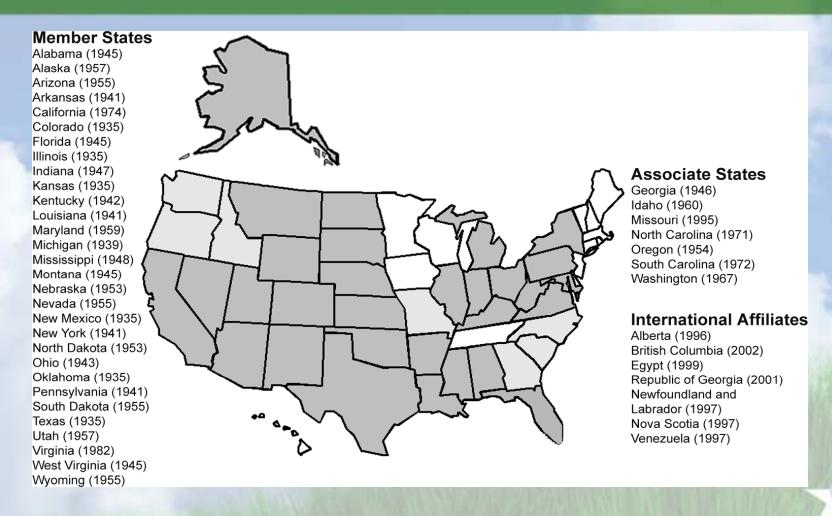




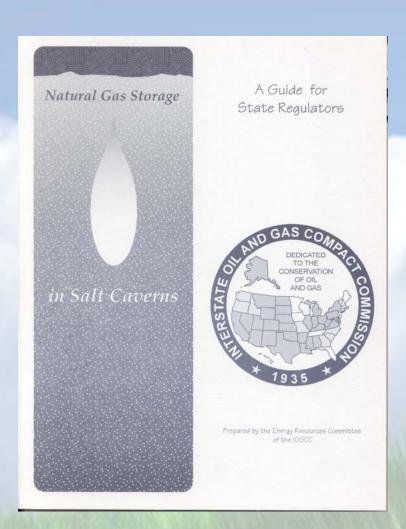
ROAD TO A GREENER ENERGY FUTURE



INTERSTATE OIL & GAS COMPACT COMMISSION

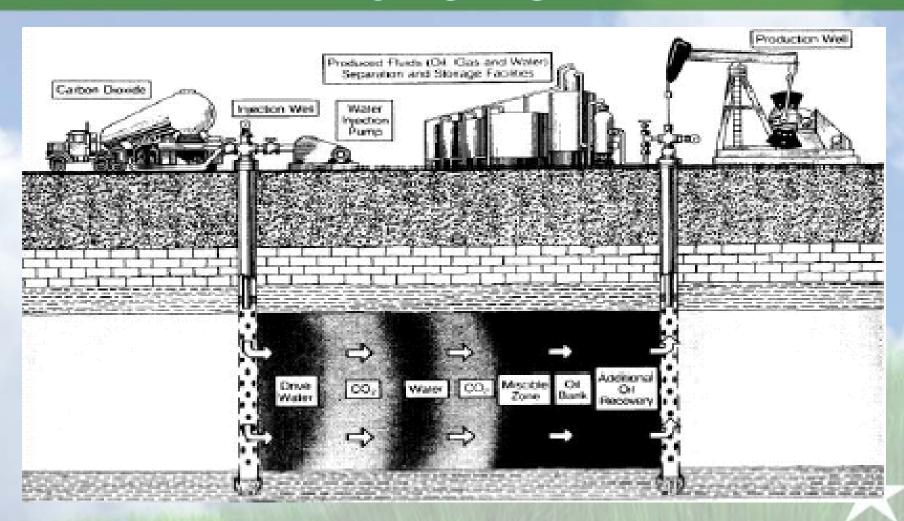


Model Regulatory Guidance



- One of many IOGCC regulatory guidance documents for states and provinces
- Helps ensure regulatory consistency among states and provinces.

CO₂ ENHANCED OIL RECOVERY INJECTION

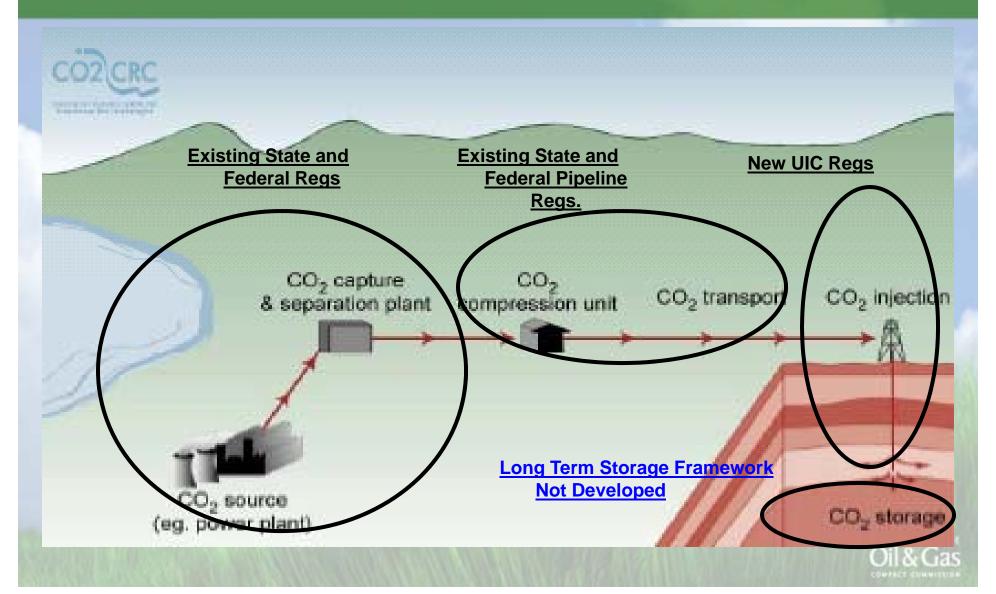




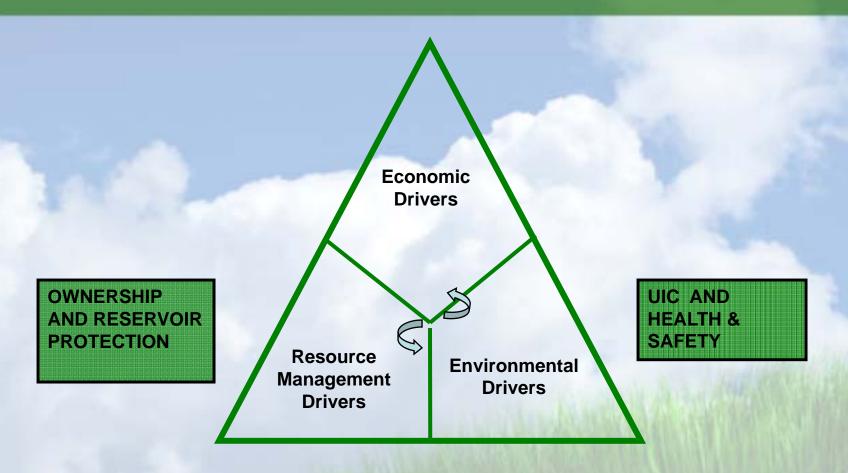
Industry knows how to handle CO₂



CO2 CAPTURE TRANSPORTATION AND GEOLOGIC STORAGE PROCESS



EMMISSIONS TRADING REGULATIONS



CCS REGULATORY FRAMEWORKS



Differences Between Policy, Legal, Regulatory and Liability Aspects

- Policy: What governments (should) do to encourage or discourage a particular activity
- <u>Legal</u>: The right to engage in a particular lawful activity on one's property
- Regulatory: Permission to engage in that particular activity if certain conditions are being met
- <u>Liability</u>: Who is responsible for what in case of failure

Carbon Dioxide: Commodity, Pollutant, or Hazardous Waste?

Commodity

Commercial value for use in EOR / EGR, already active

Pollutant

- Recent U.S. Supreme Court ruling that EPA must make this determination
- Crude oil, coal, and natural gas, if mismanaged

Hazardous Waste

- Makes handling, injecting, and sequestering far more expensive
- Coupled with sequestration, encumbers EOR / EGR commercial opportunities in the U.S.



Task Force Representatives

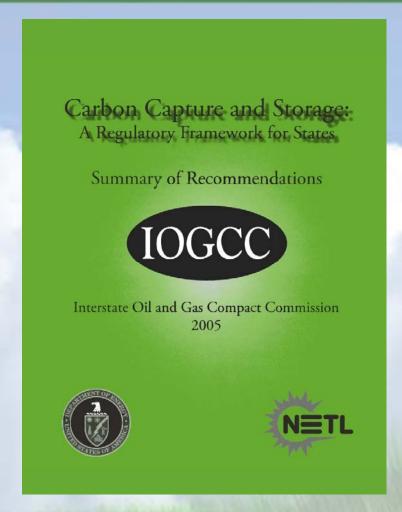
- Representing 15 States
- IOGCC member state and provincial oil and gas agencies
- DOE sponsored Regional Carbon Sequestration Partnerships
- Association of State Geologists
- US DOE
- Independent experts
- US EPA
- US BLM
- Environmental organizational observer



IOGCC Resource Management Philosophy For CCS

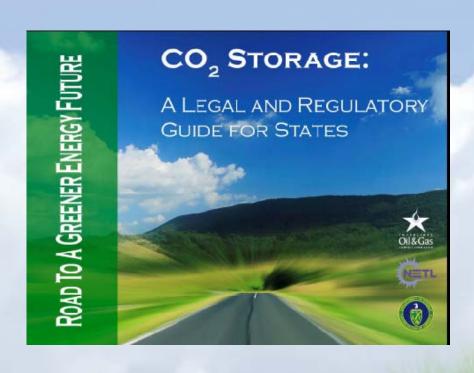
- Given the regulatory complexities of CO₂ storage including environmental protection, ownership and management of the pore space, maximization of storage capacity and long term liability, the Task Force strongly believes that geologically stored CO₂ should be treated under resource management frameworks as opposed to waste disposal frameworks.
- Regulating the storage of CO₂ under a waste management framework <u>sidesteps the public role</u> in both the creation of CO₂ and the mitigation of its release into the atmosphere and <u>places the burden solely on industry</u> to rid itself of "waste" from which an "innocent" public must be "protected".
- Such an approach <u>lacking citizen buy-in</u> with respect to responsibility for the problem as well as the solution <u>could well</u> <u>doom geological storage to failure</u> and diminish significantly the potential of geologic carbon storage to meaningfully mitigate the impact of CO₂ emissions on the global climate.

Brief Summary of Phase I Work and Recommendations



- Industry and states have 30 years experience in the production, transport and injection of CO.
- States have necessary regulatory analogues in place to facilitate development of a comprehensive CCGS regulatory framework.
- CO₂ should be regulated as a commodity to allow the application of oil and gas conservation laws which will facilitate development of storage projects.
- Involve all stakeholders including general public in the development of regulatory frameworks.

New IOGCC Phase II Report



 Released in January 2008

 Summary of the report and a copy of the full report on CD-ROM.



What the Guidance Document provides to states & provinces

Storage of Carbon Dioxide in Geologic Structures A Legal and Regulatory Guide for States and Provinces

Topical Report

Reporting Period Start Date: April 14, 2006 Reporting Period End Date: August 20, 2007

Prepared by the IOGCC Task Force on Carbon Capture and Geologic Storage. Principal authors: Lawrence E. Bengal, Berry H. Tew, Jr., Michael D. Stettner and Kevin J. Bliss

Report Issued: September 20, 2007

DOE Award No. DE-FC26-05NT42591

Interstate Oil and Gas Compact Commission P.O. Box 53127 Oklahoma City, OK 73105

- Background on why states and provinces are the most logical "cradle to grave" regulators.
- Useful background on climate change and the importance of geologic storage.



Model Statutes and Regulations

Model Statute 1

GEOLOGIC STORAGE OF CARBON DIOXIDE

Section 1. Legislatiive declaration; jurisdiction.

(a) The Legislature of the State of declares that (1) the geologic storage of carbon dioxide will benefit the citizens of the state and the state's environment by reducing greenhouse gas emissions; (2) carbon dioxide is a valuable commodity to the citizens of the state; and (3) geologic storage of carbon dioxide gas may allow for the orderly withdrawal as appropriate or necessary, thereby allowing carbon dioxide to be available for commercial, industrial, or other uses, including the use of carbon dioxide for enhanced recovery of oil and gas (EOR).

(b) The State Regulatory Agency shall have the jurisdiction and authority over all persons and property necessary to administer and enforce effectively the provisions of this article concerning the geologic storage of carbon dioxide. In exercising such jurisdiction and authority granted to it, the State Regulatory Agency may conduct hearings and promulgate and enforce rules, regulations, and orders concerning geologic storage of carbon dioxide.

- (a) Carbon diaxide. Anthrop ogenically sourced carbon diaxide of sufficient purity and quality as to not compromise the safety and efficiency of the reservoir to effectively contain the carbon dioxide
- (b) Oil or gas. Oil, natural gas, or gas condensate.
- (c) Reservoir. Any subsurface sedimentary stratum, formation, aquifer, or cavity or void (whether natural or artificially created) including oil and gas reservoirs, saline

General Rules and Regulations

GEOLOGIC STORAGE OF CARBON DIOXIDE

Section 1.0. Applicability

The following rules and regulations shall govern the geologic storage of CO_2 in geologic reservoirs. These rules apply to all CO2 storage operations occurring within the territorial

The following terms, as used in these regulations for geologic CO₂ storage facilities, shall have the following meanings:

- (a) CO₂ means anthropogenically sourced carbon dioxide of sufficient purity and quality as to not compromise the safety and efficiency of the reservoir to effectively contain the
- (b) CO2 Facility (CF) means, all surface and subsurface infrastructure including wellhead equipment, down hole well equipment, compression facilities and CO2 flow lines from injection facilities to wells within the Geological Storage Unit (GSU), monitoring instrumentation, injection equipment, and offices. CF does not include the main transportation pipeline to the GSU and pump stations along that pipeline. (c) CO2 flow lines means the pipeline transporting the CO2 from the CF injection facilities to the wellhead.
- (d) CO2 injection well means a well used to inject CO2 into and/or withdraw CO2 from a
- (e) CO2 Storage Project (CSP) means the project in its entirety, including CF and GSU. (f) CSP Closure Period means that period of time (10 years unless otherwise designated by the State Regulatory Agency {SRA}) from the permanent constitution of active CSP injection operations until the expiration of the CSP performance bond, unless monitoring efforts following the operational period demonstrate to SRA that a different time frame is
- (g) CSP Operational Period means the period of time in which injection occurs.
 (h) CSP Operator means that entity required by SRA to hold the permit.
- (i) CSP Permit means the permit issued by the state or province to operate a CSP.
- (i) GSP Post Closure Period means that period of time after the release of the GSP performance bond



Canadian provinces should replace "state" with "province" as appropriate.

² The purpose of this section is to make clear that the primary goal is to permanently store-earbon dissoids to mitigate its impact on global climate change; however, given the commodity status of carbon dioxide, under certain circumstances states need statutory authority to regulate withdrawal of previously stored

¹ This document is drafted using the word "state". Caractian provinces should substitute either the word "province" or "provincial" as required. Similarly, Canadian provinces should substitute as appropriate the definitions of Underground Sources of Drinking Water (USDW) and Safe Drinking Water Act (SDWA)

Overview and Storage Rights

Part 2: Overview and Explanation of the Model General Rules and Regulations

Regulations Overview

The Interestate Oil and Gas Compact Commission's Task Force on Carbon Capture and Geologic Storage has prepared this guidance document. Much of the work has been accomplished by the Task Force is Model Regulations Working Group. The Task Force began its work June 28-30, 2006, in Dallas, Taxas, at which time the tasks and responsibilities of the Model Regulations Working Group were defined. The group hold three meetings: a kick-off meeting on September 5-8, 2006, in St. Louis, Missouri; a mid-point meeting on October 18, 2006, in Anstitu, Taxas; and a joint wrap-up meeting with the outine Task Force on May 5, 2007, in Point Class, Alabama.

The guidance document is being prepared for IOGCC member states, including its affiliate member provinces. Although references throughout this document are, for the most part, to "state" or "states", it is the intent of the Task Force that the comments and provisions are equally applicable to Canadian provinces. Specific notation of this is made in both the Modal Rules and Regulations and Model Status statched. Additionally, in Canada, protection of both groundwater resources and cleep injection fall entirely within provincial jurisdiction, and there is no federal equivalent of the U.S. Safe Drinking Water Act and the UIC program. Accordingly, regulations may vary from province to province, but their essence is the same and comparable with the U.S. regulations.

This overview section is followed by an appendix consisting of three parts. Appendix I provides a draft model statute for the Geologic Storage of Carbon Dioxide. It contains legislative language measure to enable a Stere Regulatory Agency to implement the draft model rules and regulations. Appendix II contains the draft model rules and regulations for geologic CO₃ storage. Taken together, Appendix II contains the principal deliverable work products of the Task Force. Appendix III contains background material on the "Analysis of the Ownership of Storage Rights Relating to the Storage Octob Geologic Structures".

The following provides an overview, explanation, and rational for the various sections in Appendix II (Model Rules and Regulations).

Section 1.0. Applicability

Part 1: Analysis of Property Rights Issues Related to Underground Space Used for Geologic Storage of Carbon Dioxide

Prepared by

David Cooney

IOGCC Task Force on Carbon Capture and Geologic Storage Subgroup of State Oil and Gas Attorneys Marvin Rogers, David Cooney, Cammy Taylor

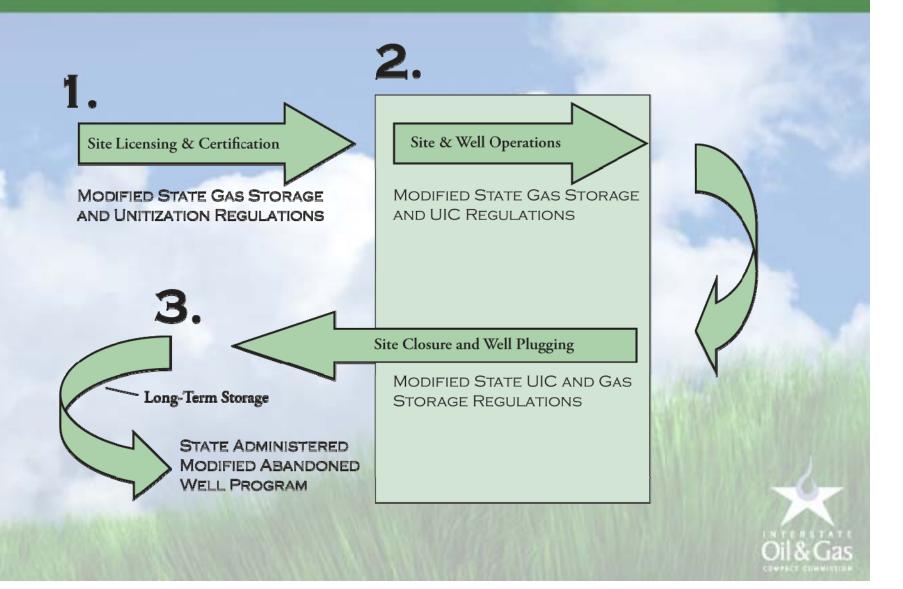
Several legally recognized interests might exist in property where underground pore space in a particular interval or intervals is to be used for geological storage (GS). Surface owners, mineral owners, lessees of solid minerals, oil and gas lessees, and owners of non-operating interests in production all might have legal rights that could be affected by GS. Because the law recognizes an ownership interest in subsurface pore space, a regulatory program that manages storage (as opposed to water protection) should include clear rules about how these rights will be recognized and protected, as well as a process for assuring that the storer secures the legal property right to store CO₁.

The Interstate Oil and Gas Compact Commission (IOGCC) Geological CO₂ Sequestration Task Force identified three working models that can provide technological and regulatory guidance for GS: (1) injection of CO₂ into underground formations for enhanced oil

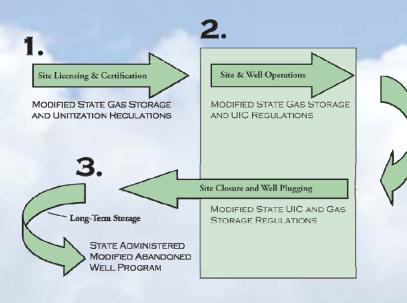


See Williams and Moyers, Oil and Ose Law Vol. 1, \$222 (Matthew Bender, 2006), for identification of property interests related to storage of natural gas in geologic reservoirs.

CGS Regulatory Framework



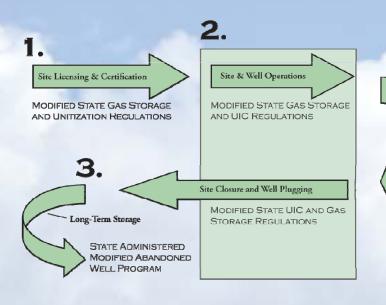
Phase I: Site Licensing including amalgamation of storage rights



- Licensing of entire reservoir (purchase &/or eminent domain)
- Submission of detailed engineering and geological data along with a CO₂ injection plan
- Operational bond
- Primarily State jurisdiction

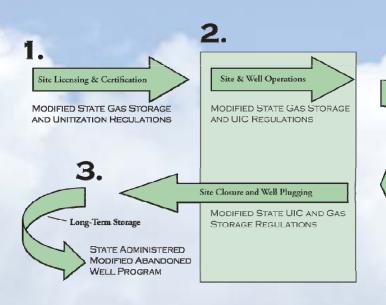


Phase II: The Storage and Closure Phase



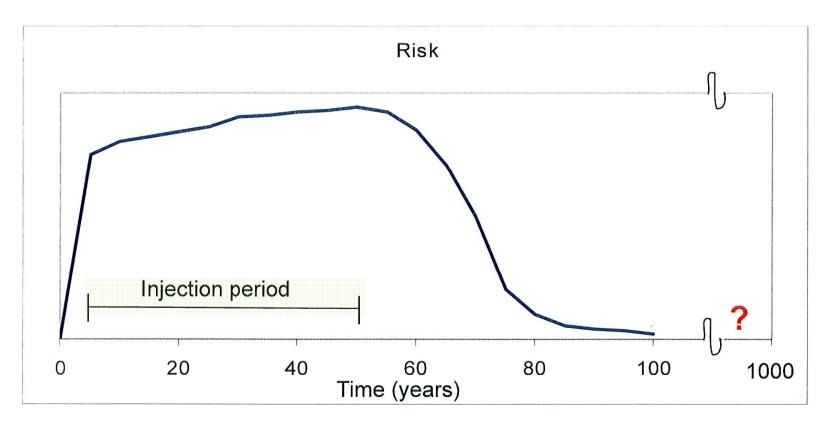
- The phase where the project is developed, operated and closed
- Regulation to safeguard life, health, property and the environment
- EPA regulatory overlap in this phase under Safe Drinking Water Act (UIC)

Phase III: Long Term "Care Taker" Phase

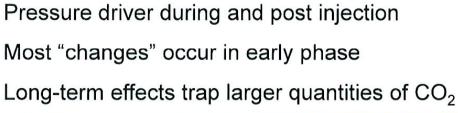


- When the operator is no longer the responsible party and the long term care taker role is assumed by government
- Costs in this phase covered by stateadministered trust fund.
- Funded by injection fee assessed to operator on per ton basis of CO₂ injected over life of project.

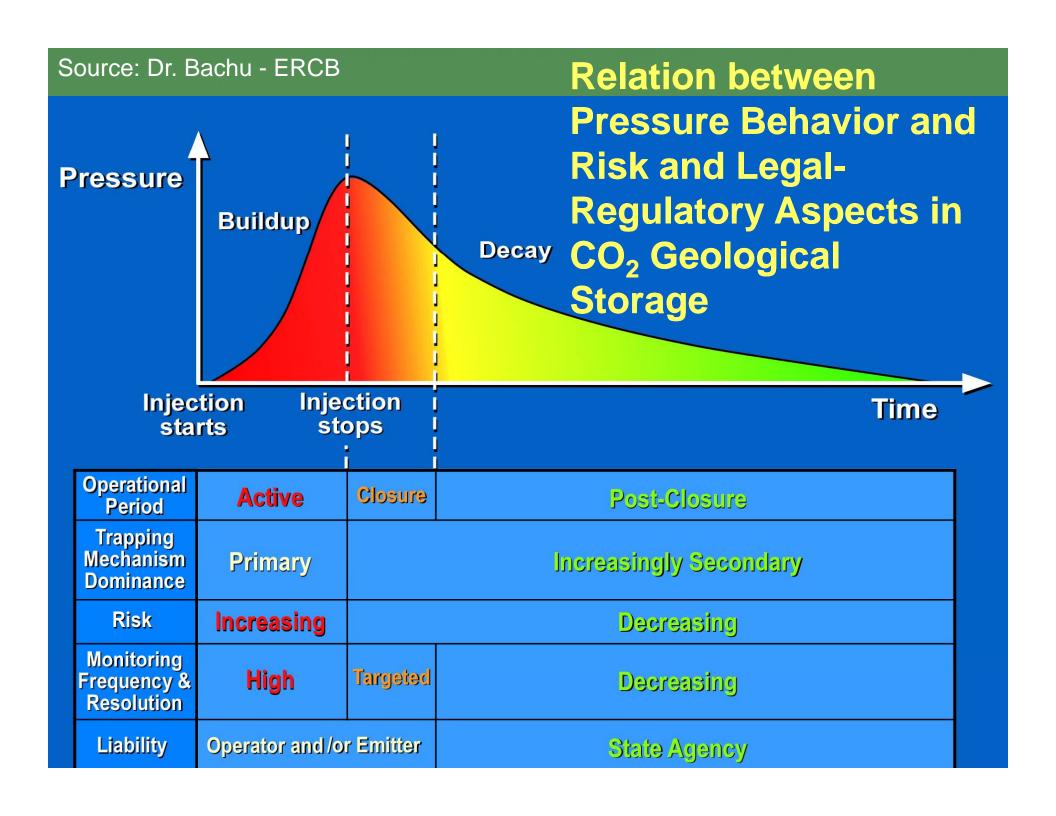
The risk timeline for leakage is heavily-laden in early times.



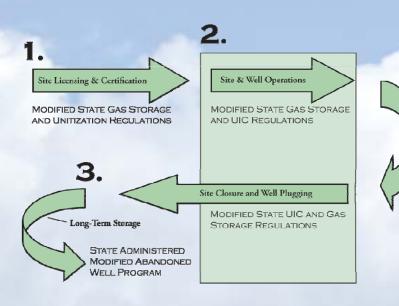
Why does it look like this?







EPA Regulatory Overlap





- Will ensure national consistency and protection of drinking water for operational phase
- State and EPA regulatory frameworks systems can work "seamlessly".

PROJECTED USEPA RULE DEVELOPMENT TIMELINE

- JULY 2008 PROPOSED RULE PUBLISHED -FOLLOWED BY 90 – 120 DAY PUBLIC COMMENT PERIOD
- 2009 (date uncertain) PUBLISH NOTICE OF DATA AVAILABILITY (NODA) – FOLLOWED BY 60 – 90 DAY PUBLIC COMMENT PERIOD
- 2010 (late) or 2011 (early) FINAL RULE PUBLISHED



ISSUES USEPA PROPOSED RULE WILL NOT ADDRESS

Due To Limitations in Federal Safe Drinking Water Act

- Overall Site Licensing, Property Right Issues,
 Eminent Domain (AOR modified to extend over entire area projected to be impacted by total volume of CO2 to be stored)
- Long Term "Caretaker" Responsibility (Post Closure Liability) for the time period beyond the established regulatory post closure period (Class I 30 years most likely analog)



Observations concerning Proposed EPA CS Regulations

- CO2 EOR will remain Class II under UIC
- CS wells will most likely be a <u>new class</u>, for which states will apply for primacy
- Regulations will <u>allow for conversion</u> from Class II to new storage classification – rule will define when storage begins and EOR ends
- Regulations will <u>not determine</u> if CO2 EOR will qualify for <u>CO2</u> <u>credit</u> – future federal or market based system
- Long-term "caretaker" role will not be addressed <u>Industry or</u> state role at present time if projects undertaken
- At present a <u>state with UIC primacy can permit CS wells</u> under UIC using existing or combination of UIC well classes.

Barriers to Deployment

- Policy development
- Public acceptance
- Economic and financial (high cost)
- Legal and regulatory
- Scientific and technological
- Capacity



States and Provinces Currently Developing Regulatory Systems Using IOGCC Model Legislation and Regulations

California Texas

Indiana Alberta

Michigan British Columbia

Montana Nova Scotia

New Mexico Saskatchewan

New York

North Dakota

Oklahoma



States Which Have Enacted CO2 Storage Legislation

- Illinois
- Kansas
- Ohio
- Utah
- Washington (also has draft rules out for public comment)
- West Virginia
- Wyoming



IOGCC Task Force – Next Steps

- The Guidance Document will continue to be perfected based on experience of the states and provinces.
- DOE and other funding sources sought to continue work of the Task Force.
- Task Force is continuing public outreach efforts and assisting states with legislation and rule development.



CONTACT INFORMATION

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Directorate-General for Energy and Transport



CCS Projects in Europe and the Issue of Finance

Kai TULLIUS Policy Officer – Coal and Oil

Content

- EU Policy Context: Energy and Climate Change
- Deploying CCS in Europe
 - » Legislative Framework
 - » Long Term Economic Viability







Policy Context

Objectives agreed for 2020

- 20% GHG reduction compared to 1990
 - » Independent commitment
- 20% reduction in primary energy consumption
- 20% renewables in energy mix
- 10% biofuels in transport
 - » If production is sustainable
 - If second generation biofuels commercially available





Policy Context

- 2007 Spring European Council
 - » target of 20% cut in greenhouse gas emission by 2020
 - » enabling low-CO2 power generation from fossil fuels by 2020
 - » up to 12 CCS demonstration plants in operation by 2015
- Summer-Autumn 2007
 - Evaluation and Impact Assessment period
- November 2007: Strategic Energy Technology Plan
 - » R&D efforts to focus on low carbon technologies
 - » CCS one of strategic technologies: large-scale demos next priority
- 23 January 2008: Commission adopts a set of proposals including the CCS Communication and the CCS Directive





Costs and benefits of CCS

Costs:

- » R&D (€1bn) and demonstration (€10-20bn) to reduce costs
- y further investment to roll out CCS on a wide-scale

Benefits:

- » 20-28% of the achievable global CO2 emission reductions by 2050 (IEA)
- » solution for both power generation and energy intensive industries
- for managing future CO2 emissions of dynamically developing coal users (China, etc.)

