BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 191
June Schahfer Order

Midcontinent Independent System Operator, Inc. Order No. 202-26-29
Northern Indiana Public Service Company LLC
Regarding R.M. Schahfer Generating Station

Pursuant to the authority vested in the Secretary of Energy by section 202(c) of the Federal Power Act (FPA),[1] and section 301(b) of the Department of Energy (DOE or the Department) Organization Act,[2] and for the reasons set forth below, I hereby determine that an emergency exists in portions of the Midwest region of the United States (U.S.) due to a shortage of electric energy, a shortage of facilities for the generation of electric energy, and other causes. Issuance of this Order will meet the emergency and serve the public interest.

BACKGROUND

The R.M. Schahfer Generating Station (Schahfer) is an electric generating facility in Wheatfield, Indiana. Schahfer is owned and operated by Northern Indiana Public Service Company (NIPSCO), a division of NiSource Inc. Schahfer consists of two 129 MW natural-gas fired generation units and two coal-fired generation units, Unit 17 (423.5 MW) and Unit 18 (423.5 MW).[3] Unit 17 and Unit 18 began operations in 1983 and 1986, respectively. Unit 17 and Unit 18 were both slated to cease operations in December 2025.[4]

Order No. 202-25-12, issued pursuant to FPA section 202(c), required that Schahfer Unit 17 and Unit 18 remain in operation for 90 days, through March 23, 2026. Subsequently, Order No. 202-26-19, issued pursuant to FPA section 202(c), required the Schahfer Units to remain in operation for 90 days, until June 21, 2026. These orders

[1] 16 U.S.C. § 824a(c).

[2] 42 U.S.C. § 7151(b).

[3] U.S. Energy Info. Admin., *Form EIA-860, Schedule 3: Generator Data* (2024), https://www.eia.gov/electricity/data/eia860/.

[4] It likely would be difficult for the coal-fired units to resume operations once retired. Specifically, practical issues, such as employment, contracts, and permits, may greatly increase the timeline for resumption of operations during the period they are needed. Moreover, if NIPSCO were to begin disassembling the units or other related facilities, the associated challenges would be greatly exacerbated. The costs and time of decommissioning a coal plant are extensive, and restarting such decommissioned plants would presumably cost the same as decommissioning in dollars and time, if not more. Thus, continuous operation is required in such cases so long as the Secretary determines a shortage exists and is likely to persist. *See* Jennifer Lessick et al., *Bus. Models for Coal Plant Decommissioning*, at 9-12 (Aug. 2021), https://www.pnnl.gov/main/publications/external/technical_reports/PNNL-31348.pdf.

were based on my determination that emergency conditions existed in the region served by the Midcontinent Independent System Operator, Inc. (MISO).

Specifically, I determined that MISO faced tight reserve margins due to well-documented year-round resource adequacy concerns, particularly during periods of high demand or low generation resource output.[5] I determined that the continued operation of Schahfer would provide additional generation capacity during these periods, which would help prevent the loss of power to homes and businesses that would otherwise pose a risk to public health and safety.[6] I determined that the continued operation of Schahfer was necessary to alleviate immediate and anticipated threats to reliability.[7]

My determination was based on several facts. First, in its 2024 Long-Term Reliability Assessment (LTRA), the North American Electric Reliability Corporation (NERC) notes that the MISO assessment area, which covers portions of Arkansas, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, Montana, North Dakota, South Dakota, Texas, and Wisconsin, is at an elevated risk, "because probabilistic assessments indicate above-normal generator outages during extreme weather can result in unserved energy or load loss. With uncertainty around new resource additions and existing generator retirements, MISO is also at risk of falling below [Reference Margin Levels] within the next five years."[8] Additionally, the LTRA notes that "[t]he departure of MISO's coal fleet has continued with a reduction in capacity of around 6 GW in the past year, and a projected reduction of a further 12 GW over the next five years."[9]

Second, MISO's year-round resource adequacy concerns are well-documented. In 2022, MISO requested Federal Energy Regulatory Commission (FERC) approval of its filing to revise its resource adequacy construct (including the Planning Resource Auction or PRA) to establish capacity requirements for each of the four seasons of the year rather than on an annual basis determined by peak summer demand.[10] MISO justified this revision by explaining that "Reliability risks associated with [r]esource [a]dequacy have shifted from 'Summer only' to a year-round concern."[11]

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[5] *See*, *e.g.*, *Midcontinent Indep. Sys. Operator, Inc.*, DOE Order No. 202-25-12, at 1–4 (Dec. 23, 2025).

[6] *See, e.g.*, *id.*

[7] *See, e.g.*, *id.* at 5.

[8] N. Am. Elec. Reliability Corp.*, 2024 Long-Term Reliability Assessment*, at 13 (Dec. 2024, corrected July 11, 2025), https://www.nerc.com/globalassets/our-work/assessments/2024-ltra_corrected_july_2025.pdf.

[9] *Id.* at 44.

[10] *Midcontinent Indep. Sys. Operator, Inc.*, Transmittal Letter, FERC Dkt. No. ER22-495-000 (filed Nov. 30, 2021). FERC accepted MISO's proposed tariff revisions on August 31, 2022. *See also Midcontinent Indep. Sys. Operator, Inc.*, 180 FERC ¶ 61,141 (2022), *order on reh'g*, 182 FERC ¶ 61,096 (2023).

[11] *MISO,* Transmittal Letter, FERC Dkt. No. ER22-495-000, at 3.

MISO noted that over 60% of all "MaxGen" events (events when MISO initiates emergency procedures because of concerns over the adequacy of available generation) occurred outside of the summer season.[12]

CONTINUING EMERGENCY CONDITIONS

The emergency conditions that necessitated the issuance of Order Nos. 202-25-12 and 202-26-19 continue, both in the near and long term. The production of electricity from Schahfer continues to be critical to maintain reliability in MISO. MISO's resource adequacy concerns were most recently demonstrated during Winter Storm Fern, when Schahfer operated under a cold weather alert and declared conservative operations from January 23–February 1, 2026. On January 24, MISO declared an Energy Emergency Alert (EEA) 1, as well as an EEA 2 "MaxGen" event for MISO's North and Central Regions due to generation outages, high demand, and transfer capability limits.[13] From January 21–February 1, 2026, Schahfer operated at over 285 MW every day.[14]

In December 2023, MISO released an "Attributes Roadmap," in which it presented an in-depth look at the challenges of operating a reliable bulk electric system in a rapidly transforming energy landscape.[15] Among other things, this report described changes in the time of year during which the risk of the loss of load was greatest. For the 2023/2024 Planning Year the greatest risk of loss of load was in the summer, but it is expected that by the summer of 2027 there will be an equal loss of load risk in both the summer and fall seasons. MISO also projected risk of loss of load in the winter and spring seasons, which, although not as high as in the summer or fall, will nevertheless increase over time.[16]

More recently, MISO affirmed the resource adequacy problems occurring outside of its summer season in its 2024 report entitled, *MISO's Response to the Reliability Imperative.*[17] In a section of that report entitled, *Risks in Non-Summer Seasons*, MISO again stressed that it has resource reliability concerns outside of the summer season.

Widespread retirements of dispatchable resources, lower reserve margins, more frequent and severe weather events and increased reliance on weather-dependent renewables and emergency-only resources have altered the region's historic risk profile,

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[12] *Id.* at 3–4.

[13] *See* MISO (@MISO_energy), X (Jan. 24, 2026), https://x.com/MISO_energy/status/201 5072060876140805?s=20.

[14] DOE, *FACT SHEET: Energy Dep't Prevented Blackouts & Saved Am. Lives During Winter Storms* (Feb. 2026), https://www.energy.gov/articles/fact-sheet-energy-department-prevented-blackouts-saved-american-lives-during-winter-storms.

[15] MISO, *Attributes Roadmap*, at 3 (Dec. 2023), https://cdn.misoenergy.org/2023%20Attributes%20Roadmap631174.pdf.

[16] *Id.* at 11.

[17] MISO, *MISO's Response to the Reliability Imperative* (updated Feb. 2024), https://cdn.misoenergy.org/2024+Reliability+Imperative+report+Feb.+21+Final504018.pdf.

creating risks in non-summer months that rarely posed challenges in the past.[18] These MISO studies indicate that the emergency conditions caused by the loss of generation capacity in MISO extend past the summer season.

In January 2026, NERC released its 2025 Long-Term Reliability Assessment, NERC assessed that the MISO region is at high risk of energy shortfalls over the next five years, stating that it faces significant reliability challenges as "projected resource additions do not keep pace with escalating demand forecasts and announced generator retirements."[19] This determination is based on the combination of accelerating demand growth from new data centers and the retirement of existing thermal generators.[20] The 2025 Long-Term Reliability Assessment notes that "MISO's accredited thermal capacity has decreased by 8.8 GW, driven primarily by reductions in accredited capacity of existing facilities and retirements."[21] The report observes that winter peak periods are a particular concern, with projections showing "shortfalls in planned resources for winter peak periods."[22] However, NERC also concluded that "risks could expand into spring and fall generator maintenance periods when the available dispatchable generation is not enough to counter wind and solar variability when demand is high."[23]

According to NERC's 2026 Summer Reliability Assessment, load growth in the MISO region, led by data centers, "is expected to accelerate in 2027 and beyond, which may lead to increased reliability risk in the future if resource additions cannot keep pace with rising load forecasts."[24] It further notes that "[a]bove-normal summer peak load combined with low resource conditions could result in the need to employ operating mitigations (e.g., load-modifying resources) and EEAs [Energy Emergency Alerts]."[25] Since the region benefits from transmission connections with neighbors to meet extreme conditions, MISO's reliance on electricity imports will increase when extreme conditions arise.[26]

The evidence indicates that there is also a potential longer-term resource adequacy emergency in MISO. When MISO reported the results of its PRA for the 2025–26 Planning Year, it noted that "new capacity additions were insufficient to offset

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[18] *Id.* at 12.

[19] NERC, *2025 Long-Term Reliability Assessment,* at 7–8 (Jan. 2026), https://prod.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf.

[20] *Id.* at 43.

[21] *Id.* at 15.

[22] *Id*.

[23] *Id.*

[24] NERC, *2026 Summer Reliability Assessment*, at 16 (May 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_sra_2026.pdf.

[25] *Id.* at 16.

[26] *Id.* at 16.

the negative impacts of decreased accreditation, suspensions/retirements and external resources" in the northern and central zones, which include Indiana.[27]

On June 6, 2025, the Organization of MISO States (OMS) and MISO issued the results of their annual survey (OMS-MISO Survey), which reported the degree to which expected capacity resources satisfy planning reserve margin requirements.[28] The OMS-MISO Survey presented projections of resource adequacy for the summer of 2026 and subsequent years. Although the OMS-MISO Survey projected a potential capacity surplus for the summer of 2026, it also projected that at least 3.1 GW of additional generation capacity beyond currently committed generation capacity must be added to meet the projected planning reserve margin. The OMS-MISO Survey also projected that there would be insufficient capacity to meet the peak demand for electricity in each of the following four summers, increasing from a deficit of 1.4 GW in 2027 to 8.2 GW in 2030.[29] It also projected similar results for MISO's winter seasons, with a small surplus of generation capacity in 2026, followed by increasing deficits the following four years.[30]

The primary reasons for these projected deficits also are shown on the OMS-MISO Survey. Large amounts of existing generation capacity are projected to be retired each year, while, at the same time, the demand for electricity is projected to increase at an accelerating pace.[31] Although the OMS-MISO survey projects generation capacity to continue to increase in the coming years with the addition of new potential generation assets, the increase in capacity is largely offset by the projected retirements and does not keep up with the growth in demand.[32]

According to the U.S. Energy Information Administration, coal-fired electricity generation in Indiana has declined from 85% of total generation in 2014 to 42% in 2024. Since 2014, approximately 5,000 MW of coal-fired capacity in Indiana have retired, with nearly another 3,900 MW of coal-fired capacity scheduled for retirement by the end of 2028, which includes Schahfer's capacity.[33]

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[27] MISO, *Planning Res. Auction: Results for Planning Year 2025–26*, at 13 (Apr. 2025), https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf.

[28] OMS and MISO, *OMS-MISO Survey Results* (updated June 6, 2025), https://cdn.misoenergy.org/20250606%20OMS%20MISO%20Survey%20Results%20Workshop%20Presentation702311.pdf.

[29] *Id.* at 7.

[30] *Id.* at 9.

[31] *Id.* at 7, 9.

[32] *Id*.

[33] *See* U.S. Energy Info. Admin. , *Indiana Analysis* (Nov. 19, 2025), https://www.eia.gov/states/in/analysis.

MISO has been taking steps to address these projected deficits, but the solution is years away. For example, on June 6, 2025, MISO submitted a proposal to FERC to establish an Expedited Resource Addition Study (ERAS) process to provide a framework for the expedited study of interconnection requests to address urgent resource adequacy and reliability needs in the near term. This proposal was approved by FERC on July 21, 2025.[34] The ERAS process should help expedite the construction of needed new capacity. However, resources studied under the ERAS will have commercial operation dates that are at least three years after the process begins and are provided an additional three-year grace period to commence commercial operations.[35] In addition, supply chain constraints impeding the acquisition of critical grid components, including large natural gas turbines and transformers, are likely to further hinder rapid construction and exacerbate reliability concerns.[36] Consequently, the new ERAS process is unlikely to result in the addition of any new generation capacity in the next few years.

Order Nos. 202-25-12 and 202-26-19 were preceded by executive orders on January 20, 2025, and April 8, 2025, in which President Donald J. Trump underscored the dire energy challenges facing the Nation due to growing resource adequacy concerns. President Trump declared a national energy emergency in Executive Order No. 14156, "Declaring a National Energy Emergency," in which he determined that the "United States' insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to our Nation's economy, national security, and foreign policy."[37] The Executive Order adds, "hostile state and non-state foreign actors have targeted our domestic energy infrastructure, weaponized our reliance on foreign energy, and abused their ability to cause dramatic swings within international commodity markets."[38] In the subsequent Executive Order No. 14262, "Strengthening the Reliability and Security of the United States Electric Grid," President Trump emphasized that "the United States is experiencing an unprecedented surge in electricity demand driven by rapid technological advancements, including the expansion of artificial intelligence data centers and increase in domestic manufacturing."[39]

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[34] *Midcontinent Indep. Sys. Operator, Inc.*, 192 FERC ¶ 61,064 (2025).

[35] *See id.* P 84.

[36] *See generally* S&P Global, *US Gas-Fired Turbine Wait Times as Much as Seven Years; Costs Up Sharply* (May 2025) ("With demand for natural gas-fired turbines in the US rapidly accelerating amid power demand growth forecasts driven by AI, manufacturing, and electrification, wait times for turbines are anywhere between one and seven years depending on the model, and costs have increased considerably, experts told Platts."), https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply.

[37] Exec. Order No. 14156, 90 Fed. Reg. 8433 (Jan. 20, 2025), https://www.federalregister.gov/documents/2025/01/29/2025-02003/declaring-a-national-energy-emergency.

[38] *Id*.

[39] Exec. Order No. 14262, 90 Fed. Reg. 15521 (Apr. 8, 2025), https://www.federalregister.gov/documents/2025/04/14/2025-06381/strengthening-the-reliability-and-security-of-the-united-states-electric-grid.

In addition, President Trump issued a White House Memo for the Secretary of Energy that emphasized the findings of Executive Order No. 14156, stating that "ensuring reliable coal supply chains and baseload power generation capacity is essential to the United States national defense . . . Without sufficient coal-fired baseload power, the United States will lack the stable electricity required to support defense installations, industrial expansion, and the high-energy demands of emerging technologies, such as artificial intelligence."[40] The President "further determine[d] that action to expand coal supply chain capacity and baseload generation availability is necessary to avert an industrial resource or critical technology item shortfall that would severely impair national defense capability."[41]

Further, the Department of Energy detailed the myriad challenges affecting the Nation's energy systems in its July 2025 "Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid," which was issued pursuant to the President's directive in Executive Order No. 14262. The Department concluded that "[a]bsent decisive intervention, the Nation's power grid will be unable to meet projected demand for manufacturing, re-industrialization, and data centers driving artificial intelligence (AI) innovation."[42]

Grid operators—including MISO itself—have also acknowledged the Nation's current energy crisis. For instance, during a March 25, 2025, hearing before the House Committee on Energy and Commerce, Jennifer Curran, Senior Vice President, Planning and Operations, MISO, testified that "the MISO region faces resource adequacy and reliability challenges due to the changing characteristics of the electric generating fleet, inadequate transmission system infrastructure, growing pressures from extreme weather, and rapid load growth."[43]

Ms. Curran also described "much stronger growth [in demand for electricity] from continued electrification efforts, a resurgence in manufacturing, and an unexpected

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[40] Memorandum from President Donald J. Trump to the Secretary of Energy (Apr. 20, 2026) (*Presidential Determination Pursuant to Section 303 of the Defense Production Act of 1950, as Amended, on Coal Supply Chains and Baseload Power Generation Capacity*), https://www.whitehouse.gov/presidential-actions/2026/04/presidential-determination-pursuant-to-section-303-of-the-defense-production-act-of-1950-as-amended-on-coal-supply-chains-and-baseload-power-generation-capacity/.

[41] *Id.*

[42] DOE, *Res. Adequacy Rep.: Evaluating the Reliability & Sec. of the U.S. Elec. Grid*, at 1 (July 2025), https://www.energy.gov/sites/default/files/2025-11/DOE%20Final%20EO%20Report%20%28REVISED%20OCT%2027%29.pdf.

[43] *Keeping the Lights On: Examining the State of Reg' Grid Reliability; Hearing Before the House Comm. on Energy & Com., Subcomm. on Energy*, 119th Cong. 5 (2025) (statement of Ms. Jennifer Curran, Senior Vice President for Planning and Operations, Midcontinent Indep. Sys. Operator), https://www.congress.gov/119/meeting/house/118040/witnesses/HHRG-119-IF03-Wstate-CurranJ-20250325.pdf.

demand for energy-hungry data centers to support artificial intelligence."[44] She added, "[a] growing reliability risk is that the rapid retirement of existing coal and gas power plants threatens to outpace the ability of new resources with the necessary operational characteristics to replace them."[45]

ORDER

FPA section 202(c)(1) provides that whenever the Secretary of Energy determines "that an emergency exists by reason of a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy," the Secretary has the authority "to require by order . . . such generation, delivery, interchange, or transmission of electric energy as in [his] judgment will best meet the emergency and serve the public interest."[46] This statutory language constitutes a specific grant of authority to the Secretary to require the continued operation of Schahfer Units 17 and 18 when the Secretary has determined that such continued operation will best meet an emergency caused by a sudden increase in the demand for electric energy or a shortage of generation capacity, or a shortage of electric energy or facilities for generation or transmission of electric energy.

As described above, the emergency conditions resulting from increasing demand and shortage from accelerated retirement of generation facilities will continue in the near term and are also likely to continue in subsequent years. This could lead to the loss of power to homes and businesses in the areas that may be affected by curtailments or power outages, presenting a risk to public health and safety.

I have determined that, to best meet the emergency arising from increased demand, determined shortage, and other causes, and serve the public interest under FPA section 202(c), Schahfer Units 17 and 18 shall be made available for operation through September 19, 2026.

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[44] *Id.* at 6.

[45] *Id.* at 7.

[46] Although the text of FPA section 202(c) grants this authority to "the Commission," section 301(b) of the Department of Energy Organization Act transferred this authority to the Secretary of the Department of Energy. *See* 42 U.S.C. § 7151(b).

Based on my determination of an emergency set forth above, I hereby order:

A. From June 22, 2026, MISO and NIPSCO shall take all measures necessary to ensure that Schahfer Units 17 and 18 are available to operate. For the duration of this Order, MISO is directed to take every step to employ economic dispatch of Schahfer Units 17 and 18 to minimize cost to ratepayers. Following the conclusion of this Order, sufficient time for orderly ramp down is permitted, consistent with industry practices. NIPSCO is directed to comply with all orders from MISO related to the availability and dispatch of Schahfer Units 17 and 18.

B. To minimize adverse environmental impacts, this Order limits operation of Schahfer Units 17 and 18 to the times and within the parameters as determined by MISO, pursuant to paragraph A. MISO shall provide a daily notification to the Department (via AskCR@hq.doe.gov) reporting whether Schahfer Units 17 and 18 have operated in compliance with the allowances contained in this Order.

C. All operations of Schahfer Units 17 and 18 must comply with applicable environmental requirements, including but not limited to monitoring, reporting, and recordkeeping requirements, to the maximum extent feasible while operating consistent with the emergency conditions. This Order does not provide relief from any obligation to pay fees or purchase offsets or allowances for emissions that occur during the emergency conditions or to use other geographic or temporal flexibilities available to generators.

D. By July 7, 2026, MISO is directed to provide the Department (via AskCR@hq.doe.gov) with information concerning the measures it has taken and is planning to take to ensure the operational availability of Schahfer Units 17 and 18 consistent with this Order. MISO shall also provide such additional information regarding the environmental impacts of this Order and its compliance with the conditions of this Order, as requested by the Department of Energy from time to time.

E. NIPSCO is directed to file with the Federal Energy Regulatory Commission any tariff revisions or waivers to effectuate this Order, as needed. Rate recovery is available pursuant to 16 U.S.C. § 824a(c).

F. This Order shall not preclude the need for Schahfer Units 17 and 18 to comply with applicable state, local, or Federal law or regulations following the expiration of this Order.

G. Because this Order is predicated on the shortage of facilities for generation of electric energy and other causes, Schahfer Units 17 and 18 shall not be considered capacity resources.

H. This Order shall be effective from June 22, 2026, through September 19, 2026, with the exception of applicable compliance obligations in paragraph D.

Issued in Washington, D.C. on this 18th Day of June 2026.

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Chris Wright
Secretary of Energy

cc: **FERC Commissioners**
Chairman Laura V. Swett
Commissioner David Rosner
Commissioner Lindsay S. See
Commissioner Judy W. Chang
Commissioner David A. LaCerte

Indiana Utility Regulatory Commissioners
Chairman Andy Zay
Commissioner Bob Deig
Commissioner Anthony Swinger
Commissioner David Veleta
Commissioner David Ziegner

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 192
June Culley Order

Department of Energy
Washington, DC 20585

Midcontinent Independent System Operator, Inc. Order No. 202-26-30
Center Point Energy
Regarding F.B. Culley Generating Station

Pursuant to the authority vested in the Secretary of Energy by section 202(c) of the Federal Power Act (FPA),[1] and section 301(b) of the Department of Energy (DOE or the Department) Organization Act,[2] and for the reasons set forth below, I hereby determine that an emergency exists in portions of the Midwest region of the United States (U.S.) due to a shortage of electric energy, a shortage of facilities for the generation of electric energy, and other causes. Issuance of this Order will meet the emergency and serve the public interest.

BACKGROUND

The F.B. Culley Generating Station ("Culley") is an electric generating facility in Warrick County, Indiana. Culley is owned and operated by CenterPoint Energy and consists of two coal-fired generation units, Unit 2 (103.7 MW) and Unit 3 (265.2 MW), with a combined name plate capacity of 368.9 MW.[3] Unit 2 and Unit 3 began operations in 1966 and 1973, respectively. Unit 2 was slated to cease operations in December 2025.[4]

Order No. 202-25-13, issued pursuant to FPA section 202(c), required that Culley Unit 2 remain in operation for 90 days, through March 23, 2026. Subsequently, Order No. 202-26-20, issued pursuant to FPA section 202(c), required the Culley Unit to remain in operation for 90 days, until June 21, 2026. These orders were based on my determination that emergency conditions existed in the region served by the Midcontinent Independent System Operator, Inc. (MISO).

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[1] 16 U.S.C. § 824a(c).

[2] 42 U.S.C. § 7151(b).

[3] U.S. Energy Info. Admin., *Form EIA-860, Schedule 3: Generator Data* (2024), https://www.eia.gov/electricity/data/eia860/.

[4] It likely would be difficult for the coal-fired units to resume operations once retired. Specifically, practical issues, such as employment, contracts, and permits, may greatly increase the timeline for resumption of operations during the period they are needed. Moreover, if CenterPoint Energy were to begin disassembling the units or other related facilities, the associated challenges would be greatly exacerbated. The costs and time of decommissioning a coal plant are extensive, and restarting such decommissioned plants would presumably cost the same as decommissioning in dollars and time, if not more. Thus, continuous operation is required in such cases so long as the Secretary determines a shortage exists and is likely to persist. *See* Jennifer Lessick, et al., *Bus. Models for Coal Plant Decommissioning*, at 9-12 (Aug. 2021), https://www.pnnl.gov/main/publications/external/technical_reports/PNNL-31348.pdf.

Specifically, I determined that MISO faced tight reserve margins due to well--documented year-round resource adequacy concerns, particularly during periods of high demand or low generation resource output.[5] I determined that the continued operation of Culley Unit 2 would provide additional generation capacity during these periods, which would help prevent the loss of power to homes and businesses that would otherwise pose a risk to public health and safety.[6] I determined that the continued operation of Culley Unit 2 was necessary to alleviate immediate and anticipated threats to reliability.[7]

My determination was based on several facts. First, in its 2024 Long-Term Reliability Assessment (LTRA), the North American Electric Reliability Corporation (NERC) notes that the MISO assessment area, which covers portions of Arkansas, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, Montana, North Dakota, South Dakota, Texas, and Wisconsin, is at an elevated risk, "because probabilistic assessments indicate above-normal generator outages during extreme weather can result in unserved energy or load loss. With uncertainty around new resource additions and existing generator retirements, MISO is also at risk of falling below [Reference Margin Levels] within the next five years."[8] Additionally, the LTRA notes that "[t]he departure of MISO's coal fleet has continued with a reduction in capacity of around 6 GW in the past year, and a projected reduction of a further 12 GW over the next five years."[9]

Second, MISO's year-round resource adequacy concerns are well-documented. In 2022, MISO requested Federal Energy Regulatory Commission (FERC) approval of its filing to revise its resource adequacy construct (including the Planning Resource Auction or PRA) to establish capacity requirements for each of the four seasons of the year rather than on an annual basis determined by peak summer demand.[10] MISO justified this revision by explaining that "Reliability risks associated with [r]esource [a]dequacy have shifted from 'Summer only' to a year-round concern."[11] MISO noted that over 60% of all "MaxGen" events (events when MISO initiates

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[5] *See*, *e.g.*, *Midcontinent Indep. Sys. Operator, Inc*, Order No. 202-25-12, at 1–4 (Dec. 23, 2025).

[6] *See*, *e.g.*, *id.*

[7] *See*, *e.g.*, *id.* at 5.

[8] N. Am. Elec Reliability Corp.*, 2024 Long-Term Reliability Assessment*, at 13 (Dec. 2024, corrected July 11, 2025), https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf.

[9] *Id.* at 44.

[10] *Midcontinent Indep. Sys. Operator, Inc.*, Transmittal Letter, FERC Dkt. No. ER22-495-000 (filed Nov. 30, 2021). FERC accepted MISO's proposed tariff revisions on August 31, 2022. *See also Midcontinent Indep. Sys. Operator, Inc.*, 180 FERC ¶ 61,141 (2022), *order on reh'g & compliance*, 182 FERC ¶ 61,096 (2023).

[11] *MISO*, Transmittal Letter, FERC Dkt. No. ER22-495-000, at 3.

emergency procedures because of concerns over the adequacy of available generation) occurred outside of the summer season.[12]

CONTINUING EMERGENCY CONDITIONS

The emergency conditions that necessitated the issuance of Order Nos. 202-25-13 and 202-26-20 continue, both in the near and long term. The production of electricity from Culley continues to be critical to maintain reliability in MISO. MISO's resource adequacy concerns were most recently demonstrated during Winter Storm Fern, when Culley operated under a cold weather alert and declared conservative operations from January 23–February 1, 2026. On January 24, MISO declared an Energy Emergency Alert (EEA) 1, as well as an EEA 2 "MaxGen" event for MISO's North and Central Regions due to generation outages, high demand, and transfer capability limits.[13] From January 21–February 1, 2026, Culley operated at roughly 30 MW almost every day.[14]

In December of 2023, MISO released an "Attributes Roadmap," in which it presented "an in-depth look at the challenges of operating a reliable bulk electric system in a rapidly transforming energy landscape.[15] Among other things, this report described changes in the time of year during which the risk of the loss of load was greatest. For the 2023/2024 Planning Year the greatest risk of loss of load was in the summer, but it is expected that by the summer of 2027, there will be an equal loss of load risk in both the summer and fall seasons. MISO also projected risk of loss of load in the winter and spring seasons; which although not as high as in the summer or fall, will nevertheless increase over time.[16]

More recently, MISO affirmed the resource adequacy problems occurring outside of its summer season in its 2024 report entitled, "*MISO's Response to the Reliability Imperative.*"[17] In a section of that report entitled, "*Risks in Non-Summer Seasons*," MISO again stressed that it has resource reliability concerns outside of the summer season.

Widespread retirements of dispatchable resources, lower reserve margins, more frequent and severe weather events and increased reliance on weather-dependent renewables and emergency-only resources have altered the region's historic risk profile,

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[12] *Id.* at 3–4.

[13] *See* MISO (@MISO_energy), X, (Jan. 24, 2026), https://x.com/MISO_energy/status/2015072060876140805?s=20.

[14] DOE, *FACT SHEET: Energy Dep't Prevented Blackouts & Saved Am. Lives During Winter Storms*, (Feb. 2026), https://www.energy.gov/articles/fact-sheet-energy-department-prevented-blackouts-saved-american-lives-during-winter-storms.

[15] MISO, *Attributes Roadmap*, *supra* note 14, at 3.

[16] *Id.* at 11.

[17] MISO, *MISO's Response to the Reliability Imperative* (Updated Feb. 2024), https://cdn.misoenergy.org/2024+Reliability+Imperative+report+Feb.+21+Final504018.pdf.

creating risks in non-summer months that rarely posed challenges in the past.[18] These MISO studies indicate that the emergency conditions caused by the loss of generation capacity in MISO extend past the summer season.

In January 2026, NERC released its 2025 Long-Term Reliability Assessment, NERC assessed that the MISO region is at high risk of energy shortfalls over the next five years, stating that it faces significant reliability challenges as "projected resource additions do not keep pace with escalating demand forecasts and announced generator retirements."[19] This determination is based on the combination of accelerating demand growth from new data centers and the retirement of existing thermal generators.[20] The 2025 Long-Term Reliability Assessment notes that "MISO's accredited thermal capacity has decreased by 8.8 GW, driven primarily by reductions in accredited capacity of existing facilities and retirements."[21] The report observes that winter peak periods are a particular concern, with projections showing "shortfalls in planned resources for winter peak periods."[22] However, NERC also concluded that "risks could expand into spring and fall generator maintenance periods when the available dispatchable generation is not enough to counter wind and solar variability when demand is high."[23]

According to NERC's 2026 Summer Reliability Assessment, load growth in the MISO region, led by data centers, "is expected to accelerate in 2027 and beyond, which may lead to increased reliability risk in the future if resource additions cannot keep pace with rising load forecasts."[24] It further notes that "[a]bove-normal summer peak load combined with low resource conditions could result in the need to employ operating mitigations (e.g., load-modifying resources) and EEAs [Energy Emergency Alerts]."[25] Since the region benefits from transmission connections with neighbors to meet extreme conditions, MISO's reliance on electricity imports will increase when extreme conditions arise.[26]

The evidence indicates that there is also a potential longer-term resource adequacy emergency in MISO. When MISO reported the results of its PRA for the 2025–26 Planning Year, it noted that "new capacity additions were insufficient to offset

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[18] *Id.* at 12.

[19] NERC, *2025 Long-Term Reliability Assessment,* at 7–8 (Jan. 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf.

[20] *Id.* at 43.

[21] *Id.* at 15.

[22] *Id*.

[23] *Id.*

[24] NERC, *2026 Summer Reliability Assessment*, at 16 (May 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_sra_2026.pdf.

[25] *Id.* at 16.

[26] *Id.* at 16.

the negative impacts of decreased accreditation, suspensions/retirements and external resources" in the northern and central zones, which include Indiana.[27]

On June 6, 2025, the Organization of MISO States (OMS) and MISO issued the results of their annual survey (OMS-MISO Survey), which reported the degree to which expected capacity resources satisfy planning reserve margin requirements.[28] The OMS-MISO Survey presented projections of resource adequacy for the summer of 2026 and subsequent years. Although the OMS-MISO Survey projected a potential capacity surplus for the summer of 2026, it also projected that at least 3.1 GW of additional generation capacity beyond currently committed generation capacity must be added to meet the projected planning reserve margin. The OMS-MISO Survey also projected that there would be insufficient capacity to meet the peak demand for electricity in each of the following four summers, increasing from a deficit of 1.4 GW in 2027 to 8.2 GW in 2030.[29] It also projected similar results for MISO's winter seasons, with a small surplus of generation capacity in 2026, followed by increasing deficits the following four years.[30]

The primary reasons for these projected deficits also are shown on the OMS-MISO Survey. Large amounts of existing generation capacity are projected to be retired each year, while, at the same time, the demand for electricity is projected to increase at an accelerating pace.[31] Although the OMS-MISO survey projects generation capacity to continue to increase in the coming years with the addition of new potential generation assets, the increase in capacity is largely offset by the projected retirements and does not keep up with the growth in demand.[32]

According to the U.S. Energy Information Administration, coal-fired electricity generation in Indiana has declined from 85% of total generation in 2014 to 42% in 2024. Since 2014, approximately 5,000 MW of coal-fired capacity in Indiana have retired, with nearly another 3,900 MW of coal-fired capacity scheduled for retirement by the end of 2028, which includes Culley's capacity.[33]

MISO has been taking steps to address these projected deficits, but the solution is years away. For example, on June 6, 2025, MISO submitted a proposal to FERC to

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[27] MISO, *Planning Res. Auction: Results for Planning Year 2025–26*, at 13 (Apr. 2025), https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%20202 50529_Corrections694160.pdf.

[28] OMS and MISO, *OMS-MISO Survey Results* (updated June 6, 2025), https:// cdn.misoenergy.org/20250606%20OMS%20MISO%20Survey%20Results%20Workshop %20Presentation702311.pdf.

[29] *Id.* at 7.

[30] *Id.* at 9.

[31] *Id.* at 7, 9.

[32] *Id*.

[33] *See U.S.* Energy Info. Admin., Indiana Analysis (Nov. 19, 2025), https://www. eia.gov/states/in/analysis.

establish an Expedited Resource Addition Study (ERAS) process to provide a framework for the expedited study of interconnection requests to address urgent resource adequacy and reliability needs in the near term. This proposal was approved by FERC on July 21, 2025.[34] The ERAS process should help expedite the construction of needed new capacity. However, resources studied under the ERAS will have commercial operation dates that are at least three years after the process begins and are provided an additional three-year grace period to commence commercial operations.[35] In addition, supply chain constraints impeding the acquisition of critical grid components, including large natural gas turbines and transformers, are likely to further hinder rapid construction and exacerbate reliability concerns.[36] Consequently, the new ERAS process is unlikely to result in the addition of any new generation capacity in the next few years.

Order Nos. 202-25-13 and 202-26-20 were preceded by executive orders on January 20, 2025, and April 8, 2025, in which President Donald J. Trump underscored the dire energy challenges facing the Nation due to growing resource adequacy concerns. President Trump declared a national energy emergency in Executive Order No. 14156, "Declaring a National Energy Emergency," in which he determined that the "United States' insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to our Nation's economy, national security, and foreign policy."[37] The Executive Order adds, "hostile state and non-state foreign actors have targeted our domestic energy infrastructure, weaponized our reliance on foreign energy, and abused their ability to cause dramatic swings within international commodity markets."[38] In the subsequent Executive Order No. 14262, "Strengthening the Reliability and Security of the United States Electric Grid," President Trump emphasized that "the United States is experiencing an unprecedented surge in electricity demand driven by rapid technological advancements, including the expansion of artificial intelligence data centers and increase in domestic manufacturing."[39]

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[34] *Midcontinent Indep. Sys. Operator, Inc.*, 192 FERC ¶ 61,064 (2025).

[35] *See id.* P 84.

[36] *See generally* S&P Global, *US Gas-Fired Turbine Wait Times as Much as Seven Years; Costs Up Sharply* (May 2025) ("With demand for natural gas-fired turbines in the US rapidly accelerating amid power demand growth forecasts driven by AI, manufacturing, and electrification, wait times for turbines are anywhere between one and seven years depending on the model, and costs have increased considerably, experts told Platts."), https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply.

[37] Exec. Order No. 14156, 90 Fed. Reg. 8433 (Jan. 20, 2025) (*Declaring a National Energy Emergency*), https://www.federalregister.gov/documents/2025/01/29/2025-02003/declaring-a-national-energy-emergency.

[38] *Id*.

[39] Exec. Order No. 14262, 90 Fed. Reg. 15521 (Apr. 8, 2025), https://www.federalregister.gov/documents/2025/04/14/2025-06381/strengthening-the-reliability-and-security-of-the-united-states-electric-grid.

In addition, President Trump issued a White House Memo for the Secretary of Energy that emphasized the findings of Executive Order No. 14156, stating that "ensuring reliable coal supply chains and baseload power generation capacity is essential to the United States national defense . . . . Without sufficient coal-fired baseload power, the United States will lack the stable electricity required to support defense installations, industrial expansion, and the high-energy demands of emerging technologies, such as artificial intelligence."[40] The President "further determine[d] that action to expand coal supply chain capacity and baseload generation availability is necessary to avert an industrial resource or critical technology item shortfall that would severely impair national defense capability."[41]

Further, the Department of Energy detailed the myriad challenges affecting the Nation's energy systems in its July 2025 "Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid," which was issued pursuant to the President's directive in Executive Order No. 14262. The Department concluded that "[a]bsent decisive intervention, the Nation's power grid will be unable to meet projected demand for manufacturing, re-industrialization, and data centers driving artificial intelligence (AI) innovation."[42]

Grid operators—including MISO itself—have also acknowledged the Nation's current energy crisis. For instance, during a March 25, 2025 hearing before the House Committee on Energy and Commerce, Jennifer Curran, Senior Vice President, Planning and Operations, MISO, testified that "the MISO region faces resource adequacy and reliability challenges due to the changing characteristics of the electric generating fleet, inadequate transmission system infrastructure, growing pressures from extreme weather, and rapid load growth."[43]

Ms. Curran also described "much stronger growth [in demand for electricity] from continued electrification efforts, a resurgence in manufacturing, and an unexpected

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[40] Memorandum from President Donald J. Trump to the Secretary of Energy (Apr. 20, 2026) ("*Presidential Determination Pursuant to Section 303 of the Defense Production Act of 1950, as Amended, on Coal Supply Chains and Baseload Power Generation Capacity"*, https://www.whitehouse.gov/presidential-actions/2026/04/presidential-determination-pursuant-to-section-303-of-the-defense-production-act-of-1950-as-amended-on-coal-supply-chains-and-baseload-power-generation-capacity/.

[41] *Id.*

[42] DOE, *Res. Adequacy Rep.: Evaluating the Reliability & Sec. of the U.S. Elec. Grid*, at 1 (July 2025), https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%29.pdf.

[43] *Keeping the Lights On: Examining the State of Reg'l Grid Reliability Before the House Comm. on Energy & Commerce*, Subcomm. on Energy, 119th Cong., at 5 (Mar. 25, 2025) (statement of Ms. Jennifer Curran, Senior Vice President for Planning and Operations, Midcontinent Indep. Sys. Operator), https://www.congress.gov/119/meeting/house/118040/witnesses/HHRG-119-IF03-Wstate-CurranJ-20250325.pdf.

demand for energy-hungry data centers to support artificial intelligence."[44] She added, "[a] growing reliability risk is that the rapid retirement of existing coal and gas power plants threatens to outpace the ability of new resources with the necessary operational characteristics to replace them."[45]

ORDER

FPA section 202(c)(1) provides that whenever the Secretary of Energy determines "that an emergency exists by reason of a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy," the Secretary has the authority "to require by order . . . such generation, delivery, interchange, or transmission of electric energy as in [his] judgment will best meet the emergency and serve the public interest."[46] This statutory language constitutes a specific grant of authority to the Secretary to require the continued operation of Culley Unit 2 when the Secretary has determined that such continued operation will best meet an emergency caused by a sudden increase in the demand for electric energy or a shortage of generation capacity, or a shortage of electric energy or facilities for generation or transmission of electric energy.

As described above, the emergency conditions resulting from increasing demand and shortage from accelerated retirement of generation facilities will continue in the near term and are also likely to continue in subsequent years. This could lead to the loss of power to homes and businesses in the areas that may be affected by curtailments or power outages, presenting a risk to public health and safety.

I have determined that, to best meet the emergency arising from increased demand, determined shortage and other causes, and serve the public interest under FPA section 202(c), Culley Unit 2 shall be made available for operation through September 19, 2026.

[44] *Id.* at 6.

[45] *Id.* at 7.

[46] Although the text of FPA section 202(c) grants this authority to "the Commission," section 301(b) of the Department of Energy Organization Act transferred this authority to the Secretary of the Department of Energy. *See* 42 U.S.C. § 7151(b).

Based on my determination of an emergency set forth above, I hereby order:

A. From June 22, 2026, MISO and CenterPoint Energy shall take all measures necessary to ensure that Culley Unit 2 is available to operate. For the duration of this Order, MISO is directed to take every step to employ economic dispatch of Culley Unit 2 to minimize cost to ratepayers. Following the conclusion of this Order, sufficient time for orderly ramp down is permitted, consistent with industry practices. CenterPoint Energy is directed to comply with all orders from MISO related to the availability and dispatch of Culley Unit 2.

B. To minimize adverse environmental impacts, this Order limits operation of Culley Unit 2 to the times and within the parameters as determined by MISO, pursuant to paragraph A. MISO shall provide a daily notification to the Department (via AskCR@hq.doe.gov) reporting whether Culley Unit 2 has operated in compliance with the allowances contained in this Order.

C. All operations of Culley Unit 2 must comply with applicable environmental requirements, including but not limited to monitoring, reporting, and recordkeeping requirements, to the maximum extent feasible while operating consistent with the emergency conditions. This Order does not provide relief from any obligation to pay fees or purchase offsets or allowances for emissions that occur during the emergency conditions or to use other geographic or temporal flexibilities available to generators.

D. By July 7, 2026, MISO is directed to provide the Department (via AskCR@hq.doe.gov) with information concerning the measures it has taken and is planning to take to ensure the operational availability of Culley Unit 2 consistent with this Order. MISO shall also provide such additional information regarding the environmental impacts of this Order and its compliance with the conditions of this Order, as requested by the Department of Energy from time to time.

E. CenterPoint Energy is directed to file with the Federal Energy Regulatory Commission any tariff revisions or waivers to effectuate this Order, as needed. Rate recovery is available pursuant to 16 U.S.C. § 824a(c).

F. This Order shall not preclude the need for Culley Unit 2 to comply with applicable state, local, or Federal law or regulations following the expiration of this Order.

G. Because this Order is predicated on the shortage of facilities for generation of electric energy and other causes, Culley Unit 2 shall not be considered a capacity resource.

H. This Order shall be effective from June 22, 2026, through September 19, 2026, with the exception of applicable compliance obligations in paragraph D.

Issued in Washington, D.C. on this 18th Day of June, 2026.

_____
Chris Wright
Secretary of Energy

cc: **FERC Commissioners**
Chairman Laura V. Swett
Commissioner David Rosner
Commissioner Lindsay S. See
Commissioner Judy W. Chang
Commissioner David A. LaCerte

Indiana Utility Regulatory Commissioners
Chairman Andy Zay
Commissioner Bob Deig
Commissioner Anthony Swinger
Commissioner David Veleta
Commissioner David Ziegner

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 193
PIOs' April Rehearing Request

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator (MISO) and Northern Indiana Public Service Company LLC	)	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator (MISO) and CenterPoint Energy Indiana South	)	Order No. 202-26-20

Motion to Intervene and Request for Rehearing and Stay of
Sierra Club, Citizens Action Coalition of Indiana, Just Transition Northwest Indiana, Hoosier Environmental Council, Environmental Law and Policy Center, and Public Citizen (collectively, "Public Interest Organizations" or "PIOs")

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I. INTRODUCTION

The Department of Energy ("Department") is unlawfully using Section 202(c) of the Federal Power Act, 16 U.S.C. § 824a(c), to prevent the retirement of two coal-fired power plants in Indiana: Units 17 and 18 of the R.M. Schahfer Generating Station ("Schahfer") and Unit 2 of the F.B. Culley Generating Station ("Culley 2") (collectively, the "Plants"), which are very expensive and very toxic to operate. The Department is acting pursuant to a new and unprecedented policy to exceed its carefully constrained emergency authority under Section 202(c) in order to prevent coal plant retirements. The policy is unlawful because Section 202(c) applies only to imminent, unexpected shortfalls, not to the Department's preference for specific types of energy generation.

NIPSCO and Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South ("CenterPoint Indiana"), which owns Culley 2, determined pursuant to years-long, state-mandated integrated resource planning ("IRP") processes that the Plants are no longer needed to serve customer demand past 2025. Accordingly, NIPSCO and CenterPoint Indiana long ago resolved to close the Plants in December 2025.

That long-anticipated transition was disrupted at the end of last year when the Department issued two 90-day orders under Section 202(c) of the Federal Power Act, 16 U.S.C. § 824a(c). See Order No. 202-25-12 (Exhibit 1, the "December Schahfer Order") and Order No. 202-25-13 (Exhibit 2, the "December Culley Order") (collectively, the "December Orders"). Neither of the December Orders offered any lawful basis, rational reasoning, or legitimate evidentiary support for a near-term or long-term emergency justifying the invocation of Section 202(c). And now, despite Public Interest Organizations refuting the Department's mischaracterizations or misunderstandings of the sources on which it relies (Ex. 168, PIOs' January Rehearing Request), the Department has renewed both orders. *See* Order No. 202-26-19 (the "March Schahfer Order") and Order No. 202-26-20 (the "March Culley Order") (collectively, the "Orders"). In its quest to keep the affected coal power plants operating, regardless of whether there is an actual shortage the Plants are needed to address, the Department has declined to consider a mountain of evidence contrary to its position. The policy is also unlawful in substance because the carefully constrained emergency authority of Section 202(c) applies only to imminent, unexpected shortfalls, not to the Department's preference for specific types of energy generation.

The Department justifies these intrusive and unnecessary orders by alleging concerns about resource adequacy and reliability, but its concerns are based on selective quotations of some documents, elementary misunderstandings or

mischaracterizations of additional documents, and disregard of governing law to engage in a forbidden effort to usurp others' authority. Additionally, the Department fails to reconcile its concerns with the Department's existing authorizations to export power from MISO in which, for instance, the Department finds that markets in the area are sufficiently robust to make supplies available and that multi-layered and comprehensive reliability processes incentivize maintenance of system resources. Moreover, the concerns expressed in the Orders are primarily not focused on the actual 90-day period at issue (*i.e.*, the period starting on March 23, 2026 and extending to June 21, 2026). The evidence shows there is every reason to believe that the actors with authority over resource adequacy and reliability—FERC, NERC, MISO, Indiana regulators, the electric utility owners, and others—have provided for adequate resources and reliability in the Spring 2026 and Summer 2026 seasons, in all arguably relevant geographies, and will continue doing so going forward..

The Orders will cause (just as the December Orders have caused) significant harm. The significant cost of running the Plants, hundreds of thousands of dollars a day, are likely to be borne by households and families in Indiana and ten nearby states. *See infra* sec. IV.C.3; Ex. 5 (Synapse Report); *Northern Indiana Public Service Company LLC v. MISO,* 194 FERC ¶ 61,215 at PP 36-37 (2026); *Southern Indiana Gas and Electric Company v. MISO,* 194 FERC ¶ 61,214 at PP 34-35 (2026). The Department and the federal administration admit that "[a]ll costs" incurred by an affected power plant under a Section 202(c) emergency order "end up on ratepayers." *See* Laura Sanicola, Barrons, *Who's Paying to Keep Coal Plant Alive? All Electricity Customers, Trump Advisor Says* (Jan. 14, 2026), https://www.msn.com/en-us/money/markets/who-s-paying-to-keep-coal-plant-alive-all-electricity-customers-trump-advisor-says/ar-AA1UdRHI; Orders at 9 (each stating that "[r]ate recovery is available")

And there are other more deadly costs as well. Schahfer and Culley 2 are dirty, old plants that spew pollution into the air and into the Kankakee and Ohio Rivers. *See infra* sec. IV.C.3. Operation of all these units leads to premature deaths and deepens the harms to communities already injured by decades of environmental pollution. *See id.*

Public Interest Organizations thus respectfully request that the Department grant intervention; stay the Orders; grant rehearing and rescind the Orders (and

any renewals of the Orders); and allow the two Indiana Plants at issue—Schahfer and Culley 2—to retire as planned.[1]

II. Statement of Issues and Specification of Error

The undersigned Public Interest Organizations move to intervene and request rehearing and a stay of both Orders pursuant to Section 313(a) of the Federal Power Act, 16 U.S.C. § 825*l*(a), and the applicable rules of practice and procedure, 18 C.F.R. §§ 385.203, .212, .214, .713; *see* Ex. 8 at PDF 2 (Cooke Email to Alle-Murphy) (recommending that "a party seeking rehearing can look for procedural guidance to [Federal Energy Regulatory Commission's ("FERC")] Rules of Practice and Procedure, 18 CFR Part 385.").[2] Public Interest Organizations' motion and requests are based upon the following errors and issues:

A. The Department has not demonstrated that an emergency exists in any portion of MISO as required by Section 202(c) of the Federal Power Act; nor has the Department demonstrated that an emergency exists as defined in the implementing regulations for Section 202(c). *See, e.g.*, 16 U.S.C §§ 824(a)–(b),

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[1] Because the two Orders employ nearly identical language and reasoning and are both addressed to power generating plants in the Indiana zone of the MISO transmission grid, Public Interest Organizations are here submitting a single Request for Rehearing applicable to each of the Orders.

[2] Until sometime after June 18, 2025, the Department maintained a webpage with procedures for intervention and rehearing requests. U.S. Dep't of Energy, *DOE 202(c) Order Rehearing Procedures* (visited June 18, 2025), https://www.energy.gov/ceser/doe-202c-order-rehearing-procedures (attached as Ex. 30) [hereinafter "DOE Rehearing Procedures"]. The Department maintains another website which currently states, "All public comments and requests related to FPA section 202(c) should be sent via email to AskCR@hq.doe.gov. . . . Additional information about 202(c) procedures, if necessary, will be announced on this page. The provision of this process for submission of correspondence or comments on any pending application is for purposes of ensuring the receipt by the appropriate office and personnel within the Department. Establishment of this email address does not establish a 'docket,' and those submitting correspondence do not constitute parties or intervenors to any proceeding." U.S. Dep't of Energy, *DOE's Use of Federal Power Act Emergency Authority* (last visited Jan. 22, 2025), https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority (attached as Ex. 74) [hereinafter "DOE 202(c) Webpage"]. Public Interest Organizations' instant motion and requests are also pursuant to the DOE 202(c) Webpage and the DOE Rehearing Procedures.

824a(a)–(c); 10 C.F.R. §§ 205.371–.375; *Emergency Interconnection of Elec. Facilities and the Transfer of Elec. to Alleviate an Emergency Shortage of Elec. Power,* 46 Fed. Reg. 39984 (Aug. 6, 1981); *Hughes v. Talen Energy Mktg., LLC*, 578 U.S. 150 (2016); *FDA v. Brown & Williamson Tobacco Corp.*, 529 U.S. 120 (2000); *Jarecki v. G.D. Searle & Co.*, 367 U.S. 303 (1961); *Citizens Action Coal. v. FERC*, 125 F.4th 229 (D.C. Cir. 2025); *Conn. Dep't of Pub. Util. Control v. FERC*, 569 F.3d 477 (D.C. Cir. 2009); *Alcoa Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009); *Cal. Indep. Sys. Op. Corp. v. FERC*, 372 F.3d 395 (D.C. Cir. 2004); *Otter Tail Power Co. v. Federal Power Commission*, 429 F.2d 232 (8th Cir. 1970); *Richmond Power & Light v. FERC*, 574 F.2d 610, 615 (D.C. Cir. 1978); *Duke Power Co. v. Fed. Power Com.,* 401 F.2d 930, 938 (D.C. Cir. 1968).

B. Even if the emergency described by the Orders did exist—it does not—the Department has not demonstrated a reasoned basis for its determination that additional dispatch of Schahfer and Culley 2 is necessary to "best meet the emergency and serve the public interest." See, e.g., 16 U.S.C. § 824a(c); 10 C.F.R. §§ 205.373, 205.375; Dep't of Homeland Sec. v. Regents of the Univ. of Calif., 591 U.S. 1 (2020); Entergy Corp. v. Riverkeeper, Inc., 556 U.S. 208 (2009); *Allentown Mack Sales & Service, Inc. v. NLRB,* 522 U.S. 359 (1998); *Motor Vehicle Mfrs. Ass'n of the U.S. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29 (1983); *NAACP v. Fed. Power Comm'n*, 425 U.S. 662 (1976); *Gulf States Utils. Co. v. Fed. Power Comm'n*, 411 U.S. 747 (1973); *Otter Tail Power Co. v. United States*, 410 U.S. 366 (1973); *California v. Fed. Power Comm'n*, 369 U.S. 482 (1962); *Pa. Water & Power Co. v. Fed. Power Comm'n*, 343 U.S. 414 (1952); *Nat'l Shooting Sports Found., Inc. v. Jones*, 716 F.3d 200 (D.C. Cir. 2013); *Chamber of Com. of the U.S. v. Secs. & Exch. Comm'n*, 412 F.3d 133 (D.C. Cir. 2005); *Sierra Club v. Env't. Prot. Agency*, 353 F.3d 976, 980 (D.C. Cir. 2004); *Wabash Valley Power Ass'n, Inc. v. FERC*, 268 F.3d 1105 (D.C. Cir. 2001).

C. The Orders' availability requirements and override of Schahfer and Culley 2's federal tariff-defined capacity treatment each exceed the Department's authority and are unreasoned. *See, e.g.*, 16 U.S.C. §§ 824(a)–(b), 824a(b)–(c); *Gallardo v. Marstiller*, 596 U.S. 420 (2022); *Hughes v. Talen Energy Mktg., LLC*, 578 U.S. 150 (2016); *FERC v. Elec. Power Supply Ass'n*, 577 U.S. 260 (2016); *Gomez-Perez v. Potter*, 553 U.S. 474 (2008); *Allentown Mack Sales & Service, Inc. v. NLRB*, 522 U.S. 359 (1998); *Fed. Power Comm'n v. Fla. Power & Light Co.*, 404 U.S. 453 (1972); *Conn. Light & Power v. Fed. Power Comm'n*, 324 U.S. 515 (1945); *Conn. Dep't of Pub. Util. Control v. FERC*, 569 F.3d 477 (D.C. Cir. 2009).

D. The Department has unlawfully failed to ensure that the Orders require generation of electric energy only during hours necessary to meet the emergency and serve the public interest, that operations are consistent with any applicable environmental laws and regulations to the maximum extent practicable, and that any adverse environmental impacts are minimized. *See, e.g.*, 16 U.S.C. § 824a(c)(2); *Kingdomware Techs., Inc. v. United States*, 579 U.S. 162 (2016); *Fla. Power & Light Co. v. FERC*, 88 F.3d 1239 (D.C. Cir. 1996); *City of New Orleans v. FERC*, 67 F.3d 947 (D.C. Cir. 1995); Ex. 9 (DOE Order No. 202-22-4); Ex. 6 (DOE Order No. 202-17-4 Summary of Findings); Ex. 110 (DOE Order No. 202-24-1); Ex. 160 (Department Order No. 202-26-01); Ex. 161 (Department Order No. 202-26-01A)..

III. INTERVENORS' INTERESTS

As further discussed below, each of the Public Interest Organizations has interests that may be directly and substantially affected by the outcome of these proceedings. Each party may therefore intervene in these proceedings. 18 C.F.R. § 385.214; *see* Ex. 30 (DOE Rehearing Procedures); Ex. 74 (DOE 202(c) Webpage); Ex. 8 (Cooke Email to Alle-Murphy).

The Public Interest Organizations also demonstrate concrete injuries arising from the Orders that are redressable by a favorable outcome. Each organization is therefore aggrieved by the Department's Orders and may properly apply for rehearing. *See* 16 U.S.C. § 825*l*(a); *Wabash Valley Power Ass'n, Inc. v. FERC*, 268 F.3d 1105, 1112 (D.C. Cir. 2001); 18 C.F.R. §§ 385.203, 385.713; Ex. 30 (DOE Rehearing Procedures); Ex. 74 (DOE 202(c) Webpage); Ex. 8 (Cooke Email to Alle-Murphy).

A. Sierra Club

As of March 2026, over 8,000 Sierra Club members reside in Indiana. Sierra Club members are harmed by pollution produced by operating the Culley and Schahfer coal units. Sierra Club has over 900 members in Jasper County, Indiana, where Schahfer is located, and the adjoining counties. Sierra Club has approximately 300 members in Warrick County, Indiana, where Culley is located, and the adjoining counties. The Orders to operate these Plants beyond their planned retirement date will subject Sierra Club members to additional air and water pollution in the areas where they live, work, and recreate. In addition, Sierra Club members include people who pay for electricity from CenterPoint Indiana and NIPSCO.

Sierra Club has demonstrated an organizational commitment to the interests of reducing pollution and harm from these coal-burning power plants. Sierra Club's Beyond Coal Campaign seeks to reduce the pollution currently being produced by coal-burning power plants such as Culley and Schahfer, and to reduce energy bills by ensuring that ratepayers do not fund the cost of continuing to operate uneconomic coal plants like Culley and Schahfer. To those ends, Sierra Club has advocated for the retirement of the Culley plant in multiple regulatory proceedings, including CenterPoint Indiana's 2016, 2020, 2023, and 2025 Integrated Resource Plan stakeholder processes, a fuel adjustment clause docket related to forced outages at the Culley plant, and electric rate cases. Sierra Club has also submitted comments to the Indiana Department of Environmental Management on draft air and water permits for the Culley plant, advocating for more stringent pollution requirements. Sierra Club has advocated for the retirement of Schahfer in several regulatory proceedings, including a certificate of public necessity proceeding for retrofits at the Schahfer plant in 2017, and NIPSCO's 2014, 2016, and 2018 Integrated Resource Plan stakeholder processes. In 2019, Sierra Club signed a multi-party settlement in NIPSCO's electric rate case that adjusted the depreciation schedule for the Schahfer plant to align with a 2023 retirement and that provided that electric customers were to receive a bill credit upon the plant's retirement.

Sierra Club has invested staff and volunteer time, as well as significant financial resources to hire experts, to advocate for the retirement of Culley and Schahfer. Sierra Club has submitted hundreds of individual comments to the utilities and Indiana Commission advocating for the retirement of these coal units. By denying these and other benefits of the Culley 2 and Schahfer Plants' retirements, the Orders harm Sierra Club and its members.

B. Citizens Action Coalition of Indiana

Citizens Action Coalition of Indiana, Inc. ("CAC") is Indiana's oldest and largest consumer and environmental advocacy organization. Since 1974, CAC has helped Hoosiers save more than $10 billion in excess utility charges. CAC advocates on behalf of Hoosiers on issues regarding energy policy, utility reform, health care, pollution prevention, and family farms. CAC's activities include research, public education, organizing citizens, lobbying, intervening in utility cases before the Indiana Utility Regulatory Commission ("IURC"), and litigating when necessary. CAC engages in rate cases, cost recovery proceedings, certificates of public convenience and necessity proceedings, demand side management proceedings, and numerous other matters impacting the cost or reliability of Hoosiers' energy services, including numerous proceedings associated with the planned retirements of Schahfer and Culley 2. CAC also participates in the rigorous Integrated Resource

Plan stakeholder processes required for Indiana's jurisdictional electric utilities submitting integrated resource plans every three years according to Indiana Code § 8-1-8.5-3(e)(2).

C. Just Transition Northwest Indiana

Just Transition Northwest Indiana ("JTNWI"), a nonprofit corporation chartered under the laws of Indiana, is a grassroots environmental justice organization serving the Northwest Indiana region, primarily Lake, Porter, LaPorte, and Jasper Counties, that centers on organizing and base-building activities. JTNWI's mission is to educate and organize Northwest Indiana communities and workers, give voice to our shared stories, and support a just transition to a regenerative economy that protects the environment, climate, and future generations. Since the organization's formation in 2020, JTNWI has worked tirelessly on issues related to utility affordability, pollution response and accountability, and industrial decarbonization within the NIPSCO service territory, including Wheatfield and Jasper County, Indiana, where the R.M. Schahfer Generating Station is located, communities JTNWI serves whose health and livelihoods will be adversely impacted by the 202(c) emergency order. JTNWI works across the local, state, and federal levels, including advocating for coal ash waste clean closures, plant retirements, and just transition planning in fossil fuel-impacted communities in the region, and is actively involved in public comment periods and interventions in NIPSCO electric rate cases before the Indiana Utility Regulatory Commission and in environmental permits with the Indiana Department of Environmental Management and the United States Environmental Protection Agency.

D. Hoosier Environmental Council

Hoosier Environmental Council, Inc. ("HEC") is a 501(c)(3), non-profit, public interest environmental policy and advocacy organization chartered under the laws of Indiana. Since its formation in 1983, HEC has been and continues to be committed to protecting Indiana's air, land, waterways and wildlife habitat through initiatives in education, research, technical assistance, public policy advocacy, and legal action including the enforcement of federal and state laws that protect Indiana's natural resources. To further its mission, HEC actively seeks federal and state agency implementation and enforcement of environmental laws and regulations, and when necessary initiates enforcement actions on behalf of HEC and its members. For more than 40 years, HEC has advocated for measures to reduce the harm that coal-fired power does to land, air, water, and human health. HEC has been active regarding the Schahfer and Culley 2 sites, as well as many current and former coal-fired power plants, advocating on behalf of its members for safe closure of coal-fired power stations and proper closure of coal combustion

residual waste ponds and landfills. HEC's interest is in protection of air, water and land quality at and around these sites.

E. Public Citizen

Established in 1971, Public Citizen is a national research and advocacy organization representing the interests of household consumers. Public Citizen has members and supporters in every state, including those who pay electric utility bills in Indiana and the Midwest. Public Citizen is active before the Federal Energy Regulatory Commission promoting just and reasonable rates, and in supporting efforts for utilities to be accountable to the public. Financial details about the organization are on its website. Public Citizen, Annual Reports, www.citizen.org/about/annualreport.

F. Environmental Law and Policy Center

Environmental Law and Policy Center ("ELPC") is a not-for-profit environmental organization headquartered in Chicago with members and contributors throughout the Midwest, including in Indiana. Among other things, ELPC advocates before the Indiana Utility Regulatory Commission and the Federal Energy Regulatory Commission for clean, reliable energy generation in order to reduce ratepayer costs and improve environmental outcomes. ELPC has participated in IURC cases and matters involving NIPSCO and other Indiana utilities. See, *e.g.*, IURC Cause No. 44688 (NIPSCO 2015 Rate Case); IURC Cause No. 45378 (Vectren Distributed Generation Rider); Duke Energy Indiana 2024 IRP.

IV. BACKGROUND

A. The Primary Actors in the Electric Industry Already Protect Resource Adequacy Without Intrusion from the Department.

1. The Federal Energy Regulatory Commission Regulates Wholesale Electricity Markets and Mechanisms that Acquire Adequate Resources.

FERC regulates wholesale sales and transmissions of electric energy in interstate commerce. 16 U.S.C. § 824(b)(1). Federal authority over the electric grid dates back at least to 1935, when the Federal Power Act became law and the Federal Power Commission administered the Act.

The Federal Power Act did not give the federal agency plenary authority over the electric grid. Instead, Congress provided that federal regulation shall "extend only to those matters which are not subject to regulation by the States" and

provided that "[t]he Commission" does not have jurisdiction, "except as specifically provided in [the Federal Power Act], over facilities used for the generation of electric energy." *Id.* at § 824(a)–(b)(1). As such, authority over generation facilities belongs to the states. *See id.*

In 1977, through the Department of Energy Organization Act, Congress reorganized the agencies that administer the Federal Power Act. Congress created the Department of Energy and FERC. 42 U.S.C. §§ 7131, 7171(a). Congress also transferred certain functions of "the Commission" in the Federal Power Act to the Department and other functions to FERC, thereby abolishing the Federal Power Commission. *See id.* §§ 7151(b), 7172(a)(1). FERC retained authority over rates and charges for the transmission of electric energy or sale of electric energy at wholesale (in both cases, in interstate commerce), and the non-emergency interconnection of facilities for the generation, transmission, and sale of electric energy. *Id.* § 7172(a)(1)(B); 16 U.S.C. § 824(a). The Department's authority over functions of "the Commission" in the Federal Power Act includes functions under some subsections of Section 202 of the Act. *See* 42 U.S.C. § 7151(b). The 1977 reorganization did not expand the role of the "the Commission" at the expense of state authority or shrink states' authority over generation facilities. *See, e.g.*, *id.* § 7113 ("Nothing in this chapter shall affect the authority of any State over matters exclusively within its jurisdiction.").

As part of its regulatory oversight, FERC has promoted the role of nonprofit entities, known as Independent System Operators or Regional Transmission Organizations, in bulk power system operations and planning. *See FERC v. Elec. Power Supply Ass'n*, 577 U.S. 260, 267 (2016); *Regional Transm. Orgs.*, Order No. 2000, 65 Fed. Reg. 810, 811 (Jan. 6, 2000); *Promoting Wholesale Competition Through Open Access Non-Discriminatory Transm. Servs. by Pub. Utils. and Recovery of Stranded Costs by Pub. Utils. and Transm. Utils.*, Order No. 888, 61 Fed. Reg. 21540, 21542 (May 10, 1996). FERC generally regulates these entities pursuant to its authority over rates and charges for wholesale sales and transmissions of electric energy. *See, e.g.*, Order No. 2000, 65 Fed. Reg. at 811. These entities, referred to here as ISOs or RTOs, perform a variety of functions, including:

- Ensuring the electric grid operates reliably in a defined geographic footprint;
- Balancing supply and demand instantaneously and maintaining sufficient operating reserves;
- Dispatching system resources as economically as possible;

- Coordinating system dispatch with neighboring balancing authority areas;
- Planning for transmission in its footprint;
- Coordinating system development with neighboring systems and participating in regional planning efforts; and
- Providing non-discriminatory transmission access.

Ex. 46 at 53 (FERC Energy Primer). Some ISOs "also operate capacity markets, which, along with underlying resource adequacy rules, ensure sufficient capacity is available." *Id.* at 68.

Independent System Operators now span much of the country, excluding portions of the Southeast, Southwest, and Northwest regions of the country. *See id.* at 37. The map in Figure 1 below depicts the geographic footprint of the various ISOs.

***Figure 1**: Boundary Areas of RTOs and ISOs*

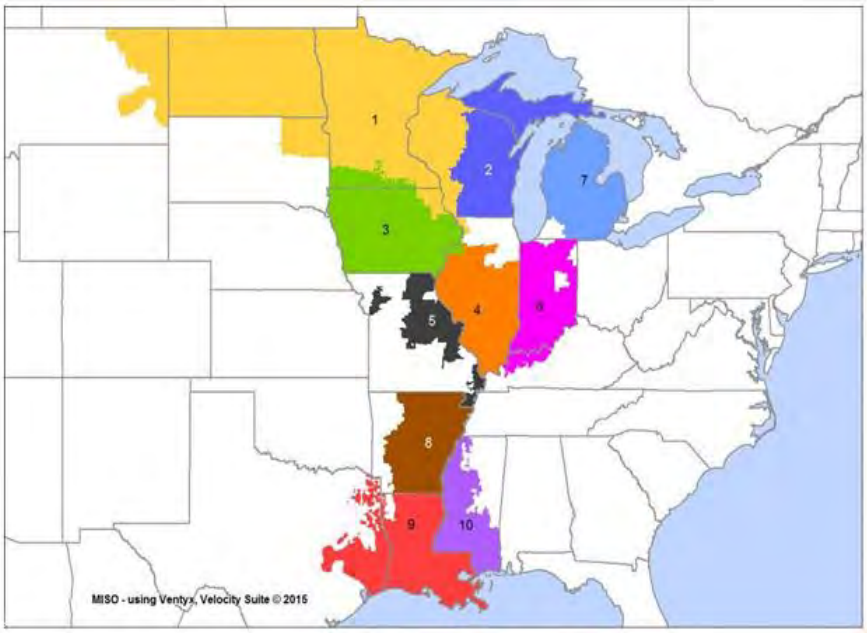


Source: Ex. 46 at 67 (FERC Energy Primer).

2. *MISO Protects Reliability and Resource Adequacy Through FERC-Regulated Reserve Margin Requirements, a Residual Capacity Auction, and Retirement Approvals.*

MISO is an Independent System Operator and the grid operator for territory stretching roughly from North Dakota to Michigan and down to Louisiana. This territory is organized into zones numbered 1 through 10, as shown in MISO's FERC-approved tariff and reproduced in Figure 2 below.

***Figure 2**: MISO Local Resource Zones 1–10*



Source: Ex. 75 (MISO Tariff Zonal Map).

MISO implements resource adequacy standards across its territory to ensure it achieves a level of grid reliability meeting both industry standards and those of the North American Electric Reliability Corporation ("NERC"). To meet its resource adequacy requirements, MISO utilizes a series of interrelated mechanisms that both measure current and future system needs and help the utilities in its region secure the resources that best meet those needs at least cost. *See generally* Ex. 46 at 66–75, 87–90 (FERC Energy Primer); Ex. 3 at 8–9 (EFG Report).

i. Reserve Margin Requirements.

The foundation of MISO's resource adequacy implementation process is its Loss of Load Expectation ("LOLE") study, which measures whether available generation capacity is capable of meeting load demand under various conditions, including low probability but high impact events (such as extreme weather). *See generally* Ex. 38 (MISO LOLE Presentation). MISO runs its LOLE study every year, based on the latest available data. It utilizes a systemic model, taking inputs from the past thirty years of weather data as well as resource performance characteristics from a broad range of operating conditions. Using this wealth of information, MISO then runs thousands of simulations looking to future years. Each of the simulations examines the system at every individual hour of each year being studied. These simulations identify circumstances that could most stress the system, while also predicting how the system's fleet of resources will perform. *See* Ex. 58 (MISO Tariff Module E-1);

Ex. 38 (MISO LOLE Presentation); Ex. 81 at 47-54 (Joundi Testimony). MISO runs this model annually, based on the latest available data.

MISO uses its LOLE study results in conjunction with its system-wide peak demand forecast, which it develops from projections provided by each of the load-serving entities within its territory. It combines these inputs to determine how much generating capacity is required to meet MISO's industry-standard goal of expecting no more than one day with a loss of load event every ten years. *See* Ex. 10 at 2–5 (Grid Strategies June Report). The result of this calculation is a reasonable buffer of extra capacity to account for potential emergencies and other conditions, which is known as the regional Planning Reserve Margin ("Reserve Margin"). The Reserve Margin, stated as a percentage, reflects the amount of generating capacity that must be procured in each season to meet resource adequacy standards across the region. MISO develops a separate Reserve Margin for each season of the year. An illustrative calculation of a Reserve Margin is below.

Illustrative Reserve Margin Calculation

Expected Peak Demand	100,000 MW
Extra Buffer	7,000 MW
Reserve Margin	**7%**

After developing the system-wide Reserve Margin, MISO uses it to convert the peak demand projection for each zone into a capacity requirement (in accredited megawatts, or "MW") that each zone must meet for each season. The requirement for each zone is known as that zone's Planning Reserve Margin Requirement ("Reserve Margin Requirement"), which is the megawatt capacity that must be procured for each zone. These megawatts can come from inside or outside the zone, so long as they are deliverable to the zone. *See* Ex. 3 at 8–9 (EFG Report).

As with the zonal calculation, MISO also converts each individual load-serving entity's projected peak demand into a capacity requirement using the system-wide Reserve Margin. A load-serving entity is, like NIPSCO and CenterPoint Indiana, an entity that "has undertaken an obligation to serve [l]oad for end-use customers by statute, franchise, regulatory requirement or contract." *See* MISO's FERC-Approved Tariff at Module A (as currently effective), https://etariff.ferc.gov/TariffBrowser.aspx?tid=1162 (defining "Load Serving Entity"). And the Reserve Margin Requirement for each zone is, roughly speaking, the sum of all load-serving entities' obligations in that zone.

Finally, MISO assigns to each individual resource a capacity value based on MISO's conservative estimate of how likely that generator is to be able to provide energy during peak net demand conditions. The purpose of this estimate is to determine a percentage of resources' maximum capacity (their "accredited capacity")

that can be used by load-serving entities or in the Planning Resource Auction to achieve Reserve Margin Requirements, and it reflects that resources cannot always ensure that they will operate at their maximum possible capacity. Generally speaking, MISO's approach combines probabilistic modeling with historic and unit-specific performance. Through the capacity accreditation process, MISO fully accounts for the limitations of each resource's ability to contribute to MISO's resource adequacy during peak demand conditions or during times of overall system stress (*e.g.*, when extreme weather affects unit performance). And MISO's capacity accreditation rules are regulated and overseen by FERC. *See, e.g.*, *Midcontinent Indep. Sys. Op., Inc.*, 180 FERC ¶ 61,141, at P 1 (2022) (approving MISO's seasonal resource adequacy construct); *see also Midcontinent Indep. Sys. Op., Inc.*, 189 FERC ¶ 61,065, at P 1 (2024) (approving new methodology applicable to 2028–2029 delivery year).

Once MISO (1) establishes the regional Reserve Margin, (2) converts it to a Reserve Margin Requirement for each zone using peak demand projections, (3) apportions each zone's Reserve Margin Requirement among load-serving entities, and (4) determines all eligible resources' accredited capacity, the load-serving entities must meet their capacity obligations. *See* Ex. 3 at 8–9 (EFG Report).

Load-serving entities have a few options for procuring capacity. First, they can use generating capacity they already own. Second, they can contract with another entity that owns generating capacity to promise to sell energy in the future when called upon by MISO to do so. Third, as a final fallback option they can obtain capacity through a residual capacity market run by MISO known as the Planning Resource Auction ("Planning Auction" or "PRA"). *See id.*

ii. MISO's Residual Capacity Market.

MISO conducts the Planning Auction every year. The Planning Auction is actually four separate simultaneous seasonal auctions. In each auction, MISO solicits operational commitments for each season from a suite of generation resources that will ensure resource adequacy. Many resources provide an "offer" identifying what price they would need to be paid to keep operational (*i.e.*, remain capable of delivering power upon command) all or part of the resource's accredited capacity for each of the four seasons. Other resources, including those already committed to operate via outside contracts, are self-scheduled into the auction process, meaning that MISO treats them as price takers or $0 offers. MISO then stacks each of these resources in ascending cost order, forming a supply curve.

The supply curve crosses a preset sloped demand curve, known as the Reliability Based Demand Curve. The sloped demand curve is designed by MISO to procure a

certain amount of capacity at each price point; although it is tethered around MISO's goal of experiencing no more than one loss of load event per decade, it will obtain more capacity if it is cheaper and less if it is more expensive. This is consistent with the general principle that grid operators must always balance the tradeoff between resource adequacy and cost. *See* Ex. 10 at 2–3 (Grid Strategies June Report); Ex. 3 at 8–9 (EFG Report); Ex. 31 at 4 (MISO 2025–26 Auction Results).

The point where the supply and demand curves intersect is called the capacity market clearing price. All resources on the supply curve with offers at or below that amount are then committed to remain operational and be available for the respective season(s) in which they cleared, with the owners of those resources' capacity rights receiving the clearing price. Ex. 58 (MISO Tariff Module E-1).

iii. MISO's Approvals of Generator Retirements.

Pursuant to MISO's FERC-approved tariff, a utility within MISO seeking to suspend the operation of a generating unit must provide an "Attachment Y" notice to MISO. Ex. 60 at 1 (MISO Tariff Sec. 38.2.7); Ex. 61 (MISO Tariff Attachment Y). The purpose of the notice is to enable MISO to evaluate the potential local grid reliability impacts of such suspension. If retirement would cause unacceptable reliability impacts, MISO may offer compensation to keep the resource active as a System Support Resource. *See* Ex. 60 at PDF p. 5 (MISO Tariff Sec. 38.2.7).

3. MISO Also Continuously Monitors the Grid to Balance Supply and Demand, and to Prevent Blackouts Using an Escalating Sequence of Real-Time Alerts that Activate Reserve Resources in a Specific, Predetermined Order.

In addition to annually securing the set of resources it has determined will meet its regional reliability standard, MISO also operates the grid on a daily and hourly basis to match the resources it has available with load (*i.e.*, demand) over the course of each day. During normal operational periods, MISO uses its energy markets to receive information from every potential resource in the region (generators, batteries, etc.) about how much power they believe they can provide and at what price, and then issues instructions to the set of resources it needs to meet projected demand at least cost to the system. *See generally Elec. Power Supply Ass'n*, 577 U.S. at 268 ("Each administers a portion of the grid, providing generators with access to transmission lines and ensuring that the network conducts electricity reliably. And still more important for present purposes, each operator conducts a competitive auction to set wholesale prices for electricity. These wholesale auctions serve to balance supply and demand on a continuous basis, producing prices for electricity that reflect its value at given locations and times throughout each day." (internal citation omitted)).

On occasion, the total electric generation that is freely offered in MISO's day-ahead market is less than the MISO region's projected demand. That mismatch between projected demand and voluntary supply does not, however, of itself produce any disruption to the grid. In these instances, MISO implements a well-defined process to identify additional resources until the projected shortfall is addressed.

MISO has enshrined its process for securing extra resources to address projected shortfalls, which it deems "Max Gen Emergencies," in its operational tariff. Ex. 33 at §§ 4.2–4.3 (MISO Market Capacity Emergency) (describing Max Gen Emergency Event procedures). As described there, MISO often can address any shortfall simply by issuing a capacity advisory to double check its numbers, followed by a so-called "max-gen" alert to facility operators to suspend any optional maintenance or other activities that might be interfering with resources' power output (*i.e.*, to achieve maximum generation from all available resources). *Id.* at §§ 4.1, 4.2.2. MISO can then issue a warning of a potential shortfall and start curtailing exports and coordinating with its neighbors to bring in imports from adjacent regions. *Id.* at § 4.2.3. If these preliminary measures don't address the shortfall, MISO will then proceed step by step through a series of five steps with subparts (labeled "1a" through "5") of increasingly stringent mitigation measures to increase generation or reduce usage of electricity during the period at issue. Only on the final step (step "5") does any involuntary load shedding (*i.e.*, a blackout) occur; Steps "1a" through "4b" describe an escalating sequence of mitigation measures MISO will employ, including requesting power transfers from neighboring regions, turning on backup generators, utilizing contracted demand response resources, and asking the public for voluntary reductions. *See* Ex. 33 (MISO Market Capacity Emergency); Ex. 3 at 7 (EFG Report). The following table, prepared by MISO and reproduced here as Figure 3, describes these steps (without delineating between "step 1a," "step 1b," etc.).[3]

[3] The following is a partial explanation of acronyms in the table: MPs means Market Participants; LBAs means Load Balancing Authorities; AME means Available Maximum Emergency; EEA means Energy Emergency Alert; LMM means Load Management Measures; LMRs means Load Modifying Resources; EDR means Emergency Demand Response; LMPs means Locational Marginal Prices; MCPs means Market Clearing Prices; and VOLL means Value of Lost Load. Ex. 33 (MISO Market Capacity Emergency) at 2, 3, 8, 13, 19, 34.

***Figure 3**: Market Capacity Emergency Procedure Steps*



Source: Ex. 33 at 43 (MISO Market Capacity Emergency).

Through a combination of responsible grid management and capacity retention policies, MISO has avoided the need to utilize the full five steps of its emergency process in recent years. MISO has not faced a Market Footprint Maximum Generation Emergency Event Step of 3 or higher since 2009, according to the most recent summation available (through June 2024)—and the highest Max Gen event in the recent Summer 2025 season reached only Step 1b. *See* Ex. 32 at 4–27 (MISO Emergency Declarations); Ex. 68 at 3–4 (Grid Strategies Sept. Report). For the Fall 2025 season that recently concluded, PIOs are not aware of any EEA alert having been issued. Moreover, MISO Staff's December 2025 presentation to MISO's Board of Directors indicated that "No reliability actions were needed this fall" and showed on a granular daily level that no alerts, warnings, or reliability actions or events occurred in the Fall 2025 season. Ex. 138 at 11 (MISO Fall 2025 Operations Report).

For the recently concluded Winter 2025–2026 season, MISO avoided the need to utilize any Max Gen event beyond Step 2c, even during Winter Storm Fern in the latter part of January. Even during the storm's most challenging hours, MISO had more than 5,000 MW of surplus generation above the level needed to serve the system load. Ex. 173 at 5 (Konidena April Declaration) (showing surplus generation in table 3); *id* at 4 (describing how the listed values "represent a floor on the potential amount of resources available to MISO."). Winter Storm Fern constitutes

the latest demonstration that MISO's Maximum Generation procedures can secure additional operating capacity when needed to meet load.

4. Indiana Evaluates Resource Adequacy Through Integrated Resource Planning and Annual Capacity Procurement Requirements.

Electric utilities in Indiana are required, pursuant to legislation enacted over a decade ago, to submit to the Indiana Utility Regulatory Commission (the "Indiana Commission") an "integrated resource plan that assesses a variety of demand side management and supply side resources to meet future customer electricity service needs in a cost effective and reliable manner." Ind. Code § 8-1-8.5-3(e)(2). By rule, the Indiana Commission requires utilities—including NIPSCO and CenterPoint Indiana—to submit their IRP for review every three years. 170 IAC 4-7-2(a). Following submission of the IRP, customers and interested parties may submit comments to the Indiana Commission; this is followed by a draft report issued by the Indiana Commission's designated director, another round of stakeholder comment, and then a final report from the Indiana Commission's designated director. The director's report is to comment on the IRP's compliance with requirements for its contents. 170 IAC 4-7-2.2(a)–(g).

And those required contents are extensive. A utility's integrated resource plan must include the following, among other requirements:[4]

(1) At least a twenty-year future period for predicted or forecasted analyses;

(2) An analysis of historical and forecasted levels of peak demand and energy usage, including historical load shapes, actual and weather-normalized energy and demand levels; assumptions as to demographic, economic, and technological changes;

(3) At least three alternative forecasts of peak demand and energy usage;

(4) A description of the utility's existing resources, including expected retirements, deratings, life extensions, repowerings, and refurbishments; fuel price forecasts by generating unit; and analysis of the transmission system's effects on power supply;

[4] The following partial description of requirements is condensed slightly from the language used in Indiana's regulatory code.

(5) A description of the utility's process for selecting possible alternative future resources for meeting future demand, including a cost-benefit analysis, if performed;

(6) A description of the possible alternative future resources for meeting future demand, including demand-side, supply-side, and transmission resources;

(7) . . .

(8) A description of candidate resource portfolios and the process for developing those portfolios, including how the candidate portfolios performed across a wide range of scenarios, and the cost of each portfolio;

(9) A description of the utility's preferred resource portfolio, including a description of how the preferred resource portfolio balances cost effectiveness, reliability, and portfolio risk and uncertainty;

(10) A short-term action plan for the next three-year period to implement the utility's preferred resource portfolio and its workable strategy, including an implementation schedule and budget;

(11) A discussion of inputs, methods, and definitions used in the IRP;

(12) Appendices of data sets and sources used in the IRP;

(13) A description of the utility's effort to develop and maintain a database of electricity consumption patterns, disaggregated by several classes of users;

(14) . . .

(15) A proposed schedule for industrial, commercial, and residential customer surveys;

(16) A discussion of the use of advanced metering infrastructure for enhancing usage data and improving load forecasts, DSM programs, and other aspects of planning;

(17) . . .

(18) A discussion of distributed generation and its effect on planning;

(19) . . .

(20) A discussion of how the utility's fuel inventory and procurement planning practices have been taken into account;

(21) . . .

(22) A description of the generation expansion planning criteria;

(23) A discussion of how compliance costs for existing or reasonably anticipated air, land, or water environmental regulations impacting generation assets have been taken into account;

(24) A discussion of how the utilities balanced resource planning objectives including cost effectiveness, rate impacts, risks, and uncertainty;

(25) A description of the base case scenario;

(26) A description and analysis of alternative scenarios;

(27) A brief description of transmission modeling in the Indiana system;

(29) An explanation of the avoided cost calculation for demand side resources;

(30) A summary of the utility's most recent public advisory process.

170 IAC 4-7-4 to 4-7-9; *see also* Ex. 3 at 1 (EFG Report).

While the Indiana Commission does not directly approve or reject the utility's integrated resource plan (beyond the director's reports described above), any action an Indiana utility takes that impacts its generation mix, including applying for a Certificate of Public Convenience and Necessity for a generating resource, must be consistent with its most recently submitted IRP, unless differences between the most recent IRP and the resource action are fully explained and justified with supporting evidence. Ind. Code § 8-1-8.5-5(b)(2)(B); 170 IAC 4-7-2.5(b). Thus, IRPs are stable and consequential utility planning documents that are given considerable scrutiny by the Indiana Commission.

In addition to submitting IRP analyses, electric utilities located within Indiana's MISO transmission area are required to pass on to the Indiana Commission their annual planning reserve margin report submitted to MISO. Utilities are also required to submit their annual resource adequacy assessment to the Indiana Commission within twenty-five days of submitting the report to MISO. 170 IAC 4-7-2.3(a). Additionally, an electric utility in Indiana is required to demonstrate annually to the Indiana Commission that for both the Summer and Winter seasons, no more than 15% of its allocated capacity requirement will be acquired from the relevant RTO capacity auction. In other words, each utility must demonstrate that it either owns or has under contract 85% of its capacity requirement. Ind. Code § 8-1-8.5-13.

5. NERC Protects Reliability via Standards and Regular Assessments.

NERC is the "Electric Reliability Organization" under Section 215 of the Federal Power Act. *N. Am. Elec. Reliab. Corp.*, 116 FERC ¶ 61,062, at P 3, *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006); *see* 16 U.S.C. § 824o(a)(2). This role dates back to 2005, after Congress added Section 215 to the Act and FERC certified NERC as the Electric Reliability Organization. Energy Policy Act of 2005, Pub. L. No 109-58, Title XII, Subtitle A, section 1211(a), 119 Stat. 594, 941 (2005), 16 U.S.C. § 824o (2000 & Supp. V 2005); 116 FERC ¶ 61,062, at P 16.

As the Electric Reliability Organization, NERC is responsible for establishing and enforcing reliability standards for the bulk power system. 16 U.S.C. § 824o(a)(2); 18 C.F.R. § 39.1. NERC's reliability standards are subject to FERC's review and approval. 16 U.S.C. § 824o(d); Ex. 10 at 7 (Grid Strategies June Report).

The NERC-developed and FERC-approved reliability standards apply to all users, owners, and operators of the bulk power system within the continental United States. 16 U.S.C. § 824o(b)(1); 18 C.F.R. §§ 39.2, 40.1(a), 40.2(a); *see* 18 C.F.R. § 39.1 (defining "Bulk-Power System"). Each reliability standard identifies the types of entities that must comply with the standard, such as generator owners, transmission owners, or transmission operators. *Reliability Standard Compliance and Enforcement in Regions with Regional Transm. Orgs. or Indep. Sys. Ops.*, 122 FERC ¶ 61,247, at P 4 (2008); *e.g.*, Ex. 130 (NERC Emergency Ops., EOP-011-4) (stating requirements applicable to, *inter alia*, balancing authorities, reliability coordinators, and transmission operators for the purpose of "address[ing] the effects of operating Emergencies by ensuring each Transmission Operator and Balancing Authority has developed plan(s) to mitigate operating Emergencies and that those plans are implemented and coordinated within the Reliability Coordinator Area as specified within the requirements"). Independent System Operators like MISO must comply with applicable NERC standards, and they are subject to penalties for noncompliance. 122 FERC ¶ 61,247, at PP 1, 5, 16; *see also* MISO Tariff Schedule 34 (setting forth allocation costs associated with monetary penalties assessed against MISO for violation of NERC standards).

NERC performs other functions in addition to development and enforcement of reliability standards. For instance, NERC annually assesses seasonal and long-term reliability of the bulk power system and monitors system performance. *See* Ex. 10 at 7–8 (Grid Strategies June Report); 18 C.F.R. § 39.11. As part of these assessments, an "elevated risk" designation does not constitute an emergency because it does not indicate the possibility of imminent shortfalls; indeed, it is only the second of three risk levels offered by NERC. NERC typically provides specific context and details associated with its determination. Since it began providing standardized "risk"

assessments by region in the summer of 2021, NERC has adhered to a three-tiered assessment of risk: areas facing the least risk are "low" or "normal" risk regions, areas facing the most risk are "high" risk regions, and areas in between are "elevated" risk regions. *See* Exs. 42A at PDF pp. 74–75, 42B at pp. 35 & 81, 42C at p. 42 (2019–24 NERC Summer Reliability Assessments). The details of the three risk levels are explained further below in Figure 4. NERC's determination of "elevated" risk generally indicates that there is a "[p]otential for insufficient operating reserves in above-normal conditions." Ex. 41 at 6 (NERC 2025 Summer Reliability Assessment). An "elevated risk" does not justify an emergency declaration because it does not indicate the possibility of imminent shortfalls; indeed, it is only the second of three risk levels offered by NERC. Moreover, Planning Reserve Margins *do generally* meet Reference Margin Levels in "elevated" risk regions. *Id.* at 10, 41. NERC typically provides specific context, assumptions, and details associated with a determination to allow an audience to understand its implication. *See id.* at 16.

***Figure 4**: NERC Seasonal Risk Assessment Levels*

Table 2: Seasonal Risk Assessment Summary

Category	Criteria[1]
High Potential for insufficient operating reserves in normal peak conditions	• Planning Reserve Margins do not meet Reference Margin Levels (RML); or • Probabilistic indices exceed benchmarks, e.g., loss of load hours (LOLH) of 2.4 hours over the season; or • Analysis of the risk hour(s) indicates resources will not be sufficient to meet operating reserves under **normal peak-day demand and outage scenarios**[2]
Elevated Potential for insufficient operating reserves in above-normal conditions	• Probabilistic indices are low but not negligible (e.g., LOLH above 0.1 hours over the season); or • Analysis of the risk hour(s) indicates resources will not be sufficient to meet operating reserves under **extreme peak-day demand with normal resource scenarios** (i.e., typical or expected outage and derate scenarios for conditions);[2] or • Analysis of the risk hour(s) indicates resources will not be sufficient to meet operating reserves under **normal peak-day demand with reduced resources** (i.e., extreme outage and derate scenarios)[3]
Normal Sufficient operating reserves expected	• Probabilistic indices are negligible • Analysis of the risk hour(s) indicates resources will be sufficient to meet operating reserves under normal and extreme peak-day demand and outage scenarios[4]

Table Notes:
[1]The table provides general criteria. Other factors may influence a higher or lower risk assessment.
[2]**Normal resource scenarios** include planned and typical forced outages as well as outages and derates that are closely correlated to the extreme peak demand.
[3]**Reduced resource scenarios** include planned and typical forced outages and low-likelihood resource scenarios, such as extreme low-wind scenarios, low-hydro scenarios during drought years, or high thermal outages when such a scenario is warranted.
[4]Even in normal risk assessment areas, extreme demand and extreme outage scenarios that are not closely linked may indicate risk of operating reserve shortfall.

Source: Ex. 143 at 11 (NERC 2025–2026 Winter Reliability Assessment).

B. The Evidence Shows No Reliability or Resource Adequacy Crisis in MISO for Spring 2026, Summer 2026, or Thereafter.

1. There Is No Evidence of a Resource Adequacy Crisis in the current Spring or upcoming Summer Seasons.

MISO conducted its annual four-season capacity auction (the Planning Auction, discussed above in sec. IV.A.2) as scheduled in the spring of 2025. The 2025–2026 Planning Auction procured adequate supplies for MISO as a whole and for Local Resource Zone 6 (which includes the MISO portion of Indiana[5]) for the Spring 2026 season.[6] Notably, the 2025–2026 auction did not include Schahfer or Culley 2 as capacity resources for the Spring 2026 season. Ex. 11 at PDF p. 4 (NIPSCO 2025 Planning Reserve Margin Report); Ex. 12 at 4 (CenterPoint 2025 Planning Reserve Margin Report). For the Spring 2026 period, cleared offers from Zone 6 totaled 15,181.0 megawatts, which exceeded the Zone 6 Local Clearing Requirement by over *46 percent*. The Planning Auction calculated that surplus capacity from other areas of MISO could provide adequate imports—2,985.6 megawatts—towards meeting Zone 6's Reserve Margin Requirement for Spring. Ex. 31 at 21 (MISO 2025–2026 Planning Auction Results); Ex. 3 at 7 (EFG Report).

In addition to Zone 6 fully meeting its capacity requirements, every other Local Resource Zone in MISO successfully met its capacity requirements within the 2025–2026 Planning Auction, resulting in MISO finding that there were no capacity deficits in the region during the planning year. *See* Ex. 31 at 12 (MISO 2025–26 Auction Results) ("The 2025 PRA demonstrated sufficient capacity at the regional, subregional and zonal levels"); Ex. 34 at 9 (Ramey MISO Comments) (testifying just after the 2025–2026 Planning Auction that no capacity deficits for the period beginning in 2025 materialized).

As of the date of this Request for Rehearing, MISO had not yet published the results of its 2026–2027 Planning Auction (covering the year beginning June 1, 2026), which accepted offers last month (March 26 through March 31) and is expected to announce results on April 28, 2026 (that is, next week). Ex. 170 at 5, 6

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[5] MISO Local Resource Zone 6 includes most of Indiana, including the CenterPoint Indiana and NIPSCO service territories, and a portion of Kentucky. *See* Ex. 75 (MISO Tariff Zonal Map).

[6] MISO defines the Spring season for its Planning Auction as March through May, and defines the Summer season as June through August.

(MISO 2026–2027 Planning Auction Timeline). Due to the statutory deadline for this filing, PIOs are not able to describe how the 2026–2027 Planning Auction accounted for resource adequacy in MISO's Summer 2026 season. However, although MISO has not yet divulged those results, MISO is not projecting any possibility of a regional resource adequacy shortfall for Summer 2026. MISO's joint annual survey with the Organization of MISO States ("OMS"), which forecasts generation capacity supply and system load (the "OMS-MISO Survey"), evaluates a range of potential outcomes years into the future, using a set of assumptions ranging from extremely conservative to a match of utility projections. *See supra* sec. IV.A.2. The most recent edition of that survey, completed June 2025, predicts a *surplus* of between 1.4 and 6.1 gigawatts for the Summer 2026 season. Ex. 89 at 2 (2025 OMS-MISO Survey)

As required by Indiana law, both NIPSCO and CenterPoint Indiana completed their triennial IRP analysis within the past sixteen months: NIPSCO in December 2024 and CenterPoint Indiana in December 2025. Exs. 100A–100C (NIPSCO 2024 IRP); Ex. 21 (CenterPoint Indiana 2025 IRP). NIPSCO's 2024 IRP assumed that Schahfer Units 17 and 18 would retire at the end of 2025, with reliability maintained through previously approved transmission upgrades and approximately 2,100 MW of replacement resources (renewables plus a new 400-MW gas peaker) entering service. Ex. 100A at 6–7 (NIPSCO 2024 IRP, part 1); Ex. 3 at 3–4 (EFG Report). NIPSCO's resource planning analysis indicated no sign of a Summer reliability shortfall in 2026, and the retirement of Schahfer would not create a capacity deficiency under the current rules. Ex. 100A at 26 (NIPSCO 2024 IRP, part 1); Ex. 3 at 4–5 (EFG Report). NIPSCO's analysis also showed that for the Summer 2026 season, total accredited capacity is well above the Planning Reserve Margin. Ex. 100A at 26 (NIPSCO 2024 IRP, part 1); Ex. 3 at 5–6 (EFG Report). Thus, the IRP record supports the conclusion that continued operation of Schahfer 17 and 18 is not required for resource adequacy in early 2026. Ex. 3 at 5–6 (EFG Report). NIPSCO also submitted a Planning Reserve Margin Annual Report to the Indiana Commission last year to demonstrate how it meets the 85% threshold for each season of 2025–2026 and 2026–2027 pursuant to Ind. Code § 8-1-8.5-13(*l*), as discussed above in section IV.A.4. Ex. 11 at 3–6 (NIPSCO Planning Reserve Margin 2025 Report).

Similarly, CenterPoint Indiana's most recent IRP, filed late last year, assumes Culley Unit 2 would retire at the end of 2025 as part of its Reference Case. Ex. 21 at 151 (CenterPoint Indiana 2025 IRP). CenterPoint Indiana's analysis and projections show no capacity shortage in Summer 2026 or in subsequent years. *Id.* at 152; Ex. 3 at 3 (EFG Report). Specifically, for the Summer 2026 season, CenterPoint Indiana projected a capacity surplus of 58 MW relative to its Planning Reserve Margin. *Id.* Additionally, CenterPoint Indiana submitted its Planning Reserve Margin Annual

Report to the Indiana Commission in May 2025, again pursuant to Ind. Code § 8-1-8.5-13(*l*). The report showed that CenterPoint Indiana more than meets its minimum 85% requirement of owned or contracted resources, with 99% of the utility's allocated Reserve Margin Requirement for Spring 2026 and 106% for Summer 2026 owned or contracted for. Ex. 12 at 4–5 (CenterPoint 2025 Planning Reserve Margin Report).

2. There Is No Evidence of a Resource Adequacy Crisis After Summer 2026.

The MISO system is also positioned to operate reliably for years beyond the 90-day timeframe of the Orders. There is ample evidence demonstrating that this is true for the remainder of the 2025–2026 planning year; for the next couple years after that; and even out through the 2030 time horizon that the Department identifies as a long-term source of concern.

First and most directly, MISO has secured the stability of its grid through at least the end of May 2026 by operation of its 2025–2026 Planning Auction. The auction secures in April of each year the resources necessary to ensure grid reliability individually for each of the four subsequent seasons. *See supra* sec. IV.A.2.ii. The 2025–2026 Planning Auction exceeded its target Reserve Margin Requirements for the Spring season by 1.5%, meaning that (as it did for the Summer, Fall, and Winter seasons) MISO will enter the Spring season with *more* resources than its own analysis has indicated are actually needed to ensure grid reliability. Ex. 31 at 5 (MISO 2025–26 Auction Results). Furthermore, MISO's modeling in conjunction with its shift to a seasonal resource adequacy construct indicated that the loss of load risk in Spring (as with Fall 2025 and Winter 2025–2026) is very low. Ex. 81 at 49:15–17 (Joundi Testimony); *see also* Ex. 82 at 33 (MISO 2024–25 LOLE Study Report); Ex. 83 at 34 (MISO 2025–26 LOLE Study Report). Thus, there is no basis for any resource adequacy concern for the Spring season.

Second, although MISO has not yet reported the results of its 2026–2027 Planning Auction (or the auctions for subsequent years), MISO is not projecting any possibility of a regional resource adequacy shortfall through May 2027. The 2025 OMS-MISO Survey, discussed in *supra* section IV.A.2, includes projections for Planning Year 2027–2028 ranging from a surplus of 6.4 GWs to a small deficit of 1.4 GWs. Ex. 89 at 7 (2025 OMS-MISO Survey). In other words, the survey provides no basis for any concern about MISO's ability to meet resource adequacy needs through at least May 2027. And a series of unlikely events would have to occur for the region to see even a minor (1–2 GW) deficit through May 2028, as further explained below. MISO's system is robust, and even before its new approach to

generator interconnection (also discussed below), it was on track as of early June 2025 to ensure that its grid remains robust for approximately the next three years.

The evidence also confirms sufficient resources in the months and years after Summer 2026 in the utility territories of both NIPSCO and CenterPoint Indiana, where the subject generating Plants are located. CenterPoint Indiana's Planning Reserve Margin Report submitted to the Indiana Commission last year shows that it has secured accredited resources totaling over 100% of its allocated Reserve Margin Requirement in each season of planning year 2026–2027 and 2027–2028. Ex. 12 at PDF pp. 5–6 (CenterPoint 2025 Planning Reserve Margin Report). And NIPSCO's IRP "indicates no sign of a summer reliability shortfall in . . . 2027 [in addition to 2026]." Ex. 3 at 5 (EFG Report).

To the extent there are capacity gaps shown in the NIPSCO and CenterPoint Indiana IRPs in years 2028 and beyond, such gaps are not *predictions* of the shortage of capacity needed to meet demand. Rather, consistent with the planning purpose of IRPs, both NIPSCO and CenterPoint Indiana's IRPs calculate the amount of accredited capacity needed to meet demand, plus, maintain a Reserve Margin as determined by MISO. Ex. 21 at 81 (CenterPoint Indiana 2025 IRP); Ex. 100A at 24 (NIPSCO 2024 IRP, part 1). Any "surplus" or "shortfall" shows whether the utility has more or fewer resources than are needed to achieve MISO's Reserve Margin given expected future load and utility-owned generation and capacity purchases.

For Summer 2028 and Summer 2029, CenterPoint Indiana shows a capacity shortfall of 115 MW and 114 MW respectively. Ex. 21 at 152 (CenterPoint Indiana 2025 IRP). NIPSCO shows a shortfall starting in Summer 2028. Ex. 100A at 26 (NIPSCO 2024 IRP, part 1). But these projected capacity deficits are not a basis on which to declare an imminent shortfall or an emergency. They are a planning signal to guide medium- and long-term utility planning. And they are being treated as such by CenterPoint Indiana and NIPSCO. CenterPoint Indiana does not have a projected shortfall in 2028 because it is unable to procure or interconnect enough capacity. Rather, the utility has not decided on whether to purchase capacity from the MISO market or construct a battery using Culley 2's interconnection rights and is conducting an RFP to see which would be more cost-effective for its customers. *See* Ex. 21 at 190 (CenterPoint Indiana 2025 IRP); Ex. 3 at 3 (EFG Report). Likewise, NIPSCO's existing capacity projection showing a shortfall starting in 2028 should be understood as a "foundational starting point" upon which "NIPSCO developed six different portfolio concepts around accreditation and emission intensity through least cost portfolio optimization analysis." Ex. 100A at 26 (NIPSCO 2024 IRP, part 1); s*ee also* Ex. 100A at 1 (describing NIPSCO's selected solution of "add[ing] between 900 and 1,150 MW of new storage capacity and 350

MW of short-term thermal PPAs by 2028-2029. . . . NIPSCO will continue to track accreditation trends as the rule is implemented and adjust its storage procurement plan accordingly.") (NIPSCO 2024 IRP). The capacity supply-demand balance graphs in NIPSCO's IRP "are NIPSCO's going-in position to its 2024 IRP (including existing and planned resources) and do not contemplate unidentified, additional resources that NIPSCO would plan to acquire as a result of its IRP to fill gaps in need in 2028 and beyond." Ex. 3 at 5 (EFG Report) (referring to Ex. 100A at 26 (NIPSCO 2024 IRP, part 1)).

Third, although MISO has spoken publicly about its long-term resource adequacy concerns heading into Summer 2028 and beyond, those concerns can be addressed through traditional, non-emergency, policy measures and other strategies to ensure no shortfall actually occurs. And MISO is not standing still in this regard; as MISO has explained,

> "State regulators along with utilities have the responsibility of ensuring resource adequacy. MISO remains focused on reliably operating the grid using the resources our members provide, while working closely with stakeholders and regulatory partners, providing visibility into system needs and sending market signals to inform long-term resource planning."

Ex. 117 at PDF p. 4 (RTO Insider Article).

Generally speaking, from FERC down to stakeholders, everyone working regularly in the energy regulatory world recognizes that the industry is dynamic, and everyone is engaging to ensure there are adequate resources going forward. At the end of May 2025, FERC hosted a technical conference where MISO, the MISO Independent Market Monitor, and other contributors highlighted that the system is in good shape today, and outlined plans to ensure that remains the case down the road. *See, e.g.*, Ex. 35 at 1 (Patton MISO Comments) ("The resource adequacy challenges and risks in MISO are not nearly daunting as portrayed by MISO planning reports or the NERC 2024 Long-Term Reliability Assessment."); *see also* Ex. 62 at 13 (FERC Technical Conference Notice).

In fact, MISO has already taken tangible steps to address what it perceived to be a potential for resource adequacy shortfalls down the road: it developed, and secured FERC approval for, an Expedited Resource Addition Study (ERAS) pathway for generator interconnection. *See generally* Ex. 90 (MISO ERAS Transmittal Letter); Ex. 91 at P 1 (MISO ERAS Decision). The ERAS proceeding demonstrates that in response to somewhat conjectural resource adequacy shortfall projections, MISO launched an entirely new interconnection process that is currently underway. ERAS has already accepted, in its first three cycles, forty

projects totaling around 19,000 megawatts of new capacity, most of which will be provided by gas plants. *See* Ex. 171 (MISO ERAS March Release); Ex. 172 at 1–3 (ERAS Interconnection Requests). *See also* Ex. 48 at PDF p. 2 (Utility Dive, MISO begins reviewing 6.1 GW — 70% of it gas — in fast-track interconnection study). These projects will receive fast-tracked interconnection studies, with projected in-service dates no later than three years from now. Including the forty projects already accepted, projects totaling nearly 27,000 megawatts have been accepted or are pending validation into the ERAS study program. Ex. 171 at PDF p. 2 (MISO ERAS March Release). Of the first twenty-five projects in the program, accepted in September and December of last year, at least ten have already executed interconnection agreements and fifteen more were nearing completion, as of last month. Ex. 171 at PDF p. 2 (MISO ERAS March Release). That approximately 27 GW of nameplate capacity by itself would more than cover the OMS-MISO Survey's maximum projected needs under the most conservative assumptions.[7] The OMS-MISO Survey did not account for ERAS projects because it predated FERC's approval of ERAS. Thus, MISO does not simply have a plan to address the possibility of shortfalls three-plus years down the road; actually, a key pillar of its plan is already underway.

Nor has Winter Storm Fern called into question MISO's resource adequacy—during possible future extreme winter conditions or in any other season. During the tightest operational hour of Fern on January 24, 2026, MISO had access to at least 5,070 MW more generation than was needed to meet MISO's peak load plus operating reserve requirements. Ex. 173 at 5 (Konidena April Declaration); *id.* at 4 (explaining why the calculated numbers represent a "conservative" "floor on the potential amount of resources available to MISO"). Even assuming Schahfer Unit 17, Culley Unit 2, and Campbell were running at their maximum capacities during Fern for a combined total capacity of just under 2,000 MW, MISO still would have had more than 3,000 MW of excess capacity available to it. Ex. 158 at 1 (March Schahfer Order) (noting a Unit 17 nameplate capacity of 423.5 MW); Ex. 159 at 3 (March Culley Order) (noting a Unit 2 nameplate capacity of 103.7 MW); Ex. 165 at 1 (February 2026 Campbell Order) (noting a nameplate capacity of 1,420 MW). The

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[7] While the 27 GW of capacity is nameplate capacity, not accredited capacity, the accredited capacity of the produced resources will almost certainly exceed the 1.4 GW capacity gap identified in the OMS-MISO survey. For combined cycle turbines, accredited capacity is, on average, between 84.7% and 91.4% of the generator's nameplate capacity. *See* Ex. 47 (MISO Schedule 53 Class Averages). Gas generation is 75% by size of the current ERAS queue, including selected and pending applicants. Ex. 172 (ERAS Interconnection Requests).).

Department thus provides no basis for its statements in the Orders that Winter Storm Fern "demonstrated" "MISO's resource adequacy concerns." Ex. 158 at 3 (March Schahfer Order); Ex. 159 at 3 (March Culley Order). *See generally* Ex. 173 at 8 (Konidena April Declaration). And the record does not support that the Plants would have been able to solve any resource adequacy concerns during Winter Storm Fern even if there were not enough capacity. For instance, as CenterPoint Indiana noted, Culley's "performance during the recent MISO cold weather event underscores a pattern of unreliability of [Culley Unit 2]," and Culley was forced offline for at least one day during Fern. Ex. 169 at 2 (CenterPoint Letter to USDOE). Rather, the record shows that MISO did not need the capacity provided by plants subject to 202(c) orders during even the most extreme hours of Fern.

Indeed, while in the throes of Winter Storm Fern, MISO assured FERC on January 26, 2026 that "existing processes have cleared sufficient electric generating capacity across MISO for the periods of time covered by the Order." Ex. 181 at 2 (MISO January Filing). Additionally, while the Department apparently received twenty different requests from utilities and transmission grid operators for Section 202(c) orders during Winter Storm Fern, MISO apparently did not submit any such application, and the Department issued no order during that time period directed to MISO. Ex. 182 (2026 DOE 202(c) Orders Webpage). There is no evidence that pre-existing orders under Section 202(c) were needed to meet MISO's resource need during this Winter Storm Fern time period. And MISO's monthly Operations Report stated that "[r]eliability, markets[,] and operational functions performed as expected in January." Ex. 183 at 2 (MISO January Operations Report).

C. Schahfer and Culley Should Retire As Soon As Possible.

1. Schahfer and Culley Were Built Four to Six Decades Ago.

i. Schahfer Units 17 and 18 Are Electric Generating Units in Indiana Originally Built in the Mid-1980s.

The R.M. Schahfer Generating Station is a coal and gas-burning power plant in Wheatfield, Indiana, owned and operated by NIPSCO, the retail electric utility that serves portions of northwest Indiana. Four coal-burning units were commissioned at the Schahfer site between 1976 and 1986: Units 14, 15, 17, and 18. Coal is delivered to Schahfer by rail. Two smaller gas combustion turbines, Units 16A and 16B, were commissioned in 1979. The Indiana Commission has approved NIPSCO's plan to install new combustion turbine gas units at the site upon the retirement of Units 17 and 18, using the retiring units' interconnection rights. *See* Ex. 20 (IURC Schahfer Gas Plant Order); Ex. 132 (NIPSCO Rate Case Discovery Responses).

NIPSCO is a member of MISO and offers the output of the Schahfer coal units in the MISO energy markets. In its 2018 IRP, NIPSCO determined that retiring and replacing all four Schahfer units would reduce costs for its customers. Ex. 71 at 6-7 (NIPSCO 2018 IRP). The two largest of the four original Schafer units were retired in 2021. Ex. 72A at 9 (NIPSCO 2021 IRP, part 1). The remaining Schahfer coal units, Units 17 and 18, were slated to retire in December 2025. Ex. 102 (MISO Attachment Y Response to NIPSCO).

The Schahfer coal units are no longer competitive in the MISO energy market and have exhibited a long-term decline in generation over the last two decades. *See infra* sec. IV.C.3. Due to their lack of economic competitiveness, NIPSCO has planned and executed a decade-long process to replace these aging coal units with modern generation units.

ii. Culley Unit 2 Is an Electric Generating Unit in Indiana Built in 1966.

The F.B. Culley Generating Station is a coal-burning power plant located in Warrick County, Indiana, near Newburgh. It is owned and operated by CenterPoint Energy Indiana South (formerly Southern Indiana Gas & Electric Company) and sits on the north bank of the Ohio River. CenterPoint Energy Indiana South is the retail electric utility that serves southwest Indiana. Three coal-burning units were built at the Culley facility between 1955 and 1973: Units 1, 2, and 3. Unit 1 has retired.

2. The Owners of Schahfer and Culley 2 Are Investor-Owned Utilities Subject to Extensive Regulation.

i. R.M. Schahfer Generating Station Is Owned by Northern Indiana Public Service Company LLC.

NIPSCO has owned the Schahfer plant since it was built in the 1980s. NIPSCO is a subsidiary of NiSource Inc., a publicly traded corporation based in Indiana with subsidiary utilities in five other states. Ex. 78 at 15, 19, 23 (NiSource 2024 Annual Report). NIPSCO qualifies as a "public utility" under Indiana law, rendering it subject to extensive regulation of its operations by the Indiana Commission: *see, e.g.,* Ind. Code § 8-1-2-1(a), ch. 8-1-2, ch. 8-1-8.5. NIPSCO owns several generating plants in Indiana, including the Michigan City Unit 12 coal generating plant with a capacity of 455 megawatts, the Sugar Creek Generating Station combined-cycle gas plant with a capacity of 563 megawatts, and numerous wind and solar generating facilities around the state of Indiana (plus one solar facility in Kentucky). Ex. 100A at 7 (NIPSCO 2024 IRP, part 1). NIPSCO is also constructing a 400 MW gas combustion turbine facility at the site of Schahfer Units 17 and 18, as discussed below in section IV.C.4.i. NIPSCO is subject to the Indiana Commission's triennial

integrated resource planning requirement and submitted its most-recent IRP to the Indiana Commission in December 2024. 170 IAC 4-7-2(a)(3)(C); Exs. 100A–100C (NIPSCO 2024 IRP).

ii. Culley Unit 2 Is Owned by CenterPoint Energy Indiana South.

The F.B. Culley Generating Station is owned by CenterPoint Energy Indiana South (CenterPoint Indiana), which is a subsidiary of CenterPoint Energy, Inc., a publicly traded corporation based in Houston, Texas with subsidiary electric and gas utilities in four states including Indiana. Ex. 79 at 19-20 (CenterPoint 2024 Annual Report). Like NIPSCO, CenterPoint Indiana qualifies as a "public utility" under Indiana Code § 8-1-2-1, rendering it subject to the state's comprehensive utility regulatory scheme. CenterPoint Indiana owns or controls several generating assets in Indiana, including the two Culley coal units totaling 360 MW; gas turbines totaling 620 MW at A.B. Brown; and hundreds of megawatts worth of owned or contracted wind and solar generating assets. Ex. 80 at 13 (CenterPoint 2025 IRP Summary). Culley Unit 2 is the only CenterPoint Indiana coal unit that lacks post-combustion pollution controls for nitrogen oxides. Ex. 115 at 162-163 (Vectren[8] 2020 IRP). CenterPoint Indiana is also subject to the Indiana Commission's triennial integrated resource planning requirement and submitted its most-recent IRP to the Indiana Commission in December 2025. 170 IAC 4-7-2(a)(3)(C); Ex. 21 (CenterPoint Indiana 2025 IRP).

3. Schahfer and Culley 2 Are Old, Unreliable, Inflexible, Dirty, and Expensive.

i. Schahfer Exemplifies these Unwanted Attributes.

a. <u>Schahfer Is Old and Unreliable</u>.

Schahfer Units 17 and 18 are 43 and 40 years old, respectively, beyond the typical economic design life of 40 years for a coal unit, and approaching the end of the typical operational life of coal units (40 to 50 years). Ex. 4 at 7 (Powers January Decl.) (citing Ex. 63 (Palgrave Handbook) and Ex. 64 (IEA Report)). Both units have experienced long and recurrent outages in recent years that reflect aged, worn components that are expensive and may be difficult to repair or replace. *Id.* at 7–8; Ex. 132 at PDF p. 16 (NIPSCO Rate Case Discovery Responses) ("NIPSCO calculates that operating Schahfer Units 17 and 18 beyond 2025 would require more than $1 billion of additional investment through 2027."). In the tables below, and

[8] CenterPoint Energy Indiana South was formerly known by the trade name Vectren South or Vectren.

with further context in his declaration, PIOs' expert engineer Bill Powers identifies the duration and reasons for the units' longest outages in the past two years based on NIPSCO's filings with the Indiana Commission. Ex. 4 at 7–8 (Powers January Decl.). For reference, there are 8,760 hours in a year.

Longest 2025 Outages by Type

Unit	Outage Description	Total Duration (hours)
17	• Boiler tube leaks (5 outages) • Water level alarm	1,044 74
18	• Boiler tube leak (1 outage) • Steam turbine bearing vibration / failure • High turbine bearing vibration	150 4,205 1,996

The numbers above are rounded to the nearest hour.

Longest 2024 Outages by Type

Unit	Outage Description	Total Duration (hours)
17	• Boiler tube leaks (2 outages)	1,645
18	• ESP problems (1 outage) • Boiler tube leaks (3 outages) • Pulverizer mill trip, extensive damage	147 159 614

The numbers above are rounded to the nearest hour.

Ex. 4 at 6 (Powers January Declaration) (citing NIPSCO public filings including Exs. 14–16 (Saffran Q1, Q2, Q3 2025 Outage Testimony)); Ex. 174 at 7 (Saffran Q4 2025 Outage Testimony).

These outages demonstrate Schahfer's increasing inability to consistently perform even under normal conditions, let alone to meet an emergency. Both units have been unexpectedly unable to produce power during significant portions of recent years. This unexpected downtime is known as a "forced outage" with the "forced outage rate" being the percent of hours in which a unit was in forced outage. The Schahfer units experienced the following forced outage rates over the past two

years, which were well above the national coal unit forced outage average rate of 12.0%.

Unit	Forced Outage Rate	
	2024	2025*
17	18.8%	15.9%
18	13.2%	78.2%

* *through September*

Ex. 4 at 5 (citing NIPSCO public filings including Exs. 14–16 (Saffran Q1, Q2, Q3 2025 Outage Testimony)). Mr. Powers, drawing on his experience of over 40 years in the fields of power plant operations and environmental engineering, opined that these high outage rates "reflect[] the impact of worn and difficult-to-repair or replace coal unit components on operational reliability" and "point to degraded Schahfer 17 and 18 reliability [that] will degrade further if the units are required to run for extended periods of time, are required to stop and start numerous times, or attempt to start up at an accelerated rate in response to extreme demand conditions." Ex. 4 at 1, 6–7 (Powers January Decl.). Mr. Powers noted that the jump in the forced outage rate in 2025 was "likely exacerbated" by underspending on operating and maintenance ("O&M") and capital outlays as the Schahfer units reached their expected end of life. *Id.* at 8. He described how elements of the Schahfer units' air emissions control system—including electrostatic precipitators, the wet limestone scrubber, and ultra-low NO_x burners—need regular maintenance to stave off degradation. *Id.* at 19. He further opined, "It cannot be assumed that the Schahfer 17 and 18 pollution control equipment is in good working order and will operate reliably to control the facility's emissions beyond December 2025." *Id.*

b. Schahfer Is Inflexible.

In addition to its reliability problems outlined above, the Schahfer plant also takes significant time to start up from a cold condition, as shown in the following table:

Unit 17	Unit 18
23 hours	23 hours

Ex. 4 at 10 (Powers January Decl.) (citing Ex. 19, NIPSCO CPCN Discovery Responses). These startup times are very long, even for coal units. *See* Ex. 118 at PDF p. 3 (RMI Analysis of Coal Plants' Threats to Reliability) (stating that the

average coal plant takes 12 hours to reach max capacity from a cold start); Ex. 55 at 26 (IEA Flexibility Report) (similar). Even if Schahfer could provide power reliably—and it cannot—the units' long start times mean the plant is ill-suited to provide peaking power during periods of high demand—precisely the periods the March Schahfer Order appears intended to address. A peak demand event may not become apparent to system operators at MISO until just a few hours before the actual peak. Ex. 4 at 10-11 (Powers January Declaration) (citing Ex. 85 (MISO Attributes Roadmap)). Moreover, bringing the Schahfer units from a cold start condition to full output to meet extreme demand would cost around $300,000 each time. *Id.* at 11 (citing Ex. 54 at 16 (NARUC Coal Report)). The alternative to incurring those costs would be the costly approach of running the units on a "Must Run" or "Self-Scheduled" basis. *Id.*

c. Schahfer Is Dirty.

Schahfer has been a significant source of pollution. Each year when operating, the plant emitted hundreds of thousands of pounds of air toxics, hundreds of thousands of pounds of particulate matter ("PM"), many millions of pounds of nitrogen oxides and sulfur dioxide, and billions of pounds of carbon dioxide. *See* U.S. Envtl. Prot. Agency ("EPA"), ECHO, https://echo.epa.gov/air-pollutant-report?fid=110000493706 (last visited Jan. 6, 2026). In 2023, the plant discharged nearly 29 million pounds of pollution into nearby water bodies, including the Kankakee River, including 23,000 pounds of toxic metals. EPA, ECHO, https://echo.epa.gov/detailed-facility-report?fid=110000493706 (last visited Jan. 6, 2026). PIOs' expert engineer, Mr. Powers, calculated that if Schahfer 17 and 18 operated during the 90-day period of the December Schahfer Order with the same level of production they maintained in January-March 2025, more than 140,000 pounds of SO_2, 675,000 pounds of NO_x, 535,000 tons of CO_2, and 104,000 pounds of PM would be emitted. (As Mr. Powers notes, that analysis ignores that Unit 18 actually needs extensive repairs to become operable, as discussed *infra* in sec. V.B.2.) Ex. 4 at 14-15 (Powers January Decl.).

Emissions from Schahfer have serious health harms. EPA's Co-Benefits Risk Assessment ("COBRA") tool demonstrates that retiring Schahfer would reduce nationwide mortality by 9.4 to 16 deaths per year due to reductions in $PM_{2.5}$, SO_2,

and NO_x emissions. Ex. 154 at PDF p. 5 (EPA COBRA Schahfer Retirement Analysis).[9]

Additionally, burning coal at Schahfer creates toxic coal ash. The plant already holds roughly 1 million cubic yards of coal ash in an on-site impoundment. Ex. 88 at 2 (Schahfer Waste Disposal Area Closure Plan). Groundwater monitoring at Schahfer's Waste Disposal Area has consistently, over several years, shown statistically significant levels (above background concentrations) of lithium, molybdenum, and arsenic at downgradient groundwater monitoring wells. Ex. 147 at 5-7 (Schahfer 2024 Groundwater Monitoring Report). At Schahfer's Restricted Waste Site Type I landfill, the September 2025 groundwater monitoring event also showed statistically significant exceedances above background levels for lithium, molybdenum, and arsenic at downgradient monitoring wells. Ex. 184A at 6 (Schahfer Landfill 2025 Groundwater Monitoring Report, part 1).

d. Schahfer Is Expensive.

Schahfer costs significantly more money to run than it can earn in the market. If Units 17 and 18 run at their average capacity factor from 2020 through 2025 (and ignoring for purposes of analysis the fact that Unit 18 is broken), they are expected to lose $9.8 million and $8.9 million, respectively, during the 90-day term of the Order. Ex. 5 at 6 (Synapse Report).[10]

Schahfer has gotten even more expensive to run since 2021. In 2024, the cost of Schahfer's power rose to $80.93 per MWh, a 66% increase over the 2021 cost. Ex. 49 at PDF p. 2 (2025 Energy Innovation Dataset). This means the cost of Schahfer's power grew significantly faster than inflation (roughly 16%) over the same period. Ex. 50 at 3 (2025 Energy Innovation Coal Cost Report); *see also* Ex. 51 at 12-13 (2023 Energy Innovation Coal Cost Report) (describing the same methodology used in the 2025 report).

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[9] PIOs obtained this analysis in the public COBRA portal by entering the annual Schahfer emissions of $PM_{2.5}$, SO_x, and NO_x, based on data from EPA's CAMPD database, as reductions from the Jasper County and Porter County (Indiana) "Fuel Combustion: Industrial" source.

[10] The Synapse Report calculated revenues and costs on an annualized basis and then calculated three months' worth. *See* Exhibit 5 at *passim*.

ii. Culley Unit 2 Exemplifies These Unwanted Attributes.

a. Culley 2 Is Old and Unreliable.

Culley 2, at sixty years old, is at least ten years beyond the typical operational life of coal units. Ex. 4 at 9 (Powers January Declaration). CenterPoint Indiana has stated that Culley 2 has "run past its useful life" as the basis for its planned retirement in 2025. Ex. 80 at 30 (CenterPoint Indiana 2025 IRP Summary). In the table below, and with further context in his declaration, PIOs' expert engineer Bill Powers identifies how Culley 2's forced outage rate has steadily increased over the past half-decade, based on CenterPoint Indiana's filings with the Indiana Commission.

Culley 2 Forced Outage Rate, 2020-2024

Unit	2020	2021	2022	2023	2024
Culley 2	6.3%	21.9%	26.6%	24.8%	32.4%

Ex. 4 at 8 (Powers January Decl.) (citing Ex. 22, CenterPoint 2024 Performance Report). Mr. Powers states that this data "points to degraded Culley 2 reliability." Ex. 4 at 8–9 (Powers January Decl.). Mr. Powers further highlighted CenterPoint's public disclosure that its maintenance expenditure declined about 20% from 2022 to 2023 in account 512 (Maintenance of Boiler Plant). *Id.* at 9 (citing Ex. 152, CenterPoint Rate Case Discovery Responses). Mr. Powers noted that increased maintenance spending (missing recently at Culley 2) "is necessary to minimize the effect of equipment degradation with age and changing operating regimes." *Id.* at 9.

b. Culley 2 Is Inflexible.

To gauge the startup time of Culley 2, it is instructive to consider the startup time for another coal generating plant formerly within CenterPoint Indiana's portfolio. The A.B. Brown coal units required 18 to 24 hours for a cold start. Ex. 153 at 30 (Wayne Games 2018 Testimony). And Culley 2 is over a decade older than the two A.B. Brown units. *Id.* at 13. As noted above in section IV.C.3.i.b, the startup time of an average coal unit is 12 hours. A cold start time in this range renders Culley 2 unhelpful for responding in real time to emergency conditions. PIOs' expert Mr. Powers opined that like Schahfer, "Culley 2 would not be able to meet a previously unanticipated exceptional MISO peak demand unless it was already online." Ex. 4 at 12 (Powers January Decl.). A cold start of Culley 2 would also cost approximately $37,000 each time; and the cost of running Culley 2 on "Must Run" or "Self Scheduled" commitment status to avoid cold starts solely to be prepared for a potential demand peak would be higher. *Id.* at 12.

c. Culley 2 Is Dirty.

Culley 2 has been a significant source of pollution. Each year when operating, the plant emitted tens of thousands of pounds of air toxics, hundreds of thousands of pounds of particulate matter, millions of pounds of nitrogen oxides and sulfur dioxide, and billions of pounds of carbon dioxide. *See* EPA, ECHO, https://echo.epa.gov/air-pollutant-report?fid=110000403723 (last visited Jan. 11, 2026). In 2023, the plant discharged approximately 92.5 million pounds of pollution into the Ohio River, including nearly 2,000 pounds of toxic metals. EPA, ECHO, https://echo.epa.gov/detailed-facility-report?fid=110000403723 (last visited Jan. 11, 2026). In 2024, under the National Emissions Standards for Hazardous Air Pollutants, EPA initiated an administrative penalty action against CenterPoint Indiana for alleged exceedance of Culley 2's 30-boiler-operating-day rolling average emissions limit for mercury. Allegedly, the exceedance began when Unit 3 experienced a catastrophic boiler feed pump turbine failure in June 2022 and remained out of service through mid-March 2023. CenterPoint Indiana agreed to a Consent Agreement and Final Order involving payment of an $81,500 civil penalty. EPA, ECHO, Civil Enforcement Case Report (Docket No. CAA-05-2024-0031), https://echo.epa.gov/enforcement-case-report?activity_id=3603947405.

PIOs' expert engineer, Mr. Powers, calculated three months ago that if Culley 2 operated during the 90-day period of the December Culley Order with the same level of production it maintained in January–March 2025, more than 113,000 pounds of SO_2, 160,000 pounds of NO_x, 60,000 tons of CO_2, and 153,000 pounds of PM would be emitted. Ex. 4 at 16–17 (Powers January Decl.). The COBRA tool demonstrates that retiring Culley 2 would reduce nationwide mortality by 2.5 to 3.9 deaths per year due to reductions in $PM_{2.5}$, SO_2, and NO_x emissions. Ex. 155 at PDF p. 5 (EPA COBRA Culley Retirement Analysis).[11]

Additionally, burning coal at Culley 2 creates toxic coal ash. The plant already holds roughly 350,000 cubic yards of coal ash in the on-site East Ash Pond, which receives bottom ash sluice water and FGD wastewater from Unit 2. Ex. 98 at 2-2 (Culley East Ash Pond Closure Plan); Ex. 109 at 4-1–4-2 (Culley East Ash Pond Extension Demonstration). Groundwater monitoring data around Culley's East Ash

[11] PIOs obtained this analysis in the public COBRA portal by entering the annual Culley 2 emissions of $PM_{2.5}$, SO_x, and NO_x, based on data from EPA's CAMPD database, as reductions from the Warrick County (Indiana) Fuel Combustion: Electric Utility source. Ex. 155 at 4 (Culley COBRA Analysis).

Pond show that releases of the toxic pollutant molybdenum exceed federally set safety levels. Ex. 148 at 2, 4, 7 (Culley 2024 Groundwater Monitoring Report).

d. Culley 2 Is Expensive.

Culley 2 costs significantly more money to run than it can earn in the market. CenterPoint Indiana Vice President of Power Supply Wayne Games testified in 2018 that "[s]ince 2008, the [A.B.] Brown plants and Culley Unit 2 cycle more than any other Vectren South [CenterPoint Indiana] plant because they are not competitive in the MISO energy market." Ex. 153 at 14 (Wayne Games 2018 Testimony). He referred to Culley 2 (together with the A.B. Brown coal plant) as "among the most inefficient units within the State" and "the smallest and more expensive coal units in the MISO stack." *Id.* at 7, 8.

Moreover, if the unit runs at its average capacity factor from 2020 through 2025, the unit is expected to cost $1.8 million during the 90-day term of the December Culley Order. Ex. 5 at 6 (Synapse Report). Looking beyond the near term of the December Culley Order, Culley 2 would need extensive capital upgrades to run over a longer period. As CenterPoint Indiana's executive, Mr. Games, stated in 2018 as the company first explained its retirement plan for Culley 2:

> "[A] minimum of $70 million in additional capital investments are required to continue operating Culley Unit 2 through 2036. In part, this investment is driven because Culley Unit cannot solely rely on Culley Unit 3 for environmental compliance costs. A dry bottom ash system must be installed to comply with CCR and further investments may be required to comply with section 316b of the Clean Water Act (designed to protect fish and other aquatic wildlife at water intake and outfall structures) on the design and operation of the current river intake structure. In addition to these environmental costs, Culley Unit 2's distributed control system ('DCS') is a Honeywell system 1 installed in 2000 and must be updated or replaced because it is obsolete. A few other significant capital investments that would be required to keep Culley Unit 2 operating beyond 2023 include a turbine major overhaul, boiler acid clean, main transformer overhaul/replacement, major boiler component replacement, dry stack ductwork replacement, ID fan discharge ductwork, coal conveyor gallery replacement, boiler/high energy piping condition assessment, air heater basket replacement, continued overhaul of circulating water pumps and traveling water screens, and replacement of two 480-volt motor control center electrical switchgear."

Ex. 153 at 20-21 (Wayne Games 2018 Testimony). The referenced ash handling system was later approved for construction in 2022, with a capital cost equaling a portion of $19 million. Ex. 125 at 12 (IURC AB Brown CT Order). Additional information on required upgrades for continued operation of Culley 2, costing at least $16 to $20 million, is described *infra* at sec. IV.C.5.iii.

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All of these harms could be avoided by retiring Culley 2 and Schahfer 17 and 18 as planned. As further discussed below, CenterPoint Indiana South and NIPSCO wanted to retire these Plants at the end of 2025. MISO approved the retirements, and the Indiana Commission approved utility actions contemplating both Schahfer and Culley 2 retirements.

4. Schahfer's Retirement Has Been Carefully Planned and Well Executed to Ensure Resource Adequacy.

NIPSCO has been diligently planning the retirement of Schahfer's coal units since at least 2018. In Indiana, IRPs are rigorous processes that involve sophisticated modeling and scrutiny by diverse stakeholders and regulators. *See* section IV.A.4, above. In its 2018 IRP, NIPSCO announced a preferred resource plan that included the retirement of all four Schahfer coal units by 2023. NIPSCO's short term action plan from the 2018 IRP focused on initiating the retirement process for all four of the Schahfer coal units and acquiring replacement resources to fill the energy and capacity gap resulting from the retirements. NIPSCO's 2018 IRP determined that the retirement of Schahfer coal units provided "significant cost savings versus the status quo and offer[ed] an acceptable outcome for portfolio flexibility and with regard to the impact on employees and the local economy." Ex. 71 at 156 (NIPSCO 2018 IRP).

In its 2021 IRP, published in November of that year, NIPSCO noted that Schahfer Units 14 and 15—the larger coal generating units at the site—had been retired earlier that year, and NIPSCO stated that "Units 17 and 18 are on track to retire by the end of 2023." Ex. 72A at 9 (NIPSCO 2021 IRP, part 1). NIPSCO again confirmed that retiring these coal units was economically advantageous. In the 2021 IRP, NIPSCO noted that it continued to make progress on over a dozen Indiana Commission-approved generation projects to replace the retired capacity at Schahfer. Ex. 72A at 9 (NIPSCO 2021 IRP, part 1).

In May 2022, NIPSCO announced plans to delay the retirement of Schahfer Units 17 and 18 until 2025 after several solar projects faced delays associated with a United States Department of Commerce anti-dumping investigation. Ex. 73 (NIPSCO May 2022 Investor Call).

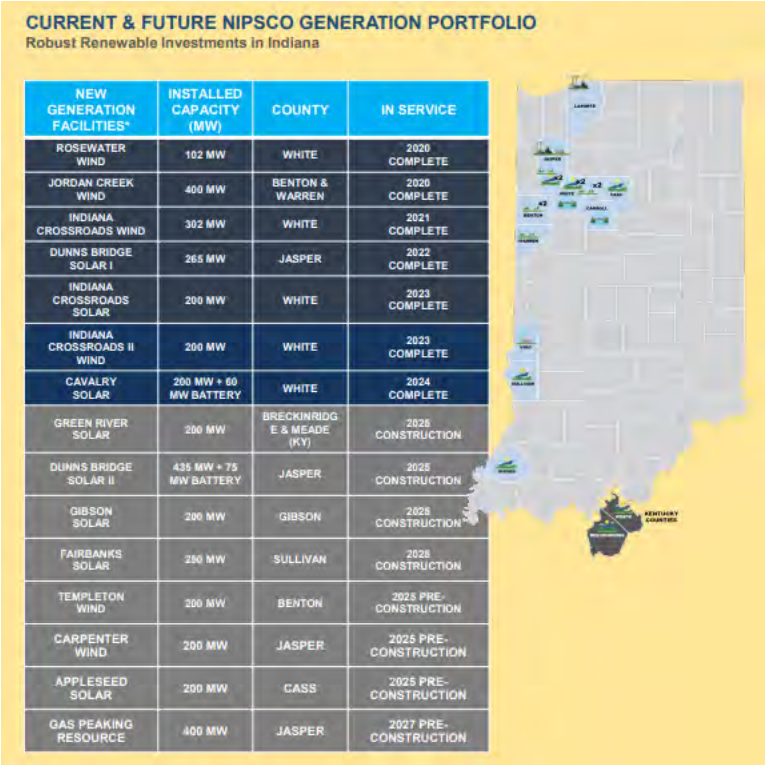
NIPSCO's 2024 IRP confirmed that Schahfer Units 17 and 18 "remain on track to retire by the end of 2025." Ex. 100A at 6 (NIPSCO 2024 IRP, part 1). To replace the retiring capacity at Schahfer, NIPSCO noted that it continued to make progress on its fourteen Indiana Commission-approved renewable energy projects, including wind, solar, and solar plus battery storage resources, while also gaining regulatory approval for a natural gas peaking resource that will be located at the Schahfer property and use the interconnection rights associated with the retiring Units 17 and 18. Ex. 100A at 1, 6–7 (NIPSCO 2024 IRP, part 1); Ex. 20 at 10, 17, 41 (IURC Schahfer Gas Plant Order); Ex. 132 at PDF pp. 14–16 (NIPSCO Rate Case Discovery Responses).

In sum, the retirement of Schahfer Units 17 and 18 results from nearly a decade of planning. In each of these successive resource planning exercises, NIPSCO confirmed that its customers would benefit from the retirement of Schahfer coal units.

i. Schahfer's Retirement Was the Product of a Generation Replacement Strategy that Improves Resource Adequacy.

Over the last decade, NIPSCO has brought forward and the Indiana Commission has approved a suite of generation resources that replace the output of the Schahfer coal units. As NIPSCO is moving from reliance on large single-station generation to a fleet of modern, smaller, more nimble generating units, the replacement of Schahfer is expected to improve reliability and grid resilience. *See* Ex. 132 (NIPSCO Rate Case Discovery Responses).

***Figure 5**: excerpt from Ex. 100A at Summary p. 7 (NIPSCO 2024 IRP, part 1).*



CURRENT & FUTURE NIPSCO GENERATION PORTFOLIO
Robust Renewable Investments in Indiana

NEW GENERATION FACILITIES*	INSTALLED CAPACITY (MW)	COUNTY	IN SERVICE
ROSEWATER WIND	102 MW	WHITE	2020 COMPLETE
JORDAN CREEK WIND	400 MW	BENTON & WARREN	2020 COMPLETE
INDIANA CROSSROADS WIND	302 MW	WHITE	2021 COMPLETE
DUNNS BRIDGE SOLAR I	265 MW	JASPER	2022 COMPLETE
INDIANA CROSSROADS SOLAR	200 MW	WHITE	2023 COMPLETE
INDIANA CROSSROADS II WIND	200 MW	WHITE	2023 COMPLETE
CAVALRY SOLAR	200 MW + 60 MW BATTERY	WHITE	2024 COMPLETE
GREEN RIVER SOLAR	200 MW	BRECKINRIDGE & MEADE (KY)	2025 CONSTRUCTION
DUNNS BRIDGE SOLAR II	435 MW + 75 MW BATTERY	JASPER	2025 CONSTRUCTION
GIBSON SOLAR	200 MW	GIBSON	2026 CONSTRUCTION
FAIRBANKS SOLAR	250 MW	SULLIVAN	2026 CONSTRUCTION
TEMPLETON WIND	200 MW	BENTON	2025 PRE-CONSTRUCTION
CARPENTER WIND	200 MW	JASPER	2025 PRE-CONSTRUCTION
APPLESEED SOLAR	200 MW	CASS	2025 PRE-CONSTRUCTION
GAS PEAKING RESOURCE	400 MW	JASPER	2027 PRE-CONSTRUCTION

In Cause No. 45947, the Indiana Commission approved ~400 MW of gas peaking capacity to be located at the Schahfer site. Ex. 20 (IURC Schahfer Gas Plant Order). NIPSCO relied on its planned retirement of Schahfer to demonstrate that the gas plant was displacing coal and eligible for construction-work-in-progress financing incentives under Indiana law. *Id.* at 21 ("Partial displacement of retiring coal-fired energy generation with a gas peaking resource has been a component of NIPSCO's IRP modeling and related CPCN regulatory filings since 2021. As such, we find the CT Project is being constructed to displace energy from an existing coal-fired generation facility and is therefore eligible for [construction-work-in-progress financing]."). The IDEM-issued air permit for these new peaking units provides that NIPSCO must retire Schahfer Units 17 and 18 before the combustion turbines begin to operate. Ex. 101 at 34 (Schahfer Title V Permit Modification) ("Upon the commencement of operation of the natural gas-fired simple cycle combustion turbines, identified as 19A, 19B, 19C, and Unit 20, the two (2) dry bottom pulverized coal-fired boilers, identified as Unit 17 and Unit 18, shall be permanently shutdown and subsequently decommissioned from the source."). Moreover, as noted above in this section IV.C.4, the new gas peaking capacity relies on using the retiring coal-fired units' existing transmission system interconnection rights.

Collectively, these projects improve reliability. These projects will allow NIPSCO to continue to meet its resource adequacy requirements. *See* section IV.A.4. The battery and peaking gas units are capable of responding to disturbance on the grid and to changing generation needs much more quickly than the coal units. Ex. 132 (NIPSCO Rate Case Discovery Responses).

ii. MISO and the Indiana Commission Continue to Take Actions in Reliance on Schahfer's Retirement.

For MISO asset owners like NIPSCO, no generating unit is permitted to retire without first being approved by MISO for retirement through a process that assures transmission system stability and resource adequacy. In January 2023, NIPSCO requested that MISO approve a retirement date of December 31, 2025, for Schahfer Units 17 and 18. In February 2023, MISO approved the retirement of Schahfer Units 17 and 18, finding no impact on reliability:

> "After being reviewed for power system reliability impacts as provided for under Section 38.2.7 of MISO's Open Access Transmission, Energy, and Operating Reserve Markets Tariff ('Tariff'), the suspension of Schahfer Units 17 and 18 would not result in violations of applicable reliability criteria. Therefore, Schahfer Units 17 and 18 may suspend without the need for the generators to be designated as System Support Resource ('SSR') units as defined in the Tariff."

Ex. 102 at PDF p. 12 (MISO Attachment Y Response to NIPSCO).

The Indiana Commission has also endorsed the retirement of Schahfer Units 17 and 18 in two distinct regulatory processes.

First, in 2019, 2023, and 2025 electric rate case final orders, the Indiana Commission approved depreciation rates and operations and maintenance spending for Schahfer that assumed NIPSCO's expected retirement dates. *See* Ex. 103 at 120 (NIPSCO 2019 Rate Order) (summarizing approved depreciation adjustment and noting NIPSCO's associated plan to retire Schahfer coal units); Ex. 104 at 13-14 (NIPSCO 2023 Rate Order) (approving demolition costs for Schahfer and adjusting depreciation recovery for Schahfer units); Ex. 106 at 23 (NIPSCO 2025 Rate Order) (describing approved settlement's reduction of O&M spending in revenue requirement for Schahfer Units 17 and 18 with their expected retirement in December 2025). While depreciation timelines and adjustments to O&M spending included in base rates do not legally require that a retirement occur on the projected retirement date, in each of these cases a broad coalition of stakeholders, including the Indiana Office of Utility Consumer Counselor (the statutory ratepayer representative), entered into a settlement agreement with NIPSCO that assumed

the units would retire as projected by the utility, and agreed to adjust depreciation schedules and O&M spending accordingly. In each of these cases, the Indiana Commission approved the Schahfer depreciation schedule or O&M spending, while noting the utility's intention to retire the units.

Second, the Indiana Commission approved Certificates of Public Convenience and Necessity ("CPCNs") that NIPSCO received for new generation resources from 2018 through 2025, that were justified, in part, on a stated need to replace the Schahfer coal units. In approving these projects, the Indiana Commission explicitly noted that the generation was intended to replace Schahfer. The Indiana Commission order approving the 400 MW of gas peaking capacity for the Schahfer site, for example, found that "[Combustion Turbine] Project is designed to reliably cycle in response to the MISO market and will displace the retiring Schahfer coal units with more efficient and controllable load-following capacity." Ex. 20 at 28 (IURC Schahfer Gas Plant Order). Other CPCN orders approving NIPSCO's replacement generation include Indiana Commission Cause Nos. 45818, 45936, 45500, 46028, 45908, and 45887. In other words, the Commission has relied on and not objected to the plan for Schahfer retirements as it has approved NIPSCO's requests to build and charge customers for the cost of projects explicitly designed to replace the Schahfer units.

5. Culley 2's Retirement Has Been Carefully Planned and Well Executed, and Overseen by the Indiana Commission to Ensure Resource Adequacy.

CenterPoint Indiana has been planning the retirement of Culley 2—its "oldest, smallest (83 MW), and most inefficient coal generating unit"—for over a decade. Ex. 107 at 33 (Vectren 2014 IRP). In its 2014 IRP, CenterPoint Indiana found that retiring Culley 2 in 2020 would save customers money, but deferred making a decision due to load-growth and regulatory uncertainty. *Id.* at 25-26. The 2016 IRP confirmed that retiring Culley 2 in 2024 was part of the preferred plan for serving its customers. Ex. 108 at 44 (Vectren 2016 IRP). CenterPoint Indiana official Wayne Games informed the Indiana Commission two years later that:

> "Investing so heavily in a unit as old and inefficient as Culley Unit 2 is not economic. Vectren South's modeling bore this out. Due to the higher cost to operate, the unit has experienced less overall run time and much more unit cycling. Culley Unit 2 has reached the end of its useful life and should be retired rather than continuing to spend capital keeping the inefficient unit operating."

Ex. 153 at 21 (Wayne Games 2018 Testimony).

i. Culley 2's Retirement Was the Product of a Generation Replacement Strategy that Improves Resource Adequacy.

CenterPoint Indiana's initial plan to replace Culley 2 and the A.B. Brown coal plant with a combined-cycle gas facility at the A.B. Brown site was rejected by the Indiana Commission in 2019. *See* Ex. 114 (IURC 2019 CCGT Order). The Indiana Commission rejected this replacement gas facility because it found that the utility had failed to adequately consider alternatives, including the ability of renewables to replace some of the retiring coal energy and capacity. *Id*. at 25–28. The Indiana Commission directed CenterPoint Indiana to reevaluate its plan to replace its retiring coal units.

In its 2020 IRP, CenterPoint Indiana announced its revised coal-replacement preferred plan, responding to the Indiana Commission's order in Cause No. 45052. Instead of replacement with a single combined cycle gas facility, the revised plan called for replacement of the majority of CenterPoint Indiana's coal fleet—including A.B. Brown and Culley 2—by the end of 2023 with 700-1,000 MWs of solar, 300 MWs of wind, energy efficiency, and two gas combustion turbines ("CTs") totaling 460 MW. Ex. 115 at 51 (Vectren 2020 IRP). CenterPoint Indiana found that the fast-ramping CTs, combined with the wind and solar resources, enabled the utility "to maintain constant electric supply during potentially extended periods of low output" from renewables. *Id.* at 34–35. CenterPoint Indiana found that the 2020 preferred plan would save its customers $320 million over the study period compared to continued operation of its existing coal generation. *Id.* at 35.

In its 2023 IRP, CenterPoint Indiana observed that the Indiana Commission's approval of five generation projects from its 2020 preferred plan "affirms the direction taken" in replacing its coal units. Ex. 116 at 36 (CenterPoint 2023 IRP). The 2023 IRP modeling again found that a preferred portfolio that included the retirement of Culley 2 in 2025 would save its customers money. *Id.* at 38, 56; *see also id*. at 57 (preferred portfolio "[s]aves customers nearly $80 million over the next 20 years when compared to continued operation of F.B. Culley with coal."). CenterPoint's 2025 IRP again found that retiring Culley 2 in 2025 was a part of the utility's preferred plan. Ex. 80 at 20 (CenterPoint Indiana 2025 IRP Summary).

ii. MISO Likely Approved Culley 2's Retirement, and the Indiana Commission has Approved Adjustments to the Culley Depreciation Schedule and Repeatedly Approved Generation Projects Specifically Designed to Allow Culley 2 to Retire.

CenterPoint Indiana submitted an Attachment Y notice to MISO, as required under MISO's FERC-approved tariff, seeking approval to retire Culley 2 at the end of 2025. Ex. 21 at 52 (CenterPoint Indiana 2025 IRP). While the MISO response to

this Attachment Y filing has not been made public, CenterPoint noted that Culley 2 had operated "past its useful life" and remained on track for a 2025 retirement. *Id.* at 30. CenterPoint noted in a recent filing at FERC that "MISO reviewed the Company's suspension request for Culley Unit 2 and found no reliability criteria violations." Ex. 128 at 9 (CenterPoint Cost Allocation Complaint).

The Indiana Commission has supervised CenterPoint's resource planning and endorsed the retirement of Culley 2 in two categories of regulatory proceedings. Since 2020, the Indiana Commission has approved a series of generating resources that were explicitly premised on replacing Culley 2 and other now-retired coal units. For example, in Cause No. 45564, in approving the construction of 460 MW of gas peaking capacity, the Indiana Commission observed that the "Preferred Portfolio identified through the 2019/2020 IRP called for the retirement or exit of energy provided by coal-burning units at the Brown and Culley generating stations." Ex. 125 at 16 (IURC AB Brown CT Order). The Indiana Commission further observed of this replacement plan:

> "The Preferred Portfolio mapped a shift from a generating fleet of predominantly coal-burning resources to one of intermittent renewable resources supported by gas generation to ensure reliability. One early step in implementing the Preferred Portfolio was the addition of solar generating resources approved by the Commission in Cause Nos. 45501 on October 27, 2021 and 45600 on May 4, 2022. A next step is the addition of the two new CTs requested in this Cause."

Id. at 16. Thus, in approving CPCNs for replacement resources, the "steps" in CenterPoint Indiana's replacement plan, the Indiana Commission approved CenterPoint Indiana's plan to retire and replace Culley 2.

Second, in Cause No. 45990, a CenterPoint Indiana electric rate case, the Indiana Commission approved an adjustment in test-year spending associated with the retirement of Culley 2. Ex. 126 at 58 (IURC 2025 CenterPoint Rate Order); *see also* Ex. 127 at 30 (Chrissy Behme Testimony) (rate schedules filing "reflects a pro forma adjustment decrease to test year expense associated with F.B. Culley Unit 2, which is forecasted to retire at the end of the test year."). In other words, the Indiana Commission has already approved a reduction in rate recovery associated with the Culley 2 retirement.

iii. CenterPoint Indiana Asked the Department to Not Renew the December Culley Order.

In February of this year, CenterPoint Indiana furnished a letter to the Department, noting that "maintaining F.B. Culley Unit 2 [] will require substantial

investment to support an inefficient and increasingly unreliable asset, rather than advancing affordable and reliable service for customers in southwestern Indiana." Ex. 169 at 1 (CenterPoint Letter to USDOE). CenterPoint specifically asked the Department to "allow [the December Culley Order] to expire on March 23, 2026, and abstain from issuing subsequent Section 202(c) directives for Unit 2." *Id.* CenterPoint indicated that it "ha[s] adequate generation capacity – without Unit 2 – to meet MISO's Planning Reserve Margin Requirement through the 2027–2028 Planning Year[.]" *Id.* For the 48 days from the date of the December Culley Order through February 8, 2026, Unit 2 was on outage due to equipment issues for 26 days; available but not economically dispatched on five days; and on 17 other days, running but limited to between 45 MW and 78 MW (net) due to maintenance issues. *Id.* at 2.

What's more, as CenterPoint stated, reviving Culley 2 to a shipshape condition would be extremely lengthy and expensive. "Safe and reliable operation beyond March 2026 hinges on major and costly interventions, including acid cleaning of the boiler and replacement of boiler tubes—necessitating a four-week or longer outage, with projected cost of approximately $1.9 million – $2.5 million." *Id.* at 2. CenterPoint also indicated that Culley needs an "unavoidable" turbine overhaul (as current operation is significantly increasing the risk of catastrophic mechanical failure"), which would entail a 10-week outage and total expenditures of at least $14 million – $18 million, if not more. *Id.* at 2. CenterPoint stated that "extending the life of Unit 2 is neither practical nor financially responsible." *Id.* at 2.

V. REQUEST FOR REHEARING

The Orders are a manifestation of the Department's overarching policy to systematically misapply Section 202(c) of the Federal Power Act to preserve fossil-fueled power plants, including coal-fired plants, that otherwise would be retired. That policy aims to bolster the fossil energy industry, irrespective of need, expense, and harm. In its zeal to implement its policy through issuance of the Orders, (1) the Department has exceeded the authority Congress gave it, using its "emergency" powers in the absence of any imminent shortfall to impose federal control over basic generation and supply decisions; and (2) the Department has done so without reasoned decision-making and on the basis of purported "facts" that are not supported by credible evidence. *See Michigan v. EPA*, 268 F.3d 1075, 1081 (D.C. Cir. 2001) (explaining that, absent statutory authorization, an agency's action is contrary to law); *Allentown Mack Sales & Serv., Inc. v. Nat'l Labor Rel. Bd.*, 522 U.S. 359, 374 (1998) (explaining agency obligation to undertake reasoned-decision-making); *Motor Vehicle Mfrs. Assn. of United States, Inc. v. State Farm Mut. Automobile Ins. Co.,* 463 U.S. 29, 43 (1983) (same); *Burlington Truck Lines, Inc. v.*

United States, 371 U.S. 156, 168 (1962) ("The agency must make findings that support its decision, and those findings must be supported by substantial evidence."); *Butte Cnty. v. Hogen*, 613 F.3d 190, 194 (D.C. Cir. 2010) ("[A]n agency cannot ignore evidence contradicting its position."). Numerous examples of the Department's unreasoned and unlawful decision-making are described throughout this section V. The only plausible explanation for these repeated legal errors is that the Department has prioritized implementing its policy over compliance with law.

Congress never conferred on the Department the broad authority over the country's mix of power generation resources that the Department seeks to wield under the pretense of responding to claimed "emergencies." To the contrary, Congress explicitly reserved authority over resource adequacy and grid reliability to the states, FERC, and NERC. *See, e.g.*, 16 U.S.C. §§ 824(a)–(b), 824o; *Pac. Gas & Elec.*, 461 U. S. at 205. Both the agency's new policy and the Orders exceed the Department's authority and are therefore contrary to law.

Before tackling the Orders' legal faults and issues, *see infra* sections V.A through V.D, it is useful to understand the broader context of the Department's policy. The Department acknowledges that its Orders are based on a government-wide policy—dictated by Executive Order—of promoting fossil-based energy through the use of any emergency powers executive departments and agencies could try to invoke. The Orders rely upon the Energy Emergency EO, 90 Fed. Reg. 8433, which directs the heads of all executive departments and agencies to use "emergency authorities" and "other lawful authorities" to facilitate the production, extraction, creation, and generation of coal and other fossil fuels.

The Orders also rely on another executive order, the Grid EO (Ex. 93). The Grid EO was issued at the same time as three other executive actions aimed at giving a lifeline to the coal industry, and was announced at a White House political event focused on promoting coal. Ex. 94 (NY Times Coal Article). In essence, the Grid EO calls on the Department to assume the authority for resource adequacy and grid reliability decision-making that the Federal Power Act reserves to others, and to "systemize" the issuance of Section 202(c) orders for that improper purpose. *See* Ex. 93, 90 Fed. Reg. at 15521–22 (Grid EO) (directing the Department to "streamline, systemize and expedite" the issuance of Section 202(c) orders; to develop a "uniform methodology" for assessing reserve margins and a protocol to retain generators the Secretary deems critical to system reliability; and to prevent certain generators from leaving the bulk-power system or converting to a different fuel source).

The Department's words and actions following issuance of the Grid EO reveal its efforts to unlawfully arrogate to itself others' lawful authority through systematic

misapplication of Section 202(c) to prop up coal-burning power plants. The Department's initial steps included issuing a Section 202(c) order to prevent the well-planned retirement of the J.H. Campbell Generating Plant in Michigan. *See* Ex. 150 (May Campbell Order). The Department's order was clear on one point—Campbell cannot be allowed to retire—but left vague and unclear almost everything else. *See, e.g.*, *Consumers Energy Co. v. Midcontinent Indep. Sys. Op., Inc.*, 192 FERC ¶ 61,158, at PP 39–40 (2025) (recognizing the variety of interpretations of the Campbell order and settling on "the most reasonable reading of the DOE Order's intended scope"). The May Campbell Order failed to make clear even where the grid supposedly needed energy from Campbell, selectively quoted sources without examining their context and core findings, and flouted Congress' explicit limitations on the Department's Section 202(c) powers. *See* Motion to Intervene and Request for Rehearing and Stay of Sierra Club et al. at *passim* (June 18, 2025), https://www.energy.gov/sites/default/files/2025-07/PIO%20Request%20for%20Rehearing%20of%20Order%20No.%20202-25-3.pdf.

After preventing Campbell's retirement, the Department continued to implement its policy. In addition to the Orders on the NIPSCO and CenterPoint Indiana Plants, the Department has issued Section 202(c) orders to prevent fossil-burning plant retirements in Pennsylvania, Order Nos. 202-25-4, 202-25-8, & 202-25-10, in Washington, Order No. 202-25-11, and in Colorado, Order No. 202-25-14.

Additionally, on July 7, 2025, the Department published the "methodology" required by the Grid EO, which the Department explained will "guide reliability interventions," including the use of Section 202(c) orders. Ex. 96 at vi (July 2025 Resource Adequacy Report); *see also* Ex. 97 at 3–4 (DOE July 7, 2025 Press Release) ("The methodology also informs the potential use of DOE's emergency authority under Section 202(c) of the Federal Power Act."). The report identifies no present or imminent emergency; at most, using deeply flawed methodology, it identifies a theoretical shortfall of generation in 2030. As the Supreme Court has observed in rejecting the Trump Administration's emergency import tariffs, "'Emergency powers,' after all, 'tend to kindle emergencies.'" *Learning Resources, Inc. v. Trump*, 607 U. S. ____ (2026), Slip Op. *12 (quoting *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U. S. 579, 650 (1952)). Here, the asserted "emergency" by the Department is likewise merely an outgrowth of the Administration's policy preferences.

Taken together, the Energy Emergency EO, Grid EO, July 2025 Resource Adequacy Report, and the Department's Section 202(c) orders reflect a policy to promote the long-term preservation of fossil-fueled electric generation, including coal-fired generation, by using the Department's emergency authority under Section 202(c). To the extent these actions left any room for doubt that the Department has

such a policy, Energy Secretary Wright's own words have removed it. In his statement to the press when the Centralia Order issued, Secretary Wright emphasized, "The Trump administration will continue taking action to keep America's coal plants running." Ex. 133 (Department Press Release on Centralia Order); *see also* Ex. 149 at *passim* (New York Times Article on Trump's Coal Plant Policy); Ex. 76 (Secretary Wright's West Virginia Remarks) (reporting Secretary Wright's stated intention to stop the closure of coal plants and claiming authority to do so).

The Department has further reinforced this policy by applying it in the Orders.

A. The Orders Address Circumstances Beyond the Lawful Scope of an Emergency Under Section 202(c), and Fail to Provide Evidence or Reasoned Decision-Making Substantiating the Existence of an Emergency that Can Come Within Section 202(c).

1. Legal Framework: Section 202(c) Empowers the Department to Respond Only to Imminent, Certain, and Unexpected Shortfalls in Electricity Supply.

The Orders invoke Section 202(c) of the Federal Power Act, which provides:

> "During the continuance of any war in which the United States is engaged, or whenever the Commission determines that an emergency exists by reason of a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation of transmission of electric energy . . . the Commission shall have authority . . . with or without notice, hearing, or report, to require by order such temporary connections of facilities and such generation, deliver, interchange, or transmission of electric energy as in its judgment will best meet the emergency and serve the public interest."

16 U.S.C. § 824a(c)(1). That authority was transferred to the Department by the Department of Energy Organization Act. *See* 42 U.S.C. § 7151(b).

Section 202(c)'s text and context establish that an "emergency" enabling the Department to over-ride state and private decision-making must be an event that is imminent, certain, and unexpected. 16 U.S.C. § 824a(c). The constrained scope of Section 202(c)'s emergency authority is confirmed by the broader statutory context—in particular, the separate regime delineating federal authority over bulk-system reliability in Section 215 of the Federal Power Act, *id.* § 824o—as well the Department's regulations, caselaw applying Section 202(c), and the Department's consistent past practice.

i. The Text and Context of Section 202(c) Confine an Emergency to Imminent, Certain, and Unexpected Events.

Section 202(c)'s text empowers the Department to require generation only in an "emergency." *Id.* § 824a(c). Both the ordinary meaning of the term (which the statute does not expressly define) and statutory context limit the Department's emergency authority to imminent, unexpected, and certain events. At the time Congress enacted Section 202(c), Webster's New International Dictionary of the English Language (1930) defined "emergency" as, with emphasis added here, a "*sudden* or *unexpected* appearance or occurrence… An *unforeseen* occurrence or combination of circumstances which calls for *immediate* action or remedy; *pressing* necessity; exigency." Contemporary dictionaries similarly define "emergency" as demanding imminence: an emergency is "an *unforeseen* combination of circumstances or the resulting state that calls for *immediate* action." Merriam Webster's Dictionary 407 (11th ed. 2009) (emphasis added); *see* 3 Oxford English Dictionary 119 (1st ed. 1913) (defining emergency similarly as "a state of things *unexpectedly* arising, and urgently demanding *immediate* action" (emphasis added)); *see also* Benjamin Rolsma, *The New Reliability Override*, 57 Conn. L. Rev. 789, 812 n.147 (2025) (noting that dictionaries have given the term "emergency" the "same meaning for many years").

The remainder of Section 202(c) underscores the exigency inherent in the governing term "emergency." The authority granted by Section 202(c) is, in the first instance, a war-time power. 16 U.S.C. § 824a(c) (beginning with "[d]uring the continuance of any war in which the United States is engaged"); *see Jarecki v. G.D. Searle & Co.*, 367 U.S. 303, 307 (1961) (noting that statutory terms should be interpreted in the context of nearby parallel terms "in order to avoid the giving of unintended breadth to the Acts of Congress"). An "emergency" under the statute is limited to circumstances of similar urgency: "a *sudden* increase in the demand for electric energy," for example. 16 U.S.C. § 824a(c) (emphasis added); *see Richmond Power & Light v. FERC*, 574 F.2d 610, 615 (D.C. Cir. 1978) (holding that Section 202(c) "speaks of 'temporary' emergencies, epitomized by wartime disturbances"); S. Rep. No. 74-621, at 49 (1935) (explaining that Section 202(c) provides "temporary power designed to avoid a repetition of the conditions during the last war, when a serious power shortage arose").

The text's use of the present tense accentuates its focus on imminent and certain shortfalls: It empowers the Department to act only where "an emergency *exists*." 16 U.S.C. § 824a(c) (emphasis added). The Section's title and text both emphasize that it provides a "temporary" authority, further demonstrating that its scope extends only to immediate—not distant—needs. *Id.* § 824a(c), (c)(1); *see Dubin v. United States*, 599 U.S. 110, 120–21 (2023) (cleaned up) ("The title of a statute and the

heading of a section are tools available" to resolve "the meaning of a statute," and "a title is especially valuable where it reinforces what the text's nouns and verbs independently suggest."). That near-term focus precludes use of Section 202(c) to pursue broader or long-term energy-policy goals, such as a "fear of overdependence" on foreign oil supplies, *Richmond Power & Light*, 574 F.2d at 617, or "energy independence," Ex. 96 at 1 (July 2025 Resource Adequacy Report); *see also Richmond Power & Light*, 574 F.2d at 614 (Section 202(c) "speaks of 'temporary' emergencies, epitomized by wartime disturbances, and is aimed at situations in which demand for electricity exceeds supply and not those in which supply is adequate but a means of fueling its production is in disfavor.").

Section 202's overall structure further highlights Section 202(c)'s emphasis on imminent, near-term concerns. The preceding subsections in Section 202 (*i.e.*, 202(a) and (b)) together define and limit the tools by which the federal government may pursue "abundant" energy supplies in the normal course. 16 U.S.C. § 824a(a) (seeking "abundant supply of electric energy" by directing the federal government to "divide the country into regional districts for the voluntary interconnection and coordination of facilities for the generation, transmission, and sale of electric energy"); *id.* § 824a(b) (allowing federal government to order "physical connection . . . to sell energy to or exchange energy" upon application, and after an opportunity for hearing). The resulting statutory "machinery for the promotion of the coordination of electric facilities" comprises the following: in subsection (a), an instruction to establish a general framework meant to facilitate "coordination by voluntary action;" in subsection (b), "limited authority to compel interstate utilities to connect their lines and sell or exchange energy," subject to defined procedural and substantive requirements, when "interconnection cannot be secured by voluntary action;" and in subsection (c), "much broader" but "temporary" authority "to compel the connection of facilities and the generation, delivery, or interchange of energy during times of war or other emergency." S. Rep. No. 74-651 at 49 (1935).

That tiered structure—placing primary emphasis on voluntary resource adequacy planning, 16 U.S.C. § 824a(a), specifying limited authority where that voluntary system fails, *id.* § 824a(b), and allowing for "temporary" central command-and-control only in case of an "emergency," *id.* § 824a(c)—requires that Section 202(c) remain narrowly confined to instances of an immediate and unavoidable "break-down in electric supply," S. Rep. No. 74-651 at 49 (1935), rather than a mere desire for more abundant supply in the future, *cf.* Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 5 (December Culley Order); Ex. 158 at 8 (March Schahfer Order); Ex. 159 at 8 (March Culley Order) (emphasis added) (pointing to conditions that "will continue in the near term" and "are also *likely* to continue in *subsequent years*" that "*could* lead to the loss of power . . . in the areas that *may* be affected by curtailments or power outages, presenting a *risk* to public health and safety"). The

tiered structure authorizes increasingly intrusive federal intervention, but under increasingly narrow circumstances. Interpreting Section 202(c)'s "emergency" powers to permit the Department to compel generation based on nothing more than the generalized challenges of operating a reliable bulk electric system in a transforming energy landscape, or concerns over longer term resource adequacy, *see* Ex. 1 at 2 (December Schahfer Order), Ex. 2 at 1, 2 (December Culley Order) Ex. 158 at 1, 2 (March Schahfer Order); and Ex. 159 at 1, 2 (March Culley Order), would unwind the careful balance of voluntary, market-driven action and federal power set out in Sections 202(a) and 202(b). Such an interpretation cannot be squared with the statutory text and structure. *See Otter Tail Power Co. v. Fed. Power Comm'n*, 429 F.2d 232, 233–34 (8th Cir. 1970) (holding that Section 202(c) "enables the Commission to react to a war or national disaster," while Section 202(b) "applies to a crisis which is likely to develop in the foreseeable future").

ii. Congress' Enactment of a Specific, Cabined Scheme to Address Reliability Concerns Confirms That Generalized or Long-Term Bulk-Power System Reliability Concerns Are Not an "Emergency" Under Section 202(c).

That the Department's Section 202(c) emergency powers do not extend to general supervision of bulk-power-system reliability is confirmed by Section 215 of the Federal Power Act—which specifically and directly delineates the scope of federal authority to enforce mandatory reliability requirements for the bulk-power system. 16 U.S.C. § 824o. Congress added Section 215 to the Federal Power Act in 2005 precisely because the Act as it then existed—including Section 202—did not give the federal government the power to enforce measures designed to ensure bulk-system reliability. *See Rules Concerning Certification of the Elec. Reliab. Org.; and Procedures for the Establishment, Approval, and Enforcement of Elec. Reliab. Standards*, 70 Fed. Reg. 53117, 53118 (Sept. 7, 2005) ("In 2001, President Bush proposed making electric Reliability Standards mandatory and enforceable," leading to enactment of Section 215 in 2005); Ex. 139 at 7-6 (*Report of the Nat'l Energy Pol'y Dev. Grp.*) (noting that "[r]egional shortages of generating capacity and transmission constraints combine to reduce the overall reliability of electric supply in the country" and that "one factor limiting reliability is the lack of enforceable reliability standards" because "the reliability of the U.S. transmission grid has depended entirely on *voluntary* compliance," and then recommending "legislation providing for enforcement" of reliability standards (emphasis added)); S. Rep. No. 109-78 at 48 (2005) (stating that Section 215 "changes our current voluntary rules system" for bulk-system reliability "to a mandatory rules system"); *see also Alcoa, Inc. v. FERC*, 564 F.3d 1342, 1344 (D.C. Cir. 2009) (noting that prior to the Energy Policy Act of 2005, "the reliability of the nation's bulk-power system depended on participants' voluntary compliance with industry standards").

By enacting Section 215, Congress provided a comprehensive and carefully circumscribed scheme to empower the federal government to enforce bulk-system reliability requirements. That statutory scheme strikes a careful balance between state and federal authority, and between private, market-driven decisions and top-down control. Reliability standards are devised by NERC independent "of the users and owners and operators of the bulk-power system" but with "fair stakeholder representation." 16 U.S.C. § 824o(c)–(d); *see also id.* § 824o(a)(3) (defining reliability standards as "a requirement . . . to provide for reliable operation of the bulk-power system"). FERC may approve or remand those standards (but not replace them with its own) and is required to "give due weight" to NERC's "technical expertise" while independently assessing effects on "competition." *Id.* § 824o(d)(2)–(4). Section 215 provides specified enforcement mechanisms and procedures for reliability standards—which mechanisms conspicuously exclude the power to command specific generation resources to remain operational. *Id.* § 824o(e). And Section 215 carefully preserves state authority over "the construction of additional generation" and in-state resource adequacy, establishing regional advisory boards to ensure appropriate state input on the administration of reliability standards. *Id.* § 824o(i)–(j).

Interpreting Section 202(c) to permit the Department to mandate generation based on its own unfettered assessment of bulk-system reliability needs would effectively allow the Department to bypass Section 215's procedural safeguards, constraints on federal authority, and protection of state power. Such a bypass would impermissibly "contradict Congress' clear intent as expressed in its more recent," reliability-specific legislation, enacted "with the clear understanding" that the Department had "no authority" to address long-term reliability through Section 202(c). *See FDA v. Brown & Williamson Tobacco Corp.*, 529 U.S. 120, 142 & 149 (2000); s*ee also Cal. Indep. Sys. Operator Corp. v. FERC*, 372 F.3d 395, 401–02 (D.C. Cir. 2004) ("Congress's specific and limited enumeration of [agency] power" over a particular matter in one Section of the Federal Power Act "is strong evidence that [a separate Section] confers no such authority on [agency]."). Congress has, in Section 215, directly established the mechanisms (and limitations) by which the federal government may compel action to ensure the reliability of bulk-power electric system. In so doing, it has confirmed that the Department may not, through Section 202(c) "emergency" orders, use those reliability concerns to mandate the generation it views as required to address broad resource adequacy problems ; the Department's emergency authority is confined to specific and imminent supply shortfalls requiring immediate response.

iii. The Department's Regulations Similarly Establish that Section 202(c) Emergency Authority Can Only Be Invoked to Address Imminent, Certain Supply Shortfalls Requiring Immediate Response.

The Department's regulations demonstrate its own long-standing understanding that Section 202(c)'s emergency authority is confined to imminent, certain, and otherwise unavoidable resource shortages, and does not provide a mechanism to address broad, long-term concerns as to the reliability of the bulk-power system. The regulations recognize that an emergency under Section 202(c) requires, first, "a *specific* inadequate power supply situation." 10 C.F.R. § 205.371 (emphasis added). The Department's non-specific dissatisfaction with regional power planning does not, consequently, empower the Department to override that planning by emergency order. The need for both specificity and certainty is repeated in the Department's regulations defining an inadequate energy supply: "A system may be considered to have" inadequate supply when "the projected energy deficiency . . . *will* cause the applicant [for a 202(c) Order] to be unable to meet its normal peak load requirements based upon use of all of its otherwise available resources so that it *is* unable to supply adequate electric service to its customers." *Id.* § 205.375 (emphasis added). The same provision suggests that an emergency will generally exist only when "the projected energy deficiency . . . without emergency action by the [Department], will equal or exceed 10 percent of the applicant's then normal daily net energy for load." *Id.*

The regulations further recognize that Section 202(c) does not provide a means of planning against months-off expectations or risks. They define an emergency as "an *unexpected* inadequate supply of electric energy which may result from the *unexpected* outage or breakdown" of generating, transmission, or distribution facilities—not a tool to ensure future energy abundance, or override state and private planning that the Department deems inadequate. 10 C.F.R. § 205.371 (emphasis added). Emergencies are characterized by shortages produced by "weather conditions, acts of God, or unforeseen occurrences not reasonably within the power of the affected 'entity' to prevent." *Id.* Where the culprit is increased demand, it must be "a *sudden* increase in customer demand," *id.* (emphasis added), rather than demand projections producing non-immediate reliability concerns.

And while the regulations suggest that "inadequate planning or the failure to construct necessary facilities can result in an emergency," they recognize that the Department may not utilize a "continuing emergency order" to mandate long-term system planning. *Id.* The regulations also recognize that "where a shortage of electricity is projected due solely to the failure of parties to agree to terms, conditions, or other economic factors" there is no emergency "unless the inability to supply electric service is *imminent*." *Id.* (emphasis added). An emergency may exist

where past planning failures produce an immediate, present-tense shortfall (that is where, a shortfall *results* from insufficient planning); the Department has no authority to commandeer bulk-system reliability planning merely because it deems current plans inadequate. *See* 10 C.F.R. § 205.375 (requiring present inability to meet demand to demonstrate inadequate energy supply). As the Department stated when it promulgated those regulations, the statute allows the Department to provide "assistance [to a utility] during a period of unexpected inadequate supply of electricity," but does not empower it to "solve long-term problems." *Emergency Interconnection of Elec. Facilities and the Transfer of Elec. to Alleviate an Emergency Shortage of Elec. Power,* 46 Fed. Reg. 39984, 39985–86 (Aug. 6, 1981).

iv. Courts Have Uniformly Held that Section 202(c) Can Be Invoked Only in Immediate Crises.

Caselaw applying Section 202(c) further supports the narrow circumstances under which it permits the Department to seize command of the power system. *Richmond Power and Light* arose out of the 1973 oil embargo. The Federal Power Commission responded to the embargo by calling for voluntary transfer of electricity from non-oil power plants to areas of the country that relied heavily on oil, such as New England. 574 F.2d at 613. The New England Power Pool was not convinced that the voluntary program would work and petitioned the Commission for a 202(c) order. *Id*. Rather than issue such an order, the Commission facilitated an agreement between state commissions and supplying utilities, which satisfied the New England Power Pool, leading it to withdraw its petition. *Id*. A dissatisfied utility sought judicial review of the Commission's decision to allow the withdrawal of the Section 202(c) petition. *Id*. at 614.

The court easily upheld the Commission's decision not to invoke Section 202(c). *Id*. Though the oil embargo had ended, the utility argued that the "high cost and uncertain supply of imported oil" justified an emergency order. *Id*. The Commission countered that the voluntary program had worked, the New England Power Pool never interrupted service, and there was no need for a Section 202(c) order. *Id*. at 615. The D.C. Circuit agreed. *Id.* The utility alternatively argued that "dependence on imported oil leaves this country with a *continuing* emergency." *Id*. (emphasis added). The court observed that Section 202(c) "speaks of 'temporary' emergencies, epitomized by wartime disturbances." *Id*. Interpreting this statutory language, the court upheld the Commission's view that Section 202(c) cannot be used when "supply is adequate but a means of fueling its production is in disfavor." *Id*.

Richmond Power & Light thus teaches that Section 202(c) is not an appropriate means to implement long-term national policy to switch fuels. The provision allows only a temporary fix for a temporary problem.

