

1 **The Critical Role of Policy Enforcement in**
2 **Achieving Health, Air Quality and Climate**
3 **Benefits from India's Clean Electricity Transition**

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21 **ABSTRACT**

22

23 The coal-dominated electricity system poses major challenges for India to tackle air pollution
24 and climate change. Although the government has issued a series of clean air policies and low-
25 carbon energy targets, a key barrier remains enforcement. Here, we quantify the importance of
26 policy implementation in India's electricity sector using an integrated assessment method based
27 on emissions scenarios, an air quality simulation, and a health impact assessment. We find that
28 limited enforcement of air pollution control policies leads to worse future air quality and health
29 damages (e.g., 14,200 to 59,000 more PM_{2.5}-related deaths in 2040) than when energy policies
30 are not fully enforced (8,700 to 5,900 more PM_{2.5}-related deaths in 2040), since coal power
31 plants with end-of-pipe controls already emit little air pollution. However, substantially more
32 carbon will be emitted if low-carbon and clean coal policies are not successfully implemented
33 (e.g., 400-800 million tons more CO₂ in 2040). Thus, our results underscore the important role of
34 effectively implementing existing air pollution and energy policy to simultaneously achieve air
35 pollution, health and carbon mitigation goals in India.

36 1. INTRODUCTION

37 India faces the dual challenge of improving air quality and curbing carbon dioxide (CO₂)
38 emissions. On the one hand, the country suffers from severe air pollution. In 2017, the nation-
39 wide population-weighted mean exposure to ambient fine particulate matter (i.e., PM_{2.5}) was
40 nearly 90 µg/m³, which led to 0.67 million premature deaths that year¹. These health impacts
41 likely impose a significant economic burden on the economy; a recent estimate indicates that
42 India loses \$150 billion a year due to air pollution². On the other hand, India is currently the third
43 largest CO₂ emitter in the world³. As a developing country starting from a low emissions base,
44 the future emissions pathway of India will play a critical role in determining the global climate
45 landscape.

46 Mitigating air pollution and carbon emissions in India cannot be achieved without
47 tackling its coal-heavy electricity system. Due to the dominance of coal (76% of total
48 generation⁴), power generation currently contributes to about 40% of total CO₂ emissions⁵, as
49 well as 53% and 40% of energy-related sulfur dioxide (SO₂) and nitrogen oxides (NO_x)
50 emissions, respectively⁶. Options to reduce air pollution from the electricity sector include
51 installing end-of-pipe control technologies on coal-fired power plants and replacing coal power
52 generation with cleaner alternatives, notably wind and solar power. The latter approach has the
53 added benefit of reducing carbon emissions and contributing to the low-carbon energy transition.

54 In recent years, there has been an increasing emphasis on air pollution control and the
55 need for carbon mitigation by the Indian government and other key stakeholders. On the air
56 pollution side, India launched the National Clean Air Program (NCAP) in 2019, which set a
57 target of cutting PM_{2.5} and PM₁₀ concentrations in the 122 most polluted cities by 20-30% by
58 2024 relative to 2017 levels⁷. Regarding carbon mitigation, India has made significant efforts to

59 scale up renewable energy capacity in the recent decade. The share of renewables is already 23%
60 of installed capacity and 9% of generation⁴. Plans have also been announced to continue this
61 renewable energy push, including a target of 500 GW of renewable energy capacity by 2030⁸.

62 However, effective implementation is a key barrier to meeting these targets and enforcing
63 policies. Policy implementation has been particularly challenging in India's electricity sector. To
64 curb air pollutant emissions from the power sector, in December 2015, India issued strict
65 emissions standards for existing and newly built thermal power plants⁹. However, by the first
66 compliance deadline of December 2017, it was found that more than 300 coal power plants
67 continued to violate emission norms¹⁰. Consequently, the Central Electricity Authority (CEA)
68 extended the deadline for compliance in a phased manner between 2020 and 2024¹¹. Yet doubts
69 remain that even with the new deadline, many plants will not be able to comply¹². To facilitate
70 the low-carbon transition, India not only issued new renewable installation targets⁸, but also
71 introduced policies to increase the efficiency of newly built coal-fired power plants (e.g., the
72 Perform Achieve and Trade scheme¹³, a flagship programme under the National Mission for
73 Enhanced Energy Efficiency^{14,15}). Nevertheless, there is a growing inconsistency between the
74 ambitious government targets and the on-ground efforts of implementation agencies such as the
75 Solar Energy Corporation of India and state electricity distribution companies. For instance,
76 while the government aims to reach 175 GW of renewable capacity by 2022, current capacity
77 stands at 83 GW⁴. Some predict that India will fall short of its stated goal by as much as 42% due
78 to the unstable policy environment¹⁶.

79 This paper aims to quantify the importance of policy enforcement in India's electricity
80 sector for achieving air quality, health, and carbon mitigation objectives. Conceptually, our focus
81 on the challenge of enforcement is of direct policy relevance given India's institutional context.

82 Methodologically, we apply a state-of-the-art integrated assessment method to this policy-
83 relevant question, by combining emissions scenarios using the GAINS (Greenhouse Gas – Air
84 Pollution Interactions and Synergies)-South Asia model, an air quality simulation using WRF-
85 CMAQ (The Weather Research and Forecasting Model, coupled with the Community Multiscale
86 Air Quality Modeling System), and a health impact assessment using recent estimates for the
87 exposure-response functions. This framework facilitates the inclusion of air quality, health and
88 carbon mitigation considerations into India’s power sector policies, hence going beyond most
89 prior studies that focused either on the carbon challenge^{17–19} or on the air pollution crisis^{16–22}
90 alone.

91 **2. MATERIALS AND METHODS**

92 For air pollution, we use changes in the WRF-CMAQ simulated concentrations of fine
93 particulate matter (PM_{2.5}) to evaluate air quality impacts, and changes in PM_{2.5}-related deaths to
94 assess the health implications. For climate, we use changes in CO₂ emissions as a proxy for the
95 climate impacts, while acknowledging that a comprehensive evaluation of these impacts on the
96 climate system (e.g., radiative forcing, precipitation, temperature) will require a climate model as
97 done in other studies²⁶.

98 **2.1 Policy scenario design**

99 Based on the GAINS-South Asia model²⁷, we first design a state-level reference scenario
100 (WEO-CLE) from 2015 to 2040 which factors in the policies, measures and targets that have
101 been announced by the Government of India. We then design four scenarios that represent
102 limited implementation of existing air pollution control policies (i.e. WEO-DEL and WEO-FRO)
103 and energy policies (i.e. BAU-CLE and AMB-CLE). As such, the differences between WEO-
104 DEL/FRO and WEO-CLE represent the effects of failing to fully implement existing air

105 pollution policies, while the differences between BAU/AMB-CLE and WEO-CLE represent the
106 impacts of unsuccessful energy policy implementation (including greater electricity demand,
107 inefficient coal use, insufficient renewable penetration, etc.). For all five scenarios, the GAINS-
108 South Asia model estimates the emissions of air pollutants and CO₂ at the state level by
109 multiplying the activity data with technology- and fuel-specific emission factors.

