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ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER AGENCY	)	
	)	
PETITION FOR APPROVAL OF INITIAL PROCUREMENT PLAN	)	**DOCKET #09-0373**
	)	

RESPONSE TO THE ILLINOIS POWER AGENCY'S PROCUREMENT PLAN FILED SEPTEMBER 30, 2009 BY TENASKA TAYLORVILLE, LLC

Tenaska Taylorville, LLC ("Tenaska Taylorville") respectfully submits this response to the Procurement Plan ("Procurement Plan") and the Illinois Power Agency Petition for Approval of 220 ILCS 5/16-111.5(d) Procurement Plan filed on or about September 30, 2009 pursuant to Section 16-111.5 of the Public Utilities Act ("PUA"), 220 ILCS 5/16-111.5.

I. INTRODUCTION

Tenaska Taylorville is the Managing Member of Christian County Generation, L.L.C., which is developing the Taylorville Energy Center in Christian County, Illinois. The Taylorville Energy Center and/or its oxygen supplier will require auxiliary power in amounts that are being determined pursuant to the front end engineering and design (FEED) study currently being conducted pursuant to the Illinois Clean Coal Portfolio Standard Law (PL-95-1027). Tenaska Taylorville files this Response from its perspective as a prospective electric customer in Illinois.

Tenaska Taylorville and affiliated companies (collectively, "Tenaska") is a group of privately held companies with more than 20 years of power plant development and energy marketing experience. Tenaska has developed and constructed approximately 9,000 megawatts (MW) of generation representing more than $10.3 billion in financing and capital investment. Tenaska Marketing Ventures, a Tenaska affiliate, is among the top 10 daily marketers in the North American natural gas market, selling or managing more than 2.04 trillion cubic feet of natural gas in 2008. This volume is equivalent to approximately 8.6% of total U.S. natural gas consumption. Tenaska also has a power marketing affiliate, Tenaska Power Services, that operates a 24-hour trading floor dealing primarily with sales of physical electric power, and in 2008 managed more than 20,000 megawatts of electric generating capacity in the U.S. and Canada.

Tenaska has significant investments in wind generation and in a rooftop solar company and is listed by the Natural Resources Defense Council (NRDC) as having the best greenhouse gas emissions recored amount companies in the U.S. that generate power from fossil fuels.

RESPONSE TO PROCUREMENT PLAN

Tenaska Taylorville files this Response for the limited purpose of commenting on factors that should be taken into account in considering whether the Procurement Plan should provide for long term contracts. Tenaska Taylorville takes no overall position on whether the Procurement Plan should be approved, whether any provision for long term contracts should be limited to renewables or what details should be provided in the Procurement Plan concerning any long term contracts.

Tenaska's experience as a developer of capital intensive energy projects is that long term contracts are necessary to promote investment in new electric generating projects, and we believe that Illinois electric customers will greatly benefit if the Procurement Plan encourages new generating projects in and around Illinois. Adding to the supply of generating capacity in the Illinois area will have a significantly beneficial effect on market prices ("Market Savings") in two ways. First, the additional capacity will reduce the amount and price of capacity that Commonwealth Edison Company and other load serving entities will be required to obtain through the PJM Reliability Pricing Model (RPM) program.

Second, the energy generated from new projects will reduce the spot market price of energy for load serving entities throughout Illinois in many hours by changing the marginal unit that is setting the market price. In some hours the additional energy will result in the marginal unit being a combined cycle natural gas plant rather than a combustion turbine peaking plant. In some hours the additional energy will result in the marginal unit being a coal plant rather than a combined cycle natural gas plant. In some hours the additional energy will result in the marginal unit being a relatively new and efficient coal plant rather than a relatively old and inefficient coal plant. In some hours the additional generation will not result in a change in the marginal unit. But in each hour that the additional generation results in a different unit with a lower variable cost being the marginal unit, the entire market price is reduced by the decrement in the variable cost of production of the marginal unit in that hour. So even though the unit price reduction could be quite small, the overall price effect is very significant because it applies to the entire market rather than just to the amount of the additional generation. These market savings accrue regardless of the contract price for the new capacity.