The Eighth Circuit has similarly held that Section 202(c) can only be used to respond to immediate crises. In *Otter Tail Power*, a utility insisted that the only way for the Federal Power Commission to properly order the utility to connect to a municipal power provider was to issue a Section 202(c) order. 429 F.2d at 234. Demand for electricity in the city had increased, and the peak load of the municipal power provider was getting to be so high that both of its two generators would likely need to be used simultaneously in the near future, "causing a possible loss of service should one malfunction during a peak period." *Id.* at 233–34. To avoid this possible loss of service, the Federal Power Commission issued a Section 202(b) order, requiring the utility to connect to the municipal power provider. *Id.* The utility argued that the Federal Power Commission used the wrong provision and should have used Section 202(c) instead. *See id.*

The court explained that Section 202(c) "enables the Commission to react to a war or national disaster" by ordering "immediate" interconnection during an "emergency." *Id.* at 234. For non-emergency situations, "[o]n the other hand, Section 202(b) applies," including when there is a "crisis which is likely to develop in the foreseeable future but which does not necessitate immediate action on the part of the Commission." *Id.* The court upheld the Commission's use of Section 202(b) instead of Section 202(c) because there was no immediate emergency. *See id.* The case law uniformly supports the interpretation that Section 202(c) can only be used in short-term, urgent emergencies.

v. The Department's Prior Orders Recognize that Section 202(c) Does Not Confer Plenary Authority Over Bulk-System Resource Adequacy.

The Department's consistent application of Section 202(c) before 2025 further corroborates the urgency of the emergency conditions that are the necessary predicate for any Department intervention under Section 202(c). *See Fed. Trade Comm'n v. Bunte Bros., Inc.*, 312 U.S. 349, 352 (1941) ("[J]ust as established practice may shed light on the extent of power conveyed by general statutory language, so the want of assertion of power by those who presumably would be alert to exercise it is equally significant in determining whether such power was actually conferred."). Since obtaining authority under Section 202(c) in the 1970s and before 2025, the Department has consistently used Section 202(c) to address specific, imminent, and unexpected shortages—not to address longer-term reliability concerns or demand forecasts. *See, e.g.*, Ex. 9 at 1 (DOE Order No. 202-22-4) (responding to ongoing severe winter storm producing immediate and "unusually high peak load" between Christmas Eve and Boxing Day); Ex. 17 at 1–2 (DOE Order No. 202-20-2) (responding to shortages produced by ongoing extreme heat and wildfires); Ex. 105 at 1 (DOE Order No. 202-08-1) (ordering temporary connection of facilities in response to "massive devastation caused by Hurricane

Ike," leaving "large portions" of Texas "without electricity"); *see also* Rolsma, 57 Conn. L. Rev. at 803–04 (describing "sparing[]" use of Section 202(c) outside of wartime shortages during the twentieth century).[12] Public Interest Organizations are not aware of any instance in which, before 2025, the Department utilized Section 202(c) to mandate generation the Department viewed as necessary to ensure long-term resource sufficiency, or in response to generalized regional risks that had not produced any particular, defined generation shortfall, and for good reason: Any such use would exceed the Department's statutory authority.

2. The Order Primarily Focuses on Long-Term Bulk-System Reliability, Which Is Not an Emergency Under Section 202(c), and Separately the Claimed Long-Term Emergency is Unreasoned and Not Based on Substantial Evidence.

The Orders primarily rely upon assertions of long-term bulk-system reliability concerns. *See* Ex. 1 at 1–4 (December Schahfer Order); Ex. 2 at 1–4 (December Culley Order); Ex. 158 at 1-6 (March Schahfer Order) at 1-6; Ex. 159 at 1-6 (March Culley Order). Those concerns—even if fully substantiated—would not be a basis to mandate Culley's and Schahfer's continued operation. And they are not substantiated. MISO, the Indiana Commission, NIPSCO and CenterPoint Indiana have taken and are continuing to take steps to address longer-term concerns to ensure no resource shortfall arises.

i. Even Assuming Arguendo *Evidentiary Support, the Department's Long-Term Concerns Are Not an "Emergency" Within the Meaning of 202(c).*

The Orders claim "a potential longer term resource adequacy emergency in MISO," acknowledging a "capacity surplus for the summer of 2026," but citing projections of possible "insufficient capacity to meet the peak demand for electricity in each of the following four summers"—that is, arising no earlier than the Summer of 2027. Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 5 (March Schahfer Order); Ex. 159 at 5 (March Culley Order) (also noting

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[12] The Department has also narrowly tailored the remedies in Section 202(c) orders to ensure that the orders only address the stated emergency, to limit the order to the minimum period necessary, and to mitigate violations of environmental requirements and impacts to the environment. *See, e.g.*, Ex. 9 at 4–7 (DOE Order No. 202-22-4) (limiting order to the 3 days of peak load, directing PJM to exhaust all available resources beforehand, requiring detailed environmental reporting, notice to affected communities, and calculation of net revenue associated with actions violating environmental laws); Ex. 17 at 3–4 (DOE Order No. 202-20-2) (limiting order to the 7 days of peak load, directing CAISO to exhaust all available resources beforehand, requiring detailed environmental reporting).

"surplus of generation capacity" in the Winter of 2026, "followed by increasing deficits the following four years."). Even if the Orders' claimed emergency conditions were established (they are not), reliability concerns arising beyond "the near term . . . in subsequent years," Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 5 (December Culley Order) Ex. 158 at 8 (March Schahfer Order); Ex. 159 at 8 (March Culley Order), do not qualify as an emergency under Section 202(c). Such concerns are neither imminent nor unexpected. The Department's stated concerns cannot plausibly be characterized as a "*sudden* increase in the demand for electric energy" or a "shortage" in electric energy, generation, or transmission" constituting an emergency. 16 U.S.C. § 824a(c)(1).

At most, the Orders describe long-term trends that may affect the reliability of the bulk power system in the future if left unaddressed. The Orders' longer-term concerns are based on projections of demand increases, changes in the mix of power supply resources, challenges in resource development, and the Administration's view of foreign actors. *See* Ex. 1 at 1–4 (December Schahfer Order); Ex. 2 at 1–4 (December Culley Order); Ex. 158 at 1-5 (March Schahfer Order); Ex. 159 at 1-5 (March Culley Order).

While many of the Orders' stated concerns are the province of state, regional, and private entities, Congress has provided certain mechanisms for the federal government to address the reliability concerns raised in the Orders. The emergency provision in Section 202(c), along with the Department's claimed power to seize command-and-control authority over generating resources like Schahfer and Culley 2, are not among those mechanisms.

The congressionally provided mechanisms to the federal government include Section 202(a), which allows the federal government to pursue "an abundant supply of electric energy" but only by facilitating "*voluntary* interconnection and coordination of facilities for the generation, transmission, and sale of electric energy" 16 U.S.C. § 824a(a) (emphasis added). Additionally, under certain circumstances, Section 202(b) allows the federal government to require utilities to sell or exchange energy with other facilities, but only upon application and with "no authority to compel the enlargement of generating facilities for such purposes." *Id.* § 824a(b).

Another mechanism, Section 215, provides for mandatory, nationwide reliability standards developed and enforced by a federally certified but independent entity. 16 U.S.C. § 824o(d), (e). "These standards," the Department explains, "ensure that all owners, operators, and users of the bulk-power system have an obligation to maintain system security and reliability." Ex. 52 at 7 (Department Export Authorization EA-365-C (Oct. 21, 2025)). The standards cannot be enforced by ordering generation facilities to operate, and Section 215 specifically disallows requiring the "construction

of additional generation" or "enforc[ing] compliance" with "adequacy" standards. 16 U.S.C. § 824o(e), (i)(2).

The Orders purport to mandate generation based upon the Department's assessment of the bulk-power system's long-term reliability needs, a power Congress chose not to provide *any* federal agency. *See* 16 U.S.C. § 824o(e) (specifying enforcement mechanisms for federal reliability standards). And what authority Congress has authorized to implement mandatory reliability standards, it provided to FERC—not the Department. *Alcoa,* 564 F.3d at 1344. Reliability concerns in future years simply do not constitute an emergency within the meaning of Section 202(c).

Section 202(c) provides an explicitly "temporary" authority, 16 U.S.C. § 824(a)(c), preventing any interpretation of its terms that might encompass a potential longer term resource adequacy emergency. The expansive interpretation of Section 202(c) implicit in the Orders, stretching the meaning of "emergency" to cover resource planning concerns over "years" beyond the near term, is further precluded by the Federal Power Act's express background principles of permitting "Federal regulation" only of "matters which are not subject to regulation by the States," and disavowing "jurisdiction, except as specifically provided" over "facilities used for the generation of electric energy." 16 U.S.C. § 824(a), (b)(1); *see Duke Power Co. v. Fed. Power Com.,* 401 F.2d 930, 938 (D.C. Cir. 1968) (explaining that the Federal Power Act's policy declarations are "relevant and entitled to respect as a guide in resolving any ambiguity or indefiniteness in the specific provisions which purport to carry out its intent"). The Department knows that "resource adequacy planning and capacity requirements . . . have traditionally been the domain of state regulatory commissions, NERC-certified Regional Entities, and RTOs/ISOs," *i.e.*, not the Department. Ex. 52 at 5 n.4 (Department Export Authorization EA-365-C (Oct. 21, 2025)).

Through the Orders, the Department expressly seeks to override the decisions of state, regional, and utility planners pursuant to the procedures established by Congress to ensure abundant electricity supplies and the reliability of the bulk-electric system. 16 U.S.C. §§ 824a(a)–(b), 824o. Section 202(c) does not permit that effort to transform the statutory scheme from one driven primarily by market- and state-based decision-making to one consolidating centralized federal command-and-control in the Department. And it especially does not permit that transformation in service of the Department's desire to dictate "how much coal-based generation there should be over the coming decades"—a power that the Supreme Court has found Congress "highly unlikely" to have left to agency discretion. *West Virginia v. EPA*, 597 U.S. 697, 729 (2022).

ii. The Order Does Not Demonstrate Any Long-Term Resource Adequacy Concerns that Are Not Already Being Addressed Through the Appropriate Processes Under the Federal-State Balance of Responsibilities.

In addition to being an invalid basis for Department action under Section 202(c), the Orders' discussion of long-term concerns is unreasoned and without substantial evidence, including because the Orders both overestimate the potential of a shortfall and undervalue the ability of existing processes to address any projected shortfall. The following sections examine the several bases for the Department's claim of a long-term emergency; as they explain, none of those bases provide any actual evidence that Department intervention is necessary.

a. The Department Misinterprets the OMS-MISO Survey.

One of the Department's principal citations for its claim that MISO faces a long-term shortfall is the OMS-MISO Survey. Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 5 (March Schahfer Order); Ex. 159 at 5 (March Culley Order) (discussing Ex. 89 at 2, 7, 9 (2025 OMS-MISO Survey)). The Department's description of the OMS-MISO Survey is fundamentally flawed.

Broadly speaking, the purpose of the OMS-MISO Survey is to explore a wide range of potential outcomes based on current trends, to ensure that MISO is aware of the full spectrum of possibilities (including remote ones) for which it may need to secure adequate resources to ensure grid reliability. See *supra* section IV.B.3 (discussing the OMS-MISO Survey). In keeping with that purpose, the Survey applies assumptions to the bottom end of its forecasts that are extremely unlikely to reflect reality. This worst-case scenario contains extremely conservative assumptions about how much of the new generation that utilities have actively planned for is able to become operational. See Ex. 89 at 5–6 (2025 OMS-MISO Survey).

The Department creates the illusion of a long-term emergency by citing only to this bottom edge, studiously ignoring the rest of the range of outcomes that were considered. In short, the Department cherry-picks the data in the Survey that confirm the Department's own biases.

No example of the Department's selective interpretation of the evidence is more obvious than the Department glossing over the fact that the OMS-MISO Survey projects a near-certain surplus of resources through at least May 2027. *See* Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 2–3 (December Culley Order); Ex. 158 at 5 (March Schahfer Order); Ex. 159 at 5 (March Culley Order). In other words, the Department's own citation provides no basis to think that Schahfer or Culley are needed for over a year. The Department attempts to undermine this projection by

calling it "potential" and suggesting that "at least 3.1 GW of additional generation capacity" would need to be added. *Id*. But this phrasing is not consistent with the study, in which the most conservative estimate concludes there will be a surplus in 2026; and the phrasing ignores the reality that new resources are built in MISO every year. 3.1 GW is fewer resources than came online per year over the past three years, and that was before utilities began accelerating new resource development in response to increasing load projections. *See* Ex. 89 at 6 (2025 OMS-MISO Survey). The Department's claim that MISO needs at least 3.1 GW of new generation is also factually incorrect because it ignores 1.4 GW of existing resources that are not currently committed to retire, but which were excluded from the Survey's projections because they were identified as having a "low certainty" of continued operation in 2026—if even one of those resources doesn't end up retiring, it would reduce the need for new resources below 3.1 GW. Ex. 89 at 5, 7 (2025 OMS-MISO Survey).

The Department's discussion of later-year projections is even more misleading. *See* Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 5 (March Schahfer Order); Ex. 159 at 5 (March Culley Order). The OMS-MISO Survey examines MISO's resource adequacy projections using two alternate assumptions for how quickly new resources can be built. The first assumption relies on a "historical" projection. The historical projection predicts 3.5 GW of new resources per year based on a three-year historical average, plus 1.2 GW of replacement resources per year based on historical levels. The Survey's "historical" projection also assumes that only half of utilities' planned upgrades to existing facilities will actually take place. Ex. 89 at 5, 7 (2025 OMS-MISO Survey).

The second assumption relies on an "emerging" projection "based on member submittals to the OMS-MISO Survey" (*i.e.*, what utilities have told OMS-MISO they are actually planning to build). The emerging projection predicts 6.2 GW of new resources per year and 2.4 GW of replacements per year. Ex. 89 at 5–6 (2025 OMS-MISO Survey).

The Department cites exclusively to the "historical" projection, ignoring the "emerging" projection entirely—but this paints an excessively pessimistic picture of the future. The Survey's estimated 1.4 to 8.2 GW deficits from 2027/28 to 2030/31 in the historical projection are more than matched by its forecast 6.4 to 11.4 GW surpluses over the same period in its emerging projection. *Id*. at 7. And again, both of these projections ignore entirely the possibility that any of the 1.4 to 3.8 GW of "potentially unavailable resources" turns out to in fact still be available. The Department's decision to ignore the half of the OMS-MISO Survey that is inconsistent with its emergency declaration has no basis in the structure of the

Survey: the two projections are explicitly presented as "bookend capacity forecasts." *Id*. at 6.

By ignoring the emerging projection, the Department unreasonably fails to take into account several key factors that support that projection. First, the historical 2022 to 2024 new capacity build rate is not likely to be reflective of future build because the scope of the need for new generation only became clear in the past year or two: indeed, MISO added almost 5 GW of new resources in 2024, which was about 50 percent more than the MISO region had ever built before. *Id*. Second, the historical projection underestimates future contributions of storage, because MISO currently only has roughly 164 MW of operational storage, meaning that the historical trend still does not account for the coming influx of battery storage resources. And third, the historical projection's assumption that only half of utilities' "replacement" and "surplus" projects will actually occur has no actual historical basis, because these are new categories of projects that MISO therefore has no historical data on. *Id*. at 5 (indicating that replacement and surplus projects were not considered for the 2024 Survey).

The Department has also ignored other information in the OMS-MISO Survey that indicates the possibility of even more new generation coming online than either of the two projections in the Survey anticipate. For instance, the survey indicates that 54 GW of projects have a signed generator interconnection agreement but are waiting to interconnect. *Id*. at 6. A review of historic trends is instructive here: ninety percent of projects with signed generator interconnection agreements ultimately get built. See Ex. 120 at 6 n.* (2024 OMS-MISO Survey). Assuming that trend continues—and the circumstances of increasing demand provide good reason to think it will—48 GW of the total 54 GW projects currently with signed generator interconnection agreements will come online.

Additionally, there are about 291 GW of projects in MISO's interconnection queue. Ex. 121 at 7:15–17 (Witmeier 2025 ERAS Testimony). MISO's historic interconnection queue completion rate is twenty-one percent, see Ex. 112 at 21:2–5 (Witmeier 2024 Queue Cap Testimony), which would equate to another 61 GW (291 GW × 21% = 61.1 GW) of new projects interconnecting from the current queue. Together, those two groups represent more than 109 GW of new resource additions that MISO could reasonably expect to come online in the next several years.

b. Neither the Energy Emergency Executive Order nor the Grid Reliability Executive Order provides a valid basis to declare an emergency under Section 202(c).

The Department also cites to the Energy Emergency EO and the Grid EO claiming that there is an energy emergency and that the grid is being stressed by

unprecedented demand. Ex. 1 at 3–4 (December Schahfer Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 6–7 (March Schahfer Order); Ex. 159 at 6–7 (March Culley Order). Neither of these executive orders is valid evidence of an actual energy emergency.

If the Orders' reference to a national energy emergency is meant to serve as evidence of an emergency as defined under Section 202(c), it is insufficient. Claims recited in an Executive Order are not substantial evidence supporting agency action. Substantial evidence is "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." *Chritton v. Nat'l Transp. Safety Bd.,* 888 F.2d 854, 856 (1989) (internal quotation marks omitted). And an emergency under Section 202(c) must be a specific inadequate power supply situation. See *supra* sec. V.A.1; *e.g.*, 10 C.F.R. § 205.371 (emphasis added). In the quoted passages from the Energy Emergency EO, the President offered his perspective on issues relating to the nexus between energy usage and "our Nation's economy, national security, and foreign policy." But these themes are simply not relevant to assessing whether an "emergency" exists under Section 202(c)(1) and the Department's regulations under 10 C.F.R. § 205.371. Thus, the Orders provide no specific evidence of inadequate generation nationwide, let alone in Indiana or even in MISO specifically. An emergency under Section 202(c) also must be imminent. See *supra* sec. V.A.1. But even the Department's other cited evidence demonstrates clearly that there is nothing imminent about even the most tenuous projected shortfalls. Nothing in the Orders refers to a shortage in the actual time period covered by the Orders.

Even if the declared national energy emergency were legitimate, a presidential declaration of an emergency does not unlock unlimited agency powers. *See Biden v. Nebraska*, 600 U.S. 477, 500-01 (2023) (presidential declaration of national emergency does not change the limitations on agency's emergency authority as written into statute). President Trump issued the Energy Emergency EO pursuant to authority from the National Emergencies Act.[13] Congress explained that the

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[13] Under the National Emergencies Act, no emergency powers unlocked by a Presidential declaration of a national emergency "shall be exercised unless and until the President specifies the provisions of law under which he proposes that he, or other officers will act." 50 U.S.C. § 1631 (emphasis added). The Energy Emergency EO does not adhere to this requirement. Ex. 92, 90 Fed. Reg. at 8,434 (Energy Emergency EO) (generically directing agencies to "identify and exercise any lawful emergency authorities available to them, as well as all other lawful authorities they may possess, to facilitate the . . . generation of domestic energy resources.").

National Emergencies Act "is not intended to enlarge or add to Executive power. Rather, the statute is an effort by Congress to establish clear procedures and safeguards for the exercise by the President of emergency powers conferred on him by other statutes." S. Rep. No. 94-1168, 3 (1976), (emphasis added). But Section 202(c)'s authority is not triggered by a Presidential emergency declaration; the statute requires that "the Commission determine[] that an emergency exists." 16 U.S.C. § 824a (emphasis added).[14] Thus, the burden is on the Department to demonstrate that there is an emergency pursuant to the narrow language of Section 202(c); simply pointing to the Energy Emergency EO or the Grid Reliability EO without providing actual evidence that an emergency exists results in an arbitrary and capricious order.

c. The Department's July 2025 Resource Adequacy Report does not substantiate its claim of a long-term resource adequacy shortfall.

The Orders also briefly cite to the Department's July 2025 Resource Adequacy Report as evidence of a potential emergency years down the road. Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 4 (December Culley Order); Ex. 158 at 7 (March Schahfer Order); Ex. 159 at 7 (March Culley Order) (citing Ex. 96 (July 2025 Resource Adequacy Report)). But that Report does not credibly project conditions in 2030 because of its many inaccurate assumptions and methodological errors.[15] Moreover, that Report offers no actual evidence of any near-term shortfall.

Most glaringly, the Report overestimates demand growth and expected facility retirements while underestimating the likelihood of new entry. This biases the entire report in the direction of over-identifying resource adequacy concerns. Ex. 113 at 21–25 (Inst. Pol'y Integrity Report); see also Ex. 68 at 7 (Grid Strategies Sept. Report) (explaining that the July 2025 Resource Adequacy Report relies on load growth and capacity retirement assumptions that are "drastically higher" than those provided by the U.S. Energy Information Administration, the arm of the Department tasked with "independent statistics and analysis"); Ex. 122 at 2–3 (GridLab Report) (noting that the July 2025 Resource Adequacy Report fails to account for the potential flexibility of data center load additions; that the Report assumes double the retirements and only a quarter of the firm resource additions

[14] The Department has exercised certain powers under Section 202(c) since the DOE Organization Act of 1977. 42 U.S.C. § 7151(b).

[15] A group of organizations including several of the PIOs here have raised several concerns with this Report in a separate rehearing request. See generally Ex. 99 (RFR of July Resource Adequacy Report).

assumed by the Energy Information Administration; and that the report ignores "fast-track" interconnection processes recently approved by FERC for multiple RTOs); Ex. 99 at 34-35 (PIOs' RFR of July Resource Adequacy Report) (citing multiple expert reports and initiatives demonstrating the potential for flexibility of large data center loads, including Ex. 123 (Duke University Rethinking Load Growth Study)).

The Report also "departs from best [modeling] practices by using a deterministic modeling rather than a probabilistic approach," and thereby fails to account for necessary uncertainties. Ex. 113 at 19 (Inst. Pol'y Integrity Report). And in many places the Department simply does not explain its own methodology. The report states that its model is derived from NERC's Interregional Transfer Capability Study, which is focused on the ability of the transmission system to transfer power between regions. Ex. 96 at 2 (July 2025 Resource Adequacy Report). However, the report inexplicably excludes new transmission projects from its analysis, ignoring that transmission improvements can be the most cost-effective way to improve grid reliability. The Department's report also appears to misunderstand certain principles of statistical reasoning, calling out PJM for failing loss-of-load criteria under one realization of a possible weather year that would include Winter Storm Elliott, without considering that a system's LOLE is averaged across all simulated weather years. Ex. 113 at 19 (Inst. Pol'y Integrity Report); Ex. 96 at 7, 9, 27 (July 2025 Resource Adequacy Report). The Department also added more "perfect capacity" (in megawatts) within its modeling than actually needed to bring regions to its targeted Normalized Unserved Energy level. Ex. 113 at 26 (Inst. Pol'y Integrity Report); Ex. 96 at 19, 27, 30, 32, 40 (July 2025 Resource Adequacy Report). These analytical failings in and of themselves disqualify the report as a viable source of evidence for an emergency finding.

The lack of evidence for a long-term emergency is underscored by the fact that the Department's own analysis premises a resource adequacy shortfall on a type of demand increase (large load buildout), Ex. 96 at 2–3, 15–17 (July 2025 Resource Adequacy Report), that the report goes on to admit would likely never actually be allowed to destabilize the grid. Specifically, the report notes that its analysis "is not an indication that reliability coordinators would allow this level of load growth to jeopardize the reliability of the system." *Id*. at 14. In other words, even taking the report at face value, it does not identify a shortfall of a type and nature that could ever justify invocation of the Department's Section 202(c) emergency authority. At best, the report highlights that data centers cannot be built at projected rates unless new generation is built, which is far from the type of emergency situation that could ever provide the basis for a Section 202(c) order.

Finally, on its opening page, the report acknowledges that its analysis is general in nature, looking at the country as a whole, and that the various "entities responsible for the maintenance and operation of the grid" have information "that could further enhance the robustness of reliability decisions" in the sections of the grid they administer. *Id.* at i. This type of generalized analysis based on incomplete information is simply insufficient to justify a Section 202(c) emergency finding for MISO or any other specific region.

d. MISO has designed its ERAS proposals to address claimed shortfalls and has not suggested that any further generation/capacity is needed.

There is one place where MISO has projected a distant resource adequacy need: in the course of requesting FERC approval for its proposed Expedited Resource Addition Study, which FERC approved in July 2025. Ex. 90 at 6, 13–17 (MISO ERAS Transmittal Letter); Ex. 91 (MISO ERAS Decision). But, as explained above, sec. IV.B.3, that projected need spurred MISO to initiate a process that will add at least 26.5 GW (and likely more) of new capacity to MISO's system over the next several years.

The Department minimizes the import of this approval by suggesting that the projects won't reach commercial operation for at least three years and could be further delayed by supply chain constraints. Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 6 (March Schahfer Order); Ex. 159 at 6 (March Culley Order). But the Department's first statement is factually incorrect—projects that are selected for ERAS could begin operation sooner than three years from the application date; they just have up to six years of leeway—and its second statement is far too conjectural to provide a basis for an emergency declaration. Ex. 91 at P 84 (MISO ERAS Decision). The Department cannot defensibly declare an emergency justifying use of its 202(c) authority based on a concern that the expedited interconnection process MISO has established specifically to meet projected resource adequacy needs won't work—absent substantial and specific evidence of that fact, it is pure conjecture.

e. The North American Electric Reliability Corporation's Recent Assessment Does Not Support the Claimed Long-Term Emergency.

The March Schahfer and Culley Orders' reliance on the 2025 Long-Term Reliability Assessment published in January 2026 by NERC as evidence supporting the claimed emergency is also inapposite. Ex. 158 at 6-7 (March Schahfer Order); Ex. 159 at 6-7 (March Culley Order). The report discloses on its face that, for example, it took no consideration of the ERAS interconnection process. Ex. 177 at 8, 15 (NERC Jan. 2026 LTRA). "If ERAS projects come in as currently planned, the projected reserve margin shortfall would be eliminated." *Id.* at 15. The report also

lists no elevated risk for the year 2026, which covers the time period of the March Schahfer and Culley Orders. *Id*. at 8. The Department could have and should have accounted for those factors. The report also acknowledges that state regulators and utilities are "statutorily required to ensure reliability" and generally work to align large load additions, generator retirements, and generator additions. *Id* at 15.

Expert analysis of the Long-Term Reliability Assessment reveals other shortcomings as well. The Assessment failed to consider *any* generation which has begun, but not yet completed system studies, Ex. 166 at 11 (Grid Strategies LTRA Review). Failing to include even a fraction of these resources currently in the queue is unrealistic, and improperly suggests resource shortfalls by wholesale ignoring the resources that will add additional capacity to the system. A more realistic analysis that discounts resources in the study process by historic dropout rates found that MISO is on pace to add enough generation to maintain resource adequacy. *Id.* at 12. Likewise, the Assessment did not account for chip-industry manufacturing limitations in its forecast of data center load, or how data center load flexibility could decrease capacity demands of data center expansion. *Id.* at 19–24. The result of these oversights is an assessment which likely overstates risk. *Id.* at 31 (showing the MISO region as being on track to meet capacity needs in 2030).

f. <u>The Generic Testimony of a Single MISO Executive on which the Department Relies Is Contradicted by Numerous More Concrete Statements by MISO.</u>

Finally, the March Schahfer and Culley Orders cite to testimony by Jennifer Curran, a current MISO executive, that speaks in general terms about MISO's need for capacity. Ex. 158 at 7–8 (March Schahfer Order); Ex. 159 at 7–8 (March Culley Order) (citing Ex. 178 (Curran Testimony)). As an initial matter, Ms. Curran's testimony is sufficiently vague that it is open to any number of interpretations. Her testimony provides no timeline for the risk she communicates, nor does it state how great the reliability risk is, or how much bigger it could get, from the various systemic trends she discusses. *See* Ex. 178 at 4–6 (Curran Testimony). This generic testimony is taken from an opening statement to Congress; it is also several steps removed from the concrete, tangible, and specific evidence that is necessary for the Department to find that there is a resource adequacy emergency.

The March Schahfer and Culley Orders' treatment of Ms. Curran's testimony is a prime indicator of unreasoned decision-making because it misrepresents aspects of the testimony, cherry-picks only favorable statements while omitting unfavorable statements, and wholly ignores related evidence undercutting the Department's position. For example, the ~~November~~ Orders misrepresent Ms. Curran's testimony in suggesting she "acknowledged the Nation's current energy crisis." Ex. 158 at 7

(March Schahfer Order); Ex. 159 at 7 (March Culley Order). In fact, Ms. Curran never said or implied that there is any crisis or emergency. Moreover, the Department conspicuously omits elements of her testimony cutting against the Department's invocation of Section 202(c) authority. For example, Ms. Curran testified that "[i]mproving existing market and operations processes tool is a cost-effective and timely way to improve reliability in an efficient manner." Ex. 178 at 7 (Curran Testimony). She further testified that the risks of generation plant retirements can be addressed by allowing *local* reliability requirements to determine the pace of retirements. *Id.* Ms. Curran's recommendations for future action do not include the Department's use of Section 202(c) orders, nor do they include coal-fired power generation. *See id.* at 9–10.

The March Schahfer and Culley Orders also fail to mention or consider statements by other MISO executives rebutting the Department's conclusion that there is a resource adequacy deficiency. For instance,

> In a statement, MISO said it will "continue coordinating with Consumers Energy to comply with the [Campbell 202c Orders]." But MISO again stressed that J.H. Campbell did not clear the planning resource auction and is unnecessary for resource adequacy in the 2025/26 planning year. "MISO's 2025–2026 Planning Resource Auction indicated adequate resources to meet anticipated demand. . . .," MISO spokesperson Brandon Morris said in a statement to RTO Insider.

Ex. 117 (RTO Insider Article on August Order). The March Schahfer and Culley Orders further ignore testimony from MISO's Internal Market Monitor at a FERC technical conference that MISO "[was] more than adequate" for the Summer of 2025 and that the IMM has no substantial resource adequacy concerns "in the near term." Ex. 35 at 2 (Patton MISO Comments). The Internal Market Monitor was even more candid when he stated in March 2026 with respect to the Orders that, "It's pretty easy to come the conclusion that none of these orders are actually needed." Ex. 179 at PDF p. 2 (RTO Insider March 2026 Article). Finally, the Orders fail to consider that MISO has never requested that a 202(c) order be issued to Schahfer or Culley.

3. The Orders Do Not, and Could Not, Provide any Valid Evidence or Reasoned Decision-Making to Support Their Stated Near-Term Resource Adequacy Concerns.

The claimed near-term emergency in the Orders is unspecific. And none of the sources cited in the Orders, separately or together, establishes factual circumstances that come close to a near-term emergency or otherwise meet the definition of "emergency" that permits Departmental action under Section 202(c). 16

U.S.C. § 824a(c)(1). The Orders also rely on these sources in a vacuum, failing to consider many other analyses of which the Department is aware or should be aware. The Orders' near-term emergency determination is unjustified, unreasoned, and not based on substantial evidence.

i. The Described Concerns Are Insufficiently Specific and Certain to Meet the Statutory Definition of an Emergency.

The Orders gesture at the possibility of electricity shortfalls in the "near" term, but offer no plausible evidence of such shortfalls. See *infra* sec. V.A.3.ii.

That failure to adduce plausible evidence to one side, the generalized, speculative risks described by the Orders are neither specific nor certain enough to qualify as an "emergency" within the meaning of Section 202(c). 16 U.S.C. § 824a(c). A notional suggestion of some possible shortfall, which might (or might not) require generation from Schahfer or Culley 2, is not a "specific inadequate power supply situation" enabling the use of the Department's Section 202(c) authority. 10 C.F.R. § 205.371.

The Department does not find that there will be a single supply shortfall during the entirety of each 90-day term of the four recently issued orders. Ex. 1 at *passim* (December Schahfer Order); Ex. 2 at *passim* (December Culley Order); Ex. 158 at *passim* (March Schahfer Order); Ex. 159 at *passim* (March Culley Order). Nor does the Department point to any specific circumstances even giving rise to a risk of such a shortfall. Ex. 1 at *passim* (December Schahfer Order); Ex. 2 at *passim* (December Culley Order); Ex. 158 at *passim* (March Schahfer Order); Ex. 159 at *passim* (March Culley Order). For the duration of the four Orders—from December 23, 2025 through March 23, 2026 and March 24, 2026 through June 21, 2026—the Department's near-term justification amounts to the simple assertion that "MISO's year-round resource adequacy concerns are well documented." *See* Ex. 1 at 1 (December Schahfer Order); Ex. 2 at 1 (December Culley Order); Ex. 158 at 2 (March Schahfer Order); Ex. 159 at 2 (March Culley Order). At most, this conclusory statement asserts the possibility that some resource inadequacy might (or might not) emerge somewhere in MISO—but that does not, and cannot, demonstrate that "an emergency exists by reason of a sudden increase in the demand for electric energy" or an identified "shortage of electric energy" or of "facilities for the generation or transmission of electric energy." 16 U.S.C. § 824a(c)(1); *see also Louisville & N.R. Co. v. Sullivan*, 617 F.2d 793, 795 (D.C. Cir 1980) (explaining that where statute permits emergency orders based on determination that a "facility or piece of equipment [is] in unsafe condition, the agency may not issue order based on "a generalized poor safety record" without showing of "particular" safety hazard). The Orders do not describe or provide

support for—even taken on their own terms—any imminent, specific, or certain electricity shortfall. The Orders therefore fail to describe an "emergency" within the meaning of Section 202(c).

ii. The Claimed Shortfall Is Unreasoned and Not Supported by Substantial Evidence.

The Orders fail to employ reasoned decision-making and fail to offer substantial evidence of an emergency in the Spring 2026 season (which is most of the period it covers) or the upcoming Summer 2026 season. Instead, the Orders review and recite information from several MISO documents, misinterpreting and misrepresenting the materials to allege a resource adequacy crisis that simply does not exist. The Orders also misstate grid conditions during the recently completed Winter 2025–2026 season.

The first example of this flawed reasoning is the Orders' statement that " 'new capacity additions were insufficient to offset the negative impacts of decreased accreditation, suspensions/retirements and external resources' in the northern and central zones, which include Indiana." Ex. 1 at 2 (December Schahfer Order) (quoting Ex. 31 at 13 (MISO 2025–26 Auction Results)); Ex. 2 at 2 (December Culley Order) (quoting same); Ex. 158 at 5 (March Schahfer Order) (quoting same); Ex. 159 at 5 (March Culley Order) (quoting same). As in prior Section 202(c) orders last year, *e.g.*, Ex. 124 at 2 (November Campbell Order), the Department fails to note that this statement referred to *offers* rather than available supply, and particularly only to the netting of additions and subtractions causing total North/Central offers to decrease in absolute terms from Summer 2024 to Summer 2025. *See* Ex. 31 at 13 (MISO 2025–26 Auction Results). The Department also fails to acknowledge that overall resource offerings in MISO North/Central were sufficient relative to the Reserve Margin Requirement, which also decreased from 2024 to 2025. *Compare* Ex. 84 at 16 (MISO 2024–25 Auction Results) (showing a Summer 2024 Reserve Margin Requirement of 100,710 MW in Zones 1–7), *with* Ex. 31 at 18 (MISO 2025–26 Auction Results) (showing a Summer 2025 Reserve Margin Requirement of 99,770.5 MW in Zones 1–7).

This result also tracks MISO's Planning Auction results which, as explained above, *supra* secs. IV.A.2.ii, IV.B, resulted in MISO securing more resources for Spring 2026 than it determined were necessary to ensure resource adequacy. In short, it was clear in April 2025, when MISO released its 2025–2026 Planning Auction results, that the MISO system had no resource adequacy crisis this Spring even after accounting for announced plant retirements, including the Schahfer and Culley retirements. The Orders fail to acknowledge these critical facts undercutting the Orders' emergency determination.

The Orders also gesture to various recent reports in which MISO has forecasted an increasing resource adequacy risk in non-Summer seasons. See Ex. 1 at 1–2 (December Schahfer Order); Ex. 2 at 1–2 (December Culley Order); Ex. 158 at 4 (March Schahfer Order); Ex. 159 at 4 (March Culley Order). However, the Department does not appear to have carefully examined what MISO was actually saying in any of these materials.

First, the Department quotes from MISO's 2021 capacity accreditation filing, in which MISO described a shift of reliability risks "from 'Summer only' to a year-round concern," apparently for the proposition that the Winter and Spring seasons also experience meaningful systemic risks. Ex. 1 at 1 (December Schahfer Order) (quoting Ex. 77 at 3 (MISO 2021 Transmittal Letter)); Ex. 2 at 1 (December Culley Order) (quoting same); Ex. 158 at 2 (March Schahfer Order) (quoting same); Ex. 159 at 2 (March Culley Order) (quoting same). The relevant graph in the 2021 Transmittal Letter shows an incidence of MaxGen events across all four seasons from 2014 through 2022 but says nothing about how serious these events were. *See* Ex. 77 at 3 (MISO 2021 Transmittal Letter). A simple review of MISO's actual MaxGen events would have revealed that none of the Winter events exceeding the "MaxGen Warning" level ascended to the level (MaxGen Event Step 5) that entails manual shedding of load. Ex. 32 at *passim* (MISO Emergency Declarations); see *supra* sec. IV.A.3, IV.B.1. In other words, recent winter storms have presented a challenge for MISO—but even the most severe episodes in recent years have failed to cause actual load shedding. And as explained above, MISO's own assessment is that the Winter does not yet have anything close to the grid vulnerability of Summer. The Orders also say absolutely nothing about system risks specific to the Spring season.

Next, the Orders cite MISO's 2023 Attributes Roadmap, which (according to the Orders) established that "by the summer of 2027, there will be an equal loss of load risk in both the summer and fall seasons" and "the risk of loss of load in the winter and spring seasons, although not as high as in the summer or fall, will nevertheless increase over time." Ex. 1 at 2 (December Schahfer Order) (citing Ex. 85 at 11 (MISO Attributes Roadmap)); Ex. 2 at 1–2 (December Culley Order) (citing same); Ex. 158 at 3 (March Schahfer Order) (citing same); Ex. 159 at 3 (March Culley Order) (citing same). But again, the Orders fail to discuss the magnitude of risk at issue. The implicated graph on page 11 of the MISO Attributes Roadmap identifies loss of load risks that peak around hour 20 with around 150 hours of expected lost load, Ex. 85 at 11 (MISO Attributes Roadmap), but those 150 hours (from 3,750

runs of the model)[16] correspond to a lower risk than the industry-standard acceptable risk target. Specifically, the LOLE risk is .05 days/year, or 50% of the industry-standard target of 0.1 days per year. Ex. 86 at 7, 19 (MISO Attributes Roadmap Technical Appendix); *see generally* Ex. 10 at 2–3 (Grid Strategies June Report) (discussing LOLE risk targets). The Department thus fails to make a reasoned determination and fails to account for record evidence detracting from its determination, because its discussion of "equal" risk fails to mention that the absolute risk in both seasons remains extremely low.

Furthermore, the graph that the Orders cite in the MISO Attributes Roadmap does not even refer to the present Spring seasons. *See* Ex. 85 at 11 (MISO Attributes Roadmap). Instead, it refers to projected risk in Winter 2027–28 and makes clear that there was minimal such risk in Winter 2023–24; but it is entirely silent as to the risk profile in Winter 2025–26, which is the only season that is remotely relevant to the Orders' claim of a near-term emergency. *See id.* And the resource mix for Winter 2025–26 looks much more similar to that in Winter 2023–24 (when risk was not concentrated in the Winter season) than to MISO's projected Winter 2027–28 mix—so the 2023 chart is a more useful predictor of likely risk allocation in Winter 2025–26. *See* Ex. 68 at 1–2 (Grid Strategies Sept. Report). As further discussed below, the Orders may not use the possibility of risks in future Winter or Spring seasons as evidence that actual risks exist in the current Spring season—particularly where, as here, there is concrete evidence demonstrating that no such risk exists.

Finally, the Orders gesture to MISO's 2024 Reliability Imperative Report, which mentions "risks in non-summer months that rarely posed challenges in the past." Ex. 1 at 2 (December Schahfer Order) (quoting Ex. 87 at 12 (MISO's Response to the Reliability Imperative); Ex. 2 at 2 (December Culley Order) (quoting same); Ex. 158 at 4 (March Schahfer Order) (quoting same); Ex. 159 at 4 (March Culley Order) (quoting same). But the "Response to the Reliability Imperative" offers no specific information about Winter and Spring season risks other than its qualitative discussion of recent winter storms. *See generally* Ex. 87 at *passim* (MISO's Response to the Reliability Imperative).

Additionally, the Department's own export authorizations undercut the claimed emergency. The Department has continued to grant entities the authority to export power from parts of MISO into Canada. *See* Department Export Authorizations

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[16] For a given season, 15 weather years and 250 random outage samples per weather year are modeled. Ex. 86 at 7 (MISO Attributes Roadmap Technical Appendix). 15 × 250 = 3,750.

Library, https://www.energy.gov/oe/export-authorization-library (last visited Apr. 19, 2026); *e.g.*, Ex. 2-52 at 11–12 (Department Export Authorization EA-365-C (Oct. 21, 2025)) (authorizing exports from multiple interconnection points in Michigan and Minnesota).

Under Section 202(e), the Department shall approve an authorization to export power "unless, after opportunity for hearing, it finds that the proposed transmission would impair the sufficiency of electric supply within the United States or would impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the Commission." 16 U.S.C. § 824a(e). The Department interprets the "sufficiency" prong of Section 202(e) "to mean that sufficient generating capacity and electric energy must exist such that the export could be made without compromising the energy needs of the exporting region, including serving all load obligations in the region while maintaining appropriate reserve levels." Ex. 2-52 at 3–4 (Department Export Authorization EA-365-C (Oct. 21, 2025)). To address this prong, the Department "examines whether existing electric supply is available via market mechanisms, and whether potential reliability issues linked to supply problems are mitigated by reliability enforcement mechanisms." *Id.* at 4. The Department interprets the "coordination" prong of Section 202(e) "primarily as an issue of the operational reliability of the domestic electric transmission system" and, "[a]ccordingly, the export must not compromise transmission system security and reliability." *Id.*

The Department's authorizations to export power from MISO (and other areas) to Canada demonstrate the false basis of the Orders' emergency determination. For instance, in a recent export authorization, the Department explains why allowing exports to Canada will not impair the sufficiency of domestic electric supply. "From an economic perspective," which the Department explains regards "the supply available to wholesale market participants," the Department "finds that the wholesale energy markets are sufficiently robust to make supplies available to exporters and other market participants serving United States regions along the Canadian and Mexican borders." *Id.* at 4. And from a reliability perspective, through which the Department "focuses on preventing problems that could result from inadequate supplies," the Department says nothing about possible inadequate supplies. *Id.* Instead, the Department recounts the multi-layered and "comprehensive" reliability processes that "ensure[] that bulk-power system owners, operators, and users have a strong incentive both to maintain system resources and to prevent reliability problems that could result from movement of electric supplies through export." *Id.* at 5–6; *see also id.* at 7–8 (explaining further some authorities of balancing authorities and reliability coordinators).

The Orders do not reconcile the Orders' emergency determination with the export authorizations' findings that markets in the area are sufficiently robust to make supplies available, and that multi-layered and comprehensive reliability processes incentivize maintenance of system resources. The Orders are thus unreasoned and not based on substantial evidence.

Notably, while the Orders attempt without justification to sow doubt about resource adequacy in non-summer seasons generally, they provide no evidence indicating any actual risk of inadequate supply in the Spring 2026 season, which is the time period mainly at issue in the Orders. This is a staggering abdication of the Department's obligation to provide sound evidentiary backing for its emergency declarations and further confirms that there is no remotely sound reason to be concerned about resource adequacy shortfalls in Spring 2026.

Finally, as explained above in Section IV and in the Konidena April Declaration, Ex. 173 at 8, the Department erroneously claims that MISO's conservative operations during Winter Storm Fern "demonstrate" MISO's resource adequacy concerns. It is improper to draw broad conclusions about the stability of the grid from late winter to mid-spring based on a single event in January (which ignores the significant variation in conditions that grid operators face in different seasons). Moreover, MISO's operation of the grid during Winter Storm Fern maintained full electric service to all customers using exactly the resources (power imports, demand-side resources, and maximum generation alerts) that Public Interest Organizations have explained are designed for this purpose and intended to be used in such circumstances. MISO maintained grid reliability during the entirety of Winter Storm Fern even in the face of unexpected software and mechanical issues that interfered with its operations, and its standardized responses to the event served their purpose. The capacity of the generators subject to the Department' s 202(c) orders in MISO—Schahfer, Culley 2, and Campbell—were not needed to provide capacity even during the highest-load hours of Winter Storm Fern. S*ee* Ex. 173 at 8 (Konidena April Declaration).

B. The Orders Are Not Based on Reasoned Decision-Making and Substantial Evidence in Imposing Requirements to Best Meet the Claimed Emergency and Serve the Public Interest.

The Orders determine that additional dispatch of Schahfer and Culley 2 are necessary to best meet the purported emergency and serve the public interest. But the Orders provide no rational basis for that determination. The Orders do not address the limitations of either the Schahfer or Culley 2 plant, or explain how, in light of those limitations the Plants could even meet the claimed emergency. In fact, both Plants are unlikely to be able to do so. The Orders do not examine the expense

of running any of the units or the associated environmental damage, factors which cause additional dispatch of the plant to harm, rather than serve, the public interest. And the Orders do not address readily available and obvious alternatives which, in point of fact, would better meet the claimed emergency. The Orders also fail to consider how they are causing economic damage by, *inter alia*, crowding out otherwise competitive resources, disrupting planning, and creating policy-driven uncertainty. See Ex. 137 at PDF pp. 2–3 (R Street Institute Commentary: *DOE "Zombies" Are Eating Competitive Power Markets*). Consequently, and for the reasons further discussed in the following subsections, the Order is without support in the record, unreasoned, and unlawful. *Allentown Mack*, 522 U.S. at 374; *State Farm*, 463 U.S. at 42–43, 51; *Burlington Truck Lines*, 371 U.S. at 168; *Butte Cnty.*, 613 F.3d at 194.

1. Legal Framework: Section 202(c)(1) Authorizes the Department to Require Only Generation that Best Meets the Emergency and Serves the Public Interest.

Section 202(c)(1) authorizes the Department to impose only those requirements that (i) "best" (ii) "meet the emergency and" (iii) "serve the public interest." 16 U.S.C. § 824a(c)(1).

The term "best" demands a comparative judgment that there are no better alternatives. The word "best" is inherently a comparative term and means "that which is 'most advantageous.'" *Entergy Corp. v. Riverkeeper, Inc.*, 556 U.S. 208, 218 (2009) (*quoting* Webster's New International Dictionary 258 (2d ed.1953)); *cf. Sierra Club v. Env't. Prot. Agency*, 353 F.3d 976, 980, 983–84 (D.C. Cir. 2004) (explaining that statutory "best available control technology" requirement demands sources in a category clean up emissions to the level that peers have shown can be achieved). Consequently, the Department must, at minimum, consider alternatives and evaluate whether and to what extent a given alternative addresses the emergency and serves the public interest, including deficiencies associated with the alternative.[17]

The Department's obligation to exercise reasoned decision-making further requires consideration of alternatives. The Department need not consider every conceivable alternative, but it must consider alternatives within the ambit of the regulatory context as well as alternatives which are significant and viable or

[17] To be sure, the nature and extent to which the Department must consider alternatives depends on the emergency. An emergency that truly requires the Department to act within hours, for instance, permits a more abbreviated consideration than an emergency for which the Department has days to decide.

obvious. *See Dep't of Homeland Sec. v. Regents of the Univ. of Calif.*, 591 U.S. 1, 30 (2020); *Motor Vehicle Manufs. Ass'n of the U.S. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 51 (1983); *Nat'l Shooting Sports Found., Inc. v. Jones*, 716 F.3d 200, 215 (D.C. Cir. 2013). Intervenors and the public may also introduce information that requires the Department to evaluate alternatives and reconsider its decision to impose or maintain a requirement. *See, e.g.*, *Chamber of Com. of the U.S. v. Secs. & Exch. Comm'n*, 412 F.3d 133, 144 (D.C. Cir. 2005) (evaluating agency failure to consider alternative raised by dissenting Commissioners and introduced by commenters); *cf.* 10 C.F.R. § 205.370 (stating ability to cancel, modify, or otherwise change an order).

The Department's regulations and practice identify relevant alternatives for its consideration. The regulations specify information the Department shall consider in deciding to issue an order under Section 202(c), and require an applicant for a 202(c) order to provide the information. 10 C.F.R. § 205.373. The specified information includes "conservation or load reduction actions," "efforts . . . to obtain additional power through voluntary means," and "available imports, demand response, and identified behind-the-meter generation resources selected to minimize an increase in emissions." *Id.* §§ 205.373(f)–(h); Ex. 9 at 4 (DOE Order No. 202-22-4).

The Department may then choose only the best alternative. The best alternative is the one that is most advantageous for meeting the stated emergency and serving the public interest.

The statutory command to take only measures that serve the public interest, including with respect to environmental considerations, further constrains the Department's authority. The public interest element demands that the Department advance, or at least consider, the various policies of the Federal Power Act. *Cf. Wabash Valley Power Ass'n*, 268 F.3d at 1115 (interpreting the "consistent with the public interest" standard in Section 203 of the Federal Power Act); *see Gulf States Utils. Co. v. Fed. Power Comm'n*, 411 U.S. 747, 759 (1973); *California v. Fed. Power Comm'n*, 369 U.S. 482, 484–86, 488 (1962). Primary policies of the Federal Power Act include protecting consumers against excessive prices; maintaining competition to the maximum extent possible consistent with the public interest; and encouraging the orderly development of plentiful supplies of electricity at reasonable prices. *NAACP v. Fed. Power Comm'n*, 425 U.S. 662, 670 (1976) (orderly development); *Otter Tail Power Co. v. United States*, 410 U.S. 366, 374 (1973) (maintaining competition); *Pa. Water & Power Co. v. Fed. Power Comm'n*, 343 U.S. 414, 418 (1952) (excessive prices). And because Section 202(c) expressly protects environmental considerations, these are part of the public interest element too. *See*

NAACP, 425 U.S. at 669 ("[T]he words 'public interest' . . . . take meaning from the purposes of the regulatory legislation.").

2. The Orders do not address the generators' unreliability or explain how, in light of that unreliability, the generators could meet the claimed emergency.

The Orders are unreasoned and not based on substantial evidence in requiring the Plants' availability and operation while failing to address the Plants' unreliability.

Schahfer is old and creaky, with significant reliability issues, as discussed above in section IV.C.3.i. In anticipation of its retirement, NIPSCO has deferred maintenance on Units 17 and 18, further exacerbating the reliability of the plant. These reliability issues raise significant doubt that Schahfer is capable of reliable operation such that it could meet the claimed emergency. In fact, forcing the unreliable Schahfer to continue operating actually threatens grid reliability.

Both Schahfer Unit 17 and Unit 18 have seen repeated and significant unforced outages in recent months, reflecting the units' deteriorating state. In 2024, NIPSCO's equivalent forced outage rate ("EFOR"), which represents the percentage of time (in hours) a unit was unable to generate power for reasons other than planned maintenance, was 18.8% and 13.2% for Schahfer Units 17 and 18 respectively. Ex. 4 at 5 (Powers January Declaration). These rates are substantially worse than the national average for coal-fired units of 12 percent. *Id.*; *see* Ex. 40 at 59 (NERC 2024 Reliability Report). This is driven in part by the fact that the units are so uneconomical. As NIPSCO explains,

> "NIPSCO's coal EFOR has been significantly affected by changing power markets, which has changed the economical dispatch for coal. Infrequent operation for years, which imposes high thermal stresses on a unit, leading to an increase in forced and maintenance outage hours, followed by an increase in the demand for operating hours later in the year, exacerbates the issues."

Ex. 13 at 21 (NIPSCO Performance Metric Collaborative Update).

NIPSCO's coal units are both dilapidated and expensive enough that their net capacity factor—that is, the percentage of a unit's nameplate capacity that it actually produces considering both outages and how often it is scheduled to dispatch—was at 25% for 2024. *Id.* at 22.

The units' outage rate in 2025 has been similarly dismal. Unit 18 has spent more than 5,000 hours, over 212 days, in unforced outages during the first three quarters

of 2025. *See* Ex. 4 at 6 (Powers January Declaration) (citing Ex. 14 at attachment 4-A (Saffran Q1 2025 Outage Testimony); Ex. 15 at attachment 4-A (Saffran Q2 2025 Outage Testimony); Ex. 16 at attachment 4-A, p. 2 (Saffran Q3 2025 Outage Testimony)). Unit 18's L-1 turbine blade separated from the root and fell into the condenser in February, causing an unforced outage that left the unit offline until late June. *See* Ex. 15 at attachment 4-A, p. 2 (Saffran Q2 2025 Outage Testimony). In early July, the unit experienced another outage when one of the L-0 blades on the governor end fell off one third of the way down from the tip. Ex. 16 at attachment 4-A (Saffran Q3 2025 Outage Testimony). The same November 20, 2025 filing from a NIPSCO official reports "significant damage to the upper portion of the condenser tubes on the governor end." *Id.* Unit 18 is quite literally falling apart, and treating the unit as a critical energy asset needed to maintain reliability is facially absurd. Unit 17, while perhaps a bit less dramatically enfeebled, is also falling apart. Unit 17 spent 1,118 hours in unforced outages in 2025. *See* Ex. 4 at 6 (Powers January Declaration) (citing Ex. 14 at attachment 4-A (Saffran Q1 2025 Outage Testimony); Ex. 15 at attachment 4-A (Saffran Q2 2025 Outage Testimony); Ex. 16 at attachment 4-A, p. 2 (Saffran Q3 2025 Outage Testimony)). On September 6, the unit experienced a 201 hour unforced outage to "replace bad tubes and repair previously installed dutchmen." Ex. 16 at attachment 4-A, p. 2 (Saffran Q3 2025 Outage Testimony). In addition to the 1,044 hours cited in the Powers January Declaration, Unit 17 went on forced outage for 74 hours on November 9 due to a water level alarm. Ex. 174 at 7 (Saffran Q4 2025 Outage Testimony).

Repair of Unit 18 to get it to a working state looks impossible within the timeframe of the March Schahfer Order. As NIPSCO's president explained late last year before the Indiana Commission:

> "Unit 18 is in a forced outage; that one will take more time and effort to ultimately get it to where it needs to be, and at some point, if we do get a 202(c) [order], and it continues, we'll likely have to do some work on [Unit] 17 as well. . . . We've taken some steps to be prepared—long lead time equipment, in particular, that ultimately would have to be ordered for us to come in. Frankly, that unit needs to be rebuilt. . . . We're taking some steps to be able to do that, but it will take time; it can take six months or longer for us to ultimately be able to get that unit back to where it would need to be to operate for an extended period of time. It's just the reality of that unit being close to retirement. We're not completely unprepared, but it will take time to get that long lead time items in to be able to make the repairs necessary."

Ex. 53 (IURC 2025 Winter Reliability Forum (December 2, 2025), video recording available at https://www.youtube.com/watch?v=bCzALF4V45M, excerpt beginning at 51:35 timestamp). VP Bryan McCaul explained that, in anticipation of a 202(c) order from the Department, NIPSCO has "had a lot of negotiations with the [original equipment manufacturer], and trying to pull in future possible deliveries on those [replacement turbine] blades, and also looking at the [high pressure and intermediate pressure] turbines. . . . There's a lot of contract stuff happening trying to make sure we are positioned to not have what was originally an 18 month lead time on those blades, maybe be more like March or May." *Id.* at 58:44. More recently, at a March 24, 2026 conference at the Indiana Commission, a NIPSCO representative stated that Schahfer Unit 18 remained out of service and did not offer a specific timeline for bringing it back online and stated only that NIPSCO was "continuing to evaluate" Unit 18's outage. Ex. 180 (IURC March 2026 Affordability Forum (Mar. 24, 2026), video recording available at https://www.youtube.com/watch?v=uXEwNQdi3r0, excerpt beginning at 3:45:19 timestamp). Even in NIPSCO's most optimistic case, Schahfer Unit 18 may not be able to operate through much of the 90-day period for the March Schahfer Order.

At a minimum, the Orders are inconsistent with the long-term and orderly planning processes that utilities undertake to shore up reliable operations; at worst, they set MISO up to rely on generators that will fail unexpectedly.

Even if Schahfer were not falling apart, there is significant reason to think that Units 17 and 18 could not act as reliability resources during the pendency of the December and March Schahfer Orders. NIPSCO has depleted Schahfer's coal stocks as it prepared for retirement. *See* Ex. 18 at 23 & 23 n.14 (Wagner November Testimony) (stating that Schahfer had 16 days coal inventory supply at the end of September 2025, whereas the target is a supply for 40 days with a plus or minus 10 day window of variability). And at the end of December 2025, which was the long-planned retirement date for the Schahfer coal units, coal inventory there was down to 4 days' worth. Ex. 175 at 24 (Wagner February Testimony). And it seems unlikely that NIPSCO would be able to easily return to having reasonable coal stockpiles. As NIPSCO's fuel manager explained to the Indiana Commission, "NIPSCO's [rail] fleet size at the end of [September 2025] can provide 76% of NIPSCO's maximum coal unit demand and at average railroad cycle times." *Id.* at 23. NIPSCO is hampered in its ability to supply Schahfer with coal, and it has limited coal reserves on-site that it can draw from. Nor could NIPSCO easily obtain more train capacity to provide Schahfer additional coal. The same NIPSCO expert explained:

> [T]he availability of coal gondolas is extremely limited and relying on that market to obtain railcars for short-term needs can adversely

> impact coal supply reliability and is not prudent. In addition, the timing of lease terms can preclude fleet size changes as leasing decisions are made on a forward-looking basis. . . . [I]t can take several months to bring cars into the fleet, and it is an even longer process when returning cars. In addition, moving rail cars in and out of service is a costly process. Therefore, the forward-looking nature of lease agreements and the time and costs required to place cars in and out of service make it difficult to make short-term changes to the size of the fleet and it is not prudent, practical, nor economic to dynamically change the fleet size when coal demand deviates from the forecast.

Id. at 21–22 (footnote omitted).

Moreover, even if it had the train cars to get the coal to the plant, NIPSCO sees risk in its ability to source the coal. As NIPSCO explained:

> [V]ariable coal demand impacts supply chain efficiency and can lead to unpredictable coal supplier and railroad performance. . . . Given the uncertainty in the energy markets due to delayed coal generation retirements, projected increases in electricity demand due to the emergence of data centers, crypto mining, and other load growth drivers, there could be volatility in all energy commodity prices that could impact supply. . . . [I]f coal demand increases, utilities may struggle to schedule deliveries as railroads and coal producers have rationalized assets, labor, and production, and it may take time for production and shipments to rise to meet any rapid increase in demand.

Id. at 15–17, 23.

These limitations severely undercut any reliability role Schahfer could reasonably play and are entirely ignored in the Department's March Schahfer Order.

Culley 2 is likewise an unreliable and creaky generator. Culley 2 had an EFOR in 2024 of 32.4% and a net capacity factor of 31.8%. Ex. 22 at 24 (CenterPoint 2024 Performance Report); Ex. 4 at 8 (Powers January Declaration). Like the Schahfer units, the Culley EFOR rates are substantially worse than the national average for coal-fired units of 12 percent. Ex. 4 at 8 (Powers January Declaration); *see also* Ex. 40 at 59 (NERC 2024 Reliability Report). Culley 2 has been experiencing boiler tube leaks that have been causing outages and forcing the unit offline. Ex. 22 at 24 (CenterPoint 2024 Performance Report). And the maintenance issues are likely to get worse, not better. CenterPoint Indiana has anticipated the retirement of Culley

2 and therefore not invested in major maintenance needed to keep the plant operating smoothly, as CenterPoint Indiana's vice president of power operations relayed to the Indiana Commission. "In 2025, the plant will be years past due for a turbine and generator overhaul and will require major boiler work and other capital investments to maintain safe and reliable operation." Ex. 23 at 6 (Wayne Games 2021 Testimony). CenterPoint Indiana reported that its "Culley 2 maintenance expenditure declined about 20% from 2022 to 2023 in [FERC Uniform System of A]ccount[s] 512 (Maintenance of Boiler Plant)." Ex. 4 at 9 (Powers January Declaration) (citing Ex. 152 at PDF pp. 8, 20 (CenterPoint Rate Case Discovery Responses)). "Increased maintenance spending is necessary to minimize the effect of equipment degradation with age and changing operating regimes. Plants such as F.B. Culley that have likely underspent on capital investment and O&M are at greater risk of future forced outages." Ex. 4 at 9 (Powers January Decl.). These entirely foreseeable maintenance issues hampered Culley's operation during the period of the December Culley Order. In fact, CenterPoint Indiana confirmed that during the first 48 days of the December Culley Order, the plant experienced maintenance issues that prevented regular operation of the plant nearly 90% of the time. Ex. 169 at 2 (CenterPoint Letter to USDOE) (describing operational issues during 43 of the first 48 days). It is unlikely that the plant can stay online and operational to address the purported emergency identified by the March Culley Order.

The Orders fail to come to grips with the dangers to grid reliability that they create. Unreliable coal plants like Culley 2 and Schahfer are particularly likely to cause grid disturbances. .

> "Cold snaps, heat waves, and storms have all exposed coal's fragility during grid stress events. Reliability is not just about being dispatchable, it's about delivering performance under stress. Coal plants struggle to do that consistently. For coal plants to truly meet the constant demands of data centers, they would need to run at high capacity factors and avoid major outages, all of which fly in the face of current performance trends. If a large coal plant trips offline while supporting a cluster of data centers, the sudden loss of supply could lead to cascading failures across the grid. This is because generation must equal load at all times, datacenter or no datacenter. As a result, relying on coal plants to support these high-density digital loads doesn't enhance reliability, it endangers it. And it's not a matter of *if* the coal plant will fail, but *when*."

Ex. 118 at PDF pp. 2–3 (RMI Analysis of Coal Plants' Threats to Reliability).

The Department avers that it is concerned with reliability, *see* Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 5 (December Culley Order); Ex. 158 at 8–9 (March Schahfer Order); Ex. 159 at 8–9 (March Culley Order), yet puts forward no analysis to address the likelihood that its Orders might actually create the (otherwise unproven) problem they are supposedly trying to address. The Department mandates generation from old plants which, in anticipation of their retirements, deferred significant maintenance needs, while stylizing the generators as needed for reliability, risking sudden break-downs and grid stability concerns. This ostrich-like approach to record evidence and public information is not reasoned decision-making. *Butte Cnty.*, 613 F.3d at 194; *cf. Ky. Mun. Energy Agency v. FERC*, 45 F.4th 162, 177 (D.C. Cir. 2022) (rejecting "ostrich-like approach" to agency decision-making).

3. The Orders Do Not Address the Plants' Continued Demonstration of Their Technical Inability to Meet the Claimed Emergency.

Separately, the Orders provide no reasoned basis to conclude that Schahfer and Culley 2, even if fully maintained and operational, could meet the claimed emergency, let alone that these Plants are the best way to do so, given the technical specifications and operational limits of the Plants.

Schahfer and Culley 2 are not designed to turn on quickly in response to extreme demand, nor are they capable of ramping their output up and down quickly. The Orders point to projections of demand growth, including from "data centers driving artificial intelligence (AI) innovation." Ex. 1 at 4 (December Schahfer Order) (internal quotation marks omitted); Ex. 2 at 4 (December Culley Order) (same) Ex. 158 at 7 (March Schahfer Order); Ex. 159 at 7 (March Culley Order). Even assuming *arguendo* the Department has authority under Section 202(c) to address that claimed circumstance (it does not), coal plants' "always-on nature" and "rigidity" are "a poor match for the dynamic and often unpredictable nature of data center demand." Ex. 118 at PDF p. 3 (RMI Analysis of Coal Plants' Threats to Reliability); *see also* Ex. 129 at 3 (Energy Innovation Report) (explaining that data center loads "are not 24/7 blocks. Instead, they are choppy, with swings of hundreds of megawatts over short intervals, undermining assumptions of steady baseload behavior and potentially affecting the stability of the grid if safeguards are not put in place."). "[L]arge, voltage-sensitive loads like data centers require flexible, responsive grid solutions, not slow-ramping generators that can take 12 or more hours to come online." Ex. 118 at PDF p. 3 (RMI Analysis of Coal Plants' Threats to Reliability) (relying on NERC). Fast-ramping generators are also needed to respond to extreme emergency demand increases in cases when an emergency is declared only a few hours before the demand must be met. Ex. 4 at 10 (Powers January Declaration).

Schahfer has slow ramp and startup times, as noted above in section IV.C.3.i.b. The two coal generating units have start-up targets of 22 hours after a 1-hour notice and ramp rates of 3 MWs per minute. Ex. 19 at 6 (NIPSCO CPCN Discovery Responses). NIPSCO has recognized that its coal units at Schahfer are ill suited to meet its customers' needs because of their slow ramp and start times. NIPSCO sought and received permission to decommission and reuse the interconnection rights associated with Units 17 and 18 for new gas-fired generators at the same site that would not face these problems. *See* Ex. 20 at 18 (IURC Schahfer Gas Plant Order) (describing NIPSCO's finding that it needed generation with faster ramp rates and start up times); *id.* at 14, 17 (discussing how the proposed CTs would use the interconnection rights associated with retiring units 17 and 18); *id.* at 42 (the Indiana Commission approving NIPSCO's plan to build the CTs in question). The new CT units, in contrast to Units 17 and 18, can start up in as few as 11 minutes and have a ramp rate of 140 MWs per minute, making them significantly more responsive than Units 17 and 18 to swinging demand. Ex. 19 at 6 (NIPSCO CPCN Discovery Responses). The Department's order forcing Schahfer to stay online risks delaying the in-service date for these new responsive units, because the new CT units were designed to come online using the interconnection rights of the retiring units 17 and 18. Considering how the new CT units may now have delayed in-service dates, the December and March Schahfer Orders risk degraded reliability for NIPSCO and MISO customers.

CenterPoint Indiana has reached similar conclusions with regard to Culley 2. CenterPoint Indiana created two proposed generation portfolios for its 2025 integrated resource plan: a "preferred portfolio" which offered among the lowest cost and most flexible operating futures for CenterPoint Indiana in a range of possible future scenarios, and an "alternate preferred portfolio," which offers lowest cost generation solutions assuming significant large load growth. Ex. 21 at 10–11, 165–68, 185–86 (CenterPoint Indiana 2025 IRP). CenterPoint Indiana's analysis found that in the high data center load growth scenario, Culley 2 should be retired and have its interconnection rights used for a battery storage installation at the site to support system capacity and provide additional ramping capability. *See id.* at 10, 185–186; *see also* Ex. 2 at 4 (December Culley Order) (asserting emergency conditions because of data center demand). Even without the large load assumption, use of the Culley 2 interconnection for a battery storage installation is in the preferred portfolio. Ex. 71 at 139, 165–166 (CenterPoint Indiana 2025 IRP).

The Plants are ill-suited to meet the highly variable and rapidly changing load of data centers, even compared to other coal units. The average coal plant takes 12 hours to reach maximum capacity from a cold start. Ex. 55 at 26 (IEA Flexibility Report); Ex. 118 at PDF p. 3 (RMI Analysis of Coal Plants' Threats to Reliability). By comparison, utility-scale battery storage can dispatch from a cold start to full

power in a matter of seconds. Ex. 4 at 10 (Powers January Decl.). Schahfer and Culley 2, with their long startup times, are ill-suited to serve as peaking plants that respond to extreme peak demand on short notice. Ex. 4 at 10–12 (Powers January Decl.).

In short, the Orders fail to examine the inherent mismatch between the problem they diagnose and the mandates they impose. Schahfer and Culley 2 are both falling apart, and unsuited to meet the rapid ramping needs associated with the data center load growth the Orders identify as driving the purported emergency.

4. The Orders Do Not Address or Reflect Consideration of Alternatives.

Other alternatives are available to the Department that better meet the claimed emergency and serve the public interest. MISO has access to robust transmission connectivity between itself and neighboring regions to support the stability of its grid. *See, e.g.*, Ex. 35 at 2 (Patton MISO Comments) ("[I]t is important to recognize that, unlike some other RTOs, MISO has tremendous import capability that is routinely utilized during tight conditions to supplement its internal resources."). During most of the period of the Orders, MISO Zone 6 can import more than 7.5 GW. Ex. 3 at 8 (EFG Report); Ex. 37 at 12 (MISO 2025–2026 CIL/CEL Final Results); *see generally* Ex. 65 at 52–53 (DOE Transmission Planning Study) (documenting interregional variability in electricity demand); Ex. 66 at 22–35 (NERC 2024 Interregional Transfer Capability Study, Part 1) (describing transfer capabilities between MISO and other regions). For the portion of the Orders' period falling in Summer 2026, MISO Zone 6 can import 6,440 MW. Ex. 176 at 4 (MISO 2026–2027 CIL/CEL Results). The Department has long recognized that power pools and utility coordination "are a basic element in resolving electric energy shortages." *Emergency Interconnection of Elec. Facilities and the Transfer of Elec. to Alleviate an Emergency Shortage of Elec. Power*, 46 Fed. Reg. 39,984, 39,985–86 (Aug. 6, 1981). And recent history bears out the important role of transmission connectivity along with imports and exports. *See, e.g.*, Ex. 43 at 64 (Winter Storm Elliott System Operations Inquiry) ("Despite tightening conditions on the MISO system as the morning progressed, MISO maintained steadily increasing exports to TVA throughout the day."); Ex. 44 at 43, 83–84 (PJM Elliott Report) (describing PJM exports of between 8 and 11 GW to TVA, and exports to MISO and other regions); Ex. 36 at 6 (MISO Elliott Max. Gen. Event Overview) ("MISO consistently exported power to southern neighbors with a maximum value of nearly 5 GW[.]"); *see also* Ex. 7 at 1 (DOE Order No. 202-02-1) (providing for usage of interregional transmission).

The Orders fail to consider the alternative of imports and transmission connectivity to meet the claimed emergency. The Orders include no reasonable basis to question the availability of resources from neighboring regions, nor why the

Orders provide a better means of ensuring resource sufficiency than addressing those barriers directly through its power to require "interchange" and "transmission" of electric energy from those neighboring regions. 16 U.S.C. § 824a(c)(1); *see* 10 C.F.R. §§ 205.373(f) & 205.375 (providing for consideration of available resources, including power transfers). The Orders' failure to consider imports and interregional transmission connectivity is unreasoned, and the Orders are not based on substantial evidence.[18]

The Orders also fail to consider limiting exports to Canada from MISO as another alternative to meet the claimed emergency. The Department has authorized many entities to export energy from MISO, including new authorizations in the last year. *See* Department Export Authorizations Library, https://www.energy.gov/oe/export-authorization-library (last visited Apr. 19, 2026); Ex. 2-52 at 11 (Department Export Authorization EA-365-C (Oct. 21, 2025)). In addition to the Department's Section 202(c) authority, Section 202(e) of the Federal Power Act authorizes the Department to supplement or modify its export orders if necessary or appropriate. 16 U.S.C. § 824a(e). The Department could modify its export authorization to halt or limit exports from MISO if the power is needed to avert a true emergency. However, nothing in the Orders points to this as a considered alternative.

C. The Orders Exceed Other Limits on the Department's Authority.

1. The Department Lacks Jurisdiction to Impose the Availability Requirements.

In directing MISO, NIPSCO, and CenterPoint Indiana to take "all measures" to ensure that Schahfer and Culley 2 are "available to operate," Exs. 158 at 8 (March Schahfer Order); 159 at 8 (March Culley Order), the Department exceeds its authority under Section 202(c) of the Federal Power Act and impermissibly intrudes on the authority over generating facilities that Section 201(b) of the statute reserves to the states, 16 U.S.C. §§ 824(b)(1), 824a(c)(1). The sweeping language in the Department's Orders would encompass physical and all other changes necessary to revive a decrepit generating plant undergoing closure pursuant to a state-approved

[18] The Department must also incorporate demand response and other alternatives in determining whether an emergency exists, and as a condition precedent to calling for generation by a polluting resource like Schahfer or Culley 2, a requirement consistent with Departmental practice. See 16 U.S.C. §§ 824a(c)(1)–(2); 10 C.F.R. § 205.375; e.g., Ex. 39 at 4–5 (DOE Order No. 202-22-2); Ex. 45 at 2–3 (DOE Order No. 202-21-1); Ex. 17 at 3 (DOE Order No. 202-20-2). MISO has access to demand response and authority over generator outages. See Ex. 70 at ¶¶ 20–23 (Konidena September Decl.)

retirement process. The Federal Power Act's language, structure, legislative history, and interpretation by the courts all confirm that the Department's Orders are unlawful.

The structure and language of the Federal Power Act reflect Congress's deliberate choices to preserve the states' traditional authority over generating facilities and to circumscribe the Department's emergency authority in light of the states' role. The first sentence of the Federal Power Act declares that federal regulation extends "only to those matters which are not subject to regulation by the States." *Id.* § 824(a). Section 201(b)(1) states that, except as otherwise "specifically" provided, federal jurisdiction does not attach to "facilities used for the generation of electric energy." *Id.* § 824(b)(1). The courts have held that Section 201(b)(1) reserves to the states authority over electric generating facilities, *see, e.g., Hughes v. Talen Energy Mktg., LLC*, 578 U.S. 150, 155 (2016), including the authority to order their closure, *Conn. Dep't of Pub. Util. Control v. FERC*, 569 F.3d 477, 481 (D.C. Cir. 2009) (explaining that under Section 201(b), states retain the right "to require the retirement of existing generators" or to take any other action in their "role as regulators of generation facilities"). Congress also recognized the states' exclusive authority over generating facilities in Section 202(b), which provides that FERC's interconnection authority does not include the power to "compel the enlargement of generating facilities for such purposes." 16 U.S.C. § 824a(b).

There is a clear distinction between authority to regulate generation facilities and the Department's authority under Section 202(c) to require generation of electric energy. Electric energy is an electromagnetic wave, and its "generation, delivery, interchange, and transmission" is the creation and propagation of that wave. *See* Brief *Amicus Curiae* of Electrical Engineers, Energy Economists and Physicists in Support of Respondents at 2, *New York v. FERC*, 535 U.S. 1 (2002); *see also* Edison Electric Institute Glossary of Electric Utility Terms (1991 ed.) (defining electric generation as "the act or process of transforming other forms of energy into electric energy"). Section 202(c)(1), like the rest of the Federal Power Act, is written "in the technical language of the electric art" and federal jurisdiction generally "follow[s] the flow of electric energy, an engineering and scientific, rather than a legalistic or governmental test." *Conn. Light & Power v. Fed. Power Comm'n*, 324 U.S. 515, 529 (1945); *see also Fed. Power Comm'n v. Fla. Power & Light Co.*, 404 U.S. 453, 454, 467 (1972).

The scope of the Department's emergency power under Section 202(c) is bounded both by the provision's specific language and Congress's clear intention and repeated direction in the Federal Power Act to respect the states' authority over generating facilities. When an actual emergency exists, Section 202(c)(1) authorizes the Department to order only two specific things: (1) "temporary connections of

facilities" and (2) "generation, delivery, interchange, or transmission of electric energy." *Id.* § 824a(c)(1). The only reference to "facilities" in the authorizing provision of Section 202(c)(1) appears in the clause relating to temporary connections, not in the clause pertaining to "generation" of electric energy. And that clause only authorizes connections "of" facilities; it does not provide authority to regulate the facilities. The differences in Congress's word choice in these clauses—referencing "facilities" in one authorizing provision but not the other—must be given effect. *See, e.g.*, *Gallardo v. Marstiller*, 596 U.S. 420, 430 (2022); *Gomez-Perez v. Potter*, 553 U.S. 474, 486 (2008).

Given Congress's use of the term "generating facilities" elsewhere in the statute, if it had intended to give the Department authority over generating facilities in Section 202(c)(1), it would have done so explicitly. Instead, the provision conspicuously excludes authority to manage the physical characteristics of power plants. Congress purposely limited and particularized the Department's emergency powers, carefully avoiding intrusion on the states' authority over generating facilities recognized in Section 201(b)(1). *See* S. Rep. No. 74-621, at 19 (explaining that the emergency powers in Section 202(c)(1) "which were indefinite in the original bill have been spelled out with particularity"); *compare* S. 1725, Cong. Tit. II § 203(a) (providing in original, unenacted bill that control of the production and transmission of electric energy "except in time of war or other emergency declared to exist by proclamation of the President, shall, as far as practicable, be by voluntary coordination"), *with* 16 U.S.C. § 824a(c)(1) (providing particularized, specific authorities and circumstances in which the authorities may be exercised).

In certain circumstances, the Department may require generation of electric power, and a utility may properly take steps at the facility to produce the power. It is commonplace in the electric sector for the federal regulator properly acting within its authority to cause effects in a state regulator's jurisdictional sphere, and vice versa. *See Elec. Power Supply Ass'n*, 577 U.S. at 281. But the federal regulator may neither directly regulate generation facilities nor impose requirements aimed at the facilities, even if nominally regulating within its sphere. *See id.* at 281–82; see also *Hughes*, 578 U.S. at 164–65. Such encroachment is impermissible, be it in a real emergency or in a wrongly claimed one. *See Conn. Light & Power*, 324 U.S. at 530 ("Congress is acutely aware of the existence and vitality of these state governments. It sometimes is moved to respect state rights and local institutions even when some degree of efficiency of a federal plan is thereby sacrificed."). Thus, the Department may not require generation that necessitates the utility taking steps under state authority, such as building a new generating unit or refurbishing a broken one.

The Federal Power Act does not give the Department sweeping authority to order "all measures" needed to make a generation facility "available to operate."

Ex. 158 at 8 (March Schahfer Order); Ex. 159 at 8 (March Culley Order); *see* 16 U.S.C. § 824a(c). Nowhere does the statute empower the Department to order "all" steps that may be needed to ensure the availability of Culley 2 and Schahfer, which could include repairs or modifications to physical facilities and other measures going far beyond electric power generation. Because generating units at both Plants are at the end of their useful lives, with years of forgone maintenance and capital expenditures, rendering the units capable of meeting a short-term supply shortfall could essentially require rebuilding significant parts of the Plants. On their face, the Department's Orders are *ultra vires*. The Orders also contravene the Federal Power Act's repeated direction to respect the states' authority over generating facilities, which includes the authority reserved to Indiana to ensure responsible closures of both generators. The Orders therefore are unlawful and should be withdrawn.[19]

2. The Department Lacks Jurisdiction to Disallow Treatment of Schahfer or Culley 2 as a Capacity Resource.

The Orders state that "[b]ecause this order is predicated on the shortage of facilities for generation of electric energy and other causes," Schahfer and Culley "shall not be considered capacity resources." Ex. 158 at 9 (March Schahfer Order); *see also* 159 at 9 (March Culley Order) (directing that Culley 2 shall not be considered a capacity resource). This provision serves only to increase costs to customers, who will be required to procure duplicative capacity as a result. It is also illegal. Section 202(c) authorizes the Commission to "require by order . . . temporary connections of facilities and . . . generation, delivery, interchange, or transmission of electric energy," and then shields facilities that operate pursuant to a Section 202(c) order from liability for unavoidable violations of federal, state, or local environmental laws or regulations. 16 U.S.C. §§ 824a(c)(1), (3). Nowhere does the Federal Power Act suggest that the Department may predetermine or override the reasoned decisions of FERC in its determination of whether just and reasonable wholesale rates require an operating resource to be considered a capacity resource. Indeed, the very nature of 202(c) orders, which are limited to emergencies involving extant resource shortfalls (in which, by definition, there are no alternative capacity resources that might be displaced by the ordered generation) suggests that capacity resource treatment is well outside the Department's 202(c) authority.

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[19] A utility that takes steps subject to state authority cannot point to a Section 202(c) order as the basis for a right to recover associated costs. *See* 16 U.S.C. § 824a(c)(1) (providing for compensation or reimbursement to be paid based on just and reasonable terms for carrying out an authorized order).

In addition, the Orders fail to tie this direction to the purported emergency underlying the Orders. The Orders also fail to articulate any rational connection between this direction and the Department's limited authority to "order such temporary connections of facilities and such generation, delivery, interchange, or transmission of electric energy as in its judgment will best meet the emergency and serve the public interest." 16 U.S.C. § 824a(c)(1).

The explanation the Orders offer for this override, essentially that Schahfer and Culley 2 cannot be capacity resources because the orders do not deem them capacity resources, is clearly circular. As a result, the true reasoning behind this provision remains unclear—but its clear effect is to prevent MISO from considering the continued existence of Schahfer or Culley 2 as it works to ensure resource adequacy across its footprint. MISO's tariff defines a "capacity resource" as any of several types of resources "that are available to meet demand," and its definition of "Planning Resource" makes clear that generators like Schahfer and Culley 2 must be a Capacity Resource in order to satisfy a region's Reserve Margin Requirement. MISO Tariff Sec. 1.C, 1.P (Definitions). The Tariff also establishes clear procedures for calculating capacity contribution from all resources. *Id*. at Sec. 69A.4–69A.4.5; Schedule 53, Seasonal Accredited Capacity Calculation; Schedule 53A, Extended Seasonal Accredited Capacity Calculation. Thus, the Orders' elimination of capacity treatment for Schahfer and Culley 2 prevents MISO from following its own tariff in the wake of Schahfer and Culley's 2 continued operation and what will presumably be indefinitely renewed 202(c) orders to force Schahfer and Culley [20] to remain operational. *See* Exhibit 124, U.S. Department of Energy's November 18, 2025 Emergency Order No. 202-25-9 (issuing a third 90-day 202(c) order forcing the J.H. Campbell Power Plant to remain online); Exhibit 131, U.S. Department of Energy's November 25, 2025 Emergency Order No. 202-25-10 (issuing a third 90-day 202(c) order forcing the Eddystone Generating Station to remain online).

The Department does not have authority under Section 202(c) to govern ratemaking matters. Under Section 202(c), "the Commission may prescribe by

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[20] PIOs recognize that the MISO tariff would likely allow Schahfer Unit 18 to not be considered a capacity resource given the extensive repairs needed to return the unit to operation. *See infra* section V.B.2 (discussing the extensive repairs needed to return Schahfer Unit 18 to service); MISO Tariff, Module D, Sec. 64.1.1.xi (describing how units expected to be on outage for more than 31 days in a planning season can decline to participate in the Planning Auction). Regardless, however, the capacity eligibility of Schahfer and Culley 2 should be determined pursuant to the MISO tariff.

supplemental order such terms as it finds to be just and reasonable." *Id.* The Department of Energy Organization Act transferred authorities of the Federal Power Commission to the Department, except as provided in 42 U.S.C. chapter 84, subchapter IV. 42 U.S.C. § 7151(b). And that subchapter transfers to and vests in the Federal Energy Regulatory Commission "the establishment, review, and enforcement of rates and charges for the transmission or sale of electric energy." 42 U.S.C. § 7172(a). The capacity treatment of Culley 2 and Schahfer are one such rate matter left exclusively to FERC.

The Orders thus represent a significant and improper intrusion into FERC's authority to ensure that RTOs like MISO justly and reasonably ensure resource adequacy in their footprint. In particular, the Orders undermine years of FERC's regulatory oversight of MISO's resource adequacy construct, as codified in MISO's FERC-approved tariff. It is within FERC's purview under Section 205 of the Federal Power Act to provide that oversight, 16 U.S.C. Sec. 824d; and it is within MISO's purview to apply its own tariff in the first instance and decide whether generators, including Schahfer and Culley 2, should qualify as a "Capacity Resource" within MISO's FERC-approved resource adequacy construct. 18 C.F.R. § 35.1(e) ("No public utility shall . . . impose any classification, practice, rule, [or] regulation . . . which is different from that provided in a rate schedule required to be on file with this Commission unless otherwise specifically provided by order of the Commission for *good cause shown*." (emphasis added)).

The Department's intrusion into the oversight relationship between FERC and the RTOs also runs afoul of the filed rate doctrine, which holds that "no change shall be made [in] any [approved] . . . rate, charge, classification, or service, or in any rule, regulation, or contract relating thereto, except after sixty days' notice to the Commission and to the public" in another filing with FERC. 16 U.S.C. § 824d(d); *Okla. Gas & Elec. Co. v. FERC*, 11 F.4th 821, 829 (D.C. Cir. 2021). Interference in MISO's capacity accreditation procedures effectuates a *de facto* change to its tariff, without the legally required notice. And more generally, "Congress rejected a pervasive regulatory scheme for controlling the interstate distribution of power in favor of voluntary commercial relationships. . . . governed in the first instance by business judgment and not regulatory coercion." *Otter Tail Power*, 410 U.S. at 374. The Department's interference here in the core operational procedures of MISO's resource adequacy construct improperly upends that relationship.

More broadly, the result of the Orders not allowing MISO to include Schahfer or Culley 2 in its resource adequacy planning will be MISO securing resources it determines will adequately maintain grid security without Schahfer and Culley 2, pursuant to its FERC-approved tariff. The Orders provide no evidence that MISO cannot be trusted to ensure resource adequacy, so a Department determination that

MISO cannot be trusted would be arbitrary and capricious. It would also conflict with the Department's heavy reliance on MISO's statements and studies in support of its assertion that the region faces an emergency in the first place. Conversely, if the Department lacks the confidence that its own dire predictions that the system does not have enough resources will come true, then it is well short of the confidence necessary for an emergency declaration under Section 202(c).

If left unchecked, this provision could impose completely avoidable cost increases on Indiana and MISO ratepayers. During the pendency of these (unlawful) Orders, the principal effect of this provision will be to remove Schahfer and Culley 2's ability to provide replacement capacity in the event one of the resources that cleared the auction suffers a catastrophic outage or is otherwise suspended, retired, or shut down for more than 31 days in a season. Ex. 134 at 16 (MISO Manual on Resource Adequacy); *see* Ex. 119 (MISO, ZRC Replacement Guidance). Eliminating this compensation pathway will increase the financial cost of the Orders by removing a potential income stream that might have offset Schahfer and Culley 2's extremely high operational costs, and by forcing any other MISO zone that is impacted by an unexpected plant closure to look for potentially more expensive alternatives for replacement capacity.

Additionally, this provision will have an outsized impact in April 2026; this is the very month MISO is conducting its 2026–2027 Planning Auction. Schahfer and Culley 2's exclusion from the list of facilities that might offer capacity will ensure that Indiana ratepayers and MISO ratepayers writ large likely will be forced to pay for Schahfer and Culley 2's continued operation without any countervailing benefits: they will miss out on a major revenue stream that would have reduced Schahfer and Culley 2's operating losses, and, by operation of MISO's sloped demand curve in the Planning Auction which pays more for capacity the scarcer it is, consumers will end up paying a higher premium for any capacity their utilities secure from the Planning Auction.

In short, including this provision is yet another way in which the Department has misapplied the statute: its inclusion only further ensures that Schahfer and Culley 2's principal impact will not be plugging a gap but rather sabotaging MISO's resource planning process and heightening cost burdens in a manner that does not serve the public interest.

D. The Orders Fail to Provide the Conditions Required Under Section 202(c) to Lessen Conflicts with Environmental Standards and Minimize Environmental Harm.

Where an order "may result in a conflict with a requirement of any Federal, State, or local environmental law or regulation, Section 202(c) imposes several

requirements. 16 U.S.C. § 824a(c). The Department must "ensure" that the order "requires generation, delivery, interchange, or transmission of electric energy only during hours necessary to meet the emergency and serve the public interest." Id. § 824a(c)(2). The Department must also "ensure," "to the maximum extent practicable," that the order "is consistent with any applicable Federal, State or local environmental law or regulation." *Id.* Additionally, the Department must ensure that the order minimizes any adverse environmental impacts, regardless of the facility's compliance (or non-compliance) with environmental standards. *See id.* The Orders violate these statutory obligations.

1. *Legal Framework: Section 202(c) Further Limits the Department's Authority and Mandates Affirmative Steps to Maximize Environmental Compliance and Minimize Environmental Harm Where the Order "May Result in a Conflict" with a Federal, State, or Local Environmental Law or Regulation.*

The Federal Power Act obligates the Department to include precautions in a Section 202(c) order where the order "may result in a conflict" with environmental laws or regulations. This is a forward-looking inquiry with a low threshold.[21]

The word "may" in this context denotes a mere possibility, not a certainty. This is especially apparent when matched against the term "shall" used in Section 202(c)(2) and the other provisions added to Section 202(c) at the same time. *See* Fixing America's Surface Transportation Act of 2015, Pub. L. No. 114-94, 129 Stat. 1312 § 61002 (codified at 16 U.S.C. § 824a). Congress' use of the two disparate terms must be given effect. *See, e.g.*, *Kingdomware Techs., Inc. v. United States*, 579 U.S. 162, 172 (2016) (discussing significance of the words "may" and "shall" in the same statutory provision).

Moreover, the consequences need not be "noncompliance" or "violation" of environmental law, both of which are terms Congress also used in 2015 adding other provisions to Section 202(c). A potential "conflict" suffices. *Cf. Crosby v. Nat'l Foreign Trade Council*, 530 U.S. 363, 372–73 (2000) (explaining that courts find "conflict" in the preemption context where, for instance, a law or order "stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress"). Taken together, anytime a Department order creates circumstances that might obstruct the accomplishment or execution of environmental laws or regulations, Section 202(c)(2) imposes duties on the Department to maximize compliance with the law and minimize adverse environmental effects.

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[21] If actual noncompliance with environmental laws and regulations occurs to carry out the order, the statute provides a safe harbor. 16 U.S.C. § 824a(c)(3).

Congress adopted the requirements of Section 202(c)(2) to address environmental issues arising in response to emergencies on the grid. Congress was well aware of environmental issues stemming from 202(c) orders when it imposed the requirements in Section 202(c)(2). *See, e.g.*, Rolsma, 57 Conn. L. Rev. at 807–09 (discussing prior incidents of tension between environmental requirements and responses to emergencies on the grid, and congressional hearings addressing the matter as part of the passage of Section 202(c)(2)). Congress struck a reasonable balance requiring that environmental concerns not be left by the wayside while the Department responds to actual emergencies. Rather than requiring the Department to engage in a probing review of environmental laws and permits at all levels of our federalist system before acting, Congress set a low threshold for imposition of the mandatory Section 202(c)(2) duties to minimize conflicts with environmental laws and environmental harms flowing from a Section 202(c) order.

2. The Orders May Result in a Conflict with a Federal, State, or Local Environmental Law or Regulation.

Here, the Department implicitly acknowledges the possible conflicts. The Orders are limited to a 90-day duration. Ex. 158 at 9 (March Schahfer Order); Ex. 159 at 9 (March Culley Order). That temporal limitation exists for a 202(c) order that may result in a conflict with environmental requirements. 16 U.S.C. § 824a(c)(4).

Moreover, the evidence shows that the Orders may result in conflicts with environmental requirements. The Schahfer generating plant is subject to the Best Technology Available for Minimizing Adverse Environmental Impact ("BTA") standards under the National Pollutant Discharge Elimination System ("NPDES"). Specifically, 40 C.F.R. § 125.94 requires that NIPSCO use best technology available to minimize impingement mortality associated with water cooling systems in the Schahfer units. The Units each feature a closed-cycle cooling via a single multi-cell mechanical draft cooling tower. Ex. 24 at 55 (Schahfer 2020 NPDES Permit). The Indiana Department of Environmental Management ("IDEM") approved Schahfer's cooling systems as meeting the BTA standard, but stated that: "Primary in this entrainment BTA determination is that the facility will cease operations no later than December 31, 2022 and the permittee does have closed-cycle cooling via a single multi-cell mechanical draft cooling tower on each unit which has allowed the permittee to achieve substantial reductions in water usage." *Id.* at 55. In other words, IDEM approved Schahfer's NPDES permit on the flawed assumption that Units 17 and 18 would retire as of December 31, 2022. *Id.* at 1. The NPDES permit expired September 20, 2025. Ex. 24 at 1 (Schahfer 2020 NPDES Permit). As NIPSCO noted, in order to operate Schahfer Units 17 and 18 "for one day beyond 2025," the Schahfer NPDES permit would require NIPSCO "to install a wastewater treatment system and convert the [retired] Unit 14 and 15 bottom ash handling

system" so that it could be used on Units 17 and 18. Ex. 132 at PDF p. 16 (NIPSCO Rate Case Discovery Responses).

The Order also may result in a conflict with the federal coal combustion residuals ("CCR") Rule. In 2015 and in subsequent rulemakings, the EPA promulgated rules pursuant to the Resource Conservation and Recovery Act ("RCRA") which created standards for legacy surface impoundments of CCR. EPA provided an alternative compliance mechanism that extended the deadline for owners and operators to complete closure of their unlined CCR surface impoundments larger than 40 acres until October 17, 2028 if the coal-fired boiler associated with the generator would permanently retire by that same date. 40 C.F.R. § 257.103(f)(2). In its latest compliance filings for the rule, NIPSCO explained that if it ceasesd combustion of coal at Schahfer by December 31, 2025 as expected, it would be able to close its CCR impoundment (the Waste Disposal Area) by September 17, 2028, a month ahead of EPA's deadline. Ex. 25A at 6 (Schahfer CCR Part A Demonstration Addendum, part 1). But the Department's December Schahfer Order in conjunction with the current March Schahfer Order have prevented that closure, which, given the long timeline of closing the Waste Disposal Area, would cause Schahfer to breach the deadline of current federal law.

The March Culley Order also may result in a conflict with environmental laws and regulations. Culley 2 shares pollution control equipment with Culley 3, another generating unit at Culley which is not subject to an order from the Department. Culley 3 contains a flue gas desulfurization ("FGD") system which serves both units. Ex. 26 at 7 (Culley 2025 Air Permit Modification). Culley Units 3 and 2 also share equipment critical to meeting the units' NPDES permit requirements. Ex. 56 at 14 (Bradford Coal Inventory Testimony). The result of this setup is that Culley 3 outages can force Culley 2 offline for environmental compliance reasons. Culley 3 saw sustained outages in 2025 that, due to shared pollution control systems, also forced Culley 2 offline. *See* Ex. 27 at 3 (CenterPoint Fuel Cost Order) (describing how "due to the environmental parameters associated with the Culley Unit 3 outage, Culley Unit 2's availability will be limited until Unit 3 comes back online"). As a result, even if Culley 2 is operational, any downtime needed to service Culley 3 may result in a conflict with environmental requirements.

Independently, running Culley 2 may result in clear conflict with the plant's NPDES permit. The permit mandates that "[b]eginning December 31, 2025, there shall be no discharge of bottom ash transport water from Unit 2." Ex. 28 at 6 (Culley 2024 NPDES Permit).

The Orders may result in additional conflicts with air pollution laws and regulations. For example, EPA has approved Indiana's regional haze state

implementation plan revision. Ex. 57 (2026 EPA IN Haze SIP Approval). Indiana conducted its regional haze state implementation analysis under the assumption that owners of electric generating unit sources would "continue to shutdown units, convert to natural gas, and rely more on renewable energy." Ex. 69 at 2 (IN Haze SIP Responses to Public Comments); *see also* 90 Fed. Reg. 25,951 (finding Indiana's choice not to apply the four factor test to all of the state's EGUs reasonable because given "historical data showing relatively consistent or declining NO_X and SO_2 annual emissions and emission rates, as well as 2028 projections, the overall emissions are not expected to increase in the future"). The Department's Orders prevent the retirement of Schahfer and Culley 2 and affect how the Plants are dispatched. *See* Ex. 158 at 8–9 (March Schahfer Order); Ex. 159 at 8–9 (March Culley Order). As such, the Orders may result in a conflict with environmental requirements.

3. The Orders Lack the Conditions Required by Section 202(c).

i. The Orders' Terms Fail to Require Generation Only During Hours Necessary to Meet the Purported Emergency.

The Orders directly contradict the Department's obligation to require generation "only during hours necessary to meet the emergency." 16 U.S.C. § 824a(c)(2). The Orders instead state: "For the duration of this Order, MISO is directed to take every step to employ *economic* dispatch" of the Schahfer and Culley 2 Plants "to *minimize cost* to ratepayers." Ex. 1 at 5 (December Schahfer Order) (emphasis added); Ex. 2 at 5 (December Culley Order) (emphasis added). The "emergency" nominally described by the Orders is the potential "loss of power to homes and businesses in the areas that may be affected by curtailments or power outages." Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 5 (December Culley Order). Even if the Department had substantiated that emergency (which it has not), the Federal Power Act would allow the Department to compel generation only when needed to prevent such involuntary curtailments or outages. 16 U.S.C. 824a(c)(2).[22] "Economic

[22] *See, e.g.,* Ex. 6 at 9 (DOE Order No. 202-17-4 Summary of Findings) ("authorizing operation of" units subject to emergency order "only when called upon . . . for reliability purposes," according to "dispatch methodology" approved by the Department); *see also* Ex. 160 at 7 (Department Order No. 202-26-01) (authorizing specified entities "to direct [certain] backup generation resources . . . to operate as a last resort before declaring an Energy Emergency Alert (EEA) 3 (i.e., before firm load interruption) or during an EEA 3"); Ex. 161 at 7 (Department Order No. 202-26-01A) (authorizing specified entities "to direct [certain] backup generation

dispatch," in sharp contrast, requires "the lowest-cost resources [to] run first," in pursuit of "the lowest-cost energy available." *City of New Orleans v. FERC,* 67 F.3d 947, 948–49 (D.C. Cir. 1995)*; see also Fla. Power & Light Co. v. FERC,* 88 F.3d 1239, 1241 (D.C. Cir. 1996) (noting distinction between economic dispatch and reserve capacity rules).

By instructing MISO to employ economic dispatch, the Orders' terms permit (indeed, direct) operation of Schahfer 17, Schahfer 18, and Culley 2 even when other—albeit potentially higher cost—resources are available that would prevent any "curtailments or power outages"—that is, the claimed emergency. Ex. 158 at 8 (March Schahfer Order); Ex. 159 at 8 (March Culley Order). The Orders' further instructions—limiting "dispatched units to the times and within the parameters as determined by MISO pursuant to paragraph A," Ex. 158 at 9 (March Schahfer Order); Ex. 159 at 9 (March Culley Order)—just repeats that initial instruction to "employ economic dispatch," without any further limitation.[23]

ii. The Orders Fail to Ensure Maximum Practicable Consistency with Environmental Rules and to Minimize Adverse Environmental Impacts.

The Orders further fail to "ensure" that Schahfer and Culley 2 operate, "to the maximum extent practicable," in conformity with applicable environmental rules. 16 U.S.C. § 824(c)(2). The Orders paraphrase the statutory text—that "operation of the [affected units] must comply with applicable environmental requirements . . . to the maximum extent feasible," but fail to specify *who* bears that responsibility or *what* such operation entails. Ex. 158 at 9 (March Schahfer Order); Ex. 159 at 9 (March Culley Order).[24] The direction to "comply . . . to the maximum extent

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resources . . . to operate after ERCOT deploys all available market services, except for frequency responsive services, before declaring an Energy Emergency Alert (EEA) 3 (i.e., before firm load interruption) or during an EEA 3"); cf. Ex. 162 at 3 (Department Order No. 202-26-03) ("In the event that ISO-NE determines that generation from the Specified Resources is necessary to meet the electricity demand that ISO-NE anticipates in its service territory, I direct ISO-NE to dispatch such unit or units and to order their operation only as needed to maintain reliability.").

[23] That direction further fails to conform to the statute's command to compel only the generation that will "best meet the emergency." 16 U.S.C. § 824(c)(1).

[24] Unlike the previous orders for Schahfer and Culley 2, *see* Ex. 1 at 5 (December Schahfer Order); *see also* Ex. 2 at 5 (December Culley Order), the Orders do not expressly state that "This Order does not provide relief from any obligation to pay

feasible" is, as a result, wholly unenforceable; the Orders provide no basis for the Department, or anyone else, to determine whether each plant is in fact complying or who might face the consequences of any failure to do so. *See* Ex. 9 at 5–7 (DOE Order No. 202-22-4) (requiring, *inter alia,* reporting of "number and actual hours each day" of operation "in excess of permit limits or conditions," and information describing how generators complied with environmental requirements to maximum extent feasible). Consequently, the Orders do not meet the Department's statutory obligation to "*ensure*" the maximum feasible consistency with applicable environmental standards—an obligation that requires the Department to offer some discrete guidance as to the Plants' operations, rather than merely parroting the statutory text. 16 U.S.C. § 824a(c)(2) (emphasis added). In addition, the Orders fail to "minimize[] any adverse environmental impacts." 16 U.S.C. § 824a(c)(2). That mandate is textually and substantively distinct from the Department's (also unfulfilled) obligation to ensure maximum practicable compliance with environmental standards. *Id.* The Orders claim to minimize environmental impacts by "limit[ing] operation of dispatched units to the times and within the parameters as determined by MISO, pursuant" to the Orders' "paragraph A." Ex. 158 at 9 (March Schahfer Order); Ex. 159 at 9 (March Culley Order). But in both Orders, paragraph A contains only a command that MISO "take all measures necessary to ensure" that the Schahfer and Culley 2 Plants are "available to operate" and "employ economic dispatch . . . to minimize cost to ratepayers," and requires a directive that NIPSCO and CenterPoint Indiana comply with MISO's orders implementing the Orders' commands.[25] *Id.* An instruction minimizing ratepayer costs and demanding availability has no rational relationship to a requirement to

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fees or purchase offsets or allowances for emissions that occur during the emergency condition or to use other geographic or temporal flexibilities available to generators." *See* Ex. 158 at 9 (March Schahfer Order); *see also* Ex. 159 at 9 (March Culley Order). The Orders do not, however, state that they provide such relief, that any such relief is necessary to meet the emergency, or otherwise that the agency is changing its position. There is, therefore, no reason to believe that the agency is changing its position.

[25] To the extent the Orders allow MISO to independently devise conditions limiting environmental impacts, that mere possibility, first, cannot satisfy the Department's own statutory obligation to "ensure" that its "order" minimizes environmental impacts (and limits hours to those necessary to meet the emergency, and mandates the maximum practicable compliance). 16 U.S.C. § 824a(c)(2). And even if it could, the Orders require MISO to employ "economic dispatch" and "ensure" that Schahfer and Culley are "available to operate"—directions that are flatly inconsistent with the statute's requirements to minimize the Plants' environmental impacts.

minimize environmental impacts. The Orders contain no requirement similar to the requirements recommended by PIOs' expert engineer Mr. Powers: "DOE should require verification of the good working order of the Schahfer 17 and 18 air emission control systems before authorizing Schahfer 17 and 18 to operate under extreme demand conditions" or a similar recommendation for Culley 2. Ex. 4 at 19–20, 22 (Powers January Decl.).

Additionally, the Orders include no measures that would mitigate impacts when compliance with environmental standards proves impracticable—measures that have been routinely included in past orders. *See, e.g.*, Ex. 6 at 9 (DOE Order No. 202-17-4 Summary of Findings) (permitting non-compliant operation only during specified hours, and requiring exhaustion of "all reasonably and practically available resources," including demand response and identified behind-the-meter generation resources selected to minimize an increase in emissions); Ex. 9 at 7 (DOE Order No. 202-22-4) (requiring "reasonable measures to inform affected communities" of non-compliant operations). At a minimum the statute requires the Department to include sufficiently detailed reporting obligations to ascertain what impacts result from emergency operations; without such reporting, the Department has no ability to "ensure" that adverse impacts are minimized. *See, e.g.*, Ex. 110 at 5 (DOE Order No. 202-24-1) (requiring detailed data on emissions of pollutants). The Orders here instead only require "such additional information" as the Department, in the future, may (or may not) "request[] . . . from time to time." Ex. 1 at 5 (December Schahfer Order); Ex. 2 at 5 (December Culley Order). That possibility of future, unspecified inquiry cannot satisfy the statute's demand that the Department "ensure" that its Orders minimize environmental impacts. 16 U.S.C. § 824a(c)(2). As one example of mitigation measures, PIOs' expert engineer, Mr. Powers, suggested that if permit limits for PM, NO_x, or SO_2 are exceeded (as measured on the onsite monitors) during operation of Schahfer 17 and 18 or of Culley 2, the respective units should be shut down. Ex. 4 at 20, 22 (Powers January Decl.). Declining to include such a measure, particularly when there is no apparent risk of loss of power to homes and businesses in the area absent power from Schahfer and Culley 2, does not conform with the requirement of Section 202(c)(2) that the Department order generation only during hours needed to meet the claimed emergency and best serve the public interest.

iii. There is No Indication That the Department Has Conducted the Consultation Required by Section 202(c)(4)(B) or Adopted Conditions Resulting From Consultation.

Finally, there is no indication in the Orders that the Department has, as Section 202(c)(4)(B) requires, "consult[ed] with the primary Federal agency with expertise in the environmental interest protected" by the laws with which the Orders may

conflict. 16 U.S.C. § 824a(c)(4)(B). The Orders serve as a renewal or re-issuance of the Department's December Schahfer Order and December Culley Order; its claimed basis is that '[t]he emergency conditions that necessitated the issuance of [the prior order] continue." Ex. 158 at 3 (March Schahfer Order); Ex. 159 at 3 (March Culley Order). But the Department has provided no evidence of consultation with the Environmental Protection Agency (or any other agency with expertise in Schahfer and Culley 2's air and water pollution). Cf. Ex. 163 at 2 (Department Order No. 202-22-2 Amendment No. 1) (stating that "the Department consulted with EPA… and EPA did not request any additional conditions"); Ex. 167 at 2 (Department Order No. 202-22-1 Amendment No. 2) (same); Ex. 6 at 9–10 (DOE Order No. 202-17-4 Summary of Findings) (including EPA consultation in public record). Nor is there any evidence of "[t]he conditions, if any, submitted" by EPA (or any other agency) following consultation, or "an explanation of [the Department's] determination" that such conditions "would prevent the [Orders] from adequately addressing the emergency"—material that Section 202(c)(4)(B) requires the Department to make "available to the public." 16 U.S.C. § 824a(c)(4)(B); *see* Ex. 164 at 1 (Starfield Email to Hoffman) (made public by Department). If the Department has failed to consult and procure the required conditions, it has violated the statute. *Id*. If it has received and declined such conditions, but refused to disclose them or an explanation of why the Department does not believe any such conditions are necessary, that too violates the law. *Id*.

VI. REQUEST FOR STAY

PIOs further move the Department for a stay of the Orders until the conclusion of judicial review. 18 C.F.R. § 385.212.[26] The Department has the authority to issue such a stay under the Administrative Procedure Act and should do so where "justice so requires." 5 U.S.C. § 705. In deciding whether to grant a request for stay, agencies consider (1) whether the party requesting the stay will suffer irreparable injury without a stay; (2) whether issuing a stay may substantially harm other parties; and (3) whether a stay is in the public interest. *Nken v. Holder*, 556 U.S. 418, 434, 436 (2010); *Ohio v. EPA*, 603 U.S. 279, 291 (2024); *see, e.g.*, *Midcontinent Indep. Sys. Operator, Inc.,* 184 FERC ¶ 61,020, at P 41 (2023); *ISO Eng. Inc.*, 178 FERC ¶ 61,063, at P 13 (2022), *rev'd on other grounds sub nom. In re NTE Conn., LLC*, 26 F.4th 980, 987–88 (D.C. Cir. 2022).

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[26] Pursuant to FPA Section 313(c) and Rule 713(e) of the applicable rules, the filing of a request for rehearing does not automatically stay a Department order. 16 U.S.C. § 825*l*(c); 18 C.F.R. § 385.713(e).

Injuries under this standard must be actual, certain, imminent, and beyond remediation. *Mexichem Specialty Resins, Inc. v. EPA*, 787 F.3d 544, 555 (D.C. Cir. 2015); *Wis. Gas Co. v. FERC*, 758 F.2d 669, 674 (D.C. Cir. 1985); *ANR Pipeline Co.*, 91 FERC ¶ 61,252, at 61,887 (2000); *City of Tacoma*, 89 FERC ¶ 61,273, at 61,795 (1999) (recognizing that, absent a stay, options for "meaningful judicial review would be effectively foreclosed"). Financial injury is only irreparable where no "adequate compensatory or other corrective relief will be available at a later date, in the ordinary course of litigation." *Wis. Gas Co.*, 758 F.2d at 674 (*quoting Va. Petroleum Jobbers Ass'n v. Fed. Power Comm'n*, 259 F.2d 921, 925 (D.C. Cir. 1958)); *see also In re NTE Conn., LLC*, 26 F.4th 980, 991 (D.C. Cir. 2022). Environmental injury, however, "can seldom be adequately remedied by money damages and is often permanent or at least of long duration, *i.e.*, irreparable. If such injury is sufficiently likely, therefore, the balance of harms will usually favor the issuance of an injunction to protect the environment." *Amoco Prod. Co. v. Vill. of Gambell*, 480 U.S. 531, 545 (1987).

Under those standards, a stay of the Orders is appropriate.

A. Intervenors Will Suffer Irreparable Harm Without a Stay of the Orders.

A stay is necessary to protect PIOs, their members, and the public from harm from continued coal-fired power operations caused by the Department's Orders.

As noted extensively *supra* sec. IV.C.3.i.c and ii.c, Schahfer and Culley 2 emit health- and environment-harming air pollutants like nitrogen oxides, sulfur dioxide, particulate matter, and volatile organic compounds. New coal combustion residuals will continue to pollute groundwater.

The health and environmental harms from this pollution flow directly from the Department's Orders and are actual, specific, and imminent, and can be deadly. They will affect the lives and well-being of PIOs and their members. The stark public health stakes of PIOs' request for stay require the Department to pause implementation of its Orders until a court reviews their validity.

Additionally, without a stay, the Orders create other injuries too. The Orders needlessly force NIPSCO and CenterPoint Indiana to continue to divert attention and investment dollars away from planned reuse of the Schahfer and Culley 2 interconnection rights for other generation projects. In doing so, the Department denies PIOs' members the benefits of Indiana's energy policies which are designed to benefit them and the public. In addition to forcing ratepayers to pay for the availability and dispatch of uneconomic, unreliable, and obsolete resources that the State, stakeholders, and owners want to close, *see supra* sec. IV.C, the Department's Orders jeopardize the diversification of generating resources the Department itself

has said increases grid reliability. Ex. 142 (Dep't of Energy, *Energy Reliability and Resilience*). There is no clear recourse to remedy those injuries either.

B. A Stay Would Not Result in Harm to Any Other Interested Parties.

No other interested parties would be harmed by a stay. The issuance of a stay would not harm end-use electricity consumers because the lack of an actual emergency means that a stay would not disrupt the provision of electricity. *See supra* secs. IV.B–.C, V.A. Furthermore, because MISO, the Indiana Commission, NIPSCO, and CenterPoint Indiana have already planned for Schahfer and Culley 2's closures and continue to plan for resource adequacy, a stay would only have the effect of relieving them of the administrative, compliance, and planning burdens imposed by the Orders. On the balancing of equities, there is therefore no meaningful countervailing harm that would follow from a stay.

C. A Stay Is in the Public Interest Given the Significant Evidence Demonstrating There is No Factual or Legal Support for These Orders, and Given the Harm they Produce to the Broader Public.

There is no public interest served by the Orders, and a stay will only benefit the public. First, the Orders exceed the Department's authority; the Orders have provided no reasonable grounds to substantiate any near-term or imminent shortfall in electricity supply that would justify Schahfer and Culley 2's continued operation. *See League of Women Voters v. Newby*, 838 F.3d 1, 12 (D.C. Cir. 2016) (noting "there is a substantial public interest 'in having governmental agencies abide by the federal laws that govern their existence and operations'") (quoting *Washington v. Reno*, 35 F.3d 1093, 1103 (6th Cir. 1994)). Second, the Orders override Indiana's exercise of its "authority to choose [its] preferred mix of energy generation resources." *Citizens Action*, 125 F.4th at 239. By doing so, the Orders unlawfully intrude into states' reserved authority over in-state "facilities used for the generation of electric energy." 16 U.S.C. §824(b)(1); *see Pac. Gas & Elec.*, 461 U. S. at 205 ("Need for new power facilities, their economic feasibility, and rates and services, are areas that have been characteristically governed by the States."); *see also Hughes*, 578 U.S. at 154 (cleaned up) ("Under the [Federal Power Act], FERC has exclusive authority to regulate the sale of electric energy at wholesale in interstate commerce. . . . But the law places beyond FERC's power, and leaves to the States alone, the regulation of any other sale—most notably, any retail sale—of electricity."). And third, a stay would protect the broader public—beyond PIOs and their members—from the onerous costs, and dangerous pollution, produced by unnecessary operation of the Schahfer and Culley 2 Plants.

VII. CONCLUSION

For the reasons set forth above, the undersigned Public Interest Organizations respectfully request that the Department grant intervention with respect to each Order; grant rehearing and rescind the Orders (and any renewals of the Orders); and stay the Orders.

Filed on April 22, 2026.

Submitted by:

[*Continued to next page for signatures*.]

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Attachment: Index of Exhibits

Index of Exhibits

No.	Exhibit Name	Document Name	URL
1	December Schahfer Order	U.S. Department of Energy's December 23, 2025 Emergency Order No. 202-25-12	https://www.energy.gov/documents/order-number-202-25-12-schahfer
2	December Culley Order	U.S. Department of Energy's December 23, 2025 Emergency Order No. 202-25-13	https://www.energy.gov/documents/order-number-202-25-13-culley
3	EFG Report	Carlos Peña and Anna Sommer of Energy Futures Group, Reliability and Capacity Assessment of F.B. Culley 2 and R.M. Schahfer 17 and 18, January 21, 2026	
4	Powers January Declaration	Schahfer 17 & 18 and Culley 2 Declaration of Bill Powers, P.E., January 21, 2026	
5	Synapse Report	Report of Lucy Metz and Devi Glick of Synapse Energy Economics on cost of continued operation of Culley Unit 2 and Schahfer Units 17–18 under Federal Power Act orders, January 21, 2026	
6	DOE Order No. 202-17-4 Summary of Findings	Summary of Findings DOE Order No. 202-17-4 (Sep. 14, 2017)	https://www.energy.gov/sites/default/files/2017/09/f36/Order%20202-17-4%20Summary%20of%20Findings.pdf
7	DOE Order No. 202-02-1	DOE, Order No. 202-02-1 (Aug. 16, 2002)	https://www.energy.gov/sites/default/files/202%28c%29%20order%20202-02-1%20August%2016%2C%202002%20-%20CSC.pdf

No.	Exhibit Name	Document Name	URL
8	Cooke Email to Alle-Murphy	Email from Lot Cooke, DOE to Linda Alle-Murphy Re: Rehearing procedures for DOE Order No. 202-05-3	https://www.energy.gov/oe/articles/question-and-answer-procedural-questions-application-rehearing-order-no-202-05-02?nrg_redirect=397676
9	DOE Order No. 202-22-4	DOE, Order No. 202-22-4 (Dec. 24, 2022)	https://www.energy.gov/sites/default/files/2022-12/PJM%20202%28c%29%20Order.pdf
10	Grid Strategies June Report	Michael Goggin, *A Review of DOE's 202(c) Order for the Campbell Coal Plant* (June 18, 2025)	
11	NIPSCO 2025 Planning Reserve Margin Report	NIPSCO 2025 Annual Report in Compliance With Ind. Code § 8-1-8.5-13	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/1a22a22e-cc26-f011-8c4e-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=46233_NIPSCO_Submission%20of%20Redacted%20Report_05012025.pdf
12	CenterPoint 2025 Planning Reserve Margin Report	CenterPoint Energy Indiana South 2025 HEA 1520 Report Pursuant to I.C. § 8-1-8.5-13 (May 23, 2025)	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/e865df14-0c38-f011-8c4e-001dd80846ac/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=46236_CEIS_Notice%20of%20Submission%20of%20HEA%201520%20Report_052325.pdf
13	NIPSCO Performance Metric Collaborative Update	Northern Indiana Public Service Company LLC's Annual Performance Metric Collaborative Update, IURC Cause No. 44688, July 1, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/9847a67d-a756-f011-877b-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=44688_NIPSCO_Compliance%20Filing%20-%20PMC%20Update_07012025.pdf
14	Saffran Q1 2025 Outage Testimony	Direct Testimony of David Saffran on behalf of Northern Indiana Public Service	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/0f58f29b-f637-f011-8c4e-001dd80846ac/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC147_NIPSCO

No.	Exhibit Name	Document Name	URL
		Company LLC, IURC Cause No. 38706 FAC 147, May 23, 2025	_Petitioners%20Exhibit%204%20(Saffran)_05232025.pdf
15	Saffran Q2 2025 Outage Testimony	Direct Testimony of David Saffran on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 148, Aug. 18, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/635d1149-747c-f011-b4cc-001dd80846ac/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC148_NIPSCO_Petitioners%20Exhibit%204%20(Saffran)_08182025.pdf
16	Saffran Q3 2025 Outage Testimony	Direct Testimony of David Saffran on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 149, Nov. 20, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/e268e77b-52c6-f011-bbd3-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC149_NIPSCO_Petitioners%20Exhibit%204%20(Saffran)_11202025.pdf
17	DOE Order No. 202-20-2	Department of Energy Order No. 202-20-2 (Sept. 6. 2020)	https://www.energy.gov/oe/articles/federal-power-act-section-202c-caiso-september-2020?nrg_redirect=454296
18	Wagner November Testimony	Direct Testimony of John A. Wagner on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 149, Nov. 20, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/08174aa0-52c6-f011-bbd3-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC149_NIPSCO_Petitioners%20Exhibit%203%20(Wagner)_11202025.pdf
19	NIPSCO CPCN Discovery Responses	IURC Cause No. 45947, NIPSCO-CAC Joint Exhibit 6 (NIPSCO's Public Responses to CAC Data Requests), July 11, 2024	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/98b5e199-824b-ef11-a316-001dd8073c71/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45947%20NIPSCO.CAC%20Joint%20Exhibit%20No.%206.pdf

No.	Exhibit Name	Document Name	URL
20	IURC Schahfer Gas Plant Order	Indiana Utility Regulatory Commission Order in Cause No. 45947 dated October 16, 2024	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/8d902453-cd8b-ef11-ac21-001dd80bd98a/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_45947_101624.pdf
21	CenterPoint Indiana 2025 IRP	CenterPoint Energy Indiana South 2025 Integrated Resource Plan	https://www.in.gov/iurc/files/CEIS_2025_IRP_Volume_1_of_2.pdf
22	CenterPoint 2024 Performance Report	CenterPoint Energy Indiana South 2024 Electric Performance Report	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/ec855054-7c53-f011-877a-001dd80846ac/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45564_CEI%20South_Electric%20Performance%20Report_062725.pdf
23	Wayne Games 2021 Testimony	Rebuttal Testimony of Wayne D. Games To The Direct Testimony Of Intervening Parties On Need For Resources To Replace Existing Inefficient Units, Cause No. 45501 (May 24, 2021).	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/76eb9f24-6ebd-eb11-8236-001dd802dc58/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45501_CenterPoint%20Energy%20Indiana%20South_Games%20Rebuttal%20Testimony%20Petitioners%20Exhibit%20No%203-R%20(PUBLIC)_052421.pdf
24	Schahfer 2020 NPDES Permit	Indiana Dept. of Envtl. Mgmt. Approval of Schahfer Generating Station NPDES Permit Application (Sep. 24, 2020)	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83057089&dDocName=83057294&Rendition=web&allowInterrupt=1&noSaveAs=1
25A	Schahfer CCR Part A Demonstration Addendum, part 1	NIPSCO R.M. Schahfer Generating Station: Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of	https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/ccr/r.m.-schahfer/r.m.-schahfer-generating-station-groundwater-moniitoring-and-corrective-action/rm-schahfer-generating-station-wda-part-a-addendum-2-summer-2022.pdf?sfvrsn=d2e31151_3

No.	Exhibit Name	Document Name	URL
		Coal-fired Boilers by a Date Certain – Addendum 2 (August 2022), PDF pp. 1–191	
25B	Schahfer CCR Part A Demonstration Addendum, part 2	NIPSCO R.M. Schahfer Generating Station: Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-fired Boilers by a Date Certain – Addendum 2 (August 2022), PDF pp. 192-466.	(*Same as Exhibit 25A*)
25C	Schahfer CCR Part A Demonstration Addendum, part 3	NIPSCO R.M. Schahfer Generating Station: Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-fired Boilers by a Date Certain – Addendum 2 (August 2022), PDF pp. 467-691	(*Same as Exhibit 25A*)
26	Culley 2025 Air Permit Modification	Indiana Dept. of Envtl. Management, Minor Permit Modification to Part 70 Operating Permit No. T173-43264-00001 (July 7, 2025), PDF pp. 1–191	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83826642&dDocName=83830685&Rendition=web&allowInterrupt=1&noSaveAs=1
27	CenterPoint Fuel Cost Order	IURC Order, Cause No. 38708 FAC 146, April 30, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/08b0fe52-d625-f011-998a-001dd80b1717/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_38708FAC146_043025.pdf

No.	Exhibit Name	Document Name	URL
28	Culley 2024 NPDES Permit	Indiana Dept. of Envtl. Management, Modification to NPDES Permit No. IN0002259, May 3, 2024	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83630044&dDocName=83634089&Rendition=web&allowInterrupt=1&noSaveAs=1
29	Bradford 2025 CCR Testimony	Direct Testimony of F. Shane Bradford on behalf of CenterPoint Energy Indiana South, IURC Cause No. 45052 ECA 6, May 7, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/1f3f3a58-3b2c-f011-8c4e-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45052%20ECA%206_CEI%20South_Pet.%27s%20Ex.%20No.%201_Bradford%20Direct%20Testimony%20and%20Attachment_050725%20(2).pdf
30	DOE Rehearing Procedures	U.S. Dep't of Energy, DOE 202(c) Order Rehearing Procedures (last visited June 17, 2025)	https://www.energy.gov/ceser/doe-202c-order-rehearing-procedures
31	MISO 2025–26 Auction Results	MISO, Planning Resource Auction, Results for Planning Year 2025-2026 (Apr. 2025)	https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf
32	MISO Emergency Declarations	MISO, Maximum Generation Emergency Declarations through June 2024 (Aug. 30, 2024)	https://www.oasis.oati.com/woa/docs/MISO/MISOdocs/Capacity_Emergency_Historical_Information.pdf
33	MISO Market Capacity Emergency	MISO, Market Capacity Emergency, SO-P-EOP-11-002 Rev: 23 (Oct. 15, 2025)	https://cdn.misoenergy.org/SO-P-EOP-11-002%20Rev%2023%20MISO%20Market%20Capacity%20Emergency683501.pdf
34	Ramey MISO Comments	Comments of Todd Ramey on Behalf of Midcontinent ISO, Inc. (May 28, 2025), Docket No. AD24-11-000, Accession No. 20250528-4032	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250528-4032&optimized=false&sid=4f4f3475-8309-4416-8289-2aee6d84c1a8

No.	Exhibit Name	Document Name	URL
35	Patton MISO Comments	Technical Conference Comments of David B. Patton, Ph.D., MISO Independent Market Monitor (May 28, 2025), Docket No. AD25-7-000, Accession No. 20250528-4006	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250528-4006&optimized=false&sid=2c5ac909-a7f0-47eb-9bb3-c35f89976250
36	MISO Elliott Max. Gen. Event Overview	MISO, Overview of Winter Storm Elliott December 23, Maximum Generation Event (Jan. 17, 2023)	https://cdn.misoenergy.org/20230117%20RSC%20Item%2005%20Winter%20Storm%20Elliott%20Preliminary%20Report627535.pdf
37	MISO 2025–2026 CIL/CEL Final Results	MISO, 2025-2026 PY Seasonal CIL/CEL Final Results (Oct. 24, 2024)	https://cdn.misoenergy.org/20241024%20LOLEWG%20Item%2004%20PY%202025-2026%20Final%20CIL_CEL%20Results654989.pdf
38	MISO LOLE Presentation	MISO, *LOLE 101: Probabilistic Analyses*	https://cdn.misoenergy.org/LOLE%20101%20Training624875.pdf
39	DOE Order No. 202-22-2	Department of Energy Order No. 202-22-2 (Sept. 4, 2022)	https://www.energy.gov/ceser/federal-power-act-section-202c-banc-september-2022
40	NERC 2024 Reliability Report	NERC, 2024 State of Reliability (June 2024) (excerpt)	https://www.nerc.com/pa/RAPA/PA/Performance%20Analysis%20DL/NERC_SOR_2024_Technical_Assessment.pdf
41	NERC 2025 Summer Reliability Assessment	NERC, 2025 Summer Reliability Assessment (May 2025)	https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2025.pdf

No.	Exhibit Name	Document Name	URL
42A	2019–24 NERC Summer Reliability Assessments, part 1	NERC, Summer Reliability Assessments for 2019–2024 (Compiled), PDF pp. 1–89	2019 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2019.pdf 2020 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2020.pdf 2021 Reliability Assessment: https://nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC%20SRA%202021.pdf 2022 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2022.pdf 2023 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2023.pdf 2024 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2024.pdf
42B	2019–24 NERC Summer Reliability Assessments, part 2	NERC, Summer Reliability Assessments for 2019–2024 (Compiled), PDF pp. 90–176	(*Same as Exhibit 42A*)
42C	2019–24 NERC Summer Reliability Assessments, part 3	NERC, Summer Reliability Assessments for 2019–2024 (Compiled), PDF pp. 177–264	(*Same as Exhibit 42A*)

No.	Exhibit Name	Document Name	URL
43	Winter Storm Elliott System Operations Inquiry	FERC, NERC, and Regional Entity Staff Report, Inquiry into Bulk-Power System Operations During December 2022 Winter Storm Elliott (Oct. 2023)	https://www.ferc.gov/media/winter-storm-elliott-report-inquiry-bulk-power-system-operations-during-december-2022#
44	PJM Elliott Report	PJM, *Winter Storm Elliott: Event Analysis and Recommendation Report* (July 17, 2023)	https://www.pjm.com/-/media/DotCom/library/reports-notices/special-reports/2023/20230717-winter-storm-elliott-event-analysis-and-recommendation-report.pdf?ref=blog.gridstatus.io
45	DOE Order No. 202-21-1	Department of Energy Order No. 202-21-1 (Feb. 14, 2021)	https://www.energy.gov/oe/articles/federal-power-act-section-202c-ercot-february-2021?nrg_redirect=364318
46	FERC Energy Primer	FERC, Energy Primer: A Handbook of Energy Market Basics (Dec. 2023) (excerpt)	https://www.ferc.gov/media/energy-primer-handbook-energy-market-basics
47	MISO Schedule 53 Class Averages	MISO, Planning Year 2026-2027 Preliminary Schedule 53 Class Averages	https://cdn.misoenergy.org/Initial%20Schedule%2053%20Class%20Average%20for%20PY26-27733034.pdf
48	Utility Dive, MISO begins reviewing 6.1 GW — 70% of it gas — in fast-track interconnection study (Dec. 2, 2025)	Ethan Howland, Utility Dive, MISO begins reviewing 6.1 GW — 70% of it gas — in fast-track interconnection study (Dec. 2, 2025)	https://www.utilitydive.com/news/miso-eras-fast-track-interconnection-study-gas/806747/
49	2025 Energy Innovation Dataset	Energy Innovation, dataset for Coal Power 28 Percent More	https://energyinnovation.org/report/coal-power-28-percent-more-expensive-in-2024-than-in-2021/

No.	Exhibit Name	Document Name	URL
		Expensive In 2024 Than In 2021 (June 5, 2025)	
50	2025 Energy Innovation Coal Cost Report	Energy Innovation, Coal Power 28 Percent More Expensive In 2024 Than In 2021 (June 5, 2025)	https://energyinnovation.org/wp-content/uploads/Coal-Cost-Update.pdf
51	2023 Energy Innovation Coal Cost Report	Energy Innovation, Coal Cost Crossover 3.0 (Jan. 2023)	https://energyinnovation.org/wp-content/uploads/Coal-Cost-Crossover-3.0-2.pdf
52	Department Export Authorization EA-365-C (Oct. 21, 2025)	Research Power Corp., Order No. EA365-C (Oct. 21, 2025)	https://www.energy.gov/sites/default/files/2025-11/EA-365-C%20Research%20Power%20Corporation%20-%20Export%20Authorization%20Order.pdf
53	IURC 2025 Winter Reliability Forum (December 2, 2025)	Excerpt in .MP4 format of video recording of IURC 2025 Winter Reliability Forum (December 2, 2025),beginning at 51:35 timestamp	https://www.youtube.com/watch?v=bCzALF4V45M
54	NARUC Coal Report	National Association of Regulatory Utility Commissioners, Recent Changes to U.S. Coal Plant Operations and Current Compensation Practices (Jan. 2020) (excerpt)	https://www.osti.gov/servlets/purl/1869928
55	IEA Flexibility Report	C. Henderson, International Energy Agency, Increasing the flexibility of coal-fired power plants (Sept. 2014) (excerpt)	https://usea.org/sites/default/files/092014_Increasing%20the%20flexibility%20of%20coal-fired%20power%20plants_ccc242.pdf

No.	Exhibit Name	Document Name	URL
56	Bradford Coal Inventory Testimony	Direct Testimony of F. Shane Bradford on behalf of CenterPoint Energy Indiana South, IURC Cause No. 38708 FAC 149, Nov. 17, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/54dd55d5-bbc4-f011-bbd3-001dd8084346/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38708FAC149_CEI%20South%20Electric_No%201%20Bradford%20Testimony%20and%20Attachments%20PUBLIC_111725.pdf
57	2026 EPA IN Haze SIP Approval	Air Plan Approval; Indiana; Regional Haze Plan for the Second Implementation Period	https://www.federalregister.gov/documents/2026/01/26/2026-01406/air-plan-approval-indiana-regional-haze-plan-for-the-second-implementation-period
58	MISO Tariff Module E-1	MISO Tariff Module E-1 – Resource Adequacy	https://docs.misoenergy.org/miso12-legalcontent/Module_E-1_-_Resource_Adequacy.pdf
59	[Omitted.]		
60	MISO Tariff Section 38.2.7	MISO Tariff Section 38.2.7	https://docs.misoenergy.org/miso12-legalcontent/Module_C_-_Energy_and_Operating_Reserve_Markets.pdf
61	MISO Tariff Attachment Y	MISO Tariff Attachment Y	https://docs.misoenergy.org/miso12-legalcontent/Attachment_Y_-_Notification_of_Potential_Resource_-_SCU_Change_of_Status.pdf
62	FERC Technical Conference Notice	FERC, *Meeting the Challenge of Resource Adequacy in Regional Transmission Organization and Independent System Operator Regions* (June 2, 2025)	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250602-3068&optimized=false&sid=457eb824-f5ed-41fa-a043-a0cd8c55cb4b

No.	Exhibit Name	Document Name	URL
63	Palgrave Handbook	M. Hafner & G. Luciana, Palgrave Handbook of International Economics (2022) (excerpt)	https://link.springer.com/book/10.1007/978-3-030-86884-0
64	IEA Report	International Energy Agency, The role of CCUS in low-carbon power systems (2020) (excerpt)	https://www.iea.org/reports/the-role-of-ccus-in-low-carbon-power-systems
65	DOE Transmission Planning Study	DOE, Nat'l Transmission Planning Study, Ch. 2: Long-Term U.S. Transmission Planning Scenarios (2024)	https://www.energy.gov/sites/default/files/2024-10/NationalTransmissionPlanningStudy-Chapter2.pdf
66	NERC 2024 Interregional Transfer Capability Study, Part 1	NERC, Interregional Transfer Capability Study: (ITCS) Strengthening Reliability Through the Energy Transformation, Transfer Capability Analysis (Part 1) (Aug. 2024)	https://www.nerc.com/pa/RAPA/Documents/ITCS_Part_1_Results.pdf
67	[Omitted.]		
68	Grid Strategies Sept. Report	Michael Goggin, *A Review of DOE's Second 202(c) Order for the Campbell Coal Plant* (Sept. 2025)	
69	IN Haze SIP Responses to Public Comments	Appendix V, Regional Haze State Implementation Plan Responses to Public Comments (Dec. 29, 2021)	https://downloads.regulations.gov/EPA-R05-OAR-2021-0963-0002/attachment_22.pdf

No.	Exhibit Name	Document Name	URL
70	Konidena September Declaration	Declaration of Rao Konidena (Sept. 3, 2025) (including attachment)	
71	NIPSCO 2018 IRP	Northern Indiana Public Company LLC 2018 Integrated Resource Plan, October 2018	https://www.in.gov/iurc/files/2018-NIPSCO-IRP.pdf
72A	NIPSCO 2021 IRP, part 1	Northern Indiana Public Company LLC 2021 Integrated Resource Plan (October 2021), PDF pp. 1–169	https://www.in.gov/iurc/files/NIPSCO_2021-Integrated-Resource-Plan-Document-1.pdf
72B	NIPSCO 2021 IRP, part 2	Northern Indiana Public Company LLC 2021 Integrated Resource Plan (October 2021), PDF pp. 170–324	(*Same as Exhibit 72A*)
73	NIPSCO May 2022 Investor Call	NiSource reports first quarter 2022 results	https://www.nisource.com/news/article/nisource-reports-first-quarter-2022-results-20220504
74	DOE 202(c) Webpage as of Apr. 22, 2026	U.S. Dep't of Energy, DOE's Use of Federal Power Act Emergency Authority (last visited Apr. 22, 2026)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
75	MISO Tariff Zonal Map	MISO, Attachment VV to FERC-Approved Tariff	https://etariff.ferc.gov/TariffBrowser.aspx?tid=1162
76	Secretary Wright's West Virginia Remarks	Charles Young, West Virginia News, *Energy Secretary Chris Wright: Future of U.S. Coal is "long and bright"* (July 5, 2025)	https://www.wvnews.com/news/wvnews/energy-secretary-chris-wright-future-of-u-s-coal-is-long-and-bright/article_948eb88e-2509-42a3-b985-07c47f1ee151.html

No.	Exhibit Name	Document Name	URL
77	MISO 2021 Transmittal Letter	Transmittal Letter, FERC Docket No. ER22-495-000 (Nov. 30, 2021), Accession No. 20211130-5166	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20211130-5166
78	NiSource 2024 Annual Report	NiSource Inc. 2024 Annual Report (Form 10-K)	https://www.nisource.com/docs/librariesprovider2/sustainability-archives/2024/nisource-2024-annual-report.pdf?sfvrsn=2068f951_6
79	CenterPoint 2024 Annual Report	CenterPoint Energy, Inc. Form 10-K (2024 Annual Report) dated March 4, 2025	https://investors.centerpointenergy.com/static-files/b4884cf5-749f-46ad-9f89-3507d71a725c
80	CenterPoint Indiana 2025 IRP Summary	Executive Summary, CenterPoint Energy Indiana South 2025 Integrated Resource Plan	https://www.in.gov/iurc/files/CEIS_2025_IRP-Non-Technical_Summary.pdf
81	Joundi Testimony	Testimony of Zakaria Joundi, FERC Docket No. ER24-1638 (Mar. 28, 2024), Accession No. 20240328-5329 (Tab E)	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20240328-5329
82	MISO 2024–25 LOLE Study Report	MISO, Planning Year 2024-2025 Loss of Load Expectation Study Report (April 2024)	https://cdn.misoenergy.org/LOLE%20Study%20Report%20PY%202024-2025631112.pdf
83	MISO 2025–26 LOLE Study Report	MISO, Planning Year 2025-2026 Loss of Load Expectation Study Report (April 2025)	https://cdn.misoenergy.org/PY%202025-2026%20LOLE%20Study%20Report685316.pdf?v=20250313114401
84	MISO 2024–25 Auction Results	MISO, Planning Resource Auction Results for Planning Year 2024-25 (Corrected) (April 26, 2024)	https://cdn.misoenergy.org/2024%20PRA%20Results%20Posting%2020240425632665.pdf

No.	Exhibit Name	Document Name	URL
85	MISO Attributes Roadmap	MISO Attributes Roadmap (Dec. 2023)	https://cdn.misoenergy.org/2023%20Attributes%20Roadmap631174.pdf
86	MISO Attributes Roadmap Technical Appendix	MISO, Technical Appendix: Attributes Roadmap (June 2024)	https://cdn.misoenergy.org/2023%20Attributes%20Technical%20Appendix631176.pdf
87	MISO's Response to the Reliability Imperative	MISO's Response to the Reliability Imperative (Feb. 2024)	https://cdn.misoenergy.org/2024+Reliability+Imperative+report+Feb.+21+Final504018.pdf
88	Schahfer Waste Disposal Area Closure Plan	NIPSCO LLC R.M. Schahfer Generating Station Waste Disposal Area Closure Plan – Version #5 (October 2020)	https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/ccr/r.m.-schahfer/r.m.-schahfer-generating-station-closure-and-post-closure-care/r-m-schahfer-generating-station---waste-disposal-area-closure-plan.pdf?sfvrsn=78977151_8
89	2025 OMS-MISO Survey	2025 OMS-MISO Survey Results (June 6, 2025)	https://cdn.misoenergy.org/20250606%20OMS%20MISO%20Survey%20Results%20Workshop%20Presentation702311.pdf
90	MISO ERAS Transmittal Letter	Re: Midcontinent Independent System Operator, Inc. Revisions to the Open Access Transmission, Energy and Operating Reserve Tariff Expedited Resource Addition Study Filing, Docket No. ER25-2454-000 (June 6, 2025), Accession No. 20250606-5228	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250606-5228&optimized=false&sid=c2678d58-1762-48e9-bcca-059a2a848538
91	MISO ERAS Decision	Order Accepting Tariff Revisions, Subject to Condition, 192 FERC 61,064 (July 21, 2025)	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250721-3077&optimized=false&sid=c2678d58-1762-48e9-bcca-059a2a848538

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92	Energy Emergency EO	Exec. Order No. 14,156, 90 Fed. Reg. 8433, Declaring a National Energy Emergency (Jan. 29, 2025)	https://www.govinfo.gov/content/pkg/DCPD-202500123/pdf/DCPD-202500123.pdf
93	Grid EO	Exec. Order No. 14,262, 90 Fed. Reg. 15521, Strengthening the Reliability and Security of the U.S. Electric Grid (Apr. 14, 2025)	https://www.federalregister.gov/documents/2025/04/14/2025-06381/strengthening-the-reliability-and-security-of-the-united-states-electric-grid
94	NY Times Coal Article	Brad Plumer & Mira Rojanasakul, *Trump Signs Orders Aimed at Reviving a Struggling Coal Industry*, NY Times (Sept. 3, 2025).	https://www.nytimes.com/2025/04/08/climate/trump-order-coal-mining.html
95	EIA Table 8.4	U.S. Energy Information Administration Electric Power Annual, Table 8.4: Average power plant operating expenses for major U.S. investor-owned electric utilities	https://www.eia.gov/electricity/annual/table.php?t=epa_08_04.html
96	July 2025 Resource Adequacy Report	DOE, Resource Adequacy Report: Evaluating the Reliability and Security of the United States Grid (July 2025)	https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%29.pdf
97	DOE July 7, 2025 Press Release	*DOE, Department of Energy Releases Report on Evaluating U.S. Grid Reliability and Security* (July 7, 2025)	https://www.energy.gov/articles/department-energy-releases-report-evaluating-us-grid-reliability-and-security

No.	Exhibit Name	Document Name	URL
98	Culley East Ash Pond Closure Plan	Southern Indiana Gas and Electric Company Written Closure Plan 257.102(b) and (d) for the East Ash Pond at the F.B. Culley Generating Station, Revision 1 (September 2021)	https://www.centerpointenergy.com/en-us/Documents/CCR-Reporting/Culley-Station-Closure/Culley-East-Closure-Plan-Rev-1.pdf
99	RFR of July Resource Adequacy Report	Motion to Intervene and Request for Rehearing of Natural Resources Defense Council, the Ecology Center, Environmental Defense Fund, Environmental Law and Policy Center, Public Citizen, Sierra Club, and Vote Solar, DOE Resource Adequacy Report (Aug. 8, 2025).	https://sustainableferc.org/wp-content/uploads/2025/08/2025-08-06_NRDC-et-al-Request-for-Rehearing-DOE-Resource-Adequacy-Report.pdf
100A	NIPSCO 2024 IRP, part 1	Northern Indiana Public Service Company LLC 2024 Integrated Resource Plan (Dec. 9, 2024), PDF pages 1–119	https://www.in.gov/iurc/files/NIPSCO-2024-Integrated-Resource-Plan-Document.pdf
100B	NIPSCO 2024 IRP, part 2	Northern Indiana Public Service Company LLC 2024 Integrated Resource Plan (Dec. 9, 2024), PDF pages 120–239	(*Same as Exhibit 100A*)
100C	NIPSCO 2024 IRP, part 3	Northern Indiana Public Service Company LLC 2024 Integrated Resource Plan (Dec. 9, 2024), PDF pages 240–358	(*Same as Exhibit 100A*)

No.	Exhibit Name	Document Name	URL
101	Schahfer Title V Permit Modification, Feb. 2025	Northern Indiana Public Service Company LLC - R.M. Schahfer Generating Station, Significant Permit Modification No. 073-48085-00008, February 4, 2025	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83755127&dDocName=83759170&Rendition=web&allowInterrupt=1&noSaveAs=1
102	MISO Attachment Y Response to NIPSCO	NIPSCO Notice of Planned Participation under 40 C.F.R. 423.19(h), Oct. 29, 2025 (including letter from MISO dated Feb. 3, 2023)	https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/elg/schahfer-notice-of-planned-participation---elg-rule-2034-subcategory.pdf?sfvrsn=58f9f251_1
103	NIPSCO 2019 Rate Order	IURC Order, Cause No. 45159, Dec. 4, 2019	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/ac4c36e7-ae16-ea11-a997-001dd800b582/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45159%20ORDER%20201912041017168 36.pdf
104	NIPSCO 2023 Rate Order	IURC Order, Cause No. 45772, Aug. 2, 2023	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/a4adc395-4031-ee11-bdf4-001dd80abde3/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_45772_080223.pdf
105	DOE Order No. 202-08-1	DOE Order No. 202-08-1 (Sept. 14, 2008)	https://www.energy.gov/sites/prod/files/202%28c%29%20order%20202-08-1%20September%2014%2C%202008%20-%20CenterPoint%20Energy.pdf
106	NIPSCO 2025 Rate Order	IURC Order, Cause No. 46120, June 26, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/05bff4f4-a952-f011-877a-001dd80b1717/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_46120_062625.pdf
107	Vectren 2014 IRP	Vectren Energy Delivery of Indiana, Inc. 2014 Integrated Resource Plan, November 2014	https://www.in.gov/iurc/files/SIGECO-Vectren_2014_IRP_Report.pdf

No.	Exhibit Name	Document Name	URL
108	Vectren 2016 IRP	Vectren Energy Delivery of Indiana, Inc. 2016 Integrated Resource Plan, December 2016	https://www.in.gov/iurc/files/SIGECO-2016-IRP.pdf
109	Culley East Ash Pond Extension Demonstration	Southern Indiana Gas and Electric Company Request for Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment (November 2020)	https://www.centerpointenergy.com/en-us/Documents/CCR-Reporting/Culley-Station-Closure/Culley-East-Site-Specific-Alternative-to-Initiate-Closure_FINAL.pdf
110	DOE Order No. 202-24-1	DOE Order No. 202-24-1 (Oct. 9, 2024)	https://www.energy.gov/sites/default/files/2024-10/Duke%20202%28c%29%20Order_100924%20FINAL_JMG%20signed.pdf
111	[Omitted.]		
112	Witmeier 2024 Queue Cap Testimony	Errata to Att. X Queue Cap Proposal and Exemptions to Queue Cap, Tab A, Prepared Direct Testimony of Andrew Witmeier, at 21:4, Docket No. ER25-507-000 (Nov. 21, 2024) ("Witmeier 2024 Queue Cap Testimony"), Accession No. 20241213-5063.	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20241213-5063&optimized=false&sid=1e90ede4-da17-4482-8e6d-e346192d0609
113	Inst. Pol'y Integrity Report	Inst. Pol'y Integrity, Enough Energy: A Review of DOE's Resource Adequacy Methodology (July 2025)	https://policyintegrity.org/files/publications/IPI_EnoughEnergy_FinalReport.pdf

No.	Exhibit Name	Document Name	URL
114	IURC 2019 CCGT Order	IURC Order, Cause No. 45052, April 24, 2019	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/4dfb39e0-9f66-e911-8151-1458d04ef938/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45052_ord_20190424102046480.pdf
115	Vectren 2020 IRP	Vectren 2019/2020 Integrated Resource Plan, June 2020	https://www.in.gov/iurc/files/2019-2020-Vectren-IRP-Volume-1-of-2.pdf
116	CenterPoint 2023 IRP	CenterPoint Energy Indiana South 2022/2023 Integrated Resource Plan, May 2023	https://www.in.gov/iurc/files/2022-2023-CNP-IRP-Volume-1-of-2-Redacted.pdf
117	RTO Insider Article	John Cropley & Amanda Durish Cook, DOE Orders Mich. Coal Plant to Remain Available Another 90 Days, RTO Insider (Aug. 21, 2025).	https://www.rtoinsider.com/113044-doe-orders-mich-coal-plant-to-remain-available-another-90-days/
118	RMI Analysis of Coal Plants' Threats to Reliability	Gabriella Tosado, Ashtin Massie & Joe Daniel, *Reality Check: We Have What's Needed to Reliably Power the Data Center Boom, and It's Not Coal Plants*, RMI (Aug. 12, 2025)	https://rmi.org/reality-check-we-have-whats-needed-to-reliably-power-the-data-center-boom-and-its-not-coal-plants/
119	MISO, ZRC Replacement Guidance	ZRC replacement and instructions in the MECT, Resource Adequacy Subcommittee (May 5, 2023	https://cdn.misoenergy.org/20230524%20RASC%20Item%2004b%20ZRC%20Replacement628921.pdf
120	2024 OMS-MISO Survey	2024 OMS-MISO Survey Results (June 20, 2024)	https://cdn.misoenergy.org/20240620%20OMS%20MISO%20Survey%20Results%20Workshop%20Presentation635585.pdf

No.	Exhibit Name	Document Name	URL
121	Witmeier 2025 ERAS Testimony	Prepared Direct Testimony of Andrew Witmeier, FERC Docket No. ER25-2454-000, (June 6, 2025), Accession No. 20250606-5228	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20250606-5228
122	GridLab Report	GridLab Analysis: Department of Energy Resource Adequacy Report (July 11, 2025)	https://gridlab.org/gridlab-analysis-department-of-energy-resource-adequacy-report/
123	Duke University Rethinking Load Growth Study	Tyler H. Norris et al., Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems, Duke University Nicholas Institute for Energy, Environment & Sustainability (Feb. 2025)	https://nicholasinstitute.duke.edu/sites/default/files/publications/rethinking-load-growth.pdf
124	November Campbell Order	DOE Order No. 202-25-9 (November 18, 2025)	https://www.energy.gov/sites/default/files/2025-11/Order%20No%20202-25-9.pdf
125	IURC AB Brown CT Order	IURC Order, Cause No. 45664, June 28, 2022	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/1b5e5448-13f7-ec11-bb3b-001dd80095d7/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_45564_062822%20.pdf
126	IURC 2025 CenterPoint Rate Order	IURC Order, Cause No. 45990, Feb. 3, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/4355f179-6be2-ef11-8eea-001dd8067cf7/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_45990_020325.pdf
127	Chrissy Behme Testimony	Direct Testimony of Chrissy M. Behme on behalf of CenterPoint Energy Indiana South,	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/63d5d9a2-4594-ee11-8178-001dd8065be9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45990_CEI%20South_E

No.	Exhibit Name	Document Name	URL
		Cause No. 45990, Dec. 5, 2023	x%202%20-%20Behme%20(PUBLIC)_120523.pdf
128	[Omitted.]		
129	Energy Innovation Report	Eric G. Gimon, Senior Fellow, Energy Innovation, *Dodging the Firm Fixation for Data Centers and the Grid* (Nov. 2025)	https://energyinnovation.org/wp-content/uploads/Dodging-the-Firm-Fixation-for-Data-Centers-and-the-Grid.pdf
130	NERC Emergency Operations	N. Am. Elec. Reliab.Corp., EOP-011-4 Emergency Operations (last visited Jan. 8, 2026)	https://www.nerc.com/globalassets/standards/reliability-standards/eop/eop-011-4.pdf
131	Eddystone November Order	DOE Order No. 202-25-10 (Nov. 25, 2025)	https://www.energy.gov/sites/default/files/2025-11/Order%20No.%20202-25-10.pdf
132	NIPSCO Rate Case Discovery Responses	NIPSCO Responses to Indiana Office of the Utility Consumer Counselor's Ninth Set of Data Requests in IURC Cause No. 46120, Nov. 4, 2024	
133	Department Press Release on Centralia Order	U.S. Dep't of Energy, Energy Secretary Ensures Washington Coal Plant Remains Open to Ensure Affordable, Reliable and Secure Power Heading into Winter(Dec. 17, 2025)	https://www.energy.gov/articles/energy-secretary-ensures-washington-coal-plant-remains-open-ensure-affordable-reliable-and

No.	Exhibit Name	Document Name	URL
134	MISO Manual on Resource Adequacy	MISO, BPM-011-r31, *Resource Adequacy Business Practices Manual* (Feb. 21, 2025)	https://www.misoenergy.org/legal/rules-manuals-and-agreements/business-practice-manuals/
135	Holtec News Release	Holtec Int'l, *Holtec Receives Coveted "Tier 1 First Mover Award" from the USDOE to Accelerate Deployment of its Dual-Unit SMR-300 Plant at the Company's Palisades Energy Site* (Dec. 2, 2025)	https://holtecinternational.com/hh-40-24/
136	Utility Dive Article on Palisades Plant	Meris Lutz, UtilityDive, *Palisades Becomes First Decommissioned US Nuclear Plant to Reach 'Operations' Status* (Aug. 28, 2025)	https://www.utilitydive.com/news/palisades-nuclear-plant-holtec-nrc-operations/758845/
137	R Street Institute Commentary: *DOE "Zombies" Are Eating Competitive Power Markets*	Michael Giberson, Senior Fellow, R Street Institute, *Low-Energy Fridays: DOE "Zombies" Are Eating Competitive Power Markets* (Nov. 13, 2025)	https://www.rstreet.org/commentary/low-energy-fridays-doe-zombies-are-eating-competitive-power-markets/
138	MISO Fall 2025 Operations Report	Bd. of Directors Mkts. Committee, MISO, *Operations Report* (Dec. 9, 2025)	https://cdn.misoenergy.org/20251209%20Markets%20Committee%20of%20the%20BOD%20Item%2006%20MISO%20Operations%20Report730265.pdf
139	Report of the Nat'l Energy Pol'y Dev. Grp	*Reliable, Affordable, and Environmentally Sound Energy for America's Future*: Report of the National Energy Policy Development Group (May 2001)	https://www.nrc.gov/docs/ml0428/ml042800056.pdf

No.	Exhibit Name	Document Name	URL
140	MISO ERAS December Release	MISO, *MISO Announces Second Cycle of ERAS Projects* (Dec. 1, 2025)	https://www.misoenergy.org/meet-miso/media-center/2025---news-releases/miso-announces-second-cycle-of-eras-projects
141	[Omitted.]		
142	Energy Reliability and Resilience	U.S. Dep't of Energy, Energy Reliability and Resilience (webpage as of Oct. 21, 2025)	https://web.archive.org/web/20251021071021/https:/www.energy.gov/eere/energy-reliability-and-resilience
143	NERC 2025–2026 Winter Reliability Assessment	NERC, *2025–2026 Summer Reliability Assessment* (Nov. 18 2025)	https://www.nerc.com/globalassets/our-work/assessments/nerc_wra_2025.pdf
144	[Omitted.]		
145	NERC Email	Email from NERC Communications Announcements to Rachel Sherrard et al. Re: Announcement | NERC 2025-2026 Winter Reliability Assessment | Rising Demand, Evolving Resources Continue to Challenge Winter Grid Reliability (Nov. 18, 2025 at 2:02:44 PM EST)	
146	[Omitted.]		

No.	Exhibit Name	Document Name	URL
147	Schahfer 2024 Groundwater Monitoring Report	Northern Indiana Public Service Company LLC, R.M. Schahfer Generating Station Waste Disposal Area 2024 Annual Groundwater Monitoring and Corrective Action Report	https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/ccr/r.m.-schahfer/r.m.-schahfer-generating-station-groundwater-moniitoring-and-corrective-action/2025-rm-schahfer-generating-station-waste-disposal-area-annual-groundwater-monitoring-and-corrective-action-report.pdf?sfvrsn=1fc2fa51_3
148	Culley 2024 Groundwater Monitoring Report	Southern Indiana Gas and Electric Company Annual Groundwater Monitoring and Corrective Action Report, East Ash Pond, F.B. Culley Generating Station, January 2025	https://www.centerpointenergy.com/en-us/Documents/CCR-Reporting/Culley-Station-Groundwater-Monitoring/Culley_East_Ash_Pond_Annual_GroundWater_Report_2025.pdf
149	New York Times Article on Trump's Coal Plant Policy	Claire Brown and Brad Plumer, New York Times, *Trump Wants to Halt Almost All Coal Plant Shutdowns. It Could Get Messy* (Jan. 16, 2026)	https://www.nytimes.com/2026/01/16/climate/trump-coal-plants.html
150	May Campbell Order	DOE Order No. 202-25-3 (May 23, 2025)	https://www.energy.gov/sites/default/files/2025-05/Midcontinent%20Independent%20System%20Operator%20%28MISO%29%20202%28c%29%20Order_1.pdf
151	August Campbell Order	DOE Order No. 202-25-7, August 20,, 2025	https://www.energy.gov/sites/default/files/2025-08/MISO%20Order%20No.%20202-25-7.pdf
152	CenterPoint Rate Case Discovery Responses	IURC Cause No. 45990, CenterPoint Energy Indiana South Responses to the Indiana Office of	

No.	Exhibit Name	Document Name	URL
		the Utility Consumer Counselor's Twenty-Sixth Set of Data Requests	
153	Wayne Games 2018 Testimony	IURC Cause No. 45052, Public Rebuttal Testimony of Wayne D. Games on behalf of Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc., Sep. 10, 2018	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/e4ded2b4-c5b5-e811-8144-1458d04ef938/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45052%20VectrenSouth%20PublicExhibit4RRebuttalTestimonyWayneGames%20091018.pdf
154	EPA COBRA Schahfer Retirement Analysis	U.S. Environmental Protection Agency, CO-Benefits Risk Assessment (COBRA) for nationwide benefit based on reduction of annual emissions from Schahfer 17 and 18	
155	EPA COBRA Culley Retirement Analysis	U.S. Environmental Protection Agency, CO-Benefits Risk Assessment (COBRA) for nationwide benefit based on reduction of annual emissions from Culley 2	
156	CenterPoint Cost Allocation Complaint	Southern Indiana Gas and Electric Company, Complaint Requesting Fast Track Processing, FERC Docket No. EL26-38-000, Jan. 5, 2026	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20260105-5189
157	MISO Comments to FERC	Answer of the Midcontinent Independent System Operator, Inc., FERC	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20260120-5226&optimized=false&sid=07e217b3-76d9-4e6a-9a2b-99ee7f2229d4

No.	Exhibit Name	Document Name	URL
		Docket No. EL26-36-000, Jan. 20, 2026	
158	March Schahfer Order	U.S. Department of Energy's March 23, 2026 Emergency Order No. 202-26-19	https://www.energy.gov/documents/doe-order-no-202-26-19-schahfer
159	March Culley Order	U.S. Department of Energy's March 23, 2026 Emergency Order No. 202-26-20	https://www.energy.gov/documents/doe-order-no-202-26-20-culley
160	Department Order No. 202-26-01	U.S. Department of Energy's January 24, 2026 Emergency Order No. 202-26-01	https://www.energy.gov/documents/order-no-202-26-01-ercot
161	Department Order No. 202-26-01A	U.S. Department of Energy's January 25, 2026 Amended Emergency Order No. 202-26-01a	https://www.energy.gov/documents/amended-order-no-202-26-01a
162	Department Order No. 202-26-03	U.S. Department of Energy's January 25, 2026 Emergency Order No. 202-26-03	https://www.energy.gov/documents/order-no-202-26-03-iso-ne
163	DOE Order No. 202-22-2 Amendment No. 1	U.S. Department of Energy's September 8, 2022 Emergency Order No. 202-22-2 Amendment No. 1	https://www.energy.gov/sites/default/files/2022-09/Amendment%20No.%201%20to%20Order%20202-22-2%20sb%20A_S3%20Hogan.pdf
164	Starfield Email to Hoffman	Email from Lawrence Starfield, EPA to Patricia Hoffman, DOE Re: DOE section 202(c) order (Sept. 11, 2017)	https://www.energy.gov/sites/default/files/2017/09/f36/2017-9-11%20EPA%20consultation%20renewal.pdf

No.	Exhibit Name	Document Name	URL
165	February 2026 Campbell Order	U.S. Department of Energy's February 17, 2026 Emergency Order No. 202-26-16	https://www.energy.gov/documents/order-no-202-26-16-campbell
166	Grid Strategies LTRA Review	Adria E. Brooks et. al., *Review of NERC's 2025 Long-Term Reliability Assessment,* Grid Strategies (Mar. 5, 2026)	https://gridstrategiesllc.com/wp-content/uploads/FINAL-2025-LTRA-Review.pdf
167	DOE Order No. 202-22-1 Amendment No. 2	U.S. Department of Energy's September 8, 2022 Emergency Order No. 202-22-1 Amendment No. 2	https://www.energy.gov/sites/default/files/2022-09/Amendment%202%20to%20Order%202022-22-1_FINAL_9.8.2022%20sb%20A_S3%20Hogan.pdf
168	PIOs' January Rehearing Request	Motion to Intervene and Request for Rehearing and Stay of Public Interest Organizations, Department of Energy Order Nos. 202-25-12, 202-25-13 (Jan. 22, 2026)	https://www.energy.gov/documents/motion-intervene-and-request-rehearing-and-stay-sierra-club-citizens-action-coalition
169	CenterPoint Letter to USDOE	Letter from CenterPoint Energy to United States Department of Energy dated Feb. 17, 2026	
170	MISO 2026–2027 Planning Auction Timeline	Appendix K – Resource Adequacy Timeline for activities for the Planning Year 2026-2027	https://cdn.misoenergy.org/PY%2026-27%20RA%20Timeline720494.pdf
171	MISO ERAS March Release	"MISO accelerates resource additions with third ERAS cycle" (Mar. 9, 2026)	https://www.misoenergy.org/meet-miso/media-center/2026---news-releases/miso-accelerates-resource-additions-with-third-eras-cycle

No.	Exhibit Name	Document Name	URL
172	ERAS Interconnection Requests	ERAS Interconnection Requests as of March 24, 2026	https://cdn.misoenergy.org/ERAS%20Interconnection%20Requests718481.pdf?v=20250925100448
173	Konidena April Declaration	Declaration of Rao Konidena (Apr. 17, 2026) (including attachment)	
174	Saffran Q4 2025 Outage Testimony	Direct Testimony of David Saffran on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 150, Feb. 16, 2026	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/2cec3529-6e0b-f111-8406-001dd80babc6/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC150_NIPSCO_Petitioners%20Exhibit%204%20(Saffran)_02162026.pdf
175	Wagner February Testimony	Direct Testimony of John A. Wagner on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 150, Feb. 16, 2026	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/209c4c11-6e0b-f111-8406-001dd80babc6/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC150_NIPSCO_Petitioners%20Exhibit%203%20(Wagner)_02162026.pdf
176	MISO 2026–2027 CIL/CEL Results	MISO Planning Year 2026–2027 Capacity Import Limit / Capacity Export Limit Results (Oct. 30, 2025)	https://cdn.misoenergy.org/20251030%20LOLEWG%20Item%2004%20PY%202026-2027%20CIL_CEL%20Results724589.pdf
177	NERC January 2026 LTRA	Long-Term Reliability Assessment, January 2026, North American Electric Reliability Corporation	https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf
178	Curran Testimony	Statement of Jennifer Curran, Senior Vice President for Planning and Operations,	https://democratsenergycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov

No.	Exhibit Name	Document Name	URL
		Midcontinent Independent System Operator)	
179	RTO Insider March 2026 Article	MISO: NERC to Dial Down RTO's Risk Level; Members Create Large Load Working Group	https://www.rtoinsider.com/128949-miso-nerc-will-lower-risk-level-stakeholders-create-large-load-working-group
180	IURC March 2026 Public Meeting	Excerpt in .MP4 format of video recording of IURC March 2026 Investigative Inquiry on Energy Affordability (Mar. 24, 2026), beginning at 3:45:19 timestamp	https://www.youtube.com/watch?v=uXEwNQdi3r0
181	MISO January Filing	Answer of the Midcontinent Independent System Operator, Inc., FERC Docket No. EL26-38-000 (Jan. 26, 2026)	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20260126-5150&optimized=false&sid=17118e9c-5237-458d-b087-880602d58476
182	2026 DOE 202(c) Orders Webpage	U.S. Department of Energy Office of Cybersecurity, Energy Security, and Emergency Response, 2026 Section 202(c) Orders Webpage (last accessed April 22, 2026)	https://www.energy.gov/ceser/2026-doe-202c-orders
183	MISO January Operations Report	MISO Monthly Operations Report, January 2026	https://cdn.misoenergy.org/202601%20Market%20and%20Operations%20Report742938.pdf

No.	Exhibit Name	Document Name	URL
184A	Schahfer Landfill 2025 Groundwater Monitoring Report, Part 1	September 2025 Semi-Annual Groundwater Monitoring Report, Schahfer RWS I Landfill (Nov. 10, 2025), pages 1–194	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83889189&dDocName=83893231&Rendition=web&allowInterrupt=1&noSaveAs=1
184B	Schahfer Landfill 2025 Groundwater Monitoring Report, Part 2	September 2025 Semi-Annual Groundwater Monitoring Report, Schahfer RWS I Landfill (Nov. 10, 2025), pages 195–299	(*Same as Exhibit 184A*)

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 194
IURC 2026 Summer Reliability Forum (May 19, 2026)

Indiana Utility Regulatory Commission

2026 Summer Reliability Forum

(May 19, 2026)

Actual exhibit is a digital excerpt in .MP4 format of the video recording of the IURC 2026 Summer Reliability Forum (May 19, 2026), beginning at the 05:01:08 timestamp.

Video recording of the full event is also available on YouTube at:

https://www.youtube.com/watch?v=MdJIjHZEJt4&t=1s

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 195
NIPSCO Summer 2026 Reliability Presentation

NIPSCO
A NiSource Company









OUR VISION IS TO BE A
PREMIER, INNOVATIVE & TRUSTED
ENERGY PARTNER



2026 Summer Reliability Forum

May 19, 2026

NIPSCO Presenters



Vince Parisi
President and COO



Rufus Jackson
SVP Electric Operations



Karl Stanley
VP Supply & Optimization



Phil Winter
Sr Director Power Delivery



Rockey Pollard
Director Station Chem & Env

NIPSCO Profile

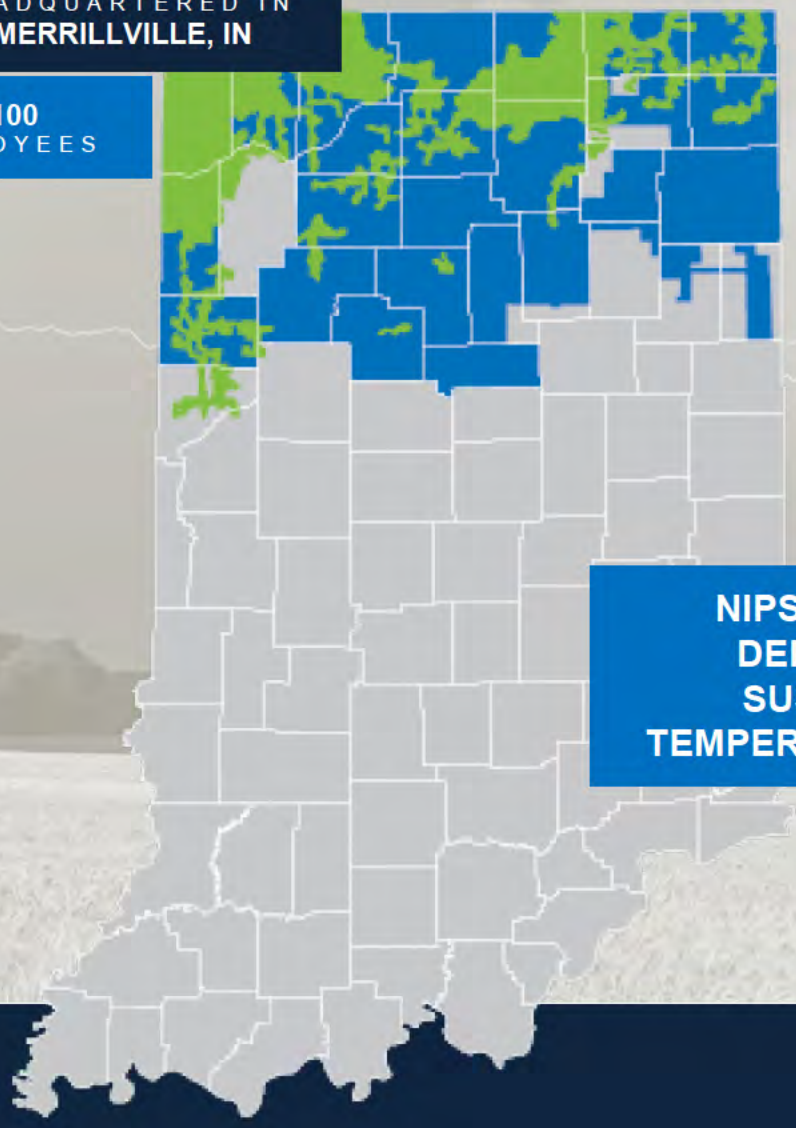
IMPROVING THE LIVES OF APPROXIMATELY 1.4 MILLION CUSTOMERS ACROSS NORTHERN INDIANA

ELECTRIC

- ~500,000 electric customers
- Second-largest electric distribution company in Indiana
- 3,985.25 MW generating capacity
  - 2 coal generation facilities
  - 2 CT's
  - 1 CCGT
  - 2 hydro electric generation facilities
  - 8 owned renewable generation facilities in service
- Transmission system has voltages from 69,000 to 765,000 volts, consisting of approximately 3,000 circuit miles
  - Interconnected with 8 neighboring electric utilities
  - Operate 66 transmission and 250 distribution substations
  - Own ~311,300 poles

HEADQUARTERED IN
MERRILLVILLE, IN

3,100
EMPLOYEES



NATURAL GAS

- 900,000 natural gas customers
- Largest natural gas distribution company in Indiana
- ~18,000 miles of distribution main pipeline
- ~710 miles of transmission main pipeline
- Two on-system storage facilities

NIPSCO'S SYSTEM MUST BE BUILT TO DELIVER FOR CUSTOMERS DURING SUSTAINED PERIODS OF EXTREME TEMPERATURES AND WEATHER CONDITIONS

Changes Since Last Summer Reliability Forum

DOE 202(c) Order

- On December 23, 2025, the Secretary of Energy issued DOE Order No. 202-25-12 (Order) which directed NIPSCO and MISO to "take all measures necessary" to ensure that Schahfer Units 17 and 18 continue to operate.
- Under Section 202(c) of the Federal Power Act, DOE's Orders are in effect for a maximum of 90 days; subsequent 90-day Orders may be issued for the same units.
- On March 23, 2025, DOE extended the Order for another 90 days.

Post-Order Operations of Units 17 and 18

- At the time of the Order, Unit 17 was derated while Unit 18 was in a MISO Forced Outage.
- Pursuant to the Order, NIPSCO offered Unit 17 into the market up to its derated availability until it went into a planned outage March 1.
- NIPSCO has begun repairs to return Units 17 and 18 to full operations pursuant to the Order.

NIPSCO's FERC Complaint Case Against MISO

- On December 29, 2025, NIPSCO filed a Complaint at FERC against MISO asserting that the MISO Tariff does not contain a Tariff Schedule for recovery of the costs associated with repairing and operating Units 17 and 18.
- As part of the Complaint, NIPSCO proposed a Tariff Schedule 56 that would uplift these costs to all customers on a pro-rata basis in the MISO Northern and Central Zones.
- On March 19, 2026, FERC issued Order granting complaint against MISO, requiring MISO to make a compliance filing adding NIPSCO's Schedule to the MISO Tariff.

After FERC Issues Order on Complaint Case

- NIPSCO is currently preparing its FERC case for recovery of the costs associated with Units 17 and 18 for filing.



GenCo Model to Support Data Center Development

NIPSCO Generation (GenCo)

- **Separate utility company created to build, own, and operate major investments**
  - These costs are excluded from the costs to serve NIPSCO's other electric customers
- Isolates major capital investments to protect from rate increases and end-of-contract risks
- Existing customers will not pay for any of the capacity / generation or load-side investments needed to serve data centers now or in the future
- Investments made by data center customers help build a more resilient and reliable grid, and additional generation will provide benefits to all customers



Structure will Drive Customer Savings

- **GenCo cost savings total approximately $1.4 billion for existing customers through Alphabet and Amazon collaboration**
- Residential customers will receive a credit each month, which will begin in 2027
- Additional contracts will drive additional savings to electric customers

Creation of Customer Fund

- NIPSCO and GenCo will make $17+ million of contributions to a "customer fund" over the next 15 years, fully funded by shareholders
- 50% will be for the local communities where generation and data center development occur
- 50% will be passed back to all NIPSCO electric customers as part of the customer credit discussed above

Generation Portfolio

NEW GENERATION FACILITIES*	INSTALLED CAPACITY (MW)	COUNTY	IN SERVICE
ROSEWATER WIND	102 MW	WHITE	2020 COMPLETE
JORDAN CREEK WIND	400 MW	BENTON & WARREN	2020 COMPLETE
INDIANA CROSSROADS WIND	302 MW	WHITE	2021 COMPLETE
DUNNS BRIDGE SOLAR I	265 MW	JASPER	2022 COMPLETE
INDIANA CROSSROADS SOLAR	200 MW	WHITE	2023 COMPLETE
INDIANA CROSSROADS II WIND	200 MW	WHITE	2023 COMPLETE
CAVALRY SOLAR	200 MW + 45 MW BATTERY	WHITE	2024 COMPLETE
GREEN RIVER SOLAR	200 MW	BRECKINRIDGE & MEADE (KY)	2025 COMPLETE
DUNNS BRIDGE SOLAR II	435 MW + 56.25 MW BATTERY	JASPER	2025 COMPLETE
GIBSON SOLAR	200 MW	GIBSON	2025 COMPLETE
FAIRBANKS SOLAR	250 MW	SULLIVAN	2025 COMPLETE
APPLESEED SOLAR	200 MW	CASS	2025 COMPLETE
CARPENTER WIND	200 MW	JASPER	2025 COMPLETE
TEMPLETON WIND	200 MW	BENTON	2027 PRE-CONSTRUCTION
GAS PEAKING RESOURCE	400 MW	JASPER	2027 PRE-CONSTRUCTION

GENERATION FACILITIES	INSTALLED CAPACITY (MW)	FUEL	COUNTY
MICHIGAN CITY RETIRING 2028	455 MW	COAL	LAPORTE
R.M. SCHAHFER OPERATING UNDER 202C ORDER	722 MW + 155 MW	COAL + NATURAL GAS	JASPER
SUGAR CREEK	563 MW	NATURAL GAS	VIGO
NORWAY HYDRO	7.2 MW	WATER	WHITE
OAKDALE HYDRO	9.2 MW	WATER	CARROLL



NIPSCO
A NiSource Company

Changes in Generation Fleet

Since last year's Summer Reliability Forum NIPSCO added:

- Carpenter Wind (PPA): 200 MW
- Appleseed Solar (PPA): 200 MW

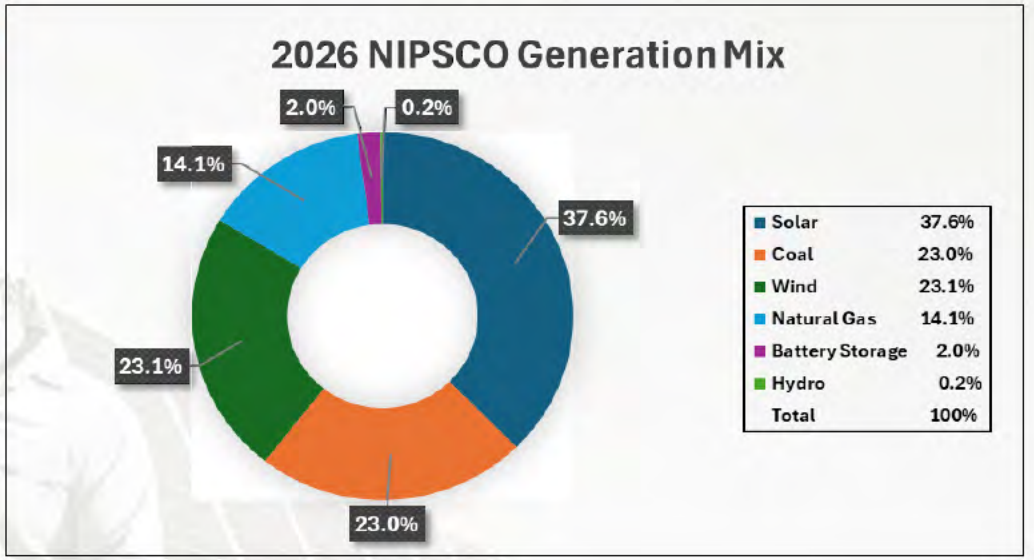
The biggest change since 2021 to NIPSCO's fleet is the addition of:

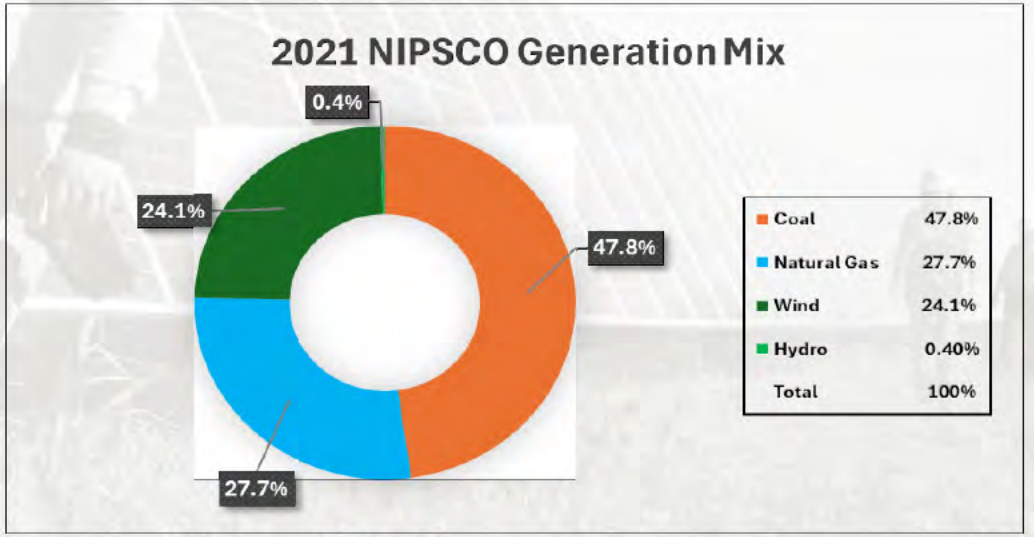
- 3 Wind Farms
- 8 Solar Farms
- 2 Battery Storage Units











Capital Investments

Safety & Reliability
- AMI
- Distribution Automation

Renewables
- Wind, Solar, & Battery Storage Projects
- Associated Transmission Projects

Maintenance
- Pole Life Extension Program
- Power Transformer Replacements

Growth
- Circuit Reconductors
- New Substations

Electric	2021	2022	2023	2024	2025	TOTAL
Safety & Reliability	5.5	38.1	108.5	155.3	136.5	443.9
MISO	0.0	0.0	0.0	27.6	72.9	100.5
Renewables	63.3	362.0	997.1	617.4	1,260.7	3,300.5
Public Improvement	45.4	4.9	9.6	7.4	9.8	77.1
Maintenance	320.1	375.9	462.4	391.5	291.1	1,841.0
Growth	47.7	67.5	98.8	119.3	291.5	624.8
TOTAL	482.0	848.4	1,676.5	1,318.5	2,062.4	6,387.8

Reliability Improvements Since Last Summer Reliability Forum

Distribution Automation & System Modernization

- This program identifies circuits that need additional sectionalizing capabilities or that serve emergency services.
- Deploying reclosers and upgrading modern protective relaying reduces the number of customers affected during outages by detecting and isolating faults on the circuit.
- This program evaluates areas with 3-phase trunk lines and long single-phase taps that need additional sectionalizing devices to reduce the number of unprotected areas and minimize the number of customers affected by outages.
- In 2025, there were 30 three-phase reclosers deployed. Areas were prioritized based upon reliability performance and population density.