110 We categorize different policies based on their primary target, even though in reality,
111 many policies simultaneously affect air pollution and carbon emissions. For instance, while the
112 policies to increase renewable energy reduce air pollutants and carbon emissions, we classify
113 them as energy policies since their direct objective is to scale up renewable capacity. Similarly,
114 the Environment (Protection) Rules include policies that are targeted at reducing air pollution in
115 the energy sector, such as mandating end-of-pipe control devices for SO₂, NO_x and PM
116 emissions. We classify them as air pollution policies, based on the same logic that their direct
117 objective is to curb air pollution.

118 **Reference scenario: WEO-CLE.** The national total energy projection of this scenario is
119 developed to be consistent with the “New Policy Scenario (NPS)” in the World Energy Outlook
120 2017²⁸. The NPS aims to provide a sense of the direction in which the latest policy ambitions could
121 take the electricity sector. The national energy projection is then allocated across Indian states
122 using the proportional downscaling algorithm reported in Rafaj et al. (2013)²⁹, which is based on
123 state fractions derived from subnational statistics. We consider the following policies and targets
124 for the power sector: a) Environment (Protection) Rules⁹; b) Universal electricity access by
125 2025^{28,30}; c) Strengthened measures such as competitive bidding to achieve the national target of
126 175 GW renewable capacity by 2022 (100 GW solar, 75 GW non-solar); d) Expanded efforts to
127 strengthen the national grid, upgrade the transmission and distribution network and reduce

128 aggregate technical and commercial losses to 15%^{31,32}; e) Increased efforts to ensure the financial
129 viability of all power market participants, especially transmission and distribution companies³³.
130 For air pollution control strategies, the WEO-CLE scenario mainly considers the Environment
131 (Protection) Rules 2015⁹, which tightened the emission standards for all thermal power plants with
132 especially stringent standards for new power plants installed after 2017.

133 ***Scenarios with limited implementation of air pollution policies: WEO-DEL and WEO-***
134 ***FRO.*** With the same energy projection as WEO-CLE, in WEO-DEL, we assume a 5 to 10-year
135 delay in the implementation of air pollution control strategies (i.e., the penetration rate of end-of-
136 pipe control strategies for each type of power plant in 2020/2025 is the same as that in 2015 for
137 WEO-CLE, and that in 2030/2040 is the same as that in 2025/2030 for WEO-CLE). In WEO-FRO,
138 we assume no further improvements in air pollution control policies after 2025 (i.e., the penetration
139 rates of end-of-control strategies for each type of power plant remains unchanged beyond 2025;
140 essentially “frozen”).

141 ***Scenarios with limited implementation of energy policies: BAU-CLE and AMB-CLE.***
142 With the same penetration rate of end-of-pipe control strategies for power plants, we consider two
143 alternative energy scenarios that assume unsuccessful efforts to scale up renewable generation
144 and/or to improve the efficiency of the coal power fleet. The national energy projections of BAU-
145 CLE and AMB-CLE are based on business-as-usual and ambitious scenarios for the year 2022 and
146 2040 in the Draft Energy Plan by NITI Aayog of the Government of India³⁴. To allocate national
147 total generation to individual states, the spatial patterns of renewable generation are based on the
148 state to national ratios of the 2022 installation targets³⁵, while those of fossil fuel capacity are
149 assumed to be the same as that in March 2016³⁶. The BAU-CLE scenario projects a much more
150 coal-heavy power mix in the future, implying policy failures in achieving renewable installation

151 and generation targets. In both scenarios, we include delays in improving coal plant efficiency by
 152 assuming that some of the new coal power plants still use subcritical technology. Essentially, we
 153 assume the share of advanced coal technologies (e.g., ultra-supercritical and supercritical coal units)
 154 is lower in these two scenarios when compared to the reference WEO-CLE scenario (more details
 155 in Supplementary Fig. 4).

156 **Table 1. Summary of five state-level scenarios for the electricity sector**

Scenarios		Energy strategy		Air pollution strategy
		Electricity demand and fuel mix	Coal plant technology	
Successful enforcement of both <i>air pollution</i> and <i>energy</i> policies	WEO-CLE	WEO: IEA <i>World Energy Outlook (WEO)</i> 2017, New Policy Scenario	All new coal power plants use supercritical or ultra-supercritical technologies	CLE: Successful implementation of <i>current legislation (CLE)</i> , e.g., the emission standards for coal power plants released in 2015
Limited enforcement of <i>air pollution</i> policies	WEO-DEL			DEL: Compared to CLE, 5-10 years <i>delay (DEL)</i> in the implementation of control strategy
	WEO-FRO			FRO: Compared to CLE, no further changes in implementation rate of control strategy after 2025, i.e. frozen beyond 2025
Limited enforcement of <i>energy</i> policies	BAU-CLE	BAU: NITI Aayog, Government of India, <i>Business-as-usual (BAU)</i> scenario	Some new coal power plants still use subcritical technology; others use supercritical or ultra-supercritical technologies	CLE: Successful implementation of <i>current legislation (CLE)</i> , e.g., the emission standards for coal power plants released in 2015
	AMB-CLE	AMB: NITI Aayog, <i>Ambitious (AMB)</i> scenario		

157

158 **2.2 WRF-CMAQ simulation**

159 We use CMAQ v5.0.2 developed by the United States Environmental Protection Agency
160 (U.S. EPA) to simulate surface air quality. A summary of model inputs and the setup is shown in
161 Table 2. Since air quality modeling is computing-intensive, we conduct simulations only for
162 2015 and 2040. To isolate the effects of implementation failures of power sector policies, we
163 keep future non-power sector activities unchanged from 2015 levels and only change power
164 sector emissions in 2040 (see Section 3.5 for the discussion on uncertainties associated with this
165 assumption). Our assumption to keep non-power emissions at 2015 levels is not meant to
166 represent plausible futures, but a computational method to calculate the marginal effect of policy
167 failures in the power sector. Our analysis hence complements prior work that examined the
168 health effects of India's power sector emissions^{22,38-40} and the impacts of multi-sector policy
169 interventions in the future⁴¹.

