



Indiana Michigan Power Company

# INDIANA IRP STAKEHOLDER MEETING #4

March 5, 2025



An **AEP** Company

# Welcome & Introductions

## I&M Leadership Team

David Lucas | Vice President, Regulatory and Finance

Andrew Williamson | Director, Regulatory Services

Ed Locigno | Regulatory Analysis & Case Manager

Regiana Sistevaris | Manager, Regulatory Services

Jon Walter | Regulatory Innovations Manager

Austin DeNeff | Regulatory Consultant Senior

## 1898 & Co.

Brian Despard | Senior Project Manager

## I&M Load Forecasting

Trenton Feasel | Manager, Economic Forecasting

## I&M Resource Planning

Kayla Zellers | Director, Resource Planning

Mohamed Abukaram | Director, Resource Planning

Mark Sklar-Chik | Staff Analyst, Resource Planning

## I&M Infrastructure Development

Tim Gaul | Director, Regulated Infrastructure Development

Justin Dehan | Manager, Regulated Infrastructure Development

# Agenda

Time (EST)	Agenda Topic	Lead
1:00-1:05	<u>Welcome &amp; Introductions</u>	Andrew Williamson Kayla Zellers Brian Despard
1:05-1:15	<u>IRP Framework and Journey to Preferred Portfolio</u>	Kayla Zellers
1:15-1:30	<u>Candidate Portfolio Review</u>	Kayla Zellers
1:30-1:45	<u>Risk Analysis</u>	Mohamed Abukaram
1:45-2:00	<u>Preferred Portfolio</u>	Andrew Williamson
2:00-2:15	<u>Results Comparison and Portfolio Performance Indicators</u>	Kayla Zellers Mohamed Abukaram
2:15-2:30	<u>Short-Term Action Plan</u>	Andrew Williamson
2:30-3:00	<u>Open Discussion</u> • Feedback From Stakeholders	Andrew Williamson

# Participation

Participants joining today's meeting will be in a "listen-only" mode. Please use the "Raise" function to be recognized and unmuted.

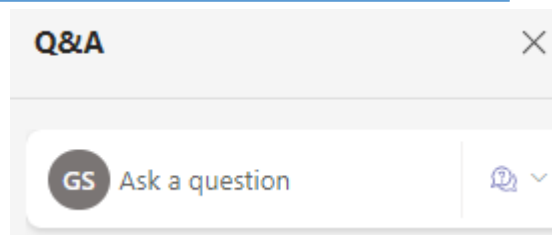
During the presentation, please enter questions at any time into the Teams Q&A feature. Questions will be addressed after each section. At the end of the presentation, we will open up the floor for additional questions, thoughts, ideas, and suggestions.

All questions and answers will be logged and provided on the IRP website. Any questions not answered during the meeting will be answered after the meeting and provided in the Q&A log posted to the IRP website.

Questions, thoughts, ideas, and suggestion related to Stakeholder Meeting 4 can be provided to [I&MIRP@aep.com](mailto:I&MIRP@aep.com) following this meeting.



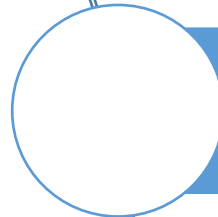
Click the Q&A feature at the top of the Teams screen



# Guidelines



Please focus questions, thoughts, ideas, and suggestions to the IRP process and the content being discussed in this meeting. Time will be taken during this meeting to respond to questions.



Please respect other participants and their views by not addressing other participants directly and not commenting on the views expressed by others.



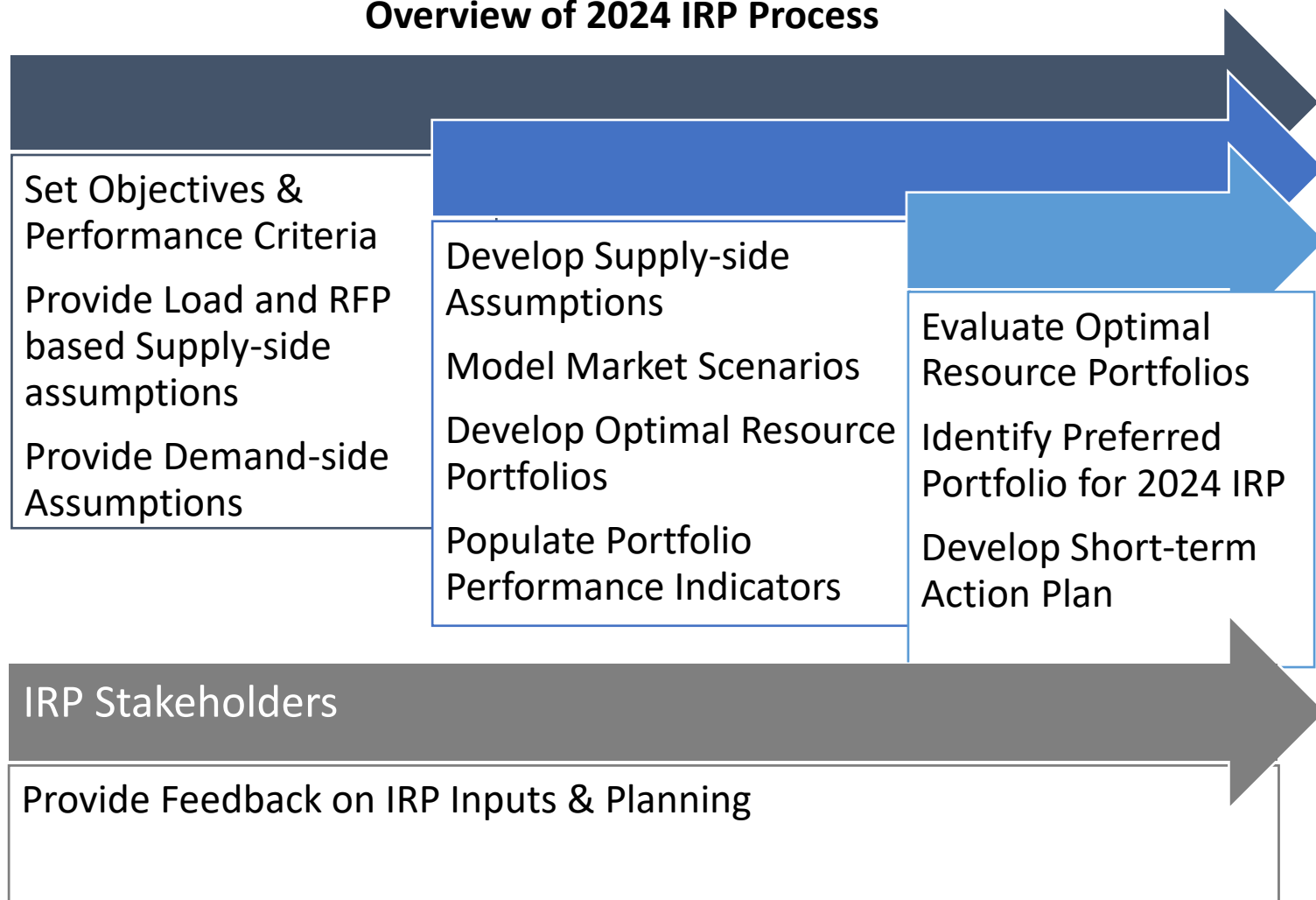
This meeting will not be recorded or transcribed.



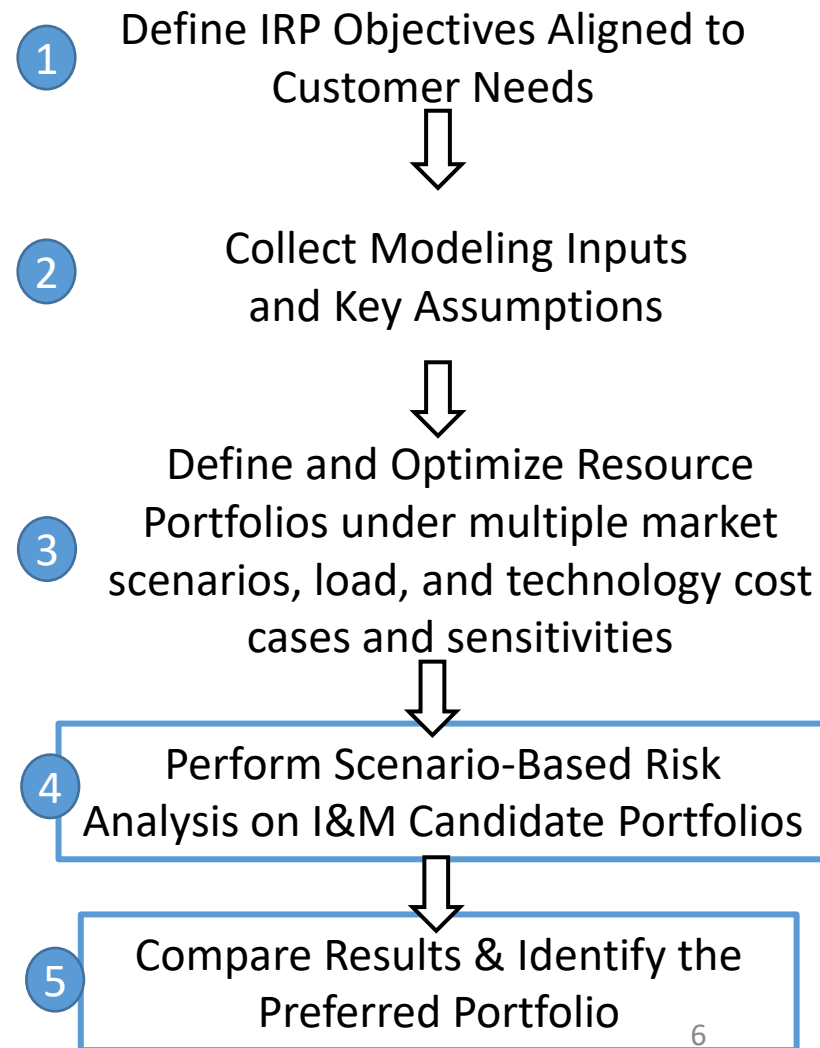
Any further questions or comments can be provided to [I&MIRP@aep.com](mailto:I&MIRP@aep.com).