Circuit Performance Improvement (CPI) & Cable Replacement Programs

- These programs target the worst performing overhead and underground circuits and taps.
- CPI has improved the reliability for customers experiencing the poorest reliability in 2024-2025.
- In 2025, 42 miles of unjacketed underground cable was replaced mitigating over 80% of the interruptions on the addressed circuits.

Pole Inspection Program & Life Extension Program

- This program includes the inspection and treatment of all poles on a 10-year cycle.
- In 2025, there were 1,530 poles replaced or reinforced based upon inspection results.
- Replacing poles no longer meeting strength requirements helps to prevent failures during severe weather.

Changes in Resource Adequacy Since 2021

- MISO introduced a **Seasonal Resource Adequacy Construct** for the Planning Year 2023/2024. Previously Resource Adequacy had been measured on an annual basis, while the Seasonal Resource Adequacy Construct breaks the planning year into four seasons, with each season having a separate planning resource margin and separate asset capacity accreditation values.
- This move to a seasonal construct makes the accreditation for each resource more fluid from season to season, as well as year after year, which could result in the need for more or less resources during select times of the year.
- In 2024, MISO announced that they would be switching their planning resource modeling framework to a **Direct Loss of Load** (DLOL) methodology starting in Planning Year 2028/2029.
- This new methodology will look at not only peak hours during each season but will include "tight" hours whereby the amount of resources available might not be sufficient to meet the load.
- **This new methodology is expected to capture the changing behavior of the portfolio as more renewables and battery energy storage systems penetrate the resource portfolio.**



Resource Adequacy Position

- MISO's Planning Resource Auction (PRA) results were released on April 28, 2026. There are no operational and resource concerns for the Planning Year 2026-2027.

- NIPSCO participated in MISO's PRA with **surplus capacity of 896.4 MW in the summer season and 737.1 in the fall season.**

- NIPSCO was party to several successful seasonal transactions and believes that the current planning year will be easier to navigate as participants become more comfortable with the process, capacity market design questions are satisfied, and seasonal markets become more robust.

- There is a greater emphasis on unit availability, performance, and outages by MISO seasonal construct that could drive the need for unexpected replacement capacity during seasons.

- The demand response program does not factor into NIPSCO's jurisdictional demand. However, it is used by Rate 631 large industrial customers to balance their resource adequacy requirement.

Unit Availability & Spring Maintenance Outages

MCGS Unit 12 is currently online and Full Load capable

- Unit 12 was in a successful Planned Outage from 2/27/26 through 3/21/26
- Significant work was done on unit cleaning for the summer run as well as cooling tower repairs

RMSGS Units 16A and 16B have been offline in Forced Outage since 3rd quarter of 2025

- Both units are undergoing a full turbine and compressor overhaul
- Expect to have 16A available 5/27/26 and 16B on 7/10/26

RMSGS Unit 17 has been in a Planned Maintenance Outage since 2/28/26

- Significant boiler and turbine work underway to support DOE 202c
- Turbine work is critical path with a tentative return end of Q3; inspections are ongoing

RMSGS Unit 18 has been offline in Forced Outage since July of 2025

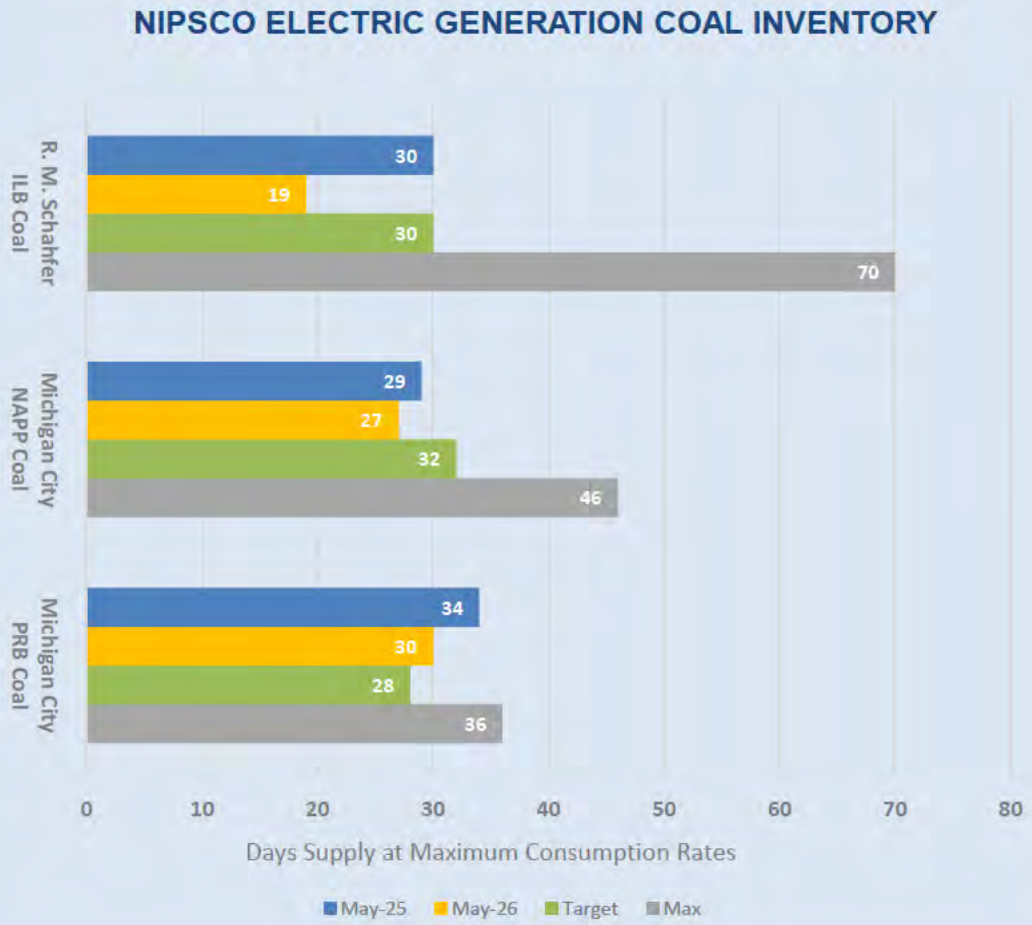
- Significant boiler and turbine work underway to support DOE 202c
- Turbine work is critical path with a tentative return end of Q3; inspections are ongoing

2026 NIPSCO Generation Outage Season: February through July						
July	Week 5				Unit 17	Unit 18
	Week 4					
	Week 3					
	Week 2			Unit 16B		
	Week 1					
June	Week 4					
	Week 3					
	Week 2					
	Week 1		Unit 16A			
May	Week 4					
	Week 3					
	Week 2					
	Week 1					
April	Week 4					
	Week 3					
	Week 2					
	Week 1					
March	Week 4	Unit 12				
	Week 3					
	Week 2					
	Week 1					
February	Week 4					
	Week 3					
	Week 2					
	Week 1					

Fuel Availability

Coal Supply

- NIPSCO's coal inventory balances the costs associated with maintaining coal inventory with reliability to ensure units are available to supply energy during periods of high demand, extreme weather, fuel transportation disruptions, or mine production problems.
- NIPSCO has maintained inventory levels near target levels despite variable consumption rates. Class I railroad performance has been good over the last three years which reduces delivery variability and ultimately helps control inventory levels.
- NIPSCO typically builds inventory ahead of winter and summer peaks and is projecting **Michigan City inventories will be near targets at the start of summer.**
- **Schahfer's inventory is being increased during 2026** after it was reduced to near zero prior to receiving the DOE 202c order to extend operations. NIPSCO has proposed to uplift Schahfer's ongoing operating costs to all customers on a pro-rata basis in the MISO Northern and Central Zones.
- **NIPSCO has firm coal supply contracts, coal transportation agreements, and an adequate fleet of railcars to ensure reliable coal supply for all electric generation needs.**



Fuel Availability

Natural Gas Supply

- **NIPSCO has firm natural gas to ensure reliable natural gas supply for all electric generation needs.**
- The Customer will see the benefits of 100% generation availability for gas and coal due to our firm fuel contracts.
- NIPSCO's electric operations procure natural gas for electric generation. NIPSCO holds 70,000 Dth/d of firm transportation directly on Midwestern Gas Transmission Interstate pipeline. This contract ensures fuel supply reliability and resource adequacy planning.



Winter Storm Fern

Generator Winter Performance

- Nine periods of MISO cold weather alerts, including Winter Storm Fern, which was from January 23 to January 27
- Winter customer peak of 1,946.5 MW occurred on Friday, January 23
- Overall winter operational performance December 1 to February 28 was over target at 19.5% EFOR
- Schahfer Unit 17 ran continuously during the month of January 2026, and generated over 38,000 MWH of energy into MISO during Winter Storm Fern

Lessons Learned: Winter Storm Fern

- First MISO emergency event for BESS
  - Modifying charge/discharge decisions for future
- Modifying future gas pre-emergency procurement decisions

NIPSCO Electric Winter Preparedness Roadmap

	Winter Operations	Post – Winter Ops Prep	Pre-Winter Ops Review
Timeline	DEC 1st – MAR 31st	APR 1st – JULY 31st	AUG 1st – DEC 1st
Outputs & Outcomes	Safe & reliable system operations	Debrief, lessons learned, & updates to operating procedures	Review open WO's, execute prioritized PM tasks & perform severe weather storm drill
Stakeholder Engagement	Event driven touchpoints & status reports	Periodic touchpoints	Periodic touchpoints & status reports

Summer Bill Projections

NIPSCO SUMMER BILL PROJECTIONS

MONTH	PROJECTED USAGE *(KWH)*	2026 *(PROJECTED RATES)*
MAY	572.0	$135.21
JUNE	791.9	$181.57
JULY	988.9	$223.17
AUGUST	911.4	$216.73
SEPTEMBER	626.9	$154.71
TOTAL	**3,891.1**	**$911.39**

The average electric residential bill is projected to be $182.28 for the summer season.



NIPSCO residential electric customers should expect their summer cooling bills to be higher this season compared to last year due primarily to base rate increases in 2025 and 2026. These increases are partly offset by lower forecasted tracker costs.

WHAT ARE WE DOING

PROGRAMS, OFFERINGS & INITIATIVES

- **Energy Assistance**
  - Federal/State
  - Company-Funded
- **Energy Efficiency**
  - Low-Income Audits
  - Tips & Calculators
- **Billing & Payment Offerings**
  - Levelized Billing Plan
  - DependABill
  - Payment Plans
- **Bill Explainers**
- **Billing Worksheets**
- **Infographics**
- **Videos**
- **Website Enhancements**
- **Paid Social Media Outreach**
- **Customer Newsletters**
  Mailers – December 2025
- **Emails**
- **Customer Care Center Events**

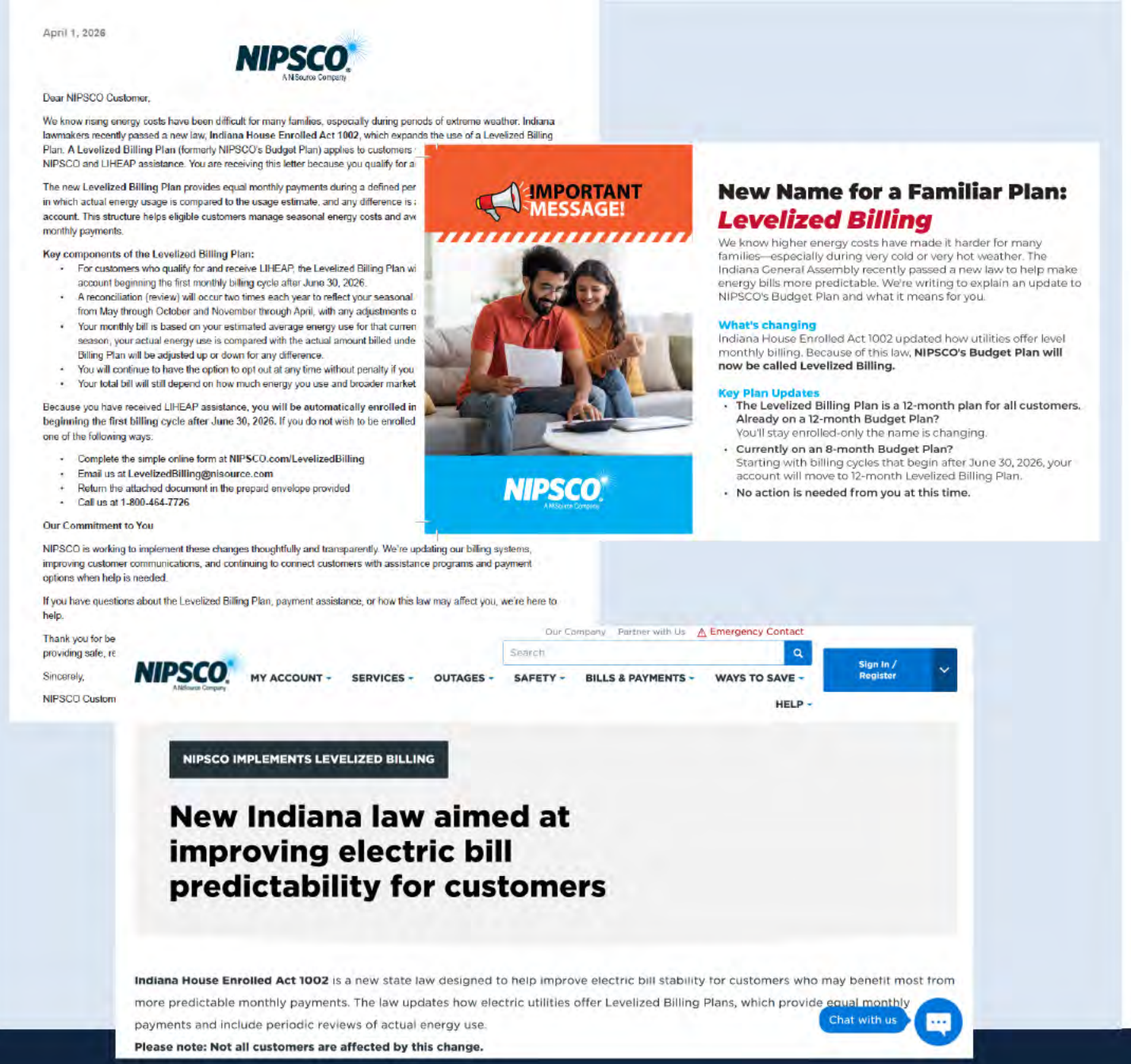
Levelized Billing Plan

Levelized Billing Implementation

- Levelized Billing Plan will be applied to all **LIHEAP approved electric and combo residential customers** July 1.
- All **customers (electric, gas, and combo) currently on Budget Plan** will move to Levelized Billing Plan July 1.
- **Seasonal periods** will run from May through October and November through April, with any adjustments made in May and November.

Customer Communications

- **Web site enhancements** regarding Levelized Billing Plan and reconciliation mechanism
- **Letters to LIHEAP customers** informing them of auto-enroll to Levelized Billing Plan and process for opting out
- **Letter to Budget Plan customers** informing them of move to Levelized Billing Plan and process for opting out
- **Bill inserts**
- **Call Aid** for CSRs



April 1, 2026

NIPSCO
A NiSource Company

Dear NIPSCO Customer,

We know rising energy costs have been difficult for many families, especially during periods of extreme weather. Indiana lawmakers recently passed a new law, **Indiana House Enrolled Act 1002**, which expands the use of a Levelized Billing Plan. A Levelized Billing Plan (formerly NIPSCO's Budget Plan) applies to customers
NIPSCO and LIHEAP assistance. You are receiving this letter because you qualify for a

The new Levelized Billing Plan provides equal monthly payments during a defined per
in which actual energy usage is compared to the usage estimate, and any difference is
account. This structure helps eligible customers manage seasonal energy costs and av
monthly payments.

Key components of the Levelized Billing Plan:

- For customers who qualify for and receive LIHEAP, the Levelized Billing Plan wi
  account beginning the first monthly billing cycle after June 30, 2026.
- A reconciliation (review) will occur two times each year to reflect your seasonal
  from May through October and November through April, with any adjustments o
- Your monthly bill is based on your estimated average energy use for that curren
  season; your actual energy use is compared with the actual amount billed unde
  Billing Plan will be adjusted up or down for any difference.
- You will continue to have the option to opt out at any time without penalty if you
- Your total bill will still depend on how much energy you use and broader market

Because you have received LIHEAP assistance, you will be automatically enrolled in
beginning the first billing cycle after June 30, 2026. If you do not wish to be enrolled
one of the following ways:

- Complete the simple online form at NIPSCO.com/LevelizedBilling
- Email us at LevelizedBilling@nisource.com
- Return the attached document in the prepaid envelope provided
- Call us at 1-800-464-7726

Our Commitment to You

NIPSCO is working to implement these changes thoughtfully and transparently. We're updating our billing systems, improving customer communications, and continuing to connect customers with assistance programs and payment options when help is needed.

If you have questions about the Levelized Billing Plan, payment assistance, or how this law may affect you, we're here to help.

Thank you for be
providing safe, re

Sincerely,

NIPSCO Custom

New Name for a Familiar Plan:
Levelized Billing

We know higher energy costs have made it harder for many families—especially during very cold or very hot weather. The Indiana General Assembly recently passed a new law to help make energy bills more predictable. We're writing to explain an update to NIPSCO's Budget Plan and what it means for you.

What's changing
Indiana House Enrolled Act 1002 updated how utilities offer level monthly billing. Because of this law, **NIPSCO's Budget Plan will now be called Levelized Billing.**

Key Plan Updates

- **The Levelized Billing Plan is a 12-month plan for all customers.**
  Already on a 12-month Budget Plan?
  You'll stay enrolled-only the name is changing.
- **Currently on an 8-month Budget Plan?**
  Starting with billing cycles that begin after June 30, 2026, your account will move to 12-month Levelized Billing Plan.
- **No action is needed from you at this time.**

Customer Assistance for Residential Energy Program

The NIPSCO Customer Assistance for Residential Energy Program (CARE) is implemented through participating local agencies in each county under the Indiana Housing and Community Development Authority (IHCDA).

SUMMER CARE PROGRAM

- The Commission approved NIPSCO's summer assistance program in NIPSCO's most recent rate case. Similar to the Gas Winter Care Program, eligible LIHEAP Customers are automatically enrolled in Summer Care, which will provide a discount on usage from June to September.
- NIPSCO funded the program with a **$1.5M of shareholder contribution** and has developed an option for customers to contribute $0.25/meter per month to increase the program funding.
- The program will begin applying discounts in June 2026.
- **To comply with HEA 1002**, in July 2026, NIPSCO will begin including a monthly notice on customers bills informing them that NIPSCO offers a low-income customer assistance program.

SUMMER DISCONNECT MORATORIUM

- NIPSCO voluntarily delays disconnection for nonpayment of electric service if temperatures are above 90° on the scheduled day of disconnection or are forecasted to be above 90° the following two days.
- **NIPSCO will also comply with HEA 1002** and delay disconnection for nonpayment of electric service for LIHEAP eligible customers on any day, not earlier than 48 hours in advance, a heat index of at least 95° for a county or part of a county is forecasted.



QUESTIONS?

NIPSCO
A NiSource Company



APPENDIX

Biggest Changes Since Five Years Ago

Safety and Reliability	**Investments that improve the safety of electric and gas systems and modernization of electric and gas assets to improve on demand deliverability to customers** i.e.: AMI – Improves visibility for our system and customers through remotely read meters. Leads to improved outage response times and load forecasting. Distribution Automation – Reduces impact of electric outages. Upgrade of Marktown Substation which supports several large industrial customers. Upgrade of 600# gas loop to improve the reliability of gas transmission and distribution systems. Replacement of Gary Bare Steel distribution system.
MISO	**Midcontinent Independent System Operator required investments** i.e.: This segment of work includes 345kV and 765kV system upgrades and MISO LRTP Tranche 1 investments.
Renewables	**Expanding renewable energy generation within NIPSCO** i.e.: This category includes Wind, Solar and Battery Storage.
Public Improvement	**Investments required to support mandatory relocation of gas and electric assets to support municipalities and DOT.** i.e.: Relocation of poles and lines or underground gas assets to support roundabout construction, bridge expansions, city sewer line installs, etc.
Maintenance	**Investments to replace failed assets or assets nearing, at, or past end of life expectations** i.e.: Pole Life Extension Program – Replace end of life structures, preventing outages, while also extending the life of those still in good condition. Power Transformer Replacements – Replace poor condition transformers with new modern equivalents, preventing large source outages while also improving asset health data. Underground cable replacement program to address aging distribution assets. Gas transmission and distribution mains including pipe, pipe fittings, pressure control fittings, steel services, valves, casings, and cathodic protection equipment, as well as improvements to aging stations.
Growth	**Investments targeted to support increased demand and ability to deliver utility services to customers** i.e.: Circuit Reconductors – Upgrade conductors to accommodate new loads and improve system reliability through new outage restoration opportunities. New Substations – Build new electric substations and circuits to serve new loads and create system capacity for reliability. Installation of new gas distribution stations and pipeline including increased volumetric delivery. New gas service provided to over 34,000 rural customers and over 44,000 non-rural customers.

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 196
NIPSCO 2026 Planning Reserve Margin Report

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC FOR DETERMINATION THAT CERTAIN INFORMATION CONTAINED IN ITS REPORT TO BE SUBMITTED TO THE COMMISSION PURSUANT TO IND. CODE § 8-1-8.5-13 IS CONFIDENTIAL AND EXEMPT FROM DISCLOSURE PURSUANT TO 170 IAC 1-1.1-4, IND. CODE § 8-1-2-29 AND IND. CODE § 5-14-3-4.	)	**CAUSE NO.** 46402

PETITIONER'S SUBMISSION OF REDACTED REPORTS

Northern Indiana Public Service Company LLC, by counsel, respectfully submits the attached redacted reports filed pursuant to Ind. Code § 8-1-8.5-13.

Respectfully submitted,

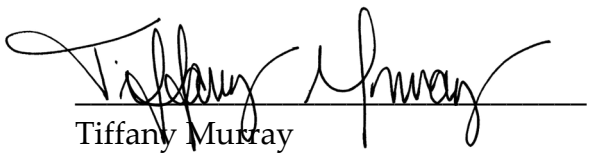
Tiffany Murray (No. 29996-49)
NiSource Corporate Service – Legal
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Indianapolis, Indiana 46204
Phone: 317.649-6424
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Email: tiffanymurray@nisource.com

Attorney for Petitioner
Northern Indiana Public Service Company LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served via email transmission upon Abby Gray and Carol Sparks Drake, Indiana Office of Utility Consumer Counselor, 115 W. Washington Street, Suite 1500 South, Indianapolis, Indiana 46204 (agray@oucc.in.gov, cadrake@oucc.in.gov, infomgt@oucc.in.gov).

Dated this 1st day of May, 2026.



Tiffany Murray

IC 8-1-8.5-13(i) Reporting Form - Planning Resource Year 1 (2026 to 2027)

Indiana Utility Regulatory Commission

Add rows below as necessary. For resources located outside of Zone 6, please provide a description of the deliverability arrangements.
For demand response resources, please provide a description of each program.

Owned Resource *IC 8-1-8.5-13(i)(1) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Fall UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Spring UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
CIN.SUCRKGT1	175	166.5	155.7	123.8	181.2	Zone 6	Gas	This is one combined asset.
CIN.SUCRKGT2	175	170.5	159.7	147.6	183.1	Zone 6	Gas	
CIN.SUCRKST1	228	218.6	196.1	172.1	227.3	Zone 6	Waste Heat	
NIPS.MICHCP12	469	309	254	213.4	291	Zone 6	Coal	
NIPS.NORWAPNOR	4	1.4	0.7	2.2	3.3	Zone 6	Water	
NIPS.OAKDAPOAK	6	1.3	0	2.1	4.2	Zone 6	Water	
NIPS.ROSEWRWF	100.1	16.7	11	27.2	20.6	Zone 6	Wind	This is a tax equity joint venture w/ NIPSCO as controlling member
NIPS.INCROSWF	300.1	49.1	30.2	75.1	58.8	Zone 6	Wind	This is a tax equity joint venture w/ NIPSCO as controlling member
NIPS.SCHAHP16A	78	47.2	53.7	58.4	73	Zone 6	Gas	
NIPS.SCHAHP16B	77	56.4	52	68.1	63.9	Zone 6	Gas	
NIPS.DUNNBR1SF	265	178.4	120.7	3.3	145	Zone 6	Solar	This is a tax equity joint venture w/ NIPSCO as controlling member
NIPS.INCRMLSP	200	129.1	88.7	1.9	110.9	Zone 6	Solar	This is a tax equity joint venture w/ NIPSCO as controlling member.
NIPS.DUNNBR2SF	435	263.3	217.5	21.8	247.1	Zone 6	Solar	
NIPS.DUNNBR2BS	56.25	54.9	53.8	53.1	56.3	Zone 6	Battery	
CIN.NIPS.FRBNK	250	158.2	125	12.5	125	Zone 6	Solar	
CIN.NIPS.GBSNS	200	100	100	10	100	Zone 6	Solar	
NIPS.CAVALRYSF	200	134.4	86.3	2.8	119.2	Zone 6	Solar	
NIPS.CAVALRYBS	45	44.4	45	44.8	31.2	Zone 6	Battery	

Contracted Resource *IC 8-1-8.5-13(i)(2) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Fall UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Spring UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
[redacted]								
								Capacity from external resource zone
								Capacity from external resource zone
								Capacity from external resource zone
								Capacity from external resource zone (allocations to Alphabet)

Demand Response Resource *IC 8-1-8.5-13(i)(3) definition*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Fall UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Spring UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Additional Comments**
					Please see below, where NIPSCO has broken this out to account for Rate 831 Tier 2 and 3.

NIPSCO 631 Tier 2 & 3 Customers Contracted Resource	**Summer UCAP (ZRC)**	**Fall UCAP (ZRC)**	**Winter UCAP (ZRC)**	**Spring UCAP (ZRC)**	**Additional Comments**
A	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
B	0	0	0	0	Load Purchase Capacity (ZRC)
C	172.4	150.7	179.9	199.2	Load Purchase Capacity (ZRC) by Customer
D	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
E	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
F	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
G	0	0	0	0	Load Purchase Capacity (ZRC) by Customer

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NIPSCO 631 Tier 2 & 3 Customers Load Modiying Resource	Summer Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Fall Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Winter Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Spring Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Additional Comments
A	217.8	193.2	201.5	220.3	Registered as LMR @ MISO by NIPSCO
B	0.0	0.0	0.0	0.0	Registered as LMR @ MISO by NIPSCO
C	0.0	0.0	0.0	0.0	Registered as LMR @ MISO by NIPSCO
D	79.7	81.9	87.2	88.0	Registered as LMR @ MISO by NIPSCO
E	0.0	0.0	0.0	0.0	Registered as LMR @ MISO by NIPSCO
F	75.8	83.5	96.4	96.9	Registered as LMR @ MISO by NIPSCO
G	107.4	193.4	187.0	226.5	Registered as LMR @ MISO by NIPSCO

		This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
RTO established Planning Reserve Margin requirement *(see IC 8-1-8.5-13 (i)(4)*	Summer Demand ___ MWx(1+ % PRM ____) ____MW	2596	3436.2	w/ TL of 2.5% PRMR of 7.9%

NIPSCO has peformed this calculation without Rate 631 Tier 2 and 3 customers (column D) and with those customers (column E)

Fall Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	2408.1	3279.8	w/ TL of 1.6% PRMR of 11.6%

Winter Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	2049.1	2974.8	w/ TL of 2.1% PRMR of 18.9%

Spring Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	2704.8	3499.0	w/ TL of 2.7% PRMR of 23.4%

Please describe any other federal reliability requirement:	

Reliability Adequacy Metrics *[defined in IC 8-1-8.5-13(e)]*			
Summer RA Metric *IC 8-1-8.5-13(e)(1)*	**Fall RA Metric** *IC 8-1-8.5-13(e)(2)*	**Winter RA Metric** *IC 8-1-8.5-13(e)(2)*	**Spring RA Metric** *IC 8-1-8.5-13(e)(2)*
Summer UCAP/PRM Requirement _____%	Fall UCAP/PRM Requirement _____%	Winter UCAP/PRM Requirement _____%	Spring UCAP/PRM Requirement _____%

NIPSCO has peformed this calculation (below) without Rate 631 Tier 2 and 3 customers (columns B and C) and with those customers (column D and E)

This minus Rate 631 Tier 2 & 3 Customers				This with Rate 631 Tier 2 & 3 Customers			
Summer UCAP	Fall UCAP	Winter UCAP	Spring UCAP	Summer UCAP	Fall UCAP	Winter UCAP	Spring UCAP
[redacted]							
Summer RA Metric	Fall RA Metric	Winter RA Metric	Spring RA Metric	Summer RA Metric	Fall RA Metric	Winter RA Metric	Spring RA Metric
[redacted]							

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IC 8-1-8.5-13(i) Reporting Form - Planning Resource Year 2 (2027 to 2028)

Indiana Utility Regulatory Commission

Add rows below as necessary. For resources located outside of Zone 6, please provide a description of the deliverability arrangements.
For demand response resources, please provide a description of each program.

Owned Resource *IC 8-1-8.5-13(i)(1) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Fall UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Spring UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
CIN.SUCRKGT1	175	163.7	153.7	147.8	175.2	Zone 6	Gas	This is one combined asset.
CIN.SUCRKGT2	175	167.7	157.7	178.5	176.2	Zone 6	Gas	
CIN.SUCRKST1	228	218.6	196.1	172.1	227.3	Zone 6	Waste Heat	
NIPS.MICHCP12	469	309	254	213.4	291	Zone 6	Coal	
NIPS.NORWAPNOR	4	1.4	0.7	2.2	3.3	Zone 6	Water	
NIPS.OAKDAPOAK	6	1.3	0	2.1	4.2	Zone 6	Water	
NIPS.ROSEWRWF	100.1	16.7	11	27.2	20.6	Zone 6	Wind	This is a tax equity joint venture w/ NIPSCO as controlling member
NIPS.INCROSWF	300.1	49.1	30.2	75.1	58.8	Zone 6	Wind	This is a tax equity joint venture w/ NIPSCO as controlling member
NIPS.SCHAHP16A	78	47.2	53.7	58.4	73	Zone 6	Gas	
NIPS.SCHAHP16B	77	56.4	52	68.1	63.9	Zone 6	Gas	
NIPS.DUNNBR1SF	265	178.4	120.7	3.3	145	Zone 6	Solar	This is a tax equity joint venture w/ NIPSCO as controlling member.
NIPS.INCRMLSP	200	129.1	88.7	1.9	110.9	Zone 6	Solar	This is a tax equity joint venture w/ NIPSCO as controlling member.
NIPS.DUNNBR2SF	435	263.3	217.5	21.8	247.1	Zone 6	Solar	
NIPS.DUNNBR2BS	56.25	54.9	53.8	53.1	56.3	Zone 6	Battery	
CIN.NIPS.FRBNK	250	158.2	125	12.5	125	Zone 6	Solar	
CIN.NIPS.GBSNS	200	100	100	10	100	Zone 6	Solar	
NIPS.CAVALRYSF	200	134.4	86.3	2.8	119.2	Zone 6	Solar	
NIPS.CAVALRYBS	45	44.4	45	44.8	31.2	Zone 6	Battery	
Peaker	408			325.3	380.3	Zone 6	Gas	
Mitchell BESS	300				285	Zone 6	Battery	Alphabet/Amazon

Contracted Resource *IC 8-1-8.5-13(i)(2) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Fall UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Spring UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
[redacted]								
								Capacity from external resource zone
								Capacity from external resource zone (allocations to Alphabet/Amazon)
								Alphabet
								dentified Resource, Market Capacity Purchase opportunity

Demand Response Resource *IC 8-1-8.5-13(i)(3) definition*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Fall UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Spring UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Additional Comments**
					Please see below, where NIPSCO has broken this out to account for Rate 631 Tier 2 and 3.

NIPSCO 631 Tier 2 & 3 Customers Contracted Resource	**Summer UCAP (ZRC)**	**Fall UCAP (ZRC)**	**Winter UCAP (ZRC)**	**Spring UCAP (ZRC)**	**Additional Comments**
A	0	0	0	0	Load Purchase Capacity (ZRC)
B	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
C	172.4	150.7	179.9	199.2	Load Purchase Capacity (ZRC) by Customer
D	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
E	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
F	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
G	0	0	0	0	Load Purchase Capacity (ZRC) by Customer

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NIPSCO 631 Tier 2 & 3 Customers Load Modiying Resource	Summer Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Fall Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Winter Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Spring Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Additional Comments
A	217.8	193.2	201.5	220.3	Registered as LMR @ MISO by NIPSCO
B	0.0	0.0	0.0	0.0	Registered as LMR @ MISO by NIPSCO
C	0.0	0.0	0.0	0.0	Registered as LMR @ MISO by NIPSCO
D	79.7	81.9	87.2	88.0	Registered as LMR @ MISO by NIPSCO
E	0.0	0.0	0.0	0.0	Registered as LMR @ MISO by NIPSCO
F	75.8	83.5	96.4	96.9	Registered as LMR @ MISO by NIPSCO
G	107.4	193.4	187.0	226.5	Registered as LMR @ MISO by NIPSCO

		This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
RTO established Planning Reserve Margin requirement *(see IC 8-1-8.5-13 (i)(4)*	Summer Demand ___ MWx(1+ % PRM ____) ____MW	2795.5	3635.7	w/ TL of 2.5% PRMR of 7.9%

NIPSCO has peformed this calculation without Rate 631 Tier 2 and 3 customers (column D) and with those customers (column E)

Fall Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	2922.8	3794.6	w/ TL of 1.6% PRMR of 11.6%

Winter Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	2827.9	3753.6	w/ TL of 2.1% PRMR of 18.9%

Spring Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	3577.2	4563.8	w/ TL of 2.7% PRMR of 23.4%

Please describe any other federal reliability requirement:	

Reliability Adequacy Metrics *[defined in IC 8-1-8.5-13(e)]*			
Summer RA Metric *IC 8-1-8.5-13(e)(1)*	**Fall RA Metric** *IC 8-1-8.5-13(e)(2)*	**Winter RA Metric** *IC 8-1-8.5-13(e)(2)*	**Spring RA Metric** *IC 8-1-8.5-13(e)(2)*
Summer UCAP/PRM Requirement _____%	Fall UCAP/PRM Requirement _____%	Winter UCAP/PRM Requirement _____%	Spring UCAP/PRM Requirement _____%

NIPSCO has peformed this calculation (below) without Rate 631 Tier 2 and 3 customers (columns B and C) and with those customers (column D and E)

This minus Rate 631 Tier 2 & 3 Customers				This with Rate 631 Tier 2 & 3 Customers			
Summer UCAP	Fall UCAP	Winter UCAP	Spring UCAP	Summer UCAP	Fall UCAP	Winter UCAP	Spring UCAP
[redacted]							
Summer RA Metric	Fall RA Metric	Winter RA Metric	Spring RA Metric	Summer RA Metric	Fall RA Metric	Winter RA Metric	Spring RA Metric

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IC 8-1-8.5-13(i) Reporting Form - Planning Resource Year 3 (2028 to 2029)

Indiana Utility Regulatory Commission

Add rows below as necessary. For resources located outside of Zone 6, please provide a description of the deliverability arrangements.
For demand response resources, please provide a description of each program.

Owned Resource *IC 8-1-8.5-13(i)(1) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Fall UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Spring UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
CIN.SUCRKGT1	175	163.7	153.7	147.8	175.2	Zone 6	Gas	This is one combined asset.
CIN.SUCRKGT2	175	167.7	157.7	178.5	176.2	Zone 6	Gas	
CIN.SUCRKST1	228	218.6	196.1	172.1	227.3	Zone 6	Waste Heat	
NIPS.MICHCP12	469	309	254			Zone 6	Coal	
NIPS.NORWAPNOR	4	1.4	0.7	2 2	3.3	Zone 6	Water	
NIPS.OAKDAPOAK	6	1.3	0	2.1	4.2	Zone 6	Water	
NIPS.ROSEWRWF	100.1	8.6	14.4	23	15	Zone 6	Wind	This is a tax equity joint venture w/ NIPSCO as controlling member
NIPS.INCROSWF	300.1	25.8	43.2	69	45	Zone 6	Wind	This is a tax equity joint venture w/ NIPSCO as controlling member
NIPS.SCHAHP16A	78	47.2	53.7			Zone 6	Gas	
NIPS.SCHAHP16B	77	56.4	52			Zone 6	Gas	
NIPS.DUNNBR1SF	265	63.6	36	23.3	37.6	Zone 6	Solar	This is a tax equity joint venture w/ NIPSCO as controlling member.
NIPS.INCRMLSP	200	48	27.2	17.6	28.4	Zone 6	Solar	This is a tax equity joint venture w/ NIPSCO as controlling member.
NIPS.DUNNBR2SF	435	104.4	59.2	38.3	61.8	Zone 6	Solar	
NIPS.DUNNBR2BS	56.25	44.4	53.2	50.5	53.7	Zone 6	Battery	
CIN.NIPS.FRBNK	250	60	34	22	35.5	Zone 6	Solar	
CIN.NIPS.GBSNS	200	48	27.2	17.6	28.4	Zone 6	Solar	
NIPS.CAVALRYSF	200	48	27.2	17.6	28.4	Zone 6	Solar	
NIPS.CAVALRYBS	45	35.6	42.6	40.4	42.9	Zone 6	Battery	
Peaker	408	334.7	325.1	315.4	302.1	Zone 6	Gas	
Peaker CT1	385				246.4	Zone 6	Gas	Amazon
Peaker CT2	385				246.4	Zone 6	Gas	Amazon
MITCHELL BESS	500	395	473	449	477	Zone 6	Battery	Amazon & Alphabet
Tipton BESS	167	131.9	158.0	150.0	159.3	Zone 6	Battery	Alphabet
Templeton Wind	200	17.2	28.8	46	30	Zone 6	Wind	

Contracted Resource *IC 8-1-8.5-13(i)(2) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f)*	**Fall UCAP (MW)** *IC 8-1-8.5-13(f)*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g)*	**Spring UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
[redacted]								
								Capacity from external resource zone
								Capacity from external resource zone - (allocations to Amazon/Alphabet)
								Alphabet
								Identified Resource, Market Capacity Purchase opportunity

Demand Response Resource *IC 8-1-8.5-13(i)(3) definition*	**Summer UCAP (MW)** *IC 8-1-8.5-13(f) definition*	**Fall UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Winter UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Spring UCAP (MW)** *IC 8-1-8.5-13(g) definition*	**Additional Comments**
					Please see below, where NIPSCO has broken this out to account for Rate 631 Tier 2 and 3.

NIPSCO 631 Tier 2 & 3 Customers Contracted Resource	**Summer UCAP (ZRC)**	**Fall UCAP (ZRC)**	**Winter UCAP (ZRC)**	**Spring UCAP (ZRC)**	**Additional Comments**
A	0	0	0	0	Load Purchase Capacity (ZRC)
B	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
C	172.4	150.7	179.9	199.2	Load Purchase Capacity (ZRC) by Customer
D	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
E	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
F	0	0	0	0	Load Purchase Capacity (ZRC) by Customer
G	0	0	0	0	Load Purchase Capacity (ZRC) by Customer

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NIPSCO 631 Tier 2 & 3 Customers Load Modiying Resource	Summer Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Fall Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Winter Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Spring Registered As LMR @ MISO (ZRC) (MW X (1+PRM) X (1+TL))	Additional Comments
A	217.8	193.2	201.5	220.3	Registered as LMR @ MISO by NIPSCO
B	0.0	0.0	0.0	0 0	Registered as LMR @ MISO by NIPSCO
C	0.0	0.0	0.0	0 0	Registered as LMR @ MISO by NIPSCO
D	79.7	81.9	87.2	88.0	Registered as LMR @ MISO by NIPSCO
E	0.0	0.0	0.0	0 0	Registered as LMR @ MISO by NIPSCO
F	75.8	83.5	96.4	96.9	Registered as LMR @ MISO by NIPSCO
G	107.4	193.4	187.0	226.5	Registered as LMR @ MISO by NIPSCO

		This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
RTO established Planning Reserve Margin requirement *(see IC 8-1-8.5-13 (i)(4)*	Summer Demand ___ MWx(1+ % PRM ____) ____MW	3546.1	4343.7	w/ TL of 2 5% PRMR of 2.4%

NIPSCO has peformed this calculation without Rate 631 Tier 2 and 3 customers (column D) and with those customers (column E)

Fall Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	3703.4	4549.5	w/ TL of 1 6% PRMR of 6%

Winter Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	3449.1	4271.3	w/ TL of 2.1% PRMR of 6%

Spring Demand ___ MWx(1+ % PRM ____) ____MW	This minus Rate 631 Tier 2 & 3 Customers	This with Rate 631 Tier 2 & 3 Customers	Additional Comments
	3747.7	4560.7	w/ TL of 2.7% PRMR of 1%

Please describe any other federal reliability requirement:	

Reliability Adequacy Metrics *[defined in IC 8-1-8 5-13(e)]*			
Summer RA Metric *IC 8-1-8.5-13(e)(1)*	**Fall RA Metric** *IC 8-1-8.5-13(e)(2)*	**Winter RA Metric** *IC 8-1-8.5-13(e)(2)*	**Spring RA Metric** *IC 8-1-8.5-13(e)(2)*
Summer UCAP/PRM Requirement _____%	Fall UCAP/PRM Requirement _____%	Winter UCAP/PRM Requirement _____%	Spring UCAP/PRM Requirement _____%

NIPSCO has peformed this calculation (below) without Rate 631 Tier 2 and 3 customers (columns B and C) and with those customers (column D and E)

This minus Rate 631 Tier 2 & 3 Customers				This with Rate 631 Tier 2 & 3 Customers			
Summer UCAP	Fall UCAP	Winter UCAP	Spring UCAP	Summer UCAP	Fall UCAP	Winter UCAP	Spring UCAP
Summer RA Metric	Fall RA Metric	Winter RA Metric	Spring RA Metric	Summer RA Metric	Fall RA Metric	Winter RA Metric	Spring RA Metric

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IC § 8-1-8.5-13(n)(2) requires the following:

(2) With respect to a report submitted to the commission after December 31, 2025, the amount of generating resource capacity or energy, or both, that the public utility plans to retire and that is owned and operated by the public utility and used to provide retail electric service in Indiana, including the:

(A) capacity;
(B) location;
(C) fuel source; and
(D) planned retirement date;
for each electric generating facility. The public utility must include information as to whether the planned retirement is required in order to comply with environmental laws, regulations, or court orders, including consent decrees, that are or will be in effect at the time of the planned retirement. In addition, the public utility must provide its economic rationale for the planned retirement, including anticipated ratepayer impacts, and information concerning the public utility's plan or plans with respect to the amount of replacement capacity identified to provide approximately the same accredited capacity within the appropriate regional transmission organization as the amount of capacity of the facility to be retired.

Schahfer Units 16A & 16B

(A) Capacity: 78MW + 77 MW
(B) Location: 2723E 1500N Wheatfield, IN 46392
(C) Fuel source: Gas
(D) Planned retirement date: December 2028

The preferred portfolios in NIPSCO's 2018, 2021, and 2024 IRPs reflect retirement of Schahfer Units 16A & 16B shortly after Schafer's coal units were set to retire. The economic rationale for the retirement of Schahfer Units 16A & 16B is the age of the units and their inefficient heat rates. No specific environmental laws, regulations, court orders, or consent decrees are driving the retirement of Schahfer Units 16A & 16B; the age of the units and their heat rate are the primary drivers of retirement. This capacity is intended to be replaced by a new (more efficient) gas peaker project that would be 40-50% more efficient in its heat rate. The anticipated ratepayer impact of the new gas peaker at Schahfer was identified in the proceeding in which the project was granted a CPCN, Cause No. 45967, and the project is subject to ongoing review in NIPSCO's GCT tracker.

IC § 8-1-8.5-13(n)(2) requires the following:

(2) With respect to a report submitted to the commission after December 31, 2025, the amount of generating resource capacity or energy, or both, that the public utility plans to retire and that is owned and operated by the public utility and used to provide retail electric service in Indiana, including the:

(A) capacity;
(B) location;
(C) fuel source; and
(D) planned retirement date;
for each electric generating facility. The public utility must include information as to whether the planned retirement is required in order to comply with environmental laws, regulations, or court orders, including consent decrees, that are or will be in effect at the time of the planned retirement. In addition, the public utility must provide its economic rationale for the planned retirement, including anticipated ratepayer impacts, and information concerning the public utility's plan or plans with respect to the amount of replacement capacity identified to provide approximately the same accredited capacity within the appropriate regional transmission organization as the amount of capacity of the facility to be retired.

Michigan City Unit 12

(A) Capacity : 469MW
(B) Location: 101 Wabash St, Michigan City, IN 46360
(C) Fuel source: Coal
(D) Planned retirement date: December 2028

The preferred portfolios in NIPSCO's 2018, 2021, and 2024 IRPs reflect retirement of Michigan City Unit 12 and replacement of that capacity with a combination of wind, solar, energy storage, and gas peaking resources. The preferred portfolios in NIPSCO's 2021 IRP and 2024 IRPs reflected a 2028 retirement year. As stated in those IRPs, the economic rationale for this retirement decision was impacted by:

1) Production Tax Credits and Investment Tax Credits (now either repealed or restricted by the federal One Big Beautiful Bill enacted in 2025)

2) Expectation of EPA Green House Gas rule 111b, which was expected to require 90% carbon capture for coal units to be in effect by 2030 and would have added significant compliance costs for continued operation. In June 2025, EPA proposed a rule change in which the agency withdraws its prior conclusions that carbon capture and sequestration/storage and natural gas co-firing are "adequately demonstrated," commercially available and cost-effective systems of emission reduction to reduce GHG emissions.

As of today, the two environmental laws and tax regulations listed above have been repealed/restricted. NIPSCO's 1520 report contains information concerning potential replacement capacity options NIPSCO is exploring to provide approximately the same accredited capacity as the amount of capacity of the facility to be retired. Any anticipated ratepayer impact will be available when the replacement capacity resource is selected.

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 197
CenterPoint 2026 Planning Reserve Margin Report

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A CENTERPOINT ENERGY INDIANA SOUTH ("CEI SOUTH") FOR DETERMINATION THAT CERTAIN INFORMATION CONTAINED IN ITS REPORT TO BE SUBMITTED TO THE COMMISSION PURSUANT TO IND. CODE § 8-1-8.5-13 AND 170 IAC 4-7-2.3 IS CONFIDENTIAL AND EXEMPT FROM DISCLOSURE PURSUANT TO 170 IAC 1-1.1-4, IND. CODE § 8-1-2-29 AND IND. CODE § 5-14-3-4.	**CAUSE NO. 46403**

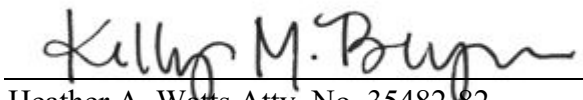
SUBMISSION OF CENTERPOINT ENERGY INDIANA SOUTH'S 2026 HEA 1520 REPORT

In accordance with Indiana Code § 8-1-8.5-13 and the Commission's May 7, 2026 Docket Entry in this Cause, Petitioner Southern Indiana Gas and Electric Company, Inc. d/b/a CenterPoint Energy Indiana South ("CEI South") hereby provides the public redacted version of its 2026 HEA 1520 Report.

(Signature Page Follows)

DATED: May 7, 2026

Respectfully submitted,
SOUTHERN INDIANA GAS AND ELECTRIC COMPANY
D/B/A CENTERPOINT ENERGY INDIANA SOUTH

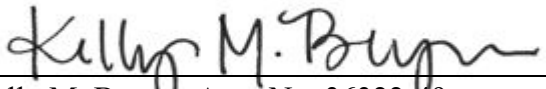


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CERTIFICATE OF SERVICE

I certify that on May 7, 2026, this document was filed with the Indiana Utility Regulatory Commission using the Commission's electronic filing system and was served electronically on the parties below.

Indiana Office of Utility Consumer Counselor
115 West Washington Street, Suite 1500 South
Indianapolis, IN 46204
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Kelly M. Beyrer, Atty. No. 36322-49

IC 8-1-8.5-13(l) Reporting Form - Planning Resource Year 1 (2026 to 2027)

Indiana Utility Regulatory Commission

Add rows below as necessary. For resources located outside of Zone 6, please provide a description of the deliverability arrangements.
For demand response resources, please provide a description of each program.

Owned Resource *IC 8-1-8.5-13(l)(1) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
AB Brown 3	80	67.8	70.1	88	71.7	MISO Zone 6	Gas/Fuel Oil	Primary fuel is natural gas but can operate on fuel oil
AB Brown 4	80	71.1	74.6	85.7	78.3	MISO Zone 6	Gas	-
AB Brown 5	232.3	201.9	208.3	198.2	210.9	MISO Zone 6	Natural Gas	-
AB Brown 6	232.3	153.5	206.3	198.2	208.2	MISO Zone 6	Natural Gas	-
FB Culley 2	90	0	0	0	0	MISO Zone 6	Coal	The current DOE 202c Order expires 6/21/2026; and requires the unit operate as an energy-only resource. Absent an extension of the DOE 202c Order, the MISO-approved suspension of FBC2 will begin on June 22, 2026.
FB Culley 3	270	196.4	206.7	207	230.6	MISO Zone 6	Coal	
OVEC (Ohio Valley Electric Corp.)	32.2	29.3	30.1	30.9	30.9	MISO External Zone 23	Coal	CEI South owns 1.5% share of OVEC's total capacity. OVEC is located in MISO external zone 23, and is interconnected through the transmission provider LGEE (Louisville Gas & Electric) to SIGE with Transmission Service Request reference #4931291.
Troy Solar	50	31.1	24.2	0.7	27.4	MISO Zone 6	Solar	
Posey Solar	191	136.9	95.4	9.5	95.4	MISO Zone 6	Solar	
Oak Hill Solar	2	0	0	0	0	MISO Zone 6	Solar	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Volkman Rd Solar	2	0	0	0	0	MISO Zone 6	Solar	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Volkman Road Battery	1	0	0	0	0	MISO Zone 6	BESS	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Blackfoot Landfill	3.2	0	0	0	0	MISO Zone 6	LFG	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.

Contracted Resource *IC 8-1-8.5-13(l)(2) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
Benton County Wind Farm	[redacted]					MISO Zone 6	Wind	
Fowler Wind Farm						MISO Zone 6	Wind	
Wheatland Solar						MISO Zone 6	Solar	
Galesburg Wind						MISO Zone 4	Wind	
Salt Creek Wind						MISO Zone 3	Wind	
Aggregator						MISO Zone 6	N/A	
Capacity Contracts						[redacted]		
Total Contracted Resources		286	293	291	320			

Demand Response Resource *IC 8-1-8.5-13(l)(3) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
DR-DLC-Thermostats	10.4	6	0	0	Program utilizes smart thermostats to curtail residential central air conditioner load during hours of system peak demand. This DR is only available in summer months per CEI South tariff

Resource Retirements *IC 8-1-8.5-13(i) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
N/A					

Refueled Resources *IC 8-1-8.5-13(g) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
N/A					

RTO established Planning Reserve Margin requirement[1] *(see IC 8-1-8.5-13 (f))*	1,106	973.8	915	990.5

Please describe any other federal reliability requirement:	

Reliability Adequacy Metrics *[defined in IC 8-1-8.5-13(h)]*			
Summer RA Metric	**Winter RA Metric**	**Spring RA Metric**	**Fall RA Metric**
107%	125%	121%	129%

1. CEI South PRMR as of March 25, 2026, as provided by MISO, and consistent with the prior 1520 reports

IC 8-1-8.5-13(l) Reporting Form - Planning Resource Year 1 (2027 to 2028)

Indiana Utility Regulatory Commission

Add rows below as necessary. For resources located outside of Zone 6, please provide a description of the deliverability arrangements.
For demand response resources, please provide a description of each program.

Owned Resource *IC 8-1-8.5-13(l)(1) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
AB Brown 3	80	67.4	72.1	91.7	75.8	MISO Zone 6	Gas/Fuel Oil	Primary fuel is natural gas but can operate on fuel oil
AB Brown 4	80	70.5	67.3	89.2	80.3	MISO Zone 6	Gas	-
AB Brown 5	232.3	209.1	195.1	183.5	195.1	MISO Zone 6	Natural Gas	-
AB Brown 6	232.3	209.1	195.1	183.5	195.1	MISO Zone 6	Natural Gas	-
FB Culley 3	270	181.4	248.8	231.6	269.6	MISO Zone 6	Coal	
OVEC (Ohio Valley Electric Corp.)	32.2	29.5	30.4	31.2	30.8	MISO External Zone 23	Coal	CEI South owns 1.5% share of OVEC's total capacity. OVEC is located in MISO external zone 23, and is interconnected through the transmission provider LGEE (Louisville Gas & Electric) to SIGE with Transmission Service Request reference #4931291.
Troy Solar	50	22.3	17.5	12.8	23.4	MISO Zone 6	Solar	
Posey Solar	191	85.0	66.8	48.7	89.2	MISO Zone 6	Solar	
Oak Hill Solar	2	0	0	0	0	MISO Zone 6	Solar	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Volkman Rd Solar	2	0	0	0	0	MISO Zone 6	Solar	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Volkman Road Battery	1	0	0	0	0	MISO Zone 6	BESS	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Blackfoot Landfill	3.2	0	0	0	0	MISO Zone 6	LFG	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.

Contracted Resource *IC 8-1-8.5-13(l)(2) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
Benton County Wind Farm	[redacted]					MISO Zone 6	Wind	
Fowler Wind Farm						MISO Zone 6	Wind	
Wheatland Solar						MISO Zone 6	Solar	
Galesburg Wind						MISO Zone 4	Wind	
Salt Creek Wind						MISO Zone 3	Wind	
Aggregator						MISO Zone 6	N/A	
Capacity Contracts								
Total Contracted Resources		326	353	333	352			

Demand Response Resource *IC 8-1-8.5-13(l)(3) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
DR-DLC-Thermostats	10.5	6	0	0	

Resource Retirements *IC 8-1-8.5-13(i) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
N/A					

Refueled Resources *IC 8-1-8.5-13(g) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
N/A					

RTO established Planning Reserve Margin requirement[1] *(see IC 8-1-8.5-13 (f))*	1,111	970	910	998

Please describe any other federal reliability requirement:	

Reliability Adequacy Metrics *[defined in IC 8-1-8.5-13(h)]*			
Summer RA Metric	**Winter RA Metric**	**Spring RA Metric**	**Fall RA Metric**
109%	129%	132%	131%

1. CEI South PRMR as of April 21, 2026, as provided by MISO in OMS Survey

IC 8-1-8.5-13(l) Reporting Form - Planning Resource Year 1 (2028-2029)

Indiana Utility Regulatory Commission

Add rows below as necessary. For resources located outside of Zone 6, please provide a description of the deliverability arrangements.
For demand response resources, please provide a description of each program.

Owned Resource *IC 8-1-8.5-13(l)(1) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
AB Brown 3	80	62.6	65.8	82.9	64.6	MISO Zone 6	Gas/Fuel Oil	Primary fuel is natural gas but can operate on fuel oil
AB Brown 4	80	68.7	63.4	71.9	60.6	MISO Zone 6	Gas	-
AB Brown 5	232.3	204.4	197.5	148.7	191.7	MISO Zone 6	Natural Gas	-
AB Brown 6	232.3	204.4	197.5	148.7	191.7	MISO Zone 6	Natural Gas	-
FB Culley 3	270	186.8	245.4	200.6	229.8	MISO Zone 6	Coal	
OVEC (Ohio Valley Electric Corp.)	32.2	29.4	30.1	30.9	30.1	MISO External Zone 23	Coal	CEI South owns 1.5% share of OVEC's total capacity. OVEC is located in MISO external zone 23, and is interconnected through the transmission provider LGEE (Louisville Gas & Electric) to SIGE with Transmission Service Request reference #4931291.
Future Storage	90	54.9	79.2	76.5	84.2	MISO Zone 6	BESS	Identified in 2025 IRP Preferred Portfolio
Troy Solar	50	22.5	14.0	9.5	20.1	MISO Zone 6	Solar	
Posey Solar	191	85.9	53.5	36.3	77.0	MISO Zone 6	Solar	
Oak Hill Solar	2	0	0	0	0	MISO Zone 6	Solar	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Volkman Rd Solar	2	0	0	0	0	MISO Zone 6	Solar	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Volkman Road Battery	1	0	0	0	0	MISO Zone 6	BESS	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.
Blackfoot Landfill	3.2	0	0	0	0	MISO Zone 6	LFG	Located on CEI South distribution system and accounted for in peak load forecast. Not a SAC resource.

Contracted Resource *IC 8-1-8.5-13(l)(2) definition*	**ICAP (MW)** *Nameplate capacity*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Location:** *RTO interconnection zone*	**Fuel Source**	**Additional Comments**
Benton County Wind Farm	30	0.0	0.0	0.0	0.0	MISO Zone 6	Wind	
Fowler Wind Farm	50	4.0	7.5	11.5	11.6	MISO Zone 6	Wind	
Wheatland Solar	150	67.5	42.0	28.5	60.5	MISO Zone 6	Solar	
Galesburg Wind	147	11.8	22.1	33.8	34.0	MISO Zone 4	Wind	
Salt Creek Wind	170	13.6	25.5	39.1	39.3	MISO Zone 3	Wind	
Aggregator	N/A	25.4	26.3	26.4	25.3	MISO Zone 6	N/A	
Capacity Contracts	N/A	0	0	0	0	N/A	N/A	
Total Contracted Resources		122	123	139	171			

Demand Response Resource *IC 8-1-8.5-13(l)(3) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
DR-DLC-Thermostats	12	6	0	0	

Resource Retirements *IC 8-1-8.5-13(i) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
N/A					

Refueled Resources *IC 8-1-8.5-13(g) definition*	**Summer Accredited Capacity (MW)** *IC 8-1-8.5-13(k) definition*	**Fall Accredited Capacity (MW)** *IC 8-1-8.5-13(d) definition*	**Winter Accredited Capacity (MW)** *IC 8-1-8.5-13(l) definition*	**Spring Accredited Capacity (MW)** *IC 8-1-8.5-13(j) definition*	**Additional Comments**
N/A					

RTO established Planning Reserve Margin requirement[1] *(see IC 8-1-8.5-13 (f))*	1,117	971	905	1,007

Please describe any other federal reliability requirement:	

Reliability Adequacy Metrics *[defined in IC 8-1-8.5-13(h)]*			
Summer RA Metric	**Winter RA Metric**	**Spring RA Metric**	**Fall RA Metric**
94%	111%	104%	111%

1. CEI South PRMR as of April 21, 2026, as provided by MISO in OMS Survey

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 198
McFarlane Testimony

Tab C

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PREPARED DIRECT TESTIMONY OF SHAWN MCFARLANE

I. PROFESSIONAL BACKGROUND AND QUALIFICATIONS

Q. Please state your name, business address, and position with your employer.

A. My name is Shawn F. McFarlane. I am employed by the Midcontinent Independent System Operator, Inc. ("MISO"), which is located at 720 City Center Drive, Carmel, Indiana, 46032. My current position is Executive Director of Market Operations, which I have held since October 2015. During that time, I have had executive oversight of various functions under MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff ("Tariff"), including Resource Adequacy, Day-Ahead Energy and Operating Reserve Market, Auction Revenue Rights and Financial Transmission Rights markets, as well as the Forward Reliability Assessment Commitment, and Market and Transmission Settlements. I joined MISO in April of 2014 and served as Executive Director of Strategy through September 2015.

Q. Please briefly describe your educational and professional background before you joined MISO.

A. I hold a Bachelor of Science Degree in Petroleum Engineering at Pennsylvania State University and an MBA in Finance from Rutgers University. Prior to joining MISO, I was employed at Reliant Energy and successor companies from 1998-2013 as a Director and then as Vice President in various roles in Business Development, Commercial Analytics, and Wholesale Strategy in the merchant generation, energy trading, and retail energy marketing businesses. Prior to joining Reliant Energy, I was an Engagement Manager at a management consulting firm, McKinsey & Company, in their energy consultancy group from 1996-1998; in various finance

roles at Texaco, Inc. from 1990-1996; and, as a petroleum engineer in Southern California Gas Company's natural gas storage unit from 1985-1988.

Q. Please describe your job responsibilities as they relate to this filing.

A. As MISO's Executive Director of Market Operations, I have executive oversight of Resource Adequacy, including administration of MISO's Planning Resource Auction, within which accreditation of resources is a key parameter to better ensure that the Planning Reserve Margin Requirement and Planning Resource volumes are appropriately accurate to better ensure that resources are available to satisfy needs in real time. Additionally, accurate accreditation enables that cleared resources in the Planning Resource Auction are priced appropriately, based on their expected availability.

II. PURPOSE OF TESTIMONY AND RAN PROGRAM OVERVIEW

Q. What is the purpose of your testimony?

A. My testimony supports MISO's filing in this docket and provides operational and implementation detail associated with MISO's proposal.

III. SEASONAL RESOURCE ADEQUACY CONSTRUCT

Q. How does MISO propose to meet the challenges of the Reliability Imperative in this filing?

A. As discussed in Mr. Wright's Testimony, the Reliability Imperative is the term MISO uses to describe the shared responsibility of MISO, Load Serving Entities, and Relevant Electric Retail Regulatory Authorities to address the challenges that rapid fleet change, increased frequency and severity of extreme weather events, and other factors are posing to the reliability of the MISO Region. As part of

MISO's Market Redefinition efforts in response to the Reliability Imperative, MISO proposes Resource Adequacy enhancements in two primary areas: (1) establishing seasonal Resource Adequacy Requirements ("RAR); and (2) improving availability-based accreditation. These enhancements are designed to verify sufficient generation adequacy within each Season of the year and to provide the right incentives for resources to maintain system reliability. MISO will be submitting a separate, but related, Minimum Capacity Obligation proposal in another filing concurrent with this filing.

Q. Please describe MISO's current Resource Adequacy (RA) Construct.

A. In accordance with MISO's Resource Adequacy Tariff provisions contained in Module E-1, Market Participants representing Load Serving Entities ("LSEs") are expected to procure sufficient resources to meet their forecast coincident peak load, plus a reserve margin, for the upcoming Planning Year. A detailed description of the provisions of MISO's existing RAR, including the specific requirements established in Module E-1 of the Tariff, is included in the Testimony of Mr. Scott Wright.

Q. Why is MISO proposing to move to a seasonal RA construct with accreditation based on availability during times of need?

A. MISO is proposing to move to a seasonal RA construct so that it can better manage reliability risks brought about by the key trends impacting resource availability identified in 2018 as part of MISO's Resource Availability and Need

("RAN") initiative.[1] As described in the Testimony of Mr. Scott Wright, MISO now faces a Reliability Imperative. As part of its response with respect to Resource Adequacy, MISO is focused on addressing the following: (1) Improving outage scheduling and expectations; (2) Linking resource accreditation and requirements with initial focus on Load Modifying Resources ("LMRs"); (3) Aligning Planning Resource Auction ("PRA") commitments with energy needs all year; and (4) Ensuring flexible resource availability to address changing fleet characteristics. The proposed Tariff enhancements presented in this filing are necessary to further address the Reliability Imperative. Moreover, the urgency of implementing the proposed Tariff enhancements is evidenced by the increased incidence of capacity emergency maximum generation alerts, warnings, and events (collectively referred to as "MaxGens"),[2] particularly in the Seasons outside of Summer as demonstrated in the chart below. The reasons for and impacts of these changes are described in more detail in the Testimonies of Mr.

[1] *See* https://cdn.misoenergy.org/20180405%20RSC%20Item%2007%20RAN%20Issues%20Statement%20White%20Paper164746.pdf

[2] *See* https://cdn.misoenergy.org/SO-P-EOP-00-002%20Rev%2012%20MISO%20Market%20Capacity%20Emergency554411.pdf

Scott Wright and Mr. Jameson Smith supporting this filing.

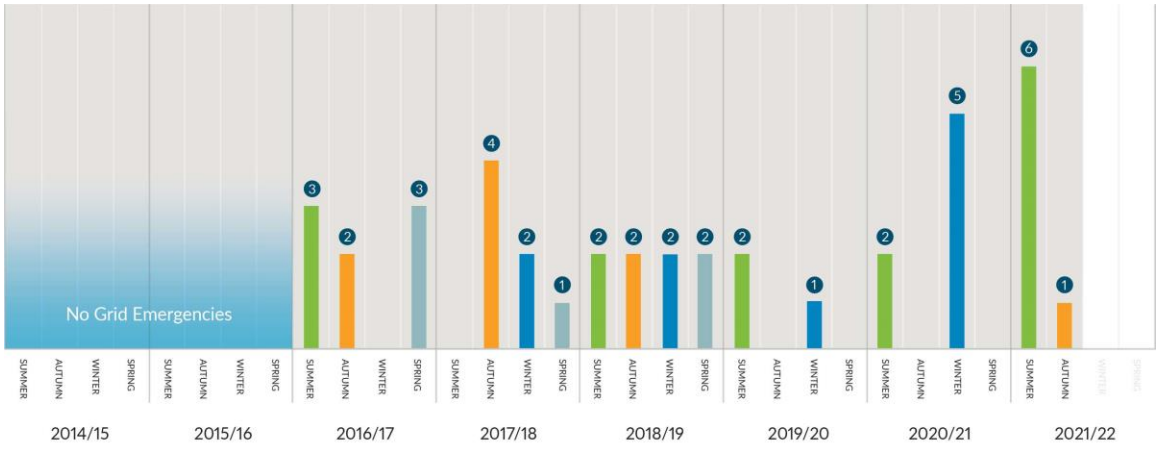


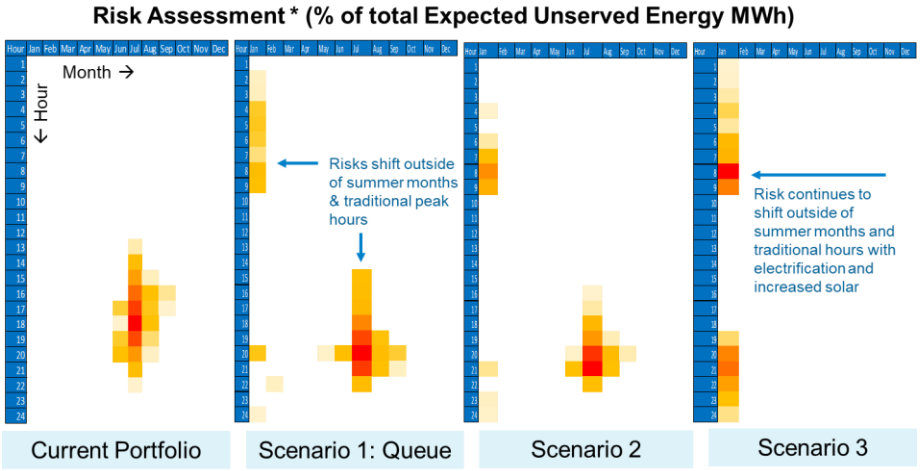
Chart indicates the number of days under a max gen alert, warning or event.

Q. How will reliability risks change as MISO's resource portfolio continues to evolve?

A. In addition to the increasing number of non-Summer MaxGens that MISO has experienced in the past several years, Loss of Load risks are projected to continue shifting outside of Summer and traditional peak hours. This is expected to be the case under a broad range of plausible future resource portfolio scenarios that MISO has developed and analyzed, as illustrated in the Figure below. Scenario 1 represents a 2025 resource mix outlook based on current MISO Generator Interconnection Queue and OMS-MISO survey projected retirements. Scenario 2 models a continuation of current trends and largely represents MISO member resource plans and provides a 2030 resource mix as defined in MISO Future 1.[3] Scenario 3 represents a 2035 resource mix outlook with accelerated existing fleet

[3] *See* https://cdn.misoenergy.org/MISO%20Futures%20Report538224.pdf

retirements and adoption of renewables and electrification as defined in MISO Future 3.[4]



Q. How will a seasonal RA construct address the concerns identified by MISO?

A. Moving to a seasonal RA construct will align seasonal resource accreditation with seasonal resource availability to meet the changing risk profile that is emerging and is expected to increase dramatically in the near future. The proposed change to a seasonal Resource Adequacy construct is expected to mitigate risks to reliability within the MISO footprint by promoting Availability, Visibility, and Flexibility, which are "Key Needs" MISO outlined in the 2019 and 2020 MISO Forward Reports.[5] For Availability, a seasonal RA construct enables a more accurate representation of resource capability at different times during the year, improves certainty of resource availability outside the Summer Season, and better incentivizes resources to be available when needed. For Visibility, a seasonal RA

[4] *Id.*

[5] https://www misoenergy.org/about/miso-strategy-and-value-proposition/MISO_Strategy/strategy-papers/#nt=%2Fstrategypapertype%3AMISO%20FORWARD&t=10&p=0&s=strategypaperpublisheddate&sd=desc

construct establishes seasonal reserve requirements, both system-wide and in LRZs, that better align with risks and deliver additional visibility into the risks throughout the year, which are not currently captured in the annual RA construct. There are also indirect improvements to the flexibility of resources that operators may not have had previously. These resources may improve their characteristics to be able to take shorter outages or need less time to respond. Additionally, consideration of unit lead time for offline units for the purposes of accreditation is a part of the proposal. At implementation, the flexibility required for accreditation purposes is a lead time that does not exceed 24 hours allowing the resource to be committed the day ahead in MISO's existing commitment processes. Finally, these reforms considered together provide the ability for resource owners to commit resources only when they are needed and expands opportunities for resources to participate in the PRA, suspend, or retire.

Q. What changes are necessary to implement the proposed RA construct?

A. Changes include developing seasonal values for a number of construct parameters: MISO's Loss of Load Expectation ("LOLE"); Planning Reserve Margin Requirements ("PRMR"); Local Reliability Requirements ("LRR"); Local Clearing Requirements ("LCR"); Capacity Import Limits ("CIL"); and Capacity Export Limits ("CEL"). In addition, the changes will require accrediting resources by Season based on their availability during times of need.

Q. How does MISO define the various Seasons for its proposed seasonal RA construct?

A. The seasonal RA construct will follow the definition of Season as defined in Module A of MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff ("Tariff"): Winter (December, January, February); Spring (March, April, May); Summer (June, July, August); and Fall (September, October, November). This definition of Season is used in various MISO processes, including Financial Transmission Rights and seasonal resource assessments.

Q. Why does MISO need to update its LOLE modeling and methodology to implement a Seasonal RA construct?

A. The modeling and methodology of the LOLE study needs to change to model seasonally sensitive variables and calculate the construct parameters outlined above more accurately. This can be achieved through: (1) improving sub-annual LOLE modeling, including the modeling of planned outages, modeling of non-firm external support, and hourly modeling of intermittent resources; and (2) seasonal LOLE risk targets and requirement calculations.

Q. What does seasonal forced and planned outage modeling entail?

A. Seasonal forced outage rates based on historic North American Electric Reliability Corporation's ("NERC") Generator Availability Data System ("GADS") data will be used in the LOLE analysis for all thermal units. Additionally, an adjustment will be applied within the model to account for increased forced outages during extreme cold weather events. When the temperature drops below a certain threshold in the model, the outage rates for

thermal resources will be increased to reflect the correlation between extreme weather and temperatures and forced outages that are observed in real-time, especially during the Winter Season. This correlation was developed based on five years of historical outage and weather data. Five-year average planned outage rates from GADS by Season, including the observed increases during extreme cold in the Winter Season, will be included in the seasonal modeling for all thermal resources. SERVM (the software used to conduct the LOLE study) will schedule planned outages using a flexible outage method. This outage modeling method requires a portion of the planned outages to be fixed and then optimally schedules the remaining outages to reflect the actual operational flexibility to do so and maintain reliability.

Q. What does the improvement of non-firm external support in the LOLE model entail?

A. Non-firm external support (*i.e.,* imports) will be modeled as a probabilistic distribution input in SERVM, an enhancement from current modeling practice that uses an annual fixed value. One of the benefits of being part of the Eastern Interconnection is the ability to import energy from neighboring regions as needed, subject to availability. Hourly historical non-firm imports during emergency pricing hours, for the period 2016 to 2019, calculated by subtracting firm import MWs from total import MWs, will be used to determine the probabilistic distribution of non-firm imports into the MISO Region as an input to the LOLE model. During the LOLE simulations, SERVM randomly draws from this distribution of non-firm imports, which is used to serve the hourly load. This

methodology is a better representation of non-firm imports when compared to the current annual approach (which assumes a static value) as it captures the variability observed in operations.

Q. Please describe the enhancements to the treatment of intermittent resources in the LOLE model.

A. Instead of modeling wind and solar resources as monthly fixed capacity values under current practice, wind and solar resources will be modeled as hourly profiles that correspond to each of the 30 load shapes within SERVM to better reflect the availability and variability of these resources across the year. Hourly wind profiles are developed for 30 historical weather years by normalizing historical hourly wind outputs for recent weather years from 2011 to 2019 and constructing synthetic hourly wind shapes for weather years from 1990 to 2010 based on temperature correlation.[6] Figures 4 to 13 in the MISO published sub-annual LOLE Modeling Methodology Document illustrate the close correlation between historical wind output and temperature/load.[7] MISO believes it is appropriate to use the correlation between wind and temperature to develop wind profiles to reasonably model the relationship of load to wind outputs and have a similar distribution of wind outputs as a function of the 1990-2010 load shapes as seen in the 2011-2019 shapes where actual historical wind outputs are available. Hourly solar profiles for 42 selected sites across the MISO Region are developed using the NREL National Solar Radiation Database Data Viewer from 1998 to

[6] *See* https://cdn.misoenergy.org/20201104 RASC Item 04a Astrape MISO Sub-annual LOLE Modelling Methodology Document489436.pdf

[7] *Id.* at 5 – 10.

2019 and processed through the System Advisor Model to generate fixed and tracking solar profiles. The hourly solar profiles for 1990 to 1997 weather years are then selected by using daily solar profiles from the day that most closely matched the peak temp out of all days (+/- 2 days) of the source day from 1998 to 2019.[8] Similar to wind profiles, using the correlation between solar outputs and temperature reasonably models the relationship between load and solar outputs and creates a similar distribution of solar output as a function of load for 1990 to 1997 as is seen in the 1998 to 2019 time frame.

Q. How will seasonal LOLE targets be determined and Resource Adequacy Requirements be calculated?

A. To determine seasonal Resource Adequacy reserve requirements, the LOLE model needs to have a defined LOLE target for each Season. MISO proposes to round LOLE targets up to a minimum of 0.01 day per year for any Season(s) with LOLE less than 0.01 day per year and maintain LOLE targets for the Seasons with LOLE greater than 0.01 day per year. MISO believes this approach is reasonable considering the practicality of solving the model to a reasonably small LOLE target to determine reserve requirements, as described further below. The following process will be utilized to determine the seasonal requirements via the LOLE analysis. First, an LOLE analysis for the Planning Year will be conducted to solve the model to an annual LOLE of 0.1day per year to determine the natural LOLE distribution, by either adding proxy combustion turbine units with typical size (160 MW) and class average Forced Outage Rate Demand

[8] *See* https://cdn.misoenergy.org/20201104 RASC Item 04a Astrape MISO Sub-annual LOLE Modelling Methodology Document489436.pdf

("EFORd") if the LOLE for the Planning Year is greater than 0.1 day per year or a perfect negative unit with zero forced outage rate if the LOLE for the Planning Year is less than 0.1 day per year, consistent with the approach under the current annual construct.[9] If the LOLE for a Season is equal or greater than 0.01 day per year, the reserve requirement for that Season will be calculated based on this LOLE analysis. If the LOLE for any Season is less than 0.01 day per year, an additional LOLE analysis will be performed to determine the reserve requirement for that Season by adding a perfect negative unit with zero forced outage rate to that Season until the LOLE in that Season reaches 0.01 day per year. In collaboration with stakeholders, the 0.01 day per year LOLE minimum target is chosen for each Season because it is a large enough target to allow the LOLE model to accurately solve to determine seasonal reserve requirements while keeping an annual LOLE largely close to 0.1 day per year. This method also ensures that requirements in Seasons where the LOLE is naturally greater than 0.01 day per year are not artificially inflated, which would result in increased cost to Market Participants.

Q. Please describe the seasonal Planning Reserve Margin and Planning Reserve Margin Requirements.

A. A Planning Reserve Margin ("PRM") (expressed as a percentage) will be determined for each of the four Seasons by performing an LOLE analysis with seasonal input assumptions. The LOLE model will be used to meet the seasonal LOLE targets by adjusting the capacity within the model up or down as needed,

[9] https://cdn misoenergy.org/PY%202021%2022%20LOLE%20Study%20Report489442.pdf

as described above. The seasonal PRM values in terms of Unforced Capacity ("UCAP") will be calculated and expressed as a percentage of seasonal coincident peak demand. The PRM for each Season is multiplied by the 50/50 forecast of coincident peak load to determine the PRMR (in MWs) for that Season.

Q. Please describe the seasonal zonal Local Reliability Requirements and Local Clearing Requirements.

A. The zonal Local Reliability Requirements ("LRR") will be determined using the same two-step process as the PRM analysis. Each Zone will be treated as an isolated system, consistent with the existing LRR analysis methodology under the current annual PRA construct.[10] The seasonal LRR values will be calculated in terms of UCAP and expressed as a percentage of seasonal zonal Coincident Peak Demand once the model has been solved to the appropriate LOLE targets. The seasonal LRR values will be used to determine the seasonal LCR values by subtracting the seasonal Capacity Import Limits ("CIL") from the seasonal LRR.

Q. Please describe seasonal Capacity Import/Export Limits.

A. Consistent with the existing transfer limit analysis methodology defined in MISO's Resource Adequacy Business Practices Manual ("BPM"), BPM-011, seasonal transfer analyses will be performed to determine seasonal CILs and Capacity Export Limits ("CELs"), capturing the seasonal variation of transfer limits for each LRZ. Planning Year seasonal peak powerflow models and input files developed from MISO Transmission Expansion Plan ("MTEP") studies built for timeframes matching the effective periods of transfer limit analysis will be

[10] *See* https://cdn misoenergy.org/PY%202021%2022%20LOLE%20Study%20Report489442.pdf

used to perform transfer analyses for each Season, including Summer Peak, Fall Peak, Winter Peak, and Spring Peak study models. Seasonal MTEP powerflow models will include both approved and planned transmission projects through the MTEP planning process with effective dates on or before the effective date of the study models. Single-element contingencies in MISO and its seams areas will be evaluated and all facilities under MISO functional control and all seams facilities of 100kV and higher will be monitored. First Contingency Incremental Transfer Capacity ("FCITC") analysis will be performed for each of the seasonal powerflow models to identify limiting constraints with a generation-to-generation transfer model. Additional Generation Limited Transfer and voltage limited transfer analyses may be performed on an as needed basis if certain scenarios occur as described in the BPM for Resource Adequacy. The resulting seasonal Zonal Import Ability ("ZIA"), in conjunction with controllable exports, will be used to subtract from the LRR to determine the seasonal LCR for each LRZ.

IV. RESOURCE ACCREDITATION OVERVIEW

Q. What is MISO's current approach to Resource Accreditation?

A. The current resource accreditation process, which for thermal resources is based on Unforced Capacity ("UCAP"), is determined using resource performance between September 1 and August 31 of the three years prior to the Planning Year. Market Participants submit GADS data to MISO on a quarterly basis. This data is utilized to determine Equivalent Forced Outage Rate Demand ("XEFORd"), excluding events outside of management control, which is then used as a component in the calculation of Unforced Capacity. The UCAP is calculated by

taking Installed Capacity ("ICAP"), which is the lesser of Generator Verification Test Capacity ("GVTC") and Total Interconnection Service, multiplied by one minus the XEFORd. UCAP values are communicated to Market Participants on December 15 prior to the Planning Resource Auction. The proposed rules will continue to utilize the same period to evaluate availability for determining Seasonal Accredited Capacity ("SAC").

Q. How does MISO propose to calculate Resource Accreditation going forward?

A. Resource accreditation should primarily reflect the anticipated capability and availability of Planning Resources during times when they are most needed. Utilizing offered availability and actual performance provides an improved measure of expected availability for each Season.

Q. Which resources will the Resource accreditation proposal affect?

A. All resource types will be generally affected by moving to a seasonal Resource Adequacy construct. However, accreditation for certain resources will be determined based on their availability during times of need, as described in detail below. Specifically, Demand Response Resources and Capacity Resources that are Generation Resources (collectively "Schedule 53 Resources"), but not Dispatchable Intermittent Resources, Intermittent Generation, Electric Storage Resources, External Resources or Use Limited Resources, will be subject to these new availability-based accreditation requirements. The resources designated as Schedule 53 Resources will be subject to the proposed availability-based accreditation methodology established in new Schedule 53 of the Tariff. Resources that are not subject to Schedule 53 will continue to have their

accreditation determined generally as it is done today, with appropriate adjustments made to convert their accreditation to a seasonal basis. I note that MISO plans to further evaluate the accreditation methodologies of non-Schedule 53 Resources commencing with stakeholder discussions in 2022.

Q. What changes does MISO propose with respect to Resource Accreditation for Schedule 53 Resources?

A. The proposed changes align Resource accreditation for Schedule 53 Resources with historic availability and performance during the highest risk periods while also accounting for general availability of resources across the year. More specifically, MISO proposes a two-tiered calculation to determine individual resource accreditation by Season. The first tier will determine each resource's real time offered availability during non-tight operating condition hours, and the second tier will determine each resource's real-time offered availability during hours with the tightest operating conditions, including declared MaxGens. The second tier will be more heavily weighted so that the majority of a resource's accreditation will be based on its availability during times of need. Additional details about the weighting and the proposed transition period to phase in the full 80% weighting for Tier 2, are described in detail below.

MISO supported its Independent Market Monitor's ("IMM") recommendation to base 100% of accreditation on availability during times of need but introduced a revised two-tier proposal in May 2021 with 20% weighting based on availability during hours that aren't tight to accommodate stakeholder requests that these hours should still be relevant to resource accreditation. The proposal was

modified to recognize that general resource availability supports reliability by allowing resources to take needed maintenance outages. Moreover, general resource availability reduces the time the system is operating within the margin of error for capacity sufficiency.

Each tier calculation also will account for exemptions obtained by sufficiently coordinating planned outages when determining availability, as described in detail below.

Q. Why are MISO's proposed changes necessary?

A. Historically, most if not all LOLE occurred at or near the annual Coincident Peak Demand for the system, which occurred in the Summer. However, MISO has experienced an increasing number of days with tight operating margins in all four Seasons of the year despite clearing the targeted level of reserves in the PRA each year. This is attributable, in part, to a wave of retirements that began before the start of the 2016/17 Planning Year. Given this and recent operational experiences, including involuntary load shed outside of Summer, MISO has worked with stakeholders to provide tools and incentives to improve the availability, flexibility, and visibility of our resource fleet to mitigate the risks of capacity insufficiency.

Resource accreditation should reflect the anticipated capability and availability of Planning Resources during times when they are most needed. Historically, accreditation for conventional generation has been based only on forced outage rates defined in GADS. Recent experience shows this approach does not effectively reflect the actual availability and capability of resources during times

when capacity needs are highest – during periods of peak demand, high generation outages, low levels of renewable generation output, or a combination of these which can occur in any Season. Additionally, the current approach to accreditation for conventional thermal resources does not provide the proper incentives to improve availability, especially during critical periods, as described more fully in the Testimony of Mr. Smith.

Q. What benefits does MISO expect to receive from these proposed changes to Resource Accreditation?

A. MISO expects the proposed Tariff changes to achieve several important and necessary benefits, including: (1) increased confidence in the accredited capacity MISO can count upon during times of need; (2) improved signals for resource availability during times of need; (3) improved outage coordination processes; and (4) lower non-Summer Season requirements, which will enable seasonal operation of resources, as requested by many resource owners.

Q. How does the proposal mitigate reliability risks during extreme weather events?

A. The proposal incentivizes resource availability during times of need and does so specific to each Season. For example, Winter RA Hours have been observed to occur during extreme cold events and decisions and investments which impact resource availability in such conditions (*e.g.*, winterization and firming up of fuel procurement) are expected to have a significant impact on resource availability.

Q. How will MISO's Resource accreditation proposal apply to Schedule 53 Resources?

A. Resource accreditation for Schedule 53 Resources will no longer be based on forced outage rates from GADS as MISO intends on using energy market offers and related parameters to determine these resources' accreditation. Specifically, their accreditation will be based on Real Time Hourly Emergency Maximum Limits (or Targeted Demand Reduction Level ("TDRL") for Demand Response Resources) information in MISO's Day-Ahead and Real-Time system. If a unit is offline, then its lead time and outage status are also relevant to determine if it could be reasonably committed today to be used tomorrow during a time of need. Other factors such as the type and volume of interconnection service and seasonally corrected GVTC values will be utilized as well to account for changes to deliverability or unit capability not reflected in past offers. The proposed construct will continue to base accreditation on the three prior years starting September 1 through August 31 of the year prior to the Planning Year, which reflects the cumulative availability of a Resource. As noted above, MISO proposes a tiered weighting structure with more emphasis on low operating margin RA Hours to determine individual resource accreditation by Season. Accreditation will be based on each resource's real-time offered availability during all hours with heavier weighting for hours with the tightest operating conditions (*i.e.*, RA Hours) while incentivizing the coordination of planned outages by offering exemptions that remove hours when offers were zero when certain conditions are met.

Q. What are Resource Adequacy hours?

A. Resource Adequacy Hours ("RA Hours") represent the periods of highest risk and greatest need both during a Season and throughout the Planning Year. They include declared MaxGens and the hours when the operating margin, a measure of available economic supply capacity above demand and reserve requirements, is at its lowest. RA Hours will be determined seasonally, based on declared MaxGens and the tightest operating margin hours subject to a maximum operating margin threshold established at 25 percent. Each Season will have a target of 65 RA Hours (which represents approximately three (3) percent of the hours in a Season). The number of RA Hours in a Season can exceed the target when declared MaxGens during that Season have a duration greater than 65 hours. The number of RA Hours in a Season can be less than the target because of the 25 percent maximum operating margin threshold. In this latter case, these Seasons will have an RA Hour deficiency equal to the difference between the target of 65 RA Hours and the actual number of RA Hours.

Q. How does MISO ensure resources have a minimum target number of Resource Adequacy Hours?

A. MISO proposes to ensure resources have a minimum of 65 RA Hours for any Season for which they were designated for RAR by multiplying the number of deficient hours for a Season with the Annual Average Offered Capacity ("AAOC") over all RA hours for that resource during the same annual period (*i.e.*, September to August). It is necessary to have a minimum number of RA Hours to support stability of accreditation values and avoid situations where a Resource loses most of its capacity value for the Season because it happened not to be

available on the one or two days when operating margins were at their lowest for the Season. The RA Hours used for determining the AAOC for a resource are the tightest 3 percent of operating margin hours and declared MaxGen hours whenever they occur over the same annual period provided a resource was designated for RAR and had not secured an exemption. The target number of hours for AAOC is 260 for the annual period (*i.e.*, 65 hours per Season multiplied by four Seasons) with the distribution based on tightness and MaxGens rather than a specified target in any Season. Historical analysis shows many of these hours have occurred in the Summer during recent Planning Years. MISO believes it is prudent to supplement deficient seasonal RA Hours with a proxy-based on AAOC as it reflects the next best available information about a resource's availability during times of need, which is a core focus of MISO's proposed enhancements to resource accreditation.

It is important to note that, despite the general discussion above about how RA Hours are identified for a Season, ultimately the set of RA Hours are specific to each resource being accredited because of outage exemptions, capacity replacement requirements (each as described later in my testimony), and differences in resource commitment over the three-year look back period. No resource can have more RA Hours than the amount that has been identified for a Season or year, but many resources will have fewer RA Hours requiring more of a resource's accreditation to be based on availability during times of need during the annual period and not just the specific Season to ensure sufficient sample sizes for RA Hours to support stability of resource accreditation.

Q. How will the location of a resource impact its RA Hours?

A. To reflect the varying risk of capacity insufficiency across the MISO Region, Resource Adequacy hours are defined within the First Planning Area (*i.e.*, MISO North/Central) and the Second Planning Area (*i.e.*, MISO South) separately. RA Hours will be determined on this sub-regional basis to reflect the growing frequency of MaxGens that occur on either side of the Sub-Regional Power Balance Constraint, as demonstrated in the below chart:

Region of highest severity	# of MaxGens
Central	3
North/Central	9
South	21
Footprint	7
Total	40

MaxGen Events are often the result of issues that disproportionately impact one Planning Area or the other but are usually not felt uniformly across the entire MISO region. Typically, these issues include: trapped capacity in one sub-region due to the contractual transfer limits; increasing sub-regional challenges driven by portfolio differences; and, the varying locational impacts of extreme weather, including hurricanes, cold weather events, and renewable penetration.

Q. How is the hourly Operating Margin percentage calculated?

A. As described in Schedule 53, the Operating Margin is determined using historical information to identify Seasonal RA Hours and Annual RA Hours within the three

(3) most recent periods beginning September 1st and ending August 31st. The Operating Margin Equation is as follows:

$$Operating\ Margin\ (\%)_j = \frac{Online\ margin\ (MW)_j + \ offline\ margin\ (12 - hour\ lead\ time)(MW)_j}{Real\ Time\ (RT)\ Load\ (MW)_j}$$

Where:

$Online\ margin\ (MW)_j = \sum_{unit\ i\ in\ region\ j}(EmergencyMax_i - Energy\ MW_i - cleared\ operating\ reserve_i)$ For all Resources online and under normal dispatch control.

$Offline\ margin\ (MW)_j = \sum_{unit\ i\ in\ region\ j} Emergency\ Max_i - cleared\ offline\ supplemental\ reserve(MW)_j$ For Resources where all of the following is true: (i) Resource is Offline; (ii) it's cold-start lead-time is less than or equal to 12 hours; and (iii) it's not on outage.

Q. Why does MISO propose to use a 12-hour lead time for offline resources in the Operating Margin calculations?

A. Previously MISO proposed a 24-hour lead time but the IMM suggested that use of a shorter lead time would better reflect the actual operating margins MISO is seeing in real-time operations, which may be impacted by uncertainty that occurs after the deadline to commit longer lead resources has passed. MISO agrees that the use of a shorter threshold better reflects historical margins in the recent past, as evidenced by the chart below. It also leads to the identification of more RA Hours below the 25% operating margin threshold used to identify RA Hours. Moreover, twelve hours leads to more RA Hours being identified in each Season,

allowing resource accreditation to be based on availability during a specific Season with less need to fill in deficient hours through the use of the AAOC, as explained above.

Seasonal Tier 2 tight condition hours are defined across the year based on retrospective tight supply time periods and MaxGen event hours

RA hours are defined as tight margin hours and emergency hours over four historical planning years

- Margin (%) = online margin + offline margin (24-hour lead time) / Real-Time (RT) load
- Tight margin hours (RA hours) are selected through the following process for Central+North and South separately:

(1) MaxGen hours automatically become RA hours

(2) For each season in each Planning Year, supplement number of RA hours to 3% of hours in each season (65 hours)

(3) Exclude **hours if margin is greater than 25%**. Therefore, some seasons will have less than 65 hours [cells highlighted below]

Sample Calculation

	Central + North						South				
Planning Year	Summer	Fall	Winter	Spring	Total		Summer	Fall	Winter	Spring	Total
2018-2019	65	65	54	4	188		65	65	15	65	200
2019-2020	65	49	0	0	114		65	65	7	2	139
2020-2021	65	19	65	37	186		65	65	100	28	258
Total	195	133	119	41			195	195	112	95	

Q. Why is MISO using a 12-hour lead time to identify RA Hours but a 24-hour lead time for accreditation in Schedule 53?

A. As described above, due to the operational uncertainties that MISO faces, tight conditions are more likely to be identified 12 hours before a projected capacity shortfall than 24 hours. Use of a 12-hour threshold better identifies RA Hours that represent "times of need." On the other hand, the use of a 24-hour threshold for accreditation with respect to offline resources better reflects whether MISO could have reasonably committed a resource in its Day-Ahead Market or Forward Reliability Assessment Commitment processes. This is consistent with the goal of MISO's RAN initiative to close the gap between planning and operational outcomes. MISO's proposal bases most of a resource's accreditation on its offers during times of need but the process of identifying RA Hours that reflect times of

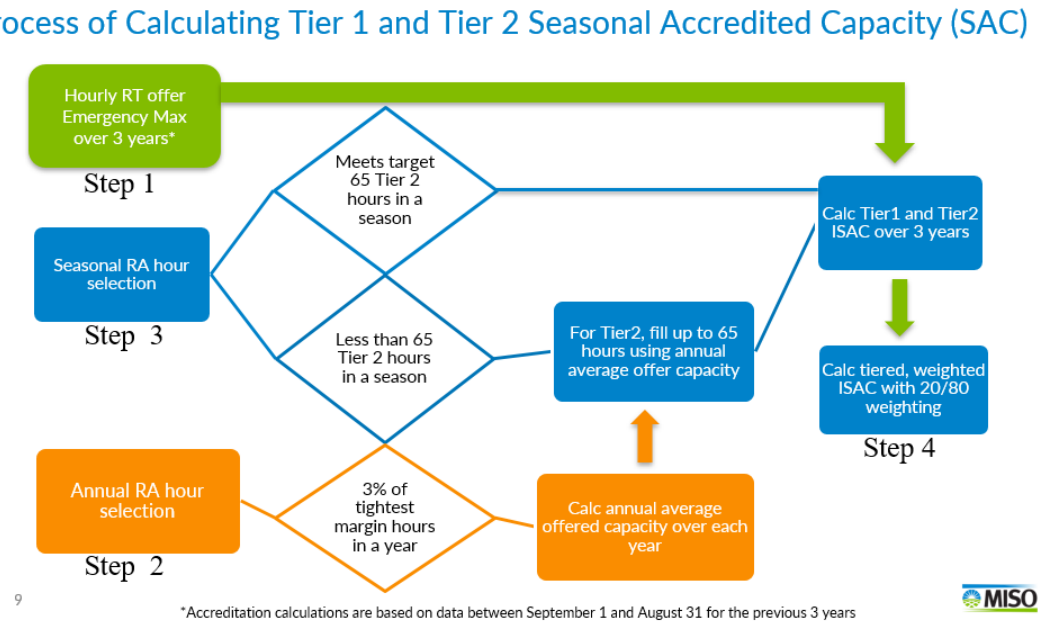
need must also account for resources that could not be accessed due to long start-up and notification times.

Q. Why is a 25% margin threshold applied in identifying Resource Adequacy hours?

A. MISO has examined the distribution of Operating Margin and Operating Margin levels for historical MaxGen events. The evaluation indicates that a 25% margin threshold captures the vast majority of declared MaxGens events. Also, by examining the cumulative count of hours at different levels of Operating Margin in each Season, MISO found that the 25% threshold provides a reasonable balance between having an adequate number of RA Hours for each Season and selecting the set of RA Hours that are truly tight.

Q. Please provide a step-by-step description of the Intermediate SAC calculations in Schedule 53.

A. First, a Resource will have its Intermediate Seasonal Accredited Capacity ("ISAC") determined based on offers of its Real-Time Hourly Emergency Maximum Limit, or TDRL for Demand Response Resources, during both seasonal RA Hours (Tier 2) and Non-RA Hours (Tier 1), as set forth in Schedule 53. References to "RT offers" in the steps below refer to Hourly Emergency Maximum Limit or TDRL as applicable. The following graphic illustrates the process of calculating Tier 1 and Tier 2 ISAC for a Resource.



Step 1: Cap Real-Time offers for the three-year look back period by the relevant seasonally corrected GVTC value to account for a resource's most recently demonstrated capability. For resource's that have increased their capacity, MISO will increase the RT offers based on a class average SAC percentage for hours prior to such increased capacity to reflect the additional capacity. Ensure RT offers equal zero when a Resource is on outage or is offline and has a combined Start-Up Time and Start-Up Notification Time greater than 24 hours to reflect that the resource was not available in the Day-Ahead commitment processes.

Step 2: For each year in the three-year look back period (September 1 – August 31) identify declared MaxGen hours and then the tightest non-MaxGen hours needed to reach 260 hours (3%) for the relevant Planning Area in which the resource is located and then remove any hours during which the Resource had a Tier 2 Planned Outage Exemption. The remaining hours are the Annual RA Hours for the resource. Sum the RT offers and divide by the number of Annual

RA Hours for the Resource to calculate its Average Annual Offer Capacity ("AAOC") for each year in the three-year look back period.

Step 3: For each Season, identify declared MaxGen hours and then the tightest non-MaxGen hours with operating margin less than 25% for the Planning Area that needed to reach the target of 65 hours (3%). Then remove any hours during which the Resource had a Tier 2 Planned Outage Exemption. If the Resource has less than 65 hours in any Season MISO will add hours with RT offers equal to the relevant AAOC for any deficient hours. MISO will sum up the RT offers during RA Hours for the Season over the 3-year look back period and divide by the total number of hours (195 or greater) to determine the Tier 2 ISAC value for each Season. Calculate the Resource's Tier 1 ISAC value for each Season by summing the RT offers for any non-RA hours over the 3-year look back period (after first removing any hours for which the Resource had a Tier 1 Planned Outage Exemption) and then dividing by the total number of hours.

Step 4: Multiply the Resource's Tier 1 and Tier 2 ISAC values for each Season by their weightings (20% for Tier 1 and 80% for Tier 2 after the proposed transition) to calculate its final ISAC value.

Q. What does "Intermediate SAC (ISAC)" mean in Schedule 53?

A. Schedule 53 describes various steps in the calculation of SAC and until the very end the "in process" value is referred to as "intermediate" SAC or "ISAC." Each Resource will have four ISAC values (one for each Season of the upcoming Planning Year) while the SAC calculation is in process.

Q. How does the ISAC value become SAC?

A. Once the final ISAC for each Resource has been determined for each Season of the upcoming Planning Year, then a system-wide conversion ratio is determined for each Season and applied to each Resource's ISAC to determine a Resource's final SAC value for each Season.

$$RATIO\frac{UCAP}{ISAC} = \frac{Sum(UCAP_{Schedule\ 53\ Resources})}{Sum(ISAC_{Schedule\ 53\ Resources})}$$

Q. Why is a conversion ratio necessary and why is it applied as the final step to calculate SAC in Schedule 53?

A. MISO's IMM originally suggested, and MISO adopted, a proposal that would scale seasonal requirements by the change in accreditation under Schedule 53 to ensure alignment with how requirements were determined during the LOLE study conducted under a UCAP approach. However, this approach required changes to how PRMR and LCRs are determined and appeared likely to have several unintended consequences, including the relative share of accreditation between Schedule 53 (generally thermal resources) and non-Schedule 53 Resources. Subsequently, the IMM proposed a simpler methodology that avoided the issues noted by having the required scaling occur at the end of the calculations proposed in Schedule 53, thereby removing the unneeded and unintended impacts to auction requirements and non-Schedule 53 resources. Additionally, the revised proposal addressed stakeholder concerns on deliverability and revenue reduction. The IMM presented its new recommendation at the October 6, 2021 meeting of the RASC, and formal feedback was solicited. Feedback received from

stakeholders was generally in support of the revised conversion method and MISO adopted the revised method and shared related Tariff redlines at the November 11, 2021, meeting of the RASC.

Q. How will the tiers be weighted?

A. The ISAC value is the weighted average over its values from the two tiers as calculated in the steps above. Ultimately assigning heavier weighting for Tier 2 tight condition hours ensures the alignment between a resource's Seasonal Accredited Capacity value and its availability and performance during times of highest risk and greatest need in MISO's Planning Areas. The corresponding tier weightings, which will be effective following a two Planning Year transition (described below), are:

$$ISAC_{Tier1_weighting} = 20\%$$

$$ISAC_{Tier2_weighting} = 80\%$$

$$ISAC = ISAC_{Tier1_value} \times ISAC_{Tier1_weighting} + ISAC_{Tier2_value} \times ISAC_{Tier2_weighting}$$

Q. Is there a transition to the 80% weighting for Tier 2?

A. Yes. Stakeholders requested a transition and MISO felt it would be appropriate to phase in the full 80% weighting until the third Planning Year ("PY") following initial implementation (*i.e.*, the 2025/2026 Planning Year). Doing so will account for the fact that the historical RT offers, outages, and notification times used in the Schedule 53 calculations were submitted for resources without knowledge of the final accreditation methodology proposed in the instant filing. Under the proposal, Tier 2 would start at 60% in PY 2023/24, rise to 70% in PY 2024/25 and then reach the full 80% in PY 2025/26.

Q. What is the ultimate product of this process?

A. The ultimate product of Schedule 53 is four SAC values for each Resource, one to be used for each Season commencing with the upcoming Planning Year 2023/24.

Q. How will MISO account for resources with insufficient performance data, such as new resources?

A. Units with insufficient performance data will utilize a class average proxy for accreditation as done today, but this class average will be based on SAC rather than UCAP. Class averages will be determined for each resource type as they are today. However, the class average will be a ratio of SAC to ICAP for a particular class. A new resource will apply this ratio to its ICAP to determine its SAC. A resource will only use a class average for a Season when there is less than 60 days of real-time offered availability for that Season during a time when the resource was designated for RAR. However, for Planning Year 2023/24 MISO accommodated a stakeholder request by adding Tariff language giving a resource that hadn't been designated for RAR in a recent annual PRA the option to have its accreditation based on its real-time offers rather than a class average.

Q. Does MISO's proposal account for seasonal resource deliverability?

A. Yes, it does. For seasonal deliverability, similar to the current process, if a Resource does not have full Network Resource Interconnection Service ("NRIS") granted for its seasonal GVTC, to the extent the output is within the total granted Energy Resource Interconnection Service ("ERIS") and does not violate the generator's Generator Interconnection Agreement ("GIA"), it can: (1) request

additional NRIS through the established process in Attachment X; or (2) procure firm Transmission Service Requests to align with seasonal deliverability needs.

Q. How will MISO's proposal address deliverability requirements?

A. The recently accepted ICAP deliverability Tariff changes remain in effect without modification as these requirements are appropriately applied to each Season under the proposal. However, based on stakeholder feedback, MISO will continue to evaluate whether additional modifications to these requirements are needed in the future.

Q. How will MISO's accreditation proposal apply to wind resources?

A. Wind resources are currently accredited through an annual Effective Load Carrying Capability ("ELCC") methodology with capacity credits allocated based on each individual wind resource's performance over eight peak demand hours for the year, historically occurring in the Summer. Similarly, under a seasonal construct, accreditation for each Season will be based on seasonal ELCC studies with capacity credit allocated based on eight peak hours for each Season.

Q. How will MISO's accreditation proposal apply to non-wind intermittent and Energy Efficiency Resources?

A. Seasonal accreditation for non-wind intermittent resources (such as run-of-river hydro, solar, and biomass) and for Energy Efficiency Resources will be based on historic output during hours ending 15, 16 and 17 EST for the relevant Spring, Summer, and Fall months. Winter accreditation will be based on hours 8, 9, 19 and 20 EST for the Winter months. The selected hours represent the typical seasonal peak demand hours for the specified Seasons.

Q. How will MISO's accreditation proposal apply to Demand Resources?

A. MISO's May 2020 Tariff filing that was accepted by FERC will also be implemented with the 2022-2023 Planning Year. That filing accredits Demand Resources registering as Load Modifying Resources ("LMRs") based on lead time and number of calls per year.[11] The lead time requirements will remain unchanged, but the number of calls will be modified to transition to a seasonal construct. LMRs must be available for a minimum number of calls for each Season as follows: five for Summer, five for Winter, three for Spring, and three for Fall to be eligible to offer into the PRA for each respective Season. Establishing a minimum number of calls per Season rather than per Planning Year is consistent with procuring seasonal capability to meet seasonal needs and incurs a minimum obligation to inform offers into each Season. Demand Response Resources that are not registering as LMRs will be accredited pursuant to Schedule 53 since they submit offers in the day-ahead markets and can be appropriately accredited based on their availability during times of need.

Q. How will MISO's accreditation proposal apply to behind-the-meter generation?

A. Intermittent Behind the Meter Generation ("BTMG") will be accredited like all other non-wind intermittent resources (such as run-of-river hydro and solar), under a seasonal construct. As described above, accreditation will be based on historic output during hours ending 15, 16 and 17 EST for the relevant Spring, Summer, and Fall months. Winter accreditation will be based on hours 8, 9, 19

[11] *See Midcontinent Independent System Operator, Inc.*, 127 FERC ¶ 61,138 (August 14, 2020).

and 20 EST for the Winter months. Thermal BTMG with historic GADS data (*i.e.,* with capacity greater than or equal to 10 MW) will be accredited based on their seasonal forced outage rates as it is today. Thermal BTMG with no GADS history will be accredited based on the class average seasonal forced outage rates. FERC approved notification times for LMRs and call limits for DR in MISO's May 2020 filing described in the answer to the prior question. In transitioning to the proposed seasonal capacity construct, all LMRs, including, BTMG, will be subject to those same call limits on a seasonal basis: five for Summer, five for Winter, three for Spring, and three for Fall.

Q. How Will Generation Verification Test Capacity ("GVTC") requirements change under MISO's proposal?

A. The current GVTC process has three steps: (1) Generator Operators ("GO") conduct a real power test or base GVTC on operational data between September 1 and August 31 prior to the Planning Year; or (2) Correct to historical MISO Summer coincident peak conditions, and (3) Submit in PowerGADS through the MISO Market Portal by October 31 prior to the Planning Year. A GADS integration is run to bring the GVTC from PowerGADS to the Module E Capacity Tracking ("MECT") tool. Under a seasonal construct, the GO would still conduct a real power test or base GVTC on operational data between September 1 and August 31. MISO would publish four historical MISO coincident seasonal peak dates and times for the last five years. The GO will correct the single test to each of the seasonal peak conditions for temperature and submit four seasonally corrected GVTC values by October 31.

Q. Will MISO still permit Installed Capacity deferral?

A. Installed Capacity ("ICAP") deferral, formerly known as GVTC Deferral, requires a Market Participant to submit notice by February 15, post credit no later than March 1, and test and submit test results before the last business day of May prior to the start of the Planning Year. The February 15 notice and March 1 credit posting timeline still apply, and the credit requirement will continue to be calculated as the deferred ICAP megawatts multiplied by 90 days of the annual Cost of New Entry ("CONE"). However, the deferral notice will be modified to indicate to which Season the deferral applied and the credit would be held until the resource tested. The testing would need to be performed and submitted prior to the last business day prior to the start of the applicable Season, otherwise the existing ICAP Deferral Non-Compliance Charges would apply. No changes are proposed to the ICAP Deferral Non-Compliance Charges.

V. PLANNING RESOURCE AUCTION

Q. What changes to the PRA will be needed to implement the Seasonal construct?

A. The seasonal construct will require a number of important changes relative to the annual construct, including: how MISO conducts the Simultaneous Feasibility Test ("SFT"); time needed to run the PRA; need for non-Summer seasonal forecasts; calculation of non-Summer transmission losses; seasonal must offer requirements, capacity replacement requirements, and non-compliance charges; calculation of the Auction Clearing Price ("ACP") during shortage or near-

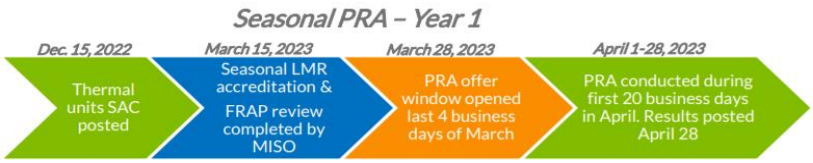
shortage conditions; calculation of offer cap impacts; and, establishing a new make whole payment mechanism. Each of these changes is discussed below.

Q. How will MISO conduct the SFT as part of the seasonal PRA?

A. Participants in the PRA may offer resources for each Season in the upcoming Planning Year during the PRA offer window period, which occurs over the last four business days in March. During the first 20 business days in April, MISO will build four SFT models to meet seasonal requirements. Results for each upcoming Season of the Planning Year that pass the SFT auction run will be posted and valid by the 20th business day in April. Results for Seasons where unacceptable constraints are found will have their SFT model rebuilt and re-run for one additional iteration. MISO will accept the result with fewest MWs of network violations of the two iterations for that Season and post the result by the 20th business day of April.

Q. How will the proposed seasonal construct affect auction timing?

A. Under a seasonal construct, all four seasonal auctions will occur at approximately the same time as the current annual PRA. The PRA offer window will remain as the last four business days of March. The auction period will be expanded from 10 business days to occur within the first 20 business days of April, allowing a maximum of two SFT auction run iterations per Season. PRA Results for each Season will be posted on the 20th business day in April. The following graphic summarizes the timeline leading up to the start of the 2023/2024 Planning Year on June 1:



Q. Will LSEs be required to submit seasonal load forecasts?

A. Yes, the current annual load forecast submittal process will be repeated for each Season. LSEs will supply Coincident Peak Demand and LRZ Peak Demand forecasts for each Season including the estimated demand from forecasted demand resources, whether registered as LMRs or not registered with MISO. The forecasts will also include demand that would have occurred but for the existence of energy efficiency resources that have been in operation less than 4 years. All submissions for such forecast values will include distribution losses but not transmission losses. All demand forecasts will reflect a 50 percent probability that the demand will not exceed the forecasted demand for the relevant time period.

Q. How will the proposal impact the treatment of transmission losses?

A. Under the current annual PRA construct, MISO calculates annual transmission losses for each Local Balancing Authority Area and LRZ based on the MISO coincident peak hour. Under the seasonal PRA construct, transmission losses will be calculated at each of the four published MISO seasonal peak hours and will be made available on both the market portal and its public website.

Q. How will must offer obligations for cleared Capacity Resources be impacted by MISO's seasonal proposal?

A. Currently resources are committed for an entire Planning Year and their must-offer obligation is the same throughout the year despite lower load expectations

outside of Summer. Under a seasonal approach, resource capabilities and capacity requirements will be tailored to each Season and resources may be committed for one Season but not committed in other Seasons. The must-offer obligation only applies for those Seasons when a Resource is committed. The must offer obligation will be ICAP multiplied by the percentage of total ZRCs a resource clears (*e.g.*, a unit eligible for 10 ZRCs that clears 5 will have a must offer of 50% of its ICAP).

Q. Will MISO require replacement of ZRCs if a resource has a planned outage or derate?

A. Yes, but only if the Generator Planned Outage or derate exceeds 31 days during a Season when the resource is committed. The proposal establishes a maximum threshold number of 31 days of full or partial Generator Planned Outages per Season that will require replacement when exceeded. A threshold of 31 days is reasonable as it retains much of the latitude resources need to schedule Generator Planned Outages while putting an upper limit on the amount of a Season that a committed resource can choose to miss without consequence under MISO's Resource Adequacy construct. Additionally, resources with unplanned outages that were known or could have been reasonably anticipated at the time of the PRA will also have a capacity replacement requirement where the full or partial outages exceeds 31 days since the outage was expected despite not being a Planned Generation Outage. An after-the-fact determination will be made following each Season to determine if resources were on planned outages or planned derates that exceeded the threshold and if such resources met the

replacement requirements. Future non-Summer seasonal PRMRs are expected to be lower than today's annual Summer-peak target, representing an efficiency in the amount of required capacity for the MISO Region. Currently, capacity replacement requirements are only in place for capacity suspensions and retirements. Under a seasonal construct with lower PRMRs, the performance and availability of committed capacity to meet seasonal requirements will be critical. Relying on resources that have submitted planned outages for a large portion of a Season is not consistent with availability-based accreditation and seasonal requirements.

A non-compliance charge will be assessed for days exceeding the threshold (as described further below) since some resource owners may not be willing or able to replace their capacity with uncleared ZRCs deliverable to the needed LRZ in the relevant Season. It should be noted that exemptions granted through the outage coordination process are not relevant to capacity replacement and will not relieve a resource owner of the ZRC replacement obligation. MISO systems and processes will continue to accommodate ZRC replacement transactions. Current replacement rules regarding deliverability and zonal transfer limits will still apply.

Q. Why is MISO imposing a charge for failure to replace ZRCs associated with a retired or suspended resource or a resource that exceeds its maximum outage or derate threshold in a season?

A. Currently, resources that convert UCAP to ZRCs and retire or suspend prior to the end of the Planning Year and fail to replace do not face any explicit non-compliance charges under the Tariff. This creates uncertainty and fails to

quantify the consequences of failure to replace. In the past, this has led Market Participants to seek waivers from FERC as opposed to complying with the Tariff requirements. The proposal is to implement a financial charge that incentivizes replacement of ZRCs that are retired, suspended, or have outages that exceed 31 days in a Season. This non-compliance charge is reasonable because, despite the owner of the resource benefitting from its committed ZRCs each day of the Season, the resource owner has decided to make itself unavailable for more than one month of the three-month Season, thus possibly failing to be available when needed to support reliability in line with our one day in ten-year standard. The proposed Capacity Replacement Non-Compliance Charge will be based on the number of days where a Market Participant had a replacement requirement but failed to do so multiplied by the amount of ZRCs that failed to be replaced multiplied by the sum of the Auction Clearing Price and the daily CONE value. Effectively the resource will stop receiving the Auction Clearing Price for clearing and start paying a daily CONE payment that reflects the missing capacity in the applicable LRZ. Distribution of Capacity Replacement Non-Compliance Charges will be distributed to Market Participants representing LSEs that have met their PRMR during the Planning Year on a pro rata basis, based upon the Market Participant's share of total PRMR for the MISO Region. Billing, invoicing, default, and uplift provisions will be similar to the ICAP Deferral Non-Compliance Charge.

Q. What are the eligibility criteria for ZRCs to be used for capacity replacement?

A. As is the case today, only uncleared ZRCs can be used for capacity replacement. ZRCs must be registered and converted in advance as part of the PRA process.

Q. With the proposed move to seasonal auctions how is MISO mitigating the risk of capacity revenue insufficiency for resources or payment above annual CONE for LSEs?

A. The move to seasonal auctions could lead to concerns about over or underpayment in certain circumstances. Based on historical PRA results, MISO does not expect such circumstances to occur frequently but considers it prudent to ensure reasonable mitigation in the unlikely event of such outcomes. MISO's proposal incorporates enhancements to offer caps and make whole provisions that ensure appropriate resources recover their costs when committed for the PRA while also ensuring that LSEs are not exposed to ACPs that result in charges that amount to multiples of annual CONE value as result of auction participation. Additional details about these enhancements are provided below.

Q. Will the PRA continue to include offer caps?

A. Yes. An LRZ may fail to clear its target PRMR in fewer than all four Seasons. Seasonal offer caps and facility-specific reference levels need to take this into account to enable some resources to economically participate in the seasonal auctions. Offers higher than the daily allocation of the annual CONE value (*i.e.*, "daily CONE" or CONE/365) could be cleared and/or set prices when needed to enable resources to cover their avoidable costs. Therefore, ZRC Offers will be enabled to recover a resource's costs if they only clear in one Season by enabling the Auction Clearing Price to be set at a level up to annual CONE divided by the

number of days in each Season, (*e.g.*, CONE/91 days, up to approximately $1,000 per megawatt day). As a result, the Auction Clearing Prices for individual LRZs and Seasons may clear above the current daily value of Annual CONE (CONE/365 or ~$250/MW-day), which is the highest price at which the current annual Planning Resource Auction can clear when there are insufficient ZRC Offers to meet auction requirements. Consequently, if no further action is taken, the auction could provide revenues up to four (4) times Annual CONE if all Seasons cleared in shortage conditions.

Q. Will the proposal mitigate the potential for recovering above the annual CONE?

A. Yes. The proposal includes provisions to mitigate, but not completely eliminate, the potential for annual auction revenue charges to exceed CONE on a per Megawatt-Year basis. An ex-post adjustment will set reduced Auction Clearing Prices when more than one Season clears in ZRC Shortage Conditions or ZRC Near-Shortage Conditions. The final Auction Clearing Price will be set based on annual CONE and the number days in all applicable Seasons when an LRZ, group of LRZs, or the MISO footprint clear with less than the required number of ZRCs or the Season's initial Auction Clearing Price clears above daily CONE in a Planning Resource Auction.

Q. Given the mitigation described above, could annual auction revenue charges exceed CONE on a per Megawatt-Year basis?

A. Yes, whenever the Planning Resource Auction clears at least one Season, but fewer than all Seasons with Auction Clearing Prices above the daily value of

CONE, it is possible that the Planning Resource Auction charges for all four Seasons could exceed annual CONE on a per Megawatt-Year basis. For example, when one Season clears at CONE due to shortage and the other three Seasons clear less than the daily CONE value. In this situation, MISO will not adjust any of the Auction Clearing Prices and any revenues collected in the non-shortage Seasons would increase the annual auction charge amounts beyond annual CONE which is being fully collected in the one Season which has a shortage. For example, if Summer clears in shortage conditions at CONE divided by 92 days ($1,001 MW-day) and then Fall at $20/MW-day, Winter at $25/MW-day, and Spring at $15/MW-day the total annual auction revenue charges would equal $97,575 per MW for the Planning Year, 6% above the CONE value for the Local Resource Zone of $92,100/MW-year.

Q. Are the mitigation provisions sufficient to minimize annual charges above CONE?

A. Yes. While the proposed offer caps and Auction Clearing Price adjustments could result in annual charges exceeding CONE, the likelihood should be infrequent and minimized. Historically, the Planning Resource Auction, has only cleared above the default economic withholding threshold two times: the first was during the 2016-2017 PRA where Zones 2-7 cleared at $72/MW-day (the economic threshold was approximately $26/MW-day); the second was during the 2020-2021 PRA when Zone 7 cleared in shortage at CONE. Even during the 2015-2016 Planning Resource Auction, when the ACP in LRZ 4 cleared at $150/MW-day, the economic withholding threshold was $180/MW-day. MISO is

not proposing further mitigation so as to prevent shortage price suppression which could exacerbate potential revenue sufficiency issues. Existing ZRC Offer mitigation measures will be retained, including the threshold for economic withholding which remains set at 10% of CONE (approximately $25/MW-day) above a default reference level of $0. Market Participants desiring to offer above the economic withholding threshold will need to request and obtain facility or technology specific reference levels in consultation with the IMM that consider relevant costs per section 64.1.4 of Module D. Such Reference Levels have historically accounted for a small fraction of ZRC Offers in the annual Planning Resource Auctions.

Q. How could the Auction Clearing Price adjustments result in revenue sufficiency issues for Market Participants that clear ZRCs in Seasons where adjustments occur?

A. Market Participants that obtain facility-specific Reference Levels or are otherwise not subject to the economic withholding provisions of Module D, for example Demand Response, may submit ZRC Offers for individual Seasons up to a cap which will be set at annual CONE divided by the number of days in the Season, approximately $1,000/MW-day. When an LRZ clears with two or more Seasons in shortage or near shortage conditions, the final ACPs for those Seasons are reduced below the marginal offer (or CONE when short) that was used to clear the auction. As a result, cleared ZRC Offers would exceed the final ACPs. Assuming the cleared ZRC Offers reflect the actual costs associated with the Planning Resource, Market Participants may not recover their costs. This would

necessitate a payment or credit to ensure the Resource recovers its costs, but no more, to incentivize it to meet its capacity commitment in all Seasons in which it cleared.

Q. How is MISO proposing to formulate make-whole provisions?

A. In concept, make-whole payments compare market revenues to costs and provide credits to the extent costs exceed revenues. In energy markets, costs are computed based upon resource offers, assuming they reflect the costs of producing energy. ZRC Offers may not reflect the actual costs of providing capacity if a Planning Resource clears in multiple Seasons but its annual costs are compressed into each season's ZRC Offer to ensure recovery if the Resource only clears in a single Season. To account for this, MISO proposes a make-whole provision, defined as the ZRC Offer Revenue Sufficiency Credit, that considers a Resource's revenues from all cleared Seasons and credits a Resource if needed to meet the minimum of the following amounts: (i) the sum of cleared ZRC Offer price segments multiplied by the cleared ZRC Offer Volumes multiplied by the number of days in the Season; (ii) annual CONE; or (iii) the applicable reference level costs for resources that obtained technology or facility-specific Reference Levels for cleared Seasons. This formulation will prevent the ZRC Offer Revenue Sufficiency Credit from contributing to over-recovery of costs.

Q. Who will pay for ZRC Offer Revenue Sufficiency Guarantee Credits and how will they be distributed?

A. Charges to fund ZRC Offer Revenue Sufficiency Guarantee Credits will be distributed to Market Participants representing LSEs in the LRZs experiencing

shortage or near shortage conditions *pro rata*, based on their respective LSEs' share of PRMR minus the PRMR associated with the Capacity Deficiency Charge within the LRZs during the Seasons where ACPs were reduced. The allocation is similar to the allocation of the Zonal Deliverability Benefit which occurs when an LRZs ACP separates from the systemwide ACP due to limited import or export capability, which will occur whenever LRZs experience shortage or near shortage conditions.

Q. Should ZRC Offer Revenue Sufficiency Guarantee Credits occur frequently?

A. MISO expects that payment of ZRC Offer Revenue Sufficiency Guarantee Credits will be infrequent due to the conditions necessitating the payments that include: (i) LRZs, a group of LRZs, or a Sub-Regional Resource Zone must clear in shortage or near shortage conditions in more than one Season; (ii) ZRC Offers must exceed the final ACP for the applicable LRZs and Seasons; (iii) in order for ZRC Offers to exceed the economic withholding threshold, they must obtain facility-specific reference levels or be excluded from the economic withholding provisions of Module D; and (iv) the Planning Resource's actual costs associated with its ZRC Offer must exceed auction revenue credits for the Seasons cleared. As noted above, in past PRAs very low volumes of ZRCs have offered above the economic withholding threshold and the PRA has only cleared above the economic withholding threshold twice since the PRA began in 2013.

VI. <u>OUTAGE COORDINATION</u>

Q. What are the current RAN Phase 1 exemption rules for Generator Planned Outages?

A. Under the current RAN Phase 1 generator outage exemption rules, exemptions will be provided if one of the following conditions are met:
(1) The Generator Owner or Generator Operator schedules its first Generator Planned Outage 120 days or more in advance of the outage start date and 120 days or more beyond the end date of any previously scheduled outages for the unit; (2) Subsequent generator unit outage requests 120 days or more in advance and Generator Owners or Generator Operators Generator Planned Outage less than 120 days in advance and at least 14 days in advance of outage start date. Proposed Generator Planned Outage to occur entirely during a period that the subregion containing the generator unit has an adequate projected margin, at the time the outage is provided to the Transmission Provider. There is adequate margin when the Maintenance Margin is greater than or equal to zero megawatts after subtracting the megawatts of the requested Proposed Generator Planned Outage. The request shall be determined based on highest queued request; or (3) Generator Owner or Generator Operator reschedules its Generator Planned Outage at the Transmission Provider's request, including outages submitted less than 14 days in advance of the start date.

Q. What is MISO's proposal for exemption of Generator Planned Outages?

A. MISO worked with stakeholders to develop an exemption process that integrates with the tiered accreditation calculations in Schedule 53. The three levels are: Full exemption for Generator Planned Outages (from Tier 1 and Tier 2 SAC calculations in Schedule 53), partial exemption (only exempt in Tier 1 SAC calculations), and no exemption. The following chart illustrates the proposed

exemption requirements, please note that Maintenance Margin is currently calculated and posted for MISO's north, central, and south sub-regions separately:

Generator Outage Submission Criteria	**Maintenance Margin >=0 for duration of outage**	**Maintenance Margin <0 for any day in the duration of outage**
>120 days prior to outage start date, and >120 days from end of previous outage for unit	Exempt Tier 1 & 2	Exempt Tier 1 Only
>120 days Prior to Outage Start date and <120 days from end of Previous outage for unit or Outage submitted between 31-119 days Prior to outage start date	Exempt Tier 1 Only	No Exemption
14-30 days prior to outage start date and passes No Harm Test	Exempt Tier 1 Only	No Exemption
Outage moved per MISO request	Exempt Tier 1 & 2 (Weather, forced outages, other conditions in BPM-008)	Exempt Tier 1 & 2 (Weather, forced outages, other conditions in BPM-008) at Transmission Provider's discretion

A more detailed description of how to procure Generator Planned Outage Exemptions are provided in proposed Schedule 53.

Q. What is the No Harm Test?

A. No harm tests will include, but will not be limited to outage approval, compliance with all applicable operation guides, review of possible conflicting outages or system conditions, and forecasts of system capacity (Maintenance Margin, Multiday Operational Margin, 30-day margin). It will also include criteria outlined in the Business Practices Manual for Outage Coordination, specifically: the ability to maintain voltage required by nuclear generation resources, or to

meet any other nuclear plant interface requirements; the ability to maintain the Transmission System within system operating limits using normal (non-emergency) operating procedures or restore the Transmission System to normal operating conditions following a single contingency with the use of normal (non-emergency) operating procedures; or does not have the potential for credible contingencies to significantly affect Transmission System reliability of metropolitan areas.

Q. How will MISO treat planned outages that were submitted before this proposal goes into effect?

A. MISO proposes a transition with a bright line distinction based on whether a planned outage is scheduled to start prior to September 1, 2022. Planned outages submitted since spring 2019 are coded as exempt or not in the Control Room Operations Window ("CROW") under RAN Phase 1. Where coded exempt, those resources will be treated as fully exempt for Tier 1 & 2 in the calculations proscribed in Schedule 53 even though they may not have met both of the primary requirements of (1) being submitted 120 days or greater in advance and (2) leaving positive Maintenance Margin in the subregion for the duration of the outage. MISO believes this approach is appropriate as it has been highlighting the risks to capacity sufficiency from correlated planned outages since September 2017 and ongoing efforts to encourage sufficient outage coordination and improve tools and processes have greatly reduced the frequency of MaxGens declared in Spring and Fall since RAN Phase 1 went into effect.

Q. Describe MISO's authority related to coordination of generator outages.

A. Under the Tariff (section 38.1.1.e titled "Scope of Services") MISO is required to "Coordinate maintenance schedules for Generation Resources and approve, coordinate, and reschedule as necessary Planned Transmission Outages operated within the Transmission Provider Region." MISO does not have the authority to deny generation outages, but the existing tariff does allow MISO's accreditation of Planning Resources to be reduced based on insufficient coordination of Generator Planned Outages.

Q. What changes are being proposed to MISO's generation outage exemption rules under the proposal?

A. Given the strong correlation between high outage levels and MaxGens, modifications to MISO's outage coordination processes and procedures will be implemented to enhance the determination of SAC for Resources subject to Schedule 53.

Q. What changes are being proposed to the rules governing the exemption of Generator Planned Outages for accreditation purposes?

A. Outage exemptions will usually be given at the time of outage submittal review or in response to a CROW ticket change request. The purpose of the exemption is to ensure that a Resource's accreditation is not negatively impacted by unavailability associated with a sufficiently coordinated outage. Exemptions are granted based outage lead time criteria and adequate Maintenance Margin as outlined above. A generation outage ticket submitted into CROW will be reviewed to determine if such outage is exempt from accreditation impacts under Schedule 53. Outage approvals and exemptions have separate purposes and criteria but bridge the gap

between the planning and operational horizons. As is the case today, approvals will be based on reliability analysis in the Outage Coordination process. The outage will receive exemption from the SAC calculation if it meets the criteria outlined above. It should be noted that the exemption status of an outage does not impact whether it is "approved" in the Outage Coordination processes. Outage exemptions will usually be given at the time of outage submittal review or in response to a CROW ticket change request. The purpose of the exemption is to ensure that resources are not penalized for unavailability for a sufficiently coordinated outage. The criteria for exemptions are outage lead time and adequate Maintenance Margin.

VII. MARKET MONITORING AND MITIGATION

Q. Will MISO's current market monitoring and mitigation provisions be modified to address market power concerns in the new seasonal construct?

A. Yes, current market monitoring and mitigation provisions have been modified in the submitted tariff redlines and substantive enhancements regarding physical and economic withholding are discussed below.

Q. Please describe how physical withholding of Zonal Resource Credit offers into the PRA will be affected.

A. The move to seasonal auctions calls for minor modifications that ensure these same protections continue to work going forward. Primarily, it is the exclusions from auction participation in Section 64.1.1.g of Module D that need to be adapted for a seasonal approach. In one more substantive change in that section, MISO proposes removing the preclusion from participation for a resource that

expects to be on outage for greater than 90 of the first 120 days of the Planning Year and replacing that with a provision that says an Market Participant with a resource that has submitted an outage for greater than 31 days of a Season can ask the IMM for a determination ahead of the auction allowing it to forego offering excess ZRCs from the resource without being deemed to have engaged in Physical Withholding.

Q. Please explain about how Economic Withholding will be affected.

A. MISO is not proposing to change the initial reference level, economic withholding threshold. The initial reference level remains at $0 and the economic withholding threshold is 10% of CONE above $0, which currently would make ~$25/MW-day the effective offer cap unless an MP gets a facility-specific Reference Level or uses Default Technology Specific Avoidable Costs at which point it becomes the economic withholding threshold for the resource. It is expected that more resources will request facility-specific Reference Levels or use Default Technology Specific Avoidable Costs to help ensure they can cover their costs when they might only clear for one Season instead of the full Planning Year under the current construct.

Q. Do you believe the proposed enhancements are just and reasonable changes to the MISO Tariff?

A. Yes. For the reasons set forth above and in the supporting testimonies of Messrs. Wright and Smith, the proposal set forth in this filing is both just and reasonable and is needed now to help ensure the continued reliability of the MISO Region through enhancements to MISO's Resource Adequacy construct. For this reason,

MISO urges the Commission to accept the proposed Tariff enhancements to be effective for the 2023 – 2024 PRA.

Q. Does this conclude your testimony?

A. Yes.

Affidavit of Shawn McFarlane

COUNTY OF HAMILTON)
)
STATE OF INDIANA)

Shawn McFarlane, being duly sworn, deposes and states that he prepared the Prepared Direct Testimony of Shawn McFarlane, and the statements contained therein are true and correct to the best of his knowledge and belief.

/s/ Shawn McFarlane

Shawn McFarlane

SUBSCRIBED AND SWORN BEFORE ME, this 30th day of November, 2021.

My Commission Expires:

My County of Residence:

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 199
MISO Winter Storm Fern Summary



Overview of Winter Storm Fern

Reliability Subcommittee

February 17, 2026

Executive Summary



- Winter Storm Fern brought extreme cold, snow and ice across the MISO footprint, which created operational challenges including forecasting errors, unit availability, and low wind production
- To maintain reliability, two Maximum Generation Events - Step 2c were declared on January 24 allowing MISO access to generation unit emergency ranges, load modifying resource curtailments, and emergency power purchases
- MISO is actively engaging in solutions to address the challenges that arose during the event

Proactive and on-going planning prepared MISO for this winter storm

MISO regularly coordinates with our neighbors during events and normal operations

SYSTEM TOPOLOGY

- Highly inter-connected grid across 15 states and Manitoba
- Diverse generation mix
- Relationships with seams partners

ON-GOING

- Coordinated Seasonal Assessments (Winter)
- Winter Readiness Workshops
- Emergency Procedure Drills

PRE-EVENT

- Issued Informational Advisories & Cold Weather Alert
- Daily coordination with neighbors
- Declared Conservative Operations

EVENT

January 24, 2026

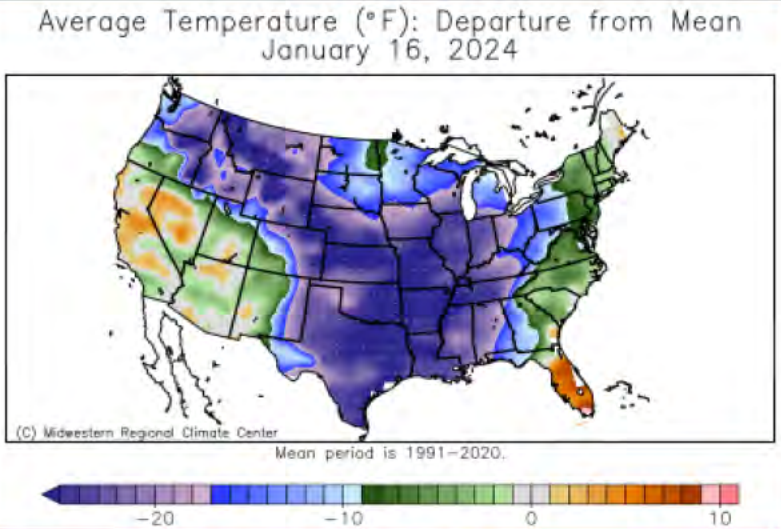
- Max Generation Event Step 2c – North and Central Regions
  - Emergency Ranges
  - Utilized LMRs
  - Emergency Power Purchase from PJM

January 26, 2026

- Capacity Advisory – North and Central Regions

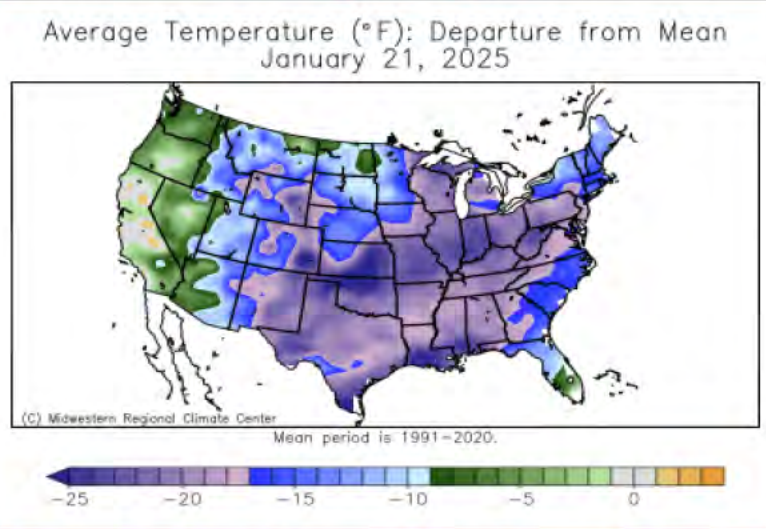
While all occurring in January over the last three years, each winter event has unique characteristics that require different actions

WINTER STORM HEATHER
January 13-17, 2024



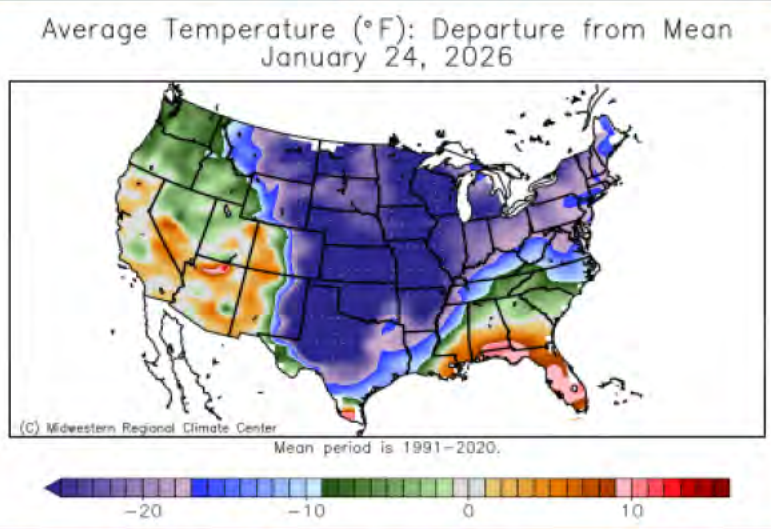
System Peak Load (January 16, 2024)	105 GW
Incremental Unplanned Outages	4 GW
Scheduled Load Modifying Resources*	0 MW
RDT Max Flow & Direction	2.6 GW N-S
Average Daily Wind Generation	20.0 GW
Precipitation: Moderate snowfall across MISO's South and Central regions	

WINTER STORM ENZO
January 18-22, 2025



System Peak Load (January 21, 2025)	107 GW
Incremental Unplanned Outages	10 GW
Scheduled Load Modifying Resources*	1.2 GW
RDT Max Flow & Direction	2.7 GW N-S
Average Daily Wind Generation	15.4 GW
Precipitation: Modest snowfall across MISO's North and Central regions	

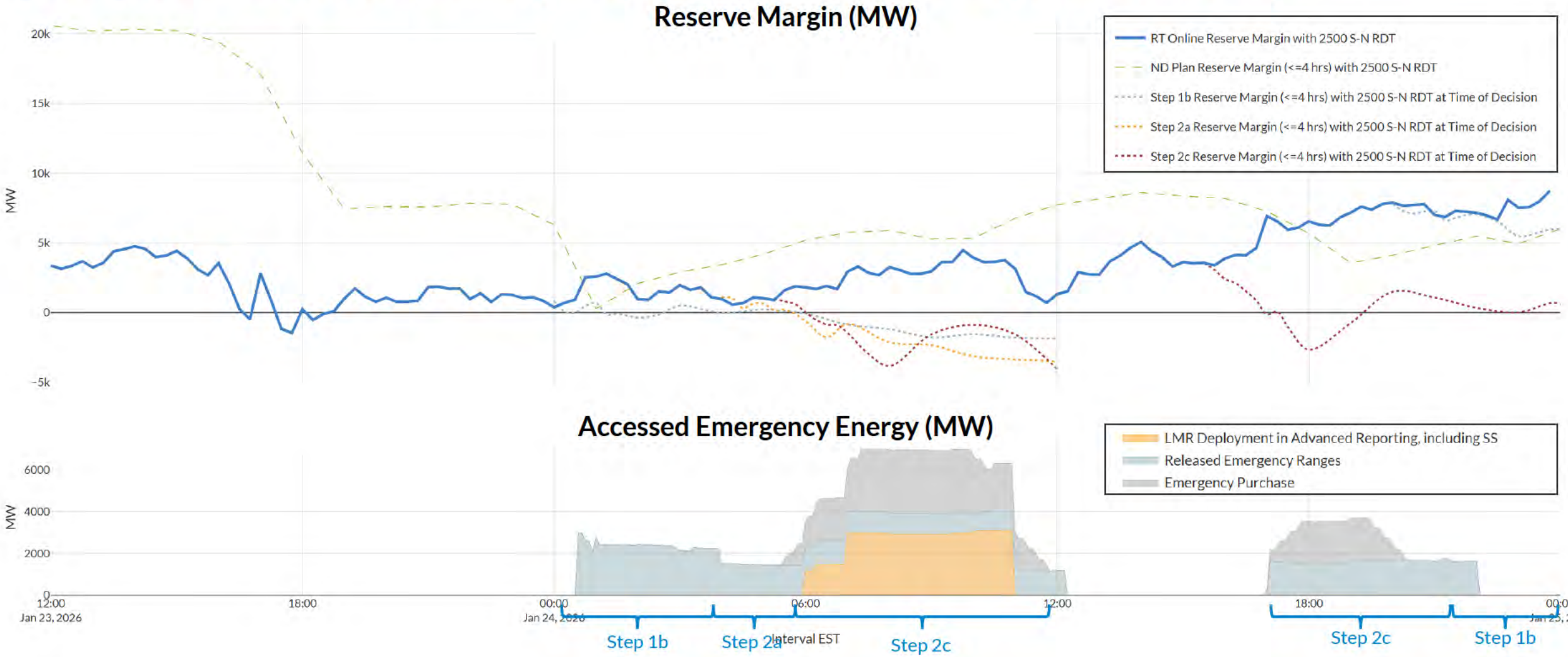
WINTER STORM FERN
January 22-27, 2026



System Peak Load (January 27, 2026)	105 GW
Incremental Unplanned Outages	6 GW
Scheduled Load Modifying Resources	2.0 GW
RDT Max Flow & Direction	4.0 GW S-N
Average Daily Wind Generation	3.1 GW
Precipitation: Significant snowfall across MISO's South and Central regions, significant icing in the South region	

Load Modifying Resources requested for the peak load hour for the noted storm time period

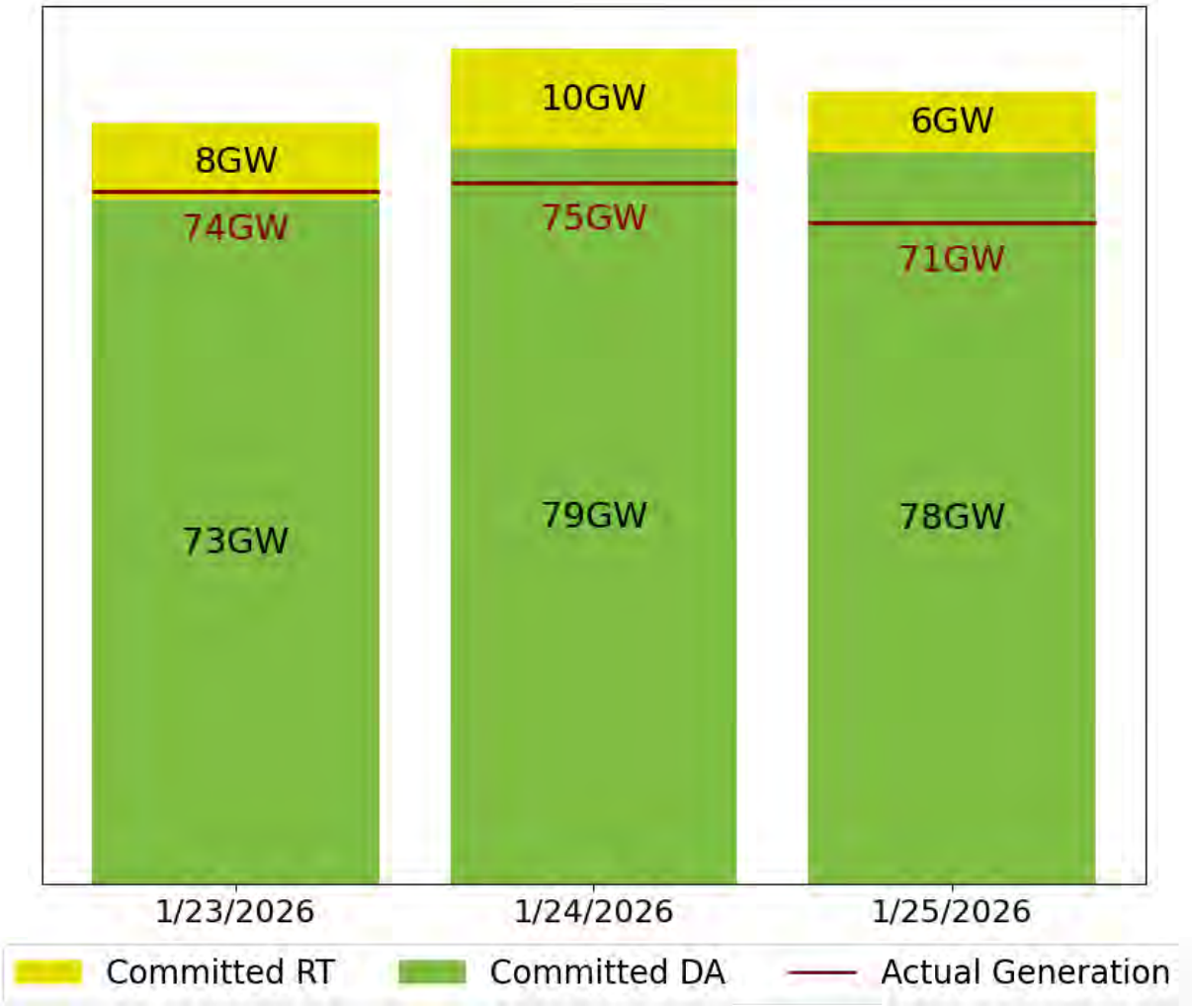
Persistent negative capacity margins in the North and Central regions on January 24 prompted MISO to take emergency actions to maintain system reliability



Event step times are approximate, for exact times see slide 11 in the appendix
RT = Real Time and ND = Next Day

Significant unplanned outages caused by the extreme cold contributed to the need for MISO to commit all available resources in real time

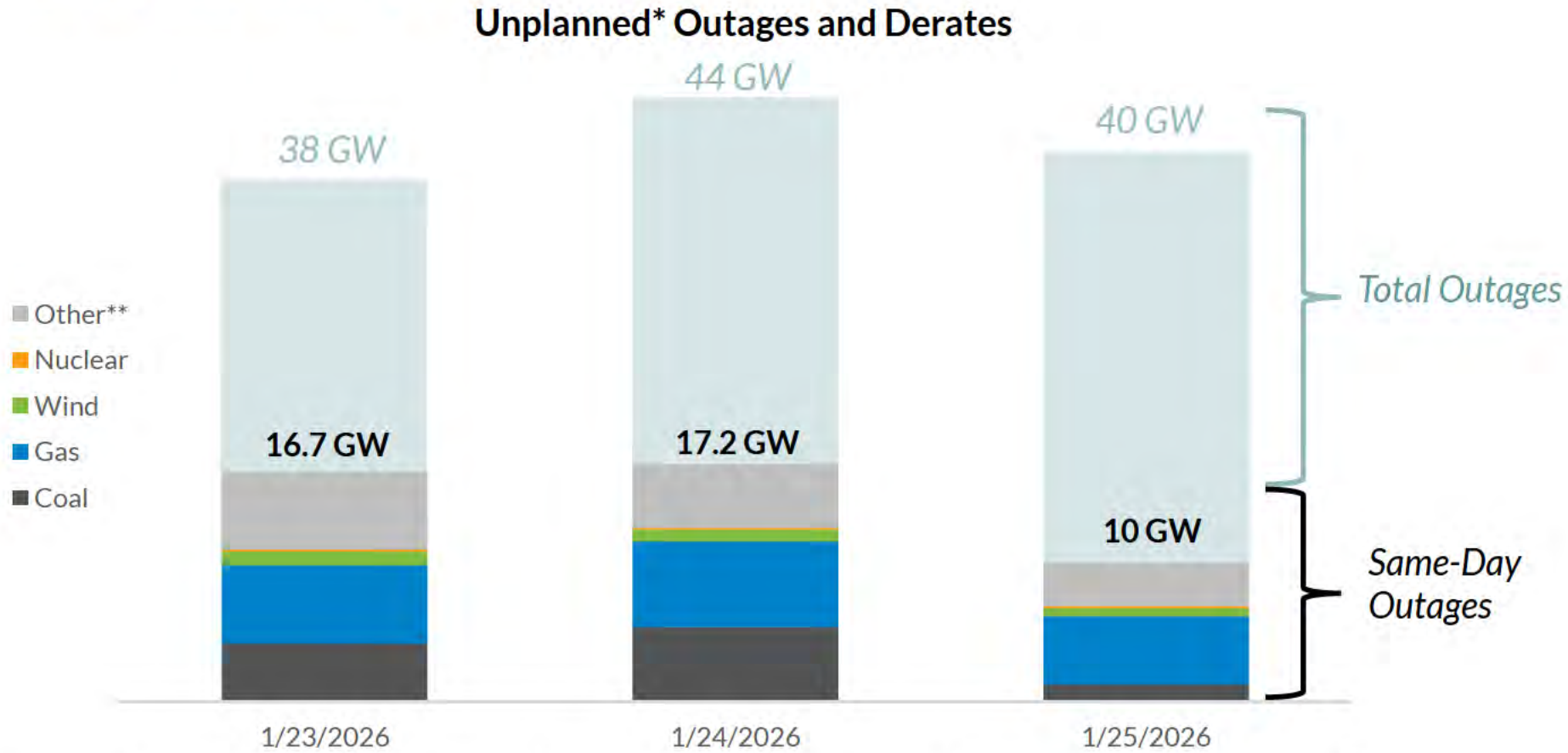
Daily Committed Thermal Unit Capacity in DART & Actual Generation at Peak Hour



Extended Combustion Turbine (CTs) lead times hindered real-time commitments

- In the North and Central regions 29 CTs increased their start times significantly on January 23
- 13 of those remained under the 24-hour notification threshold to maintain maximum accreditation value

MISO experienced significant unplanned outages due to the extreme cold mostly in the North and Central Region



Percentage of total unplanned outages that occurred in the North/Central regions*	*82%*	*80%*	*77%*

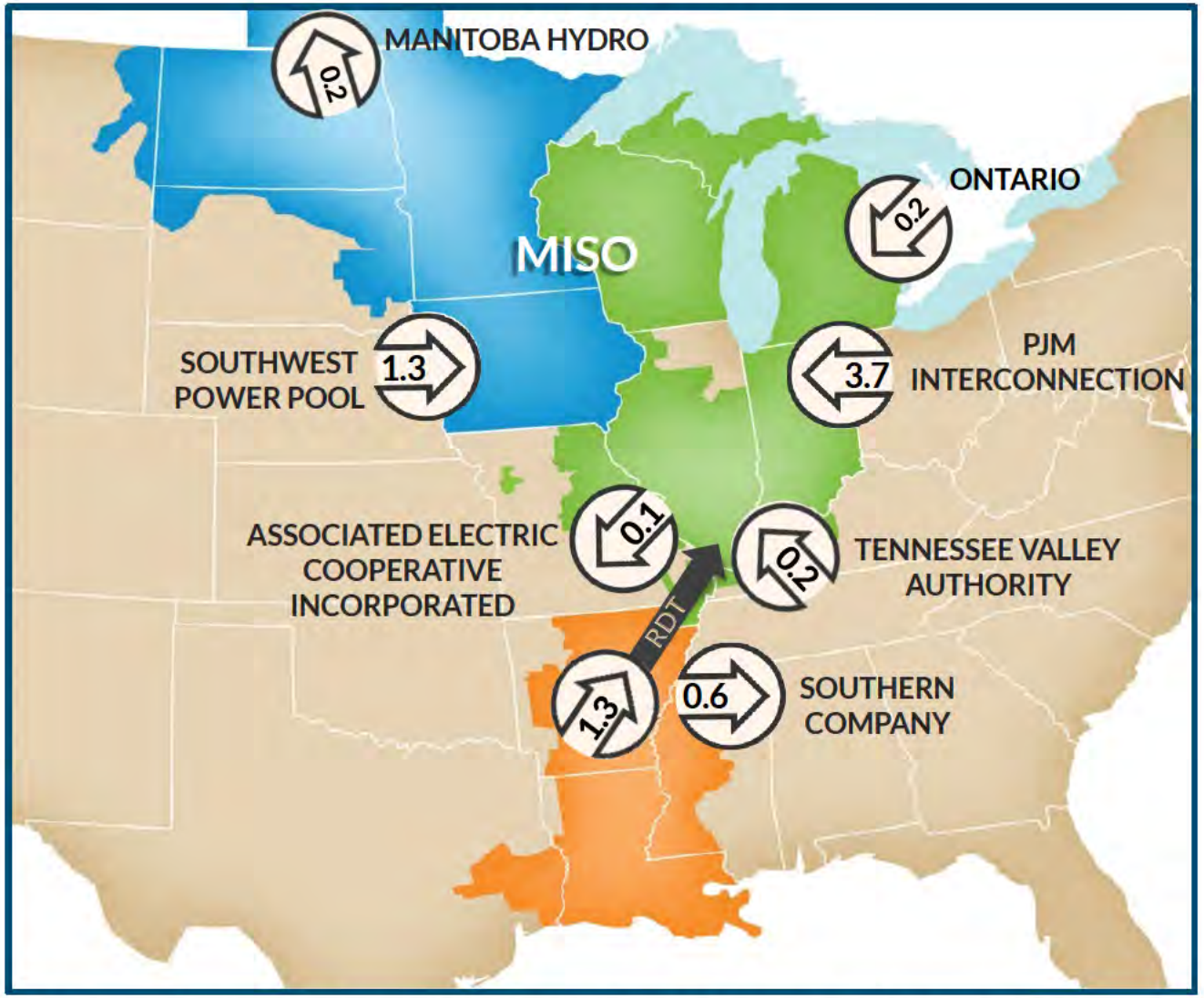
**Unplanned includes emergency, urgent and forced outages and derates. Charts reflect data in the CROW outage system on January 26, 2026. Wind often reported as derated over the time period.*

*** Other includes Oil, Hydro, Petroleum Coke, Waste, Behind the Meter Generation, and units not in the market footprint*

Emergency prices were not published for eleven hours on January 24 due to technical issues; as a result, prices did not reflect emergency conditions and imports were not properly incentivized

Imports from PJM were driven by emergency energy purchases

Average Net Scheduled Interchange (GW)
January 24, 2026



RDT = Regional Directional Transfer, which has a North-South limit of 3.0 GW and South-North limit of 2.5 GW

Challenges that impacted operations during Winter Storm Fern are already being addressed with solutions

Proactive Communication
MISO coordinated with members to maximize transmission and generation availability

Staffing Support
Extra operators, including dual-qualified operators, ensured MISO had the experienced personnel needed

Coordination with Neighbors
PJM provided emergency energy that was key to addressing capacity concerns

LESSONS LEARNED

- **Tailored Operating Instruction:** There was a lack of clarity in operating instruction regarding public appeals; enhanced functionality in Operator Interface will be implemented by this summer
- **Pricing Fix** - Ex-Post LMPs were not calculated or published for ~11 hours due to a software issue; a fix was implemented on February 5, 2026
- **Reserve Procurement and Deliverability** - Reserves offered into the market were stranded in the south but Look Ahead Commit (LAC) could not differentiate; enhancement will be delivered this year
- **Uncertainty Forecasting and Peak Hour Planning** - Enhancements needed to improve uncertainty forecasting model, and we need to move away from peak hour planning and assess the operating plan across all hours of the operating day
- **Emergency Pricing** – Emergency prices were observed in the non-emergency South region; cause TBD but needs to be addressed

Appendix



Sequencing of alert, warning and events during winter storm Fern

ALERTS

Cold Weather Alert (System Wide)
Jan 23, 00:00 EST – Feb 01, 23:59 EST

Conservative Operations (System Wide)
Jan 23, 20:00 EST – Jan 29, 23:59 EST

Conservative Operations (MISO South)
Jan 30, 00:01 EST – Feb 01, 23:59 EST

WARNING

Capacity Advisory (North and Central)
Jan 29, 00:00 EST – Jan 29, 23:59 EST

Max Generation Warning (North and Central)
Jan 24, 12:00 EST – Jan 24, 17:00 EST

EVENTS

Max Gen Event Step 1b (North and Central)
Jan 24, 00:30 EST – Jan 24, 04:36 EST

Max Gen Event Step 2a (North and Central)
Jan 24, 04:36 EST – Jan 24, 06:01 EST

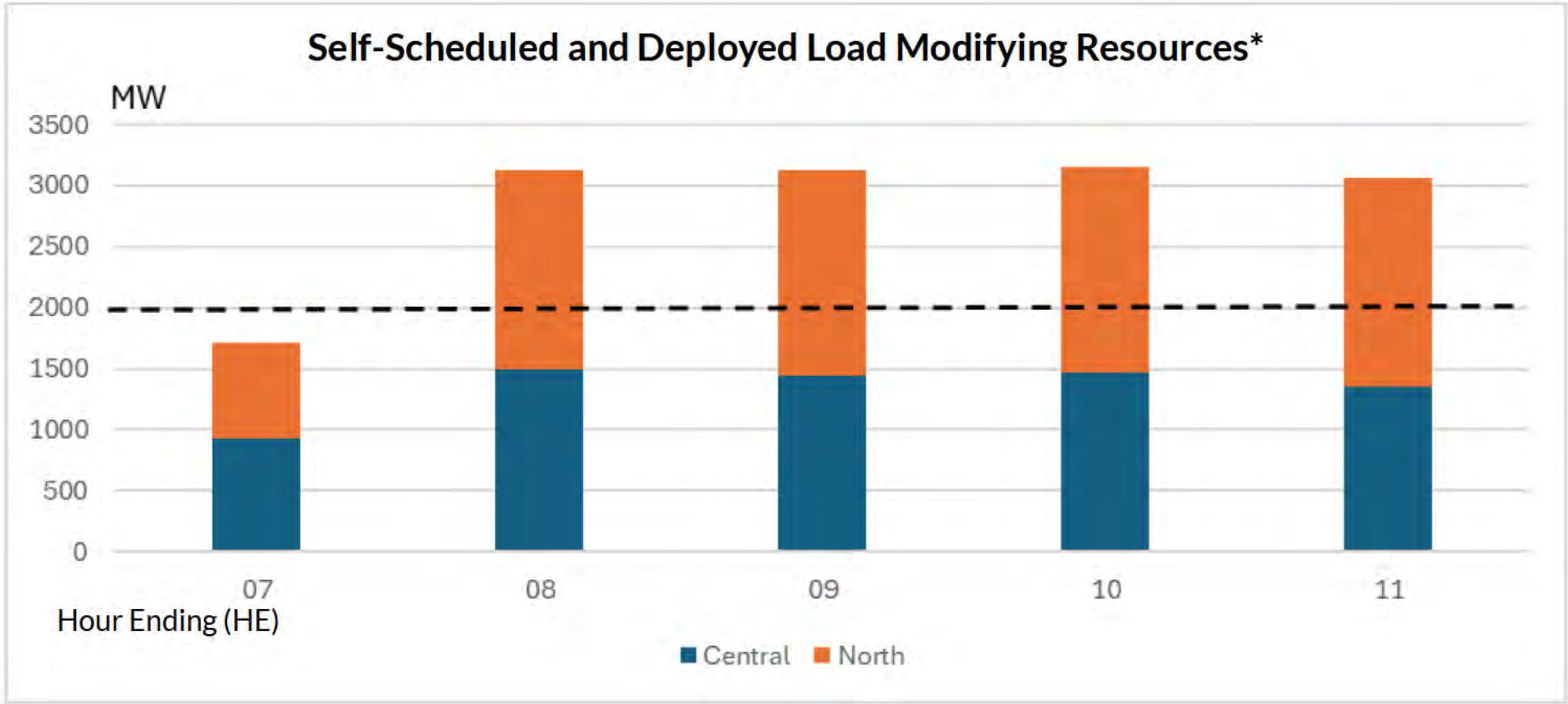
Max Gen Event Step 2c (North and Central)
Jan 24, 06:01 EST – Jan 24, 12:00 EST

Max Gen Event Step 2c (North and Central)
Jan 24, 17:00 EST – Jan 24, 21:00 EST

Max Gen Event Step 1b (North and Central)
Jan 24, 21:00 EST – Jan 24, 23:59 EST

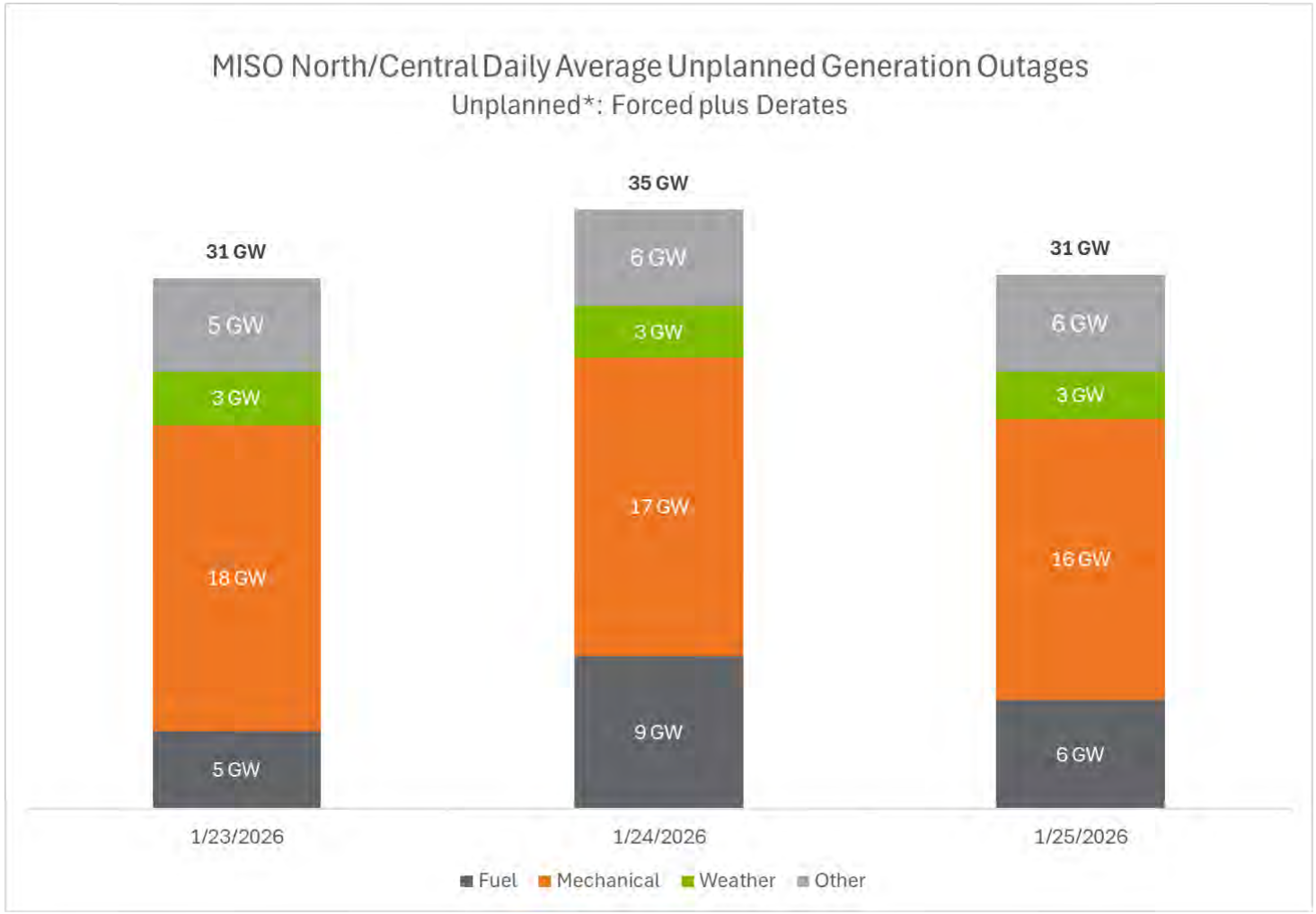
Note: All times indicate the effective time of each declaration

As part of the EEA2 declaration, MISO deployed ~2 GW of Load Modifying Resources in addition to the self-scheduled amount in the North and Central regions



*MP Acknowledgement of MISO scheduling instructions

MISO experienced an increase of unplanned and derated outages due to fuel-related issues in the North and Central regions



*Unplanned = forced outages and derates, Charts reflect data in the CROW outage system on January 26, 2026, Wind often reported as derated over the time period

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 200
CenterPoint Culley Discovery Response

Despite references in this document to the presence of confidential information, all confidential information has been redacted by Public Interest Organizations, and the document's sponsor has indicated no objection to public circulation of the redacted document.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED APPLICATION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A CENTERPOINT ENERGY INDIANA SOUTH FOR (1) ISSUANCE OF AND A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR A FEDERALLY MANDATED CULLEY 202(c) COMPLIANCE PROJECT; (2) APPROVAL OF THE PROJECTED FEDERALLY MANDATED COSTS ASSOCIATED WITH THE CULLEY 202(c) COMPLIANCE PROJECT; (3) AUTHORITY FOR THE TIMELY RECOVERY OF 80% OF THE FEDERALLY MANDATED COSTS THROUGH CEI SOUTH'S ENVIRONMENTAL COST ADJUSTMENT MECHANISM ("ECA MECHANISM"); (4) AUTHORITY TO DEFER 20% OF THE FEDERALLY MANDATED COSTS FOR RECOVERY IN CEI SOUTH'S NEXT GENERAL RATE CASE; (5) APPROVAL OF SPECIFIC RATEMAKING AND ACCOUNTING TREATMENT; (6) APPROVAL TO AMORTIZE THE CULLEY 202(c) COMPLIANCE PROJECT COSTS; (7) APPROVAL OF ONGOING REVIEW OF THE CULLEY 202(c) COMPLIANCE PROJECT; AND (8) APPROVAL TO ADJUST PETITIONER'S AUTHORIZED NET OPERATING INCOME TO REFLECT ANY APPROVED EARNINGS ASSOCIATED WITH THE CULLEY 202(C) COMPLIANCE PROJECT FOR PURPOSES OF IND. CODE § 8-1-2-42(d)(3); ALL PURSUANT TO IND. CODE § 8-1-8.4-1 *et seq.*, § 8-1-2-19, § 8-1-2-23, AND § 8-1-2-42.	**CAUSE NO. 46350**

CENTERPOINT ENERGY INDIANA SOUTH'S RESPONSE TO CAC'S SECOND SET OF DATA REQUESTS

Southern Indiana Gas & Electric Company d/b/a CenterPoint Energy Indiana South ("CEI South") pursuant to 170 IAC 1-1.1-16 and the discovery provisions of Rules 26 through 37 of the Indiana Rules of Trial Procedure, by its counsel, hereby submits the following Objections and Responses to the Citizen's Action Coalition's ("CAC") Second Set of Data Requests dated June 25, 2026 ("Requests").

General Objections

All of the following General Objections are incorporated by reference in the response to each of the Requests:

1. The responses provided to the Requests have been prepared pursuant to a reasonable and diligent investigation and search conducted in connection with the Requests in those areas where information is expected to be found. To the extent the Requests purport to require more than a reasonable

and diligent investigation and search, CEI South objects on grounds that they include an undue burden or unreasonable expense.

2. CEI South objects to the Requests to the extent they seek documents or information which are not relevant to the subject matter of this proceeding and which are not reasonably calculated to lead to the discovery of admissible evidence.

3. CEI South objects to the Requests to the extent they seek responses and information from individuals and entities who are not parties to this proceeding and to the extent they request the production of information and documents not presently in CEI South's possession, custody or control. CEI South further objects to the Requests to the extent they are (i) vague and ambiguous as to the individuals and entities to whom the Request refer, or (ii) overbroad and not reasonably calculated to lead to the discovery of relevant or admissible evidence.

4. CEI South objects to the Requests to the extent they seek an analysis, calculation, or compilation which has not already been performed and which CEI South objects to performing.

5. CEI South objects to the Requests to the extent they are vague and ambiguous and provide no basis from which CEI South can determine what information is sought.

6. CEI South objects to the Requests to the extent they seek information outside the scope of this proceeding, and as such, the Requests seek information not reasonably calculated to lead to the discovery of relevant or admissible evidence.

7. CEI South objects to the extent the Requests purport to require production of (a) information in a particular format; (b) multiple copies of the same document; (c) additional copies of the same document merely because alterations, notes, comments, or other material appear thereon when such other material is not material or relevant; and (d) copies of the same information in multiple formats on the grounds that it is irrelevant, overbroad, unreasonably burdensome and not required by the Commission rules and inconsistent with practice in Commission proceedings.

8. CEI South objects to the Requests to the extent they solicit copies of voluminous documents.

9. CEI South objects to the Requests to the extent the discovery sought is unreasonably cumulative or duplicative; or is obtainable from some other source that is more convenient, less burdensome, or less expensive.

10. CEI South objects to the Requests to the extent the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in litigation, and the importance of the proposed discovery in resolving the issues.

11. CEI South objects to the Request on the grounds that it is overbroad, unreasonably burdensome and seeks information that is largely irrelevant to the subject matter of this proceeding.

12. CEI South objects to the Requests to the extent they seek information that is confidential, proprietary, competitively sensitive and/or trade secret.

13. The responses constitute the corporate responses of CEI South and contain information gathered from a variety of sources. CEI South objects to the Requests to the extent they request identification of and personal information about all persons who participated in responding to each data request on the grounds that it is overbroad, unreasonably burdensome and irrelevant given the nature and scope of the requests and the many people who may be consulted about them. CEI South further objects to the Requests to the extent they purport to require identification of a witness who can answer questions regarding the substance of or origination of information supplied in each response on the ground that CEI South has no obligation to call witnesses to testify as to information provided in discovery.

14. CEI South objects to the Requests to the extent they seek information that is subject to the attorney-client, work product, settlement negotiation or other applicable privileges. CEI South further objects to the Requests to the extent they purport to require the creation of a privilege log on the grounds that given the extremely expedited and informal nature of discovery in this proceeding, contemporaneous privilege logs are inappropriate. CEI South objects to the Requests on the grounds they are unreasonably burdensome, overbroad, inconsistent with discovery practices in Commission proceedings and inconsistent with the informal discovery process applicable to this proceeding.

15. CEI South assumes no obligation to supplement these responses except to the extent required by Ind. Tr. R. 26(E) (1) and (2) and objects to the extent the instructions and/or Requests purport to impose any greater obligation. CEI South denies that Ind. Tr. R. 26(E)(3) applies to the Requests.

Subject to and without waiver of the general and specific objections set forth herein, CEI South responds to the Requests in the manner set forth below.

Confidential information in green

Data Requests – Set 02

2-1. Please provide the following information for Culley Unit 2:

a) hourly net generation since December 23, 2025 and its MISO dispatch status during this time (e.g., Must-Run, Economic, Outage, etc.);
b) total costs and revenues since December 23, 2025;
c) identification of each forced outage, when it occurred, and for how long, since December 23, 2025;
d) the anticipated timing and purpose of any current unforced outages or planned outages later this year; and
e) the total capital investment and maintenance expense expected to be made from December 23, 2025, through the end of the current 202(c) order period and through the end of 2026 assuming 202(c) order extensions through this time.

Objection: Petitioner objects to the Request on grounds and to the extent the Request seeks information that is trade secret or other proprietary, confidential, and competitively sensitive business information of Petitioner, its customers, or its vendors. Petitioner has made reasonable efforts to maintain the confidentiality of this information. Such information has independent economic value and disclosure of the requested information would cause an identifiable harm to Petitioner, its customers, or its vendors. The responses are "trade secret" under law (Ind. Code § 24-2-3-2) and entitled to protection against disclosure. See also Indiana Trial Rule 26(C)(7). All responses containing designated confidential information are being provided pursuant to non-disclosure agreements between Petitioner and the receiving parties.

Petitioner further objects to subpart e) of this Request on the separate and independent grounds and to the extent that it assumes Petitioner has capitalized costs associated with compliance with the DOE 202(c) orders as incorrect in its premise. Petitioner is tracking and deferring all costs associated with compliance but has not, to date, capitalized such costs.

Subject to and without waiving the foregoing objection, CEI South provides the following response:

Response:

a) See the attached files marked 46350_CEIS_CAC 2-1(a) (CONFIDENTIAL)_Culley 2 gen data 12-13-25.csv and 46350_CEIS_CAC 2.1(a) (CONFIDENTIAL)_Culley 2 hourly DA-RT commit status.xlsx.
b) Through May 31, 2026 costs presently deferred total [redacted] offset partially by total revenues of [redacted]. Note that because CEI South has not yet filed for cost recovery through the FERC, these numbers are preliminary, have not yet been finalized or fully reviewed and therefore remain subject to change.
c) See table below:

Forced Outages	Days	Issue	Result
17-Jan-26	6	Turbine/Generator Issues	Generator repairs
27-Jan-26	2	Boiler Tube Leaks	Repaired leaks
25-Feb-26	2	Boiler Tube Leaks	Repaired leaks & Generator Issue Resolved
21-Mar-26	2	Boiler Tube Leaks	Repaired leaks
16-May-26	1	Boiler Tube Leaks	Repaired leaks

d) CEI South completed a planned outage to perform inspections, testing, and maintenance to maintain the unit's availability for MISO dispatch, including high-energy piping inspections, boiler maintenance, transformer testing, turbine valve inspections, and other maintenance of critical plant equipment. CEI South does not currently anticipate any additional planned outages for the remainder of 2026.