Policy goal = CCS commercially feasible by 2020:

- » CCS in retrofits and newbuild thereafter
- » capture-readiness in the meantime





Obstacles / EC Proposals

- Legislative Hurdles
 - CCS Directive
- Non legislative Hurdles
 - » Long term economic viability
 - Emission Trading System (ETS)
 - » Industrial Scale CCS Demonstration Projects (all main technology routes (Pre-, Post-, Oxyfuel-Combustion))
 - » General and Industry Awareness
 - » Public Acceptance
 - CCS Communication





CCS-Directive - 1

Enabling Framework

- Member States determine whether and where CCS will happen
- » Companies decide whether to use CCS on the basis of conditions in the carbon market

Objectives and Principles

- » Legislative Framework for managing environmental risks
- » Overcame existing legal barriers
- » Use existing frameworks where possible

Focus on Storage

- Capture regulated under IPPC Directive
- Transport regulated as for natural gas transport (by Environmental Impact Assessment and at Member state Level)
- Novel element is CO2 storage, main focus of proposes directive



Directorate-General

and Transport

Directorate-General for Energy and Transport

CCS Directive - 2

Content

- » Site Selection
- » Authorisation for Storage
- » Monitoring plan to confirm expected CO2 behaviour
- » Liability measures in case sites do leak
- > Transfer of Responsibility to the state
- » Access for third parties

CCS-not mandatory, but member states need to

- assure, that enough space is available on site to retrofit plant with capturing and compression facilities
- verify, if storage capacities and transport facilities are available and retrofitting is technological feasible
 - CAPTURE READINESS



EU Emission Trading System

ETS Phase III proposal

from 2013 full auctioning of CO2 certificates for the power sector

CCS under the ETS:

- » CO2 captured, transported and safely stored considered as not emitted
- » no allocation to capture, transport and storage
- » ETS allowances must be surrendered for any leakage
- » monitoring and reporting guidelines under preparation

ETS auctioning revenues

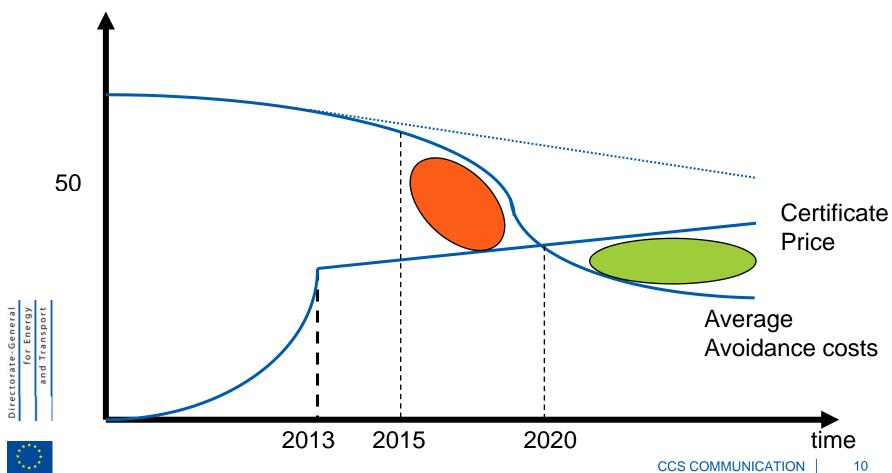
- » major potential source of funding for CCS demonstration projects
- » EC suggestion: 20% earmarking to low-CO2 technologies





Economic viability of CCS under ETS

Additional Cost for CCS, per ton CO2





Directorate-General for Energy and Transport

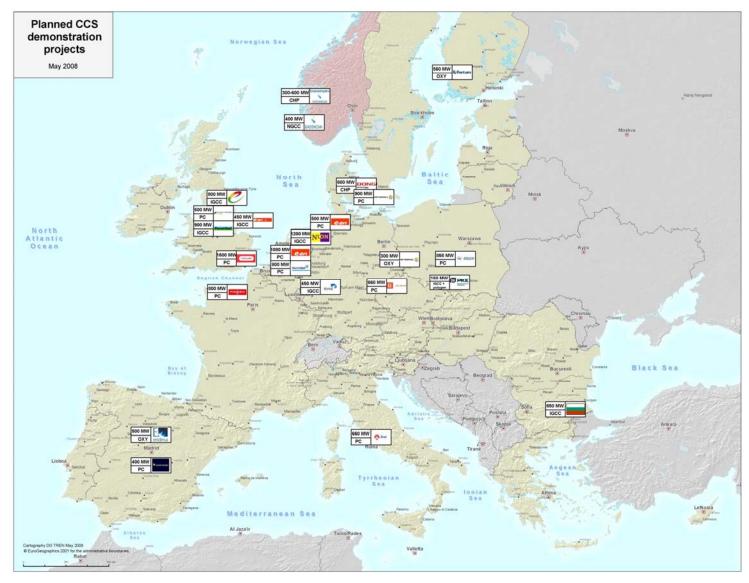
Financing CCS demonstration projects

- Economics of early demonstration
- Sources of financing
 - Industrial commitments
 - ETP-ZEP: a vital initiative with commitments to the issue
 - still needed: clear, early and decisive commitments by individual players to concrete large-scale demonstration
 - Member States' involvement
 - MS-level crucial given budgetary reality and size of challenge
 Commission guidelines facilitate state aid to CCS

 - ETS revenues + structural policies hinted as suitable
 - » EU-level financing
 - limited availability for the time being
 - FP7 + EU structural funds
 - EU financial institutions for specialized cases
 - Communication on financing low-carbon technologies



Potential CCS demonstration projects





Conclusion – Executive summary

CCS: priority of strategic importance

- » CCS can be commercially viable by 2020
- opportunities and challenges:

 - early effective demonstration
 timely and bold industry and public investment
 - market-based stimuli to avoid CO2 emissions

Commission / Council / EP:

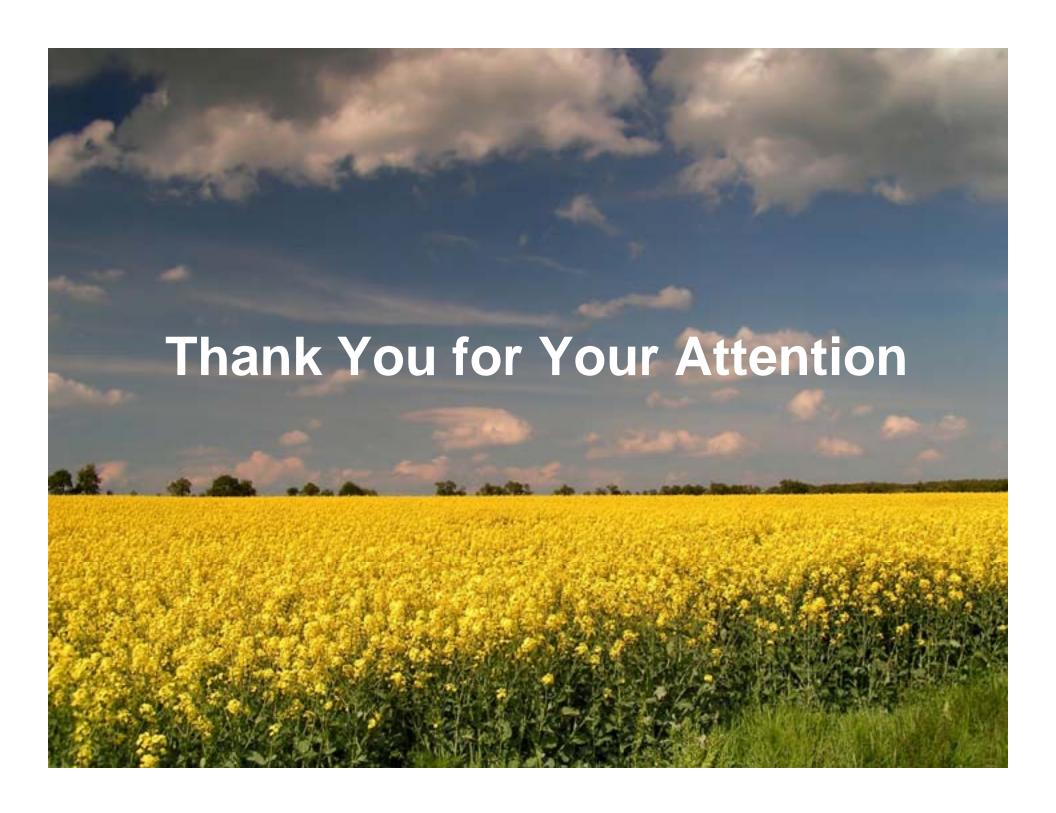
- » CCS regulatory framework
- CCS in ETS
- revised Community guidelines on state aid for environmental protection
- "revision of TEN-E guidelines (transport infrastructure)
- European Industrial Initiative on CCS

Early demonstrations

- major financial commitments
 - decisive commitments from industry to trigger public contribution
 - national schemes by Member States
- » continued R&D









Key Points from IEA Regulators Workshop Paris May 13-15, 2008

Conclusions of G8-IEA-CSLF Workshops: Need for regulatory certainty and resolution of key legal issues.

- Most countries will build on existing legal/regulatory frameworks.
 - Australia: Build on Offshore Petroleum Act of 2006; ETS in 2010
 - Canada: Action at both Federal and Provincial level (Alberta and BC)
 - United Kingdom: Storage offshore; government taking long-term liability
 - Japan: Storage offshore with environment ministry responsibility
 - Norway: Build on existing offshore oil and gas regulation.
- A level playing field is needed for CCS

Agenda

- The Role, Status and Financing of CCS as a Mitigation Option in the United States
 - Tom Wilson, Senior Technical Leader, EPRI
- Canadian Perspective on Financing CCS
 - Eric Beynon, ICO2N Group
- The IOGCC Guidelines on Permitting CCS
 - Lawrence Bengal, IOGCC
- CCS Projects in Europe and the Issue of Finance
 - Kai Tullius, Project Officer, European Commission
- Panel Discussion



GHG Markets and CCS – A Launch Pad, A Cash Flow, or a Clean Miss?

Dr. Mark C. Trexler
Managing Director, EcoSecurities Global Consulting
Services Group

London, May 28, 2008



EcoSecurities Business Profile

- > Originate, Implement, and Commercialize CERs 350+ projects
 - First registered CDM project (Nova Gerar, Brazil)
 - First issuance of CERs (La Esperanza, Honduras)
 - Ongoing sectoral and project R&D efforts
- > Originate, Implement, and Commercialize VERs
 - Stonyfield Farm, Shaklee, AES Power Direct, Climate Neutral Network, TransAlta, Sumitomo, Entergy, Fannie Mae
- > Inform, Support, and Implement Business/Market Strategies
 - TransAlta, PacifiCorp, SCE, PG&E, NWPCC, JPower, TEPCO, World Bank, Barrick Gold, Statoil, PEMEX, JBIC, Mizuho Bank, many others



Inform

Support

Implement

- > First Mitigation Deals in U.S. and Globally
- > Leaders in Project, PDD, and Methodology Development
- > Won First GHG Regulatory Proceeding
- > Designed a Major GHG Early Action Crediting Program for U.S.
- > Took First Company Climate-Neutral
- > Completed First Major GHG Offset Portfolio
- > Supported First Utility-Based GHG Business Unit
- > Developed First GHG Market Supply-Demand Model
- > Point Carbon Best CDM Project Developer 2006
- > Envtl Finance Best GHG Advisory Firm 2001 2006



A Local Presence in a Global Market





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- 1. Setting the Stage for CCS
- 2. Forecasting GHG Markets
- 3. How Does CCS Fit?



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1. Setting the CCS Stage



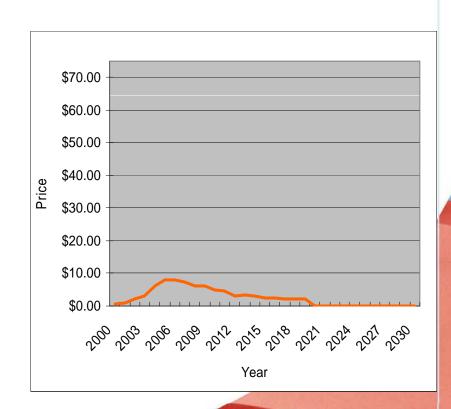
Will The Policy Pieces Fall Into Place?





Scenario 1 – Policy Stalemate

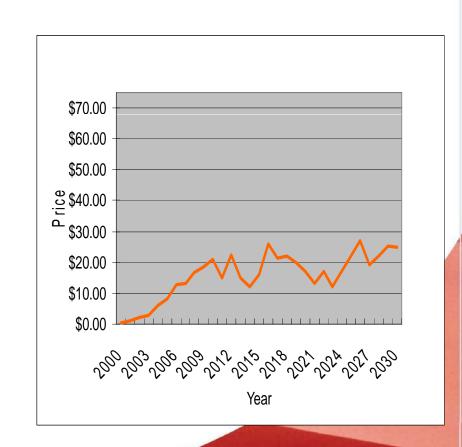
- Major Political and Economic Challenges
- > Could Challenges Lead to Stalemate in Int'l and Domestic Policy Momentum?
 - Absent a scientific reversal, hard to see
 - Broad public support for action on this issue
- > The Odds: Increasingly Low
- Note: Scenario Subject to Sudden Reversal





Scenario 2 - Political Status Quo

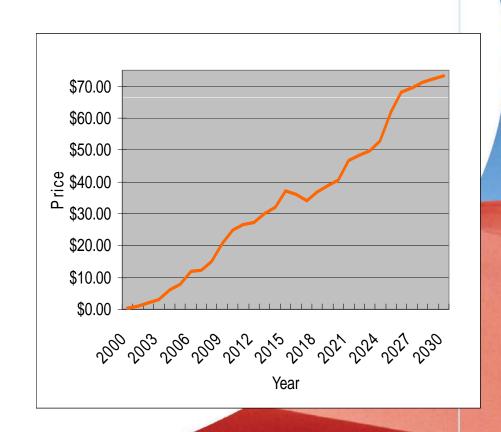
- > Issue is Here to Stay
 - Numerous policies and measures pursued
- > Will Affect Many Sectors in Material Ways
 - Range of Cost Estimates:
 \$5-30/ton CO₂
- > But Policy Unable to Achieve CO₂ Stabilization
- > The Odds: High
- Note: Scenario Subject to Sudden Reversal





Scenario 3 – Atmospheric Stabilization

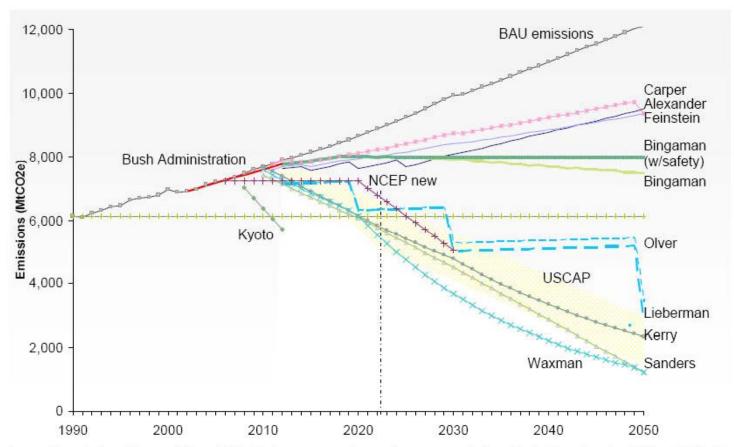
- > Political Will Exists to Tackle
 - Aggressive reductions
 - Aggressive technology
 - Aggressive markets
- > Material Economic Impacts
 - Stanford Modeling Forum:
 \$75-100/ton CO₂
- > The Odds: Modest at Best?





Proposed Federal GHG Bills

Comparison of US 2007 Climate Change Bills - Emissions versus Targets



Source: New Carbon Finance. Notes: BAU = business as usual greenhouse gas emissions; Projections based on EIA and BEA data, and NEF extrapolations; NCEP new = National Commission on Energy Policy's revised recommended targets; USCAP = US Climate Action Partnership's recommended targets.



The Context for CCS as a Key Option

- > In What Context is CCS Being Viewed?
 - Based on current market value of EOR CO2 (\$15)?
 - Based on simple cost of injection of almost pure CO2 (<\$10)?
 - Based on current carbon markets (\$5-10 voluntary, \$15-30 regulatory)?
 - Based on current (estimated) costs of capture through storage?
 - Pulverized coal: \$30-70
 - Gasified coal: \$15-55
 - Natural gas: \$40-90
 - There's a big gap between current CCS \$\$s, and current GHG \$\$s
- > There's a Big Gap Between Where CCS Wants to Go, and Market Has Gone So Far When it Comes to Technology Promotion
- > Can CCS Fit Into Carbon Markets? If So, How?

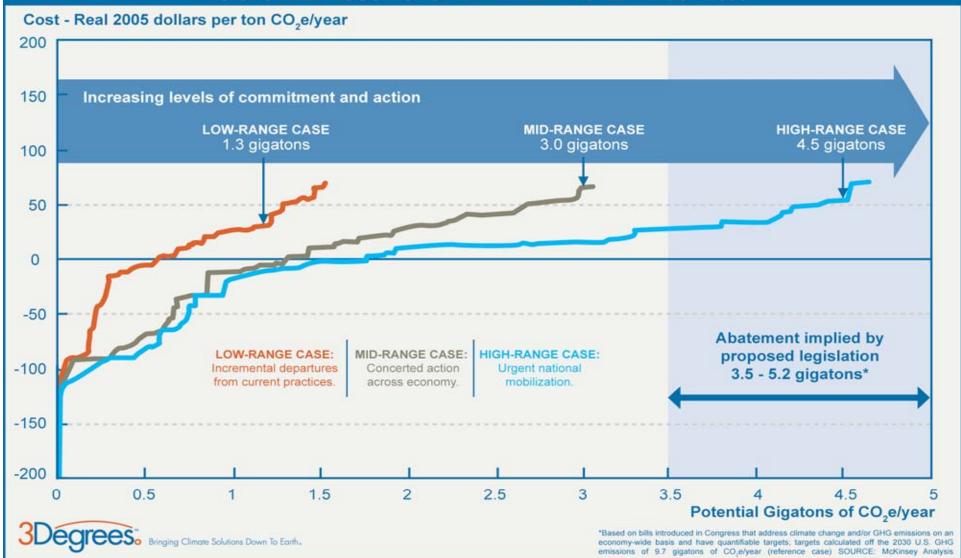


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2. Forecasting GHG Markets







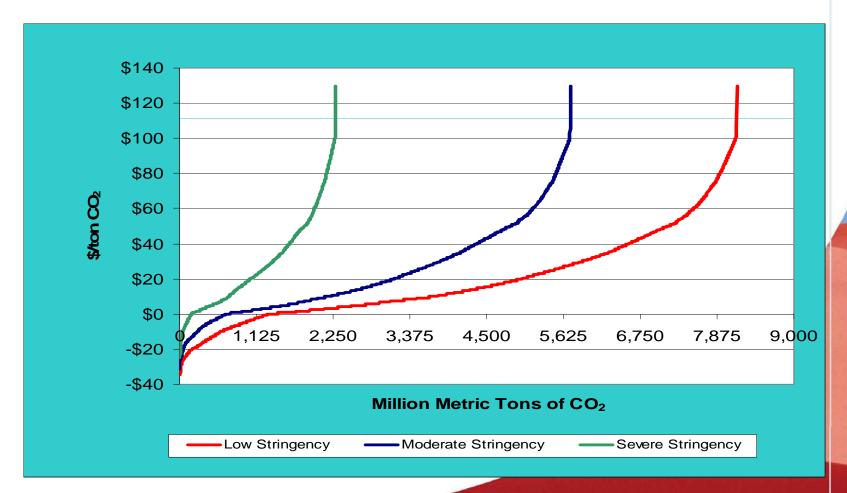


Market Variables

- > Context Variables
 - Science, media, public opinion, policy
- > Demand Variables
 - Growth, fossil prices, targets, U.S.- D.C. role
- > Technology Variables
 - Costs, R&D spending, deployment support
- > Supply Variables
 - What counts, how counted, rules, behavior, psychology
- > Transaction Variables
 - Costs, delays, taxes, certainty of rules



2010 GHG MAC Curve





Carbon Credit Price Forecasting

- While a Supply and Demand Approach Makes Sense...
 - Demand is (obviously) largely a function of policy decisions
 - But (much less obviously) so is supply
 - What is a "credit"?
 - How are "credits" qualified?
 - How are "credits" quantified?
- > This Makes the GHG Commodity Very Different
 - Price forecasting meaningless w/o policy context
 - Can't think of as predictable commodity
- > There is an Upside. Carbon Markets are Policy Markets, and We Could Use Them Accordingly



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3. How Does CCS Fit?



From the Carbon Market's Perspective

As We Resolve the Technical Issues, How Should We Be Anticipating CCS's Role in Carbon Markets and Business Decisions?



Will The CCS Puzzle Fall Into Place?





How to Think About CCS?

- > Carbon Market Financing Very Susceptible to Risk, Uncertainty
 - Timing, risks, capital commitments?
- > Carbon Markets Very Unlikely to Overcome This Uncertainty
 - Overcoming "Mountain of Death" will require subsidies, risk offloading
 - Front loading an interesting option(s), but faces real obstacles, even though perfectly legitimate in a "policy market"
- > If You Build It, Will They Come?
 - CCS plausibly fits into a plausible GHG supply curve
 - But, there are "disruptive" technologies out there (oceans, REDD, nuclear)
 - And A LOT starts to happen at \$30/ton, and at \$130/barrel oil that may compete with CCS



So What's The Answer?

- > So It All Comes Back to Policy, Expectations About Policy, Associated Market Demand, Supply, and Expectations About Supply
- > If We Really Believed That CO2 Would Soon Have a Value of >\$50/ton in the Relatively Near Term, The World Would be a Very Different Place
- > Carbon Market as a Launch Pad? Highly Unlikely
- > Carbon Market as a Cash Flow? Much More Possible
- > Carbon Market a Clean Miss? Hopefully Not, but Possible



For More Information

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- > www.ecosecurities.com

A Trust Fund Approach for Accelerating the Demonstration and Adoption of CCS

Edward S. Rubin
Department of Engineering and Public Policy
Carnegie Mellon University
Pittsburgh, Pennsylvania

Presentation to the

Expert Meeting on Financing Carbon Capture and Storage Projects New York, NY

May 28, 2008

Outline of Talk

- The need for full-scale CCS deployment
- Why the urgency?
- Options for accelerating CCS deployment
- A CCS Trust Fund approach
- Where do we go from here?

Premise

- Coal-based power plants will continue to provide the major share of electricity demand for decades to come
- Large reductions in CO₂ emissions from such plants are urgently needed to address global climate change
- Only CCS has promise to enable significant continued use of coal while addressing global climate change

The need for full-scale CCS deployment

Deployment is Needed to . . .

- Establish the reliability and true cost of CCS in utility applications at commercial scale, for:
 - Alternative technologies (PC, IGCC; new, retrofit)
 - Different coal types (bituminous, sub-bit, lignite)
 - Different geological settings
- Establish the legal and regulatory requirements for geological sequestration at significant scales
- Reduce future cost of CCS via learning-by-doing plus sustained R&D

The Good News

• A variety of CCS projects are underway or planned in different parts of the world

But ...

- Only a small number of coal-fired power plant projects are currently funded at large-scale
- Full funding is still uncertain (to differing degrees) for most/all(?) proposed large projects

| Project Name | Location | Feedstock | Size MW | Capture Process | CO2 Fate | Start-up |
|--------------------------|-----------|--------------|-------------|--------------------|-----------|-----------|
| Total Lacq | France | Oil | 35 | Оху | Seq | 2008 |
| Vattenfall Oxyfuel | Germany | Coal | 30/300/1000 | Оху | Undecided | 2008 |
| AEP Alstom Mountaineer | USA | Coal | 30 | Post | Seq | 2008 |
| Callide-A Oxy Fuel | Australia | Coal | 30 | Оху | Seq | 2009 |
| GreenGen | China | Coal | 250/800 | Pre | Seq | 2009 |
| Williston | USA | Coal | 450 | Post | EOR | 2009-15 |
| NZEC | China | Coal | Undecided | Undecided | Seq | 2010 |
| E.ON Killingholme | UK | Coal | 450 | Pre | Seq | 2011 |
| AEP Alstom Northeastern | USA | Coal | 200 | Post | EOR | 2011 |
| Sargas Husnes | Norway | Coal | 400 | Post | EOR | 2011 |
| Scottish& So Ferrybridge | UK | Coal | 500 | Post | Seq | 2011-2012 |
| Naturkraft Kårstø | Norway | Gas | 420 | Post | Undecided | 2011-2012 |
| ZeroGen | Australia | Coal | 100 | Pre | Seq | 2012 |
| WA Parish | USA | Coal | 125 | Post | EOR | 2012 |
| Coastal Energy | UK | Coal/Petcoke | 800 | Pre | EOR | 2012 |
| UAE Project | UAE | Gas | 420 | Pre | EOR | 2012 |
| Appalachian Power | USA | Coal | 629 | Pre | Undecided | 2012 |
| Wallula Energy | USA | Coal | 600-700 | Pre | Seq | 2013 |
| RWE npower Tilbury | UK | Coal | 1600 | Post | Seq | 2013 |
| Tenaska | USA | Coal | 600 | Post | EOR | 2014 |
| BP Rio Tinto Kwinana | Australia | Coal | 500 | Pre | Seq | 2014 |
| UK CCS project | UK | Coal | 300-400 | Post | Seq | 2014 |
| Statoil Mongstad | Norway | Gas | 630 CHP | Post | Seq | 2014 |
| RWE Zero CO2 | Germany | Coal | 450 | Pre | Seq | 2015 |
| Monash Energy | Australia | Coal | 60 k bpd | Pre | Seq | 2016 |
| Powerfuel Hatfield | UK | Coal | 900 | Pre | EOR | Undecided |
| ZENG Worsham-Steed | USA | Gas | 70 | Оху | EOR | Undecided |
| Polygen Project | Canada | Coal/Petcoke | 300 | Pre | Undecided | Undecided |
| ZENG Risavika | Norway | Gas | 50-70 | Оху | Undecided | Undecided |
| E.ON Karlshamn | Sweden | Oil | 5 | Post | Undecided | Undecided |

The Bad News

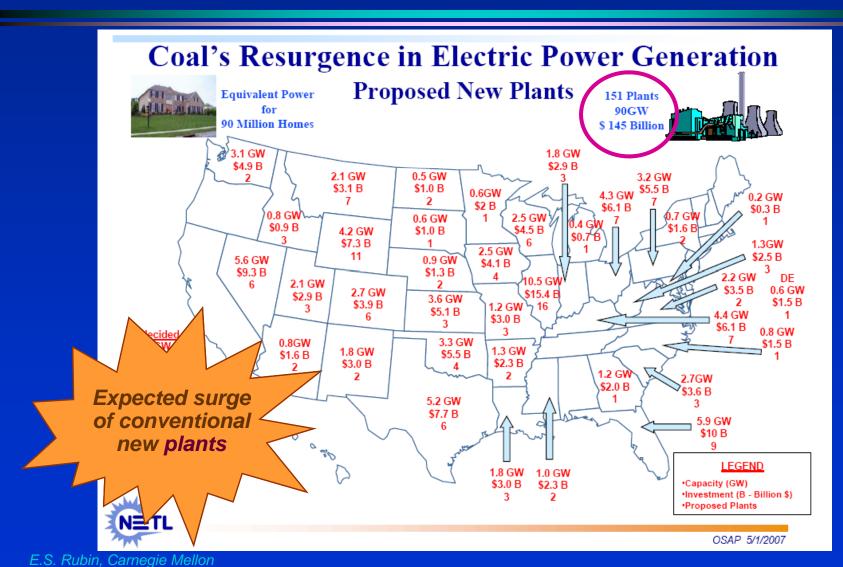
CCS Project Cancellations, 2007–2008

| Project | Location | Technology | CCS Type | Developers |
|------------|----------|-------------------|---------------|--------------------|
| FutureGen | USA | 275 MW coal IGCC | Pre-/ Aquifer | FG Alliance, DOE |
| Clean Coal | Canada | 450 MW lignite PC | Oxy-/ Geol. | SaskPower + others |
| Peterhead | UK | 475 MW gas IGCC | Pre-/ EOR | BP, SSE |
| Halten | Norway | 860 MW gas NGCC | Post-/ EOR | Statoil, Shell |

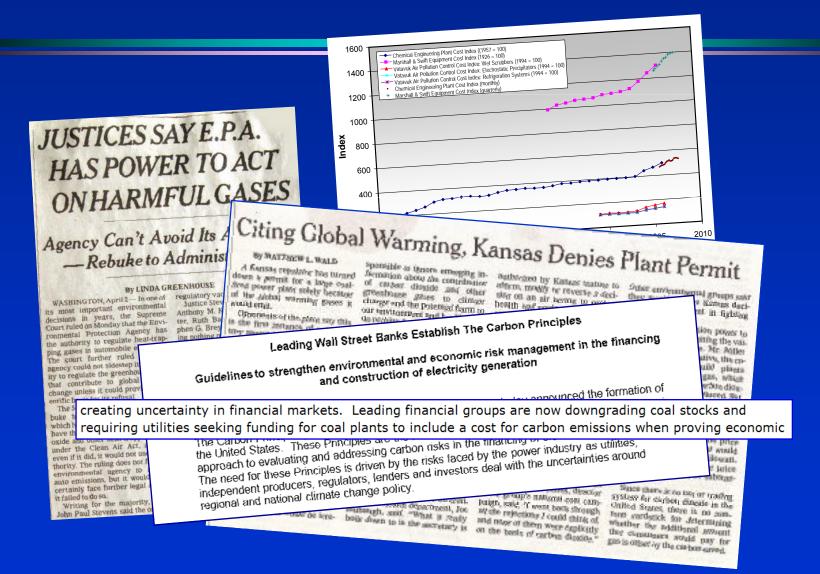
No certainty that currently proposed projects will be fully funded and completed as planned

Why the urgency?

Remember the Good Old Days? (One year ago!)



What a Difference a Year Makes



Opposition to conventional coal has become more vocal

Want to Stop Global Warming?

Stop Coal.



Strangers as Allies

ght Against Coal Plants Is Creating Diverse Partnerships

Don't fund global warming.

Stop investment in all new coal-burning power plants. Cool-butting power plans are the world's largest greenhouse gos polluters and a flirest chross to our future. Yet possitions financial institutions, including JPM-regar Chare, Coldman Sects. to ess ruture, see prominent manages management, memoring presurgue varant, volumes seens, Cingroup, Morgan Stanley, Merrill, Lynch, Credit, Suisse, and Lebinan Brochers, are enger to Subgroup, nongain somety, nutries, aparties, areancourse and Leonara unreasers, and eggs to Guanes, their construction. The truth is every dollar invested in seal is a dollar than could be lavested to energy efficiency and wind, and solar proved. Help us make sure these cont-burning sovered in energy enciones and wind and user power, they as more sure times consourcing power plants are never built. Tell Well Street that lorsesting in coal is simply one risks. Voit www.cam.org to join the light.



There are over

THE NEW YORK TIMES OP-ED FRIDAY, MARCH \$3, 2006

Wite early are that reflece our Energy Intensity by the group the many are advecating?

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Stop Global Warming.

What can I do, the cool holds is too powerce!"

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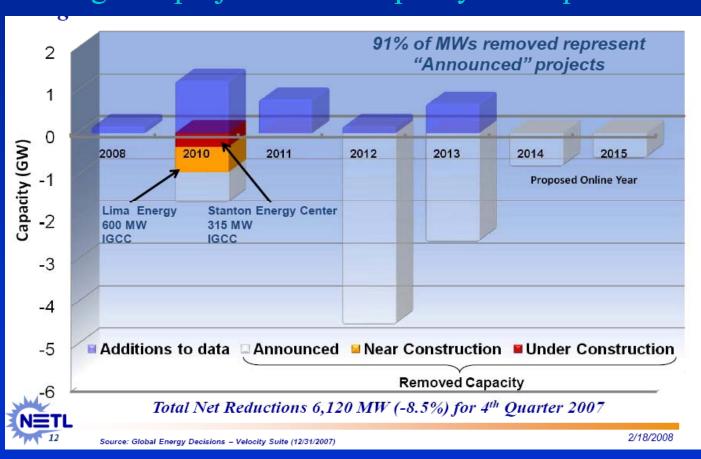
quanting electrical energy meeds?

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irchitecture 2030 info@architecture2030.org www.architecture2030.org

Many Projects Now Being Cancelled

Changes in projected U.S. capacity in 4th quarter 2007



The U.S. Outlook

- It will be very difficult—and perhaps impossible—to undertake large new coal-fired power projects that do not include CO₂ capture and sequestration
- Reserve margins soon will be compromised in several parts of the country if no new plants built

So ...

• Learning sooner rather than later what CCS really costs, and how well it really works in full-size utility applications, is an urgent priority!

