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A Practical Look at Assumptions and Constraints for Steady State Modeling of sCO<sub>2</sub> Brayton Power Cycles



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### Introduction



- Recent interest in sCO<sub>2</sub> cycles has led to a large number of systems modeling studies for a variety of heat sources
- Cycle configurations are still being optimized with respect to:
  - Heating and cooling sources being utilized
  - Overall plant economics for commercialization
  - Development of cycle components for larger scales and more severe operating conditions
- Need for consistency in techno-economic sCO<sub>2</sub> cycle studies
  - Ease of comparison between sCO<sub>2</sub> cycle arrangements, and against competing cycles (e.g. steam)
  - Minimize effects of unrelated technologies on sCO<sub>2</sub> plant performance
- Assumptions and constraints for steady-state modeling and technoeconomic analyses are recommended to allow for more meaningful results and comparisons
  - Based on NETL's and EPRI's collective expertise, and role as collectors and clearinghouses of sCO<sub>2</sub> power cycle information
  - Conference paper intended to be a living document please correct us!



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### **Presentation Outline**

- General Technical Assumptions
  - Ambient environment
  - Fuel/heat source specifications

### • Power cycle modeling assumptions

- Turbomachinery
- Heat exchangers
- Other equipment and assumptions

### Economic modeling

Capital cost estimates

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Economic Figures of Merit





### **Ambient Environment**



- A nominal plant location should be specified
  - Daily and seasonal ambient conditions affect plant performance
  - Location and environment affect economics
- Representative sites from NETL and EPRI studies:

| Site Conditions                                  | Montana       | Midwest ISO  | Kenosha, WI   |
|--|---------------|--------------|---------------|
| Elevation, m (ft)                                | 1,036 (3,400) | 0 (0)        | 184 (604)     |
| Barometric Pressure, MPa (psia)                  | 0.090 (13.0)  | 0.101 (14.7) | 0.0993 (14.4) |
| Average Ambient Dry Bulb<br>Temperature, °C (°F) | 5.6 (42)      | 15 (59)      | 15 (59)       |
| Average Ambient Wet Bulb<br>Temperature, °C (°F) | 2.8 (37)      | 10.8 (51.5)  | 13 (55)       |
| Design Ambient Relative Humidity, %              | 62            | 60           | 60            |
| Cooling Water Temperature, °C (°F)               | 8.9 (48)      | 15.6 (60)    |               |



## **Thermal Energy Source Specifications**

Solar Resource Variability (29.4 Annual Mean: 4640



- Coal
- Natural Gas
- Solar Irradiance
  - NREL Solar Prospector Tool
- Waste Heat
  - Gas turbine exhaust specs
    - Temperature, pressure, mass flow, composition

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- NETL NGCC studies
- Nuclear?

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Solar Resource maps.nrel.gov/prospector