As part of the Facility Cost Report required by the Illinois Clean Coal Portfolio Standard Law, Tenaska Taylorville is preparing an analysis of the capacity and energy market savings that would result from the addition of the Taylorville Energy Center in the PJM market in Illinois. This draft analysis is subject to change based on the final performance estimates that are determined by the FEED study. But the results based on current estimates show that the addition of 500MW of net capacity would result in total capacity and energy market savings of approximately $840 million over the first five years of operation of the Taylorville Energy Center. The amount of savings for different types of generation would vary depending on the projected capacity factor, but this provides an illustration of the magnitude of market savings that could be achieved by adding new generation with a variable cost of production that is sufficiently low to keep gas fired units and less efficient coal fired units from setting the market price during many hours of the year.

Tenaska's internal estimate of the market energy savings (the overall reduction in market prices resulting from the presence of the generating resource in the dispatch stack) in 2015 from the addition of 100 MW of new wind capacity with a 30% capacity factor is $15 million per year. Even though it has a low capacity factor, wind generation is particularly effective in pushing higher variable cost units out of the dispatch stack because of its low variable cost of production.

A second consideration that we believe is important in considering whether new generation should be encouraged (and is therefore a point in favor of long term contracts) is that new generation will have the effect of displacing generation by older plants with higher

pollutant emission rates than the new generation. Emission reductions that are achieved in this manner could reduce the need for more costly methods of reductions, thereby benefiting electric customers. As part of the Facility Cost Report, Tenaska Taylorville will provide an analysis of the net amount of CO2 reductions that would be achieved in calendar year 2017 by the Taylorville Energy Center. A draft of this analysis is attached as Exhibit 1. The analysis concludes that in 2017 the Taylorville Energy Center will result in net CO2 reductions of 660,000 tons but that a similar amount of additional wind capacity located in Taylorville and having a 30% capacity factor would result in net CO2 reductions of 1.32 million tons. Most of these reductions will be achieved by lowering the capacity factors of older coal fired plants in Northern Illinois. The analysis is focused on CO2 emissions, but there is similar or greater net reduction for criteria pollutants such as SO2, NOx, CO, mercury and particulates.

CONCLUSION

Tenaska Taylorville respectfully requests that the Illinois Commerce Commission make note of Tenaska Taylorville's comments.

