

26 **CSI Undertaking 30: Regulatory Jurisdictions Treatment of Carbon Pricing:**

27 It is found that few regulatory bodies in MISO direct the utilities they regulate to make carbon
 28 pricing assumptions in their resource planning like Minnesota does. However, we note that
 29 most regulators reviewed do incorporate carbon pricing, or consider carbon policy in some way
 30 in their proceedings in a one-off, or proceeding by proceeding manner. In nearly all regulators
 31 assessed, MNP identified some level of carbon price assumption in review of resource planning
 32 or during approvals processes. A summary table of relevant information follows:

State	Regulator	Planning Cost for CO ₂ (\$/ton)	Year Implemented	Directive or Guideline	Source
Minnesota	MPUC	\$9 to \$34	2008	Directive - MPUC established a planning cost assumption for CO ₂ emissions from electricity generation, assumed to be in force starting in 2012 and representing the expected regulation of carbon emissions. Many utilities are in support of this assumption for regulatory and planning purposes including Xcel Energy, IPL and Minnesota Power.	https://www.edockets.state.mn.us/Efilling/edockets/search/Documents.do?method=showPoup&documentid=%7B23D2D808-F8CF-4919-8E81-4163F914A5AC%7D&documentTitle=201210-79320-01
North Dakota	NDPSC	N/A	N/A	None - In February, 2014 the NDPSC submitted a letter to the EPA in opposition of proposed regulations that would limit carbon emissions.	http://www.4-traders.com/news/North-Dakota-Public-Service-Commission-PSC-Submits-Letter-to-EPA-In-Opposition-of-Proposed-Regulat-18025308/
South Dakota	SDPUC	\$18 to \$76	N/A	Guideline - In 2009 the SDPUC completed a study of the impacts of carbon pricing on ratepayers. The detailed study encapsulates Federal Climate Legislation and Cap-and-Trade Design Principles.	http://puc.sd.gov/commission/Events/carbonforum/CarbonCapandTradeSummaryReport.pdf
Wisconsin	PSCWisconsin	\$30	N/A	None - PSCW shows clear signs of considering a CO ₂ price in its decision making. In studies commissioned to identify energy efficiency opportunities for the state, it is determined prudent to assume climate policy in planning. The likelihood of CO ₂ prices were also considered in the 2010 proceedings investigating the Commission's motion to review excess capacity in the market.	https://psc.wi.gov/reports/documents/WIPotentialFinal.pdf http://wicastmetals.com/Ind%20%20Customers%20Comments%20Part%202.pdf
Illinois	ICC	\$10 to \$30	N/A	None - CO ₂ price was included as part of the ICC's evaluation of the cost report of the Taylorville Energy Centre. As a clean coal facility, costs of avoided GHG emissions would be a critical input to determine the levelized cost of energy output.	http://www.icc.illinois.gov/electricity/tenaska.aspx
Iowa	IUB	\$14 to \$34	2009	Directive - As directed in January 2009, IPL analyzed the impact of CO ₂ pricing on supply options in its application of the proposed Sutherland Generating Station 4.	http://www.state.ia.us/government/com/util/docs/misc/EE/EE_GA_Jan2009.pdf

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Missouri	MPSC	15 in 2013 rising to \$53 by 2030	2013	Guideline - As part of its efforts to benchmark the price for RECs in Missouri, the MPSC has reduced the renewable energy cost by the avoided cost of fuel and avoided cost of GHG emissions. It has been found appropriate to account for all costs and benefits, but more guidance is needed. It is widely expected that GHGs will be subject to a cap at some point, enabling a market structure to price emissions. In 2010, it was recommended by the UCS that the MPSC incorporate the most recently available forecast of emissions prices and to periodically update them. The most recent IRP filings (2013) include these GHG price considerations.	https://www.efis.psc.mo.gov/mpsc/commoncomponents/viewdocument.asp?DocId=935486220 http://www.synapse-energy.com/Downloads/SynapseReport.2013-08.EJ.KCP&L-GMO-IRP-Updates.13-070.pdf
Michigan	MIPSC	\$15	N/A	None - Included in the Feb 2013 MIPSC renewable energy standard compliance report, a modest CO ₂ price is included in evaluating the costs of new coal generation versus weighted average renewable technologies.	https://www.michigan.gov/documents/energy/UCS_final_response_to_Question_3_419486_7.pdf
Indiana	IURC	\$17 in 2020 rising to \$44 in 2032	N/A	None - As included in applications before the IURC to gain approval for coal plant retrofits to mitigate other air emissions, Duke Energy bases its planning on market assumptions that include a carbon price.	https://indianadg.wordpress.com/category/indiana-utility-regulatory-commission-iurc/