# 2024 IRP Process

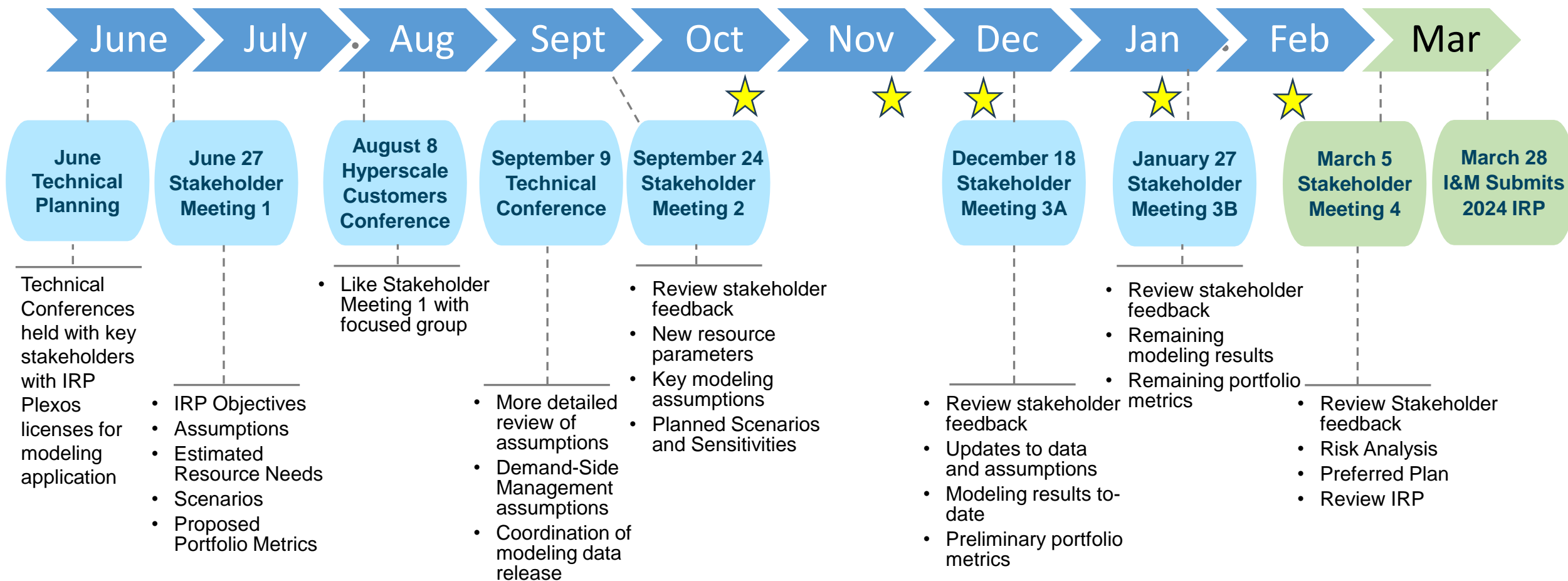
## Overview of 2024 IRP Process



## 2024 IRP Analysis Steps

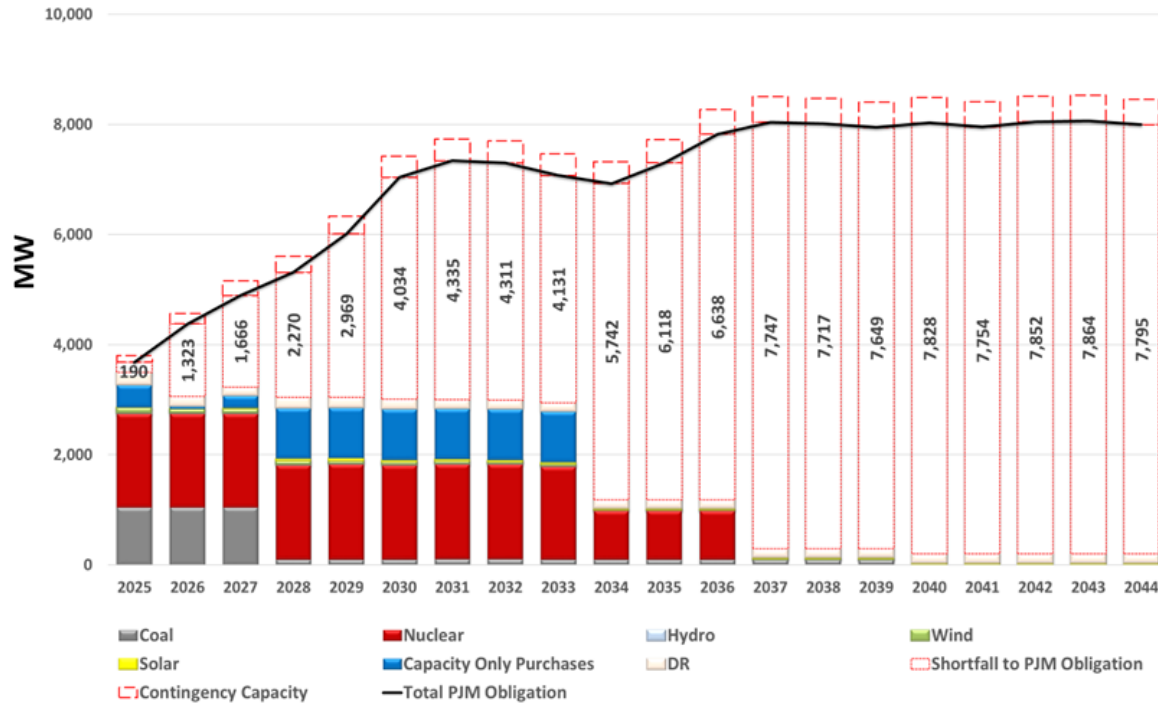


# Stakeholder Engagement Timeline

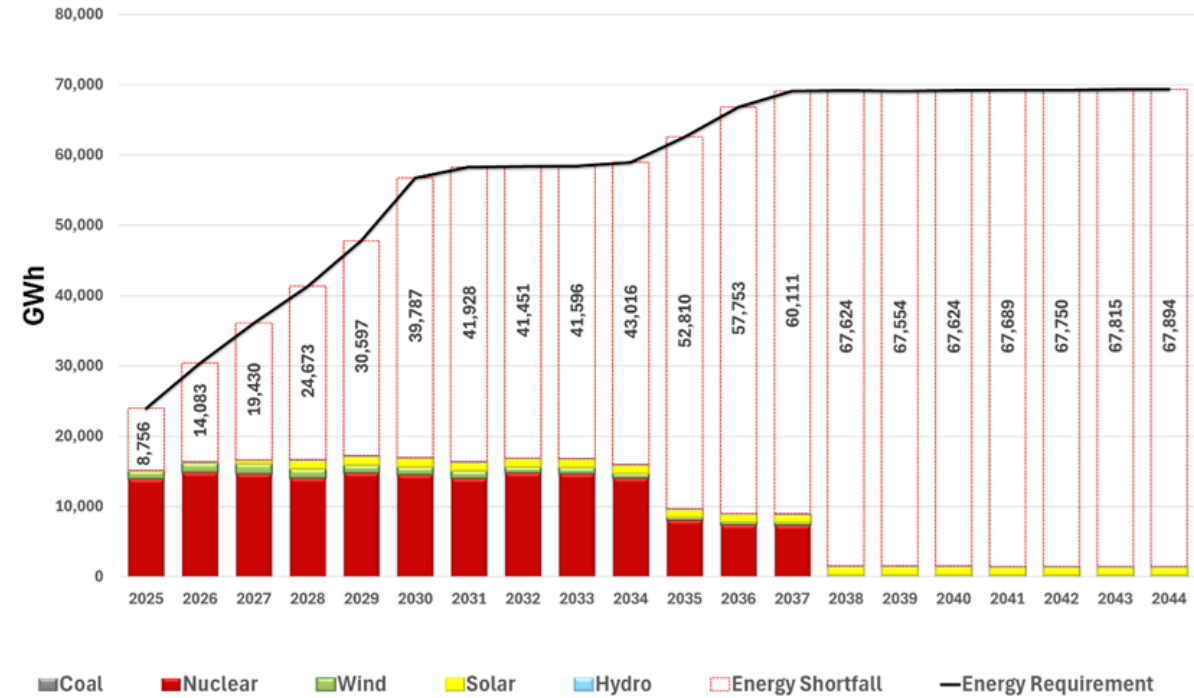


# Capacity and Energy Needs Assessment

Going-In Capacity Position  
(Accredited Capacity)



Going-In Energy Position





# Portfolios Modeled

Scenario	Stakeholder Meeting 3A or 3B
Base Reference	3A
High Economic Growth	3A
Low Economic Growth	3A
Enhanced Environmental Regulations (EER)	3A

Sensitivities	Stakeholder Meeting 3A or 3B
Base under EPA Section 111(b)(d) Requirements	3A
Low Carbon: Transition to Objective	3A
Low Carbon: Expanded Build Limits	3A
Base with High IN Load	3B
Base with Low IN Load	3B
Rockport Unit 1 Retires 2025	3B
Rockport Unit 1 Retires 2026	3B
Exit OVEC ICPA in 2030	3B
High Technology Cost	3B
Expanded Wind Availability (Base)	3B
Expanded Wind Availability (EER)	3B

# Candidate Portfolio Selection

Pillar	Affordability			Reliability			Reliability/	Grid Stability	Environmental Sustainability		
							Resiliency	Resiliency			
Performance Indicators and Metrics	Short Term 7-yr Rate CAGR Power Supply \$/MWh	Long Term Supply Portfolio NPVRR Power Supply Costs	Portfolio Resilience: High Minus Low Scenario Range, Portfolio NPVRR	Energy Market Risk Purchases	Energy Market Risk Sales	Planning Reserves % Reserve Margin	Resource Diversity	Fleet Resiliency: Dispatchable Capacity	Emissions Analysis: % Change from 2005 Baseline		
Year Ref.	2024-2031	2025-2044	2025-2044	10 years   20 years	10 years   20 years	10 years   20 years	10 years   20 years	10 years   20 years	2034   2044		
Units	%	\$B	\$B	NPV of Market Purchases & MWhs % of Total Demand	NPV of Market Sales & MWhs % of Total Demand	Average of Annual PRM %	Portfolio Index Percent Change from 2025	Dispatchable Nameplate MW/ % of Company Peak Demand	% Change CO <sub>2</sub>	% Change NOx	% Change SO <sub>2</sub>
Base Reference	-0.5%	\$32.0	[to be developed]	10 Years: \$2.6B (27%) 20 Years: \$4.3B (22%)	10 Years: \$0.0B (0.1%) 20 Years: \$0.1B (0.3%)	10 Years: -0.7% 20 Years: -3.4%	Capacity: 31%   19% Energy: 173%   139%	10 Years: 90% 20 Years: 97%	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%
Low Carbon: Transition	1.3%	\$39.9	[to be developed]	10 Years: \$2.7B (27%) 20 Years: \$4.1B (20%)	10 Years: \$0.2B (1.6%) 20 Years: \$1.7B (7.7%)	10 Years: 2.0% 20 Years: 0.5%	Capacity: 53%   54% Energy: 302%   304%	10 Years: 91% 20 Years: 95%	2034: -65% 2044: -65%	2034: -96% 2044: -96%	2034: -100% 2044: -100%
Expanded Wind Availability (EER)	0.5%	\$32.8	[to be developed]	10 Years: \$3.1B (31%) 20 Years: \$5.4B (27%)	10 Years: \$0.5B (3.5%) 20 Years: \$1.3B (5.2%)	10 Years: 5.1% 20 Years: -0.6%	Capacity: 31%   34% Energy: 296%   318%	10 Years: 92% 20 Years: 92%	2034: -56% 2044: -55%	2034: -95% 2044: -95%	2034: -100% 2044: -100%

## Base Reference

Functions as comparison point  
for other Candidate Portfolios

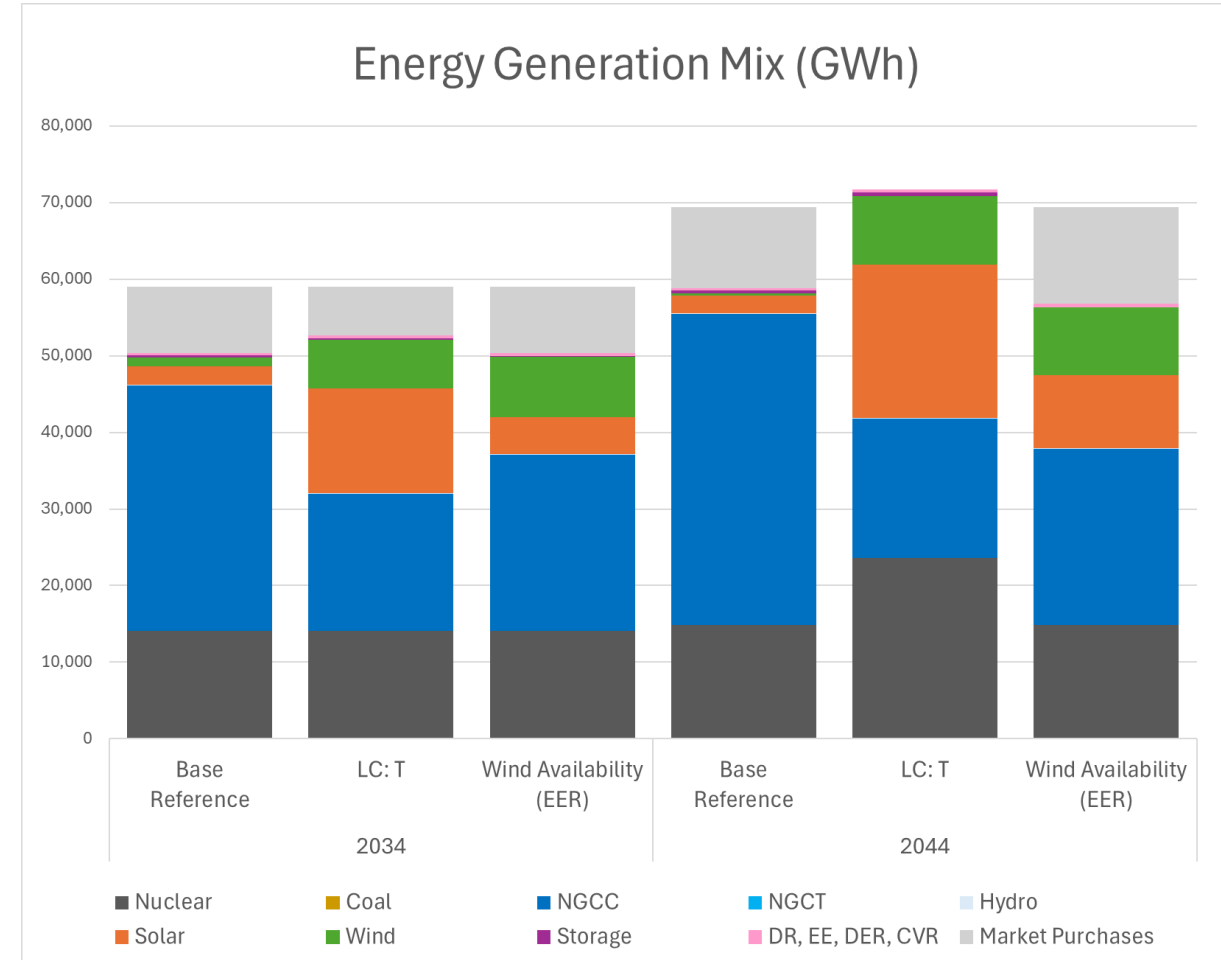
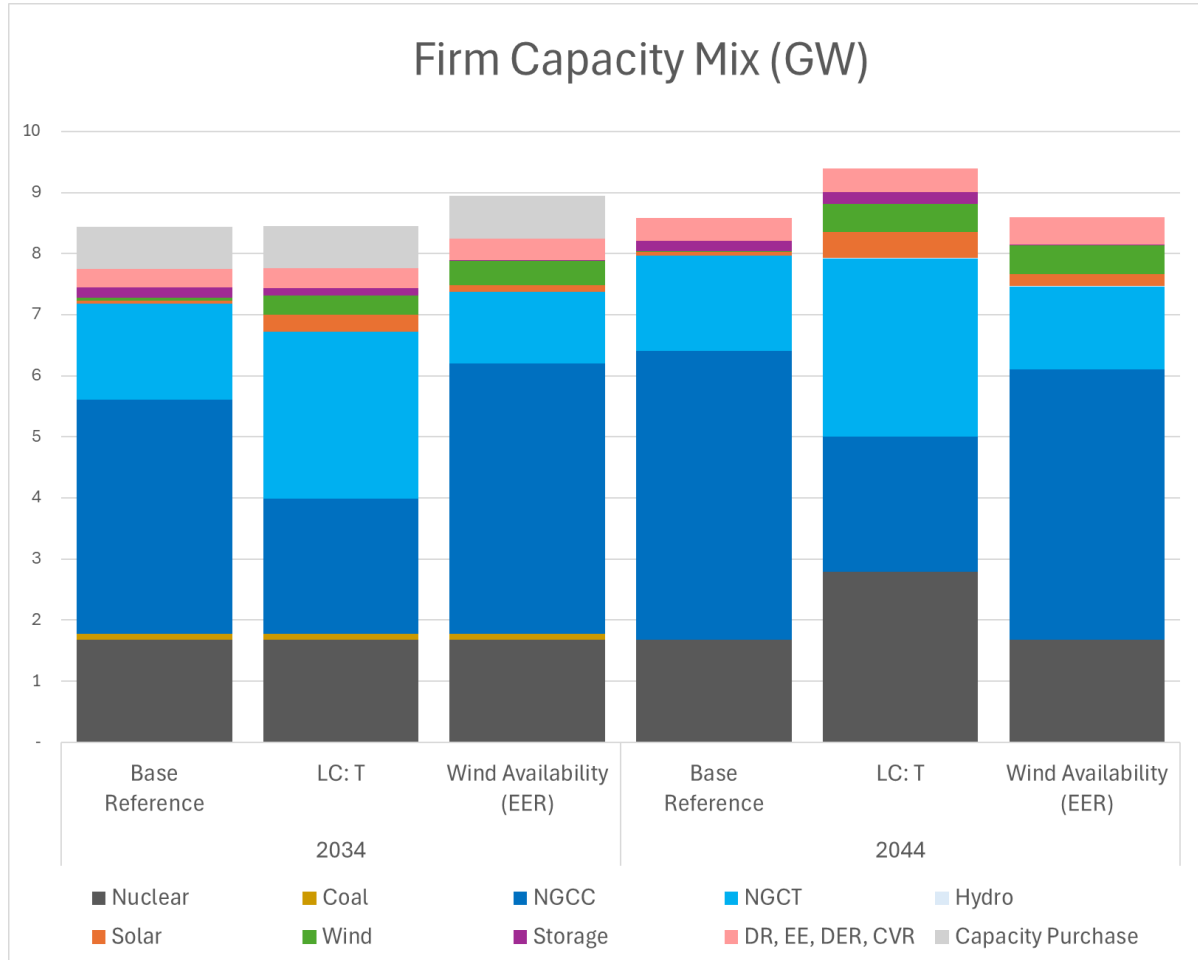
## Low Carbon: Transition