How can we accelerate funding of large-scale CCS projects?

Options for Accelerating CCS

- Expand traditional "technology policy" options (e.g., tax credits, subsidies, etc.)
 (as in Energy Policy Act, USDOE CCTI program, etc.)
- Set new regulations requiring CCS (e.g., generator CO₂ performance standards) (as in California CO₂ stds, NSPS for major pollutants, etc.)
- Adopt sufficiently stringency cap-and-trade program w/ CCS bonus allowances and/or a tech. fund (e.g., from auction of allowances) (as in Lieberman-Warner bill and others.)
- Establish a CCS Trust Fund with fees used to pay full added cost of early CCS projects (proposed here; under consideration by Congress and EPA)
 - Focus of this study is on the Trust Fund option —

Why a Trust Fund?

Advantages of a CCS Trust Fund

- Can raise large amounts of money via small fees on the use of coal for power generation (historical gov't. incentives are insufficient and not reliable)
- Not coupled to stringent CO₂ reduction mandate
 can start rapidly with well-defined revenues

 (accelerates learning and significantly reduces future costs)
- Can ensure that funds will benefit payees (all coal-based entities benefit, making fees more tolerable)
- Can ensure reliable multi-year funding stream (avoids annual appropriation process by imposing fees not taxes)
- Managed by independent (or quasi-public) entity (can employ private-sector standards for contracting and hiring)

Examples of U.S. Trust Funds

- *The Highway Trust Fund*. Created to finance interstate highway system; supported by automotive fuel taxes
- Abandoned Mine Reclamation Fund. Projects administered through the U.S. Department of Interior Office of Surface Mining
- *Ultra-Deepwater and Unconventional Natural Gas and Other Petroleum Resources*. Fund managed by a consortium of stakeholders (called RPSEA) under DOE oversight
- Tobacco Master Settlement Agreement. Payments and outlays managed by a private entity (National Association of Attorneys General)
- The Propane Education and Research Council. A privately administered fund created to support industry R&D and outreach

Lessons Learned from Past Programs

- Self-financing is necessary for costly programs
- Clear objectives must be established, and fees should terminate once objectives are reached
- Avoid the annual federal appropriations process (to ensure reliability of funding; impose fees not taxes)
- Use an independent or quasi-public entity (allows private-sector contracting and hiring standards)

How Would It Work for CCS?

- A CCS Trust Fund would be established to pay the full incremental costs of installing and operating CCS systems at a selected number of coal-based plants
- Costs would be supported by a fee on coal-based (or other types of) electricity generation or fuel use
- The Fund would be managed by an independent (quasipublic) group that would select, fund and manage appropriate projects to meet program goals
- Results and experience would be shared widely
- The Fund would terminate after a fixed period of time

Proposed Program Elements

• CO₂ Sources:

- Commercial power generation units (~ 400 MW_{net})
- Optional storage-only projects at large industrial sources with high-purity CO₂ vents (e.g., ethanol plants, ammonia and fertilizer plants, natural gas processing plants, etc.)

• Incremental costs to be covered:

- Capital costs to install capture equipment
- Reimburse loss of net generation capacity
- Additional plant O&M costs (~5 years)
- CO₂ transport and injection costs (~5 years)

What Would It Cost?

• Total incremental cost of building and operating CCS at a 400 MW_{net} plant—including cost of the "energy penalty" (replacement power) plus CO₂ transport and aquifer storage costs for 5 years:

\approx 0.7 to 1.0 billion USD per project

Cost of additional projects using existing CO₂ from industrial sources (compression, transport, storage)
 ≈ 100 million USD per project (based on 2 MtCO₂/yr for 5 yrs)

Average Initial Cost of Projects

(Millions of 2006 U.S. dollars per ~400 MW plant)

| Per Plant Incremental Costs of CCS | Based on New Plants | Based on Plant Retrofits |
|------------------------------------|------------------------|-----------------------------|
| Capital Costs | | |
| - Capture equipment | \$210 | \$250 |
| - Net capacity loss | \$185 | \$360 |
| Plant O&M Costs | \$150 | \$150 |
| Transport, Storage; Admin. | \$190 | \$190 |
| TOTAL (per plant) | \$735 | \$950 |

Source: Kuuskraa, 2007

Total costs and fees evaluated for two program levels

Smaller-Scale Program

- Scope: 10 power plants (different plant types, coals, capture systems, storage sites); +5 industrial sites; ~10-year program
- Objectives
 - Establish true cost and reliability of CCS options
 - Obtain design and integrated CCS operating experience
 - Develop public and regulatory experience with CCS
- Cost
 - \$8-10 billion: \$0.4 to \$0.5 per MWh (~\$1B/yr) (based on current coal-fired generation and a 10-yr program)
 - Increase for average residential household ≈



Larger-Scale Program

- Scope: 30 power plants (multiple "generations" of plants and CCS technologies); +10 industrial sites; 10–15 year program
- Additional Objectives
 - Significantly reduce CCS costs and generation losses
 - Build public confidence in technology and regulations
 - Reduce emissions by 100 MtCO₂/yr by end of program
- Cost
 - \$23–30 billion: \$1.2 to \$1.5 per MWh (\$2–3B/yr) (based on current coal-fired generation and a 10-yr program)
 - Increase for average residential household ≈



per day

Program Design Issues

- Administrative structure of the Fund
- Who pays the fee?
 - Only coal-fueled units?
 - Only fossil-fuel based generation?
 - All electricity providers/purchasers?
 - Only units with CO₂ above a specified level or rate?
- What mix of projects to support (and when)?
 - Technologies (PC, IGCC; pre-, post, oxyfuel)
 - Plant vintages (new, retrofit, repower)
 - Coal types (bituminous, sub-bituminous, lignite)
 - Sequestration sites & type (aquifers, EOR; regional mix)
- Options for cost-sharing, re-payment, etc.

Pew Center Evaluation Criteria

Policy options evaluated based on their:

- Effectiveness in reducing emissions
- Cost and cost-effectiveness
- Familiarity (precedents)
- Equity (regions, firms, technology)
- Ease of implementation
- Timing of implementation
- Linkage to other policies
- Impact on utility coal use

Details Described in Recent Reports (Available at: www.pewclimate.org)

Coal Coal iative Initiative ports Reports per Series White Paper Series A Pregram to Accelerate the Deployment of CO₂ Capture and Storage (CCS); A Trust Fund Approach to Accelerating Rationale, Objectives, and Costs Deployment of CCS: Options and Considerations Vello A. Kurakkia, President, Advanced Resources International. Joc. Naomi Pvika, Pew Certist on Global Climate Charge Edward S. Rubin, Garnegle Artifan University. Engineeristal singinuaring and Science Global

Recent Support

- "Congress should immediately create a CCS Early Deployment Fund... The quasi-governmental Fund would ... generate \$1 billion annually [to] cover the additional costs of CCS for at least 5 to 10 full-scale early commercial demonstrations of various technologies [at mainly] coal-based electricity generators."
 - Recommendation of the USEPA Advanced Coal Technology Work Group (an independent advisory group), January 2008
- "Reps. Rick Boucher (D-VA), John Murtha (D-PA), and Nick Rahall (D-WV) are drafting legislation that would create a multibillion dollar fund to encourage the use of CCS technology at power plants. Under the plan, a small fee would be imposed on electricity users and the proceeds would be kept outside of the Congressional appropriations process."
 - -Van Ness Feldman, Washington, DC, April 2008

Where do we go from here?

Take-Home Messages

- There is an urgent need to demonstrate at large scale a range of integrated CCS technologies at coal-based power plants (>10 projects at >100 MW_e)
- Current government and industry programs do not provide the level of funding that is required
- We need to aggressively pursue additional options to raise roughly \$10–30 billion to support selected and carefully-timed projects over the next 10–15 years
- A CCS Trust Fund supported by fees on electricity generation merits attention as an option for doing this quickly and effectively

Comments Welcomed

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This work was supported by the Pew Center on Global Climate Change, with major contributors by Naomi Pena (Pew Center) and Vello Kuuskraa (Advanced Resources International, Inc.)

CCS and US Capand Trade And Trade Proposals

By Robert M. Sussman
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Current Status of CCS Under USLaw

- CCS at demonstration project stage in US
- Little incentive now to install CCS at new coal plants
 - □ Capital cost increases
 - Reduced efficiency and output
 - ☐ Higher electricity costs
 - Uncertainties about technology
 - Liability concerns
- CCS not likely to move forward until drivers/incentives change



A New Policy Framework to Push CCS Forward

- Overall Challenge:
 - How do we put in place policy drivers that change economic calculus of plant developers and spur adoption of CCS?
- Key focus in US:
 - □ Using cap-and-trade programs to encourage CCS
- Key policy question:
 - Will putting a price on carbon under allowance trading system eliminate current economic barriers to CCS and drive deployment?



S. 2191 – Lieberman-Warner Climate Security Act

- Leading US legislative proposal will be considered by US Senate starting on June 2
- Recently modified by Boxer Substitute (S. 3036)
- Establishes cap-and-trade system covering 87 percent of US emissions
- Would achieve US emission reductions below 2005 levels of –
 - □ 17-19 percent by 2020
 - □ 57-63 percent by 2050

How Does Cap-and-trade Work under S. 2191?

- Year-by-year reduction in allowable emissions by covered sources (the "cap")
- Covered sources must hold allowances equal to their emissions. They include:
 - Upstream producers/importers of petroleum and natural gas must hold allowances for downstream emissions
 - Users of coal (electric utilities) -- must hold allowances for direct emissions from coal combustion
- EPA establishes an Emission Allowance Account for each calendar year
 - □ Total allowances decline as yearly cap declines
 - □ 5.775 billion allowances in 2012 declining to 1.732 billion in 2050
- Allowances can be bought, sold or held by anyone



How Allowances Are Distributed

- L-W distributes allowances by ---
 - □ Free allocation to certain entities and
 - □ Annual auction process
- Auction conducted by Environmental Protection Agency
- Percentage of allowances auctioned increases over time
 - □ 26.5% in 2012
 - □ 41% in 2022
 - □ 69.5% in 2031



Free Distribution of Allowances to Industry ("Transition Assistance")

- Portion of total allowances distributed for free to industry declines over time
 - □43% in 2012
 - □ 28.5% in 2022
 - □ 0% in 2031
- Largest share of free allowances goes to
 - □ Fossil-fueled power plants (18%)
 - □ Carbon intensive manufacturing (11%)



Use of Auction Revenues

- Revenue stream will grow as allowance prices and size of auction increase
- One estimate is that auction revenues will be
 - □ 38B in 2012
 - □ 63B in 2022
 - □ 111B in 2030
- Auction revenues will be used for multiple purposes, including
 - □ Tax relief for energy consumers
 - Deficit reduction
 - Advanced technology deployment



Would Cap-and-Trade Alone Promote CCS?

- Cost per ton of CCS is estimated to be ~ \$40-55
- US Environmental Protection Agency projects that allowance prices under S. 2191 will be:
 - □ \$17 per ton in 2012
 - □ \$28 per ton in 2020
 - □ \$37 per ton in 2025
 - □ \$46 per ton in 2030
- CCS will likely not be cost-competitive with other options before 2030
- It would be more economic to build an uncontrolled conventional coal plant and offset emissions by purchasing allowances
- CONCLUSION: Even with cap-and-trade, carrots and sticks are needed for wide deployment of CCS and to discourage conventional coal plants

Going Beyond Cap-and-Trade: Three Mechanisms to Accelerate CCS Deployment

- Issue free bonus allowances
- Require CCS through emission performance standard for new plants
- Provide subsidies using revenues from auctioning of allowances



Bonus Allowances under S. 2191: Program Details

- "Bonus allowances" issued to reward CO2 capture and storage
- 3-4% of total allowances set aside
- Program expires in 2039
- Number of allowances awarded based on "bonus rate"
 - Starts at 2 allowances per ton sequestered
 - ☐ Gradually declines to zero in 2040
- Facilities must capture at:
 - □ 60% rate for facilities beginning construction before 2018
 - 85% rate if construction starts after 2018
- Bonus allowances distributed for 10 years after start of plant operations



Bonus Allowances: Rationale

- CCS will be accelerated because dollar value of allowances will close "cost gap" between CCS and uncontrolled plants
- But how will bonus allowances really work?
 - □ How much CCS would we get and at what cost?
 - □ Are the incentives too great or not great enough?
 - □ Would conventional coal plants still be built?



Bonus Allowances: CAP Critique

- Would subsidize a limited amount of new coal through 2030 (around 80 Gigawatts)
- Bonus allowances for all plants would be worth \$60-80 billion between 2012 and 2030 (EPA allowance price projection)
- Bonus allowance subsidy is greater than necessary to close "cost gap" between CCS and regular coal
- If allowance prices are higher than predicted, bonus allowances would be worth even more
- Windfall allowances could be used to offset emissions at existing coal plants and delay reductions
- New plants could still be built without CCS



Emission Performance Standard Proposed by CAP

- Would require new coal plants to capture and sequester emissions at level of best performing CCS technology
- Would apply to all plants entering construction after date of enactment of legislation (2008)
- Would provide flexibility in timing of CCS implementation
 - □ Plants would implement CCS by 2016 or four years after start of operations, whichever is later
 - Phase-in would provide lead-time for demonstration projects and site testing
 - □ Many experts believe CCS will be ready for wide deployment by 2020



Closing the Cost Gap through Subsidies

- Subsidies would perform same function as bonus allowances
 - provide "carrots" for CCS deployment
 - □ Offset higher costs of building/operating coal plants with CCS
- Subsidy should cover cost gap between CCS and conventional plants, including cost of purchasing allowances – but NOT provide windfall
 - With emission performance standard, no need to pay "premium" to encourage CCS
- Subsidy should decline over time as price of carbon rises and cost of technology goes down
- Subsidies could only be used for CCS would NOT provide free allowances to offset emissions at existing plants



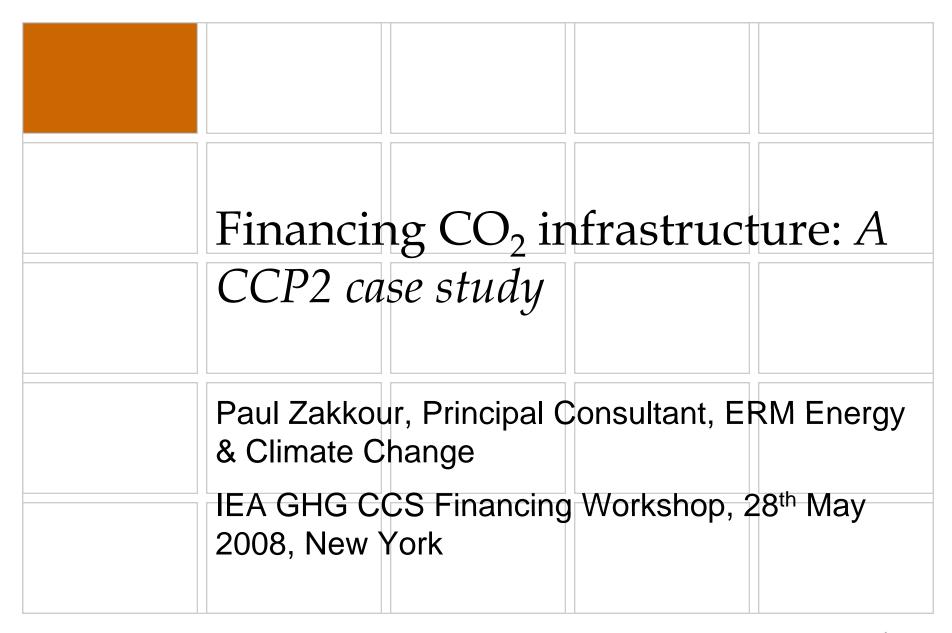
How to Pay For Subsidies

- Best revenue source: allowance auction proceeds under cap-and-trade program
- CAP estimate: Can subsidize 150 GW of new coal capacity for \$29 billion between 2016 and 2030
- Cost of subsidy much lower than cost of bonus allowances
 - Reason: No windfall above actual cost differential
- Subsidies from auction proceeds could also be used for existing plant retrofits
- Latest version of L-W would provide \$15.7 billion from auction proceeds to kickstart CCS demonstration projects
 - But full-scale deployment would be encouraged by bonus allowances



Conclusions

- Cap-and-trade will not automatically result in CCS and discourage conventional coal
- "Carrots" needed to close CCS cost gap
- Free bonus allowances will produce windfalls for some plants but not necessarily fund large-scale deployment
- Door still open for conventional coal
- Best approach: performance standard requiring CCS for new plants plus subsidy to close cost gap
- Best source of subsidy: Revenues from auctioning of allowances





Overview of work plan

• Aim:

 To assess financial aspects of building CO2 pipeline networks including backbone pipelines

• Tasks:

- 1. Review O&G financing models via case studies
- Review public/private project financing models via case studies
- 3. Assess simple business models for CO2 pipeline networks
- 4.Interview financial service industry personnel on CCS financing perspectives

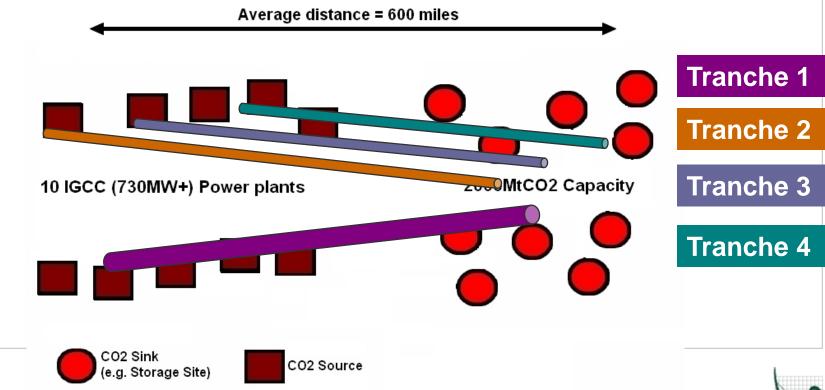


Assumptions and scenarios

Option 1:

Point to Point Pipelines

- 1 x 24 inch pipeline (tranche 1)
- 3 x 18 inch pipelines (tranches 2, 3 and 4)

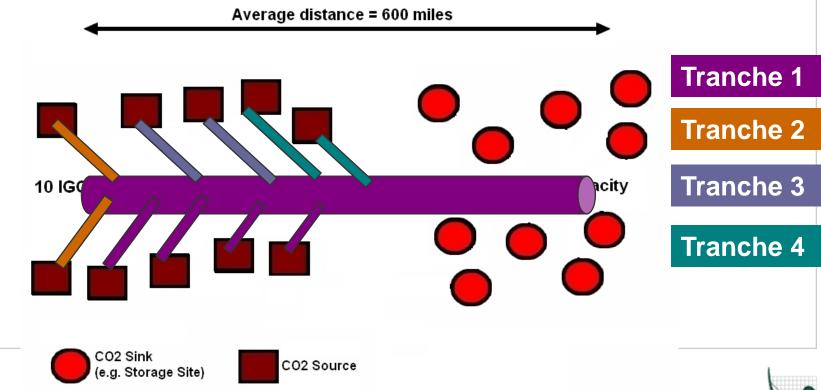




Assumptions and scenarios

Option 2:

Backbone network1 x 34 inch pipelinefor all tranches





Assumptions and scenario

| Project time length | 20 years (financial), 40 years (operational) (i.e. this does not influence cash flows and NPV) Cost of service calculated for each option at zero 20 year NPV | |
|--|---|--|
| Cost of Equity | 15% | |
| Cost of Debt | 9.57% (Libor + 4%) | |
| Financing base case Other casess | Base: 70% debt, 30% equity Balanced: 50% debt, 50% equity High Equity: 30% debt, 70% equity Public Private Partnership (PPP): 10% equity, 40% debt, 50% govt bonds Government Funding: (Govt guaranteed bonds 100%) | |
| CO2 Supply Scenario | 10 IGCC Power Plants (730MW+), connecting in 4 tranches: Yr 1 – 4 plants, Yr 3 – 2 plants; Yr 5 – 2 plants; Yr 7 – 2 plants. | |
| CO2 Pipeline Development Options/Scenarios | 1) Point-to-point pipelines: each tranche develops a pipeline at 98% utilisation. | |
| | 2) Backbone pipeline: the developer of tranche 1 develops network with the option for subsequent tranches to connect, to reach 98% utilisation | |
| CO2 Sink Scenario | 45 Injection wells in one or more geological formations (O&G fields) with total storage capacity ~2000 MtCO2 | |
| Assumed Actual/Max Injection Rate | 1.1/1.3 MtCO2/yr | |

1st mover disadvantage to build backbone

| Pipeline option | Capex | Capex required |
|---------------------------|--------------------------|-------------------|
| | (for all tranches; \$ M) | (in year 1; \$ M) |
| Option 1 (point to point) | \$3,112.7 | \$1,030.9 |
| Option 2 (backbone) | \$2,321.8 | \$1,560.6 |

Overall system development cost much higher for point-to-point deployment (\$1.2 billion)

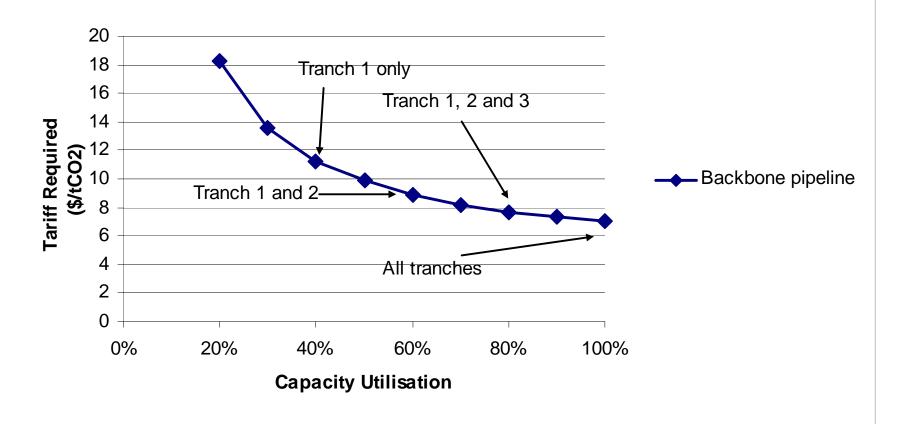
Significant capex burden on early mover (ie. Tranche 1) - \$0.5 billion extra CAPEX required

Significant additional capital costs imposed on first mover (i.e. tranche 1), which could affect financing capability



Sensitivity to reduced capacity utilisation

Cost of service for different capacity utilisation for option 2

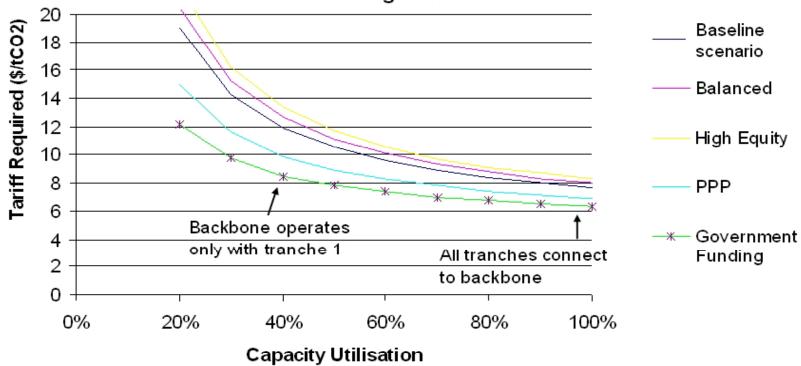


If later tranches are not realized, significant risk for early mover. Cost of service much higher (\$11.3)



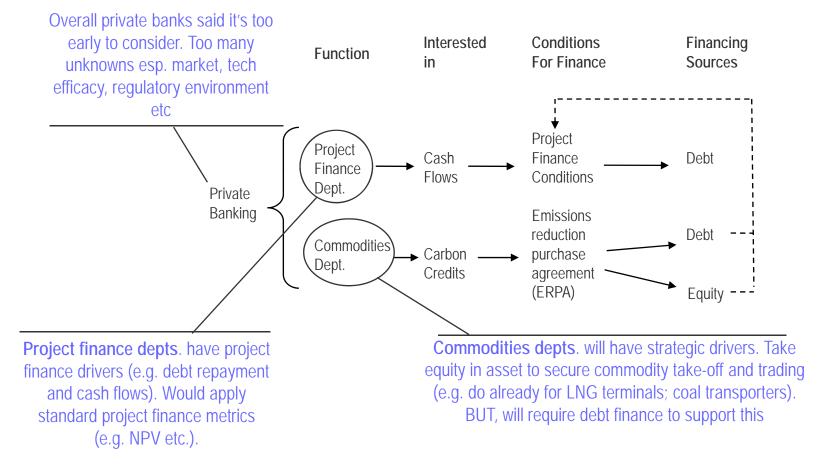
Sensitivity – alternative financing mech's

Cost of service for different capacity utilisation for option 2 under various financing scenarios



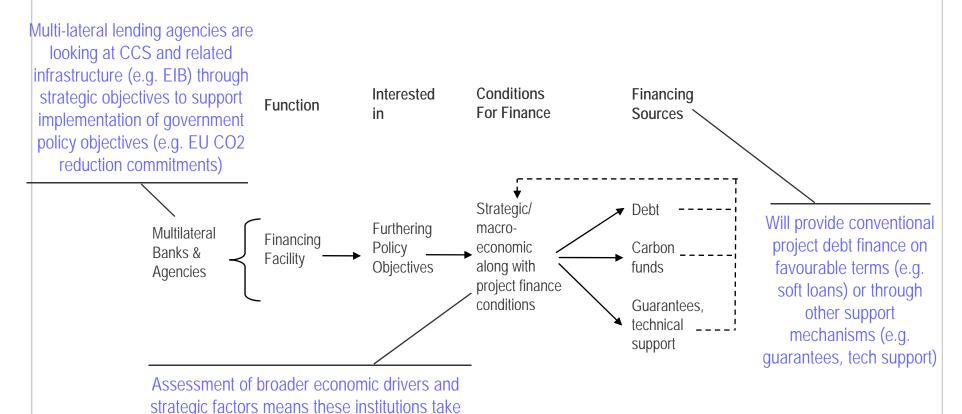
Altering funding approaches can change cost of service and reduce risk for early mover (e.g. govt funding reduces cost of service to \$8.2 for just Tranche 1 with the Option 2 (i.e. only 4 plants connected to the backbone)

Investor perspectives – private banks



Pure project finance may be applicable as market and technology evolves. Risk may be reduced through equity interest from investors for credit offtake Delivering sustainable solutions in a more competitive world

Investor perspectives – multilateral lenders



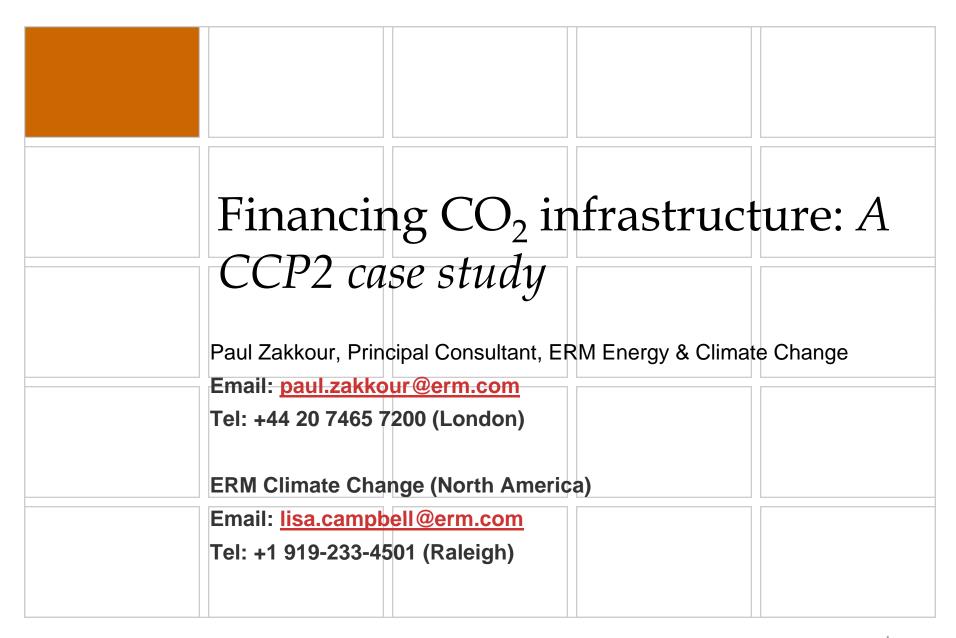
Ready to finance CCS demonstration plants and other experimental clean coal technologies (primarily as RDI projects) provided they meet environmental, economic, technical and financial criteria, including credit risk criteria.

a different perspective to project appraisal.

Key messages

- Integrated backbone pipeline networks may be most efficient longterm option.
 - Will need "guaranteed" capacity utilisation in order to be economically viable.
 - Point-to-point pipelines will be funded on project-by-project basis by individual developers because of certainty over capacity utilisation.
- Public policy that encourages development of optimised networks will be needed.
 - Government incentives, loan guarantees will support with commercial appraisal of backbone infrastructure
 - Government support in first years when capacity is ramping up will be important to commercial viability
- CO2 pipeline projects, if they can be reduced in terms of carbon price risks, will become the same in terms of risks as any other oil & gas pipeline project
- Banks and financial institutions view such projects as having significant regulatory and market (carbon price) risks.









Carbon Capture & Storage: Legal and Regulatory Issues

IEA Clean Coal Centre/IEA GHG R&D Programme
Expert Meeting on Financing CCS
New York, NY
28-29 May 2008

Tom Kerr Energy Technology Office

© **OECD/IEA 2008**



Legal & Regulatory Issues

- Property rights for transport and storage
- Environmental permitting, risk management
 - Onshore and offshore
- Pipeline access, health & safety regulations
- Long-term liability frameworks
- Jurisdictional issues
- Need to develop regulatory models for early projects and adapt as knowledge is gained

All of these issues impact financing/cost



Current Developments

- EU "Enabling" Framework
 - Member States determine whether and where CCS will happen
 - Companies decide whether to use CCS on the basis of conditions in the carbon market
 - **♦** Permitting for CO₂ storage
 - ■Monitoring and reporting guidelines under EU-ETS in order to quantify any leaked emissions (proposal expected end 2008)
 - ◆ETS auctioning revenues major potential source of funding for CCS demonstration
 - ◆Transfer of responsibility to the state under clear conditions to avoid distortion of competition



Current Developments Cont'd.

- USA
 - Jurisdictional issues:
 - ■Capture US EPA's Clean Air Act
 - Transport US Department of Transportation
 - ■Storage US EPA's Safe Drinking Water Act
 - State/federal split of responsibility
 - Proposed rule for CO₂ published by summer 2008, final 2010
 - Legislation likely needed
 - ■Treatment under the Clean Air Act
 - Accounting for Injection and Any Leakage
 - Long-term Liability



Current Developments Cont'd.

Australia

- Will build from Offshore Petroleum Act platform
- Acreage release, property access
 - Oil & gas and CO₂ storage activities will overlap
- Legislation will provide the regulator with broad powers to direct the project to take mitigation and remedial actions

Canada

- Lack of financing for demonstration projects
- New federal GHG regs will require CCS at new oil sands and coal-fired electricity plants by 2018
- Liability for storage sites
 - Need to clarify, likely provincial (GHG fed'l)
- Need to establish M&V standards



Current Developments Cont'd.

- Japan Adopted legislation implementing London Protocol amendment
 - ◆Min. of Environment will issue permits
 - **■**Site selection report
 - **■**Environmental impact assessment report
 - Explanation for no appropriate disposal is available other than sub-seabed storage
 - Financial capability of the applicant
 - ■Technical capability of the applicant
 - **■**Project lifetime document
 - **♦**CO2 purity requirement : ≥99%



Current Developments Cont'd.

