

Exhibit A Baseline Projections

SO2 Allowance Study for Empire North Antelope as Primary Coal

Year	Asbury			Riverton 39			Riverton 40			Iatan I & II 2010			Total Emitted	Total Banked
	Received	Emitted	Banked	Received	Emitted	Banked	Received	Emitted	Banked	Received	Emitted	Banked	Total Emitted	Total Banked
Original Bank			46290			1633			1339			243		49262
Start			46290			1633			1339			243		49262
2004	6975	5164	48101	1039	2422	250	1764	839	2264	1945	3275	-1087	11700	49528
2005	6975	6395	48681	1039	2838	-1549	1764	940	3088	1945	3145	-2287	13318	47933
2006	6975	6034	49622	1039	2944	-3454	1764	975	3877	1945	2893	-3235	12846	46810
2007	6975	5905	50692	1039	2856	-5271	1764	946	4695	1945	3064	-4354	12771	45762
2008	6975	6029	51638	1039	2833	-7065	1764	938	5521	1945	2846	-5255	12646	44839
2009	6975	6045	52568	1039	2639	-8665	1764	874	6411	1945	2513	-5823	12071	44491
2010	3493	6332	49729	521	2838	-10982	883	940	6354	973	3930	-8781	14040	36320
2011	3493	6203	47019	521	2944	-13405	883	975	6262	973	3774	-11581	13896	28295
2012	3493	6624	43888	521	2856	-15740	883	946	6199	973	3471	-14080	13897	20267
2013	3493	6640	40741	521	2833	-18052	883	938	6144	973	3677	-16784	14088	12049
2014	3493	7287	36947	521	2639	-20170	883	874	6153	973	3415	-19226	14215	3704
2015	2329	6927	32349	347	2838	-22661	589	940	5802	648	3016	-21594	13721	-6104
2016	2329	7095	27583	347	2944	-25258	589	975	5416	648	3930	-24876	14944	-17135
2017	2329	7219	22693	347	2856	-27767	589	946	5059	648	3774	-28002	14795	-28017
2018	2329	7235	17787	347	2833	-30253	589	938	4710	648	3471	-30825	14477	-38581

Phase I
CAIR

Phase II
CAIR

Assumptions:

* CAIR passes as currently written; starting in 2010 allowances received are worth 1/2 value and starting in 2015 allowances received worth 1/3 value, allowances prior to 2010 retain full value.

Sulfur Content

- * PRB Coal 0.22
- * Blend Coal 3.50
- * Tire Derived Fuel 1.21
- * Pet Coke - not included in analysis for Riverton 39 & 40
- * Emission Factors based on AP-42 emission factors and actual CEMS data.
- * 80 MW of coal generation added at Asbury in 2010, 2012, 2014, and 2016.

Additional Key Possibilities:

- Hg MACT is incorporated in CAIR or CSA w/ compliance in 2010.
 - Delay blend on 40 for 2 years.
 - Adds 2400 + allowances to 2012.
- WFGD install at Iatan by 2010.
 - Adds 2680 allowances per year in 2010 - 2014.
 - Adds 2900 allowances per year in 2015 - 2018.
- Baghouse & SI add at Asbury, blend not needed on 40.
 - Delay blend until retirement.
 - Adds 1200 allowances per year in 2008 - 2014.