170 For 2015, we simulate the whole year. Annual anthropogenic emissions were obtained
171 from the Emission Database for Global Atmospheric Research (EDGAR) at a resolution of $0.1^\circ \times$
172 0.1° ³. Emissions of EDGAR v4.3 for 2010 are scaled to 2015 with scaling factors used in Kota et
173 al. (2018)²⁵. Non-methane volatile organic compounds (NMVOC) and PM emissions are mapped
174 to model species based on the SPECIATE 4.3⁴² database from the U.S. EPA. An in-house
175 preprocessor is used to generate hourly emissions based on monthly, weekly and diurnal temporal
176 allocation profiles⁴². For 2040, we conduct simulations for four representative months (i.e.,
177 January, April, July and October, to represent each of the four seasons). Future anthropogenic
178 emissions from the power sector are adjusted based on state-wise factors modeled by GAINS-
179 South Asia. Within each state, we then allocate emissions to $0.1^\circ \times 0.1^\circ$ grid boxes based on 2015
180 patterns. The emissions from non-power sectors are kept the same as in 2015 and reported in
181 Supplementary Fig. S1. By using the same meteorological inputs as in 2015, the differences in

182 simulated PM_{2.5} between 2015 and 2040 and across 2040 scenarios are driven entirely by the
183 differences in emissions.

184 The modeling spatial resolution is 36×36 km, with 27 vertical layers (the depth of the
185 surface layer is 35m). The model uses SAPRC-11^{43,44} as the photochemical mechanism and
186 AERO6⁴⁵ as the aerosol chemistry mechanism. The model has been improved to predict
187 secondary sulfates and nitrates, as well as secondary organic aerosols (SOA)^{46,47}. Meteorological
188 inputs for CMAQ are generated from the WRF v3.7.1 for 2015 with initial and boundary
189 conditions from National Centers for Environmental Prediction (NCEP) FNL (Final) Operational
190 Global Analysis data from the National Center for Atmospheric Research (NCAR)
191 (<http://dss.ucar.edu/datasets/ds083.2/>). The Meteorology-Chemistry Interface Processor (MCIP)
192 v4.2 is applied to post-process WRF outputs to CMAQ-ready meteorological inputs. The fire
193 inventory from the National Center for Atmospheric Research (NCAR)⁴⁸ is used to generate
194 open biomass burning emissions. Biogenic emissions were generated from the Model for
195 Emissions of Gases and Aerosols from Nature (MEGAN) version 2.1⁴⁹. To minimize the impacts
196 of initial conditions on model performance, we exclude results from the first three days of each
197 simulation as a model spin-up period.

198 Performance of the model application in 2015 is evaluated by comparing simulated and
199 observed data in multiple cities, as reported in Kota et al. (2018)²⁵. Supplementary Fig. S2 shows
200 the model domain covering India and surrounding regions.

201

Table 2. Summary of WRF-CMAQ model inputs and setup

Model	WRF V3.7.1/CMAQ V5.0.2	
Time period	2015: 12 month 2040: Four representative months (January, April, July, October)	
Spatial resolution	36km x 36km	
Meteorological initial/ boundary condition	2015 FNL (Final) Operational Global Analysis data	
Emissions	2015	Anthropogenic: Emissions Database for Global Atmospheric Research (EDGAR) version 4.3 in 2010 ³ , scaled to 2015 based on the scaling factors used in Kota et al. (2018) ²⁵ . Biogenic: MEGAN ⁴⁹ Fire: FINN ⁴⁸
	2040	Anthropogenic emissions from the power sector: State-level emissions projected by GAINS-South Asia, then allocated to 0.1° × 0.1° grid boxes following 2015 pattern. Non-power anthropogenic emissions, biogenic emissions, and fire emissions: Same as 2015

202

203 2.3 Health impact assessment

204 We quantify the mortality impacts due to the exposure to ambient fine particulate matter
205 (PM_{2.5}, i.e. particulate matter with a diameter small than 2.5μm). Our focus on the health effects
206 of ambient PM_{2.5} exposure is consistent with prior findings that PM_{2.5} exposure accounts for the
207 majority of long-term health damages and leads to much larger mortality impacts than other
208 types of pollutants (e.g., ozone) in India and worldwide^{1,50,51}. We consider six diseases
209 associated with long-term exposure to PM_{2.5}, i.e., ischemic heart disease (IHD), stroke, chronic
210 obstructive pulmonary disease (COPD), lung cancer (LC), lower respiratory tract infections
211 (LRI) and diabetes. For each disease, we use the following equation to calculate premature
212 deaths in each state for each scenario:

213

$$\Delta\text{Mortality}_d = I_d \cdot \text{Pop} \cdot \left(1 - \frac{1}{\text{RR}_{d(c)}}\right)$$

214 The definition and data source for each variable is summarized in Table 3. Note that
 215 relative risk (RR) is defined as the ratio of incidence rates between exposed and unexposed
 216 populations. $(1 - 1/RR)$ is hence the attributable fraction of deaths due to $PM_{2.5}$ exposure.

217 As a robustness check, we further consider: a) changing baseline mortality rates in 2040,
 218 using the national-level projection from GBD Foresight⁵² and cross-state variations in 2015
 219 (Supplementary Materials Section 4); b) alternative exposure-response functions, including non-
 220 linear disease-specific functions from the Global Exposure Mortality Model (GEMM)⁵³ and log-
 221 linear functions for all-cause mortality⁵⁴ (Supplementary Materials Section 3).

222 **Table 3. Summary of data for health impact assessment**

Variables	Definition	Data Source
I_d	Baseline annual mortality rate for disease d	For both 2015 and 2040: State-level age- and disease-specific baseline mortality rates in 2015 from GBD India Compare ⁵⁵ (Supplementary Table S4)
Pop	Exposed population in each state: <ul style="list-style-type: none"> • For IHD and stroke: Adult population aged 25 and above, by 5-year age group. • For COPD, LC, LRI and diabetes: Total population 	For 2015: State-level age-specific and total population in 2015 from GBD India Compare ⁵⁵ ; For 2040: Projected 2040 state-total population from Shared Socioeconomic Pathways #2 (SSP2) ⁵⁶ , assuming the same age structure in all states following the national-level projection (Supplementary Table S1-3).
$RR_d(c)$	Relative risks (RR) of disease d for the respective age groups at the $PM_{2.5}$ levels of c . <ul style="list-style-type: none"> • For IHD and stroke: Age-specific RR functions 	GBD Study ⁵⁰

	<ul style="list-style-type: none"> For COPD, LC, LRI and diabetes: All-age RR functions. 	
c	<p>Annual mean exposures:</p> <p>For 2015: 12-month average of the simulated population-weighted, state-averaged PM_{2.5} concentrations*</p> <p>For 2040: 4-month average of January, July, April and October, as representative months for each of the four seasons</p>	Based on our WRF-CMAQ simulations and population data in 2015

223

224 *Population weighted concentrations are calculated as following: $PWC = \frac{\sum c_i \times P_i}{Pop}$, where c_i is the PM_{2.5}

225 concentration in grid i , P_i is the population in grid i , and Pop is the total population in each Indian state.

