

The tables below were taken from comments submitted by UARG in the rulemaking docket

Table 1 IPM-Modeled Retirements of Coal Capacity and Operating Coal Capacity (MW)

Region	2016			2018		
	EPA IPM-Predicted Retirements in 2016	Owner-Provided or Publicly Available Data		EPA IPM-Predicted Retirements in 2018	Owner-Provided or Publicly Available Data	
		Operating in 2016	Retired in 2016		Operating in 2018	Retired in 2018
CSAPR II	47,690	41,466	6,224	56,505	44,836	11,669
Non-CSAPR	16,764	16,119	645	18,588	13,544	5,044
Total	64,454	57,585	6,869	75,093	58,380	16,713

Table 2 IPM-Modeled Coal-to-Gas Conversions and Operating Coal Capacity (MW)

Region	2016		2018	
	EPA IPM-Predicted Conversions in 2016	Owner-Provided or Publicly Available Data on Units Operating as Coal in 2016	EPA IPM-Predicted Conversions in 2018	Owner-Provided or Publicly Available Data on Units Operating as Coal in 2018
CSAPR II	7,277	1,456	9,205	2,505
Non-CSAPR	1,015	0	1,015	0
Total	8,292	1,456	10,220	2,505

Table 3 EPA IPM-Predicted Retirements in the 2018 Proposed Case and potential effect of these units remaining in operation on selected states' emission budgets

State	EPA Proposed Budgets		Re-Set Budgets		Percent Budget Change	IPM Retired Capacity that will Remain Operational in 2018
	2018 IPM Emission Rate	2017 Budget	2018 Corrected Emission Rate	2017 Corrected Budget		
IL	0.062	12,078	0.077	14,976	24.0	ED Edwards 2& 3, Hennepin 1 & 2, Joppa 1-6, Newton 1 & 2, Powerton 51, 52 & 61, Dallman 33, Baldwin 3
PA	0.057	14,387	0.067	16,932	17.7	Cambria Cogen B1-B2, Ebensburg Power 031, John B Rich CFB1 & CFB2, Kline Township 1, Northampton Generating BLR1, PH Glatfelter B036, Brunner Island 1-3, St. Nicholas Cogen 1, Wheelabrator Frackville BLR1, WPS Westwood 031, Montour 1 & 2
NC	0.078	12,275	0.097	15,342	25.0	CG Allen 1,2 & 5, Marshall 1-4, Roxboro 1-3, Roanoke Vally II BLR2
TN	0.056	5,481	0.059	6,810	24.2	Allen 1-3, Gallatin 1-4 and Johnsonville 1-4 operating in 2017 resulting in a 2017 budget adjustment of 1,052 tons based upon 2015 seasonal emissions
WI	0.054	5,561	0.069	7,052	26.8	Columbia 1 & 2, Manitowoc 8 & 9, Pulliam 7 & 8, Weston 3, South Oak Creek 7, Edgewater 4 (no gas conversion)

Note: Newton 2 and Baldwin 3 to be deactivated in September, 2016 and March 2017, due to low power prices, but both units could be operating in 2018 due to MISO's projected capacity shortages. These deactivations occurred after the comments were filed. The corrected 2017 budget represents a best attempt at replicating the effect of EPA's erroneous retirements on 2017 state budgets, recognizing that EPA's modeling specifics are not made available to the public.