Empire District Electric

MPSC Environmental Regulations Overview

Case No. EW-2012-0065



October 26, 2011

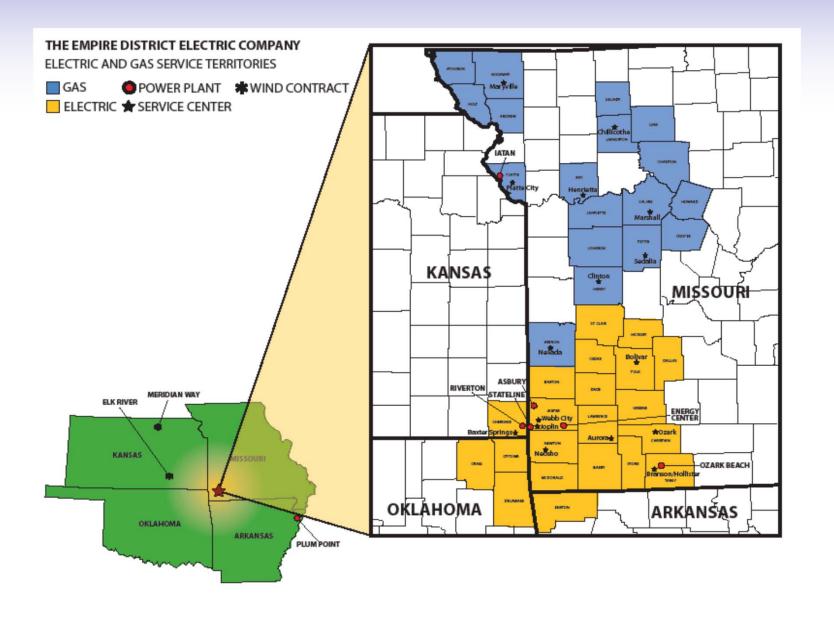


Presentation Overview

- Empire Overview
- Empire 5-Year Emissions
- Cross State Air Pollution Rule (CSAPR) and Compliance
- Power Plant Mercury Air Toxics Standards and Compliance
- Regional Haze (MDNR and KDHE) and Compliance
- 2010 SO2 National Ambient Air Quality Standard (NAAQS) and Compliance
- Questions



Empire's Service Territory





Empire Capacity

Empire District's generation facilities and Purchase Power Agreements are listed below:

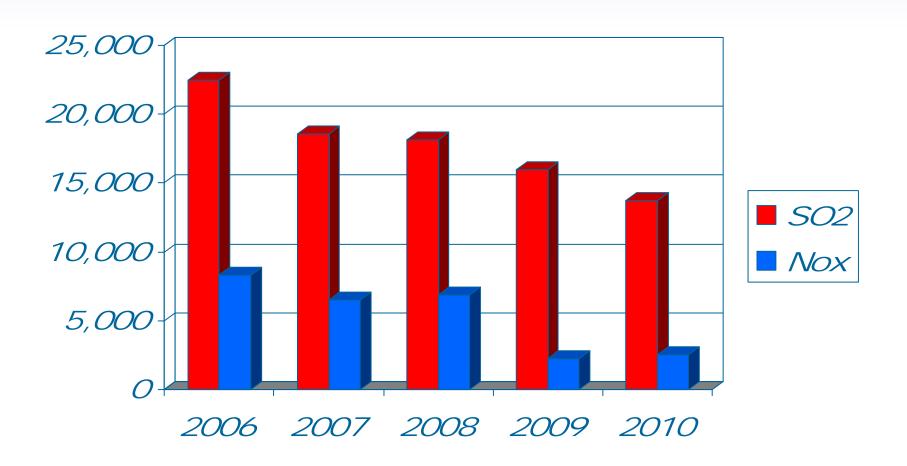
Unit	Energy Source	Rating MW	Regulatory Regime
*Asbury	Coal	207	Missouri
Iatan I & II (12% Ownership)	Coal	187	Missouri
Plum Point (7.52% Ownership)	Coal	50	Arkansas
*Riverton	Coal and	283	Kansas
	Nat gas/ Oil		
*Energy Center	Nat Gas/Oil	262	Missouri
*State Line	Nat Gas/Oil	94	Missouri
State Line (60% Ownership)	Nat Gas	300	Missouri
*Ozark Beach	Hydro	16	Missouri
Owned Capacity		1,399	
Plum Point PPA	Coal	50	Arkansas
**150 MW Elk River Wind Farm PPA	Wind	7	Kansas
**105 MW Meridian Way Wind Farm PPA	Wind	8	Kansas
PPA Capacity		65	
TOTAL Capacity		1,464	
		IF 7 TIN	District Constitution