Resource Diversity ✓  
Environmental Sustainability ✓

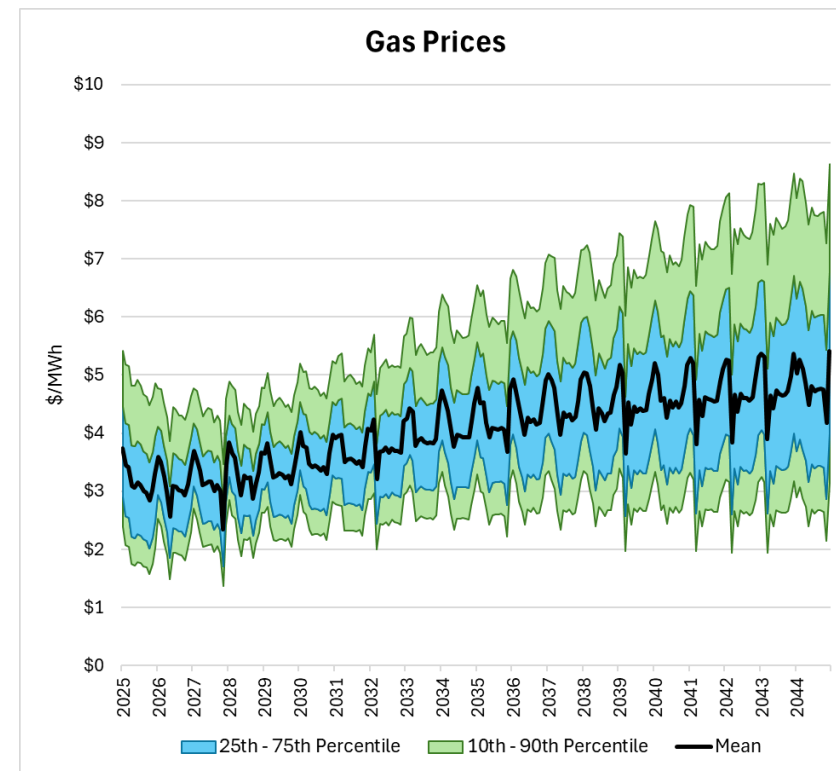
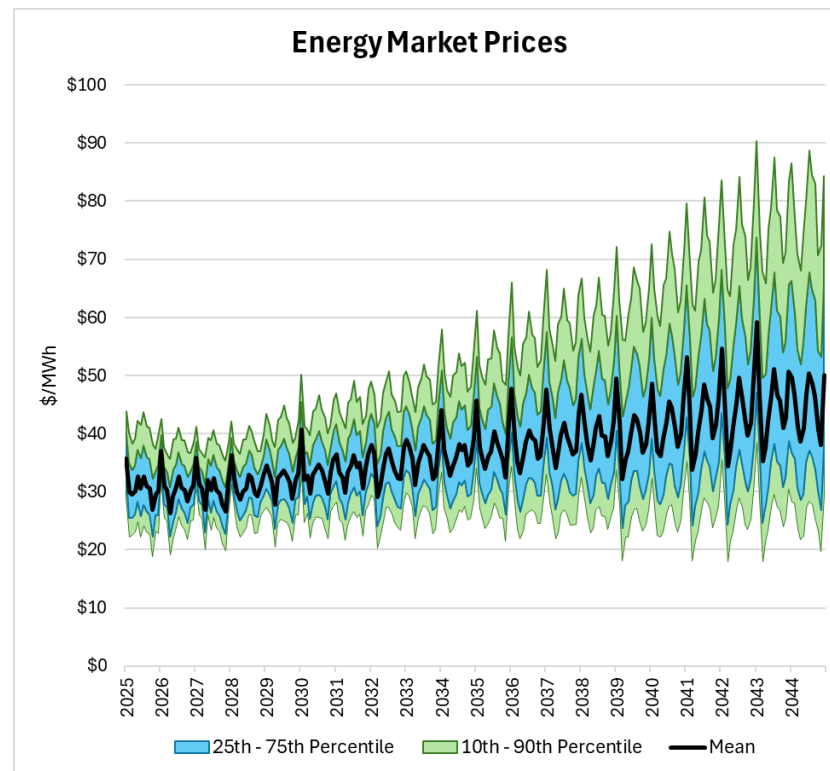
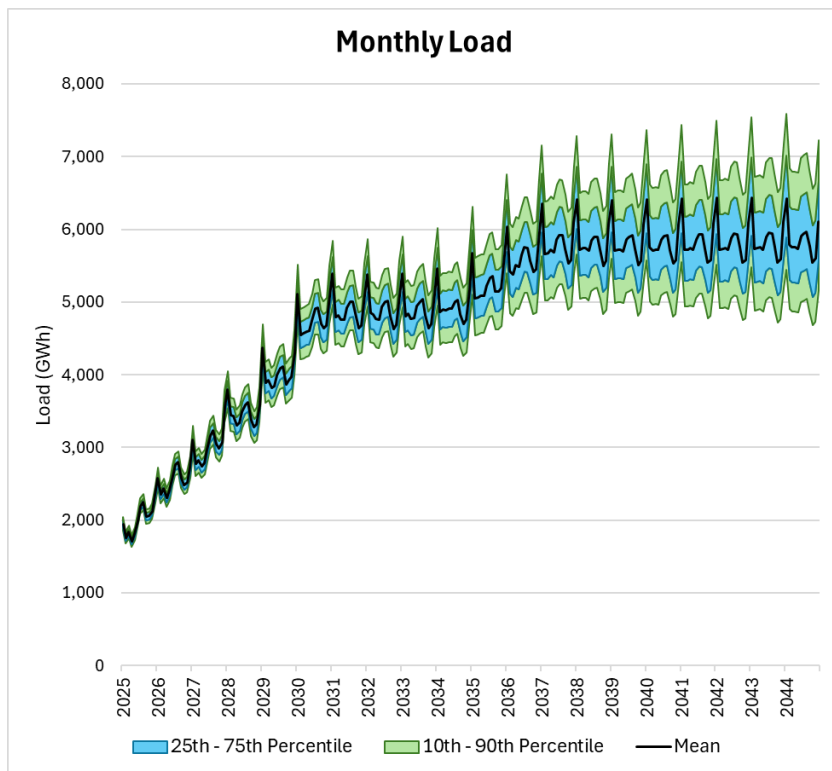
## Expanded Wind Availability (EER)

Affordability ✓  
Resource Diversity ✓  
Environmental Sustainability ✓

# Candidate Portfolio Comparison



# Risk Analysis Method and Assumptions



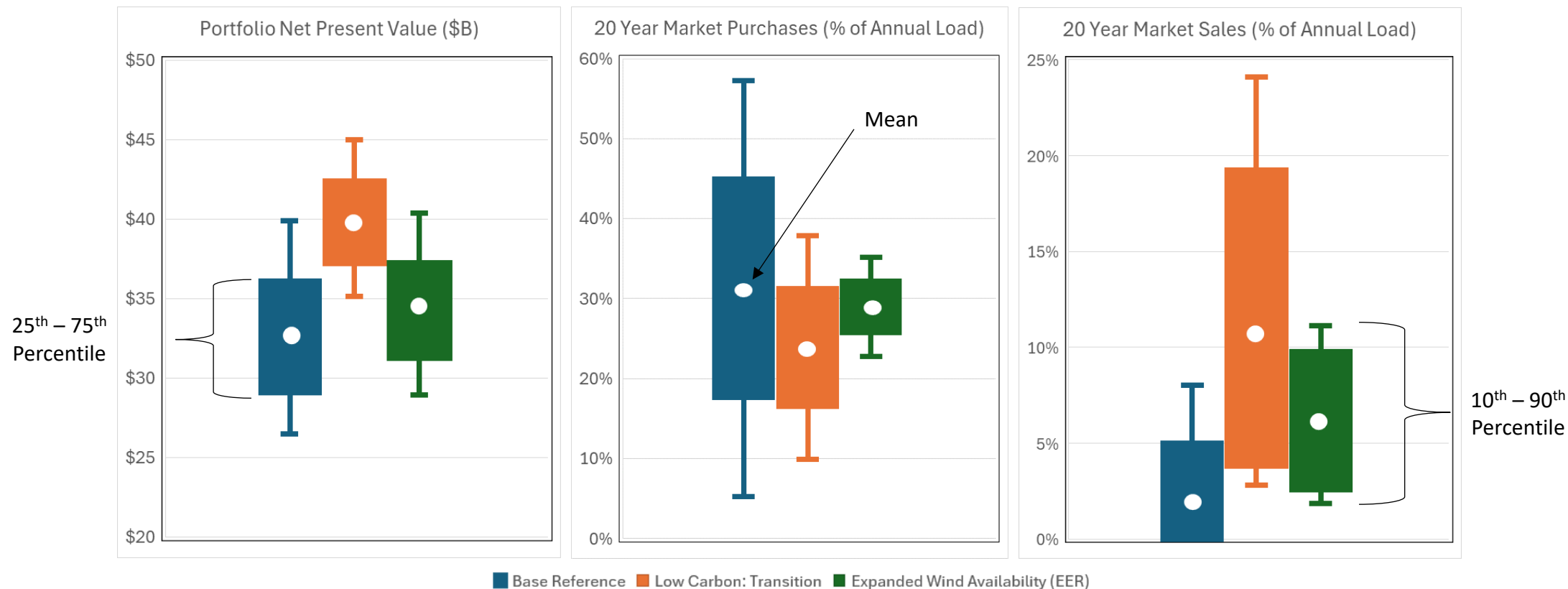
## Methodology:

- Introduced uncertainty through Monte Carlo simulation with 100 correlated samples for load, market prices, and gas prices.
- Applied appropriate probability distributions and covariance structures to capture uncertainties and interdependencies among load, market prices, and gas prices.

## Observations

- Monthly load and market price uncertainty increases significantly in the later half of the planning horizon.
- Gas prices exhibit moderate growth with periodic fluctuations. However, uncertainty increases after 2035, reflecting greater price unpredictability in the long term.

# Risk Analysis Results



Expanded Wind Availability (EER) and Base Reference case have similar variability. The Low Carbon: Transition case has the least amount of variability but highest average net present value.

Expanded Wind Availability (EER) has the lowest variability due to the gas capacity factor assumption which restricts gas generation during favorable economic conditions.

Low Carbon: Transition has the highest variability due to higher amounts of renewable resources and unrestricted gas capacity factors.

# Preferred Portfolio Development

- Based on modifications to the Expanded Wind Availability Enhanced Environmental Regulations (EER) portfolio
- Supports a balanced consideration of Indiana's Five Pillars of energy policy
  - Positions I&M for compliance with existing and future GHG regulations based on current and proposed rules
  - Leverages a mix of resource types to support reliability and stability, while increasing resource diversity and expanding I&M's renewable and clean energy portfolio
- Reflects up to date market conditions and resource availability based on 2024 RFP
- Includes strategy to leverage cost savings opportunities associated with redevelopment of the Rockport site to include combustion turbines and SMR technologies
  - Rockport CTs reflect estimated cost reductions of ~15% associated with reuse of interconnect and existing facilities while leveraging favorable equipment pricing associated with AEP multi-unit supply chain opportunities
  - Rockport SMRs reflect estimated cost reductions of ~30% associated with reuse of interconnect and existing facilities, energy community bonus ITCs, federal grants, customer participation, and leveraging fast follower savings opportunities
- Selects Cook Subsequent License Renewal maintaining Cook as a foundation of I&M's future generation portfolio

# Preferred Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT*	Existing CT	Nuclear**	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	0	325
2026	0	0	0	0	0	0	0	0	33	1,500
2027	0	0	0	0	0	0	0	0	61	1,875
2028	1,000	599	50	0	1,800	0	1,000	0	92	0
2029	1,000	596	50	0	2,700	0	1,000	0	116	0
2030	1,000	593	50	0	3,600	690	1,000	0	132	0
2031	1,400	590	50	0	4,500	690	1,500	0	148	0
2032	1,800	886	50	0	4,500	690	1,500	0	144	0
2033	2,200	1,480	50	0	4,500	690	1,500	0	138	0
2034	2,600	2,071	50	0	4,500	690	1,500	0	134	0
2035	3,000	2,210	50	0	4,500	690	1,500	888	134	0
2036	3,200	2,199	50	0	4,500	690	1,500	1,188	131	0
2037	3,600	2,636	50	0	4,500	690	1,500	1,488	128	0
2038	4,000	2,623	50	0	4,500	690	1,500	2,480	125	0
2039	4,000	2,609	50	0	4,500	690	1,500	2,480	122	0
2040	4,000	2,596	50	0	4,500	690	1,500	2,480	119	0
2041	4,000	2,582	50	0	4,500	690	1,500	2,480	111	0
2042	4,000	2,569	50	0	4,500	690	1,500	2,480	105	0
2043	3,000	2,555	50	0	4,500	690	1,500	2,480	99	0
2044	3,000	2,542	50	0	4,500	690	1,500	2,480	94	0

