

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-171
Colorado PUC March 31, 2026 Decision

Decision No. C26-0200

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 24A-0442E

IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR APPROVAL OF ITS 2024 JUST TRANSITION SOLICITATION.

**COMMISSION DECISION ADDRESSING
APPLICATION FOR REHEARING, REARGUMENT,
OR RECONSIDERATION OF COMMISSION DECISION
NO. C26-0121**

Issued Date: March 31, 2026
Adopted Date: March 25, 20226

I. BY THE COMMISSION

A. Statement

1. Through this Decision, the Commission addresses the Application for Rehearing, Reargument, or Reconsideration (“RRR”) of Decision No. C26-0121 filed on March 16, 2026, by Public Service Company of Colorado (“Public Service” or the “Company”). Consistent with the discussion below, we grant, in part, the Company’s RRR.

B. Background

2. We have previously detailed the background and procedural history of this case in Decision No. C25-0747, issued November 6, 2025 (the “Phase I Decision”) and Decision No. C26-0121, issued February 24, 2026 (the “First RRR Decision”). Here, we provide only the background necessary for this Decision addressing Public Service’s RRR of the First RRR Decision.

3. On November 26, 2025, Public Service, the East Metro Area Business Coalition (“EMABC”), the Coalition for Community Solar Access (“CCSA”), and several other parties filed RRR regarding the Commission’s Phase I Decision. Among other topics, these RRRs sought reconsideration on the Commission's directives regarding the inclusion of new large load customers in the load forecast, updated Phase I modeling, and the calculation of the Denver Metro transmission credit.

4. In the First RRR Decision, the Commission denied as premature the RRR proposal from Public Service and EMABC to pursue a “TG Window” approach for new large loads. Under their proposed RRR TG Window concept, Public Service could contract with large load customers by signing updated electric service agreements (“ESA”) and interconnection agreements (“IA”) without the fair notice provision.

5. We denied this RRR request as premature, citing cost and risk allocation issues. The Commission found that, “until the adjudication of the large load and clean transition tariffs, there is considerable risk that new large loads will impose additional costs on the grid that necessitate changes in rates.”¹ In addition, the Commission set forth three directives for the upcoming large load tariff filing. First, the Commission directed the Company to include in its direct case “an alternative that assumes that these new large loads constitute a separate, unique rate class responsible for the costs they impose on the system in addition to any proposal that the Company may choose to submit.”²

6. Second, in paragraphs 43 and 44 of the First RRR Decision, we ordered the Company to present in the large load tariff “an evaluation of the costs of the proposed large load

¹ First RRR Decision at ¶ 47.

² First RRR Decision at ¶ 42.

tariff assuming that the large new loads required a new [combustion turbine (“CT”)] plus a reserve margin to be built as calculated based on the most recent gas CT bid prices received.”³ The Commission reasoned the simplest and most transparent way of quickly estimating the incremental system costs that new large loads impose is likely to assume that the capacity requirements of these customers are met by new CTs plus a planning reserve margin.

7. Third, the Commission directed Public Service to include an alternative structure that would reward new large load customers who locate outside the Denver Metro area or flexibly reduce their demand during critical system peak hours.⁴

8. In the First RRR Decision, the Commission also issued directives regarding the Denver Metro transmission credit. In its direct case, Public Service proposed a \$191/kW modeling credit for resources interconnecting to the transmission system within the Denver Metro constraint. In the Phase I Decision, we largely approved of this transmission credit but directed the Company to perform additional comparative transmission modeling to fix certain deficiencies in the calculation of the credit.⁵

9. In the First RRR Decision, the Commission agreed with CCSA’s contention about an error in the calculation of the Denver Metro transmission credit. The Company had calculated the \$191/kW modeling credit by evaluating the change in modeled transmission costs between two fictional but plausible portfolios of generic resources—one with only 150 MW of distributed energy resources (“DERs”) and one with 900 MW of DERs. The difference in costs between these two portfolios was divided by the difference in DER MW to arrive at the \$191/kW modeling credit. CCSA’s RRR argument, which we found convincing, was that 15 percent of the DER in the

³ First RRR Decision at ¶ 42.

⁴ First RRR Decision at ¶ 45.

⁵ Phase I Decision at ¶ 366.

Company's modeling was located outside of the constraint, so the denominator in the credit calculation should be only 85 percent of the incremental DER that was actually modeled as being located within the constraint. We granted CCSA's RRR but also agreed with the Company's concern about false precision in the calculation.⁶

10. Separately in the First RRR Decision, the Commission granted, in part, the Company's RRR request to extend the time to submit updated Phase I modeling. At the same time, the Commission refined the requirements for the updated Phase I modeling, including by requiring Public Service to incorporate the \$191/kW Denver Metro transmission credit into the modeling. The Commission directed Public Service to file the updated Phase I by April 2, 2026.

C. Discussion

1. Large Load Tariff Filing Requirements

a. Public Service's RRR

11. In its RRR, Public Service now seeks reconsideration of the Commission's requirement to present in the large load tariff filing an evaluation of the costs of serving new large loads based on the price of new CTs. Public Service first argues that attempting to "tag" new generation units and allocate all associated costs to a particular rate class is inconsistent with how the Company runs its system, the State's emissions reduction goals, and accepted methods of cost allocation. Public Service argues that customers draw power from the grid as a whole, and thus the Company does not attempt to assign the costs of particular generation units. According to Public Service, "[t]he Commission has long approved this approach, which is the standard for

⁶ First RRR Decision at ¶ 142.

utility rate setting nationwide.”⁷ The Company adds it has serious concerns about the workability and legality of a rate design that assigns the costs of particular generation units.

12. Second, Public Service argues the Commission’s directive to assume that new large loads will be served exclusively by new CTs is contrary to State, Company, and customer emissions reduction goals. Public Service acknowledges new gas units will be needed to reliably serve increasing load but asserts that assuming the large load customers will be served exclusively by CTs is contrary to the emissions reduction goals. Public Service asserts that assigning only CTs to the large load class, instead of a diverse resource mix from the entire system, would inherently be less efficient, sustainable, and cost effective. Instead, the Company argues large loads should be served holistically as part of the Company’s overall system needs. Public Service asserts that this is the approach currently used by the Company’s sister operating companies within Xcel Energy.⁸

13. Finally, Public Service states there is insufficient time to conduct the additional modeling before the April 2, 2026 filing deadline for the large load tariff proceeding. The Company asserts it has already developed its modeling for the large load tariff based on the Phase I decision, reflecting the traditional approach to building generation portfolios. Public Service asserts that updating its transmission modeling or re-optimizing the modeling of generation portfolios to reflect a CT-only approach would take “at minimum several additional weeks” and further delay the large load tariff filing.⁹

⁷ Public Service Second RRR at p. 2.

⁸ Public Service Second RRR at p. 3.

⁹ Public Service Second RRR at p. 3.

b. Findings and Conclusions

14. We grant, in part, Public Service's RRR on this point. At the outset, we are confused by the Company's statements that the additional analysis will require transmission modeling or re-optimized modeling of generation portfolios. Our directive was for Public Service to present an evaluation of the costs of serving new large loads based on the assumption that the capacity costs are \$25/kw-month, consistent with the actual costs of new CTs in the Near-Term Procurement in Proceeding No. 21A-0141E.¹⁰ It is unclear how this analysis requires additional transmission modeling or re-optimization of generation portfolios. Regardless, given the impending April 2, 2026 deadline for the large load tariff,¹¹ we waive the First RRR Decision's requirement to include this additional analysis as part of the Company's direct testimony. That said, we stop short of eliminating this requirement entirely. This analysis will be submitted at some point in the large load tariff proceeding. In its direct testimony filed in the large load tariff proceeding, Public Service shall specify when it will be able to provide this analysis, which shall be no later than the typical time period for supplemental direct testimony.

15. In addition to the timing issues, Public Service asserts that allocating the costs of particular generation units to a single rate class is inappropriate and that assuming large loads will be served exclusively by CTs contravenes emissions reduction goals. Resolution of such arguments will take place in the actual large load tariff proceeding. For purposes of this JTS Proceeding, however, we stand by our findings that allowing new large loads onto the system under the current rate structure may result in existing customers unfairly subsidizing the higher

¹⁰ First RRR Decision at ¶ 43.

¹¹ Through Decision No. C26-0155 issued in Proceeding No. 26V-0048E (March 11, 2026), the Commission granted Public Service's request for variance from Paragraph 81 of the Phase I Decision and extended the deadline for the Company to file the large load tariff from January 31, 2026, to April 2, 2026.

costs of serving these large loads. The Company has not shown that its large load proposals are in the public interest.

2. Calculation of the Denver Metro Transmission Credit

a. Public Service's RRR

16. In its RRR, Public Service also asks the Commission to allow the Company to use the unrevised calculation of the Denver Metro transmission credit in its updated Phase I Modeling.¹² The Company states that this modeling was already underway following the original Phase I Decision and that the Company does not have sufficient time to redo the transmission modeling by the April 2, 2026 deadline for the updated Phase I modeling.

17. Public Service notes that it does not contest the reasoning for changing the Denver Metro transmission credit calculation and that the Company will apply the revised modeling credit in Phase II of this Proceeding.

b. Findings and Conclusions

18. We grant the Company's RRR on this issue. Given the Company's representation that there is insufficient time to redo the updated Phase I modeling to incorporate the changes in the Denver Metro transmission credit that we directed in our RRR Decision, using the unrevised calculation is appropriate. As Public Service notes, the revised calculation will be used for purposes of Phase II modeling.

¹² Public Service Second RRR at p. 4.

II. ORDER

A. The Commission Orders That:

1. The Application for Rehearing, Reargument, or Reconsideration of Decision No. C26-0121 that Public Service Company of Colorado filed on March 16, 2026, is granted, in part, consistent with the above discussion.

2. The 20-day period provided for in § 40-6-114, C.R.S., within which to file an Application for Rehearing, Reargument, or Reconsideration, begins on the first day following the effective date of this Decision.

3. This Decision is effective upon its Issued Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING
March 25, 2026.**

(S E A L)



ATTEST: A TRUE COPY

Rebecca E. White,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

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MEGAN M. GILMAN

TOM PLANT

Commissioners

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
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Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
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Exhibit 2-172
Tri-State 2026 Annual Resource Adequacy Report

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO**

**2026 ELECTRIC RESOURCE
ADEQUACY ANNUAL REPORTS**

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PROCEEDING NO. 26M-0028E

**TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.'S
NOTICE OF 2026 RESOURCE ADEQUACY ANNUAL REPORT**

Tri-State Generation and Transmission Association, Inc. ("Tri-State"), pursuant to §40-43-104(1)(a), C.R.S., respectfully submits this Notice of 2026 Resource Adequacy ("RA") Annual Report informational filing.

I. BACKGROUND

On or before April 1, 2026, Tri-State, as a load serving entity ("LSE"), is required under §40-43-104(1)(a), C.R.S., to provide the Colorado Public Utilities Commission ("Commission") a RA Annual Report identifying the generating resources and accredited capacity used to serve its Utility Members.¹ On January 1, 2026, the Commission opened Proceeding No. 26M-0028E to receive these reports.

II. TRI-STATE'S 2026 RA REPORT

Tri-State has complied with this requirement with Figure 1 and Table 1.² Tri-State's 2025 RA Annual Report has also been made available on Tri-State's website, here: <https://tristate.coop/resource-planning>.³

¹ The Colorado Resource Adequacy Act of 2023 became effective August 7, 2023 (House Bill 23-1039).

² Colorado Energy Office ("CEO") has requested that entities subject to §40-43-104, C.R.S. also complete a "Resource Adequacy Spreadsheet" to be returned to CEO by April 30, 2026. Tri-State intends to voluntarily respond to this request.

³ On January 11, 2025, Tri-State received guidance from CEO (pursuant to §40-43-104(3), C.R.S.) requiring each LSE to make its RA annual report available on its website and searchable by including "Resource_Adequacy_2026."

FIGURE 1 –LOAD AND RESOURCES

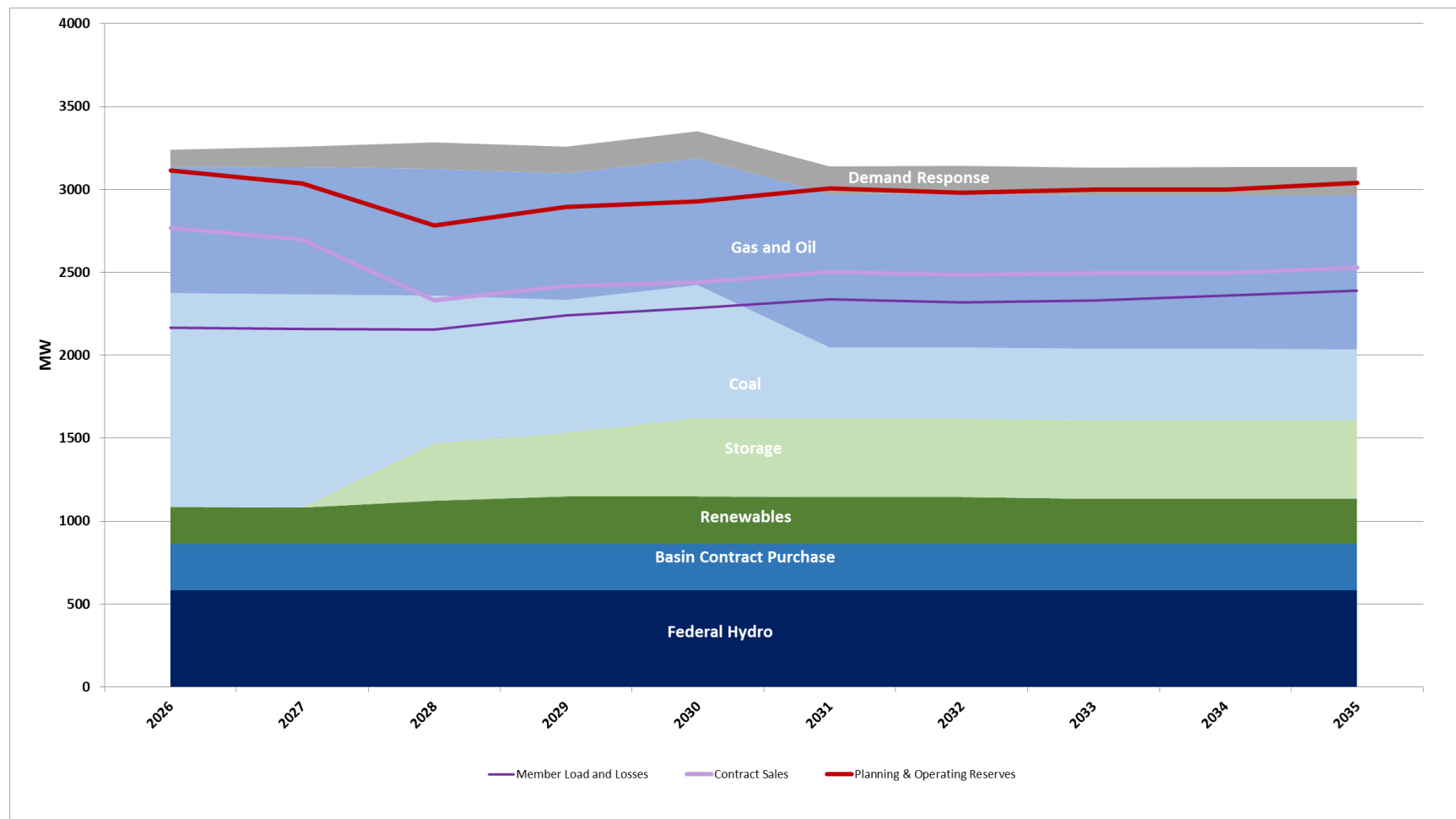


TABLE 1 – LOAD AND RESOURCES

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Federal Hydro	584	584	584	584	584	584	584	584	584	584
Contract Purchases	278	278	278	278	278	278	278	278	278	278
Renewables ⁴	226	222	260	286	286	281	281	272	273	271
Demand Response	100	124	161	162	164	165	167	169	170	172
Coal Generation ⁵	1287	1286	888	800	800	431	432	431	432	431
Gas & Oil Generation ⁶	765	765	765	765	765	925	925	925	925	925
Storage ⁷	0	0	349	383	474	474	474	474	474	474
<i>Total Resources</i>	3239	3257	3285	3259	3351	3138	3141	3132	3136	3135
Member Load and Losses ⁸	2166	2160	2156	2241	2284	2337	2317	2332	2358	2390
Planning & Operating Reserves	348	341	451	476	489	505	498	502	502	511
Contract Sales	601	537	177	177	155	166	166	166	139	139
<i>Total Obligations</i>	2001	1971	1781	1865	1906	1957	1936	1949	1948	1978
Excess Resources	123	219	501	364	422	131	160	133	136	95

⁴ Capacity is based on applying the effective load carrying capability by renewable technology to the nameplate of renewable resources.

⁵ Capacity is based on summer season capacity multiplied by 1 minus the demand equivalent forced outage rate.

⁶ Capacity is based on summer season capacity multiplied by 1 minus the demand equivalent forced outage rate.

⁷ Capacity is based on applying the effective load carrying capability for storage to the nameplate of storage resources.

⁸ Western Interconnection Load.

Tri-State's report covers its Utility Members as LSEs, for the portion of their loads served by Tri-State,⁹ pursuant to §40-43-104(2), C.R.S.

In accordance with §40-43-104(1)(c), C.R.S., Tri-State understands that the Colorado Energy Office will, by July 1, 2026, utilize Tri-State's report and that of other LSEs to create an aggregated statewide report.

Submitted this 17th day of March, 2026.

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⁹ Tri-State expects that certain Utility Members that are exiting Tri-State membership may supply separate RA Annual Reports, to the extent applicable.

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Exhibit 2-173
2024 NREL Lessons from Renewable Integration Studies



Maintaining Grid Reliability – Lessons from Renewable Integration Studies

Paul Denholm, Ilya Chernyakhovskiy, and
Lauren Streitmatter

National Renewable Energy Laboratory

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Maintaining Grid Reliability – Lessons from Renewable Integration Studies

Paul Denholm, Ilya Chernyakhovskiy, and
Lauren Streitmatter

National Renewable Energy Laboratory

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NOTICE

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1 Introduction

In 2023, clean energy resources (including renewables and nuclear power) provided about 41% of electricity in the United States, with more than 16% of total generation provided by wind and solar—called “variable” renewable energy sources because of their daily and seasonal fluctuations in availability (U.S. Energy Information Administration 2024). The bulk power system, which supplies and transmits electricity, maintained high reliability throughout the year, showing that grid reliability is achievable as deployment of wind and solar has increased.

Wind and solar contributions to the nation’s electricity mix are projected to grow significantly—Gagnon et al. (2024) project that wind and solar could provide more than 60% of national electricity generation by 2035 under existing policies. Maintaining high reliability in the bulk power system while increasing renewable resource deployment is a critical priority for electric grid planners, operators, and regulators.

The U.S. Department of Energy (DOE) and other organizations have sponsored numerous research studies over the last two decades to examine the effect of increased wind and solar deployment on grid reliability, including a number of studies that examine grids deriving more than 50% of annual energy from wind and solar. Here, we discuss key findings from both the research body of knowledge and real-world practice related to grid reliability, and we demonstrate how to plan for and achieve continued reliability in the future as wind and solar deployment increase.

1.1 Three Key Issues To Maintaining Bulk System Reliability With Increased Wind and Solar

Maintaining bulk system reliability requires balancing the supply of electricity with demand at various timescales, from less than a second to hours, days, and beyond.¹ Maintaining reliability with increased deployment of wind and solar at scale presents issues that can be summarized into three general categories:

1. **Responding to short-term variability of wind and solar generation.** The fluctuation of variable renewable energy supply was one of the first concerns with wind and solar deployment. Output from these resources can vary over multiple timescales from seconds to hours with limited predictability. This variability and uncertainty can impact how the system is operated, so there has been considerable effort to study ways to mitigate these impacts.
2. **Ensuring enough generation to meet demand during all hours of the year.** Grid planners traditionally focused on meeting demand during peaks, like hot summer afternoons and cold winter nights. But with the growth of wind and solar, focus has shifted to maintaining an adequate mix of resources to meet demand in all hours, particularly where renewables are expected to replace traditional fossil-fueled generators.

¹ For additional discussion of the concept of power system reliability (including formal definitions of reliability elements), see North American Electric Reliability Corporation (2013).

Planning is further complicated by the impact of new loads from electrification, which can also shift the timing of peak demands.

3. **Maintaining stability in the event of a grid disturbance.** One aspect of grid stability that relates to the deployment of wind and solar is frequency stability, or the ability to avoid large changes in frequency after a generator or transmission line failure. The concern is associated with the loss of traditional system inertia as renewable resources like wind and solar displace fossil-fueled resources, whose operating characteristics inherently provide inertia.²

1.2 Summary of Findings

Dozens of studies address various aspects of reliability with the increased deployment of renewable energy resources in regions across the United States. The studies examine contributions from renewables that range from 30% to 100% of total generation and show that these systems can achieve a desired level of reliability if appropriate measures are taken to change how the grid is planned and operated. These measures can be summarized in four categories:

1. **Short-term variability and uncertainty in renewable generation can be managed cost-effectively by increasing grid flexibility.** Many grid flexibility options have been deployed, including changing how the power system is scheduled, balancing supply and demand over larger regions, using energy storage and other quick-ramping resources, and employing new operating reserve approaches.
2. **Demand for electricity during all hours of the year can be met through a portfolio approach.** A portfolio approach aggregates variable renewable deployment with dispatchable resources like energy storage, existing and new fossil resources, and new “clean firm” technologies. Studies highlight the benefits of combining solar and storage to meet summer peaks. These studies also demonstrate that significant renewable resource contributions and deep decarbonization can occur as existing (and new) fossil resources transition from sources that provide energy during many hours of the year to resources that operate primarily during periods of low wind or solar output. Systems studies that approach or reach 100% clean energy demonstrate how clean firm technologies can replace existing fossil resources that are acting primarily as capacity resources.
3. **Increased utilization of power electronics supports frequency stability.** Frequency stability studies have demonstrated that grids can maintain reliable operation with greatly increased use of wind and solar. Along with energy storage, wind and solar resources use power electronics that can react very quickly to faults and provide frequency support to the grid—which can offset the decline in inertia.

² While this list covers most of the important issues evaluated in renewable integration and reliability studies, it is not comprehensive. There are other important issues that have been studied and some that require further study. These include voltage control and stability, system strength, transient stability, and fault current. These issues are not discussed further in this report.

4. **Expanded transmission networks are central to increasing reliability.** Capacity expansion and chronological operational studies generally conclude that increased utilization of existing transmission and new transmission expansion are needed to cost-effectively achieve high contributions of wind and solar across the United States. This includes building out local transmission networks to access the best renewable energy resources as well as expanding transmission capacity between balancing areas and interconnections to move power from where it is available to where it is most needed. This also acts to reduce variability of the aggregated supply of renewable resources across various timescales.

These findings have been incorporated into current utility practices, which has led to instantaneous contributions of wind and solar of over 80% in several regions of the United States (Millstein, O'Shaughnessy, and Wiser 2023). Current utility plans now incorporate various approaches to achieving increased economic deployments of wind and solar while maintaining reliability standards.

1.3 How Have We Studied the Evolving Grid?

Dozens of studies have been performed that examine one or more of the three key issues using a variety of tools and approaches, but they have some common elements.³ They generally start with establishing the scenarios to be studied, including the generation mix in some future year. The scenarios can be developed manually or by using a capacity expansion model that identifies the optimal (least-cost) mix of resources that can meet the target grid conditions.⁴

Once the future resource mix and study conditions are established, a variety of tools may be used, depending on the study goal:

- **Variability studies** are used to evaluate how the mix of generation, storage, and transmission resources can respond to variations in supply from wind and solar.⁵ Many of the earliest studies were designed to examine the avoided costs that result from reduced output from fossil-fueled plants. They often focus on the impact of variability on the existing fossil-fueled generation fleet to ensure the system can react quickly enough and provide adequate levels of operating reserves. The studies also often examine the impact on power plant costs as the plants spend more time varying output and more frequently stop and start. Variability studies use a production cost model that simulates the chronological operation of the grid at an hourly (or sub-hourly) resolution and calculates the cost of operating the system.⁶ These studies typically evaluate reliability over a single year using historical weather patterns.
- **Resource adequacy studies** evaluate the probability that there will be unserved energy (power outages) that might result from some combination of insufficient supply of

³ A more detailed description of study methods is provided in Katz and Chernyakhovskiy (2020).

⁴ Capacity expansion models are not unique to renewable studies. They have been used as part of utility planning processes for decades. For additional discussion see Murphy and Weiss (1990) and Cole et al. (2017).

⁵ While production cost models typically do not simulate the more rapid variations in supply in the regulation time frame, they do ensure adequate reserves can respond to more rapid variation.

⁶ These tools use detailed datasets that include individual generator performance and how fast they can vary output.

generation resources or higher-than-average demand.⁷ These studies often include additional consideration of forecasted changes to demand patterns due to energy efficiency and electrification of end uses. The studies perform chronological simulations over at least one year of future grid conditions, examining in detail the potential shortfall of supply and potential mitigation measures during periods of high demand and during periods of lower renewable energy supply, often using the same production cost models as variability studies. However, resource adequacy studies may also use additional tools that consider uncertainty in resources over longer time periods and a broader set of possible weather conditions (or use a single tool that combines both chronological simulations with the probabilistic component).

- **Frequency stability studies** examine the ability of the grid to maintain system frequency within a tolerance. Unlike the previous studies that examine one or more full years, these studies typically only consider a few moments in time, often those where the system may be particularly vulnerable to a fault, such as periods where many thermal generators have been turned off and there is less inertia on the grid. They use a class of tool known as a power flow model to simulate the dynamic operation of the grid immediately following a fault and can identify conditions where frequency stability may be compromised.⁸

It is important to note that most studies are iterative in nature—they often discuss reliability concerns, identify one or more potential solutions, and evaluate the solutions to ensure the reliability target or standard is met. The process of studying the grid has also evolved as lessons from real-world experience have been incorporated and as modeling tools have improved with increased ability to examine variable and inverter-based resources. Historically, most studies have focused on large-scale transmission and generation-based options, but there is increasing recognition of the potential for distributed resources to provide grid services.

1.4 Study Geography

The studies vary across geographical scales, but there are two main types of geographical regions studied: balancing areas and interconnections. In the U.S. power grid, supply and demand are balanced in 66 balancing areas (Figure 1).⁹ Therefore, many studies of variability and resource adequacy focus on individual balancing areas. Many studies also examine the potential benefits of improved coordination across multiple balancing areas, including the potential to import and export energy during periods of high system stress or excess renewable production. Balancing areas are electrically interconnected into one of three large, independent grids known as interconnections: Eastern Interconnection (EI), Western Interconnection (WI), and Electric Reliability Council of Texas (ERCOT).¹⁰

⁷ This is an oversimplified definition of resource adequacy, which includes elements of addressing short-term variability. For additional discussion, see Energy Systems Integration Group (2021).

⁸ These models are often referred to as power flow models because one of their main applications is to understand the flow of power along various transmission lines to ensure the lines are not overloaded.

⁹ The number and size of balancing areas have changed over time.

¹⁰ The EI and WI includes much of Canada and the WI includes a small part of Mexico.

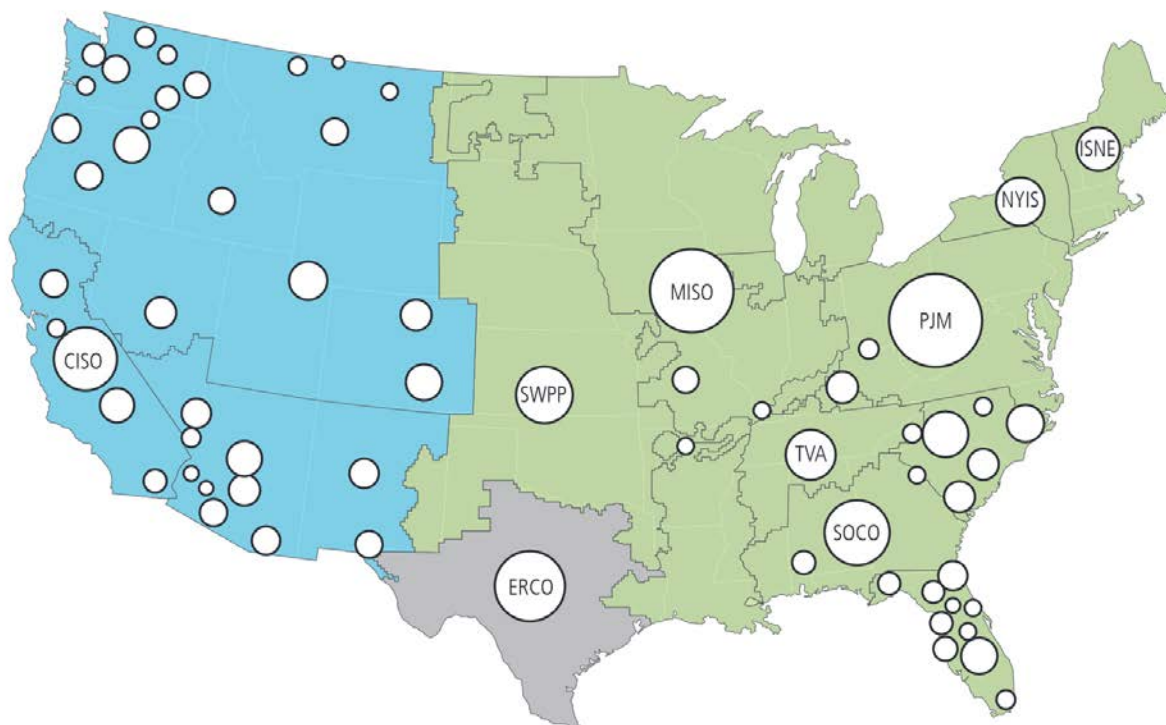


Figure 1. The U.S. power grid consists of 66 balancing areas and three interconnections (U.S. Department of Energy 2017).

1.5 Studies Considered

Table 1 lists variability and resource adequacy studies that examine annual renewable generation contributions of between 30% and 100% in various regions of the United States that we considered in this review. This table is not intended to be comprehensive and only lists studies that include detailed chronological simulations. Table 2 lists studies that focus on frequency stability.

Table 1. Variability and Resource Adequacy Studies

Region	Cite	Renewable Contribution	Study Focus
WI	GE Energy 2010	35%	Variability
WI	Lew et al. 2013	33%	Variability
EI	Bloom et al. 2016	30%	Variability
EI and WI	Bloom et al. 2022	40%	Variability, Resource Adequacy
North America	Brinkman et al. 2021	70%–80% by 2050	Variability, Resource Adequacy
USA	Mai et al. 2012	80% by 2050	Resource Adequacy, Variability
California	Brinkman et al. 2016	56%	Variability
Los Angeles	Cochran et al. 2021	100% by 2035/2045	Variability, Resource Adequacy
New England	Boughan et al. 2022	95% carbon free	Resource Adequacy
Pacific Northwest	Ming et al. 2019a	60%–100% by 2050	Resource Adequacy
California	Ming et al. 2019b	100% by 2045	Resource Adequacy
California	Douglas et al. 2009	33% by 2020	Variability
PJM	GE 2014	30%	Variability
Midcontinent System Operator	Prabhakar et al. 2021	>50%	Variability
Southwest Power Pool	Southwest Power Pool 2016	60%	Variability
PJM	PJM 2021	50%	Variability, Resource Adequacy
New York	NYISO 2022	70%	Resource Adequacy
New England	Mettetal et al. 2020	60% renewable/ 70% clean	Resource Adequacy, Variability

Table 2. Frequency Stability Studies

Region	Year	Max. Instantaneous Inverter-Based Resource Contribution
WI	Miller and Pajic 2018	~60%
WI	Miller et al. 2014	53%
ERCOT	Miller et al. 2008	~20%
EI	Miller et al. 2013	25%
WI	Gevorgian et al. 2015	80%
WI	Tan et al. 2018	80%

2 Meeting the Ramp: Lessons From Variability Studies

Early studies of variability introduced several important concepts in power system planning and operation with increased use of renewable energy. One is the concept of net load, or load minus the contribution of renewables. Net load represents the energy that must be served by the balance of the system fleet. Figure 2 illustrates a large increase in net load in the late afternoon that occurs in a system with significant solar contribution.

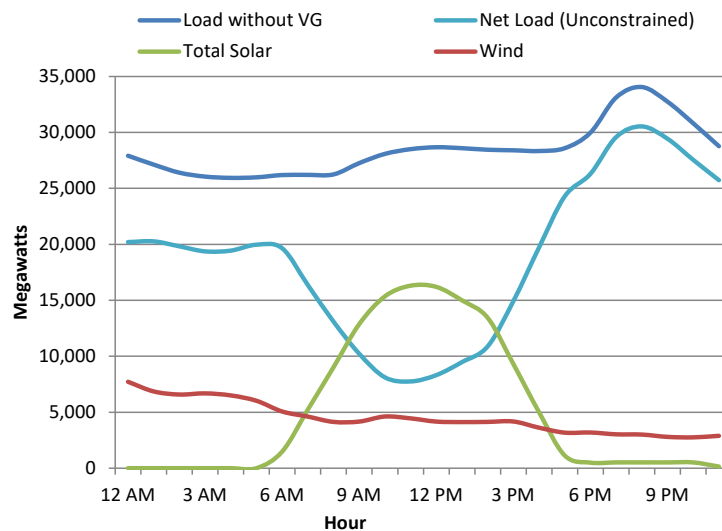


Figure 2. Concept of net load.

VG = variable generation

Another important concept introduced by these early studies is the “flexibility supply curve,” which suggests that a variety of options should be considered for the grid to address the increased ramping requirements along with the uncertainty of renewable supply. Wind and solar can then be deployed at the lowest possible cost. Figure 3 shows an example flexibility supply curve; many of these options have been deployed in the past two decades and have helped achieve the levels of renewable deployment to date, discussed in Section 5.

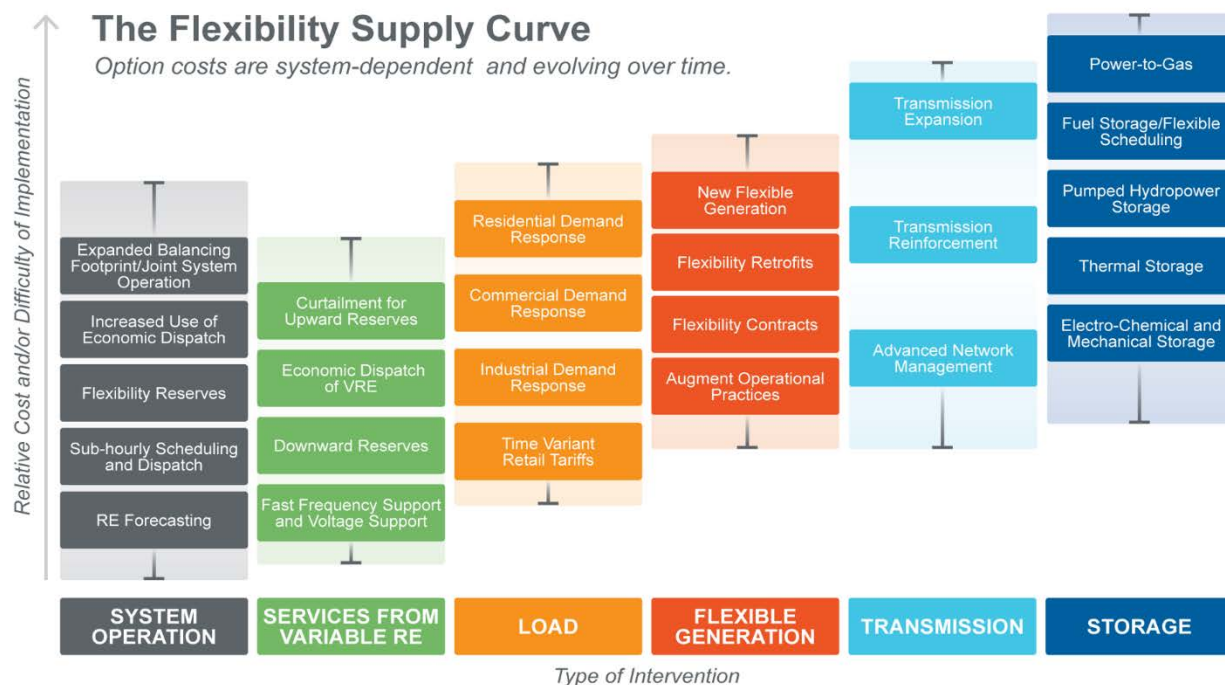


Figure 3. Example of a flexibility supply curve¹¹

As an example, early variability studies identified the role of geographic diversity in reducing the variability of renewable resources. While the output of a single, small solar system can change rapidly due to passing clouds, the aggregated output of many, geographically dispersed systems is much smoother and can be better forecasted (Zhang, Hodge, and Florita 2013). Figure 4 shows an example comparing the variability of the solar resource at a single site vs. multiple sites and shows that variability typically occurs over longer timescales (minutes to hours), which reduces the potential need for expensive operating reserves. A similar benefit of aggregation occurs with wind generators.

By balancing supply and demand over larger regions (via improved balancing area coordination or creating larger balancing areas), the variability of renewables (and also of regional loads and other generation resources) is significantly reduced (Denholm and Cochran 2015). System operation costs have therefore been reduced, and the benefits of renewables in offsetting fossil fuel use have increased. Early assumptions about the need for “1:1 spinning backup” from fossil-fueled resources have largely been refuted, and studies (along with real-world experience) have demonstrated that the costs of increased fossil-fuel plant cycling are small compared to the fuel cost savings from reduced fossil fuel use (Lew et al. 2013).

¹¹ Note that this chart is intended to illustrate the concept of a supply curve; the order of the individual components is not definitive.

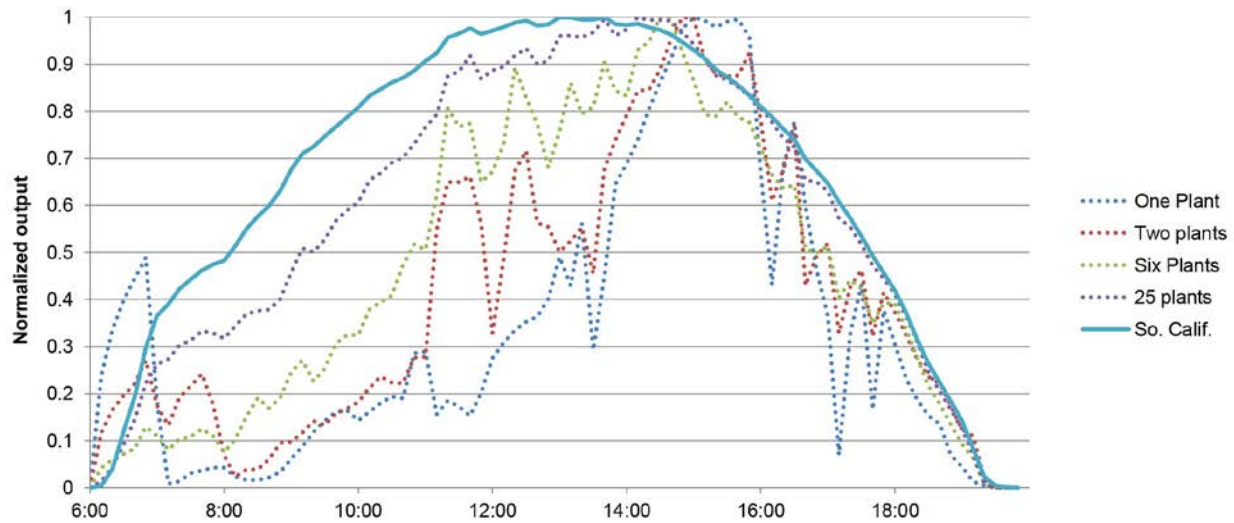


Figure 4. Normalized PV output for increasing aggregation of PV plants in Southern California on a partly cloudy day

Studies have also identified benefits related to improved renewable production forecasting and shorter-term generator scheduling in response to changing conditions. Several regions have introduced flexible ramping reserves specifically to address sub-hourly renewable variability. Flexible ramping reserves provide a lower-cost alternative to addressing solar and wind variability with higher cost regulating reserves, which may have response rates faster than are actually needed (Denholm, Sun, and Mai 2019). Several regions also now allow wind and solar to provide operating reserves, particularly during periods of very high renewable generation when the output of fossil fuel generators is substantially reduced.¹²

As a result of these actions, several regions have met or exceeded the levels of renewable deployment evaluated in the earliest studies, demonstrating the benefits of careful study and planning. Many forward-looking studies examining even greater renewable deployment have identified additional options to address growing variability. These options include greater use of storage and increased use of solar and wind dispatch, where the output of renewable generators is controlled to reduce ramp rates and to provide reserves by operating at partial output in a manner similar to the way in which conventional plants provide reserves.¹³ More coordination across larger geographical areas can provide additional benefits—some studies suggest benefits related to coordinating grid operations across much larger regions, and potentially across the interconnections, through expanded transmission capacity.

¹² This is already common practice in several regions, most notably in Texas (Milligan et al. 2015; Chernyakhovskiy et al. 2019).

¹³ This requires the wind or sun to be available, but if it is not, then variable generation does not add any reserve requirements during that period of time.

3 Meeting the Demand: Lessons From Resource Adequacy Studies

With the growth in wind and solar deployment and the increase in fossil-fueled generator retirements, more recent studies have shifted focus to resource adequacy. These studies are often in the context of regional renewable and climate goals, and many are focused on renewable contributions greater than 50%. The studies all identified pathways to achieve high levels of renewable contributions while maintaining resource adequacy targets, which often aim for an expected loss of load of less than 0.1 days per year (Electric Power Research Institute 2022). The studies identify several important concepts:

1. Resource adequacy is a measure of the system as a whole, considering the total system demand and the combined contribution of all generators and the transmission network.
2. Resource adequacy should be considered at all hours of the year, not just during periods of traditional demand peaks.
3. Fossil resources will increasingly transition from acting as energy resources (that run frequently and serve much of the day-to-day demand for electricity) to acting as capacity resources (that run less frequently, mainly during periods of very high demand or low renewable supply).
4. Approaches to maintain resource adequacy vary depending on the level of renewable contribution, decarbonization targets, and how far in the future the study examines.

In most regions, wind and solar are being added to a much larger system, where existing hydropower and thermal plants provide the majority of capacity needed to maintain resource adequacy. As a result, ensuring resource adequacy in the near term means incremental additions are needed to replace retiring capacity or to address load growth. In addition to traditional generation resources, other options to provide resource adequacy include transmission, storage, and demand-side resources.

New approaches must be considered when evaluating the potential resource adequacy contributions of renewable resources. For example, combinations of wind, solar, and storage can contribute to resource adequacy, but unlike thermal and hydropower resources, these contributions depend on the amount of the resources already installed. For example, Figure 5 shows the peak summer load in Texas during two days in 2022, and the impact on net peak load after the contribution of solar energy on this day. In this example, there is a substantial reduction in net demand, reducing the need for fossil-fueled resources to maintain resource adequacy during the summer peak. However, the net load has been shifted to the early evening when solar output has fallen, and doubling the amount of solar (shown by the orange line) would provide no further reduction in net load. This is a significant limiting factor for solar to (by itself) provide resource adequacy in grids with even greater deployment of renewables. At the same time, the change in net load shape also makes it easier for storage to meet the remaining (shorter) summer peaks, demonstrating considerable synergy between the two technologies.

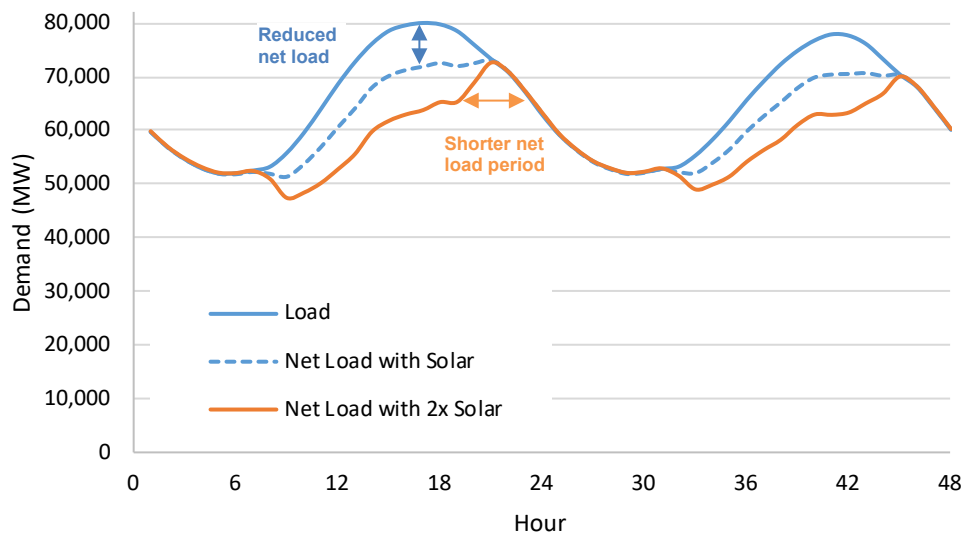


Figure 5. Example of the impact of solar on net load in ERCOT on July 20–21, 2022. The solar already installed has reduced the net load, providing resource adequacy benefits. Additional solar has limited ability to reduced net load but shortens the length of the net load peak, making it easier for shorter-duration energy storage (or demand response) to provide additional resource adequacy benefits.

The role of fossil-fueled resources in high renewable studies varies considerably, depending largely on renewable energy and decarbonization targets. For example, the results from one nationwide grid study in Figure 6 show the energy contribution (top) and contribution toward resource adequacy (bottom) provided by different resources under increasing levels of annual renewable contribution ranging from 57% to 100% (Cole et al. 2021). In many cases, keeping existing (or even building new) fossil-fueled resources is often identified as the least-cost approach to maintaining resource adequacy while transitioning to greater levels of decarbonization. For example, in the case of achieving 57% contribution from renewables, fossil-fueled generation provides about 30% of annual electricity generation (energy) but about 60% of firm capacity. Thus, as the contribution from renewables increases, fossil-fueled generators transition to act primarily as a source of capacity.

There is considerable interest in clean firm technologies that can meet demand during extended periods of lower wind and solar output such as seasonal storage.¹⁴ However, studies have demonstrated that annual contributions of 80% can be achieved without significant deployments of new clean firm technologies by deploying a mix of renewable energy, storage, and potentially significant amounts of existing (or new) fossil-fueled generators. The fossil-fueled generators are maintained in the system primarily to provide resource adequacy (not energy); because they operate infrequently, they produce relatively few emissions. The study shown in Figure 6 does not deploy clean firm technology until annual renewable contribution exceeds 90%, (in part due to the assumption of nationwide coordination of the power grid and large-scale deployment of interregional transmission). This emphasizes the potential to get very deep decarbonization while

¹⁴ While no technology is truly “firm” (having 100% capacity credit), the term clean firm refers to technologies that are both low emission and have high capacity credit.

maintaining a large amount of fossil-fueled capacity used only during periods of extremely high demand or low wind and solar.

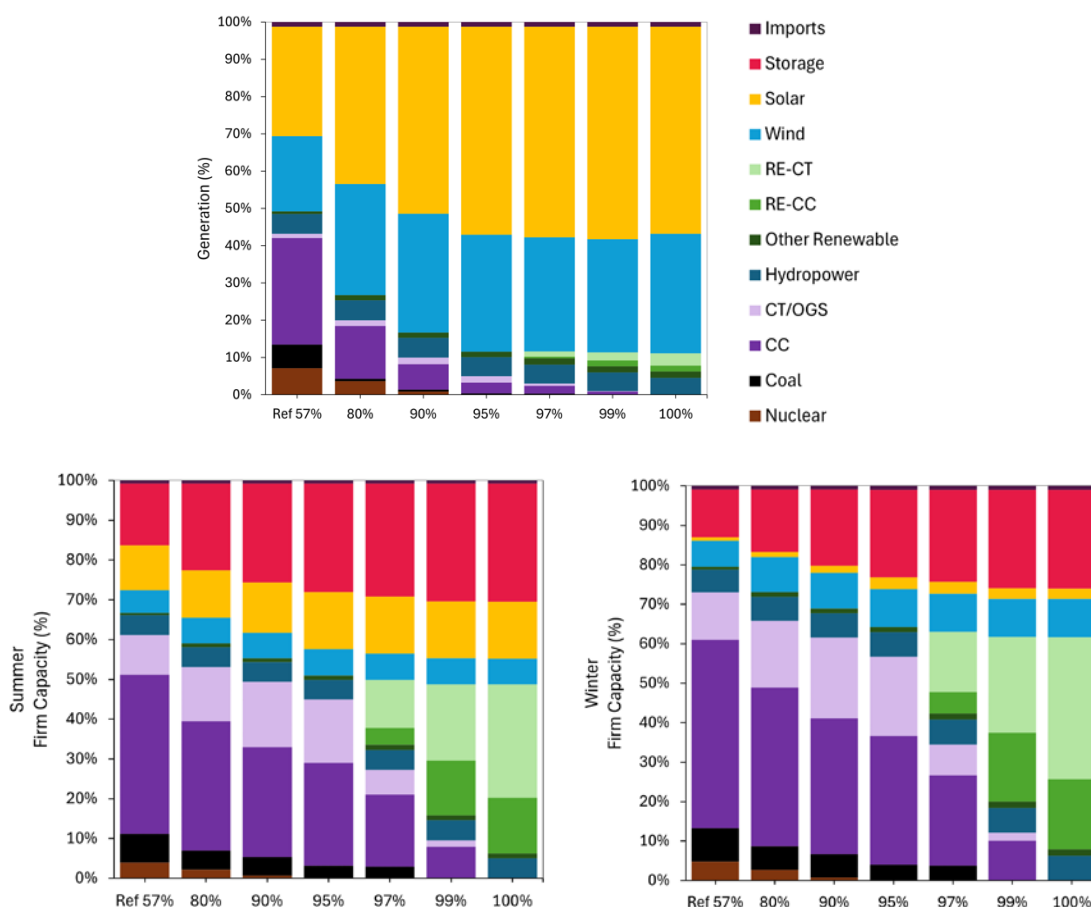


Figure 6. Example of an energy mix (top) and firm capacity (bottom) from one study of the evolution to 100% clean energy, where fossil fuels continue to provide a large amount of capacity but with a decreasing amount of energy (Cole et al. 2021).

There is considerable uncertainty about which technologies might be the most cost-effective to provide the mix of capacity that will likely be required in 100% clean energy systems. They would be required to provide reliable capacity during multiday periods in all seasons. Many of the proposed technologies envisioned in 100% clean energy scenarios (including carbon capture, hydrogen, or next-generation nuclear) have yet to be deployed at scale. Many of these technologies, particularly hydrogen, will require significant changes to infrastructure and are associated with changes to the entire energy system beyond the electricity grid.

4 Keeping the Grid Moving: Lessons From Frequency Stability Studies

4.1 Frequency Stability – Summary of the Issue and Study Approach

Studies to date provide a strong indication that frequency stability can be maintained with understood technologies, including some technologies that have already been deployed at scale. The current grid relies largely on generators that spin at a nearly constant frequency. In the moments following a sudden loss of supply, such as a transmission line outage or generator failure, the supply/demand imbalance can result in a decline in frequency as the system slows down. But some of the inherent stored energy in existing generators (inertia) is injected into the grid automatically after a fault, which keeps the system from slowing down too fast and gives the system time to detect and respond to the loss of supply (Denholm et al. 2020).

Inertia is part of the more general category of “frequency response,” which consists of several processes that detect and respond to changes in frequency and prevent frequency from dropping below a minimum level at which the system must initiate controlled blackouts to prevent damage to equipment. Frequency response has historically been provided by synchronous generators in thermal (fossil fuel and nuclear) and hydropower plants.

Wind, solar, and battery storage use power electronics (inverters) to provide grid-compatible electricity and do not behave the same way as synchronous generators. These inverter-based resources (IBRs) do not automatically provide frequency response in the seconds and minutes following a grid event or disturbance. As a result, replacing conventional generation with IBRs can reduce traditional frequency response, including real inertia, and can decrease the stability of the power system if no mitigating actions are taken. This means there is a need to study the impact of IBRs and develop methods to increase their use without compromising frequency stability.

4.2 Study Findings

There are several consistent themes among frequency stability studies to date. They all demonstrate that as IBRs are added, their contribution can lead to synchronous generators being turned off during very windy or sunny periods. This leads to a reduction in physical inertia and inherent frequency response.

Multiple solutions have been identified in these studies to mitigate the decline in physical inertia and maintain sufficient frequency response. The main approach studied is the use of fast frequency response (FFR), which exploits the ability of electronic devices to respond very rapidly to changes in frequency. Fast frequency response is obtained from multiple sources, including flexible loads that are paid to disconnect for very short periods of time or IBRs that can rapidly increase output. Energy storage, wind, and solar can reduce output during periods when there is available energy from wind and solar resources and then rapidly increase output in response to a fault. All of these devices can respond faster than conventional generators; this rapid response significantly decreases the amount of physical inertia required.

The amount of mitigation required depends significantly on the size of the grid, the amount of IBRs deployed, and the makeup of the remaining generation fleet. The need is smallest in large grids that have a large contribution of low-carbon resources that use synchronous generators, including hydropower, nuclear, biomass, and geothermal. Even with significant deployment of IBRs, studies of the EI (serving about 70% of the nation’s electricity demand), show that this grid can support extremely large amounts of renewable resources with small impact on frequency stability. The WI is smaller, but also has significant clean synchronous generation, and the need for FFR is relatively small, even with large contribution from IBRs (Denholm et al. 2020). Figure 7 shows an example during a period when IBRs are providing 60% of the WI’s entire generation (Gevorgian, Zhang, and Ela 2015). This chart shows the frequency after the worst-case fault the system is expected to address. In cases where no FFR is deployed, the frequency falls below 59.5 Hz, where load shedding must occur. But the addition of FFR from wind avoids this large drop in frequency and maintains stable operation during a worst-case scenario.

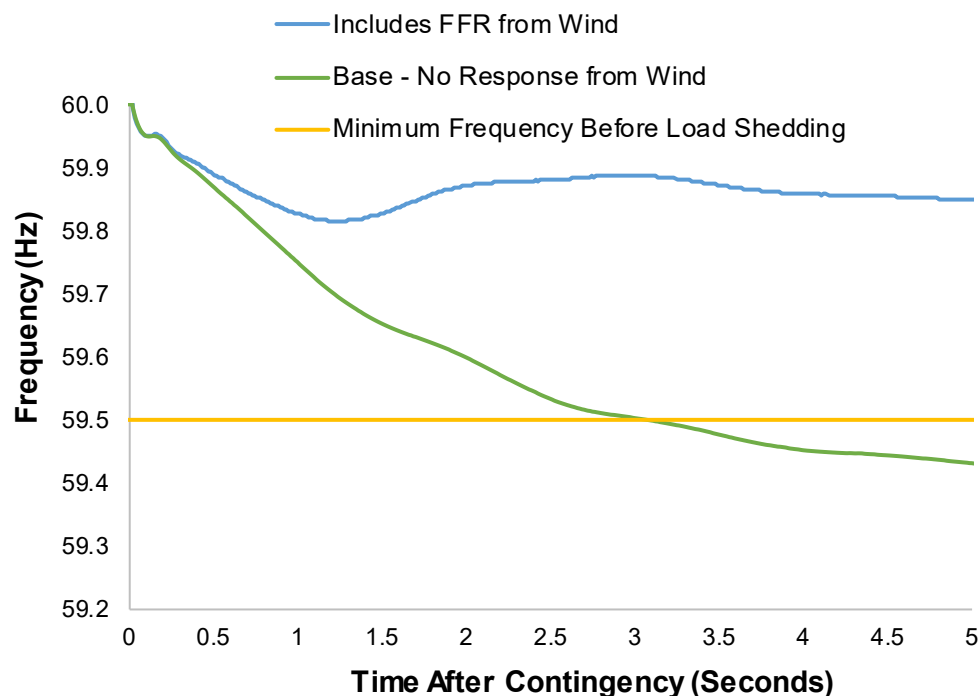


Figure 7. Example of a study demonstrating the benefit of fast frequency response from wind in a grid with decreased inertia (Gevorgian, Zhang, and Ela 2015).

The need to address the decline in inertia is greatest in the smallest of the three grids (ERCOT), which does not have significant hydropower, geothermal, or biomass combustion.¹⁵ ERCOT has already made changes to system operation, including using FFR, largely from loads. ERCOT has also required IBRs to provide frequency response services.

¹⁵ Additionally, ERCOT has a contingency size that is about the same as that of the WI, which increases the need for frequency response.

IBRs are increasingly required by state and federal standards to provide grid services such as frequency response (FERC 2018). In addition to FFR, there are additional well-proven approaches that maintain physical inertia such as using clean energy resources that use synchronous renewable generators, or stand-alone devices that provide physical inertia without requiring a generator (synchronous condensers).

Finally, it is possible to operate grids without large amounts of physical inertia by using grid-forming inverters.¹⁶ These devices have been deployed in smaller grids, but there have been limited studies of the potential use of these devices at the interconnection level, which is required to study system frequency stability.

Overall, multiple studies indicate that the use of measures such as FFR can mitigate the loss of synchronous generation due to the variable generation that will likely be deployed in the coming decade, especially in the larger EI and WI grids that serve more than 90% of the country. The biggest outstanding question is which combination of solutions might achieve the lowest cost.¹⁷

¹⁶ While current inverters (known as grid-following inverters) can provide frequency response, they cannot inherently and independently create the alternating current waveform the grid uses as a reference. This is one of the main distinctions between these and grid-forming inverters, which create the waveform.

¹⁷ There are a number of other reliability issues related to large-scale IBR deployment beyond frequency that are not discussed here. Many are discussed by NERC (2023).

5 From Study to Practice: Where Are We Now and Where Are We Going?

While the U.S. power grid is well below 100% variable renewable energy on average, several regions in the country (and many around the world) have achieved very high contributions from renewable energy over shorter timescales. Figure 8 illustrates the average and maximum hourly contribution from wind and solar resources for several regions in 2023. The data in Figure 8 do not include the contribution of rooftop or other behind-the-meter (BTM) solar or other renewable or clean electricity resources; however, they demonstrate the ability of the system to remain reliable while addressing both variable supply and (in the case of ERCOT) high levels of IBR contributions.

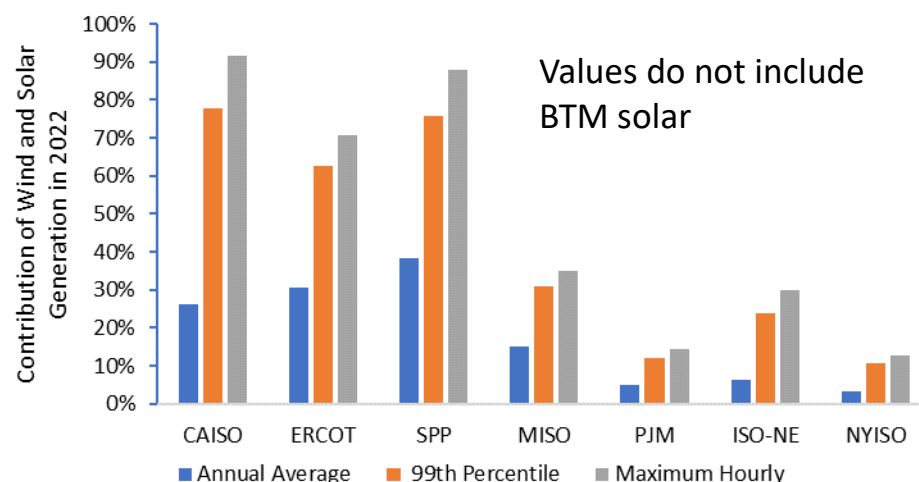


Figure 8. Average and maximum hourly contribution of wind and solar resources in 2023¹⁸

5.1 Incorporating High Levels of Variable Generation in Utility Planning

The lessons learned from studies and real-world experience is now being incorporated into utility planning for future growth in renewable energy. With wind and solar providing the lowest-cost source of new electricity, and with storage providing cost-effective peaking capacity, many utility resource plans include significant deployment of these technologies. Utility plans account for the low cost of energy from wind and solar, the limits of wind and solar to provide energy during peak periods, and the need to address the variability and uncertainty of these resources—it is well understood that 1 MW of variable generation capacity does not generally provide the same resource adequacy value as 1 MW of retiring fossil-fueled capacity.

¹⁸ Data provided by Dev Millstein, available at <https://emp.lbl.gov/renewables-and-wholesale-electricity-prices-rewep>. It should be noted that all regions except ERCOT are interconnected to other grids which mitigates some of the challenges, and there are often other generation resources in these regions that are operating and exporting energy.

Recent resource plans filed to regulatory agencies reflect the expectations that wind and solar can be part of the least-cost mix of resources while maintaining reliable electricity. These plans indicate corporate intentions to deploy the proposed generation capacity and the proposed mix of resources to meet reliability standards required by state and regional regulatory agencies. Table 3 lists five filed resource plans that achieve significant contribution of renewable energy while explicitly stating that the systems are expected to maintain reliability standards.

Table 3. Utility Resource Plans Demonstrating the Mainstream Nature of High Renewable Energy Contribution in Plans That Include Reliability Standards

Utility and Integrated Resource Plan Year (including link to study)	% Renewable Energy	Notable Reliability-Related Findings
Southern California Edison (2022)	90% by 2035, 95% by 2040	“Portfolio passes both the 1-in-10 LOLE reliability assessment and the feasibility and operability (emissions) check in PCM” ^a
Puget Sound Energy (2023)	85% by 2030, 100% by 2045	Scenarios satisfy PRM and include additional capacity for 5% LOLP ^a
Appalachian Power Company (2022)	53% by 2036, 100% by 2050	Scenarios achieve “reliability/reserve margin requirements as set forth by PJM”
Public Service Co of Colorado (2022)	83% by 2028	The plan “meets resource adequacy needs”
Indiana Michigan Power (2021)	~50%–55% by 2041	“The Preferred Portfolio includes additions that when added to the Company’s current resources, ... ensure the reliable supply of electricity while also maintaining PJM capacity requirements and supporting resource adequacy.”

^a LOLE = loss of load expectation; PCM = production cost model; LOLP = loss of load probability

6 Conclusions

Over the past two decades, dozens of studies have been conducted to evaluate questions associated with maintaining reliability in power systems with an increased deployment of variable renewable energy (wind and solar). These studies have identified approaches to cost-effectively address the variability and uncertainty of solar and wind resources. Many of these approaches have been implemented, enabling a growing contribution of variable renewable energy resources in today's grid. These studies also identify pathways to accommodate future growth, including addressing the changing role of traditional generators from energy resources to capacity resources. Studies have also identified how new technologies can help maintain grid stability. These lessons can support current utility plans to develop large amounts of economic renewable energy deployments while maintaining state and federal reliability standards.

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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-174
2021 NREL North American Renewable Integration Study

The North American Renewable Integration Study: A U.S. Perspective



Gregory Brinkman,¹ Dominique Bain,¹ Grant Buster,¹ Caroline Draxl,¹ Paritosh Das,¹ Jonathan Ho,¹ Eduardo Ibanez,² Ryan Jones,³ Sam Koebrich,¹ Sinnott Murphy,¹ Vinayak Narwade,¹ Joshua Novacheck,¹ Avi Purkayastha,¹ Michael Rossol,¹ Ben Sigrin,¹ Gord Stephen,¹ and Jiazi Zhang¹

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The North American Renewable Integration Study:

A U.S. Perspective

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Preface

This report is one of four reports published as part of the North American Renewable Integration Study, or NARIS:

- *The North American Renewable Integration Study: A U.S. Perspective* (this report)
- *The North American Renewable Integration Study: A U.S. Perspective—Executive Summary*
- *The North American Renewable Integration Study: A Canadian Perspective*
- *The North American Renewable Integration Study: A Canadian Perspective—Executive Summary*

For more information about NARIS, see www.nrel.gov/analysis/naris.html.

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Members of the NARIS Technical Review Committee—which included experts representing approximately 50 utilities, grid system operators, and industry organizations throughout North America—helped guide the study assumptions, data, and methodologies to address relevant questions. Although the committee members helped review the report, it might not reflect the specific views or interpretations of any member of the committee or their institution. We would like to thank everyone who attended committee meetings (in person and virtual) or provided guidance during the study process, including those who provided specific comments on this report.

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List of Acronyms and Abbreviations

AB	Alberta
AEO	Annual Energy Outlook
ATB	Annual Technology Baseline
BAU	business as usual
BC	British Columbia
CAISO	California Independent System Operator
CAMX	California and Mexico
dGen	Distributed Generation Market Demand
DPV	distributed photovoltaics
ECMWF	European Centre for Medium-Range Weather Forecasts
EIA	Energy Information Administration (United States)
ERCOT	Electricity Reliability Council of Texas
EUE	expected unserved energy
FRCC	Florida Reliability Coordinating Council
HQ	Hydro Quebec
HVDC	high-voltage direct current
IESO	Independent Electricity System Operator
ISO	independent system operator
LCOE	levelized cost of electricity
LOLE	loss-of-load expectation
LOLH	loss-of-load hours
LTRA	Long-Term Reliability Assessment
MAE	mean absolute error
MH	Manitoba Hydro
MISO	Midcontinent Independent System Operator
MWh	megawatt-hours
NARIS	North American Renewable Integration Study
NEB	National Energy Board (Canada)
NEM	net energy metering
NERC	North American Electric Reliability Corporation
NREL	National Renewable Energy Laboratory
NWPP	Northwest Power Pool
NYISO	New York Independent System Operator
PCM	production cost model
PRAS	Probabilistic Resource Adequacy Suite
PRODESEN	Programa de Desarrollo del Sistema Eléctrico Nacional
PV	photovoltaics
ReEDS	Regional Energy Deployment System Model
reV	Renewable Energy Potential Model
RMRG	Rocky Mountain Reserve Group
RTO	regional transmission organization
SENER	Secretaría de Energía de México
SPP	Southwest Power Pool
SRSG	Southwest Reserve Sharing Group
TEPPC	Transmission Expansion Planning Policy Committee

TWh	terawatt-hours
TW-mi	terawatt-miles
USD	U.S. dollars
VG	variable generation
WECC	Western Electricity Coordinating Council
WIND	Wind Integration National Dataset
WRF	Weather Research and Forecasting

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1 Introduction

The North American Renewable Integration Study (NARIS) is the first detailed power system integration study for the entire North American continent. NARIS aims to inform grid planners, operators, policymakers, and other stakeholders about the potential opportunities for system integration of large amounts of wind, solar, and hydropower to create a low-carbon grid in the future. The NARIS project began in 2016. This report describes a U.S. perspective in coordination with the U.S. Department of Energy, and a companion report describes a Canadian perspective in coordination with Natural Resources Canada.

The North American electric power grids are evolving toward higher contributions of variable generation (VG) resources (i.e., wind and solar) for several reasons, including lower costs and lower emissions. NARIS analyzes the entire North American continent, which is composed of five asynchronous interconnections that overlap the three countries. The analysis and conclusions of the study can help guide stakeholders to understand how the components of the power system can help work together to create a reliable, cost-effective, low-carbon grid in North America. This includes understanding the benefits of different technologies and operating practices to the future system.

The key analysis goals of NARIS were to evaluate a set of possible pathways for North American grid evolution through 2050 and to leverage production cost and Monte Carlo modeling tools to understand key questions about grid flexibility and resource adequacy.

NARIS extends and complements grid integration studies from the past, including the Pan Canadian Wind Integration Study (GE Energy Consulting 2016), Western Wind and Solar Integration Study (GE Energy 2010), and Eastern Renewable Generation Integration Study (Bloom et al. 2016). However, there are a few key differences between NARIS and most of these large, stakeholder-driven studies:

- NARIS studies all the grid-connected portions of Canada, the United States, and Mexico and applies consistent methods and data throughout. This includes the Eastern Interconnection, the Western Interconnection, the Texas Interconnection, the Quebec Interconnection, and the Sistema Eléctrico Nacional (Mexico).
- Partly because of its longer study horizon, NARIS studies higher deployment of renewable generation, especially VG resources such as wind and solar photovoltaics, throughout North America.
- NARIS optimizes the entire generation fleet and transmission infrastructure evolution through 2050, which makes each scenario specifically designed to key assumptions (Section 1.2). Many previous integration studies started with a planned system and added wind and solar to that system, without additional retirements or changes to the rest of the generating fleet.

Some of the key accomplishments of NARIS include:

- Analysis
 - Performed the most comprehensive long-term analysis of power system evolution to date on the North American grid using models and data sets described in Section 2
 - Analyzed the feasibility and adequacy of high-renewable scenarios
 - Analyzed the value of technologies, including transmission, hydropower flexibility, and storage in the future power system
- Tools and Methods
 - Created continental capacity expansion planning tool (Regional Energy Deployment System Model, or ReEDS) based on expansion of the existing U.S. tool. The ReEDS model and data for the United States is open-sourced, with extensibility for Canada and Mexico pending public data. Aggregated results from the ReEDS modeling in NARIS are available on the NARIS website.¹
 - Created open-sourced the Probabilistic Resource Adequacy Suite (PRAS)² modeling framework to assess multiregional system reliability metrics.
 - Improved methods for representing resource adequacy in capacity expansion models to produce reliable scenarios. This method has been open-sourced as part of ReEDS.
 - Created open-sourced, consistent, continent-wide wind resource data with 5-minute time resolution representing 2007–2014 (expanding the existing U.S. data set for wind). Solar 5-minute data were downscaled from existing the 30-minute National Solar Radiation Database data set.³
 - Created 5-minute resolution data sets for wind power, solar power, and load for a variety of scenarios
 - Created the open-source Renewable Energy Potential Model (reV)⁴ model for geospatial analysis and data preparation for consistent use between modeling platforms.
 - Created dGen (Distributed Generation Market Demand)⁵ distributed photovoltaics (DPV) adoption models for Canada and Mexico by extending the existing U.S.

¹ “North American Renewable Integration Study,” NREL, <https://www.nrel.gov/analysis/naris.html>.

² “Probabilistic Resource Adequacy Suite,” GitHub, <https://github.com/NREL/PRAS>.

³ Data are available at “NREL Wind Integration National Dataset,” Amazon Web Services, <https://registry.opendata.aws/nrel-pds-wtk/>. Usage examples are available at “NREL Highly Scalable Data Service (HSDS) Examples,” GitHub, <https://github.com/nrel/hsds-examples>. Solar data are available at “NSRDB: National Solar Radiation Database,” NREL, <https://nsrdb.nrel.gov/>.

⁴ “reV: The Renewable Energy Potential Model,” NREL, <https://www.nrel.gov/gis/renewable-energy-potential.html>.

⁵ “Distributed Generation Market Demand,” NREL, <https://www.nrel.gov/analysis/dgen/>.

model, with as much data consistency with the U.S. model as the data sources allow

- Refined hydropower flexibility assumptions in the models, enabling sensitivities to understand the value of flexibility.

The primary technologies considered in NARIS were wind, solar PV, and hydropower, with a focus on the flexibility benefits of existing hydropower. Transmission and storage were examined with a variety of modeling runs. Other renewable generation technologies that might contribute to the system in 2050 but were not a key focus in the study include concentrating solar power, geothermal, and biomass; for these resources (and also nuclear generation), existing assumptions in the models and data sets were used (for costs and performance of new and existing assets), but no additional scenario analysis was done to understand the potential pathways for these resources.

The methods and analysis for this study were guided by the NARIS Technical Review Committee, which helped ensure the methods and data were rigorous, and that we were addressing important questions.

1.1 Motivation

North America has abundant and diverse energy resources, including renewable resources. For example, Figure 1 (page 4) shows wind and solar resource, and Figure 2 (page 5) shows hydropower installations and transmission infrastructure. However, with significant growth in wind and solar generation in the past decade, the grid is becoming more meteorologically dependent than ever before. NARIS endeavors to examine the challenges and opportunities associated with this increased dependence.

Existing and new generation technologies like reservoir, run-of-river, and pumped-storage hydropower; battery storage; and thermal generation all play a role in the future grid. NARIS' findings, like those of much previous work, verify that transmission infrastructure with coordinated operation can help North America take advantage of the diversity of resources to produce affordable and reliable energy. NARIS aims to analyze some of the ways these technologies can work together in a variety of future scenarios.

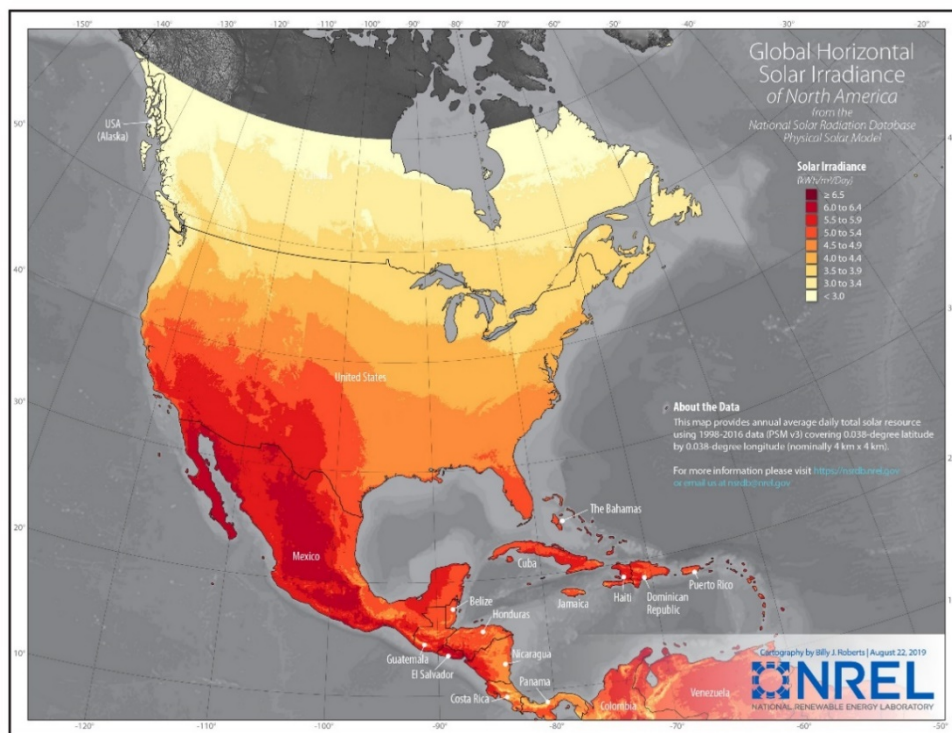
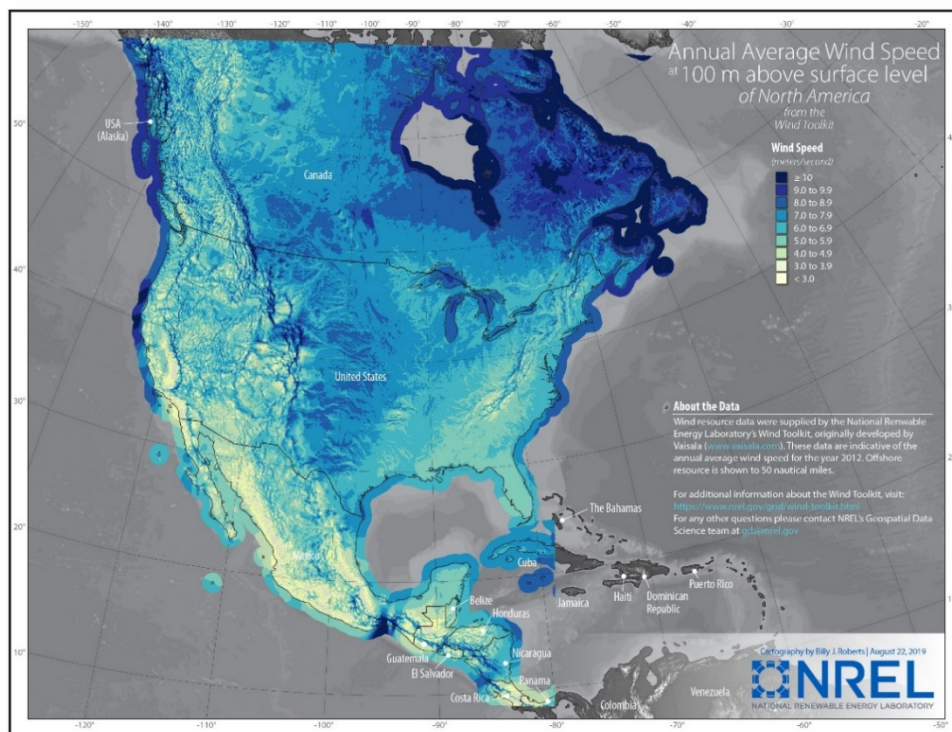


Figure 1. North American wind (top) and solar (bottom) resource

North America has some of the best wind and solar resource in the world, and all regions have excellent wind or solar resources nearby. Many regions have good resource for both wind and solar. These maps show the resource potential; siting and other constraints will limit deployment in some areas, and other inputs like temperature and air density will impact the translation of the resource to power.

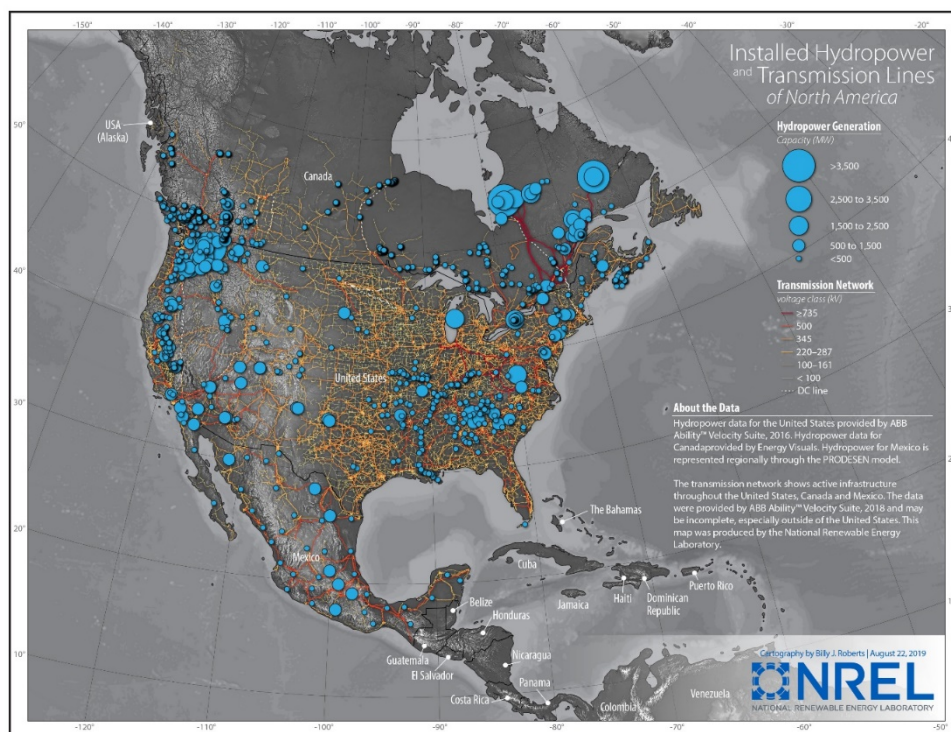


Figure 2. Installed hydropower and transmission lines of North America

North America has hydropower resource concentrated in several regions throughout the continent. It is evident that many high-voltage transmission lines have been built to connect hydropower with load centers (e.g., the West Coast and East Coast). Transmission helps enable geographic diversity among all generating resources and load, and hydropower generation can also contribute to the flexibility. Although the NARIS scenarios do not model extensive hydropower expansion, the value provided by hydropower is examined in Section 3.4

1.2 Scenario Overview

The NARIS scenarios were designed to examine a range of future possible grid evolution; many of them share assumptions with the annual National Renewable Energy Laboratory (NREL) Standard Scenarios⁶ work. The four “core scenarios” shown in Table 1 indicate four potential pathways of North American grid evolution through 2050. Figure 3 shows the key assumptions for the core scenarios; detailed assumptions are available in Section 2.

Table 1. Key Assumptions in the NARIS Core Scenarios through 2050

Scenario	Key Assumptions
Business as Usual (BAU)	The North American grid continues to evolve with expected trajectories for all technology costs, and there are no major changes to carbon legislation across the continent. The scenario includes only state-based requirements as of October 2018 in the United States.
Low-Cost Variable Generation (Low-Cost VG)	VG, including wind and solar, follows a low-cost trajectory based on NREL’s 2018 Annual Technology Baseline (ATB). ^b Otherwise, the scenario is the same as the BAU scenario.

⁶ “Standard Scenarios,” NREL, <https://www.nrel.gov/analysis/standard-scenarios.html>.

Scenario	Key Assumptions
Carbon Constrained (CO ₂ Constrained)	Carbon emissions from the electricity sector are reduced throughout North America, including an 80% reduction from 2005 levels in the United States and Mexico and a 92% reduction in Canada, also from 2005 levels. ^a Otherwise, the scenario is the same as the BAU scenario.
Electrification	New end-use energy demands, including heating and transportation are electrified. And 2050 loads are nearly double the 2020 loads. Otherwise, the scenario is the same as Carbon Constrained scenario.

^a The starting points for the carbon assumptions, especially in the Carbon Constrained scenarios, were the Paris Agreement Mid-Century Strategy documents in all three countries (Government of Canada 2016; SEMARNAT-INECC 2016; White House 2016), with the BAU being based on legislation in Canada

^b "Annual Technology Baseline: 2018 ATB," NREL, <https://atb.nrel.gov/electricity/2018/>.

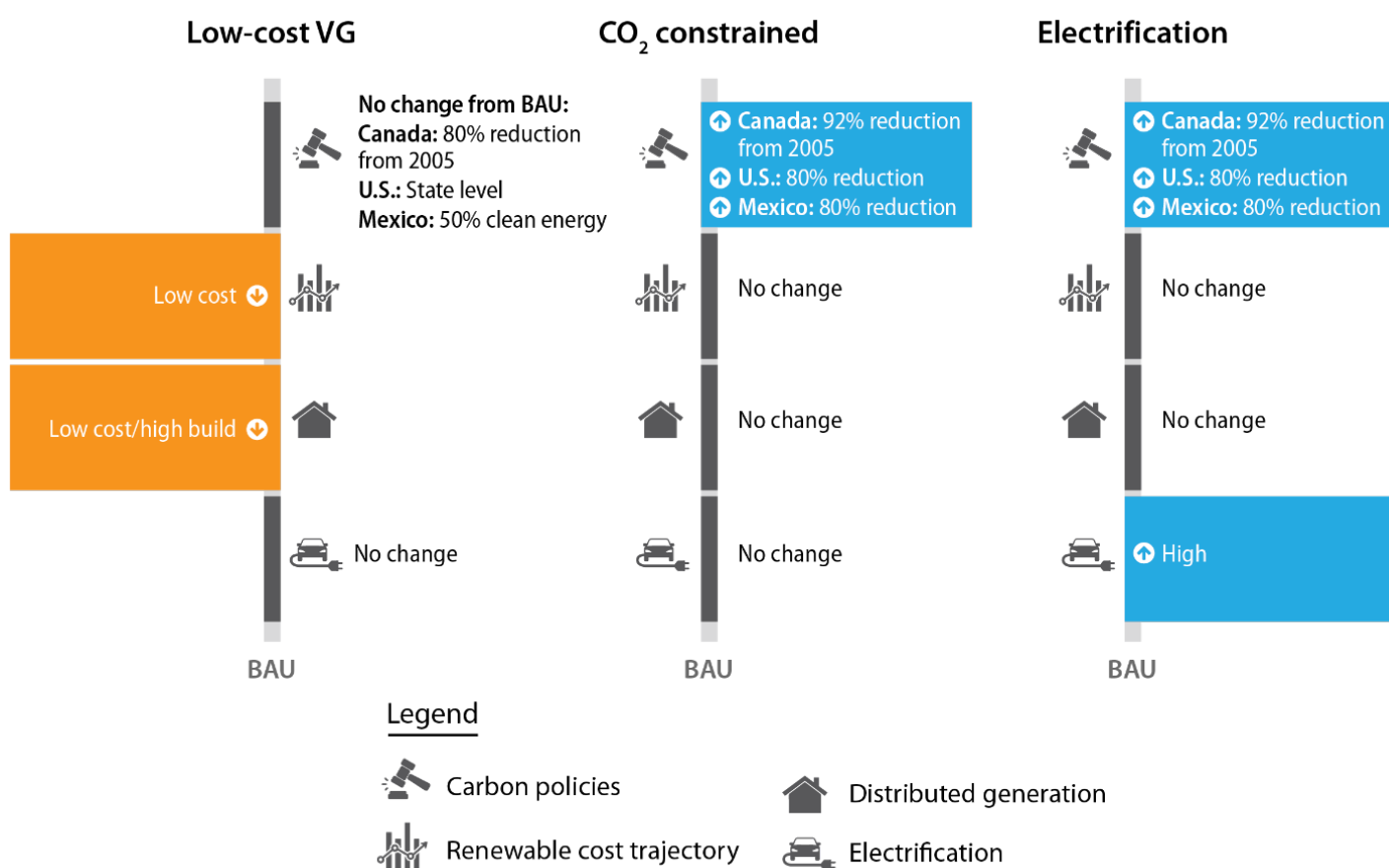


Figure 3. Comparison of core scenarios in NARIS

All changes noted above are in comparison with the BAU.

We also studied a variety of sensitivities to these core scenarios, typically by varying one assumption at a time. These changes include gas prices, transmission build assumptions, storage costs, and other variables. Each sensitivity describes the entire evolution of the grid through 2050 and is referred to as a “scenario” throughout the report. This report focuses primarily on the core scenarios, especially the BAU and Low-Cost VG. The sensitivities help us understand uncertainty and help us quantify the impacts of key assumptions or technologies. Where the additional scenarios are important for conclusions, they are described and presented in the appropriate section. Detailed results for all scenarios are available on the NARIS website.⁷

⁷ “North American Renewable Integration Study,” NREL, <https://www.nrel.gov/analysis/naris.html>.

Table 2. Key Assumptions in All Scenarios through 2050^a

Scenario (+ Sensitivity Tag)	Canada Carbon Policy ^b	U.S. Carbon Policy ^b	Mexico Carbon Policy ^b	Cost Trajectories	Transmission ^c	Retirements ^d	Electrification ^e	Gas Price
Business as Usual (BAU)	80% Reduction	State-Level	50% clean	BAU	Coordinated	BAU	BAU	BAU
BAU Early Retire	—	—	—	—	—	Early	—	—
BAU High Cost Gas	—	—	—	—	—	—	—	High
BAU Low Cost Gas	—	—	—	—	—	—	—	Low
BAU Low Cost Storage	—	—	—	Low-cost storage	—	—	—	—
BAU Macro Grid	—	—	—	—	+ Macrogrid	—	—	—
BAU No Cross-Border Expansion	—	—	—	—	+ No new cross- border lines allowed	—	—	—
BAU No Cross-Border Expansion Uncoordinated	—	—	—	—	Uncoordinated, no new cross- border lines	—	—	—
BAU Uncoordinated	—	—	—	—	Uncoordinated	—	—	—
Low-Cost Variable Generation (VG)	80% Reduction	State-Level	50% Clean Energy	Low-Cost RE	Coordinated	BAU	BAU	BAU
Low Cost VG Early Retire	—	—	—	—	—	Early	—	—
Low Cost VG High Cost Gas	—	—	—	—	—	—	—	High
Low Cost VG Low Cost Gas	—	—	—	—	—	—	—	Low
Low Cost VG and Storage	—	—	—	Low-cost storage + VG	—	—	—	—
Low Cost VG Macro Grid	—	—	—	—	+ Macrogrid	—	—	—
Low Cost VG No Cross-Border Expansion	—	—	—	—	+ No new cross- border lines allowed	—	—	—
Low Cost VG No Cross-Border Expansion Uncoordinated	—	—	—	—	Uncoordinated, no new cross- border lines	—	—	—
Low Cost VG Uncoordinated	—	—	—	—	Uncoordinated	—	—	—
Carbon Constrained	92% Reduction	80% Reduction	80% Reduction	BAU	Coordinated	BAU	BAU	BAU
CO2 Constrained Early Retire	—	—	—	—	—	Early	—	—
CO2 Constrained High Cost Gas	—	—	—	—	—	—	—	High
CO2 Constrained Low Cost Gas	—	—	—	—	—	—	—	Low
CO2 Constrained Low Cost Storage	—	—	—	Low-cost storage	—	—	—	—
CO2 Constrained Macro Grid	—	—	—	—	+ Macrogrid	—	—	—
CO2 Constrained No Cross- Border Expansion	—	—	—	—	+ No new cross- border lines allowed	—	—	—
CO2 Constrained No Cross- Border Expansion Uncoordinated	—	—	—	—	Uncoordinated, no new cross- border lines	—	—	—
CO2 Constrained Uncoordinated	—	—	—	—	Uncoordinated	—	—	—
CO2 Constrained Low Cost VG	—	—	—	Low-cost VG	—	—	—	—
CO2 Constrained Low Cost VG High Gas	—	—	—	Low-cost VG	—	—	—	High
CO2 Constrained Low Cost VG and Low Cost Storage	—	—	—	Low-cost VG and storage	—	—	—	—
Electrification	92% Reduction	80% Reduction	80% Reduction	BAU	Coordinated	BAU	High	BAU
Electrification Early Retire	—	—	—	—	—	Early	—	—
Electrification High Cost Gas	—	—	—	—	—	—	—	High
Electrification Low Cost Gas	—	—	—	—	—	—	—	Low
Electrification and Storage	—	—	—	Low-cost storage	—	—	—	—
Electrification Macro Grid	—	—	—	—	+ Macrogrid	—	—	—
Electrification No Cross-Border Expansion	—	—	—	—	+ No new cross- border lines allowed	—	—	—
Electrification No Cross-Border Expansion Uncoordinated	—	—	—	—	Uncoordinated, no new cross- border lines	—	—	—
Electrification Uncoordinated	—	—	—	—	Uncoordinated	—	—	—
Electrification Low Cost VG	—	—	—	Low-cost VG	—	—	—	—
Electrification Low Cost VG High Gas	—	—	—	Low-cost VG	—	—	—	High
Electrification Low Cost VG and Low Cost Storage	—	—	—	Low-cost VG and storage	—	—	—	—

The table does not include hydropower sensitivities (flexibility, wet/dry, or Canadian supply sensitivities), described later in the report

^a — Indicates no change from core case for the scenario

^b Carbon

- Canada: Assumes BAU is an 80% CO₂ reduction and Carbon Constrained is a 92% reduction, which is more in line with Mid-Century Strategy, and is 80% economy-wide
- United States: Assumes BAU is state-level policies only and Carbon Constrained is a 80% reduction (in line with Mid-Century Strategy)
- Mexico: Assumes BAU is 50% clean energy standard and Carbon Constrained is a 80% reduction

^c Transmission

- Coordinated: The model builds and operates transmission in an optimal way.
- Uncoordinated: The model sees hurdle rates (cost to flow power) between regions and only builds lines that have a benefit-cost ratio above 3.
- No cross-border: The model runs the same as coordinated but without any new cross-border transmission allowed (to help understand the benefit of new cross-border lines).
- Macrogrid: The model runs as coordinated, with an HVDC (high-voltage direct current) macrogrid. Some potential benefits of this grid might not be well captured in standard modeling frameworks. The macrogrid is based on the grid for the U.S. Interconnections Seam study, with an extension into Canada.

^d Retirements

- This scenario represents potential concerns for early thermal unit retirement.
- Coal: In the Early Retirements scenario, coal is assumed to retire early based on whether the ReEDS model continues to operate with more than 75% capacity factor. This could be driven by lack of cost recovery or carbon or other pollutant policies. In BAU, only announced retirements are included.
- Nuclear: In the Early Retirements scenario, all nuclear is assumed to not be relicensed (but operates until relicensing), based on ongoing retirement concerns. In the BAU assumption, 50% of nuclear is relicensed and still operating in 2050 (based on commission date)

^e Electrification and Load Growth

- Canada: BAU (nonelectrification) cases assume 2050 load of 780 terawatt-hours (TWh) (based on Canada's National Energy Board extrapolated). Electrification cases assume 1,070 TWh (based on EnergyPATHWAYS modeling for NARIS). 2016 load is 600 TWh.
- United States: BAU (nonelectrification) cases assume 2050 load of 5,100 TWh (based on U.S. Energy Information Administration [EIA] extrapolated). Electrification cases assume 7,100 TWh (based on NREL's Electrification Futures Study). 2016 load is 3,950 TWh.
- Mexico: Because the Programa de Desarrollo del Sistema Eléctrico Nacional (PRODESEN) and the Mid-Century Strategy have similar assumptions for load growth, both scenarios are identical in load. 2016 load is 310 TWh. 2050 load is 790 TWh.
- In current runs, no hourly profile changes are considered for electrification, except optimal vehicle charging. Reference the Electrification Futures Study⁸ for more work on this topic.

⁸ "Electrification Futures Study," NREL, <https://www.nrel.gov/analysis/electrification-futures.html>.

1.3 Assumptions and Limitations

This section describes the key assumptions and limitations of NARIS so stakeholders can understand the context for interpreting the study results.

- NARIS is not a forecast or official plan for any given region or state. The scenarios were produced through specific optimization methods, so infrastructure decisions may differ from actual decisions organizations choose to make. The study analyzes a suite of scenarios to understand ways the grid could evolve and operate to help inform planners. In many cases, the optimization is shallow and there are alternative infrastructure builds with similar costs.
- This study considers enacted legislation with binding targets for renewable or clean energy portfolios that cover electricity generation at the federal or state/province levels by October 2018; it does not attempt to extrapolate local or corporate targets, or to understand how they could impact infrastructure builds. For the United States, federal policies include tax credits but no renewable portfolio rules or carbon limits for the BAU scenarios.
- More study is needed to understand dynamic concerns, including frequency stability. This study does not perform any AC or dynamic power flow modeling.
- Operational practices will continue to change between today and 2050, including the way balancing authorities interact with each other. Aside from several scenarios, this study assumes regions can efficiently trade electricity or build infrastructure if it is optimal.
- NARIS is not a detailed analysis of electricity markets. Specific market rules and participant behavior will impact the evolution and operation of the grid; the study is based mostly on optimization models and assumes overall cost-optimal resources will be developed and operated (as described in Section 2.1). The study does not attempt to determine whether generation resources will receive sufficient revenue in existing or future market structures.
- The study does not consider the impact of climate change on demand patterns, wind, solar, hydropower, or thermal generation.
- NARIS assumes decision-making at the retail (consumer adoption of rooftop PV) and wholesale (utility-scale generation and transmission) is made differently, and subject to different sets of policy assumptions. See Sections 2.1.1 and 2.1.2 for details.
- No policy recommendations are made in this report.
- All costs are in 2018 USD.

2 Data and Methods

This section provides an overview of the data, models, and methods used in NARIS; many of the models and data are documented elsewhere and are open-sourced.

2.1 Methods and Models

Figure 4 provides an overview of the modeling process used in the NARIS. Four primary modeling types underpin the analysis:

- Distributed generation market adoption: The NREL dGen model is an agent-based consumer adoption model that projects different pathways of distributed PV deployment for the residential, commercial, and industrial sectors.
- Generation and transmission capacity expansion: The NREL ReEDS model co-optimizes the build-out of generation and transmission infrastructure, subject to the assumptions in each scenario.
- Production cost (unit commitment and dispatch): The Energy Exemplar PLEXOS model simulates the operation of the power system at hourly and 5-minute time-scales.
- Reliability (resource adequacy) model: The NREL PRAS model simulates simplified system operation for every hour for 7 years of meteorological conditions (affecting wind, solar, and load profiles), and thousands of random draws of outages of thermal generators.

The same data were used throughout NARIS for different temporal and geographic scales. The distributed generation and capacity expansion models were used to explore the uncertainty in power system evolution, and then the production cost and resource adequacy models were used to study a few key scenarios in detail.

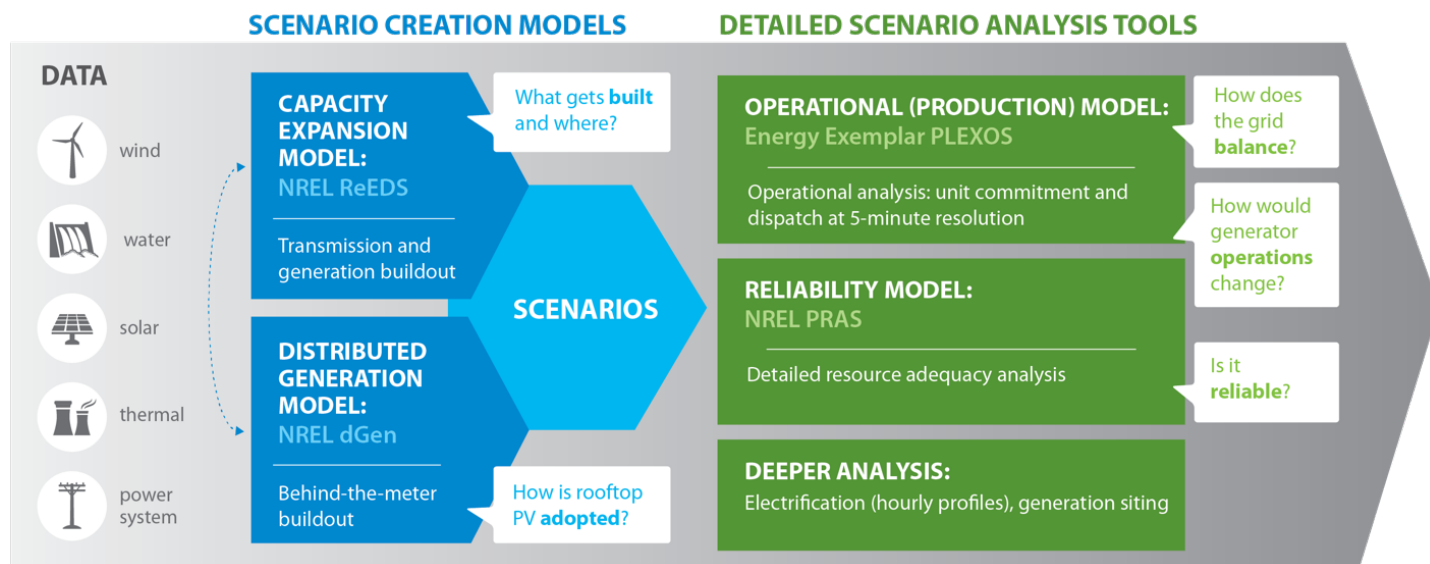


Figure 4. Modeling flow

This diagram shows the modeling flow of the key models used in NARIS, including the transmission-level capacity expansion (NREL ReEDS), distributed PV adoption (NREL dGen), production cost grid simulation (Energy Exemplar PLEXOS), and resource adequacy (NREL PRAS). The reV geospatial tool helped keep the data consistent at all modeling scales.

2.1.1 Capacity Expansion Modeling: ReEDS

The NREL Regional Energy Deployment System (ReEDS) model is an electricity sector capacity expansion model representing the North American power system. The model, through least cost optimization, evaluates the location and timing generation and transmission investments throughout the system. For a detailed explanation of the model, see Cohen et al. (2019).

ReEDS represents the diverse spectrum of generation, storage, and transmission technologies relevant to power system decision makers. As part of the modeling process ReEDS contains an endogenous representation of power system needs. These include operational requirements in electric power including, balancing demand, renewable resource availability, generation technology limits. System reliability is ensured by including planning reserve and spinning reserve requirements. Planning reserves can be served by all types of resources; capacity credits for wind and solar resources are estimated in each model region and year by estimating the contribution of these resources in periods of high load and low wind and solar generation. These estimates are done using hourly load, wind, and solar data (see Section 2.2) using 2012 meteorology. Other years are tested in the PRAS modeling (see Section 2.1.4). U.S. federal and state policies are explicitly represented, including renewable production and investment tax credits and state based clean energy policies like California's SB-100.

ReEDS selects a least-cost mix of operation and investment decisions while satisfying all modeled requirements described in this section. Model simulations occur in 2-year periods starting in 2010 (build decisions through 2020 are fixed to historical builds) and ending in 2050. In historical years, investment decisions are restricted to match the location and timing transmission and generation developments that occurred. Within each simulation, a year of operations decisions are modeled with a reduced order dispatch, using 17 representative time-slices to represent year. For each of the four seasons, time blocks of morning, afternoon, evening, and overnight hours are aggregated based on time of day in local time to form time-slices. An additional 17th super-peak time-slice is created from the top 40 summer afternoon (1 pm–5 pm) hours. Reducing the operational dispatch from 8,760 hours to 17 representative time-slices preserves seasonal and diurnal variability within the model while reducing the computational burden. Outside the simulation, more granular hourly data sets are also used by the model to estimate curtailments and the capacity value provided by variable renewable technologies.

The representation of the United States is divided into 134 balancing areas, and 356 wind and solar resource regions (Figure 5). Alaska, Hawaii, and U.S. territories are not included as part ReEDS representation of the United States; nor are nongrid connected generation and load. The U.S. aggregated transmission network is connected by 418 transmission lines (that represent interfaces between regions) among three asynchronous regions.

Table 3. Data Sources for All Three Countries in the Core Scenarios in ReEDS

Category	Canada Assumption	Mexico Assumption	U.S. Assumption
Natural gas supply curve and regional consumption	Regional gas supply curves were derived from U.S. Energy Information (EIA) Annual Energy Outlook (AEO2018) (EIA 2018) price and consumption data. Supply curves were extended to include adjacent Canadian provinces by adjusting natural gas consumption based on consumption in Canada's National Energy Board (NEB) Canada's Energy Futures 2017 (NEB 2017)	Supply curve was derived from AEO2018 (EIA 2018) West South Central region, adjusted for projected gas consumption and prices in the Programa de Desarrollo del Sistema Eléctrico Nacional (PRODESEN 2018) (SENER 2018).	Supply curve was derived from AEO2018 (See Cohen et al. 2019.)
Coal prices	<i>Canada's Energy Futures 2017</i> (NEB 2017) (province-level)	PRODESEN 2018 ^a	AEO2018
Electricity demand projections (see Section 3.5.4 for details on Electrification)	<i>Canada's Energy Futures 2017</i> (NEB 2017) Evolved Energy Research (Electrification scenario)	PRODESEN 2018 Evolved Energy Research (Electrification scenario)	AEO2018 Evolved Energy Research (Electrification scenario)
Hourly electricity demand (See Section 2.2.2 for details.)	Various provincial-level sources	PRODESEN 2018	Independent system operators (ISOs) and Federal Energy Regulatory Commission Form 714
Existing generation fleet	ABB Velocity Suite (ABB 2018) was mapped to ReEDS power control areas using spatial analysis.		
Announced retirements	Various provincial-level sources	ABB Velocity Suite (ABB 2018), AEO2018	PRODESEN 2018
Plant cost and performance	ABB Velocity Suite (ABB 2018); AEO2018		
Transmission costs	Distance per mile costs were estimated from the Eastern Interconnection Planning Collaborative Phase 2 Report (EIPC 2015). Transmission costs were \$1,347–\$2,333 per MW-mile depending on the line voltage. Spur lines connecting utility-scale solar and wind to the power system cost \$3,667/MW-mile.		
Planned hydropower builds	<i>Canada's Energy Futures 2017</i> (NEB 2017) (province-level)	PRODESEN 2018	Hydropower Vision Report (DOE 2016), ABB Velocity Suite (ABB 2018)

Category	Canada Assumption	Mexico Assumption	U.S. Assumption
Seasonal hydropower capacity factors	<i>Canada's Energy Futures 2017</i> (NEB 2017) (province-level)	PRODESEN 2018 fleetwide average	Western Electricity Coordinating Council (WECC) Transmission Expansion Planning Policy Committee (TEPPC) 2024 (West Only); National Hydropower Asset Assessment Program
Onshore wind resource supply curve	2-km x 2-km Wind Toolkit meteorological were processed using the Renewable Energy Potential model (reV) to generate cost and performance supply curves for wind. Generated data are available at the level of subpower control areas and are consistent with assumptions from the NREL Annual Technology Baseline (ATB).		
PV resource supply curve	4-km x 4-km National Solar Radiation Database solar irradiance data were processed using reV to generate cost and performance supply curves for utility-scale PV. Both utility scale (rural development) and distributed utility scale (urban development) were included with distinct resource costs consistent with the ATB.		
State renewable portfolio standards and clean energy standards	Province-level policies including the British Columbia carbon tax and New Brunswick, Nova Scotia, and Prince Edward Island renewable portfolio standards	N/A	State renewable portfolio standards and clean energy standards policies derived from regular ReEDS updates from the Database of State Incentives for Renewables
International trading rules for renewable energy certificates	N/A	N/A	State-specific trading rules from the Database of State Incentives for Renewables

Canada's Energy Future 2018 was not yet published by the National Energy Board when we finalized our assumptions and synchronized the model across the three countries. We did confirm that the key variables did not change significantly from 2017. Starting in 2019, the Canada Energy Regulator now publishes this report.

^a PRODESEN, Programa de Desarrollo del Sistema Eléctrico Nacional, <https://www.gob.mx/sener/acciones-y-programas/programa-de-desarrollo-del-sistema-electrico-nacional-33462>, accessed 2018.

The cost trajectories used for these model runs are from NREL 2018 Annual Technology Baseline (ATB), as noted above. Figure 6 plots these cost trajectories in comparison to the 2020 ATB equivalent. Note that the NARIS BAU (2018 ATB Mid case) is closer to the 2020 ATB Conservative case costs for PV and wind, and it is slightly higher in 2050. The NARIS Low Cost trajectories are generally between the Advanced and Moderate trajectories for the 2020 ATB.

These are levelized cost of electricity⁹ (LCOE) comparisons based on moderate-quality resource for both wind and solar. Note that LCOE was not used for any purpose in the NARIS modeling; however, it is a useful metric for comparisons that depend on both the cost and the performance of technologies.

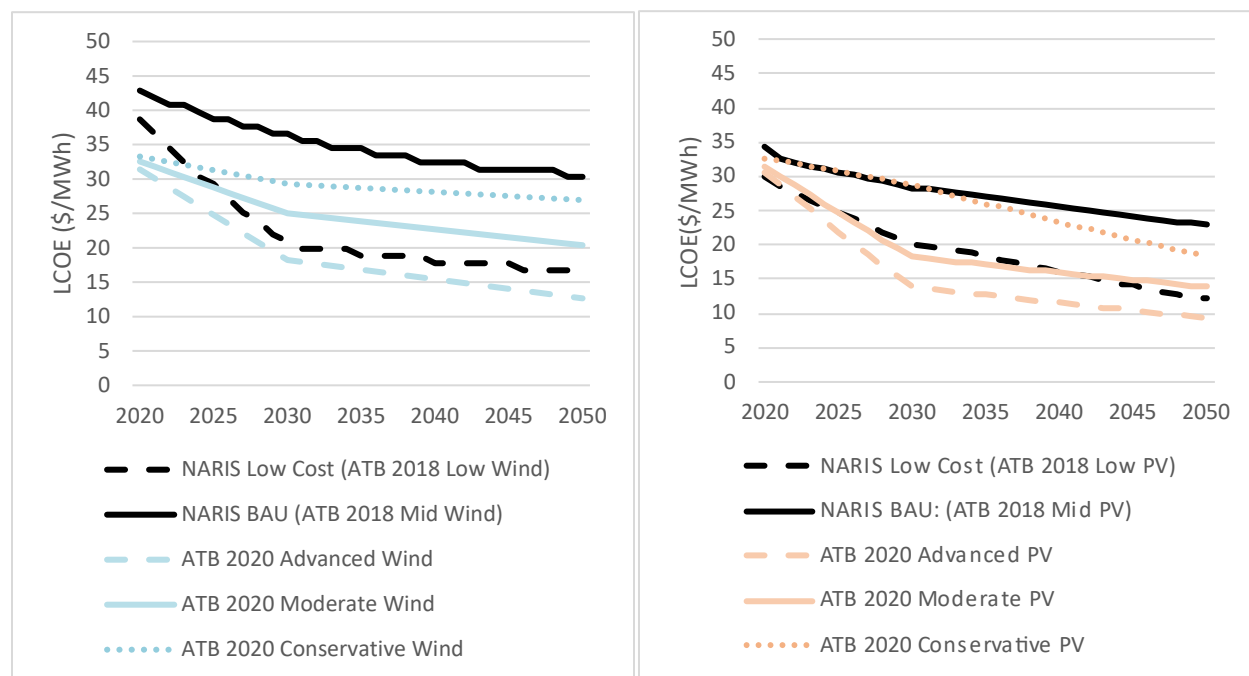


Figure 6. Cost comparison for wind (left) and solar PV (right) in the 2018 ATB and the 2020 ATB

All costs in report are 2018 USD.

2.1.2 Distributed Generation Modeling: dGen

Consumer adoption of distributed energy resources is made under a different framework than that of transmission-connected generation resources, and thus requires a separate approach. And three aspects of distributed energy resources are particularly germane to the distribution-connected versus transmission-connected discussion. First, distributed-connected resources are physically sited closer to load, leading to a different power flow than would otherwise be seen. Second, motivations for adoption are wholly different: transmission-connected resources are valued at the wholesale rate of electricity, and behind-the-meter resources are valued at the retail level. Moreover, consumers themselves have several drivers of adoption, including economic factors such as savings on electricity bills and a hedge against future rate changes, but also noneconomic ones such as environmental concerns and social influence from family and peers. Finally, a different set of policies is used to incentivize adoption of distributed energy resources than is used with utility-scale resources.

⁹ LCOE is a “summary metric that combines the primary technology cost and performance parameters” to estimate the average cost per megawatt-hour of electricity based on cost and performance assumptions. See “Equations and Variables in ATB,” NREL, <http://atb.nrel.gov/electricity/2020/equations-variables.php>.

To reflect these differences in drivers of distributed energy resources capacity expansion, we used the Distributed Generation Market Demand (dGen) model to develop rooftop PV projections for the residential, commercial, and industrial sectors.¹⁰ For NARIS, we developed new modules for Canada and Mexico. dGen is an agent-based model, representing bottom-up customer adoption. Agents are statistically representative based on sampling from distributions of customer attributes for each geography modeled. Agent sampling rates vary by country and sector, primarily because of data availability.

For the U.S. implementation of dGen, agents are sampled based on geography for the residential, commercial, and industrial sectors by county ($n = 3108$) in the United States. Thus, an “agent” represents a statistical cluster of multiple customers. For the U.S. version of dGen we used in NARIS, up to 30 agents were statistically sampled for each county (a total of 93,240 agents) based on representative distributions of features such as power consumption, rooftop size and angle.

Adoption projections in dGen are modeled through a four-step approach:

1. Generating agents (i.e., customers) and assigning them attributes based on a statistical sampling of their attributes (e.g., annual electricity consumption and roof size)
2. Applying technical and siting restrictions, such as resource quality, rooftop availability and quality for each agent
3. Analyzing cash flow to consider project costs, retail electricity rates, incentives, and net-billing/net metering policies; agents “select” PV systems that maximize their net present value
4. Projecting the future market share based on a generalized Bass diffusion model¹¹ to account for consumer behavior (Dong and Sigrin 2019). Market share is primarily determined by the system payback period, and the rate of diffusion is based on regressions of historical growth.

Technical potential is calculated in the first two steps by determining the number of developable roofs and the unshaded area. A building is “developable” if it meets shading, tilt, azimuth, and minimum area requirements (Gagnon et al. 2016); additionally, adoption is not considered for multifamily residential or renter-occupied residential buildings. In dGen for the United States, average roof sizes have been collected for each sector in each geography from Census data. Figure 7 displays the total technical potential of rooftop PV across Canada, Mexico, and the United States, ranked by capacity factor and sector. Technical potential includes all rooftop availability, subject to siting restrictions mentioned above.

¹⁰ dGen can also model distributed wind, storage, and geothermal technologies, but we focused on distributed rooftop solar for NARIS.

¹¹ The Bass diffusion model determines how quickly consumers adopt consumer goods (in this case, PV).

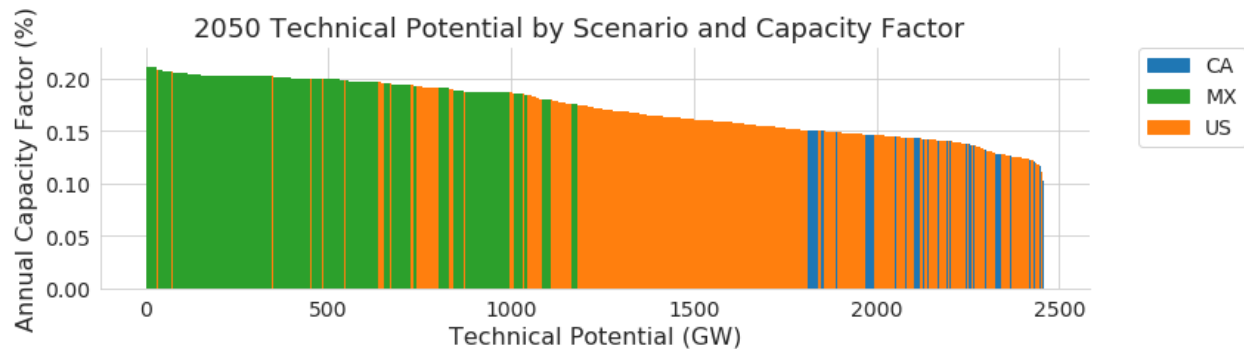


Figure 7. Distributed PV resource quality by country

This figure shows the technical potential of the rooftop resource in each country, ordered by capacity factor. Most of the best 600 GW of resource in North America are in Mexico. The United States has substantial capacity available above 15% capacity factors annually.

Within the United States, technical potential varies and is well distributed among sectors. Figure 8 displays cumulative technical potential by sector and capacity factor, with high capacity factors available in residential, commercial, and industrial sectors.

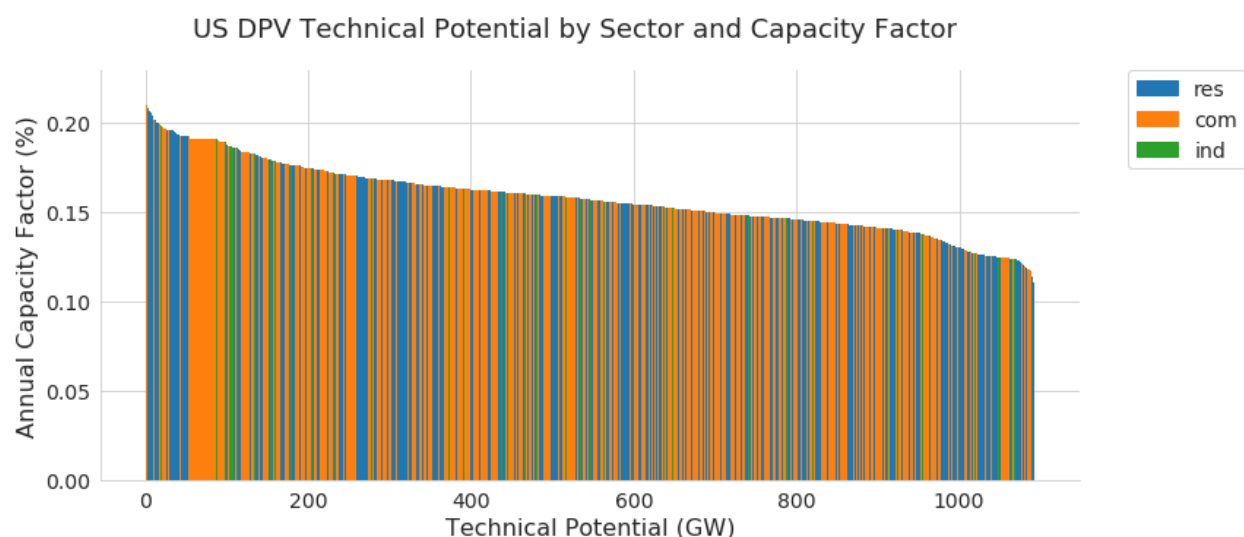


Figure 8. Distributed PV resource quality within the United States by sector

This figure shows the technical potential of the rooftop resource in each sector (residential, commercial, and industrial) within the United States, ordered by capacity factor. There is good resource in all sectors.

More than 1,000 GW of rooftop PV capacity is currently assessed to be technically feasible in the United States, but most of this is not yet economically feasible based on the NARIS modeling and assumptions. To determine the total achievable potential, dGen performs a detailed cashflow analysis for each agent to calculate the net present value of adopting solar. Various system sizes are tested to determine the economically optimal system size for a given agent based on their unique load consumption profile, solar resource availability profile, roof-size, retail rate, and financing terms. The optimal system size and net present value, once calculated, are translated into a payback period, which represents the number of years before electricity bill savings from the system's generation will offset system cost.

Previous customer surveys have solicited consumer willingness-to-adopt solar at various payback periods. The results from these surveys are aggregated to determine the rooftop PV maximum market share (Sigrin and Drury 2014). Using historical adoption data and the calculated maximum-market share, a Bass diffusion model is used to project PV market share in each year. Payback period is used to determine the maximum (i.e., terminal) market share, and a regression on historical adoption trends is used to inform the rate of diffusion for each region-sector.

For NARIS, three scenarios were examined to assess agent sensitivity to changes in PV capital costs. The scenarios were harmonized by country in real terms based on the 2018 ATB for the Mid (Reference), Low, and Constant Costs scenarios. For reference, the 2050 Mid Costs value is \$1,140/kW for residential-scale systems and \$954/kW for nonresidential-scale systems. In the Low Costs, they are \$560/kW and \$517/kW respectively; in the Constant Costs scenario, they are \$2,857/kW and \$1,936/kW respectively. Operation and maintenance costs, which include inverter replacement are \$3.6–\$17/kW-year depending on scenario and sector.

We ran scenarios incorporating existing net energy metering (NEM) policies assuming all excess generation is credited at the retail electricity rate. In a state where the NEM has expired or has a mandated expiration date, exported generation was valued at the wholesale cost of electricity whereas the self-consumed energy was still valued at the retail rate of electricity (i.e., net billing). We also ran scenarios assuming NEM policies expire and net billing persists in all jurisdictions. Figure 9 shows the annual capital cost of PV per kilowatt used by dGen by sector and scenario. Note that this cost does not include taxes, incentives, or subsidies, which are determined by country.

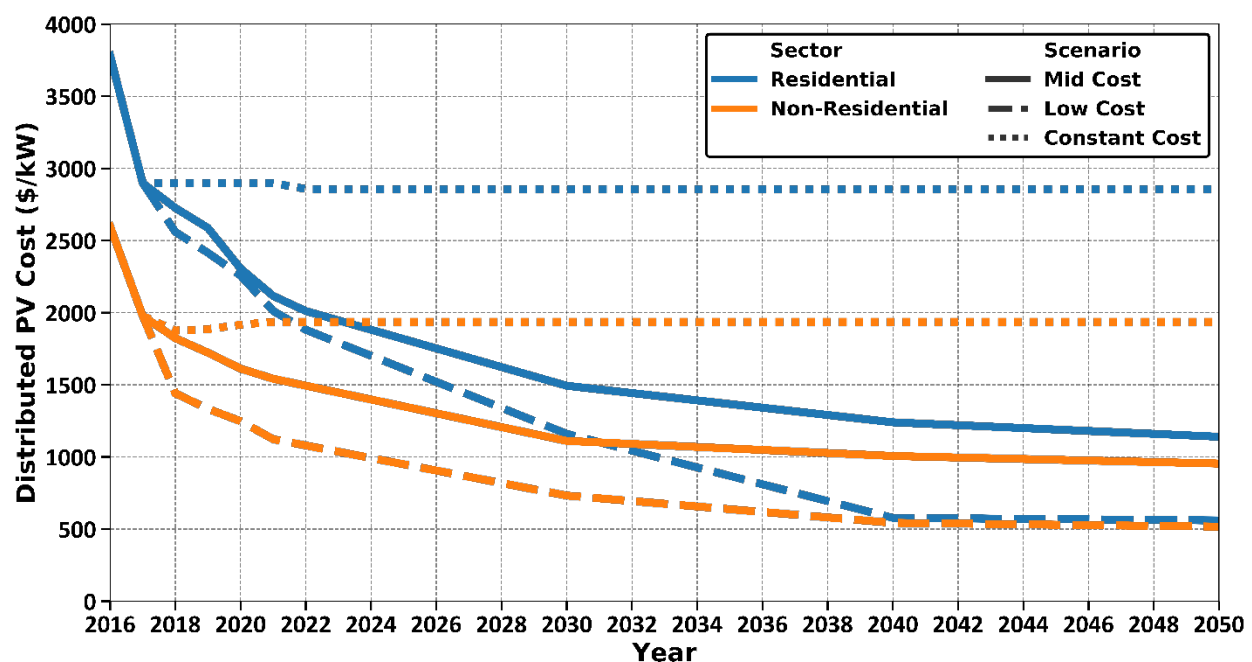


Figure 9. Cost trajectories for distributed PV

Table 4 contains a list of the data sources used by dGen, summarized for each country. For the sake of comparability, and where possible, agents across the three countries were derived from common sources. For instance, each country models the residential and commercial sector (1) using common capital cost and financing assumptions and (2) excluding consideration of multitenant buildings.

Table 4. Data Sources for dGen

Category	Canadian Assumption	Mexico Assumption	U.S. Assumption
Model resolution (number of agents sampled)	Residential sector by census division (n = 293) Commercial-sector by province (n = 10)	State-level by tariff-class (n = 1024)	10 agents per county, by sector (n = 93,240)
Building stock	Building counts by province and sector (2016 Census Program)	Counts determined by tariff classes for each state using SENER-provided data	Building characteristics sampled from Gagnon et al. (2016), Sigrin and Mooney 2018
Electrical load	See Section 2.2.2.	Annual consumption by state and tariff class Hourly load profiles based on control regions, using SENER-provided data	County-level load by sector (ABB 2013; EIA Residential Energy Consumption Survey and Commercial Buildings Energy Consumption Survey) Load profiles based on nearest weather station
Retail tariffs	Detailed calculation for current tariffs by utility using the OpenEI U.S. and International Utility Rate Database ^a		
Policies	Representation of current NEM policies and financial incentives; both assumed to expire based on statute		
Solar resource	Generation profile for 2012 meteorological year, ^b using for population-weighted regional midpoint, south-facing and tilted at latitude; building roof area based on U.S. sector-specific averages		Generation profile for 134 weather stations using TMY3 irradiance profiles.
Existing deployment	Annual installations and installed capacity by Province (2016)	System-level interconnection records (2016)	Annual installation by county and sector (2016)
Technology costs Financing	Based on 2018 ATB for residential-scale and commercial-scale PV systems		

^a "Utility Rate Database," OpenEI, https://openei.org/wiki/Utility_Rate_Database, accessed 2018.

^b NSRDB (National Solar Radiation Database), NREL, <https://nsrdb.nrel.gov>, accessed 2018.

The results from the dGen model (based on consumer adoption) were considered in the ReEDS model capacity expansion to be generation available to the system to serve load within each zone. An iteration was done between the two models to create the generation inputs for ReEDS (from dGen), and then to reestimate electricity costs for dGen (based on ReEDS outputs). ReEDS was then rerun with the new distributed generation build-out. This was done for the Low-Cost VG scenario and the BAU.

2.1.3 Production Cost Modeling: PLEXOS

To understand the operation of future power systems, we used PLEXOS, a production cost model (PCM) developed by Energy Exemplar. The PCM simulates unit commitment and economic dispatch of the future grid infrastructure built by ReEDS. In this report, all production cost modeling results are from the Low Cost VG scenario in 2050. The results of the PCM run allow us to understand how transmission and generation operations change at hourly and subhourly levels while ensuring a reliable and efficient grid. The goal of modeling with 5-minute resolution 30 years in the future is to understand the overall feasibility and implications of operations—not to make a precise forecast of the future. Overall, the goal of the modeling is to demonstrate supply-demand balance using a unit commitment model, considering forecast error, with 5-minute dispatch resolution and a nodal transmission network.

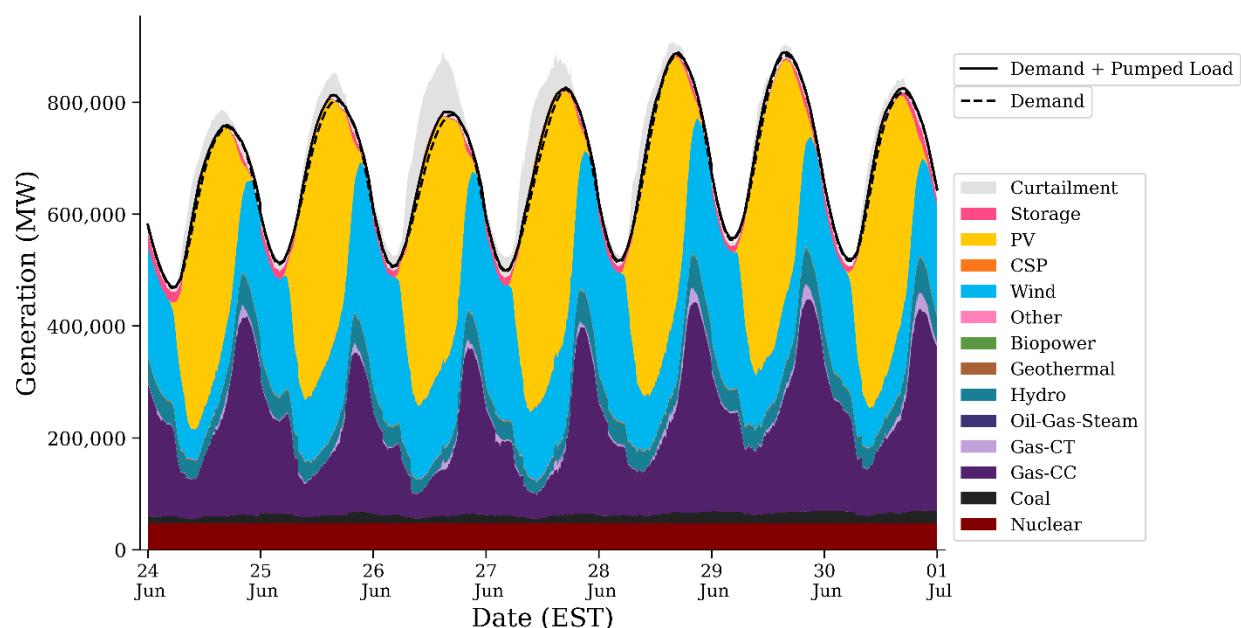


Figure 10. Sample PLEXOS output of U.S. generation dispatch stack for the week of June 24 (2050 Low Cost VG scenario)

Gas-CT: gas-combustion turbine; Gas-CC: gas-combined cycle

The production cost modeling for NARIS leverages a variety of assumptions and methods for modeling hydropower and thermal plants for the Western Interconnection (Brinkman et al. 2016) and the Eastern Interconnection (Bloom et al. 2016); assumptions about thermal unit start-up

costs, outage rates, and hydropower conditions in NARIS are from these previous studies. Key differences are described below and in the description of the data (Section 2.2).

Installed capacity assumptions in the base model represent a 2024 power system. The expected installed thermal and hydropower generation capacity in 2024 came from several sources. For the Eastern Interconnection, generation capacity, location and type came from the 2026 Summer Peak Eastern Reliability Assessment Group Multiregional Modeling Working Group power flow case. For the Western Interconnection, capacity, location, and type came from the Western Electricity Coordinating Council's (WECC's) Transmission Expansion Planning Policy Committee (TEPPC) 2024 model with updates from the TEPPC 2026 case. Parameters for the Texas Interconnection came from the Electricity Reliability Council of Texas (ERCOT). Announced retirements and retirements modeled in ReEDS¹² were removed from the model.

Some thermal operating limits for existing generators deviated from Brinkman et al. (2016) and Bloom et al. (2016). The new operating limits were developed by analyzing historical data from the U.S. Environmental Protection Agency's Continuous Emissions Monitoring Systems. The data and approach for parameterizing for production cost modeling is described by Rossol et al. (2019). That analysis provided unit-specific full load heat rates, part load heat rate curves, and minimum generation levels for every generator with enough data in the Continuous Emissions Monitoring Systems data set. Previous work (Bloom et al. 2016) used generic heat rate curves and minimum stable levels for thermal plants.

Forced outage rates, maintenance outage rates, and mean repair times for nuclear, coal, gas, oil, and hydroelectric generators were taken from North American Electric Reliability Corporation (NERC) Generator Availability Data System data (GADS 2016). The Generator Availability Data System provides detailed information by unit maximum capacity for most major generator types, and these data were applied to the PCM. Other assumptions adopted from Bloom et al. (2016) are documented in Table 5.

Table 5. Select Thermal Plant Assumptions

Hydropower assumptions are in Section 2.2.3.

Category	Gas CT	Gas CC	Coal	Nuclear
Minimum uptime (hours)	0	6	24	N/A
Minimum downtime (hours)	0	8	12	N/A
Ramp rate (% of maximum capacity per minute)	8	5	2	N/A
Start-up cost (\$/MW of maximum capacity)	69	79	129	0
Variable operation and maintenance cost (\$/MWh)	0.6	1	2.8	2.8
Annual outage rates (sum of forced and maintenance outages) (% of year)	5.69%	4.69%	7.00%	3.41%

¹² ReEDS retirements are based on both announced retirements and modeled retirements. Modeled retirements are age-based (with thermal unit lifetimes of 55–75 years) or utilization-based (for coal plants under 40% annual capacity factor). See Eureka et al. (2016) for details.

For the base PCM transmission topology, NARIS relied on nodal transmission models developed for the Eastern Interconnection and the Western Interconnection under the guidance of NERC. Power flow and dynamic base case models in the Eastern Interconnection (plus Quebec) are released by the Eastern Reliability Assessment Group Multiregional Modeling Working Group; we adopted the 2026 summer case as our base set of assumptions for the Eastern Interconnection. Line limits for the Eastern Interconnection were enforced for those lines included in the NERC Book of Flowgates. The Western Interconnection topology was originally created by the WECC TEPPC, which also provides the lines that make up the WECC Paths and define the limit to the flow along those paths. The topology for the Texas Interconnection comes from ERCOT. The lines connecting the ERCOT zones were enforced as interface constraints. The zonal representation from the Programa de Desarrollo del Sistema Eléctrico Nacional (PRODESEN) was used for the Mexican portion of the model.

Figure 11 shows the steps involved in a detailed PCM study. These steps are followed to simulate how a system operator might commit and dispatch a given system as forecasts of wind and solar availability and load are updated throughout the day. For NARIS, we did not perform the intraday simulation, but we did perform day-ahead simulations using several different estimations of uncertainty in forecasts (see Section 3.5.5).

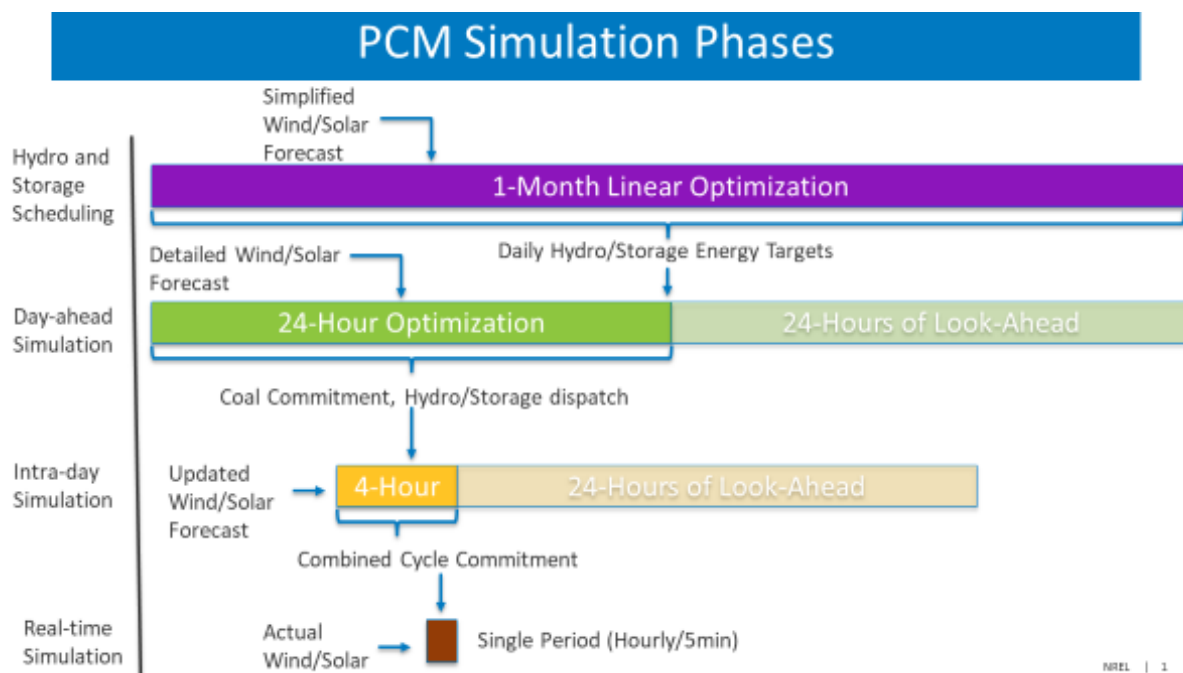


Figure 11. Simulation steps to run the PCM

PCMs are typically run as single-operator models and assume perfect information availability across regions, which is both unrealistic (leading to a solution that is lower in cost than reality) and computationally burdensome. To address these challenges and better reflect market friction and latency between operating regions, NREL designed a geographic decomposition method (Barrows et al. 2019), and we used that method in NARIS. The unit commitment and economic dispatch problem is decomposed into the independent system operator (ISO) and utility regions. This decomposition method is based on three steps: interchange forecast, decomposed unit commitment, and power flow reconciliation. This method presents two major benefits by

reflecting actual system conditions and reducing computational time by allowing parallelization of the simulation. No hurdle rate or wheeling charge is added to flow power between regions; this assumes more coordination in dispatch than occurs in today's system in some regions.

ReEDS is a zonal model, aggregating actual transmission buses, lines, generators, and loads to a single node for each zone. For the production cost modeling, full nodal detail is maintained. Therefore, new generation capacity, retirement decisions, and transmission expansion must be decomposed from the zonal ReEDS results into the nodal PCM.

The first step to translate a ReEDS result is to determine which units in the PCM are retired. For noncoal units, ReEDS provides a capacity of generation by type for each zone that should be retired. Coal units are tracked individually in ReEDS (as they tend to be larger, and fewer new ones are built), rather than as an aggregated capacity for each zone. Each PCM node is mapped back to a ReEDS zone, and PCM generation capacity within each zone is retired until the ReEDS retirement amount is reached. For noncoal units, units are prioritized for retirement based on their heat rate, retiring the least efficient units first.

The next step is to add new units. Again, ReEDS provides the expanded capacity by type for each zone. That new capacity is broken down into reasonable generator sizes and placed at PCM nodes. Nodes are prioritized for connecting new generation by first adding units to nodes with generation that had been retired, which is followed by placing units at high-voltage and well-connected (i.e., number of lines and summed capacity of those lines) nodes. New wind and solar locations are determined by reV geospatial tool (Maclaurin et al. 2019) and are connected to PCM nodes by placing them at the closest high-voltage bus.

Expanded transmission built by ReEDS is also translated to the PCM. We simplified expanded transmission by assuming all new lines are direct current (DC). This reduces the complexity of adding new alternating current (AC) lines, as new DC lines do not impact loop flow on the existing network. However, this does increase the operational flexibility of these lines. The goal of this process is to represent the ReEDS modeled increases to interregional interfaces, and DC lines do that. Bloom et al. (submitted)¹³ explore a method to expand AC infrastructure in a zonal-to-nodal translation, but those AC lines do not represent the same new interregional transfer capability. Designing AC infrastructure to expand interfaces while avoiding loop flow constraints for the entire continent is beyond the scope of NARIS. To avoid unrealistic unserved energy because of these AC loop flow constraints (with transformation of the generating fleet compared to today), the flow limits on AC lines and interfaces were allowed to exceed nonemergency ratings for a penalty cost of \$12,000 per megawatt.

In reality, the new transmission expansion may be a combination of DC and AC infrastructure, and a variety of transmission or generation infrastructure could alleviate the AC transmission constraints. Detailed regional power flow studies are needed to determine the local and regional benefits of each option. To test the potential overall cost impact of these two assumptions (DC modeling in production cost tool and penalty on AC violations), we made cost estimates of

¹³ For more information, see "Interconnections Seam Study," NREL, <https://www.nrel.gov/analysis/seams.html>.

infrastructure to solve the issue in the model. These are both overestimates of potential cost impacts, because the optimal solution would be better than this simplification. For example:

- If we calculated costs to consider the costs of making all AC ReEDS expansion lines into DC (including converter stations), the cost increase could represent 0.4% of total system costs in the Low Cost VG scenario. This is an overestimate of the impact, because not all new lines would be DC, but this gives us an idea about how significant the assumption could be. This estimate is calculated by multiplying the AC build (in GW) by the cost of the converter stations (80,000 MW * \$253,000 per megawatt assumed cost of DC converter stations).
- If new transmission infrastructure were built to augment every violated line to accommodate its maximum 5-minute violation, it would add up to 0.1% to the total continental cost in the Low Cost VG scenario (5 TW-mi of violation * \$1,347/MW-mi). Some of these costs are already considered in the ReEDS model, which includes costs for intrazonal transmission lines for new generation. Other scenarios would likely have similar adders, making comparisons of scenarios consistent without this adder.

End points for the new lines were determined by connecting strongly connected buses within the two regions between which ReEDS chose to add new transmission capacity. When possible, because new lines should relieve congestion, buses on opposing sides of an enforced transmission constraint were chosen to connect the new lines. Given the varying sizes of ReEDS regions, some new transmission capacity between two regions was modeled with multiple new lines, while other regions were modeled with just one new line. The aggregate capacity of the new DC lines between any two regions is set by the amount ReEDS expanded the transmission between them.

2.1.4 Resource Adequacy Modeling: PRAS

Resource adequacy refers to the ability of a power system to serve electricity demand with an acceptably low risk of failure because of shortfalls in power supply or deliverability. The Probabilistic Resource Adequacy Suite (PRAS [Stephen 2021]) is an NREL-developed collection of tools for quantifying this shortfall risk in terms of standard probabilistic risk metrics, such as loss-of-load hours (LOLH), loss-of-load expectation (LOLE), and expected unserved energy (EUE). PRAS estimates these metrics using a sequential Monte Carlo analysis that performs a simplified power flow (see Figure 12, page 26) to confirm supply exceeds demand for sequences of random generator outage patterns. The reported metrics for NARIS are:

- **Loss-of-load hours (LOLH):** LOLH is “generally defined as the expected number of hours per period (often one year) when a system’s hourly demand is projected to exceed the generating capacity” (NERC 2018). It is evaluated using not only the peak hours or days but every hour of the year.
- **Expected unserved energy (EUE):** EUE is “the summation of the expected number of megawatt hours of demand that will not be served in a given period as a result of demand exceeding the available capacity across all hours” (NERC 2018). For NARIS, annual EUE is reported, representing the sum of EUE in all hours of the year. It quantifies both the probability and magnitude of a shortfall occurrence, but as a result cannot distinguish between a small, likely shortfall and a large, unlikely one. EUE can also be reported as normalized EUE by expressing the expected energy shortfall as a fraction (usually in

parts per million, or ppm) of total energy demand in the period; this is convenient for comparing reliability levels across different systems.

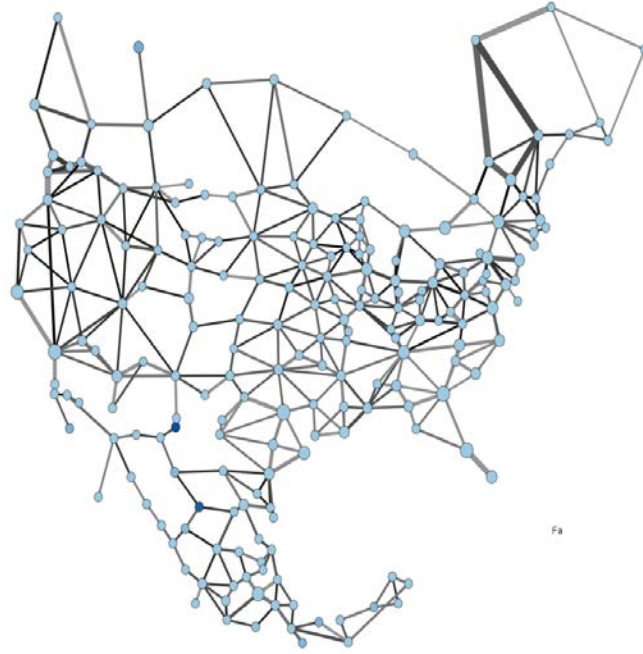


Figure 12. Transmission network representation in PRAS

Figure depicts the connectivity in the PRAS model. Circles represent regions, while lines represent interfaces.

For NARIS, PRAS was used to simulate many alternative realizations of simplified annual hourly power system operations over a year. Each realization corresponds to operations under a different collection of representatively sampled thermal generator unplanned outage profiles. The simulation performs a simplified operational dispatch on every random sample, at every period. The simplified dispatch constrains the flow between regions to the available transmission capacity while recording the time and location of events where supply cannot meet demand.

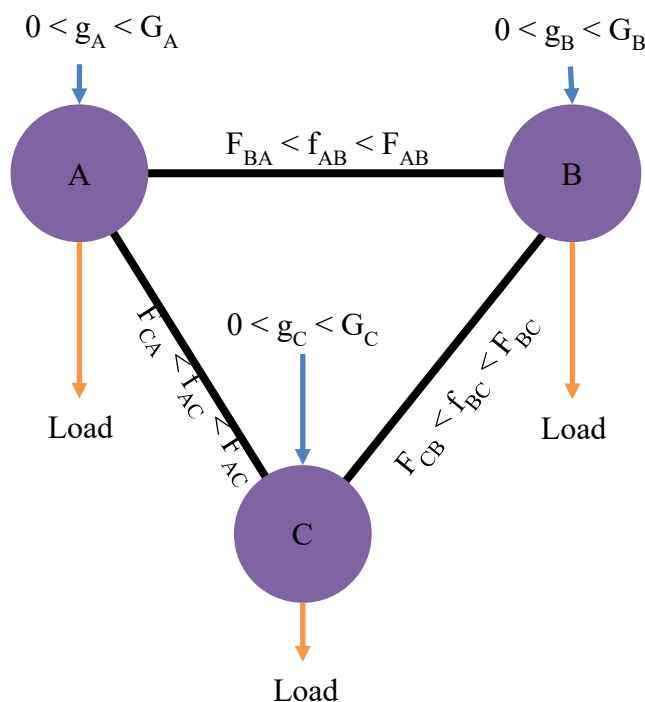


Figure 13. Diagram of PRAS zonal balancing

PRAS performs an optimized power flow (transport model) for every sample for each zone, determining whether generation and import supply is sufficient to meet demand (Load) in each zone. Constraints include enforcing that generation (g) is less than generating capacity (G) and that interface flow (f) is within flow limits (F_{AC}).

By simulating continent-wide system operations under a wide range of generator outages conditions, the risk of encountering a system state in which load is unserved because of a supply or deliverability shortfall can be quantified probabilistically and compared to risk levels of today's grid or industry standards.

To perform these simulations fast enough to make simulating hundreds of thousands of years of operations practical, PRAS makes more simplifying assumptions than a nodal static or dynamic power flow model. PRAS does not model power flow between buses but rather groups buses into regions (zones). Power transfer between buses within a single region is assumed to take place on a "copper sheet" with no intraregional transfer limits or line reliability limitations being considered. Power transfers between regions are modeled with a simple power balance ("pipe-and-bubble" or transport model)¹⁴ representation constrained by the thermal capacities of interregional lines (in NARIS, all lines were assumed to be 100% reliable). The operational objective was to minimize the system's unserved energy, and unit-level generating costs were not considered.

These simplifications are consistent with commercial resource adequacy models used in industry (e.g., the NERC Long-Term Reliability Assessment). Resource adequacy is a necessary, but not sufficient, condition for power system reliability, and resource adequacy modeling is intended to

¹⁴ The transport model assumes all lines and interfaces are controllable, and it is different from a DC-optimal power flow model, which ensures Kirchhoff's voltage law is respected.

complement, not replace, other kinds of modeling that can evaluate additional operating considerations, such as generator flexibility (ramp rates and unit commitment constraints), AC power flow feasibility, and transient stability issues, albeit for many fewer potential operating conditions.

Capacity expansion models such as ReEDS perform a simplified internal resource adequacy assessment to maintain computational tractability.¹⁵ For systems with large contributions of variable and energy-limited resources (e.g., storage), such as those being studied in NARIS, it is desirable to supplement this basic evaluation with a more rigorous probabilistic risk assessment using a dedicated resource adequacy tool such as PRAS. In this case, the generation and transmission build-out determined by ReEDS is provided to PRAS, which reports probabilistic risk metrics (LOLE and normalized EUE) corresponding to the system build-out.

PRAS is run hourly with wind, solar, run-of-river hydropower, and load time series data as described in Section 2.2 (the 7-year period represents over 60,000 hours). PRAS was configured in NARIS to ignore monthly energy constraints associated with reservoir hydropower, thus treating this class of resource as capacity that is available to be dispatched. PLEXOS modeling for NARIS demonstrated that hydropower does have the flexibility to contribute significantly during the most important hours (Section 3.4). Pumped-storage hydropower and ReEDS-built storage (mostly 4-hour batteries) were dispatched as energy-limited storage resources. These storage resources are optimized for providing capacity; they charge when capacity is available in a region, and discharge only when it is needed. Market operations of a storage device could potentially reduce the ability of storage to provide capacity to a region, specifically if forecasting error led to suboptimal storage dispatch.

PRAS was developed in part to improve on existing techniques for representing transmission-constrained systems that include significant generation from variable renewable sources that are correlated with load. The key limitations to PRAS are the data inputs (which are limited to the 7 years for which we have consistent, time-synchronous load, wind, and solar data), and zonal transmission representation. N-1 analysis and dynamic transmission modeling are important for overall reliability assessment, but these are not considered in adequacy analysis. In this report, the PRAS results for the 2024 model and 2050 in the Low Cost VG and BAU scenarios are described. See Section 3.2.1 for a comparison with modeling from NERC and others.

¹⁵ ReEDS uses a planning reserve margin, with wind and solar resources contributing based on an hourly estimate of the most important hours in each region.

2.2 Data

2.2.1 Wind and Solar Resource

High-quality, highly resolved wind and solar resource information is important for understanding how the North American grid could evolve and operate in the future. Figure 1 (page 4) shows the wind and solar resource throughout the continent. The solar data for NARIS (see Figure 1) were developed using NREL's National Solar Radiation Data Base, which is based on satellite-based observations of the atmosphere. The database has a 4-km by 4-km spatial resolution and half-hourly temporal resolution covering the 18 years from 1998 to 2017.

We used the Weather Research and Forecasting model (WRF)¹⁶ (Skamarock et al. 2008) to simulate wind speeds for Mexico and Canada by extending existing WRF runs for the United States. The WRF model is a community numerical weather prediction model maintained by the National Center for Atmospheric Research in the United States. It has been successfully applied to wind studies and resource assessments (e.g., Draxl et al. 2013; Carvalho et al. 2014;; Garcia-Diez et al. 2012; Ji-Hang et al. 2014; Lundquist et al. 2014). The WRF model allows for accurate simulations of winds near the surface and at heights that are important for wind energy purposes. WRF's ability to downscale to required resolutions allows for modeling mesoscale features, such as fronts, sea breezes, or winds influenced by orography, which are all important factors in describing the wind characteristics over the North American continent.

For NARIS, data were simulated over Mexico and Canada and output every 5 minutes on a 2-km grid following the WIND (Wind Integration National Dataset) Toolkit setup for the United States for consistency. The details of the setup, and meteorological validation, are available in Draxl et al. (2015). The simulations for Mexico and Canada were different than the WIND Toolkit setup in only a few aspects.¹⁷ Figure 14 shows the three different domains that were used in the study; all three are publicly available. Most wind sites in Canada were in Domain A. To ensure consistency with Domain A, Domain B sites were bias-corrected using time-synchronous information from nearby sites in the area overlapping Domain A and Domain B. We bias-corrected the wind speeds and confirmed that annual power output shows no bias between Domain A and Domain B in and near the overlapping region.

¹⁶ "Weather Research and Forecasting Model," National Center for Atmospheric Research, <https://www.mmm.ucar.edu/weather-research-and-forecasting-model>.

¹⁷ A few changes were needed because of numerical stability and the switch to a newer WRF version. The Mellor–Yamada–Nakanishi–Niino boundary layer parameterization was used. And for numerical stability, we changed the mixing term (dif_opt = 2) and added time off-centering for vertical sound waves (epssm = 0.5), no nudging was applied. Moreover, we upgraded to WRF v3.7.1 with recent versions of netcdf (4.6) with pnetcdf for faster implementations.

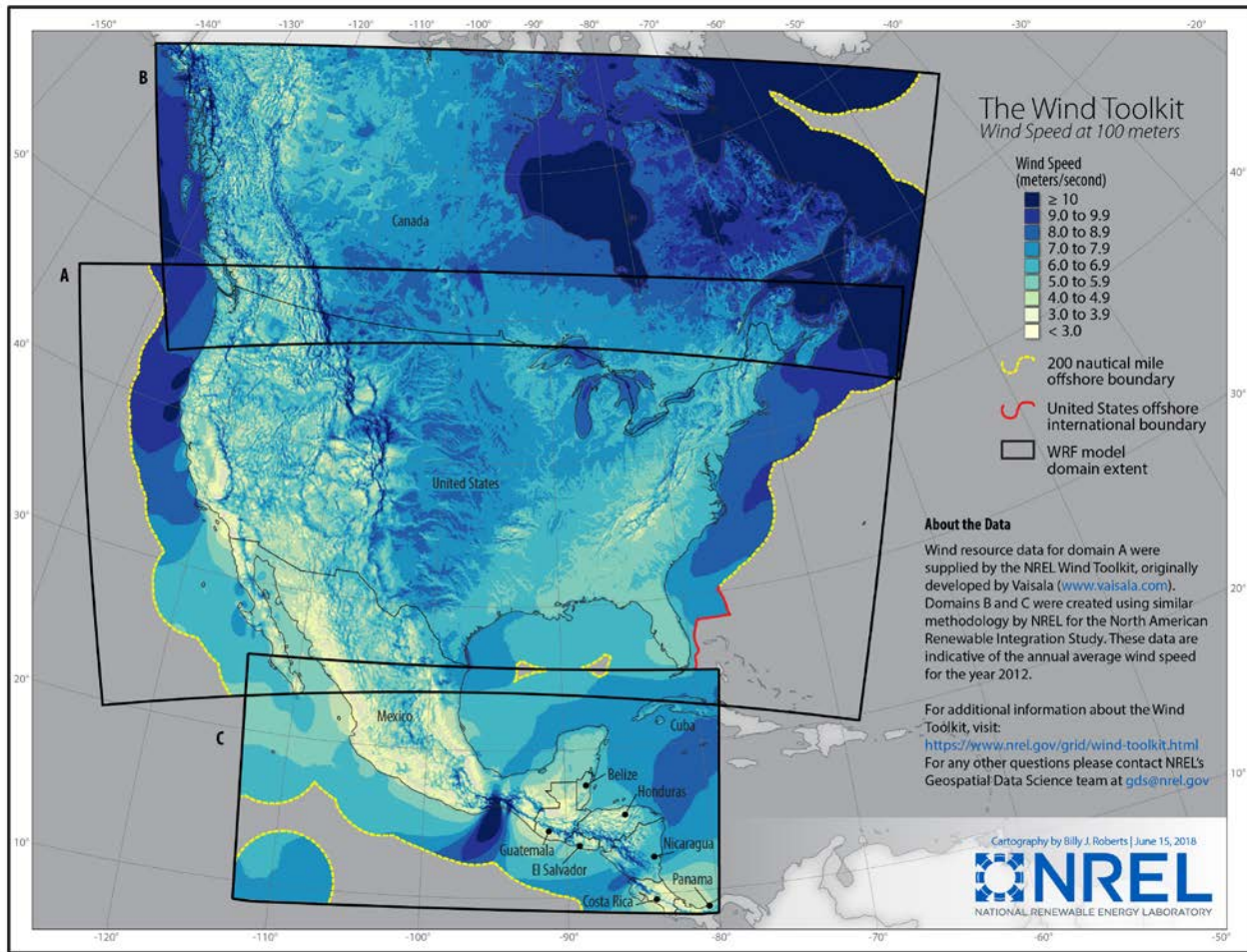


Figure 14. The three domains used in NARIS for wind modeling

Wind and solar data were processed using the NREL System Advisor Model to determine 5-minute resolution generation profiles. All the wind¹⁸ and solar¹⁹ data sets are publicly available in their native resource formats. The cost and performance projections for capacity expansion modeling were consistent across the continent with the 2018 ATB. The amount, location, and transmission spur line costs for new onshore wind and PV resources in NARIS were assessed using reV (Maclaurin et al. 2019; Rossol, Buster, and Bannister 2021) for input to ReEDS and other models. The modeled wind turbine power curve is consistent with improvements made for the 2019 ATB. The wind turbine technology used for the 2050 PCM was based on future technology performance projections from the 2019 ATB (Cole et al. 2019) to better represent the specific power curve of a future (circa 2030) wind turbine.²⁰ For utility-scale solar PV, panels with inverter loading ratios of 1.3 and 1-axis tracking were assumed (and parameters from the 2019 ATB were also used). For distributed PV, a mixture of orientations, including flat and a

¹⁸ “NREL Wind Integration National Dataset,” NREL, <https://registry.opendata.aws/nrel-pds-wtk/>.

¹⁹ “NSRDB: National Solar Radiation Database,” NREL, <https://nsrdb.nrel.gov/>.

²⁰ Icing impacts were modeled as reducing the plant output to zero when the temperature was below 0°C and 95% humidity; low-temperature cutout was assumed to happen at -35°C

variety of tilted orientations based on Sigrin et al. (2018) were assumed (Gagnon et al. 2016). Day-ahead forecasts were used for wind and solar based on the European Centre for Medium-Range Weather Forecasts (ECMWF). The ECMWF historical data were downloaded and processed using identical System Advisor Model parameters. Continent-wide real data time series were insufficient to tune any of the state-of-the-art solar forecasting methods (e.g., Dobbs et al. 2017). The WRF model has also been extended to improve solar forecasting with WRF-Solar,²¹ but it was not used for NARIS.

The wind forecast data were bias-corrected with simple annual correction factors based on the ratio of annual generation in the forecasts to actual generation. The forecasted profiles were blended with the actual profiles at various ratios to produce the forecasts described in Section 3.5.5. The 10% mean absolute error (MAE, see formula below) wind forecast was created with a 1/3 actual, 2/3 forecast blend (MAE calculated at plant-level and then averaged). This approach represents improvements state-of-the-art wind power forecasts have over the raw ECMWF implementation, which is intended for a wide variety of uses and has less-granular spatial resolution than the WRF model. The 5% MAE wind forecast was created with a 2/3 actual, 1/3 forecast blend, and represents an intraday forecast time horizon.

$$MAE = \frac{\sum_{i=Site} \sum_{t=time} |Actual_{i,t} - Predicted_{i,t}|}{Number\ of\ Sites \times Number\ of\ time\ intervals}$$

2.2.2 Load

Load data were obtained from a variety of sources for 2007–2015. The multiyear time series is important for consistent time-synchronous patterns with the 2007–2013 wind and solar data. The sources of the data were:

- **Independent System Operator (ISO) and Regional Transmission Organization (RTO) Regions:** For ISO/RTO regions, the load data were either downloaded or requested at the most granular spatial resolution available to the public.
- **Utilities:** For utilities outside ISOs in the United States, data were obtained from Federal Energy Regulatory Commission Form 714. For Canada, data were obtained from provincial sources directly for regions outside ISOs.²²
- **Mexico:** For Mexico, load data from PRODESEN 2018 were used in NARIS.

All load data were cleaned of problems, which were often either erroneous time zone stamps or erroneous data during the hours of switching to or from Daylight Savings Time. The data were extrapolated to 2050 for most scenarios by a simple scalar factor based on extrapolated annual demand projections from the U.S. Energy Information Administration (EIA), Canada’s National Energy Board (NEB), and Mexico’s Secretaría de Energía (SENER). This means the annual energy demand for all meteorological years is identical for 2050, but the peak demand and hourly shapes are different. The load factor for each year will be the same because the scalar multiplier is the same for every hour; this will also preserve all correlations between load, wind,

²¹ “WRF-SOLAR,” National Center for Atmospheric Research, <https://ral.ucar.edu/pressroom/features/wrf-solar>.

²² Hourly profiles for Prince Edward Island were taken from the hourly shapes from New Brunswick, scaled to peak load in Prince Edward Island.

and solar for the future year analysis. The exception to these descriptions is the electrification scenarios, which are discussed in Section 3.5.4.

2.2.3 Hydropower

Hydropower generation is a potential source of flexible, carbon-free generation and storage to the grid. Hydropower technologies in North America include run-of-river hydropower (which has power outputs that depend primarily on water inflow at any given time), reservoir hydropower (which can store significant amounts of water and shift energy), and pumped-storage hydropower. The operation of hydropower turbines is very flexible. The overall constraints to hydropower flexibility can be complicated to model, as they come from various physical and institutional sources. Some of these key sources include:

- **Cascading Constraints (Physical):** When hydropower generators exist in a series of cascaded reservoirs in a basin, the inflows at lower reservoirs depend on the outflows from upper reservoirs.
- **Hydrology Constraints (Physical):** When and where water becomes available to dams is a key constraint on hydropower flexibility and generator outputs. In some seasons, even large reservoirs can fill and need to flow water at high levels at all times.
- **Flow Requirements (Institutional):** Requirements for water usage from downstream users for agricultural, recreational, environmental, and other needs impact mandatory flow requirements from dams. These detailed constraints are generally not modeled in power systems models, but are represented with proxy variables for minimum generation, ramp rates, and other characteristics.

For NARIS, the starting point for hydropower dispatch assumptions were the assumptions used in the Eastern Renewable Generation Integration Study (Bloom et al. 2016) for the Eastern Interconnection, the California Low Carbon Grid Study (Brinkman et al. 2016) in the Western Interconnection, and PRODESEN in Mexico. These assumptions were refined based on feedback from the NARIS Technical Review Committee for the PLEXOS modeling. Refinements included:

- Energy limit adjustments for generators in the Hydro Quebec, Manitoba Hydro, and Bonneville Power Administration service areas.
- More-constraining ramp rates for Eastern Interconnection and Hydro Quebec generators. For Hydro Quebec, this helped act as a proxy for cascading constraints²³ that are not included in the continental model.
- Refinements to the timescale of flexibility (e.g., optimization over a day or a week, and pure run-of-river with no adjustability) at various dams in the Hydro Quebec and Bonneville Power Administration service areas.

²³ Cascaded reservoirs have complicated intertemporal interactions that require significant data inputs and add computational complexities to the modeling. These constraints are typically not included in interconnection-sized production cost studies. In the Western Interconnection, the flexibility limits caused by these types of constraints are often modeled by constraining the outputs of individual dams to historical flows (e.g., treating dams as run of river). For Hydro Quebec, we constrained flexibility with a ramp rate to represent the system-wide ramping limitations of a cascaded system. We also added ramping limitations to the generators in the Eastern Interconnection—including limitations not used in previous studies—to address cascading and other flexibility limitations.