| Coal              | Beulał  | Beulah-Zap Ro   |       | osebud PRB  |            | Illinois #6      |               |  |
|-------------------|---|---|-------|-------------|------------|------------------|---------------|--|
| Location          | Freedo  | Freedom, ND   |       | Montana     |            | Franklin Co., IL |               |  |
| Rank              | Lign  | ite   | Sub   | -bituminous |            | HV Bitur         | HV Bituminous |  |
|                   | As Rec'd.   | Dry   | As Re | c'd.        | Dry        | As Rec'd.        | Dry           |  |
| Proximate Analys  | is (weight %  | 6)  |       |             |            |                  |               |  |
| Moisture          | 36.08   | 0   | 25.7  | 77          | 0          | 11.12            | 0             |  |
| Ash               | 9.86  | 15.43   | 8.1   | 9           | 11.04      | 9.70             | 10.91         |  |
| Volatile Matter   | 26.52   | 41.48   | 30.3  | 34          | 40.87      | 34.99            | 39.37         |  |
| Fixed Carbon      | 27.54   | 43.09   | 35.7  | 70          | 48.09      | 44.19            | 49.72         |  |
| HHV (kJ/kg)       | 15,391  | 24,254  | 19,9  | 20          | 26,787     | 27,113           | 30,506        |  |
| LHV (kJ/kg)       | 14,804  | 23,335  | 19,1  | 95          | 25,810     | 26,151           | 29,444        |  |
| Ultimate Analysis | (weight %)  |   |       |             |            |                  |               |  |
| Carbon            | 39.55   | 61.88   | 50.0  | )7          | 67.45      | 63.75            | 71.72         |  |
| Hydrogen          | 2.74  | 4.29  | 3.3   | 8           | 4.56       | 4.50             | 5.06          |  |
| Nitrogen          | 0.63  | 0.98  | 0.7   | 1           | 0.96       | 1.25             | 1.41          |  |
| Chlorine          | 0.00  | 0.00  | 0.0   | 1           | 0.01       | 0.29             | 0.33          |  |
| Sulfur            | 0.63  | 0.98  | 0.7   | 3           | 0.98       | 2.51             | 2.82          |  |
| Oxygen            | 10.51   | 16.44   | 11.1  | 14          | 15.01      | 6.88             | 7.75          |  |
| 2 _08 48)         | Natu  | Natural Gas Volume Percentage                               |       | е           |            |                  |               |  |
| 2, 20110)         | Meth  | ane, CH <sub>4</sub>  | 93.1  |             | 93.1       | .1               |               |  |
|                   | Ethar   | e, C <sub>2</sub> H <sub>6</sub>                            |       | 3.2         |            |                  |               |  |
|                   | Propane, C <sub>3</sub> H <sub>8</sub> n-Butane, C <sub>4</sub> H <sub>10</sub> |   |       | 0.7         |            |                  |               |  |
|                   |   |   |       |             |            | 0.4              |               |  |
|                   | Carbo   | Carbon Dioxide, CO <sub>2</sub><br>Nitrogen, N <sub>2</sub> |       | 1.0         |            |                  |               |  |
|                   | Nitro   |   |       |             |            | 1.6              |               |  |
| Total             |   |   |       | 100.0       |            |                  |               |  |
| Sen Oct New In    | her l   |   |       |             | LHV        | Н                | HV            |  |
| i sek er wax n    | MJ/so   | cm (Btu/sc  | f)    | 34          | 4.71 (932) | 38.46            | (1033)        |  |
|                   | kJ/kg   | (Btu/lb)  |       | 47,4        | 54 (20,419 | 9) 52,581        | (22,625)      |  |



## **Turbine Model Constraints** *Inlet Temperature*



Primary

| Application                | Range (°C)     | Recommend (°C)                     | Limitation                          |
|----------------------------|----------------|------------------------------------|-------------------------------------|
| Direct sCO <sub>2</sub>    | 1100 –<br>1200 | 1150                               | Recuperator<br>materials            |
| Indirect Fossil-<br>fueled | 600 – 760      | 700 (near term)<br>760 (long term) | Primary heat<br>exchanger materials |
| Solar                      | 550 – 760      | 700                                | Solar salt stability                |
| Nuclear                    | 350 – 700      | 550                                | Nuclear safety                      |
| Waste Heat                 | < 230 - 650    | 550                                | Heat Source                         |
| Geothermal                 | 100 - 300      | 200                                | Heat Source                         |

- Inlet temperature dependent on heat source and application
- Limiting temperature constraint is *not* the turbine









- Inlet Pressure: Maximum of 35 MPa (5000 psi)
  - Consider effect on wall thickness for expensive materials
- Isentropic Efficiency: Function of size, speed, and type
  - Recommend 85% for radial turbines <30 MW</li>
  - Recommend 90% for axial turbines >30 MW
- Part Load Performance
  - Useful for off-design studies
- Outlet Conditions
  - Temperatures affect recuperator materials and cost
  - Pressures affect recuperator flow passage size/pressure drop



*Program on Technology Innovation: Modified Brayton Cycle for Use in Coal-Fired Power Plants.* EPRI, Palo Alto, CA: 2013. 1026811.

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### **Compressor Model Constraints**

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- Avoid critical point regime
  - 30 < T < 32 °C (86–90 °F), 7.27 < P < 7.47 MPa (1055–1085 psia)
  - sCO<sub>2</sub> property uncertainty (REFPROP for  $T_{cr} \pm 1$  °C)
  - Large property variations with temperature and pressure perturbations
- Inlet Temperature:
  - Minimum achievable with cooling scheme
- Inlet Pressure:
  - Optimal pressure increases with inlet temperature
- Isentropic Efficiency: Recommend 85%
- Part Load Performance: Similar to turbines



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## **Modeling Heat Exchangers**



- Recuperators
- Compressor Inlet Cooler / Inter-cooler
- Primary Heater





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### Recuperator Model Constraints Temperature, Pressure Drop



- <u>Temperature</u> No recuperator temperature should exceed 760 °C (1400 °F) limited by availability of structural alloys.
- <u>Pressure Drop</u> Lacking a detailed fluid flow model inside the recuperator:
  - High P (cold) side: 140 kPa (20 psid)
  - Low P (hot) side: 240 kPa (40 psid)





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The primary constraint on heat exchanger performance is cost. Cost rises quickly as specified effectiveness rises above 80% and very quickly as specified effectiveness rises above about 93%.