Respectfully Submitted,

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October 26, 2009

Exhibit 1

DRAFT CO_2 Secondary Impact Analysis

TAYLORVILLE ENERGY CENTER

October 2009

CO_2 Secondary Impact Analysis

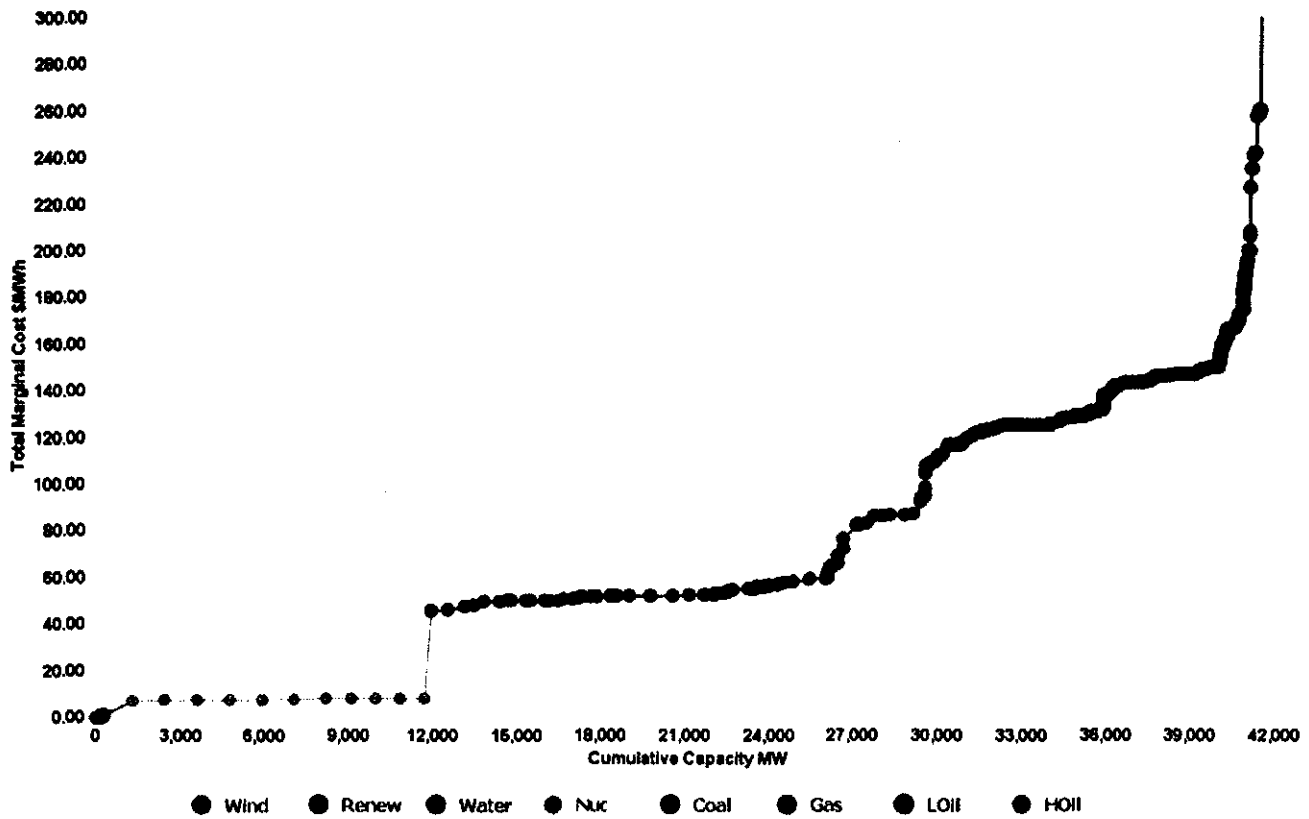
Taylorville Energy Center

Executive Summary

To accurately determine the CO_2 impact of the Taylorville Energy Center (TEC), the project cannot be viewed in isolation. The addition of the TEC to the power supply mix will cause older, less efficient generating units to dispatch less frequently, resulting in CO_2 emissions from those units that are lower than they would have been without the TEC. The analysis discussed below models the impact that the operation of the TEC would have on CO_2 emissions in the surrounding area in the year 2017. It shows that there would be a **net CO_2 reduction** of **660,000 tons** in that year as a result of the TEC.