On average, these changes better represent the flexibility of the hydropower generation. See Section 3.4.3 for detailed analysis of hydropower flexibility results from the modeling. Table 6 shows some of the key sources and values for hydropower assumptions in the NARIS PLEXOS model.

Table 6. Hydropower Assumptions^a

Metric	Eastern Interconnection	Western Interconnection	Quebec Interconnection
Water-year used to estimate energy limits (hourly, monthly, or daily) ^b	2006	2005	Multiyear average
Energy limit sources	Eastern Renewable Generation Integration Study (original sources include U.S. EIA, Southwestern Power Administration, Southeastern Power Administration, U.S. Army Corps of Engineers, and provincial sources) ^a	Western Electricity Coordinating Council and Bonneville Power Administration	Hydro Quebec
Monthly, daily, and hourly (run-of-river) optimization windows (capacity-weighted percentage) ^b	79% Monthly 12% Daily 9% Hourly	50% Monthly 11% Daily 39% Hourly	100% Monthly
Ramp rate (Percentage of maximum capacity per minute) ^d	1.1%	0.5%–1.6%	0.2%–0.5%
Minimum generation level range (Percentage of maximum capacity) ^e	0%–20%	0%–45%	20%

^a The table does not include pumped-storage hydropower.

^b The water-years are intended to be reasonable representations of a “typical” year. Using time-synchronous data is less important with hydropower than it is with wind, solar, or load because the hourly shapes of the water flows into a reservoir are not necessarily correlated with the actual power outputs from the dam.

^c The optimization windows represent the time-frames in which the hydropower generation can shift energy. A daily limit would limit the total generation from that unit within a day, subject to the other constraints. For the Eastern Interconnection, the optimization window does not reflect a plant-specific representation; generic parameters were used until dispatch looked similar to historical dispatch (see below for a description). Hydropower in Quebec has more than monthly flexibility; interseasonal and interannual flexibility were not studied in NARIS.

^d This value constrains the ramp rates of the generators. It is directly comparable to assumed ramp rates for thermal plants in Table 5.

^e For the Eastern Interconnection and the Quebec Interconnection, a minimum generation value of 20% of maximum capacity was assumed, or the largest value feasible if monthly energy limits require capacity factors of less than 20%. See below for an analysis of minimum generation levels by season.

The mixture of flexibility timescales, minimum/maximum generation levels, energy limits, and modeling methodologies lead to different flexibility characteristics at different times of the year. To dispatch the hydropower generators with monthly optimization windows, the PLEXOS model runs a simplified monthly dispatch called the MT (Medium-Term) model that categorizes every hour of each month into five categories (or time-slices). It then optimizes dispatch for these time-slices and then determines a daily energy limit for each generator. This energy limit is then optimized in the unit commitment model, along with the hydropower with daily energy limits. The hydropower generation is locked in during the unit commitment, and it does not re-optimize during real-time dispatch.

The goal of NARIS was to represent the overall regional character of the dispatch of hydropower generation—not to accurately represent unit-specific detail for every generator. The character of the hydropower dispatch profiles is qualitatively similar to what was seen in ISOs in 2017, based on figures in the 2017 Hydropower Market Report (Uria-Martinez et al. 2018).

For context, the fall week studied in Section 3.4.3 demonstrates the bounds of operation that these hydropower flexibility assumptions provide. In the United States, there is about 50 GW of operating envelope between minimum generation levels (which coincide with low-load periods) and maximum generation levels (which coincide with high-load periods), providing a reasonable look at the available flexibility given these assumptions. About 27 GW of this 50 GW is in the Western Interconnection, and the rest is in the Eastern Interconnection.

Figure 15 shows the weekly maximum and minimum values of U.S. hydropower generation in the PLEXOS model. The figure is one way of visualizing the flexibility the model allows the hydropower, although there are limitations within the envelope of operation (e.g., ramping and daily/hourly limits). The minimum is on average 50% less than the average weekly operation, and the maximum is less than double the average for a typical week. Different regions may have differing levels of flexibility, depending on season, water conditions, and other factors.

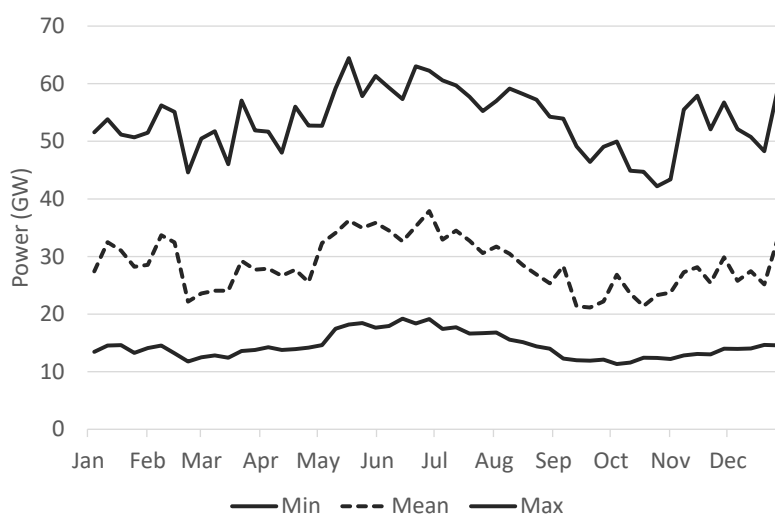


Figure 15. Weekly maximum, mean, and minimum hydropower generation from U.S. generators

These weekly maximum and minimum values show the envelope within which hydropower operates in the United States. A variety of factors (including ramping limits, daily limits, and hourly limits) further limit the flexibility within this envelope.

To test the impacts of these flexibility assumptions we ran model sensitivities with flexibility eliminated from conventional hydropower resources (treating everything as run of river). Section 3.4.4 presents the results of this analysis, which demonstrate the benefits of hydropower flexibility to a future scenario with very high wind and solar generation.

3 Results

In this section, we discuss the key conclusions of NARIS for the United States. Although many conclusions are not easily categorized, they are presented in separate sections for improved readability: overview (Section 3.1), adequacy (Section 3.2), transmission (Section 3.3), flexibility (Section 3.4), and general scenario conclusions (Section 3.5).

3.1 Scenario Overview

Figure 16 and Figure 17 show the U.S. annual generation and capacity respectively by technology type in the core scenarios compared to a near-term (2024) year in the model. 2024 was selected as a near-term year because the composition of the power system in that year is reasonably well known and that is the basis year for the planning cases used to develop some of the models (see Section 2.1.3). The scenarios were designed using traditional planning methods (using regional planning reserve margin constraints in the ReEDS model) and we demonstrated capacity adequacy using stochastic Monte Carlo methods in PRAS.

Consistent among the scenarios are the major growth in wind generation and the reduction in thermal generation (including coal, nuclear, and natural gas). The largest variation in the core scenarios is the overall increase in generation (mostly from wind) in the Electrification scenario. Another significant difference is the reduction in gas generation in the scenarios that include a carbon limitation (80% reduction in the Carbon Constrained and Electrification relative to 2005 Emissions). All scenarios have a reduction in coal and nuclear generation, and an increase in wind and solar. Gas and hydropower generation and capacity was consistent in most of the scenarios (but gas is higher in the BAU versus 2024 and the other core scenarios). Renewable contributions in the scenarios studied vary from 50% (BAU) to 79% (Electrification), and the Low Cost VG and Carbon Constrained scenarios were at approximately 70%.

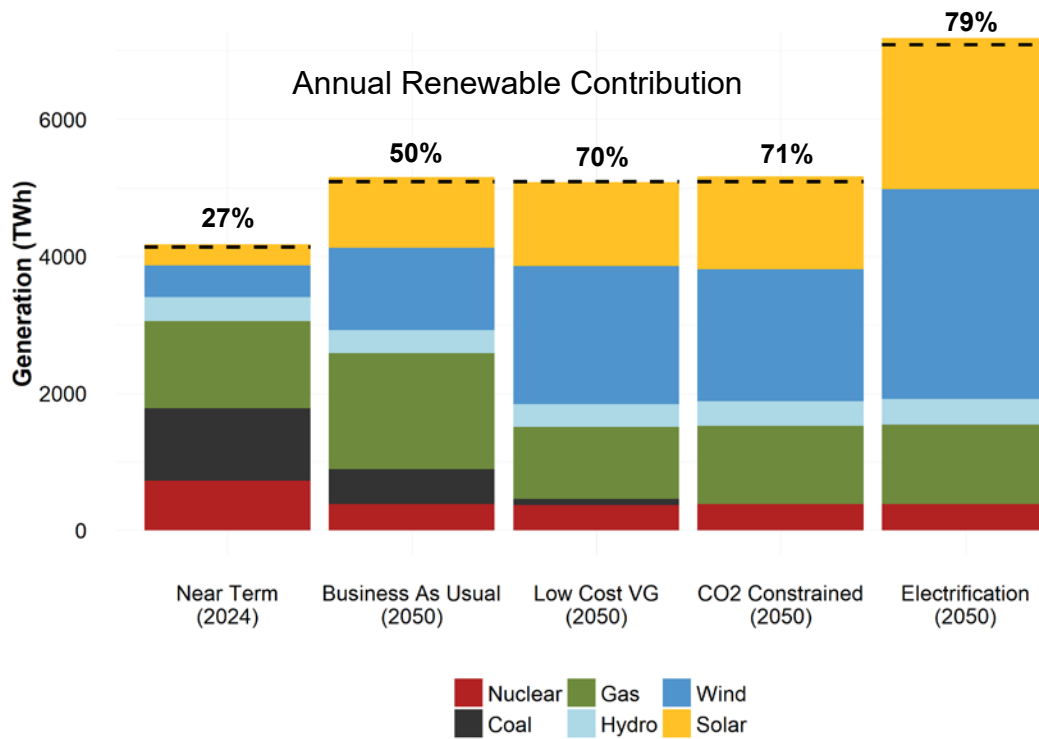


Figure 16. U.S. generation in 2024 and 2050 in the NARIS core scenarios

The dashed lines represent U.S. load (including losses). When the bars are above the load lines, net exports to Canada are happening. See Section 3.3 for a discussion of international trade, which varies widely between scenarios.

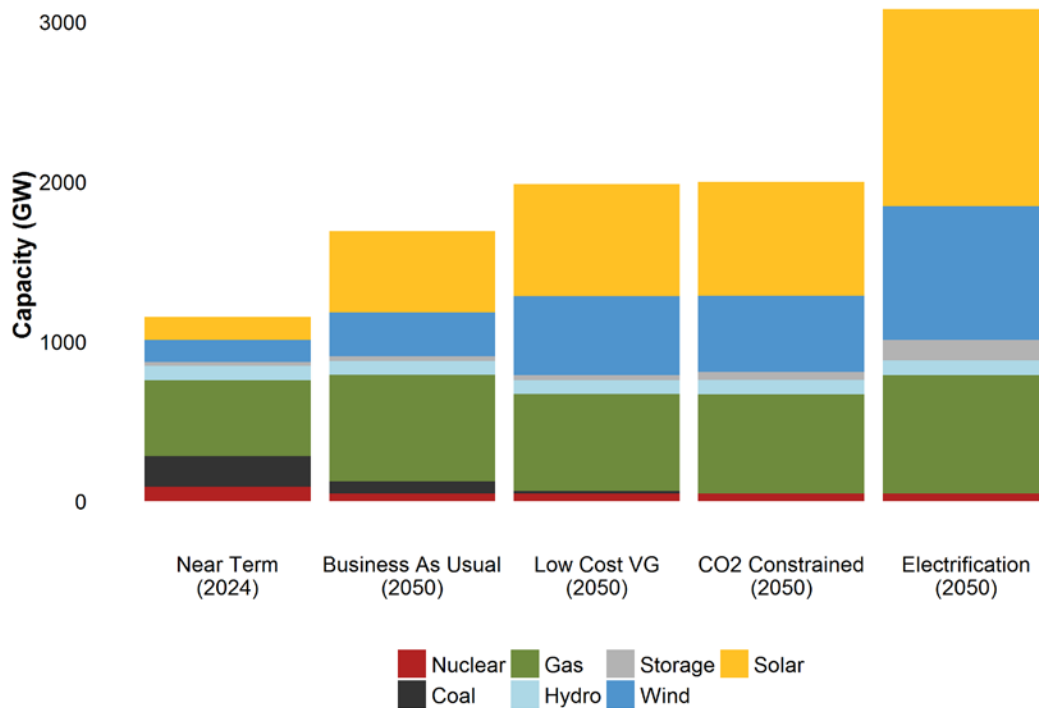


Figure 17. U.S. generation capacity in 2024 and 2050 in the NARIS core scenarios

Pumped-storage hydropower is reported in the Storage category throughout the report.

Table 7. U.S. Generation Capacity (GW) in 2024 and 2050 in the NARIS Core Scenarios

Type	Near-Term (2024)	BAU (2050)	Low-Cost VG (2050)	Carbon Constrained (2050)	Electrification (2050)
Coal	190	80	20	0	0
Gas	470	670	610	620	740
Hydro	90	90	90	90	90
Nuclear	50	50	50	50	50
Solar	140 (20 rooftop)	510 (60 rooftop)	700 (160 rooftop)	710 (60 rooftop)	1230 (60 rooftop)
Storage	20	30	30	60	130
Wind	140	280	490	480	840

Values are rounded to the nearest 10 GW. Rooftop PV capacities are given in parentheses. Note that the dGen model was not run with new building-level demand assumptions for the Electrification scenario, so trajectories for electrification scenarios follow either the BAU or Low-Cost scenarios for rooftop PV.

The modeled deployment of technologies in the CO₂ Constrained scenario is very similar to the that of the Low-Cost VG scenario. The detailed hourly and 5-minute integration analyses focus on the Low-Cost VG scenario. More methodology development is needed to understand the hourly impacts of electrification and how flexible additional electrified end-use demands could be. This scenario is useful for comparison with the others for many key metrics, but we did not do any unit commitment or resource adequacy modeling with it. Future work (along with the recent Electrification Futures Study for the United States) could help address more-detailed issues about operations in this scenario. Some technologies (e.g., nuclear and fossil fuels with carbon capture) have assumed costs that are too high for large-scale adoption in these scenarios. However, cost breakthroughs and newer technologies (e.g., small modular reactors) could change that conclusion. For NARIS, we assumed no breakthrough changes to those technologies to understand how the grid could evolve without large-scale technological breakthrough. Any additional cost breakthroughs would help reduce overall costs. Over 99% of the wind deployed in these scenarios is onshore; ongoing changes to the North American offshore wind market and state legislation will likely change that conclusion.

Figure 18 shows the fraction of generation coming from renewable generators. Although the Low Cost VG and the CO₂ Constrained scenarios are quite similar in 2050, there is divergence in the middle years. Less-expensive wind and solar in the Low Cost VG scenario accelerates high adoption of renewables more than the other scenarios, with slowed development after 2030. The more aggressive carbon limit in the CO₂ Constrained and Electrification scenarios diverges from the BAU scenario by the early 2030s. Final renewable contributions in carbon-limited scenarios surpasses or equals the Low-Cost VG case by 2050. See Section 3.5 for discussion of emissions impacts.

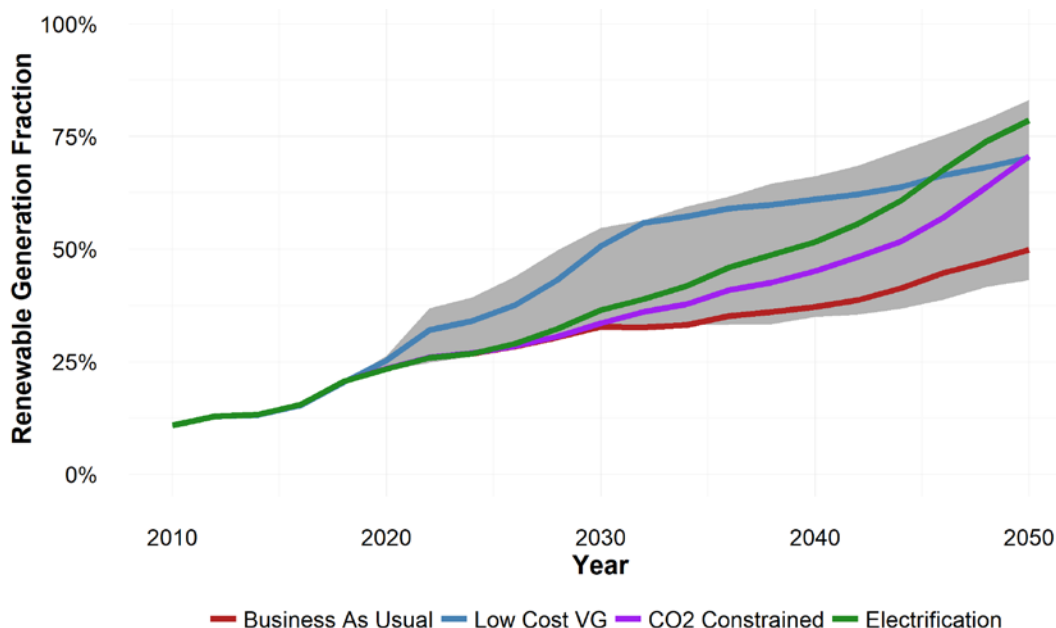


Figure 18. Fraction of generation coming from renewable generators in the United States

Core scenarios are colored. The shaded region represents the envelope of all scenarios.

3.2 Adequacy

3.2.1 Resource adequacy can be maintained in low-carbon scenarios through 2050.

To examine resource adequacy in the U.S. power system, we used PRAS to calculate EUE and loss of load hours (LOLH) from selected scenarios as built by ReEDS. As described in Section 2.1.4, PRAS can compute several common resource adequacy metrics. For NARIS, we focused on EUE and LOLH for consistency with the NERC 2020 LTRA (NERC 2020). EUE can be aggregated by country or continent, while the LOLH does not scale with system size, so the reported values are summary statistics of the NERC Assessment Areas. EUE, which is reported in megawatt-hours (MWh) and parts per million (ppm), is the unserved energy as a fraction of the total demand.

We began by assessing the adequacy of the BAU 2024, BAU 2050, and Low Cost VG 2050 scenarios as built by ReEDS. Each scenario is assessed over 7 historical meteorological years, which affects the scenario's load, wind, and solar generation output at an hourly time-scale. For each scenario and meteorological year²⁴ combination, we generated 10,000 sequential Monte Carlo samples of the year and used those samples to calculate EUE for each region in each hour. We report total EUE for each meteorological year, along with the average across meteorological years, for each scenario in Table 8. The NERC 2020 LTRA assessment for 2022 is also included

²⁴ Unusual weather events are taken into account in the 7 years of continental meteorology. Using historical years allows greater precision in wind, solar, and load modeling than using modeled future data. However, we did not consider the impacts of climate change on wind, solar, or load patterns in NARIS.

for reference. The methods are similar, but not identical, so the numbers are not directly comparable.

Table 8. EUE by Scenario and Meteorological Year for the United States, Compared to NERC LTRA

The top part of this table presents results from the PRAS modeling for NARIS. EUE values rounded to the nearest MWh or the nearest 0.1 ppm. U.S. regions only.

Meteorological Year	BAU 2024		BAU 2050		Low Cost VG 2050	
	MWh	ppm	MWh	ppm	MWh	ppm
2007	0	0.0	0	0.0	0	0.0
2008	0	0.0	0	0.0	0	0.0
2009	0	0.0	0	0.0	0	0.0
2010	0	0.0	5,834	1.2	16,864	3.4
2011	0	0.0	10	0.0	4	0.0
2012	0	0.0	0	0.0	158	0.0
2013	0	0.0	0	0.0	0	0.0
Annual Average	0	0.0	835	0.2	2,432	0.5
NERC 2020 LTRA Values for Comparison						
2022 Assessment Year ^a	12,845	2.7				

^a WECC-CAMX (California and Mexico) region is excluded from this average because it was an outlier in the 2022 and 2024 assessment years, with over 1,000,000 MWh of EUE.

The results demonstrated adequacy generally comparable to or better than the 2020 NERC LTRA for the contemporary grid for the scenarios examined. All scenarios had at least five times lower EUE compared to today's grid. The NERC assessments are done using industry tools and variety of statistical methods (depending on region); some using Monte Carlo methods similar to PRAS. PRAS, however, uses consistent simultaneous assessment for all regions for each hour of the simulation. This helps ensure consistency in treatment of both variable renewable and other resources within and between regions. Though there is no national EUE standard in the United States, for reference, the Australian resource adequacy standard was recently changed from 20 ppm to 6 ppm.²⁵

Only 2010 meteorological conditions led to more than one part per million EUE. In particular, an early fall, record-setting heatwave in California in 2010 caused high loads to occur after evening drop-offs in solar output. This led to EUE in the 2050 scenarios for the 2010 meteorological year. The ReEDS model did not see the 2010 meteorological year in its decision-making (only 2012), but PRAS simulates it.

²⁵ "Energy Security Board Interim Reliability Measures – RRO Trigger", <https://energyministers.gov.au/publications/energy-security-board-rro-trigger-rule-change>.

Table 9 shows LOLH statistics in several scenarios, compared to the 2020 NERC LTRA. This method also demonstrates that the NARIS scenarios studied with this model are generally comparable in adequacy to today’s grid. Note that for all comparisons with average values in LTRA, the WECC-CAMX region was excluded because it was an extreme outlier (over one TWh of EUE).

Table 9. Loss of Load Hours (LOLH) by Scenario, Compared to NERC LTRA

Metric	BAU 2024	BAU 2050	Low Cost VG 2050	2020 NERC LTRA (2022 Assessment Year)
Average LOLH of all assessment areas	0.00	0.03	0.05	0.04
Median LOLH of all assessment areas	0.00	0.00	0.00	0.00
Number of areas in “Green” category (below 0.1 LOLH)	13	12	12	10
Number of areas in “Yellow” category (0.1–2.4 LOLH)	0	1	1	2
Number of areas in “Orange” category (>2.4 LOLH)	0	0	0	1

This table has variety of metrics of LOLH from the PRAS modeling compared to 2020 NERC LTRA. All numbers are for U.S. regions only. The modeled BAU 2024 outputs are different (less LOLH) from the NERC assets because the ReEDS model builds additional capacity for regions that are short on capacity. WECC-CAMX was excluded from the average, but not the median or count statistics (which are not sensitive to outliers).

To analyze how large the adequacy buffer is on average in each scenario, we repeated the analysis and uniformly scaled the time series of loads in each region to see how much additional EUE results. If a load increase yields only a small increase in EUE, we conclude that most hours had a nontrivial adequacy buffer; however, if a load increase yielded a large increase in EUE, we conclude the buffer has been exhausted in some hours. This is not standard adequacy modeling practice, but it does help identify how “overbuilt” the system is. There are trade-offs between cost and reliability for customers today and in the future, and these scenarios attempt to build a system that is generally equivalent to today’s grid in adequacy.

For each load multiplier (applied by multiplying a uniform scalar value to every hour, preserving the load shapes), we calculated EUE using 1,000 Monte Carlo samples for each meteorological year (2007–2013) for three scenarios (BAU 2024, BAU 2050, and Low-cost VG 2050). To reduce computational burden and compare all scenarios with four different multipliers, we used fewer Monte Carlo draws than the runs for Table 8 and Table 9. We then averaged the results over the seven meteorological years to trace out the relationship between load multiplier and EUE, particularly looking for the inflection point that identifies the load multiplier for which most hours shift from having a buffer to having no buffer (Figure 19). This analysis showed that all scenarios stayed below 10 ppm EUE with a load multiplier of 1.10 (a 10% increase in load).

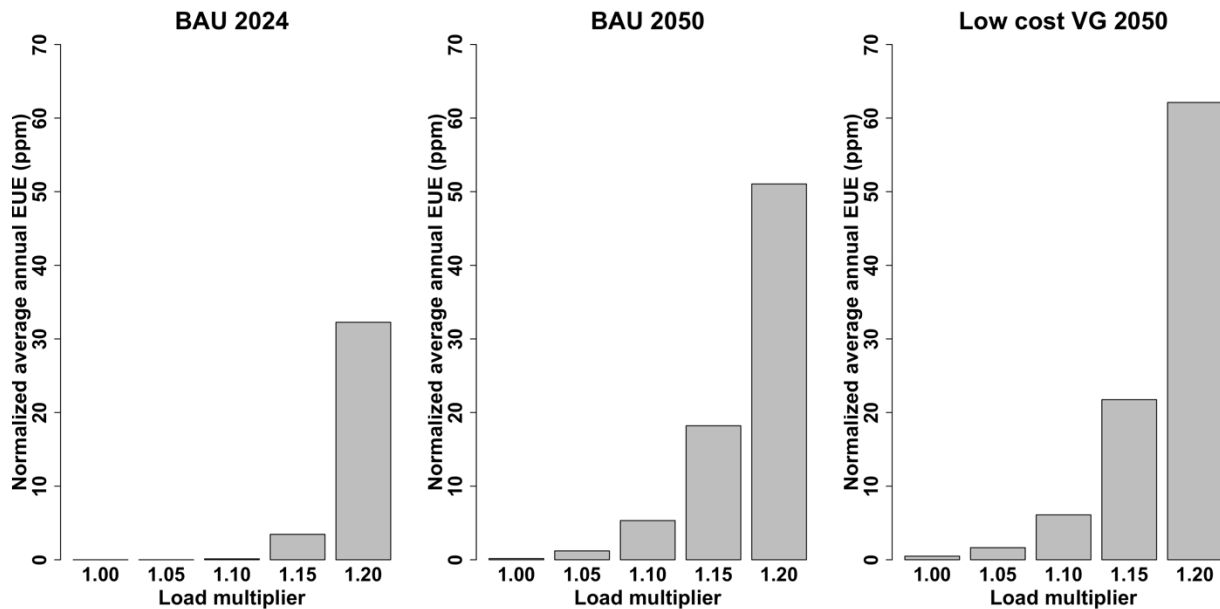


Figure 19. Normalized average aggregate EUE (ppm) by scenario and load multiplier for the United States

Each bar is the average EUE over the 2007–2013 meteorological years. The indicated load multiplier is applied uniformly to each hour of the study year. Note that loads could increase by 10% in these scenarios and still maintain EUE below 10 ppm.

The key caveats regarding the findings of resource adequacy include:

- PRAS assumes zonal transmission simplifications (in line with industry standard for adequacy models).
- As an adequacy model, PRAS does not consider unit commitment or forecast errors—only whether capacity is sufficient to serve the load in each region at each simulated hour (which is also in line with industry standard for models like PRAS).

3.2.2 All generation types can contribute to reliability in future scenarios.

Figure 20 (page 43) shows the contribution of technologies to energy and capacity adequacy (both summer and winter) based on the ReEDS modeling outcomes. For wind and solar, ReEDS considers the coincidence between hourly generation patterns and load in each region. PRAS provides additional evidence that these results produce an adequate system, subject to the caveats above.

For the United States, hydropower provides a similar contribution to energy and adequacy, and it varies greatly by region. Although hydropower energy limits are lower in late summer (when load is still high), the capacity is still available. Wind provides more energy than adequacy because on average, the wind generates less in peak load hours. Wind generation is more coincident with winter peaks than summer peaks. Solar provides similar contribution to both summer planning reserve and energy. Although solar is very well correlated with summer peak loads, additional contributions from solar eventually shift the net load peak to approximately sunset in many regions. Solar is poorly correlated with winter peak loads, as these often occur in dark hours. Thermal generators provide less energy, but significant adequacy to the grid in both

seasons (see Section 3.2.3 for a discussion of thermal generator operation). This is because these generators have nonzero marginal cost, and many are primarily providing adequacy and dispatched after the zero-marginal-cost renewable sources. Section 3.2.3 has a discussion of thermal generators operational patterns. The storage category is a combination of pumped-storage hydropower and batteries with 4-hour duration. Recent work by Frazier et al. (2020) characterized impacts on storage duration on planning reserves for a variety of scenarios and modeled most of the additional storage resources as 2-hour and 4-hour batteries. At higher levels of renewable generation (and storage deployment), longer-duration storage becomes more important.

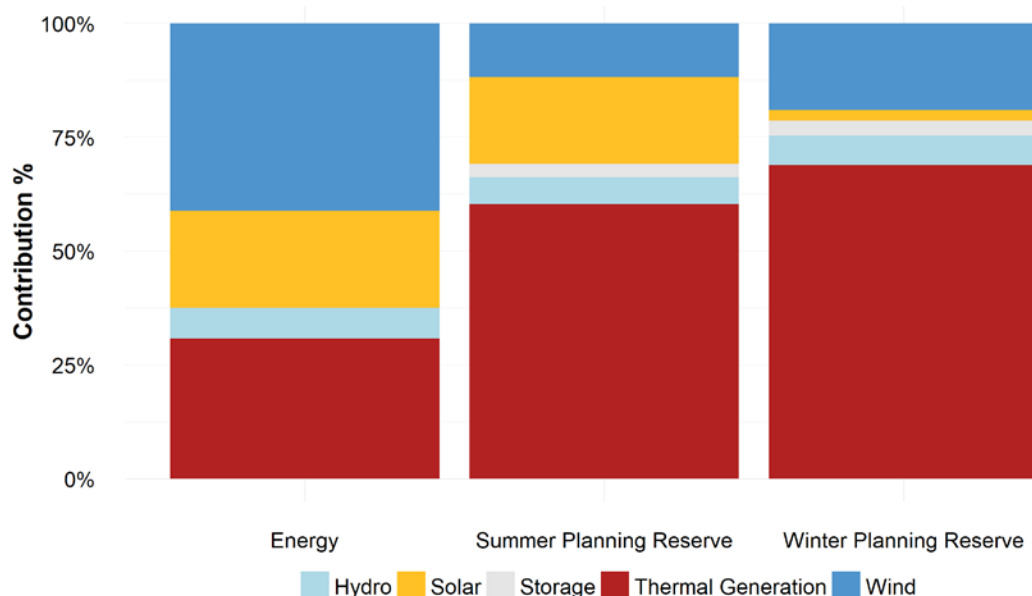


Figure 20. U.S. contribution of different technologies to energy and planning reserve in the Low Cost VG scenario

The energy and planning reserve requirements are all different, so this plot shows the ratio for comparison between technologies. Though hydropower provides similar energy and planning reserves, wind provides more energy than planning reserves, and thermal generation provides more planning reserves than energy.

Figure 21 through Figure 23 show the energy generation and planning reserve procurement (including exchange of energy and capacity) by region. In general, the regions showed similar patterns between energy and planning reserves. Regions where the energy or planning reserves are higher than the dashed line represent regions where power or capacity is being exported, and regions lower than the dashed line are importing. Importing capacity represents transfers similar to those counted by NERC in the LTRA as “net firm capacity transfers” toward resource adequacy. They also represent physical transfers of resources that are owned or operated by a balancing authority in one region but physically exist in another. The ReEDS model does not distinguish between these two categories and does ensure the physical deliverability (with zonal transmission representation) of both energy and capacity. The energy plot in Figure 21 represents the annual total, snapshots in time can look significantly different. See Section 3.3.2 for a discussion of powerflow in the PLEXOS modeling for this scenario.

The U.S. portions of WECC outside the California Independent System Operator (CAISO) area (abbreviated in the plot below as WECC) on average send both energy and planning reserve into CAISO. CAISO imports energy and capacity in the model in 2050, which is similar to today's conditions. See Section 3.3.2 for a discussion of CAISO energy imports from the PLEXOS model results. Summer peak capacity imports in the ReEDS model in 2050 (21 GW) are in line with the contribution of imports toward resource adequacy in 2020 (16 GW).²⁶ The summer planning reserve need in the United States (Figure 23) is significantly greater than the winter planning reserve need (Figure 23) for most regions. This allows the United States to send capacity to Canada in the winter and procure capacity from Canada in the summer. On average, Canada also sends energy to the United States in this scenario (70 TWh in the ReEDS model).

Although these plots show the Low Cost VG scenario, the other scenarios (except electrification, which has more wind and solar generation) have generally similar breakdowns by technology (with lower renewable contributions in the BAU).

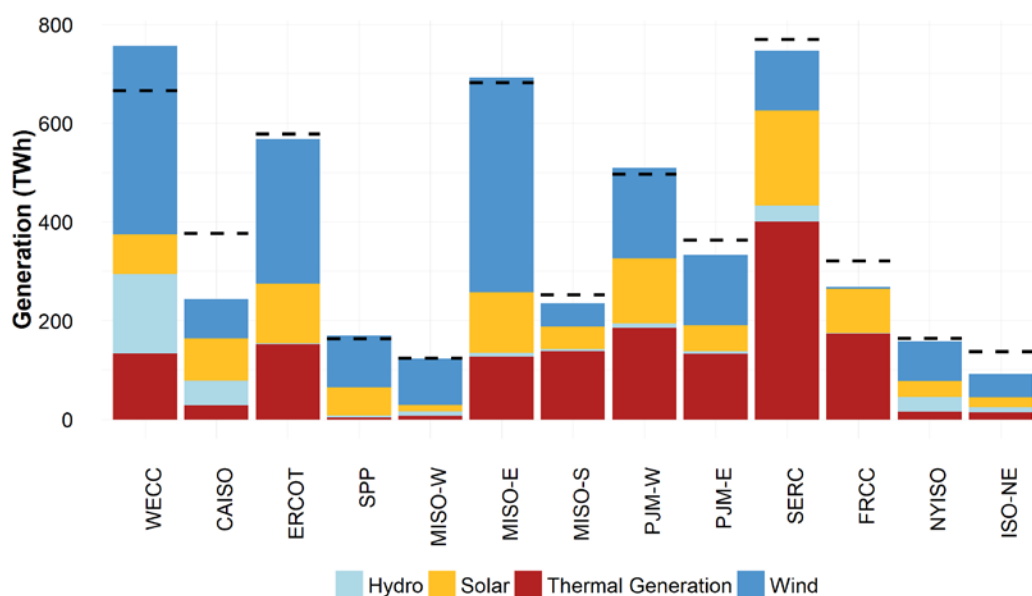


Figure 21. Energy generation in the Low Cost VG scenario in 2050

The dashed lines represent the electricity demand for each region (including losses). The region labeled WECC includes all U.S. portions of WECC, excluding CAISO. This is a ReEDS model result.

²⁶ The maximum import capability toward resource adequacy in CAISO for 2020 is available at <https://www.caiso.com/Documents/ISOMaximumResourceAdequacyImportCapabilityforYear2020.pdf> ("California ISO Maximum RA Import Capability for year 2020," CAISO).

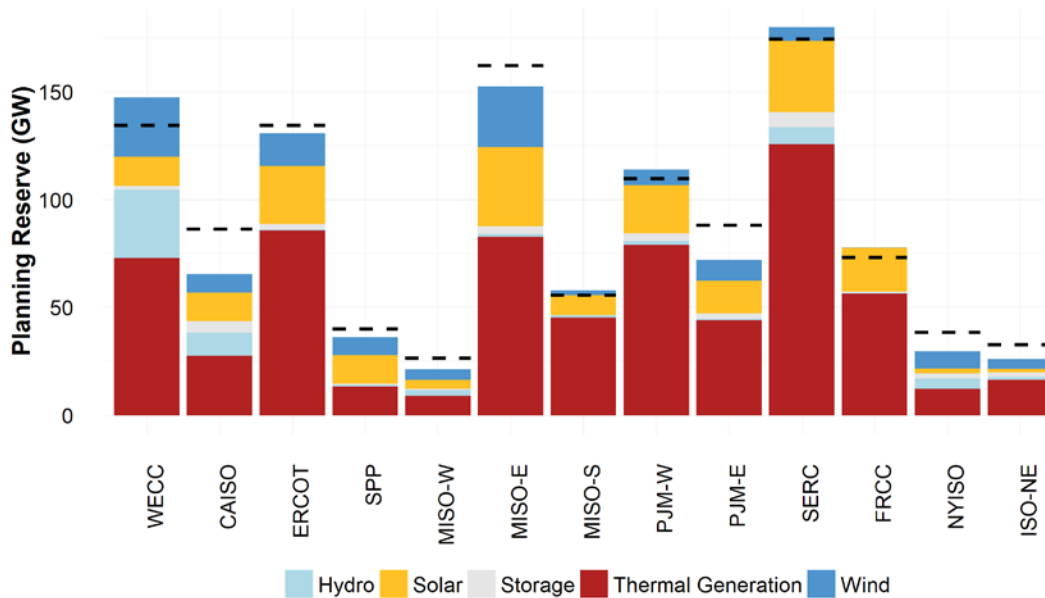


Figure 22. Summer planning reserve in the Low Cost VG scenario

The dashed lines represent the planning reserve requirement for each region. The bars represent the contribution of each resource type to the planning reserve requirement. If the bars are above the dashed line, the excess can be exported to regions that need additional planning reserves. This is comparable to the net firm capacity transfers NERC includes in the LTRA. This is a ReEDS model result.

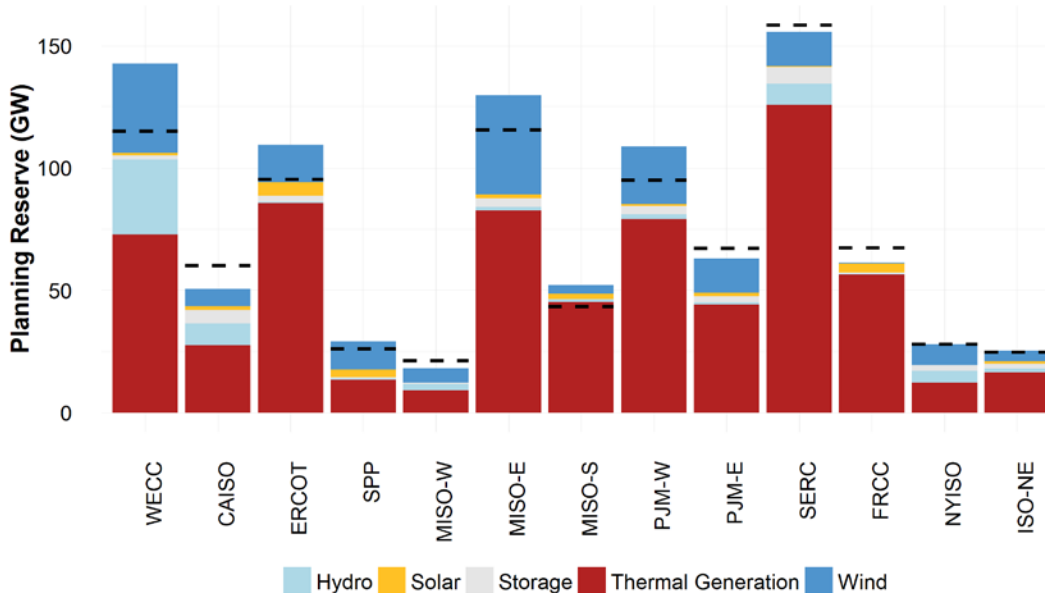


Figure 23. Winter planning reserve in the Low Cost VG scenario

The dashed lines represent the planning reserve requirement for each region. The bars represent the contribution of each resource type to the planning reserve requirement. If the bars are above the dashed line, the excess can be exported to regions that need additional planning reserves. This is comparable to the net firm capacity transfers NERC includes in the LTRA.

Note that shifting demand patterns that are due to climate change were not in the scope of NARIS; this impact could lead to changing summer and winter peak demand requirements across North America, driven by electric heat and air conditioning.

Figure 24 shows the evolution of summer planning reserve needs in the United States through 2050 (the dashed line), along with the renewable and storage contributions to the planning reserve need (the colored lines). Planning reserve need grows by approximately 22% relative to 2020, and the additional planning reserve is met almost entirely by additional renewable generation in all scenarios. The contribution of thermal generation remains similar to 2020. In the scenario with low-cost storage, storage also plays a significant role (over 200 GW) and thermal generation plays a smaller role.

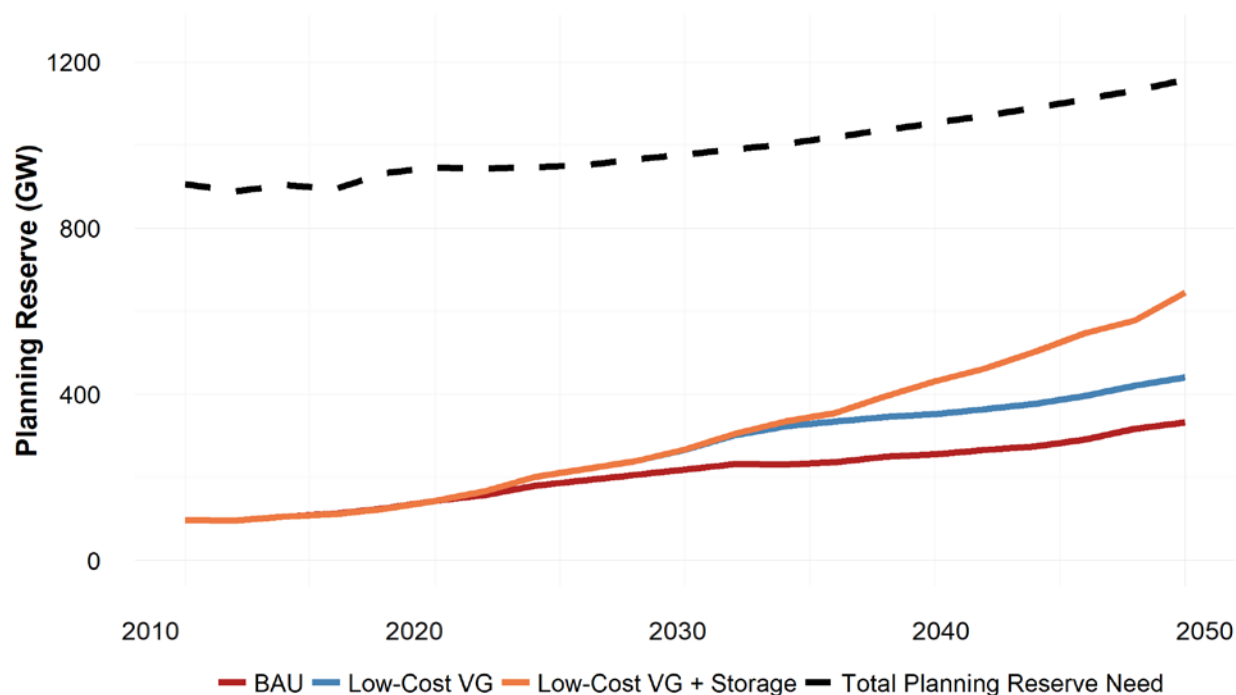


Figure 24. Contribution of renewable generators to summer planning reserve needs in the United States

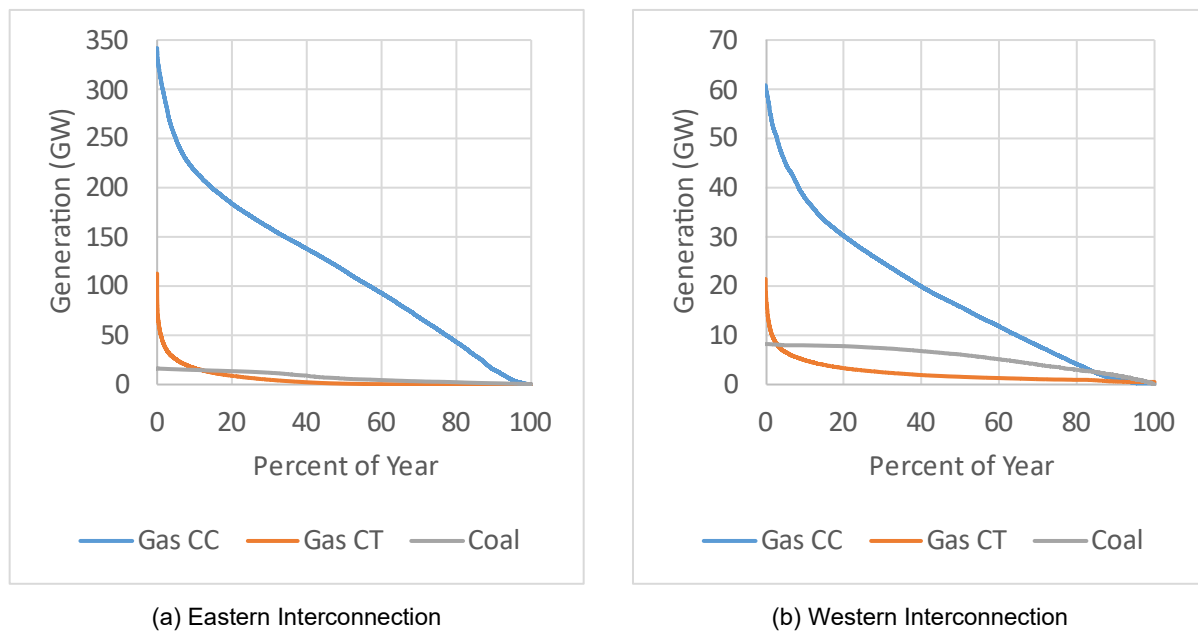
Capacity contribution to planning reserves from renewables grows in all scenarios in the ReEDS model. Most of the rising peak demand (dashed line) is provided by the capacity credit from new wind and solar. Thermal capacity continues to play a role in resource adequacy to fill the remaining firm capacity needs (the gap between the requirement and the contribution from renewables and storage in each scenario). The Low Cost Storage scenario demonstrates that storage could play a major role in planning reserve contributions in the future.

3.2.3 Thermal generation operates differently in future scenarios and provides more adequacy than energy.

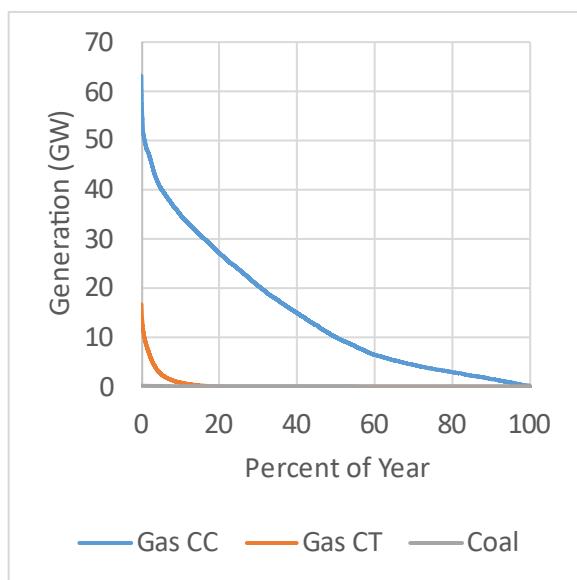
Though thermal generation serves a smaller portion of energy needs, it is important in the NARIS scenarios for both energy and adequacy. If other scenarios or sets of assumptions were considered (e.g., technology costs or lower carbon limits), storage or hydropower could potentially fill more of that role. During a small number of hours of the year, thermal generators are producing most of the power to the grid because load is high and/or wind and solar

generation are low. The thermal generators are helping provide adequacy during those key hours. For many of the rest of the hours of the year, the low-marginal-cost resources (wind, solar, hydropower) are providing most of the energy.

Figure 25 shows the duration curve of gas CC and gas CT generation in the three interconnections resulting from the PLEXOS Low Cost VG 2050 scenario. Gas CTs are used primarily for adequacy in all three interconnections, seen by the high utilization exclusively in a few hours of the year at the left edge of the plot. Average capacity factors range from 2% (Eastern Interconnection) to 10% (Western Interconnection), comparable to a U.S. average of 11% in 2019.²⁷ Gas CCs have significant utilization in more hours of the year but still see capacity factors of 18%–31%, which is substantially lower than the 2019 average of 57% in the United States. Most coal capacity has retired by 2050 in this scenario, but without any carbon constraints (in the United States), the existing coal does have significant capacity factors (48% in the Eastern Interconnection and 62% in the Western Interconnection, with Texas having negligible coal capacity). This is comparable to the 2019 average of 48%. Nuclear generation patterns are not presented here because nuclear is assumed to be online and generating at maximum capacity whenever they are not on outage in the model. The modeling respects minimum generation levels for each generator at each 5-min operating interval. At times, little or no fossil-fueled generators are online. It is assumed for NARIS that frequency support can be provided by nuclear, hydropower, synchronous condensers, and/or advanced inverters; if additional thermal generation is required for frequency support, this would increase curtailment.



²⁷ Capacity factors reported for 2019 are from “Electric Power Monthly,” EIA, November 2020, <https://www.eia.gov/electricity/monthly/>.



(c) Texas Interconnection

Figure 25. Thermal generation utilization in Low Cost VG scenario in 2050 by interconnection

Figure 26 through Figure 28 summarize the capacity factor of all the plants in the United States in the Low-Cost VG scenario. Most gas CTs have a capacity factor between 0% and 5%. Also, a significant number of gas CC generators have capacity factors near zero, especially in the Eastern Interconnection and the Texas Interconnection.

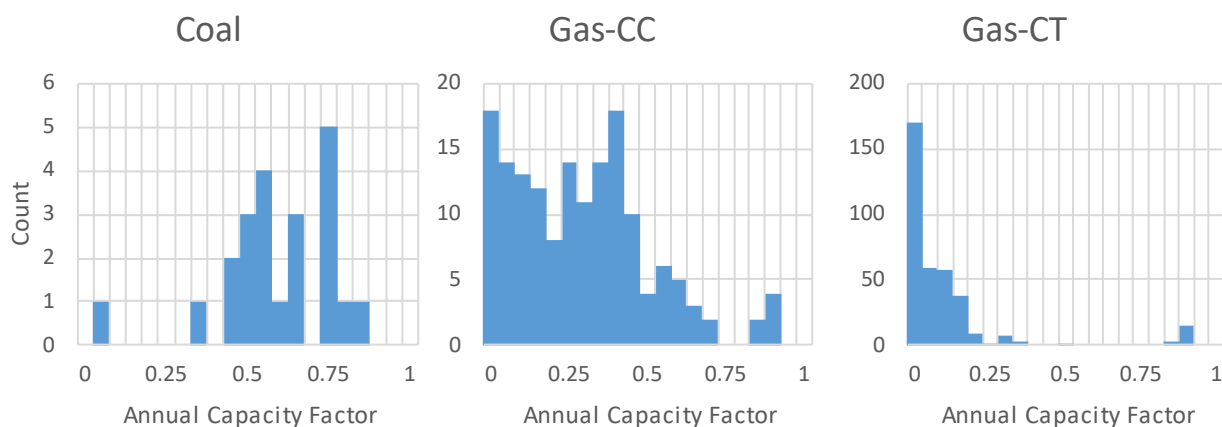


Figure 26. Thermal generation utilization in the U.S. Western Interconnection (Low Cost VG 2050)

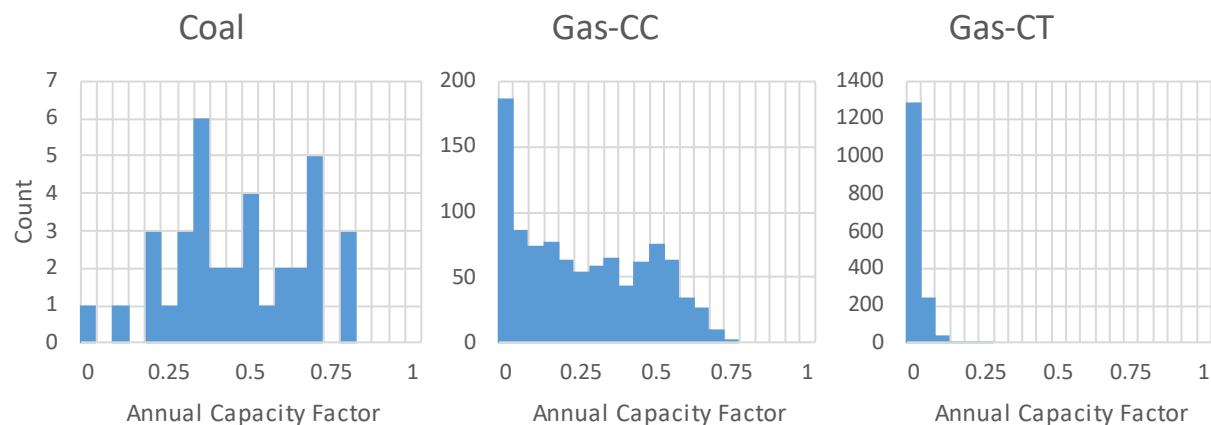


Figure 27. Thermal generation utilization in the U.S. Eastern Interconnection (Low Cost VG 2050)

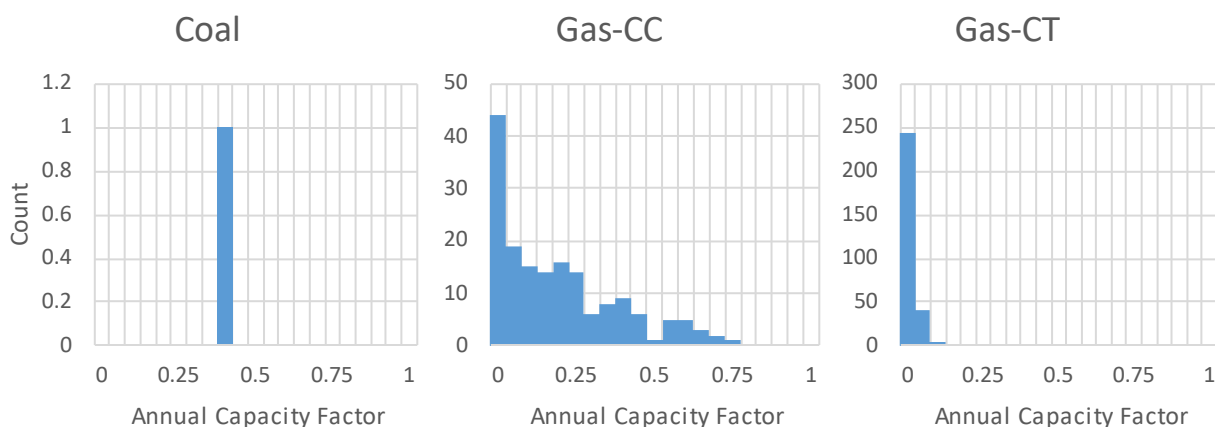


Figure 28. Thermal generation utilization in the Texas Interconnection (Low Cost VG 2050)

Although thermal generators produced less energy in these scenarios than they currently produce, they still have a major role to play in adequacy for the future system studied in these scenarios. Scenarios with higher contributions of wind, solar, and other zero-carbon resources might rely more on storage and demand response and less on coal and gas generation for adequacy. In NARIS, we did not attempt to analyze whether there would be sufficient revenues for these generators to continue operations. Some compensation method (whether based in energy markets, capacity markets, or regulations) would have to exist for these generators to be available. The cost of building these units, however, was considered in the capacity expansion modeling as part of the overall cost optimization.

3.3 Transmission

In this section, we discuss some of the transmission-related outcomes of the modeling. In Section 3.3.1, we discuss the value of transmission and results from ReEDS and PRAS, and in Section 3.3.2 we discuss utilization and the results from the PLEXOS modeling.

3.3.1 Cooperation and transmission between regions and countries leads to economic and adequacy benefits.

Figure 29 shows transmission investments by scenario, broken out by whether the additional capacity crosses the Canada-U.S. and Mexico-U.S. borders. From this result, we see that transmission capacity increases with wind and solar contribution. The CO₂ Constrained scenario leads to higher transmission investment than the Low Cost VG scenario (despite similar VG contributions) because VG technologies have higher costs in the CO₂ Constrained scenario, thus shifting the optimal balance between transmission and VG investment. As a result, VG is sited at more-optimal locations in the CO₂ Constrained scenario (possibly requiring more transmission), whereas VG can be sited at less-optimal locations closer to load centers in the Low Cost VG scenario. Although the international transmission connections look small in comparison to the increased capacity within the United States, the international expansion is also significant (3–8 GW expansion U.S.-Mexico, 10–20 GW U.S.-Canada).²⁸

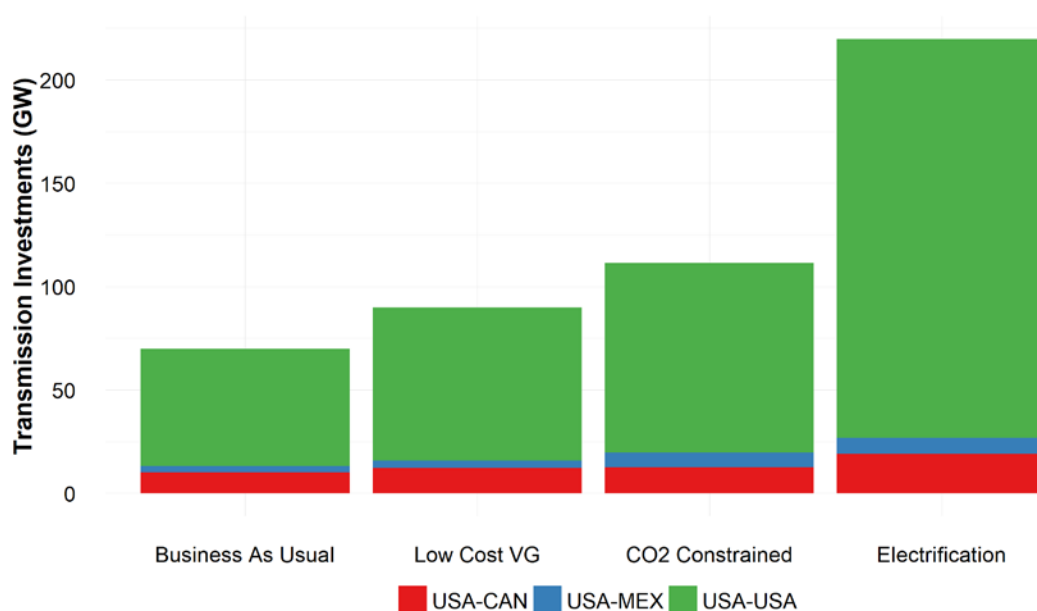


Figure 29 Added transmission capacity in the core scenarios (measured in GW of interface expansion)

Figure 30 shows a map of the transmission expansion in the core scenarios based on the ReEDS generation and transmission co-optimization. In all four cases, the model deploys new transmission infrastructure in regions throughout the United States and North America. Although many of the interfaces are developed in all scenarios, some are developed only in the Electrification scenario, where almost double the new wind capacity is built than in the other scenarios.

²⁸ The expansion values compare to approximately 18 GW of capacity between the United States and Canada in 2020 and 2 GW between the United States and Mexico in 2020, although most of the connection with Mexico does not connect to the interconnection in Mexico (Sistema Eléctrico Nacional).

The transmission expansion in the model is part of a co-optimization of generation and transmission resources. Differences in resource quality or cost assumptions could lead to differences in the optimal build-out of renewable generators and transmission infrastructure both. As seen in Figure 30, however, much of the transmission that is built in the model is robust to a variety of scenarios and the assumptions we varied.

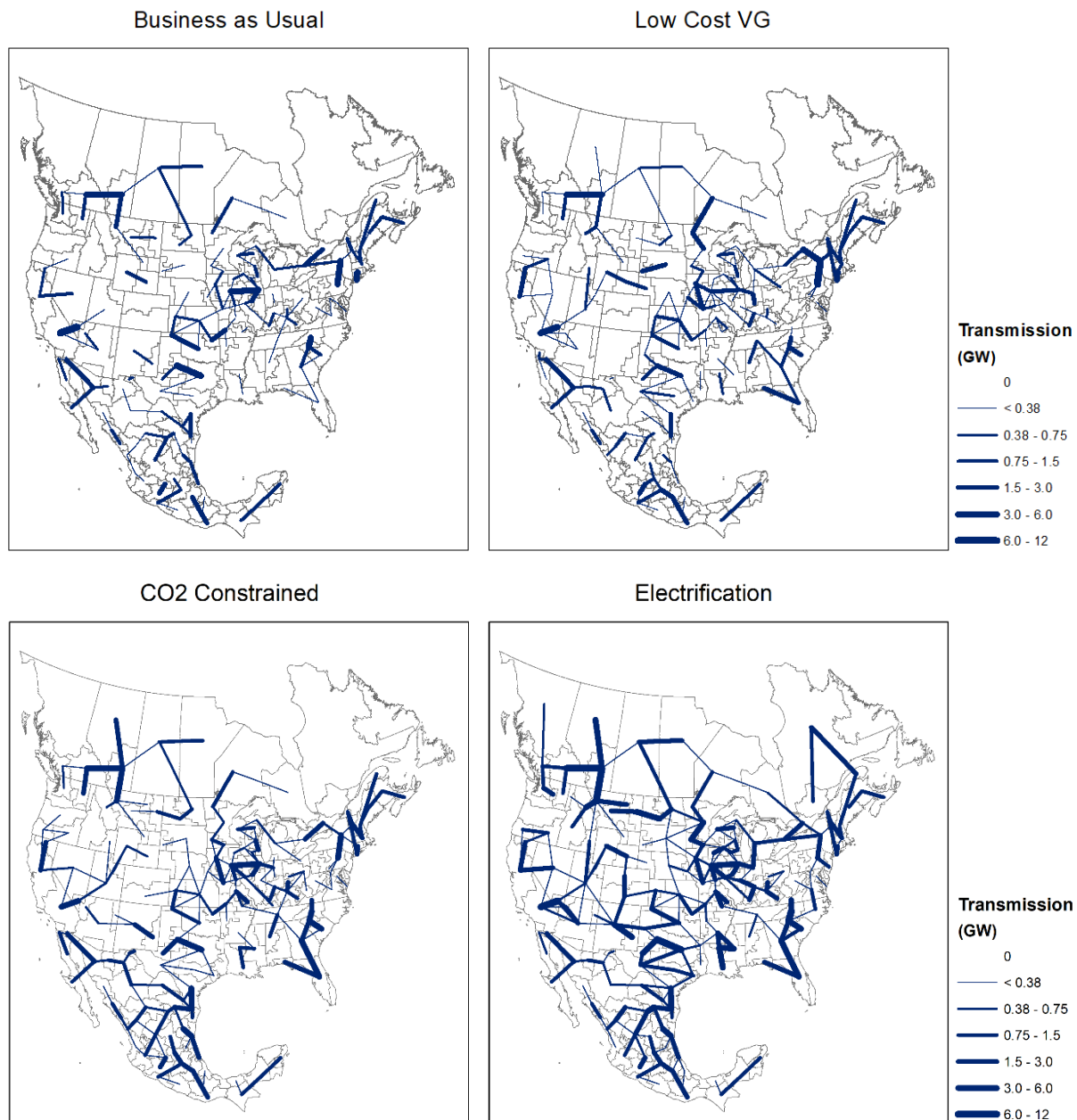


Figure 30. New transmission capacity in the core scenarios

The lines on this map represent transmission interfaces between the zones in the model, and they typically represent aggregated transmission lines.

To understand the importance of this transmission to costs and other outcomes, we ran the ReEDS model with a variety of limitations on transmission expansion. The difference in total system costs between the constrained and unconstrained scenarios demonstrates the value to the system of the changes. We explored the following changes with scenarios (as identified in Section 1.2):

- **International Transmission Expansion:** This comparison estimated the value of allowing new international transmission capacity. It did this by comparing each core scenarios with a corresponding scenario that disallows transmission expansion across national boundaries (core scenario versus No Cross-Border Expansion scenarios in Table 2).
- **Interregional Transmission Expansion and Coordination:** This comparison estimated the value of interregional transmission capacity by comparing a scenario with limited transmission growth and its corresponding core scenario (core scenario versus No Cross-Border Expansion Uncoordinated scenarios in Table 2). The transmission cost increase was included in the optimization but in costs reported here (so that the system costs are directly comparable to the core scenarios) and the scenario represents a very low transmission build-out.
- **Interregional Transmission Expansion and Coordination with Macrogrid:** This compares the core scenarios with a predesigned macrogrid shown in Figure 32 and described later in this section (Macro Grid versus No Cross-Border Expansion Uncoordinated scenarios in Table 2).

Figure 31 shows the value of enabling each of these transmission assumptions in the model (measured as the reduction in overall system costs in ReEDS). The pattern between scenarios is similar to the overall transmission infrastructure build (Figure 29). The net value of international transmission expansion (mostly between Canada and the United States) is \$10 billion–\$30 billion in all the core scenarios except the BAU.²⁹ Benefits of increased transmission infrastructure would also occur after 2050 and those are not captured here; this represents the sum of all benefits from 2020 to 2050 in 2018 USD values. The net value of interregional transmission ranges from \$70 billion to \$180 billion in the core scenarios, with the higher values corresponding with scenarios with more transmission build and higher wind and solar generation levels. The macrogrid scenarios show that requiring the model to build a macrogrid with 2,700-MW HVDC (high-voltage direct current) lines (and allowing additional AC builds) would have overall net value similar to the interregional value when the model optimizes the build (\$60 billion–\$170 billion versus \$70 billion–\$180 billion). Although the net value of the macrogrid is lower than the net value of the optimal interregional expansion in the model in each scenario, benefits from the macrogrid are not well captured in the modeling. The macrogrid benefits that are not fully considered in this modeling include self-contingency, controllability, and dynamic performance benefits.

²⁹ The BAU has nationwide carbon limitations in Canada but only state limitations on carbon in the United States. This could possibly undercut some of the value of transmission expansion, as Canada has limited ability to import anything from the United States in this scenario.

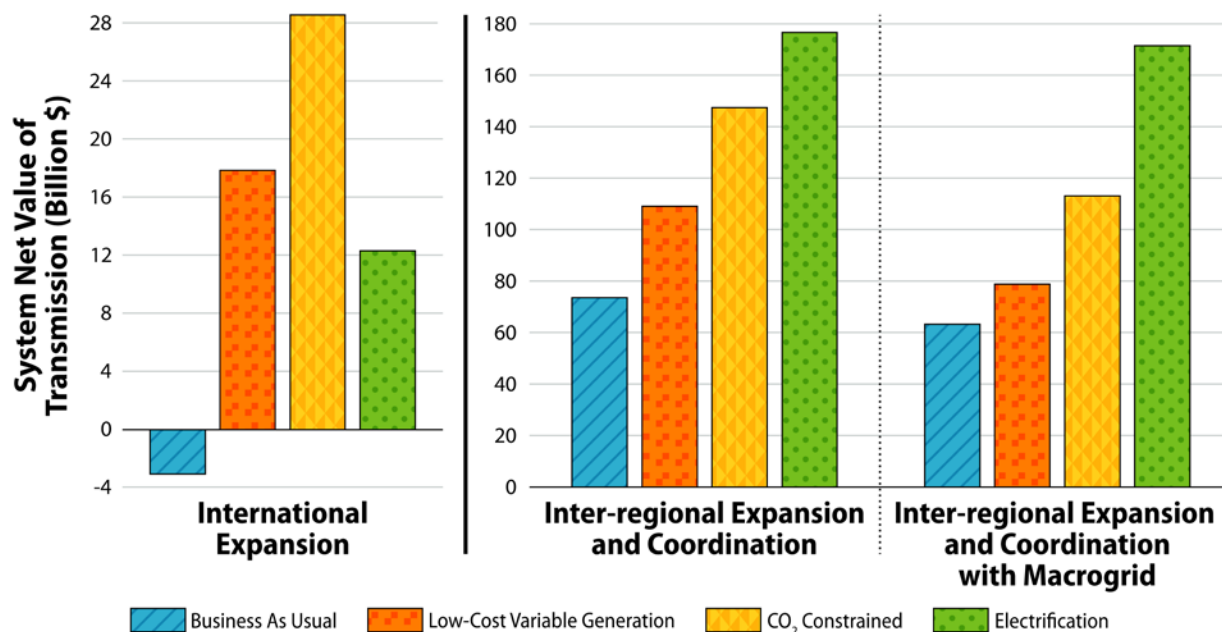


Figure 31. Continent-wide net value of transmission expansion

This plot shows the net value of allowing different transmission build assumptions in the model. It shows international transmission expansion worth \$10 billion–\$30 billion, interregional expansion (with or without a macrogrid) worth \$60 billion–\$180 billion. Note that the macrogrid has additional benefits (e.g., self-contingency and controllability) not fully captured in this modeling.

Figure 32 shows the macrogrid studied in NARIS, which is a predesigned, HVDC network that spans most of the United States and some of Canada. It expands on the work done in the Interconnections Seam Study³⁰ to include a likely high-value branch into Canada, as designed with help from the Technical Review Committee. These model runs might not provide sufficient evidence to conclude that the optimal AC build is better than the HVDC macrogrid (or vice versa), but both scenarios offer more than \$100 billion in savings than an uncoordinated build (with less transmission expansion).

³⁰ “Interconnections Seam Study,” NREL, <https://www.nrel.gov/analysis/seams.html>.

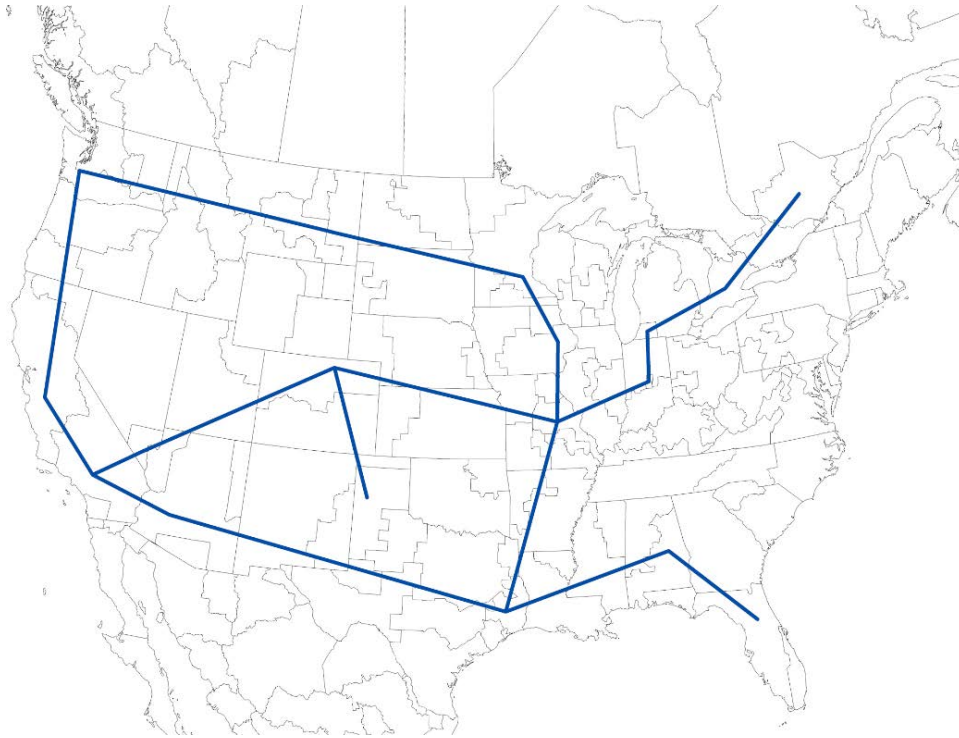


Figure 32. Macrogrid design

Additional macrogrid layouts could be more optimal than this design. Further work could help determine optimal macrogrid layouts for different scenarios, or robust macrogrid layouts.

Figure 33 and Figure 34 show the net and gross trade between the United States and Canada, respectively, through 2050. Net trade between the United States and Canada is highly sensitive to model assumptions, as can be seen from the significant spread. Some scenarios even represent net Canadian imports from the United States. However, the model results are not consistent in suggesting what net Canada exports might look like in 2050. In the NARIS companion report for Canada,³¹ we discuss scenarios we ran that included a significant Canadian net export requirement (100 TWh/year by 2050), and these scenarios were similar in costs to the core scenarios. These specific scenarios are not reflected in the uncertainty bounds of Figure 33.

Gross trade between Canada and the United States (Figure 34) has a more consistent story. Although there is significant spread between the scenarios, it generally increases with continental wind and solar generation levels (which also increase with time). This demonstrates that the importance of energy exchange between the United States and Canada increases in scenarios with higher renewable deployment. In the Low Cost VG scenario, the PLEXOS model showed that despite an average flow between Canada and the United States of 4,700 MW, power flows from the United States to Canada 32% of the time. Assigning the systemwide benefits to a specific region or country is not possible without knowledge of the contracted and/or market prices.

³¹ *The North American Renewable Integration Study: A Canadian Perspective*. See “North American Renewable Integration Study,” NREL, <https://www.nrel.gov/analysis/naris.html>.

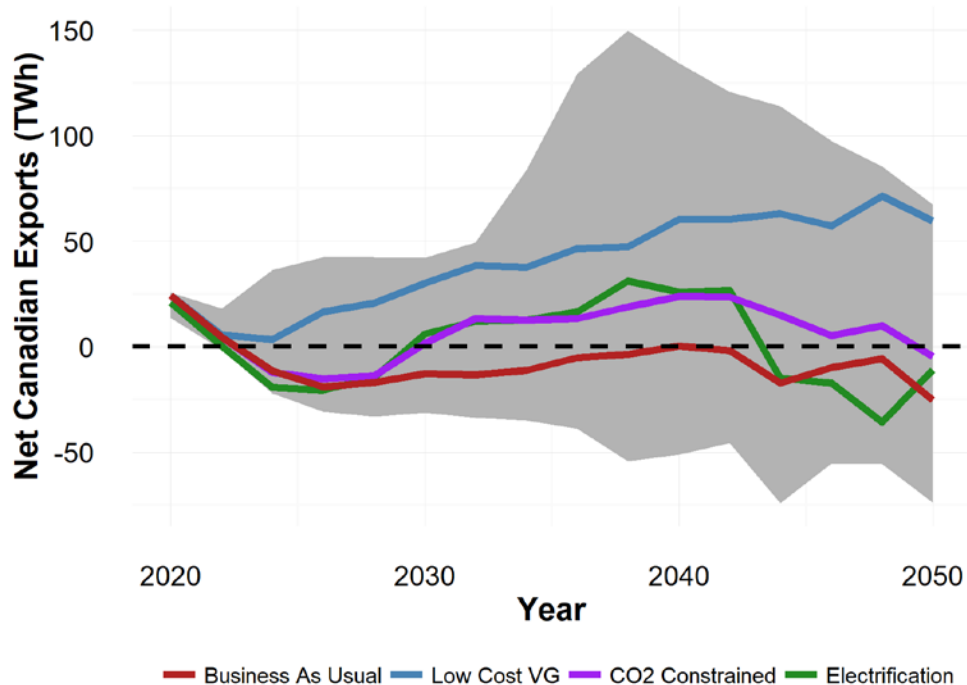


Figure 33. Net United States/Canada trade in all scenarios (core scenarios colored)

The shaded region represents the envelope of all the scenarios that are mentioned in Section 1.2. There is wide variability between the scenarios, and there is no robust conclusion regarding net exports from Canada. In the NARIS Canadian report, we discuss additional scenarios where Canadian exports were required in the model, and these scenarios showed no significant cost increases.

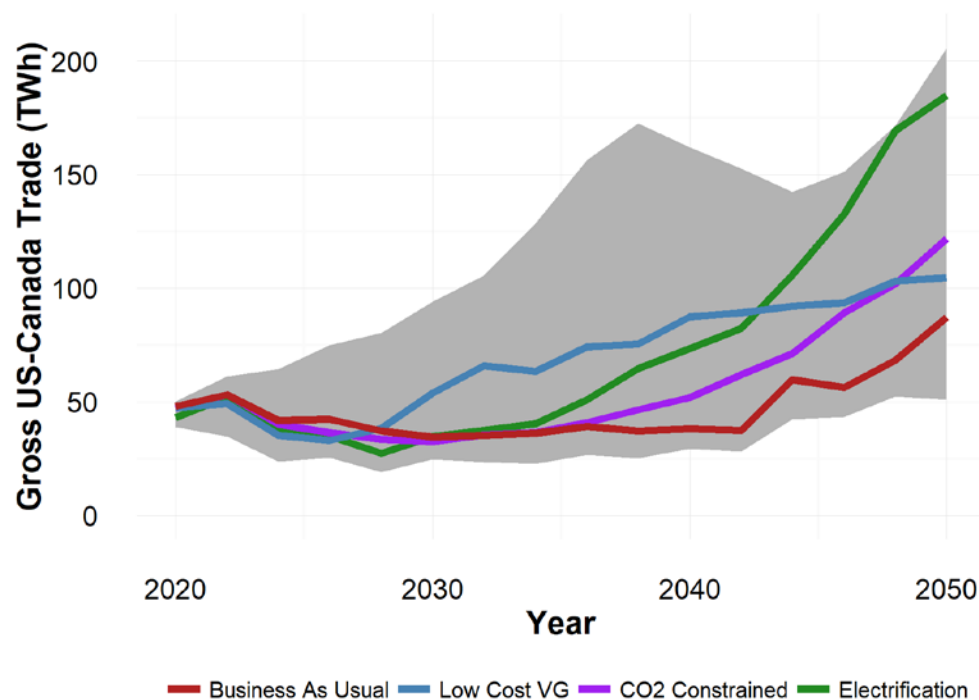


Figure 34. Gross United States/Canada trade in all scenarios (with core scenarios colored)

The shaded region represents all the scenarios that were run for the study, including variations mentioned throughout this report.

Figure 35 and Figure 36 (page 57) show the net and gross trade between the United States and Mexico, respectively, through 2050. Net trade between the United States and Mexico is highly sensitive to model assumptions, as can be seen from the significant spread. However, gross trade between Mexico and the United States (Figure 36, page 57) has a more consistent story. Although there is significant spread between the scenarios, it generally increases in scenarios with carbon constraints in both countries. This demonstrates that the importance of energy exchange between the United States and Mexico increases in scenarios with higher renewable generation levels.

Transmission is needed for adequacy in the near-term grid, and it is even more important with higher loads and higher renewable deployment in 2050. Using the same random Monte Carlo samples that generated the EUE results discussed in Section 3.1, we computed the maximum utilization of each modeled transmission interface for each scenario in each meteorological year. Maps of these results are presented for selected scenarios in Figure 37 (BAU 2024 with 2010 meteorology) and Figure 38 (Low Cost VG 2050 with 2010 meteorology). The results are highly consistent across meteorological years (not shown here). Maximum utilization increases in the 2050 scenarios from the 2024 scenario, particularly in the Low Cost VG case. Note that as a resource adequacy model, PRAS only utilizes transmission when it is required to avoid unserved load, so the utilization maps indicate transmission requirements for adequacy rather than realistic powerflow. For the rest of the analysis in this section, economic exchanges were considered at every time-step in the modeling.

Though NARIS does demonstrate the value of cooperation and transmission, it does not demonstrate that it is impossible to achieve renewable contribution levels or reliable future grids without extensive new transmission builds. Those scenarios, if feasible, would come at a higher cost.

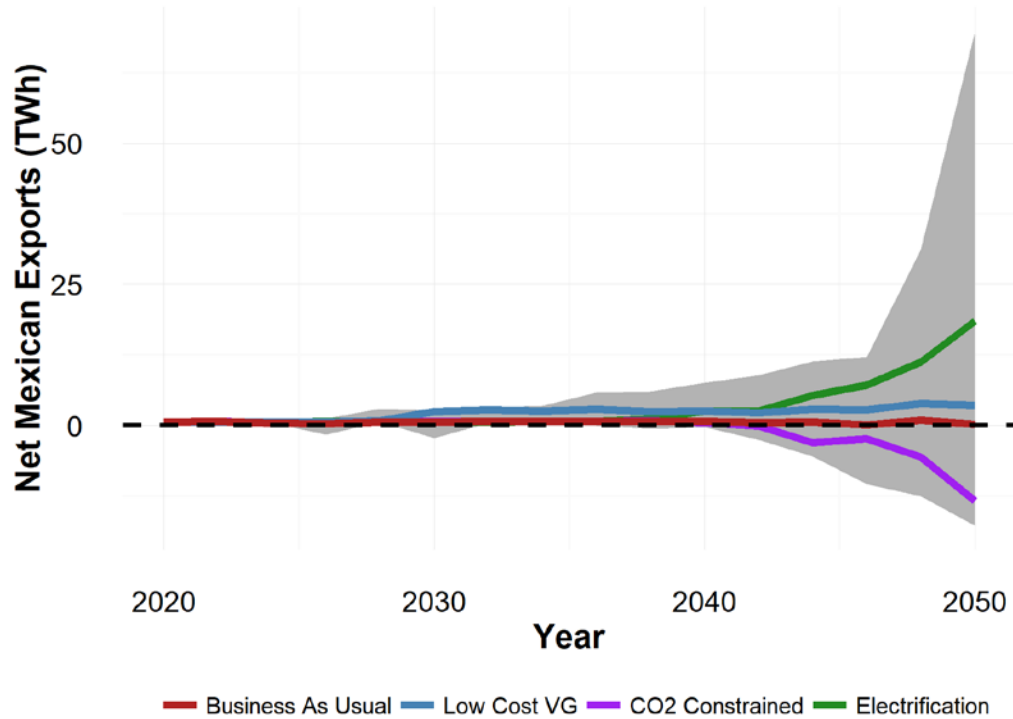


Figure 35 Net U.S./Mexico trade in all scenarios (with core scenarios colored)

The shaded region represents all the scenarios that were run for the study, including variations mentioned throughout this report.

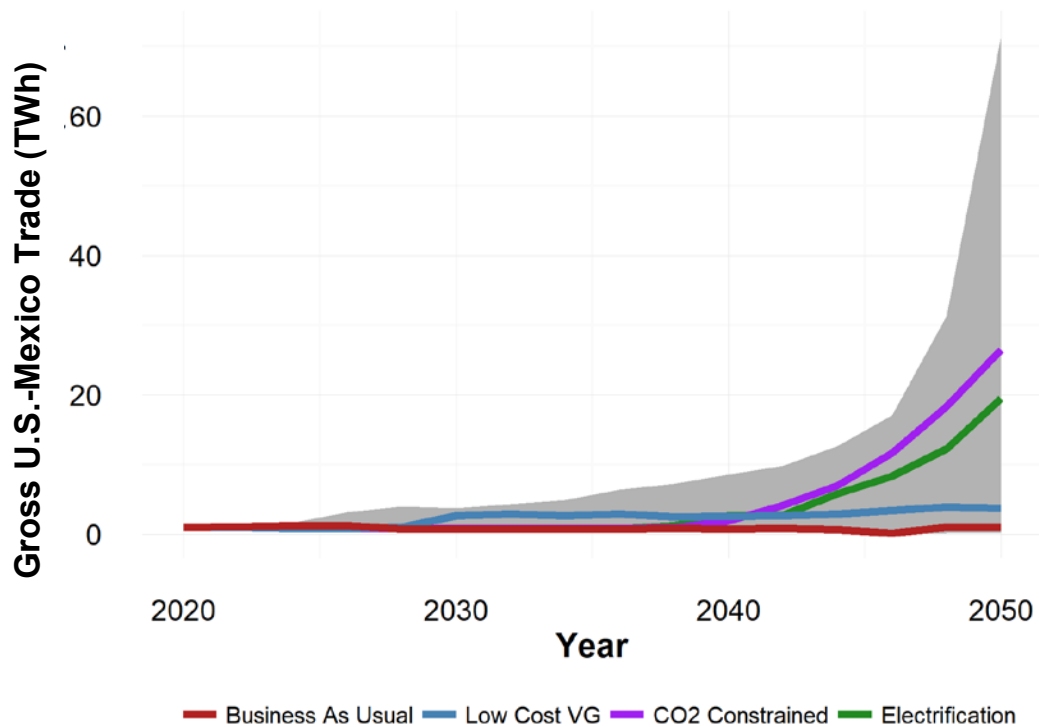


Figure 36 Gross U.S./Mexico trade in all scenarios (with core scenarios colored)

The shaded region represents all the scenarios that were run for the study, including variations mentioned throughout this report.

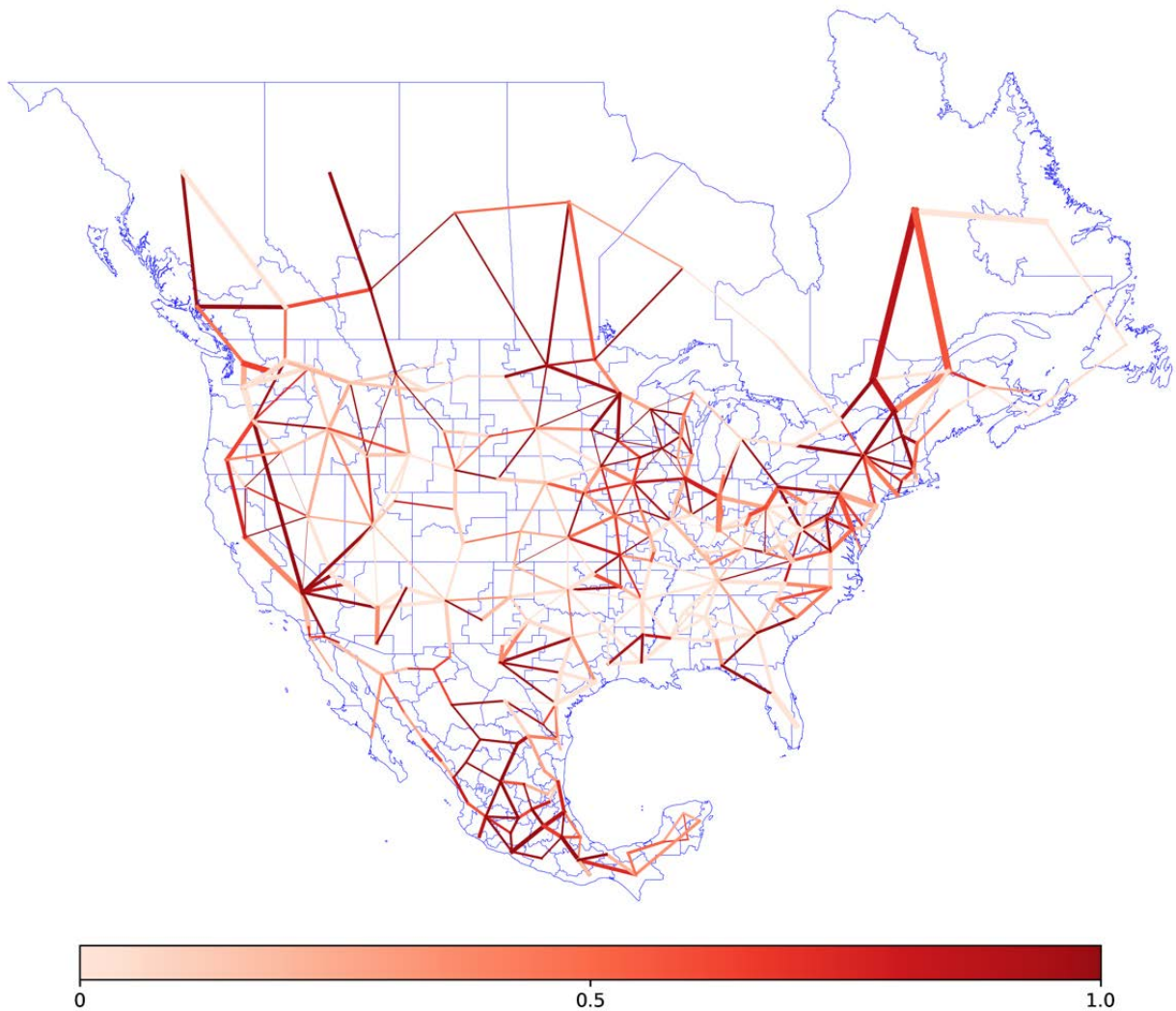


Figure 37. Maximum utilization of paths in the near-term (2024) PRAS adequacy model

The width of the lines represents the capacity of the interface between zones. The color represents the maximum hourly utilization (flow divided by capacity) during the PRAS adequacy analysis for 2010 meteorology; the plot looks similar for other years. This is not an economic dispatch; interfaces are utilized only when it is absolutely needed to serve load.

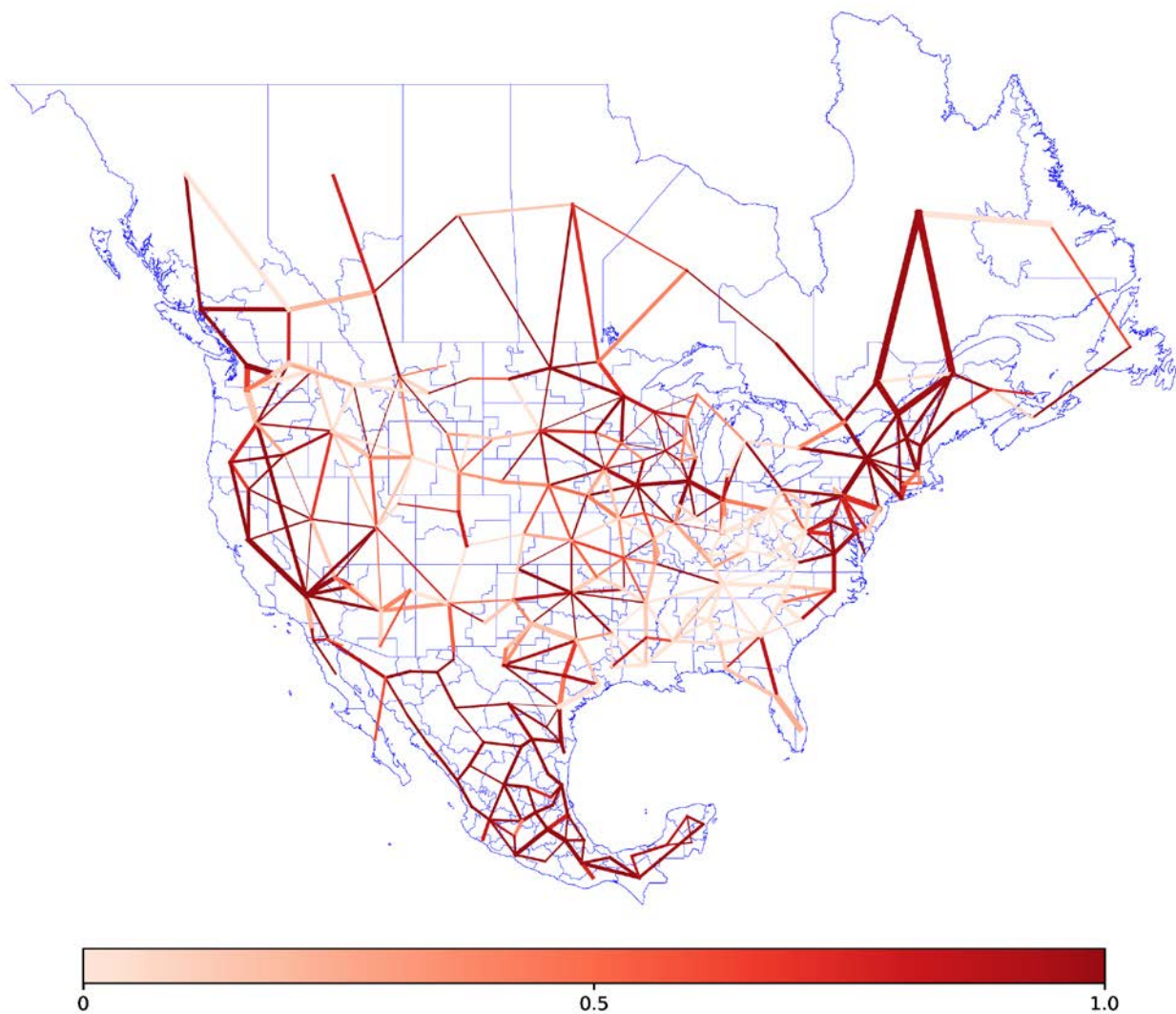


Figure 38. Maximum utilization of paths in the Low Cost VG 2050 scenario in PRAS model

The width of the lines represents the capacity of the interface between zones. The color represents the maximum hourly utilization (flow divided by capacity) during the PRAS adequacy analysis for 2010 meteorology. This is not an economic dispatch; interfaces are utilized only when it is absolutely needed to serve load.

3.3.2 Utilization of transmission infrastructure is very high.

This section describes the utilization of the newly built transmission lines and the interfaces between regions. Figure 39 shows the utilization of lines built by the ReEDS model in the Low Cost VG 2050 scenario. Most lines have annual utilization greater than 90%, demonstrating the high value of the expanded transmission pathways in the Low Cost VG scenario. These lines are operated as DC lines in the PLEXOS modeling, which allows the model to reach higher levels of utilization than AC (see Section 2.1.3 for a discussion of the overall impact). The utilization rates are very high and are often used bidirectionally.

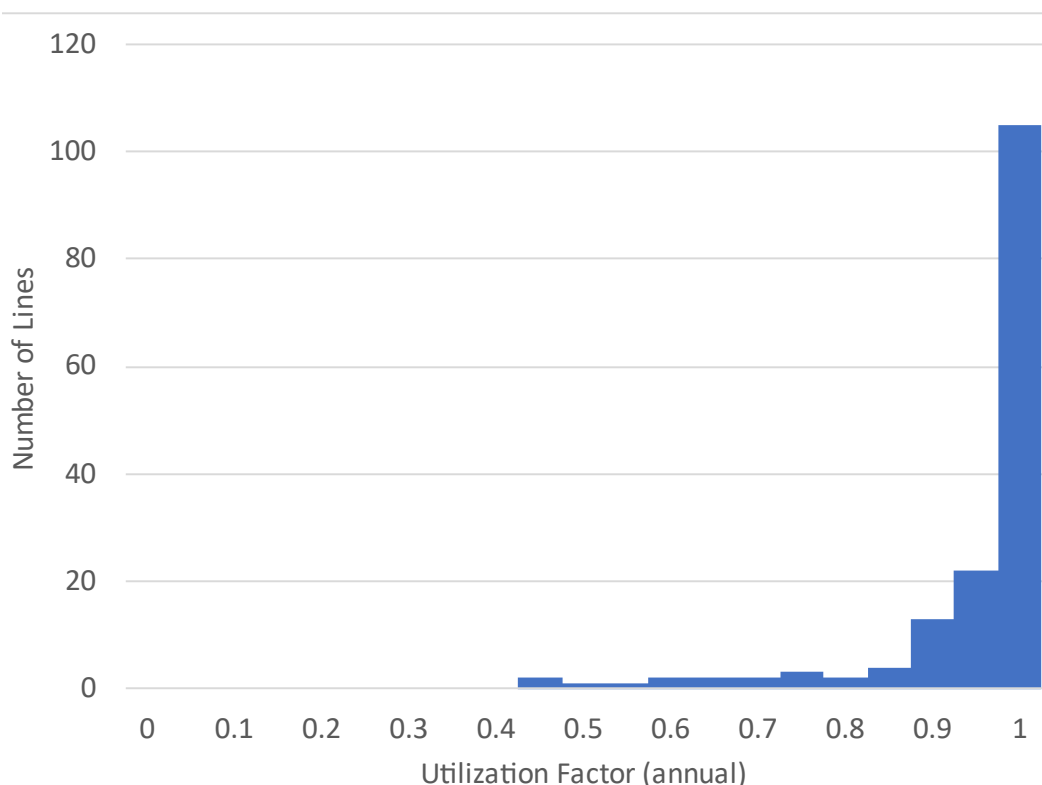


Figure 39. Histogram of total utilization of expansion lines (Low Cost VG 2050)

Figure 40 shows the net interchange between U.S. regions and their neighbors. The biggest net exchanges are from U.S. Southwest to California, the U.S. Northwest to California, the Midcontinent Independent System Operator (MISO) area to the PJM Interconnection (PJM) area, and British Columbia to the U.S. Northwest. Similar to today, California is the largest importer. The total imports into California in the model (95 TWh) are in line with recent years.³² Flows from Quebec into the United States are split onto two different interfaces, yet both are significant. The MISO export to PJM is also substantial, which is likely due to the high-quality wind resources in MISO and strong transmission connections with PJM. Many other interfaces have smaller net flows; some of these have large flows in each direction that balance out over the year.

³² EIA data show California imported 71 TWh in 2019, down from an annual average of 89 TWh for 2013–2017.

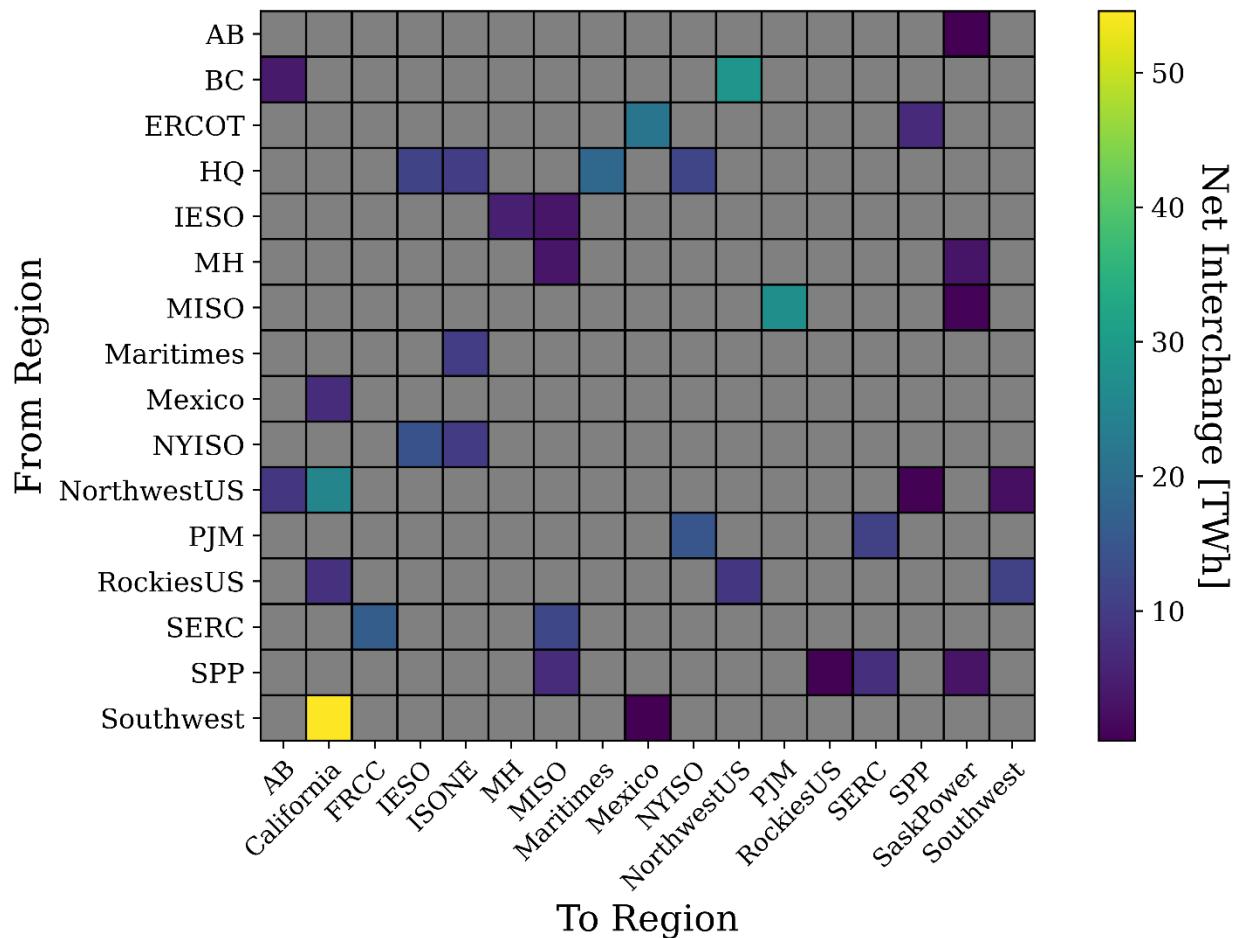


Figure 40. Net interchange between regions and their neighbors over the year (Low Cost VG 2050)

A gray box indicates there is not a connection between the regions (or power is flowing the opposite direction in net).

AB = Alberta
 BC = British Columbia
 FRCC = Florida Reliability Coordinating Council
 HQ = Hydro Quebec
 IESO = Independent Electricity System Operator
 ISONE = ISO New England
 MH = Manitoba Hydro
 NYISO = New York Independent System Operator
 SPP = Southwest Power Pool

Figure 41 shows the gross interchange patterns between regions. Though many interfaces stand out in both Figure 40 and Figure 41, there are some differences in the figures. Though it is the largest net flow, the flow from the Southwest U.S. to California is not the most significant interface for gross flows, because it flows primarily one way. Other interfaces (particularly between large regions like MISO, SERC, and PJM) flow both directions frequently, and these are more noticeable in gross flow compared to net flow. Gross interchanges are also much larger than net interchanges because of the bidirectional flow on most interfaces, including the MISO/PJM interface. See Figure 42 (page 63) for details about the time series.

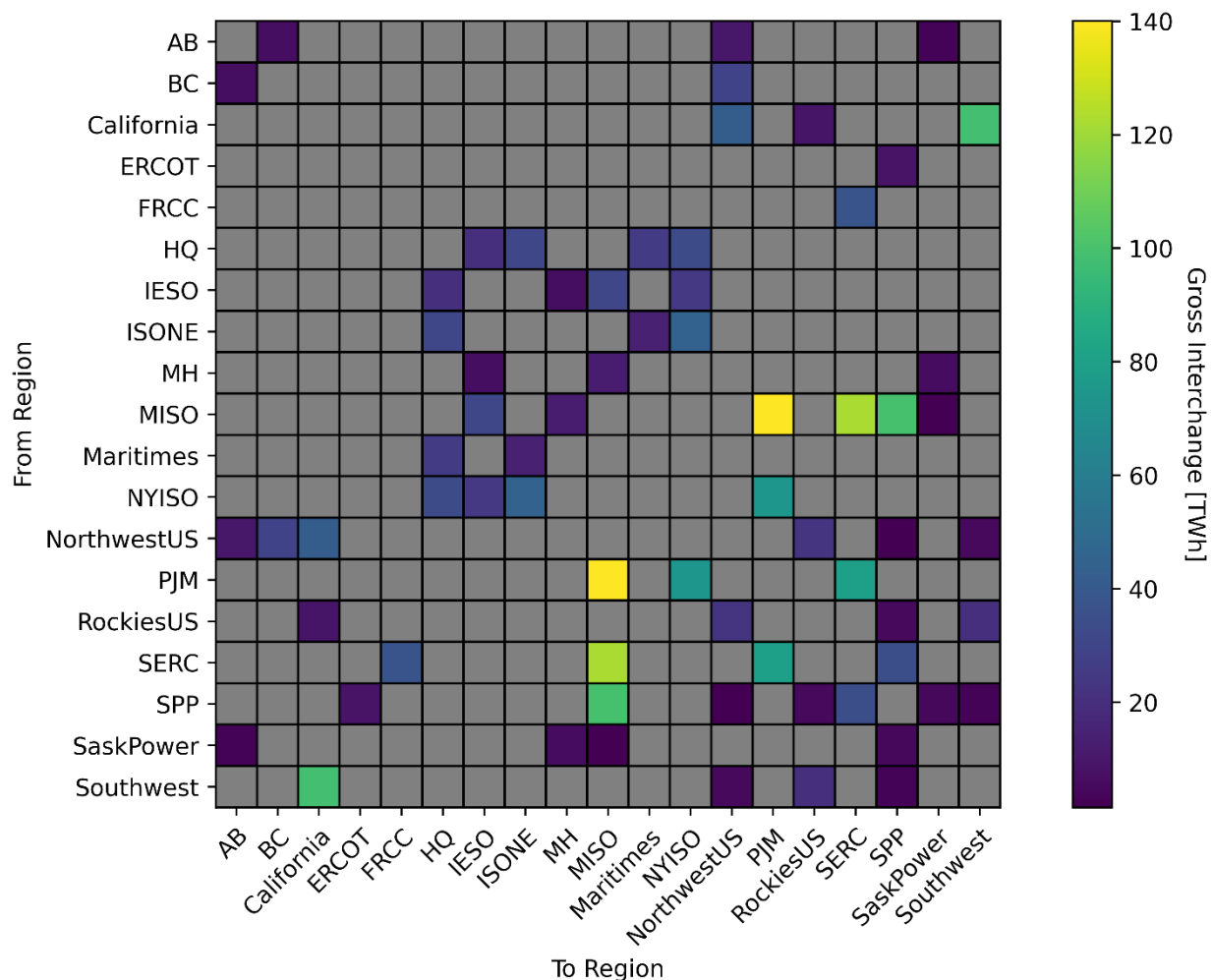


Figure 41. Gross interchange between regions and their neighbors over the year (Low Cost VG 2050)

Figure 42 shows the duration curve of the flow along major transmission interfaces (including both existing transmission and new builds). Flexibly operating transmission interfaces is useful in these scenarios. Many key interfaces have bidirectional utilization, meaning regions can benefit from cooperation by selling or buying power when the economics (and/or adequacy) are favorable. The PJM-NYISO (New York Independent System Operator) interface is expanded in the capacity expansion model, and the lines are used heavily in both directions. It does not have major net flows (Figure 40) but is heavily used in many hours of the year (Figure 42). In this plot, only the British Columbia to Northwest U.S. interface is used primarily in a single direction.

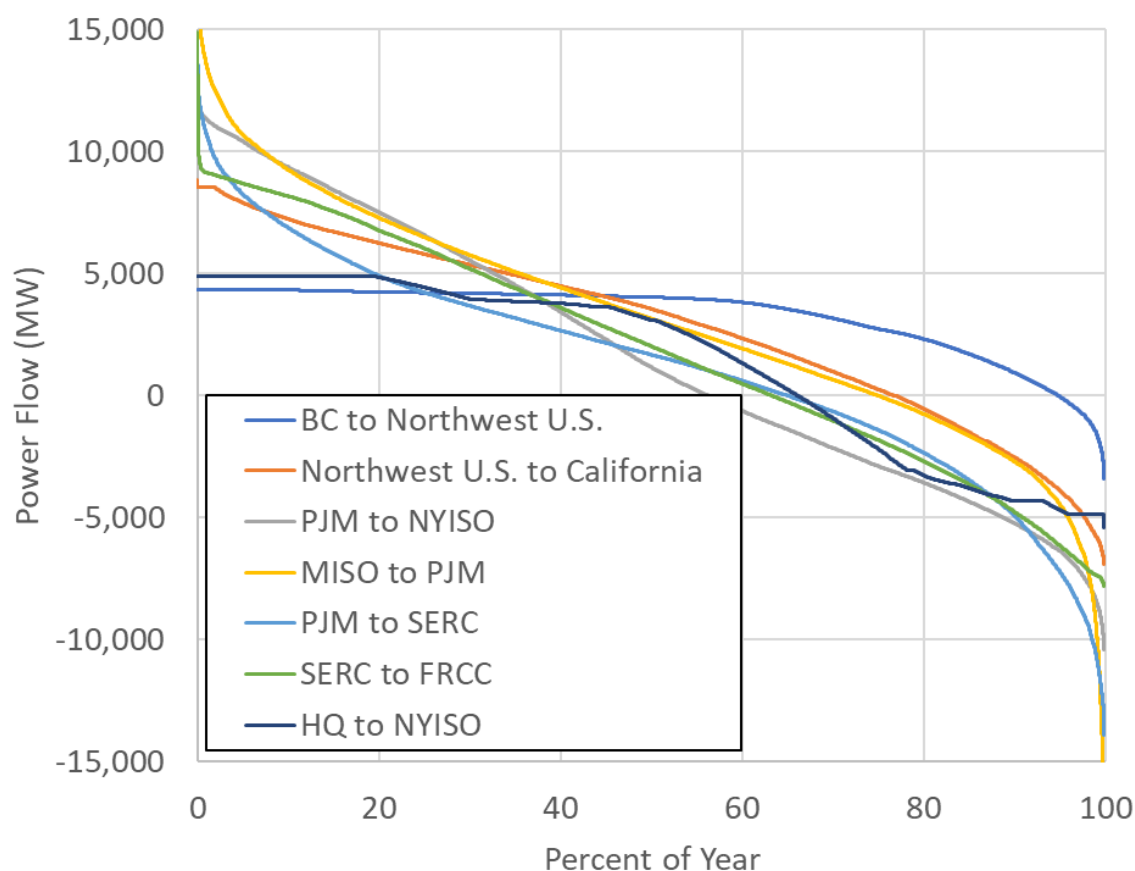


Figure 42. Duration curve of flows along major U.S. interfaces in Low Cost VG 2050

The region name listed first is the source region of the flow and the second name is the destination region. A positive flow means the source region is exporting to the destination region. A negative flow means the destination region is the exporting region.

3.4 System Flexibility

This section provides a general overview of flexibility in the scenarios, and the subsequent sections examine specific technologies.

3.4.1 Operational flexibility comes from transmission, flexible operation of hydropower and thermal resources, storage, and curtailment of wind and solar generation.

Figure 43 through Figure 45 show the dispatch of the three interconnections during a September week with several very high-load days a few low-load days. This period highlights these sources of flexibility in action. During the peak net load hours in the Eastern Interconnection (mostly around sunset), you see imports, storage, hydropower, and thermal generation all dispatching heavily, with thermal generation comprising more than half of the total generation (up to 59%). These hours represent the hours in the far left of the thermal generation duration curve in Section 3.2.3 (Figure 26 through Figure 28). By the late morning on September 8, thermal generation represents only 10% of generation. These are the hours at the far right of the duration curves in Section 3.2.3. Hydropower is also generating significantly less to save power for sunset hours. This flexibility in various technologies helps the grid to balance at high levels of renewable

contribution. Imports to the Eastern Interconnection are coming mainly from Canada, and the Eastern Interconnections and the Texas Interconnection are not exporting peak load hours (see below). Even during the high-load days, some curtailment of wind and solar generation occurs during midday hours. The curtailment often occurs near peak load in the early afternoon (during high load, high solar output hours), but almost never during the peak net load³³ hour (sunset each day). There is no unserved energy (load curtailment) in the PLEXOS model.

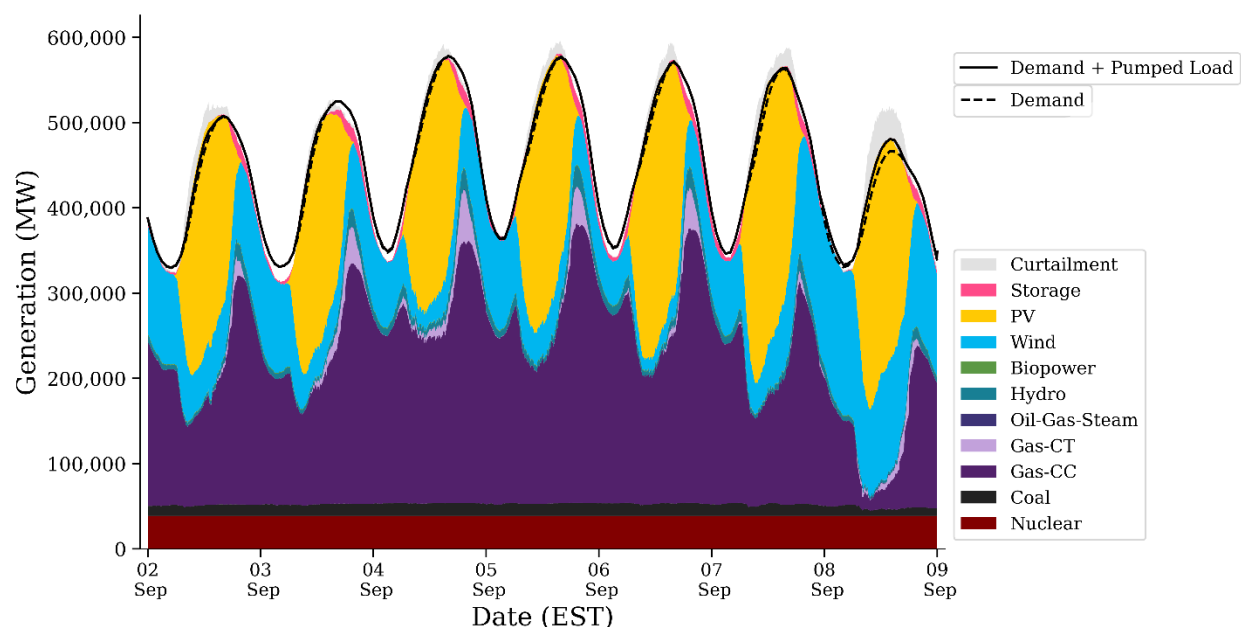


Figure 43. U.S. Eastern Interconnection generation dispatch stack for early September (Low Cost VG 2050)

Figure 44 shows the dispatch in the Western Interconnection during the same period. Many of the same features exist with the Eastern Interconnection but in different proportions (e.g., more hydropower). The U.S. portion of the Western Interconnection is importing from the Canadian portion during this period, and hydropower is contributing heavily in peak net load hours (sunset).

³³ Net load is the load minus available wind and solar generation.

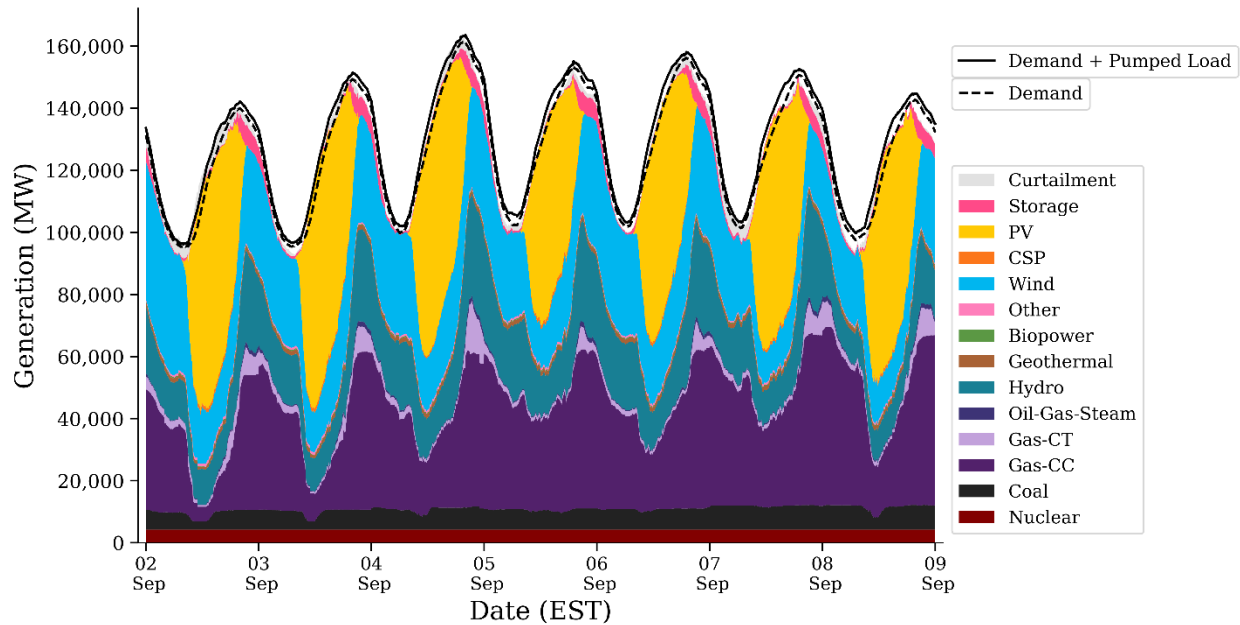


Figure 44. U.S. Western Interconnection generation dispatch stack for early September (Low Cost VG 2050)

Figure 45 shows the Texas Interconnection dispatch during the same week. It has many patterns similar to those in Figure 43 and Figure 44, although curtailment and exporting are seen at night (versus never or during day) and are likely driven by wind and load patterns (i.e., high wind and low load hours). Hydropower plays a minor role in the Texas Interconnection, and the dispatch there is made up entirely of wind, solar, and thermal generators.

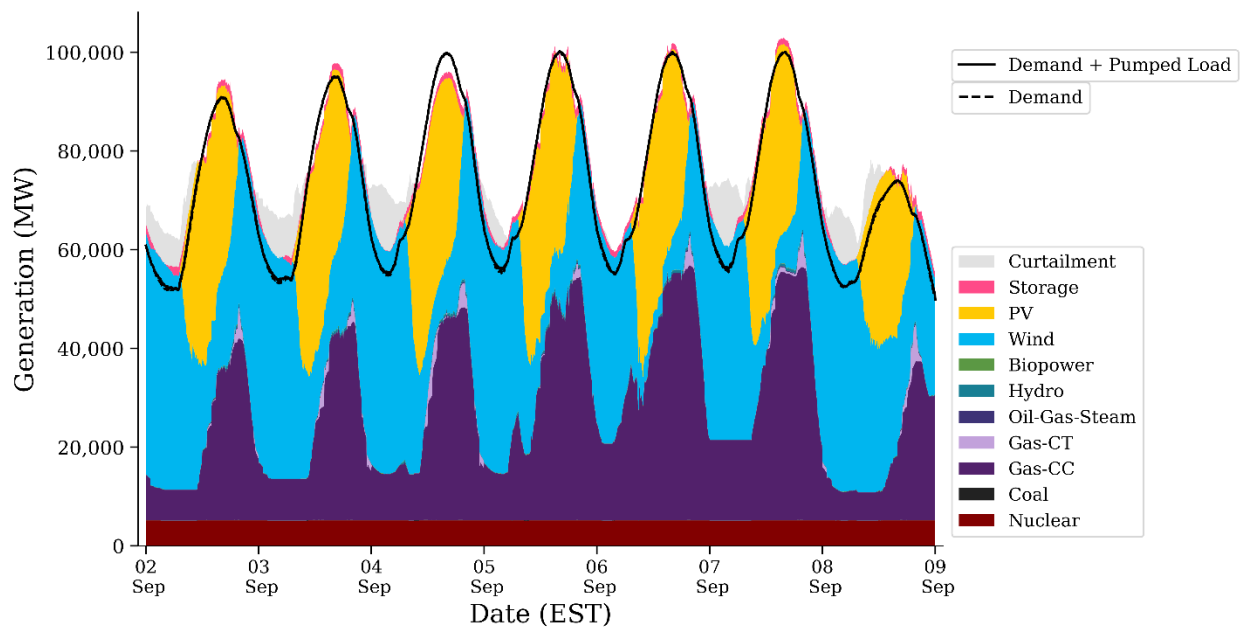


Figure 45. Texas Interconnection generation dispatch stack for early September (LowCost VG 2050)

3.4.2 Less than 10% of potential wind and solar is curtailed.

Figure 46 shows the duration curve of curtailment in the United States in the Low Cost VG scenario. In total, it represents 9.3% of the potential wind and solar generation in the United States. The bulk of the curtailment occurs in a small percentage of the hours, but curtailment occurs somewhere in the United States in almost every hour. Curtailment represents a trade-off between capital costs of wind and solar (or transmission and storage) compared to fuel costs of thermal generators.

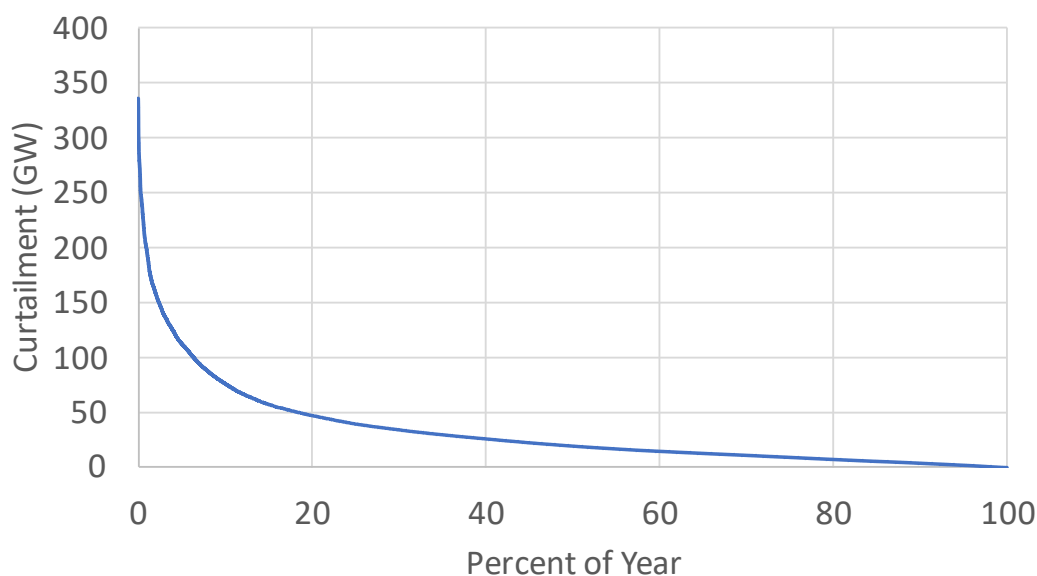


Figure 46. U.S. curtailment duration curve

Figure 47 shows the diurnal and seasonal patterns of curtailment in the United States. Most (but not all) curtailment occurs during the day, following the solar pattern until late afternoon hours, when the curtailment reduces before sunset. Curtailment also peaks in the spring months and is at a minimum in midsummer to late summer.

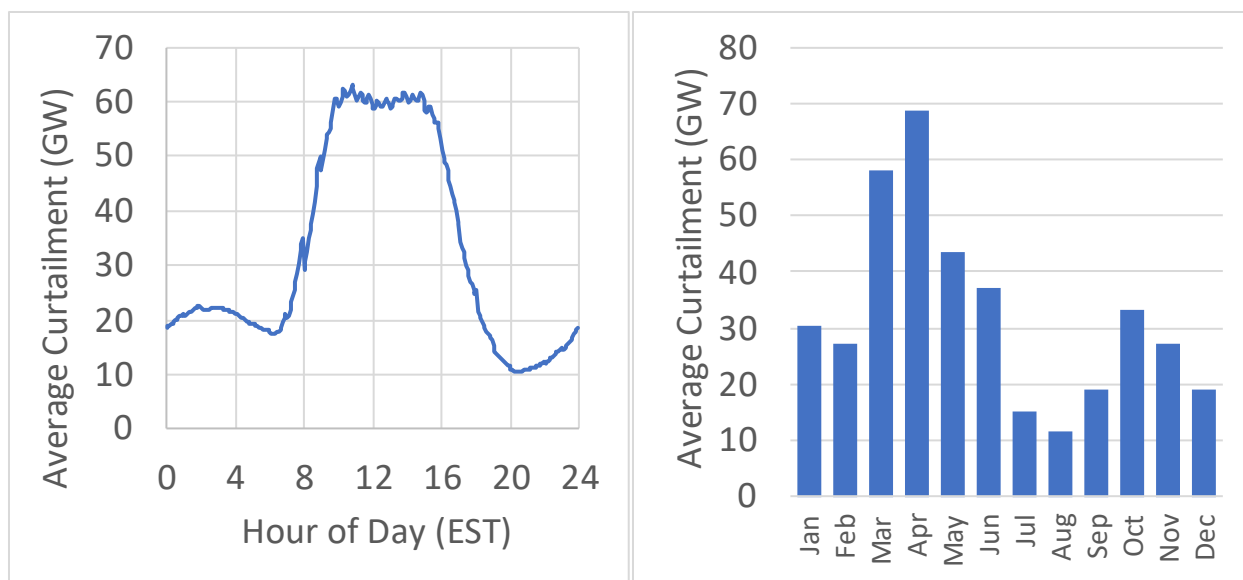


Figure 47. U.S. curtailment duration by hour (left) and month (right)

Figure 48 shows a week of U.S.-wide dispatch during May, a period with lower loads, and high solar and wind generation. Midday hours on May 10 and May 11 show hundreds of gigawatts of curtailment, and the thermal generation (mostly nuclear running flat and gas CCs cycling daily) operates similarly in each day. The curtailment varies widely through the week, but the actual dispatch is fairly consistent. Storage, imports and exports, and hydropower all play key roles, especially regionally, that are explored in Sections 3.3, 3.4, 3.5.

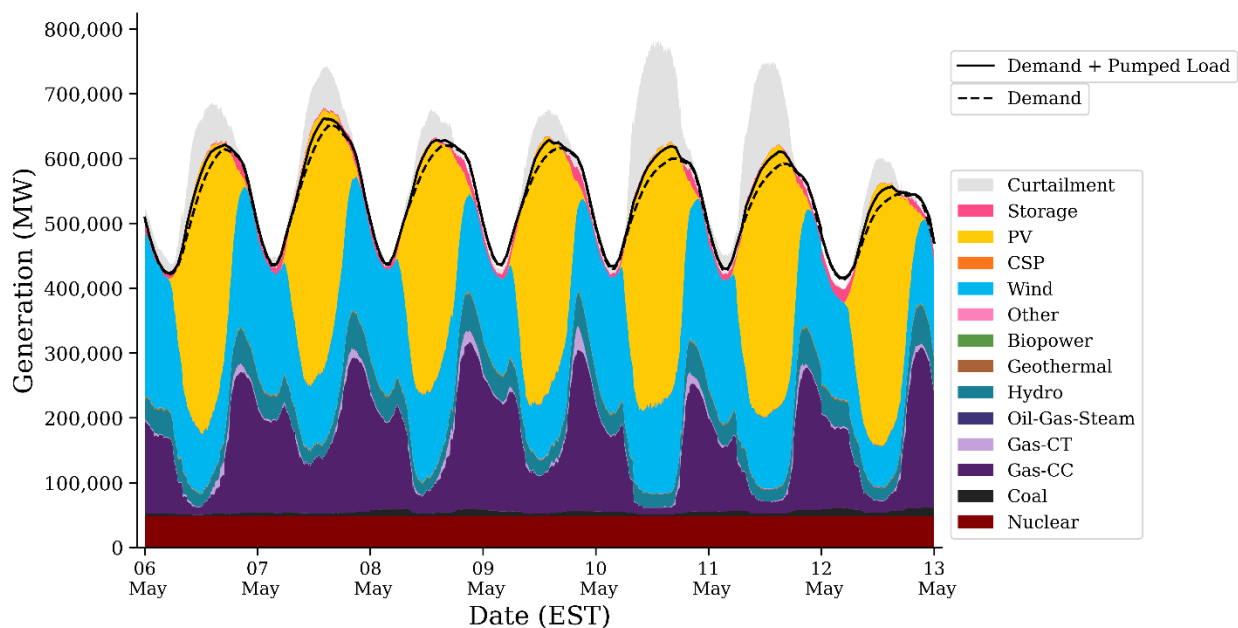


Figure 48. U.S.-wide dispatch stack during a high-curtailment period

3.4.3 Hydropower contributes significantly to energy, adequacy, and flexibility.

Figure 49 through Figure 51 qualitatively demonstrate the contribution of hydropower flexibility. Figure 49 demonstrates hydro's contribution to the adequacy and flexibility during a week in the Western Interconnection that includes low-load and high-load days. At the peak net load, hydro capacity is contributing more than 30 GW toward the 120 GW net load peak, even in the fall, when overall energy available for hydropower is low. Earlier in the week, when net load peaks are much lower, the hydropower generators are holding back energy for higher load days. This demonstrates the potential for flexible hydropower to generate most when needs are high and least when needs are low in the future grid.³⁴

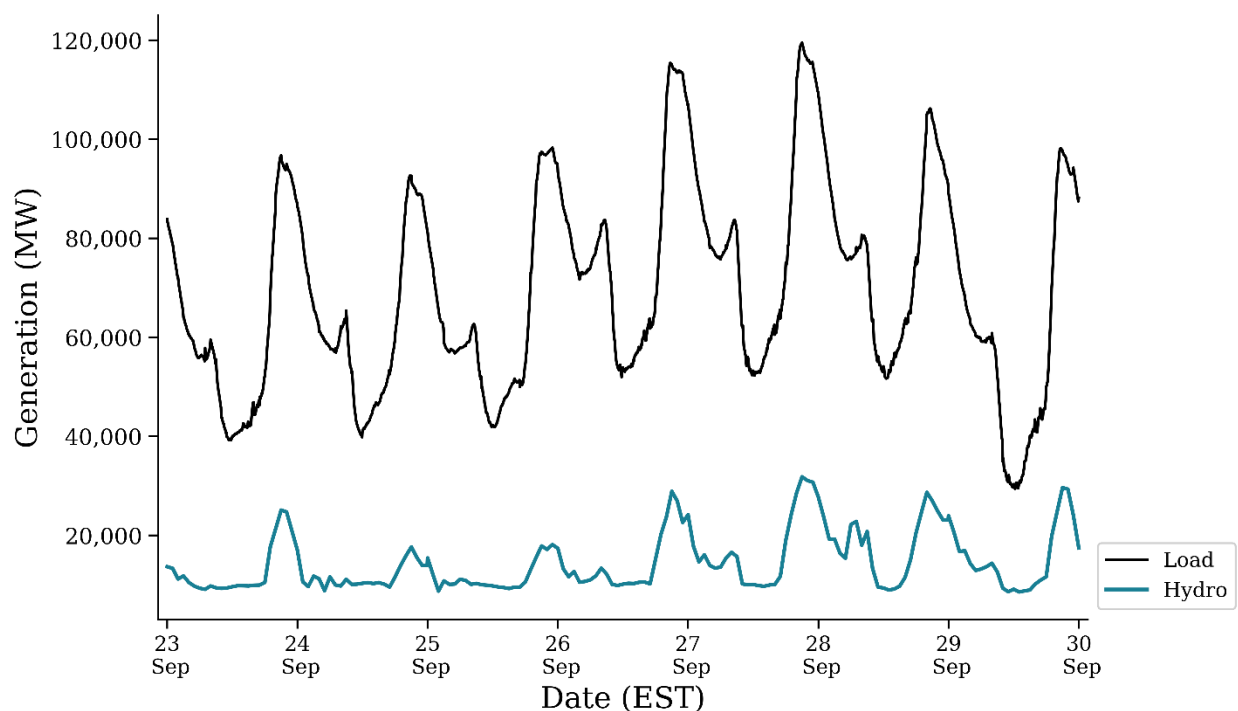


Figure 49. U.S. Western Interconnection hydropower and net load during a week with both high- and low-load days in September in the Low Cost VG 2050 scenario

Although average generation is low during this example of a week in September, the peak generation is much higher and contributes toward adequacy in the high-value periods.

Figure 50 shows the hydropower and net load again during a period in May with high curtailment (the same period shown in the dispatch stack in Figure 48). Average hydropower output is higher during this period despite lower loads than September. This demonstrates some of the seasonal limitations on hydropower flexibility based on the model assumptions (see Section 2.2.3). Some generators throughout the continent (e.g., Quebec) might have some interseasonal flexibility that is not considered here, but these seasonal limitations represent a real constraint on hydropower flexibility for many generators.

³⁴ This implies some ability to forecast these higher-load days in advance, although the model simplifications in the multiday dispatch prevent an unrealistic amount of information being available in the optimization.

The hydropower follows diurnal load patterns well in both weeks. In the model dispatch, hydropower contributes during both the larger peaks in net load (which is sunset in Figure 49 and Figure 50) and the smaller peaks that sometimes occur during hours around sunrise. The Eastern Interconnection hydropower dispatch shows some similar patterns, but hydropower makes up a much smaller fraction of the load overall.

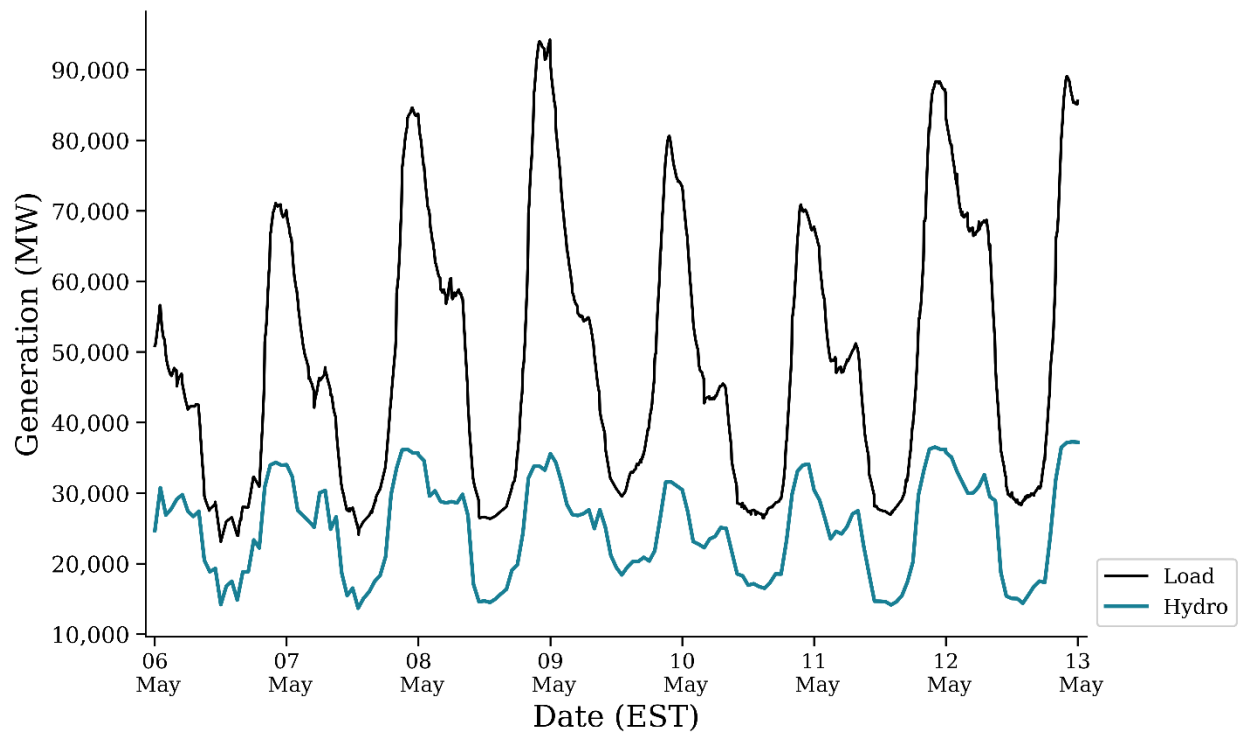


Figure 50 U.S. Western Interconnection hydropower generation and net load during a week with high curtailment

Average generation is significantly higher than during the September week, although the net loads are lower. This seasonal challenge demonstrates a constraint on flexibility, although the hydropower still follows the daily load pattern well, helping contribute in higher-value hours and reduce generation in hours when curtailment is happening the most.

Figure 51 shows the total U.S. net load versus total U.S. hydropower generation for the year. The strong correlation indicates that even with the modeled limitations to flexibility, hydropower generally can contribute substantially when energy production has the most value to the grid (high net load) and reduce generation when it has the least (low net load).

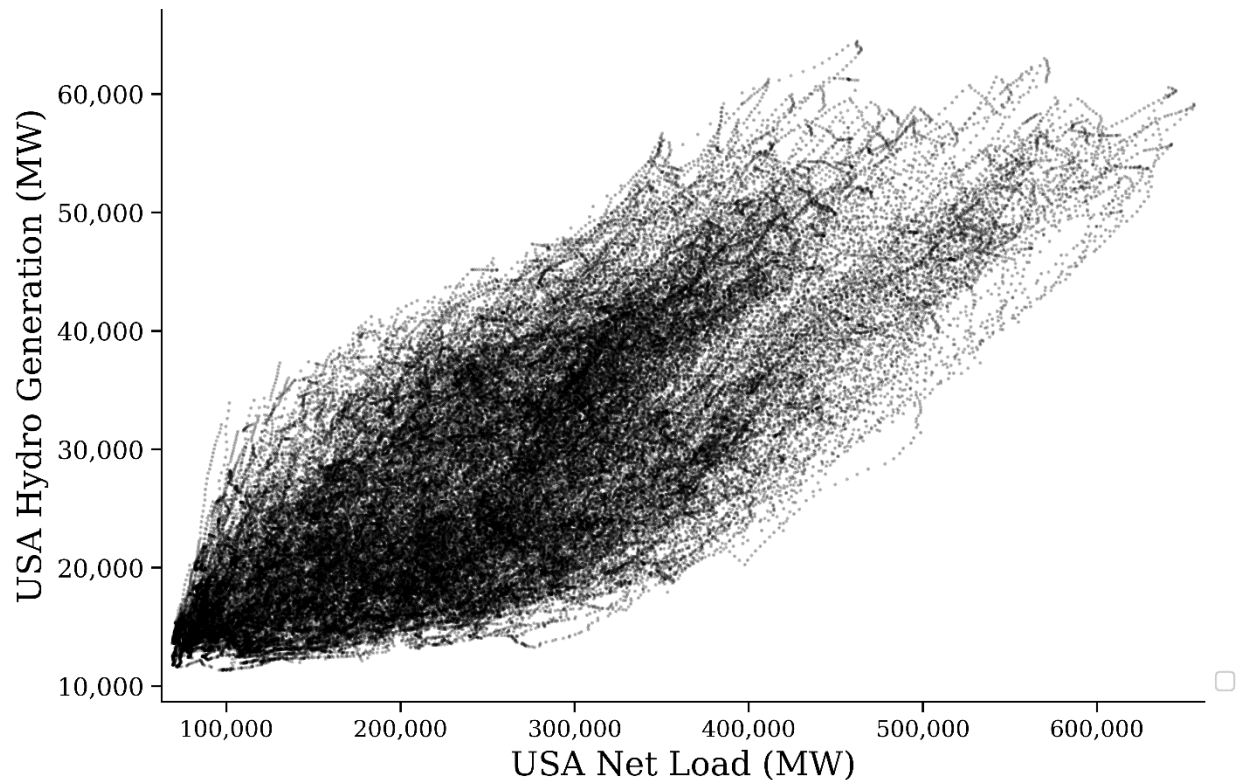


Figure 51 Total U.S. generation versus total U.S. net load for the entire year

Each dot represents a 5-minute interval in the PLEXOS model. The strong correlation indicates that hydropower is following net load patterns well and contributing to adequacy in high-value hours, and is helping reduce curtailment of wind and solar by generating less in low net load hours.

3.4.4 Hydropower flexibility reduces system costs by more than \$2 billion per year.

The previous section qualitatively demonstrates some of the value hydropower brings to the system, including generation during times of peak demands and the ability to turn down at other times. To explore these values quantitatively, we ran the unit commitment and dispatch model again assuming heavily constrained hydropower operations. By comparing the cases, we can understand the value and benefits of hydropower flexibility to this future scenario (Low-Cost VG 2050).

The Low-Cost VG scenario assumed hydropower flexibility intended to represent today's levels of flexibility. The constrained case assumed operations at all hydropower plants (not just run-of-river) have no flexibility (i.e., they have constant output, with the constant output varying monthly or daily based on water flows). Run-of-river plants were modeled with the same time series assumptions (historical flows) in both cases. This case was not intended to represent a realistic future, but to help estimate the benefits that the flexibility of hydropower provides compared to a hypothetical resource that cannot follow load. The key caveat for this valuation is that it is based on the amount of flexibility allowed in the model (see Section 2.2.3). Future work could further refine the representation of hydropower within the model and disaggregate the types of flexibility (e.g., determine how much benefit is from interday versus intraday flexibility).

Table 10 shows some of the impacts of hydropower flexibility on key metrics in the Low-Cost 2050 production cost modeling. Today’s approximate level of hydropower flexibility—compared to a completely inflexible hydropower fleet—could reduce annual operating (production) costs by 3.0%, curtailment by 0.6 percentage points, fossil-fueled generation by 1.6%, and emissions by 1.3%.

Table 10. Benefits of Hydropower Flexibility

Metric	Impact
Cost	Today’s level of hydropower flexibility reduces annual operating costs by \$2.3 billion, which represents 3.0% of the system production costs.
Curtailment	The flexibility of hydropower to turn down in periods of curtailment and generate more in periods of need reduces curtailment from 9.9% to 9.2%. ^a
Generation	The reduction in curtailment leads to a reduction in generation from fossil-fueled units of 22 TWh (1.6%); this includes an increase in coal generation of 4 TWh and a decrease in gas of 26 TWh. ^b
Emissions	Increased flexibility reduces emissions in this scenario by 1.3%.

These values are based on a comparison of the 5-minute dispatch model runs from the Low-Cost VG scenario with runs from an identical scenario with all hydropower flexibility disabled (i.e., dispatchable hydropower generators are assumed to have flat output levels for each month). U.S. and Canadian hydropower was included in the sensitivity, so results presented are aggregated for the continent.

^a Curtailment reported here is a U.S. and Canada average, because the sensitivity was done for all U.S. and Canada hydropower.

^b Because the dispatch of generators is a cost optimization, increased flexibility will lead to selecting lower-cost resources (in this case, coal because of fuel costs)

Figure 52 shows the annual pattern of daily cost reductions from hydropower flexibility. It is smoothed to limit the visibility of interday energy shifting. Although the reasons for the value likely vary by season, the overall value is similar between seasons. Curtailment is likely a strong driver of this value; the highest curtailment in the model and the highest monthly value of hydropower flexibility both occur in April. The lowest curtailment occurs in July and August, as does the lowest monthly value of hydropower flexibility. In high curtailment periods, like the spring, the value comes primarily from avoided curtailment. In low curtailment periods, it comes from a variety of sources, including substituting higher-cost peak generation with lower-cost resources.

From a hydrology perspective, the high-value periods do coincide with low-water times of the year for these modeling assumptions (see Section 2.2.3 for hydropower output by week). This might be due to the ability to shift power more easily when the quantity of water does not require generators to regularly run near capacity. More study of different hydrological conditions mixed with flexibility changes would help address this question.



Figure 52. Daily cost reduction from hydropower flexibility

This figure shows the smoothed, daily hydropower flexibility cost reduction, which averages \$6.3 million per day. It does not substantially vary by season, except a period in early March when the model shifts energy to another time if it is feasible to do so. The smoothing is a 30-day filter, to limit the impacts of daily variability due to substantially more or less energy generation from hydropower.

The above analysis is based on a typical hydropower year for all regions. We also reran the model with a 5% increase (wet) and a 5% decrease (dry) in energy availability at hydropower generators to see the different impacts (no changes were made to the capacity of the generators). The Dry case leads to an increase in production costs of \$1.1 billion. Most (27 TWh) of the approximately 35 TWh generation needed to make up for the reduced hydropower generation came from gas CCs, and 5 TWh came from reduced curtailment at wind and solar generators. In the Wet case, production costs decrease by \$0.9 billion. The additional curtailment from wet conditions is slightly higher than the reduction from wet conditions, and the 7 TWh additional wind and solar curtailment represents approximately 20% of the additional available hydropower energy.

Table 11. Impacts of Different Water Conditions

Metric	Dry	Typical	Wet
Cost, \$ billion (change from Typical)	\$78.5 billion (+ \$1.1 billion)	\$77.4 billion	\$76.5 billion (- \$0.9 billion)
Gas CT, TWh (change from Typical)	95 (+ 1)	94	93 (- 1)
Gas CC, TWh (change from Typical)	1,584 (+ 27)	1,557	1,534 (- 23)
Wind and Solar (TWh difference)	3,492 (+ 5)	3,487	3,480 (-7)

These values are based on comparing the 5-minute dispatch model runs from the Typical case to a Wet (5% additional energy from hydropower in every month) and Dry (5% reduction in energy).

3.4.5 Hundreds of gigawatts of storage could be installed if costs came down significantly.

In this section, we discuss the impacts of running the ReEDS model with the 2018 ATB Low-Cost assumptions for storage, compared to the Mid-Cost assumptions that were used for the core cases. In the core nonelectrification scenarios (BAU, Low-Cost VG, and CO₂ Constrained), storage capacity in 2050 is 30 GW–55 GW. In the Electrification scenario, storage capacity is noticeably higher at 130 GW. Figure 53 shows the change in capacity in the core scenarios assuming low-cost storage (based on the 2018 ATB). In the nonelectrification scenarios, storage capacity is approximately 200 GW higher by 2050. In the electrification scenario, there is approximately 350 GW of additional storage by 2050. The existing pumped-storage hydropower was modeled in all scenarios and included as storage (not hydropower) in all plots; the new builds in the core and Low Cost Storage scenarios are primarily batteries with 4 hours of storage capacity.

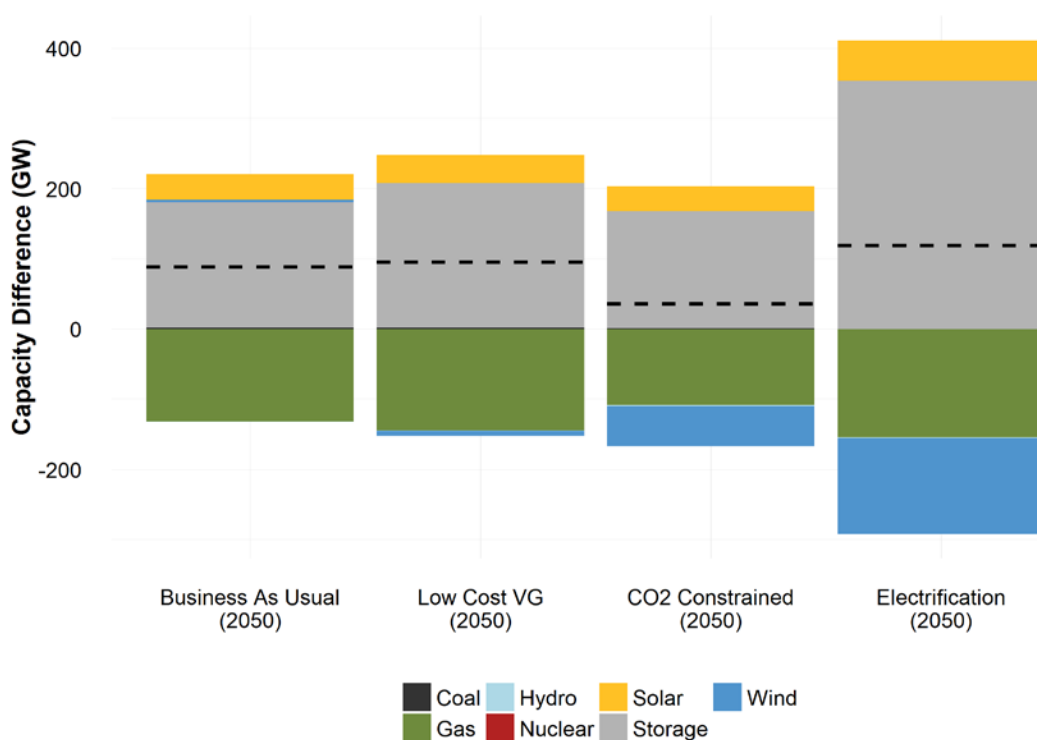


Figure 53. Change in 2050 capacity for core scenarios with lower-cost storage availability

Each core scenario was modeled with standard (2018 NREL ATB Mid Cost) assumptions for storage costs. As a sensitivity, each core scenario was also modeled with lower storage cost trajectories through 2050. The difference between each sensitivity and each core scenario is presented here. The dashed line represents the net capacity impact for each scenario and sensitivity pairing. For all scenarios, the total capacity is higher in the Low Cost Storage cases.

The importance of the contribution of storage to adequacy in these low-cost storage scenarios is shown in Section 3.2.2, where the contribution of renewables plus storage to planning reserve is seen to be hundreds of GW higher in the low-cost storage cases because of the high storage deployment. Deployment of thermal generation (a mixture of gas CCs and CTs) is also several hundred GW less in the low-cost storage scenarios because of the adequacy provided by the storage.

3.5 Scenario Comparisons

In this section, we compare some of the key outcomes of the scenarios, including costs, emissions, distributed generation, and the impacts of electrification.

3.5.1 Emissions drop substantially in all scenarios.

Figure 54 shows the emissions trajectory through 2050 in the core scenarios. Existing state renewable portfolio standards and clean energy standards drive CO₂ reductions through 2028. The carbon limits in the model (80% reduction by 2050 in the CO₂ Constrained and Electrification cases) are binding starting in the late 2020s. Emissions reductions from the electrification of additional energy end uses in the Electrification scenarios are not considered in this plot, so the Electrification scenario could be part of much larger emissions reduction in the overall energy system. In the Electrification Futures Study, nonelectric sector emissions reductions that were enabled by the newly electrified end uses were approximately 1,500 million metric tons per year in 2050, which is more than the electric sector emissions reductions shown here in any of the scenarios between 2020 and 2050. Between 2030 and 2040, the Low-Cost VG trajectory has significantly lower emissions than the CO₂ Constrained. However, they are nearly identical by 2050.

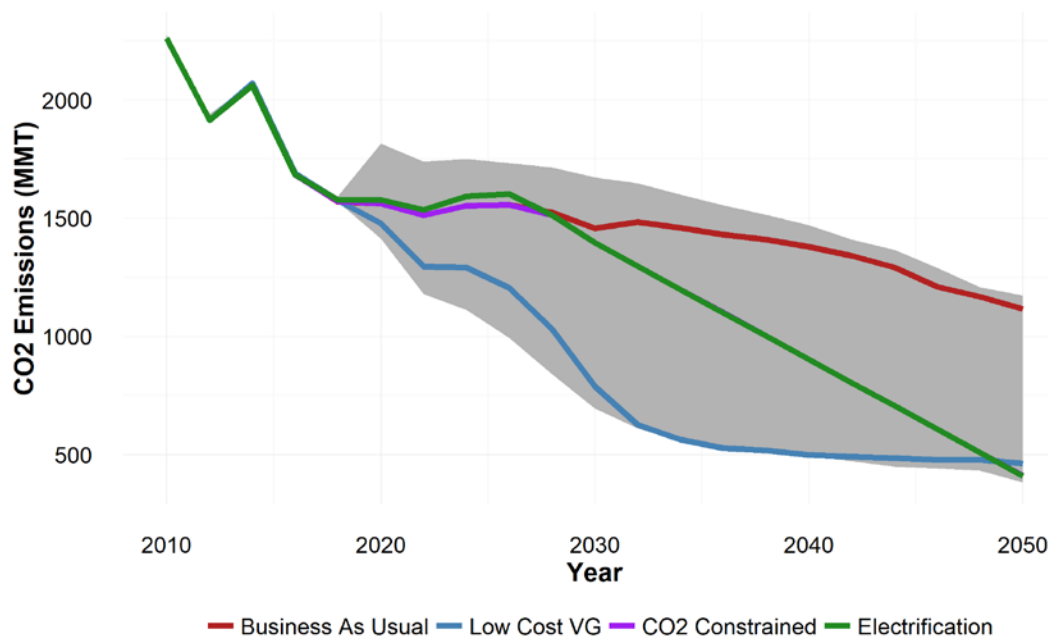


Figure 54. U.S. CO₂ trajectory through 2050 in the core scenarios

The emissions reductions from the electrification of energy end uses (e.g., transportation and heating) in the Electrification scenario are not considered in this plot. The CO₂ Constrained and Electrification scenarios follow an identical trajectory after 2028 because of binding carbon constraints.

3.5.2 Distributed generation is likely to play a significant role in generation; costs strongly impact adoption.

The dGen modeling results for the United States are primarily drawn from the results of the *2018 Standard Scenarios Report* (Cole et al. 2018). This analysis examines the geographic distribution of DPV deployment across the United States over three cost scenarios as explained in Section 2.1.2.

The installed cost of distributed solar PV is the most significant factor affecting cumulative solar adoption. Based on the three ATB cost projections described in Section 2.1.2, Figure 55 displays dGen’s cumulative DPV deployment forecast by scenario. In the High Cost scenario, adoption climbs slowly from 28.2 GW in 2030 to 32.3 in 2050. This slow growth is unsurprising, as the cost of solar remains consistent at 2018 levels in the High Cost scenario, leading to a stagnant market once the least-cost agents have adopted. In the Mid-Cost scenario, adoption increases to 57.3 GW in 2030 and 116.2 GW in 2050. Despite this growth, adoption is still concentrated in the residential sector (91.9 GW). In the Low Cost scenario, some 83.1 GW are adopted by 2030 and this grows to 232.6 GW by 2050. In this scenario, the commercial sector sees significant growth (55.9 GW by 2050) as payback periods are achieved that can compete with the generally lower-cost electricity purchased by commercial businesses.

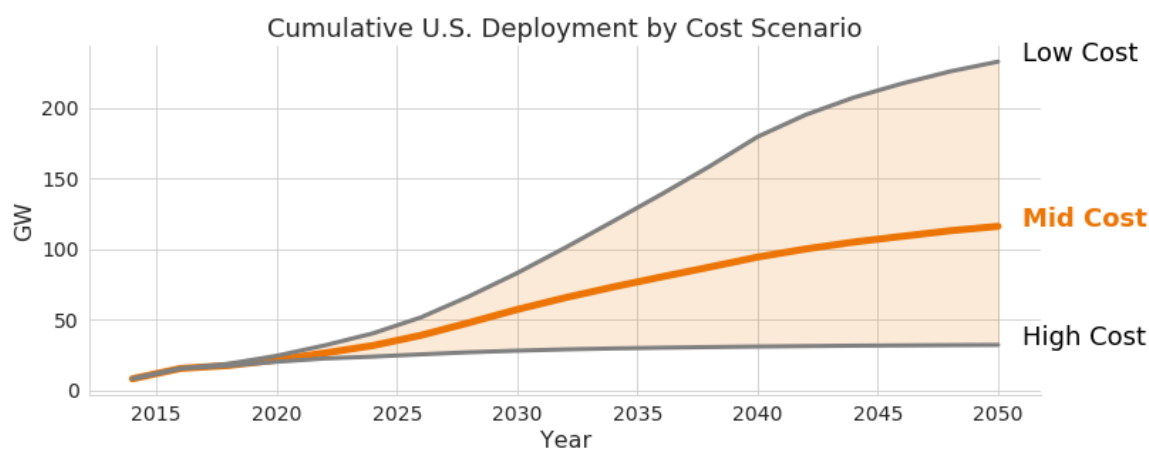


Figure 55. Cumulative U.S. DPV deployment by cost scenario

Differences in adoption levels between geographies can also be explained by *policies* (including tariffs such as NEM, subsidies, and other incentives) and *resource quality* (as measured by global horizontal solar irradiance). Resource quality influences the differences in the capacity factor that comparable PV systems would be able to produce, as displayed in the solar resource map included in Figure 1. The differences from policies and resource are explored in Table 12 (page 76) and Figure 56 (page 77).

Table 12 provides a heat map of the temporal and geographic trends of adoption within U.S. regions. Adoption is considerably concentrated in only a few regions, with 24% of 2050 adoption concentrated in only two regions, and 51% concentrated in the top five regions (for the Mid Cost NEM scenario). The coasts dominate rooftop solar adoption, including the service areas for system operators in the Middle Atlantic (PJM), Florida (Florida Reliability Coordinating Council, or FRCC), the Southeast (SERC-E), and California. Some of this is likely due in part to higher resource quality in these areas (e.g., Florida versus New York). Also, strong state policy

support or comparatively expensive retail electricity costs boost adoption in New England (ISO-NE), which otherwise has lower solar resource quality. Table 12 also shows the impact of extending NEM policies that do not have a legislated end date (the net metering cases), compared to assuming all regions transition to a tariff where electricity sold to the grid is compensated at wholesale rates (net billing).

Table 12. Cumulative Adoption (GW) in 2050 by Region for Cost and Policy Sensitivities

Region	Low Cost		Mid Cost	
	Net Metering ^a	Net Billing ^a	Net Metering ^a	Net Billing ^a
PJM-E	26.7	19.4	14.1	8.2
FRCC	28.1	10.3	14.1	3.7
SERC-E	19.0	13.8	12.2	5.8
CA	22.0	22.1	10.8	10.8
ISO-NE	14.0	10.3	8.5	4.8
PJM-W	18.0	13.6	8.5	4.5
MISO-E	17.6	9.8	8.5	3.0
NWPP-NW ^b	11.9	8.5	6.6	2.9
SPP ^c	13.1	7.1	5.5	1.9
MISO-S	10.3	6.1	4.9	1.5
ERCOT	14.7	14.7	4.7	4.7
SRSG ^d	6.8	5.5	3.6	2.7
MISO-W	8.4	2.8	3.5	0.8
RMRG ^e	4.6	1.7	2.6	0.8
NYISO	5.2	5.2	2.5	2.5
NWPP-S ^b	3.7	3.2	2.4	2.1
SERC-SE	5.0	3.8	2.0	1.2
SERC-N	3.2	3.1	1.2	1.0
Total	233	161	116	63

^a Net metering assumes state NEM policies that do not have a legislated end date are extended, while net billing assumes all regions use a policy that compensates customers at wholesale rates for power sold back to the grid.

^b NPP-NW = Northwest Power Pool-Northwest; NPP-S = Northwest Power Pool-South

^c SPP = Southwest Power Pool

^d SRSG = Southwest Reserve Sharing Group

^e RMRG = Rocky Mountain Reserve Group

Figure 56 is a county-level map of the United States indicating the projected cumulative DPV installed capacity by the year 2040 from dGen's Mid Cost scenario (with net metering). The scenario shown in Figure 56 assumes policies such as incentives or NEM programs will continue until current statutes expire (as of November 2018). These policies likely explain some of the adoption in Northeastern U.S. states such as New York, Pennsylvania, and Massachusetts, which are expected to see substantial growth through 2040. On the other hand, states like Florida, and Arizona see high levels of adoption likely because of high solar resource availability. California

and North Carolina both benefit from both a favorable policy regime and substantial solar resource availability.

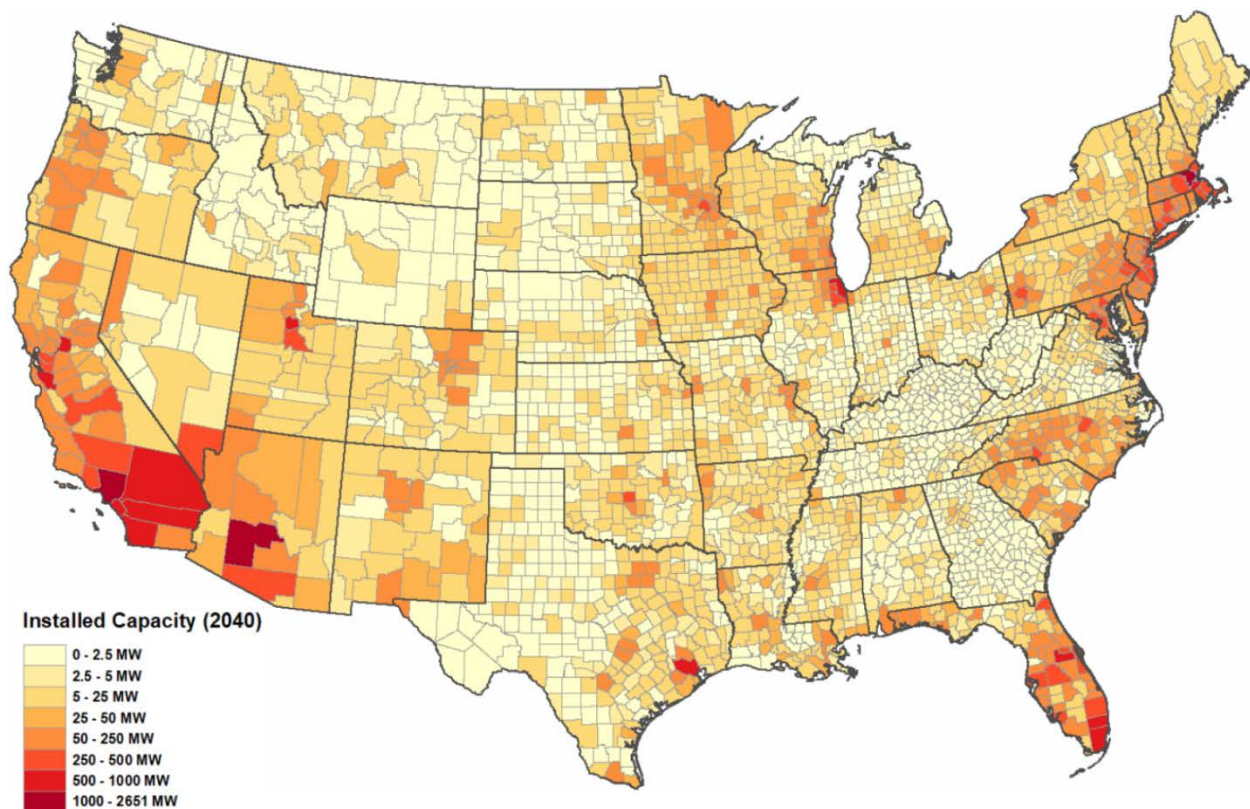


Figure 56. Projected DPV installed capacity (Mid Cost Scenario) by county

Across all geographies, solar resource adoption is temporally linked to factors such as the (increasing) cost of electricity and the (decreasing) installed technology cost of solar. Figure 57 shows a distribution of retail electricity consumption in North America by sector and cost (average \$/kWh inclusive of all fees paid by dGen agents). In the United States, the residential sector forms a normal curve with a mean electricity cost of around \$0.11/kWh in 2018 dollars. Commercial agents in the model pay somewhat less on average, although there is some bifurcation with bookends between \$0.03/kWh and \$0.15/kWh. Industrial agents pay substantially less on average, which indicates residential and commercial agents provide some level of cross-subsidization to support industry within the United States through retail rates. This pattern makes the economics of rooftop solar PV adoption more favorable among the residential sector by potentially offering a lower-cost source of electricity as the cost of solar decreases (installed costs per kilowatt were displayed earlier in Figure 9). All these rates are adjusted into the future based on electricity cost projections in the ReEDS model in the iterative process described in Section 2.1.2.