226 Population data for 2015 is used, based on Population Division 58 (2015) at the Department of Economic

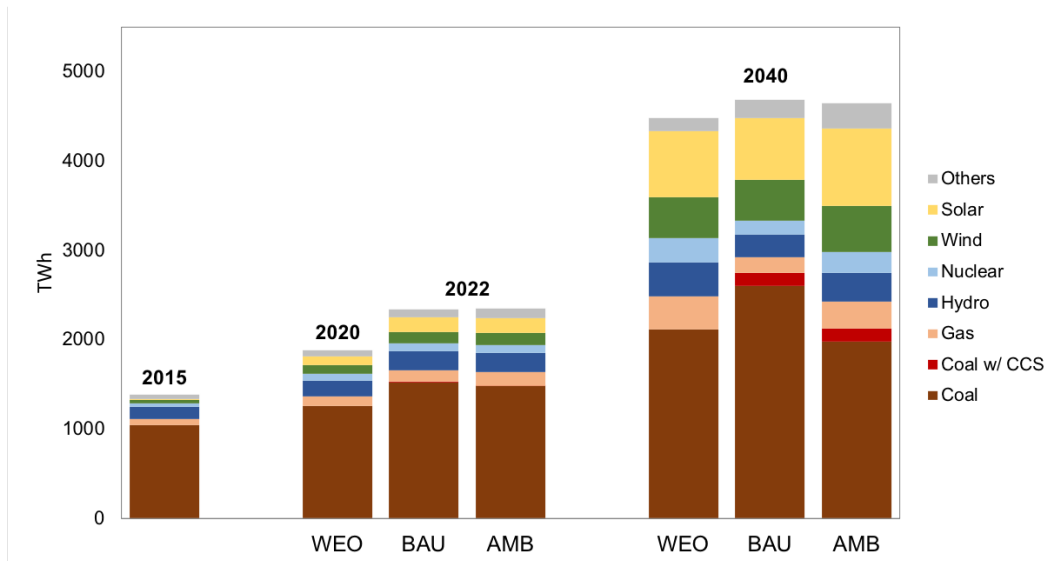
227 and Social Affairs in the United Nations⁵⁷.

228 3 RESULTS AND DISCUSSION

229 3.1 Impacts on electricity production (Fig. 1)

230 In all scenarios, electricity demand in India is projected to grow rapidly in the coming
231 decades. In WEO scenarios (i.e. WEO-CLE, WEO-DEL and WEO-FRO), national total
232 electricity generation is projected to grow from 1383 TWh in 2015 to 1883 TWh in 2020, and
233 then to 4480 TWh in 2040. The 2020 projection from WEO is much higher than electricity
234 production in 2018 (1561 TWh), the most recent year for which data is available⁵⁸. This is
235 because WEO assumed an annual average GDP growth rate of 7.7% between 2016-2025, which
236 is higher than real GDP growth rates in recent years (7.0%, 6.1% and 4.2% in 2017, 2018 and
237 2019, respectively⁵⁹). In comparison, the BAU and AMB scenarios assume that total generation
238 grows to 2341 TWh and 2346 TWh in 2022, and 4682 TWh and 4647 TWh in 2040,
239 respectively. The slightly higher projections in BAU and AMB are primarily because of the
240 higher population and economic growth rates being assumed.

241 For the 2020- and 2022- time horizon, all scenarios project continued coal dominance,
242 along with a noticeable increase in solar generation. By 2040, while the BAU scenario assumes
243 continued coal dominance (coal share of 57%), the WEO and AMB scenarios project a reduced
244 share of coal at 46-47%. In the meantime, the share of inefficient subcritical coal units is greater
245 in BAU and AMB than WEO (Supplementary Fig. S4), which leads to lower average energy
246 efficiency of the coal fleet and hence, higher emissions per unit of electric output. All scenarios
247 anticipate a rapid expansion of solar and wind energy from now to 2040, though WEO and AMB
248 project more renewable generation than BAU.



249

250 **Figure 1. National total electricity generation by source in WEO, BAU and AMB scenarios.** The
 251 WEO scenario by the IEA makes projections for 2020 and 2040²⁸, while the BAU and AMB scenarios by
 252 NITI Aayog make projections for 2022 and 2040³⁴.

253

254 **3.2 Impacts on emissions of air pollutants and CO₂ (Fig. 2)**

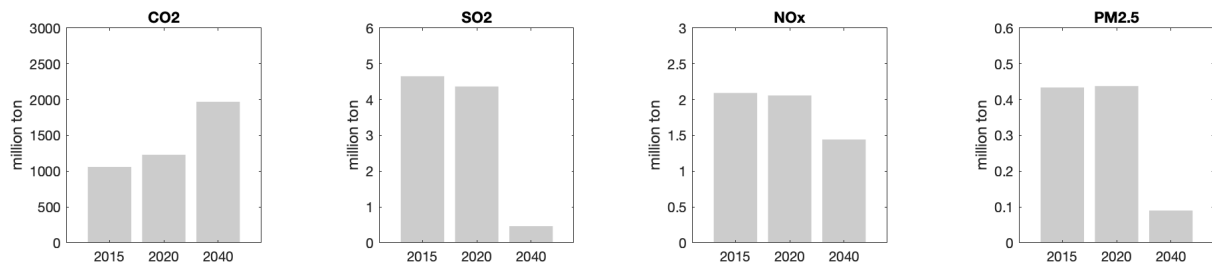
255 We highlight two findings. First, power sector CO₂ emissions are significantly affected
 256 by energy policies, but not by the implementation of air pollution control policies. Limited
 257 implementation of existing energy policies results in more generation from coal (in BAU-CLE),
 258 especially from inefficient coal units (in BAU-CLE and AMB-CLE). Quantitatively, in 2040,
 259 CO₂ emissions in BAU-CLE and AMB-CLE are 41% and 19% higher than in WEO-CLE,
 260 respectively (see Supplementary Fig. S5 for CO₂ emissions by plant type). In comparison,
 261 enforcing existing air pollution policies (mainly by installing end-of-pipe controls) has a
 262 negligible impact on CO₂ levels. Even if operating end-of-pipe controls reduces plant efficiency
 263 by a few percent (see a sensitivity analysis conducted in a previous work⁶⁰), the resulting
 264 increase in total CO₂ emissions from the power sector is still minimal.

265 Second, while the implementation of both air pollution and energy policies affect air
266 pollutant emissions from the power sector, the impacts of air pollution policies are often more
267 pronounced. In particular, 2040 air pollutant emissions are substantially higher if pollution
268 control policies are not made more stringent beyond 2025 (WEO-FRO). Quantitatively, while
269 2020 emissions in WEO-FRO remain the same as WEO-CLE, 2040 emissions in WEO-FRO are
270 7.9 times, 0.7 times, and 2.1 times greater than WEO-CLE for SO₂, NO_x and PM_{2.5} emissions,
271 respectively. These results are due to the accelerated implementation of air pollution control
272 technologies between 2025 and 2040 if current policy trends continue, as indicated in WEO-
273 CLE. If the implementation of air pollution policies is delayed by 5-10 years (as in WEO-DEL),
274 2020 emissions of SO₂, NO_x and PM_{2.5} are 24%, 8% and 6% higher than in WEO-CLE. By 2040,
275 NO_x emissions in WEO-DEL are 48% greater than in WEO-CLE, whereas SO₂ and PM_{2.5}
276 emissions remain the same as WEO-CLE. This trend is driven by our assumption that in the
277 perfect enforcement case (WEO-CLE), NO_x controls (e.g., selective catalytic or non-catalytic
278 reduction) will be implemented more slowly than SO₂ and PM_{2.5} measures (e.g., flue-gas
279 desulfurization and electrostatic precipitators). This is consistent with the pace of current policy
280 discourse. Despite much deliberation on SO₂ control measures over the past decade, action on
281 the installation of NO_x controls remained largely invisible until June 2018⁶¹. As such, in WEO-
282 CLE, almost all power plants are projected to have SO₂ and PM_{2.5} end-of-pipe controls by 2030.
283 The 10-year delay in WEO-DEL still means full SO₂ and PM_{2.5} control in 2040, but not NO_x
284 control.