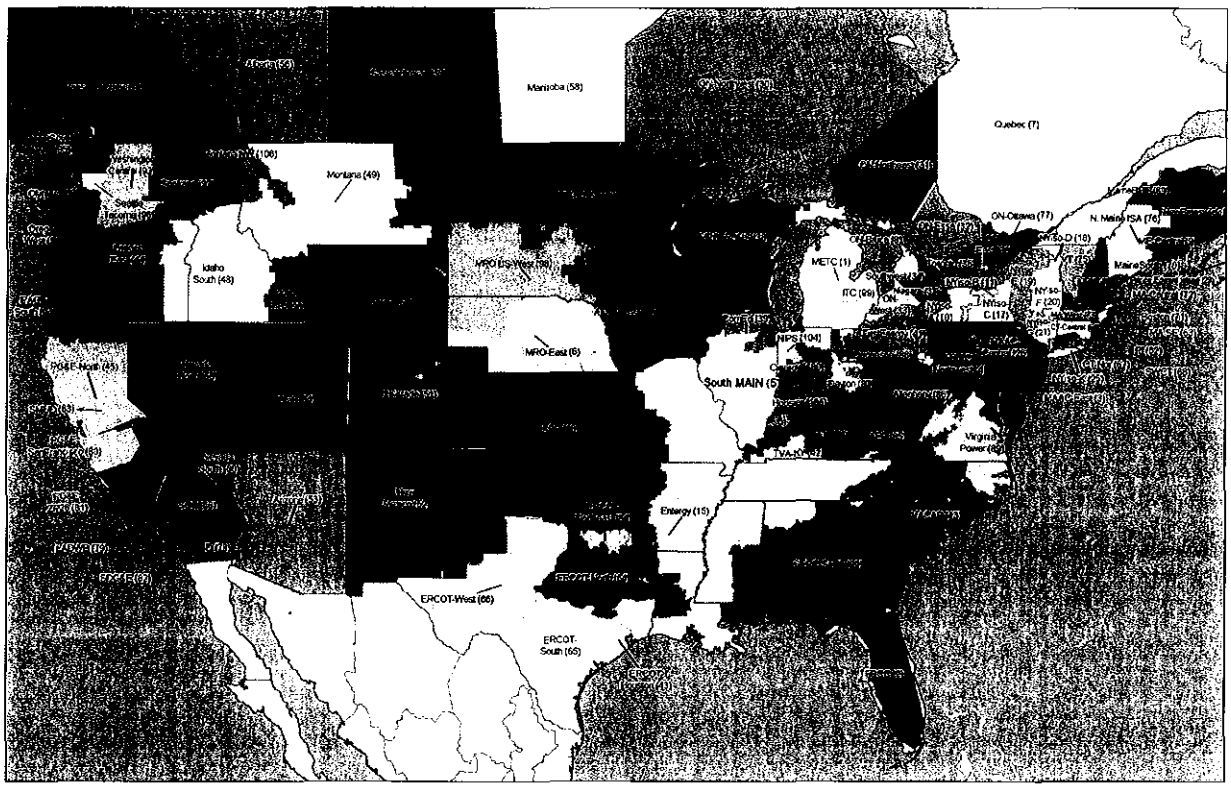
Dispatch Analysis

In order to support its power trading business, project development business and energy asset acquisition business, Tenaska uses a fundamental dispatch model called Aurora, which is commercially available from EPIS, Inc. Aurora and similar models are used by many participants in the energy sector. Dispatch models use information on the generating units in each of a number of zones to build up a local supply curve for electricity, like the one shown in the figure below. The supply curve is then compared with the forecast electricity demand in that zone to determine the power price. There are potential transfers of electricity between zones that make the solution more complicated, and the specific operating constraints of different types of units must also be met when building the supply curve from hour to hour. In general, the model simply solves for the least-cost clearing price for power in each zone. The prices are determined on an hourly basis, and the results are typically rolled up to a monthly or annual level.



The Aurora model is packaged with an input database containing information on all of the generating units in North America, as well as information on regional demand and the transmission links between zones. Tenaska uses additional data sources and its proprietary market information to improve the data within this default database.

The Aurora model topology includes 108 zones across the U.S. and Canada as shown in the figure below. The TEC will be located in the South MAIN zone, which covers Southern Illinois and parts of Missouri. This zone is well connected to many surrounding zones, and the model solution includes the potential transfer of electricity between South MAIN, northern Illinois (ComEd), and other areas of the South and Midwest. For the analysis described here, these transfers impact the local energy requirements in South MAIN, but the secondary effects of the TEC's operation are measured only by changes in the operation of generating units in the South MAIN and ComEd zones.



Using this approach and topology, Tenaska determined the impact that the operation of the TEC would have on CO_2 emissions in the surrounding area. The main idea is that although the TEC will emit CO_2 in its operations, it displaces the need to run other older, less-efficient coal-, gas-, and oil-fired generating units which have higher CO_2 emission rates. These older, less-efficient plants are pushed farther out on the supply curve and run less often. Thus the net CO_2 emissions attributable to the TEC within the interconnected grid system are less than the emissions of the plant when viewed in isolation, and this results in an understatement of estimated CO_2 emissions reductions.

This synoptic approach affords a greater view of the whole impact of the facility, and is conceptually consistent with the methodology used for the Clean Development Mechanism adopted by the U.N. Framework Convention on Climate Change. It should be noted that the Clean Development Mechanism

itself is governed by a complicated set of protocols which Tenaska did not attempt to replicate in this analysis, but the intent and overall design is the same. A more complete understanding of the effects of a generation project on greenhouse gas emissions can be obtained by analysis of its effects on other generators within the grid.

The details of the analysis are as follows:

- An hourly model forecast for the calendar year 2017 was completed.
- For each hour modeled, it is possible to identify the output from the TEC, and the marginal unit required to serve load in Illinois. The marginal unit is determined by identifying the last megawatt required to serve load in both the South MAIN and ComEd areas as well as the direction of power flow to and from South MAIN and ComEd. When power is flowing from ComEd to South MAIN, the unit in ComEd is the marginal unit in Illinois, otherwise it is the unit in South MAIN.
- The marginal generating unit has a known fuel type (most often coal or gas) and a known heat rate (the property of the unit that measures its efficiency in terms of how much fuel is burned in any given hour to produce one megawatt of electricity).
- When the TEC is operating, it displaces megawatts that would otherwise need to be produced by a generator at a position just beyond the location of the marginal unit on the supply curve. Tenaska's method conservatively assumes that the properties of the displaced unit are the same as the modeled marginal unit.
- Thus, knowing the output from the TEC and the properties of the marginal unit, the amount of CO_2 displaced in any hour can be calculated as

$$\text{Displaced CO2 (MM tons)} = \frac{\text{Taylorville Output (MW)}}{\text{(MW)}} * \frac{\text{Marginal Unit Heat Rate (MMBtu)}}{\text{(MMBtu)}} * \frac{\text{Marginal Unit CO2 Rate (lbs)}}{\text{2000 (lbs)}} * \frac{\text{1 ton}}{\text{10\^6 tons}} * \text{1 MM tons}$$

- The total CO_2 displaced by theTEC's operation is simply the sum of this displacement calculated for each hour modeled.
- Similarly, the total CO_2 emissions from the TEC itself can be totaled from the hourly model output, and this total can be compared to the amount of CO_2 displaced by the unit's operation.