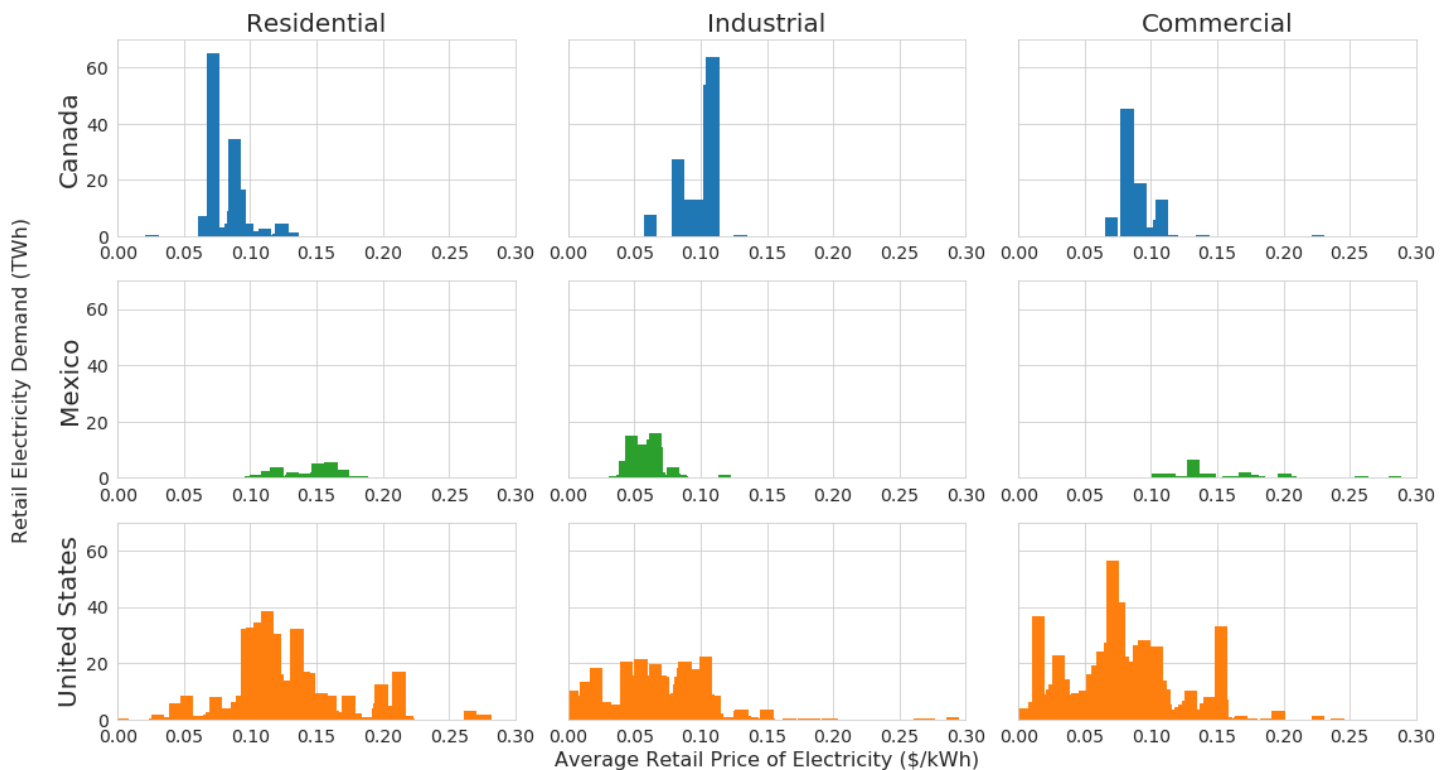


Figure 57. Histograms of average retail cost of electricity (\$/kWh) across United States by sector

Histogram bins are weighted based on total load, with rates based on the total charges (including, for example, any metering charges or demand charges) divided by total load. Data were populated in the Utility Rate Database (OpenEI, https://openei.org/wiki/Utility_Rate_Database); see the database for individual sources.

As the cost of electricity increases (modeled as an escalation within dGen, based on iteration with the ReEDS model) and the cost of solar decreases (in the Mid-Cost and Low-Cost scenarios of the ATB), the payback period of adopting DPV decreases. The payback period indicates the number of years of system operation needed to pay for financed system cost through retail electricity bill savings. Because of their higher average electricity cost in the United States, the residential sector achieves lower payback periods than other sectors as displayed in Figure 58 averaging 8.3 years across the United States in 2050 compared with 14.4 in the commercial sector and 15.5 in the industrial sector. As with adoption, payback periods vary greatly by geography. SERC-E which covers Georgia offers the lowest payback periods modeled by dGen of 5.8 years by 2050 in the Mid-Cost Scenario. NYISO contains average payback periods of 21.1 years. Though there is a trend in the results for greater adoption per capita in areas with low payback periods, other influences such as peer effects favor some regions over others.

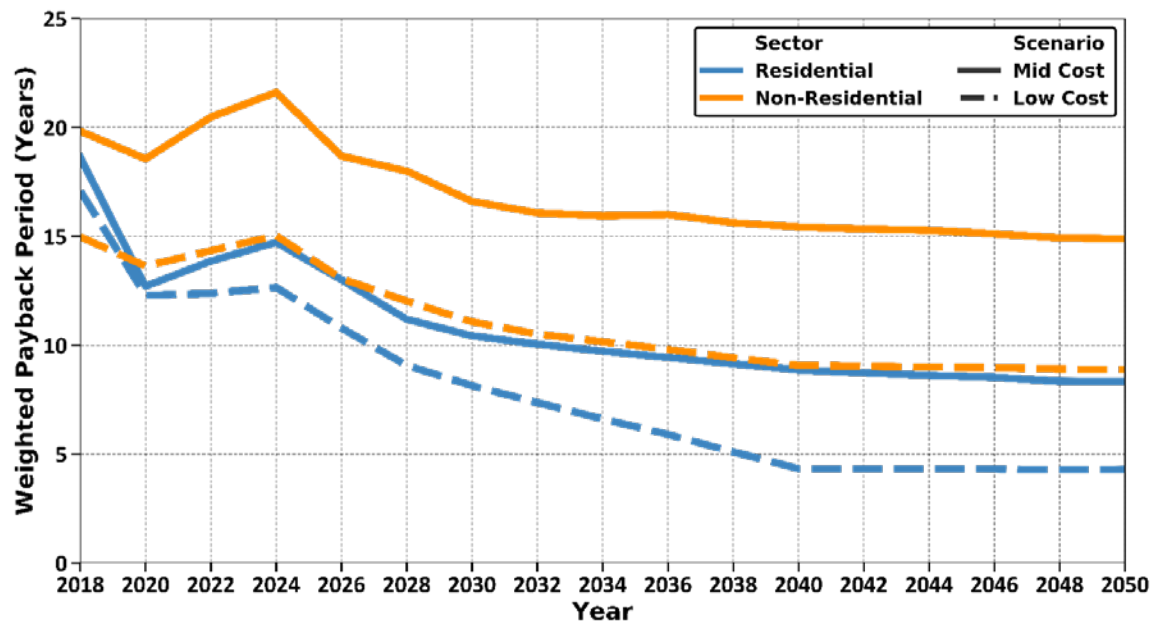


Figure 58. DPV payback periods by year across sectors and scenarios

In conclusion, dGen forecasts 63 GW–233 GW of DPV adoption by 2050 (depending on assumed costs and tariff structures), with the Mid Cost scenario forecasting 116 GW for the net metering case assumptions. Cost is seen to be the most significant factor in determining adoption rates, and factors such as policy regime and resource availability lead to a concentration of adoption in a few regions with lower payback periods for solar PV. The distributed PV adoption is allowed to contribute toward planning reserve and adequacy in the ReEDS and PRAS modeling (respectively), based on the same methods as used for other wind and solar technologies.

The Mid and Low Costs scenarios in dGen (with Net Billing assumptions) were used as inputs for the ReEDS modeling in the NARIS scenarios (Low Cost dGen was used for Low Cost VG scenario, and the Mid Cost dGen was used for all others). Note that there is substantial uncertainty between the cost trajectories.

3.5.3 Total costs are more sensitive to electrification and assumptions about wind and solar costs than carbon limits.

Figure 59 shows the total system costs of the core scenarios through 2050. Comparisons of scenarios depend on several key assumptions—the most important of which are likely the assumed cost of wind and solar generation and the assumed price of natural gas. Based on the standard (2018 ATB) cost assumptions, the carbon constraint (80% reduction from the U.S. grid compared to 2005) leads to a 6% increase in costs. The CO₂ Constrained scenario reduces cumulative continental emissions by 10.5 billion metric tons at an average cost of \$39 per metric ton over the 30-year time horizon.

Low-cost wind and solar assumptions lead to overall cost reductions of 16% over the BAU with even lower carbon emissions (through 2050) than the CO₂ Constrained scenario. Although the exact values are sensitive to assumptions, the low-cost wind and solar trajectories consistently lead to higher deployments of wind and solar in NARIS, both in the final scenarios presented here and previous iterations with different cost trajectory assumptions.

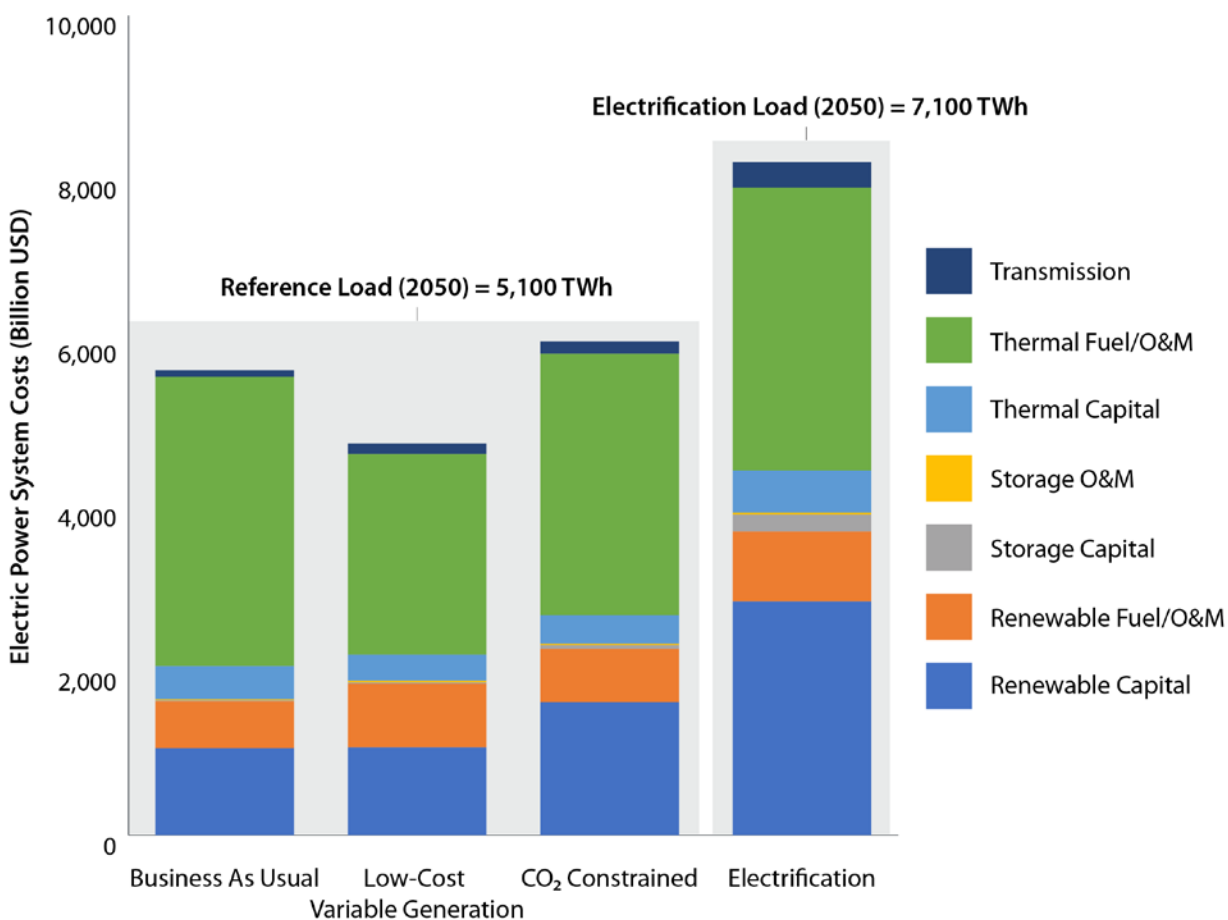


Figure 59. Total U.S. system costs for the core scenarios

The Electrification scenario costs include only electric sector costs and represent a large difference in 2050 demand (2050 annual demand is noted on figure); this does not consider the savings from reducing energy use in other sectors.

3.5.4 Widespread electrification requires approximately doubling infrastructure investment from other core scenarios; further research is needed.

Most of the scenarios in this study assumed load growth consistent with default assumptions that assume minimal newly electrified loads in 2050 (see Section 2.2.2). To understand how key conclusions from the study could change under a high-electrification scenario, we applied the load profiles created for the High Electrification scenario in the Electrification Futures Study for the United States to produce scenarios that assumed higher electrification of existing energy uses, such as transportation and building heating. We used the EnergyPATHWAYS model (using a slightly simpler methodology than the EnergyPATHWAYS used for the Electrification Futures Study) for Canada and Mexico.

EnergyPATHWAYS is a comprehensive energy accounting and analysis framework specifically designed to examine the large-scale energy system transformations. It has been used in more than a dozen national and subnational studies to calculate the impacts of energy system decisions into the future in terms of infrastructure, emissions, and cost impacts to energy consumers and the economy more broadly.

Projections of future energy service are based on projections of variables that correlate with energy services, such as population. These explanatory variables are referred to as service demand drivers and are exogenous inputs to the EnergyPATHWAYS model. Often a chain of explanatory variables are used to determine service demand in a single subsector. For instance, residential space heating demand is based on residential square footage, which is based on the number of households, which is based on total population. Creation of hourly electricity profiles involves the additional step of multiplying annual final energy by a unitized shape representing the portion of electricity demand that occurs in each hour of the year.

Figure 60 and Figure 61 show the projected load growth from electrification through time and by province respectively. Electrification could add 38% to U.S. load in 2050, with transportation comprising the largest share of the new demands. Generally regional distribution of electrification load growth is similar to regional distribution of load, although some regions will see significant changes to the patterns of electricity load growth. For example, regions in the Northeastern United States could shift from summer peaking to winter peaking (see Figure 61).

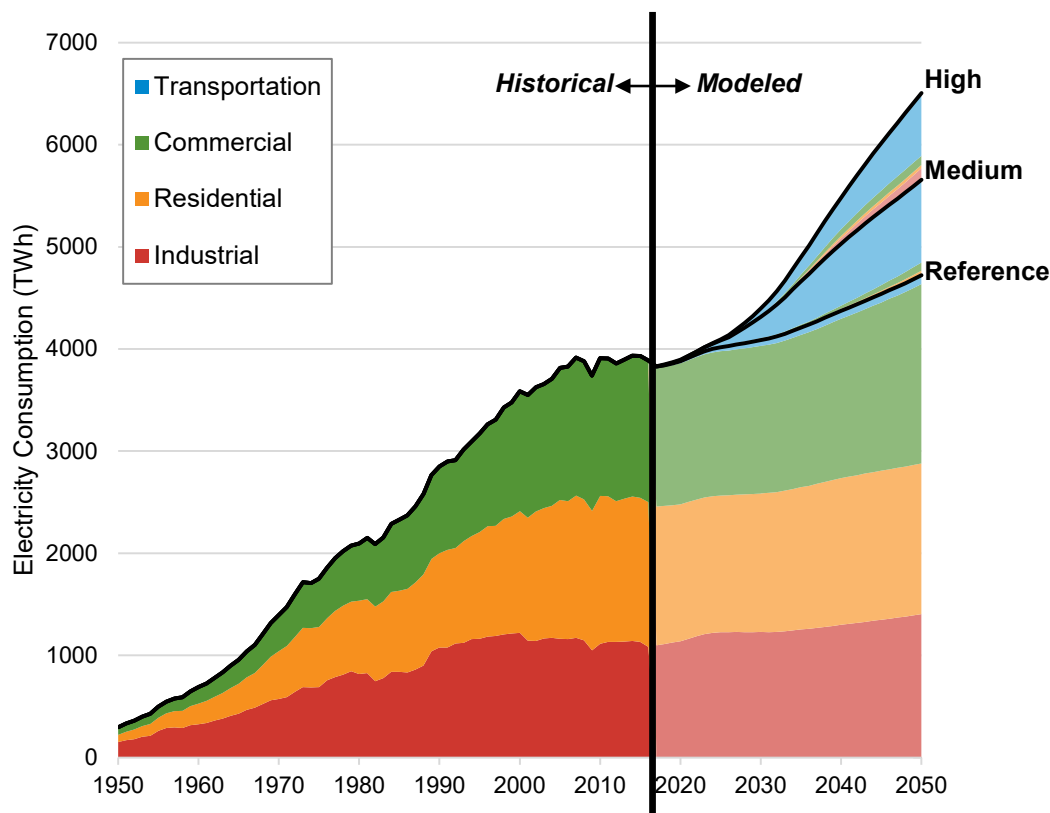


Figure 60. Load growth due to additional electrification in the Electrification scenario

The total load growth from electrification, shown here by sector, represents a 38% increase over the reference case in 2050. Source: Electrification Futures Study (Mai et al. 2018).

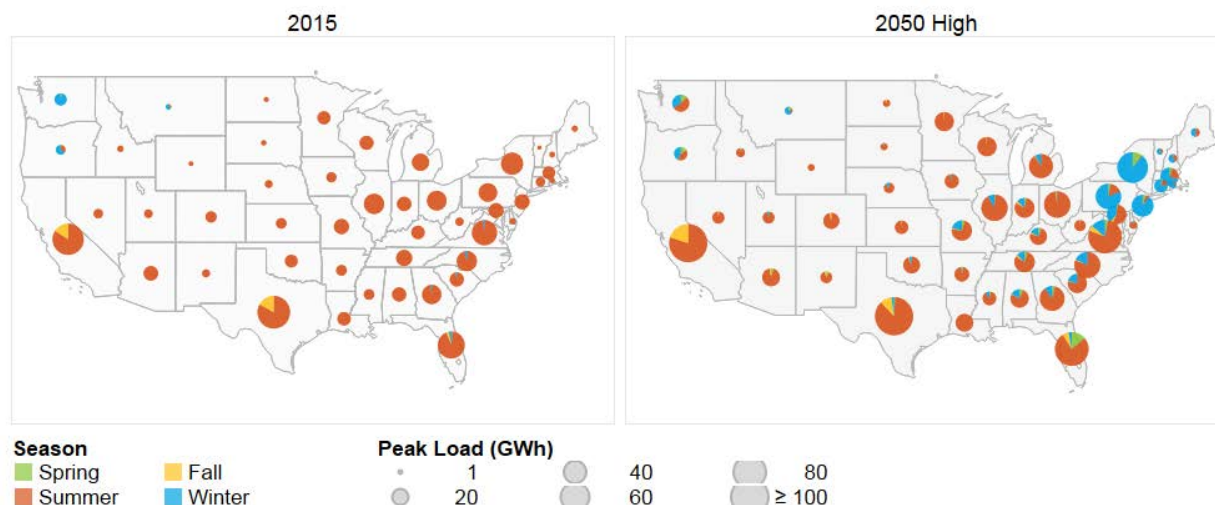


Figure 61. Electrification by state in 2050

The size of a pie charts corresponds with total electricity demand (GW) during the top demand hour. The pie wedges show the seasonal distribution of the top 100 hours with the highest demand by state. Seasons are defined along monthly groupings: summer includes June, July, and August; fall includes September, October, and November; winter includes December, January, and February; and spring includes March, April, and May. Data shown, including 2015 data, are based on modeled estimates from the Electrification Futures Study.

Figure 62 (page 83) shows the generation (left) and transmission (right) infrastructure built in the Electrification scenario versus the CO₂ Constrained scenario, which is the next closest scenario in terms of infrastructure built in the model. Wind and solar development, and transmission development, are approximately double in the Electrification scenario. Though the benefits of electrification (possibly including both economics and emissions) might justify the investment, the quantity of infrastructure development is notable when compared to the other scenarios.

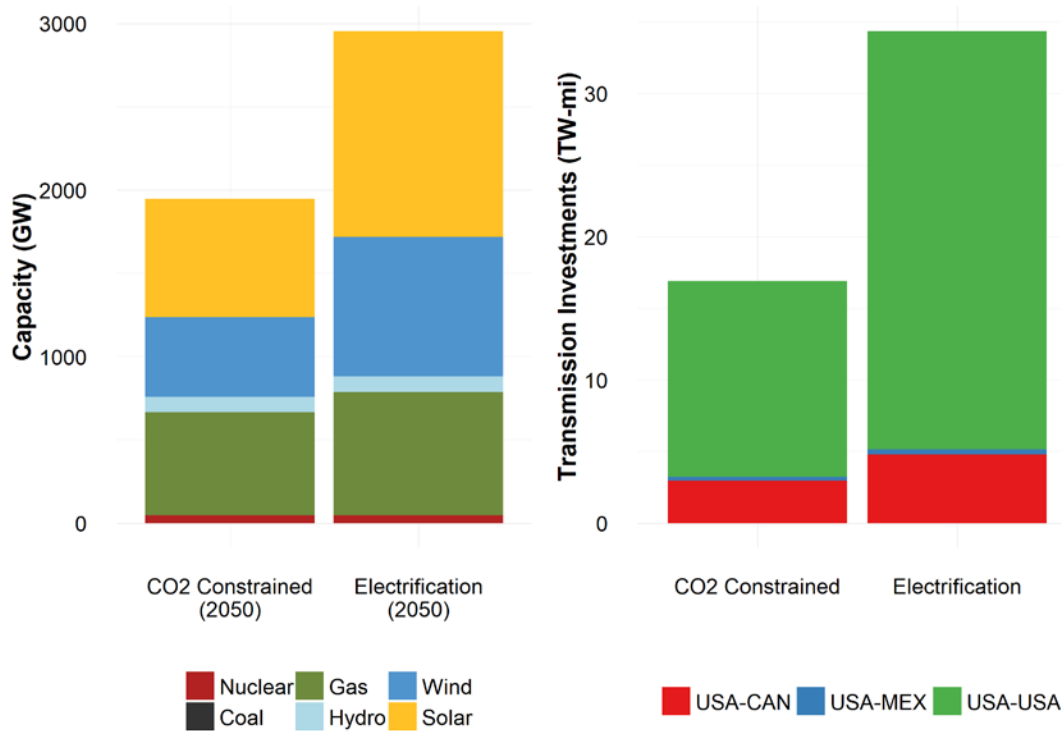


Figure 62. Generation capacity difference in 2050 (left) and total new transmission builds (right) between CO₂ Constrained and Electrification scenarios

The ReEDS model results for the Electrification scenario look similar to those for other scenarios in many respects, with one very substantial difference: the amount of infrastructure built in the Electrification scenario is much larger because of higher loads.

These results are from the ReEDS model; PLEXOS and PRAS were not run on any scenarios that included electrification. Studying demand flexibility in PLEXOS and PRAS could lead to conclusions that reduce infrastructure needs (due to lower planning reserve requirements if peak demands are more flexible) or increase infrastructure needs (if nodal powerflow analysis demonstrates that more intrazonal transmission is needed).

Outside of the general infrastructure builds and costs (which occur due to shifting infrastructure and costs to the electricity sector), the results from the Electrification scenario do not conflict with other scenarios on any key findings (including findings related to transmission value, exports, achieving low-carbon targets, and others). Methods recently developed for the Electrification Futures Study and other studies could help improve methods for treatment of these new, potentially flexible loads. In future work, the value of load flexibility can be addressed.

3.5.5 Using better information during unit commitment reduces costs and curtailment.

There is significant uncertainty about both (1) what the quality of wind and solar forecasts will look like in 2050 and (2) when commitment decisions will be made in regions both with and without ISOs. To address this uncertainty, we made three different types of forecasts and ran the PLEXOS unit commitment and dispatch modeling with each in the geographically decomposed method described in Section 2.1.3. Forecast data are described in Section 2.2.1.

A system operator in the 2050 grid could use better information during unit commitment in two ways:

- **Improvements in Wind and Solar Forecasting:** Advanced site-specific forecasting techniques were not specifically applied for NARIS, but such techniques could help achieve better information for use by operators in unit commitment.
- **Shorter-Term Commitment Horizons:** Though system operators today make many unit commitment decisions in the day-ahead time-frame, the U.S. grid in the NARIS 2050 scenarios consists mostly of generators that do not need commitment decisions to be made 24 hours in advance. Improved information could be used during unit commitment by performing operational commitment closer to real-time and repeating the process regularly. Such a “rolling” unit commitment method, in combination with generators that are flexible enough to adjust, could incorporate better information.

The model runs presented in Table 13 do not assume any specific rolling commitment horizon or forecasting technique; they use improved forecast information (from “blending” with real-time actual generation) to understand the potential benefit of using better information during unit commitment. Improving forecast error from 10% average MAE to 5%–0% reduces production costs by approximately \$1 billion (1%) per step and reduces curtailment by approximately one percentage point per step.

Table 13. Continent-Wide Cost Impacts of Forecast Quality Used During Unit Commitment

Forecast	Annual Production Cost Increase (\$)	Annual Production Cost Increase (%)	Total Wind and Solar Curtailment (%)
Perfect forecasts	N/A	N/A	9.1%
Forecast with 5% continental MAE (hours-ahead)	\$800 million	1.1%	10.4%
Forecast with 10% continental MAE (day-ahead)	\$2 billion	2.8%	11.1%

Forecasts were created using day-ahead model runs from the ECMWF model, time synchronous with the 2012 meteorology presented in this report for dispatch. The forecast with 5% plant-averaged MAE is used in other sections of this report. Note that these sensitivities are based on a penultimate hourly version of the model, and absolute numbers may not be consistent with other sections.

4 Discussion and Future Work

This report represents the findings of NARIS from a U.S. perspective. However, the overarching conclusions are nearly identical across the continent.³⁵ Key NARIS learnings for the United States include:

- Supply can balance with demand in a variety of scenarios, with high contributions coming from renewable resources continentally. This was demonstrated through unit commitment and dispatch modeling with nodal transmission representation for 1 year of meteorological data and 7 years of historical meteorology for the Monte Carlo resource adequacy modeling.
- Thermal generators (i.e., nuclear, coal, and gas) do not produce as much energy in the NARIS scenarios in 2050 as actual thermal generators produce today, but significant thermal capacity remains in the NARIS scenarios to serve capacity adequacy needs of the system. This result is economic from a system cost perspective, but more study is needed to understand the market implications. Increased transmission and storage could also fulfill some of these system roles, and they could be optimal depending on cost and emissions limit assumptions.
- Transmission helps enable economics and reliability (via resource adequacy) in the NARIS scenarios. Transmission expansion and cooperation between countries can save the system tens of billions of dollars, while transmission and cooperation between regions can save hundreds of billions of dollars.
- Flexibility to accommodate the variability in the system can come from flexible operation of hydropower and thermal generators, transmission, storage, curtailment, and other technologies and practices.

Key assumptions and limitations of the study, which are listed in Section □, include that:

- The ReEDS model used to create the transmission and generation expansion scenarios performs a cost optimization. Though this helps illuminate potential low-cost pathways to a reliable grid, it should not be read as a blueprint for the continent or any specific region.
- We ran scenarios with various assumptions about wind and solar costs, storage costs, natural gas prices, and other assumptions, and many of the conclusions in this report are robust to these assumptions. However, we represented only a small fraction of the infinite possibilities of combinations of all potential grid conditions in 2050.
- Although we addressed the adequacy portion of reliability, we did not address voltage or frequency stability in any detail in this work.
- Much of the work is based on meteorological conditions from 2007 through 2013. If these years are not representative of typical conditions in the future, or of certain types of extreme events, there could be gaps in our analysis. Climate change has the potential to lead to meteorological conditions different than what we have studied here.

³⁵ For our report of the NARIS findings from a Canadian perspective, see *The North American Renewable Integration Study: A Canadian Perspective*, which is available at “North American Renewable Integration Study,” NREL, <https://www.nrel.gov/analysis/naris.html>.

More study is needed to understand some of the key caveats and questions that remain after this work, including about:

- **Market Implications:** The optimizations in our sequence of models led to very different future operation for thermal generators (particularly natural gas combined cycle units) compared to their current operation. Existing market structures might not create sufficient revenue for these generators.
- **Extreme Events:** The NARIS scenarios were analyzed with state-of-the-art tools for data development and modeling. A variety of extreme meteorological events were considered in the 7 years studied (e.g., storms, heat waves, and polar vortex events). More-detailed analysis of how various technologies perform in extreme events (e.g., wind performance in a hurricane) could improve our understanding of grid reliability with today's infrastructure or the infrastructure of the future.
- **Transmission:** More-detailed transmission and power flow modeling could help us better understand the feasibility of the NARIS scenarios, and the costs and benefits of new transmission investments.
- **Demand:** The uncertainty of electricity demand patterns in the long-term future is significant due to climate change and electrification of other sectors. Building off the Electrification Futures Study, electrification-focused studies can also help refine and quantify the benefits of electrification to other sectors and understand the potential flexibility of new demands. For this study, the more detailed models (production cost and Monte Carlo resource adequacy) were not run on the Electrification scenario.
- **Evolving Technologies:** Technology cost improvements in NARIS sensitivities for storage and distributed generation led to significant increases in their deployment (hundreds of GW for each). Ongoing cost reductions for offshore wind in North America would likely lead to significant deployment increases. Other technology breakthroughs, including long-duration storage, carbon capture, geothermal, and concentrating solar power, could possibly lead to similar deployment expectations. Although the key conclusions in this report may be unaffected by these changes, there may be different conclusions or more efficient (or robust) ways to maintain a reliable low-carbon grid with emerging technologies over the coming decades.

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NREL/TP-6A20-79224 • June 2021

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-175
Tri-State and Platte River Request for Rehearing

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January 29, 2026

Via Email

Secretary Chris Wright
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Alex Fitzsimmons, Director
Office of Cybersecurity, Energy Security, and
Emergency Response
1000 Independence Avenue, SW
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Re: Craig Station, Order No. 202-25-7

Dear Secretary Wright and Mr. Fitzsimmons:

Pursuant to Section 313(a) of the Federal Power Act,¹ and Section 301(b) of the Department of Energy Organization Act,² Tri-State Generation and Transmission Association, Inc., and Platte River Power Authority hereby submit for filing the enclosed request for rehearing and for clarification.

Please contact me if you have any questions.

Respectfully submitted,

/s/ Jennifer Quinn-Barabanov

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¹ 16 U.S.C. § 825l(a).

² 42 U.S.C. § 7151(b).

**UNITED STATES OF AMERICA
BEFORE THE DEPARTMENT OF ENERGY**

In re Craig Order No. 202-25-14

) Order No. 202-25-14
)

**REQUEST FOR CLARIFICATION AND FOR REHEARING OF TRI-STATE
GENERATION AND TRANSMISSION ASSOCIATION AND PLATTE RIVER
POWER AUTHORITY**

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Pursuant to Section 313(a) of the Federal Power Act,¹ and Rule 713 of the Rules and Regulations of the Federal Energy Regulatory Commission (FERC or Commission),² and the applicable rules of practice and procedure,³ Tri-State Generation and Transmission Association, Inc. (Tri-State) and Platte River Power Authority (Platte River) (together, Petitioners) hereby file this Request for Clarification and Rehearing of the Order No. 202-25-14 dated December 30, 2025 (the Order) requiring Petitioners and their co-owners to keep coal-fired Unit 1 of the Craig Generating Station in Craig, Colorado (Craig Unit 1) open and available to operate. Craig Unit 1 was scheduled to shut down by December 31, 2025.⁴

SUMMARY

Petitioners and the Department of Energy (DOE) share the goal of securing reliable and affordable electricity generation assets for their service areas' energy grid, including in the event of an energy emergency. For years, Petitioners have engaged in thorough, deliberate, and industry-leading resource planning to achieve this same end. Petitioners' resource planning ensures that the communities they serve are supported by electricity generation resources sufficient to respond to

¹ 16 U.S.C. § 825l.

² 18 C.F.R. § 385.713 (2024).

³ U.S. Dep't of Energy, DOE Rehearing Procedures, <https://www.energy.gov/ceser/doe-202c-order-rehearing-procedures> (last visited Jan. 15, 2026); *see also* 18 C.F.R. §§ 385.214, 385.713.

⁴ Petitioners are co-owners of Craig Unit 1, and named recipients of the Order. Under the Commission's rules and regulations they are parties to this proceeding. However, if necessary to give them party status, out of an abundance of caution, Petitioners ask that this filing also be treated as a motion to intervene under Rule 214 of the Commission's Rules and Regulations. Petitioners' position on the Order and the nature of their interest are set forth in detail in this filing.

forecasted extreme weather events and demand growth, relying on coal, gas, dual-fuel, hydropower, solar, wind, and battery assets.

Petitioners will continue to work with DOE and other government agencies to secure reliable, affordable generation portfolios, but submit this request for clarification and rehearing because keeping Craig Unit 1 available to operate will not best meet DOE's goal of securing dispatchable electricity resources in the northwestern United States. Tri-State and Platte River, as member-owned and municipal public utilities, respectively, face unique challenges from the DOE's Order that lead them to file this request. The costs of compliance fall directly on their members and customers, who must now pay to respond to the DOE's finding that utilities in the northwestern United States have "a shortage of electric energy, a shortage of facilities for the generation of electric energy, and other causes," DOE Order No. 202-25-14 at 1 (Dec. 30, 2025). The members and customers must pay those costs even though neither Tri-State nor Platte River are experiencing these shortages and not all the members and customers served by Tri-State and Platte River are located in the region identified by the Order. For example, Tri-State has numerous members in New Mexico and Nebraska. Petitioners have already paid for and planned investments in the generation resources needed to secure reliable and sufficient capacity for their systems. The Order therefore imposes additional costs to Tri-State's membership and the communities served by Platte River.

Petitioners respectfully ask DOE to reconsider the Order and to work with Petitioners to find a more effective and affordable path forward, one that will not

delay retirement of Craig Unit 1. Petitioners continue to stand ready, willing, and able to work cooperatively with DOE and any other federal agencies to address energy emergencies in a manner that minimizes costs, promotes reliability, and complies with the law.

STATEMENT OF ISSUES

Pursuant to Section 313(a), Petitioners request clarification and, in the alternative, rehearing based upon the following issues:

1. By mandating Craig Unit 1's availability to operate and the terms under which it shall operate, and requiring related changes to Petitioners' physical property, the Order constitutes both a physical taking and a regulatory taking. Because the Order does not provide "just compensation" from the government, this is an uncompensated taking in violation of the Fifth Amendment to the United States Constitution. *United States v. Pewee Coal Co.*, 341 U.S. 114, 116 (1951); *Horne v. Dep't of Agric.*, 576 U.S. 351 (2015); *Ruckelshaus v. Monsanto Co.*, 467 U.S. 986, 1011 (1984).
2. Because DOE predicated the Order on long-term concerns, Petitioners were deprived of the process due to them pursuant to the Administrative Procedure Act (APA) and the Federal Power Act (FPA), and the Fifth Amendment to the United States Constitution. This constitutes a violation of Petitioners' due process rights as guaranteed by the Fifth Amendment. *Miller v. Campbell Cnty.*, 945 F.2d 348, 353 (10th Cir. 1991); *Pa. Gas & Water Co. v. FPC*, 427 F.2d 568, 576 (D.C. Cir. 1970).
3. There is a disconnect between the energy reliability concerns described by the Order and the means DOE directs for addressing those concerns as compared to alternatives. DOE, therefore, did not establish that the Order "best meet[s] the emergency and serve[s] the public interest." 16 U.S.C. § 824a(c); 10 C.F.R. § 205.373. It is, therefore, arbitrary and capricious.
4. The Order does not align with the statutory objectives of the Federal Power Act (FPA), because it requires the operation of an uneconomic resource and disrupts ordinary and orderly planning, development, and investment in generation resources. It is, therefore, arbitrary and capricious.

BACKGROUND

A. The Petitioners

Tri-State is a wholesale generation and transmission cooperative operating on a not-for-profit basis with its principal place of business in Westminster, Colorado. Organized and existing pursuant to the Colorado Cooperative Act,⁵ Tri-State is a public utility subject to FERC jurisdiction under Part II of the FPA.⁶ Tri-State is wholly owned by its electric distribution cooperative and public power district members (Utility Members) and three non-Utility Members (Non-Utility Members)⁷ and was formed by its Utility Members for the purpose of providing the Utility Members with wholesale power and transmission services for resale to their retail customers.

Through their participation in the cooperative, the Utility Members serve retail customers across Wyoming, Nebraska, New Mexico, and Colorado. Some, but not all, of the Utility Members and their retail customers are located in the 2024 Western Electricity Coordinating Council (WECC) Northwest region.⁸ The retail service territories of Tri-State's Utility Members cover approximately 182,000 square miles and their customers include suburban and rural residences, farms and ranches,

⁵ COLO. REV. STAT. § 7-55-101 *et seq.* (2019) (Cooperatives- General); Articles of Incorporation (2020).

⁶ *Tri-State Generation and Transmission Ass'n*, 170 FERC ¶ 61,221, at P 37 (2020).

⁷ Tri-State's Non-Utility Members are: (i) MIECO, Inc., a wholesale supplier of natural gas in the United States; (ii) Olson's Greenhouses of Colorado, LLC, a grower/distributor of plants throughout the western United States that has a contract to purchase thermal energy from Tri-State; and (iii) Ellgen Ranch Company, which leases property from a Tri-State subsidiary.

⁸ The boundaries of this region changed from 2024 to 2025, *see* note 24, *infra*.

and large and small businesses and industries, serving approximately 522,000 retail electric meters. Tri-State's Utility Members are the sole state-certified providers of electric service to retail (residential and business) customers within their designated service territories.

Tri-State owns, directly or indirectly, or controls the output of, various power generation facilities within the Western Area Power Administration's (WAPA) Western Area Colorado Missouri (WACM) balancing authority area, and purchases wholesale power within both the Western and Eastern Interconnections. Among other generation facilities, Tri-State is a partial owner of Craig Unit 1, with a 24% ownership share. Tri-State's generating facilities are included in the Western Power Pool reserve sharing pool. This pool facilitates sharing of generation reserves to be activated during a system emergency, such as loss of a generating unit or transmission line. Tri-State expects to participate in the Southwest Power Pool's (SPP) regional transmission organization, with respect to Tri-State's service in the WACM balancing authority area within the Western Interconnection, beginning in April 2026.

Platte River is a not-for-profit, municipally-owned power utility and joint action agency that generates reliable, financially sustainable, and environmentally responsible electricity for its owner communities of Estes Park, Fort Collins, Longmont, and Loveland, Colorado. Platte River is a political subdivision of the State of Colorado and a government-owned utility under FPA Section 201(f), 16 U.S.C.

§ 824(f). Platte River furnishes cost-of-service wholesale electrical power and energy to its four owner communities.

Platte River is headquartered in Fort Collins, Colorado. At Platte River's main generating facility, Rawhide Energy Station, Platte River has one coal-fired power plant, Unit 1, with a nameplate capacity of 280 megawatts (MW), as well as five natural gas-fired units with a total capacity of 388 MW. Platte River also purchases 297 MW of wind energy and 202 MW of solar energy through long-term power purchase agreements and is a preference customer of WAPA's Colorado River Storage Project and Loveland Area Projects, providing up to 78 MW of hydropower. Platte River is a partial owner of two additional coal-fired units, Craig Units 1 and 2, with an 18% ownership share in the Craig units. Platte River's share of the total net capacity from both Craig units is 151 MW. Platte River also owns and operates an integrated transmission system of high-voltage aerial and underground power lines that deliver electricity to the electric utilities of Platte River's owner communities in Northern Colorado. Like Tri-State, Platte River plans to participate in SPP's regional transmission organization beginning in April 2026.

B. The Craig Generating Station

Craig Generating Station is a three-unit, coal-fired power plant located in Craig, Colorado. Craig Units 1 and 2 were built by and are jointly owned by several utilities through what is known as the Yampa Project. Tri-State operates those two units on behalf of all the co-owners, including Platte River, PacifiCorp, Public Service Company of Colorado, and Salt River Project. Tri-State separately owns and operates

Craig Unit 3. Together, these units are transmission-interconnected to the broader power grid and supply electricity into Western energy markets.

As part of its resource plan to address the long-planned retirement of Craig Unit 1, Tri-State has placed into service the 145 MW Axial Basin generating facility. This facility, approximately 26 miles from the Craig facility, relies on much of the same transmission infrastructure. Absent the retirement of Craig Unit 1, this interconnection faces transmission constraints such that, when Craig Unit 1 remains interconnected and available to operate, Tri-State may be required to curtail output from Axial Basin when all facilities are generating at or near full output due to limited transmission capacity.

As a result of changed market conditions and state and federal requirements, Unit 1 has been scheduled for retirement since 2016, and Units 2 and 3 have been scheduled for retirement since 2020, beginning with Craig Unit 1 by December 31, 2025, followed by Craig Unit 3 by January 1, 2028, and Craig Unit 2 by September 30, 2028. A retirement date for each Craig unit is now specified in Colorado Air Quality Control Commission Regulation No. 23 on Regional Haze Limits.⁹ In 2016, Craig Unit 1's retirement date was adopted into what was then Colorado Air Quality Control Commission Regulation No. 3 on Stationary Source Permitting and Air Pollutant Emission Notice Requirements and the Regional Haze State Implementation Plan, the latter of which was approved by EPA in 2018.¹⁰

⁹ COLO. CODE REGS. 1001-27.

¹⁰ *See Approval and Promulgation of Implementation Plans; Colorado; Regional Haze 5-Year Progress Report State Implementation Plan*, 84 Fed. Reg. 47884 (Sept. 11, 2019); Co. Air Pollution

The Craig units have been fueled primarily by coal from the nearby Colowyo and Trapper mines. The Colowyo Mine has ceased active mining and transitioned to full reclamation, with two pits in final reclamation and the third transitioned to reclamation on October 15, 2025. Similarly, the Trapper Mine plans to cease active mining and convert to site remediation in calendar year 2026. Before the closure of the Colowyo Mine, Tri-State stockpiled sufficient coal to meet Tri-State's projected demand of the Craig Units 2 and 3 through their respective planned retirement dates. Before the Trapper Mine closes, Platte River will have stockpiled sufficient coal to meet its projected demand of the Craig Unit 2 through its planned retirement date.

C. Craig Unit 1

Craig Unit 1 can produce up to 427 MW of electricity and has been running since 1980. Over the last ten years, the operations and maintenance cost (without consideration of coal cost or depreciation expense) to run Craig Unit 1 has averaged \$12.99 million annually.¹¹ By the standards of an older coal plant, Craig Unit 1 has generally provided reliable performance when called upon. However, in the last three years (due primarily to economic factors and some forced outages), Craig Unit 1 has run well below half of its capacity for Petitioners.

Control Div., *Colorado Visibility and Regional Haze State Implementation Plan for the Twelve Mandatory Class I Federal Areas in Colorado* (Dec. 15, 2016), <https://oitco.hylandcloud.com/POP/DocPop/DocPop.aspx?docid=3303135>.

¹¹ Over the last ten years, the operations and maintenance cost to run Tri-State's share of Craig Unit 1 has averaged \$23.9 million annually (inclusive of coal cost and depreciation expense). Over the last ten years, the fixed operations and maintenance cost to run Platte River's share of Craig Unit 1 has averaged roughly \$2.3 million (exclusive of coal cost and depreciation expense) annually.

Operation and maintenance of Craig Unit 1 has been undertaken prudently to reflect the scheduled 2025 retirement. The Craig Unit 1 owners have deferred optional maintenance since 2019. Craig Unit 1 has had multiple breakdowns and required significant repairs to continue operating into 2025. On December 19, 2025, the unit suffered a valve failure that rendered Craig Unit 1 inoperable, although the unit is now available to operate following repairs made in direct response to the Order.¹²

D. DOE Order No. 202-25-14

On December 30, 2025, DOE issued Order No. 202-25-14. The Order declared that “an emergency exists within the WECC-NW assessment area due to a shortage of electric energy, a shortage of facilities for the generation of electric energy, and other causes.” DOE Order No. 202-25-14 at 1 (Dec. 30, 2025). The Order predicated its emergency on (1) “increasing demand” and (2) “shortage from accelerated retirement of generation facilities [that] will continue in the near term and are also likely to continue in subsequent years.” DOE stated, “[t]his 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.” *Id.* at 3.

DOE predicated energy reliability concerns on the 2024 Long-Term Reliability Assessment (2024 LTRA) from the North American Electric Reliability Corporation (NERC) for the WECC-NW assessment area, “which includes Colorado, Idaho,

¹² Tri-State Generation & Transmission Ass’n, Inc., *U.S. DOE Orders Tri-State to Keep Craig Generating Station Unit Operating Next 90 Days*, TRI-STATE (Dec. 31, 2025), <https://tristate.coop/us-doe-orders-tri-state-keep-craig-generating-station-unit-operating-next-90-days>.

Montana, Oregon, Utah, Washington, and Wyoming[.]” *Id.* at 1. DOE also pointed to the 2024 WECC Western Assessment of Resource Adequacy. The concerns included (1) greater “energy variability” due to the region’s use of wind and hydropower; (2) planned retirement of baseload generation facilities fueled by coal, natural gas and nuclear; and (3) projected regional load growth. *Id.* at 2.¹³

The Order required Tri-State and the other co-owners of Craig Unit 1 to:

1. Take all measures necessary to ensure that Craig Unit 1 is available to operate at the direction of either Western Area Power Administration (WAPA)—Rocky Mountain Region Western Area Colorado Missouri (WACM) in its role as Balancing Authority or the Southwest Power Pool (SPP) West in its role as the Reliability Coordinator, as applicable;
2. Limit operation of Craig Unit 1 to the times and within certain parameters to minimize adverse environmental impacts;
3. Provide daily notification to DOE reporting whether Craig Unit 1 has operated in compliance with the Order;
4. 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;
5. Update DOE on measures taken or planned to ensure operational availability of Craig Unit 1 by January 20, 2026; and
6. File with the FERC Tariff revisions or waivers to effectuate the Order with rate recovery available pursuant to 16 U.S.C. § 824a(c).

Tri-State has already taken and will continue to take steps to comply with the Order. In coordination with the other co-owners of Unit 1, it timely submitted its

¹³ The Order placed these concerns in the broader context of Executive Orders 14156 and 14262. Executive 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>; Executive Order No. 14262, 90 Fed. Reg. 15521 (Apr. 8, 2025) (*Strengthening the Reliability and Security of the United States Electric Grid*), <https://www.federalregister.gov/documents/2025/04/14/2025-06381/strengthening-the-reliability-and-security-of-the-united-states-electric-grid>.

update to DOE on January 20, 2026, describing the measures it has taken and plans to take to ensure operational availability of Craig Unit 1. Tri-State has submitted and continues to submit daily notification to DOE pursuant to the Order.

ARGUMENT

Petitioners seek rehearing and clarification on two fronts. *First*, the Order, as drafted, effectuates a taking of Petitioners' property under the Fifth Amendment to the United States Constitution without an adequate process to obtain constitutionally required compensation. *Second*, the Order does not meet Section 202(c)'s requirement for a reasoned finding that compels operation of Craig Unit 1 as the "best" solution to the identified emergency.

I. THE ORDER CONSTITUTES AN UNCOMPENSATED TAKING OF PETITIONERS' PROPERTY INTERESTS

Petitioners chose to close Craig Unit 1 largely because of the uneconomic nature of the facility, and Petitioners have taken numerous steps over the years to prepare for its closure. By mandating that Tri-State continue operating the facility on a sustained basis for months beyond its planned closure date, and thus directing its operations in a manner entirely inconsistent with Petitioners' own planned retirement of the facility, the Order effects an uncompensated taking of Petitioners' property in violation of the Fifth Amendment of the United States Constitution. By compelling continued operational availability of Craig Unit 1, DOE took effective control over the physical infrastructure of the facility and mandated a variety of changes to Petitioners' infrastructure and business operations, constituting both a *per se* physical and regulatory taking.

A taking is not prohibited so long as it provides just compensation, but this taking comes with no assured government compensation. FERC cost recovery shifts costs onto ratepayers; it does not assure compensation *from the government*. And, due in part to the broad scope of the declared energy emergency, FERC cost recovery related to the Order will be complex procedurally and substantively and could leave material costs unrecovered from the Order’s putative beneficiaries. The Order gives Petitioners no constitutionally adequate avenue for just compensation.

A. The Order Constitutes a Physical Taking

The Fifth Amendment provides, “private property [shall not] be taken for public use, without just compensation.” U.S. Const. amend. V. “When the government physically acquires private property for a public use, the Takings Clause imposes a clear and categorical obligation to provide the owner with just compensation.” *Cedar Point Nursery v. Hassid*, 594 U.S. 139, 147 (2021) (citation omitted).

Physical takings can take a variety of forms, including intermittent or limited-value intrusions. *Id.* at 149–55; *see also Loretto v. Teleprompter Manhattan CATV Corp.*, 458 U.S. 419 (1982). Moreover, “[i]f government action would qualify as a taking when permanently continued, temporary actions of the same character may also qualify as a taking.” *Ark. Game & Fish Comm’n v. United States*, 568 U.S. 23, 26 (2012). This is true even when the government has not seized title to a property but rather directed it to operate in a particular way. Temporary seizures of property to operate are takings in “as complete a sense as if the Government held full title and ownership.” *See Pewee Coal Co.*, 341 U.S. at 116 (quoting *United States v. United Mine Workers of Am.*, 330 U.S. 258, 285–86 (1947)).

The Order operates as a physical taking in two interrelated ways. *First*, by directing Petitioners to maintain and operate Craig Unit 1, on a prolonged basis,¹⁴ and in clear departure from Petitioners’ own planned retirement of the facility, the Order falls within a near-century-old tradition of classifying mandatory operations—even under wartime and emergency authorities—as takings that must be compensated. *Second*, even if not characterized as a government seizure of operations, the Order constitutes a physical taking by compelling Petitioners to make material physical changes to the plant, including repairing out-of-service equipment, requiring staff onsite, and physically diverting coal allocated for Craig Units 2 and/or 3 to fuel Craig Unit 1 as the facility’s operations deplete limited fuel reserves that were allocated to other units that remain operational and are needed for reliability—the depletion of these stockpiled reserves will require Petitioners to obtain replacement coal at uncertain future prices, creating an additional uncompensated cost. And because of transmission constraints, Craig Unit 1’s operations could further impede Tri-State’s use of the nearby Axial Basin generating facility by constraining Tri-State’s ability to inject power from that facility onto the grid.

¹⁴ Petitioners note that other similar Section 202(c) orders, issued to other utilities and on similar grounds, have been repeatedly renewed. *See, e.g.*, DOE Order No. 202-25-3 (May 23, 2025), *renewed for 90 days by* DOE Order No. 202-25-7 (Aug. 20, 2025), *renewed for 90 days by* DOE Order No. 202-25-9 (Nov. 18, 2025). Petitioners are reasonably concerned that DOE Order No. 202-25-14 could be similarly repeatedly renewed.

1. The Order's Direction of Prolonged Operations at Craig Unit 1 Contrary to Petitioners' Plan to Retire the Facility Constitutes a Physical Taking

Section 202(c) was enacted to address energy shortages that occurred during the First World War,¹⁵ making it particularly suitable for analysis under post-war interpretations of the Takings Clause. These cases show that, even in the context of an emergency, where the government takes control of part or all of a business's facilities to use and operate for the government's purposes, a compensable taking occurs, *see, e.g., United States v. Gen. Motors Corp.*, 323 U.S. 373 (1945) (holding that a government seizure of part of a leased warehouse space for military purposes was a compensable taking). Similarly, where the government requires a private business to operate in the public interest, this too constitutes a *per se* physical taking. *Pewee Coal Co.*, 341 U.S. at 116 (taking occurred when government responded to work stoppages and strikes at coal mines by directly operating them or arranging for their continued operation). Finally, these cases illustrate that a taking is particularly likely to occur where the imposition of government control extends over a lengthy period of time. *See Gen. Motors Corp.*, 323 U.S. at 375 (warehouse seized for more than a year); *Pewee Coal Co.*, 341 U.S. at 115 (government-directed operation of coal mine continued for more than 160 days).

In that light, the Order constitutes a taking of Petitioners' property. The Order requires Petitioners to, in relevant part: (1) take all measures necessary to ensure that Craig Unit 1 is available to operate; and (2) limit operation of Craig Unit 1 to

¹⁵ Benjamin Rolsma, *The New Reliability Override*, 57 Conn. L. Rev. 789, 789–846, 800–02 (2024) (hereinafter “Rolsma (2024)”).

certain times and parameters to minimize adverse environmental impacts. Even the narrowest version of the measures necessary to ensure that Craig Unit 1 is available to operate include extensive repairs to Craig Unit 1’s physical facility and the ongoing employment of some share of approximately 130 staff to maintain the Craig facility, operate equipment, and remain ready to operate. The Order requires Petitioners to take these significant steps, unnecessary but-for the Order, for a prolonged period of time. This closely resembles the sustained mandate to operate that the *Pewee Coal* Court held was a taking.¹⁶

Indeed, the federal government recently recognized that where the government appropriates the right to control operation of a facility and deprives owners of their freedom to dispose of their property, a taking has occurred. *See* EPA-R08-OAR-2024-0607-0067, Regional Haze Round 2 at 19–21 (Jan 9, 2026), <https://www.regulations.gov/document/EPA-R08-OAR-2024-0607-0067> (describing how the “unconsented closure” of a coal-fired power station constituted a *per se* taking of the facility owner’s property) (citing *Cedar Point Nursery v. Hassid*, 594 U.S. 139 (2021) and *Horne*, 576 U.S. 351).

By requiring Petitioners to involuntarily keep Craig Unit 1 available for operations according to the government’s instructions and mandating an

¹⁶ The *Pewee Coal* Court did not enjoin the government’s actions—the wartime emergency justified the government’s effort to keep coal mines operational. The fact of a justified emergency, however, did nothing to abate the Takings Clause requirement that the government compensate the plaintiff. *See Pewee Coal Co.*, 341 U.S. at 118 (holding that government is “entitled to the benefits and subject to the liabilities” of operating a facility it takes over).

unconsented re-opening of a non-operational facility—for not hours or days but months—DOE engages in a taking.

2. The Order Mandates Physical Changes to Petitioners' Property That Constitute a Physical Taking

The physical changes to Petitioners' property mandated by the Order also constitute a *per se* physical taking of Petitioners' property rights in Craig Unit 1 and other related property, such as fuel. *First*, mandating that Petitioners make Craig Unit 1 ready for operations compels Petitioners to make material physical changes to Craig Unit 1, including repairing out-of-service equipment that would otherwise remain unused. *Second*, operations require fuel, which compels Petitioners to deplete the Craig facility's limited fuel reserves intended for Craig Units 2 and/or 3 as operations at Unit 1 continue; these reserves were acquired and measured for the anticipated operation of two specific coal units and based on the assumption that Craig Unit 1 would retire at the end of 2025. Because the Order forces Petitioners to surrender and exhaust coal inventory for the government's chosen public purpose—coal that Petitioners acquired, allocated, and reserved for other units—it effects a *per se* physical taking of that property. And *third*, transmission capacity limitations for Petitioners' facilities at and near Craig Unit 1—the Craig units and Axial Basin—mean that requiring Craig Unit 1 to remain interconnected and possibly operating could constrain the ability of these resources to fully access the grid.

a. **Physical Changes to Craig Unit 1**

Bringing Craig Unit 1 back into service has already required modifications to the physical infrastructure on the site, beginning with repairs to Craig Unit 1's failed

Main Steam Stop Valves #1 and #2, and including additional maintenance to the unit's baghouse that had previously been deferred based on the unit's planned December 31, 2025 retirement. Petitioners must also perform emissions testing and other evaluations to ensure that Craig Unit 1 complies with applicable environmental requirements to the "maximum extent feasible while operating consistent with the emergency conditions." Order No. 202-25-14 at 4. Ongoing operations at the site will also require continual maintenance and staffing readiness, with the potential for further equipment failures that require repair and staffing (including overtime). And long before Craig Unit 1 was scheduled to retire, Petitioners both engaged in careful resource planning resulting in generation portfolios for the future that meet all member/customer needs, as well as planning reserve margins necessary to ensure reliable capacity in the event of extreme weather events and other emergencies, all based on the assumption that Craig Unit 1 would retire from service on December 31, 2025.

Compelling a property owner to make improvements to their property constitutes a physical taking when the mandated improvement benefits others—particularly the public at large—but do not benefit the property owner. "Put in general terms, government may not force a landowner to make an improvement that, while valuable to others, is useless to him" without it constituting a compensable taking. *Furey v. City of Sacramento*, 780 F.2d 1448, 1454 (9th Cir. 1986) (citing *Norwood v. Baker*, 172 U.S. 269 (1898) and *Myles Salt Co. v. Bd. of Comm'rs*, 239 U.S. 478 (1916)), *abrogated on other grounds*, *Cumbre Inc. v. State Compensation*

Ins. Fund, 403 F. App'x 272 (9th Cir. 2010). The Order requires Petitioners to make significant repairs to a facility they had planned to imminently retire for good. This is the kind of taking described in *Furey*.

b. The Craig Facility's Fuel Reserve

All three Craig Units were designed to run on coal obtained from the now-shuttered Colowyo Mine and the soon-to-be-shuttered Trapper Mine.¹⁷ Before closing the Colowyo Mine, Tri-State stockpiled sufficient reserves to operate its share of the Craig Units until their respective retirements. The only practical source of fuel for Craig Unit 1 to maintain readiness after its planned retirement, and to make use of in the event of a dispatch, are Craig Units 2 and/or 3's previously acquired and allocated reserves.¹⁸

This too constitutes a taking. *See Horne*, 576 U.S. at 357–65 (USDA requirement that a percentage of a grower's crop be set aside for public use constituted a *per se* physical taking). Just as the government in *Horne* effected a *per se* taking by requiring raisin growers to surrender a specific, identifiable portion of their crop for public use, by mandating that Petitioners consume coal inventory purchased and reserved for Craig Units 2 and/or 3, DOE appropriates that property for a public reliability objective. Under *Horne's* reasoning, forced depletion of a

¹⁷ Tri-State believes that co-owners supply their share of Craig Units 1 and 2 through Trapper or other mines.

¹⁸ The diversion of this coal will necessitate future purchases of replacement fuel at uncertain cost, thereby imposing an additional, uncompensated expenditure that independently constitutes a taking. Use of an alternative source of supply not only results in additional costs, but also requires Tri-State to negotiate new contracts and alter operations at the Craig facility to account for variances between the physical qualities of different coal supplies.

utility's fuel reserves—no less than forced surrender of raisins—constitutes a physical taking of personal property requiring just compensation.

c. Axial Basin

The 145 MW Axial Basin generating facility is in the same general location as the Craig Generating Station and relies on much of the same transmission infrastructure. There is insufficient transmission capacity to move all electricity generated by the three Craig units and Axial Basin to the broader power grid. The Order thus constitutes appropriation of Tri-State's transmission infrastructure, a clear physical intrusion. This transmission limitation could lead to further physical intrusion by potentially forcing the curtailment of one or more of the other generation facilities to ensure that there was sufficient transmission capacity available for Unit 1 to comply with the Order.

B. DOE's Order Constitutes a Regulatory Taking

In addition to being a *per se* physical taking, the Order constitutes a regulatory taking. Regulatory takings occur where the government "imposes regulations that restrict an owner's ability to use his own property" but goes too far. *Cedar Point Nursery*, 594 U.S. at 148. The property rights implicated by the Takings Clause can include contract rights, *see Lynch v. United States*, 292 U.S. 571, 579 (1934), and government-created entitlements with economic value, *Ruckelshaus v. Monsanto Co.*, 467 U.S. 986 (1984) (trade secrets constituted property for takings purposes). When evaluating whether a regulatory burden constitutes a taking, courts look to the test established in *Penn Central Transportation Co. v. New York City*, 438 U.S. 104, 124 (1982), which evaluates regulatory takings based on: (1) the regulation's economic

impact; (2) its interference with reasonable investment-backed expectations; and (3) the character of the government action.

The Order constitutes a regulatory taking under this analysis. The Order levies substantial economic impacts on Petitioners through both direct maintenance costs and the disruption to Petitioners' planning with associated downstream costs. The Order also disrupts Petitioners' reasonable investment-backed expectations rooted in years-long resource and economic planning, and interferes with Petitioners' operations and their contractual and regulatory rights.

1. Economic Impact

In requiring Petitioners to "take all measures necessary to ensure that Craig Unit 1 is available to operate," the Order places a heavy economic burden on Petitioners. As discussed above, Petitioners will necessarily incur a variety of operations and maintenance costs to ensure that Craig Unit 1 is ready and able to operate on request, with no economic benefit available from retaining the to-be-retired facility because it is uneconomic to operate.

Moreover, because of limited capacity over common transmission facilities, dispatching Craig Unit 1, while the other Craig Units are operating, can impede Tri-State's ability to dispatch its nearby Axial Basin generating facility. This in turn, prevents Petitioners from gaining the benefit of a margin on more economic resources, including renewable energy credits (which themselves have tangible value). *See Ruckelshaus*, 467 U.S. at 1011 (trade secrets are property); *Cienega Gardens v. United States*, 331 F.3d 1319, 1329 (Fed. Cir. 2003) (option rights to prepay subsidized mortgage and exit affordable-housing program are property); *Casitas*

Mun. Water Dist. v. United States, 543 F.3d 1276, 1288–96 (Fed. Cir. 2008) (water capacity rights are property). Forced operations would prevent Petitioners from most efficiently and affordably managing the transmission and generation system.

2. Investment-Backed Expectations

“The regulatory regime in place at the time the claimant acquires the property at issue helps to shape the reasonableness of [investment-backed] expectations.” *Palazzolo v. Rhode Island*, 533 U.S. 606, 633 (2001) (O’Connor, J., concurring). Where a change in regulation dramatically disrupts the economic basis for a property owner’s choices, it constitutes unreasonable interference with reasonable investment-backed expectations. *See Petworth Holdings, LLC v. Bowser*, 3d 347, 356–58 (D.C. Cir. 2018). An explicit government guarantee forms the basis of a reasonable investment-backed expectation. *See Ruckelshaus*, 467 U.S. at 1011.

The Order disrupts Petitioners’ reasonable investment-backed expectations on several fronts. DOE’s use of Section 202(c) authority to address long-term predicted shortages or grid reliability problems is a substantial and novel change to prior uses of Section 202(c) emergency authority.¹⁹ The Order fundamentally alters DOE’s longstanding approach in a novel, untested way that could not be predicted from DOE’s actions until recently, a decade after Craig Unit 1’s 2025 retirement was announced. Petitioners could not have fairly anticipated DOE’s novel approach to Section 202(c) when it engaged in business planning and made investment decisions; thus, the Order upsets Petitioners’ reasonable expectations.

¹⁹ *Rolsma* (2024) at 802–09, 839–46 (discussing paucity of involuntary Section 202(c) orders since WW2).

Moreover, diverting coal from Craig Unit 1 to comply with the Order depletes Craig Unit 2 and 3's fuel reserves and hinders Petitioners' right and ability to freely use those facilities consistent with their investment-backed expectations. The Order also upsets Petitioners' delicate contractual relationships. Even if Section 202(c) provides protection from enforcement action by Colorado under "environmental" laws,²⁰ disruption to these longstanding relationships disturbs Petitioners' ability to manage risk, engage in long-term planning, and maintain their reputations as reliable counterparties. Notwithstanding possible regulatory action, Petitioners have made commitments to stakeholders and planned their businesses around complying with existing environmental laws, which form part of their investment-backed expectations.

Finally, the electrical generation and transmission industry operates on a long time horizon. Craig Unit 1's closure was announced a decade ago, and numerous steps, such as deferring maintenance, reducing staffing, and redirecting capital expenditures, have been undertaken since. As is best practice, Petitioners engaged in extensive long-term planning with both government and private-sector partners, and Petitioners' plan to close Craig Unit 1 is part of a long-term plan to retire Unit 1 for economic reasons. Disruption of these long-term plans through a shorter-term Order upsets Petitioners' reasonable investment-backed expectations.

²⁰ Section 202(c)(3) does not define "environmental law" in this context and the scope of that term is untested.

3. Character of the Taking

The character of a governmental action is defined by “the purpose and importance of the public interest underlying [the] regulatory imposition, by obligating the court to inquire into the degree of harm created by the claimant’s prohibited activity, its social value and location, and the ease with which any harm stemming from it could be prevented.” *Maritrans, Inc. v. United States*, 342 F.3d 1344, 1356 (Fed. Cir. 2003) (internal quotation and citation omitted). “A ‘taking’ may more readily be found when the interference with property can be characterized as a physical invasion by government . . . than when interference arises from some public program adjusting the benefits and burdens of economic life to promote the common good.” *Penn Central*, 438 U.S. at 124 (citations omitted).

The character of the Order’s action further strengthens the case for a regulatory taking. As discussed in Section (I)(A), the Order effectively commandeers Craig Unit 1, its fuel, the potential dispatch of the nearby Axial Basin facility, and related infrastructure owned by Petitioners. The Order does not merely adjust the benefits and burdens of economic life, but rather directs operational control for a public reliability aim that could—and should—be solved through other means, and by other electrical utilities.

C. Just Compensation

The Takings Clause provides that “private property [shall not] be taken for public use, without just compensation.” U.S. Const. amend. V. Whether compensation is “just” is measured by relation “both to an owner whose property is taken and to the public that must pay the bill[.]” *United States v. Commodities Trading Corp.*, 339

U.S. 121, 123 (1950). “The owner’s loss is measured by the extent to which governmental action has deprived him of an interest in property.” *Wheeler v. City of Pleasant Grove*, 833 F.2d 267, 270 (11th Cir. 1987).

There is no established process by which Petitioners will obtain government compensation for losses relating to the Order. Section 202(c) and its implementing regulations, namely 10 C.F.R. 205.376, suggest recovery through FERC rate-making processes, but nowhere does the Order guarantee Petitioners’ complete recovery.²¹ As one example of the complexity of this undertaking, WAPA and the Bonneville Power Administration, as Federal Power Marketing Administrations located within WECC-NW, are exempt from most FERC jurisdiction.²² It is not immediately clear how the FERC rate-making process could be used to secure cost recovery from utilities serving areas located within the scope of the emergency but over which FERC lacks jurisdiction.

Moreover, even if Petitioners can and do recover some costs through this process, it is still not *just compensation* within the meaning of the Takings Clause. The duty to pay compensation for a taking runs to the government—“a takings claim requires just compensation from the government, not from a private third party.” *See*

²¹ Additionally, the terms of the Order could have substantive impact on Tri-State’s ability to make energy sales at market-based rates through authority granted to it by FERC. *See, e.g., Tri-State Generation and Transmission Ass’n*, 170 FERC ¶ 61,220, at PP 1, 22 and ordering para. (A) (2020) (generally providing Tri-State with authorization to transact at market-based rates). The circumstances are analogous for Platte River. Platte River also makes energy sales at market rates, but, as a government utility exempt under FPA Section 201(f), Platte River does not need market-based rate authority from FERC.

²² Stating that “[n]o provision in this subchapter shall apply to, or be deemed to include, the United States.” 16 U.S.C. § 824(f) (2024).

Deutsche Bank Nat'l Trust Co. v. SFR Invests. Pool 1, LLC, Case No. 2:14-cv-001131-APG-VCF, 2016 WL 1248704, at *5 (D. Nev. Mar. 28, 2016); *see also Baker v. City of McKinney*, 608 F. Supp. 3d 457, 465–67 (E.D. Tex. 2022) (plaintiff was entitled to full compensation for a taking by police even though she obtained additional money from donations). This is particularly true where, as here, at least some of Petitioners' relief will come from Tri-State's members and Platte River's ratepayers, even if FERC orders some level of cost recovery. DOE cannot simply transfer the constitutional obligation to provide just compensation onto private parties—including, here, rural communities and the residents of four small Colorado municipalities—through regulatory mandates without satisfying its own Takings Clause obligations.

II. THE ORDER DISRUPTS PETITIONERS' RELIABILITY PLAN AND FAILS TO ACCOUNT FOR VIABLE ALTERNATIVES

Separate from whether DOE must compensate Petitioners for the impact of the Order on their property and operations, the Order suffers from statutory and constitutional frailties. While Petitioners share DOE's goal of ensuring that the Northwestern United States has reliable and affordable electricity, the Order misses the mark.

First, the Order violates Petitioners' constitutional due process rights to pre-deprivation notice and a hearing. While emergencies sometimes allow the government to provide only post-deprivation process, the government must do more than reference the word “emergency”—rather, it must show that the *kind* of emergency that requires such fast-moving action has occurred. The Order's asserted

emergency is no such emergency. And the Order disrupts a considered resource planning effort.

Second, the Order does not meet the requirements of Section 202(c). It does not consider reasonable alternatives as required by Section 202(c), including Petitioners' carefully calibrated reliability planning, using both thermal and renewable resources based on findings including from objective, industry-leading forecasting methods. *Third*, the Order is inconsistent with the FPA's objectives. The Order is, therefore, contrary to law and arbitrary and capricious.²³

A more deliberative process would, on the whole, work better to address DOE's concerns about the reliability of the electrical grid in the northwestern United States, and, in particular, the Mountain West. Petitioners stand ready to work with DOE to make their service area as reliable as possible and best serve their members and customers, doing so in a manner that is economically efficient.

A. The Order Violates Petitioners' Constitutional Due Process Rights and Disrupts Carefully Considered Reliability Planning

The Fifth Amendment's Due Process Clause guarantees that no person shall be "deprived of life, liberty or property" by the federal government "without due

²³ As DOE is aware, Petitioners have already taken and will continue to take steps to comply with the Order. This includes incurring compensable costs and expenses. Although Petitioners take the position that the Order does not comply with the requirements of Section 202(c), Petitioners are nonetheless entitled to cost recovery under Section 202(c) and as a compensable taking even if the Order is determined to be unlawful. Petitioners note that Section 202(c) is an emergency provision, and, for that reason, recovery pursuant to its terms should not turn on an ultimate determination of the lawfulness of the Order. Further, the Order provided notice to all potential ratepayers that rights to recovery would accrue to Petitioners (and the other co-owners) beginning on December 30, 2025. To bar Petitioners from recovering these already-incurred costs would be inconsistent with Section 202(c)'s purpose to respond to emergency conditions. Petitioners' position is based on currently available facts and information. Petitioners reserve all rights.

process of law.” U.S. Const. amend. V. At its core, due process requires notice and an opportunity to be heard before the government takes action affecting protected interests. *Memphis Light, Gas & Water Division v. Craft*, 436 U.S. 1, 19 (1978). This principle applies across regulatory regimes where hearings are generally required before agencies impose obligations or alter rights. Under the FPA, most Commission (*i.e.*, FERC or DOE) actions—such as rate changes or interconnection orders—cannot take effect without a prior hearing. *See generally* 16 U.S.C. §§ 824a(b), 824a(e), 824a-1(a), 824a-3(f), 824a-4, 824b(a)(4), 824c(b), 824d, 824e, 824f, 824i(b), 824j, 824j-1, 824k, 824m, 824o, & 824p.

Section 202(c) orders are unusual in that they may be issued without any prior hearing, reflecting their purpose as an emergency tool meant to address fast-moving and unexpected situations. *Indus. Park Dev. Co. v. EPA*, 604 F. Supp. 1136, 1142 (E.D. Pa. 1985) (“[A]dministrative deprivation of [a] property interest violates the Constitution’s due process guarantees except in very narrowly circumscribed emergency situations.”). However, “[t]here is a relation between the kind of emergency and nature of the solution.” *Pa. Gas & Water Co.*, 427 F.2d at 577. Where, as here, the declared emergency does not involve immediate and concrete concerns (potentially in 2029 if new generation is not built as planned), a hearing is certainly feasible, and, absent a hearing, Petitioners are deprived of their right to due process. *See Indus. Park Dev. Co.*, 604 F. Supp. at 1145 (holding that “[u]nilateral administrative action . . . should be saved for cases of extreme emergency”); *Miller*,

945 F.2d at 353 (emergency insufficient to avoid need for pre-deprivation hearing, but concluding that sufficient hearing had occurred).

The Order’s emergency does not rest on an urgent and immediate need for additional generation to address a specific incident or event, such as unusually extreme weather or another plant’s sudden unplanned outage. Rather, the emergency articulated by the Order is based on broader concerns about the sufficiency of generation capacity and reliability in the WECC Northwest assessment area over time and in the future. Because the Order does not demonstrate an immediate crisis, it cannot justify dispensing with the pre-deprivation hearing requirement. Formal notice to the co-owners, moreover, was lacking. The Order’s imprecision on boundaries of the region at issue,²⁴ not only highlights the lack of immediate crisis, but also fails to give Petitioners proper notice of the precise contours of the emergency. Petitioners were, therefore, deprived of their constitutional right to notice and a hearing before the Order came into effect.

The effect of this deprivation is significant. Petitioners have carefully planned the retirement of the Craig facility—including Craig Units 2 and 3’s reliance on

²⁴ The Order relies on NERC’s 2024 LTRA, which discusses conditions throughout the sweeping and populous WECC Northwest assessment area—an area that includes “Colorado, Idaho, Montana, Oregon, Utah, Washington, and Wyoming and parts of California, Nebraska, Nevada, and South Dakota[.]” See N. Am. Elec. Reliability Corp., 2024 Long-Term Reliability Assessment, at 127 (corrected July 11, 2025), https://www.nerc.com/globalassets/our-work/assessments/2024-ltra_corrected_july_2025.pdf. However, NERC’s more recent and more targeted 2025–2026 Winter Reliability Assessment from November 2025 shows that the new WECC-Rocky Mountain region—redrawn to better reflect local conditions than the vast and heterogeneous old WECC-Northwest region—has more than enough power to meet immediate winter needs. See N. Am. Elec. Reliability Corp., 2025 Winter Reliability Assessment (Nov. 2025), https://www.nerc.com/globalassets/our-work/assessments/nerc_wra_2025.pdf. Craig Unit 1 and most of Petitioners’ service territory is located in the WECC-Rocky Mountain region.

stockpiled coal. Petitioners have also planned and invested to bring new generation online, such as the Axial Basin facility, to ensure reliability even as Craig Unit 1 is carefully retired. If the Order proceeds and Unit 1 runs, it deprives the other units of fuel. This undermines Petitioners' planning, imposes "reliability" costs on Tri-State's members and Platte River's ratepayers a second time, and disrupts the operation and economics of the other coal resources still operating. A more deliberative process with the required pre-deprivation hearing would have allowed Petitioners to work with DOE to address concerns about reliability and shape a more workable plan.

B. The Order Failed to Consider Reasonable Alternatives

DOE could have taken other steps to more effectively meet the energy emergency identified in the Order. Section 202(c) requires the Secretary to exercise "judgment" and select only those measures that "will *best* meet the emergency and serve the public interest." 16 U.S.C. § 824a(c)(1) (emphasis added). Implicit in this mandate is the recognition that alternatives be considered and ruled out. DOE should have conducted and disclosed an analysis showing why the path selected is the "best" course forward, particularly in light of the potential 2029 time-horizon of the asserted emergency. This is consistent with the emergency nature of the powers contained in Section 202(c), which should not be exercised where "alternatives offered a more confined solution" to the emergency at issue. *Pa. Gas & Water Co.* 427 F.2d at 577 (considering analogous powers under the Natural Gas Act); *see also Farmers Union Cent. Exchange, Inc. v. FERC*, 734 F.2d 1486, 1511 (D.C. Cir. 1984) ("It is well established that an agency has a duty to consider reasonable alternatives to its chosen policy, and to give a reasoned explanation for its rejection of such

alternatives.”) (citation and footnote omitted). The Order reflects no consideration of alternatives, let alone a case for mandating Craig Unit 1 remain active over other options, and is thus contrary to law and arbitrary and capricious.

Compelling Craig Unit 1 to remain available to operate after its planned retirement date must be the “best” measure to address this long-term reliability concern across the region described in the Order. “[R]easonable regulation ordinarily requires paying attention to the advantages and the disadvantages of agency decisions.” *Michigan v. EPA*, 576 U.S. 743, 753 (2015). This weighing process requires engagement with the factual record, as reflected in DOE regulations, which require applicants to provide extensive information related to operations and alternative courses of action.²⁵ These requirements reflect the understanding that Section 202(c) should only be used where unit-specific alternatives have been considered, applied, and deemed inadequate based on the facts on the ground. The record in this proceeding reflects that neither these facts nor any reasonable alternatives were considered in connection with the Order.

DOE’s need to consider alternatives, based on a clear factual record, is particularly important given Craig Unit 1’s status. Craig Unit 1 is an older, uneconomic unit. Due to its long-planned retirement, Craig Unit 1 has experienced years of prudently deferred maintenance, and therefore faces particularly high costs to restore and maintain operations compared to possible alternatives.

²⁵ See 10 C.F.R. § 205.373. The specified information includes “conservation or load reduction actions,” “efforts . . . to obtain additional power through voluntary means,” and “[a] listing of proposed sources and amounts of power necessary from each source to alleviate the emergency and a listing of any other ‘entities’ that may be directly affected by the requested order.” 10 C.F.R. § 205.373(g)–(i).

Further, the Order fails to consider how mandating Craig Unit 1’s continued operation interferes with Petitioners’ ability to invest in other generation capacity and therefore undermines the very ends that it purports to advance. For instance, the Axial Basin generating facility relies on the same transmission infrastructure as the Craig units. That infrastructure is already congested; if all three Craig units are operating, Craig Unit 1’s continued operation could interfere with the ability of new alternatives like Axial Basin to provide economic power to the grid.

A lawful exercise of the emergency powers contained in Section 202(c) required consideration of reasonable regulatory alternatives. For example, the Order does not explain why DOE or FERC could not proceed through the rulemaking process pursuant to section 403 of the Department of Energy Organization Act, 42 U.S.C. § 7173, to devise a plan to ensure reliability through a more fulsome, consultative process. Proceeding with a notice of proposed rulemaking for consideration and final action would have minimal short-term risks and is appropriate to the timeline of the described emergency, which, by DOE’s supporting evidence, is predicted to occur no earlier than “in Summer 2029 onward” (because “the Northwest shows a shortfall of existing-certain and net firm transfers, meaning that imports may be necessary if new resources were to be significantly delayed”).²⁶ Similarly, DOE could have evaluated whether it had authority to take proactive action to insure that “new resources” in the region are not “significantly delayed.”

²⁶ N. Am. Elec. Reliability Corp., 2024 Long-Term Reliability Assessment, at 128 (corrected July, 11 2025), https://www.nerc.com/globalassets/our-work/assessments/2024-ltra_corrected_july_2025.pdf.

In the absence of such consideration, and the disclosure of the relevant rationale, Petitioners and the public “cannot weigh the merits of an agency decision nor compare it to other alternative actions[.]” *Rocky Mountain Wild v. Bernhardt*, 506 F. Supp. 3d 1169, 1187 (D. Utah 2020). The Order does not discuss why Craig Unit 1’s continued operation was selected as the “best” solution to the described conditions, or if alternatives were considered, what those alternatives were, and why any considered alternatives were discarded. Thus, it was contrary to law and an arbitrary and capricious exercise of agency authority.

C. The Order is Inconsistent with the FPA’s Statutory Objectives

Courts reject agency action as arbitrary and capricious if it is “inconsistent with the statutory mandate” or “frustrate[s] the policy that Congress sought to implement.” *FEC v. Democratic Senatorial Campaign Comm.*, 454 U.S. 27, 32 (1981). The FPA was passed to advance a variety of policy goals, including protecting consumers from “excessive rates and charges,” *Xcel Energy Servs. Inc. v. FERC*, 815 F.3d 947, 952 (D.C. Cir. 2016) (citation omitted); “maintaining competition to the maximum extent possible[.]” *Otter Tail Power Co. v. United States*, 410 U.S. 366, 374 (1973); and encouraging the “orderly development of plentiful supplies of electricity . . . at reasonable prices.” *NAACP v. FPC*, 425 U.S. 662, 670 (1976).²⁷

²⁷ “Recognizing the careful balance that the FPA strikes between federal and state regulation” FERC recently found that “states retain exclusive authority over . . . the generation mix.” *PJM Interconnection, L.L.C.*, 193 FERC ¶ 61217, at P165 (Dec. 18, 2025). Long-term economic and planning decisions regarding Tri-State’s resource mix had been approved by the State of Colorado through the 2020 and 2023 Energy Resource Plans. This jurisdictional division of responsibility and federal respect for state policymaking is also a policy of the FPA. See *Sierra Club v. FERC*, 145 F.4th 74, 81 (D.C. Cir. 2024) (respecting the role of state regulators); *NextEra Energy Resources, LLC v. FERC*, 118 F.4th 361, 365 (D.C. Cir. 2024) (“[FERC] may regulate the transmission, but not the generation, of electricity[.]”).

The Order, by compelling an uneconomic unit to remain operational on the eve of its retirement, upends Petitioners' ability to plan their systems in an orderly fashion and to act with confidence in a competitive marketplace. Because the Order is at odds with the statutory objectives of the FPA, it is arbitrary and capricious.

CONCLUSION

Tri-State is a not-for-profit, member-owned cooperative and Platte River is a not-for-profit municipally owned joint action agency. Both utilities aim to work with government at all levels to best serve the communities to which they provide reliable and affordable energy. In that light, Tri-State has taken the steps necessary to plan for a reliable system that would have a planning reserve margin of at least 22% even with the retirement of Craig Unit 1, for which its Utility Members have paid. Platte River has likewise proactively developed resources that more than replace Craig Unit 1's energy and capacity to reliably serve its owner communities and meet the planning reserve margins SPP requires for its expanded western footprint (19% for summer; 40% for winter), and for which its owner communities have already paid.

The Order effects an uncompensated taking of Petitioners' property, denies them due process, and fails to meet Section 202(c)'s statutory requirement that DOE's chosen policy rationally "best address[es]" the stated emergency. Requiring Petitioners—not all of whom are located in the WECC Northwest region described by the Order—to suffer additional costs *and* uncertainty because of potential conditions created by utilities outside Petitioners' service area, is fundamentally unfair and harms affordability. Petitioners urge DOE to reconsider the Order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties below. Dated at Washington, D.C., this 29th day of January 2026.

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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-176
Xcel Motion to Intervene in Petition for Rehearing

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

	)	
State of Colorado,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case Nos. 26-1059
	)	26-1060
United States Department of	)	
Energy and Chris Wright,	)	(Consolidated)
Administrator, United	)	
States Department of	)	
Energy,¹	)	
	)	
Respondents.	)	
	)	

**MOTION FOR LEAVE TO INTERVENE OF
PUBLIC SERVICE COMPANY OF COLORADO**

Public Service Company of Colorado (“Public Service”) respectfully moves for leave to intervene in the consolidated petitions for review filed by the State of Colorado and by the Sierra Club, Vote Solar, and the Environmental Defense Fund (collectively, “Petitioners”) in the above-captioned proceedings. Public Service is the object of the agency actions that the Petitioners challenge and seeks leave to intervene to protect its

¹ The case caption refers to the Secretary of the Department of Energy as “Administrator.”

interests. At present, Public Service does not support or oppose either side. Accordingly, Public Service respectfully requests that it be permitted to file a brief with or after Respondent Department of Energy (“Department”).

In support of this motion, Public Service states the following:

Public Service is a wholly owned subsidiary of Xcel Energy Inc. and is a combination gas and electric utility serving various geographic areas in Colorado. Public Service provides (i) natural gas local distribution service to approximately 1.4 million residential, commercial, and industrial customers in northern, central, southern, and western parts of Colorado; (ii) cost-based electric service to approximately 1.5 million retail customers in Colorado, subject to the jurisdiction of the Colorado Public Utilities Commission; and (iii) cost-based wholesale requirements service to five customers within Colorado, subject to the jurisdiction of the Federal Energy Regulatory Commission (“FERC”). Public Service is a co-owner of Craig Unit 1, a 446.4 MW coal-fired generator in Craig, Colorado, which is the subject of the orders challenge by Petitioners here.

On March 18, 2026, the State of Colorado (Case No. 26-1059) and the Sierra Club, Vote Solar, and the Environmental Defense Fund (Case

No. 26-1060) filed petitions for review of the following orders issued by the Department:

1. Federal Power Act Section 202(c) Emergency Order for Craig Unit 1, DOE Order No. 202-25-14 (December 30, 2025); and
2. *Tri-State Generation and Transmission Association, Platte River Power Authority, Salt River Project, PacifiCorp, Xcel Energy Inc., Western Area Power Administration – Rocky Mountain Region, and Southwest Power Pool Regarding Craig Station*, DOE Order No. 202-25-14A (March 2, 2026).

The Department orders concern an electric generation facility partially owned by Public Service. On December 30, 2025, the Department issued Order No. 202-25-14 (“Craig 1 Order”), pursuant to Section 202(c) of the Federal Power Act, to the co-owners of Craig Unit 1—Tri-State Generation and Transmission Association (“Tri-State”), Platte River Power Authority, Salt River Project, PacifiCorp, and Xcel Energy.² (*Fed. Power Act § 202(c) Emergency Order for Craig Unit 1*, DOE Order No. 202-25-14 (Dec. 30, 2025)). The Craig 1 Order directs “Tri-State and the co-owners” to “take all measures necessary to ensure that Craig Unit 1 is available,” as well as to provide information regarding facility operations and environmental and operational impacts

² Public Service is the Xcel Energy Inc. operating company subsidiary that is the co-owner for Craig Unit 1.

of compliance. (*Id.* at 1, Ordering ¶ A). Although the co-owners had intended to cease operations at the end of December 2025, the Craig 1 Order requires the facility to remain available until at least March 30, 2026. (*Id.* at 1, Ordering ¶ H).

“There is ordinarily little question” that the “object of the government action” has standing in a case challenging the action. *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 561–562 (1992). Here, the Craig 1 Order has caused Public Service and other co-owners to incur substantial additional operations, maintenance, and fuel costs. For these evident reasons, Public Service has a direct and substantial interest in these proceedings—at a minimum, its concrete interest in recovering costs of compliance with the Department’s order ensuring that these petitions do not impair Public Service’s ability to recover its costs.³

At this time, Public Service expects to take no position on the legality of the Department’s order, including whether it should be upheld

³ This interest demonstrates an injury-in-fact to a legally protected interest, causation, and redressability sufficient to establish Article III standing. *Cf. Fund for Animals, Inc. v. Norton*, 322 F.3d 728, 732–33 (D.C. Cir. 2003); *Institutional S’holder Servs., Inc. v. SEC*, 142 F.4th 757, 764 & n.3 (D.C. Cir. 2025) (noting that intervenors seeking the same relief as an existing party need not establish independent standing under Supreme Court precedent).

or set aside on the merits. Public Service seeks leave to intervene to protect its interests and respond to arguments that relate to Public Service's ability to assign, allocate, and recover costs. Public Service has incurred and will continue to incur substantial costs to comply with the Department's order. Public Service estimates that its share of the costs to comply with the Department's order has been approximately \$100,000.⁴ Neither Petitioners, the Department, nor the other co-owners can adequately represent Public Service's interests in cost assignment or allocation.

Public Service's intervention is supported by *Michigan v. Department of Energy*. *Michigan* involves another recent Department order under Section 202(c) and even involves some of the same Petitioners as are in this proceeding. (See Br. for Pet. in *Michigan v. Dep't of Energy*, D.C. Cir. Case No. 25-1159 (filed Dec. 19, 2025)). In *Michigan*, the affected utility did not take a position on the legality of the Department's order and had originally intended to participate only as an amicus. However, after the petitioners' opening brief raised cost recovery

⁴ The estimate is subject to change because final costs are still being determined.

issues, the utility moved out-of-time to intervene to defend its interests. (See Mot. of Consumers Energy Co. for Leave to Intervene & for Extension of Time in *Michigan*, D.C. Cir. Case No. 25-1159 (filed Dec. 26, 2025)). Owing to the substantial stakes for that utility, the Court granted the utility's out-of-time motion and permitted it to file a brief with the respondent-intervenors. (See *id.* at 2-3, 10; Order in *Michigan*, D.C. Cir. Case No. 25-1159 (Feb. 5, 2026) (granting intervention) (“*Michigan Intervention Order*”)).

Public Service is in the same basic position as the *Michigan* utility in that it intends to participate to defend its ability to recover costs, if that issue arises, and does not intend to take any position on the legality of the Department's Order. The only difference here is that, unlike the utility subject to an equivalent order in the *Michigan* case, Public Service is moving to intervene at the outset rather than assuming a wait-and-see approach that risks the need for an out-of-time motion.

The Court should grant Public Service leave to intervene in support of neither party and file its brief with or after the respondent's brief.

Respectfully submitted,

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Counsel for Public Service

Company of Colorado

Dated: April 9, 2026

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

	)	
State of Colorado,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	
United States Department of	)	Case Nos. 26-1059
Energy and Chris Wright,	)	26-1060
Secretary, United States	)	
Department of Energy,⁵	)	(Consolidated)
	)	
Respondents.	)	
	)	

**CORPORATE DISCLOSURE STATEMENT OF
PUBLIC SERVICE COMPANY OF COLORADO**

In accordance with Rule 26.1 of the Federal Rules of Appellate Procedure and Rule 26.1 of the Rules of this Court, Public Service Company of Colorado (“Public Service”) provides the following disclosure statement:

Public Service is a combination gas and electric utility incorporated in Colorado that serves various geographic areas in the State of Colorado.

⁵ The case caption refers to the Secretary of the Department of Energy as “Administrator.”

Public Service is a wholly owned utility subsidiary of Xcel Energy Inc. (“Xcel Energy”). There are no other parent corporations or publicly held companies that own a 10% or greater ownership interest in Public Service. Public Service’s principal place of business is 1800 Larimer Street, Suite 1100, Denver, CO 80202.

Xcel Energy is a Minnesota corporation and a holding company under the Public Utility Holding Company Act of 2005. Xcel Energy’s principal place of business is 414 Nicollet Mall, Minneapolis, Minnesota 55401. Xcel Energy is a publicly traded company on the NASDAQ under the symbol “XEL.” The Vanguard Group, Inc. is the only entity that owns a 10% or greater ownership interest in Xcel Energy. No affiliate of Public Service, other than Xcel Energy, has issued shares to the public.⁶

⁶ Certain operating company subsidiaries of Xcel Energy have issued first mortgage bonds and other debt securities that are publicly traded, including Southwestern Public Service Company; Northern States Power Company, a Minnesota corporation; Northern States Power Company, a Wisconsin corporation; and PSCo. A complete list of all debt securities of Xcel Energy and its subsidiaries is available at the Xcel Energy website (www.xcelenergy.com) under “Investors.”

Respectfully submitted,

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Dated: April 9, 2026

CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMIT

I hereby certify that this motion complies with the type-volume limitation, the typeface requirements, and type-style requirements in Rules 27(d)(2)(A), 32(a)(5), and 32(a)(6) of the Federal Rules of Appellate Procedure because this motion contains 1,069 words and was prepared in a proportionally spaced typeface using Microsoft® Word for Microsoft 365 MSO in Century Schoolbook 14-point font.

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Dated: April 9, 2026

CERTIFICATE OF SERVICE

Pursuant to Rules 15(d) and 25(d) of the Federal Rules of Appellate Procedure and Circuit Rule 25, I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the D.C. Circuit by using the appellate CM/ECF system. Participants in these cases will be served by email through the Court's CM/ECF system.

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Dated: April 9, 2026

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-177
March 30, 2026 Colorado Sun Article

NEWS: CLIMATE, ENERGY, ENVIRONMENT, NEWS

Life of coal burning Craig Unit 1 extended again by Trump administration

Against the wishes of its owner and many others, Department of Energy says plant is needed to generate electricity to cover emergencies, growing demand



Michael Booth

3:50 PM MDT on Mar 30, 2026



The Queen Anne dragline, with the Tri State Craig Station power plant in the background, is shown operating at the Trapper Mine in Craig, Colo., Sept. 27, 2006. (AP Photo/Denver Post, Brian Brainerd)

The Trump administration's Department of Energy on Monday extended its emergency order keeping coal-burning Craig Unit 1 open against the wishes of its

owners as well as Colorado regulators and environmental advocates.

The plant, scheduled for a Dec. 31 permanent shutdown by Tri-State Generation and Transmission **long before the first Trump emergency order**, will now stay open and available to bolster Western power supplies through at least June, the order says.

Colorado Attorney General Phil Weiser and other states are **challenging the coal plant extensions in federal court**, but have not yet won reversals. Opponents of the extensions renewed their criticism, calling coal power needlessly costly and dangerous to the health of Colorado residents.

“The Trump administration has doubled down on an order that no one seems to want except the coal industry,” said Leslie Coleman, senior attorney with Earthjustice’s Rocky Mountain Office. “Craig’s co-owners have had to pour money into this aging and unreliable unit to keep it available, and those costs are likely to be passed on to Coloradans. It is time for the administration to stand down and allow this unit to retire as utilities and state regulators had long planned.”

Tri-State Generation, a power-supplying co-op that co-owns the northwestern Colorado unit, has said it completed repairs earlier this year and the plant has been available to respond to demand orders from regional power coordinators. But the plant still hadn’t been called on for actual power as of Monday, said Tri-State officials, who are reviewing the new order.

Tri-State and environmental groups have said the federal orders have not offered any information about who will pay to keep Craig 1 operating, **which could cost more than \$80 million over a year**.

“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,” according to the order by Secretary of Energy Chris Wright. “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.”

Colorado clean energy officials and advocates counter that Craig’s power is not needed, and that the state had planned carefully for years to make sure cleaner sources came online while state rules required retirement of the last six coal plants by 2030. Colorado says it needs the coal plants to close to meet a number of clean air goals, including an 80% reduction in greenhouse gas emissions from the power sector by 2030.

Instead, Colorado’s life as a coal state keeps getting extended. In addition to the Craig order, Xcel has been allowed to extend the life of the Comanche 2 unit in Pueblo while it completes repairs on the damaged Comanche 3. Colorado Spring Utilities, meanwhile, is asking the state for permission to keep burning coal at its Ray D. Nixon plant in Fountain past the previously scheduled closing in 2029, while it builds replacement power.

The Craig Station owners have also noted the double-whammy they face with the unit's coal energy: There's only so much transmission capacity in northwestern Colorado, and if they have to force coal power out onto the lines, they won't be able to use solar electricity generated by the newly added **145MW Axial Basin solar farm in Moffat County**.

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-178
NERC 2025 Long-Term Reliability Assessment

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Long-Term Reliability Assessment

January 2026



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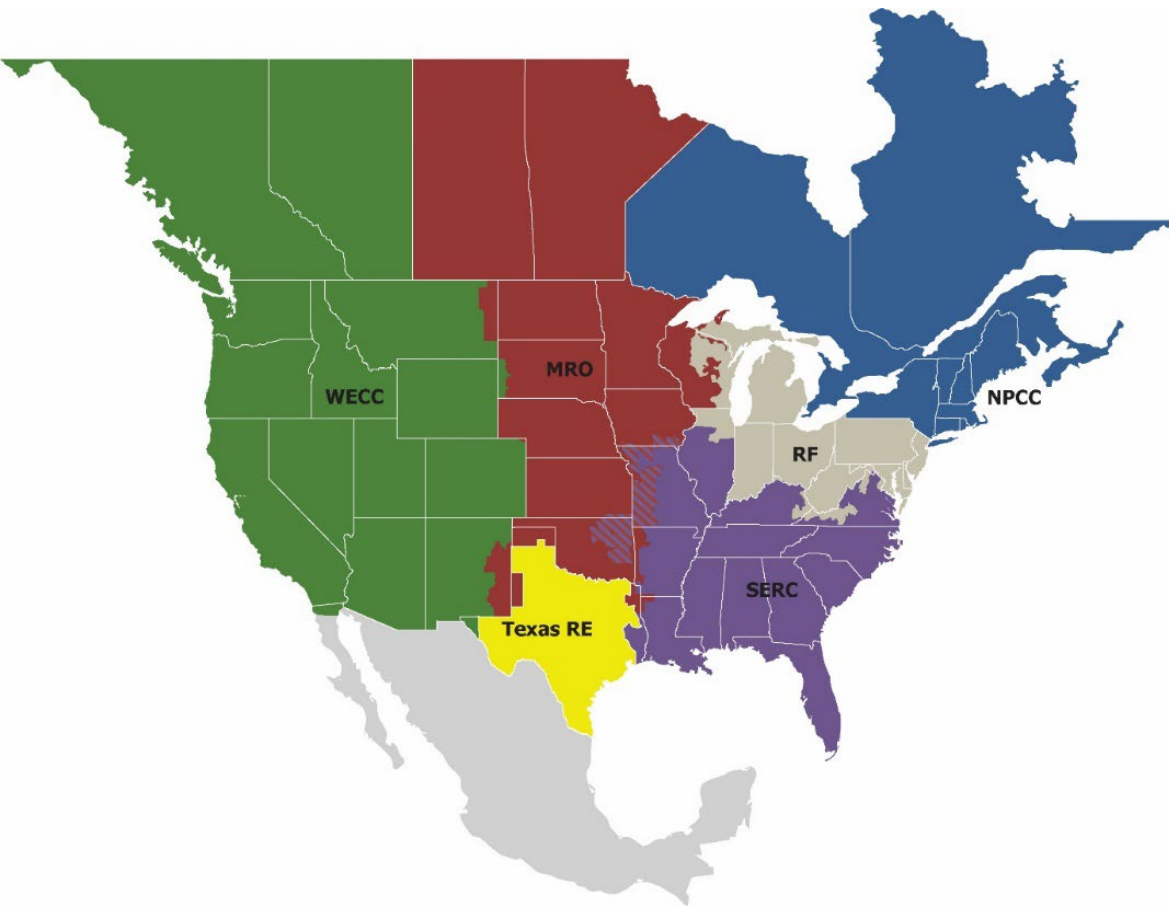
Preface

Electricity is a key component of the fabric of modern society and the Electric Reliability Organization (ERO) Enterprise serves to strengthen that fabric. The vision for the ERO Enterprise, which is comprised of NERC and the six Regional Entities, is a highly reliable, resilient, and secure North American bulk power system (BPS). Our mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.

Reliability | Resilience | Security

Because nearly 400 million citizens in North America are counting on us

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 Assessment

NERC is a not-for-profit international regulatory authority with the mission to assure the reliability of the BPS in North America. NERC develops and enforces Reliability Standards; annually assesses seasonal and long-term reliability; monitors the BPS through system awareness; and educates, trains, and certifies industry personnel. NERC’s area of responsibility spans the continental United States, Canada, and the northern portion of Baja California, Mexico. NERC is the ERO for North America and is subject to oversight by the U.S. Federal Energy Regulatory Commission (FERC, also known as the Commission) and governmental authorities in Canada. NERC’s jurisdiction includes users, owners, and operators of the North American BPS and serves more than 334 million people. Section 39.11(b) of FERC’s regulations provides that “The Electric Reliability Organization shall conduct assessments of the adequacy of the Bulk-Power System in North America and report its findings to the Commission, the Secretary of Energy, each Regional Entity, and each Regional Advisory Body annually or more frequently if so ordered by the Commission.”

The *Long-Term Reliability Assessment* (LTRA), along with NERC’s other reliability assessments and analysis reports, supports the ERO Enterprise vision and mission by providing independent analysis of reliability risks. Other important assessments and reports include the following:

- **Seasonal Reliability Assessments:** The [Summer Reliability Assessment](#) (SRA) and [Winter Reliability Assessment](#) (WRA) provide overall perspective on the adequacy of the generation resources and the transmission systems necessary to meet projected seasonal peak demands. They also identify reliability issues of interest and areas of concern for the upcoming season. Seasonal assessments are published annually prior to each respective season.
- **Special Reliability Assessments:** In addition to the long-term and seasonal reliability assessments, NERC also conducts [special reliability assessments](#) on a regional, interregional, and Interconnection basis as conditions warrant, or as requested by the NERC Board of Trustees or governmental authorities. Special reliability assessments are performed and published on an as-needed basis.
- **State of Reliability Report (SOR):** The [SOR](#) contains an unbiased, data-driven look at BPS reliability for the calendar year, identifying ongoing challenges and informing future-looking reliability assessments. It seeks to inform regulators, policymakers, and industry leaders of the most significant reliability risks facing the BPS and describe the actions that the ERO

Enterprise has taken, and will take, to address them. The SOR is published annually, containing analysis of BPS performance data from the prior year.

- **Event Analysis Reports:** NERC publishes reports of major system events and off-normal system occurrences as one output of the [ERO Event Analysis Program](#). This program employs rigorous post-event analysis and promotes broad understanding of the causes and effects of reliability events. NERC also publishes Lessons Learned for industry.

Reliability assessments and analysis are published on NERC’s [website](#).

Development Process

This assessment was developed based on data and narrative information NERC collected from the six Regional Entities (see [Preface](#)) on an assessment area basis (see [Regional Assessments Dashboards](#)) to independently evaluate the long-term reliability of the North American BPS while identifying trends, emerging issues, and potential risks during the upcoming 10-year assessment period. The [Reliability Assessment Subcommittee](#) (RAS), at the direction of NERC’s [Reliability and Security Technical Committee](#) (RSTC), supported the development of this assessment through a comprehensive and transparent peer-review process that leverages the knowledge and experience of system planners, RAS members, NERC staff, and other subject matter experts; this peer-review process ensures the accuracy and completeness of all data and information. This assessment was also reviewed by the RSTC, and the NERC Board of Trustees subsequently accepted this assessment and endorsed the key findings.

NERC develops the LTRA annually in accordance with the ERO’s Rules of Procedure¹ and Title 18, § 39.11² of the Code of Federal Regulations;³ this is also required by Section 215(g) of the Federal Power Act, which instructs NERC to conduct periodic assessments of the North American BPS.⁴

¹ NERC Rules of Procedure - Section 803

² Section 39.11(b) of FERC’s regulations states the following: “The Electric Reliability Organization shall conduct assessments of the adequacy of the Bulk-Power System in North America and report its findings to the Commission, the Secretary of Energy, each Regional Entity, and each Regional Advisory Body annually or more frequently if so ordered by the Commission.”

³ Title 18, § 39.11 of the Code of Federal Regulations

⁴ BPS reliability, as defined in the [How NERC Defines BPS Reliability](#) section of this report, does not include the reliability of the lower-voltage distribution systems that account for 80% of all electricity supply interruptions to end-use customers.

Considerations

This assessment was developed by using a consistent approach for projecting future resource adequacy through the application of the ERO Reliability Assessment Process.⁵ Projections in this assessment are not predictions of what will happen; they are based on information supplied in July 2025 about known system changes with updates incorporated prior to publication. This 2025 LTRA assessment period includes projections for 2026–2035; however, some figures and tables examine data and information for the 2025 year. NERC’s standardized data reporting and instructions were developed through stakeholder processes to promote data consistency across all the reporting entities that are further explained in the [Demand Assumptions and Resource Categories](#) section. Reliability impacts related to cyber and physical security risks are not specifically addressed in this assessment, which is primarily focused on resource adequacy and operating reliability. NERC leads a multifaceted approach through its Electricity Information Sharing and Analysis Center (E-ISAC) to promote mechanisms to address physical and cyber security risks, including exercises and information-sharing efforts with the electric industry and government partners.

The LTRA data used for this assessment creates a reference case dataset that includes projected on-peak demand and system energy needs, demand response (DR), resource capacity, and transmission projects. Data from each Regional Entity is also collected and used to identify notable trends and emerging issues. This bottom-up approach captures virtually all electricity supplied in the United States, Canada, and a portion of Baja California, Mexico. NERC’s reliability assessments are developed to inform industry, policymakers, and regulators as well as to aid NERC in achieving its mission to ensure the reliability of the North American BPS.

Assumptions

In this 2025 LTRA, the baseline information on future electricity supply and demand is based on several assumptions:⁶

- Supply and demand projections are based on industry forecasts that were submitted and validated in July 2025. Any subsequent demand forecast or resource plan changes may not be fully represented; however, updated data submitted throughout the report drafting time frame has been included where appropriate.
- Peak demand is based on average peak weather conditions and forecasted economic activity at the time of submittal. Weather variability is discussed in each Regional Entity’s self-assessment.

⁵ [ERO Reliability Assessment Process Document](#)

⁶ Forecasts cannot precisely predict the future. Instead, many forecasts report probabilities with a range of possible outcomes. For example, each regional demand projection is assumed to represent the expected midpoint of possible future outcomes. This means that a future year’s actual demand may deviate from the projection due to the inherent

- Generation and transmission equipment will perform at historical availability levels.
- Future generation and transmission facilities are commissioned and in service as planned, known planned outages take place as scheduled, and retirements take place as proposed.
- Demand reductions expected from dispatchable and controllable DR programs will yield the forecast results if they are called on.
- Other peak demand-side management programs, such as energy efficiency (EE) and price-responsive DR, are reflected in the forecasts of total internal demand.

Reading This Report

This report is compiled into two major parts:

1. **A reliability assessment of the North American BPS with the following goals:**
 - a. Evaluate industry preparations that are in place to meet projections and maintain reliability, with a special focus on adequacy in the first five years
 - b. Identify trends in demand, supply, reserve margins, and probabilistic resource adequacy metrics
 - c. Identify emerging reliability issues
 - d. Focus the industry, policymakers, and the general public’s attention on BPS reliability issues
 - e. Make recommendations based on an independent NERC reliability assessment process
2. **A regional reliability assessment that contains the following:**
 - a. A 10-year data dashboard
 - b. Summary assessments for each assessment area
 - c. A focus on specific issues identified through industry data and emerging issues
 - d. A description of regional planning processes and methods used to ensure reliability

variability of the key factors that drive electrical use, such as weather. In the case of the NERC regional projections, there is a 50% probability that actual demand will be higher than the forecast midpoint and a 50% probability that it will be lower (50/50 forecast).

Executive Summary

The overall resource adequacy outlook for the North American BPS is worsening: In the 2025 LTRA, NERC finds that 13 of 23 assessment areas face resource adequacy challenges over the next 10 years. Projections for resource and transmission growth lag what is needed to support new data centers and other large loads that drive escalating demand forecasts. Most new resources in development to come on-line in the next five years consist of battery storage and solar photovoltaic (PV), which are inverter-based and weather-dependent resources that increase the complexity of planning and operating a reliable grid. Meanwhile, more fossil-fired generator retirements loom in the next five years, reducing the amount of generation that has fuel on site and impacting the system’s ability to respond to spikes in demand. The continuing shift in the resource mix toward weather-dependent resources and less fuel diversity increases risks of supply shortfalls during winter months. As Resource Planners, market operators, and regulators grapple with steep increases in demand and swelling resource queues, they face more uncertainty, adding to the already-complex endeavor of planning for resource adequacy during this period of rapid grid transformation. To ensure there are sufficient resources for supplying electricity in the future and to reliably meet the growing electricity needs for North Americans, industry, regulators, and policymakers need to be vigilant for shifting projections, keep plans for deactivating existing generators flexible, expedite system development, and perform robust adequacy assessments of future scenarios. In addition, careful planning and broad cross-sector coordination will be needed to navigate a period of potentially strained electricity resources.

The findings presented here are vitally important to understanding the reliability risks to the North American BPS as it is currently planned and being influenced by government policies, regulations, consumer preferences, and economic factors. Summaries of the report sections are provided below.

Capacity and Energy Risk Assessment

The [Capacity and Energy Risk Assessment](#) section of this report identifies potential future electricity supply shortfalls under normal and extreme weather conditions based on current BPS planning forecasts. NERC’s evaluation of resource adequacy in the LTRA considers both the capacity of the resources and the capability of resources to convert inputs (e.g., fuel, wind, and solar irradiance) into electrical energy. NERC used a probabilistic assessment and a deterministic reserve margin analysis from the LTRA process to identify the risk of future electricity supply shortfall and determine a risk category for each assessment area based on consistent risk criteria.⁷ Risk assessment inputs are tied to industry forecasts of electricity supplies, demand, and transmission development, providing a forward-looking snapshot of resource adequacy.

⁷ In some cases, NERC modified the risk category when system studies performed by a system operator or regulator determine that resource adequacy target(s) will not be met. Details of the risk evaluation for each assessment area are in the [Capacity and Energy Risk Assessment](#).

Areas determined to be **High Risk** exceed the upper risk criteria levels. In high-risk areas, planned resources as of July 2025 would result in energy shortfalls that exceed resource adequacy targets or baseline criteria for unserved energy or loss of load.⁸ **Elevated-Risk** areas meet resource adequacy criteria, but planned resources are likely to result in energy shortfalls that are expected to be limited to more extreme weather conditions. More extreme conditions can include temperatures that result in above-normal demand levels, low resource output or availability, fuel supply disruptions, and limitations of normal electricity transfers. **Elevated-Risk** areas are identified in the LTRA when unserved energy and load loss metrics are below the **High-Risk** criteria but are not negligible. **Normal-Risk** areas are expected to have sufficient resources under a broad range of assessed conditions and are below the lowest risk criteria level. The results of the risk assessment are summarized for all elevated- and high-risk assessment areas in [Figure 1](#) and described in [Table 1](#).

⁸ The criteria used for risk determination in the LTRA include resource adequacy targets established by regulatory authorities, traditional 1-day-in-10 years load-loss criteria, and probabilistic loss-of-load-hour and expected unserved energy metrics. See [Risk Categories](#) in this report for a complete description.

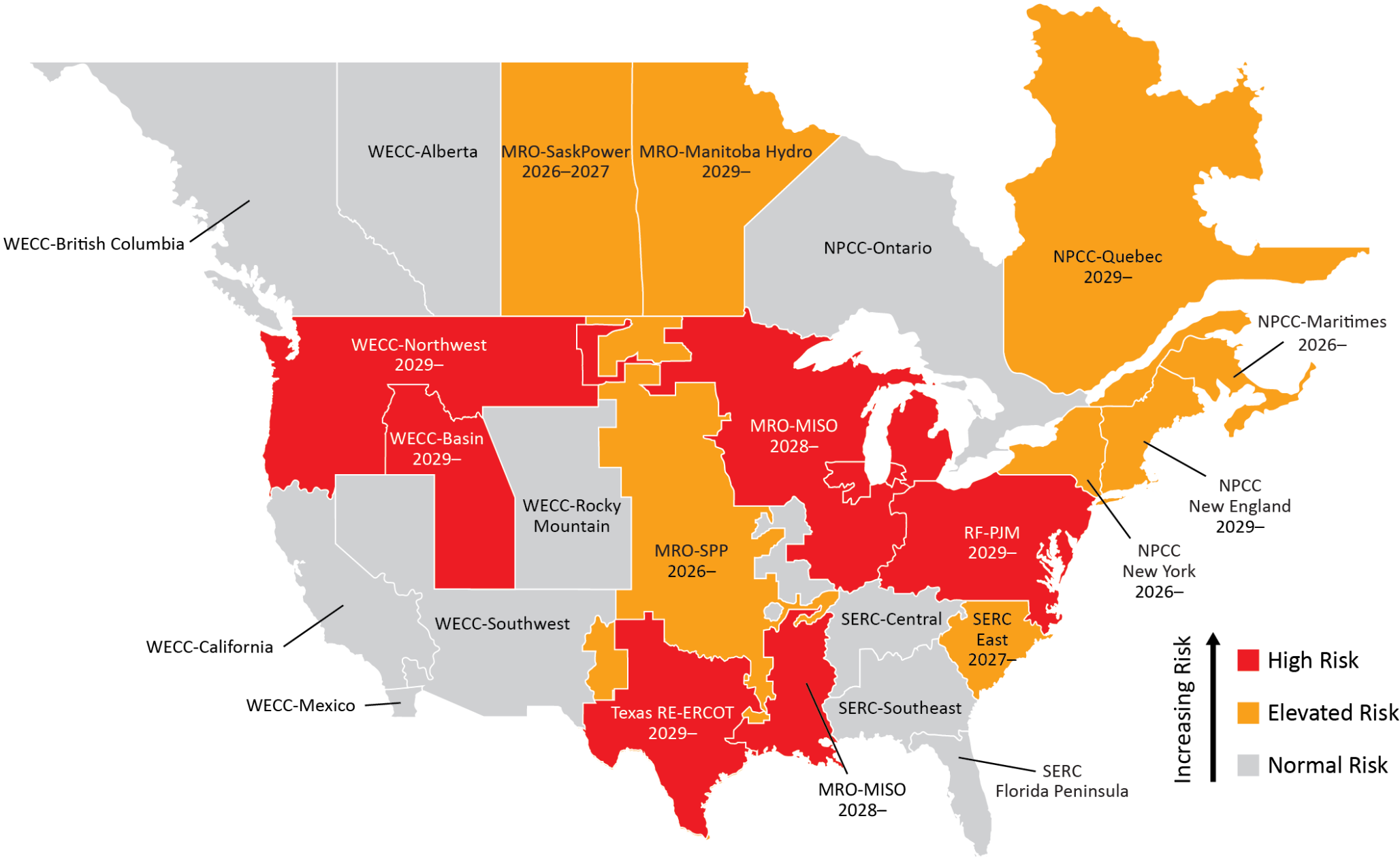


Figure 1: Risk Area Summary 2026–2030

Shows highest risk classification that occurs in the first 5 years and states initial year of occurrence

Table 1: Capacity and Energy Risk Assessment Area Summary

Assessment Area	Risk Level (High, Elevated, or Normal)					Risk Summary
	2026	2027	2028	2029	2030	
MISO						Projected resource additions do not keep pace with escalating demand forecasts and announced generator retirements. The recently approved <i>Expedited Resource Addition Study</i> (ERAS) process is expected to result in additional resources in the MISO system beginning in 2028 that are not included in the model for the 2025 <i>LTRA</i> . Timely implementation of ERAS resources will eliminate reserve margin shortfall and improve expected unserved energy metrics.
MRO-Manitoba						With rising demand, planned reserves are falling, leading to potential resource shortfalls in low-hydro conditions.
MRO-SaskPower						With current resources, there is risk of insufficient generation during fall and spring when more generators are undergoing maintenance. Expected natural-gas-fired generator additions in Winter 2027 will boost planned reserves and reduce risks of unserved energy.
MRO-Southwest Power Pool (SPP)						Demand forecasts outpace resource additions, leading to falling reserve margins. Scenarios with low wind and high generator forced outages identify energy shortfall risks. SPP’s <i>Expedited Resource Adequacy Study</i> is attracting additional resources.
NPCC-Maritimes						Demand growth forecasts have increased since the 2024 <i>LTRA</i> , while expected capacity contributions from variable energy resources (VER) have declined, causing resource shortfalls in the near term. New natural-gas-fired generation planned for 2028 will reduce the potential unserved energy, but not below the elevated risk threshold.
NPCC-New England						Strong demand growth and persistent winter natural gas infrastructure limitations pose risks of energy shortfalls in extreme winter conditions.
NPCC-New York						Planned retirements of peaking generators create localized system adequacy needs as described in the New York ISO 2025 <i>Q3 Star Report</i> .
NPCC-Québec						Demand growth projections are outpacing planned resource additions, leading to projected resource shortfalls in the winter season.
PJM						Current projections for resource additions do not keep pace with escalating demand forecasts and expected generator retirements. The anticipated resource margin falls below the Reference Margin Level starting in 2029. Recently approved new generation projects for expedited interconnection under the PJM Reliability Resource Initiative were not far enough along to include in the <i>LTRA</i> risk analysis.
SERC-East						Current projections for resource additions do not keep pace with escalating demand forecasts and planned generator retirements. With projected resources, supply shortfalls would occur in below-normal winter temperatures, resulting in unserved energy.
Texas RE-ERCOT						Probabilistic unserved energy metrics for 2026–2027 have improved since the 2024 <i>LTRA</i> , but continued rapid load growth outpaces projected resource additions in later years. To mitigate increasing resource adequacy risks from load growth, Texas lawmakers have granted ERCOT operators additional authority to curtail new large loads if necessary to prevent grid emergencies. Texas lawmakers also established funding programs to expedite new resources that address reliability needs.
WECC-Basin						Demand forecasts outpace resource additions and expected generator retirements, leading to falling reserves. Resource additions nearing completion are predominantly solar PV, leading to a more variable resource mix. Unserved energy risk is in summer.
WECC-Northwest						Rapid forecasted demand growth is driving the need for more resources. Resource additions nearing completion are predominantly solar PV, battery, and wind, leading to a more variable resource mix. Periods of unserved energy are projected for both summer and winter.

Regional Assessments Dashboards

The [Regional Assessments Dashboards](#) section contains dashboards and summaries for each of the 23 assessment areas, developed from data and narrative information collected by NERC from the six Regional Entities. Probabilistic assessments (ProbA) are presented that identify energy risk periods and describe the contributing demand and resource factors.

Responding to Trends in Resource Adequacy

As resource adequacy concerns have expanded and grown more acute in many parts of the North American BPS, more actions have been taken by industry and regulators to bolster resources.

- Projected retirements have shrunk from the *2024 LTRA*. Growing demand, market signals, and resource plans have highlighted the potential need to keep resources on-line longer than previously anticipated. Though the confirmed and announced potential retirements over the next 10 years remain high and total over 105 GW in peak seasonal capacity, this is roughly 10 GW lower than the 10-year retirement projections last year.
- The initiation of market mechanisms like capacity accreditation has also more precisely highlighted the loss-of-load risks posed by a generation mix that has increasing amounts of variable resources. Market procurements are becoming more effective in procuring resources as a result.
- Expedited resource programs that were approved by FERC in late Summer 2025 for MISO, PJM, and SPP have resulted in acceleration and prioritization for resources that can address identified reliability risks. Most new resources brought in through recently approved expedited resource programs are not included in the *2025 LTRA* risk assessment.
- Lawmakers in Texas have provided ERCOT with curtailment management authority over new large loads to prevent grid emergencies and established funding to speed new generating capacity to the grid.

The [Capacity and Energy Risk Assessment](#) and [Regional Assessments Dashboards](#) sections provide details on these examples and initiatives in other assessment areas.

Trends and Reliability Implications

Demand, resource, and transmission trends affect long-term reliability and the sufficiency of electricity supplies. A summary for each is provided below and further discussed within the [Demand Trends and Implications](#) and [Transmission Development and Interregional Transfer Capability](#) sections.

Demand Trends and Implications

Electricity peak demand and energy growth forecasts over the 10-year assessment period continue to climb higher than at any point in the past two decades. Over the 10-year period, aggregated assessment area summer peak demand is forecast to rise by over 224 GW. This is 69% higher than last year’s 10-year growth projection of 132 GW. Winter peak demand is expected to grow by 245 GW, continuing to outpace summer and exceed prior-year projections. New data centers for artificial intelligence and the digital economy account for most of the projected increase in North American electricity demand over the next 10 years.

Demand and large-load projections throughout the LTRA are based on load-serving entity (LSE) and BPS system planner forecasts provided to NERC during LTRA development, reflecting mid-2025 plans. LSE load forecasts are based on information from the interconnection process and agreements between utilities and owners of connecting loads, such as facility peak demand, load flexibility, and some operating characteristics. To be counted in load forecasting, data center projects have advanced from speculative and exploratory stages into development commitments necessary to drive grid planning studies. Still, large loads inherently add volatility to load forecasts as project timelines and commitments can vary with factors related to construction, permitting approvals, grid development, and data center owner decisions. ERCOT and PJM, the grid planners and operators for two areas experiencing vigorous large-load and data center development, have each prepared revised load forecasts since the *2025 LTRA* data collection period that, due to timing, is not used in this LTRA. Both forecasts indicate that some large-load projects have slowed or failed to materialize within the shorter-term horizon, while interconnection requests for later years continue to increase. Load forecasts that are revised downward can shrink the energy shortfalls that are projected in this LTRA.

Resource Additions and the Changing Resource Mix

The shift toward a more variable resource mix continues, as battery, solar PV, and hybrid generation lead the most recent and projected near-term additions and as fossil-fired generators retire. From 2024 to 2025, the existing capacity from fossil-fueled generators fell by 21 GW, while BPS capacity for peak demand hours from battery, wind, and solar resources increased by 23 GW.

In a shift from a key insight from the *2024 LTRA*, solar PV is no longer the sole, predominant generation type planned over the next 10 years. New battery resource projects have grown to match solar projections, and, together, solar and battery capacity additions represent two-thirds of the Tier 1 and Tier 2 resources in this year’s 10-year LTRA study period. Natural-gas-fired generator additions represent 15% of the projected capacity additions followed by wind and hybrid at 8% each. While interconnection queues continue to swell, considerable uncertainty surrounds the timing and amount of resource additions. Overall, on-peak resource capacity in Tier 1 and Tier 2 has grown modestly since

the 2024 LTRA by 7 GW (1.7%). This is slightly less than in the prior year when Tier 1 and Tier 2 capacity grew by 44 GW.

As older fossil-fired generators retire and are replaced by more battery and solar PV resources, the resource mix is becoming increasingly variable and weather-dependent. The share of VERs in the existing BPS on-peak resource capacity increased from 9.5% to 10.2% over the last year. VERs have different physical and operating characteristics from the generators that they are replacing, affecting the essential reliability services (ERS) that the resource mix provides. Frequency response, or the ability of the BPS to maintain stable frequency, is one such ERS that NERC assesses on an Interconnection basis to ensure future resource mix reliability. Battery storage can enhance system frequency response. Other IBRs provide little or no frequency response capability, requiring grid operators to ensure that enough synchronous generators and other facilities are on-line for system stability. This year’s LTRA finds that the future resource mix in each Interconnection through 2027 has sufficient resource types to provide for adequate frequency response. As generators are deactivated and replaced by new types of resources, ERSs must still be maintained for the grid to operate reliably.

The thermal generation component of the resource mix is increasingly reliant on natural gas for fuel as new natural-gas-fired generators are added to the BPS and as some existing coal-fired generators undergo fuel conversion. Overall, 13 out of 23 assessment areas are adding capacity to their fleet of natural-gas-fired power plants over the next 10 years: 53 GW of new natural-gas-fired winter capacity is in the planning queues, and new ERAS programs will add more. As new natural-gas-fired generators progress through interconnection processes, Generator Owners, grid planners, and natural gas infrastructure developers need to take steps to ensure that regional natural gas infrastructure can reliably serve the needs of BPS generators.

Transmission Development and Interregional Transfer Capability

Transmission projections reported for the 2025 LTRA reflect an increase in transmission development, continuing a trend that emerged in the 2024 LTRA. This year’s cumulative level of 41,000 miles (66,000 km) of transmission (>100 kV) under construction or in various stages of development for the next 10 years is substantially higher than the 2024 LTRA 10-year projections (28,275 miles or 45,504 km). Transmission in construction has yet to increase substantially over past-year levels; rather, the large increase in transmission projects is seen in planning phases. Several Planning Coordinators (PC) have recently approved, or are actively contemplating, expansive extra-high voltage (EHV) overlays on their systems to address new generator additions and a variety of reliability needs, including Hydro-

Québec, ERCOT, SPP, MISO, PJM, BC Hydro, and the Independent Electricity System Operator (IESO) in Ontario.

Interregional transmission projects that support energy transfers across Interconnections make up a small but important portion of total BPS transmission development. They can allow entities to take advantage of geographic diversity during extreme weather, such as Winter Storm Elliott,⁹ including scenarios identified in the *Interregional Transfer Capability Study* (ITCS) published by NERC in 2024, and the separate *Interregional Transfer Capability Study (Canadian Analysis)*. About 4% of transmission projects reported for the 2025 LTRA are for tie-lines that support transfers between neighboring systems, lower than the 6% reported in the 2024 LTRA.

Transmission development in some areas is hampered by growing risks in procurement and supply chain delays. Other reasons for delays include economic impacts, planning and construction issues, permitting issues, or changing needs. Of nearly 900 projects that were under construction or in planning for the next 10 years, at least 390 projects have been delayed from their originally expected in-service dates.

Recommendations

To address the energy and capacity risks identified in this LTRA, NERC recommends the following priority actions:

- 1. **Integrated Resource Planners, market operators, and regulators: Expedite new resources to meet growing demand and carefully manage generator deactivations.** BPS planners should develop, implement, or enhance mechanisms to expedite resource additions to the grid that provide the services needed to address anticipated reliability issues related to each area’s needs. Independent System Operator/Regional Transmission Organizations (ISO/RTO) should evaluate mechanisms and process enhancements for obtaining information on expected generator retirements that would support early identification of reliability risks. State and provincial regulators and ISO/RTOs need to have mechanisms they can employ to extend the service of generators seeking to retire when they are needed for reliability, including the management of energy shortfall risks. Regulators must support resource development and manage the pace of retirements such that replacement infrastructure can be developed and placed in service to support reliability needs.
- 2. **NERC, industry, and regulators: Understand and manage reliability risks accompanying large-load growth and leverage potential capabilities in new types of loads to provide flexibility to operators during times of grid stress.** An increasing number of large commercial and industrial

⁹ [Winter Storm Elliott Report: Inquiry into Bulk-Power System Operations During December 2022 | Federal Energy Regulatory Commission](#)

loads is rapidly connecting to the BPS. Emerging large loads—such as data centers (including cryptocurrency and artificial intelligence applications) and hydrogen fuel plants—present unique challenges in BPS planning and operations. Stakeholders should support NERC’s Large Loads Action Plan¹⁰ and collaborate through NERC’s Large Loads Task Force.¹¹ ISO/RTOs should collectively work to create more uniform requirements to address the emerging reliability issues associated with large data center loads.

3. **NERC, Regional Entities, and industry: Improve the LTRA by incorporating new analysis and criteria to inform stakeholders of future reliability risks.** NERC increased the frequency of the ProbA from biennial to annual and included unserved energy and load-loss metrics as the basis for risk analysis in this year’s LTRA. To promote consistency in analysis and develop assessment capabilities, NERC and the Regional Entities piloted Interconnection-wide energy assessments using a common probabilistic resource adequacy tool in 2025. Wide-area energy analysis will support the evaluation of interregional transfer capabilities and the effects of extreme weather and regional fuel supply issues on the BPS at an Interconnection level. Industry should work with NERC through its technical groups to implement ERO energy assessments in the 2026 LTRA and continue to improve consistency in the annual ProbA. NERC and the Regional Entities, in consultation with the RSTC, should also continue to enhance NERC’s LTRA to assess ERSs in the future system and the potential impact of new and evolving electricity market practices, regulations, or legislation on resource adequacy.
4. **Regulators and policymakers: Streamline siting and permitting processes to remove barriers to resource and transmission development.** As ISO/RTOs continue looking for opportunities to speed transmission planning processes, many states are also taking steps to expedite siting and permitting. Siting and permitting issues are among the most common causes for delayed transmission projects. Support from regulators and policymakers at the federal, state, and provincial levels is urgently needed.
5. **Regulators, electric industry, and gas industry member organizations: Continue identifying and implementing solutions for addressing the operating and planning needs of the interconnected natural gas-electric energy system.** As various initiatives launched in past years roll out recommendations for addressing reliability needs, stakeholders should act with urgency on implementation. Continued collaboration through readiness forums and working groups remains a priority. While new regulatory and oversight mechanisms of the natural gas industry have yet to solidify, voluntary actions for managing natural gas production, processing, and delivery risks are needed. NERC, gas and electric industry, and research partners should continue studies and assessments of regional fuel supply risks to BPS generation.

6. **Regional transmission organizations, independent system operators, and FERC: Continue to ensure that ERSs are maintained.** The changing composition of the North American resource mix calls for more robust planning approaches to ensure adequate ERSs.¹² Retiring conventional generation is being replaced with large amounts of wind and solar; planning considerations must adapt with more attention to ERSs. As replacement resources are interconnected, these new resources should be capable of supporting voltage, frequency, ramping, and dispatchability. Many technologies can contribute to ERSs, including VERs; however, policies and market mechanisms need to reflect these requirements to ensure that these services are provided and maintained. ISO/RTOs and FERC have taken steps in this direction, and these positive steps must continue.

In addition to these priorities, NERC recommends continued progress in areas identified previously in NERC’s LTRA and other assessment reports. All recommendations are listed in the [Recommendations and ERO Actions Summary](#).

¹⁰ NERC’s Large Loads Action Plan: <https://www.nerc.com/initiatives/large-loads-action-plan>

¹¹ NERC’s Large Loads Task Force webpage: [Large Loads Task Force \(LLTF\)](#)

¹² Essential Reliability Services:

<https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/ERS%20Abstract%20Report%20Final.pdf>

Capacity and Energy Risk Assessment

Resource Planners and state and provincial policymakers use resource adequacy criteria to ensure that sufficient resources are available to meet demand and prevent unacceptable levels of energy shortfall. In their application, traditional capacity-based adequacy criteria were not designed to consider the magnitude, frequency, duration, and timing of potential energy shortfalls. Such [considerations](#) have become increasingly important as the resource transformation evolves from capacity-based resources with assured and stored energy supplies to energy-constrained resources that are increasingly impacted by weather and environmental conditions. NERC’s LTRA includes all-hours probabilistic indices to measure these additional dimensions of risk and provide a more complete analysis to inform system plans.

Assessment Approach

NERC evaluates industry-provided resource adequacy data and credible studies to assess risks of future energy shortfalls as the system is currently planned. Probabilistic and deterministic analyses provide forward-looking snapshots of resource adequacy tied to industry forecasts of electricity supplies, demand, and transmission development. The risk analysis entails these components:

- Assessing load-loss metrics determined from probability-based simulation of projected demand and resource availability over all hours. This approach identifies high risk periods and potential energy constraints resulting in load-loss events. The 2025 ProbA is performed for each assessment area and examines the system as planned for the years 2027 and 2029. Loss-of-load hours (LOLH) and expected normalized unserved energy (NEUE) from NERC’s ProbA are used to identify risk levels.
- Comparing the margin between projected resources and peak net demand, or reserve margin, to a reserve margin target (known as the Reference Margin Level (RML)) that represents the accepted level of risk based on a probability-based loss-of-load analysis.

NERC also incorporates other findings from scenarios or information from system studies to address assessment area-specific adequacy risks when needed. See MRO-SPP, NPCC-New England, and NPCC-New York.

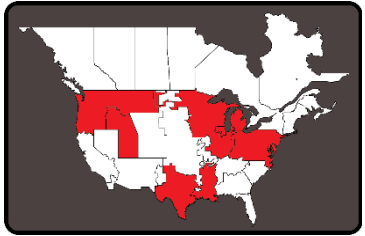
The risk determination is based on data and information provided to NERC during LTRA development and represents a snapshot in time. Integrated resource planning and ISO/RTO resource adequacy mechanisms vary across North America and can be implemented to respond to resource adequacy issues on many different timescales.

The [Demand Assumptions and Resource Categories](#) section provides further details on these approaches. Assessment area dashboards (see [Regional Assessments Dashboards](#)) provide resource capacity and energy risk assessment results for all areas.

Risk Categories

For the 2025 LTRA, NERC uses the following three levels of risk category determination for each assessment area and associated years for which there is a risk of energy shortfall during the first five years of the LTRA period (i.e., 2026–2030). The details for the risk criteria determination are shown below for each category of risk.

An assessment area is determined as **High Risk** when established resource adequacy targets or requirements are not met or when probabilistic or deterministic energy analyses find that planned resources produce shortfalls resulting in unserved energy or load loss exceeding criteria for baseline resource adequacy specified below. Regulatory authorities or market operators establish resource adequacy targets. Most targets in North America are currently based on a 1-day/event load loss in a 10-year planning requirement. See [Summary of Planning Reserve Margins and Reference Margin Levels by Assessment Area](#). Recently, regulators and policymakers in many states and market areas have begun to consider or develop resource adequacy targets based on additional criteria that can better address energy risks and extreme weather-related supply disruption.¹³ High risk areas are those where today’s demand forecasts and resource projections indicate a shortfall in future planned resources for expected (i.e., most likely, aka 50/50) demand and typical resource performance. More severe operating conditions associated with unusual heat waves or deep-freeze events would further exacerbate shortfalls in planned resources.



For the 2025 LTRA, NERC uses the following criteria to determine areas and associated years for which there is high risk of insufficient planned resources during the first five years of the LTRA period (i.e., 2026–2030):

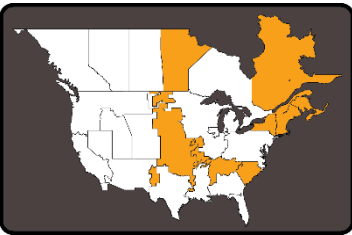
- Annual LOLH exceeds 2.4 hours/year for one or more years in the ProbA; or
- Annual normalized expected unserved energy (EUE) exceeds 0.002% (20 ppm) for one or more years in the ProbA; or

¹³ See the NERC-National Academy of Engineering Workshop Report [Evolving Planning Criteria for a Sustainable Power Grid](#).

- Resource adequacy target(s) established by regulatory authority or system operator are not met.

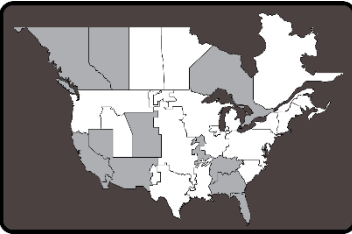
Resource Planners, regulators, and market operators in assessment areas identified as having a high risk of resource shortfalls can mitigate these risks through timely actions that address capacity and energy risks.

An assessment area is determined to have **Elevated Risk** when it meets the established resource adequacy targets and baseline criteria specified earlier but does not meet more stringent thresholds of unserved energy and load loss that provide for reliability in more extreme weather conditions. More extreme conditions can include temperatures that result in above-normal demand levels, low resource output or availability, and/or disruption of normal electricity transfers. In the analysis, elevated risk may be found by modeling above-normal demand and low resource availability. The risk can also be identified by examining output data from probabilistic analysis tools to determine the underlying conditions for load-loss events. For the *2025 LTRA*, assessment areas are classified as elevated risk when they meet any one of the following criteria in the first five years of the LTRA period (i.e., 2026–2030):



- Annual LOLH is between 0.1 and 2.4 hours/year for one or more years in the ProbA
- Annual normalized EUE is less than 0.002% (20 ppm) but greater than or equal to 0.0002% (2 ppm) for one or more years in the ProbA
- Resource adequacy target(s) established by regulatory authority or system operator are met, but plausible scenarios of above-normal demand and/or low-resource conditions indicate risk of loss of load

An assessment area is determined to have **Normal Risk** if resource adequacy criteria are met, and there is a low likelihood of electricity supply shortfall even when demand is above forecasts or resource performance is abnormally low (e.g., above-normal forced outages or low VER performance). Although areas determined as normal risk are expected to have sufficient resources for plausible extreme¹⁴ conditions, they are not immune to the effects of high-impact, low-frequency weather events that affect demand and generation simultaneously. For the *2025 LTRA*,



assessment areas are classified as normal risk based on an evaluation of the following criteria for each of the first five years of the LTRA period (i.e., 2026–2030):

- Annual LOLH is below 0.1 hours/year.
- Annual normalized EUE is below 0.0002% (2 ppm).
- Resource adequacy target(s) established by regulatory authority or system operator are met and reserves are expected to be available in plausible scenarios of above normal demand and/or low-resource conditions associated with a once-per-decade event indicate risk of load loss.

Application of the Risk Criteria: NERC uses industry-provided demand and resource information and the results from the ProbA performed by NERC Regional Entities, ISO/RTOs, and regulated utilities to determine risk of energy and capacity shortfalls. The methods, assumptions, and approaches used by entities to perform probabilistic assessments affect the results and outputs. In last year’s LTRA, NERC incorporated new probabilistic assessment risk criteria (LOLH and EUE) from the NERC-National Academy of Engineering Workshop Report, [Evolving Planning Criteria for a Sustainable Power Grid](#), alongside established reserve margin criteria. In instances where an assessment area’s probabilistic assessment results and reserve margins give mixed indications as to the risk category, adherence to resource adequacy targets (e.g., required RML and load-loss criteria) established by regulatory jurisdictions took precedence. Any other apparent contradictions with metrics and criteria were generally assessed according to results of all-hours probabilistic analysis.

A numerical summary of the assessment areas’ risk profile measured against the NERC risk criteria is summarized in **Table 2**. A risk description summary for each assessment area at an **Elevated Risk** or a **High Risk** is provided in the **High-Risk Area Details** or **Elevated-Risk Area Details** sections following **Table 2**. Full details about all assessment areas are provided in the **Regional Assessments Dashboards** section.

¹⁴ Plausible extreme conditions considered by NERC in this assessment are similar to those experienced during Winter Storm Elliott, Winter Storm Uri, and the 2020 Western Wide-Area Heat Dome.

Table 2: Capacity and Energy Risk Assessment Numerical Summary

	NEUE (ppm)		LOLH (hours/year)		Anticipated Reserve Margin					Reference Margin Level ¹⁵				
Summer-Peaking Areas	2027	2029	2027	2029	2026	2027	2028	2029	2030	2026	2027	2028	2029	2030
MISO	1.13	42.39	0.23	6.61	11.0%	11.2%	9.5%	8.6%	4.3%	8.1%	8.3%	8.5%	8.5%	8.5%
MRO-SPP	0.00	0.00	0.00	0.00	32.4%	30.3%	28.4%	25.1%	22.6%	19.0%	19.0%	19.0%	19.0%	19.0%
NPCC-New England	0.00	0.02	0.00	0.00	18.3%	21.7%	24.8%	23.7%	23.6%	13.4%	13.0%	13.0%	13.0%	13.0%
NPCC-New York	0.00	0.08	0.00	0.03	22.3%	24.5%	24.5%	23.6%	22.5%	15.0%	15.0%	15.0%	15.0%	15.0%
NPCC-Ontario	0.00	0.00	0.00	0.00	29.6%	19.8%	28.1%	18.7%	19.7%	16.1%	19.0%	22.6%	15.8%	19.5%
PJM	3.50	65.50	0.61	9.97	29.7%	28.3%	24.3%	18.9%	13.9%	18.6%	20.1%	21.9%	23.9%	26.3%
SERC-Central	0.00	0.00	0.00	0.00	19.1%	20.8%	19.7%	18.5%	16.5%	15.0%	15.0%	15.0%	15.0%	15.0%
SERC-East	0.98	2.27	0.15	0.33	30.6%	30.5%	30.5%	31.5%	34.9%	15.0%	15.0%	15.0%	15.0%	15.0%
SERC-Florida Peninsula	0.00	0.00	0.00	0.00	27.4%	25.2%	24.3%	22.6%	21.1%	15.0%	15.0%	15.0%	15.0%	15.0%
SERC-Southeast	0.00	0.00	0.00	0.00	35.9%	29.5%	29.8%	24.9%	20.9%	15.0%	15.0%	15.0%	15.0%	15.0%
Texas RE-ERCOT	8.70	18.84	0.95	3.64	28.2%	30.5%	31.8%	30.8%	29.9%	13.8%	13.8%	13.8%	13.8%	13.8%
WECC-Basin	0.04	2,250	3.00	310.00	36.3%	37.9%	27.4%	19.7%	15.2%	13.5%	14.0%	13.6%	12.4%	12.3%
WECC-California	0.00	0.00	0.00	0.00	53.2%	47.0%	46.1%	45.6%	42.7%	20.3%	19.2%	19.3%	19.7%	19.3%
WECC-Mexico	0.00	0.00	0.00	0.00	14.9%	13.8%	29.9%	27.0%	24.6%	7.8%	8.0%	9.1%	7.2%	7.0%
WECC-Rocky Mountain	0.00	0.00	0.00	0.00	51.3%	60.0%	53.2%	38.1%	30.5%	17.8%	17.0%	16.2%	16.1%	15.7%
WECC-Southwest	0.00	0.00	0.00	0.00	41.1%	39.6%	38.6%	38.4%	36.1%	13.3%	13.7%	13.6%	12.6%	12.2%
Winter-Peaking Areas	2027	2029	2027	2029	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031
MRO-Manitoba Hydro	0.12	0.23	0.03	0.06	13.9%	16.7%	15.4%	13.6%	1.2%	12.0%	12.0%	12.0%	12.0%	12.0%
MRO-SaskPower	5.24	0.19	1.09	0.05	25.9%	35.0%	33.4%	32.3%	31.2%	15.0%	15.0%	15.0%	15.0%	15.0%
NPCC-Maritimes	0.52	0.25	0.25	0.10	17.2%	18.5%	25.6%	23.0%	21.7%	20.0%	20.0%	20.0%	20.0%	20.0%
NPCC-Québec	0.00	0.29	0.00	0.11	15.6%	16.7%	14.7%	13.0%	11.5%	11.9%	12.2%	12.2%	12.2%	12.2%
WECC-Alberta	0.00	0.00	0.00	0.00	36.2%	45.3%	40.7%	38.0%	33.0%	11.8%	17.6%	14.3%	15.6%	11.6%
WECC-British Columbia	0.00	0.00	0.00	0.00	23.4%	19.1%	19.5%	24.1%	24.2%	11.7%	12.1%	12.1%	11.6%	11.6%
WECC-Northwest	0.00	36.64	0.00	85.00	30.2%	29.3%	23.3%	19.1%	15.7%	17.8%	17.4%	16.1%	15.8%	15.5%

¹⁵ Refer to the [Regional Assessments Dashboards](#) and the [Summary of Planning Reserve Margins and Reference Margin Levels by Assessment Area](#) table.

High-Risk Area Details

The assessment areas below exceed the highest level of risk criteria for the **High-Risk** classification during one or more years of the 2026–2030 period. Areas are listed in order of appearance in the [Regional Assessments Dashboards](#) section.

MISO (Normal Risk 2026/ Elevated Risk 2027/ High Risk 2028–)

Escalating demand forecasts and uncertainty around new resource commercialization timing contribute to heightened resource adequacy concerns in the MISO area. MISO forecasts its peak total internal demand at 127 GW during the 2026 summer season (up over 2.6 GW since the same year’s projection in the 2024 LTRA) and expects that summer demand will grow to 143.7 GW by 2035. The largest contributor to this accelerated demand growth is data center additions with 18 GW of data center loads projected by 2035. MISO’s accredited thermal capacity has decreased by 8.8 GW, driven primarily by reductions in accredited capacity of existing facilities and retirements. New solar PV resources contribute to a 5.7 GW increase in MISO’s accredited non-thermal capacity since last year.

As of July 2025, MISO has more than 54 GW nameplate capacity of generation—predominantly solar and battery—with signed generation interconnection agreements that are projected to come on-line over the next few years. As of December 2025, that figure increased to more than 70 GW of nameplate capacity. In addition to these resources, MISO instituted the [ERAS](#) process to respond to generation needs. The ERAS process provides a framework for the accelerated study of generation projects that address urgent resource adequacy and reliability needs in the near term. ERAS projects are not in the model for the 2025 LTRA. If ERAS projects come in as currently planned, the projected reserve margin shortfall would be eliminated.

Based on the current resource and demand forecasts, MISO begins to meet elevated-risk criteria in 2027 (see [Table 3](#)). While resources are adequate for regulatory requirements, the ProbA results show load loss and unserved energy exceeding the elevated-risk threshold. The Summer season makes up the bulk of annual risk in this region and is seen to materialize during late afternoon and evening hours when demand is high and solar resource output begins to decline. The ProbA also identifies winter risk periods during early morning and hours after 7:00 p.m. Additionally, shortfall 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.

As the demand forecast rises in subsequent years, and with currently projected generator retirements and planned resource additions, the ProbA shows worsening results. While resources are adequate for regulatory requirements (i.e., loss of load expectation (LOLE) of 0.1 day in a year), the ProbA results show load loss and unserved energy exceeding the elevated risk threshold criteria.

For the 2029 ProbA study, MISO assumed 14 GW of generator retirements that are uncertain to occur by 2029.

Table 3: MISO Base-Case Summary of Results		
	2027	2029
EUE (MWh)	797	31,654
NEUE (ppm)	1.13	42.39
LOLH (hours per Year)	0.23	6.61
Category	Elevated	High

With model assumptions, MISO would exceed load-loss and unserved energy criteria and fall below reserve margin targets to become a high-risk area beginning in Winter 2028 (see [Figure 2](#)). Projections for resource additions are predominantly solar PV, with some battery and wind resources. The small amounts of natural-gas-fired generation in signed interconnection agreements do not offset planned generator retirements, and, as a result, MISO is projecting shortfalls in planned resources for winter peak periods.

These results offer a point-in-time snapshot of risk based on the data available during the time of this year’s analysis. The regulatory structure within MISO provides utilities and regulators with many tools to ensure alignment of large-load additions, generator retirements, and generator additions. Regulators and utilities in the MISO region are statutorily required to ensure reliability and can work to address uncertainties associated with these three phenomena.

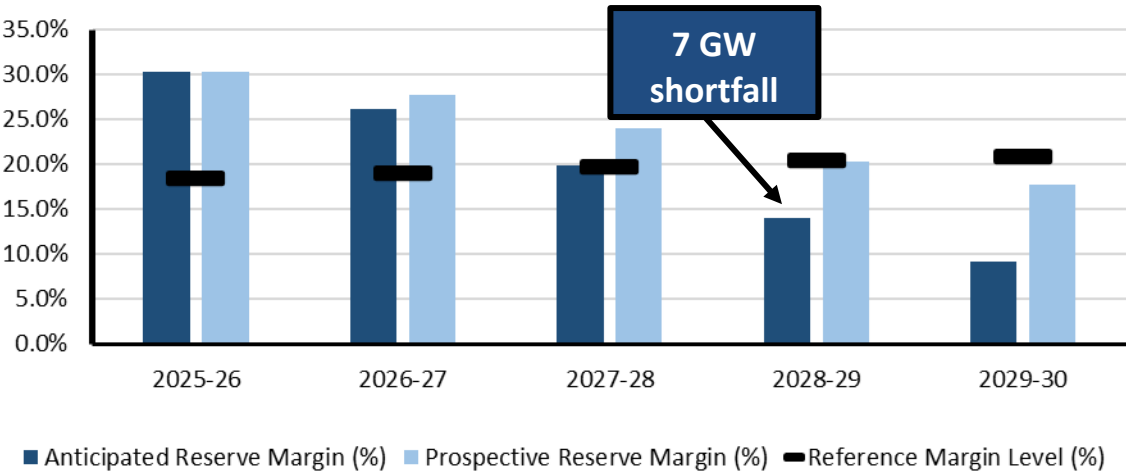
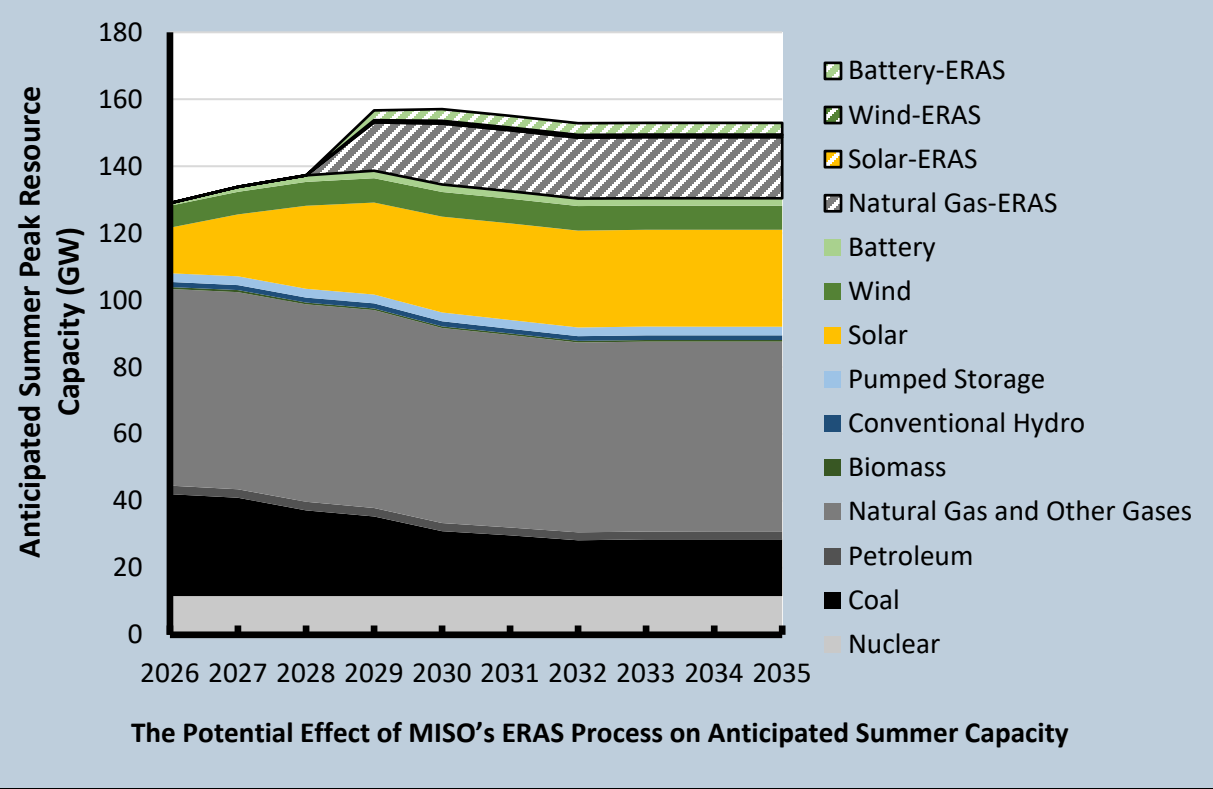


Figure 2: MISO Winter Planning Reserve Margins

Currently, MISO has surplus transfer capacity within its assessment area, but transfers between subregions have been historically constrained by a transmission limitation between the northern and southern MISO subregions.

The timing of FERC’s approval of MISO’s ERAS process in July meant that the generator additions that MISO plans as part of that process were not included in the resource adequacy modeling for the 2025 LTRA. ERAS is already expected to result in considerable new resource additions to the MISO system in the near term. The additional summer on-peak capacity from ERAS is expected to grow to over 20 GW by summer 2030. These expedited resource additions are expected to reduce the shortfall risk identified in this year’s ProBA. Furthermore, the timing of the ERAS additions would mitigate an identified winter ARM shortfall if the approximately 8.6 GW of winter on-peak capacity anticipated by 2028–29 reaches operation as projected. The latest ERAS projects, along with current load forecasts and resource projections as of July 2026, will be included in the input data for the 2026 LTRA, and ERAS summer capacity additions are summarized by the diagonal hatched stacked areas in plot below.



PJM (Elevated Risk 2026–2028/ High Risk 2029–)

Demand for electricity in PJM is growing at its fastest pace in years, driven primarily by data centers, followed by electrification and manufacturing loads. PJM expects its summer peak demand to grow by 56 GW to a total of 210 GW in 2035, and its winter peak demand is expected to climb by 62 GW to reach 198 GW by winter 2034–35. PJM’s annual net energy for load growth rate is projected to average 4.8% per year over the next 10 years, up from 2.3% in last year’s projections.

At the same time, PJM faces an extreme and rapid tightening of capacity resources in the near term because of generator retirements and project delays. A large share of PJM’s new interconnection requests is from VERs, approximately 40% of which are solar, and dispatchable resources are currently leaving the system faster than they can be replaced with other dispatchable technologies. These factors, paired with PJM’s limited reliance on transfers from neighboring areas to meet resource adequacy targets (maximum total transmission interchange capability is <2% of PJM’s internal generation capacity), have led to a projection that PJM’s ARM may fall below its Installed Reserve Requirement (or RML) in 2029 (see [Figure 3](#)).

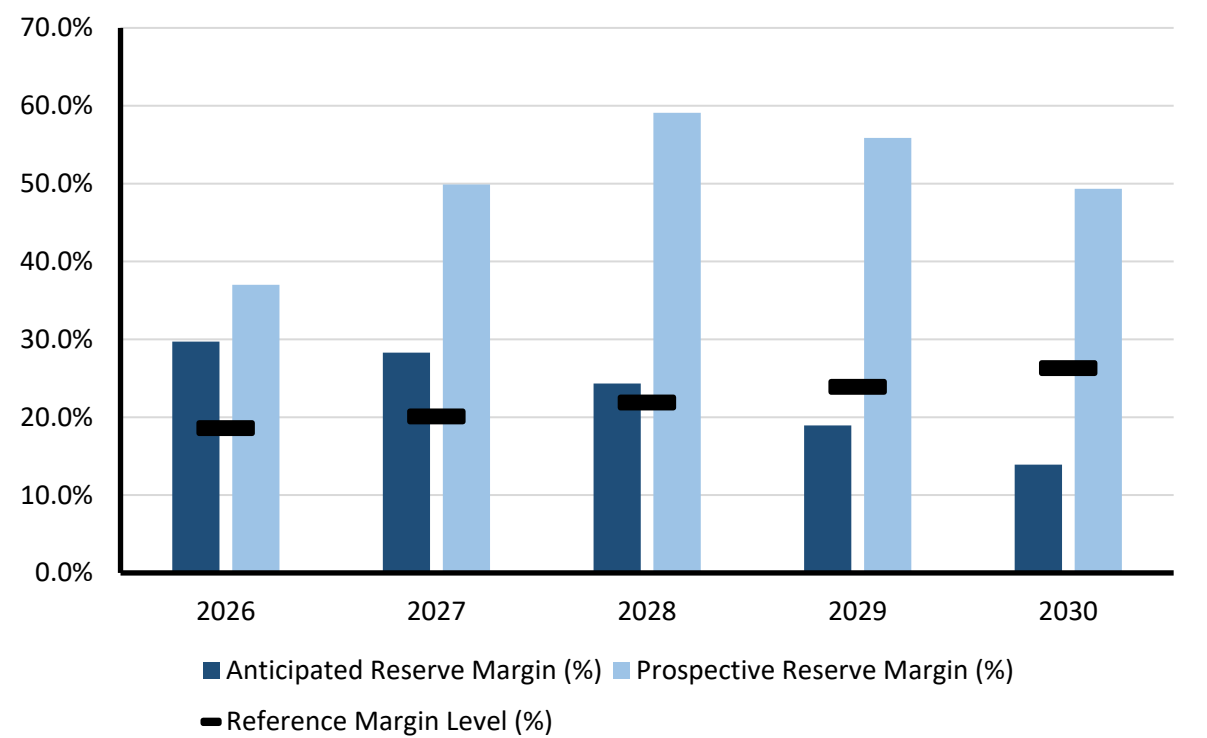


Figure 3: PJM Summer Planning Reserve Margins

As part of its reforms to speed interconnection with the system, PJM has approximately 30,000 MW of generation projections in the transitional interconnection queue to be processed in 2026. PJM’s new cycle process opens in April with a one- to two-year timeline for reviews, depending on the impact to the system. From the time of the original 2025 LTRA data submittal to recent evaluation, PJM projected an additional 8.3 GW of Tier 1 summer resource capacity over the next seven years. Tier 1 resource additions will provide 3.4 GW of winter capacity. However, many of these projects continue to be slowed or stopped by factors affecting multiple regions across the continent, including local opposition, state/local permitting delays, supply chain challenges or financing.

In 2025, FERC approved a PJM-proposed expansion of Surplus Interconnection Service to augment the operating efficiency and availability of existing resources, and the Reliability Resource Initiative (RRI), which attracted 11,000 MW of nameplate capacity in proposed, shovel-ready generation projects. Such initiatives also impacted Tier 2 resources from 2026 to 2031, netting an additional 8.2 GW in summer capacity from the original 2025 LTRA data submittal and 4.1 GW in winter capacity. This net increase factors resources that transitioned from Tier 2 to Tier 1, the Reliability Resource Initiative, and any recently withdrawn projects.

Setting aside the impact of such initiatives, results of the ProbA using PJM’s current resource and demand forecasts indicate that the area is at an elevated risk of resource shortfalls at the beginning of the 10-year horizon (see [Table 4](#)). Because this year’s ProbA does not study years earlier than 2027, the elevated-risk determination is based on results of the 2024 ProbA and consideration of the declining ARM in PJM since last year’s LTRA (2026 Summer ARM has fallen from 35.7% to 29.7%). The greatest risk of resource shortfalls leading to unserved energy or load loss in PJM occurs in the winter months during the early morning and evening hours. The risk is associated with generator availability and performance issues that can arise from equipment freezing and fuel supply issues during extreme winter conditions. PJM falls into the high-risk category beginning in 2029 as demand forecasts continue to climb, generators reach planned retirement dates, and the projected resources become less certain. The winter risk profile indicates that new resources will need to be capable of reliably serving winter load.

Table 4: PJM Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	538	3,251	67,581
NEUE (ppm)	0.00	3.50	65.50
LOLH (hours per Year)	0.1	0.61	9.97
Category	Elevated	Elevated	High
*Provides the 2024 ProbA Results for Comparison			

Texas RE-ERCOT (Elevated Risk 2026–2028/ High Risk 2029–)

The Texas RE-ERCOT assessment area is forecast to experience continued rapid electric demand growth over the next 5–7 years. ERCOT forecasts summer peak total internal demand to increase from 94,650 MW for 2026 to 154,077 MW for 2035, an average annual increase of 5.6%. This load growth is mainly driven by forecasted interconnections of large loads totaling 45 GW by 2030, of which 23 GW are data centers.

ERCOT continues to evolve its planning methods as fluctuations in recent large interconnections activity continue to affect both near- and long-term demand expectations. Several projects have slowed or failed to materialize within the shorter-term horizon, while interconnection requests for later years continue to increase. Such fluctuations do not, however, undercut the significance of demand growth attributable to large loads.

Responding to rapidly escalating demand from data centers and other large industrial loads, ERCOT, regulators, and lawmakers in Texas are adapting with policy and planning approaches to address emerging supply risks. Actions provide ERCOT with new curtailment management tools for large loads, establish criteria for when to incorporate new large loads in system planning, and help fund and speed new generating capacity to the grid. Furthermore, the first reliability assessment for the Public Utility Commission of Texas (PUCT)-approved Reliability Standard, and potential approval of market design changes to address deficiencies, is scheduled for completion by year-end 2026. Such market design changes would further mitigate energy risk.