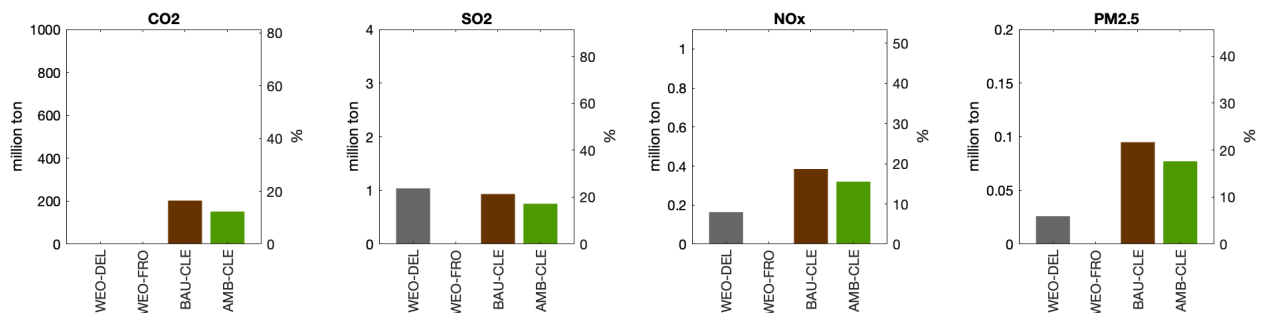
285 In 2020/2022, with limited energy policy implementation and given more fossil fuel-
286 based electricity generation in BAU-CLE and AMB-CLE than in WEO-CLE, SO₂, NO_x and
287 primary PM_{2.5} emissions are about 20% greater. However, by 2040, with SO₂ controls installed in

288 nearly every thermal power plant, power sector SO₂ emissions are minimal and there are
 289 negligible differences between different energy pathways (i.e., comparing BAU-CLE and AMB-
 290 CLE to WEO-CLE). However, BAU-CLE and AMB-CLE still result in more NO_x and PM_{2.5}
 291 emissions when compared to WEO-CLE (for NO_x and PM_{2.5} emissions respectively, 26% and
 292 36% greater in BAU-CLE than WEO-CLE, and 12% and 15% greater in AMB-CLE). This is
 293 due to greater fossil fuel-based electricity generation and the fact that some old subcritical coal
 294 power plants still do not have NO_x/PM_{2.5} end-of-pipe controls.

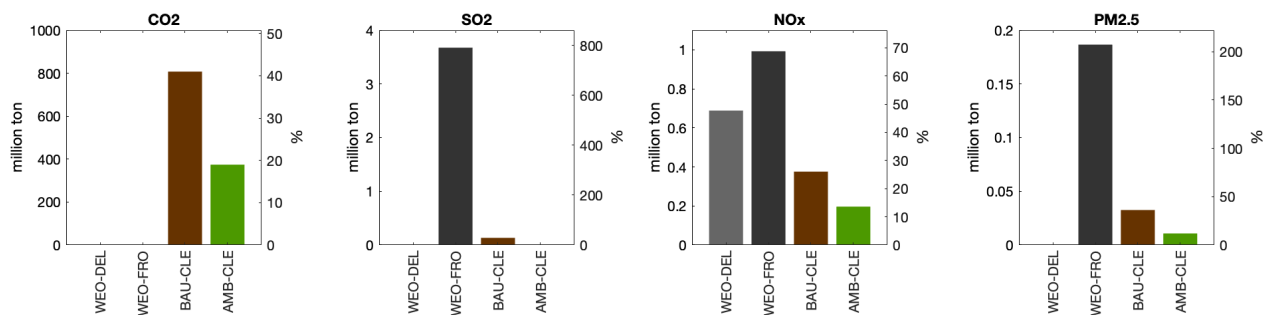
a) WEO-CLE



b) 2020/2022: Compared to WEO-CLE



c) 2040: Compared to WEO-CLE



295
 296 **Figure 2. Power sector emissions in the successful enforcement scenario (WEO-CLE, subplot a), and**
 297 **the changes for scenarios assuming limited enforcement of air pollution policies (WEO-DEL and**

298 WEO-FRO) or energy policies (BAU-CLE and AMB-CLE) relative to WEO-CLE in 2020/2022
299 (subplot b) and in 2040 (subplot c). Note that the WEO energy projection by IEA is made for 2020 and
300 2040²⁸, while the BAU/AMB projections by NITI Aayog are made for 2022 and 2040³⁴.

301

302 **3.3 Impacts on surface PM_{2.5} concentrations (Fig. 3)**

303 We first validate our WRF-CMAQ modeling by comparing simulated and observed
304 surface PM_{2.5} concentrations in 2015. We find that the model performs well in predicting average
305 concentrations as well as high pollution events^{22,25}. For instance, as discussed in Kota et al.
306 (2018)²⁵, when compared to observations, our simulated PM_{2.5} in 2015 has a normalized mean
307 bias within the range of -0.15 to 0.15 in most Indian cities, which meets the suggested criteria by
308 the U.S. EPA.

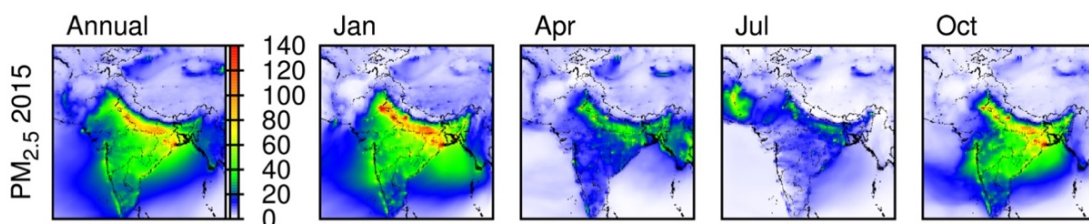
309 Consistent with prior studies^{25,41,62-64}, we find that PM_{2.5} concentrations are higher during
310 the wintertime and after the monsoon season, but lower during the pre-monsoon and monsoon
311 periods. This pattern is due to greater anthropogenic emissions and unfavorable dispersion
312 conditions during the colder months, and lower emissions and a greater scale of wet deposition
313 during the warmer months. As for the annual average, many places experience a concentration
314 level between 40-60 $\mu\text{g}/\text{m}^3$, with states in the Indo-Gangetic plain reaching levels higher than
315 80 $\mu\text{g}/\text{m}^3$.

