

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**Pirkey prudence review including decision  
to retire and costs passed through Fuel  
Adjustment Clause from January 2019  
through March 2023**

**DOCKET NO. U-37067**

**FIRST SET OF DATA REQUESTS ON BEHALF OF THE COMMISSION STAFF**

**Question Staff 1-30:**

Mr. Brice notes that part of the decision to retire Pirkey included the CCR/ELG expenditures that would be mandated by the EPA. Provide detail the activities and associated capital expenditures by year that would have been necessary for compliance with CCR Rule and ELG.

**Response Staff 1-30:**

See Staff 1-30 Attachment 1 for the projected capital costs for CCR and ELG compliance options which were included in the 2020 analysis.

SWPCO CCR/ELG Compliance Strategy

**PIRKEY Total Plant**

Draft (8/26/20) - Provided by Art Rentzch on 8-26-20 5:28 pm email RE: CCR Only and CCR/ELG Cash Flows

## General Notes

- (1) Scenario 3 Compliance / Retirement Date based on PROPOSED ELG rule and may change  
(2) Cost estimates in \$M Direct  
(3) Scenario 1 revised to account for elimination of pond and liner

		Scenario 1	Scenario 2	Scenario 3	Scenario 1 Cash Flow							Scenario 3 Cash Flow							
		CCR + ELG Plan	CCR Rule Retire Option	ELG Retire (CCR only) Plan	2020	2021	2022	2023	Total			2020	2021	2022	2023	2027	2028	Total	
Pirkey	Compliance Cost (capital)	\$35 (-20%/+30%)	\$0	\$13 (-30%/+50%)	\$5.64	\$4.70	\$19.87	\$4.89	\$35.10			\$1.61	\$1.04	\$10.76				\$13.42	
	Pond Closure (fuel /ARO)	\$2 (-20%/+30%)	\$2 (-20%/+30%)	\$2 (-20%/+30%)	\$0.26	\$0.47	\$0.67	\$1.10	\$2.50								\$2.50	\$2.50	
	Incremental ARO (new pond)			\$4.5 (-30%/+50%)					\$0.00							\$1.00	\$3.50	\$4.50	
	Total Direct	\$37.6	\$2.0	\$20.4	\$5.89	\$5.17	\$20.55	\$5.99	\$37.59			\$1.61	\$1.04	\$10.76	\$0.00	\$1.00	\$6.00	\$20.41	
	Indirects Capital	\$12.1		\$3.6	\$1.12	\$1.65	\$5.87	\$3.47	\$12.12			\$0.23	\$0.37	\$3.03				\$3.64	
	Indirects ARO/Fuel	\$0.6	\$0.6	\$1.6	\$0.06	\$0.11	\$0.16	\$0.25	\$0.58							\$0.23	\$1.38	\$1.61	
	Total	\$50.3	\$2.6	\$25.7					\$50.29									\$25.67	
	End PK Operations	No deadline	~Jun 2028	12/31/2028															
	Compliance/Retire Date (PROPOSED, not final)	10/15/2024 compliance	10/17/2028 retire	12/31/2028 retire															
	Notes	Assumes EPA grants request to extend CCR Compliance Date	End PK operations date to allow pond closure BEFORE 10/17/28 deadline (remove ash/groundwater testing)  Retire date for sites with ponds > 40 acres	Complete pond closure within 5 years AFTER ending PK operations															
	Estimate Fidelity		Business Sensitive																
	Class V (-50%/+100%)		SWPCO Share (86%)																
Class IV (-30%/+50%)																			
Class III (-20%/+30%)																			
Scenario 1 Cash Flow (CCR+ELG Plan)					Scenario 3 Cash Flow (CCR Only Plan)														