Signed into law in June 2025, Texas Senate Bill 6 directs the PUCT to establish uniform large-load interconnection standards that, among other things, provide ERCOT with new large-load curtailment management tools and provide ERCOT authority to direct (or require transmission service providers to direct) large loads to curtail their load prior to and during declared energy emergency situations. For the 2025 LTRA, ERCOT’s DR contributions have increased substantially to reflect the authority and capability to curtail new large loads during energy emergencies. For Summer 2026, DR contributes 13.3 GW to resource adequacy (up from the 2.7 GW projection in the 2024 LTRA), and contributions from DR rise to 53.1 GW by 2030. Because new large loads can be curtailed during energy emergencies, the rapid rise in projected large loads has substantially less effect on Planning Reserve Margins in ERCOT than in the 2024 LTRA.

The ARM is above the 13.75% RML for all years (see [Figure 4](#)).

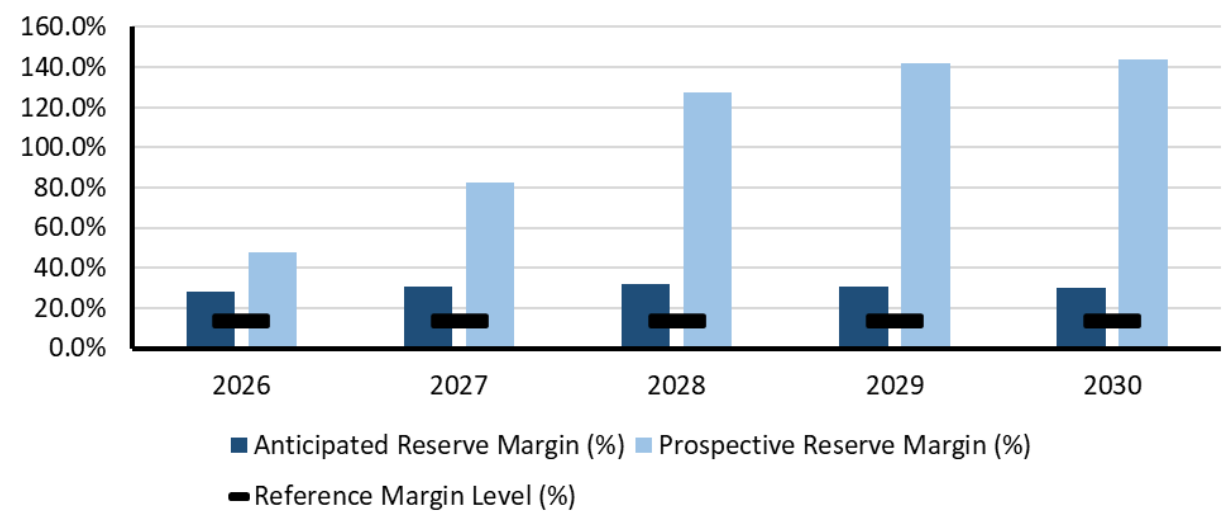


Figure 4: TEXAS RE-ERCOT Summer Planning Reserve Margins

ERCOT’s Planning Reserve Margins in the 2025 LTRA are also being affected by the implementation of new capacity contribution methods. ERCOT has switched from using historical average on-peak capacity factors to average effective load carrying capabilities (ELCC) for VERs, and the resulting capacity derates largely offset the gains that load management programs have on ARM. In the case of solar, ELCCs are significantly lower than prior years. ELCC values are probabilistically derived and reflect resource reliability value, and in the case of solar, this value has been decreasing as reserve scarcity risk shifts to the evening hours when solar availability is low.

The ProbA results for Texas RE-ERCOT reveal some improvement in near-term resource adequacy when compared to the 2024 LTRA, but the area remains an elevated risk through 2027 before forecasted load growth drives the area to high risk (see Table 5). ERCOT’s ProbA modeling includes demand-side management protocols that reasonably reflect large load curtailments described above, and other programs used in ERCOT’s market. This modeling contributes to the improved unserved energy and load-loss hour metrics that are observed between the 2024 ProbA and the current ProbA. Battery resource additions since last year and improved modeling in the resource adequacy analysis tool also contribute to these improved metrics.

Table 5: Texas RE-ERCOT Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	11,090	5,865	17,053
NEUE (ppm)	18.95	8.70	18.84
LOLH (hours per Year)	1.57	0.95	3.64
Category	Elevated	Elevated	High
*Provides the 2024 ProbA Results for Comparison			

ERCOT’s ProbA study results show that most resource adequacy risk is in the winter, and this is mainly driven by the large demand variability associated with winter temperatures. By 2029, there is significant risk in the summer and slight risk in the shoulder seasons, driven by the considerable growth of large loads across the year. For non-winter months, ERCOT continues to experience the highest reserve scarcity risk during the early evening hours (peaking at hour ending (HE) 9:00 p.m.) based on probabilistic capacity reserve modeling for monthly peak load days. During these periods, the drop-off in solar generation causes margins to decrease when load remains high. Battery storage helps reduce these short-duration energy risks. ERCOT expects battery energy storage capacity to reach 18.9 GW by Summer 2026 (Existing and Tier 1 resource categories) and grow to 25.2 GW by 2029. ERCOT typically sees the greatest energy provided by energy storage during net load peaks when solar is ramping off in the evening, or during early morning hours prior to solar ramping up.

In response to the rapid and unprecedented load growth, the PUCT in April 2025 approved three 765 kV import paths identified in the *Permian Basin Reliability Study*, which introduced the new 765 kV voltage class into the ERCOT region after six decades since the introduction of the 345 kV voltage class. The Texas 765-kV Strategic Transmission Expansion Plan (TX 765-kV STEP) tackles the unprecedented load growth expected by 2030 and enhances transfer capability by an additional 600 MW to 3,000 MW. This 765 kV addition enables power to flow more efficiently through long-distance transmission from resource-rich regions to load centers.

WECC-Basin (Elevated Risk 2026–2028/High Risk 2029–)

Forecasted load growth and planned generator retirements in the Great Basin (WECC-Basin assessment area) present resource adequacy challenges. Over the next 10 years, the summer demand forecast will rise by over 1.7 GW (17%, or 1.8% compounded annually), while at the same time the capacity from currently existing resources will decline by nearly 2.3 GW through generator retirements and other capacity changes. Solar resources are the predominant type nearing project completion: There is 3.5 GW of nameplate solar capacity (capable of providing 2.3 GW to summer capacity) in Tier 1 resources for the assessment period, making up nearly half of all resources in the

Tier 1 and Tier 2 planning.¹⁶ The projected resources, with planned retirements and additions, are not sufficient for forecasted demand, resulting in some unserved energy and load-loss hours in the future-year energy analysis. While the ARM does not fall below the RML during the 2026–2035 time frame and indicates substantial surplus, the ProbA results indicate significant EUE and LOLH (see [Table 6](#)).

Table 6: WECC Basin Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	N/A	3	200,892
NEUE (ppm)	N/A	0.04	2,250.70
LOLH (hours per Year)	N/A	3.00	310.00
Category	-	High	High
*No prior results as the assessment area is new for the 2025 LTRA.			

The risk of shortfall in the WECC-Basin area is concentrated in the summer months when seasonal electricity demand is highest. ProbA results for 2027 indicate that risk is most concentrated to the month of peak demand and the hours around sunset as solar output declines. The LOLH in 2027 and 2029 coincides with the evening solar down ramp and the persistence of elevated demand after peak. For 2029, as planned retirements of coal-fired generation and all currently projected resource additions are reflected in the resource mix, risk periods expand across all summer months, and the hours of risk extend from midday to nighttime. In WECC’s ProbA modeling, energy transfers from neighboring areas are helping WECC-Basin meet supply deficits, but at times they are insufficient, resulting in unserved energy and load-loss hours.

Unlike the ProbA results from other areas, WECC’s probabilistic model produces values higher values for load loss and EUE because the results are not probabilistic weighted averages. Taking this into account, NERC assesses WECC Basin as an elevated risk through 2029 even though the reported load-loss hours from the simulations exceed high-risk criteria

WECC-Northwest (Normal Risk 2026–2028/ High Risk 2029–)

Peak load in the WECC-Northwest assessment area is forecast to increase by 6.6 GW (19%) over the next 10 years, driven by an influx of data centers into the Pacific Northwest. There are over 10 GW of new wind, solar, and battery projects expected to connect over the next five years (nameplate capacity) and provide an expected on-peak capacity contribution in winter of 3.2 GW. Additional resources will be needed to avoid shortfalls in planning reserves and prevent energy risks from

¹⁶ Tier 1 resources in the LTRA are those resources in the interconnection process that have high confidence of being realized and generally under construction or have signed interconnection agreements. Tier 2 resources have more uncertainty in being realized and are in earlier development stages such as undergoing interconnection planning study.

emerging. While the ARM does not fall below the RML during the 2026–2030 time frame, the ProbA results based on current resource projections and demand forecasts indicate significant EUE and LOLH by 2029 (see [Table 7](#)).

Table 7: WECC Northwest Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	N/A	0	8,080
NEUE (ppm)	N/A	0.00	36.64
LOLH (hours per Year)	N/A	0.00	85.00
Category	N/A	Normal	High
* No prior results as the assessment area is new for the 2025 LTRA.			

Resource adequacy concerns in the U.S. Northwest can arise in the summer and winter seasons. Peak demand occurs in the winter months. In the ProbA results, load-loss hours occur at a greater frequency during winter high-demand periods. The summer months also have an emerging risk of shortfalls according to the ProbA: The 2029 study year had approximately 85% of identified unserved energy occurring between the afternoon-to-evening hours of mid to late summer.

Elevated-Risk Area Details

The below areas are classified as **Elevated Risk** as they are projected to meet resource adequacy criteria and have energy and capacity for normal forecasted conditions but are at risk of supply shortfall in extreme conditions. Areas are listed in order of appearance in the [Regional Assessments Dashboards](#) section.

MRO-Manitoba Hydro (Normal 2026–2028/ Elevated 2029–)

The Winter 2026–2027 peak demand forecast grew by 127 MW, exceeding the projected 29 MW growth from the 2024 LTRA. Demand growth is driven primarily by population growth and expected economic activity. Conversely, the forecasted annual peak demand growth rate for the next 10 years has fallen to almost 1.4%, down from around 1.8% projected in the 2024 LTRA. Generating resources are projected to remain largely the same over the 10-year planning period.

Similar to prior probabilistic assessments, Manitoba Hydro’s 2025 ProbA indicates elevated-risk levels of load loss in the later (year 4) study year (see [Table 8](#)). Resource adequacy concerns and load-loss risk in the ProbA arise from studied very low hydro conditions. Although the Manitoba system is

winter-peaking, the risk is primarily present during the summer season, with some risk also identified in the spring shoulder season. Planned electricity supply resources could fall short during an extreme and prolonged drought, affecting the predominantly hydroelectric system.

Table 8: MRO-Manitoba ProbA Summary of Results			
	2026*	2027	2029
EUE (MWh)	5	3	6
NEUE (ppm)	0.18	0.12	0.23
LOLH (hours per Year)	0.06	0.03	0.06
Category	Normal	Normal	Elevated
* Provides the 2024 ProbA Results for Comparison			

MRO-SaskPower (Elevated 2026–2027/ Normal 2028–)

Large industrial loads in Saskatchewan are driving average annual peak demand growth of 1.0% compounded annually over the next 10 years, down slightly from the 2024 LTRA’s projection (1.35%). To respond to demand growth, SaskPower recently added 370 MW of natural-gas-fired generation, 220 MW of VERs, and a 20 MW/20 MWh battery storage system to its system and is projecting on-peak resource additions of 700 MW over the next 10 years—a slight decrease from last year’s projection (~1 GW). Nameplate additions include 400 MW of wind, 300 MW of solar, and 525 MW of natural gas to offset ~32 MW of confirmed waste heat recovery and wind generation retirements. Saskatchewan is also deferring generator retirements and reactivating recently deactivated coal units and is bolstering both its intra-regional and interregional transmission system to diversify its current portfolio that relies heavily on firm transfers with Manitoba. Reserve margins are expected to remain above SaskPower’s RML for the entire 10-year period of the 2025 LTRA.

SaskPower is a winter-peaking system, but MRO-Saskatchewan’s probabilistic studies concluded that LOLH and EUE could occur during planned outages of large generators during peak demand hours in the spring and fall seasons. The ProbA reveals load-loss risk during the months of May, August, September, and October in 2027 based on current planned resources and load forecasts. Monthly and annual results improve in 2029 with SaskPower’s projected resource additions (see Table 9).

Table 9: MRO-SaskPower Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	76	145	5
NEUE (ppm)	2.81	5.24	0.19
LOLH (hours per Year)	0.55	1.09	0.05
	Elevated	Elevated	Normal
*Provides the 2024 ProbA Results for Comparison			

MRO-SPP (Elevated 2026–)

Resource additions and delays in generator retirements since the 2024 LTRA are improving the resource adequacy outlook for 2026, while higher demand forecasts and less capacity projects in development are causing lower planned reserves in later years. SPP’s ARMs are projected to remain above RMLs until after 2030 (see Figure 5). Additionally, ProbA results of the planned resources and demand forecast did not identify EUE or load-loss hours in studied years. Seasonal resource adequacy assessments by NERC have identified risks of insufficient operating reserves during periods of low wind and high generator outages.¹⁷ SPP is an elevated risk because it is projected to have lower planned reserves with a similar mix of VERs and dispatchable thermal generation in the future.

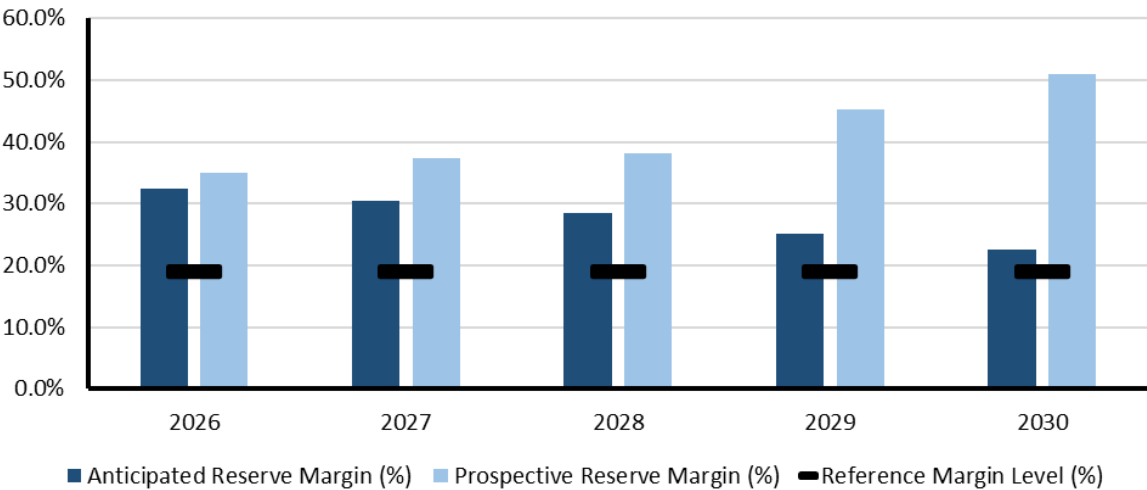


Figure 5: MRO-SPP Five-Year Planning Reserve Margin—Summer

¹⁷ See [NERC 2025 Summer Reliability Assessment](#)

Recent and newly approved resource adequacy initiatives in SPP are aimed at addressing demand growth and energy challenges associated with the evolving resource mix. SPP has approved higher Planning Reserve Margin requirements for LSEs that take effect beginning in the summer of 2026, along with a new winter reserve margin requirement starting later that year. These reserve margin requirements respond to growing resource adequacy challenges by obligating LSEs to obtain more firm resources for the summer and winter seasons. New performance-based resource accreditation will more accurately account for generator contributions to serving area demand during times of greatest need. The *Expedited Resource Adequacy Study* process, approved by FERC in July, is providing an accelerated pathway to interconnection for generation that supports identified resource adequacy needs.

NPCC-Maritimes (Elevated 2026–)

The Maritimes area peak loads are expected to increase by 8% during summer and by 10% during winter seasons over the 10-year assessment period (see [Table 10](#)). This translates to compound average growth rates of 0.8% in summer and 1% in winter, which are higher than the *2024 LTRA* projections (0.4% in summer and 0.6% in winter). Resource projections for Maritimes have diminished slightly since the *2024 LTRA* due to smaller peak capacity contributions from certain VERs through most of the planning period.

Firm capacity transfers in the first two years of the assessment period (2026–2027 and 2027–2028) decreased significantly from the *2024 LTRA* (322 MWs to -32MWs in 2026 and 215 MWs to 75 MWs in 2027). As a result, the ARM is below the 20% RML in those years, 17.2% and 18.5%, respectively. Beginning in 2028, the capacity transfers for the remaining assessment period are consistent with those in the *2024 LTRA*, and ARMs are projected to remain above the RML of 20% until 2032 when the ARM dips to 18.2%.

Table 10: NPCC-Maritimes Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	5	15	7
EUE (ppm)	0.17	0.52	0.25
LOLH (hours per Year)	0.09	0.25	0.10
*Results from the 2024 The ProbA simulations			

The ProbA for 2027 indicates elevated levels of unserved energy in the peak winter month of February. Load growth projections and resource mix characteristics are the primary driver. A few hours of risk occur in other winter months. Resource additions contribute to the improved EUE and LOLH metrics for the 2029 study year.

NPCC-New England (Normal 2026 –2028/ Elevated 2029–)

Since the *2024 LTRA*, 650 MW of fossil-fired generation has retired in New England, while wind, battery, and solar projects and uprating to an oil-fired power plant are projected to increase summer capacity by 1 GW in Summer 2026. Winter capacity is also increasing by a similar amount due to the expected contribution of offshore wind by winter 2026–2027. New England is among the areas projecting the highest growth in winter electricity demand, with winter peak demand forecast to increase by 7.1 GW (36%) from the Winter 2025–2026 forecast over the next 10 years. This demand forecast has changed little since the *2024 LTRA*.

ProbA results and reserve margin assessment for the NPCC-New England Assessment Area indicate that the risk of unserved energy in New England is small (see [Table 11](#)). Unserved energy risk is concentrated in the summer months when area demand currently peaks. However, escalating winter electricity demand and the performance challenges faced by the current and future resource mix in extreme, long-duration cold weather events is a persistent reliability concern. New England has already experienced constraints on electric energy production due to the availability of natural gas during winter. Interstate natural gas pipelines serving New England run at full capacity with (firm) gas utility contracts serving their residential, commercial, and industrial (RCI) customers. An extended cold spell or a series of cold spells can threaten regional natural gas fuel delivery infrastructure and result in insufficient fuel for electric generators. Dual-fueled generation provides crucial alternative energy to maintain electric system reliability. In scenarios of extended extreme cold, stored liquid fuels can become depleted and result in insufficient generation for demand.

Table 11: NPCC New England Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	11	<1	2
NEUE (ppm)	0.10	0.00	0.02
LOLH (hours per Year)	0.10	0.00	0.00
Category	Normal	Normal	Normal
* Provides the 2024 ProbA results for Comparison			

NPCC-New York (Elevated 2026–)

The *LTRA* anticipated and Prospective Reserve Margins are above RML of 15% for all 10 years. However, the system margins are narrowing throughout the assessment period. Although expected resource contribution is great enough to meet expected demand, there is risk due to the variability in the demand forecast with a greater risk added due to the variability in resource contribution. Demand could be 10–13% higher than expected, which could cause strain on the system.

This impact is shown in the increasing LOLH and EUE shown in [Table 12](#).

Table 12: NPCC New York Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	2	<1	12
NEUE (ppm)	0.01	0.00	0.08
LOLH (hours per Year)	0.01	0.00	0.03
Category	Normal	Normal	Normal
* Provides the 2024 ProbA results for Comparison			

While NPCC’s ProbA results and reserve margin assessment for the New York assessment area indicate that the risk of unserved energy in New York is relatively small, an assessment performed by NYISO, the *2025 Quarter 3 Short-Term Assessment of Reliability (STAR)*,¹⁸ identified transmission security reliability needs in the New York City and Long Island parts of the system to ensure summer reliability. With little reliability margin, plausible futures point to system issues within the next 10 years. Depending on demand growth and retirement patterns, the system may need several thousand megawatts of new dispatchable generation over that time frame.

Due to the reliability needs identified in the STAR report, NERC assesses that NPCC-New York is an elevated risk area and that, with current resource and transmission system projections, localized supply shortfalls are likely in extreme conditions.

NPCC-Québec (Normal 2026–2028/ Elevated 2029–)

Québec’s demand forecast has increased since the 2024 LTRA, driven by electrification of transportation, industrial decarbonization, and electric heating. New sectors such as hydrogen production, battery manufacturing, and data centers are also contributing to demand growth. Québec’s demand peaks at 41.4 GW in 2026–2027, rising to 49.6 GWs by 2035–2036, an increase of 8.2 GWs compared to the assessment period growth of 7.5 GWs projected in the 2024 LTRA.

With stable resources over the 10-year assessment period, Québec’s ARMs remain above the 12.2% RML for the first four years, falling below in 2030–2031 and all subsequent years. Québec and Ontario have a firm seasonal capacity exchange agreement through 2030–2031 that allows Québec to import 600 MW in winter.

¹⁸ Additional details available in the report: <https://www.nyiso.com/documents/20142/16004172/2025-Q3-STAR-Report-Final.pdf/>

Hydro-Québec’s Action Plan 2035 and a memorandum of understanding with Newfoundland and Labrador outline major new capacity additions, including hydro upgrades, new large hydro power plants, wind and solar development, and potential battery storage and natural-gas-fired generation. These resources are not included in the present assessment due to their early development stage but are expected to be incorporated gradually into future assessments.

Hydro Québec is a winter-peaking area. There were no significant LOLH or EUE estimated for Winter 2027–2028. For Winter 2029–2030, EUE and LOLH are above the elevated risk criteria See [Table 13](#).

Table 13: NPCC Québec Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	8	8	63
NEUE (ppm)	0.04	0.00	0.29
LOLH (hours per Year)	0.01	0.00	0.11
Category	Normal	Normal	Elevated
* Provides the 2024 ProbA results for Comparison			

SERC-East (Normal 2026/ Elevated 2027–)

SERC-East is projecting over 5.7 GW of coal unit retirements over the 10-year assessment horizon. These continued retirements from prior years continue to trigger reserve margin targets and ProbA thresholds for elevated risk. To offset the upcoming retirements, SERC-East has planned 2 GW of solar resources and 8.9 GW of gas additions over the next 10 years. The 2025 ProbA reveals elevated levels of risk occurring in both the 2027 and 2029 study years, as shown in [Table 14](#) below.

Table 14: SERC-East ProbA Summary of Results			
	2026*	2027	2029
EUE (MWh)	143	232	539
NEUE (ppm)	0.60	0.98	2.27
LOLH (hours per Year)	0.09	0.15	0.33
Category	Normal	Elevated	Elevated
* Provides the 2024 ProbA Results for Comparison			

Normal-Risk Area Details

All other assessment areas (see [Figure 1](#)) are classified as normal risk. In these areas, resource adequacy criteria are met, and there is a low likelihood of electricity supply shortfall even when demand is above forecasts or resource performance is abnormally low (e.g., above-normal forced outages or low VER performance).

Resource and Demand Projections

The [Capacity and Energy Risk Assessment](#) section is a forward-looking snapshot of resource adequacy that is tied to industry forecasts of electricity supplies, demand, and transmission development. Later sections in this report describe important trends in each of these forecast areas. The future electricity supply will come from a resource mix that is more variable, weather-dependent, and reliant on natural gas for fuel, requiring broad coordination and careful attention to manage reliability risks. Future electricity demand is being shaped by many factors that collectively influence peak demand forecast levels, peak seasons, and hourly profiles. Peak demand and energy forecasts are projected to continue rising dramatically over the 2025 LTRA assessment period, exceeding their highest rates in recent years. Ongoing challenges with resource and transmission development and the continued pace of generator retirements raise concerns that the risk assessment map will expand with more elevated- and high risk areas in the future.

Risk from Additional Generator Retirements

Accelerated retirements of the existing coal, natural gas, petroleum, and nuclear generators can negatively affect the resource adequacy and reliability of the BPS in the next 10 years. In the preceding [Capacity and Energy Risk Assessment](#), NERC accounted for nearly 92GW of nameplate of fossil-fired and nuclear generator retirements that are anticipated through 2035. NERC’s risk analysis did not include an additional 65 GW of nameplate fossil-fired generators that have announced plans to retire over the decade but have yet to enter deactivation processing with the planning authorities. Combined, the confirmed and announced-potential retirements over the next 10 years total over 105 GW in peak seasonal capacity, roughly 10 GW lower than the 10-year retirement projections in the 2024 LTRA (see [Figure 6](#)). Projected retirements overall, both confirmed and unconfirmed, have shrunk from the prior year’s LTRA as reliability needs have expanded with the continued growth in anticipated large-load interconnections. The initiation of market mechanisms like capacity accreditation has also more precisely highlighted the loss-of-load risks posed by a generation mix that has increasing amounts of variable resources. Growing demand and evolving planning methodologies have highlighted the potential need to keep resources, particularly non-variable resources, on-line longer than previously anticipated.

¹⁹ Confirmed generator retirements are reported to NERC by each assessment area in this 2025 LTRA development process. NERC obtained data on announced, unconfirmed generator retirements from Energy Ventures Analysis, Inc. and from each

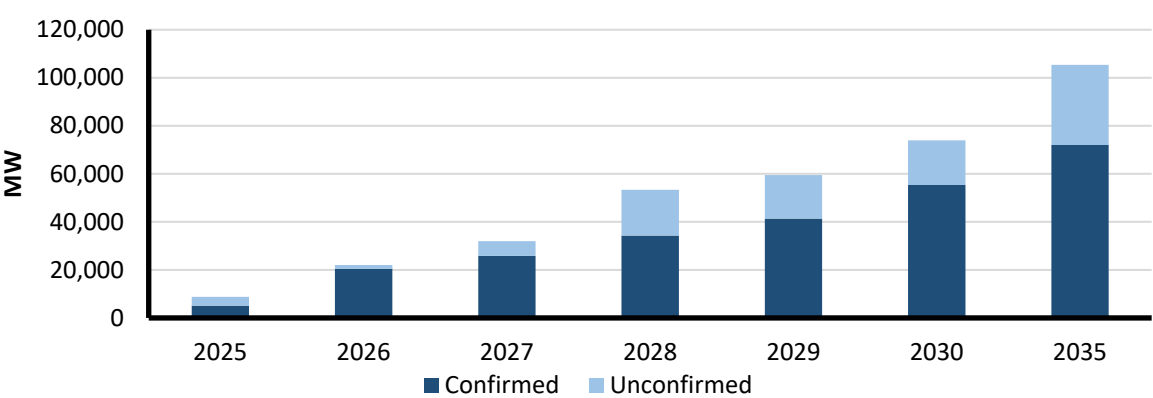


Figure 6: Projected Generation Retirement Capacity Through 2035

[Figure 7](#) shows the total capacity of reported retirements (i.e., reported to ISO/RTOs and planning entities) as well as owner-announced, unconfirmed retirements of fossil-fueled and nuclear generators across the BPS over the next 10 years in each assessment area.¹⁹ MISO continues to lead the assessment areas in the amount of projected retiring capacity at roughly 35 GW.

The yearly projections of future retirements and an assessment area view are provided in the [Risk from Additional Generator Retirements](#) section.

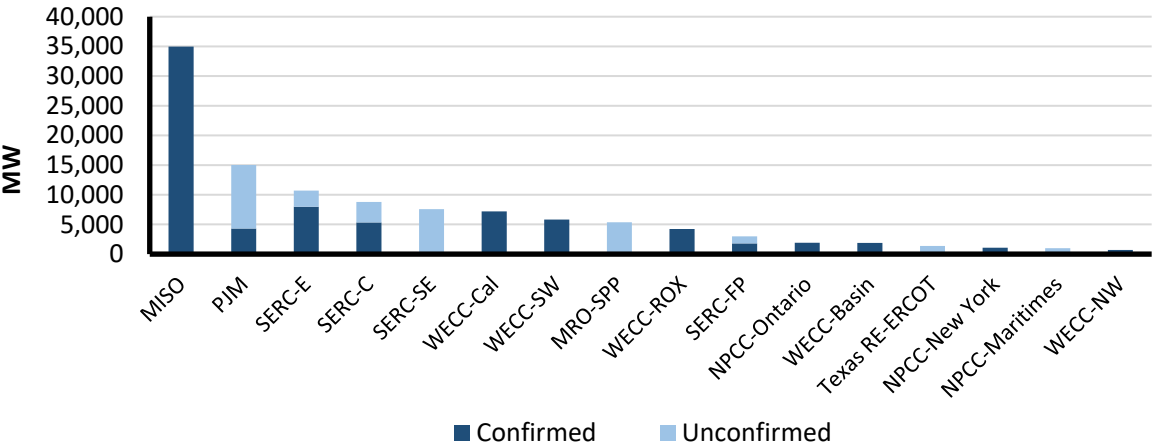


Figure 7: Projected Capacity Retirements of Nuclear and Fossil Generation 2025–2035

assessment area. Some sources of information on announced generator retirements include EIA 860 data, trade press, and utility integrated resource plans.

Reducing Resource Capacity and Energy Risk

The risk of electricity supply shortfalls in the assessment period can be lowered through the concerted efforts of resource and system planning stakeholders. The actions taken in electricity markets and regulatory jurisdictions with the improving trends noted previously provide examples of what can work: obtaining additional firm resources to meet resource adequacy targets, delaying generation retirements when reliability needs dictate, and using capacity targets and energy risk metrics based on better resource and demand models. Specific and actionable recommendations are contained in the [Executive Summary](#).

Resource Adequacy Program Attributes

Utilities, market operators, and regulators across North America are adapting their resource adequacy programs to address mounting challenges, including load growth, changing load behavior, resource mix transition, extreme weather, and evolving end-use need for electricity. NERC and industry stakeholders have recognized key resource adequacy program attributes that may become needed to address specific challenges faced by system planners and operators. [Table 15](#) includes five of these attributes and a brief description of how the attribute can be implemented. Assuring an adequate supply of electricity requires modernizing planning approaches. NERC encourages each assessment area to evaluate the program attributes needed to plan effectively for current and future challenges and implement those identified as essential.

Table 15: Resource Adequacy Program Attributes		
Attributes	Objective	Implementation
1. Uses Energy Risk Criteria	To ensure energy adequacy in systems with VER and fuel limitations, resource planners and markets need to augment existing 1-day-in-10 load-loss criteria with additional energy risk metrics.	Establish criteria based on EUE or similar energy risk metric(s).
2. Evaluates Resource Contributions at Risk Periods	As periods of shortfall risk on the system change with changing resource and demand characteristics (e.g., risks during winter and summer, peak net demand, and shoulder seasons), methods for assigning resource contributions in resource procurement and assessments must evolve.	Adopt effective load-carrying capability or other probabilistic methods for determining resource contributions during risk periods.
3. Load Forecasting Accounts for Growth Uncertainty	Future electricity demand is being influenced by the pace of electrification, industrialization, data center development, and DER adoption. Load forecasts for adequacy assessment and resource planning need to account for new growth patterns and uncertainty.	Capture the forecast drivers needed for the area and address uncertainties.
4. Considers Effect of Extreme Scenarios on Adequacy	To reduce the unique resource adequacy risks from wide-area extreme weather events, resource adequacy programs should evaluate potential system impacts and weather scenarios to mitigate risk to the BPS.	Analysis considers low-probability energy events (e.g., drought, multi-day weather patterns) and adequacy criteria include load-loss event magnitude and duration.
5. Includes Coordinated Interregional Transfer Capability	Interregional transfer capability can provide enhanced reliability and resilience and is most effective when resource adequacy programs include coordination with neighbors.	Model transfer limits and deliverability; implement processes for seams coordination.

Demand Trends and Implications

Demand and Energy Projections

Electricity peak demand and energy growth forecasts over the 10-year assessment period continue to climb higher than at any point in the past two decades. See [Figure 8](#) for seasonal peak demand growth over the current and prior assessment periods and [Figure 9](#) for net energy growth. Over the 10-year period, aggregated assessment area summer peak demand is forecast to rise by over 224 GW. This is 69% higher than last year’s 10-year growth projection of 132 GW. Winter demand growth continues to outpace summer demand growth: The 10-year aggregated winter peak demand is forecast to rise by over 245 GW, a 65% increase from last year’s 149 GW growth projection. Compound annual growth rates (CAGR) for summer and winter peak demand are the highest since NERC’s tracking started in 1995. A map of the primary demand drivers for the North American BPS is illustrated for each assessment area in [Figure 10](#).

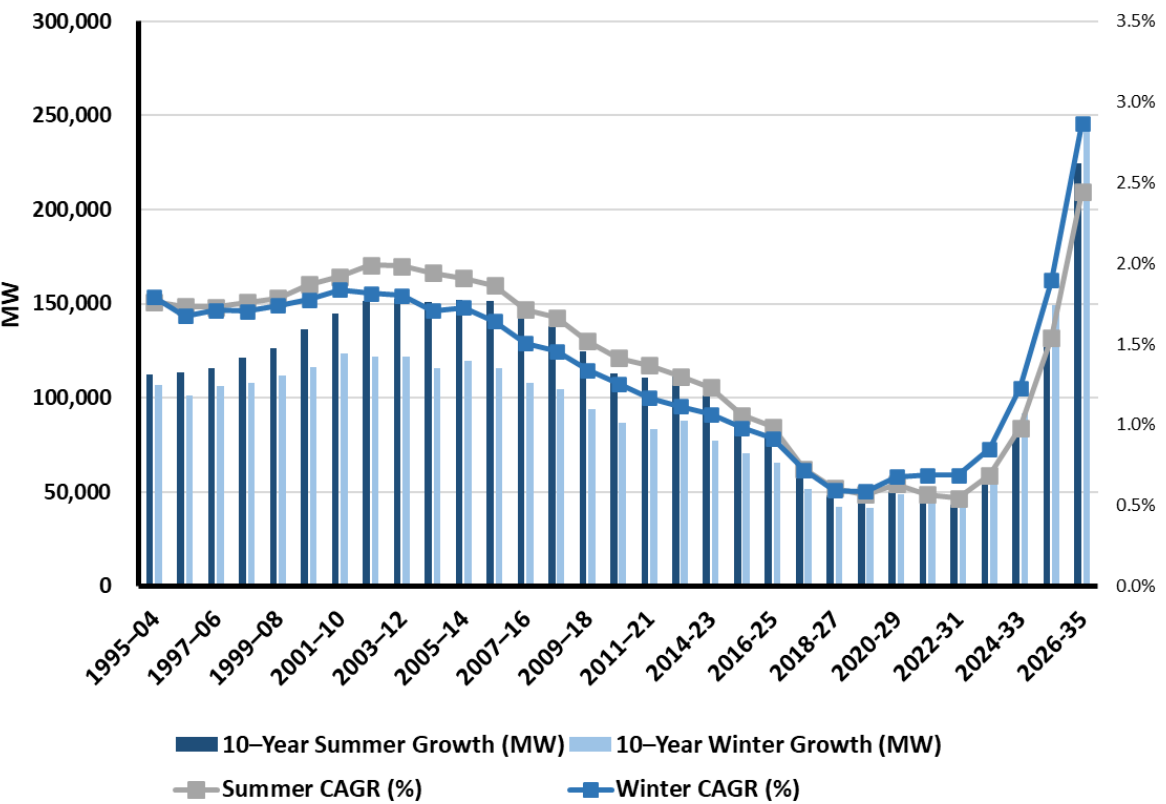


Figure 8: 10-Year Summer and Winter Peak Demand Growth and Rate Trends

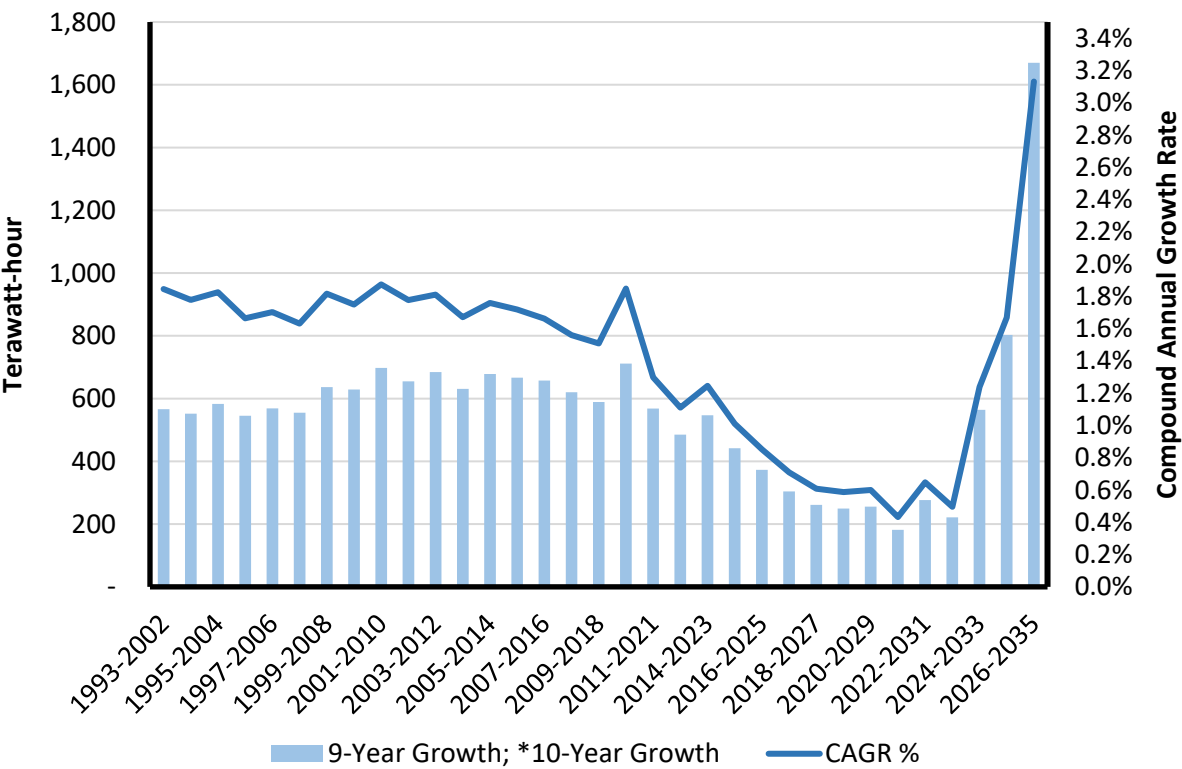


Figure 9: Net Energy for Load Growth and Rate Projections

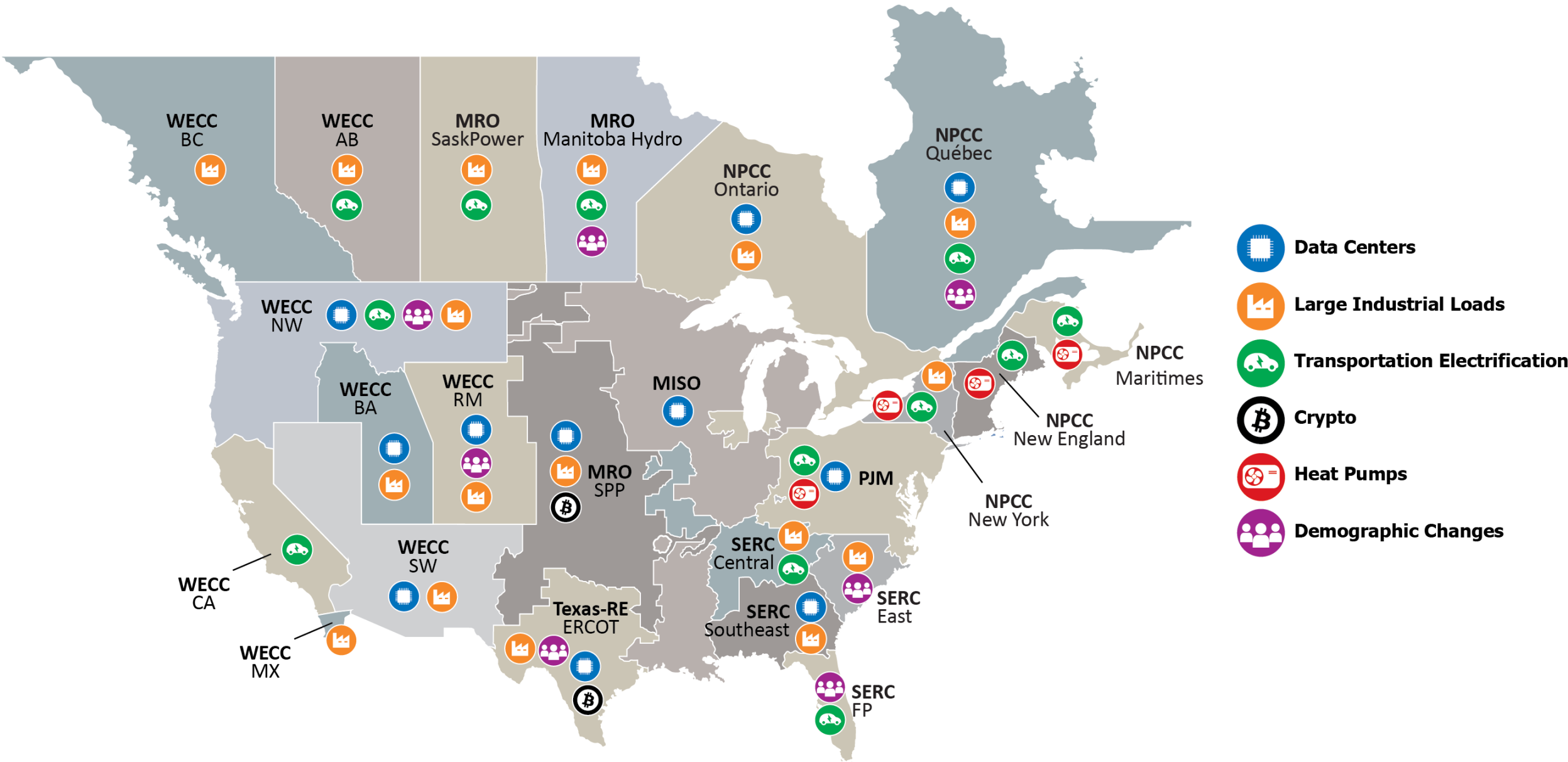


Figure 10: Primary Demand Drivers by Assessment Area

Data Centers and Large Commercial and Industrial Loads

New data centers for artificial intelligence and the digital economy account for most of the projected increase in North American electricity demand over the next 10 years. These and other large commercial and industrial loads are connecting rapidly to the BPS. The emerging large loads present unique challenges to forecasting and planning for increased demand.

Load forecasts collected by NERC for the 2025 LTRA reveal the massive build-out of data centers in many parts of North America. Texas, PJM, and the WECC assessment areas are reporting steep demand increases due primarily to new data centers and large loads. BAs within WECC reported that planned data centers account for an average of 10% of demand, with some BAs reporting as high as 40% of the demand forecast. See Figure 11 and Figure 12 for projections in ERCOT and most WECC assessment areas, respectively.

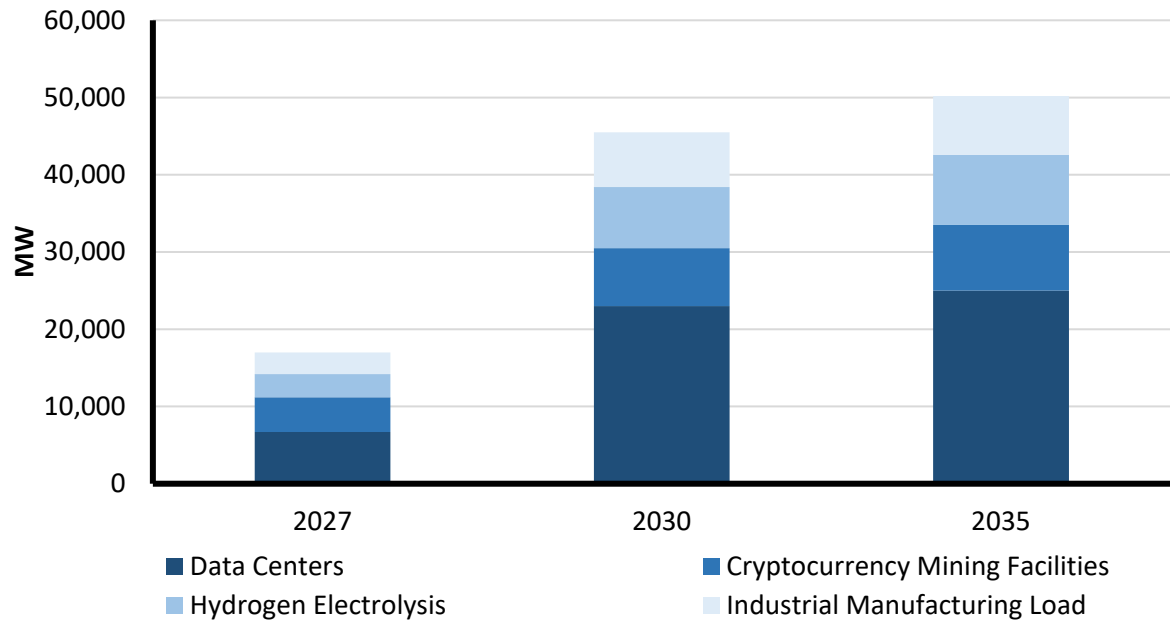


Figure 11: Large-Load Projection Breakdown in ERCOT

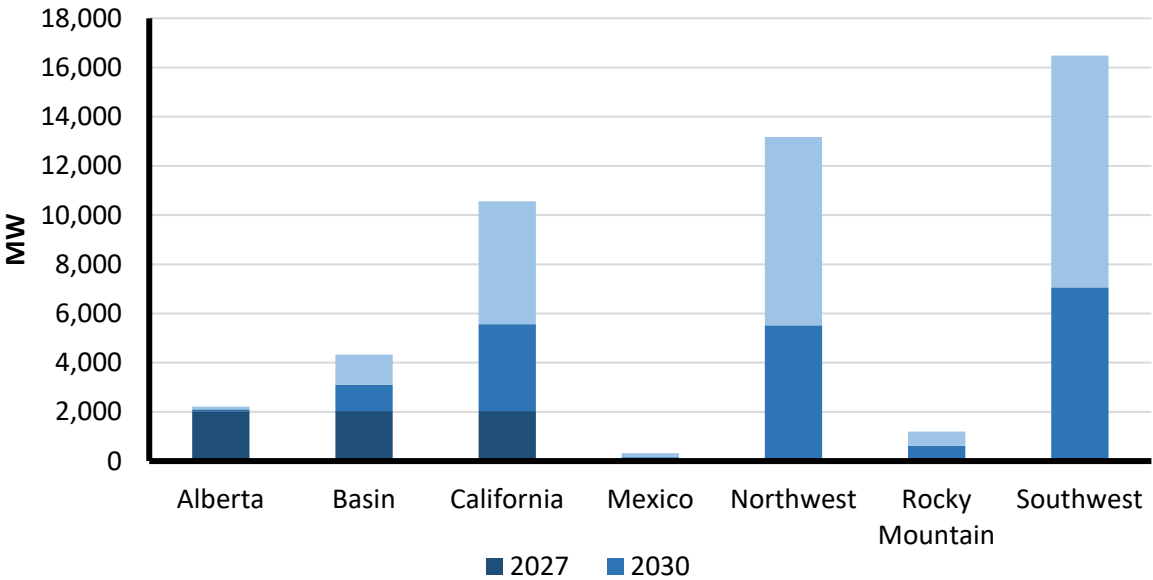


Figure 12: Large-Load Projection by Year in WECC Assessment Areas

Demand forecasts and large load projections throughout the LTRA are based on LSE and BPS system planner forecasts. LSE load forecasts are based on information from the interconnection process and agreements between utilities and owners of connecting loads, such as facility peak demand, load flexibility, and some operating characteristics. To be counted in load forecasting, data center projects have advanced from speculative and exploratory stages into development commitments necessary to drive grid planning studies. Consequently, data center and large load growth forecasts in the LTRA are likely to be more conservative than predictions from the technology industry or from economic, research, academic, and policy organizations.

In Texas, fluctuations in recent large-load interconnections activity continue to affect both near- and long-term demand expectations. Utilities and system operators are also gaining insights from large-load development and operating behaviors and applying them to future forecasts. Several projects have slowed or failed to materialize within the shorter-term horizon, while interconnection requests for later years continue to increase. New data center demand projections in Texas are reduced by almost 50% of their original requested load level to reflect the observed consumption behavior of existing data center sites during their initial operations. ERCOT also slashes most new large loads that have yet to enter a contract for transmission service from its long-term demand forecast and adjusts

expected in-service dates to account for historical delays. Similarly, PJM is refining processes for large load forecasting starting with its 2026 load forecast.²⁰

There is already evidence that large loads impact BPS reliability. For example, the Eastern and ERCOT Interconnections have observed load-reduction events²¹ with each Interconnection experiencing approximately 1,500 MW of voltage-sensitive load reduction. The event in the Eastern Interconnection was primarily attributed to data centers and other power electronic loads (PEL) transferring load to backup generation and caused frequency overshoot and high voltages. The ERCOT Interconnection event involved many different types of loads of varying size reducing consumption during an extended low-voltage period in West Texas due to a protection system misoperation. These load-reduction events highlight some of the potential risks posed by large loads utilizing the BPS and why NERC is closely examining this issue. NERC’s RSTC established a Large Loads Task Force (LLTF)²² to better understand the reliability implications of growth in large loads and develop solutions. The LLTF published the white paper *Characteristics and Risks of Emerging Large Loads*²³ in 2025, and another white paper, *Assessment of Gaps in Existing Practices, Requirements, and Reliability Standards for Emerging Large Loads*, is forthcoming.²⁴

Electrification and Demand Growth

Electrification of household appliances (e.g., heat pumps for household heating) and projections for electric vehicle growth over this assessment period are components of the demand and energy estimates provided by each assessment area. Since the 2024 LTRA, peak season CAGR has risen in all assessment areas except five: MRO-Manitoba Hydro’s winter CAGR fell from 1.79% to 1.37%, MRO-SaskPower’s winter CAGR fell from 1.32% to 0.89%, NPCC-New England’s summer CAGR from 1.28% to 1.05%, NPCC-New York’s summer CAGR from 0.87% to 0.84%, and SERC-East’s summer CAGR fell from 1.88% to 1.17%. Rising peak demand forecasts are contributing to the lower reserve margins projected for nearly all assessment areas.

Peak Season Transition

Some of the sharpest peak demand forecast increases and growth rates can be seen in winter seasons as electrification in heating systems and transportation influence forecasts. Dual-peaking or changing from summer to winter peaking is anticipated in several areas, including the U.S. Southeast and Northeast. Electrification of heating systems and the anticipated growth of electric vehicles (which are expected to charge overnight and coincide with periods of electricity demand for heating) are driving factors. Such changes have wide-ranging implications for how the grid and resources are

planned and operated. For example, resource output and fuel risks are significantly different in winter, requiring the focus of resource adequacy processes to change. The following are the areas that anticipate a change from summer-peaking systems to winter-peaking (or dual-season peaking) systems and the approximate year of the transition:

- NPCC-New England (mid-2030s)
- NPCC-New York (late-2030s)
- NPCC-Ontario (2030; dual-season peaking)
- Texas RE-ERCOT (2035)

In the U.S. Southeast, SERC-Central and SERC-East became dual-peaking systems in recent years. SERC-Southeast recently began experiencing slightly higher peak demand in winter compared to summer. In Canada, WECC-Alberta has been operating as a dual-peaking system.

Demand Response

Demand-side management programs are growing for many assessments areas. DR is one form of demand-side management. It consists of mainly commercial and industrial end users that have entered into agreements with load-serving entities to curtail demand when needed by grid operators. DR can assist with reducing load during critical periods of increased demand, such as heat waves or winter storms. Figure 13, Figure 14, and Figure 15 show the increasing projections for DR in the first year of the forecast for the past five LTRA reports in Texas RE-ERCOT, NPCC-Québec, and NPCC-New York, respectively. Other forms of demand-side management include EE and conservation programs administered by utilities. The reported contributions from DR, EE, and conservation programs reduce total electricity demand in load forecasts and provide reliability benefits that are accounted in LTRA reserve margin calculations and the ProbAs.

²⁰ Planned revisions to PJM’s treatment of large load forecasts from PJM’s Load Analysis Subcommittee: [20250613-item-03--large-load-adjustment-process-improvement-discussion.pdf](#)
²¹ “Incident Review - Considering Simultaneous Voltage-Sensitive Load Reductions,” NERC, Jan. 2025. Available: https://www.nerc.com/pa/rrm/ea/Documents/Incident_Review_Large_Load_Loss.pdf

²² NERC Large Loads Task Force webpage: [Large Loads Task Force \(LLTF\)](#)
²³ The LLTF’s *Characteristics and Risks of Emerging Large Loads* White Paper
²⁴ The LLTF’s [action plan](#) is updated regularly and contains links to white papers, guidance, and presentations.

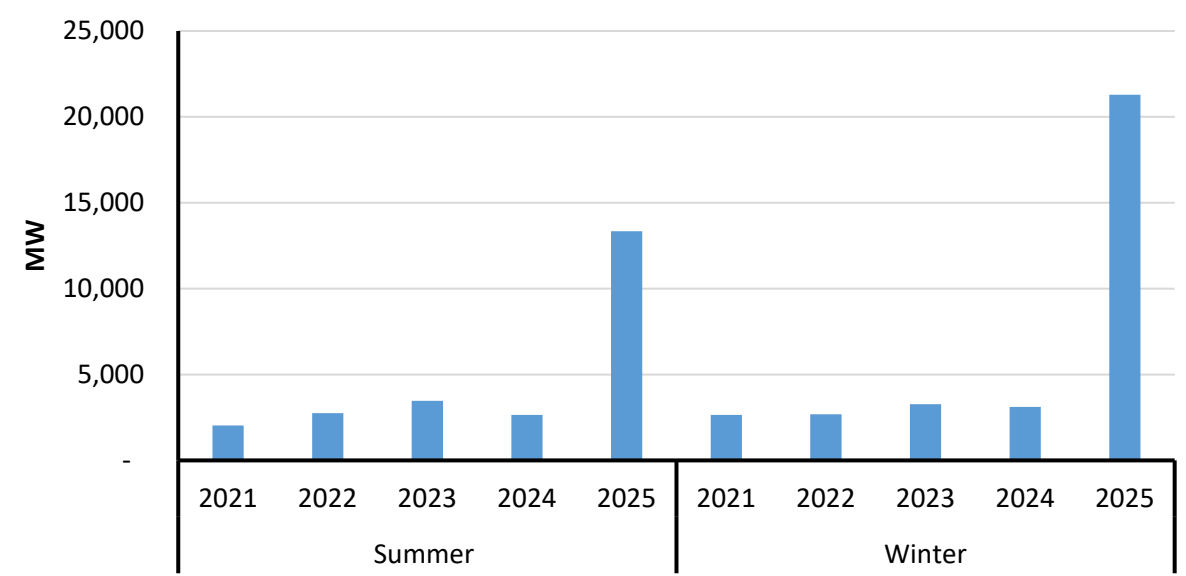


Figure 13: Texas RE-ERCOT Demand-Response Trend in Past Five LTRAs (Year 1)

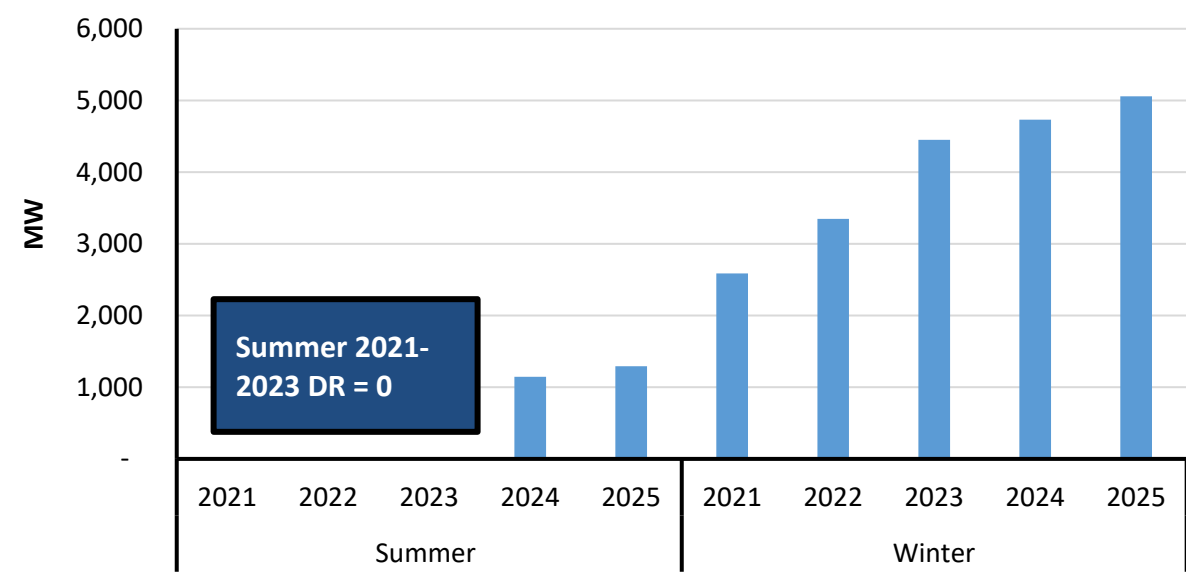


Figure 14: NPCC-Québec Demand-Response Trend in Past Five LTRAs (Year 1)

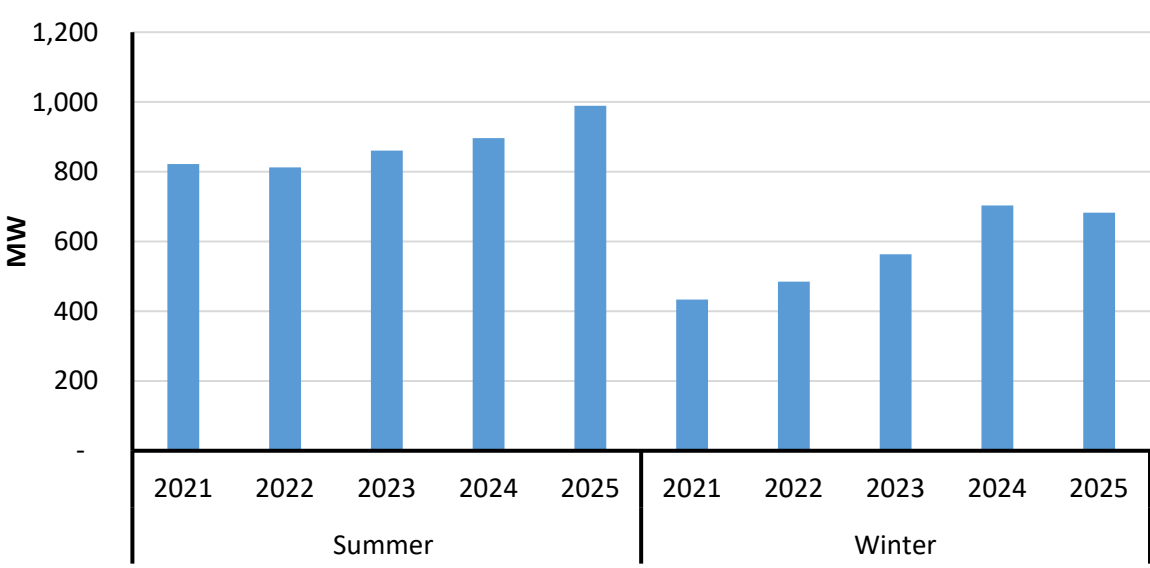


Figure 15: NPCC-New York Demand-Response Trend in Past Five LTRAs (Year 1)

Reliability Implications

Demand and energy growth projections in this assessment period provide both challenges and opportunities for electric grid reliability. Planning for resource and transmission adequacy requires accurate long-term forecasting, but future demand and energy use will be influenced by many factors, including the economy, energy policies, technology development, weather, and consumer preferences. Changing patterns in electricity use, load behavior, and DER performance affect the accuracy of operational load forecasts that are essential to grid operators. Large flexible loads and demand-side management programs hold promise for peak load management capabilities that can reduce the risk of firm load interruption.

Anticipating large commercial and industrial loads, electrification, electric vehicle adoption, and the impacts of energy transition programs on future demand and energy needs will require even more focus for planners and operators. Peak demand forecast changes in the past year noticeably affected resource adequacy for many areas. A confluence of factors (economic, energy policies, technology development, and consumer preferences) has the potential to fuel continued growth.

Resource Mix Changes

On-peak resource capacity increased approximately 6.2 GW across the interconnected North American BPS over the last year. This is down from approximately 8.3 GW of net on-peak capacity additions reported a year ago in the *2024 LTRA*. Net capacity from fossil-fueled generators continued to decline at a rapid pace over the last year with approximately 21 GW leaving the system. Continent-wide, net BPS additions of battery, wind, and solar resources totaled 23 GW over the last year (see [Table 16](#)).

Table 16: Existing BPS Resource On-Peak Capacity			
Resource Type	2024 Capacity (MW)	2025 Capacity (MW)	Difference (MW)
Coal	180,402	166,799	– 13,603
Petroleum	30,987	27,931	– 3,056
Natural Gas	484,148	479,901	– 4,247
Biomass	7,381	7,181	– 200
Solar	66,293	70,723	+ 4,430
Wind	31,370	35,121	+ 3,751
Geothermal	3,881	2,932	– 949
Conventional Hydro	105,792	111,117	+ 5,325
Run-of-River Hydro	2,047	2,017	– 30
Pumped Storage	19,422	19,734	+ 312
Nuclear	105,384	105,389	+ 5
Hybrid	1,322	1,102	– 220
Other	774	830	+ 56
Battery	8,587	23,267	+ 14,680
Total	1,047,790	1,068,514	+ 6,254

Like last year, the anticipated BPS generating capacity (i.e., capacity from existing generation + expected additions – expected generator retirements) fell short of industry projections reported in the LTRA, furthering the concerns that accelerating peak demand growth is continuing to outpace the supply resources.

Figure 16 compares this year's existing and Tier 1 nameplate and on-peak capacity against the actual current capacities derived from data collected for this year's LTRA. Bars that cross the 100% line represent resources with actual additions exceeding projections from 2024, and bars that fall to the left of the 100% line represent resource types with actual additions less than projected in 2024.

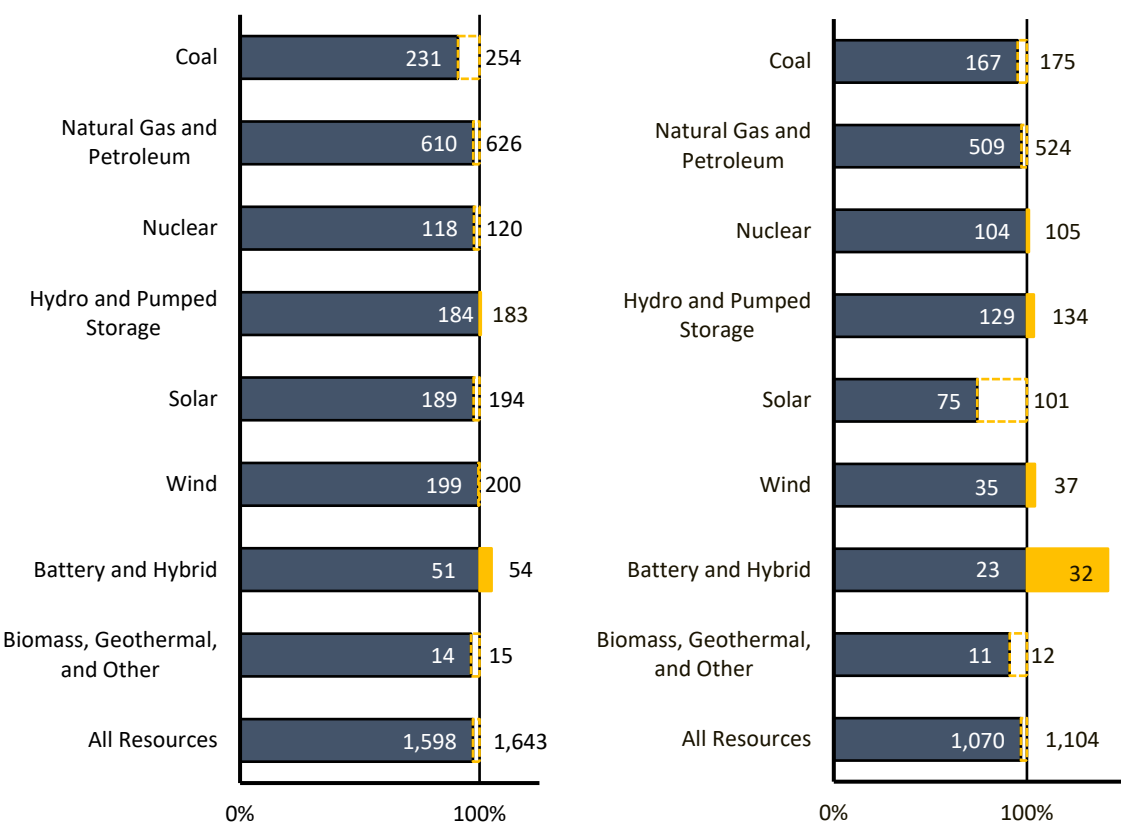


Figure 16: Comparison of North America's 2025 Existing and Tier 1 Nameplate (Left) and On-Peak (Right) Capacities in GW to 2024 LTRA Projections

Continuing the trend from last year, battery energy storage systems were added to the system faster than expected, while coal, natural gas and petroleum, and solar resources were once again over-projected. As coal capacity continued its decline because of plant retirements and age-related derating, its over-projection from last year means that it left the system faster than anticipated in 2025.

Notably, the capacity contribution of VERs, including solar, wind, battery, and some types of hydroelectric generation, to serving load at peak demand differs from the nameplate, or installed capacity. The right plot in **Figure 16** above includes a complementary view to the on-peak projections using nameplate capacity to accommodate different capacity accounting methods. Both 2025 on-peak and nameplate solar was over-projected across the North American BPS last year. These over-

projections continue to support electric industry reports of construction delays and project withdrawals prior to commercial operations that prevented the expected interconnection of new resources.

Planned On-Peak Capacity Additions

New resources are added to the BPS through each area’s interconnection planning process. Entities have expressed concerns that the pace of resource additions has been too slow to meet demand growth and future retirements in the existing generator fleet. [Figure 16](#) above highlights that industry participants are expecting peak demand growth of nearly 250 GW over the next 10 years because of accelerating demand for a variety of electricity users. Planning for such explosive growth and the uncertainty about its magnitude and timing is a complicated challenge for system planners.

[Figure 17](#) illustrates the planned on-peak capacity additions and subtractions across the North American BPS over the next 10 years. Additions are illustrated by the positive portions of the stacked columns and include both Tier 1 and Tier 2 additions. In general, Tier 1 resources are in the final stages for connection, while Tier 2 resources are further from completion (see [Demand Assumptions and Resource Categories](#)). Some projects that are in the earlier stages of the interconnection queue process will be withdrawn before completion due to supply chain issues, planning and siting challenges, and business or economic factors. Deratings and retirements of the existing fleet are stacked in the negative Y direction with diagonal hatching patterns.

To keep up with forecasted demand growth and generator retirements, planned resources with interconnection agreements will need to come in on time, and additional resources in development must mature through the interconnection process quickly (see [Figure 18](#)). The on-peak capacity of approved resource additions found in integrated resource plans (IRP) and ISO/RTO expansion plans through 2028 is able to keep pace with the aggregated peak demand forecasts of all NERC assessment areas. Beyond 2028, new approvals for resource additions are required to maintain robust growth. Furthermore, additional generation is needed to make up for capacity lost to generator retirements. Considering the generator retirements depicted in [Figure 17](#), there are only approximately 60 GW of net additions planned in the most certain Tier 1 category over the next 10 years. Another 190 GW of Tier 2 or other resources (70% of Tier 2’s 10-year total) would need to complete the interconnection planning process and reach commercial operations to meet the expected demand growth, illustrating the pressure on resource and system planning to rapidly add resources. DR programs, EE improvements, and transmission development to enable interregional transfers that take advantage of geographic diversity can also support growing demand.

To respond to this urgent need for new resources, independent system operators and regional transmission organizations have been developing new market structures and products to retain

capacity and expedite interconnection of new generation and storage. Three such programs established by ISO/RTOs are PJM’s [Reliability Resource Initiative](#), MISO’s [ERAS](#) process, and SPP’s [Expedited Resource Adequacy Study](#).

In a shift from a key insight from the 2024 LTRA, solar PV is no longer the sole, predominant generation type planned over the next 10 years. New battery resource projects have grown to match solar projections, and together, solar and battery capacity additions represent two-thirds of the Tier 1 and Tier 2 resources in this year’s 10-year LTRA study period. Natural-gas-fired generator additions represent 15% of the projected capacity additions followed by wind and hybrid at 8% each. While interconnection queues continue to swell, considerable uncertainty surrounds the timing and amount of resource additions. Overall, on-peak resource capacity in Tier 1 and Tier 2 has grown only modestly since the 2024 LTRA by 7 GW (1.7%) as compared to a year-over-year growth of 44 GW last year.

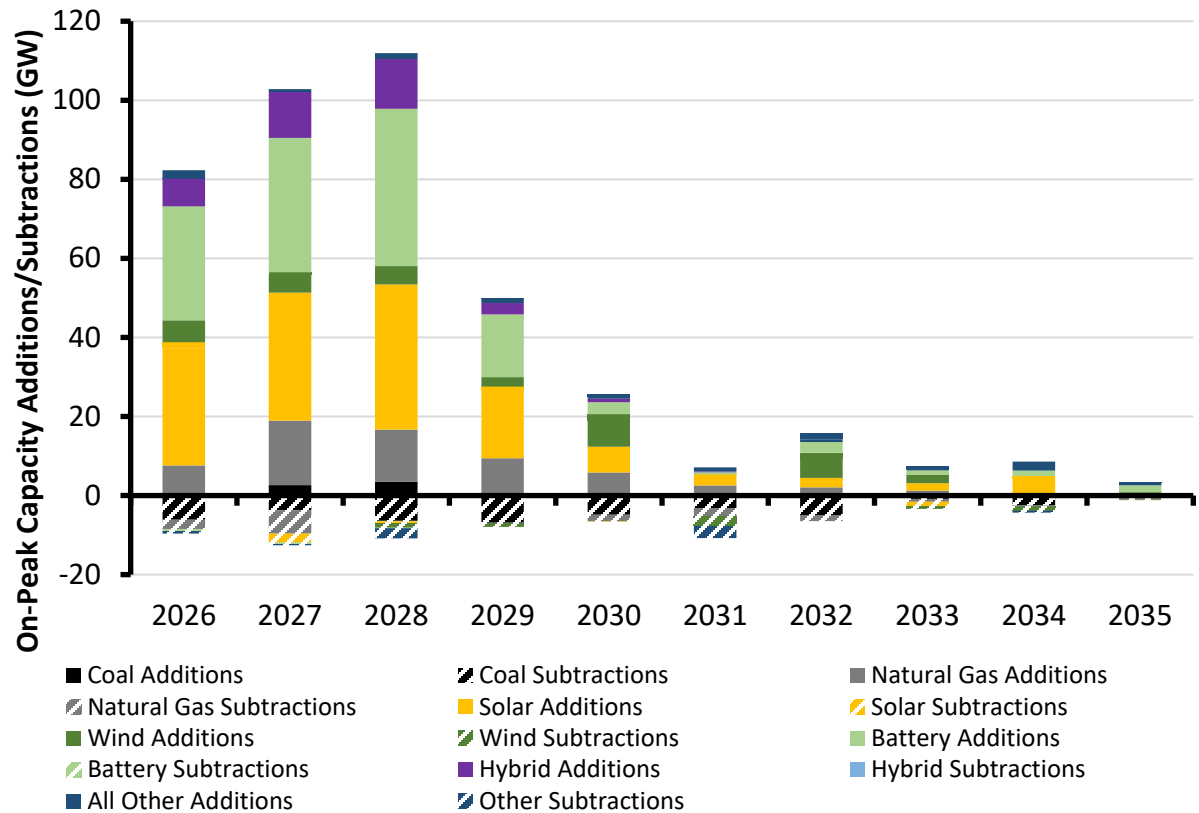


Figure 17: Projected Annual On-Peak Capacity Additions and Subtractions by Resource Type and Net Cumulative Capacity Changes

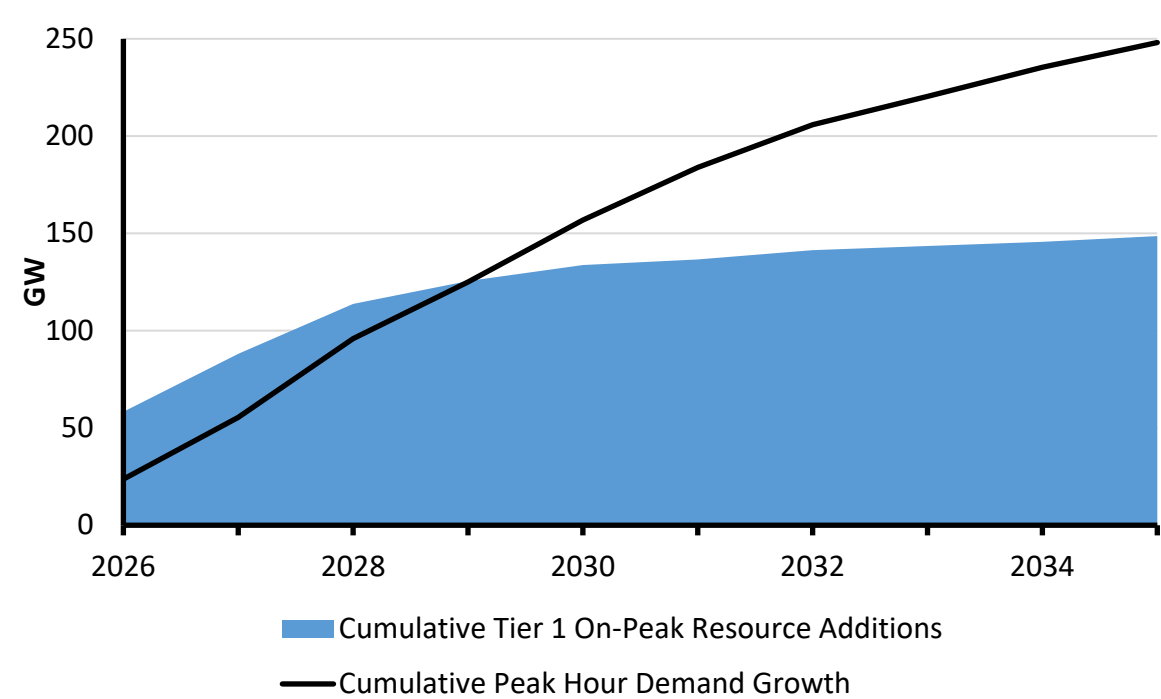


Figure 18: Expected BPS Resource Additions (Tier 1) and Aggregated BPS Peak Demand Growth Through 2035

Increasing On-Peak Share of Variable Resources

Year-over-year increases in the fraction of on-peak capacity provided by VERs—run-of-river hydro, solar, and wind—have continued since the 2024 LTRA with VER on-peak contributions increasing from 9.5% to 10.2%. This observed trend is projected to continue through 2035 with shares of on-peak VER capacity projected to rise to between 15% and 20% depending on the completion and interconnection of Tier 1 and Tier 2 resources. [Figure 19](#) shows existing on-peak capacity by resource type for 2024 and 2025 along with projected on-peak capacity by resource type for 2035 with Tier 1 and Tier 2 additions. Resource types with on-peak shares less than 5% are not labeled with their contribution fraction but are stacked in the graphic.

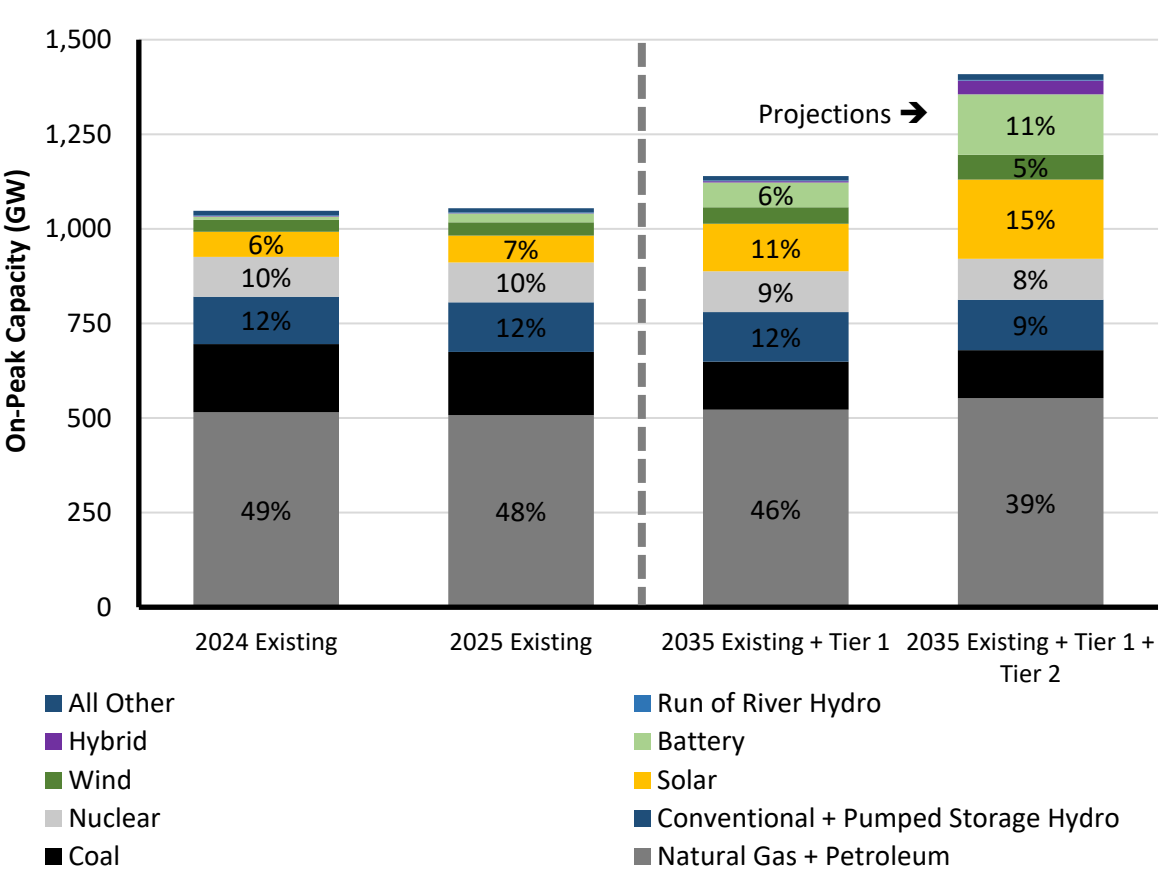


Figure 19: North America On-Peak Capacity Shares by Resource Type

Like last year, a relatively small change in total on-peak capacity was observed, but the continued trend of increasing VER share highlights that important reliability attributes continue to leave the system. Non-variable generation—including coal, petroleum, natural gas, biomass, geothermal, conventional hydro, and nuclear—as well as hybrid or storage systems can ramp up or down in response to demand. Non-variable resources can also provide other ERSs like system inertia, dynamic reactive support, and frequency response for stable grid operation. Many of the variable resources that are being added to the grid to replace non-variable resources cannot provide the same ERSs in their current configuration. This deficiency is amplified in the winter when on-peak contributions from variable resources are diminished by changing weather and environmental conditions.

System Frequency Response Analysis

Despite lower inertia from retiring synchronous generators and greater penetration of inverter-based resources, all four Interconnections expect adequate, diverse frequency response capabilities and a low risk of under-frequency load shedding (UFLS) activation. In preparing the 2025 LTRA, NERC worked with the Regional Entities and system planners to assess the frequency response capability of the projected resource mix through 2027 on an Interconnection basis. The findings are summarized in Table 17.

Table 17: Measures of Frequency Response		
Measure	What it Measures	Summary Assessment Findings
Synchronous Inertial Response (Measure 1)	The minimum inertial response amount (total stored kinetic energy) projected in each Interconnection	Despite the retirement of synchronous generation over the past eight years, there appears to be more than sufficient inertia within all Interconnections. ERCOT’s use of load response to respond to frequency disruptions is effective in supporting low-inertia conditions.
Rate of Change of Frequency (Measure 2)	The calculated rate of frequency decline within the first 0.5 seconds following the largest credible contingency	No negative trends identified. Texas RE-ERCOT studies show that load response is extremely effective in arresting frequency due to its ability to perform very quickly.
Frequency Response Performance (Measure 4)	Simulated dynamic behavior of an Interconnection’s response to the largest credible contingency	Simulations in both the Eastern and Western Interconnection show sufficient frequency response in future planning cases.

The results of analysis for each Interconnection are in Table 18. Non-synchronous resources have increased in all Interconnections since the last LTRA frequency response analysis in 2022. Each interconnection continues to project sufficient frequency response ERSs in the near term and have low likelihood of UFLS activation during a disturbance. These results were determined by dynamic

²⁵ EIPC Frequency Response Report

²⁶ 42.9% is the penetration of utility-scale non-synchronous generation. The Western Interconnection has a significant amount of DERs that are also non-synchronous. When DERs are included, the non-synchronous penetration was 54.9%.

²⁷ ERCOT procures responsive reserve service to protect from involuntary under frequency load shed after loss of two largest generating units at a single plant (2,805 MW). In March 2020, a new subproduct of responsive reserve service was

studies performed for the Eastern, Western, and Québec Interconnections and analysis of operational procedures for the Texas Interconnection.

Table 18: Summary of the Results of NERC Frequency Response Sufficiency Assessment				
Interconnection	Highest Non-Synchronous Penetration at Minimum Inertia Studied	Number of Critical Inertia Conditions Reached?	Lowest Frequency Nadir Observed in Planning Studies	Likelihood of Credible Disturbance Resulting in UFLS Activation
Eastern Interconnection	17.9% ²⁵	0	59.93 Hz	Low
Western Interconnection	42.9% ²⁶	0	59.65 Hz	Low
Texas Interconnection	65.7%	0	N/A	Low ²⁷
Québec Interconnection	37%	0	N/A	Low

Increasing Natural Gas Reliance

In 2024, natural-gas-fired power plants generated approximately 43.4% of all electricity generated in the United States, according to the U.S. Energy Information Administration, up from 43.2% in 2023. As of August 2025, natural-gas-fired power plants in the United States are on track to generate a slightly smaller share of electricity this year in comparison to last year, but accelerating energy demand through the remainder of the year and projected increases in net energy for load over the next 10 years indicate that natural-gas-fired generators will remain critical resources for BPS reliability in many areas.

Natural-gas-fired generators are especially important during the winter. Winter peak electricity demand in most areas occurs during early morning hours when unavailability of weather-dependent resources leads to a surge in natural-gas-fired generation’s share of the resource mix. Severe winter weather events in 2021 and 2022 provide stark evidence of the critical nature of natural gas as a generator fuel and the importance of secure fuel supplies during times of extreme electricity demand.

introduced, FFR, which is triggered at 59.85 Hz within 0.25 seconds. Up to 450 MW of FFR can be procured as a part of responsive reserve service. This product is still going through implementation stages due to required changes to ERCOT systems.

Overall, 13 out of 23 assessment areas are adding capacity to their fleet of natural-gas-fired power plants over the next 10 years, amounting to slightly more than 12 GW of new natural-gas-fired winter capacity if only the most certain Tier 1 resources come on-line. That number jumps to 41 GW of new natural-gas-fired winter capacity if both Tier 1 and Tier 2 resources come on-line (see [Figure 20](#)). Importantly, the vast majority of natural-gas-fired Tier 1 and Tier 2 additions—11 to 39 GW—are projected to come on-line in the next five years.

The timing and magnitude of natural-gas-fired generator additions remains uncertain in today’s energy system planning environment. Multiple areas are conducting expedited resource assessments and interconnection process reforms with goals of adding more generator capacity to the grid over the next few years to meet rapidly accelerating electricity demands, particularly due to large-load addition. The early project submissions and selections from these programs indicate that actual natural-gas-fired additions may exceed previous industry projections in some areas. For instance, PJM Interconnection’s [Reliability Resource Initiative](#) has led to the selection of approximately 8 GW of natural-gas-fired generator uprates and additions out of the nearly 17 GW of natural-gas-fired projects submitted for consideration. Round one selections for MISO’s [ERAS](#) include approximately 4 GW of natural-gas-fired additions out of the 20 GW submitted to date, and SPP’s *Expedited Resource Adequacy Study* includes approximately 9 GW of natural-gas-fired winter capacity additions in its interconnection queue. Most of these expedited additions that have been selected across all three programs have applied to come on-line before 2030.

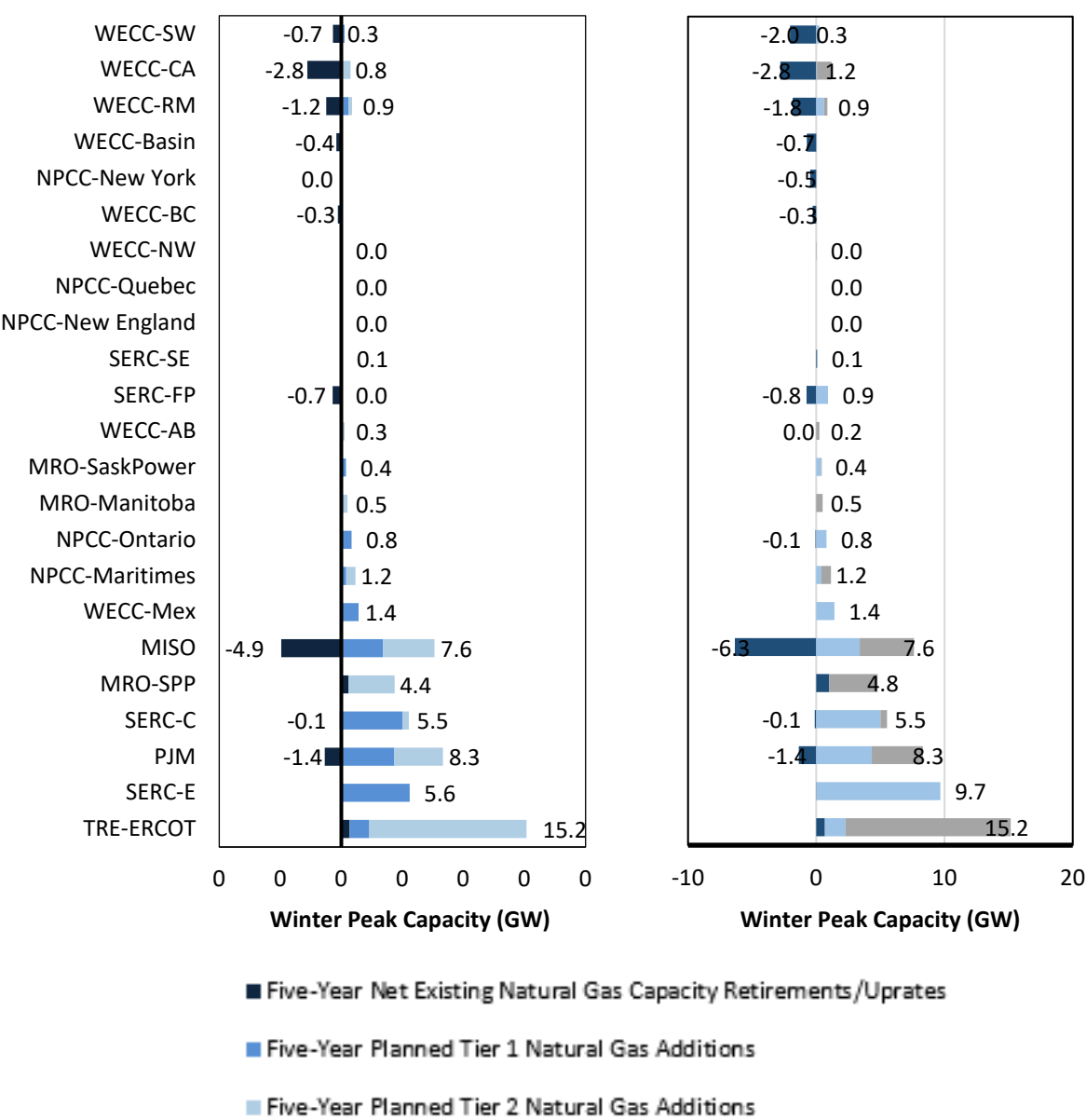


Figure 20: 5-Year (Left) and 10-Year (Right) Projected Natural-Gas-Fired Winter Capacity Additions by NERC Assessment Area

Natural Gas Infrastructure Development

Natural gas system planners have increasingly been coordinating with electric system planners to prepare for large additions to the natural-gas-fired power plant fleet. However, processes, regulations, and financial mechanisms that underpin capital investments and expansion of the natural gas pipeline and production system at times do not align with the variable operations of critical natural-gas-fired generators. For these reasons, among others, a significant percentage of natural-gas-fired power plants continue to rely on interruptible, or non-firm, supply and transportation arrangements. Non-firm natural gas supply and transportation is generally sufficient for electric generators most of the year. However, during extreme cold weather, demand for natural gas for both electricity generation and space heating can both dramatically increase. In these instances, generators that lack firm supply and transport arrangements are at risk of fuel unavailability. When winter weather also impacts gas production facilities, the resulting imbalance in pipeline injections and withdrawals can imperil even firm pipeline customers’ supply as preparatory linepack is rapidly depleted.

There is a possibility that generators in the areas that are adding the most gas resources—MISO, MRO-SPP, PJM, SERC-C, SERC-E, and TRE-ERCOT—could secure additional firm fuel supplies from natural gas system projects planned or proposed over the next decade. **Figure 21** shows the amount of incremental natural gas pipeline capacity with in-service dates spanning the next five years. In total, S&P Global Energy projects that roughly 45 BCF/day of incremental natural gas pipeline capacity created by additional compression, expansions, pipeline repurposing, new pipelines, or reversal of flow directions will be built over the next decade. About one-third of this incremental capacity has gained regulatory approval and moved into the more formal stages of project development. Of the 15 BCF/day of regulatory approved gas pipeline capacity additions, only 5 BCF/day is planned to serve natural gas demand in the states outside of the Gulf Coast region.

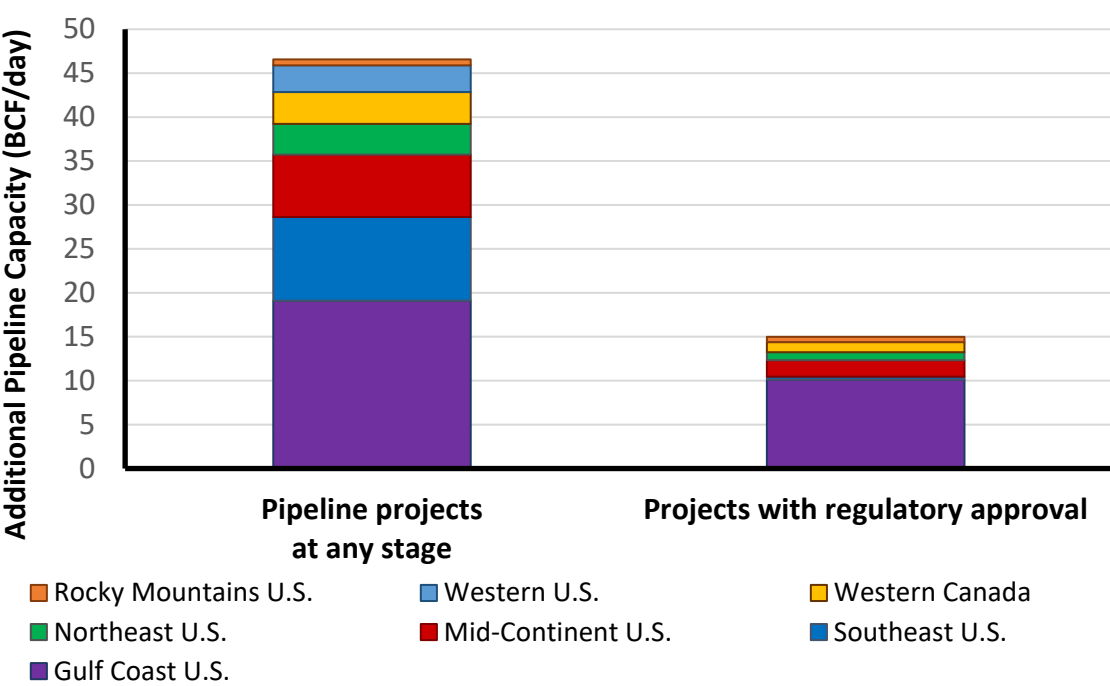


Figure 21: Projected Natural Gas Pipeline Capacity Expansion Projects by Project Stage (Source: S&P Global Energy)

The nearly 40 GW of natural-gas-fired winter capacity additions in the six areas adding the most gas resources could consume as much as 6–11 BCF/day of natural gas during a peak winter day after factoring plant type, efficiency, and whether the generator designated by its grid operator as a critical on-peak resource. While enough incremental pipeline additions to support this anticipated increase in gas demand seem to be moving through the natural gas project development process in those regions (see [Figure 22](#)), generators will need to compete with other pipeline customers for firm supply and delivery during periods of high gas demand. The magnitude of gas pipeline capacity additions suggests that there may be promising opportunities for generators to procure firm gas pipeline and supply contracts, but regulatory approval does not assure construction or commercial operation. In addition, if firm gas contracts cannot be secured for coincident high gas and electricity demand periods, like winter, ongoing critical generator projects might need to consider backup fuel capabilities so that they can assure fuel availability.

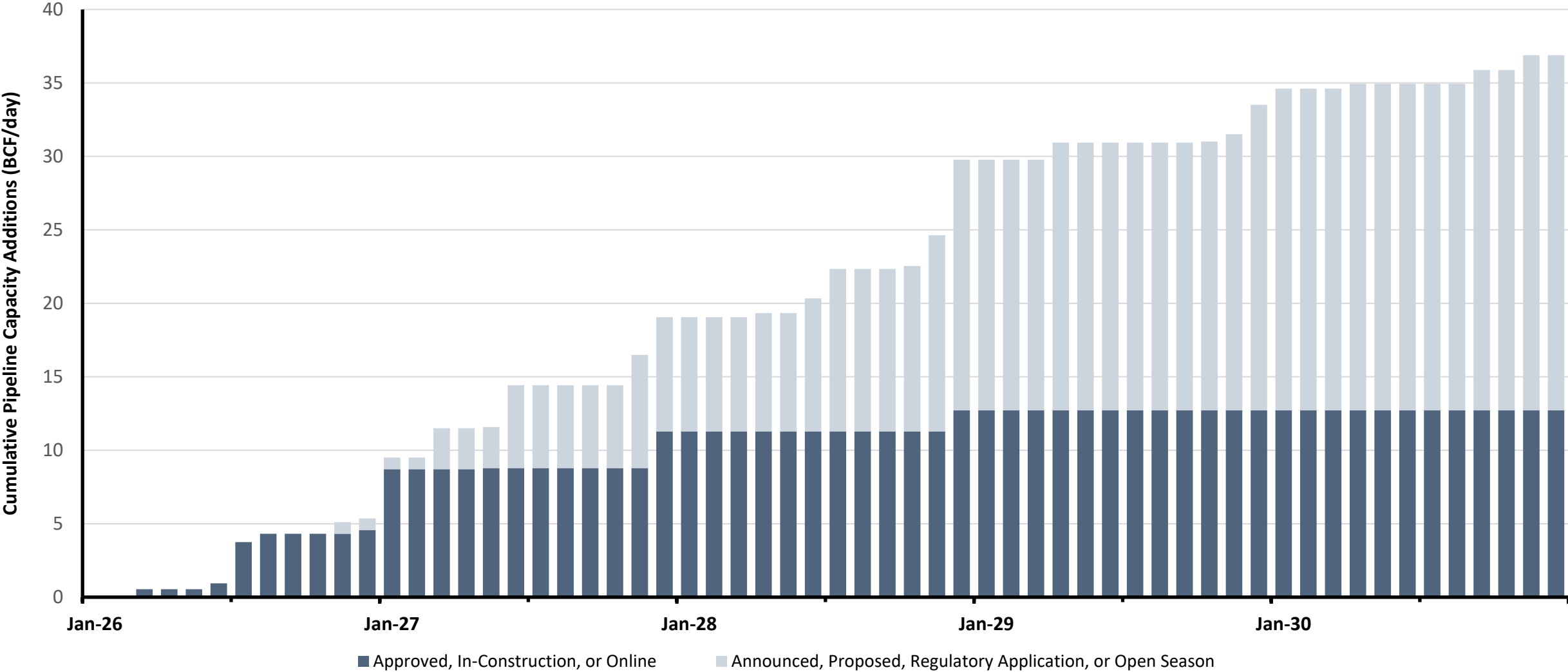


Figure 22: Projected Natural Gas Pipeline Capacity Expansion Projects Ending in MISO, PJM, SERC-C, SERC-E, SPP, and TRE-ERCOT Areas (Source: S&P Global Energy)

Transmission Development and Interregional Transfer Capability

Transmission Projects

This year’s cumulative level of 41,000 miles (66,000 km) of transmission (>100 kV) under construction or in various stages of development for the next 10 years (see [Figure 23](#)) is substantially higher than the 2024 LTRA 10-year projections (28,275 miles or 45,504 km). Transmission in construction has yet to increase substantially; rather, the large increase in transmission projects is seen in planning phases.

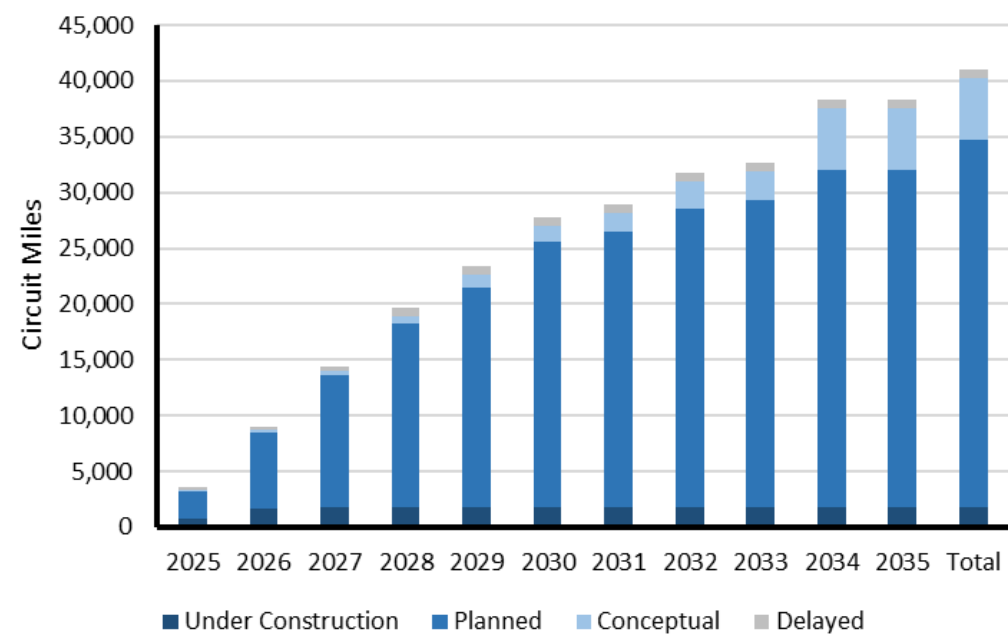


Figure 23: Future Transmission Circuit Miles >100 kV by Project Status²⁸

Transmission flow patterns are changing and becoming more dynamic with resource shifts. New transmission projects are being driven by reliability, which includes efforts to replace aging infrastructure, integrate renewable generation, retire existing power plants, or meet increased demand forecasts. One such example is Hydro-Québec’s plan to add significant new generating capacity by 2035, which necessitates several major EHV transmission projects. Similarly, several PCs have recently approved, or are actively contemplating, expansive EHV overlays on their systems to

²⁸ The column at right is the total transmission projects reported to NERC and includes projects that did not specify an expected in-service date.

address a variety of needs, including ERCOT, SPP, MISO, PJM, British Columbia, and IESO. [Figure 24](#) shows the percentage of future transmission circuit miles by primary driver. Most projects reported this year have been initiated for the purpose of grid reliability, which generally includes transmission projects that are needed to ensure that the BPS operates within established limits and design criteria.

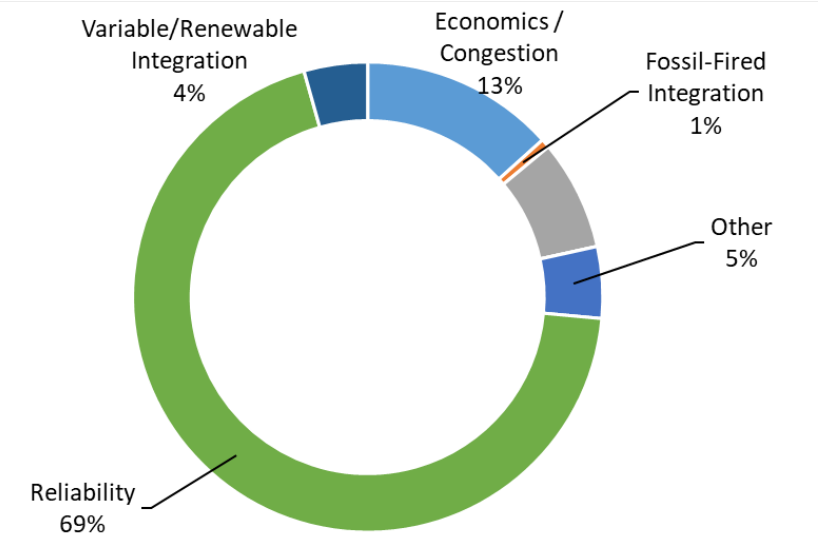


Figure 24: Future Transmission Circuit Miles by Primary Driver

There were 14,150 circuit miles (22,775 km) of reported transmission in development with an operating class greater than 400 kV (about 35% of the total miles in development). Nevertheless, intraregional transmission projects continue to greatly outnumber interregional transmission expansion. These interregional transmission projects can allow entities to take advantage of geographic diversity during extreme weather, such as Winter Storm Elliott,²⁹ including scenarios identified in the ITCS. Only 38 of the 863 transmission projects in development are for tie-lines and tie-line upgrades (down from 70 in last year’s LTRA), which can support transfer capability between neighboring BA areas, including high-capacity dc interconnections, such as the 1,200 MW Appalachies-Maine (NECEC) and the 1,250 MW Hertel-New York (CHPE) projects. NYISO has identified a reliability risk if the CHPE project is not completed in a timely fashion. See the transmission summaries at the end of each assessment area’s pages (in the [Regional Assessments Dashboards](#)) for current transmission development details.

²⁹ [Winter Storm Elliott Report: Inquiry into Bulk-Power System Operations During December 2022 | Federal Energy Regulatory Commission](#)

Transmission development in some areas is hampered by growing risks in procurement and supply chain delays as well as regulatory obstacles, such as siting and permitting. Other reasons for delays include economic impacts, planning and construction issues, or changing needs. Of nearly 900 projects that were under construction or in planning for the next 10 years, at least 390 projects have been delayed from their originally expected in-service dates.

Interregional Transfer Capability Study (Canadian Analysis)

In the 2024 LTRA, NERC provided a summary of the ITCS, a comprehensive study of existing and future interregional transfer capability undertaken by NERC in response to the Fiscal Responsibility Act of 2023. In addressing this legislation, NERC identified additions to transfer capability³⁰ for U.S. transmission planning regions (TPR) that could support energy adequacy.³¹ NERC filed the completed study report with FERC on November 19, 2024.³² Due to the interconnected nature of the BPS, NERC extended the study beyond the congressional mandate to identify and make recommendations to transfer capabilities from the United States to Canada and among Canadian provinces. The [ITCS Canadian Analysis](#) (Canadian Analysis) was published in April 2025.

The Canadian Analysis was the first-of-its-kind assessment of transfer capability and hourly energy margin analysis in Canada under a common set of assumptions but did not represent a transmission plan or blueprint. Transmission assessments, like the Canadian Analysis, are crucial to understanding potential options to mitigate future risks; however, alternative approaches other than transmission, such as local generation or demand-side solutions, can also mitigate future energy risks. The study results should be considered as an input into subsequent planning discussions that will consider broader objectives and the cost effectiveness of different alternatives to meet long-term needs.

Transfer Capability Analysis

The current transfer capability analysis between each pair of neighboring TPRs focused on 2024 Summer and 2024/25 Winter cases, with results shown in [Figure 25](#) and [Figure 26](#), respectively. These transfer capabilities represent the ability of the entire network to move energy from one TPR to another TPR³³ but are not synonymous with path ratings, which calculate the maximum flow that can be reliably attained over a selected set of transmission facilities.

³⁰ Transfer capability is the measure of the ability of interconnected electric systems to reliably move or transfer electric power from one area to another area by way of all transmission lines (or paths) between those areas under specific system conditions.

³¹ As evidenced during recent operational events including Western Interconnection Heatwave (2020), Winter Storm Uri (2021) and Winter Storm Elliott (2022), more needs to be done to support energy adequacy to be able to continuously meet

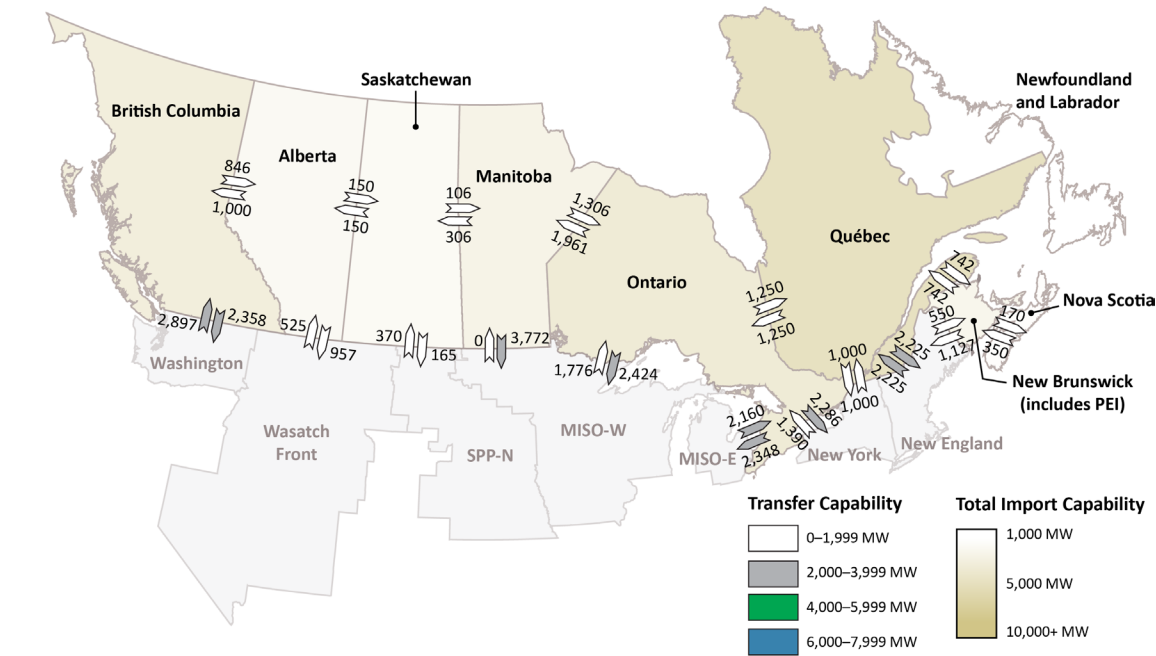


Figure 25: Transfer Capabilities (Summer)

customer demand. This is the reliability risk that the ITCS seeks to identify and mitigate through additions to transfer capability.

³² NERC [filing](#) of the *Interregional Transfer Capability Study*, FERC Docket AD25-4-000.

³³ Transfer capability is not synonymous with path ratings, which calculate the maximum flow that can be reliably attained over a selected set of transmission facilities. Since this study did not follow a path-based calculation method used by many TPRs, results generally do not match individual facility ratings.

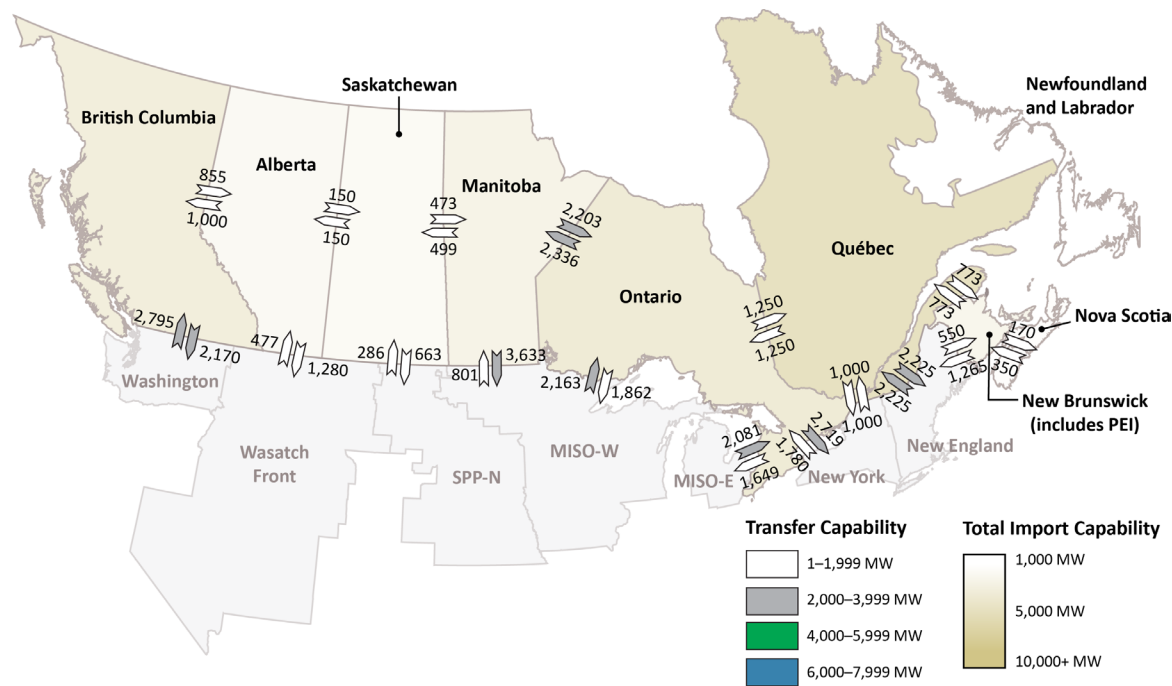


Figure 26: Transfer Capabilities (Winter)

The transfer capability results reflect the conditions studied and are not an exhaustive evaluation of the potential for energy transfers. The results are highly dependent on the assumptions, including load levels and dispatch of resources, which can vary significantly between seasons.

³⁴ This study did not incorporate climate change models.

Key Findings–Transfer Analysis

- Transfer capability varies seasonally and under different system conditions that limit transmission loading; it cannot be represented by a single number.
- Transfer capability is highly dependent on coordinated phase angle regulator settings, particularly in Saskatchewan, Manitoba, and Ontario.
- Prince Edward Island load impacts the transfer capability from New Brunswick to Nova Scotia.
- Transfer capability differs across Canada, with total import capability varying between 5% and 80% of peak load.
- Observed transfer capabilities are generally higher between Canada and the United States but relatively lower between provinces.
- The magnitude of transfer capability is not itself a measure of energy adequacy.
- Interregional transfer capability, as studied in this analysis, is not synonymous with path ratings.

Transfer Capability Additions

The Canadian Analysis also evaluated the future energy adequacy of the BPS if historical extreme weather conditions occurred again.³⁴ Specifically, the study applied 12 past weather years to the 2033 load and resource mix projection reported in the 2023 LTRA using the current transfer capabilities.³⁵ The study then evaluated the impact of additional transfer capability in mitigating the identified resource deficiencies during extreme events, thereby helping to improve energy adequacy. While there are several factors that Transmission Planners consider (including reliability, economics, and policy objectives) given NERC’s role, the Canadian Analysis focused solely on reliability, specifically in terms of energy adequacy and reserve optimization.

³⁵ The transfer capability analysis calculated current transfer capabilities for summer and winter based on 2024/25 projected system conditions using the area interchange method. Identified additions to transfer capability do not account for any changes to the transmission network that are planned after Winter 2024/25.

Key Findings—Energy Margin Analysis (2033)

- Canadian systems, like U.S. systems, were found to be increasingly vulnerable during extreme weather due to anticipated load increases and the changing resource mix. Transmission limitations, and potential for energy inadequacy, were identified in all 12 weather years studied. Enhancing transmission interfaces could reduce the likelihood of energy deficits during extreme conditions.
- Reliability risks are highly dependent on regional weather conditions. The import capability that could be beneficial during extreme conditions varied significantly across the country. An additional 12–14 GW of transfer capability may be an effective vehicle to strengthen energy adequacy under extreme conditions.
- More recent industry forecasts reflected in 2024 LTRA data generally result in considerable improvement, particularly in Ontario and Québec, as resource projections catch up to demand forecasts. Ongoing studies will capture future changes.
- Weather-related outages were not found to be a major contributor to deficiency events, as Canadian systems are generally designed to handle extreme cold conditions. However, high winter peak loads can still challenge the available energy supply.
- Some identified transmission additions could be addressed by projects already in the planning, permitting, or construction phases. Likewise, existing system capability to switch resources or load between provinces, which was not accounted for in this study, may help reduce the identified shortfalls.
- The importance of maintaining sufficient generating resources underpins the study’s assumptions. Higher-than-expected retirements (without replacement capacity) would lead to increased energy deficiencies and potentially more transfer capability additions if surplus energy is available from neighbors.
- A broad set of solutions should be considered, including transmission, local resource, demand-side, and storage solutions. A diverse and flexible approach allows tailored solutions specific to each province’s vulnerabilities, risk tolerance, economics, and policies.

Just as in the U.S. ITCS, the Canadian Analysis found potential for energy deficiency in all 12 weather years evaluated. The results identified the potential for energy deficiency in six provinces, with a maximum resource deficiency of 10 GW in Québec based on 2023 LTRA data. A sensitivity study using more recent forecasts, based on 2024 LTRA data, generally resulted in considerable improvement, particularly in Ontario and Québec, as resource projections catch up to demand forecasts.

The Canadian Analysis used these results to develop a list of additions to transfer capability from neighboring TPRs, including geographic neighbors without existing electrical connections. The analysis identified 14 GW of additional transfer capability that would improve energy adequacy under the studied extreme conditions throughout Canada. In the U.S. analysis reported last year, 35 GW of additional transfer capability was recommended across the U.S. to improve energy adequacy under extreme conditions. [Figure 27](#) shows the existing and potential new interfaces for Canadian TPRs where beneficial additional transfer capability is identified.

Transfer capability additions are based on 2033 resource mix and other study assumptions

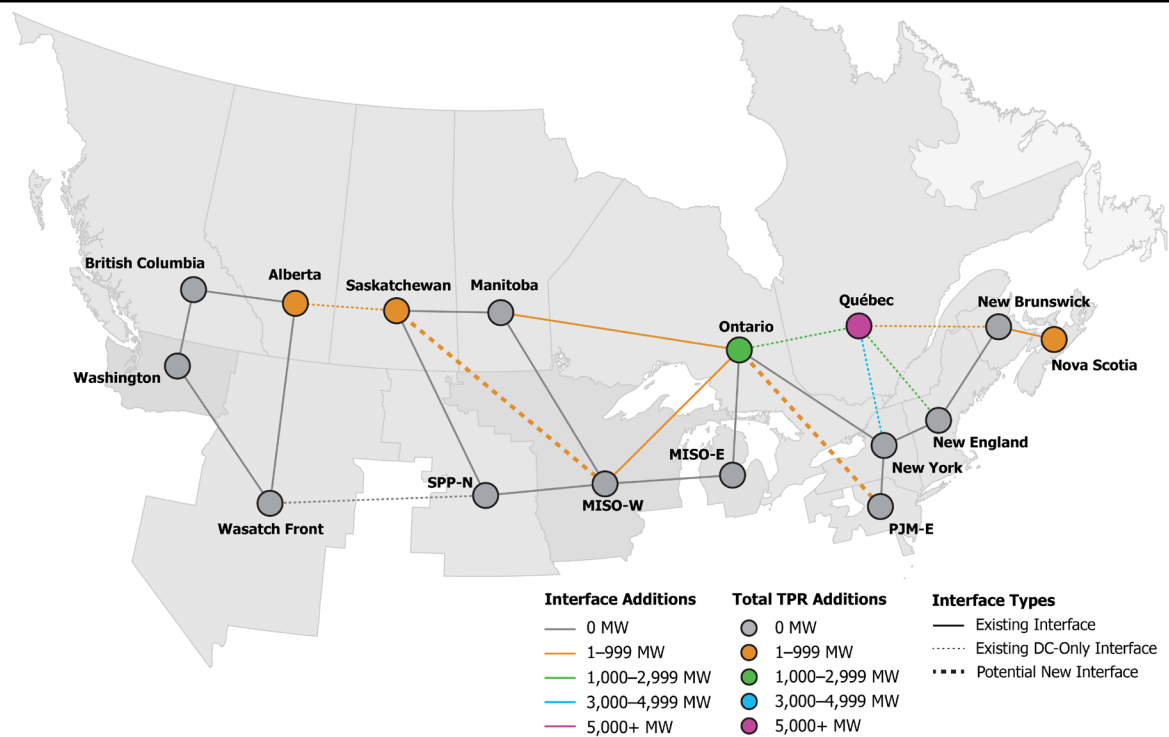
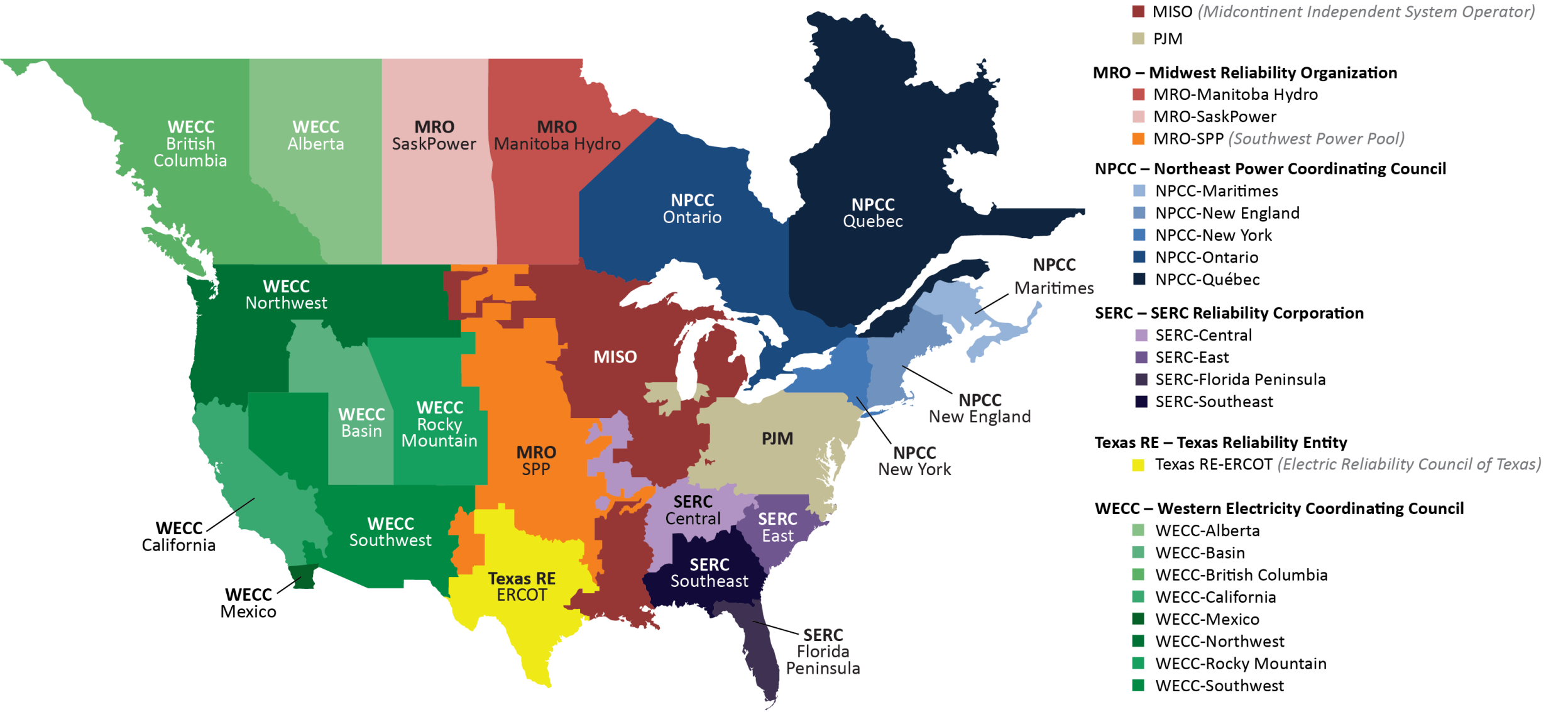


Figure 27: Transfer Capability Additions

Regional Assessments Dashboards

The following regional assessments were developed based on data and narrative information collected by NERC from the Regional Entities on an assessment area basis. The Reliability Assessment Subcommittee, at the direction of NERC’s RSTC, supported the development of this assessment through a comprehensive and transparent peer review process that leveraged the knowledge and experience of system planners, Reliability Assessment Subcommittee members, NERC staff, and other subject matter experts. This peer review process promotes the accuracy and completeness of all data and information.



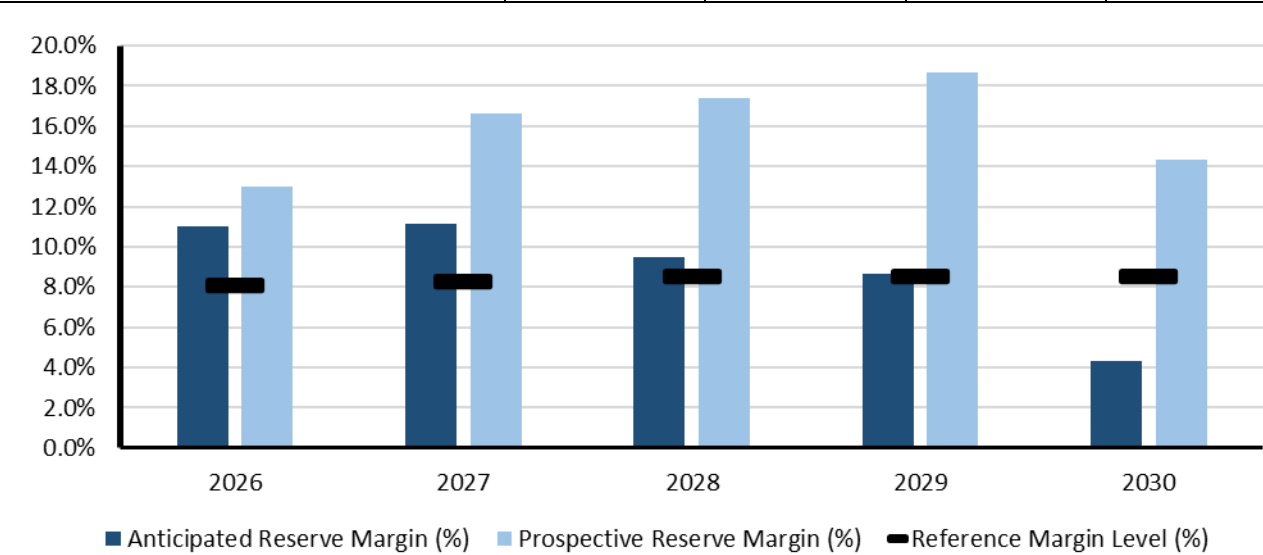


MISO

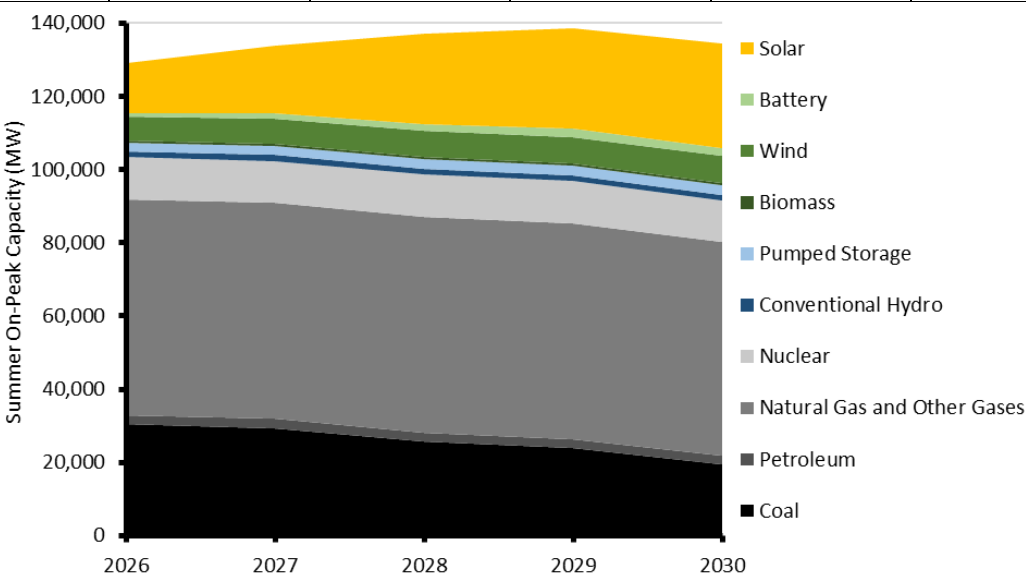
The Midcontinent Independent System Operator, Inc. ([MISO](#)) is an independent, not-for-profit organization responsible for operating the bulk electric power system and administering wholesale electricity markets across 15 U.S. states and the Canadian province of Manitoba. MISO ensures the reliable delivery of electricity to approximately 45 million people by managing regional transmission operations and energy and ancillary services markets and advising on long-term resource planning. The MISO footprint includes 39 local BAs and more than 550 market participants. MISO operates one of the world’s largest organized electricity markets, with its members operating a system that consists of over 79,000 miles of transmission lines and approximately 1,979 generating units. The peak electricity demand on the MISO system currently occurs during the summer season. MISO’s footprint lies across three regional entities (MRO, RF, and SERC), but MRO is responsible for coordinating data and information submitted for NERC’s reliability assessments.

Demand, Resources, and Reserve Margins (Summer)

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	127,071	131,107	135,998	138,286	139,631	140,959	142,003	142,789	143,754	143,754
Demand Response	8,280	8,280	8,280	8,280	8,280	8,280	8,280	8,280	8,280	8,280
Net Internal Demand	118,791	122,827	127,718	130,006	131,351	132,679	133,723	134,509	135,474	135,474
Additions: Tier 1	5,576	13,339	21,350	24,631	26,027	26,320	26,366	26,366	26,366	26,366
Additions: Tier 2	2,403	6,723	10,072	13,056	13,116	13,260	13,364	13,466	13,466	13,466
Additions: Tier 3	1,632	4,459	9,395	14,474	19,823	23,820	27,983	27,858	27,915	28,077
Net Firm Capacity Transfers	2,809	2,661	2,509	2,509	2,419	2,419	2,419	2,419	2,419	2,419
Existing-Certain and Net Firm Transfers	126,263	123,205	118,481	116,593	110,996	108,686	106,448	106,568	106,553	106,553
Anticipated Reserve Margin (%)	11.0%	11.2%	9.5%	8.6%	4.3%	1.8%	-0.7%	-1.2%	-1.9%	-1.9%
Prospective Reserve Margin (%)	13.0%	16.6%	17.4%	18.7%	14.3%	11.7%	9.3%	8.8%	8.1%	8.1%
Reference Margin Level (%)	8.1%	8.3%	8.5%	8.5%	8.5%	8.6%	8.7%	8.8%	8.9%	8.9%



Planning Reserve Margins



Existing and Tier 1 Resources

MISO Highlights

- For Summer 2026, MISO projects a prospective resource surplus ranging from 3.4 to 5.8 GW, but, if historical rates of resource additions continue, a deficit of resources beginning in Summer 2030 may be realized. The recently approved ERAS is expected to result in a considerable amount of new resource additions to the MISO system by 2029, which was not included in this year’s assessment due to the timing of FERC approval. As of December 2025, around 30 GW of new capacity is being studied through the ERAS process.
- MISO forecasts that the coincident total internal demand will peak at 127.1 GW during the 2026 Summer season and will grow to 143.7 GW by 2035. The largest contributor to this demand growth is data center additions.
- MISO’s accredited thermal capacity has decreased by 8.8 GW, primarily driven by reductions in accredited capacity of existing resources, and accredited non-thermal capacity has increased by 5.7 GW since last year, primarily driven by solar additions.
- In July 2025, MISO had more than 54 GW nameplate capacity of generation—predominantly solar and battery—with signed generation interconnection agreements that were projected to come on-line over the next few years. As of December 2025, that figure increased to more than 70 GW of nameplate capacity.
- Currently, MISO has surplus transfer capacity within its subregions, but transfers between subregions have been historically constrained by a transmission limitation between the two subregions. MISO members plan to invest \$30 billion to install nearly 5,000 miles of 345 kV and 1,750 miles of 765 kV transmission lines to address local, regional, and interregional transmission needs.

MISO Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	30,442	29,376	25,620	23,780	19,384
Petroleum	2,551	2,551	2,551	2,551	2,428
Natural Gas	58,748	58,892	58,984	59,099	58,262
Biomass	585	580	516	515	512
Solar	13,586	18,496	24,792	27,499	28,629
Wind	6,576	6,757	7,139	7,258	7,379
Conventional Hydro	1,521	1,523	1,524	1,524	1,524
Pumped Storage	2,608	2,608	2,608	2,608	2,608
Nuclear	11,571	11,571	11,571	11,571	11,571
Other	68	68	68	68	63
Battery	774	1,462	1,950	2,243	2,243
Total MW	129,031	133,883	137,322	138,715	134,604

MISO Assessment

MISO’s guiding principles for its planning process include six key objectives: reliability and resilience; economic efficiency/lowest total electric system cost; support of federal, state, and local energy policy and member goals for their respective resource mixes; appropriate cost allocation for transfer-enabling assets; analysis of an appropriate range of system scenarios and dissemination of results to relevant decisionmakers; and coordinated planning processes among neighbors to eliminate barriers to reliable and efficient operations. See MISO’s [Statement of Guiding Principles](#) for more information.

Planning Reserve Margins

Every year, MISO coordinates with its stakeholders to calculate the minimum amount of capacity above coincident peak demand required such that the LOLE equals one-day-in-10 years, or 0.1 days per year. For the MISO-wide analysis, generating units were modeled as part of their appropriate local resource zone as a subset of a larger MISO system. The MISO system was modeled with no internal transmission limitations between zones. To meet the LOLE reliability criteria, capacity is either added or removed from the MISO system within the model. The minimum amount of capacity above the MISO system coincident peak demand forecast required to meet the LOLE reliability criteria was used to establish seasonal Planning Reserve Margin (PRM) values. This minimum PRM is based on a probabilistic analysis and is expressed for each season as an unforced capacity (UCAP) requirement based on the modeled availability of resources in the MISO system. UCAP represents an adjustment from installed capacity (ICAP) that accounts for a generator’s equivalent forced outage rate demand, a measure of the probability that a generating unit will not be available due to forced outages, which MISO further adjusts to exclude events outside management control.

MISO’s [LOLE Study for PY 2025–2026](#) estimated the minimum seasonal PRM values (in UCAP) as follows:

- Summer 2026: 8.1%
- Fall 2026: 14.9%
- Winter 2026-2027: 19.1%
- Spring 2027: 26.2%

The study that produced these PRM values included a probabilistic risk modeling and power flow transfer analysis to also determine zonal local reliability requirements (LRR), zonal import ability (ZIA), zonal export ability (ZEA), capacity import limits (CIL), and capacity export limits (CEL). A software program called Strategic Energy & Risk Valuation Model (SERVM) was used to calculate LOLE for the applicable planning year.

The results of the LOLE Study for PY2 5-26 serve as inputs to the MISO Planning Resource Auction (PRA). The computed PRMs are used in area adequacy assessments unless an area includes an entity that falls under a state regulatory body’s purview, in which case a state-mandated PRM may be used in MISO’s analysis in place of the computed PRM.

In most of the MISO footprint, LSEs with oversight by the applicable state or local regulators are responsible for resource adequacy. Every year, MISO collaborates with the Organization of MISO States (OMS) to survey its members about their plans to maintain resource adequacy in the coming years. The OMS-MISO survey provides a resource adequacy view for the MISO region over a five-year horizon based on the latest information available at the time of survey. The [2025 OMS-MISO Survey](#) indicated that LSEs are expected to have adequate resources to meet load reserve requirements; however, various projected capacity scenarios and large spot-load additions highlight the increasing uncertainty and evolving risk.

For Summer 2026, MISO projects a prospective surplus ranging from 3.4 to 5.8 GW. Moving beyond the short term, if historical rates of resource additions continue in MISO as reflected in the anticipated resources projection for the NERC LTRA, a deficit of resources beginning in summer 2030 may be realized. This potential shortage is due to accelerated load growth and inadequate build rates for new resources. Interconnection of additional identified resources in Tier 2 and potential resources in Tier 3 could present an opportunity to retain a resource surplus through the entirety of the LTRA study time frame.

In anticipation of resource shortages beginning in Summer 2030, MISO has initiated the following processes and reforms:

1. Implement the interim [ERAS](#) process to facilitate the accelerated rollout of new resources to meet increased demand growth. This process has yielded nearly 30 GW of potential new capacity as of December 2025.
2. Move to a direct loss of load (DLOL) marginal accreditation model for the 2028–2029 planning year, which is intended to better reflect the true value of the next megawatt of resources during critical hours
3. Enhance resource adequacy risk assessment and communication like aligning solar representations between the PRA and LOLE model, properly represent non-firm imports between neighboring regions, and investigate the relationship between solar and battery installations and how their capacity might impact one another.
4. Reduce queue cycle times through automation

- 5. Establish a more robust DR and emergency resource process moving forward to ensure non-market units are being appropriately accredited.
- 6. Enhance allocation of resource adequacy requirements.

Energy Risk

MISO uses a seasonal PRA and conducts seasonal resource assessments to evaluate generation availability, outage rates, and forecasted load. Based on outcomes of these processes, MISO has also initiated a change to its capacity market construct, in part, to ensure energy adequacy by evaluating how classes of resources and each individual resource help serve load during periods of the year that demonstrate the most reliability risk to the MISO system.

Beyond the probabilistic energy risk assessments associated with MISO’s LOLE Study for PY 25–26, MISO has also performed additional assessments for [renewable integration](#) and [regional resource evolution](#) that touch on the topic of energy risk but are not a formal part of MISO’s resource adequacy and resource planning processes.

ProbA Results

The results of the ProbA simulations show normal risk for the MISO system in study year 2027 and more pronounced, elevated risk in study year 2029 wherein MISO assumed approximately 14 GW of potential retirements that are uncertain to occur by 2029. The results offer a point-in-time snapshot of risk based on the data available during the time of this year’s analysis. The regulatory structure within MISO provides utilities and regulators with many tools to ensure alignment of large-load additions, generator retirements, and generator additions. Regulators and utilities in the MISO region are statutorily required to ensure reliability and have the ability to address uncertainties associated with these three variables.

MISO initiatives like ERAS and joint collaborative efforts between MISO, its membership, regulators, and neighboring regions will be critical to ensuring resource adequacy in the coming years.

While overall installed nameplate capacity across the system is expected to increase in the coming years, system risk can be expected as the aging thermal fleet in MISO’s system continues to retire and is replaced with more intermittent, less available generation. Significant demand growth, in part due to large data center loads, has been forecasted by MISO’s LSEs. It is important to note that a substantial number of large-load customers continue to evaluate their options for participation in the markets, including the potential to participate as DR resources during emergency conditions. The construction delays for new resources due to supply chain and other issues, as well as the ongoing evaluation of large-load customers, contribute to continued uncertainty regarding both overall resource availability and the prospective participation of large loads as DR resources in the

markets. This substantiates that MISO, its membership, and regulators must continue to monitor retirements and large-load additions and increase resource additions to ensure future resource adequacy.

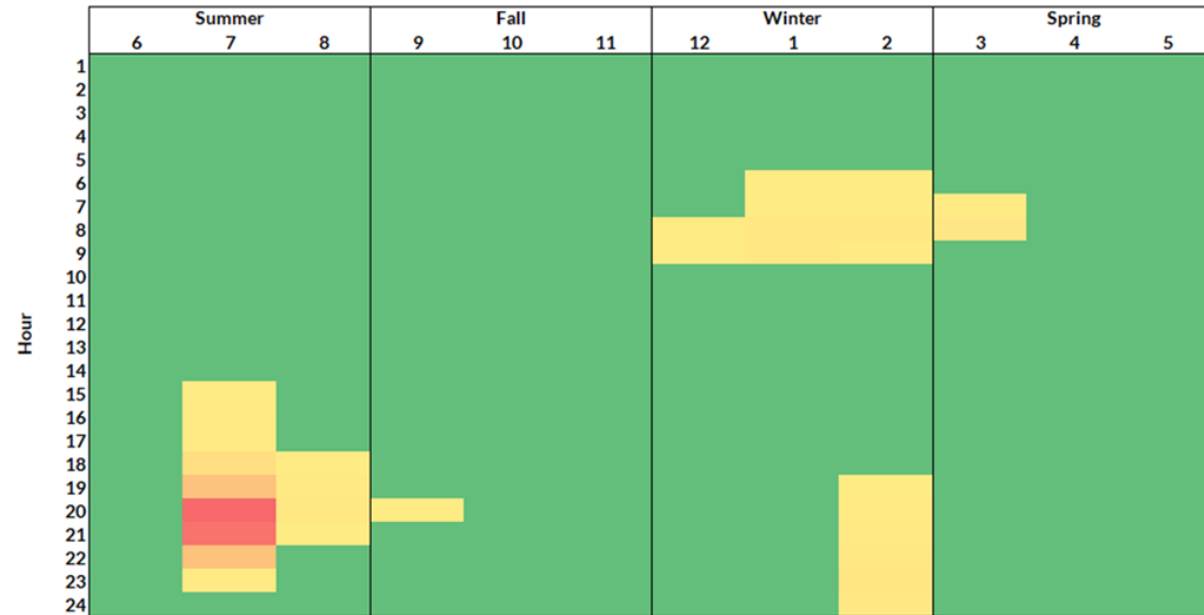
The ProbA simulations for study year 2029 resulted LOLE of 2.4 days in 1 year compared to the target of 0.1 day in 1 year. The primary drivers for the expected risks in 2029 include the following:

- Load growth increases: Peak demand for winter is expected to grow considerably—approximately 9–10 GW in 2029.
- Nameplate capacity changes: To align with MISO’s annual LOLE studies and proactively send the right signals, member-submitted low certainty resources from the most recent OMS-MISO Survey were assumed to be unavailable in study year and amounted to approximately 14 GW of additional unconfirmed retirements by Winter 2029.
- Summer risk shifts to later in the day: An increased reliance on solar generation as the resource mix evolves results in summer risk appearing as solar generation ramps down.
- In Winter 2029, risk is emerging in morning and twilight hours: Shifting winter risk is driven by a combination of increased reliance on solar generation, an increase in member-submitted load forecasts, elevated thermal forced outages induced by extreme cold temperatures, and a larger generation deficit than in prior years.

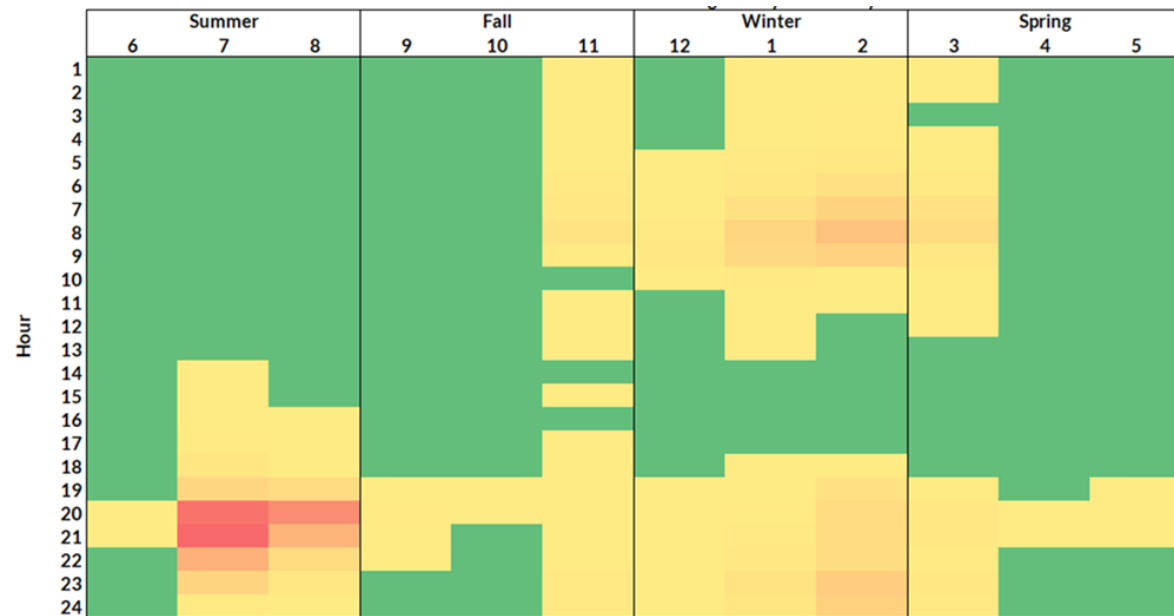
Base-Case Summary of Results			
	2026*	2027	2029**
EUE (MWh)	0	797	31,654
NEUE (ppm)	0	1.13	42.4
LOLH (hours per Year)	0	0.23	6.61

*Provides the 2024 ProbA Results for Comparison
**The 2029 ProbA study assumed approximately 14 GW of potential retirements that are uncertain to occur by 2029. The results offer a point-in-time snapshot of risk based on the data available during the time of this year’s analysis.

The following EUE heat maps show the distribution of unserved energy events from the probA simulations across hours and seasons. Green cells indicate no unserved energy events, while yellow and red cells indicate increasing numbers of simulations with unserved energy.



2027-2028 ProbA Heat Map



2029-2030 ProbA Heat Map

Demand

LSEs within MISO’s footprint report two sets of seasonal peak demand projections, coincident with the entire MISO system and coincident with their applicable local resource zone. LSEs also submit their non-coincident peak demand projections for the next 10 years, monthly for the first two years and seasonally for the remaining eight years. Coincident peak demand forecasts are based on factors including average historical weather conditions, economic conditions, and expected demand changes. For the 2025 LTRA, MISO used its LSE demand submissions to create non-coincident and coincident peak demand projections on a regional basis by summing the annual peak demand forecasts for the individual LSEs in the larger region of study. In MISO’s normal process, the coincident peak demand forecast is used to determine each LSE’s PRM requirement.

MISO forecasts the coincident total internal demand to peak at 127,071 MW during the 2026 Summer season. Since the 2024 LTRA, MISO has increased its 10-year forecast peak demand from 132 GW to 143.7 GW. This rate of increase is expected to continue.

The largest increases in demand in the MISO footprint are related to data centers. These large load additions are projected to result in significant increases in the demand for energy in all hours and would not conform to typical residential or industrial load patterns. In total, MISO projects approximately 6 GW of data center load additions by 2027, accumulating to 14 GW by 2030, and 18 GW by 2035. MISO published [a Long-Term Load Forecast white paper](#) in December 2024. This white paper comes to similar conclusions around the load growth rate based upon member submissions by way of the MOD-031/FERC 714 data pathway.

Demand-Side Management

A combination of peak demand hour performance, forecasting, and baseline scenarios help MISO to determine the amount of DR capacity available during peak demand hours. DR programs continue to play a significant role in providing capacity for MISO. For the 2025/26 planning year, DR is steady around 9 GW in the summer and 8 GW in the winter and is projected to remain constant during the LTRA study horizon. MISO’s latest reforms for demand-side resources focus on accrediting such resources based on their availability and performance during the highest-risk hours (in and near emergency conditions).

Distributed Energy Resources

Behind-the-meter-generation (BTMG) resources contribute about 4.4 GW of capacity across the study horizon, of which approximately 1.3 GW are distributed photovoltaics. MISO’s transition to seasonal auctions highlights the variability of DERs across the four seasons, and it is working with stakeholders to derive adequate methods of aggregating, reporting and allowing DER participation in MISO markets.

Generation

Because of the size of MISO’s interconnection queue, in the 2025 NERC LTRA, generation in the queue is multiplied by a reduction factor based on the study phase and likelihood of that resource coming on-line and the timing of those additions. MISO notes that the recent [2025 OMS-MISO survey](#) used a slightly different resource addition cadence than what is reported for the LTRA that factors in both planned utility/member-specific generation addition rates and historical addition cadences. Specifically, the LTRA’s existing resource capacities come directly from the 2025–2026 MISO Planning Resource Auction (PRA), based on the amount of confirmed seasonal accredited capacity. Tier 1 resources describe the expected integration rate of currently signed generator interconnection agreements (GIA) over a three-year delay ramp to represent the fact that many GIAs experience delays on their path to installation in MISO. Tier 2 resources are based on active replacement projects and Phase 3 GIAs. Tier 3 resources are based on a 15% completion rate of all non-signed GIAs with the three-year delay schedule in line with Tier 1 resources.

As of December 2025, MISO had more than 70 GW nameplate capacity of generation—predominantly solar and battery—with signed generation interconnection agreements that are projected to come on-line over the next few years. Since the 2024 NERC LTRA, MISO has observed an 8.8 GW reduction in thermal accredited capacity, driven primarily by aging existing facilities, unit suspensions, and retirements. However, suspensions and retirements in MISO have recently been followed by replacement facilities that re-utilize the interconnection service with new units. More than 75% of the units pursuing cessation in MISO are also pursuing replacement projects. Non-thermal accreditation has increased by 5.7 GW since the 2024 NERC LTRA report.

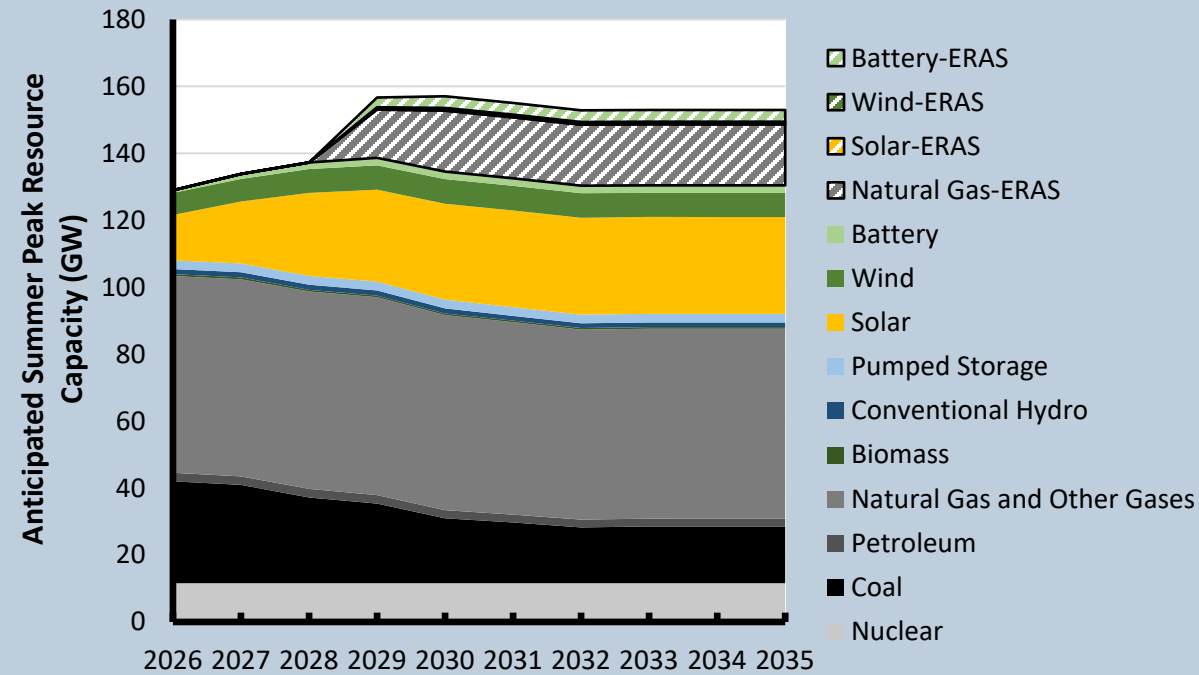
MISO’s accreditation of battery resources is tied to the mandatory 4-hour energy offer window, resulting in most storage resources pursuing the ratio of 1 MW/h for 4 hours. Battery storage resources receive a 95% class-wide accreditation (relative to nameplate capacity) in the MISO PRA and NERC LTRA for their first year in operation in lieu of historical output data. Wind ELCC analyses have been performed for all seasons. Wind capacity is given the following seasonal accreditations: Summer: 20.8%; Fall: 30.7%; Winter: 29.0%; Spring: 25.3%. The effective capacity for existing solar resources is based on historical performance during typical seasonal peak hours. New solar resources get 50% accreditation relative to nameplate capacity in the summer, fall, and spring seasons and 5% in the winter season. Hydro resources accredited capacity is calculated based on historical performance during seasonal peak hours.

Energy Storage

MISO is experiencing increased interest by members for battery energy storage, with more than 500 MW currently on-line, and queue projects identifying more than 100 GW of battery or hybrid fuel type projects. MISO’s anticipated installations include an addition of more than 2.4 GW by Summer 2030

and a prospective battery fleet of nearly 7 GW by 2035. The primary expected usage for batteries is for reliability, providing significant capacity capability with the variable nature of MISO’s growing solar and wind fleet. MISO performs risk modeling with advanced storage representations to ensure that battery capacity is characterized appropriately.

The timing of FERC’s approval of MISO’s ERAS process in July meant that the generator additions that MISO plans as part of that process were not included in the resource adequacy modeling for the 2025 LTRA. ERAS is already expected to result in considerable new resource additions to the MISO system in the near term. The additional summer on-peak capacity from the ERAS program is expected to grow to over 20 GW by Summer 2030. These expedited resource additions are expected to reduce the shortfall risk identified in this year’s ProbA. Furthermore, the timing of the ERAS additions would mitigate an identified winter ARM shortfall if the approximately 8.6 GW of winter on-peak capacity anticipated by 2028–29 reaches operation as projected. The latest ERAS projects, along with current load forecasts and resource projections as of July 2026, will be included in the input data for the 2026 LTRA and ERAS summer capacity additions are summarized by the diagonal hatched stacked areas in plot below.



The Potential Effect of MISO’s ERAS Process on Anticipated Summer Capacity

Energy Transfers

In the PRA, MISO accredits several power purchase agreements known as diversity contracts between Manitoba Hydro and MISO internal generation owners, wherein energy flows from Manitoba to the MISO system in the summer when Manitoba has excess hydro power vice-versa in the winter. Currently, MISO has surplus capacity in both the MISO North/Central and MISO South subregions, but imports and exports between them have been historically constrained by a transmission limitation.

A key input to MISO’s probabilistic risk modeling that determines the system-wide seasonal PRM values is how much non-firm energy support MISO can reasonably expect from neighboring external areas. Every year, MISO performs an analysis of recent year trends in seasonal non-firm energy support to develop a range for each season that the probabilistic model will randomly draw from mid-simulation. Additionally, MISO found this year that there was not a significant difference in the amount of non-firm energy support MISO received from its neighbors during hours and days with tight operating margins when compared to normal operating conditions.

Transmission

MISO, in collaboration with its transmission-owning members and stakeholders, performs annual reliability assessments to identify transmission infrastructure upgrades needed to ensure system reliability. Many factors are considered during MISO’s transmission expansion planning process, including urgency of need, suitability of alternatives to address identified issues, cost effectiveness, performance of alternatives, development time frame, right-of-way or substation impacts, expandability, and operational flexibility. To learn more about MISO’s transmission expansion plan, see information and reports posted on MISO’s [MTEP](#) page.

MISO has 488 transmission projects totaling \$30 billion planned across [MTEP24](#), its [Long Range Transmission Planning \(LRTP\)](#) Tranche 2.1, and the [SPP-MISO Joint Targeted Interconnection Queue \(JTIQ\)](#). In total, these three programs include nearly 5,000 miles of 345 kV and 1,750 miles of 765 kV

transmission lines in their project portfolios. These projects aim to address local, regional, and interregional needs across the area’s large geographic footprint by enabling reliability in response to accelerating load growth. In fact, most of the demand increases reported by LSEs in the MISO footprint can be tracked to transmission projects either in the Expedited Project Review (EPR) or normal MTEP project pathway. Specifically, MISO’s Tranche 2.1 Portfolio seeks to establish a transmission system backbone for the whole MISO system, and the JTIQ portfolio is being undertaken with the potential to unlock approximately 28 GW of generator interconnections, eliminating barriers to new capacity at the SPP-MISO seam.

As of December 1, 2025, MISO identified 63 projects comprising 12.8 GW of additional load through the EPR process.

Reliability Issues

Load growth and additions are increasing. A spike in large, single-site load additions from manufacturing resurgence and incremental load growth from electric vehicles and other electrification trends pose new challenges for the grid. Continued high numbers of MTEP projects submitted through the expedited project review request, which are urgent projects that cannot wait for the next full MTEP cycle to proceed, are evidence of this faster paced load growth and additions.

Maintaining resource capacity margins will require accelerated resource additions to outpace retirements and the forecasted load growth. Recent reforms have helped to reduce the volume of requests and to process them more efficiently. As of December 1st, 2025, MISO has 1,127 Active interconnection queue projects that total 215 GW of nameplate capacity. This is in addition to the 444 projects and 70 GW of signed GIAs.

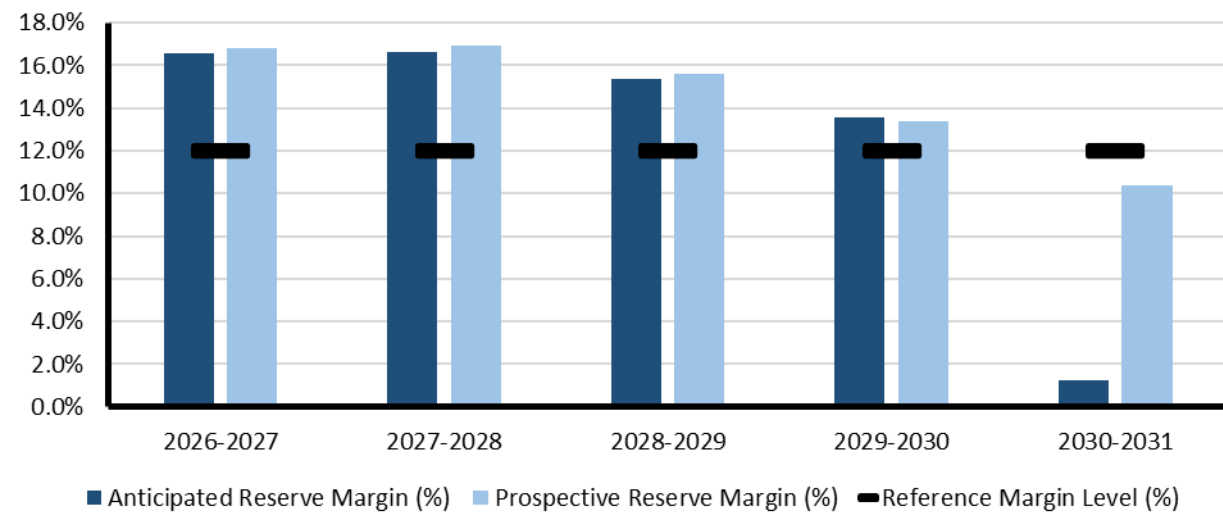


MRO-Manitoba Hydro

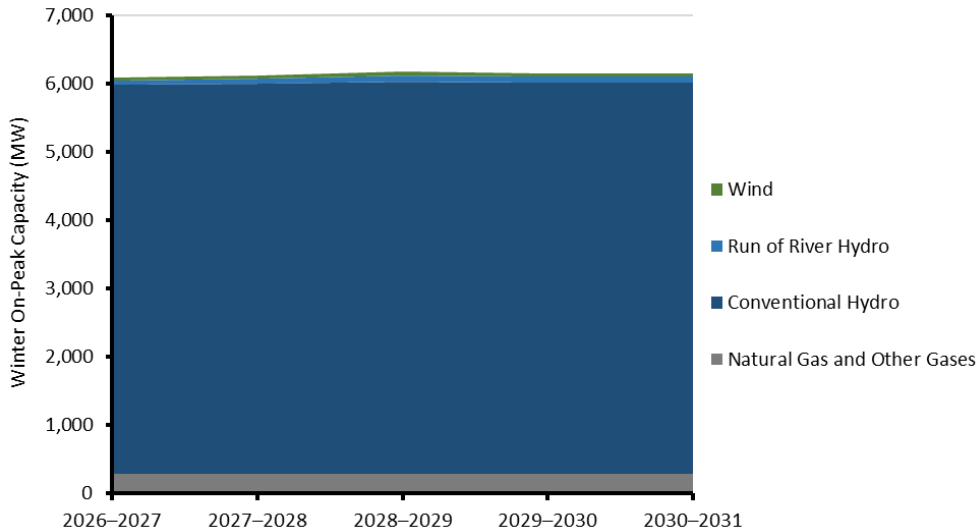
Manitoba Hydro is a provincial Crown corporation and one of the largest integrated electricity and natural gas distribution utilities in Canada. Manitoba Hydro provides electricity to approximately 601,000 electric customers in Manitoba and provides approximately 291,000 customers with natural gas in Southern Manitoba. The service area is the province of Manitoba, which is 251,000 square miles. Manitoba Hydro is a provincial crown corporation and one of the largest integrated electricity and natural gas distribution utilities in Canada. Manitoba Hydro is winter-peaking. Manitoba Hydro is its own PC and BA. Manitoba Hydro is a coordinating member of MISO. MISO is the Reliability Coordinator for Manitoba Hydro.