^{*}Wholly owned Facilities



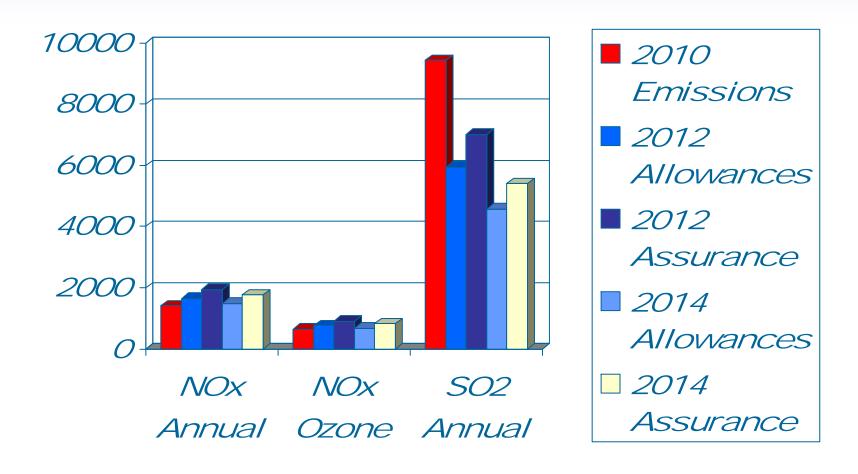
^{**}Capacity Restriction for wind

Empire Emissions (tons)



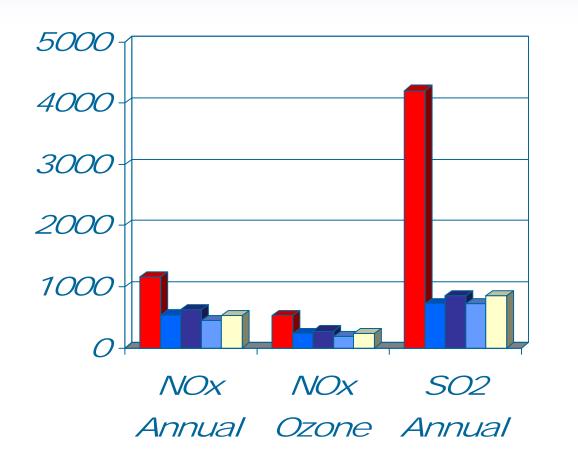


CSAPR and Compliance (MO)





CSAPR and Compliance (KS)





- 2012
 Allowances
- 2012 Assurance
- 2014
 Allowances
- 2014
 Assurance



CSAPR and Compliance (Con't)

- Empire will have additional NOx allowances in MO and short in KS
- Empire is short of SO2 allowances in both MO and KS
- Compliance Options for Riverton Units 7 and 8
 - Fuel blend changes
 - Fuel switching
 - Purchase of allowances
 - Retirement of units
- Compliance Options for Asbury
 - Fuel switching
 - Retrofit unit with scrubber for SO2 (unit already has SCR for NOx)
 - Retirement of unit



Power Plant Mercury and Air Toxics Rule

- latan Units 1 and 2 No impact anticipated
- Asbury Compliance Options
 - Scrubber or other SO2 control, baghouse for PM and PAC for Hg control
 - Retirement of unit resulting in replacement capacity
- Riverton Units 7 and 8 Compliance Options
 - Retrofit with emission controls not feasible
 - Fuel switching
 - Retirement of Units
- Plum Point No impact anticipated



Regional Haze (MDNR and KDHE) and Compliance

MO

Iatan Units 1 and 2 and Asbury – No impact

KS

Riverton Units 7 and 8 – No impact at this time

AR

No impact anticipated at Plum Point



2010 SO2 National Ambient Air Quality Standard (NAAQS) and Compliance

MO

- No impact anticipated at latan Units 1 and 2
- No impact anticipated in next 5 years at Asbury at this time but expect to impact at later time

KS

No impact anticipated in next 5 years at Riverton Units 7 and 8 but expect to impact at later time

AR

No impact anticipated at Plum Point



Compliance Plans/Cost/Timeframe

- No additional controls expected at latan Units 1 and 2 or Plum Point
- Asbury
 - Current IRP says retrofit Asbury at cost ranging from \$120M \$180M is least cost
 - Scrubber for SO2
 - Baghouse for PM
 - PAC injection for Hg
 - 2015 timeframe
 - Still evaluating
- Riverton
 - Multitude of options
 - Fuel blend changes
 - Fuel switching
 - Retirement of units
 - Will not retrofit with scrubber, SCR, baghouse, PAC as it is not cost effective
 - Still evaluating



Questions??

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