## Observations:

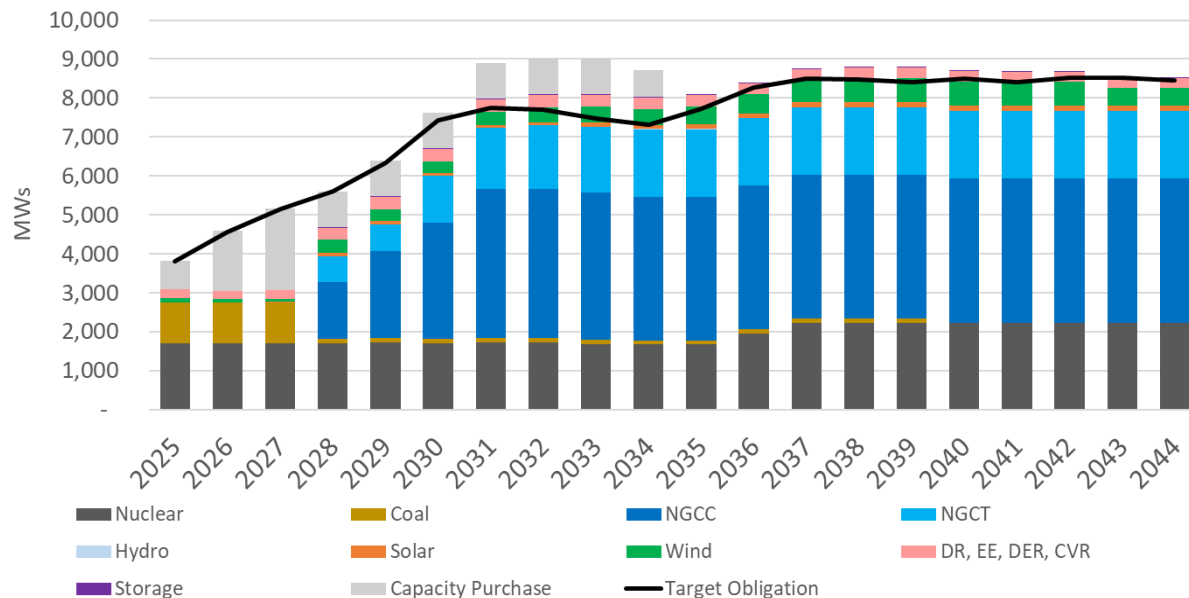
- Diverse mix of wind, solar, storage, existing CC's and CT's are selected in the first year available to meet the capacity and energy obligation
- Substantial wind, solar, existing CC's, and existing CT's selected over the planning horizon
- Cook SLR selected in 2035 and 2038
- Leverages Rockport redevelopment opportunities with new CT selected in 2030 and 300 MW of SMR's selected in both 2036 and 2037. These resources reduce the need for existing CC's compared to the Expanded Wind Availability (EER) portfolio, adding new capacity to PJM's and I&M's system
- Elkhart and Mottville Hydro relicensing selected in 2030 and 2033, respectively

\*The 690 MW New CTs selected in 2030 are assumed to be located at the Rockport site

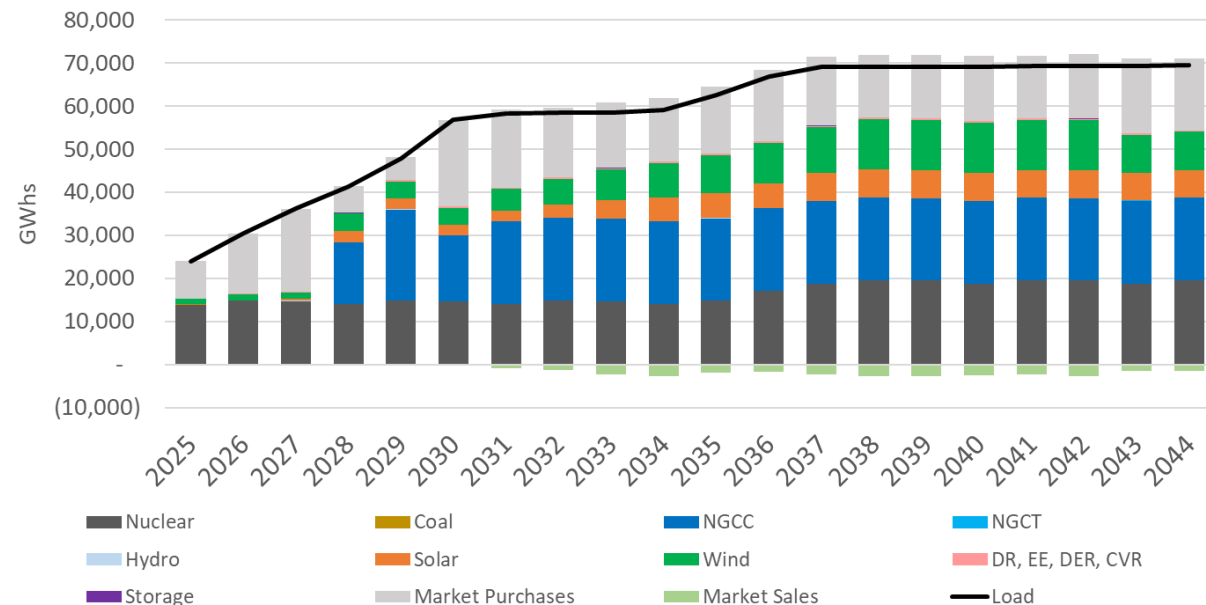
\*\* Nuclear includes Cook SLR and SMRs. SMRs are assumed to be located at the Rockport site

# Preferred Portfolio

Preferred Portfolio Firm Capacity



Preferred Portfolio Energy Supply



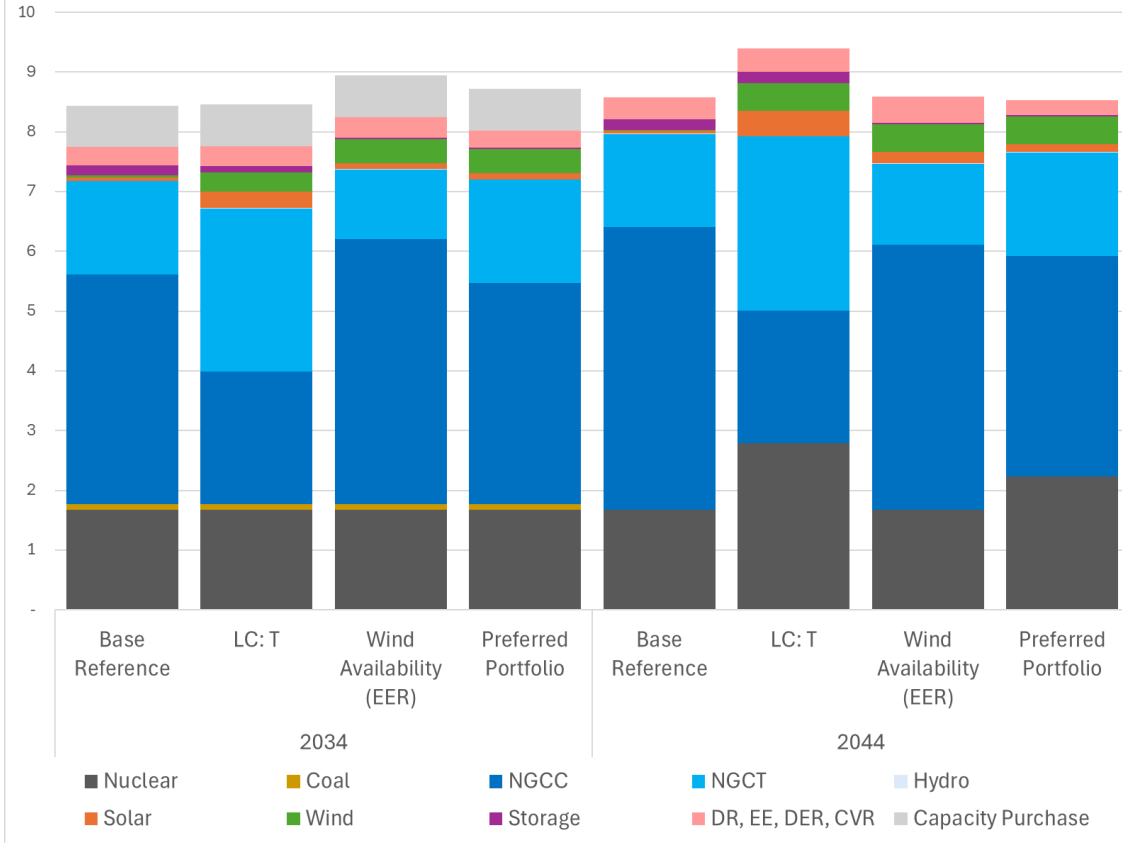
## Observations:

- Expands I&M's wind and solar capacity and energy supply
- Rockport CT's, SMR's, Cook, and other natural gas resources with higher accreditation values support most of I&M's capacity obligation
- Capacity factor limitations associated with EPA Section 111(b)(d) compliance begin in 2030 and result in more energy contributions from other resources
- Capacity additions in 2031-2034 built to provide necessary energy supply and prepare for load increases that occur from 2034-2037
- Renewable resource additions result in higher market energy sales starting in 2031

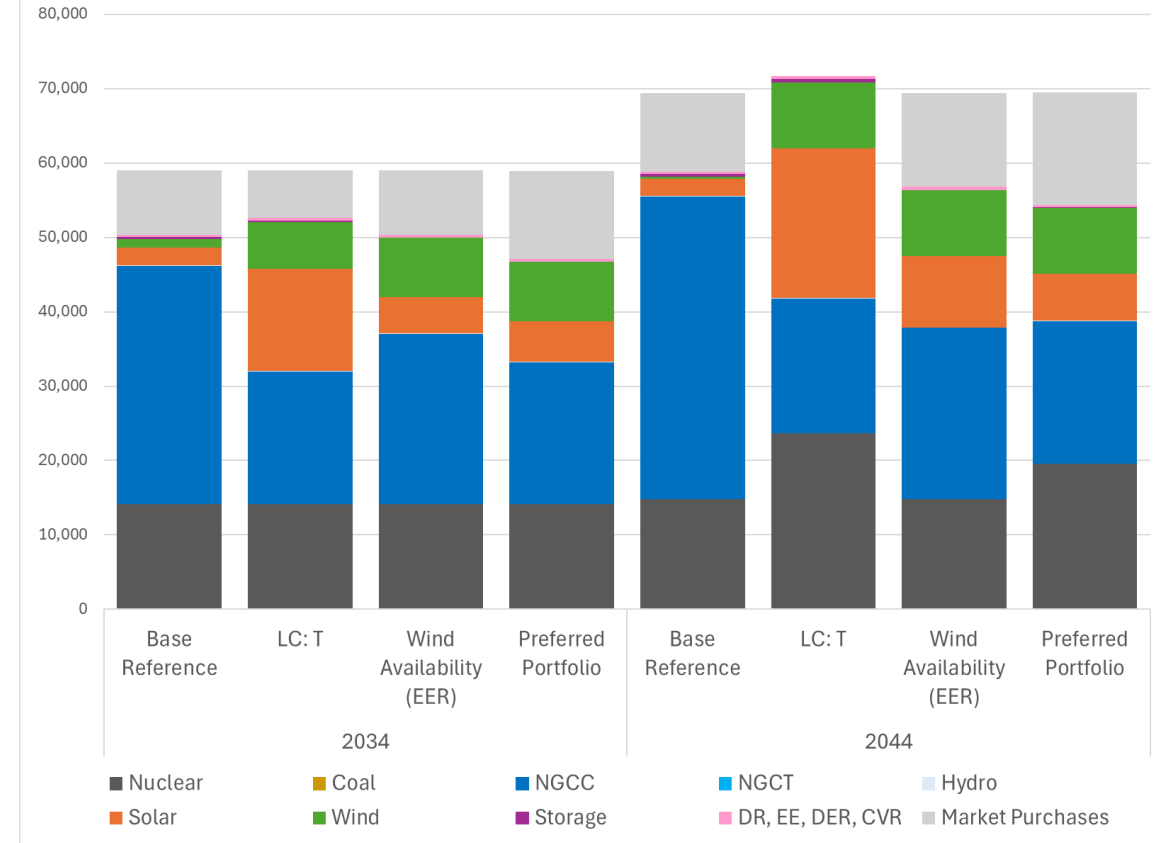


# Results Summary Comparison

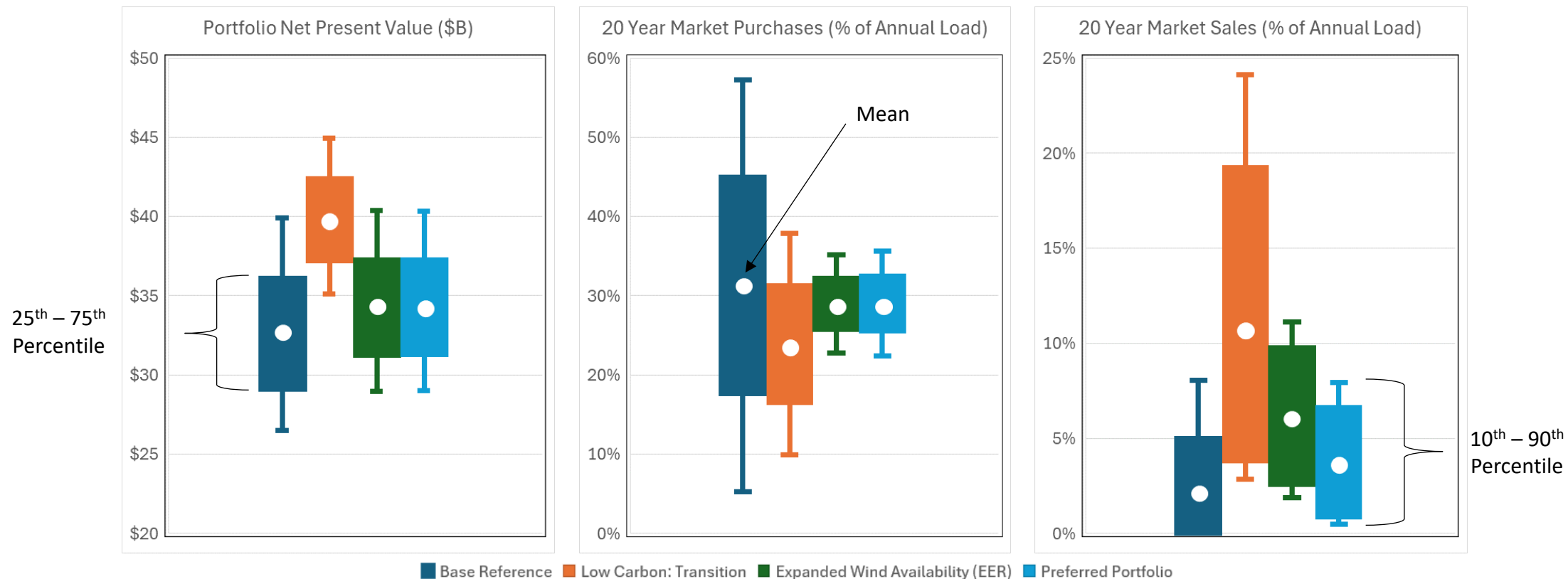
## Firm Capacity Mix (GW)



## Energy Generation Mix (GWh)



# Preferred Portfolio Risk Analysis Results



Preferred Portfolio variability for net present value is similar to the Expanded Wind Availability (EER) but slightly less. The Preferred Portfolio has less variability in market sales risk and lower average market sales compared to the Expanded Wind Availability (EER).