Demand, Resources, and Reserve Margins

Quantity	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2031–2032	2032–2033	2033–2034	2034–2035	2035–2036
Total Internal Demand	5,002	5,041	5,081	5,137	5,374	5,412	5,447	5,507	5,580	5,655
Demand Response	0	0	0	0	0	0	0	0	0	0
Net Internal Demand	5,002	5,041	5,081	5,137	5,374	5,412	5,447	5,507	5,580	5,655
Additions: Tier 1	36	50	63	63	63	63	63	63	63	63
Additions: Tier 2	0	0	0	0	500	500	500	500	500	500
Additions: Tier 3	0	0	0	0	0	0	0	0	0	0
Net Firm Capacity Transfers	-113	-93	-167	-172	-565	-565	-565	-565	-565	-315
Existing-Certain and Net Firm Transfers	5,794	5,831	5,799	5,770	5,377	5,377	5,377	5,377	5,377	5,627
Anticipated Reserve Margin (%)	16.6%	16.7%	15.4%	13.6%	1.2%	0.5%	-0.1%	-1.2%	-2.5%	0.6%
Prospective Reserve Margin (%)	16.8%	16.9%	15.6%	13.4%	10.4%	9.6%	8.9%	7.7%	6.3%	9.3%
Reference Margin Level (%)	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%



Planning Reserve Margins



Existing and Tier 1 Resources

MRO-Manitoba Hydro Highlights

- Manitoba projects a shortfall in anticipated resources starting in the winter of 2030–2031.
- The demand is projected to grow over 13% through the assessment period.
- The Province of Manitoba paused cryptocurrency interconnection requests until April 2026 to prepare a long-term solution to limit reliability impacts to the system.³⁶

MRO-Manitoba Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031
Natural Gas	278	278	278	278	278
Wind	52	52	52	52	52
Conventional Hydro	5,705	5,723	5,758	5,735	5,735
Run of River Hydro	59	71	90	90	90
Total MW	6,094	6,124	6,179	6,155	6,155

³⁶ [Province directs Manitoba Hydro to continue pause on new cryptocurrency connections](#)

MRO-Manitoba Hydro Assessment

Planning Reserve Margins

The ARM for the summer season does not fall below the RML of 12% during the 10-year assessment period. The ARM for the winter season falls below the RML of 12% beginning in Winter 2030–2031 due to a combination load growth and reduced resources due to an ending of winter capacity import contracts (“diversity capacity”) in 2030, as well as an assumed reduction of the Curtailable Rate load management program.

Demand

Manitoba Hydro is anticipating load growth of 1.5% (net of demand side management) over the assessment period. In order to limit load growth, Manitoba Hydro has been directed by the Province of Manitoba to suspend processing of cryptocurrency load connections until 2026.

Demand-Side Management

Manitoba Hydro currently does not have any form of directly controllable and dispatchable DR programs. Manitoba Hydro does have an indirectly controllable and dispatchable DR program called the Curtailable Rate Program.

The Curtailable Rate Program provides approximately 160 MW of load reduction through up to 16 load curtailments of 4¼ hours each on five-minutes notice. The program is intended for peak load management. In addition, one product of the Curtailable Rate Program provides 50 MW of contingency reserves, also on five-minutes notice.

The terms and conditions of the Curtailable Rate Program were updated in August 2023 to require an annual curtailment test, increase the number of possible curtailments, extend the notice period for conversion to firm service, and make minor editorial changes.

Manitoba Hydro is in the process of developing a new industrial rate pilot, with the combined goal of reducing winter peak and providing additional rate options for customers that both assist customer profitability and help keep costs low for all Manitobans. The rate pilot is being developed to leverage existing technology and programming with the intent of introducing the program on a pilot basis.

Manitoba Hydro, in collaboration with Efficiency Manitoba, is looking to develop a DR pilot program aimed initially at targeting smart thermostats with the focus on reducing Manitoba’s winter peak. The pilot program is targeting to launch for the winter of 2025.

Energy Risk

As the operator of a predominantly hydro system, weekly at a minimum, Manitoba Hydro performs an all-hours season-ahead energy adequacy analysis as required to manage near-term to seasonal-ahead reservoir energy storage while meeting system demands. Additionally, Manitoba Hydro conducts specific analyses to determine short-term storage and minimum flow requirements that would be required to maintain Manitoba and extra-provincial resource adequacy obligations. As there are modest levels of wind and solar on the Manitoba Hydro system, the resource adequacy risk on the Manitoba Hydro system over the next five years and under normal water conditions is expected to fall at or very near the peak demand hours.

Probabilistic Assessment (ProbA)

Every year, Manitoba Hydro prepares a probabilistic assessment for the Manitoba system, most recently in 2024. The 2024 probabilistic assessment was supportive of a 12% PRM for the Manitoba system being sufficient to provide an LOLE of less than 0.1 days per year under the study assumptions. Results of the 2025 ProbA prepared for the LTRA are as follows.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	4	3	6
NEUE (ppm)	0.17	0.12	0.23
LOLH (hours per Year)	0.05	0.03	0.06
* Provides the 2024 ProbA Results for Comparison			

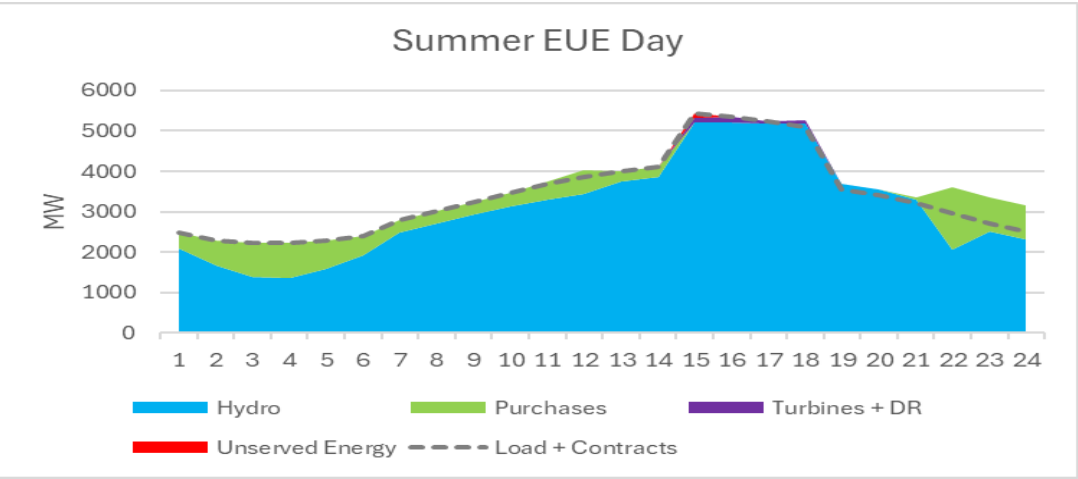
There were no appreciable Manitoba loss-of-load events seen in winter or in the summer for 37 of the 44 weather/ flow years studied. Manitoba loss-of-load events that were seen in summer occurred during the lowest flow years with upwards of 80% of the risk of loss of load occurring in the two worst flow years (1988 and 2003) of the 44 years studied. The Manitoba loss-of-load events that were seen in summer were driven by very low hydro flow conditions combined with both very high summer loads in Manitoba and very high summer loads on the MISO system.

The annual EUE heat map for 2029 is provided below.

2029 EUE Heat Map



A sample summer EUE day with very high loads on the Manitoba and MISO systems during extreme drought is shown in the illustration below. For much of the day, Manitoba is a net importer of power.



Distributed Energy Resources

There is a potential for significant solar DER resources in the latter half of the assessment period, and plans are being developed to study the impacts on the Manitoba Hydro system. The potential for future solar DERs may be dependent on solar PV subsidies and/or incentives.

Generation

Under normal water conditions, over 95% of the generation in Manitoba Hydro’s system is from renewable energy—primarily hydro generation and wind generation. A Tier 1 project to replace eight older and smaller hydro units is in progress for the Pointe du Bois Generating Station. The Pointe du Bois Renewable Energy Project (PREP), approximately 50 MW, replaces the original hydro units that were mothballed or retired based on economics/end of life after about 100 years of operation.

On February 25, 2025, Manitoba Hydro filed with its regulator the preliminary estimate for a 500 MW gas capacity resource entering service in 2030. While not yet approved, this proposed plant was included as Tier 2 capacity resource. Manitoba is not currently experiencing the large additions of wind and solar resources seen in other regions, and hence, emerging reliability issues arising from such large wind and solar resource additions are not anticipated over the next five years. Manitoba Hydro is working on an [Integrated Resource Plan](#) that will support future investment decisions. The Government of Canada is further regulating carbon dioxide emissions from the electric generation sector, finalizing the Clean Electricity Regulations in December 2024. These regulations begin to restrict fossil fuel generation in 2035 and direct Canadian electric generation to achieve net-zero greenhouse gas emissions by 2050. Manitoba Hydro does not anticipate that meeting the Clean Electricity will have a negative impact on system reliability or modify the operation of Manitoba’s electricity system. The Province of Manitoba provided energy policy direction with the publication of the Affordable Energy Plan in September 2024. Energy conservation, wind generation, and dispatchable back-up generation, such as natural gas combustion turbines, form the basis of the plan. Manitoba Hydro’s forthcoming 2025 Integrated Resource Plan will be consistent with the policy direction.

Energy Storage

Additions of battery energy storage system (BESS) resources in the next 10 years are not anticipated at this time. The hydro generation resources, while not storing electricity directly, do store water in a reservoir for conversion to electricity and have been in use for over 100 years. For most hours of the year, the only dispatchable resources on-line are hydro generation resources, which therefore serve most operational, reliability, and economic functions. In the longer term, there may be a role for energy storage resources in Manitoba in areas that may become transmission constrained. Preliminary long-term studies of a modest amount of energy storage resources have not identified

operational challenges and have not required modification to planning assumptions since the 2024 LTRA.

Energy Transfers

The Manitoba Hydro system is winter-peaking and is interconnected to the MISO Zone 1 Local Resource zone (which includes Minnesota and North Dakota), which as a whole is summer-peaking. Significant capacity transfer limitations from MISO into Manitoba may have the potential to cause reliability impacts, but only if the following conditions occur simultaneously: extreme Manitoba winter loads, unusually high forced generation/transmission outages, and a simultaneous emergency in the northern MISO footprint. In the unlikely event of such a situation, Manitoba Hydro would implement plans developed in accordance with emergency operating procedures for capacity and energy emergencies, including calling on emergency energy from Adjacent Balancing Authority Coordination Agreements, if available. Transmission planning studies consider maximum firm winter import and N-1 and N-2 contingencies. The completion of the Manitoba–Minnesota 500 kV transmission line on June 1, 2020, increased import capability from 700 MW to 1,400 MW and firm export capability from 2,100 MW to 2,983 MW. This new 500 kV line also improved the resilience of the network in the event of transmission contingencies. The 500 kV line is equipped with single pole trip and reclose capability, which results in only one phase being out for one second during common single-phase faults.

The expiration of existing winter capacity import contracts (“diversity capacity”) in 2030 is contributing to overall lower firm resources from winter 2030–2031 through the remainder of the assessment period.

Transmission

Manitoba Hydro has identified aging components of its HVdc system as a potential reliability issue, which is unique to the assessment area. The concern is that the oldest HVdc system components could be approaching end-of-life. Studies have been initiated to study/evaluate modernization options and alternatives. The studies and procurement of replacement equipment could take up to 10 years to implement based on the current HVdc market capability. There is currently spare capacity on the HVdc system, and the end-of-life failure of a single pole would not create reliability issues. The further end-of-life failure of a second pole, while believed to be a very low probability, has the potential to create reliability concerns under peak winter loads if mitigation measures are not implemented. Mitigation measures to minimize the likelihood of experiencing this quantity of long-term outages are being actively pursued.

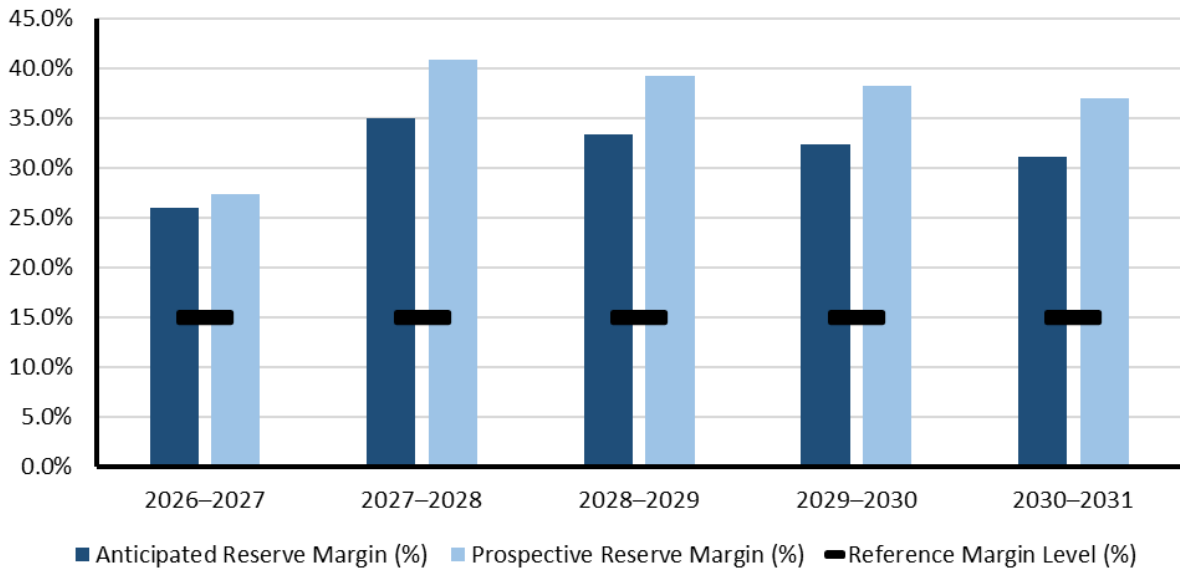


MRO-SaskPower

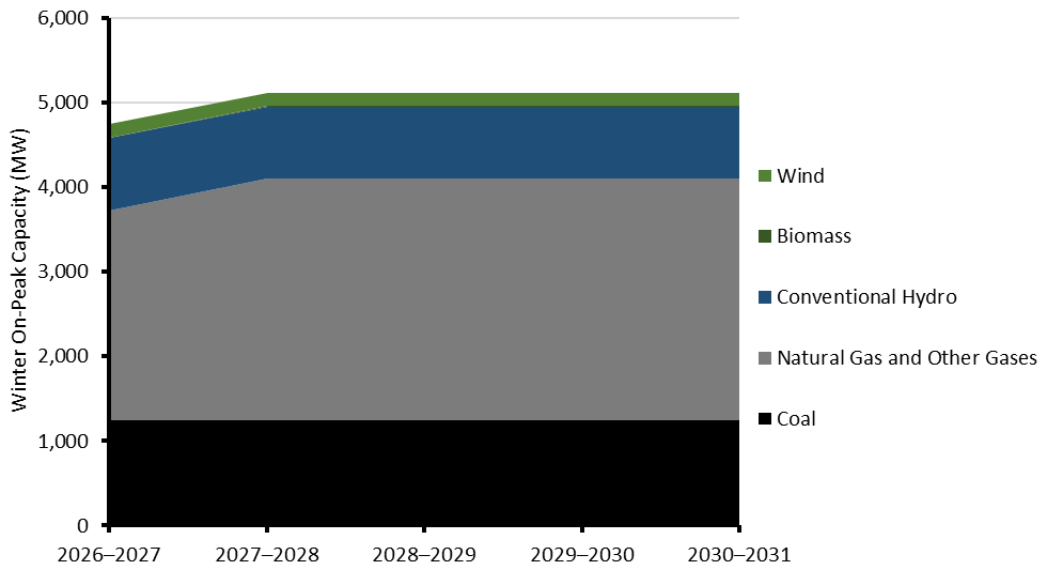
MRO-SaskPower is an assessment area that covers the Canadian province of Saskatchewan. The province has a geographic area of 651,900 square kilometers (251,700 square miles) and a population of just over 1.1 million people. The Saskatchewan Power Corporation (SaskPower) is the PC and Reliability Coordinator for the province of Saskatchewan and is the principal supplier of electricity in the province. SaskPower is a provincial Crown corporation and, under provincial legislation, is responsible for the reliability oversight of the Saskatchewan Bulk Electric System and its interconnections. Overall, SaskPower operates nearly 14,816 circuit-km of transmission lines, 65 high-voltage switching stations, and 191 distribution substations. Peak electricity demand on the SaskPower system currently occurs during the winter season.

Demand, Resources, and Reserve Margins

Quantity	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2031–2032	2032–2033	2033–2034	2034–2035	2035–2036
Total Internal Demand	4,040	4,112	4,148	4,180	4,205	4,230	4,278	4,314	4,347	4,375
Demand Response	72	72	72	72	72	72	72	72	72	72
Net Internal Demand	3,968	4,040	4,076	4,108	4,133	4,158	4,206	4,242	4,275	4,303
Additions: Tier 1	90	460	460	460	460	460	460	460	460	460
Additions: Tier 2	55	241	241	241	241	241	241	241	241	241
Additions: Tier 3	0	0	0	0	0	0	0	0	0	0
Net Firm Capacity Transfers	290	315	315	315	315	315	315	315	315	315
Existing-Certain and Net Firm Transfers	4,907	4,992	4,976	4,976	4,961	4,962	4,900	4,962	4,976	4,892
Anticipated Reserve Margin (%)	25.9%	35.0%	33.4%	32.3%	31.2%	30.4%	27.4%	27.8%	27.2%	24.4%
Prospective Reserve Margin (%)	27.3%	40.9%	39.3%	38.2%	37.0%	35.5%	32.5%	32.8%	32.1%	29.2%
Reference Margin Level (%)	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%



Planning Reserve Margins



Existing and Tier 1 Resources

MRO-SaskPower Highlights

- Over the next 10 years, MRO-SaskPower’s ARM ranges from approximately 24% to 35% and does not fall below the RML in any year. SaskPower’s recent probabilistic studies concluded that the largest contribution to EUE occurs during peak hours because of planned outages. Rescheduling maintenance can help avoid these issues.
- Saskatchewan’s average annual summer and winter peak demand growth is expected to be approximately 1.0% throughout the assessment period. Large industrial loads are the primary driver for both growth and uncertainty in SaskPower’s forecast.
- SaskPower is projected to increase its wind and solar capacity to 1,550 MW in the next three years. Natural-gas-fired generation is being added to the system to offset VERs with plans to add 525 MW nameplate of new gas-fired generation—460 MW of Tier 1 and 65 MW of Tier 2—over the next 10 years. Life extensions and repowers for coal units are in process as directed by the Saskatchewan government. SaskPower is anticipating 31.8 MW of confirmed retirements, both waste heat and wind. 174 MW of unconfirmed wind retirements may also occur over the next 10 years.
- Driven by load growth, new generation, and reliability, SaskPower is planning to expand its interconnection with SPP and add 500 MW of new transmission service over the next five years, increasing tie-line capacity to 650 MW total. Internal transmission projects totaling 180 km of new 230 kV lines are being added and an additional ~410 circuit km of transmission projects are in planning and conceptual phases over the next 5 to 10 years.
- SaskPower’s primary reliability issues include growing supply chain issues that may potentially affect their significant transmission project plans and an interdependence between Southeast Saskatchewan’s power generators and natural gas production fields. SaskPower has been managing these issues by scheduling long-lead-time components as early as possible in transmission project timelines and by working with Saskatchewan’s gas pipeline utility to coordinate and study gas system responses to losses of production receipts during power outages as incremental demand is added.

MRO-SaskPower Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031
Coal	1,249	1,249	1,249	1,249	1,249
Natural Gas	2,480	2,850	2,850	2,850	2,850
Biomass	3	3	3	3	3
Wind	164	162	162	162	162
Conventional Hydro	856	856	856	856	856
Other	17	17	1	1	1
Total MW	4,769	5,137	5,121	5,121	5,121

MRO-SaskPower Assessment

Planning Reserve Margins

Saskatchewan uses two criteria for determining adequate generating capabilities. The first method is to calculate EUE through probabilistic modeling and maintain it within an acceptable level as determined through resource adequacy analysis. The second method employs a deterministic criterion in which the reserve margin for the Saskatchewan system must not fall below the RML.

Saskatchewan uses a RML of 15% and has assessed its PRM for the upcoming 10 years considering summer and winter peak hour loads, available existing and anticipated generation resources, firm capacity transfers, and available DR for each year. During the 10-year assessment period, Saskatchewan’s ARM ranges from approximately 24% to 35% and does not fall below the RML in any year.

Energy Assessment, Including Non-Peak Hour Risk

Saskatchewan performs energy assessments using probabilistic methods to inform the area’s resource adequacy requirements. A detailed representation of the SaskPower system that includes load forecasts, capacity expansion sequences, individual unit characteristics, maintenance, and outages are included in the model. For VERs, SaskPower uses the ELCC methodology to periodically update capacity credits in the model. The model simultaneously considers many types of randomly occurring events, such as forced outages of generating units. Uncertainty in assumptions is addressed through scenario work based on the likelihood of occurrence (e.g. high/low hydro energy forecast, high/low load forecast).

These studies conclude that the majority contribution to the EUE is typically planned outages with unserved energy occurring mainly during peak hours. These short-term reliability issues, when identified, can be mitigated by rescheduling maintenance.

ProbA Results

Saskatchewan does not anticipate resource adequacy issues during its off-peak hours. Currently, its resource mix majorly consists of baseload and fast-ramping generation resources, and it does not have a considerable penetration level of intermittent energy resources.

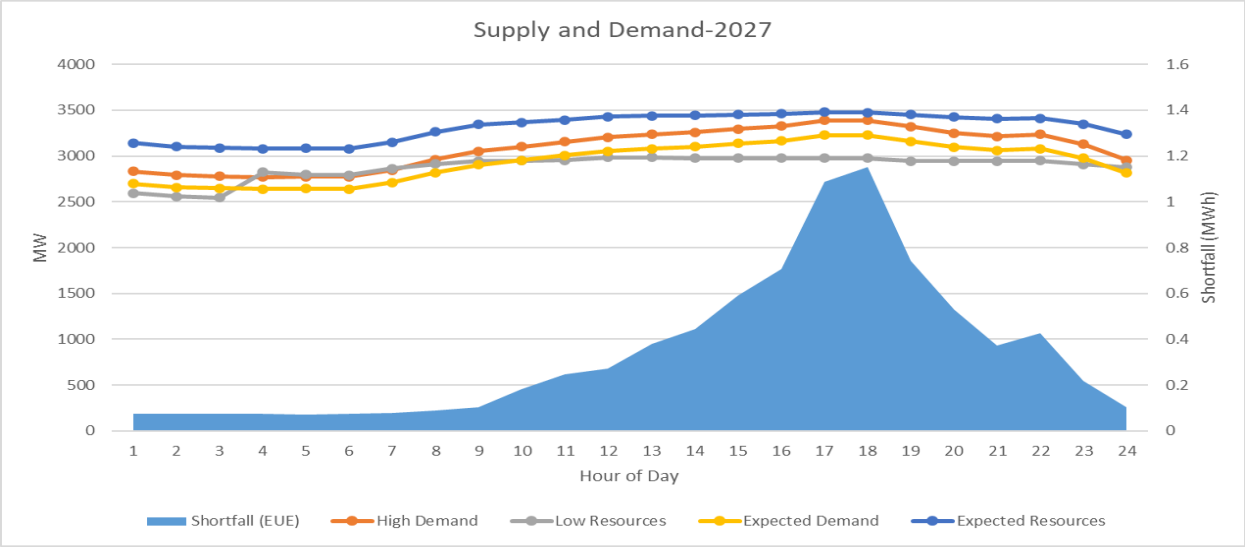
The major contribution to the EUE is planned outages. The contribution to EUE in these months occurs mainly during peak hours. These short-term reliability issues when identified can be mitigated by rescheduling the maintenance.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	75	145	5
NEUE (ppm)	2.807	5.242	0.190
LOLH (hours per Year)	0.547	1.094	0.046
* Provides the 2024 ProbA Results for Comparison			

The annual EUE heat map for 2027 is provided below.

Hourly EUE Heat Map : 2027																								
EUE	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
Jan-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Feb-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	0%	0%	0%
Mar-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Apr-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
May-27	1%	1%	1%	1%	1%	1%	1%	1%	1%	2%	2%	3%	3%	3%	3%	4%	5%	5%	3%	3%	2%	3%	2%	1%
Jun-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Jul-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%
Aug-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	1%	1%	2%	2%	1%	1%	1%	1%	0%	0%
Sep-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	1%	1%	1%	1%	0%	0%	0%
Oct-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	1%	1%	1%	0%	0%	0%
Nov-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Dec-27	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Hourly demand and resource projections for the highest EUE day in 2027 are shown in the figure below. Expected resource contributions are observed to cover expected demand on the risk day. However, there is a risk of supply shortfalls if demand is higher than expected and resource availability is lower than expected.



Demand

Saskatchewan experiences its peak season in the winter. Saskatchewan’s system peak load forecast is based on econometric variables, weather normalization, and individual level forecasts for large industrial customers. SaskPower computes a coincident peak by customer category based on a combination of historical data and other factors and aggregates the coincident peaks across classes to compute the system peak.

Large industrial loads continue to be the primary reason for both growth and uncertainty in the forecast. The average annual summer and winter peak demand growth is expected to be approximately 1.0% throughout the assessment period, down slightly from the 2024 LTRA’s projection of 1.35% average annual peak demand growth.

Demand-Side Management

Saskatchewan’s DR consists of contracts with industrial customers for interruptible load based on conditions specified in established DR programs. The first of these programs provides a curtailable load, with up to 72 MW enrolled currently, with a 12-minute event response time. Other programs are in place providing access to additional curtailable load requiring up to two hours’ notification, but those loads are not included in PRM calculations.

Distributed Energy Resources

The current behind-the-meter DER installed capacity in Saskatchewan is approximately 57 MW, which includes approximately 55 MW of solar PV and approximately 2 MW of distributed wind projects. An

additional 25 MW of DER solar PV are expected to be added in the next five years. Additional behind-the-meter DER installations are incorporated into load forecast models used for supply and transmission planning studies.

Small power producers contribute an additional 5 MW installed DER capacity (in front of the meter) in Saskatchewan. There is currently an existing 14 MW and a potential for up to 6.5 MW of DERs being added in the next year based on the currently approved Power Generation Partner program. These projects are included as generation additions, but their capacity is not currently considered in reliability planning.

Generation

Saskatchewan prepares a 10-year supply plan annually that outlines its generation plan to meet the province’s future resource needs. It considers retirements, planned and major overhauls, degradation of unit performance, escalating fuel prices, increasing capital costs, unit operating costs, and regulatory requirements. The installed capacity of non-synchronous/inverter-based generation has recently risen to 845 MW and is expected to increase to approximately 1,550 MW in the near-term planning horizon through the addition of 400 MW of wind and 300 MW of solar in the next three years. SaskPower added 370 MW of natural-gas-fired generation in 2024, which served to offset the increased net demand variations from the 220 MW of VERs added in the same year. This resulted in a slight improvement in ramping performance as compared to the last ramping assessment in 2022. SaskPower plans to add approximately 525 MW of new natural-gas-fired generation over the next 10 years and is also working to extend the life of its operational and recently deactivated coal units as directed by the Saskatchewan government.

Saskatchewan is projecting 31.8 MW (nameplate) of confirmed retirements consisting of 21.2 MW of waste heat recovery generation and 10.6 MW of wind generation. These retirements are driven by the units approaching the ends of their lifespans and terminations of power contracts. An additional 174 MW of unconfirmed wind retirements may also materialize during the 10-year assessment period.

Energy Storage

SaskPower’s first battery storage system, a 20 MW/20 MWh unit, came on-line in 2024. The prevalent use for the planned energy storage is to provide regulating reserve, peak capacity and energy reduction, net demand ramping control, reactive power/ voltage control, primary frequency control, and blackstart.

Energy Transfers

SaskPower has three interfaces with its neighboring areas. The interface with Manitoba is currently the largest of the three interfaces and is the only interface with long-term firm contracts. Capacity

transfers from Manitoba would be limited in the event of a prior outage of tie lines between SaskPower and Manitoba Hydro as well as nearby transmission facilities supporting the interface. This could only impact reliability if it is coincident with the extreme winter or summer peak demand and a prior outage of one or more larger generating units in Saskatchewan. Risk mitigation measures are in place through SaskPower’s emergency operating procedure that will allow measures such as short-term imports from available interfaces, initiating DR, and short-term load shedding.

According to the NERC’s [ITCS Canadian Analysis](#), the total simultaneous transfer capability into the Saskatchewan transmission planning region from all its neighbors, including dc-only interties, is 904 MW in the 2024 Summer and 893 MW in the 2024–2025 Winter. These values translate to approximately 25% of peak summer load and 22% of peak winter load in the analysis years. The interfaces include connections with MRO-SPP, MRO-Manitoba Hydro, and WECC-Alberta.

Transmission

SaskPower's major transmission projects in the first five years of the assessment period are related to the interconnection expansion with SPP and the 500 MW of new transmission service. This includes two new international power lines between Saskatchewan and North Dakota. Within Saskatchewan, a total of approximately 180 km of new 230 kV lines, a new 230 kV transmission station, expansion of several existing transmission stations, installation of two phase-shifting transformer interfaces, and two STATCOMs are being added. The remaining transmission projects (approximately 410 circuit km) will be in the planning or conceptual phases in the 5-to-10-year timeframe. These projects are driven by load growth, new generation additions, and reliability needs. SaskPower has historically experienced transmission limitations for existing generation deliverability in the southwest part of the province during prior outages of major transmission facilities.

Transmission infrastructure is being developed to reinforce the Northern Transmission System. SaskPower’s Northern System is not directly connected to the Southern grid, so significant load growth in the North will also require additional generation to supply the additional loads. SaskPower is looking at different ways to supply the generation to this load, including wheeling power from the South to the North through adjacent areas and temporary generation until a more permanent solution can be implemented. Planning for these projects is being driven, in part, by a projected increase in mining activity and associated development in Saskatchewan’s remote northern region. Reliable power supplies for new loads in the north will require significant transmission development.

Reliability Issues

As SaskPower is planning on constructing a significant number of transmission facilities, growing supply chain issues may affect project schedules because of long lead times for major system

components. SaskPower is identifying and initiating projects earlier that may require longer lead time and is advancing procurement as necessary.

It has been noted that there is an interdependency between Southeast Saskatchewan’s power generation and natural gas production. Saskatchewan’s pipeline utility, SaskEnergy, has completed analysis on how its system will respond to a loss of natural gas receipts during a power outage in this region as potential incremental demand is added. Both SaskPower and SaskEnergy have incorporated the potential challenges identified by that analysis into long-term planning and mitigation efforts.

SaskPower has been recently observing increasing instances of unscheduled flows on its interface with SPP and Manitoba Hydro. SaskPower is coordinating this on a regional basis with Manitoba Hydro, SPP and MISO to monitor and address the impact.

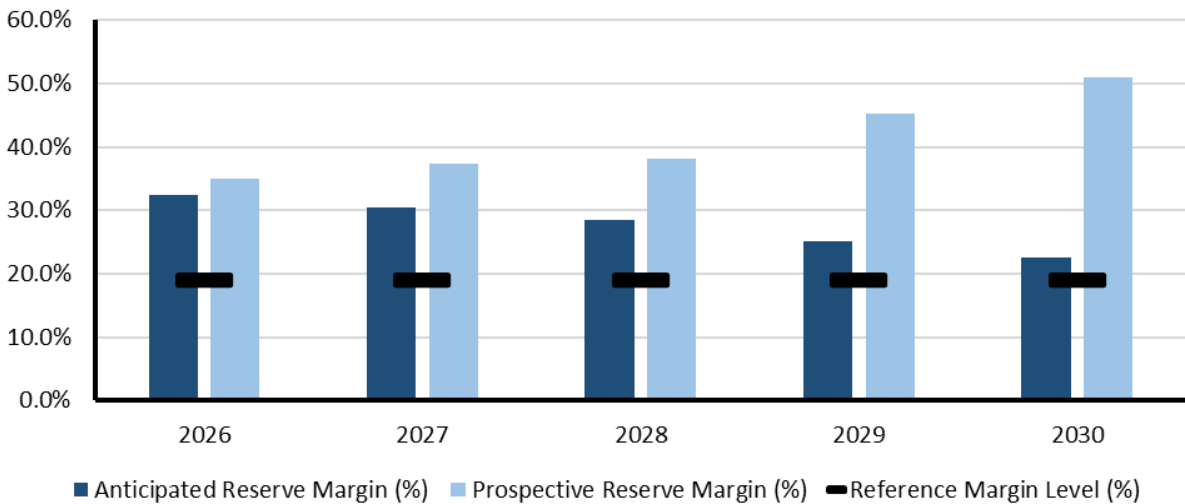


MRO-SPP

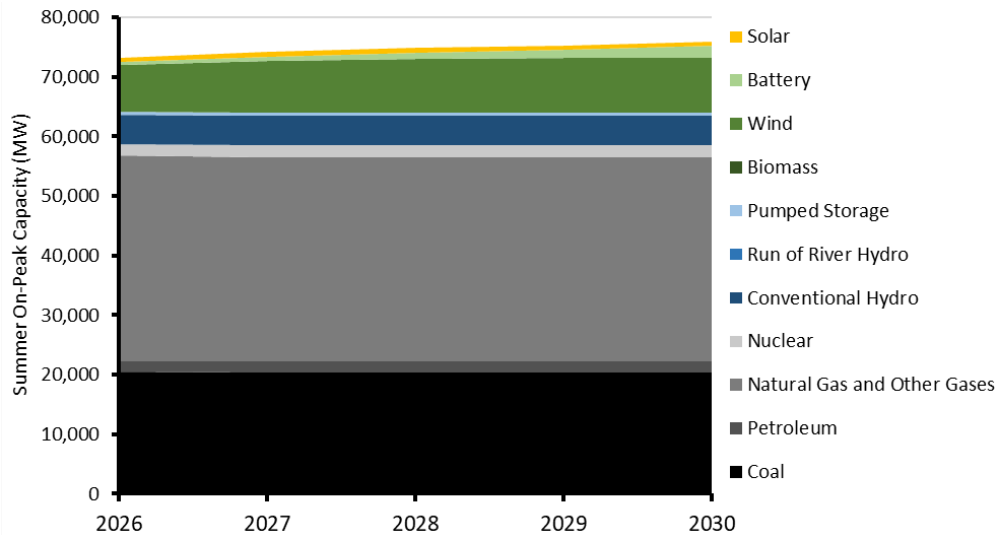
The Southwest Power Pool (SPP) PC footprint covers 546,000 square miles and encompasses all or parts of Arkansas, Iowa, Kansas, Louisiana, Minnesota, Missouri, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming. The SPP long-term assessment is reported based on the PC footprint, which touches parts of the Midwest Reliability Organization Regional Entity and the WECC Regional Entity. The SPP assessment area footprint has approximately 61,000 miles of transmission lines, 756 generating plants, and 4,811 transmission-class substations, and it serves a population of more than 18 million.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	57,479	59,121	60,689	62,766	64,475	66,283	66,982	67,570	68,049	68,622
Demand Response	2,138	2,162	2,332	2,508	2,509	2,511	2,513	2,514	2,718	2,720
Net Internal Demand	55,340	56,959	58,357	60,258	61,966	63,772	64,469	65,056	65,331	65,902
Additions: Tier 1	1,808	3,020	3,685	4,251	4,815	4,866	5,344	5,344	5,344	5,344
Additions: Tier 2	2,436	6,104	8,948	15,659	21,487	23,345	25,664	27,277	27,877	28,627
Additions: Tier 3	0	0	0	0	0	0	0	0	0	0
Net Firm Capacity Transfers	-18	-78	-78	-78	-78	-79	-79	-79	-79	-79
Existing-Certain and Net Firm Transfers	71,475	71,224	71,232	71,127	71,146	71,115	71,135	71,106	71,105	71,106
Anticipated Reserve Margin (%)	32.4%	30.3%	28.4%	25.1%	22.6%	19.1%	18.6%	17.5%	17.0%	16.0%
Prospective Reserve Margin (%)	34.9%	37.3%	38.2%	45.2%	50.9%	48.7%	51.5%	51.8%	51.8%	50.6%
Reference Margin Level (%)	19.0%	19.0%	19.0%	19.0%	19.0%	19.0%	19.0%	19.0%	19.0%	19.0%



Planning Reserve Margins



Existing and Tier 1 Resources

MRO-SPP Highlights

- The SPP assessment area peak demand occurs during the summer season; the 2025 net internal demand forecast over the 10-year time frame is projected to peak at 65,902 MW, which is a 16% increase to the all-time summer peak that SPP saw in 2023.
- SPP is seeing a slowing in retirements due to the projected PRM increases along with the separate seasonal PRM and accreditation requirements that are planned to be implemented in 2026.
- The existing-certain and net firm transfers reserve margin for the SPP assessment area is projected to fall below the current summer season PRM requirement in 2029.

MRO-SPP Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	20,473	20,440	20,440	20,428	20,428
Coal*	19,187	19,154	18,086	18,075	18,075
Petroleum	1,824	1,827	1,827	1,827	1,829
Petroleum*	1,824	1,771	1,771	1,771	1,774
Natural Gas	34,525	34,303	34,303	34,265	34,265
Natural Gas*	34,363	33,662	33,550	33,512	33,268
Biomass	35	35	35	35	35
Solar	700	700	700	700	700
Wind	7,831	8,581	9,044	9,134	9,191
Conventional Hydro	4,925	4,993	5,009	5,026	5,030
Pumped Storage	456	456	456	415	460
Nuclear	1,945	1,945	1,945	1,945	1,945
Other	281	281	281	281	281
Battery	379	833	1,027	1,472	1,949
Total MW	73,429	74,450	75,123	75,584	76,168
Total MW*	71,981	72,467	71,960	72,422	72,762
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to give formal notice to SPP are removed from the resource projection where marked.					

MRO-SPP Assessment

Planning Reserve Margins

The existing-certain and net firm transfers reserve margin for the SPP assessment area is projected to fall below the current summer season PRM requirement in 2029. SPP has approved a non-coincident 16% PRM for the 2026 Summer season and a 36% PRM for the 2026–2027 Winter season. Additionally, a non-coincident 17% PRM for the 2029 Summer season and 38% PRM for the winter season was approved as well. The PRM increases are not reflected in the 2025 LTRA as they are tied to policies that are still before FERC. Based on resources submitted in the ARM calculation, including the impact of retirements, SPP is forecasted to drop below the current 19% RML in 2032 and remain below that RML for the remainder of the 10-year horizon.

Non-Peak Hour Risk, Energy Assurance, Probabilistic-Based Assessments

SPP is performing a yearly energy adequacy assessment and assessment of adequacy of reliability attributes, which will be presented to SPP stakeholders. The results will also be used to perform for all reliability attributes a biennial assessment of the need for new market products, changes to market functionality, and changes to resource adequacy policies or requirements. Results of the biennial reassessment will be provided to impacted SPP stakeholder groups and the Regional State Committee (RSC).

Southwest Power Pool (SPP) performs an LOLE analysis every two years to determine the adequate amount of planning reserves needed to maintain a reliability metric of one day (or less) in ten years. SPP’s 2023 LOLE study supported much of the demand forecast presented in NERC’s 2024 LTRA and demonstrated how the PRM could be impacted materially depending upon how much loss of demand risk was planned for each season (winter or summer). Directed by the RTO’s Resource and Energy Adequacy Leadership Team, SPP completed an out-of-cycle 2024 LOLE analysis published in April 2025 to develop a recommendation for 2029 seasonal PRMs. This study and its results are based on the 2024 member-submitted forecast for the resource mix and demand, using the 2023 LOLE study assumptions. Member-submitted demand forecast increased approximately 5% in summer and 6% in winter for planning year 2029.

ProbA Results

The 2025 ProbA study was performed on assumptions, and the accompanying methodology reflects methods used in SPP’s LOLE studies, which have been thoroughly vetted through the SPP stakeholder process. Study improvements include additional weather years, seasonal forced outage modeling from the previous NERC probabilistic study, and incremental cold weather outages. More information on improvement and methodology can be found in SPP’s LOLE study reports.

There was no observed unserved energy for years two and four of the base-case analysis for the SPP assessment area. This is most likely attributed to an increase of conventional thermal generations more than that of renewable resources and the delayed retirements of other thermal resources to meet the increasing projected demand needs. Since there are no observed load-loss events, additional reporting is not provided.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	0	0	0
NEUE (ppm)	0.00	0.00	0.00
LOLH (hours per Year)	0.00	0.00	0.00
*Provides the 2024 ProbA Results for Comparison			

Demand

The SPP assessment area is a summer-peaking region and currently relies on the forecast submitted by the load responsible entities in the annual resource adequacy process. The 2025 net internal demand forecast over the 10-year time frame is projected to peak at 65,902 MW, which is a 16% increase to the all-time summer peak that SPP saw in 2023. Although actual demand is very dependent on weather conditions and typically includes the effects of interruptible loads, forecasted net internal demands are based on a 10-to-30-year average of summer weather, or 50/50 weather. Some SPP RTO members base their peak load forecasts on a 50% confidence level, as approved by their respective state commission(s). This means the actual weather on the peak summer day is expected to have a 50% likelihood of being hotter and a 50% likelihood of being cooler than the weather assumed in deriving the load forecast. SPP RTO members make economic assumptions in their individual forecasting methods as well consider the effects of non-controllable or dispatchable programs and resources within their area. One risk that SPP has noted is that the aggregated noncoincident demand forecast submitted by members in recent years, which is based on a 50/50 forecast and is weather normalized, is tracking at a lower demand level than what the BA has seen in recent peak season.

Although SPP’s energy projections for resource adequacy purposes differ from load interconnection process set forth in the SPP OATT, the SPP Assessment Area has received new load requests for data center, pipeline, oil and gas, irrigation and industrial load. While these loads represent above average load growth in areas, some of the load due to oil and gas exploration have decreased. Of current concern is the projected growth in the crypto load area and how much of that will turn into demand growth outside of the DR arena.

Demand-Side Management

SPP RTO members track dispatchable and controllable DR programs, which are used as peak load shaving programs. For resource adequacy purposes, the peak demand can be reduced by the impacts of the programs to determine an appropriate net peak demand for each member. SPP’s tariff requires each Load Responsible Entity (LRE) to qualify and test their programs to prove they can meet and maintain the level of reduction submitted annually in the resource adequacy compliance window. SPP is constructing new policy to more appropriately categorize DR based on the flexibility of the program, which will ultimately be reflected in the accreditation process.

Distributed Energy Resources

The SPP assessment area is forecasting ~70 MWs of DERs in the 5–10-year planning horizon. The impacts and assumptions may differ across the planning processes, for instance in some studies they may be used to reduce the load impacts whereas in other studies they may be modeled as a resource that has a high cost associated with it. SPP does not consider the impacts of BTM resource as a load reduction for purposes on resource adequacy compliance.

Generation

In general, SPP is seeing a slowing in retirements due to the projected PRM increases along with the separate seasonal PRM and accreditation requirements that are planned to be implemented in 2026. There has been minimal retirement reported since the *2024 LTRA*, and a number of resources identified in 2024 as being set to retire are now being converted to new fuel, mostly coal to gas.

The *Expedited Resource Adequacy Study* process, approved by FERC in July 2025, is providing an accelerated pathway to interconnection for generation that supports identified resource adequacy needs. The program is yielding additional natural-gas-fired, solar, and battery resource projects in SPP’s Tier 2 development queue. Nearly 8 GW of natural-gas-fired generator capacity, 2.2 GW nameplate in solar, and 1.8 GW nameplate in batteries have been added to SPP’s Tier 2 queue since

July and are not reflected in this year’s LTRA. SPP anticipates the first interconnection agreements for *Expedited Resource Adequacy Study* projects will be signed in early 2026, which will qualify these resources for Tier 1 in NERC’s reliability assessments and ProbA and count toward ARM.

Energy Storage

There are approximately 57,000 MWs of energy storage and hybrid resources in generator interconnection queues. There are about 50 MWs that are under contract by members across the SPP assessment area and 230 MW of nameplate capacity forecasted for the assessment timeframe. These resources are being modeled as generation in the planning assumptions both near and long term. Due to this limited amount of storage, limited operational impacts have been identified.

Capacity Transfers

Over the assessment time frame, SPP is forecasting, based on submitted member data, to be a net exporter of capacity. In the resource adequacy process, SPP only relies on the imports that have firm transmission service, which is ~2,000 MWs. SPP and ERCOT executed a Coordination Plan, which addresses operational issues for coordination of the dc ties between the Texas Interconnection and Eastern Interconnection, block load transfers (BLT), and switchable generation resources (SWGR). Under the terms of the Coordination Plan, SPP has priority to recall the capacity of any SWGRs that have been committed to satisfying the resource adequacy requirements contained in Attachment AA of the SPP Open Access Transmission Tariff. Annually, SPP and ERCOT update the Coordination Plan based on the latest discussions and business decisions related to resource priority.

Transmission

SPP’s [2024 Integrated Transmission Plan \(ITP\)](#) is the single largest portfolio, in terms of size and value, that SPP has proposed for construction in its 20-year history as a transmission PC. The approved plan includes 89 transmission upgrades needed to address increasing electricity consumption and changes in the region's generating fleet.

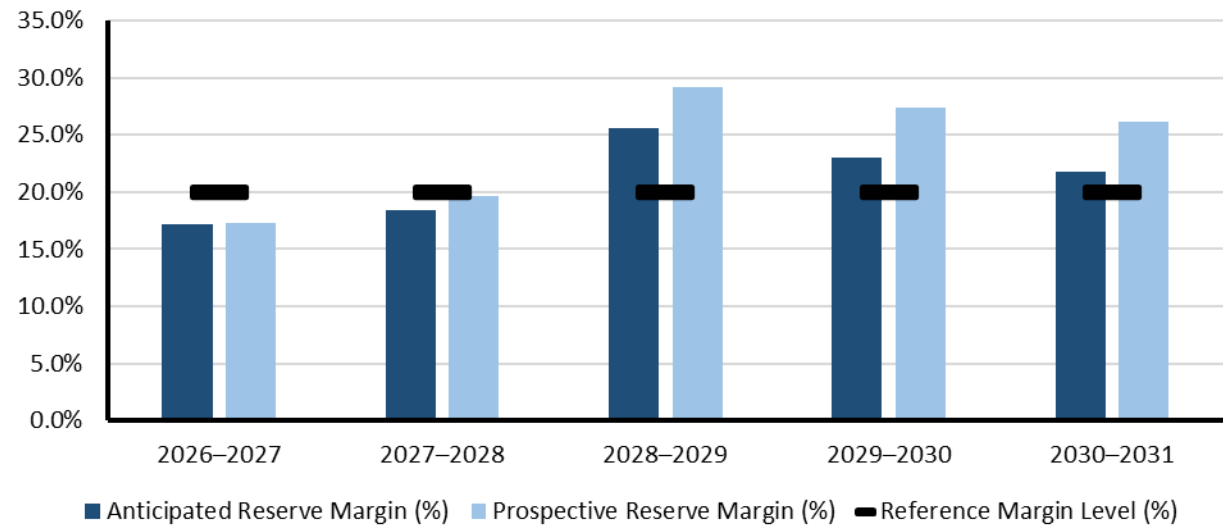


NPCC-Maritimes

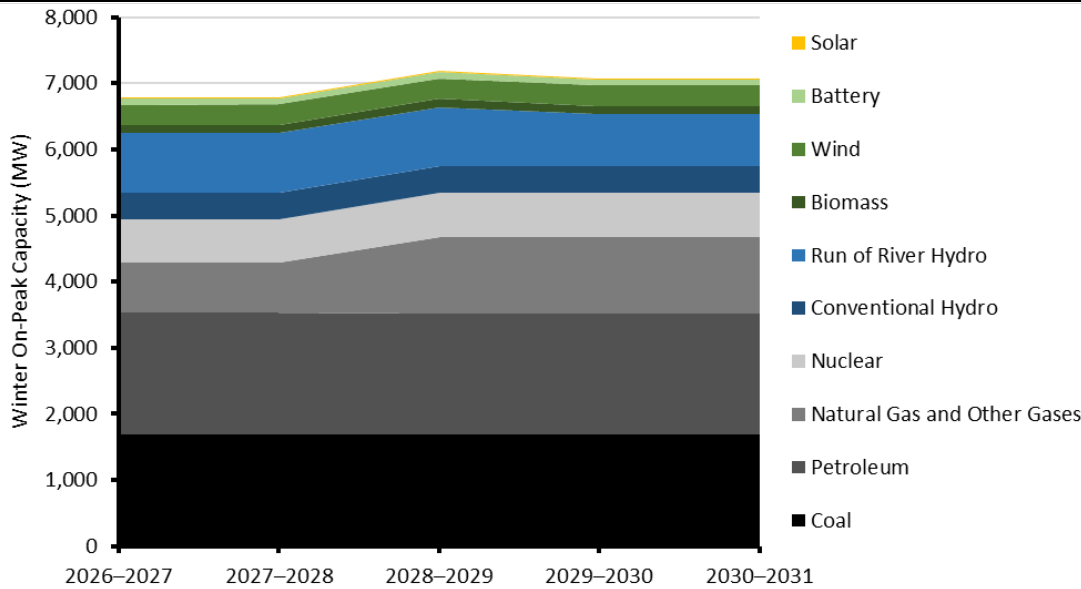
NPCC-Maritimes is an assessment area that covers the Canadian Maritime provinces—New Brunswick, Nova Scotia, and Prince Edward Island—and the northernmost portion of the U.S. State of Maine. The area covers approximately 150,000 square kilometers (58,000 square miles) and has a total population of nearly 1.9 million people. The New Brunswick Power Corporation (NB Power) is the BA for New Brunswick, Prince Edward Island, and the northern portion of Maine. Nova Scotia Power Inc. (NSPI) is the BA for Nova Scotia. NB Power’s system is electrically interconnected with NPCC-Québec and NPCC-New England, and the electric systems in the provinces of Nova Scotia and Prince Edward Island have ties with New Brunswick but no direct ties with other assessment areas. Peak electricity demand in NPCC-Maritimes occurs during the winter season.

Demand, Resources, and Reserve Margins

Quantity	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2031–2032	2032–2033	2033–2034	2034–2035	2035–2036
Total Internal Demand	6,107	6,157	6,194	6,231	6,292	6,346	6,380	6,493	6,579	6,669
Demand Response	264	283	290	291	290	291	290	291	290	290
Net Internal Demand	5,843	5,875	5,904	5,940	6,001	6,055	6,089	6,202	6,289	6,380
Additions: Tier 1	173	179	579	579	579	579	579	579	579	579
Additions: Tier 2	6	367	656	1,492	1,492	1,492	1,492	1,492	1,492	1,492
Additions: Tier 3	0	0	23	101	215	227	239	251	260	260
Net Firm Capacity Transfers	-32	75	145	145	145	145	145	145	145	145
Existing-Certain and Net Firm Transfers	6,673	6,780	6,838	6,727	6,727	6,727	6,621	6,621	6,596	6,707
Anticipated Reserve Margin (%)	17.2%	18.5%	25.6%	23.0%	21.7%	20.7%	18.2%	16.1%	14.1%	14.2%
Prospective Reserve Margin (%)	17.3%	19.6%	29.2%	27.4%	26.1%	25.0%	22.6%	20.3%	18.3%	18.3%
Reference Margin Level (%)	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%



Planning Reserve Margins



Existing and Tier 1 Resources

NPCC-Maritimes Highlights

- Since the 2024 LTRA, the overall resource outlook has diminished slightly with smaller peak capacity contributions from certain wind, hydro, and biomass resources through most of the planning period. Starting in 2026, winter peak demand forecasts for this assessment area have risen slightly from the previous year’s projection through most years of the planning horizon; however, ARMs are currently projected to remain above the RML of 20% until 2032 when the ARM dips to 18.2%.

NPCC-Maritimes Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031
Coal	1,696	1,696	1,696	1,696	1,696
Coal*	1,696	1,696	1,410	1,003	691
Petroleum	1,831	1,831	1,820	1,820	1,820
Natural Gas	757	757	1,157	1,157	1,157
Biomass	129	129	129	129	129
Solar	10	10	10	10	10
Wind	300	306	306	306	306
Conventional Hydro	395	395	395	395	395
Run of River Hydro	901	901	901	790	790
Nuclear	663	663	671	671	671
Other	98	98	89	89	89
Battery	99	99	99	99	99
Total MW	6,878	6,884	7,272	7,161	7,161
Total MW*	6,878	6,884	6,986	6,468	6,156
* Capacity with additional generator retirements. Generators that are being considered for retirement but have not been confirmed are removed from the resource projection where marked.					

NPCC-Maritimes Assessment

Planning Reserve Margins

The RML that is used for evaluating the New Brunswick (NB), Nova Scotia (NS), Prince Edward Island (PEI), and Northern Maine (NM) sub-areas comprising the Maritimes area is 20% of firm load. The 20% criterion is not a mandated requirement. The ARM over the study period for the Maritimes area ranges between 14% to 26% during the winter period and between 74% to 90% during the summer period.

The ARM level during off-peak season for the Maritimes areas ranges between 74% to 90%. During off-peak hours, the Maritimes area has surplus generation available to meet the area’s energy needs and hence there are no constraints with converting the capacity to energy during these times.

The two BAs within the Maritimes area, as members of the NPCC, jointly prepare annual interim or comprehensive probabilistic assessment reviews that cover three to five-year forward-looking periods for both the area’s transmission system and resource adequacy evaluations. In addition, the Maritimes area also supports NERC’s annual seasonal probabilistic assessments which provides an evaluation of generation resource and transmission system adequacy that will be necessary to meet projected seasonal peak demands and operating reserves.

Energy Risk

During off-peak hours, the Maritimes area has surplus generation available to meet the area’s energy, needs and hence there are no constraints with converting the capacity to energy during these times.

The two Balancing Authorities within the Maritimes Area as members of the Northeast Power Coordinating Council (NPCC) jointly prepare annual interim or comprehensive probabilistic assessment reviews that cover three- to five-year forward-looking periods for both the area’s transmission system and resource adequacy evaluations. In addition, the Maritimes area also supports NERC’s annual and seasonal ProbAs, which provide an evaluation of generation resource and transmission system adequacy that will be necessary to meet projected seasonal peak demands and operating reserves.

ProbA

For the Maritimes area, the ProbA indicates elevated levels of unserved energy in February 2028 due to load growth projections and the characteristics of the resource mix during that period and with a few hours of risk in the shoulder months of December and January.

Annual metrics and requested enhancements including EUE heat maps, loss of load event analysis, and risk period visualizations for both 2027 and 2029 are included in the ProbA appendix.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	5	15	7
NEUE (ppm)	0.17	0.52	0.25
LOLH (hours/year)	0.09	0.25	0.10
*Results from the 2024 ProbA simulations			

Resource additions described in the Generation section below contribute to the improved EUE and LOLH metrics for study year 2029.

Demand

There is no regulatory requirement for a single authority to produce a forecast for the whole Maritimes area. The peak area demand occurs in winter and is highly reliant on the forecasts of the two largest sub-areas of NB and NS, which are historically highly coincidental. Demand for the Maritimes area is determined to be the non-coincident sum of the peak loads forecasted by the individual sub-areas. The aggregated growth of both demand and energy for the combined sub-areas see an upward trend over summer and winter seasonal periods of the LTRA assessment period.

The Maritimes area peak loads are expected to increase by 8% during summer and by 10% during winter seasons over the 10-year assessment period. This translates to compound average growth rates of 0.8% in summer and 1% in winter. The Maritimes area annual energy forecasts are expected to increase by a total of 6.6% during the 10-year assessment period for an average growth of 0.7% per year. Demand and energy forecasts have risen since the 2024 LTRA, due in large part to rural-to-metropolitan population migration and the proliferation of heat pump technology in local areas previously heated by fossil fuels, primarily in the PEI region.

Demand-Side Management

Plans to develop up to 100 MW by 2030–2031 of controllable direct load control programs using smart grid technology to selectively interrupt space and/or water heater systems in residential and commercial facilities are underway but no specific annual demand and energy saving targets currently exist. During the 10-year LTRA assessment period in the Maritimes area, annual amounts for summer peak demand reductions associated with EE and conservation programs rise from 21 MW to 147 MW

while the annual amounts for winter peak demand reductions rise from 177 MW to 652 MW.³⁷ The total controllable and dispatchable DR increases from 328 MW to 337 MW in the summer period while increasing from 248 MW to 290 MW in the winter period.

Distributed Energy Resources

The DER installed capacity in NS is approximately 300 MW at present, including distribution-connected wind projects under purchase power agreements, small community wind projects under a feed-in tariff and BTM solar.

LTRA wind capacity for NB, NS, and PEI is de-rated between 18% and 33% using probabilistic methods to calculate equivalent perfect capacities for each sub-area excluding NM, which uses seasonal capacity factors. Behind-the-meter (BTM) solar is assumed to have an ELCC of 0% during the winter period. The Maritimes area has shown embedded BTM solar PV projections of 204 MW in 2025 rising to 1,261 MW by 2035. These projects include distributed small-scale solar (mainly rooftop) projects that fall under the net metering program and serve as a reduction in load mainly in the residential class. The forecasted increase in solar installations in the coming years is a result of initiatives including municipal and provincial incentive programs. There is no capacity contribution from solar generation due to the timing of area’s system peak which occurs either before sunrise or after sunset in the winter period.

Generation

NB plans to extend 28 MW diesel fired generator starting in 2025 and recently upgraded 277 MW of natural-gas-fueled resource completed in 2023. An anticipated replacement PPA contract, a long-term firm energy contract from neighboring jurisdiction, and opportunities to buy in day-ahead and real-time markets will be utilized to maintain the overall resource adequacy.

In New Brunswick, Tier 1 resources include 63 MW (installed capacity) of wind and 400 MW of combustion turbines. Tier 2 resources include 546 MW of wind resources and 72 MW of biomass.

In Nova Scotia, Tier 1 resources include wind projects with a total installed capacity of 635MW phased-in from 2025–2027. These projects include 306 MW as part of the provincial Rate Base Procurement program, a 168 MW wind project, a 12.5 MW wind project, and a 148 MW wind project under the Renewable to Retail tariffs. Tier 1 resources in NS also include a 150 MW battery (2025–2026). Tier 2 resources in NS include 600 MW of combustion turbines (2027–2029); a 150 MW conversion of a coal-fired unit to natural gas (2028); 459 MW conversion of coal-fire units to oil (2030); 250 MW of batteries (2027–2029); 262 MW of wind projects as part of the provincial Green Choice Program

³⁷ Current and projected EE effects based on actual and forecasted customer adoption of various DSM programs with differing levels of impact are incorporated directly into the load forecast for each of the areas but are not separately itemized

(2028–2029); and approximately 100 MW of solar independent power producer (IPP) projects (2026-2029) with an ELCC of 0%. Tier 3 resources in NS include new wind generation with a nameplate capacity of 1400 MW phased in from 2029-2034.

PEI has 30 MW installed capacity of tier 2 wind, 111 MW tier 3 wind, 140 MW of tier 3 Petroleum based generation and 10 MW of tier 3 batteries.

NB de-rates its wind capacity using a calculated year-round equivalent capacity of 22%. NS and PEI de-rate wind capacity to 18% and 17% respectively of nameplate based on year-round calculated equivalent load carrying capabilities for their respective individual sub areas. The peak capacity contribution of grid based solar is estimated at zero since the Maritimes Area peak occurs in the winter either before sunrise or after sunset.

Energy Storage

NS Power includes a 150 MW (4-hour duration) nameplate standalone battery resource as a Tier 1 resource (2025–2026) and a 250 MW (4-hour duration) nameplate capacity standalone battery resource added as a Tier 2 resource (2027–2029). These grid scale projects will support the integration of new renewable generation, provide energy arbitrage and resiliency services, and provide firm capacity and fuel savings.

PEI includes a 10 MW nameplate capacity hybrid energy storage as a Tier 3 resource starting summer of 2028.

NB Power has not included any energy storage resources in the 2025 LTRA submission; however, the value of energy storage options is expected to increase as the technology improves and as NB’s smart grid network develops. NB Power issued a request for expressions of interest (REOI) for new renewable generation sources, including 200 MW wind, 15 MW solar, 5 MW tidal, and 50 MW 4-hour duration battery storage in February 2023. Under this program, NB Power expects uptake in new energy storage projects in the coming years. Internal pilot projects and studies are underway to understand the economics, application, and performance of battery storage resources. Ongoing internal analyses are conducted by NB Power to determine the cost and benefit associated with battery storage options and dispatching these resources to reduce/shift peaks and/or balance intermittent resources such as wind to provide additional flexibility to the system.

in the forecasts. Since controllable space and water heaters will be interrupted via smart meters, the savings attributed to these programs will be directly and immediately measurable.

Capacity Transfers

Probabilistic studies show that Maritimes area is not reliant on inter-area capacity transfers to meet NPCC resource adequacy criteria.

Transmission

NS has multiple new transmission line projects compared to the 2025 LTRA, most being shorter runs to enable the connection of renewable resources, with one major project of 165 miles designed to improve the reliability of the existing tie between NS and NB.

Reliability Issues

The Maritimes area has a diversified mix of capacity resources fueled by oil, coal, hydro, nuclear, natural gas, wind (de-rated), dual fuel oil/gas, tie benefits, and biomass with no one type feeding more than about 32% of the total capacity in the area. The Maritimes area does not anticipate fuel disruptions that pose significant challenges to resource during the assessment period.



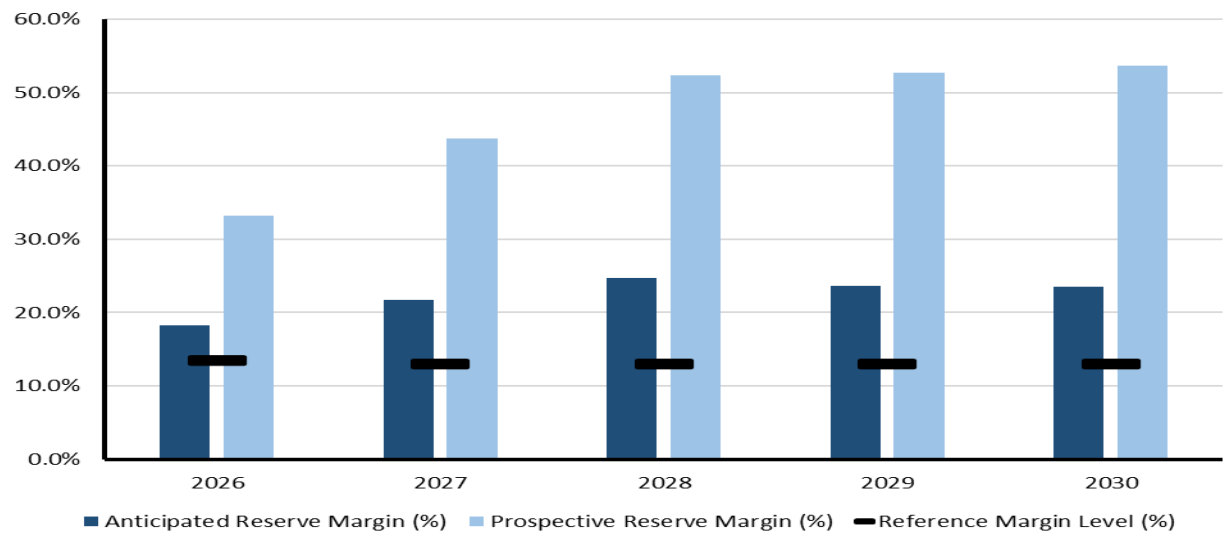
NPCC-New England

NPCC-New England is an assessment area consisting of the states of Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont served by ISO New England Inc. (ISO-NE). ISO-NE is a regional transmission organization responsible for the reliable day-to-day operation of New England’s bulk power generation and transmission system, administration of the area’s wholesale electricity markets, and management of the comprehensive planning of the regional BPS.

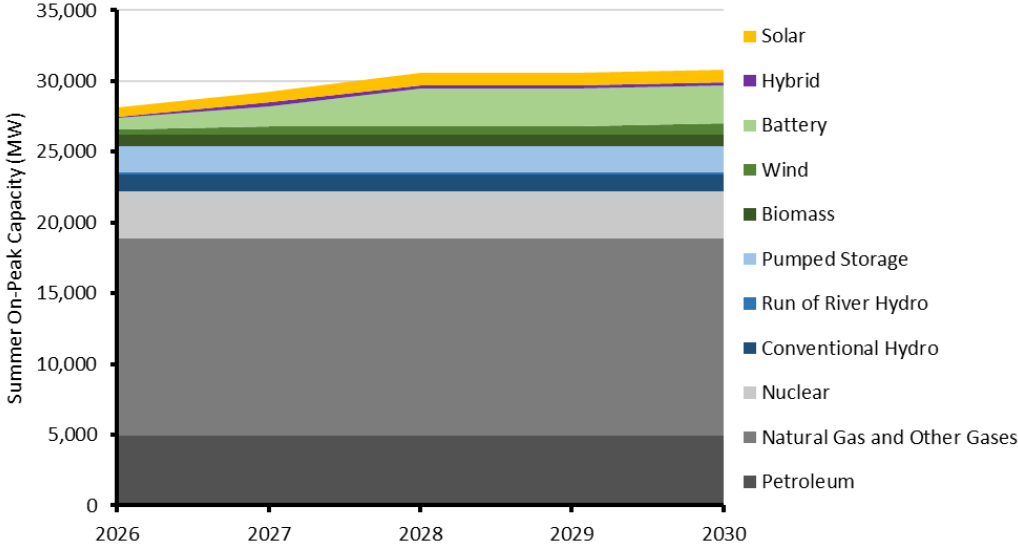
The New England BPS serves approximately 14.5 million customers over 68,000 square miles.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	24,877	24,945	25,124	25,347	25,557	25,821	26,123	26,486	26,897	27,331
Demand Response	623	544	544	544	544	544	544	544	544	544
Net Internal Demand	24,254	24,401	24,580	24,803	25,013	25,277	25,579	25,942	26,353	26,787
Additions: Tier 1	1,081	2,183	3,543	3,551	3,781	3,781	3,913	3,913	4,263	4,263
Additions: Tier 2	1,113	2,871	4,274	4,687	5,037	5,037	5,037	5,387	5,387	5,387
Additions: Tier 3	872	4,129	10,335	11,426	11,830	12,924	12,924	12,924	12,924	12,924
Net Firm Capacity Transfers	567	465	84	84	84	84	84	0	0	0
Existing-Certain and Net Firm Transfers	27,607	27,505	27,124	27,124	27,124	27,124	27,124	27,040	27,040	27,040
Anticipated Reserve Margin (%)	18.3%	21.7%	24.8%	23.7%	23.6%	22.3%	21.3%	19.3%	18.8%	16.9%
Prospective Reserve Margin (%)	33.2%	43.7%	52.3%	52.7%	53.7%	52.1%	50.8%	49.7%	48.7%	46.3%
Reference Margin Level (%)	13.4%	13.0%	13.0%	13.0%	13.0%	13.0%	13.0%	13.0%	13.0%	13.0%



Planning Reserve Margins



Existing and Tier 1 Resources

NPCC-New England Highlights

- New England is forecast to have sufficient seasonal ARMs needed to meet consumer demand for electric energy for the entire assessment period (2026–2035) and not require any Tier 2 resources.
- Ongoing developments of wind facilities and a new interregional tie with Canada (the [New England Clean Energy Connect](#)) as well as new technologies (such as longer-duration electricity storage) will likely continue the trend toward a cleaner, albeit more complex, power system. ISO-NE is addressing the issues brought on by grid transformation through a number of planning, operational, and market measures.
- The summer ARMs do not fall below the annual RMLs for the entire assessment period. The summer ARMs range from a surplus high of 3,213 MW (26% ARM) in Summer 2028 and then decrease each year to a low of 1,356 MW (18% ARM) in 2035.

NPCC-New England Projected Generating Capacity by Energy Source in Megawatts (MW) ³⁸					
	2026	2027	2028	2029	2030
Petroleum	4,899	4,899	4,899	4,899	4,899
Natural Gas	13,939	13,939	13,939	13,939	13,939
Biomass	776	776	776	776	776
Solar	645	726	864	872	872
Wind	416	622	622	622	852
Conventional Hydro	1,165	1,165	1,165	1,165	1,165
Run of River Hydro	179	179	179	179	179
Pumped Storage	1,864	1,864	1,864	1,864	1,864
Nuclear	3,351	3,351	3,351	3,351	3,351
Hybrid	96	287	287	287	287
Battery	791	1,416	2,638	2,638	2,638
Total MW	28,121	29,223	30,584	30,591	30,821

- The winter ARMs do not fall below the annual RMLs for the entire assessment period.

³⁸ MW totals reflect existing and Tier 1 generation. Generator retirements in this timeframe would be captured if a resource submits a retirement request through the ISO-NE capacity market.

NPCC-New England Assessment

The summer ARMs do not fall below the annual RMLs for the entire assessment period. The summer ARMs range from a surplus high of 3,213 MW (26% ARM) in Summer 2028 and then decrease each year to a low of 1,356 MW (18% ARM) in 2035.

The winter ARMs do not fall below the annual RMLs for the entire assessment period. The winter ARMs range from a surplus high of 10,651 MW (66% ARM) in winter 2027–28 and then decrease each year to a surplus low of 4,522 MW (30% ARM) in winter 2035–36. The larger surpluses during winter (vs. summer) reflect the fact that New England is currently summer-peaking.

With the continued development of renewable and clean energy resources, the system will continue to emit lower air emissions.

Planning Reserve Margins

ISO-NE’s installed capacity requirement (ICR) is based on the capacity needed to meet NPCC’s resource adequacy reliability criterion. The ICR varies from year to year depending on projected system conditions. The ICR is calculated on an annual basis, in advance of the capacity auctions for each Capacity Commitment Period (CCP). The latest ICR calculations result in an LTRA annual RML of 13% in 2026 and 2027, expressed in terms of the annual 50/50 peak demand forecast. For the years 2028 through 2035, ISO-NE continued to use the last available RML value of 13%.

Energy Risks (Including Non-Peak Hour Risk)

ISO-NE routinely prepares a 21-day energy assessment forecast and report. These forecasts incorporate weather, transmission topology, resource capability and availability, fuel inventories and constraints, and projected imports/exports. If the regional supply/demand balance is projected to be negative, then projected energy deficiencies can trigger energy alerts or energy emergencies that are then disseminated to market participants and federal and state regulators. This early notification of potential electricity shortages should incentivize market participants to procure whatever is necessary (fuel) to follow future ISO dispatch orders. ISO-NE publishes its 21-day energy assessments every 2 weeks during spring, summer, and fall and then increases these publications to weekly (and/or daily if necessary) during the winter.

ISO-NE worked with the Electric Power Research Institute (EPRI) to develop the Probabilistic Energy Adequacy Tool (PEAT) framework. The modeling results for the near-term PEAT assessments show for Summer 2027 that no energy shortfalls were observed in any of the events. One operating reserve shortfall was observed within a long-duration heat wave coincident with low wind scenario. For Winter 2027, a range of energy shortfall risks and associated probabilities were observed:

- The energy shortfall risk appears manageable over a 21-day period.

- These modeling results are consistent with the significant quantities of PV (BTM and utility scale), wind, and energy/electricity storage expected while experiencing minimal load growth.
- Operating risks may be mitigated by incremental imports from large inter-area transmission interconnects.

The modeling results for Summer 2032 also show that no energy shortfalls were observed in any of the hours of the 21-day period and only 1 hour of 30-minute reserve shortfall was observed. Baseline studies of Summer 2032 events indicate an energy shortfall risk similar to that of Summer 2027 events.

The modeling results for Winter 2032 show that the energy adequacy risk profile is dynamic and will be a function of the evolution of both supply and demand profiles. These results also reveal the range of energy shortfall risk under a variety of resource mix and demand assumptions. In terms of magnitude and probability, baseline studies of Winter 2032 events indicate an energy shortfall risk profile akin to that of Winter 2027 event studies.

Probabilistic Assessments (ProbA and Other Studies)

In conjunction with NPCC, ISO-NE conducts annual probabilistic resource adequacy assessments to identify regional capacity resource needs and to comply with NPCC/NERC reliability criterion/requirements. In the transmission assessment domain, revisions to ISO-NE planning processes reflect the changing resource characteristics, probabilistic study assumptions, and changes to national and regional criteria. Coordinated transmission planning activities with neighboring systems will continue in support of the New England states’ policy objectives of providing access to a greater diversity of clean energy resources and to comply with environmental regulations.

New England is a summer-peaking area. For the ProbA years, New England presents negligible risks in 2027 and very low risk in 2029 based on the ProbA results shown below.

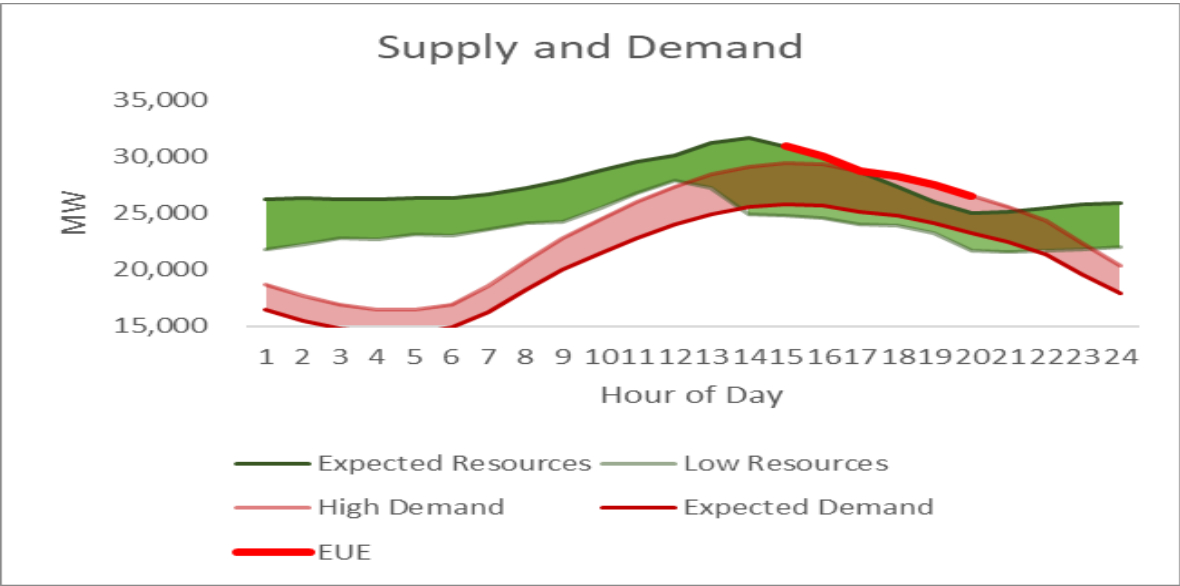
NPCC New England Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	10.7	0.1	1.8
NEUE (ppm)	0.1	0.0	0.0
LOLH (hours per Year)	0.1	0.0	<0.1
* Provides the 2024 ProbA results for Comparison			

EUE Heat Map – 2029

For the 2029 summer season, the highest EUE risks are driven by high demand and low resources availability.

Month	Hour																							
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2%	10%	33%	24%	1%	0%	0%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	5%	19%	5%	0%	0%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

The figure below illustrates hourly demand and resource projections for the highest EUE day in 2029.



Demand

For its 2025 forecast, ISO-NE has updated its long-term forecast methodology to include hourly modeling of all load components, incorporation of climate-adjusted weather in forecast simulation, redefinition of gross load to reflect reconstitution for BTM solar PV (BTM PV) only, and an expanded forecast horizon that extends to 2045. This new base load forecast also already implicitly accounts for the load reduction from EE.

Over the 10-year LTRA planning horizon, the forecast net internal summer peak demand increases by 2,094 MW from 24,803 MW in 2025 to 26,897 MW in 2034. The corresponding net internal winter peak demand increases by 5,964 MW from 20,056 MW in 2025–26 to 26,020 in 2034–35. Net energy for load is forecast to grow by 13,403 GWh from 117,262 GWh in 2025 to 130,665 GWh in 2034. These peak growth projections have not changed significantly since the 2024 LTRA. The energy growth projection has decreased as well since the 2024 LTRA.

The higher winter peak growth rate due to anticipated electrification results in convergence with summer peak projections by the end of the 10-year period, such that New England’s transition to a winter-peaking system is currently anticipated by the mid-2030s. It is also expected that the timing of the peaks will likely occur in the morning by that time, with heating electrification in particular inducing a greater tendency for morning peaks due to electrified residential and commercial heating.

Demand-Side Management (DR/DSM)/Distributed Energy Resources (DER)

For Summer 2026, ISO-NE forecasts 623 MW of controllable and dispatchable DR/DSM resources, which is projected to decrease to 544 MW by the summer of 2027. That value is then held constant through the rest of the assessment period.

For summer months, the results of the BTM PV forecast are incorporated into the ISO-NE gross demand forecast as estimated reductions in demand. In the summer of 2026, New England is expected to have 1,759 MW (5,093 MW nameplate) of BTM PV. BTM PV is forecast to grow to 1,942 MW (7,359 MW nameplate) by 2031. The winter capacity contribution for BTM PV resources is currently 7 MW (5,372 MW nameplate) in the winter of 2026–27 and increases to 521 MW (9,360 MW nameplate) in the winter of 2035–36.

In 2024, ISO-NE developed a new [Planning Procedure 12](#) entitled *Data Collection for Distributed Energy Resources* to formalize and standardize data collection for DERs. Under this new planning procedure, distribution providers are responsible for providing installation-level data on DERs connected to their system (these DERs do not include DR, controllable loads, or other load modifiers). Additionally, transmission providers are responsible for providing data to translate feeder IDs into substation names and other useful identifying information. Among the other benefits, this planning procedure will allow for proper accounting of the location, size, and type of DER, which will lead to more accurate operational and planning studies.

Generation

The two largest changes that will impact New England’s generation fleet are the changes to the methodology for capacity accreditation and the development of a seasonal, prompt capacity market. Efforts are underway to change the timing and commitment horizons of capacity auctions to

seasonal/prompt in preparation for the evolving resource mix the [Capacity Auction Reforms Key Project](#).

While ISO-NE does not expect any reliability impacts due to the retirement of any one single unit or station, the past and future retirements of dispatchable, fossil-fueled capacity, with on-site fuel inventories, as well as potential nuclear plant retirements, continue to exacerbate known winter reliability issues related to natural gas availability.

Energy Storage

New England has a total of 2,331 MW/2,110 MW (summer/winter rating) of energy storage capacity. Among the largest energy storage resource(s) in New England are three pumped-storage hydro-electric facilities that can supply a combined 1,864 MW / 1,861 MW (summer/winter rating) of quick-start 10-minute operating reserve capability, and with full reservoirs, can produce over 11,800 MWh of energy.

New England currently has 467 MW/249 MW (summer/winter rating) of electricity storage, including traditional battery storage along with integrated hybrid and co-located hybrid electricity storage.

As of April 1, 2025, there were 16,885 MW (summer ratings) of electricity storage devices (batteries, integrated-hybrid, and co-located-hybrid) that have submitted interconnection requests for installation over the next five years under the combined resource categories of Tier 1 at 2,658 MW, Tier 2 at 3,258 MW, and Tier 3 at 10,969 MW.

No new pumped-storage facilities are planned for the region. Over the next 10 years, those total Tier 1–3 capacities do not increase/decrease from their 5-year projection.

Capacity Transfers (Reliance on Assistance)

New England is interconnected to three BAs: Québec, Maritimes, and New York. ISO-NE considers the tie benefits associated with these BAs within its capacity market methodology to meet the regional resource adequacy criterion while preventing over-reliance on such assistance. Assumed assistance from tie benefits ranges from 2,100 MW in 2026 to 2,115 MW in 2027. Aside from such assistance, ISO-NE’s firm capacity imports are projected to range from a maximum of 567 MW in the summer of 2026 to 84 MW in the summer of 2028. There is one long-term firm import contract of 84 MW that extends from Summer 2028 through Summer 2032.

Within the 2025 LTRA Prospective Resources (and Prospective Reserve Margin in the Demand, Resources, and Reserve Margins table), a summer and winter, energy-only contract is identified (i.e., expected imports). These numbers reflect the upcoming commercialization (in late 2025) of the New

England Clean Energy Connect (NECEC), a new 1,200 MW tie line connecting Québec to Lewiston, Maine. An off-take 1,090 MW energy-only contract into Maine/New England has been executed. This import of 1,090 MW reflects the average hourly rate of the total annual energy in the contract.

In addition, there are no firm exports identified over the 10-year LTRA summer or winter assessment periods.

Transmission

Transmission expansion in New England has improved the overall level of reliability and resiliency, reduced air emissions, and lowered wholesale market costs by nearly eliminating congestion. Generator retirements, off-peak system needs, the growth of DERs and VERs that use inverter-based technology and changes to mandatory planning criteria promulgated by NERC and NPCC have driven the need for increasingly complex transmission assessments.

The future reliable and economic performance of the system is expected to continue to improve because of planned transmission upgrades over the next 10 years. Generator retirements, the integration of many DERs and VERs, the use of inverter-based technologies, and issues arising from minimum load assessments and high-voltage conditions are changing the needs for reliability-based transmission upgrades. In addition, transmission improvements will also be needed to support state policies to access remotely located sources of clean energy and serve increased load as transportation and heating are electrified. ISO-NE’s longer-term transmission planning process was developed through coordination with NESCOE to create an additional path toward meeting these future system needs.

Reliability Issues

New England’s power system is transitioning to a system with unprecedented projected demand growth and a growing number of renewables, clean energy resources, VERs, and DERs. ISO-NE has been engaged in the implementation of revised interconnection standards for VERs and DERs that will ensure overall power system reliability and facilitate the economic development of IBRs.

ISO-NE has observed some delays in projected “in-service” dates for transmission system upgrades due to supply chain issues. In these cases, ISO-NE develops special operating plans to work around any issues caused by these commercialization delays.

New England has already experienced constraints on electric energy production due to the availability of natural gas during winter. In winter, the interstate natural gas pipelines serving New England run full with (firm) gas utility contracts serving their residential, commercial, and industrial (RCI) customers. In response, ISO-NE has been a key player at the national level in promoting electric/gas

communications/coordination, sharing of lessons learned, best practices, and more recently, through the performance of more detailed and in-depth deterministic and probabilistic energy assessments.

The just-in-time delivery of a generator’s fuel supply, whether natural gas, wind, or solar, is creating the need for the electric sector to quickly develop ways to retain access to flexible, stored energy/electricity—either through long-term energy/electricity storage solutions that can capture and store renewable power or through the use of flexible, dispatchable resources.

ISO-NE is actively working on numerous major projects as part of its energy transition while ensuring continued reliability. The following is a short list of major projects in which ISO-NE has engaged:

- [Capacity Auction Reforms](#)
- [Operational Impacts of Extreme Weather Events](#)
- [Day-Ahead Ancillary Services Initiative](#)
- [2024 Economic Study](#)
- [Extended-Term Transmission Planning Tariff Changes](#) (aka Longer-Term Transmission Planning (LTTP) Tariff Changes)
- [Longer-Term Transmission Studies](#)
- [Storage As Transmission Only Asset](#)
- [FERC Order No. 1920 Project](#)
- [FERC Order No. 2023 Project](#)
- [FERC Order No. 2222 Project](#)

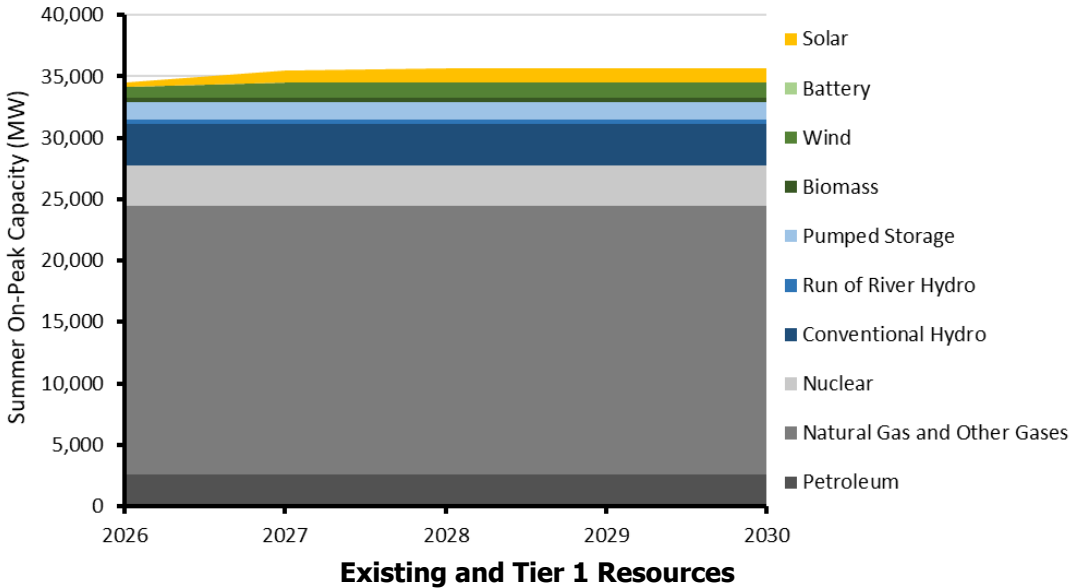
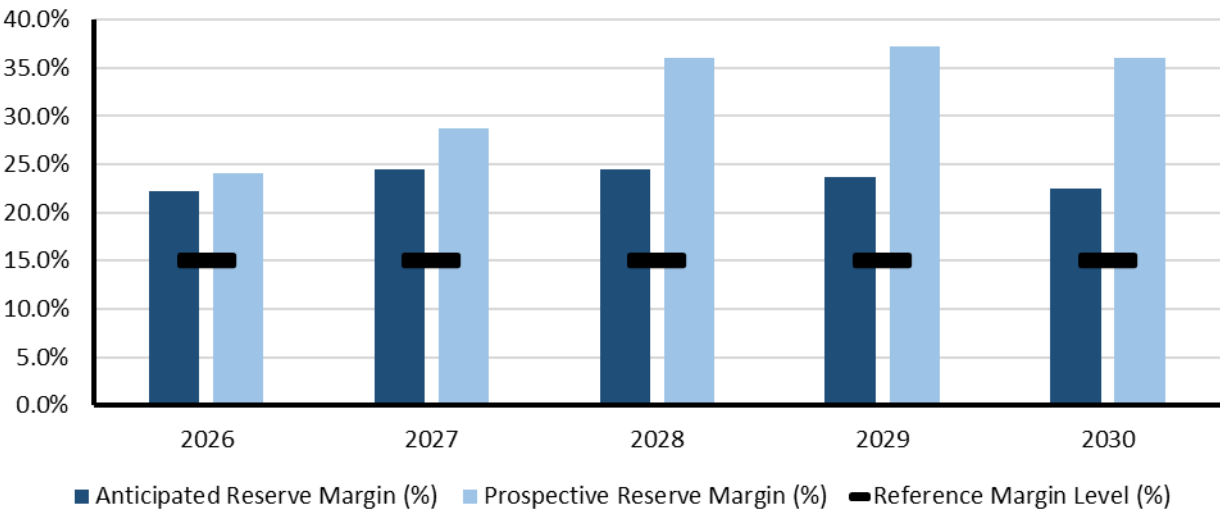


NPCC-New York

NPCC-New York is an assessment area consisting of the New York ISO (NYISO) service territory. NYISO is responsible for operating New York’s BPS, administering wholesale electricity markets, and conducting system planning. NYISO is the only BA within the state of New York. The BPS encompasses over 11,000 miles of transmission lines and 760 power generation units and serves 20.2 million customers. For this LTRA, the established RML is 15%. Wind, grid-connected solar, and run-of-river totals were derated for this calculation. However, New York requires load-serving entities to procure capacity for their loads equal to their peak demand plus an Installed Reserve Margin (IRM). The IRM requirement represents a percentage of capacity above peak load forecast and is approved annually by the New York State Reliability Council (NYSRC). The NYSRC approved the 2025–2026 IRM at 24.4%.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	31,990	32,280	32,410	32,620	32,910	33,190	33,520	33,870	34,170	34,500
Demand Response	989	989	989	989	989	989	989	989	989	989
Net Internal Demand	31,001	31,291	31,421	31,631	31,921	32,201	32,531	32,881	33,181	33,511
Additions: Tier 1	532	1,509	1,660	1,660	1,660	1,660	1,660	1,660	1,660	1,660
Additions: Tier 2	574	1,317	3,642	4,313	4,313	4,313	4,313	4,313	4,313	4,313
Additions: Tier 3	150	1,516	9,280	19,034	25,847	28,035	28,035	28,526	29,009	29,009
Net Firm Capacity Transfers	3,405	3,486	3,486	3,486	3,486	3,486	3,486	3,486	3,486	3,486
Existing-Certain and Net Firm Transfers	37,368	37,449	37,450	37,450	37,450	36,995	36,995	36,995	36,995	36,995
Anticipated Reserve Margin (%)	22.3%	24.5%	24.5%	23.6%	22.5%	20.0%	18.8%	17.6%	16.5%	15.4%
Prospective Reserve Margin (%)	24.1%	28.7%	36.1%	37.3%	36.0%	33.4%	32.1%	30.7%	29.5%	28.2%
Reference Margin Level (%)	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%



NPCC-New York Highlights

- Generator deactivations are outpacing new supply additions. Electrification programs and new large-load customers associated with economic development initiatives are pushing projected demand higher. Together, these forces are also narrowing reliability margins across New York and increasing the risk of future reliability needs.
- As public policy goals seek to decarbonize the grid, fossil-fired generation will be needed for reliable power system operations until the capabilities it offers can be supplied by other resources. EE and demand-side management (DSM) will continue to play a key role in reducing energy consumption, lowering costs, and mitigating environmental impacts.
- Some of the risks can be mitigated by repowering. Repowering aging power plants can lower emissions, meet rising consumer demand, and provide reliability benefits to the grid that are needed to integrate additional clean energy resources.
- New York is projected to become a winter-peaking electric system by the 2040s, driven primarily by electrification of space heating and transportation. On the coldest days, the availability of natural gas for power generation can be limited, and interruptions to natural gas supply will introduce further challenges for reliable electric grid operations.
- Driven by public policies, new supply, load, and transmission projects are seeking to interconnect to the grid at record levels. NYISO’s interconnection processes continue to evolve to balance developer flexibility with the need to manage the process to more stringent time frames. New processes have been implemented to accelerate the process while protecting grid reliability.
- The competitive wholesale electricity markets administered by NYISO support reliability while minimizing costs to consumers. Competitive wholesale markets are essential to a reliable, affordable, and cleaner grid of the future.
- NYISO’s 2025 Quarter 3 Short-Term Assessment of Reliability (STAR)³⁹ report identified short-term reliability needs in New York City and Long Island due to generation deactivations.

NPCC-New York Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Petroleum	2,597	2,597	2,597	2,597	2,597
Natural Gas	21,858	21,858	21,858	21,858	21,858
Biomass	334	334	334	334	334
Solar	345	931	1,083	1,083	1,083
Wind	850	1,221	1,221	1,221	1,221
Geothermal	0	0	0	0	0
Conventional Hydro	3,324	3,324	3,324	3,324	3,324
Run of River Hydro	418	418	418	418	418
Pumped Storage	1,411	1,411	1,411	1,411	1,411
Nuclear	3,326	3,326	3,326	3,326	3,326
Hybrid	0	0	0	0	0
Other	0	0	0	0	0
Battery	32	52	52	52	52
Unknown	0	0	0	0	0
Total MW	34,495	35,472	35,623	35,623	35,623

³⁹ NYISO’s 2025 Q3 STAR Report: <https://www.nyiso.com/documents/20142/16004172/2025-Q3-STAR-Report-Final.pdf>; Explanatory Statement: https://www.nyiso.com/documents/20142/54553125/03_2025Q3STAR_NearTermReliabilityNeedExplanatoryStatement.pdf; and Solutions Solicitation: <https://www.nyiso.com/documents/20142/15930765/STRP-Q3-2025-Solicitation-Letter-Final.pdf>

NPCC-New York Assessment

Planning Reserve Margins

The LTRA anticipated and prospective margins are above 15% for all 10 years. However, the system margins are narrowing throughout the assessment period. Wind, grid-connected solar, and run-of-river totals were derated for the LTRA calculation. Under its reliability planning processes, NYISO uses probabilistic assessments to evaluate its system’s resource adequacy against the LOLE resource adequacy criterion of no greater than 0.1 event-days/year probability of unplanned load loss. NYISO’s *2024 Reliability Needs Assessment*⁴⁰ found reliability margins decrease over time as load increases to the point that New York is nearly at the 0.1 even-days/year criteria by 2034.

NYISO also provides support to the New York State Reliability Council (NYSRC) in conducting an annual IRM study. This study determines the IRM for the upcoming capability year (May 1 through April 30). The IRM is used to quantify the capacity required to meet the Northeast Power Coordinating Council (NPCC) and NYSRC’s resource adequacy criterion of “one day in 10 years.” The current IRM for the 2025–2026 capability year is 24.4% of the forecasted NYCA peak load. All values in the IRM calculation are based upon full installed capacity values of resources. The IRM has varied historically from 15% to 24.4%. Additionally, NYISO performs an annual study to identify the Locational Minimum Installed Capacity Requirements (LCRs) for the upcoming capability year.

Energy Assessment, Including Non-Peak Hour Risk

New York State’s Climate Leadership and Community Protection Act (CLCPA) decarbonization mandates to decarbonize span all major industries and are the main drivers of change to the electric system NYISO staff in system operations, planning, and markets will continue to assess the system changes to prepare for the grid’s transformation.

With high penetration of renewable intermittent resources, the system will need dispatchable emission-free resources (DEFR) and long-duration resources to balance intermittent supply with demand. These types of resources must be significant in capacity and have attributes such as the ability to come on-line quickly, stay on-line for as long as needed, maintain the system’s balance and stability, and adapt to meet rapid, steep ramping needs. Additionally, although new transmission is being built, more investment is necessary to support the delivery of future offshore wind energy and to connect new resources upstate to downstate load centers where demand is greatest.

NYISO performs long-range assessments (10-year and beyond planning horizon), and certain energy aspects are accounted for in the hourly modeling and simulations performed under the resource

adequacy studies through NYISO’s reliability planning processes along with the production cost simulations performed under its System and Resource Outlook.

NYISO performs and supports energy assessments a fuel and energy security study, a study assessing potential impacts related to climate change, and weekly analysis of fuel and energy security based on load profiles and fuel inventories reported through NYISO’s Generator and Fuel Emissions Reporting (GFER) data portal. These assessments are based on data and information provided by resources on an annual, weekly, and as-needed basis considering system operating conditions. These assessments have the capability to analyze the impact of changes in stored fuel inventory, resource outages, fuel supply disruptions, transmission constraints, and other relevant conditions that may adversely impact fuel and energy security. Additionally, the New York City and Long Island areas have a loss of gas supply dual-fuel requirement, and certain combined-cycle gas units participate in a “Minimum Oil Burn” program. While oil accounts for a relatively small percentage of the total energy production in New York, it is often called during critical periods, such as when severe cold weather limits access to natural gas.

Probabilistic Assessments (NERC ProbA and Other Studies)

NYISO performs probabilistic assessments using GE’s Multi-Area Reliability Simulation (MARS) as part of its reliability planning processes, as well as supporting the calculation of the annual IRM, LCRs, and capacity accreditation. The new capacity accreditation market rules align compensation for capacity suppliers with an individual resource’s expected reliability benefit to consumers and uses the probabilistic models from the LCR process to define capacity accreditation factors (CAF) for various capacity accreditation resource classes. The CAFs will reflect the marginal reliability contribution of the ICAP suppliers within each capacity accreditation resource class toward meeting NYSRC resource adequacy requirements for the upcoming capability year, starting with the capability year that began in May 2024.

Additionally, every year, each Regional Entity (e.g., NPCC) provides results into NERC’s ProbA process under the LTRA. The results from the ProbA performed in 2025 by the NPCC Regional Entity are shown below.

ProbA Results

New York is a summer-peaking area with negligible risks as shown in the low values in the following table of annual metrics.

⁴⁰ <https://www.nyiso.com/documents/20142/2248793/2024-RNA-Report.pdf>

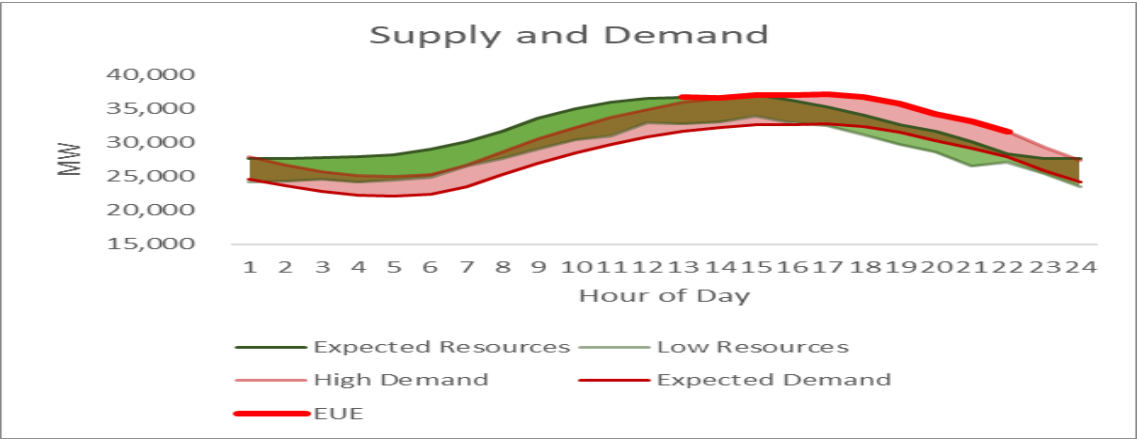
NPCC New York Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	1.909	0.466	12.478
NEUE (ppm)	0.012	0.003	0.078
LOLH (hours per Year)	0.011	0.002	0.035
* Provides the 2024 ProbA results for Comparison			

EUE Heat Maps – 2029

Negligible risk presented for Summer 2029, with occurrences clustered in July and August around hours 16 to 18.

Month	Hour																							
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	7%	24%	25%	7%	3%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	8%	16%	6%	1%	0%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Hourly demand and resource projections for the highest EUE day in 2029 are shown in the figure below.



Although expected resource contribution is great enough to meet expected demand, there is risk due to the variability in the higher net demand levels from LFU compounded with a greater risk added due to the variability in resource contribution. The higher net demand LFU levels could be 10–13% higher than expected, which could strain the system as modeled in the ProbA.

Demand

NYISO employs a multi-stage process to develop load forecasts for each of the 11 zones within the New York Control Area (NYCA). The impacts of net electricity consumption of energy storage resources due to charging and discharging are added to the energy forecasts, while the peak-reducing impacts of BTM energy storage resources are deducted from the peak forecasts.

Currently, the NYCA summer peak typically occurs in late afternoon. The NYCA summer peak is projected to shift into the evening as additional BTM solar is added to the system and as electric vehicle charging impacts increase during the evening hours. Because the hour of the summer peak shifts into the evening over the course of the forecast horizon, BTM solar generation becomes less coincident with the NYCA peak hour, and BTM solar coincident peak reductions are forecasted to decrease in later years. The forecast of solar PV-related reductions to the winter peak is zero because the system typically peaks after sunset.

Trended weather conditions from the Climate Impact Study Phase I report are included in NYISO’s end-use models and are reflected in the baseline, scenario, and percentile forecasts. NYISO develops 90th and 99th percentile forecasts to account for the impacts of extreme weather on seasonal peak demand and calculates 10th percentile forecasts to represent milder seasonal peak conditions.

The 10-year annual average energy (+1.7%) and summer peak demand (+1.0%) growth rates are similar to last year’s forecast. Throughout the 30-year forecast period, baseline energy and seasonal peak demand increase significantly due to New York State electrification and decarbonization policies, principally the CLCPA. The baseline forecast includes significant electrification via conversion to electric heating and electric non-weather sensitive appliances, along with significant growth in EV adoption. In the early forecast years, large-load projects add significant growth to the annual energy and peak demand forecasts. To account for forecast uncertainty during winter due to electrification and large loads, NYISO implemented a winter dynamic load forecast uncertainty in the resource adequacy models for its 2024 RNA.

Demand-Side Management

NYISO has been working on developing market concepts to encourage the participation of flexible load, which participation will become increasingly important as the levels of weather-dependent intermittent resources on New York’s grid increase in response to the state’s climate and clean energy

policies. New York utilities are piloting several load management programs (e.g., smart electric vehicle charging, home-thermostat use, and integration of BTM storage for local peak demand modulation). As part of NYISO’s annual long-term forecasting process, the impacts of these programs are discussed and significant impacts on demand are included in the load forecast.

For the 2025 LTRA, the DR participation for the summer capability period has increased slightly from 1,294 MW to 1,487 MW. These values are nameplate and are derated for reserve margin calculations. For example, the 1,487 MW is derated to 989 MW. There are currently 433 MW of DR participating in ancillary services programs (not included in reserve margin calculations) and providing either 10-minute spinning reserves or 30-minute non-synchronous reserves.

Distributed Energy Resources

In 2024, NYISO implemented a plan to integrate DERs, including DR resources, into its markets. The DER Participation Model project aims to enhance participation of DERs in the competitive wholesale markets. These measures closely align the bidding and performance measurements for DERs with the rules for generators. The measures establish a state-of-the-art model that is largely consistent with the market design envisioned by FERC in its Order 2222. This project, which began in 2017, provides a single-participation model for DER DR resources to provide energy, ancillary services, and installed capacity through an aggregation. The market rules for the DER and aggregation participation model were accepted by FERC in January 2020. NYISO filed additional proposed tariff revisions with FERC in June 2023 to clarify and enhance these market rules. NYISO deployed its DER participation model in 2024.

Generation

Significant new resource development will be required to achieve New York’s energy targets under the CLCPA. According to the [2023–2042 System and Resource Outlook](#) the total installed generation capacity to meet policy objectives within New York is projected to range between 111 GW and 124 GW by 2040. At least 95 GW of this capacity will consist of new generation projects and/or modifications to existing plants. Even with these additions, New York still may not be sufficient to maintain the reliable electricity supply and meet policy requirements within the next 20 years.

Currently, NYISO’s interconnection process⁴¹ contains a significant number of proposed projects in various stages of development with only a fraction in more advanced stages included in the reliability planning models. However, the grid will evolve to achieve the policy mandates, and those changes will affect the nature and amount of resources.

⁴¹ <https://www.nyiso.com/documents/20142/1407078/NYISO-Interconnection-Queue.xlsx>

Coordination of project additions and retirements is essential to maintaining reliability and achieving policy. The New York system relies on fossil-fuel, synchronous generation. ERSs usually provided to the system by synchronous fossil generation will remain necessary. As New York’s public policies seek to decarbonize the grid, fossil-fuel, synchronous generation will be needed for reliable power system operations until the capabilities it offers can be supplied by other resources. New technology is being developed to allow for a reliable transition to a clean grid. Grid-forming inverter capabilities, as well as DEFRs, will likely be part of this transformation.

On June 23, 2025,⁴² New York’s governor directed the New York Power Authority to develop and construct a zero-emission advanced nuclear power plant in upstate New York to support a reliable and affordable electric grid while providing the necessary zero-emission electricity to achieve a clean energy economy.

Energy Storage

Storage resources can help to fill in voids created by reduced output from renewable resources. However, sustained periods of reduced renewable generation can rapidly deplete storage capabilities. NYISO has implemented its Co-Located Storage Resources model to allow wind or solar resources that are interconnected with an energy storage resource the ability to participate in the markets while respecting a shared interconnection limitation. NYISO is preparing the implementation of a model for hybrid storage resources to allow multiple technologies at the same point of interconnection to participate in the market as a single resource. Additionally, the resource adequacy simulation tools (such as GE’s MARS) used in system planning by NYISO and for setting the IRMs were enhanced to include energy-limited resource models that allow for charging and discharging and also include temporal constraints (e.g., hours/days or hours/month).

Capacity Transfers

The models used for NYISO’s reliability planning studies include firm capacity transactions (purchases and sales) with its neighboring systems as a base-case assumption. Proposed projects that are in a more advanced stage are included. One such project is the 1,250 MW HVdc line from Québec to New York City, which is reflected in the LTRA summer total transfers starting in 2026. Additionally, the probabilistic model that NYISO uses to assess the adequacy of resources in the reliability planning processes employs several methods aimed at preventing overreliance on the external systems support. For example, NYISO limits emergency assistance from neighboring systems by modeling a total limit of 3,500 MW, modeling five simultaneous peak days, modeling the long-term purchases and sales with neighboring control areas, and not modeling emergency operating procedure steps for the neighboring systems.

⁴² <https://www.governor.ny.gov/news/governor-hochul-directs-new-york-power-authority-develop-zero-emission-advanced-nuclear-energy>

New York is fortunate to have strong interconnections with neighboring regions and has enjoyed reliability and economic benefits from such connections. As the energy policies in neighboring regions evolve, New York’s imports and exports of energy could vary significantly due to the resulting changes in neighboring systems. The availability of energy for interchange is predicted to shift fundamentally as policy achievement progresses. As New York’s and other regions’ grids evolve, continuous monitoring and collaboration with our neighboring systems will be required.

Transmission

Significant new transmission is being built across New York, but more investment is necessary to support, among other things, the delivery of offshore wind energy to connect new resources upstate to downstate load centers where demand is greatest.

Key transmission projects under development and accounted for in the reliability models include the following:

- The Northern New York Priority Transmission Project upgrading the transmission corridors from the renewable generation pocket in the north country to central New York
- The 1,250 MW Champlain-Hudson Power Express HVdc line from Hydro-Québec to New York City, and
- The transmission project selected to address the Long Island Offshore Wind Expert Public Policy Transmission Need and that adds three new ac tie lines and a 345 kV backbone across western/central Long Island with an in-service date in 2030
- Con Edison’s proposed Brooklyn Clean Energy Hub project, including a new 345 kV load-serving substation with the goal of addressing local electric reliability needs in the boroughs of Brooklyn and Queens as well as the goal of serving as a point of interconnection for new clean-energy resources

Additionally, there are significant transmission projects either recently selected or under study that have not yet met the criteria to be in the reliability model. For instance, the PSC recently identified a new public policy transmission planning need for NYISO to solicit proposed solutions and that is intended to support the integration of 4.7 GW of wind resources in New York City.

Furthermore, in 2020, the PSC ordered the New York utilities to undertake planning assessments and make investment proposals to facilitate the cost-effective development of renewable and emission-free resources while maintaining the reliability of New York’s electric grid. The Coordinated Grid Planning Process (CGPP) was approved by the PSC in August 2023. The process is designed to assess the state’s electric grid using a 20-year planning horizon. The CGPP is intended to identify electric grid expansions that can aid in unlocking renewable generation capacity and provide energy headroom for the purpose of meeting New York’s clean energy goals while providing value to customers. Moreover, the CGPP is designed to identify opportunities for expansion of the bulk transmission system to advance the mandates of CLCPA. This provides another opportunity to inform the PSC’s consideration of whether to establish a public policy transmission need for NYISO to solicit and evaluate proposed solutions.

Reliability Issues

NYISO’s *2024 Reliability Needs Assessment*⁴³ (RNA) and subsequent analysis⁴⁴ identified very tight transmission security margins in New York City (Zone J) by 2034. The narrowing of the reliability margin continues to be a major concern. Most recently, NYISO’s 2025 Quarter 3 STAR report⁴⁵ identified short-term reliability needs in New York City and Long Island due to generation deactivations.

The transition to a cleaner grid in New York is leading to an electric system that is increasingly dynamic, decentralized, and reliant on weather-dependent renewable generation and may lead to increasing reliability issues on the New York system. Reliability margins are shrinking. Generators needed for ERSs are planning to retire. Delays in the construction of new supply and transmission, higher-than-expected demand, and extreme weather could threaten reliability and resilience in the future. The system is projected to become winter-peaking in the next decade due to electrification and decarbonization policies. Large loads are being proposed to interconnect to the system. New York’s current reliance on neighboring systems is expected to continue through the next 10 years. A successful transition of the electric system requires replacing the reliability attributes of existing fossil-fueled generation with clean resources with similar capabilities. Such resources must be significant in capacity and have attributes such as the ability to come on-line quickly, stay on-line for as long as needed, maintain the system’s balance and stability, and adapt to meet rapid, steep ramping needs. New transmission is being built, but more investment is necessary to support the delivery of offshore wind energy to connect new resources located in upstate to downstate load centers where demand is greatest.

⁴³ <https://www.nyiso.com/documents/20142/2248793/2024-RNA-Report.pdf>
⁴⁴ https://www.nyiso.com/documents/20142/51270164/CRP_KeyTopics_TPAS_050625.pdf
⁴⁵ NYISO’s 2025 Q3 STAR Report: <https://www.nyiso.com/documents/20142/16004172/2025-Q3-STAR-Report-Final.pdf> and Explanatory Statement:

[https://www.nyiso.com/documents/20142/54553125/03_2025Q3STAR_NearTermReliabilityNeedExplanatoryStatement.p](https://www.nyiso.com/documents/20142/54553125/03_2025Q3STAR_NearTermReliabilityNeedExplanatoryStatement.pdf)
df; Solutions Solicitation: <https://www.nyiso.com/documents/20142/15930765/STRP-Q3-2025-Solicitation-Letter-Final.pdf>

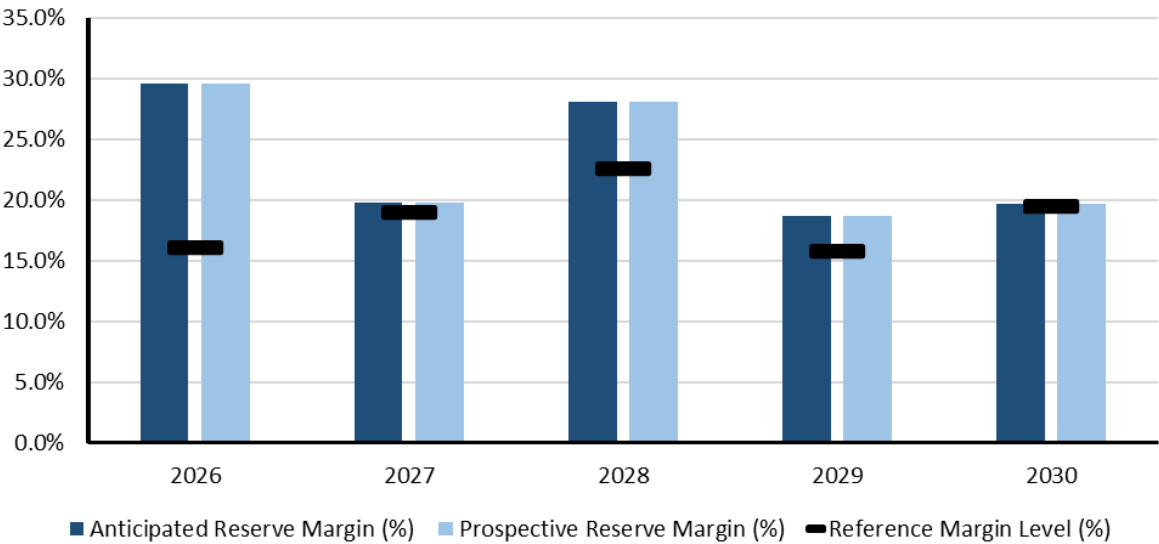


NPCC-Ontario

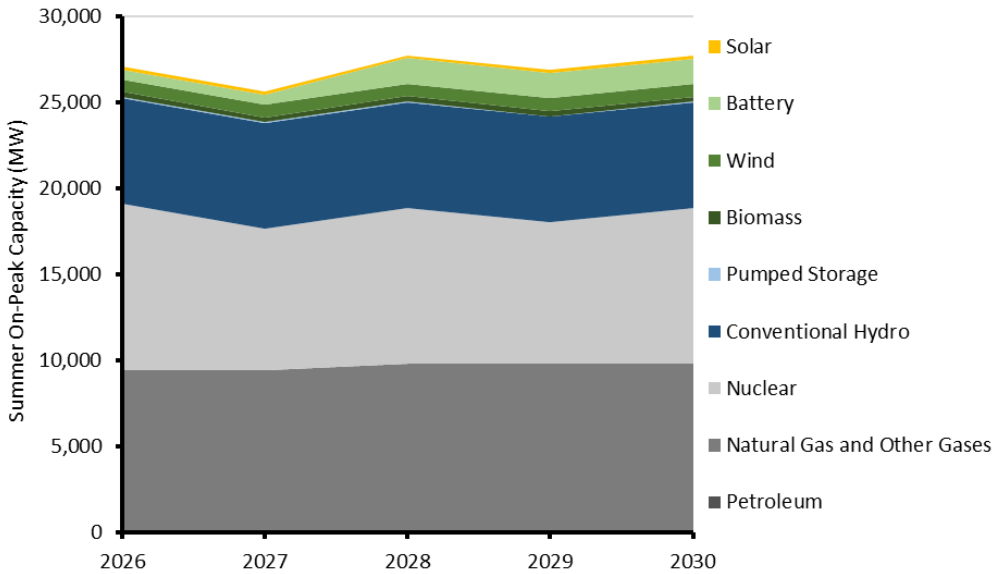
NPCC-Ontario is an assessment area that covers the Canadian province of Ontario. The province of Ontario covers more than 1 million square kilometers (415,000 square miles) and has a population of over 16 million people. The Independent Electricity System Operator (IESO) is the balancing authority for the province of Ontario. NPCC-Ontario is electrically interconnected with NPCC-Québec, MRO-Manitoba, MISO, and NPCC-New York. Peak electricity demand in NPCC-Ontario occurs during the summer season.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	23,403	24,023	24,514	25,587	26,443	26,927	27,747	28,621	29,202	29,974
Demand Response	2,046	1,998	2,090	2,092	2,093	2,095	2,096	2,098	2,099	2,101
Net Internal Demand	21,357	22,025	22,424	23,495	24,350	24,832	25,651	26,523	27,103	27,873
Additions: Tier 1	853	853	2,156	2,156	2,156	2,964	3,507	4,051	4,579	5,387
Additions: Tier 2	0	0	0	0	0	0	0	0	0	0
Additions: Tier 3	0	0	0	0	600	600	600	1,233	1,324	1,324
Net Firm Capacity Transfers	602	772	1,002	1,002	1,432	1,002	302	302	302	302
Existing-Certain and Net Firm Transfers	26,833	25,541	26,577	25,737	26,999	25,623	25,767	25,767	26,611	26,611
Anticipated Reserve Margin (%)	29.6%	19.8%	28.1%	18.7%	19.7%	15.1%	14.1%	12.4%	15.1%	14.8%
Prospective Reserve Margin (%)	29.6%	19.8%	28.1%	18.7%	19.7%	15.1%	14.1%	12.4%	15.1%	14.8%
Reference Margin Level (%)	16.1%	19.0%	22.6%	15.8%	19.5%	13.9%	14.7%	9.6%	14.3%	13.2%



Planning Reserve Margins



Existing and Tier 1 Resources

NPCC-Ontario Highlights

- Ontario’s ARMs remain above the RML for the first five years of the 2025 LTRA outlook. Only one year within the 10-year horizon shows a minor shortfall, which is mitigated through a combination of capacity swap agreements with Hydro-Québec and the expected contribution of Tier 3 resources, including those from the Long-Term 2 (LT2) procurement expected to be on-line in 2030.
- Ontario’s 2025 Annual Planning Outlook (APO) identified a growing energy gap beginning in 2029, with a more pronounced shortfall expected by 2035. This is primarily driven by expiring contracts, increasing demand from electrification, and the emergence of large industrial loads. Different to last year’s LTRA, the IESO assumes generation resources are expected to be re-contracted (through the IESO’s reacquisition mechanisms) after those contracts expire. This has improved the resource outlook for the IESO when compared to last year while aligning the methodology to forecast supply with the methodology used by other NERC assessment areas.
- For demand, Ontario projects compound annual growth rates of 2.37% for summer peak and 2.93% for winter peak over the 2026–2035 period. As a result, total internal demand is projected to grow by 31% over the next 10 years to nearly 30 GW by 2035.
- Ontario’s generation landscape is undergoing a significant transformation, driven by the integration of IBRs, expansion of energy storage, nuclear refurbishments, and new nuclear projects. Ontario’s planning assumptions now reflect a more realistic view of generator retirements, assuming continued operation unless explicitly declared otherwise. This aligns with two recently completed procurements to re-contract existing resources.
- Ontario is undergoing a significant expansion in energy storage capacity. As of April 2025, the Oneida battery storage facility (250 MW/1,000 MWh) entered commercial operation, marking a major milestone. By May 2028, Ontario expects over 2,700 MW (installed capacity) of BESS to come on-line, with discharge durations of four hours.
- Ontario is attentively monitoring reliability risks due to large industrial and commercial load additions, including data centers, EV production facilities, hydrogen electrolyzers, and electrified heating systems. These loads introduce uncertainty in peak and hourly demand forecasting and challenge transmission development. Additional reliability risks include nuclear refurbishment delays, aging infrastructure, supply chain constraints, and policy uncertainty. The IESO incorporates these risks into long-term planning by maintaining additional reserves and using probabilistic assessments.

NPCC-Ontario Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Petroleum	3	3	3	3	3
Natural Gas	9,385	9,385	9,790	9,790	9,790
Biomass	299	304	310	310	310
Solar	150	150	150	150	150
Wind	724	725	728	732	732
Conventional Hydro	6,163	6,163	6,163	6,163	6,163
Pumped Storage	38	38	38	38	38
Nuclear	9,724	8,256	9,059	8,214	9,047
Battery	597	597	1,489	1,489	1,489
Total MW	27,084	25,622	27,731	26,891	27,723

NPCC-Ontario Assessment

Planning Reserve Margins

Ontario’s ARMs remain above the RML for the first five years of the 2025 LTRA outlook. Only one year within the 10-year horizon shows a minor shortfall, which is mitigated through a combination of capacity swap agreements with Hydro-Québec and the expected contribution of Tier 3 resources, including those from the Long-Term 2 (LT2) procurement expected to be on-line in 2030. No Tier 2 resources have been identified for this year’s publication.

The IESO calculates Ontario’s reserve margin annually using the GE MARS model and applies a more stringent reserve criterion than the NPCC standard of 0.1 days/year LOLE, incorporating additional reserves to manage risks associated with nuclear refurbishments and new nuclear builds. For example, over the LTRA outlook, the 2025 Annual Planning Outlook (APO) includes reserves of nearly 800 MW in some summers and nearly 1,100 MW in some winters to account for uncertainties in nuclear project timelines. If these additional reserves were excluded, Ontario would meet or exceed the RML in all years of the assessment. MARS inputs include resource availability, outages, refurbishment schedules, interface limits, and demand uncertainty. The model uses probabilistic simulations and Monte Carlo analysis for wind and solar and historical data for hydro and thermal units. The assessment evaluates system adequacy across all hours, not just peak periods.

For the 2025 LTRA, the IESO applied NERC’s definitions for Tier 1 and Tier 3 resources. The IESO’s Resource Adequacy Framework (RAF) enables reacquisition of existing resources nearing contract expiry. It’s important to distinguish between off-contract resources and those that have reached end of life or retired. Many existing Ontario resources remain operational and can be upgraded or re-contracted, with the RAF providing competitive mechanisms to secure capacity from these resources. The 2025 LTRA assesses reliability independent of contractual status, unlike the 2025 APO, which aims to determine the resource adequacy needs in order to inform future reacquisitions of existing and new resources. As a result, the 2025 LTRA outlook will differ from the 2025 APO, especially regarding off-contract resources that are likely to continue to be operational.

The RAF remains unchanged since the 2024 LTRA and continues to guide the reacquisition of existing resources and the procurement of new capacity. The RAF supports a flexible, multi-pronged approach to resource adequacy, including capacity auctions, medium- and long-term procurements, and targeted programs for re-contracting or upgrading existing facilities and securing new resources.

Non-Peak Hour Risk, Energy Assurance, Probabilistic-Based Assessments

Ontario conducts annual energy adequacy assessments using Energy Exemplar’s Plexos software, which models the province’s nodal transmission network and simulates dispatch under expected

system conditions. These deterministic assessments evaluate energy sufficiency over a 20-plus-year horizon and are supplemented by sensitivity analyses to identify periods of heightened risk.

The 2025 APO identified a growing energy gap beginning in 2029, with a more pronounced shortfall expected by 2035. This is primarily driven by expiring contracts, increasing demand from electrification, and the emergence of large industrial loads. It should be reinforced that the APO presents an energy adequacy assessment used to inform future procurements, whereas the LTRA’s purpose is to inform reliability of the system, where contractual end dates are not incorporated into the assessment

Shorter-term energy assessments are conducted quarterly through the Reliability Outlook (RO), which evaluates energy adequacy over an 18-month horizon. These assessments use probabilistic demand forecasts and outage data to identify seasonal and weekly risks. While the RO time frame is too short to secure new resources, the IESO uses operational tools such as capacity auctions, coordination with market participants on outage scheduling, and DR programs to mitigate risks.

Ontario’s energy adequacy assessments do not assume economic imports or exports, reflecting a self-sufficiency planning approach. However, in practice, intertie capacity and capacity-sharing agreements (e.g., with Hydro-Québec) provide additional flexibility during periods of stress.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	0.043	0.001	0.066
NEUE (ppm)	0.000	0.000	0.000
LOLH (hours per Year)	0.000	0.000	0.000
*Provides the 2024 ProbA Results for Comparison			

Demand

Ontario’s demand forecast is shaped by a combination of econometric modeling for the near-term and sectoral/end-use modeling for the long term. The 2025 APO projects compound annual growth rates of 2.37% for summer peak and 2.93% for winter peak over the 2026–2035 period. Growth projections in the 2024 LTRA were 2.34% for summer and 2.75% for winter. Marginal increases in demand growth since the 2024 LTRA are attributed to data center growth and EV production. Incremental 2025 APO forecasted growth is driven by the following:

- Electrification of buildings, transportation, and industry
- Expansion of electric vehicle (EV) production and supply chains

- Rapid development of commercial data centers
- Population growth and household formation

Offsetting factors include increased EE, DSM programs, and a plateau in agricultural greenhouse expansion.

The 2025 APO forecasted Ontario to become a dual-peaking jurisdiction by 2030, with winter and summer peaks converging due to increased electrification of heating. The IESO’s demand forecast incorporates updated assumptions on immigration, economic growth, and sector-specific developments, including hydrogen production, steel decarbonization, and data center expansion. Additional large loads in planning but not yet included in the forecast are assessed based on their development stage, funding, and likelihood of materialization.

Ontario anticipates significant changes in load behavior, including increased demand from building electrification, EV charging (shifting peaks), data centers, hydrogen electrolyzers, and large industrial loads. These trends introduce variability and new reliability challenges. The IESO conducts [System Impact Assessments \(SIA\)](#) for large loads, evaluating impacts such as voltage flicker and transient stability. Enhancements to the assessment process are underway. Additionally, annual regulation needs assessments project up to 110 MW of incremental regulation by 2035 to manage fluctuating loads, with procurement strategies in place to meet these needs.

Demand-Side Management

The IESO has implemented a capacity qualification process that applies performance-based derates to DR resources, ensuring more reliable capacity contributions. Since the 2024 LTRA, the [Peak Perks program](#) has expanded to small businesses, helping the program deliver more than 152 MW of summer peak demand reduction in 2024, growing to over 200 MW in 2025. A new DR program targeting HVAC loads in the commercial and institutional sector is in development. These programs, as well as the [Industrial Conservation Initiative \(ICI\)](#), also contribute to peak demand reduction. A new electric demand side management (eDSM) framework spanning the next 12 years commenced with a \$1.8 billion budget for years 2025–2027 targeting 4.6 TWh of energy savings and 900 MW of peak demand savings.

Distributed Energy Resources

Ontario’s DER landscape includes both contracted embedded generation and uncontracted BTM resources. In 2024, contracted DERs totaled over 3,400 MW, with about 60% from solar, 20% from wind, and 15% from hydro and biomass. Uncontracted DERs contributed an estimated 2.7 TWh of energy.

DERs are integrated into planning through the [Enabling Resources Program \(ERP\)](#), which is developing participation models for standalone DERs, hybrid resources, and aggregations. The IESO is also advancing coordination protocols through the Transmission-Distribution Coordination Working Group (TDWG), which has proposed tools for real-time coordination and visibility. The group wrapped up work during Summer 2025 and has posted final reports on their findings.

DERs are considered in transmission planning as non-wires alternatives and are increasingly included in regional planning processes. The IESO’s [DER Potential Study](#) and Local Generation Program aim to further integrate DERs into Ontario’s RAF.

Generation

Ontario’s generation landscape is undergoing a significant transformation, driven by the integration of IBRs, expansion of energy storage, nuclear refurbishments, and new nuclear projects. To maintain system reliability, the IESO continues to monitor key operational parameters such as primary frequency response and system inertia, both of which are currently sufficient but require reassessment as the resource mix evolves. Ramping needs can be provided by over 11,100 MW of natural gas generation with 600 MW able to be online and ramp within 20 minutes. Supply to the majority of Ontario’s gas fleet is robust and supported by significant firm supply and transportation contracts. The IESO does not expect any material gas supply or delivery issues under extreme winter conditions. The day-ahead market, established through the IESO’s [Market Renewal’s](#) Program, allows for firm gas supply to be scheduled.

Deliverability testing is a core component of Ontario’s long-term procurement process, ensuring that new resources can connect without causing congestion or reliability issues. For the IESO’s second long-term procurement, testing will be expanded to include inverter-based resource screening for sub-synchronous control interactions.

Ontario has updated its Market Rules to align with IEEE 2800 and now requires synchrophasor data from generators and transmitters to improve situational awareness and IBR performance. The IESO is also conducting system-wide electromagnetic transient (EMT) studies and validating models for battery storage projects to proactively address sub-synchronous control interaction risks.

For Ontario’s adequacy assessments, capacity contribution values for thermal resources are calculated using historical performance and probabilistic modeling. Wind and solar contributions are based on seasonal capacity factors, while hydroelectric values are derived from historical output. Energy storage contributions are based on a four-hour discharge duration.

Ontario’s planning assumptions now reflect a more realistic view of generator retirements, assuming continued operation unless explicitly declared otherwise. This aligns with two recently completed medium-term procurements, which re-contracted existing resources for five-year terms. In addition to medium-term procurements, the IESO also maintains mechanisms such as Reliability Must Run agreements and capacity auctions to mitigate retirement risks. The IESO is currently conducting assessments for operating reserve and frequency response for the next 10 years, intended to be included in the 2026 APO.

Overall, Ontario’s generation planning is increasingly focused on flexibility, resilience, and integration of emerging technologies, with a strong emphasis on ensuring deliverability, maintaining operability, and adapting to evolving reliability challenges.

Energy Storage

Ontario is undergoing a significant expansion in energy storage capacity. As of April 2025, the Oneida battery storage facility (250 MW/1,000 MWh) entered commercial operation, marking a major milestone. By May 2028, Ontario expects over 2,700 MW of new BESS to come on-line, with discharge durations of four hours. These resources were secured through the Expedited Long-Term 1 (E-LT1) and LT1 procurements.

New storage projects may also participate in the second long-term procurement and long-lead time procurement, which aim to support system reliability during periods of high demand and low renewable output, particularly in the 2029–2035 time frame.

Energy storage resources are currently modeled as generators and loads at the same location, which presents operational challenges. The IESO is working to enhance its market tools and participation models through the ERP, which includes co-located and hybrid resource integration. Storage resources are also being incorporated into resource adequacy assessments using GE MARS software, which optimizes dispatch and accounts for energy reservoir size.

While operational experience with transmission-connected storage is still limited, the IESO is actively monitoring performance and refining planning assumptions. The integration of nearly 3 GW of new storage capacity over the next four years is expected to significantly improve Ontario’s ability to manage variability and meet ramping needs.

Capacity Transfers

Ontario maintains robust intertie connections with neighboring jurisdictions, including Québec, New York, Michigan, Manitoba, and Minnesota. These interconnections play a critical role in supporting reliability, particularly during peak demand periods and resource shortfalls.

Two key capacity swap agreements with Hydro-Québec provide Ontario with firm summer capacity. The [2016 agreement](#) allows for a 500 MW swap, while the [2024 agreement](#) enables a 600 MW per year exchange over a seven-year period. These agreements are designed to be flexible, allowing Ontario to bank capacity and use it in future summers as needed.

Ontario’s planning assessments assume self-sufficiency for the purpose of reserve margin calculations. However, in practice, these intertie agreements provide a valuable reliability backstop. The IESO coordinates closely with Hydro-Québec to align assumptions and ensure deliverability across the interties.

The refurbishment of Pickering NGS as well as new small modular reactors (SMR) scheduled to come on-line in the 2030s necessitated the review of flows across the province to maintain reliable operations. As a result, several new transmission projects have been proposed.

The IESO also participates in regional and interregional transmission planning processes, including NPCC area Transmission reviews and NERC planning assessments. These reviews ensure that Ontario’s transmission system can support capacity transfers and maintain reliability under a range of scenarios.

Firm capacity transfers have appeared to increase in this LTRA publication compared to 2024 due to a review of NERCs definitions, allowing modeled and coordinated capacity to be treated as firm. This process aligns with the IESO’s internal studies.

Transmission

Ontario is undertaking a significant expansion of its transmission system to support growing demand, resource integration, and system reliability. Key projects include the Waasigan Transmission Line, Etobicoke Greenway, and Flow East Towards Toronto (FETT) upgrade, which will collectively enhance capacity and resilience across the province. Additional reinforcements in London, Windsor-Essex, and northeastern Ontario address regional growth and industrial development. Voltage support devices, such as shunt reactors and STATCOMs, are being deployed to manage high voltages and support new transmission lines.

Transmission planning studies have identified constrained areas, particularly in the Greater Toronto Area (GTA), Essa (Barrie area), and eastern Ontario. These constraints are being addressed through the South and Central Ontario Bulk Plan and corridor studies to secure future transmission routes.

The IESO is also planning a new 500 kV double-circuit transmission line from Bowmanville to Toronto to support the connection of SMRs at Darlington NGS. This line is expected to be in service by the early 2030s.

To streamline transmission development and integrate Tier 2 resource deliverability insights, the IESO is designing a [Transmitter Selection Framework \(TSF\)](#) and enhancing its evaluation of non-wires alternatives (NWA). These initiatives aim to accelerate project delivery and improve coordination among stakeholders.

Reliability Issues

Ontario is attentively monitoring reliability risks due to large industrial and commercial load additions, including data centers, EV production facilities, hydrogen electrolyzers, and electrified heating systems. These loads introduce uncertainty in peak and hourly demand forecasting and challenge transmission development. The IESO is actively monitoring these trends and has published technical papers to better understand their implications. SIAs are conducted for large loads to evaluate impacts on voltage, stability, and power quality, with future enhancements planned to address sub-synchronous oscillation and ramp rate concerns.

Interdependencies with critical infrastructure sectors—such as natural gas, telecommunications, and transportation—are also being assessed. Ontario’s gas supply is considered robust, with most generators located near the Dawn storage hub and supported by firm contracts. Dual-fuel capabilities of some generators and coordination protocols with gas pipeline operators further mitigate risks during extreme weather. The IESO’s Market Renewal Program enhances gas-electric coordination through improved day-ahead scheduling.

Additional reliability risks include nuclear refurbishment delays, aging infrastructure, supply chain constraints, and policy uncertainty. The IESO incorporates these risks into long-term planning by maintaining additional reserves and using probabilistic assessments. Emerging technologies like battery storage and SMRs also present integration challenges. To address these, Ontario’s planning processes prioritize flexibility, resilience, and proactive mitigation strategies, including outage planning that accounts for extreme weather scenarios.

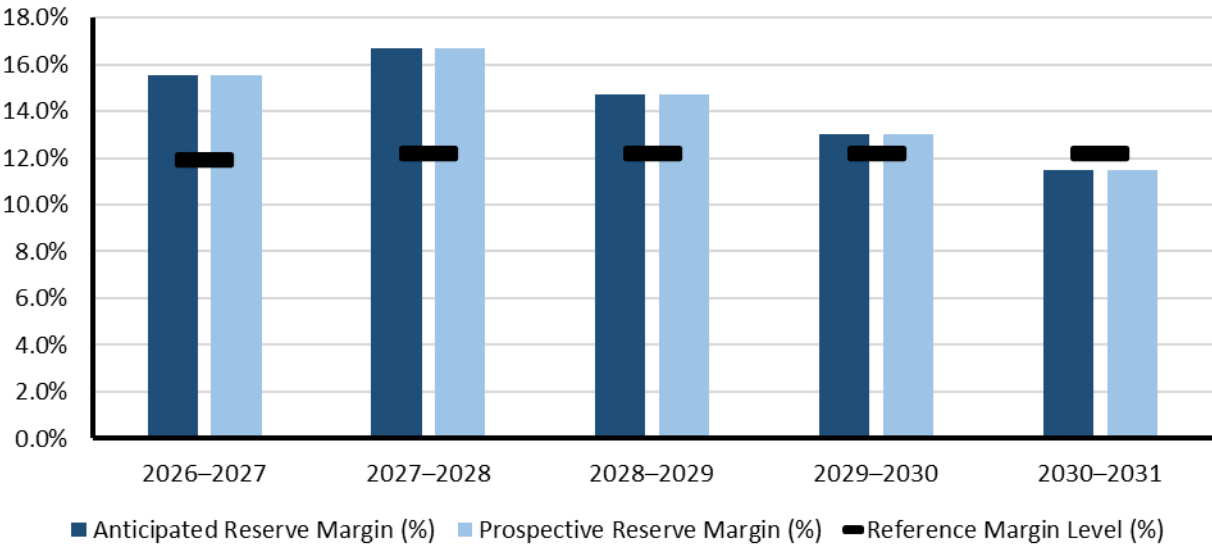


NPCC-Québec

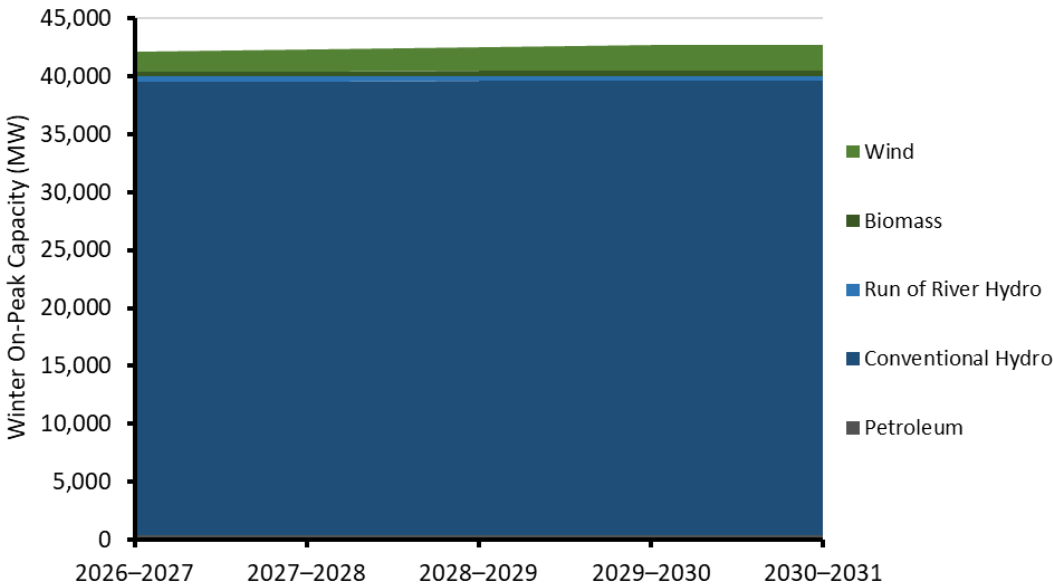
NPCC-Québec is an assessment area that covers the Canadian province of Québec. The province of Québec covers over 1.5 million square kilometers (nearly 600,000 square miles) and has a population of nearly 9 million people. Hydro-Québec is the BA for the province of Québec. The Québec BPS is one of the four electric Interconnections in North America. It is a predominantly hydroelectric-generation-based system that is electrically interconnected with NPCC-Ontario, NPCC-New York, NPCC-New England, and NPCC-Maritimes. Peak electricity demand in NPCC-Québec occurs during the winter season.

Demand, Resources, and Reserve Margins

Quantity	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2031–2032	2032–2033	2033–2034	2034–2035	2035–2036
Total Internal Demand	41,405	41,901	42,833	43,635	44,392	45,116	46,053	47,148	48,164	49,613
Demand Response	5,058	5,224	5,367	5,445	5,533	5,587	5,618	5,606	5,562	5,562
Net Internal Demand	36,347	36,677	37,465	38,191	38,859	39,529	40,435	41,542	42,602	44,051
Additions: Tier 1	412	566	710	891	891	891	891	891	891	891
Additions: Tier 2	0	0	0	0	0	0	0	0	0	0
Additions: Tier 3	0	0	0	0	0	0	0	0	0	0
Net Firm Capacity Transfers	-145	455	455	455	600	0	0	0	0	0
Existing-Certain and Net Firm Transfers	41,591	42,231	42,269	42,272	42,421	41,825	41,830	41,834	41,838	41,842
Anticipated Reserve Margin (%)	15.6%	16.7%	14.7%	13.0%	11.5%	8.1%	5.7%	2.9%	0.3%	-3.0%
Prospective Reserve Margin (%)	15.6%	16.7%	14.7%	13.0%	11.5%	8.1%	5.7%	2.9%	0.3%	-3.0%
Reference Margin Level (%)	11.9%	12.2%	12.2%	12.2%	12.2%	12.2%	12.2%	12.2%	12.2%	12.2%



Planning Reserve Margins



Existing and Tier 1 Resources

NPCC-Québec Highlights

- ARMs remain above the RML for the first four years of the assessment period.
- Over 4,000 MW of new wind installed capacity is expected to be in service by 2030, with additional wind projects in development.
- Hydro-Québec’s Action Plan 2035 and a memorandum of understanding with Newfoundland and Labrador outline major new capacity additions, including hydro upgrades, new large hydro power plants, wind and solar development, and potential battery storage and gas-fired generation. These projects are not included in Tier 1–3 categories in the present assessment due to their early development stage or ongoing stakeholder consultations but are expected to be incorporated gradually into future assessments.
- Major transmission projects, including the Appalachés–Maine (NECEC) and Hertel–New York (CHPE) interconnections, are expected to be in service by the end of 2025 and May 2026, respectively.

NPCC-Québec Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031
Petroleum	429	429	429	429	429
Biomass	405	405	405	405	405
Wind ⁴⁶	1,778	1,931	2,076	2,257	2,257
Conventional Hydro	39,091	39,129	39,167	39,170	39,175
Run of River Hydro	445	447	447	447	447
Total MW	42,148	42,342	42,524	42,708	42,712

⁴⁶ Expected at-peak capacity.

NPCC-Québec Assessment

Planning Reserve Margins

ARMs remain above the RML for the first five winters of the assessment period (2025–26 to 2029–30), supported by existing and anticipated capacity and firm imports. Margins fall below the RML starting in 2030–31 due to sustained demand growth from electrification. Several large-scale projects are under development but are not included in the reserve margin calculation due to their early-stage status. The RML is based on the 2024 NPCC Interim Review of Resource Adequacy and accounts for weather and economic uncertainty, generator outages, and DR constraints.

The assumptions used for this assessment, including demand forecast and resources, are consistent with the Hydro-Québec 2024 Supply Plan update, which was filed with the Régie de l’énergie on November 1, 2024, and the 2024 Québec Interim Review of Resource Adequacy filed with the NPCC in December 2024.

Over 90% of Québec’s installed capacity comes from large hydroelectric reservoirs, enabling flexible and reliable energy delivery. The system is designed to withstand multi-year droughts, with planning criteria requiring sufficient reserves to cover inflow deficits of 64 TWh over two years and 98 TWh over four years. No off-peak or seasonal energy risks have been identified.

Non-Peak Hour Risk, Energy Assurance, Probabilistic-Based Assessments

Québec is a winter-peaking area. There were no significant LOLH or EUE estimated for Winter 2027–2028. For Winter 2029–2030, the EUE is 62.99 MWh with an expected LOLE of 0.106 hours per year.⁴⁷

ProbA Summary of Results			
	2026*	2027-2028	2029-2030
EUE (MWh)	8.205	0.01	62.99
NEUE (ppm)	0.040	0.000	0.29
LOLH (hours per Year)	0.014	0.000	0.11
*Provides the 2024 ProbA Results for Comparison			

Demand

Québec’s demand forecast is driven by electrification of transportation, industrial decarbonization, and electric heating. New sectors such as hydrogen production, battery manufacturing, and data

centers are also contributing to demand growth. Forecasts are developed using sector-level modeling and include high and low scenarios to reflect uncertainty.

Demand-Side Management

Hydro-Québec operates a broad portfolio of DR programs, including interruptible load contracts for industrial and commercial customers, and smart heating and dynamic pricing for residential users. These programs are expected to provide 5,600 MW of peak reduction by 2034–2035. Reported capacities reflect actual observed reductions during events. EE and conservation programs are integrated into demand forecasts.

Distributed Energy Resources

BTM solar PV is expected to reach 705 MW by 2035. However, due to Québec’s winter-peaking profile, the on-peak contribution of DERs remains below 5 MW. No operational impacts are expected, and no DER aggregators are currently active in the area.

Generation

4,000 MW of wind installed capacity is under development or construction, including the Apuiat project (204 MW), three 400 MW phases of Des Neiges, and two procurement rounds totaling 2,700 MW. Hydro-Québec is also pursuing:

- Up to 2,000 MW from hydro unit upgrades;
- 5,000 MW of wind installed capacity through new community partnerships;
- 3,440 MW from Churchill Falls upgrades and the Gull Island project;
- 3,000 MW of solar installed capacity by 2035, including 300 MW of front-of-the-meter PV by 2029;
- Potential battery storage and natural gas generation.

Except for the 4,000 MW of wind capacity in construction, these projects are not included in the Tier 1–3 categories due to their early development stage or ongoing stakeholder consultations.

Energy Storage

No energy storage resources are currently planned for commissioning during the assessment period.

⁴⁷ 2025 Probabilistic Assessment results cover the period from March of the first year to February of the second year.

Capacity Transfers

Québec maintains firm seasonal capacity exchange agreements with Ontario (600 MW imports in winter, exports in summer). Québec has several firm capacity export agreements during the summer season.

Transmission

Hydro-Québec plans to add 5,000 km of new transmission lines and several major substations by 2035 to support regional development and renewable integration. Key projects include the following:

- NECEC (1,200 MW to Maine) – expected in service by December 2025
- CHPE (1,250 MW to New York) – expected in service by May 2026
- Three new 735 or 315 kV corridors in Québec
- Jean-Jacques-Archambault substation – planned for 2029

No long-term transmission constraints have been identified.

Reliability Issues

Large industrial loads are screened and approved by the Québec government and Hydro-Québec based on available supply. A moratorium is in place for new blockchain clients. The system’s winter peak is primarily driven by residential heating, and industrial additions are not expected to significantly affect peak uncertainty. To mitigate the impact of rising demand, Hydro-Québec is expanding its DSM programs and studying multiple new generation projects. In addition, Québec’s large hydro reservoirs provide strong protection against the impacts of drought. The system is planned to meet a regulatory energy reliability criterion requiring sufficient reserves to withstand inflow deficits of 64 TWh over two years and 98 TWh over four years.

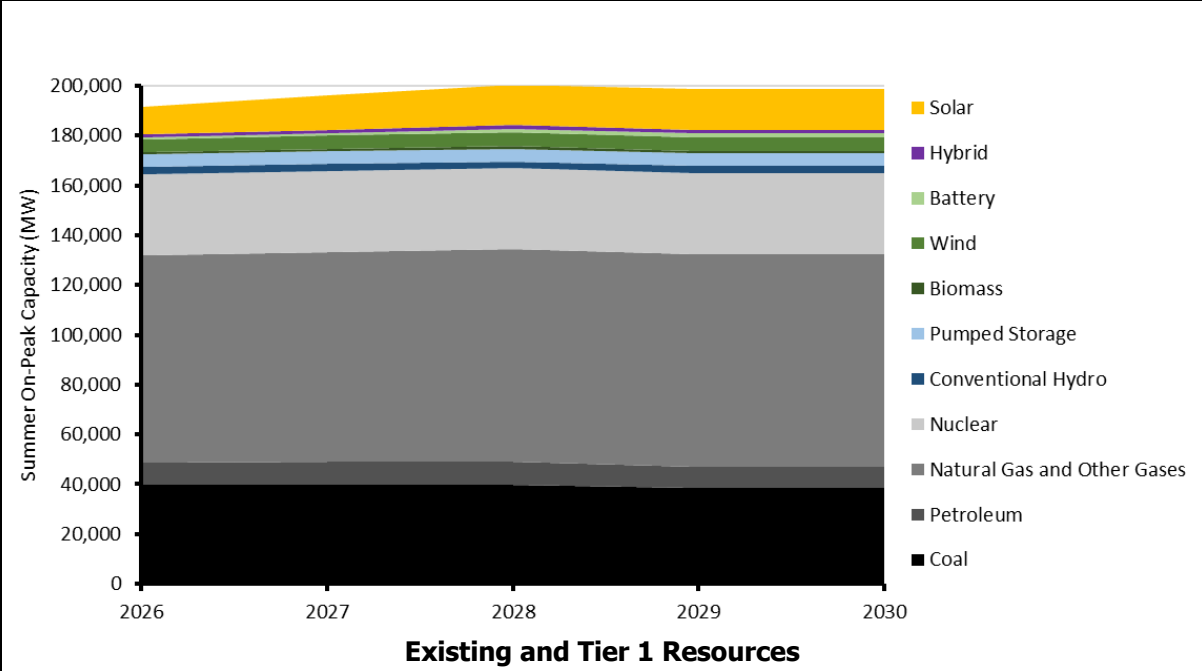
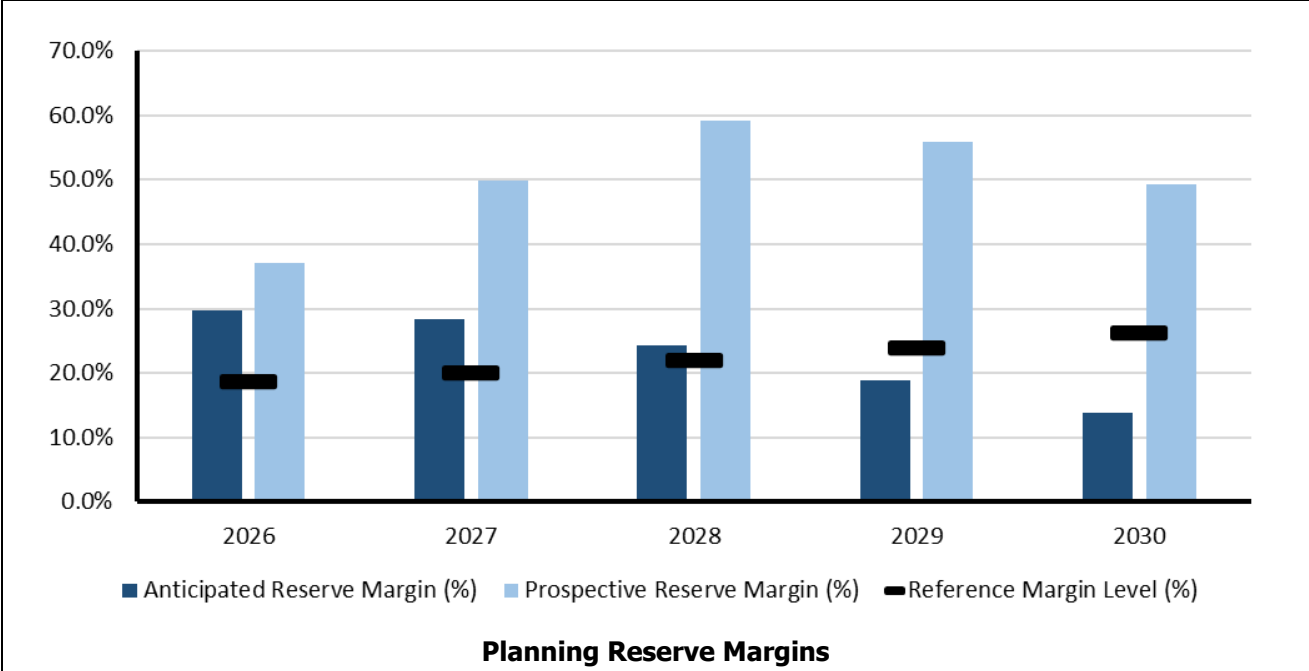


PJM

PJM Interconnection is a regional transmission organization that coordinates the movement of wholesale electricity in all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and the District of Columbia. PJM’s footprint covers approximately 369,054 square miles and has an approximate population of 67 million people. PJM is the area’s BA, Transmission and Resource Planner, Interchange Authority, Transmission Operator, Transmission Service Provider, and Reliability Coordinator. PJM is electrically interconnected with MISO, NPCC-New York, SERC-Central, and SERC-East. Peak electricity demand in PJM occurs during the summer season.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	158,937	164,186	169,981	176,094	183,883	192,647	200,507	204,197	207,253	209,923
Demand Response	8,184	8,439	8,703	9,002	9,398	9,845	10,250	10,409	10,533	10,629
Net Internal Demand	150,753	155,747	161,278	167,092	174,485	182,802	190,257	193,788	196,720	199,294
Additions: Tier 1	5,861	10,177	14,521	14,709	14,709	14,709	14,709	14,709	14,709	14,709
Additions: Tier 2	12,410	38,519	65,315	71,119	75,116	75,290	77,655	77,655	77,655	77,655
Additions: Tier 3	0	0	0	0	0	0	0	0	0	0
Net Firm Capacity Transfers	3,840	3,818	0	0	0	0	0	0	0	0
Existing-Certain and Net Firm Transfers	189,693	189,644	186,005	184,030	184,030	184,030	184,030	184,030	184,030	184,030
Anticipated Reserve Margin (%)	29.7%	28.3%	24.3%	18.9%	13.9%	8.7%	4.5%	2.6%	1.0%	-0.3%
Prospective Reserve Margin (%)	37.0%	49.9%	59.1%	55.9%	49.3%	42.6%	27.7%	25.4%	23.5%	20.0%
Reference Margin Level (%)	18.6%	20.1%	21.9%	23.9%	26.3%	28.9%	30.8%	33.0%	35.1%	35.1%



PJM Highlights

- Load forecasts have increased year over year due to data center and economic growth as well as increased electrification in the PJM footprint.
- Available generation capacity has decreased due to retirements and delays in new additions to the fleet.
- Based on the load increase and generation decrease, PJM is projecting potential reserve margin shortages during peak operating periods. As a result, there is an increased risk that emergency procedures may be required to meet load and reserve requirements.
- PJM will be heavily reliant on good generation performance from both fossil and inverter-based generation to avoid/minimize the need for emergency procedures.

PJM Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	39,866	39,866	39,866	38,288	38,288
Coal*	39,866	37,738	27,448	28,002	26,464
Petroleum	8,952	9,163	9,163	8,766	8,766
Natural Gas	83,210	84,150	85,385	85,385	85,385
Natural Gas*	82,589	83,443	84,678	84,678	84,678
Biomass	857	907	907	907	907
Solar	11,282	13,616	16,141	16,328	16,328
Wind	5,251	5,496	5,622	5,622	5,622
Conventional Hydro	2,807	2,829	2,829	2,829	2,829
Pumped Storage	5,068	5,068	5,068	5,068	5,068
Nuclear	32,508	32,508	32,508	32,508	32,508
Hybrid	1,187	1,504	1,504	1,504	1,504
Battery	703	895	1,531	1,531	1,531
Total MW	191,712	196,002	200,524	198,737	198,737
Total MW*	191,091	193,166	187,399	187,743	186,205
*Capacity with additional generator retirements. Generators that are forecasted to retire by PJM are removed from the resource projection where marked.					

PJM Assessment

Planning Reserve Margins

The PJM ARM falls below the Installed Reserve Requirement (RML) in 2029 when the ARM dips just below 19% as the RML reaches 24%.

- Accelerated retirements, driven by unit age and environmental public policy, of generators that provide necessary attributes needed to maintain reliability are outpacing new, mainly IBR additions. PJM received over 30 deactivation notifications totaling over 2 GW in 2024.
- Approximately 40% of new interconnection requests to the PJM grid are solar resources.

PJM faces an extreme and rapid tightening of supply and demand for capacity resources in the near term and needs additional resources to rapidly address its near-term reliability challenges.

PJM is in a transition year as the determination is based on the Reserve Requirement Study (RRS) and Effective Load Carrying Capability (ELCC) Study via PJM Manual 20A Resource Adequacy Analysis.⁴⁸

Non-Peak Hour Risk, Energy Assurance, Probabilistic-Based Assessments

Based on the load increase and generation decrease, PJM is projecting a potential reserve margin shortages during peak operating periods. As a result, there is an increased risk that emergency procedures may be required to meet load and reserve requirements.

PJM will be heavily reliant on good generation performance from both fossil and inverter-based generation to avoid or minimize the need for such emergency procedures. The greatest risk is still during the summer peak period.

Probabilistic Assessments (NERC ProbA and Other Studies)

LOLH and EUE values for 2027 are 0.61 hours/year and 3,251 MWh/year, respectively, which are values consistent with PJM having a 2027 LOLE slightly worse than the 1 day in 10-year target. For 2029, the metrics significantly increase (LOLH = 9.97 hours/year and EUE = 67,581 MWh/year) due to significant forecasted peak load increases (i.e., more than 12,000 MW in summer and more than 14,000 MW in winter, driven by large load additions in the PJM footprint) and the changing resource portfolio mix (i.e., the retirement of thermal resources and the addition of wind, solar and storage, that do not provide an expected commensurate resource adequacy value when compared to the retired thermal resources).

In both studied years, large shares of the annual EUE and LOLH are concentrated in the winter months (especially January). In such winter days, the loss-of-load events identified by the model are driven by low temperatures, which result in high loads and the potential for high correlated outages from gas resources as well as poor performance from solar resources. These winter events tend to occur during both morning and evening peaks.

The smaller shares of EUE and LOLH observed in the summer period for 2027 and 2029 are driven by events in the evening (hours ending 19 and 20), during days with high temperature, high loads, and declining performance of BTM and front-of-the-meter solar resources, low performance of wind resources, and to a lesser extent by slightly worse performance of thermal resources.

The ProbA results differ from the LTRA results in that the ProbA models the following:

- Fewer additions: Resources that are identified as Tier 1 in the LTRA may not reach the in-service status on their targeted in-service date.
- More retirements: The current number of announced retirements does not reflect all the environmental policies that states in the PJM footprint are targeting for future years.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	538	3,251	67,580
NEUE (ppm)	0.00	3.50	65.50
LOLH (hours per Year)	0.11	0.61	9.97
* Provides the 2024 ProbA Results for Comparison			

Demand

The demand for electricity is growing at the fastest pace in years, primarily from the proliferation of data centers, electrification of buildings and vehicles, and manufacturing.

PJM expects its summer peak to climb by 55,779 MW to 209,923 MW in 2035, while winter peaks are expected to grow by 62,048 MW to reach 198,175 MW by winter 2034–35.

Sector models are a key part of the load forecast process, providing insights into why load trends are happening. Sector models also incorporate the independent assumptions on economic trends and

⁴⁸ <https://www.pjm.com/-/media/DotCom/documents/manuals/m20a.pdf>

end-use adoption and efficiency. The PJM load forecast process considers three sectors: residential, commercial, and industrial. Each sector has its own set of models and inputs.

The load forecast is constructed using 24 hourly models for each zone. In each model, load is the dependent variable. In the history, we start with metered load and then re-constitute with load management addbacks, load drops associated with peak shaving programs, load related to load adjustments (where applicable), and distributed solar generation estimates.

PJM’s projected load indicators in many instances have doubled from the 2024 LTRA projections. For example, net energy for load growth for PJM is projected to average 4.8%, up from 2.3% in last year’s projections, per year over the next 10-year period and 2.9% over the next 20 years. Total PJM energy is forecasted to be 1,328,045 GWh in 2035, a 10-year increase of 495,264 GWh, and reaches 1,482,068 GWh in 2045, a 20-year increase of 649,287 GWh. Annualized 10-year growth rates for individual zones range from 0.2% to 8.4% with a median of 1.6%.

Demand-Side Management

As in past years, DR resources can participate in all PJM markets—capacity, energy, and ancillary services. DR is forecast to grow during the summer peak season from 8,184 MW in 2026 to 10,629 MW in 2035. PJM’s probabilistic resource adequacy modeling accounts for observed DR availability variations by season and hour.

Distributed Energy Resources

PJM expects 4,810 MW of solar DERs at the time of summer peak demand in 2030 and 5,165 MW in 2035. The effects of solar DERs are included in the load forecast for PJM. No effect of solar DERs is incorporated in the winter load forecast since winter expected peak occurs after sundown.

PJM also expects 3,652 MW of contributions from plug-in EVs to load at the time of summer peak demand in 2030 and 8,250 MW in 2035, with additional contributions from distributed battery storage ranging from 300–900 MW over the same five-year period.

The net effect of DERs is included in the load forecast as the models utilize recent historical data, which implicitly include DERs.

Generation

PJM added 560 MW of new on-peak generation capacity since the 2024 LTRA. The new projects include one wind project at 24.5 MW and 19 solar projects totaling 535.5 MW. An additional 70 MW in capacity was connecting in late 2025.

Substituting thermal resources (coal, natural gas, and oil) with renewable generation (wind, solar, storage, and hybrid resources) may get significantly more challenging as the energy transition progresses and flexible thermal resources are still needed to maintain resource adequacy at one-in 10 LOLE.

Maintaining an adequate level of generation resources with the right operational and physical characteristics is essential for PJM’s ability to serve consumer demand through the energy transition. The composition and performance characteristics of the resource mix will ultimately determine PJM’s ability to maintain reliability. Today, thermal resources supply ERSs. Until a different technology can provide a reliable substitute at scale, an adequate supply of thermal resources will be needed to maintain grid stability.

Increasing levels of intermittent resources create significant variability and uncertainty to be managed by flexible resources. If the gas fleet of today remains as is, or decreases due to regulatory pressures, but additional storage resources do not get built at pace, immense pressure will be placed on natural gas to supply the ramping needs for the system. Changes to market mechanisms will be evaluated to ensure that adequate resources are incentivized to help PJM manage increasing system uncertainty and volatility.

For example, in 2025, FERC approved a PJM-proposed expansion of Surplus Interconnection Service to augment the operating efficiency and availability of existing resources, and the Reliability Resource Initiative, which attracted 11,000 MW of nameplate capacity in proposed, shovel-ready generation projects. PJM projects that the initiatives will boost Tier 1 resources by an additional 8.3 GW in summer periods and 3.4 GW in winter periods from the original 2025 LTRA data submittal.

Such initiatives also impacted Tier 2 resources from 2026 to 2031, netting an additional 8.2 GW in summer capacity from the original 2025 LTRA data submittal and 4.1 GW in winter capacity. These net increases factor resources that transitioned from Tier 2 to Tier 1, the Reliability Resource Initiative, and any recently withdrawn projects.

However, many of these projects continue to be slowed or stopped by factors that extend beyond PJM and affect multiple regions across the continent, including local opposition, state/local permitting delays, supply chain challenges, and financing.

PJM uses some differing capacity assumptions between the LTRA and ProbA. The LTRA counts more resource additions, mainly new solar and gas combined-cycle units, which may not actually become operational. In contrast, the ProbA is more conservative, excluding some Tier 1 resources that might not reach the in-service date as planned. Additionally, the LTRA only accounts for officially announced

retirements, while the ProbA also factors in potential retirements caused by state environmental policies, particularly affecting coal resources projected to retire by 2029.

As of June 2025, all generation capacity resources, with the exception of VERs, that are committed in PJM’s Reliability Pricing Model or committed in a PJM Fixed Resource Requirement Plan shall be subject to operational testing initiated by PJM up to two times in each of the summer and winter seasons during the relevant delivery year. (Seasons are defined as: summer (May–October) and winter (November–April). Generation operational tests will be unannounced tests. The tests are being conducted to verify that generating resources can reliably operate when needed.

Energy Storage

Energy storage development continues in PJM. As solar generation increases in PJM, growth of storage is expected to follow since storage devices are frequently co-located with solar projects. Efficient grid operations in an era of rapid renewable energy resource growth will require greater system flexibility. Energy storage can offer grid operators another tool to maintain stable power supply under varying wind and solar power output driven by weather conditions or unit outages. Storage can also improve grid efficiency by increasing utilization of existing transmission lines. PJM continues to work with members, Department of Energy DOE national laboratories, and other industry entities to advance the use of energy storage and, in particular, enable its participation in PJM markets.