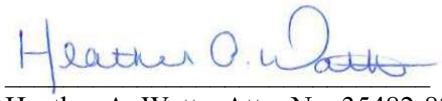
e) Maintenance expenses are estimated to be [redacted] through September 19, 2026, and [redacted] through December 31, 2026.

Attachments:

- 46350_CEIS_CAC 2-1(a) (CONFIDENTIAL)_Culley 2 gen data 12-13-25.csv
- 46350_CEIS_CAC 2.1(a) (CONFIDENTIAL)_Culley 2 hourly DA-RT commit status.xlsx

Dated: July 6, 2026

As to objections only,



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Jeffery A. Earl, Atty. No. 27821-64
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Attorneys for CEI South Southern Indiana Gas & Electric Company d/b/a/ CenterPoint Energy Indiana South

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
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Public Interest Organizations

Exhibit 201
January 2026 EPA CAMPD Data

State	Facility Name	Facility ID	Unit ID	Associated Stacks	Date	Hour	Operating Time	Gross Load (MW)	Steam Load (1000 lb/hr)	SO2 Mass (lbs)	SO2 Mass Measure Indicator	SO2 Rate (lbs/mmBtu)	SO2 Rate Measure Indicator	CO2 Mass (short tons)	CO2 Mass Measure Indicator	CO2 Rate (short tons/mmBtu)	CO2 Rate Measure Indicator	NOx Mass (lbs)	NOx Mass Measure Indicator	NOx Rate (lbs/mmBtu)	NOx Rate Measure Indicator	Heat Input (mmBtu)	Heat Input Measure Indicator	Primary Fuel Type	Secondary Fuel Type	Unit Type	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	0	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	1	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	2	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	3	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026		0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	5	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	6	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	7	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	8	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	9	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	10	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	11	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	12	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	13	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	1	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	15	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	16	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	17	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	18	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	19	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	20	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	21	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	22	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/20/2026	23	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	0	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	1	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	2	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	3	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026		0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	5	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	6	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	7	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	8	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	9	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	10	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	11	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	12	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	13	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	1	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	15	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	16	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	17	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	18	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	19	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	20	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	21	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	22	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/21/2026	23	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	0	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	1	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	2	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	3	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026		0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	5	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	6	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	7	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	8	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	9	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	10	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	11	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	12	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	13	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	1	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	15	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	16	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	17	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	18	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	19	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	20	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	21	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	22	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/22/2026	23	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	0	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	1	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	2	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	3	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026		0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	5	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	6	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	7	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	8	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	9	0																	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	10	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	11	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	12	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	13	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	1	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	15	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	16	1	1		1 751	MEASUR	0.1	CALC	1.252	MEASUR	0.103	CALC	1.171	MEASUR	0 096	CALC	12.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	17	1	5		8. 97	MEASUR	0.1 1	CALC	6.197	MEASUR	0.103	CALC	5.799	MEASUR	0 096	CALC	60.	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	18	1	36		76 8 6	MEASUR	0.173	CALC	5.52	MEASUR	0.103	CALC	6.589	MEASUR	0.105	CALC	3.7	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	19	1	50		105 877	MEASUR	0.176	CALC	61.662	MEASUR	0.103	CALC	71.523	MEASUR	0.119	CALC	601	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	20	1	51		122 016	MEASUR	0.198	CALC	63.316	MEASUR	0.103	CALC	72.199	MEASUR	0.117	CALC	617.1	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	21	1	52		131 652	MEASUR	0.207	CALC	65.38	MEASUR	0.103	CALC	76. 71	MEASUR	0.12	CALC	637.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	22	1	52		128.07	MEASUR	0.191	CALC	68.6 2	MEASUR	0.103	CALC	80.288	MEASUR	0.12	CALC	669.1	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/23/2026	23	1	52		120.126	MEASUR	0.192	CALC	6 .202	MEASUR	0.103	CALC	73.8 8	MEASUR	0.118	CALC	625.8	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	0	1	52		125 792	MEASUR	0.198	CALC	65.227	MEASUR	0.103	CALC	75.6 2	MEASUR	0.119	CALC	635.7	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	1	1	52		126 07	MEASUR	0.203	CALC	63.737	MEASUR	0.103	CALC	7 .537	MEASUR	0.12	CALC	621.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	2	1	52		119. 99	MEASUR	0.193	CALC	63. 99	MEASUR	0.103	CALC	75.505	MEASUR	0.122	CALC	618.9	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	3	1	52		115 207	MEASUR	0.191	CALC	62.026	MEASUR	0.103	CALC	73.76	MEASUR	0.122	CALC	60 .6	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026		1	52		118 902	MEASUR	0.196	CALC	62.366	MEASUR	0.103	CALC	7 .15	MEASUR	0.122	CALC	607.8	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	5	1	52		129.8	MEASUR	0.202	CALC	65.897	MEASUR	0.103	CALC	78 99	MEASUR	0.123	CALC	6 2.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	6	1	52		115 316	MEASUR	0.188	CALC	62.919	MEASUR	0.103	CALC	7 .826	MEASUR	0.122	CALC	613.3	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	7	1	52		121.2	MEASUR	0.201	CALC	61.785	MEASUR	0.103	CALC	7 .077	MEASUR	0.123	CALC	602.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	8	1	52		123.01	MEASUR	0.20	CALC	62.009	MEASUR	0.103	CALC	73.7	MEASUR	0.122	CALC	60 .	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	9	1	52		116 831	MEASUR	0.196	CALC	61.008	MEASUR	0.103	CALC	72.5 9	MEASUR	0.122	CALC	59 .6	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	10	1	52		112 798	MEASUR	0.196	CALC	58.983	MEASUR	0.103	CALC	69.569	MEASUR	0.121	CALC	57 .9	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	11	1	52		122 6 7	MEASUR	0.2	CALC	62.961	MEASUR	0.103	CALC	7 .867	MEASUR	0.122	CALC	613.7	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	12	1	52		121 991	MEASUR	0.201	CALC	62.28	MEASUR	0.103	CALC	7 .662	MEASUR	0.123	CALC	607	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	13	1	52		120 766	MEASUR	0.196	CALC	63.285	MEASUR	0.103	CALC	75.2 9	MEASUR	0.122	CALC	616.8	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	1	1	52		117. 53	MEASUR	0.19	CALC	62.092	MEASUR	0.103	CALC	73.839	MEASUR	0.122	CALC	605.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	15	1	52		116 867	MEASUR	0.195	CALC	61. 75	MEASUR	0.103	CALC	72. 9	MEASUR	0.121	CALC	599.1	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	16	1	52		116 692	MEASUR	0.206	CALC	58.036	MEASUR	0.103	CALC	69.566	MEASUR	0.123	CALC	565.6	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	17	1	52		11 689	MEASUR	0.193	CALC	60.983	MEASUR	0.103	CALC	72.521	MEASUR	0.122	CALC	59 .	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	18	1	52		98. 2	MEASUR	0.163	CALC	62.03	MEASUR	0.103	CALC	73.758	MEASUR	0.122	CALC	60 .6	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	19	1	52		11 .182	MEASUR	0.187	CALC	62.568	MEASUR	0.103	CALC	7 .398	MEASUR	0.122	CALC	609.8	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	20	1	52		131 098	MEASUR	0.211	CALC	63.611	MEASUR	0.103	CALC	75.6 1	MEASUR	0.122	CALC	620	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	21	1	52		111 508	MEASUR	0.193	CALC	59.385	MEASUR	0.103	CALC	70.031	MEASUR	0.121	CALC	578.8	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	22	1	52		102 378	MEASUR	0.173	CALC	60.70	MEASUR	0.103	CALC	72.18	MEASUR	0.122	CALC	591.7	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/2 /2026	23	1	52		118 7 8	MEASUR	0.197	CALC	61.87	MEASUR	0.103	CALC	72.366	MEASUR	0.12	CALC	603	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	0	1	52		128 9 5	MEASUR	0.215	CALC	61. 8	MEASUR	0.103	CALC	72. 96	MEASUR	0.121	CALC	599.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	1	1	52		121 995	MEASUR	0.201	CALC	62.336	MEASUR	0.103	CALC	73.505	MEASUR	0.121	CALC	607.5	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	2	1	52		115 722	MEASUR	0.187	CALC	63. 76	MEASUR	0.103	CALC	75. 76	MEASUR	0.122	CALC	618.7	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	3	1	52		11 285	MEASUR	0.19	CALC	61.658	MEASUR	0.103	CALC	72.703	MEASUR	0.121	CALC	600.9	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026		1	52		120.163	MEASUR	0.2	CALC	61.7 3	MEASUR	0.103	CALC	72.821	MEASUR	0.121	CALC	601.8	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	5	1	52		123.7	MEASUR	0.207	CALC	61.35	MEASUR	0.103	CALC	75.33	MEASUR	0.126	CALC	597.9	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	6	1	52		12 0 2	MEASUR	0.201	CALC	63.198	MEASUR	0.103	CALC	75.136	MEASUR	0.122	CALC	615.9	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	7	1	52		120. 03	MEASUR	0.196	CALC	63.1	MEASUR	0.103	CALC	7 . 63	MEASUR	0.121	CALC	615.	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	8	1	52		117.191	MEASUR	0.19	CALC	63.226	MEASUR	0.103	CALC	7 .56	MEASUR	0.121	CALC	616.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	9	1	52		3. 35	MEASUR	0.136	CALC	32.757	MEASUR	0.103	CALC	51.066	MEASUR	0.16	CALC	319.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	10	1	52		0	MEASUR	0	CALC	123.1	MEASUR	0.103	CALC	2 7.2	MEASUR	0 206	CALC	1200.1	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	11	1	52		0	MEASUR	0	CALC	115	MEASUR	0.103	CALC	253.	MEASUR	0 226	CALC	1121.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	12	1	52		0	MEASUR	0	CALC	120.8	MEASUR	0.103	CALC	257.8	MEASUR	0 219	CALC	1177.3	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	13	1	52		0	MEASUR	0	CALC	123	MEASUR	0.103	CALC	262.5	MEASUR	0 219	CALC	1198.7	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	1	1	52		0	MEASUR	0	CALC	12 .2	MEASUR	0.103	CALC	28 .	MEASUR	0 235	CALC	1210.1	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	15	1	52		0	MEASUR	0	CALC	115	MEASUR	0.103	CALC	228.7	MEASUR	0 20	CALC	1121.1	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	16	1	52		0	MEASUR	0	CALC	12 .7	MEASUR	0.103	CALC	233.3	MEASUR	0.192	CALC	1215	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	17	1	52		0	MEASUR	0	CALC	122.8	MEASUR	0.103	CALC	256.2	MEASUR	0 21	CALC	1197.2	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	18	1	52		0	MEASUR	0	CALC	12 .9	MEASUR	0.103	CALC	265.	MEASUR	0 218	CALC	1217.3	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	19	1	52		0	MEASUR	0	CALC	122.5	MEASUR	0.103	CALC	258	MEASUR	0 216	CALC	119 .	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	20	1	52		0	MEASUR	0	CALC	125	MEASUR	0.103	CALC	252.2	MEASUR	0 207	CALC	1218.	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	21	1	52		0	MEASUR	0	CALC	12 .7	MEASUR	0.103	CALC	267.	MEASUR	0.22	CALC	1215.3	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	22	1	52		0	MEASUR	0	CALC	106.3	MEASUR	0.103	CALC	301.5	MEASUR	0 291	CALC	1036	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Culley Generating Station	1012	2	CS023, MS2	1/25/2026	23	1	52		0	MEASUR	0	CALC	119.1	MEASUR	0.103	CALC	228.6	MEASUR	0.197	CALC	1160.	CALC	Coal		Dry bottom wall-fired boiler	Wet Limestone	Low NOx Burner Technology (Dry Bottom only)|Selective Catalytic Reduction	Electrostatic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS

State	Facil ty Name	Facility D	Unit ID	Associated Stacks	Da e	Hour	Operatin g me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass lbs)	SO2 Mass Measur e Indicato r	SO2 Rate (lbs/mm Btu)	SO2 Rate Measur e Indicato r	CO2 Mass (short tons)	CO2 Mass Measur e Indicato r	CO2 Rate (short tons/m mB u)	CO2 Rate Measur e nd cato r	NOx Mass (bs)	NOx Mass Measur e Indicato r	NOx Rate (lbs/mm Btu)	NOx Rate Measur e ndicato r	Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	0	1	52		0	MEASUR	0	CALC	121	MEASUR	0.103	CALC	235.8	MEASUR	0 2	CALC	1179.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	1	1	52		0	MEASUR	0	CALC	121.8	MEASUR	0.103	CALC	282.6	MEASUR	0 238	CALC	1187.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	2	1	52		0	MEASUR	0	CALC	123.1	MEASUR	0.103	CALC	37 .	MEASUR	0 312	CALC	1200	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	3	1	52		0	MEASUR	0	CALC	122.3	MEASUR	0.103	CALC	261.1	MEASUR	0 219	CALC	1192.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026		1	52		0	MEASUR	0	CALC	121.5	MEASUR	0.103	CALC	236.8	MEASUR	0 2	CALC	118 .1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	5	1	52		5	MEASUR	0.00	CALC	122	MEASUR	0.103	CALC	252	MEASUR	0 212	CALC	1188.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	6	1	52		0	MEASUR	0	CALC	12	MEASUR	0.103	CALC	261	MEASUR	0 216	CALC	1208.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	7	1	52		0	MEASUR	0	CALC	121.2	MEASUR	0.103	CALC	297.6	MEASUR	0 252	CALC	1181.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	8	1	52		0	MEASUR	0	CALC	12 .5	MEASUR	0.103	CALC	355.6	MEASUR	0 293	CALC	1213.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	9	1	52		0	MEASUR	0	CALC	11 .308	MEASUR	0.103	CALC	35 .1 6	MEASUR	0 318	CALC	1113.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	10	1	52		0	MEASUR	0	CALC	95.13	MEASUR	0.103	CALC	285.528	MEASUR	0 308	CALC	927.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	11	1	52		3 551	MEASUR	0.005	CALC	77.286	MEASUR	0.103	CALC	23 .226	MEASUR	0 311	CALC	753.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	12	1	52		10 3 1	MEASUR	0.015	CALC	71.973	MEASUR	0.103	CALC	211.131	MEASUR	0 301	CALC	701.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	13	1	52		56.13	MEASUR	0.08	CALC	68.897	MEASUR	0.103	CALC	100.733	MEASUR	0.15	CALC	671.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	1	1	52		68 079	MEASUR	0.105	CALC	66.312	MEASUR	0.103	CALC	78.198	MEASUR	0.121	CALC	6 6.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	15	1	52		113.61	MEASUR	0.176	CALC	66.278	MEASUR	0.103	CALC	80.111	MEASUR	0.12	CALC	6 6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	16	1	52		116 727	MEASUR	0.192	CALC	62.2	MEASUR	0.103	CALC	70.983	MEASUR	0.117	CALC	606.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	17	1	52		109 022	MEASUR	0.172	CALC	65.098	MEASUR	0.103	CALC	76.1 8	MEASUR	0.12	CALC	63 .5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	18	1	52		13 .107	MEASUR	0.191	CALC	72.171	MEASUR	0.103	CALC	83.709	MEASUR	0.119	CALC	703.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	19	1	52		113 86	MEASUR	0.177	CALC	65.999	MEASUR	0.103	CALC	77.185	MEASUR	0.12	CALC	6 3.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	20	1	52		112.38	MEASUR	0.176	CALC	65. 53	MEASUR	0.103	CALC	76.555	MEASUR	0.12	CALC	637.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	21	1	0		55 2 5	MEASUR	0.156	CALC	36.252	MEASUR	0.103	CALC	66. 17	MEASUR	0.188	CALC	353.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	22	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/26/2026	23	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	0	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	1	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	2	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	3	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026		0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	5	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	6	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	7	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	8	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	9	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	10	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	11	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/27/2026	12	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	13	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	1	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	15	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	16	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	17	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	18	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	19	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	20	0																	Coal		D y bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	21	0																	Coal		D y bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	22	0																	Coal		D y bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 27/2026	23	0																	Coal		D y bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	0	0																	Coal		D y bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precip tator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	1	0																	Coal		D y bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precip tator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	2	0																	Coal		D y bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precip tator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	3	0																	Coal		Dry bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precip tator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026		0																	Coal		Dry bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precip tator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	5	0																	Coal		Dry bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precip tator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	6	0																	Coal		Dry bottom wa l-fired bo ler	Wet Limes one	Low NOx Bu ner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precip tator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	7	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	8	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	9	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	10	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	11	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	12	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	13	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	1	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	15	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	16	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	17	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	18	0																	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	19	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	20	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/28/2026	21	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	22	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 28/2026	23	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limes one	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1 29/2026	0	1	2		3 989	MEASUR	0.162	CALC	2.52	MEASUR	0.103	CALC	2.189	MEASUR	0 089	CALC	2 .6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	1	1	15		30 632	MEASUR	0.171	CALC	18.35	MEASUR	0.103	CALC	16.102	MEASUR	0.09	CALC	178.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	2	1	27		59 88	MEASUR	0.182	CALC	33.71	MEASUR	0.103	CALC	30.229	MEASUR	0 092	CALC	328.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	3	1	29		65 833	MEASUR	0.187	CALC	36.127	MEASUR	0.103	CALC	31.692	MEASUR	0.09	CALC	352.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026		1	29		35 998	MEASUR	0.105	CALC	35.26	MEASUR	0.103	CALC	50.866	MEASUR	0.1 8	CALC	3 3.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	5	1	31		7 201	MEASUR	0.017	CALC	.166	MEASUR	0.103	CALC	1 8.961	MEASUR	0 3 6	CALC	30.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	6	1	9		9.122	MEASUR	0.083	CALC	60.681	MEASUR	0.103	CALC	188.679	MEASUR	0 319	CALC	591.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	7	1	50		176 207	MEASUR	0.292	CALC	61.886	MEASUR	0.103	CALC	5 .289	MEASUR	0.09	CALC	603.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	8	1	50		109 366	MEASUR	0.18	CALC	62.38	MEASUR	0.103	CALC	66.889	MEASUR	0.11	CALC	608.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	9	1	52		1 2 838	MEASUR	0.235	CALC	62.3 7	MEASUR	0.103	CALC	63 81	MEASUR	0.105	CALC	607.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	10	1	52		1 9 821	MEASUR	0.256	CALC	60.155	MEASUR	0.103	CALC	6 . 9	MEASUR	0.11	CALC	586.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	11	1	52		1 8.85	MEASUR	0.2 9	CALC	61.257	MEASUR	0.103	CALC	6 . 86	MEASUR	0.108	CALC	597.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	12	1	52		165.87	MEASUR	0.277	CALC	61.327	MEASUR	0.103	CALC	65.16	MEASUR	0.109	CALC	597.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	13	1	52		155. 76	MEASUR	0.2 9	CALC	6 .007	MEASUR	0.103	CALC	68.626	MEASUR	0.11	CALC	623.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	1	1	52		159 092	MEASUR	0.255	CALC	6 .13	MEASUR	0.103	CALC	69.997	MEASUR	0.112	CALC	625	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	15	1	52		1 2. 91	MEASUR	0.239	CALC	61.163	MEASUR	0.103	CALC	69.1 3	MEASUR	0.116	CALC	596.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	16	1	52		181 092	MEASUR	0.297	CALC	62.663	MEASUR	0.103	CALC	67.171	MEASUR	0.11	CALC	610.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	17	1	52		163 897	MEASUR	0.278	CALC	60.5 2	MEASUR	0.103	CALC	65.505	MEASUR	0.111	CALC	590.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	18	1	52		223 7 3	MEASUR	0.368	CALC	62.3 2	MEASUR	0.103	CALC	67. 8	MEASUR	0.111	CALC	607.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	19	1	52		195 08	MEASUR	0.321	CALC	62. 0	MEASUR	0.103	CALC	67.526	MEASUR	0.111	CALC	608.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	20	1	52		172 382	MEASUR	0.27	CALC	6 .60	MEASUR	0.103	CALC	69 27	MEASUR	0.11	CALC	629.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	21	1	52		180 8 9	MEASUR	0.289	CALC	6 .179	MEASUR	0.103	CALC	69. 27	MEASUR	0.111	CALC	625.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	22	1	52		186 963	MEASUR	0.287	CALC	66.931	MEASUR	0.103	CALC	73.072	MEASUR	0.112	CALC	652.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/29/2026	23	1	52		181.1 3	MEASUR	0.269	CALC	69.117	MEASUR	0.103	CALC	76.12	MEASUR	0.113	CALC	673.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	0	1	52		188 759	MEASUR	0.287	CALC	67.581	MEASUR	0.103	CALC	73.779	MEASUR	0.112	CALC	658.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	1	1	52		178 236	MEASUR	0.288	CALC	63.563	MEASUR	0.103	CALC	69.383	MEASUR	0.112	CALC	619.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	2	1	52		178 307	MEASUR	0.28	CALC	65.219	MEASUR	0.103	CALC	71.199	MEASUR	0.112	CALC	635.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	3	1	52		169 768	MEASUR	0.269	CALC	6 .77	MEASUR	0.103	CALC	70.706	MEASUR	0.112	CALC	631.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026		1	52		177 531	MEASUR	0.278	CALC	65. 76	MEASUR	0.103	CALC	72.103	MEASUR	0.113	CALC	638.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	5	1	52		198 539	MEASUR	0.292	CALC	69.678	MEASUR	0.103	CALC	7 .038	MEASUR	0.109	CALC	679.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	6	1	52		126 682	MEASUR	0.187	CALC	69.337	MEASUR	0.103	CALC	72.315	MEASUR	0.107	CALC	675.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	7	1	52		56. 96	MEASUR	0.089	CALC	6 .87	MEASUR	0.103	CALC	67.006	MEASUR	0.106	CALC	632.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	8	1	52		52. 9	MEASUR	0.083	CALC	6 .753	MEASUR	0.103	CALC	70.689	MEASUR	0.112	CALC	631.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	9	1	52		65.158	MEASUR	0.107	CALC	62.303	MEASUR	0.103	CALC	67. 07	MEASUR	0.111	CALC	607.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	10	1	52		6 .6	MEASUR	0.112	CALC	59.002	MEASUR	0.103	CALC	6 98	MEASUR	0.113	CALC	575.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	11	1	52		56.23	MEASUR	0.095	CALC	60.889	MEASUR	0.103	CALC	6 .67	MEASUR	0.109	CALC	593.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	12	1	52		5 .166	MEASUR	0.087	CALC	63.631	MEASUR	0.103	CALC	69. 5	MEASUR	0.112	CALC	620.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	13	1	52		57 908	MEASUR	0.09	CALC	63.239	MEASUR	0.103	CALC	68. 07	MEASUR	0.111	CALC	616.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	1	1	52		55 738	MEASUR	0.088	CALC	6 .6 2	MEASUR	0.103	CALC	72. 5	MEASUR	0.115	CALC	630	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	15	1	52		66 576	MEASUR	0.105	CALC	6 .96	MEASUR	0.103	CALC	70.279	MEASUR	0.111	CALC	633.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	16	1	52		57 583	MEASUR	0.095	CALC	62.357	MEASUR	0.103	CALC	68.66	MEASUR	0.113	CALC	607.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	17	1	53		63 697	MEASUR	0.101	CALC	6 .87	MEASUR	0.103	CALC	71. 55	MEASUR	0.113	CALC	632.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	18	1	55		71 7 6	MEASUR	0.109	CALC	67.369	MEASUR	0.103	CALC	78.138	MEASUR	0.119	CALC	656.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	19	1	55		71 865	MEASUR	0.11	CALC	66.9 3	MEASUR	0.103	CALC	78.951	MEASUR	0.121	CALC	652.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	20	1	52		70 985	MEASUR	0.111	CALC	65.621	MEASUR	0.103	CALC	75. 68	MEASUR	0.118	CALC	639.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	21	1	50		6 299	MEASUR	0.109	CALC	60.687	MEASUR	0.103	CALC	65.062	MEASUR	0.11	CALC	591.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	22	1	50		68. 9	MEASUR	0.11	CALC	6 .085	MEASUR	0.103	CALC	66.20	MEASUR	0.106	CALC	62 .6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/30/2026	23	1	50		73 267	MEASUR	0.11	CALC	65.8 2	MEASUR	0.103	CALC	68.022	MEASUR	0.106	CALC	6 1.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	0	1	50		63 53	MEASUR	0.098	CALC	66.201	MEASUR	0.103	CALC	68.396	MEASUR	0.106	CALC	6 5.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	1	1	50		62 9 5	MEASUR	0.107	CALC	60.582	MEASUR	0.103	CALC	63.189	MEASUR	0.107	CALC	590.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	2	1	50		59 8 2	MEASUR	0.099	CALC	62.127	MEASUR	0.103	CALC	65.993	MEASUR	0.109	CALC	605.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	3	1	50		65 821	MEASUR	0.111	CALC	60.697	MEASUR	0.103	CALC	62.713	MEASUR	0.106	CALC	591.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026		1	50		60.79	MEASUR	0.099	CALC	63.206	MEASUR	0.103	CALC	65.928	MEASUR	0.107	CALC	616.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	5	1	50		62 353	MEASUR	0.108	CALC	59.356	MEASUR	0.103	CALC	62. 75	MEASUR	0.108	CALC	578.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	6	1	50		67 978	MEASUR	0.12	CALC	58.085	MEASUR	0.103	CALC	60.578	MEASUR	0.107	CALC	566.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	7	1	50		81 819	MEASUR	0.137	CALC	61.269	MEASUR	0.103	CALC	6 . 95	MEASUR	0.108	CALC	597.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	8	1	50		67. 6	MEASUR	0.111	CALC	62.1	MEASUR	0.103	CALC	6 .205	MEASUR	0.106	CALC	605.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	9	1	50		69 7 2	MEASUR	0.12	CALC	59.589	MEASUR	0.103	CALC	62.1 3	MEASUR	0.107	CALC	580.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	10	1	50		7 023	MEASUR	0.13	CALC	56.836	MEASUR	0.103	CALC	59.833	MEASUR	0.108	CALC	55	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	11	1	50		73 2	MEASUR	0.12	CALC	60.736	MEASUR	0.103	CALC	63.932	MEASUR	0.108	CALC	591.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	12	1	50		67.156	MEASUR	0.116	CALC	59.19	MEASUR	0.103	CALC	62.309	MEASUR	0.108	CALC	576.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	13	1	50		75 0 9	MEASUR	0.126	CALC	60.968	MEASUR	0.103	CALC	62.993	MEASUR	0.106	CALC	59 .3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	1	1	50		80.155	MEASUR	0.131	CALC	62.739	MEASUR	0.103	CALC	65. 3	MEASUR	0.107	CALC	611.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	15	1	50		65 628	MEASUR	0.113	CALC	59.601	MEASUR	0.103	CALC	62.162	MEASUR	0.107	CALC	580.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	16	1	50		66.02	MEASUR	0.115	CALC	58.895	MEASUR	0.103	CALC	61. 18	MEASUR	0.107	CALC	57	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	17	1	50		69 386	MEASUR	0.121	CALC	58.726	MEASUR	0.103	CALC	61.2 1	MEASUR	0.107	CALC	572.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	18	1	50		65 305	MEASUR	0.118	CALC	56.987	MEASUR	0.103	CALC	59. 3	MEASUR	0.107	CALC	555.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	19	1	50		67 296	MEASUR	0.116	CALC	59.598	MEASUR	0.103	CALC	62.7 2	MEASUR	0.108	CALC	580.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	20	1	50		70.136	MEASUR	0.115	CALC	62.56	MEASUR	0.103	CALC	65.857	MEASUR	0.108	CALC	609.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	21	1	50		69 709	MEASUR	0.117	CALC	60.998	MEASUR	0.103	CALC	63.605	MEASUR	0.107	CALC	59 .5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	22	1	50		69.172	MEASUR	0.116	CALC	61. 05	MEASUR	0.103	CALC	6 .631	MEASUR	0.108	CALC	598.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	2	CS023, MS2	1/31/2026	23	1	50		65 907	MEASUR	0.117	CALC	57.67	MEASUR	0.103	CALC	59.587	MEASUR	0.106	CALC	562.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS

State	Facil ty Name	Facility D	Unit ID	Associated Stacks	Da e	Hour	Operatin g me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass lbs)	SO2 Mass Measur e Indicato r	SO2 Rate (lbs/mm Btu)	SO2 Rate Measur e Indicato r	CO2 Mass (short tons)	CO2 Mass Measur e Indicato r	CO2 Rate (short tons/m mB u)	CO2 Rate Measur e nd cato r	NOx Mass (bs)	NOx Mass Measur e Indicato r	NOx Rate (lbs/mm Btu)	NOx Rate Measur e ndicato r	Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	0	1	265		161.5	MEASUR	0.051	CALC	32 .2	MEASUR	0.103	CALC	2 6.5	MEASUR	0 078	CALC	3159.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	1	1	265		287.3	MEASUR	0.093	CALC	317.9	MEASUR	0.103	CALC	2 1.7	MEASUR	0 078	CALC	3098.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	2	1	26		27 .9	MEASUR	0.087	CALC	32 .7	MEASUR	0.103	CALC	253.2	MEASUR	0.08	CALC	3165.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	3	1	265		2 3.3	MEASUR	0.077	CALC	325.1	MEASUR	0.103	CALC	2 7.1	MEASUR	0 078	CALC	3168.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026		1	265		3 6.2	MEASUR	0.109	CALC	32 .5	MEASUR	0.103	CALC	272	MEASUR	0 086	CALC	3162.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	5	1	26		257.2	MEASUR	0.081	CALC	326.6	MEASUR	0.103	CALC	219.7	MEASUR	0 069	CALC	3183.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	6	1	271		307.	MEASUR	0.095	CALC	332.2	MEASUR	0.103	CALC	262.3	MEASUR	0 081	CALC	3238.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	7	1	279		367.	MEASUR	0.113	CALC	333.3	MEASUR	0.103	CALC	259.9	MEASUR	0.08	CALC	32 8.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	8	1	279		311.2	MEASUR	0.09	CALC	338.3	MEASUR	0.103	CALC	250.6	MEASUR	0 076	CALC	3297.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	9	1	275		378.3	MEASUR	0.11	CALC	3 0.	MEASUR	0.103	CALC	258.8	MEASUR	0 078	CALC	3317.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	10	1	280		3 9.	MEASUR	0.106	CALC	339.6	MEASUR	0.103	CALC	00.5	MEASUR	0.121	CALC	3310	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	11	1	263		210.1	MEASUR	0.068	CALC	319.3	MEASUR	0.103	CALC	110 .9	MEASUR	0 355	CALC	3112.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	12	1	26		306.9	MEASUR	0.1	CALC	315	MEASUR	0.103	CALC	1157.3	MEASUR	0 377	CALC	3069.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	13	1	231		167	MEASUR	0.063	CALC	273.2	MEASUR	0.103	CALC	977.3	MEASUR	0 367	CALC	2663	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	1	1	180		57.6	MEASUR	0.026	CALC	227.	MEASUR	0.103	CALC	782.	MEASUR	0 353	CALC	2216.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	15	1	185		6 .2	MEASUR	0.029	CALC	230.3	MEASUR	0.103	CALC	792.	MEASUR	0 353	CALC	22 .8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	16	1	231		180.1	MEASUR	0.065	CALC	282.	MEASUR	0.103	CALC	0.	MEASUR	0.16	CALC	2752.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	17	1	281		322.	MEASUR	0.096	CALC	3 3.5	MEASUR	0.103	CALC	23 .	MEASUR	0.07	CALC	33 8.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	18	1	283		330.6	MEASUR	0.099	CALC	3 1.2	MEASUR	0.103	CALC	266.1	MEASUR	0.08	CALC	3325.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	19	1	283		371.3	MEASUR	0.11	CALC	332.7	MEASUR	0.103	CALC	252.9	MEASUR	0 078	CALC	32 2.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	20	1	283		358.3	MEASUR	0.108	CALC	339.3	MEASUR	0.103	CALC	257.9	MEASUR	0 078	CALC	3306.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	21	1	281		362.7	MEASUR	0.109	CALC	339.9	MEASUR	0.103	CALC	258.	MEASUR	0 078	CALC	3312.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	22	1	283		35 .8	MEASUR	0.106	CALC	3 3	MEASUR	0.103	CALC	260.8	MEASUR	0 078	CALC	33 3.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/20/2026	23	1	282		353	MEASUR	0.108	CALC	335.	MEASUR	0.103	CALC	255	MEASUR	0 078	CALC	3269.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	0	1	282		277.8	MEASUR	0.113	CALC	252.2	MEASUR	0.103	CALC	191.7	MEASUR	0 078	CALC	2 58	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	1	1	282		355.	MEASUR	0.11	CALC	330.8	MEASUR	0.103	CALC	251.5	MEASUR	0 078	CALC	322 .5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	2	1	279		353.6	MEASUR	0.108	CALC	335.1	MEASUR	0.103	CALC	25 .8	MEASUR	0 078	CALC	3266.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	3	1	280		359.	MEASUR	0.109	CALC	337.7	MEASUR	0.103	CALC	253.	MEASUR	0 077	CALC	3291.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026		1	27		338	MEASUR	0.106	CALC	327.2	MEASUR	0.103	CALC	2 8.7	MEASUR	0 078	CALC	3188.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	5	1	278		397.8	MEASUR	0.121	CALC	337.5	MEASUR	0.103	CALC	250	MEASUR	0 076	CALC	3289.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	6	1	271		293.2	MEASUR	0.10	CALC	288.8	MEASUR	0.103	CALC	213.9	MEASUR	0 076	CALC	2815.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	7	1	270		3 3.1	MEASUR	0.111	CALC	317	MEASUR	0.103	CALC	237.9	MEASUR	0 077	CALC	3089.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	8	1	280		373.8	MEASUR	0.113	CALC	338.2	MEASUR	0.103	CALC	250.5	MEASUR	0 076	CALC	3296.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	9	1	282		35.6	MEASUR	0.131	CALC	3 0.3	MEASUR	0.103	CALC	252	MEASUR	0 076	CALC	3316.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	10	1	282		398.8	MEASUR	0.12	CALC	339.9	MEASUR	0.103	CALC	2 8.5	MEASUR	0 075	CALC	3313	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	11	1	282		06.3	MEASUR	0.123	CALC	3 0	MEASUR	0.103	CALC	2 8.6	MEASUR	0 075	CALC	331 .1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	12	1	281		375.2	MEASUR	0.117	CALC	329	MEASUR	0.103	CALC	2 3.7	MEASUR	0 076	CALC	3206.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	13	1	282		39	MEASUR	0.122	CALC	332.1	MEASUR	0.103	CALC	236.3	MEASUR	0 073	CALC	3236.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	1	1	281		383.3	MEASUR	0.117	CALC	336.1	MEASUR	0.103	CALC	252.2	MEASUR	0 077	CALC	3275.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	15	1	279		357.3	MEASUR	0.109	CALC	335.5	MEASUR	0.103	CALC	225.6	MEASUR	0 069	CALC	3270.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	16	1	277		302.8	MEASUR	0.09	CALC	329.9	MEASUR	0.103	CALC	2 .3	MEASUR	0 076	CALC	321 .9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	17	1	282		286.7	MEASUR	0.087	CALC	336.7	MEASUR	0.103	CALC	239.5	MEASUR	0 073	CALC	3281.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	18	1	280		322	MEASUR	0.099	CALC	333.6	MEASUR	0.103	CALC	2 3.9	MEASUR	0 075	CALC	3251.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	19	1	282		15.2	MEASUR	0.128	CALC	332.9	MEASUR	0.103	CALC	2 3.3	MEASUR	0 075	CALC	32 .	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	20	1	282		280.8	MEASUR	0.085	CALC	338.6	MEASUR	0.103	CALC	2 7.5	MEASUR	0 075	CALC	3300.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	21	1	280		0 .1	MEASUR	0.123	CALC	337.3	MEASUR	0.103	CALC	2 3.3	MEASUR	0 07	CALC	3287.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	22	1	278		353.8	MEASUR	0.109	CALC	333.9	MEASUR	0.103	CALC	2 0.8	MEASUR	0 07	CALC	325 .7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/21/2026	23	1	268		30	MEASUR	0.096	CALC	323.5	MEASUR	0.103	CALC	236.5	MEASUR	0 075	CALC	3153.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	0	1	265		332.2	MEASUR	0.105	CALC	323.8	MEASUR	0.103	CALC	230.	MEASUR	0 073	CALC	3155.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	1	1	268		301.8	MEASUR	0.097	CALC	319.6	MEASUR	0.103	CALC	233.6	MEASUR	0 075	CALC	311 .7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	2	1	272		336.	MEASUR	0.103	CALC	333.6	MEASUR	0.103	CALC	2 3.9	MEASUR	0 075	CALC	3251.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	3	1	280		00.7	MEASUR	0.122	CALC	338.3	MEASUR	0.103	CALC	2 7.3	MEASUR	0 075	CALC	3297.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026		1	280		366.3	MEASUR	0.112	CALC	336.9	MEASUR	0.103	CALC	2 9.6	MEASUR	0 076	CALC	3283.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	5	1	278		36 .6	MEASUR	0.111	CALC	336	MEASUR	0.103	CALC	235.8	MEASUR	0 072	CALC	327 .6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	6	1	270		265.5	MEASUR	0.08	CALC	325.6	MEASUR	0.103	CALC	2 .	MEASUR	0 077	CALC	3173.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	7	1	273		368.5	MEASUR	0.118	CALC	320.9	MEASUR	0.103	CALC	237.7	MEASUR	0 076	CALC	3128.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	8	1	271		320.5	MEASUR	0.101	CALC	32 .2	MEASUR	0.103	CALC	2 0.2	MEASUR	0 076	CALC	3160.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	9	1	273		383.7	MEASUR	0.119	CALC	330.2	MEASUR	0.103	CALC	2 1.	MEASUR	0 075	CALC	3218.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	10	1	258		263.5	MEASUR	0.088	CALC	308.5	MEASUR	0.103	CALC	225.5	MEASUR	0 075	CALC	3007.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	11	1	235		202	MEASUR	0.073	CALC	285	MEASUR	0.103	CALC	19 .	MEASUR	0.07	CALC	2777.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	12	1	216		1 8	MEASUR	0.058	CALC	260.9	MEASUR	0.103	CALC	180.5	MEASUR	0 071	CALC	25 2.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	13	1	223		169.8	MEASUR	0.066	CALC	26 .1	MEASUR	0.103	CALC	169.9	MEASUR	0 066	CALC	2573.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	1	1	235		197.6	MEASUR	0.071	CALC	285.3	MEASUR	0.103	CALC	203	MEASUR	0 073	CALC	2780.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	15	1	269		329.7	MEASUR	0.10	CALC	325.2	MEASUR	0.103	CALC	2 0.9	MEASUR	0 076	CALC	3170	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	16	1	28		379.6	MEASUR	0.113	CALC	3 3.7	MEASUR	0.103	CALC	257.9	MEASUR	0 077	CALC	33 9.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	17	1	283		15.8	MEASUR	0.125	CALC	339.9	MEASUR	0.103	CALC	251.8	MEASUR	0 076	CALC	3313.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	18	1	28		9.5	MEASUR	0.135	CALC	3 1.9	MEASUR	0.103	CALC	253.2	MEASUR	0 076	CALC	3332.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	19	1	28		390.2	MEASUR	0.12	CALC	333.3	MEASUR	0.103	CALC	2 6.9	MEASUR	0 076	CALC	32 8.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	20	1	28		18.	MEASUR	0.126	CALC	3 1.3	MEASUR	0.103	CALC	252.8	MEASUR	0 076	CALC	3326.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	21	1	282		37.2	MEASUR	0.133	CALC	338.3	MEASUR	0.103	CALC	2	MEASUR	0 07	CALC	3297.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	22	1	280		399.9	MEASUR	0.122	CALC	336.8	MEASUR	0.103	CALC	2 9.5	MEASUR	0 076	CALC	3283.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/22/2026	23	1	28		371	MEASUR	0.112	CALC	3 1.2	MEASUR	0.103	CALC	252.7	MEASUR	0 076	CALC	3325.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	0	1	277		386	MEASUR	0.119	CALC	333	MEASUR	0.103	CALC	2 0.1	MEASUR	0 07	CALC	32 5.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	1	1	28		508	MEASUR	0.155	CALC	335.8	MEASUR	0.103	CALC	255.3	MEASUR	0 078	CALC	3272.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	2	1	285		20.	MEASUR	0.125	CALC	3 5.8	MEASUR	0.103	CALC	256.2	MEASUR	0 076	CALC	3370.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	3	1	281		07.8	MEASUR	0.123	CALC	339.9	MEASUR	0.103	CALC	251.8	MEASUR	0 076	CALC	3312.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026		1	277		397.2	MEASUR	0.122	CALC	333.9	MEASUR	0.103	CALC	257.1	MEASUR	0 079	CALC	325 .6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	5	1	283		71.3	MEASUR	0.1 1	CALC	3 3.7	MEASUR	0.103	CALC	2 7.9	MEASUR	0 07	CALC	3350.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	6	1	279		13.6	MEASUR	0.126	CALC	336.3	MEASUR	0.103	CALC	2 5.9	MEASUR	0 075	CALC	3278	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	7	1	275		387.9	MEASUR	0.122	CALC	326.3	MEASUR	0.103	CALC	2 .9	MEASUR	0 077	CALC	3180	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	8	1	271		351.2	MEASUR	0.109	CALC	330.3	MEASUR	0.103	CALC	2 7.9	MEASUR	0 077	CALC	3218.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	9	1	267		3 5.1	MEASUR	0.109	CALC	326.2	MEASUR	0.103	CALC	238.	MEASUR	0 075	CALC	3178.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	10	1	269		396.1	MEASUR	0.123	CALC	330.3	MEASUR	0.103	CALC	25 .3	MEASUR	0 079	CALC	3219.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	11	1	27		390.	MEASUR	0.12	CALC	335.1	MEASUR	0.103	CALC	25 .7	MEASUR	0 078	CALC	3266	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	12	1	26		359.1	MEASUR	0.11	CALC	322.1	MEASUR	0.103	CALC	25 .3	MEASUR	0 081	CALC	3139.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	13	1	27		51.	MEASUR	0.138	CALC	335.1	MEASUR	0.103	CALC	307	MEASUR	0 09	CALC	3266.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	1	1	273		385.6	MEASUR	0.118	CALC	336.	MEASUR	0.103	CALC	285.2	MEASUR	0 087	CALC	3278.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	15	1	275		61.5	MEASUR	0.139	CALC	3 0.6	MEASUR	0.103	CALC	315.	MEASUR	0 095	CALC	3319.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	16	1	275		80. 9	MEASUR	0.1 3	CALC	3 3.5 8	MEASUR	0.103	CALC	321. 29	MEASUR	0 096	CALC	33 8.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	17	1	275		67 303	MEASUR	0.1 1	CALC	3 0.803	MEASUR	0.103	CALC	318.901	MEASUR	0 096	CALC	3321.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	18	1	275		587 05	MEASUR	0.173	CALC	3 7.776	MEASUR	0.103	CALC	355.911	MEASUR	0.105	CALC	3389.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	19	1	275		582 323	MEASUR	0.176	CALC	339.138	MEASUR	0.103	CALC	393.377	MEASUR	0.119	CALC	3305.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	20	1	286		68 28	MEASUR	0.198	CALC	355.08	MEASUR	0.103	CALC	0 .901	MEASUR	0.117	CALC	3 60.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	21	1	286		72 .1 8	MEASUR	0.207	CALC	359.62	MEASUR	0.103	CALC	20.629	MEASUR	0.12	CALC	350 .9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	22	1	286		70 . 3	MEASUR	0.191	CALC	377.558	MEASUR	0.103	CALC	1.612	MEASUR	0.12	CALC	3680.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/23/2026	23	1	286		660 67	MEASUR	0.192	CALC	353.098	MEASUR	0.103	CALC	06.152	MEASUR	0.118	CALC	3 1.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	0	1	286		691 908	MEASUR	0.198	CALC	358.773	MEASUR	0.103	CALC	16.058	MEASUR	0.119	CALC	3 96.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	1	1	286		693. 26	MEASUR	0.203	CALC	350.563	MEASUR	0.103	CALC	09.963	MEASUR	0.12	CALC	3 16.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	2	1	285		65 901	MEASUR	0.193	CALC	3 8.001	MEASUR	0.103	CALC	13.795	MEASUR	0.122	CALC	3391.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	3	1	286		633 693	MEASUR	0.191	CALC	3 1.17	MEASUR	0.103	CALC	05.736	MEASUR	0.122	CALC	3325.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026		1	286		653 998	MEASUR	0.196	CALC	3 3.03	MEASUR	0.103	CALC	07 85	MEASUR	0.122	CALC	33 3.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	5	1	286		71 .06	MEASUR	0.202	CALC	362. 03	MEASUR	0.103	CALC	3 . 1	MEASUR	0.123	CALC	3531.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	6	1	286		63 28	MEASUR	0.188	CALC	3 6.081	MEASUR	0.103	CALC	11.57	MEASUR	0.122	CALC	3373.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	7	1	286		666.6	MEASUR	0.201	CALC	339.815	MEASUR	0.103	CALC	07. 23	MEASUR	0.123	CALC	3312.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	8	1	283		669. 9	MEASUR	0.20	CALC	337. 91	MEASUR	0.103	CALC	01.356	MEASUR	0.122	CALC	3289.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	9	1	285		6 0 369	MEASUR	0.196	CALC	33 .392	MEASUR	0.103	CALC	397.651	MEASUR	0.122	CALC	3259.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	10	1	283		613 902	MEASUR	0.196	CALC	321.017	MEASUR	0.103	CALC	378.631	MEASUR	0.121	CALC	3128.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	11	1	283		667. 53	MEASUR	0.2	CALC	3 2.639	MEASUR	0.103	CALC	07. 33	MEASUR	0.122	CALC	3339.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	12	1	28		666 209	MEASUR	0.201	CALC	3 0.12	MEASUR	0.103	CALC	07.738	MEASUR	0.123	CALC	331 .9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	13	1	28		659 53	MEASUR	0.196	CALC	3 5.615	MEASUR	0.103	CALC	10.951	MEASUR	0.122	CALC	3368.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	1	1	28		6 1. 7	MEASUR	0.19	CALC	339.108	MEASUR	0.103	CALC	03.261	MEASUR	0.122	CALC	3305.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	15	1	28		638 233	MEASUR	0.195	CALC	335.725	MEASUR	0.103	CALC	395.906	MEASUR	0.121	CALC	3271.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	16	1	28		637 308	MEASUR	0.206	CALC	316.96	MEASUR	0.103	CALC	379.93	MEASUR	0.123	CALC	3089	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	17	1	286		630 811	MEASUR	0.193	CALC	335. 17	MEASUR	0.103	CALC	398.879	MEASUR	0.122	CALC	3269.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	18	1	286		5 1.28	MEASUR	0.163	CALC	3 1.166	MEASUR	0.103	CALC	05.6 2	MEASUR	0.122	CALC	3325.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	19	1	286		628 018	MEASUR	0.187	CALC	3 .132	MEASUR	0.103	CALC	09.202	MEASUR	0.122	CALC	335	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	20	1	286		721.102	MEASUR	0.211	CALC	3 9.889	MEASUR	0.103	CALC	16.059	MEASUR	0.122	CALC	3 10.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	21	1	286		613 292	MEASUR	0.193	CALC	326.615	MEASUR	0.103	CALC	385.169	MEASUR	0.121	CALC	3183.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	22	1	286		563.122	MEASUR	0.173	CALC	333.896	MEASUR	0.103	CALC	397 02	MEASUR	0.122	CALC	325 .6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/2 /2026	23	1	286		653.152	MEASUR	0.197	CALC	3 0.326	MEASUR	0.103	CALC	398.03	MEASUR	0.12	CALC	3316.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	0	1	286		709.155	MEASUR	0.215	CALC	338.12	MEASUR	0.103	CALC	398.70	MEASUR	0.121	CALC	3295.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	1	1	286		671 005	MEASUR	0.201	CALC	3 2.86	MEASUR	0.103	CALC	0 .295	MEASUR	0.121	CALC	33 1.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	2	1	286		636. 78	MEASUR	0.187	CALC	3 9.12	MEASUR	0.103	CALC	15.12	MEASUR	0.122	CALC	3 02.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	3	1	286		628 615	MEASUR	0.19	CALC	339.1 2	MEASUR	0.103	CALC	399.897	MEASUR	0.121	CALC	3305.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026		1	286		660 837	MEASUR	0.2	CALC	339.557	MEASUR	0.103	CALC	00. 79	MEASUR	0.121	CALC	3309.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	5	1	286		680.	MEASUR	0.207	CALC	337. 5	MEASUR	0.103	CALC	1 .366	MEASUR	0.126	CALC	3288.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	6	1	286		682 258	MEASUR	0.201	CALC	3 7.602	MEASUR	0.103	CALC	13.26	MEASUR	0.122	CALC	3387.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	7	1	286		662.197	MEASUR	0.196	CALC	3 7.26	MEASUR	0.103	CALC	09.537	MEASUR	0.121	CALC	338 .6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	8	1	286		6 609	MEASUR	0.19	CALC	3 7.77	MEASUR	0.103	CALC	10.136	MEASUR	0.121	CALC	3389.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	9	1	286		238 865	MEASUR	0.136	CALC	180.1 3	MEASUR	0.103	CALC	280.83	MEASUR	0.16	CALC	1755.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	10	0																	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	11	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	12	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	13	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	1	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	15	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	16	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	17	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	18	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	19	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	20	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	21	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	22	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/25/2026	23	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		Dry bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS

State	Facil ty Name	Facility D	Unit ID	Associated Stacks	Da e	Hour	Operatin g me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass lbs)	SO2 Mass Measure Indicator	SO2 Rate (lbs/mm Btu)	SO2 Rate Measure Indicator	CO2 Mass (short tons)	CO2 Mass Measure Indicator	CO2 Rate (short tons/mm Bu)	CO2 Rate Measure nd cator	NOx Mass (bs)	NOx Mass Measure Indicator	NOx Rate (lbs/mm Btu)	NOx Rate Measure ndicator	Heat nput mmBtu)	Heat Input Measure Indicator	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	0	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	1	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	2	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	3	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026		1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	5	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	6	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	7	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	8	1	0		0	MEASURE			0	MEASURE			0	MEASURE			0	CALC	Coal		D y bottom wa l- ired boiler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	9	1	5		0	MEASUR	0	CALC	10.992	MEASUR	0.103	CALC	3 .05	MEASUR	0 318	CALC	107.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	10	1	23		0	MEASUR	0	CALC	2.07	MEASUR	0.103	CALC	126.272	MEASUR	0 308	CALC	10	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	11	1	71		8 9	MEASUR	0.005	CALC	105.51	MEASUR	0.103	CALC	319.77	MEASUR	0 311	CALC	1028.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	12	1	125		2 859	MEASUR	0.015	CALC	173.027	MEASUR	0.103	CALC	507.569	MEASUR	0 301	CALC	1686.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	13	1	168		181 366	MEASUR	0.08	CALC	222.603	MEASUR	0.103	CALC	325. 67	MEASUR	0.15	CALC	2169.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	1	1	207		271 021	MEASUR	0.105	CALC	263.988	MEASUR	0.103	CALC	311.302	MEASUR	0.121	CALC	2572.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	15	1	251		5 8.39	MEASUR	0.176	CALC	319.922	MEASUR	0.103	CALC	386.689	MEASUR	0.12	CALC	3118.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	16	1	283		635 273	MEASUR	0.192	CALC	338.756	MEASUR	0.103	CALC	386.317	MEASUR	0.117	CALC	3301.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	17	1	268		561 878	MEASUR	0.172	CALC	335.502	MEASUR	0.103	CALC	392. 52	MEASUR	0.12	CALC	3270.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	18	1	263		678 293	MEASUR	0.191	CALC	365.029	MEASUR	0.103	CALC	23.391	MEASUR	0.119	CALC	3557.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	19	1	266		582. 36	MEASUR	0.177	CALC	337.601	MEASUR	0.103	CALC	39 .815	MEASUR	0.12	CALC	3290.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	20	1	266		57 .92	MEASUR	0.176	CALC	33 .8 7	MEASUR	0.103	CALC	391.6 5	MEASUR	0.12	CALC	3263.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	21	1	266		511 955	MEASUR	0.156	CALC	335.9 8	MEASUR	0.103	CALC	615. 83	MEASUR	0.188	CALC	327	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	22	1	266		301.2	MEASUR	0.099	CALC	311.7	MEASUR	0.103	CALC	200.5	MEASUR	0 066	CALC	3037.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/26/2026	23	1	265		253.5	MEASUR	0.115	CALC	225.8	MEASUR	0.103	CALC	178.3	MEASUR	0 081	CALC	2200.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	0	1	26		228.	MEASUR	0.097	CALC	2 2.3	MEASUR	0.103	CALC	186.6	MEASUR	0 079	CALC	2362.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	1	1	265		300.7	MEASUR	0.107	CALC	289	MEASUR	0.103	CALC	222.5	MEASUR	0 079	CALC	2816.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	2	1	265		351.3	MEASUR	0.11	CALC	327.6	MEASUR	0.103	CALC	252.2	MEASUR	0 079	CALC	3193	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	3	1	266		319.7	MEASUR	0.1	CALC	329.3	MEASUR	0.103	CALC	253.6	MEASUR	0 079	CALC	3209.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026		1	266		355.6	MEASUR	0.111	CALC	329.7	MEASUR	0.103	CALC	253.9	MEASUR	0 079	CALC	3213.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	5	1	266		365	MEASUR	0.112	CALC	33 .2	MEASUR	0.103	CALC	25 .1	MEASUR	0 078	CALC	3257.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	6	1	266		3 8.6	MEASUR	0.109	CALC	328.3	MEASUR	0.103	CALC	2 9.6	MEASUR	0 078	CALC	3200.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	7	1	26		32	MEASUR	0.10	CALC	318.7	MEASUR	0.103	CALC	2 2.3	MEASUR	0 078	CALC	3105.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	8	1	258		300.3	MEASUR	0.097	CALC	317.5	MEASUR	0.103	CALC	253.7	MEASUR	0 082	CALC	309 .2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	9	1	26		339.1	MEASUR	0.107	CALC	32 .2	MEASUR	0.103	CALC	233.9	MEASUR	0 07	CALC	3160.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	10	1	232		200.9	MEASUR	0.072	CALC	285.8	MEASUR	0.103	CALC	220	MEASUR	0 079	CALC	2785.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	11	1	210		151.3	MEASUR	0.059	CALC	265	MEASUR	0.103	CALC	196.3	MEASUR	0 076	CALC	2582.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	12	1	210		16 .1	MEASUR	0.063	CALC	266	MEASUR	0.103	CALC	19 .5	MEASUR	0 075	CALC	2593	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	13	1	263		331	MEASUR	0.106	CALC	320.5	MEASUR	0.103	CALC	228	MEASUR	0 073	CALC	3123.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	1	1	26		2 8	MEASUR	0.078	CALC	32 .2	MEASUR	0.103	CALC	2 9.6	MEASUR	0 079	CALC	3159.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	15	1	270		568.	MEASUR	0.175	CALC	333.5	MEASUR	0.103	CALC	2 7	MEASUR	0 076	CALC	3250.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	16	1	280		7.5	MEASUR	0.13	CALC	3 3.6	MEASUR	0.103	CALC	261.2	MEASUR	0 078	CALC	33 9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	17	1	280		5 .	MEASUR	0.135	CALC	3 6	MEASUR	0.103	CALC	259.7	MEASUR	0 077	CALC	3372.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	18	1	280		65.1	MEASUR	0.138	CALC	3 5.	MEASUR	0.103	CALC	2 5.7	MEASUR	0 073	CALC	3366.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	19	1	280		399.2	MEASUR	0.121	CALC	337.3	MEASUR	0.103	CALC	2 9.9	MEASUR	0 076	CALC	3287.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	20	1	220		292.6	MEASUR	0.111	CALC	271.3	MEASUR	0.103	CALC	206.2	MEASUR	0 078	CALC	26 .1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	21	1	105		2.5	MEASUR	0.002	CALC	1 6.1	MEASUR	0.103	CALC	5 3.9	MEASUR	0 382	CALC	1 23.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	22	1	103		.1	MEASUR	0.003	CALC	1 .6	MEASUR	0.103	CALC	608.8	MEASUR	0. 32	CALC	1 09.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/27/2026	23	1	138		12.8	MEASUR	0.007	CALC	185.	MEASUR	0.103	CALC	702.8	MEASUR	0 389	CALC	1806.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	0	1	216		116.7	MEASUR	0.0 5	CALC	268	MEASUR	0.103	CALC	731.	MEASUR	0.28	CALC	2612.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	1	1	279		325.1	MEASUR	0.1	CALC	335.2	MEASUR	0.103	CALC	365.9	MEASUR	0.112	CALC	3266.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	2	1	280		366.8	MEASUR	0.11	CALC	3 2.	MEASUR	0.103	CALC	233.6	MEASUR	0.07	CALC	3337	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	3	1	279		30.	MEASUR	0.129	CALC	3 1.3	MEASUR	0.103	CALC	232.8	MEASUR	0.07	CALC	3326.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026		1	279		03.1	MEASUR	0.121	CALC	3 2.9	MEASUR	0.103	CALC	230.6	MEASUR	0 069	CALC	33 2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	5	1	279		38.1	MEASUR	0.129	CALC	3 7.9	MEASUR	0.103	CALC	2 7.5	MEASUR	0 073	CALC	3390.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	6	1	279		35.1	MEASUR	0.13	CALC	3 .5	MEASUR	0.103	CALC	235	MEASUR	0.07	CALC	3357.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	7	1	279		375.6	MEASUR	0.115	CALC	333.9	MEASUR	0.103	CALC	231	MEASUR	0 071	CALC	325 .1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	8	1	27		3 3.2	MEASUR	0.10	CALC	337.6	MEASUR	0.103	CALC	227.1	MEASUR	0 069	CALC	3290.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	9	1	281		391.1	MEASUR	0.116	CALC	3 5.2	MEASUR	0.103	CALC	2 5.6	MEASUR	0 073	CALC	336 .	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	10	1	275		06.9	MEASUR	0.123	CALC	3 0.8	MEASUR	0.103	CALC	235.8	MEASUR	0 071	CALC	3321.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	11	1	278		5 .3	MEASUR	0.162	CALC	3 3.8	MEASUR	0.103	CALC	2 1.3	MEASUR	0 072	CALC	3351	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	12	1	270		26	MEASUR	0.131	CALC	332.9	MEASUR	0.103	CALC	230.	MEASUR	0 071	CALC	32 .	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	13	1	26		17.7	MEASUR	0.13	CALC	319.7	MEASUR	0.103	CALC	22 .3	MEASUR	0 072	CALC	3115.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	1	1	2 8		29 .2	MEASUR	0.099	CALC	306	MEASUR	0.103	CALC	217.7	MEASUR	0 073	CALC	2982.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	15	1	272		59.8	MEASUR	0.1	CALC	336.3	MEASUR	0.103	CALC	239.3	MEASUR	0 073	CALC	3277.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	16	1	278		63.1	MEASUR	0.139	CALC	3 1.9	MEASUR	0.103	CALC	239.9	MEASUR	0 072	CALC	3331.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	17	1	279		92.5	MEASUR	0.1 7	CALC	3 3.9	MEASUR	0.103	CALC	2 1.3	MEASUR	0 072	CALC	3351.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	18	1	279		508.7	MEASUR	0.152	CALC	3 3.7	MEASUR	0.103	CALC	237.8	MEASUR	0 071	CALC	33 9.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	19	1	279		5	MEASUR	0.16	CALC	3 0.8	MEASUR	0.103	CALC	239.2	MEASUR	0 072	CALC	3321.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	20	1	280		5 6	MEASUR	0.161	CALC	3 6.9	MEASUR	0.103	CALC	2 3.	MEASUR	0 072	CALC	3381	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	21	1	279		96.9	MEASUR	0.1 6	CALC	3 9.3	MEASUR	0.103	CALC	251.9	MEASUR	0 07	CALC	3 0 .5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	22	1	279		93.5	MEASUR	0.1 5	CALC	3 9.9	MEASUR	0.103	CALC	255.8	MEASUR	0 075	CALC	3 10.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/28/2026	23	1	279		5 5.	MEASUR	0.16	CALC	350.2	MEASUR	0.103	CALC	290.1	MEASUR	0 085	CALC	3 13.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	0	1	279		555 911	MEASUR	0.162	CALC	351.776	MEASUR	0.103	CALC	305.111	MEASUR	0 089	CALC	3 28.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	1	1	278		567 868	MEASUR	0.171	CALC	3 0.2 6	MEASUR	0.103	CALC	298. 98	MEASUR	0.09	CALC	3316.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	2	1	279		618 816	MEASUR	0.182	CALC	3 8.386	MEASUR	0.103	CALC	312.371	MEASUR	0 092	CALC	3395.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	3	1	279		633 367	MEASUR	0.187	CALC	3 7.573	MEASUR	0.103	CALC	30 .908	MEASUR	0.09	CALC	3387.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026		1	191		237.102	MEASUR	0.105	CALC	232.2	MEASUR	0.103	CALC	335.03	MEASUR	0.1 8	CALC	2263.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	5	1	127		29. 99	MEASUR	0.017	CALC	180.93	MEASUR	0.103	CALC	610.239	MEASUR	0 3 6	CALC	1763.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	6	1	185		185. 78	MEASUR	0.083	CALC	229.119	MEASUR	0.103	CALC	712. 21	MEASUR	0 319	CALC	2233.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	7	1	260		916 293	MEASUR	0.292	CALC	321.81	MEASUR	0.103	CALC	282.311	MEASUR	0.09	CALC	3136.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	8	1	273		597.13	MEASUR	0.18	CALC	3 0.616	MEASUR	0.103	CALC	365.211	MEASUR	0.11	CALC	3320.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	9	1	275		755. 62	MEASUR	0.235	CALC	329.753	MEASUR	0.103	CALC	337. 9	MEASUR	0.105	CALC	321 .1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	10	1	27		789 379	MEASUR	0.256	CALC	316.9 5	MEASUR	0.103	CALC	339.806	MEASUR	0.11	CALC	3089.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	11	1	275		787.15	MEASUR	0.2 9	CALC	323.9 3	MEASUR	0.103	CALC	3 1.01	MEASUR	0.108	CALC	3157.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	12	1	279		890.03	MEASUR	0.277	CALC	329.073	MEASUR	0.103	CALC	3 9 6	MEASUR	0.109	CALC	3207.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	13	1	279		83 .12	MEASUR	0.2 9	CALC	3 3.393	MEASUR	0.103	CALC	368.17	MEASUR	0.11	CALC	33 7.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	1	1	275		8 1. 08	MEASUR	0.255	CALC	339.17	MEASUR	0.103	CALC	370.203	MEASUR	0.112	CALC	3305.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	15	1	251		687 809	MEASUR	0.239	CALC	295.237	MEASUR	0.103	CALC	333.757	MEASUR	0.116	CALC	2877.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	16	1	279		971 708	MEASUR	0.297	CALC	336.237	MEASUR	0.103	CALC	360. 29	MEASUR	0.11	CALC	3276.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	17	1	278		876 203	MEASUR	0.278	CALC	323.658	MEASUR	0.103	CALC	350.195	MEASUR	0.111	CALC	315 .7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	18	1	279		1200 357	MEASUR	0.368	CALC	33 . 58	MEASUR	0.103	CALC	361.852	MEASUR	0.111	CALC	3259.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	19	1	279		10 6 616	MEASUR	0.321	CALC	33 .796	MEASUR	0.103	CALC	362.27	MEASUR	0.111	CALC	3263.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	20	1	279		92 818	MEASUR	0.27	CALC	3 6.596	MEASUR	0.103	CALC	371 63	MEASUR	0.11	CALC	3378.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	21	1	279		970 251	MEASUR	0.289	CALC	3 .321	MEASUR	0.103	CALC	372. 73	MEASUR	0.111	CALC	3355.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	22	1	27		985.137	MEASUR	0.287	CALC	352.669	MEASUR	0.103	CALC	385.028	MEASUR	0.112	CALC	3 37.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/29/2026	23	1	273		951 057	MEASUR	0.269	CALC	362.883	MEASUR	0.103	CALC	399.676	MEASUR	0.113	CALC	3536.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	0	1	276		1001 9 1	MEASUR	0.287	CALC	358.719	MEASUR	0.103	CALC	391.621	MEASUR	0.112	CALC	3 96.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	1	1	275		9 2 56	MEASUR	0.288	CALC	336.137	MEASUR	0.103	CALC	366.917	MEASUR	0.112	CALC	3276.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	2	1	275		9 2 893	MEASUR	0.28	CALC	3 .881	MEASUR	0.103	CALC	376.501	MEASUR	0.112	CALC	3361.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	3	1	275		897 732	MEASUR	0.269	CALC	3 2.526	MEASUR	0.103	CALC	373.89	MEASUR	0.112	CALC	3338.3	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026		1	276		9 2 269	MEASUR	0.278	CALC	3 7.52	MEASUR	0.103	CALC	382.697	MEASUR	0.113	CALC	3386.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	5	1	276		1053 761	MEASUR	0.292	CALC	369.822	MEASUR	0.103	CALC	392.962	MEASUR	0.109	CALC	360 .9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	6	1	278		677 218	MEASUR	0.187	CALC	370.663	MEASUR	0.103	CALC	386.585	MEASUR	0.107	CALC	3612.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	7	1	279		303.10	MEASUR	0.089	CALC	3 8.03	MEASUR	0.103	CALC	359. 9	MEASUR	0.106	CALC	3391.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	8	1	273		275 351	MEASUR	0.083	CALC	339.9 7	MEASUR	0.103	CALC	371.111	MEASUR	0.112	CALC	3313.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	9	1	27		3 3 3 2	MEASUR	0.107	CALC	328.297	MEASUR	0.103	CALC	355.193	MEASUR	0.111	CALC	3200.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	10	1	269		33 .36	MEASUR	0.112	CALC	305.198	MEASUR	0.103	CALC	336.12	MEASUR	0.113	CALC	297 .8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	11	1	275		297.37	MEASUR	0.095	CALC	322.011	MEASUR	0.103	CALC	3 2.026	MEASUR	0.109	CALC	3138.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	12	1	265		276 03	MEASUR	0.087	CALC	32 .269	MEASUR	0.103	CALC	353.9 6	MEASUR	0.112	CALC	3160.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	13	1	265		295 092	MEASUR	0.09	CALC	322.261	MEASUR	0.103	CALC	3 8.593	MEASUR	0.111	CALC	31 0.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	1	1	2 7		26 762	MEASUR	0.088	CALC	307.058	MEASUR	0.103	CALC	3 .15	MEASUR	0.115	CALC	2992.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	15	1	26		338 02	MEASUR	0.105	CALC	329.836	MEASUR	0.103	CALC	356.821	MEASUR	0.111	CALC	321 .9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	16	1	277		306 717	MEASUR	0.095	CALC	332.1 3	MEASUR	0.103	CALC	365.736	MEASUR	0.113	CALC	3236.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	17	1	277		332 903	MEASUR	0.101	CALC	339.03	MEASUR	0.103	CALC	373. 5	MEASUR	0.113	CALC	330 .6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	18	1	278		362 65	MEASUR	0.109	CALC	3 0.531	MEASUR	0.103	CALC	39 .962	MEASUR	0.119	CALC	3318.9	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	19	1	278		363 235	MEASUR	0.11	CALC	338.357	MEASUR	0.103	CALC	399.0 9	MEASUR	0.121	CALC	3298	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	20	1	278		372 315	MEASUR	0.111	CALC	3 .179	MEASUR	0.103	CALC	395.832	MEASUR	0.118	CALC	335 .7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	21	1	278		357 501	MEASUR	0.109	CALC	337. 13	MEASUR	0.103	CALC	361.738	MEASUR	0.11	CALC	3288.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	22	1	278		380.81	MEASUR	0.11	CALC	356.315	MEASUR	0.103	CALC	368.096	MEASUR	0.106	CALC	3 72.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/30/2026	23	1	278		07 333	MEASUR	0.11	CALC	366.058	MEASUR	0.103	CALC	378.178	MEASUR	0.106	CALC	3567.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	0	1	278		353 266	MEASUR	0.098	CALC	368.099	MEASUR	0.103	CALC	380.30	MEASUR	0.106	CALC	3587.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	1	1	278		3 9 955	MEASUR	0.107	CALC	336.818	MEASUR	0.103	CALC	351.311	MEASUR	0.107	CALC	3283	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	2	1	263		31 758	MEASUR	0.099	CALC	326.773	MEASUR	0.103	CALC	3 7.107	MEASUR	0.109	CALC	318 .8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	3	1	275		361 979	MEASUR	0.111	CALC	333.803	MEASUR	0.103	CALC	3 .887	MEASUR	0.106	CALC	3253.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026		1	277		336.81	MEASUR	0.099	CALC	350.19	MEASUR	0.103	CALC	365.272	MEASUR	0.107	CALC	3 13.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	5	1	277		3 5. 7	MEASUR	0.108	CALC	328.8	MEASUR	0.103	CALC	3 6.125	MEASUR	0.108	CALC	3205	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	6	1	277		376 622	MEASUR	0.12	CALC	321.815	MEASUR	0.103	CALC	335.622	MEASUR	0.107	CALC	3136.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	7	1	277		53 281	MEASUR	0.137	CALC	339. 31	MEASUR	0.103	CALC	357.305	MEASUR	0.108	CALC	3308.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	8	1	277		373 65	MEASUR	0.111	CALC	3 .26	MEASUR	0.103	CALC	355.695	MEASUR	0.106	CALC	3355.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	9	1	277		386 358	MEASUR	0.12	CALC	330.111	MEASUR	0.103	CALC	3 .257	MEASUR	0.107	CALC	3217.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	10	1	277		10 077	MEASUR	0.13	CALC	31 .86	MEASUR	0.103	CALC	331. 67	MEASUR	0.108	CALC	3069.1	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	11	1	277		05 756	MEASUR	0.12	CALC	336. 6	MEASUR	0.103	CALC	35 .168	MEASUR	0.108	CALC	3279	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	12	1	277		372 0	MEASUR	0.116	CALC	327.91	MEASUR	0.103	CALC	3 5.191	MEASUR	0.108	CALC	3196	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	13	1	276		1 251	MEASUR	0.126	CALC	336.532	MEASUR	0.103	CALC	3 7.707	MEASUR	0.106	CALC	3280.	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	1	1	277		0 5	MEASUR	0.131	CALC	3 7.561	MEASUR	0.103	CALC	362. 7	MEASUR	0.107	CALC	3387.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	15	1	276		362 272	MEASUR	0.113	CALC	328.999	MEASUR	0.103	CALC	3 3.138	MEASUR	0.107	CALC	3206.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	16	1	277		365.78	MEASUR	0.115	CALC	326.305	MEASUR	0.103	CALC	3 0.282	MEASUR	0.107	CALC	3180.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	17	1	276		383 01	MEASUR	0.121	CALC	32 .17	MEASUR	0.103	CALC	338.059	MEASUR	0.107	CALC	3159.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	18	1	277		361 795	MEASUR	0.118	CALC	315.713	MEASUR	0.103	CALC	329.266	MEASUR	0.107	CALC	3077.5	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	19	1	276		371 50	MEASUR	0.116	CALC	329.002	MEASUR	0.103	CALC	3 6.358	MEASUR	0.108	CALC	3206.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	20	1	276		387.16	MEASUR	0.115	CALC	3 5.3	MEASUR	0.103	CALC	363.5 3	MEASUR	0.108	CALC	3366.2	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	21	1	276		38 791	MEASUR	0.117	CALC	336.702	MEASUR	0.103	CALC	351.095	MEASUR	0.107	CALC	3281.6	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	22	1	277		383 228	MEASUR	0.116	CALC	3 0.195	MEASUR	0.103	CALC	358.069	MEASUR	0.108	CALC	3315.8	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	F B Cu ley Generating Station	1012	3	CS023	1/31/2026	23	1	276		363 793	MEASUR	0.117	CALC	318.33	MEASUR	0.103	CALC	328.913	MEASUR	0.106	CALC	3102.7	CALC	Coal		D y bottom wa l- ired bo ler	Wet Limestone	Low NOx Burner Techno ogy (Dry Bottom only)|Se ective Catalytic Reduction	Baghouse	Sodium Bas	ARP, CSNOX, CSOSG2E, CSSO2G1, MATS

State	Facil ty Name	Facility ID	Unit ID	Associated Stacks	Da e	Hour	Operation me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass (lbs)	SO2 Mass Measur e Indicato r	SO2 Rate Measur e (lbs/mm Btu)	SO2 Rate Measur e Indicato r	CO2 Mass Measur e (short tons)	CO2 Mass Measur e Indicato r	CO2 Rate Measur e (short tons/m mB u)	CO2 Rate Measur e Indicato r	CO2 Mass Measur e NOx (bs)	NOx Mass Measur e Indicato r	NOx Rate Measur e (lbs/mm Btu)	NOx Rate Measur e Indicato r	Heat Input Measur e Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	R M Schah er Generating Station	6085	16A		1/20/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026		0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	12	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	13	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	14	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	15	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	16	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	17	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	18	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	19	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	20	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	21	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	22	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/20/2026	23	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	4	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/21/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 21/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	0	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	2	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	3	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	4	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	12	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	13	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	15	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	16	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	17	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/22/2026	18	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 22/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	0	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	2	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	3	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	4	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	5	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	6	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	7	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	8	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 23/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	15	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	16	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	17	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	18	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	19	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	20	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	21	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	22	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/23/2026	23	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/2 /2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/2 /2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/2 /2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/2 /2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	4	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	5	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	6	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	7	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	8	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 2 /2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	4	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	12	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/25/2026	13	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 25/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1

State	Facil ty Name	Facility ID	Unit ID	Associated Stacks	Da e	Hour	Operating Time	Gross Load (MW)	Steam Load (1000 lb/hr)	SO2 Mass (lbs)	SO2 Mass Measurement Indicator	SO2 Rate (lbs/mmBtu)	SO2 Rate Measurement Indicator	CO2 Mass (short tons)	CO2 Mass Measurement Indicator	CO2 Rate (short tons/mmBtu)	CO2 Rate Measurement Indicator	NOx Mass (lbs)	NOx Mass Measurement Indicator	NOx Rate (lbs/mmBtu)	NOx Rate Measurement Indicator	Heat Input (mmBtu)	Heat Input Measurement Indicator	Primary Fuel Type	Secondary Fuel Type	Unit Type	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	R M Schah er Generating Station	6085	16A		1/26/2026	0	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	1	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	2	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	3	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026		0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	5	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	6	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	7	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	8	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	9	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	10	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1/26/2026	11	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 26/2026	12	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 26/2026	13	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 26/2026	1	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 26/2026	15	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 26/2026	16	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 26/2026	17	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 26/2026	18	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	19	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	20	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	21	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	22	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/26/2026	23	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026	0	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026	1	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026	2	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026	3	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026		0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026	5	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026	6	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026	7	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/27/2026	8	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	9	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	10	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	11	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	12	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	13	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	1	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	15	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	16	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	17	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	18	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	19	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	20	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	21	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	22	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 27/2026	23	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 28/2026	0	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 28/2026	1	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 28/2026	2	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 28/2026	3	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 28/2026		0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	5	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	6	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	7	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	8	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	9	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	10	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	11	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	12	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	13	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	1	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	15	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	16	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	17	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	18	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	19	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	20	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	21	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	22	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/28/2026	23	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	0	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	1	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	2	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	3	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026		0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	5	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	6	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	7	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	8	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	9	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	10	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 29/2026	11	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 29/2026	12	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 29/2026	13	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	1	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	15	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	16	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	17	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	18	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	19	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	20	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	21	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	22	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/29/2026	23	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	0	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	1	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	2	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	3	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026		0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 30/2026	5	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 30/2026	6	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 30/2026	7	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 30/2026	8	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 30/2026	9	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	10	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	11	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	12	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	13	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/30/2026	1	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	15	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	16	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	17	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	18	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	19	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	20	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	21	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	22	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1 30/2026	23	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	0	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	1	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	2	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	3	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026		0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	5	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	6	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	7	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	8	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	9	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	10	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	11	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	12	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16A		1/31/2026	13	0																	Pipeline Natural Gas		Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	1	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	15	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	16	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	17	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	18	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	19	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	20	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	21	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	22	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schahfer Generating Station	6085	16A		1 31/2026	23	0																	Pipeline Natural Gas		Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1

State	Facil ty Name	Facility D	Unit ID	Associated Stacks	Da e	Hour	Operation me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass lbs)	SO2 Mass Measur e Indicato r	SO2 Rate (lbs/mm Btu)	SO2 Rate Measur e Indicato r	CO2 Mass (short tons)	CO2 Mass Measur e Indicato r	CO2 Rate (short tons/m mB u)	CO2 Rate Measur e nd cato r	NOx Mass (bs)	NOx Mass Measur e Indicato r	NOx Rate Btu)	NOx Rate Measur e ndicato r	Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	R M Schah er Generating Station	6085	16B		1/20/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026		0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 20/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 20/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 20/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 20/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 20/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 20/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 20/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	19	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	20	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	21	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	22	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/20/2026	23	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026		0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/21/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 21/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	0	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	2	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	3	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026		0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	12	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	13	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	15	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	16	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	17	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/22/2026	18	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 22/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	0	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	2	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	3	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026		0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	5	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	6	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	7	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	8	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 23/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	15	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	16	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	17	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	18	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	19	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	20	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	21	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	22	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/23/2026	23	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/2 /2026	0	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/2 /2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/2 /2026	2	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/2 /2026	3	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026		0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	5	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	6	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	7	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	8	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 2 /2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026		0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	12	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/25/2026	13	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 25/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1

State	Facil ty Name	Facility ID	Unit ID	Associated Stacks	Da e	Hour	Operation me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass lbs)	SO2 Mass Measur e Indicato r	SO2 Rate (lbs/mm Btu)	SO2 Rate Measur e Indicato r	CO2 Mass Measur e Indicato r	CO2 Mass (short tons)	CO2 Rate (short tons/m mB u)	CO2 Rate Measur e nd cato r	NOx Mass (bs)	NOx Mass Measur e Indicato r	NOx Rate (lbs/mm Btu)	NOx Rate Measur e ndicato r	Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	R M Schah er Generating Station	6085	16B		1/26/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026		0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 26/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 26/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 26/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 26/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 26/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 26/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 26/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	19	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	20	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	21	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	22	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/26/2026	23	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026		0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/27/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 27/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	0	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	2	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	3	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026		0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	12	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	13	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	15	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	16	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	17	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/28/2026	18	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 28/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	0	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	2	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	3	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026		0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	5	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	6	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	7	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	8	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 29/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	15	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	16	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	17	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	18	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	19	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	20	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	21	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	22	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/29/2026	23	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/30/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/30/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/30/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/30/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026		0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	5	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	6	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	7	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	8	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	9	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	10	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	11	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	12	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	13	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 30/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	0	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	1	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	2	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	3	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026		0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	5	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	6	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	7	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	8	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	9	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	10	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	11	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	12	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1/31/2026	13	0																	Pipeline	Natural Gas	Combustion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	1	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	15	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	16	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	17	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	18	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	19	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	20	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	21	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	22	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1
N	R M Schah er Generating Station	6085	16B		1 31/2026	23	0																	Pipeline	Natural Gas	Combus ion turbine					CSNOX, CSOSG2E, CSSO2G1

State	Facil ty Name	Facility D	Unit ID	Associated Stacks	Da e	Hour	Operatin g me	Gross Load (MW)	Steam Load (1000 b/hr)	SO_2 Mass lbs)	SO_2 Mass Measur e Indicato r	SO_2 Rate (lbs/mm Btu)	SO_2 Rate Measur e Indicato r	CO_2 Mass (short tons)	CO_2 Mass Measur e Indicato r	CO_2 Rate (short tons/m mB u)	CO_2 Rate Measur e nd cato r	NOx Mass (bs)	NOx Mass Measur e Indicato r	NOx Rate (lbs/mm Btu)	NOx Rate Measur e ndicato r	Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO_2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	R M Schah er Generating Station	6085	17		1/20/2026	0	1	372		367.9	MEASUR	0.103	CALC	366	MEASUR	0.103	CALC	720.6	MEASUR	0 202	MEASUR	3567.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	1	1	369		336.2	MEASUR	0.09	CALC	366	MEASUR	0.103	CALC	73 .9	MEASUR	0 206	MEASUR	3567.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	2	1	3 2		319.9	MEASUR	0.097	CALC	337	MEASUR	0.103	CALC	610.9	MEASUR	0.186	MEASUR	328 .6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	3	1	338		312.1	MEASUR	0.096	CALC	333.5	MEASUR	0.103	CALC	588.3	MEASUR	0.181	MEASUR	3250.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026		1	3 1		350.9	MEASUR	0.107	CALC	336.9	MEASUR	0.103	CALC	581.2	MEASUR	0.177	MEASUR	3283.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	5	1	291		23 .6	MEASUR	0.083	CALC	290.6	MEASUR	0.103	CALC	523.9	MEASUR	0.185	MEASUR	2832	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	6	1	177		53.9	MEASUR	0.03	CALC	187.3	MEASUR	0.103	CALC	5 9.5	MEASUR	0 301	MEASUR	1825.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	7	1	173		6.5	MEASUR	0.025	CALC	187.6	MEASUR	0.103	CALC	508.	MEASUR	0 278	MEASUR	1828.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	8	1	172		3.8	MEASUR	0.02	CALC	18 .	MEASUR	0.103	CALC	96.1	MEASUR	0 276	MEASUR	1797.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	9	1	17		62.9	MEASUR	0.03	CALC	190.7	MEASUR	0.103	CALC	96.2	MEASUR	0 267	MEASUR	1858.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	10	1	175		5 .6	MEASUR	0.029	CALC	196.1	MEASUR	0.103	CALC	51 .2	MEASUR	0 269	MEASUR	1911.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	11	1	175		7.7	MEASUR	0.025	CALC	196	MEASUR	0.103	CALC	508.2	MEASUR	0 266	MEASUR	1910.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	12	1	175		6.2	MEASUR	0.025	CALC	190.5	MEASUR	0.103	CALC	80.8	MEASUR	0 259	MEASUR	1856.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	13	1	175		9.3	MEASUR	0.027	CALC	190.3	MEASUR	0.103	CALC	73.1	MEASUR	0 255	MEASUR	1855.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	1	1	17		3.1	MEASUR	0.023	CALC	190.1	MEASUR	0.103	CALC	57.8	MEASUR	0 2 7	MEASUR	1853.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	15	1	183		59.5	MEASUR	0.031	CALC	200	MEASUR	0.103	CALC	19.1	MEASUR	0 215	MEASUR	19 9.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	16	1	2 8		1 3.	MEASUR	0.056	CALC	263.7	MEASUR	0.103	CALC	329	MEASUR	0.128	MEASUR	2570.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	17	1	331		273.2	MEASUR	0.082	CALC	3 2	MEASUR	0.103	CALC	553.3	MEASUR	0.166	MEASUR	3333.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	18	1	370		367.6	MEASUR	0.1	CALC	376.9	MEASUR	0.103	CALC	69 .3	MEASUR	0.189	MEASUR	3673.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	19	1	356		325.7	MEASUR	0.092	CALC	36 .8	MEASUR	0.103	CALC	622.2	MEASUR	0.175	MEASUR	3555.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	20	1	368		35 .8	MEASUR	0.098	CALC	372.1	MEASUR	0.103	CALC	652.8	MEASUR	0.18	MEASUR	3626.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	21	1	3		32	MEASUR	0.095	CALC	350	MEASUR	0.103	CALC	552.6	MEASUR	0.162	MEASUR	3 11	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	22	1	339		306.8	MEASUR	0.091	CALC	3 .7	MEASUR	0.103	CALC	51	MEASUR	0.153	MEASUR	3359.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/20/2026	23	1	3 6		319	MEASUR	0.09	CALC	3 9.7	MEASUR	0.103	CALC	511.3	MEASUR	0.15	MEASUR	3 08.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	0	1	370		329.9	MEASUR	0.09	CALC	37	MEASUR	0.103	CALC	619.7	MEASUR	0.17	MEASUR	36 5.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	1	1	366		27 .	MEASUR	0.076	CALC	371.3	MEASUR	0.103	CALC	622.5	MEASUR	0.172	MEASUR	3619	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	2	1	3 6		235.9	MEASUR	0.069	CALC	3 9	MEASUR	0.103	CALC	55 .5	MEASUR	0.163	MEASUR	3 01.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	3	1	292		136.5	MEASUR	0.0 8	CALC	29 .3	MEASUR	0.103	CALC	.6	MEASUR	0.155	MEASUR	2868.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026		1	2 1		86.1	MEASUR	0.035	CALC	253.2	MEASUR	0.103	CALC	367.6	MEASUR	0.1 9	MEASUR	2 67.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	5	1	26		111.9	MEASUR	0.0 1	CALC	279.	MEASUR	0.103	CALC	359.5	MEASUR	0.132	MEASUR	2723.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	6	1	325		17 .3	MEASUR	0.05	CALC	330.	MEASUR	0.103	CALC	515.3	MEASUR	0.16	MEASUR	3220.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	7	1	365		232	MEASUR	0.06	CALC	372.	MEASUR	0.103	CALC	613.5	MEASUR	0.169	MEASUR	3629.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	8	1	369		221.7	MEASUR	0.06	CALC	377.1	MEASUR	0.103	CALC	635.8	MEASUR	0.173	MEASUR	3675.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	9	1	373		23 .5	MEASUR	0.063	CALC	383.2	MEASUR	0.103	CALC	6 9.9	MEASUR	0.17	MEASUR	373 .8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	10	1	370		205.2	MEASUR	0.056	CALC	37 .8	MEASUR	0.103	CALC	6 2.9	MEASUR	0.176	MEASUR	3653	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	11	1	36		186.7	MEASUR	0.051	CALC	372.1	MEASUR	0.103	CALC	605.7	MEASUR	0.167	MEASUR	3627.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	12	1	362		188.1	MEASUR	0.052	CALC	370.6	MEASUR	0.103	CALC	577.9	MEASUR	0.16	MEASUR	3611.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	13	1	370		183	MEASUR	0.05	CALC	376.9	MEASUR	0.103	CALC	657.6	MEASUR	0.179	MEASUR	3673.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	1	1	370		177.9	MEASUR	0.0 8	CALC	377	MEASUR	0.103	CALC	665	MEASUR	0.181	MEASUR	367 .2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	15	1	372		187.	MEASUR	0.051	CALC	376.2	MEASUR	0.103	CALC	696.7	MEASUR	0.19	MEASUR	3666.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	16	1	371		18 .3	MEASUR	0.05	CALC	376.3	MEASUR	0.103	CALC	70 .1	MEASUR	0.192	MEASUR	3667.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	17	1	3 0		155.	MEASUR	0.0 7	CALC	3 0.8	MEASUR	0.103	CALC	571.	MEASUR	0.172	MEASUR	3322	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	18	1	320		123.2	MEASUR	0.039	CALC	325	MEASUR	0.103	CALC	513.2	MEASUR	0.162	MEASUR	3167.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	19	1	3		176	MEASUR	0.052	CALC	3	MEASUR	0.103	CALC	533.1	MEASUR	0.159	MEASUR	3352.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	20	1	361		215	MEASUR	0.061	CALC	36	MEASUR	0.103	CALC	599.6	MEASUR	0.169	MEASUR	35 8.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	21	1	36		225.5	MEASUR	0.063	CALC	366.7	MEASUR	0.103	CALC	636.1	MEASUR	0.178	MEASUR	3573.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	22	1	368		253.8	MEASUR	0.07	CALC	371.	MEASUR	0.103	CALC	666.1	MEASUR	0.18	MEASUR	3620.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/21/2026	23	1	366		267.7	MEASUR	0.075	CALC	366.9	MEASUR	0.103	CALC	661.6	MEASUR	0.185	MEASUR	3576.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	0	1	335		223.	MEASUR	0.068	CALC	336	MEASUR	0.103	CALC	527.2	MEASUR	0.161	MEASUR	327 .8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	1	1	32		172.3	MEASUR	0.05	CALC	328.3	MEASUR	0.103	CALC	515.2	MEASUR	0.161	MEASUR	3200.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	2	1	305		159.	MEASUR	0.053	CALC	306	MEASUR	0.103	CALC	80.1	MEASUR	0.161	MEASUR	2982.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	3	1	288		128.8	MEASUR	0.0 5	CALC	292.1	MEASUR	0.103	CALC	9.8	MEASUR	0.158	MEASUR	28 7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026		1	338		190.3	MEASUR	0.058	CALC	339.5	MEASUR	0.103	CALC	509.6	MEASUR	0.15	MEASUR	3308.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	5	1	367		233.9	MEASUR	0.065	CALC	370.5	MEASUR	0.103	CALC	603	MEASUR	0.167	MEASUR	3610.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	6	1	3 8		19 .2	MEASUR	0.057	CALC	3 6.7	MEASUR	0.103	CALC	560.9	MEASUR	0.166	MEASUR	3378.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	7	1	320		159.6	MEASUR	0.05	CALC	326.	MEASUR	0.103	CALC	96.3	MEASUR	0.156	MEASUR	3181.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	8	1	27		99	MEASUR	0.037	CALC	277.9	MEASUR	0.103	CALC	6.9	MEASUR	0.165	MEASUR	2708.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	9	1	250		75.7	MEASUR	0.03	CALC	262.	MEASUR	0.103	CALC	337.6	MEASUR	0.132	MEASUR	2557.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	10	1	2 0		73.8	MEASUR	0.029	CALC	258.5	MEASUR	0.103	CALC	317.5	MEASUR	0.126	MEASUR	2519.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	11	1	201		53.9	MEASUR	0.02	CALC	233.3	MEASUR	0.103	CALC	302.	MEASUR	0.133	MEASUR	2273.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	12	1	231		51.5	MEASUR	0.021	CALC	2 9.3	MEASUR	0.103	CALC	320.7	MEASUR	0.132	MEASUR	2 29.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	13	1	258		61.3	MEASUR	0.023	CALC	268.6	MEASUR	0.103	CALC	3 2.9	MEASUR	0.131	MEASUR	2617.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	1	1	25		53.9	MEASUR	0.021	CALC	268.3	MEASUR	0.103	CALC	33 .8	MEASUR	0.128	MEASUR	2615.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	15	1	297		79.8	MEASUR	0.027	CALC	306.5	MEASUR	0.103	CALC	33.2	MEASUR	0.1 5	MEASUR	2987.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	16	1	326		109.	MEASUR	0.03	CALC	328.6	MEASUR	0.103	CALC	512.5	MEASUR	0.16	MEASUR	3202.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	17	1	361		151.2	MEASUR	0.0	CALC	356.	MEASUR	0.103	CALC	576.6	MEASUR	0.166	MEASUR	3 73.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	18	1	370		156.3	MEASUR	0.0	CALC	363.6	MEASUR	0.103	CALC	613.2	MEASUR	0.173	MEASUR	35 .3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	19	1	371		15 .	MEASUR	0.0	CALC	363.7	MEASUR	0.103	CALC	595.6	MEASUR	0.168	MEASUR	35 5.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	20	1	371		1 9.	MEASUR	0.0 2	CALC	361.5	MEASUR	0.103	CALC	588.5	MEASUR	0.167	MEASUR	3523.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	21	1	365		138.6	MEASUR	0.0	CALC	356.9	MEASUR	0.103	CALC	567	MEASUR	0.163	MEASUR	3 78.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	22	1	352		122.1	MEASUR	0.036	CALC	3 9.	MEASUR	0.103	CALC	52 .	MEASUR	0.15	MEASUR	3 05.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/22/2026	23	1	350		111.8	MEASUR	0.03	CALC	3 1.2	MEASUR	0.103	CALC	518.8	MEASUR	0.156	MEASUR	3325.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	0	1	3 7		110.1	MEASUR	0.033	CALC	338.8	MEASUR	0.103	CALC	515.2	MEASUR	0.156	MEASUR	3302.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	1	1	33		109.5	MEASUR	0.03	CALC	331.	MEASUR	0.103	CALC	503.8	MEASUR	0.156	MEASUR	3229.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	2	1	329		111.5	MEASUR	0.036	CALC	320.5	MEASUR	0.103	CALC	90.5	MEASUR	0.157	MEASUR	312 .1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	3	1	278		70.8	MEASUR	0.026	CALC	276.	MEASUR	0.103	CALC	9.9	MEASUR	0.167	MEASUR	269	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026		1	232		3 .7	MEASUR	0.015	CALC	238	MEASUR	0.103	CALC	32 .8	MEASUR	0.1	MEASUR	2320.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	5	1	266		52.3	MEASUR	0.02	CALC	270.7	MEASUR	0.103	CALC	361.5	MEASUR	0.137	MEASUR	2638.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	6	1	333		9 .5	MEASUR	0.029	CALC	33 .2	MEASUR	0.103	CALC	501.7	MEASUR	0.15	MEASUR	3257.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	7	1	373		139.9	MEASUR	0.039	CALC	371.7	MEASUR	0.103	CALC	590.6	MEASUR	0.163	MEASUR	3623.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	8	1	372		135	MEASUR	0.037	CALC	369.5	MEASUR	0.103	CALC	590.6	MEASUR	0.16	MEASUR	3601.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	9	1	361		131.	MEASUR	0.037	CALC	362.3	MEASUR	0.103	CALC	568.5	MEASUR	0.161	MEASUR	3531.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	10	1	360		11 .6	MEASUR	0.032	CALC	362.6	MEASUR	0.103	CALC	565.5	MEASUR	0.16	MEASUR	353 .1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	11	1	361		108.8	MEASUR	0.031	CALC	360	MEASUR	0.103	CALC	557.9	MEASUR	0.159	MEASUR	3508.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	12	1	33		85.8	MEASUR	0.026	CALC	333	MEASUR	0.103	CALC	503	MEASUR	0.155	MEASUR	32 5.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	13	1	350		100.7	MEASUR	0.029	CALC	352.	MEASUR	0.103	CALC	532.3	MEASUR	0.155	MEASUR	3 3 .5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	1	1	3 5		10 .2	MEASUR	0.031	CALC	3 .6	MEASUR	0.103	CALC	517.3	MEASUR	0.15	MEASUR	3359	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	15	1	370		125.2	MEASUR	0.035	CALC	370.9	MEASUR	0.103	CALC	582	MEASUR	0.161	MEASUR	3615.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	16	1	373		1 9.3	MEASUR	0.0 2	CALC	365.3	MEASUR	0.103	CALC	601.7	MEASUR	0.169	MEASUR	3560.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	17	1	371		151.5	MEASUR	0.0 3	CALC	363.2	MEASUR	0.103	CALC	587.6	MEASUR	0.166	MEASUR	35 0	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	18	1	373		159.8	MEASUR	0.0 5	CALC	365.8	MEASUR	0.103	CALC	595.3	MEASUR	0.167	MEASUR	356 .9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	19	1	372		165.8	MEASUR	0.0 7	CALC	363.3	MEASUR	0.103	CALC	59 .9	MEASUR	0.168	MEASUR	35 0.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	20	1	372		178.1	MEASUR	0.05	CALC	363.5	MEASUR	0.103	CALC	598.8	MEASUR	0.169	MEASUR	35 3.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	21	1	372		178.1	MEASUR	0.05	CALC	363.	MEASUR	0.103	CALC	595	MEASUR	0.168	MEASUR	35 1.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	22	1	372		189.1	MEASUR	0.05	CALC	361.1	MEASUR	0.103	CALC	591.2	MEASUR	0.168	MEASUR	3519.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/23/2026	23	1	372		190.	MEASUR	0.05	CALC	362.1	MEASUR	0.103	CALC	596.5	MEASUR	0.169	MEASUR	3529.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	0	1	373		203.5	MEASUR	0.057	CALC	363.	MEASUR	0.103	CALC	595	MEASUR	0.168	MEASUR	35 1.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	1	1	372		206.5	MEASUR	0.059	CALC	359.7	MEASUR	0.103	CALC	599.6	MEASUR	0.171	MEASUR	3506.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	2	1	372		212.6	MEASUR	0.06	CALC	363.3	MEASUR	0.103	CALC	602	MEASUR	0.17	MEASUR	35 1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	3	1	372		211.5	MEASUR	0.06	CALC	363.1	MEASUR	0.103	CALC	605.2	MEASUR	0.171	MEASUR	3538.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026		1	373		213.9	MEASUR	0.06	CALC	365.5	MEASUR	0.103	CALC	616.3	MEASUR	0.173	MEASUR	3562.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	5	1	373		230.6	MEASUR	0.065	CALC	36 .2	MEASUR	0.103	CALC	62 .7	MEASUR	0.176	MEASUR	35 9.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	6	1	372		209.8	MEASUR	0.059	CALC	362	MEASUR	0.103	CALC	613.9	MEASUR	0.17	MEASUR	3528.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	7	1	372		201.	MEASUR	0.056	CALC	366.7	MEASUR	0.103	CALC	611.2	MEASUR	0.171	MEASUR	357 .1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	8	1	373		200.3	MEASUR	0.056	CALC	366.5	MEASUR	0.103	CALC	621.6	MEASUR	0.17	MEASUR	3572.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	9	1	372		221.9	MEASUR	0.061	CALC	372.2	MEASUR	0.103	CALC	631.2	MEASUR	0.17	MEASUR	3627.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	10	1	373		202.1	MEASUR	0.056	CALC	373.2	MEASUR	0.103	CALC	603.8	MEASUR	0.166	MEASUR	3637.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	11	1	373		187	MEASUR	0.051	CALC	375.	MEASUR	0.103	CALC	618.	MEASUR	0.169	MEASUR	3659.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	12	1	373		188.1	MEASUR	0.052	CALC	37 .2	MEASUR	0.103	CALC	6 1.8	MEASUR	0.176	MEASUR	36 6.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	13	1	373		180.8	MEASUR	0.05	CALC	370.3	MEASUR	0.103	CALC	6 9.7	MEASUR	0.18	MEASUR	3609.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	1	1	373		175.5	MEASUR	0.0 8	CALC	373.7	MEASUR	0.103	CALC	651.9	MEASUR	0.179	MEASUR	36 1.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	15	1	372		171.	MEASUR	0.0 7	CALC	373.5	MEASUR	0.103	CALC	629.9	MEASUR	0.173	MEASUR	36 0.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	16	1	373		166.2	MEASUR	0.0 7	CALC	36 .2	MEASUR	0.103	CALC	628.3	MEASUR	0.177	MEASUR	35 9.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	17	1	373		160.1	MEASUR	0.0 5	CALC	36 .2	MEASUR	0.103	CALC	635.5	MEASUR	0.179	MEASUR	3550.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	18	1	372		150.8	MEASUR	0.0 2	CALC	366.	MEASUR	0.103	CALC	635.7	MEASUR	0.178	MEASUR	3571.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	19	1	373		1 8.6	MEASUR	0.0 1	CALC	368.5	MEASUR	0.103	CALC	6 3	MEASUR	0.179	MEASUR	3592	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	20	1	372		1 .6	MEASUR	0.0 1	CALC	366.1	MEASUR	0.103	CALC	631.7	MEASUR	0.177	MEASUR	3568.7	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	21	1	372		132.2	MEASUR	0.037	CALC	366.1	MEASUR	0.103	CALC	617.3	MEASUR	0.173	MEASUR	3568.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	22	1	372		125	MEASUR	0.035	CALC	365.9	MEASUR	0.103	CALC	63 .8	MEASUR	0.178	MEASUR	3566.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/2 /2026	23	1	356		97.7	MEASUR	0.029	CALC	3 5.5	MEASUR	0.103	CALC	565.8	MEASUR	0.168	MEASUR	3367.6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	0	1	367		10 .	MEASUR	0.029	CALC	365.	MEASUR	0.103	CALC	623.3	MEASUR	0.175	MEASUR	3561.5	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	1	1	372		108.8	MEASUR	0.03	CALC	366.	MEASUR	0.103	CALC	667.8	MEASUR	0.187	MEASUR	3571	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	2	1	372		113.5	MEASUR	0.032	CALC	361.6	MEASUR	0.103	CALC	655.6	MEASUR	0.186	MEASUR	352 .8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	3	1	372		118.5	MEASUR	0.033	CALC	36 .8	MEASUR	0.103	CALC	6 3.6	MEASUR	0.181	MEASUR	3555.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026		1	372		122.	MEASUR	0.03	CALC	367.2	MEASUR	0.103	CALC	6 .3	MEASUR	0.18	MEASUR	3579.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	5	1	372		120.2	MEASUR	0.03	CALC	366.9	MEASUR	0.103	CALC	6 3.7	MEASUR	0.18	MEASUR	3576.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	6	1	372		119.2	MEASUR	0.033	CALC	367	MEASUR	0.103	CALC	65 .6	MEASUR	0.183	MEASUR	3577.1	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	7	1	372		11 .7	MEASUR	0.032	CALC	369	MEASUR	0.103	CALC	669	MEASUR	0.186	MEASUR	3596.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	8	1	372		117.1	MEASUR	0.032	CALC	373.8	MEASUR	0.103	CALC	670.3	MEASUR	0.18	MEASUR	36 2.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	9	1	373		125.6	MEASUR	0.03	CALC	381.5	MEASUR	0.103	CALC	676.7	MEASUR	0.182	MEASUR	3718.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	10	1	373		113.9	MEASUR	0.031	CALC	373.	MEASUR	0.103	CALC	669.6	MEASUR	0.18	MEASUR	3639	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	11	1	37		111.8	MEASUR	0.031	CALC	373.3	MEASUR	0.103	CALC	662.1	MEASUR	0.182	MEASUR	3638	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	12	1	373		110.	MEASUR	0.03	CALC	375.	MEASUR	0.103	CALC	687.9	MEASUR	0.188	MEASUR	3658.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	13	1	37		110.3	MEASUR	0.03	CALC	375.3	MEASUR	0.103	CALC	695.1	MEASUR	0.19	MEASUR	3658.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	1	1	373		120.6	MEASUR	0.033	CALC	375.2	MEASUR	0.103	CALC	683.9	MEASUR	0.187	MEASUR	3657.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	15	1	37		121.7	MEASUR	0.03	CALC	371.8	MEASUR	0.103	CALC	670.3	MEASUR	0.185	MEASUR	3623.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	16	1	373		122	MEASUR	0.03	CALC	369.6	MEASUR	0.103	CALC	659.2	MEASUR	0.183	MEASUR	3602	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	17	1	373		125.8	MEASUR	0.035	CALC	368.	MEASUR	0.103	CALC	653.5	MEASUR	0.182	MEASUR	3590.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	18	1	373		130.2	MEASUR	0.036	CALC	366.1	MEASUR	0.103	CALC	6 5.8	MEASUR	0.181	MEASUR	3568.2	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	19	1	373		133.3	MEASUR	0.037	CALC	366.3	MEASUR	0.103	CALC	6 9.7	MEASUR	0.182	MEASUR	3569.9	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	20	1	37		13	MEASUR	0.037	CALC	371	MEASUR	0.103	CALC	672.6	MEASUR	0.186	MEASUR	3616.3	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	21	1	373		132.2	MEASUR	0.037	CALC	368.8	MEASUR	0.103	CALC	672.2	MEASUR	0.187	MEASUR	359 .6	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	22	1	37		130.3	MEASUR	0.036	CALC	366.5	MEASUR	0.103	CALC	66 .	MEASUR	0.186	MEASUR	3571.8	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/25/2026	23	1	373		127.3	MEASUR	0.036	CALC	366.6	MEASUR	0.103	CALC	66 .7	MEASUR	0.186	MEASUR	3573.	MEASUR	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS

State	Facil ty Name	Facility D	Unit ID	Associated Stacks	Da e	Hour	Operatin g me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass lbs)	SO2 Mass Measur e Indicato r	SO2 Rate (lbs/mm Btu)	SO2 Rate Measur e Indicato r	CO2 Mass (short tons)	CO2 Mass Measur e Indicato r	CO2 Rate (short tons/m mB u)	CO2 Rate Measur e nd cato r	NOx Mass (bs)	NOx Mass Measur e Indicato r	NOx Rate (lbs/mm Btu)	NOx Rate Measur e ndicato r	Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	R M Schah er Generating Station	6085	17		1/26/2026	0	1	37		136.	MEASUF	0.038	CALC	369.1	MEASUF	0.103	CALC	672.7	MEASUF	0.187	MEASUF	3597.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	1	1	373		137.3	MEASUF	0.038	CALC	371.	MEASUF	0.103	CALC	68 .2	MEASUF	0.189	MEASUF	3620	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	2	1	375		1 2.5	MEASUF	0.0	CALC	367.9	MEASUF	0.103	CALC	68 .8	MEASUF	0.191	MEASUF	3585.6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	3	1	37		133.2	MEASUF	0.037	CALC	368.1	MEASUF	0.103	CALC	688.8	MEASUF	0.192	MEASUF	3587.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026		1	37		129.3	MEASUF	0.036	CALC	365.9	MEASUF	0.103	CALC	68 .7	MEASUF	0.192	MEASUF	3566.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	5	1	37		133.3	MEASUF	0.037	CALC	368.2	MEASUF	0.103	CALC	67 .7	MEASUF	0.188	MEASUF	3589	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	6	1	37		136.7	MEASUF	0.038	CALC	366.2	MEASUF	0.103	CALC	671	MEASUF	0.188	MEASUF	3568.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	7	1	373		1 1.9	MEASUF	0.039	CALC	369.8	MEASUF	0.103	CALC	666.8	MEASUF	0.185	MEASUF	360 .1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	8	1	37		1 0.9	MEASUF	0.039	CALC	370.8	MEASUF	0.103	CALC	668.5	MEASUF	0.185	MEASUF	3613.6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	9	1	373		155.2	MEASUF	0.0 2	CALC	376.6	MEASUF	0.103	CALC	679	MEASUF	0.185	MEASUF	3670.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	10	1	373		135.8	MEASUF	0.037	CALC	37 .	MEASUF	0.103	CALC	660.5	MEASUF	0.181	MEASUF	36 9.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	11	1	373		130.6	MEASUF	0.036	CALC	370.9	MEASUF	0.103	CALC	65 .3	MEASUF	0.181	MEASUF	361 .7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	12	1	368		126.9	MEASUF	0.036	CALC	366	MEASUF	0.103	CALC	627.9	MEASUF	0.176	MEASUF	3567.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	13	1	353		108.5	MEASUF	0.032	CALC	3 9.1	MEASUF	0.103	CALC	551.3	MEASUF	0.162	MEASUF	3 02.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	1	1	3 9		90.7	MEASUF	0.027	CALC	3 .2	MEASUF	0.103	CALC	526.7	MEASUF	0.157	MEASUF	335 .6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	15	1	363		113.5	MEASUF	0.032	CALC	362.5	MEASUF	0.103	CALC	586.	MEASUF	0.166	MEASUF	3532.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	16	1	373		137.2	MEASUF	0.039	CALC	365.5	MEASUF	0.103	CALC	6 8.	MEASUF	0.182	MEASUF	3562.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	17	1	373		151.	MEASUF	0.0 3	CALC	361.7	MEASUF	0.103	CALC	631	MEASUF	0.179	MEASUF	3525.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	18	1	373		185.3	MEASUF	0.052	CALC	36 .2	MEASUF	0.103	CALC	6 6	MEASUF	0.182	MEASUF	35 9.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	19	1	372		230.9	MEASUF	0.065	CALC	363.2	MEASUF	0.103	CALC	612.	MEASUF	0.173	MEASUF	3539.6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	20	1	372		2 7	MEASUF	0.07	CALC	363	MEASUF	0.103	CALC	601.5	MEASUF	0.17	MEASUF	3538.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	21	1	372		283.1	MEASUF	0.08	CALC	36 .9	MEASUF	0.103	CALC	60 .7	MEASUF	0.17	MEASUF	3556.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	22	1	373		332.1	MEASUF	0.093	CALC	36 .9	MEASUF	0.103	CALC	629.6	MEASUF	0.177	MEASUF	3557	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/26/2026	23	1	372		3 2.2	MEASUF	0.096	CALC	367	MEASUF	0.103	CALC	629.6	MEASUF	0.176	MEASUF	3577.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	0	1	372		03.8	MEASUF	0.11	CALC	362.3	MEASUF	0.103	CALC	628.5	MEASUF	0.178	MEASUF	3531.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	1	1	372		17.1	MEASUF	0.118	CALC	36 .2	MEASUF	0.103	CALC	62 .7	MEASUF	0.176	MEASUF	35 9.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	2	1	373		02.3	MEASUF	0.11	CALC	361.9	MEASUF	0.103	CALC	613.7	MEASUF	0.17	MEASUF	3526.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	3	1	372		05.7	MEASUF	0.11	CALC	36	MEASUF	0.103	CALC	606.7	MEASUF	0.171	MEASUF	35 8.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026		1	372		383.6	MEASUF	0.106	CALC	369.8	MEASUF	0.103	CALC	616.3	MEASUF	0.171	MEASUF	360 .1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	5	1	372		355.5	MEASUF	0.1	CALC	363.7	MEASUF	0.103	CALC	613.3	MEASUF	0.173	MEASUF	35 5.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	6	1	372		321.9	MEASUF	0.091	CALC	363.8	MEASUF	0.103	CALC	620.6	MEASUF	0.175	MEASUF	35 6.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	7	1	373		321	MEASUF	0.089	CALC	369.7	MEASUF	0.103	CALC	630.6	MEASUF	0.175	MEASUF	3603.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	8	1	372		291.3	MEASUF	0.08	CALC	373.	MEASUF	0.103	CALC	633.2	MEASUF	0.17	MEASUF	3638.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	9	1	372		273.1	MEASUF	0.073	CALC	385.1	MEASUF	0.103	CALC	671.9	MEASUF	0.179	MEASUF	3753.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	10	1	37		2 3.2	MEASUF	0.06	CALC	392.5	MEASUF	0.103	CALC	680.9	MEASUF	0.178	MEASUF	3825.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	11	1	372		303.	MEASUF	0.08	CALC	388.9	MEASUF	0.103	CALC	678.5	MEASUF	0.179	MEASUF	3790.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	12	1	365		212.8	MEASUF	0.058	CALC	375.8	MEASUF	0.103	CALC	633.7	MEASUF	0.173	MEASUF	3663	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	13	1	3 9		170.1	MEASUF	0.0 8	CALC	361.7	MEASUF	0.103	CALC	5 6.	MEASUF	0.155	MEASUF	3525.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	1	1	350		162.	MEASUF	0.0 6	CALC	361.9	MEASUF	0.103	CALC	539.6	MEASUF	0.153	MEASUF	3526.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	15	1	368		195.8	MEASUF	0.053	CALC	376.2	MEASUF	0.103	CALC	616	MEASUF	0.168	MEASUF	3666.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	16	1	373		220.1	MEASUF	0.06	CALC	37 .3	MEASUF	0.103	CALC	6 2.1	MEASUF	0.176	MEASUF	36 8.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	17	1	373		238.1	MEASUF	0.065	CALC	373.2	MEASUF	0.103	CALC	636.6	MEASUF	0.175	MEASUF	3637.6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	18	1	373		2 1	MEASUF	0.067	CALC	371.3	MEASUF	0.103	CALC	6 0.5	MEASUF	0.177	MEASUF	3618.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	19	1	372		262.1	MEASUF	0.072	CALC	372.6	MEASUF	0.103	CALC	631.9	MEASUF	0.17	MEASUF	3631.6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	20	1	373		276.5	MEASUF	0.077	CALC	369.3	MEASUF	0.103	CALC	633.	MEASUF	0.176	MEASUF	3598.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	21	1	373		280.6	MEASUF	0.077	CALC	372.8	MEASUF	0.103	CALC	639.	MEASUF	0.176	MEASUF	3633.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	22	1	373		32 .	MEASUF	0.09	CALC	371.	MEASUF	0.103	CALC	6 0.6	MEASUF	0.177	MEASUF	3619.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/27/2026	23	1	373		312.3	MEASUF	0.087	CALC	366.8	MEASUF	0.103	CALC	632.7	MEASUF	0.177	MEASUF	357 .8	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	0	1	372		331.6	MEASUF	0.092	CALC	369	MEASUF	0.103	CALC	629.	MEASUF	0.175	MEASUF	3596.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	1	1	373		3 2.8	MEASUF	0.095	CALC	369	MEASUF	0.103	CALC	632.9	MEASUF	0.176	MEASUF	3596.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	2	1	373		325.5	MEASUF	0.09	CALC	369	MEASUF	0.103	CALC	633.1	MEASUF	0.176	MEASUF	3597	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	3	1	373		27.7	MEASUF	0.119	CALC	368.9	MEASUF	0.103	CALC	629.2	MEASUF	0.175	MEASUF	3595.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026		1	372		339.7	MEASUF	0.09	CALC	368.9	MEASUF	0.103	CALC	632.8	MEASUF	0.176	MEASUF	3595.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	5	1	373		360.	MEASUF	0.1	CALC	371.2	MEASUF	0.103	CALC	636.8	MEASUF	0.176	MEASUF	3618.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	6	1	373		350.2	MEASUF	0.097	CALC	369.2	MEASUF	0.103	CALC	622.5	MEASUF	0.173	MEASUF	3598.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	7	1	372		38 .9	MEASUF	0.106	CALC	372.6	MEASUF	0.103	CALC	628.2	MEASUF	0.173	MEASUF	3631.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	8	1	365		383.9	MEASUF	0.106	CALC	371.2	MEASUF	0.103	CALC	615	MEASUF	0.17	MEASUF	3617.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	9	1	362		38.5	MEASUF	0.122	CALC	369.6	MEASUF	0.103	CALC	576.	MEASUF	0.16	MEASUF	3602.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	10	1	367		613.1	MEASUF	0.169	CALC	372.1	MEASUF	0.103	CALC	591.2	MEASUF	0.163	MEASUF	3627.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	11	1	359		570.8	MEASUF	0.163	CALC	360	MEASUF	0.103	CALC	565	MEASUF	0.161	MEASUF	3509.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	12	1	353		09.1	MEASUF	0.119	CALC	353.7	MEASUF	0.103	CALC	5 8.2	MEASUF	0.159	MEASUF	3 7.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	13	1	3 7		365.9	MEASUF	0.108	CALC	3 6.3	MEASUF	0.103	CALC	526.5	MEASUF	0.156	MEASUF	3375.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	1	1	311		225.3	MEASUF	0.073	CALC	31 .9	MEASUF	0.103	CALC	60.3	MEASUF	0.15	MEASUF	3068.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	15	1	32		2 7.7	MEASUF	0.078	CALC	325.2	MEASUF	0.103	CALC	88	MEASUF	0.15	MEASUF	3169.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	16	1	355		297.	MEASUF	0.087	CALC	350.5	MEASUF	0.103	CALC	553.5	MEASUF	0.162	MEASUF	3 16.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	17	1	373		312.5	MEASUF	0.087	CALC	370.6	MEASUF	0.103	CALC	650.1	MEASUF	0.18	MEASUF	3611.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	18	1	372		01.5	MEASUF	0.111	CALC	369.5	MEASUF	0.103	CALC	655.5	MEASUF	0.182	MEASUF	3601.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	19	1	372		50.7	MEASUF	0.125	CALC	371	MEASUF	0.103	CALC	6 3.6	MEASUF	0.178	MEASUF	3615.8	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	20	1	371		5.3	MEASUF	0.12	CALC	367.2	MEASUF	0.103	CALC	6 .3	MEASUF	0.18	MEASUF	3579.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	21	1	372		361	MEASUF	0.101	CALC	365.2	MEASUF	0.103	CALC	6 7.8	MEASUF	0.182	MEASUF	3559.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	22	1	369		523.7	MEASUF	0.1 6	CALC	368.8	MEASUF	0.103	CALC	6 7	MEASUF	0.18	MEASUF	359 .7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/28/2026	23	1	360		508.8	MEASUF	0.1 8	CALC	353.5	MEASUF	0.103	CALC	596	MEASUF	0.173	MEASUF	3 5.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	0	1	3 6		37.	MEASUF	0.13	CALC	3 .	MEASUF	0.103	CALC	530.3	MEASUF	0.158	MEASUF	3356.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	1	1	3 6		386.8	MEASUF	0.116	CALC	3 1.1	MEASUF	0.103	CALC	528.6	MEASUF	0.159	MEASUF	332 .6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	2	1	331		3 6.6	MEASUF	0.11	CALC	322.6	MEASUF	0.103	CALC	96.8	MEASUF	0.158	MEASUF	31 .6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	3	1	327		380.2	MEASUF	0.122	CALC	320.2	MEASUF	0.103	CALC	93.1	MEASUF	0.158	MEASUF	3120.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026		1	327		3 6	MEASUF	0.111	CALC	320.9	MEASUF	0.103	CALC	87.9	MEASUF	0.156	MEASUF	3127.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	5	1	326		389.5	MEASUF	0.125	CALC	320.3	MEASUF	0.103	CALC	96.	MEASUF	0.159	MEASUF	3122.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	6	1	330		388.6	MEASUF	0.122	CALC	328	MEASUF	0.103	CALC	511.6	MEASUF	0.16	MEASUF	3197.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	7	1	367		5 .9	MEASUF	0.128	CALC	36 .5	MEASUF	0.103	CALC	589.7	MEASUF	0.166	MEASUF	3552.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	8	1	372		69	MEASUF	0.13	CALC	369.2	MEASUF	0.103	CALC	618.9	MEASUF	0.172	MEASUF	3598.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	9	1	371		59	MEASUF	0.126	CALC	373.9	MEASUF	0.103	CALC	612.2	MEASUF	0.168	MEASUF	36 .3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	10	1	373		32.1	MEASUF	0.119	CALC	372.7	MEASUF	0.103	CALC	621.2	MEASUF	0.171	MEASUF	3632.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	11	1	373		28	MEASUF	0.118	CALC	372.7	MEASUF	0.103	CALC	621.1	MEASUF	0.171	MEASUF	3632.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	12	1	373		02.1	MEASUF	0.112	CALC	368.9	MEASUF	0.103	CALC	629.3	MEASUF	0.175	MEASUF	3595.8	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	13	1	373		2 .1	MEASUF	0.116	CALC	37 .6	MEASUF	0.103	CALC	635.3	MEASUF	0.17	MEASUF	3651.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	1	1	368		373.9	MEASUF	0.105	CALC	366.3	MEASUF	0.103	CALC	62 .8	MEASUF	0.175	MEASUF	3570.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	15	1	365		527.1	MEASUF	0.1 9	CALC	36 .1	MEASUF	0.103	CALC	610.3	MEASUF	0.172	MEASUF	35 8.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	16	1	373		02.5	MEASUF	0.111	CALC	371.2	MEASUF	0.103	CALC	6 7.6	MEASUF	0.179	MEASUF	3617.8	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	17	1	373		13.	MEASUF	0.115	CALC	368.9	MEASUF	0.103	CALC	636.	MEASUF	0.177	MEASUF	3595.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	18	1	373		88.	MEASUF	0.136	CALC	369.2	MEASUF	0.103	CALC	6 .1	MEASUF	0.179	MEASUF	3598.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	19	1	373		7 .1	MEASUF	0.131	CALC	371.6	MEASUF	0.103	CALC	666.	MEASUF	0.18	MEASUF	3621.6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	20	1	373		58.6	MEASUF	0.128	CALC	368	MEASUF	0.103	CALC	663.6	MEASUF	0.185	MEASUF	3587	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	21	1	372		30.7	MEASUF	0.12	CALC	367.9	MEASUF	0.103	CALC	659.8	MEASUF	0.18	MEASUF	3586	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	22	1	372		39 .2	MEASUF	0.111	CALC	365.7	MEASUF	0.103	CALC	652.2	MEASUF	0.183	MEASUF	356 .1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/29/2026	23	1	373		395.6	MEASUF	0.11	CALC	367.9	MEASUF	0.103	CALC	6 9	MEASUF	0.181	MEASUF	3585.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	0	1	373		398.5	MEASUF	0.112	CALC	365.8	MEASUF	0.103	CALC	6 1.8	MEASUF	0.18	MEASUF	3565.6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	1	1	372		28.7	MEASUF	0.12	CALC	368	MEASUF	0.103	CALC	6 5.7	MEASUF	0.18	MEASUF	3587.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	2	1	373		2	MEASUF	0.118	CALC	369.2	MEASUF	0.103	CALC	6 0.6	MEASUF	0.178	MEASUF	3598.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	3	1	372		11.8	MEASUF	0.11	CALC	369.3	MEASUF	0.103	CALC	6 7.9	MEASUF	0.18	MEASUF	3599.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026		1	372		363.6	MEASUF	0.102	CALC	365.7	MEASUF	0.103	CALC	6 8.8	MEASUF	0.182	MEASUF	356 .6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	5	1	373		382.1	MEASUF	0.106	CALC	369.3	MEASUF	0.103	CALC	6 0.7	MEASUF	0.178	MEASUF	3599.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	6	1	373		13.8	MEASUF	0.116	CALC	365.7	MEASUF	0.103	CALC	63 .5	MEASUF	0.178	MEASUF	356 .6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	7	1	373		09.9	MEASUF	0.11	CALC	369.5	MEASUF	0.103	CALC	633.8	MEASUF	0.176	MEASUF	3601	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	8	1	369		22.	MEASUF	0.119	CALC	363.5	MEASUF	0.103	CALC	619.9	MEASUF	0.175	MEASUF	35 2.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	9	1	358		395.6	MEASUF	0.11	CALC	357.5	MEASUF	0.103	CALC	571.	MEASUF	0.16	MEASUF	3 8 .3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	10	1	357		362.8	MEASUF	0.106	CALC	352.6	MEASUF	0.103	CALC	560.1	MEASUF	0.163	MEASUF	3 36.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	11	1	362		370.7	MEASUF	0.105	CALC	362.2	MEASUF	0.103	CALC	589.5	MEASUF	0.167	MEASUF	3530.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	12	1	357		3 3.	MEASUF	0.099	CALC	35 .7	MEASUF	0.103	CALC	567	MEASUF	0.16	MEASUF	3 57.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	13	1	3 9		322.6	MEASUF	0.095	CALC	3 7.2	MEASUF	0.103	CALC	53 .6	MEASUF	0.158	MEASUF	3383.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	1	1	307		201.2	MEASUF	0.068	CALC	30 .2	MEASUF	0.103	CALC	59.5	MEASUF	0.155	MEASUF	296 .6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	15	1	269		150.3	MEASUF	0.056	CALC	273	MEASUF	0.103	CALC	.3	MEASUF	0.167	MEASUF	2660.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	16	1	3 0		321.	MEASUF	0.097	CALC	339.8	MEASUF	0.103	CALC	516.7	MEASUF	0.156	MEASUF	3312.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	17	1	371		36.5	MEASUF	0.121	CALC	369.5	MEASUF	0.103	CALC	615.8	MEASUF	0.171	MEASUF	3601	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	18	1	371		7.5	MEASUF	0.125	CALC	368.2	MEASUF	0.103	CALC	6 2.	MEASUF	0.179	MEASUF	3589	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	19	1	373		19.	MEASUF	0.116	CALC	370.7	MEASUF	0.103	CALC	6 3.2	MEASUF	0.178	MEASUF	3613.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	20	1	371		09.7	MEASUF	0.11	CALC	368.5	MEASUF	0.103	CALC	635.7	MEASUF	0.177	MEASUF	3591.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	21	1	372		15.8	MEASUF	0.116	CALC	368.	MEASUF	0.103	CALC	635.6	MEASUF	0.177	MEASUF	3591	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	22	1	372		39 .2	MEASUF	0.11	CALC	368.5	MEASUF	0.103	CALC	628.5	MEASUF	0.175	MEASUF	3591.6	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/30/2026	23	1	371		359.2	MEASUF	0.099	CALC	370.7	MEASUF	0.103	CALC	635.9	MEASUF	0.176	MEASUF	3613	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	0	1	371		315.	MEASUF	0.087	CALC	370.5	MEASUF	0.103	CALC	632	MEASUF	0.175	MEASUF	3611.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	1	1	371		297.2	MEASUF	0.083	CALC	366	MEASUF	0.103	CALC	627.8	MEASUF	0.176	MEASUF	3567.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	2	1	371		291.9	MEASUF	0.081	CALC	368.	MEASUF	0.103	CALC	6 2.6	MEASUF	0.179	MEASUF	3590.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	3	1	372		315.5	MEASUF	0.087	CALC	371.7	MEASUF	0.103	CALC	6 8.5	MEASUF	0.179	MEASUF	3623.1	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026		1	373		296.6	MEASUF	0.082	CALC	370.	MEASUF	0.103	CALC	653.	MEASUF	0.181	MEASUF	3609.8	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	5	1	373		291.3	MEASUF	0.081	CALC	370.3	MEASUF	0.103	CALC	6 9.6	MEASUF	0.18	MEASUF	3608.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	6	1	373		280.1	MEASUF	0.077	CALC	37	MEASUF	0.103	CALC	652.5	MEASUF	0.179	MEASUF	36 5.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	7	1	373		275.9	MEASUF	0.076	CALC	37	MEASUF	0.103	CALC	656.1	MEASUF	0.18	MEASUF	36 5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	8	1	372		262.8	MEASUF	0.073	CALC	371.6	MEASUF	0.103	CALC	6 8.2	MEASUF	0.179	MEASUF	3621.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	9	1	373		273.	MEASUF	0.076	CALC	369.2	MEASUF	0.103	CALC	633.	MEASUF	0.176	MEASUF	3598.8	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	10	1	373		261.2	MEASUF	0.073	CALC	369.3	MEASUF	0.103	CALC	633.5	MEASUF	0.176	MEASUF	3599.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	11	1	373		258.5	MEASUF	0.072	CALC	366.9	MEASUF	0.103	CALC	622.3	MEASUF	0.17	MEASUF	3576.2	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	12	1	372		275.	MEASUF	0.077	CALC	369.1	MEASUF	0.103	CALC	633.2	MEASUF	0.176	MEASUF	3597.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	13	1	373		275.	MEASUF	0.077	CALC	369.1	MEASUF	0.103	CALC	633.2	MEASUF	0.176	MEASUF	3597.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	1	1	373		297.7	MEASUF	0.082	CALC	371.3	MEASUF	0.103	CALC	637	MEASUF	0.176	MEASUF	3619.	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	15	1	373		296.6	MEASUF	0.082	CALC	371.3	MEASUF	0.103	CALC	629.7	MEASUF	0.17	MEASUF	3618.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	16	1	373		289.8	MEASUF	0.081	CALC	369.1	MEASUF	0.103	CALC	618.8	MEASUF	0.172	MEASUF	3597.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	17	1	373		288.7	MEASUF	0.08	CALC	369.1	MEASUF	0.103	CALC	60 .	MEASUF	0.168	MEASUF	3597.9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	18	1	372		301.1	MEASUF	0.08	CALC	369.3	MEASUF	0.103	CALC	608.3	MEASUF	0.169	MEASUF	3599.3	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	19	1	372		315.5	MEASUF	0.088	CALC	369.3	MEASUF	0.103	CALC	60 .8	MEASUF	0.168	MEASUF	3599.8	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	20	1	373		332.9	MEASUF	0.09	CALC	36 .8	MEASUF	0.103	CALC	593.8	MEASUF	0.167	MEASUF	3555.5	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	21	1	373		3 7.1	MEASUF	0.098	CALC	36 .8	MEASUF	0.103	CALC	590.3	MEASUF	0.166	MEASUF	3556	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	22	1	373		357.8	MEASUF	0.101	CALC	362.3	MEASUF	0.103	CALC	582.7	MEASUF	0.165	MEASUF	3531.7	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	17		1/31/2026	23	1	372		367.2	MEASUF	0.103	CALC	36 .7	MEASUF	0.103	CALC	586.6	MEASUF	0.165	MEASUF	355 .9	MEASUF	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS

State	Facil ty Name	Facility D	Unit ID	Associated Stacks	Da e	Hour	Operatin g me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass lbs)	SO2 Mass Measur e Indicato r	SO2 Rate (lbs/mm Btu)	SO2 Rate Measur e Indicato r	CO2 Mass (short tons)	CO2 Mass Measur e Indicato r	CO2 Rate (short tons/m mB u)	CO2 Rate Measur e nd cato r	NOx Mass (bs)	NOx Mass Measur e Indicato r	NOx Rate (lbs/mm Btu)	NOx Rate Measur e ndicato r	Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	R M Schah er Generating Station	6085	18		1/20/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/20/2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/21/2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/22/2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/23/2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/2 /2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/25/2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS

State	Facil ty Name	Facility DUnit ID	Unit ID	Associated Stacks	Da e	Hour	Operatin g me	Gross Load (MW)	Steam Load (1000 b/hr)	SO2 Mass lbs)	SO2 Mass Measur e Indicato r	SO2 Rate (lbs/mm Btu)	SO2 Rate Measur e Indicato r	CO2 Mass (short tons)	CO2 Mass Measur e Indicato r	CO2 Rate (short tons/m mB u)	CO2 Rate Measur e nd cato r	NOx Mass (bs)	NOx Mass Measur e Indicato r	NOx Rate (lbs/mm Btu)	NOx Rate Measur e ndicato r	Heat nput mmBtu)	Heat Input Measur e Indicato r	Primary Fuel ype	Secondary Fuel ype	Unit ype	SO2 Controls	NOx Controls	PM Controls	Hg Controls	Program Code
N	R M Schah er Generating Station	6085	18		1/26/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/26/2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/27/2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	13	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	15	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	16	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	17	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	18	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	19	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	20	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	21	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	22	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/28/2026	23	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	0	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	1	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	2	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	3	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026		0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	5	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	6	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	7	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	8	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	9	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	10	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	11	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
N	R M Schah er Generating Station	6085	18		1/29/2026	12	0																	Coal		Tangen ially- ired	Wet Limes one	Low NOx Burner Techno ogy w/ C osed-coupled/Separated OFA	E ectrosta ic Precipitator		ARP, CSNOX, CSOSG2E, CSSO2G1, MATS
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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 202
PIOs' July Rehearing Request

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator (MISO) and Northern Indiana Public Service Company LLC	)	Order No. 202-26-29
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator (MISO) and CenterPoint Energy Indiana South	)	Order No. 202-26-30

Motion to Intervene and Request for Rehearing and Stay of
Sierra Club, Citizens Action Coalition of Indiana, Just Transition Northwest Indiana, Hoosier Environmental Council, Environmental Law and Policy Center, and Public Citizen (collectively, "Public Interest Organizations" or "PIOs")

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I. INTRODUCTION

The Department of Energy ("Department") is unlawfully using Section 202(c) of the Federal Power Act ("FPA"), 16 U.S.C. § 824a(c), to prevent the retirement of two coal-fired power plants in Indiana: Units 17 and 18 of the R.M. Schahfer Generating Station ("Schahfer") and Unit 2 of the F.B. Culley Generating Station ("Culley 2") (collectively, the "Plants"), which are very expensive and very toxic to operate. The Department is acting pursuant to a new and unprecedented policy to

exceed its carefully constrained emergency authority under Section 202(c) in order to prevent coal plant retirements.

Northern Indiana Public Service Company LLC ("NIPSCO"), the owner of Schahfer, and Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South ("CenterPoint Indiana"), which owns Culley 2, each determined pursuant to years-long, state-mandated integrated resource planning ("IRP") processes that the Plants are no longer needed to serve customer demand past 2025. Accordingly, NIPSCO and CenterPoint Indiana long ago resolved to close the Plants in December 2025.

That long-anticipated transition was disrupted at the end of last year when the Department issued two 90-day orders under Section 202(c) of the Federal Power Act, 16 U.S.C. § 824a(c). See Order No. 202-25-12 (Exhibit 1, the "December Schahfer Order") and Order No. 202-25-13 (Exhibit 2, the "December Culley Order") (collectively, the "December Orders"). Neither of the December Orders offered any lawful basis, rational reasoning, or legitimate evidentiary support for a near-term or long-term emergency justifying the invocation of Section 202(c). Since then, despite Public Interest Organizations refuting the Department's mischaracterizations or misunderstandings of the sources on which it relies (Ex. 168, PIOs' January Rehearing Request; Ex. 193, PIOs' April Rehearing Request), the Department has twice renewed both orders. *See* Ex. 191, Order No. 202-26-29 (the "June Schahfer Order") and Ex. 192, Order No. 202-26-30 (the "June Culley Order") (each an "Order" and collectively, the "Orders"), which followed Ex. 158, Order No. 202-26-19 (the "March Schahfer Order") and Ex. 159, Order No. 202-26-20 (the "March Culley Order"). In its quest to keep the affected coal power plants eventually available, regardless of whether there is an actual shortage the Plants are needed to address, and regardless of whether the power plants are actually operable in the near-term 90-day period, the Department has declined to consider a mountain of evidence contrary to its position. The policy is also unlawful in substance because the carefully constrained emergency authority of Section 202(c) applies only to imminent, unexpected shortfalls, not to the Department's preference for specific types of energy generation.

The Department justifies these intrusive and unnecessary orders by alleging concerns about resource adequacy and reliability, but its concerns are based on selective quotations of some documents, elementary misunderstandings or mischaracterizations of additional documents, and disregard of governing law to engage in a forbidden effort to usurp others' authority. Additionally, the Department fails to reconcile its concerns with the Department's existing authorizations to export power from MISO in which, for instance, the Department finds that markets in the area are sufficiently robust to make supplies available and

that multi-layered and comprehensive reliability processes incentivize maintenance of system resources. Moreover, the concerns expressed in the Orders are primarily not focused on the actual 90-day period at issue (*i.e.*, the period starting on June 22, 2026 and extending to September 19, 2026). The evidence shows there is every reason to believe that the actors with authority over resource adequacy and reliability—FERC, NERC, MISO, Indiana regulators, the electric utility owners, and others—have provided for adequate resources and reliability in the Summer 2026 and Fall 2026 seasons, in all arguably relevant geographies, and will continue doing so going forward.

The Orders will cause (just as the December Orders and March Orders have caused) significant harm. The significant cost caused by the Order, hundreds of thousands of dollars a day, are likely to be borne by households and families in Indiana and ten nearby states. *See infra* sec. IV.C.3; Ex. 5 (Synapse Report); *Northern Indiana Public Service Company LLC v. MISO,* 194 FERC ¶ 61,215 at PP 36-37 (2026); *Southern Indiana Gas and Electric Company v. MISO,* 194 FERC ¶ 61,214 at PP 34-35 (2026). The Department and the federal administration admit that "[a]ll costs" incurred by an affected power plant under a Section 202(c) emergency order "end up on ratepayers." *See* Ex. 188 (Barrons Article); Orders at 9 (each stating that "[r]ate recovery is available")

And there are other more deadly costs as well. Schahfer and Culley 2 are dirty, old plants that spew pollution into the air and into the Kankakee and Ohio Rivers. *See infra* sec. IV.C.3. Operation of all these units leads to premature deaths and deepens the harms to communities already injured by decades of environmental pollution. *See id.*

Public Interest Organizations thus respectfully request that the Department grant intervention; stay the Orders; grant rehearing and rescind the Orders (and any renewals of the Orders); and allow the two Indiana Plants at issue—Schahfer and Culley 2—to retire as planned.[1]

[1] Because the two Orders employ nearly identical language and reasoning and are both addressed to power generating plants in the Indiana zone of the MISO transmission grid, Public Interest Organizations are here submitting a single Request for Rehearing applicable to each of the Orders.

II. STATEMENT OF ISSUES AND SPECIFICATION OF ERROR

The undersigned Public Interest Organizations move to intervene and request rehearing and a stay of both Orders pursuant to Section 313(a) of the Federal Power Act, 16 U.S.C. § 825*l*(a), and the applicable rules of practice and procedure, 18 C.F.R. §§ 385.203, .212, .214, .713; *see* Ex. 8 at PDF 2 (Cooke Email to Alle-Murphy) (recommending that "a party seeking rehearing can look for procedural guidance to [Federal Energy Regulatory Commission's ("FERC")] Rules of Practice and Procedure, 18 CFR Part 385.").[2] Public Interest Organizations' motion and requests are based upon the following errors and issues:

A. The Department has not demonstrated that an emergency exists in any portion of MISO as required by Section 202(c) of the Federal Power Act; nor has the Department demonstrated that an emergency exists as defined in the implementing regulations for Section 202(c). *See, e.g.*, 16 U.S.C §§ 824(a)–(b), 824a(a)–(c); 10 C.F.R. §§ 205.371–.375; *Emergency Interconnection of Elec. Facilities and the Transfer of Elec. to Alleviate an Emergency Shortage of Elec. Power,* 46 Fed. Reg. 39984 (Aug. 6, 1981); *Hughes v. Talen Energy Mktg., LLC*, 578 U.S. 150 (2016); *FDA v. Brown & Williamson Tobacco Corp.*, 529 U.S. 120 (2000); *Jarecki v. G.D. Searle & Co.*, 367 U.S. 303 (1961); *Citizens Action Coal. v. FERC*, 125 F.4th 229 (D.C. Cir. 2025); *Conn. Dep't of Pub. Util. Control v. FERC*, 569 F.3d 477 (D.C. Cir. 2009); *Alcoa Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009); *Cal. Indep. Sys. Op. Corp. v. FERC*,

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[2] Until sometime after June 18, 2025, the Department maintained a webpage with procedures for intervention and rehearing requests. U.S. Dep't of Energy, *DOE 202(c) Order Rehearing Procedures* (visited June 18, 2025), https://www.energy.gov/ceser/doe-202c-order-rehearing-procedures (attached as Ex. 30) [hereinafter "DOE Rehearing Procedures"]. The Department maintains another website which currently states, "All public comments and requests related to FPA section 202(c) should be sent via email to AskCR@hq.doe.gov. . . . Additional information about 202(c) procedures, if necessary, will be announced on this page. The provision of this process for submission of correspondence or comments on any pending application is for purposes of ensuring the receipt by the appropriate office and personnel within the Department. Establishment of this email address does not establish a 'docket,' and those submitting correspondence do not constitute parties or intervenors to any proceeding." U.S. Dep't of Energy, *DOE's Use of Federal Power Act Emergency Authority* (last visited July 10, 2026), https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority (attached as Ex. 74) [hereinafter "DOE 202(c) Webpage"]. Public Interest Organizations' instant motion and requests are also pursuant to the DOE 202(c) Webpage and the DOE Rehearing Procedures.

372 F.3d 395 (D.C. Cir. 2004); *Otter Tail Power Co. v. Federal Power Commission*, 429 F.2d 232 (8th Cir. 1970); *Richmond Power & Light v. FERC*, 574 F.2d 610, 615 (D.C. Cir. 1978); *Duke Power Co. v. Fed. Power Com.,* 401 F.2d 930, 938 (D.C. Cir. 1968).

B. Even if the emergency described by the Orders did exist—it does not—the Department has not demonstrated a reasoned basis for its determination that additional dispatch of Schahfer and Culley 2 is necessary to "best meet the emergency and serve the public interest." See, e.g., 16 U.S.C. § 824a(c); 10 C.F.R. §§ 205.373, 205.375; Dep't of Homeland Sec. v. Regents of the Univ. of Calif., 591 U.S. 1 (2020); Entergy Corp. v. Riverkeeper, Inc., 556 U.S. 208 (2009); *Allentown Mack Sales & Service, Inc. v. NLRB*, 522 U.S. 359 (1998); *Motor Vehicle Mfrs. Ass'n of the U.S. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29 (1983); *NAACP v. Fed. Power Comm'n*, 425 U.S. 662 (1976); *Gulf States Utils. Co. v. Fed. Power Comm'n*, 411 U.S. 747 (1973); *Otter Tail Power Co. v. United States*, 410 U.S. 366 (1973); *California v. Fed. Power Comm'n*, 369 U.S. 482 (1962); *Pa. Water & Power Co. v. Fed. Power Comm'n*, 343 U.S. 414 (1952); *Nat'l Shooting Sports Found., Inc. v. Jones*, 716 F.3d 200 (D.C. Cir. 2013); *Chamber of Com. of the U.S. v. Secs. & Exch. Comm'n*, 412 F.3d 133 (D.C. Cir. 2005); *Sierra Club v. Env't. Prot. Agency*, 353 F.3d 976, 980 (D.C. Cir. 2004); *Wabash Valley Power Ass'n, Inc. v. FERC*, 268 F.3d 1105 (D.C. Cir. 2001).

C. The Orders' availability requirements and override of Schahfer and Culley 2's federal tariff-defined capacity treatment each exceed the Department's authority and are unreasoned. *See, e.g.*, 16 U.S.C. §§ 824(a)–(b), 824a(b)–(c); *Gallardo v. Marstiller*, 596 U.S. 420 (2022); *Hughes v. Talen Energy Mktg., LLC*, 578 U.S. 150 (2016); *FERC v. Elec. Power Supply Ass'n*, 577 U.S. 260 (2016); *Gomez-Perez v. Potter*, 553 U.S. 474 (2008); *Allentown Mack Sales & Service, Inc. v. NLRB*, 522 U.S. 359 (1998); *Fed. Power Comm'n v. Fla. Power & Light Co.*, 404 U.S. 453 (1972); *Conn. Light & Power v. Fed. Power Comm'n*, 324 U.S. 515 (1945); *Conn. Dep't of Pub. Util. Control v. FERC*, 569 F.3d 477 (D.C. Cir. 2009).

D. The Department has unlawfully failed to ensure that the Orders require generation of electric energy only during hours necessary to meet the emergency and serve the public interest, that operations are consistent with any applicable environmental laws and regulations to the maximum extent practicable, and that any adverse environmental impacts are minimized. *See, e.g.*, 16 U.S.C. § 824a(c)(2); *Kingdomware Techs., Inc. v. United States*, 579 U.S. 162 (2016); *Fla. Power & Light Co. v. FERC*, 88 F.3d 1239 (D.C. Cir. 1996); *City of New Orleans v. FERC*, 67 F.3d 947 (D.C. Cir. 1995); Ex. 9 (DOE

Order No. 202-22-4); Ex. 6 (DOE Order No. 202-17-4 Summary of Findings); Ex. 110 (DOE Order No. 202-24-1); Ex. 160 (Department Order No. 202-26-01); Ex. 161 (Department Order No. 202-26-01A)..

III. INTERVENORS' INTERESTS

As further discussed below, each of the Public Interest Organizations has interests that may be directly and substantially affected by the outcome of these proceedings. Each party may therefore intervene in these proceedings. 18 C.F.R. § 385.214; *see* Ex. 30 (DOE Rehearing Procedures); Ex. 74 (DOE 202(c) Webpage as of July 13, 2026); Ex. 8 (Cooke Email to Alle-Murphy).

The Public Interest Organizations also demonstrate concrete injuries arising from the Orders that are redressable by a favorable outcome. Each organization is therefore aggrieved by the Department's Orders and may properly apply for rehearing. *See* 16 U.S.C. § 825*l*(a); *Wabash Valley Power Ass'n, Inc. v. FERC*, 268 F.3d 1105, 1112 (D.C. Cir. 2001); 18 C.F.R. §§ 385.203, 385.713; Ex. 30 (DOE Rehearing Procedures); Ex. 74 (DOE 202(c) Webpage as of July 13, 2026); Ex. 8 (Cooke Email to Alle-Murphy).

A. Sierra Club

As of June 2026, over 8,000 Sierra Club members reside in Indiana. Sierra Club members are harmed by pollution produced by operating the Culley and Schahfer coal units. Sierra Club has over 900 members in Jasper County, Indiana, where Schahfer is located, and the adjoining counties. Sierra Club has approximately 300 members in Warrick County, Indiana, where Culley is located, and the adjoining counties. The Orders to operate these Plants beyond their planned retirement date will subject Sierra Club members to additional air and water pollution in the areas where they live, work, and recreate. In addition, Sierra Club members include people who pay for electricity from CenterPoint Indiana and NIPSCO.

Sierra Club has demonstrated an organizational commitment to the interests of reducing pollution and harm from these coal-burning power plants. Sierra Club's Beyond Coal Campaign seeks to reduce the pollution currently being produced by coal-burning power plants such as Culley and Schahfer, and to reduce energy bills by ensuring that ratepayers do not fund the cost of continuing to operate uneconomic coal plants like Culley and Schahfer. To those ends, Sierra Club has advocated for the retirement of the Culley plant in multiple regulatory proceedings, including CenterPoint Indiana's 2016, 2020, 2023, and 2025 Integrated Resource Plan stakeholder processes, a fuel adjustment clause docket related to forced outages at the Culley plant, and electric rate cases. Sierra Club has also submitted

comments to the Indiana Department of Environmental Management on draft air and water permits for the Culley plant, advocating for more stringent pollution requirements. Sierra Club has advocated for the retirement of Schahfer in several regulatory proceedings, including a certificate of public necessity proceeding for retrofits at the Schahfer plant in 2017, and NIPSCO's 2014, 2016, and 2018 Integrated Resource Plan stakeholder processes. In 2019, Sierra Club signed a multi-party settlement in NIPSCO's electric rate case that adjusted the depreciation schedule for the Schahfer plant to align with a 2023 retirement and that provided that electric customers were to receive a bill credit upon the plant's retirement.

Sierra Club has invested staff and volunteer time, as well as significant financial resources to hire experts, to advocate for the retirement of Culley and Schahfer. Sierra Club has submitted hundreds of individual comments to the utilities and Indiana Commission advocating for the retirement of these coal units. By denying these and other benefits of the Culley 2 and Schahfer Plants' retirements, the Orders harm Sierra Club and its members.

B. Citizens Action Coalition of Indiana

Citizens Action Coalition of Indiana, Inc. ("CAC") is Indiana's oldest and largest consumer and environmental advocacy organization. Since 1974, CAC has helped Hoosiers save more than $10 billion in excess utility charges. CAC advocates on behalf of Hoosiers on issues regarding energy policy, utility reform, health care, pollution prevention, and family farms. CAC's activities include research, public education, organizing citizens, lobbying, intervening in utility cases before the Indiana Utility Regulatory Commission ("IURC"), and litigating when necessary. CAC engages in rate cases, cost recovery proceedings, certificates of public convenience and necessity proceedings, demand side management proceedings, and numerous other matters impacting the cost or reliability of Hoosiers' energy services, including numerous proceedings associated with the planned retirements of Schahfer and Culley 2. CAC also participates in the rigorous Integrated Resource Plan stakeholder processes required for Indiana's jurisdictional electric utilities submitting integrated resource plans every three years according to Indiana Code § 8-1-8.5-3(e)(2).

C. Just Transition Northwest Indiana

Just Transition Northwest Indiana ("JTNWI"), a nonprofit corporation chartered under the laws of Indiana, is a grassroots environmental justice organization serving the Northwest Indiana region, primarily Lake, Porter, LaPorte, and Jasper Counties, that centers on organizing and base-building activities. JTNWI's mission

is to educate and organize Northwest Indiana communities and workers, give voice to our shared stories, and support a just transition to a regenerative economy that protects the environment, climate, and future generations. Since the organization's formation in 2020, JTNWI has worked tirelessly on issues related to utility affordability, pollution response and accountability, and industrial decarbonization within the NIPSCO service territory, including Wheatfield and Jasper County, Indiana, where the R.M. Schahfer Generating Station is located, communities JTNWI serves whose health and livelihoods will be adversely impacted by the 202(c) emergency order. JTNWI works across the local, state, and federal levels, including advocating for coal ash waste clean closures, plant retirements, and just transition planning in fossil fuel-impacted communities in the region, and is actively involved in public comment periods and interventions in NIPSCO electric rate cases before the Indiana Utility Regulatory Commission and in environmental permits with the Indiana Department of Environmental Management and the United States Environmental Protection Agency.

D. Hoosier Environmental Council

Hoosier Environmental Council, Inc. ("HEC") is a 501(c)(3), non-profit, public interest environmental policy and advocacy organization chartered under the laws of Indiana. Since its formation in 1983, HEC has been and continues to be committed to protecting Indiana's air, land, waterways and wildlife habitat through initiatives in education, research, technical assistance, public policy advocacy, and legal action including the enforcement of federal and state laws that protect Indiana's natural resources. To further its mission, HEC actively seeks federal and state agency implementation and enforcement of environmental laws and regulations, and when necessary initiates enforcement actions on behalf of HEC and its members. For more than 40 years, HEC has advocated for measures to reduce the harm that coal-fired power does to land, air, water, and human health. HEC has been active regarding the Schahfer and Culley 2 sites, as well as many current and former coal-fired power plants, advocating on behalf of its members for safe closure of coal-fired power stations and proper closure of coal combustion residual waste ponds and landfills. HEC's interest is in protection of air, water and land quality at and around these sites.

E. Public Citizen

Established in 1971, Public Citizen is a national research and advocacy organization representing the interests of household consumers. Public Citizen has members and supporters in every state, including those who pay electric utility bills in Indiana and the Midwest. Public Citizen is active before the Federal Energy Regulatory Commission promoting just and reasonable rates, and in supporting

efforts for utilities to be accountable to the public. Financial details about the organization are on its website. Public Citizen, Annual Reports, www.citizen.org/about/annualreport.

F. Environmental Law and Policy Center

Environmental Law and Policy Center ("ELPC") is a not-for-profit environmental organization headquartered in Chicago with members and contributors throughout the Midwest, including in Indiana. Among other things, ELPC advocates before the Indiana Utility Regulatory Commission and the Federal Energy Regulatory Commission for clean, reliable energy generation in order to reduce ratepayer costs and improve environmental outcomes. ELPC has participated in IURC cases and matters involving NIPSCO and other Indiana utilities. See, *e.g.*, IURC Cause No. 44688 (NIPSCO 2015 Rate Case); IURC Cause No. 45378 (Vectren [n/k/a CenterPoint Indiana] Distributed Generation Rider); Duke Energy Indiana 2024 IRP.

IV. BACKGROUND

A. The Primary Actors in the Electric Industry Already Protect Resource Adequacy Without Intrusion from the Department.

1. The Federal Energy Regulatory Commission Regulates Wholesale Electricity Markets and Mechanisms that Acquire Adequate Resources.

FERC regulates wholesale sales and transmissions of electric energy in interstate commerce. 16 U.S.C. § 824(b)(1). Federal authority over the electric grid dates back at least to 1935, when the Federal Power Act became law and the Federal Power Commission administered the Act.

The Federal Power Act did not give the federal agency plenary authority over the electric grid. Instead, Congress provided that federal regulation shall "extend only to those matters which are not subject to regulation by the States" and provided that "[t]he Commission" does not have jurisdiction, "except as specifically provided in [the Federal Power Act], over facilities used for the generation of electric energy." *Id.* at § 824(a)–(b)(1). As such, authority over generation facilities belongs to the states. *See id.*

In 1977, through the Department of Energy Organization Act, Congress reorganized the agencies that administer the Federal Power Act. Congress created the Department of Energy and FERC. 42 U.S.C. §§ 7131, 7171(a). Congress also transferred certain functions of "the Commission" in the Federal Power Act to the

Department and other functions to FERC, thereby abolishing the Federal Power Commission. *See id.* §§ 7151(b), 7172(a)(1). FERC retained authority over rates and charges for the transmission of electric energy or sale of electric energy at wholesale (in both cases, in interstate commerce), and the non-emergency interconnection of facilities for the generation, transmission, and sale of electric energy. *Id.* § 7172(a)(1)(B); 16 U.S.C. § 824(a). The Department's authority over functions of "the Commission" in the Federal Power Act includes functions under some subsections of Section 202 of the Act. *See* 42 U.S.C. § 7151(b). The 1977 reorganization did not expand the role of the "the Commission" at the expense of state authority or shrink states' authority over generation facilities. *See, e.g.*, *id.* § 7113 ("Nothing in this chapter shall affect the authority of any State over matters exclusively within its jurisdiction.").

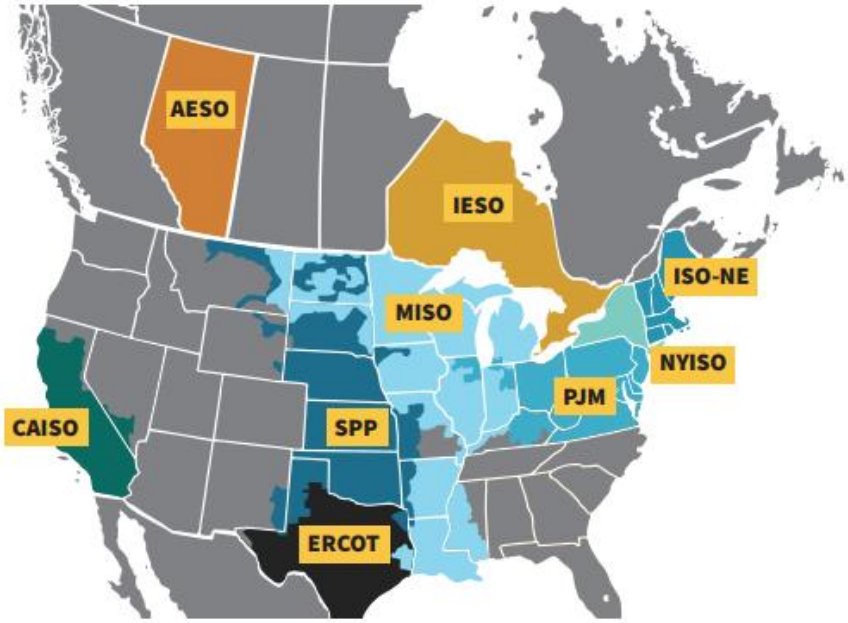
As part of its regulatory oversight, FERC has promoted the role of nonprofit entities, known as Independent System Operators or Regional Transmission Organizations, in bulk power system operations and planning. *See FERC v. Elec. Power Supply Ass'n*, 577 U.S. 260, 267 (2016); *Regional Transm. Orgs.*, Order No. 2000, 65 Fed. Reg. 810, 811 (Jan. 6, 2000); *Promoting Wholesale Competition Through Open Access Non-Discriminatory Transm. Servs. by Pub. Utils. and Recovery of Stranded Costs by Pub. Utils. and Transm. Utils.*, Order No. 888, 61 Fed. Reg. 21540, 21542 (May 10, 1996). FERC generally regulates these entities pursuant to its authority over rates and charges for wholesale sales and transmissions of electric energy. *See, e.g.*, Order No. 2000, 65 Fed. Reg. at 811. These entities, referred to here as ISOs or RTOs, perform a variety of functions, including:

- Ensuring the electric grid operates reliably in a defined geographic footprint;
- Balancing supply and demand instantaneously and maintaining sufficient operating reserves;
- Dispatching system resources as economically as possible;
- Coordinating system dispatch with neighboring balancing authority areas;
- Planning for transmission in its footprint;
- Coordinating system development with neighboring systems and participating in regional planning efforts; and
- Providing non-discriminatory transmission access.

Ex. 46 at 53 (FERC Energy Primer). Some ISOs "also operate capacity markets, which, along with underlying resource adequacy rules, ensure sufficient capacity is available." *Id.* at 68.

Independent System Operators now span much of the country, excluding portions of the Southeast, Southwest, and Northwest regions of the country. *See id.* at 37. The map in Figure 1 below depicts the geographic footprint of the various ISOs.

***Figure 1**: Boundary Areas of RTOs and ISOs*

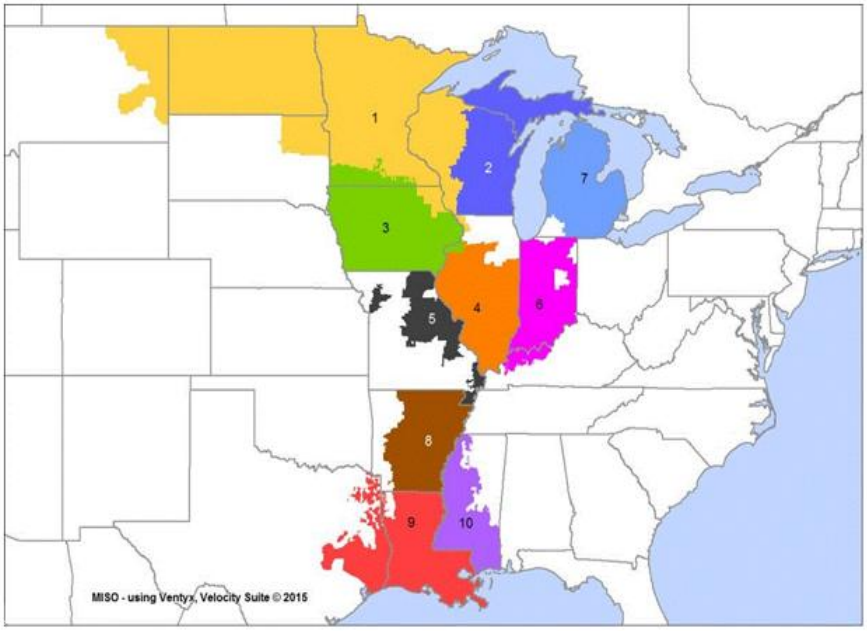


Source: Ex. 46 at 67 (FERC Energy Primer).

2. MISO Protects Reliability and Resource Adequacy Through FERC-Regulated Reserve Margin Requirements, a Residual Capacity Auction, and Retirement Approvals.

MISO is an Independent System Operator and the grid operator for territory stretching roughly from North Dakota to Michigan and down to Louisiana. This territory is organized into zones numbered 1 through 10, as shown in MISO's FERC-approved tariff and reproduced in Figure 2 below.

***Figure 2**: MISO Local Resource Zones 1–10*



Source: Ex. 75 (MISO Tariff Zonal Map).

MISO implements resource adequacy standards across its territory to ensure it achieves a level of grid reliability meeting both industry standards and those of the North American Electric Reliability Corporation ("NERC"). To meet its resource adequacy requirements, MISO utilizes a series of interrelated mechanisms that both measure current and future system needs and help the utilities in its region secure the resources that best meet those needs at least cost. *See generally* Ex. 46 at 66–75, 87–90 (FERC Energy Primer); Ex. 3 at 8–9 (EFG Report).

i. Reserve Margin Requirements.

The foundation of MISO's resource adequacy implementation process is its Loss of Load Expectation ("LOLE") study, which measures whether available generation capacity is capable of meeting load demand under various conditions, including low probability but high impact events (such as extreme weather). *See generally* Ex. 38 (MISO LOLE Presentation). MISO runs its LOLE study every year, based on the latest available data. It utilizes a systemic model, taking inputs from the past thirty years of weather data as well as resource performance characteristics from a broad range of operating conditions. Using this wealth of information, MISO then runs thousands of simulations looking to future years. Each of the simulations examines the system at every individual hour of each year being studied. These simulations identify circumstances that could most stress the system, while also predicting how the system's fleet of resources will perform. *See* Ex. 58 (MISO Tariff Module E-1); Ex. 38 (MISO LOLE Presentation); Ex. 81 at 47-54 (Joundi Testimony). MISO runs this model annually, based on the latest available data.

MISO uses its LOLE study results in conjunction with its system-wide peak demand forecast, which it develops from projections provided by each of the load-serving entities within its territory. It combines these inputs to determine how much generating capacity is required to meet MISO's industry-standard goal of expecting no more than one day with a loss of load event every ten years. *See* Ex. 10 at 2–5 (Grid Strategies June Report). The result of this calculation is a reasonable buffer of extra capacity to account for potential emergencies and other conditions, which is known as the regional Planning Reserve Margin ("Reserve Margin"). The Reserve Margin, stated as a percentage, reflects the amount of generating capacity that must be procured in each season to meet resource adequacy standards across the region. MISO develops a separate Reserve Margin for each season of the year. An illustrative calculation of a Reserve Margin is below.

Illustrative Reserve Margin Calculation

Expected Peak Demand	100,000 MW
Extra Buffer	7,000 MW
Reserve Margin	**7%**

After developing the system-wide Reserve Margin, MISO uses it to convert the peak demand projection for each zone into a capacity requirement (in accredited megawatts, or "MW") that each zone must meet for each season. The requirement for each zone is known as that zone's Planning Reserve Margin Requirement ("Reserve Margin Requirement"), which is the megawatt capacity that must be procured for each zone. These megawatts can come from inside or outside the zone, so long as they are deliverable to the zone. *See* Ex. 3 at 8–9 (EFG Report).

As with the zonal calculation, MISO also converts each individual load-serving entity's projected peak demand into a capacity requirement using the system-wide Reserve Margin. A load-serving entity is, like NIPSCO and CenterPoint Indiana, an entity that "has undertaken an obligation to serve [l]oad for end-use customers by statute, franchise, regulatory requirement or contract." *See* MISO's FERC-Approved Tariff at Module A (as currently effective), https://etariff.ferc.gov/TariffBrowser.aspx?tid=1162 (defining "Load Serving Entity"). And the Reserve Margin Requirement for each zone is, roughly speaking, the sum of all load-serving entities' obligations in that zone.

Finally, MISO assigns to each individual resource a capacity value based on MISO's conservative estimate of how likely that generator is to be able to provide energy during peak net demand conditions. The purpose of this estimate is to determine a percentage of resources' maximum capacity (their "accredited capacity") that can be used by load-serving entities or in the Planning Resource Auction to achieve Reserve Margin Requirements, and it reflects that resources cannot always ensure that they will operate at their maximum possible capacity. Generally

speaking, MISO's approach combines probabilistic modeling with historic and unit-specific performance. Through the capacity accreditation process, MISO fully accounts for the limitations of each resource's ability to contribute to MISO's resource adequacy during peak demand conditions or during times of overall system stress (*e.g.*, when extreme weather affects unit performance). And MISO's capacity accreditation rules are regulated and overseen by FERC. *See, e.g.*, *Midcontinent Indep. Sys. Op., Inc.*, 180 FERC ¶ 61,141, at P 1 (2022) (approving MISO's seasonal resource adequacy construct); *see also Midcontinent Indep. Sys. Op., Inc.*, 189 FERC ¶ 61,065, at P 1 (2024) (approving new methodology applicable to 2028–2029 delivery year).

Once MISO (1) establishes the regional Reserve Margin, (2) converts it to a Reserve Margin Requirement for each zone using peak demand projections, (3) apportions each zone's Reserve Margin Requirement among load-serving entities, and (4) determines all eligible resources' accredited capacity, the load-serving entities must meet their capacity obligations. *See* Ex. 3 at 8–9 (EFG Report).

Load-serving entities have a few options for procuring capacity. First, they can use generating capacity they already own. Second, they can contract with another entity that owns generating capacity to promise to sell energy in the future when called upon by MISO to do so. Third, as a final fallback option they can obtain capacity through a residual capacity market run by MISO known as the Planning Resource Auction ("Planning Auction" or "PRA"). *See id.*

ii. MISO's Residual Capacity Market.

MISO conducts the Planning Auction every year. The Planning Auction is actually four separate simultaneous seasonal auctions. In each auction, MISO solicits operational commitments for each season from a suite of generation resources that will ensure resource adequacy. Many resources provide an "offer" identifying what price they would need to be paid to keep operational (*i.e.*, remain capable of delivering power upon command) all or part of the resource's accredited capacity for each of the four seasons. Other resources, including those already committed to operate via outside contracts, are self-scheduled into the auction process, meaning that MISO treats them as price takers or $0 offers. MISO then stacks each of these resources in ascending cost order, forming a supply curve.

The supply curve crosses a preset sloped demand curve, known as the Reliability Based Demand Curve. The sloped demand curve is designed by MISO to procure a certain amount of capacity at each price point; although it is tethered around MISO's goal of experiencing no more than one loss of load event per decade, it will obtain more capacity if it is cheaper and less if it is more expensive. This is

consistent with the general principle that grid operators must always balance the tradeoff between resource adequacy and cost. *See* Ex. 10 at 2–3 (Grid Strategies June Report); Ex. 3 at 8–9 (EFG Report); Ex. 31 at 4 (MISO 2025–26 Auction Results); Ex. 185 at 5 (MISO 2026–27 Auction Results).

The point where the supply and demand curves intersect is called the capacity market clearing price. All resources on the supply curve with offers at or below that amount are then committed to remain operational and be available for the respective season(s) in which they cleared, with the owners of those resources' capacity rights receiving the clearing price. Ex. 58 (MISO Tariff Module E-1).

iii. MISO's Approvals of Generator Retirements.

Pursuant to MISO's FERC-approved tariff, a utility within MISO seeking to suspend the operation of a generating unit must provide an "Attachment Y" notice to MISO. Ex. 60 at 1 (MISO Tariff Sec. 38.2.7); Ex. 61 (MISO Tariff Attachment Y). The purpose of the notice is to enable MISO to evaluate the potential local grid reliability impacts of such suspension. If retirement would cause unacceptable reliability impacts, MISO may offer compensation to keep the resource active as a System Support Resource. *See* Ex. 60 at PDF p. 5 (MISO Tariff Sec. 38.2.7).

3. MISO Also Continuously Monitors the Grid to Balance Supply and Demand, and to Prevent Blackouts Using an Escalating Sequence of Real-Time Alerts that Activate Reserve Resources in a Specific, Predetermined Order.

In addition to annually securing the set of resources it has determined will meet its regional reliability standard, MISO also operates the grid on a daily and hourly basis to match the resources it has available with load (*i.e.*, demand) over the course of each day. During normal operational periods, MISO uses its energy markets to receive information from every potential resource in the region (generators, batteries, etc.) about how much power they believe they can provide and at what price, and then issues instructions to the set of resources it needs to meet projected demand at least cost to the system. *See generally Elec. Power Supply Ass'n*, 577 U.S. at 268 ("Each administers a portion of the grid, providing generators with access to transmission lines and ensuring that the network conducts electricity reliably. And still more important for present purposes, each operator conducts a competitive auction to set wholesale prices for electricity. These wholesale auctions serve to balance supply and demand on a continuous basis, producing prices for electricity that reflect its value at given locations and times throughout each day." (internal citation omitted)).

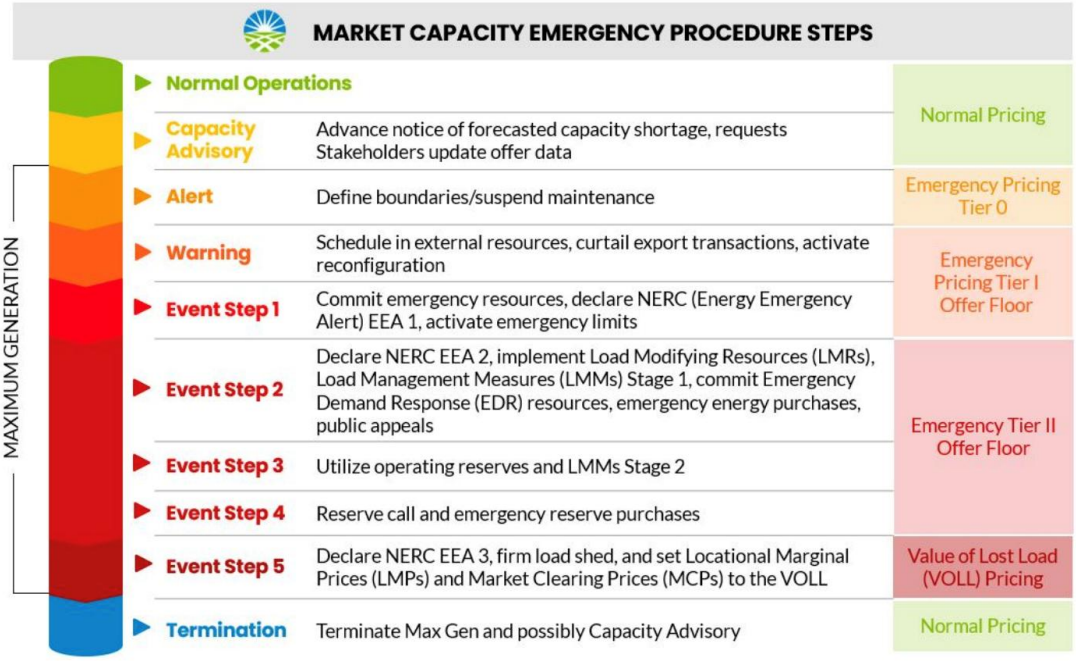
On occasion, the total electric generation that is freely offered in MISO's day-ahead market is less than the MISO region's projected demand. That mismatch

between projected demand and voluntary supply does not, however, of itself produce any disruption to the grid. In these instances, MISO implements a well-defined process to identify additional resources until the projected shortfall is addressed.

MISO has enshrined its process for securing extra resources to address projected shortfalls, which it deems "Max Gen Emergencies," in its operational tariff. Ex. 33 at §§ 4.2–4.3 (MISO Market Capacity Emergency) (describing Max Gen Emergency Event procedures). As described there, MISO often can address any shortfall simply by issuing a capacity advisory to double check its numbers, followed by a so-called "max-gen" alert to facility operators to suspend any optional maintenance or other activities that might be interfering with resources' power output (*i.e.*, to achieve maximum generation from all available resources). *Id.* at §§ 4.1, 4.2.2. MISO can then issue a warning of a potential shortfall and start curtailing exports and coordinating with its neighbors to bring in imports from adjacent regions. *Id.* at § 4.2.3. If these preliminary measures don't address the shortfall, MISO will then proceed step by step through a series of five steps with subparts (labeled "1a" through "5") of increasingly stringent mitigation measures to increase generation or reduce usage of electricity during the period at issue. Only on the final step (step "5") does any involuntary load shedding (*i.e.*, a blackout) occur; Steps "1a" through "4b" describe an escalating sequence of mitigation measures MISO will employ, including requesting power transfers from neighboring regions, turning on backup generators, utilizing contracted demand response resources, and asking the public for voluntary reductions. *See* Ex. 33 (MISO Market Capacity Emergency); Ex. 3 at 7 (EFG Report). The following table, prepared by MISO and reproduced here as Figure 3, describes these steps (without delineating between "step 1a," "step 1b," etc.).[3]

[3] The following is a partial explanation of acronyms in the table: MPs means Market Participants; LBAs means Load Balancing Authorities; AME means Available Maximum Emergency; EEA means Energy Emergency Alert; LMM means Load Management Measures; LMRs means Load Modifying Resources; EDR means Emergency Demand Response; LMPs means Locational Marginal Prices; MCPs means Market Clearing Prices; and VOLL means Value of Lost Load. Ex. 33 (MISO Market Capacity Emergency) at 2, 3, 8, 13, 19, 34.

***Figure 3**: Market Capacity Emergency Procedure Steps*



Source: Ex. 33 at 43 (MISO Market Capacity Emergency).

Through a combination of responsible grid management and capacity retention policies, MISO has avoided the need to utilize the full five steps of its emergency process in recent years. MISO has not faced a Market Footprint Maximum Generation Emergency Event Step of 3 or higher since 2009, according to the most recent summation available (through June 2024)—and the highest Max Gen event in both the recent Summer 2025 season and the Winter 2025–2026 season reached only Step 2c, below Step 3. *See* Ex. 32 at 4–27 (MISO Emergency Declarations); Ex. 68 at 3–4 (Grid Strategies Sept. Report); Ex. 173 at 1 (Konidena April 2026 Decl.). For the Fall 2025 season that recently concluded, PIOs are not aware of any EEA alert having been issued. Moreover, MISO Staff's December 2025 presentation to MISO's Board of Directors indicated that "No reliability actions were needed this fall" and showed on a granular daily level that no alerts, warnings, or reliability actions or events occurred in the Fall 2025 season. Ex. 138 at 11 (MISO Fall 2025 Operations Report).

For the recently concluded Winter 2025–2026 season, MISO avoided the need to utilize any Max Gen event beyond Step 2c, even during Winter Storm Fern in the latter part of January. Even during the storm's most challenging hours, MISO had more than 5,000 MW of surplus generation above the level needed to serve the system load, multiples of what Schahfer and Culley 2 could provide (if they were all fully operational). Ex. 173 at 5 (Konidena April Declaration) (showing surplus

generation in table 3); *id* at 4 (describing how the listed values "represent a floor on the potential amount of resources available to MISO."). Winter Storm Fern constitutes the latest demonstration that MISO's Maximum Generation procedures can secure additional operating capacity when needed to meet load.

4. Indiana Evaluates Resource Adequacy Through Integrated Resource Planning and Annual Capacity Procurement Requirements.

Electric utilities in Indiana are required, pursuant to legislation enacted over a decade ago, to submit to the Indiana Utility Regulatory Commission (the "Indiana Commission") an "integrated resource plan that assesses a variety of demand side management and supply side resources to meet future customer electricity service needs in a cost effective and reliable manner." Ind. Code § 8-1-8.5-3(e)(2). By rule, the Indiana Commission requires utilities—including NIPSCO and CenterPoint Indiana—to submit their IRP for review every three years. 170 IAC 4-7-2(a). Following submission of the IRP, customers and interested parties may submit comments to the Indiana Commission; this is followed by a draft report issued by the Indiana Commission's designated director, another round of stakeholder comment, and then a final report from the Indiana Commission's designated director. The director's report is to comment on the IRP's compliance with requirements for its contents. 170 IAC 4-7-2.2(a)–(g).

And those required contents are extensive. A utility's integrated resource plan must include the following, among other requirements:[4]

(1) At least a twenty-year future period for predicted or forecasted analyses;

(2) An analysis of historical and forecasted levels of peak demand and energy usage, including historical load shapes, actual and weather-normalized energy and demand levels; assumptions as to demographic, economic, and technological changes;

(3) At least three alternative forecasts of peak demand and energy usage;

(4) A description of the utility's existing resources, including expected retirements, deratings, life extensions, repowerings, and refurbishments; fuel price forecasts by generating unit; and analysis of the transmission system's effects on power supply;

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[4] The following partial description of requirements is condensed slightly from the language used in Indiana's regulatory code.

(5) A description of the utility's process for selecting possible alternative future resources for meeting future demand, including a cost-benefit analysis, if performed;

(6) A description of the possible alternative future resources for meeting future demand, including demand-side, supply-side, and transmission resources;

(7) . . .