- London Protocol/OSPAR 2007 Amendments on CCS:
 CO₂ now may be dumped at sea, but:
 - Disposal must be into a sub-seabed geological formation
 - ◆ Disposed matter must be "overwhelmingly" CO₂
 - No wastes or other matter may be added
 - Disposal must be permitted by national authority
- UNFCCC including CCS in the CDM
 - May 2006 Workshop highlighted following issues
 - Project boundary concerns
 - Accounting for leakage resulting from the additional energy required
 - Ensuring the permanence of stored CO2
 - Series of workshops/consultations; next submissions 6/08
 - Path forward: a simplified CCS project method



IEA Secretariat CCS Work

- High-level recommendations for G8
- Legal & regulatory frameworks
 - ◆ Legal Aspects of CO₂ Storage publications
 - ◆13-14 May 2008: International CCS Regulators' Network launched
 - Future web conferences on specific topics
 - ♦ 10 July: CO2 transportation health & safety issues
 - Global updates on regulatory/legal developments
 - Outreach to developing regions
 - Annual meeting
 - October 2008: new CCS publication
 - CCS/GHG market mechanisms analysis
 - ♦ March 2009: high-level CCS Summit



Thank You

tom.kerr@iea.org

www.iea.org/Textbase/subjectqueries/cdcs.asp



Abu Dhabi and California Projects; the Commercial Aspects of Making it Work and What is Needed from Governments

Preston Chiaro Chairman, World Coal Institute

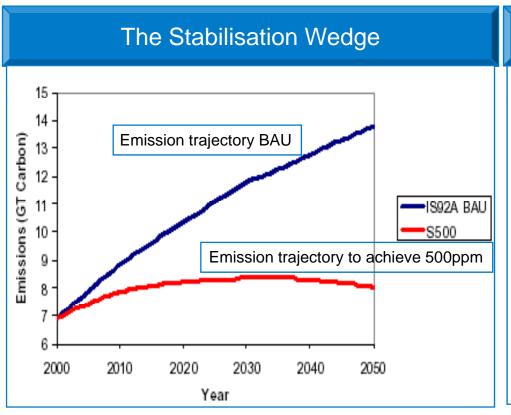
29 May 2008

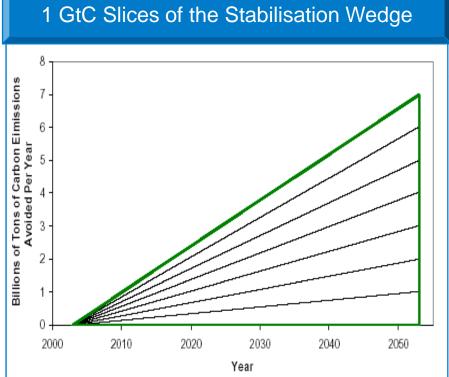
WE NEED TO DEPLOY CCS TECHNOLOGY

CUMULATIVE GLOBALLY SEQUES TERED CO2

CUMULATIVE GLOBAL NEED TO SEQUESTER CO₂

PRINCETON WEDGES: TECHNOLOGY OPTIONS FOR GHG STABILIZATION

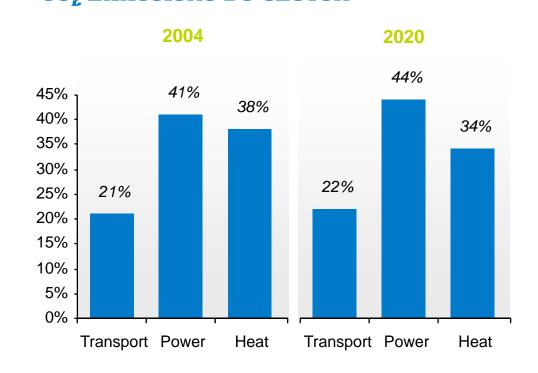




HOW BIG IS A WEDGE?

| Examples of Lower Carbon Slices | Scale for 1GtC Reduction by 2050 |
|--|--|
| Increased energy efficiency across the economy | 2 billion gasoline/diesel cars achieving 60 mpg |
| Fuel switching natural gas displacing coal for power | 1400GW fuelled by natural gas instead of coal |
| Solar PV or Wind replaces coal for power | 1000x scale up PV, 70x scale up for wind |
| Biofuels to replace petroleum based fuels | 200x10 ⁶ ha growing area (equals US agricultural land) |
| Carbon Capture and Geological Storage | CO ₂ captured from 700 1GW coal plants; storage = 3,500x In Salah/Sleipner or CCS applied to 5% of new power growth |
| Carbon Free Hydrogen for transport | 1 billion H ₂ carbon free cars; H ₂ from fossil fuels with CO ₂ capture and storage or from renewables or nuclear |
| Nuclear displaces coal for power | 700 1GW plants (2x current) |
| Bio-sequestration in forests and soil | Increased planted area and/or reduce deforestation |

THE ENERGY SECTOR EMISSIONS CHALLENGE CUZ EMISSIONS BY SECTOR



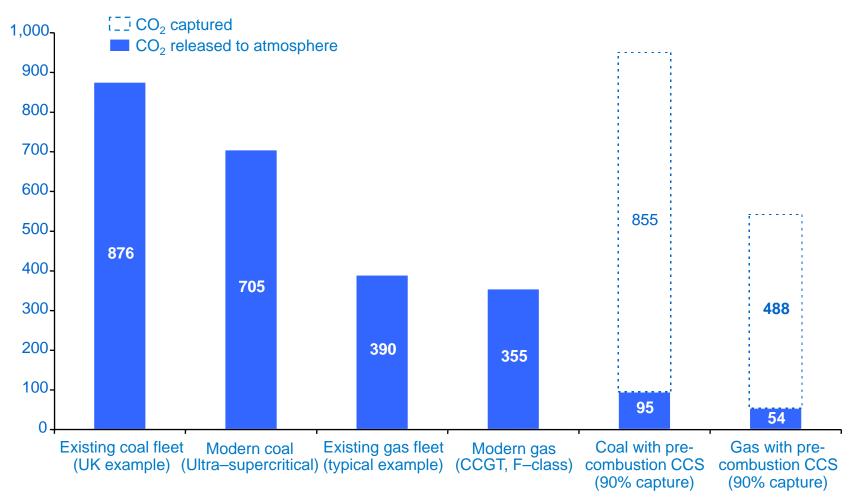
- THE POWER SECTOR
 IS ALREADY THE
 LARGEST
 CONTRIBUTOR OF CO2
- GROWTH IN COAL-FIRED GENERATION IS PROJECTED TO BE THE SINGLE LARGEST CONTRIBUTOR OF NEW GHG EMISSIONS OVER THE NEXT FIFTEEN HEARS
- CCS IS A KEY SOLUTION FOR THIS INDUSTRY

Source: IEA World Energy Outlook, 2004

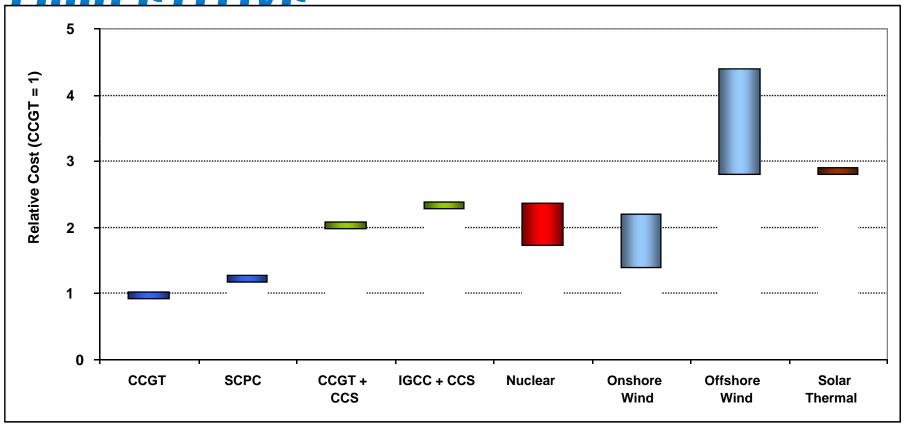
COMPARISON OF CO₂ EMISSIONS

CO₂ emissions from fossil–fuel power generation

g / kWh net electricity generation



THE COST OF ELECTRICITY WITH CCS IS COMPETITIVE



WE ARE ENTERING A VITAL PERIOD IF CCS IS TO TAKE OFF...



SO WHAT ARE WE





A COMPANY JOINTLY OWNED BY BP AND RIO TINTO

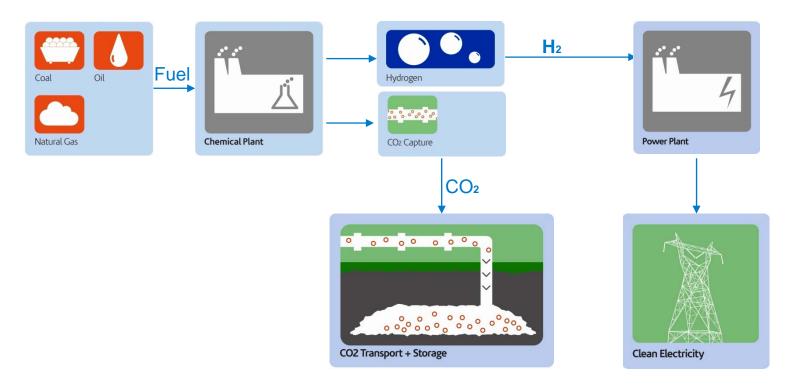
 ESTABLISHED TO SUPPLY LOW CARBON HYDROGEN FUEL TO THE POWER SECTOR

 USING FOSSIL FUELS AND CARBON CAPTURE AND STORAGE





HYDROGEN ENERGY - WHAT DOES IT DO?









HYDROGEN POWER ABU DHABI PROJECT

- RELOCATING AND LEVERAGING PETERHEAD LEARNINGS

- GEOGRAPHY MIDDLE EAST
- FUEL NATURAL GAS
- SIZE 500 MW POWER PRODUCTION Dhabi
- TECHNOLOGY GAS REFORMING/COMBINED CYCLE TURBINES
- SEQUESTRATION OIL FIELD WITH EOR BENEFIT
- HE FOCUSED ON POWER AND CO2 SALES



PROJECT SCOPE hydrogen **energy Hydrogenation &** Pre-Reforming Desulphurisation Air (pre-heated in HRSG) **Auto-Thermal** Reforming **Amine Absorber** Hydrogen **Shift Reactors NG Pre-treatment** Steam CO₂ HP NG Feed Regen Compressio n Sulphur CO₂ Removal **Natural Gas Proces** Syngas Production Removal Cond Fuel (H2 + Nitrogen) **DESALINATION HRSG** Air **PLANT** Steam Water for in-Combusto GT BF **Turbine** ST house plant use W Generator Gas **Turbine** Generator **Vacuum Power Production** condensate



HYDROGEN ENERGY CALIFOR. hydrogen energy



- ADJACENT TO OCCIDENTAL ELK

 ADD CO2 INJECTION POINT AND

 REVENUE
- AREA PROVIDES PROXIMITY TO FEEDSTOCKS

 AND INTRASTATE TRANSMISSION
- LOW POPULATION DENSITY
- UTILIZE LOCAL AREA PETCOKE RAILED COAL FOR FEEDSTOCK



HYDROGEN ENERGY CALIFOR..... PROJECT: The second of the se

SIZE & 400MW POWER PRODUCTION

GEOGRAPHY - US WEST COAST

FUEL - PET COKE/BITUMINOUS COAL

TECHNOLOGY - COAL GASIFICATION

TOTHESPERURE - 4 MILLION

ESECUESTRATION OIL FIELD WITH

SALE INTEREST IS FOCUSED ON H2

STRONG POLITICAL ENVIRONMENT

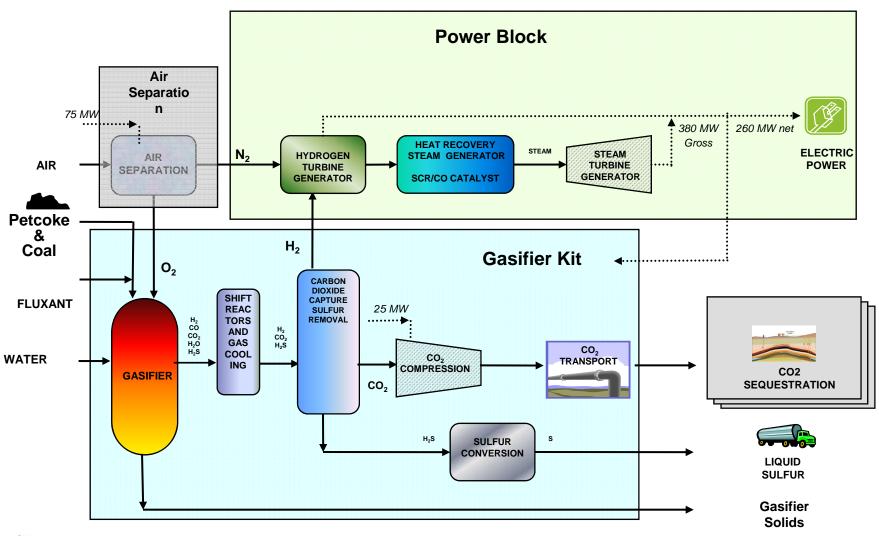




HE California







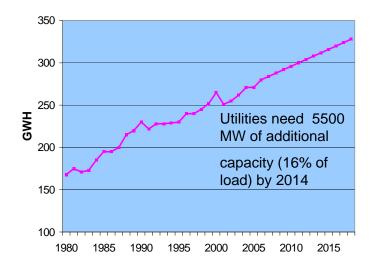




Political support



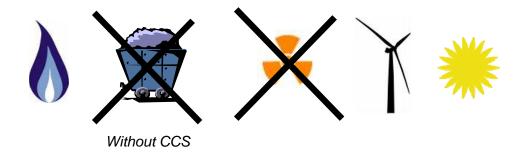
Power demand



California environmental policies

- California Energy Action Plan I and II
- AB 32: Global Warming Solutions Act
- SB 1368: GHG Emissions Performance Standard
- California Loading Order
- California Policies Supportive of Carbon Capture and Storage
- AB 1925: Carbon Capture and Sequestration Legislation

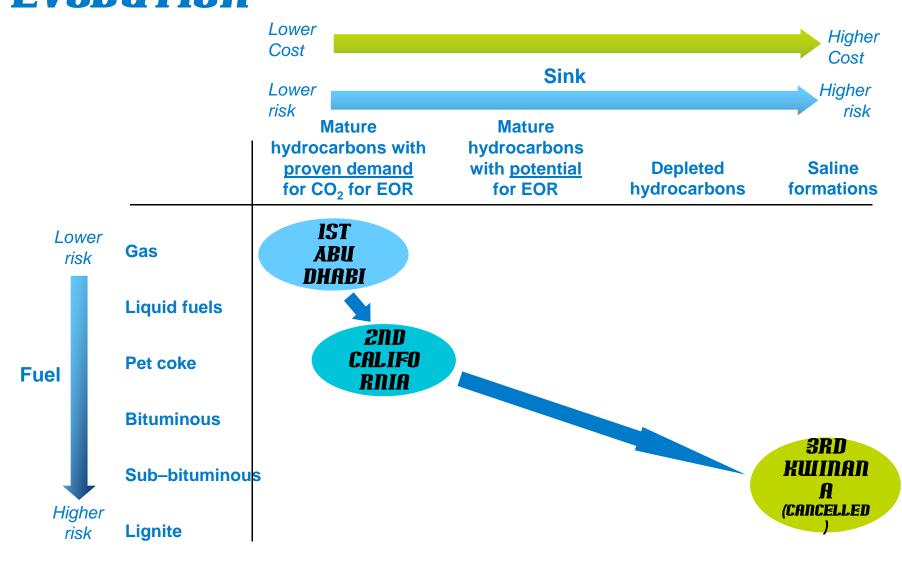
Limited options in California







HYDROGED ENERGY PROJECT EVOLUTION









HOWEVER POWER PROJECTS WITH CCS NEED SUPPORT TO DEVELOP

Comparable costs for electricity

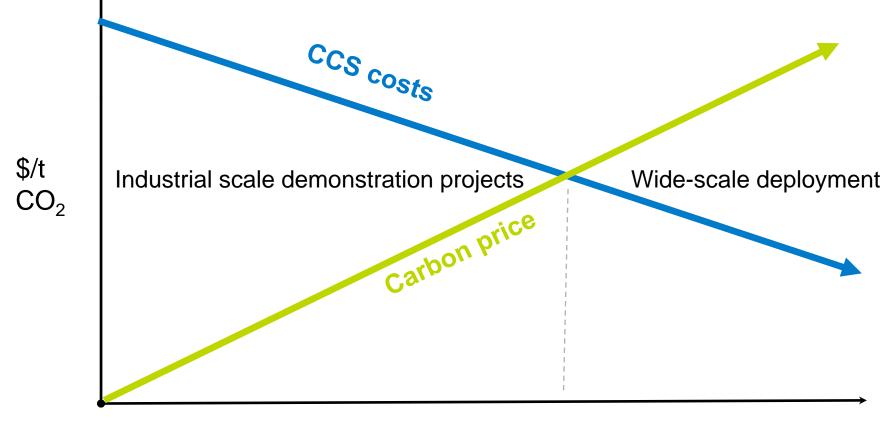
fossil fuels without carbon capture and storage hydrogen energy and CCS, nuclear renewables

- Support already provided to renewables
- Over time, experience gained from building and operating the first plants of this type, and technology advances will help to bring the cost of hydrogen energy and CCS (and renewables) down





EVENTUALLY CARBON PRICE WILL SURPORT CCS



Time

Carbon price supports CCS

OTHERS' VIEWS ON COSTS

INTERNATIONAL ENERGY AGENCY

- US\$16 TRILLION WILL BE NEEDED TO MEET GLOBAL ENERGY DEMAND NEXT 30 YEARS
- US\$1.9 TRILLION OF THAT FOR COAL-FIRED POWER GENERATION

PRINCETON UNIVERSITY (SOKOLOW) / COLUMBIA UNIVERSITY (SACHS, LACKNER)

CARBON EMISSION CHARGES OF ABOUT US\$100/TC (I.E. ABOUT US\$30/TCO₂₎ WOULD ENABLE
 COMMERCIALISATION OF CCS AND ALL OTHER
 NECESSARY TECHNOLOGIES

SHELL / RWE

 EARLY PROJECTS LIKELY TO REQUIRE A LEVEL OF SUPPORT EQUIVALENT TO \$100 - 150 / TONNE CO

IN THE NEAR TERM — A RANGE OF SUPPORT MECHANISMS ARE AVAILABLE

| TYPE OF MECHANISM | EXAMPLES |
|--|---|
| MANDATED REQUIREMENTS FOR NEW PLANT TO BE LOW CARBON | EU SUGGESTION THAT ALL NEW PLANT BE LOW CARBON FROM 2020 (EU ETS WOULD COVER EMISSIONS FROM EXISTING AS WELL AS NEW PLANT) PORTFOLIO STANDARDS IN US |
| CARBON PRICING | TRADABLE ALLOWANCES TAXES HYBRIDS OF TAXES AND TRADABLE ALLOWANCES POTENTIALLY SUPPORTED BY OTHER FINANCIAL INSTRUMENTS |
| INDUSTRIAL POLICY SUPPORT | CAPITAL GRANTS TAX BREAKS GOVERNMENT OR PUBLIC UTILITY EQUITY |
| SUPPORT FOR NEW TECHNOLOGIES, ESPECIALLY RENEWABLES | RESERVED MARKET (MAY BE IMPLEMENTED WITH TRADABLE CERTIFICATES) PREMIUM PRICE SET BY REGULATOR (E.G. FEED-IN TARIFFS) PREMIUM PRICE SET BY AUCTION, TENDER OR NEGOTIATION |

Sources: Deloitte and Touche LLP

THE SUPPORT MECHANISMS CAN BE FUNDED IN DIFFERENT WAYS

Customers

- electricity prices are higher due to the carbon price
- additional costs from quantity obligations (e.g. Renewable Portfolio Standards or Green Certificate Schemes)
- the cost of premium priced contracts (e.g. feed in tariffs) passed through
- separate tax or levy on the retail price or wires business charges

Tax payers

- general or earmarked taxation may fund support as grants, premium price payments or tax breaks (capital or per MWh support)
- government or publicly owned utilities may provide cheap capital (debt or equity)

Shareholders

 surplus created by free allocation of allowances can be appropriated by means of auctions, windfall taxes or price floor arrangements and channelled to clean generation

Sources: Deloitte and Touche LLP

POINTERS TO WIDESPREAD POLICY **SUPPORT**

only Projects work in exceptional circumstances

US joins international climate change efforts

EU-wide or **US** federal policy support

Catastrophi c events resulting from global warming

> Individual government s support individual projects

'Son of Kyoto' replacement treaty 2012-2015

Projects are feasible across the developed world

Successful early projects up and running

SUMMARY

- CONTRIBUTION TO TACKLING CLIMATE CHANGE FROM CCS CAN BE CONSIDERABLE
- EARLY INDUSTRIAL SCALE COMMERCIAL PROJECTS READY TO BE DEVELOPED
- GOVERNMENT AND POLICY INCENTIVES NEEDED TO ENABLE CONSTRUCTION AND OPERATION OF THESE EARLY PLANTS
- LONG TERM INSTRUMENTS SUCH AS A HIGHER CARBON PRICE SHOULD EVENTUALLY BE SUFFICIENT TO SUPPORT UNIDESPREAD DEPLOYMENT OF CCS



Challenges for Early Movers

The ZeroGen Experience

Presentation to the

Expert Meeting on Financing Carbon Capture and Storage

by Dr Anthony Tarr, Chief Executive Officer, ZeroGen Pty Ltd



Challenges for Early Movers



- Global and national setting
- Project overview
- Project deployment challenges
- Some important `open` issues

ZeroGen - global and national setting



- Ratified Kyoto Protocol 2010 emission trading scheme
- Climate change public policy and business decision makers
- State energy policies new coal-fired power stations w/o CCS
- Funding Federal, State and industry funding commitments
- Australian coal industry
- Integrated Gasification Combined Cycle (IGCC) + Carbon Capture and Storage (CCS), in the future energy mix

Project Overview



- Location: Queensland, Australia
- Current structure: owned by Queensland Government
- Technology approach: IGCC + CCS

Timeline: Stage I - 2012, Stage II -2017

Substantial industry support: ACALET, ACA, Shell



Project Overview – Project Participants















resources & energy













URS



Project Overview



2008

- Initial feasibility 6FA
- Financial planning
- Initial funding from ACALET & ACA
- Approval for 9FA
- Conceptual JV term sheet
- Agreement with Shell
- Discussions with GE, Honeywell and others

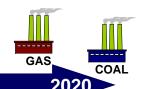
2012 - Stage I

- 6FA 82MWh
- Construction competed
- Operation for 5 years
- Location already determined
- Partial funding in place
- 75% CO₂ capture

2017 - Stage II

- 9F 279MWh
- 90% CO₂ capture
- Location TBD
- Funding structure TBD





2008

2012

2017

2009

- Stage I feasibility study
- Composition of investors mix
- Funding programme initiation
- Stage II feasibility study (2012)

2020 - Stage III

Future competitive landscape

- Fuel costs
- CO₂ costs
- Technology costs



- ZeroGen IGCC + CCS identified by Australian coal industry as priority technologies for development
- Challenges for deployment exist in relation to:





Political, Legal and Regulatory

- Permits and regulatory framework
- Consensus and joint undertakings
- Approvals issued for IGCC / CCS
- Fragmented global CO₂ policy
- Globally relevant regulations

Technology

Community

Stakeholder

Financial, Commercial & Economic



Technology

- IGCC technology
- CCS
- Geosequestration
 - Exploration
 - Injection
 - Well design

Location and technology integration

- Site selection
- Construction
- O&M

Political, Legal & Regulatory

Community

8

Stakeholder

Financial, Commercial & Economic



Political, Legal & Regulatory

Technology

Financial, Commercial & Economic

Community & Stakeholders

- Investment and public community confidence in CCS
- Over 200 interest and stakeholder groups
- Current support from
 - Government
 - Public
 - Industry
 - Commercial
 - Union



Political, Legal & Regulatory

Technology

Community &

Stakeholde

Financial, Commercial & Economic

<u>Financial:</u> Revenue and profitability dependent on:

carbon pricing

government subsidies

technology efficiency improvements

(CapEx, OpEx)

Financial risk: Technical, Financial (loan & interest,

bankability)

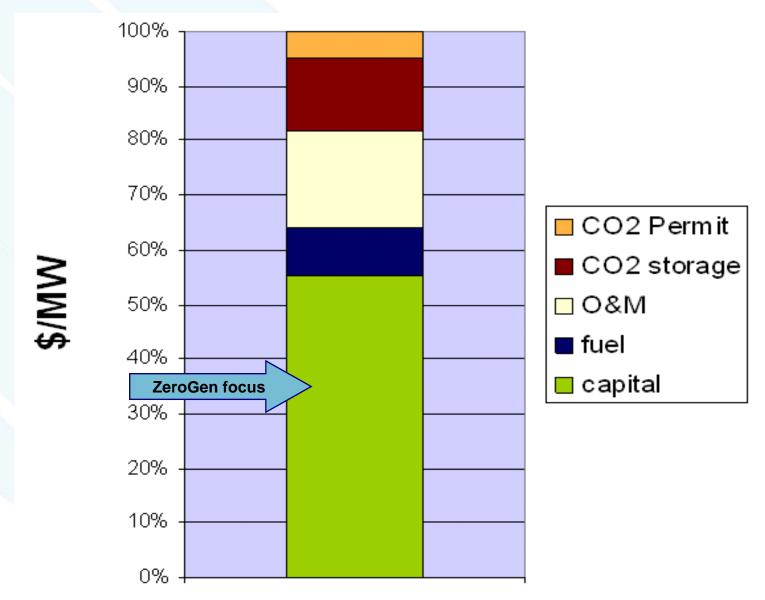
Commercial: Identifying L-T investor

Economic: Input optimisation of Australian economy

and coal industry



IGCC with CCS cost breakdown



Some important 'open' issues



Investment structuring - funding options and schemes

- Grants enhanced ETS credits
- Industry participants
- Loan guarantees
- Private parties
- ETS for direct investment
- Clean Development Mechanism (CDM) credits

- Funding options
 will be discussed
 with Government
 funds, and
 commercial banks
- Need for innovative ideas to address bankability of demonstration projects



Thank you



Climate Change and Carbon Capture and Storage (CCS) Technology







Mountaineer Plant - New Haven, WV

Northeastern Plant - Oologah, OK

Bruce Braine
Vice President - Strategic Policy Analysis
Expert Workshop on Financing CCS
May 29, 2008

Company Overview



Coal/Lignite 67%



Nat. Gas/Oil 24%



Nuclear 6%



Pumped Storage/ Hydro/Wind 3%

Industry

AEP's Generation Fleet 38,388 MW Capacity



5.1 million customers in 11 states Industry-leading size and scale of assets:

| | | <u>inaastiy</u> |
|---------------------|---------------------|-----------------|
| <u>Asset</u> | <u>Size</u> | <u>Rank</u> |
| Domestic Generation | ~ 38,300 MW | # 2 |
| Transmission | $\sim 39,000$ miles | # 1 |
| Distribution | ~ 208,000 miles | # 1 |



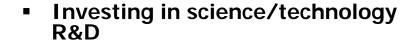
AEP's Climate Strategy















- Taking Voluntary action now, making real reductions thru CCX (2003-07: 40 MM Tons reductions); 2011 Voluntary Commitment (additional 5 MM Tons/year reductions).
- Investing in long term technology (e.g., IGCC, Ultrasupercritical PC and CCS)





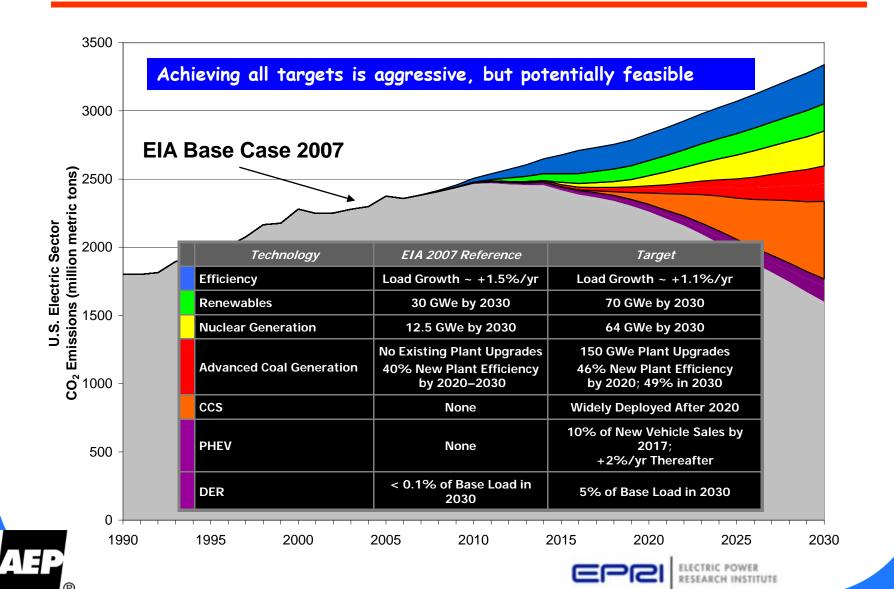
AEP's Climate Position

- A certain and consistent national policy for reasonable carbon controls should include the following principles:
 - Comprehensiveness
 - Cost-effectiveness
 - Realistic emission control objectives
 - Monitoring, verification and adjustment mechanisms
 - Technology development & deployment
- Inclusion of adjustment provision if largest emitters in developing world do not take action



A reliable & reasonably-priced electric supply is necessary to support the economic well-being of the areas we serve.

EPRI CO₂ Reduction "Prism"



AEP's Long-Term GHG Reduction Portfolio

Renewables (Biomass Co-firing, Wind)

Supply and Demand Side Efficiency



Off-System Reductions and Market Credits (forestry, methane, etc.)