There is approximately 162 GWs of solar, wind, battery and hybrid in the PJM interconnection queue requesting capacity injection rights. Hybrid resources make up approximately 20 GWs and standalone storage makes up approximately 40 GWs.

To address the limited-duration issue, some developers are pairing storage with variable, renewable generation, such as solar or wind, to create opportunistic revenue streams. The pairing is either co-located (in which the storage facility and the generator facility are sited on the same parcel of land, but each has its own connection to the grid) or is hybrid (in which the storage facility and generator share a common connection to the grid).

Currently new storage is dispatched similar to other generators in economic order. No more specific operation has been considered due to the small penetration. Many older batteries are used for regulation.

Capacity Transfers

PJM does not rely on significant transfers to meet resource adequacy requirements. Maximum transfer (total transmission interchange capability) into PJM would amount to less than 2% of PJM’s internal generation capability. At no time within this assessment period does the ARM get anywhere near 2%. PJM reliability would not be negatively affected if its transfers were dropped to zero.

Transmission

Beginning in 2023, PJM began to identify trends encompassing large load increases in specific areas, driven primarily by the construction of new data centers, and these were incorporated in PJM’s 2024 RTEP cycle analyses for five-year (2029) and eight-year (2032) study year models. The large load increases are driving heavier, increased regional transfers and the consequent need for significant system reinforcement. PJM’s load forecasting process incorporates methods by which it solicits and applies large load adjustments by transmission zone. Electrification itself is the process of converting conventional end-use load that uses fossil fuels (e.g., gas stoves and oil-burning furnaces) to use electricity instead, as well as the increased use of EVs. This is having a significant impact on the magnitude of the load forecast and load shape. Notably, additional electric heating will narrow the gap between summer and winter peaks.

Most transmission additions are related to local load deliverability problems and not new generation enhancement in Tier 2. Each generator is responsible for transmission enhancements associated with its interconnection and network enhancements if necessary. PJM does not use Tier 3 resources.

PJM’s analysis of 2029 and 2032 summer, winter and light load conditions identified 8,520 thermal and voltage criteria flowgate violations across PJM, of which 1,609 were ineligible from competitive windows. The 6,911 remaining violations were addressed in 2024 RTEP Proposal Window No. 1

The large number of violations observed in the 2024 RTEP were driven by heavy west-to-east transmission interface flows caused by large load increases in the Dominion zone and in eastern PJM: 10 GW and 15 GW load increase for 2029 and 2032 between the load forecasts used for the 2022 and 2024 RTEP study cycles, respectively. The significant load growth is attributed primarily to data centers, electrification, and electric vehicle developments.

From PJM’s 2024 RTEP Proposal Window No. 1 (July–September 2024), 94 competitive proposals to solve the 6,911 NERC reliability criteria violations identified in the RTEP 2029 model year analysis as well as those identified in the 2032 model year requiring long-lead-time transmission solutions. The PJM board approved \$5.9 billion worth of regional and local projects to address the reliability criteria violations.

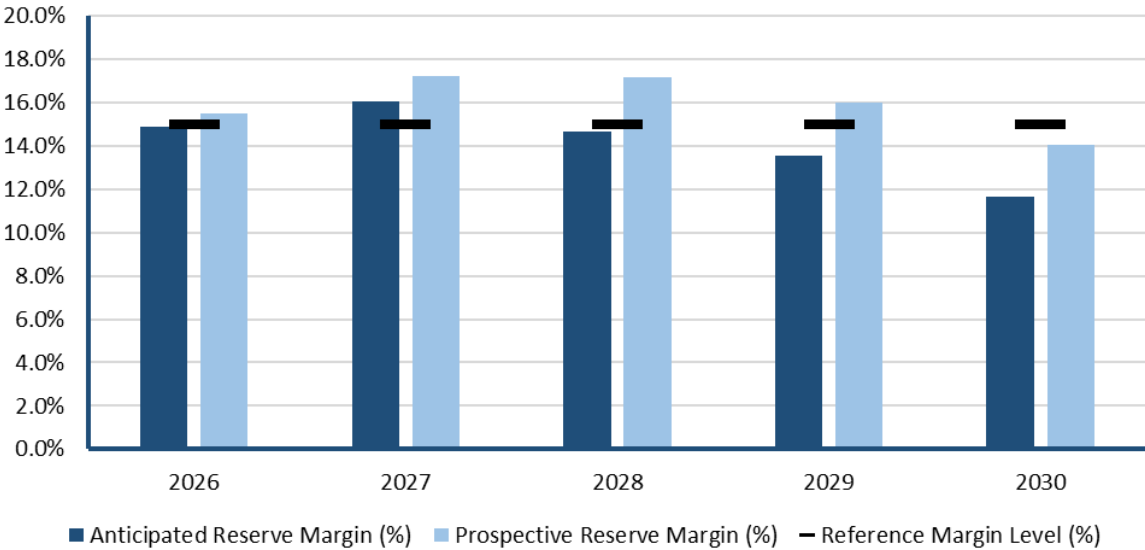


SERC-Central

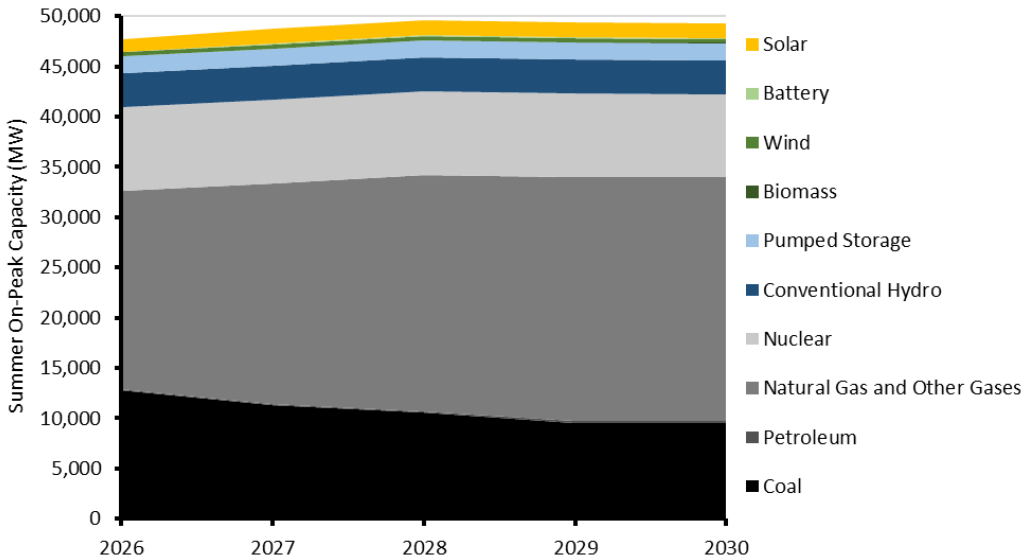
SERC-Central is an assessment area within the SERC Regional Entity. SERC-Central includes all of Tennessee and portions of Georgia, Alabama, Mississippi, Missouri, and Kentucky. Historically a summer-peaking area, SERC-Central is beginning to have higher peak demand forecasts in winter. SERC is one of the six companies across North America that are responsible for the work under FERC-approved delegation agreements with NERC. SERC-Central is specifically responsible for the reliability and security of the electric grid across the Southeastern and Central areas of the United States. This area covers approximately 630,000 square miles and serves a population of more than 91 million. The SERC Regional Entity includes 36 BAs, 28 Planning Authorities, and 6 Reliability Coordinators.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	43,066	43,512	44,298	44,616	45,280	45,975	46,034	46,168	46,412	46,619
Demand Response	2,818	3,047	3,287	3,356	3,364	3,377	3,392	3,367	3,323	3,301
Net Internal Demand	40,248	40,465	41,011	41,260	41,916	42,598	42,642	42,801	43,089	43,317
Additions: Tier 1	518	492	4,567	5,435	5,435	5,435	5,435	5,435	5,435	5,735
Additions: Tier 2	20	245	837	837	837	837	837	837	837	837
Additions: Tier 3	178	234	300	362	743	795	2,107	3,293	5,539	5,591
Net Firm Capacity Transfers	460	391	-288	-287	-287	-221	-221	-220	-220	-157
Existing-Certain and Net Firm Transfers	47,859	47,438	45,895	44,503	43,474	43,382	43,448	42,484	42,485	41,414
Anticipated Reserve Margin (%)	19.1%	20.8%	19.7%	18.5%	16.5%	14.8%	12.4%	12.0%	8.7%	9.0%
Prospective Reserve Margin (%)	19.7%	22.0%	22.3%	21.1%	19.0%	17.3%	14.9%	14.5%	11.2%	11.5%
Reference Margin Level (%)	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%



Planning Reserve Margins



Existing and Tier 1 Resources

SERC-Central Highlights

- SERC-Central is projected to remain above its RML through 2030. The ProbA shows no loss of load over the 2027 and 2029 study years.

SERC-Central Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	12,782	11,308	10,595	9,565	9,565
Coal*	12,782	11,308	9,944	8,914	8,914
Petroleum	128	128	128	128	128
Natural Gas	19,706	21,956	23,483	24,341	24,249
Natural Gas*	19,279	21,529	22,585	23,443	23,443
Biomass	37	37	37	37	37
Solar	1,181	1,408	1,445	1,455	1,455
Wind	370	370	370	370	370
Conventional Hydro	3,405	3,405	3,405	3,405	3,405
Pumped Storage	1,247	1,247	1,247	1,247	1,247
Nuclear	8,280	8,280	8,280	8,280	8,280
Battery	100	135	135	135	135
Total MW	47,236	48,274	49,124	48,963	48,871
Total MW*	47,256	48,267	47,996	47,835	47,835
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to be included in system plans are removed from the resource projection where marked.					

SERC-Central Assessment

Planning Reserve Margins

PRMs are crucial for ensuring the reliability and adequacy of electric transmission systems in the Central assessment area, with various entities employing different methodologies and targets. The concept of LOLE, often aiming for a standard of one day in 10 years (0.1 LOLE annually), is a critical metric used to establish these targets.

Several entities establish reserve margin levels based on resource adequacy study results. For instance, one entity sets target reserve margins at 29% in winter and 23% in summer, determined using a 1-in-10 LOLE study, a change from its previous economic reserve margin approach, which resulted in lower targets. Another entity performs a reserve margin study using the Astrapé Strategic Energy and Risk Valuation Model (SERVM) to establish summer (18%) and winter (25%) planning targets, balancing seasonal risk and cost, which also aligns with a 1-in-10-year expected probability of a loss-of-load event. Another entity uses the NERC/SERC-accepted 15% reserve margin for predominantly thermal systems, which is generally consistent with a one-day-in-10-year loss of load. Methodologies for determining these margins often involve probabilistic modeling using extensive weather data (e.g., 40 years of weather data with Astrapé SERVM) and simulations of hourly forced outages, load, market availability, and renewable resources. Key drivers of risk often include extreme weather, low renewable generation, forced outages, and limited import capability.

Since the 2024 LTRA, some significant changes have occurred or are underway. One entity recently updated its minimum reserve margin constraints from economic reserve margin targets to a resource adequacy standard of one day in 10 years LOLE. This entity also conducted a LOLE study that incorporated improvements such as enhanced peak demand modeling and additional sensitivities, including temperature-dependent outage probabilities. Load forecasting is also updated annually to meet NERC MOD-32 requirements, aiming to maintain reserve margins at minimal cost while balancing risk, reliability, environmental responsibility, and flexibility.

Currently, most entities’ ARMs are not expected to fall below their RMLs. However, challenges stemming from load growth and increased load sensitivity to weather, particularly in winter, have led to a reduction in reserve margin levels over the next 10 years for some. To address potential shortfalls and future needs, resource additions are being planned, including solar facilities, natural gas combined-cycle units, and battery storage. Utilities also account for uncertainty and variability in assumptions through quantitative scenario modeling and probabilistic weighting of key assumptions. The results of energy risk assessments are used to establish or confirm PRM targets based on simulations and scenario analyses, which account for variability in load, weather, and unit outages to ensure system reliability.

Non-Peak Hour Risk, Energy Assurance, Probabilistic Based Assessments

Energy risk assessments are an evolving aspect of grid reliability planning, moving beyond traditional peak-demand analyses to encompass all potential hours of the year, including non-peak periods in the Central subregion. These comprehensive assessments are vital due to the increasing variability and uncertainty in system demand and resource mix. Utilities employ a range of methods for these assessments, often including detailed LOLE studies that simulate hourly conditions over a 10-year horizon, incorporating extensive historical weather data and system flexibility. Some entities adopt a holistic, year-round planning approach that integrates scenario-based reserve margin analysis and robust fuel inventory management to handle supply and demand uncertainties. Probabilistic modeling is commonly used, leveraging extensive weather data (e.g., 40 years of weather data), and simulating hourly forced outages, load, market availability, and renewable resources to identify risks across a wide range of conditions.

Key drivers of risk examined in these assessments include extreme weather (both highly unexpected demand impacts and unseasonable conditions), low renewable generation, forced outages, and limited import capability. Other factors considered are low water conditions, fuel availability (such as natural gas pipelines and their interdependencies), resource outages, transmission constraints, common mode failures, correlated and dependent outages (derations), ramping limitations, and flexibility requirements. The results of these energy risk assessments are directly used to establish or confirm PRM targets, which are designed to account for variability in load, weather, and unit outages to ensure overall system reliability. These assessments also emphasize the importance of a balanced and diversified generation portfolio to reduce dependency on single sources and to hedge against supply disruptions. Furthermore, they support detailed operational planning, such as maintaining higher reserve margins during shoulder months to mitigate risks from maintenance outages and unpredictable weather, and implementing fuel security measures like firm transportation contracts and fuel inventory targets. Ultimately, the outcomes of energy assessments inform and guide a broad spectrum of strategic, operational, and planning decisions, ensuring that utilities can build robust, adaptive plans to provide consistent and reliable service despite external uncertainties and the evolving conditions of the electricity system.

ProbA Results

In the SERC model, based on data and assumptions, SERC-Central does not show any loss of load risk for 2027 nor 2029 for any of the 5375 cases. The annual metrics are shown below.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	0.10	0	0
NEUE (ppm)	0.00	0.00	0.00
LOLH (hours per Year)	0.00	0.00	0.00
*Provides the 2024 ProbA Results for Comparison			

However, the study shows overall reliance on imports from neighboring areas with the potential of insufficient local generation to meet the demand. The month of April in particular shows the risk of low hydro generation, which can coincide with planned maintenance outages. The summer load forecast is expected to grow by 1,005 MW and winter load forecast is expected to grow by 781 MW from 2027 to 2029. At the same time, there is an expected retirement of approximately coal generation in 2028, leading to tighter margins. Close to 2,600 MW of gas generation is expected to be added in the same period. Based on the ProbA, overall margins get tighter in 2029.

Demand growth, planned generator retirements, fuel diversity and reliance on imports contribute to growing energy risks. SERC and the SERC Central entities will need to continue to monitor the resource adequacy studies.

Demand

Utilities in the Central assessment area employ comprehensive and evolving methodologies to project future energy and demand needs, crucial for accurate system planning. Load forecasts are regularly updated, typically every one to two years, drawing heavily on historical data including hourly load profiles, economic indicators, demographic trends, and weather patterns. Many entities utilize econometric or regression-based models to capture the relationship between energy usage and variables like temperature, population, and housing. To account for uncertainty and variability, some utilities develop multiple forecast scenarios, employing historical weather extremes or probabilistic modeling to capture a range of potential outcomes. Forecasts also integrate emerging factors such as DERs, EVs, and end-use efficiency trends. Advanced modeling techniques include shaping system forecasts with hourly load profiles by customer class and DER type, with adjustments for anticipated industrial or commercial growth. Load forecast uncertainty (LFU) is managed through both quantitative scenario modeling and probabilistic weighting of key assumptions. Forecasts beyond a 10-year horizon, while highly uncertain, provide insights into potential long-term drivers such as the addition of data centers and large commercial/industrial loads, which can substantially increase demand and are often modeled as sensitivities in reliability studies. Electrification trends, particularly in home heating, contribute to increased winter peak sensitivity, and transportation electrification is expected to become a more significant driver beyond the 10-year horizon. While climate change and extreme weather impacts often are not pronounced in probabilistic load models, some models are

refined to reflect more frequent cold weather patterns, and load impacts are often addressed through scenario planning rather than directly embedded in long-range forecasts.

Demand-Side Management

DR and other DSM programs vary significantly across utilities in the Central assessment area, playing a role in managing demand and enhancing system flexibility. Some entities model their DR programs as dispatchable supply-side resources, meaning their contribution is not reflected as load reductions in forecasts, with available capacity often estimated based on historical performance and being highly weather-dependent. Plans are in place for significant expansion of DR capacity over the next five years by some entities. Specific programs include legacy Interruptible Power, the newer PowerFlex offering greater flexibility in response times, and the relaunched dispatchable voltage regulation (DVR) program, which provides enhanced credits for both emergency and capacity events. Conservation voltage reduction (CVR) is employed as a 24/7 energy-efficiency tool, and Peak Rewards is an aggregator-based DR program for large commercial and industrial customers. Capacity from these programs is estimated based on historical reactivity to voltage changes and forecasted load, with some having specific use limitations, such as 400 event hours per year for DVR. While some smaller entities in Central report no current or planned dispatchable DR programs or note that DR is not a significant factor in their resource planning, other entities are actively growing this resource class, particularly for DR and peak load management. These aggregator-based programs are included in IRP inputs and modeled through semi-annually updated Power Supply Plan processes. The development and refinement of these programs help utilities ensure consistent and reliable service by balancing supply and demand, especially during critical periods.

Distributed Energy Resources

DERs, primarily solar PV, are generally incorporated into net load forecasts by most entities within the Central assessment area, though the specific methodologies and extent of integration vary. Some entities utilize historical data and national laboratory research to integrate distributed generation and EVs into their peak demand and energy forecasts. For example, one entity projects solar PV to reach approximately 1% of summer peak demand by 2028, with total DER capacity anticipated to be 153 MW by 2032. Another entity, which incorporates both BTM and front-of-meter DERs, forecasts solar PV penetration to grow from 250 MW by 2029 to 350 MW by 2034. They model BTM resources using irradiance-based hourly shapes and treat program-based solar as a fixed energy supply with simulated profiles. Future DER growth is projected using adoption curves based on economic payback periods and market trends, also accounting for local self-generation programs that allow up to 5% of annual energy needs.

However, some entities in the region either do not currently utilize or separately account for DERs due to minimal penetration or a lack of utility-sponsored programs. One entity has implemented a

cap on DER penetration at 10% of peak demand, expecting to reach this limit within five years, and models DERs at 80% of capacity during system peaks. IBRs, which include many DERs, are subject to rigorous modeling and verification processes, including fault ride-through testing, oscillation monitoring, and the enforcement of a minimum short-circuit ratio (SCR) to maintain system reliability.

The contribution of DER aggregators is currently limited but is actively expanding in the assessment area, with select entities integrating them into planning and demand-side management strategies. These aggregator-based programs are included in the entity’s Integrated Resource Plan (IRP) inputs and are modeled through its semi-annually updated Power Supply Plan process. While some smaller entities report no current or planned dispatchable DR programs or note that DR is not a significant factor in their resource planning, others with minimal DER participation do not account for them separately in resource planning. The capacity from DER aggregators, where applicable, is generally reflected as part of DR resources and modeled as dispatchable or embedded in the net load forecast, depending on the entity. Overall, the assessment area sees a proactive effort by leading entities to grow this resource class for DR and peak load management as the energy landscape evolves.

Generation

Utilities in the Central assessment area are actively engaged in managing their generation portfolios, which are undergoing significant transformation, primarily driven by the integration of IBRs and a focus on flexible, dispatchable capacity. Planning entities have mechanisms to prevent the retirement of reliability-critical units, such as state laws mandating replacement with dispatchable capacity or ensuring replacement generation is established before retirement. Reliability and reserve margin studies are used to assess the impacts of retirements. One entity maintains its plan to retire a 297 MW coal-fired unit in 2027 due to economic and environmental factors, though the timing is under reassessment. There have been no changes to confirmed or unconfirmed retirements since the 2024 LTRA, with entities projecting no new retirements.

Changing Resource Mix and Operational Considerations: Entities are addressing potential operational issues stemming from this evolving resource mix, particularly due to the increased penetration of solar, BESS, natural gas, and hydro resources. For instance, one entity is retiring a 297 MW coal-fired unit and adding approximately 240 MW of utility-owned solar, a 645 MW natural gas combined-cycle (NGCC) unit, and a 125 MW battery storage facility to enhance system ramping flexibility and absorb more intermittent generation. While annual stability assessments generally show no transmission stability issues, some entities have observed operational challenges related to IBR controls, tuning, and power oscillations. To mitigate these, advanced testing and commissioning processes for new IBRs are being implemented, including a “burn-in” period, and utilities require utility-scale solar resources to operate on automatic generation control (AGC) and allow for

automated, proportional output reductions during surplus conditions. Planning activities regularly assess system inertia with IBRs, finding no critical issues related to low system inertia so far.

Addressing Net Demand Ramping Needs: Planners are proactively ensuring sufficient flexible resources are available for long-term net demand ramping needs. Some entities maintain a diverse mix of flexible, dispatchable resources with no planned thermal asset retirements, ensuring adequate inertia and system stability. One larger entity is preparing for the potential integration of up to 11,000 MW of solar over the next 15 years. Proactive measures include replacing 1,400 MW of aging combustion turbines (CTs) with 1,500 MW of modern Frame-type CTs, refurbishing older peakers, and planning for at least 500 MW of new aeroderivative CTs to support flexibility. Exploration of **long-duration energy storage technologies**, such as pumped hydro, gravity-based systems, and flow batteries, is also underway to provide future flexibility. A contractual ability to curtail solar output during times of low demand and high solar output, particularly in spring, serves as a backup measure.

Capacity Contribution Values for Various Resources: Capacity contribution values for different generation types vary based on resource characteristics and available data:

- **Thermal resources** typically use historical performance data, with planned additions relying on vendor guarantees. Forced outage rates for thermal units are generally not reflected in the reported values.
- **VERs** like wind and solar utilize seasonal or monthly net dependable capacity (NDC) values based on historical performance or modeled solar irradiance at peak times. For example, one entity uses 84% of nameplate capacity for solar in summer and 0% in winter, while another uses a 50% confidence level for monthly wind and solar contributions, accounting for inverter risk.
- **Energy storage** contributions vary by duration and reliability benefit; one entity assigns 93% for 8-hour storage and 85% for 4-hour storage, considering 4-hour duration sufficient for reliability.
- **Hydroelectric resources** are evaluated using historical seasonal performance. Most methodologies have remained consistent since the previous LTRA, with updates primarily to assumptions for loads, outages, and transmission imports. Probabilistic modeling, such as ELCC, is used to ensure resource adequacy.

IBR Performance and Reliability: Entities are actively addressing reliability risks from IBRs through various study requirements and operational protocols. Some require EMT models as part of the interconnection study process. Rigorous modeling and validation practices are implemented, including mandating PSSE and PSCAD models for interconnection, enforcing quality control, and evaluating harmonic distortion. A key focus is on inverter control systems that prevent momentary cessation and ensure inverters remain on-line during voltage and frequency excursions. While no

protection schemes or ancillary service needs have explicitly emerged, increased regulation demand has been observed with growing IBR penetration. AGC capability is being mandated for all new utility-scale solar facilities, and legacy plants are being retrofitted to allow system-wide output reductions for flexibility during surplus generation events. The primary challenges with IBRs relate to system stability and control rather than resource adequacy.

Generator Retirements

Natural Gas Fuel Supply Risk: Natural gas fuel supply risk is mitigated through various strategies, including **on-site fuel oil backup** at key generation sites and contingency-based studies simulating pipeline disruptions. One entity estimates that approximately **87% of its gas-fired winter peak capacity will have firm gas transportation or fuel oil backup** within the next five years. Following a 2022 winter event, reliability improvements were implemented by an affected pipeline operator. Strategies also include 100% storage-backed firm transportation for combined cycle units, diverse procurement and scheduling, and embedding fuels personnel in system operations for real-time communication with pipeline operators during contingency events. Long-term planning considers natural gas infrastructure limitations when evaluating new generation resource locations, ensuring fuel supply adequacy and construction timelines.

Energy Storage

Energy storage, primarily BESS, is being added to the system and is expected to contribute to reliability and flexibility. Expected uses include economic operation, reliability enhancements, peak shaving, and frequency response. The capacity contribution of energy storage is factored in based on its supply duration, with entities considering different minimum durations (e.g., 4-hour or 8-hour discharge capability). One entity is adding a 125 MW battery storage facility. These resources are incorporated into long-term planning through IRPs and power supply processes.

Capacity Transfers

The Central assessment area is proactively managing capacity transfers and ensuring transmission adequacy through a variety of studies, strategic investments, and coordinated efforts to maintain system reliability amidst an evolving resource mix and load growth.

The assessment area's ability to transfer capacity is continuously evaluated and is evolving:

- **Evaluation Methods:** Transfer capabilities are assessed through biennial resource adequacy studies that account for firm contracts and probabilistic delivery expectations, showing a positive contribution from increased firm contractual capacity to overall reliability. Seasonal assessments are also conducted to identify surplus transfer capacity across different times of the year, allowing for more accurate planning of bidirectional flows and optimizing the scheduling and delivery of transfers.

- **Observed Impacts and Trends:** One entity has seen an increased reliance on external generation resources, with over 6% of its firm capacity sourced from outside its immediate footprint, driven by fossil unit retirements, load growth, and shifts in its generation portfolio. While no significant changes in power flow patterns have been identified overall, the ongoing transition in the resource mix, along with planned retirements and new additions, is anticipated to influence future transfer scheduling, surplus availability, and bi-directional flow characteristics.
- **Coordinated Efforts:** Entities are implementing various coordination efforts to ensure reliable capacity transfers:
- **Seasonal Capacity Transfer Studies** analyze how different system conditions (e.g., summer and winter peaks, shoulder months) impact import/export capabilities.
 - A transfer monitoring process tracks firm capacity from external generators, ensuring their reliable availability during peak conditions.
 - Coordination with neighboring balancing authorities is undertaken to secure contractual commitments and physical transfer capability.
 - Some entities embed transfer analysis into their long-term planning documents (e.g., IRPs) to evaluate how future firm transfers impact transmission constraints and local reliability.

Transmission

Entities in Central are maintaining transmission adequacy, with significant projects and planning processes in place to address limitations and ensure reliability.

- **Major Transmission Projects:** The assessment area is undertaking numerous projects to support reliability and accommodate changing load and generation patterns. These include the following:
 - **New Line Construction:** Approximately 158 miles of new 345 kV lines and 18 miles of 161 kV lines, along with new 56 MVA 161/69 kV stations
 - **Substation Construction and Expansion:** Three new 345/161 kV stations and one new 161 kV switching station
 - **Transformer Additions/Upgrades:** Various upgrades to 345/161 kV and 161/69 kV transformers to increase capacity
 - **Line Rebuilds and Voltage Conversions:** Over 227 miles of 161 kV lines are being rebuilt, and nearly 20 miles of 69 kV lines are being converted to 161 kV

- **Voltage and Stability Projects:** Installation of a 60 MVAR capacitor bank (by 2025) and planned Statcoms to address voltage reliability
- **Regional Reinforcements:** Projects like a new 161 kV Line and Apalachia Area Improvements are critical to mitigate thermal overload, voltage collapse, and support native load reliability
- **Identified Transmission Limitations:** Planning studies have identified constraints often associated with transformer overloads, line loading issues, or high-voltage conditions.
- **Mitigation Planning and Actions:** To address identified limitations, utilities employ the following:
 - **Operating Guides and Real-Time Controls:** Providing generation dispatch limits or specific switching actions for constrained locations
 - **Infrastructure Expansion:** Planning multiple long-term system reinforcements
 - **Congestion Management Processes:** Using system operator tools and protocols to re-dispatch generation or adjust flows
 - **Annual Transmission Assessments:** Identifying and addressing long-term transmission constraints, including new service requests and interconnections
- **Changes to Transmission Planning Processes:** Since the 2024 LTRA, several enhancements are being implemented or considered:
 - Expanding the biennial Long-Range Plan to incorporate power transfers and extreme weather events
 - Updating generator interconnection and affected system procedures to comply with FERC Order No. 2023, with one entity transitioning to a cluster study approach (transitional cluster in 2025, full cluster in January 2026) to streamline interconnection requests and reduce backlogs
 - Evaluating multi-value projects through resource and capacity assessments to proactively address long-term transmission needs

Reliability Issues

The Central assessment area is actively managing and addressing a range of reliability issues stemming from evolving system conditions, including changes in resource mix, load growth, and extreme weather.

- **Reduced Reserve Margins and Challenges from Load Growth:** Entities in the SERC-Central region are confronting challenges due to load growth and an increased sensitivity of load to weather, especially in winter, which has resulted in a reduction in reserve margin levels over the next 10 years. While some entities anticipate their ARMs will not fall below their RMLs, one entity projects that without replacement resources, its reserve margin would fall below its target range due to a unit retirement in 2027, necessitating further resource additions for increasing economic development load beyond 2027. Underlying reliability issues include increasing winter peak demand sensitivity to weather and the potential for new large commercial loads. To address this, resource additions are being planned, and some entities are shifting their minimum reserve margin constraints to a resource adequacy standard of one day in 10 years LOLE, moving away from prior economic reserve margin targets that resulted in lower targets. Large industrial or commercial load additions, such as data centers and manufacturing centers, are actively monitored as they can introduce reliability risks due to short lead times and uncertain scalability, potentially challenging load forecasting and transmission development.
- **Operational Issues and System Stability with the Changing Resource Mix, Particularly IBRs:** The assessment area is actively addressing potential operational issues stemming from the increasing integration of IBRs like solar and BESS. Some entities have experienced operational challenges related to IBR controls, tuning, and power oscillations, including instances where solar generation contributed to over-generation events. While annual stability assessments have not yet identified transmission stability issues or critical issues related to low system inertia, increased regulation demand has been observed with growing IBR penetration. To manage these risks, entities are implementing proactive measures such as advanced testing and commissioning processes for new IBRs, requiring them to demonstrate stable performance. New utility-scale solar facilities are being mandated to operate on AGC, and legacy plants are being retrofitted for system-wide output reductions to provide flexibility during surplus generation events. The primary challenges related to inverter risks in the assessment area are system stability and control, rather than resource adequacy.
- **Natural Gas Fuel Supply Risk:** The reliability of the BPS faces risks from natural gas generator fuel supply issues, including production or transportation curtailments and limitations during both normal and extreme weather conditions. To mitigate these risks, various strategies have been developed.

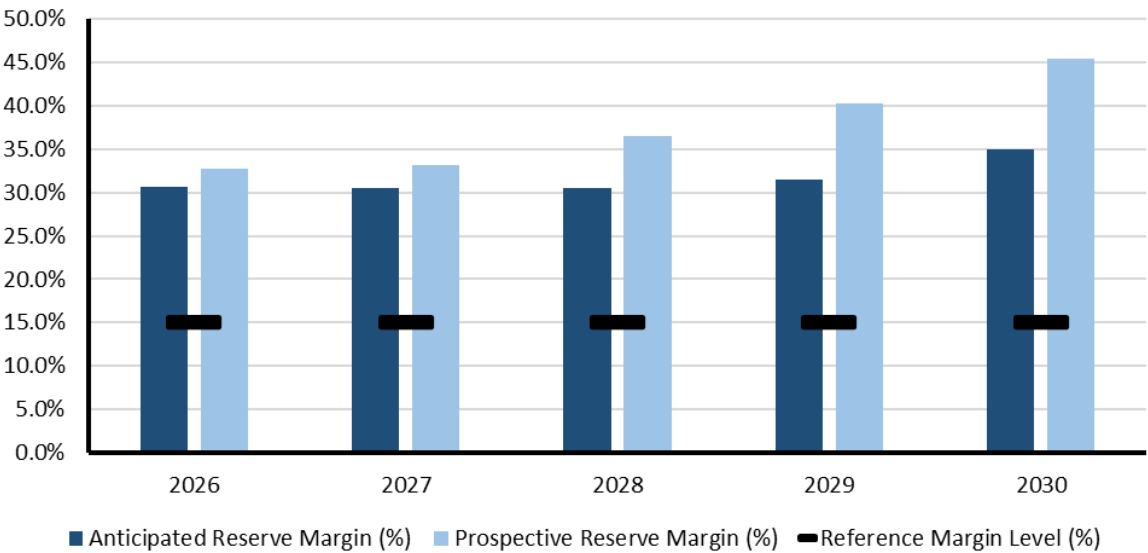


SERC-East

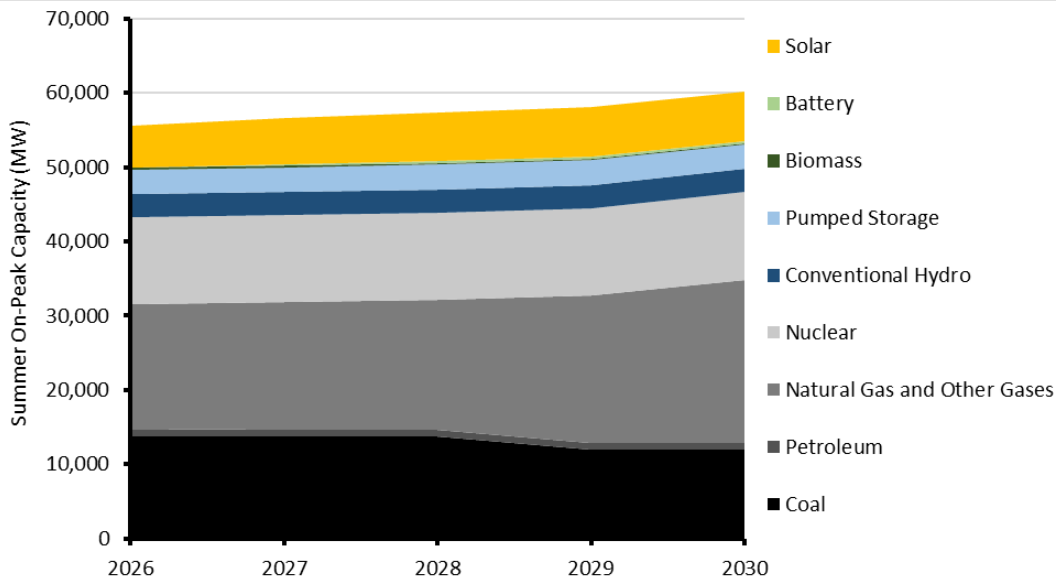
SERC-East is an assessment area within the SERC Regional Entity. SERC-East includes North Carolina and South Carolina. Historically a summer peaking area, SERC-East is beginning to have higher peak demand forecasts in winter. SERC is one of the six companies across North America that are responsible for the work under FERC-approved delegation agreements with NERC. SERC is specifically responsible for the reliability and security of the electric grid across the Southeastern and Central areas of the United States. This area covers approximately 630,000 square miles and serves a population of more than 91 million. The SERC Regional Entity includes 36 BAs, 28 Planning Authorities, and 6 Reliability Coordinators.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	44,414	45,289	45,893	46,128	46,646	47,256	47,776	48,445	48,870	49,313
Demand Response	1,608	1,620	1,621	1,652	1,679	1,702	1,726	1,751	1,773	1,795
Net Internal Demand	42,806	43,669	44,272	44,476	44,967	45,554	46,050	46,694	47,097	47,518
Additions: Tier 1	959	2,109	2,817	5,282	7,348	8,656	9,921	11,186	11,186	11,186
Additions: Tier 2	215	484	2,009	3,231	4,045	4,551	5,114	6,232	9,022	9,022
Additions: Tier 3	0	0	0	0	0	0	0	0	0	0
Net Firm Capacity Transfers	150	150	150	236	236	236	236	236	236	236
Existing-Certain and Net Firm Transfers	54,964	54,880	54,953	53,222	53,316	52,237	50,919	50,919	49,557	49,557
Anticipated Reserve Margin (%)	30.6%	30.5%	30.5%	31.5%	34.9%	33.7%	32.1%	33.0%	29.0%	27.8%
Prospective Reserve Margin (%)	32.7%	33.1%	36.5%	40.3%	45.4%	45.1%	44.7%	47.8%	49.5%	48.2%
Reference Margin Level (%)	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%



Planning Reserve Margins



Existing and Tier 1 Resources

SERC-East Highlights

- The 2025 ProbA reveals elevated levels of risk occurring in both the 2027 and 2029 study years.
- To offset the upcoming retirements, SERC-East has planned 2 GW of solar resources and 8.9 GW of gas additions over the next 10 years.

SERC-East Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	13,715	13,715	13,715	11,898	11,898
Petroleum	1,044	992	992	992	992
Petroleum*	1,044	868	868	868	868
Natural Gas	16,737	17,081	17,396	19,816	21,851
Biomass	176	176	176	176	176
Solar	5,649	6,223	6,626	6,671	6,702
Conventional Hydro	3,094	3,094	3,094	3,094	3,094
Pumped Storage	3,324	3,324	3,324	3,324	3,324
Nuclear	11,795	11,795	11,808	11,808	11,902
Battery	8	208	258	258	258
Total MW	55,540	56,606	57,388	58,035	60,196
Total MW*	55,540	56,482	57,264	57,911	60,072
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to be included in system plans are removed from the resource projection where marked.					

SERC-East Assessment

Planning Reserve Margins

PRMs in the assessment area are generally expected to remain above reference levels over the next five years, indicating no immediate system-wide resource adequacy concerns. However, there are variations among entities. For instance, one generation-only BA with an all-hydro portfolio finds reserve margin requirements inapplicable, while another entity reports sufficient margins. A third entity anticipates potential reserve margin challenges starting in Winter 2027 due to significant new load additions and its targeted 18% winter reserve margin. To address this, it has issued requests for proposals for new capacity resources, including battery energy storage, and is evaluating longer-term options.

Other entities expect their reserve margins to remain above the 15% reference level for both near-term (0–5 years) and longer-term (6–10 years) outlooks, despite significant projected winter load growth of approximately 2% annually, which is expected to increase winter peak demand by about 6,500 MW by 2035. Their IRPs identify substantial new resources through 2035, including thousands of megawatts of solar, battery storage, wind, combustion turbines, combined-cycle units, and small modular nuclear reactors. They also plan to implement uprates to existing units. These entities aim to achieve a 22% winter PRM by 2031. Approximately 5,800 MW of coal generation is slated for retirement over the next decade, but these retirements are contingent on securing sufficient replacement capacity to maintain reliability and meet the 22% winter reserve margin target. Without firm replacement resources, coal retirements would be deferred to preserve system reliability.

Since the 2024 LTRA, most entities have not significantly changed their resource adequacy planning or procurement processes. One entity, operating hydro-only resources, has not made any changes, nor has another entity that is replacing coal-fired generation with natural gas combined-cycle units, though this shift indirectly enhances reliability. However, a third entity, based on its 2022 LOLE study, increased its winter reference PRM from 12% to 18% by 2026, while maintaining the summer reserve margin at 15%. This adjustment reflects heightened concern over winter reliability risks due to electrification trends and potential load increases. Other companies continue to refine strategies for load growth, resource additions, unit uprates, and retirements, maintaining an “all-of-the-above” strategy.

The RML is typically determined by each entity using probabilistic reliability metrics, commonly targeting a LOLE of no more than 1 day in 10 years, or to comply with state requirements. Entities establish separate summer and winter RMLs, considering factors such as load forecast uncertainty, generator availability, and extreme weather impacts. Planning relies on detailed statistical modeling and ELCC studies to assess resource contributions, particularly for variable energy resources like solar,

batteries, and wind. The capacity contribution values for variable energy resources and energy storage are determined by ELCC analyses, which discount nameplate capacity to firm, dependable capacity to meet LOLE standards, while non-variable resources like thermal units are counted at their nameplate capacity. Uncertainty and variability in assumptions are accounted for through “High” and “Low” load forecast scenarios that vary demographic and economic growth, large-load adoption rates, rooftop solar penetration, and EV uptake, which in turn drive planning reserve and resource-adequacy sensitivity cases. Although no major methodological changes occurred over the past year, there is a clear trend toward higher winter margins and an emphasis on flexible, dispatchable resources. A reliability verification step within the IRP process ensures that any developed portfolio meets reliability criteria, regardless of its stated installed capacity (ICAP) margin.

Energy Risk, Probabilistic-Based Assessments

Entities within the assessment area exhibit varying approaches to assessing energy risk, with some currently in the early stages of implementation or lacking formal processes. For instance, one generation-only BA with an all-hydro portfolio has not identified any energy risks to date. Another entity has yet to establish a formal energy risk assessment process but is preparing for the forthcoming implementation of NERC’s BAL-007-1 standard, which will mandate the development of such procedures and assessments. A third entity also acknowledges the importance of developing these capabilities but currently has no established process or results to report.

Despite the current limitations in formal assessments, the sources indicate that key drivers of energy risk expected to be considered in future evaluations include the following:

- Fuel availability constraints, particularly concerning natural gas supply and delivery
- Impacts from unseasonable extreme weather
- Limitations of variable energy resources
- Transmission or interchange constraints
- Correlated outages
- Other factors such as low water conditions, resource outages, and ramping limitations

Entities within the assessment area extensively employ probabilistic reliability metrics and studies as fundamental tools in their transmission and resource planning processes. These assessments are primarily centered on determining resource adequacy and PRMs, with a common objective of achieving a LOLE of no more than 1 day in 10 years. This probabilistic standard is a cornerstone for establishing the reliability needed to meet anticipated demand.

Key probabilistic assessments and their applications include the following:

- **LOLE Studies:** These studies are crucial for setting PRMs. For example, one entity increased its winter reference PRM from 12% to 18% by 2026 following a 2022 LOLE study, reflecting heightened concern over winter reliability risks due to electrification trends. The results from LOLE models are also used in a reliability verification step within IRPs to ensure that proposed resource portfolios can meet reliability thresholds year-round, including accounting for net demand ramping and energy adequacy needs.
- **ELCC Studies:** These are a specific type of probabilistic assessment used to determine the capacity contributions of VERs such as solar, wind, and battery storage. Unlike non-variable resources like thermal units, which are typically counted at their nameplate capacity, VERs and energy storage undergo ELCC analyses to discount their nameplate capacity to firm, dependable capacity that effectively contributes to meeting LOLE reliability standards. ELCC studies account for factors such as the intermittent, diurnal nature of solar output, especially noting that solar output is minimal during typical winter peak loads (early morning and late evening).
- **Statistical Modeling:** Entities use detailed statistical modeling to establish separate summer and winter RMLs, considering factors like load forecast uncertainty, generator availability, and extreme weather impacts. While no major methodological changes occurred over the past year, there is a clear trend toward higher winter margins and an emphasis on flexible, dispatchable resources.
- **Stochastic Analysis in Load Forecasting:** To account for the inherent uncertainties in demand, especially with the addition of large industrial customers like data centers, entities employ stochastic analyses. For instance, one entity uses a 50,000-trial stochastic analysis to capture the probability and timing of prospective data center and manufacturing projects.
- **Load Forecast Uncertainty (LFU) Scenarios:** Planning processes integrate “High” and “Low” load forecast scenarios that vary demographic and economic growth, large-load adoption rates, rooftop solar penetration, and EV uptake. These scenarios directly drive planning reserve and resource-adequacy sensitivity cases, allowing planners to assess system resilience under different conditions.

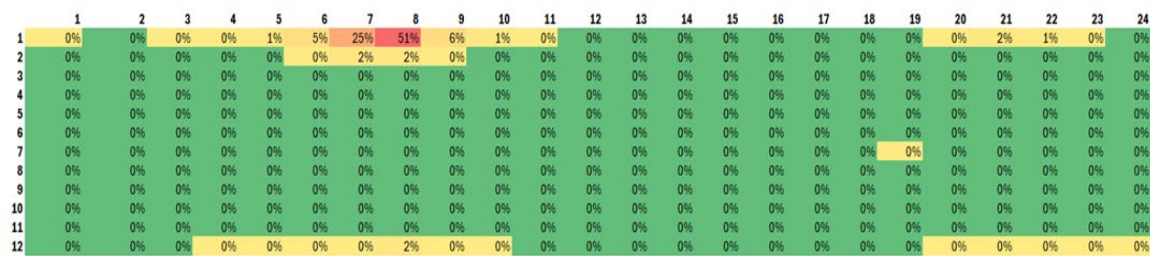
Regarding non-peak hour risk and energy assessments, entities are in varied stages of implementing formal processes. While some currently lack established procedures, they acknowledge the forthcoming implementation of NERC’s BAL-007-1 standard, which will mandate the development of such assessments. As these formal energy risk assessments are initiated, future reports are expected to include risk quantification tied to specific drivers (e.g., fuel supply constraints, weather-driven demand volatility, system flexibility limitations) using probabilistic metrics across operational time

frames, beyond just peak demand hours. These formal energy risk assessments, once fully implemented, are intended to be essential tools for informing strategic planning and operational decisions to ensure resource capacity is available across a broad range of conditions.

ProbA Results

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	143	231	538
NEUE (ppm)	0.60	0.98	2.27
LOLH (hours per Year)	0.09	0.16	0.33
*Provides the 2024 ProbA Results for Comparison			

The ProbA results for the year 2027 indicate some risk for SERC-East in the winter months of January and February. This is in line with the risk findings of previous ProbA studies. The annual EUE is 231.75 MWh but for a very short, expected duration of 0.15 hours. As shown in the 2027 EUE Heat Map below, the risk occurs during winter morning hours around 7:00-8:00 a.m. due to a combination of higher loads and solar resources not yet ramped up. The risk is seen mainly in January but on a smaller scale in the other winter months of February and December. The major contributing weather-years to the EUE in the model are 1982 and 1985, which experienced one of the worst winters throughout the SERC Region, limiting the amount of imports from neighboring subregions.



2027 EUE Heat Map

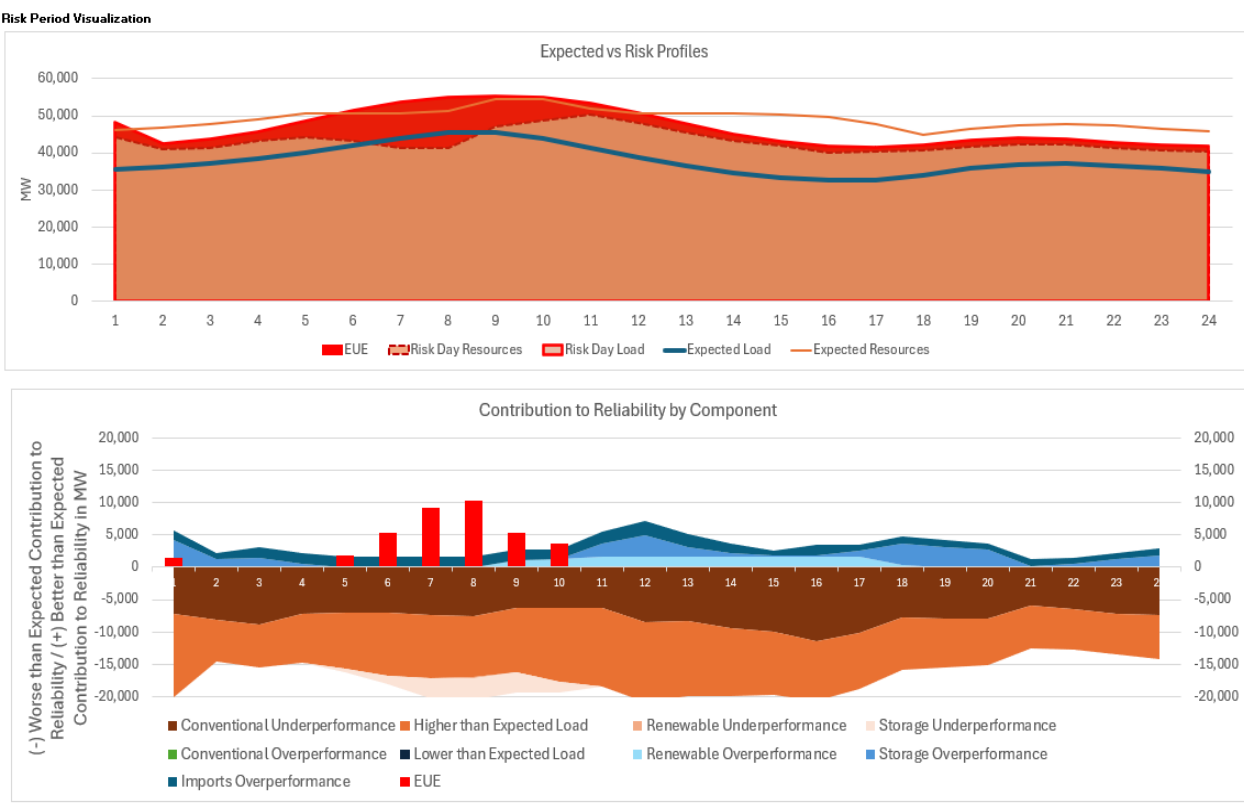
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	0%	1%	7%	23%	41%	9%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	0%	0%	0%	0%	0%	1%	3%	5%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
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7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
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10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	0%	0%	1%	2%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

2029 EUE Heat Map

For the year 2029, SERC-East risk continues to grow with 538.48 MWh of EUE and 0.33 hours of LOLH. As is shown in the 2029 EUE Heat Map above, the trends of risk are similar to the findings of 2027, with risk is expected to occur primarily in January, but other winter months of February and December as well. The expected duration of risk is still very short, occurs around 7:00-8:00 a.m. Load is expected to grow in SERC-East. In 2028, more than 1800 MW of coal is expected to retire. While there are some replacements with battery, solar generation, and DR, they are limited in the winter morning risk hours as seen in the study and contribute to the increase in EUE in 2029.

Between 2027 and 2029, the is an expected addition of 683 MW summer load and 985 MW winter load. In the last stages of the Proba, SERC worked with its entities to identify an error in winter load forecast reporting. We are unable to rerun the model in time for the submission however, we are working with the entities to make the correction to the LTRA. For SERC-East, the overall 2029 winter load forecast should be 1932 MW than is currently reported. The expected risk would be higher along the same trends as is seen in the present study for the year 2029

In the SERC SERVM model, there are 5,375 unique cases. There was not a case for the 1 in 1,000 event or higher probability. The following charts show the expected (typical) vs. risk profiles and the contribution to reliability by component for the study year 2027.

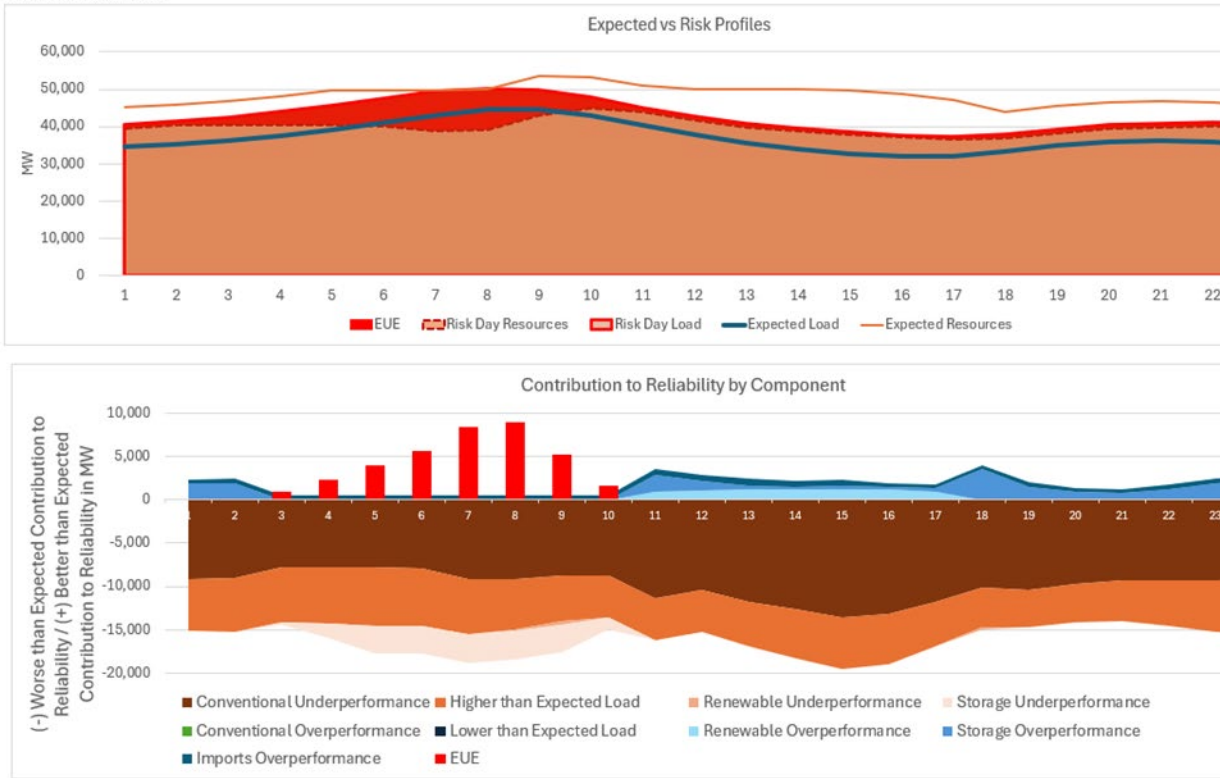


Expected vs. Risk Profiles and Contribution to Reliability by Component

The event day with the worst case EUE hour was chosen for reference (load forecast error +4%, weather year 1985, winter). The chart shows risk during winter morning hours from 4:00-10:00 a.m. and 12:00-1:00 a.m. In this event, the risk is driven by the load forecast higher than expected, unavailability of storage, unavailable or limited solar generation, and some conventional generation on outage. Some imports from neighboring areas are available.

The following charts show the expected (typical) vs. risk profiles and the contribution to reliability by component for the study year 2029. The event day with the worst case EUE hour was chosen for reference (load forecast error +2%, weather year 1985, winter).

Risk Period Visualization



Similar to the 2027 event, there is risk during winter morning hours from 3:00-11:00 a.m. In this event, the risk is driven by the load forecast higher than expected, unavailability of storage, unavailable or limited solar generation, and some conventional generation on outage. While there are some imports from neighboring areas available, it is much lower in this event.

Demand growth and planned generator retirements contribute to growing energy risks. SERC and the SERC East entities will need to continue to monitor the resource adequacy studies.

Demand

The assessment area develops its load forecasts using a combination of short-run and long-run econometric techniques, which are then aggregated into a coincident system peak outlook. One entity uses statistically adjusted end-use (SAE) models for customer classes, supplemented by adjustments for energy-efficiency programs, rooftop solar, and EV forecasts from external consultants. Another entity applies SAE regression for residential and commercial classes, a consultation-based approach

for large industrial customers, and a 50,000-trial stochastic analysis to capture the probability and timing of prospective data center and manufacturing projects. Municipal and wholesale sub-area forecasts are integrated to form the coincident peak, with contracts having defined end dates removed to prevent overstatement of future demand. Load forecast uncertainty (LFU) is addressed through “High” and “Low” scenarios that vary demographic and economic growth, large-load adoption rates, rooftop solar penetration, and EV uptake, driving planning reserve and resource-adequacy sensitivity cases. Since the 2024 LTRA, key refinements include the explicit addition of an EV demand component starting in 2025, more frequent updates for large industrial prospects, and expanded stochastic modeling to capture rising volatility from electrification and BTM generation.

Changes in the 10-year forecasted demand and energy growth rates since the 2024 LTRA are primarily driven by the anticipated addition of large new loads, especially data centers and other industrial facilities. These loads are accounted for via a post-modeling stochastic adjustment from active projects and are a significant driver, contributing approximately 1,100 MW by 2034. Electrification trends, particularly EV adoption, are also included, projected to increase residential and commercial summer peak demand by 33 MW and winter demand by 3 MW by 2034. Rooftop solar is forecast to offset summer demand by 3 MW, with no winter peak impact. Other potential drivers like geographic/demographic shifts, economic outlook, EE (beyond standard modeling), flexible loads, extreme weather, and climate change are currently not considered significant contributors to forecast changes. Beyond the 10-year window, electrification and industrial expansion are expected to continue influencing demand, though uncertainty increases.

Demand-Side Management

DR programs are actively monitored and managed through contractual agreements, control technologies, and performance metrics. DR capacity primarily supports the grid during peak periods, with one entity’s capacity mainly from interruptible loads and customer standby generation based on contracted firm demand. Programs focus on winter peak capacity support with some summer use but do not currently address ancillary services. Recent initiatives include a residential DR program (smart thermostat rewards, peak time rebates, time-of-use education) and a residential DR program with load control switches on HVAC units and water heaters, contributing about 2.3 MW based on industry benchmarks. However, efforts to develop more precise baselines for measuring performance have yielded inconsistent results, especially in winter, leading to continued reliance on industry averages. Plans include piloting a “Bring Your Own Thermostat” initiative and transitioning to smart thermostat and other grid-edge technologies due to limitations of current switch-based programs.

Since the 2024 LTRA, regulatory approvals have expanded incentives for most residential controllable programs (heat strip control, thermostats, water heaters, batteries, except the newer battery program) and increased program coverage. This includes a statewide water heater switch program

launching in 2025, adding November as a winter control month, and enabling year-round water heater control. Emerging technologies like EV batteries, smart panels, home automation, and smart inverters are being monitored for future inclusion. A multi-year initiative has been approved to quantify broader value streams from DR, potentially including energy, regulation, and ancillary services. For non-residential customers, a “Bring Your Own kW” winter load curtailment program is expanding, and two new 2025 programs offer an economic curtailment option and a shorter emergency curtailment program. A planned retirement of one large customer DR program aims to streamline offerings into a unified portfolio called PowerShare.

No major changes have been reported for EE and conservation since the 2024 LTRA, but refinements are being considered. EE impacts are integrated into load forecast models as post-modeling adjustments, reflecting incremental improvements and new program designs. EE is embedded within customer class forecasts and refined through stakeholder input and ongoing evaluation. Looking ahead, increased focus is expected on load-modifying technologies, smart home integration, and more dynamic EE measurement approaches, potentially through real-time metering data or integration with distributed energy resource management systems (DERMS).

Distributed Energy Resources

DERs, particularly BTM solar PV, are anticipated to experience gradual growth within the assessment area over the next 5 and 10 years, although their current penetration levels remain low. Forecasts project residential solar installations to grow by approximately 8% in 2025, tapering slightly to 7% in 2026 and 2027, and then stabilizing around 6% annually thereafter. These projections are informed by local adoption trends, national market dynamics, and regression models that consider economic payback factors such as installation costs, incentives, and bill savings. Historical metering data also shows a recent decline in new BTM installations due to the expiration of DER incentive programs, which influences future projections.

In terms of integration into planning, BTM solar generation is primarily treated as a load modifier, effectively reducing net load through hourly profiles consistent with prior methodologies. Transmission planning similarly incorporates DER generation as a load reduction rather than a supply resource. For generation planning, the capacity value of solar is assessed through ELCC studies due to its intermittent and diurnal nature. Unlike fully dispatchable thermal resources, which are counted at their full nameplate capacity, solar output varies and typically yields minimal output during early morning and late evening winter peak loads. Summer peak loads align better with solar generation, but its capacity contribution still requires careful assessment through ELCC to discount nameplate capacity to firm, dependable capacity to meet LOLE reliability standards.

The system-level impact of current BTM solar on peak demand and load shapes has been minimal, with no significant operational issues identified from existing penetration levels. BTM solar output is projected to represent only 1% to 1.5% of system load over the planning horizons. While no DER-related reliability risks are anticipated for summer 2025, entities are monitoring for potential localized impacts on midday load in areas with higher solar density. Aside from solar PV, no other types of BTM DERs are currently known to materially affect demand-side profiles.

Regarding DER aggregators, there are currently no active or projected aggregators contributing to electricity demand management within the assessment area, and no such capacity is included in forecasts for the next 5 or 10 years. No formal programs are in place to involve DER aggregators in wholesale electricity markets or Integrated Resource Plans, and no virtual power plants operate within the system. While broader grid reliability studies, particularly concerning IBRs, have been conducted through collaborations like the Eastern Interconnection Planning Collaborative, these efforts have not yet extended to DER aggregation. However, if DER aggregator participation increases in the future, planning practices will be adjusted accordingly.

Since the 2024 LTRA, there have been no major modifications to DER monitoring or modeling methods. However, future updates aim to distinguish between solar-only and solar-plus-storage DERs. Load forecast uncertainty (LFU) scenarios do account for rooftop solar penetration and BTM generation, reflecting the rising volatility introduced by electrification.

Generation

Generation planning and management within the assessment area involve a comprehensive set of studies and strategies to ensure reliability amidst an evolving resource mix and increasing load growth.

Overall Planning and Resource Mix Evolution

Entities in the assessment area conduct extensive reliability studies as part of their resource planning, including resource adequacy and LOLE studies, typically targeting a reliability standard of no more than 1 day in 10 years. These studies inform integrated resource planning (IRP) processes, which evaluate new generation scenarios and resource transitions.

The resource mix is undergoing significant changes, driven by the following:

- **Retirements:** Approximately 5,800 MW of coal generation is slated for retirement over the next decade. However, these retirements are contingent on securing sufficient replacement capacity to maintain reliability and a target winter reserve margin. For instance, Roxboro units are expected to retire 1,156 MW by 2028 and 1,402 MW by 2033, and Mayo 763 MW by 2030, all dependent on replacement capacity being online. Planning entities proactively manage

these risks through transmission impact studies and will delay retirements if replacement resources are not operational.

- **New Additions:** To meet growing demand and replace retiring capacity, IRPs identify substantial new resources through 2035. These include thousands of megawatts of solar, battery storage, wind, combustion turbines (CT), combined cycle (CC) units, and small modular nuclear reactors (SMR). Some entities are also replacing coal-fired generation with natural gas combined-cycle (NGCC) units to introduce more flexible, dual-fuel generation that supports VER integration.
- **Load Growth:** Significant winter load growth of around 2% annually is projected between 2025/2026 and 2034/2035, increasing winter peak demand by approximately 6,500 MW. This growth is primarily driven by the anticipated addition of large new loads, especially data centers and other industrial facilities. These high-load, high-duty-factor customers require resource portfolios capable of sustaining elevated energy demand beyond typical seasonal peaks.

Capacity Valuation and Reliability

For resource adequacy, entities determine PRMs to meet reliability standards.

Capacity Contribution Values: Capacity contributions for different generation types are assigned using a mix of historical performance data and model-based simulations:

- **Variable Energy Resources (VER):** For intermittent resources like solar, onshore wind, offshore wind, and storage, ELCC studies are essential. ELCC studies discount the nameplate capacity of VERs to determine their firm, dependable capacity to meet LOLE reliability standards. Solar output varies and often yields minimal output during early morning and late evening winter peak loads, though summer peak loads align better with solar generation. ELCC values for solar and battery storage are typically updated every three years.
- **Thermal Resources:** Non-solar, wind, and storage resources, such as thermal units, are generally counted at their full nameplate capacity.
- **Hydro Resources:** For hydro-only entities, capacity contributions are based on hydro capacity and remain stable.

Reserve Margins: Reserve margins are generally expected to remain above reference levels over the next five years, indicating no immediate system-wide resource adequacy concerns. One entity, however, anticipates potential reserve margin challenges starting in Winter 2027 due to significant new load additions and has increased its winter reference PRM from 12% to 18%. Another entity plans to adopt a 22% winter reserve margin by 2031.

Operational Considerations

Planning activities are actively underway to address potential operational issues from the evolving resource mix:

- **Ramping Needs:** Planning entities estimate ancillary service needs, such as regulation, balancing, and contingency reserves, to ensure operational reliability amid high penetrations of VERs. While some entities with hydro-based or dispatchable, fast-ramping units have no immediate ramping concerns, and others conduct triennial integration studies aligned with their IRPs to assess the system's ability to integrate intermittent generation.
- **Inertia and Stability:** Stability assessments are conducted as part of TPL-001 compliance and interconnection cluster studies. These studies account for new generators and evaluate the growing share of VERs. Results thus far have not revealed significant stability concerns. If a weaker area with lower inertia is identified, further analysis like EMT modeling may be conducted, and adjustments to IBR performance settings or transmission system upgrades are considered.
- **IBRs:** As solar PV integration grows, interconnection studies now mandate the use of EMT models to evaluate IBR performance during disturbances, addressing issues like momentary cessation and fault ride-through. These studies ensure inverter settings comply with NERC standards (e.g., PRC-024) and FERC Order 827. Efforts focus on maintaining network reliability and system stability. While no new ancillary service needs have emerged in the near five-year horizon, entities are considering adopting IEEE 2800 standards.
- **Natural Gas Fuel Supply Risk:** Planning entities have implemented measures to mitigate risks from natural gas fuel supply disruptions, especially during extreme weather. All natural-gas-fired combined cycle and simple cycle units have dual-fuel capability or firm gas transportation contracts. Future resource planning assumes on-site backup fuel or dual-fuel capability. Long-term studies factor in fuel supply constraints and infrastructure bottlenecks.

Energy Storage

Energy storage (ES) systems, particularly BESS, are anticipated to see significant capacity installations over the coming decade.

Purpose: Much of the planned BESS will be paired with solar facilities to store excess solar generation and enhance system flexibility. The region also operates substantial pumped hydro storage, used to meet load economically and manage generation ramping requirements.

Integration: Energy storage projects are evaluated through generator interconnection studies, modeling both charging and discharging behaviors. Both standalone and hybrid (paired with renewable generation) storage systems are planned for deployment.

Modeling: BESS are modeled assuming a four-hour discharge duration, with capacity contributions varying based on system conditions and resource mix. Hybrid and standalone battery systems are evaluated using ELCC to capture their effective capacity contribution during peak demand periods.

Capacity Transfers

Energy transfer needs and capabilities are undergoing changes, primarily driven by anticipated load growth and the potential retirement of generation resources.

While one generation-only BA does not foresee any changes to its transfer capabilities, other entities acknowledge that the potential retirement of coal plants could constrain transfer capability. To address these potential constraints, new transmission projects are being evaluated and planned. In response to increasing load demands, particularly within specific BAs, multiple active transmission projects are underway to enhance near-term transfer capabilities. Firm transmission service contracts have been secured to support future transfer needs tied to generator retirements, indicating a reliance on these transfers to maintain reliability. Long-term transmission and resource adequacy planning efforts, including IRPs and coordination with neighboring utilities, are ongoing to ensure the region maintains sufficient capacity and transfer reliability. Planning entities model projected resource additions and retirements and incorporate these into transmission models to identify and address any negative impacts through reliability assessments. Long-term firm imports have been requested from neighboring regions to assess whether external capacity transfers might be more cost-effective than developing new local resources, highlighting a consideration for reliance on external capacity for reliability and economic reasons. Potential organizational changes, such as merging BAs, are also being modeled and assessed to ensure system reliability is maintained.

Transmission

Major transmission projects are identified through annual planning assessments to support and maintain system reliability. These projects include new transmission lines (including HVdc), reconductor projects, and power electronic devices like static var compensators (SVC). For instance, a new 230 kV line and synchronous condensers are planned to improve reliability and reduce congestion in coastal areas, and an additional circuit in South Carolina will address low-country congestion. Transmission limitations and constrained areas are identified through annual assessments, but no widespread transmission-constrained areas have been identified in recent planning studies. However, an operating guide exists to manage potential overloads on a specific transmission line. Interconnection study processes are crucial for detecting and resolving potential

constraints before new generation is brought online, which helps prevent congestion during real-time operations. Since the 2024 LTRA, there have not been major changes to transmission planning processes, but entities are actively responding to evolving regulatory requirements, such as FERC Order No. 2023. This includes developing new processes for interconnection heat maps, implementing updated interconnection and affected system processes (including cluster studies), and evaluating grid-enhancing technologies (GET). A business practice is being developed to formalize how GETs will be assessed in both transmission planning and interconnection analyses.

In summary, capacity transfers are important for reliability in this assessment area. System adequacy is maintained through proactive planning for new transmission projects, securing firm transfer contracts, evaluating external imports, and continually refining planning processes to accommodate evolving load and resource dynamics.

Reliability Issues

Entities in East have identified several key reliability issues primarily stemming from projected load growth, an evolving resource mix, and critical infrastructure interdependencies. These challenges necessitate proactive planning and operational adjustments to maintain BPS reliability.

Firstly, large, new load additions, particularly data centers and other industrial facilities, are the primary drivers of significant changes in the 10-year forecasted demand and energy growth rates. These high-load, high-duty-factor customers could strain both generation and transmission resources if not adequately planned for. One entity anticipates potential reserve margin challenges starting in Winter 2027 due to these significant new load additions and is proactively issuing requests for proposals for new capacity resources. All substantial new loads are subjected to interconnection studies to assess their reliability impacts and determine necessary transmission upgrades.

Secondly, the management of generator retirements and the assurance of sufficient replacement capacity pose a significant reliability concern. Approximately 5,800 MW of coal generation is slated for retirement over the next decade. However, these retirements are strictly contingent on securing firm replacement capacity to maintain reliability and meet a target winter reserve margin (e.g., 22%). If firm replacement resources are not in place, coal retirements would be deferred to preserve system reliability. Planning entities actively manage these risks by conducting thorough transmission impact studies to evaluate the effects of retirements on system reliability and to determine required transmission upgrades and replacement generation before allowing retirements to proceed.

Thirdly, the evolving interdependencies with other critical infrastructure sectors, especially natural gas fuel supply, are a major reliability issue, particularly during extreme weather conditions. The risk to BPS reliability from natural gas generator fuel supply issues, such as production or transportation

curtailments, is a recognized concern. Mitigation measures include ensuring that natural-gas-fired combined-cycle and simple cycle units have dual-fuel capability or firm gas transportation contracts. Coordination protocols exist between electric and natural gas operators for both routine operations and emergency response, including maintaining electric service to critical gas infrastructure like compressor stations. Long-term studies also factor in fuel supply constraints and infrastructure bottlenecks, drawing insights from past events.

Fourthly, the operational impacts of the changing resource mix, particularly the increasing penetration of VERs and IBRs, are actively being addressed. Stability assessments are routinely conducted as part of TPL-001 compliance and interconnection cluster studies to evaluate inertia and transmission stability. While results so far have not revealed significant stability concerns, further analysis, such as EMT modeling, may be conducted in identified weaker areas with lower inertia. Interconnection studies for IBRs now mandate the use of EMT models to evaluate their performance during disturbances (e.g., momentary cessation, fault ride-through) and ensure compliance with NERC standards and FERC Order 827. Additionally, ensuring sufficient flexible resources are available to meet expected system ramping needs is a key planning consideration, with triennial integration studies assessing the system's ability to integrate intermittent generation.

Finally, one entity highlighted that its southern system, which is closely interconnected with neighboring utilities, may face import constraints during the spring and fall shoulder seasons when generation outages are common. To mitigate this, the entity proactively coordinates major generation outages with neighboring utilities and prioritizes reliance on internal generation rather than market purchases during these vulnerable periods. For extreme cold weather, a specific temperature threshold triggers the inclusion of additional operational reserves in its planning process, supported by enhanced forecasting tools. While no widespread transmission-constrained areas have been identified in recent planning studies, new transmission projects are being evaluated and planned to enhance transfer capabilities in response to increasing load demands and potential coal plant retirements, indicating ongoing efforts to prevent future transmission-related reliability issues.

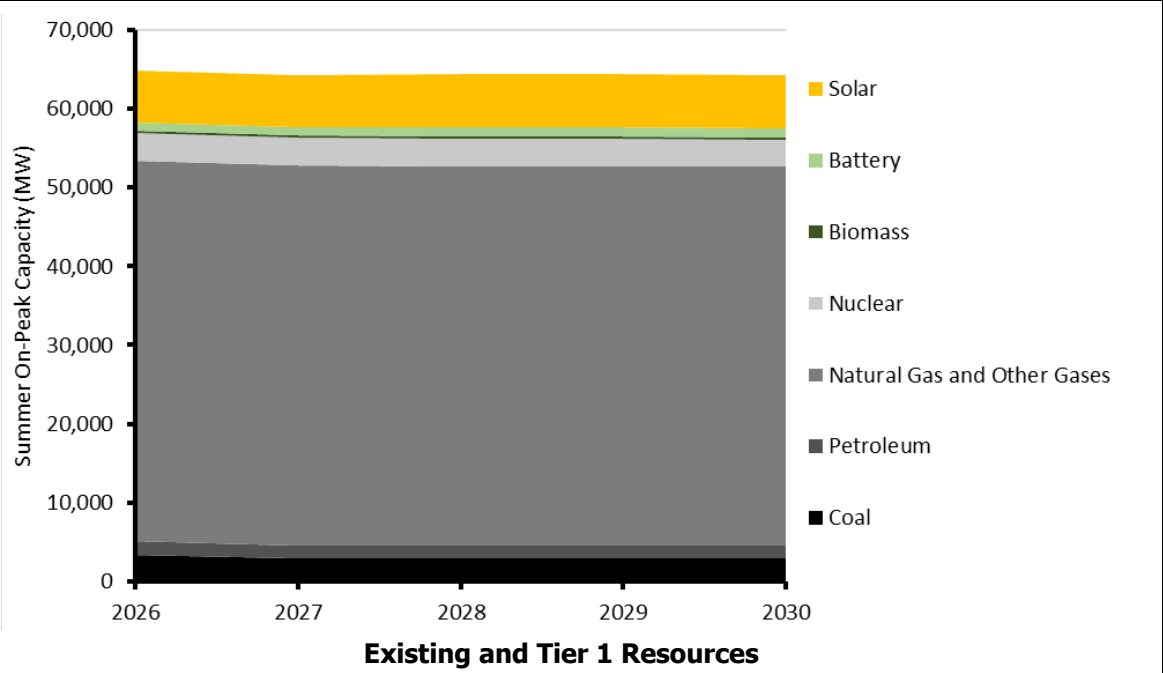
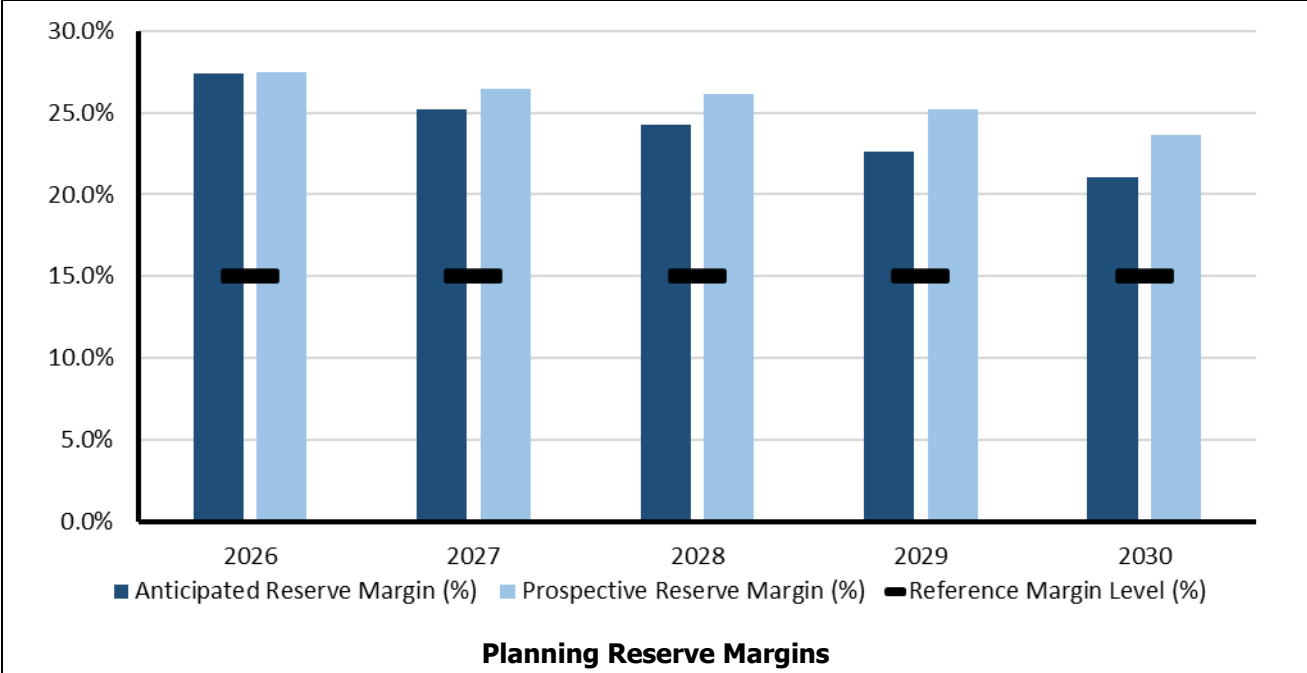


SERC-Florida Peninsula

SERC-Florida Peninsula is a summer-peaking assessment area within SERC. SERC is one of the six companies across North America that are responsible for the work under FERC-approved delegation agreements with NERC. SERC is specifically responsible for the reliability and security of the electric grid across the Southeastern and Central areas of the United States. This area covers approximately 630,000 square miles and serves a population of more than 91 million. The SERC Regional Entity includes 36 BAs, 28 Planning Authorities, and 6 Reliability Coordinators.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	54,477	54,933	55,377	56,099	56,666	57,414	58,267	58,972	59,724	60,415
Demand Response	3,345	3,345	3,357	3,360	3,368	3,379	3,388	3,400	3,412	3,418
Net Internal Demand	51,132	51,588	52,020	52,739	53,298	54,035	54,879	55,572	56,312	56,997
Additions: Tier 1	754	800	997	1,000	1,001	1,801	1,801	1,802	1,803	1,803
Additions: Tier 2	32	620	962	1,375	1,375	1,375	1,375	1,375	1,375	1,375
Additions: Tier 3	0	0	0	0	0	0	0	0	0	0
Net Firm Capacity Transfers	293	293	200	200	200	200	200	200	200	200
Existing-Certain and Net Firm Transfers	64,393	63,795	63,659	63,659	63,525	63,001	62,966	62,966	62,966	62,966
Anticipated Reserve Margin (%)	27.4%	25.2%	24.3%	22.6%	21.1%	19.9%	18.0%	16.5%	15.0%	13.6%
Prospective Reserve Margin (%)	27.5%	26.4%	26.2%	25.2%	23.7%	22.5%	20.5%	19.0%	17.5%	16.1%
Reference Margin Level (%)	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%



SERC-Florida Peninsula Highlights

- SERC-Florida Peninsula’s ARM falls below the RML during the 2035 time frame.
- SERC-Florida Peninsula’s ProbA results for the study years 2027 and 2029 indicate a normal level of risk.

SERC-Florida Peninsula Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	3,361	2,902	2,902	2,902	2,902
Coal*	3,346	2,418	2,418	2,418	2,418
Petroleum	1,795	1,667	1,667	1,667	1,667
Petroleum*	1,768	1,459	1,459	1,459	1,459
Natural Gas	48,214	48,202	48,159	48,159	48,025
Biomass	310	310	310	310	310
Solar	6,666	6,712	6,814	6,817	6,818
Nuclear	3,502	3,502	3,502	3,502	3,502
Battery	1,000	1,000	1,095	1,095	1,095
Total MW	64,849	64,297	64,450	64,453	64,321
Total MW*	64,806	63,604	63,757	63,760	63,628
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to be included in system plans are removed from the resource projection where marked.					

Planning Reserve Margins

The Florida Peninsula subregion annually assesses its PRMs to ensure the regional total reserve margin (TRM) requirement is met over a 10-year projected period, considering summer and winter peak loads, generating resources, and firm DSM resources. The State of Florida’s Public Service Commission (FPSC) reliability criterion of a 15% reserve margin serves as the general TRM for entities in the subregion. Notably, investor-owned utilities (IOU) in the subregion voluntarily maintain a higher 20% reserve margin, which also functions as their RML based on firm load. These subregional TRM calculations incorporate merchant plant capacity that is under firm contract to load-serving entities.

Currently, the ARM for the Florida Peninsula subregion is projected to remain above the RML throughout the entire assessment period, indicating no present concerns regarding resource adequacy due to reserve margin deficiencies. Specifically, the projected Regional TRM is above the NERC RML of 15%, and Florida Peninsula subregion reserve margins are anticipated to stay at or above 20% for all summer and winter seasons during the assessment period. This healthy reserve level, coupled with excess import capability, means that the subregion does not foresee changes to its energy transfer needs or capabilities.

Probabilistic analyses confirm that the Florida Peninsula subregion continues to operate below this 0.1 loss of load probability (LOLP) standard. The methods used to calculate the Florida Peninsula RML have remained consistent since the prior LTRA. While individual planners account for uncertainty and variability before submitting their data, which is then aggregated, energy adequacy concerns are not directly addressed within the immediate calculation of ARM/RML. Instead, energy adequacy is reviewed through a biennial Loss of Load Probability Study, which assesses all hours of the year, as well as through transmission and fuel reliability study work. Although no formal changes have been made to existing resource adequacy planning or procurement processes since the 2024 LTRA, the Florida Reliability Coordinating Council (FRCC) and individual entities are actively considering enhancements, particularly focusing on the increasing penetration of IBRs to ensure sufficient dispatchable generation for potential energy assurance concerns. The FRCC is also continuing to develop its analysis of the 24-hour load and resource outlook around peak days to better understand the impact of increased solar penetration and energy storage charging/discharging on ARM/RML.

Non-Peak Hour Risk, Energy Assurance, Probabilistic-Based Assessments

The Florida Peninsula Subregion undertakes energy risk assessments to understand its ability to meet uncertain forecasted system demand, particularly as traditional resource adequacy approaches face shortcomings with increasing variability. These assessments are primarily conducted through biennial loss-of-load probabilistic (LOLP) assessments, which are distinct from NERC’s ProbA and are designed to assess energy adequacy across every hour of a five-year study period, rather than solely focusing on seasonal peaks. Inputs for these studies include projected generating unit information (current and future capacity), seasonal demand values, projected DR availability, generation maintenance schedules, and Forced Outage Rates (FOR). The FRCC utilizes Astrapé’s SERVVM Software for multiple base case and sensitivity LOLP studies, with scenarios often examining conditions like no firm import availability, no DR availability, or a 90/10 load case.

These assessments review a 24-hour load and resource outlook centered around the peak day for both the summer and winter seasons. This effort helps entities fully comprehend the impact of increasing solar penetration levels and energy storage charging/discharging across all hours on the ARM and RML. The analysis has indicated no expected hours of shortfall in adequacy through 2034, though it has observed that increasing solar levels tend to shift the hours of thinnest reserve margins in the summer to later in the day (specifically, HE 18–19).

The FL-Peninsula subregion assesses system adequacy against the industry standard metric of 0.1 LOLP, which equates to approximately one event every 10 years, and currently remains under this standard. Although no significant adequacy impacts have been identified for off-peak hours and shoulder periods, the subregion entities are continuously working to improve their probabilistic analysis methodologies and enhance the robustness of their assessments for these periods. The results of these energy risk assessments are foundational for proactive planning, risk mitigation, and regulatory compliance, guiding long-term strategic decisions like infrastructure development and resource procurement, as well as short-term operational preparedness. The FRCC and its members are also actively considering enhancements to these processes, particularly focusing on the increasing penetration of inverter-based resources (IBR) to ensure sufficient dispatchable generation for potential energy assurance concerns.

ProbA Results

Based on the data and assumptions of SERC’s ProbA model, SERC-Florida Peninsula does not show any loss of load in 2027. For 2029, the annual, probability weighted risk is 0.094 MWh and the LOLH is 0.0001 hours. This is summarized in the table below.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	2	0	0.094
NEUE (ppm)	0.01	0.00	0.00
LOLH (hours per Year)	0.01	0.00	0.00
* Provides the 2024 ProbA Results for Comparison			

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
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10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

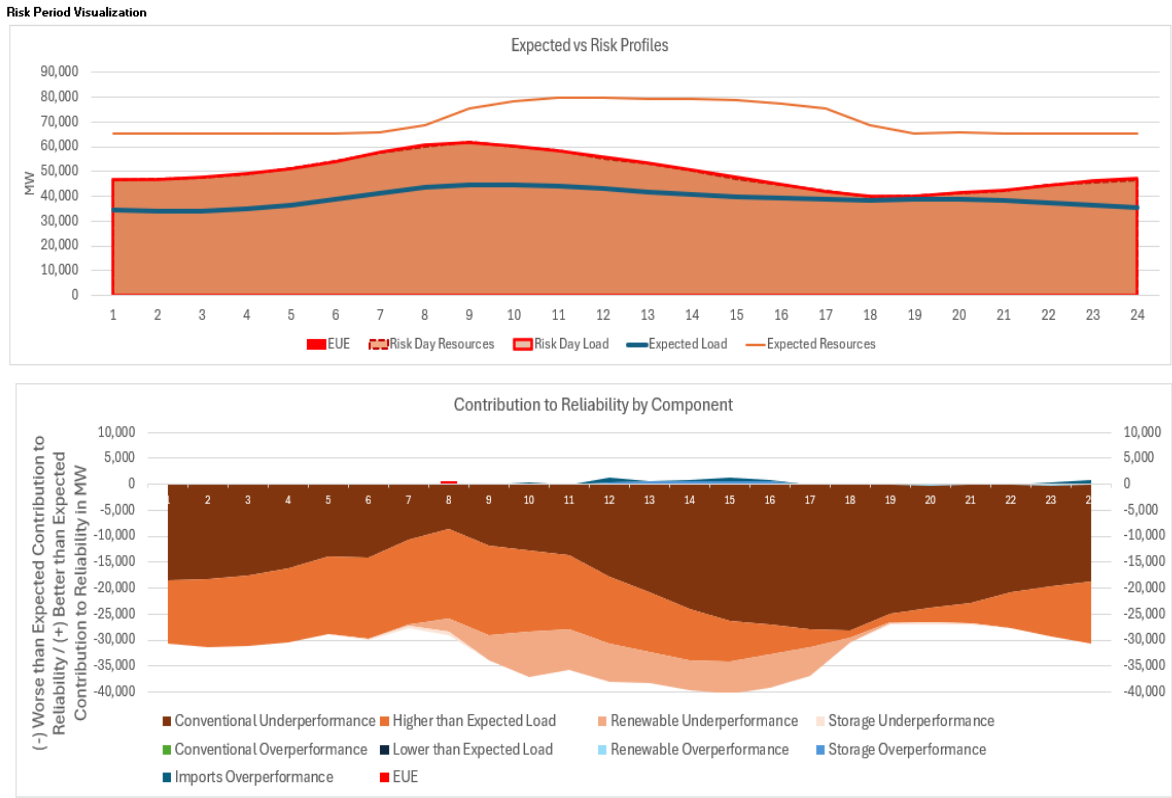
2027 EUE Heat Map

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

2029 EUE Heat Map

As seen above, the 2027 EUE heat map does not show any risk hours. For study year 2029, there is only one out of 5,375 cases that show risk, which is for a load forecast error of +4%, and weather years 1985 which was an extreme winter year. For that one case, SERC-Florida Peninsula shows an EUE of 720 MWh, with all the risk in December at 7:00-8:00 a.m.

In the SERC SERVVM model, there are 5,375 unique cases. There was not a case for the 1 in 1,000 event or higher probability. Figures below show the expected (typical) vs. risk profiles and the contribution to reliability by component for the study year 2029 show event details for one risk event for 2029.



Expected vs. Risk Profiles and Contribution to Reliability by Component

Above, the event day as higher than expected load (extreme winter 1985, 4% load forecast error) and resources available are less than expected. The above shows the risk hour to be between 7:00-8:00 a.m. when solar generation is limited, storage and imports are limited. There is some conventional generation on outage.

SERC-Florida Peninsula is also seeing load growth, with an addition of 1,551 MW winter load and 1,146 MW summer load between 2027 and 2029. While the subregion continues to add solar generation, this study indicates that it would not help alleviate risk in cases of extreme winter mornings when solar generation would be very limited.

With the heavy dependence on natural gas in the SERC-Florida Peninsula subregion, fuel diversity could become an area of future concern. Entities in FL-Peninsula have reported a high number of dual-fuel units to mitigate potential disruptions in the natural gas pipelines. Additionally, a new gas pipeline and connection hubs were constructed in the past few years to provide additional gas to the SERC-Florida Peninsula units. The growing penetration of renewable energy means that SERC and the SERC-Florida Peninsula entities will need to continue to monitor the resource adequacy studies and the impact that renewable resources will have. As solar generation continues to grow, the need to ensure the availability of quick start generating units to meet the ramp in demand will increase.

Demand

The Florida Peninsula subregion’s approach to demand forecasting involves individual entities developing their own load forecasts, which are then aggregated by the FRCC to calculate a non-coincident seasonal peak for the subregion. These individual entities annually adjust their forecasts to account for factors such as actual peak demands, updated economic outlooks, population growth, weather patterns, conservation and EE efforts, and electric appliance usage patterns.

The net energy for load (NEL) as well as summer and winter peak demands are forecasted to grow, with the current average annual growth rate for NEL at 1.1% per year, and firm summer and winter peak demand growth expected to increase to 1.34% and 1.45%, respectively, implying a declining trend for the regional load factor. While some larger utilities account for load profile modifiers like DERs and EVs, smaller utilities either lack sufficient data or deem their current impacts as minimal. The penetration of dependable ac solar capacity and EVs is currently low but expected to grow steadily. LFU is assessed at the individual entity level but is incorporated in FRCC and SERC probabilistic analyses for determining potential Loss-of-Load metrics, though not at the subregional level for Total Demand calculation.

Overall, demand and energy growth rates are projected to increase slightly (between 0.15% and 0.3%) compared to the previous LTRA, driven by population growth, economic performance, electricity prices, changing technology and consumption patterns, and more-efficient building codes. Higher-than-normal temperatures have played a noticeable role in higher average consumption per customer. The impact of data centers or similar large loads is currently minimal and not anticipated to create reliability concerns within the planning horizon, and insights beyond the 10-year forecast are not provided.

Demand-Side Management

DSM programs, controllable and dispatchable DR programs within the Florida Peninsula subregion are treated as a load modifier, projected to remain constant at approximately 6% of the summer and winter total peak demands throughout the assessment period. Each reporting entity independently

develops its forecast of firm controllable and dispatchable DR values based on their specific methodologies and program policies, with the FRCC aggregating these impacts for regional analytical purposes. In addition to utility-sponsored EE programs, many utilities also include forecasts of EE associated with the impact from governmental codes and standards. Trends in both utility-sponsored EE and EE from governmental codes and standards remain consistent with prior years, and no modifications have been made to these methods or assumptions since the previous LTRA. Looking forward over the next 10 years, while no changes to how EE and conservation are measured or accounted for have been implemented since the 2024 LTRA, enhancements are actively being considered. These considerations include improved hourly granularity, standardized methodologies, advanced measurement and verification techniques, and better integration of EE into long-term resource planning to support system reliability amidst growing energy demands and increasing renewable integration.

Distributed Energy Resources

The Florida Peninsula subregion systematically monitors and integrates DERs into its planning processes, primarily focusing on BTM solar PV as the most significant type of DER currently identified.

Penetration and Trends: The FRCC conducts an annual collection of DER data across its membership, as reflected in the Load and Resource Plan. While DER penetration levels, particularly for private dependable ac solar capacity and EVs, are currently relatively low, they are forecast to increase steadily over the planning horizon. This includes observed and anticipated year-over-year increases in BTM PV penetration, though these levels remain low compared to the total demand of the Florida Peninsula subregion.

Accounting and Integration in Planning: Entities within the subregion utilize NERC-published definitions for DERs. In general, DERs are modeled as being netted out with the actual customer demand, as their impacts are implicitly accounted for within the load forecasts developed by individual entities. Some larger utilities specifically account for DERs and EVs as load profile modifiers in their forecasts.

Monitoring and Studies: The FRCC’s Load Forecast Working Group (LFWG) meets annually to monitor trends in demand sensitivities related to DERs and coordinates on best practices. Additionally, resource planning, transmission planning, and stability analysis subcommittees annually review DER penetration levels to assess whether further study work or sensitivities are required.

Challenges and Reliability Impacts: No additional challenges or significant operational issues have been identified by PCs and Transmission Planners in the assessment area stemming from increased

DER penetration levels at this time. The subregion has not identified any significant BTM resources other than solar PV.

DER Aggregators: Currently, the FRCC and its members do not collect additional data from third-party DER aggregators beyond what is already included in the members’ integrated resource plans via their annual data collection process.

Generation

The Florida Peninsula subregion is actively managing its generation fleet to maintain reliability amidst an evolving resource mix, with a particular focus on the increasing integration of IBRs like solar and battery installations, and its continued reliance on natural gas.

Here are the key details regarding generation in the subregion:

- Changing Resource Mix and Operational Considerations:
 - While no significant operational issues have been identified at this time due to the changing resource mix, FRCC subcommittees and working groups are collaboratively learning about potential operational considerations associated with increased IBR penetration levels (solar and battery installations).
 - The FRCC Operating Committee (OC) monitors actual output of solar units and tracks how much additional solar capacity will be online within the next 18 months, discussing any operational issues at monthly meetings.
 - Transmission planning studies, including short-circuit ratios and transient stability analyses, have been conducted to assess the performance of existing and planned IBR installations. These studies indicate that the FRCC system is anticipated to maintain reliable stability performance under expected IBR penetration levels in the five-year planning horizon, with no TPL performance issues identified.
 - Additional study sensitivities include light load conditions with solar modeled at projected output and system strength evaluations.
 - IBR performance issue risks are not considered significant in the near term for the assessment area relative to synchronous capacity.
 - The FRCC Planning Committee reviews IBR interconnection studies to ensure transmission system reliability.
- Natural Gas Reliance and Fuel Supply Risk

- The Florida Peninsula subregion is not expecting any long-term reliability impacts resulting from an increased reliance on natural gas-fired generation.
- The Fuel Reliability Working Group (FRWG) and Resource Subcommittee (RS) periodically study current and projected natural-gas-fired generation levels, including analyses of long-term infrastructure requirements, potential loss of compressor stations, availability of alternate fuel, and extreme weather analyses.
- Entities in the subregion do not anticipate natural gas supply issues to create reliability risk.
- Members are projected to hold the vast majority (approximately 90%) of firm pipeline capacity delivering into Florida, supporting increasing gas generation requirements.
- In the event of a short-term failure of gas delivery infrastructure, there is sufficient back-up fuel capability to meet projected demand. Approximately 55–57% of natural gas generation has alternate fuel capability.
- Communication protocols include fuel data status reporting by Operating Entities (OE) to the FRCC State Capacity Emergency Coordinator (SCEC) and FRCC RC during threats to fuel availability, integrating this data into enhanced daily capacity assessments.

Net Demand Ramping

No entity has identified any potential issues with net demand ramping within the 10-year planning horizon, as sufficient flexible resources are available. Potential ramping changes are not seen as emerging given current IBR penetration levels and the availability of dispatchable resources. FRCC planning and operating subcommittees plan to further evaluate aggregate system ramping needs over the next few years.

Capacity Contribution Values

Estimates for VERs, including wind, solar, and hydro, and energy storage, are determined by individual members based on actual performance of existing resources and projected performance using industry standard modeling tools (e.g., PVsyst).

Generator Retirements

Confirmed retirements are incorporated into the *Load and Resource Reliability Assessment Report*, while unconfirmed retirements are not tracked. Retirement decisions are made by each entity based on factors such as unit end of lifespan, operating costs vs. new alternatives, environmental regulations, and local sustainability targets. The subregion is not anticipating any negative impacts on reliability from retirements. Confirmed retirements projected have decreased from approximately 3,400 MW in the prior LTRA to 2,150 MW in the current analysis. Entities analyze projected resource

needs in their annual 10-year site plans (TYSP), which include planned retirements and new generation facilities.

Energy Storage

ES is increasingly being integrated into the planning processes within the Florida Peninsula subregion, with methodologies continuously evolving as entities gain more experience in their planning and operation. While entities are modifying their planning processes based on this accumulating experience, no significant modifications have been made to the core VER methods or assumptions, which include ES, since the previous LTRA.

For deterministic analyses, energy storage units are anticipated to be available to provide energy at the time of peak at their full capacity, effectively contributing to peak capacity. However, for probabilistic analyses and energy adequacy assessments, entities are continuing to discuss methodologies to incorporate supply duration and charging time to better reflect the resource's characteristics over time. The FRCC's biennial loss-of-load probabilistic assessments, which review every hour of a five-year study period, help assess energy adequacy and can include considerations for ES.

The impact of energy storage on system adequacy is also evaluated through the FRCC's "2x24 Hour Analysis." This analysis reviews the 24-hour load and resource outlook, helping entities understand more completely the impact of increased solar penetration levels and energy storage charging and discharging across all hours of the peak days on the ARM and RML. This detailed hourly assessment helps observe how ES operations influence system adequacy throughout the day and has indicated no expected hours of shortfall through 2034.

The capacity contribution values for energy storage are determined by individual members, generally based on a combination of actual performance of existing resources and projected performance using industry standard modeling tools. The basis for the percentage capacity contribution considers the nameplate rating of each facility.

Energy storage installations, particularly battery installations, are considered alongside other IBRs. FRCC subcommittees and working groups are collaboratively learning about potential operational considerations associated with increased IBR penetration levels, including these battery installations. The FRCC Planning Committee reviews IBR interconnection studies to ensure transmission system reliability.

Currently, PCs and Transmission Planners in the assessment area have not identified any additional challenges or significant operational issues specifically stemming from increased DER penetration levels, including ES.

Capacity Transfers

In the Florida Peninsula subregion, capacity transfers primarily refer to anticipated firm import and export values with neighboring assessment areas, particularly the Southern Balancing Authority. While these transfers are an integral part of regional planning, Florida is generally not reliant on external capacity transfers for its core reliability, due to its robust internal generation and healthy reserve margins.

The FRCC Load and Resource Plan (LRP) annually incorporates anticipated firm import and export values reported by member utilities. Recent projections indicate a decline in firm imports for the region over the past few years.

To ensure effective capacity transfers and assess their sufficiency, the Florida–Southern Interface owners conduct an annual transfer capability assessment. This assessment determines the available transfer capability between Peninsular Florida and the Southern Balancing Authority and between the Southern Balancing Authority and FPL Northwest. The results of the most recent analysis project that the interface capability is sufficient to meet anticipated firm import needs.

Transmission

The Florida Peninsula subregion has not identified any specific major transmission projects that impact or are needed to maintain reliability during the planning horizon that are not already identified in the Annual Regional Plan. The individual entities have planned projects that are primarily related to system expansion in order to serve their forecasted growing demand and resource integration and to ensure long-term reliability (beyond the planning horizon). At this time, there have been no changes made to the transmission planning process since last year’s reporting.

Reliability Issues

The Florida Peninsula subregion generally maintains a strong reliability outlook, with no other significant emerging reliability issues identified at this time. The ARM is expected to remain above the RML throughout the entire assessment period, meaning there are no current concerns regarding resource adequacy related to reserve margin deficiencies and thus no reliance on Tier 2 resources or supplemental options. Similarly, no potential issues with net demand ramping have been identified within the 10-year planning horizon, and no additional challenges from increased penetration levels of DERs have been identified by PCs and Transmission Planners. Large industrial or commercial load additions, such as data centers, are not anticipated to create reliability risk in the subregion, nor have

any transmission-constrained areas been identified in planning studies. The subregion is also not reliant on external capacity transfers for its core reliability due to robust internal generation and healthy reserve margins.

Even though the Florida Peninsula subregion is not projecting any significant emerging reliability issues, there are areas that the assessment area continues to monitor closely and actively consider for future enhancements or reassessments, indicating underlying risks or concerns that could impact long-term reliability:

- **Increasing Penetration of IBRs and Associated Energy Assurance/Operational Flexibility Concerns:** Although IBR performance issues are “not considered significant in the near-term” for the Florida assessment area at current penetration levels, the increasing integration of IBRs (such as solar and battery installations) is a “key area of focus.”

- **Risks of Extreme Weather:** While the Florida-specific energy risk assessments note “no expected hours of shortfall,” scenario cases are run that include altered projected load to reflect extreme conditions (e.g., a 90/10 case), demonstrating an awareness of these potential risks.
- **Dependency on Natural Gas as a Fuel Resource:** Despite that Florida does not anticipate any natural gas supply issues that may create risk to reliability and has developed robust mitigation strategies (such as holding approximately 90% of firm pipeline capacity and having 55%–57% of natural gas generation with alternate fuel capability), the area’s “dependency on natural gas as a fuel resource” is still factor where possible impacts on the long-term reliability of the BES are continuously monitored.

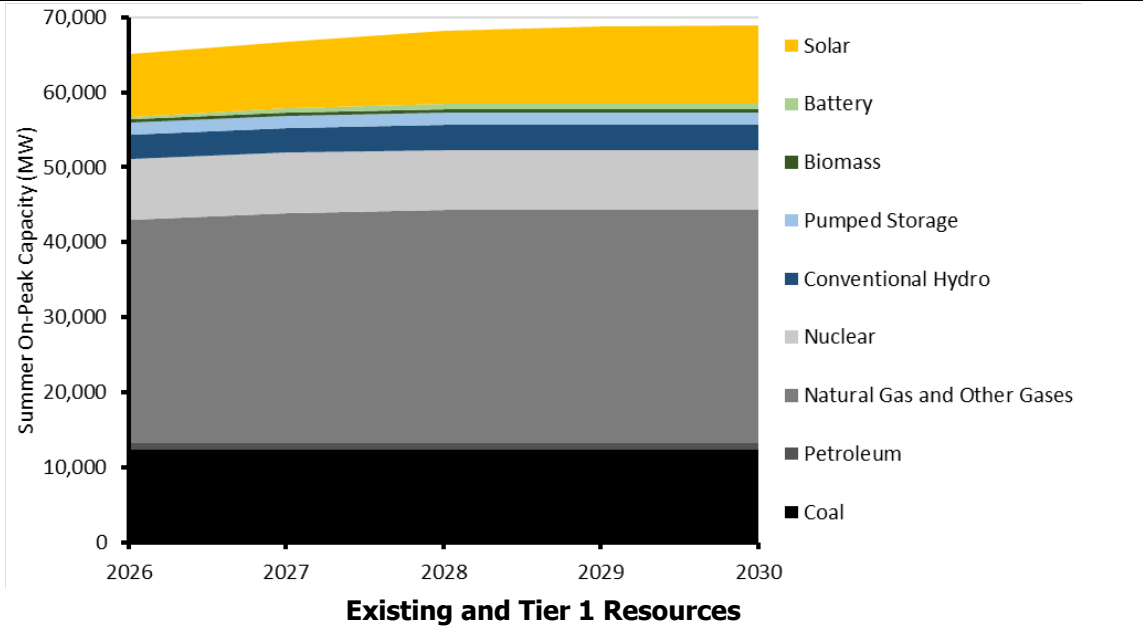
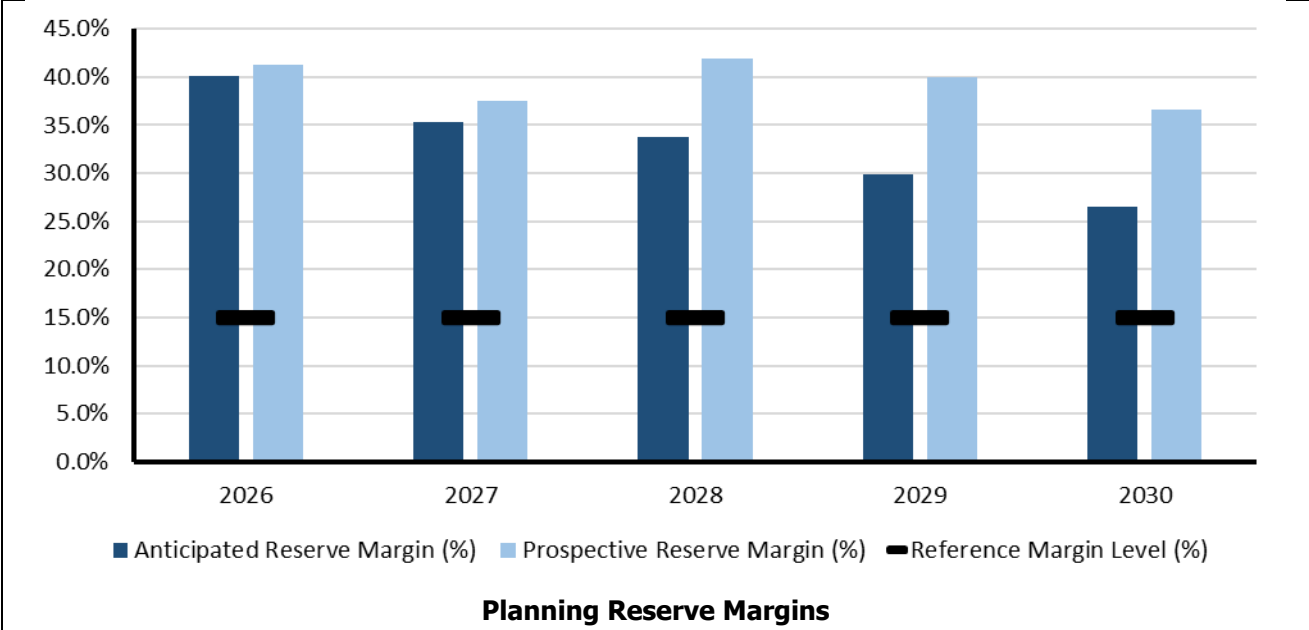


SERC-Southeast

SERC-Southeast is a summer-peaking assessment area within the SERC Regional Entity. SERC-Southeast includes all or portions of Georgia, Alabama, and Mississippi. SERC is one of the six companies across North America that are responsible for the work under FERC-approved delegation agreements with NERC. SERC is specifically responsible for the reliability and security of the electric grid across the southeastern and central areas of the United States. This area covers approximately 630,000 square miles and serves a population of more than 91 million. The SERC Regional Entity includes 36 BAs, 28 Planning Authorities, and 6 Reliability Coordinators.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	48,386	50,648	52,900	55,127	56,624	57,544	57,978	58,552	59,004	59,166
Demand Response	1,358	1,391	1,623	1,634	1,640	1,650	1,656	1,664	1,671	1,677
Net Internal Demand	47,028	49,257	51,277	53,493	54,984	55,894	56,322	56,888	57,333	57,489
Additions: Tier 1	684	2,262	3,704	4,395	4,474	4,474	4,474	4,474	4,474	4,474
Additions: Tier 2	0	516	3,687	4,889	4,989	4,989	4,989	4,989	4,989	4,989
Additions: Tier 3	0	150	250	500	500	500	500	500	500	500
Net Firm Capacity Transfers	814	-53	414	619	619	619	619	619	619	619
Existing-Certain and Net Firm Transfers	65,201	64,393	64,860	65,065	65,065	65,065	65,065	65,065	65,065	65,065
Anticipated Reserve Margin (%)	40.1%	35.3%	33.7%	29.8%	26.5%	24.4%	23.5%	22.2%	21.3%	21.0%
Prospective Reserve Margin (%)	41.3%	37.5%	42.0%	40.0%	36.5%	34.3%	33.3%	32.0%	30.9%	30.6%
Reference Margin Level (%)	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%



SERC-Southeast Highlights

- SERC-Southeast’s ARM does not fall below the RML during the 2025–2035 time frame.
- SERC-Southeast’s ProbA results for the study years 2027 and 2029 indicate a normal level of risk.

SERC-Southeast Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	12,403	12,403	12,403	12,403	12,403
Coal*	12,403	12,403	11,145	11,145	11,145
Petroleum	866	866	866	866	866
Natural Gas	29,765	30,646	31,057	31,057	31,057
Natural Gas*	29,751	30,632	31,043	31,043	31,043
Biomass	428	428	428	428	428
Solar	8,358	8,836	9,667	10,358	10,358
Conventional Hydro	3,292	3,292	3,292	3,292	3,292
Pumped Storage	1,632	1,632	1,632	1,632	1,632
Nuclear	8,018	8,018	8,018	8,018	8,018
Battery	279	557	757	757	836
Total MW	65,042	66,678	68,120	68,811	68,890
Total MW*	65,042	66,678	66,862	67,553	67,632
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to be included in system plans are removed from the resource projection where marked.					

Planning Reserve Margins

PRMs in the Southeast assessment area highlight a proactive and stable approach to ensuring grid reliability, with ARMs projected to remain above reference or target levels throughout the long-term assessment period. Utilities in the region typically plan for a 15% reserve margin, a target that has remained unchanged from prior years. Capacity plans are specifically designed to maintain 15% reserve margins in summer and 25% in winter, consistent with previous long-term assessments. The annual IRP process is crucial, as it addresses resource adequacy well in advance, ensuring that reserve margins consistently stay above these required levels, considering both primary and secondary generation resources.

The methodologies for determining these RMLs are robust and comprehensive. A LOLP analysis is conducted to ascertain if adjustments are necessary to maintain a 1-in-10-year LOLE. This analysis relies on assumptions concerning system loads, potential outages, transfer capabilities, and resource plans, drawing from historical and forecasted data. To account for uncertainties, these assumptions are stress-tested through Monte Carlo simulations across a range of best- and worst-case scenarios, calculating EUE at current RMLs. One utility, which operates independently of state regulatory oversight, conducts its own triennial reserve margin study (RMS) to pinpoint an economically optimal reserve level. This RMS balances capacity costs, production costs, and the costs associated with unserved energy, utilizing a wide array of data including weather variability, unit reliability, fuel availability, and market conditions to model hourly system operations and assess the risk and cost of potential capacity shortfalls. Furthermore, resource adequacy assessments are evolving to include advanced capacity accreditation methods like perfect capacity (PCAP) and ELCC, which more accurately reflect the reliability contributions of VERs. For instance, one ELCC study increased solar peak credit from 50% to 89% for certain solar capacity. No significant changes have been made to reserve margin modeling or resource procurement processes since the previous LTRA, and none are planned for the next decade regarding resource adequacy planning, though input assumptions are regularly updated.

Despite maintaining adequate reserve margins, energy risk assessments highlight an important nuance: reserve margins alone do not guarantee reliability; energy deliverability and fuel sufficiency are also crucial. Results from these assessments may prompt policy updates or recalibrated targets for PRM policies to better align with actual risk levels identified across the year, including non-peak hours. To address identified capacity needs or potential shortfalls, the IRP process leads to procurement actions approved by regulatory commissions. New resource technologies are selected based on their technical, economic, and capacity attributes. For example, one utility intends to maintain its 15% reserve margin by incorporating potential capacity purchases of up to 370 MW to

serve anticipated data mining loads over the next four years, alongside plans to add solar and battery resources in 2029. Overall, planning entities consistently update their capacity expansion plans annually to meet load requirements and adhere to these PRMs.

Non-Peak Hour Risk, Energy Assurance, Probabilistic-Based Assessments

Energy risk assessments in the Southeast assessment area utilize a combination of deterministic and probabilistic methods to identify and address potential energy shortfalls across various planning horizons. These assessments incorporate crucial assumptions about fuel availability, generation outages, extreme weather events, and transmission capabilities. Winter peak hours have been identified as the highest-risk period for energy shortfalls, driven primarily by volatile peak demand during extreme cold weather events that exceeds forecasts, and sustained overnight load where demand remains high throughout the evening and early morning, eliminating traditional off-peak troughs. Recent winter events, like Winter Storm Elliott, have led to updates in load shapes used in modeling, reflecting higher and more sustained loads even outside traditional peak hours.

A significant finding from these assessments is that fuel availability, particularly for natural gas, presents a risk, especially in systems with limited renewable penetration. Entities are mitigating this by securing firm pipeline transportation contracts for baseload plants and ensuring onsite fuel storage (natural gas or fuel oil) for peaking units. Probabilistic modeling, including Monte Carlo simulations, evaluates the impact of these drivers, calculating metrics such as LOLE and EUE; these studies show increased risk in winter and significant EUE increases under fuel-constrained scenarios. Crucially, the results underscore that reserve margins alone do not guarantee reliability; energy deliverability and fuel sufficiency are also vital.

Furthermore, scenarios modeling low hydro output and low solar generation during high-demand periods (especially in winter or prolonged cloudy conditions) indicate increased energy risks when variable energy resources (VERs) underperform. While annual production cost simulations performed in an “island” mode (excluding market purchases) have not identified energy deficiencies under base conditions, the RMS provides a comprehensive probabilistic analysis of hourly energy adequacy by simulating thousands of scenarios and considering historical weather, load, solar availability, fuel constraints, and generator outages. The RMS also assesses regional interdependency risks, finding that transmission constraints can hinder economic and emergency imports, exacerbating local energy shortages during widespread events. Energy risk assessments reflect a maturing focus on year-round, all-hour reliability, emphasizing risks from fuel supply chains, weather variability, and the increasing integration of variable renewable energy sources. These findings may lead to policy updates or recalibrated targets for PRM policies (e.g., 15% summer/25% winter) to better align with actual identified risk levels.

ProbA Results

SERC-Southeast does not show any loss of load risk for the year 2027, the EUE is 0.00 MWh and LOLH is also 0.00 hours. For the year 2029, there is a small ANNUAL risk of 0.39 MWh and 0.001 hours.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	0	0.0	0.4
NEUE (ppm)	0.00	0.00	0.001
LOLH (hours per Year)	0.00	0.00	0.001
* Provides the 2024 ProbA Results for Comparison			

The figure below shows the EUE as a Heat Map for the year 2027.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
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8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

2027 EUE Heat Map

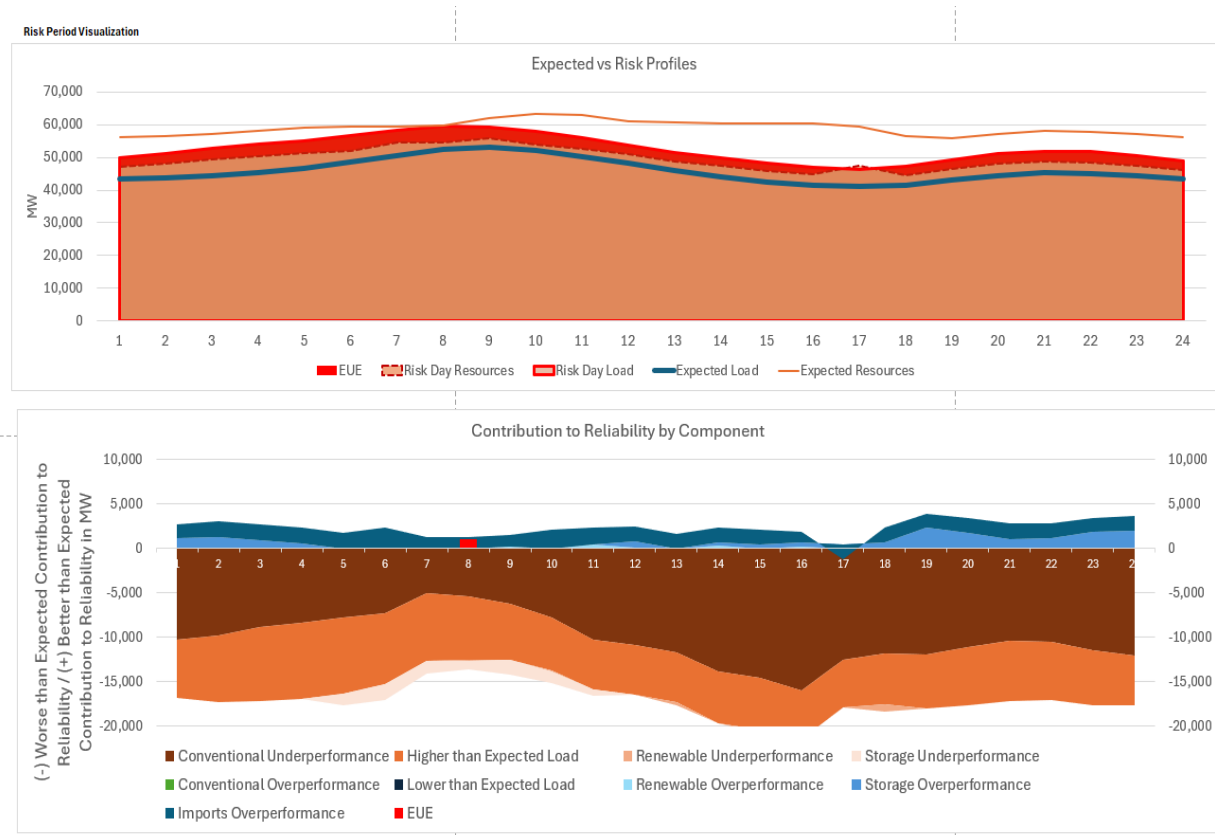
For the year 2029, there is a small annual risk of 0.39 MWh and 0.001 hours. There are some iterations of cases in the 2029 case, for load forecast error +2% and +4%, there is an EUE of up to 1,006 MWh. As shown in the figure below, higher load forecasts, particularly during extreme cold weather events such as weather years 1982, 1985, and 2022, contribute to risk in winter mornings (7:00-8:00 a.m.) and nights (10:00 p.m.-12:00 a.m.). December shows the most risk, followed by January.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	13%	29%	0%
2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	0%	0%	1%	35%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	22%	0%	0%

2029 EUE Heat Map

In the SERC SERVM model, there are 5,375 unique cases. There was not a case for the 1 in 1000 event or higher probability, so the event day with the highest EUE in an hour was selected. Figures below

show the expected (typical) vs. risk profiles and the contribution to reliability by component for the study year 2029.



The top figure compares the event day to a typical day in December, with weather year 1985, which was an extreme cold event. The lower figure shows the loss of load between 7:00-8:00 a.m. when the load is higher than projected, solar generation is unavailable, energy storage and imports are available during the risk hour.

Between 2027 and 2029, SERC-Southeast is expected to add battery and solar generation Tier 1 resources. The addition of solar generation, however, would not help alleviate risk that occurs in winter morning or winter night hours when solar irradiation is unavailable. Georgia Power Company has publicly filed their intent to build company owned combined cycle, battery energy storage systems, hybrid solar and battery energy storage systems, coming online between 2029 and 2031. However, the commission has yet to vote on approval, expected to do so in December and are not included in the model. SERC-Southeast is not expected to retire additional generation during this time.

SERC-Southeast is seeing high load growth. Between summer 2027 and 2029, there is expected to be an addition of 4,468 MW of summer load and 2,134 MW of winter load.

With the growing dependence on natural gas as the predominant energy source in the SERC Southeast subregion, fuel diversity could become an area of future concern.

Demand

The entities in the Southeast assessment area employ a robust approach to developing their load forecast for the LTRA. This methodology combines econometric modeling, statistically adjusted end-use (SAE) analysis, and hourly bottom-up aggregation across members. Forecasts are annually updated based on historical data and the latest S&P Global economic outlook, using regression models that account for weather, economic indicators, population, appliance efficiency, and load shapes. Both coincident and non-coincident peak demand forecasts are included and refined using specialized tools. LFU is addressed by testing load levels ranging from 80% to 104% of projected peak demand, with weather identified as the primary driver of variability. While DERs like rooftop solar currently have minimal impact, their potential effects are considered in sensitivity scenarios. No major changes have been made to the core forecasting methodology since the prior LTRA, though input assumptions are regularly updated.

Several factors contribute to the 10-year forecasted demand and energy growth rates. Data centers are a significant and highly uncertain consideration, capable of substantially increasing demand when included as a sensitivity in reliability studies, with nearly 400 MW of data mining load expected by 2025. These loads often exhibit unpredictable behavior, with some shifting to 24/7 operation, flattening the overnight load curve and extending peak periods, which complicates traditional peak-centric planning. Large commercial and industrial loads are expected to contribute to energy growth in specific economic development areas. Electrification trends are emerging slowly, with limited current impact on forecasts, though home heating electrification is notably contributing to increased winter peak sensitivity. Beyond the 10-year horizon, transportation electrification is anticipated to become a more significant driver of load growth. The influence of climate change and extreme weather on load forecasting is modest in most cases, with some utilities refining models to reflect more frequent cold weather patterns. Recent winter events, like Winter Storm Elliott, have led to updates in load shapes used in modeling, reflecting higher and more sustained loads even outside traditional peak hours. EE improvements are occurring but are not yet deemed a significant overall impact, and flexible or price-sensitive loads are typically modeled on the supply side, thus excluded from direct demand forecasts.

Demand-Side Management

Depending on the entity, DSM could be a voluntary DSM water heater program, which allows for limited control of appliance usage during peak demand periods, with the number of installed control switches tracked monthly to forecast future participation. Load research data is used to estimate the diversified load contribution from these devices. While the entity is monitoring how new EE regulations may impact program effectiveness and developing a DSM measurement and verification (M&V) framework, its analysis currently relies on historical load research data. DR resources under contract are monitored and dispatched, and annual ELCC simulations determine the capacity value of each active DR program. BTM DERs are accounted for within annual load forecasts, while front-of-the-meter (FTM) DERs are treated as generation assets. The entity is also exploring new DR and flexibility programs, including pilot efforts in commercial and industrial automated DR and solar-plus-storage, and implementing a DERMS to enable broader coordination. No modifications to DR methodologies or assumptions have been made since the 2024 LTRA, but new pilot programs and system capabilities are actively being developed. For EE and conservation, no significant changes have occurred in measurement or accounting since the prior LTRA. EE impacts are generally incorporated through adjustments to load forecasts based on federal and state efficiency standards, appliance saturation trends, and building code updates, reflected in econometric models or end-use forecasts that estimate reduced energy consumption over time.

Distributed Energy Resources

The estimated penetration of DERs in the Southeast assessment area remains modest, with forecasts projecting 1–1.5% of peak load over the next five years and staying below 2% over a 10-year horizon. Specifically, BTM solar PV is expected to grow from 57 MW by 2030 to 120 MW by 2035. Currently, DERs and rooftop solar are considered to have minimal impact on overall reliability, with no emerging transmission or resource adequacy issues directly attributed to them anticipated for Summer 2025.

In terms of planning, BTM DERs are accounted for within annual load forecasts and are not explicitly modeled as discrete capacity resources. Instead, they are represented using hourly generation profiles to account for operational factors like ramping, and estimated generation is placed back onto load buses when installations reach or exceed 2 MW. Conversely, FTM DERs are treated as generation assets. While BTM solar is contributing to energy availability and reducing fossil fuel consumption, their limited capacity value and variability are creating challenges, particularly during the sunrise and sunset hours, requiring greater flexibility from non-solar resources. Solar-related ramping concerns and energy adequacy under evolving weather conditions are considered emerging reliability challenges, which are actively being studied through triennial renewable integration studies. Load forecast uncertainty related to DERs is addressed by considering their potential effects in sensitivity scenarios, such as assuming zero DER contribution under stress conditions.

Generation

The Southeast assessment area actively manages its generation portfolio to ensure reliability amid a changing resource mix, with particular focus on the increasing integration of utility-scale solar and other VERs. While current renewable penetration is modest, leading to no significant stability or inertia issues observed to date, future challenges like intra-hour volatility and ramping needs are being proactively evaluated. The Renewable Cost and Benefit (RCB) Framework is utilized to assess integration costs and identify mitigation strategies such as flexible backup resources.

Regarding net demand ramping, the assessment area does not currently identify any emerging issues due to the limited penetration of VERs and a robust, flexible generation portfolio primarily composed of natural gas units. Annual analysis of five-minute ramping data is conducted to inform regulating reserve requirements, and existing natural-gas-fired units, supported by firm fuel supply and fuel-switching capabilities, are deemed sufficient to meet current and projected ramping needs.

Capacity contribution values for VERs like solar and wind are determined using a combination of historical performance data and ELCC analyses via the SERVIM reliability and production cost model. For solar, contributions are initially set at 50% of nameplate capacity during May–September, with annual re-evaluation based on actual performance, though no contribution is assigned in winter due to the assessment area’s winter peak planning season. An ELCC study in 2024 notably increased solar peak credit for up to 340 MW of solar capacity. While energy storage resources are evaluated through ELCC, with a preferred minimum duration of two hours, no operational storage resources are currently on the system. Hydro resources are credited at 100% due to firm delivery contracts.

Efforts to address IBR performance issues include enhanced interconnection studies that assess various factors like thermal loading, voltage stability, and short circuit performance. EMT models are now required from Generator Owners to better simulate and understand IBR behavior during disturbances, and mitigations include adjusting ramp rates and enforcing ride-through requirements. Additional phasor measurement units (PMU) are being deployed to enhance real-time situational awareness, particularly at IBR interconnection points. While current IBR penetration is low, network impacts and protection coordination are identified as the primary reliability concerns being addressed.

Generator retirements have seen no changes to confirmed or unconfirmed projections since the *2024 LTRA*, with no unit retirements currently projected over the 10-year planning horizon. All native generation, including coal, natural gas, and nuclear resources, is expected to remain available to meet peak demands. Planning entities have established processes involving detailed studies over a 10- to 20-year horizon to assess potential reliability impacts of retirements, considering mitigations such as transmission infrastructure capital improvements or dynamic VAR support. The IRP process

coordinates retirement schedules with the addition of replacement capacity to prevent reliability gaps.

Natural gas fuel supply risk is actively managed, with approximately 78% of winter on-peak natural gas generation capacity having either firm fuel supply arrangements or backup fuel options like oil or dual-fuel capability. Annual gas pipeline failure studies are conducted ahead of each summer and winter season to assess impacts under various curtailment scenarios. Communication protocols between electric system operators and natural gas operators are maintained for coordinated responses. Long-term planning processes incorporate fuel risk through load capability analysis and production cost modeling over a 20-year horizon, ensuring capacity plans meet PRMs.

Energy Storage

While there are currently no operational energy storage resources on the system in the Southeast assessment area, future plans do include the addition of solar and battery resources by 2029. BESS are recognized as IBRs that, like solar, require different modeling and analysis techniques compared to traditional synchronous generation. The uncertainty surrounding the future locations and generation outputs of new BESS is noted as a factor that complicates proactive planning.

For planning purposes, energy storage resources are primarily evaluated for their capacity contribution through ELCC analyses. A preferred minimum duration of two hours is considered for operational reliability when evaluating energy storage resources, although there is no formal duration requirement currently enforced. Pilot programs are also being explored, specifically solar-plus-storage initiatives, as new DR and flexibility programs. These programs aim to provide flexible capacity and fast-start capabilities to the system.

No major methodology modifications have been made to the methods or assumptions for incorporating energy storage since the *2024 LTRA*.

Capacity Transfers

Capacity transfers are important for reliability in the Southeast assessment area and the SERC Region. System adequacy is maintained through planning studies and coordination with neighbors to manage evolving energy needs and maintain regional reliability.

Currently, surplus capacity for transfer and delivery is anticipated to remain available to meet reliability margins and support marketing opportunities. Transmission flow patterns are becoming more dynamic due to shifts in internal and external resource portfolios, retirements, additions, and system topology adjustments, but no significant impacts to firm transmission contracts have been

identified to date. Furthermore, recent reserve margin studies suggest that current transmission capabilities do not pose a constraint on resource adequacy within the assessment area.

To facilitate and ensure reliable capacity transfers, the assessment area engages in extensive coordinated efforts, studies, and protocols with neighboring assessment areas for both peak and non-peak hours. These coordinated efforts include:

- **Joint Transmission Planning Studies**, such as the Southeast Regional Transmission Planning (SERTP) process, which evaluate the BPS’s ability to support transfers under various seasonal and system conditions, accounting for projected load growth, generation changes, and transmission upgrades.
- **Firm Transfer Agreements and Modeling**, which are integrated into seasonal and long-range planning studies to ensure deliverability under normal and contingency conditions. These agreements are regularly reviewed and updated.
- **Seasonal Coordination Studies**, including power flow, stability, and transfer capability analyses, conducted prior to each summer and winter season to assess the ability to maintain reliability and meet transfer obligations under expected and extreme conditions.
- **Contingency and Emergency Protocols** with neighboring BA and Reliability Coordinators to support emergency situations and real-time transfers. These protocols are exercised through reliability drills and supported by tools like dynamic line ratings and real-time data sharing.
- **Reserve Sharing and Balancing Arrangements** that enable entities within the assessment area to share generation reserves during system events or peak demand periods, supporting both operational reliability and economic efficiency.
- **Real-Time Operational Coordination** where neighboring areas monitor real-time flows and manage congestion through dynamic scheduling, redispatch strategies, and curtailment procedures as necessary.
- **Coordinated use of the Open Access Same-Time Information System (OASIS)** to ensure transparency and proper scheduling of transfers, preventing violations of reliability standards or operational issues.

Despite these robust coordination mechanisms, energy risk assessments have highlighted certain limitations regarding external reliance, particularly during extreme conditions. Studies, including the RMS, have modeled interactions with 13 neighboring systems to understand the limits of market support during high risk periods. These assessments indicate that regional transmission constraints can hinder economic and emergency imports, potentially exacerbating local energy shortages during widespread events. Furthermore, studies suggest limited excess market generation availability during

extreme weather events in the Southeast, underscoring the critical importance of internal resource adequacy planning.

In terms of future reliance, while the overall trend suggests sufficient internal capacity, one utility expects to potentially make capacity purchases of up to 370 MW to serve possible data mining loads over the next four years. This indicates a willingness to utilize external purchases to meet specific, potentially high-density and unpredictable, new loads. The results of energy risk assessments are used to inform capacity expansion plans and determine the need for additional capacity purchases.

Transmission

Entities within the assessment area have numerous transmission projects planned or underway over the next 10 years to support system reliability and address evolving load and generation needs. These projects include approximately 1,308 miles of new transmission lines above 100 kV, 1,322 miles of line rebuilds, around 20 reactive compensation installations, 50 new transmission stations, and various upgrades to increase the capacity of existing infrastructure. One entity plans to retire a 46 kV transmission path and convert affected delivery points to 115 kV service, constructing a new network line to address localized thermal constraints and improve contingency performance. Power electronic devices such as reactive compensation systems are being installed to enhance voltage stability and system performance. While no major transmission adequacy issues have been identified, there are risks of project delays due to supply chain disruptions and contractor availability. Mitigation measures include staggered project timelines, strategic inventory management, and evaluation of interim technologies like variable line impedance devices. Overall, the assessment area maintains a coordinated and proactive transmission planning approach to ensure continued reliability across the region. Since the 2024 LTRA, planning entities across the assessment area have begun implementing or exploring several enhancements to their transmission planning processes in response to evolving reliability, resource mix, and regulatory conditions. One key area of focus is the growing presence of IBRs, such as solar and battery storage, which require different modeling and analysis techniques compared to traditional synchronous generation. Entities are now incorporating additional scenarios into their long-term planning to assess the adequacy of the transmission system under various levels of IBR penetration, particularly in areas experiencing rapid deployment of utility-scale renewables.

Another significant development involves planning for large data center loads, which present unique challenges due to their high energy consumption and sensitivity to power quality. Entities are preparing to implement new technical studies—such as dynamic modeling and harmonic analysis—to ensure that these loads can be reliably served without compromising grid stability. These studies are expected to become increasingly important over the next 10 years as data centers proliferate across the region. While there have been no wholesale changes to core transmission planning methodologies, adjustments are being made to better reflect recent operating experiences. For

example, entities have refined the load levels used in extreme case scenarios to align more closely with observed peak events. There is also growing interest in performing comprehensive gas-electric interdependency studies to assess the risks posed by natural gas supply disruptions to gas-fired generation resources.

For non-FERC-jurisdictional entities, FERC Order No. 2023 is being monitored, and although compliance is not mandatory, potential alignment with its principles—such as improved generator interconnection procedures and enhanced transparency in queue management—is being considered.

Regional coordination remains a critical component of transmission planning. Entities continue to work closely with first-tier neighbors through long-term, quarterly, and weekly coordination protocols. Interface transfer capabilities are calculated regularly on monthly and two-day-out bases, with requests managed through the OASIS system. Coordination of transfer capability assessments and planning assumptions is also carried out through interregional forums, such as the SERC Long-Term and Near-Term Working Groups and the Southeastern Regional Transmission Planning process. These efforts ensure that planned projects and operational practices are aligned across the region, helping to maintain reliability as system conditions evolve.

Reliability Issues

The Southeast assessment area actively manages its generation portfolio to ensure reliability amidst a changing resource mix. While no significant stability or inertia issues have been observed to date due to the current modest renewable penetration, several evolving reliability concerns are being proactively addressed:

- **Elevated Winter Energy Risk and Sustained Overnight Loads:** Energy risk assessments consistently identify winter peak hours as the highest-risk period for energy shortfalls. This

increased risk is driven by two primary factors: volatile peak demand due to extreme cold weather events exceeding forecasts, and sustained overnight load where demand remains high throughout the evening and early morning. Recent winter events, such as Winter Storm Elliott, have led to updated load shapes that reflect higher and more sustained loads, underscoring the importance of energy adequacy beyond just peak periods. This indicates a shift requiring more continuous energy coverage rather than just peak-hour capacity.

- **Natural Gas Fuel Supply Vulnerability:** Fuel availability, particularly for natural gas, has emerged as a significant energy risk. To mitigate this, entities in the assessment area actively manage natural gas fuel supply risk through firm fuel arrangements, backup capabilities like onsite fuel storage or dual-fuel options (e.g., oil), and annual gas pipeline failure studies conducted before each summer and winter season. Communication protocols are also maintained between electric and natural gas system operators for routine and contingency operations. Long-term planning studies also incorporate considerations for gas production limitations and transportation bottlenecks.
- **Challenges Posed by Large Industrial and Commercial Load Additions:** The assessment area is experiencing an increasing demand of large industrial and commercial load additions, such as data centers and crypto mining facilities, which require enhanced coordination, especially with local distribution cooperatives. These loads can “substantially increase demand” and exhibit unpredictable behavior, with some shifting to 24/7 operation and relying on short-term capacity purchases. Entities are proactively developing updated technical interconnection requirements and pursuing regulatory approvals to procure additional generation to serve these new loads.

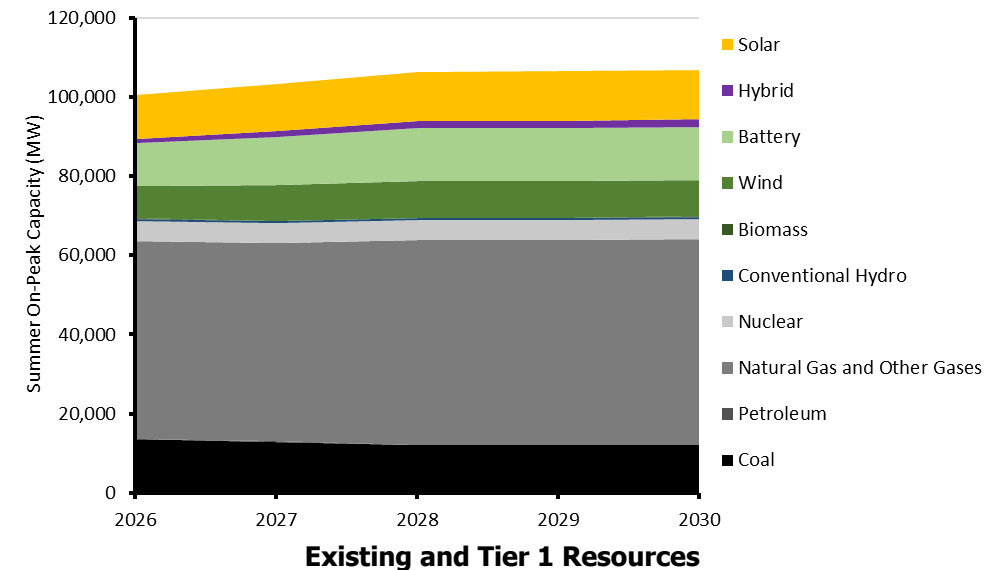
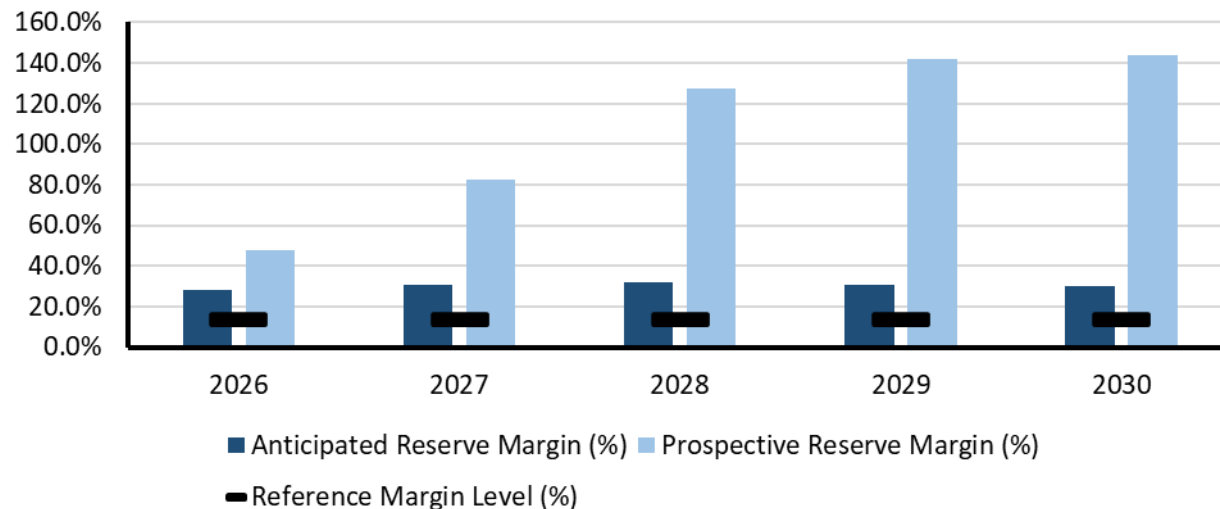


Texas RE-ERCOT

The Electric Reliability Council of Texas (ERCOT) is the ISO for the ERCOT Interconnection and is located entirely in the state of Texas; it operates as a single BA. It also performs financial settlement for the competitive wholesale bulk-power market and administers retail switching for nearly 8 million premises in competitive choice areas. ERCOT is governed by a board of directors and subject to oversight by the PUCT and the Texas Legislature. ERCOT is summer-peaking. It covers approximately 200,000 square miles, connects over 54,100 miles of transmission lines, has over 1,250 generation units, and serves more than 27 million people. Lubbock Power & Light joined the ERCOT grid on June 1, 2021. Texas Reliability Entity is responsible for the Regional Entity functions described in the Energy Policy Act of 2005 for ERCOT.

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	94,650	104,295	121,543	128,851	138,944	144,522	148,567	149,846	152,230	154,077
Demand Response	13,346	22,127	37,672	43,888	53,131	57,720	60,942	61,846	62,644	63,321
Net Internal Demand	81,304	82,168	83,871	84,963	85,813	86,802	87,625	88,000	89,586	90,756
Additions: Tier 1	10,377	15,216	18,527	19,037	19,037	19,037	19,037	19,037	19,037	19,037
Additions: Tier 2	15,391	42,413	79,923	95,374	98,707	99,018	99,018	99,018	99,018	99,018
Additions: Tier 3	5,022	17,546	36,405	51,080	58,217	58,217	58,463	58,463	58,463	58,463
Net Firm Capacity Transfers	508	659	1,122	1,122	1,122	1,122	1,122	1,122	1,122	1,122
Existing-Certain and Net Firm Transfers	93,870	92,008	92,046	92,113	92,401	92,401	92,401	92,401	92,401	92,401
Anticipated Reserve Margin (%)	28.2%	30.5%	31.8%	30.8%	29.9%	28.4%	27.2%	26.6%	24.4%	22.8%
Prospective Reserve Margin (%)	47.9%	82.3%	127.3%	142.1%	143.9%	141.5%	139.2%	138.2%	134.0%	131.0%
Reference Margin Level (%)	13.75%	13.75%	13.75%	13.75%	13.75%	13.75%	13.75%	13.75%	13.75%	13.75%



Texas RE-ERCOT Highlights

- The ARM is above the 13.75% RML for all years and seasons and reflects the inclusion of provisional forecast estimates of large-load curtailment potential, applicable before and during ERCOT emergency conditions.
- ERCOT forecasts total internal demand to increase from 94,650 MW for 2026 to 154,077 MW for 2035, an average annual increase of 5.6%.
- Texas Senate Bill 6, signed into law in June 2025, provides ERCOT with new large-load curtailment management tools and the authority to direct large loads to curtail their load both prior to and during declared energy emergency situations.
 - Offsetting the positive ARM impact of these load management programs is the switch from using historical average on-peak capacity factors to average ELCC for IBRs.
- ERCOT expects battery energy storage capacity to reach 18.9 GW by Summer 2026, growing to 25.2 GW by 2029, which reflects the furthest future year for reported planned commercial operations dates.
- ERCOT's 2024 Regional Transmission Plan (RTP) includes a 345 kV plan and the Texas 765 kV Strategic Transmission Expansion Plan (TX 765-kV STEP), which addresses unprecedented load growth expected by 2030.

Texas RE-ERCOT Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	13,596	12,941	12,156	12,156	12,156
Coal*	13,596	12,550	11,205	11,205	11,205
Petroleum	30	30	30	30	30
Natural Gas	50,032	50,122	51,689	51,689	51,977
Natural Gas*	50,032	49,764	51,331	51,331	51,619
Biomass	131	131	131	131	131
Solar	11,049	11,923	12,305	12,534	12,534
Wind	8,303	8,900	9,215	9,219	9,219
Conventional Hydro	570	570	570	570	570
Nuclear	4,973	4,973	4,973	4,973	4,973
Hybrid	1,127	1,497	1,813	1,909	1,909
Battery	10,734	12,285	13,375	13,374	13,374
Total MW	100,545	103,372	106,257	106,584	106,872
Total MW*	100,545	102,203	104,528	104,855	105,143
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to be included in system plans are removed from the resource projection where marked.					
**Wind, solar, and battery capacities are based on their projected effective load carrying capabilities during peak load conditions.					

Texas RE-ERCOT Assessment

Planning Reserve Margins

The ARM is above the 13.75% RML only for summers 2026 and 2027, and winters 2025–26 and 2026–27. The main contributing factor for lower ARMs relative to last year’s LTRA is the switch from using historical average on-peak capacity factors to average ELCC for IBRs. In the case of solar, ELCCs are significantly lower than on-peak capacity factors since ELCCs reflect resource reliability value, and in the case of solar, this value has been decreasing as reserve scarcity risk shifts to the evening hours when solar availability is low. Partially offsetting the reduction in solar contribution was the shift from assigning 0% on-peak capacity contribution for battery energy storage to using average ELCCs based on design duration. For example, battery storage systems with a duration of one hour or less are assigned an ELCC of 36%, whereas the ELCC for systems greater than one hour and less than two hours is 69%.

Energy Risk, Including Non-Peak Hour Risk

For non-winter months, ERCOT continues to experience the highest reserve scarcity risk during the early evening hours—peaking at HE 9:00 p.m.—based on probabilistic capacity reserve modeling for monthly peak load days. The elevated risk is due to the drop-off in solar generation and continued higher loads during those hours. However, the large growth in battery energy storage resources and associated changes in state of charge management have mitigated the capacity reserve scarcity risk relative to previous years. For winter, risk modeling indicates elevated reserve scarcity risk for the morning hours (HE 7:00 to 9:00 a.m.) as well as the early evening hours.

Probabilistic Assessments (NERC ProbA and Other Studies)

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	11,090	5,864	17,053
NEUE (ppm)	18.95	8.70	18.84
LOLH (hours per Year)	1.57	0.94	3.64
* Provides the 2024 ProbA Results for Comparison			

Like the 2024 ProbA Study, most risk is in the winter, and this is mainly driven by the large demand variability modeled in the winter. By 2029, there is significant risk in the summer and slight risk in the shoulder seasons, driven by the considerable growth of large loads across the year.

12x24 EUE Heat maps (months for the vertical axis, hours for the horizontal axis) for 2027 and 2029 are provided below. Note that as the numbers are given in percentages, the lower winter values in 2029 relative to 2027 do not indicate a decrease in winter risk, just a smaller portion of the annual total.

2027

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	4%	3%	2%	2%	3%	5%	8%	11%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	4%	7%	5%	4%	4%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
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8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	2%	2%	2%	2%	2%	3%	4%	7%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	3%	4%	4%	4%

2029

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	3%	2%	2%	2%	3%	4%	6%	7%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2%	3%	4%	4%	4%	3%	3%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	0%	0%	0%	0%
7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2%	4%	1%	0%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%	5%	1%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	1%	1%	1%	1%	1%	2%	2%	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	3%	2%	2%	2%	2%

Demand

ERCOT forecasts summer peak total internal demand to increase from 94,650 MW for 2026 to 154,077 MW for 2035, an average annual increase of 5.6%. This load growth is mainly driven by forecasted interconnections of large loads, comprised mostly of data centers. The breakdown of new large loads added by 2030 by customer classification is as follows:

Load Additions in the Load Forecast (MW) (Cumulative)			
Load Type	End of Year 2 (2027)	End of Year 5 (2030)	End of Year 10 (2035)
Data Centers	6,700	23,000	25,000
Cryptocurrency Mining Facilities	4,500	7,500	8,500
Hydrogen Electrolysis	3,000	7,902	9,100
Industrial Manufacturing Load	2,800	7,100	7,600

For 2025, the ERCOT transmission service providers (TSP) had once again reported a significantly larger-than-normal amount of contracted large loads that they asked to be included in the *2025 Long-Term Load Forecast* and *Regional Transmission Planning Study*. Due to the large amount of large-load requests for 2025, ERCOT has applied adjustment factors to these requests. ERCOT has adjusted the large-load projections provided by the TSPs based on the patterns observed by recent projects. The first adjustment was based on the average project delay of 180 days from the original project requested energization date for projects with in-service dates in 2022 through 2024. The next adjustment was applied to Data Centers. ERCOT studied requested MWs versus the peak consumption by data center site for data centers with in-service dates in 2022 through 2024. The average peak consumption per site was 49.8% of the requested MW. This factor was applied to all non-crypto data center load additions. The final adjustment used the percentage of previously filed officer letter projects with in-service dates in 2024 that have energized (55.4%). This percentage is based on percentage of loads energized.

The PUCT is developing criteria for including large loads in ERCOT’s load forecasts along the lines of criteria applicable to generation projects (for example, the large-load customer has executed and securitized an interconnection agreement or meets other criteria demonstrating a firm commitment to interconnecting the load).

Demand-Side Management

Signed into law in June 2025, Texas Senate Bill 6 directs the PUCT to establish uniform large-load interconnection standards that, among other things, provide ERCOT with new large-load curtailment management tools and ERCOT’s authority to direct (or require transmission service providers to direct) large loads to curtail their load prior to and during declared energy emergency situations. The following table shows the total large loads and their curtailment amounts included in the “Controllable and Dispatchable Demand Response” line items.

Summer	Total LL (MW)	LL Curtailment (MW)		Winter	Total LL (MW)	LL Curtailment (MW)
2025 (S)	3864.4	1,313.9		2025-26 (W)	9112.9	8,227.7
2026 (S)	12355.4	8,853.5		2026-27 (W)	17289.8	15,909.3
2027 (S)	21665.7	17,171.5		2027-28 (W)	31590.8	29,408.9
2028 (S)	38583.3	32,716.5		2028-29 (W)	45249.3	42,298.1
2029 (S)	45681.1	38,932.6		2029-30 (W)	55533.1	51,981.4
2030 (S)	55964.9	48,175.5		2030-31 (W)	60917.9	57,010.6
2031 (S)	61349.7	52,764.3		2031-32 (W)	64863.6	60,672.7
2032 (S)	65295.4	55,985.9		2032-33 (W)	66370.5	62,017.8
2033 (S)	66802.3	56,890.6		2033-34 (W)	67764.7	63,256.0
2034 (S)	68196.5	57,688.4		2034-35 (W)	69032.1	64,373.6
2035 (S)	69463.9	58,365.6		2035-36 (W)	69805.1	65,043.3

Distributed Energy Resources

DERs that register with ERCOT to participate in wholesale energy and/or ancillary services markets are modeled and dispatched in ERCOT transmission planning studies similarly to transmission-connected resources participating in those markets. For DERs not participating in those markets, ERCOT relies on member Transmission and Distribution Service Providers (TDSPs) to provide information about individual DERs on their systems for shorter-term reliability and economic impact studies, typically a one-to-six-year time frame.

ERCOT has proposed rule changes mandated by the Texas Legislature to establish a process to collect comprehensive data from Distribution Service Providers for so called “Unregistered Distributed Generators” (primarily rooftop solar systems). The data will be collected on a substation level and will include information to be used for network modeling and analysis, including aggregate reactive power capability and status of PUCT voltage/frequency ride-through requirements.

Generation

In 2024, ERCOT received notices of suspension of operations for three gas-steam units in the San Antonio area. Reliability impact studies indicated that all three were needed to manage the South Texas Interconnection Reliability Operating Limit (IROL) established in 2024. As a result, ERCOT signed

a two-year “Reliability Must Run” (RMR) agreement with CPS energy for one of the three generators (Unit 3). This generator, as part of its RMR service obligation, would only operate when necessary to provide voltage support, stability, or management of localized transmission constraints when a market solution does not exist. ERCOT also signed a contract in June 2025 to use 15 mobile generators that are being relocated from Houston to the San Antonio area. The contract ends in March 2027 when transmission solutions are expected to be in place to offset the loss of the mothballed CPS generating units.

New rules became effective in October 2024 to improve IBR ride-through performance and monitoring and mitigation efforts. The rules were developed in response to NERC recommendations following IBR failures during system disturbances in West Texas. The new ride-through requirements align with the specifications of the updated IEEE 2800-2022 standard, which addresses the interconnection and interoperability of IBRs. As part of the new rules, IBR entities are required to maximize their IBR ride-through capabilities, which includes making software, firmware, and settings adjustments, and potentially physical modifications to ensure that they can remain connected to the grid during frequency and voltage disturbances. The rules also establish a process for investigating, reporting, and mitigating ride-through performance failures, requiring resource entities to develop mitigation plans within a defined timeline. IBR entities must meet the new requirements by December 31, 2025, or their synchronization date, subject to an extension/exemption process.

During 2024, units totaling 18.6 MW were retired, comprising a 9.6 MW biomass facility, a 7 MW wind site, and 2 MW battery storage system. So far in 2025, a 62 MW gas combined-cycle unit was retired.

Energy Storage

ERCOT expects battery energy storage capacity to reach 18.9 GW by summer 2026 (Existing and Tier 1 resource categories). The capacity grows to 25.2 GW by 2029, which reflects the furthest future year for planned commercial operations dates reported by project developers.

ERCOT is moving away from a dual to an integrated single model of an energy storage resource for operational and transmission planning studies. Under the dual approach, an energy storage resource is composed of a generator with a negative minimum power to represent consumption and a generator with a positive maximum power to represent injection. The single “integrated” generator model, along with other system enhancements for battery energy storage, is being implemented as part of ERCOT’s “Real Time Co-Optimization + Battery” project, expected to be implemented by December 2025. Since each resource receives independent dispatch instructions and ancillary service deployments in the dual model approach, moving to a single integrated resource model will eliminate current performance monitoring issues. The discharging behavior for all energy storage resources is considered for peak cases in transmission planning studies. The charging behavior for all energy

storage resources is considered for minimum load cases in transmission planning studies. Energy storage resources, if required to provide voltage support, need to have the reactive power capability be available at all MW levels when charging or discharging and meet the voltage ride-through requirements to remain connected to the system. To support larger penetration levels of energy storage resources, new rules have been implemented to improve state-of-charge monitoring in energy dispatch and Reliability Unit Commitment.

Capacity Transfers (Reliance on Assistance)

ERCOT has coordination plans in place with neighboring grids. These plans cover DC tie emergency operations, procedures for generators that can switch between grids, and temporary block load transfers. For its transmission planning studies, ERCOT tests the outage of each of the ERCOT-SPP DC ties, plus a contingency on top of that, to ensure no reliability issues post-contingency. There are no severe scenarios studied where multiple DC ties are assumed to be unavailable.

Transmission

ERCOT’s 2024 RTP includes a 345 kV plan and a 765 kV plan, called the Texas 765-kV Strategic Transmission Expansion Plan (TX 765-kV STEP). The 765-kV plan tackles the unprecedented load growth expected by 2030 and associated regional planning challenges and addresses existing congestion issues. TX 765-kV STEP enhances transfer capability by an additional 600 to 3,000 MW across various scenarios evaluated in the analysis and would also increase the West Texas export stability constraints. The 765 kV addition enables power to flow more efficiently through long-distance transmission from resource-rich regions to load centers. Overall, 274 reliability projects were identified in the 2024 RTP’s 345 kV plan to address all reliability violations compared with 173 projects in the 2023 RTP, 89 projects in the 2022 RTP, 67 projects in the 2021 RTP, and 50 projects in the 2020 RTP. This upward trend reflects grid infrastructure needed to support rapidly growing power demands and an evolving generation resource mix.

ERCOT is adopting changes to its planning processes to address the long-term transmission challenges. Examples of the major changes include establishment of a new congestion cost savings test for economic project evaluation, establishment of resiliency criteria for the ERCOT region, and development of new multi-value criteria to address the process for determining whether a project that addresses a resiliency issue provides sufficient benefit balanced with economic savings or reliability benefits.

Reliability Issues

There are several reliability concerns associated with the rapid growth in large loads:

Loss of Load: Due to the amount of large electronic-based load projected to energize in upcoming years (mainly from cryptocurrency mining facilities), ERCOT is concerned that potentially thousands of megawatts of load can instantly drop or switch to backup generation during normally cleared system faults, thereby posing significant risks to system reliability. To address this concern, ERCOT has proposed a change to its Reliability Performance Criteria to limit load loss for any single contingency and to specify how loss of load is calculated for this criterion. ERCOT recently completed a Load Loss Threshold Analysis that indicates that the load loss should be limited to 2,600 MW.

Load Forecasting Challenges: The flexible operation of large loads also presents challenges for accurate load forecasting and monitoring. ERCOT has observed increasing errors in its load forecasts, which is problematic during extreme or unusual operating days when having an accurate forecast is most critical for maintaining reliability. New approved rules include standards for the identification and classification of a site with an aggregate peak demand of 25 MW or more at a common substation in ERCOT’s Network Operations Model. Such information will provide ERCOT visibility of the locations of these loads for operational, modeling, and planning purposes.

Potential Subsynchronous Oscillation Vulnerabilities: Large loads, particularly those with high reactive power consumption, can cause subsynchronous oscillation (SSO) that can damage generation and other equipment and ultimately destabilize the grid. This vulnerability is highest in areas with a weak grid, such as West Texas. To address SSO issues, ERCOT is implementing new rules that require SSO vulnerability assessments for large-load customers seeking grid interconnection as well as for transmission projects.

Need for a Large Load Interconnection Study Process: ERCOT identified the need for a Large Load Interconnection Study (LLIS) process several years ago due to the emerging reliability impacts. An interim process was estimated in March 2022. A final interconnection process was approved by the PUCT in May 2025.

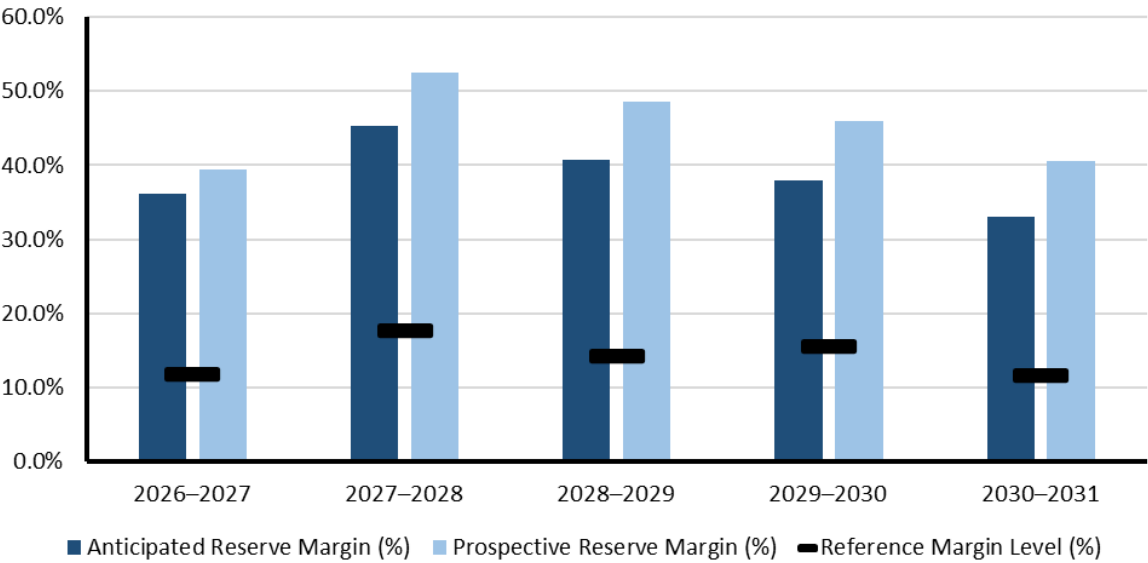


WECC-Alberta

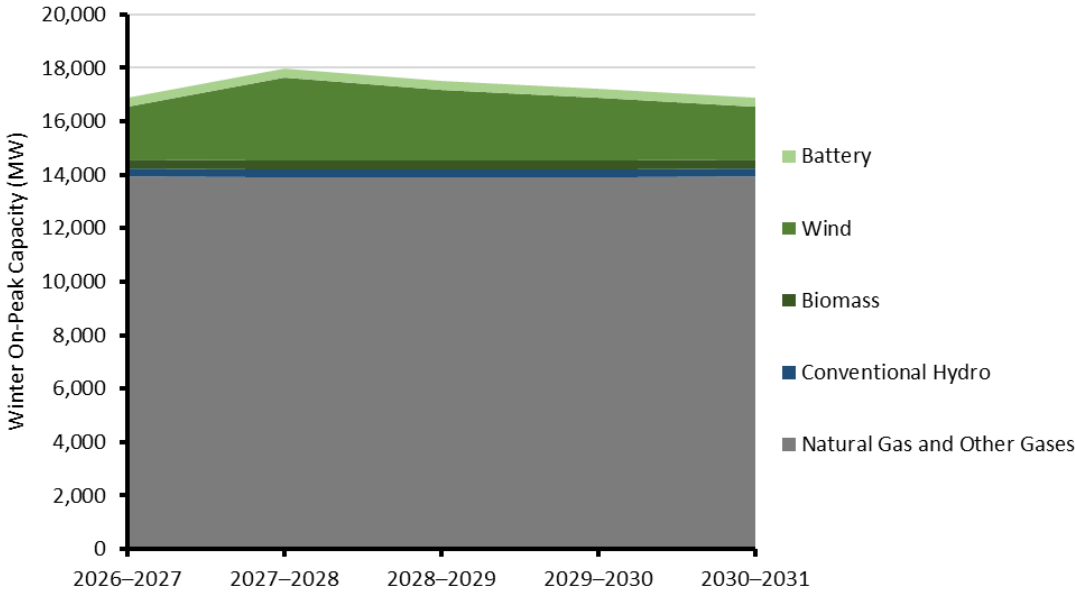
WECC-Alberta is an assessment area that covers the Canadian province of Alberta. The province has a geographic area of 661,848 square kilometers (255,541 square miles) and a population of almost 5 million people. The Alberta Electric System Operator (AESO) is the province’s Planning Entity and Reliability Coordinator responsible for safe, reliable, and economic operation of the Alberta Interconnected Electric System. AESO is a non-profit corporation that operates a system that includes approximately 26,000 kilometers of transmission lines and connects approximately 426 qualified generating units and nearly 250 market participants through a wholesale market. Alberta’s transmission system has three interties with neighboring areas—Saskatchewan (see MRO-SaskPower), British Columbia (see WECC-British Columbia), and Montana (see WECC-Northwest). Peak electricity demand on the AESO system currently occurs during the winter season.