316 With successful policy enforcement in WEO-CLE, simulated 2040 concentrations are
317 lower than 2015 levels throughout the country, since air pollutant emissions from the electricity
318 sector are reduced significantly and we assume that non-power emissions remain at 2015 levels
319 (Fig. 3). The annual average PM_{2.5} level in most places in Peninsular India is between 20-
320 40 $\mu\text{g}/\text{m}^3$, while in the northern states it lies between 40-60 $\mu\text{g}/\text{m}^3$. Hence, our results indicate

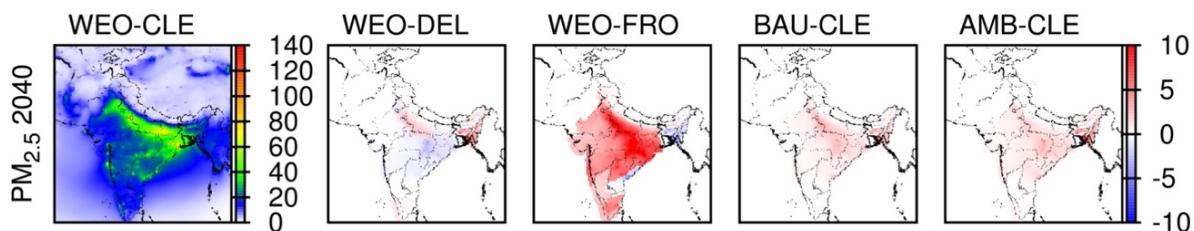
321 significant improvements in air quality if both energy and air pollution policies are implemented
322 successfully in India's electricity sector.

323 When comparing other scenarios to WEO-CLE, the WEO-FRO scenario, in particular,
324 shows a significant increase (i.e., 5-10 $\mu\text{g}/\text{m}^3$) in annual mean $\text{PM}_{2.5}$ levels throughout the
325 country. These results are driven by substantially greater air pollutant emissions when pollution
326 controls are not made more stringent beyond 2025. For the other three scenarios, the differences
327 compared to WEO-CLE are generally within the range of 1-2 $\mu\text{g}/\text{m}^3$.

a) Simulated $\text{PM}_{2.5}$ concentrations in 2015: Annual mean and monthly mean for four representative months



b) Simulated annual mean $\text{PM}_{2.5}$ concentrations in 2040: WEO-CLE and the changes in other scenarios relative to WEO-CLE



328
329 **Figure 3. Spatial distribution of ambient $\text{PM}_{2.5}$ concentrations (unit: $\mu\text{g}/\text{m}^3$).** a) 2015: Annual mean
330 concentration (12-month average) and monthly concentrations for four representative months (January,
331 April, July and October); b) 2040: Annual mean concentration in WEO-CLE, and the difference between
332 the other four scenarios compared to WEO-CLE. The absolute $\text{PM}_{2.5}$ concentration in each scenario is
333 presented in Supplementary Fig. S6, and the population-weighted, state-averaged $\text{PM}_{2.5}$ concentration is
334 presented in Supplementary Fig. S7.

335

336 **3.4 Impacts on PM_{2.5}-related deaths (Figs. 4 and 5)**

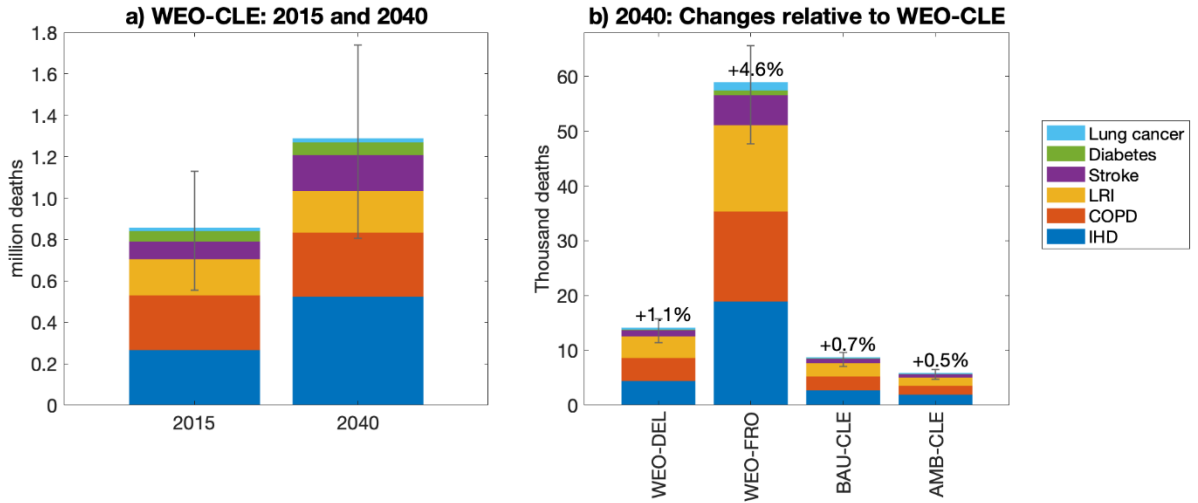
337 We estimate total PM_{2.5}-related mortalities to be 0.9 million (confidence interval due to
338 relative risk functions: 0.6 to 1.1 million) in 2015. The leading causes of deaths are ischemic
339 heart disease (IHD), chronic obstructive pulmonary disease (COPD), and lower respiratory tract
340 infections (LRIs). This estimate is broadly in line with prior studies^{1,22}. Under WEO-CLE, PM_{2.5}-
341 related deaths increase to 1.3 million (confidence interval: 0.8 to 1.7 million) in 2040. This
342 indicates a 50% increase in PM_{2.5}-related deaths from 2015 to 2040, despite a 9% decrease in
343 annual mean population-weighted PM_{2.5} levels (calculated based on state-total population and
344 state-averaged PM_{2.5} concentrations) as a result of decreasing power sector emissions. The main
345 drivers are demographic changes that can play an important role when estimating the past and
346 future health impacts of air pollution in India^{65,66}. From 2015 to 2040, the total population is
347 projected to increase by 21% (Supplementary Table S1). Also, due to the effect of aging, the
348 share of the population older than 60 years is projected to increase from 8.9% in 2015 to 17.8%
349 in 2040 (Supplementary Table S2 and S3), further increasing the health burden due to air
350 pollution since the elderly population is more vulnerable. Indeed, when holding demographic
351 factors constant at 2015 levels, we find that the reduction in PM_{2.5} exposure can lead to a 3%
352 decrease in total deaths, indicating that future mortality is significantly affected by demographic
353 changes.