For the TEC, the tallied emissions from this Aurora-model methodology are exclusive to the power plant operation, without inclusion of the emissions produced in the gasification process to supply the plant's synthetic natural gas fuel (SNG). Tenaska completed additional calculations to estimate the emissions attributable to the auxiliary loads for that portion of the SNG production that is ultimately burned in the power plant.[1]

Model Results

[1] About 3.7% of the emissions from the plant operation are attributable to the auxiliary load that the plant carries to support the gasification process.

A summary of the model results for the TEC is shown in the following table. Over the course of the year, Tenaska projects that the unit will operate at a 47%[2] capacity factor and will emit roughly 1.26 MM tons of CO_2. However, at the same time the unit prevents about 1.92 MM tons of CO_2 from being emitted by other facilities, either older and less-efficient gas generating units or coal units with higher CO_2 emission rates. The TEC is particularly effective at displacing coal generation because the must-run portion of the facility that operates around-the-clock to support the coal gasification process also produces approximately 160 MW of additional energy that displaces coal in the off peak hours. The must-run portion of the plant operates even in off-peak hours when coal units are marginal.

Projected Operations for 2017	
Capacity Factor	47%
Total CO2 Emissions	1.26 MM Tons
Total CO2 Displacement	1.92 MM Tons
Net CO2 Impact	-0.66 MM Tons
Percent of Time Displacing Coal	70%
Percent of Time Displacing Gas	30%

Appendix A shows the 20 units (or groups of units) which were projected to be displaced most often over the course of the year 2017.

A similar analysis was completed for a standard gas-fired combined-cycle unit and a wind unit, each with the same maximum operating capacity as the TEC.[3] The intent was to determine how effective the TEC is at reducing the total CO_2 emissions in Illinois area compared to other technologies. Results are shown in the table below.

[2] The 47% capacity factor is based on the assumption that Taylorville will be self supplying the auxiliary loads associated with the SNG Island, the Air Separation Unit and CO_2 compression, which would reduce the net output to be exported to the grid to be approximately 500 MW. If it is determined to supply these auxiliary loads with purchased power, the net output of the Facility is expected to be somewhat over 700 MW, and the capacity factor would increase significantly since all of the increase would come from the 1x1 must run portion of the facility. However, this should not affect the net emissions reduction analysis because, if TEC is not supplying he referenced auxiliary loads, other units in the market will be operated to do so.

[3] The standard combined-cycle unit was modeled with a 6,800 Btu/KWh heat rate and a variable operating cost of $3.32/MWh. Typical start-up costs for a 7FA-type combined-cycle unit were included, the same as other combined-cycle units in the model. Fifteen percent of the maximum output is in the form of duct firing with a heat rate of 9,100 Btu/kWh.

Projected Operations for 2017			
	Taylorville	**Combined-Cycle**	**Wind**
Capacity Factor	47%	10%	30%
Total CO2 Emissions	1.26 MM Tons	0.18 MM Tons	0 Tons
Total CO2 Displacement	1.92 MM Tons	0.36 MM Tons	1.32 MM Tons
Net CO2 Impact	-0.66 MM Tons	-0.19 MM Tons	-1.32 MM Tons
Percent of Time Displacing Coal	70%	44%	81%
Percent of Time Displacing Gas	30%	56%	19%

The TEC is more effective at reducing CO_2 emissions than a standard combined-cycle unit because it runs more often. The TEC is modeled as two segments. First, there is a must-run component of the plant that runs at a 92% capacity factor, in order to support the expected operations of the gasification facility. This segment is associated with the plant operating with only one of its two combustion turbines. The second and larger segment is modeled as the incremental gas burn required to move the unit from its minimum output to its maximum output. This only occurs if the hourly price in the Aurora model is greater than the incremental cost of increasing the output, which in this analysis led to a 25% capacity factor for the second segment. The weighted average of the two segments leads to a 47% capacity factor for the unit.