# Portfolio Performance Indicators

Pillar	Affordability			Environmental Sustainability		
<b>Performance Indicators and Metrics</b>	<b>Short Term</b> 7-yr Rate CAGR Power Supply \$/MWh	<b>Long Term</b> Supply Portfolio NPVRR Power Supply Costs	<b>Portfolio Resilience:</b> High Minus Low Scenario Range, Portfolio NPVRR	<b>Emissions Analysis:</b> % Change from 2005 Baseline		
Year Ref.	2024-2031	2025-2044	2025-2044	2034   2044		
Units	%	\$B	\$B	% Change CO <sub>2</sub>	% Change NOx	% Change SO <sub>2</sub>
<b>Base Reference</b>	-0.5%	\$32.0	\$13.4	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%
<b>Low Carbon: Transition</b>	1.3%	\$39.9	\$9.8	2034: -65% 2044: -65%	2034: -96% 2044: -96%	2034: -100% 2044: -100%
<b>Expanded Wind Availability (EER)</b>	0.5%	\$32.8	\$11.4	2034: -56% 2044: -55%	2034: -95% 2044: -95%	2034: -100% 2044: -100%
<b>Preferred Portfolio</b>	0.4%	\$33.1	\$11.4	2034: -63% 2044: -63%	2034: -96% 2044: -96%	2034: -100% 2044: -100%

# Portfolio Performance Indicators

Pillar	Reliability			Reliability/ Resiliency	Grid Stability
				Resiliency	Resiliency
<i>Performance Indicators and Metrics</i>	<i>Energy Market Risk Purchases</i>	<i>Energy Market Risk Sales</i>	<i>Planning Reserves % Reserve Margin</i>	<i>Resource Diversity</i>	<i>Fleet Resiliency: Dispatchable Capacity</i>
Year Ref.	10 years   20 years	10 years   20 years	10 years   20 years	10 years   20 years	10 years   20 years
Units	NPV of Market Purchases & MWs % of Total Demand	NPV of Market Sales & MWs % of Total Demand	Average of Annual PRM %	Portfolio Index Percent Change from 2025	Dispatchable Nameplate MW/ % of Company Peak Demand
<b>Base Reference</b>	10 Years: \$2.6B (27%) 20 Years: \$4.3B (22%)	10 Years: \$0.0B (0.1%) 20 Years: \$0.1B (0.3%)	10 Years: -0.7% 20 Years: -3.4%	Capacity: 31%   19% Energy: 173%   139%	10 Years: 90% 20 Years: 97%
<b>Low Carbon: Transition</b>	10 Years: \$2.7B (27%) 20 Years: \$4.1B (20%)	10 Years: \$0.2B (1.6%) 20 Years: \$1.7B (7.7%)	10 Years: 2.0% 20 Years: 0.5%	Capacity: 53%   54% Energy: 302%   304%	10 Years: 91% 20 Years: 95%
<b>Expanded Wind Availability (EER)</b>	10 Years: \$3.1B (31%) 20 Years: \$5.4B (27%)	10 Years: \$0.5B (3.5%) 20 Years: \$1.3B (5.2%)	10 Years: 5.1% 20 Years: -0.6%	Capacity: 31%   34% Energy: 296%   318%	10 Years: 92% 20 Years: 92%
<b>Preferred Portfolio</b>	10 Years: \$3.1B (31%) 20 Years: \$5.3B (27%)	10 Years: \$0.2B (1.3%) 20 Years: \$0.5B (2.3%)	10 Years: 4.2% 20 Years: -0.6%	Capacity: 39%   35% Energy: 299%   299%	10 Years: 91% 20 Years: 93%

# Short Term Action Plan

DSM Programs	Continue the planning and regulatory actions necessary to implement additional cost-effective DSM programs in Indiana consistent with this IRP that identified the potential for increased levels of cost-effective EE.
Near Term Capacity Needs	Obtain the capacity needed for PJM Planning Years 2026/2027 through 2027/2028 through Short Term market and bilateral purchases.
2024 RFP	Complete selection of resources from the 2024 RFP. Seek approval of resources consistent with the Preferred Portfolio mix of resources.
Rockport CT	Complete competitive procurement process, seek reuse of transmission interconnection and request approval of resource with the commission.
Rockport SMR	Initiate early site permit process and continue to evaluate and pursue project development options.
Future RFPs	Continue to evaluate the need to issue future generation RFPs to fill the capacity and energy needs, as necessary.
Cook SLR	Take the appropriate steps to implement the Cook subsequent license renewal, as supported by the IRP modeling results and Preferred Portfolio.
Hydro Relicensing	Take the appropriate steps to finalize the evaluation of the Elkhart and Mottville Hydro operating license renewal opportunity reflected in the Preferred Portfolio.
Adjust for the Future	Adjust this action plan and future IRPs to reflect changing circumstances, as necessary.

# Closing Remarks and Discussion



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# Portfolio Resource Plans

## Appendix

# Base Reference Case Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	28	1,500
2027	0	0	0	0	0	0	0	0	59	1,875
2028	200	599	450	0	1,800	0	1,000	0	94	0
2029	200	596	450	0	2,700	0	1,000	0	100	0
2030	200	593	450	0	3,600	0	1,500	0	97	0
2031	200	590	450	0	3,600	0	2,000	0	96	0
2032	200	587	450	0	3,600	0	2,000	0	115	0
2033	200	584	450	0	3,600	0	2,000	0	131	0
2034	200	581	450	1,030	3,600	0	2,000	0	144	0
2035	200	578	450	1,030	3,600	0	2,000	888	156	0
2036	200	575	450	2,060	3,600	0	2,000	888	169	0
2037	200	572	450	2,060	3,600	0	2,000	888	177	0
2038	200	569	450	2,060	3,600	0	2,000	1,880	185	0
2039	200	566	450	2,060	3,600	0	2,000	1,880	193	0
2040	200	563	450	2,060	3,600	0	2,000	1,880	201	0
2041	200	560	450	2,060	3,600	0	2,000	1,880	206	0
2042	200	557	450	2,060	3,600	0	2,000	1,880	211	0
2043	0	554	450	2,060	3,600	0	2,000	1,880	213	0
2044	0	551	450	2,060	3,600	0	2,000	1,880	220	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering all base modeling parameters and assumptions; establishes the point of reference for other scenarios and sensitivities

## Observations through 2030:

- Short Term Capacity purchases until new resources become available in 2028
- Solar, wind, storage, and gas resources selected in 2028 in response to load growth by 2030
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation
- DR, EE, DER, CVR increase as the load and energy increase with the HSL

## Observations for 2031+:

- New CC built in 2034 and 2036 to meet the load growth in the same period and the expiration of existing capacity purchase agreements
- Cook SLR selected in 2035 and 2038



# Enhanced Environmental Regulations Case Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	26	1,500
2027	0	0	0	0	0	0	0	0	56	1,875
2028	200	1,496	350	0	1,800	0	1,000	0	88	0
2029	200	1,489	350	0	2,700	0	1,000	0	112	0
2030	200	1,481	350	0	3,600	0	1,500	0	127	0
2031	600	1,474	350	0	5,400	0	1,500	0	142	0
2032	1,000	2,065	350	0	5,400	0	1,500	0	158	0
2033	1,400	2,653	350	0	5,400	0	1,500	0	169	0
2034	1,800	3,238	350	0	5,400	0	1,500	0	178	0
2035	2,200	3,371	350	0	5,400	0	1,500	888	190	0
2036	2,600	3,952	350	0	5,400	0	1,500	888	201	0
2037	3,000	4,530	350	0	5,400	0	1,500	888	208	0
2038	3,200	4,507	350	0	5,400	0	1,500	1,880	215	0
2039	3,200	4,484	350	0	5,400	0	1,500	1,880	220	0
2040	3,200	4,461	350	0	5,400	0	1,500	1,880	224	0
2041	3,200	4,437	350	0	5,400	0	1,500	1,880	227	0
2042	3,200	4,414	350	0	5,400	230	1,500	1,880	230	0
2043	3,000	4,114	350	0	5,400	230	1,500	1,880	232	0
2044	3,000	4,092	350	0	5,400	230	1,500	1,880	233	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering implementation of EPA Section 111(b)(d) greenhouse gas rules and associated market commodity price impacts

## Observations through 2030:

- Solar, wind, storage, and gas resources selected in 2028 in response to load growth by 2030
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation
- Additional solar resources selected due to limited capacity factors on thermal resources
- DR, EE, DER, CVR increase as the load and energy increase with the HSL

## Observations for 2031+:

- Substantially more wind and solar selected than reference scenario
- Additional existing CC's selected to meet the load growth in the same period and the expiration of existing capacity purchase agreements
- Cook SLR selected in 2035 and 2038
- Additional EE selected compared to reference scenario

# Base Under EPA Section 111(b)(d) Sensitivity

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	27	1,500
2027	0	0	0	0	0	0	0	0	57	1,875
2028	200	1,047	400	0	1,800	0	1,000	0	90	0
2029	200	1,042	400	0	2,700	0	1,000	0	114	0
2030	200	1,037	400	0	3,600	0	1,500	0	130	0
2031	600	1,481	400	0	5,400	0	1,500	0	146	0
2032	1,000	2,072	400	0	5,400	0	1,500	0	162	0
2033	1,400	2,660	400	0	5,400	0	1,500	0	173	0
2034	1,800	3,245	400	0	5,400	0	1,500	0	182	0
2035	2,200	3,527	400	0	5,400	0	1,500	888	194	0
2036	2,600	4,108	400	0	5,400	0	1,500	888	204	0
2037	3,000	4,685	400	0	5,400	0	1,500	888	212	0
2038	3,000	4,661	400	0	5,400	0	1,500	1,880	218	0
2039	3,000	4,637	400	0	5,400	0	1,500	1,880	223	0
2040	3,000	4,613	400	0	5,400	0	1,500	1,880	228	0
2041	3,000	4,589	400	0	5,400	0	1,500	1,880	231	0
2042	3,000	4,565	400	0	5,400	230	1,500	1,880	233	0
2043	2,800	4,541	400	0	5,400	230	1,500	1,880	235	0
2044	2,800	4,517	400	0	5,400	230	1,500	1,880	236	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering implementation of EPA Section 111(b)(d) greenhouse gas rules and base modeling parameters and assumptions

## Observations through 2030:

- Solar, wind, storage, and gas resources selected in 2028 in response to load growth by 2030
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation
- Additional solar resources selected due to limited capacity factors on thermal resources
- DR, EE, DER, CVR increase as the load and energy increase with the HSL

## Observations for 2031+:

- Substantially more wind and solar selected than reference scenario
- Additional existing CC's selected to meet the load growth in the same period and the expiration of existing capacity purchase agreements
- Cook SLR selected in 2035 and 2038
- Additional EE selected compared to reference scenario

# Low Carbon Sensitivity: Transition to Objective

Year	Nameplate MW								Accredited MW		Objective Achievement (%)
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity	
2025	0	0	0	0	0	0	0	0	1	325	100%
2026	0	0	0	0	0	0	0	0	27	1,500	100%
2027	0	0	0	0	0	0	0	0	58	1,875	95%
2028	200	1,796	300	0	1,800	0	1,000	0	92	0	92%
2029	400	2,235	300	0	1,800	0	2,000	0	111	0	79%
2030	400	2,224	300	0	2,700	0	2,500	0	121	0	60%
2031	800	2,662	300	0	2,700	0	3,500	0	131	0	62%
2032	1,200	3,845	300	0	2,700	0	3,500	0	149	0	72%
2033	1,600	5,023	300	0	2,700	0	3,500	0	162	0	81%
2034	2,000	6,194	300	0	2,700	0	3,500	0	173	0	82%
2035	2,600	7,360	300	0	2,700	0	3,500	888	185	0	85%
2036	3,200	8,968	450	0	2,700	230	3,500	888	197	0	87%
2037	3,400	10,269	500	0	2,700	230	3,500	1,488	205	0	96%
2038	3,400	10,217	500	0	2,700	230	3,500	2,780	211	0	100%
2039	3,400	10,164	500	0	2,700	230	3,500	2,780	217	0	100%
2040	3,400	10,261	500	0	2,700	230	3,500	2,780	223	0	100%
2041	3,400	10,208	500	0	2,700	230	3,500	2,780	227	0	100%
2042	3,400	10,155	500	0	2,700	230	3,500	2,780	230	0	100%
2043	3,200	9,548	500	0	2,700	230	3,500	3,080	233	0	100%
2044	3,000	9,359	500	0	2,700	230	3,500	3,080	235	0	100%

## Purpose of Scenario:

- Evaluating the most economical solution to achieve the Low Carbon Objective as quickly as possible given the base assumptions for wind and solar build limits

## Observations through 2030:

- Wind and solar selected near build limits
- Selecting CT's and CC's to meet remaining capacity and energy needs
- DR, EE, DER, CVR increase as the load and energy increase with the HSL

## Observations for 2031+:

- SMR selected in 2037, increasing to 1,200MW by 2043
- Substantially more solar and wind selected to meet the carbon-free objective
- Additional CT's selected to meet capacity obligation
- Cook SLR selected in 2035 and 2038