(8) A description of candidate resource portfolios and the process for developing those portfolios, including how the candidate portfolios performed across a wide range of scenarios, and the cost of each portfolio;

(9) A description of the utility's preferred resource portfolio, including a description of how the preferred resource portfolio balances cost effectiveness, reliability, and portfolio risk and uncertainty;

(10) A short-term action plan for the next three-year period to implement the utility's preferred resource portfolio and its workable strategy, including an implementation schedule and budget;

(11) A discussion of inputs, methods, and definitions used in the IRP;

(12) Appendices of data sets and sources used in the IRP;

(13) A description of the utility's effort to develop and maintain a database of electricity consumption patterns, disaggregated by several classes of users;

(14) . . .

(15) A proposed schedule for industrial, commercial, and residential customer surveys;

(16) A discussion of the use of advanced metering infrastructure for enhancing usage data and improving load forecasts, DSM programs, and other aspects of planning;

(17) . . .

(18) A discussion of distributed generation and its effect on planning;

(19) . . .

(20) A discussion of how the utility's fuel inventory and procurement planning practices have been taken into account;

(21) . . .

(22) A description of the generation expansion planning criteria;

(23) A discussion of how compliance costs for existing or reasonably anticipated air, land, or water environmental regulations impacting generation assets have been taken into account;

(24) A discussion of how the utilities balanced resource planning objectives including cost effectiveness, rate impacts, risks, and uncertainty;

(25) A description of the base case scenario;

(26) A description and analysis of alternative scenarios;

(27) A brief description of transmission modeling in the Indiana system;

(29) An explanation of the avoided cost calculation for demand side resources;

(30) A summary of the utility's most recent public advisory process.

170 IAC 4-7-4 to 4-7-9; *see also* Ex. 3 at 1 (EFG Report).

While the Indiana Commission does not directly approve or reject the utility's integrated resource plan (beyond the director's reports described above), any action an Indiana utility takes that impacts its generation mix, including applying for a Certificate of Public Convenience and Necessity for a generating resource, must be consistent with its most recently submitted IRP, unless differences between the most recent IRP and the resource action are fully explained and justified with supporting evidence. Ind. Code § 8-1-8.5-5(b)(2)(B); 170 IAC 4-7-2.5(b). Thus, IRPs are stable and consequential utility planning documents that are given considerable scrutiny by the Indiana Commission.

In addition to submitting IRP analyses, electric utilities located within Indiana's MISO transmission area are required to pass on to the Indiana Commission their annual planning reserve margin report submitted to MISO. Utilities are also required to submit their annual resource adequacy assessment to the Indiana Commission within twenty-five days of submitting the report to MISO. 170 IAC 4-7-2.3(a). Additionally, an electric utility in Indiana is required to demonstrate annually to the Indiana Commission that for both the Summer and Winter seasons, no more than 15% of its allocated capacity requirement will be acquired from the relevant RTO capacity auction. In other words, each utility must demonstrate that it either owns or has under contract 85% of its capacity requirement. Ind. Code § 8-1-8.5-13.

5. NERC Protects Reliability via Standards and Regular Assessments.

NERC is the "Electric Reliability Organization" under Section 215 of the Federal Power Act. *N. Am. Elec. Reliab. Corp.*, 116 FERC ¶ 61,062, at P 3, *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006); *see* 16 U.S.C. § 824o(a)(2). This role dates back to 2005, after Congress added Section 215 to the Act and FERC certified NERC as the Electric Reliability Organization. Energy Policy Act of 2005, Pub. L. No 109-58, Title XII, Subtitle A, section 1211(a), 119 Stat. 594, 941 (2005), 16 U.S.C. § 824o (2000 & Supp. V 2005); 116 FERC ¶ 61,062, at P 16.

As the Electric Reliability Organization, NERC is responsible for establishing and enforcing reliability standards for the bulk power system. 16 U.S.C. § 824o(a)(2); 18 C.F.R. § 39.1. NERC's reliability standards are subject to FERC's review and approval. 16 U.S.C. § 824o(d); Ex. 10 at 7 (Grid Strategies June Report).

The NERC-developed and FERC-approved reliability standards apply to all users, owners, and operators of the bulk power system within the continental United States. 16 U.S.C. § 824o(b)(1); 18 C.F.R. §§ 39.2, 40.1(a), 40.2(a); *see* 18 C.F.R. § 39.1 (defining "Bulk-Power System"). Each reliability standard identifies the types of entities that must comply with the standard, such as generator owners, transmission owners, or transmission operators. *Reliability Standard Compliance and Enforcement in Regions with Regional Transm. Orgs. or Indep. Sys. Ops.*, 122 FERC ¶ 61,247, at P 4 (2008); *e.g.*, Ex. 130 (NERC Emergency Ops., EOP-011-4) (stating requirements applicable to, *inter alia*, balancing authorities, reliability coordinators, and transmission operators for the purpose of "address[ing] the effects of operating Emergencies by ensuring each Transmission Operator and Balancing Authority has developed plan(s) to mitigate operating Emergencies and that those plans are implemented and coordinated within the Reliability Coordinator Area as specified within the requirements"). Independent System Operators like MISO must comply with applicable NERC standards, and they are subject to penalties for noncompliance. 122 FERC ¶ 61,247, at PP 1, 5, 16; *see also* MISO Tariff Schedule 34 (setting forth allocation costs associated with monetary penalties assessed against MISO for violation of NERC standards).

NERC performs other functions in addition to development and enforcement of reliability standards. For instance, NERC annually assesses seasonal and long-term reliability of the bulk power system and monitors system performance. *See* Ex. 10 at 7–8 (Grid Strategies June Report); 18 C.F.R. § 39.11. As part of these assessments, an "elevated risk" designation does not constitute an emergency because it does not indicate the possibility of imminent shortfalls; indeed, it is only the second of three risk levels offered by NERC. NERC typically provides specific context and details associated with its determination. Since it began providing standardized "risk"

assessments by region in the summer of 2021, NERC has adhered to a three-tiered assessment of risk: areas facing the least risk are "low" or "normal" risk regions, areas facing the most risk are "high" risk regions, and areas in between are "elevated" risk regions. *See* Exs. 42A at PDF pp. 74–75, 42B at pp. 35 & 81, 42C at p. 42 (2019–24 NERC Summer Reliability Assessments). The details of the three risk levels are explained further below in Figure 4. NERC's determination of "elevated" risk generally indicates that there is a "[p]otential for insufficient operating reserves in above-normal conditions." Ex. 41 at 6 (NERC 2025 Summer Reliability Assessment). An "elevated risk" does not justify an emergency declaration because it does not indicate the possibility of imminent shortfalls; indeed, it is only the second of three risk levels offered by NERC. Moreover, achieved Planning Reserve Margins *do generally* meet Reference Margin Levels in "elevated" risk regions. *Id.* at 10, 41. NERC typically provides specific context, assumptions, and details associated with a determination to allow an audience to understand its implication. *See id.* at 16.

***Figure 4**: NERC Seasonal Risk Assessment Levels*

Table 2: Seasonal Risk Assessment Summary

Category	Criteria[1]
High Potential for insufficient operating reserves in normal peak conditions	• Planning Reserve Margins do not meet Reference Margin Levels (RML); or • Probabilistic indices exceed benchmarks, e.g., loss of load hours (LOLH) of 2.4 hours over the season; or • Analysis of the risk hour(s) indicates resources will not be sufficient to meet operating reserves under **normal peak-day demand and outage scenarios**[2]
Elevated Potential for insufficient operating reserves in above-normal conditions	• Probabilistic indices are low but not negligible (e.g., LOLH above 0.1 hours over the season); or • Analysis of the risk hour(s) indicates resources will not be sufficient to meet operating reserves under **extreme peak-day demand with normal resource scenarios** (i.e., typical or expected outage and derate scenarios for conditions);[2] or • Analysis of the risk hour(s) indicates resources will not be sufficient to meet operating reserves under **normal peak-day demand with reduced resources** (i.e., extreme outage and derate scenarios)[3]
Normal Sufficient operating reserves expected	• Probabilistic indices are negligible • Analysis of the risk hour(s) indicates resources will be sufficient to meet operating reserves under normal and extreme peak-day demand and outage scenarios[4]

Table Notes:
[1]The table provides general criteria. Other factors may influence a higher or lower risk assessment.
[2]**Normal resource scenarios** include planned and typical forced outages as well as outages and derates that are closely correlated to the extreme peak demand.
[3]**Reduced resource scenarios** include planned and typical forced outages and low-likelihood resource scenarios, such as extreme low-wind scenarios, low-hydro scenarios during drought years, or high thermal outages when such a scenario is warranted.
[4]Even in normal risk assessment areas, extreme demand and extreme outage scenarios that are not closely linked may indicate risk of operating reserve shortfall.

Source: Ex. 143 at 11 (NERC 2025–2026 Winter Reliability Assessment).

B. The Evidence Shows No Reliability or Resource Adequacy Crisis in MISO for Summer 2026, Fall 2026, or Thereafter.

1. There Is No Evidence of a Resource Adequacy Crisis in the current Summer or upcoming Fall Seasons.

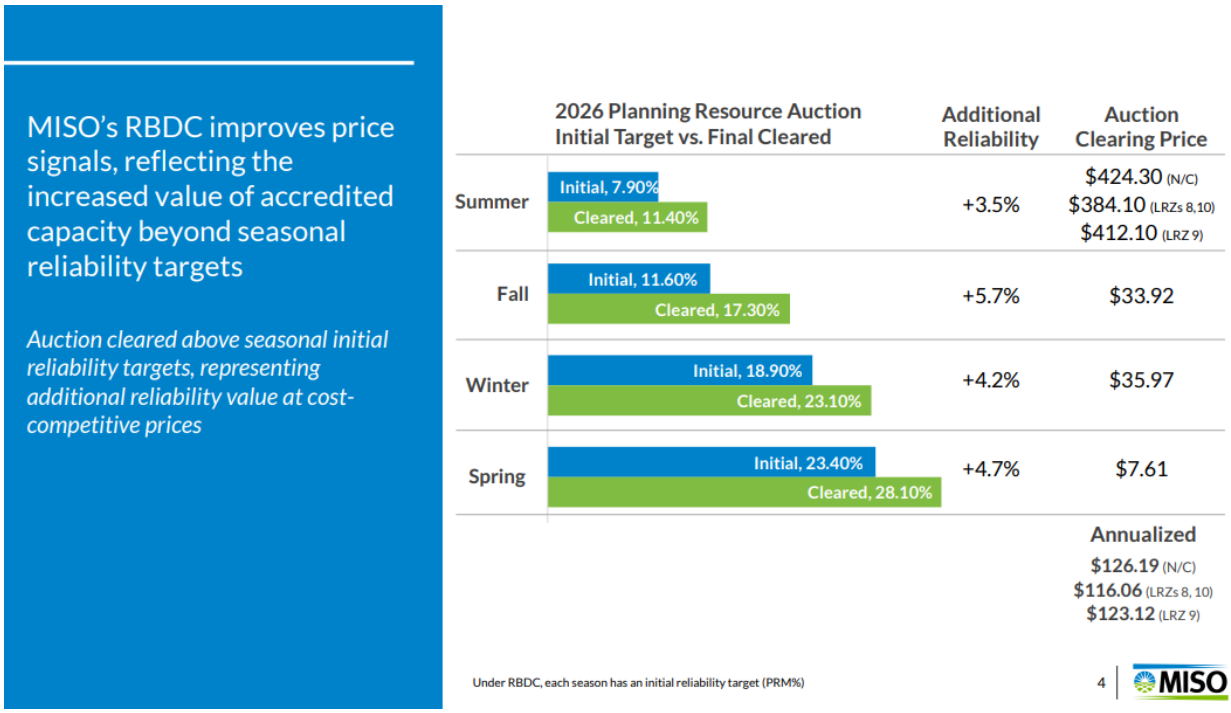
MISO conducted its annual four-season capacity auction (the Planning Auction, discussed above in sec. IV.A.2) as scheduled in the spring of 2026, around two months before the Orders. Ex. 185 at 1 (MISO 2026–27 Auction Results); Ex. 185A at 1 (MISO 2026–27 Auction Results (Original)). The 2026–2027 Planning Auction—which covers the period from June 1, 2026 through May 31, 2027—procured adequate supplies for MISO as a whole, for MISO's North/Central subregion, and for Local Resource Zone 6 (which includes the MISO portion of Indiana[5]) for the Summer 2026 and Fall 2026 seasons covered by the Orders.[6]

MISO's auction results demonstrate continued satisfaction of all resource adequacy goals and even an expanding surplus of supply compared to demand, relative to last year's auction. As in every year, the targeted procurement quantity (the Reserve Margin Requirement) included the forecasted peak system demand plus a Reserve Margin. The auction succeeded in procuring even more capacity supplies than the Reserve Margin Requirement in all four seasons. Ex. 185 at 4 (MISO 2026–27 Auction Results); Ex. 185A at 4 (MISO 2026–27 Auction Results (Original)). In this Summer, for instance, whereas MISO targeted a 7.9% reserve margin (*i.e.*, procuring 107.9% of the resources needed to meet expected demand), the auction cleared 111.4% of the resources needed to meet expected demand. The results are shown below.

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[5] MISO Local Resource Zone 6 includes most of Indiana, including the CenterPoint Indiana and NIPSCO service territories, and a portion of Kentucky. *See* Ex. 75 (MISO Tariff Zonal Map).

[6] MISO defines the Summer season for its Planning Auction as June through August, and defines the Fall season as September through November.



Source: Ex. 185 at 4 (MISO 2026–27 Auction Results).

For Summer 2026, MISO's surplus above the initial reserve margin target is 4.6 GW, larger than the 2.6 GW surplus in Summer 2025. Ex. 185 at 5–6 (MISO 2026–27 Auction Results); Ex. 185A at 5–6 (MISO 2026–27 Auction Results (Original)). Total offers increased by 4.8 GW compared to last year's Summer season. Ex. 185 at 5–6 (MISO 2026–27 Auction Results); Ex. 185A at 5–6 (MISO 2026–27 Auction Results (Original)). The increase in total Summer offers was 3.1 GW for just the North/Central subregion, which includes Indiana. Ex. 185 at 15 (MISO 2026–27 Auction Results); Ex. 185A at 15 (MISO 2026–27 Auction Results (Original)). System-wide supply offers also increased year-on-year in each of Fall, Winter, and Spring. Ex. 185 at 28–30 (MISO 2026–27 Auction Results); Ex. 185A at 28–30 (MISO 2026–27 Auction Results (Original)).

Notably, the 2026–2027 auction did not include Schahfer or Culley 2 as capacity resources for the Summer 2026 or Fall 2026 seasons. Ex. 196 at PDF p. 4 (NIPSCO 2026 Planning Reserve Margin Report); Ex. 197 at PDF p. 5 (CenterPoint 2026 Planning Reserve Margin Repot). For the Summer 2026 period, cleared offers from Zone 6 totaled 16,753.8 megawatts, which exceeded the Zone 6 Local Clearing Requirement by almost 10 percent. The Planning Auction calculated that surplus capacity from other areas of MISO could provide adequate imports—2,738.2 megawatts—towards meeting Zone 6's Reserve Margin Requirement for Summer. Ex. 185 at 23 (MISO 2026–2027 Auction Results);Ex. 185A at 23 (MISO 2026–27 Auction Results (Original)). For Fall 2026, cleared offers from Zone 6 totaled 14,432.1 megawatts, exceeding the zone's Local Clearing Requirement by over 7

percent; and the Planning Auction calculated that Zone 6 could absorb imports of nearly 3,900 megawatts for the Fall season. Ex. 185 at 24 (MISO 2026–27 Auction Results); Ex. 185A at 24 (MISO 2026–27 Auction Results (Original)). In addition to Zone 6 fully meeting its capacity requirements, every other Local Resource Zone in MISO successfully met its capacity requirements within the 2026–2027 Planning Auction, resulting in MISO finding that there were no capacity deficits in the region during the planning year. *See* Ex. 185 at 2 (MISO 2026–27 Auction Results) ("For the 2026 Planning Resource Auction (PRA), all zones show sufficient resources at the regional, subregional and zonal levels to meet resource adequacy requirements across all four seasons"); Ex. 185A at 2 (MISO 2026–27 Auction Results (Original)) (same).

Moreover, NERC's 2026 Summer Reliability Assessment finds that MISO is at normal risk this summer. Ex. 180 at 3 (NERC 2026 Summer Reliability Assessment). NERC is clear that "[e]xpected resources meet operating reserve requirements for assessed scenarios" and according to NERC, even "[a]bove-normal summer peak load combined with low resource conditions" only "*could* result in the need to employ operating mitigations (e.g., load-modifying resources) and EEAs." *Id.* at 16 (emphasis added).

Despite all this positive news for resource adequacy, the Department inexplicably ignored it all in its Orders, citing instead the 2025–2026 Planning Auction results, which covered a period ending in May 2026, pre-dating the period covered by the Orders.

Additionally, MISO is not projecting any possibility of a regional resource adequacy shortfall through May 2027. MISO's joint annual survey with the Organization of MISO States ("OMS"), which forecasts generation capacity supply and system load (the "OMS-MISO Survey"), evaluates a range of potential outcomes years into the future, using a set of assumptions ranging from extremely conservative to a match of utility projections. *See supra* sec. IV.A.2. This year's survey results, published in June 2026, are based on 99.5% participation from MISO resource owners. Ex. 186 at 2 (OMS-MISO 2026 Survey). For the next five years, the survey shows that "Load Serving Entities are expected to have adequate resources to meet load reserve requirements in each zone." *Id.* at 3. For the Summer season, MISO members project average annual resource additions of 15 gigawatts, including 11.0 gigawatts before considering the ERAS program and 4.0 annual new gigawatts through ERAS. *Id.* at 5. This stands in contrast to last year's OMS-MISO survey, which showed an "Emerging Projection" based on member responses of 8.6 GW of additions per year — which necessarily excluded considerations of ERAS because FERC had not yet approved that program when the survey results were reported. Regardless of load forecasting method, and regardless of capacity

accreditation method, the survey's projections show that forecasted available resources will exceed demand in each Summer and Winter season of 2027–2028 through 2031–2032. *Id.* at 8, 12, 13.

As required by Indiana law, both NIPSCO and CenterPoint Indiana completed their triennial IRP analysis within the past sixteen months: NIPSCO in December 2024 and CenterPoint Indiana in December 2025. Exs. 100A–100C (NIPSCO 2024 IRP); Ex. 21 (CenterPoint Indiana 2025 IRP). NIPSCO's 2024 IRP assumed that Schahfer Units 17 and 18 would retire at the end of 2025, with reliability maintained through previously approved transmission upgrades and approximately 2,100 MW of replacement resources (renewables plus a new 400-MW gas peaker) entering service. Ex. 100A at 6–7 (NIPSCO 2024 IRP, part 1); Ex. 3 at 3–4 (EFG Report). NIPSCO's resource planning analysis indicated no sign of a Summer reliability shortfall in 2026, and the retirement of Schahfer would not create a capacity deficiency under the current rules. Ex. 100A at 26 (NIPSCO 2024 IRP, part 1); Ex. 3 at 4–5 (EFG Report). NIPSCO's analysis also showed that for the Summer 2026 season, total accredited capacity is well above the Planning Reserve Margin. Ex. 100A at 26 (NIPSCO 2024 IRP, part 1); Ex. 3 at 5–6 (EFG Report). Thus, the IRP record supports the conclusion that continued operation of Schahfer 17 and 18 is not required for resource adequacy in 2026. Ex. 3 at 5–6 (EFG Report). NIPSCO also submitted a Planning Reserve Margin Annual Report to the Indiana Commission this year to demonstrate how it meets the 85% threshold for each season of 2026–2027 and the next two planning years pursuant to Ind. Code § 8-1-8.5-13(*l*), as discussed *supra* in section IV.A.4. Ex. 11 at 3–6 (NIPSCO Planning Reserve Margin 2025 Report).

Similarly, CenterPoint Indiana's most recent IRP, filed late last year, assumes Culley Unit 2 would retire at the end of 2025 as part of its Reference Case. Ex. 21 at 151 (CenterPoint Indiana 2025 IRP). CenterPoint Indiana's analysis and projections show no capacity shortage in Summer 2026 or in subsequent years. *Id.* at 152; Ex. 3 at 3 (EFG Report). Specifically, for the Summer 2026 season, CenterPoint Indiana projected a capacity surplus of 58 MW relative to its Planning Reserve Margin. *Id.* Additionally, CenterPoint Indiana submitted its Planning Reserve Margin Annual Report to the Indiana Commission in May 2026, again pursuant to Ind. Code § 8-1-8.5-13(*l*). The report showed that CenterPoint Indiana more than meets its minimum 85% requirement of owned or contracted resources, with 107% of the utility's allocated Reserve Margin Requirement for Summer 2026 and 129% for Fall 2026 owned or contracted for. Ex. 197 at PDF p. 5 (CenterPoint 2026 Planning Reserve Margin Report).

2. There Is No Evidence of a Resource Adequacy Crisis After Fall 2026.

The MISO system is also positioned to operate reliably for years beyond the 90-day timeframe of the Orders. There is ample evidence demonstrating that this is true for the remainder of the 2026–2027 planning year; for the next couple years after that; and even out through the 2030 time horizon that the Department identifies as a long-term source of concern.

First and most directly, MISO has secured the stability of its grid through at least the end of May 2027 by operation of its 2026–2027 Planning Auction. The auction secures in April of each year the resources necessary to ensure grid reliability individually for each of the four subsequent seasons. *See supra* sec. IV.A.2.ii. The 2026–2027 Planning Auction exceeded its target Reserve Margin Requirements for the Winter season by 4.2%, meaning that (as it did for the Summer and Fall seasons) MISO will enter the Winter season with *more* resources than its own analysis has indicated are actually needed to ensure grid reliability. Ex. 185 at 4 (MISO 2026–27 Auction Results); Ex. 185A at 4 (MISO 2026–27 Auction Results (Original)). Furthermore, MISO's modeling in conjunction with its shift to a seasonal resource adequacy construct indicated that the loss of load risk in Winter 2026–2027 (as with Summer 2026 and Fall 2026) is very low. Ex. 81 at 49:15–17 (Joundi Testimony); *see also* Ex. 82 at 33 (MISO 2024–25 LOLE Study Report); Ex. 83 at 34 (MISO 2025–26 LOLE Study Report). Thus, there is no basis for any resource adequacy concern for the Spring season.

Second, the 2026 OMS-MISO Survey, discussed in *supra* section IV.B.1, includes projections for Summer and Winter of Planning Year 2027–2028 showing a surplus of over 10 GWs in those seasons. Ex. 186 at 8 (2026 OMS-MISO Survey). In other words, the survey provides no basis for any concern about MISO's ability to meet resource adequacy needs through at least May 2027. And a series of unlikely events would have to occur for the region to see even a minor (1–2 GW) deficit through May 2028, as further explained below. MISO's system is robust, and even before its new approach to generator interconnection (also discussed below), it was on track as of early June 2025 to ensure that its grid remains robust for approximately the next three years.

The evidence also confirms sufficient resources in the months and years after Fall 2026 in the utility territories of both NIPSCO and CenterPoint Indiana, where the subject generating Plants are located. CenterPoint Indiana's Planning Reserve Margin Report submitted to the Indiana Commission this year shows that it has secured accredited resources totaling over 100% of its allocated Reserve Margin Requirement in <u>each</u> season of planning year 2026–2027 and 2027–2028. Ex. 197 at PDF pp. 5–6 (CenterPoint 2026 Planning Reserve Margin Report). And NIPSCO's

IRP "indicates no sign of a summer reliability shortfall in . . . 2027 [in addition to 2026]." Ex. 3 at 5 (EFG Report).

To the extent there are capacity gaps shown in the NIPSCO and CenterPoint Indiana IRPs in years 2028 and beyond, such gaps are not *predictions* of the shortage of capacity needed to meet demand. Rather, consistent with the planning purpose of IRPs, both NIPSCO and CenterPoint Indiana's IRPs calculate the amount of accredited capacity needed to meet demand, plus, maintain a Reserve Margin as determined by MISO. Ex. 21 at 81 (CenterPoint Indiana 2025 IRP); Ex. 100A at 24 (NIPSCO 2024 IRP, part 1). Any "surplus" or "shortfall" shows whether the utility has more or fewer resources than are needed to achieve MISO's Reserve Margin given expected future load and utility-owned generation and capacity purchases.

For Summer 2028 and Summer 2029, CenterPoint Indiana shows a capacity shortfall of 115 MW and 114 MW respectively. Ex. 21 at 152 (CenterPoint Indiana 2025 IRP). NIPSCO shows a shortfall starting in Summer 2028. Ex. 100A at 26 (NIPSCO 2024 IRP, part 1). But these projected capacity deficits are not a basis on which to declare an imminent shortfall or an emergency. They are a planning signal to guide medium- and long-term utility planning. And they are being treated as such by CenterPoint Indiana and NIPSCO. CenterPoint Indiana does not have a projected shortfall in 2028 because it is unable to procure or interconnect enough capacity. Rather, the utility has not decided on whether to purchase capacity from the MISO market or construct a battery using Culley 2's interconnection rights and is conducting an RFP to see which would be more cost-effective for its customers. *See* Ex. 21 at 190 (CenterPoint Indiana 2025 IRP); Ex. 3 at 3 (EFG Report). Likewise, NIPSCO's existing capacity projection showing a shortfall starting in 2028 should be understood as a "foundational starting point" upon which "NIPSCO developed six different portfolio concepts around accreditation and emission intensity through least cost portfolio optimization analysis." Ex. 100A at 26 (NIPSCO 2024 IRP, part 1); s*ee also* Ex. 100A at 1 (describing NIPSCO's selected solution of "add[ing] between 900 and 1,150 MW of new storage capacity and 350 MW of short-term thermal PPAs by 2028–2029. . . . NIPSCO will continue to track accreditation trends as the rule is implemented and adjust its storage procurement plan accordingly.") (NIPSCO 2024 IRP). The capacity supply-demand balance graphs in NIPSCO's IRP "are NIPSCO's going-in position to its 2024 IRP (including existing and planned resources) and do not contemplate unidentified, additional resources that NIPSCO would plan to acquire as a result of its IRP to fill gaps in need in 2028 and beyond." Ex. 3 at 5 (EFG Report) (referring to Ex. 100A at 26 (NIPSCO 2024 IRP, part 1)).

Third, although MISO has spoken publicly about its long-term resource adequacy concerns heading into Summer 2028 and beyond, those concerns can be addressed through traditional, non-emergency, policy measures and other strategies to ensure no shortfall actually occurs. And MISO is not standing still in this regard; as MISO has explained,

> "State regulators along with utilities have the responsibility of ensuring resource adequacy. MISO remains focused on reliably operating the grid using the resources our members provide, while working closely with stakeholders and regulatory partners, providing visibility into system needs and sending market signals to inform long-term resource planning."

Ex. 117 at PDF p. 4 (RTO Insider Article).

Generally speaking, from FERC down to stakeholders, everyone working regularly in the energy regulatory world recognizes that the industry is dynamic, and everyone is engaging to ensure there are adequate resources going forward. At the end of May 2025, FERC hosted a technical conference where MISO, the MISO Independent Market Monitor, and other contributors highlighted that the system is in good shape today, and outlined plans to ensure that remains the case down the road. *See, e.g.*, Ex. 35 at 1 (Patton MISO Comments) ("The resource adequacy challenges and risks in MISO are not nearly daunting as portrayed by MISO planning reports or the NERC 2024 Long-Term Reliability Assessment."); *see also* Ex. 62 at 13 (FERC Technical Conference Notice).

In fact, MISO has already taken tangible steps to address what it perceived to be a potential for resource adequacy shortfalls down the road: it developed, and secured FERC approval for, an Expedited Resource Addition Study (ERAS) pathway for generator interconnection. *See generally* Ex. 90 (MISO ERAS Transmittal Letter); Ex. 91 at P 1 (MISO ERAS Decision). The ERAS proceeding demonstrates that in response to somewhat conjectural resource adequacy shortfall projections, MISO launched an entirely new interconnection process that is currently underway. ERAS has already accepted, in its first four cycles, nearly fifty projects totaling nearly 28,000 megawatts of new capacity, most of which will be provided by gas plants. *See* Ex. 181 (MISO ERAS Cycle 4 Release); Ex. 172 at 1–3 (ERAS Interconnection Requests). *See also* Ex. 48 at PDF p. 2 (Utility Dive, MISO begins reviewing 6.1 GW — 70% of it gas — in fast-track interconnection study). These projects will receive fast-tracked interconnection studies, with projected in-service dates no later than three years from now. Of the first forty projects in the program, accepted in September and December of last year together with March of this year, twenty-five projects representing around 11 gigawatts of proposed capacity have already executed interconnection agreements and an additional

fifteen (representing 8 gigawatts) are expected to soon complete agreements. Ex. 181 (MISO ERAS Cycle 4 Release).

Nor has Winter Storm Fern called into question MISO's resource adequacy—during possible future extreme winter conditions or in any other season. During the tightest operational hour of Fern on January 24, 2026, MISO had access to at least 5,070 MW more generation than was needed to meet MISO's peak load plus operating reserve requirements. Ex. 173 at 5 (Konidena April Declaration); *id.* at 4 (explaining why the calculated numbers represent a "conservative" "floor on the potential amount of resources available to MISO"). Meanwhile, Schahfer Unit 17 and Culley Unit 2 together provided no more than 425 MW of power during each hour of January 24, 2026 (and Schahfer Unit 18 provided nothing). Ex. 201 at 1-2, 9-12 (January 2026 EPA CAMPD Data). As such, even at the tightest hour of the tightest day during Winter Storm Fern MISO had access to almost 12 times the amount of unused excess supply as Schahfer and Culley were providing (5,070 ÷425 ≈11.93). The Department thus provides no basis for its statements in the Orders that Winter Storm Fern "demonstrated" "MISO's resource adequacy concerns." Ex. 191 at 4[7] (June Schahfer Order); Ex. 192 at 3 (June Culley Order). *See generally* Ex. 173 at 8 (Konidena April Declaration). And the record does not support that the Plants would have been able to solve any resource adequacy concerns during Winter Storm Fern even if there were not enough capacity. For instance, as CenterPoint Indiana noted, Culley's "performance during the recent MISO cold weather event underscores a pattern of unreliability of [Culley Unit 2]," and Culley was forced offline for at least one day during Fern. Ex. 169 at 2 (CenterPoint Letter to USDOE). Rather, the record shows that MISO did not need the capacity provided by plants subject to 202(c) orders during even the most extreme hours of Fern.

Indeed, while in the throes of Winter Storm Fern, MISO assured FERC on January 26, 2026 that "existing processes have cleared sufficient electric generating capacity across MISO for the periods of time covered by the Order." Ex. 181 at 2 (MISO January Filing). Additionally, while the Department apparently received twenty different requests from utilities and transmission grid operators for Section 202(c) orders during Winter Storm Fern, MISO apparently did not submit any such application, and the Department issued no order during that time period directed to MISO. Ex. 182 (2026 DOE 202(c) Orders Webpage). There is no evidence that pre-

[7] The June Schahfer Order labels the first page as Page "2" and continues pagination from there; PIOs are following this pagination for citations in this document.

existing orders under Section 202(c) were needed to meet MISO's resource need during this Winter Storm Fern time period. And MISO's monthly Operations Report stated that "[r]eliability, markets[,] and operational functions performed as expected in January." Ex. 183 at 2 (MISO January Operations Report).

C. Schahfer and Culley Should Retire As Soon As Possible.

1. Schahfer and Culley Were Built Four to Six Decades Ago.

i. Schahfer Units 17 and 18 Are Electric Generating Units in Indiana Originally Built in the Mid-1980s.

The R.M. Schahfer Generating Station is a coal and gas-burning power plant in Wheatfield, Indiana, owned and operated by NIPSCO, the retail electric utility that serves portions of northwest Indiana. Four coal-burning units were commissioned at the Schahfer site between 1976 and 1986: Units 14, 15, 17, and 18. Coal is delivered to Schahfer by rail. Two smaller gas combustion turbines, Units 16A and 16B, were commissioned in 1979. The Indiana Commission has approved NIPSCO's plan to install new combustion turbine gas units at the site upon the retirement of Units 17 and 18, using the retiring units' interconnection rights. *See* Ex. 20 (IURC Schahfer Gas Plant Order); Ex. 132 (NIPSCO Rate Case Discovery Responses).

NIPSCO is a member of MISO and offers the output of the Schahfer coal units in the MISO energy markets. In its 2018 IRP, NIPSCO determined that retiring and replacing all four Schahfer units would reduce costs for its customers. Ex. 71 at 6-7 (NIPSCO 2018 IRP). The two largest of the four original Schafer units were retired in 2021. Ex. 72A at 9 (NIPSCO 2021 IRP, part 1). The remaining Schahfer coal units, Units 17 and 18, were slated to retire in December 2025. Ex. 102 (MISO Attachment Y Response to NIPSCO).

The Schahfer coal units are no longer competitive in the MISO energy market and have exhibited a long-term decline in generation over the last two decades. *See infra* sec. IV.C.3. Due to their lack of economic competitiveness, NIPSCO has planned and executed a decade-long process to replace these aging coal units with modern generation units.

ii. Culley Unit 2 Is an Electric Generating Unit in Indiana Built in 1966.

The F.B. Culley Generating Station is a coal-burning power plant located in Warrick County, Indiana, near Newburgh. It is owned and operated by CenterPoint Energy Indiana South (formerly Southern Indiana Gas & Electric Company) and sits on the north bank of the Ohio River. CenterPoint Energy Indiana South is the retail electric utility that serves southwest Indiana. Three coal-burning units were

built at the Culley facility between 1955 and 1973: Units 1, 2, and 3. Unit 1 has retired.

2. The Owners of Schahfer and Culley 2 Are Investor-Owned Utilities Subject to Extensive Regulation.

i. R.M. Schahfer Generating Station Is Owned by Northern Indiana Public Service Company LLC.

NIPSCO has owned the Schahfer plant since it was built in the 1980s. NIPSCO is a subsidiary of NiSource Inc., a publicly traded corporation based in Indiana with subsidiary utilities in five other states. Ex. 78 at 15, 19, 23 (NiSource 2024 Annual Report). NIPSCO qualifies as a "public utility" under Indiana law, rendering it subject to extensive regulation of its operations by the Indiana Commission: *see, e.g.,* Ind. Code § 8-1-2-1(a), ch. 8-1-2, ch. 8-1-8.5. NIPSCO owns several generating plants in Indiana, including the Michigan City Unit 12 coal generating plant with a capacity of 455 megawatts, the Sugar Creek Generating Station combined-cycle gas plant with a capacity of 563 megawatts, and numerous wind and solar generating facilities around the state of Indiana (plus one solar facility in Kentucky). Ex. 100A at 7 (NIPSCO 2024 IRP, part 1). NIPSCO is also constructing a 400 MW gas combustion turbine facility at the site of Schahfer Units 17 and 18, as discussed below in section IV.C.4.i. NIPSCO is subject to the Indiana Commission's triennial integrated resource planning requirement and submitted its most-recent IRP to the Indiana Commission in December 2024. 170 IAC 4-7-2(a)(3)(C); Exs. 100A–100C (NIPSCO 2024 IRP).

ii. Culley Unit 2 Is Owned by CenterPoint Energy Indiana South.

The F.B. Culley Generating Station is owned by CenterPoint Energy Indiana South (CenterPoint Indiana), which is a subsidiary of CenterPoint Energy, Inc., a publicly traded corporation based in Houston, Texas with subsidiary electric and gas utilities in four states including Indiana. Ex. 79 at 19-20 (CenterPoint 2024 Annual Report). Like NIPSCO, CenterPoint Indiana qualifies as a "public utility" under Indiana Code § 8-1-2-1, rendering it subject to the state's comprehensive utility regulatory scheme. CenterPoint Indiana owns or controls several generating assets in Indiana, including the two Culley coal units totaling 360 MW; gas turbines totaling 620 MW at A.B. Brown; and hundreds of megawatts worth of owned or contracted wind and solar generating assets. Ex. 80 at 13 (CenterPoint 2025 IRP Summary). Culley Unit 2 is the only CenterPoint Indiana coal unit that lacks post-

combustion pollution controls for nitrogen oxides. Ex. 115 at 162-163 (Vectren[8] 2020 IRP). CenterPoint Indiana is also subject to the Indiana Commission's triennial integrated resource planning requirement and submitted its most-recent IRP to the Indiana Commission in December 2025. 170 IAC 4-7-2(a)(3)(C); Ex. 21 (CenterPoint Indiana 2025 IRP).

3. Schahfer and Culley 2 Are Old, Unreliable, Inflexible, Dirty, and Expensive.

i. Schahfer Exemplifies these Unwanted Attributes.

a. Schahfer Is Old and Unreliable.

Schahfer Units 17 and 18 are 43 and 40 years old, respectively, beyond the typical economic design life of 40 years for a coal unit, and approaching the end of the typical operational life of coal units (40 to 50 years). Ex. 4 at 7 (Powers January Decl.) (citing Ex. 63 (Palgrave Handbook) and Ex. 64 (IEA Report)). Both units have experienced long and recurrent outages in recent years that reflect aged, worn components that are expensive and may be difficult to repair or replace. *Id.* at 7–8; Ex. 132 at PDF p. 16 (NIPSCO Rate Case Discovery Responses) ("NIPSCO calculates that operating Schahfer Units 17 and 18 beyond 2025 would require more than $1 billion of additional investment through 2027."). In the tables below, and with further context in his declaration, PIOs' expert engineer Bill Powers identifies the duration and reasons for the units' longest outages in 2023 and 2024 based on NIPSCO's filings with the Indiana Commission. Ex. 4 at 7–8 (Powers January Decl.). For reference, there are 8,760 hours in a year.

Longest 2025 Outages by Type

Unit	Outage Description	Total Duration (hours)
17	• Boiler tube leaks (5 outages) • Water level alarm	1,044 74
18	• Boiler tube leak (1 outage) • Steam turbine bearing vibration / failure • High turbine bearing vibration	150 4,205 1,996

The numbers above are rounded to the nearest hour.

[8] CenterPoint Energy Indiana South was formerly known by the trade name Vectren South or Vectren.

Longest 2024 Outages by Type

Unit	Outage Description	Total Duration (hours)
17	• Boiler tube leaks (2 outages)	1,645
18	• ESP problems (1 outage) • Boiler tube leaks (3 outages) • Pulverizer mill trip, extensive damage	147 159 614

The numbers above are rounded to the nearest hour.

Ex. 4 at 6 (Powers January Declaration) (citing NIPSCO public filings including Exs. 14–16 (Saffran Q1, Q2, Q3 2025 Outage Testimony)); Ex. 174 at 7 (Saffran Q4 2025 Outage Testimony).

These outages demonstrate Schahfer's increasing inability to consistently perform even under normal conditions, let alone to meet an emergency. Both units have been unexpectedly unable to produce power during significant portions of recent years. This unexpected downtime is known as a "forced outage" with the "forced outage rate" being the percent of hours in which a unit was in forced outage. The Schahfer units experienced the following forced outage rates over the past two years, which were well above the national coal unit forced outage average rate of 12.0%.

Unit	Forced Outage Rate	
	2024	2025*
17	18.8%	15.9%
18	13.2%	78.2%

* *through September*

Ex. 4 at 5 (citing NIPSCO public filings including Exs. 14–16 (Saffran Q1, Q2, Q3 2025 Outage Testimony)). Mr. Powers, drawing on his experience of over 40 years in the fields of power plant operations and environmental engineering, opined that these high outage rates "reflect[] the impact of worn and difficult-to-repair or replace coal unit components on operational reliability" and "point to degraded Schahfer 17 and 18 reliability [that] will degrade further if the units are required to run for extended periods of time, are required to stop and start numerous times, or

attempt to start up at an accelerated rate in response to extreme demand conditions." Ex. 4 at 1, 6–7 (Powers January Decl.). Mr. Powers noted that the jump in the forced outage rate in 2025 was "likely exacerbated" by underspending on operating and maintenance ("O&M") and capital outlays as the Schahfer units reached their expected end of life. *Id.* at 8. He described how elements of the Schahfer units' air emissions control system—including electrostatic precipitators, the wet limestone scrubber, and ultra-low NO_x burners—need regular maintenance to stave off degradation. *Id.* at 19. He further opined, "It cannot be assumed that the Schahfer 17 and 18 pollution control equipment is in good working order and will operate reliably to control the facility's emissions beyond December 2025." *Id.*

And in 2026, as discussed *infra* in sec. V.B.2, Unit 18 has been completely unavailable all year due to needed repairs, while Unit 17 has been in a planned outage since late February. The unavailability of both units is expected to last through late September. Ex. 194 (IURC 2026 Summer Reliability Forum (May 19, 2026); Ex. 195 at 12 (NIPSCO Summer 2026 Reliability Presentation).

b. Schahfer Is Inflexible.

In addition to its reliability problems outlined above, the Schahfer plant also takes significant time to start up from a cold condition, as shown in the following table:

Unit 17	Unit 18
23 hours	23 hours

Ex. 4 at 10 (Powers January Decl.) (citing Ex. 19, NIPSCO CPCN Discovery Responses). These startup times are very long, even for coal units. *See* Ex. 118 at PDF p. 3 (RMI Analysis of Coal Plants' Threats to Reliability) (stating that the average coal plant takes 12 hours to reach max capacity from a cold start); Ex. 55 at 26 (IEA Flexibility Report) (similar). Even if Schahfer could provide power reliably—and it cannot—the units' long start times mean the plant is ill-suited to provide peaking power during periods of high demand—precisely the periods the June Schahfer Order appears intended to address. A peak demand event may not become apparent to system operators at MISO until just a few hours before the actual peak. Ex. 4 at 10-11 (Powers January Declaration) (citing Ex. 85 (MISO Attributes Roadmap)). Moreover, bringing the Schahfer units from a cold start condition to full output to meet extreme demand would cost around $300,000 each time. *Id.* at 11 (citing Ex. 54 at 16 (NARUC Coal Report)). The alternative to incurring those costs would be the costly approach of running the units on a "Must Run" or "Self-Scheduled" basis. *Id.*

c. Schahfer Is Dirty.

Schahfer has been a significant source of pollution. Each year when operating, the plant emitted hundreds of thousands of pounds of air toxics, hundreds of thousands of pounds of particulate matter ("PM"), many millions of pounds of nitrogen oxides and sulfur dioxide, and billions of pounds of carbon dioxide. *See* U.S. Envtl. Prot. Agency ("EPA"), ECHO, https://echo.epa.gov/air-pollutant-report?fid=110000493706 (last visited Jul. 6, 2026). In 2024, the plant discharged over 28 million pounds of pollution into nearby water bodies, including the Kankakee River, including 23,000 pounds of toxic metals. EPA, ECHO, https://echo.epa.gov/detailed-facility-report?fid=110000493706 (last visited Jul. 6, 2026). PIOs' expert engineer, Mr. Powers, calculated that if Schahfer 17 and 18 operated during the 90-day period of the December Schahfer Order with the same level of production they maintained in January-March 2025, more than 140,000 pounds of SO_2, 675,000 pounds of NO_x, 535,000 tons of CO_2, and 104,000 pounds of PM would be emitted. (As Mr. Powers noted, that analysis ignores that Unit 18 actually needed—and still needs—extensive repairs to become operable, as discussed *infra* in sec. V.B.2.) Ex. 4 at 14-15 (Powers January Decl.).

Emissions from Schahfer have serious health harms. EPA's Co-Benefits Risk Assessment ("COBRA") tool demonstrates that retiring Schahfer would reduce nationwide mortality by 9.4 to 16 deaths per year due to reductions in $PM_{2.5}$, SO_2, and NO_x emissions. Ex. 154 at PDF p. 5 (EPA COBRA Schahfer Retirement Analysis).[9]

Additionally, burning coal at Schahfer creates toxic coal ash. The plant already holds roughly 1 million cubic yards of coal ash in an on-site impoundment. Ex. 88 at 2 (Schahfer Waste Disposal Area Closure Plan). Groundwater monitoring at Schahfer's Waste Disposal Area has consistently, over several years, shown statistically significant levels (above background concentrations) of lithium, molybdenum, and arsenic at downgradient groundwater monitoring wells. Ex. 147 at 5-7 (Schahfer 2024 Groundwater Monitoring Report). At Schahfer's Restricted Waste Site Type I landfill, the September 2025 groundwater monitoring event also showed statistically significant exceedances above background levels for lithium,

[9] PIOs obtained this analysis in the public COBRA portal by entering the annual Schahfer emissions of $PM_{2.5}$, SO_x, and NO_x, based on data from EPA's CAMPD database, as reductions from the Jasper County and Porter County (Indiana) "Fuel Combustion: Industrial" source.

molybdenum, and arsenic at downgradient monitoring wells. Ex. 184A at 6 (Schahfer Landfill 2025 Groundwater Monitoring Report, part 1).

d. Schahfer Is Expensive.

Schahfer costs significantly more money to run than it can earn in the market. If Units 17 and 18 run at their average capacity factor from 2020 through 2025 (and ignoring for purposes of analysis the fact that both Units will be inoperable for the whole duration of the June Schahfer Order), they are expected to lose $9.8 million and $8.9 million, respectively, during the 90-day term of the Order. Ex. 5 at 6 (Synapse Report).[10]

Schahfer has gotten even more expensive to run since 2021. In 2024, the cost of Schahfer's power rose to $80.93 per MWh, a 66% increase over the 2021 cost. Ex. 49 at PDF p. 2 (2025 Energy Innovation Dataset). This means the cost of Schahfer's power grew significantly faster than inflation (roughly 16%) over the same period. Ex. 50 at 3 (2025 Energy Innovation Coal Cost Report); *see also* Ex. 51 at 12-13 (2023 Energy Innovation Coal Cost Report) (describing the same methodology used in the 2025 report).

ii. Culley Unit 2 Exemplifies These Unwanted Attributes.

a. Culley 2 Is Old and Unreliable.

Culley 2, at sixty years old, is at least ten years beyond the typical operational life of coal units. Ex. 4 at 9 (Powers January Declaration). CenterPoint Indiana has stated that Culley 2 has "run past its useful life" as the basis for its planned retirement in 2025. Ex. 80 at 30 (CenterPoint Indiana 2025 IRP Summary). In the table below, and with further context in his declaration, PIOs' expert engineer Bill Powers identifies how Culley 2's forced outage rate has steadily increased over the past half-decade, based on CenterPoint Indiana's filings with the Indiana Commission.

[10] The Synapse Report calculated revenues and costs on an annualized basis and then calculated three months' worth. *See* Exhibit 5 at *passim*.

Culley 2 Forced Outage Rate, 2020-2024

Unit	2020	2021	2022	2023	2024
Culley 2	6.3%	21.9%	26.6%	24.8%	32.4%

Ex. 4 at 8 (Powers January Decl.) (citing Ex. 22, CenterPoint 2024 Performance Report). Mr. Powers states that this data "points to degraded Culley 2 reliability." Ex. 4 at 8–9 (Powers January Decl.). Mr. Powers further highlighted CenterPoint's public disclosure that its maintenance expenditure declined about 20% from 2022 to 2023 in account 512 (Maintenance of Boiler Plant). *Id.* at 9 (citing Ex. 152, CenterPoint Rate Case Discovery Responses). Mr. Powers noted that increased maintenance spending (missing recently at Culley 2) "is necessary to minimize the effect of equipment degradation with age and changing operating regimes." *Id.* at 9.

Over approximately the first six months of 2026, covering the periods of the December Culley Order and the March Culley Order, Culley 2 experienced five forced outages across thirteen days of January, February, March, and May. This included eight days in the second half of January, as Winter Storm Fern was tearing through the Midwest. Ex. 200 at 2 (CenterPoint Culley Discovery Response).

b. Culley 2 Is Inflexible.

To gauge the startup time of Culley 2, it is instructive to consider the startup time for another coal generating plant formerly within CenterPoint Indiana's portfolio. The A.B. Brown coal units required 18 to 24 hours for a cold start. Ex. 153 at 30 (Wayne Games 2018 Testimony). And Culley 2 is over a decade older than the two A.B. Brown units. *Id.* at 13. As noted above in section IV.C.3.i.b, the startup time of an average coal unit is 12 hours. A cold start time in this range renders Culley 2 unhelpful for responding in real time to emergency conditions. PIOs' expert Mr. Powers opined that like Schahfer, "Culley 2 would not be able to meet a previously unanticipated exceptional MISO peak demand unless it was already online." Ex. 4 at 12 (Powers January Decl.). A cold start of Culley 2 would also cost approximately $37,000 each time; and the cost of running Culley 2 on "Must Run" or "Self Scheduled" commitment status to avoid cold starts solely to be prepared for a potential demand peak would be higher. *Id.* at 12.

c. Culley 2 Is Dirty.

Culley 2 has been a significant source of pollution. Each year when operating, the plant emitted tens of thousands of pounds of air toxics, hundreds of thousands of pounds of particulate matter, millions of pounds of nitrogen oxides and sulfur

dioxide, and billions of pounds of carbon dioxide. *See* EPA, ECHO, https://echo.epa.gov/air-pollutant-report?fid=110000403723 (last visited Jul. 6, 2026). In 2024, the plant discharged approximately 92.5 million pounds of pollution into the Ohio River, including nearly 2,000 pounds of toxic metals. EPA, ECHO, https://echo.epa.gov/detailed-facility-report?fid=110000403723 (last visited Jul. 6, 2026). In 2024, under the National Emissions Standards for Hazardous Air Pollutants, EPA initiated an administrative penalty action against CenterPoint Indiana for alleged exceedance of Culley 2's 30-boiler-operating-day rolling average emissions limit for mercury. Allegedly, the exceedance began when Unit 3 experienced a catastrophic boiler feed pump turbine failure in June 2022 and remained out of service through mid-March 2023. CenterPoint Indiana agreed to a Consent Agreement and Final Order involving payment of an $81,500 civil penalty. EPA, ECHO, Civil Enforcement Case Report (Docket No. CAA-05-2024-0031), https://echo.epa.gov/enforcement-case-report?activity_id=3603947405.

PIOs' expert engineer, Mr. Powers, calculated that if Culley 2 operated during the 90-day period of the December Culley Order with the same level of production it maintained in January–March 2025, more than 113,000 pounds of SO_2, 160,000 pounds of NO_x, 60,000 tons of CO_2, and 153,000 pounds of PM would be emitted. Ex. 4 at 16–17 (Powers January Decl.). The COBRA tool demonstrates that retiring Culley 2 would reduce nationwide mortality by 2.5 to 3.9 deaths per year due to reductions in $PM_{2.5}$, SO_2, and NO_x emissions. Ex. 155 at PDF p. 5 (EPA COBRA Culley Retirement Analysis).[11]

Additionally, burning coal at Culley 2 creates toxic coal ash. The plant already holds roughly 350,000 cubic yards of coal ash in the on-site East Ash Pond, which receives bottom ash sluice water and FGD wastewater from Unit 2. Ex. 98 at 2-2 (Culley East Ash Pond Closure Plan); Ex. 109 at 4-1–4-2 (Culley East Ash Pond Extension Demonstration). Groundwater monitoring data around Culley's East Ash Pond show that releases of the toxic pollutant molybdenum exceed federally set safety levels. Ex. 148 at 2, 4, 7 (Culley 2024 Groundwater Monitoring Report).

d. Culley 2 Is Expensive.

Culley 2 costs significantly more money to run than it can earn in the market. CenterPoint Indiana Vice President of Power Supply Wayne Games testified in

[11] PIOs obtained this analysis in the public COBRA portal by entering the annual Culley 2 emissions of $PM_{2.5}$, SO_x, and NO_x, based on data from EPA's CAMPD database, as reductions from the Warrick County (Indiana) Fuel Combustion: Electric Utility source. Ex. 155 at 4 (Culley COBRA Analysis).

2018 that "[s]ince 2008, the [A.B.] Brown plants and Culley Unit 2 cycle more than any other Vectren South [CenterPoint Indiana] plant because they are not competitive in the MISO energy market." Ex. 153 at 14 (Wayne Games 2018 Testimony). He referred to Culley 2 (together with the A.B. Brown coal plant) as "among the most inefficient units within the State" and "the smallest and more expensive coal units in the MISO stack." *Id.* at 7, 8.

Moreover, if the unit runs at its average capacity factor from 2020 through 2025, the unit is expected to cost $1.9 million during the 90-day term of the June Culley Order. Ex. 5 at 6 (Synapse Report). Looking beyond the near term of the June Culley Order, Culley 2 would need extensive capital upgrades to run over a longer period. As CenterPoint Indiana's executive, Mr. Games, stated in 2018 as the company first explained its retirement plan for Culley 2:

> "[A] minimum of $70 million in additional capital investments are required to continue operating Culley Unit 2 through 2036. In part, this investment is driven because Culley Unit cannot solely rely on Culley Unit 3 for environmental compliance costs. A dry bottom ash system must be installed to comply with CCR and further investments may be required to comply with section 316b of the Clean Water Act (designed to protect fish and other aquatic wildlife at water intake and outfall structures) on the design and operation of the current river intake structure. In addition to these environmental costs, Culley Unit 2's distributed control system ('DCS') is a Honeywell system 1 installed in 2000 and must be updated or replaced because it is obsolete. A few other significant capital investments that would be required to keep Culley Unit 2 operating beyond 2023 include a turbine major overhaul, boiler acid clean, main transformer overhaul/replacement, major boiler component replacement, dry stack ductwork replacement, ID fan discharge ductwork, coal conveyor gallery replacement, boiler/high energy piping condition assessment, air heater basket replacement, continued overhaul of circulating water pumps and traveling water screens, and replacement of two 480-volt motor control center electrical switchgear."

Ex. 153 at 20-21 (Wayne Games 2018 Testimony). The referenced ash handling system was later approved for construction in 2022, with a capital cost equaling a portion of $19 million. Ex. 125 at 12 (IURC AB Brown CT Order). Additional information on required upgrades for continued operation of Culley 2, costing at least $16 to $20 million, is described *infra* at sec. IV.C.5.iii.

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All of these harms could be avoided by retiring Culley 2 and Schahfer 17 and 18 as planned. As further discussed below, CenterPoint Indiana South and NIPSCO wanted to retire these Plants at the end of 2025. MISO approved the retirements, and the Indiana Commission approved utility actions contemplating both Schahfer and Culley 2 retirements.

4. Schahfer's Retirement Has Been Carefully Planned and Well Executed to Ensure Resource Adequacy.

NIPSCO has been diligently planning the retirement of Schahfer's coal units since at least 2018. In Indiana, IRPs are rigorous processes that involve sophisticated modeling and scrutiny by diverse stakeholders and regulators. *See* section IV.A.4, above. In its 2018 IRP, NIPSCO announced a preferred resource plan that included the retirement of all four Schahfer coal units by 2023. NIPSCO's short term action plan from the 2018 IRP focused on initiating the retirement process for all four of the Schahfer coal units and acquiring replacement resources to fill the energy and capacity gap resulting from the retirements. NIPSCO's 2018 IRP determined that the retirement of Schahfer coal units provided "significant cost savings versus the status quo and offer[ed] an acceptable outcome for portfolio flexibility and with regard to the impact on employees and the local economy." Ex. 71 at 156 (NIPSCO 2018 IRP).

In its 2021 IRP, published in November of that year, NIPSCO noted that Schahfer Units 14 and 15—the larger coal generating units at the site—had been retired earlier that year, and NIPSCO stated that "Units 17 and 18 are on track to retire by the end of 2023." Ex. 72A at 9 (NIPSCO 2021 IRP, part 1). NIPSCO again confirmed that retiring these coal units was economically advantageous. In the 2021 IRP, NIPSCO noted that it continued to make progress on over a dozen Indiana Commission-approved generation projects to replace the retired capacity at Schahfer. Ex. 72A at 9 (NIPSCO 2021 IRP, part 1).

In May 2022, NIPSCO announced plans to delay the retirement of Schahfer Units 17 and 18 until 2025 after several solar projects faced delays associated with a United States Department of Commerce anti-dumping investigation. Ex. 73 (NIPSCO May 2022 Investor Call).

NIPSCO's 2024 IRP confirmed that Schahfer Units 17 and 18 "remain on track to retire by the end of 2025." Ex. 100A at 6 (NIPSCO 2024 IRP, part 1). To replace the retiring capacity at Schahfer, NIPSCO noted that it continued to make progress on its fourteen Indiana Commission-approved renewable energy projects, including wind, solar, and solar plus battery storage resources, while also gaining regulatory approval for a natural gas peaking resource that will be located at the Schahfer

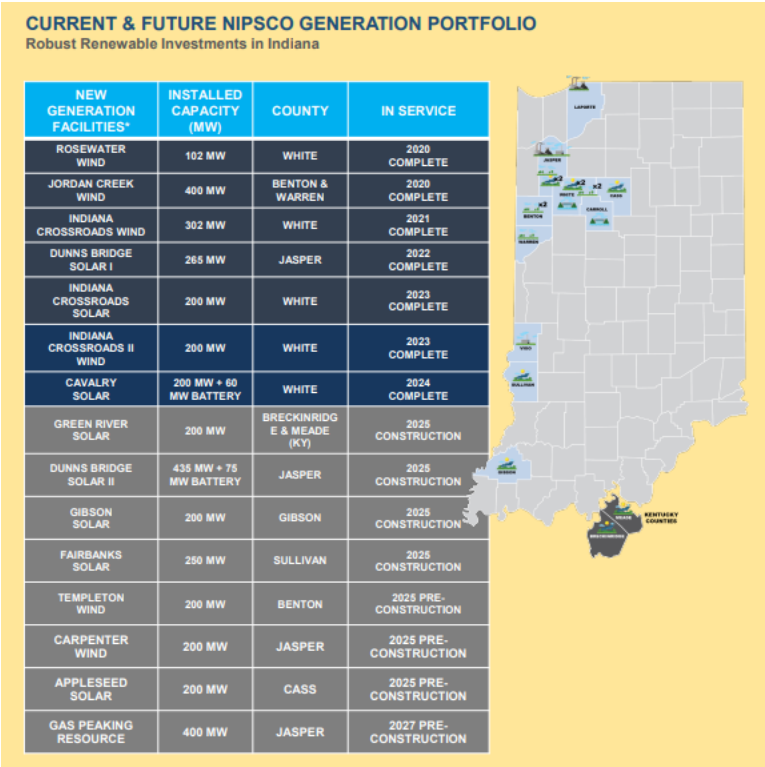
property and use the interconnection rights associated with the retiring Units 17 and 18. Ex. 100A at 1, 6–7 (NIPSCO 2024 IRP, part 1); Ex. 20 at 10, 17, 41 (IURC Schahfer Gas Plant Order); Ex. 132 at PDF pp. 14–16 (NIPSCO Rate Case Discovery Responses).

In sum, the retirement of Schahfer Units 17 and 18 results from nearly a decade of planning. In each of these successive resource planning exercises, NIPSCO confirmed that its customers would benefit from the retirement of Schahfer coal units.

i. Schahfer's Retirement Was the Product of a Generation Replacement Strategy that Improves Resource Adequacy.

Over the last decade, NIPSCO has brought forward and the Indiana Commission has approved a suite of generation resources that replace the output of the Schahfer coal units. As NIPSCO is moving from reliance on large single-station generation to a fleet of modern, smaller, more nimble generating units, the replacement of Schahfer is expected to improve reliability and grid resilience. *See* Ex. 132 (NIPSCO Rate Case Discovery Responses).

***Figure 5**: excerpt from Ex. 100A at Summary p. 7 (NIPSCO 2024 IRP, part 1).*



CURRENT & FUTURE NIPSCO GENERATION PORTFOLIO

Robust Renewable Investments in Indiana

NEW GENERATION FACILITIES*	INSTALLED CAPACITY (MW)	COUNTY	IN SERVICE
ROSEWATER WIND	102 MW	WHITE	2020 COMPLETE
JORDAN CREEK WIND	400 MW	BENTON & WARREN	2020 COMPLETE
INDIANA CROSSROADS WIND	302 MW	WHITE	2021 COMPLETE
DUNNS BRIDGE SOLAR I	265 MW	JASPER	2022 COMPLETE
INDIANA CROSSROADS SOLAR	200 MW	WHITE	2023 COMPLETE
INDIANA CROSSROADS II WIND	200 MW	WHITE	2023 COMPLETE
CAVALRY SOLAR	200 MW + 60 MW BATTERY	WHITE	2024 COMPLETE
GREEN RIVER SOLAR	200 MW	BRECKINRIDGE & MEADE (KY)	2025 CONSTRUCTION
DUNNS BRIDGE SOLAR II	435 MW + 75 MW BATTERY	JASPER	2025 CONSTRUCTION
GIBSON SOLAR	200 MW	GIBSON	2025 CONSTRUCTION
FAIRBANKS SOLAR	250 MW	SULLIVAN	2025 CONSTRUCTION
TEMPLETON WIND	200 MW	BENTON	2025 PRE-CONSTRUCTION
CARPENTER WIND	200 MW	JASPER	2025 PRE-CONSTRUCTION
APPLESEED SOLAR	200 MW	CASS	2025 PRE-CONSTRUCTION
GAS PEAKING RESOURCE	400 MW	JASPER	2027 PRE-CONSTRUCTION

In Cause No. 45947, the Indiana Commission approved ~400 MW of gas peaking capacity to be located at the Schahfer site. Ex. 20 (IURC Schahfer Gas Plant Order). NIPSCO relied on its planned retirement of Schahfer to demonstrate that the gas plant was displacing coal and eligible for construction-work-in-progress financing incentives under Indiana law. *Id.* at 21 ("Partial displacement of retiring coal-fired energy generation with a gas peaking resource has been a component of NIPSCO's IRP modeling and related CPCN regulatory filings since 2021. As such, we find the CT Project is being constructed to displace energy from an existing coal-fired generation facility and is therefore eligible for [construction-work-in-progress financing]."). The IDEM-issued air permit for these new peaking units provides that NIPSCO must retire Schahfer Units 17 and 18 before the combustion turbines begin to operate. Ex. 101 at 34 (Schahfer Title V Permit Modification) ("Upon the commencement of operation of the natural gas-fired simple cycle combustion turbines, identified as 19A, 19B, 19C, and Unit 20, the two (2) dry bottom pulverized coal-fired boilers, identified as Unit 17 and Unit 18, shall be permanently shutdown and subsequently decommissioned from the source."). Moreover, as noted above in this section IV.C.4, the new gas peaking capacity relies on using the retiring coal-fired units' existing transmission system interconnection rights.

Collectively, these projects improve reliability. These projects will allow NIPSCO to continue to meet its resource adequacy requirements. *See* section IV.A.4. The battery and peaking gas units are capable of responding to disturbance on the grid and to changing generation needs much more quickly than the coal units. Ex. 132 (NIPSCO Rate Case Discovery Responses).

ii. MISO and the Indiana Commission Continue to Take Actions in Reliance on Schahfer's Retirement.

For MISO asset owners like NIPSCO, no generating unit is permitted to retire without first being approved by MISO for retirement through a process that assures transmission system stability and resource adequacy. In January 2023, NIPSCO requested that MISO approve a retirement date of December 31, 2025, for Schahfer Units 17 and 18. In February 2023, MISO approved the retirement of Schahfer Units 17 and 18, finding no impact on reliability:

> "After being reviewed for power system reliability impacts as provided for under Section 38.2.7 of MISO's Open Access Transmission, Energy, and Operating Reserve Markets Tariff ('Tariff'), the suspension of Schahfer Units 17 and 18 would not result in violations of applicable reliability criteria. Therefore, Schahfer Units 17 and 18 may suspend without the need for the generators to be designated as System Support Resource ('SSR') units as defined in the Tariff."

Ex. 102 at PDF p. 12 (MISO Attachment Y Response to NIPSCO).

The Indiana Commission has also endorsed the retirement of Schahfer Units 17 and 18 in two distinct regulatory processes.

First, in 2019, 2023, and 2025 electric rate case final orders, the Indiana Commission approved depreciation rates and operations and maintenance spending for Schahfer that assumed NIPSCO's expected retirement dates. *See* Ex. 103 at 120 (NIPSCO 2019 Rate Order) (summarizing approved depreciation adjustment and noting NIPSCO's associated plan to retire Schahfer coal units); Ex. 104 at 13-14 (NIPSCO 2023 Rate Order) (approving demolition costs for Schahfer and adjusting depreciation recovery for Schahfer units); Ex. 106 at 23 (NIPSCO 2025 Rate Order) (describing approved settlement's reduction of O&M spending in revenue requirement for Schahfer Units 17 and 18 with their expected retirement in December 2025). While depreciation timelines and adjustments to O&M spending included in base rates do not legally require that a retirement occur on the projected retirement date, in each of these cases a broad coalition of stakeholders, including the Indiana Office of Utility Consumer Counselor (the statutory ratepayer representative), entered into a settlement agreement with NIPSCO that assumed the units would retire as projected by the utility, and agreed to adjust depreciation schedules and O&M spending accordingly. In each of these cases, the Indiana Commission approved the Schahfer depreciation schedule or O&M spending, while noting the utility's intention to retire the units.

Second, the Indiana Commission approved Certificates of Public Convenience and Necessity ("CPCNs") that NIPSCO received for new generation resources from 2018 through 2025, that were justified, in part, on a stated need to replace the Schahfer coal units. In approving these projects, the Indiana Commission explicitly noted that the generation was intended to replace Schahfer. The Indiana Commission order approving the 400 MW of gas peaking capacity for the Schahfer site, for example, found that "[Combustion Turbine] Project is designed to reliably cycle in response to the MISO market and will displace the retiring Schahfer coal units with more efficient and controllable load-following capacity." Ex. 20 at 28 (IURC Schahfer Gas Plant Order). Other CPCN orders approving NIPSCO's replacement generation include Indiana Commission Cause Nos. 45818, 45936, 45500, 46028, 45908, and 45887. In other words, the Commission has relied on and not objected to the plan for Schahfer retirements as it has approved NIPSCO's requests to build and charge customers for the cost of projects explicitly designed to replace the Schahfer units.

5. Culley 2's Retirement Has Been Carefully Planned and Well Executed, and Overseen by the Indiana Commission to Ensure Resource Adequacy.

CenterPoint Indiana has been planning the retirement of Culley 2—its "oldest, smallest (83 MW), and most inefficient coal generating unit"—for over a decade. Ex. 107 at 33 (Vectren 2014 IRP). In its 2014 IRP, CenterPoint Indiana found that retiring Culley 2 in 2020 would save customers money, but deferred making a decision due to load-growth and regulatory uncertainty. *Id.* at 25-26. The 2016 IRP confirmed that retiring Culley 2 in 2024 was part of the preferred plan for serving its customers. Ex. 108 at 44 (Vectren 2016 IRP). CenterPoint Indiana official Wayne Games informed the Indiana Commission two years later that:

> "Investing so heavily in a unit as old and inefficient as Culley Unit 2 is not economic. Vectren South's modeling bore this out. Due to the higher cost to operate, the unit has experienced less overall run time and much more unit cycling. Culley Unit 2 has reached the end of its useful life and should be retired rather than continuing to spend capital keeping the inefficient unit operating."

Ex. 153 at 21 (Wayne Games 2018 Testimony).

i. Culley 2's Retirement Was the Product of a Generation Replacement Strategy that Improves Resource Adequacy.

CenterPoint Indiana's initial plan to replace Culley 2 and the A.B. Brown coal plant with a combined-cycle gas facility at the A.B. Brown site was rejected by the Indiana Commission in 2019. *See* Ex. 114 (IURC 2019 CCGT Order). The Indiana Commission rejected this replacement gas facility because it found that the utility had failed to adequately consider alternatives, including the ability of renewables to replace some of the retiring coal energy and capacity. *Id.* at 25–28. The Indiana Commission directed CenterPoint Indiana to reevaluate its plan to replace its retiring coal units.

In its 2020 IRP, CenterPoint Indiana announced its revised coal-replacement preferred plan, responding to the Indiana Commission's order in Cause No. 45052. Instead of replacement with a single combined cycle gas facility, the revised plan called for replacement of the majority of CenterPoint Indiana's coal fleet—including A.B. Brown and Culley 2—by the end of 2023 with 700-1,000 MWs of solar, 300 MWs of wind, energy efficiency, and two gas combustion turbines ("CTs") totaling 460 MW. Ex. 115 at 51 (Vectren 2020 IRP). CenterPoint Indiana found that the fast-ramping CTs, combined with the wind and solar resources, enabled the utility "to maintain constant electric supply during potentially extended periods of low output" from renewables. *Id.* at 34–35. CenterPoint Indiana found that the 2020

preferred plan would save its customers $320 million over the study period compared to continued operation of its existing coal generation. *Id.* at 35.

In its 2023 IRP, CenterPoint Indiana observed that the Indiana Commission's approval of five generation projects from its 2020 preferred plan "affirms the direction taken" in replacing its coal units. Ex. 116 at 36 (CenterPoint 2023 IRP). The 2023 IRP modeling again found that a preferred portfolio that included the retirement of Culley 2 in 2025 would save its customers money. *Id.* at 38, 56; *see also id*. at 57 (preferred portfolio "[s]aves customers nearly $80 million over the next 20 years when compared to continued operation of F.B. Culley with coal."). CenterPoint's 2025 IRP again found that retiring Culley 2 in 2025 was a part of the utility's preferred plan. Ex. 80 at 20 (CenterPoint Indiana 2025 IRP Summary).

ii. MISO Likely Approved Culley 2's Retirement, and the Indiana Commission has Approved Adjustments to the Culley Depreciation Schedule and Repeatedly Approved Generation Projects Specifically Designed to Allow Culley 2 to Retire.

CenterPoint Indiana submitted an Attachment Y notice to MISO, as required under MISO's FERC-approved tariff, seeking approval to retire Culley 2 at the end of 2025. Ex. 21 at 52 (CenterPoint Indiana 2025 IRP). While the MISO response to this Attachment Y filing has not been made public, CenterPoint noted that Culley 2 had operated "past its useful life" and remained on track for a 2025 retirement. *Id.* at 30. CenterPoint noted in a recent filing at FERC that "MISO reviewed the Company's suspension request for Culley Unit 2 and found no reliability criteria violations." Ex. 128 at 9 (CenterPoint Cost Allocation Complaint).

The Indiana Commission has supervised CenterPoint's resource planning and endorsed the retirement of Culley 2 in two categories of regulatory proceedings. Since 2020, the Indiana Commission has approved a series of generating resources that were explicitly premised on replacing Culley 2 and other now-retired coal units. For example, in Cause No. 45564, in approving the construction of 460 MW of gas peaking capacity, the Indiana Commission observed that the "Preferred Portfolio identified through the 2019/2020 IRP called for the retirement or exit of energy provided by coal-burning units at the Brown and Culley generating stations." Ex. 125 at 16 (IURC AB Brown CT Order). The Indiana Commission further observed of this replacement plan:

> "The Preferred Portfolio mapped a shift from a generating fleet of predominantly coal-burning resources to one of intermittent renewable resources supported by gas generation to ensure reliability. One early step in implementing the Preferred Portfolio was the addition of solar generating resources approved by the Commission in Cause Nos.

> 45501 on October 27, 2021 and 45600 on May 4, 2022. A next step is the addition of the two new CTs requested in this Cause."

Id. at 16. Thus, in approving CPCNs for replacement resources, the "steps" in CenterPoint Indiana's replacement plan, the Indiana Commission approved CenterPoint Indiana's plan to retire and replace Culley 2.

Second, in Cause No. 45990, a CenterPoint Indiana electric rate case, the Indiana Commission approved an adjustment in test-year spending associated with the retirement of Culley 2. Ex. 126 at 58 (IURC 2025 CenterPoint Rate Order); *see also* Ex. 127 at 30 (Chrissy Behme Testimony) (rate schedules filing "reflects a pro forma adjustment decrease to test year expense associated with F.B. Culley Unit 2, which is forecasted to retire at the end of the test year."). In other words, the Indiana Commission has already approved a reduction in rate recovery associated with the Culley 2 retirement.

iii. CenterPoint Indiana Asked the Department to Not Renew the December Culley Order.

In February of this year, CenterPoint Indiana furnished a letter to the Department, noting that "maintaining F.B. Culley Unit 2 [] will require substantial investment to support an inefficient and increasingly unreliable asset, rather than advancing affordable and reliable service for customers in southwestern Indiana." Ex. 169 at 1 (CenterPoint Letter to USDOE). CenterPoint specifically asked the Department to "allow [the December Culley Order] to expire on March 23, 2026, and abstain from issuing subsequent Section 202(c) directives for Unit 2." *Id.* CenterPoint indicated that it "ha[s] adequate generation capacity – without Unit 2 – to meet MISO's Planning Reserve Margin Requirement through the 2027–2028 Planning Year[.]" *Id.* For the 48 days from the date of the December Culley Order through February 8, 2026, Unit 2 was on outage due to equipment issues for 26 days; available but not economically dispatched on five days; and on 17 other days, running but limited to between 45 MW and 78 MW (net) due to maintenance issues. *Id.* at 2.

What's more, as CenterPoint stated, reviving Culley 2 to a shipshape condition would be extremely lengthy and expensive. "Safe and reliable operation beyond March 2026 hinges on major and costly interventions, including acid cleaning of the boiler and replacement of boiler tubes—necessitating a four-week or longer outage, with projected cost of approximately $1.9 million – $2.5 million." *Id.* at 2. CenterPoint also indicated that Culley needs an "unavoidable" turbine overhaul (as current operation is significantly increasing the risk of catastrophic mechanical failure"), which would entail a 10-week outage and total expenditures of at least $14

million – $18 million, if not more. *Id.* at 2. CenterPoint stated that "extending the life of Unit 2 is neither practical nor financially responsible." *Id.* at 2.

V. REQUEST FOR REHEARING

The Orders are a manifestation of the Department's overarching policy to systematically misapply Section 202(c) of the Federal Power Act to preserve fossil-fueled power plants, including coal-fired plants, that otherwise would be retired. That policy aims to bolster the fossil energy industry, irrespective of need, expense, and harm. In its zeal to implement its policy through issuance of the Orders, (1) the Department has exceeded the authority Congress gave it, using its "emergency" powers in the absence of any imminent shortfall to impose federal control over basic generation and supply decisions; and (2) the Department has done so without reasoned decision-making and on the basis of purported "facts" that are not supported by credible evidence. *See Michigan v. EPA*, 268 F.3d 1075, 1081 (D.C. Cir. 2001) (explaining that, absent statutory authorization, an agency's action is contrary to law); *Allentown Mack Sales & Serv., Inc. v. Nat'l Labor Rel. Bd.*, 522 U.S. 359, 374 (1998) (explaining agency obligation to undertake reasoned-decision-making); *Motor Vehicle Mfrs. Assn. of United States, Inc. v. State Farm Mut. Automobile Ins. Co.,* 463 U.S. 29, 43 (1983) (same); *Burlington Truck Lines, Inc. v. United States*, 371 U.S. 156, 168 (1962) ("The agency must make findings that support its decision, and those findings must be supported by substantial evidence."); *Butte Cnty. v. Hogen*, 613 F.3d 190, 194 (D.C. Cir. 2010) ("[A]n agency cannot ignore evidence contradicting its position."). Numerous examples of the Department's unreasoned and unlawful decision-making are described throughout this section V. The only plausible explanation for these repeated legal errors is that the Department has prioritized implementing its policy over compliance with law.

Congress never conferred on the Department the broad authority over the country's mix of power generation resources that the Department seeks to wield under the pretense of responding to claimed "emergencies." To the contrary, Congress explicitly reserved authority over resource adequacy and grid reliability to the states, FERC, and NERC. *See, e.g.*, 16 U.S.C. §§ 824(a)–(b), 824o; *Pac. Gas & Elec.*, 461 U. S. at 205. Both the agency's new policy and the Orders exceed the Department's authority and are therefore contrary to law.

Before tackling the Orders' legal faults and issues, *see infra* sections V.A through V.D, it is useful to understand the broader context of the Department's policy. The Department acknowledges that its Orders are based on a government-wide policy—dictated by Executive Order—of promoting fossil-based energy through the use of any emergency powers executive departments and agencies could try to invoke. The

Orders rely upon the Energy Emergency EO, 90 Fed. Reg. 8433, which directs the heads of all executive departments and agencies to use "emergency authorities" and "other lawful authorities" to facilitate the production, extraction, creation, and generation of coal and other fossil fuels.

The Orders also rely on another executive order, the Grid EO (Ex. 93). The Grid EO was issued at the same time as three other executive actions aimed at giving a lifeline to the coal industry, and was announced at a White House political event focused on promoting coal. Ex. 94 (NY Times Coal Article). In essence, the Grid EO calls on the Department to assume the authority for resource adequacy and grid reliability decision-making that the Federal Power Act reserves to others, and to "systemize" the issuance of Section 202(c) orders for that improper purpose. *See* Ex. 93, 90 Fed. Reg. at 15521–22 (Grid EO) (directing the Department to "streamline, systemize and expedite" the issuance of Section 202(c) orders; to develop a "uniform methodology" for assessing reserve margins and a protocol to retain generators the Secretary deems critical to system reliability; and to prevent certain generators from leaving the bulk-power system or converting to a different fuel source). In addition, each of the two Orders points to a White House memo claiming, with no factual basis, that coal is essential to national defense. Ex. 191 at 8 (June Schahfer Order); Ex. 192 at 7 (June Culley Order).

The Department's words and actions following issuance of the Grid EO reveal its efforts to unlawfully arrogate to itself others' lawful authority through systematic misapplication of Section 202(c) to prop up coal-burning power plants. The Department's initial steps included issuing a Section 202(c) order to prevent the well-planned retirement of the J.H. Campbell Generating Plant in Michigan. *See* Ex. 150 (May Campbell Order). The Department's order was clear on one point—Campbell cannot be allowed to retire—but left vague and unclear almost everything else. *See, e.g.*, *Consumers Energy Co. v. Midcontinent Indep. Sys. Op., Inc.*, 192 FERC ¶ 61,158, at PP 39–40 (2025) (recognizing the variety of interpretations of the Campbell order and settling on "the most reasonable reading of the DOE Order's intended scope"). The May Campbell Order failed to make clear even where the grid supposedly needed energy from Campbell, selectively quoted sources without examining their context and core findings, and flouted Congress' explicit limitations on the Department's Section 202(c) powers. *See* Motion to Intervene and Request for Rehearing and Stay of Sierra Club et al. at *passim* (June 18, 2025), https://www.energy.gov/sites/default/files/2025-07/PIO%20Request%20for%20Rehearing%20of%20Order%20No.%20202-25-3.pdf.

After preventing Campbell's retirement, the Department continued to implement its policy. In addition to the Orders on the NIPSCO and CenterPoint Indiana Plants, the Department has issued Section 202(c) orders to prevent fossil-

burning plant retirements in Pennsylvania, Order Nos. 202-25-4, 202-25-8, & 202-25-10, in Washington, Order No. 202-25-11, and in Colorado, Order No. 202-25-14.

Additionally, on July 7, 2025, the Department published the "methodology" required by the Grid EO, which the Department explained will "guide reliability interventions," including the use of Section 202(c) orders. Ex. 96 at vi (July 2025 Resource Adequacy Report); *see also* Ex. 97 at 3–4 (DOE July 7, 2025 Press Release) ("The methodology also informs the potential use of DOE's emergency authority under Section 202(c) of the Federal Power Act."). The report identifies no present or imminent emergency; at most, using deeply flawed methodology, it identifies a theoretical shortfall of generation in 2030. As the Supreme Court has observed in rejecting the Trump Administration's emergency import tariffs, "'Emergency powers,' after all, 'tend to kindle emergencies.'" *Learning Resources, Inc. v. Trump*, 607 U. S. ____ (2026), Slip Op. *12 (quoting *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U. S. 579, 650 (1952)). Here, the asserted "emergency" by the Department is likewise merely an outgrowth of the Administration's policy preferences.

Taken together, the Energy Emergency EO, Grid EO, July 2025 Resource Adequacy Report, and the Department's Section 202(c) orders reflect a policy to promote the long-term preservation of fossil-fueled electric generation, including coal-fired generation, by using the Department's emergency authority under Section 202(c). To the extent these actions left any room for doubt that the Department has such a policy, Energy Secretary Wright's own words have removed it. In his statement to the press when the Centralia Order issued, Secretary Wright emphasized, "The Trump administration will continue taking action to keep America's coal plants running." Ex. 133 (Department Press Release on Centralia Order); *see also* Ex. 149 at *passim* (New York Times Article on Trump's Coal Plant Policy); Ex. 76 (Secretary Wright's West Virginia Remarks) (reporting Secretary Wright's stated intention to stop the closure of coal plants and claiming authority to do so).

The Department has further reinforced this policy by applying it in the Orders.

A. The Orders Address Circumstances Beyond the Lawful Scope of an Emergency Under Section 202(c), and Fail to Provide Evidence or Reasoned Decision-Making Substantiating the Existence of an Emergency that Can Come Within Section 202(c).

1. Legal Framework: Section 202(c) Empowers the Department to Respond Only to Imminent Concerns.

The Orders invoke Section 202(c) of the Federal Power Act, which provides:

> "During the continuance of any war in which the United States is engaged, or whenever the Commission determines that an emergency exists by reason of a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation of transmission of electric energy . . . the Commission shall have authority . . . with or without notice, hearing, or report, to require by order such temporary connections of facilities and such generation, deliver, interchange, or transmission of electric energy as in its judgment will best meet the emergency and serve the public interest."

16 U.S.C. § 824a(c)(1). That authority was transferred to the Department by the Department of Energy Organization Act. *See* 42 U.S.C. § 7151(b).

Section 202(c)'s text and context establish that an "emergency" enabling the Department to override state and private decision-making must be an event that is an imminent circumstance. 16 U.S.C. § 824a(c). As such, the Department may act only where there exists a pressing necessity or exigency that calls for immediate action or remedy from the Department. The constrained scope of Section 202(c)'s emergency authority is confirmed by the broader statutory context—in particular, the separate regime delineating federal authority over bulk-system reliability in Section 215 of the Federal Power Act, *id.* § 824o—as well the Department's regulations, caselaw applying Section 202(c), and the Department's consistent past practice.

i. The Text and Context of Section 202(c) Confine Emergency to Imminent Circumstances.

Section 202(c)'s text empowers the Department to require generation only if an emergency exists. *Id.* § 824a(c). Both the ordinary meaning of the term (which the statute does not expressly define) and statutory context limit the Department's emergency authority to circumstances of pressing necessity or exigency that call for immediate action or remedy from the Department. At the time Congress enacted Section 202(c), Webster's New International Dictionary of the English Language (1930) defined "emergency" as, with emphasis added here, a "*sudden* or *unexpected* appearance or occurrence… An *unforeseen* occurrence or combination of circumstances which calls for *immediate* action or remedy; *pressing* necessity; exigency." Contemporary dictionaries similarly define "emergency" as demanding imminence: an emergency is "an *unforeseen* combination of circumstances or the resulting state that calls for *immediate* action." Merriam Webster's Dictionary 407 (11th ed. 2009) (emphasis added); *see* 3 Oxford English Dictionary 119 (1st ed. 1913) (defining emergency similarly as "a state of things *unexpectedly* arising, and urgently demanding *immediate* action" (emphasis added)); *see also* Benjamin Rolsma, *The New Reliability Override*, 57 Conn. L. Rev. 789, 812 n.147 (2025)

(noting that dictionaries have given the term "emergency" the "same meaning for many years").

The remainder of Section 202(c) underscores the exigency inherent in the governing term "emergency." The authority granted by Section 202(c) is, in the first instance, a war-time power. 16 U.S.C. § 824a(c) (beginning with "[d]uring the continuance of any war in which the United States is engaged"); *see Jarecki v. G.D. Searle & Co.*, 367 U.S. 303, 307 (1961) (noting that statutory terms should be interpreted in the context of nearby parallel terms "in order to avoid the giving of unintended breadth to the Acts of Congress"). An "emergency" under the statute is limited to circumstances of similar urgency—for example, circumstances caused by "a *sudden* increase in the demand for electric energy," for example. 16 U.S.C. § 824a(c) (emphasis added); *see Richmond Power & Light v. FERC*, 574 F.2d 610, 615 (D.C. Cir. 1978) (holding that Section 202(c) "speaks of 'temporary' emergencies, epitomized by wartime disturbances"); S. Rep. No. 74-621, at 49 (1935) (explaining that Section 202(c) provides "temporary power designed to avoid a repetition of the conditions during the last war, when a serious power shortage arose").

The text's use of the present tense accentuates its focus on imminent and certain concerns: It empowers the Department to act only where "an emergency *exists*." 16 U.S.C. § 824a(c) (emphasis added). The Section's title and text both emphasize that it provides a "temporary" authority, further demonstrating that its scope extends only to immediate—not distant—needs. *Id.* § 824a(c), (c)(1); *see Dubin v. United States*, 599 U.S. 110, 120–21 (2023) (cleaned up) ("The title of a statute and the heading of a section are tools available" to resolve "the meaning of a statute," and "a title is especially valuable where it reinforces what the text's nouns and verbs independently suggest."). That near-term focus precludes use of Section 202(c) to pursue broader or long-term energy-policy goals, such as a "fear of overdependence" on foreign oil supplies, *Richmond Power & Light*, 574 F.2d at 617, or "energy independence," Ex. 96 at 1 (July 2025 Resource Adequacy Report); *see also Richmond Power & Light*, 574 F.2d at 614 (Section 202(c) "speaks of 'temporary' emergencies, epitomized by wartime disturbances, and is aimed at situations in which demand for electricity exceeds supply and not those in which supply is adequate but a means of fueling its production is in disfavor.").

Section 202's overall structure further highlights Section 202(c)'s emphasis on imminent, near-term concerns. The preceding subsections in Section 202 (*i.e.*, 202(a) and (b)) together define and limit the tools by which the federal government may pursue "abundant" energy supplies in the normal course. 16 U.S.C. § 824a(a) (seeking "abundant supply of electric energy" by directing the federal government to "divide the country into regional districts for the voluntary interconnection and coordination of facilities for the generation, transmission, and sale of electric

energy"); *id.* § 824a(b) (allowing federal government to order "physical connection . . . to sell energy to or exchange energy" upon application, and after an opportunity for hearing). The resulting statutory "machinery for the promotion of the coordination of electric facilities" comprises the following: in subsection (a), an instruction to establish a general framework meant to facilitate "coordination by voluntary action;" in subsection (b), "limited authority to compel interstate utilities to connect their lines and sell or exchange energy," subject to defined procedural and substantive requirements, when "interconnection cannot be secured by voluntary action;" and in subsection (c), "much broader" but "temporary" authority "to compel the connection of facilities and the generation, delivery, or interchange of energy during times of war or other emergency." S. Rep. No. 74-651 at 49 (1935).

That tiered structure—placing primary emphasis on voluntary resource adequacy planning, 16 U.S.C. § 824a(a), specifying limited authority where that voluntary system fails, *id.* § 824a(b), and allowing for "temporary" central command-and-control only in case of an "emergency," *id.* § 824a(c)—requires that Section 202(c) remain narrowly confined to instances of an immediate and unavoidable "break-down in electric supply," S. Rep. No. 74-651 at 49 (1935), rather than a mere desire for more abundant supply in the future, *cf.* Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 5 (December Culley Order); Ex. 158 at 8 (March Schahfer Order); Ex. 159 at 8 (March Culley Order); Ex. 191 at 9 (June Schahfer Order); Ex. 192 at 8 (June Culley Order) (emphasis added) (pointing to conditions that "will continue in the near term" and "are also *likely* to continue in *subsequent years*" that "*could* lead to the loss of power . . . in the areas that *may* be affected by curtailments or power outages, presenting a *risk* to public health and safety"). The tiered structure authorizes increasingly intrusive federal intervention, but under increasingly narrow circumstances. Interpreting Section 202(c)'s "emergency" powers to permit the Department to compel generation based on nothing more than the generalized challenges of operating a reliable bulk electric system in a transforming energy landscape, or concerns over longer term resource adequacy, *see* Ex. 1 at 2 (December Schahfer Order); Ex. 2 at 1, 2 (December Culley Order); Ex. 158 at 1, 2 (March Schahfer Order); Ex. 159 at 1, 2 (March Culley Order); Ex. 191 at 2–9 (June Schahfer Order); Ex. 192 at 1–8 (June Culley Order), would unwind the careful balance of voluntary, market-driven action and federal power set out in Sections 202(a) and 202(b). Such an interpretation cannot be squared with the statutory text and structure. *See Otter Tail Power Co. v. Fed. Power Comm'n*, 429 F.2d 232, 233–34 (8th Cir. 1970) (holding that Section 202(c) "enables the Commission to react to a war or national disaster," while Section 202(b) "applies to a crisis which is likely to develop in the foreseeable future").

ii. Congress' Enactment of a Specific, Cabined Scheme to Address Reliability Concerns Confirms That Generalized or Long-Term Bulk-Power System Reliability Concerns Are Not an "Emergency" Under Section 202(c).

That the Department's Section 202(c) emergency powers do not extend to general supervision of bulk-power-system reliability is confirmed by Section 215 of the Federal Power Act—which specifically and directly delineates the scope of federal authority to enforce mandatory reliability requirements for the bulk-power system. 16 U.S.C. § 824o. Congress added Section 215 to the Federal Power Act in 2005 precisely because the Act as it then existed—including Section 202—did not give the federal government the power to enforce measures designed to ensure bulk-system reliability. *See Rules Concerning Certification of the Elec. Reliab. Org.; and Procedures for the Establishment, Approval, and Enforcement of Elec. Reliab. Standards*, 70 Fed. Reg. 53117, 53118 (Sept. 7, 2005) ("In 2001, President Bush proposed making electric Reliability Standards mandatory and enforceable," leading to enactment of Section 215 in 2005); Ex. 139 at 7-6 (*Report of the Nat'l Energy Pol'y Dev. Grp.*) (noting that "[r]egional shortages of generating capacity and transmission constraints combine to reduce the overall reliability of electric supply in the country" and that "one factor limiting reliability is the lack of enforceable reliability standards" because "the reliability of the U.S. transmission grid has depended entirely on *voluntary* compliance," and then recommending "legislation providing for enforcement" of reliability standards (emphasis added)); S. Rep. No. 109-78 at 48 (2005) (stating that Section 215 "changes our current voluntary rules system" for bulk-system reliability "to a mandatory rules system"); *see also Alcoa, Inc. v. FERC*, 564 F.3d 1342, 1344 (D.C. Cir. 2009) (noting that prior to the Energy Policy Act of 2005, "the reliability of the nation's bulk-power system depended on participants' voluntary compliance with industry standards").

By enacting Section 215, Congress provided a comprehensive and carefully circumscribed scheme to empower the federal government to enforce bulk-system reliability requirements. That statutory scheme strikes a careful balance between state and federal authority, and between private, market-driven decisions and top-down control. Reliability standards are devised by NERC independent "of the users and owners and operators of the bulk-power system" but with "fair stakeholder representation." 16 U.S.C. § 824o(c)–(d); *see also id.* § 824o(a)(3) (defining reliability standards as "a requirement . . . to provide for reliable operation of the bulk-power system"). FERC may approve or remand those standards (but not replace them with its own) and is required to "give due weight" to NERC's "technical expertise" while independently assessing effects on "competition." *Id.* § 824o(d)(2)–(4). Section 215 provides specified enforcement mechanisms and procedures for reliability standards—which mechanisms conspicuously exclude the power to command specific generation resources to remain operational. *Id.* § 824o(e). And Section 215

carefully preserves state authority over "the construction of additional generation" and in-state resource adequacy, establishing regional advisory boards to ensure appropriate state input on the administration of reliability standards. *Id.* § 824o(i)–(j).

Interpreting Section 202(c) to permit the Department to mandate generation based on its own unfettered assessment of bulk-system reliability needs would effectively allow the Department to bypass Section 215's procedural safeguards, constraints on federal authority, and protection of state power. Such a bypass would impermissibly "contradict Congress' clear intent as expressed in its more recent," reliability-specific legislation, enacted "with the clear understanding" that the Department had "no authority" to address long-term reliability through Section 202(c). *See FDA v. Brown & Williamson Tobacco Corp.*, 529 U.S. 120, 142 & 149 (2000); s*ee also Cal. Indep. Sys. Operator Corp. v. FERC*, 372 F.3d 395, 401–02 (D.C. Cir. 2004) ("Congress's specific and limited enumeration of [agency] power" over a particular matter in one Section of the Federal Power Act "is strong evidence that [a separate Section] confers no such authority on [agency]."). Congress has, in Section 215, directly established the mechanisms (and limitations) by which the federal government may compel action to ensure the reliability of bulk-power electric system. In so doing, it has confirmed that the Department may not, through Section 202(c) "emergency" orders, use those reliability concerns to mandate the generation it views as required to address broad resource adequacy problems ; the Department's emergency authority is confined to shortfalls requiring immediate response.

iii. The Department's Regulations Similarly Establish that Section 202(c) Emergency Authority Can Be Invoked Only to Address Imminent, Certain Supply Shortfalls.

The Department's regulations demonstrate its own long-standing understanding that Section 202(c)'s emergency authority is confined to imminent, certain, and otherwise unavoidable resource shortages, and does not provide a mechanism to address broad, long-term concerns as to the reliability of the bulk-power system. The regulations recognize that an emergency under Section 202(c) requires, first, "a *specific* inadequate power supply situation." 10 C.F.R. § 205.371 (emphasis added). The Department's non-specific dissatisfaction with regional power planning does not, consequently, empower the Department to override that planning by emergency order. The need for both specificity and certainty is repeated in the Department's regulations defining an inadequate energy supply: "A system may be considered to have" inadequate supply when "the projected energy deficiency . . . *will* cause the applicant [for a 202(c) Order] to be unable to meet its normal peak load requirements based upon use of all of its otherwise available resources so that

it *is* unable to supply adequate electric service to its customers." *Id.* § 205.375 (emphasis added). The same provision suggests that an emergency will generally exist only when "the projected energy deficiency . . . without emergency action by the [Department], will equal or exceed 10 percent of the applicant's then normal daily net energy for load." *Id.*

The regulations further recognize that Section 202(c) does not provide a means of planning against far-off expectations or risks. They define an emergency as "an *unexpected* inadequate supply of electric energy which may result from the *unexpected* outage or breakdown" of generating, transmission, or distribution facilities—not a tool to ensure future energy abundance, or override state and private planning that the Department deems inadequate. 10 C.F.R. § 205.371 (emphasis added). Under the regulations, emergencies are characterized by shortages produced by "weather conditions, acts of God, or unforeseen occurrences not reasonably within the power of the affected 'entity' to prevent." *Id.* Where the culprit is increased demand, it must be "a *sudden* increase in customer demand," *id.* (emphasis added), rather than demand projections producing non-immediate reliability concerns.

And while the regulations suggest that "inadequate planning or the failure to construct necessary facilities can result in an emergency," they recognize that the Department may not utilize a "continuing emergency order" to mandate long-term system planning. *Id.* The regulations also recognize that "where a shortage of electricity is projected due solely to the failure of parties to agree to terms, conditions, or other economic factors" there is no emergency "unless the inability to supply electric service is *imminent*." *Id.* (emphasis added). An emergency may exist where past planning failures produce an immediate, present-tense shortfall (that is where, a shortfall *results* from insufficient planning); the Department has no authority to commandeer bulk-system reliability planning merely because it deems current plans inadequate. *See* 10 C.F.R. § 205.375 (requiring present inability to meet demand to demonstrate inadequate energy supply). As the Department stated when it promulgated those regulations, the statute allows the Department to provide "assistance [to a utility] during a period of unexpected inadequate supply of electricity," but does not empower it to "solve long-term problems." *Emergency Interconnection of Elec. Facilities and the Transfer of Elec. to Alleviate an Emergency Shortage of Elec. Power,* 46 Fed. Reg. 39984, 39985–86 (Aug. 6, 1981).

iv. Courts Have Uniformly Held that Section 202(c) Can Be Invoked Only in Immediate Crises.

Caselaw applying Section 202(c) further supports the narrow circumstances under which it permits the Department to seize command of the power system.

Richmond Power and Light arose out of the 1973 oil embargo. The Federal Power Commission responded to the embargo by calling for voluntary transfer of electricity from non-oil power plants to areas of the country that relied heavily on oil, such as New England. 574 F.2d at 613. The New England Power Pool was not convinced that the voluntary program would work and petitioned the Commission for a 202(c) order. *Id*. Rather than issue such an order, the Commission facilitated an agreement between state commissions and supplying utilities, which satisfied the New England Power Pool, leading it to withdraw its petition. *Id*. A dissatisfied utility sought judicial review of the Commission's decision to allow the withdrawal of the Section 202(c) petition. *Id*. at 614.

The court upheld the Commission's decision not to invoke Section 202(c). *Id*. Though the oil embargo had ended, the utility argued that the "high cost and uncertain supply of imported oil" justified an emergency order. *Id*. The Commission countered that the voluntary program had worked, the New England Power Pool never interrupted service, and there was no need for a Section 202(c) order. *Id*. at 615. The D.C. Circuit agreed. *Id.* The utility alternatively argued that "dependence on imported oil leaves this country with a *continuing* emergency." *Id*. (emphasis added). The court observed that Section 202(c) "speaks of 'temporary' emergencies, epitomized by wartime disturbances." *Id*. Interpreting this statutory language, the court upheld the Commission's view that Section 202(c) cannot be used when "supply is adequate but a means of fueling its production is in disfavor." *Id*.

Richmond Power & Light thus teaches that Section 202(c) is not an appropriate means to implement long-term national policy to switch fuels.

The Eighth Circuit has similarly held that Section 202(c) can only be used to respond to immediate crises. In *Otter Tail Power*, a utility insisted that the only way for the Federal Power Commission to properly order the utility to connect to a municipal power provider was to issue a Section 202(c) order. 429 F.2d at 234. Demand for electricity in the city had increased, and the peak load of the municipal power provider was getting to be so high that both of its two generators would likely need to be used simultaneously in the near future, "causing a possible loss of service should one malfunction during a peak period." *Id*. at 233–34. To avoid this possible loss of service, the Federal Power Commission issued a Section 202(b) order, requiring the utility to connect to the municipal power provider. *Id.* The utility argued that the Federal Power Commission used the wrong provision and should have used Section 202(c) instead. *See id.*

The court explained that Section 202(c) "enables the Commission to react to a war or national disaster" by ordering "immediate" interconnection during an "emergency." *Id*. at 234. For non-emergency situations, "[o]n the other hand,

Section 202(b) applies," including when there is a "crisis which is likely to develop in the foreseeable future but which does not necessitate immediate action on the part of the Commission." *Id*. The court upheld the Commission's use of Section 202(b) instead of Section 202(c) because there was no immediate emergency. *See id.* The case law uniformly supports the interpretation that Section 202(c) can only be used in short-term, urgent emergencies.

v. The Department's Prior Orders Recognize that Section 202(c) Does Not Confer Plenary Authority Over Bulk-System Resource Adequacy.

The Department's consistent application of Section 202(c) before 2025 further corroborates the urgency of the emergency conditions that are the necessary predicate for any Department intervention under Section 202(c). *See Fed. Trade Comm'n v. Bunte Bros., Inc.*, 312 U.S. 349, 352 (1941) ("[J]ust as established practice may shed light on the extent of power conveyed by general statutory language, so the want of assertion of power by those who presumably would be alert to exercise it is equally significant in determining whether such power was actually conferred."). Since obtaining authority under Section 202(c) in the 1970s and before 2025, the Department has consistently used Section 202(c) to address specific, imminent, and unexpected shortages—not to address longer-term reliability concerns or demand forecasts. *See, e.g.*, Ex. 9 at 1 (DOE Order No. 202-22-4) (responding to ongoing severe winter storm producing immediate and "unusually high peak load" between Christmas Eve and Boxing Day); Ex. 17 at 1–2 (DOE Order No. 202-20-2) (responding to shortages produced by ongoing extreme heat and wildfires); Ex. 105 at 1 (DOE Order No. 202-08-1) (ordering temporary connection of facilities in response to "massive devastation caused by Hurricane Ike," leaving "large portions" of Texas "without electricity"); *see also* Rolsma, 57 Conn. L. Rev. at 803–04 (describing "sparing[]" use of Section 202(c) outside of war-time shortages during the twentieth century).[12] Public Interest Organizations are not aware of any instance in which, before 2025, the Department utilized Section 202(c) in response to generalized regional risks that had not produced an

[12] The Department has also narrowly tailored the remedies in Section 202(c) orders to ensure that the orders only address the stated emergency, to limit the order to the minimum period necessary, and to mitigate violations of environmental requirements and impacts to the environment. *See, e.g.*, Ex. 9 at 4–7 (DOE Order No. 202-22-4) (limiting order to the 3 days of peak load, directing PJM to exhaust all available resources beforehand, requiring detailed environmental reporting, notice to affected communities, and calculation of net revenue associated with actions violating environmental laws); Ex. 17 at 3–4 (DOE Order No. 202-20-2) (limiting order to the 7 days of peak load, directing CAISO to exhaust all available resources beforehand, requiring detailed environmental reporting).

immediate need for the Department to address a particular, defined generation shortfall, and for good reason: Any such use would exceed the Department's statutory authority.

2. The Order Primarily Focuses on Long-Term Bulk-System Reliability, Which Is Not an Emergency Under Section 202(c), and Separately the Claimed Long-Term Emergency is Unreasoned and Not Based on Substantial Evidence.

The Orders primarily rely upon assertions of long-term bulk-system reliability concerns. *See* Ex. 1 at 1–4 (December Schahfer Order); Ex. 2 at 1–4 (December Culley Order); Ex. 158 at 1-6 (March Schahfer Order) at 1-6; Ex. 159 at 1-6 (March Culley Order); Ex. 191 at 2–9 (June Schahfer Order); Ex. 192 at 1–8 (June Culley Order). Those concerns—even if fully substantiated—would not be a basis to mandate Culley's and Schahfer's continued operation. And they are not substantiated. MISO, the Indiana Commission, NIPSCO, and CenterPoint Indiana have taken and are continuing to take steps to address longer-term concerns to ensure no resource shortfall arises.

i. Even Assuming Arguendo *Evidentiary Support, the Department's Long-Term Concerns Are Not an "Emergency" Within the Meaning of 202(c).*

The Orders claim "a potential longer term resource adequacy emergency in MISO," acknowledging a "capacity surplus for the summer of 2026," but citing projections of possible "insufficient capacity to meet the peak demand for electricity in each of the following four summers"—that is, arising no earlier than the Summer of 2027. Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 5 (March Schahfer Order); Ex. 159 at 5 (March Culley Order) (also noting "surplus of generation capacity" in the Winter of 2026, "followed by increasing deficits the following four years."); Ex. 191 at 6 (June Schahfer Order); Ex. 192 at 5 (June Culley Order). Even if the Orders' claimed emergency conditions were established (they are not), reliability concerns arising beyond "the near term . . . in subsequent years," Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 5 (December Culley Order); Ex. 158 at 8 (March Schahfer Order); Ex. 159 at 8 (March Culley Order); Ex. 191 at 9 (June Schahfer Order); Ex. 192 at 8 (June Culley Order), do not qualify as an emergency under Section 202(c). Such concerns are not imminent.

At most, the Orders describe long-term trends that may affect the reliability of the bulk power system in the future if left unaddressed. The Orders' longer-term concerns are based on projections of demand increases, changes in the mix of power supply resources, challenges in resource development, and the Administration's view of foreign actors. *See* Ex. 1 at 1–4 (December Schahfer Order); Ex. 2 at 1–4 (December Culley Order); Ex. 158 at 1–5 (March Schahfer Order); Ex. 159 at 1–5

(March Culley Order); Ex. 191 at 2–9 (June Schahfer Order); Ex. 192 at 1–8 (June Culley Order).

While many of the Orders' stated concerns are the province of state, regional, and private entities, Congress has provided certain mechanisms for the federal government to address the reliability concerns raised in the Orders. The emergency provision in Section 202(c), along with the Department's claimed power to seize command-and-control authority over generating resources like Schahfer and Culley 2, are not among those mechanisms.

The congressionally provided mechanisms to the federal government include Section 202(a), which allows the federal government to pursue "an abundant supply of electric energy" but only by facilitating "*voluntary* interconnection and coordination of facilities for the generation, transmission, and sale of electric energy" 16 U.S.C. § 824a(a) (emphasis added). Additionally, under certain circumstances, Section 202(b) allows the federal government to require utilities to sell or exchange energy with other facilities, but only upon application and with "no authority to compel the enlargement of generating facilities for such purposes." *Id.* § 824a(b).

Another mechanism, Section 215, provides for mandatory, nationwide reliability standards developed and enforced by a federally certified but independent entity. 16 U.S.C. § 824o(d), (e). "These standards," the Department explains, "ensure that all owners, operators, and users of the bulk-power system have an obligation to maintain system security and reliability." Ex. 52 at 7 (Department Export Authorization EA-365-C (Oct. 21, 2025)). The standards cannot be enforced by ordering generation facilities to operate, and Section 215 specifically disallows requiring the "construction of additional generation" or "enforc[ing] compliance" with "adequacy" standards. 16 U.S.C. § 824o(e), (i)(2).

The Orders purport to mandate generation based upon the Department's assessment of the bulk-power system's long-term reliability needs, a power Congress chose not to provide *any* federal agency. *See* 16 U.S.C. § 824o(e) (specifying enforcement mechanisms for federal reliability standards). And what authority Congress has authorized to implement mandatory reliability standards, it provided to FERC—not the Department. *Alcoa,* 564 F.3d at 1344. Reliability concerns in future years simply do not constitute an emergency within the meaning of Section 202(c).

Section 202(c) provides an explicitly "temporary" authority, 16 U.S.C. § 824(a)(c), preventing any interpretation of its terms that might encompass a potential longer term resource adequacy emergency. The expansive interpretation of Section 202(c) implicit in the Orders, stretching the meaning of "emergency" to cover resource

planning concerns over "years" beyond the near term, is further precluded by the Federal Power Act's express background principles of permitting "Federal regulation" only of "matters which are not subject to regulation by the States," and disavowing "jurisdiction, except as specifically provided" over "facilities used for the generation of electric energy." 16 U.S.C. § 824(a), (b)(1); *see Duke Power Co. v. Fed. Power Com.,* 401 F.2d 930, 938 (D.C. Cir. 1968) (explaining that the Federal Power Act's policy declarations are "relevant and entitled to respect as a guide in resolving any ambiguity or indefiniteness in the specific provisions which purport to carry out its intent"). The Department knows that "resource adequacy planning and capacity requirements . . . have traditionally been the domain of state regulatory commissions, NERC-certified Regional Entities, and RTOs/ISOs," *i.e.*, not the Department. Ex. 52 at 5 n.4 (Department Export Authorization EA-365-C (Oct. 21, 2025)).

Through the Orders, the Department expressly seeks to override the decisions of state, regional, and utility planners pursuant to the procedures established by Congress to ensure abundant electricity supplies and the reliability of the bulk-electric system. 16 U.S.C. §§ 824a(a)–(b), 824o. Section 202(c) does not permit that effort to transform the statutory scheme from one driven primarily by market- and state-based decision-making to one consolidating centralized federal command-and-control in the Department. And it especially does not permit that transformation in service of the Department's desire to dictate "how much coal-based generation there should be over the coming decades"—a power that the Supreme Court has found Congress "highly unlikely" to have left to agency discretion. *West Virginia v. EPA*, 597 U.S. 697, 729 (2022).

ii. The Order Does Not Demonstrate Any Long-Term Resource Adequacy Concerns that Are Not Already Being Addressed Through the Appropriate Processes Under the Federal-State Balance of Responsibilities.

In addition to being an invalid basis for Department action under Section 202(c), the Orders' discussion of long-term concerns is unreasoned and without substantial evidence, including because the Orders both overestimate the potential of a shortfall and undervalue the ability of existing processes to address any projected shortfall. The following sections examine the several bases for the Department's claim of a long-term emergency; as they explain, none of those bases provide any actual evidence that Department intervention is necessary.

a. <u>The Department Misinterprets Last Year's OMS-MISO Survey and Does Not Address this Year's Survey</u>.

One of the Department's principal citations for its claim that MISO faces a long-term shortfall is the 2025 OMS-MISO Survey. Ex. 1 at 3 (December Schahfer

Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 5 (March Schahfer Order); Ex. 159 at 5 (March Culley Order); Ex. 191 at 6 (June Schahfer Order); Ex. 192 at 5 (June Culley Order) (discussing Ex. 89 at 2, 7, 9 (2025 OMS-MISO Survey)). The Department's description of the OMS-MISO Survey is fundamentally flawed.

Broadly speaking, the purpose of the OMS-MISO Survey is to explore a wide range of potential outcomes based on current trends, to ensure that MISO is aware of the full spectrum of possibilities (including remote ones) for which it may need to secure adequate resources to ensure grid reliability. See *supra* section IV.B.3 (discussing the OMS-MISO Survey). In keeping with that purpose, the Survey applies assumptions to the bottom end of its forecasts that are extremely unlikely to reflect reality. This worst-case scenario contains extremely conservative assumptions about how much of the new generation that utilities have actively planned for is able to become operational. See Ex. 89 at 5–6 (2025 OMS-MISO Survey).

The Department creates the illusion of a long-term emergency by citing only to the bottom edge of the 2025 OMS-MISO Survey studiously ignoring the rest of the range of outcomes that were considered. In short, the Department cherry-picks the data in the Survey that confirm the Department's own biases.

No example of the Department's selective interpretation of the evidence is more obvious than the Department glossing over the fact that the 2025 OMS-MISO Survey projected a near-certain surplus of resources through at least May 2027. *See* Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 2–3 (December Culley Order); Ex. 158 at 5 (March Schahfer Order); Ex. 159 at 5 (March Culley Order); Ex. 191 at 6 (June Schahfer Order); Ex. 192 at 5 (June Culley Order). In other words, the Department's own citation provides no basis to think that Schahfer or Culley are needed for at least a year. The Department attempts to undermine this projection by calling it "potential" and suggesting that "at least 3.1 GW of additional generation capacity" would need to be added. *Id*. But this phrasing is not consistent with the 2025 study, in which the most conservative estimate concluded there will be a surplus in 2026; and the phrasing ignores the reality that new resources are built in MISO every year. 3.1 GW is fewer resources than came online per year over the past three years, and that was before utilities began accelerating new resource development in response to increasing load projections. *See* Ex. 89 at 6 (2025 OMS-MISO Survey). The Department's claim that MISO needs at least 3.1 GW of new generation is also factually incorrect because it ignores 1.4 GW of existing resources that are not currently committed to retire, but which were excluded from the 2025 Survey's projections because they were identified as having a "low certainty" of continued operation in 2026—if even one of those resources doesn't end up retiring,

it would reduce the need for new resources below 3.1 GW. Ex. 89 at 5, 7 (2025 OMS-MISO Survey).

The Department's discussion of later-year projections is even more misleading. *See* Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 5 (March Schahfer Order); Ex. 159 at 5 (March Culley Order); Ex. 191 at 6 (June Schahfer Order); Ex. 192 at 5 (June Culley Order). The 2025 OMS-MISO Survey examined MISO's resource adequacy projections using two alternate assumptions for how quickly new resources can be built. The first assumption relies on a "historical" projection. The historical projection predicts 3.5 GW of new resources per year based on a three-year historical average, plus 1.2 GW of replacement resources per year based on historical levels. The 2025 Survey's "historical" projection also assumed that only half of utilities' planned upgrades to existing facilities will actually take place. Ex. 89 at 5, 7 (2025 OMS-MISO Survey).

The second assumption relied on an "emerging" projection "based on member submittals to the 2025 OMS-MISO Survey" (*i.e.*, what utilities told OMS-MISO they are actually planning to build). The emerging projection in the 2025 OMS-MISO Survey predicted 6.2 GW of new resources per year and 2.4 GW of replacements per year. Ex. 89 at 5–6 (2025 OMS-MISO Survey).

The Department cites exclusively to the "historical" projection in the 2025 OMS-MISO Survey, ignoring the "emerging" projection entirely—but this paints an excessively pessimistic picture of the future. The 2025 Survey's estimated 1.4 to 8.2 GW deficits from 2027/28 to 2030/31 in the historical projection are more than matched by its forecast 6.4 to 11.4 GW surpluses over the same period in its emerging projection. *Id.* at 7. And again, both of these projections ignore entirely the possibility that any of the 1.4 to 3.8 GW of "potentially unavailable resources" turns out to in fact still be available. The Department's decision to ignore the half of the 2025 OMS-MISO Survey that is inconsistent with its emergency declaration has no basis in the structure of the Survey: the two projections are explicitly presented as "bookend capacity forecasts." *Id.* at 6.

By ignoring the emerging projection in the 2025 OMS-MISO Survey, the Department unreasonably fails to take into account several key factors that support that projection. First, the historical 2022 to 2024 new capacity build rate is not likely to be reflective of future build because the scope of the need for new generation only became clear in the past year or two: indeed, MISO added almost 5 GW of new resources in 2024, which was about 50 percent more than the MISO region had ever built before. *Id.* Second, the historical projection in the 2025 Survey underestimates future contributions of storage, because MISO currently only has roughly 164 MW of operational storage, meaning that the historical trend still does

not account for the coming influx of battery storage resources. And third, the 2025 Survey's historical projection's assumption that only half of utilities' "replacement" and "surplus" projects will actually occur has no actual historical basis, because these are new categories of projects that MISO therefore has no historical data on. *Id*. at 5 (indicating that replacement and surplus projects were not considered for the 2024 Survey).

The Department has also ignored other information in the 2025 OMS-MISO Survey that indicated the possibility of even more new generation coming online than either of the two projections in the 2025 Survey anticipate. For instance, the survey indicated that 54 GW of projects have a signed generator interconnection agreement but are waiting to interconnect. *Id*. at 6. A review of historic trends is instructive here: ninety percent of projects with signed generator interconnection agreements ultimately get built. See Ex. 120 at 6 n.* (2024 OMS-MISO Survey). Assuming that trend continues—and the circumstances of increasing demand provide good reason to think it will—48 GW of the total 54 GW projects currently with signed generator interconnection agreements will come online.

Additionally, as of March of last year, there were about 291 GW of projects in MISO's interconnection queue. Ex. 121 at 7:15–17 (Witmeier 2025 ERAS Testimony). MISO's historic interconnection queue completion rate is twenty-one percent, see Ex. 112 at 21:2–5 (Witmeier 2024 Queue Cap Testimony), which would equate to another 61 GW (291 GW × 21% = 61.1 GW) of new projects interconnecting from the current queue. Together, those two groups represent more than 109 GW of new resource additions that MISO could reasonably expect to come online in the next several years.

In addition, and unaccountably, the Orders do not address or even acknowledge this year's survey, which was published several weeks before the Orders. The 2026 OMS-MISO Survey shows, as discussed *supra* sec. IV.B, that for the next five years "Load Serving Entities are expected to have adequate resources to meet load reserve requirements in each zone." Ex. 186 at 3 (2026 OMS-MISO Survey). For the Summer season, MISO members project average annual resource additions of 15 gigawatts, including 11.0 gigawatts before considering the ERAS program and 4.0 annual new gigawatts through ERAS. *Id.* at 5.

b. Neither the Energy Emergency Executive Order nor the Grid Reliability Executive Order provides a valid basis to declare an emergency under Section 202(c).

The Department also cites to the Energy Emergency EO and the Grid EO claiming that there is an energy emergency and that the grid is being stressed by unprecedented demand. Ex. 1 at 3–4 (December Schahfer Order); Ex. 2 at 3

(December Culley Order); Ex. 158 at 6–7 (March Schahfer Order); Ex. 159 at 6–7 (March Culley Order); Ex. 191 at 7 (June Schahfer Order); Ex. 192 at 6 (June Culley Order). Neither of these executive orders is valid evidence of an actual energy emergency.

If the Orders' reference to a national energy emergency is meant to serve as evidence of an emergency as defined under Section 202(c), it is insufficient. Claims recited in an Executive Order are not substantial evidence supporting agency action. Substantial evidence is "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." *Chritton v. Nat'l Transp. Safety Bd.,* 888 F.2d 854, 856 (1989) (internal quotation marks omitted). And an emergency under Section 202(c) must be a specific inadequate power supply situation. See *supra* sec. V.A.1; *e.g.*, 10 C.F.R. § 205.371 (emphasis added). In the quoted passages from the Energy Emergency EO, the President offered his perspective on issues relating to the nexus between energy usage and "our Nation's economy, national security, and foreign policy." And in another presidential document cited in the Orders, the President claims, with no factual basis, that coal is essential to national defense. *See* Ex. 191 at 8 (June Schahfer Order); Ex. 192 at 7 (June Culley Order).

But these themes are simply not relevant to assessing whether an "emergency" exists under Section 202(c)(1) and the Department's regulations under 10 C.F.R. § 205.371. Thus, the Orders provide no specific evidence of inadequate generation nationwide, let alone in Indiana or even in MISO specifically. An emergency under Section 202(c) also must be imminent. See *supra* sec. V.A.1. But even the Department's other cited evidence demonstrates clearly that there is nothing imminent about even the most tenuous projected shortfalls. Nothing in the Orders refers to a shortage in the actual time period covered by the Orders.

Even if the declared national energy emergency were legitimate, a presidential declaration of an emergency does not unlock unlimited agency powers. *See Biden v. Nebraska*, 600 U.S. 477, 500-01 (2023) (presidential declaration of national emergency does not change the limitations on agency's emergency authority as written into statute). President Trump issued the Energy Emergency EO pursuant to authority from the National Emergencies Act.[13] Congress explained that the

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[13] Under the National Emergencies Act, no emergency powers unlocked by a Presidential declaration of a national emergency "shall be exercised unless and until the President specifies the provisions of law under which he proposes that he, or other officers will act." 50 U.S.C. § 1631 (emphasis added). The Energy Emergency EO does not adhere to this requirement. Ex. 92, 90 Fed. Reg. at 8,434

National Emergencies Act "is not intended to enlarge or add to Executive power. Rather, the statute is an effort by Congress to establish clear procedures and safeguards for the exercise by the President of emergency powers conferred on him by other statutes." S. Rep. No. 94-1168, 3 (1976), (emphasis added). But Section 202(c)'s authority is not triggered by a Presidential emergency declaration; the statute requires that "the Commission determine[] that an emergency exists." 16 U.S.C. § 824a (emphasis added).[14] Thus, the burden is on the Department to demonstrate that there is an emergency pursuant to the narrow language of Section 202(c); simply pointing to the Energy Emergency EO or the Grid Reliability EO without providing actual evidence that an emergency exists is unreasoned.

c. The Department's July 2025 Resource Adequacy Report does not substantiate its claim of a long-term resource adequacy shortfall.

The Orders also briefly cite to the Department's July 2025 Resource Adequacy Report as evidence of a potential emergency years down the road. Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 4 (December Culley Order); Ex. 158 at 7 (March Schahfer Order); Ex. 159 at 7 (March Culley Order); Ex. 191 at 8 (June Schahfer Order); Ex. 192 at 7 (June Culley Order) (citing Ex. 96 (July 2025 Resource Adequacy Report)). But that Report does not credibly project conditions in 2030 because of its many inaccurate assumptions and methodological errors.[15] Moreover, that Report offers no actual evidence of any near-term shortfall.

Most glaringly, the Report overestimates demand growth and expected facility retirements while underestimating the likelihood of new entry. This biases the entire report in the direction of over-identifying resource adequacy concerns. Ex. 113 at 21–25 (Inst. Pol'y Integrity Report); see also Ex. 68 at 7 (Grid Strategies Sept. Report) (explaining that the July 2025 Resource Adequacy Report relies on load growth and capacity retirement assumptions that are "drastically higher" than those provided by the U.S. Energy Information Administration, the arm of the

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(Energy Emergency EO) (generically directing agencies to "identify and exercise any lawful emergency authorities available to them, as well as all other lawful authorities they may possess, to facilitate the . . . generation of domestic energy resources.").

[14] The Department has exercised certain powers under Section 202(c) since the DOE Organization Act of 1977. 42 U.S.C. § 7151(b).

[15] A group of organizations including several of the PIOs here have raised several concerns with this Report in a separate rehearing request. See generally Ex. 99 (RFR of July Resource Adequacy Report).

Department tasked with "independent statistics and analysis"); Ex. 122 at 2–3 (GridLab Report) (noting that the July 2025 Resource Adequacy Report fails to account for the potential flexibility of data center load additions; that the Report assumes double the retirements and only a quarter of the firm resource additions assumed by the Energy Information Administration; and that the report ignores "fast-track" interconnection processes recently approved by FERC for multiple RTOs); Ex. 99 at 34-35 (PIOs' RFR of July Resource Adequacy Report) (citing multiple expert reports and initiatives demonstrating the potential for flexibility of large data center loads, including Ex. 123 (Duke University Rethinking Load Growth Study)).

The Report also "departs from best [modeling] practices by using a deterministic modeling rather than a probabilistic approach," and thereby fails to account for necessary uncertainties. Ex. 113 at 19 (Inst. Pol'y Integrity Report). And in many places the Department simply does not explain its own methodology. The report states that its model is derived from NERC's Interregional Transfer Capability Study, which is focused on the ability of the transmission system to transfer power between regions. Ex. 96 at 2 (July 2025 Resource Adequacy Report). However, the report inexplicably excludes new transmission projects from its analysis, ignoring that transmission improvements can be the most cost-effective way to improve grid reliability. The Department's report also appears to misunderstand certain principles of statistical reasoning, calling out PJM for failing loss-of-load criteria under one realization of a possible weather year that would include Winter Storm Elliott, without considering that a system's LOLE is averaged across all simulated weather years. Ex. 113 at 19 (Inst. Pol'y Integrity Report); Ex. 96 at 7, 9, 27 (July 2025 Resource Adequacy Report). The Department also added more "perfect capacity" (in megawatts) within its modeling than actually needed to bring regions to its targeted Normalized Unserved Energy level. Ex. 113 at 26 (Inst. Pol'y Integrity Report); Ex. 96 at 19, 27, 30, 32, 40 (July 2025 Resource Adequacy Report). These analytical failings in and of themselves disqualify the report as a viable source of evidence for an emergency finding.

The lack of evidence for a long-term emergency is underscored by the fact that the Department's own analysis premises a resource adequacy shortfall on a type of demand increase (large load buildout), Ex. 96 at 2–3, 15–17 (July 2025 Resource Adequacy Report), that the report goes on to admit would likely never actually be allowed to destabilize the grid. Specifically, the report notes that its analysis "is not an indication that reliability coordinators would allow this level of load growth to jeopardize the reliability of the system." *Id*. at 14. In other words, even taking the report at face value, it does not identify a shortfall of a type and nature that could ever justify invocation of the Department's Section 202(c) emergency authority. At best, the report highlights that data centers cannot be built at projected rates

unless new generation is built, which is far from the type of emergency situation that could ever provide the basis for a Section 202(c) order.

Finally, on its opening page, the report acknowledges that its analysis is general in nature, looking at the country as a whole, and that the various "entities responsible for the maintenance and operation of the grid" have information "that could further enhance the robustness of reliability decisions" in the sections of the grid they administer. *Id.* at i. This type of generalized analysis based on incomplete information is simply insufficient to justify a Section 202(c) emergency finding for MISO or any other specific region.

d. MISO has designed its ERAS proposals to address claimed shortfalls and has not suggested that any further generation/capacity is needed.

There is one place where MISO has projected a distant resource adequacy need: in the course of requesting FERC approval for its proposed Expedited Resource Addition Study, which FERC approved in July 2025. Ex. 90 at 6, 13–17 (MISO ERAS Transmittal Letter); Ex. 91 (MISO ERAS Decision). But, as explained above, sec. IV.B.3, that projected need spurred MISO to initiate a process that will add at least 28 GW (and likely more) of new capacity to MISO's system over the next several years.

The Department minimizes the import of this approval by suggesting that the projects won't reach commercial operation for at least three years and could be further delayed by supply chain constraints. Ex. 1 at 3 (December Schahfer Order); Ex. 2 at 3 (December Culley Order); Ex. 158 at 6 (March Schahfer Order); Ex. 159 at 6 (March Culley Order); Ex. 191 at 7 (June Schahfer Order); Ex. 192 at 5–6 (June Culley Order). But the Department's first statement is factually incorrect—projects that are selected for ERAS could begin operation sooner than three years from the application date; they just have up to six years of leeway—and its second statement is far too conjectural to provide a basis for an emergency declaration. Ex. 91 at P 84 (MISO ERAS Decision). The Department cannot defensibly declare an emergency justifying use of its 202(c) authority based on a concern that the expedited interconnection process MISO has established specifically to meet projected resource adequacy needs won't work—absent substantial and specific evidence of that fact, it is pure conjecture.

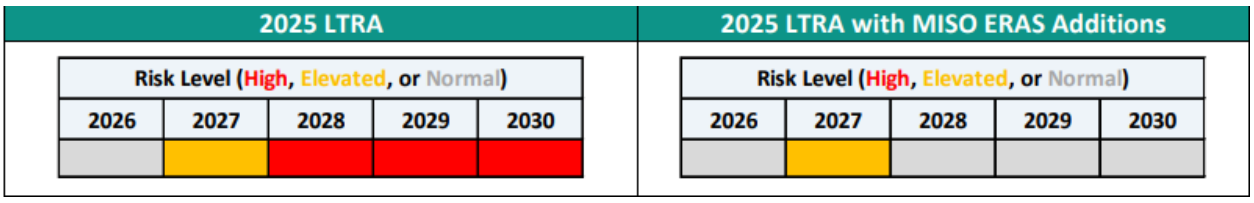
e. The North American Electric Reliability Corporation's Recent Assessment Does Not Support the Claimed Long-Term Emergency.

The Orders' reliance on the 2025 Long-Term Reliability Assessment published in January 2026 by NERC as evidence supporting the claimed emergency is also inapposite. Ex. 191 at 5 (June Schahfer Order); Ex. 192 at 4 (June Culley Order).

The report discloses on its face that, for example, it took no consideration of the ERAS interconnection process. Ex. 177 at 8, 15 (NERC Jan. 2026 LTRA). "If ERAS projects come in as currently planned, the projected reserve margin shortfall would be eliminated." *Id.* at 15. The report also lists no elevated risk for the year 2026, which covers the time period of the June Schahfer and Culley Orders. *Id.* at 8. The Department could have and should have accounted for those factors. The report also acknowledges that state regulators and utilities are "statutorily required to ensure reliability" and generally work to align large load additions, generator retirements, and generator additions. *Id* at 15.

Expert analysis of the Long-Term Reliability Assessment reveals other shortcomings as well. The Assessment failed to consider *any* generation which has begun, but not yet completed system studies, Ex. 166 at 11 (Grid Strategies LTRA Review). Failing to include even a fraction of these resources currently in the queue is unrealistic, and improperly suggests resource shortfalls by wholesale ignoring the resources that will add additional capacity to the system. A more realistic analysis that discounts resources in the study process by historic dropout rates found that MISO is on pace to add enough generation to maintain resource adequacy. *Id.* at 12. The NERC analysis also did not consider non-firm imports via interregional transmission lines that have been available during historical grid stress events, including during the recent Winter Storm Fern the Department mentions. *Id.* at 16. Likewise, the Assessment did not account for chip-industry manufacturing limitations in its forecast of data center load, or how data center load flexibility could decrease capacity demands of data center expansion. *Id.* at 19–24. The result of these oversights is an assessment which likely overstates risk. *Id.* at 31 (showing the MISO region as being on track to meet capacity needs in 2030).

And in fact, weeks prior to the Department's issuance of the Orders, NERC updated the LTRA and revised the risk level assigned to MISO. Ex. 187 at *passim* (NERC 2025 LTRA Update). The update addresses the impact of the ERAS projects. *Id.* at 1. The update substantially reduces the risk level for the MISO region, as shown in the excerpted figure below.



Id. at 1.

The Orders, therefore, wrongly assert that NERC assesses MISO as facing high risk. The Department should have accounted for all of these factors, and its failure to do so is unreasoned.

f. The Generic Testimony of a Single MISO Executive on which the Department Relies Is Contradicted by Numerous More Concrete Statements by MISO.

Finally, the Orders cite to testimony by Jennifer Curran, a current MISO executive, that speaks in general terms about MISO's need for capacity. Ex. 191 at 8–9 (June Schahfer Order); Ex. 192 at 7–8 (June Culley Order) (citing Ex. 178 (Curran Testimony)). As an initial matter, Ms. Curran's testimony is sufficiently vague that it is open to any number of interpretations. Her testimony provides no timeline for the risk she communicates, nor does it state how great the reliability risk is, or how much bigger it could get, from the various systemic trends she discusses. *See* Ex. 178 at 4–6 (Curran Testimony). This generic testimony is taken from an opening statement to Congress; it is also several steps removed from the concrete, tangible, and specific evidence that is necessary for the Department to find that there is a Section 202(c) emergency.

The Orders' treatment of Ms. Curran's testimony is a prime indicator of unreasoned decision-making because it misrepresents aspects of the testimony, cherry-picks only favorable statements while omitting unfavorable statements, and wholly ignores related evidence undercutting the Department's position. For example, the Orders misrepresent Ms. Curran's testimony in suggesting she "acknowledged the Nation's current energy crisis." Ex. 191 at 8–9 (June Schahfer Order); Ex. 192 at 7–8 (June Culley Order). In fact, Ms. Curran never said or implied that there is any crisis or emergency. Moreover, the Department conspicuously omits elements of her testimony cutting against the Department's invocation of Section 202(c) authority. For example, Ms. Curran testified that "[i]mproving existing market and operations processes tool is a cost-effective and timely way to improve reliability in an efficient manner." Ex. 178 at 7 (Curran Testimony). She further testified that the risks of generation plant retirements can be addressed by allowing *local* reliability requirements to determine the pace of retirements. *Id.* Ms. Curran's recommendations for future action do not include the Department's use of Section 202(c) orders, nor do they include coal-fired power generation. *See id.* at 9–10.

The Orders also fail to mention or consider statements by other MISO executives rebutting the Department's conclusion that there is a resource adequacy deficiency. For instance,

> In a statement, MISO said it will "continue coordinating with Consumers Energy to comply with the [Campbell 202c Orders]." But MISO again stressed that J.H. Campbell did not clear the planning resource auction and is unnecessary for resource adequacy in the 2025/26 planning year. "MISO's 2025–2026 Planning Resource Auction indicated adequate resources to meet anticipated demand. . . .," MISO spokesperson Brandon Morris said in a statement to RTO Insider.

Ex. 117 (RTO Insider Article on August Order). The Orders further ignore testimony from MISO's Internal Market Monitor at a FERC technical conference that MISO "[was] more than adequate" for the Summer of 2025 and that the IMM has no substantial resource adequacy concerns "in the near term." Ex. 35 at 2 (Patton MISO Comments). The Internal Market Monitor was even more candid when he stated in March 2026 with respect to the Orders that, "It's pretty easy to come the conclusion that none of these orders are actually needed." Ex. 179 at PDF p. 2 (RTO Insider March 2026 Article). Finally, the Orders fail to consider that MISO has never requested that a Section 202(c) order be issued to Schahfer or Culley.

3. The Orders Do Not, and Could Not, Provide any Valid Evidence or Reasoned Decision-Making to Support Their Stated Near-Term Emergency Conditions.

The claimed near-term emergency in the Orders is unspecific. And none of the sources cited in the Orders, separately or together, establishes factual circumstances that come close to a near-term emergency or otherwise meet the definition of "emergency" that permits Departmental action under Section 202(c). 16 U.S.C. § 824a(c)(1). The Orders also rely on these sources in a vacuum, failing to consider many other analyses of which the Department is aware or should be aware. The Orders' near-term emergency determination is unjustified, unreasoned, and not based on substantial evidence.

i. The Described Concerns Are Insufficiently Specific and Certain to Meet the Statutory Definition of an Emergency.

The Orders gesture at the possibility of electricity shortfalls in the "near" term, but offer no plausible evidence of such shortfalls. See *infra* sec. V.A.3.ii.

That failure to adduce plausible evidence to one side, the generalized, speculative risks described by the Orders are neither specific nor certain enough to qualify as an "emergency" within the meaning of Section 202(c). 16 U.S.C. § 824a(c). A notional suggestion of some possible shortfall, which might (or might not) require generation from Schahfer or Culley 2, is not a "specific inadequate power supply

situation" enabling the use of the Department's Section 202(c) authority. 10 C.F.R. § 205.371.

The Department does not find that there will be a single supply shortfall during the entirety of each 90-day term of the four recently issued orders. Ex. 1 at *passim* (December Schahfer Order); Ex. 2 at *passim* (December Culley Order); Ex. 158 at *passim* (March Schahfer Order); Ex. 159 at *passim* (March Culley Order); Ex. 191 at *passim* (June Schahfer Order); Ex. 192 at *passim* (June Culley Order). Nor does the Department point to any specific circumstances even giving rise to a risk of such a shortfall. Ex. 1 at *passim* (December Schahfer Order); Ex. 2 at *passim* (December Culley Order); Ex. 158 at *passim* (March Schahfer Order); Ex. 159 at *passim* (March Culley Order); Ex. 191 at *passim* (June Schahfer Order); Ex. 192 at *passim* (June Culley Order). For the duration of the six Orders—from December 23, 2025 through March 23, 2026, March 24, 2026 through June 21, 2026, and June 22, 2026 through September 19, 2026—the Department's near-term justification amounts to the simple assertion that "MISO's year-round resource adequacy concerns are well documented." *See* Ex. 1 at 1 (December Schahfer Order); Ex. 2 at 1 (December Culley Order); Ex. 158 at 2 (March Schahfer Order); Ex. 159 at 2 (March Culley Order). Ex. 191 at 3 (June Schahfer Order); Ex. 192 at 2 (June Culley Order). At most, this conclusory statement asserts the possibility that some resource inadequacy might (or might not) emerge somewhere in MISO—but that does not, and cannot, demonstrate that "an emergency exists by reason of a sudden increase in the demand for electric energy" or an identified "shortage of electric energy" or of "facilities for the generation or transmission of electric energy." 16 U.S.C. § 824a(c)(1); *see also Louisville & N.R. Co. v. Sullivan*, 617 F.2d 793, 795 (D.C. Cir 1980) (explaining that where statute permits emergency orders based on determination that a "facility or piece of equipment [is] in unsafe condition, the agency may not issue order based on "a generalized poor safety record" without showing of "particular" safety hazard). The Orders do not describe or provide support for—even taken on their own terms—any imminent, specific, or certain electricity shortfall.

The Orders' reference to the NERC 2026 Summer Reliability Assessment, Ex. 191 at 5 (June Schahfer Order); Ex. 192 at 4 (June Culley Order), is likewise neither specific nor certain enough to substantiate an "emergency" within the meaning of Section 202(c). The Assessment says only that increased data center load "*may* lead to increased reliability risk" at an indeterminate point in the future "if resource additions cannot keep pace with rising load forecasts." Ex. 189 at 16 (NERC 2026 Summer Reliability Assessment) (emphasis added). But NERC does not hedge when noting that MISO faces a "normal" seasonal risk profile in which there are "[s]ufficient operating reserves expected." *Id.* at 3. And the report notes

that MISO's reserve margin is growing, suggesting that all current signs show that resource additions *are* keeping pace with load growth. *Id.* at 45.

The vagaries offered by the Department are not enough; the Orders fail to describe an "emergency" within the meaning of Section 202(c).

ii. The Claimed Shortfall Is Unreasoned and Not Supported by Substantial Evidence.

The Orders fail to employ reasoned decision-making and fail to offer substantial evidence of an emergency in the Summer 2026 season (which is most of the period it covers) or the upcoming Fall 2026 season. Instead, the Orders review and recite information from several MISO documents, misinterpreting and misrepresenting the materials to allege a resource adequacy crisis that simply does not exist. The Orders also misstate grid conditions during the recently completed Winter 2025–2026 season.

The first example of this flawed reasoning is the Orders' statement, by reference to last year's capacity auction, "'new capacity additions were insufficient to offset the negative impacts of decreased accreditation, suspensions/retirements and external resources' in the northern and central zones, which include Indiana." Ex. 1 at 2 (December Schahfer Order) (quoting Ex. 31 at 13 (MISO 2025–26 Auction Results)); Ex. 2 at 2 (December Culley Order) (quoting same); Ex. 158 at 5 (March Schahfer Order) (quoting same); Ex. 159 at 5 (March Culley Order) (quoting same); Ex. 191 at 5–6 (June Schahfer Order) (quoting same); Ex. 192 at 4–5 (June Culley Order) (quoting same). As in prior Section 202(c) orders last year, *e.g.*, Ex. 124 at 2 (November Campbell Order), the Department fails to note that this statement referred to *offers* rather than auction-cleared supply, and particularly only to the netting of additions and subtractions causing total North/Central offers to decrease in absolute terms from Summer 2024 to Summer 2025. *See* Ex. 31 at 13 (MISO 2025–26 Auction Results). The Department also fails to acknowledge that during last year's auction, overall resource offerings in MISO North/Central were sufficient relative to the Reserve Margin Requirement, which also decreased from 2024 to 2025. *Compare* Ex. 84 at 16 (MISO 2024–25 Auction Results) (showing a Summer 2024 Reserve Margin Requirement of 100,710 MW in Zones 1–7), *with* Ex. 31 at 18 (MISO 2025–26 Auction Results) (showing a Summer 2025 Reserve Margin Requirement of 99,770.5 MW in Zones 1–7).

These metrics also track the ultimate results of MISO's 2025–2026 Planning Auction, which, as explained above, *supra* secs. IV.A.2.ii, IV.B, resulted in MISO securing more resources than it determined were necessary to ensure resource adequacy. In short, it was clear in April 2025, when MISO released its 2025–2026

Planning Auction results, that the MISO system had no resource adequacy crisis this Spring even after accounting for announced plant retirements, including the Schahfer and Culley retirements. The Orders fail to acknowledge these critical facts undercutting the Orders' emergency determination.

Meanwhile, the Orders neglect to address this year's Planning Auction. MISO accepted offers in March of this year and announced the Planning Auction results in April, with updated data posting in May, weeks before the Orders. Ex. 170 at 5-6 (MISO 2026–2027 Planning Auction Timeline); Ex. 185 at 1 (MISO 2026–27 Auction Results); Ex. 185A at 1 (MISO 2026–27 Auction Results (Original)). MISO's auction results demonstrate continued satisfaction of all resource adequacy goals and even an expanding surplus of supply compared to demand, relative to last year's auction. In this Summer, for instance, whereas MISO targeted a 7.9% reserve margin (*i.e.*, procuring 107.9% of the resources needed to meet expected demand), the auction cleared 111.4% of the resources needed to meet expected demand. *Id.* at 4.

The Orders also gesture to various recent reports in which MISO has forecasted an increasing resource adequacy risk in non-Summer seasons. See Ex. 1 at 1–2 (December Schahfer Order); Ex. 2 at 1–2 (December Culley Order); Ex. 158 at 4 (March Schahfer Order); Ex. 159 at 4 (March Culley Order); Ex. 191 at 4–5 (June Schahfer Order); Ex. 192 at 3–4 (June Culley Order). However, the Department does not appear to have carefully examined what MISO was actually saying in any of these materials.

First, the Department quotes from MISO's 2021 capacity accreditation filing, in which MISO described a shift of reliability risks "from 'Summer only' to a year-round concern," apparently for the proposition that the Winter and Spring seasons also experience meaningful systemic risks. Ex. 1 at 1 (December Schahfer Order) (quoting Ex. 77 at 3 (MISO 2021 Transmittal Letter)); Ex. 2 at 1 (December Culley Order) (quoting same); Ex. 158 at 2 (March Schahfer Order) (quoting same); Ex. 159 at 2 (March Culley Order) (quoting same); Ex. 191 at 3 (June Schahfer Order) (quoting same); Ex. 192 at 2 (June Culley Order) (quoting same). The relevant graph in the 2021 Transmittal Letter shows an incidence of MaxGen events across all four seasons from 2014 through 2022 but says nothing about how serious these events were. *See* Ex. 77 at 3 (MISO 2021 Transmittal Letter). A simple review of MISO's actual MaxGen events would have revealed that none of the Winter events exceeding the "MaxGen Warning" level ascended to the level (MaxGen Event Step 5) that entails manual shedding of load. Ex. 32 at *passim* (MISO Emergency Declarations); see *supra* sec. IV.A.3, IV.B.1. In other words, recent winter storms have presented a challenge for MISO—but even the most severe episodes in recent years have failed to cause actual load shedding.

And when placed in context unexamined in the Order, the 2021 letter comes nowhere near supporting the notion of a year-round resource adequacy crisis. In fact, MISO actually expected to procure enough resources during non-Summer seasons to be ten times more protective than the industry standard. When MISO first introduced its new seasonal resource adequacy structure to FERC, its expert described its modeling of seasonal LOLE as follows:

> MISO proposes to round [Loss of Load Expectation] targets up to a minimum of 0.01 day per year for any Season(s) with LOLE less than 0.01 day per year and maintain LOLE targets for the Seasons with LOLE greater than 0.01 day per year.

Ex. 198 at 11:12–15 (McFarlane Testimony). In other words, MISO contemplated that its Monte Carlo modeling exercise might predict that MISO experiences *less than a hundredth* of a day of lost load every year in non-Summer seasons, which is equivalent to less than a single day of lost load *every 100 years*. FERC approved this aspect of MISO's seasonal modeling (together with the remainder of MISO's seasonal capacity construct) the following year, indicating its general agreement. 180 FERC ¶ 61,141 (cited *supra* in sec. IV.A.2.i)

Next, the Orders cite MISO's 2023 Attributes Roadmap, which according to the Orders established that "by the summer of 2027, there will be an equal loss of load risk in both the summer and fall seasons" and "the risk of loss of load in the winter and spring seasons, although not as high as in the summer or fall, will nevertheless increase over time." Ex. 1 at 2 (December Schahfer Order) (citing Ex. 85 at 11 (MISO Attributes Roadmap)); Ex. 2 at 1–2 (December Culley Order) (citing same); Ex. 158 at 3 (March Schahfer Order) (citing same); Ex. 159 at 3 (March Culley Order) (citing same); Ex. 191 at 4 (June Schahfer Order) (citing same); Ex. 192 at 3 (June Culley Order) (citing same). But again, the Orders fail to discuss the magnitude of risk at issue. The implicated 2027 graph on page 11 of the MISO Attributes Roadmap identifies loss of load risks for Winter 2027–2028 that peak around hour 20 with around 150 hours of expected lost load, Ex. 85 at 11 (MISO Attributes Roadmap), but those 150 hours (from 3,750 runs of the model)[16] correspond to a lower risk than the industry-standard acceptable risk target. Specifically, the LOLE risk is .05 days/year, or 50% of the industry-standard target of 0.1 days per year. Ex. 86 at 7, 19 (MISO Attributes Roadmap Technical Appendix); *see generally* Ex. 10 at 2–3 (Grid Strategies June Report) (discussing

[16] For a given season, 15 weather years and 250 random outage samples per weather year are modeled. Ex. 86 at 7 (MISO Attributes Roadmap Technical Appendix). 15 × 250 = 3,750.

LOLE risk targets). The Department thus fails to make a reasoned determination and fails to account for record evidence detracting from its determination, because its discussion of "equal" risk fails to mention that the absolute risk in both seasons remains extremely low.

Furthermore, the graph that the Orders cite in the MISO Attributes Roadmap does not even refer to the present Summer season. *See* Ex. 85 at 11 (MISO Attributes Roadmap). Instead, it refers to projected risk in Winter 2027–28 and makes clear that there was minimal such risk in Winter 2023–24; but it is entirely silent as to the risk profile in Summer 2026. *See id.* As further discussed below, the Orders may not use the possibility of risks in future seasons as evidence that actual risks exist in the current season—particularly where, as here, there is concrete evidence demonstrating that no such risk exists.

Finally, the Orders gesture to MISO's 2024 Reliability Imperative Report, which mentions "risks in non-summer months that rarely posed challenges in the past." Ex. 1 at 2 (December Schahfer Order) (quoting Ex. 87 at 12 (MISO's Response to the Reliability Imperative); Ex. 2 at 2 (December Culley Order) (quoting same); Ex. 158 at 4 (March Schahfer Order) (quoting same); Ex. 159 at 4 (March Culley Order) (quoting same); Ex. 191 at 4–5 (June Schahfer Order) (citing same); Ex. 192 at 3–4 (June Culley Order) (citing same). But the "Response to the Reliability Imperative" offers no specific information about non-Summer risks other than its qualitative discussion of recent winter storms. *See generally* Ex. 87 at *passim* (MISO's Response to the Reliability Imperative).

Additionally, the Department's own export authorizations undercut the claimed emergency. The Department has continued to grant entities the authority to export power from parts of MISO into Canada. *See* Department Export Authorizations Library, https://www.energy.gov/oe/export-authorization-library (last visited Apr. 19, 2026); *e.g.*, Ex. 2-52 at 11–12 (Department Export Authorization EA-365-C (Oct. 21, 2025)) (authorizing exports from multiple interconnection points in Michigan and Minnesota).

Under Section 202(e), the Department shall approve an authorization to export power "unless, after opportunity for hearing, it finds that the proposed transmission would impair the sufficiency of electric supply within the United States or would impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of the Commission." 16 U.S.C. § 824a(e). The Department interprets the "sufficiency" prong of Section 202(e) "to mean that sufficient generating capacity and electric energy must exist such that the export could be made without compromising the energy needs of the exporting region, including serving all load obligations in the region while maintaining appropriate reserve

levels." Ex. 2-52 at 3–4 (Department Export Authorization EA-365-C (Oct. 21, 2025)). To address this prong, the Department "examines whether existing electric supply is available via market mechanisms, and whether potential reliability issues linked to supply problems are mitigated by reliability enforcement mechanisms." *Id.* at 4. The Department interprets the "coordination" prong of Section 202(e) "primarily as an issue of the operational reliability of the domestic electric transmission system" and, "[a]ccordingly, the export must not compromise transmission system security and reliability." *Id.*

The Department's authorizations to export power from MISO (and other areas) to Canada demonstrate the false basis of the Orders' emergency determination. For instance, in a recent export authorization, the Department explains why allowing exports to Canada will not impair the sufficiency of domestic electric supply. "From an economic perspective," which the Department explains regards "the supply available to wholesale market participants," the Department "finds that the wholesale energy markets are sufficiently robust to make supplies available to exporters and other market participants serving United States regions along the Canadian and Mexican borders." *Id.* at 4. And from a reliability perspective, through which the Department "focuses on preventing problems that could result from inadequate supplies," the Department says nothing about possible inadequate supplies. *Id.* Instead, the Department recounts the multi-layered and "comprehensive" reliability processes that "ensure[] that bulk-power system owners, operators, and users have a strong incentive both to maintain system resources and to prevent reliability problems that could result from movement of electric supplies through export." *Id.* at 5–6; *see also id.* at 7–8 (explaining further some authorities of balancing authorities and reliability coordinators).

The Orders do not reconcile the Orders' emergency determination with the export authorizations' findings that markets in the area are sufficiently robust to make supplies available, and that multi-layered and comprehensive reliability processes incentivize maintenance of system resources. The Orders are thus unreasoned and not based on substantial evidence.

Notably, while the Orders attempt without justification to sow doubt about resource adequacy in non-summer seasons generally, they provide no evidence indicating any actual risk of inadequate supply in the Summer 2026 season, which is the time period mainly at issue in the Orders. This is a staggering abdication of the Department's obligation to provide sound evidentiary backing for its emergency declarations and further confirms that there is no remotely sound reason to be concerned about resource adequacy shortfalls in the near term.

Finally, as explained above in Section IV and in the Konidena April Declaration, Ex. 173 at 8, the Department erroneously claims that MISO's conservative operations during Winter Storm Fern "demonstrate" MISO's resource adequacy concerns. It is improper to draw broad conclusions about the stability of the grid from late winter to mid-spring based on a single event in January (which ignores the significant variation in conditions that grid operators face in different seasons). Moreover, MISO's operation of the grid during Winter Storm Fern maintained full electric service to all customers using exactly the resources (power imports, demand-side resources, and maximum generation alerts) that Public Interest Organizations have explained are designed for this purpose and intended to be used in such circumstances. MISO maintained grid reliability during the entirety of Winter Storm Fern even in the face of unexpected software and mechanical issues that interfered with its operations, and its standardized responses to the event served their purpose. In spite of experiencing these essentially software issues, MISO was still able to avoid load shed by calling on imports from neighboring regions and from its own load-modifying resources. Ex. 199 at 8–12 (MISO Winter Storm Fern Summary). The capacity of the generators subject to the Department' s 202(c) orders in MISO—Schahfer, Culley 2, and Campbell—were not needed to provide capacity even during the highest-load hours of Winter Storm Fern. S*ee* Ex. 173 at 8 (Konidena April Declaration).

B. The Orders Are Not Based on Reasoned Decision-Making and Substantial Evidence in Imposing Requirements to Best Meet the Claimed Emergency and Serve the Public Interest.

The Orders determine that additional dispatch of Schahfer and Culley 2 are necessary to best meet the purported emergency and serve the public interest. But the Orders provide no rational basis for that determination. The Orders do not address the limitations of either the Schahfer or Culley 2 plant, or explain how, in light of those limitations the Plants could even meet the claimed emergency. In fact, both Plants are unlikely to be able to do so. The Orders do not examine the expense of running any of the units or the associated environmental damage, factors which cause additional dispatch of the plant to harm, rather than serve, the public interest. And the Orders do not address readily available and obvious alternatives which, in point of fact, would better meet the claimed emergency. The Orders also fail to consider how they are causing economic damage by, *inter alia*, crowding out otherwise competitive resources, disrupting planning, and creating policy-driven uncertainty. See Ex. 137 at PDF pp. 2–3 (R Street Institute Commentary: *DOE "Zombies" Are Eating Competitive Power Markets*). Consequently, and for the reasons further discussed in the following subsections, the Order is without support in the record, unreasoned, and unlawful. *Allentown Mack*, 522 U.S. at 374; *State*

Farm, 463 U.S. at 42–43, 51; *Burlington Truck Lines*, 371 U.S. at 168; *Butte Cnty.*, 613 F.3d at 194.

1. Legal Framework: Section 202(c)(1) Authorizes the Department to Require Only Generation that Best Meets the Emergency and Serves the Public Interest.

Section 202(c)(1) authorizes the Department to impose only those requirements that (i) "best" (ii) "meet the emergency and" (iii) "serve the public interest." 16 U.S.C. § 824a(c)(1).

The term "best" demands a comparative judgment that there are no better alternatives. The word "best" is inherently a comparative term and means "that which is 'most advantageous.'" *Entergy Corp. v. Riverkeeper, Inc.*, 556 U.S. 208, 218 (2009) (*quoting* Webster's New International Dictionary 258 (2d ed.1953)); *cf. Sierra Club v. Env't. Prot. Agency*, 353 F.3d 976, 980, 983–84 (D.C. Cir. 2004) (explaining that statutory "best available control technology" requirement demands sources in a category clean up emissions to the level that peers have shown can be achieved). Consequently, the Department must, at minimum, consider alternatives and evaluate whether and to what extent a given alternative addresses the emergency and serves the public interest, including deficiencies associated with the alternative.[17]

The Department's obligation to exercise reasoned decision-making further requires consideration of alternatives. The Department need not consider every conceivable alternative, but it must consider alternatives within the ambit of the regulatory context as well as alternatives which are significant and viable or obvious. *See Dep't of Homeland Sec. v. Regents of the Univ. of Calif.*, 591 U.S. 1, 30 (2020); *Motor Vehicle Manufs. Ass'n of the U.S. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 51 (1983); *Nat'l Shooting Sports Found., Inc. v. Jones*, 716 F.3d 200, 215 (D.C. Cir. 2013). Intervenors and the public may also introduce information that requires the Department to evaluate alternatives and reconsider its decision to impose or maintain a requirement. *See, e.g.*, *Chamber of Com. of the U.S. v. Secs. & Exch. Comm'n*, 412 F.3d 133, 144 (D.C. Cir. 2005) (evaluating agency failure to consider alternative raised by dissenting Commissioners and introduced by

[17] To be sure, the nature and extent to which the Department must consider alternatives depends on the emergency. An emergency that truly requires the Department to act within hours, for instance, permits a more abbreviated consideration than an emergency for which the Department has days to decide.

commenters); *cf.* 10 C.F.R. § 205.370 (stating ability to cancel, modify, or otherwise change an order).

The Department's regulations and practice identify relevant alternatives for its consideration. The regulations specify information the Department shall consider in deciding to issue an order under Section 202(c), and require an applicant for a 202(c) order to provide the information. 10 C.F.R. § 205.373. The specified information includes "conservation or load reduction actions," "efforts . . . to obtain additional power through voluntary means," and "available imports, demand response, and identified behind-the-meter generation resources selected to minimize an increase in emissions." *Id.* §§ 205.373(f)–(h); Ex. 9 at 4 (DOE Order No. 202-22-4).

The Department may then choose only the best alternative. The best alternative is the one that is most advantageous for meeting the stated emergency and serving the public interest.

The statutory command to take only measures that serve the public interest, including with respect to environmental considerations, further constrains the Department's authority. The public interest element demands that the Department advance, or at least consider, the various policies of the Federal Power Act. *Cf. Wabash Valley Power Ass'n*, 268 F.3d at 1115 (interpreting the "consistent with the public interest" standard in Section 203 of the Federal Power Act); *see Gulf States Utils. Co. v. Fed. Power Comm'n*, 411 U.S. 747, 759 (1973); *California v. Fed. Power Comm'n*, 369 U.S. 482, 484–86, 488 (1962). Primary policies of the Federal Power Act include protecting consumers against excessive prices; maintaining competition to the maximum extent possible consistent with the public interest; and encouraging the orderly development of plentiful supplies of electricity at reasonable prices. *NAACP v. Fed. Power Comm'n*, 425 U.S. 662, 670 (1976) (orderly development); *Otter Tail Power Co. v. United States*, 410 U.S. 366, 374 (1973) (maintaining competition); *Pa. Water & Power Co. v. Fed. Power Comm'n*, 343 U.S. 414, 418 (1952) (excessive prices). And because Section 202(c) expressly protects environmental considerations, these are part of the public interest element too. *See NAACP*, 425 U.S. at 669 ("[T]he words 'public interest' . . . . take meaning from the purposes of the regulatory legislation.").

2. The Orders do not address the generators' unreliability or explain how, in light of that unreliability, the generators could meet the claimed emergency.

The Orders are unreasoned and not based on substantial evidence in requiring the Plants' availability and operation while failing to address the Plants' unreliability.

Schahfer is old and creaky, with significant reliability issues, as discussed above in section IV.C.3.i. In anticipation of its retirement, NIPSCO has deferred maintenance on Units 17 and 18, further exacerbating the reliability of the plant. These reliability issues raise significant doubt that Schahfer is capable of reliable operation such that it could meet the claimed emergency. In fact, forcing the unreliable Schahfer to continue operating actually threatens grid reliability.

Both Schahfer Unit 17 and Unit 18 have seen repeated and significant unforced outages in recent months, reflecting the units' deteriorating state. In 2024, NIPSCO's equivalent forced outage rate ("EFOR"), which represents the percentage of time (in hours) a unit was unable to generate power for reasons other than planned maintenance, was 18.8% and 13.2% for Schahfer Units 17 and 18 respectively. Ex. 4 at 5 (Powers January Declaration). These rates are substantially worse than the national average for coal-fired units of 12 percent. *Id.*; *see* Ex. 40 at 59 (NERC 2024 Reliability Report). This is driven in part by the fact that the units are so uneconomical. As NIPSCO explains,

> "NIPSCO's coal EFOR has been significantly affected by changing power markets, which has changed the economical dispatch for coal. Infrequent operation for years, which imposes high thermal stresses on a unit, leading to an increase in forced and maintenance outage hours, followed by an increase in the demand for operating hours later in the year, exacerbates the issues."

Ex. 13 at 21 (NIPSCO Performance Metric Collaborative Update).

NIPSCO's coal units are both dilapidated and expensive enough that their net capacity factor—that is, the percentage of a unit's nameplate capacity that it actually produces considering both outages and how often it is scheduled to dispatch—was at 25% for 2024. *Id.* at 22.

The units' outage rate in 2025 was similarly dismal, as discussed *supra* in sec. IV.C.3.i.a. Unit 18 spent more than 5,000 hours, over 212 days, in unforced outages during the first three quarters of 2025. *See* Ex. 4 at 6 (Powers January Declaration) (citing Ex. 14 at attachment 4-A (Saffran Q1 2025 Outage Testimony); Ex. 15 at attachment 4-A (Saffran Q2 2025 Outage Testimony); Ex. 16 at attachment 4-A, p. 2 (Saffran Q3 2025 Outage Testimony)). Unit 18's L-1 turbine blade separated from the root and fell into the condenser in February, causing an unforced outage that left the unit offline until late June. *See* Ex. 15 at attachment 4-A, p. 2 (Saffran Q2 2025 Outage Testimony). In early July, the unit experienced another outage when one of the L-0 blades on the governor end fell off one third of the way down from the tip. Ex. 16 at attachment 4-A (Saffran Q3 2025 Outage Testimony). The same November 20, 2025 filing from a NIPSCO official reports "significant damage to the

upper portion of the condenser tubes on the governor end." *Id.* Unit 18 is quite literally falling apart, and treating the unit as a critical energy asset needed to maintain reliability is facially absurd. Unit 17, while perhaps a bit less dramatically enfeebled, is also falling apart. Unit 17 spent 1,118 hours in unforced outages in 2025. *See* Ex. 4 at 6 (Powers January Declaration) (citing Ex. 14 at attachment 4-A (Saffran Q1 2025 Outage Testimony); Ex. 15 at attachment 4-A (Saffran Q2 2025 Outage Testimony); Ex. 16 at attachment 4-A, p. 2 (Saffran Q3 2025 Outage Testimony)). On September 6, the unit experienced a 201 hour unforced outage to "replace bad tubes and repair previously installed dutchmen." Ex. 16 at attachment 4-A, p. 2 (Saffran Q3 2025 Outage Testimony). In addition to the 1,044 hours cited in the Powers January Declaration, Unit 17 went on forced outage for 74 hours on November 9 due to a water level alarm. Ex. 174 at 7 (Saffran Q4 2025 Outage Testimony).

In 2026, neither unit has been able to run for any extended period of time. Unit 18 continued to be out of service on forced outage for all of 2026 thus far, and Unit 17 has been on a planned outage since late February. Ex. 194 (IURC 2026 Summer Reliability Forum (May 19, 2026); Ex. 195 at 12 (NIPSCO Summer 2026 Reliability Presentation). Both units are expected to be operational by the end of the third quarter of 2026—which is beyond the time period covered by the Orders. *Id.* As NIPSCO's president explained late last year before the Indiana Commission:

> "Unit 18 is in a forced outage; that one will take more time and effort to ultimately get it to where it needs to be, and at some point, if we do get a 202(c) [order], and it continues, we'll likely have to do some work on [Unit] 17 as well. . . . We've taken some steps to be prepared—long lead time equipment, in particular, that ultimately would have to be ordered for us to come in. Frankly, that unit needs to be rebuilt. . . . We're taking some steps to be able to do that, but it will take time; it can take six months or longer for us to ultimately be able to get that unit back to where it would need to be to operate for an extended period of time. It's just the reality of that unit being close to retirement. We're not completely unprepared, but it will take time to get that long lead time items in to be able to make the repairs necessary."

Ex. 53 (IURC 2025 Winter Reliability Forum (December 2, 2025), video recording available at https://www.youtube.com/watch?v=bCzALF4V45M, excerpt beginning at 51:35 timestamp). VP Bryan McCaul explained that, in anticipation of a 202(c) order from the Department, NIPSCO has "had a lot of negotiations with the [original equipment manufacturer], and trying to pull in future possible deliveries on those [replacement turbine] blades, and also looking at the [high pressure and intermediate pressure] turbines. . . . There's a lot of contract stuff happening trying

to make sure we are positioned to not have what was originally an 18 month lead time on those blades, maybe be more like March or May." *Id.* at 58:44. At a minimum, the Orders are inconsistent with the long-term and orderly planning processes that utilities undertake to shore up reliable operations; at worst, they set MISO up to rely on generators that will fail unexpectedly.

Culley 2 is likewise an unreliable and creaky generator. As discussed *supra* in sec. IV.C.3.ii.a, Culley 2 had an EFOR in 2024 of 32.4%; it also had a net capacity factor of 31.8%. Ex. 22 at 24 (CenterPoint 2024 Performance Report); Ex. 4 at 8 (Powers January Declaration). Like the Schahfer units, the Culley EFOR rates are substantially worse than the national average for coal-fired units of 12 percent. Ex. 4 at 8 (Powers January Declaration); *see also* Ex. 40 at 59 (NERC 2024 Reliability Report). Culley 2 has been experiencing boiler tube leaks that have been causing outages and forcing the unit offline. Ex. 22 at 24 (CenterPoint 2024 Performance Report). And the maintenance issues are likely to get worse, not better. CenterPoint Indiana has anticipated the retirement of Culley 2 and therefore not invested in major maintenance needed to keep the plant operating smoothly, as CenterPoint Indiana's vice president of power operations relayed to the Indiana Commission. "In 2025, the plant will be years past due for a turbine and generator overhaul and will require major boiler work and other capital investments to maintain safe and reliable operation." Ex. 23 at 6 (Wayne Games 2021 Testimony). CenterPoint Indiana reported that its "Culley 2 maintenance expenditure declined about 20% from 2022 to 2023 in [FERC Uniform System of A]ccount[s] 512 (Maintenance of Boiler Plant)." Ex. 4 at 9 (Powers January Declaration) (citing Ex. 152 at PDF pp. 8, 20 (CenterPoint Rate Case Discovery Responses)). "Increased maintenance spending is necessary to minimize the effect of equipment degradation with age and changing operating regimes. Plants such as F.B. Culley that have likely underspent on capital investment and O&M are at greater risk of future forced outages." Ex. 4 at 9 (Powers January Decl.). These entirely foreseeable maintenance issues hampered Culley's operation during the period of the December Culley Order. In fact, CenterPoint Indiana confirmed that during the first 48 days of the December Culley Order, the plant experienced maintenance issues that prevented regular operation of the plant nearly 90% of the time. Ex. 169 at 2 (CenterPoint Letter to USDOE) (describing operational issues during 43 of the first 48 days). It is unlikely that the plant can stay online and operational to address the purported emergency identified by the June Culley Order.

The Orders fail to come to grips with the dangers to grid reliability that they create. Unreliable coal plants like Culley 2 and Schahfer are particularly likely to cause grid disturbances.

> "Cold snaps, heat waves, and storms have all exposed coal's fragility during grid stress events. Reliability is not just about being dispatchable, it's about delivering performance under stress. Coal plants struggle to do that consistently. For coal plants to truly meet the constant demands of data centers, they would need to run at high capacity factors and avoid major outages, all of which fly in the face of current performance trends. If a large coal plant trips offline while supporting a cluster of data centers, the sudden loss of supply could lead to cascading failures across the grid. This is because generation must equal load at all times, datacenter or no datacenter. As a result, relying on coal plants to support these high-density digital loads doesn't enhance reliability, it endangers it. And it's not a matter of *if* the coal plant will fail, but *when*."

Ex. 118 at PDF pp. 2–3 (RMI Analysis of Coal Plants' Threats to Reliability).

The Department avers that it is concerned with reliability, *see* Ex. 1 at 4 (December Schahfer Order); Ex. 2 at 5 (December Culley Order); Ex. 158 at 8–9 (March Schahfer Order); Ex. 159 at 8–9 (March Culley Order); Ex. 191 at 9 (June Schahfer Order); Ex. 192 at 8 (June Culley Order), yet puts forward no analysis to address the likelihood that its Orders might actually create the (otherwise unproven) problem they are supposedly trying to address. The Department mandates generation from old plants which, in anticipation of their retirements, deferred significant maintenance needs, while stylizing the generators as needed for reliability, risking sudden break-downs and grid stability concerns. This ostrich-like approach to record evidence and public information is not reasoned decision-making. *Butte Cnty.*, 613 F.3d at 194; *cf. Ky. Mun. Energy Agency v. FERC*, 45 F.4th 162, 177 (D.C. Cir. 2022) (rejecting "ostrich-like approach" to agency decision-making).

3. The Orders Do Not Address the Plants' Continued Demonstration of Their Technical Inability to Meet the Claimed Emergency.

Separately, the Orders provide no reasoned basis to conclude that Schahfer and Culley 2, even if fully maintained and operational, could meet the claimed emergency, let alone that these Plants are the best way to do so, given the technical specifications and operational limits of the Plants.

Schahfer and Culley 2 are not designed to turn on quickly in response to extreme demand, nor are they capable of ramping their output up and down quickly. The Orders point to projections of demand growth, including from "data centers driving artificial intelligence (AI) innovation." Ex. 1 at 4 (December Schahfer Order) (internal quotation marks omitted); Ex. 2 at 4 (December Culley Order) (same); Ex.

158 at 7 (March Schahfer Order); Ex. 159 at 7 (March Culley Order); Ex. 191 at 8 (June Schahfer Order); Ex. 192 at 7 (June Culley Order) (all quoting Ex. 96 at 1 (July 2025 Resource Adequacy Report)). Even assuming *arguendo* the Department has authority under Section 202(c) to address that claimed circumstance (it does not), coal plants' "always-on nature" and "rigidity" are "a poor match for the dynamic and often unpredictable nature of data center demand." Ex. 118 at PDF p. 3 (RMI Analysis of Coal Plants' Threats to Reliability); *see also* Ex. 129 at 3 (Energy Innovation Report) (explaining that data center loads "are not 24/7 blocks. Instead, they are choppy, with swings of hundreds of megawatts over short intervals, undermining assumptions of steady baseload behavior and potentially affecting the stability of the grid if safeguards are not put in place."). "[L]arge, voltage-sensitive loads like data centers require flexible, responsive grid solutions, not slow-ramping generators that can take 12 or more hours to come online." Ex. 118 at PDF p. 3 (RMI Analysis of Coal Plants' Threats to Reliability) (relying on NERC). Fast-ramping generators are also needed to respond to extreme emergency demand increases in cases when an emergency is declared only a few hours before the demand must be met. Ex. 4 at 10 (Powers January Declaration).

Schahfer has slow ramp and startup times, as noted above in section IV.C.3.i.b. The two coal generating units have start-up targets of 22 hours after a 1-hour notice and ramp rates of 3 MWs per minute. Ex. 19 at 6 (NIPSCO CPCN Discovery Responses). NIPSCO has recognized that its coal units at Schahfer are ill suited to meet its customers' needs because of their slow ramp and start times. NIPSCO sought and received permission to decommission and reuse the interconnection rights associated with Units 17 and 18 for new gas-fired generators at the same site that would not face these problems. *See* Ex. 20 at 18 (IURC Schahfer Gas Plant Order) (describing NIPSCO's finding that it needed generation with faster ramp rates and start up times); *id.* at 14, 17 (discussing how the proposed CTs would use the interconnection rights associated with retiring units 17 and 18); *id.* at 42 (the Indiana Commission approving NIPSCO's plan to build the CTs in question). The new CT units, in contrast to Units 17 and 18, can start up in as few as 11 minutes and have a ramp rate of 140 MWs per minute, making them significantly more responsive than Units 17 and 18 to swinging demand. Ex. 19 at 6 (NIPSCO CPCN Discovery Responses). The Department's order forcing Schahfer to stay online risks delaying the in-service date for these new responsive units, because the new CT units were designed to come online using the interconnection rights of the retiring units 17 and 18. Considering how the new CT units may now have delayed in-service dates, the December, March, and June Schahfer Orders risk degraded reliability for NIPSCO and MISO customers.

CenterPoint Indiana has reached similar conclusions with regard to Culley 2. CenterPoint Indiana created two proposed generation portfolios for its 2025

integrated resource plan: a "preferred portfolio" which offered among the lowest cost and most flexible operating futures for CenterPoint Indiana in a range of possible future scenarios, and an "alternate preferred portfolio," which offers lowest cost generation solutions assuming significant large load growth. Ex. 21 at 10–11, 165–68, 185–86 (CenterPoint Indiana 2025 IRP). CenterPoint Indiana's analysis found that in the high data center load growth scenario, Culley 2 should be retired and have its interconnection rights used for a battery storage installation at the site to support system capacity and provide additional ramping capability. *See id.* at 10, 185–186; *see also* Ex. 192 at 4, 6–8 (June Culley Order) (asserting emergency conditions because of data center demand). Even without the large load assumption, use of the Culley 2 interconnection for a battery storage installation is in the preferred portfolio. Ex. 71 at 139, 165–166 (CenterPoint Indiana 2025 IRP).

The Plants are ill-suited to meet the highly variable and rapidly changing load of data centers, even compared to other coal units. The average coal plant takes 12 hours to reach maximum capacity from a cold start. Ex. 55 at 26 (IEA Flexibility Report); Ex. 118 at PDF p. 3 (RMI Analysis of Coal Plants' Threats to Reliability). By comparison, utility-scale battery storage can dispatch from a cold start to full power in a matter of seconds. Ex. 4 at 10 (Powers January Decl.). Schahfer and Culley 2, with their long startup times, are ill-suited to serve as peaking plants that respond to extreme peak demand on short notice. Ex. 4 at 10–12 (Powers January Decl.).

In short, the Orders fail to examine the inherent mismatch between the problem they diagnose and the mandates they impose. Schahfer and Culley 2 are both falling apart, and unsuited to meet the rapid ramping needs associated with the data center load growth the Orders identify as driving the purported emergency.

4. The Orders Do Not Address or Reflect Consideration of Alternatives.

Other alternatives are available to the Department that better meet the claimed emergency and serve the public interest. MISO has access to robust transmission connectivity between itself and neighboring regions to support the stability of its grid. *See, e.g.*, Ex. 35 at 2 (Patton MISO Comments) ("[I]t is important to recognize that, unlike some other RTOs, MISO has tremendous import capability that is routinely utilized during tight conditions to supplement its internal resources."). During most of the period of the Orders, MISO Zone 6 can import more than 7.5 GW. Ex. 3 at 8 (EFG Report); Ex. 37 at 12 (MISO 2025–2026 CIL/CEL Final Results); *see generally* Ex. 65 at 52–53 (DOE Transmission Planning Study) (documenting interregional variability in electricity demand); Ex. 66 at 22–35 (NERC 2024 Interregional Transfer Capability Study, Part 1) (describing transfer capabilities between MISO and other regions). For the portion of the Orders' period falling in Summer 2026, MISO Zone 6 can import 6,440 MW. Ex. 176 at 4 (MISO

2026–2027 CIL/CEL Results). The Department has long recognized that power pools and utility coordination "are a basic element in resolving electric energy shortages." *Emergency Interconnection of Elec. Facilities and the Transfer of Elec. to Alleviate an Emergency Shortage of Elec. Power*, 46 Fed. Reg. 39,984, 39,985–86 (Aug. 6, 1981). And recent history bears out the important role of transmission connectivity along with imports and exports. *See, e.g.*, Ex. 43 at 64 (Winter Storm Elliott System Operations Inquiry) ("Despite tightening conditions on the MISO system as the morning progressed, MISO maintained steadily increasing exports to TVA throughout the day."); Ex. 44 at 43, 83–84 (PJM Elliott Report) (describing PJM exports of between 8 and 11 GW to TVA, and exports to MISO and other regions); Ex. 36 at 6 (MISO Elliott Max. Gen. Event Overview) ("MISO consistently exported power to southern neighbors with a maximum value of nearly 5 GW[.]"); *see also* Ex. 7 at 1 (DOE Order No. 202-02-1) (providing for usage of interregional transmission).

The Orders fail to consider the alternative of imports and transmission connectivity to meet the claimed emergency. The Orders include no reasonable basis to question the availability of resources from neighboring regions, nor why the Orders provide a better means of ensuring resource sufficiency than addressing those barriers directly through its power to require "interchange" and "transmission" of electric energy from those neighboring regions. 16 U.S.C. § 824a(c)(1); *see* 10 C.F.R. §§ 205.373(f) & 205.375 (providing for consideration of available resources, including power transfers). The Orders' failure to consider imports and interregional transmission connectivity is unreasoned, and the Orders are not based on substantial evidence.[18]

The Orders also fail to consider limiting exports to Canada from MISO as another alternative to meet the claimed emergency. The Department has authorized many entities to export energy from MISO, including new authorizations in the last year. *See* Department Export Authorizations Library, https://www.energy.gov/oe/export-authorization-library (last visited Apr. 19, 2026); Ex. 2-52 at 11 (Department Export Authorization EA-365-C (Oct. 21, 2025)). In

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[18] The Department must also incorporate demand response and other alternatives in determining whether an emergency exists, and as a condition precedent to calling for generation by a polluting resource like Schahfer or Culley 2, a requirement consistent with Departmental practice. See 16 U.S.C. §§ 824a(c)(1)–(2); 10 C.F.R. § 205.375; e.g., Ex. 39 at 4–5 (DOE Order No. 202-22-2); Ex. 45 at 2–3 (DOE Order No. 202-21-1); Ex. 17 at 3 (DOE Order No. 202-20-2). MISO has access to demand response and authority over generator outages. See Ex. 70 at ¶¶ 20–23 (Konidena September Decl.)

addition to the Department's Section 202(c) authority, Section 202(e) of the Federal Power Act authorizes the Department to supplement or modify its export orders if necessary or appropriate. 16 U.S.C. § 824a(e). The Department could modify its export authorization to halt or limit exports from MISO if the power is needed to avert a true emergency. However, nothing in the Orders points to this as a considered alternative.

C. The Orders Exceed Other Limits on the Department's Authority.

1. The Department Lacks Jurisdiction to Impose the Availability Requirements.

In directing MISO, NIPSCO, and CenterPoint Indiana to take "all measures" to ensure that Schahfer and Culley 2 are "available to operate," Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order), the Department exceeds its authority under Section 202(c) of the Federal Power Act and impermissibly intrudes on the authority over generating facilities that Section 201(b) of the statute reserves to the states, 16 U.S.C. §§ 824(b)(1), 824a(c)(1). The sweeping language in the Department's Orders would encompass physical and all other changes necessary to revive a decrepit generating plant undergoing closure pursuant to a state-approved retirement process. The Federal Power Act's language, structure, legislative history, and interpretation by the courts all confirm that the Department's Orders are unlawful.