In contrast, the standard combined-cycle unit is not required to run at minimum output in all hours of the year, and will only operate as it is economic to do so. The model contains commitment logic to determine the best pattern of minimum output and maximum output to create the most value for the plant as hourly prices change throughout the day. In this study, a 10% capacity factor was determined for the standard combined-cycle unit.

Thus, the additional run time associated with supporting the gasification process is in the end a benefit for the CO_2 emissions in the area. Part of the TEC is always operating, even in overnight hours when higher-emitting coal plants are setting the price and standard gas combined-cycle units are not profitable to operate. This enhances the CO_2 displacement that the TEC achieves.

Compared to a wind generation farm of equal capacity, the TEC is not as effective at reducing net CO_2 emissions. Again, the energy produced by the wind farm versus the energy produced by the TEC is an important factor. While the maximum wind output was modeled the same as the TEC, at 483 MW, it is necessary for the total energy produced by the wind farm to reflect the inherent variability of the wind. In this study, a 30% capacity factor was modeled, which is typical of high-end wind turbines in the

Midwest. Since the wind generation farm displaces other CO_2 emitting sources only when the wind is blowing, it is possible that the actual CO_2 displacement for the wind generation farm could be significantly different than what has been modeled due to the actual total generation as well as the generation profile.

Summary

These analyses demonstrate the importance of viewing the change in emissions of the entire system, rather than focusing on the emissions from one plant in isolation. It is clear that when viewed in this context, the operations of the TEC will indeed improve the CO_2 emissions in the surrounding regions by introducing a supply of low-cost, clean-coal generation.

Appendix A

For each hour modeled for the Taylorville CO_2 secondary impact analysis, it is possible to identify the marginal unit required to serve load in Illinois. The marginal unit is determined by identifying the last megawatt required to serve load in both the South MAIN and ComEd areas as well as the direction of power flow to and from South MAIN and ComEd. When power is flowing from ComEd to South MAIN, the unit in ComEd is the marginal unit in Illinois; otherwise it is the unit in South MAIN.

The list below identifies the 20 units (or group of units) which were projected to be marginal most often in 2017.

Crawford(IL) 7	23.5%	Cook	IL	Coal	1958
Small Unit Other 13000 39*	11.5%		IL		
State Line Energy ST4**	10.8%	Lake	IN	Coal	1955
Small Unit NI-Coal 9000 39*	7.5%		IL	Coal	
Powerton 5	6.7%	Tazewell	IL	Coal	1972
Kincaid Generation LLC 1	3.9 %	Christian	IL	Coal	1967
Will County 3	3.6%	Will	IL	Coal	1955
Joliet 29 8	3.4%	Will	IL	Coal	1965
Will County 4	3.1%	Will	IL	Coal	1955
Rockford II Energy Center GT3	2.8 %	Winnebago	IL	Gas	2002
Waukegan 7	1.7%	Lake	IL	Coal	1952
Crawford (IL) 8	1.7%	Cook	IL	Coal	1958
Joliet 9 6	1.6%	Will	IL	Coal	1959
Kincaid Generation LLC 2	1.4 %	Christian	IL	Coal	1967
PPL University Park Power Project 7	1.2%	Will	IL	Gas	2002
Cordova Energy Center CC	1.1%	Rock Island	IL	Gas	2001
Fisk Street 19	1.1%	Cook	IL	Coal	1959
Small Unit NI-Gas 10000 39*	0.9%		IL		
Joliet 29 7	0.8%	Will	IL	Coal	1965

Calumet Energy Team LLC CT12	0.7%	Cook	IL	Gas	2002
Other	10.8%				

*The "Small Units" are located in Northern Illinois

** While physically located just across the state line in Indiana, the State Line Energy facility is located in the Commonwealth Edison control area and is modeled as such in Aurora

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NOTICE OF FILING

To: All Persons on the Attached Service List

Please take notice that on October 26, 2009, the undersigned has caused to be filed with the Clerk of the Illinois Commerce Commission, 527 E. Capitol Ave., Springfield, Illinois 62701, Tenaska Taylorville, LLC's Response to the Illinois Power Agency's Procurement Plan filed September 30, 2009 by Tenaska Taylorville, LLC, copies of which are hereby served upon you.

Respectfully submitted,

Tenaska Taylorville, LLC

By: _____
One of its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October, 2009, copies of the Notice of Filing, together with copies of the documents referred to therein, have been served upon all parties on the attached service list by first-class mail, postage pre-paid.

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