# Low Carbon Sensitivity: Expanded Build Limits

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	19	1,500
2027	0	0	0	0	0	0	0	0	38	1,900
2028	1,200	1,347	0	0	1,800	0	1,000	0	56	0
2029	1,800	3,285	0	0	1,800	0	2,000	0	69	0
2030	3,400	5,513	300	0	1,800	0	3,000	0	80	0
2031	5,000	5,485	300	0	1,800	0	4,000	0	90	0
2032	5,000	5,457	300	0	1,800	0	4,000	0	108	0
2033	5,000	5,430	300	0	1,800	0	4,000	0	122	0
2034	5,000	5,701	300	0	1,800	0	4,000	0	134	0
2035	5,400	7,019	300	0	1,800	0	4,000	888	147	0
2036	6,200	8,030	300	0	1,800	230	4,000	888	158	0
2037	6,200	8,438	300	0	1,800	230	4,000	1,188	167	0
2038	6,200	8,394	300	0	1,800	230	4,000	2,180	175	0
2039	6,200	8,351	300	0	1,800	230	4,000	2,180	182	0
2040	6,200	8,457	350	0	1,800	230	4,000	2,180	187	0
2041	6,200	8,412	350	0	1,800	230	4,000	2,180	192	0
2042	6,200	8,368	350	0	1,800	230	4,000	2,180	195	0
2043	5,000	8,047	350	0	1,800	230	4,000	2,780	198	0
2044	4,600	8,222	350	0	1,800	230	4,000	2,780	200	0

## Purpose of Scenario:

- Evaluating the most economical solution to achieve the Low Carbon Objective starting 2028 with increased wind and solar build limits

## Observations through 2030:

- Substantial expansion in build limits for wind and solar required to meet the carbon-free objective
- Selecting all available existing CT's by 2030 to meet capacity obligation
- Substantially fewer existing CC's selected compared to reference scenario
- EE, DER, CVR increase as the load and energy increase with the HSL

## Observations for 2031+:

- SMR selected in 2037 when first made available and again in 2043
- Substantially more solar and wind selected to meet the carbon-free objective
- Additional CT's selected to meet capacity obligation
- Cook SLR selected in 2035 and 2038

# High Case Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage**	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	350
2026	0	0	0	0	0	0	0	0	28	1,650
2027	0	0	0	0	0	0	0	0	59	2,000
2028	200	1,796	451	0	1,800	0	1,000	0	94	200
2029	200	1,787	451	0	2,700	0	2,000	0	119	0
2030	200	1,778	454	0	2,700	0	3,000	0	135	0
2031	600	1,769	454	0	3,600	0	3,500	0	151	0
2032	1,000	1,760	454	0	3,600	0	3,500	0	167	0
2033	1,400	1,751	454	0	3,600	0	3,500	0	179	0
2034	1,800	1,891	454	1,030	3,600	0	3,500	0	188	0
2035	2,000	2,480	454	1,030	3,600	0	3,500	888	201	0
2036	2,400	3,066	454	1,030	3,600	0	3,500	888	212	0
2037	2,800	3,648	454	1,030	3,600	0	3,500	888	220	0
2038	3,200	3,630	454	1,030	3,600	0	3,500	1,880	226	0
2039	3,200	3,611	454	1,030	3,600	0	3,500	1,880	231	0
2040	3,200	3,592	454	1,030	3,600	0	3,500	1,880	236	0
2041	3,200	3,573	454	1,030	3,600	0	3,500	1,880	239	0
2042	3,200	3,555	454	1,030	3,600	230	3,500	1,880	242	0
2043	3,000	2,982	454	1,030	3,600	230	3,500	1,880	245	0
2044	3,000	3,266	454	1,030	3,600	230	3,500	1,880	246	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering all high economic forecast modeling parameters and assumptions

## Observations through 2030:

- Solar, wind, storage, and gas resources selected in 2028; significantly more solar than reference scenario
- Selected all available existing CT's by 2030 and existing CC's were selected to meet energy needs
- DR, EE, DER, CVR increase as the load and energy increase with the HSL

## Observations for 2031+:

- Significantly more wind is selected compared to the reference scenario
- Fewer new CC's selected compared to the reference scenario due to the additional wind and solar selected
- Additional existing CT's selected compared to the reference scenario to meet capacity obligation
- Cook SLR selected in 2035 and 2038
- Additional EE selected compared to reference scenario

\*Nuclear includes Cook SLR

\*\* Storage includes Distribution-Sited Storage resources

# Low Case Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	75
2026	0	0	0	0	0	0	0	0	23	1,275
2027	0	0	0	0	0	0	0	0	49	1,525
2028	200	0	0	0	1,800	0	1,000	0	79	0
2029	200	0	0	0	2,700	0	1,000	0	90	0
2030	200	0	0	0	3,600	0	1,500	0	94	0
2031	200	0	0	0	3,600	0	1,500	0	98	0
2032	200	0	0	0	3,600	0	1,500	0	97	0
2033	200	0	0	0	3,600	0	1,500	0	94	0
2034	200	0	0	1,030	3,600	0	1,500	0	92	0
2035	200	0	0	1,030	3,600	0	1,500	888	91	0
2036	200	0	0	2,060	3,600	0	1,500	888	88	0
2037	200	0	0	2,060	3,600	0	1,500	888	85	0
2038	200	0	0	2,060	3,600	0	1,500	1,880	82	0
2039	200	0	0	2,060	3,600	0	1,500	1,880	79	0
2040	200	0	0	2,060	3,600	0	1,500	1,880	78	0
2041	200	0	0	2,060	3,600	0	1,500	1,880	70	0
2042	200	0	0	2,060	3,600	0	1,500	1,880	64	0
2043	0	0	0	2,060	3,600	0	1,500	1,880	57	0
2044	200	0	0	2,060	3,600	0	1,500	1,880	56	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering all low economic forecast modeling parameters and assumptions

## Observations through 2030:

- Wind and gas resources selected in 2028 in response to load growth by 2030
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation
- Fewer DR, EE, DER, CVR are selected compared to reference scenario

## Observations for 2031+:

- New CC built in 2034 and 2036 to meet the load growth in the same period and the expiration of existing capacity purchase agreements
- Fewer existing CT's selected compared to reference scenario due to lower capacity obligation
- Cook SLR selected in 2035 and 2038

# Expanded Wind Availability (Base) Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	27	1,500
2027	0	0	0	0	0	0	0	0	58	1,875
2028	1,200	150	0	0	1,800	0	1,000	0	92	0
2029	1,200	149	0	0	2,700	0	1,000	0	110	0
2030	1,200	148	0	0	3,600	0	1,500	0	120	0
2031	1,200	147	0	0	3,600	0	2,000	0	129	0
2032	1,200	147	0	0	3,600	0	2,000	0	146	0
2033	1,200	146	0	0	3,600	0	2,000	0	158	0
2034	1,200	145	0	1,030	3,600	0	2,000	0	168	0
2035	1,200	144	0	1,030	3,600	0	2,000	888	180	0
2036	1,200	144	0	2,060	3,600	0	2,000	888	191	0
2037	1,200	143	0	2,060	3,600	0	2,000	888	199	0
2038	1,200	142	0	2,060	3,600	0	2,000	1,880	206	0
2039	1,200	141	0	2,060	3,600	0	2,000	1,880	212	0
2040	1,200	141	0	2,060	3,600	0	2,000	1,880	217	0
2041	1,200	140	0	2,060	3,600	0	2,000	1,880	221	0
2042	1,200	139	0	2,060	3,600	230	2,000	1,880	225	0
2043	0	0	0	2,060	3,600	230	2,000	1,880	227	0
2044	0	0	0	2,060	3,600	230	2,000	1,880	229	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering all base modeling parameters and additional wind availability through 2030

## Observations through 2030:

- Additional wind selected by the model reduces solar and storage resources compared to the reference scenario
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation similar to the reference scenario

## Observations for 2031+:

- New CC built in 2034 and 2036 to meet the load growth in the same period and the expiration of existing capacity purchase agreements similar to the reference scenario
- New CT built in 2042 compared to the reference scenario to meet capacity obligation
- Cook SLR selected in 2035 and 2038



# Expanded Wind Availability (EER) Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	27	1,500
2027	0	0	0	0	0	0	0	0	57	1,875
2028	1,000	599	50	0	1,800	0	1,000	0	90	0
2029	1,000	596	50	0	2,700	0	1,000	0	113	0
2030	1,000	593	50	0	3,600	0	1,500	0	129	0
2031	1,400	590	50	0	5,400	0	1,500	0	143	0
2032	1,800	587	50	0	5,400	0	1,500	0	166	0
2033	2,200	1,182	50	0	5,400	0	1,500	0	182	0
2034	2,600	1,775	50	0	5,400	0	1,500	0	196	0
2035	2,800	2,364	50	0	5,400	0	1,500	888	212	0
2036	3,200	2,951	50	0	5,400	0	1,500	888	228	0
2037	3,600	3,534	50	0	5,400	0	1,500	888	240	0
2038	4,000	3,815	50	0	5,400	0	1,500	1,880	251	0
2039	4,000	3,796	50	0	5,400	0	1,500	1,880	260	0
2040	4,000	3,776	50	0	5,400	0	1,500	1,880	269	0
2041	4,000	3,757	50	0	5,400	0	1,500	1,880	276	0
2042	4,000	3,737	50	0	5,400	0	1,500	1,880	281	0
2043	3,000	4,167	50	0	5,400	230	1,500	1,880	286	0
2044	3,000	4,145	50	0	5,400	230	1,500	1,880	290	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering implementation of EPA Section 111(b)(d) greenhouse gas rules and associated market commodity price impacts with the expansion of wind availability through 2030

## Observations through 2030:

- Additional wind selected by the model reduces solar and storage resources compared to the EER scenario
- All available existing CC's by 2030 and existing CT's were selected to meet capacity obligation

## Observations for 2031+:

- Similar to the EER scenario, substantial wind, solar, and existing CC's selected to meet the load growth and the expiration of existing capacity purchase agreements
- Cook SLR selected in 2035 and 2038



# Base with High Load Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage**	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	350
2026	0	0	0	0	0	0	0	0	28	1,650
2027	0	0	0	0	0	0	0	0	59	2,000
2028	200	1,796	451	0	1,800	0	1,000	0	94	200
2029	200	1,787	451	0	2,700	0	1,500	0	100	0
2030	200	1,778	451	0	3,600	0	2,000	0	97	0
2031	600	1,769	451	0	3,600	0	3,000	0	96	0
2032	600	1,760	451	0	3,600	0	3,000	0	95	0
2033	600	1,751	451	0	3,600	0	3,000	0	91	0
2034	600	1,742	451	1,030	3,600	0	3,000	0	88	0
2035	600	1,733	451	1,030	3,600	0	3,000	888	86	0
2036	600	1,724	451	2,060	3,600	0	3,000	888	84	0
2037	1,000	1,715	451	2,060	3,600	0	3,000	888	80	0
2038	1,200	1,706	451	2,060	3,600	0	3,000	1,880	76	0
2039	1,200	1,697	451	2,060	3,600	0	3,000	1,880	75	0
2040	1,200	1,688	451	2,060	3,600	0	3,000	1,880	74	0
2041	1,200	1,679	451	2,060	3,600	0	3,000	1,880	68	0
2042	1,200	1,670	451	2,060	3,600	230	3,000	1,880	62	0
2043	1,000	1,107	451	2,060	3,600	460	3,000	1,880	56	0
2044	1,000	1,251	451	2,060	3,600	460	3,000	1,880	55	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering base modeling parameters and assumptions with High Load forecast scenario

## Observations through 2030:

- Solar, wind, storage, and gas resources selected in 2028 in response to load growth by 2030
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation
- Increased Short Term Capacity purchased compared to reference scenario due to increased Capacity Obligation due to higher load
- Additional solar and CT resources selected by 2030 in response to higher load compared to reference scenario

## Observations for 2031+:

- More wind and CT's are selected compared to the reference scenario
- New CC built in 2034 and 2036 to meet the load growth in the same period and the expiration of existing capacity purchase agreements similar to the reference scenario
- Cook SLR selected in 2035 and 2038

\*Nuclear includes Cook SLR

\*\* Storage includes Distribution-Sited Storage resources

# Base with Low Load Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	75
2026	0	0	0	0	0	0	0	0	23	1,275
2027	0	0	0	0	0	0	0	0	49	1,525
2028	200	0	0	0	1,800	0	1,000	0	79	0
2029	200	0	0	0	2,700	0	1,000	0	97	0
2030	200	0	0	0	3,600	0	1,500	0	106	0
2031	600	0	0	0	3,600	0	2,000	0	115	0
2032	600	0	0	0	3,600	0	2,000	0	111	0
2033	800	0	0	0	3,600	0	2,000	0	105	0
2034	800	0	0	1,030	3,600	0	2,000	0	100	0
2035	800	0	0	1,030	3,600	0	2,000	888	99	0
2036	800	0	0	1,030	3,600	0	2,000	888	96	0
2037	1,200	0	0	1,030	3,600	0	2,000	888	92	0
2038	1,200	0	0	1,030	3,600	0	2,000	1,880	87	0
2039	1,200	0	0	1,030	3,600	0	2,000	1,880	84	0
2040	1,200	0	0	1,030	3,600	0	2,000	1,880	81	0
2041	1,200	0	0	1,030	3,600	0	2,000	1,880	73	0
2042	1,200	0	0	1,030	3,600	0	2,000	1,880	65	0
2043	1,000	0	0	1,030	3,600	0	2,000	1,880	58	0
2044	1,000	0	0	1,030	3,600	0	2,000	1,880	53	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering base modeling parameters and assumptions with Low Load forecast scenario

## Observations through 2030:

- Wind and gas resources selected in 2028 in response to load growth by 2030
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation
- Unlike the reference scenario, less short term capacity and no solar or storage are selected

## Observations for 2031+:

- New CC built in 2034 and additional wind resources built to meet the load growth in the same period and the expiration of existing capacity purchase agreements
- Cook SLR selected in 2035 and 2038