- Detailing the relationship between recuperator cost and performance will be critical to sCO<sub>2</sub> Brayton cycle development.
- In practice, recuperator effectiveness greater than 90% may not be justified.
- In any event, cost justification should be provided for recuperator effectiveness greater than about 93%.



**Compressor Inlet Cooler / Intercoolers** 

**Pressure Drop:** 

- CO<sub>2</sub> pressure drop: 15 kPa (2 psid) minimum
- Include piping losses for direct air-cooled coolers
- Cold-side pressure drop will be a significant auxiliary power load









### **Compressor Inlet Cooler / Intercooler** *Heat Transfer Performance*



- As with recuperators, cost will constrain inlet cooler and intercooler performance. For now, rely on steam-cycle power plant experience.
- Performance will also be constrained by ambient conditions. Lacking specific weather data:

| Cooling System Type                | Coolant Supply<br>Temperature        | Coolant Approach | Cold-side Aux. Power<br>(per MWth duty)   |
|------------------------------------|--------------------------------------|------------------|---|
| Water-cooling<br>wet cooling tower | 32°C (90°F)                          | 8 °C (13°F)      | Mech. Draft: 16 kWe<br>Nat. Draft: 10 kWe |
| Water-cooling<br>dry cooling tower | 43°C (110°F)                         | 8 °C (13°F)      | Mech. Draft: 16 kWe<br>Nat. Draft: 10 kWe |
| Hybrid wet/dry                     | 37°C (100°F)                         | 8 °C (13°F)      | Mech. Draft: 16 kWe<br>Nat. Draft: 10 kWe |
| Once-through water cooling         | 21°C (70°F)<br>North Sea: 5°C (39°F) | 8 °C (13°F)      | 9 kWe                                     |
| Direct, air-cooling                | Ambient dry bulb                     | 15 °C (28°F)     | Mech. Draft: 30 kWe                       |

Additional work is needed to analyze cycle cost/performance vs. coolant approach temperature.



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## **Primary Heater**

Primary heater design is critically dependent on the thermal resource being exploited:

- Nuclear
- Solar
- Fuel-fired
- "Waste" Heat





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Reactor coolant to sCO<sub>2</sub> heat exchanger is very similar to the high temperature recuperator. Lacking a specific primary heater model:

- Pressure drop: 200 kPa (30 psid)
- Effectiveness: 90%, no greater than 93%
- Temperature:

Metal temperature no greater than 760°C (1400°F)





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Model will generally use specific heat flux/coolant temperature

- Pressure drop: 200 kPa (30 psid)
- Effectiveness: Not applicable to model assumptions
- Temperature
- Metal temperature no greater than 760°C (1400°F)





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### Fuel-fired and "Waste" Heat



Meaningful results will require some detail in the primary heater design. Much of the thermal resource is at a temperature less than 540°C (1000°F), the temperature range where recuperation also occurs.

- Fuel-fired pressure drop (lacking a detailed fired heater design):
  - 700 kPa (100 psid) minimum
  - 3400 kPa (500 psid) conservative
- "Waste" heat sCO<sub>2</sub> pressure drop
  - 200 kPa (30 psid)
- Temperature:
  - no metal temperatures should exceed 760°C (1400°F)
- Gas-side to sCO<sub>2</sub> temperature difference (for heat transfer):
  - 28°C (50°F) minimum
  - 55°F (100°F) conservative
- Minimum gas-side temperatures:
  - 120°C (250°F) natural gas and low-sulfur fuels
  - 150°C (300°F) sulfur-containing flue gas
- There will be significant auxiliary power loads associated with gas-side pressure drop; typically 2% to 5% of gross power production.