Demand, Resources, and Reserve Margins

Quantity	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2031–2032	2032–2033	2033–2034	2034–2035	2035–2036
Total Internal Demand	12,463	12,434	12,510	12,528	12,759	12,831	12,956	12,992	13,076	13,470
Demand Response	0	0	0	0	0	0	0	0	0	0
Net Internal Demand	12,463	12,434	12,510	12,528	12,759	12,831	12,956	12,992	13,076	13,470
Additions: Tier 1	209	209	209	209	209	209	209	209	209	209
Additions: Tier 2	393	889	983	1,009	959	1,009	921	971	971	971
Additions: Tier 3	392	658	917	1,297	1,334	1,631	1,635	1,751	1,751	1,751
Net Capacity Transfers (WECC Model)	0	0	0	0	0	0	0	0	0	0
Existing-Certain and Net Transfers	16,764	17,856	17,394	17,074	16,764	17,074	16,502	16,820	16,820	16,820
Anticipated Reserve Margin (%)	36.2%	45.3%	40.7%	38.0%	33.0%	34.7%	29.0%	31.1%	30.2%	26.4%
Prospective Reserve Margin (%)	39.3%	52.4%	48.6%	46.0%	40.5%	42.6%	36.1%	38.5%	37.7%	33.6%
Reference Margin Level (%)	11.8%	17.6%	14.3%	15.6%	11.6%	15.2%	12.2%	14.3%	13.9%	13.5%



Planning Reserve Margins



Existing and Tier 1 Resources

WECC-Alberta Highlights

- WECC-Alberta’s ARM does not fall below the RML during the 2025–2035 time frame.
- WECC-Alberta’s total electricity demand is projected to grow by 10% over the next 10 years. Summer peak hour demand is projected to grow by 7%, and winter peak hour demand is projected to grow by 11% over the same period.
- Alberta is anticipated to add 556 MW of Tier 1 gas, solar, and battery resources over the next 10 years. Alberta’s thermal power generation fleet is aging, and significant additions of Tier 2 and 3 variable renewable energy resources are being proposed to make up for forthcoming thermal retirements while meeting Alberta’s 30% renewable by 2030 policy requirement. On top of the 250 MW of existing storage, 88 MW are anticipated Tier 1 and 370 MW are Tier 2 additions over the next 10 years. Still, rapid declines in solar and wind output could cause ramping issues in the future and require the use of contingent reserves and assistance from the NWPP Reserve Sharing Group.
- AESO has recently added two transmission lines to its system to increase reliability and integrate fossil-fired generation additions.
- Under a different set of assumptions and with a different vintage of data from the LTRA, the NERC ITCS for Canada concluded that WECC-Alberta may have winter energy deficiencies that could be alleviated by increased transfer capabilities.

WECC-AB Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031
Natural Gas	13,932	13,908	13,890	13,900	13,932
Biomass	336	336	335	336	336
Wind	2,000	3,109	2,665	2,327	2,000
Conventional Hydro	293	301	301	310	293
Other	81	81	81	81	81
Battery	330	330	329	330	330
Total MW	16,973	18,065	17,602	17,283	16,973

WECC-Alberta Assessment

Planning Reserve Margins

WECC-Alberta’s ARM does not fall below the RML during the 2025-2035 time frame. WECC continues to use a probabilistic approach for determining RMLs, holding a LOLP less than or equal to 0.02% (approximately a 1 day in 10 years loss of load). The model determines what reserve margin must be held to maintain a fixed LOLP. Using this technique, a target reserve margin is evaluated for every hour of every year of the full forecast period.

There have, however, been changes to policies that might affect planning and procurement over the next 10 years. The Canada Clean Electricity Regulations (CER) were finalized in December 2024, which delayed the nationwide net-zero electricity target from 2035 to 2050. Alberta has recently entered into an agreement with the Canadian federal government to pursue alternative policies to achieve a net-zero power grid by 2050.

Energy Risk, Including Non-Peak Hour Risk

AESO uses an hourly probabilistic model to quantify uncertainties around unit availability, dispatch economics, load variability, and weather impact on load and generation in operational time frames.

ProbA Results

Alberta does not show any LOLH or EUE in 2027 or 2029 and therefore does not have any further reporting or visualizations.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	0	0	0
NEUE (ppm)	0.00	0.00	0.00
LOLH (hours per Year)	0.00	0.00	0.00
* Provides the 2024 ProbA Results for Comparison			

Demand

Alberta’s annual demand is projected to grow 10% over the next 10 years. Summer peak hour demand is projected to grow 7% and winter peak hour demand is projected to grow 11% over the same period. The primary driver for demand growth in Alberta is transportation electrification. Large-load additions in the forecast total 80 MW over the next five years and 105 MW through 2035. Additional large loads that may materialize and are not included in the forecast amount to 1,600 MW by 2030 and 2,100 by 2035.

Seasonally, the region is becoming more dual-peaking with summers almost matching winters.

Demand-Side Management

AESO factors in approximately 250 MW of DSM in its load forecast and this is projected to remain steady across the 10-year assessment period.

Generation

Alberta is anticipated to add 556 MW (nameplate capacity) of Tier 1 gas, solar, and battery resources over the next 10 years. Tier 2 additions include nearly 5 GW of gas, solar, wind and batteries and Tier 3 additions include just over 5 GW of gas, solar, wind, conventional hydro, and batteries. Operational and planning issues related to generation in WECC-Alberta include the following:

- Aging Thermal Resource Fleet: There is ongoing analysis of potentially mothballing aging coal-to-gas boilers. Alberta has five natural gas steam sites over 35 years old, which total 1,745 MW of capacity. Alberta shows significant additions of Tier 2 and Tier 3 solar and wind to make up the difference. Supply shortfalls are addressed using the protocols in AESO’s ISO Rules. These protocols include directives such as instructing available assets and long-lead-time assets to deliver energy up to their maximum capability, calling upon DR, and maximizing import capability.
- Solar and Wind Variability: Rapid decline in solar and wind output coupled with off-line thermal resources can create situations in which thermal resources cannot be ramped up in time to counter the loss of renewable generation. The use of contingency reserves coupled with a subsequent grid alert declaration to receive assistance from the NWPP Reserve Sharing Group (NWPPRSG) are options for addressing these situations.
- Electric-Gas Coordination: As a part of WECC’s load and resources data request, members were asked to provide a conservative estimate of the percentage of natural gas generating capacity that is likely to have firm supply for 2025 and 2030 for both the summer and winter season. Results indicated that all natural-gas-fired generators connected to AESO’s system are fueled through firm gas supply contracts during both the summer and winter seasons but do not report any dual-fuel capacity. To enhance operational reliability of natural gas fuel supplies for the province, Alberta’s natural gas operators are part of the Northwest Mutual Assistance Agreement. This is a voluntary collaboration amongst entities controlling natural gas resources in British Columbia, Alberta, Washington, Oregon, Nevada, and Idaho to cooperate and provide aid to one another when unplanned events impact the gas supply and transportation system. There is frequent communication between system operators regarding gas resources

that are planned for operation and pipeline representatives regarding the status of pipelines serving the jurisdictions covered by the agreement.

- Resource Portfolio, Clean Electricity, and Development Policies: The Canadian province of Alberta is required to ensure its electricity supply is [30% renewable by 2030](#). Alberta has also issued a ban on renewable energy project development on prime agricultural land and a buffer zone around pristine views, both of which could limit siting for wind and solar. This followed a temporary moratorium from August 2023 to March 2024 on new renewable approvals, creating investment uncertainty. In January 2025, Alberta lifted a previous 2022 moratorium on coal exploration, reopening 190,000 hectares of land to new coal development.

Energy Storage

In addition to the 250 MW of existing energy storage in Alberta, 88 MW are anticipated Tier 1 additions, and 370 MW are projected Tier 2 additions of energy storage over the next 10 years. Storage in the west is generally being relied on to help mitigate ramping risk from afternoon net demand due to increasing penetrations of solar.

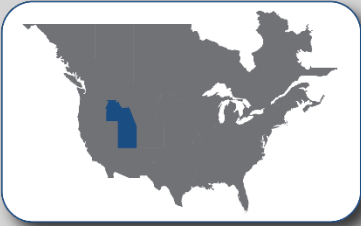
Energy Transfers

According to the NERC’s [ITCS Canadian Analysis](#), the total simultaneous transfer capability into the Alberta transmission planning region from all its neighbors, including dc-only interties, is 1,096 MW in 2024 Summer and 1,005 MW in 2024–25 Winter. These values translate to approximately 10% of peak summer load and 9% of peak winter load in the analysis years. The two interfaces include connections with the U.S. state of Montana (see WECC-Northwest) and British Columbia (see WECC-British Columbia).

The ITCS for Canada further showed that WECC-Alberta may have winter energy deficiencies that can be alleviated with increased transfer capabilities.

Transmission

In 2024, Alberta added two transmission lines for fossil-fired integration. The reported primary driver for transmission expansion in Alberta is reliability.

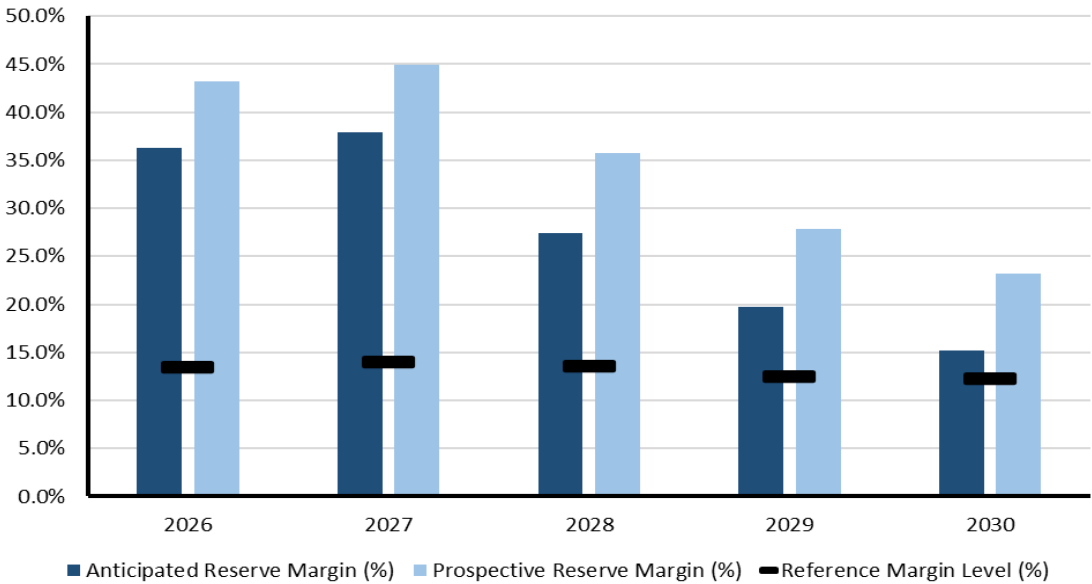


WECC-Basin

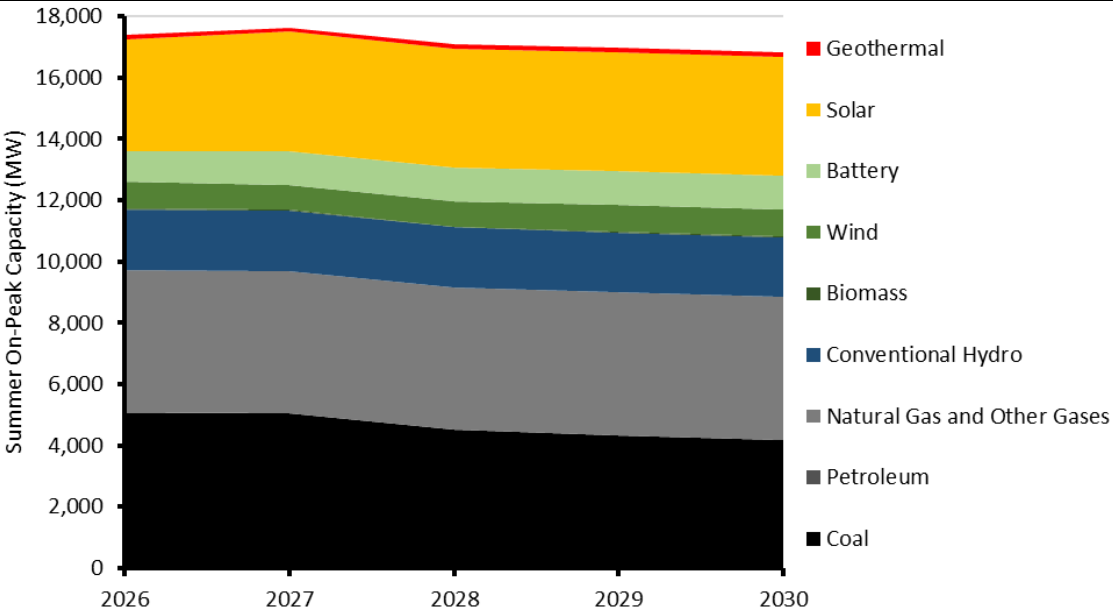
WECC-Basin is a summer-peaking assessment area in the WECC Regional Entity that includes Utah, southern Idaho, and a portion of western Wyoming, covering Idaho Power and PacifiCorp’s eastern BA area. The population of this area is approximately 5.4 million. It has 15,910 miles of transmission. WECC is responsible for coordinating and promoting BES reliability in the Western Interconnection. WECC’s 329 members include 40 BAs, representing a wide spectrum of organizations with an interest in the BES. Serving an area of nearly 1.8 million square miles and more than 84.5 million customers, it is geographically the largest and most diverse Regional Entity. *Note: The 2025 LTRA includes a new assessment area map for the U.S. Western Interconnection. The new assessment area boundaries provide more geographic detail of reliability risk information. WECC-Basin is a new assessment area in 2025 that was part of WECC-NW in the 2024 LTRA.*

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	14,794	15,326	16,012	16,396	16,762	17,099	17,202	17,268	17,344	17,467
Demand Response	670	670	670	670	670	670	670	670	670	670
Net Internal Demand	14,124	14,656	15,342	15,726	16,092	16,429	16,532	16,598	16,674	16,797
Additions: Tier 1	2,125	2,453	2,453	2,466	2,466	2,466	2,466	2,453	2,466	2,466
Additions: Tier 2	973	1,018	1,270	1,279	1,279	1,279	1,279	1,270	1,279	1,279
Additions: Tier 3	127	1,162	2,024	2,616	4,209	4,726	5,665	6,203	6,332	6,332
Net Capacity Transfers (WECC Model)	1,822	2,545	2,420	1,820	1,698	1,400	1,400	1,400	1,400	1,400
Existing-Certain and Net Transfers	17,125	17,763	17,097	16,357	16,071	15,736	15,729	15,315	15,288	15,280
Anticipated Reserve Margin (%)	36.3%	37.9%	27.4%	19.7%	15.2%	10.8%	10.1%	7.1%	6.5%	5.7%
Prospective Reserve Margin (%)	43.2%	44.9%	35.7%	27.8%	23.1%	18.6%	17.8%	14.7%	14.2%	13.3%
Reference Margin Level (%)	13.5%	14.0%	13.6%	12.4%	12.3%	12.1%	12.1%	12.5%	11.8%	11.8%



Planning Reserve Margins



Existing and Tier 1 Resources

WECC-Basin Highlights

- The ARM does not fall below the RML during the 2025–2035 time frame. IPCO and PACE participate in the Western Resource Adequacy Program (WRAP).
- The Basin subregion shows three LOLH in 2027 totaling approximately 3 MWh of EUE in June and July at hours beginning 18:00 and 19:00. In 2029, the subregion shows 310 LOLH totaling approximately 200,892 MWh of unserved energy. Over 90% of the EUE occurs between the hours of 17:00–22:00 from June to September.
- For 2027 and 2029, the peak hour is projected to occur in July at hour beginning 15:00.
- The LOLH in 2027 and 2029 coincides with the evening solar down ramp and the persistence of elevated demand after peak.

WECC-Basin Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	5,068	5,041	4,508	4,326	4,177
Petroleum	5	5	5	5	5
Natural Gas	4,655	4,634	4,634	4,655	4,655
Biomass	31	31	31	31	31
Solar	3,668	3,899	3,899	3,884	3,884
Wind	900	826	826	897	882
Geothermal	139	139	139	139	139
Conventional Hydro	1,962	1,976	1,968	1,954	1,954
Other	31	31	31	19	19
Battery	967	1,090	1,090	1,092	1,092
Total MW	17,428	17,672	17,130	17,003	16,839

WECC-Basin Assessment

Planning Reserve Margins

The ARM does not fall below the RML during the 2026–2035 time frame. The Idaho Power and PacificCorp East balancing areas both participate in WRAP, the first regional reliability planning and compliance program in the West.

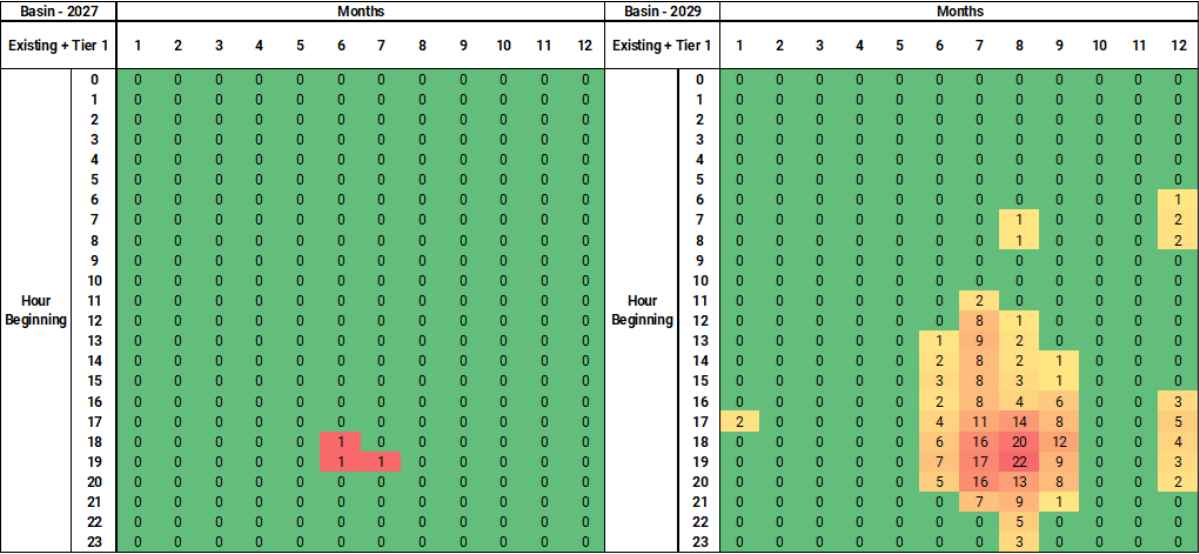
Energy Assessment, Including Non-Peak Hour Risk

WECC performs a probabilistic resource adequacy analysis using the Multiple Area Variable Resource Integration Convolution model (MAVRIC). MAVRIC is WECC’s internally developed modeling tool that performs energy based ProbAs that support NERC’s LTRA and seasonal assessments, as well as WECC’s Western Assessment of Resource Adequacy (WARA).

Although the WECC-Basin assessment area’s ARM does not fall below the RML during the 2026–2035 time frame and indicates substantial surplus, the ProbA results indicate significant EUE and LOLH. As resource additions struggle to keep up with rising demand and expected generator retirements, reflected in falling ARMs after 2027, unserved energy and load-loss increase in the ProbA results. The LOLH in 2027 and 2029 coincides with the evening solar down ramp and the persistence of elevated demand after peak.

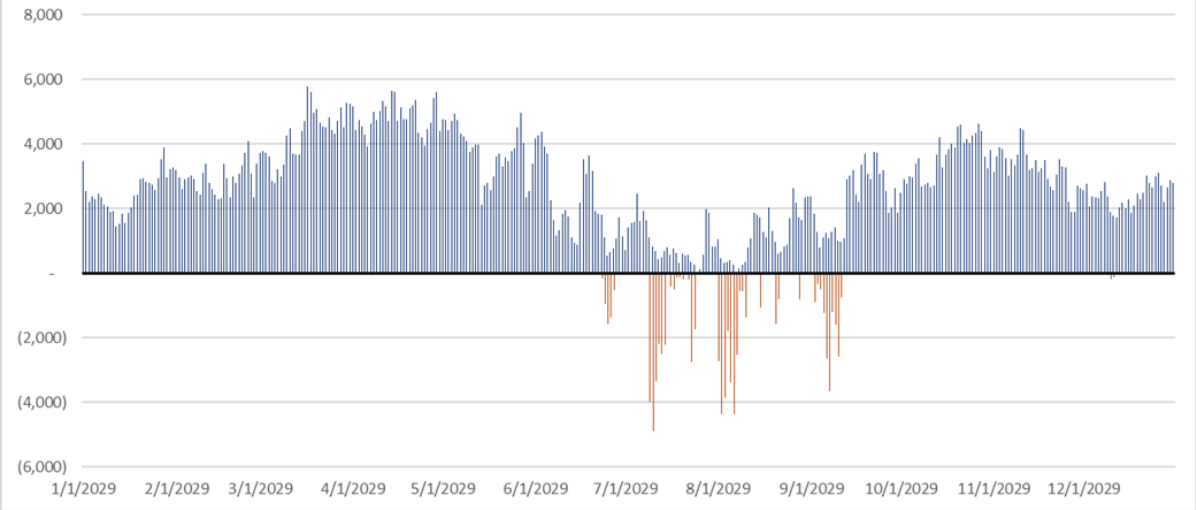
Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	N/A	3	200,892
NEUE (ppm)	N/A	0.04	2250.70
LOLH (hours per Year)	N/A	3.00	310.00
* No prior results as the assessment area is new for the 2025 LTRA.			

The risk of shortfall in the WECC-Basin area is concentrated in the summer months when seasonal electricity demand is highest. In the ProbA results illustrated in the following heat map figure, risk is most concentrated to the month of peak demand (June) and the hours around sunset as solar output declines. The values in the heat map are the number of hours from the MAVRIC simulations that resources fall short of demand and reliability margins in the study year. For 2029, as planned retirements of coal-fired generation and all currently projected resource additions are reflected in the resource mix, risk periods expand across all summer months, and the hours of risk extend from midday to nighttime.



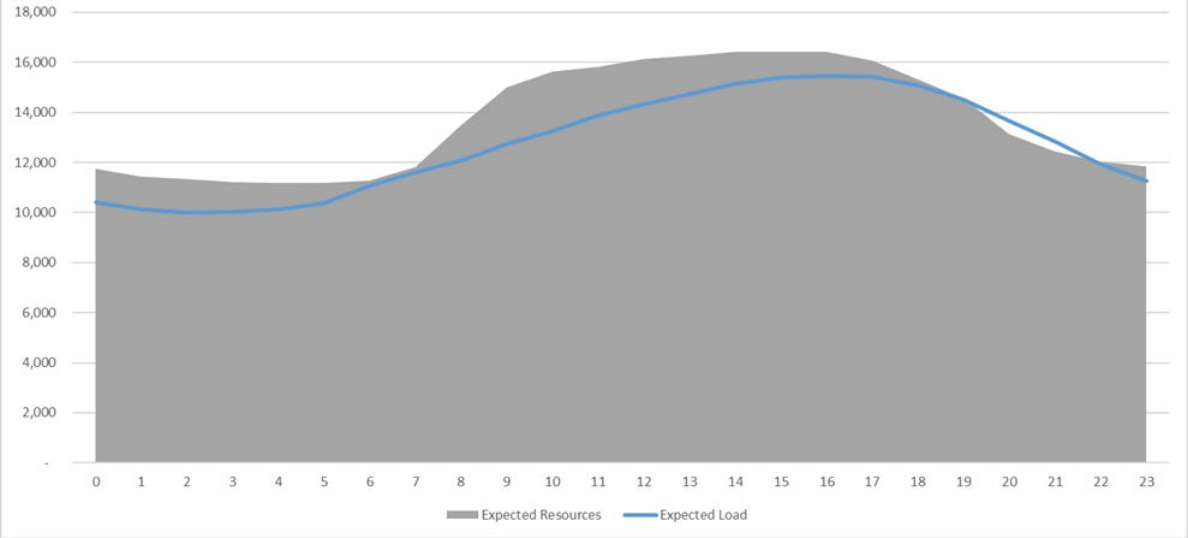
Heat Map Showing Months and Hours Where LOLH is Projected for the WECC-Basin Assessment Area in 2027 and 2029

In WECC’s ProbA modeling, energy transfers from neighboring areas are helping WECC-Basin meet supply deficits, but at times they are insufficient, resulting in the unserved energy and load-loss hours. The chart below shows energy surplus and deficit results from the ProbA 2029 study year. For most of the year, WECC-Basin has excess energy that can be transferred to neighboring areas. During peak summer months, however, more of WECC-Basin’s resources are needed for its own internal demand and, at times, energy deficits that must be met by importing energy from neighbors can exceed 4,000 MW.



Hourly Energy Surplus and Deficits in MW for ProbA 2029 Study Year

The chart below shows a 24-hour look at expected resources and imports versus expected load for ProbA days with the greatest amount of EUE in 2029. LOLH occurs at hour of 17:00 to 21:00 in 2029. This coincides with the evening solar down ramp and the persistence of elevated demand after the peak hour. The profile for the 2027 study year is similar but limited to the 18:00 to 19:00 hour. It should be noted that it is possible for a day to not show the expected load greater than expected resources on an area-wide basis and still have LOLH. This is because the WECC-Basin assessment area includes a conglomerate of BAs, and one of the BAs within the subregion can encounter energy shortfalls in the ProbA that could not be satisfied by imports due to nearby entities not having sufficient surplus energy to transfer.



Load and Resource Profile in MW on an Unserved Energy Day for ProbA 2029 Study Year

Demand

Average annual growth rate for Basin is 2.5%. The primary drivers are data centers and semiconductor manufacturing. Large-load additions in the forecast are 1,223 MW through 2035.

Idaho Power implements a substantial dispatchable DR program focused on the agricultural sector with its Irrigation Peak Rewards Programs. This allows the utility to remotely turn off specific irrigation pumps a minimum of four times during the summer. Participation varies year-to-year based on factors such as the availability of water and program parameters. PacifiCorp states in its most recent IRP that it plans to reach more than 1,100 MW of dispatchable DR by 2042, a 21% increase from its previous plan. The company’s dispatchable DR programs include residential and small commercial air-conditioner load control programs, irrigation load management programs, and approximately 200 MW of evergreen interruptible contracts.

Distributed Energy Resources

BTM DER impacts are reflected in the demand forecasts (net of the DERs). BAs did not report a forecast for BTM resources.

Generation

Operational and planning issues related to generation in WECC-Basin include the following:

- **Aging Thermal Resource Fleet:** An aging thermal resource fleet is a year-round concern for this subregion. Older resources require additional maintenance and can be more prone to forced outages or partial derates. Maintenance is planned years in advance and avoided during summer peak season as much as possible. Quarterly evaluations are done to adjust maintenance schedules as needed.
- **Gas Fleet Derates:** During the winter, gas resources may be derated during extreme cold and precipitation events for equipment issues such as snow-clogged inlet filters. This issue is remedied by monitoring filters and changing them out as needed.
- **Hydro Variability:** Hydro resources in this subregion are subject to seasonal and multi-year fluctuations in water supply. This is a year-round concern that requires persistent monitoring. Regular updates to near-term hydro forecasts ensure system operators can be ready for a range of potential hydro output.
- **Solar Variability:** As the solar capacity in this subregion grows, solar ramps are becoming a concern on summer evenings. Large declines in solar output require the dispatch of flexible resources to meet demand. In addition, during the winter solar generation tends to be significantly lower. BESS that typically charge from solar must charge from other resources. Wind and solar forecasts are used to estimate energy availability to serve load versus the amount available for BESS charging, and other resources are dispatched accordingly.
- **Wind Variability:** Particularly during the winter, the timing and volume of wind generation can vary significantly between forecasts and actuals. This is due to the unpredictable behavior of winter storms that may overspeed turbines, or cold temperatures mixed with moisture that may result in the icing of turbine blades.

Electric-Gas Coordination

Electric-gas coordination in long-term planning studies is considered for at least one Basin entity. For integrated resource planning assumptions, Resource Planners reach out to gas traders to confirm pipeline capability to serve existing and future generating asset needs. Gas supply constraints are not explicitly modeled but are inherently reflected in the GADs data used to develop long-term models.

Maintaining gas supplier diversity is one strategy implemented to reduce the risk of fuel shortages and delivery issues in this subregion. In addition, at least one entity in this subregion participates in the Northwest Mutual Assistance Agreement (NWMAA). This is a voluntary collaboration amongst entities controlling natural gas resources in British Columbia, Alberta, Washington, Oregon, Nevada, and Idaho to cooperate and provide aid to one another when unplanned events occur impacting the gas supply and transportation system. There is frequent communication between system operators regarding gas resources that are planned for operation and pipeline representatives regarding the status of pipelines serving those resources.

Renewable Portfolio, Clean Electricity, and Emissions Standards

Idaho Power serves ~63% of the state's electricity load and is targeting [100% clean electricity by 2045](#); Idaho has no state Renewable Portfolio Standard (RPS) or other clean energy target. Utah has enacted a voluntary renewable portfolio goal of 20% renewable energy by 2025. As of 2023, 15.5% of electricity generated in the state was renewable, putting the state on a path to meet the goal.

Transmission

PacifiCorp's [Energy Gateway Transmission Plan](#) addresses future transmission requirements necessary to serve PacifiCorp's Network Load customer needs. In total, the Energy Gateway Transmission plan, initiated in May 2007, adds approximately 2,000 miles of new transmission lines. Segments A, B, C, F, G and parts of Segment D have been completed. Segment D.3 Bridger/Anticline to Populus has a planned in-service date of 2034; Segment E Populus to Hemingway is beyond the 10-year planning horizon.

The 500 kV Boardman to Hemingway transmission line was first proposed in 2007 and has faced multiple delays. Now, as a joint project between Idaho Power and PacifiCorp (represented as Segment H in PacifiCorp's Energy Gateway transmission plan), the companies intend to break ground this year, with a planned in-service date of 2027. This ~295-mile 500 kV transmission line provides ~1,000 MW of bidirectional capacity increase between the Northwest and Idaho.

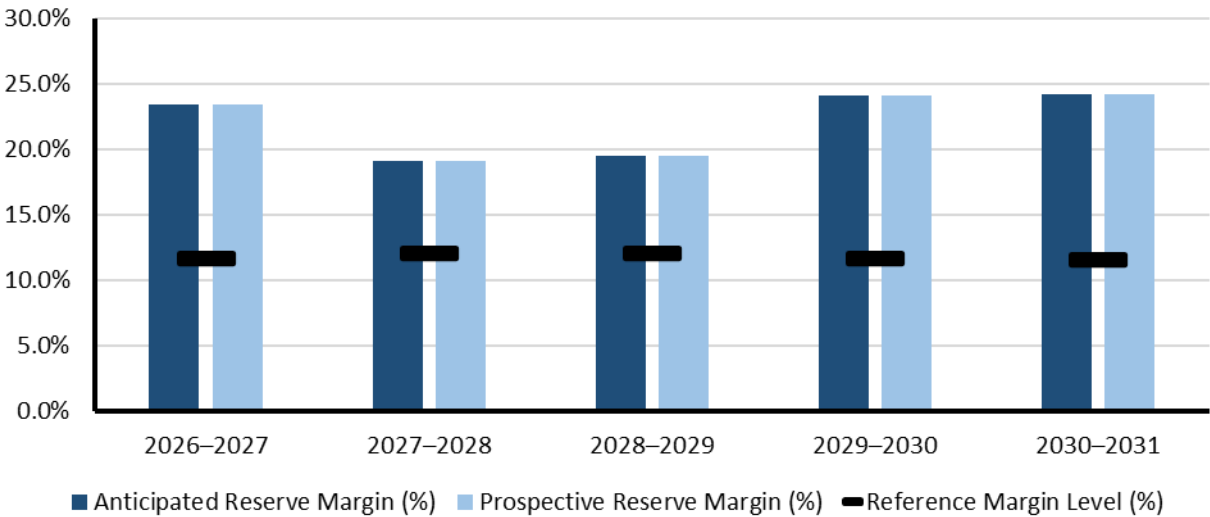


WECC-British Columbia

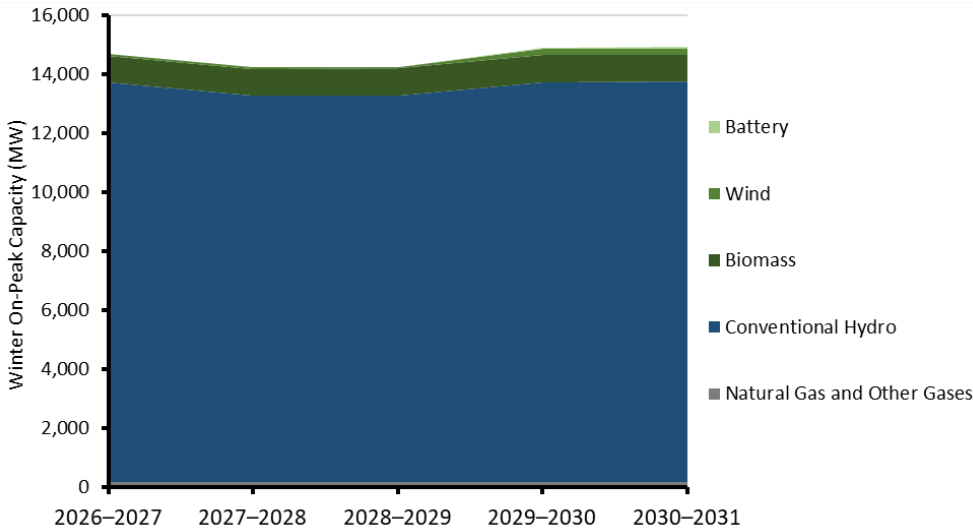
WECC-British Columbia is an assessment area that covers the Canadian province of British Columbia. The province has a geographic area of 944,735 square kilometers (364,764 square miles) and a population of just over 5 million people. BC Hydro is the Planning Entity and Reliability Coordinator for the province of British Columbia and is the principal supplier of electricity for the province. BC Hydro is a provincial Crown corporation and, under provincial legislation, is responsible for the oversight of the British Columbia Bulk Electric System and its interconnections. BC Hydro operates an integrated system supported by 30 hydroelectric plants, approximately 80,000 kilometers of transmission and distribution lines, and 125 contracts with independent power producers. BC Hydro’s transmission system has two interties with neighboring areas—the U.S. state of Washington (see WECC-Northwest) and Alberta (see WECC-Alberta). Peak electricity demand on the BC Hydro system currently occurs during the winter season.

Demand, Resources, and Reserve Margins

Quantity	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2031–2032	2032–2033	2033–2034	2034–2035	2035–2036
Total Internal Demand	11,915	11,970	11,932	12,022	12,028	12,074	12,116	12,177	12,243	12,320
Demand Response	0	0	0	0	0	0	0	0	0	0
Net Internal Demand	11,915	11,970	11,932	12,022	12,028	12,074	12,116	12,177	12,243	12,320
Additions: Tier 1	636	620	625	850	863	863	863	814	863	863
Additions: Tier 2	0	0	0	0	0	0	0	0	0	0
Additions: Tier 3	0	0	0	0	0	0	381	369	381	381
Net Capacity Transfers (WECC Model)	0	0	0	0	0	0	0	0	0	0
Existing-Certain and Net Transfers	14,072	13,638	13,638	14,072	14,072	14,072	14,072	13,638	14,072	14,072
Anticipated Reserve Margin (%)	23.4%	19.1%	19.5%	24.1%	24.2%	23.7%	23.3%	18.7%	22.0%	21.2%
Prospective Reserve Margin (%)	23.4%	19.1%	19.5%	24.1%	24.2%	23.7%	23.3%	18.7%	22.0%	21.2%
Reference Margin Level (%)	11.7%	12.1%	12.1%	11.6%	11.6%	11.6%	11.5%	11.9%	11.5%	11.4%



Planning Reserve Margins



Existing and Tier 1 Resources

WECC-British Columbia Highlights

- WECC-British Columbia’s anticipated reserve margin does not fall below the RML during the 2025–2035 timeframe.
- British Columbia’s annual demand is projected to grow 10% over the next 10 years. Summer peak hour demand is projected to grow 4% and winter peak hour demand is projected to grow 3% over the same period.
- British Columbia is anticipated to add 2.6 GW nameplate capacity of Tier 1 solar, wind, conventional hydro, and battery resources over the next 10 years. Hydro variability is the biggest operational issue related to generation in WECC-British Columbia.
- BC Hydro’s most recent 10-year capital plan allocates \$36 billion (CAD) for infrastructure investments across BC to address load growth and increased customer connections, dam safety, reliability, and the sustainment of existing assets.

WECC-BC Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031
Natural Gas	170	170	170	170	170
Biomass	900	903	903	900	900
Wind	73	59	59	222	222
Conventional Hydro	13,544	13,104	13,109	13,560	13,573
Other	22	22	22	22	22
Battery	0	0	0	49	49
Total MW	14,708	14,258	14,263	14,922	14,935

WECC-British Columbia Assessment

Planning Reserve Margins

BC Hydro has used the one-day-in-10-years LOLE standard since 1975. Using a probabilistic model, BC Hydro concluded in its updated 2021 IRP that a 12% PRM of dependable generating capacity was required to ensure system resource adequacy. WECC-British Columbia’s ARM does not fall below the RML during the 2025–2035 time frame.

There have, however, been changes to policies that might affect planning and procurement over the next 10 years. The Clean Electricity Regulations were finalized in December 2024, which delayed the nationwide net-zero electricity target from 2035 to 2050. Provincial policies in BC that might affect resource planning and procurement include the Renewable Energy Projects Act (May 2025), (which streamlines permitting and grants the BC Energy Regulator broader approval powers for wind, solar, and transmission projects) and the BC Clean Power Action Plan (which aims to double clean electricity supply by 2050 and includes a new biennial procurement cycle for renewable resources).

BC Hydro is included in the Powerex footprint in WRAP. The WRAP defines an adequate reserve margin for its footprint for an 18-month forward period based on a loss of load expectation reliability threshold of one event day in 10 years. WRAP uses an ELCC methodology to determine capacity contribution in its analysis. The WRAP is a non-binding program for Winter 2025–26 but is currently planned to transition to a fully binding program with deficiency charges sometime in 2027. For [2025–2026 Winter](#), monthly PRMs for the Northwest WRAP subregion (called Mid-Columbia) range between 11.7% and 27.2%. For [2026 Summer](#), a PRM range between 14.2% and 22.3% is reported.

Energy Assessment, including non-peak hour risk

ProbA Results

British Columbia does not show any LOLH or EUE in 2027 or 2029.

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	0	0	0
NEUE (ppm)	0.00	0.00	0.00
LOLH (hours per Year)	0.00	0.00	0.00
* Provides the 2024 ProbA Results for Comparison			

British Columbia did not have LOLH in 2027 or 2029; therefore, no additional reporting or visualizations are provided.

Demand

British Columbia’s annual demand is projected to grow 10% over the next 10 years. Summer peak hour demand is projected to grow 4% and winter peak hour demand is projected to grow 3% over the same period. The primary driver for demand growth in British Columbia is natural gas processing. Significant, but uncertain, effects on demand are also expected because of commercial and residential electrification and simultaneous advances in EE in those two sectors.

Distributed Energy Resources

BC Hydro has a net metering program. Net metering for residential and commercial customer projects are up to 100 kW. The net metering program has no annual energy volume target.

Generation

With its abundant hydro, British Columbia is already approximately 95% carbon free. The [CleanBC Roadmap](#) states, “By 2030, BC will phase out BC Hydro’s last gas-powered facility so the electricity we make is 100% clean.”

British Columbia is anticipated to add 2.6 GW nameplate capacity of Tier 1 solar, wind, conventional hydro, and battery resources over the next 10 years. Tier 3 additions include 500 MW of conventional hydro.

Hydro variability is the main operational and planning issue related to generation in WECC-British Columbia. Over 80% of British Columbia’s capacity is comprised of hydro resources, making hydro variability a concern year-round. While parts of British Columbia remain in drought classification as of the end of October 2025, many of the province’s basins have recovered and conditions are now better for this time of year than in the prior two years. Drought indices for 2026–2027 remain dependent on this year’s snowpack accumulation and subsequent seasonal rain. At this time, it is too soon to forecast whether drought conditions will persist or continue easing into next season for the BC Hydro integrated system. Power imports from the United States to British Columbia assist in maintaining water storage levels. More than a fifth of the power in the province was imported from the United States in 2024. Increasing electrification trends coupled with potential continued drought conditions may exacerbate the need for imports to the region in the future.

As BC is working to phase out its last natural-gas-fired power generation units over the next five years, electric-gas coordination issues are not anticipated for power supply. However, BC’s natural gas operators are part of the Northwest Mutual Assistance Agreement. This is a voluntary collaboration amongst entities controlling natural gas resources in British Columbia, Alberta, Washington, Oregon, Nevada, and Idaho to cooperate and provide aid to each other when unplanned events occur impacting the gas supply and transportation system. There is frequent communication between system operators regarding gas resources that are planned for operation and pipeline representatives regarding the status of pipelines serving the jurisdictions covered by the agreement.

Energy Storage

BC Hydro is expected to add 50 MW of Tier 1 battery energy storage over the next 10 years. Battery storage in the West is generally being relied on to help mitigate ramping risk from afternoon net demand due to increasing penetrations of solar.

Energy Transfers

According to NERC’s [*ITCS Canadian Analysis*](#), the total simultaneous transfer capability into the British Columbia transmission planning regions from all its neighbors is 2,897 MW in 2024 Summer and 3,078 MW in 2024/25 Winter. These values translate to approximately 31% of peak summer load and 27% of peak winter load in the analysis years. The two interfaces include connections with the U.S. state of Washington (see WECC-Northwest) and Alberta (see WECC-Alberta).

Transmission

BC Hydro’s most recent 10-Year Capital Plan allocates \$36 billion (CAD) for infrastructure investments across BC to address load growth and increased customer connections, dam safety, reliability, and the sustainment of existing assets. These changes are expected to shorten development lead-times, boost renewable energy procurement, and enhance grid infrastructure planning.

Reliability Issues

Congestion of the transmission systems supplying high-growth areas of the Lower Mainland and Vancouver Island could be a potential future emerging reliability issue. Load growth due to electrification, expected population increases, and industrial expansion could couple with increased variability in load caused by extreme weather, wildfires, atmospheric rivers, and heat waves or cold snaps, to add stress to the transmission network. Lastly, aging infrastructure could add to higher forced outage risk if supply chain disruptions create project delays, as has been occurring across the Western Interconnection in recent years.

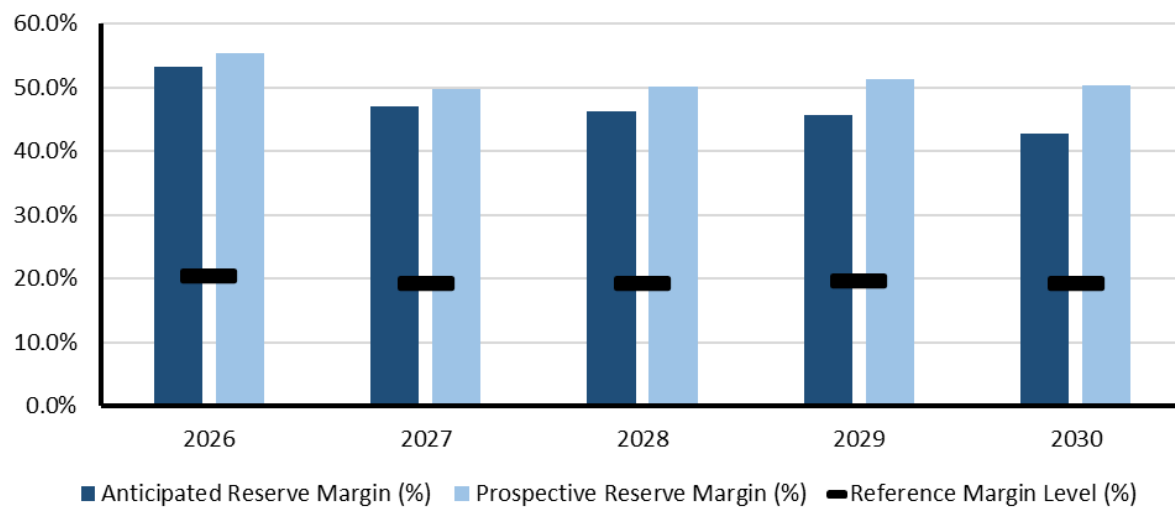


WECC-California

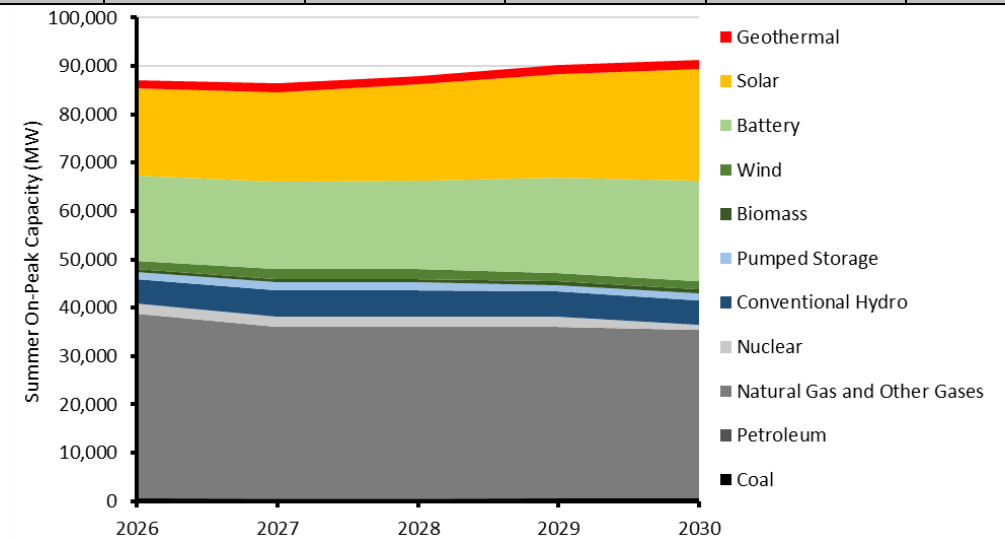
WECC-California is a summer-peaking assessment area in the Western Interconnection that includes most of California and a small section of Nevada. The assessment area has a population of over 42.5 million people. The area includes the California ISO, Los Angeles Department of Water and Power, Turlock Irrigation District, and the Balancing Area of Northern California. It has 32,712 miles of transmission. WECC is responsible for coordinating and promoting BES reliability in the Western Interconnection. WECC's 329 members include 40 BAs, representing a wide spectrum of organizations with an interest in the BES. Serving an area of nearly 1.8 million square miles and more than 84.5 million customers, it is geographically the largest and most diverse Regional Entity. *Note: The 2025 LTRA includes a new assessment area map for the U.S. Western Interconnection. The new assessment area boundaries provide more geographic detail of reliability risk information. WECC-California is a new assessment area in 2025 that was part of WECC-CA/MX in the 2024 LTRA.*

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	58,165	60,060	61,547	63,261	65,221	66,879	68,315	69,759	71,373	73,017
Demand Response	756	764	775	783	795	799	812	823	836	836
Net Internal Demand	57,409	59,296	60,772	62,478	64,426	66,079	67,504	68,936	70,537	72,182
Additions: Tier 1	11,558	13,202	14,765	17,206	19,945	19,945	21,532	22,541	23,771	25,622
Additions: Tier 2	1,288	1,552	2,388	3,489	4,974	4,974	6,509	8,475	9,208	9,244
Additions: Tier 3	10	10	10	10	557	557	557	562	557	557
Net Capacity Transfers (WECC Model)	561	583	651	639	541	234	310	314	298	287
Existing-Certain and Net Transfers	76,371	73,982	74,050	73,773	71,969	70,585	70,661	70,925	70,649	70,613
Anticipated Reserve Margin (%)	53.2%	47.0%	46.1%	45.6%	42.7%	37.0%	36.6%	35.6%	33.9%	33.3%
Prospective Reserve Margin (%)	55.4%	49.6%	50.1%	51.2%	50.4%	44.5%	46.2%	47.9%	46.9%	46.1%
Reference Margin Level (%)	20.3%	19.2%	19.3%	19.7%	19.3%	19.1%	18.9%	17.8%	18.3%	18.0%



Planning Reserve Margins



Existing and Tier 1 Resources

WECC-California Highlights

- The ARM does not fall below the RML. Further, ProbA results indicate that planned resources can reliably meet demand during the studied years of 2027 and 2029.
- The California Public Utilities Commission (CPUC) recently increased the PRM requirement for 2026 and 2027 from 17% to 18%. [CPUC’s ruling](#) also maintains procurement targets that provide additional summer reliability resources by ordering IOUs to procure resources of 1,260 to 2,300 MW for the months of June through October in 2026 and 2027.

WECC-California Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	466	466	466	466	466
Coal*	16	16	16	16	16
Petroleum	103	103	103	103	103
Natural Gas	38,144	35,507	35,507	35,468	34,837
Natural Gas*	38,144	34,994	34,994	35,468	34,837
Biomass	734	745	749	749	749
Solar	18,126	18,574	19,936	21,506	23,065
Wind	1,643	1,991	2,000	1,650	1,650
Geothermal	1,809	1,808	1,808	1,809	1,809
Conventional Hydro	5,112	5,426	5,426	5,112	5,112
Pumped Storage	1,401	1,549	1,549	1,401	1,401
Nuclear	2,152	2,151	2,151	2,152	1,076
Other	194	194	194	194	194
Battery	17,486	18,088	18,275	19,731	20,911
Total MW	87,368	86,601	88,164	90,340	91,372
Total MW*	86,918	85,637	87,200	89,890	90,922
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to be included in system plans are removed from the resource projection where marked.					

Planning Reserve Margins

The ARM does not fall below the RML. The California Public Utilities Commission (PUC) recently released a PRM increase for 2026 and 2027 from 17% to 18%. The ruling also increases the PRM procurement target from 1,260 to 2,300 MW for the months of June through October for 2026 and 2027 (divided across the IOUs). Note, the CPUC’s reserve margins are not used in WECC’s methodology for the LTRA.

Energy Assessment, including non-peak hour risk

WECC performs a probabilistic resource adequacy analysis using the MAVRIC model. MAVRIC is WECC’s internally developed modeling tool that performs energy based probabilistic assessments that support NERC’s LTRA and seasonal assessments, as well as WECC’s WARA.

ProbA Results

The ProbA found that planned resources meet demand and reliability margins for all hours (no EUE or LOLH).

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	N/A	0	0
NEUE (ppm)	N/A	0.00	0.00
LOLH (hours per Year)	N/A	0.00	0.00
* No prior results as the assessment area is new for the 2025 LTRA.			

For 2027 and 2029, the peak hour is projected to occur in early September at hour beginning 16:00. California does not show any LOLH or EUE in either 2027 or 2029. No risk period visualizations are included for this subregion as there were no identified risk hours.

Demand

Average annual demand growth rate for WECC-CA is 2.4%. The primary drivers are transportation electrification and incremental load for extreme heat events. Large-load additions in the forecast are 4,993 MW through 2035.

Demand-Side Management

DR accounted for about 2.6% (1,400 MW) of total system resource adequacy capacity in the summer of 2024 compared to about 3 to 4% in the previous four summers. This drop is mainly due to a change in CPUC rules removing the PRM and transmission adders totaling over 11% previously applied to DR capacity.

DR was supplied by CPUC-regulated utility programs, non-utility third-party programs, and non-CPUC jurisdictional load-serving entities (municipal utilities, etc.). Utility DR accounts for about 76% of DR used to meet resource adequacy requirements. About 85% of this capacity was bid into the real-time market during the most critical hours of summer 2024. When dispatched, this category reported curtailing about 81% of scheduled load reductions.

Non-utility (third party) DR accounts for about 18% of DR used as resource adequacy capacity requirements, with actual load reductions of about 54% of scheduled. However, during some hours, this sector exceeded the scheduled level.

Non-CPUC jurisdictional load serving entities (municipal utilities, etc.) utilize an average of about 75 MW of DR—or about 6% of DR used to meet total ISO system resource adequacy requirements. Since this capacity is not bid or scheduled into the ISO market, its performance cannot be verified.

Distributed Energy Resources

A recent policy change in California significantly increased the payback period for residential BTM PV. As predicted, installations of residential rooftop solar systems have fallen to near three-year lows over the past year; existing systems were grandfathered in. Now, the California legislature is considering a bill to undo that grandfathering by reducing those existing net metering contracts with IOUs from 20 years to 10. AB 942 would impact the value of solar on the nearly 2 million homes that have installed panels years ago by shifting them to the “net billing tariff” that pays approximately 75% lower rates for energy sent back to the grid. Given California’s shifting policy environment, it is difficult to predict future adoption of BTM PV solar.

Generation

- **Aging Thermal Resource Fleet:** During the summer, aging thermal resources can become a concern for this subregion. Older resources require additional maintenance and can be more prone to forced outages or partial derates. In addition, thermal plant and system operators are becoming increasingly hard to replace, as there appears to be difficulty in finding personnel with the necessary experience to fill these rolls. Succession planning is becoming an integral part of successful thermal plant operation.
- **Behind-the-Meter Variability:** BTM output variability can be an operational concern for this subregion year-round. BTM resource generation can be masked from the transmission operator and BA. For example, localized cloud coverage limiting BTM output has been seen to increase demand by 200 MW, requiring unplanned additional resources to be dispatched.

Flexible operating reserves remain on standby to address the uncertainty associated with BTM output.

- **BESS Fires:** BESS fires have occurred in California. These are isolated events that can render a BESS inoperable. Electrical faults, manufacturing defects, degradation due to aging, and gas buildup can all lead to fires. New technologies for passive fire suppression, such as immersion cooling, are being developed to reduce the occurrence of BESS fires.
- **Gas Fleet Derates:** Gas resources in this subregion can be derated during extremely hot weather in the summer due to ambient conditions. Quantifying gas fleet limitations and ensuring there are alternative resources available to meet demand is paramount.
- **Hydro Variability:** Primarily during the summer season, variations in annual precipitation can have a significant impact on water supply. Extended droughts can reduce head pressure, directly resulting in the reduction of hydro capacity. Improvements in hydro models for run off and precipitation are in progress to address these concerns. For resource adequacy models, a 1-in-5 dry-year planning scenario is used.
- **Inertia Decline on System:** Local and federal regulations have driven a reduction in traditional spinning mass generators, which has exacerbated frequency deviations in California. Operating plans are being updated with the necessary steps to mitigate this issue. This issue is observed year round.
- **Solar Variability:** Solar output variability is a concern year round. Spring, fall, and winter often have overcast cloud coverage in California, which can make solar output difficult to forecast. Summer evenings tend to be a time of day when demand is elevated but solar output declines. Weather forecasts are heavily monitored, and net load uncertainty is accounted for with regulation, flexible ramp, and future imbalance reserve requirements.
- **Wind Variability:** Wind variability is an operational concern year round. Toward the end of summer, the beginning of winter, and the beginning of spring, Santa Ana Winds can create overspeed conditions for wind turbines, limiting their output. Weather forecasts are heavily monitored, and net load uncertainty is accounted for with regulation, flexible ramp, and future imbalance reserve requirements.

Electric-Gas Coordination

Most entities in California consider electric-gas coordination in long-term planning studies. Resource Planners collaborate with gas supply teams to gather assumptions on forecasted gas deliveries and pricing. Constraints are not directly incorporated in resource planning studies.

Operating Procedure 4120 ensures that CAISO provides daily estimated gas usage reports to gas transmission operators (GTO). These are used as the basis for gas curtailment event planning. This procedure helps mitigate risks associated with gas supply limitations that may impact generation resources and applies to both real-time and day-ahead operations. In addition, participants of RC West have formed the Real-Time Working Group (RTWG). This group convenes prior to extreme weather events to prepare for potential gas supply interruptions. California entities that are part of RC West also participate in the Northwest Mutual Assistance Agreement (NWMMA). Communication protocols include following NERC Reliability Standard COM-002-4 which contains predefined communication procedures. In addition, plant operators work directly with power supply and gas schedulers to coordinate scheduling and dispatch of gas generating resources.

Renewable Portfolio, Clean Electricity, and Emissions Standards

California has a mandate for its electricity supply to be 60% carbon free by 2030 and is currently on track to meet that level. The requirement for 100% carbon free is set at 2045.

Transmission

The ITCS report showed that in a heat wave Northern California may be energy-deficient.

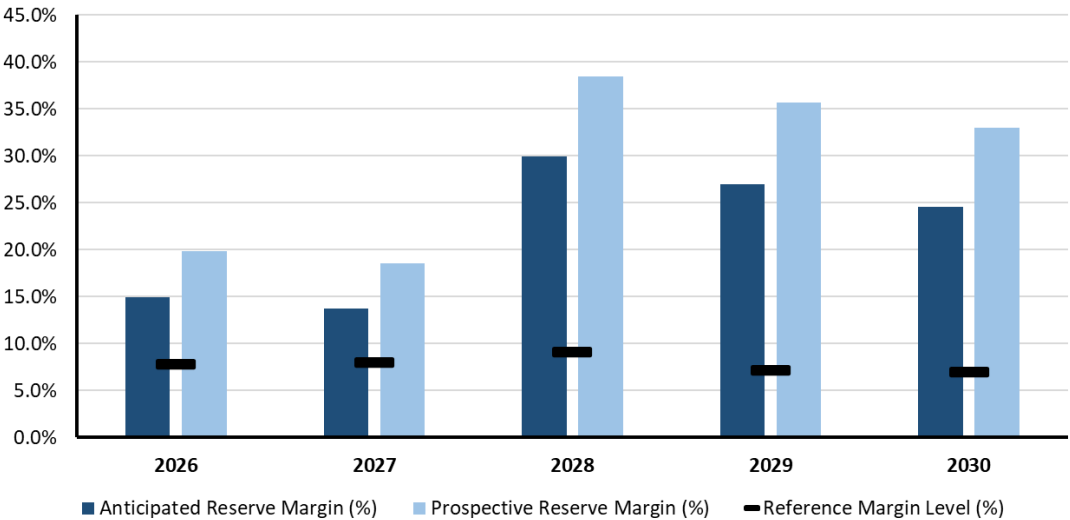


WECC-Mexico

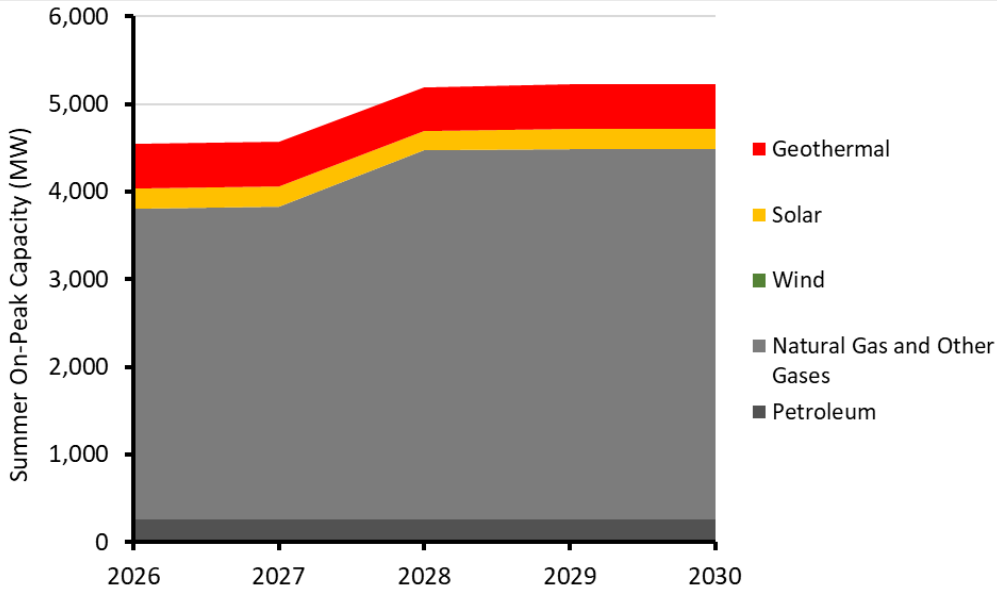
WECC-Mexico is a summer-peaking assessment area in the Western Interconnection that includes the northern portion of the Mexican state of Baja California, which has a population of 3.8 million people and includes CENACE. It has 1,568 miles of transmission. WECC is responsible for coordinating and promoting BES reliability in the Western Interconnection. WECC’s 329 members include 40 BAs, representing a wide spectrum of organizations with an interest in the BES. Serving an area of nearly 1.8 million square miles and more than 84.5 million customers, it is geographically the largest and most diverse Regional Entity. *Note: The 2025 LTRA includes a new assessment area map for the U.S. Western Interconnection. The new assessment area boundaries provide more geographic detail of reliability risk information. WECC-Mexico is a new assessment area in 2025 that was part of WECC-CA/MX in the 2024 LTRA.*

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	3,953	4,135	4,315	4,495	4,675	4,855	5,035	5,215	5,395	5,575
Demand Response	0	0	0	0	0	0	0	0	0	0
Net Internal Demand	3,953	4,135	4,315	4,495	4,675	4,855	5,035	5,215	5,395	5,575
Additions: Tier 1	717	722	1,396	1,400	1,400	1,400	1,400	1,400	1,400	1,400
Additions: Tier 2	196	198	367	392	392	392	392	367	392	392
Additions: Tier 3	0	0	0	0	0	0	0	0	0	0
Net Capacity Transfers (WECC Model)	0	131	410	482	600	600	600	600	600	600
Existing-Certain and Net Transfers	3,825	3,982	4,209	4,307	4,425	4,425	4,425	4,409	4,425	4,425
Anticipated Reserve Margin (%)	14.9%	13.8%	29.9%	27.0%	24.6%	20.0%	15.7%	11.4%	8.0%	4.5%
Prospective Reserve Margin (%)	19.9%	18.6%	38.4%	35.7%	33.0%	28.1%	23.5%	18.4%	15.2%	11.5%
Reference Margin Level (%)	7.8%	8.0%	9.1%	7.2%	7.0%	6.8%	6.7%	7.4%	6.4%	6.3%



Planning Reserve Margins



Existing and Tier 1 Resources

WECC-Mexico Highlights

- Centro Nacional de Control de Energía (CENACE) is adding three natural-gas-fired combustion turbine generators (totaling 780 MW in summer capacity) by Summer 2026, increasing planned reserves to above RMLs. An additional 740 MW of natural-gas-fired capacity is in development between 2026 and 2027.

WECC-Mexico Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	0	0	0	0	0
Petroleum	259	261	258	259	259
Natural Gas	3,540	3,566	4,212	4,224	4,224
Biomass	0	0	0	0	0
Solar	229	231	214	229	229
Wind	7	5	6	7	7
Geothermal	506	510	505	506	506
Conventional Hydro	0	0	0	0	0
Nuclear	0	0	0	0	0
Other	0	0	0	0	0
Battery	0	0	0	0	0
Total MW	4,542	4,573	5,195	5,225	5,225

WECC-Mexico Assessment

Planning Reserve Margins

The ARM is above the RML until 2035, the last year of the assessment period.

Non-Peak Hour Risk, Energy Assurance, Probabilistic-Based Assessments

WECC performs a probabilistic resource adequacy analysis using the MAVRIC model. MAVRIC is WECC’s internally developed modeling tool that performs energy based probabilistic assessments that support NERC’s LTRA and seasonal assessments, as well as WECC’s WARA.

The ProbA found that planned resources meet demand and reliability margins for all hours (no EUE or LOLH).

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	N/A	0	0
NEUE (ppm)	N/A	0.00	0.00
LOLH (hours per Year)	N/A	0.00	0.00
* No prior results as the assessment area is new for the 2025 LTRA.			

Demand

Average annual demand growth rate for WECC-Mexico is 4.3%. Large-load additions in the forecast are 161 MW through 2035.

Generation

Operational and planning issues related to generation in WECC-Mexico include the following:

- Unplanned Outages of Thermal Sites: High loading on Path 45 (See: [WECC Path Rating Catalog](#)) coupled with outages or derates to large thermal assets in this assessment area can result in the declaration of an EAA and a request for assistance from RC West. This risk is amplified in the summer when demand is highest.
- Electric-Gas Coordination: Electric-gas coordination is considered in long-term planning studies for the WECC-Mexico area. Current and future gas projects and constraints that could compromise supply to generators are incorporated in planning studies. Constant gas supply monitoring is conducted to ensure generating assets remain reliable throughout the year. Multiple suppliers are also available to generators in WECC-Mexico. This allows for supply redundancy if one supplier is experiencing limitations. Communication between gas suppliers and system operators includes the sharing of gas infrastructure maintenance information and consumption forecasts which are provided on a weekly, monthly, and annual cadence.

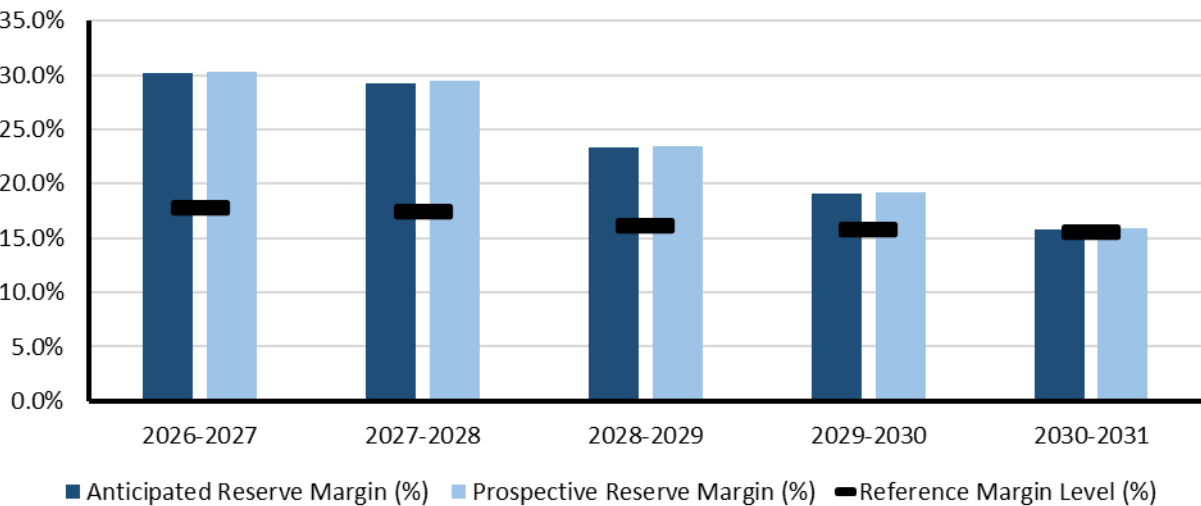


WECC-Northwest

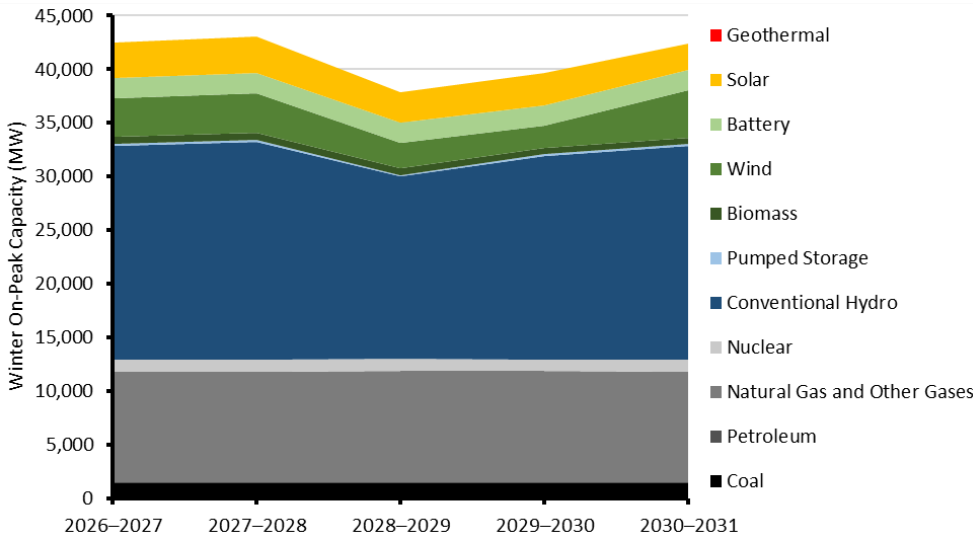
WECC-Northwest is a winter-peaking assessment area in the WECC Regional Entity. The area includes Montana, Oregon, and Washington and parts of northern California and northern Idaho. The population of the area is approximately 13.6 million. It has 32,751 miles of transmission. WECC is responsible for coordinating and promoting BES reliability in the Western Interconnection. WECC’s 329 members include 40 BAs, representing a wide spectrum of organizations with an interest in the BES. Serving an area of nearly 1.8 million square miles and more than 84.5 million customers, it is geographically the largest and most diverse Regional Entity. *Note: The 2025 LTRA includes a new assessment area map for the U.S. Western Interconnection. The new assessment area boundaries provide more geographic detail of reliability risk information. WECC-Northwest is a new assessment area in 2025 that was part of a larger WECC-NW footprint in the 2024 LTRA.*

Demand, Resources, and Reserve Margins

Quantity	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031	2031–2032	2032–2033	2033–2034	2034–2035	2035–2036
Total Internal Demand	34,426	34,930	36,038	37,017	37,939	38,821	39,455	40,083	40,563	41,064
Demand Response	30	30	30	30	30	30	30	30	30	30
Net Internal Demand	34,396	34,900	36,008	36,987	37,909	38,791	39,425	40,053	40,533	41,034
Additions: Tier 1	3,463	3,463	3,219	3,219	3,219	3,219	3,463	3,232	3,221	3,217
Additions: Tier 2	10	49	56	56	56	56	49	56	56	56
Additions: Tier 3	697	830	939	4,958	5,389	5,605	6,267	5,963	5,921	5,903
Net Capacity Transfers (WECC Model)	7,242	7,630	7,316	7,066	6,896	6,825	6,825	6,825	6,630	5,841
Existing-Certain and Net Transfers	41,332	41,653	41,169	40,828	40,652	40,564	40,724	40,558	40,360	39,573
Anticipated Reserve Margin (%)	30.2%	29.3%	23.3%	19.1%	15.7%	12.9%	12.1%	9.3%	7.5%	4.3%
Prospective Reserve Margin (%)	30.3%	29.4%	23.4%	19.2%	15.9%	13.0%	12.2%	9.5%	7.7%	4.4%
Reference Margin Level (%)	17.8%	17.4%	16.1%	15.8%	15.5%	15.3%	15.9%	15.0%	14.9%	14.8%



Planning Reserve Margins



Existing and Tier 1 Resources

WECC-Northwest Highlights

- The ARM falls below the RML starting in Winter 2031–2032. The assessment area would need additional resources to meet resource adequacy criteria. More details on members participating in the WRAP can be found on the [WRAP Area Map](#).
- For 2027 and 2029, the peak hour is projected to occur in January at hour beginning 10:00.
- Resource adequacy risk is not significant in the Northwest for 2027.
- In 2029, the Northwest subregion shows 8,080 MWh of EUE, with approximately 85% of that occurring between hours beginning 14:00–19:00 in August. Though the magnitude of EUE is greatest in the summer months, LOLH occurs at a greater frequency in the winter months, particularly in January.
- The majority of EUE occurs during the summer from hours beginning 17:00–19:00, during which period demand is elevated but solar output is dissipating.

WECC-Northwest Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026–2027	2027–2028	2028–2029	2029–2030	2030–2031
Coal	1,516	1,516	1,475	1,475	1,475
Petroleum	97	97	95	95	95
Natural Gas	10,539	10,533	10,480	10,480	10,480
Biomass	657	617	615	536	536
Solar	1,545	1,544	1,622	1,622	1,622
Wind	2,149	2,149	1,319	1,311	1,311
Geothermal	4	4	4	4	4
Conventional Hydro	17,855	17,835	18,279	18,275	18,270
Pumped Storage	146	146	149	149	149
Nuclear	1,112	1,112	1,108	1,108	1,108
Battery	1,934	1,934	1,927	1,927	1,927
Total MW	37,553	37,486	37,072	36,981	36,976

WECC-Northwest Assessment

Planning Reserve Margins

The ARM falls below the RML starting in Winter 2031–2032. Additional resources will be needed to avoid shortfalls in planning reserves and prevent energy risks from emerging.

Non-Peak Hour Risk and Energy Assurance

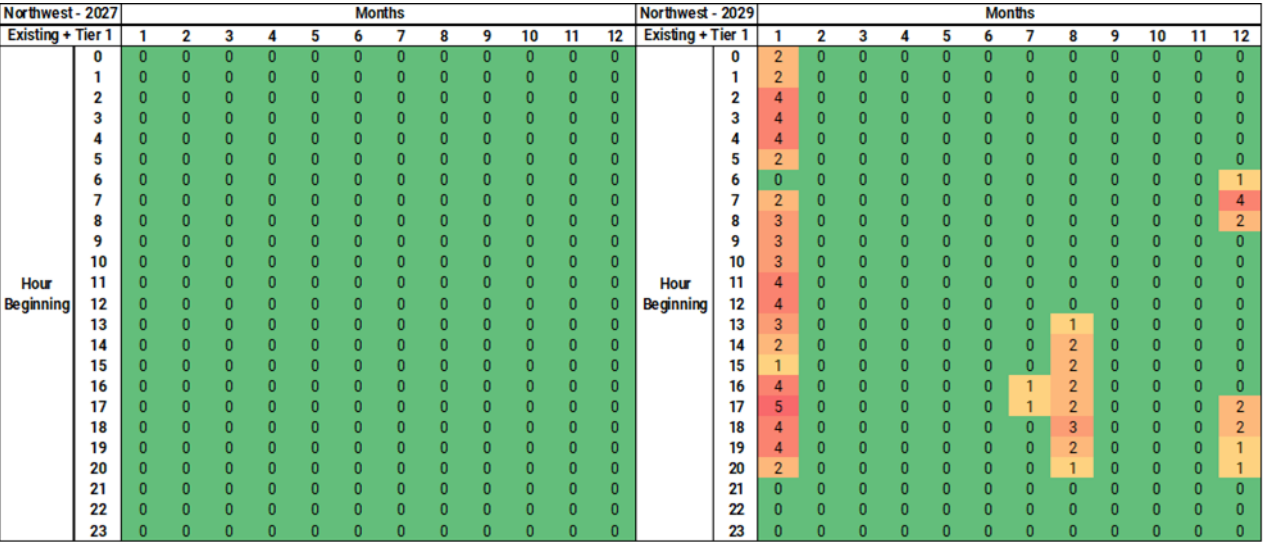
WECC performs a probabilistic resource adequacy analysis using the MAVRIC model. MAVRIC is WECC’s internally developed modeling tool that performs energy based probabilistic assessments that support NERC’s LTRA and seasonal assessments, as well as WECC’s WARA.

ProbA Results

While the ARM does not fall below the RML during the 2026–2030 time frame, the ProbA results based on current resource projections and demand forecasts indicate significant EUE and LOLH by 2029. As resource additions struggle to keep up with rising demand and expected generator retirements, reflected in falling ARMs over the assessment period, unserved energy and load-loss hours increase in the ProbA results.

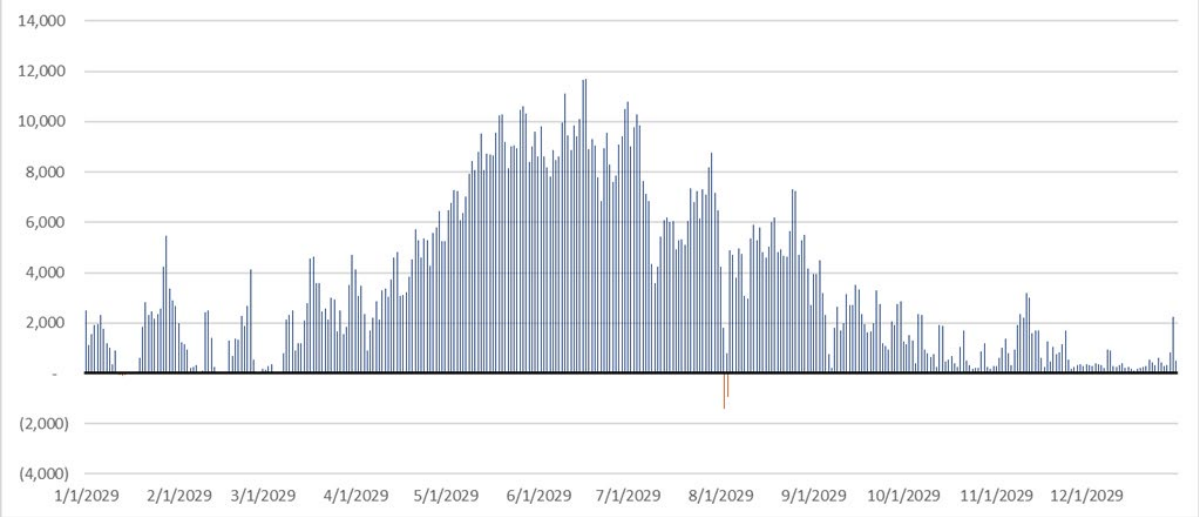
Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	N/A	0	8,080
NEUE (ppm)	N/A	0	36.64
LOLH (hours per Year)	N/A	0	85.00
* No prior results as the assessment area is new for the 2025 LTRA.			

Resource adequacy concerns in the U.S. Northwest can arise in the summer and winter seasons. Peak demand occurs in the winter months. In the ProbA results illustrated in the following heat map figure, load-loss hours occur at a greater frequency during winter high-demand periods. The summer months also have an emerging risk of shortfalls according to the ProbA: The 2029 study year had approximately 85% of identified unserved energy occurring between the afternoon-to-evening hours of mid to late summer. The values in the heat map are the number of hours from the MAVRIC simulations that resources fall short of demand and reliability margins in the study year.



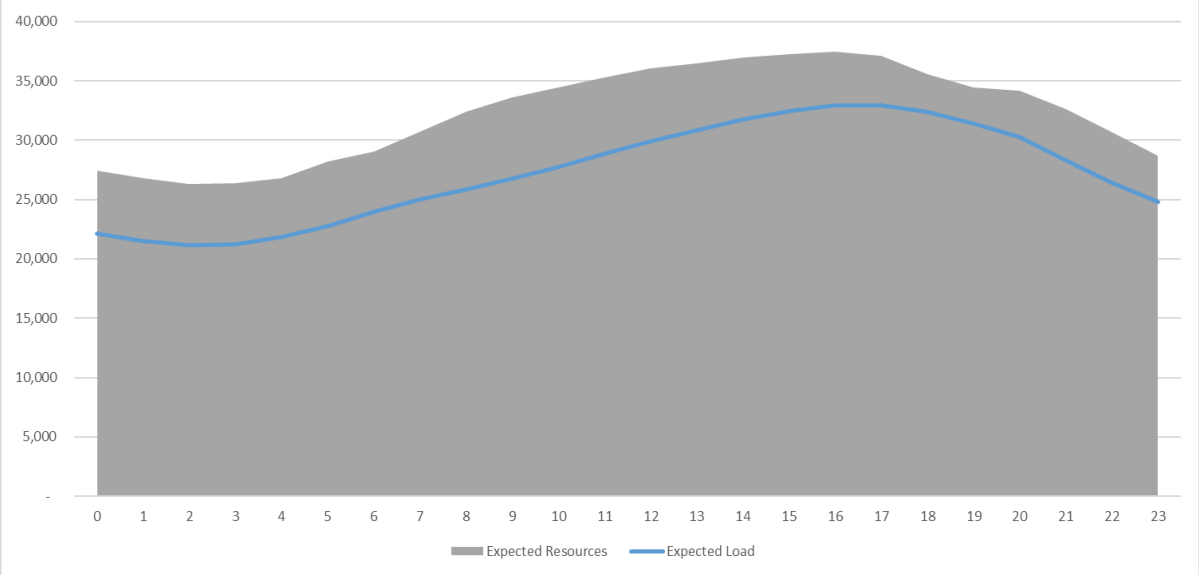
Heat Map Showing Months and Hours Where LOLH is Projected for the WECC-Northwest Assessment Area in 2027 and 2029

In WECC’s ProbA modeling, energy transfers from neighboring areas are helping WECC-Northwest meet supply deficits, but at times they are insufficient, resulting in the unserved energy and load-loss hours. The chart below shows energy surplus and deficit results from the ProbA 2029 study year. For most of the year, WECC-Northwest has excess energy that can be transferred to neighboring areas. Winter months are when WECC-Northwest’s excess energy is at its lowest, and at times in the 2029 study year internal resources are not sufficient for demand. In summer months, WECC-Northwest is projected to have its highest amount of excess energy, though these supplies can still be insufficient for modeled demand during extreme heat events. Such occurrences can cause deficits represented in the figure below, and energy can go unserved when neighboring areas do not have surplus energy to transfer.



Hourly Energy Surplus and Deficits in MW for ProbA 2029 Study Year

The chart below shows a 24-hour look at expected resources and imports versus expected load for ProbA days with the greatest amount of EUE in 2029. For the Northwest, this occurs in mid-to-late summer. LOLH occurs from hours beginning 14:00 through 19:00. The majority of EUE during these hours occurs from hours beginning 17:00–19:00, during which period demand remains elevated whereas solar output dissipates. There is no LOLH in 2027. It should be noted that it is possible for a day to not show the expected load greater than expected resources on an area-wide basis and still have LOLH. This is because the WECC-Northwest assessment area includes a conglomerate of BAs, and one of the BAs within the subregion can encounter energy shortfalls in the ProbA that could not be satisfied by imports due to nearby entities not having sufficient surplus energy to transfer.



Load and Resource Profile in MW on an Unserved Energy Day for ProbA 2029 Study Year

Demand

Average annual demand growth rate for WECC-Northwest is 2.7%. The primary drivers are data centers, residential electrification, residential customer growth, transportation electrification, and semiconductor manufacturing. Large-load additions in the forecast are 7,652 MW through 2035.

Distributed Energy Resources

In the Northwest, Oregon IOUs continue to offer net metering with carryover credits within a calendar year and annual excess credits going to low-income programs. However, the state’s largest IOU has proposed a change that largely mirrors California’s revised lower credits; if adopted, this would slow the rate of installations in Oregon as well (where the latitude and climate already lengthen the customer’s payback period relative to California).

In Washington, utilities have the option to propose a BTM PV credit that is less than the retail rate once they reach a threshold of 4% of their 1996 peak load. The current program is in effect until at least 2029. However, given the progress toward the 4% penetration rate (below), that year may trigger a slowdown in new installations of BTM PV.

Generation

Operational and planning issues related to generation in WECC-Northwest include the following:

- **Aging Thermal Resource Fleet:** A year-round concern for this subregion is an aging thermal resource fleet. Older resources require additional maintenance and can be prone to forced outages or partial derates. Necessary maintenance and capital expenditures are made to ensure these generators provide reasonable performance when called upon. Planned maintenance outages for these resources may be done at a higher frequency during the shoulder months to avoid unplanned outages during the summer months. However, major upgrades to aging infrastructure reduce system capability for extended periods of time, increasing reliance on imports. Supply chain delays and staffing issues can cause planned outages to extend well beyond their anticipated end date. Staffing shortages have been noted by multiple entities in the Northwest.
- **Hydro Variability:** The Northwest has a large share of hydro resources in its portfolio making hydro generating capability a concern year-round. Seasonal hydro variability and below average inflows observed by some entities in this region from April through November of last year resulted in projects being ran at minimum flow. Underperforming hydro resources can result in entities relying heavily on imports to meet peak load hours. During extreme cold conditions, run of river hydro sites can also be derated due to icing. Performing maintenance during shoulder seasons can help keep hydro on-line during the winter and summer seasons. Improving hydro forecasting for short- and long-term planning models can assist system dispatchers with daily operating plans and resource planners in completing accurate resource adequacy studies.
- **Solar Variability:** Solar output variability due to cloud coverage can be a minor concern year-round in this subregion. Entities in this subregion state there are sufficient flexible resources in their portfolio to address solar output uncertainty.
- **Wind Variability:** Wind variability is of particular concern for this subregion during the winter. Cold weather mixed with moisture can cause icing conditions on wind turbine blades, which can severely derate a wind site. Entities in this subregion state that there are sufficient flexible resources in their portfolio to address wind output uncertainty in the winter.
- **Electric-Gas Coordination:** The Northwest subregion contains entities that consider electric-gas coordination in long-term planning studies, as well as entities that do not. Several gas supply options for future generating assets are evaluated to ensure alternatives exist if one supply point is curtailed. Price certainty from suppliers is also a major consideration in

planning studies. Annual natural-gas-load studies are conducted to help identify parts of the gas distribution system that may experience low pressure during peak cold conditions. These areas of the gas system are identified, and recommendations to address this issue are prioritized and completed. If an issue cannot be addressed within a short period of time, contingency plans are developed for these areas during high gas demand or peak cold conditions. Entities in the Northwest subregion are participants in the NWMMA mentioned earlier in the Basin subregion. Status reports and planned resource output forecasts are communicated between electric and gas teams daily to ensure operational needs are met.

- **Renewable Portfolio, Clean Electricity, and Emissions Standards:** Washington is required to have zero coal generation by 2025, be greenhouse gas neutral by 2030 (can use offsets), and be 100% non-emitting by 2045 without using offsets. Oregon passed a requirement for its investor-owned utilities to be 80% below their 2005 emissions baseline by 2030, 90% below by 2035, and 100% below (zero emissions) by 2040. Montana has a 15% renewables target that has been met, with no incremental increases in the out-years.

Transmission: PacifiCorp’s [Blueprint transmission project](#) will connect major resource and load areas in central and eastern Oregon through construction of approximately 320 miles of new 500 kV transmission line and associated 500 kV and 230 kV system upgrades, in three primary segments planned to be fully in-service in 2028 and 2032. The Blueprint project will largely parallel the existing Northwest AC Intertie 500 kV system, interconnecting at various points and requiring significant coordination with ac Intertie owners and other affected systems. Affected paths include WECC Paths 14, 66 and 75.

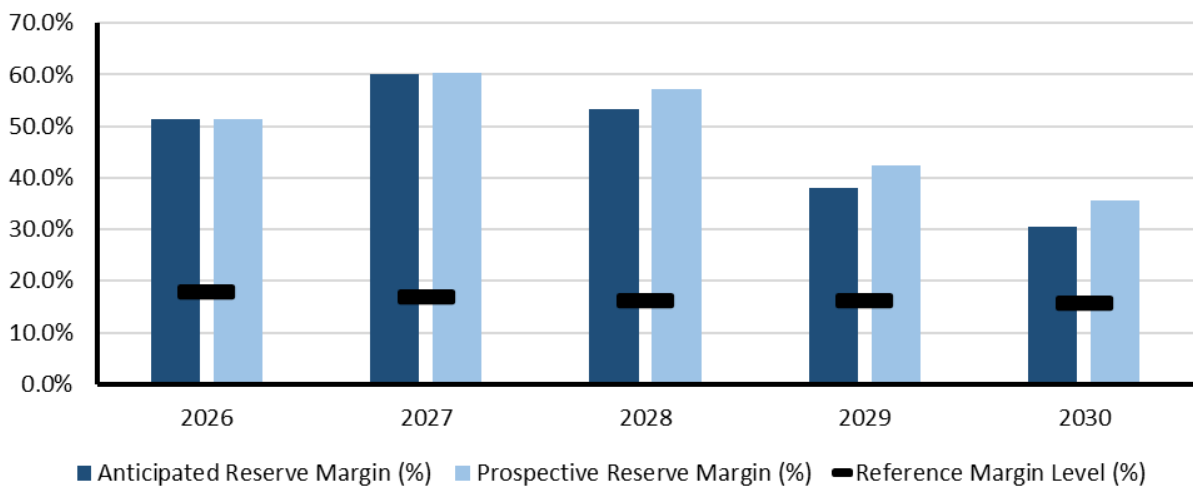


WECC-Rocky Mountain

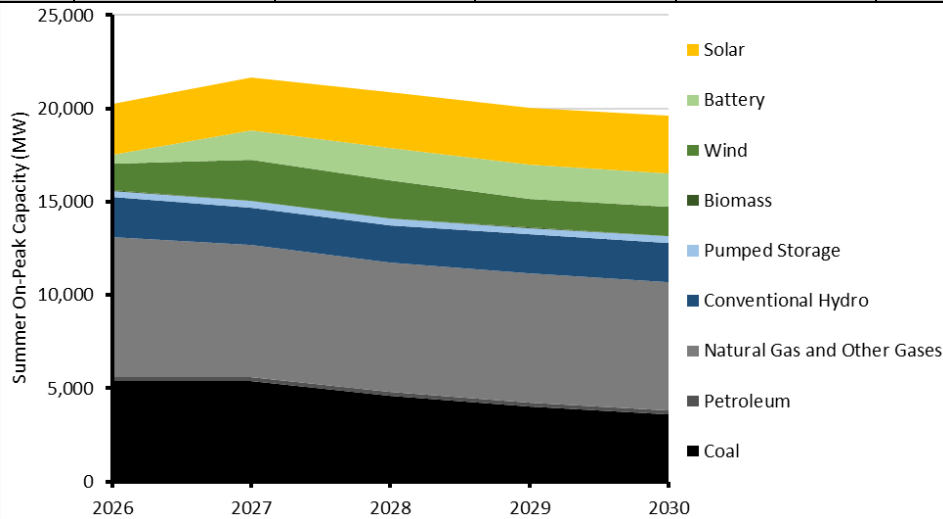
WECC-Rocky Mountain is a summer-peaking assessment area in the Western Interconnection that includes Colorado, most of Wyoming, and parts of Nebraska and South Dakota. The population of the area is approximately 6.7 million. It covers the balancing areas of the Public Service Company of Colorado and the Western Area Power Administration’s Rocky Mountain Region. It has 18,797 miles of transmission. WECC is responsible for coordinating and promoting BES reliability in the Western Interconnection. WECC’s 329 members include 40 BAs, representing a wide spectrum of organizations with an interest in the BES. Serving an area of nearly 1.8 million square miles and more than 84.5 million customers, it is geographically the largest and most diverse Regional Entity. *Note: The 2025 LTRA includes a new assessment area map for the U.S. Western Interconnection. The new assessment area boundaries provide more geographic detail of reliability risk information. WECC-Rocky Mountain is a new assessment area in 2025 that was part of WECC-NW in the 2024 LTRA.*

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	14,004	14,338	14,565	15,021	15,442	15,873	16,306	16,764	17,207	17,297
Demand Response	287	290	293	285	287	290	293	296	298	301
Net Internal Demand	13,717	14,048	14,272	14,736	15,154	15,583	16,013	16,468	16,909	16,997
Additions: Tier 1	1,771	3,486	3,979	4,079	4,079	4,079	4,355	4,299	4,079	4,079
Additions: Tier 2	0	45	585	640	761	761	810	810	761	761
Additions: Tier 3	17	178	925	1,160	1,373	3,207	3,276	4,188	4,274	4,370
Net Capacity Transfers (WECC Model)	391	661	852	179	50	23	0	0	0	0
Existing-Certain and Net Transfers	18,979	18,995	17,884	16,278	15,696	14,882	14,721	14,329	14,143	14,098
Anticipated Reserve Margin (%)	51.3%	60.0%	53.2%	38.1%	30.5%	21.7%	19.1%	13.1%	7.8%	6.9%
Prospective Reserve Margin (%)	51.3%	60.3%	57.3%	42.5%	35.5%	26.6%	24.2%	18.0%	12.3%	11.4%
Reference Margin Level (%)	17.8%	17.0%	16.2%	16.1%	15.7%	15.2%	13.5%	11.9%	14.1%	13.9%



Planning Reserve Margins



Existing and Tier 1 Resources

WECC-Rocky Mountain Highlights

- ARM remains above the RML through 2033. Furthermore, ProbA results indicate that planned resources can reliably meet demand during the studied years of 2027 and 2029.
- The ARM and PRM fall below the RML in Summer 2034 and 2035 and Winter 2034–35, indicating that not enough resources have progressed into the interconnection queue for these later years in the assessment period.

WECC-Rocky Mountain Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	5,383	5,376	4,623	4,034	3,585
Coal*	5,053	5,376	4,429	3,379	2,180
Petroleum	204	204	204	204	204
Natural Gas	7,522	7,083	6,897	6,902	6,902
Biomass	6	6	6	3	3
Solar	2,695	2,873	3,002	3,071	3,071
Wind	1,437	2,218	2,054	1,555	1,550
Conventional Hydro	2,139	2,043	2,029	2,116	2,116
Pumped Storage	346	340	340	346	346
Other	126	126	126	126	126
Battery	496	1,547	1,726	1,817	1,817
Unknown	6	5	5	6	6
Total MW	20,359	21,820	21,011	20,178	19,725
Total MW*	20,029	21,820	20,817	19,523	18,320
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to be included in system plans are removed from the resource projection where marked.					

WECC-Rocky Mountain

Planning Reserve Margins

The ARM and PRM fall below the RML in Summer 2034 and 2035 and Winter 2034–35, indicating that not enough resources have progressed into the interconnection queue for these later years in the assessment period. In Winter 2033–34, the ARM falls below the RML, but the prospective resources are expected to sufficiently cover a shortfall. No BAs in this region are WRAP participants.

The Public Service Company of Colorado (PSCo), a subsidiary of Xcel Energy, has used a 16.3% long-term PRM requirement in its Electric Resource Plan (2021), based on a loss of load probability of 1-day every 10 years. PSCo’s reserve margin is not used in WECC’s methodology for the LTRA.

Non-Peak Hour Risk, Energy Assurance, Probabilistic-Based Assessments

WECC performs a probabilistic resource adequacy analysis using the MAVRIC model. MAVRIC is WECC’s internally developed modeling tool that performs energy based probabilistic assessments that support NERC’s LTRA and seasonal assessments, as well as WECC’s WARA.

ProbA Results

The ProbA found that planned resources meet demand and reliability margins for all hours (no EUE or LOLH).

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	N/A	0	0
NEUE (ppm)	N/A	0.00	0.00
LOLH (hours per Year)	N/A	0.00	0.00
*No prior results as the assessment area is new for the 2025 LTRA.			

Since WECC-Rocky Mountain does not show any LOLH or EUE in 2027 or 2029, no additional reporting of results or visualizations are provided.

Demand

Average annual demand growth rate for WECC-Rocky Mountain is 2.5%. The primary drivers are data centers, commercial customer growth, and industrial customer growth. Large-load additions in the forecast are 574 MW through 2035.

Demand-Side Management

PSCo offers a wide array of DR programs. Total summer demand-reduction estimates for controllable programs for can be found in its [Demand Side Management & Beneficial Electrification Plan](#).

Distributed Energy Resources

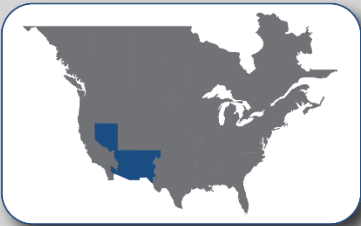
BAs did not report a forecast for BTM resources. Some information is available through the EIA on both historical and forecast data. BTM DER impacts are reflected in the demand data (net of the DERs).

Generation

Operational and planning issues related to generation in WECC-Rocky Mountain include the following:

- Unplanned Outage Extensions:** Supply chain issues, unplanned discovery work, and vendor availability have driven unplanned extensions of resource outages in the Rocky Mountain area. Difficulty in boiler feed pump procurement has resulted in at least one generating asset being unavailable for over nine months. Another thermal site was undergoing a rotor swap and piping inspection, which revealed significant weld defects and pipe cracks. This resulted in a two-month outage being extended into the following year. A hydro site has been unavailable for much of 2024 due to a penstock leak which has been unable to be repaired due to vendor unavailability. Alternative vendors are being sought after for hydro repair work, and contracts to expedite the procurement of equipment will be in place going forward to mitigate these issues.
- Solar and Wind Variability:** Smaller entities in the Rocky Mountain area have stated that wind and solar variability is a concern year-round due to a lack of geographic diversity. These entities are pursuing advancement into RTOs to leverage the advantages of a wider footprint and additional resources.
- Electric-Gas Coordination:** The Rocky Mountain area contains entities that consider electric-gas coordination in long-term planning studies as well as entities that do not. For entities that do consider electric-gas coordination, peak capacity requirements for the local distribution company (LDC) and generating assets are inputs into long term planning models. Peak capacity requirements define the pipeline capacity and contractual volumes needed to fulfill LDC and electric needs. In addition, known and historical constraints on pipelines are considered in resource planning studies. Gas suppliers in this subregion have multiple delivery points to resources. This allows for an alternative location for delivery if one delivery point is inaccessible. In addition, gas supply teams provide an email with natural gas price information and constraints to generation dispatchers and marketers daily. During times of cold weather, this communication stream can be expanded to include interstate gas control and commercial operations.

- **Renewable Portfolio, Clean Electricity, and Emissions Standards:** Colorado requires investor-owned utilities to adopt plans to reduce greenhouse gas emissions by at least 80% by 2030, using a 2005 baseline. While the state is on track to achieve this, the additional goal of being 100% carbon free by 2040 is being discussed by utilities, regulators, and legislators, with a proposal to extend the out-year to 2050 in light of the upward pressure on the cost of renewables caused by potential repeal of tax credits and higher tariffs on imports.

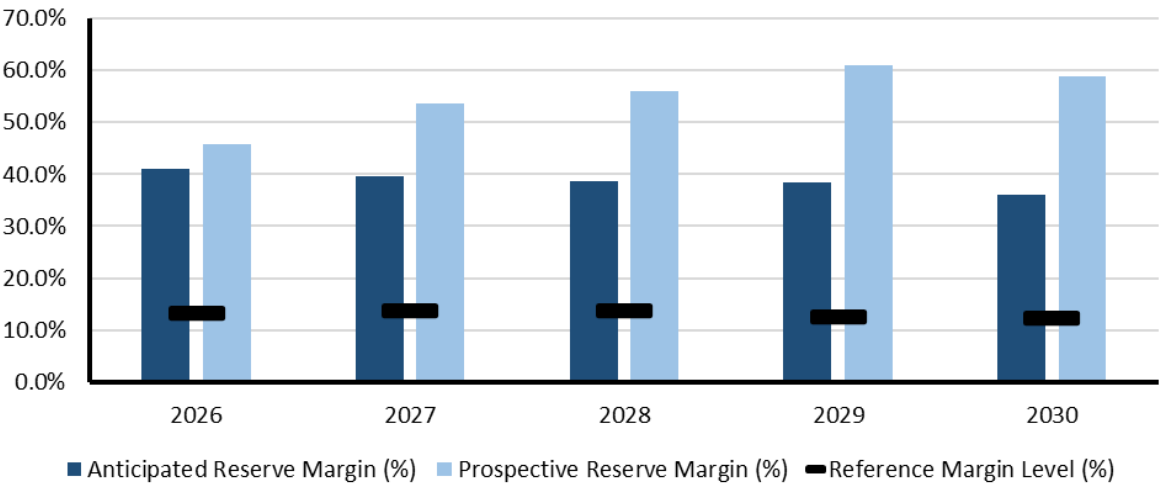


WECC-Southwest

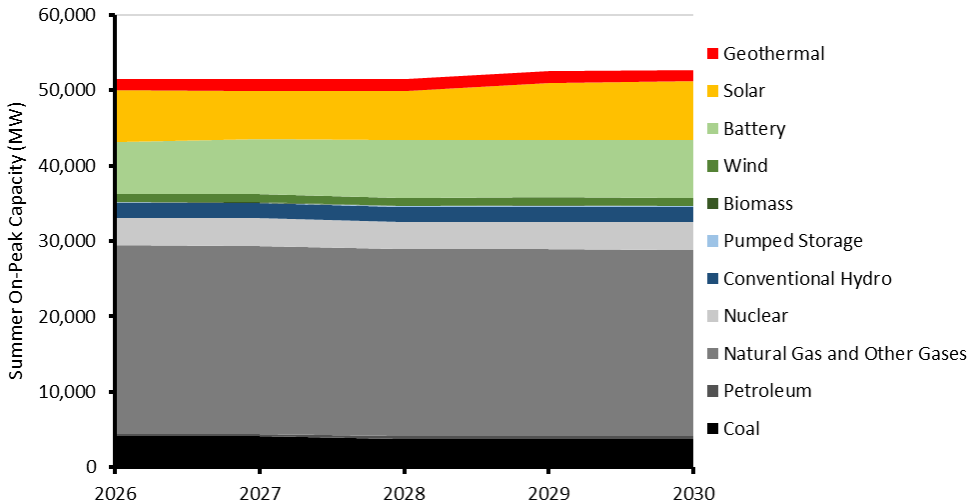
WECC-Southwest is a summer-peaking assessment area in the Western Interconnection that includes all of Arizona and New Mexico, most of Nevada, and small parts of California and Texas. The area has a population of approximately 13.6 million. It has 23,084 miles of transmission. WECC is responsible for coordinating and promoting BES reliability in the Western Interconnection. WECC’s 329 members include 40 BAs, representing a wide spectrum of organizations with an interest in the BES. Serving an area of nearly 1.8 million square miles and more than 84.5 million customers, it is geographically the largest and most diverse Regional Entity. *Note: The 2025 LTRA includes a new assessment area map for the U.S. Western Interconnection. The new assessment area boundaries provide more geographic detail of reliability information. WECC-Southwest is a new, larger assessment area in 2025 that now includes a portion of WECC-NW in the 2024 LTRA.*

Demand, Resources, and Reserve Margins

Quantity	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Total Internal Demand	37,407	38,911	40,429	41,887	43,551	44,772	45,664	46,317	47,226	47,988
Demand Response	237	258	264	272	282	237	258	264	272	282
Net Internal Demand	37,169	38,653	40,165	41,615	43,269	44,535	45,405	46,053	46,953	47,706
Additions: Tier 1	6,639	7,501	8,155	8,562	8,914	8,914	8,914	8,396	8,852	8,852
Additions: Tier 2	1,771	5,410	6,994	9,369	9,872	11,263	11,286	10,468	11,286	11,252
Additions: Tier 3	2,502	3,899	5,242	7,562	9,710	12,409	14,804	14,801	24,521	24,571
Net Capacity Transfers (WECC Model)	902	2,544	4,162	5,101	6,301	5,895	5,570	4,880	5,030	4,715
Existing-Certain and Net Transfers	45,794	46,457	47,523	49,023	49,986	49,308	47,432	44,294	44,948	43,944
Anticipated Reserve Margin (%)	41.1%	39.6%	38.6%	38.4%	36.1%	30.7%	24.1%	14.4%	14.6%	10.7%
Prospective Reserve Margin (%)	45.8%	53.6%	56.0%	60.9%	58.9%	56.0%	49.0%	37.1%	38.6%	34.3%
Reference Margin Level (%)	13.3%	13.7%	13.6%	12.6%	12.2%	12.0%	11.7%	12.3%	11.3%	11.1%



Planning Reserve Margins



Existing and Tier 1 Resources

WECC-Southwest Highlights

- ARM remains above the RML through 2034. Furthermore, ProbA results indicate that planned resources can reliably meet demand during the studied years of 2027 and 2029.
- The ARM falls below the RML in Summer 2034. With the addition of Prospective Resources, the area can remain above RML.

WECC-Southwest Projected Generating Capacity by Energy Source in Megawatts (MW)					
	2026	2027	2028	2029	2030
Coal	4,121	4,116	3,749	3,754	3,754
Coal*	3,761	4,116	3,749	3,754	2,576
Petroleum	341	340	340	336	336
Natural Gas	24,978	24,887	24,817	24,837	24,750
Biomass	46	46	46	46	46
Solar	6,867	6,349	6,503	7,474	7,804
Wind	1,059	1,055	1,055	1,059	1,050
Geothermal	1,555	1,555	1,607	1,572	1,454
Conventional Hydro	1,984	1,989	1,989	1,982	1,981
Pumped Storage	113	113	113	113	113
Nuclear	3,641	3,640	3,640	3,641	3,641
Battery	6,824	7,325	7,657	7,671	7,671
Total MW	51,530	51,414	51,516	52,484	52,598
Total MW*	51,170	51,414	51,516	52,484	51,421
*Capacity with additional generator retirements. Generators that have announced plans to retire but have yet to be included in system plans are removed from the resource projection where marked.					

WECC-Southwest

Planning Reserve Margins

The ARM falls below the RML in Summer 2034 but is covered by the PRM. Arizona Public Service and Public Service Company of New Mexico (PNM) are participants in the WRAP.

Energy Assessment, Including Non-Peak Hour Risk

WECC performs a probabilistic resource adequacy analysis using the MAVRIC model. MAVRIC is WECC’s internally developed modeling tool that performs energy based probabilistic assessments that support NERC’s LTRA and seasonal assessments, as well as WECC’s WARA.

ProbA Results

The ProbA found that planned resources meet demand and reliability margins for all hours (no EUE or LOLH).

Base-Case Summary of Results			
	2026*	2027	2029
EUE (MWh)	N/A	0	0
NEUE (ppm)	N/A	0.00	0.00
LOLH (hours per Year)	N/A	0.00	0.00
* No prior results as the assessment area is new for the 2025 LTRA.			

WECC-Southwest does not show any LOLH or EUE in 2027 or 2029; therefore, no additional visualizations are provided.

Demand

The average annual demand growth rate for WECC-Southwest is 3.9%. The primary drivers are data centers, industrial electrification, residential electrification, and residential customer growth. Large-load additions in the forecast are 9,422 MW through 2035.

Demand-Side Management

In the Southwest, Arizona Public Service is in the process of implementing numerous DSM pilots and programs such as the Residential Energy Storage Pilot and Commercial Advanced Rooftop Controls. The Residential Energy Storage Pilot enables the company to dispatch a small battery energy storage system up to 20% of the system’s capacity.

Salt River Project (SRP) continues to leverage approximately 87 MW of DR capability through more than 75,000 residential smart thermostats, and 41 MW from over 500 businesses enrolled as interruptible customers. SRP intends to achieve 300 MW of dispatchable DR capability by 2035.

PNM programs reduce peak demand by an average of 45 MW per summer event from its two primary programs enrolling the ability to call on commercial customers and residential air conditioners up to 100 hours with a four-hour limit per curtailment.

Distributed Energy Resources

BAs did not report a forecast for BTM resources. Some information is available through the EIA on both historical and forecast data. BTM DER impacts are reflected in the demand data (net of the DER).

Generation

Operational and planning issues related to generation in WECC-Southwest include the following:

- **Aging Thermal Resource Fleet:** A year-round concern for this subregion is an aging thermal resource fleet. Hundreds of MW of capacity in this region have been operational for over 60 years. During the winter, certain thermal resources are unable to cycle below 40°F due to freezing issues. Older sites also require extensive overhauls such as generator rewinds that can keep resources out of service for extended periods of time and potentially longer than planned as discovery work manifests into additional maintenance. To reduce the risk of age-related forced outages, plant staff adhere to a strict maintenance schedule with frequent inspections, and unit performance is routinely monitored.
- **Behind-the-Meter Variability:** BTM output variability can be an operational concern for this subregion year-round as BTM solar can supply a large amount of energy to the system. Unanticipated loss of BTM generation is addressed through activation of DR programs, peaking power plants, and maintaining sufficient BESS charge. Near-term forecasts for BTM output are also made available to system operators so they can pre-emptively dispatch the system as needed.
- **Coal Inventory Shortages:** In-progress fuel conversions of coal to gas create a balancing act of maintaining coal on-site to operate resources while also avoiding excess coal post conversion. This can limit coal resources to minimum output prior to the fuel conversion outage. In addition, site-specific challenges at coal mines have delayed coal deliveries to resources in this subregion. Active management of on-site inventory and procurement of fuel from other sources can mitigate these issues.

- **Gas Fleet Derates:** Gas resources in this subregion can be derated during hot weather in the summer due to ambient conditions. During the winter, gas supply has been cut to plants in this subregion during cold snaps. Near-term monitoring of gas availability along with additional market purchases or fuel switching for capable resources can assist in mitigating supply issues.
- **Solar Variability:** Solar output variability is a concern year-round for this subregion. It is a primary concern on summer evenings as solar output rapidly declines whereas load increases or remains elevated. Activation of DR programs, peaking/flexible power plants, and maintaining sufficient BESS charge are all potential strategies to mitigate this issue. Large changes in solar output can also cause extreme ACE fluctuations, which are addressed using BESS.
- **Electric-Gas Coordination:** Most entities in the area consider electric-gas coordination in long-term planning studies. Resource planning models compare forecasted gas usage on both daily and hourly intervals to firm contractual rights. Gas usage exceeding firm obligations results in unserved energy, which can then be addressed via spot market purchases, short-term gas transport capacity purchases, or the dispatching of other resources. Entities also account for forecasted LDC usage and reduce the available natural gas for electric use by this amount. Resource adequacy models do not yet incorporate gas pipeline constraints, but consideration is being given to how to incorporate these into modeling efforts.

Procedures to mitigate gas supply issues include anticipating losses of scheduled gas from the supply side, ensuring scheduled pipeline maintenance is accounted for in operations, and

maximizing the availability of dual fuel resources. Planning teams also coordinate with operations teams for gas supply issues on a season-ahead basis, and operations can re-dispatch the system as needed to manage fuel shortages. During times of potential freeze-offs, trading practices may also be changed to not overextended firm load requirements. Entities maintain winter and summer readiness plans that are shared between electric system operators and gas pipeline operators to ensure maintenance schedules are aligned. Gas system limitations are made known to electric system operators through routine meetings between system operators and pipeline operators.

- **Renewable Portfolio, Clean Electricity & Emissions Standards:** In the Southwest region, Arizona has an RPS mandate for its electric supply to be 15% renewable by 2025. Separately, [APS](#) has committed to ending the use of coal-fired generation after 2031, and the company set a 100% carbon free by 2050 goal. SRP has goals to reduce CO2 emissions per MWh by 62% from 2005 levels by 2035 and 90% by 2050; TEP will stop using coal by 2032 and plans to reduce carbon emissions by 80% by 2035. New Mexico has set more aggressive mandates, requiring 50% renewable by 2030, 80% by 2040, and 100% by 2045.

Demand Assumptions and Resource Categories

Demand (Load Forecast)	
Total Internal Demand	This is the peak hourly load ⁴⁹ for the summer and winter of each year. ⁵⁰ Projected total internal demand is based on normal weather (50/50 distribution) ⁵¹ and includes the impacts of distributed resources, EE, and conservation programs.
Net Internal Demand	This is the total internal demand reduced by the amount of controllable and dispatchable DR projected to be available during the peak hour. Net internal demand is used in all reserve margin calculations.

Load Forecasting Assumptions by Assessment Area			
Assessment Area	Peak Season	Coincident / Noncoincident ⁵²	Load Forecasting Entity
MISO	Summer	Coincident	MISO LSEs
MRO-Manitoba Hydro	Winter	Coincident	Manitoba Hydro
MRO-SaskPower	Winter	Coincident	SaskPower
MRO-SPP	Summer	Noncoincident	SPP LSEs
NPCC-Maritimes	Winter	Noncoincident	Maritimes sub-areas
NPCC-New England	Summer	Coincident	ISO-NE
NPCC-New York	Summer	Coincident	NYISO
NPCC-Ontario	Summer	Coincident	IESO
NPCC-Québec	Winter	Coincident	Hydro-Québec
PJM	Summer	Coincident	PJM
SERC-East	Summer	Noncoincident	SERC LSEs
SERC-Florida Peninsula	Summer	Noncoincident	
SERC-Central	Summer	Noncoincident	
SERC-Southeast	Summer	Noncoincident	
Texas RE-ERCOT	Summer	Coincident	ERCOT
WECC-Alberta	Winter	Noncoincident	WECC BAs, aggregated by WECC
WECC-Basin	Summer	Noncoincident	
WECC-British Columbia	Winter	Noncoincident	
WECC-California	Summer	Noncoincident	
WECC-Mexico	Summer	Noncoincident	

⁴⁹ [Glossary of Terms Used in NERC Reliability Standards](#).

⁵⁰ The summer season represents June–September and the winter season represents December–February. In this assessment, the year of a winter period is referred to by the year of the month of December (e.g., Winter 2025 is December 2025 – February 2026).

⁵¹ Essentially, this means that there is a 50% probability that actual peak demand will be higher and a 50% probability that actual peak demand will be lower than the value provided for a given season/year.

⁵² Coincident: This is the sum of two or more peak loads that occur in the same hour. Noncoincident: This is the sum of two or more peak loads on individual systems that do not occur in the same time interval. This is meaningful only when considering loads within a limited period of time, such as a day, a week, a month, a heating or cooling season, and usually for not more than one year.

Load Forecasting Assumptions by Assessment Area

Assessment Area	Peak Season	Coincident / Noncoincident ⁵²	Load Forecasting Entity
WECC-Northwest	Winter	Noncoincident	
WECC-Rocky Mountain	Summer	Noncoincident	
WECC-SW	Summer	Noncoincident	

Resource Categories

NERC collects projections for the amount of existing and planned capacity and net capacity transfers (between assessment areas) that will be available during the forecast hour of peak demand for the summer and winter seasons of each year. Resource planning methods vary throughout the North American BPS. NERC uses the following categories to provide a consistent approach for collecting and presenting resource adequacy.

Anticipated Resources⁵³

- Existing-certain generating capacity: includes capacity to serve load during period of peak demand from commercially operable generating units with firm transmission or other qualifying provisions specified in the market construct.
- Tier 1 capacity additions: includes capacity that is either under construction or has received approved planning requirements
- Firm capacity transfers (Imports minus Exports): transfers with firm contracts
- Less confirmed retirements⁵⁴

Prospective Resources: Includes all “anticipated resources” plus the following:

- Existing-other capacity: includes capacity to serve load during period of peak demand from commercially operable generating units without firm transmission or other qualifying provision specified in the market construct. Existing-other capacity could be unavailable during the peak for a number of reasons.
- Tier 2 capacity additions: includes capacity that has been requested but not received approval for planning requirements
- Expected (non-firm) capacity transfers (imports minus exports): transfers without firm contracts but a high probability of future implementation.
- Less unconfirmed retirements.⁵⁵

⁵³ Projected capacities are inputs to reserve margin calculations and probabilistic assessments. Projections are dependent on official retirement notices to system operators. If no notice is given, capacity projections assume no retirements, even if established trends for resource retirements show declines over past years

⁵⁴ Generators that have formally announced retirement plans. These units must have an approved generator deactivation request where applicable.

⁵⁵ Capacity that is expected to retire based on the result of an assessment area generator survey or analysis. This capacity is aggregated by fuel type.

Resource Categories

Generating Unit Status: Status at time of reporting:

- Existing: It is in commercial operation.
- Retired: It is permanently removed from commercial operation.
- Mothballed: It is currently inactive or on standby but capable for return to commercial operation. Units that meet this status must have a definite plan to return to service before changing the status to “Existing” with capacity contributions entered in “Expected-Other.” Once a “mothballed” unit is confirmed to be capable for commercial operation, capacity contributions should be entered in “Expected-Certain.”
- Cancelled: planned unit (previously reported as Tier 1, 2, or 3) that has been cancelled/removed from an interconnection queue.
- Tier 1: A unit that meets at least one of the following guidelines (with consideration for an area’s planning processes):⁵⁶
 - Construction complete (not in commercial operation)
 - Under construction
 - Signed/approved Interconnection Service Agreement (ISA)
 - Signed/approved Power Purchase Agreement (PPA) has been approved
 - Signed/approved Interconnection Construction Service Agreement (CSA)
 - Signed/approved Wholesale Market Participant Agreement (WMPA)
 - Included in an integrated resource plan or under a regulatory environment that mandates a resource adequacy requirement (Applies to Vertically Integrated Entities)
- Tier 2: A unit that meets at least one of the following guidelines (with consideration for an area’s planning processes):⁵⁷
 - Signed/approved Completion of a feasibility study
 - Signed/approved Completion of a system impact study
 - Signed/approved Completion of a facilities study
 - Requested Interconnection Service Agreement
 - Included in an integrated resource plan or under a regulatory environment that mandates a resource adequacy requirement (Applies to RTOs/ISOs)
- Tier 3: A units in an interconnection queue that do not meet the Tier 2 requirement.

⁵⁶ AESO: Project has completed Stage 4: the Alberta Utilities Commission (AUC) has issued a Permit and License (AESO-specific)

⁵⁷ AESO: Project has completed Stage 4: the Alberta Utilities Commission (AUC) has issued a Permit and License (AESO-specific)

Reserve Margin Descriptions
Planning Reserve Margins: The primary metric used to measure resource adequacy defined as the difference in resources (anticipated or prospective) and net internal demand divided by net internal demand, shown as a percentile
Anticipated Reserve Margin (ARM): The amount of anticipated resources less net internal demand calculated as a percentage of net internal demand
Prospective Reserve Margin (PRM): The amount of prospective resources less net internal demand calculated as a percentage of net internal demand
Reference Margin Level (RML): The assumptions and naming convention of this metric vary by assessment area. The RML can be determined using both deterministic and probabilistic (based on a 0.1/year loss-of-load study) approaches. In both cases, system planners use this metric is to quantify the amount of reserve capacity in the system above the forecasted peak demand that is needed to ensure sufficient supply to meet peak loads. Establishing an RML is necessary to account for long-term factors of uncertainty involved in system planning, such as unexpected generator outages and extreme weather impacts that could lead to increased demand beyond what was projected in the 50/50 load forecasted. In many assessment areas, an RML is established by a state, provincial authority, ISO/RTO, or other regulatory body. In some cases, the RML is a requirement. RMLs can fluctuate over the duration of this assessment period or may be different for the summer and winter seasons. If an RML is not provided by a given assessment area, NERC applies 15% for predominately thermal systems and 10% for predominately hydro systems.

Methods and Assumptions

How NERC Defines BPS Reliability

NERC defines the reliability of the interconnected BPS in terms of two basic and functional aspects:

- **Adequacy:** The ability of the electric system to supply the aggregate electric power and energy requirements of the electricity consumers at all times, taking into account scheduled and expected unscheduled outages of system components
- **Operating Reliability:** The ability of the electric system to withstand sudden disturbances, such as electric short circuits or unanticipated loss of system components

When extreme or otherwise unanticipated conditions result in a resource shortfall, system operators take controlling actions or implement procedures to maintain a continual balance between supply and demand within a balancing area (formerly control area); these actions include the following:

- Public appeals
- Interruptible demand that the end-use customer makes available to its LSEs via contract or agreement for curtailment⁵⁸
- Voltage reductions (sometimes referred to as “brownouts” because incandescent lights will dim as voltage is lowered, sometimes as much as 5%)
- Rotating blackouts (The term “rotating” is used because each set of distribution feeders is interrupted for a limited time, typically 20–30 minutes, and then those feeders are put back in service and another set is interrupted, rotating the outages among individual feeders.)

System disturbances affect operating reliability when they cause the unplanned and/or uncontrolled interruption of customer demand. When these interruptions are contained within a localized area, they are considered unplanned interruptions or disturbances. When interruptions spread over a wide area of the grid, they are referred to as “cascading blackouts,” the uncontrolled successive loss of system elements triggered by an incident at any location.

The BES is a defined subset of the BPS that includes all facilities necessary for the reliable operation and planning of the BPS.⁵⁹ NERC Reliability Standards are intended to establish requirements for BPS owners and operators so that the BES delivers an adequate level of reliability (ALR),⁶⁰ which is defined by the following characteristics.

- **Adequate Level of Reliability:** It is the state that the design, planning, and operation of the BES will achieve when the following reliability performance objectives are met:
 - The BES does not experience instability, uncontrolled separation, cascading,⁶¹ and/or voltage collapse under normal operating conditions or when subject to predefined disturbances.⁶²
 - BES frequency is maintained within defined parameters under normal operating conditions and when subject to predefined disturbances.
 - BES voltage is maintained within defined parameters under normal operating conditions and when subject to predefined disturbances.

⁵⁸ Interruptible demand (or interruptible load) is a term used in NERC Reliability Standards. See Glossary of Terms used in Reliability Standards: [NERC Glossary of Terms](#)

⁵⁹ [BES Definition](#)

⁶⁰ NERC Informational Filing (to FERC) on the Definition of Adequate Level of Reliability, Docket Number RR06-1, May 10, 2013.

⁶¹ NERC’s Glossary of Terms defines Cascading: “Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

⁶² NERC’s Glossary of Terms defines Disturbance: “1. An unplanned event that produces an abnormal system condition. 2. Any perturbation to the electric system. 3. The unexpected change in ACE that is caused by the sudden failure of generation or interruption of load.”

- Adverse reliability impacts on the BES following low-probability disturbances (e.g., multiple BES contingences, unplanned/uncontrolled equipment outages, cyber security events, malicious acts) are managed.

Restoration of the BES after major system disturbances that result in blackouts and widespread outages of BES elements is performed in a coordinated and controlled manner.

How NERC Evaluates Reserve Margins in Assessing Resource Adequacy

PRMs are calculated by finding the difference between the amount of projected on-peak capacity and the forecasted peak demand and then dividing this difference by the forecasted peak demand. Each assessment area has a peak season, summer or winter, for which its peak demand is higher. PRMs used throughout this LTRA are for each assessment area’s peak season listed in the load forecasting table of the [Demand Assumptions and Resource Categories](#).

NERC assesses resource adequacy by evaluating each assessment area’s PRMs relative to its RML—a “target” or requirement based on traditional capacity planning criteria. The projected resource capacity used in the evaluations is reduced by known operating limitations (e.g., fuel availability, transmission limitations, environmental limitations) and compared to the RML, which represents the desired level of risk based on a probability-based loss-of-load analysis. On-peak resource capacity reflects expected output at the hour of peak demand. Because the electrical output of VERs (e.g., wind and solar) depend on weather conditions, on-peak capacity contributions are less than nameplate capacity. Based on the five-year projected reserves compared to the established RMLs, NERC determines the risk associated with the projected level of reserve and concludes in terms of the following:

- **Adequate:** The ARM is greater than RML.
- **Marginal:** The ARM is lower than the RML and the PRM is higher than RML.
- **Inadequate:** The ARM and PRMs are less than the RML and Tier 3 resources are unlikely to advance.

Metrics for Probabilistic Evaluation Used in this Assessment

Probabilistic Assessment: Biennially, NERC conducts a probabilistic evaluation as part of its resource adequacy assessment and publishes results in the LTRA.

Loss-of-Load Hours: LOLH is generally defined as the expected number of hours per time period (often one year) when a system’s hourly demand is projected to exceed the generating capacity. This metric is calculated by using each hourly load in the given period (or the load duration curve).

LOLH is evaluated using all hours rather than just peak periods. It can be evaluated over seasonal, monthly, or weekly study periods. LOLH does not inform of the magnitude or the frequency of loss-of-load events, but it is used as a measure of their combined duration. LOLH is applicable to both small and large systems and is relevant for assessments covering all hours (compared to only the peak demand hour of each season). LOLH provides insight to the impact of energy limited resources on a system’s reliability, particularly in systems with growing penetration of such resources. Examples of such energy limited resources include the following:

- DR programs that can be modeled as resources with specific contract limits, including hours per year, days per week, and hours per day constraints
- EE programs that can be modeled as reductions to load with an hourly load shape impact
- Distributed resources (e.g., BTM solar PV) that can be modeled as reductions to load with an hourly load shape impact
- VERs can be modeled probabilistically with multiple hourly profiles

Expected Unserved Energy: EUE is the summation of the expected number of megawatt hours of demand that will not be served in a given time period as a result of demand exceeding the available capacity across all hours. EUE is an energy-centric metric that considers the magnitude and duration for all hours of the time period and is calculated in MWhs. This measure can be normalized based on various components of an assessment area (e.g., total of peak demand, net energy for load). Normalizing the EUE provides a measure relative to the size of a given assessment area (generally in terms of parts per million or ppm).

EUE is the only metric that considers magnitude of loss-of-load events. With the changing generation mix, to make EUE a more effective metric, hourly EUE for each month provides insights on potential adequacy risk during shoulder and nonpeak hours. EUE is useful for estimating the size of loss-of-load events so the planners can estimate the cost and impact. EUE can be used as a basis for reference reserve margin to determine capacity credits for VERs. In addition, EUE can be used to quantify the impacts of extreme weather, common mode failure, etc.

NERC is not aware of any planning criteria in North America based on EUE; however, in Australia, the Australian Energy Market Operator is responsible for planning using 0.002% (20 ppm) EUE as their energy adequacy requirement.⁶³ This requirement incorporates economic factors based on the risk of load shedding and the value of load loss along with the load-loss reliability component.

On the basis of the two years of the ProbA results, NERC determines the risk in terms of the following:

- **Normal Risk:** Negligible amounts of LOLH and EUE.
- **Periods of Risk:** LOLH < 2 Hours and EUE < 0.002% of total annual net energy.
- **Significant Risk:** LOLH > 2 Hours and EUE > 0.002% of total annual net energy.

Understanding Demand Forecasts

Future electricity requirements cannot be predicted precisely. Peak demand and annual energy use are reflections of the ways in which customers use electricity in their domestic, commercial, and industrial activities. Therefore, the electric industry continues to monitor electricity use and generally revise its forecasts on an annual basis or as its resource planning requires. In recent years, the difference between forecast and actual peak demands have decreased, reflecting a trend toward improving forecasting accuracy.

The peak demand and annual net energy for load projections are aggregates of the forecasts of the individual planning entities and LSEs. These resulting forecasts reported in this LTRA are typically “equal probability” forecasts. That is, there is a 50% chance that the forecast will be exceeded and a 50% chance that the forecast will not be reached.

Forecast peak demands, or total internal demand, are electricity demands that have already been reduced to reflect the effects of DSM programs, such as conservation, EE, and time-of-use rates; it is equal to the sum of metered (net) power outputs of all generators within a system and the metered line flows into the system less the metered line flows out of the system. Thus, total internal demand is the maximum (hourly integrated) demand of all customer demands plus losses. The effects of DR resources that are dispatchable and controllable by the system operator, such as utility-controlled water heaters and contractually interruptible customers, are not included in total internal demand. Rather, the effects of dispatchable and controllable DR are included in net internal demand.

Future Transmission Project Categories

- **Under Construction:** Construction of the line has begun.
 - Planned (any of the following):
 - Permits have been approved to proceed

⁶³ https://wa.aemo.com.au/-/media/Files/Electricity/NEM/Planning_and_Forecasting/NEM_ESOO/2018/2018-Electricity-Statement-of-Opportunities.pdf

- Design is complete
- Needed in order to meet a regulatory requirement
- **Conceptual** (any of the following):
 - A line projected in the transmission plan
 - A line that is required to meet a NERC TPL standard or power-flow model and cannot be categorized as “Under Construction” or “Planned”
 - Other projected lines that do not meet requirements of “Under Construction” or “Planned”

Summary of Planning Reserve Margins and Reference Margin Levels by Assessment Area

Reference Margin Levels for Each Assessment Area (2026–2030)					
Assessment Area	Reference Margin Level	Assessment Area Terminology	Requirement?	Methodology	Reviewing or Approving Body
MISO	<u>2025-2026</u> Summer: 8.1% Fall: 14.9% Winter: 19.1% Spring (2027): 26.2%	Planning Reserve Margin	Yes: Established Annually ⁶⁴	0.1 day/Year Loss of Load Expectation (LOLE)	MISO
MRO-Manitoba Hydro	12.0%	Reference Margin Level	No	0.1 day/Year LOLE	Reviewed by the Manitoba Public Utilities Board
MRO-SaskPower	15.0%	Reference Margin Level	No	EUE and Deterministic Criteria	SaskPower
MRO-SPP	19.0%	Resource Adequacy Requirement	Yes: studied on Biennial Basis	0.1 day/Year LOLE	SPP Staff, Stakeholders, SPP Regional State Committee.
NPCC-Maritimes	20.0% ⁶⁵	Reference Margin Level	No	0.1 day/Year LOLE	Maritimes Sub-areas; NPCC
NPCC-New England	13.0–13.4%	Installed Capacity Requirement	Yes: three year requirement established annually	0.1 day/Year LOLE	ISO-NE, NPCC Criteria
NPCC-New York	15.0% ⁶⁶	Installed Reserve Margin	Yes: one year requirement, established annually by NYSRC based on full installed capacity values of resources	0.1 day/Year LOLE	NYSRC, NPCC Criteria
NPCC-Ontario	15.8–22.6%	Reserve Margin Requirement	Yes: established annually for all years	0.1 day/Year LOLE	IESO, NPCC Criteria
NPCC-Québec	11.9–12.2%	Reference Margin Level	No: established Annually	0.1 day/Year LOLE	Hydro-Québec, NPCC Reliability Coordinating Committee
PJM	18.6–26.3%	Installed Reserve Margin	Yes: established Annually for each of three future years	0.1 day/Year LOLE	PJM Board of Managers, ReliabilityFirst BAL-502-RFC-02 Standard
SERC-Central	15.0% ⁶⁷	Reference Margin Level	No: NERC-Applied 15%	SERC Performs 0.1 day/Year LOLE	Reviewed by Member Utilities

⁶⁴ In MISO, the states can override the MISO PRM.

⁶⁵ The 20% RML is used by the individual jurisdictions in the Maritimes area with the exception of Prince Edward Island, which uses a margin of 15%. Accordingly, 20% is applied for the entire area.

⁶⁶ The NERC LTRA RML for NY is 15%; however, there is no PRM criteria in New York. Wind, grid-connected solar, and run-of-river totals were derated for this calculation. Additionally, the NYISO uses probabilistic assessments to evaluate its system’s resource adequacy against the LOLE resource adequacy criterion of 0.1 days/year. However, New York requires LSEs to procure capacity for their loads equal to their peak demand plus an IRM. The IRM requirement represents a percentage of capacity above peak load forecast and is approved annually by the New York State Reliability Council (NYSRC). NYSRC approved the 2025/2026 IRM at 24.4%. All values in the IRM calculation are based upon full installed capacity (ICAP) MW values of resources, and it is identified based on annual probabilistic assessments and models for the upcoming capability year.

⁶⁷ SERC does not provide RMLs or resource requirements for its sub-areas. However, SERC members perform individual assessments to comply with any state requirements.

Reference Margin Levels for Each Assessment Area (2026–2030)					
Assessment Area	Reference Margin Level	Assessment Area Terminology	Requirement?	Methodology	Reviewing or Approving Body
SERC-East	15.0% ⁶⁸	Reference Margin Level	No: NERC-Applied 15%	SERC Performs 0.1 day/Year LOLE	Reviewed by Member Utilities
SERC-Florida Peninsula	15.0% ⁶⁹	Reliability Criterion	No: Guideline	0.1 day/Year LOLP	Florida Public Service Commission
SERC-Southeast	15.0% ⁷⁰	Reference Margin Level	No: NERC-Applied 15%	SERC Performs 0.1 day/Year LOLE	Reviewed by Member Utilities
Texas RE-ERCOT	13.75%	Target Reserve Margin	No	0.1 day/Year LOLE plus adjustent for non-modeled market considerations	ERCOT Board of Directors
WECC-Alberta	11.6–17.6%	Reference Margin Level	No: Guideline	Based on a conservative .02% threshold	WECC ⁷¹
WECC-Basin	12.3–14.0%	Reference Margin Level	No: Guideline	Based on a conservative .02% threshold	WECC ⁵⁸
WECC-British Columbia	11.6–12.1%	Reference Margin Level	No: Guideline	Based on a conservative .02% threshold	WECC ⁵⁸
WECC-California ⁷²	19.2–20.3%	Reference Margin Level	No: Guideline	Based on a conservative .02% threshold	WECC ⁵⁸
WECC-Mexico	7.0–9.1%	Reference Margin Level	No: Guideline	Based on a conservative .02% threshold	WECC ⁵⁸
WECC-Northwest	15.5–17.8%	Reference Margin Level	No: Guideline	Based on a conservative .02% threshold	WECC ⁵⁸
WECC-Rocky Mountain	15.7–17.8%	Reference Margin Level	No: Guideline	Based on a conservative .02% threshold	WECC ⁵⁸
WECC-Southwest	12.2–13.7%	Reference Margin Level	No: Guideline	Based on a conservative .02% threshold	WECC ⁵⁸

⁶⁸ SERC does not provide RMLs or resource requirements for its sub-areas. However, SERC members perform individual assessments to comply with any state requirements.

⁶⁹ SERC-FP uses a 15% reference reserve margin as approved by the Florida Public Service Commission for non-IOUs and recognized as a voluntary 20% reserve margin criteria for IOUs; individual utilities may also use additional reliability criteria.

⁷⁰ SERC does not provide RMLs or resource requirements for its sub-areas. However, SERC members perform individual assessments to comply with any state requirements.

⁷¹ WECC’s RML in this table is for the hour of peak demand. Some hours in the year require a higher reserve margin to meet the 0.02% reliability criteria due to the variability in resource availability and resource performance characteristics.

⁷² California is the only state in the Western Interconnection that has a wide-area RML, currently 17.5%: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/resource-adequacy-homepage>.

Recommendations and ERO Actions Summary

In addition to the recommendations in the Executive Summary, NERC recommends continued progress in areas identified previously in NERC’s LTRA and other assessment reports. The ERO, industry, vendors/manufacturers, and stakeholders should continue acting on the following recommendations to inform system and operations planning, develop the transmission network, and address resource performance issues attributed to IBR characteristics, cold weather, and fuel supply limitations. The ERO has a range of activities underway to monitor, assess, and reduce long-term BPS reliability risks. The selected ERO activities summarized below will result in new or enhanced Reliability Standards requirements, reliability guidelines, resources, or significant findings and actionable steps for stakeholders to address reliability risks.

LTRA Recommendations and Ongoing ERO Actions

Add new resources with needed reliability attributes and make existing resources more dependable.

- 1. Use enhanced resource adequacy and energy risk assessments for determining resource needs:** PRMs are not sufficient for measuring resource adequacy for most areas because VERs and generator fuel supply issues expose additional energy risks. Resource Planners and wholesale markets need to use enhanced modeling that accounts for energy risks, such as all-hours probabilistic assessments. Multi-metric criteria applied to results from probabilistic studies that include load loss, unserved energy, event magnitude, and event duration will support achieving the levels of reliability that are required for modern society.
- 2. Address performance deficiencies with existing and future inverter-based resources:** Reliably integrating IBRs onto the grid is paramount, and evidence indicates that the risk of grid vulnerabilities from interconnection practices and IBR performance issues are growing. IBRs include most solar and wind generation as well as new BESS or hybrid generation and account for 85% of the new generation in development for connecting to the BPS. IBRs respond to disturbances and dynamic conditions based on programmed logic and inverter controls. The tripping of BPS-connected solar PV generating units and other control system behavior during grid faults has caused sudden loss of generation resources (over wide areas in some cases). Industry experience with unexpected tripping of BPS-connected solar PV generation units can be traced back to the 2016 Blue Cut fire in California, and similar events have occurred in new geographic areas as recently as the summer of 2023.⁷³ A common thread with these events is the lack of IBR ride-through capability that causes a minor system disturbance to become a major disturbance. Based on the findings of a recent NERC alert, more ride-through and ERS capabilities can be enabled within existing solar PV resources to improve performance and support the reliable operation of the BPS.⁷⁴ Industry adoption of the recommended practices set forth in NERC reliability guidelines and the NERC alert will reduce risks from IBR performance issues to the grid as NERC also develops mandatory Reliability Standards based on those reliability guidelines. It is also critically important for interconnection processes to include accurate modeling and studies requirements.⁷⁵ Guided by NERC’s comprehensive Inverter-Based Resources Strategy and in response to FERC Order No. 901, the ERO, industry, and manufacturers should take additional steps to ensure that IBRs operate reliably and that the system is planned with due consideration for their characteristics.^{76,77}
- 3. Improve the performance of the generating fleet in extreme cold temperatures:** The ERO and industry need to complete enhanced requirements for generator cold weather performance to address reliability related findings from the FERC, NERC, and Regional Entity joint staff inquiry into the February 2021 cold weather grid outages.⁷⁸ Revisions to Reliability Standard EOP-012-2 will improve the effectiveness of the standard and speed the implementation of corrective actions necessary to address unacceptable freezing issues. Findings of the inquiry into Winter Storm Elliott (December 2022) reinforce the urgency of this effort.⁷⁹

⁷³ See the ERO’s extensive IBR event reporting here: [NERC Major Event Reports](#)

⁷⁴ The NERC Level 2 alert to gather data from solar PV resource owners and issue recommendations can be found here: [Industry Recommendation: Inverter-Based Resource Performance Issues](#).

⁷⁵ NERC’s comprehensive initiatives to reduce IBR risks are detailed here: [IBR Quick Reference Guide](#)

⁷⁶ [NERC IBR Activities](#)

⁷⁷ [Order No. 901 Work Plan](#)

⁷⁸ [The February 2021 Cold Weather Outages in Texas and the South Central United States | FERC, NERC and Regional Entity Staff Report](#)

⁷⁹ [Inquiry into Bulk-Power System Operations During December 2022 Winter Storm Elliott](#)

LTRA Recommendations and Ongoing ERO Actions

4. Mitigate fuel-related risks to electricity generation (fuel assurance): In addition to serving as base and intermediate-load plants, natural-gas-fired generation has become a necessary balancing resource that enables reliable integration of VERs into the dispatch. As a result, the BES has never been more dependent upon the round-the-clock continuity of just-in-time natural gas delivery. The past two winters have seen interruptions of natural gas delivery to generators that resulted in energy deficiencies. Collaborative assessments involving NERC, the Regional Entities, the National Labs, and natural gas and electric power industry participants are needed to identify natural gas fuel supply needs for reliable operation of the BPS. NERC strongly endorses actions to establish reliability rules for the natural gas infrastructure necessary to support the grid as recommended in the Winter Storm Elliott report. Additionally, as part of future transmission and resource planning studies, planning entities will need to more fully understand how impacts to the natural gas transportation system can impact electricity reliability. The NERC reliability guideline, *Fuel Assurance and Fuel-Related Reliability Risk Analysis for the Bulk Power System*, provides planning guidance.⁸⁰

Initiative	Description	Product/Reliability Solution
Cold Weather Reliability Standards and Activities	Cold weather Reliability Standards adopted by the NERC Board of Trustees in June 2021 went into effect in the United States in 2023. Generator Owners and Generator Operators are required to implement plans for cold weather preparedness and provide cold weather operating parameters to their Reliability Coordinators, Transmission Operators, and BAs for use in operating plans. Additional Reliability Standard requirements were developed by NERC and industry to address further recommendations of the <i>FERC-NERC-Regional Entity Staff Report—The February 2021 Cold Weather Outages in Texas and the South Central United States</i> and respond to FERC directives.⁸¹ In September 2025, FERC approved EOP-012-3 with an effective date of October 1, 2025. The revised standard strengthens generator preparedness by providing clearer and more effective requirements. In the approval order, FERC also directed NERC to make information filings to FERC every two years beginning in October 2026 and continuing through October 2034, to assess the adequacy of the standard’s ability to address reliability concerns and inform potential future modifications.	Reliability Standards NERC Alerts Event Analysis Reports Lessons Learned
Inverter-Based Resources Strategy	NERC’s IBR strategy includes four key focus areas: Risk Analysis, Interconnection Process Improvements, Sharing Best Practices and Industry Education, and Regulatory Enhancements. The statuses of NERC’s extensive activities in each area are described in detail in the <i>IBR Activities Reference Guide</i>.⁸² NERC has investigated and analyzed IBR performance issues during grid disturbances dating back to 2016. Since that time, NERC and its technical groups have published a range of reliability guidelines for studying, modeling, controlling, and interconnecting IBRs. In partnership with many experts from across the industry, NERC maintains an active campaign of education, awareness, and outreach to support its strategy and reduce IBR performance risks. NERC and the RSTC recognized that Reliability Standard requirements would be needed as part of a comprehensive approach to reliability and undertook a full review of existing standards to identify gaps. Several reliability standards projects were initiated following this review. In October 2023, FERC issued Order No. 991, which provided clear direction for the industry to develop requirements that address reliability gaps related to IBR in data sharing, model validation, planning and operational studies, and performance requirements.	Reliability Standards NERC Alerts Reliability Guidelines Event Analysis Reports Lessons Learned Educational Webinars

⁸⁰ Informed by severe weather events of the past two winters, the 2023 triennial review of the NERC reliability guideline, *Fuel Assurance and Fuel-Related Reliability Risk Analysis for the Bulk Power System*, incorporated the *Design Basis for Natural Gas Study* developed by the ERO in 2022. The revised Guideline also identifies as fuel risks requiring evaluation many of the scenarios industry has encountered during recent periods of extreme cold weather and high demand for natural gas. The revised guideline is under review with the Reliability and Security Technical Committee. The approved and revised draft guideline can be found on the RSTC website: [NERC Reliability and Security Guidelines](#)

⁸¹ Refer to [Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination](#) and [Project 2024-03 Revisions to EOP-012-2](#) on NERC’s standards development page. [Project 2021-07 IBR Activities](#)

⁸² [IBR Activities](#)

LTRA Recommendations and Ongoing ERO Actions

	FERC issued an order in 2022 directing NERC to identify and register owners and operators of currently unregistered BPS-connected IBRs. ⁸³ Working closely with industry and stakeholders, NERC is executing a FERC-approved work plan to achieve the identification and registration directive by 2026. Resources are also posted on the Registration page of the NERC website.	
Natural Gas-Electric Interdependence Initiatives	Informed by severe weather events of the past two winters, the 2023 triennial review of the NERC reliability guideline, <i>Fuel Assurance and Fuel-Related Reliability Risk Analysis for the Bulk Power System</i> , incorporated the <i>Design Basis for Natural Gas Study</i> developed by the ERO in 2022. The revised guideline also identifies the fuel risks encountered by industry during recent periods of extreme cold weather and high demand for natural gas. These natural gas supply risks can inform industry’s development of planning scenarios. The revised guideline is under review with the RSTC. Refer to the RSTC-Approved Documents page. ⁸⁴	Reliability Guideline
Expand the transmission network to deliver supplies from new resources and locations to serve changing loads.		
1. Develop the transmission network: ISOs and RTOs should continue looking for opportunities to streamline transmission planning processes and reduce the time required for transmission development. However, addressing the siting and permitting challenges that are the most common cause for delayed transmission projects will require regulators and policymakers at the federal, state, and provincial levels to focus attention and provide support.		
Initiative	Description	Product/Reliability Solution
<i>Interregional Transfer Capability Study (ITCS)</i>	NERC completed the ITCS required by the Fiscal Responsibility Act of 2023 and filed the final report with FERC on November 19, 2024 ⁸⁵ . The ITCS is the first-of-its-kind assessment of transmission transfer capability under a common set of assumptions. However, the ITCS is not a transmission plan or blueprint. Transmission expansion analysis, resource plans, and other inputs must be considered in effective system planning. The ITCS is designed to provide foundational insights that facilitate stakeholder analysis and actions. Due to the interconnected nature of the BPS, NERC extended the study beyond the congressional mandate to identify and make recommendations for transfer capabilities from the United States to Canada and among Canadian provinces. The Canadian analysis was published in 2025. ⁸⁶ See Interregional Transfer Capability Study (ITCS) Canadian Analysis .	ERO Study and Recommendations

⁸³ [FERC Order Issued November 17, 2022](#)

⁸⁴ [RSTC Approved Documents](#)

⁸⁵ NERC’s [Interregional Transfer Capability Study \(ITCS\) Final Report](#)

⁸⁶ [NERC’s Interregional Transfer Capability Study \(ITCS\) Canadian Analysis Final Report](#)

LTRA Recommendations and Ongoing ERO Actions

Adapt BPS planning, operations, and resource procurement markets and processes to the realities of a more complex power system.

- 1. Use enhanced resource adequacy and energy risk assessments for determining resource needs:** PRMs are not sufficient for measuring resource adequacy for most areas because VERs and generator fuel supply issues expose additional energy risks. Resource Planners and wholesale markets need to use enhanced modeling that accounts for energy risks, such as all-hours probabilistic assessments. Multi-metric approaches to resource adequacy using load loss, unserved energy, and event magnitude and duration criteria and results from probabilistic studies will support achieving the levels of reliability that are required for modern society.
- 2. Resource contributions must be accurately represented in resource planning, wholesale electricity markets, and operating models:** Resource Planners and wholesale market designers must use appropriate methods for determining the contribution of resources to meeting demand. Weather-dependent resources, fuel supplies, and demand profiles result in seasonal risks. This can be seen in the increasing winter resource adequacy risks observed in the 2024 ProBA for many traditionally summer-peaking areas. ISO/RTOs can help reduce seasonal risks by implementing seasonal resource adequacy procurement (e.g., spring, summer, fall, winter) based on reserve requirements and resource performance that are tailored to each season. The explosive growth of BESS and hybrid resources seen in most areas requires additional details to be incorporated into operating and planning models, such as state of charge, BESS duration, and BESS operating mode.
- 3. Maintain sufficient amounts of flexible resources and essential reliability services:** To maintain load-and-supply balance in real-time with higher penetrations of variable supply and less-predictable demand, dispatchable generators must be available and capable of following changing electricity demand. Retirements of fossil-fired generators are reducing the amounts of dispatchable generation in many areas. As more solar PV and wind generation is added, additional flexible resources are needed to offset these resources’ variability, such as supporting solar down ramps when the sun goes down and complementing wind pattern changes. Natural-gas-fired generators and hydro generators have traditionally provided this ERS. Battery resources can provide flexibility during short durations, while new wind and solar PV have minimal assured flexibility. Maintaining ERSs is critically important. Resource Planners and wholesale electricity market operators should ensure resources are procured and made available in the long-range resource portfolio as part of the planning process; markets and other mechanisms need to be in place to deliver weather-ready resources with sufficient energy and ERS capabilities to the operators.⁸⁷
- 4. Include energy risks and extreme weather scenarios in resource and system planning:** Industry and regulators need to conduct all-hours analyses for evaluating and establishing resource adequacy and include extreme conditions in integrated resource planning and wholesale market designs. While more sophisticated capabilities for assessing extreme event risk are being developed, scenario planning can be more readily incorporated in resource and system planning. Scenarios should consider the potential effects of wide-area, long-duration extreme weather events, including the impact they can have on natural gas fuel supplies and on the interconnected energy system. NERC and the industry should continue to prioritize completion of new reliability standards supporting energy assurance in operating and planning time horizons, and for the assessment of extreme heat and cold weather events in transmission system planning.
- 5. Accommodate the growth of DERs:** Preparing the grid to operate with increasing levels of distributed resources is a priority for most areas. Data sharing, models, and information protocols are needed to support BPS planners and operators. Industry must continue to evaluate potential reliability concerns associated with increasing DER penetration and DER performance and, when necessary, develop reliability standards requirements to address identified gaps. DER aggregators will also play an increasingly important role for BPS reliability in the coming years. ISO/RTOs must consider how the implementation of DER aggregators in the wholesale market will affect BPS planning and operations.⁸⁸

⁸⁷ [NERC ERS Measure 6 Forward Tech Brief](#)

⁸⁸ A comprehensive guide to ERO activities on DERs can be found here: [DER Activities](#)

LTRA Recommendations and Ongoing ERO Actions

Initiative	Description	Product/Reliability Solution
Energy Assessments Initiatives	NERC conducts seasonal long-term and probabilistic reliability assessments and issues reports like this <i>2025 LTRA</i> to advise industry and stakeholders of findings on BPS adequacy, including energy adequacy. In recent years, NERC has enhanced the energy risk analysis in seasonal assessments by incorporating deterministic energy risk scenarios and introducing probability-based assessments. NERC’s ProbA uses hourly simulations to examine the ability of resources to meet demand over the entire study year, helping to identify energy risks that could otherwise go unaddressed by peak hour reserve margin resource adequacy analysis. NERC reliability assessments continue to evolve as more sophisticated energy assessment tools, models, and capabilities are developed. The RSTC created the Energy Reliability Assessment Working Group (ERAWG) to support wide adoption of technically sound approaches to energy assessments by BPS planners and operators. Working group projects and activities are described on the ERAWG page.⁸⁹ The working group is developing a technical reference document to inform registered entities on approaches and considerations for assessing and reducing the risk of energy shortfalls. New and revised Reliability Standards requirements for BPS planners and operators to address energy risks are in development in Project 2022-03 <i>Energy Assurance with Energy Constrained Resources</i>.⁹⁰ In other Reliability Standard development work, Project 2023-07 <i>Transmission System Planning Performance Requirements for Extreme Weather</i> requirements are being developed that will ensure entities consider extreme heat and cold weather scenarios in BPS planning, including the expected availability of the future resource mix.⁹¹	Reliability Assessments Reliability Standards
Distributed Energy Resources Strategy	NERC has proactively worked with industry stakeholders to identify BPS reliability risks associated with the increasing DER levels and has initiated actions to support broad awareness and education as well as to provide guidance for industry and enhance Reliability Standards where gaps exist. The statuses of NERC’s extensive activities in each area are described in detail in the <i>DER Activities Reference Guide</i> . ⁹²	Reliability Standards Reliability Guidelines Educational Webinars
Strengthen relationships among reliability stakeholders.		
Initiative	Description	Product/Reliability Solution
Ongoing Strategic Engagements	NERC and the Regional Entities engage in frequent dialogue and conduct outreach with regulators and policymakers at the state/provincial, regional, and federal/national levels.	Constructive Partnerships

⁸⁹ [ERAWG](#)

⁹⁰ [Project 2022-03](#)

⁹¹ [Project 2023-07](#)

⁹² [DER Activities](#)

Errata

February 2026

- Resource mix changes: Corrected natural gas, solar, wind, conventional hydro, battery, and total resource capacity for 2025 in Table 16. Corrected the caption of Figure 16 (p. 30).
- WECC British Columbia: Corrected highlights for BC Hydro’s most recent 10-year capital plan (p. 144 and 146), corrected the WRAP participation description (p. 145), corrected the DER programs (p. 145), and included a more current drought outlook from October 2025 in the Generation section (p.145)

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-179
SPP Deficiency Response

Attachment 1

SPP's Response to the October 3 Letter

Question 1

1. In your transmittal, you state that SPP does not propose any Tariff revisions for its generator interconnection procedures or transmission service study processes in these filings. You state that, upon integration and execution of the Membership Agreements by Expansion Members, Expansion Members' existing planning processes will be integrated into SPP's existing Tariff processes, which will continue to be consistent for all RTO members. You state that there are nevertheless certain transition plans that will be finalized between SPP and Expansion Members prior to the planned effective date.¹
 - a. Regarding transmission service requests, you explain that SPP and Expansion Members are developing a plan to transition transmission service requests that are granted by Expansion Members prior to the effective date into SPP's Open Access Same-Time Information System. For those transmission service requests still being processed on the effective date, you state that SPP is working with Expansion Members on a plan to consolidate Expansion Members' transmission service request queues into SPP's transmission service request queue.²
 - i. Please identify any existing Tariff provisions that will apply to facilitate the transition of Expansion Members' transmission service request queues into SPP's existing transmission service study processes.
 - ii. If no existing Tariff provisions apply, please explain how SPP plans to transition Expansion Members' transmission service request queues into SPP's existing transmission service study processes, including a general timeline for the proposed transition.
 - b. Regarding generator interconnection procedures, you state that SPP is working to consolidate Expansion Members' current generator interconnection requests into the SPP generator interconnection study process, beginning on the effective date. You note that application of SPP's generator interconnection procedures to Expansion Members' interconnection requests will depend on the process stage that Expansion Members' interconnection requests are in as of the effective date. Further, you state that SPP expects to clear its current interconnection queue backlog in advance of the planned effective date but that, if it is unable to do so, it

¹ Submission of Revisions to Tariff, Bylaws, and Membership Agreement to Expand the Regional Transmission Organization into the Western Interconnection of Southwest Power Pool, Inc., Transmittal Letter at 21, Docket No. ER24-2184-000 (June 4, 2023) ("Transmittal Letter").

² *Id.*

may make a future filing with the Commission requesting to process interconnection requests separately in the Eastern Interconnection and the Western Interconnection until SPP is able to clear the current backlog.³

- i. Please identify any existing Tariff provisions that SPP will apply to facilitate the transition of Expansion Members' generator interconnection queues into SPP's existing generator interconnection study processes.
- ii. If no existing Tariff provisions apply, please explain how SPP plans to transition Expansion Members' generator interconnection queues into SPP's existing generator interconnection study processes, including a general timeline for the proposed transition.

Question 1 Response:

1.a(i):

Similar to other expansions of the SPP RTO,⁴ there are no existing Tariff provisions that outline the transition of Expansion Members' transmission service request queues into SPP's existing transmission service study processes. Although no Tariff provisions exist, SPP will be following a similar transition facilitation process as it has in previous expansion efforts of the SPP RTO to ensure that transmission service is integrated into SPP's existing transmission service study process.⁵

1.a(ii):

SPP studies requests for Long-Term Service (transmission service with a duration of one-year or longer) through its Aggregate Transmission Service Study ("ATSS") process.⁶ Under the ATSS

³ *Id.* at 21-23.

⁴ *Sw. Power Pool, Inc.*, 149 FERC ¶ 61,113 (2014) ("Integrated Systems Order"). *Southwest Power Pool, Inc.*, 125 FERC ¶ 61,239 (2008) (Order approving the expansion of SPP to include the Nebraska entities).

⁵ *Sw. Power Pool, Inc.*, Letter Order, ER14-2850-009 (November 3, 2016). This letter order accepted SPP's compliance filing required by the Integrated Systems Order. In the compliance filing, SPP explained the transition process of integrating the Integrated System members' GI Queues and transmission service request queues into SPP's processes.

⁶ The details of the ATSS process can be found in Sections 19.4, 32.4 and Attachment Z1 of the Tariff. Additional information on the ATSS process is posted on the Transmission Service Studies page of the SPP website at: <https://opsportal.spp.org/Studies/Trans>.

process, SPP has open seasons for the submittal of Long-Term Service requests.⁷ Upon the close of an open season, all transmission service requests entered during the open season are combined into a single ATSS group and an Aggregate Facilities Study is performed to determine the transmission system upgrades that may be needed to accommodate the requests in that group.⁸

Any entity requesting Long-Term Service across the Expansion Members' facilities that will be processed on or after proposed effective date of April 1, 2026 ("Effective Date") should enter the necessary transmission service requests⁹ into the ATSS process during the first scheduled open season of the ATSS. The first open window for the ATSS opens on December 1st and closes on May 31st. The second open window for the ATSS opens on June 1st and closes on November 30th. Any transmission service request entered into the ATSS process will be completed in accordance with the procedures prescribed in the Tariff.¹⁰

The process and requirements for obtaining Short-Term Service (transmission service with a duration shorter than one-year) are outlined in Attachment C of the Tariff. For an entity that has Short-Term Service reservations that are queued on an Expansion Member's Open Access Same-Time Information System ("OASIS") submitted with a start time prior to the Effective Date and a stop time after the Effective date will concurrently, with its transmission service reservation on the Expansion Member's OASIS, submit a transmission service reservation on SPP's OASIS starting on the Effective Date. The purpose for the concurrent transmission service reservation submittal to both the Expansion Member's OASIS and the SPP's OASIS is to prevent the inclusion of these transmission service reservations in SPP Settlement's monthly transmission service invoicing for any duration of the transmission service reservation before April 1, 2026.

Any existing or additionally granted Long-Term and Short-Term Service on the Expansion Members' transmission system ending after the Effective Date will be transitioned to equivalent transmission service on the SPP System by following the process described in Section 29.2 and Attachment C of the Tariff.¹¹ Expansion Members are required to submit a new application with SPP for these transitioned transmission services. There will be no ATSS or Short-Term Service study necessary if there are no material changes in the transmission service arrangements. Material changes in transmission service include, but are not limited to, designation or un-designation of

⁷ Tariff at Attachment Z1, Section II.

⁸ *Id.* at Section III.

⁹ In order to submit a transmission service request on the SPP OASIS, an entity must first complete the customer registration process. More information on the customer registration process can be found on the SPP website at: <https://www.spp.org/stakeholder-center/join-spp/>.

¹⁰ Tariff at Attachment Z1, Section III.

¹¹ Tariff at Part III, Section 29.2 and Attachment C.

Network Resources or Network Loads, changes to MW amounts, POR/POD, Source/Sink, Customer Name, and re-directions.

1.b(i):

Similar to other expansions of the SPP RTO,¹² there are no existing Tariff provisions that outline the transition of Expansion Members' generator interconnection queues into SPP's existing generator interconnection study processes. Although no Tariff provisions exist, SPP will be following a similar transition facilitation process as it has in previous expansion efforts of the SPP RTO.¹³

1.b(ii):

Beginning on the proposed Effective Date, all new interconnection requests seeking to interconnect to the SPP Transmission System, which will include the transmission systems of the Expansion Members, will be submitted in the SPP generator interconnection queue consistent with the requirements in Attachment V of the Tariff.¹⁴ All interconnection requests with a system impact study agreement executed by an Expansion Member as of the close of business on the day prior to the Effective Date and where the final system impact study report has not been completed, may be studied under the terms of the executed study agreement with the Expansion Member or the interconnection customer may terminate the study agreement and transition the request to SPP's generator interconnection queue. Should the interconnection customer elect to remain in the Expansion Member's study queue, following completion of the system impact study and upon issuance of the final interconnection facilities study ("IFS") report by an Expansion Member, SPP will tender a Generator Interconnection Agreement ("GIA") to the Interconnection Customer in accordance with Section 11 of the Generator Interconnection Procedures ("GIP"). Interconnection Customers that elect to terminate the system impact study agreement with the Expansion Member and enter SPP's generator interconnection queue will enter the next open Definitive Interconnection System Impact Study ("DISIS") Queue Cluster Window, if one is not currently open as of the Effective Date.

Interconnection Customers with executed Expansion Member's IFS agreements where the final IFS report is not complete as of the close of business on the Effective Date will have their IFS completed by the Expansion Member in accordance with the terms of their IFS agreement, and upon completion of the IFS will receive an SPP GIA for execution in accordance with Section 11 of the GIP. Similarly, all Interconnection Requests where the Interconnection Customer has received a final IFS report from an Expansion Member but does not have an executed GIA as of

¹² *Supra* at n.4.

¹³ *Supra* at n.5.

¹⁴ Tariff at Attachment V, Section 3.

the Effective Date, will receive an SPP GIA for execution in accordance with Section 11 of the GIP.

In the event SPP has not cleared its existing generator interconnection backlog as of the Effective Date,¹⁵ SPP has committed to making a filing with the Commission to establish a separate interconnection queue for interconnection requests seeking to interconnect to an Expansion Members' transmission system.¹⁶ This filing will ensure that these interconnection requests are not queued for study after those requests that are backlogged and pending study in SPP's generator interconnection queue.

Question 2

2. In your transmittal, you state that SPP proposes to add provisions to sections 4.2.2(b)(vi) and (vii) of the Membership Agreement that will allow any SPP Member that has transmission facilities in either of two of the five new, proposed transmission pricing zones in the Western Interconnection—specifically, the Colorado River Storage Project Zone (CRSP Zone) and the Loveland Area Projects Zone (LAP Zone)—to terminate the Membership Agreement with less than the required 24 months' notice if: (1) WAPA-CRSP, WAPA-RMR, Basin Electric, or Tri-State withdraws from SPP in accordance with their respective withdrawal rights; or (2) the Commission finds that SPP has not adhered to all of the WAPA-CRSP and WAPA-RMR Federal Power Marketing Agency Amendments or the Basin Electric Amendments.¹⁷ SPP's proposed Membership Agreement Amendments set forth the respective withdrawal rights for WAPA-CRSP, WAPA-RMR, and Basin Electric, but not Tri-State.
 - a. Please explain why SPP proposes to allow any SPP member with facilities in the CRSP Zone or LAP Zone to withdraw with less than 24 months' advance notice if WAPA-CRSP, WAPA-RMR, Basin Electric, or Tri-State withdraw from SPP.
 - b. Please provide further explanation of Tri-State's respective withdrawal rights and how those rights relate to the CRSP Zone and LAP Zone.
 - c. Please explain why the proposed withdrawal rights in sections 4.2.2(b)(vi) and (vii) of the Membership Agreement are limited to SPP members with transmission facilities in the CRSP Zone or LAP Zone.