# High Technology Cost Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	28	1,500
2027	0	0	0	0	0	0	0	0	59	1,875
2028	200	599	450	0	1,800	0	1,000	0	94	0
2029	200	596	450	0	2,700	0	1,000	0	100	0
2030	200	593	450	0	3,600	0	1,500	0	97	0
2031	200	590	450	0	3,600	0	2,000	0	96	0
2032	200	587	450	0	3,600	0	2,000	0	115	0
2033	200	584	450	0	3,600	0	2,000	0	131	0
2034	200	581	450	1,030	3,600	0	2,000	0	144	0
2035	200	578	450	1,030	3,600	0	2,000	888	156	0
2036	200	575	450	2,060	3,600	0	2,000	888	169	0
2037	200	572	450	2,060	3,600	0	2,000	888	177	0
2038	200	569	450	2,060	3,600	0	2,000	1,880	185	0
2039	200	566	450	2,060	3,600	0	2,000	1,880	193	0
2040	200	563	450	2,060	3,600	0	2,000	1,880	201	0
2041	200	560	450	2,060	3,600	0	2,000	1,880	207	0
2042	200	557	450	2,060	3,600	0	2,000	1,880	211	0
2043	0	554	450	2,060	3,600	0	2,000	1,880	213	0
2044	0	551	450	2,060	3,600	0	2,000	1,880	220	0

## Purpose of Scenario:

- Evaluating the most economical solution to meet capacity and energy needs considering base modeling parameters and assumptions with increased resource installed costs

## Observations through 2030:

- Resources selected are identical to the reference case starting in 2025 and for the remainder of the planning horizon
- Solar, wind, storage, and gas resources selected in 2028 to meet the capacity and energy obligations are not impacted by the higher cost assumptions
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation

## Observations for 2031+:

- New CC built in 2034 and 2036 to meet the capacity and energy obligations are not impacted by the higher cost assumptions
- Cook SLR selected in 2035 and 2038

# Rockport Unit 1 Retires 2025 Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	1,250
2026	0	0	0	0	0	0	0	0	28	2,425
2027	0	0	0	0	0	0	0	0	59	2,825
2028	200	599	450	0	1,800	0	1,000	0	94	0
2029	200	596	450	0	2,700	0	1,000	0	100	0
2030	200	593	450	0	3,600	0	1,500	0	97	0
2031	200	590	450	0	3,600	0	2,000	0	96	0
2032	200	587	450	0	3,600	0	2,000	0	115	0
2033	200	584	450	0	3,600	0	2,000	0	131	0
2034	200	581	450	1,030	3,600	0	2,000	0	144	0
2035	200	578	450	1,030	3,600	0	2,000	888	156	0
2036	200	575	450	2,060	3,600	0	2,000	888	169	0
2037	200	572	450	2,060	3,600	0	2,000	888	177	0
2038	200	569	450	2,060	3,600	0	2,000	1,880	185	0
2039	200	566	450	2,060	3,600	0	2,000	1,880	193	0
2040	200	563	450	2,060	3,600	0	2,000	1,880	201	0
2041	200	560	450	2,060	3,600	0	2,000	1,880	207	0
2042	200	557	450	2,060	3,600	0	2,000	1,880	211	0
2043	0	554	450	2,060	3,600	0	2,000	1,880	213	0
2044	0	551	450	2,060	3,600	0	2,000	1,880	220	0

## Purpose of Scenario\*\*:

- Evaluating the most economical solution to meet capacity and energy needs considering base modeling parameters and assumptions of Rockport retiring 5/31/2025

## Observations through Planning Horizon:

- Additional Short Term Capacity purchases compared to the reference case until new resources become available in 2028
- Resources selected are identical to the reference case starting in 2028 and for the remainder of the planning horizon

\*Nuclear includes Cook SLR

\*\* Required per Cause No. 45546

# Rockport Unit 1 Retires 2026 Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	28	2,425
2027	0	0	0	0	0	0	0	0	59	2,825
2028	200	599	450	0	1,800	0	1,000	0	94	0
2029	200	596	450	0	2,700	0	1,000	0	100	0
2030	200	593	450	0	3,600	0	1,500	0	97	0
2031	200	590	450	0	3,600	0	2,000	0	96	0
2032	200	587	450	0	3,600	0	2,000	0	115	0
2033	200	584	450	0	3,600	0	2,000	0	131	0
2034	200	581	450	1,030	3,600	0	2,000	0	144	0
2035	200	578	450	1,030	3,600	0	2,000	888	156	0
2036	200	575	450	2,060	3,600	0	2,000	888	169	0
2037	200	572	450	2,060	3,600	0	2,000	888	177	0
2038	200	569	450	2,060	3,600	0	2,000	1,880	185	0
2039	200	566	450	2,060	3,600	0	2,000	1,880	193	0
2040	200	563	450	2,060	3,600	0	2,000	1,880	201	0
2041	200	560	450	2,060	3,600	0	2,000	1,880	207	0
2042	200	557	450	2,060	3,600	0	2,000	1,880	211	0
2043	0	554	450	2,060	3,600	0	2,000	1,880	213	0
2044	0	551	450	2,060	3,600	0	2,000	1,880	220	0

## Purpose of Scenario\*\*:

- Evaluating the most economical solution to meet capacity and energy needs considering base modeling parameters and assumptions of Rockport retiring 5/31/2026

## Observations through Planning Horizon:

- Additional Short Term Capacity purchases compared to the reference case until new resources become available in 2028
- Resources selected are identical to the reference case starting in 2028 and for the remainder of the planning horizon

\*Nuclear includes Cook SLR

\*\* Required per Cause No. 45546

# Exit OVEC ICPA in 2030 Portfolio

Year	Nameplate MW								Accredited MW	
	Wind	Solar	Storage	New CC	Existing CC	New CT	Existing CT	Nuclear*	DR, EE, DER, CVR	Short Term Capacity
2025	0	0	0	0	0	0	0	0	1	325
2026	0	0	0	0	0	0	0	0	28	1,500
2027	0	0	0	0	0	0	0	0	59	1,875
2028	200	599	450	0	1,800	0	1,000	0	94	0
2029	200	596	450	0	1,800	0	2,000	0	119	0
2030	200	593	450	0	3,600	0	2,000	0	135	0
2031	200	590	450	0	3,600	0	2,000	0	151	0
2032	200	587	450	0	3,600	0	2,000	0	173	0
2033	200	584	450	0	3,600	0	2,000	0	190	0
2034	200	581	450	1,030	3,600	0	2,000	0	204	0
2035	200	578	450	1,030	3,600	0	2,000	888	221	0
2036	200	575	450	2,060	3,600	0	2,000	888	237	0
2037	200	572	450	2,060	3,600	0	2,000	888	250	0
2038	200	569	450	2,060	3,600	0	2,000	1,880	261	0
2039	200	566	450	2,060	3,600	0	2,000	1,880	270	0
2040	200	563	450	2,060	3,600	0	2,000	1,880	279	0
2041	200	560	450	2,060	3,600	0	2,000	1,880	286	0
2042	200	557	450	2,060	3,600	0	2,000	1,880	292	0
2043	0	554	450	2,060	3,600	0	2,000	1,880	298	0
2044	0	551	450	2,060	3,600	0	2,000	1,880	302	0

## Purpose of Scenario\*\*:

- Evaluating the most economical solution to meet capacity and energy needs considering base modeling parameters and assumptions of the termination of operation of the Ohio Valley Electric Corporation (OVEC) units under the Intercompany Power Agreement (ICPA) by the end of 2030

## Observations through 2030:

- Resources selected are substantially similar to the reference case for 2028+
- Solar, wind, storage, and gas resources selected in 2028 in response to load growth by 2030
- Selected all available existing CC's by 2030 and existing CT's were selected to meet capacity obligation
- Additional DR, EE, DER, CVR selected compared to reference scenario

## Observations for 2031+:

- New CC built in 2034 and 2036 to meet the load growth in the same period and the expiration of existing capacity purchase agreements
- Cook SLR selected in 2035 and 2038

\*Nuclear includes Cook SLR

\*\* Required per Cause No. 45546. The ICPA does not have any provision for early termination by one or more of the Sponsoring Companies.

# Results Summary Comparison and Portfolio Performance Indicators

Appendix

# Results Summary Comparison

Portfolio	2034								2044							
	Nameplate Capacity Additions (MW)								Nameplate Capacity Additions (MW)							
	Wind	Solar	Storage	NGCT	NGCC	Nuclear*	DR, EE, DER, CVR**	Total Additions	Wind	Solar	Storage	NGCT	NGCC	Nuclear*	DR, EE, DER, CVR**	Total Additions
<b>Preferred Portfolio</b>	2,600	2,071	50	2,190	4,500	0	134	<b>11,545</b>	3,000	2,542	50	2,190	4,500	2,480	94	<b>14,856</b>
<b>Base Reference</b>	200	581	450	2,000	4,630	0	144	<b>8,005</b>	0	551	450	2,000	5,660	1,880	220	<b>10,761</b>
<b>Enhanced Environmental Regulations</b>	1,800	3,238	350	1,500	5,400	0	178	<b>12,466</b>	3,000	4,092	350	1,730	5,400	1,880	233	<b>16,685</b>
<b>Base Under EPA Section 111(b)(d)</b>	1,800	3,245	400	1,500	5,400	0	182	<b>12,527</b>	2,800	4,517	400	1,730	5,400	1,880	236	<b>16,963</b>
<b>Low Carbon: Transition</b>	2,000	6,194	300	3,500	2,700	0	173	<b>14,867</b>	3,000	9,359	500	3,730	2,700	3,080	235	<b>22,604</b>
<b>Low Carbon: Expanded Build Limits</b>	5,000	5,701	300	4,000	1,800	0	134	<b>16,935</b>	4,600	8,222	350	4,230	1,800	2,780	200	<b>22,182</b>
<b>High Growth</b>	1,800	1,891	454	3,500	4,630	0	188	<b>12,463</b>	3,000	3,266	450	3,730	4,630	1,880	246	<b>17,202</b>
<b>Low Growth</b>	200	0	0	1,500	4,630	0	92	<b>6,422</b>	200	0	0	1,500	5,660	1,880	56	<b>9,296</b>

\*Nuclear includes Cook SLR and SMR

\*\*DR, EE, DER, CVR values are accredited



# Results Summary Comparison

Portfolio	2034								2044							
	Nameplate Capacity Additions (MW)								Nameplate Capacity Additions (MW)							
	Wind	Solar	Storage	NGCT	NGCC	Nuclear*	DR, EE, DER, CVR**	Total Additions	Wind	Solar	Storage	NGCT	NGCC	Nuclear*	DR, EE, DER, CVR**	Total Additions
Base Reference	200	581	450	2,000	4,630	0	144	8,005	0	551	450	2,000	5,660	1,880	220	10,761
Expanded Wind Availability (Base)	1,200	145	0	2,000	4,630	0	168	8,143	0	0	0	2,230	5,660	1,880	229	9,999
Expanded Wind Availability (EER)	2,600	1,775	50	1,500	5,400	0	196	11,521	3,000	4,145	50	1,730	5,400	1,880	290	16,495
Base with High Load	600	1,742	451	3,000	4,630	0	88	10,511	1,000	1,251	451	3,460	5,660	1,880	55	13,757
Base with Low Load	800	0	0	2,000	4,630	0	100	7,530	1,000	0	0	2,000	4,630	1,880	53	9,563
High Technology Cost	200	581	450	2,000	4,630	0	144	8,005	0	551	450	2,000	5,660	1,880	220	10,761
Rockport Unit 1 Retires 2025	200	581	450	2,000	4,630	0	144	8,005	0	551	450	2,000	5,660	1,880	220	10,761
Rockport Unit 1 Retires 2026	200	581	450	2,000	4,630	0	144	8,005	0	551	450	2,000	5,660	1,880	220	10,761
Exit OVEC ICPA in 2030	200	581	450	2,000	4,630	0	204	8,065	0	551	450	2,000	5,660	1,880	302	10,843

\*Nuclear includes Cook SLR and SMR

\*\*DR, EE, DER, CVR values are accredited

# Portfolio Performance Indicators

IURC Pillar	IRP Objective	Performance Indicator	Metric Description
Reliability	Maintain capacity reserve margin and the consideration of reliance on the market for the benefit of customers.	Energy Market Exposure – Purchases	NPV of market purchases and average volume exposure of market purchases (Costs and MWhs % of Internal Load) over 10 and 20 years. <b>Lower values are better.</b>
		Energy Market Exposure – Sales	NPV of market sales and average volume exposure of market sales (Revenues and MWhs % of Internal Load) over 10 and 20 years. <b>Lower values are better.</b>
		Planning Reserves	Average Target Reserve Margin over 10 and 20 years. <b>Closest value to the % Target.</b>
Affordability	Maintain focus on power supply cost and risks to customers	Net Present Value Revenue Requirement (NPVRR)	Portfolio 30yr NPVRR (power supply costs). <b>Lower values are better.</b>
		Near-Term Power Supply Cost Impacts (CAGR)	7-year CAGR of Annual Power Supply Cost. <b>Lower values are better.</b>
		Portfolio Resilience	Range of Portfolio NPVRR (power supply costs) dispatched across all Scenarios. <b>Lower values are better.</b>
Resiliency	Maintain diversity of resources and fleet dispatchability	Resource Diversity	Percent change in Diversity Index inclusive of Capacity and Energy Diversity in years 2034 and 2044. <b>Higher values are better.</b>
(Grid) Stability	Maintain fleet of flexible and dispatchable resources	Fleet Resiliency	Average % dispatchable capacity of company peak load over 10 and 20 years. <b>Higher values are better.</b>
Environmental Sustainability	Maintain focus on portfolio environmental sustainability benefits and compliance costs	Emissions Change	CO <sub>2</sub> , NO <sub>x</sub> , SO <sub>2</sub> emissions change compared to 2005 levels in years 2034 and 2044. <b>Higher values are better.</b>
		Net Present Value Revenue Requirement (NPVRR)	Considered under Affordability Pillar above