### Lacking a specific piping design:

- Pressure Drop:
  - 3 m ( 10 ft) 34 kPa ( 5 psid)
  - 60 m (200 ft) 345 kPa (50 psid)
- Temperature drop
  - 3°C (5°F)
- Temperature
  - no metal temperatures to exceed 760°C (1400°F)





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### **Performance Metrics and Balance of Plant**



- Net sCO<sub>2</sub> *cycle* efficiency must include other cycle losses:
  - Generator: recommend 98.5% conversion efficiency
  - Gearbox (required below ~100 MWe): recommend 99% efficiency
  - Drive Motor (required for compressors if not turbine-driven):

| • | Recommended efficiency: | 95%   | < 1 MWe    |
|---|-------------------------|-------|------------|
|   |                         | 96.5% | 1 – 10 MWe |
|   |                         | 97%   | > 10 MWe   |

- Net *plant* efficiency must include other auxiliary plant loads beyond those required for the sCO<sub>2</sub> cycle
  - Air handlers, cooling systems (covered earlier), fuel handling, etc.
  - Refer to NETL's Quality Guidelines for Energy Systems Studies as a starting point
- Primary heater efficiency (fraction of thermal resource delivered to the sCO<sub>2</sub> cycle) should be reported, including heat losses



### **Economic Modeling**



- Purpose of the capital cost estimate
- Quality of the capital cost estimate
- Capital cost nomenclature
- Procedures to accumulate costs and calculate cost Figures of Merit





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### **Purpose of the Capital Cost Estimate**



#### Economic analysis parameters vary with purpose

#### • For pilot or demonstration projects:

- Include First-of-a-Kind (FOAK) equipment costs
- Higher process contingencies for scale-up uncertainties
- Higher financing costs (8-11%) due to increased risk
- For comparison of sCO<sub>2</sub> plant designs to competing technologies:
  - Scale process equipment to commercial scale, N<sup>th</sup>-of-a-Kind (NOAK) costs
  - Process contingencies consistent with mature technologies
  - Lower financing costs (7-9%) after technology risk has been lowered through demonstration

| Technology Status             | Process<br>Contingency |
|-------------------------------|------------------------|
| New Concept – limited data    | 40+%                   |
| Concept with bench scale data | 30-70%                 |
| Small Pilot scale data        | 20-35%                 |
| Full sized modules tested     | 5-20%                  |
| Commercial process            | 0-10%                  |
|                               |                        |







### **AACE International Cost Estimate Classifications**

| Estimate | Primary<br>Characteristic      | Secondary Characteristic |   |                                     |                             |
|----------|--------------------------------|--------------------------|---|-------------------------------------|-----------------------------|
| Class    | Level of Project<br>Definition | End Usage                | Methodology   | Expected Accuracy                   | Preparation<br>Effort Index |
| Class 5  | 0% - 2%                        | Concept<br>screening     | Capacity Factored,<br>Parametric Models,<br>Analogy | L: -20% to -50%<br>H: +30% to +100% | 1                           |
| Class 4  | 1% - 15%                       | Study or<br>Feasibility  | Equipment Factored or<br>Parametric Models          | L: -15% to -30%<br>H: +20% to +50%  | 2 to 4                      |

The cost to conduct a Class 4 cost estimate is typically \$200,000 to \$700,000.



## **Capital Cost Nomenclature**



| Ca<br>Ca                   | pital Cost<br>tegories     | Notes   |   |  |  |  |
|----------------------------|----------------------------|---|---|--|--|--|
| Α.                         | Bare Erected<br>Cost       | Total constructed costs of all on-site processing and power production units<br>and facilities that directly support production, to the battery limits. |   |  |  |  |
| В.                         | EPC Cost                   | Engineering and home office cos   | ts, overhead, and fees.                     |  |  |  |
| C.                         | Contingencies              | Costs associated with the uncert  | ainty in general project costs and scale-up |  |  |  |
| D.                         | Owner's Cost               | Pre-paid royalties, land costs, financing costs, initial inventory (fuel, chemicals, catalysts, spares, etc.), pre-production (start-up).               |   |  |  |  |
| E.                         | IDC/AFUDC,<br>escalation   | Cost of financing progress payments to vendors and contractors and increases in costs due to escalation during the construction period.                 |   |  |  |  |
| Ca                         | Capital Cost Accumulations |   |   |  |  |  |
| Total Plant Cost (TPC)     |                            | .)  | A + B + C                                   |  |  |  |
| Total Overnight Cost (TOC) |                            | (TOC)   | A + B + C + D                               |  |  |  |
| Tot                        | al Plant Investme          | nt  | A + B + C + E                               |  |  |  |
| Tot                        | al Capital Require         | d (Total As-Spent Capital, TASC)  | A + B + C + D + E                           |  |  |  |



