



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

Energy: Federal Energy Regulatory Commission Staff White Paper/Guidance Principles for Clean Power Plan Modeling

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The Federal Energy Regulatory Commission ("FERC") staff has issued a *White Paper on Guidance Principles for Clean Power Plan Modeling* ("White Paper"). See Docket No. AD16-14-000.

The FERC is an independent agency that among other things, regulates the interstate transmission of electricity, natural gas and oil.

The *White Paper* references the United States Environmental Protection Agency ("EPA") Clean Air Act Clean Power Plan ("CPP") and notes:

... The CPP limits carbon dioxide emissions from existing fossil fuel-fired electric power plants by providing state specific goals for carbon dioxide emissions from affected electric generating units.

The *White Paper* further notes that EPA considered in the CPP potential impacts on electric system reliability. In addition, EPA, the U.S. Department of Energy ("DOE") and FERC have agreed to coordinate certain activities to help ensure continued reliable electricity generation and transmission during the implementation of the CPP.

While noting the absence of a direct role for the FERC in regards to the CPP, the *White Paper* states that it may be called upon through the EPA-DOE-FERC coordination document to address concerns about reliability as the CPP is implemented. Therefore, the *White Paper* notes:

... the use of appropriate modeling tools and techniques will be helpful to the Commission in carrying out its responsibilities for reliability.

FERC staff identifies the *White Paper* what they deem "four guiding principles" that may assist transmission planning entities, which may include regional transmission organizations, independent system operators, electric utilities, or other interested stakeholders, in conducting effective analysis of the CPP and associated state plans, federal plans or multi-state plans (compliance plans). The guiding principles are stated to address four areas that include:

1. Transparency and stakeholder engagement
2. Study methodology and interactions between studies
3. Study inputs, sensitivities and probabilistic analysis
4. Tools and techniques

The incorporation of these guiding principles in the modeling of the CPP compliance plans is stated to be one way to promote a robust analysis of the reliability impacts of the CPP.

[Click here to download a copy of the *White Paper*.](#)