# Portfolio Performance Indicators

Pillar	Affordability			Reliability			Reliability/	Grid Stability	Environmental Sustainability		
							Resiliency	Resiliency			
Performance Indicators and Metrics	Short Term 7-yr Rate CAGR Power Supply \$/MWh	Long Term Supply Portfolio NPVRR Power Supply Costs	Portfolio Resilience: High Minus Low Scenario Range, Portfolio NPVRR	Energy Market Risk Purchases	Energy Market Risk Sales	Planning Reserves % Reserve Margin	Resource Diversity	Fleet Resiliency: Dispatchable Capacity	Emissions Analysis: % Change from 2005 Baseline		
Year Ref.	2024-2031	2025-2044	2025-2044	10 years   20 years	10 years   20 years	10 years   20 years	10 years   20 years	10 years   20 years	2034   2044		
Units	%	\$B	\$B	NPV of Market Purchases & MWhs % of Total Demand	NPV of Market Sales & MWhs % of Total Demand	Average of Annual PRM %	Portfolio Index Percent Change from 2025	Dispatchable Nameplate MW/ % of Company Peak Demand	% Change CO <sub>2</sub>	% Change NOx	% Change SO <sub>2</sub>
Preferred Portfolio	0.4%	\$33.1	\$11.4	10 Years: \$3.1B (31%) 20 Years: \$5.3B (27%)	10 Years: \$0.2B (1.3%) 20 Years: \$0.5B (2.3%)	10 Years: 4.2% 20 Years: -0.6%	Capacity: 39%   35% Energy: 299%   299%	10 Years: 91% 20 Years: 93%	2034: -63% 2044: -63%	2034: -96% 2044: -96%	2034: -100% 2044: -100%
Base Reference	-0.5%	\$32.0	\$13.4	10 Years: \$2.6B (27%) 20 Years: \$4.3B (22%)	10 Years: \$0.0B (0.1%) 20 Years: \$0.1B (0.3%)	10 Years: -0.7% 20 Years: -3.4%	Capacity: 31%   19% Energy: 173%   139%	10 Years: 90% 20 Years: 97%	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%
Enhanced Environmental Regulations	0.7%	\$33.2	N/A	10 Years: \$3.1B (31%) 20 Years: \$5.5B (28%)	10 Years: \$0.6B (4.2%) 20 Years: \$1.4B (5.7%)	10 Years: 5.3% 20 Years: -0.3%	Capacity: 35%   37% Energy: 306%   325%	10 Years: 95% 20 Years: 95%	2034: -56% 2044: -55%	2034: -95% 2044: -95%	2034: -100% 2044: -100%
Base Under EPA Section 111(b)(d)	0.7%	\$33.3	N/A	10 Years: \$3.1B (31%) 20 Years: \$5.5B (28%)	10 Years: \$0.5B (4.0%) 20 Years: \$1.4B (5.7%)	10 Years: 5.5% 20 Years: -0.2%	Capacity: 36%   38% Energy: 281%   299%	10 Years: 96% 20 Years: 96%	2034: -56% 2044: -55%	2034: -95% 2044: -95%	2034: -100% 2044: -100%
Low Carbon: Expanded Build Limits	4.5%	\$41.4	N/A	10 Years: \$2.1B (22%) 20 Years: \$3.6B (18%)	10 Years: \$0.4B (3.6%) 20 Years: \$1.4B (6.0%)	10 Years: 4.5% 20 Years: -0.8%	Capacity: 56%   52% Energy: 317%   311%	10 Years: 87% 20 Years: 88%	2034: -77% 2044: -77%	2034: -97% 2044: -97%	2034: -100% 2044: -100%
Low Carbon: Transition	1.3%	\$39.9	\$9.8	10 Years: \$2.7B (27%) 20 Years: \$4.1B (20%)	10 Years: \$0.2B (1.6%) 20 Years: \$1.7B (7.7%)	10 Years: 2.0% 20 Years: 0.5%	Capacity: 53%   54% Energy: 302%   304%	10 Years: 91% 20 Years: 95%	2034: -65% 2044: -65%	2034: -96% 2044: -96%	2034: -100% 2044: -100%
High Growth	1.6%	\$39.3	N/A	10 Years: \$4.0B (30%) 20 Years: \$6.6B (23%)	10 Years: \$0.1B (0.5%) 20 Years: \$0.3B (0.9%)	10 Years: 3.9% 20 Years: -0.7%	Capacity: 41%   43% Energy: 71%   79%	10 Years: 96% 20 Years: 97%	2034: -46% 2044: -34%	2034: -95% 2044: -93%	2034: -100% 2044: -100%
Low Growth	-2.3%	\$25.7	N/A	10 Years: \$1.8B (24%) 20 Years: \$2.5B (19%)	10 Years: \$0.0B (0.3%) 20 Years: \$0.2B (1.9%)	10 Years: -0.3% 20 Years: -1.5%	Capacity: 18%   5% Energy: 161%   154%	10 Years: 89% 20 Years: 97%	2034: -35% 2044: -35%	2034: -93% 2044: -94%	2034: -100% 2044: -100%
Expanded Wind Availability (Base)	-0.5%	\$31.8	N/A	10 Years: \$2.4B (25%) 20 Years: \$3.9B (20%)	10 Years: \$0.0B (0.2%) 20 Years: \$0.1B (0.6%)	10 Years: -0.6% 20 Years: -3.4%	Capacity: 28%   12% Energy: 188%   114%	10 Years: 86% 20 Years: 93%	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%
Expanded Wind Availability (EER)	0.5%	\$32.8	\$11.4	10 Years: \$3.1B (31%) 20 Years: \$5.4B (27%)	10 Years: \$0.5B (3.5%) 20 Years: \$1.3B (5.2%)	10 Years: 5.1% 20 Years: -0.6%	Capacity: 31%   34% Energy: 296%   318%	10 Years: 92% 20 Years: 92%	2034: -56% 2044: -55%	2034: -95% 2044: -95%	2034: -100% 2044: -100%

# Portfolio Performance Indicators

Pillar	Affordability			Reliability			Reliability/	Grid Stability	Environmental Sustainability			
							Resiliency	Resiliency				
Performance Indicators and Metrics	Short Term 7-yr Rate CAGR Power Supply \$/MWh	Long Term Supply Portfolio NPVRR Power Supply Costs	Portfolio Resilience: High Minus Low Scenario Range, Portfolio NPVRR	Energy Market Risk Purchases	Energy Market Risk Sales	Planning Reserves % Reserve Margin	Resource Diversity	Fleet Resiliency: Dispatchable Capacity	Emissions Analysis: % Change from 2005 Baseline			
	Year Ref.	2024-2031	2025-2044	2025-2044	10 years   20 years	10 years   20 years	10 years   20 years	10 years   20 years	10 years   20 years	2034   2044		
	Units	%	\$B	\$B	NPV of Market Purchases & MWhs % of Total Demand	NPV of Market Sales & MWhs % of Total Demand	Average of Annual PRM %	Portfolio Index Percent Change from 2025	Dispatchable Nameplate MW/ % of Company Peak Demand	% Change CO <sub>2</sub>	% Change NOx	% Change SO <sub>2</sub>
	Base with High Load	-0.1%	\$34.9	N/A	10 Years: \$2.8B (28%) 20 Years: \$4.9B (23%)	10 Years: \$0.0B (0.3%) 20 Years: \$0.1B (0.3%)	10 Years: 0.8% 20 Years: -2.6%	Capacity: 34%   25% Energy: 208%   189%	10 Years: 92% 20 Years: 98%	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%
	Base with Low Load	-0.7%	\$28.3	N/A	10 Years: \$2.1B (24%) 20 Years: \$3.6B (20%)	10 Years: \$0.1B (0.5%) 20 Years: \$0.1B (0.7%)	10 Years: 2.3% 20 Years: -1.9%	Capacity: 24%   19% Energy: 170%   172%	10 Years: 92% 20 Years: 96%	2034: -39% 2044: -39%	2034: -94% 2044: -94%	2034: -100% 2044: -100%
	High Technology Costs	0.7%	\$34.8	N/A	10 Years: \$2.6B (27%) 20 Years: \$4.3B (22%)	10 Years: \$0.0B (0.1%) 20 Years: \$0.1B (0.3%)	10 Years: -0.7% 20 Years: -3.4%	Capacity: 31%   19% Energy: 173%   139%	10 Years: 90% 20 Years: 97%	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%
	Rockport Unit 1 Retires 2025	-0.5%	\$32.6	N/A	10 Years: \$2.6B (27%) 20 Years: \$4.3B (22%)	10 Years: \$0.0B (0.1%) 20 Years: \$0.1B (0.3%)	10 Years: -0.7% 20 Years: -3.4%	Capacity: 80%   64% Energy: 183%   148%	10 Years: 84% 20 Years: 95%	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%
	Rockport Unit 1 Retires 2026	-0.5%	\$32.4	N/A	10 Years: \$2.6B (27%) 20 Years: \$4.3B (22%)	10 Years: \$0.0B (0.1%) 20 Years: \$0.1B (0.3%)	10 Years: -0.6% 20 Years: -3.4%	Capacity: 31%   19% Energy: 173%   139%	10 Years: 86% 20 Years: 95%	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%
	Exit OVEC ICPA in 2030	-0.4%	\$32.1	N/A	10 Years: \$2.8B (28%) 20 Years: \$4.4B (22%)	10 Years: \$0.0B (0.1%) 20 Years: \$0.1B (0.3%)	10 Years: -0.6% 20 Years: -3.2%	Capacity: 27%   21% Energy: 177%   142%	10 Years: 90% 20 Years: 97%	2034: -39% 2044: -24%	2034: -94% 2044: -93%	2034: -100% 2044: -100%

# Affordability

The Affordability indicators compare the cost to customers under Base Case market scenario conditions over the short- and long-term and the Portfolio cost range when evaluated across the different market scenarios.

Performance Indicator	Metric	Description
Near-term	7-year Power Supply Cost CAGR under the Base Case (2024-2031)	<ul style="list-style-type: none"> <li>I&amp;M measures and considers the expected Compound Annual Growth Rate (“CAGR”) of expected power supply costs for the years 2024-2031 as the metric for the short-term performance indicator</li> <li>A lower number is better, indicating slower growth in power supply costs</li> </ul>
Long-term	Portfolio NPVRR under the Base Case (2025-2044)	<ul style="list-style-type: none"> <li>I&amp;M measures and considers the growth in Net Present Value Revenue Requirement (power supply costs) over 20 years as the long-term metric</li> <li>NPVRR represents total long-term cost paid by I&amp;M related to power supply. This includes plant O&amp;M costs, fuel costs, environmental costs, net purchases and sales of energy and capacity, property and income taxes, and the return on capital</li> <li>A lower number is better, indicating lower costs to supply customers with power</li> </ul>
Portfolio Resilience	High Minus Low Scenario Range 20-yr NPVRR (2025-2044)	<ul style="list-style-type: none"> <li>I&amp;M measures and considers the range of 20-yr NPVRR reported by each portfolio across all PJM market scenarios. This metric reports the difference between the highest and lowest cost scenarios reported by the candidate portfolio on an NPVRR</li> <li>A lower number is better, indicating a tighter grouping of expected customer costs across a wide range of long-term market conditions</li> </ul>

# Reliability

The Reliability indicators compare the amount of excess reserves and the reliance on market resources to serve customers across candidate portfolios.

Performance Indicator	Metric	Description
Planning Reserves	Reserve Margin %	<ul style="list-style-type: none"> <li>I&amp;M measures and considers the average amount of firm capacity in each candidate portfolio over 10 and 20 years</li> <li>A higher number is better, indicating more reserves are available to meet PJM requirements</li> </ul>
Energy Market Risk	Portfolio Cost Range of market purchases, MWs as % of internal Load	<ul style="list-style-type: none"> <li>I&amp;M measures and considers the reliance of each candidate portfolio on market purchases to balance seasonal generation with customer load</li> <li>The metric reports the NPV of the cost of market purchases and the average MWs as a % of internal load over 10 and 20 years</li> <li>A lower number indicates less reliance on the market to meet customer needs</li> </ul>
	Portfolio Revenue Range of market sales, MWs as % of internal Load	<ul style="list-style-type: none"> <li>I&amp;M measures and considers the reliance of each candidate portfolio on market sales to balance seasonal generation with customer load</li> <li>The metric reports the NPV of the cost of market sales and the average MWs as a % of internal load over 10 and 20 years</li> <li>A lower number indicates less reliance on the market to meet customer needs</li> </ul>

# Resiliency

The Resiliency indicators compare the amount of dispatchable capacity in the fleet and the technology diversity for capacity and energy of the Indiana generating mix across candidate portfolios.

Performance Indicator	Metric	Description
Resource Diversity	Percent Change of the Capacity and Energy Diversity Index in 2034 and 2044	<ul style="list-style-type: none"> <li>I&amp;M measures and considers the capacity and energy diversity of new technologies added to its portfolio when comparing candidate portfolios</li> <li>The metric will use the Shannon-Weiner Index to measure the number of different technologies and their respective contribution to the portfolio totals for both capacity and energy diversity for each Portfolio. A percent change from 2025 is calculated in year 2034 and 2044</li> <li>A higher number is better. A portfolio that includes diverse resources for both capacity and energy delivery mitigates customers' performance risk when conditions for that technology are unfavorable</li> </ul>
Fleet Resiliency	Nameplate MW of dispatchable units in 2034 and 2044	<ul style="list-style-type: none"> <li>I&amp;M measures and considers the average amount of dispatchable units added to the portfolio over 10 and 20 years</li> <li>The metric for this indicator is the average of total Nameplate MW of dispatchable units as a percent of company peak demand</li> <li>A higher number is better, indicating greater ability to ramp generation up or down to react to market conditions and follow load</li> </ul>

# (Grid) Stability

The Grid Stability indicator compares the amount of dispatchable capacity in the fleet, and the technology diversity of the Indiana generating mix across candidate portfolios.

Performance Indicator	Metric	Description
Fleet Resiliency	Nameplate MW of dispatchable units in 2034 and 2044	<ul style="list-style-type: none"><li>• I&amp;M measures and considers the average amount of dispatchable units added to the portfolio over 10 and 20 years</li><li>• The metric for this indicator is the average of total Nameplate MW of dispatchable units as a percent of company peak demand</li><li>• A higher number is better, indicating greater ability to ramp generation up or down to react to market conditions and follow load</li></ul>



# Sustainability

I&M also considered a Sustainability indicator to compare portfolio performance towards meeting corporate sustainability targets.

Performance Indicator	Metric	Description
CO <sub>2</sub> , NO <sub>x</sub> , SO <sub>2</sub> , Emissions	2034 & 2044 % Change from 2005 Baseline	<ul style="list-style-type: none"><li>I&amp;M measures and considers the total amount of expected CO<sub>2</sub>, NO<sub>x</sub> and SO<sub>2</sub> emissions of each candidate portfolio.</li><li>This metric compares the forecasted emissions of candidate portfolios in 2034 and 2044 under Reference Case market conditions with actual historical emissions from the year 2005.</li><li>A higher number indicates greater levels of emissions reductions have been achieved and customers are less exposed to potential future CO<sub>2</sub> costs.</li></ul>