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VIA FEDERAL EXPRESS & EMAIL

Hon. Scott S. Harris
Clerk
Supreme Court of the United States
1 First St., NE
Washington, D.C. 20543

Re: *State of West Virginia, et. al. v. Environmental Protection Agency, et. al.*, Nos. 24A95, 24A96, 24A97, 24A98, 24A106, and 24A116

Dear Mr. Harris:

Pursuant to the advice of the Clerk's Office and Rule 32.3 of the Rules of the Supreme Court, the Louisiana Public Service Commission ("LPSC"), intervenor, hereby proposes to lodge the 2023 Reference Case Integrated Planning Model Summary Run Results alleged to support the Environmental Protection Agency ("EPA") Rule subject to the application for a stay in this Court. The Integrated Planning Model Summary Run Results document is not included in the Certified Index to the Record and has not been lodged with the Court, but is available on the EPA website. *EPA IPM Summary Results*, <https://www.epa.gov/power-sector-modeling/results-using-2023-reference-case> (last visited Oct. 8, 2024) (file name "2023 Reference Case SSR") (attached as "Attachment A").

Because of time constraints and the EPA's voluminous record, the LPSC focused on the Rule itself in preparing its Brief Supporting Petitioners. But the discussion in the Rule does not mention the results "with CCS" of the EPA's projections, nor address them in the analyses of

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resource adequacy, the achievability of CCS, or the cost of adding CCS. For instance, the Rule states, based on the Integrated Planning Model, that "[n]ew combined cycle units are 20 GW by 2030," but does not clarify that "0" are projected with CCS. 89 Fed. Reg. 39,798, 40,005. The LPSC did not discover the results of the analysis until after its brief was filed. The data shows that EPA's conclusions with regard to achievability and cost were drawn based on projections that no significant combined cycle generation will ever be added with carbon capture, transportation, and sequestration infrastructure. The same is true of coal capacity "with CCS."

The Integrated Planning Model projects that "0" combined cycle natural gas units will be added with CCS through 2055, the end of the projected period. [Attach. A, "NEW MODELED CAPACITY Table]. The "0" in some results is shown in red, which reflects rounding, so the results are 0-0.5 GW, or 0-499 MW, reflecting a single smaller unit or partial flue stream. The results are similar to those in the EPA's Regulatory Impact Analysis at 3-31 to 3-32, which is included in the Certified Index.

Results from the EPA's Integrated Planning Model show that "0" combined cycle natural gas generating facilities will be added with CCS through 2055. [Attach. A, New Model Capacity ("Natural Gas"), line 2]. The results for natural gas units are depicted below.

NEW MODELED CAPACITY (Cumulative GW)	2028	2030	2035	2040	2045	2050	2055
* * *							
Natural Gas	26	34	34	75	141	261	339
CC without CCS	19	20	20	20	20	48	80
CC with CCS	0	0	0	0	0	0	0

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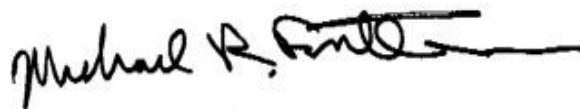
The Integrated Planning Model also projects that "0" coal units will be constructed through 2055 "with CCS." [*Id.*, Coal, line 3]. The results follow:

NEW MODELED CAPACITY (Cumulative GW)	2028	2030	2035	2040	2045	2050	2055
* * *							
Coal	0	0	0	0	0	0	0
Coal without CCS	0	0	0	0	0	0	0
IGCC without CCS	0	0	0	0	0	0	0
Coal with CCS	0	0	0	0	0	0	0

The Integrated Planning Model also projects that only one gigawatt of coal capacity "with CCS" will exist in 2045, 2050, and 2055. [Total Capacity (Cumulative GW) Chart].

These "with CCS" projections are not addressed in the Rule.

Respectfully submitted,



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MRF/hgw