The structure and language of the Federal Power Act reflect Congress's deliberate choices to preserve the states' traditional authority over generating facilities and to circumscribe the Department's emergency authority in light of the states' role. The first sentence of the Federal Power Act declares that federal regulation extends "only to those matters which are not subject to regulation by the States." *Id.* § 824(a). Section 201(b)(1) states that, except as otherwise "specifically" provided, federal jurisdiction does not attach to "facilities used for the generation of electric energy." *Id.* § 824(b)(1). The courts have held that Section 201(b)(1) reserves to the states authority over electric generating facilities, *see, e.g., Hughes v. Talen Energy Mktg., LLC*, 578 U.S. 150, 155 (2016), including the authority to order their closure, *Conn. Dep't of Pub. Util. Control v. FERC*, 569 F.3d 477, 481 (D.C. Cir. 2009) (explaining that under Section 201(b), states retain the right "to require the retirement of existing generators" or to take any other action in their "role as regulators of generation facilities"). Congress also recognized the states' exclusive authority over generating facilities in Section 202(b), which provides that FERC's interconnection authority does not include the power to "compel the enlargement of generating facilities for such purposes." 16 U.S.C. § 824a(b).

There is a clear distinction between authority to regulate generation facilities and the Department's authority under Section 202(c) to require generation of electric energy. Electric energy is an electromagnetic wave, and its "generation, delivery, interchange, and transmission" is the creation and propagation of that wave. *See* Brief *Amicus Curiae* of Electrical Engineers, Energy Economists and Physicists in Support of Respondents at 2, *New York v. FERC*, 535 U.S. 1 (2002); *see also* Edison Electric Institute Glossary of Electric Utility Terms (1991 ed.) (defining electric generation as "the act or process of transforming other forms of energy into electric energy"). Section 202(c)(1), like the rest of the Federal Power Act, is written "in the technical language of the electric art" and federal jurisdiction generally "follow[s] the flow of electric energy, an engineering and scientific, rather than a legalistic or governmental test." *Conn. Light & Power v. Fed. Power Comm'n*, 324 U.S. 515, 529 (1945); *see also Fed. Power Comm'n v. Fla. Power & Light Co.*, 404 U.S. 453, 454, 467 (1972).

The scope of the Department's emergency power under Section 202(c) is bounded both by the provision's specific language and Congress's clear intention and repeated direction in the Federal Power Act to respect the states' authority over generating facilities. When an actual emergency exists, Section 202(c)(1) authorizes the Department to order only two specific things: (1) "temporary connections of facilities" and (2) "generation, delivery, interchange, or transmission of electric energy." *Id.* § 824a(c)(1). The only reference to "facilities" in the authorizing provision of Section 202(c)(1) appears in the clause relating to temporary connections, not in the clause pertaining to "generation" of electric energy. And that clause only authorizes connections "of" facilities; it does not provide authority to regulate the facilities. The differences in Congress's word choice in these clauses—referencing "facilities" in one authorizing provision but not the other—must be given effect. *See, e.g.*, *Gallardo v. Marstiller*, 596 U.S. 420, 430 (2022); *Gomez-Perez v. Potter*, 553 U.S. 474, 486 (2008).

Given Congress's use of the term "generating facilities" elsewhere in the statute, if it had intended to give the Department authority over generating facilities in Section 202(c)(1), it would have done so explicitly. Instead, the provision conspicuously excludes authority to manage the physical characteristics of power plants. Congress purposely limited and particularized the Department's emergency powers, carefully avoiding intrusion on the states' authority over generating facilities recognized in Section 201(b)(1). *See* S. Rep. No. 74-621, at 19 (explaining that the emergency powers in Section 202(c)(1) "which were indefinite in the original bill have been spelled out with particularity"); *compare* S. 1725, Cong. Tit. II § 203(a) (providing in original, unenacted bill that control of the production and transmission of electric energy "except in time of war or other emergency declared to exist by proclamation of the President, shall, as far as practicable, be by

voluntary coordination"), *with* 16 U.S.C. § 824a(c)(1) (providing particularized, specific authorities and circumstances in which the authorities may be exercised).

In certain circumstances, the Department may require generation of electric power, and a utility may properly take steps at the facility to produce the power. It is commonplace in the electric sector for the federal regulator properly acting within its authority to cause effects in a state regulator's jurisdictional sphere, and vice versa. *See Elec. Power Supply Ass'n*, 577 U.S. at 281. But the federal regulator may neither directly regulate generation facilities nor impose requirements aimed at the facilities, even if nominally regulating within its sphere. *See id.* at 281–82; see also *Hughes*, 578 U.S. at 164–65. Such encroachment is impermissible, be it in a real emergency or in a wrongly claimed one. *See Conn. Light & Power*, 324 U.S. at 530 ("Congress is acutely aware of the existence and vitality of these state governments. It sometimes is moved to respect state rights and local institutions even when some degree of efficiency of a federal plan is thereby sacrificed."). Thus, the Department may not require generation that necessitates the utility taking steps under state authority, such as building a new generating unit or refurbishing a broken one.

The Federal Power Act does not give the Department sweeping authority to order "all measures" needed to make a generation facility "available to operate." Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order); *see* 16 U.S.C. § 824a(c). Nowhere does the statute empower the Department to order "all" steps that may be needed to ensure the availability of Culley 2 and Schahfer, which could include repairs or modifications to physical facilities and other measures going far beyond electric power generation. Because generating units at both Plants are at the end of their useful lives, with years of forgone maintenance and capital expenditures, rendering the units capable of meeting a short-term supply shortfall could essentially require rebuilding significant parts of the Plants. On their face, the Department's Orders are *ultra vires*. The Orders also contravene the Federal Power Act's repeated direction to respect the states' authority over generating facilities, which includes the authority reserved to Indiana to ensure responsible closures of both generators. The Orders therefore are unlawful and should be withdrawn.[19]

[19] A utility that takes steps subject to state authority cannot point to a Section 202(c) order as the basis for a right to recover associated costs. *See* 16 U.S.C. § 824a(c)(1) (providing for compensation or reimbursement to be paid based on just and reasonable terms for carrying out an authorized order).

2. The Department Lacks Jurisdiction to Disallow Treatment of Schahfer or Culley 2 as a Capacity Resource.

The Orders state that "[b]ecause this order is predicated on the shortage of facilities for generation of electric energy and other causes," Schahfer and Culley shall not be considered capacity resources. Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order). This provision serves only to increase costs to customers, who will be required to procure duplicative capacity as a result. It is also illegal. Section 202(c) authorizes the Commission to "require by order . . . temporary connections of facilities and . . . generation, delivery, interchange, or transmission of electric energy." 16 U.S.C. §§ 824a(c)(1). Nowhere does the Federal Power Act suggest that the Department may predetermine or override FERC's determination of whether just and reasonable wholesale rates require an operating resource to be considered a capacity resource. Indeed, the very nature of 202(c) orders, which are limited to emergencies, suggests that capacity resource treatment is well outside the Department's 202(c) authority.

In addition, the Orders fail to tie this direction to the purported emergency underlying the Orders. The Orders also fail to articulate any rational connection between this direction and the Department's limited authority to "order such temporary connections of facilities and such generation, delivery, interchange, or transmission of electric energy as in its judgment will best meet the emergency and serve the public interest." 16 U.S.C. § 824a(c)(1).

The explanation the Orders offer for overriding FERC authority, essentially that Schahfer and Culley 2 cannot be capacity resources because the orders do not deem them capacity resources, is clearly circular. The true reasoning behind this provision remains unclear—but the provision's clear effect is to prevent MISO from considering the continued existence of Schahfer or Culley 2 as it works to ensure resource adequacy across its footprint. MISO's tariff defines a "capacity resource" as any of several types of resources "that are available to meet demand," and its definition of "Planning Resource" makes clear that generators like Schahfer and Culley 2 must be a Capacity Resource in order to satisfy a region's Reserve Margin Requirement. MISO Tariff Sec. 1.C, 1.P (Definitions). The Tariff also establishes clear procedures for calculating capacity contribution from all resources. *Id*. at Sec. 69A.4–69A.4.5; Schedule 53, Seasonal Accredited Capacity Calculation; Schedule 53A, Extended Seasonal Accredited Capacity Calculation. Thus, the Orders' elimination of capacity treatment for Schahfer and Culley 2 prevents MISO from following its own tariff in the wake of Schahfer and Culley's 2 continued operation and what will presumably be indefinitely renewed 202(c) orders to force Schahfer

and Culley [20] to remain operational. *See* Exhibit 124, U.S. Department of Energy's November 18, 2025 Emergency Order No. 202-25-9 (issuing a third 90-day 202(c) order forcing the J.H. Campbell Power Plant to remain online); Exhibit 131, U.S. Department of Energy's November 25, 2025 Emergency Order No. 202-25-10 (issuing a third 90-day 202(c) order forcing the Eddystone Generating Station to remain online).

The Department does not have authority under Section 202(c) to govern ratemaking matters. Under Section 202(c), "the Commission may prescribe by supplemental order such terms as it finds to be just and reasonable." *Id.* The Department of Energy Organization Act transferred authorities of the Federal Power Commission to the Department, except as provided in 42 U.S.C. chapter 84, subchapter IV. 42 U.S.C. § 7151(b). And that subchapter transfers to and vests in the Federal Energy Regulatory Commission "the establishment, review, and enforcement of rates and charges for the transmission or sale of electric energy." 42 U.S.C. § 7172(a). The capacity treatment of Culley 2 and Schahfer are one such rate matter left exclusively to FERC.

The Orders thus represent a significant and improper intrusion into FERC's authority to ensure that RTOs like MISO justly and reasonably ensure resource adequacy in their footprint. In particular, the Orders undermine years of FERC's regulatory oversight of MISO's resource adequacy construct, as codified in MISO's FERC-approved tariff. It is within FERC's purview under Section 205 of the Federal Power Act to provide that oversight, 16 U.S.C. § 824d; and it is within MISO's purview to apply its own tariff in the first instance and decide whether generators, including Schahfer and Culley 2, should qualify as a "Capacity Resource" within MISO's FERC-approved resource adequacy construct. 18 C.F.R. § 35.1(e) ("No public utility shall . . . impose any classification, practice, rule, [or] regulation . . . which is different from that provided in a rate schedule required to be on file with this Commission unless

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[20] PIOs recognize that the MISO tariff would likely allow Schahfer Units 17 and 18 to not be considered a capacity resource given the extensive repairs needed to return the unit to operation. *See supra* section V.B.2 (discussing the extensive repairs needed to return Schahfer Unit 18 to service); MISO Tariff, Module D, Sec. 64.1.1.xi (describing how units expected to be on outage for more than 31 days in a planning season can decline to participate in the Planning Auction). Regardless, however, the capacity eligibility of Schahfer and Culley 2 should be determined pursuant to the MISO tariff.

otherwise specifically provided by order of the Commission for *good cause shown*." (emphasis added)).

The Department's intrusion into the oversight relationship between FERC and the RTOs also runs afoul of the filed rate doctrine, which holds that "no change shall be made [in] any [approved] . . . rate, charge, classification, or service, or in any rule, regulation, or contract relating thereto, except after sixty days' notice to the Commission and to the public" in another filing with FERC. 16 U.S.C. § 824d(d); *Okla. Gas & Elec. Co. v. FERC*, 11 F.4th 821, 829 (D.C. Cir. 2021). Interference in MISO's capacity accreditation procedures effectuates a *de facto* change to its tariff, without the legally required notice. And more generally, "Congress rejected a pervasive regulatory scheme for controlling the interstate distribution of power in favor of voluntary commercial relationships. . . . governed in the first instance by business judgment and not regulatory coercion." *Otter Tail Power*, 410 U.S. at 374. The Department's interference here in the core operational procedures of MISO's resource adequacy construct improperly upends that relationship.

More broadly, the result of the Orders not allowing MISO to include Schahfer or Culley 2 in its resource adequacy planning will be MISO securing resources MISO determines will adequately maintain grid security without Schahfer and Culley 2, pursuant to MISO's FERC-approved tariff. The Orders provide no evidence that MISO cannot be trusted to ensure resource adequacy, so a Department determination that MISO cannot be trusted would be arbitrary and capricious. It would also conflict with the Department's heavy reliance on MISO's statements and studies in support of its assertion that the region faces an emergency in the first place. Conversely, if the Department lacks the confidence that its own dire predictions that the system does not have enough resources will come true, then it is well short of the confidence necessary for an emergency declaration under Section 202(c).

This provision imposes completely avoidable cost increases on Indiana and MISO ratepayers. During the pendency of these (unlawful) Orders, the principal effect of this provision will be to remove Schahfer and Culley 2's ability to provide replacement capacity in the event one of the resources that cleared the auction suffers a catastrophic outage or is otherwise suspended, retired, or shut down for more than 31 days in a season. Ex. 134 at 16 (MISO Manual on Resource Adequacy); *see* Ex. 119 (MISO, ZRC Replacement Guidance). Eliminating this compensation pathway will increase the financial cost of the Orders by removing a potential income stream that might have offset Schahfer and Culley 2's extremely high operational costs, and by forcing any other MISO zone that is impacted by an unexpected plant closure to look for potentially more expensive alternatives for replacement capacity.In short, including this provision is yet another way in which

the Department has misapplied the statute: its inclusion only further ensures that Schahfer and Culley 2's principal impact will not be plugging a gap but rather sabotaging MISO's resource planning process and heightening cost burdens in a manner that does not serve the public interest.

D. The Orders Fail to Provide the Conditions Required Under Section 202(c) to Lessen Conflicts with Environmental Standards and Minimize Environmental Harm.

Where an order "may result in a conflict with a requirement of any Federal, State, or local environmental law or regulation, Section 202(c) imposes several requirements. 16 U.S.C. § 824a(c). The Department must "ensure" that the order "requires generation, delivery, interchange, or transmission of electric energy only during hours necessary to meet the emergency and serve the public interest." Id. § 824a(c)(2). The Department must also "ensure," "to the maximum extent practicable," that the order "is consistent with any applicable Federal, State or local environmental law or regulation." *Id.* Additionally, the Department must ensure that the order minimizes any adverse environmental impacts, regardless of the facility's compliance (or non-compliance) with environmental standards. *See id.* The Orders violate these statutory obligations.

1. Legal Framework: Section 202(c) Further Limits the Department's Authority and Mandates Affirmative Steps to Maximize Environmental Compliance and Minimize Environmental Harm Where the Order "May Result in a Conflict" with a Federal, State, or Local Environmental Law or Regulation.

The Federal Power Act obligates the Department to include precautions in a Section 202(c) order where the order "may result in a conflict" with environmental laws or regulations. This is a forward-looking inquiry with a low threshold.[21]

The word "may" in this context denotes a mere possibility, not a certainty. This is especially apparent when matched against the term "shall" used in Section 202(c)(2) and the other provisions added to Section 202(c) at the same time. *See* Fixing America's Surface Transportation Act of 2015, Pub. L. No. 114-94, 129 Stat. 1312 § 61002 (codified at 16 U.S.C. § 824a). Congress' use of the two disparate terms must be given effect. *See, e.g.*, *Kingdomware Techs., Inc. v. United States*, 579 U.S. 162, 172 (2016) (discussing significance of the words "may" and "shall" in the same statutory provision).

[21] If actual noncompliance with environmental laws and regulations occurs to carry out the order, the statute provides a safe harbor. 16 U.S.C. § 824a(c)(3).

Moreover, the consequences need not be "noncompliance" or "violation" of environmental law, both of which are terms Congress also used in 2015 adding other provisions to Section 202(c). A potential "conflict" suffices. *Cf. Crosby v. Nat'l Foreign Trade Council*, 530 U.S. 363, 372–73 (2000) (explaining that courts find "conflict" in the preemption context where, for instance, a law or order "stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress"). Taken together, anytime a Department order creates circumstances that might obstruct the accomplishment or execution of environmental laws or regulations, Section 202(c)(2) imposes duties on the Department to maximize compliance with the law and minimize adverse environmental effects.

Congress adopted the requirements of Section 202(c)(2) to address environmental issues arising in response to emergencies on the grid. Congress was well aware of environmental issues stemming from 202(c) orders when it imposed the requirements in Section 202(c)(2). *See, e.g.*, Rolsma, 57 Conn. L. Rev. at 807–09 (discussing prior incidents of tension between environmental requirements and responses to emergencies on the grid, and congressional hearings addressing the matter as part of the passage of Section 202(c)(2)). Congress struck a reasonable balance requiring that environmental concerns not be left by the wayside while the Department responds to actual emergencies. Rather than requiring the Department to engage in a probing review of environmental laws and permits at all levels of our federalist system before acting, Congress set a low threshold for imposition of the mandatory Section 202(c)(2) duties to minimize conflicts with environmental laws and environmental harms flowing from a Section 202(c) order.

2. The Orders May Result in a Conflict with a Federal, State, or Local Environmental Law or Regulation.

Here, the Department implicitly acknowledges the possible conflicts. The Orders are limited to a 90-day duration. Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order). That temporal limitation exists for a 202(c) order that may result in a conflict with environmental requirements. 16 U.S.C. § 824a(c)(4).

Moreover, the evidence shows that the Orders may result in conflicts with environmental requirements. The Schahfer generating plant is subject to the Best Technology Available for Minimizing Adverse Environmental Impact ("BTA") standards under the National Pollutant Discharge Elimination System ("NPDES"). Specifically, 40 C.F.R. § 125.94 requires that NIPSCO use best technology available to minimize impingement mortality associated with water cooling systems in the Schahfer units. The Units each feature a closed-cycle cooling via a single multi-cell mechanical draft cooling tower. Ex. 24 at 55 (Schahfer 2020 NPDES Permit). The Indiana Department of Environmental Management ("IDEM") approved Schahfer's cooling systems as meeting the BTA standard, but stated that: "Primary in this

entrainment BTA determination is that the facility will cease operations no later than December 31, 2022 and the permittee does have closed-cycle cooling via a single multi-cell mechanical draft cooling tower on each unit which has allowed the permittee to achieve substantial reductions in water usage." *Id.* at 55. In other words, IDEM approved Schahfer's NPDES permit on the flawed assumption that Units 17 and 18 would retire as of December 31, 2022. *Id.* at 1. The NPDES permit expired September 20, 2025. Ex. 24 at 1 (Schahfer 2020 NPDES Permit). As NIPSCO noted, in order to operate Schahfer Units 17 and 18 "for one day beyond 2025," the Schahfer NPDES permit would require NIPSCO "to install a wastewater treatment system and convert the [retired] Unit 14 and 15 bottom ash handling system" so that it could be used on Units 17 and 18. Ex. 132 at PDF p. 16 (NIPSCO Rate Case Discovery Responses).

The Order also may result in a conflict with the federal coal combustion residuals ("CCR") Rule. In 2015 and in subsequent rulemakings, the EPA promulgated rules pursuant to the Resource Conservation and Recovery Act ("RCRA") which created standards for legacy surface impoundments of CCR. EPA provided an alternative compliance mechanism that extended the deadline for owners and operators to complete closure of their unlined CCR surface impoundments larger than 40 acres until October 17, 2028 if the coal-fired boiler associated with the generator would permanently retire by that same date. 40 C.F.R. § 257.103(f)(2). In its latest compliance filings for the rule, NIPSCO explained that if it ceasesd combustion of coal at Schahfer by December 31, 2025 as expected, it would be able to close its CCR impoundment (the Waste Disposal Area) by September 17, 2028, a month ahead of EPA's deadline. Ex. 25A at 6 (Schahfer CCR Part A Demonstration Addendum, part 1). But the Department's prior orders, in conjunction with the current orders, have prevented that closure, which, given the long timeline of closing the Waste Disposal Area, would cause Schahfer to breach the deadline of current federal law.

The June Culley Order also may result in a conflict with environmental laws and regulations. Culley 2 shares pollution control equipment with Culley 3, another generating unit at Culley which is not subject to an order from the Department. Culley 3 contains a flue gas desulfurization ("FGD") system which serves both units. Ex. 26 at 7 (Culley 2025 Air Permit Modification). Culley Units 3 and 2 also share equipment critical to meeting the units' NPDES permit requirements. Ex. 56 at 14 (Bradford Coal Inventory Testimony). The result of this setup is that Culley 3 outages can force Culley 2 offline for environmental compliance reasons. Culley 3 saw sustained outages in 2025 that, due to shared pollution control systems, also forced Culley 2 offline. *See* Ex. 27 at 3 (CenterPoint Fuel Cost Order) (describing how "due to the environmental parameters associated with the Culley Unit 3 outage, Culley Unit 2's availability will be limited until Unit 3 comes back online").

As a result, even if Culley 2 is operational, any downtime needed to service Culley 3 may result in a conflict with environmental requirements.

Independently, running Culley 2 may result in clear conflict with the plant's NPDES permit. The permit mandates that "[b]eginning December 31, 2025, there shall be no discharge of bottom ash transport water from Unit 2." Ex. 28 at 6 (Culley 2024 NPDES Permit).

The Orders may result in additional conflicts with air pollution laws and regulations. For example, EPA has approved Indiana's regional haze state implementation plan revision. Ex. 57 (2026 EPA IN Haze SIP Approval). Indiana conducted its regional haze state implementation analysis under the assumption that owners of electric generating unit sources would "continue to shutdown units, convert to natural gas, and rely more on renewable energy." Ex. 69 at 2 (IN Haze SIP Responses to Public Comments); *see also* 90 Fed. Reg. 25,951 (finding Indiana's choice not to apply the four factor test to all of the state's EGUs reasonable because given "historical data showing relatively consistent or declining NO_X and SO_2 annual emissions and emission rates, as well as 2028 projections, the overall emissions are not expected to increase in the future"). The Department's Orders prevent the retirement of Schahfer and Culley 2 and affect how the Plants are dispatched. *See* Ex. 191 at 9–10 (June Schahfer Order); Ex. 192 at 8–9 (June Culley Order). As such, the Orders may result in conflicts with environmental requirements.

3. The Orders Lack the Conditions Required by Section 202(c).

i. The Orders' Terms Fail to Require Generation Only During Hours Necessary to Meet the Purported Emergency.

The Orders directly contradict the Department's obligation to ensure its orders require generation "only during hours necessary to meet the emergency." 16 U.S.C. § 824a(c)(2). The Orders instead state: "For the duration of this Order, MISO is directed to take every step to employ *economic* dispatch" of the Schahfer and Culley 2 Plants "to *minimize cost* to ratepayers." Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order) (emphasis added). The "emergency" nominally described by the Orders is the potential "loss of power to homes and businesses in the areas that may be affected by curtailments or power outages." Ex. 191 at 9 (June Schahfer Order); Ex. 192 at 8 (June Culley Order). Even if the Department had substantiated that emergency (which it has not), the Federal Power Act would allow the Department to compel generation only when needed to prevent such

involuntary curtailments or outages. 16 U.S.C. 824a(c)(2).[22] "Economic dispatch," in sharp contrast, requires "the lowest-cost resources [to] run first," in pursuit of "the lowest-cost energy available." *City of New Orleans v. FERC,* 67 F.3d 947, 948–49 (D.C. Cir. 1995)*; see also Fla. Power & Light Co. v. FERC,* 88 F.3d 1239, 1241 (D.C. Cir. 1996) (noting distinction between economic dispatch and reserve capacity rules).

By instructing MISO to employ economic dispatch, the Orders' terms permit (indeed, direct) operation of Schahfer 17, Schahfer 18, and Culley 2 even when other—albeit potentially higher cost—resources are available that would prevent any "curtailments or power outages"—that is, the claimed emergency. Ex. 191 at 9 (June Schahfer Order); Ex. 192 at 8 (June Culley Order). The Orders' further instructions—limiting dispatched units "to the times and within the parameters as determined by MISO pursuant to paragraph A," Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order)—just repeats that initial instruction to "employ economic dispatch," without any further limitation.[23]

ii. The Orders Fail to Ensure Maximum Practicable Consistency with Environmental Rules and to Minimize Adverse Environmental Impacts.

The Orders further fail to "ensure" that Schahfer and Culley 2 operate, "to the maximum extent practicable," in conformity with applicable environmental rules. 16 U.S.C. § 824(c)(2). The Orders paraphrase the statutory text—that "operation of

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[22] *See, e.g.,* Ex. 6 at 9 (DOE Order No. 202-17-4 Summary of Findings) ("authorizing operation of" units subject to emergency order "only when called upon . . . for reliability purposes," according to "dispatch methodology" approved by the Department); *see also* Ex. 160 at 7 (Department Order No. 202-26-01) (authorizing specified entities "to direct [certain] backup generation resources . . . to operate as a last resort before declaring an Energy Emergency Alert (EEA) 3 (i.e., before firm load interruption) or during an EEA 3"); Ex. 161 at 7 (Department Order No. 202-26-01A) (authorizing specified entities "to direct [certain] backup generation resources . . . to operate after ERCOT deploys all available market services, except for frequency responsive services, before declaring an Energy Emergency Alert (EEA) 3 (i.e., before firm load interruption) or during an EEA 3"); cf. Ex. 162 at 3 (Department Order No. 202-26-03) ("In the event that ISO-NE determines that generation from the Specified Resources is necessary to meet the electricity demand that ISO-NE anticipates in its service territory, I direct ISO-NE to dispatch such unit or units and to order their operation only as needed to maintain reliability.").

[23] That direction further fails to conform to the statute's command to compel only the generation that will "best meet the emergency." 16 U.S.C. § 824(c)(1).

the [affected units] must comply with applicable environmental requirements . . . to the maximum extent feasible," but fail to specify *who* bears that responsibility or *what* such operation entails. Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order). The Orders impose no further substantive conditions beyond stating that they "do[] not provide relief from any obligation to pay fees or purchase offsets or allowances for emissions[.]" *Id.* The direction to "comply . . . to the maximum extent feasible" is, as a result, wholly unenforceable; the Orders provide no basis for the Department, or anyone else, to determine whether each plant is in fact complying or who might face the consequences of any failure to do so. *See* Ex. 9 at 5–7 (DOE Order No. 202-22-4) (requiring, *inter alia,* reporting of "number and actual hours each day" of operation "in excess of permit limits or conditions," and information describing how generators complied with environmental requirements to maximum extent feasible). Consequently, the Orders do not meet the Department's statutory obligation to "*ensure*" the maximum feasible consistency with applicable environmental standards—an obligation that requires the Department to offer some discrete guidance as to the Plants' operations, rather than merely parroting the statutory text. 16 U.S.C. § 824a(c)(2) (emphasis added). In addition, the Orders fail to "minimize[] any adverse environmental impacts." 16 U.S.C. § 824a(c)(2). That mandate is textually and substantively distinct from the Department's (also unfulfilled) obligation to ensure maximum practicable compliance with environmental standards. *Id.* The Orders claim to minimize environmental impacts by "limit[ing] operation of [dispatched units] to the times and within the parameters as determined by MISO, pursuant" to the Orders' "paragraph A." Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order). But in both Orders, paragraph A contains only a command that MISO "take all measures necessary to ensure" that the Schahfer and Culley 2 Plants are "available to operate" and "employ economic dispatch . . . to minimize cost to ratepayers," and requires a directive that NIPSCO and CenterPoint Indiana comply with MISO's orders implementing the Orders' commands.[24] *Id.* An instruction minimizing ratepayer costs and demanding availability has no rational relationship to a requirement to minimize environmental impacts. The Orders contain no

[24] To the extent the Orders allow MISO to independently devise conditions limiting environmental impacts, that mere possibility, first, cannot satisfy the Department's own statutory obligation to "ensure" that its "order" minimizes environmental impacts (and limits hours to those necessary to meet the emergency, and mandates the maximum practicable compliance). 16 U.S.C. § 824a(c)(2). And even if it could, the Orders require MISO to employ "economic dispatch" and "ensure" that Schahfer and Culley are "available to operate"—directions that are flatly inconsistent with the statute's requirements to minimize the Plants' environmental impacts.

requirement similar to the requirements recommended by PIOs' expert engineer Mr. Powers: "DOE should require verification of the good working order of the Schahfer 17 and 18 air emission control systems before authorizing Schahfer 17 and 18 to operate under extreme demand conditions" or a similar recommendation for Culley 2. Ex. 4 at 19–20, 22 (Powers January Decl.).

Additionally, the Orders include no measures that would mitigate impacts when compliance with environmental standards proves impracticable—measures that have been routinely included in past orders. *See, e.g.*, Ex. 6 at 9 (DOE Order No. 202-17-4 Summary of Findings) (permitting non-compliant operation only during specified hours, and requiring exhaustion of "all reasonably and practically available resources," including demand response and identified behind-the-meter generation resources selected to minimize an increase in emissions); Ex. 9 at 7 (DOE Order No. 202-22-4) (requiring "reasonable measures to inform affected communities" of non-compliant operations). At a minimum the statute requires the Department to include sufficiently detailed reporting obligations to ascertain what impacts result from emergency operations; without such reporting, the Department has no ability to "ensure" that adverse impacts are minimized. *See, e.g.*, Ex. 110 at 5 (DOE Order No. 202-24-1) (requiring detailed data on emissions of pollutants). The Orders here instead only require "such additional information" as the Department, in the future, may (or may not) "request[] . . . from time to time." Ex. 191 at 10 (June Schahfer Order); Ex. 192 at 9 (June Culley Order); Ex. 1 at 5 (December Schahfer Order); Ex. 2 at 5 (December Culley Order). That possibility of future, unspecified inquiry cannot satisfy the statute's demand that the Department "ensure" that its Orders minimize environmental impacts. 16 U.S.C. § 824a(c)(2). As one example of mitigation measures, PIOs' expert engineer, Mr. Powers, suggested that if permit limits for PM, NO_x, or SO_2 are exceeded (as measured on the onsite monitors) during operation of Schahfer 17 and 18 or of Culley 2, the respective units should be shut down. Ex. 4 at 20, 22 (Powers January Decl.). Declining to include such a measure, particularly when there is no apparent risk of loss of power to homes and businesses in the area absent power from Schahfer and Culley 2, does not conform with the requirement of Section 202(c)(2) that the Department order generation only during hours needed to meet the claimed emergency and best serve the public interest.

iii. There is No Indication That the Department Has Conducted the Consultation Required by Section 202(c)(4)(B) or Adopted Conditions Resulting From Consultation.

Finally, there is no indication in the Orders that the Department has, as Section 202(c)(4)(B) requires, "consult[ed] with the primary Federal agency with expertise in the environmental interest protected" by the laws with which the Orders may

conflict. 16 U.S.C. § 824a(c)(4)(B). The Orders serve as a renewal or re-issuance of the Department's December and March Schahfer and Culley Orders; their claimed basis is that '[t]he emergency conditions that necessitated the issuance of [the prior order] continue." Ex. 191 at 4 (June Schahfer Order); Ex. 192 at 3 (June Culley Order). But the Department has provided no evidence of consultation with the Environmental Protection Agency (or any other agency with expertise in Schahfer and Culley 2's air and water pollution). Cf. Ex. 163 at 2 (Department Order No. 202-22-2 Amendment No. 1) (stating that "the Department consulted with EPA… and EPA did not request any additional conditions"); Ex. 167 at 2 (Department Order No. 202-22-1 Amendment No. 2) (same); Ex. 6 at 9–10 (DOE Order No. 202-17-4 Summary of Findings) (including EPA consultation in public record). Nor is there any evidence of "[t]he conditions, if any, submitted" by EPA (or any other agency) following consultation, or "an explanation of [the Department's] determination" that such conditions "would prevent the [Orders] from adequately addressing the emergency"—material that Section 202(c)(4)(B) requires the Department to make "available to the public." 16 U.S.C. § 824a(c)(4)(B); *see* Ex. 164 at 1 (Starfield Email to Hoffman) (made public by Department). If the Department has failed to consult and procure the required conditions, it has violated the statute. *Id*. If it has received and declined such conditions, but refused to disclose them or an explanation of why the Department does not believe any such conditions are necessary, that too violates the law. *Id*.

VI. REQUEST FOR STAY

PIOs further move the Department for a stay of the Orders until the conclusion of judicial review. 18 C.F.R. § 385.212.[25] The Department has the authority to issue such a stay under the Administrative Procedure Act and should do so where "justice so requires." 5 U.S.C. § 705. In deciding whether to grant a request for stay, agencies consider (1) whether the party requesting the stay will suffer irreparable injury without a stay; (2) whether issuing a stay may substantially harm other parties; and (3) whether a stay is in the public interest. *Nken v. Holder*, 556 U.S. 418, 434, 436 (2010); *Ohio v. EPA*, 603 U.S. 279, 291 (2024); *see, e.g.*, *Midcontinent Indep. Sys. Operator, Inc.,* 184 FERC ¶ 61,020, at P 41 (2023); *ISO New Eng. Inc.*, 178 FERC ¶ 61,063, at P 13 (2022), *rev'd on other grounds sub nom. In re NTE Conn., LLC*, 26 F.4th 980, 987–88 (D.C. Cir. 2022).

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[25] Pursuant to FPA Section 313(c) and Rule 713(e) of the applicable rules, the filing of a request for rehearing does not automatically stay a Department order. 16 U.S.C. § 825*l*(c); 18 C.F.R. § 385.713(e).

Injuries under this standard must be actual, certain, imminent, and beyond remediation. *Mexichem Specialty Resins, Inc. v. EPA*, 787 F.3d 544, 555 (D.C. Cir. 2015); *Wis. Gas Co. v. FERC*, 758 F.2d 669, 674 (D.C. Cir. 1985); *ANR Pipeline Co.*, 91 FERC ¶ 61,252, at 61,887 (2000); *City of Tacoma*, 89 FERC ¶ 61,273, at 61,795 (1999) (recognizing that, absent a stay, options for "meaningful judicial review would be effectively foreclosed"). Financial injury is only irreparable where no "adequate compensatory or other corrective relief will be available at a later date, in the ordinary course of litigation." *Wis. Gas Co.*, 758 F.2d at 674 (*quoting Va. Petroleum Jobbers Ass'n v. Fed. Power Comm'n*, 259 F.2d 921, 925 (D.C. Cir. 1958)); *see also In re NTE Conn., LLC*, 26 F.4th 980, 991 (D.C. Cir. 2022). Environmental injury, however, "can seldom be adequately remedied by money damages and is often permanent or at least of long duration, *i.e.*, irreparable. If such injury is sufficiently likely, therefore, the balance of harms will usually favor the issuance of an injunction to protect the environment." *Amoco Prod. Co. v. Vill. of Gambell*, 480 U.S. 531, 545 (1987).

Under those standards, a stay of the Orders is appropriate.

A. Intervenors Will Suffer Irreparable Harm Without a Stay of the Orders.

A stay is necessary to protect PIOs, their members, and the public from harm from continued coal-fired power operations caused by the Department's Orders.

As noted extensively *supra* sec. IV.C.3.i.c and ii.c, Schahfer and Culley 2 emit health- and environment-harming air pollutants like nitrogen oxides, sulfur dioxide, particulate matter, and volatile organic compounds. New and existing coal combustion residuals will continue to pollute groundwater. The health and environmental harms from this pollution flow directly from the Department's Orders and are actual, specific, and imminent, and can be deadly. They will affect the lives and well-being of PIOs and their members. The stark public health stakes of PIOs' request for stay require the Department to pause implementation of its Orders until a court reviews their validity.

Additionally, without a stay, the Orders create other injuries too. The Orders needlessly force NIPSCO and CenterPoint Indiana to continue to divert attention and investment dollars away from planned reuse of the Schahfer and Culley 2 interconnection rights for other generation projects. In doing so, the Department denies PIOs' members the benefits of Indiana's energy policies which are designed to benefit them and the public. In addition to forcing ratepayers to pay for the availability and dispatch of uneconomic, unreliable, and obsolete resources that the State, stakeholders, and owners want to close, *see supra* sec. IV.C, the Department's Orders jeopardize the diversification of generating resources the Department itself

has said increases grid reliability. Ex. 142 (Dep't of Energy, *Energy Reliability and Resilience*). There is no clear recourse to remedy those injuries either.

B. A Stay Would Not Result in Harm to Any Other Interested Parties.

No other interested parties would be harmed by a stay. The issuance of a stay would not harm end-use electricity consumers because the lack of an actual emergency means that a stay would not disrupt the provision of electricity. *See supra* secs. IV.B–.C, V.A. Furthermore, because MISO, the Indiana Commission, NIPSCO, and CenterPoint Indiana have already planned for Schahfer and Culley 2's closures and continue to plan for resource adequacy, a stay would only have the effect of relieving them of the administrative, compliance, and planning burdens imposed by the Orders. On the balancing of equities, there is therefore no meaningful countervailing harm that would follow from a stay.

C. A Stay Is in the Public Interest Given the Significant Evidence Demonstrating There is No Factual or Legal Support for These Orders, and Given the Harm they Produce to the Broader Public.

There is no public interest served by the Orders, and a stay will only benefit the public. First, the Orders exceed the Department's authority; the Orders have provided no reasonable grounds to substantiate any near-term or imminent shortfall in electricity supply that would justify Schahfer and Culley 2's continued operation. *See League of Women Voters v. Newby*, 838 F.3d 1, 12 (D.C. Cir. 2016) (noting "there is a substantial public interest 'in having governmental agencies abide by the federal laws that govern their existence and operations'") (quoting *Washington v. Reno*, 35 F.3d 1093, 1103 (6th Cir. 1994)). Second, the Orders override Indiana's exercise of its "authority to choose [its] preferred mix of energy generation resources." *Citizens Action*, 125 F.4th at 239. By doing so, the Orders unlawfully intrude into states' reserved authority over in-state "facilities used for the generation of electric energy." 16 U.S.C. § 824(b)(1); *see Pac. Gas & Elec.*, 461 U. S. at 205 ("Need for new power facilities, their economic feasibility, and rates and services, are areas that have been characteristically governed by the States."); *see also Hughes*, 578 U.S. at 154 (cleaned up) ("Under the [Federal Power Act], FERC has exclusive authority to regulate the sale of electric energy at wholesale in interstate commerce. . . . But the law places beyond FERC's power, and leaves to the States alone, the regulation of any other sale—most notably, any retail sale—of electricity."). And third, a stay would protect the broader public—beyond PIOs and their members—from the onerous costs, and dangerous pollution, produced by unnecessary operation of the Schahfer and Culley 2 Plants.

VII. Conclusion

For the reasons set forth above, the undersigned Public Interest Organizations respectfully request that the Department grant intervention with respect to each Order; grant rehearing and rescind the Orders (and any renewals of the Orders); and stay the Orders.

Filed on July 13, 2026.

Submitted by:

[*Continued to next page for signatures*.]

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Attachment: Index of Exhibits

Index of Exhibits

No.	Exhibit Name	Document Name	URL
1	December Schahfer Order	U.S. Department of Energy's December 23, 2025 Emergency Order No. 202-25-12	https://www.energy.gov/documents/order-number-202-25-12-schahfer
2	December Culley Order	U.S. Department of Energy's December 23, 2025 Emergency Order No. 202-25-13	https://www.energy.gov/documents/order-number-202-25-13-culley
3	EFG Report	Carlos Peña and Anna Sommer of Energy Futures Group, Reliability and Capacity Assessment of F.B. Culley 2 and R.M. Schahfer 17 and 18, January 21, 2026	
4	Powers January Declaration	Schahfer 17 & 18 and Culley 2 Declaration of Bill Powers, P.E., January 21, 2026	
5	Synapse Report	Report of Lucy Metz and Devi Glick of Synapse Energy Economics on cost of continued operation of Culley Unit 2 and Schahfer Units 17–18 under Federal Power Act orders, January 21, 2026	
6	DOE Order No. 202-17-4 Summary of Findings	Summary of Findings DOE Order No. 202-17-4 (Sep. 14, 2017)	https://www.energy.gov/sites/default/files/2017/09/f36/Order%20202-17-4%20Summary%20of%20Findings.pdf

No.	Exhibit Name	Document Name	URL
7	DOE Order No. 202-02-1	DOE, Order No. 202-02-1 (Aug. 16, 2002)	https://www.energy.gov/sites/default/files/202%28c%29%20order%20202-02-1%20August%2016%2C%202002%20-%20CSC.pdf
8	Cooke Email to Alle-Murphy	Email from Lot Cooke, DOE to Linda Alle-Murphy Re: Rehearing procedures for DOE Order No. 202-05-3	https://www.energy.gov/oe/articles/question-and-answer-procedural-questions-application-rehearing-order-no-202-05-02?nrg_redirect=397676
9	DOE Order No. 202-22-4	DOE, Order No. 202-22-4 (Dec. 24, 2022)	https://www.energy.gov/sites/default/files/2022-12/PJM%20202%28c%29%20Order.pdf
10	Grid Strategies June Report	Michael Goggin, *A Review of DOE's 202(c) Order for the Campbell Coal Plant* (June 18, 2025)	
11	NIPSCO 2025 Planning Reserve Margin Report	NIPSCO 2025 Annual Report in Compliance With Ind. Code § 8-1-8.5-13	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/1a22a22e-cc26-f011-8c4e-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=46233_NIPSCO_Submission%20of%20Redacted%20Report_05012025.pdf
12	CenterPoint 2025 Planning Reserve Margin Report	CenterPoint Energy Indiana South 2025 HEA 1520 Report Pursuant to I.C. § 8-1-8.5-13 (May 23, 2025)	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/e865df14-0c38-f011-8c4e-001dd80846ac/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=46236_CEIS_Notice%20of%20Submission%20of%20HEA%201520%20Report_052325.pdf
13	NIPSCO Performance Metric Collaborative Update	Northern Indiana Public Service Company LLC's Annual Performance Metric Collaborative Update, IURC Cause No. 44688, July 1, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/9847a67d-a756-f011-877b-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=44688_NIPSCO_Compliance%20Filing%20-%20PMC%20Update_07012025.pdf

No.	Exhibit Name	Document Name	URL
14	Saffran Q1 2025 Outage Testimony	Direct Testimony of David Saffran on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 147, May 23, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/0f58f29b-f637-f011-8c4e-001dd80846ac/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC147_NIPSCO_Petitioners%20Exhibit%204%20(Saffran)_05232025.pdf
15	Saffran Q2 2025 Outage Testimony	Direct Testimony of David Saffran on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 148, Aug. 18, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/635d1149-747c-f011-b4cc-001dd80846ac/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC148_NIPSCO_Petitioners%20Exhibit%204%20(Saffran)_08182025.pdf
16	Saffran Q3 2025 Outage Testimony	Direct Testimony of David Saffran on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 149, Nov. 20, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/e268e77b-52c6-f011-bbd3-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC149_NIPSCO_Petitioners%20Exhibit%204%20(Saffran)_11202025.pdf
17	DOE Order No. 202-20-2	Department of Energy Order No. 202-20-2 (Sept. 6. 2020)	https://www.energy.gov/oe/articles/federal-power-act-section-202c-caiso-september-2020?nrg_redirect=454296
18	Wagner November Testimony	Direct Testimony of John A. Wagner on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 149, Nov. 20, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/08174aa0-52c6-f011-bbd3-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC149_NIPSCO_Petitioners%20Exhibit%203%20(Wagner)_11202025.pdf
19	NIPSCO CPCN Discovery Responses	IURC Cause No. 45947, NIPSCO-CAC Joint Exhibit 6 (NIPSCO's Public Responses to CAC Data Requests), July 11, 2024	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/98b5e199-824b-ef11-a316-001dd8073c71/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45947%20NIPSCO.CAC%20Joint%20Exhibit%20No.%206.pdf

No.	Exhibit Name	Document Name	URL
20	IURC Schahfer Gas Plant Order	Indiana Utility Regulatory Commission Order in Cause No. 45947 dated October 16, 2024	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/8d902453-cd8b-ef11-ac21-001dd80bd98a/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_45947_101624.pdf
21	CenterPoint Indiana 2025 IRP	CenterPoint Energy Indiana South 2025 Integrated Resource Plan	https://www.in.gov/iurc/files/CEIS_2025_IRP_Volume_1_of_2.pdf
22	CenterPoint 2024 Performance Report	CenterPoint Energy Indiana South 2024 Electric Performance Report	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/ec855054-7c53-f011-877a-001dd80846ac/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45564_CEI%20South_Electric%20Performance%20Report_062725.pdf
23	Wayne Games 2021 Testimony	Rebuttal Testimony of Wayne D. Games To The Direct Testimony Of Intervening Parties On Need For Resources To Replace Existing Inefficient Units, Cause No. 45501 (May 24, 2021).	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/76eb9f24-6ebd-eb11-8236-001dd802dc58/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45501_CenterPoint%20Energy%20Indiana%20South_Games%20Rebuttal%20Testimony%20Petitioners%20Exhibit%20No%203-R%20(PUBLIC)_052421.pdf
24	Schahfer 2020 NPDES Permit	Indiana Dept. of Envtl. Mgmt. Approval of Schahfer Generating Station NPDES Permit Application (Sep. 24, 2020)	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83057089&dDocName=83057294&Rendition=web&allowInterrupt=1&noSaveAs=1
25A	Schahfer CCR Part A Demonstration Addendum, part 1	NIPSCO R.M. Schahfer Generating Station: Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of	https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/ccr/r.m.-schahfer/r.m.-schahfer-generating-station-groundwater-moniitoring-and-corrective-action/rm-schahfer-generating-station-wda-part-a-addendum-2-summer-2022.pdf?sfvrsn=d2e31151_3

No.	Exhibit Name	Document Name	URL
		Coal-fired Boilers by a Date Certain – Addendum 2 (August 2022), PDF pp. 1–191	
25B	Schahfer CCR Part A Demonstration Addendum, part 2	NIPSCO R.M. Schahfer Generating Station: Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-fired Boilers by a Date Certain – Addendum 2 (August 2022), PDF pp. 192-466.	(*Same as Exhibit 25A*)
25C	Schahfer CCR Part A Demonstration Addendum, part 3	NIPSCO R.M. Schahfer Generating Station: Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-fired Boilers by a Date Certain – Addendum 2 (August 2022), PDF pp. 467-691	(*Same as Exhibit 25A*)
26	Culley 2025 Air Permit Modification	Indiana Dept. of Envtl. Management, Minor Permit Modification to Part 70 Operating Permit No. T173-43264-00001 (July 7, 2025), PDF pp. 1–191	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83826642&dDocName=83830685&Rendition=web&allowInterrupt=1&noSaveAs=1
27	CenterPoint Fuel Cost Order	IURC Order, Cause No. 38708 FAC 146, April 30, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/08b0fe52-d625-f011-998a-001dd80b1717/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_38708FAC146_043025.pdf

No.	Exhibit Name	Document Name	URL
28	Culley 2024 NPDES Permit	Indiana Dept. of Envtl. Management, Modification to NPDES Permit No. IN0002259, May 3, 2024	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83630044&dDocName=83634089&Rendition=web&allowInterrupt=1&noSaveAs=1
29	Bradford 2025 CCR Testimony	Direct Testimony of F. Shane Bradford on behalf of CenterPoint Energy Indiana South, IURC Cause No. 45052 ECA 6, May 7, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/1f3f3a58-3b2c-f011-8c4e-001dd8084fd9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45052%20ECA%206_CEI%20South_Pet.%27s%20Ex.%20No.%201_Bradford%20Direct%20Testimony%20and%20Attachment_050725%20(2).pdf
30	DOE Rehearing Procedures	U.S. Dep't of Energy, DOE 202(c) Order Rehearing Procedures (last visited June 17, 2025)	https://www.energy.gov/ceser/doe-202c-order-rehearing-procedures
31	MISO 2025–26 Auction Results	MISO, Planning Resource Auction, Results for Planning Year 2025-2026 (Apr. 2025)	https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf
32	MISO Emergency Declarations	MISO, Maximum Generation Emergency Declarations through June 2024 (Aug. 30, 2024)	https://www.oasis.oati.com/woa/docs/MISO/MISOdocs/Capacity_Emergency_Historical_Information.pdf
33	MISO Market Capacity Emergency	MISO, Market Capacity Emergency, SO-P-EOP-11-002 Rev: 23 (Oct. 15, 2025)	https://cdn.misoenergy.org/SO-P-EOP-11-002%20Rev%2023%20MISO%20Market%20Capacity%20Emergency683501.pdf
34	Ramey MISO Comments	Comments of Todd Ramey on Behalf of Midcontinent ISO, Inc. (May 28, 2025), Docket No. AD24-11-000, Accession No. 20250528-4032	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250528-4032&optimized=false&sid=4f4f3475-8309-4416-8289-2aee6d84c1a8

No.	Exhibit Name	Document Name	URL
35	Patton MISO Comments	Technical Conference Comments of David B. Patton, Ph.D., MISO Independent Market Monitor (May 28, 2025), Docket No. AD25-7-000, Accession No. 20250528-4006	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250528-4006&optimized=false&sid=2c5ac909-a7f0-47eb-9bb3-c35f89976250
36	MISO Elliott Max. Gen. Event Overview	MISO, Overview of Winter Storm Elliott December 23, Maximum Generation Event (Jan. 17, 2023)	https://cdn.misoenergy.org/20230117%20RSC%20Item%2005%20Winter%20Storm%20Elliott%20Preliminary%20Report627535.pdf
37	MISO 2025–2026 CIL/CEL Final Results	MISO, 2025-2026 PY Seasonal CIL/CEL Final Results (Oct. 24, 2024)	https://cdn.misoenergy.org/20241024%20LOLEWG%20Item%2004%20PY%202025-2026%20Final%20CIL_CEL%20Results654989.pdf
38	MISO LOLE Presentation	MISO, *LOLE 101: Probabilistic Analyses*	https://cdn.misoenergy.org/LOLE%20101%20Training624875.pdf
39	DOE Order No. 202-22-2	Department of Energy Order No. 202-22-2 (Sept. 4, 2022)	https://www.energy.gov/ceser/federal-power-act-section-202c-banc-september-2022
40	NERC 2024 Reliability Report	NERC, 2024 State of Reliability (June 2024) (excerpt)	https://www.nerc.com/pa/RAPA/PA/Performance%20Analysis%20DL/NERC_SOR_2024_Technical_Assessment.pdf
41	NERC 2025 Summer Reliability Assessment	NERC, 2025 Summer Reliability Assessment (May 2025)	https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2025.pdf

No.	Exhibit Name	Document Name	URL
42A	2019–24 NERC Summer Reliability Assessments, part 1	NERC, Summer Reliability Assessments for 2019–2024 (Compiled), PDF pp. 1–89	2019 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2019.pdf 2020 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2020.pdf 2021 Reliability Assessment: https://nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC%20SRA%202021.pdf 2022 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2022.pdf 2023 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2023.pdf 2024 Reliability Assessment: https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2024.pdf
42B	2019–24 NERC Summer Reliability Assessments, part 2	NERC, Summer Reliability Assessments for 2019–2024 (Compiled), PDF pp. 90–176	(*Same as Exhibit 42A*)
42C	2019–24 NERC Summer Reliability Assessments, part 3	NERC, Summer Reliability Assessments for 2019–2024 (Compiled), PDF pp. 177–264	(*Same as Exhibit 42A*)

No.	Exhibit Name	Document Name	URL
43	Winter Storm Elliott System Operations Inquiry	FERC, NERC, and Regional Entity Staff Report, Inquiry into Bulk-Power System Operations During December 2022 Winter Storm Elliott (Oct. 2023)	https://www.ferc.gov/media/winter-storm-elliott-report-inquiry-bulk-power-system-operations-during-december-2022#
44	PJM Elliott Report	PJM, *Winter Storm Elliott: Event Analysis and Recommendation Report* (July 17, 2023)	https://www.pjm.com/-/media/DotCom/library/reports-notices/special-reports/2023/20230717-winter-storm-elliott-event-analysis-and-recommendation-report.pdf?ref=blog.gridstatus.io
45	DOE Order No. 202-21-1	Department of Energy Order No. 202-21-1 (Feb. 14, 2021)	https://www.energy.gov/oe/articles/federal-power-act-section-202c-ercot-february-2021?nrg_redirect=364318
46	FERC Energy Primer	FERC, Energy Primer: A Handbook of Energy Market Basics (Dec. 2023) (excerpt)	https://www.ferc.gov/media/energy-primer-handbook-energy-market-basics
47	[Omitted.]		
48	Utility Dive, MISO begins reviewing 6.1 GW — 70% of it gas — in fast-track interconnection study (Dec. 2, 2025)	Ethan Howland, Utility Dive, MISO begins reviewing 6.1 GW — 70% of it gas — in fast-track interconnection study (Dec. 2, 2025)	https://www.utilitydive.com/news/miso-eras-fast-track-interconnection-study-gas/806747/
49	2025 Energy Innovation Dataset	Energy Innovation, dataset for Coal Power 28 Percent More Expensive In 2024 Than In 2021 (June 5, 2025)	https://energyinnovation.org/report/coal-power-28-percent-more-expensive-in-2024-than-in-2021/

No.	Exhibit Name	Document Name	URL
50	2025 Energy Innovation Coal Cost Report	Energy Innovation, Coal Power 28 Percent More Expensive In 2024 Than In 2021 (June 5, 2025)	https://energyinnovation.org/wp-content/uploads/Coal-Cost-Update.pdf
51	2023 Energy Innovation Coal Cost Report	Energy Innovation, Coal Cost Crossover 3.0 (Jan. 2023)	https://energyinnovation.org/wp-content/uploads/Coal-Cost-Crossover-3.0-2.pdf
52	Department Export Authorization EA-365-C (Oct. 21, 2025)	Research Power Corp., Order No. EA365-C (Oct. 21, 2025)	https://www.energy.gov/sites/default/files/2025-11/EA-365-C%20Research%20Power%20Corporation%20-%20Export%20Authorization%20Order.pdf
53	IURC 2025 Winter Reliability Forum (December 2, 2025)	Excerpt in .MP4 format of video recording of IURC 2025 Winter Reliability Forum (December 2, 2025), beginning at 51:35 timestamp	https://www.youtube.com/watch?v=bCzALF4V45M
54	NARUC Coal Report	National Association of Regulatory Utility Commissioners, Recent Changes to U.S. Coal Plant Operations and Current Compensation Practices (Jan. 2020) (excerpt)	https://www.osti.gov/servlets/purl/1869928
55	IEA Flexibility Report	C. Henderson, International Energy Agency, Increasing the flexibility of coal-fired power plants (Sept. 2014) (excerpt)	https://usea.org/sites/default/files/092014_Increasing%20the%20flexibility%20of%20coal-fired%20power%20plants_ccc242.pdf
56	Bradford Coal Inventory Testimony	Direct Testimony of F. Shane Bradford on behalf of CenterPoint Energy Indiana South,	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/54dd55d5-bbc4-f011-bbd3-001dd8084346/bb9c6bba-fd52-45ad-8e64-

No.	Exhibit Name	Document Name	URL
		IURC Cause No. 38708 FAC 149, Nov. 17, 2025	a444aef13c39?file=38708FAC149_CEI%20South%20Electric_No%201%20Bradford%20Testimony%20and%20Attachments%20PUBLIC_111725.pdf
57	2026 EPA IN Haze SIP Approval	Air Plan Approval; Indiana; Regional Haze Plan for the Second Implementation Period	https://www.federalregister.gov/documents/2026/01/26/2026-01406/air-plan-approval-indiana-regional-haze-plan-for-the-second-implementation-period
58	MISO Tariff Module E-1	MISO Tariff Module E-1 – Resource Adequacy	https://docs.misoenergy.org/miso12-legalcontent/Module_E-1_-_Resource_Adequacy.pdf
59	[Omitted.]		
60	MISO Tariff Section 38.2.7	MISO Tariff Section 38.2.7	https://docs.misoenergy.org/miso12-legalcontent/Module_C_-_Energy_and_Operating_Reserve_Markets.pdf
61	MISO Tariff Attachment Y	MISO Tariff Attachment Y	https://docs.misoenergy.org/miso12-legalcontent/Attachment_Y_-_Notification_of_Potential_Resource_-_SCU_Change_of_Status.pdf
62	FERC Technical Conference Notice	FERC, *Meeting the Challenge of Resource Adequacy in Regional Transmission Organization and Independent System Operator Regions* (June 2, 2025)	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250602-3068&optimized=false&sid=457eb824-f5ed-41fa-a043-a0cd8c55cb4b
63	Palgrave Handbook	M. Hafner & G. Luciana, Palgrave Handbook of International Economics (2022) (excerpt)	https://link.springer.com/book/10.1007/978-3-030-86884-0

No.	Exhibit Name	Document Name	URL
64	IEA Report	International Energy Agency, The role of CCUS in low-carbon power systems (2020) (excerpt)	https://www.iea.org/reports/the-role-of-ccus-in-low-carbon-power-systems
65	DOE Transmission Planning Study	DOE, Nat'l Transmission Planning Study, Ch. 2: Long-Term U.S. Transmission Planning Scenarios (2024)	https://www.energy.gov/sites/default/files/2024-10/NationalTransmissionPlanningStudy-Chapter2.pdf
66	NERC 2024 Interregional Transfer Capability Study, Part 1	NERC, Interregional Transfer Capability Study: (ITCS) Strengthening Reliability Through the Energy Transformation, Transfer Capability Analysis (Part 1) (Aug. 2024)	https://www.nerc.com/pa/RAPA/Documents/ITCS_Part_1_Results.pdf
67	[Omitted.]		
68	Grid Strategies Sept. Report	Michael Goggin, *A Review of DOE's Second 202(c) Order for the Campbell Coal Plant* (Sept. 2025)	
69	IN Haze SIP Responses to Public Comments	Appendix V, Regional Haze State Implementation Plan Responses to Public Comments (Dec. 29, 2021)	https://downloads.regulations.gov/EPA-R05-OAR-2021-0963-0002/attachment_22.pdf
70	Konidena September Declaration	Declaration of Rao Konidena (Sept. 3, 2025) (including attachment)	

No.	Exhibit Name	Document Name	URL
71	NIPSCO 2018 IRP	Northern Indiana Public Company LLC 2018 Integrated Resource Plan, October 2018	https://www.in.gov/iurc/files/2018-NIPSCO-IRP.pdf
72A	NIPSCO 2021 IRP, part 1	Northern Indiana Public Company LLC 2021 Integrated Resource Plan (October 2021), PDF pp. 1–169	https://www.in.gov/iurc/files/NIPSCO_2021-Integrated-Resource-Plan-Document-1.pdf
72B	NIPSCO 2021 IRP, part 2	Northern Indiana Public Company LLC 2021 Integrated Resource Plan (October 2021), PDF pp. 170–324	(*Same as Exhibit 72A*)
73	NIPSCO May 2022 Investor Call	NiSource reports first quarter 2022 results	https://www.nisource.com/news/article/nisource-reports-first-quarter-2022-results-20220504
74	DOE 202(c) Webpage as of July 13, 2026	U.S. Dep't of Energy, DOE's Use of Federal Power Act Emergency Authority (last visited July 13, 2026)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
75	MISO Tariff Zonal Map	MISO, Attachment VV to FERC-Approved Tariff	https://etariff.ferc.gov/TariffBrowser.aspx?tid=1162
76	Secretary Wright's West Virginia Remarks	Charles Young, West Virginia News, *Energy Secretary Chris Wright: Future of U.S. Coal is "long and bright"* (July 5, 2025)	https://www.wvnews.com/news/wvnews/energy-secretary-chris-wright-future-of-u-s-coal-is-long-and-bright/article_948eb88e-2509-42a3-b985-07c47f1ee151.html
77	MISO 2021 Transmittal Letter	Transmittal Letter, FERC Docket No. ER22-495-000 (Nov. 30, 2021),	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20211130-5166

No.	Exhibit Name	Document Name	URL
		Accession No. 20211130-5166	
78	NiSource 2024 Annual Report	NiSource Inc. 2024 Annual Report (Form 10-K)	https://www.nisource.com/docs/librariesprovider2/sustainability-archives/2024/nisource-2024-annual-report.pdf?sfvrsn=2068f951_6
79	CenterPoint 2024 Annual Report	CenterPoint Energy, Inc. Form 10-K (2024 Annual Report) dated March 4, 2025	https://investors.centerpointenergy.com/static-files/b4884cf5-749f-46ad-9f89-3507d71a725c
80	CenterPoint Indiana 2025 IRP Summary	Executive Summary, CenterPoint Energy Indiana South 2025 Integrated Resource Plan	https://www.in.gov/iurc/files/CEIS_2025_IRP-Non-Technical_Summary.pdf
81	Joundi Testimony	Testimony of Zakaria Joundi, FERC Docket No. ER24-1638 (Mar. 28, 2024), Accession No. 20240328-5329 (Tab E)	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20240328-5329
82	MISO 2024–25 LOLE Study Report	MISO, Planning Year 2024-2025 Loss of Load Expectation Study Report (April 2024)	https://cdn.misoenergy.org/LOLE%20Study%20Report%20PY%202024-2025631112.pdf
83	MISO 2025–26 LOLE Study Report	MISO, Planning Year 2025-2026 Loss of Load Expectation Study Report (April 2025)	https://cdn.misoenergy.org/PY%202025-2026%20LOLE%20Study%20Report685316.pdf?v=20250313114401
84	MISO 2024–25 Auction Results	MISO, Planning Resource Auction Results for Planning Year 2024-25 (Corrected) (April 26, 2024)	https://cdn.misoenergy.org/2024%20PRA%20Results%20Posting%2020240425632665.pdf

No.	Exhibit Name	Document Name	URL
85	MISO Attributes Roadmap	MISO Attributes Roadmap (Dec. 2023)	https://cdn.misoenergy.org/2023%20Attributes%20Roadmap631174.pdf
86	MISO Attributes Roadmap Technical Appendix	MISO, Technical Appendix: Attributes Roadmap (June 2024)	https://cdn.misoenergy.org/2023%20Attributes%20Technical%20Appendix631176.pdf
87	MISO's Response to the Reliability Imperative	MISO's Response to the Reliability Imperative (Feb. 2024)	https://cdn.misoenergy.org/2024+Reliability+Imperative+report+Feb.+21+Final504018.pdf
88	Schahfer Waste Disposal Area Closure Plan	NIPSCO LLC R.M. Schahfer Generating Station Waste Disposal Area Closure Plan – Version #5 (October 2020)	https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/ccr/r.m.-schahfer/r.m.-schahfer-generating-station-closure-and-post-closure-care/r-m-schahfer-generating-station---waste-disposal-area-closure-plan.pdf?sfvrsn=78977151_8
89	2025 OMS-MISO Survey	2025 OMS-MISO Survey Results (June 6, 2025)	https://cdn.misoenergy.org/20250606%20OMS%20MISO%20Survey%20Results%20Workshop%20Presentation702311.pdf
90	MISO ERAS Transmittal Letter	Re: Midcontinent Independent System Operator, Inc. Revisions to the Open Access Transmission, Energy and Operating Reserve Tariff Expedited Resource Addition Study Filing, Docket No. ER25-2454-000 (June 6, 2025), Accession No. 20250606-5228	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250606-5228&optimized=false&sid=c2678d58-1762-48e9-bcca-059a2a848538
91	MISO ERAS Decision	Order Accepting Tariff Revisions, Subject to Condition, 192 FERC 61,064 (July 21, 2025)	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250721-3077&optimized=false&sid=c2678d58-1762-48e9-bcca-059a2a848538

No.	Exhibit Name	Document Name	URL
92	Energy Emergency EO	Exec. Order No. 14,156, 90 Fed. Reg. 8433, Declaring a National Energy Emergency (Jan. 29, 2025)	https://www.govinfo.gov/content/pkg/DCPD-202500123/pdf/DCPD-202500123.pdf
93	Grid EO	Exec. Order No. 14,262, 90 Fed. Reg. 15521, Strengthening the Reliability and Security of the U.S. Electric Grid (Apr. 14, 2025)	https://www.federalregister.gov/documents/2025/04/14/2025-06381/strengthening-the-reliability-and-security-of-the-united-states-electric-grid
94	NY Times Coal Article	Brad Plumer & Mira Rojanasakul, *Trump Signs Orders Aimed at Reviving a Struggling Coal Industry*, NY Times (Sept. 3, 2025).	https://www.nytimes.com/2025/04/08/climate/trump-order-coal-mining.html
95	EIA Table 8.4	U.S. Energy Information Administration Electric Power Annual, Table 8.4: Average power plant operating expenses for major U.S. investor-owned electric utilities	https://www.eia.gov/electricity/annual/table.php?t=epa_08_04.html
96	July 2025 Resource Adequacy Report	DOE, Resource Adequacy Report: Evaluating the Reliability and Security of the United States Grid (July 2025)	https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%29.pdf
97	DOE July 7, 2025 Press Release	*DOE, Department of Energy Releases Report on Evaluating U.S. Grid Reliability and Security* (July 7, 2025)	https://www.energy.gov/articles/department-energy-releases-report-evaluating-us-grid-reliability-and-security

No.	Exhibit Name	Document Name	URL
98	Culley East Ash Pond Closure Plan	Southern Indiana Gas and Electric Company Written Closure Plan 257.102(b) and (d) for the East Ash Pond at the F.B. Culley Generating Station, Revision 1 (September 2021)	https://www.centerpointenergy.com/en-us/Documents/CCR-Reporting/Culley-Station-Closure/Culley-East-Closure-Plan-Rev-1.pdf
99	RFR of July Resource Adequacy Report	Motion to Intervene and Request for Rehearing of Natural Resources Defense Council, the Ecology Center, Environmental Defense Fund, Environmental Law and Policy Center, Public Citizen, Sierra Club, and Vote Solar, DOE Resource Adequacy Report (Aug. 8, 2025).	https://sustainableferc.org/wp-content/uploads/2025/08/2025-08-06_NRDC-et-al-Request-for-Rehearing-DOE-Resource-Adequacy-Report.pdf
100A	NIPSCO 2024 IRP, part 1	Northern Indiana Public Service Company LLC 2024 Integrated Resource Plan (Dec. 9, 2024), PDF pages 1–119	https://www.in.gov/iurc/files/NIPSCO-2024-Integrated-Resource-Plan-Document.pdf
100B	NIPSCO 2024 IRP, part 2	Northern Indiana Public Service Company LLC 2024 Integrated Resource Plan (Dec. 9, 2024), PDF pages 120–239	(*Same as Exhibit 100A*)
100C	NIPSCO 2024 IRP, part 3	Northern Indiana Public Service Company LLC 2024 Integrated Resource Plan (Dec. 9, 2024), PDF pages 240–358	(*Same as Exhibit 100A*)

No.	Exhibit Name	Document Name	URL
101	Schahfer Title V Permit Modification, Feb. 2025	Northern Indiana Public Service Company LLC - R.M. Schahfer Generating Station, Significant Permit Modification No. 073-48085-00008, February 4, 2025	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83755127&dDocName=83759170&Rendition=web&allowInterrupt=1&noSaveAs=1
102	MISO Attachment Y Response to NIPSCO	NIPSCO Notice of Planned Participation under 40 C.F.R. 423.19(h), Oct. 29, 2025 (including letter from MISO dated Feb. 3, 2023)	https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/elg/schahfer-notice-of-planned-participation---elg-rule-2034-subcategory.pdf?sfvrsn=58f9f251_1
103	NIPSCO 2019 Rate Order	IURC Order, Cause No. 45159, Dec. 4, 2019	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/ac4c36e7-ae16-ea11-a997-001dd800b582/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45159%20ORDER%20201912041017168 36.pdf
104	NIPSCO 2023 Rate Order	IURC Order, Cause No. 45772, Aug. 2, 2023	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/a4adc395-4031-ee11-bdf4-001dd80abde3/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_45772_080223.pdf
105	DOE Order No. 202-08-1	DOE Order No. 202-08-1 (Sept. 14, 2008)	https://www.energy.gov/sites/prod/files/202%28c%29%20order%20202-08-1%20September%2014%2C%202008%20-%20CenterPoint%20Energy.pdf
106	NIPSCO 2025 Rate Order	IURC Order, Cause No. 46120, June 26, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/05bff4f4-a952-f011-877a-001dd80b1717/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_46120_062625.pdf
107	Vectren 2014 IRP	Vectren Energy Delivery of Indiana, Inc. 2014 Integrated Resource Plan, November 2014	https://www.in.gov/iurc/files/SIGECO-Vectren_2014_IRP_Report.pdf

No.	Exhibit Name	Document Name	URL
108	Vectren 2016 IRP	Vectren Energy Delivery of Indiana, Inc. 2016 Integrated Resource Plan, December 2016	https://www.in.gov/iurc/files/SIGECO-2016-IRP.pdf
109	Culley East Ash Pond Extension Demonstration	Southern Indiana Gas and Electric Company Request for Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment (November 2020)	https://www.centerpointenergy.com/en-us/Documents/CCR-Reporting/Culley-Station-Closure/Culley-East-Site-Specific-Alternative-to-Initiate-Closure_FINAL.pdf
110	DOE Order No. 202-24-1	DOE Order No. 202-24-1 (Oct. 9, 2024)	https://www.energy.gov/sites/default/files/2024-10/Duke%20202%28c%29%20Order_100924%20FINAL_JMG%20signed.pdf
111	[Omitted.]		
112	Witmeier 2024 Queue Cap Testimony	Errata to Att. X Queue Cap Proposal and Exemptions to Queue Cap, Tab A, Prepared Direct Testimony of Andrew Witmeier, at 21:4, Docket No. ER25-507-000 (Nov. 21, 2024) ("Witmeier 2024 Queue Cap Testimony"), Accession No. 20241213-5063.	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20241213-5063&optimized=false&sid=1e90ede4-da17-4482-8e6d-e346192d0609
113	Inst. Pol'y Integrity Report	Inst. Pol'y Integrity, Enough Energy: A Review of DOE's Resource Adequacy Methodology (July 2025)	https://policyintegrity.org/files/publications/IPI_EnoughEnergy_FinalReport.pdf

No.	Exhibit Name	Document Name	URL
114	IURC 2019 CCGT Order	IURC Order, Cause No. 45052, April 24, 2019	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/4dfb39e0-9f66-e911-8151-1458d04ef938/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45052_ord_20190424102046480.pdf
115	Vectren 2020 IRP	Vectren 2019/2020 Integrated Resource Plan, June 2020	https://www.in.gov/iurc/files/2019-2020-Vectren-IRP-Volume-1-of-2.pdf
116	CenterPoint 2023 IRP	CenterPoint Energy Indiana South 2022/2023 Integrated Resource Plan, May 2023	https://www.in.gov/iurc/files/2022-2023-CNP-IRP-Volume-1-of-2-Redacted.pdf
117	RTO Insider Article	John Cropley & Amanda Durish Cook, DOE Orders Mich. Coal Plant to Remain Available Another 90 Days, RTO Insider (Aug. 21, 2025).	https://www.rtoinsider.com/113044-doe-orders-mich-coal-plant-to-remain-available-another-90-days/
118	RMI Analysis of Coal Plants' Threats to Reliability	Gabriella Tosado, Ashtin Massie & Joe Daniel, *Reality Check: We Have What's Needed to Reliably Power the Data Center Boom, and It's Not Coal Plants*, RMI (Aug. 12, 2025)	https://rmi.org/reality-check-we-have-whats-needed-to-reliably-power-the-data-center-boom-and-its-not-coal-plants/
119	MISO, ZRC Replacement Guidance	ZRC replacement and instructions in the MECT, Resource Adequacy Subcommittee (May 5, 2023	https://cdn.misoenergy.org/20230524%20RASC%20Item%2004b%20ZRC%20Replacement628921.pdf
120	2024 OMS-MISO Survey	2024 OMS-MISO Survey Results (June 20, 2024)	https://cdn.misoenergy.org/20240620%20OMS%20MISO%20Survey%20Results%20Workshop%20Presentation635585.pdf

No.	Exhibit Name	Document Name	URL
121	Witmeier 2025 ERAS Testimony	Prepared Direct Testimony of Andrew Witmeier, FERC Docket No. ER25-2454-000, (June 6, 2025), Accession No. 20250606-5228	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20250606-5228
122	GridLab Report	GridLab Analysis: Department of Energy Resource Adequacy Report (July 11, 2025)	https://gridlab.org/gridlab-analysis-department-of-energy-resource-adequacy-report/
123	Duke University Rethinking Load Growth Study	Tyler H. Norris et al., Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems, Duke University Nicholas Institute for Energy, Environment & Sustainability (Feb. 2025)	https://nicholasinstitute.duke.edu/sites/default/files/publications/rethinking-load-growth.pdf
124	November Campbell Order	DOE Order No. 202-25-9 (November 18, 2025)	https://www.energy.gov/sites/default/files/2025-11/Order%20No%20202-25-9.pdf
125	IURC AB Brown CT Order	IURC Order, Cause No. 45664, June 28, 2022	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/1b5e5448-13f7-ec11-bb3b-001dd80095d7/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_45564_062822%20.pdf
126	IURC 2025 CenterPoint Rate Order	IURC Order, Cause No. 45990, Feb. 3, 2025	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/4355f179-6be2-ef11-8eea-001dd8067cf7/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_45990_020325.pdf
127	Chrissy Behme Testimony	Direct Testimony of Chrissy M. Behme on behalf of CenterPoint Energy Indiana South,	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/63d5d9a2-4594-ee11-8178-001dd8065be9/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45990_CEI%20South_E

No.	Exhibit Name	Document Name	URL
		Cause No. 45990, Dec. 5, 2023	x%202%20-%20Behme%20(PUBLIC)_120523.pdf
128	[Omitted.]		
129	Energy Innovation Report	Eric G. Gimon, Senior Fellow, Energy Innovation, *Dodging the Firm Fixation for Data Centers and the Grid* (Nov. 2025)	https://energyinnovation.org/wp-content/uploads/Dodging-the-Firm-Fixation-for-Data-Centers-and-the-Grid.pdf
130	NERC Emergency Operations	N. Am. Elec. Reliab.Corp., EOP-011-4 Emergency Operations (last visited Jan. 8, 2026)	https://www.nerc.com/globalassets/standards/reliability-standards/eop/eop-011-4.pdf
131	Eddystone November Order	DOE Order No. 202-25-10 (Nov. 25, 2025)	https://www.energy.gov/sites/default/files/2025-11/Order%20No.%20202-25-10.pdf
132	NIPSCO Rate Case Discovery Responses	NIPSCO Responses to Indiana Office of the Utility Consumer Counselor's Ninth Set of Data Requests in IURC Cause No. 46120, Nov. 4, 2024	
133	Department Press Release on Centralia Order	U.S. Dep't of Energy, Energy Secretary Ensures Washington Coal Plant Remains Open to Ensure Affordable, Reliable and Secure Power Heading into Winter(Dec. 17, 2025)	https://www.energy.gov/articles/energy-secretary-ensures-washington-coal-plant-remains-open-ensure-affordable-reliable-and

No.	Exhibit Name	Document Name	URL
134	MISO Manual on Resource Adequacy	MISO, BPM-011-r31, *Resource Adequacy Business Practices Manual* (Feb. 21, 2025)	https://www.misoenergy.org/legal/rules-manuals-and-agreements/business-practice-manuals/
135	Holtec News Release	Holtec Int'l, *Holtec Receives Coveted "Tier 1 First Mover Award" from the USDOE to Accelerate Deployment of its Dual-Unit SMR-300 Plant at the Company's Palisades Energy Site* (Dec. 2, 2025)	https://holtecinternational.com/hh-40-24/
136	Utility Dive Article on Palisades Plant	Meris Lutz, UtilityDive, *Palisades Becomes First Decommissioned US Nuclear Plant to Reach 'Operations' Status* (Aug. 28, 2025)	https://www.utilitydive.com/news/palisades-nuclear-plant-holtec-nrc-operations/758845/
137	R Street Institute Commentary: *DOE "Zombies" Are Eating Competitive Power Markets*	Michael Giberson, Senior Fellow, R Street Institute, *Low-Energy Fridays: DOE "Zombies" Are Eating Competitive Power Markets* (Nov. 13, 2025)	https://www.rstreet.org/commentary/low-energy-fridays-doe-zombies-are-eating-competitive-power-markets/
138	MISO Fall 2025 Operations Report	Bd. of Directors Mkts. Committee, MISO, *Operations Report* (Dec. 9, 2025)	https://cdn.misoenergy.org/20251209%20Markets%20Committee%20of%20the%20BOD%20Item%2006%20MISO%20Operations%20Report730265.pdf
139	Report of the Nat'l Energy Pol'y Dev. Grp	*Reliable, Affordable, and Environmentally Sound Energy for America's Future*: Report of the National Energy Policy Development Group (May 2001)	https://www.nrc.gov/docs/ml0428/ml042800056.pdf

No.	Exhibit Name	Document Name	URL
140	MISO ERAS December Release	MISO, *MISO Announces Second Cycle of ERAS Projects* (Dec. 1, 2025)	https://www.misoenergy.org/meet-miso/media-center/2025---news-releases/miso-announces-second-cycle-of-eras-projects
141	[Omitted.]		
142	Energy Reliability and Resilience	U.S. Dep't of Energy, Energy Reliability and Resilience (webpage as of Oct. 21, 2025)	https://web.archive.org/web/20251021071021/https:/www.energy.gov/eere/energy-reliability-and-resilience
143	NERC 2025–2026 Winter Reliability Assessment	NERC, *2025–2026 Winter Reliability Assessment* (Nov. 18, 2025)	https://www.nerc.com/globalassets/our-work/assessments/nerc_wra_2025.pdf
144	[Omitted.]		
145	NERC Email	Email from NERC Communications Announcements to Rachel Sherrard et al. Re: Announcement | NERC 2025-2026 Winter Reliability Assessment | Rising Demand, Evolving Resources Continue to Challenge Winter Grid Reliability (Nov. 18, 2025 at 2:02:44 PM EST)	
146	[Omitted.]		

No.	Exhibit Name	Document Name	URL
147	Schahfer 2024 Groundwater Monitoring Report	Northern Indiana Public Service Company LLC, R.M. Schahfer Generating Station Waste Disposal Area 2024 Annual Groundwater Monitoring and Corrective Action Report	https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/ccr/r.m.-schahfer/r.m.-schahfer-generating-station-groundwater-moniitoring-and-corrective-action/2025-rm-schahfer-generating-station-waste-disposal-area-annual-groundwater-monitoring-and-corrective-action-report.pdf?sfvrsn=1fc2fa51_3
148	Culley 2024 Groundwater Monitoring Report	Southern Indiana Gas and Electric Company Annual Groundwater Monitoring and Corrective Action Report, East Ash Pond, F.B. Culley Generating Station, January 2025	https://www.centerpointenergy.com/en-us/Documents/CCR-Reporting/Culley-Station-Groundwater-Monitoring/Culley_East_Ash_Pond_Annual_GroundWater_Report_2025.pdf
149	New York Times Article on Trump's Coal Plant Policy	Claire Brown and Brad Plumer, New York Times, *Trump Wants to Halt Almost All Coal Plant Shutdowns. It Could Get Messy* (Jan. 16, 2026)	https://www.nytimes.com/2026/01/16/climate/trump-coal-plants.html
150	May Campbell Order	DOE Order No. 202-25-3 (May 23, 2025)	https://www.energy.gov/sites/default/files/2025-05/Midcontinent%20Independent%20System%20Operator%20%28MISO%29%20202%28c%29%20Order_1.pdf
151	August Campbell Order	DOE Order No. 202-25-7, August 20,, 2025	https://www.energy.gov/sites/default/files/2025-08/MISO%20Order%20No.%20202-25-7.pdf
152	CenterPoint Rate Case Discovery Responses	IURC Cause No. 45990, CenterPoint Energy Indiana South Responses to the Indiana Office of	

No.	Exhibit Name	Document Name	URL
		the Utility Consumer Counselor's Twenty-Sixth Set of Data Requests	
153	Wayne Games 2018 Testimony	IURC Cause No. 45052, Public Rebuttal Testimony of Wayne D. Games on behalf of Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc., Sep. 10, 2018	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/e4ded2b4-c5b5-e811-8144-1458d04ef938/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45052%20VectrenSouth%20PublicExhibit4RRebuttalTestimonyWayneGames%20091018.pdf
154	EPA COBRA Schahfer Retirement Analysis	U.S. Environmental Protection Agency, CO-Benefits Risk Assessment (COBRA) for nationwide benefit based on reduction of annual emissions from Schahfer 17 and 18	
155	EPA COBRA Culley Retirement Analysis	U.S. Environmental Protection Agency, CO-Benefits Risk Assessment (COBRA) for nationwide benefit based on reduction of annual emissions from Culley 2	
156	CenterPoint Cost Allocation Complaint	Southern Indiana Gas and Electric Company, Complaint Requesting Fast Track Processing, FERC Docket No. EL26-38-000, Jan. 5, 2026	https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20260105-5189
157	MISO Comments to FERC	Answer of the Midcontinent Independent System Operator, Inc., FERC	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20260120-5226&optimized=false&sid=07e217b3-76d9-4e6a-9a2b-99ee7f2229d4

No.	Exhibit Name	Document Name	URL
		Docket No. EL26-36-000, Jan. 20, 2026	
158	March Schahfer Order	U.S. Department of Energy's March 23, 2026 Emergency Order No. 202-26-19	https://www.energy.gov/documents/doe-order-no-202-26-19-schahfer
159	March Culley Order	U.S. Department of Energy's March 23, 2026 Emergency Order No. 202-26-20	https://www.energy.gov/documents/doe-order-no-202-26-20-culley
160	Department Order No. 202-26-01	U.S. Department of Energy's January 24, 2026 Emergency Order No. 202-26-01	https://www.energy.gov/documents/order-no-202-26-01-ercot
161	Department Order No. 202-26-01A	U.S. Department of Energy's January 25, 2026 Amended Emergency Order No. 202-26-01a	https://www.energy.gov/documents/amended-order-no-202-26-01a
162	Department Order No. 202-26-03	U.S. Department of Energy's January 25, 2026 Emergency Order No. 202-26-03	https://www.energy.gov/documents/order-no-202-26-03-iso-ne
163	DOE Order No. 202-22-2 Amendment No. 1	U.S. Department of Energy's September 8, 2022 Emergency Order No. 202-22-2 Amendment No. 1	https://www.energy.gov/sites/default/files/2022-09/Amendment%20No.%201%20to%20Order%20202-22-2%20sb%20A_S3%20Hogan.pdf
164	Starfield Email to Hoffman	Email from Lawrence Starfield, EPA to Patricia Hoffman, DOE Re: DOE section 202(c) order (Sept. 11, 2017)	https://www.energy.gov/sites/default/files/2017/09/f36/2017-9-11%20EPA%20consultation%20renewal.pdf

No.	Exhibit Name	Document Name	URL
165	February 2026 Campbell Order	U.S. Department of Energy's February 17, 2026 Emergency Order No. 202-26-16	https://www.energy.gov/documents/order-no-202-26-16-campbell
166	Grid Strategies LTRA Review	Adria E. Brooks et. al., *Review of NERC's 2025 Long-Term Reliability Assessment,* Grid Strategies (Mar. 5, 2026)	https://gridstrategiesllc.com/wp-content/uploads/FINAL-2025-LTRA-Review.pdf
167	DOE Order No. 202-22-1 Amendment No. 2	U.S. Department of Energy's September 8, 2022 Emergency Order No. 202-22-1 Amendment No. 2	https://www.energy.gov/sites/default/files/2022-09/Amendment%202%20to%20Order%202022-22-1_FINAL_9.8.2022%20sb%20A_S3%20Hogan.pdf
168	PIOs' January Rehearing Request	Motion to Intervene and Request for Rehearing and Stay of Public Interest Organizations, Department of Energy Order Nos. 202-25-12, 202-25-13 (Jan. 22, 2026)	https://www.energy.gov/documents/motion-intervene-and-request-rehearing-and-stay-sierra-club-citizens-action-coalition
169	CenterPoint Letter to USDOE	Letter from CenterPoint Energy to United States Department of Energy dated Feb. 17, 2026	
170	MISO 2026–2027 Planning Auction Timeline	Appendix K – Resource Adequacy Timeline for activities for the Planning Year 2026-2027	https://cdn.misoenergy.org/PY%2026-27%20RA%20Timeline720494.pdf
171	MISO ERAS March Release	"MISO accelerates resource additions with third ERAS cycle" (Mar. 9, 2026)	https://www.misoenergy.org/meet-miso/media-center/2026---news-releases/miso-accelerates-resource-additions-with-third-eras-cycle

No.	Exhibit Name	Document Name	URL
172	ERAS Interconnection Requests	ERAS Interconnection Requests as of March 24, 2026	https://cdn.misoenergy.org/ERAS%20Interconnection%20Requests718481.pdf?v=20250925100448
173	Konidena April Declaration	Declaration of Rao Konidena (Apr. 17, 2026) (including attachment)	
174	Saffran Q4 2025 Outage Testimony	Direct Testimony of David Saffran on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 150, Feb. 16, 2026	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/2cec3529-6e0b-f111-8406-001dd80babc6/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC150_NIPSCO_Petitioners%20Exhibit%204%20(Saffran)_02162026.pdf
175	Wagner February Testimony	Direct Testimony of John A. Wagner on behalf of Northern Indiana Public Service Company LLC, IURC Cause No. 38706 FAC 150, Feb. 16, 2026	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/209c4c11-6e0b-f111-8406-001dd80babc6/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38706FAC150_NIPSCO_Petitioners%20Exhibit%203%20(Wagner)_02162026.pdf
176	MISO 2026–2027 CIL/CEL Results	MISO Planning Year 2026–2027 Capacity Import Limit / Capacity Export Limit Results (Oct. 30, 2025)	https://cdn.misoenergy.org/20251030%20LOLEWG%20Item%2004%20PY%202026-2027%20CIL_CEL%20Results724589.pdf
177	NERC January 2026 LTRA	Long-Term Reliability Assessment, January 2026, North American Electric Reliability Corporation	https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf
178	Curran Testimony	Statement of Jennifer Curran, Senior Vice President for Planning and Operations,	https://democratsenergycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov

No.	Exhibit Name	Document Name	URL
		Midcontinent Independent System Operator)	
179	RTO Insider March 2026 Article	MISO: NERC to Dial Down RTO's Risk Level; Members Create Large Load Working Group	https://www.rtoinsider.com/128949-miso-nerc-will-lower-risk-level-stakeholders-create-large-load-working-group
180	IURC March 2026 Public Meeting	Excerpt in .MP4 format of video recording of IURC March 2026 Investigative Inquiry on Energy Affordability (Mar. 24, 2026), beginning at 3:45:19 timestamp	https://www.youtube.com/watch?v=uXEwNQdi3r0
181	MISO January Filing	Answer of the Midcontinent Independent System Operator, Inc., FERC Docket No. EL26-38-000 (Jan. 26, 2026)	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20260126-5150&optimized=false&sid=17118e9c-5237-458d-b087-880602d58476
182	2026 DOE 202(c) Orders Webpage	U.S. Department of Energy Office of Cybersecurity, Energy Security, and Emergency Response, 2026 Section 202(c) Orders Webpage (last visited July 13, 2026)	https://www.energy.gov/ceser/2026-doe-202c-orders
183	MISO January Operations Report	MISO Monthly Operations Report, January 2026	https://cdn.misoenergy.org/202601%20Market%20and%20Operations%20Report742938.pdf

No.	Exhibit Name	Document Name	URL
184A	Schahfer Landfill 2025 Groundwater Monitoring Report, Part 1	September 2025 Semi-Annual Groundwater Monitoring Report, Schahfer RWS I Landfill (Nov. 10, 2025), pages 1–194	https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83889189&dDocName=83893231&Rendition=web&allowInterrupt=1&noSaveAs=1
184B	Schahfer Landfill 2025 Groundwater Monitoring Report, Part 2	September 2025 Semi-Annual Groundwater Monitoring Report, Schahfer RWS I Landfill (Nov. 10, 2025), pages 195–299	(*Same as Exhibit 184A*)
185	MISO 2026–27 Auction Results	MISO, *Planning Resource Auction Results for Planning Year 2026/27* (updated May 2026)	https://cdn.misoenergy.org/2026%20PRA%20Results%20Posting%2020260522%20-%20Corrections754715.pdf
185A	MISO 2026–27 Auction Results - (Original)	MISO, *Planning Resource Auction Results for Planning Year 2026/27* (Apr. 2026)	https://web.archive.org/web/20260428224944/https://cdn.misoenergy.org/2026%20PRA%20Results%20Posting%20260428754715.pdf
186	2026 OMS-MISO Survey	OMS & MISO, *2026 OMS-MISO Survey Results* (June 4, 2026)	https://cdn.misoenergy.org/20260604%20OMS-MISO%20Survey%20Results%20Workshop%20Presentation761711.pdf
187	NERC 2025 LTRA Update	NERC, *2025 LTRA Sensitivity Case: Addition of ERAS Resources in the MISO Assessment Area* (Apr. 2026)	https://www.nerc.com/globalassets/our-work/assessments/2025-ltra-sensitivity-miso-eras.pdf
188	Barrons Article	Laura Sanicola, *Who's Paying to Keep Coal Plant Alive? All Electricity Customers,*	https://www.msn.com/en-us/money/markets/who-s-paying-to-keep-coal-plant-alive-all-electricity-customers-trump-advisor-says/ar-AA1UdRHI

No.	Exhibit Name	Document Name	URL
		Trump Advisor Says, Barrons, (Jan. 14, 2026)	
189	NERC 2026 Summer Reliability Assessment	NERC, *2026 Summer Reliability Assessment* (May 2026)	https://www.nerc.com/globalassets/our-work/assessments/nerc_sra_2026.pdf
190	MISO ERAS Cycle 4 Release	MISO, *MISO accelerates resource additions with fourth ERAS cycle: 3.3 GW of proposed capacity will strengthen reliability and meet growing demand* (May 27, 2026)	https://www.misoenergy.org/meet-miso/media-center/2026---news-releases/miso-accelerates-resource-additions-with-fourth-eras-cycle/
191	June Schahfer Order	U.S. Department of Energy's June 18, 2026 Emergency Order No. 202-26-29	https://www.energy.gov/documents/doe-order-no-202-26-29
192	June Culley Order	U.S. Department of Energy's June 18, 2026 Emergency Order No. 202-26-30	https://www.energy.gov/documents/doe-order-no-202-26-30
193	PIOs' April Rehearing Request	Motion to Intervene and Request for Rehearing and Stay of Public Interest Organizations, Department of Energy Order Nos. 202-26-19, 202-26-20 (Apr. 22, 2026)	https://www.energy.gov/documents/motion-intervene-and-request-rehearing-and-stay-public-interest-organizations-202-26-19
194	IURC 2026 Summer Reliability Forum	Excerpt in .MP4 format of video recording of IURC 2026 Summer Reliability Forum (May 19, 2026), beginning at 05:01:08 timestamp	https://www.youtube.com/watch?v=MdJIjHZEJt4&t=1s

No.	Exhibit Name	Document Name	URL
195	NIPSCO Summer 2026 Reliability Presentation	NIPSCO Presentation to Indiana Utility Regulatory Commission 2026 Summer Reliability Forum	https://www.in.gov/iurc/files/9.-SRF_26_NIPSCO.pdf
196	NIPSCO 2026 Planning Reserve Margin Report	NIPSCO 2025 Annual Report in Compliance With Ind. Code § 8-1-8.5-13	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/caba62ef-8645-f111-88b4-001dd80bcf22/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=NIPSCO_Submission%20of%20Redacted%20Report_05012026.pdf
197	CenterPoint 2026 Planning Reserve Margin Report	CenterPoint Energy Indiana South 2025 HEA 1520 Report Pursuant to I.C. § 8-1-8.5-13 (May 23, 2025)	https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/2e6ca60a-4b4a-f111-88b4-001dd80673f1/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=46403_CEIS_Notice%20of%20Submission%20of%20HEA%201520%20Report_050726.pdf
198	McFarlane Testimony	Testimony of Shawn McFarlane, FERC Docket No. ER22-495 (Nov. 30, 2021), Accession No. 20211130-5166 (Tab C)	https://elibrary.ferc.gov/eLibrary/filelist?accession_Number=20211130-5166
199	MISO Winter Storm Fern Summary	MISO, Reliability Subcommittee, Overview of Winter Storm Fern (Feb. 17, 2026)	https://cdn.misoenergy.org/20260217%20RSC%20Item%2005%20Winter%20Storm%20Fern%20Report741721.pdf
200	CenterPoint Culley Discovery Response	IURC Cause No. 46350, CenterPoint Response to CAC Data Request 2-1(c), July 6, 2026	
201	(January 2026 EPA CAMPD Data)	EPA, Clean Air Markets Program Data (CAMPD), hourly emissions data by unit for the Schahfer and Culley Plants (1/20/2026-1/31/2026)	https://campd.epa.gov/data/customdata-download. To access hourly emissions data, select "emissions" from the "data type" menu; select "hourly emissions" from the "data subtype" menu; and then select "apply." On the next screen, set 01/20/2026 as the start date and 01/31/2026 as the end date; search for and select "F B Culley Generating Station (1012)" and "R M

No.	Exhibit Name	Document Name	URL
			Schahfer Generating Station (6085)" from the "facility" menu; deselect "Operating Hours Only"; and then select "apply."

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 203
September Schahfer Order

Department of Energy
Washington, DC 20585

Northern Indiana Public Service Company LLC and
Midcontinent Independent System Operator, Inc.
Regarding R.M. Schahfer Generating Station

Order No. 202-26-46

Pursuant to the authority vested in the Secretary of Energy (Secretary) by section 202(c) of the Federal Power Act (FPA),[1] and section 301(b) of the Department of Energy (DOE or the Department) Organization Act,[2] and for the reasons set forth below, I hereby determine that an emergency exists in portions of the Midcontinent Independent System Operator (MISO) region due to a sudden increase in demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy, and other causes. Issuance of this Order will meet the emergency and serve the public interest.

BACKGROUND

The R.M. Schahfer Generating Station (Schahfer) is an electric generating facility in Wheatfield, Indiana. Schahfer is owned and operated by Northern Indiana Public Service Company (NIPSCO), a division of NiSource Inc. Schahfer consists of two 129 MW natural-gas fired electric generating units and two coal-fired electric generating units, Unit 17 (423.5 MW) and Unit 18 (423.5 MW), with a combined nameplate capacity of 1,105 MW.[3] Units 17 and 18 began operations in 1983 and 1986, respectively. They were both slated to cease operations in December 2025.[4]

Order Nos. 202-25-12, 202-26-19, and 202-26-29, issued pursuant to FPA section 202(c), required that Schahfer Unit 17 and Unit 18 remain in operation for 90 days, until March 23, 2026, June 21, 2026, and September 19, 2026, respectively.

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[1] 16 U.S.C. § 824a(c).

[2] 42 U.S.C. § 7151(b).

[3] U.S. Energy Info. Admin., *Form EIA-860 detailed data with previous form data (EIA-860A/860B)*, *)*, https://www.eia.gov/electricity/data/eia860/ (click "2025 (early release)").

[4] It likely would be difficult for the coal-fired units to resume operations once retired. Specifically, practical issues, such as employment, contracts, and permits, may greatly increase the timeline for resumption of operations during the period they are needed. Moreover, if NIPSCO were to begin disassembling the units or other related facilities, the associated challenges would be greatly exacerbated. The costs and time of decommissioning a coal plant are extensive, and restarting such decommissioned plants would presumably cost the same as decommissioning in dollars and time, if not more. Thus, continuous operation is required in such cases so long as the Secretary determines a shortage exists and is likely to persist. *See* Jennifer Lessick, et al., *Bus. Models for Coal Plant Decommissioning*, at 9-12 (DOE, Pac. Nw. Nat'l Lab'y, Report, Aug. 2021), https://www.pnnl.gov/main/publications/external/technical_reports/PNNL-31348.pdf.

Those orders were based on my determination that emergency conditions existed in the region served by MISO.

Specifically, I determined that MISO faced tight reserve margins due to well-documented year-round resource adequacy concerns, particularly during periods of high demand or low generation resource output.[5] I determined that the continued operation of Schahfer Units 17 and 18 would provide additional generation capacity during these periods, which would help prevent the loss of power to homes and businesses in the areas that might have been affected by curtailments or outages that would otherwise pose a risk to public health and safety.[6] I determined that the continued operation of Schahfer Units 17 and 18 was necessary to alleviate immediate and anticipated threats to reliability.[7]

My determination was based on several facts. First, in its 2024 Long-Term Reliability Assessment (2024 LTRA), the North American Electric Reliability Corporation (NERC) notes that the MISO assessment area, which covers portions of Arkansas, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, Montana, North Dakota, South Dakota, Texas, and Wisconsin, is at an elevated risk, "because probabilistic assessments indicate above-normal generator outages during extreme weather can result in unserved energy or load loss. With uncertainty around new resource additions and existing generator retirements, MISO is also at risk of falling below [Reference Margin Levels] within the next five years."[8] Additionally, the 2024 LTRA notes that "[t]he departure of MISO's coal fleet has continued with a reduction in capacity of around 6 GW in the past year, and a projected reduction of a further 12 GW over the next five years."[9]

CONTINUING EMERGENCY CONDITIONS

The emergency conditions that necessitated the issuance of Order Nos. 202-25-12, 202-26-19, and 202-26-29 continue, both in the near and long term. The production of electricity from Schahfer Units 17 and 18 continue to be a critical asset to maintain reliability in MISO. MISO's resource adequacy concerns were recently demonstrated during Winter Storm Fern, when Schahfer operated under a cold weather alert and declared conservative operations from January 23 through February 1, 2026. On January 24, MISO declared an Energy Emergency Alert (EEA) 1, as well as an EEA 2 "MaxGen" event for MISO's North and Central Regions due to generation outages, high demand,

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[5] *See, e.g.*, *Midcontinent Indep. Sys. Operator, Inc*, DOE Order No. 202-26-29, at 2–5 (June 18, 2026,).

[6] *See, e.g.*, *id.*

[7] *See, e.g.*, *id.* at 5.

[8] N. Am. Elec Reliability Corp., *2024 Long-Term Reliability Assessment*, at 13 (Dec. 2024, corrected July 11, 2025), https://www.nerc.com/globalassets/our-work/assessments/2024-ltra_corrected_july_2025.pdf.

[9] *Id.* at 44.

and transfer capability limits.[10] From January 21–February 1, 2026, Schahfer Units 17 and 18 operated at roughly 285 MW almost every day.[11] According to the EIA-923 Power Plant Operations Report's monthly generation data for June 2026, the total net generation for Schahfer Units 17 and 18 was 303,344 MWh from January 2026 to June 2026 for an average of 50,557.3 MWh per month.[12] This generation data indicates that Schahfer Units 17 and 18 are providing vital generation capacity to the region.

MISO's year-round resource adequacy concerns are well-documented. MISO requested that the Federal Energy Regulatory Commission (FERC) approve its filing to revise its resource adequacy construct (including the Planning Resource Auction or PRA) to establish capacity requirements for each of the four seasons of the year rather than on an annual basis determined by peak summer demand.[13] MISO justified this revision by explaining that "[r]eliability risks associated with [r]esource [a]dequacy have shifted from 'Summer only' to a year-round concern."[14] MISO noted that over 60% of all "MaxGen" events (events when MISO initiates emergency procedures because of concerns over the adequacy of available generation) occurred outside of the summer season.[15]

In December 2023, MISO released an "Attributes Roadmap," in which it presented "an in-depth look at the challenges of operating a reliable bulk electric system in a rapidly transforming energy landscape."[16] Among other things, this report described changes in the time of year during which the risk of the loss of load was greatest. For the 2023 –2024 Planning Year, the greatest risk of loss of load was in the summer, but it is expected that by the summer of 2027, there will be an equal loss of load risk in both the summer and fall seasons.[17] MISO also projected that the risk of loss of load in the winter

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[10] MISO, *Operations Rep.*, at 10 (Mar. 24, 2026), https://cdn.misoenergy.org/20260324%20Markets%20Committee%20of%20the%20BOD%20Item%2008%20MISO%20Operations%20Report746763.pdf.

[11] DOE, *FACT SHEET: Energy Dep't Prevented Blackouts & Saved Am. Lives During Winter Storms* (Feb. 6, 2026), https://www.energy.gov/articles/fact-sheet-energy-department-prevented-blackouts-saved-american-lives-during-winter-storms.

[12] *See* EIA, *Form EIA-923 detailed data with previous form data (EIA-906/920)*, https://www.eia.gov/electricity/data/eia923/ (choose "2026: EIA-923 May 2026").

[13] *Midcontinent Indep. Sys. Operator, Inc.*, Transmittal Letter, FERC Dkt. No. ER22-495-000 (filed Nov. 30, 2021). FERC accepted MISO's proposed tariff revisions on August 31, 2022. *See also Midcontinent Indep. Sys. Operator, Inc.*, 180 FERC ¶ 61,141 (2022), *order on reh'g & compliance*, 182 FERC ¶ 61,096 (2023).

[14] *MISO*, Transmittal Letter, FERC Dkt. No. ER22-495-000, at 3.

[15] *Id.* at 3–4.

[16] MISO, *Attributes Roadmap*, at 3 (Dec. 2023), https://cdn.misoenergy.org/2023%20Attributes%20Roadmap%20Executive%20Summary631175.pdf.

[17] *Id.* at 11.

and spring seasons will nevertheless increase over time, although not as high as in the summer or fall.[18]

More recently, MISO affirmed the resource adequacy problems occurring outside of its summer season in its 2024 report entitled, "*MISO's Response to the Reliability Imperative.*"[19] In a section of that report entitled, "Risks in Non-Summer Seasons," MISO again stressed that it has resource reliability concerns outside of the summer season:

> Widespread retirements of dispatchable resources, lower reserve margins, more frequent and severe weather events and increased reliance on weather-dependent renewables and emergency-only resources have altered the region's historic risk profile, creating risks in non-summer months that rarely posed challenges in the past.[20]

These MISO studies indicate that the emergency conditions caused by the loss of generation capacity in MISO extend past the summer season.

In January 2026, NERC released its 2025 Long-Term Reliability Assessment (2025 LTRA).[21] NERC assessed that the MISO region is at high risk of energy shortfalls over the next five years,[22] stating that it faces significant reliability challenges as "projected resource additions do not keep pace with escalating demand forecasts and announced generator retirements."[23] This determination is based on the combination of accelerating demand growth from new data centers and the retirement of existing thermal generators.[24] The 2025 LTRA notes that "MISO's accredited thermal capacity has decreased by 8.8 GW, driven primarily by reductions in accredited capacity of existing facilities and retirements."[25] NERC observes that winter peak periods are a particular concern, with projections showing "shortfalls in planned resources for winter peak periods."[26] However, NERC also concluded that "risks could expand into spring and fall generator maintenance periods when the available dispatchable generation is not enough to counter wind and solar variability when demand is high."[27]

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[18] *Id*.

[19] MISO, *MISO's Response to the Reliability Imperative* (updated Feb. 2024), https://cdn.misoenergy.org/2024+Reliability+Imperative+report+Feb.+21+Final504018.pdf.

[20] *Id.* at 12.

[21] NERC, *2025 Long-Term Reliability Assessment* (Jan. 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf.

[22] *Id.* at 6, 8.

[23] *Id.* at 8.

[24] *Id.* at 43.

[25] *Id.* at 15.

[26] *Id*.

[27] *Id.*

The 2025–2026 NERC Winter Reliability Assessment found the MISO region to be at normal risk in 2026 and elevated risk in 2027. The two previous winter studies respectively characterized MISO as a region at elevated risk with the "[p]otential for insufficient operating reserves in above-normal conditions"[28] and noted that "[g]enerating capacity is 10 GW lower (-6.8%) compared to the prior winter as generators have retired, withdrawn from MISO's capacity market, or received lower winter accredited capacity."[29]

NERC released its 2026 Summer Reliability Assessment (SRA) on May 19, 2026. In its assessment, NERC stated that "MISO's peak load has increased by 2.5 GW from the 2025 SRA."[30] The 2026 SRA also projects that data center load will continue to accelerate in 2027 and beyond, potentially increasing reliability risk if capacity additions do not keep pace.[31] Furthermore, the 2026 SRA states that "[a]bove-normal summer peak load combined with low resource conditions could result in the need to employ operating mitigations (e.g., load-modifying resources) and EEAs [Energy Emergency Alerts]."[32] Since the region benefits from transmission connections with neighbors to meet extreme conditions, MISO's reliance on electricity imports will increase when extreme conditions arise."[33]

The evidence indicates that there is also a potential longer-term resource adequacy emergency in MISO. When MISO reported the results of its PRA for the 2025–26 Planning Year, it noted that "new capacity additions were insufficient to offset the negative impacts of decreased accreditation, suspensions/retirements and external resources" in the northern and central zones, which include Indiana.[34]

There continues to be tight capacity available during summer despite the recent "gains in offered capacity outpacing pressure of load growth" in the MISO region, as reported in its PRA for the 2026-2027 Planning Year.[35] MISO noted that "new generation

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[28] NERC, *2023–2024 Winter Reliability Assessment*, at 5 (Nov. 2023), https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2023.pdf.

[29] NERC, *2024–2025 Winter Reliability Assessment*, at 15 (Nov. 2024), https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2024.pdf.

[30] NERC, *2026 Summer Reliability Assessment*, at 16 (May 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_sra_2026.pdf.

[31] *Id.*

[32] *Id.*

[33] *Id*.

[34] MISO, *Planning Res. Auction: Results for Planning Year 2025–26*, at 13 (Apr. 2025), https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf.

[35] MISO, *Planning Res. Auction Results for Planning Year 2026/27*, at 3 (Apr. 2026, updated May 22, 2026), https://cdn.misoenergy.org/2026%20PRA%20Results%20Posting%2020260522%20-%20Corrections754715.pdf.

capacity is coming online, but faster resource additions are still needed to support large-load growth and ensure resource adequacy."

On June 4, 2026, the Organization of MISO States (OMS) and MISO issued the results of their 2026 survey, which has been conducted annually for many years to determine the degree to which expected capacity resources satisfy planning reserve margin requirements.[36] The 2026 OMS-MISO Survey presented projections of resource adequacy for the summer of 2026 and subsequent years and states "growth as submitted by [load serving entities or LSEs] continues to accelerate, with a [compound annual growth rate or CAGR] projected between 3.1% and 5.1% over [the next] five years."[37]

The OMS-MISO Survey further indicates that "[v]arious projected capacity scenarios and large load additions highlight increasing uncertainty and evolving risk"[38] and observes various negative risks. Examples include intensification of winter reliability risks based on resource availability/performance, which exacerbates seasonal reliability vulnerabilities; delay of new resource deployment owing to persistent supply-chain disruptions, labor constraints and permitting challenges; resource adequacy pressures continuing from load growth driven by data centers, new industrial, and commercial development; and continued backlog and uncertainty related to resources with signed Generator Interconnection Agreements (GIA).[39] In addition, 87 GW of signed GIAs are not yet online, and 192 GW of active GIAs still under study.[40]

Finally, the OMS-MISO Survey lists ongoing challenges such as more frequent extreme weather; accelerating demand for electricity and large load interconnections; loss of accredited capacity and reliability attributes as resource mixes evolve; the increasing pace of new resources additions; addressing local reliability issues (load pocket); and evolving storage participation.[41]

NERC released its 2026 State of Reliability (SOR) on June 24, 2026. In the SOR, NERC identifies worsening reliability concerns tied to large-load integration and localized operating stress. In its technical discussion of major system events, NERC states "shoulder seasons have become increasingly challenging for Bulk Power System operators to manage, resulting in several recent instances of pre-contingent load shedding."[42] The SOR also finds large load growth is increasing reliability risk and states

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[36] OMS & MISO, *OMS-MISO Survey Results* (updated June 4, 2026) (2026 OMS-MISO Survey), https://cdn.misoenergy.org/20260604%20OMS-MISO%20Survey%20Results%20Workshop%20Presentation761711.pdf.

[37] *Id.* at 2.

[38] *Id.* at 3.

[39] *Id.* at 4.

[40] *Id.*

[41] *Id.* at 16.

[42] NERC, *2026 State of Reliability: Tech. Assessment of 2025 Bulk Power Sys. Performance*, at 5 (June 24, 2026), https://www.nerc.com/globalassets/programs/rapa/pa/nerc_sor_2026_technical_assessment.pdf.

that "data center and computational loads continued emerging as a major reliability consideration due to their scale, speed of development, and unique operational characteristics."[43] Finally, data in the SOR shows that 2025 MISO summer and winter peak demands of 121.6 GW and 108.8 GW, respectively, met or exceeded extreme scenario levels showing how rapid load growth and extreme weather continue to be a real risk in MISO.[44]

MISO has been taking steps to address these projected deficits. For example, on June 6, 2025, MISO submitted a proposal to FERC to establish an Expedited Resource Addition Study (ERAS) process to provide a framework for the expedited study of interconnection requests to address urgent resource adequacy and reliability needs in the near term. This proposal was approved by FERC on July 21, 2025.[45] MISO's ERAS should help expedite the construction of needed new capacity; however, resources studied under the ERAS will have commercial operation dates that are at least three years away and are provided an additional three-year grace period to commence commercial operations.[46] In addition, supply chain constraints impeding the acquisition of critical grid components, including large natural gas turbines and transformers, are likely to further hinder rapid construction and exacerbate reliability concerns.[47] Consequently, the new ERAS process is unlikely to result in the addition of any new generation capacity in the next few years.

Order Nos. 202-25-12, 202-26-19, and 202-26-29 were preceded by executive orders on January 20, 2025, and April 8, 2025, in which President Donald J. Trump underscored the dire energy challenges facing the Nation due to growing resource adequacy concerns. President Trump declared a national energy emergency in Executive Order No. 14156, "Declaring a National Energy Emergency," in which he determined that the "United States' insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to our Nation's economy, national security, and foreign policy."[48] The Executive Order adds that "hostile state and non-state foreign actors have targeted our domestic energy infrastructure, weaponized our

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[43] *Id.* at vii.

[44] *Id.* at 28, 30.

[45] *Midcontinent Indep. Sys. Operator, Inc.*, 192 FERC ¶ 61,064 (2025).

[46] NERC, *State of Reliability*, *supra* note 48, at 84.

[47] *See generally* Jared Anderson, *US Gas-Fired Turbine Wait Times as Much as Seven Years; Costs Up Sharply*, S&P GLOBAL (May 2025) ("With demand for natural gas-fired turbines in the US rapidly accelerating amid power demand growth forecasts driven by AI, manufacturing, and electrification, wait times for turbines are anywhere between one and seven years depending on the model, and costs have increased considerably, experts told Platts."), https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply.

[48] Exec. Order No. 14156, 90 Fed. Reg. 8433 (Jan. 20, 2025), https://www.federalregister.gov/documents/2025/01/29/2025-02003/declaring-a-national-energy-emergency.

reliance on foreign energy, and abused their ability to cause dramatic swings within international commodity markets."[49] In the subsequent Executive Order No. 14262, "Strengthening the Reliability and Security of the United States Electric Grid," President Trump emphasized that "the United States is experiencing an unprecedented surge in electricity demand driven by rapid technological advancements, including the expansion of artificial intelligence data centers and increase in domestic manufacturing."[50]

In addition, President Trump issued a White House Memo for the Secretary that emphasized the findings of Executive Order No. 14156, stating that "ensuring reliable coal supply chains and baseload power generation capacity is essential to the United States national defense . . . . Without sufficient coal-fired baseload power, the United States will lack the stable electricity required to support defense installations, industrial expansion, and the high-energy demands of emerging technologies, such as artificial intelligence."[51] The President "further determine[d] that action to expand coal supply chain capacity and baseload generation availability is necessary to avert an industrial resource or critical technology item shortfall that would severely impair national defense capability."[52]

Further, the Department detailed the myriad challenges affecting the Nation's energy systems in its July 2025 "Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid," which was issued pursuant to the President's directive in Executive Order No. 14262. The Department concluded that "[a]bsent decisive intervention, the Nation's power grid will be unable to meet projected demand for manufacturing, re-industrialization, and data centers driving artificial intelligence (AI) innovation."[53] The prolific growth of data centers for the development of AI, as well as their immense energy needs, presents a new and unexpected source of load growth. This growth is illustrated by NiSource's announcement of executed long-

[49] *Id*.

[50] Exec. Order No. 14262, 90 Fed. Reg. 15521 (Apr. 8, 2025), https://www.federalregister.gov/documents/2025/04/14/2025-06381/strengthening-the-reliability-and-security-of-the-united-states-electric-grid.

[51] Memorandum from President Donald J. Trump to the Secretary of Energy (Apr. 20, 2026) (*Presidential Determination Pursuant to Sec. 303 of the Def. Prod. Act of 1950, as Amended, on Coal Supply Chains & Baseload Power Generation Capacity*), https://www.whitehouse.gov/presidential-actions/2026/04/presidential-determination-pursuant-to-section-303-of-the-defense-production-act-of-1950-as-amended-on-coal-supply-chains-and-baseload-power-generation-capacity/.

[52] *Id.*

[53] DOE, *Res. Adequacy Rep.: Evaluating the Reliability & Sec. of the U.S. Elec. Grid*, at 1 (July 2025), https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%29.pdf.

term agreements[54] to deliver energy solutions and energy capacity for approximately 4 GW of large-scale data centers in Northern Indiana.[55]

Grid operators—including MISO itself—have also acknowledged the Nation's current energy crisis. For instance, during a March 25, 2025, hearing before the House Committee on Energy and Commerce, MISO's Senior Vice President for Planning and Operations, Jennifer Curran, testified that "the MISO region faces resource adequacy and reliability challenges due to the changing characteristics of the electric generating fleet, inadequate transmission system infrastructure, growing pressures from extreme weather, and rapid load growth."[56]Ms. Curran also described "much stronger growth [in demand for electricity] from continued electrification efforts, a resurgence in manufacturing, and an unexpected demand for energy-hungry data centers to support artificial intelligence."[57] She added that "[a] growing reliability risk is that the rapid retirement of existing coal and gas power plants threatens to outpace the ability of new resources with the necessary operational characteristics to replace them."[58]

Pursuant to section 202(c)(4)(B) of the FPA, DOE has consulted with the primary Federal agency with expertise in the environmental interest protected by the laws or regulations that may conflict with this Order. The agency did not submit additional conditions for inclusion in this Order.

ORDER

FPA section 202(c)(1) provides that whenever the Secretary determines "that an emergency exists by reason of a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy," the Secretary has the authority "to require by order . . . such generation, delivery, interchange, or transmission of electric energy as in [his] judgment will best meet the

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[54] *NiSource announces strategic energy infrastructure agreements to enhance customer value and economic growth in Indiana,* NIPSCO (Apr. 16, 2026), https://www.nipsco.com/our-company/news-room/news-article/nisource-announces-strategic-energy-infrastructure-agreements-to-enhance-customer-value-and-economic-growth-in-indiana.

[55] NiSource Inc., *Supplemental Slides 1Q 2026 Results,* (May 6, 2026), https://s1.q4cdn.com/829981032/files/doc_earnings/2026/q1/supplemental-info/NiSource-1Q_2026-Earnings-Slides-FINAL.pdf.

[56] *Keeping the Lights On: Examining the State of Reg'l Grid Reliability; Hearing Before the House Comm. on Energy & Commerce*, *Subcommittee on Energy,* 119th Cong. 5 (2025) (statement of Ms. Jennifer Curran, Senior Vice President for Planning and Operations, MISO), https://www.congress.gov/119/meeting/house/118040/witnesses/HHRG-119-IF03-Wstate-CurranJ-20250325.pdf.

[57] *Id.* at 6.

[58] *Id.* at 7.

emergency and serve the public interest."[59] This statutory language constitutes a specific grant of authority to the Secretary to require the continued operation of Schahfer Units 17 and 18 when the Secretary has determined that such operation will best meet an emergency.

As described above, the emergency conditions resulting from increasing demand and shortage of electric energy from premature retirement of generation facilities will continue in the near term and are also likely to continue in subsequent years. This could lead to the loss of power to homes and businesses in the areas that may be affected by curtailments or power outages, presenting a risk to public health and safety.

I have determined that, to best meet the emergency arising from increased demand, determined shortage, and other causes, and serve the public interest under FPA section 202(c), Schahfer Units 17 and 18 shall be made available for operation through December 18, 2026.[60]

[59] Although the text of FPA section 202(c) grants this authority to "the Commission," section 301(b) of the Department of Energy Organization Act transferred this authority to the Secretary of the Department of Energy. *See* 42 U.S.C. § 7151(b).

[60] 16 U.S.C. § 824a(c)(4).

Based on my determination of an emergency set forth above, I hereby order:

A. From September 20, 2026, NIPSCO and MISO shall take all measures necessary to ensure that Schahfer Units 17 and 18 are available to operate. For the duration of this Order, MISO is directed to take every step to employ economic dispatch of Schahfer Units 17 and 18 to minimize cost to ratepayers. Following the conclusion of this Order, sufficient time for orderly ramp down is permitted, consistent with industry practices. NIPSCO is directed to comply with all orders from MISO related to the availability and dispatch of Schahfer Units 17 and 18.

B. To minimize adverse environmental impacts, this Order limits operation of Schahfer Units 17 and 18 to the times and within the parameters as determined by MISO, pursuant to paragraph A. MISO shall provide a daily notification to the Department (via AskCR@hq.doe.gov) reporting whether Schahfer Units 17 and 18 have operated in compliance with this Order.

C. All operations of Schahfer Units 17 and 18 must comply with applicable environmental requirements, including but not limited to monitoring, reporting, and recordkeeping requirements, to the maximum extent feasible while operating consistent with the emergency conditions. This Order does not provide relief from any obligation to pay fees or purchase offsets or allowances for emissions that occur during the emergency conditions or to use other geographic or temporal flexibilities available to generators.

D. By October 3, 2026, MISO is directed to provide the Department (via AskCR@hq.doe.gov) with information concerning the measures it has taken and is planning to take to ensure the operational availability of Schahfer Units 17 and 18 consistent with this Order. NIPSCO and MISO shall also provide such additional information regarding the environmental impacts of this Order and its compliance with the conditions of this Order, in each case as requested by the Department from time to time.

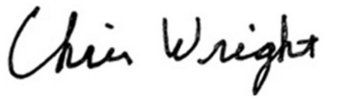
E. NIPSCO is directed to file with FERC tariff revisions or waivers to effectuate this Order, as needed. Rate recovery is available pursuant to 16 U.S.C. § 824a(c).

F. This Order shall not preclude the need for Schahfer Units 17 and 18 to comply with applicable state, local, or Federal law or regulations following the expiration of this Order.

G. Because this Order is predicated on the shortage of facilities for generation of electric energy and other causes, Schahfer Units 17 and 18 shall not be considered capacity resources.

H. This Order shall be effective from September 20, 2026, through December 18, 2026, with the exception of applicable compliance obligations in paragraph D.

Issued in Washington, D.C. on this 18th Day of September 2026.



Chris Wright
Secretary of Energy

cc: **Federal Energy Regulatory Commission**
Chairman Laura V. Swett
Commissioner David Rosner
Commissioner Lindsay S. See
Commissioner Judy W. Chang
Commissioner David A. LaCerte

Indiana Utility Regulatory Commission
Chairman Anthony Swinger
Commissioner Joshua Bain
Commissioner Bob Deig
Commissioner Joby Jerrells
Commissioner David Ziegner

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 204
September Culley Order

Department of Energy
Washington, DC 20585

CenterPoint Energy and
Midcontinent Independent System Operator, Inc.
Regarding F.B. Culley Generating Station

Order No. 202-26-47

Pursuant to the authority vested in the Secretary of Energy (Secretary) by section 202(c) of the Federal Power Act (FPA),[1] and section 301(b) of the Department of Energy (DOE or the Department) Organization Act,[2] and for the reasons set forth below, I hereby determine that an emergency exists in portions of the Midcontinent Independent System Operator (MISO) region due to a sudden increase in demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy, and other causes. Issuance of this Order will meet the emergency and serve the public interest.

BACKGROUND

The F.B. Culley Generating Station (Culley) is an electric generating facility in Warrick County, Indiana. Culley is owned and operated by CenterPoint Energy and consists of two coal-fired electric generating units, Unit 2 (103.7 MW) and Unit 3 (265.2 MW), with a combined nameplate capacity of 368.9 MW.[3] Unit 2 and Unit 3 began operations in 1966 and 1973, respectively. Unit 2 was slated to cease operations in December 2025.[4]

Order Nos. 202-25-13, 202-26-20, and 202-26-30, issued pursuant to FPA section 202(c), required that Culley Unit 2 remain in operation for 90 days, until March 23, 2026, June 21, 2026, and September 19, 2026, respectively. Those orders

[1] 16 U.S.C. § 824a(c).

[2] 42 U.S.C. § 7151(b).

[3] U.S. Energy Info. Admin., *Form EIA-860 detailed data with previous form data (EIA-860A/860B)*, https://www.eia.gov/electricity/data/eia860/ (click "2025 (early release)").

[4] It likely would be difficult for the coal-fired units to resume operations once retired. Specifically, practical issues, such as employment, contracts, and permits, may greatly increase the timeline for resumption of operations during the period they are needed. Moreover, if CenterPoint Energy were to begin disassembling the units or other related facilities, the associated challenges would be greatly exacerbated. The costs and time of decommissioning a coal plant are extensive, and restarting such decommissioned plants would presumably cost the same as decommissioning in dollars and time, if not more. Thus, continuous operation is required in such cases so long as the Secretary determines a shortage exists and is likely to persist. *See* Jennifer Lessick et al., *Bus. Models for Coal Plant Decommissioning*, at 9–12 (DOE, Pac. Nw. Nat'l Lab'y, Report, Aug. 2021), https://www.pnnl.gov/main/publications/external/technical_reports/PNNL-31348.pdf.

were based on my determination that emergency conditions existed in the region served by MISO.

Specifically, I determined that MISO faced tight reserve margins due to well-documented year-round resource adequacy concerns, particularly during periods of high demand or low generation resource output.[5] I determined that the continued operation of Culley Unit 2 would provide additional generation capacity during these periods, which would help prevent the loss of power to homes and businesses in the areas that might have been affected by curtailments or outages that would otherwise pose a risk to public health and safety.[6] I determined that the continued operation of Culley Unit 2 was necessary to alleviate immediate and anticipated threats to reliability.[7]

My determination was based on several facts. First, in its 2024 Long-Term Reliability Assessment (2024 LTRA), the North American Electric Reliability Corporation (NERC) notes that the MISO assessment area, which covers portions of Arkansas, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, Montana, North Dakota, South Dakota, Texas, and Wisconsin, is at an elevated risk, "because probabilistic assessments indicate above-normal generator outages during extreme weather can result in unserved energy or load loss. With uncertainty around new resource additions and existing generator retirements, MISO is also at risk of falling below [Reference Margin Levels] within the next five years."[8] Additionally, the 2024 LTRA notes that "[t]he departure of MISO's coal fleet has continued with a reduction in capacity of around 6 GW in the past year, and a projected reduction of a further 12 GW over the next five years."[9]

CONTINUING EMERGENCY CONDITIONS

The emergency conditions that necessitated the issuance of Order Nos. 202-25-13, 202-26-20, and 202-26-30 continue, both in the near and long term. The production of electricity from Culley Unit 2 continues to be a critical asset to maintain reliability in MISO. MISO's resource adequacy concerns were recently demonstrated during Winter Storm Fern, when Culley operated under a cold weather alert and declared conservative operations from January 23 through February 1, 2026. On January 24, MISO declared an Energy Emergency Alert (EEA) 1, as well as an EEA 2 "MaxGen" event for MISO's North and Central Regions due to generation outages, high demand, and transfer

[5] *See, e.g.*, *Midcontinent Indep. Sys. Operator, Inc*, DOE Order No. 202-26-30, at 2–5 (June 18, 2026).

[6] *See, e.g.*, *id.*

[7] *See, e.g.*, *id.* at 5.

[8] N. Am. Elec Reliability Corp., *2024 Long-Term Reliability Assessment*, at 13 (Dec. 2024, corrected July 11, 2025), https://www.nerc.com/globalassets/our-work/assessments/2024-ltra_corrected_july_2025.pdf.

[9] *Id.* at 44.

capability limits.[10] From January 21–February 1, 2026, Culley operated at roughly 30 MW almost every day.[11] According to the EIA-923 Power Plant Operations Report's monthly generation data for June 2026, the total net generation for the Culley Unit 2was 48,923 MWh from January 2026 to June 2026 for an average of 8,154 MWh per month.[12] This generation data indicates that Culley Unit 2 is providing vital generation capacity to the region.

MISO's year-round resource adequacy concerns are well-documented. MISO requested that the Federal Energy Regulatory Commission (FERC) approve its filing to revise its resource adequacy construct (including the Planning Resource Auction or PRA) to establish capacity requirements for each of the four seasons of the year rather than on an annual basis determined by peak summer demand.[13] MISO justified this revision by explaining that "[r]eliability risks associated with [r]esource [a]dequacy have shifted from 'Summer only' to a year-round concern."[14] MISO noted that over 60% of all "MaxGen" events (events when MISO initiates emergency procedures because of concerns over the adequacy of available generation) occurred outside of the summer season.[15]

In December 2023, MISO released an "Attributes Roadmap," in which it presented "an in-depth look at the challenges of operating a reliable bulk electric system in a rapidly transforming energy landscape."[16] Among other things, this report described changes in the time of year during which the risk of the loss of load was greatest. For the 2023–2024 Planning Year, the greatest risk of loss of load was in the summer, but it is expected that by the summer of 2027, there will be an equal loss of load risk in both the summer and fall seasons.[17] MISO also projected that the risk of loss of load in the winter

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[10] MISO, *Operations Rep.*, at 10 (Mar. 24, 2026), https://cdn.misoenergy.org/20260324%20Markets%20Committee%20of%20the%20BOD%20Item%2008%20MISO%20Operations%20Report746763.pdf.

[11] DOE, *FACT SHEET: Energy Dep't Prevented Blackouts & Saved Am. Lives During Winter Storms* (Feb. 6, 2026), https://www.energy.gov/articles/fact-sheet-energy-department-prevented-blackouts-saved-american-lives-during-winter-storms.

[12] *See* U.S. Energy Info. Admin., *Form EIA-923 detailed data with previous form data (EIA-906/920)*, https://www.eia.gov/electricity/data/eia923/ (choose "2026: EIA-923 June 2026").

[13] *Midcontinent Indep. Sys. Operator, Inc.*, Transmittal Letter, FERC Dkt. No. ER22-495-000 (filed Nov. 30, 2021). FERC accepted MISO's proposed tariff revisions on August 31, 2022. *See also Midcontinent Indep. Sys. Operator, Inc.*, 180 FERC ¶ 61,141 (2022), *order on reh'g & compliance*, 182 FERC ¶ 61,096 (2023).

[14] *MISO*, Transmittal Letter, FERC Dkt No. ER22-495-000, at 3.

[15] *Id.* at 3–4.

[16] MISO, *Attributes Roadmap*, at 3 (Dec. 2023), https://cdn.misoenergy.org/2023%20Attributes%20Roadmap%20Executive%20Summary631175.pdf.

[17] *Id.* at 11.

and spring seasons will nevertheless increase over time, although not as high as in the summer or fall.[18]

More recently, MISO affirmed the resource adequacy problems occurring outside of its summer season in its 2024 report entitled, "*MISO's Response to the Reliability Imperative.*"[19] In a section of that report entitled, "*Risks in Non-Summer Seasons*," MISO again stressed that it has resource reliability concerns outside of the summer season:

> Widespread retirements of dispatchable resources, lower reserve margins, more frequent and severe weather events and increased reliance on weather-dependent renewables and emergency-only resources have altered the region's historic risk profile, creating risks in non-summer months that rarely posed challenges in the past.[20]

These MISO studies indicate that the emergency conditions caused by the loss of generation capacity in MISO extend past the summer season.

In January 2026, NERC released its 2025 Long-Term Reliability Assessment (2025 LTRA).[21] NERC assessed that the MISO region is at high risk of energy shortfalls over the next five years,[22] stating that it faces significant reliability challenges as "projected resource additions do not keep pace with escalating demand forecasts and announced generator retirements."[23] This determination is based on the combination of accelerating demand growth from new data centers and the retirement of existing thermal generators.[24] The 2025 LTRA notes that "MISO's accredited thermal capacity has decreased by 8.8 GW, driven primarily by reductions in accredited capacity of existing facilities and retirements."[25] NERC observes that winter peak periods are a particular concern, with projections showing "shortfalls in planned resources for winter peak periods."[26] However, NERC also concluded that "risks could expand into spring and fall generator maintenance periods when the available dispatchable generation is not enough to counter wind and solar variability when demand is high."[27]

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[18] *Id*.

[19] MISO, *MISO's Response to the Reliability Imperative* (updated Feb. 2024), https://cdn.misoenergy.org/2024+Reliability+Imperative+report+Feb.+21+Final504018.pdf.

[20] *Id.* at 12.

[21] NERC, *2025 Long-Term Reliability Assessment* (Jan. 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf.

[22] *Id.* at 6, 8.

[23] *Id.* at 8.

[24] *Id.* at 43.

[25] *Id.* at 15.

[26] *Id*.

[27] *Id.*

The 2025–2026 NERC Winter Reliability Assessment found the MISO region to be at normal risk in 2026 and elevated risk in 2027. The two previous winter studies respectively characterized MISO as a region at elevated risk with the "[p]otential for insufficient operating reserves in above-normal conditions"[28] and noted that "[g]enerating capacity is 10 GW lower (-6.8%) compared to the prior winter as generators have retired, withdrawn from MISO's capacity market, or received lower winter accredited capacity."[29]

NERC released its 2026 Summer Reliability Assessment (SRA) on May 19, 2026. In its assessment, NERC stated that "MISO's peak load has increased by 2.5 GW from the 2025 SRA."[30] The 2026 SRA also projects that data center load will continue to accelerate in 2027 and beyond, potentially increasing reliability risk if capacity additions do not keep pace.[31] Furthermore, the 2026 SRA states that "[a]bove-normal summer peak load combined with low resource conditions could result in the need to employ operating mitigations (e.g., load-modifying resources) and EEAs [Energy Emergency Alerts]."[32] Since the region benefits from transmission connections with neighbors to meet extreme conditions, MISO's reliance on electricity imports will increase when extreme conditions arise."[33]

The evidence indicates that there is also a potential longer-term resource adequacy emergency in MISO. When MISO reported the results of its PRA for the 2025–26 Planning Year, it noted that "new capacity additions were insufficient to offset the negative impacts of decreased accreditation, suspensions/retirements and external resources" in the northern and central zones, which include Indiana.[34]

There continues to be tight capacity available during summer despite the recent "gains in offered capacity outpacing pressure of load growth" in the MISO region, as reported in its PRA for the 2026-2027 Planning Year.[35] MISO noted that "new generation

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[28] NERC, *2023–2024 Winter Reliability Assessment*, at 5 (Nov. 2023), https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2023.pdf.

[29] NERC, *2024–2025 Winter Reliability Assessment*, at 15 (Nov. 2024), https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2024.pdf.

[30] NERC, *2026 Summer Reliability Assessment*, at 16 (May 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_sra_2026.pdf.

[31] *Id.*

[32] *Id.*

[33] *Id*.

[34] MISO, *Planning Res. Auction: Results for Planning Year 2025–26*, at 13 (Apr. 2025), https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf.

[35] MISO, *Planning Res. Auction Results for Planning Year 2026/27*, at 3 (Apr. 2026, updated May 22, 2026), https://cdn.misoenergy.org/2026%20PRA%20Results%20Posting%2020260522%20-%20Corrections754715.pdf.

capacity is coming online, but faster resource additions are still needed to support large-load growth and ensure resource adequacy."

On June 4, 2026, the Organization of MISO States (OMS) and MISO issued the results of their 2026 survey, which has been conducted annually for many years to determine the degree to which expected capacity resources satisfy planning reserve margin requirements.[36] The 2026 OMS-MISO Survey presented projections of resource adequacy for the summer of 2026 and subsequent years and states "growth as submitted by [load serving entities or LSEs] continues to accelerate, with a [compound annual growth rate or CAGR] projected between 3.1% and 5.1% over [the next] five years."[37]

The OMS-MISO Survey further indicates that "[v]arious projected capacity scenarios and large load additions highlight increasing uncertainty and evolving risk"[38] and observes various negative risks. Examples include intensification of winter reliability risks based on resource availability/performance, which exacerbates seasonal reliability vulnerabilities; delay of new resource deployment owing to persistent supply-chain disruptions, labor constraints and permitting challenges; resource adequacy pressures continuing from load growth driven by data centers, new industrial, and commercial development; and continued backlog and uncertainty related to resources with signed Generator Interconnection Agreements (GIA).[39] In addition, 87 GW of signed GIAs are not yet online, and 192 GW of active GIAs still under study.[40]

Finally, the OMS-MISO Survey lists ongoing challenges such as more frequent extreme weather; accelerating demand for electricity and large load interconnections; loss of accredited capacity and reliability attributes as resource mixes evolve; the increasing pace of new resources additions; addressing local reliability issues (load pocket); and evolving storage participation.[41]

NERC released its 2026 State of Reliability (SOR) on June 24, 2026. In the SOR, NERC identifies worsening reliability concerns tied to large-load integration and localized operating stress. In its technical discussion of major system events, NERC states "shoulder seasons have become increasingly challenging for Bulk Power System operators to manage, resulting in several recent instances of pre-contingent load shedding."[42] The SOR also finds large load growth is increasing reliability risk and

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[36] OMS & MISO, *OMS-MISO Survey Results* (updated June 4, 2026) (2026 OMS-MISO Survey), https://cdn.misoenergy.org/20260604%20OMS-MISO%20Survey%20Results%20Workshop%20Presentation761711.pdf.

[37] *Id.* at 2.

[38] *Id.* at 3.

[39] *Id.* at 4.

[40] *Id.*

[41] *Id.* at 16.

[42] NERC, *2026 State of Reliability: Tech. Assessment of 2025 Bulk Power Sys. Performance*, at 5 (June 24, 2026), https://www.nerc.com/globalassets/programs/rapa/pa/nerc_sor_2026_technical_assessment.pdf.

states that "data center and computational loads continued emerging as a major reliability consideration due to their scale, speed of development, and unique operational characteristics."[43] Finally, data in the SOR shows that 2025 MISO summer and winter peak demands of 121.6 GW and 108.8 GW, respectively, met or exceeded extreme scenario levels showing how rapid load growth and extreme weather continue to be a real risk in MISO.[44]

MISO has been taking steps to address these projected deficits. For example, on June 6, 2025, MISO submitted a proposal to FERC to establish an Expedited Resource Addition Study (ERAS) process to provide a framework for the expedited study of interconnection requests to address urgent resource adequacy and reliability needs in the near term. This proposal was approved by FERC on July 21, 2025.[45] MISO's ERAS should help expedite the construction of needed new capacity; however, resources studied under the ERAS will have commercial operation dates that are at least three years away and are provided an additional three-year grace period to commence commercial operations.[46] In addition, supply chain constraints impeding the acquisition of critical grid components, including large natural gas turbines and transformers, are likely to further hinder rapid construction and exacerbate reliability concerns.[47] Consequently, the new ERAS process is unlikely to result in the addition of any new generation capacity in the next few years

Order Nos. 202-25-13, 202-26-20, and 202-26-30 were preceded by executive orders on January 20, 2025, and April 8, 2025, in which President Donald J. Trump underscored the dire energy challenges facing the Nation due to growing resource adequacy concerns. President Trump declared a national energy emergency in Executive Order No. 14156, "Declaring a National Energy Emergency," in which he determined that the "United States' insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to our Nation's economy, national security, and foreign policy."[48] The Executive Order adds that "hostile state and non-state foreign actors have targeted our domestic energy infrastructure, weaponized our reliance on foreign energy, and abused their ability to cause dramatic

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[43] *Id.* at vii.

[44] *Id.* at 28, 30.

[45] *Midcontinent Indep. Sys. Operator, Inc.*, 192 FERC ¶ 61,064 (2025).

[46] NERC, *State of Reliability*, *supra* note 48, at 84.

[47] *See generally* Jared Anderson, *US Gas-Fired Turbine Wait Times as Much as Seven Years; Costs Up Sharply*, S&P GLOBAL (May 2025) ("With demand for natural gas-fired turbines in the US rapidly accelerating amid power demand growth forecasts driven by AI, manufacturing, and electrification, wait times for turbines are anywhere between one and seven years depending on the model, and costs have increased considerably, experts told Platts."), https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply.

[48] Exec. Order No. 14156, 90 Fed. Reg. 8433 (Jan. 20, 2025), https://www.federalregister.gov/documents/2025/01/29/2025-02003/declaring-a-national-energy-emergency.

swings within international commodity markets."[49] In the subsequent Executive Order No. 14262, "Strengthening the Reliability and Security of the United States Electric Grid," President Trump emphasized that "the United States is experiencing an unprecedented surge in electricity demand driven by rapid technological advancements, including the expansion of artificial intelligence data centers and increase in domestic manufacturing."[50]

In addition, President Trump issued a White House Memo for the Secretary that emphasized the findings of Executive Order No. 14156, stating that "ensuring reliable coal supply chains and baseload power generation capacity is essential to the United States national defense . . . . Without sufficient coal-fired baseload power, the United States will lack the stable electricity required to support defense installations, industrial expansion, and the high-energy demands of emerging technologies, such as artificial intelligence."[51] The President "further determine[d] that action to expand coal supply chain capacity and baseload generation availability is necessary to avert an industrial resource or critical technology item shortfall that would severely impair national defense capability."[52]

Further, the Department detailed the myriad challenges affecting the Nation's energy systems in its July 2025 "Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid," which was issued pursuant to the President's directive in Executive Order No. 14262. The Department concluded that "[a]bsent decisive intervention, the Nation's power grid will be unable to meet projected demand for manufacturing, re-industrialization, and data centers driving artificial intelligence (AI) innovation."[53]

Grid operators—including MISO itself—have also acknowledged the Nation's current energy crisis. For instance, during a March 25, 2025, hearing before the House Committee on Energy and Commerce, MISO's Senior Vice President for Planning and Operations, Jennifer Curran, testified that "the MISO region faces resource adequacy and reliability challenges due to the changing characteristics of the electric generating fleet,

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[49] *Id*.

[50] Exec. Order No. 14262, 90 Fed. Reg. 15521 (Apr. 8, 2025), https://www.federalregister.gov/documents/2025/04/14/2025-06381/strengthening-the-reliability-and-security-of-the-united-states-electric-grid.

[51] Memorandum from President Donald J. Trump to the Secretary of Energy (Apr. 20, 2026) (*Presidential Determination Pursuant to Sec. 303 of the Def. Prod. Act of 1950, as Amended, on Coal Supply Chains & Baseload Power Generation Capacity*), https://www.whitehouse.gov/presidential-actions/2026/04/presidential-determination-pursuant-to-section-303-of-the-defense-production-act-of-1950-as-amended-on-coal-supply-chains-and-baseload-power-generation-capacity/.

[52] *Id.*

[53] DOE, *Res. Adequacy Rep.: Evaluating the Reliability & Sec. of the U.S. Elec. Grid*, at 1 (July 2025), https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%29.pdf.

inadequate transmission system infrastructure, growing pressures from extreme weather, and rapid load growth."[54] Ms. Curran also described "much stronger growth [in demand for electricity] from continued electrification efforts, a resurgence in manufacturing, and an unexpected demand for energy-hungry data centers to support artificial intelligence."[55] She added that "[a] growing reliability risk is that the rapid retirement of existing coal and gas power plants threatens to outpace the ability of new resources with the necessary operational characteristics to replace them."[56]

Pursuant to section 202(c)(4)(B) of the FPA, DOE has consulted with the primary Federal agency with expertise in the environmental interest protected by the laws or regulations that may conflict with this Order. The agency did not submit additional conditions for inclusion in this Order.

ORDER

FPA section 202(c)(1) provides that whenever the Secretary determines "that an emergency exists by reason of a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy," the Secretary has the authority "to require by order . . . such generation, delivery, interchange, or transmission of electric energy as in [his] judgment will best meet the emergency and serve the public interest."[57] This statutory language constitutes a specific grant of authority to the Secretary to require the continued operation of Culley Unit 2 when the Secretary has determined that such operation will best meet an emergency.

As described above, the emergency conditions resulting from increasing demand and shortage of electric energy from premature retirement of generation facilities will continue in the near term and are also likely to continue in subsequent years. This could lead to the loss of power to homes and businesses in the areas that may be affected by curtailments or power outages, presenting a risk to public health and safety.

I have determined that, to best meet the emergency arising from increased demand, determined shortage, and other causes, and serve the public interest under FPA

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[54] *Keeping the Lights On: Examining the State of Reg'l Grid Reliability Before the House Comm. on Energy & Commerce*, Subcomm. on Energy, 119th Cong., at 5 (Mar. 25, 2025) (statement of Ms. Jennifer Curran, Senior Vice President for Planning and Operations, MISO), https://www.congress.gov/119/meeting/house/118040/witnesses/HHRG-119-IF03-Wstate-CurranJ-20250325.pdf.

[55] *Id.* at 6.

[56] *Id.* at 7.

[57] Although the text of FPA section 202(c) grants this authority to "the Commission," section 301(b) of the Department of Energy Organization Act transferred this authority to the Secretary of the Department of Energy. *See* 42 U.S.C. § 7151(b).

section 202(c), Culley Unit 2 shall be made available for operation through December 18, 2026.[58]

[58] 16 U.S.C. § 824a(c)(4).

Based on my determination of an emergency set forth above, I hereby order:

A. From September 20, 2026, MISO and CenterPoint Energy shall take all measures necessary to ensure that Culley Unit 2 is available to operate. For the duration of this Order, MISO is directed to take every step to employ economic dispatch of Culley Unit 2 to minimize cost to ratepayers. Following the conclusion of this Order, sufficient time for orderly ramp down is permitted, consistent with industry practices. CenterPoint Energy is directed to comply with all orders from MISO related to the availability and dispatch of Culley Unit 2.

B. To minimize adverse environmental impacts, this Order limits operation of Culley Unit 2 to the times and within the parameters as determined by MISO, pursuant to paragraph A. MISO shall provide a daily notification to the Department (via AskCR@hq.doe.gov) reporting whether Culley Unit 2 has operated in compliance with this Order.

C. All operations of Culley Unit 2 must comply with applicable environmental requirements, including but not limited to monitoring, reporting, and recordkeeping requirements, to the maximum extent feasible while operating consistent with the emergency conditions. This Order does not provide relief from any obligation to pay fees or purchase offsets or allowances for emissions that occur during the emergency conditions or to use other geographic or temporal flexibilities available to generators.

D. By October 3, 2026, MISO is directed to provide the Department (via AskCR@hq.doe.gov) with information concerning the measures it has taken and is planning to take to ensure the operational availability of Culley Unit 2 consistent with this Order. CenterPoint Energy and MISO shall also provide such additional information regarding the environmental impacts of this Order and its compliance with the conditions of this Order, in each case as requested by the Department from time to time.

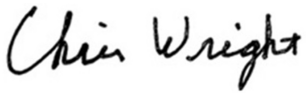
E. CenterPoint Energy is directed to file with FERC tariff revisions or waivers to effectuate this Order, as needed. Rate recovery is available pursuant to 16 U.S.C. § 824a(c).

F. This Order shall not preclude the need for Culley Unit 2 to comply with applicable state, local, or Federal law or regulations following the expiration of this Order.

G. Because this Order is predicated on the shortage of facilities for generation of electric energy and other causes, Culley Unit 2 shall not be considered a capacity resource.

H. This Order shall be effective from September 20, 2026, through December 18, 2026, with the exception of applicable compliance obligations in paragraph D.

Issued in Washington, D.C. on this 18th Day of September 2026.



Chris Wright
Secretary of Energy

cc: **Federal Energy Regulatory Commission**
Chairman Laura V. Swett
Commissioner David Rosner
Commissioner Lindsay S. See
Commissioner Judy W. Chang
Commissioner David A. LaCerte

Indiana Utility Regulatory Commission
Chairman Anthony Swinger
Commissioner Joshua Bain
Commissioner Bob Deig
Commissioner Joby Jerrells
Commissioner David Ziegner

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 205
MISO Market Capacity Emergency Rev. 25

MISO Market Capacity Emergency

SO-P-EOP-11-002 Rev: 25

ROLE			ROLE	
BAO	☑		SM	☑
IRAC	☑		RC	☑
UDS	☑		G&I	☑
SOE	☑		LBA	☑
TOP	☑		MP	☑
GOP	☑		ORM	☑

Rev History	Reason for Issue	Revised By	Issue Date	Effective Date
25	Replaced RTOpsCompliance@misoenergy.org email reference with DOENERCEventReporting@misoenergy.org	Alessandro Stammes	08/24/2026	08/24/2026
24	Out-of-Cycle Review. Removed Max Gen Alert. Consolidated content into Max Gen Warning step. Condensed Event Steps 1a-5 into distinct Event Steps aligned with NERC EEA levels. Grammar, formatting, sentence construction. Updated Attachment 1, 6, 7, and 8 tables and figures. Added Attachment 9 and 10 for MCE Checklists. Compliance Review Completed. Operating procedure owner approval on file. Removed mentions of SO-I-EOP-00-001 Utilizing Emergency Ranges and Emergency and VOLL Pricing (retired).	Don Hunter/ Alessandro Stammes/Josh Womack/Austin Francis	6/1/2026	6/1/2026

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1.0 Purpose

Provide a set of Emergency operating instructions to address Capacity Emergencies and Energy Emergencies within the MISO Balancing Authority Area (MBAA), including preparation, management, and recovery from an Emergency.

2.0 Precautions and Limitations

1. As conditions require, MISO may provide instructions to move directly to any section or step within this procedure. Actions described in earlier levels or steps should still be completed as time permits.
2. If sufficient relief is obtained during the implementation of an action during a declaration step, subsequent actions within that declaration step do NOT need to be taken.
3. The Operating Reserve Requirement for the MBAA consists of Regulation and Contingency Reserve Requirements.
4. The Operating Reserve Requirement for a Region or Sub-Area consists of a Contingency Reserve Requirement based on the Most Severe Single Contingency (MSSC) within its boundaries.
5. Available economic Resources are calculated from the Available Economic Maximum Limits, including Behind the Meter Generation (BTMG), minus capacity that cannot be committed due to congestion or excessive Time-to-Start, and adjusted for Constraint Stranded MW and Net Scheduled Interchange (NSI) obligations.
6. South Region available economic Resources are the South Available Economic Maximum Limits (including BTMG, but reduced by Resources that cannot be committed due to congestion or excessive Time-to-Start), adjusted for South Constraint Stranded MW, Regional Dispatch Transfer (RDT) NSI, and Resources from the North/Central Region that are deliverable to the South via the RDT up to the Regional Dispatch Transfer Limit (RDTL) — typically 3,000 MW.
7. The Reserve Margin Entry Condition for an MBAA Capacity Advisory includes allowance for loss of the MSSC and subsequent recovery within 90 minutes for the second MSSC (if applicable), plus uncertainties.

8. Reserve Margin Entry Conditions will be based on the forecasted uncertainty level for the given operating day(s).
9. MISO will use the Mid-Term Load Forecast (MTLF) or Short-Term Load Forecast (STLF), as applicable, to determine available Operating Reserves. MISO may adjust Load Forecast values based on sustained error over time and will document the reasons for any adjustment.
10. Transmission System Emergencies requiring immediate action will be declared and resolved per SO-P-EOP-00-004 Transmission System Emergency. Transmission constraints that limit energy transfers to the MBAA or a sizable Sub-Area of the MBAA and result in a Capacity or Energy Emergency for such area will be managed through this procedure.
11. Energy deficient BA obligations include taking immediate actions to mitigate any undue risk to the Interconnection, including Load shedding, if required.
12. MISO posts the Max Gen Declaration notification to the MISO Market and Operations — Real-Time Operations Website.
13. Depending on the urgency of the Max Gen Emergency, manual Load Shedding may be used to control the Emergency at any time. This includes the immediate shedding of Load to return the Area Control Error (ACE) to zero.
14. MISO's posting of the Max Gen Declaration notification to the RT Ops Website via Operator Interface (OI) serves as notice of the existence and duration of the conditions requiring the implementation of the procedures set forth in Section 40.2.20 of the Tariff. Historical Max Gen Declarations can be found on MISO’s Open Access Same Time Information System (OASIS) page.
15. MISO will render all available Emergency assistance to others, as requested, in accordance with SO-I-NOP-00-479 Purchasing and Selling Emergency Energy, provided that the requesting entity has implemented their comparable Emergency procedures, unless such actions violate safety, equipment, regulatory, or statutory requirements.
16. If MISO is unable to issue Load Modifying Resource (LMR) implementation instructions through the MCS-LMR Tool, operators will reference LMR availability in CSAT or other resources, assuming the LMR database remains available, and issue implementation instructions via Operator Interface (OI) or verbal communication, as appropriate.
17. MISO Shift Manager (SM) should evaluate additional staffing requirements per SO-I-NOP-00-441 Real-Time Event Resolution.

18. The Reserve Procurement Enhancement (RPE) objective for the RDT North-to-South is to elevate Market Clearing Prices (MCP) and energy prices in the South Region to clear additional Contingency Reserves, allowing recovery of the RDT Flow to 116% post-contingent of the South MSSC. Operators must then determine how to further reduce the RDT Flow to 100%. When RPE on RDT is violated, additional generation should be started.
19. An infographic of MISO's Market Capacity Emergency Procedure steps is included in Attachment 8 — Summary of Market Capacity Emergency Procedure Steps.
20. An Emergency Operations Resource (EOR) is an online Generation Resource that is not an online Fast Start Resource and is started, synchronized, and injecting Energy, or a Demand Response Resource that reduces its Energy consumption, within two hundred forty (240) minutes of being notified, and that has a minimum run time of less than four (4) hours, and that will participate in setting price as described in Schedule 29A of the MISO Transmission, Energy, and Operating Reserve Market Tariff. EORs participate in setting prices automatically when either the Emergency Tier I or Tier II Offer Floors are established.
21. Refer to applicable Work Level Instructions (WLIs) for detailed step and tools. WLIs are internal and maintained by the role's business area and may change independently of this procedure. In the event of any conflict between a WLI and this procedure, the requirements in this procedure take precedence. WLIs maybe accessed by MISO Operators in the Work Level Instruction Index.

2.0 Roles and Responsibilities

1. In addition to the roles and responsibilities in SO-P-EOP-11 MISO Emergency Operation Plan, the following also apply:
   - MISO Operations Risk Management (ORM) Team
     - Issues forward-looking Market Capacity Declarations up to and including the FRAC Next Day (ND) Case.
     - Coordinates with the Shift Manager (SM) prior to issuance.
     - Capacity Advisories may be issued up to 5 days in advance but must be declared no later than 23:59 EPT the day prior to the operating day.
     - Capacity Advisories are not issued on a same-day basis, as the real-time process begins after the FRAC Handoff.
   - MISO Shift Manager (SM)
     - Issues real-time Market Capacity Declarations after the FRAC ND Handoff per SO-I-NOP-00-491 FRAC Handoff procedure, based on current system conditions.
     - Coordinates with the ORM Team prior to issuance.

3.0 Entry Conditions

3.1 Capacity Advisory

1. Entry conditions are based on the Reserve Margin, which is the Total Operating Reserves compared to the Operating Reserve Requirement, either in MW or as a % of the Load, plus Operating Reserve Requirements. See Attachment 1 — Reserve Margin Example Calculations for examples.
   - Reserve Margin:
     Total Operating Reserves - Operating Reserve Requirement
   - Reserve Margin (%):
     100 * (Total Operating Reserves - Operating Reserve Requirement) / (Load + Operating Reserve Requirement)
   - Total Operating Reserves MBAA:
     (Avail Eco Max - Constraint Stranded MW - NSI) - Load
   - Total Operating Reserves South Region:
     (Avail Eco Max - Constraint Stranded MW - RDT NSI + RDTL) - Load

ORM/ SM

Note

- IF Reserve Margin thresholds are forecasted below the associated uncertainty level, THEN:
- A Capacity Advisory may be declared up to 5 days in advance but must be declared no later than 23:59 EPT the day prior to the operating day.
- Capacity Advisories are not issued on a same-day basis.
- The decision to declare a Capacity Advisory may also consider other information such as time frame, weather, and other uncertainty factors.
- Increasing the Reserve Margin Entry Conditions may be required.

2. IF the following conditions are identified, THEN **PERFORM** Section 4.1 Capacity Advisory: [□]
   - MBAA, Region, or Sub-Area forecasted Reserve Margin is less than the Reserve Margin threshold based upon the associated forecasted uncertainty level.

3.2 Max Gen Warning

SM

Note

A negative Reserve Margin means that Load and Operating Reserve Requirements cannot be met with normal economic Resources. In this scenario, a Max Gen Warning or Event should be declared.

1. IF the following condition is identified, THEN **PERFORM** Section 4.2.3 Max Gen Warning - MISO Actions: [□]
   - MBAA, Region, or Sub-Area actual or forecasted Reserve Margin is less than zero.

3.3 Max Gen Event

SM

1. IF the following condition is identified, THEN **PERFORM** Section 4.2.3 Max Gen Event Step 1: [□]
   - MBAA, Region, or Sub-Area actual or forecasted Reserve Margin is less than zero, **and**
   - Warning level actions are NOT sufficient.

4.0 Instructions

4.1 Capacity Advisory

ORM/ SM

4.1.1 Capacity Advisory - MISO Actions

1. **COMMUNICATE** Capacity Advisory as follows: [□]
   - A. **DEFINE** the boundaries of the Capacity Advisory area. [□]
   - B. **DEFINE** the start and end time of the Capacity Advisory and **COMMUNICATE** those times to the UDS Operator to allow STR Default and RPE MSSC Overrides to be entered. [□]
   - C. **SEND** the Capacity Advisory declaration to affected members via OI per SO-I-NOP-00-448 Event Communications Matrix. [□]
   - D. **SEND** the Capacity Advisory declaration via Reliability Coordinator Information System (RCIS). [□]
   - E. **DECLARE** Conservative System Operations per SO-P-NOP-00-449 Conservative System Operations, if conditions warrant and not already declared. [□]

SM

2. IF OI is unavailable, or the SM determines a conference call is necessary, THEN **PERFORM** a conference call with affected reliability entities per SO-P-NOP-00-483 Reliability Coordination Conference Call. [□]

SM

3. IF a significant shortage of Operating Reserves is anticipated in any Reliability Assessment Commitment (RAC) process, THEN **DETERMINE** whether to issue LMR Scheduling Instructions in anticipation of a Max Gen Emergency Event Step 2 or higher. [□]
   - A. **SEND** an informational message via OI to the impacted area(s) indicating that LMRs have been called in

anticipation of a Max Gen Emergency. [□]

B. **SEND** LMR Scheduling Instructions (from longest to shortest lead time) via MISO Communication System (MCS) for the forecasted Max Gen Emergency. [□]

UDS

Note

For Steps 4 to 8, **REFER** to Attachment 7 — UDS Operator Actions During a MISO Market Capacity Emergency. **[See WLI: BA/UDS]**

4. IF a Capacity Advisory or higher is declared for the North/Central Region only, THEN **OVERRIDE** the STR RPE MSSC Default value(s) for Non-Zone only in the Energy Market Displays (EMD) Global Reserve Requirements menu, for the duration of the Capacity Advisory or higher declaration. [□]

UDS

5. IF a Capacity Advisory or higher declaration is made for the North/Central Region and a Capacity Advisory or higher declaration is added for the South Region, THEN **OVERRIDE** the System-Wide STR Default value(s) and **OVERRIDE** the South Region STR RPE MSSC in Zone 8 in the EMD Global Reserve Requirements menu for the duration of the Capacity Advisory or higher declaration. [□]

UDS

6. IF a Capacity Advisory is declared for the South Region only, THEN **OVERRIDE** the STR RPE MSSC Default value(s) for Zone 8 only in the EMD Global Reserve Requirements menu for the duration of the Capacity Advisory or higher declaration. [□]

UDS

7. IF a Capacity Advisory or higher declaration is made for the South Region and a Capacity Advisory or higher declaration is added for the North/Central Region, THEN **OVERRIDE** the System-Wide STR Default value(s) and **OVERRIDE** the North/ Central STR RPE MSSC for Non-Zone in the EMD Global Reserve Requirements menu for the duration of Capacity Advisory or higher declaration. [□]

ORM/UDS/SM

8. IF a System-Wide Capacity Advisory is declared, THEN **OVERRIDE** the STR Default value(s), the North/Central STR RPE MSSC for Non-Zone, and the South Region STR RPE MSSC for Zone 8 in the EMD Global Reserve Requirements menu, for the duration of the Capacity Advisory or higher declaration. [□]

ORM/ UDS/SM 9. **NOTIFY** Day Ahead (DA) and Forward Reliability Assessment and Commitment (FRAC) Operators when STR updates are complete. [□]

4.1.2 Capacity Advisory - MISO Stakeholder Actions

1. WHEN notified by MISO, THEN **ENSURE** all market data is updated with the best available information for the operating day(s), including the following: [□]
   - Facility and generation availability, outages, and de-rates
   - Generation Offers, including any changes to reflect fuel availability
   - Fuel supply and inventory concerns
   - Fuel switching capabilities
   - Environmental constraints
   - Load forecast Values
   - LMR Availability in the DSRI Tool
   - Voluntary Load Management information
   - Load Management Measures (LMM) and any Voluntary Load Management in the MCS
   - Emergency Demand Response (EDR) offers

MP

Note

LMRs should be implemented at NO less than the MW amount scheduled and following the guidelines provided by MISO.

2. IF notified by MISO, THEN **IMPLEMENT** LMRs. [□]

MP 3. **UPDATE** the DSRI Tool as follows: [□]

   A. **NAVIGATE** to the Active Event by selecting one of the following: [□]
      - The Scheduling Instruction event banner
      - The Active Event from the dashboard
      - The Events tab

   B. **REVIEW** the Event Timeline and LMR Instructions broken down by each LBA. [□]

   C. **ACKNOWLEDGE** the LMR Scheduling Instructions. [□]

   D. **NAVIGATE** to the Resource Deployment tab of the Active Event. [□]

   E. **ENTER** and **SUBMIT** the MW Amounts of Resources that will be deployed to meet the LMR Scheduling Instruction obligation per LBA. [□]

   F. Upon receiving the LMR Scheduling Instruction, **UPDATE** the LMR Availability for all Resources designated to respond, ensuring their availability accurately reflects what is now accessible to MISO. [□]

4.2 MISO Actions during a Max Gen Emergency

4.2.1 Max Gen Declaration - MISO Actions

SM 1. **DECLARE** applicable Max Gen Warning/Event as follows: [□]

A. **DEFINE** the boundaries of the declaration area. [□]

B. **DEFINE** the start and end time of the declaration. [□]

C. **SEND** the Max Gen Declaration via OI per SO-I-NOP-00-448 Event Communications Matrix. [□]

D. **SEND** the Max Gen declaration summary information via RCIS within 30 minutes. [□]

SM 2. **ENSURE** Conservative System Operations has been declared per SO-P-NOP-00-449 Conservative System Operations. [□]

SM 3. IF OI is unavailable or the SM determines whether a conference call is necessary, THEN **PERFORM** a conference call with affected reliability entities per SO-P-NOP-00-483 Reliability Coordination Conference Call. [□]

Note

- Actions are taken to preserve Resources dedicated to firm Load and to maintain Operating Reserves.
- Actions available at this level should be fully utilized, time permitting, by all entities within the defined declaration area prior to declaring an Emergency.

4.2.2 Max Gen Warning - MISO Actions

SM 1. IF starting the declaration at a Max Gen Warning or escalating from a Capacity Advisory, THEN **DECLARE** Max Gen Warning per Section 4.2.1 Max Gen Declaration - MISO Actions. [□]

UDS 2. **IMPLEMENT** Emergency Pricing – Tier I in EMD **[See WLI: BA/UDS]**. [□]

SM

Note

This survey is to gain an idea of the amount of LMM Load reduction expected to be available, if needed.

SM 3. **SEND** a survey via the MCS LMM Tool in the Load Management Tab to LBAs to ensure LMM information is updated. [□]

A. IF the Drill Mode is currently on, THEN **ENSURE** to “Switch to Live Mode.” [□]

BAO 4. IF changes in Operating Reserve availability are identified, THEN **NOTIFY** the SM. [□]

IRAC 5. **ENSURE** available economic Resources are committed to meeting Load, firm transactions, and reserve requirements. [□]

RC

Note
The following analysis should be completed in time for implementation during the Warning declaration.

6. **COORDINATE** with neighboring Reliability Coordinators (RCs) and MISO TOPs to raise transfer capability into the declaration area or make available Constraint Stranded MW from generation (on- or off-line) in the declaration area, including review of Transmission Loading Relief (TLR) activity, binding constraints, available reconfiguration options, and use of short-term Emergency ratings. [□]

SM 7. **REVIEW** EDR offers to determine EDR availability and MW amounts for the Warning period. [□]

SM 8. **OBTAIN** updated MW relief amount available during the effective Warning period by LBA from MCS.

- LMMs – Stage 1
- LMMs – Stage 2

SM 9. **REVIEW** LMR availability in the MCS-LMR Tool for the declaration period. [□]

SM/BAO 10. **DIRECT** the following actions to raise forecasted capacity:

A. **TERMINATE** Inadvertent Payback process pe SO-I-NOP-00-462 Inadvertent Interchange Management, if required to assist system conditions. [□]

B. **DETERMINE** if a request for Time Error Correction termination should be made per SO-P-NOP-00-455 Balancing Authority Operations. [□]

SM 11. **SEND** OI message to MPs to schedule remaining available External and Internal Resources (Module E Registered Capacity Resources) that are deliverable to the Warning area, considering transmission constraints. [□]

G&I 12. **NOTIFY** the SM of forecasted changes in MBAA NSI due to loss of imports. [□]

G&I 13. **MODIFY** webTrans E-tag validation mode to reflect the Max Gen in affected area (North, South, or All) per SO-I-EOP-00-006 Interchange Scheduling Operations during Emergency Conditions. [□]

G&I 14. **SUSPEND** Coordinated Transaction Scheduling (CTS) for the duration of the Capacity Emergency per SO-I-AOP-00-224 CTS Failure Modes. [□]

A. **COMMUNICATE** CTS suspension to PJM. [□]

G&I 15. **COORDINATE** to determine amount of non-firm and firm Export Schedules to curtail, as identified below. [□]

G&I 16. IF Export Schedule Limits are exceeded, THEN **CURTAIL** Export Schedules from the declaration area in amounts required to relieve shortage conditions in the following order per SO-I-EOP-00-006 Interchange Scheduling Operations during Emergency Conditions: [□]

A. Non-Firm Transmission Schedules.
B. Firm Schedules from Capacity (Module E) Resources that are NOT meeting their Schedule and Capacity requirements.
C. Firm Schedules from non-Capacity (Module E) Resources that are NOT meeting their Schedule requirements.
D. Firm Transmission schedules from Power Purchase Agreements (PPAs) that represent a Fleet of Resources, when those Resources are NOT meeting their collective Resource obligation.

G&I 17. **COORDINATE** with MPs to schedule in any non-scheduled MWs from external Resources up to their cleared Module E Capacity obligation. [□]

SM 18. IF forecasting an escalation to Max Gen Event Step 2 or higher, THEN **NOTIFY** GOPs via OI in the declaration area with Generators de-rated due to environmental restrictions, and request that they obtain waivers from the appropriate government agencies. [□]

RC 19. **NOTIFY** TOPs to implement reconfiguration options agreed upon to raise transfer capability into the declaration area or to make available Constraint Stranded MW from generation in the declaration [□]

Note

AME are Resources with a commit status of Emergency. If all available generation Resources are in use, proceed to Max Gen Event Step 1 and Declare EEA1.

IRAC/SM 20. **COMMIT** the following Available Max Emergency (AME) designated Resources and declare Max Gen Event Step 1 and EEA 1: [□]

- Generation Resources
- Demand Response Resources – Type 1
- Demand Response Resources – Type 2

ALL 21. **LOG** all actions taken and relevant information in response to the declaration. [□]

4.2.3 Max Gen Event Step 1 - MISO Actions

SM

Note

Actions in this section are taken to attempt to preserve Resources dedicated to firm Load and maintaining Regulating Reserves.

1. IF starting the declaration at a Max Gen Event Step 1 or escalating from a lower Max Gen level, THEN **DECLARE** Max Gen Event 1 and EEA1 per Section 4.2.1 Max Gen Declaration - MISO Actions.
   Actions. [□]

SM 2. **NOTIFY** On-Call Director to implement SO-P-AOP-00-217 MISO and State Officials 24X7 Communication Protocols During Emergencies. [□]

IRAC/ UDS

Note

The IRAC Operator ensures Emergency Ranges are available for use by UDS, and the UDS Operator verifies these ranges as preliminary actions to implementing them in Event Step 1.

UDS 3. IF Warning step skipped, THEN **IMPLEMENT** Emergency Pricing – Tier I in EMD **[See WLI: BA/UDS]**.

4. **ENSURE** unit Emergency Ranges are pushed in EMD . [□]

IRAC/ UDS

Note

Resources selected to provide Regulating Reserve for each Generation Resource, Demand Response Resource – Type II, and External Asynchronous Resource for use in MISO's RAC, Automatic Generation Control (AGC), and UDS for the MBAA (or Sub-Area due to a transmission constraint) are to be excluded when implementing Emergency Maximum Limits.

5. **ACTIVATE** Emergency Maximum Limits in EMD **[See WLI: BA/UDS]**. [□]

ALL 6. **LOG** actions taken and relevant information in response to the declaration. [□]

4.2.4 Max Gen Event Step 2 - MISO Actions

SM

Note

- LMM – Stage 1 and LMRs are utilized on a pro-rata basis within the declaration area based on availability of those actions, except for EDRs, which are committed in merit order.
- LMRs can be called in anticipation up to one hour prior to their required notification time. If MISO does NOT declare a Max Gen Emergency Event Step 2 or higher at least two hours prior to the start of the Scheduling Instructions issued in anticipation, then, the LMRs are NOT obligated to perform.

1. IF starting the declaration at a Max Gen Event Step 2 or escalating from a lower Max Gen level, THEN **DECLARE** Max Gen Event Step 2 and EEA2 per Section 4.2.1 Max Gen Declaration MISO Actions. [□]

UDS

2. **IMPLEMENT** Emergency Pricing - Tier II in EMD **[See WLI: BA/UDS]**. [□]

SM

3. **DETERMINE** Manitoba Hydro's EEA status. [□]

SM

4. IF Manitoba Hydro is in an EEA concurrently with MISO's EEA2 or higher, THEN **PERFORM** SO-I-NOP-00-481 MISO-Manitoba Hydro Concurrent EEA. [□]

SM

Note

- One MW value will be provided per LBA for Load reduction.
- Determination of individual LMMs to be utilized will be managed at the LBA level.
- Reduction MW amounts for each LBA will be determined by proration of the total amount available in the declaration area.
- If OI is unavailable, notifications will be made via phone.
- LMR Load reduction amounts communicated to LBAs are for information only; LBAs do not implement LMRs

5. **NOTIFY** LBAs of required Load reduction via LMM – Stage 1 and LMRs in MW amounts via MCS. [□]

SM

6. **COORDINATE** with MPs on implementing LMRs as follows: [□]

Note

LMR implementation amounts are determined by taking prorated amount of LMR availability in each LBA area as compared to total available in the declaration area, and based upon registration profile of each LMR, within the tolerances as set in the MCS-LMR Tool.

A. **DETERMINE** LMR implementation amounts by MPs. [□]

B. **PROVIDE** a MW minimum implementation amount to each MP based upon this pro-ration and profile of registered LMRs via MCS-LMR Tool. [□]

SM 7. **DETERMINE** OE-417 reporting responsibilities per SO-P-NOP-04 MISO Event Reporting Operations Plan. [□]

SM 8. **ENSURE** required notifications are performed per SO-I-NOP-00-448 Event Communications Matrix. [□]

SM 9. **COMMIT** EDR Resources, in merit order, to alleviate capacity shortages within the declaration area per SO-I-NOP-00-404 Emergency Demand Response Implementation. [□]

SM 10. **COORDINATE** with neighboring RCs and BAs to determine Emergency Energy available from external sources, either through interruptible firm Load or through Emergency Energy purchases. [□]

SM 11. **IMPLEMENT** Emergency Energy purchases from neighboring BAs to conserve Operating Reserves per SO-I-NOP-00-479 Purchasing and Selling Emergency Energy. [□]

SM 12. **EVALUATE** opportunities to reduce internal energy usage, such as sending non-essential personnel home, reducing lighting that is non-essential for personnel safety, and reducing large electric Loads. [□]

Note

DOE Form OE-417 filing requirements for issuing Public Appeals is the responsibility of the LBA.

SM 13. **INSTRUCT** LBAs in the declaration area to issue public appeals to reduce demand per their internal procedures. [□]

14. **NOTIFY** GOPs via OI in the declaration area with Generators de-rated due to environmental restrictions, instructing them to implement waivers from the appropriate government agencies [□]

SM

Note

Reduction of MW amounts for each LBA will be determined on a pro-rate basis of the total amount available in the declaration area.

SM 15. **NOTIFY** LBAs, via MCS, of the required Load reduction (in MW of interruptible demands) via LMM – Stage 2. [□]

RC 16. **COORDINATE** with neighboring RCs and BAs to identify additional available Emergency Energy, including Operating Reserves. [□]

G&I 17. **IMPLEMENT** Emergency Energy purchases from neighboring BAs per SO-I-NOP-00-479 Purchasing and Selling Emergency Energy. [□]

BAO 18. **IMPLEMENT** use of MISO's spinning and supplemental reserves, as needed and as time permits. [□]

SM 19. IF Contingency Reserves fall below minimum required (MSSC) for greater than 30 minutes and NO reasonable actions exist to restore them within 90 minutes, THEN **DECLARE** Max Gen Event Step 3 and EEA3 per Section 4.2.1 Max Gen Declaration - MISO Actions. [□]

BAO 20. **IMPLEMENT** a Reserve Call from Contingency Reserve Sharing Group (CRSG), utilizing MHEB's available contingency reserves. [□]

IRAC 21. **EVALUATE** the exclusion of Regulating Units that have room between Reg Max and Emergency Max from clearing Reg in EMD. [□]

Note
The SM and IRAC should coordinate to maintain an appropriate amount of Regulating Reserves to avoid shedding firm Load for normal ACE deviations.

ALL 22. **LOG** actions taken and relevant information in response to the declaration. [□]

4.2.5 Max Gen Event Step 3 - MISO Actions

SM 1. IF starting the declaration at a Max Gen Event Step 3 or escalating from a lower Max Gen level, THEN **DECLARE** Max Gen Event Step 3 and EEA3 per Section 4.2.1 Max Gen Declaration - MISO Actions. [□]

SM
Note
Attachment 4 — Slice-of-System PPAs Load/Schedule Curtailment provides additional information regarding sharing of Load shedding with Slice-of-System PPAs.

2. **DETERMINE** manual Load Shedding requirements. [□]

SM
Note
Issuing Emergency Operating Instructions for firm Load shed is based on the ratio of LBA forecasted or actual Load to the total forecasted or actual Load of the declaration area, considering applicable transmission security requirements.

SM

Note

The Shift Manager will ensure that firm Load Shed points are known and members are prepared to execute Load Shed when reserves are depleted and additional action is required such as increasing Load conditions or ACE recovery from generation loss.

3. **ISSUE** Emergency Operating Instructions to LBAs in the declaration area for MW amounts of Load to shed via the MCS Firm Load Shed Tool or verbally per SO-P-NOP-10-431 Communications Protocol for Operating Instructions [□]

UDS

4. WHEN notified by MISO SM, THEN **PERFORM** the following:
   A. In the EMD UDS tab, **CHECK** the appropriate box(es) in the column titled "Is Voll Price Enforced" for the applicable LBAs,. This action sets LMPs and MCPs to the Value of Lost Load (VOLL) **[See WLI: BA/UDS]**. [□]
   B. **SAVE** updates. [□]

SM

5. IF firm Load Shed is greater than 100 MW, THEN **DETERMINE** OE-417 reporting responsibilities per SO-P-NOP-04 MISO Event Reporting Operations Plan. [□]

SM

6. **ENSURE** required notifications are performed per SO-I-NOP-00-448 Event Communications Matrix. [□]

ALL

7. **LOG** actions taken and relevant information in response to the declaration. [□]

4.2.6 Max Gen Event Downgrade/Termination - MISO Actions

SM

Note

- Steps and levels during Termination may be skipped, as appropriate, based on system conditions and projections.
- Emergency steps shall be exited in a controlled and deliberate manner to avoid adversely affecting system reliability, while also minimizing the impact of these Emergency actions on the Load Serving Entities (LSEs).

1. WHEN actual obligations return below total MISO capability, THEN **DOWNGRADE/TERMINATE** Max Gen Event as follows: [□]

SM

   A. **SEND** Max Gen Downgrade/Termination to affected members via OI per Section 4.2.1 Max Gen Declaration - MISO Actions. [□]

UDS

   B. IF Max Gen Event Step 3 is being terminated, THEN **UNCHECK** the box(es) in EMD that previously set all LMPs and MCPs to the Value of Lost Load (VOLL). [□]

G&I C. **ENSURE** CTS is enabled per SO-I-AOP-00-224 CTS Failure Modes [□]

G&I D. **RETURN** webTrans E-tag validation to normal mode per SO-I-EOP-00-006 Interchange Scheduling Operations during Emergency Conditions. [□]

G&I E. **TERMINATE** any Emergency Energy purchases made during the event, as necessary. [□]

G&I F. **RELOAD** any Export curtailments made during the event, as necessary. [□]

IRAC G. **EVALUATE** and **DECOMMIT** any online Emergency generation (AME) that has met its Min Runtime. [□]

SM H. **PERFORM** necessary actions to back out of steps taken, in reverse order. [□]

UDS I. IF an STR requirement override is NOT needed for the remainder of the declared Emergency, THEN **REMOVE** STR requirement override in EMD from STR Default and STR MSSC Non-Zone and South Zone 8. [□]

SM 2. **ENSURE** all notifications are performed per SO-I-NOP-00-448 Event Communications Matrix. [□]

ALL 3. **LOG** actions taken and relevant information in response to the declaration. [□]

4.3 MISO Stakeholder Actions during a Max Gen Emergency

4.3.1 Max Gen Warning - MISO Stakeholder Actions

Note

Deferring generation/transmission maintenance until the Max Gen declaration has been terminated ensures trips are minimized.