Commercial Solutions of New Generation and Carbon Capture & Storage Technology



AEP is investing in a portfolio of GHG reduction alternatives

AEP Leadership in New Technology: IGCC and USC

NEW ADVANCED GENERATION

• **IGCC** -- AEP first to announce plans to build two 600+ MW IGCC commercial size facilities in US (OH and WV) by mid next decade



• **USC** -- AEP will be first to employ new generation ultra-supercritical (steam temperatures >1100°F) coal plant in U.S (AR)





CO₂ Capture Techniques

Post-Combustion Capture - Conventional or Advanced Amines, Chilled Ammonia

- Relatively low CO₂ concentration in flue gas Thus difficult to capture
- Amine technologies commercially available in other industrial applications
- High parasitic demand
 - Conventional Amine ~30-35%, Chilled Ammonia target ~10-15%
- Amines require <u>very</u> clean flue gas, Chilled Ammonia less sensitive to contaminants

Modified-Combustion Capture - Oxy-Coal

- Technology not yet proven at commercial scale
- Creates stream of very high CO₂ concentration
- High parasitic demand, >25%

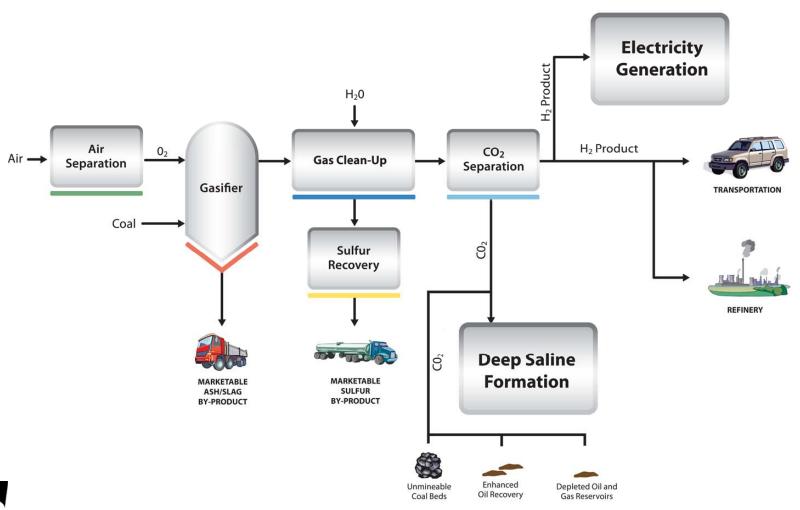
Pre-Combustion Capture - IGCC with Water-Gas Shift

- Most of the processes commercially available in other industrial applications
 - Have never been integrated together
- Turbine modified for H₂-based fuel, which has not yet been proven at commercial scale
- Creates stream of very high CO₂ concentration
- Parasitic demand (~15-20%) for CO₂ capture lower than amine or oxy-coal



IGCC Water-Gas Shift Process

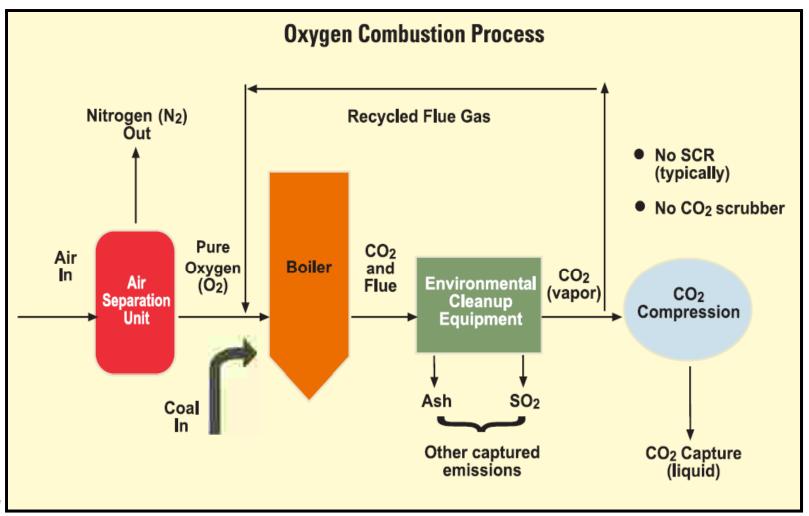
Pre-Combustion Capture





Babcock & Wilcox Oxy-Coal Process

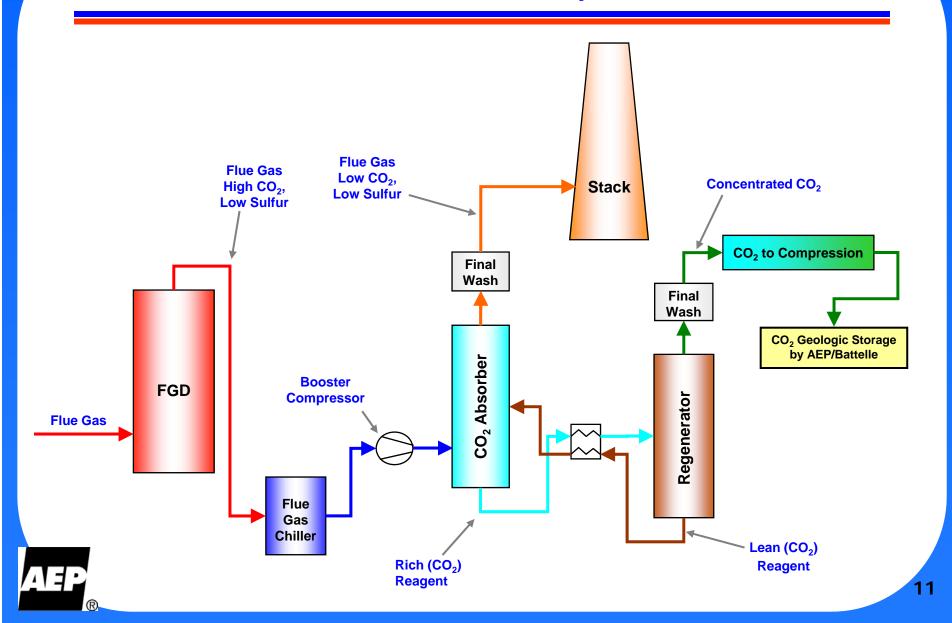
Modified Combustion Capture





Alstom's Chilled Ammonia Process

Post-Combustion Capture



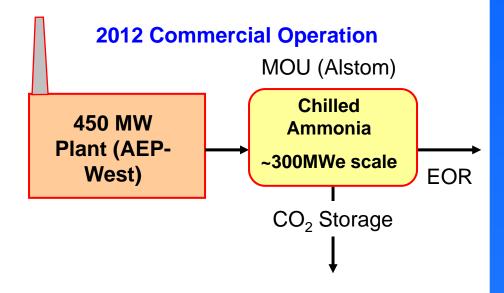
AEP Leadership in New Technology: Chilled Ammonia CCS

Phase 1

2009 Initial Operation MOU (Alstom) Chilled Ammonia 20MWe scale CO₂ Storage (Battelle)

Captures and Stores ~ 100,000 metric tons of CO₂ /yr.

Phase 2



Captures and Stores
1.5 Million metric tons of CO₂/yr.



The Challenge: CCS is Expensive

\$50+

\$/ton CO₂e

- Carbon Capture w/ Geologic Sequestration
- Other renewable, advanced geothermal and/or solar
- Carbon Capture for Enhanced Oil Recovery
- New Biomass Generation
- Dispatch of additional gas vs. inefficient coal
- Biomass Co-firing
- Biological Sequestration (e.g. Forestry)
- New Wind
- Energy Efficiency
- Methane Offsets

Nuclear?



CCS: The Business Case

- CO₂ Legislation Requiring Very Substantial Long Term Reductions is Likely
- A Portfolio of Reduction Options Will Be Needed
- Future Electricity Demand Requires New "Baseload" Power Options (Predominantly Coal and Nuclear)
- Half of Existing Demand is Met By Coal and Early Retirement of Coal is Expensive. Thus, Retrofit CCS becomes essential.



Key Issues for CCS Development

- Overcoming the "Economic" Hurdle—Bonus Allowances and Other Financial Support
- High Up-Front Capital Investment Getting Adequate Financing and Recovery in Rates
- Commercial Demonstrations of CCS at Large Coal-Fired Power Plants
- National Standards for Permitting of Storage Reservoirs
- Potential Institutional, Legal and Regulatory
 Barriers to Carbon Storage





Ongoing CO₂ Capital and Transport Costs

Gary Loop
Senior VP and Chief Operating Officer
Dakota Gasification Company

IEA GHG Financial Conference







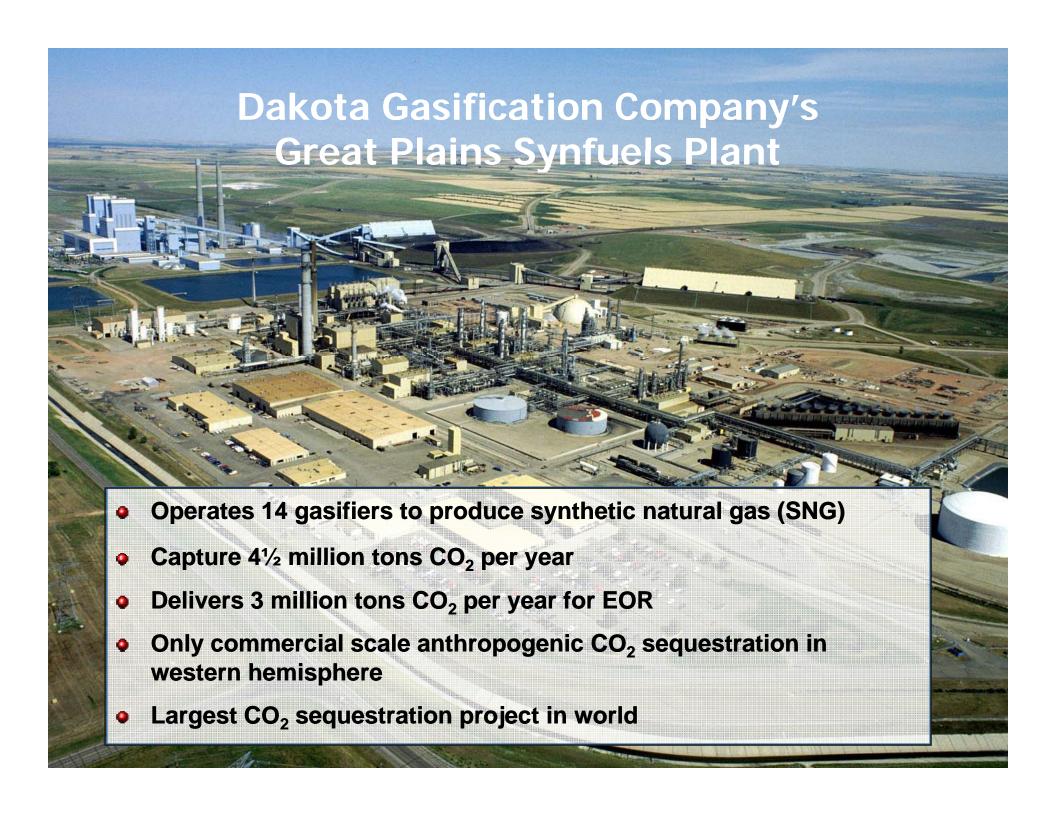




Overview

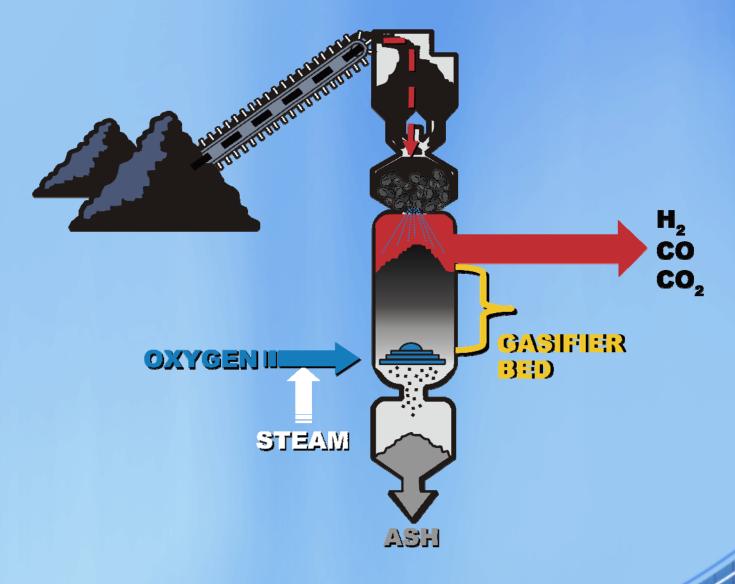
- Carbon capture in place today
 - Dakota Gasification Co. coal to gas facility
 - Largest carbon capture and storage project in the world
- Carbon capture technology cost comparisons
 - Pre-combustion (IGCC)
 - Post-combustion (SCPC)
- Demonstration of post-combustion technology
 - Unique opportunity in Williston Basin
- Financial incentives to consider
 - Tax credits
 - Investment tax credits







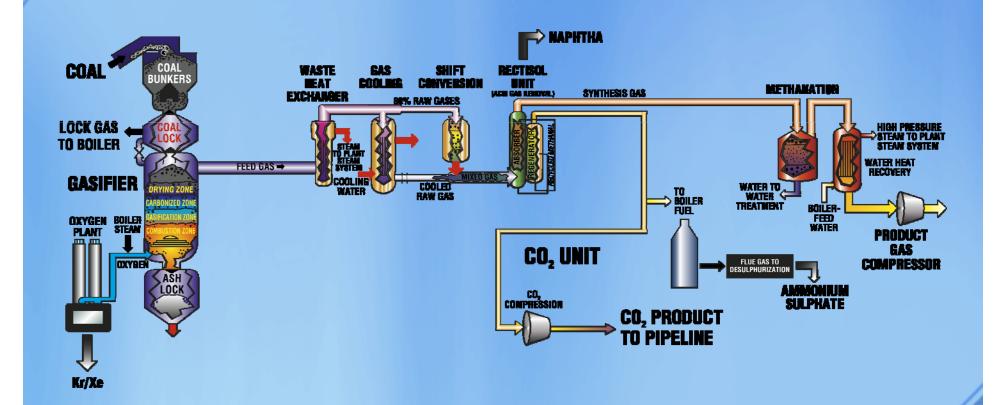
Gasification Process







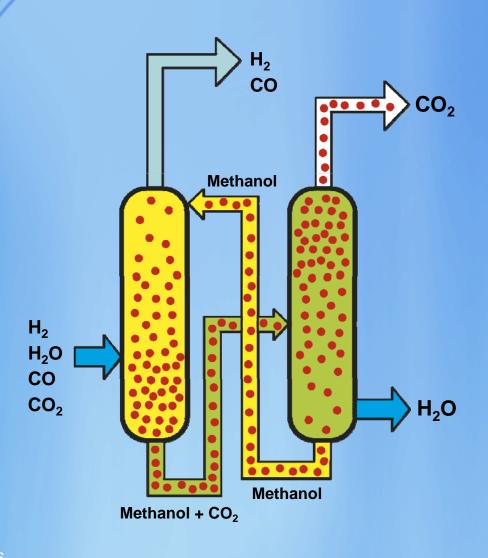
Coal Gasification







Capture CO₂ from Raw Gas Stream



- Low gas volume
- High % CO₂
- High pressure
- Capture 95+% of CO₂





Dakota Gasification Company

World's Largest Carbon Sequestration Project

Weyburn, Saskatchewan

13 million tons sequestered to date



5 million tons/yr. Pipeline capacity

CO₂ PIPELINE

Current flow rate: 3 million tons/yr.

Compressors



CO₂







Capture Technology

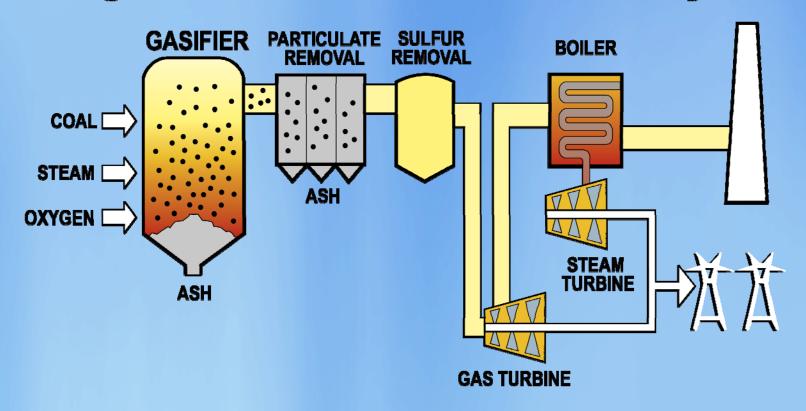
Rectisol capture costs

| | Capture |
|---------|------------|
| | \$/ton |
| Capital | \$4 |
| O&M | \$4 |
| TOTAL | \$8 |





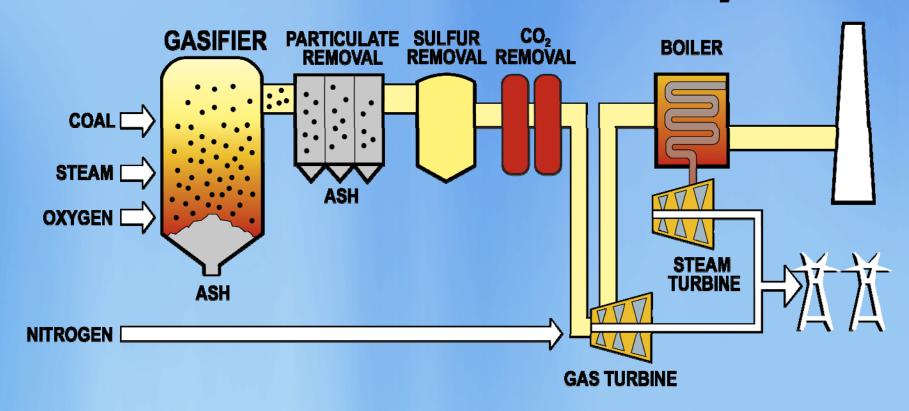
Integrated Gasification Combined Cycle







Integrated Gasification Combined Cycle with CO₂ Capture

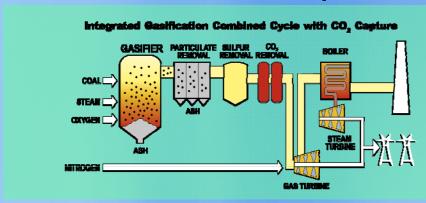




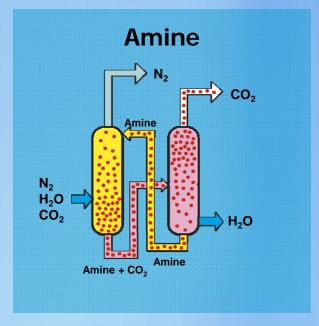


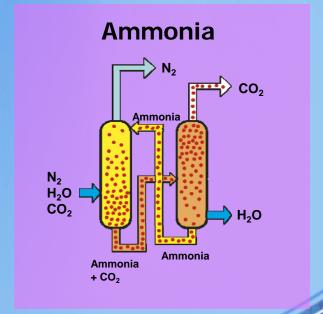
CO₂ Capture – Methodologies

Pre-combustion capture



Post-combustion capture

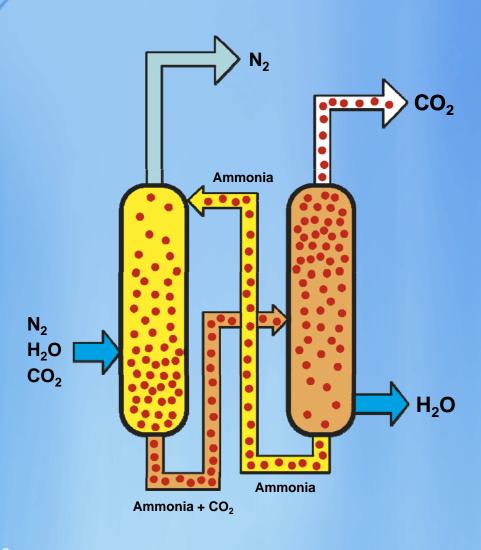








Capture CO₂ from Flue Gas

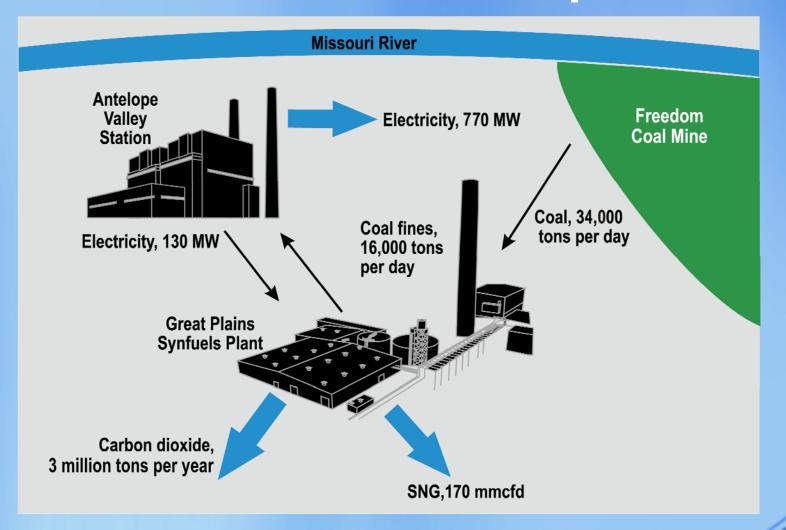


- High gas volume
- Low % CO₂
- Low Pressure
- Capture 90+% of CO₂





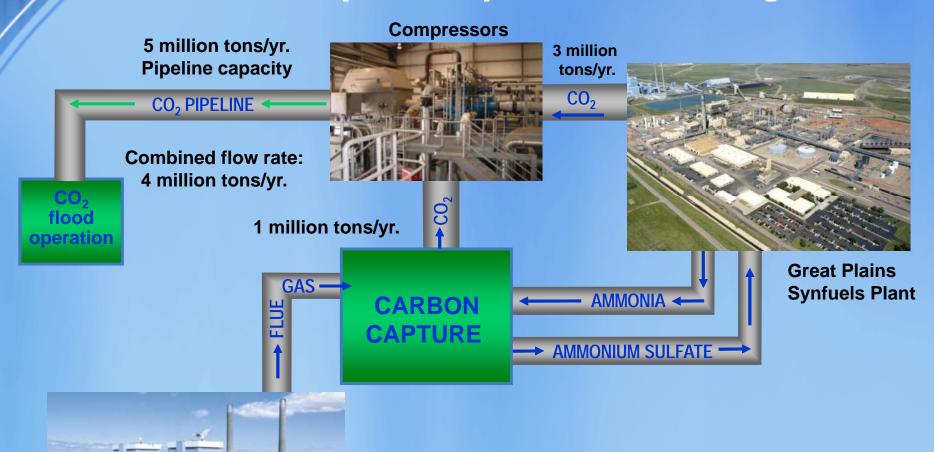
AVS-DGC Relationship







Carbon Capture Optimization Project



Antelope Valley Station (AVS)





Commercial Demonstration of Ammonia CO₂ Capture

- Flue gas stream for 120 MW
- 1 million tons CO₂ removed
- \$200 to \$300 million in capital
- \$25 to \$35 per ton CO₂



Antelope Valley Station (AVS)





Capture Technology

| \$/ton | Ammonia | | Amine | | |
|---------|---------|-----|-------|----|----------|
| | high | low | high | | Rectisol |
| Capital | \$13 | 19 | 15 | 24 | 4 |
| O&M | \$12 | 16 | 15 | 26 | 4 |
| TOTAL | \$25 | 35 | 30 | 50 | 8 |





Advantages to AVS Post Combustion Demonstration Plant

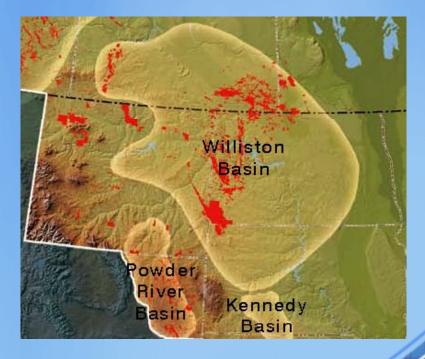
- DGC facility has established CO₂ transport technology within Williston Basin
- DGC facility produces ammonia required for CO₂ removal process
- DGC facility has ammonium sulfate production capacity to handle sulfur resulting from CO₂ removal





Williston Basin Offers Good Match

- All CO₂ currently produced can be stored in EOR sites for over 50 years
- CO₂ from burning all coal in basin can all be sequestered in Saline Aquifers within Williston Basin



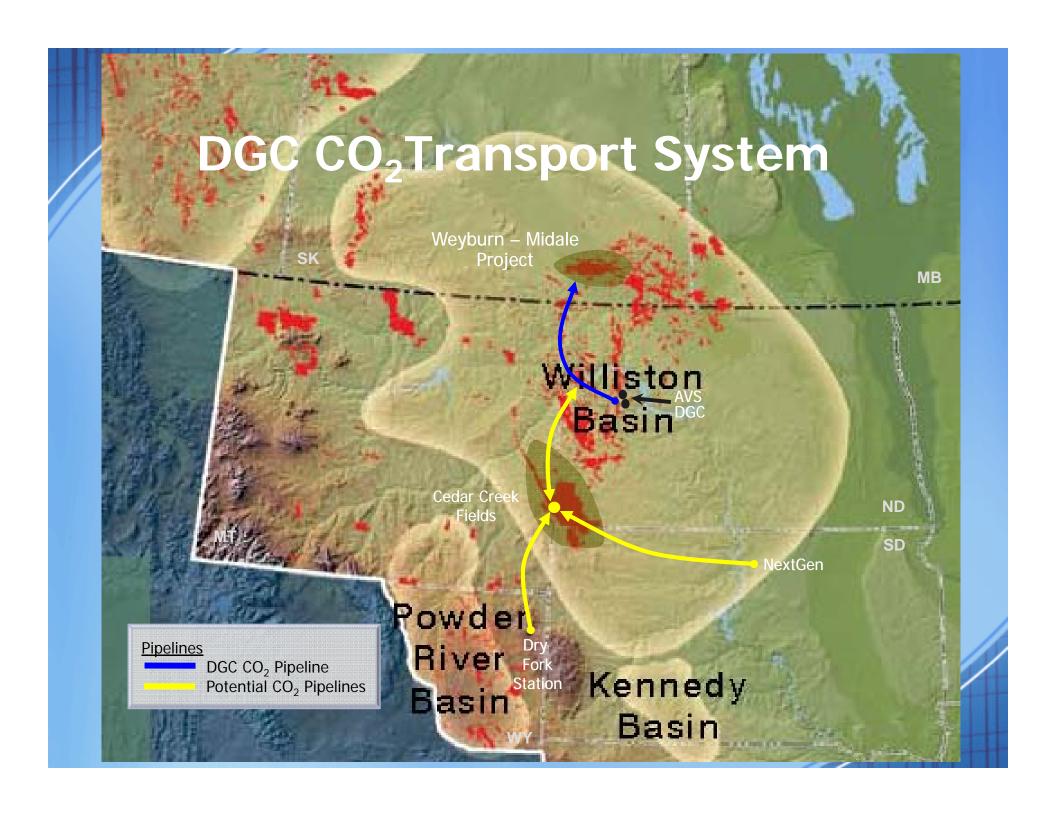




Timing is Right

- Oil prices are above historical levels and enhance the value of CO₂ as an EOR solvent
- Ammonia technology is ready for CO₂ capture demonstration
- Existing pipeline with excess capacity within basin that can be tapped for connection

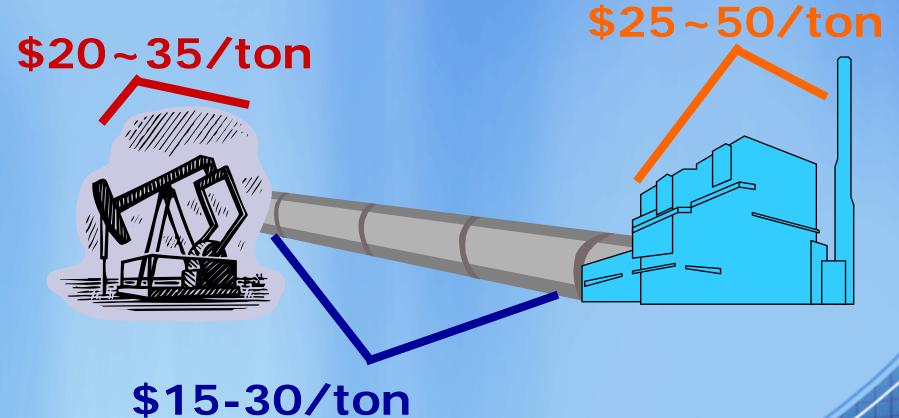






Estimated Costs

\$5~60/ton





Demonstration Plant Economics

| \$ 7tom |
|------------|
| |

(\$25)

| Capture Cost | (\$25) | (\$35) |
|-------------------------|---------------|---------------|
| Transport Cost | <u>(\$10)</u> | <u>(\$15)</u> |
| Cost of CO ₂ | (\$35) | (\$50) |
| Revenue | \$35 | \$25 |
| | | |

Net Gain (Loss)





Financial Incentives to Consider

- Tax credit of \$15/ton CO₂ can stimulate sites to prove evolving technologies
- 30% investment tax credit for demonstration plant can stimulate sites as well





Demonstration Plant Economics

\$10

(\$10)

| | \$/ton | | |
|-------------------------|--------|--------|--|
| Capture Cost | (\$25) | (\$35) | |
| Transport Cost | (\$10) | (\$15) | |
| Cost of CO ₂ | (\$35) | (\$50) | |
| Revenue | \$35 | \$25 | |
| Net Gain (Loss) | \$ 0 | (\$25) | |
| Incentive | \$15 | \$15 | |



Net Gain (loss)



Thank you





LIABILITY (RISK) MANAGEMENT: Ensuring Financial Responsibility for GS

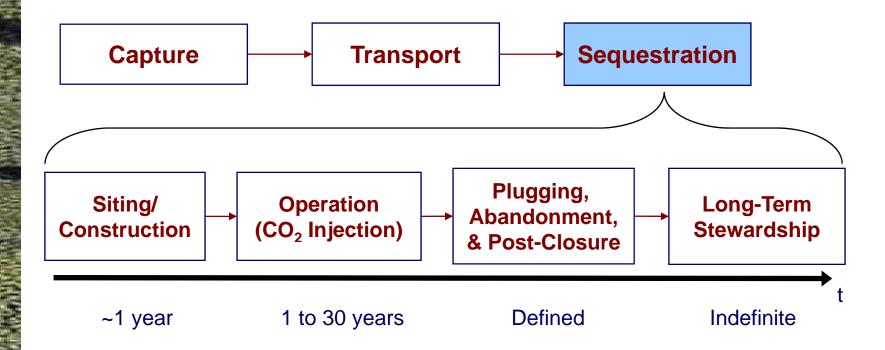
May 2008

Chiara Trabucchi Industrial Economics, Incorporated ctrabucchi@indecon.com | 617.354.0074



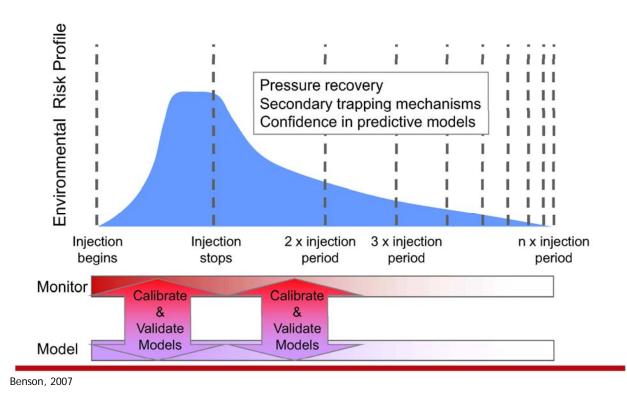
- RISK Of what?
 - Non-performance / default? Underperformance? Defect?
 Other contractual liability? Tort Liability for Bodily Injury (BI),
 (first party) Property Damage (PD), Ecological / Natural
 Resource Damage? Endangered Species Issues?
 - Moral Hazard Will the party be better off in the event of loss / failure? Is the party indifferent, and therefore won't try to prevent or mitigate certain losses?
- FINANCIAL RESPONSIBILITY To whom, for what? When?
- LIABILITY Statutory? Common law? Civil law jurisdiction?
- HARM / INJURY BI or PD or other?
- DAMAGES Nature? Type?
- INDEMNITY Contractual? Governmental? First dollar? Excess of retained amount? Insurance? Public / Private?

GS Project Life Cycle



- Industry Sectors Utility v. EOR/EGR
- Early movers (pilots) v. commercial-scale deployment
- Existing statutory implications SDWA, CAA, RCRA, CERCLA

Risk Profile for GS Sites



- Shape of the curve will vary by GS site
- Early movers (pilots) will site in favorable zones
- Liability frameworks must balance incentives that foster early deployment with the potential for adverse site selection (with increasingly risky profiles) due to moral hazard as commercial-scale deployment evolves.