354 With limited enforcement of air pollution control policies, in 2040, we find 14,200 and
355 58,900 more cases of premature deaths (or 1.1% and 4.6% higher) in WEO-DEL and WEO-FRO
356 respectively, when compared to WEO-CLE. This finding indicates that the successful
357 implementation of current air pollution policies in the electricity sector is vital for reducing the

358 overall public health burden. Making pollution control policies more stringent over time is
359 especially important.

360 In comparison, with weak enforcement of energy policy, in 2040, BAU-CLE and AMB-
361 CLE lead to only 8,700 and 5,900 more cases of premature mortality (i.e., 0.7% and 0.5% more
362 deaths) when compared to WEO-CLE. This implies that while energy strategies can affect air
363 pollution levels and the resulting health impacts, these factors are less important than the strict
364 enforcement of proposed air pollution control strategies in thermal power plants.

365 At the subnational level, under WEO-CLE, the Indo-Gangetic Plain (IGP) in northern
366 India has the most health damages in both 2015 and 2040 (Fig. 5). This region is a hotspot for
367 PM_{2.5} pollution due to high emissions of air pollutants as well as reduced ventilation caused by
368 obstruction from the Tibetan Plateau⁶⁴. It is also a densely-populated region at present and in our
369 2040 projection. Under limited enforcement of air pollution control policies, the greatest increase
370 in air-pollution related deaths relative to WEO-CLE occurs in these northern states, though the
371 magnitude is much higher in WEO-FRO than in WEO-DEL. Under limited enforcement of
372 energy policies, the increase in PM_{2.5}-related deaths relative to WEO-CLE is more spread out
373 throughout the country, since the subnational patterns of renewable installation and coal
374 displacement follow different assumptions in BAU-CLE/AMB-CLE than in WEO-CLE.



375

376

Figure 4. National total $PM_{2.5}$ -related deaths: a) for 2015 and 2040 in WEO-CLE, and b) the

377

changes in other scenarios relative to WEO-CLE in 2040. Different colors represent the six different

378

diseases considered this study, i.e., ischemic heart disease (IHD), chronic obstructive pulmonary disease

379

(COPD), lower respiratory tract infections (LRI), stroke, diabetes, and lung cancer. In panel a), the

380

increase from 2015 to 2040 under WEO-CLE is driven by demographic changes (Supplementary Table

381

S1-3) combined with a decrease in power sector emissions and surface $PM_{2.5}$ concentrations (as shown in

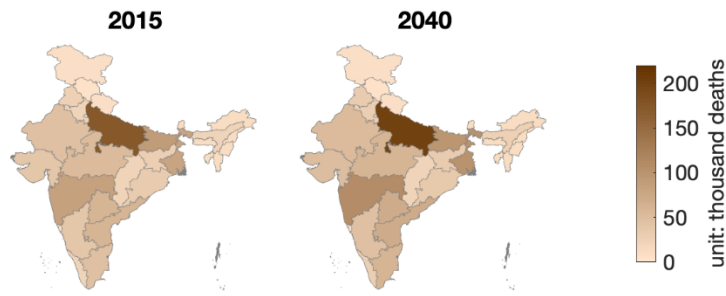
382

Fig. 2a and Fig. 3). In panel b), the changes in other scenarios relative to WEO-CLE in 2040 is driven

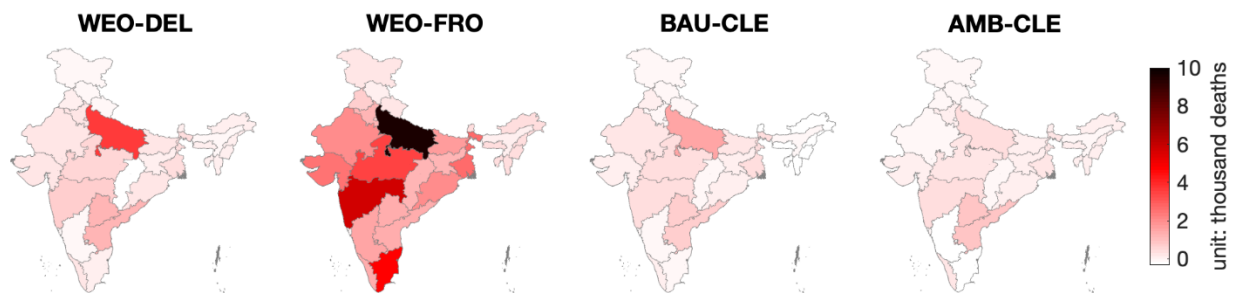
383

only by differences in emissions and the resulting $PM_{2.5}$ concentrations.

a) Annual total PM_{2.5}-related deaths in WEO-CLE



b) PM_{2.5}-related deaths in 2040: Changes relative to WEO-CLE



384

385 **Figure 5. Annual total PM_{2.5}-related deaths by state: a) in WEO-CLE: 2015 and 2040; b) in 2040:**
386 **changes in each scenario relative to WEO-CLE.**

387

388 **3.5 Potential uncertainties**

389 For the health impact assessment, we consider two major factors in our uncertainty
390 analysis: a) changing future baseline mortality rates (Supplementary Fig. S14 and Table S8), and

391 b) alternative exposure-response functions (Supplementary Fig. S9-13 and Table S6-7).

392 Regarding baseline mortality, while the main results above assume the same baseline mortality

393 rates in 2040 as in 2015, the age- and disease-specific baseline mortality rates often decrease

394 over time with growing income levels and an improving healthcare system⁶⁶. When we update

395 the 2040 baseline mortality rates based on the national-level projection from GBD Foresight⁵²

396 and current cross-state variations, we find that 2040 PM_{2.5}-related deaths under WEO-CLE

397 decrease to 1.2 (0.8 to 1.5) million nationally, which is 9% lower than our main results.
398 However, the relative changes in policy failure scenarios when compared to WEO-CLE are
399 similar to the main results. For instance, national total deaths are 1.2%, 4.8%, 0.7% and 0.5%
400 higher in WEO-DEL, WEO-FRO, BAU-CLE and AMB-CLE scenario, respectively.

401 For exposure-response functions (Supplementary Materials Section 3, Fig. S9-S13, Table
402 S6-7), while the main results utilize the RR functions for six diseases based on the GBD study,
403 here we consider alternative RR functions for five diseases (i.e., stroke, lung cancer, IHD, LRI
404 and COPD) from the Global Exposure Mortality Model (GEMM)⁵³. We find that applying
405 GEMM functions leads to significantly higher estimates of premature deaths than in our main
406 results, which is consistent with prior findings⁵³. For instance, total 2040 deaths in WEO-CLE
407 are estimated to be 2.3 (1.7 to 2.7) million with GEMM RR functions, as compared to only 1.3
408 (0.8 to 1.7) million in our main results. Yet our key finding – that policy failure scenarios always
409 result in more deaths than WEO-CLE, and the highest deaths occur in WEO-FRO –remains
410 robust. In addition, although non-linear RR functions from GBD and GEMM are more consistent
411 with recent epidemiological evidence that marginal mortality risks decrease with increasing
412 PM_{2.5} concentrations at high levels, we also consider the log-linear RR function for all-cause
413 mortality from an earlier study (Pope et al. 2002⁵⁴), which yields similar findings about the
414 impacts of policy failures.