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**Enterprise cost/benefit categories:** 

- **Financing costs: Capital costs and financial parameters** (debt/equity, debt cost, regulated rate of return, project life, etc.)
- Non-fuel operation and Maintenance
  - Operations staffing, insurance, taxes, etc. – Fixed:
  - Variable: Most maintenance (capacity factor-related)
- Fuel/resource operating costs (capacity factor-related)
- The most important benefit parameter is the annual capacity factor

### **Typical Figures of Merit:**

Levelized Cost of Electricity (LCOE): \$/MWh Regulated Utilities

%/year

- **Cost of Electricity:**
- Internal Rate of Return (IRR):

**NETL/DOE** \$/MWh **IPPs** 

# **Cost of Electricity (COE)**



$$COE = \frac{CCF \cdot TOC + OC_{FIX} + CF \cdot OC_{VAR}}{CF \cdot MWh}$$

- Where (all items below are to reported):
  - COE = Cost of generating electricity\*
  - CCF = Capital charge factor (annual financing and capital cost burden)
  - TOC = Total overnight capital
  - OC<sub>FIX</sub> = Sum of all fixed annual operating costs\* (labor, taxes, insurance)
  - OC<sub>VAR</sub> = Sum of all variable annual operating costs at 100% capacity\* (fuel, consumables, waste)
  - CF = Plant capacity factor
  - MWh = Annual net megawatt-hours

| Capital Charge Factor                 | High Risk |       | Low   | Risk  |
|---------------------------------------|-----------|-------|-------|-------|
| Capital Expenditure<br>Period (years) | 3         | 5     | 3     | 5     |
| Investor-owned utility                | 0.111     | 0.124 | 0.105 | 0.116 |
| Indep. power producer                 | 0.177     | 0.214 | 0.149 | 0.176 |



\* Escalation consistent with the assumed inflation rate, resulting in constant-dollar levelized costs.



#### Reported Economic Figures of Merit are often ambiguous or poorly defined.

Pertinent resources for developing and reporting unambiguous, welldefined economic Figures of Merit:

- Toward a Common Method of Cost Estimation for CO2 Capture and Storage at Fossil Fuel Power Plants. EPRI, Palo Alto, CA: 2013.
  <u>3002000176</u>. (Free download.)
- Quality Guidelines for Energy Systems Studies. http://www.netl.doe.gov/research/energy-analysis/quality-guidelines
  - Performing a Techno-Economic Analysis for Power Generation Plants
  - Capital Cost Scaling Methodology
  - Process Modeling Design Parameters
  - Estimating Plant Costs Using Retrofit Difficulty Factors
  - Others



### Conclusions



- Assumptions and constraints for steady-state modeling and techno-economic analyses are recommended
  - Intended to produce consistency in techno-economic sCO<sub>2</sub> cycle studies to allow for more meaningful results and comparisons against competing cycles
- Relies heavily on NETL and EPRI standard practices
  - Additional techno-economic analysis guidelines available through NETL and EPRI. Refer to conference paper for reference details
- This is a starting point for a more comprehensive set of assumptions and constraints. Please send feedback from industry and experimental research programs to:
  - Nathan Weiland: <u>nathan.weiland@netl.doe.gov</u>, (412)386-4649
  - David Thimsen: <u>dthimsen@epri.com</u>, (651) 766-8826



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### **Economic Analysis – COE**