1. **FOLLOW** MISO's SO-P-NOP-00-449 Conservative System Operations procedure. [□]

2. **DETERMINE** potential exclusions of constrained pockets within the declaration area where there is expected to be adequate generation that may NOT be transferred to other parts of the declaration area due to local constraints. [□]

TOP 3. **INFORM** MISO RC of identified constrained areas. [□]

GOP 4. IF generators are de-rated, THEN **PERFORM** the following:

GOP A. INFORM the following stakeholders of capacity-limited facilities: [□]

- LBAs
- TOPs
- MISO G&I Operator

GOP 5. **UPDATE** Limits and Offers. [□]

MP

Note

- Schedules that source from a Resource that is identified as a Capacity Resource in Module E for a MISO LSE must be identified in the tagging process per MISO BPM-007 Physical Scheduling Business Practice Manual Section 16 - Capacity Resource Scheduling.
  This also includes a Generation Resource internal to the MBAA that is identified as a Capacity Resource for an external BA.

MP 6. **ENSURE** accuracy of LMR availability and Self-Scheduled/ Voluntary Load Management LMRs in the DSRI Tool. [□]

LBA 7. **ENSURE** accuracy of Non-LMR Voluntary Load Management/ Self-Scheduled LMM information in the MCS-LMR Tool. [□]

TOP 8. **COORDINATE** with the MISO RC to determine reconfiguration options to raise transfer capability into the declaration area or to make available Constraint Stranded MW[□] from generation in the declaration area.

LBA 9. Based on Load Shed methodology, **PREPARE** for potential Load Shed during an Event stage. [□]

MP 10. **UPDATE** EDR offers for availability and MW amounts for the declaration period. [□]

LBA 11. **SUBMIT** LMM availability via MCS per Attachment 3 — Load Management Update Form Example. [□]

MP 12. **ENSURE** accuracy of registered LMR availability in the DSRI Tool. [□]

MP 13. **SCHEDULE** remaining available External and Internal Resources (Module E Registered Capacity Resources) that are deliverable to the declaration area. [□]

LBA 14. **NOTIFY** Interruptible Loads of potential interruption. [□]

LBA

.

15. **DETERMINE** whether Generators are de-rated due to environmental restrictions, and request waivers from the appropriate government agencies as directed by MISO. [□]
16. **IMPLEMENT** agreed upon reconfiguration options to raise transfer capability into the declaration area or to make Available Constraint Stranded MW from generation in the declaration area. [□]
17. WHEN notified by MISO, THEN **START** applicable off-line AME Generation Resources. [□]

4.3.2 Max Gen Event Step 1 - MISO Stakeholder Actions

GOP

Note

- MPs should ensure Emergency Range limits reflect actual Resource capabilities.
- Specific information, limitations, and concerns regarding Emergency Range usage should be communicated to the MISO G&I Operators, as applicable.

1. WHEN Resources are dispatched, THEN **ENSURE** Resources move into Emergency Ranges. [□]

2. **ENSURE** all co-generation and independent power producers are at maximum output and availability. [□]

3. IF additional reliability capacity is available (such as adding additional mills, duct burners, etc.), THEN **COORDINATE** adjustments with the MISO G&I Operator. [□]

4.3.3 Max Gen Event Step 2 - MISO Stakeholder Actions

LBA 1. IF in the declaration area and notified by MISO to reduce Load via LMM – Stage 1, THEN **PERFORM** the following: [□]

LBA A. **REDUCE** Load via LMM – Stage 1. [□]

LBA

Note

- Reductions through Load Management are NOT precise to the MW.
- Determination of individual LMMs to be utilized will be managed at the LBA level.

B. WHEN Load reduction actions have been implemented, THEN **NOTIFY** MISO. [□]

MP

Note

LMRs should be implemented at NO less than the MW amount scheduled and following the guidelines provided by MISO.

2. WHEN notified by MISO, THEN **IMPLEMENT** LMRs. [□]

MP 3. **UPDATE** the DSRI Tool as follows: [□]

A. **NAVIGATE** to the Active Event by selecting one of the following: [□]

- The Scheduling Instruction event banner
- The Active Event from the dashboard
- The Events tab

B. **REVIEW** Event Timeline and LMR Instructions broken down by each LBA. [□]

C. **ACKNOWLEDGE** LMR Scheduling Instructions. [□]

D. **NAVIGATE** to the Resource Deployment tab of the Active Event. [□]

E. **ENTER** and **SUBMIT** MW Amounts of Resources that will be deployed to meet the LMR Scheduling Instruction obligation per LBA. [□]

F. Upon receiving the LMR Scheduling Instruction, **UPDATE** the LMR Availability for all Resources designated to respond, ensuring their availability accurately reflects what is now accessible to MISO. [□]

MP 4. WHEN notified by MISO, THEN **COMMIT** EDR Resources. [□]

Note

- Public appeals to reduce demand is based on internal LBA procedures, system conditions, and Event projections provided by MISO.
- The public appeals should include an educational message on how the public may reduce demand and conserve power.
- DOE Form OE-417 filing requirements for issuing Public Appeals is the responsibility of the LBA.

LBA

5. WHEN instructed by MISO, THEN **ISSUE** public appeals to reduce demand per internal procedures. [□]

LBA

6. **EVALUATE** opportunities to reduce internal energy usage, such as sending non-essential personnel home, reducing lighting that is non-essential for personnel safety, and reducing large electric Loads.

LBA

7. IF in the declaration area, THEN **PREPARE** to shed Load. [□]

GOP

8. IF requested by MISO to dispatch available capacity THEN **DISPATCH** as follows: [□]
   A. **VERIFY** Generators in the declaration area with de-rates from environmental restrictions. [□]
   B. IF approved waiver from government regulations, THEN **DISPATCH** available generation. [□]

LBA

9. IF in the declaration area and notified by MISO to reduce Load via LMM – Stage 2, THEN **PERFORM** the following:
   A. REDUCE Load via LMM – Stage 2. [□]

Note

- Reductions through LMMs are NOT precise to the MW.
- Determination of individual LMMs to be utilized will be managed at the LBA level.

   B. WHEN Load reduction actions have been implemented, THEN **NOTIFY** MISO via MCS. [□]

GOP/ MP

10. **REVIEW** Offers. [□]

GOP/ MP

11. **ENSURE** all available Emergency Ranges and Resources are offered. [□]

GOP/ MP

Note

All Resources should be committed, producing energy or committed for reserves, except Emergency Ranges on Resources providing Regulating Reserves.

GOP/ MP

12. IF there are available Resources or capacity NOT being utilized, THEN **NOTIFY** the MISO G&I Operator. [□]

LBA

4.3.4 Max Gen Event Step 3 - MISO Stakeholder Actions

Note

In addition to ensuring Load shed schemes are capable of implementation in a time frame adequate for mitigating the Emergency for Load shed directed by MISO, LBAs are responsible for coordinating with TOPs for any Load shed requirements, critical load evaluation in Load shed schemes, and coordinating rotation of selected Loads with any other automatic Load shed schemes such as Underfrequency and Undervoltage. The minimum MISO directed Load shed per LBA should always be maintained until Load restore directions are provided by MISO.

1. **SHED** firm Loads per MISO issued Emergency Operating Instruction. [□]

LBA

2. **CONFIRM** actions taken with the MISO RC via MCS Firm Load Shed Tool or verbally per SO-P-NOP-10-431 Communications Protocol for Operating Instructions. [□]

LBA

3. IF requested by MISO during Event Step 3, THEN **COMPLETE** Department of Energy (DOE) Form OE-417 as follows: [□]
   A. **COMPLETE** DOE Form OE-417 for actions taken to reduce Load via Load Management Procedures per NERC EOP-004-4 and SO-P-NOP-04 MISO Event Reporting Operations Plan. [□]
   B. **SUBMIT** completed DOE Form OE-417 to the following: [□]
      - DOE
      - NERC
   C. **FORWARD** a copy of the submitted DOE Form OE-417 to the following: [□]
      - Regional Entities
      - DOENERCEventReporting@misoenergy.org

4.3.5 Max Gen Event Downgrade/Termination - MISO Stakeholder Actions

LBA/ MP/ TOP/ GOP

1. **PERFORM** requests of the MISO SM or designee to back out of each level. [□]

5.0. Definitions

1. **Reserve Margin** - The difference between Total Operating Reserves and the Operating Reserve Requirement.
2. **Constraint Stranded MW** - Resource MW that are NOT available to meet Load due to congestion on the electric grid.
3. **Emergency Demand Response (EDR)** - Load reductions, Behind the Meter Generation (BTMG), and other demand resources that are available to reduce demand or increase generation in exchange for guaranteed recovery of costs associated with the response in accordance with Schedule 30 (EDR Provisions) of the Tariff.
4. **Load Management Measures (LMM) Stage 1** – Load management actions that can be taken to reduce demand to preserve or maintain Operating Reserves that are NOT included in EDRs or LMRs.
5. **Load Management Measures (LMM) Stage 2** – Load management actions that can be taken to reduce demand including voltage reductions and reducing Loads that, by contract, CANNOT be interrupted until reserves are being or expected to be depleted and energy from Emergency Offers by Market Participants are being or expected to be depleted. These do NOT include EDRs or LMRs.
6. **Load Modifying Resource (LMR)** - These are either Demand resources or Behind the Meter Generation that have an obligation to reduce demand or increase generation during declared system emergencies.
7. **Maximum Generation (Max Gen) Capacity Advisory** - Provides advanced notice of forecasted capacity shortage and will request stakeholder update data.
8. **Max Gen Warning** - MISO foresees or is experiencing conditions where all available economic Resources are committed to meeting Load, firm transactions, and reserve requirements, and is concerned about sustaining required Operating Reserves.

9. **Max Gen Event** – IF MISO's forecasted or real-time energy demand and Operating Reserve Requirements within the MBAA (or Sub-Area due to a transmission constraint) CANNOT be satisfied with Economic Maximum Limits of all available Resources, then, MISO issues a Max Gen Event due to a shortage of economic Resources.

6.0 References

6.1 NERC References

1. EOP-011-4 Emergency Operations
   - R2.2.1[Section 4.1.1 Step 1.]
   - R2.2.2 [Section 4.2.3 Step 1.][Section 4.2.4 Step 1.] [Section 4.2.5 Step 1.]
   - R2.2.3 [Section 4.1.2]
   - R2.2.4 [Section 4.2.4 Step 13.]
   - R2.2.5 [Section 4.2.4 Step 14.]
   - R2.2.6 [Section 4.2.4]
   - R2.2.7
   - [Section 4.2.2 Step 11.][Section 4.2.2 Step 21.][Section 4.2.4 Step 6.][Section 4.2.4 Step 9.]R2.2.9 [Section 4.2.5 Step 3.]
   - R2.2.10 [Section 3.1 Note after Step 1]
   - R5 [Section 4.2.1 Step 1.D.]
   - R6 [Section 4.2.3 Step 1.][Section 4.2.4 Step 1.] [Section 4.2.1][Section 4.2.5 Step 1.]
2. IRO-014-4 Coordination Among Reliability Coordinators
3. R1 [Section 4.1][Section 4.2]
4. TOP-001-6 Transmission Operations
   - R2 [Section 4.1][Section 4.2]

6.2 FERC References

1. MISO Open Access Transmission, Energy, and Operating Reserve Markets Tariff, Section 40.2.20

6.3 MISO References

1. BPM-007 Physical Scheduling Business Practice Manual Section 16 – Capacity Resource Scheduling
2. SO-I-EOP-00-006 Interchange Scheduling Operations during Emergency Conditions
3. SO-I-AOP-00-224 CTS Failure Modes
4. SO-I-NOP-00-404 Emergency Demand Response Implementation
5. SO-I-NOP-00-441 Operations Real-Time Event Resolution
6. SO-I-NOP-00-448 Event Communications Matrix
7. SO-I-NOP-00-462 Inadvertent Interchange Management
8. SO-I-NOP-00-479 Purchasing and Selling Emergency Energy
9. SO-I-NOP-00-481 MISO-Manitoba Hydro Concurrent EEA
10. SO-I-NOP-00-483 Reliability Coordination Conference Call
11. SO-I-NOP-00-491 FRAC Handoff
12. SO-P-AOP-00-217 MISO and State Officials 24X7 Communication Protocols During Emergencies
13. SO-P-EOP-00-004 Transmission System Emergency
14. SO-P-EOP-11 MISO Emergency Operating Plan
15. SO-P-NOP-10-431 Communications Protocol For Operating Instructions
16. SO-P-NOP-00-449 Conservative System Operations
17. SO-P-NOP-00-455 Balancing Authority Operations
18. SO-P-NOP-04 MISO Event Reporting Operating Plan

Attachment 1 — Reserve Margin Example Calculations

1.0 Example 1: Projection for MBAA

Table 1: Calculation

Description	Value
MBAA Peak Load Forecast:	100,000
Operating Reserve Requirement:	2,410
Load plus Operating Reserve Requirement:	102,410
Available Economic Maximum in Area:	97,000
Constraint Stranded MW:	2,000
Available Economic Resources in Area:	95,000
Net Scheduled Interchange (NSI) into Area:	7,000
Reserve Margin = 95,000+7,000-102,410	- 410
Reserve Margin (%) = (590/102,410)*100:	- 0.4%

Assessment: Reserve Margin is forecasted to be -410 MW. Load plus Operating Reserve Requirement is not met and the Reserve Margin is less than 0 MW. A Max Gen Warning declaration may be necessary.

2.0 Example 2: Projection for South Region

Table 2: Calculation

Description	Value
MBAA Peak Load Forecast:	30,000
Operating Reserve Requirement:	1,500
Load plus Operating Reserve Requirement:	31,500
Available Economic Maximum in Area:	29,000
Constraint Stranded MW:	1,000
Available Economic Resources in Area:	28,000
Net Scheduled Interchange (NSI) into Area (RDT NSI):	400
RDT Import Capability up to RDTL of 3,000	3,000
Reserve Margin = 28,000+3,400-31,500	-100
Reserve Margin (%) = (-100/31,500)*100:	- 0.3%

Assessment: Reserve Margin is -100 MW, meaning the South Region Load plus Operating Reserve Requirement is 100 MW short of being met. This means Load will be covered but the 1,500 MW Operating Reserve Requirement will not be. A Max Gen Warning or Event declaration may be necessary.

Attachment 2 — Maximum Generation Declaration Template

Maximum Generation Declaration Type: [Warning/Event]

The MISO RC is Declaring/Updating a Maximum Generation Warning/Event effective from [MM/DD/YYYY] [HH:MM] EST and [MM/DD/YYYY] [HH:MM] EST for the following entities:

[List the affected entities within the boundaries of the declaration by LBA. Include any constrained pockets within the declaration area with adequate generation that should be excluded from the Maximum Generation Emergency.]

The reason for the declaration is:
State the reason(s): Forced Transmission Outage, Forced Generation Outage, Higher than Forecasted Load, Above/Below Normal Temperatures, Loss of Import Interchange Schedules, Reduction in RDT limit, etc.

Members are to prepare for a Maximum Generation Emergency by performing the applicable MISO Member Maximum Generation [Warning/Event] Level Actions of SO-P-EOP-002 MISO Market Capacity Emergency procedure.

CTS Suspension: Attention Market Participants: CTS (Coordinated Transaction Scheduling) is Suspended as of [MM/DD/YYYY] [HH:MM] EST. Alternative scheduling methods should be utilized.

Projections (to LBAs and TOPs only):

- Peak hour for Area is Hour Ending [MM/DD/YYYY] [HH:MM] EST.
- Load plus Operating Reserve Requirement for Area: _____
- Amount of available economic Resources in Area: _____
- Imports into Area: _____
- Reserve Margin shortfall(-)/surplus(+) for Area: _____

1. Summary information (only) at the top of the OI Message/template will be communicated to MPs via the following:
   A. OI
   B. MISO public web site – Real Time Notifications Tab via OI View Real-Time Operations Updates at https://www.misoenergy.org/markets-and-operations/notifications-overview/

2. Completed OI message/template (summary & projections) will be communicated to TOPs, LBAs, BAs and neighboring BAs, and RCs as follows:
   A. OI
   B. RCIS
3. MISO will provide summary information to the following email exploder lists via OI message:
   - *MISO Alerts BA and TO
   - *MISO Alerts FERC, State Comm., RRO, Neighboring RCs and BAs

Attachment 3 — Load Management Update Form Example

Local Balancing Authorities (LBAs) report via MCS or phone to the RC Load reductions that would be available, time permitting, via Load Management should a Maximum Generation Emergency Event be implemented during the same time frame the Warning is effective. MISO will provide the expected notification time* for LBAs to assume when completing form.

Load Management may include but are NOT limited to public appeals, voltage reduction, and interruption of end use Loads in accordance with applicable contracts, demand-side management, utility Load conservation measures, and starting behind the meter generation*.

Load Management is separated into LMM – Stage 1 and LMM – Stage 2.

*Excludes Registered DRR Type 1 and DRR Type 2 Resources

Table 3: LBAs report the following estimated values:

LBA:	
Notification time for Load Management Measures (i.e. less than 4 hours)	
LMM Stage 1 available:	10
LMM Stage 2 available:	5
Total:	15
LBAs should list LMM Stage 1 and LMM Stage 2 that are already or projected to be implemented at the Event time:	
LMM Stage 1:	100
LMM Stage 2:	0
Total:	100

Attachment 4 — Slice-of-System PPAs Load/Schedule Curtailment

1.0 Slice-of-System Power Purchase Agreements (PPAs) Curtailed Pro-Rata with Load in the Source Balancing Authority when Source Balancing Authority is in Emergency Procedures

1. PPAs in this category will continue to qualify as Planning Resources so long as the PPA only will be curtailed pro-rata along with Load in the source Balancing Authority and only when the source Balancing Authority is operating under Emergency Procedures.
2. Under this situation, a PPA with a 1,000 MW Export schedule from an external Balancing Authority with a 3,000 MW Load will be curtailed pro-rata along with the Load when the external Balancing Authority is operating under Emergency Procedures. That is, curtailment would take place three-quarters to firm Load and one quarter to the firm schedule. This pro-rata treatment is triggered when MISO experiences Emergency Conditions at the same time as the external Balancing Authority.

2.0 Slice-of-System PPA in a Balancing Authority that Coordinates Planning Reserve Qualifications and Shares Emergency Responsibilities with MISO's Balancing Authority

1. In addition to the slice-of-system PPA treatment noted in category (1.0) above, slice-of-system PPAs can continue to qualify as External Resources under this category, and MISO and the external BA will share Load Shedding on a pro-rata basis in proportion to the Load in the area under the Capacity Emergency, so long as the requirements of this category are met.
2. This qualification category has several requirements for the host BA:
   A. It must be in MISO's RC area.
   B. It must share Operating Reserves with the MISO BA.
   C. It must have a Seams Operating Agreement with MISO containing several features.
3. Seams Operating Agreement must specify the following:
   A. The host BA has established planning reserve processes and criteria similar to MISO's.
   B. Actions that will be taken by both entities – MISO and the host BA – during Emergency Procedures prior to implementing Load Shedding.
   C. BA responsibilities include:
      (1.) Submitting Load estimates to MISO in a similar manner as submitted by other Load entities under Module E-1.

(2.) Providing generator testing data for all resources used to serve firm requirements of the host Balancing Authority.

(3.) Providing transparency to such resource plans in the form of a Fixed Resource Adequacy Plan, pursuant to Module E-1.

4. With these requirements in place, when both BAs have exhausted other Emergency operating actions and are in a firm Load shedding event, Load shedding is shared on a pro-rata basis in proportion to the Load in the area under the Capacity Emergency.

Example 1

If the load of an external BA in Capacity Emergency is 3,000 MW and the Load of the area in MISO in Capacity Emergency is 17,000 MW, then pro-rata Load shed is 3/20 of the total for the external Balancing Authority and 17/20 for the area in MISO in the Capacity Emergency.

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5. This treatment is appropriate for BAs that meet the requirements indicated above because MISO can count on the fact that the external BA is planning and testing its resources in an equivalent manner to MISO, is part of MISO's RC area, and is subject to Emergency Procedures it has developed with MISO. It has also agreed to operate its system in a similar manner, including the agreement to share its Operating Reserves with MISO during Emergency Conditions.

3.0 When MISO is in an EEA and the external BA with PPA is not, then MISO will determine if the PPA should flow or determine the curtailable MWs of the PPA.

1. LBA NET (Excess Capability) =
   Σ(LBA_online RTmw - LBA_online MaxObligation)
   - Where RTmw = Current RT MWs of Resource
   - Where MaxObligation = The lesser of a resource's Effective ICAP (capacity obligation) and their Real-Time Must Offer availability
2. Prior to any curtailments, MISO will contact the external BA by phone.
3. If the BA indicates that the curtailment will cause the BA to enter an EEA, then MISO will initiate SO-I-NOP-00-481.
4. If the BA indicates that the curtailment will NOT cause the BA to enter an EEA, then MISO will curtail any relevant schedule(s).

Attachment 5 — Additional Information

1.0 Max Gen Emergency

1. MISO may call for a Max Gen Warning, Event, or EEA level prior to the actual forecasted start time of such Warning, Event, or EEA level.
   A. The purpose of this is to communicate forecasted conditions that meet the criteria of these levels, as well as to provide notice of certain implementation steps that require longer notifications times.
   B. An example would be an LMR which has a 4-hour notification time, requiring implementation instructions to be sent prior to the actual start time of the Event or EEA.
   C. Due to the dynamic nature of the Bulk Electric System (BES), these preliminary declarations and instructions may be canceled prior to the actual start time of the forecasted Warning, Event, or EEA as conditions warrant.
   D. At the Max Gen Warning level, Emergency Pricing - Tier I is in effect until termination of the Warning or increasing Max Gen level to Step 2 or higher.
2. Max Gen Warning
   A. EDRs may also be registered as LMRs in Module E. If a Market Participant (MP) has decided to offer all or part of their resource as an EDR for an operating day, the MP should reduce the availability of that resource as an LMR in the DSRI Tool for all 24 hours of the same operating day by the maximum MW amount offered for that resource as an EDR. In addition, if an MP has voluntarily implemented any resources registered as an LMR, the MP should adjust the availability of that resource in the DSRI Tool.
   B. Tier I prices are in effect from Max Gen Warning until an Emergency Event Step 2, when Tier II prices are implemented. This is an ex-post ELMP pricing change and does NOT affect system commitment or dispatch. Emergency Pricing will be utilized as necessary on an LBA basis.
3. Max Gen Event
   A. MISO will implement Emergency Pricing - Tier II during Step 2 of an Emergency Event. This is an ex-post ELMP pricing change and does NOT affect system commitment or dispatch. Emergency Pricing will be utilized as necessary on an LBA basis.

Attachment 6 — Maximum Generation Emergency Overview

The following is an overview of Max Gen Emergency actions and should be used for reference only during an actual event.

Table 4: Maximum Generation Emergency Overview

Level	MISO Major Actions	Stakeholder Major Actions
Capacity Advisory	Send OI Declaration message and RCIS notification	Prepare to implement this procedure and follow internal procedures for Emergency Conditions Update market data (availability, offers, constraints, load forecast values, etc.)
	Declare Conservative System Operations (if conditions warrant)	Follow instructions per Conservative System Operations procedure and declaration
	Determine if LMR Scheduling Instructions should be issued (in anticipation of Event Step 2 or higher) – send informational message and LMR Scheduling Instructions via MCS if needed	LBAs/MPs ensure accuracy of LMM/LMR availability and Self-Scheduled values in MCS/DSRI Tools
	Increase STR Default if System-Wide or STR MSSC if North/Central or South Region	Implement LMRs if notified by MISO
Warning	Implement Emergency Pricing - Tier I	LBAs/TOPs provide potential exclusion of constrained pockets within the declaration area
	Send LBAs LMM survey	Affected GOPs communicate capacity-limited facilities to MISO and update Limits/Offers
	Raise transfer capability or make Constraint Stranded MW from generation available	TOPs coordinate with MISO RC to identify potential reconfiguration options
	Request MPs/LBAs ensure accuracy of LMM/ LMR availability and Self-Scheduled values	LBAs/MPs ensure accuracy of LMM/LMR availability and Self-Scheduled values in MCS/ DSRI Tools

Table 4: Maximum Generation Emergency Overview

Level	MISO Major Actions	Stakeholder Major Actions
Warning	Determine EDR availability and MW amounts	MPs update EDR availability and MW amounts
	Obtain updated MW amounts of relief available via Load Management Form in MCS	LBAs update LMM availability via Load Management Form in MCS
	Review LMR availability using MCS-LMR Tool	MPs ensure LMR availability data is correct in the DSRI Tool
	Schedule available Module E Resources into the declaration area	MPs schedule available Module E Resources into the declaration area
	Suspend CTS	
	Curtail Export Schedules as required	
	Notify affected GOPs with Generators de-rated due to environmental restrictions to request waivers from appropriate government agencies	Affected GOPs request waivers from the appropriate government agencies for Generators de-rated due to environmental restrictions
	Evaluate options for returning Transmission and Generation services	
	Instruct TOPs to implement reconfiguration options	As directed by MISO RC, implement reconfiguration options
	Commit AME Resources and Declare Event Step 1/EEA 1	As directed by MISO, LBAs/GOPs/MPs start AME Resources
Event Step 1/EEA1	Implement Emergency Pricing – Tier I, if not already completed in the Warning step	
	Declare EEA1	
	Activate Emergency Maximum Limits	MPs review Offers and ensure all available Emergency Ranges and Resources are offered

Event Step 2/EEA2	Declare EEA2	
	Implement Emergency Pricing - Tier II	
	Instruct Load to be reduced via LMMs - Stage 1 and LMRs	As directed by MISO, LBAs reduce Load via LMM - Stage 1
	Implement LMRs	MPs implement LMRs via DSRI Tool
	Commit EDR Resources	As directed by MISO, MPs commit EDRs
	Implement Emergency Energy purchases	
	Instruct LBAs to issue Public Appeals	LBAs issue public appeals to reduce demand per internal procedures and OE-417 filings
		LBAs in defined Event area shall prepare to shed Load
	Notify affected GOPs with de-rated Generators to implement waivers for dispatch	Affected GOPs implement waivers to dispatch de-rated Generators
	Implement Emergency Energy purchases from neighboring BAs (Operating Reserves)	
	Instruct Load to be reduced via LMMs – Stage 2	Affected LBAs reduce Load via LMM – Stage 2
	Implement spinning and supplemental reserves	
	Implement Reserve Call from CRSG	

Table 4: Maximum Generation Emergency Overview

Level	MISO Major Actions	Stakeholder Major Actions
Event Step 3/EEA3	Declare EEA3	
	Issue Emergency Operating Instruction to shed Load if Contingency Reserves are depleted or to recover ACE from loss of Generation	LBAs shed Load per MISO instructions and confirm action via MCS Firm Load Shed Tool
	Set LMPs and MCPs to the VOLL	LBAs review OE-417 filing requirements

Attachment 7 — UDS Operator Actions During a MISO Market Capacity Emergency

- If a North/Central declaration is in place and a South declaration is subsequently implemented, Increase STR Default Values.

SO-P-EOP-00-002 MISO Market Capacity Emergency - UDS Operator Actions								
		Increase STR RPE MSSC Default Values for **Zone 8** (South) if not done in previous declaration*	Increase STR RPE Default Values for **Non-Zone** (N/C) if not done in previous declaration*	Increase STR Default Values for System Current (**System-Wide**) if not done in previous declaration*	Implement Emergency Pricing **Tier I**	Activate **Emergency Limits**	Implement Emergency Pricing **Tier II**	Check **Is VOLL Price Enforced** in EMD
System-Wide Declaration Level	Capacity **Advisory**	■	■	■				
	Max Gen **Warning**	■	■	■	■			
	Max Gen **Event Step 1**	■	■	■	■	■		
	Max Gen **Event Step 2**	■	■	■		■	■	
	Max Gen **Event Step 3**	■	■	■		■	■	■
North/Central Declaration Level	Capacity **Advisory**		■					
	Max Gen **Warning**		■		■			
	Max Gen **Event Step 1**		■		■	■		
	Max Gen **Event Step 2**		■			■	■	
	Max Gen **Event Step 3**		■			■	■	■
South Declaration Level	Capacity **Advisory**	■						
	Max Gen **Warning**	■			■			
	Max Gen **Event Step 1**	■			■	■		
	Max Gen **Event Step 2**	■				■	■	
	Max Gen **Event Step 3**	■				■	■	■
Single Region (North or Central) Declaration Level	Capacity **Advisory**							
	Max Gen **Warning**				■			
	Max Gen **Event Step 1**				■	■		
	Max Gen **Event Step 2**					■	■	
	Max Gen **Event Step 3**					■	■	■

Figure 1: UDS Operator Actions During a MISO Market Capacity Emergency

Attachment 8 — Summary of Market Capacity Emergency Procedure Steps

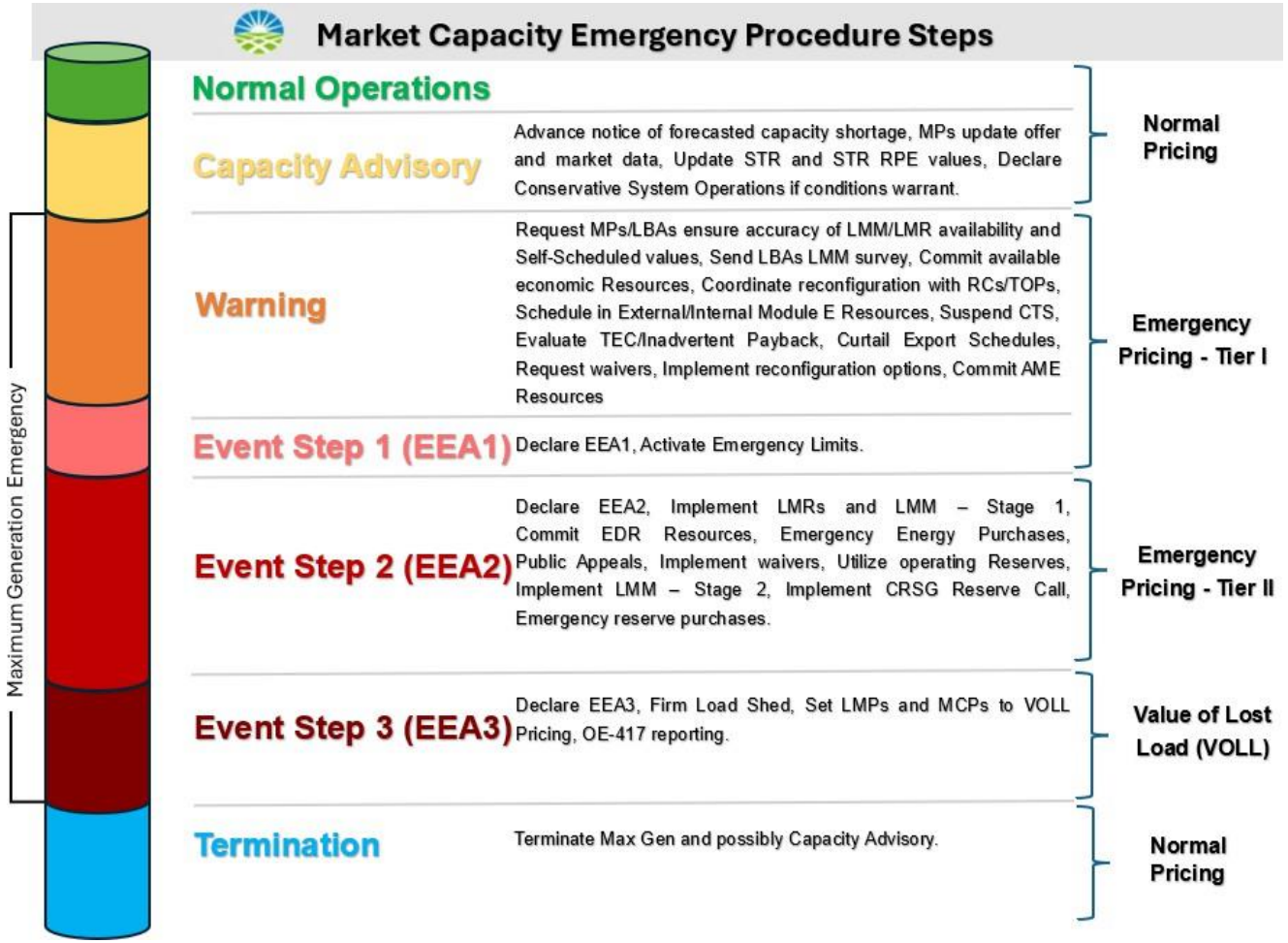


Figure 2: Market Capacity Emergency Procedure Steps

Attachment 9 — Market Capacity Emergency Checklist – MISO Actions

MCE CHECKLIST - MISO ACTIONS

4.1.1 Capacity Advisory

☐ Start_____End_____SM – **COMMUNICATE** Capacity Advisory declaration area boundaries, start time, and end time to MISO members via OI and RCIS. I**NFORM** UDS Operator for STR Default and RPE MSSC Overrides.

☐ Start_____ End_____ SM – **DECLARE** Conservative Operations if conditions warrant and not already declared.

☐ Start_____ End_____ SM – If a significant shortage of Operating Reserves is anticipated in any RAC process, THEN **DETERMINE** whether to issue LMR Scheduling Instructions in anticipation of a Max Gen Event Step 2.

☐ Start_____ End_____ UDS – **UPDATE** STR Default and/or RPE MSSC Overrides based on Capacity Advisory Region(s).

☐ Start_____ End_____ SM/ORA – **NOTIFY** DA and FRAC Operators when STR Default or RPE MSSC Overrides are updated.

4.2.2 Max Gen Warning

☐ Start_____End_____SM – **COMMUNICATE** Max Gen Warning declaration area boundaries, start time, and end time to MISO members via OI and RCIS.

☐ Start_____ End_____ UDS – **IMPLEMENT** Emergency Pricing - Tier I.

☐ Start_____ End_____ SM – **SEND** survey via MCS LMM Tool in the Load Management Tab to LBAs.

☐ Start_____ End_____ G&I – **COORDINATE** with MPs that have Module E Resources.

☐ Start_____ End_____ RC – **COORDINATE** with neighboring RCs and MISO TOPs to **RAISE** transfer capability into declaration area, make available Constraint Stranded MW from generation, review TLR activity, binding constraints, reconfiguration options, and use of short-term ratings.

☐ Start_____ End_____ SM – **REVIEW** EDR offers to determine EDR availability and MW amounts during the Warning period.

☐ Start_____ End_____ SM – **OBTAIN** updated LMM Stage 1 & 2 MW amounts of relief available during the effective Warning period by LBA from MCS.

☐ Start_____ End_____ SM – **REVIEW** LMR availability in MCS-LMR Tool for the declaration period.

☐ Start_____ End_____ SM/BAO – SM **DIRECT** BAO to **TERMINATE** Inadvertent Payback and Time Error Correction if required to assist system conditions.

☐ Start_____End_____SM – **SEND** OI message to MPs to **SCHEDULE** remaining available External and Internal Module E Registered Capacity Resources that would be deliverable to the Warning area.

☐ Start_____ End_____ SM/GI – **COORDINATE** to notify MPs to **SCHEDULE** Module E Resources into the MBAA declaration area.

☐ Start_____ End_____ G&I – **NOTIFY** SM of forecasted changes in MBAA NSI due to loss of imports.

☐ Start_____ End_____ G&I – **MODIFY** webTrans E-tag validation mode to reflect Max Gen in the affected area per SO-I-EOP-00-006 Interchange Scheduling Operations during Emergency Conditions.

☐ Start_____ End_____ G&I – **COORDINATE** to determine the amount of non-firm and firm Export Schedules to curtail per SO-I-EOP-00-006 Interchange Scheduling Operations during Emergency Conditions.

☐ Start_____ End_____ G&I – **CURTAIL** Export Schedules from the declaration area in amounts required to relieve shortage conditions.

☐ Start_____ End_____ SM – **NOTIFY** GOPs via OI in the declaration area with Generators de-rated due to environmental restrictions to **REQUEST** waivers from appropriate government agencies if forecasts show probable escalation to Max Gen Event Step 2.

☐ Start_____ End_____ RC – **NOTIFY** TOPs to **IMPLEMENT** reconfiguration options agreed upon to raise transfer capability into the declaration area or make available constraint stranded MW from generation.

☐ Start_____ End_____ G&I – **SUSPEND** Coordinated Transaction Scheduling (CTS) for the duration of the Capacity Emergency per SO-I-AOP-00-224 CTS Failure Modes.

☐ Start_____ End_____ SM/IRAC – **COMMIT** AME designated resources AND **DECLARE** Max Gen Event Step 1 and EEA1.

4.2.3 Max Gen Event Step 1/EEA1

☐ Start_____ End_____ SM – **COMMUNICATE** Max Gen Event Step 1/EEA1 declaration area boundaries, start time, and end time to MISO members via OI and RCIS.

☐ Start_____ End_____ SM – **NOTIFY** Director On-Call to implement SO-P-AOP-00-217 MISO and State Officials 24x7 Communication Protocols During Emergencies.

☐ Start_____ End_____ UDS – **IMPLEMENT** Emergency Pricing - Tier I in EMD, if not already implemented.

☐ Start_____ End_____ IRAC – **ENSURE** Emergency Ranges are pushed in EMD.

☐ Start_____ End_____ UDS – **ACTIVATE** Emergency Maximum Limits in EMD , excluding units providing Regulation.

☐ Start_____ End_____ SM – If increasing load forecasts continue to result in negative Reserve Margin after all resources are committed and dispatched into Emergency Ranges, THEN **PREPARE** to move to Max Gen Event Step 2 and EEA2.

4.2.4 Max Gen Event Step 2/EEA2

☐ Start_____ End_____ SM – **COMMUNICATE** Max Gen Event Step 2/EEA2 declaration area boundaries, start time, and end time to MISO members via OI and RCIS.

☐ Start_____ End_____ UDS – **IMPLEMENT** Emergency Pricing - Tier II in EMD.

☐ Start_____ End_____ SM – If Manitoba Hydro (MHEB) is in an EEA concurrently with MISO's EEA2 or higher, THEN **PERFORM** SO-I-NOP-00-481 MISO-Manitoba Hydro Concurrent EEA.

☐ Start_____ End_____ SM – **NOTIFY** LBAs of required Load reduction via LMM – Stage 1 and LMRs in MW amounts via MCS.

☐ Start_____ End_____ SM – **COORDINATE** with MPs on implementing LMRs.

☐ Start_____ End_____ SM – **DETERMINE** OE-417 reporting responsibilities per SO-P-NOP-04 MISO Event Reporting Operations Plan.

☐ Start_____ End_____ SM – **ENSURE** required notifications are performed per SO-I-NOP-00-448 Event Communications Matrix.

☐ Start_____ End_____ SM – **COMMIT** EDR resources, in merit order, to alleviate capacity shortages within the declaration area per SO-I-NOP-00-404 Emergency Demand Response Implementation.

☐ Start_____ End_____ SM – **COORDINATE** with neighboring RCs and BAs to determine Emergency Energy available from external sources, either through interruptible firm Load or through Emergency Energy purchases.

☐ Start_____ End_____ SM/G&I – **IMPLEMENT** Emergency Energy purchases from neighboring BAs to conserve Operating Reserves per SO-I-NOP-00-479 Purchasing and Selling Emergency Energy.

☐ Start_____ End_____ SM – **EVALUATE** opportunities to reduce internal energy usage, such as sending non-essential personnel home, reducing lighting that is non-essential for personnel safety, and reducing large electrical Loads.

☐ Start_____ End_____ SM – **INSTRUCT** LBAs in the declaration area to **ISSUE** public appeals to reduce demand per their internal procedures.

☐ Start_____ End_____ SM – **NOTIFY** GOPs via OI in the declaration area with Generators de-rated due to environmental restrictions to implement waivers from the appropriate government agencies.

☐ Start_____ End_____ SM – **NOTIFY** LBAs, via MCS, of required Load reduction via LMM - Stage 2 in MW of interruptible demands.

☐ Start_____ End_____ RC – **COORDINATE** with neighboring RCs and BAs to identify additional available Emergency Energy, including their Operating Reserves.

☐ Start_____ End_____ G&I – SM/G&I – **IMPLEMENT** Emergency Energy purchases of neighboring BAs Operating Reserves if available.

☐ Start_____ End_____ BAO – **IMPLEMENT** the use of MISO's Spinning and Supplemental Reserves, as needed and as time permits.

☐ Start_____ End_____ SM – If Contingency Reserves fall below MSSC for greater than 30 minutes and NO reasonable actions exist to restore them in 90 minutes, THEN **DECLARE** EEA3.

☐ Start_____ End_____ BAO – **IMPLEMENT** a Reserve Call from Contingency Reserve Sharing Group (CRSG), utilizing MHEB's available Contingency Reserves.

☐ Start_____ End_____ SM/IRAC – **EVALUATE** excluding Regulating Units that have room between Reg Max and Emergency Max from clearing Regulation, while **ENSURING** enough Regulating Reserve is available to avoid firm Load shed for normal ACE deviations.

4.2.5 Max Gen Event Step 3/EEA3

☐ Start_____ End_____ SM - **COMMUNICATE** Max Gen Event Step 3/EEA3 declaration area boundaries, start time and end time to MISO members via OI and RCIS.

☐ Start_____ End_____ SM – **DETERMINE** manual Load Shedding requirements based on increasing Load or potential loss of MSSC and ability to recover ACE. **ENSURE** Load Shed points are known and members are prepared to execute Load Shed when Contingency Reserves are depleted and Load continues to increase or ACE recovery from generation loss is only possible through Load Shed.

☐ Start_____ End_____ SM – **ISSUE** Emergency Operating Instructions to LBAs in the declaration area for MW amounts of Load to shed via the MCS Firm Load Shed Tool or verbally per SO-P-NOP-10-431 Communications Protocol for Operating Instructions.

☐ Start_____ End_____ UDS – When notified by SM, in the EMD UDS tab, **CHECK** the appropriate box(es) in the column titled “Is Voll Price Enforce” for the applicable LBAs. **SAVE** updates.

☐ Start_____ End _____ SM – If firm Load Shed is greater than 100MW, THEN **DETERMINE** OE-417 reporting responsibilities per SO-P-NOP-04 MISO Event Reporting Operations Plan.

☐ Start_____ End_____ SM – **ENSURE** required notifications are performed per SO-I-NOP-00-448 Event Communications Matrix.

4.2.6 Max Gen Event Downgrade/Termination

☐ Start_____ End_____ SM – When actual obligations return below total MISO capability, then Downgrade/Terminate Max Gen Event by reversing the order of entry into each step.

Attachment 10 — Market Capacity Emergency Checklist – Member Actions

MCE CHECKLIST - MEMBER ACTIONS

4.1.2 Capacity Advisory

☐ Start_____ End_____ LBA/TOP/GOP/MP - WHEN notified by MISO, THEN **ENSURE** all market data is updated with the best available information for the operating day(s).

- Facility and generation availability, outages, and de-rates
- Generation Offers, including any changes to reflect fuel availability
- Fuel supply and inventory concerns
- Fuel switching capabilities
- Environmental constraints
- Load forecast Values
- LMR Availability in the DSRI Tool
- Voluntary Load Management information
- Load Management Measures (LMM) and any Voluntary Load Management in the MCS
- Emergency Demand Response (EDR) offers

☐ Start_____ End_____ MP - IF notified by MISO, THEN **IMPLEMENT** LMRs.

☐ Start_____ End_____ LBA/TOP/GOP – **FOLLOW** MISO's SO-P-NOP-00-449 Conservative System Operations procedure, if declared.

4.3.1 Max Gen Warning

☐ Start_____ End_____ LBA/TOP – **DETERMINE** potential exclusions of constrained pockets within the declaration area where there is expected to be adequate generation that may NOT be transferred to other parts of the declaration area due to local constraints.

☐ Start_____ End_____ TOP – **INFORM** MISO RC of identified constrained areas from previous step.

☐ Start_____ End_____ GOP – If generators are de-rated, then **INFORM** LBAs, TOPs, and the MISO G&I Operator of capacity-limited facilities.

☐ Start_____ End_____ MP – **ENSURE** accuracy of LMR availability and Self-Scheduled/Voluntary Load Management LMRs in the DSRI Tool.

☐ Start_____ End_____ LBA – **ENSURE** accuracy of Non-LMR Voluntary Load Management/ Self-Scheduled LMM information in the MCS-LMR Tool.

☐ Start_____ End_____ TOP – **COORDINATE** with the MISO RC to determine reconfiguration options to raise transfer capability to declaration area or make available Constraint Stranded MW from generation in the declaration area.

☐ Start_____ End_____ LBA – Based on Load Shed methodology, **PREPARE** for potential Load Shed during an Event stage.

☐ Start_____ End_____ MP – **UPDATE** EDR offers for availability and MW amounts for the declaration period.

☐ Start_____ End_____ LBA – **SUBMIT** LMM availability via MCS per Attachment 3 — Load Management Update Form Example.

☐ Start_____End_____MP – **ENSURE** accuracy of registered LMR availability in the DSRI Tool.

☐ Start_____ End_____ MP – **SCHEDULE** remaining available External and Internal Resources (Module E Registered Capacity Resources) that are deliverable to the declaration area.

☐ Start_____ End_____ LBA – **NOTIFY** Interruptible Loads of potential interruption.

☐ Start_____ End_____ GOP – **REQUEST** waivers for de-rated Generators from government agencies as directed by MISO.

☐ Start_____ End_____ TOP – **IMPLEMENT** agreed upon reconfiguration options to raise transfer capability into the declaration area or make available Constraint Stranded MW from generation in the declaration area.

☐ Start_____ End_____ GOP – WHEN notified by MISO, THEN **START** applicable off-line AME Generation Resources.

4.3.2 Max Gen Event Step 1/EEA1

☐ Start_____ End_____ GOP – WHEN Resources are dispatched, THEN **ENSURE** Resources move into Emergency Ranges.

☐ Start_____ End_____ GOP – **ENSURE** all co-generation and independent power producers are at maximum output and availability.

☐ Start_____ End_____ GOP – IF additional reliable capacity is available (such as adding additional mills, duct burners, etc.), THEN **COORDINATE** adjustments with the MISO G&I Operator

.

4.3.3 Max Gen Event Step 2/EEA2

☐ Start_____ End_____ LBA – IF in the declaration area and notified by MISO to reduce Load via LMM – Stage 1, THEN **REDUCE** load via LMM – Stage 1. WHEN Load reduction actions have been implemented, THEN **NOTIFY** MISO.

☐ Start_____ End_____ MP – WHEN notified by MISO, THEN **IMPLEMENT** LMRs.

☐ Start_____ End_____ MP – WHEN notified by MISO, THEN **COMMIT** EDR Resources.

☐ Start_____ End_____ LBA – WHEN instructed by MISO, THEN **ISSUE** public appeals to reduce demand per internal procedures.

☐ Start_____ End_____ LBA – **EVALUATE** opportunities to reduce internal energy usage, such as sending non-essential personnel home, reducing lighting that is non-essential for personnel safety, and reducing large electrical Loads.

☐ Start_____ End_____ LBA – IF in the declaration area, THEN **PREPARE** to shed load.

☐ Start_____ End_____ GOP – IF requested by MISO to dispatch available capacity, THEN **VERIFY** Generators in the declaration area with de-rates from environmental restrictions AND IF approved waiver from government regulations, THEN **DISPATCH** available generation.

☐ Start_____ End_____ LBA – IF in the declaration area and notified by MISO to reduce Load via LMM – Stage 2, THEN **REDUCE** Load via LMM – Stage 2. WHEN Load reduction actions have been implemented, THEN **NOTIFY** MISO via MCS.

☐ Start_____ End_____ GOP/MP – **REVIEW** Offers, **ENSURE** all available Emergency Ranges and Resources are offered. IF there are available Resources or capacity NOT being utilized, THEN **NOTIFY** the MISO G&I Operator.

4.3.4 Max Gen Event Step 3/EEA3

☐ Start_____ End_____ LBA – **SHED** firm Loads per MISO issued Emergency Operating Instruction.

☐ Start_____ End_____ LBA – **CONFIRM** actions taken with the MISO RC via the MCS Firm Load Shed Tool or verbally per SO-P-NOP-10-431 Communications Protocol for Operating Instructions.

☐ Start_____ End_____ LBA – IF requested by MISO during Event Step 3, THEN **COMPLETE** Department of Energy (DOE) Form OE-417.

4.3.5 Max Gen Event Downgrade/Termination

☐ Start_____ End_____ LBA/MP/TOP/GOP – **PERFORM** requests of MISO SM or designee to back out of each level.

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 206
MISO Seasonal Readiness Workshop Summer 2026



MISO

Seasonal Readiness Workshop: Summer 2026

May 6, 2026

Agenda

1. **Welcome** – JT Smith, Executive Director, MISO System Operations
2. **Seasonal Assessments**
   - Weather – Adam Simkowski/Ella Dankanics, MISO Meteorologists
   - Generation – Andy Taylor, Manager, MISO Resource Adequacy
   - Transmission – Fisseha Zewdu, Sr. Engineer, MISO Operations Planning
3. **Seasonal Risk / Uncertainty Management** – Matt Campbell, Manager, Operations Risk Assessment
4. **Emergency Procedure & Technical Training Updates**
   - Capacity Emergency Changes – Don Hunter, Manager, MISO Control Room Operations
   - 202(c) Emergency Orders – Don Hunter, Manager, MISO Control Room Operations
   - Transmission System Emergency Procedure Updates– Clayton Umlor, Manager, MISO Reliability Coordination
   - Technical Development – Anita Hurst, Sr. Manager, MISO Technical Development
5. **Q&A**

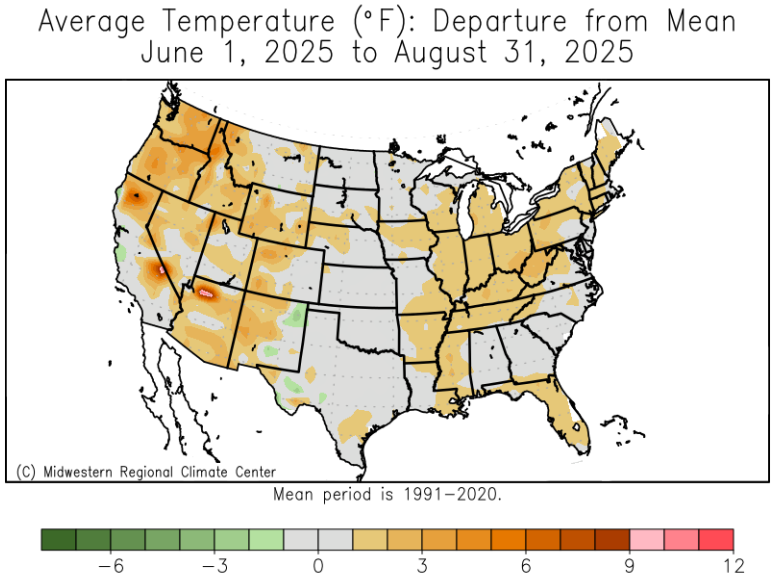


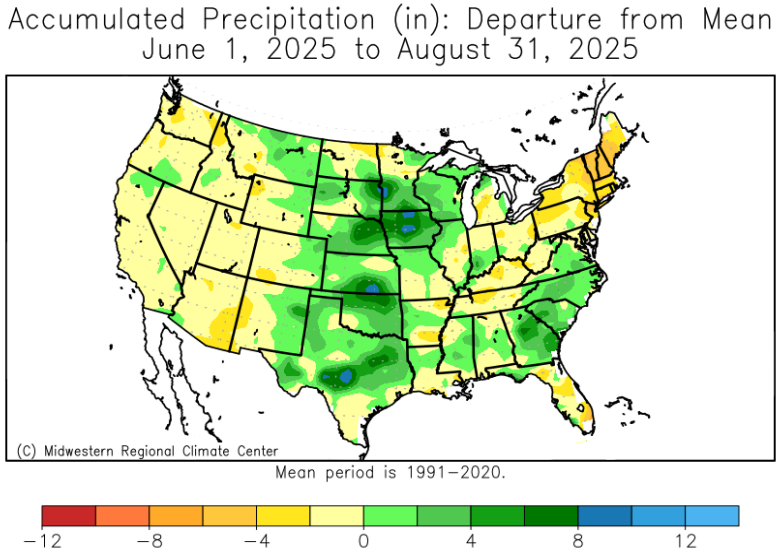
Seasonal Assessment: Weather

Adam Simkowski and Ella Dankanics, MISO Meteorologists

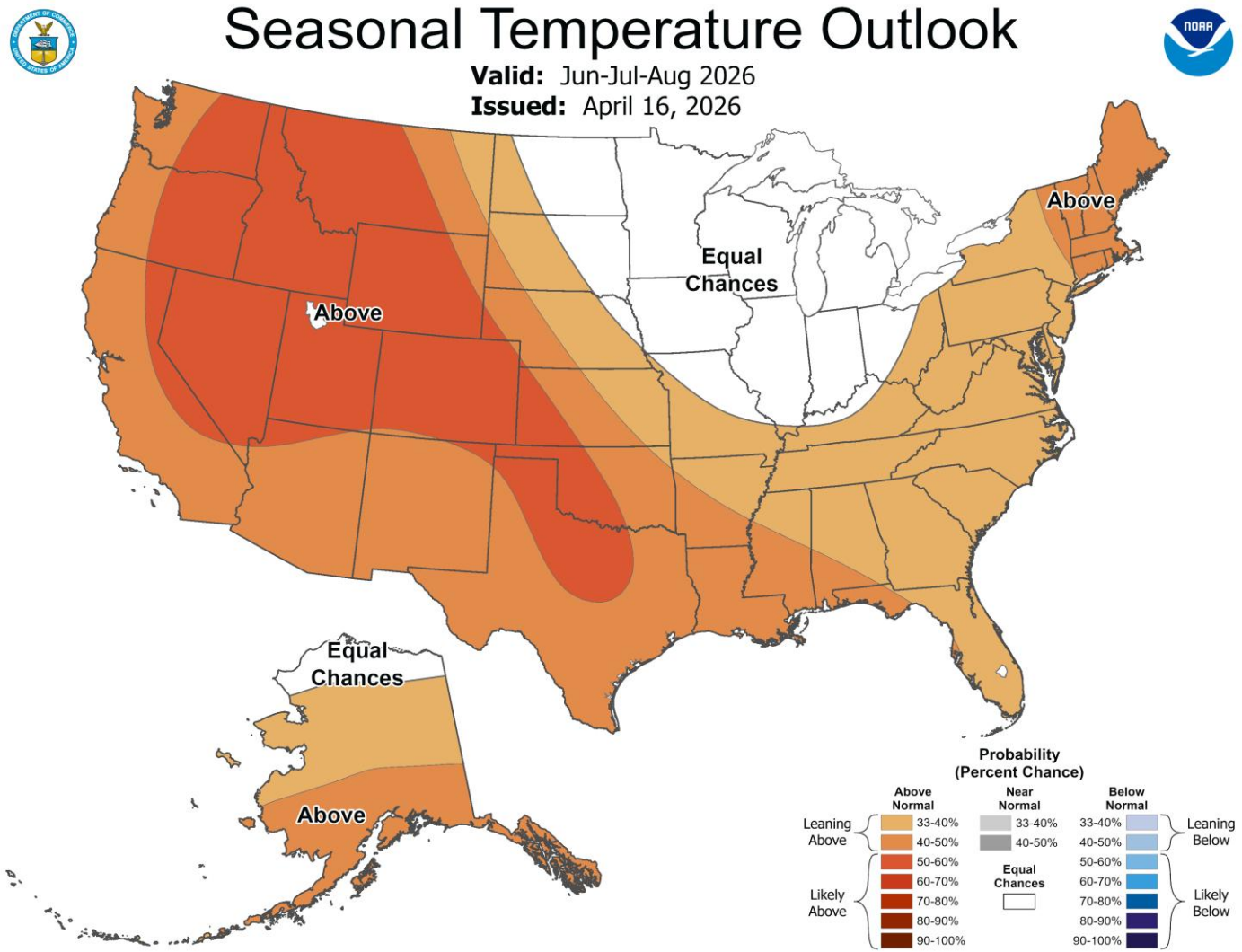
Despite Above Normal Precipitation, La Niña Drove Above Normal Temperatures Across MISO's Footprint

- Last summer, we experienced:
- Above normal temperatures across the North/Central Region
- Slightly above normal temperatures in the South Region
- There were 6 days recorded above 90°F Systemwide temperature
- Near to slightly above normal precipitation was observed across much of the MISO footprint

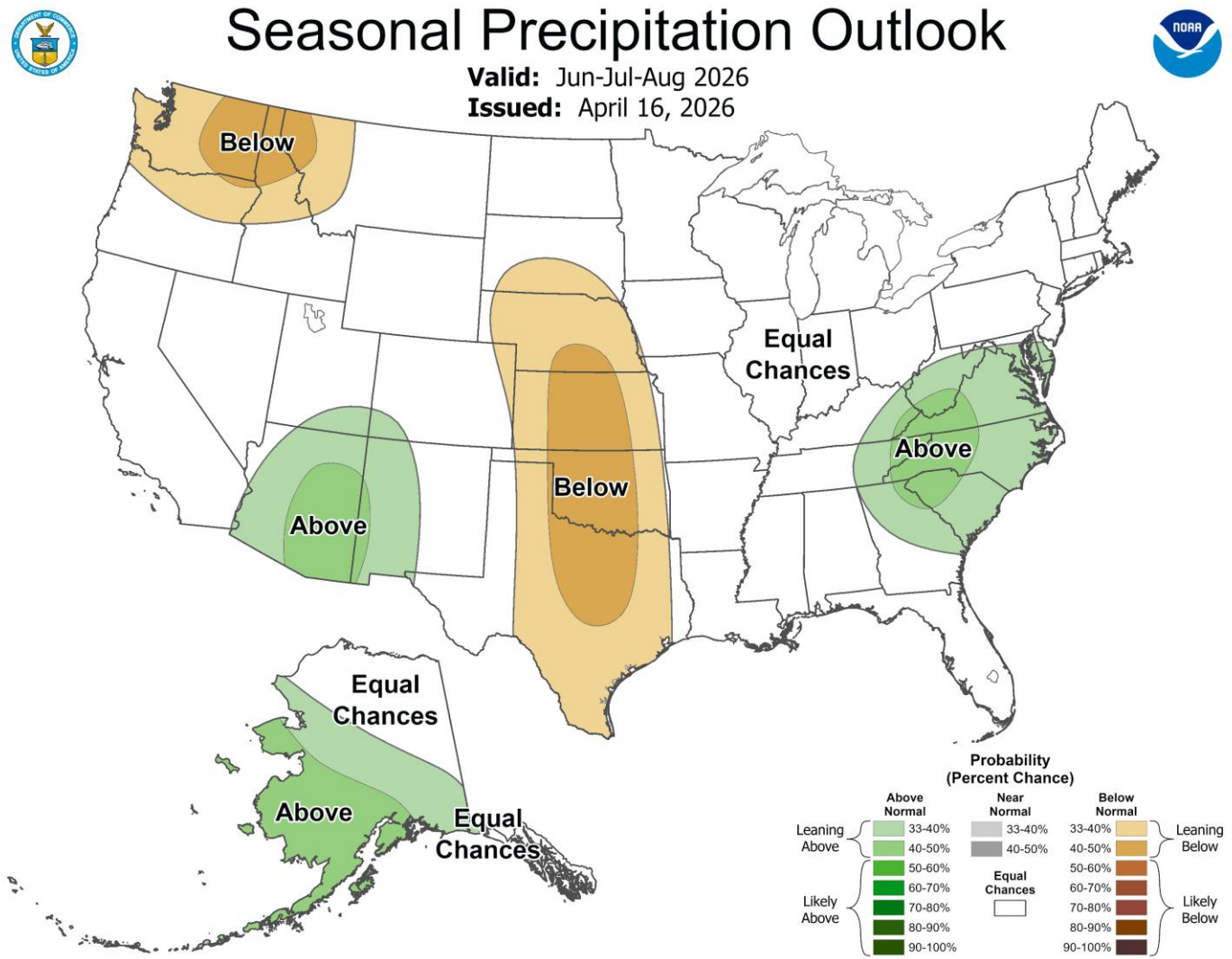




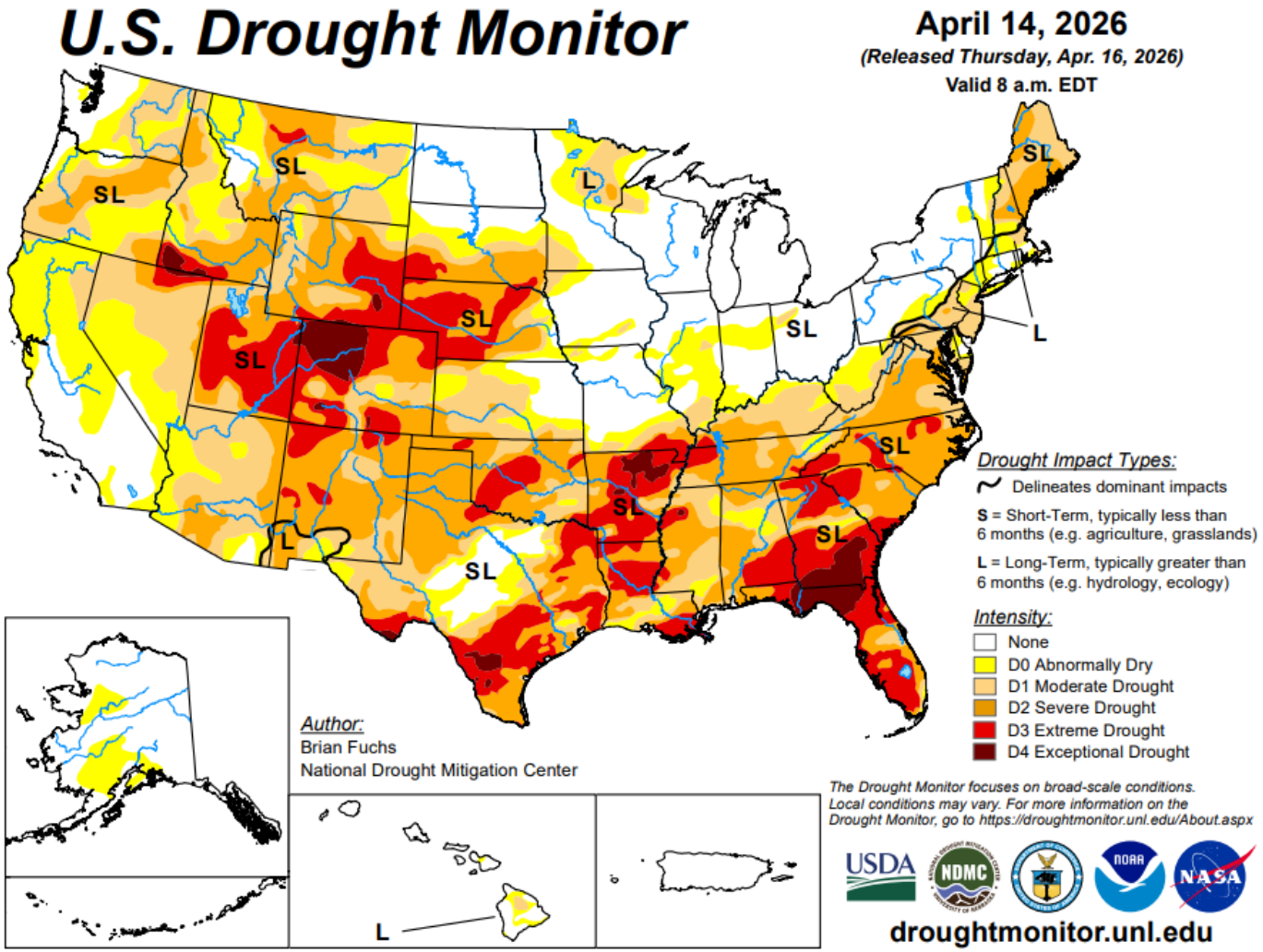
NOAA is forecasting above normal temperatures for June through August in MISO's South Region with near normal temperatures across MISO's North/Central Region holding the core of the heat in the intermountain West



NOAA anticipates normal precipitation rates across the majority of MISO's footprint



US drought conditions will need to be monitored as pervasive drought can exacerbate heat concerns over MISO footprint



Circled years are the best historical analog (reference) years to this upcoming summer

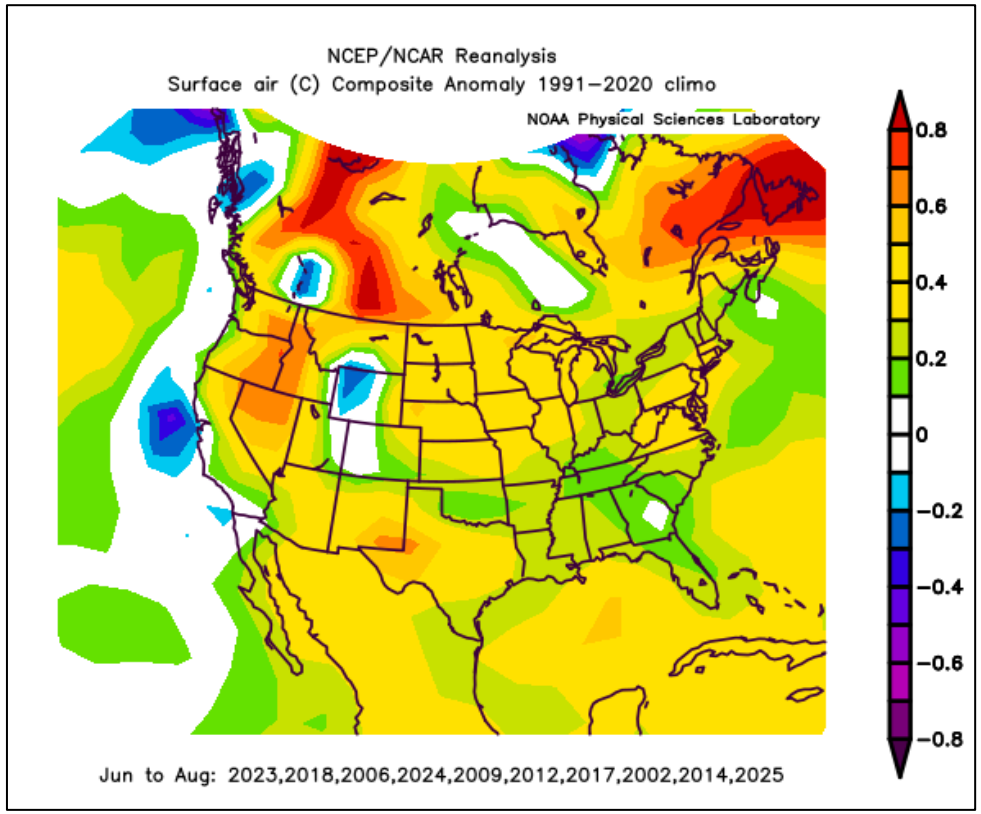
Analog years for Summer 2026

Year(s)	Vendor A	Vendor A Rank	Vendor B	Vendor B Rank
	2023	1	2015	1
	2018	2	2023	2
	2006	3	2009	3
	2024	4	1951	4
	2009	5	1997	5
	2012	6	2006	6
	2017	7	2002	7
	2002	8	1963	8
	2014	9	2012	9
	2025	10	1991	10

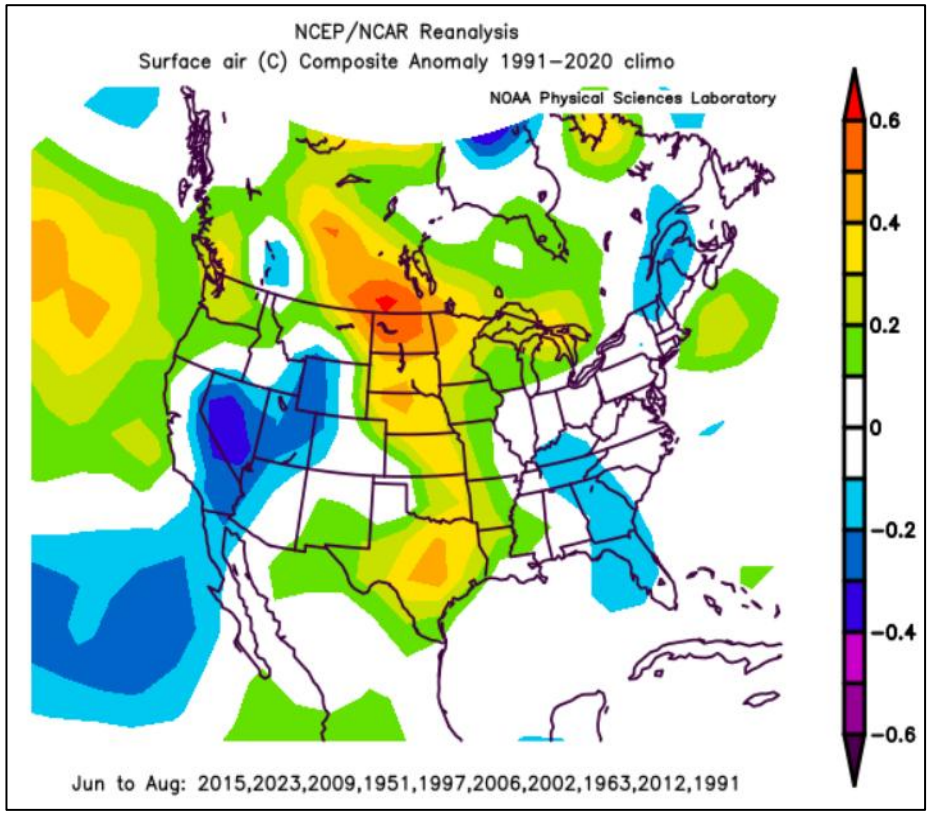
Cool MISO Summer
Warm MISO Summer
Normal MISO Summer

While both vendors' analog year selections favor heat across MISO's footprint, their selections were created in late winter with more El Niño uncertainty. With high certainty of El Niño now, top analog years are under-weighted in the images below.

Vendor A

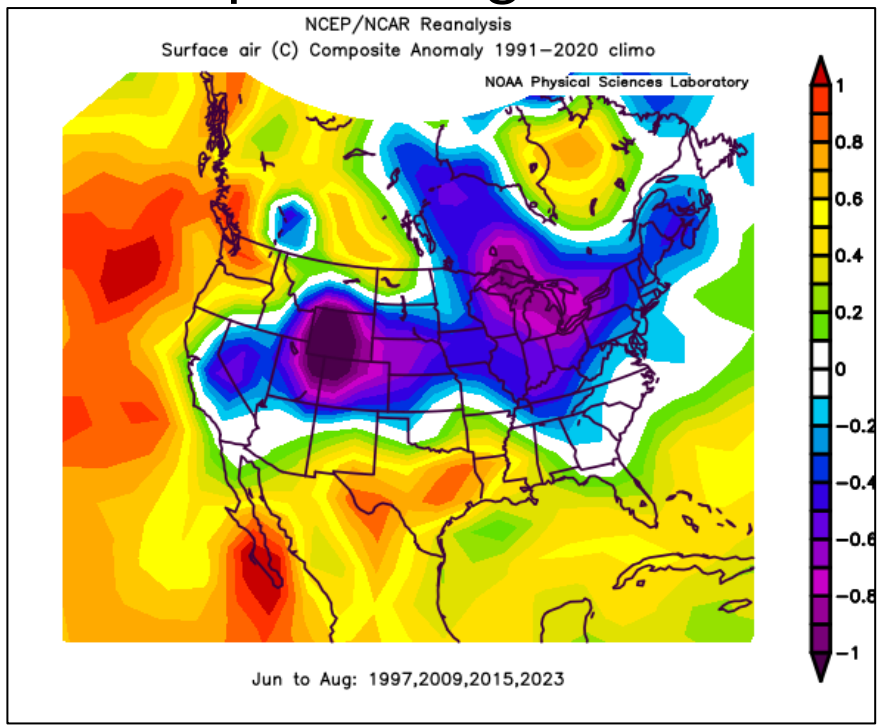


Vendor B



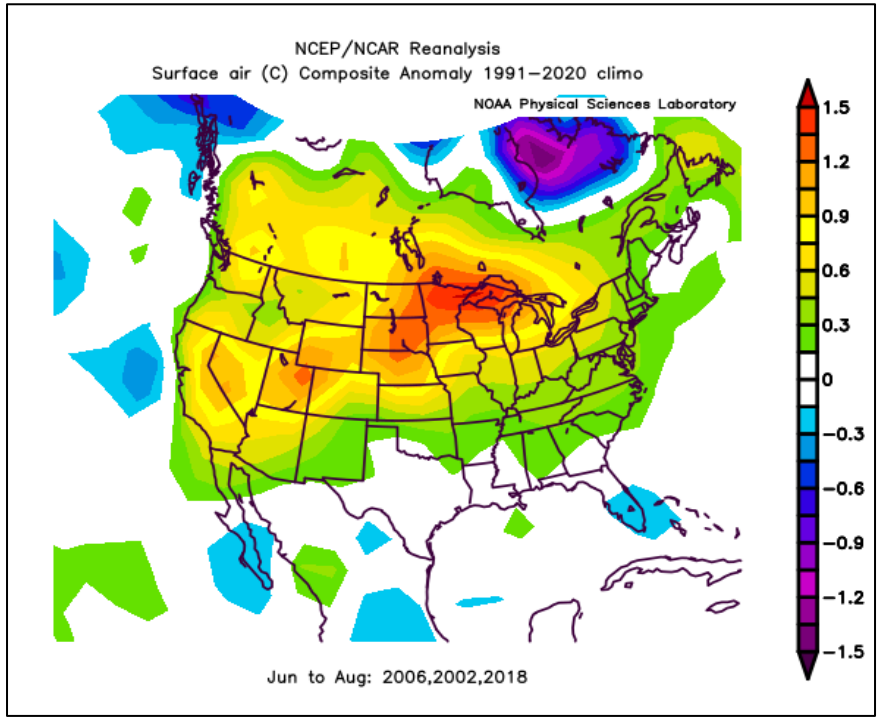
MISO's analysis of historical analog years from each vendor support a cooler to average summer for MISO's North/Central Region, but there is a higher likelihood for above normal temperatures in MISO's South Region

Top 4 Analog Years



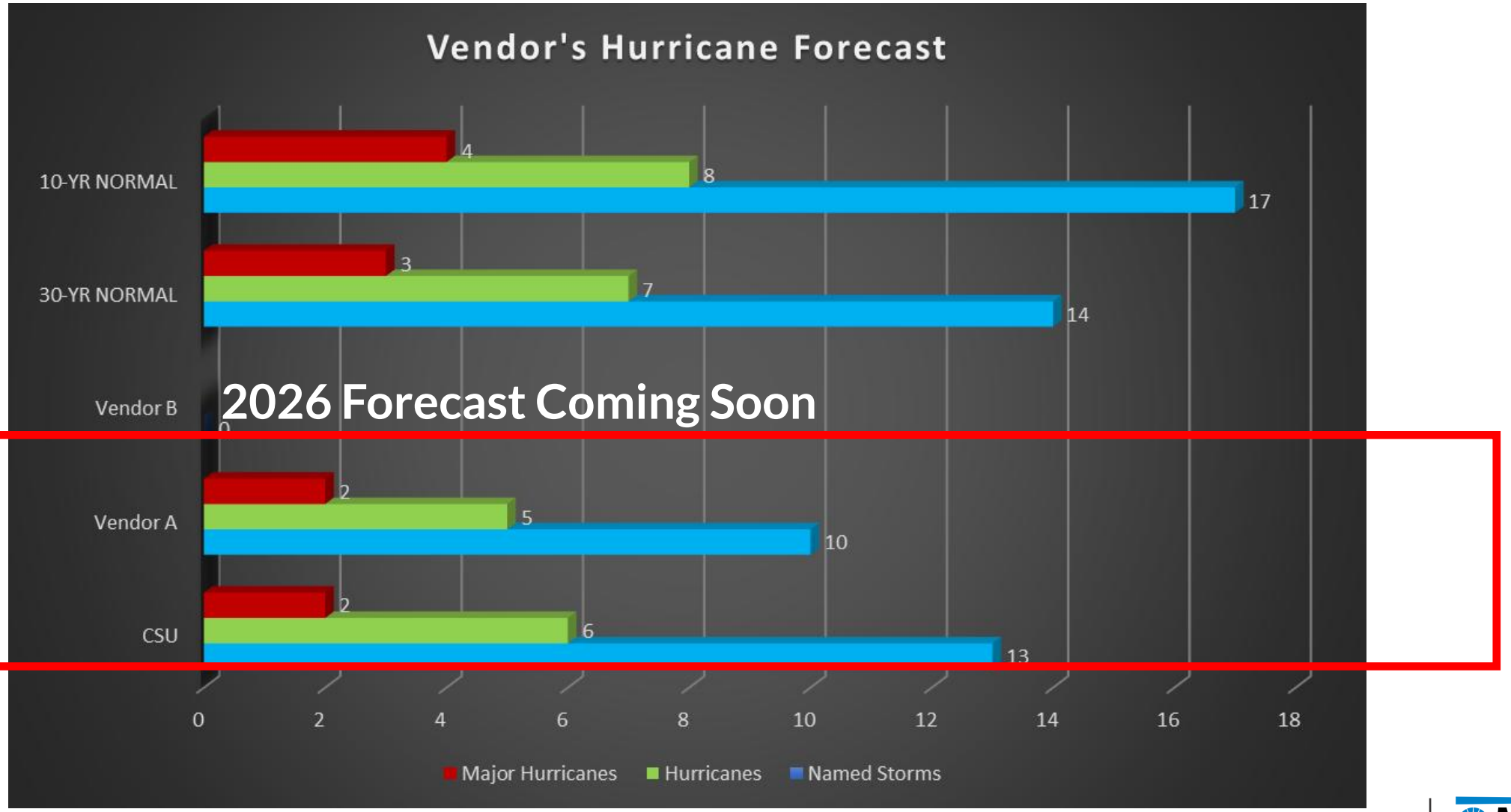
- More likely scenario
- Good agreement with vendors forecast on TX/LA heat

Top 3 Warm Analog Years

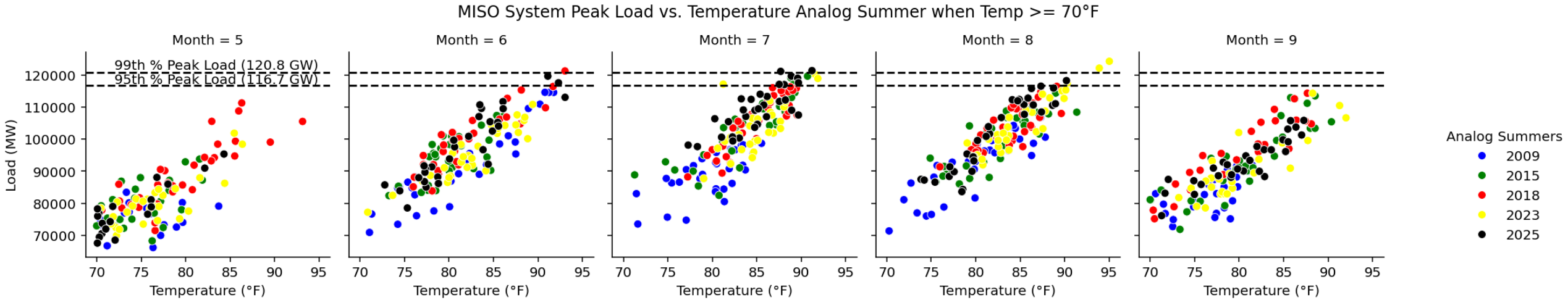


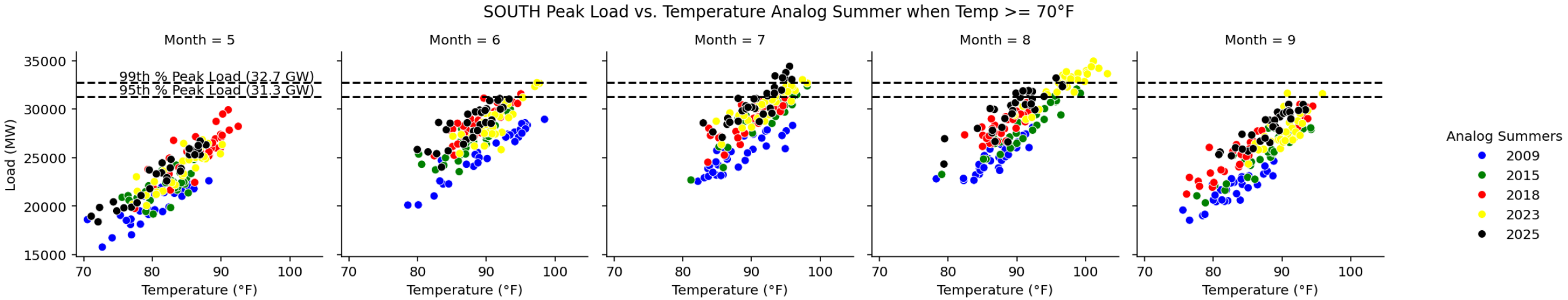
- Less likely scenario
- Heat extends from the intermountain west to MISO North/Central Region

A slightly below normal hurricane season is expected from all vendors; threats to MISO are best evaluated in a two-week forecast window



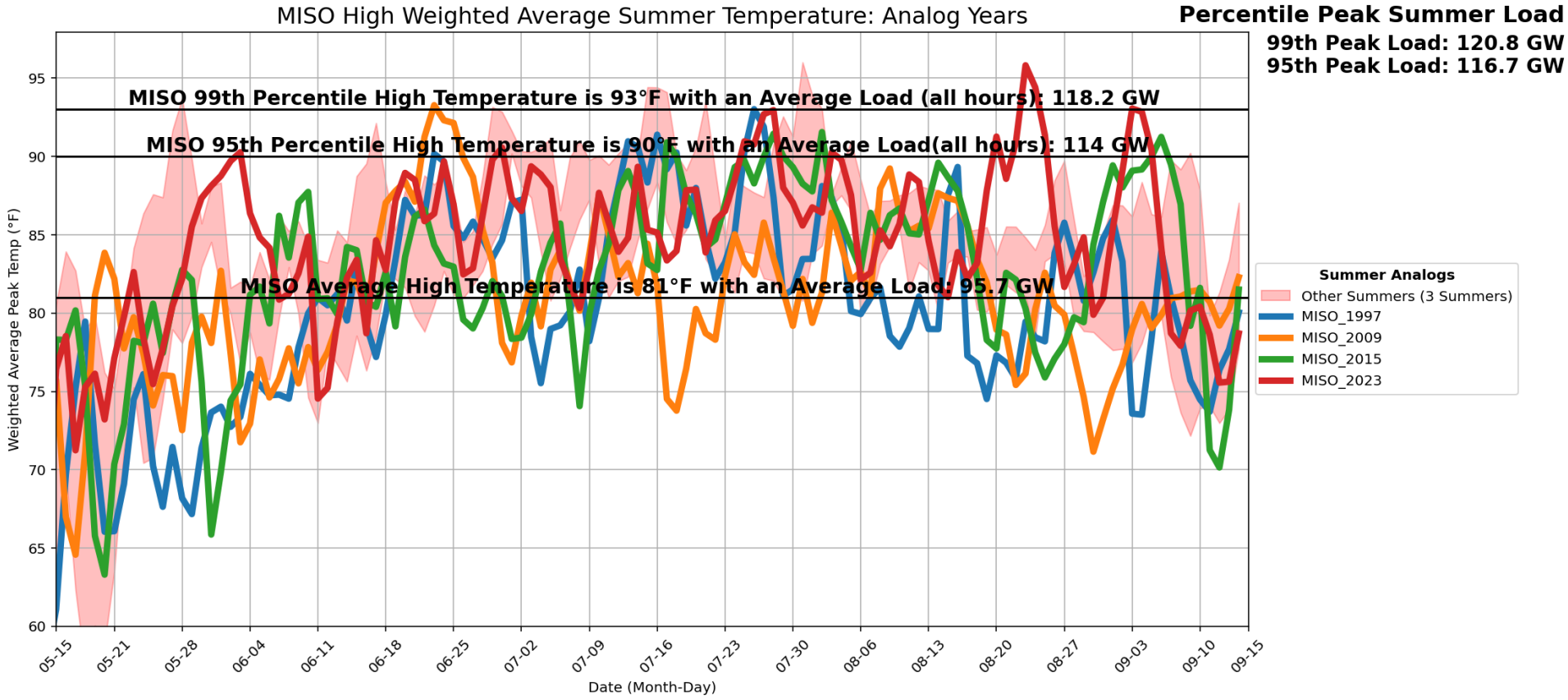
Systemwide, comparing top analog years to last year and lower match 2018, top analog years contain minimal hours reaching 99th percentile peak load. TX/LA heat did bring South load at/above 99th percentile in top years



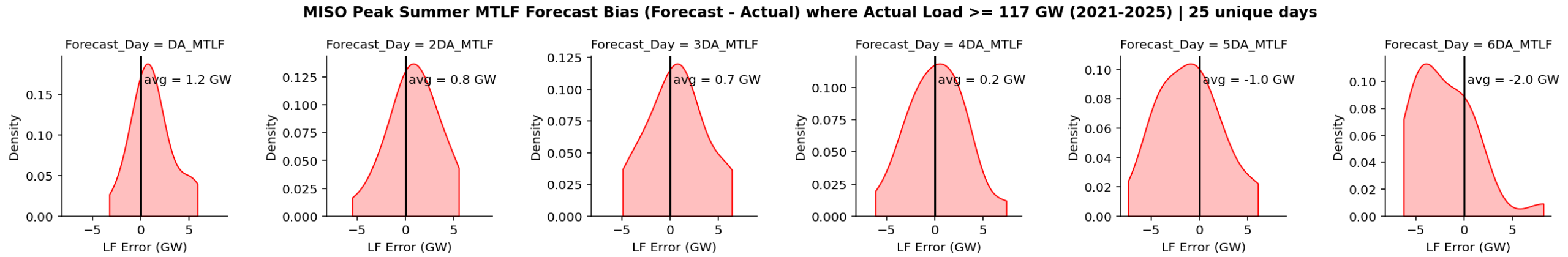


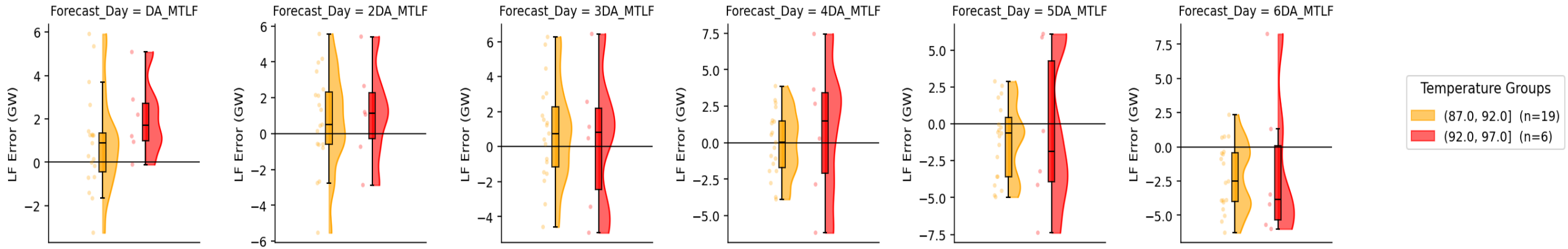
Key analog summers saw daily peak temperatures above the 95th percentile high temperature threshold, but few periods at 99th percentile high temperature threshold

The top analog year (2023) had major MISO heatwave reaching above the 99th percentile average load threshold driven by TX/LA heat dome



Summer peak load forecast bias is positive at DA and 2-DA primarily due to storm risks where peak load >= 95th percentile (117 GW)





Adam and Ella's Opinion

- While normal to below normal summer is expected in the North/Central, heat waves will be more likely and confined to the South region, especially if drought conditions persist.
- 2023 being the top analog had a similar orientation to this year's expectations. In August of that year, the South heat dome expanded north encompassing MISO's footprint producing our all-time peak load (not reconstituted). We'll monitor that risk closely this summer with El Niño strength.
- Solar growth will continue throughout the summer. Wind generation is forecast to be **below normal** and risks around the **daily cycle** (AM ramp down, PM ramp up) with ample solar will produce challenging Net Load ramps.
- With warm ocean waters over the Caribbean and Gulf, risks for 'homegrown' storms will have to be monitored closely despite a projected below normal season.

Summary

- A normal to slightly below normal summer is expected in the North/Central region with above normal temperatures in MISO South.
- Despite cooler signals for the Midwest and Plains, with heat more likely in the southern Plains and Gulf Coast, heat can expand northward periodically.
- Monitoring the development and strength of El Niño will provide confidence on both the cooler North/Central signal and lower tropical development potential.
- A near to slightly-below-normal hurricane season is expected in the Atlantic Basin this hurricane season.



Contact: Adam Simkowski, asimkowski@misoenergy.org
Ella Dankanics, edankanics@misoenergy.org



Seasonal Assessment: Generation

Andy Taylor, Manager, MISO Resource Adequacy

Seasonal Capacity Outlook – Summer 2026

LRZ	Price ($/MW-Day)
1-7	$424.30
8,10	$384.10
9	$412.10

Initial PRMR	ZRC Offered + FRAP	Final PRMR
137,922.8	142,553.1	142,374.3

- Implementation of the Reliability-Based Demand Curve has resulted in significant value for capacity beyond the 1-in-10 LOLE Requirement.
- Initial PRMR represents the traditional 1-in-10 LOLE Requirement.
- 4,451.5 ZRCs cleared beyond the 1-in-10 LOLE Requirement, resulting in the Final PRMR noted above.

Planning Resource	Offered (ZRC)	Cleared (ZRC)
Generation	124,690.1	124,511.3
External Resources	4,490.6	4,490.6
Behind the Meter Generation	4,272.9	4,272.9
Demand Resources	9,099.5	9,099.5
Energy Efficiency	0.0	0.0
Total	**142,553.1**	**142,374.3**

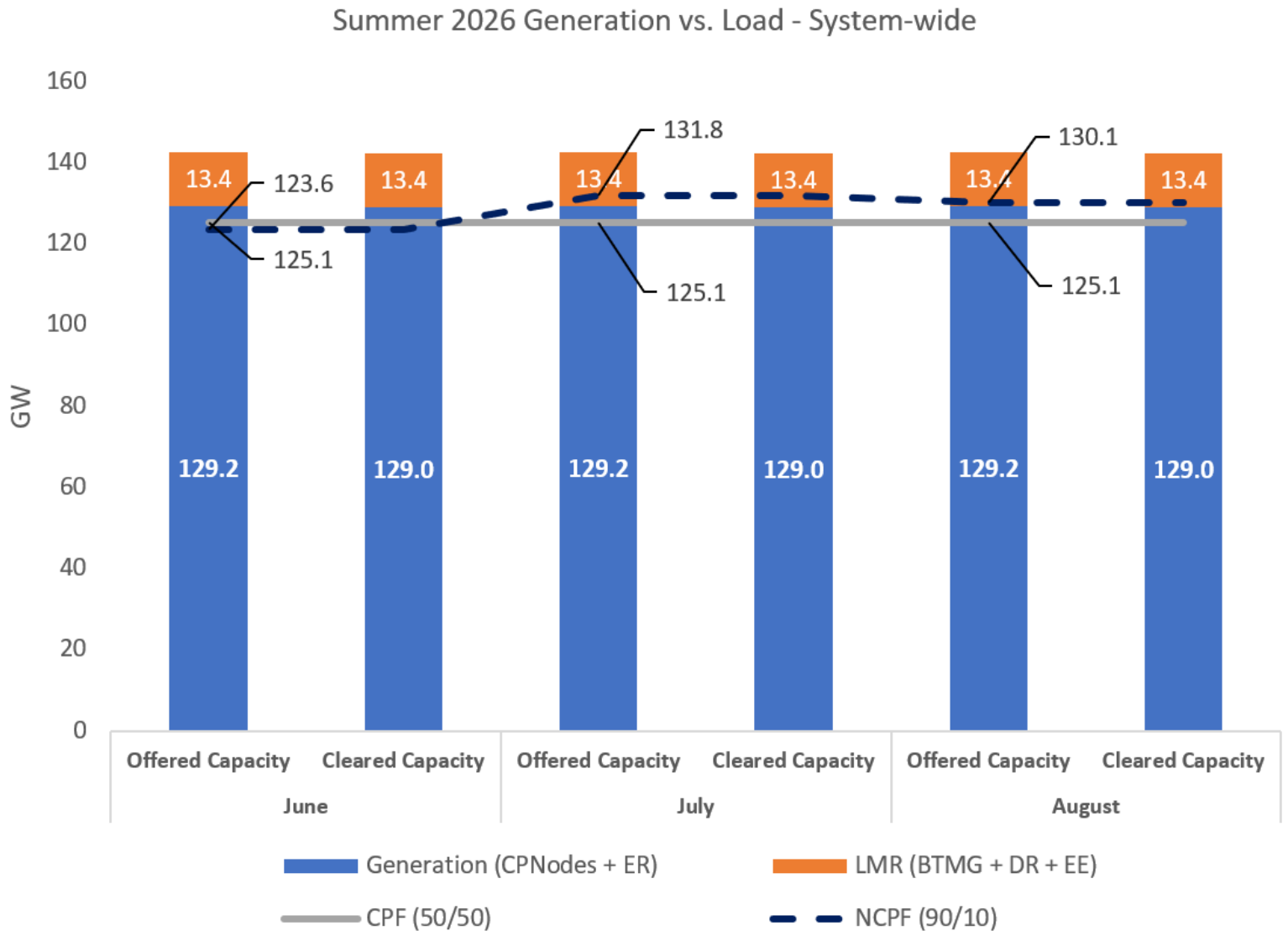
LRZ: Local Resource Zone PRMR: Planning Reserve Margin Requirement ZRC: Zonal Resource Credit FRAP: Fixed Resource Adequacy Plan

RBDC: Reliability-Based Demand Curve LOLE: Loss of Load Expectation

MISO systemwide accredited capacity compared to demand submitted by LSEs

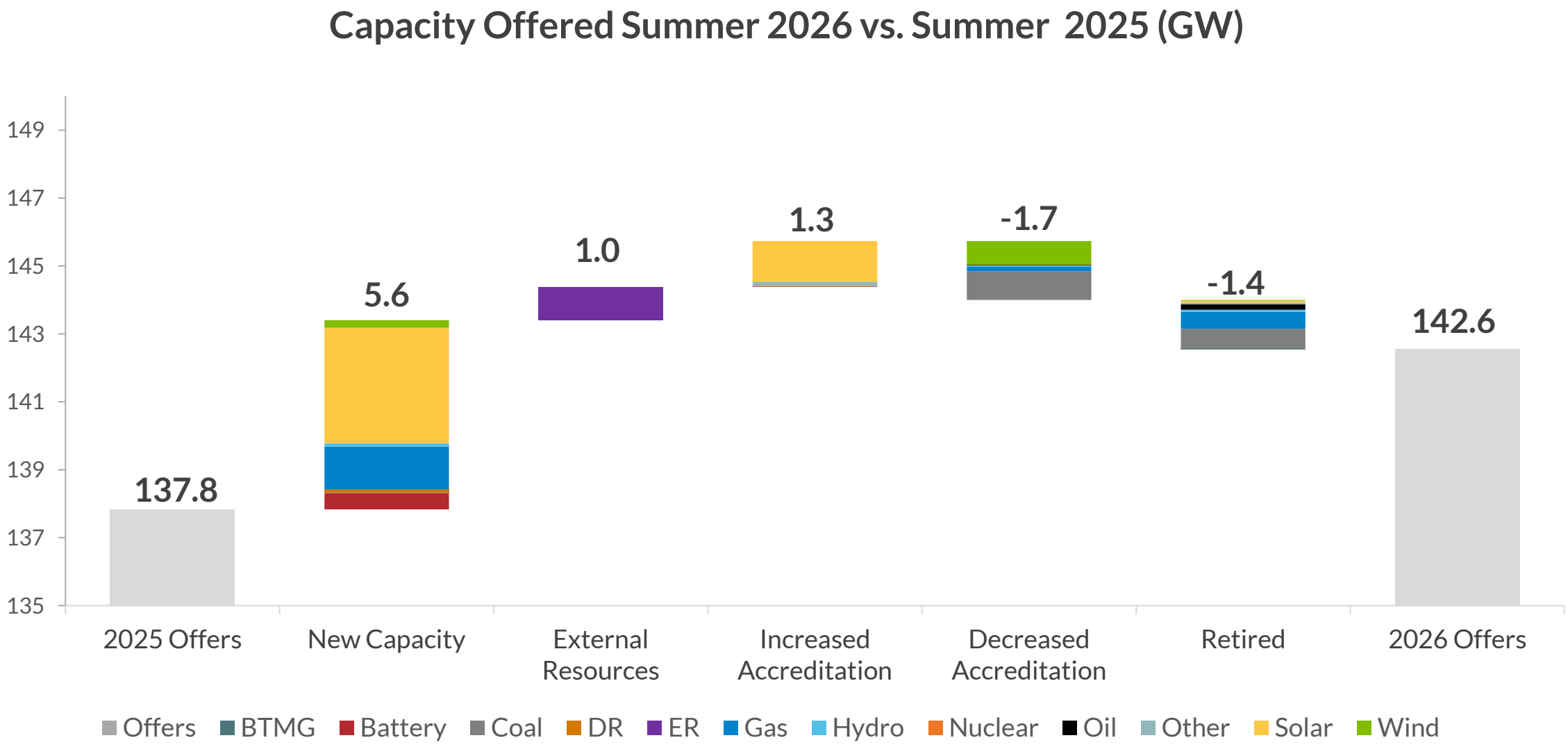
Coincident Peak Forecast is submitted by MISO LSEs relative to the MISO seasonal peak and calculated on a seasonal basis

Non-Coincident Peak Forecast is the peak load submitted by each LSE per month



LMR: Load Modifying Resource CPNodes: Commercial Pricing Nodes ER: External Resource
BTMG: Behind the Meter Generation DR: Demand Resource EE: Energy Efficiency
CPF: Coincident Peak Forecast NCPF: Non-Coincident Peak Forecast

New capacity additions outpaced decreased accreditation and suspensions/retirements



BTMG: Behind the Meter Generation. Capacity indicated is offered accredited value.



Contact: Andy Taylor, ataylor@misoenergy.org



Seasonal Assessment: Transmission

Fisseha Zewdu, Sr. Engineer, MISO Operations Planning FRES

The Coordinated Seasonal Assessment study is used to identify potential issues and develop plans before these issues occur in real time

Purpose:

Evaluate expected conditions across MISO footprint for summer season

Identify potential limitations and issues for upcoming season and develop operating plans

Coordinate with MISO members

Study Focus:

Steady-State Analysis

Bidirectional Transfer Studies

Load Pocket Studies

The 2026 summer model was built from the Eastern Interconnection base case with MISO Transmission projects and planned outages applied

Base Case:

- Built on the 2025/26 Summer ERAG MMWG model
- Generator Retirements approved on or before December 1, 2025, are offline
- Outages: Transmission and Generator Outages are modeled if they are greater than or equal to two months between the months of June through August
- TO's can recommend outages outside the period if deemed necessary

MOD Projects:

- MTEP Appendix A – Planned
- All the generation interconnection projects applied

Generation Assumptions:

- Renewables: Wind and Solar units dispatched at their capacity credit levels
- Qualified Facilities (QFs) and MISO South Load Pocket Op Guides honored

Steady State AC Contingency Analysis did not reveal any contingencies without operating plans for the summer season

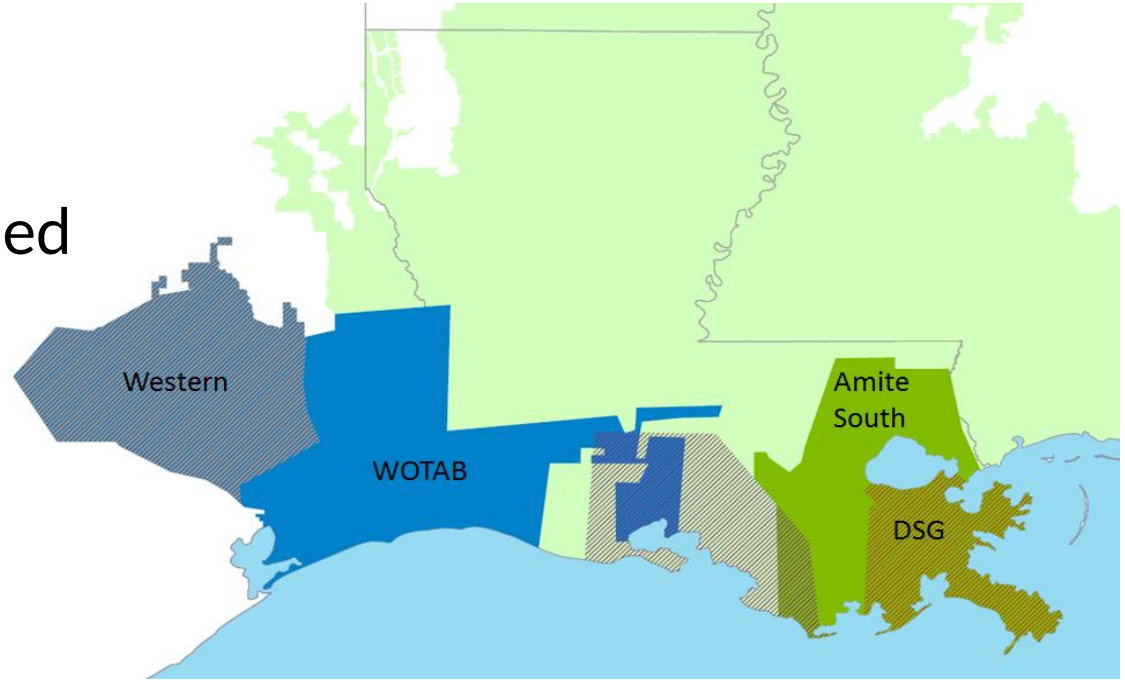
Approximately 18,900+ contingencies were studied

NERC defined Category P1 contingencies

- **P1.1** – three phase faulted generator (>50 MW)
- **P1.2** – three phase faulted transmission circuit
- **P1.3** – three phase faulted transformer
- **P1.4** – three phase faulted shunt device
- **P1.5** – single line to ground dc pole

MISO regularly runs import studies for the Load Pockets

- The peak load conditions for the three MISO load pockets are simulated:
  - Amite South at 7,592 MWs
  - Down stream of Gypsy (DSG) at 3,247 MWs
  - Western at 2,735 MWs
- Transfer studies into the pockets are performed
- Results are used to identify import limits for the pockets



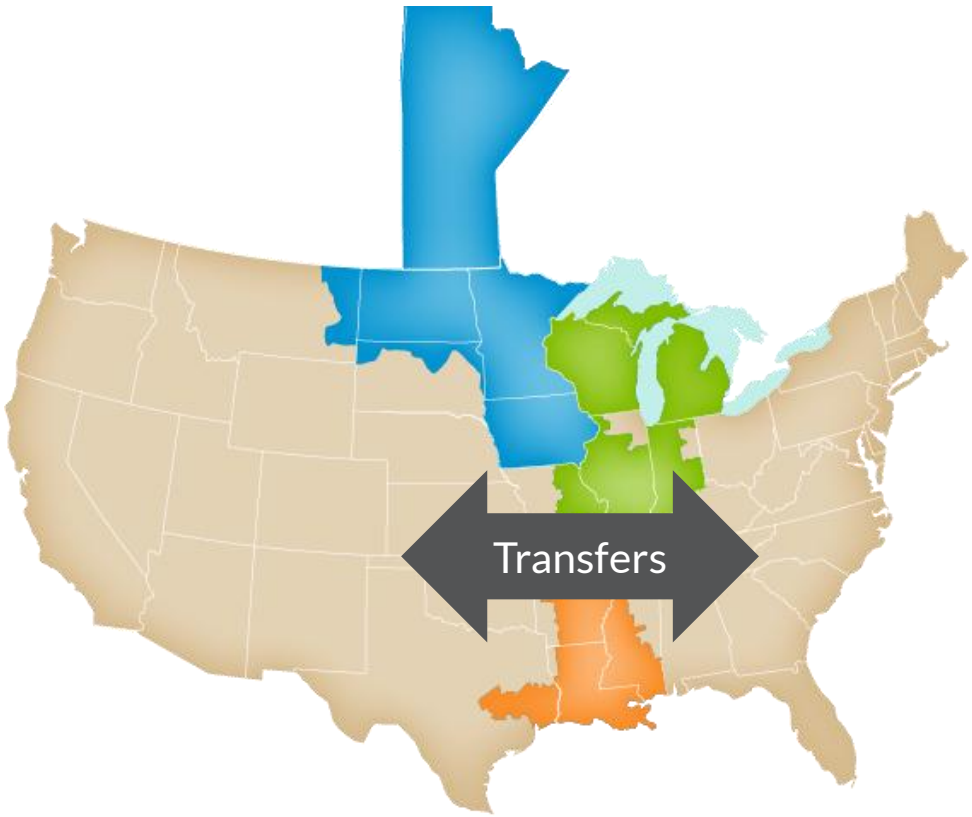
Load Pocket transfer results indicate that import limits are in line with current operating guides

Load Pocket	Monitored Element	Limiting Contingency	Violation Type	Import Capability (MW)
AMITE SOUTH	Slidel – Front Street 230kV	Marion – Hatisburg 230kV and 1SOXY Unit 1	Thermal	3,622
DSG	Good Hope – Prospect 230kV	Waterford – Churchill 230kV and Ninemile Point Unit 5	Thermal	2,365
*Western	Grimes – MT. Zion 138kV	*Cypress – Honey 138kV and MCPS Full Station	Thermal & Voltage	1,234

* Additional generation or reactive resources are required to maintain voltage/reactive balance under this contingency.
* The limit is with Frontier generation at full capacity during summer peak loading condition. N1G1 would not solve without it.

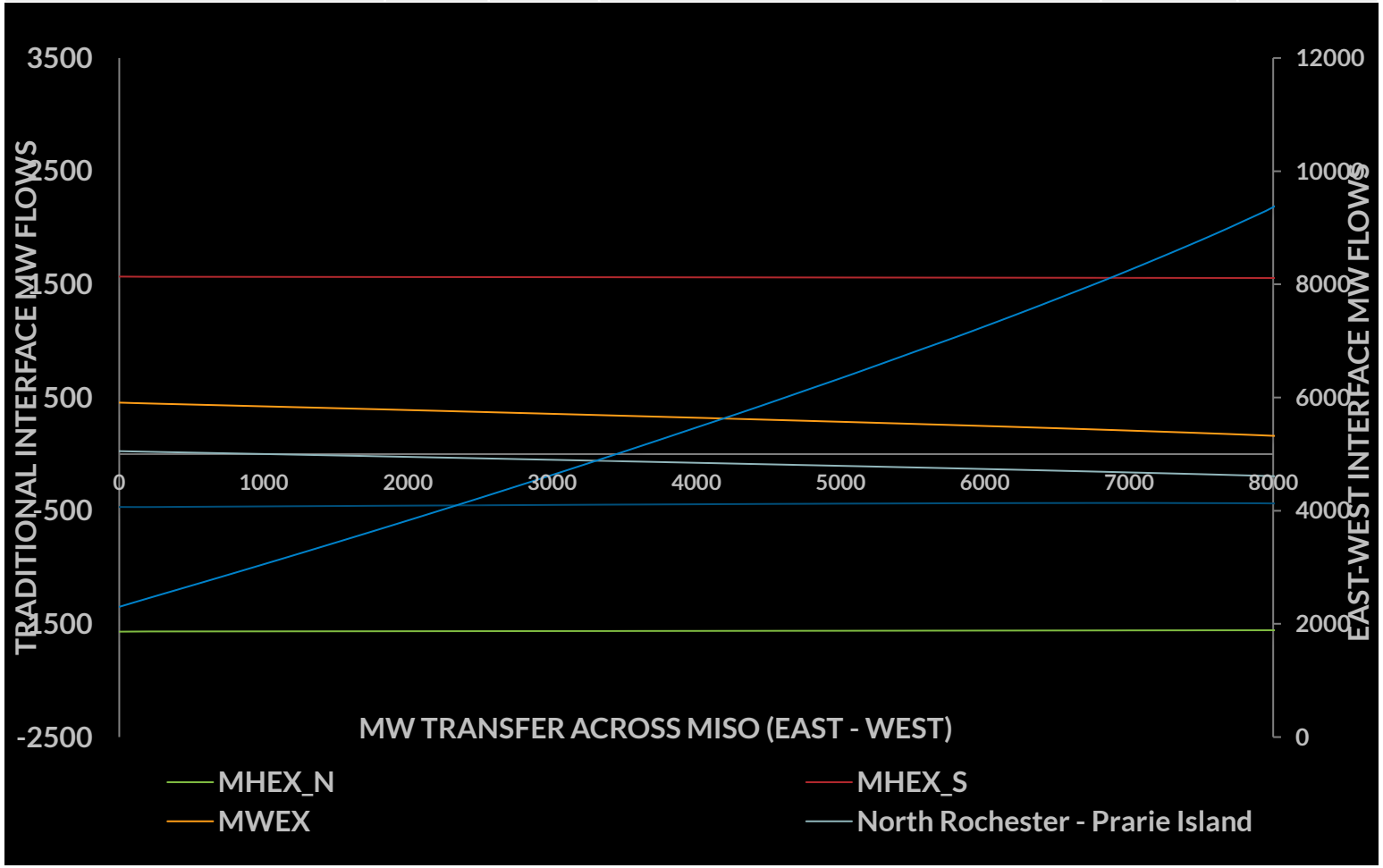
Bidirectional transfer studies across the MISO footprint to identify main constraints with transfers between MISO neighbors

- Transfers across MISO between East and West systems:
  - East system – PJM, SERC (without AECI)
  - West system – SPP and AECI
- Transfer value selected above realistic transfers to identify leading constraints
  - 15,000 MW used
- Flows measured at all tie points and lines bypassing MISO



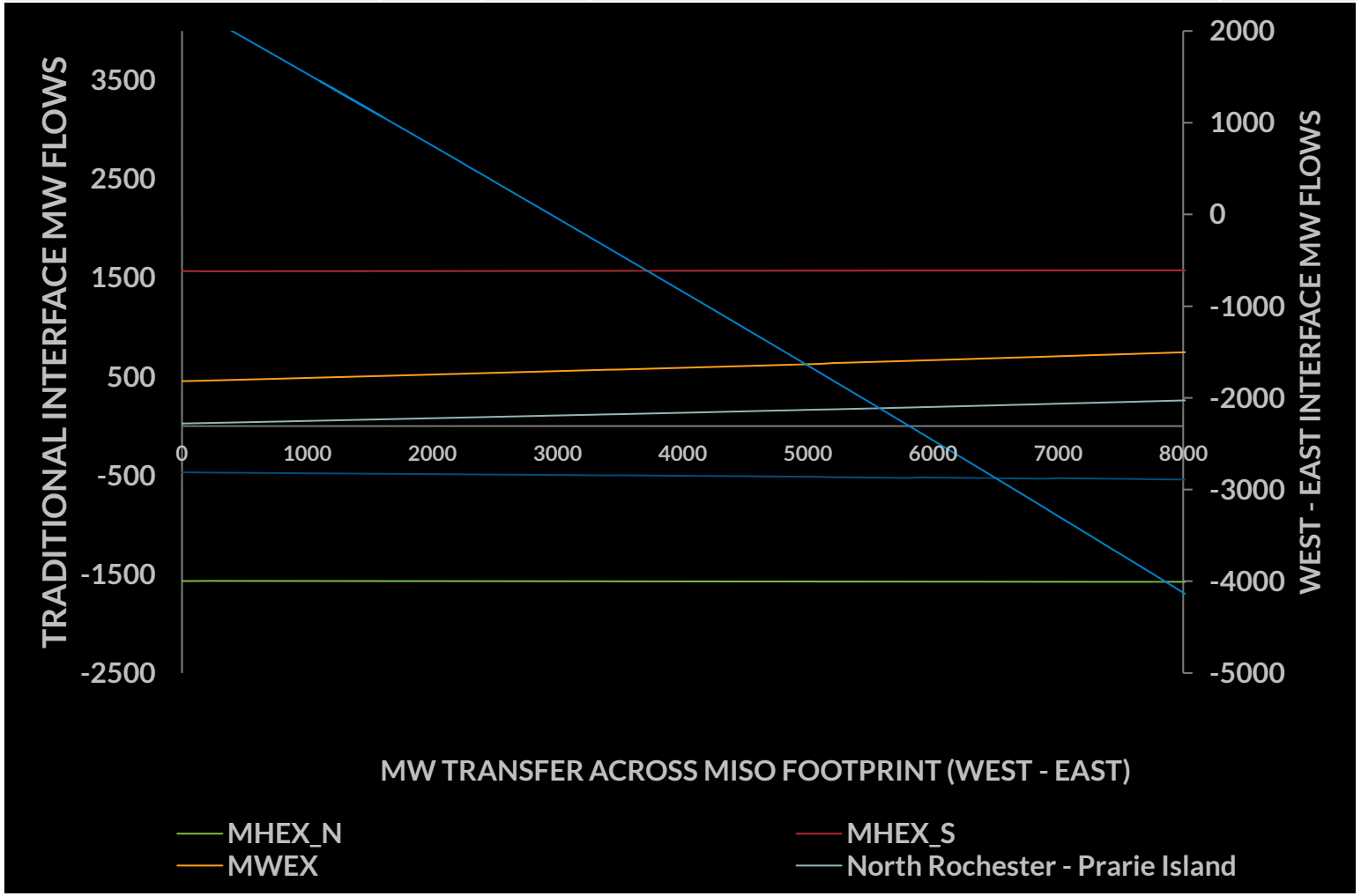
East to West transfer leading constraints and interface flows identified during study

Monitored Facility	Rating	Area	Contingency Name	DC TrLim	AC TrLim
SOUTHLAND - MT HOME 161kV	162	EES_EAI	EA16039: HARRISON EAST-HILLTOP 161	1441.6	1441.6
LAKEOVER 500/230 AT2	615	EES_EMI	EE50X47: LAKEOVER 500/115 AT1	2010.9	2010.9
INDEPENDENCE SES – MOOREFIELD 161	310	EES_EAI	EA16098: QUITMAN - CLINTON WEST 161	3172.9	3172.9



West to East transfer leading constraints and interface flows identified during study

Monitored Facility	Rating	Area	Contingency Name	DC TrLim	AC TrLim
GIBSON – PETERSBURG 345kV	1279	DEI/IPL	CIN34027: BEDFORD-GIBSON 345kV	3710.8	5533.3
PATMOS WEST - LEWISVILLE 115kV	159	EES-EAI	CSW34X40: CROCKETT 345/138 TA TB	5152.2	5347.5
OVERTON 345/161 kV Xfmr	560	AMMO	AEC34014: KINGDOM - MCCREDIE 345kV	6249.5	6249.5





Contact: Fisseha Zewdu, fzewdu@misoenergy.org



MISO

Seasonal Risk / Uncertainty Management

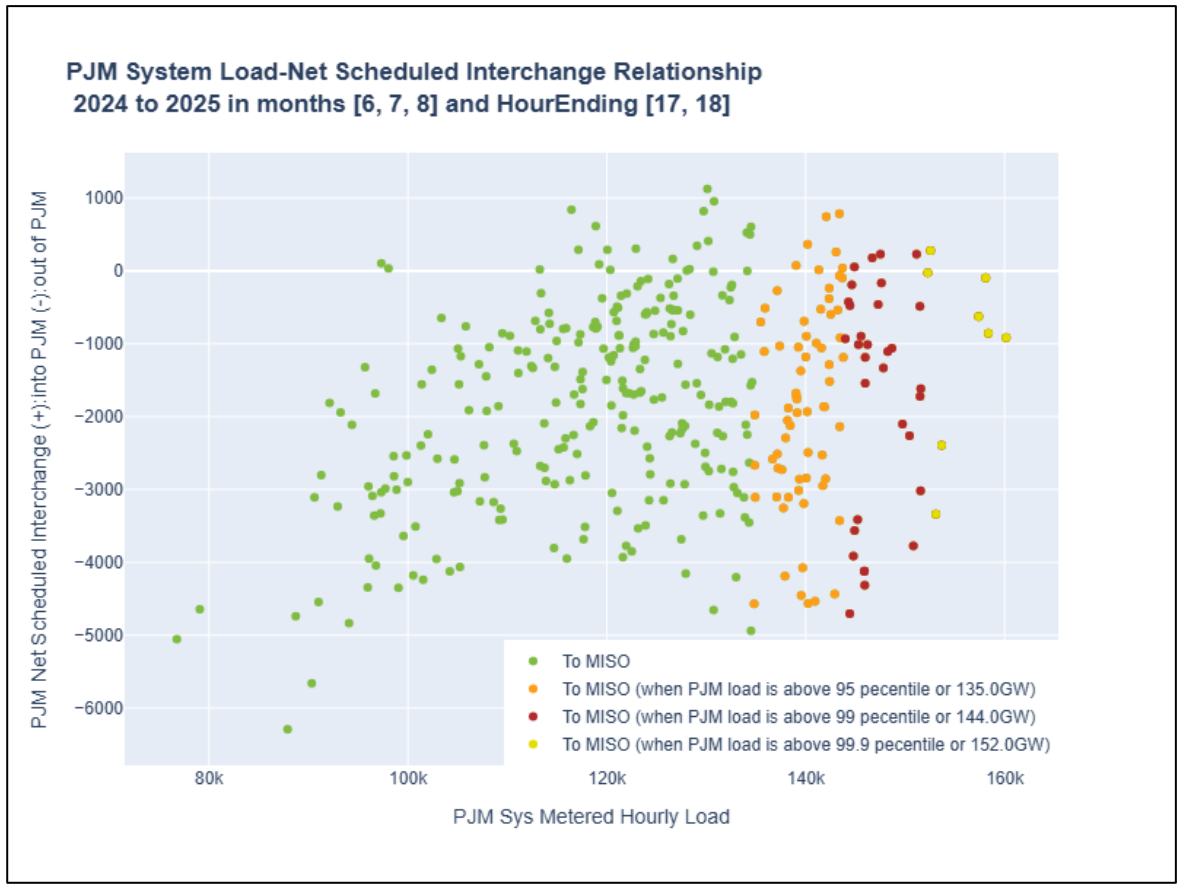
Matt Campbell, Manager, Operations Risk Assessment

Net Scheduled Interchange (NSI)

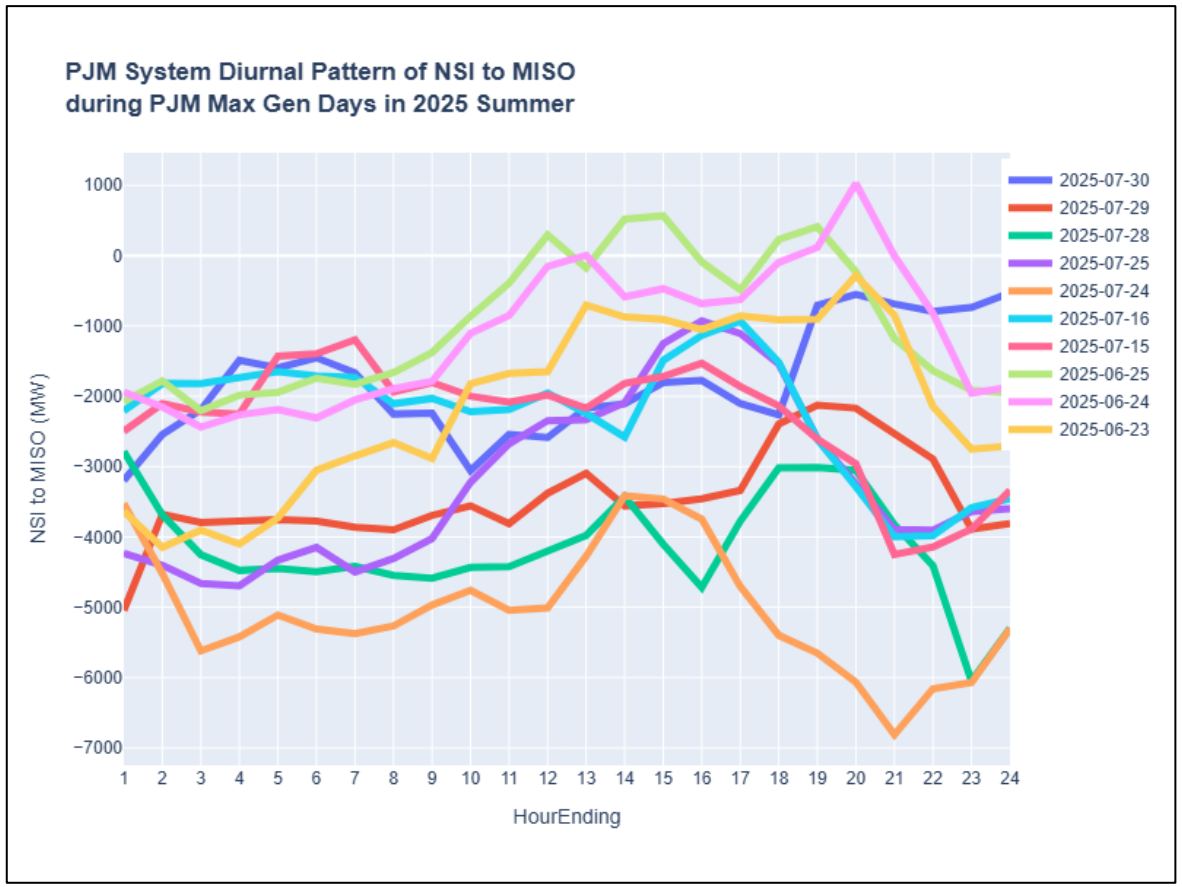
- Using historical NSI-load relationship for NSI risk assessment.
- Actively tracking neighbors' system forecasts, particularly during extreme conditions.

Net Scheduled Interchange Risk

Using historical NSI-load relationship for NSI risk assessment

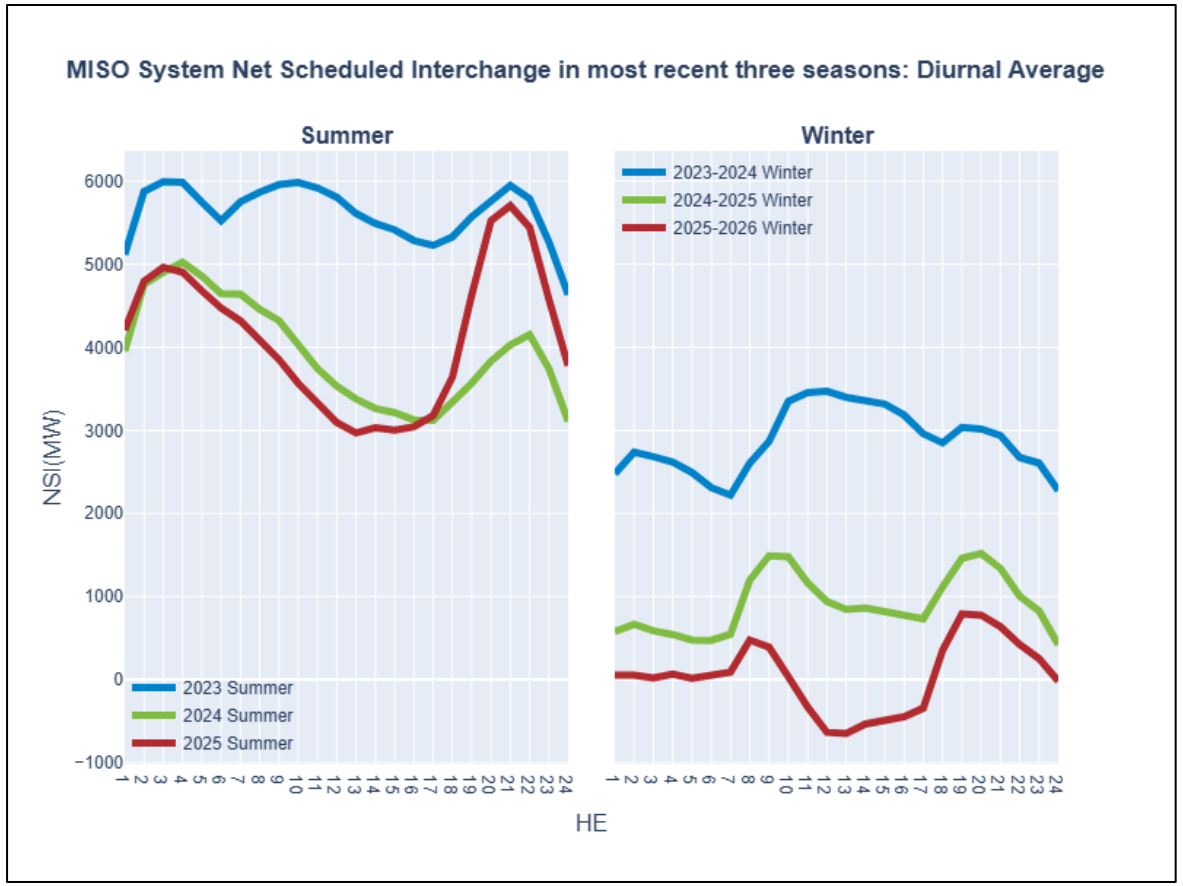


PJM's capability of import energy into MISO has great variation across its Max Gen days

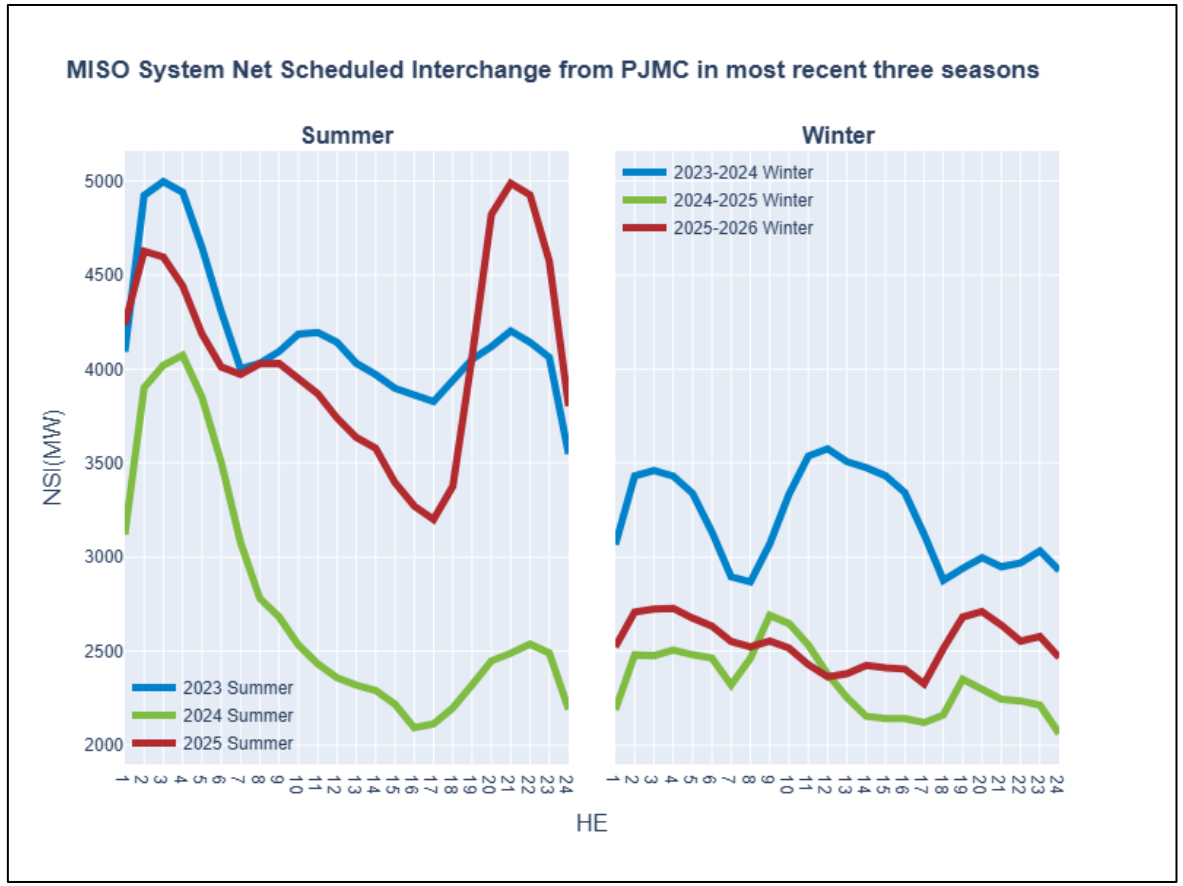


Net Scheduled Interchange Risk

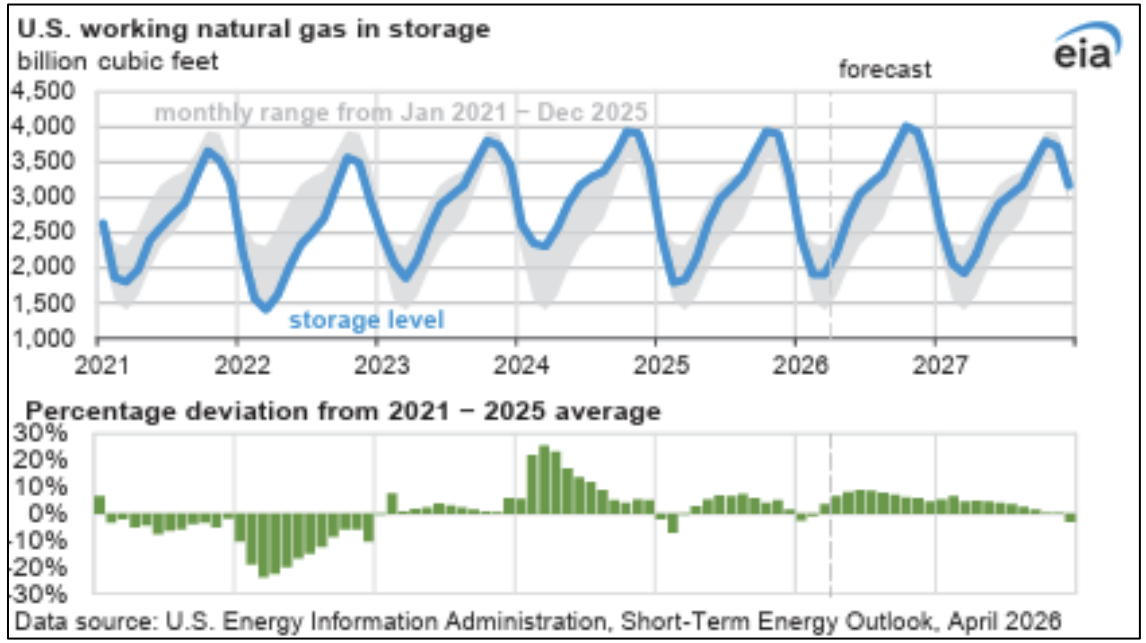
On average, MISO relies more on NSI import during summer months than in winter season



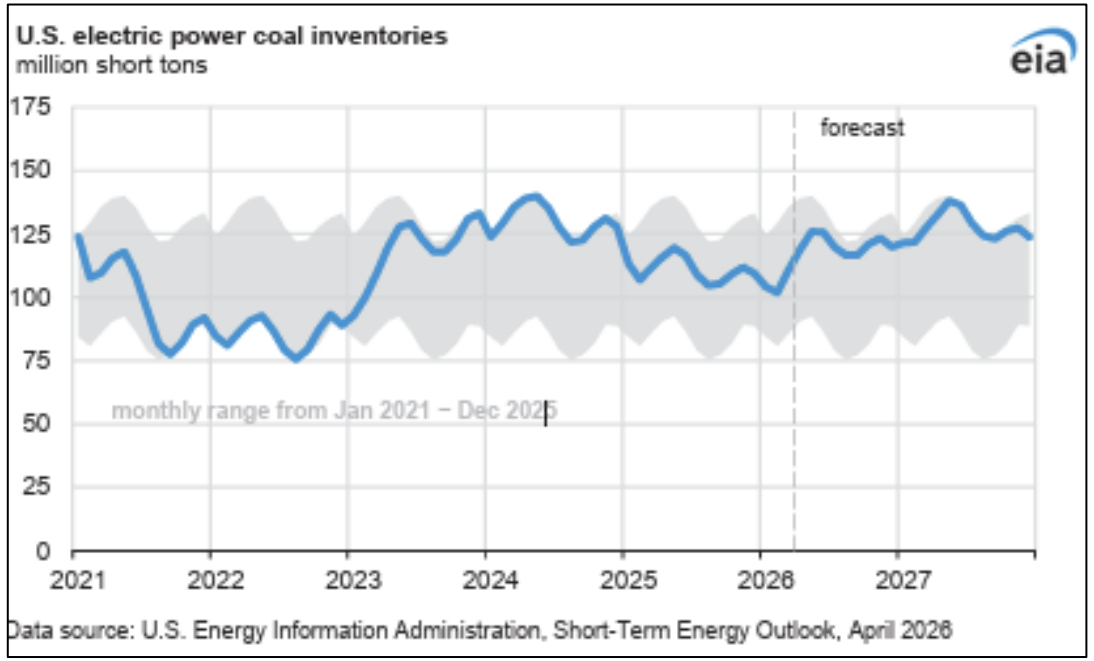
PJM accounts for the bulk of NSI import in summer months, with great variation in past three seasons



Dispatchable Thermal Generation Risk

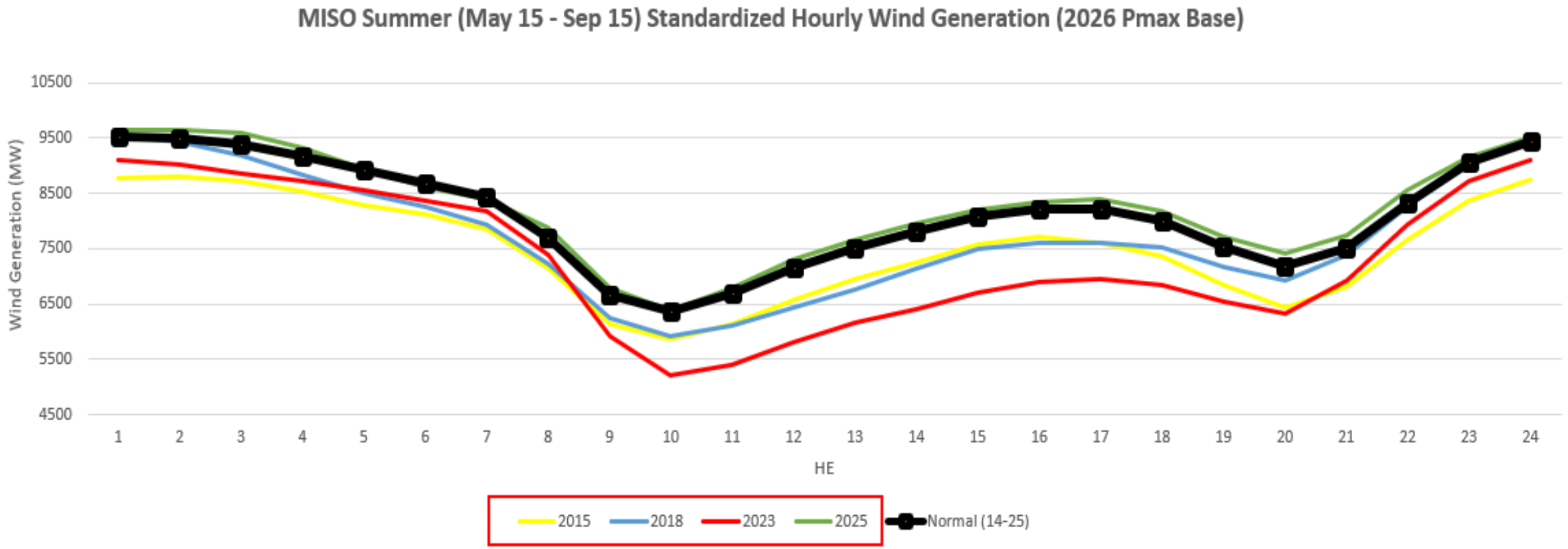


- The balance between natural gas and coal generation will depend on fuel availability and delivery. Natural gas storage is projected to be higher than the 5-year average each month.

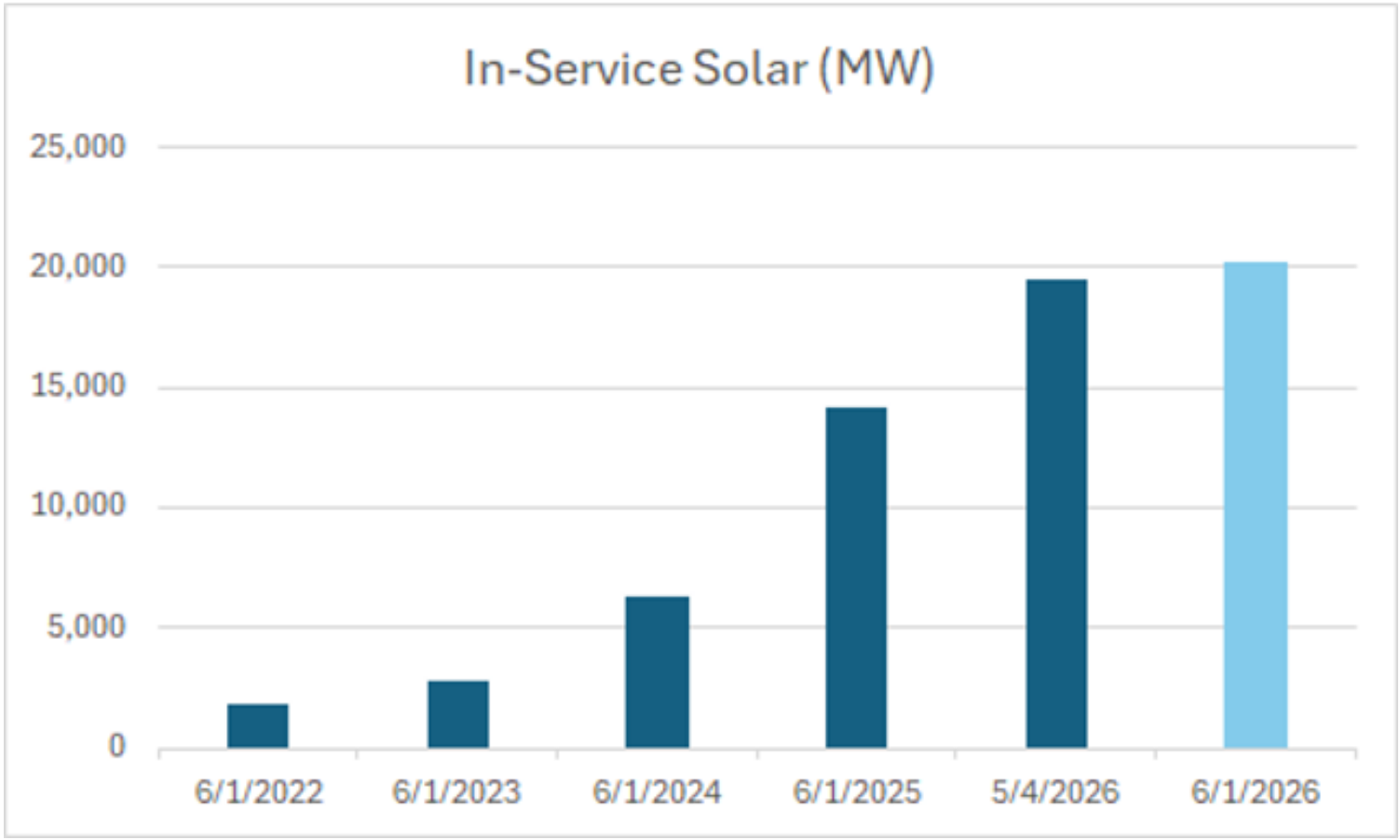


- Coal inventories at power plants are expected to be higher than last summer and on the high end of the 5-year average.

Analog years for summer 2026 indicate **below normal** wind output

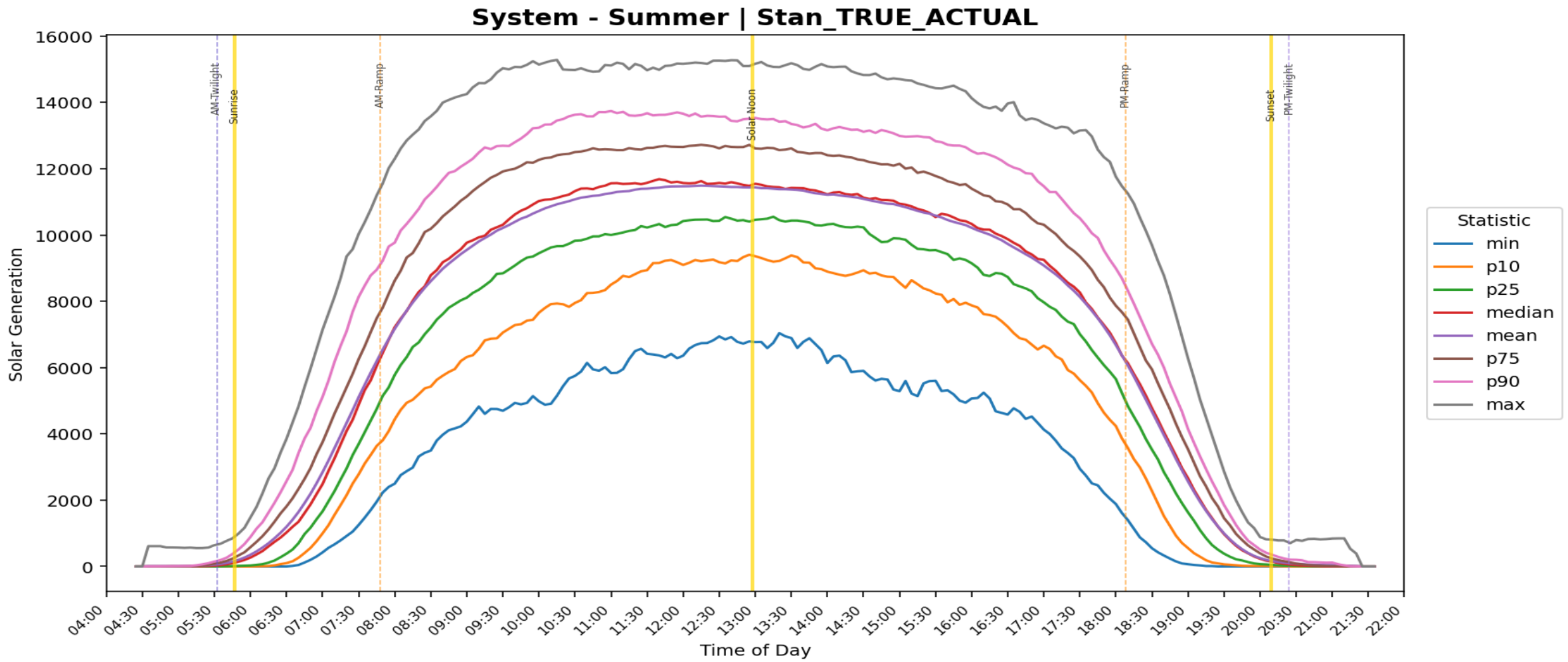


MISO is projected to have 20 GW of solar in our market in June 2026

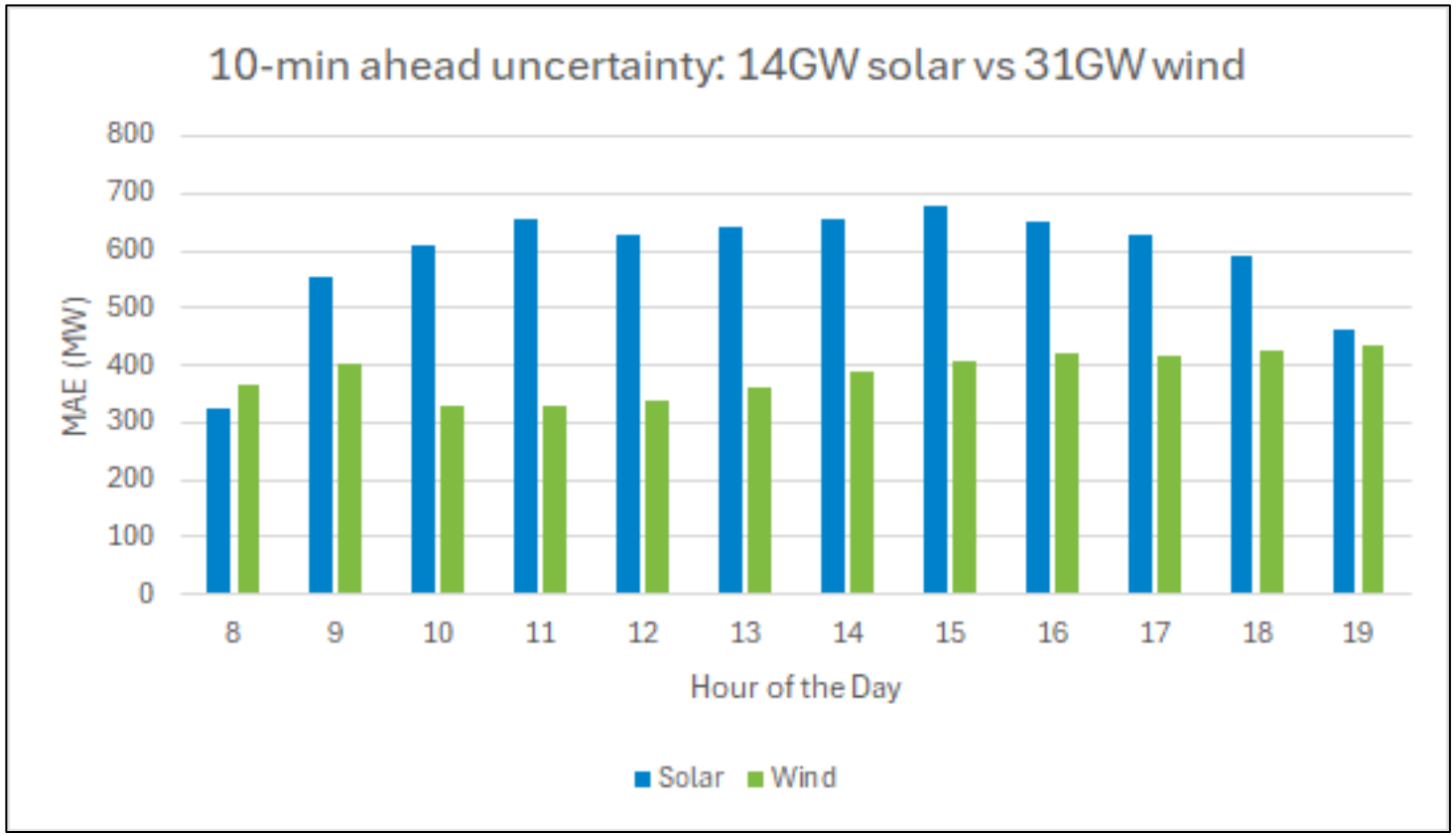


Solar expectations based for summer

Data standardized to latest MISO Pmax: Average daytime solar expected to be ~11 GW

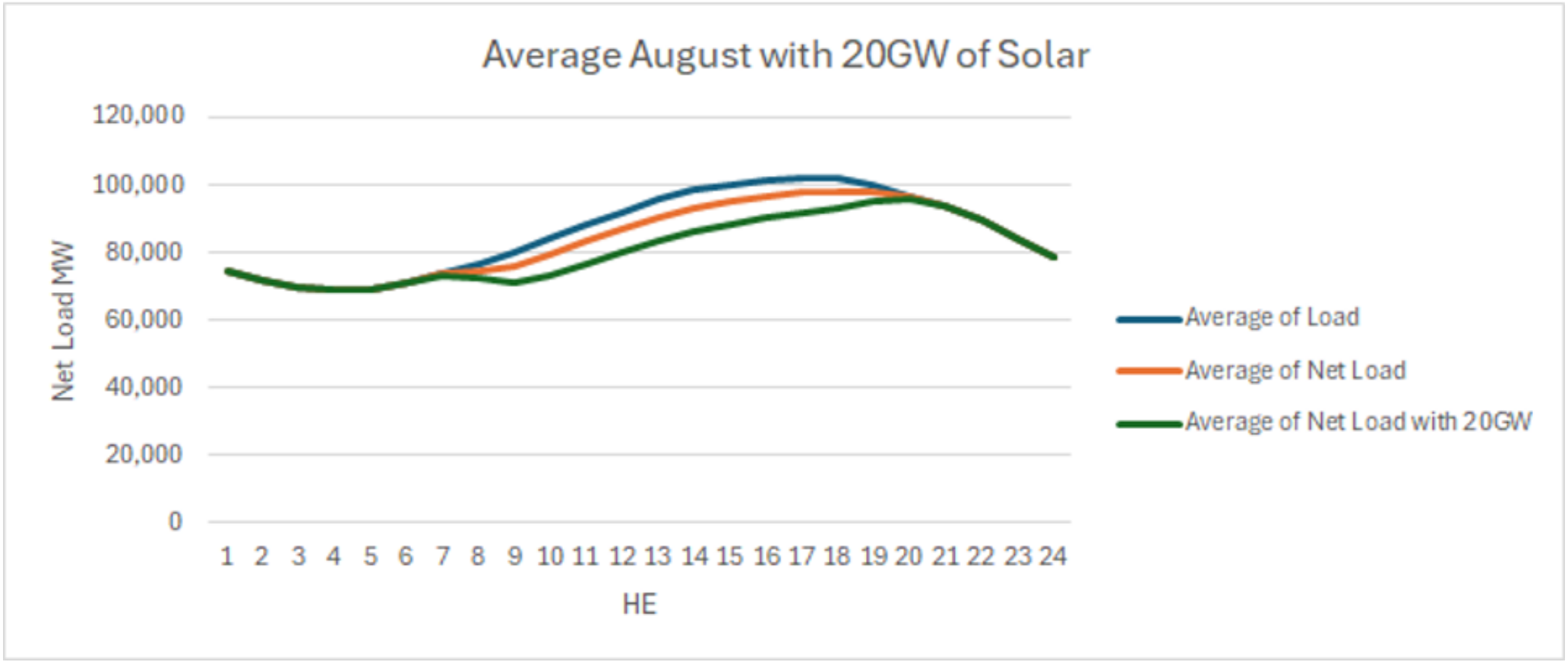


Solar uncertainty more challenging in real time than wind



Performance over last summer

Expected in service solar shifts peak hour from HE17 to HE20



Enhanced uncertainty management based on learned opportunities

- Enhanced quantification models to derive seasonal reserve requirements
- Shift from Peak Hour to ALL HOUR process
- Assess all 24-hour ND-FRAC Net Uncertainty forecast to determine Low/Medium/High prediction for setting Commitment Threshold
- Assess Commitment Threshold across all 24-hour conditional on load and renewable level
- Prepare implementation of Dynamic Regulation Requirement expected June 2026

Assess all 24-hour ND-FRAC Net Uncertainty forecast to determine low/medium/high prediction for setting Commitment Threshold

- A market day will be labeled as low/medium/high based on:
  - L/M/H at peak hour; or
  - Count of M/H hours in a day

Using 3/16/2026 as example:

- Medium at Peak Hour HE 20
- High when counting M/H hrs
- Final determination: HIGH

MKTDAY	HE	Uncertainty
3/16/2026	1	1-Low (Green)
3/16/2026	2	1-Low (Green)
3/16/2026	3	2-Medium (Yellow)
3/16/2026	4	2-Medium (Yellow)
3/16/2026	5	2-Medium (Yellow)
3/16/2026	6	2-Medium (Yellow)
3/16/2026	7	2-Medium (Yellow)
3/16/2026	8	2-Medium (Yellow)
3/16/2026	9	2-Medium (Yellow)
3/16/2026	10	2-Medium (Yellow)
3/16/2026	11	3-High (Orange/Red)
3/16/2026	12	3-High (Orange/Red)
3/16/2026	13	3-High (Orange/Red)
3/16/2026	14	3-High (Orange/Red)
3/16/2026	15	3-High (Orange/Red)
3/16/2026	16	3-High (Orange/Red)
3/16/2026	17	3-High (Orange/Red)
3/16/2026	18	3-High (Orange/Red)
3/16/2026	19	3-High (Orange/Red)
3/16/2026	20	2-Medium (Yellow)
3/16/2026	21	1-Low (Green)
3/16/2026	22	1-Low (Green)
3/16/2026	23	1-Low (Green)
3/16/2026	24	1-Low (Green)

Assess commitment threshold across all 24-hour conditional on load and renewable level

April 13, 2026

Next-Day FRAC Commitment Thresholds Details (ALL HOUR PROCESS)

Select Forecast Market Day: April 13, 2026

Region	PEAKHOUR	ALLHOUR	FINAL	Primary Commitment Threshold	Supplement Commitment Threshold	Commitment Threshold (MW)
Systemwide	Low	Low	Low	5,000	6,600	6,600

Systemwide

HE	FORECAST MTLF Input	FORECAST WIND Input	Supplement Commitment Th..
1	63,924	20,093	6,300
2	62,525	19,066	4,800
3	61,826	17,677	4,800
4	61,937	16,219	4,800
5	63,573	15,314	4,800
6	65,462	15,070	5,400
7	69,705	14,943	5,400
8	72,904	14,934	5,000
9	74,352	15,010	5,000
10	75,681	15,449	5,000
11	76,982	16,339	5,000
12	78,219	17,366	6,000
13	79,439	18,670	6,600
14	80,021	19,763	6,600
15	80,958	20,249	6,600
16	82,023	20,187	6,600
17	83,027	19,834	6,600
18	83,339	19,167	6,600
19	82,810	18,311	6,000
20	81,993	17,740	6,000
21	80,978	17,392	6,000
22	77,599	17,050	5,000
23	73,018	16,633	5,000
24	68,865	15,965	5,400



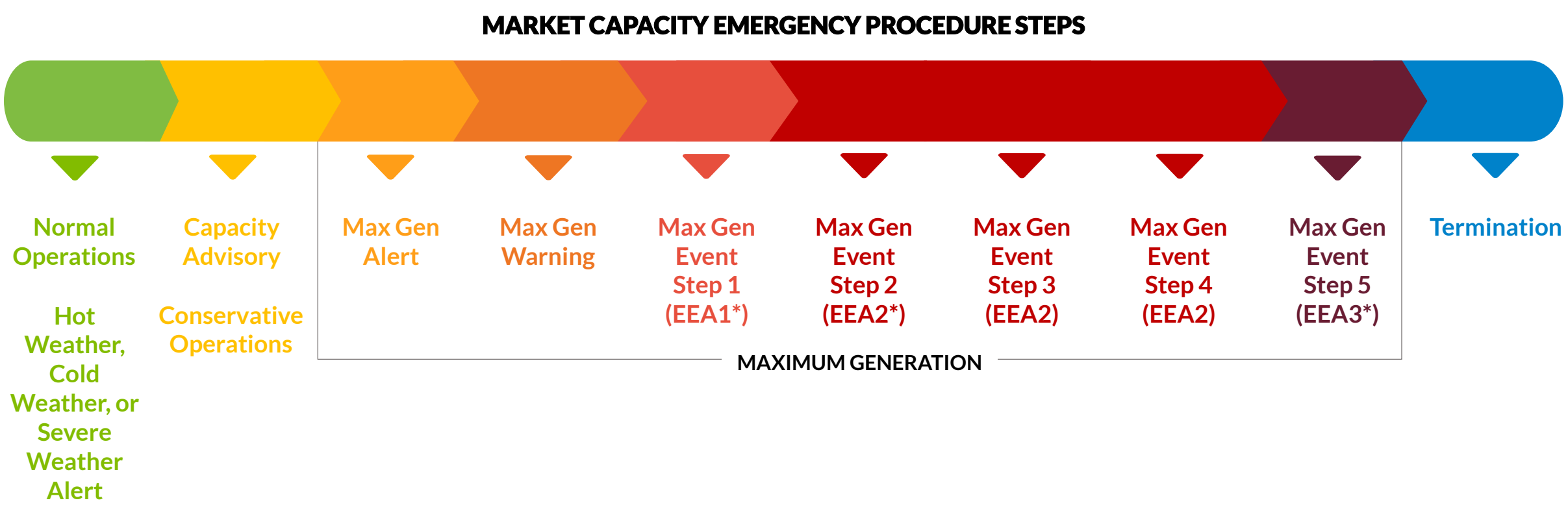
Contact: Matt Campbell, mcampbell@misoenergy.org



Emergency Procedure & Capacity Emergency Changes

Don Hunter, Manager, MISO Control Room Operations

Current Procedures through May 30, 2026

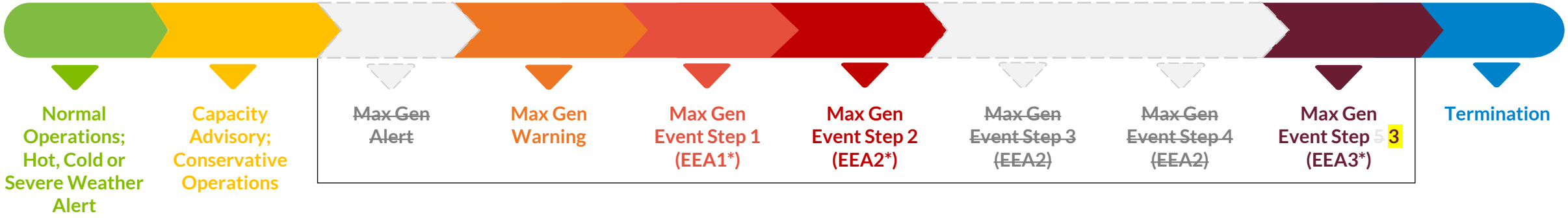


Emergency procedures escalate as capacity conditions tighten; associated actions are designed to balance the real-time supply of energy with demand on the system

*See appendix for definitions

What's Changing

PROPOSED MARKET CAPACITY EMERGENCY PROCEDURE STEPS



CHANGES INCLUDE

- Eliminate Maximum Generation Alert
- Move procedure Step 1a (commitment of emergency-only resources) from Step 1 to Maximum Generation Warning
- Merge Maximum Generation Steps 3 and 4 with Step 2
- Rename Maximum Generation Event Step 5 to Event Step 3

*See appendix for definitions

Effective June 1, 2026

MARKET CAPACITY EMERGENCY PROCEDURE STEPS



Emergency procedures escalate as capacity conditions tighten; associated actions are designed to balance the real-time supply of energy with demand on the system

*See appendix for definitions

The grid conditions gauge on MISO's website reflects active market capacity conditions for members and the public

Green	Yellow	Orange	Dark Orange	Red
Grid is stable and conditions are normal	*Grid is stable and advisories or warnings are issued*	*Grid is stable and power demand could exceed supply available*	*Grid is stable and emergency power and/or reduced demand is needed*	*Power interruptions imminent or happening*
Hot Weather Alert	**Capacity Advisory**	**NERC Energy Emergency Alert 1 (EEA1)**	**NERC Energy Emergency Alert 2 (EEA2)**	**NERC Energy Emergency Alert 3 (EEA3)**
Cold Weather Alert	**Conservative Operations**			
Severe Weather Alert	**Maximum Generation Warning**			

Grid Conditions Gauge vs. Capacity Emergency Notifications

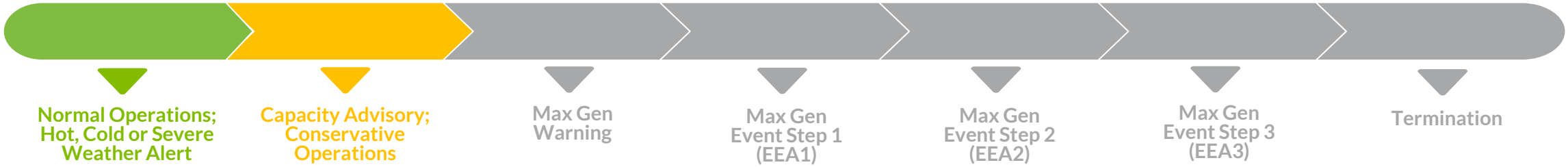
The gauge needle moves when an alert, advisory, warning, event or termination *takes effect*, not when a notification is sent. Notifications take precedence over what is seen on the gauge.



Grid Conditions at a Glance

MARKET CAPACITY EMERGENCY PROCEDURE STEPS

(1 of 3)



STATUS	TRIGGER	COMMUNICATION	AVAILABLE MISO ACTIONS*	REGULATORY	STAKEHOLDER/MEDIA
Normal Operations	None	None	Normal operating procedures	None	None
Hot, Cold, or Severe Weather Alert	Could be approaching tight supply due to weather-related circumstances, like extreme heat or cold, or severe wind, storms, and tornados	**Alert for situational awareness**	• Review outage plans for deferral or cancellation • *Normal pricing*	MISO alerts FERC, NERC, DOE, State Commissions, and Regional Entities	• Message to members and neighboring RCs through Operator Interface and RCIS • Notification posted to MISO website • Email sent to Real-Time Market Mailing List
Capacity Advisory	Capacity shortage is forecast within the next few days	**Advisory for situational awareness**	• Request market participants update offer data • Allows MISO to line up LMRs that are unavailable under normal operating conditions • Increase STR requirements • *Normal pricing*	Same as above	Same as above
Conservative Operations	Reliability issue possible for defined area (may be capacity-driven or caused by other abnormal circumstances)	**Alert for situational awareness**	• Potentially suspend transmission maintenance • Review outage plans for deferral or cancellation • Define boundaries • Suspend maintenance • *Normal pricing*	Same as above	Same as above

*MISO's Shift Manager determines which actions are needed and that is shared through Operator Interface.
See appendix for definitions

Effective June 1, 2026

MARKET CAPACITY EMERGENCY PROCEDURE STEPS

(2 of 3)

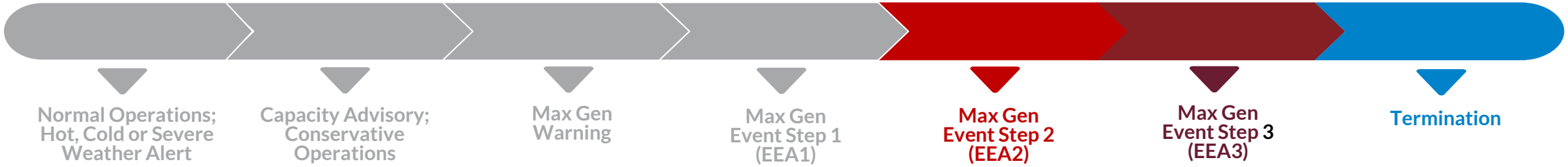


STATUS	TRIGGER	COMMUNICATION	AVAILABLE MISO ACTIONS*	REGULATORY	STAKEHOLDER/MEDIA
Maximum Generation Warning	Reserve margin shortage is forecast	**Warning to prepare for possible event**	• Declare *Conservative System Operations* • Prepare for potential Maximum Generation event • Schedule all available economic resources • Curtail non-firm exports • Reconfiguration • Commit emergency-only resources** • Request environmental waivers as appropriate • *Emergency Tier 1 Offer Floor*	Same as above	Same as above
Maximum Generation Event Step 1 (EEA1)	Reserve margin requirements cannot be met through normal economic resources; all available resources in use	**Declare EEA1**	• Activate emergency operating ranges • *Emergency Tier 1 Offer Floor*	• EEA Notification • MISO NERC Alert • MISO contacts state/local leaders	MISO corporate communications initiates contact with impacted member communicators

*MISO's Shift Manager determines which actions are needed and that is shared through Operator Interface.
**Moved from previous Step 1a
See appendix for definitions

MARKET CAPACITY EMERGENCY PROCEDURE STEPS

(3 of 3)

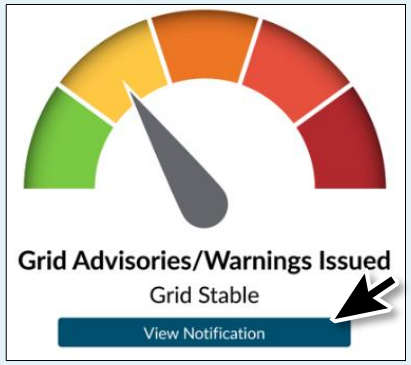


STATUS	TRIGGER	COMMUNICATION	AVAILABLE MISO ACTIONS*	REGULATORY	STAKEHOLDER/MEDIA
Maximum Generation Event Step 2 (EEA2)	Demand cannot be met; actions needed to reduce demand and/or acquire additional supply	**Declare EEA2**	• Instruct load to be reduced via LMMs-Stage 1 or Stage 2 and LMRs or EDRs • Implement emergency energy purchases • Instruct LBAs if public appeals needed** • Implement spinning and supplemental reserves • Request and implement environmental waivers • Initiate external emergency energy purchases • *Emergency Tier 2 Offer Floor*	Same as above	Same as above
	Attempting to maintain minimum Contingency Reserves				
	All available MISO resources used				
Maximum Generation Event Step 3 (EEA3)	Unable to maintain minimum Contingency Reserves	**Declare EEA3**	• Coordinated load shed • *VOLL pricing*	Same as above	Same as above
Termination	Max Gen and, possibly, Capacity Advisory termination	**Event terminated**	• Update stakeholder market data • *Normal pricing*	Same as above	Same as above

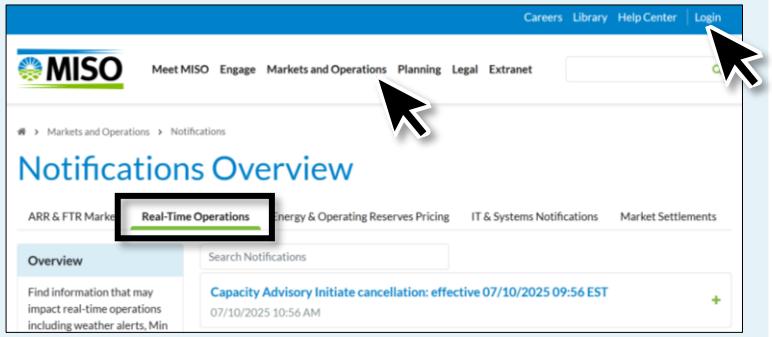
*MISO's Shift Manager determines which actions are needed and that is shared through Operator Interface.
**Public appeals to reduce demand is based on internal LBA procedures, system conditions and Event projections provided by MISO
See appendix for definitions

View MISO's real-time grid status and subscribe to notifications

Website



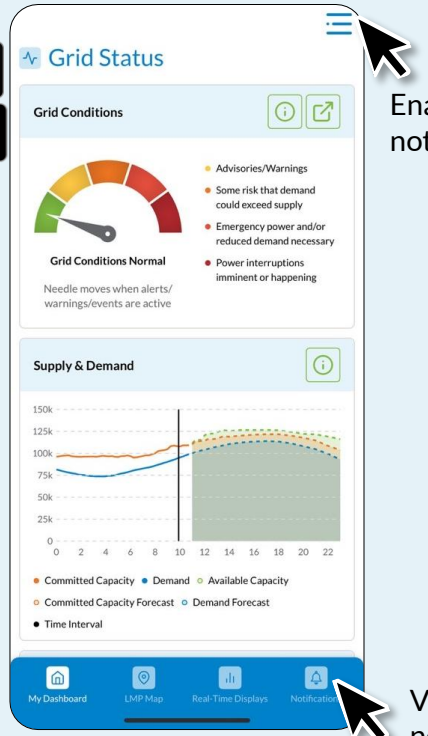
Grid Conditions Gauge
(Homepage)



Real-Time Operations Notifications
(Markets and Operations > Notifications > Real-Time Operations)
Login to subscribe to email notifications

MISO App

Download on the App Store
GET IT ON Google Play



Enable notifications

View notifications

Grid Conditions Gauge
(My Dashboard)

Real-Time Operations Notifications
(Notifications > Real-Time Operations)

Social Media

@MISO_energy

Midcontinent Independent System Operator (MISO)





Public Notifications on Website & Email

- Public declarations will include time and impacted region(s) and entity(ies)
- Notifications will be posted to the website and sent via the Real-Time Notification email list
- Operating instructions will be shared via Operator Interface only
  - Full and view-only access is managed by each LBA, TO or MP

Notification

Severe Weather Alert

04/04/2026 9:21 AM EST

MISO has issued a Severe Weather Alert due to High Winds and Heavy Rainfall.

Start Time: 04/04/2026 09:15 EST

End Time: 04/04/2026 20:00 EST

Affected Region(s):

- South Region - EES, CLEC, LAFA, SME, EAI, EMBA

This public notification is for awareness only. Impacted entities receive detailed instructions and information via the Operator Interface.

Visit https://help.misoenergy.org/ for more information

New Public Appeal Notification on Website & Email

MISO will issue separate notifications for Public Appeals. This action is at the discretion of the shift manager when in EEA2.

- Notifications will be posted to the website and sent via the Real-Time Notification email list

Notification

Public Appeal Notification

06/01/2026 7:17 AM EST

MISO has instructed the utilities listed below to issue a public appeal for electricity conservation due to reduced power supply and high demand.

Start Time: 06/01/2026 09:15 EST

Affected Region(s):

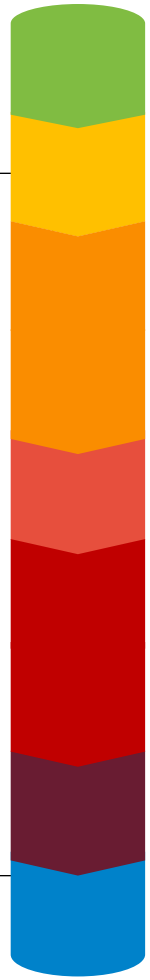
- North Region – DPC, GRE, MDU, MP, NSP, OTP, SMP

This public notification is for awareness only. Impacted entities receive detailed instructions and information via the Operator Interface.

Visit https://help.misoenergy.org/ for more information

The emergency operating procedures address adverse conditions by signaling conditions to MISO's members and allowing or requiring certain actions

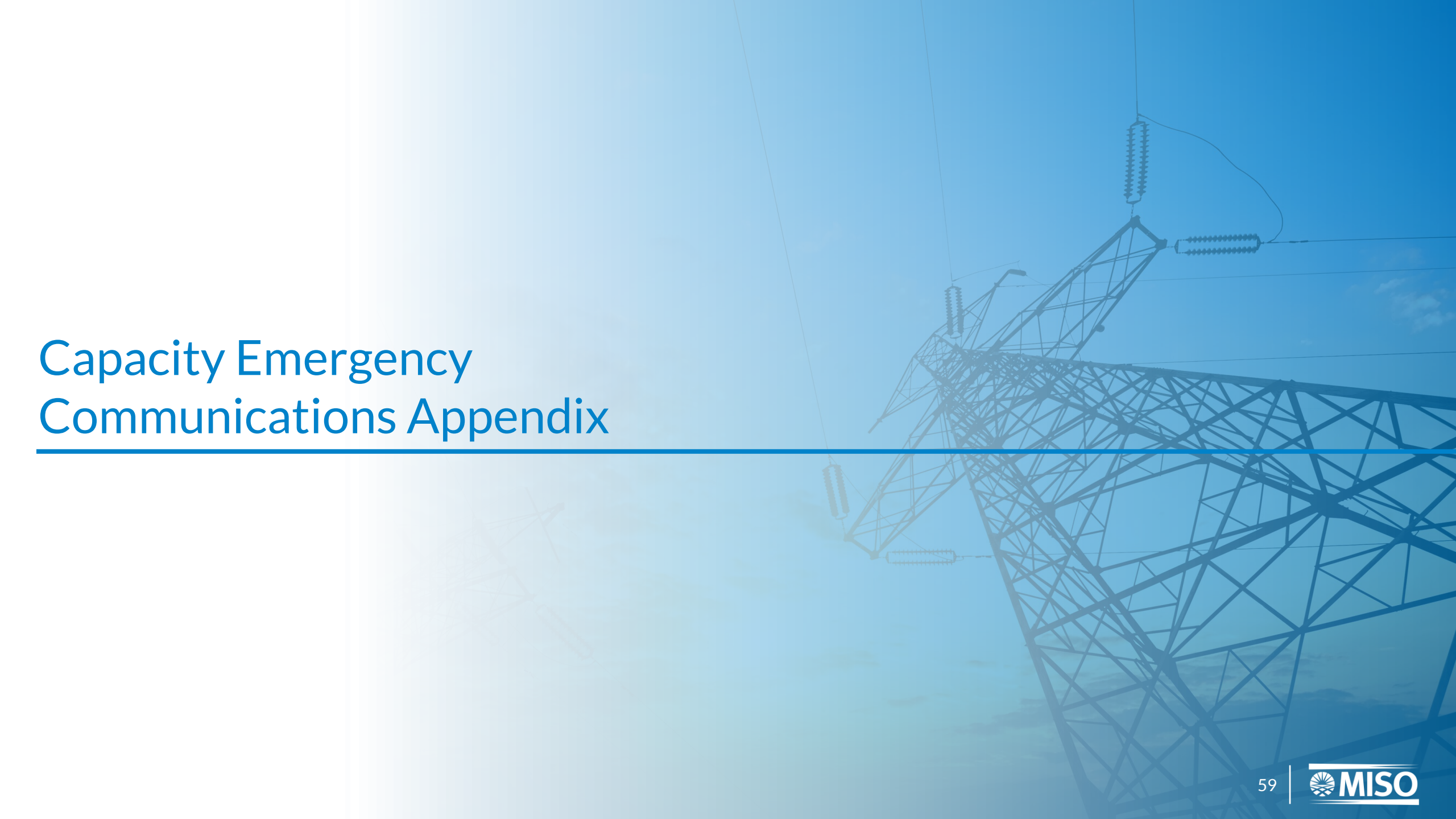
MARKET CAPACITY EMERGENCY PROCEDURE STEPS



Normal Operations		
Capacity Advisory	Advance notice of forecasted capacity shortage; request stakeholders update offer and market data; updated STR and STR RPE values; declare Conservative System Operations if conditions warrant	Normal Pricing
Warning	Request MPs/LBAs ensure accuracy of LMM/LMR availability and self-scheduled values; send LBAs LMM survey; commit available economic resources; coordinate reconfiguration with RCs/TOPs; schedule external/internal Module E resources; suspend CTS, evaluate TEC/inadvertent payback; curtail export schedules; request waivers; implement reconfiguration options; commit AME resources	Emergency Pricing Tier 1 Offer Floor
Event Step 1	Declare NERC EEA1; activate emergency limits	
Event Step 2	Declare NERC EEA2; implement LMRs, LMMs (Stage 1 or 2); commit EDRs; emergency energy purchases; public appeals; implement waivers; utilize operating reserves; implement CRSG reserve call; emergency reserve purchases	Emergency Pricing Tier 2 Offer Floor
Event Step 3	Declare NERC EEA3; firm load shed; set LMPs and MCPs to the VOLL	VOLL* Pricing
Termination	Terminate declarations and return to normal pricing	Normal Pricing

See appendix for definitions

Capacity Emergency Communications Appendix



Some declarations are *not* driven by capacity challenges

Transmission

Transmission Advisory

Notification of forecasted transmission system conditions that may adversely impact the BES but do not yet warrant a Conservative Operations declaration.