415 In addition, there can be two other major uncertainties in our air quality simulations.
416 First, since our goal is to assess the impacts of enforcing electricity sector policies, we only
417 change electricity sector emissions in 2040, and keep non-electricity sector emissions at 2015
418 levels. However, as studied carefully in our prior study⁴¹, future emissions from other sectors
419 involve a large degree of uncertainty, which can significantly affect future air quality. Due to

420 non-linear interactions between various types of primary emissions to form aerosols, our WRF-
421 CMAQ simulations may under- or over-estimate the changes in PM_{2.5} concentration levels that
422 result from unsuccessful energy policy enforcement. Though a quantitative assessment is beyond
423 the scope of this study, key factors identified in prior studies include local pollution sources (e.g.,
424 the availability of SO₂, NO_x, and NH₃ emissions to form secondary aerosols) and meteorological
425 conditions (e.g., relative humidity, wet deposition through precipitation, and wind transport)^{25,64}.
426 Second, all power sector emissions are allocated to the surface layer in our simulations, while in
427 reality coal power plants use tall smokestacks. As a result, we may overestimate the effect of
428 coal power plant discharge on surface PM_{2.5} concentrations and human exposure.

429

430 **3.6 Policy implications and future directions of research**

431 Given the dual challenge of simultaneously curbing CO₂ emissions and air pollution in
432 India, we find that limited enforcement of air pollution control policies leads to worse air quality
433 and more health damages (e.g., 14,200 to 59,000 more PM_{2.5}-related deaths in 2040), while the
434 air pollution penalty is less significant when energy policies are not fully enforced (8,700 to
435 5,900 more PM_{2.5}-related deaths in 2040), since coal power plants with end-of-pipe controls
436 already emit little air pollution. However, substantially more carbon emissions will be emitted if
437 low-carbon and clean coal policies are not successfully implemented (e.g., 400-800 million tons
438 more CO₂ in 2040). Further, we observe greater cross-scenario variations in CO₂ impacts than air
439 pollution impacts (see Supplementary Fig. S8 for a combined analysis of air pollution and CO₂
440 impacts at both, national and subnational levels). This is because while CO₂ impacts are directly
441 influenced by the amount of fossil fuel generation in the future, some level of air pollution

442 control will always exist – even in the delayed or frozen air pollution policy scenarios – since
443 many measures are already taken today.

444 Our results underscore the critical role of implementing existing air pollution and energy
445 policy to simultaneously achieve India’s air pollution, health and carbon mitigation goals.
446 Enforcing air pollution controls can avoid premature deaths from air pollution exposure, even in
447 scenarios dominated by continued coal-fired power generation. Thus, if India cannot reduce or
448 eliminate its reliance on coal, the enforcement of air pollution control is essential to mitigate the
449 country’s public health crisis. While limited enforcement of energy policy may not be a major
450 issue for air quality, it will certainly undermine India’s efforts to mitigate climate change through
451 low-carbon development as laid out in the Paris Agreement. Thus, the simultaneous achievement
452 of air pollution, health, and carbon mitigation goals will require effective enforcement of both air
453 pollution control and low-carbon energy policies.

454 For policymakers, our study emphasizes that policy enforcement should be a priority.
455 India’s current policy framework is a good start on paper to solve the dual challenges of climate
456 change and air pollution. However, delayed or incomplete enforcement would significantly
457 compromise the policies’ efficacy. For the Government of India, the first order of business is to
458 develop strategies that ensure the timely and complete implementation of clean energy and air
459 pollution policies. On air pollution, policy priorities include full enforcement of current
460 emissions standards for all coal-fired power plants and establishment of a real-time monitoring
461 system that allows authorities and citizens to detect and promptly act on violations. In fact, one
462 objective of the National Clean Air Program (NCAP) is to enhance the ambient air quality
463 monitoring network across the country and create a comprehensive and reliable database of this
464 information. In particular, the current push for the Continuous Emission Monitoring System is a

465 step in the right direction. On clean energy, meeting current deployment targets requires
466 reducing investment risks by enforcing power purchase agreements and, over time, developing a
467 more extensive and flexible power market to deal with the intermittency of solar and wind power
468 by balancing supply and demand across the country.

469 To improve the quantification of air quality, health, and climate implications of power
470 sector strategies, future research should consider integrating the impact assessment approach
471 used in this analysis with power system models. Power system models provide detailed
472 representations of the generation system, transmission system and end-use sectors, and can help
473 develop strategies to link electricity supply and demand decisions, e.g., how much renewable
474 electricity can be integrated when coupled with electric vehicles and heating options. Despite
475 some recent attempts, fine resolution power system modeling requires further development for
476 the Global South including India. A fine temporal horizon would be useful to model the
477 environmental implications of a low-carbon power system. For instance, prior studies on
478 advanced economies utilized hourly or minute-level analyses and found that using thermal
479 generation to balance renewable generation may lead to an emission penalty^{67,68}.

480 To advance interdisciplinary policy-oriented research, it is necessary to combine social
481 sciences knowledge regarding political feasibility and implementation challenges with the
482 quantitative modeling utilized in this study. As our study draws attention to policy
483 implementation in India, we highlight three key areas for further interdisciplinary inquiry. First,
484 future studies should investigate drivers of weakly enforced air pollution standards, as well as the
485 institutional weaknesses in the power sector that make renewable energy investment risky (such
486 as rigid power purchase agreements and unreliable payments by electricity distribution
487 companies).

488 Second, inter-state cooperation is worth further attention. In many Indian states, emission
489 sources that are outside their immediate jurisdiction make dominant contributions to ambient
490 PM_{2.5} pollution^{20,69}, and these impacts of cross-state air pollution transport are captured by our air
491 pollution simulations. Consequently, most states cannot achieve significant improvements in air
492 quality and reduced population exposure on their own and require coordinated mitigation efforts
493 in nearby regions⁷⁰.

494 Third, due to the geographic mismatch between renewable-abundant states and high-
495 demand states, cross-state transmission is critical to transport renewable power to demand
496 centers. In this case, India’s federal structure is an issue, as individual states have considerable
497 authority over power sector investments, pricing, and trade. Developing politically feasible yet
498 effective policy packages that enhance inter-state power trade emerge as an important priority.
499 This design challenge requires understanding the distributional consequences of electricity
500 trading and developing mechanisms that compensate potential losers, thus mitigating political
501 opposition and reaping the gains of an extensive inter-state transmission network.

502

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