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# **Air Quality Perspectives on Power Plant Carbon Standards**

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# Issues (1/2)

- Flexibility
  - National standard needed
  - State flexibility in implementation
- Timing
  - Very tight schedule
  - Need to work with many state and fed agencies
- Stringency of the standard
  - Rate or tonnage based? Mixed?
  - Greater than 17% needed from power sector
  - Include carbon capture and storage (CCS)?



# Issues (2/2)

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- Incorporation of energy efficiency and renewable energy (EE and RE)
- National Consistency with evaluation, measurement and verification (EMV) of EE and RE
- Cap and Trade – equivalent to chosen federal standard
- Resources for state and local agencies

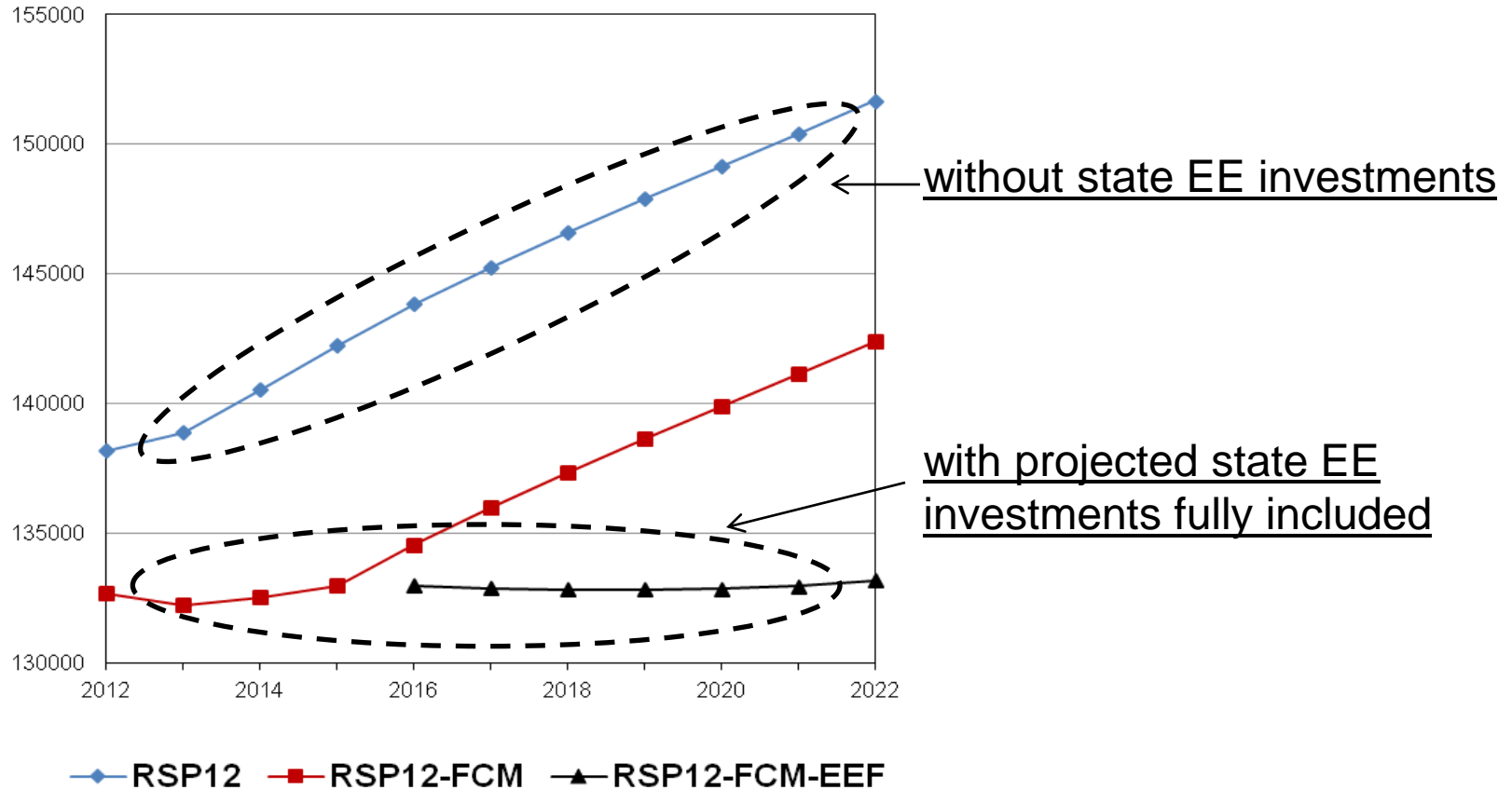
# Consistency

- Ongoing work and progress on EM&V standardization
  - New England, NY, CA, and others
  - DOE, NREL, NEEP, etc.
- Conversion to emissions impacts remains a challenge
  - Lots of options for emission factors (marginal vs. average, etc.)
  - Modeling possible, but resource intensive
  - Some issues differ by pollutant (e.g., high electric demand days during ozone season)
- Consistency and Transparency key for SIPs, 111(d)
  - EPA/DOE must ensure “ton is a ton” for EE
  - EPA’s Roadmap project - good first step
- Coordination within states necessary too



# ISO-NE Load Forecast

New England: Annual Energy (GWh)



# Conclusion

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- Complicated issues to resolve – many views
- EPA working hard to incorporate input via “listening sessions” – see questions to stakeholders
- Time is short, lots of people to involve
- EE and RE can play a very important role
- Standards are needed to address climate change

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# Questions/Comments?

## Thank you!

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# ISO-NE Energy Efficiency Forecast

- New England states have strong Energy Efficiency (EE) programs
  - Legislation (e.g., MA Green Communities Act)
  - Support from advocates and utilities
  - Rigorous Evaluation, Measurement & Verification (EM&V)
- ISO-NE Forward Capacity Market (FCM)
  - Extends 3 years
  - includes EE (“negawatts”)
- Until 2012: Load forecasts only included FCM EE
  - EE not included beyond 3-year FCM horizon
  - EE now included for years 3 – 10 in annual forecast