Load Pocket Advisory

Notification of potential capacity concerns within a load pocket where the loss of transmission into the area or generation in the load pocket could lead to additional reliability actions.

NEW

JUNE 1

Transmission Warning

Notification that system conditions present a credible risk to the BES, where mitigation actions are expected to be insufficient and more than 100 MW of load may be lost.

Transmission Emergency

Notification of actual or imminent IROL exceedance requiring immediate emergency actions to maintain BES reliability and prevent widespread impacts.

System Status Levels

Indicates infrastructure failures at MISO or MISO Member facilities

SSL 0 Low – Green

System status is normal. No adverse impacts

SSL 1 Elevated – Yellow

Short, minor impact to system, can be quickly remedied

Examples: Temporary infrastructure issue

SSL 2 High – Orange

Longer term, major impact to system, cause unknown

Examples: Loss of monitoring data or member infrastructure

SSL 3 Severe – Red

Major impact on MISO's ability to reliably operate system or market

Examples: Hardware failure, bomb threat, sabotage, control center evacuation

See Appendix for definitions

Notification for a capacity emergency (EEA) is different from a transmission emergency

Capacity Emergency



Occurs when there is not enough generation to meet demand

Typically linked to extreme weather (summer or winter peak)

Follows MISO's Maximum Generation and NERC's Energy Emergency Alert (EEA) process

Supported with various communications including advisories, declarations, EEA Alerts and website updates

Transmission Emergency



Occurs when there is an actual or imminent IROL violation on the transmission system

Happens very quickly with no public declarations

Requires corrective action within 30 minutes to maintain grid stability

Follows MISO's Transmission System Emergency process

See Appendix for definitions

Definitions

Contingency Reserves	A type of operating reserve that is held to address the loss of a significant generating unit or transmission line. At MISO, this is the sum of supplemental and spinning reserves.
Emergency Demand Response (EDR)	Load reductions, behind the meter generation, and other demand resources that are available to reduce demand or increase generation in exchange for guaranteed recovery of costs associated with the response in accordance with Schedule 30 (EDR Provisions) of the Tariff. EDRs are operated outside the Operator Interface (OI) by the shift manager by using the EDR Tool.
Energy Emergency Alert Level 1 (EEA1)	A NERC-mandated alert when all available generation resources are in use. It means MISO is experiencing conditions where all available generation resources are committed to meet firm load, firm transactions, and reserve commitments and is concerned about sustaining its required contingency reserves. Non-firm wholesale energy sales (other than those that are recallable to meet reserve requirements) have been curtailed.
Energy Emergency Alert Level 2 (EEA2)	A NERC-mandated alert when load management procedures are in effect. It means MISO is no longer able to provide its expected energy requirements and is an energy deficient. MISO has implemented its operating plans to mitigate emergencies and is still able to maintain minimum contingency reserve requirements.
Energy Emergency Alert Level 3 (EEA3)	A NERC-mandated alert when firm load interruption is imminent or in progress. It means MISO is unable to meet minimum contingency reserve requirements.
Interconnection Reliability Operation Limit (IROL)	A NERC System Operating Limit that, if violated, could lead to instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the Bulk Electric System.
Load Management Measures (LMM) Stage 1	Load management actions that can be taken to reduce demand to preserve or maintain operating reserves that are NOT included in EDRs or LMRs.
Load Management Measures (LMM) Stage 2	Load management actions that can be taken to reduce demand including voltage reductions and reducing loads that, by contract, cannot be interrupted until reserves are being or are expected to be depleted and energy from emergency offers by market participants are being or are expected to be depleted. These do NOT include EDRs or LMRs.
Load Modifying Resource (LMR)	These are either demand resources or behind-the-meter generation that have an obligation to reduce demand or increase generation during declared system emergencies
Maximum Generation Capacity Warning (Max Gen)	MISO foresees or is experiencing conditions where all available economic Resources are committed to meeting Load, firm transactions, and reserve requirements, and is concerned about sustaining required Operating Reserves.
Reserve Margin	The difference between total operating reserves and the operating reserve requirement. MISO is required to keep a certain reserve margin to ensure there is enough capacity to meet peak demand, plus a buffer.
Short-Term Reserve (STR)	A 30-minute rampable generation capacity product. It's designed to address short-term needs for managing system reliability.
Spinning Reserves	Reserves held that are synchronized to the system and available immediately.
Supplemental Reserves	Reserves for abnormal supply deficiencies that must be ready within 10 minutes.
System Operating Limit (SOL)	The NERC value (such as MW, Mvar, amperes, frequency or volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria.
Value of Lost Load (VOLL) Pricing	The price at which MISO values the cost of unserved energy; essentially, what customers would be willing to pay to avoid an outage.



202(c) Emergency Orders

Don Hunter, Manager, MISO Control Room Operations

Department of Energy 202(c) Orders

- Section 202(c) of the Federal Power Act (FPA)
  - Authorizes the Department of Energy (DOE) to issue emergency orders
    - Require power plants to remain in operation in lieu of retirement
    - Permit generators to exceed environmental operating limits
    - Direct backup generation facilities to run when EEA3 is imminent
  - MISO did not use 202(c) during Winter Storm Fern
    - Actions taken prior to use of the 202(c) sufficient to relieve capacity issues



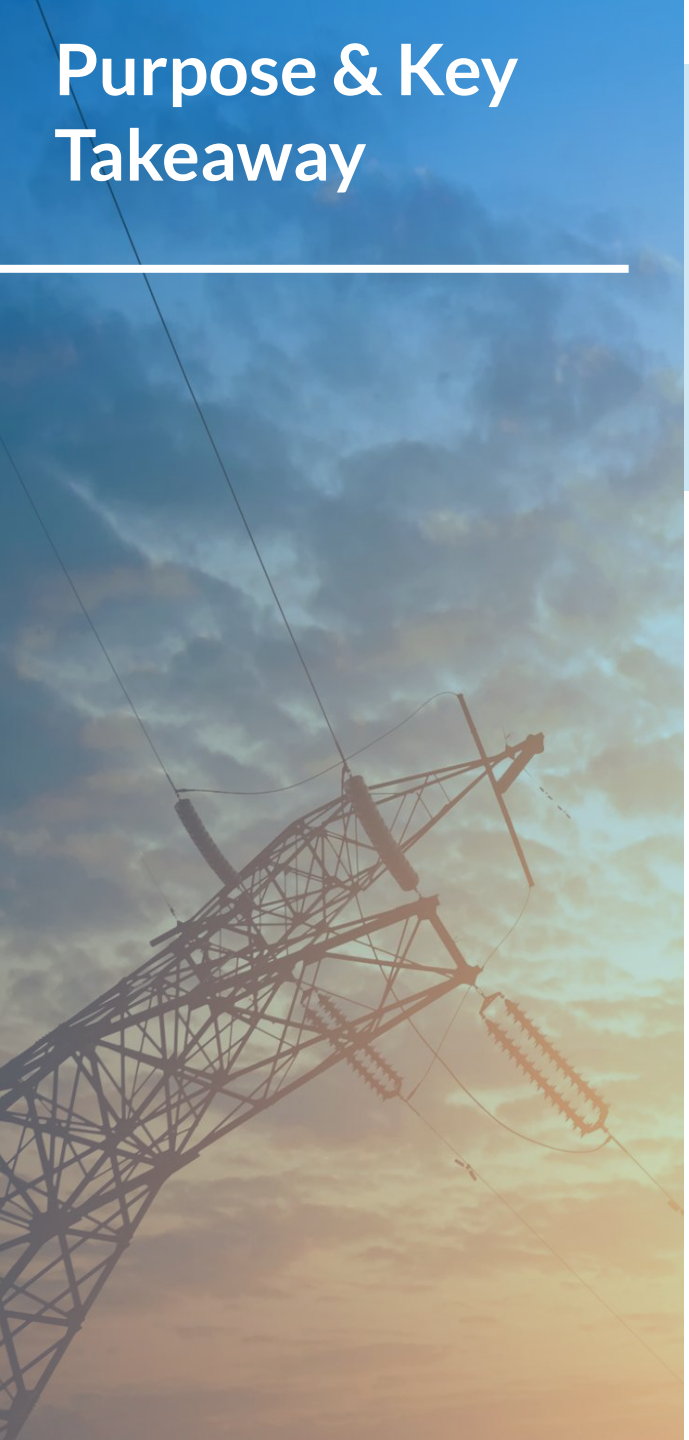
Contact: Don Hunter, dhunter@misoenergy.org



Transmission System Emergency Procedure Updates

Clayton Umlor, Manager, MISO Reliability Coordination

Purpose & Key Takeaway



Purpose

Communicate improvements coming to the Transmission System Emergency (TSE) procedure to enhance operational readiness.

Key Takeaways

- Transmission Warning declaration is a tool to communicate an increased level of transmission risk (internally & externally)
- Transmission System Emergency procedure updates are drafted and under review for inclusion of the Transmission Warning declaration to be effective June 1, 2026
- Future updates of the procedure will include clarifying criteria and responsibilities for identifying Transmission System Emergencies in both real-time and planning processes

Transmission Warning Entrance Criteria

Transmission Warning Declaration: Notification that system conditions present a credible risk to the BES, where mitigation actions are expected to be insufficient and more than 100 MW of load may be lost.

A transmission warning will be declared when…

ALL of the following conditions are met:

- There is 100 MW or more of load at risk
- Normal congestion management tools have been exhausted and are not sufficient to mitigate risk
- Available emergency actions are not sufficient to mitigate risk (e.g., emergency ranges of units, emergency only units, EDRs, and LMRs, etc.

AND

AT LEAST ONE of the following applies:

- Facilities > 100kV have post-contingent flow greater than or equal to 115% of the highest emergency limit
- The RC determines that system conditions warrant heightened awareness of potential transmission risk

Transmission Warning Exit Criteria

A transmission warning should be terminated when…

EITHER of the following conditions apply:

- The criteria for declaring the Transmission Warning are no longer satisfied
- RCs and TOPs agree that the risk no longer poses a significant threat to load shed or load loss

Timeline & Upcoming Procedure Updates



Transmission Warning: June 1



Criteria and responsibilities for defining Transmission System Emergencies and IROLs are currently being evaluated in the MISO stakeholder processes.



TSE procedure redline document will be posted and available for review.



TSE/IROL criteria & responsibility changes expected Q4 2026



Contact: Clayton Umlor, CUmlor@misoenergy.org



Technical Development & Training Updates

Anita Hurst, Sr. Manager, MISO Technical Development

MISO & Member Summer Readiness Training

Market Capacity Emergency Drill



- Review of recent procedural changes and escalation flow (rev 23 vs rev 24)
- Reinforces how procedure updates affect operational decisions and communications
- Practice applying revised steps of the updated MISO Market Capacity Emergency procedure (SO-P-EOP-11-002, rev 24)

Hurricane Drill



- Overview of 2025 season and vendor forecasts for 2026
- MISO and Member roles before landfall, during, and following a hurricane
- Three separate, simulated scenarios spanning one storm from pre-to-post-landfall; scenarios covered:
- Supply Surplus (Min Gen Event)
- Tool Failure (Loss of State Estimator)
- Restoration efforts (Including the islanding or generation facility, requiring use of blackstart resources)

MISO Operator Summer Readiness Training

Drill Participation

- MISO operators participate in Hurricane Drill and Market Capacity Emergency Drill

Interconnection Reliability Operating Limit (IROL) Simulation Training

- Define, identify, and mitigate System Operating Limits and IROLs
- Declare Transmission System Emergencies



Contact: Anita Hurst, ahurst@misoenergy.org

Thank you for joining us today!



BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 207
Konidena Sept. 2026 Decl.

Declaration of Rao Konidena

I, Rao Konidena, declare as follows:

I. Introduction

1. I am an electrical engineer and the principal of Rakon Energy LLC, an engineering firm that consults on energy markets such as the Midcontinent Independent System Operator (MISO).

2. I spent 15 years at MISO forecasting resource adequacy and working on policy matters, including in management and in public-facing roles. I have extensive experience on engineering and planning issues associated with distributed energy resources, storage, and transmission planning, advising state commissions, consumer advocates, and clean energy developers nationwide.

3. In my professional opinion, MISO's operating conditions during Summer 2026, do not support the Department of Energy's and Secretary Chris Wright's (DOE) claim of a shortage of electric energy or a shortage of facilities for the generation of electricity.

4. During Summer 2026, MISO maintained real-time operating reliability using its reliability operating procedures. MISO also experienced several capacity alerts and advisory declarations but only one event rose to the level of Step 2 – the July 15th event.

5. MISO experienced its tightest grid conditions during Summer 2026 on July 15. On that day, MISO declared a "Step 2" event. Even in those tight conditions, MISO had access to unused available capacity above the amount needed to both meet demand and maintain a buffer known as operating reserves requirements. Across the hours of the Step 2 event, I calculate that the surplus ranged from approximately 5,000 MW to over 8,500 MW.

6. MISO managed the Step 2 event using its established procedures. Among other things, MISO secured additional output from generators, used load-modifying resources, and obtained imports from neighbors. MISO's operations on July 15 performed as intended: MISO forecasted tightening conditions, employed its established procedures, and subsequently returned to normal operations.

7. I conclude that there is no evidence that MISO needed the capacity from the J.H. Campbell, Culley, and Schahfer plants to prevent a shortfall.

II. Education and Experience

8. My professional and educational experience is summarized in the curriculum vitae attached to this declaration (Attachment A).

9. I received a Bachelor of Engineering in Electrical and Electronics Engineering from Bangalore University, a Master of Science in Electrical Engineering from the University of Texas at Arlington, and a Master of Business Administration from the University of Minnesota.

10. I have more than two decades of experience in U.S. wholesale electricity markets, distribution system planning, and the integration of distributed energy resources. As Principal of Rakon Energy LLC, I have provided expert testimony before state commissions and FERC on issues involving resource adequacy, transmission planning, distributed energy resources, and energy storage. My clients have included retail customer aggregators, state attorneys general, generation developers, consumer advocates, and environmental organizations. Through this work, I have analyzed and advised on the implications of utility distribution system plans, distributed energy resource tariffs, interconnection rules, and the evolving seasonal capacity constructs of organized wholesale markets.

11. From 2003 to 2018, I served at MISO in roles ranging from resource forecasting to policy studies. At MISO, I led studies on demand response, energy efficiency, distributed generation potential, and grid-scale storage, as well as independent load forecasting and economic transmission planning. I represented MISO in national and international forums, including the Department of Energy's U.S. DRIVE technical team and the GO-15 group of global grid operators. This combination of independent consulting and ISO experience provides me with a deep understanding of how MISO's market structures, its planning processes, and its operational practices affect reliability, investment, and consumer costs.

III. Purpose of Declaration

12. I am familiar with DOE's Section 202(c) orders associated with the Campbell plant, including Order Nos. 202-26-22 and 202-26-39, as well as DOE's Section 202(c) orders associated with the Schahfer and Culley plants, including Order Nos. 202-26-29 and 202-26-30.

13. In addition, I am aware that the power plants subject to those orders have nameplate capacity as follows: Schahfer Units 17 and 18 (each approx. 361 MW); F.B. Culley Generating Station Unit 2 (approx. 90 MW); J.H. Campbell Unit 1 (approx. 265 MW), Unit 2 (approx. 379 MW), and Unit 3 (approx. 917 MW). I am also aware of basic operational details about the plants, including that Schahfer Unit 18 has not been operational this year.

14. The purpose of my declaration is to review the operating conditions MISO experienced on July 15 with a focus on evaluating the resources MISO had available to prevent any shortfall of generating resources on that day.

IV. Analysis

A. Summer 2026 Generally

15. Across Summer 2026, MISO maintained real-time operating reliability using its reliability operating procedures. MISO also declared Capacity Advisory[1] and/or

[1] The trigger for a Capacity Advisory declaration is "Capacity shortage is forecast within the next few days". Source: Slide 52, MISO May 6, 2026, presentation "Seasonal Readiness Workshop: Summer 2026"

Conservative Operations[2] — precursor declarations two tiers below a Step 1/EEA1 event — on four separate occasions for Conservative Operations[3] and six separate occasions for Capacity Advisory,[4] in June, July, and August. Several of the Conservative Operations were declared on the same date as Capacity Advisories,[5] and I followed MISO's convention and counted them as a single event.[6] On only one of those occasions, July 13–15, did conditions escalate beyond that precursor tier to an actual Max Gen Warning and Step 1/Step 2 event.

B. MISO Change in Procedures

16. Starting June 1, 2026, MISO consolidated the steps it takes to address tight grid conditions. Previously, MISO had gradients within each Step such as Step 2c within Step 2, and had five overall Steps all the way to Step 5 for EEA3. Now, MISO has Steps 1–3.[7] What were previously three steps for EEA2 events have been consolidated as one event.

C. MISO's Operations on July 15, 2026

17. To start this analysis, I have listed the stepwise events MISO declared for the North/Central subregion on July 15 below in a chronological manner, with times reported in Eastern Time.[8] MISO declared the stepwise events only in the North/Central subregion, not the South subregion.

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https://cdn.misoenergy.org/20260506%20Summer%20Readiness%20Workshop%20Presentation_UPDATED755608.pdf .

[2] The trigger for a Conservative Operations declaration is "Reliability issue possible for defined area (may be capacity-driven or caused by other abnormal circumstances)". Source: *Id.*

[3] The four dates are: 6/10, 6/17, 6/24, and 7/1. Source: MISO Monthly Operations Report for June, slide 2, found at https://cdn.misoenergy.org/202606%20Markets%20and%20Operations%20Report769996.pdf and MISO Monthly Operations Report for July, slide 2, found at https://cdn.misoenergy.org/202607%20Markets%20and%20Operations%20Report776924.pdf and MISO Real Time notifications for August found at https://www.misoenergy.org/markets-and-operations/notifications/.

[4] The six dates are: 6/8, 7/8, 8/9, 8/10, 8/19, and 8/28. Source: *Id.*

[5] For example, 6/8, 7/13, 8/9, 8/10, and 8/28.

[6] "If an event is escalated, then de-escalated, it should only count as a single event of the highest emergency declaration made" Source: "Read Me" tab in the spreadsheet posted for Demand Response (DR) and Load Modifying Resource (LMR) Reforms Workshop - August 24, 2026, available at https://cdn.misoenergy.org/20260824%20DR%20and%20LMR%20Reforms%20Workshop%20Historical%20Capacity%20Advisory%20and%20Max%20Gen%20Declaration%20Data777221.xlsx.

[7] Slide 49, MISO's presentation titled, "Seasonal Readiness Workshop: Summer 2026", on May 6, 2026, Summer Readiness Workshop, https://cdn.misoenergy.org/20260506%20Summer%20Readiness%20Workshop%20Presentation_UPDATED755608.pdf.

[8] Slide 10, MISO's presentation titled "July 15, 2026, Max Gen Event Review" on August 18, 2026, Reliability Sub Committee.

a. 00:00 to 14:00: Normal operations.
b. 14:00 to 16:00: MISO declared Step 1.
c. 16:00 to 17:30: MISO declared Step 2.
d. 17:30 to 17:52: MISO declared Step 1.
e. 17:52 to 23:59: Normal operations.

18. I assembled all the data as shown in the table below.

Table 1 - MISO North/Central Region - Total Capacity Minus Load Minus Operating Reserves[9]

Description	Step 1	Step 1	Step 2	Step 2	Step 1
Hour Ending ("HE")	HE 15:00	HE 16:00	HE 17:00	17:30	17:52
A - Real Time Actual Load	91,617	90,978	89,442	89,442	89,258
B - Operating Reserve Requirement (ORR)	2,750	2,750	2,750	2,750	2,750
C - Actual Load + ORR (*A* + *B*)	94,367	93,728	92,192	92,192	92,008
D - Real Time Gen Fuel Mix	79,627	79,640	77,859	77,859	76,968
E – Generators' Additional Output	500	500	500	500	
F – Imports from Neighboring Balancing Authorities	12,208	12,208	13,101	13,101	13,800
G – Internal Transfers (South --> North/Central)	1,025	1,023	1,121	1,254	1,207
H - Load Modifying Resources	2,000	2,000	3,000		
I – Short-Term Reserves	4,450	4,450	5,200	5,200	5,200
J - Total Capacity (*D*+*E*+*F*+*G*+*H*+*I*)	99,810	99,821	100,781	97,914	97,175
K - Total Capacity minus Load minus ORR (*J* - *C*)	5,444	6,094	8,589	5,721	5,167

19. Consider, for example, MISO's Step 2 at HE 17:00. As shown in Row C, to meet demand and maintain a reserve margin requirement, MISO needed at least 92,192 MW of available supply. In fact, MISO had 100,781 MW of available capacity, as shown in Row J. Thus, at this time, MISO had unused available capacity of 8,589 MW, as shown in Row K.

20. To conduct my analysis, I downloaded[10] MISO real time data for the entire July 15th date, including actual load, the generation fuel mix data, the net actual interchange data that

https://cdn.misoenergy.org/20260818%20RSC%20Item%2012%20July%2015%20Max%20Gen%20Event775901.pdf.

[9] All figures in rows A through K are in megawatts. HE refers to "hour ending." For instance, HE15:00 is the hour ending at 3:00PM Eastern.

[10] MISO Data Exchange, https://data-exchange.misoenergy.org.

shows how much power flowed from neighboring grid operators, and the amount of support that was flowing from MISO's South region to the North and Central region.

21. I supplemented this real time data for July 15th with the demand response data (called Load Modifying Resources) from MISO's presentations to the Market Subcommittee and Reliability Subcommittee. I used the most conservative figures from information published by MISO.[11]

22. I also downloaded the Multiday Operating Margin report available on MISO's website[12] to find how much operating reserves MISO needed per NERC's balancing authority reliability standard requirements. This amount was 2,750 MW for July 15th. I added this 2,750 MW to the real time actual load.

23. Additionally, I downloaded the Short Term Reserve (STR) requirements for 2026 summer,[13] to identify the short term reserves that applied to July 15th. STR was developed by MISO with stakeholders in 2020–21 to address market-wide, sub-regional, and local reliability needs not met by existing products;[14] while not created in response to a specific NERC directive, MISO's operating reserve and STR procurement practices support the balancing authority's compliance with NERC reliability standards. Per STR procurement practices MISO needed to maintain 4,450 MW during Hour Ending 15-16 and 5,200 MW during Hour Ending 17-21 for MISO North/Central region. I added the 4,450/5,200 MW amounts to the capacity side of the equation. Both the Multiday Operating Margin and Short Term Reserve requirements reports enabled me to compare how much capacity MISO had compared to the load plus operating reserve requirement during the Steps 1-2 hours (Hour Ending 15:00 – 17:52) on July 15th to meet NERC's reliability standards.

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[11] Slide 5 of the MISO Market Sub Committee presentation stated that LMRs were terminated at 16:36, but slide 10 of the MISO Reliability Sub Committee presentation stated that the LMRs were terminated at 16:45 EST. Slides 4–5, MISO's presentation titled "Review Market Outcomes for July 15 EEA 2" on August 20, 2026, Market Sub Committee, https://cdn.misoenergy.org/20260820%20MSC%20Item%2009%20Review%20Market%20Outcomes%20for%20July%2015th%20EEA2775968.pdf; Slides 5, 10, MISO's presentation titled "July 15, 2026, Max Gen Event Review" on August 18, 2026, Reliability Sub Committee. https://cdn.misoenergy.org/20260818%20RSC%20Item%2012%20July%2015%20Max%20Gen%20Event775901.pdf.

[12] Multiday Operating Margin Forecast report for July 15th published https://www.misoenergy.org/markets-and-operations/real-time--market-data/market-reports/#nt=%2FMarketReportType%3ASummary&t=10&p=0&s=MarketReportPublished&sd=desc.

[13] Seasonal STR Requirements spreadsheet found at https://cdn.misoenergy.org/Seasonal%20STR%20Requirements625749.xlsx (last updated July 31, 2026).

[14] MISO presentation "Short Term Reserve (STR) (MSC-2018-8) Post Implementation Analysis" January 19, 2023, https://cdn.misoenergy.org/20230119%20MSC%20Item%2008%20Short%20Term%20Reserves%20(MSC-2018-8)627536.pdf.

24. I now proceed to explain the source of those figures and provide additional context.

25. The generators' additional output (Table 1, Row E) available upon declaration of step 1 is the amount of output that generators can produce above ordinary economic maximum limits.[15] I estimate these values based on MISO's August 2026 presentation.[16]

26. MISO and its neighboring balancing areas regularly exchange power through imports and exports. Additionally, MISO has existing arrangements by which it can obtain supply from neighboring balancing areas when conditions are tight in MISO.[17] My source for the amount of supply available to MISO from neighboring balancing areas (Row F) is MISO data.[18] Notably, the values in Table 1 are actual real-time values, *i.e.*, megawatts that were physically flowing on the system during each hour. As such, these values constitute a floor on the amount of purchases available to MISO, and the actual amount available may have been greater.

27. MISO can also use internal transfers (Row G) to bring power from the South subregion to the North/Central subregion.[19] The MISO South subregion was in a position to support the MISO North/Central subregion because MISO declared Step 2 only in the North/Central subregion.

28. On July 15, MISO had access to a portfolio of Load Modifying Resources (LMRs) (Row H). Load Modifying Resources reduce demand through measures such as curtailing industrial process loads, reducing residential and commercial HVAC usage, and activating behind-the-meter generators. Load Modifying Resources provide significant flexibility to address tight system conditions.

29. MISO's total capacity minus the load minus the Operating Reserve Requirement (ORR) had fallen to a range of 1,000 – 1,200 MW in the late morning (HE 11–13), and MISO pre-positioned by declaring Step 1 at 10:12 AM for a forecast 14:00 start. This led to MISO accessing 500 MW of additional output from its generators, accessing 12,000 - 13,000 MW

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[15] See MISO Tariff definition of "Hourly Emergency Maximum Limit," available in Module A at https://www.misoenergy.org/legal/rules-manuals-and-agreements/tariff/.

[16] MISO August 2026 Market Subcommittee Presentation,

https://cdn.misoenergy.org/20260820%20MSC%20Item%2009%20Review%20Market%20Outcomes%20for%20July%2015th%20EEA2775968.pdf, at 4.

[17] Page 235 of 316, Energy and Operating Reserve Markets Business Practices Manual BPM-002-r26 Effective Date: SEP-30-2025.

[18] MISO Data Exchange API, Load-Generation-Interchange API, NAI by Adjacent BA endpoint, July 15 2026; negative=MISO export, positive=MISO import.

[19] Real-Time Intraregional Scheduled Flow data for July 15th, found at MISO -> Market Reports -> Real Time https://www.misoenergy.org/markets-and-operations/real-time--market-data/market-reports/#t=10&p=0&s=MarketReportPublished&sd=desc.

of imports from neighboring balancing authorities, and dispatching 2,000 - 3,000 MW of LMRs.

30. By the time Step 2 took effect (HE 17 00), MISO's surplus had grown to roughly 8,500 MW, driven by rising imports from neighboring balancing authorities (climbing to 13,101 MW), a 3,000 MW LMR deployment, and deploying short-term reserves — combined with load that had already begun declining during the preceding Step 1 hour and continued falling.

31. As imports kept rising and reached a record level, MISO terminated the LMR dispatch early (~16:36–16:45, still within HE 17 00) rather than completing the full planned deployment and continued releasing additional output from its generators, as conditions eased. The surplus settled back to roughly 5,000 MW by the time Step 1 was allowed to expire 17:52 EST, at which point MISO returned to normal operations.

32. Had MISO declared Step 3, operators would have had authority to deploy all spinning and supplemental reserves for energy.[20] MISO co-optimizes several reserve products — Spinning Reserves, Ramp Capability, Supplemental Reserves, and Short Term Reserves — but these products are nested: a megawatt clearing a faster product (such as Spinning Reserves, deployable within 10 minutes) also satisfies the requirements of slower products (such as Short Term Reserves (Table 1, Row I), deployable within 30 minutes). Because of this nesting, the total additional capacity available to MISO at Step 3 is best represented by the Short Term Reserve requirement, which encompasses all other reserve products.[21]

33. In summary, MISO had 5,000-8,000 MW of surplus during the July 15th Step 2 event above the amount needed to meet demand and maintain a reserve margin. Overall, this demonstrates that MISO's operations performed as required: they observed falling surplus, followed standard operating procedures, and accessed additional output from generators, imports from neighbors and dispatched LMRs, and subsequently returned to normal operations.

V. Conclusion

34. In conclusion, MISO had more than sufficient capacity to meet demand and maintain operating reserves on July 15, 2026. During the Summer 2026 as a whole, MISO experienced several capacity alerts and advisory declarations but only one event rose to

[20] "IMPLEMENT use of MISO's spinning and supplemental reserves, as needed and as time permits." Page 17 of 45, MISO Market Capacity Emergency SO-P-EOP-11-002 Rev: 25 Information Use Public (Aug. 24, 2026), https://cdn.misoenergy.org/SO-P-EOP-11-002%20Rev%2025%20MISO%20Market%20Capacity%20Emergency757883.pdf.

[21] Seasonal STR Requirements, *supra* note 13.

the level of Step 2 – the July 15th event. Even then, MISO had sufficient capacity to meet demand and maintain operating reserves.

35. Under these conditions, and based on the materials I have reviewed (including the materials referenced in DOE's orders), there is no evidence that MISO needed the capacity from J.H. Campbell, Culley, and Schahfer to prevent a shortfall during Summer 2026 generally or on July 15, 2026 specifically.

I declare under penalty of perjury under the laws of the United States, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

Executed on September 11, 2026, in Roseville, Minnesota.

Rao Konidena

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Rao Konidena
Rakon Energy LLC

Attachment A

RAO KONIDENA

ENERGY MARKET EXPERTISE IN DISTRIBUTED ENERGY RESOURCES

Roseville, MN 55113 Cell: 612-594-9257 · rkonidena76@gmail.com

Rao Konidena brings deep experience in distribution system planning and integration of distributed energy resources. His regulatory testimonies across the U.S. have informed utility distribution planning, storage deployment strategies, and DER tariff design. At MISO, Rao led studies on demand-side potential and DER impacts on long-term planning. His consulting work spans utility-scale and customer-sited solutions, with a consistent focus on how DERs shape the future of distribution systems.

Rao is on the Board of Ever Green Energy and President of the Board at the Center for Renewables Integration.

EXPERIENCE

RAKON ENERGY® LLC, Roseville, MN
President & Chief Executive Officer (CEO) May 2018 – Present

Testimonies filed before state regulatory agencies and related work.

- The Colorado Office of the Utility Consumer Advocate engaged Rakon Energy LLC to provide expert testimony before the Colorado Public Utilities Commission on a utility distribution system plan. Proceeding No. 24A-0547E Public Utilities Commission

- Engleman Fallon, PLLC engaged Rakon Energy LLC to provide expert testimony before the Federal Energy Regulatory Commission on behalf of the Kentucky Public Service Commission regarding a transmission cost allocation complaint. FERC Docket No. EL25-67-000. eLibrary | File List

- Citizens Utility Board and Environmental Defense Fund engaged Rakon Energy to provide testimony before the Illinois Commerce Commission (Docket No. 24-0088) in the Ameren Transmission Company of Illinois and Ameren Illinois Company d/b/a Ameren Illinois in the Joint Petition for a Certificate of Public Convenience and Necessity proceeding. https://icc.illinois.gov/docket/P2024-0088/documents/356793

- San Louis Obispo Mothers For Peace engaged Rakon Energy in the Application of Pacific Gas and Electric Company to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from September 1, 2023 through December 31, 2025 and for Approval of Planned Expenditure of 2025 Volumetric Performance Fees (U 39 E) docket before the California Public Utilities Commission Proceeding A.24-03-018. https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2403018/7629/537498256.pdf

- The Massachusetts Attorney General's Office, Office of Ratepayer Advocacy, engaged the Center for Renewables Integration to provide expert testimony before the Massachusetts Department of Public Utilities regarding Eversource (DPU 23-126), National Grid (DPU 23-115) and Unitil's (DPU 23-117) Energy Storage Tariffs. Rakon Energy is part of the Center for Renewables Integration expert witness team. https://eeaonline.eea.state ma.us/DPU/Fileroom/dockets/bynumber

- The Commonwealth of Pennsylvania's Office of Consumer Advocate engaged Rakon Energy LLC to provide expert testimony before the Pennsylvania Public Utilities Commission on a utility rate case. Docket No. R-2024-3047068 https://www.puc.pa.gov/pcdocs/1835234.pdf

- Rakon Energy is engaged on behalf of the Environmental Law & Policy Center and the Citizens Utility Board to provide testimony before the Illinois Commerce Commission (Docket No. P2023-0658) in the Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois - Joint Petition for a Certificate of Public Convenience and Necessity proceeding. https://icc.illinois.gov/docket/P2023-0658/documents/349330

- Rakon Energy is engaged by NC WARN, a nonprofit organization, for testimony before the North Carolina Utilities

Commission (Docket No. E-100, SUB 190) in Duke Energy Carolina Biennial Consolidated Carbon Plan and Integrated Resource Plan.
https://starw1.ncuc.gov/NCUC/ViewFile.aspx?Id=34aaef8f-5012-48aa-b319-77861e016436

- Rakon Energy was engaged by NC WARN, a nonprofit organization, for testimony before the North Carolina Utilities Commission (Docket No. E-7, SUB 1276) in Duke Energy Carolina Rate Case.
https://starw1.ncuc.gov/NCUC/ViewFile.aspx?Id=eff4d6f7-4a43-4c25-8784-2f5718375204

- The Office of People's Counsel in State of Maryland engaged Rakon Energy LLC to provide expert testimony before the Maryland Public Service Commission on a transmission line rebuild project. PSC Case No: 9698. Submitted date – September 13, 2023. https://webpsc.psc.state.md.us/DMS/case/9698

- San Louis Obispo Mothers For Peace engaged Rakon Energy in the Proposed Extension of the Diablo Canyon Power Plant docket before the California Public Utilities Commission Proceeding R.23-01-007.
https://mothersforpeace.org/wp-content/uploads/2023/07/Rao-Konidena-Testimony_Final.1.pdf

- Voltus, an aggregator, engaged Rakon Energy to provide expert testimony before the Minnesota Public Utilities Commission – Docket No. E999/CI-22-600 (Aggregator of Retail Customers), and Kansas Corporation Commission – Docket No. 23-EKCE-588-TAR (Demand Response Aggregator).
https://www.edockets.state mn.us/edockets/searchDocuments.do?method=showPoup&documentId={509C6C87-0000-C610-A629-18F8958B5C38}&documentTitle=20234-194648-01

  https://estar.kcc ks.gov/estar/ViewFile.aspx/S202307071819321214.pdf?Id=01c14579-4f44-42e7-887a-14381b43b514

- The Commonwealth of Pennsylvania's Office of Consumer Advocate engaged Rakon Energy LLC to provide expert testimony before the Pennsylvania Public Utilities Commission on a transmission line rebuild project. Docket No. A-2022-3037374. Starting on Page 198, https://www.puc.pa.gov/pcdocs/1797979.pdf

- The Commonwealth of Pennsylvania's Office of Consumer Advocate engaged Rakon Energy LLC to support OCA's response to the questions posed by the Pennsylvania Public Utility Commission's Secretary in the policy proceeding - Utilization of Storage Resources as Electric Distribution Assets. Docket No. M-2020-3022877. Starting on Page 18, https://www.puc.pa.gov/pcdocs/1726077.pdf

- A prominent solar advocacy group – Vote Solar, engaged Rao for expert testimony work in Nevada and Minnesota IOUs IRP filing. The docket # for Minnesota PUC is Docket No. E002/RP-19-368 and the docket #s for Public Utilities Commission of Nevada PUC are Docket Nos. 21-06001 and 21-06002.

  For Nevada testimony,
https://ecms.nv.gov/puc/api/Document/ATczlezYGwl0gYI%C3%81kEPTWEapPcfzukJf8jLWbk0n4gatA%C3%81WwN8OhaGK%C3%81Y%C3%89J4njfgfyQKShz62MTaictAWaf3PsA%3D/?OverlayMode=View

  For Minnesota PUC testimony - Starting Page 110, https://votesolar.org/wp-content/uploads/2021/02/XcelMNIRP2021.pdf

- He has provided expert testimony support for Environmental Law and Policy Center (ELPC) at the Public Service Commission of Wisconsin (PSCW) on the MISO Multi-Value Project (MVP) line in Wisconsin. Docket No. 5-CE-146. https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=365126

- He provided affidavit support for the Office of the People's Counsel of the District of Columbia (OPC-DC) at the Federal Energy Regulatory Commission (FERC) on PJM's Reserves Pricing Proposal and municipal utilities in Wisconsin and Missouri at FERC on MISO's Resource Adequacy construct. Starting Page 177,
https://edocket.dcpsc.org/apis/api/filing/download?attachId=100991&guidFileName=ae06faca-5aa9-43f2-aea4-dc5457ab7adb.pdf

- Rao also submitted an affidavit before FERC on behalf of Missouri Joint Municipal Electric Utilities Commission, Missouri River Energy Services, and WPPI Energy regarding the Midcontinent Independent System Operator's (MISO) External Resource Zone proposal. Docket No. ER18-1173-001.
https://elibrary ferc.gov/eLibrary/filelist?accession_number=20180626-5242&optimized=false

Providing consulting services related to Federal and state energy policies, focusing on energy storage and distributed energy resources.

- Rakon Energy, as part of the Center for Renewables Integration team, is supporting a renewable energy developer to look at the MISO and PJM generator interconnection queue for solar/storage site evaluation.
- Rakon Energy is supporting a solar developer to evaluate distributed energy and battery energy storage system (BESS) development opportunities in MISO.
- Rakon Energy supported a Community Solar Garden developer with MISO's DER Affected Systems Study process.
- Rakon Energy is engaged as a Battery Energy Storage System consultant to the Georgia Public Service Commission.
- An Independent Power Producer engaged Rakon's services to understand MISO's seasonal resource adequacy construct and its impact on Power Purchase Agreement negotiations with a MISO utility.
- A renewable energy developer engaged Rakon Energy to provide MISO expertise for their renewable energy project portfolio in various stages and study cycles of the Generator Interconnection Queue and the capacity credit impact from MISO's seasonal capacity construct.
- An aggregator engaged Rakon Energy as part of the team to represent their interests at RTO stakeholder committees on FERC Order 2222.
- Advanced Energy Economy and the Natural Resources Defense Council's Sustainable FERC Project engaged Rakon to monitor MISO's FERC Order 2222 implementation process.
- Rakon Energy was part of the team engaged by a technology company to represent their interests at the PJM RTO. Another similar company hired Rao to navigate MISO's market rules for data center interconnection.
- Rakon Energy provides generic electrical engineering expertise for the Commonwealth of Pennsylvania's Office of Consumer Advocate in the transmission, distribution services and miscellaneous electric issues.
- He provided training as part of the Tuatara team on DERs to Colombia's grid operator XM and the ESTA International team on energy storage benefits to Mexican regulator CRE.
- He provided advocacy support for Energy Storage Association (ESA) at MISO on FERC Order 841 Compliance.

Advisor, Volunteer, Pro-Bono assignments

- Rao presented on US Energy Markets, Capacity Markets and Retail Energy Markets to Independent Electricity Market Operator Philippines (IEMOP) and other stakeholders, as part of a workshop organized by the United States Energy Agency (USEA).
- Rao presented on Distributed Energy Resources (DER) and peer-reviewed Demand Side Management and DER plans for Central American regulators, as part of NARUC International Peer Review.
- Rao presented and shared best practices around the impact of provisioning ancillary services. At an Eastern Africa regional workshop organized by the United States Energy Agency (USEA), the United States Agency for International Development (USAID) and the Power Africa initiative.

MIDCONTINENT INDEPENDENT SYSTEM OPERATOR (MISO), Eagan, MN
Principal Advisor, Policy Studies Aug 2015 – May 2018

- Recognized as an expert on all thing's energy storage and distributed energy resources from an economic transmission planning perspective
- Project manager for long term independent load forecast and demand response/energy efficiency/distributed generation potential study.
- MISO representative on Department of Energy (DOE) US DRIVE Grid Interaction Technical Team

Senior Manager, Transmission Asset Management Operations Feb 2013 – July 2015

- He engaged the division lead in the development of strategic initiatives and operating plans.
- Rao chaired the Economic Modeling Framework Working Group of international Grid operators GO-15.

Manager, Resource Forecasting (started at Engineer II) Sep 2003 – Jan 2013

- ***Main Accomplishments***
  - In this role, I directed the Demand Response & Energy Efficiency potential study for MISO, with the support of Global Energy Partners consultants.
  - Directed the MISO Energy Storage Study identifying the economic potential for grid-scale energy storage in MISO footprint, providing strategic consulting services to investor-owned utilities, public power utilities, asset owners, and investors.
- ***Regulatory Experience***
  - Responsible for analytical assessments that meet MISO's Federal Energy regulatory compliance obligations as well

as our Transmission Owners (e.g., FERC Market-based rates).
- Responsible for supporting state regulators and MISO Board of Directors with technical analysis related to policy drivers.

PWRSOLUTIONS, Inc., Dallas, TX (Consulting) May 2001 – August 2003
Student Intern and Electrical Engineer
- Rao executed generator interconnection studies for Independent Power Producers (IPPs) clients.
- Analyzed future generator and transmission needs in the Eastern Interconnection.

EDUCATION

THE UNIVERSITY OF MINNESOTA, Minneapolis, Minnesota
Carlson School of Management
Master of Business Administration, Global Executive Program May 2011
Emphases: Strategic Management, International Business

- Responsible for all financial aspects of marketing mobile charging services for Electric vehicles in the Singapore market.

UNIVERSITY OF TEXAS AT ARLINGTON, Arlington, Texas
Energy Systems Research Center (ESRC)
Master of Science in **Electrical Engineering** May 2002

- Master's Thesis in Economic Analysis of Distributed Generation (Photovoltaics (P.V.) and Fuel Cells)

BLOG POSTING, PUBLICATIONS & PRESENTATIONS

1. Co-Author for a graduate level textbook titled "Modern Electricity Systems: Engineering, Operations, and Policy to address Human and Environmental Needs". Release date - August 2022 with Wiley.
2. **He has authored multiple publications in Electricity Journal, Renewable Energy World (blog), and other peer-reviewed industry journals.**

BOARD & VOLUNTEER ACTIVITIES

- Board of Directors, Ever Green Energy. Sep 2019 – present
- President, Board of Directors, Center for Renewables Integration. Dec 2023 - present.

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 208
MISO ERAS Cycle 5 Release

MISO accelerates new generation and storage projects with fifth ERAS cycle

7.3 GW of proposed capacity will strengthen reliability and meet growing demand

For Immediate Release

September 8, 2026

Media Contact

McKenzie Barbknecht

CARMEL, Ind. — MISO is accelerating its efforts to help bring new generation online quickly with the fifth cycle of projects to be evaluated under the Expedited Resource Addition Study (ERAS) process. These projects will reinforce reliability and support economic growth across the region.

This cycle includes 15 proposed projects totaling approximately 7.3 gigawatts (GW) of new capacity. The portfolio spans MISO's North, Central and South regions and includes a mix of natural gas, solar, wind and battery storage resources that are expected to be in service by 2029.

"The MISO region is undergoing rapid change, with electricity demand rising at a historic rate," said Aubrey Johnson, MISO's Vice President of System Planning and Competitive Transmission. "Each ERAS cycle is helping us to bring reliability critical generation online faster while we work toward long-term improvements in the interconnection process."

The fifth study cycle will include the following ERAS projects:

- Bayou Point Combined Cycle (NextEra Energy Capital Holdings) – 750 megawatts (MW) of new gas generation in Louisiana

- Calcasieu Parish Combined Cycle (Entergy Louisiana) – 767.7 MW of new gas generation in Louisiana
- Crosley Energy Storage (NextEra Energy Capital Holdings) – 400 MW of new battery storage in Indiana
- DOUBLEC Energy Center (DOUBLEC Energy Center LLC) – 400 MW of new solar generation and 400 MW of new battery storage in Arkansas
- Little Rock Wind Project (Little Rock Wind Project LLC) – 300 MW of new wind generation in Minnesota
- Malden Battery Energy Storage System (NIPSCO) – 600 MW of new battery storage in Indiana
- Merom Energy Storage (NextEra Energy Capital Holdings) – 500 MW of new battery storage in Indiana
- Point Coupee Combined Cycle (Entergy Louisiana) – 377 MW of new gas generation in Louisiana
- Rapides Parish Combined Cycle (Cleco Power) – 756 MW of new gas generation in Louisiana
- Sandcut Energy Storage (NextEra Energy Capital Holdings) – 350 MW of new battery storage in Indiana
- Steamboat Energy Storage (NextEra Energy Capital Holdings) – 500 MW of new battery storage in Louisiana
- Sullivan County Combined Cycle (Maple Creek Energy) – 641.8 MW of new natural gas generation in Indiana
- Tradewater Energy Storage (NextEra Energy Capital Holdings) – 155 MW of new battery storage in Kentucky
- Trotman Energy Center (Trotman Energy Center LLC) – 400 MW of new gas generation in Indiana

Since the launch of the ERAS program, 58 projects representing nearly 29 GW of proposed capacity have been or will be studied. Of these, 38 projects representing approximately 18 GW of proposed capacity have advanced to completed generator interconnection agreements, with an additional 5 projects representing approximately 3 GW of proposed capacity nearing completion. The program is capped at 68 projects and will sunset in 2027.

###

MEDIA CONTACT:
McKenzie Barbknecht

About MISO

Midcontinent Independent System Operator (MISO) is an independent, not-for-profit organization that delivers safe, cost-effective electric power across 15 U.S. states and the Canadian province of Manitoba. 45 million people depend on MISO to generate and transmit the right amount of electricity every minute of every day. MISO is committed to reliable, nondiscriminatory operation of the bulk power transmission system and collaborating with all stakeholders to create cost-effective and

innovative solutions for our changing industry. MISO operates one of the world's largest energy markets with more than $53 billion in annual gross market energy transactions.

News Release Link

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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
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Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 209
NERC 2026 SOR Assessment Overview

NERC

2026 State of Reliability

Assessment Overview of 2025 Bulk Power System Performance

June 24, 2026

2026 SOR Snapshot

2026 SOR Technical Assessment

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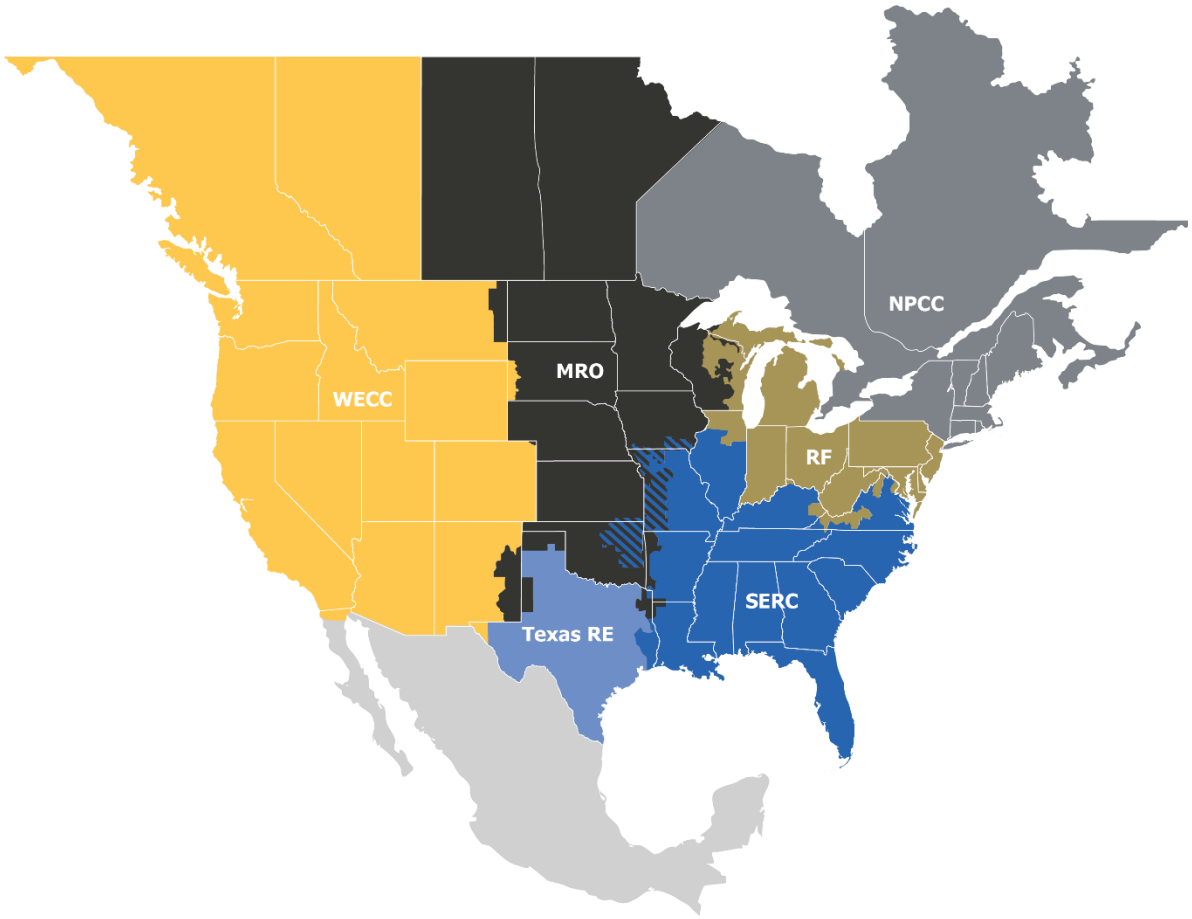
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Preface

Electricity powers our modern life and is the bedrock of our economic wellbeing. The Electric Reliability Organization (ERO) Enterprise—comprised of NERC and the six Regional Entities—is firmly committed to assuring a highly reliable, resilient, and secure bulk power system (BPS) in North America. The ERO Enterprise enables collaborative engagement with industry, regulators, and stakeholders, embracing innovation and supporting the needs of nearly 400 million people.

RELIABILITY | RESILIENCE | SECURITY
POWERING TODAY. PROTECTING TOMORROW.

The North American BPS is made up of six Regional Entities as shown on the map and in the corresponding table below. The multicolored area denotes overlap as some load-serving entities participate in one Regional Entity while associated Transmission Owners/Operators participate in another.



MRO	Midwest Reliability Organization
NPCC	Northeast Power Coordinating Council
RF	ReliabilityFirst
SERC	SERC Reliability Corporation
Texas RE	Texas Reliability Entity
WECC	WECC

About This Overview

NERC delivers the *State of Reliability* (SOR) as a two-part report that consists of the *2026 SOR Overview* and the *2026 SOR Technical Assessment*.[1] The *2026 SOR Overview* serves as a high-level summary of the most important and actionable topics impacting the BPS and how they are being addressed, while the *2026 SOR Technical Assessment* provides NERC's comprehensive annual analytical review of BPS reliability for the 2025 calendar year. The analysis within the SOR report fulfills a key role in NERC's mission by providing an unbiased, data-driven look at the BPS's reliability, identifying ongoing challenges, and informing future-looking assessments. This overview seeks to inform regulators, policymakers, and industry leaders of the most significant reliability risks facing the BPS and describes the actions that the ERO Enterprise has taken, and will take, to address them.

Development Process

ERO staff developed this overview and the corresponding *2026 SOR Technical Assessment* with support from the Performance Analysis Subcommittee (PAS). Both documents draw conclusions from an established set of reliability indicators and mandatory information reported by industry to the Transmission Availability Data System (TADS), the Generating Availability Data System (GADS), the Misoperation Information Data Analysis System (MIDAS), voluntary reporting into the Event Analysis Management System (TEAMS), Bulk Power System Awareness monitoring and processes, the Institute of Electrical and Electronics Engineers (IEEE) Distribution Reliability Working Group, and other sources as available.

Considerations

- Data in the SOR represents the performance for the January–December 2025 operating year unless otherwise noted.
- Analysis in this report is based on data from 2021–2025 that was available in Spring 2026 and provides a basis to evaluate 2025 performance relative to performance from the last five years. All dates and times shown are in Coordinated Universal Time (UTC).
- The SOR is a review of industry-wide trends—not a review of the performance of individual entities.
- When analysis is presented by Interconnection, the Québec Interconnection is combined with the Eastern Interconnection unless specific analysis for the Québec Interconnection is shown.

[1] NERC SOR 2026 Technical Assessment

Executive Summary

The North American BPS continues to deliver reliable electric service under increasingly challenging conditions. Key performance indicators remain stable overall even as the system experiences rising demand growth, more frequent extreme weather events, and significantly higher penetrations of inverter-based resources (IBR).

At the same time, the report highlights a critical shift in the nature of reliability risk. Many of the emerging concerns facing the system are no longer driven by single contingencies or localized disturbances but by correlated and system-wide stresses, including energy limitations, operational challenges associated with maintaining reliability in lower-inertia systems, and declining availability of aging combustion generation. Although fuel supply uncertainty and extreme weather exposure were not major drivers in this year's assessment, they remain subject to ongoing monitoring given their continuing potential to affect reliability. The findings emphasize that continued reliability success will depend not only on maintaining infrastructure and resource adequacy but also on improving industry's ability to anticipate, model, and manage these evolving risks before they manifest as reliability events.

While the SOR focuses on historical occurrences in the past year, it is also important to recognize future resource adequacy concerns. NERC's forward-looking *Long-Term Reliability Assessment*[2] and related non-NERC reports[3] continue to highlight that generation development has not and is not expected to keep pace with needs as new projects face delays and cancellations due to supply chain constraints, changing economies, and increasing grid upgrade costs. Similarly, while existing transmission performance continues to improve, its development, particularly of major interstate lines, is not advancing at a pace that can adequately support future reliability needs.

Reliability Indicators

Table 1 provides an overview of key performance measures of the BPS that compares 2025 performance to the previous four years. The results show that while a majority of these measures continue to improve or remain stable, several indicators are identified for monitoring or further attention, highlighting areas that warrant industry focus. The table is intended to contextualize known and emerging trends and areas of operational focus to help stakeholders understand where reliability risks may be evolving or re-emerging as the grid continues to transform.

[2] Long-Term Reliability Assessments
[3] MISO *2026 Reliability Imperative Report*

Table 1: Reliability Indicators[4]			
Improving	**Stable**	**Monitor**	**Actionable**
Frequency Response: Eastern, Texas, and Western Interconnections	**Frequency Response:** Québec Interconnection	**Winter Reserve Margin:** NPCC Maritimes	**Inertia and Rate-of-Change-of-Frequency:** Québec Interconnection[5]
Inertia and Rate-of-Change-of-Frequency: Eastern, Texas, and Western Interconnections	**Protection System Misoperations Rate**	**Transmission-Related Events Resulting in Loss of Load:** Supported by Event Analysis Data	
Energy Emergency Alerts	**Transmission Outages Caused by Failed Protection System Equipment:** AC Circuits	**Interconnection Reliability Operating Limit (IROL) Exceedance**	
Transmission Outages Caused by Failed Protection System Equipment: Transformers	**Automatic AC Transmission Outages Caused by Failed AC Substation Equipment:** AC Circuits	**Transmission Outages Caused by Failed AC Substation Equipment:** Transformers	
Automatic Transmission Outage Events Involving Human Error: AC Circuits and Transformers	**Transmission Element Availability:** AC Circuits	**Transmission Element Availability:** Transformers	
Transmission Outages Caused by Failed AC Circuit Equipment	**Transmission Outage Severity**		
	Transmission Physical Security Metric		

Emerging Trends

While the BPS remains reliable and continues to perform well operationally, underlying reliability risk is increasing and changing in nature; the margin for error continues to decrease while dependence on operational mitigations increases.

NERC's analysis in the SOR report also identifies several important emerging trends:

1. **Conventional generation forced outage rates are up.**
   The report identifies a meaningful increase in conventional generator forced outage rates in 2025, with annual weighted equivalent forced outage rates (WEFOR) increasing to 9.2% compared to historical norms rarely exceeding 8%. Coal and combined-cycle units were the primary drivers of this increase with an increase of over 39.8 TWh and 19.1 TWh of unavailable energy year over year, respectively. In contrast to recent years' generation challenges, operational performance during the

[4] Some metrics are evaluated for multiple sub-topics. These metrics are either listed multiple times, with the different sub-topics beneath the bolded metric name (e.g. different interconnections for Frequency Response), or the criteria driving the overall status is listed (e.g. NPCC Maritimes causing Winter Reserve Margin to have the Monitor status).

[5] The Québec Interconnection has been experiencing low hydraulicity conditions since 2023. In 2025, this resulted in reduced energy exports and increased energy imports. Therefore, fewer hydro generating units were synchronized within the Interconnection, particularly under summer light-load conditions, leading to lower system inertia during this period. These conditions have been cyclical historically and are expected to improve in the coming years.

most challenging winter week of 2025[6] improved as industry winterization efforts continued. Instead, the reduction in availability was distributed throughout the year, suggesting a broader baseline degradation in much of the coal and combined-cycle fleets' performance.

2. **Demand growth and large load integration continue challenging operators.**
   Projected annual energy demand rose to nearly 4.95 million GWh in 2025, while actual summer peak demand in several areas approached or exceeded the normal forecast. Data center and computational loads continued emerging as a major reliability consideration due to their scale, speed of development, and unique operational characteristics. In 2025, two instances of data center customer-initiated load reduction (CILR) exceeded 1,000 MWs, with many more exceeding 100 MWs. NERC continued to work with the electric and data center industries to issue new alerts, host technical conferences, perform standards work, and offer large load guidance activities, reflecting the growing importance of load modeling, operational coordination, and frequency response impacts associated with these rapidly growing loads.

3. **Resource mix transformation is fundamentally changing system operations and reliability management.**
   Solar, wind, and battery energy storage systems (BESS), all IBRs, continued to expand rapidly in 2025, with BESS growth approximately matching solar growth. In several peak demand periods, solar and/or wind production materially exceeded planning assumptions and supported system operations during stressed conditions. Additionally, BESS continued to demonstrate the capability to provide rapid frequency response. At the same time, IBRs are increasing operational complexity associated with inertia, protection systems, dynamic performance, and disturbance response. NERC continued extensive IBR mitigation work in 2025 and early 2026, including new technical requirements related to IBR performance, ride-through capability, and model validation.

4. **Industry mitigation actions are tracking well in many foundational reliability areas.**
   The *2026 SOR Technical Assessment* also documents continued improvement in several important controllable reliability metrics, including overall transmission system outage severity, protection system misoperations, failed protection-system-related outages, and transmission-related loss-of-load events.

[6] Comparisons across winter storm events should be interpreted with caution, as outage risk remains elevated and storm impacts vary significantly by the area impacted, duration, system condition, and event severity.

Conventional Generation Forced Outage Rates Up

Forced outage performance is a foundational indicator of BPS reliability because it illustrates the ability of generating resources to perform daily as well as when they are most needed, during periods of high demand, stressed system conditions, and extreme weather. While reserve margins and accredited capacity metrics provide a static view of resource sufficiency, an analysis of year-over-year forced outage rate changes provides insights into the availability of the conventional resource fleet, revealing trends in outage behavior and emerging reliability vulnerabilities.

Analysis of 2025 Weighted Equivalent Forced Outage Rate

Our 2025 analysis of the conventional GADS[7] revealed an increase in reported units' annual WEFOR[8] to 9.2%, which is higher than the historical norms of 7–8% (see **Figure 2**). This increase was not the result of any particular event but an increase distributed across most months throughout the year, with three months' WEFORs being comparable to the months when winter storms Elliott and Uri occurred. The lack of specific major events is indicative of a more subtle baseline increase in conventional forced outage rates. This, combined with tightening reserve margins[9] in some areas that have continued into 2025 from prior years—as well as performance improvements during the most challenging winter week of the year (January 19–25), highlighted by NERC, the Federal Energy Regulatory Commission (FERC), and industry—emphasizes the overall operational improvements while underscoring the increasingly precarious position of the BPS. As WEFOR increases, planning reserve margins may also increase at a higher rate to accommodate the associated uncertainty[10] (see **Figure 1**).[11]

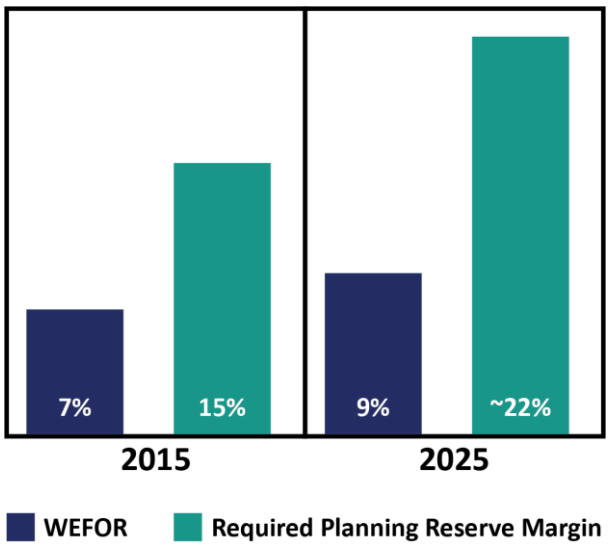


Figure 1: Conceptual Example of Forced Outage Rates Impacting Reserves

[7] GADS reporting is mandatory for units with a capacity >20 MW owned by NERC-registered Generator Owners (GO) per Section 1600 of NERC's Rules of Procedure. The conventional data set is separate from wind, solar, and hybrid energy storage data collection. Standalone energy storage is not currently collected by NERC under a Section 1600 data request.

[8] GADS Data Reporting Instructions - Appendix F Equations - WEFOR is an equation used throughout the electric industry to assess generator reliability by looking at how much units' time and generating capacity is reduced due to forced outages and derates relative to the amount of time they could be generating, weighting that value by each units' net maximum capacity.

[9] Reserve margins refer to the amount of excess generation an area is required to have available as a contingency for major system events to reduce the likelihood of cascading blackouts and load shedding. They are also key to NERC's Reliability Assessments' ability to forecast adequate generation.

[10] Many factors impact reserve margin calculations and vary from season to season throughout the year. Higher impact drivers include forced outage rates, planned maintenance rates, load forecasts, extreme weather outage adders, resource fleet composition, variable energy performance, and resource age.

[11] Figure is for demonstrative purposes. Proportions are not perfectly representative to actual value relations.

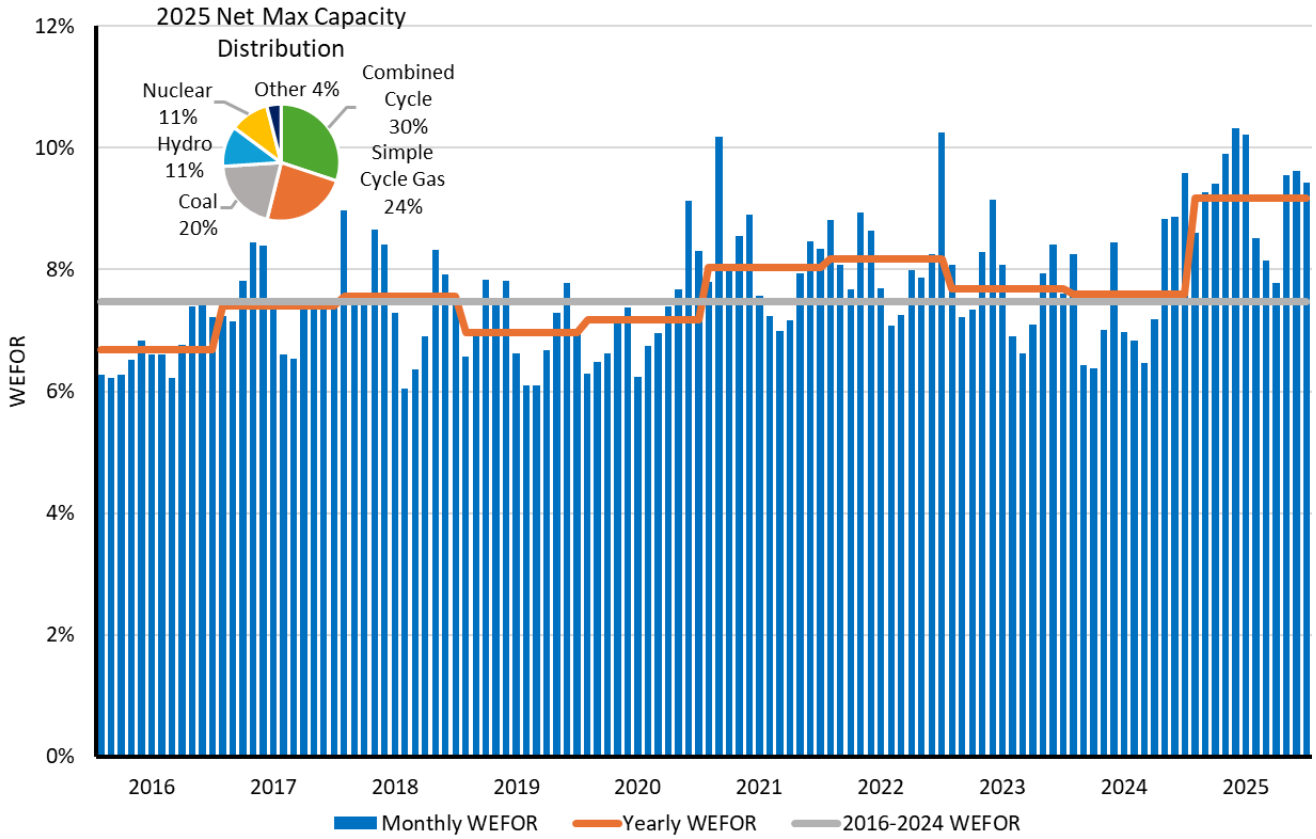


Figure 2: Monthly, Annual, and Five-Year WEFOR

Further analysis (see **Table 2**) identified that the increase in unavailability was primarily driven by a variety of combustion-based generators. The largest year-over-year increases in TWh of unavailability were observed in coal (39.8 TWh increase from 2024 to 2025) and combined-cycle units (19.1 TWh increase from 2024 to 2025). Combining this information with each type of unit's installed net maximum capacity and WEFOR identifies coal-fueled generators as being of more concern than others.

Table 2: 2024 vs. 2025 Year-Over-Year Forced Unavailability Comparison

Primary Fuel Type	Change in GWh[12]	2024 WEFOR	2025 WEFOR
Gas - Steam Turbine	8,772	19.2%	22.4%
Gas - Simple Cycle Combustion Turbine	5,938	20.7%	22.8%
Gas - Simple Cycle w/Heat Recovery Steam Generator (HRSG)	-203	7.7%	7.0%
Combined Cycle	19,154	4.2%	5.7%
Coal	39,835	11.2%	14.1%
Oil - Steam Turbine	1,857	24.6%	25.6%
Oil - Combustion Turbine	2,427	48.2%	69.4%
Hydro	-3,171	8.4%	7.7%
Nuclear	-3,862	2.7%	2.2%
Other	-2,308	11.1%	8.4%
Total/Overall	68,440	7.6%	9.2%

[12] Measured by WEFOR numerator:
$\sum(([Forced\ Outage\ Hours] + [Equivalent\ Forced\ Derate\ Hours]) * [Net\ Maximum\ Capacity])$

To identify possible commonalities, the owners of 41 generators that had a year-over-year increase of at least 1 TWh[13] of unavailability were asked to voluntarily provide additional context to their 2025 GADS data by NERC and the Regional Entities. Of those contacted, responses for 26 generators were provided, which identified several key insights to drive further investigation:

- Sixteen of the units experienced equipment destruction extensive enough to significantly prolong their 2025 outage(s).
- Eight of the units indicated that supply chain constraints significantly prolonged their 2025 outage(s).
  - Constraints were all indicated as occurring at the manufacturer; however, constraints may have occurred deeper into the supply chain unknown to the Generator Owner (GO).
  - Constraints identified included being unable to obtain materials for the repairs, challenges locating part specifications, inexperienced project management, and lack of staff to perform the work.
- Six of the units indicated complete or partial turbine blade release or vibration, which, upon further inspection, would have likely resulted in eventual release.
- Multiple units[14] leveraged the forced outage downtime to perform additional maintenance and inspections. Some indicated that these actions also extended the duration of the outage(s) but resulted in future benefits by either functionally moving up scheduled outages or identifying opportunities to prevent future outages.

After entity responses were evaluated, cause code components were also evaluated by an approximated MWh of forced capacity reduction since 2016. The largest groups were then trended to identify which ones had the largest and/or most consistent increases, with the following component groups being identified:

- **Catastrophe:** Increases over prior year in 2017, 2020, and 2024
  - Largely driven by an increase in use in 2020 because of COVID-19. NERC directed reporters to utilize this code for outages relating to the pandemic at that time prior to the addition of a more appropriate cause code.
  - 2017 and 2024 increases were higher than usual but would not have warranted inclusion on their own.
- **Turbines (High, Intermediate, and Low Pressure):** Increases over prior year in 2017, 2020, 2023, and 2025
  - All three individual turbine component groups were independently identified and represent the largest, most consistently increasing group if combined.
- **Regulatory:** Increases over prior year in 2017, 2018, 2019, 2022, 2023, and 2025
  - Most consistently increasing component group.
  - Initial analysis did not indicate any alignment with a particular policy objective, with both decreases and increases throughout various governmental phases.

[13] Year-over-year variation in MWhs of unavailable generation was used intentionally used in lieu of WEFOR or a single year's MWhs of unavailable generation. This was to focus on units that experienced issues starting in or shortly before 2025 and were most impactful to the overall annual WEFOR. A cutoff was applied to limit overall industry burden and receive a processable amount of input given the timeframe while also being a large enough group to identify common issues. The exact 1 TWh amount provided a clean cut point with a sufficient population but was ultimately arbitrary.

[14] Because this specific information was not directly requested and this is a common industry practice, an exact number of units is not available.

- **Safety:** Increases over prior year in 2018, 2020, 2022, and 2025
- **Nox Reduction Systems:** Increases over prior year in 2017, 2018, 2022, and 2025
- **Boiler Fuel Supply to Bunker:** Increases over prior year in 2017, 2020, 2022, 2024, and 2025

Further data analysis of these component groups and investigation into the underlying cause codes and submitted verbal descriptions are necessary.

The results of this analysis align with, but do not prove, industry assertions concerning coal and combined-cycle units. Most large coal units are over 40 years old and are expected to be retired in the relatively near future. These large coal and combined-cycle units were not designed for regular cycling, which has become an operational requirement in some areas and a necessity to maintain economic viability in others. These factors compound to increase the likelihood of failure over time and act to reduce the incentive to prioritize expensive restoration. Recent Federal Power Act section 202(c) emergency energy orders requested through the Department of Energy (DOE) have also received mixed reception among GOs. These mandates do improve system capacity, but that capacity may not be from reliable units.

Related Actions

Recommendations

- NERC will pursue further analysis and collaborate with the GADS user group (GADSUG) to better understand the causes driving this increase in WEFOR.
- NERC will work with industry to develop specific, measurable reliability indicators for generation performance.
- NERC and the relevant stakeholders should consider adjusting or at least be prepared to adjust reserve requirements to account for lower conventional generation availability.
- GOs should consider bolstering turbine inspection procedures at required intervals. GOs should also consider performing these inspections more frequently or when other major maintenance/outages provide the opportunity.
- Regulators should consider implementing alternative operating requirements during energy emergencies to ensure that regulations do not hinder BPS reliability during critical periods.
- GOs should ensure that manufacturers have capability and plan to replace major components in the event of failure.
- Manufacturers should consider immediately increasing the number of trained technical maintenance personnel to bolster expertise due to the increasing frequency of outages involving major equipment failure and the lack of adequate or sufficiently experienced staff, which was cited multiple times.
- Manufacturers should verify material procurement and processing capabilities.

Demand Growth and Large Load Integration Challenges Continue

Recent events involving data centers and cryptocurrency mining facilities continue to demonstrate the importance of improving industry's understanding of these loads' characteristics and risks as well as the considerations and mitigations needed to reliably integrate them into the BPS.

In a February 2025 event in the Eastern Interconnection, 1,800 MW of data center CILR occurred due to a transmission fault. An additional Eastern Interconnection event in February 2025 resulted in 428 MW of data center CILR. Similar Eastern Interconnection events were observed in March 2025 (227 MW of data center CILR), May 2025 (540 MW of data center CILR), and June 2025 (1,300 MW of data center CILR). ERCOT continues to experience cryptocurrency mining facility CILR events with nine events occurring in 2025 in which at least 100 MW of CILR occurred from computational load facilities.[15] **Figure 3** provides a summary of the Eastern Interconnection and ERCOT data center and cryptocurrency mining facility events.

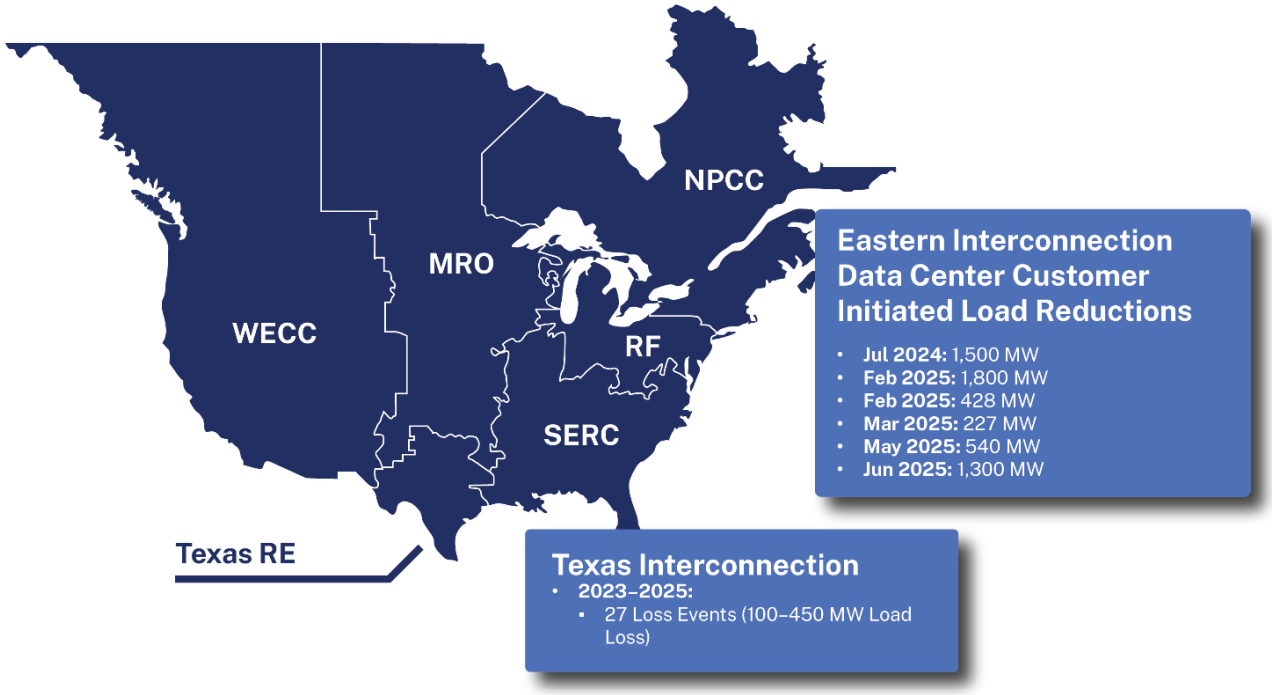


Figure 3: Customer-Initiated Load Reduction Events

Figure 4 provides a breakdown of the large CILRs tracked in ERCOT since 2023. Compared to 2023, the number of events in 2024 and 2025 increased, without indicating improvement. Most events were large computational load events; however, several non-computational load events did occur.

[15] See the Incident Review: Considering Voltage-Sensitive Crypto Load Reductions for an analysis of cryptocurrency mining facility ride-through events in ERCOT.

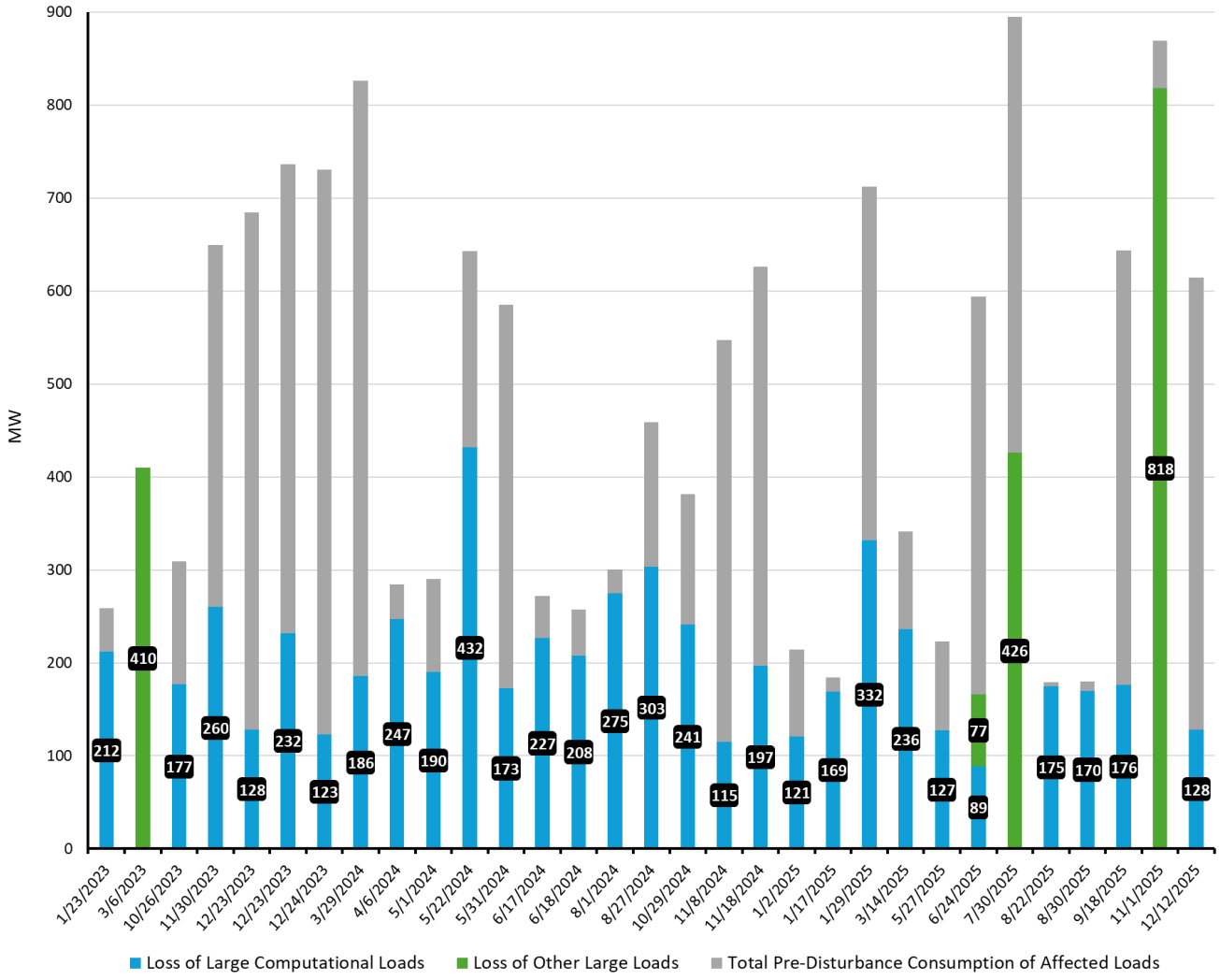


Figure 4: ERCOT Large Load Ride-Through Events

These events demonstrate that the reliability challenges from large loads will increase as these facilities become more prevalent on the grid. As the size of individual large load facilities increases and if large load facilities are located near one another, the sizes of these large load events will likely increase. This could lead to measurable frequency or voltage stability issues. It remains important for grid planners and operators to understand and study the expected performance of the large load facilities during grid disturbances. For the reliability risks to be studied and addressed, load models and study practices that reflect the behavior of the large loads and the risks to the BPS are essential. Continued collaboration between large load facility owners and operators as well as grid planners and operators is essential to ensure the reliable operation of the BPS.

Related Actions

Existing and Ongoing Efforts

- NERC developed a Large Loads Action Plan to address the BPS risks related to emerging large loads.[16]
- The Large Loads Working Group (LLWG) continues to provide technical guidance, industry collaboration, and reliability risk assessment and monitoring for the increasing integration of large loads. The LLWG has published the following white papers and reliability guideline:

[16] Large Loads Action Plan

- A white paper discussing the characteristics of emerging large loads and the risks they pose to the BPS[17]
- A white paper discussing the gaps in NERC Reliability Standards and industry practices related to emerging large loads[18]
- A reliability guideline providing industry with the best practices for mitigating BPS risks related to emerging large loads[19]

- The Load Modeling Working Group (LMWG) continues to address gaps in modeling the dynamic characteristics of the emerging large loads. The LMWG's activities include the following:
  - Developed a technical reference guide for industry on modeling data centers for transient stability studies
  - Endorsed and continues to improve a performance model called Power Electronic Reconnecting and Ceasing (PERC1) for modeling data centers in 2025
  - Continues to educate industry with workshops and by developing tools to help industry develop useful data center models, such as a data center questionnaire[20]
- NERC issued a Level 2 Industry Recommendation Alert to address risks related to large loads.[21]
- Additionally, NERC issued a Level 3 Essential Actions Alert providing specific actions deemed essential to address BPS risks posed by computational large loads,[22] including the following:
  - Transmission Planners and Planning Coordinators developing requirements for computational load modeling data, settings, and parameters
  - Transmission Planners and Planning Coordinators focusing on computational load impacts in system studies
  - Planning Coordinators updating their qualified change definition to reflect the changes that can occur to computational loads
  - Transmission Operators establishing a commissioning process that ensures operational readiness for the integration of large loads
  - Transmission Planners and Planning Coordinators implementing actions to ensure that non-consequential loss of firm computational load does not occur for typically cleared faults
  - Transmission Owners taking actions to capture and share fault recording data for computational load facilities
  - Transmission Operators, Reliability Coordinators, and Balancing Authorities establishing interpersonal communication capabilities and joint operating procedures with computational loads as well as issuing operating instructions to prevent Bulk Electric System (BES) emergencies
- NERC hosted a technical conference focused on the BPS risks posed by emerging large loads and the mitigations needed to integrate emerging large loads into the BPS.[23]

[17] Characteristics and Risks of Emerging Large Loads
[18] NERC LLWG White Paper - Assessment of Gaps
[19] Risk Mitigation for Emerging Large Loads
[20] Data Center Information Collection Questionnaire
[21] Large Load Interconnection, Study, Commissioning, and Operations
[22] Level 3 Computational Load Alert
[23] 02-24-26 Emerging Large Loads Technical Conference

- NERC posted draft updates to the NERC Rules of Procedure for establishing a new registered entity for computational load entities. Additionally, the NERC Standards Committee has launched a standards project to develop Reliability Standards that address the risks posed by computational loads.
- The frequency response metric will continue to be monitored to measure the response to frequency events during large load tripping events.

Recommendations

- The following recommendations are discussed in the LLWG white papers:[24]
  - Registered entities should coordinate with large load entities to address the risks posed by emerging large loads.
  - Relevant NERC Reliability and Security Technical Committee (RSTC) subgroups (including the LLWG, the LMWG, the Security Working Group, and the System Protection and Control Working Group) should continue to assess and address the risks posed by emerging large loads.
  - Regulators should work with utilities to address the risks posed by emerging large loads.
  - Policymakers should review interactions between interconnection requirements, existing state regulations and planning processes, and regional grid operator requirements. Additionally, policymakers should review requirements for large load customers to provide operational data and information to Transmission Owners (TO), Transmission Operators (TOP), Transmission Planners (TP), and other entities.
- NERC registered entities should implement the recommendations provided in the Level 2 Industry Recommendation Alert and the Level 3 Essential Actions Alert.[25]
- NERC will continue incident analysis and lessons learned and share findings with industry.
  - NERC will consider the necessity of mandatory data collection requirements.
- Communication and coordination with the Electric Power Research Institution (EPRI), the Energy Systems Integration Group (ESIG), large load industry groups, and the electric industry at large should be continued.

[24] Characteristics and Risks of Emerging Large Loads, NERC LLWG White Paper - Assessment of Gaps
[25] Large Load Interconnection, Study, Commissioning, and Operations, Level 3 Computational Load Alert

Resource Mix Transformation

The BPS and BES continue to experience a rapid resource mix transformation as conventional generation retirements continue to be replaced primarily by natural gas and increasing IBR penetration. This reduction in conventional resource diversity and increased reliance on variable energy resources continued to pose risks and challenge grid operations in 2025. Additionally, the magnitude of BESS helping to smooth solar generation coming on-line in the morning and going off-line in the evening has increased, with installed capacity roughly matching solar additions last year.

IBR Reliability Considerations

As detailed in NERC's *2025 SOR Overview*,[26] IBR reliability risks remain a priority as these resources continue to grow across the BPS. The primary concern is that some IBRs have unexpectedly reduced or ceased output in response to normally occurring grid disturbances, including generator faults, then rapidly resume output within minutes. These events are driven by a combination of ride-through performance limitations, inverter and plant-level controls, protection systems, and modeling quality deficiencies. Following several major IBR-driven disturbances since 2017, NERC has pursued numerous activities to mitigate related reliability concerns.[27] The *2025 SOR* identified continued unexpected IBR output reductions following normally occurring system disturbances with four events four events exceeding 500 MW reported in 2024 and 16 such events reported since 2020.

Available operational data in 2025 suggests improvements in several key areas. Industry participation in model validation and disturbance review activities increased substantially following implementation of the alert recommendations. While no major widespread disturbance events associated with previously observed common-mode IBR tripping mechanisms were identified during the assessment period, there was a loss of 1,132 MW due to sub-synchronous oscillation protection tripping generation off, a failure mode previously unobserved at this scale. Additionally, rapidly increasing IBR penetration continues to increase operational complexity, particularly in regions experiencing reduced inertia, high renewable penetration during light-load conditions, or rapidly changing power flow conditions. Throughout 2025 and the first half of 2026, several additional major efforts have been undertaken and/or completed as highlighted below.

IBR-Related Actions

Existing and Ongoing Efforts

Level 3 Alert[28]

NERC issued *Level 3 Alert: Essential Actions for Inverter-Based Resource (IBR) Performance and Modeling* to TOs, TPs, Planning Coordinators (PC), and currently registered GOs to enhance technical minimum requirements, study processes, and improve modeling to mitigate risks posed by IBR performance during system disturbances.

- **Essential Action #1**: Each TO and TP, in coordination with their PC, should enhance the existing criteria and policies in their generator interconnection and planning activities, respectively, with additional technical details and IBR-specific performance criteria. These performance-based factors help ensure uniform IBR performance both in normal and post-disturbance operations and include reactive power control, frequency response control, ride-through behavior and post-disturbance performance, and full use of reactive power capability.

[26] 2025 NERC State of Reliability - Overview
[27] Quick Reference Guide: Inverter-Based Resource Activities
[28] NERC Level 3 Alert: Essential Actions for Inverter-Based Resource (IBR) Performance and Modeling

- **Essential Action #2**: Each TP and PC should enhance their modeling and study practices to ensure that sufficient study work and model quality verification are performed and documented to reflect models that are representative of installed, or to-be installed, equipment by establishing model quality and accuracy criteria as well as model performance tests and conformity criteria and by enhancing existing criteria used throughout the generator interconnection.
- **Essential Action #3**: TOs, TPs, or PCs should perform a detailed review of currently operating IBRs on their systems to understand the extent of condition of both real-world performance and accuracy of their models.
- **Essential Action #4**: Each GO should create and implement processes to help ensure that the models used for the evaluation of their design and submitted to TPs and PCs for use in generator interconnection and planning processes are accurate and high-fidelity representations of their IBRs.

To follow up on the Level 3 Alert, the ERO has developed an outreach strategy for 2026 to gather information about why entities are not adopting essential actions or are reporting substandard performance expectations and to address legitimate challenges through clarification of essential actions or, where appropriate, through regulatory processes.

New Standards

Significant reliability gaps associated with modeling are addressed by the updated MOD standards finalized in 2025: MOD-026-2,[29] MOD-032-2,[30] and MOD-033-2.[31] Model validation and verification requirements in MOD-026-2 improve model accuracy and documentation. Enhancements in MOD-032-2 help ensure that validated and verified models are collected and used for both local reliability studies and Interconnection-wide case creation. Improvements in MOD-033-2 allow PCs to assess individual generator performance against their model behaviors as part of system model validation efforts and to remedy discrepancies through MOD-032-2 processes.

Inverter-Based Resource Subcommittee and Electromagnetic Transient Modeling Working Group

The Inverter-Based Resource Subcommittee (IRPS) and Electromagnetic Transient Modeling Working Group (EMTWG) continue to develop reliability guidelines and white papers to share best practices among industry to further reduce IBR risks associated with modeling, studies, commissioning, and testing. Many of these risks can be traced back to poor commissioning and testing of IBRs before they enter commercial operation. These gaps are addressed in the *Draft Reliability Guideline: IBR Commissioning Best Practices*[32] and an upcoming white paper, *IBR Equipment EMT Model Validation*, which aims to provide model validation acceptance criteria, thereby complementing model validation requirements in MOD-026-2 and closing risks posed by inaccurate models.

Category 2 Generator Owner Registration[33]

On May 18, 2023, FERC issued an order approving the NERC Work Plan filed on February 15, 2023, as amended on March 13, 2023, to address registration of IBRs that are connected to the BPS but not within NERC's definition of the BES (referred to hereafter as "Category 2 GO/GOP"). The ERO Enterprise has identified and communicated with 531 IBR facilities that meet the Category 2 GO/Generator Operator (GOP) registry criteria across all the Regional Entities and are, or planned to be, interconnected as of May 15, 2026.

[29] MOD-026-2
[30] MOD-032-2
[31] MOD-033-3 – Further revisions have been implemented in 2026.
[32] Draft Reliability Guideline: Commissioning Best Practices
[33] NERC Files IBR Registration Update, Marking Milestone for Grid Reliability

Beginning on May 15, 2026, entities with identified IBR facilities that meet the Category 2 GO/GOP registry criteria were registered and are now subject to compliance with applicable Reliability Standards, as required by the IBR Order. As part of the Inverter-Based Resource Registration Initiative, NERC staff developed a document identifying the finalized and pending compliance dates for the applicability and enforceability of Reliability Standards applicable to Category 2 GO and GOP registrations. As of May 15, 2026, entities registered as Category 2 GOs or Category 2 GOPs are required to comply with, as applicable, BAL-001-TRE, IRO-010-5, MOD-032-2, PRC-012-2, PRC-017-1, TOP-003-6.1, VAR-001-5, and VAR-002-4.1.

Additional technical conferences will be pursued to assist in identifying which Reliability Standards must be revised to establish applicability to Category 2 IBRs and in which order and grouping they should be developed.

The ERO Enterprise is integrating the new Category 2 GO and GOP registrants into relevant ERO Enterprise efforts, including Compliance Monitoring and Enforcement Program activities related to Reliability Standards applicable to those entities. The ERO Enterprise will continue to identify and register additional entities that meet the Category 2 GO and GOP registry criteria as additional IBR facilities are developed and connected to the BPS.

The completion of the NERC Work Plan represents the conclusion of a substantial three-year ERO Enterprise effort to address the risk to BPS reliability posed by unregistered IBR facilities.

BESS Reliability Considerations

As the BES resource mix continues to rapidly evolve, BESS penetration has rapidly increased over the past several years (see **Figure 5**) to approximately match solar growth in 2025. This growth is projected to continue, requiring observation and analysis of this resource's capabilities.

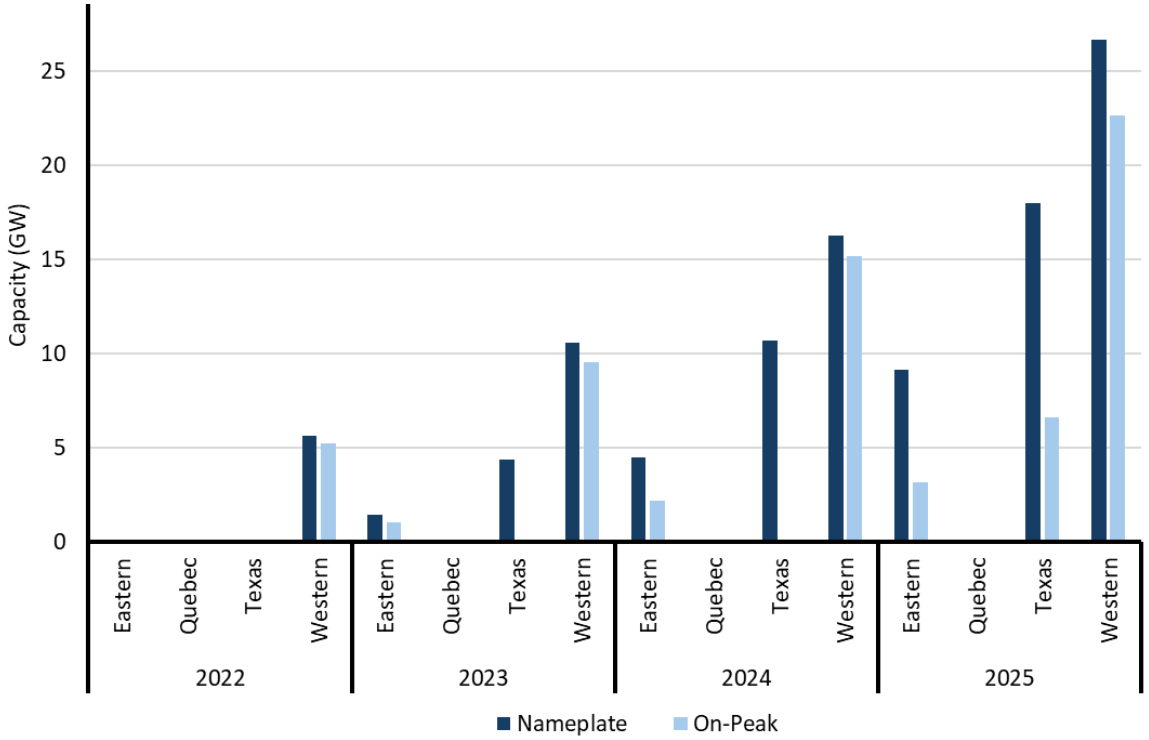


Figure 5: 2022–2025 Battery and Hybrid Capacity by Interconnection

Unique Failure Event

In January 2025, a 300 MW BESS facility experienced thermal runaway during routine testing that ultimately resulted in the functional destruction of a previous-generation warehouse-style facility.[34] While outages internal to the plant regularly occur with other generation resources of similar or greater capacities, the permanent, unplanned loss of a non-BESS facility is exceedingly rare. As such, this type of failure represents a risk consideration unique to BESS that needs to be taken into consideration as the resource continues to expand. Improvements to BESS reliability, thermal runaway mitigation, failure isolation, fire suppression, and updates to fire codes have all acted to significantly reduce the likelihood of these events occurring. NERC will continue to monitor these failure events, but they do not represent a significant concern to overall system reliability at this time.

Load Curve Smoothing

BESS is typically installed to take advantage of price differences between high-generation/low-load and low-generation/high-load conditions. As a result, it provides a smoothing effect that functionally reduces expected and unexpected variability from increasingly prevalent wind and solar generation (see **Figure 6**).

As a result, conventional generators have more time to come off-line and on-line during the most strenuous portions of the day in areas most impacted by as the period when solar resources are going off-line just before peak load conditions in the evening. Because many older, larger conventional generators were not designed to cycle on- and off-line daily, increasing the ramp period can reduce wear and tear, improving their reliability.

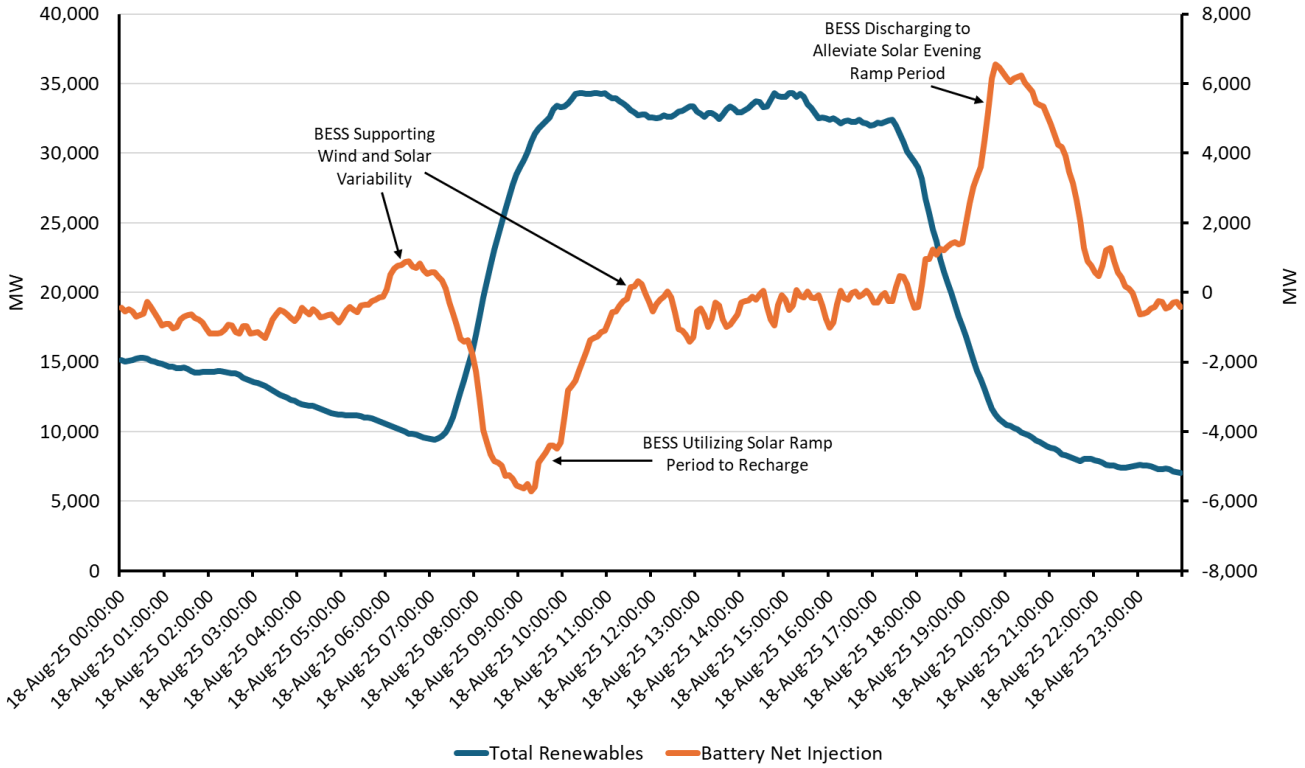


Figure 6: Total Renewables Plus Evening Solar Ramp[35]

[34] Moss Landing BESS Fire Report Final 12.22.25.pdf

[35] Secondary Y-axis has been shifted and scaled for visual clarity.

Frequency Response Impacts

As detailed earlier in the *2025 SOR Overview*,[36] BESS has demonstrated the capability to rapidly respond to frequency disturbances. In 2025, areas with sufficiently dense BESS installations and primary frequency response support initiatives continued to demonstrate the resource's ability to arrest frequency decline and restore frequency to deadband more quickly than conventional generators.

It should be noted that BESS are energy storage resources with limited capacity, typically intended to last a few hours. As a result, BESS's role in frequency disturbance events is ultimately to rapidly recover and maintain frequency until additional resources can come on-line for indefinite system support. This introduces a functional limitation during long-term widespread system degradation events, meaning that BESS is not a complete solution for events like major winter storms.

BESS-Related Actions

Recommendations

- BESS data collection and sharing value and viability are being evaluated by NERC's Performance Analysis team.
- NERC encourages BESS facilities to provide information on services that they are providing with relevant parties.
- NERC encourages policymakers to consider revisions to fire codes if they have not already.
- NERC will continue to monitor BESS performance and major events for risks.
- In November 2025, ERCOT stakeholders approved Nodal Operating Guide Revision Request 272 and Planning Guide Revision Request 121. These revisions require new BESS resources with a standard generation interconnection agreement (SGIA) date on or after April 1, 2026, to demonstrate the capability of providing advanced grid-support (grid-forming) functions as well as to provide appropriate models for these functions.

[36] 2025 NERC State of Reliability - Overview

Industry Mitigation Actions

Performance data reported to NERC enables a risk-based approach to reliability management across major emerging reliability issues prior to the creation of formal reliability indicators. Current areas of focus include severe weather, conventional generator performance, large loads, BESS, and IBRs (see **Table 3**). In response to these evolving risks, industry and the ERO Enterprise implemented a broad range of mitigation activities throughout 2025 detailed in the body of this report.

In addition to these top priorities, more cautionary mitigation activities included more conservative operating practices during stressed and cold-weather conditions, increased use of probabilistic and all-hours reliability assessments, improved model validation requirements, transmission planning resilience analysis for extreme weather events, and new planning and operational guidance associated with load-pocket reliability risks.

Table 3: Monitoring Emerging Trends and Mitigation Resolution

Monitored Reliability Challenge	Key Measures Tracked	2025 Trends	Mitigation Effectiveness Indicators	Indicators that Additional Attention is Required
Increasing Incidence of Severe Weather	Severity risk index (SRI), transmission outages, restoration duration, MVA-days lost, load loss	Worst SRI days remained within historically favorable ranges; overall weather conditions considered favorable	Reduced outage severity, faster restoration, lower cumulative SRI	Increasing high-SRI days, longer restoration times, larger correlated outages
Generator Forced Outage and Performance Trends	Annual/monthly WEFOR, fuel-specific outage rates, unavailable MWh, seasonal outage spikes	Overall WEFOR increased to 9.2%; coal 11.2% to 14.1% (39.8 TWh change), combined cycle 4.2% to 5.7% (19.1 TWh change)	Improved winter performance, reduced outage severity during extreme events	Elevated WEFOR, correlated winter outage spikes
Reliable Large Load Integration	Peak demand growth, frequency response, load forecast error, transmission constraints, CILR	Annual energy demand increased to ~4.95 million GWh; actual summer peak higher than forecast; two CILRs exceeding 1,000 MWs	Stable frequency performance, improved operational visibility	Rapid localized demand growth, frequency volatility, planning uncertainty
Reliable BESS Integration and Performance	Frequency arrest performance, recovery speed, BESS availability	BESS deployment approximately matched solar growth; improved fast frequency response performance observed when incentivized in high-BESS areas	Improved frequency recovery, successful grid-forming performance	Thermal runaway/fire events, duration limitations, unavailable BESS capacity
Reliable IBR Integration	Ride-through performance, rate-of-change-of-frequency (RoCoF), IBR trip events, model validation	Expanded IBR mitigation activities continued through 2025	Reduced disturbance-related tripping, improved model accuracy	Weak-grid instability, repeated tripping events, model-performance divergence

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 210
NIPSCO Q2 2026 Cost Recovery Filing

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September 21, 2026

Via E-Filing

The Honorable Debbie-Anne Reese
Secretary Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Northern Indiana Public Service Company LLC Section 202(c) Cost Recovery Filing
Docket No. ER26-___-000

Dear Secretary Reese:

On December 23, 2025, the Secretary of the U.S. Department of Energy ("DOE") issued the first emergency order pursuant to section 202(c) of the Federal Power Act ("FPA")[1] directing the Midcontinent Independent System Operator, Inc. ("MISO") and Northern Indiana Public Service Company LLC ("NIPSCO") to "take all measures necessary to ensure" that NIPSCO's R.M. Schahfer Generating Station Units 17 and 18 ("Impacted Schahfer Units") are available to operate.[2] Since that time, DOE has issued three additional emergency orders directed at MISO and NIPSCO pertaining to the Impacted Schahfer Units.[3] In this filing, submitted pursuant to FPA sections 202(c), 205 and 309[4] and Part 35 of the Federal Energy Regulatory Commission's

[1] 16 U.S.C. § 824a(c).

[2] U.S. Department of Energy, Order No. 202-25-12 (issued Dec. 23, 2025) ("December 2025 DOE Order").

[3] U.S. Department of Energy, Order No. 202-26-19 (issued March 23, 2026) ("March 2026 DOE Order"); U.S. Department of Energy, Order No. 202-26-29 (issued June 18, 2026) ("June 2026 DOE Order"); and, U.S. Department of Energy, Order No. 202-26-46 (issued September 18, 2026) ("September 2026 DOE Order") (together with the December 2025 DOE Order, the March 2026 DOE Order, the June 2026 DOE Order and the September 2026 DOE Order are collectively referred to as the "DOE Orders").

[4] 16 U.S.C. §§ 824a(c), 824d and 825h (2024).

("FERC" or the "Commission") Rules and Regulations,[5] NIPSCO hereby seeks recovery of the costs incurred to comply with the DOE Orders for the period April 1 through June 30, 2026 ("Quarter 2 Order Costs").[6] This filing is made in compliance with the DOE Orders; the Commission's March 19, 2026 Order accepting NIPSCO's Complaint filed against MISO in FERC Docket No. EL26-36-000 and the August 3, 2026 Order on Rehearing in FERC Docket No. EL26-36-001;[7] and, MISO's Open Access Transmission, Energy, and Operating Reserve Markets Tariff ("Tariff") Schedule 56.[8] This filing is also made consistent with and is supplemental to NIPSCO's filing submitted on August 4, 2026 in FERC Docket No. ER26-3423-000 seeking recovery of Quarter 1 Order Costs and providing justification for the costs incurred to comply with the DOE Orders.

In granting NIPSCO's Complaint, the Commission took the first step required for cost recovery. The Commission approved NIPSCO's request to require MISO to develop a cost

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5 18 C.F.R. Part 35 (2025).

6 On August 4, 2026, NIPSCO submitted a filing in FERC Docket No. ER26-3423-000 with the cost support to recover costs to comply with the DOE Orders for the period January 1 through March 31, 2026 ("Quarter 1 Order Costs") (the "Quarter 1 Order Costs Filing"). As explained in the Quarter 1 Order Costs Filing and below and in the Direct Testimony of Kevin J. Blissmer, Exhibit No. NIP-100 ("Blissmer Testimony"), NIPSCO seeks recovery of the Quarter 2 Order Costs to align the instant filing for cost recovery with established monthly and quarterly accounting and financial reporting processes. The term "Quarter 2 Order Costs" is used by NIPSCO in this filing to refer to the costs defined in Rate Schedule 56 as "Order Costs" and should be found to be recoverable by FERC as "Recoverable Order Costs." NIPSCO will submit subsequent filings for recovery of costs incurred to comply with all DOE orders for each yearly quarter the DOE orders remain in effect.

7 *N. Ind. Pub. Serv. Co. LLC v. Midcontinent Indep. Sys. Operator Inc.*, 194 FERC ¶ 61,215 (2026) ("Order on Complaint") *reh'g denied*, 195 FERC ¶ 62,109 (2026) *order on reh'g*, 196 FERC ¶ 61,095 (2026) ("Order on Rehearing").

8 To the extent necessary, NIPSCO submits this application pursuant to Section 205 of the FPA (16 U.S.C. § 824d (2024) and Part 35 of the Commission's Rules and Regulations to allow NIPSCO to recover these costs following a 60-day notice period in accordance with the rate schedule (Schedule 56 under the MISO Tariff) that the Commission approved as part of the complaint proceeding in FERC Docket No. EL26-36-000. In its Order on Complaint, the Commission directed MISO to submit Schedule 56 as a compliance filing within thirty (30) days of the Commission's approval of MISO's filing in FERC Docket No. ER25-3425-000 – the docket in which MISO introduced Schedule 55 to recover similar DOE emergency order costs incurred by Consumers Energy to continue operation of the J.H. Campbell Power Plant. As of the date of the instant filing, the Commission has not issued an order in the FERC Docket No. ER25-3425-000 proceeding, so MISO has not made its compliance filing pursuant to Section 205 of the FPA and 18 C.F.R. §35.12 to include Schedule 56 as a new rate schedule in the MISO Tariff. NIPSCO understands that the costs supported here cannot be recovered until such time as the Commission issues an order in the anticipated MISO compliance filing on Schedule 56. Because Schedule 56 is the operative rate schedule to permit NIPSCO to recover its costs associated with the DOE Orders, NIPSCO submits this filing now to satisfy the 60-day notice period and intends to request MISO to include for recovery the DOE Order Costs through Schedule 56 on the first day of the month following the Commission's order on MISO's compliance filing on Schedule 56.

allocation methodology, to be contained in Schedule 56, pursuant to which NIPSCO can submit for cost recovery the costs it incurs to comply with the DOE Orders. As acknowledged by NIPSCO and the Commission, "NIPSCO must petition the Commission in a separate proceeding at a later date for approval to recover specific DOE Order Costs before ratepayers can be charged for such costs."[9] NIPSCO did just that in its Quarter 1 Order Costs Filing. The purpose of this filing is to present the actual costs incurred in the second quarter of 2026 to comply with the DOE Orders (net of MISO market revenue during the period) for approval.

As further explained herein, NIPSCO is submitting this filing pursuant to FPA section 205, in addition to sections 202(c) and 309. While section 202(c) and the DOE Orders provide an independent basis for NIPSCO's cost recovery for the Quarter 2 Order Costs, NIPSCO is also making this filing pursuant to FPA section 205, with all of the attendant procedures and rights available to a filing party in a section 205 proceeding,[10] as the costs supported below were incurred in connection with a FERC-jurisdictional service provided by NIPSCO. NIPSCO therefore requests that the Commission act on this filing and accept the Quarter 2 Order Costs by November 20, 2026, or within sixty (60) days of this filing and made effective as of December 23, 2025.[11] Following the 60-day statutory notice period after the date of this filing, NIPSCO intends to request that MISO implement recovery of the Quarter 2 Order Costs through Schedule 56, subject to potential refunds with interest.

NIPSCO acknowledges that MISO's Schedule 56 compliance filing must be accepted for filing by the Commission before NIPSCO can begin to recover its costs through the MISO Tariff. In the event MISO's compliance filing has not been accepted within sixty (60) days of the date of this filing, NIPSCO will wait until the Commission approves Schedule 56 to implement recovery of the Quarter 2 Order Costs. On that date (the date of Commission action on the MISO Schedule 56 compliance filing), NIPSCO will ask MISO to implement the rates subject to refund, consistent with other section 205 rate filings.[12] Therefore, NIPSCO requests that the Commission

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9 Order on Complaint at P 40.

10 16 U.S.C. § 824d(d); 18 C.F.R. Part 35 *et seq.*

11 The requested effective date coincides with FERC's establishment of a December 23, 2025 effective date for Schedule 56 in FERC Docket No. EL26-36-000.

12 *See e.g., System Energy Resources, Inc.*, 178 FERC ¶ 61,184 (2022) (accepting revised rates filed under section 205 subject to refund and outcome of hearing and settlement judge procedures); *Entergy Arkansas, Inc., et al.*, 163 FERC ¶ 61,166 (2018) (accepting filing made pursuant to section 205 within 60 days, subject to refund). NIPSCO is aware that, consistent with 18 C.F.R. § 35.4, permission to make rates "effective" does not constitute affirmative Commission approval and is therefore aware that its rates would be subject to refund depending on the outcome of the Commission order and, if directed, hearing and settlement procedures. NIPSCO is also aware that, consistent with prior notice requirements, in the event the Commission order accepting the MISO Schedule 56 compliance filing occurs prior to the 60-day notice period required for this filing, NIPSCO will wait to provide MISO such notice until November 20, 2026.

expeditiously approve MISO's compliance filing on Schedule 56, so that NIPSCO can move forward with recovery, subject to refund, of its costs to comply with the DOE Orders.

Commission action within sixty (60) days is particularly warranted here to ensure regulatory certainty and administrative efficiency in light of the fact that NIPSCO received a second DOE 202(c) Order on March 23, 2026, a third DOE 202(c) Order on June 18, 2026, and a fourth DOE 202(c) Order on September 18, 2026. NIPSCO will need to make similar but separate filings for the majority of costs incurred to comply with the June 2026 and September 2026 DOE Orders,[13] as well as any subsequent orders, and a Commission order accepting the Quarter 2 Order Costs presented in this filing will enhance regulatory certainty and better allow NIPSCO to fulfill its statutory and order-mandated obligations.

Further, expedited Commission action is warranted due to the nature of DOE's action and its determination in the December 2025 DOE Order, the March 2026 DOE Order, the June 2026 DOE Order, and the September 2026 Order that continued operation of the Impacted Schahfer Units is necessary and will serve the public interest. NIPSCO's costs incurred to comply with such orders should be approved in a timely fashion.[14]

I. Description of NIPSCO

NIPSCO is an Indiana limited liability company headquartered in Merrillville, Indiana and is a subsidiary of NiSource Inc. NIPSCO serves more than 877,800 natural gas customers and 492,700 electric customers, or 1.3 million total customers across Northern Indiana. NIPSCO owns and operates approximately 3,880 megawatts of electric generating capacity and 2,981 miles of electric transmission lines. NIPSCO is an electric load-serving entity and a transmission-owning member of MISO. NIPSCO has transferred functional control of its transmission system to MISO, which serves as NIPSCO's Reliability Coordinator.

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[13] As noted, *infra*, NIPSCO includes eight (8) days of costs incurred to comply with the June 2026 DOE Order to complete the recovery period for the Second Quarter of 2026.

[14] On September 11, 2026, the United States Court of Appeals for the District of Columbia Circuit ("D.C. Circuit") issued an opinion in *People of the State of Michigan v. U.S. Dept. of Energy and Christopher A. Wright, Sec.* ("Consumers Energy Opinion") vacating an FPA section 202(c) Order issued to Consumers Energy on May 23, 2025. The DOE 202(c) Order at issue in that case is similar to the four DOE 202(c) Orders issued to NIPSCO and MISO. Two of the NIPSCO-directed DOE 202(c) Orders (the December 2025 Order and the March 2026 Order) are currently on appeal to the D.C. Circuit and those appeals are consolidated and stayed pending the outcome in the Consumers Energy action. As of this filing, the appeals of the NIPSCO-directed DOE Orders remain stayed pending further procedures before the Court and are not impacted by the Consumers Energy Opinion.

II. Background

A. December 2025 DOE Order

On December 23, 2025, the Secretary of Energy issued an Order under FPA Section 202(c) directing NIPSCO and MISO to ensure the continued availability and operation of the Impacted Schahfer Units, which had been scheduled to retire on December 31, 2025. The December 2025 DOE Order directs MISO and NIPSCO to "take all measures necessary to ensure" that the Impacted Schahfer Units continue to operate. The term of the December 2025 DOE Order was from December 23, 2025 to March 23, 2026 ("December 2025 DOE Order Duration Period").

B. March 2026 DOE Order

On March 23, 2026, the Secretary of Energy issued a second Order under FPA Section 202(c) directing NIPSCO and MISO to continue to ensure the continued availability and operation of the Impacted Schahfer Units. Similar to the December 2025 DOE Order, the March 2026 DOE Order directs MISO and NIPSCO to "take all measures necessary to ensure" that the Impacted Schahfer Units continue to operate. The term of the March 2026 DOE Order is from March 24, 2026 to June 21, 2026 ("March 2026 DOE Order Duration Period").

C. June 2026 DOE Order

On June 18, 2026, the Secretary of Energy issued a third Order under FPA Section 202(c) directing NIPSCO and MISO to continue to ensure the continued availability and operation of the Impacted Schahfer Units. Similar to the December 2025 DOE Order and March 2026 DOE Order, the June 2026 DOE Order directs MISO and NIPSCO to "take all measures necessary to ensure" that the Impacted Schahfer Units continue to operate. The term of the June 2026 DOE Order is from June 22, 2026 to September 19, 2026.

D. September 2026 DOE Order

On September 18, 2026, the Secretary of Energy issued a fourth Order under FPA Section 202(c) directing NIPSCO and MISO to continue to ensure the continued availability and operation of the Impacted Schahfer Units. Similar to the other orders, the September 2026 DOE Order directs MISO and NIPSCO to "take all measures necessary to ensure" that the Impacted Schahfer Units continue to operate. The term of the September 2026 DOE Order is from September 20, 2026 to December 18, 2026.

E. NIPSCO's Communications with MISO Independent Market Monitor

Prior to offering Schahfer Unit 17 into the Day Ahead and Real Time Markets pursuant to the December 2025 DOE Order, NIPSCO spoke with the MISO Independent Market Monitor ("IMM") to explain NIPSCO's intended compliance strategy for the submission of bids into the MISO energy markets. NIPSCO also informed the IMM of the current rating status of Unit 17 and advised that Unit 18 is currently in a Forced Outage and not immediately available for market

participation. NIPSCO understands that the IMM used this information to set an appropriate Reference Price for the Impacted Schahfer Units.

F. NIPSCO's Complaint Case Against MISO

On December 29, 2025, NIPSCO filed a Complaint pursuant to FPA sections 202(c), 306 and 309 and the December 2025 DOE Order's directive to "file with the [Commission] Tariff revisions or waivers necessary to effectuate [the] order."[15] The Complaint requested that the Commission order MISO to amend the MISO Tariff to include a mechanism for recovery of the costs incurred to comply with the DOE Orders, net of MISO market revenues and to allocate such costs to load serving entities ("LSEs") throughout MISO Local Resource Zones 1 through 7 on a load ratio share basis. With its complaint, NIPSCO included a proposed tariff provision (Schedule 56) that could be included in the MISO Tariff for purposes of NIPSCO's DOE Order cost recovery. NIPSCO also noted that the issue of cost allocation on a demand or energy basis was then pending before the Commission in FERC Docket No. ER25-3425-000 and that NIPSCO would defer to the Commission's final decision in that proceeding.

On March 19, 2026, the Commission issued an order granting the complaint and finding that the proposed Schedule 56 is just and reasonable, subject to modification and to the outcome of the proceeding in FERC Docket No. ER25-3425-000.[16] The Commission also directed MISO to make a compliance filing within thirty (30) days of the date of a Commission order accepting MISO's compliance filing in FERC Docket No. ER25-3425-000.

G. NIPSCO's Quarter 1 Order Costs Filing and Update

On August 4, 2026, NIPSCO submitted the Quarter 1 Order Costs Filing. In that application, NIPSCO sought approval to recover $38,046,241 in net Quarter 1 Order Costs. During a portion of Quarter 1, Unit 17 was operational and earned $33,501,717 in the MISO markets, which was netted against the total expense of $68,575,699.

As part of the Quarter 1 Order Costs, NIPSCO included Carrying Costs of $136,635. The Carrying Costs include an adjustment for recovery that is captured under the Indiana Utility Regulatory Commission ("IURC") base rates. In preparing this application, NIPSCO determined that it had not sufficiently recognized the adjustment for IURC base rate revenue from the IURC. This application includes the improved calculation for the carrying cost expense item. In a separate filing, NIPSCO is making a $108,628 reduction to its Quarter 1 Order Costs Filing.[17]

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[15] December 2025 DOE Order at Ordering Paragraph E.

[16] Order on Complaint at P 2.

[17] NIPSCO is making these filings simultaneously to assist MISO Settlements by having one settlement period that will capture both NIPSCO's Quarter 1 and Quarter 2 recovery.

H. NIPSCO's Offerings into the MISO Day Ahead and Real Time Markets

As described in the Direct Testimony of Karl E. Stanley, Exhibit No. NIP-200 ("Stanley Testimony"), NIPSCO's Day Ahead Asset Optimization team is responsible for formulating the daily offers used within MISO's Day Ahead Market.[18] Due to both units being in outages during the entirety of Quarter 2 2026, Mr. Stanley explains that unlike Quarter 1 2026, there are no market revenues to net against the costs incurred in Quarter 2 2026.[19] However, during Quarter 2 2026, Mr. Stanley explains that MISO adjusted the net settlement amounts for the previous period and, as part of those adjustments, NIPSCO received an additional $20,280 in MISO Market revenue.[20] While this revenue technically corresponds with NIPSCO's market activity in Quarter 1 2026, NIPSCO did not receive the revenue until Quarter 2 2026 and includes that amount in this filing which is netted against NIPSCO's Quarter 2 Order Costs.

I. Consumers Energy Opinion

In the Consumers Energy Opinion, the D.C. Circuit held that DOE exceeded its statutory authority in issuing an order under section 202(c) of the FPA directing Consumers Energy Company's J.H. Campbell generating plant remain in operation beyond its scheduled retirement. The D.C. Circuit accordingly vacated DOE's May 23, 2025 Order (Order No. 202-25-3).

The Court rested its decision largely on statutory interpretation of section 202 of the FPA and found that, in light of the text and structure of the FPA and the primacy it gives to state authority over electricity generation, 202(c) is intended to be a narrow, last-resort backstop that is triggered only by a grid-reliability risk requiring immediate action *specifically* by DOE (rather than other state or regional entities better suited to the task). The Court disagreed with DOE's interpretation of an "emergency" within the meaning of 202(c) and found that "emergency" means a "grid-reliability risk that calls for immediate response by DOE in particular."[21] The circumstances DOE identified and the evidence that it provided in Order No. 202-25-3 were insufficient to justify an emergency necessitating DOE action under 202(c): the record showed that MISO had procured sufficient capacity for summer 2025, that Michigan and MISO had planned around Campbell's retirement, and that ordinary resource-adequacy mechanisms were available to address any shortfall. The Court specified that "had DOE pinpointed a concrete supply issue beyond the state's competency that was likely to trigger a blackout in an identified area if temperatures peaked, immediate action might have been appropriate. But the mere possibility of

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[18] Stanley Testimony, Exhibit No. NIP-200, at 2.

[19] Stanley Testimony at 4. When in operation, the market strategy for the Impacted Schahfer Units was described in the Stanley Testimony with NIPSCO's Quarter 1 Order Costs Filing (Exh. No. NIP-200).

[20] *Id.* at 4-5.

[21] Consumers Energy Opinion at 27.

an electricity supply shortfall – with no specifics about its potential severity, timing, location or likelihood – does not warrant an emergency federal response."[22]

Having found the statutory argument dispositive, the court declined to reach the petitioners' remaining challenges and vacated the order, noting that its deficiency could not be cured on remand and that vacatur would not be disruptive because the order had already expired. The decision does not resolve whether Consumers Energy may recover the prudently incurred costs to comply with the order. The Consumers Energy case was not consolidated with appeals of any other 202(c) Orders (including those directed to NIPSCO). While many of those cases are held in abeyance pending the Court's final disposition of the Consumers Energy appeal, as of the date of this filing, there is no immediate impact on the appeals of the other 202(c) Orders.

III. Current Status of Units 17 and 18 and Initial Plan to Comply With DOE Orders

As described in the Direct Testimony of Rockey Pollard, Exhibit No. NIP-300 ("Pollard Testimony"), Unit 17 is currently in a Planned Outage, while Unit 18 is in a Forced Outage.[23]

As explained by Mr. Pollard, NIPSCO engaged the engineering firm Sargent & Lundy to assess the status of the Impacted Schahfer Units and the work necessary to return the Impacted Schahfer Units to service in compliance with the DOE Orders.[24] Out of an abundance of caution, Sargent & Lundy also assessed the work necessary to operate the Impacted Schahfer Units through the end of 2028 in anticipation of potential future DOE Orders.[25] The full scope of Sargent & Lundy's recommendations reflected a full refurbishment strategy appropriate for long-term operation of the units, including extensive upgrades, modernization activities and replacement of equipment.[26] These recommendations, while beneficial for longer-term operations and reliability, were not strictly necessary to meet DOE's directive to "take all measures necessary to ensure" the units remain available to operate.[27] Thus, NIPSCO did not adopt the full scope of Sargent & Lundy's recommendations. Instead, NIPSCO has undertaken a deliberate and disciplined review of each recommended item based on (1) operational necessity, (2) environmental compliance, (3) safety, (4) outage feasibility, and (5) cost prudence to determine whether it was essential to

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22 Consumers Energy Opinion at 37.

23 Pollard Testimony, Exhibit No. NIP-300, at 4-5, 8-9.

24 *Id.* at 3-4. NIPSCO selected Sargent & Lundy to do this work based on Sargent & Lundy's vast knowledge, experience and expertise with projects of this type, and for its institutional knowledge of the Impacted Schahfer Units. *See* Direct Testimony of Rockey Pollard, Docket No. ER26-3423-000, Exhibit No. NIP-300 at 6.

25 *Id.* at 4.

26 *Id.*

27 *Id.*

restoring safe and reliable operation through the limited period covered by the existing, and anticipated potential DOE Orders, through late 2028 or early 2029.[28]

NIPSCO's narrowed scope focused exclusively on the condition of the key generation station components that directly affected the Impacted Schahfer Units' ability to operate safely and reliably. This included turbine and generator repairs, boiler tube replacements and feedwater system restoration, coal handling and mill repairs, cooling tower structural and mechanical work, and essential repairs to the flue gas desulfurization systems.[29]

A. Status of Unit 17

Unit 17 was offline for the entirety of Quarter 2 2026 due to a planned maintenance outage to address issues uncovered during an inspection and to ensure reliable future operation.[30] The scope of the inspection was based on findings from an earlier inspection of Schahfer Unit 18 and yielded a similar finding that steam turbine repairs would be necessary to bring the unit back online. NIPSCO currently anticipates that Unit 17's planned maintenance outage will conclude in October 2026.[31]

During this planned maintenance outage, NIPSCO performed inspections and work on several systems, including coal handling equipment, boiler, flue gas desulfurization system, mechanical equipment (pumps, valves, fire protection, structures, coal pulverizer), electrical systems (motors, RAT busses, breakers), and the turbine/generator.[32] Specifically, based on Sargent & Lundy's inspection and recommendations, and taking NIPSCO's own criteria for determining the prudency of the work to be done into consideration, NIPSCO performed the following work during Quarter 2, also fully described in the Pollard Testimony:[33]

- **Flue Gas Desulfurization ("FGD") System:** NIPSCO substantially completed the absorber cleaning to the FGD and completed inspections of the ductwork and structure gallery. NIPSCO also initiated structural repairs to the gallery and common inlet duct work that included both patching of the duct walls and full section replacements due to thinning of material. NIPSCO also initiated replacement of the Dibasic Acid ("DBA") feed lines, new injection nozzles in the absorbers, new instrument air and water service lines, new air dryers, new control valves (both air and water), and rebuilt two turblex blowers. NIPSCO began needed repairs to the precipitator, which included replacing expansion joints, patching thin wall material, and precipitator wires.

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28 *Id.*

29 *See, generally, Id.* at 4-11.

30 *Id*. at 4-5.

31 *Id.* at 5.

32 *Id.* at 6-7.

33 *Id.* at 10.

- **Boiler:** NIPSCO completed the installation of scaffolding at the boiler, completed the boiler tube inspections, and nearly completed the boiler cleaning and boiler tube thickness testing and mapping. NIPSCO performed initial repairs to the boiler tube and pendant sections, which included replacing tube sections (dutchman) due to wall thickness. NIPSCO rebuilt two of three boiler water circulating pumps due to degraded performance and started burner structural repairs. NIPSCO also assessed the High Energy Piping and piping hangers. The steam safety valves were sent out for inspection and necessary rebuilds were initiated.

- **Condenser/Cooling Water System:** NIPSCO completed the condenser cleaning and started to perform condenser repair work, which included plugging leaking tubes. NIPSCO performed an analysis of the cooling tower structure and planned repairs. The cooling towers had full fan blade, motor, gearboxes, and fill inspected. Based on these findings, NIPSCO began the cooling tower fill and blade replacements. Hot and cold side circulating water inspections were completed and repairs began due to thinning material found.

- **Turbine/Generator System:** NIPSCO had both HP/IP and LP rotors removed and sent to professional turbine shops for inspection. The HP/IP rotor was found to have significant cracking and multiple rows of blades were found to need replacement. These repairs were planned to begin in Quarter 2 for completion in Quarter 3. The turbine control valves and exciters were removed and sent out for inspections and repairs as needed. NIPSCO also performed GAP2 testing on the generator.

- **Coal Handling System:** NIPSCO completed evaluations of the coal handling system, placed orders for coal belts and wash equipment and completed the initial coal feeder repair planning. Pulverizers were inspected and repairs were planned. The dust collection system was found to be performing poorly, and a replacement system design was initiated.

- **Balance of Plant:** NIPSCO completed necessary equipment removal in many areas of the site, performed motor inspections and overhauls, performed pump inspections and repairs, initiated valve repair/replacement activities, and completed the feedwater system investigation and performed corrective repairs to address derate issues. NIPSCO evaluated the controls systems used in each area of the unit, and started planning updates to boiler, turbine, coal handling, and FGD controls. NIPSCO evaluated the integrity of the building itself, and initiated needed roof, HVAC, and door repairs.

B. Status of Unit 18

Since July 9, 2025, Unit 18 has been in a forced outage due to failure of the unit's low-pressure rotator blade.[34] NIPSCO is working towards returning Unit 18 to service, targeting mid-December 2026.[35] The anticipated repairs will focus on restoring full turbine functionality

[34] *Id.* at 8.

[35] *Id*. at 8-9.

and ensuring the unit can be safely and reliably recommissioned.[36] As with Unit 17, Sargent & Lundy analyzed the condition of Unit 18 and made recommendations regarding compliance with the DOE Orders.[37]

Based on analysis using the criteria discussed above, NIPSCO determined that the repairs necessary to restore Unit 18 to safe and reliable operation will likely include work on the turbine and generator, the FGD system, the boiler, the coal handling system, the mill, and the cooling tower. For Quarter 2 2026, NIPSCO performed the following work on Unit 18, as described in more detail in the Pollard Testimony:[38]

- **FGD:** NIPSCO substantially completed the absorber cleaning to the FGD and completed inspections of the ductwork and structure gallery of the system. NIPSCO initiated structural repairs to the gallery and common inlet duct work that included both patching and full section replacement due to thinning of material. NIPSCO also initiated replacement the DBA feed lines, new injection nozzles in the absorbers, new instrument air and water service lines, new air dryers, new control valves (both air and water), rebuilt two turblex blowers. NIPSCO also completed the precipitator cleaning and inspection and began needed repairs to the precipitator, which included replacing expansion joints, patching thin wall material, and precipitator wires.

- **Boiler:** NIPSCO completed the installation of scaffolding at the boiler, completed the boiler tube inspections, and nearly completed the boiler cleaning and boiler tube thickness testing and mapping. NIPSCO performed initial repairs to the boiler tube and pendant sections, which included replacing tube sections (dutchman) due to wall thickness. NIPSCO rebuilt two of three boiler water circulating pumps due to degraded performance and started burner structural repairs (due to operating hours since last repair). NIPSCO also assessed the High Energy Piping and piping hangers. The steam safety valves were sent out for inspection and necessary rebuilds were initiated.

- **Condenser/Cooling Water System:** NIPSCO completed the condenser cleaning and performed condenser repair work, which included plugging leaking tubes. NIPSCO performed an analysis of the cooling tower structure and planned repairs. The cooling tower had fan blade, motor, gearboxes, and fill inspected. Based on these findings, NIPSCO began the cooling tower fill and blade replacements. Hot and Cold side circulating water inspections were completed and repairs began due to thinning material found.

- **Turbine/Generator System:** NIPSCO had both HP/IP and LP rotors removed and sent to professional turbine shops for inspections. The LP rotor was found to have significant cracking and multiple rows of blades were found to need replacement. These repairs were

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36 *Id*.

37 *Id.* at 9.

38 *Id.* at 9-11.

planned to begin in Quarter 2 for completion in Quarter 4. The turbine control valves and exciters were removed and sent out for inspections and repairs as needed. NIPSCO also performed GAP2 testing on the generator.

- **Coal Handling Systems:** NIPSCO completed the evaluations of the coal handling system, placed orders for coal belts and wash equipment and completed the initial coal feeder repair planning. Pulverizers were inspected and repairs were planned. The dust collection system was found to be performing poorly, and a replacement system design was initiated.

- Balance of Plant: NIPSCO completed necessary equipment removal in many areas of the site, performed motor inspections, and overhauls, performed pump inspections and repairs, initiated valve repair/replacement activities, and completed the feedwater system investigation and performed corrective repairs to address derate issues. NIPSCO evaluated the controls systems used in each area of the unit, and started planning updates to boiler, turbine, coal handling, and FGD controls. NIPSCO evaluated the integrity of the building itself, and initiated needed roof, HVAC, and door repairs.

C. NIPSCO's Plans to Comply with the DOE Orders is Reasonable

As demonstrated in the Pollard Testimony, NIPSCO is conducting a reasoned approach to identifying the repairs needed and best path forward to comply with the DOE Orders without knowing how long the DOE will continue to issue the emergency orders. NIPSCO's actions are prudent and will not result in unjust or unreasonable rate recovery.

The Direct Testimony of Dr. Metin Celebi and Dr. Samuel A. Newell ("Celebi/Newell Testimony") of The Brattle Group further explains that NIPSCO's principles guiding its actions to comply with the DOE Orders and its proposed cost recovery in rates is reasonable in their expert opinion.[39] According to Drs. Celebi and Newell, NIPSCO's "compliance approach which we found reasonable in Q1 continued to provide appropriate protection against over-spending during Q2 while allowing NIPSCO to comply with the DOE Orders."[40] Drs. Celebi and Newell recognize that the duration of the 202(c) orders is unknowable and confirm that the "successive DOE 202(c) Orders to date . . . reinforce why NIPSCO's compliance approach remains appropriate."[41] Drs. Celebi and Newell conclude that a "framework that commits NIPSCO to prudent contemporaneous decision-making, full recovery of the resulting costs from beneficiaries, and nothing more, is the right one for compliance" given the uncertainty of knowing how long the emergency orders will be in effect.[42] NIPSCO's efforts to comply with the DOE Orders meets this standard.

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[39] Celebi/Newell Testimony at 16-17.

[40] *Id.* at 19.

[41] *Id.* at 17.

[42] *Id.* ("During Q2 2026, NIPSCO had to determine how best to comply with the then-effective directive and commit repair dollars before knowing whether DOE would issue further extensions or how long the orders would ultimately remain in effect. The total duration of sequential DOE 202(c) Orders was

IV. Description of the Quarter 2 Order Costs

In this filing, NIPSCO describes the actual Quarter 2 Order Costs that are being presented for Commission approval as just and reasonable pursuant to FPA section 202(c) and 205. As described in proposed Schedule 56 of the MISO Tariff, such costs are deemed "Recoverable Order Costs" to be allocated pursuant to that schedule.

A. Overview of the Quarter 2 Order Costs

In this filing, NIPSCO is seeking Commission approval of $62,627,790 in Quarter 2 Order Costs. This figure reflects the actual costs incurred by NIPSCO after netting against the total MISO revenue realized by NIPSCO from operation of the Impacted Schahfer Units in compliance with the DOE Orders.

In support of the approval of the Quarter 2 Order Costs, NIPSCO is submitting the Direct Testimonies of Kevin Blissmer, Karl Stanley, and Rockey Pollard. The Pollard Testimony identifies the actual costs incurred during this period and the work that was performed to incur those costs. The Stanley Testimony describes NIPSCO's post-DOE 202(c) Order actions in the MISO Day-Ahead and Realtime Markets and the amounts recovered through the supply of energy to the market and netted against the NIPSCO costs incurred. Finally, the Blissmer Testimony specifically describes and supports the accounting treatment for the categories of costs that constitute the Quarter 2 Order Costs, including: (1) Return on Capital Investments; (2) Depreciation and Amortization Expense; (3) Fuel Costs; (4) O&M Expenses; (5) Administrative & General ("A&G") Expense; and (6) Other Taxes.

The costs that NIPSCO proposes to recover herein are those that were incurred from April 1, 2026 through June 30, 2026.[43] While the March 2026 Order Duration Period is technically March 24, 2026 to June 21, 2026, similar to the Quarter 1 Order Costs, NIPSCO proposes to align the recovery period with monthly and quarterly accounting and financial reporting processes.[44] Due to the fact that DOE issued the subsequent June 2026 DOE Order, therefore requiring NIPSCO to incur costs to continue operation of the Impacted Schahfer Units, NIPSCO's proposal to align the costs with the financial quarter simplifies this filing and alleviates the need to allocate costs on an intra-month basis.[45]

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unpredictable as it would depend on the DOE Secretary's discretion. Therefore, evaluating NIPSCO's decisions against information that emerged only later would not be consistent with the Commission's precedent." *Id.* at 13-14).

[43] Blissmer Testimony at 2.

[44] *Id.* at 4-5.

[45] *Id.*

The precise breakdown of Quarter 2 Order Costs (including the MISO net settlements) includes:

Table 1: Quarter 2 Order Costs

Line	Category	Amount
1	Capital Investment (Rate Base)	$115,379,096
2	Quarterly Rate of Return	2.42%
3	Return on Capital Investment	$2,792,174
4	Depreciation and Amortization Expense	$3,488,690
5	Fuel Costs	$34,168
6	Operations & Maintenance Expenses	$54,303,706
7	Administrative & General Expense	$268,713
8	Other Taxes	$998,260
9	Total Expenses	$59,093,537
10	Less: Credit for MISO Net Settlements	$20,280
11	Carrying Cost	$762,359
12	**Quarter 2 2026 Order Costs**	**$62,627,790**

B. Accounting for Quarter 2 Order Costs

As noted in the Blissmer Testimony, NIPSCO created a regulatory asset to book all costs incurred to comply with the DOE Orders.[46] It is appropriate for NIPSCO to defer these costs as a regulatory asset because the actual timing of the recovery of these costs is largely unknown.[47]

In this filing, NIPSCO proposes to treat all Quarter 2 Order Costs to comply with the DOE 202(c) Orders as an expense for full recovery rather than capitalizing the costs.[48] According to Mr. Blissmer, NIPSCO treated these costs as necessary one-time costs to continue operation of the Impacted Schahfer Units for the DOE 202(c) Order duration period because of the uncertainty of how many emergency orders will be issued by DOE and how long NIPSCO will be required to operate the Impacted Schahfer Units.[49] Treating all of the costs as an expense also mitigates any potential risk for stranded cost recovery in the event the DOE orders are not extended or renewed

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[46] Blissmer Testimony at 3.

[47] NIPSCO notes that at the time of this filing, the MISO and Consumers Energy Company filings for recovery of costs associated with the DOE orders for Consumers' Campbell units have been pending at FERC for over seven months. It is not clear when those orders will issue, and, in turn, when any order on MISO's compliance filing with Schedule 56 will issue.

[48] Blissmer Testimony at 5-6. As noted, *supra*, NIPSCO intends to make subsequent filings with the Commission to recover costs to comply with the DOE Orders and reserves the right to propose other recovery treatments in those filings.

[49] *Id.*

beyond any proposed full capital recovery period. Drs. Celebi and Newell confirm that it is appropriate to expense the cost items because the usage period is uncertain and cannot be controlled or foreseen by NIPSCO beyond the current 90-day period.[50] Capitalizing the costs with a recovery period beyond the current period "could leave amounts unrecovered if the Orders lapse before the recovery period ends, which could expose NIPSCO and Indiana ratepayers to new stranded costs."[51] As Drs. Celebi and Newell conclude, NIPSCO's proposed accounting treatment is reasonable because it "aligns cost responsibility with the period of use, the beneficiaries of the continued operation, and the revenues created during that period."[52]

In addition, NIPSCO deferred as a regulatory liability all MISO Net Settlement Revenues associated with operating the Impacted Schahfer Units during Quarter 2 2026.[53] As described herein, NIPSCO is also requesting to recover a carrying charge on the amounts booked to the regulatory asset in the amount of $762,359, as there has already been, and NIPSCO anticipates that there may be further, delay in actual recovery of these costs.

C. Specific Cost Categories

1. Return on Capital Investment

The Quarter 2 Order Costs being presented include a reasonable return on the capital investment for the Impacted Schahfer Units in the amount of $2,792,174.[54] This figure was derived by multiplying the Capital Investment (Rate Base) of $115,379,096[55] by the Quarterly Rate of Return of 2.42%.[56]

The Quarterly Rate of Return was calculated by first determining the average long-term debt and common stock balances for the recovery period.[57] The average cost of long-term debt was derived by dividing NIPSCO's long-term interest expense for the quarter by the average long-term debt balance, which was equal to 5.11%.[58] NIPSCO proposes to use the ROE of 9.75%

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50 Celebi/Newell Testimony at 24.

51 *Id*.

52 *Id.* at 27.

53 Blissmer Testimony at 4.

54 *Id.* at 8.

55 In addition to weighted average net plant balances for the Impacted Schahfer Units, the rate base figure used to derive the Return component also includes working capital comprised of coal inventory and material and supplies that are necessary to support the continued operation of the Impacted Schahfer Units. Additionally, the rate base figure has been adjusted for accumulated deferred income taxes ("ADIT") associated with the Impacted Schahfer Units. *See Id.*

56 *Id.* at 8-9.

57 *Id.* at 8.

58 *Id*.

approved by the IURC in its calculation of an annual after-tax weighted average rate of return of 7.82% applied in this proceeding.[59] NIPSCO is proposing to use this lower average rate of return, despite the fact that its IURC electric weighted average cost of capital, excluding the adjustment for ADIT ordinarily included in the state-based calculation, of 8.11% at June 30, 2026.[60] NIPSCO grossed up the weighted cost of common stock by a Conversion Factor of 1.331 to arrive at a pre-tax weighted cost of common stock.[61] The pre-tax weighted average rate of return of 9.70% was then divided by four to arrive at the Quarterly Rate of Return of 2.42%.[62] The Direct Testimony of Josh Figueroa of The Brattle Group ("Figueroa Testimony") confirms that NIPSCO's use of its capital structure is reasonable[63] and use of the state-approved 9.75% ROE is reasonable, and may even be conservative under the circumstances.[64]

2. Depreciation

The Quarter 2 Order Costs include Depreciation and Amortization Expense in the amount of $3,488,690 associated with the continued operation of the Impacted Schahfer Units pursuant to the DOE Orders.[65] As of March 1, 2026, NIPSCO began depreciating the Impacted Schahfer Units in accordance with a February 18, 2026 IURC Order on Settlement[66] whereby the revised depreciation rates will depreciate the original cost of plant so that the aggregate net plant on June 30, 2034 will net to approximately zero.[67] Utilizing these revised IURC rates provides a significant decrease in depreciation expense per month.[68] FERC separately accepted NIPSCO's request for approval of its depreciation rates effective March 1, 2026, for utilization in its MISO formula rates in FERC Docket No. ER26-2608.[69]

Drs. Celebi and Newell agree that it is appropriate to recover the return of and on the undepreciated capital invested in the Impacted Schahfer Units because, although the Impacted Schahfer Units were scheduled to retire, the units are now being used for a regional purpose and are thus used and useful for that purpose.[70] Drs. Celebi and Newell explain that the Impacted

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59 *Id*.

60 *Id.*

61 *Id.* at 8-9.

62 *Id*. at 11.

63 Figueroa Testimony at 9.

64 *Id.*at 12-13.

65 Blissmer Testimony at 9.

66 IURC Cause No. 46120-S1.

67 Blissmer Testimony at .

68 *Id.* at 12.

69 *Id.* at 13; *N. Ind. Pub. Serv. Co. LLC*, 196 FERC ¶ 61,054 (2026).

70 Celebi/Newell Testimony at 20-21.

Schahfer Units economic value is created not just by the repairs, but also by "the past capital expenditures that made the plants exist so that they could become available now."[71]

3. Fuel Costs

NIPSCO is presenting a total of $34,168 in Fuel Costs for approval.[72] These costs include a minor amount of natural gas consumed to maintain the facilities while repairs are being completed.[73]

4. Operations and Maintenance Costs (Labor and Non-Labor Related)

NIPSCO is requesting approval of $54,303,706 in O&M costs.[74] Included in this category are $40,332,823 of repair expenses that would normally be considered Construction Work in Progress and Retirement Work in Progress capital costs but for the DOE Orders.[75] This is entirely due to the short-term nature of these orders and the fact that there is no assurance that subsequent orders will be issued or how long the issuance of such orders may continue.[76] Because of the uncertainty, the projects do not meet NIPSCO's capitalization policy requirements and are instead treated as periodic repair expense.[77]

Also included here are labor-related, and non-labor-related costs associated with operations and maintenance of the Impacted Schahfer Units. Labor-related costs for O&M include the direct costs for personnel assigned to operate and maintain the Impacted Schahfer Units.[78] Non-labor-related O&M costs includes chemicals, fuel handling, and other direct costs of maintaining the Impacted Schahfer Units.[79]

5. Administrative & General Expenses

NIPSCO is presenting a total of $268,713 in A&G Expenses.[80] These costs include Outside Services costs for direct legal costs associated with the DOE Orders and include costs to assist with preparing this filing. Other A&G costs include property insurance and worker's compensation expense.[81] As part of this filing, NIPSCO has decided not to include employee

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71 *Id*. at 21.

72 Blissmer Testimony at 12.

73 *Id*.

74 *Id.* at 13.

75 *Id*.

76 *Id*.

77 *Id*.

78 *Id.* at 15; Pollard Testimony at 20-21.

79 Blissmer Testimony at 14.

80 *Id.* at 14.

81 *Id.* at 14.

benefit costs such as medical insurance and pension expense, or other corporate A&G costs, because it is not fully clear how many orders will be issued by DOE for the continued operation of the Impacted Schahfer Units, and the administrative expense of determining the appropriate amounts for Quarter 2 2026 seems unnecessary at this time. NIPSCO reserves the right to support recovery of these costs in future filings.

Direct Legal Costs associated with the DOE Orders continue to be incurred. Examples of ongoing legal costs include NIPSCO's participation in legal proceedings involving third-party challenges to the validity of the December 2025, March 2026 and June 2026 DOE Orders as well as the Order on Complaint (and therefore directly implicating NIPSCO's compliance obligations). Because of the ongoing nature of the Direct Legal Costs, and to reduce administrative burden, this cost recovery filing only includes Direct Legal incurred through the end of the June 2026. NIPSCO will address Direct Legal Costs of the DOE 202(c) orders on a rolling basis, as described above, based on costs invoiced during a given 90-day order duration period.

6. Other Taxes

NIPSCO is presenting a total of $998,260 in Other Taxes.[82] These costs include the Impacted Schahfer Units' property taxes and employer payroll taxes.[83] The estimated property tax accrued for Quarter 2 2026 was based on the gross plant value of Impacted Schahfer Units on December 31, 2025. Employer payroll tax expense was calculated at 7.65% of direct labor expense.[84]

D. Carrying Costs

Carrying costs identified for Quarter 2 2026 are $762,359.[85] NIPSCO calculated an interest-only cost of carrying an average net regulatory asset balance, less other revenue received, for Quarter 2 2026 using FERC's Electric Interest Rate for the same period.[86] The average net regulatory asset balance, less other revenue received, upon which the carrying cost is calculated is comprised of the deferred expenses required to comply with the DOE Orders, less the amounts received from the MISO markets as well as estimated amounts of collection under NIPSCO's retail Tariff associated with the Impacted Schahfer Units.[87] Mr. Figueroa supports NIPSCO's request to recover carrying costs stating that it is reasonable because it compensates NIPSCO for the

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82 Blissmer Testimony at 14.

83 *Id.*

84 *Id.*

85 *Id.* at 17.

86 *Id.*

87 *Id.*

difference in timing from when the compliance costs were incurred to when those cost can be recovered from the relevant MISO ratepayers and consistent with Commission precedent.[88]

V. Request for Approval and Basis for Recovery of Quarter 2 Order Costs

A. Recovery of the Costs Associated with a DOE 202(c) Order is Appropriate by Statute and as Mandated by the U.S. Constitution

The Complaint Order approved the cost allocation mechanism and method for the costs associated with the DOE Orders to be recovered. NIPSCO has a right to recover such actual costs, net of market revenues based on the plain language of the statute, DOE's directive, the Complaint Order, and the U.S. Constitution.

First, NIPSCO's recovery right is confirmed by the plain language of FPA section 202(c), which states, "[i]f the parties affected by such order fail to agree upon the terms of any arrangement between them in carrying out such order, the Commission, after hearing held either before or after such order takes effect, may prescribe by supplemental order such terms as it finds to be just and reasonable, including the *compensation or reimbursement which should be paid* to or by any such party."[89]

Second, DOE specifically granted NIPSCO the right to recover its costs, confirmed in the language of the December 2025 DOE Order (and the March 2026 DOE Order and June 2026 DOE Order) itself which states, "[r]ate recovery is available pursuant to 16 U.S.C. § 824a(c)."[90] The Commission affirmed this in its Order on Complaint and Order on Rehearing.[91]

Finally, recovery of costs associated with a section 202(c) order is mandated by the Fifth Amendment of the U.S. Constitution, which prohibits the federal government from taking private property for public use without just compensation.[92] It is well-established that a utility providing regulated service is entitled to recover its full cost of service, including "all operating expenses, including depreciation, depletion, and taxes, plus a fair return on the rate base."[93] Rates that "are not sufficient to yield a reasonable return on the value of the property used at the time it is being

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88 Figueroa Testimony at 17-18.

89 16 U.S.C. § 824a(c)(1) (emphasis added).

90 December 2025 DOE Order at ordering Paragraph E.

91 Order on Complaint at P 40 (noting that NIPSCO can petition the Commission in a separate proceeding "to recover specific DOE Order Costs…"); Order on Rehearing at P 37.

92 U.S. Const. Amend. V ("[N]or shall private property be taken for public use, without just compensation").

93 *Wis v. Fed. Power Comm'n*, 373 U.S. 294, 298 n.6 (1963); *see also Ala. Power Co. v. FERC*, 160 F.3d 7,8 n.1 (D.C. Cir. 1998); *Chi. v. Fed. Power Comm'n*, 458 F.2d 731, 734 (D.C. Cir. 1971).

used…are confiscatory."[94] These principles are fundamental to the regulatory compact underlying governmental regulation of private utilities, under which, "[t]he utility is not a servant to the state; it is a for-profit enterprise which incurs legal obligations in exchange for state-conferred benefits."[95] In the context of the Commission's ratemaking authority under sections 205 and 206 of the FPA, courts have long recognized that the Fifth Amendment prohibits the Commission from imposing "confiscatory" rates.[96]

The foregoing precedent arises in the context of rates established under FPA sections 205 and 206, where the utility has voluntarily undertaken jurisdictional service obligations. Those constitutional protections apply with even greater force where, as here, the utility is compelled by the federal government to continue operating a generating unit pursuant to FPA section 202(c). Any contrary result would render the DOE Orders constitutionally infirm under the Takings Clause because it would compel the provision of service without constitutionally adequate compensation.

Nothing in the Consumers Energy Opinion suggests any other outcome. As an initial matter, all of the Quarter 2 Order Costs at issue here were incurred prior to the issuance of the D.C. Circuit's opinion in the Consumers Energy case. Further, the finding in that case was limited to one emergency order issued pursuant to FPA section 202(c) and directed to Consumers Energy – DOE Order No. 202-25-3. Specifically, the D.C. Circuit held that the DOE exceeded its statutory authority in issuing an order under section 202(c) of the FPA directing Consumers Energy Company's J.H. Campbell generating plant to remain in operation beyond its scheduled retirement.[97] The opinion recognizes that Consumers' right to recover the costs associated with the DOE order from ratepayers is at issue in separate proceedings currently pending before FERC but does not make any determination regarding cost recovery.[98] The DOE Orders giving rise to NIPSCO's requested recovery here were not at issue in the Consumers Energy proceeding and FERC has jurisdiction over this request to recover the costs incurred by NIPSCO to comply with orders issued by DOE.[99]

B. Quarter 2 Order Costs Include Fixed and Variable Costs

Although the legal authority underlying continued operation of a generating facility under FPA section 202(c) differs from the authority governing continued operation of MISO System Support Resources ("SSR") pursuant to the MISO Tariff, the relevant circumstances are

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94 *Bluefield Water Works & Improvement Co. v. Pub. Serv. Comm'n*, 262 U.S. 679, 690 (1923).

95 *Jersey Cent. Power & Light Co. v. FERC*, 810 F.2d 1168, 1189 (D.C. Cir. 1987).

96 *See e.g., FPC v. Hope Natural Gas Co.*, 320 U.S. 591 (1944) ("*Hope*"). In *Hope*, the Supreme Court explained that rates must permit a return commensurate with that earned by enterprises facing comparable risks and must also satisfy a standard of integrity and sufficiency.

97 Consumers Energy Opinion at 6-7.

98 Id. at 4.

99 *See MediNatura, Inc. v. Food & Drug Admin.*, 496 F. Supp. 3d 416, 444 (D.D.C. 2020) ("Even ultra vires agency policies carry the force of law until invalidated by a court.").

sufficiently analogous that Commission precedent addressing recovery of fixed costs for SSR units is highly instructive here.

The Commission has specifically determined that SSR units are entitled to recover fixed costs, and that limiting recovery only to "going-forward costs" would be unjust and unreasonable.[100] The Commission's rationale for SSR units applies with equal force in this proceeding. The same legal and equitable principles support recovery of the fixed costs associated with maintaining the Impacted Schahfer Units' availability pursuant to the DOE Orders and any subsequent related orders and demonstrate that denying such recovery would be likewise unjust and unreasonable.

Moreover, the instant circumstances deviate from typical ratemaking because while capital investments are needed to maintain reliable operations, the operating period is both very short and highly uncertain in total duration. Drs. Celebi and Newell note that in the SSR context, FERC precedent supports NIPSCO's recovery of fixed costs, including depreciation and a return on existing rate base.[101] NIPSCO's approach to recover both fixed and variable costs is appropriate.

C. There Will Be No Double Recovery of Fixed Costs

FERC should reject any argument that NIPSCO's fixed costs associated with the Impacted Schahfer Units are already being recovered through retail rates approved by the IURC. The IURC's June 26, 2025 Order on Settlement approved NIPSCO's current retail rates and charges for electric service, which reflect a $70 million reduction associated with ongoing operations and maintenance and fuel expense for the Schahfer Units. In accordance with a February 18, 2026 IURC Order,[102] NIPSCO classified the Net Book Value of the Schahfer Units as a regulatory asset as of December 31, 2025, recorded straight-line depreciation expense consistent with the previously approved period ending June 30, 2034 for the Schahfer Units, and reclassified depreciation expense to amortization expense for the Schahfer Units in the Cause No. 46120 Step 2 revenue requirement for ratemaking purposes. To the extent NIPSCO recovers any costs under proposed Schedule 56 that are included in its retail rates approved by the IURC, NIPSCO will reflect that recovery in a regulatory liability to reduce retail rates.

VI. Effective Date and Request for Waiver

NIPSCO respectfully requests that the Commission approve the Quarter 2 Order Costs and establish an effective date of December 23, 2025, the effective date approved by the Commission in the complaint proceeding in FERC Docket No. EL26-36 and the same effective date that will be requested by MISO for Schedule 56.

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[100] *Midcontinent Indep. Sys. Operator, Inc.*, 148 FERC ¶ 61,057 at P 84 (2014).

[101] Celebi/Newell Testimony at 22.

[102] IURC Cause No. 46120-S1.

To the extent necessary, NIPSCO respectfully requests waiver of such additional filing requirements as might otherwise apply including, but not limited to, those found in Part 35 of the Commission's regulations.

Because Schedule 56 is the operative rate schedule needed to effectuate cost recovery under the MISO Tariff, NIPSCO intends to begin recovery of the Quarter 2 Order Costs beginning on the first day of the month following a 60-day notice period. Specifically, NIPSCO will request MISO to include the Quarter 2 Order Costs identified in this application for recovery through Schedule 56 on the first day of the month following a Commission order in the expected MISO compliance filing to include Schedule 56 in the MISO Tariff.

VII. Other 18 C.F.R. § 35.12 Filing Requirements

NIPSCO provides information in compliance with, or requests waiver of, the requirements of Section 35.12 of the Commission's regulations below. NIPSCO respectfully requests waiver of any other requirement of Section 35.12 or any other provision of Part 35 of the Commission's regulations that may be deemed necessary to permit the Commission to accept the Quarter 2 Order Costs, effective December 23, 2025. NIPSCO provides or requests waiver of the following:

- 18 C.F.R. §§ 35.12(a), 35.12(b)(1), (2), (3), (5): A description of, basis for, and support for the Quarter 2 Order Costs is provided in this letter and the accompanying attachments. There are no costs that have been included with this filing that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices. To the extent necessary, NIPSCO requests waiver of the requirement to provide Statement BL and a comparison of the rate for similar services.

- 18 C.F.R. § 35.12(a): As noted below, NIPSCO has provided a copy of this filing to MISO, the IURC, the Indiana Office of Utility Consumer Counselor and MISO's Independent Market Monitor.

- To the extent necessary, NIPSCO requests waiver of any other requirement of 18 C.F.R. § 35.12 or any other section of Part 35 of the Commission's Regulations.

VIII. Notice and Service

NIPSCO has served a copy of this filing upon MISO, the Indiana Utility Regulatory Commission, Indiana Office of Utility Consumer Counselor, and MISO's Independent Market Monitor.[103]

[103] § 35.12(b)(3).

IX. Communications

All correspondence and communications regarding this Complaint should be addressed to the following persons:

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X. Contents of the Filing

NIPSCO is submitting the following documents in support of this application:

1. This Transmittal Letter;

2. Exhibit Nos. NIP-100 to NIP-101: Direct Testimony and Exhibit of Kevin J. Blissmer;

3. Exhibit No. NIP-200: Direct Testimony of Karl E. Stanley;

4. Exhibit No. NIP-300: Direct Testimony of Rockey Pollard;

5. Exhibit No. NIP-400 to NIP-401: Direct Testimony and Exhibit of Dr. Metin Celebi and Dr. Samuel A. Newell; and

6. Exhibit No. NIP-500 to NIP-501: Direct Testimony and Exhibit of Josh Figueroa.

XI. Conclusion

For the foregoing reasons, NIPSCO respectfully requests that the Commission accept the Quarter 2 Order Costs, effective December 23, 2025.

Respectfully submitted,



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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-46
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	)))))	Order No. 202-26-47

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 211
NERC Incident Report

Incident Review

Load-Pocket Shoulder Season Challenges

Primary Takeaways

In recent years, shoulder seasons have become increasingly challenging for bulk power system (BPS) operators to manage. This review details 4 of 6 incidents over a 13-month period that resulted in pre-contingent load shedding. All these load-shed incidents had similar contributing circumstances: All incidents occurred during what is commonly known as the "shoulder seasons" and had unavailable generation that was either planned or unplanned, unavailable transmission that was either planned or unplanned, and more load than forecasted. Load was shed in all instances because of real-time contingency analysis (RTCA) results that indicated significant issues related to the next loss of a transmission element. These issues would have involved either significant overloads that could lead to cascading or significantly low voltages bordering on voltage instability.

During RTCA, which is important for operating the power system, analysis is performed on the system's current operating state. This differs from operational planning analysis (OPA), which studies the system for forecasted operating conditions. Very often, the real-time operating conditions are different than the forecasted operating conditions.

RTCA is the safety net used to ensure that the system is operating in a secure state in its current configuration and loading levels. Planned and unplanned outages, variable energy resources (VER), and variable weather conditions leading to variations in load can drive real-time conditions that necessitate load shed to maintain BPS reliability.

Background

Shoulder seasons are the spring and fall periods that are between the summer and winter peak load periods. These seasons have historically been used for planned BPS maintenance and construction in preparation for the upcoming peak load season. For instance, generating resources require periodic maintenance to ensure their availability during peak seasons. This periodic maintenance requires an outage of the generating facility. Market rules and other economic incentives have caused generation planned maintenance outages to be concentrated into the shoulder seasons, leading to increasing numbers of generators being out for maintenance simultaneously. Additionally, transmission lines require periodic maintenance, such as insulator, crossarm, or structure replacement, leading to planned outages during shoulder seasons.

Furthermore, the BPS is in a cycle of growth and transition, and significant new transmission development is occurring. To facilitate the construction of new transmission facilities, outages on existing BPS transmission facilities are required. This work is also concentrated in the shoulder seasons.

Historically, BPS reserve margins have been sufficient for the shoulder seasons to accommodate these outages without much difficulty, but reserve margins have shrunk in recent years. In its *2024–2025 Winter Reliability Assessment*,[1] NERC identified significant reductions in thermal generation from the previous winter. In many instances, this thermal generation has been replaced by VERs, such as wind and solar. However, VERs present

[1] https://www.nerc.com/globalassets/programs/rapa/ra/nerc_wra_2024.pdf

challenges and uncertainties for system operators in combination with facility outages during the shoulder seasons.

Another factor is load magnitude, of which temperature was historically the major driver with the largest percentage of load being residential and commercial building cooling and heating. Cold temperatures in the winter and hot temperatures in the summer caused loads to peak in those seasons, with lower loads in the shoulder seasons. However, loads that have a flat demand curve regardless of temperature have recently grown significantly, causing the delta between peak and shoulder seasons to shrink. Temperatures in the shoulder seasons were also historically temperate, meaning that operators could count on temperature-sensitive load to not be high in magnitude. In recent years, shoulder season temperatures have varied more significantly than historical norms. Compounding the challenges, especially in spring, thunderstorms and tornadoes create unplanned (forced) equipment outages.

All these factors must be considered when determining whether to grant equipment outage requests. The outages are typically planned weeks, if not months, in advance, as operators must forecast system conditions to determine whether the outage request is feasible. If conditions are much different than those predicted weeks or months earlier, load shed may be required to maintain a secure operating state, which is what occurred in the incidents described in this incident review.

Summary of the Incidents

This incident review summarizes four shoulder season load-shed incidents. Each is unique, but all share some of the aforementioned common difficulties. These incidents all occurred in a smaller area within a Balancing Authority (BA) area footprint, referred to as a load pocket.[2] Load pockets have varying degrees of transmission lines that connect the pockets to the larger grid. Energy imports on these transmission lines, along with the generation internal to the load pocket, serve as the energy source for load within the pocket. The magnitude of the load within the pocket, offset by the internal generation, determines the import capability that is needed to serve the load pocket. The needed import capability determines the required number or total capacity of the connecting transmission lines. Entities will sometimes create a transmission "ring" around the load pocket. Conceptual diagrams of simple and complex load pockets are depicted in **Figure 1** and **Figure 2**.

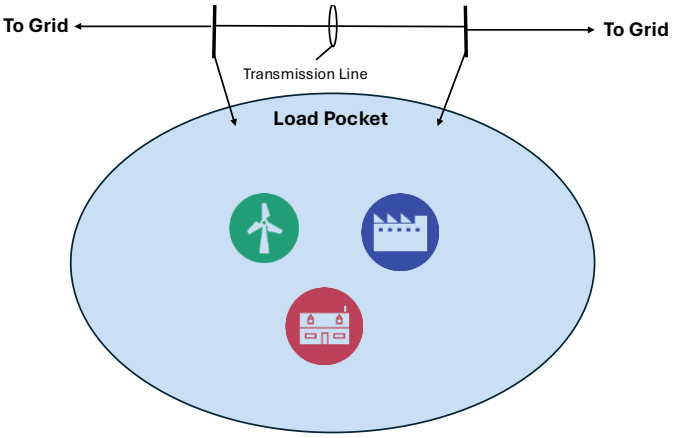


Figure 1: Simple Load Pocket

[2] A "load pocket" is a concentrated area of load that typically contains some generation.

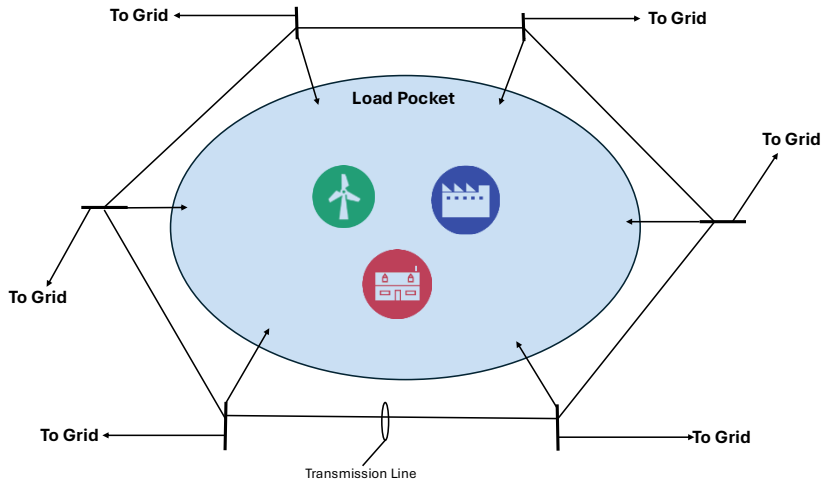


Figure 2: Complex Load Pocket

Incident Details

Entity A Incidents

Entity A experienced three load-shed incidents in the same load pocket in 2024 and 2025. Details are included for two of those incidents. This load pocket has seen rapid and significant load growth in the past few years, driving increased reliability risk in the shoulder season. Transmission projects are planned to increase the capacity into the load pocket but are still a few years from being in service. Consequently, the capacity margin for this load pocket, which contains a substantial amount of VERs consisting of wind and solar facilities, has been reduced from previous levels.

Each of the three incidents contained a combination of the following contributing factors:

- Unavailable Generation
  - Planned Maintenance Outages
  - Unplanned/Forced Outages
  - Low Wind Generation Output
  - Solar Generation Evening Ramp Down
  - Emission Constraints

  Planned and unplanned generation outages or derates within the load pocket contributed to these incidents. Unavailable generation internal to the load pocket places an increased need for capacity on the transmission lines that connect the load pocket to the rest of the electric grid.

- **Load Forecast Error**
  In each incident, there was a significant difference between actual and forecast load, with a significant portion of this extra load attributable to line losses on the transmission system. These increased losses

resulted from increased power flow on the transmission system due to reduced generation output internal to the load pocket.

- **Transmission Outages**
  - Planned Outages
  - Unplanned/Forced Outages

  In both the load-shed incidents being examined, unplanned/forced outages of 345 kV transmission lines due to faults contributed significantly to the potential voltage instability.

- **Solar Generation Evening Ramp Off**
  Evening solar generation ramp down presents a significant challenge for grid operators, as, in the shoulder seasons, it coincides with the daily peak load. In one of Entity A's incidents, the solar generation ramp down from 200 MW at 18:30 to 25 MW at 19:30 was coincident with the entity's daily peak load and coincided with minimum wind generation internal to the load pocket.

- **Low Wind Generation Output**
  This load pocket contains a significant amount of wind generation, but during one of the load-shed incidents, the wind generation was approximately 2% of nameplate.

Incident 1

In this April event, a 345 kV transmission line was forced out of service due to a sustained fault. This outage, coupled with a planned maintenance outage on another 345 kV line, resulted in an increased dependence on generation internal to the load pocket due to decreased transmission import capability. Low wind speeds that day resulted in only 100 MW of wind generation internal to the load pocket, compared to 4,700 MW of nameplate capacity. As peak load was approaching later in the day, a generator inside the load pocket that was planned to help meet the daily peak load failed to start. At very close to the same time, the solar evening ramp off also began with solar ramping down from 200 MW to 25 MW in one hour, coincident with load ***increasing*** to its daily peak value. RTCA, when accounting for these transmission and generator outages/unavailability, indicated that voltage instability would occur with the next contingency, requiring the operators to shed load pre-contingency. To return the system to a secure operating state as soon as possible, the operators shed approximately 150 MW of load.

Incident 2

In this March event, the load pocket experienced a significant internal unforecasted wind generation reduction that led to increased flows on the transmission system, resulting in increased line losses. At the time of the unexpected wind generation reduction, there were extensive planned and unplanned/forced outages of flexible/dispatchable generation, which is a key element to respond to unplanned/unforecasted generation shortages. Additionally, a key 345 kV transmission line was out of service for planned maintenance.

The generation reduction, increased flows, and resulting increased line losses on the transmission system led the RTCA to indicate voltage instability in the pocket for the next contingency. This circumstance required the operator to shed load pre-contingency—specifically shedding 122 MW of load to return the system to a secure operating state as quickly as possible.

Entity B Incidents

Entity B experienced two load-shed events in the same load pocket in April 2025. Both incidents were prompted by RTCA analysis indicating voltage instability—severe enough to require pre-contingent load shedding—for a next contingency loss. These incidents resulted in load sheds of 115 MW and 140 MW, respectively, to maintain reliability of the BPS. This load pocket has experienced significant generation retirements during the last 10 years, resulting in less reserve margin within the load pocket and leading to less flexibility for operators to respond to unanticipated conditions.

Contributing Factors for the April 26 Incident[3]

Generation planned maintenance outages contributed significantly to this incident, as 3,000 MW of generation was unavailable due to planned maintenance outages inside the load pocket. At the time of the outage requests months earlier, analysis did not reveal any issues with the outages based on the forecasted assumptions.

A 345 kV line and a dc tie transmission line were out of service on the day of the incident, significantly reducing the import capacity into the load pocket.

Grid operators perform OPA studies to identify any potential issues for the next-day operating conditions. This gives the grid operator time to develop mitigations for any identified issues. This analysis must use forecasted conditions, such as load, generation, and network topology. Differences between the actual real-time conditions and those forecasted in the OPA could result in unanticipated challenges. In this instance, a few real-time differences arose, as follows:

- The load pocket experienced a high temperature exceeding the daily forecast by approximately 5 degrees, resulting in a load 300 MW over the forecasted load.
- A 185 MW natural-gas-fired unit was off-line in real time.
- The network power flow differed significantly from the flow predicated in the OPA, which anticipated a north to south power flow. The actual flow in real time during the incident was south to north.

In addition to the grid operator performing day-ahead reliability planning studies, the market function performs day-ahead market analysis to determine the generation plan for the next day. As the market analysis determined that a 348 MW natural gas generator internal to the load pocket was not needed for economic or reliability purposes, the unit was placed in reserve shutdown mode.

Entity C Incident

In this May incident, a combination of extensive planned and unplanned generation outages, higher-than-forecasted load, and a critical 500 kV transmission line outage led to a transmission system emergency resulting in a need to shed 600 MW of load to maintain reliable operations.

Both planned and unplanned generation outages internal to the load pocket contributed significantly to this incident; 74% of the generation internal to the load pocket was unavailable on that day, and a 500 kV transmission line had previously been forced out of service due to structure failures caused by severe weather.

[3] 4-26-2025 Load Shed Event

These factors led to a 1,732 MW decrease in transmission capacity into the load pocket. In total, the load pocket's available capacity was reduced by 9,332 MW.

Table 1: Load Pocket Capacity Reductions	
Load-Pocket Unavailable Generation	**Reduction (MW)**
Planned Outages	2,600
Unplanned Outages	3,900
Derates	1,100
Total	7,600
Unavailable 500 kV line Capacity	1,732
Total Unavailable Capacity Into Load Pocket	9,332

Additionally, the temperature in the load pocket on that day was 92 degrees, approximately 5 degrees hotter than normal, resulting in a substantial increase in load and causing the actual load to exceed the forecasted load level.

The day prior to the load-shed incident, operators identified that a 230 kV line would overload if the loss of a 500 kV line occurred. The day-ahead analysis did not indicate an overload greater than 125%, and a plan was formulated to initiate post-contingent load shed to alleviate the overload should the 500 kV line be lost.

On the day of the load shed, the increased transmission line loading resulted in the need to adjust the system to address other transmission lines exceeding their rating. These adjustments, in addition to the increased loading, resulted in the RTCA indicating that the overload on the 230 kV line was greater than 125% for the next worse contingency: the loss of the 500 kV line.

The entity's operating procedure states that contingent overloads greater than 125% require further analysis to assess the potential for cascading. If this analysis identifies a load loss of 1,000 MW or more when removing elements loaded greater than 125%, a temporary interconnection reliability limit (TIROL) is identified and pre-contingent load shed is required, as happened on this day for the entity. After the TIROL was identified, the entity declared a transmission system emergency and initiated 600 MW of load shed to alleviate the TIROL.

Future Considerations

All these incidents occurred in shoulder seasons. Each incident had significant amounts of planned and unplanned outages, higher-than-forecasted temperatures, and RTCA results for a next contingency that required pre-contingent load shedding.

As interconnections are changing in both resource mix and load characteristics coupled with weather variability during shoulder seasons, a different approach may be needed when coordinating facility outages. Entities should consider the following:

- Planning a higher level of operating margin and committing additional generation in load pockets to account for larger real-time variabilities in generation, load, and weather
- Including demand-side management in the mitigation plans for insufficient capacity in load pockets
- Considering more extreme scenarios when determining which outage requests to approve

- Considering PRC-023 loadability requirements when determining contingent overload thresholds that trigger cascading analysis
- Periodically revisiting planned outages and considering updated and expected system conditions to determine whether such outages should be postponed
- In market areas, reviewing processes to ensure that reliability studies (OPA) are using accurate generation dispatch and availability as determined from the latest day-ahead market analysis (Coordinating processes that eliminate discrepancies between the day-ahead market unit commitment plan and the OPA studies.)

For more information, please contact:
NERC – Event Analysis

Date of Publication: March 4, 2026