- Cost of electricity (COE) is the revenue a power plant receives for the electricity generated.
  - An increase in the COE represents an increase in the public's electricity bill
  - Determining the COE is complex set of financial and regulatory rules
  - To simplify the COE calculation, a Capital Charge Factor (CCF) has been developed.
    - Simplifies and unifies common financial terms and assumptions
    - Annualizes the capital cost over the life of the plant
- A simplified equation can be utilized to determine the COE for Baseline comparison purposes

|       | First year     | first year            | first year           |
|-------|----------------|-----------------------|----------------------|
|       | canital charae | , + fixed operating + | - variable operating |
| COF = |                | costs                 | costs                |
|       | 0              | innual net megawat    | t hours              |
|       |                | of power generat      | ion                  |

$$COE = \frac{CCF \cdot TOC + OC_{FIX} + CF \cdot OC_{VAR}}{CF \cdot MWh}$$



### **Economic Analysis – COE**

$$COE = \frac{\mathbf{CCF} \cdot TOC + OC_{FIX} + \mathbf{CF} \cdot OC_{VAR}}{\mathbf{CF} \cdot \mathbf{MWh}}$$

| Plant Type | CCF w/ CC | CF   |
|------------|-----------|------|
| PC         | 0.124     | 0.85 |
| IGCC       | 0.124     | 0.80 |
| NGCC       | 0.111     | 0.85 |

- The **CCF** takes into account the financial aspects of the plant and represents them in a single factor that can then be used to annualize the capital over the life of the plant. Greater detail can be found in the QGESS documents.
- The MWh parameter is the net power generated (at 100% CF) by the plant.



### **Economic Analysis – Capital Costs**



### **Capital Costs of process equipment**

- Capital costs for unique equipment may be calculated by several methods:
  - Scaled: The equipment can be scaled if analogous equipment is available either in an NETL baseline study or otherwise
  - Bottom-up: Build cost from metal and manufacturing cost estimates
  - If neither a scaled approach or a bottom-up estimate can be produced - research goals or bearable costs can be estimated
    - This approach is occasionally used at laboratory scale projects
- The methodology, reference equipment, and sources of data should be documented in detail within the TEA
- Balance of plant will be directly used or scaled from the Baseline reports



## **Contingency Estimation**

- Contingency is to cover the known-unknowns or costs that will likely occur based on past experience due to incomplete engineering design
  - Example: FOAK plant will have high contingencies, the 2<sup>nd</sup> plant will have lower contingencies but more known costs
- Two types of contingencies are used:
  - Process Contingency: intended to compensate for uncertainty in cost estimates caused by performance uncertainties associated with the development status of a technology.
  - Project Contingency: AACE 16R-90 states that project contingency for a "budget-type" estimate (AACE Class 4 or 5) should be 15 percent to 30 percent of the sum of BEC, EPC fees and process contingency.
- Each "process" in the TEA is assigned a contingency

|                               | Process     |
|-------------------------------|-------------|
| Technology Status             | Contingency |
| New Concept – limited data    | 40+%        |
| Concept with bench scale data | 30-70%      |
| Small Pilot scale data        | 20-35%      |
| Full sized modules tested     | 5-20%       |
| Commercial process            | 0-10%       |



# **Contingency Estimation**

- R&D "projects" should have a higher contingency than those in the Baseline studies
- Level of Contingency used should be relative to the development level and engineering completeness of the technology.

#### (From NETL's Baseline)

| Process Contingency                 |     |
|-------------------------------------|-----|
| Slurry prep and Feed pump           | 5%  |
| Gasifier and syngas cooler          | 15% |
| Two stage Selexol                   | 20% |
| Mercury Removal                     | 5%  |
| CO <sub>2</sub> removal (PC & NGCC) | 20% |
| <b>Combustion Turbine</b>           | 5%  |
| AHT in IGCC                         | 10% |
| Instrumentation and controls        | 5%  |

 Process contingencies range between 2-5% of TPC (From NETL's Baseline)

#### • Contingency is not:

- To cover poor engineering or poor estimates
- Accuracy
- Cover a scope change
- Account for delays
- Unexpected cost escalation
- Plant performance after startup



### **Economic Analysis – Operating Costs**

| $COE = \frac{CCF \cdot TOC + OC_{FIX} + CF \cdot OC_{VAR}}{CF \cdot MWh}$ |   |
|---|---|
|   |   |
| Annual Operating Labor Cost   | Maintenance Material Cost                       |
| Maintenance Labor Cost  | **Fuel**  |
| Administrative & Support Labor  | Other Consumables                               |
| Property Taxes and Insurance  | Waste Disposal                                  |
| Additional OC <sub>Fix</sub> for new technology                           | Emission Costs                                  |
|   | Byproduct Revenues                              |
|   | Additional OC <sub>Var</sub> for new technology |

#### OC costs reported should be similar to those found in the Baseline Reports