(Uncertainty of Interplay with Existing Statutes)

- Numerous Potential Claimants, Causes of Action.
 - Nuisance, trespass, negligence, other torts
 - Statutory liability (SDWA, CAA, RCRA, CERCLA, ESA; local statutes; potential "cap" of Cap-and-Trade)
 - Contractual and "New" Potential Carbon Market
 Exposures required purchase of offsets, penalties / fines
- Spans State & Federal Authority
 - Jurisdiction, nature of the harm and attendant damages will interact to determine liability, compensability, and which (if any) party can transfer, release or assume liability.



Financial Responsibility (Certainty of a Sort...)

- An effective liability (risk management) framework will assure funds are available to pay for the necessary activity to:
 - Minimize potential for releases of the injectate from the containment zone over the long-term (post operational acts and confirmed stabilization); and
 - Detect problems before they adversely impact public welfare or the environment (MMV).
- The remaining challenge? Corrective (remedial) action, and to the extent necessary how damages will be redressed & up to what limit?

Liability (Risk) Management Options

| | | GS Project Phases | | |
|----|---|-----------------------------------|--|--|
| | Financial Responsibility Mechanisms | MMV (Injection / Operation) | Plugging, Abandonment & Post-Closure | Long-Term Stewardship (<u>after</u> prescribed post-closure) |
| 1. | Third-Party Instruments (Trust Funds, LOCs, Insurance, Bonds) | > | ~ | ~ |
| 2. | Self-Insurance (Financial Test, Corporate Guarantee) | ✓ | ✓ | × |
| 3. | Public/Private Hybrids Compensation Funds Risk Pooling Models | × | × | ✓ |

Notable Liability Frameworks:

Each Has Strengths and Weaknesses; Risk Profile is Key

<Public / Private Frameworks>

<Compensation (Trust) Funds>

1957 | Price-Anderson Nuclear Indemnity

1974 | SDWA UIC Program

1968 | NFIA Indemnity/Risk Pool 1980/1986 | CERCLA/SARA Superfund

2002 | SAFETY ACT Risk/Litigation Management

1990 | TAPAA/OPA OSLTF / TAPLF

2007 | IRGC / IOGCC State Compensation Funds



IEA Greenhouse Gas R&D Programme

Insurance and Liability

- What are the risks? What risks are insurable?
- What does the insurance industry need in order to formulate insurance products for CCS projects?
- What kind of policy environment is needed to develop these insurance products?
- What is government's role, if any, in insuring CCS projects?



Coal Technology Investment: Developments & Issues Concerning CCS in Australia

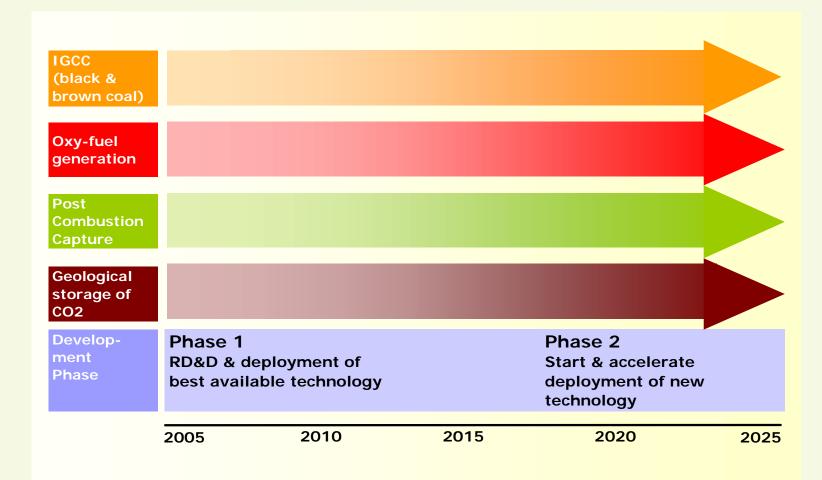
Ross Willims
Chair, ACA Low Emissions Technology Ltd

WCI/IEA Workshop: Financing Carbon Capture & Storage New York, 31 May 2008

COAL21 Objectives

- Australian National Action Plan for Low Emissions Coal Tech (LET)
- Inform, engage & align govts and industry
- Facilitate LET demonstration & uptake
- Promote supporting R&D
- Foster greater public awareness
- Promote international collaboration

COAL21 Action Plan



COAL21 Fund

- Voluntary levy on Aus coal production (> 95% buy in)
 - ➤ Initial 5yr / AU\$300 million increased to 10 yr / \$1 billion
- For coal LET demonstration projects & supporting R&D
- Managed by ACA Low Emissions Technology Ltd (ACALET)
 - > Board (coal co. executives)
 - > Tec Advisory Committee (expert advice bought in as needed)
 - > Technology Manager
 - Administered by Aus Coal Assoc
- Supported projects:
 - Oxy-fuel CS Energy Callide Oxyfuel Project
 - > IGCC ZeroGen
 - PCC CSIRO Post Combustion Capture Project
 - Storage Otway Project & Geological Reservoir Mapping

Australia

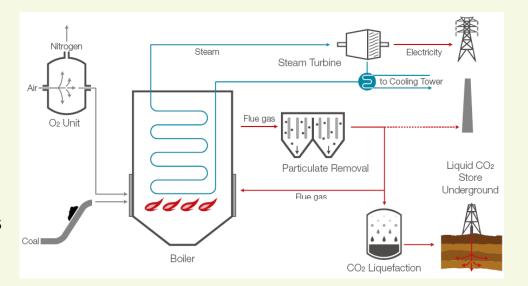
Australian COAL Association

CS Energy Oxy-fuel Project:

- Retrofit oxy-fuel & CO₂ capture to Callide A power station in Queensland
- Partners
 - ➤ CS Energy ➤ IHI
 - JPower > Xstrata
 - Schlumberger
- Funders:
 - COAL21 Fund AU\$68M
 - Aus Govt \$50M
 - CS Energy/Qld Govt/others- \$88M

Status:

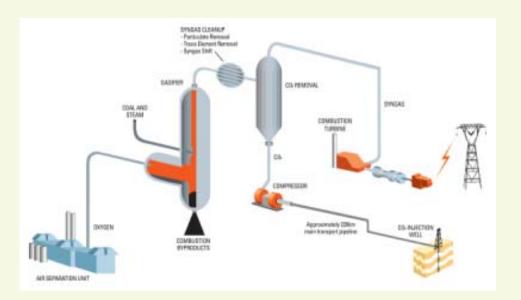
- Feasibility, pilot plant testing done
- Storage site investigations underway
- Plant construction to start late 2008
- Generation from 2010
- Geosequestration from 2011





ZeroGen Project

- Two stage approach to accelerate large-scale IGCC/CCS
- Stage 1 (by 2012)
 - > 80 MW IGCC demo plant
 - > CCS (~ 75% CO2)
 - GE 6FA gas turbine pathway to Stage 2
- Stage 2 (by 2017)
 - > 300 MW IGCC
 - > CCS (~ 90% CO2)
 - Next generation large scale high H₂ turbine
- Partners (so far):
 - ZeroGen (Qld Govt/Stanwell Corp)
 - Shell Development Aus
 - COAL21 Fund (AU\$300M)
- Next steps
 - Complete Stage 1 feasibility & fund build
 - Stage 2 Pre-feasibility





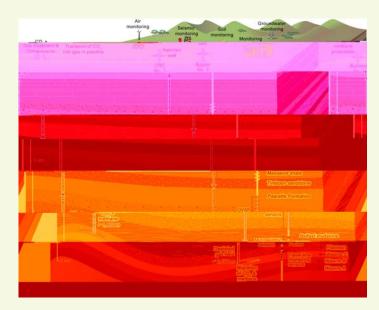
New South Wales Post Combustion Capture Project

- Partners (~ AU\$150M)
 - NSW Govt > Delta Electricity
 - ➤ CSIRO ➤ COAL21 Fund (\$50M)
- Pilot capture plant
 - Munmorah power station
 - Ammonia based absorption suited to Aus conditions
- Storage assessment/characterisation
 - Build on previous basin studies
 - Identify test well site by mid-2010
- Integrated PCC & storage demo
 - Install PCC on existing power station
 - Scalable to commercial size
 - ➤ Operational by 2014



Geological storage

- Otway Project (CO2CRC)
 - Stage 1 demo underway (injection into Victorian natural gas reservoir)
 - Stage 2 to target a saline aquifer (enhanced monitoring & verification)
- Regional storage assessments
 - Queensland & New South Wales
 - Assess storage potential
 - Develop storage capability
 - Understand & manage risks
 - ➤ Identify large scale/acceptable storage sites



Otway Project Schematic

www.co2crc.com.au

Vision of success – key elements

- Political framework & support
 - Qld & NSW Clean Coal Councils
 - National Low Emissions Coal Council
 - National Storage Taskforce (ACA, WWF, mining union, The Climate Institute)
- Effective collaboration
 - Genuine cooperation, not competition
 - All key players (govts, producers, generators, OEMs, researchers)
- Clear aspirations for commercial plant
 - Demos are crucial, but not the objective
 - Demos must be on pathways to commercialisation
- Financial incentives
 - Including emissions trading, but ET alone is not enough
 - Upfront support is essential to overcome market failure
- Supporting regulation
 - > Federal (offshore) CCS legislation has been drafted
 - > State (onshore) legislation under development

Threats to success – key challenges

- Plant costs
 - Worldwide equip/infra cost escalation
 - Widens the cost gap between conventional & new generation (demo & commercial) plant
- Long project lead times
 - Increasing urgency for meaningful GHG reductions
 - Early significant progress is important
 - Momentum must be sustained
- Stakeholder buy-in
 - Generators > Equipment suppliers
 - > NGOs > Public
- Public understanding/acceptance
 - Outreach & education is as important as the technology
- Lack of urgency globally
 - > Are we taking baby steps?





Take-aways



Australia is moving on all the key technologies for coal, but it's just the beginning of a decades long program.

A nation-building approach to carbon capture and storage is needed, based on public enthusiasm, political commitment and a shared vision of success.

Coal technologies must demonstrate significant early progress & sustained momentum if they are to stay relevant to the debate – we cannot risk being on the slow train.

Emissions limits and trading are necessary, but not sufficient - supplementary targeted CCS programs are essential.

building a CCS industry

29/5/08

new energy finance





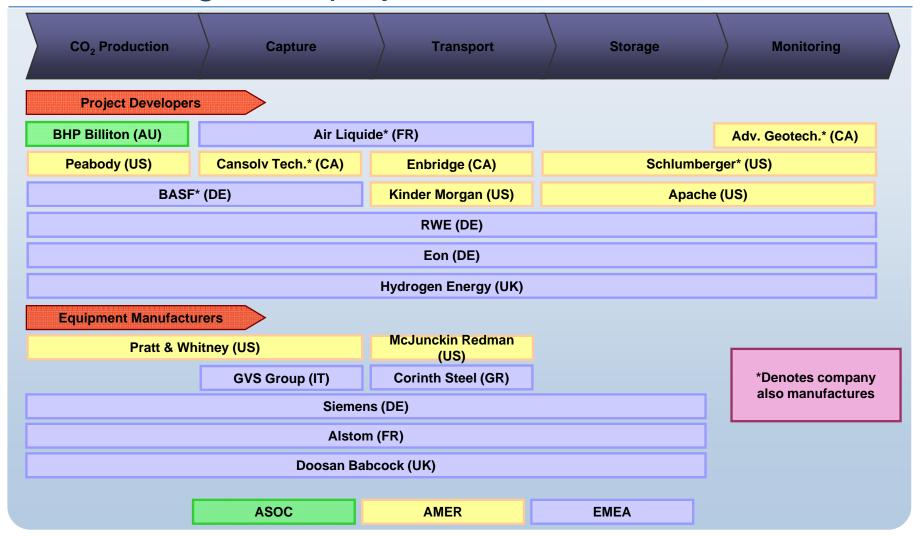




Mark A. Taylor



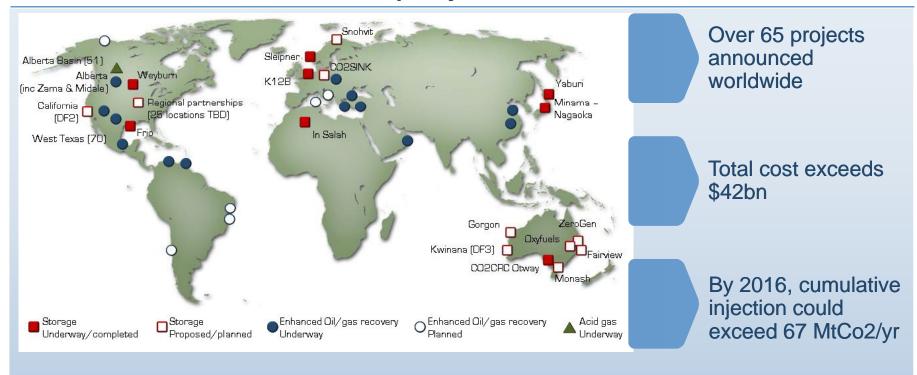
who is doing these projects?



Source: New Energy Finance 2008



there are over 65 CCS projects announced worldwide



0.25% reduction in annual emissions from fossil fuel usage at 2004 levels (based on 27 GtCo2/yr EIA estimate)

Source: New Energy Finance 2008; Map: Geologic Storage of Carbon Dioxide, IEA Greenhouse Gas R&D Programme

new energy finance

building investor confidence





outcomes of a commercial scale project

determine actual cost

gain public acceptance

refine regulatory definitions

prove technical/logistical feasibility

build investor confidence!!!



what is needed for a robust CCS investment environment?

1. sustainable demand for fossil fuels

2. set emissions standards/reduction goals

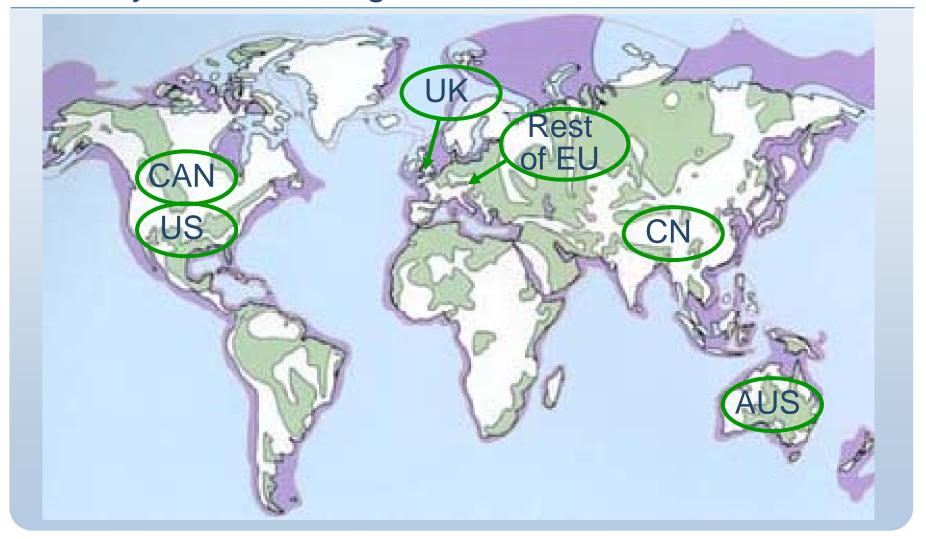
3. legislation/regulatory framework

4. progress toward commercial-scale project(s)

5. funding for projects and infrastructure

new energy finance

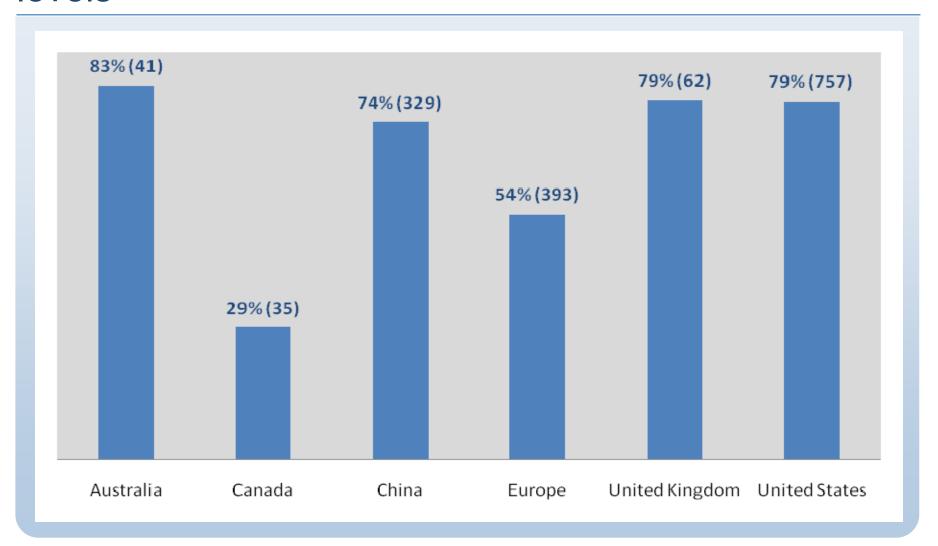
six likely candidate regions



Source: New Energy Finance 2008; Map: Schlumberger



sustainable demand for fossil fuels: % (GW), 2005 levels





emissions standards/reduction goals

- AU: signed Kyoto 108% of 1990 levels between 2008-2012
- CA: signed Kyoto 20% emissions reduction on 2006 levels by 2020
- CN: signed Kyoto 20% emissions reduction on 2005 levels by 2010
 - EU: signed Kyoto 20% emissions reduction on 1990 levels by 2020
 - UK: signed Kyoto 20% emissions reduction on 1990 levels by 2020
 - US: soft commitment to 18% emission intensity reduction

legislation/regulatory framework

AU: \$70m to establish ETS to begin in 2010 (cap & trade); draft legislation for CCS regulatory framework

CA: Climate Change and Emissions Act, Regulatory Framework for Air Emissions

CN: government initiatives

EU: EU ETS; currently setting-up legal/regulatory framework

UK: EU ETS; in talks to establish all-UK regulatory framework

US: drafts at state level; bills hitting congress floor

new energy finance

progress toward commercial-scale project(s)

AU: ZeroGen Mark II

CA: Belle Plaine, ASAP, Heartland

CN: GreenGen

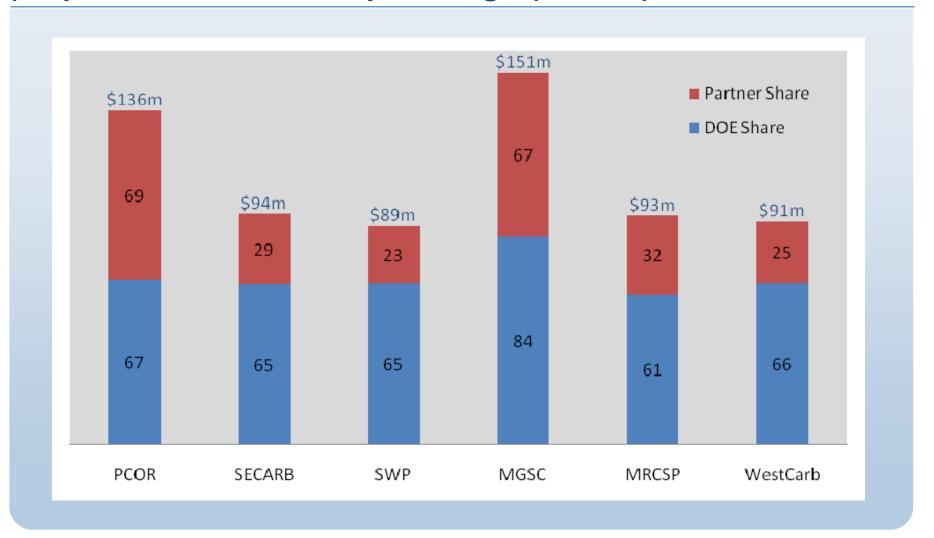
EU: up to 12 demonstration plants commissioned by 2020 costing €6-10bn (\$9.4-15.6bn)

UK: government contest to fund up to 100% of CCS portion of commercial scale PCC plant

US: seven large-scale research projects, and restructured FutureGen likely to bring more

new energy finance

projects funded mainly through public/private consortia





funding for projects and infrastructure

AU: \$2.3bn for climate change, territory funding

CA: CAD250m from federal government in 2008, nothing from Alberta; Alberta formed CCS Development Council

CN: GreenGen approved by two government agencies as 'national high-tech industrialisation program'

EU: revenues from EUAs; budgetary difficulties

UK: government to pay for CCS portion of project; industry dissatisfaction

US: \$1.3bn in support to new projects (starting w/ \$250m)

simplified summary

| | Fossil Demand | Reduction Targets | Legislation | Projects | Funding |
|----|------------------|----------------------|-------------|----------|---------|
| AU | + | + | + | +/- | +/- |
| CA | + | + | +/- | + | +/- |
| CN | + | + | +/- | + | +/- |
| EU | + | + | + | +/- | +/- |
| UK | + | + | + | +/- | +/- |
| US | + | +/- | - | + | +/- |



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new energy finance

www.newenergyfinance.com













CCS Alliance for Risk-based Policy

Risk Evaluation for Commercial Deployment of CCS

Innovative Approaches to Mobilize Financing for Early Plants

Presentation to IEA – WCI CCS Experts Group with IEA GHG R&D Program (New York)

Preliminary Risk Rating Results: Coal-based Plants with CCS May 28-29 2007

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ECONERGY'S BUSINESS

OFFICES & PROJECTS



Carbon Services

- Broker carbon credits in regulated and voluntary markets
- Carbon project
 identification and development support

Access deal flow Provide intellectual identification

- capital to company and clients
- Support development of U.S. Strategy

Consulting

CleanTech Fund

- Raising capital for small-scale generation projects in '8 atin America
- Invested in 3 projects

Renewable Power Production

- Build, own and operate an asset base of renewable energy projects
- Scope, opportunity and inhouse expertise to become a leading developer of clean energy assets
- Wind & hydro in Latin America
- Biomass in U.S.

Raised \$100M on London AIM in Feb. 2006

\$25M in revenues for 2007, from \$3M in 2005.



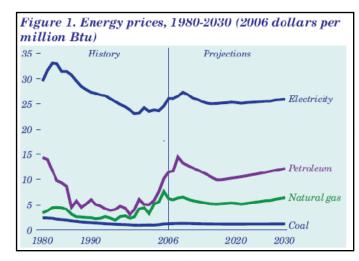
Baseline without Regulations on Carbon: 104 GW of coal added by 2030

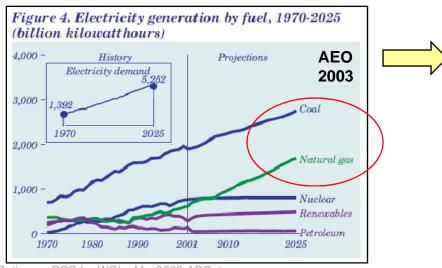
EIA 2008 Projection: MORE fossil use by 2030 in N.America

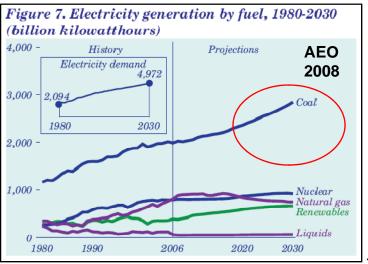
EIA has reduced projections of natural gas use and raised forecasts for coal.

AEO 2008:

In the AEO2008 reference case, electricity generation from natural-gas-fired power plants increases sharply from 2006 to 2008 and then flattens for the next decade, growing by 3 percent from 2008 to 2016. After 2016 generation from new coal, nuclear, and renewable plants displaces some natural-gas-fired generation (Figure 7). In the AEO2008 reference case, 741 bkwhs of electricity is generated from natural gas in 2030, 21 percent less than the 937 bkwhs in 2030 in the AEO2007 reference case. Additions to coal-fired generating capacity in the AEO2008 reference case total 104 GW from 2006 to 2030.



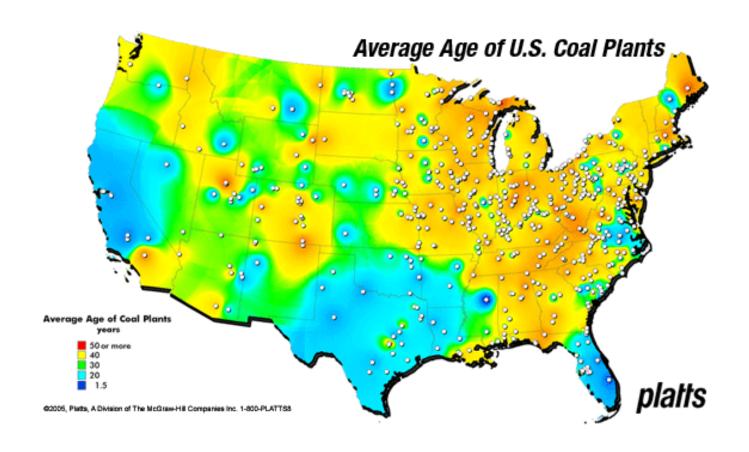




Risk Rating on CCS for WCI – May2008 ADPaterson



Average Age of U.S. Coal Plants (320 GWe)

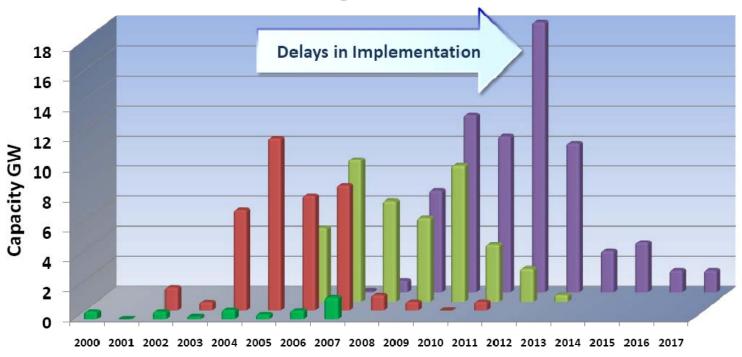


http://www.clean-coal.info/pubs/presentations/Hayes_Coal_PWC_11th_School_of_Mines_May1007.pdf



Planned Coal Plants Delayed

Past Capacity Announcements vs. Actual Figure 1



Historically, actual capacity has been shown to be significantly less than proposed capacity. For example, the 2002 report listed 11,455 MW of proposed capacity for the year 2005 when actually only 329 MW were constructed.

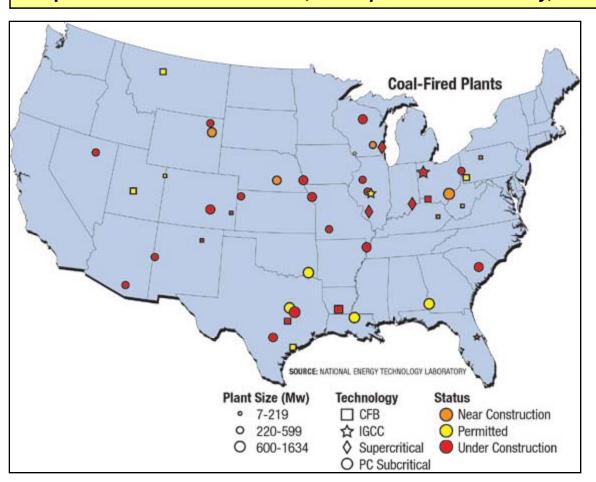






ENR: Coal Plants Under Construction (Feb. 2008)

Despite numerous cancellations, some plants are underway, but CCS is seen as too costly.



ENR (2/27/08):

"For construction contractors, the immediate situation is not dire. About 25 major coal projects totaling more than 15,000 MW now are under construction. Twenty other projects totaling more than 10,000 MW have secured most of their major permits and are poised to enter construction soon."

"Coal projects that are well under way include:

- CPS Energy's 750-MW J.K.
 Spruce Unit 2 in San Antonio, TX;
- Santee Cooper's 600-MW Cross Unit 4 in Cross, SC;
- Springfield (IL) City Water Light
 Power's 200-MW Dallman Unit 4;
- East Kentucky Electric Cooperative's 278-MW Spurlock Unit 4 plant in Maysville, KY. "

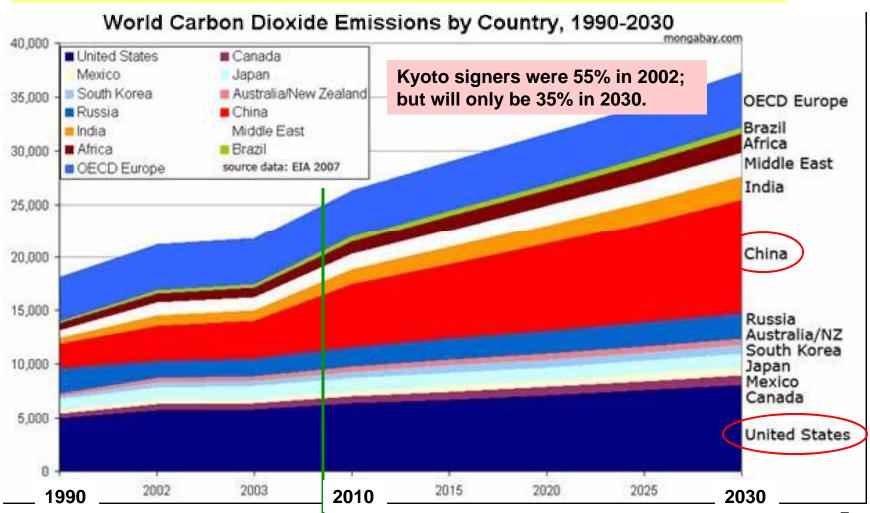
http://enr.construction.com/features/powerIndus/2008/archives/htm/080227p1.asp





Projected CO2 Emissions, 1990 – 2030

"Major Emitters" (Top 10) matter most. U.S.+China = 50% in 2030

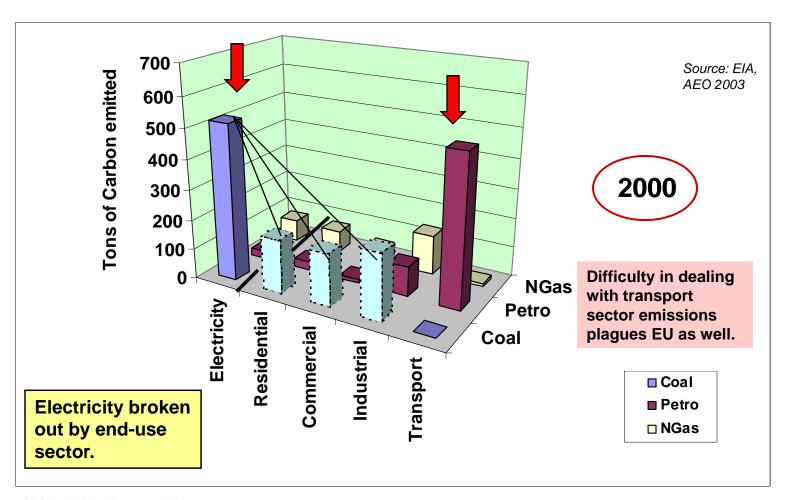




"Where are the U.S. CO2 Emissions"

EIA Baseline: U.S. CO2 Emissions by Sector, 2000

Power sector drew early attention, but transportation is crucial also.

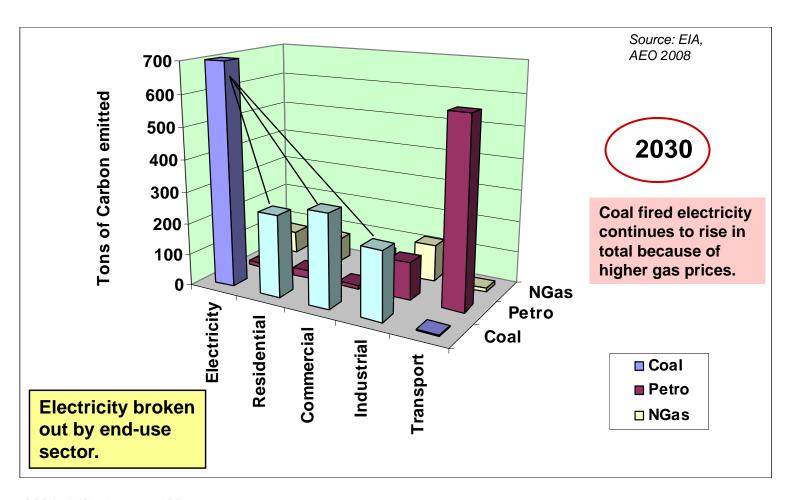




"Where are the U.S. CO2 Emissions"

EIA: U.S. CO2 Emissions by Sector, 2030 est.

Absent a massive turnover in equipment, CO2 emissions keep rising.





"Inconvenient" Challenges for North America...

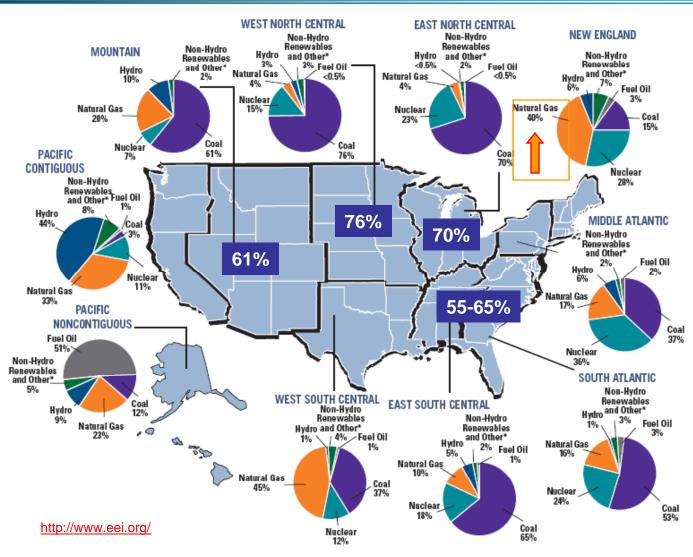
- 1. Retail electricity competition and merchant power mostly failed in the U.S., with major bankruptcies (PG&E, SCE)... and many states remain committed to rate regulation, especially for baseload.
- 2. Consumers don't buy electricity based on price, anyway; it's an essential good and many utilities mask price signals.
- 3. New electricity supply is heavily constrained due to natural limits (wind, sunlight, resources) and regulations no matter the option.
- 4. EE and DSM are vital, but are not sufficient with growth... nor can they replace a lot of "old coal" units (>200,000 MWe).
- 5. U.S. regional differences in electricity fuel mix, prices, and access to renewable resources are <u>severe</u>. Several regions use coal for >60%.
- 6. "Urgent" cap and trade (2012, 2020) in the EU is a mixed bag: emissions are not lower, and other measures (feed-in tariffs, regulations, direct subsidies, local tax policy) are in the mix.
- 7. Because of a huge U.S. budget deficit and national debt, federal fiscal options are limited; need risk-based incentives.





National averages mask very sharp regional differences

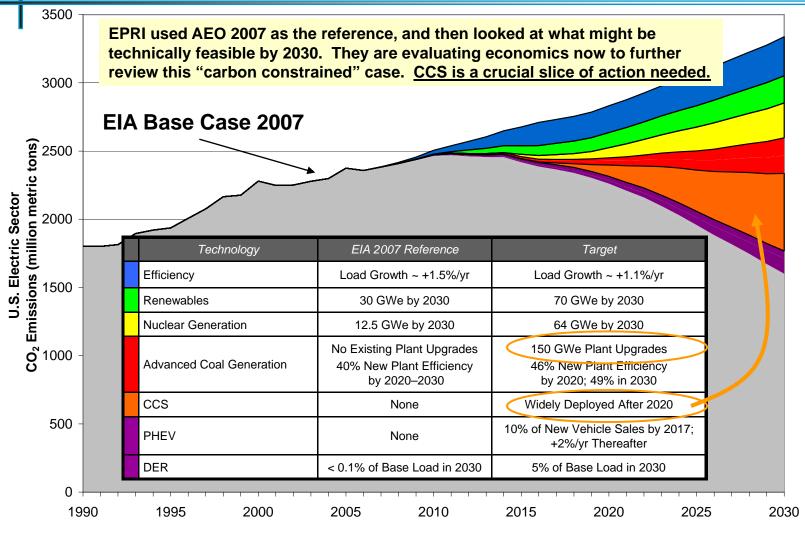
Differing Electricity Mix by Region (EEI), 2005





U.S. carbon emission reduction goals cannot be met without CCS

EPRI "Carbon Constrained" Scenario for Electricity

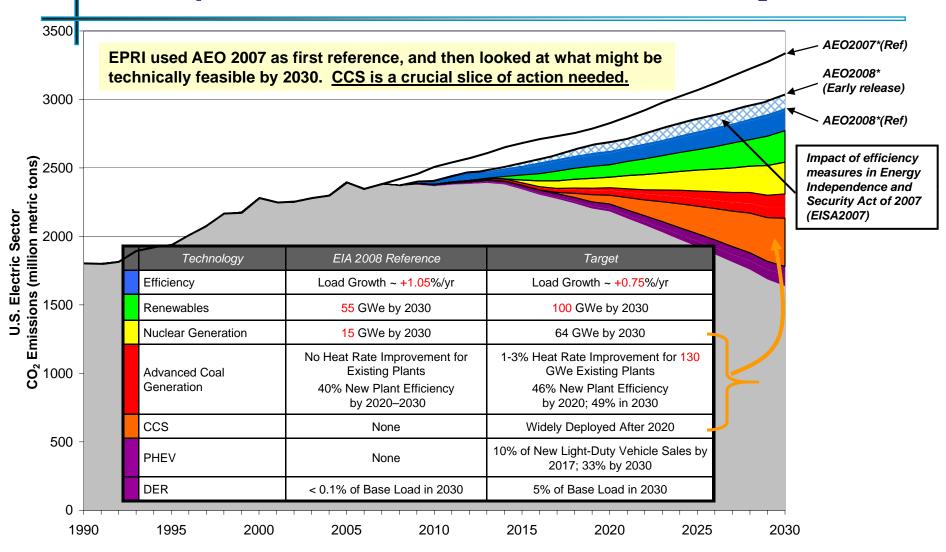


^{*} Achieving all targets is very aggressive, but potentially feasible.

econergy



2008 Updated Prism...Technical Potential for CO₂ Reductions

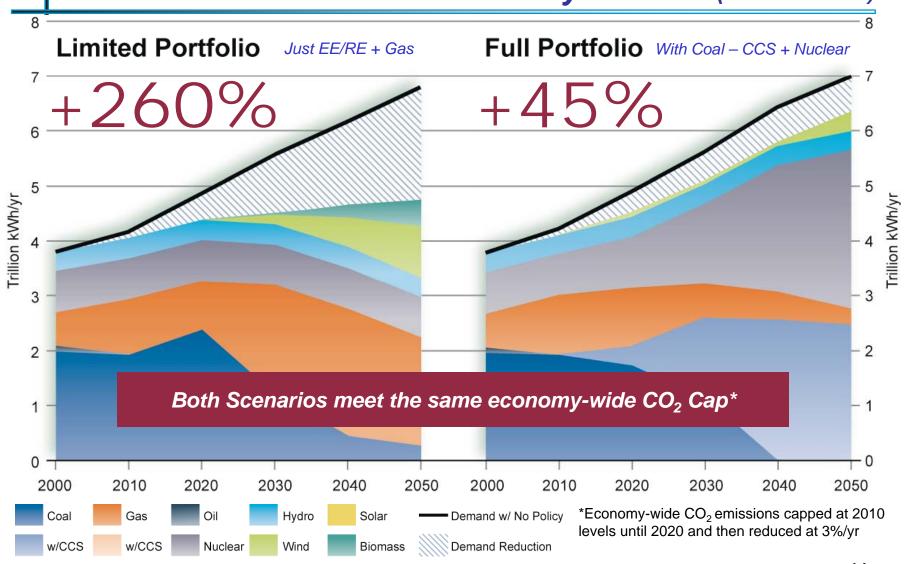


*Energy Information Administration (EIA) Annual Energy Outlook (AEO)



Costs of natural gas and electricity without CCS will run much higher.

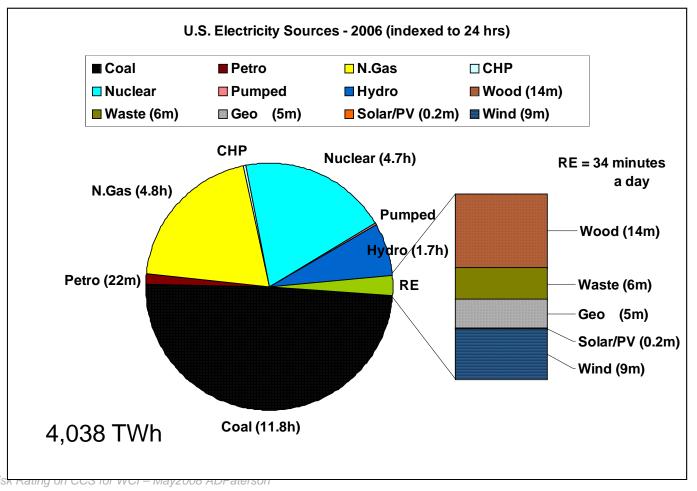
EPRI: Increase in Real Electricity Prices...(2000 to 2050)





U.S. Electricity Sources (2006) - compressed to 24 hours

Natural gas accounts for most growth since 1990; overall demand +33% "Sure, we are more efficient... then we plug more stuff in or buy more."



At 34 minutes a day, Renewables (nonhydro) have a long way to go to replace coal (~12 hours a day). More likely, RE will curb carbon emissions some. and help diversify our fuel base further. Most importantly, RE can help dampen gas price volatility, and reduce some LNG imports.

Regional access to RE differs widely.

Biofuels cannot replace transport fuel rapidly.



Drivers Differ in EU vs. USA... and how to engage Asia?

EU is pushing an "urgent" cap:

- They can't harmonize 27 national tax systems (social contracts)
- An "urgent" (2020) cap is a policy mandate that serves to maintain coalition parliamentary governments
- They want CDM as a means to channel funds to emerging nations
- They are shifting from coal to gas, with market pricing of electricity, rather than regulated pricing
- EU economies face demographic decline, and are stagnant – only 10 million added in EU per decade
- EU is casting energy security on Russian/FSU gas, and need to tax profits from fossil economy – with some interest in coal with CCS.

USA can choose and engage Asia:

- We have a common federal tax system (and active tax lawyers)
- State incentives can supplement and help tailor approaches
- U.S. will be at 50% coal for power, and China, India are using more coal
- USA and Asia are still growing! But,
 U.S. growth is concentrated in "Red"
 states; ... "Blue" states are older, colder
 and losing young people. N.America
 will add 40-50 million people per decade
- Asia leads in building new reactors and U.S. has big stake in nuclear for national security... and GHG gains
- Our future requires baseload and RE, including PHEVs (electrify transport), -a "steady" cap geared to capital markets (2040) would be useful

Ri٤.



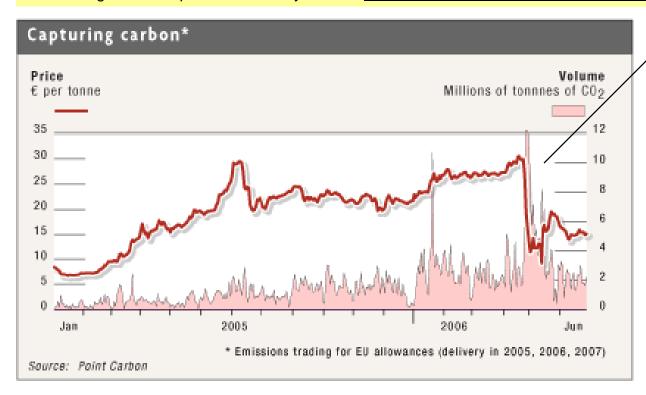
Public sector "gaming"

Turmoil in EU Carbon Market (May 2006)

Europe hopes to avert a false economy in carbon

By Fiona Harvey, June 28 2006 19:38 | Financial Times of London

"What came close to putting the scheme on life support was data released between late April and mid-May which showed that last year – the first the scheme had been in operation – businesses covered by it had been given more permits than they needed <u>because member states had overestimated demand</u>."



"The problem with short term cap and trade (2020) is that it does not give a stable price for carbon – price volatility makes it **more** difficult to attract lenders for new systems and innovative technology."



The next "credit" crisis: carbon credits? (March 2008) UK Regulator (FSA) Posts Risks on Carbon Trading

UK watchdog warns on carbon trading / March 2008

By Fiona Harvey and Ed Crooks

Published: March 31 2008 22:05 | Financial Times of London

The fast-growing market in carbon dioxide emissions poses risks that could threaten other commodities markets, the FSA, Financial Services Authority, warned on Monday. The watchdog said problems including investors being sold unsuitable products, confusion over the regulation of emissions traders, and insufficient official data created risks to both the fledgling global emissions markets and to related commodities such as gas and electricity.

EU traders in fossil fuels and electricity, for instance, factor carbon permit prices into their deals, which can hit consumers. "Cap and trade" systems, which place a limit on the amounts of carbon that companies produce, are widely seen as one of the most promising ways of curbing greenhouse gas emissions at the lowest cost, and have been embraced since 2005 by the EU. In the EU the market is regulated by the European Commission. The FSA does not have a direct hand in regulating the market, and said it had no plans to do so. But it said in a paper published on Monday that "the emissions markets justifiably demand the FSA's continued attention".

The emissions markets have been beset by difficulties, for example in 2006 when it was revealed that more carbon permits had been issued for the first phase of the EU's scheme than were needed. This led to a steep fall in the price of the permits. Among problems cited by the FSA is that some companies authorised for other financial markets may have misled customers by citing their FSA authorisation in relation to carbon trading. The paper warned: "Aside from being misleading and leading to potential enforcement action, this type of behaviour undermines confidence in the market." There was a strong reputational risk to the carbon market from unsuitable products being sold to investors, the FSA said.

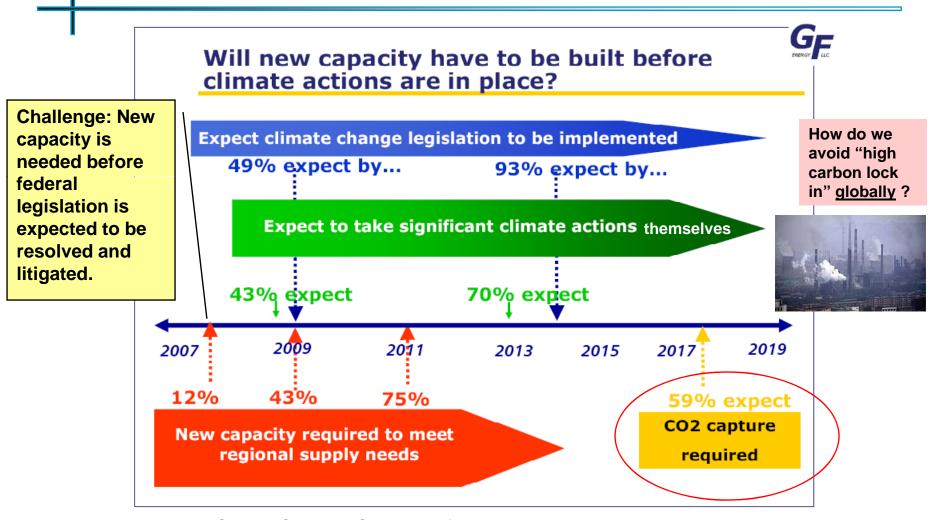
U.K. FSA lists risks of carbon trading: The Financial Services Authority does not govern the carbon market but the watchdog listed risks in a report on carbon regulation:

- The lack of links between emissions trading markets;
- Some companies authorised for other financial markets may have misled customers by citing FSA authorisation;
- Unsuitable products being sold to investors, which could "potentially lead to damage to consumers or to disorderly trading, and a lack of confidence in market";
- The potential lack of appropriate experience among practitioners;
- The quality of information available about emission quantities and allowances;
- The lack of market liquidity. (also on p.A1 of WSJ, April 12, 2008)

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Outlook on U.S. Carbon Policy Timing: Survey of Utility Execs (2007)



Source: Survey by GF Energy of Utility Executives in North America, April 2007



Opportunities & Challenges for CCS

- Opportunities for CCS in New Baseload
- We need to build new baseload to meet new demand, retire "high carbon" units
- Natural gas price volatility and prices provide an opening to build alternatives
- "Plenty o' capital" is available and can be mobilized if risks are addressed
- Challenges
- Long-term CCS remains unproven; large scale demos, RD&D needed
- Geological feasibility, transport affects plant siting and technical designs
- Uncertainty over CCS liability later must be addressed to arrange financing now...
- Approach
- Risks can be delineated, addressed based on experience and insurance models
- Utilize carbon offsets and state incentives to bolster mitigation mechanisms
- Price signals to the <u>CAPITAL</u> markets are more important than to consumers
- Key Threats
- Consumers and PUCs don't want to pay more, and vote against higher rates
- Regional differences and lack of political will run high consensus is elusive



Lehman Brothers Roundtable at NARUC (Nov. 2007), "A Day at the Bond Market"

Bond Market Roundtable on Energy & CCS



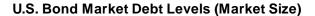
Roundtable participants: Doug Cortez, formerly with Fluor Engineering; Dan Ford, Lehman Brothers; Jim Hempstead, Moody's; Sandy Hochstetter, Arkansas Electric Coop; Lindene Patton, Zurich America; Barbara Tyran, EPRI; Klaus Lambeck, Ohio Public Utilities Commission staff; Mike Smith, Southern States Energy Board; Julie Jorgensen, Excelsior Energy; Faith Klaus, Lehman Brothers. With 32 bond fund managers. Moderator: Andrew Paterson, Econergy

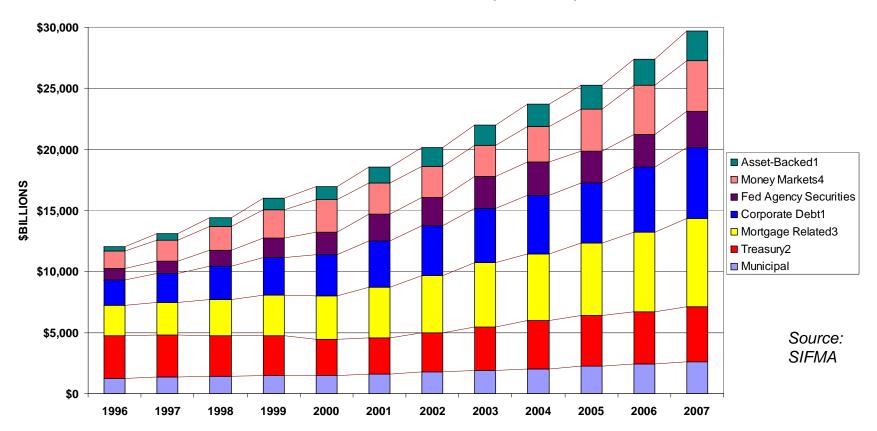


<u>How big is the U.S. Bond Market (1996 – 2007) ?</u>

U.S. Bond Market: Big Enough at \$30 Trillion

Energy infrastructure is financed in bond market, which sees \$6-7T a year in new bond issuance, about \$80-100B for power providers.



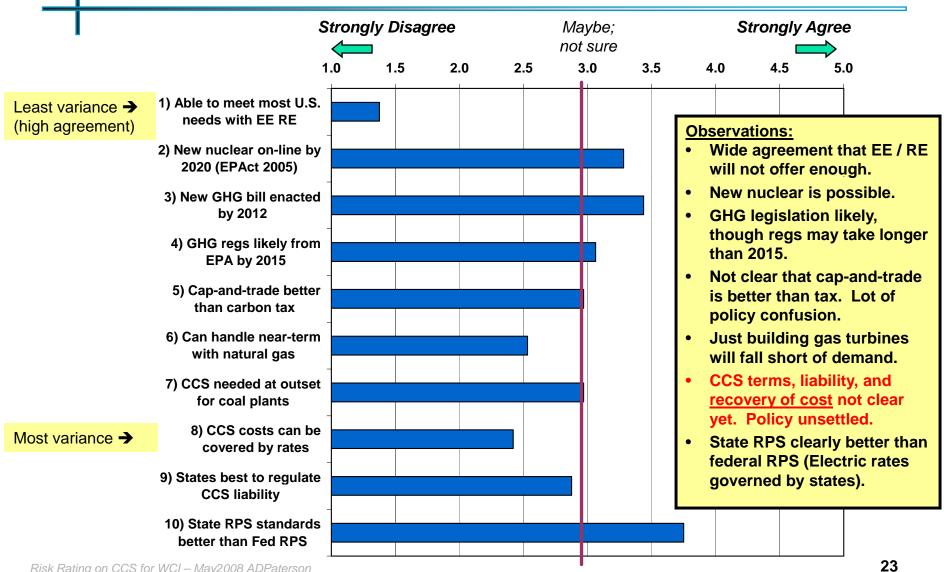


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Bond Fund Viewpoints (32 responses; > \$2 Trillion under management)

Bond Market on Energy Policy (Lehman Roundtable at NARUC, Nov 2007)





CCS Alliance for Risk-based Policy



For Deployment of Coal-based Projects with CCS

Risks → Mitigation Approaches → Actions Needed

CCS Alliance Scope:

- I) Risk Study for CCS Deployment (coal power plants or energy projects with CCS)
- II) Legal research on critical issues, risks and formulation of mitigation options

A) Risk Analysis



1) Tech-CCS

Capital cost with CCS too high

2) Reg-CCS

State rules on CCS not clear

3) ...

4) ...

Analysis based on Interviews of key actors: (results of Risk Study)

| | | Preliminary (21 respondents) | | | |
|-----|------------|-----------------------------------|-------------|-----------|------------|
| | | Risk Ratings (2008) for | P | - 1 | P x I = S |
| Q # | Q Type | Coal Gen with CCS | Probability | Impact | Severity |
| | | | 5 pt. max | 5 pt. max | 25 pt. max |
| 13 | Reg - CCS | Uncertain EPA carbon regs | 4.2 | 4.1 | 17.4 |
| 7 | Tech - CCS | Capital costs on CCS high | 4.0 | 4.3 | 17.1 |
| 18 | Reg | Nat'l subsidies lag on plants | 3.8 | 4.1 | 15.6 |
| 17 | Reg - CCS | State regs on CCS not clear | 3.8 | 4.0 | 15.2 |
| 19 | Reg - CCS | Nat'l incentives for CCS lacking | 3.9 | 3.9 | 14.9 |
| 15 | Reg | CO2 allowances don't fund CCS | 3.6 | 4.0 | 14.5 |
| 28 | Market | Finance difficult (equity, terms) | 3.5 | 4.0 | 13.9 |
| 31 | Market-CCS | EPA regs unclear on CCS | 3.4 | 4.1 | 13.8 |
| 34 | Market-CCS | CCS liability threatens financing | 3.2 | 4.2 | 13.7 |
| 33 | Market-CCS | EOR revenue inadequate for CCS | 3.9 | 3.4 | 13.2 |
| 16 | Reg | Regional support lags on plants | 3.4 | 3.7 | 12.6 |
| 27 | Market-CCS | Market/PUC rates low for CCS | 3.2 | 3.9 | 12.5 |
| 14 | Reg - CCS | Future carbon limits tighter | 2.8 | 4.2 | 11.8 |
| 4 | Tech | High cost of basic materials | 3.3 | 3.6 | 11.7 |
| 1 | Tech | High capital cost (w/o CCS) | 3.1 | 3.8 | 11.6 |
| | | Overall Average | 2.9 | 3.6 | 10.5 |
| | | | | | |
| 12 | Reg | State air permitting delays | 3.0 | 3.3 | 10.2 |
| 10 | Tech - CCS | "Thin" EPC system warranty | 3.1 | 3.1 | 9.6 |
| 8 | Tech - CCS | CCS equipment downtime | 2.4 | 3.8 | 9.1 |
| 20 | Reg | Water use regs tightened | 2.8 | 3.3 | 9.1 |
| 26 | Market | Interest rates rise (to 2012) | 2.6 | 3.5 | 9.1 |
| 5 | Tech | Constrained EPC capacity | 2.9 | 3.2 | 9.0 |

B) Mitigation **Mechanisms**



Government

- Loan guarantees
- Grants (DOE, etc.)
- Tax subsidies
- Injection regulations
- Permitting approaches
- Carbon emission rules
- Federal "Energy Bank"
- Revolving loans

Industry / Investors

- Insurance / bonding
- Engineering backups
- Long-term contracts
- Site review, feasibility
- Collateral, backup supply

C) Government **Actions needed** for Mitigation

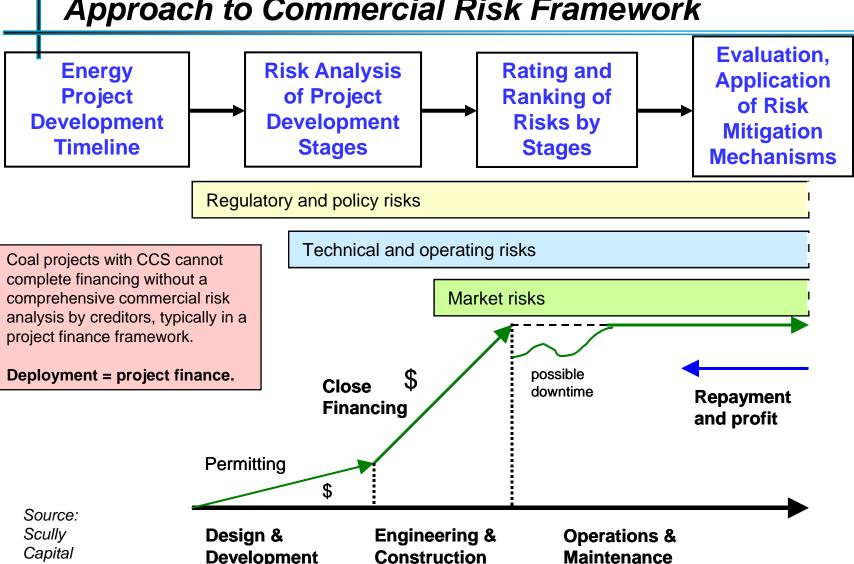
(Match actions with mechanisms)

Near-term / Long-term

- **Appropriations**
- Legislation
- Tax bill
- Regulation
- Agency action
- Executive order (?)
- Reserves (e.g., SPRO)
- Others?



Approach to Commercial Risk Framework





Plot of Risks Based on their Attributes (Likelihood, Severity of Impact)

Lower Likelihood Higher Impact

Accidents

(Plant fires, or spikes in feedstock costs or a gas price slump with loss of competitiveness)

Probability of Event

Low Likelihood Low Impact

Marketing and Operations

(Workforce issues, coal transport, transmission congestion, etc.)

High Likelihood High Impact Negotiating space for public and private sectors

"Show-Stoppers"

(e.g., high capital costs with CCS, or lack of clarity about carbon regs)

Higher Likelihood Lower Impact

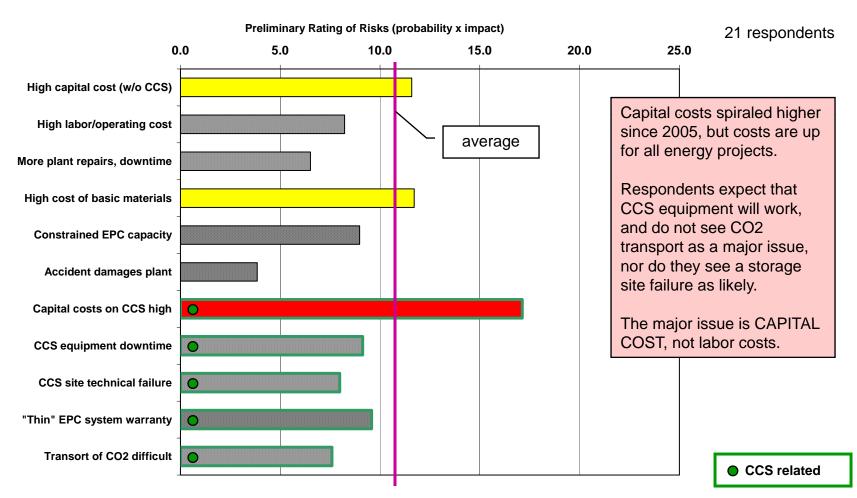
Externalities (e.g., pollution)

Or lax enforcement, lack of standards



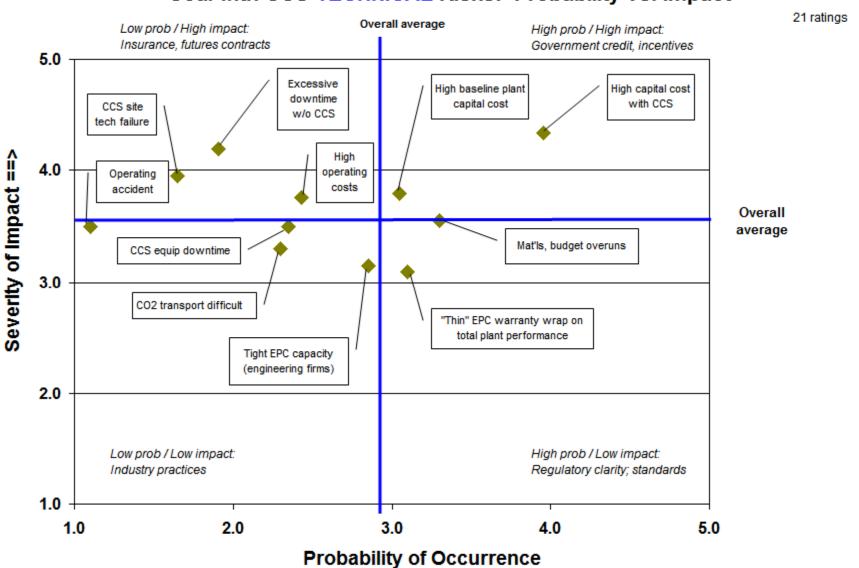
Risk Ratings: TECHNICAL

Deploying CCS creates a large drain on plant production, so capital costs run much higher.





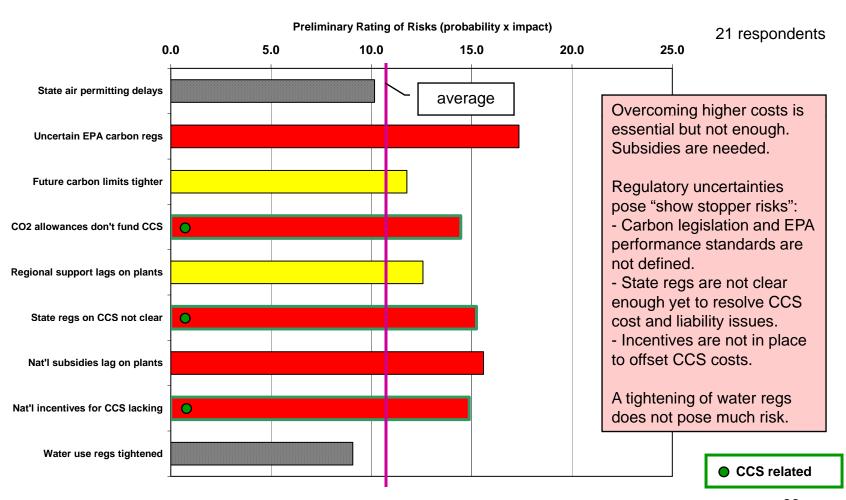
Coal with CCS TECHNICAL Risks: Probability vs. Impact





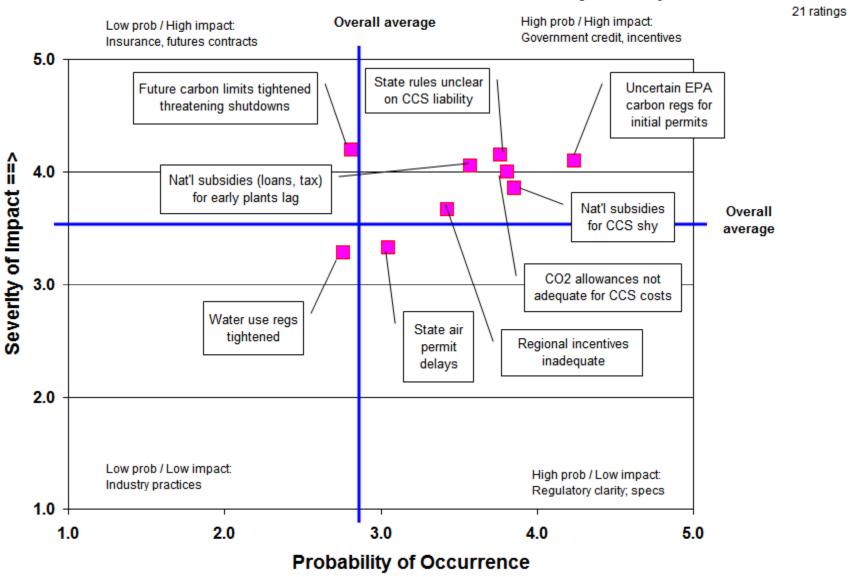
Risk Ratings: REGULATORY

Regulatory uncertainties (federal + state) about CCS costs and liability threaten financing.





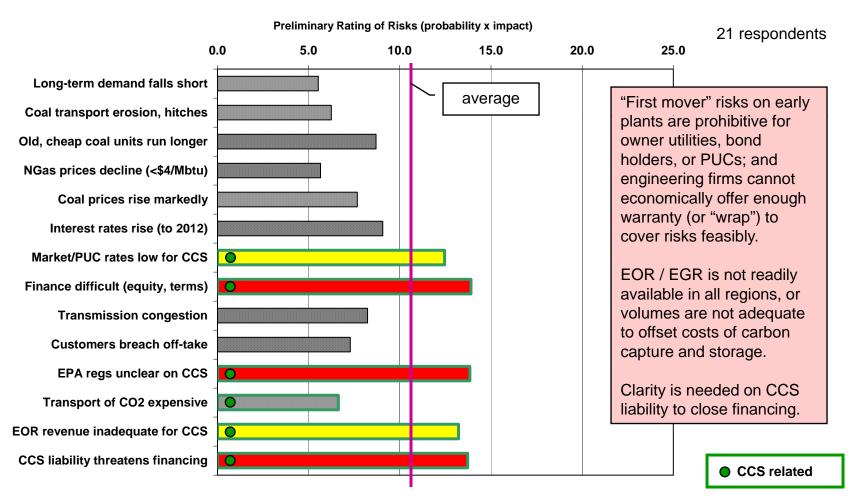
Coal with CCS REGULATORY Risks: Probability vs. Impact



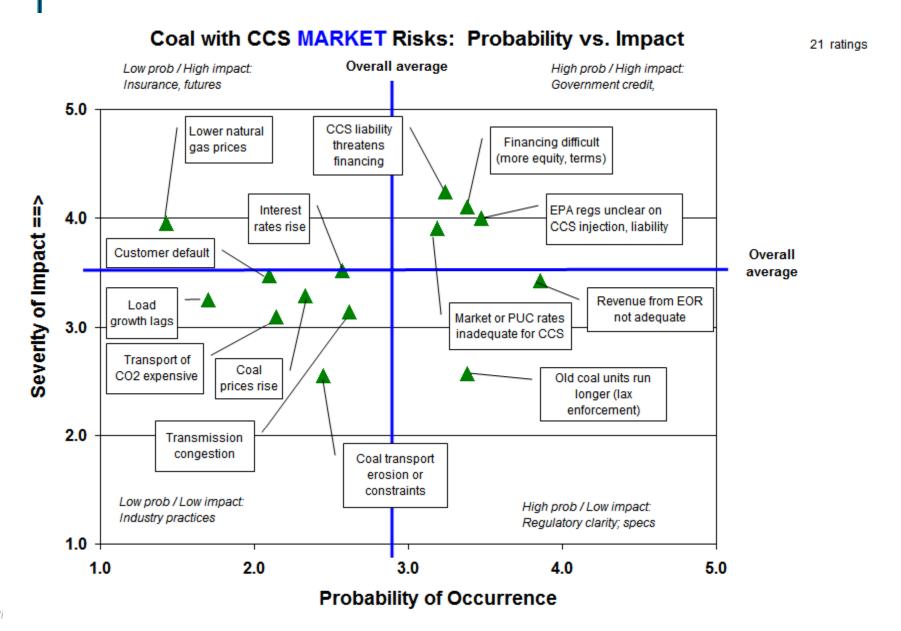


Risk Ratings: MARKET

Lack of subsidies and uncertainty about liability for CCS make financing very difficult.











Risk Study: Technical, Regulatory, Market Risks

| | | Preliminary (21 respondents) | | | |
|-----|------------|-----------------------------------|-------------|-----------|------------|
| | | Risk Ratings (2008) for | Р | I | PxI=S |
| Q # | Q Type | Coal Gen with CCS | Probability | Impact | Severity |
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| 4 | Tech | High cost of basic materials | 3.3 | 3.6 | 11.7 |
| 1 | Tech | High capital cost (w/o CCS) | 3.1 | 3.8 | 11.6 |
| | | Overall Average | 2.9 | 3.6 | 10.5 |
| | | | | | |
| 12 | Reg | State air permitting delays | 3.0 | 3.3 | 10.2 |
| 10 | Tech - CCS | "Thin" EPC system warranty | 3.1 | 3.1 | 9.6 |
| 8 | Tech - CCS | CCS equipment downtime | 2.4 | 3.8 | 9.1 |
| 20 | Reg | Water use regs tightened | 2.8 | 3.3 | 9.1 |
| 26 | Market | Interest rates rise (to 2012) | 2.6 | 3.5 | 9.1 |
| 5 | Tech | Constrained EPC capacity | 2.9 | 3.2 | 9.0 |

From interviews of key actors (owners, builders, financial entities. agencies, states) critical risks in three major areas are evaluated in a project finance credit analysis framework. Risks are rated (1 to 5) for "likelihood" and "impact" if a risk event occurs. The product (25 point scale) provides a "severity" of risk for specific events affecting deployment with CCS.

Sample respondents: Conoco, GE, Siemens, Air Liquide, Warley Parsons, CH2M Hill, GTC, Excelsior Energy, Burns & McDonnell, Oglethorpe, Eastman Chemical, Hensley, Pace Energy, and EPRI, WCI.



Preliminary Risk Ratings on CCS – SUMMARY

- Capital costs have run up since 2005, but costs are up for projects worldwide.
- Respondents expect that CCS equipment will work, and do not see CO2 transport as a major issue, nor do they see a CCS site failure as likely.
 CAPITAL COST for the plant with CCS is the key barrier, not labor costs.
- Subsidies are needed to overcome higher costs, but that is not enough. (Subsidies could be paid for by injection fees on CO2, or user levies on coal)
- Regulatory uncertainties pose "show stopper" risks for deployment of CCS:
 - Carbon emission legislation and EPA regulatory rules on CCS are not defined.
 - State regulations are not clear enough yet to resolve CCS cost and liability issues.
 - Incentives (tax credits, loans, allowances) are not in place to offset higher CCS costs.
 - A tightening of water regulations does not pose much of a risk currently.
- "First mover" risks are prohibitive for owner utilities, bondholders, or PUCs; and engineering firms cannot economically offer enough warranty (or "wrap") to cover risks. Few owners want to finance early CCS demos and plants.
- EOR is not readily available in all regions, or demand is not adequate to absorb costs and volumes needed for carbon capture and storage from power plants.
- Clarity is needed on CCS liability to close financing perhaps a "showstopper".
- Increases in coal prices or interest rates were not rated high risks.
- Lower NGas prices (<\$5) would pose competitive problems; not seen as likely.



Risks rated previously WITHOUT CCS

Summary: Risk Ratings for Coal Gasification (2005-06)

| | 25 pt. scale (5 x 5 = 25) | Co-Prod'n | Co-Prod'n | 20 | | 50Rs |
|-----|------------------------------------|--------------------|-----------|-------------|---|------|
| | Risk Area for IGCC | Α | В | 2006 | | 2005 |
| Q# | Highest Risks | Probablty Severity | | rity Rating | | IGCC |
| 1 | High capital cost | 3.6 | 4.5 | 16.0 | | 14.9 |
| 3* | Excessive downtime | 2.5 | 3.7 | 8.9 | + | 13.1 |
| 6 | Lack of EPC capacity to build | 3.6 | 3.7 | 13.1 | | 6.5 |
| 8 | Materials & budget overruns | 3.6 | 4.0 | 14.2 | _ | 10.9 |
| 10 | Thin EPC / vendor wrap | 3.4 | 3.5 | 11.7 | | 9.5 |
| 12* | State air permitting delays | 2.2 | 3.4 | 7.2 | | 13.0 |
| 18* | Regional policy on sequest lag | 3.0 | 2.7 | 7.8 | | 11.4 |
| 19 | Nat'l incentives on plants lag | 3.3 | 4.2 | 13.7 | | 11.8 |
| 28 | Financing difficult (equity, terms | 3.0 | 4.2 | 12.4 | | 13.0 |
| 29 | DOD purchase agreement thin | 4.0 | 3.9 | 15.2 | | NR |
| 30 | Long-term off-take inadequate | 3.4 | 4.1 | 13.9 | | NR |
| | Overall Average | 2.6 | 3.3 | 8.7 | | 9.0 |

- Concerns about high capital cost rate highest for co-production plants.
- Concerns about cost overruns and tight EPC capacity also are elevated.
- Uncertainties about off-take and incentives add to financing challenges.
- Combined, these risks explain why plants are not being built, unaided.



Plot of Risks Based on their Attributes (Likelihood, Severity of Impact)

Lower Likelihood Higher Impact

Accidents

(Insurance, long-term or futures contracts, backup supplies, spare subsystems, site surveys)

Probability of Event

Low Likelihood Low Impact

Marketing and Operations

(Well-grounded management practice, internal audits, training)

High Likelihood High Impact

"Show-Stoppers"

(Requires government subsidies, risksharing, credit support, rate-based or long-term off-take agreement)

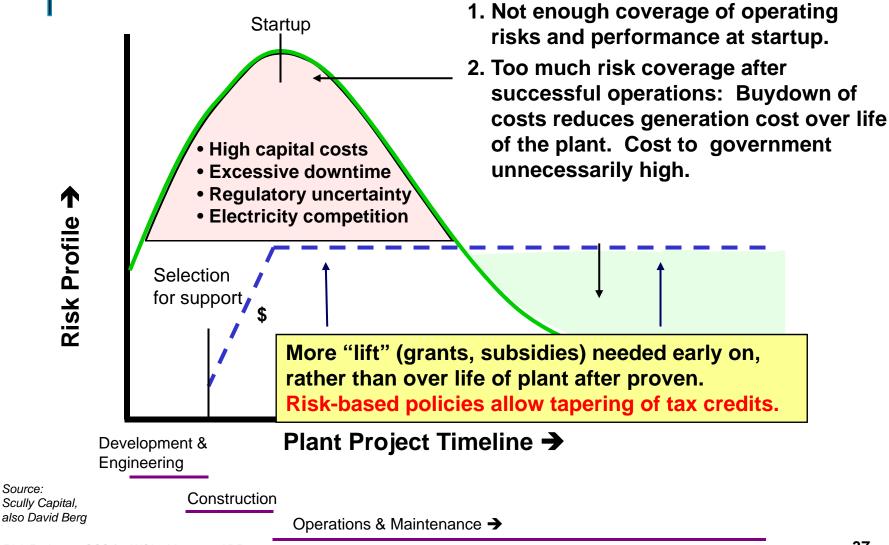
Higher Likelihood Lower Impact

Externalities (e.g., pollution)

(Regulatory clarity, system standards – like EPRI CoalFleet UDBS)



First of a Kind Systems: High Risk Early



Source:



Different Risks Require Different Approaches

Risk-based approaches are more complex, require more work, but cost less and/or spread benefits to more states more regions, more projects with broader impact for the same budget cost. Policy mechanisms overlap, but a risk-based negotiation spreads the benefits.

| Key risks | Cost-based Policies | Risk-based Policies | | | |
|-------------------------------------|----------------------------------|------------------------------------|--|--|--|
| High plant capital costs for CCS | Grants, ITCs (tax credits) | Loans, preferred equity | | | |
| "First of a kind" plant costs | Federal RD&D, grants | Loan guarantees, preferred equity | | | |
| Excessive downtime | Federal RD&D, grants | Standby credit, backup systems | | | |
| Feedstock shortages, poor quality | Capacity payments | More storage, alternative supply | | | |
| Shifting regulations on feedstocks | Grants, waivers | Alternative supply, waivers | | | |
| Higher transport costs of feedstock | Subsidies | Infrastructure investment | | | |
| High processing / operating costs | Property tax relief, PTCs | Engineering, demonstrations | | | |
| EPC contractor constraints | Educational programs (engrs) | RD&D, feasibility study grants | | | |
| Revenue uncertainty, price flux | Government off-take | Financing more storage | | | |
| Lagging private investment | Grants, ITCs, early PTCs | Loans, preferred equity | | | |
| Revenue and off-take uncertainty | Purchase agreements by gov't | Standby (step-in) agreements | | | |
| Uncertain CCS regulatory regime | Prescribed rules (e.g., EPA UIC) | Private insurance + gov't backstop | | | |
| Carbon emission policy uncertainty | Cap with safety valve | Long-term capital subsidies (ITCs) | | | |



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Wrap-up Points for CCS Deployment

- With dependence in U.S. on coal-based electricity for 12 hours a day (50% of supply), CCS is vital for progress on carbon emissions.
- The current pace of electricity demand and the sharp rise in natural gas prices require that advanced coal plants be built now.
- If risks are addressed through a mix of policies and demos, early plants can be built with CCS to demonstrate feasibility.
- CCS is not economic and subsidies will be needed for first plants.
- Grants and tax credits are easy for industry to ask for, but are difficult for Congress to fully fund. Levies on coal may be needed; but those funds would need to be sequestered for coal projects.
- Risk-based policies (such as loan guarantees, capacity payments)
 can help stretch limited government funds across more projects.
- Utility bond holders require certainty on CCS liability with no indefinite, long-term exposure. Private owners and insurance can manage first losses, states may want to play to encourage plants.
- Some tools are in place, but legislation is needed to resolve uncertainties. Financing is key: No financing = no CCS deployment.



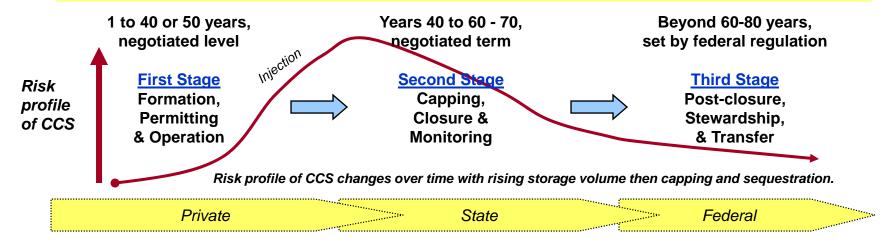
Path Forward Must Mobilize Debt Capital

- Set a long-term cap (2040), economically and physically feasible
- Use "output-based" regulatory performance standards for fossil use
- Provide capital incentives for GHG emission mitigation
- Use fees on fossil use to fund capital incentives via dedicated trust
 - Fees would be geared to carbon emitted (Ed Rubin et. al., CMI)
 - Trust fund prevents governments from misusing receipts (prevents earmarking)
 - Some receipts could be used to support low income households
- Use the bond market to finance infrastructure with carbon mitigation
- Lenders / bond holders demand "predictable, steady cash flow" with strong, creditworthy off-takers
- WBCSD: Forge an international trading market built on <u>national</u> policies among top 10-12 "Major Emitters". Use treaties (vs. U.N.)
- Allow carbon offsets in developing countries to be traded among the Major Emitters (Maintain CDM / JI process in growing nations)
 [Curbing consumption for growing nations is a form of oppression]



Insurance / bond can transfer CCS Risk Over Time ->

Insurance or bonding enacted regionally and chartered by state can be utilized to spread risk and <u>negotiate</u> the cost and liability for carbon leakage over time. Bonding (cash + carbon offsets) can be transferred over time.



<u>Privately managed</u> **Insurance or bonding** Mitigation of CCS risks

"State chartered" bonding, regulated by state insurance commissioners, with site monitoring, annual fiscal reporting

- Capitalized by private sector as a "first loss reserve" for CCS leakage or damages; multiple plants/sites could capitalize same bond or risk pool.
- Each site brings multiple policy holders
- Federal backstop helps provide finite risk level for initial financing of plant

Optional: State Supervision
Insurance or bonding
Mitigation of CCS risks

States supervise permitting of capping and closure

- To encourage initial financing states can negotiate eventual transfer terms
- Trust assets are available for transfer with the potential liability
- Gathering assets and liabilities from multiple projects with CCS helps diversify risk across multiple sites

<u>Federal Repository</u> **Assumption or bonding**Mitigation of CCS risks

Federal backstop beyond first reserve handles long-term major uncertainties

- Long term assumption by a federal agency (or Treasury) boosts financing for new energy infrastructure with CCS
- Shared risk avoids the "moral hazard" of dumping all liability to a federal agency. And, the long-term risk is manageable for the federal government with bond assets.



IOGCC CCS Legal Framework (State-based)

September 2007:

The thirty member states and four Canadian affiliate member provinces of the IOGCC are well suited for regulation of CO2 because of their jurisdiction, experience, and expertise in the regulation of oil and natural gas production, particularly in the use of enhanced oil recovery (EOR), which uses carbon storage.

Scott Anderson, an Energy Policy Specialist for Environmental Defense and an observer to the Task Force deliberations, said that state oil and gas regulators have developed a set of model carbon storage requirements that are thoughtful, rigorous and not a walk in the park for industry.

"The IOGCC model rules will certainly be subject to revision as they are reviewed by more people and as more knowledge about geological sequestration is made. IOGCC's work, however, is a strong, major step forward in the ongoing conversation about how to do carbon sequestration right," said Anderson.

The report recommends that states and provinces actively solicit public involvement in the process as early as possible and that the process is as transparent as possible. In addition the report stresses that CO2, which is generally considered safe and non-toxic, be viewed in a manner that allows beneficial uses of CO2 following removal from regulated emission streams. Contaminants and pollutants such as hydrogen sulfide, NOx and SOx should remain regulated for public health and safety and other environmental concerns, the report says.

Additionally, the Task Force has proposed a two-stage Closure Period and Post-Closure Period to deal with long-term monitoring and liability issues. The operator of the storage site would be liable for a period of ten years after the injection site is plugged, unless otherwise designated by the state regulatory agency. At the end of the Closure Period, the liability for ensuring that the site remains a secure storage site during the Post-Closure Period would transfer to the state. A [bonding instrument] that is industry-funded and state administered would provide the necessary oversight during the Post-Closure Period. The bonding could be funded by an injection fee assessed to the Carbon Storage Project operator and calculated on a per ton basis.



Wrap-up: Capital Incentives First, with Long-term Cap

- The fundamental issue is accelerating the turnover of "High Carbon" energy infrastructure to low-carbon, efficient systems:
 - Renewables, Power generation with CCS and grid upgrades are all needed
 - End-use efficiency in buildings extends time to turnover capital stock
 - Regulation for CCS is critical to mobilizing debt capital in the bond market
- Large energy infrastructure is built with debt, not risk-oriented capital
- Capital incentives promote economic growth, which is needed to fund innovation and regional infrastructure, and change demand
- Capital incentives foster engineering and innovative technology
- OECD <u>capital</u> markets are large, liquid, and efficient
- Short-term cap & trade can create bureaucratic inefficiencies and incentives for "gaming" and is very difficult to monitor and enforce
 - Economy-wide reporting and monitoring costs are extensive what to do with cheaters
 - Uneven impact creates large scale winners and losers by region and sector
- Natural sources of carbon are vast and not "capped"
- Incentives engage big developing economies (China, India, etc.)
- A <u>long-term cap (2040) with stable prices</u> mobilizes the bond market

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Background References

- Coal plants under construction by type (ENR)
- IPCC Technical Risk Framework for CCS
- GCEP Technical Mitigation Framework (Stanford)
- Carbon Price Volatility
- Utility Cap Ex 2006 2008



ENR: Coal Plants Under Construction (Feb. 2008)

Despite numerous cancellations, some plants are underway, but CCS is seen as too costly.

Net Power Output of Combustion Projects Currently Under or Near to Construction

| | Bitum. | Sub- bitum | Lignite | Pet coke | Total MW (% of total) |
|------------------|---------|---------------|---------|----------|--------------------------|
| Supercritical PC | 4,150 | 2,100 | 1,600 | - | 7,850 (50.2) |
| Subcritical PC | 1,620 | 4,040 (1) | - | - | 5,660 (36.2) |
| CFB | 850 (2) | 40 | 630 | 600 | 2,120 (13.6) |
| Total, MW | 6,620 | 6,180 | 2,230 | 600 | 15,630 |
| (% of total) | (42.4) | (39.5) | (14.3) | (3.8) | |

(1) Includes 280 MW of sub-bituminous waste (2) Includes 290 MW of bituminous waste

Table 1-6 Net Power Output of Combustion Projects with Permits

| | Bitum. | Sub- | Bitum | Pet coke | Total MW | | |
|------------------|--------|--------|-------|----------|--------------|--|--|
| | | bitum | waste | | (% of total) | | |
| a 44 17a | | 1.00= | | | | | |
| Supercritical PC | 338 | 1,987 | | | 2,325 (43.5) | | |
| Subcritical PC | 600 | 600 | | | 1,200 (22.5) | | |
| CFB | 270 | 250 | 465 | 830 | 1,815 (34.0) | | |
| Total, MW | 1,208 | 2,837 | 465 | 830 | 5,340 | | |
| (% of total) | (22.6) | (53.1) | (8.7) | (15.6) | | | |

Source: NETL, EPRI



IPCC Overview of CCS Risks

The risks due to leakage from storage of CO2 in geological reservoirs fall into two broad categories: global risks and local risks. Global risks involve the release of CO2 that may contribute significantly to climate change if some fraction leaks from the storage formation to the atmosphere. In addition, if CO2 leaks out of a storage formation, local hazards may exist for humans, ecosystems and groundwater. These are the local risks. With regard to global risks, based on observations and analysis of current CO2 storage sites, natural systems, engineering systems and models, the fraction retained in appropriately selected and managed reservoirs is very likely to exceed 99% over 100 years, and is likely to exceed 99% over 1000 years. Similar fractions retained are likely for even longer periods of time, as the risk of leakage is expected to decrease over time as other mechanisms provide additional trapping.

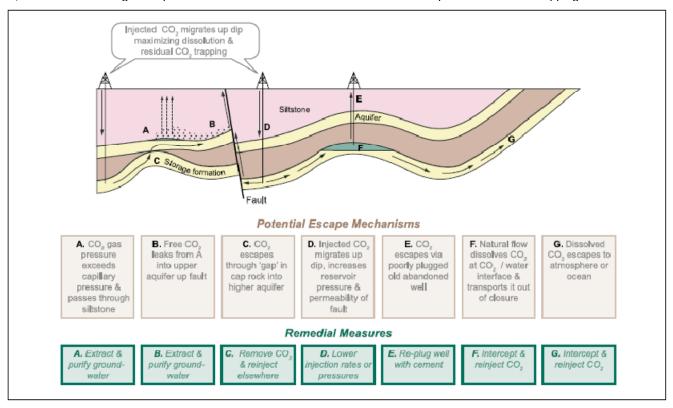


Figure TS.8. Potential leakage routes and remediation techniques for CO₂ injected into saline formations. The remediation technique would depend on the potential leakage routes identified in a reservoir (Courtesy CO2CRC).



Mitigation Built on Science, Industrial Experience

A sound risk mitigation strategy can be built on scientific methodologies and industrial experience.



Geological Storage Safety and Security Pyramid

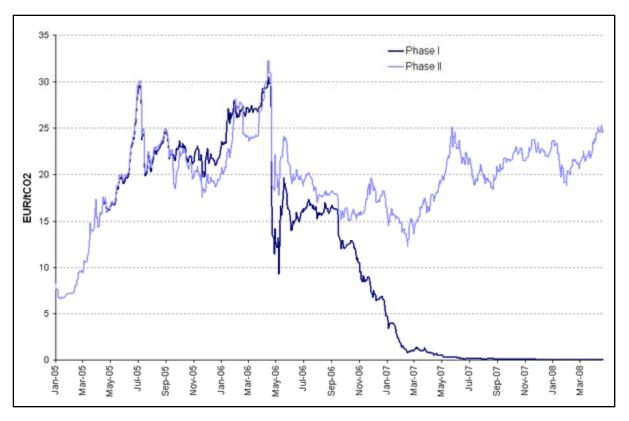


"... the fraction retained in " With appropriate site selection informed by available appropriately selected and subsurface information, a managed geological Financial monitoring program to detect reservoirs is likely to exceed 99% over 1.000 problems, a regulatory system, Responsibility and the appropriate use of years." IPCC, 2005 remediation methods..." Regulatory Oversight IPCC, 2005 Remediation Source: Dr. Sally Benson, Monitoring GCEP at Stanford, in WRI Workshop June 5, 2007 Safe Operations Storage Engineering Site Characterization and Selection Fundamental Storage and Leakage Mechanisms



Recent (Apr 2008) Phase II EU Carbon Prices

Note: A short-term cap-and-trade (i.e., geared to 2020 vs. 2040) without a safety valve will not generate a stable price for carbon emissions, but volatile prices instead – particularly because consumers cannot easily switch away from current consumption and new supply takes a long time to come online. This creates MORE uncertainty for bond investors seeking to evaluate investments in long-lived coal-fired power plants with CCS. A long-term cap-and-trade (2040) regime is better geared to the capital markets and thus will mobilize more debt capital for low-carbon systems.







Utility CapEx Forecast: 2006 – 2008

| | 0 1 1 5 4 | | | | (ΦN 4:1) | (Φ B 4:1) | (ΦB 4:1) | (Φ B 4:1) | 00 / 100 | |
|----------|---------------------------------|------------|-----------|----------------|----------|-----------|----------|-----------|-----------|----------|
| Danie. | Source: Lehman Brothers | 04-4 | NEDO | D:III O10 | (\$Mil) | (\$Mil) | (\$Mil) | (\$Mil) | 06 to '08 | 0/ T-4-1 |
| \vdash | Company | States | NERC area | Building Coal? | 2006 | 2007E | 2008E | Sum | Growth | % Total |
| 1 | Dominion Resources | VA | SERC | Yes | \$4,052 | \$4,400 | \$4,600 | \$13,052 | \$548 | |
| 2 | American Electric Power | OH, TX | RFC | Yes | 3,528 | 3,867 | 3,026 | 10,421 | -\$502 | |
| 3 | FPL Group, Inc. | FL, SC | FRCC | No (was) | 3,507 | 5,198 | 4,258 | 12,963 | \$751 | |
| 4 | Duke Energy | IN, OH, NC | SERC, RFC | Yes | 3,381 | 3,500 | 3,500 | 10,381 | \$119 | |
| 5 | Southern Company | GA, MS | SERC | Yes | 2,994 | 3,911 | 4,525 | 11,430 | \$1,531 | |
| 6 | Edison International | CA | WECC | No (but BP) | 2,536 | 3,161 | 2,951 | 8,648 | \$415 | |
| 7 | Exelon Corp. | PA, IL | RFC | No | 2,418 | 2,801 | 2,801 | 8,020 | \$383 | |
| 8 | PG&E | CA | WECC | No | 2,402 | 3,200 | 2,800 | 8,402 | \$398 | |
| 9 | TXU Corp. | TX | ERCOT | Yes | 2,180 | 2,870 | 3,400 | 8,450 | \$1,220 | Top 10 |
| 10 | Consolidated Edison | NY | NPCC | No | 1,921 | 1,800 | 1,800 | 5,521 | -\$121 | 55% |
| 11 | Xcel Energy | MN, CO | MRO, WECC | Yes | 1,626 | 1,900 | 1,900 | 5,426 | \$274 | |
| 12 | Entergy Corp. | AL, AR, LA | SERC | No? | 1,614 | 1,738 | 2,001 | 5,353 | \$387 | |
| 13 | Progress Energy | NC, SC | SERC | Yes? | 1,425 | 2,400 | 2,500 | 6,325 | \$1,075 | |
| 14 | DTE Energy | MI | RFC | Yes? | 1,403 | 1,500 | 1,500 | 4,403 | \$97 | |
| 15 | PPL Corp. | PA | RFC | ?? | 1,394 | 1,747 | 1,398 | 4,539 | \$4 | |
| 16 | Ameren Corp | PA | RFC | No | 1,284 | 1,300 | 1,300 | 3,884 | \$16 | |
| 17 | FirstEnergy Corp. | ОН | RFC | Yes | 1,170 | 1,451 | 1,722 | 4,343 | \$552 | |
| 18 | Constellation Energy | MD | RFC | No? | 1,149 | 265 | 490 | 1,904 | -\$659 | |
| 19 | Centerpoint Energy | TX, OK? | SPP | No | 1,121 | 1,055 | 1,016 | 3,192 | -\$105 | Top 20 |
| 20 | Public Service Enterprise Group | NJ, PA? | RFC | ?? | 1,015 | 1,343 | 1,681 | 4,039 | \$666 | 80% |
| 21 | Sierra Pacific Resources | NV | WECC | ?? | 986 | 1,512 | 1,800 | 4,298 | \$814 | |
| 22 | Wisconsin Energy | WI | MRO | Yes | 929 | 1,400 | 1,030 | 3,359 | \$101 | |
| 23 | Northeast Utilities | WI, MN? | MRO | ?? | 880 | 1,300 | 1,128 | 3,308 | \$248 | |
| 24 | Puget Energy | WA | WECC | ?? | 834 | 650 | 625 | 2,109 | -\$209 | |
| 25 | CMS Energy | MI | RFC | ?? | 670 | 847 | 795 | 2,312 | \$125 | |
| 26 | Arizona Public Service Co. | AZ | WECC | ?? | 667 | 950 | 950 | 2,567 | \$283 | |
| 27 | Scana Corp. | SC | SERC | ?? | 485 | 728 | 841 | 2,054 | \$356 | |
| 28 | Great Plains Energy | ND | MRO | ?? | 476 | 832 | 1,075 | 2,383 | \$599 | |
| 29 | Pepco Holdings | DC, MD | RFC | ?? | 475 | 655 | 664 | 1,794 | \$189 | |
| 30 | TECO Energy | FL | FRCC | ?? | 454 | 538 | 678 | 1,670 | \$224 | 95% |
| 31 | Allegheny Energy | PA | RFC | ?? | 447 | 1,030 | 1,120 | 2,597 | \$673 | |
| 32 | Energy East | ?? | NPCC | ?? | 408 | 496 | 533 | 1,437 | \$125 | |
| 33 | Alliant Energy Corp. | IA | MRO | ?? | 398 | 580 | 1,085 | 2,063 | \$687 | |
| 34 | DPL, Inc. | DE | RFC | ?? | 352 | 355 | 195 | 902 | -\$157 | |
| 35 | Integrys Energy | WI, MI | RFC | ?? | 342 | 539 | 494 | 1,375 | \$152 | |
| 36 | Idacorp | ĺĎ | WECC | No | 225 | 307 | 540 | 1,072 | \$315 | |
| | Totals (\$millions) | | | | \$51,148 | \$62,126 | \$62,722 | \$175,996 | \$11,574 | |
| | Growth | | | | . , - | 21.5% | 1.0% | | | |