¹⁵ Pursuant to Attachment V, Section 5, the Backlog Mitigation Period concludes following Decision Point for the DISIS-2023-001 cluster.

¹⁶ See June 2024 Filing at 23.

¹⁷ *Id.* at 26-27, 185-187; SPP, Proposed Membership Agreement § 4.2.2(b)(vi)-(vii); *see also id.* § 1 (defining Federal Power Marketing Agency Amendments and Basin Electric Amendments).

Question 2 Response:

2.a:

When Western Area Power Administration, Upper Great Plain Region (“WAPA-UGP”), Basin Electric Power Cooperatives (“Basin Electric”), and Heartland Consumers Power District (“Heartland”) (collectively “Integrated System”) joined SPP, SPP requested revisions to the SPP Membership Agreement to allow any Member with transmission facilities located in the Upper Missouri Zone (“UMZ”) to withdraw from SPP with less than the required twenty-four (24) month notice in the event that WAPA-UGP or Basin Electric withdraws from SPP in accordance with its respective withdrawal rights.¹⁸ The Commission approved these proposed revisions based on SPP’s explanation that the withdrawal provisions are necessary due to the integrated nature of the facilities owned by Basin Electric, Heartland, and WAPA-UGP.¹⁹ The Commission also pointed out in the Integrated Systems Order that the withdrawal obligations for the Integrated System are similar to provisions the Commission accepted to facilitate the integration of the entities in Nebraska (Lincoln Electric Systems, Omaha Public Power District, and Nebraska Public Power District) in Docket No. ER08-1601.000. Overall, the UMZ, as a multi-owner pricing Zone that was highly integrated, was only a viable Zone if they maintained critical mass of those Transmission Owners.

Similar to the Integrated System, the transmission facilities of Transmission Owners in the CRSP Zone and the LAP Zone are highly integrated. If Western Area Power Administration-Colorado River Storage Project Management Center (“WAPA-CRSP”), Western Area Power Administration-Rock Mountain Region (“WAPA-RMR”), Basin Electric, or Tri-State were to terminate membership in SPP, it would be necessary for all Transmission Owners in CRSP Zone and the LAP Zone to also terminate membership or effectuate a Partial Termination in that zone. Requiring Transmission Owners in the CRSP Zone and the LAP Zone to provide at least twenty-four months’ notice would result in those entities being unreasonably and unduly harmed by being forced to wait to withdraw from SPP even though their transmission facilities are part of highly integrated system that will no longer be under SPP’s functional control. Similar to when the Integrated System joined SPP, the CRSP Zone or LAP Zone will become non-viable pricing zones if WAPA-CRSP, WAPA-RMR, Basin Electric, or Tri-State were to terminate membership in SPP,

¹⁸ Revisions to Tariff, Bylaws, and Membership Agreement of Southwest Power Pool, Inc., Docket ER14-2850 (Sept. 11, 2014).

¹⁹ *Sw. Power Pool, Inc.*, 149 FERC ¶ 61,113, at P 134, P 136 (2014) (“Integrated System Order”).

and the transmission facilities within those zones will need to be transitioned out of the SPP if the loss of critical mass results in the elimination of either or both of those zones from the RTO.

It should be noted that although SPP is requesting in this filing an exemption from the twenty-four month (24) withdrawal notice provisions under the Membership Agreement, any Member who exercises its withdrawal rights under the Membership Agreement will still be responsible for other withdrawal obligations outlined in the Membership Agreement and Bylaws.

2.b:

SPP did not request in its original filing to include any unique amendments to the Membership Agreement on Tri-State's behalf, unlike the unique amendments for current federal members or federal Expansion Members. Outside the withdrawal notice provisions referenced above in response to 2.a, Tri-State's respective withdrawal rights are outlined in the standard provisions in the Membership Agreement and Bylaws.

Tri-State's transmission system located in the CRSP Zone and the LAP Zone, as stated above in response to 2.a, is highly integrated into the transmission systems of other Transmission Owners in those Zones. These integrated transmission systems in the CRSP Zone and the LAP Zone necessitate similar notice provisions for Tri-State if WAPA-CRSP, WAPA-RMR, or Basin Electric were to provide less than twenty-four months' notice of withdrawal from SPP.

2.c:

The withdrawal notice provisions are only applicable to Transmission Owners in the CRSP Zone and the LAP Zone, because these are the only Zones that will be in the SPP West Region when the Commission approves the Proposed Tariff revisions that have numerous Transmission Owners with highly integrated transmission systems. This is similar to the notice provisions applied to the Transmission Owners located in the UMZ (as approved in the Integrated Systems Order). The UMZ is the only Zone in SPP that currently has these similar proposed withdrawal rights.

Question 3

3. In your transmittal, you state that SPP proposes to extend the Federal Service Exemption²⁰ to include WAPA-CRSP Replacement Energy, as necessitated by the Grand Canyon

²⁰ As part of WAPA-UGP's integration into SPP as a transmission-owning member in 2015, the Commission accepted revisions to the Tariff to implement a Federal Service Exemption, which exempts transactions for the transmission of federal power to serve WAPA-UGP's statutory preference customers from congestion and marginal loss charges. *See Sw. Power Pool, Inc.*, 149 FERC ¶ 61,113, at PP 48-53 (2014); *see also* Proposed Tariff at Part I, Section 1 (F-Definitions).

Protection Act of 1992.²¹ The Proposed Tariff provides that WAPA-CRSP Replacement Energy is “necessitated by WAPA-CRSP’s inability to deliver sufficient energy from reservoir projects under the control of the U.S. Bureau of Reclamation in the marketing area of WAPA-CRSP for reasons such as persistent drought or environmental constraints.”²² You explain that the purpose of FSE-Qualified WAPA-CRSP Replacement Energy is to provide energy, as needed, for WAPA-CRSP to meet its Statutory Load Obligations,²³ after using WAPA-CRSP’s available hydroelectric generation.²⁴

- a. Please explain whether WAPA-CRSP Replacement Energy includes energy acquired to fulfill WAPA-CRSP’s Statutory Load Obligations due to WAPA-CRSP’s inability to deliver sufficient energy from: (1) *any* reservoir project under the U.S. Bureau of Reclamation’s control in the WAPA-CRSP marketing area; or (2) only WAPA-CRSP’s Glen Canyon Plant.
- b. If the former, please explain in further detail why applying the Federal Service Exemption to WAPA-CRSP Replacement Energy is necessitated by the Grand Canyon Protection Act of 1992.

Question 3 Response:

3.a:

The WAPA-CRSP Replacement Energy provisions requested by SPP in the Proposed Tariff revisions are necessary based on the Energy Policy Act of 2005 and WAPA-CRSP’s response to the Grand Canyon Protection Act of 1992. To aid the Commission in response to this question, SPP requested that WAPA-CRSP provide additional clarification of their federal statutory requirements and obligations under the Grand Canyon Protection Act of 1992 and the Energy Policy Act of 2005. Attached to these responses as Exhibit No. SPP-0001 to Attachment A is a letter from WAPA-CRSP outlining their statutory obligations under the Grand Canyon Protection Act of 1992 and the Energy Policy Act of 2005.

²¹ Reclamation Projects Authorization and Adjustment Act of 1992, Pub. L. No. 102-575, 106 Stat. 4600, §§ 1801–09 (1992).

²² Proposed Tariff at Part 1, Section 1 (W-Definitions).

²³ *Id.* (defining Statutory Load Obligations as a “WAPA-Division’s power marketing function obligations under Federal law to deliver power and energy to loads which include project use loads, preference power customer loads located in that WAPA-Division’s marketing area defined pursuant to its power marketing plan, and other loads required to be served under Federal law. For WAPA-CRSP, Statutory Load Obligations also includes WAPA-CRSP’s contractual obligations pursuant to its power marketing plan.”).

²⁴ Transmittal Letter at 29.

As described in the letter from WAPA-CRSP, WAPA-CRSP Replacement Energy provisions are not limited to only WAPA-CRSP's Glen Canyon Plant's inability to deliver sufficient energy. WAPA-CRSP Replacement Energy provisions are applicable to any reservoir project under the U.S. Bureau of Reclamation's control in the WAPA-CRSP marketing area.

3.b:

See Exhibit No. SPP-0001 to Attachment A.

Question 4

4. In your transmittal, you state that the proposed expansion into the Western Interconnection will create new metered boundaries and a need to establish a second BAA, which will be incorporated into SPP's Integrated Marketplace. You explain that, under the revised Tariff, the three components of locational marginal price (LMP) in the Integrated Marketplace will be calculated on a BAA basis and, to effectuate those calculations, a separate reference bus will be needed for each BAA. You explain that, although a new reference bus will be established in the SPP West BAA, LMPs will continue to represent the marginal cost of serving demand at the price node while meeting the operating reserve requirements.

Please provide more information regarding how two separate reference busses, one for each BAA, will accurately model the marginal cost of serving load in each BAA, including the cost of congestion.

Question 4 Response:

A reference bus is a construct used in power flow analysis of a *single interconnected AC network* to describe how power flows through the electrical transmission equipment in a defined electrically interconnected AC network. Today, the SPP Integrated Marketplace utilizes a single reference bus, which is possible because the SPP market exists in a single AC interconnection, the Eastern Interconnection. With the proposed RTO expansion, there will be two electrically asynchronous Balancing Authority Areas ("BAA" or "BAAs") connected by the dispatchable West DC Ties.²⁵ To accurately model the marginal cost of serving load, including the cost of congestion, in each BAA, SPP must use a separate reference bus in each BAA.

While the Eastern and Western networks are not synchronously connected, SPP will determine a single optimized solution to effectuate one integrated market across the Eastern and Western networks. The market optimization simultaneously determines flows across the West DC Ties and the dispatch and prices in both networks. Each West DC Tie is modeled as a linked withdrawal/injection pair, joining the two BAAs together at the location of that West DC Tie. The modeling of the West DC Ties' capability to transfer Energy between the BAAs will connect the power balance and prices between the two BAAs within the single market optimization. The

²⁵ See SPP, Inc., DC Tie Proposal RTO West at 5 (July 12, 2022), <https://spp.org/documents/68648/rto%20west%20dc%20tie%20proposal%20final.pdf>.

withdrawal will be modeled within the sending BAA and will represent the amount of Energy being transferred across the West DC Tie. The injection will be modeled within the receiving BAA and will be equal to the sending withdrawal minus losses across the West DC Tie. This modeling allows the market optimization to determine the most economical way to meet obligations across both BAAs. In this way, the market optimization will accurately model the marginal cost of serving load, including the cost of congestion, in each BAA.

SPP will calculate the locational marginal prices (“LMP” or “LMPs”) for both BAAs as it does today in the Integrated Marketplace for the Eastern Interconnection. The LMP is the cost to serve the next incremental MW of Energy at each node. Imbedded in this LMP is the marginal cost of Energy, the marginal cost of losses, and the marginal cost of congestion. Utilizing a reference bus for each network allows the marginal cost of losses and the marginal cost of congestion to only represent the losses and congestion for that synchronous network. The marginal cost of Energy is the computed LMP at the reference bus.²⁶ The LMP at the reference bus will reflect each BAA’s economic value of balancing power for that network.

The ability to move energy between the Eastern and Western networks using the West DC Ties impacts the marginal cost to serve load in each interconnection. When there is available capacity of flow on any of the West DC Ties, the marginal cost to serve load in each BAA will be influenced by the cost of the marginal Resource(s) and losses on the West DC Ties. For example, if the marginal Resource(s) is located in the Western network, the Resource may contribute to the marginal cost of serving load in both the Western network and the Eastern network. The resulting marginal cost in each BAA will only differ because of the losses that occur on the West DC Ties. When there is not available capacity of flow on any of the West DC Ties, the next increment of load within each BAA must be served from within that BAA. Therefore, the marginal Resource(s) within each BAA will determine the marginal cost of serving load within that BAA.

Question 5

In your transmittal, you state that you will optimize the West DC Ties within the Integrated Marketplace.²⁷

Please explain whether, and if so, how, the LMPs on the two sides of the West DC Ties will inform how SPP optimizes the use of those interties. If not, please explain how SPP will determine the optimal use of the West DC Ties.

Question 5 Response:

²⁶ Tariff at Attachment AE, Section 8.3.1.3.

²⁷ *Id.* at 5.

The LMP on the two sides of each West DC Tie will not inform how SPP optimizes the use of the interties. Rather, SPP will determine the optimal use of the West DC Ties and the LMPs through the simultaneously co-optimized market solution that is used to minimize production cost.

Market dispatch across the West DC Ties is driven by the forward-looking economics in each BAA. SPP will determine the optimal use of each West DC Tie through the use of Security Constrained Unit Commitment (“SCUC”)²⁸ and Security Constrained Economic Dispatch (“SCED”)²⁹ to meet system requirements on a least cost basis. SPP will optimize the direction of the flow across each West DC Tie through the SCUC process and optimize the volume of the flow across each West DC Tie through the SCED process.

The SCUC is an algorithm that commits Resources while maintaining operating limits to meet system obligation and Operating Reserve requirements based on the topology, system, and Resource constraints on a least cost basis. With the proposed RTO Expansion, SCUC will now include constraints for topology, system, and Resources for each BAA and the West DC Tie operational constraints. As a result, SCUC will determine the direction of the flow across each West DC Tie. During the Day-Ahead Market process, the SCUC will optimize an initial direction for each West DC Tie. As real-time approaches, the SCUC will continue to evaluate the optimal direction of the flow across each West DC Tie during each RUC process, which occurs at least every four hours.

The SCED is an algorithm that dispatches, clears, and prices Energy and Operating Reserve to meet system obligations and Operating Reserve requirements based on the topology, system, and Resource constraints on a least cost basis. With the proposed RTO Expansion, SCED will now include constraints for topology, system, and Resources for each BAA and the West DC Tie operational constraints. As a result, SCED will determine the volume of the flow across each West DC Tie for every five-minute interval.

Question 6

6. In your transmittal, you state that Schedules 7 and 8 of the Tariff detail the rates associated with firm point-to-point transmission service and non-firm point-to-point service, respectively; Schedule 11 of the Tariff details Base Plan Zonal Charges and Region-Wide Charges; and Attachment L details the payment and distribution of revenues. The proposed revisions to Schedules 7 and 8 provide that, for point-to-point transmission service where the load is located “within a Balancing Authority Area external to the SPP Region and interconnected to the SPP

²⁸ Tariff at Attachment AE, Section 1.1 S (Definition of Security Constrained Unit Commitment).

²⁹ Tariff at Attachment AE, Section 1.1 S (Definition of Security Constrained Economic Dispatch).

West Region,” the transmission customer will pay the SPP West Region’s average zonal rate (per kW of reserved capacity).³⁰ The proposed revisions to Schedules 7 and 8 further provide that, for point-to-point transmission service where the load is located “within a Balancing Authority Area external to the SPP Region and interconnected to the SPP East Region,” the transmission customer will pay the zonal rate for the pricing zone interconnected with such external Balancing Authority Area or, where more than one zone is interconnected to the external Balancing Authority Area, the lowest zonal rate of the interconnected zones.³¹ The proposed revisions to section III.A of Schedule 11 provide that the Base Plan Zonal Charge will be assessed to transmission customers taking point-to-point transmission service and, where load is “located within a Balancing Authority Area external to the SPP Region and interconnected” to either the SPP East Region or the SPP West Region, the transmission customer will pay the Base Plan Average Zonal Rate (per kW of reserved capacity) in the SPP East Region or the SPP West Region, respectively.³² Section II.C.2 of Attachment L provides for the distribution of revenues for point-to-point transmission service where the generation source(s) and load(s) are located *within a single zone*. The proposed revisions in section II.C.3 include provisions for the distribution of revenues for point-to-point transmission services in all instances other than that described in section II.C.2, but only for service “sinking in the SPP East Region” or “sinking in the SPP West Region.”³³ Similarly, section III.B of Schedule 14 provides that a DC Tie Access Charge will be assessed to transmission customers taking firm point-to-point transmission service when the transmission service request utilizes a West DC Tie, for “service into or within the SPP Region” and for “service where the load is located within a Balancing Authority Area external to the SPP Region and interconnected to” either the SPP East Region or the SPP West Region.³⁴

- a. Please explain, under the proposed revisions to Schedules 7 and 8 of the Tariff, what rate(s) would apply to point-to-point transmission service over the SPP transmission system where the load is located within a BAA external to the SPP Region but *not* interconnected to the SPP East Region or the SPP West Region, and please identify and explain any applicable provisions in the revised Tariff that would apply to this situation.

³⁰ Proposed Tariff at Schedule 7, § 1; *id.*, Schedule 8, § 1.

³¹ *Id.*, Schedule 7, § 1; *id.*, Schedule 8, § 1.

³² *Id.*, Schedule 11, § III.A.

³³ *Id.*, attach. L, § II.C.3.

³⁴ *Id.*, Schedule 14, § III.B; *see id.*, pt. I, § 1 (defining DC Tie Access Charge as a “charge on a transmission reservation utilizing a West DC Tie that sinks outside of the Zone where the West DC Tie is located. The Transmission Customer shall be responsible for DC Tie Access Charge determined in accordance with Schedule 14.”).

- b. Please explain, under the proposed revisions to Schedule 11 of the Tariff, what rate(s) would apply to point-to-point transmission service over the SPP transmission system where the load is located within a BAA external to the SPP Region but *not* interconnected to the SPP East Region or the SPP West Region, and please identify and explain any applicable provisions in the revised Tariff that would apply to this situation.
- c. Please explain, under proposed Schedule 14, what DC Tie Access Charge would apply to point-to-point transmission service over the SPP transmission system where the load is located within a BAA external to the SPP Region but *not* interconnected to the SPP East Region or the SPP West Region, and please identify and explain any applicable provisions in the revised Tariff that would apply to this situation.
- d. Please explain how revenues from point-to-point transmission service—where the load is external to the SPP East Region and SPP West Region—will be distributed and identify any applicable provisions under the revised Tariff that would apply to this situation.

Question 6 Response:

6.a:

SPP Transmission Service charges apply for use of only the SPP Transmission System regardless of the location for the ultimate delivery to end-use load. Because any additional transmission service arrangements that a Transmission Customer needs beyond the SPP Region are not the responsibility of SPP, the point at which any “through and out” Transmission Service exits the SPP Region is the relevant information for SPP Transmission Service charges under Schedule 7 or 8. Moreover, it is not feasible for SPP to transmit power to a Point of Delivery that is not interconnected with the SPP Transmission System. Stated another way, from an SPP Transmission Service perspective, the external load is located at the designated Point of Delivery and that Point of Delivery must be interconnected with the SPP Transmission System.

The purpose of the proposed revisions to Schedules 7 and 8 of the Tariff is to distinguish between charges for Point-To-Point Transmission Service that ultimately exits the SPP Region from the SPP East Region versus from the SPP West Region. For service exiting from the SPP Region via the SPP West Region, the applicable Schedules 7 and 8 rate is based on an average for all the Zones in the SPP West Region. However, for service exiting from the SPP Region via the SPP East Region, the applicable Schedules 7 and 8 rate is dependent upon the location at which the Point-To-Point Transmission Service exits the SPP Region. For such Transmission Service exiting from the SPP East Region, the Transmission Customer shall pay the least cost zonal rate of the Zones interconnected with the designated Point of Delivery external to the SPP region, which as noted above, must be interconnected with the SPP Transmission System.

In the proposed Tariff language changes for Schedules 7 and 8, SPP uses the term “Balancing Authority Area” to refer to the Point of Delivery, which for through and out Transmission Service is outside of the SPP Region but interconnected with the SPP Transmission System. However, the proposed language does not specifically use the term “Point of Delivery.” In contrast, the currently effective language in Schedule 7 and Schedule 8 uses the term “Point of Delivery” to clarify its application of “Balancing Authority Area.” Additionally, in the proposed Tariff language modifications for Schedules 7 and 8, SPP use the phrase, “within a Balancing Authority Area external to the SPP Region and interconnected,” in describing the case of a Transmission Service reservation which exits the SPP Region. Although this phrase is accurate, the description can be further simplified. In order to clarify both of these issues in the proposed language, SPP is willing to implement additional changes to Section 1 of Schedule 7 and Section 1 of Schedule 8, as shown in Exhibit No. SPP-0002 of this response, by means of a compliance filing. Utilizing the term “Point of Delivery” emphasizes the fact that the relevant factor in rate determination under Schedules 7 and 8 is the location to which SPP *delivers* power with its Transmission Service.

6.b:

Please see the response to question 6.a.

The zonal rate charged under Schedule 11 for Point-To-Point Transmission Service that exits the SPP Region, either from the SPP East Region or from the SPP West Region, will be determined based on the average for all the Zones in the SPP East Region or the average for all the Zones in the SPP West Region, respectively.³⁵ The region-wide rate charged under Schedule 11 for Point-To-Point Transmission Service that exits the SPP Region, either from the SPP East Region or from the SPP West Region, will be determined based on the aggregate for all regionally allocated facilities in the SPP East Region or the aggregate for all regionally allocated facilities in the SPP West Region, respectively.³⁶ Therefore, the specific Balancing Authority Area of delivery for Transmission Service exiting from the SPP East Region or SPP West Region is not a consideration in rate determination, but rather the rate is determined based on the more general consideration of whether the Transmission Service exits the SPP Region from the SPP East Region or SPP West Region, using applicable rate components for each.

As explained in the response to question 6.a, the phrase, “within a Balancing Authority Area external to the SPP Region and interconnected,” can be expressed in a simpler and more direct fashion to describe Transmission Service that exits the SPP Region. In order to clarify the proposed language, SPP is willing to implement additional changes to Section III.A of Schedule 11, as shown in Exhibit No. SPP-0003 of this response, by means of a compliance filing.

6.c:

³⁵ Proposed Tariff at Section III.A of Schedule 11.

³⁶ Proposed Tariff at Section III.B of Schedule 11.

Please see the response to question 6.a.

The Transmission Customer shall pay a DC Tie Access Charge when that Transmission Customer's Transmission Service request utilizes a West DC Tie. The DC Tie Access Charge applied to such service shall be the applicable rate for the West DC Tie utilized for the Transmission Service. However, because the DC Tie Access Charge is adjusted to prevent double charges when the applicable Schedule 7 charges include the West DC Tie ATRR, the locational basis for Schedule 7 charges is also the relevant locational basis for the DC Tie Access Charge adjustment.

For Transmission Service traversing the SPP Transmission System, and utilizing a West DC Tie, to serve load located external to the SPP Region and exiting from the SPP East Region, the Transmission Customers pay the least cost interconnected zonal rate for Schedule 7 charges as described in the response to question 6.a. If the Zone that is the basis for the least cost interconnected zonal Schedule 7 rate includes the applicable West DC Tie ATRR, the DC Tie Access charge is adjusted to \$0. If the Zone that is the basis for the least cost interconnected zonal Schedule 7 rate does not include the applicable West DC Tie ATRR, the applicable unadjusted DC Tie Access Charge applies.³⁷

For Transmission Service traversing the SPP Transmission System, and utilizing a West DC Tie, to serve load located external to the SPP Region and exiting from the SPP West Region, the Transmission Customers pay the SPP West Region average zonal rate for Schedule 7 charges. Because the SPP West Region average zonal rate includes the applicable West DC Tie ATRR, the applicable DC Tie Access Charge is adjusted to account for revenues distributed to the West DC Tie Transmission Owner from Schedule 7 recovery of the DC Tie ATRR's proportion of the average rate applied to through and out service from the SPP West Region for the same service.³⁸

As explained in the response to question 6.a, the phrase, "within a Balancing Authority Area external to the SPP Region and interconnected," can be expressed in a simpler and more direct fashion to describe Transmission Service that exits the SPP Region. In order to clarify the proposed language, SPP is willing to implement additional changes to Subsections III.B.2 and III.B.3 of Schedule 14, as shown in Exhibit No. SPP-0004 of this response, by means of a compliance filing.

6.d:

Revenue under Schedules 7 and 8:

Revenue under Schedules 7 and 8 that is collected for Point-To-Point Transmission Service which exits the SPP Region from the SPP East Region is to be distributed to Transmission Owners under the provisions of Subsection II.C.3.a of Attachment L and revenue under Schedules 7 and 8 that is collected for Point-To-Point Transmission Service which exits the SPP Region from the SPP West Region is to be distributed to Transmission Owners under the provisions of Subsection II.C.3.b of Attachment L. In other words, such revenue is to be distributed with the same methodology that is used for any Point-To-Point Transmission Service that does not source and sink within a single

³⁷ Proposed Tariff at Section III.B.2 of Schedule 14.

³⁸ Proposed Tariff at Section III.B.3 of Schedule 14.

Zone. However, the proposed language in these two subsections does not explicitly address Transmission Service which exits the SPP Region. In order to ensure that Schedule 7 and 8 revenue distribution for Transmission Service that exits the SPP Region is addressed explicitly, SPP is willing to implement additional changes to Subsections II.C.3.a and II.C.3.b of Attachment L, as shown in Exhibit No. SPP-0005 of this response, by means of a compliance filing.

Revenue under Schedule 11:

All revenue under Schedule 11, from both Point-To-Point Transmission Service and Network Integration Transmission Service, is to be distributed to Transmission Owners under the provisions of Section III of Attachment L. These provisions, which are based on revenue distribution in proportion to the revenue requirements of Schedule 11 Network Upgrades, do not require separate treatment of Schedule 11 revenue derived from Point-To-Point Transmission Service which exits the SPP Region.

Revenue under Schedule 14:

All revenues received by the Transmission Provider associated with the DC Tie Access Charge pursuant to Schedule 14 of this Tariff shall be distributed to the applicable West DC Tie Transmission Owner(s) under Section IV.13 of Attachment L. This includes any such DC Tie Access Charge revenue received from Point-To-Point Transmission Service that exits the SPP Region.

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

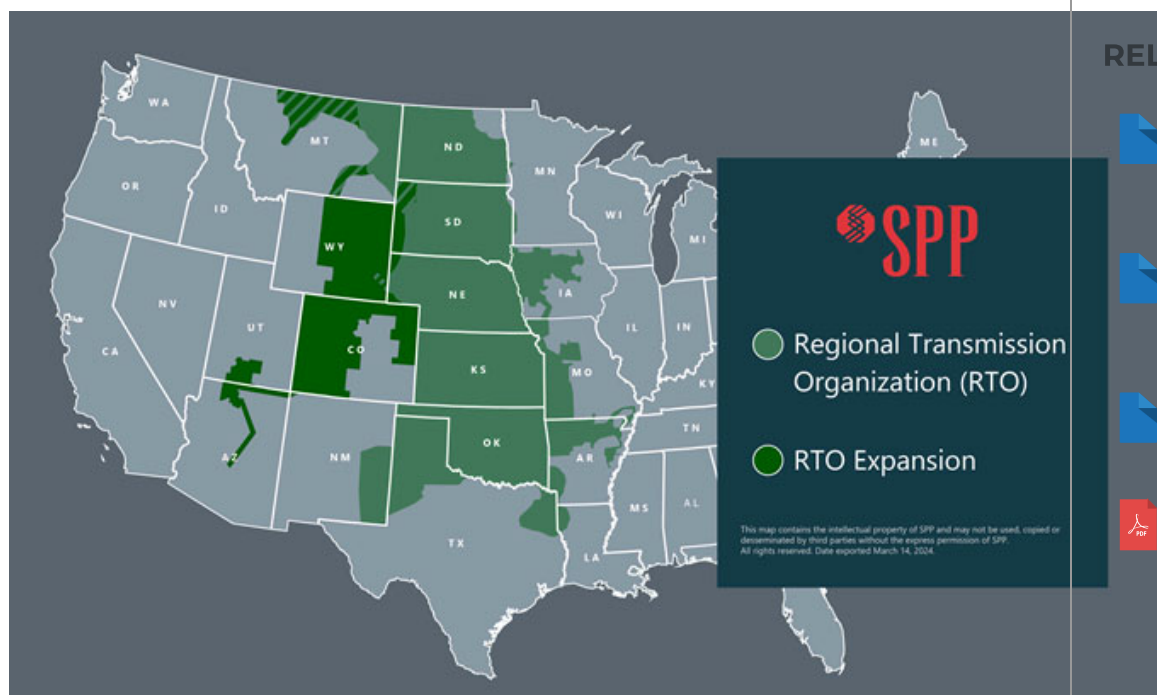
Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 2-180
SPP RTO Expansion

RTO EXPANSION

In July 2021, Southwest Power Pool’s board of directors and Strategic Planning Committee approved the submitted policy-level terms and conditions for regional transmission organization (RTO) expansion in the Western Interconnection during its quarterly joint stakeholder meeting July 27. (Read more in the [July 27, 2021, press release](#) about the board's approval of RTO west terms and conditions.)

In November 2020, SPP announced that several utilities would evaluate the benefits of placing western facilities under the terms and conditions of SPP’s Open Access Transmission Tariff. An SPP Brattle study found that the move would be mutually beneficial and produce \$49 million a year in savings. Additionally, SPP anticipates its wholesale electricity market, resource adequacy program and other regionalized services can help western members achieve renewable-energy goals, reinforce system reliability and leverage new opportunities to buy, sell and trade power. (Read more in the [Nov. 12, 2020, press release about the potential benefits of the expansion of the SPP RTO to the west.](#))



If they pursue membership, the following organizations would become the first members of SPP’s RTO to place facilities in the Western Interconnection under the

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Western RC Services	>
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RELATED DOCUMENTS

- [Resource Adequacy - Study Data Request for RTOW New Participant](#)
- [Resource Adequacy - Non NERC GADS Resources Outage Data Submission Form RTOW](#)
- [RTO West Resource Adequacy Data Request Instruction Manual](#)
- [2024-2026 SPP RTOE Coordination Agreement Development Strategy and Roadmap](#)

RELATED DOCUMENT GROUPS

- [RTO Western Expansion Program](#)

terms and conditions of SPP's tariff:

- Basin Electric Power Cooperative
- **Colorado Springs Utilities (CSU)**
- Deseret Power Electric Cooperative
- Municipal Energy Agency of Nebraska (MEAN)
- **Platte River Power Authority (PRPA)**
- Tri-State Generation and Transmission Association
- Western Area Power Administration (WAPA)*

** WAPA's evaluation of RTO membership will consider the participation of its Upper Great Plains-West (UGP-West) region, Colorado River Storage Project and Rocky Mountain region.*

This would extend the reach and value of SPP's services — including day-ahead wholesale electricity market administration, transmission planning, reliability coordination, resource adequacy and more — and the synergies they provide when bundled under the RTO structure.

The SPP Brattle study found that the organization's membership in the SPP RTO would produce approximately \$49 million in savings annually for SPP's current and new members. The western utilities joining SPP would receive \$25 million a year in adjusted production cost savings and revenue from off-system sales, and SPP's members in the east would benefit from \$24 million in savings resulting from the expansion of SPP's market, transmission network and generation fleet. SPP's prior calculations of the value of RTO membership suggest that these benefits are only a portion of those current and new members will derive. There is additional value not considered by the Brattle study in five-minute real-time economic dispatch, achievement of public policy goals, lowered reserve-margin requirements, consolidation and regionalization of planning and other processes and more.

Basin Electric, MEAN, Tri-State and WAPA's UGP-East Region are already members of SPP, having joined the RTO in 2015 when they placed their respective facilities in the Eastern Interconnection under SPP's tariff. Along with Deseret, each is also a customer of at least one of SPP's contract-based Western Energy Services, which includes reliability coordination and a real-time market scheduled to launch in February 2021. The companies' letters indicate they will now work with SPP to evaluate the terms, costs and benefits of putting western facilities under the RTO's tariff.

SPP's New Member Integration Process

SPP's Strategic Planning Committee will oversee a five-stage New Member Integration Process designed to provide transparency during SPP's negotiations with prospective new members.

1. The Initial Discussion phase occurred when the interested western utilities asked SPP to provide information about SPP and its interest in providing RTO membership services in the Western Interconnection.
2. The Due Diligence and Membership Agreement Discussions phase was initiated in Nov. 2020 when prospective members publicly announced their intent to evaluate membership. This initiates negotiations regarding any potential changes to SPP's governing documents required to accommodate new members' integration into the RTO. At this point in the process, SPP establishes a Members Forum and State Commission Forum which give guidance and assist SPP in performing its due diligence. Participation in these forums may require execution of a confidentiality agreement.
3. The Tariff and Governing Document Changes Phase occurs when prospective transmission owning members decide to announce results of discussions with SPP publicly. This is considered the second triggering event in the communication process. SPP staff will convene special all-member and stakeholder meetings to present proposed membership terms and analyses conducted.
4. As appropriate, SPP will then seek the necessary FERC and state approvals.
5. Finally, the Integration phase occurs when the new members officially join the SPP RTO.

To follow the progression of this process, you may register for meetings or download materials of the [Members Forum](#) or [State Commission Forum](#).

RTO Expansion Stakeholder Training

Explore RTO Expansion stakeholder training offerings [here](#).

Western Stakeholder Groups



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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-181
Department Press Release on March Centralia Order



[Energy.gov](#) > [Trump Administration Keeps Coal Plant Open to Ensure Affordable, Reliable and Secure Power in the Northwest](#)

Trump Administration Keeps Coal Plant Open to Ensure Affordable, Reliable and Secure Power in the Northwest

U.S. Secretary of Energy Chris Wright today issued an emergency order to ensure Americans in the Northwestern region of the United States have access to affordable, reliable and secure electricity.

[Energy.gov](#)

March 16, 2026

 2 min

Emergency order addresses critical grid reliability issues, lowering risk of blackouts and ensuring affordable electricity access.

WASHINGTON—U.S. Secretary of Energy Chris Wright today [issued](#) an emergency order to ensure Americans in the Northwestern region of the United States have access to affordable, reliable and secure electricity. The order directs TransAlta to keep Unit 2 of the Centralia Generating Station in Centralia, Washington available to operate. Unit 2 of the coal plant was scheduled to shut down at the end of 2025. The reliable supply of power from the Centralia plant is essential to maintaining grid stability across the Northwest, and this order ensures that the region avoids unnecessary blackout risks and costs.

“The last administration’s energy subtraction policies had the United States on track to likely experience significantly more blackouts in the coming years — thankfully, President Trump won’t let that happen,” **said Energy Secretary Wright**. “The Trump administration will continue taking action to keep America’s coal plants running so we can stop the price spikes and ensure we don’t

lose critical generation sources. Americans deserve access to affordable, reliable, and secure energy to power their homes all the time, regardless of whether the wind is blowing or the sun is shining.”

Thanks to President Trump’s leadership, coal plants across the country are reversing plans to shut down. On December 16, 2025, Secretary Wright [issued](#) an emergency order directing TransAlta to keep Unit 2 (729.9 MW) available to operate.

According to DOE’s [Resource Adequacy Report](#), blackouts were on track to potentially increase 100 times by 2030 if the U.S. continued to take reliable power offline as it did during the Biden administration.

This order is in effect beginning on March 17, 2026, through June 14, 2026.

###

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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
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PacifiCorp, and Xcel Energy)

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

Exhibit 2-182
Grid Strategies Analysis of NERC LTRA



Review of NERC's 2025 Long-Term Reliability Assessment

Adria E. Brooks, Michael Goggin, John D. Wilson

March 5, 2026

Prepared for Earthjustice, Natural Resource Defense Council, Sierra Club, and Environmental Defense Fund

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Executive Summary

The NERC LTRA assesses future regional resource adequacy risk. Re-assessment using a more complete accounting of generation, imports, and demand from other data sources results in lower risk.

Overall, the LTRA resource margins are much tighter than what may occur for four reasons.

First, the LTRA underestimates likely-to-connect power resources. Power resources in advanced development stages are projected to provide enough capacity to resolve the majority of shortfalls identified in the LTRA.

Second, the most significant risk to resource adequacy shortfalls are delays to generator interconnection. Actions that delay interconnection study, permitting, and/or construction for generation facilities increase the likelihood of shortfalls.

Third, the LTRA underestimates imports from one region to another. At levels seen historically during extreme events, these are sufficient to further alleviate resource inadequacy.

Furthermore, additional interregional transmission would lessen shortfall risk. The NERC-identified interregional transfer capability additions would help resolve many of the identified seasonal capacity and energy shortfalls.

Fourth, data centers may require significantly less power than expected. Combined with the other three corrections, this scenario could allow all regions to meet 2030 peak summer load and reserve needs.

With a clearer vision of the future and rapid action, the grid could be even more reliable in five years than it is today.

NERC's 2025 Long-Term Reliability Assessment is too pessimistic. This analysis explores three major categories of input assumptions that impact the regional risks NERC identified.

North American Electric Reliability Corporation (NERC)'s Long-Term Reliability Assessment (LTRA) importantly captures potential reliability issues for a snapshot in time. NERC relies on utility-reported input data in making its assessments. This data, by definition, does not account for national power sector trends or limitations—such as double-counting of prospective demand or generation—that can have large impacts on future risk.

In this analysis we compare NERC's input data and assumptions against other sources to explore how changes to inputs impact the severity of risk identified in the LTRA. We explore three categories of inputs: demand, generation resources, and interregional transmission.

As the LTRA highlights, reserve margins—the difference between electricity demand and available supply—are tightening across the country. We find that while these margins are tightening, the severity of that risk is likely less than reported in the LTRA.

Three major factors:



**Generation
Resources**



**Interregional
Transmission**



**Demand for
electricity**

NERC's 2025 LTRA highlights important reliability concerns, but the severity of these concerns depends on the data used.

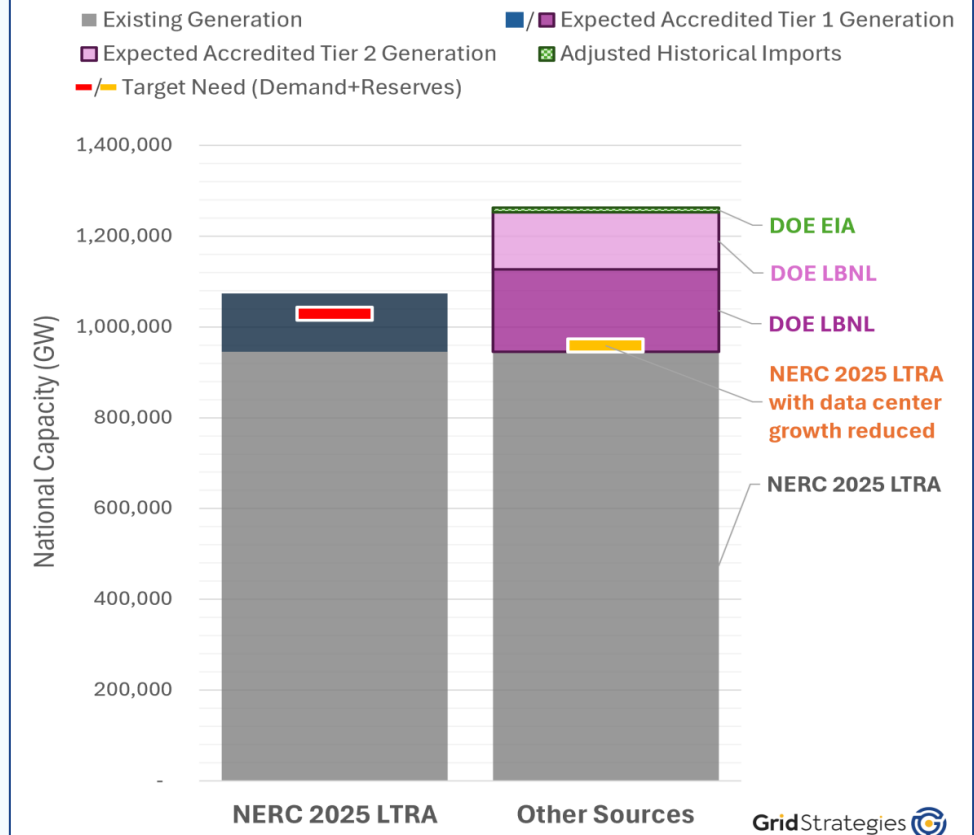
A reassessment of the LTRA regional seasonal adequacy using a more complete accounting of generation, imports, and demand from other data sources reveals different—and in many cases less dire—risk assessments for some regions.

- The LTRA generation forecast is based on an incomplete accounting of nearly built generation projects. A more reasonable expectation for generation growth can be determined from each region's interconnection queue.
- The LTRA import forecast excludes the opportunity for increased imports from new interregional transfer capability.
- The LTRA demand forecast is supplied by utilities and regional planners. The vast majority of the load growth in the LTRA forecast is based on utility large load forecasts. Some of this load is uncommitted and may not materialize or it may curtail during peak periods.

The combination of low generation, low import, and high demand assumptions used in the 2025 LTRA resulted in resource margins appearing tighter than may actually materialize.

A comparison of the aggregated resource margins from NERC's LTRA and other national, reputable data sources, which account for the above three factors, is shown to the right. This chart is explained in the Methodology.

Will there be enough capacity to meet 2030 summer needs?
NERC's 2025 LTRA compared against other data sources.



Implementing currently available solutions will help all regions alleviate the identified capacity and energy risks.



Resource supply is available to meet rising needs but is encountering roadblocks. Potential solutions include:

- More efficient interconnection queues for all resources
- Permitting certainty and reduced construction delays for needed grid infrastructure
- Adopting reforms to increase coordination between transmission planning and generator interconnection



Additional import capability would help alleviate tight reserve margins. Potential solutions include:

- Appropriately valuing the resource adequacy (capacity) contribution of interregional transmission
- Comprehensive transmission planning processes that consider both firm and non-firm imports
- Acting on NERC's recommended interregional transfer capability additions



Tightening reserve margins are driven primarily by demand growth from large source loads, such as data centers. Potential solutions include:

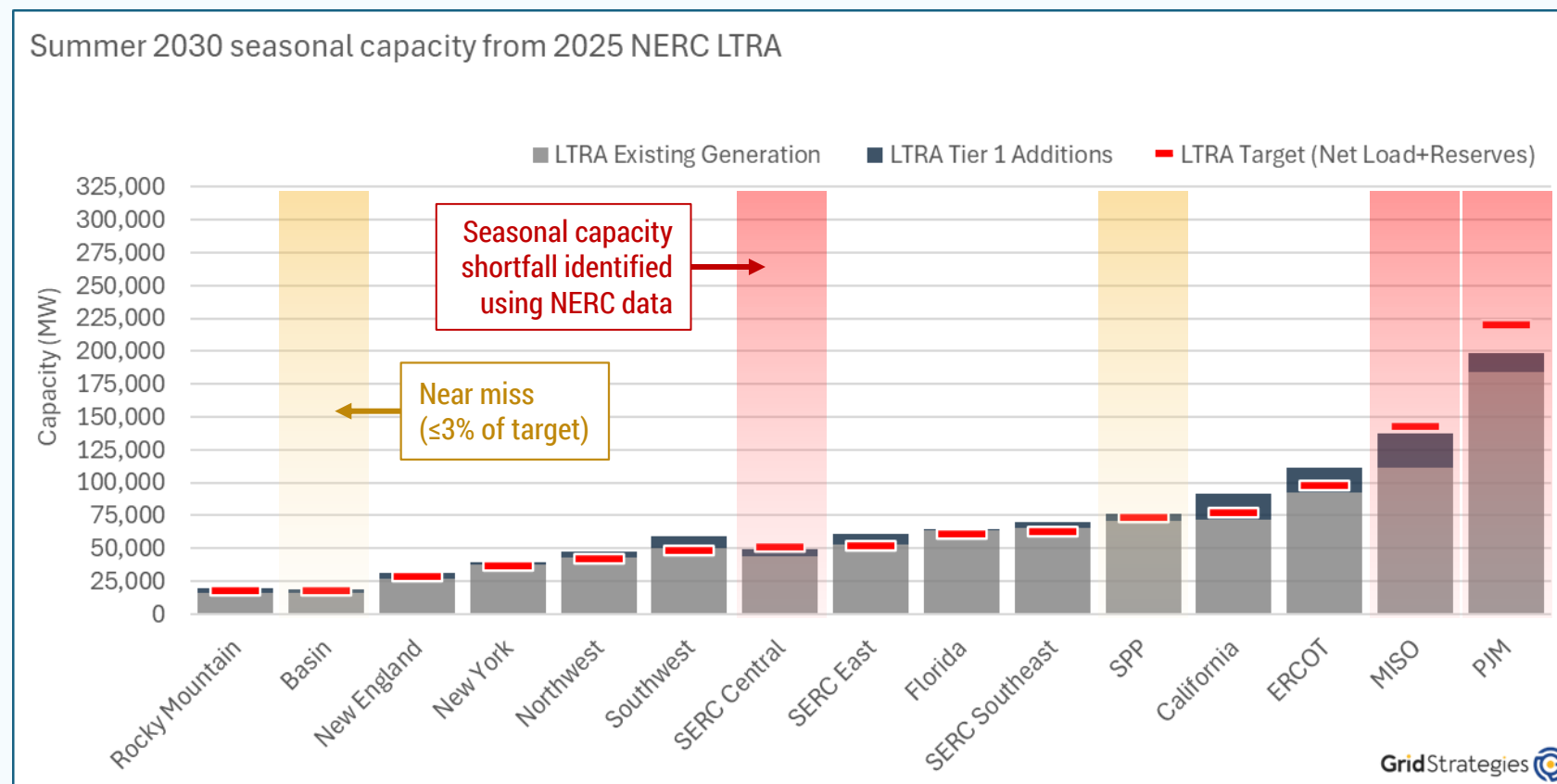
- Reducing the uncertainty and lack of transparency in load forecasts
- Regulatory solutions to connect large loads reliably

Generation Resource Assumptions

NERC only considered resources with executed interconnection agreements when determining shortfall risk.

All resources must undergo interconnection studies to identify any grid upgrades that may be necessary to reliably connect. At the end of the interconnection queue process, an interconnection agreement (IA) is executed. NERC considers any resource that has an executed IA as **Tier 1**.

To be resource adequate, a region must have enough future capacity and imports to meet load and reserve margins (“target”). NERC only counts Tier 1 resources toward future resources in the LTRA. NERC identifies three regions* that may be short of 2030 summer capacity needs using its assumptions. Two regions only exceed their target by less than 3%, marked here as “near miss” regions.

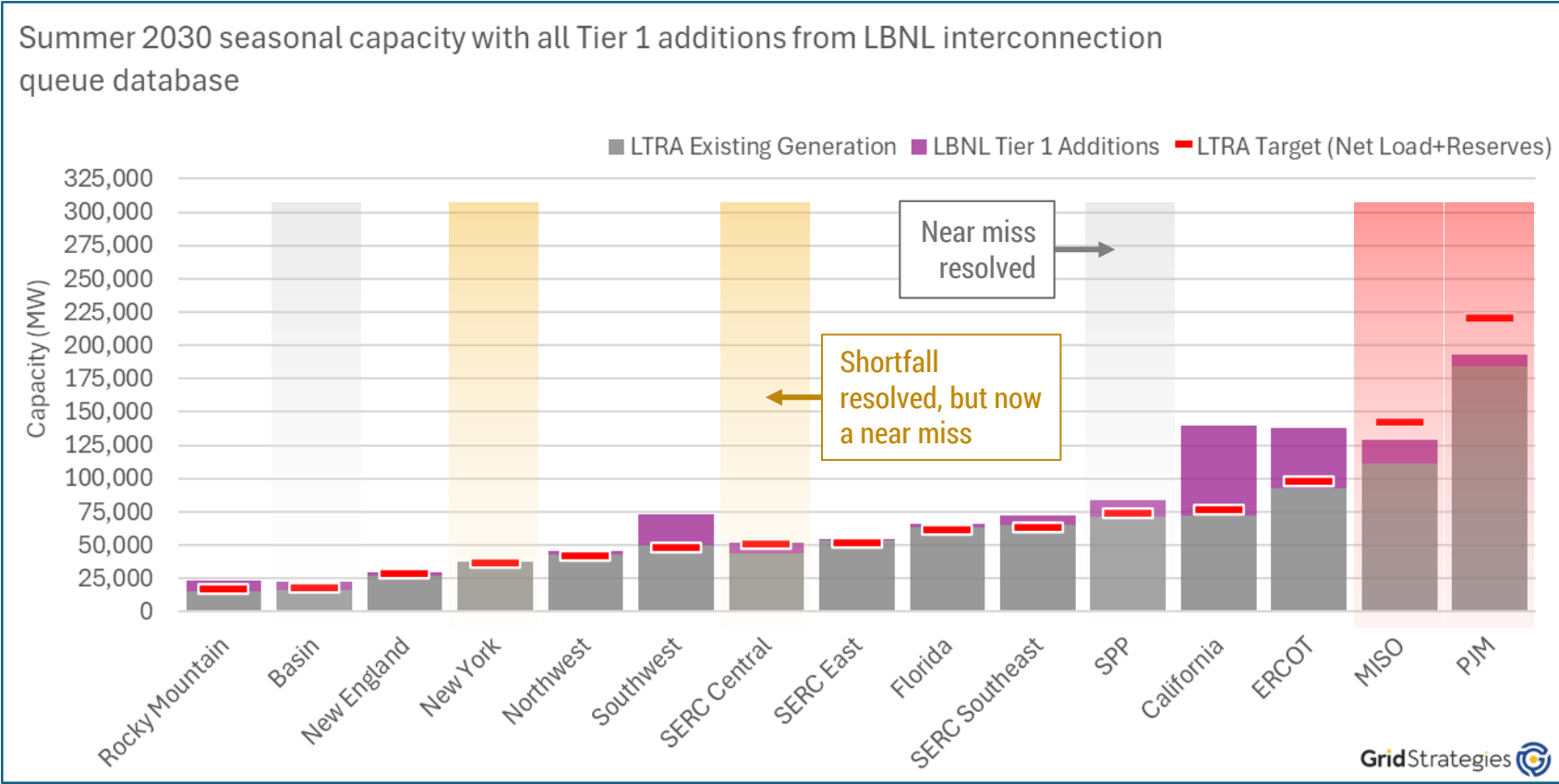


*NERC did not identify SERC Central as a heightened risk region though it is shown to be short of future capacity using the LTRA source data, perhaps because they did not identify elevated energy inadequacy risk despite the seasonal capacity shortfall in the region. We highlight it as elevated risk given the identified seasonal capacity shortfall.

The amount of resource capacity with executed interconnection agreements in the LTRA is lower than that compiled by LBNL.

The U.S. Department of Energy (DOE)’s Lawrence Berkley National Laboratory (LBNL) tracks interconnection queue data across all regions and is a reputable source of high-quality data. The LBNL data suggests more accredited **Tier 1** resource capacity is available nationwide than is recorded in the LTRA, though regional allocations vary. The mismatch in data could be due to different processing methods, collection periods, and, importantly, resource accreditation methods.*

Using the LBNL data paints a different future risk picture than the LTRA—only two regions show 2030 summer shortfalls. This highlights how sensitive risk assessments are to their input data.



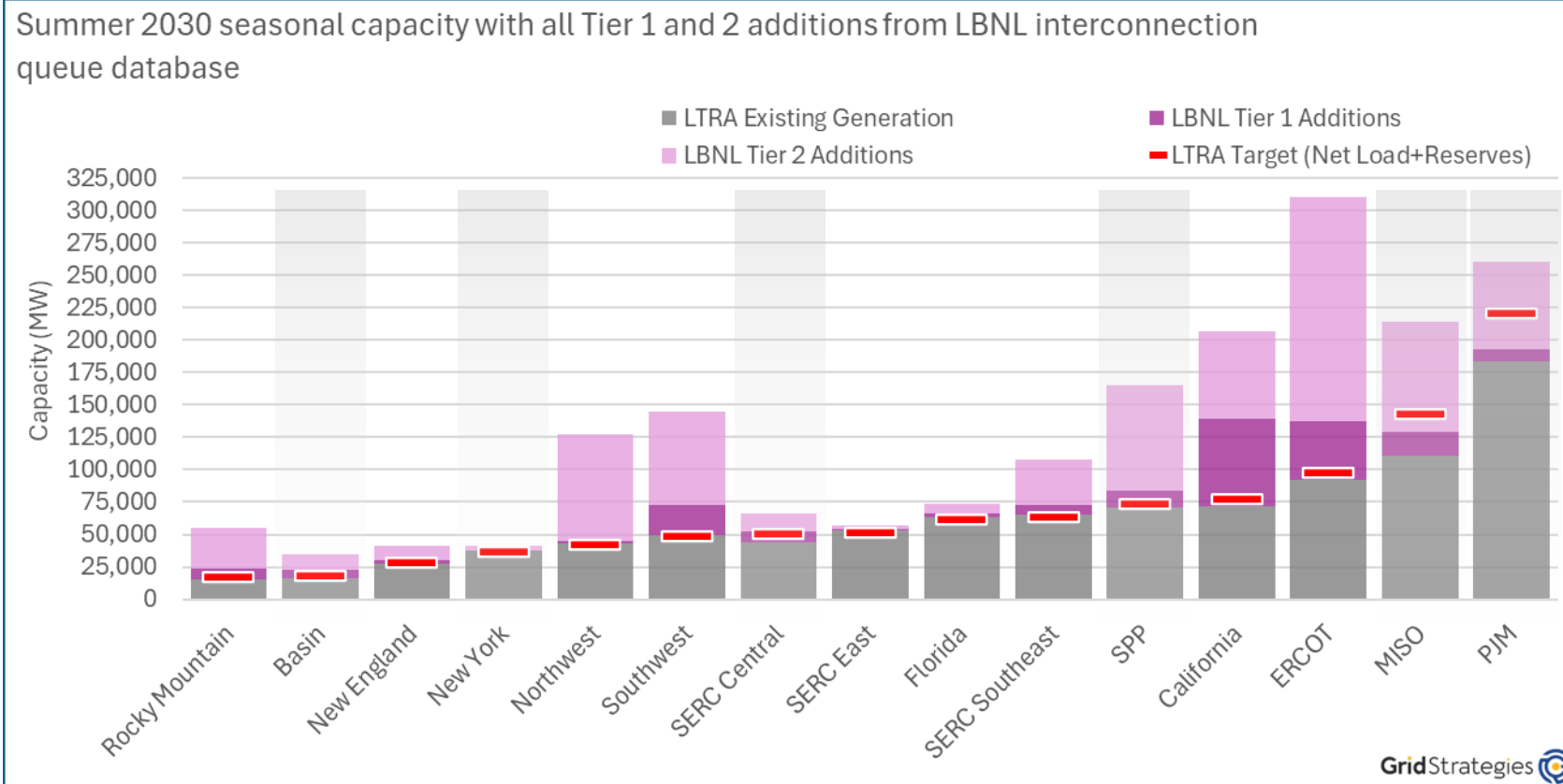
*All LBNL generation capacity used in this analysis has been discounted using regional, seasonal, and resource-specific accreditation methods, to show the expected generation capacity during peak load. Utilities do not uniformly report seasonal or resource-specific accredited capacity to NERC for use in the LTRA, which, as NERC highlights, may inaccurately account for the capacity availability during peak load (LTRA at 9, 44, 60, 71, 76, 122). See the Methodology for more information.

There are more resources under development in each region than those with executed IAs. Providing a path to interconnection for these resources helps alleviate risk.

NERC considers any resource that has begun system studies, but has not yet completed them, to be a **Tier 2** resource. According to LBNL data, there is nearly five times the accredited Tier 2 resource capacity with planned in-service dates by 2030 nationwide than NERC-counted Tier 1 as well as three times the NERC-counted Tier 2 summer 2030 resource capacity.

NERC does not include any Tier 2 capacity in the LTRA shortfall analysis. Inclusion of this capacity suggests that regions could be at less risk of seasonal shortfalls than illustrated in the LTRA.

But this is only true if there are clear pathways for interconnection of these resources. LBNL research shows that generators are facing increasing delays in the interconnection study and post-study phases. These delays contribute to project cancellations, which is dangerous for seasonal resource adequacy.

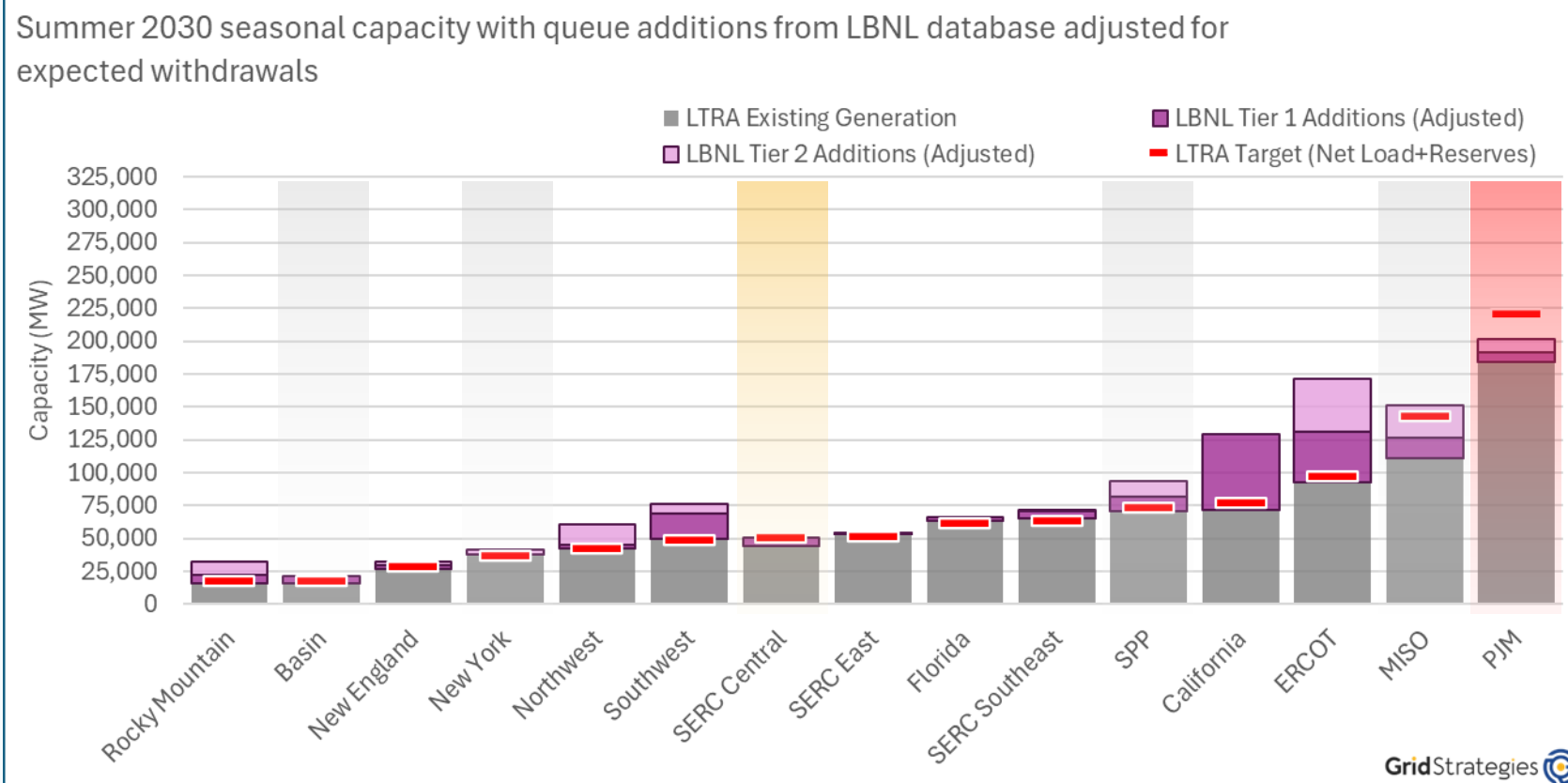


Even when accounting for likely resource cancellations in the queue and post-queue phases, LBNL data suggests enough resources could connect to meet most regions' 2030 capacity needs.

It is unlikely that all Tier 1 and Tier 2 resources will connect to the grid. LBNL analysis shows as much as 85% of resources that enter the queues fails to connect to the grid (“withdrawal rates”), including facilities with executed IAs.

Rather than omit all Tier 2 data to account for the risk of cancellations (as done in the LTRA), we apply historic region-specific and phase-specific withdrawal rates to the LBNL data to estimate how much may connect to the grid by 2030.

Consideration of likely-to-connect resources currently in the interconnection queues resolves the majority of identified seasonal adequacy shortfalls. The resolution of shortfalls shown here is accomplished without a delay to announced resource retirements.

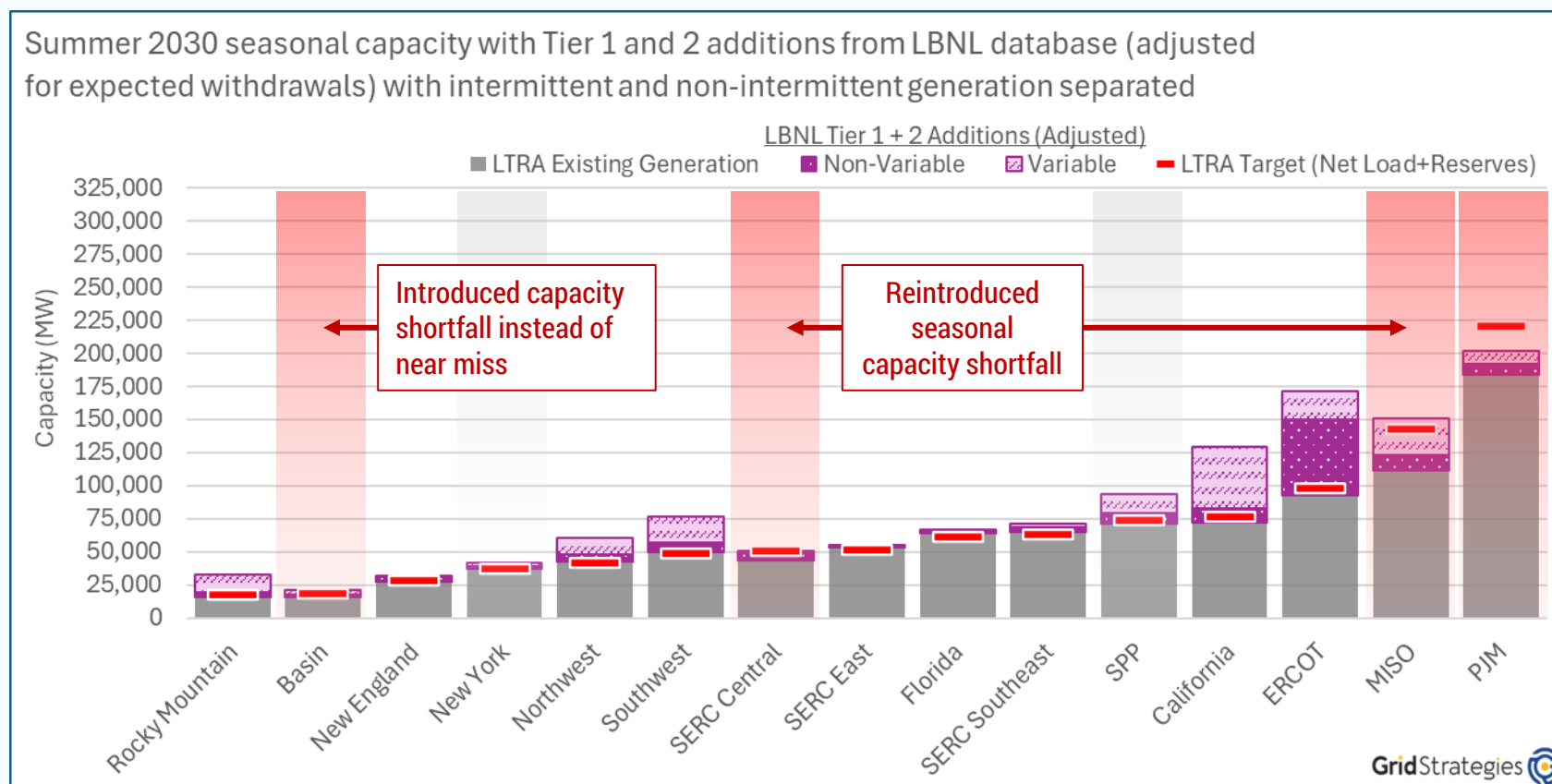


Delays in the study, permitting, and/or construction phases to resources already in the queues—including wind and solar facilities—could jeopardize meeting regional seasonal capacity needs.

Additional permitting or equipment procurement steps applied to facilities increases their time to interconnection or results in project cancellation outright. Unnecessary hurdles for facilities waiting to interconnect could jeopardize huge amounts of resource capacity in advanced stages of development.

Shown here is the amount of likely-to-connect Tier 1 and 2 resource capacity from the LBNL data, broken out into variable (wind and solar) and non-variable resources.

Actions which delay permitting or construction for variable generation facilities could prevent large portions of the Midwestern, Southeastern, and Western regions from maintaining resource adequacy where they otherwise would be able to.



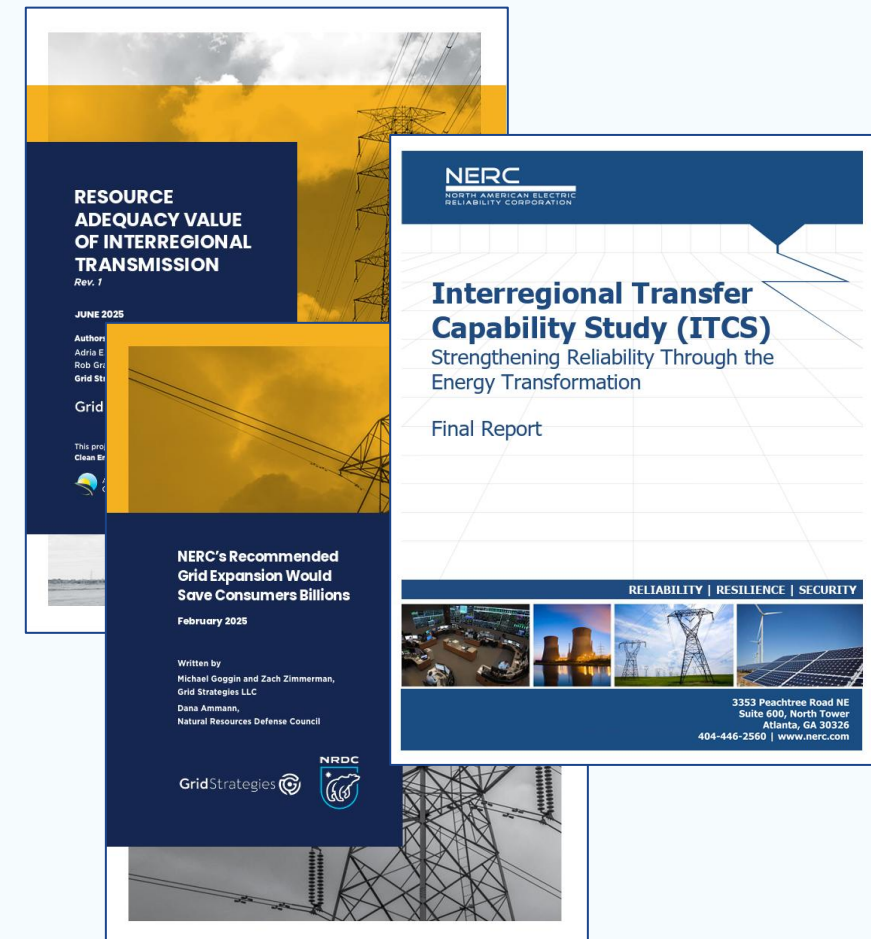
Interregional Transmission Assumptions

Interregional transmission helps to alleviate capacity adequacy concerns, especially during times of grid stress.

One of the many benefits of interregional transmission is the ability to move power between regions during times of grid stress. The availability of imports is primarily due to net load diversity among regions due to timing differences in peak demand and generation unavailability, particularly during severe weather events. Weather patterns and extreme grid events do not impact all regions equally, so there is often spare capacity in a neighboring region that could be shared during times of need. As a result, this benefit will largely persist even if reserve margins in neighboring regions are lower going forward. This phenomenon is well documented in several studies.

The LTRA only includes firm interregional capacity transfers in assessing anticipated reserve margins, which NERC defines as transfers with firm contracts. This ignores the historical role of “non-firm” imports, which are available during extreme events. For example, MISO imported over 13 GW during Winter Storm Uri, of which 5 GW was in turn exported to SPP, imports that literally kept the lights on in those regions.

Sharing of power can only occur, of course, if enough interregional transmission exists to move the available power. NERC acknowledged this in their 2024 Interregional Transfer Capability Study (ITCS) where they measured the amount of interregional transmission capacity that should be added to each region to help support energy adequacy. The ITCS analysis looks at peak grid stress days for each region and determines if excess capacity is likely to be available in neighboring regions during those same hours. It then suggests interregional transmission capacity be added to move that excess generation.



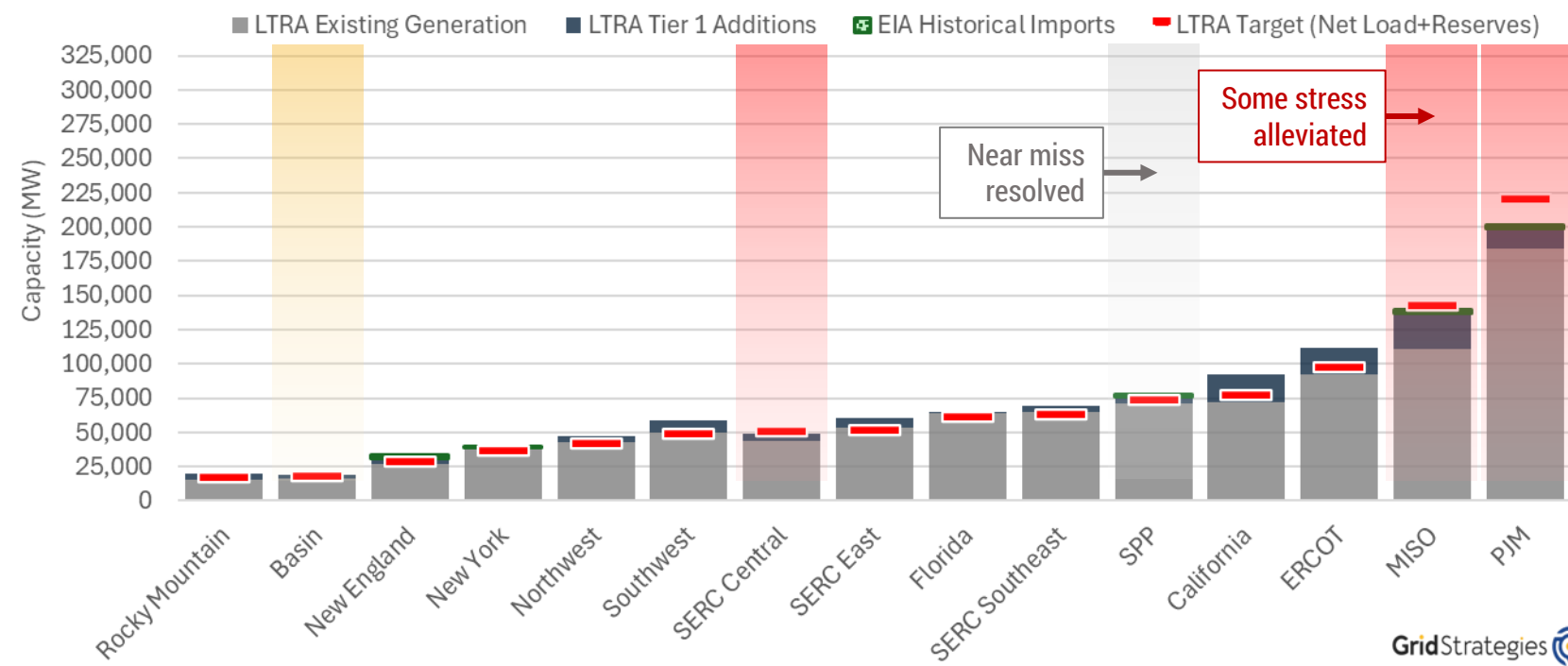
The LTRA only counts firm imports, omitting non-firm imports. Some regional stress is alleviated when combining the LTRA capacity assumptions with historical non-firm import availability.

The LTRA only includes firm interregional capacity transfers in assessing anticipated reserve margins, which NERC defines as transfers with firm contracts. This ignores non-firm imports over interregional transmission lines that have been available during historical grid stress events.

Hourly regional import and export data collected by the U.S. Energy Information Administration (EIA) confirm regions import significantly more during periods of peak demand than the LTRA assumes.

The inclusion of non-firm imports that are historically available during extreme events helps further alleviate resource inadequacy.

Summer 2030 seasonal capacity with interregional import capacity adjusted to reflect regional historical imports

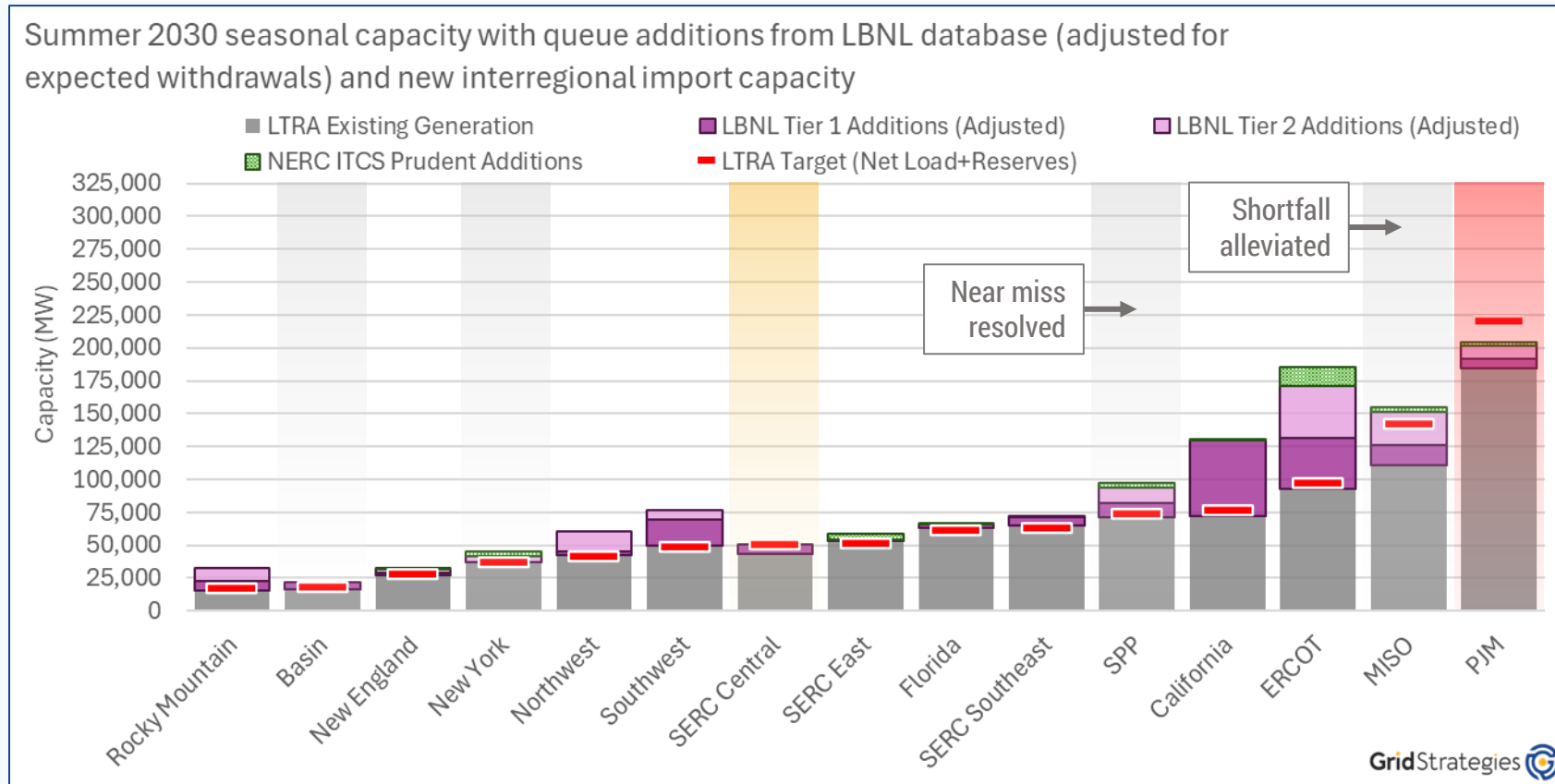


The combination of NERC-identified increased transfer capability and reasonable resource assumptions from the interconnection queues provides even more security to avoid shortfalls.

The combination of interregional transmission additions suggested by NERC's ITCS and reasonable generation additions using LBNL queue data would provide regions with additional capacity to weather seasonal grid stress events.

The addition of new NERC-identified transfer capability would likely resolve many of the identified seasonal capacity and energy shortfalls.

All transmission takes a long time to develop, but this is especially true for interregional transmission. Unfortunately, the NERC-identified interregional transfer capability additions are unlikely to be built by 2030 under the status quo. Legislative and regulatory action taken now could accelerate the construction of these prudent additions.



Demand Assumptions

The load growth in the LTRA is based on utility projections that, in some cases, are based on overstated assumptions.

NERC compiled the LTRA load growth forecast by rolling up projections from utilities and regional grid operators. Large load forecasts are uncertain and could overstate load growth for several reasons.

Reliance on customer data: Large load forecasts rely primarily on customer-supplied information.

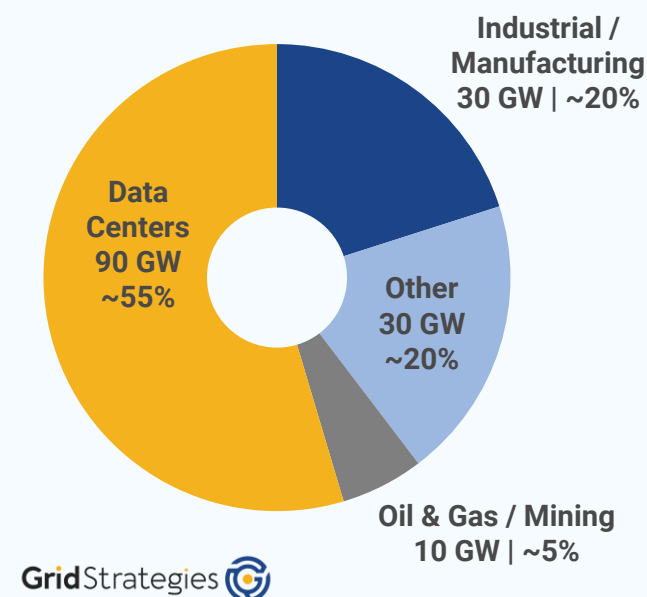
- Data centers, in particular, are constrained by global supply chains. There is no clear method for individual load forecasts to account for how supply chain constraints will affect specific projects.
- Load forecasts lack visibility into customers' overall business plans. There may be "double counting" as data center operators develop more sites as options than they intend to build. The LTRA includes all loads with "development commitments necessary to drive grid planning studies." In contrast, the LTRA only counts generators that have completed all planning studies and signed an interconnection agreement.
- Many regulated utilities have an incentive to overstate load growth and interconnection success rates to justify additional rate-based investments in generation and other infrastructure.

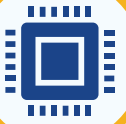
Time lags: Producing and compiling load growth projections occurs months before the LTRA is released. Mounting delays in large load interconnection and policy changes appear to have slowed load growth since their compilation.

- Load interconnection queue backlogs and long lead times for power transformers and circuit breakers needed for interconnection are likely to delay commercial operation of many large load projects.
- As outlined in the following slides, new large loads from data centers, cryptocurrency mining, and hydrogen electrolysis could each face headwinds that are not fully accounted for in the LTRA.
- Recent policy changes are reducing load growth, such as the recent termination or restriction of federal tax credits for electric vehicles, heat pumps, hydrogen electrolysis, and advanced manufacturing.

Load flexibility: Regulations and utility tariffs are beginning to require some large loads to provide demand response or backup generation during periods of peak demand. ERCOT's load forecast includes substantial demand response for crypto mining facilities and assumes that new requirements for large load emergency curtailment would reduce peak demand growth by 84%.

**Drivers of Load Growth
(2025 – 2030)**



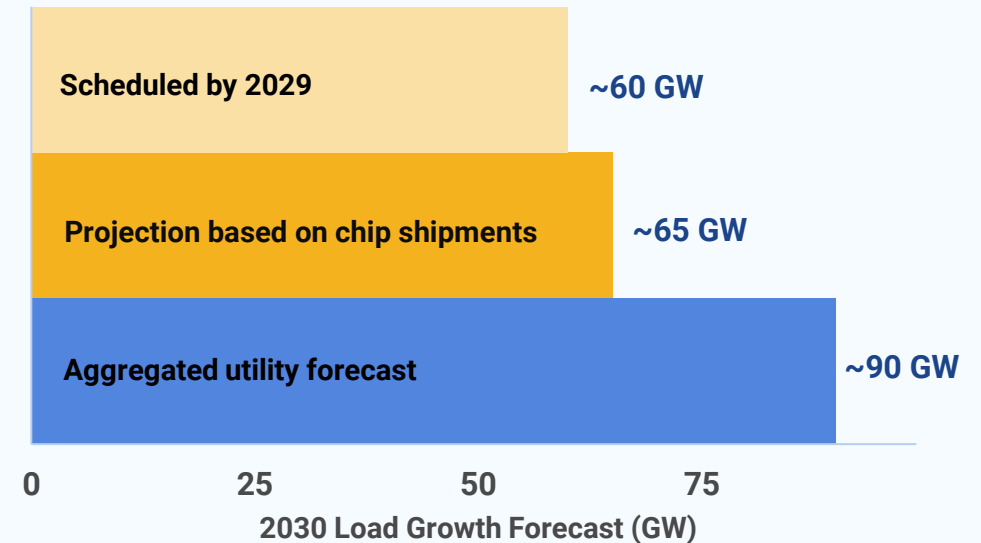


Assumed data center load

The LTRA reasonably states that, “New data centers for artificial intelligence and the digital economy account for most of the projected increase in North American electricity demand over the next 10 years.” However, the growth of data centers and their contribution to peak demand may be overstated due to:

- **Supply chain shortages of chips and other key inputs.** TD Cowen estimated that due to chip limitations, U.S. data center growth would be limited to 65 GW (orange bar), about two-thirds of the data center growth assumed for the U.S. alone in the LTRA (blue).
- **Financial constraints.** Wall Street analysts have expressed concerns that expected revenues are insufficient to sustain the overall industry trajectory for AI data center investment.
- **Load flexibility.** Data centers may be able to use local generation and storage resources to reduce or eliminate their on-peak demand for grid power. Additionally, some types of data centers may opt to curtail their demand during peak periods without local supply. Curtailment activities such as these are unlikely to appear in utility forecasts of expected load. These practices may drive up annual energy use.

Alternative Benchmarks for Data Center Load Growth



GridStrategies



Assumed cryptocurrency mining load

Cryptocurrency mining accounts for about 7 GW or 15% of ERCOT's projected large load growth through 2030, though it is likely lower in other regions.

However, cryptocurrency mining data centers are understood to be more speculative than other data center types. Cryptocurrency mining facilities are highly modular and can be readily moved to different sites, even after they have been installed and put into service at a site. Unlike some types of data centers, they do not face major siting constraints due to concerns about latency or access to fiber networks. These factors increase the likelihood of “double counting.”

In ERCOT, cryptocurrency mines routinely use demand response or price-sensitive demand bids to curtail demand during peak periods. If properly incentivized to do so, their contribution to peak demand can be reduced or eliminated.



Assumed Hydrogen Electrolyzer Load

Most hydrogen production load is forecast in ERCOT, where planned electrolyzers account for about 8-9 GW or 20% of ERCOT's projected large load growth through 2030. NYISO's load forecast used to include substantial hydrogen production, but it has been adjusted downward. Only a few other load forecasts mention hydrogen production, and at much lower volumes than in ERCOT. According to EIA data, the U.S. had only 116 MW of hydrogen electrolyzers in operation in 2024.

ERCOT's forecast may not reflect a full market response to congressional action to tighten the timeframe for projects to qualify for the Section 45V Clean Hydrogen Production Credit. The credit is now only available for facilities that begin construction by the end of 2027 instead of 2032.

The operation of planned electrolyzers is also difficult to forecast, but they are unlikely to fully contribute to peak load for two reasons:

- The tax credit depends on the carbon-intensity of electricity consumption. This will drive electrolyzers operation to hours with high renewable generation, which are unlikely to be periods of peak net load.
- Regardless of the tax credit, electrolyzers will tend not to operate on-peak because the electricity would be too expensive.

Load flexibility can reduce the capacity needed for large loads

Nearly all the preceding categories of large loads can use demand response, on-site generation and storage, or price-responsive loads to reduce or eliminate their contribution to peak demand.

The LTRA assessment of ERCOT's planning reserve margin assumes that new requirements for large load emergency curtailment would reduce peak demand growth by 84%. Through 2035, as load grows by 59 GW, demand response grows by 50 GW. NERC states that it made this assumption because "signed into law in June 2025, Texas Senate Bill 6 directs the Public Utility Commission of Texas to establish uniform large-load interconnection standards that, among other things, provide ERCOT with new large-load curtailment management tools and ERCOT's authority to direct (or require transmission service providers to direct) large loads to curtail their load prior to and during declared energy emergency situations."

While there is considerable debate about the feasibility for some types of data centers to provide flexibility, ERCOT's requirement shows the potential impact on resource adequacy. Nonetheless, no other load forecasts used to inform the LTRA include similar load flexibility assumptions. As a result, a large share of the projected load growth in the LTRA for other regions could be negated if NERC likewise assumed, as it did for ERCOT, that large loads use some type of flexibility during peak periods. Large loads in these regions could use similar flexibility solutions. For example, Google has signed agreements with utilities to use flexibility to reduce peak load contributions from data centers in Indiana, Nebraska, Arkansas, and the Tennessee Valley Authority footprint (Google 2025).

A recent study estimates 30% of data centers may install flexible capability anyway to curtail during localized transmission system overload or contingency events, as a way to move to the front of lengthy interconnection backlogs by reducing the need for cost- and time-intensive grid upgrades (Thomas 2026). Data centers that are unable to curtail could use behind-the-meter resources during peak periods to reduce or eliminate their reliance on grid power.

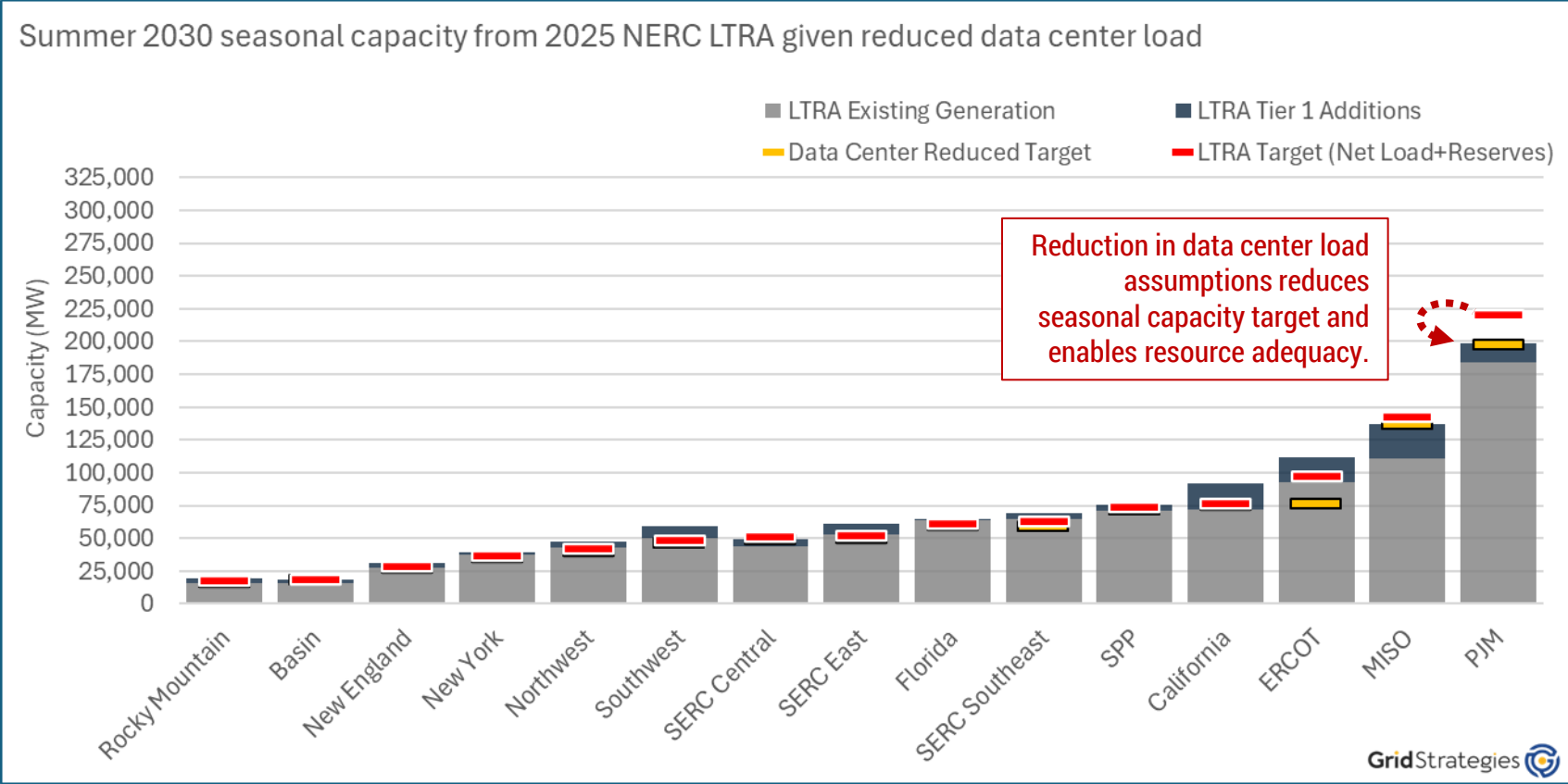
Updating data center load forecasts based on chip-industry forecasts would allow nearly all regions to meet their 2030 target needs

NERC indicates that load growth in several regions is dominated by data centers. To highlight the impacts of uncertainty in data center growth projections in the LTRA, we introduce a scenario which reduces national 2030 data center growth by two-thirds. This reduction is distributed among the regions based on their individual forecasted data center load and is shown as a yellow target in the chart.

A one-third reduction is based on chip industry forecasts and an additional one-third is based on assumed use of on-site generation during peak demand.

Consideration of potential reductions in data center load growth enables all regions to meet their 2030 peak summer load and reserve needs.

Note: If no red target is visible, then the two targets appear to overlap. All regions' net load was reduced.



Extreme Event Energy Adequacy

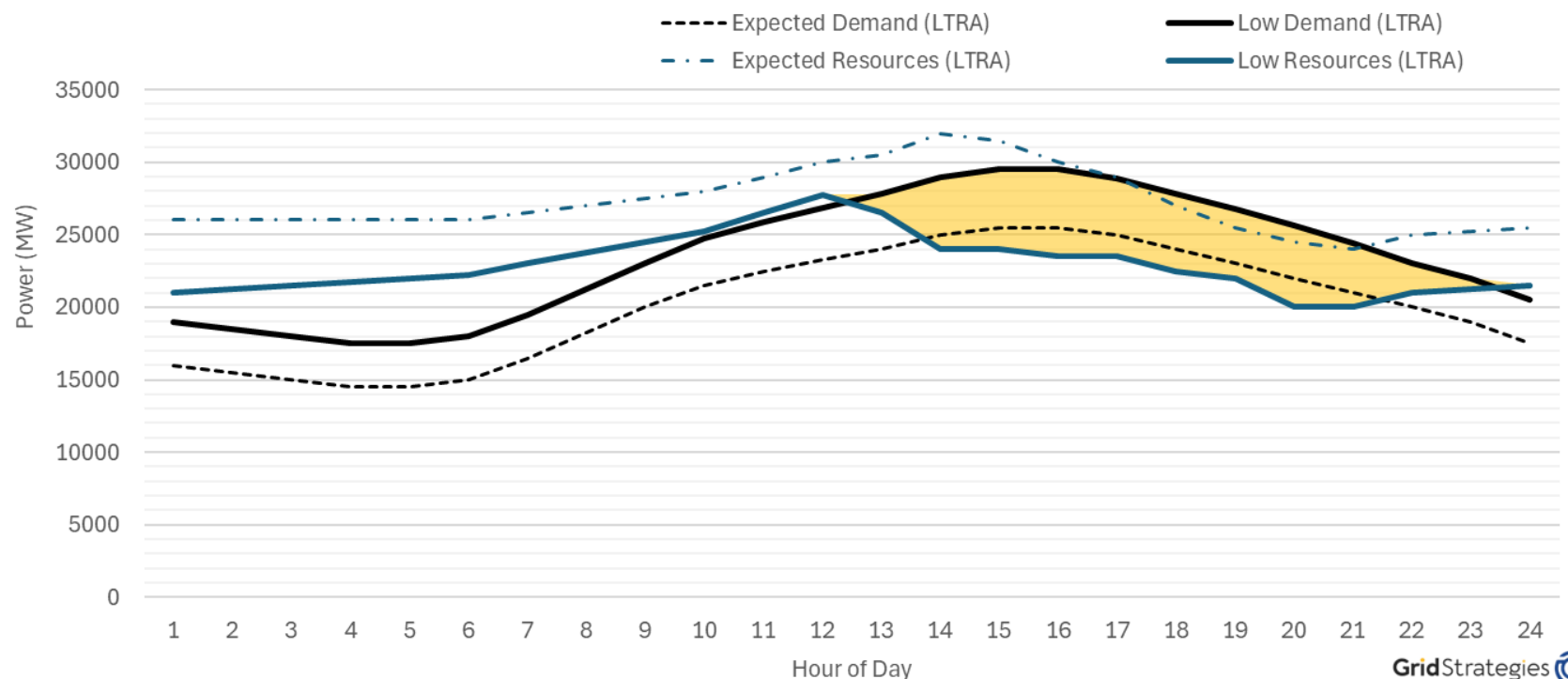
Energy inadequacy risk during extreme events can exist even without seasonal capacity shortfalls. An increase in resource and interregional transfer capability also helps to alleviate extreme event risk.

The risk of energy shortfalls during extreme grid events can exist even without there being a risk of capacity shortfalls when considering only seasonal peak load. It is important to study both capacity and energy adequacy.

For example, NERC found energy shortfalls could occur during extreme heat days in New England,* even though it did not find seasonal capacity shortfalls.

Expected resource production is enough to meet expected demand (dotted lines) on most days, but sensitivity testing shows that the combination of lower-than-expected resources and high demand (solid lines) could result in energy shortfalls (yellow area). Energy shortfalls are often referred to as “unserved energy” or energy inadequacy.

2029 unserved energy day for New England from NERC LTRA



*This figure is a recreation of the extreme event energy analysis shown in the LTRA for New England. We did not independently reproduce this analysis.

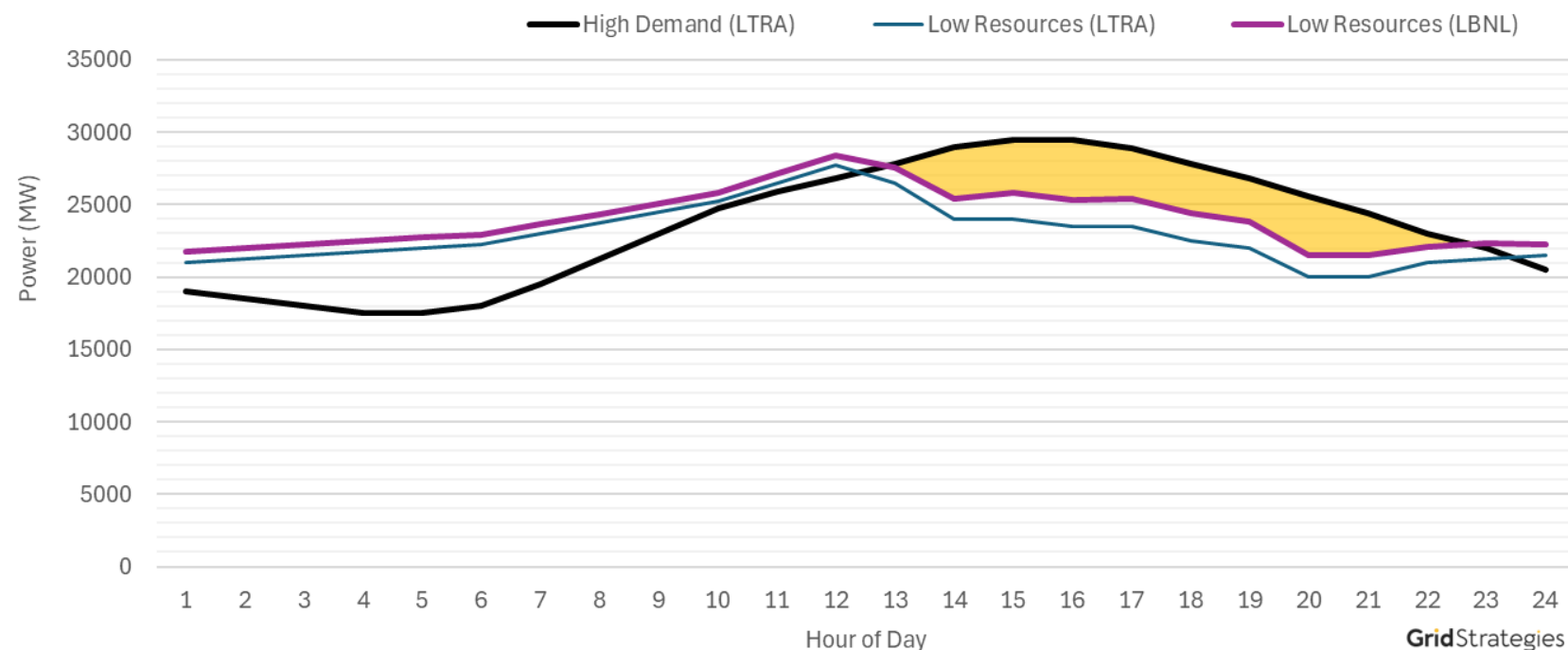
Using LBNL resource assumptions for New England greatly reduces unserved energy risk during peak load days.

LBNL data records more solar, offshore wind, and storage resources than the NERC data.* Lower-than-expected production from the LBNL-identified resource mix (purple line) better matches the times of high demand (black) than the NERC-identified resource mix (blue).

Given accredited, likely-to-connect Tier 1 and 2 resource capacity from LBNL, the amount of potential unserved energy on peak summer days in New England is reduced by nearly 40% of that calculated using NERC data. If capacity had not been reduced by expected withdrawals, the unserved energy shown here would be completely resolved.

Diverse resource mixes—especially those matched to the load profiles of the region—provide major benefits to withstand extreme grid events.

2029 unserved energy day for New England from NERC LTRA compared against LBNL Tier 1+2 additions
Resource-specific capacity accreditation applied to all resources and historic regional withdrawal rate applied to batteries.



*See the Methodology section for more details.

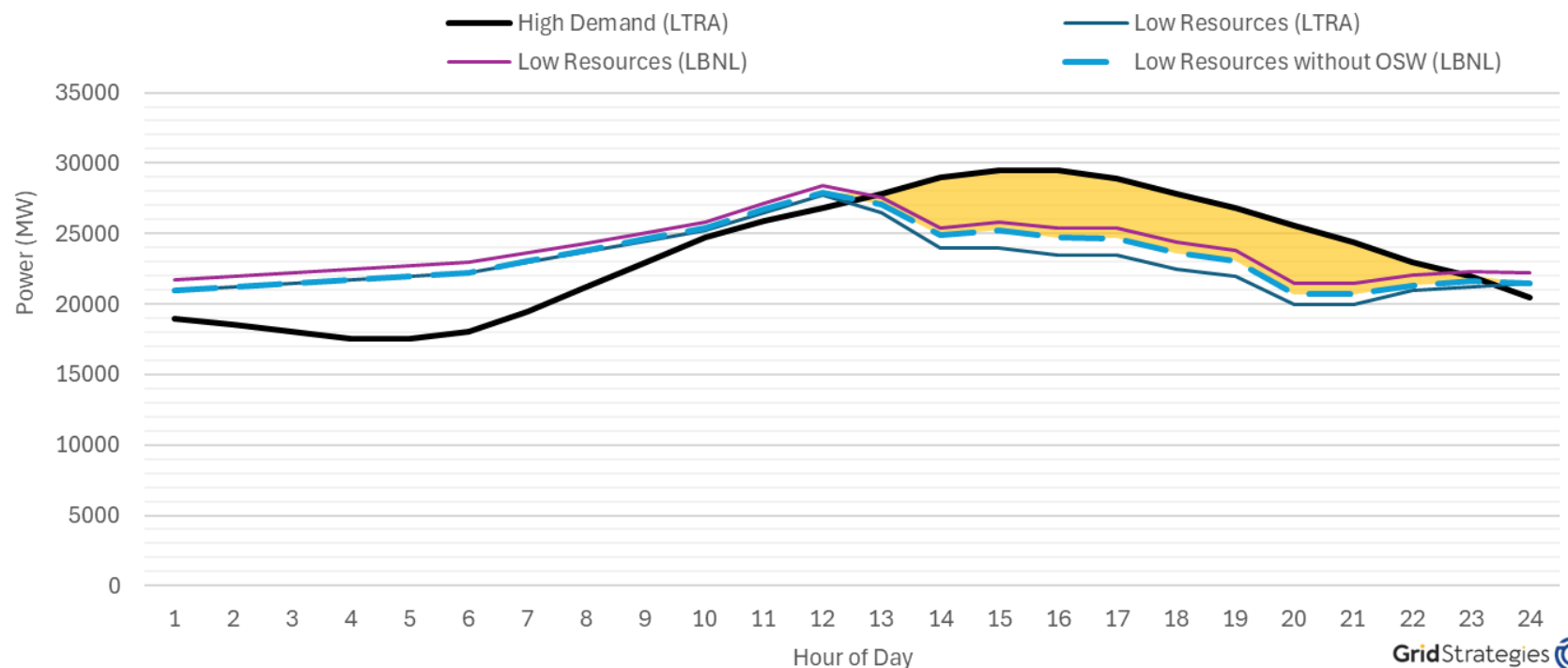
As with seasonal capacity adequacy, permitting and/or construction delays of resources with executed IAs are likely to exacerbate energy inadequacy risk during extreme grid events.

Delays of resources progressing through the queues or with executed IAs, whatever the cause, will exacerbate the risk of unserved energy during extreme grid events. Currently, offshore wind is facing additional permitting and construction hurdles. This is especially noteworthy for New England, where strong afternoon offshore wind output could directly reduce unserved energy risk during peak load hours.

Near-term unserved energy risk increases substantially given the delay or cancellation of planned offshore wind generation.

Given the low production of a resource mix without offshore wind (shown as the blue dotted line), the unserved energy risk is only reduced by 20% instead of 40% of that calculated in the LTRA.

2029 unserved energy day for New England from NERC LTRA compared against LBNL Tier 1+2 additions (accredited and adjusted) without offshore wind



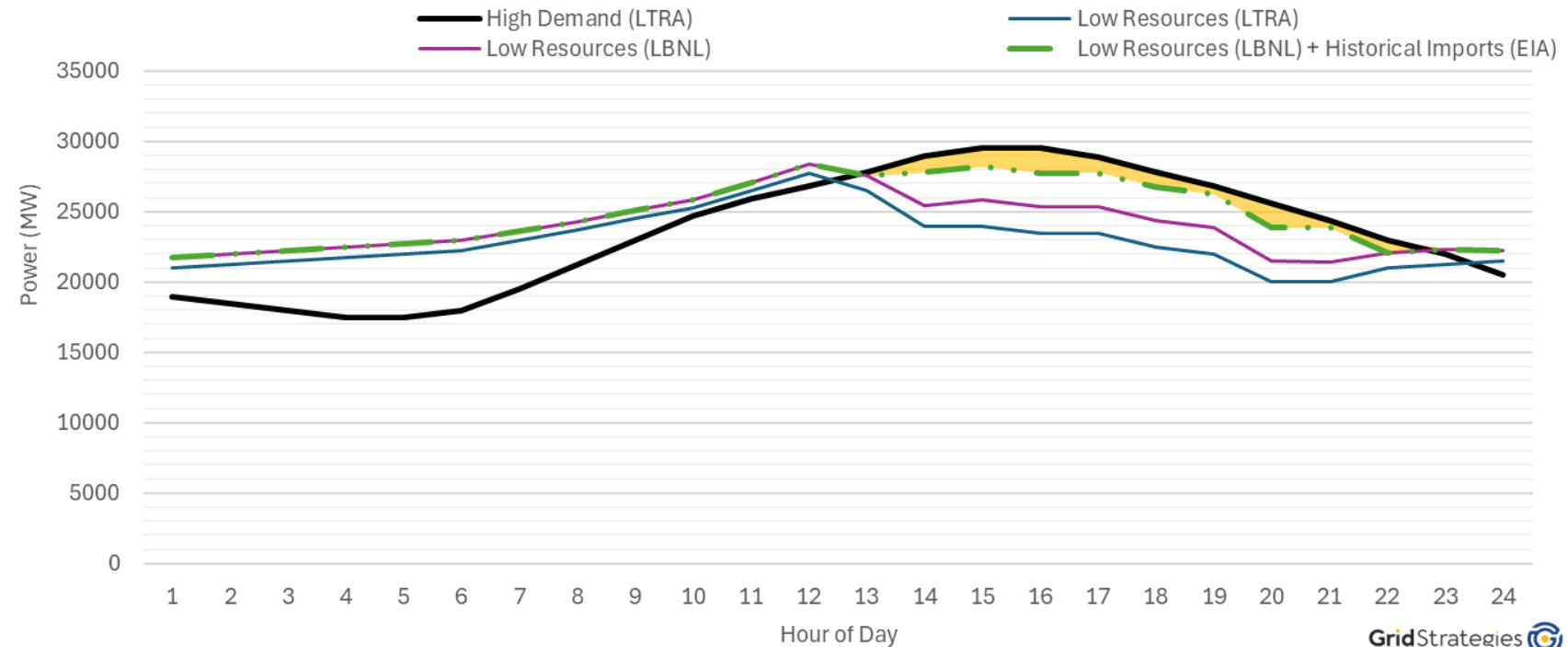
Interregional transmission designed to move power between regions during times of grid stress further reduces unserved energy risk.

As explained in slides 15-17, NERC only includes firm imports in its seasonal capacity or energy adequacy analysis. This ignores the likelihood of additional “non-firm” imports which are historically available to regions during extreme events. Non-firm imports are those which are not contracted for use during normal operations, but that neighboring regions can export to regions experiencing heightened stress.

Adding the imports which have been historically available to New England during extreme events further reduces expected unserved energy.

The combination of likely-to-connect generation from the interconnection queues and historically available non-firm import data nearly eliminates the unserved energy risk calculated using the LTRA assumptions.

2029 unserved energy day for New England from NERC LTRA compared against LBNL Tier 1+2 additions (accredited and adjusted) and historical import availability from EIA



Conclusions and Solutions

In this analysis, we considered different assumptions for generation resource, interregional transmission, and demand than the LTRA. The combination of all three suggest all regions could be resource adequate.

The regional seasonal resource adequacy risks identified in the 2025 NERC LTRA are all resolved when evaluated under different input assumptions:



Including generation that is actively working through the interconnection queues in each region (Tiers 1 & 2)

Discounting all generation nameplate capacity by the resource and region-specific accreditation methods

Discounting generation queue data by historic regional and phase-specific withdraw rates



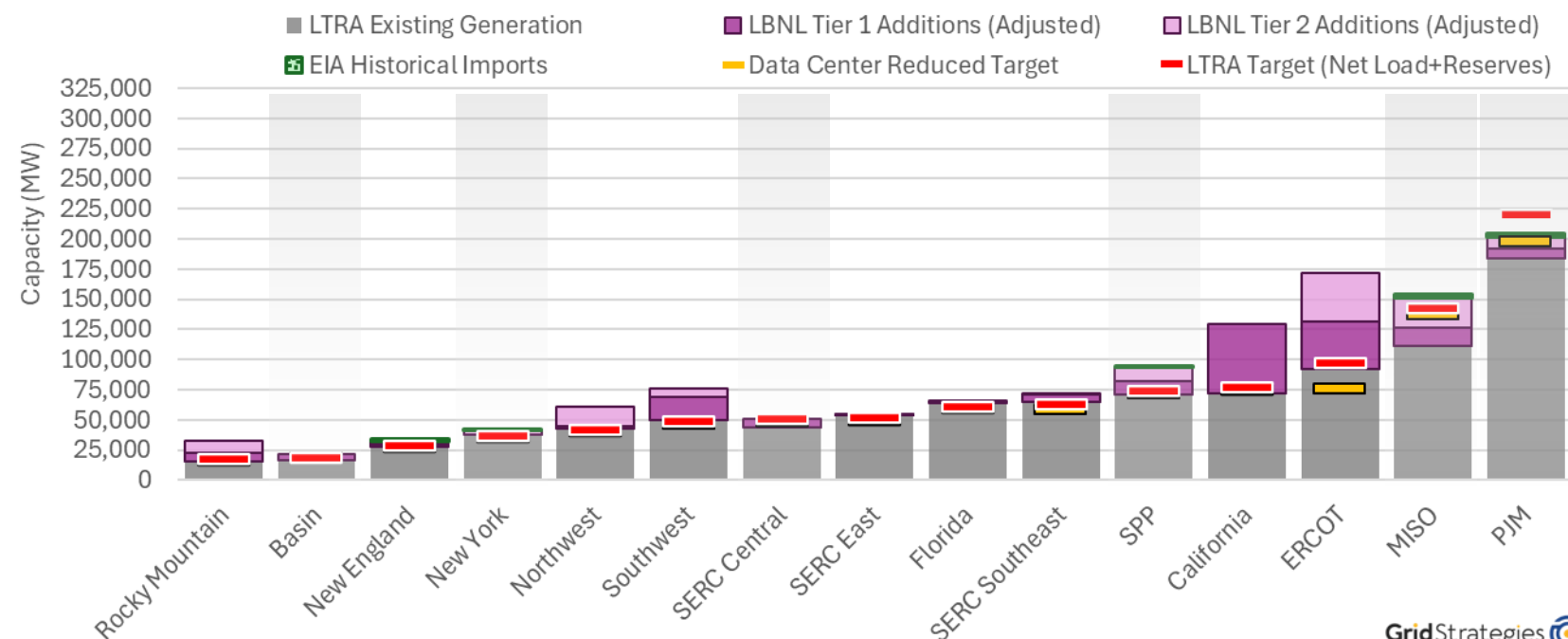
Consideration of historic non-firm imports during extreme events

Including increased interregional transfer capability capacity (albeit low likelihood of 2030 in-service date)



Reduced data center load to account for microchip industry supply chain constraints and generation flexibility

Summer 2030 seasonal capacity with queue additions from LBNL database (adjusted for expected withdrawals), interregional import capacity (adjusted for historical imports), and reduced data center load



While reduced risk is likely given different assumptions, these results should not be taken for granted. Enacting existing solutions is needed to stave off future reliability risk.



Resource supply is available to meet rising needs but is encountering roadblocks. Potential solutions include:

- More efficient interconnection queues for all resources
- Permitting certainty and reduced construction delays for needed grid infrastructure
- Adopting reforms to increase coordination between transmission planning and generator interconnection



Additional import capability would help alleviate tight reserve margins. Potential solutions include:

- Appropriately valuing the resource adequacy (capacity) contribution of interregional transmission
- Comprehensive transmission planning processes that consider both firm and non-firm imports
- Acting on NERC's recommended interregional transfer capability additions



Tightening reserve margins are driven primarily by demand growth from large source loads, such as data centers. Potential solutions include:

- Reducing the uncertainty and lack of transparency in load forecasts
- Regulatory solutions to connect large loads reliably

Methodology

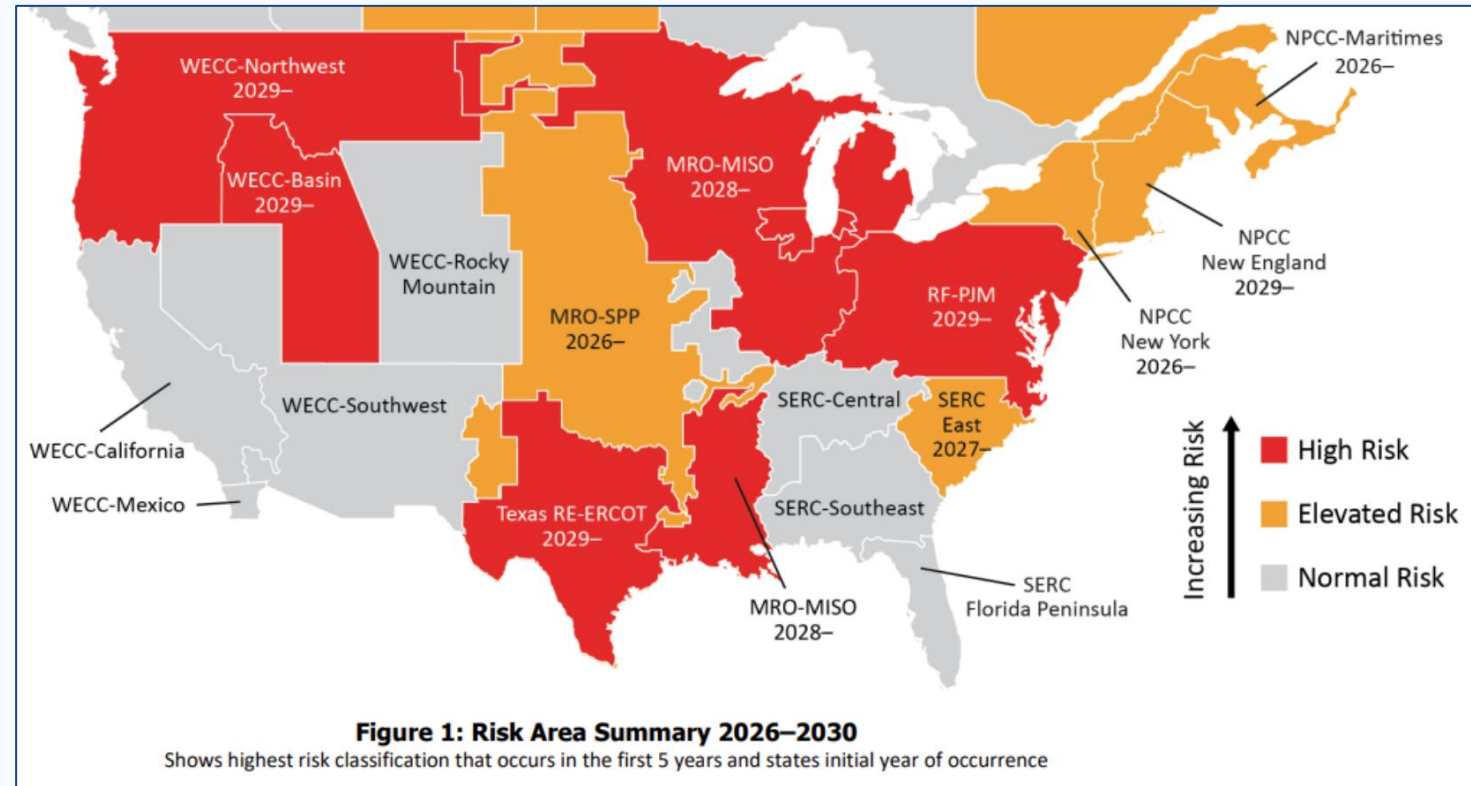
The NERC LTRA assesses each region's ability to meet both its future capacity and energy adequacy needs.

NERC's LTRA importantly captures potential reliability issues for a snapshot in time. Risk is defined by tightening reserve margins—the difference between electricity demand and available supply.

In its 2025 version, NERC identified several regions* as either **High** or **Elevated** risk of not being able to meet their future capacity and energy needs.

Seasonal capacity shortfall risk: MISO, PJM, and SERC-Central (with SPP and Basin on the margin)

Extreme event energy shortfall risk: MISO, PJM, New England, New York, SERC-East, Basin, Northwest, and ERCOT

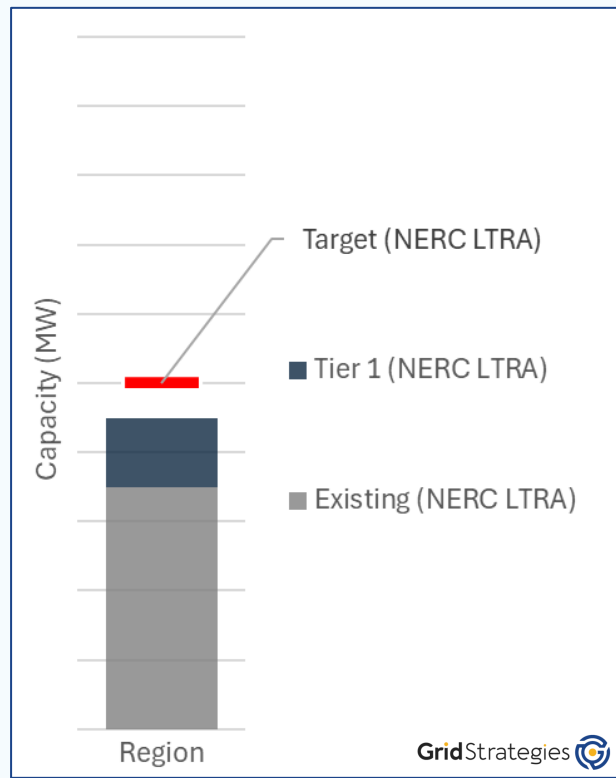


*NERC did not mark SERC-Central as elevated risk despite showing large seasonal shortfalls while SPP was marked as elevated risk despite having neither seasonal capacity shortfalls nor extreme event energy shortfalls.

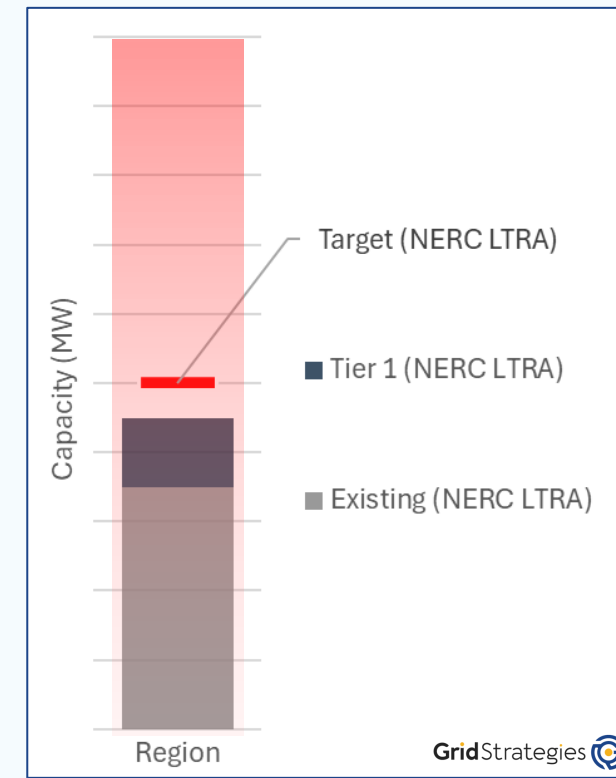
Illustrative walkthrough of seasonal capacity slides

Bar charts showing the existing (light grey) and future (dark blue) resource capacity in each region using NERC LTRA data. The target capacity (red line) is also shown. These charts were created by Grid Strategies using NERC data.

A red highlight is used to signify a shortfall between the existing + future resource capacity and the needed target to meet future load and reserves. A yellow highlight would be used to signify a “near miss.”



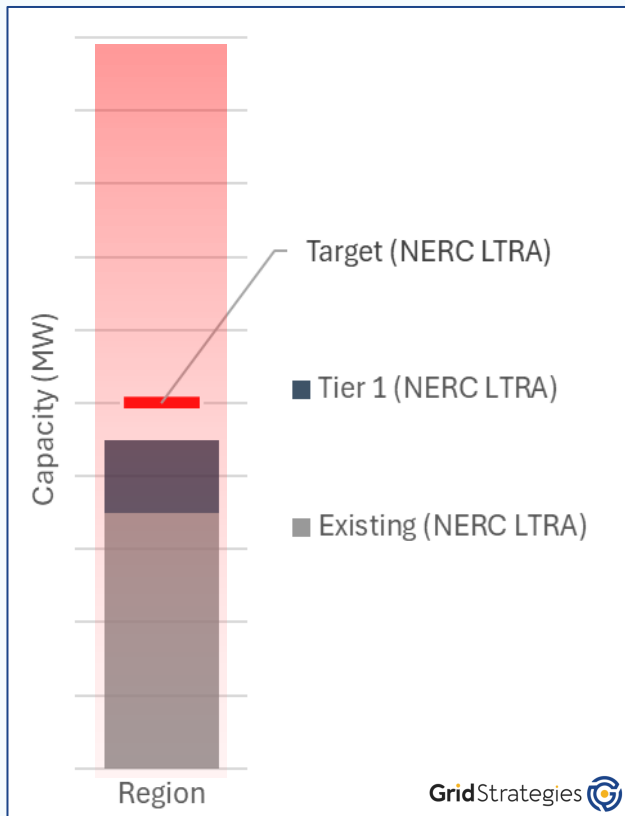
Highlight important features of chart



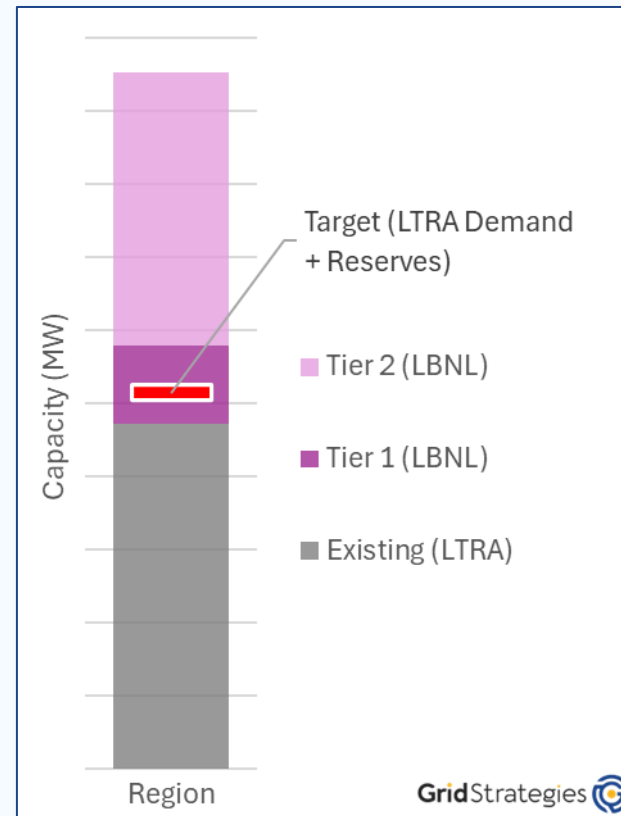
Illustrative walkthrough of seasonal capacity slides

Replace the NERC LTRA resource capacity data with accredited LBNL interconnection queue data (purple) for comparison. Existing and target data is from LTRA and remains unchanged unless specified.

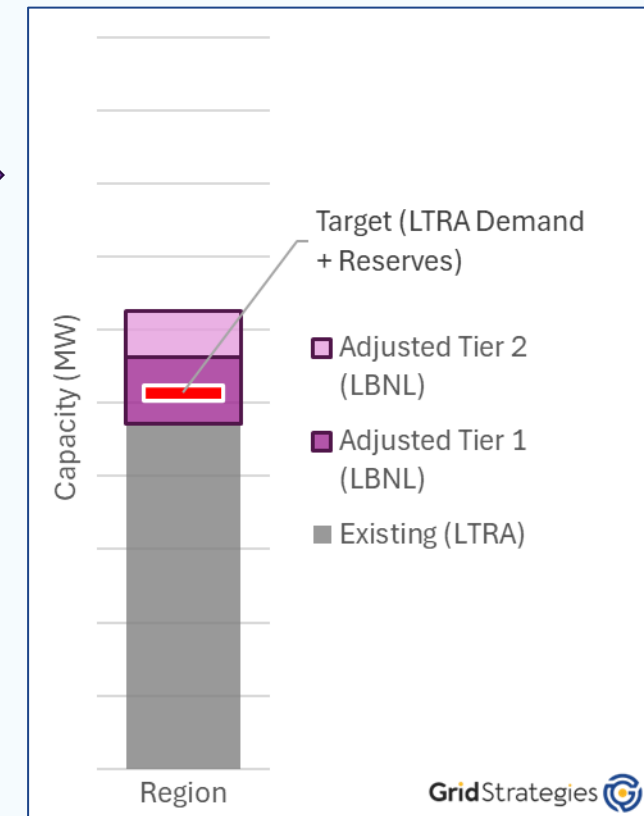
To avoid overcounting queue generation, the LBNL data is discounted based on regional- and study phase-specific withdraw rates.



Replace NERC data with resource-accredited LBNL data



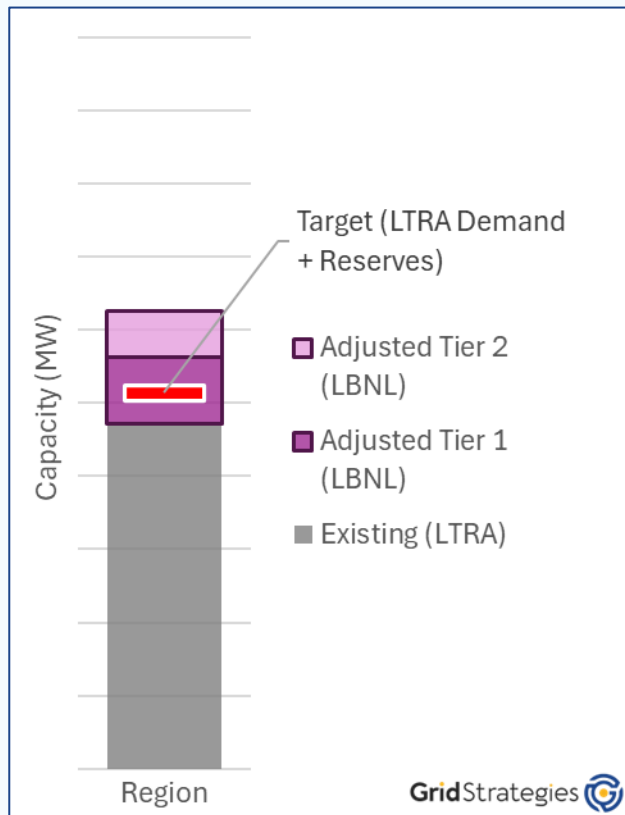
Reduce LBNL data based on expected withdraws



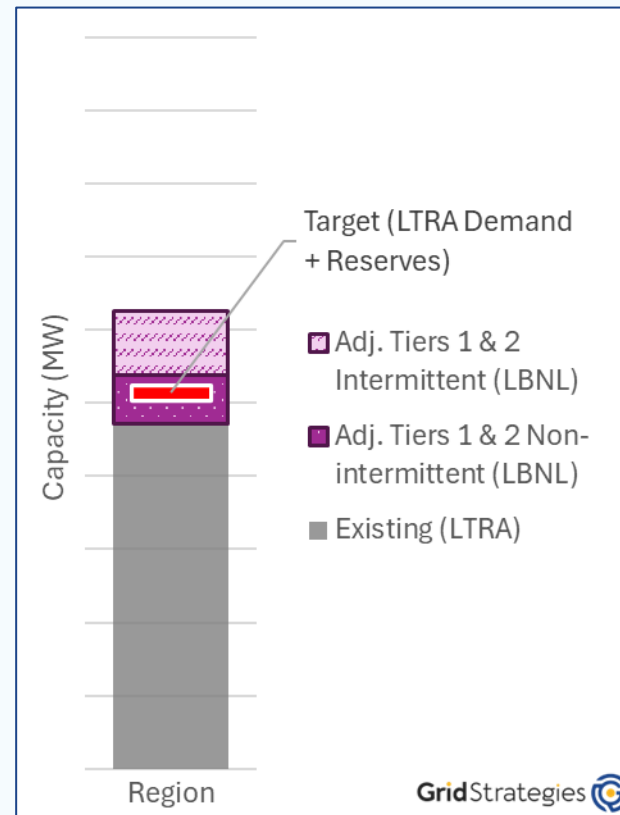
Illustrative walkthrough of seasonal capacity slides

Analyze the LBNL resource data to gain insight into future capacity risk. Purple is still used for LBNL data while different bar borders or pattern are used to indicate interesting features of the data.

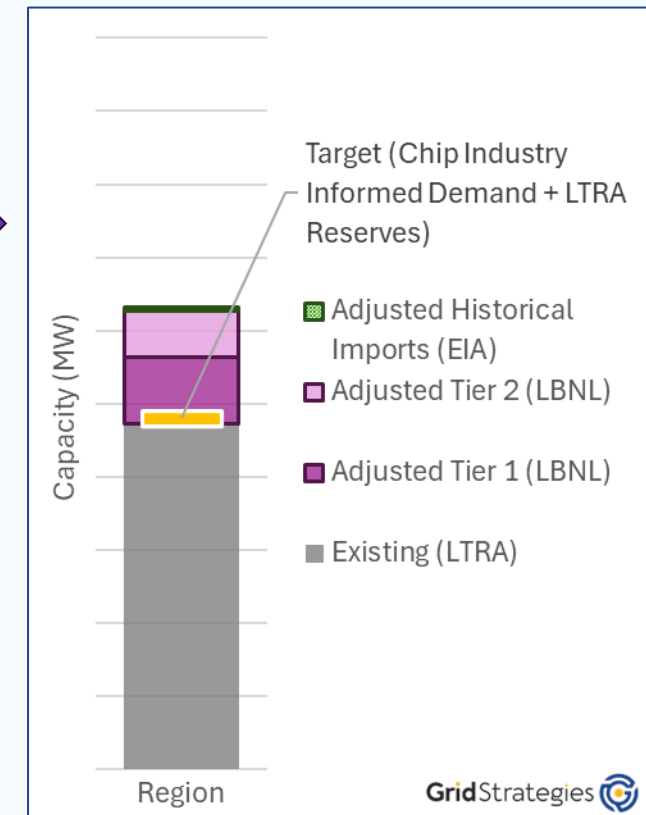
Interregional transfer capability data is adjusted using EIA data to better illustrate available capacity. In some cases, the expected load is changed to match demand forecasts from other sources.



Look at
different
features of
LBNL data



Continue to
add more
data for
analysis



Summary slide of seasonal capacity differences in 2030

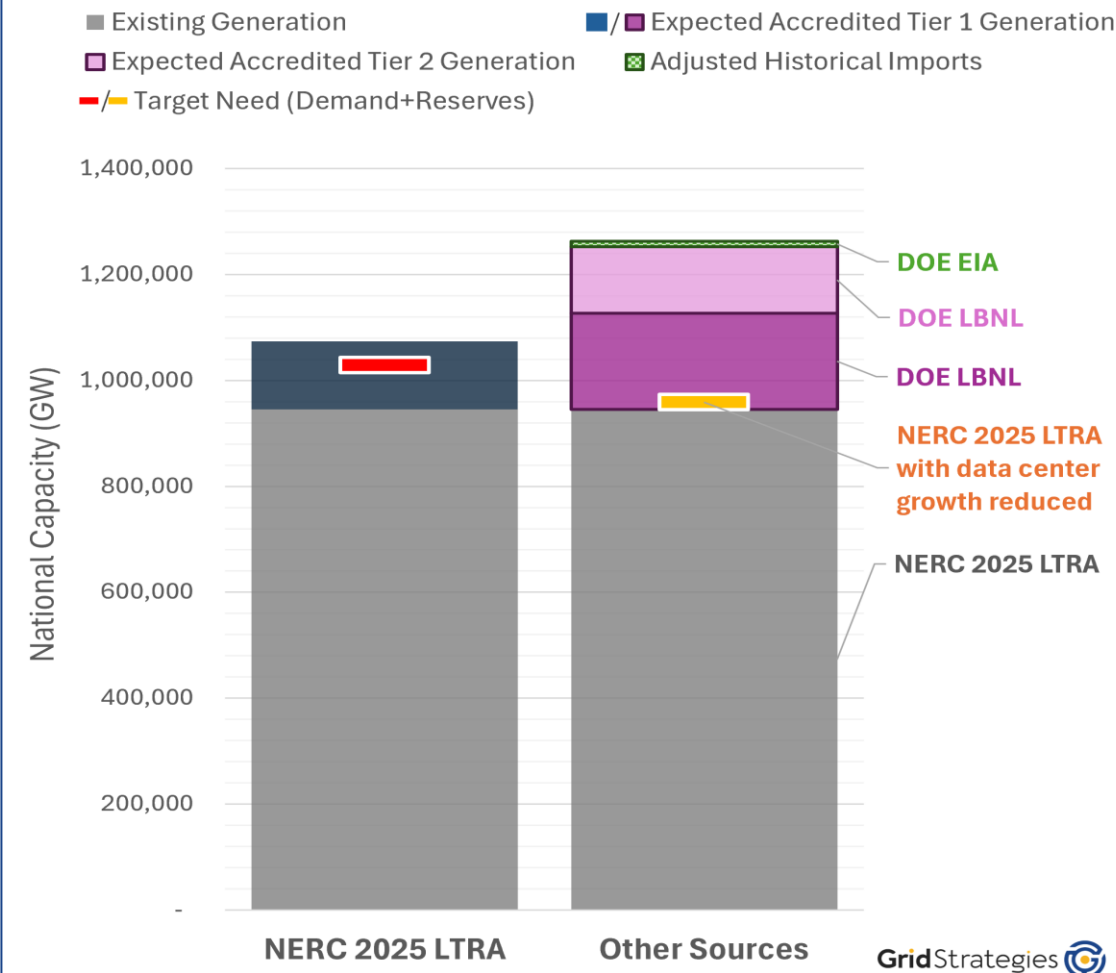
On Slide 6, the comparison of NERC 2025 LTRA analysis against our analysis using other sources is meant as an illustrative comparison of the national risk given the use of different credible data sources.

The NERC 2025 LTRA bar was made by summing the forecasted 2030 summer load + reserves (target), existing generation, and Tier 1 data for each region directly from the NERC data.

The target value shown in “Other Sources” was created by applying a one third derate to known data center load growth in all regions. The one-third derate factor is the ratio of estimated data center growth in 2030 from chip shipments to the estimated growth from utility roll-ups as used by LTRA (Wilson, J., et al. 2025). Another one-third derate factor is from the assumption that many data centers are likely to use some form of on-site generation or storage to curtail their peak demand (Thomas, M., 2026). The known data center load growth is from Grid Strategies analysis of total system load growth that is attributable to data centers (Wilson, J., et al. 2025). The impact of this data center growth reduction scenario on individual regions is shown in slide 24.

The generation resources shown in “Other Sources” is the sum of resources available in the LBNL dataset that are reasonably expected to connect by 2030. Adjusted historical imports represent the non-firm imports that have been available during grid stress events from the Energy Information Administration. More detail on the other sources data is provided in subsequent slides.

Will there be enough capacity to meet 2030 summer needs?
NERC's 2025 LTRA compared against other data sources.



Analysis using LBNL data: Regional assessment areas

The DOE's Lawrence Berkeley National Laboratory collects data from the generation interconnection queues for seven ISOs / RTOs and 49 non-ISO balancing areas (including utilities and Power Marketing Administrations), representing roughly 97% of currently installed U.S. generating capacity. This data is compiled annually with help from Interconnection.fyi and is posted for public view at emp.lbl.gov/queues. The 2025 dataset includes data through the end of 2024.

The 56 entities in the LBNL database were mapped to the NERC LTRA assessment areas by geography (maps to the right). The non-RTO utilities were mapped as follows:

WECC California

- LADWP
- SMUD
- WAPA-SN

WECC Rocky Mtn

- CLPT
- BHCT
- CSU
- PacifiCorp
- PRPA
- PSCo
- TSGT
- WAPA-RM

WECC Northwest

- Avista
- BHP
- BPA
- CPUD
- GrantPUD
- MPC
- NWMT
- PGE
- PSE
- TPU
- WAPA-IS

WECC Basin

- IdahoPower

WECC Southwest

- APS
- EPE
- IID
- N-C
- NVE
- PNM
- SRP_ANPP
- SRP
- SRP_Gila
- SRP_PV-PC
- SRP_SWV
- TEP
- WAPA-DSW
- WAPA-MPP

SERC Central

- AEC
- LGE-KU
- TVA

SERC Southeast

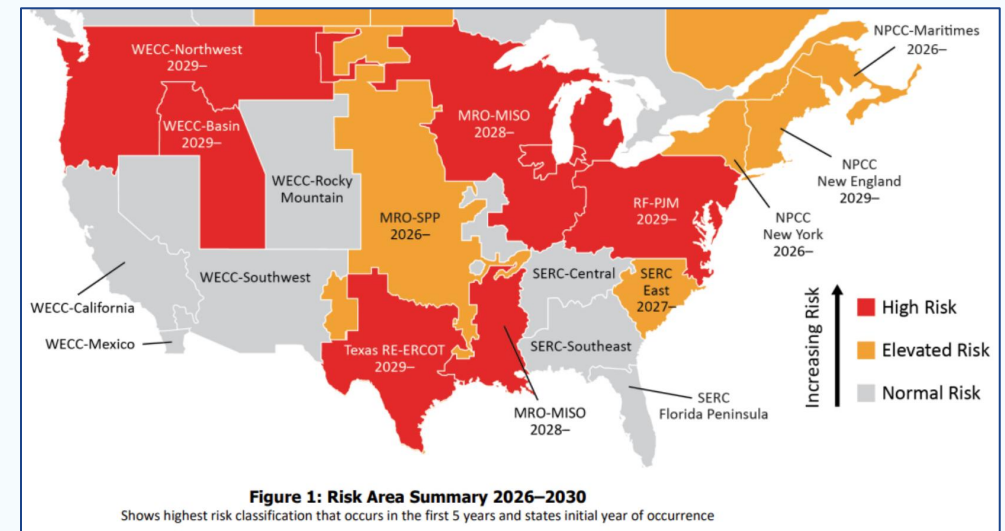
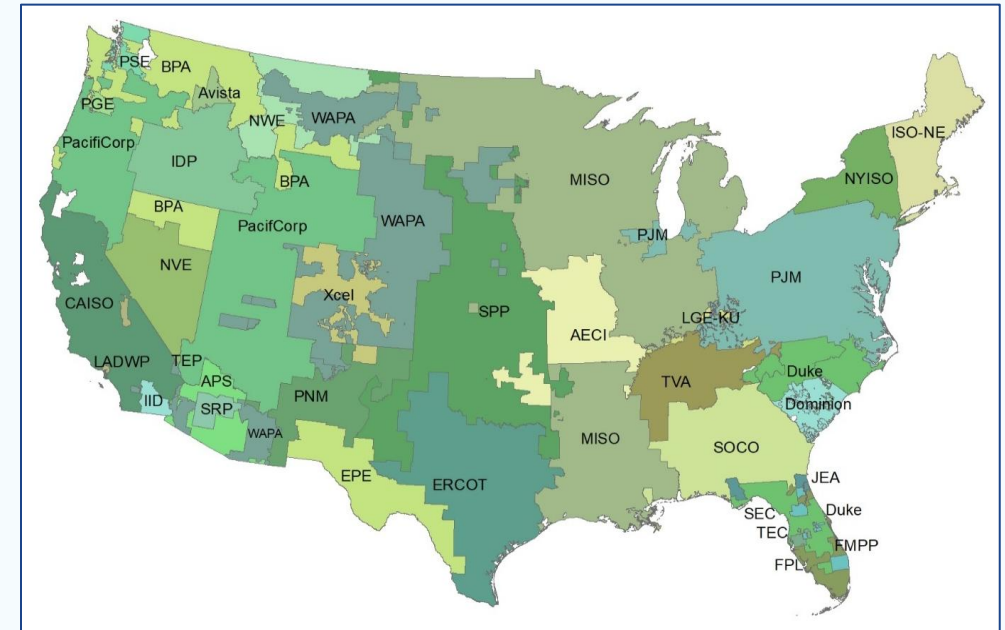
- GTC
- SOCO

SERC Florida

- OUC
- TEC
- Duke (FL)

SERC East

- Dominion
- S-C
- Duke (non-FL)



Analysis of LBNL data: Generation tier status

LBNL interconnection data is organized by its queue status and study phase in the interconnection queues. Queue status refers to if the facility is completed, withdrawn, or actively progressing through the queues.

NERC organizes in-development generation resources by Tiers, where:

- Tier 1 are resources with executed interconnection agreements
- Tier 2 are any resource that is in the study process, and
- Tier 3 are those that have submitted interconnection requests but are not yet under study.

The cross-walk between LBNL's "Queue Status" and "IA Status Clean" fields and the NERC Tiers used in this analysis are shown to the right. Interconnection requests marked as Active in the Queue Status are organized into Tiers based on their IA Status.

Resources considered in to be in advanced Tier 2 status were those with either "IA Pending" or "Facility Study" status in the LBNL data. Suspended interconnection requests are considered Tier 2 because they have already completed some study phases but have paused their continuation of progress. Requests that un-pause often enter at the same study stage. Requests of Unknown or N/A status are considered Tier 3 because their existence in the database indicates an interconnection request has been made, but whether studies have begun cannot be said for sure.

LBNL Queue Status	NERC Tier
Active	(see IA Status)
Withdrawn	Cancelled
Operational	Operational
Suspended	Tier 2
Unknown	Tier 3
LBNL IA Status Clean	NERC Tier
Withdrawn	Cancelled
Operational	Operational
IA Executed	Tier 1
Construction	Tier 1
IA Pending	Tier 2
Facility Study	Tier 2
Cluster Study	Tier 2
System Impact Study	Tier 2
Feasibility Study	Tier 2
Combined	Tier 2
In Progress (unknown study)	Tier 2
Suspended	Tier 2
Not Started	Tier 3
N/A	Tier 3

Analysis using LBNL data: Expected withdraw rates

To reduce the likelihood of overcounting generation resources that may not interconnect, we reduced all Tier 1 and 2 resource data in the LBNL queue dataset given region- and status-specific historic withdraw rates.

LBNL publishes the completion rates (as of 2024) of all resources in the regional queues that entered the queue between 2000 and 2019. The withdraw rates vary regionally between 64% and 85%. LBNL also provides information about the queue study phase that projects were in when they withdrew. In general, fewer projects withdraw once they reach advanced stages of the interconnection queue process.

Applying the regional withdraw rates to all generation without regard for its queue location would overly discount generation in Tier 1 and advanced Tier 2 status. Instead, we adjust the amount of generation that is expected to withdraw from each Tier separately. See illustrative figure to the bottom right.

We first calculate the total amount of expected regional withdraws by applying the appropriate withdraw rate to the sum of all Tiers 1, 2, and 3 generation in each region's queue. We assume that 15% of generation in Tier 1 status will withdraw, equivalent to the share of withdrawn requests between 2019 – 2023 in the IA executed phase from LBNL's analysis. Because no generation in Tier 3 is expected to interconnect by 2030, we assume 100% of Tier 3 generation withdraws for every region. The difference between the total amount of expected regional withdraws and that which is assumed to withdraw from Tiers 1 and 3 in each region is applied to the Tier 2 data.

LBNL: Historical completion by region for requests submitted 2000-2019 (as of 2024)

Region	Active	Operational	Withdrawn
CAISO	14%	9%	77%
ERCOT	14%	22%	64%
ISO-NE	8%	18%	74%
MISO	9%	15%	76%
NYISO	7%	8%	85%
PJM	8%	14%	77%
SPP	9%	14%	76%
Southeast	5%	9%	85%
West	13%	9%	79%

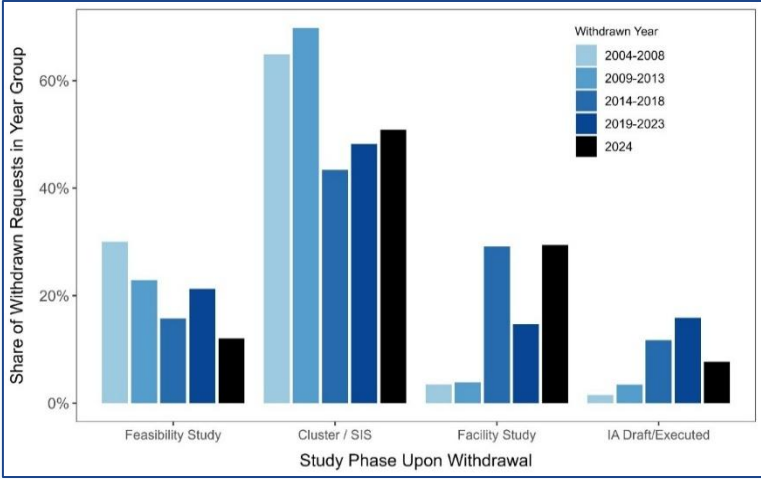
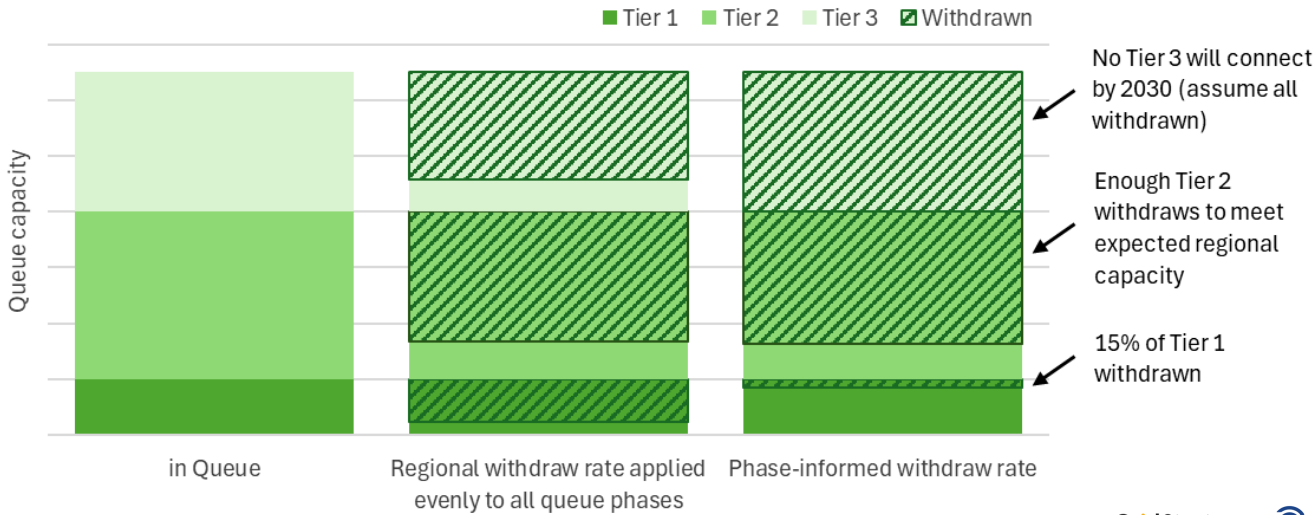


Illustration of two different methods to apply regional withdraw rates to interconnection queue data. The same amount of generation capacity withdraws in both methods.



Analysis using LBNL data: Resource type

LBNL interconnection data is organized by generation resource type. When multiple resource types (e.g., gas and battery storage) are combined into one interconnection request, LBNL lists each resource type. The LBNL database includes a “type_clean” field, which summarizes all types of resources included in the interconnection entry.

These “clean” resource types are organized into a fewer number of categories in our analysis for simplicity. The cross-walk is provided in the two tables to the right.

LBNL Clean Type	Resource Type	LBNL Clean Type	Resource Type
Battery	Battery	Coal	Coal
Offshore Wind+Battery	Battery Hybrid	Gas+Battery	Firm Hybrid
Other+Battery	Battery Hybrid	Gas+Battery+Diesel	Firm Hybrid
Solar+Battery	Battery Hybrid	Gas+Coal	Firm Hybrid
Solar+Other+Battery	Battery Hybrid	Gas+Diesel	Firm Hybrid
Solar+Wind+Battery	Battery Hybrid	Gas+Oil	Firm Hybrid
Wind+Battery	Battery Hybrid	Gas+Other	Firm Hybrid
Geothermal	Geothermal	Geothermal+Battery	Firm Hybrid
Solar+Other	Hybrid	Hydro+Battery	Firm Hybrid
Solar+Wind	Hybrid	Oil+Battery	Firm Hybrid
Wind+Other	Hybrid	Oil+Coal	Firm Hybrid
Hydro	Hydro	Oil+Other	Firm Hybrid
Offshore Wind	Offshore Wind	Other+Coal	Firm Hybrid
Other	Other	Other+Diesel	Firm Hybrid
Hydrogen	Other Storage	Solar+Diesel	Firm Hybrid
Other Storage	Other Storage	Solar+Gas	Firm Hybrid
Solar	Solar	Solar+Gas+Battery	Firm Hybrid
Battery+Other Storage	Storage Hybrid	Solar+Geothermal	Firm Hybrid
Other+Battery+Other Storage	Storage Hybrid	Solar+Hydro	Firm Hybrid
Solar+Battery+Other Storage	Storage Hybrid	Wind+Gas	Firm Hybrid
Solar+Wind+Other Storage	Storage Hybrid	Gas	Gas
Wind	Wind	Diesel	Oil
		Oil	Oil
		Nuclear	Nuclear

Analysis using LBNL data: Accredited capacity

No resource will produce electricity at its rated capacity (“nameplate”) all the time. To account for this, regions apply an accredited value to a resource to indicate a percentage of the nameplate capacity that can be expected to perform during peak demand. The accredited value of a resource varies by fuel type, season, year, and geographic location.

Each region calculates accredited capacity differently. Some consider historic forced outages of a resource type (which tend to overestimate availability) while others use modeling tools to determine how much load a resource can be expected to carry in future years given numerous system dynamics.

The LBNL interconnection queue database provides nameplate values for all generators in the queues. To ensure only a reasonable amount of new resources are accounted for in our analysis, we seasonally accredit each resource type based on the region-specific method used locally for resource accreditation. If a region does not use seasonal or resource-specific accreditation, a neighboring region’s method is used.

Unless otherwise noted:

- Battery Hybrid resources are equivalent to battery resources’ accredited values
- Firm Hybrid resources are the average of firm resources’ accredited values
- Hybrid resources are the average of wind and solar resources’ accredited values
- Other resources are the average of any remaining resources’ accredited values not otherwise listed

Region	Accreditation Method & Source	Notes
MISO	2025-2026 DL0L	Summer & winter values. Battery resource uses storage (blended) and storage hybrid uses pumped storage DL0L. MISO values are also used for all other regions’ resources that are not otherwise noted.
SPP	ELCC for Summer 2026	Summer values for battery (6-hr), solar, and wind resources. Values also used for WECC-Basin & CAISO summer battery.
SPP	ELCC for Winter 24/25	Winter values for battery (6-hr), solar, and wind resources. Values also used for WECC-Basin & CAISO summer battery.
SPP	25/26 EFORD	Summer & winter values used for all non variable resources. Oil and other resources are RICE with on-site storage, gas is CC. Values also used for ERCOT other; WECC summer other storage.
ISO-NE	CAR-SA: Impact Analysis 1/14/26	Summer & winter values. Used for solar, wind, and hydro resources
ISO-NE	2025 Capacity, Energy, Loads, and Transmission (CELT) Report	Summer & winter values. CELT used for battery, battery hybrid, coal, gas, nuclear, offshore wind, oil, other, and other (pumped) storage resources.
NYISO	2025-2026 Final Capacity Accreditation Factors	Summer values used for both seasons. Rest of state values used for battery (6-hour), hydro, offshore wind, other, other storage (pumped storage), solar, wind.
NYISO	2024 Review of EFORD	Summer & winter values. NYCA values used for coal (steam turbine), gas (CC), nuclear (steam turbine), oil (jet engine). NYISO values are also used for SERC-E summer battery and summer wind.
PJM	2027/2028 ELCC Class Ratings	Summer values used for both seasons for all resources. Battery is 6-hour CSR, battery hybrid is configuration 3, gas is CC, other is waste-to-energy, other storage is other unlimited resources, solar is fixed-tilt, storage hybrid is configuration 1. PJM values also used for SERC-E hydro, nuclear, oil, other, and other storage resources.
ERCOT	25/29 CDR	Summer & winter values for battery (6-hr), other storage (12-hr), solar, and wind. Values also used for SERC-FP and SERC-SE battery.
SERC	2025 CRP Chapter 3	Winter values used for both seasons. 2030 Reference case used for battery (standalone BESS), battery hybrid (synergistic BESS), offshore wind (avg. ELCC for first 800MW), solar (avg. ELCC for first 10 GW of standalone), wind (avg. ELCC for DEP and DEC for first 300 MW).
SERC	2023 Wind ELCC Study	Average ELCC of 5GW and 15GW standalone solar used for all SERC regions’ summer solar.
Southwest	E3 2023 Resource Adequacy in the Desert Southwest	2033 values also used for WECC regions’ winter battery, summer hydro, summer nuclear, winter and summer wind (unless otherwise stated).
Northwest	E3 2025 Resource Adequacy and the Energy Transition in the Pacific Northwest: Phase 1 Results	Winter values for Greater Northwest used for WECC regions’ gas, other storage, solar, wind (unless otherwise stated).
Northwest	E2 2019 Resource Adequacy in the Pacific Northwest	Winter values for 2030 Reference scenario used for WECC regions’ coal, geothermal, hydro, nuclear (unless otherwise stated).
CAISO	2026 Net Qualifying Capacity (NQC) for RA Resources	Summer and winter values used for CAISO geothermal, hydro, other (biomass), solar, wind. Values also used for other WECC regions’ other, solar, hydro and geothermal (unless otherwise stated).
National	NREL VRE ELCC Study	Median offshore wind used for SERC-FP (SERC), ERCOT, WECC-NW (NorthernGrid), CAISO

Adding historically available interregional transfer capability to the seasonal capability analysis

The EIA historical imports included in the charts on slides 16 and 29 take the difference between the historical import availability (2015 and 2025) from the U.S. EIA Form 930 data and the 2030 firm import assumptions in the LTRA. The last column subtracts imports from demand in all peak hours over the last decade and shows the minimum reduction in in-region generation due to imports.

For New York, an additional 1,250 MW of import availability was added to the EIA Form 930 data to account for the energization of the Champlain Hudson Power Express transmission line.

Comparison of on-peak net imports in four regions as assumed by LTRA against actual, in MW. Exports are negative.

	LTRA 2026 Assumption	LTRA 2030 Assumption	Historical Availability (2015-2025)
MISO	2,809	2,509	5,344
SPP	-18	-78	1,421
ISONE*	567	84	2,464
NYISO	3,405	3,486	2,730 [†]
PJM	3,840	0	2,937 [‡]

*Data for New England (ISONE) predates completion of the 1200 MW New England Clean Energy Connect with Hydro Quebec, so on-peak imports will likely be higher going forward.

[†] EIA data for New York does not include the Champlain Hudson Power Express, a 1,250 MW line connecting Quebec to New York City that is slated for completion in 2026. Once that is included, NYISO imports should be roughly in line with the LTRA.

[‡] The EIA data show PJM was exporting during most peak demand periods over the last decade, so it is not possible to estimate the historical availability of imports for PJM. PJM administratively sets its capacity benefit of ties (non-firm imports) at 1.5% of nameplate generation procured in the capacity market, calculated here as 1.5% for 195,831 MW in the 2025/2026 Base Residual Auction. In its 2023 reserve margin analysis, PJM calculated 6,474 MW in total diversity benefit with its neighbors, much higher than the capacity benefit of ties shown in the table.

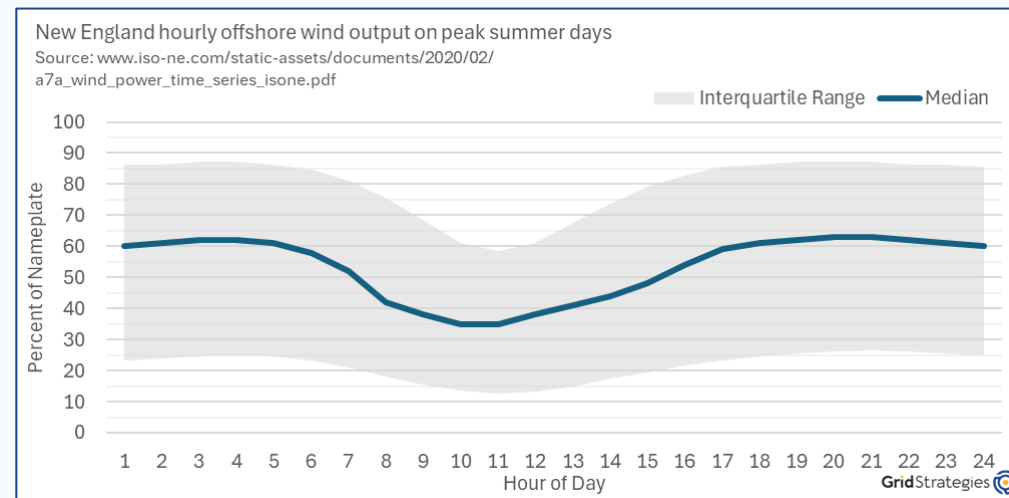
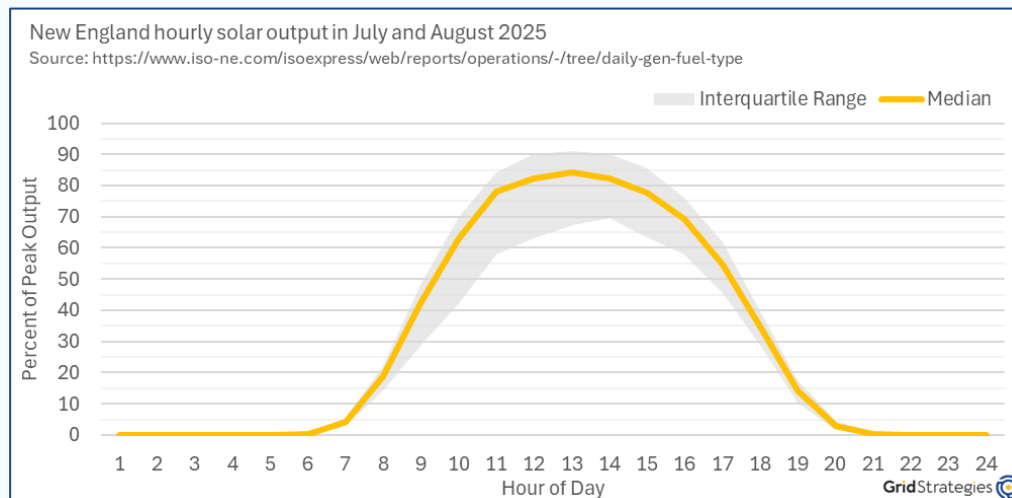
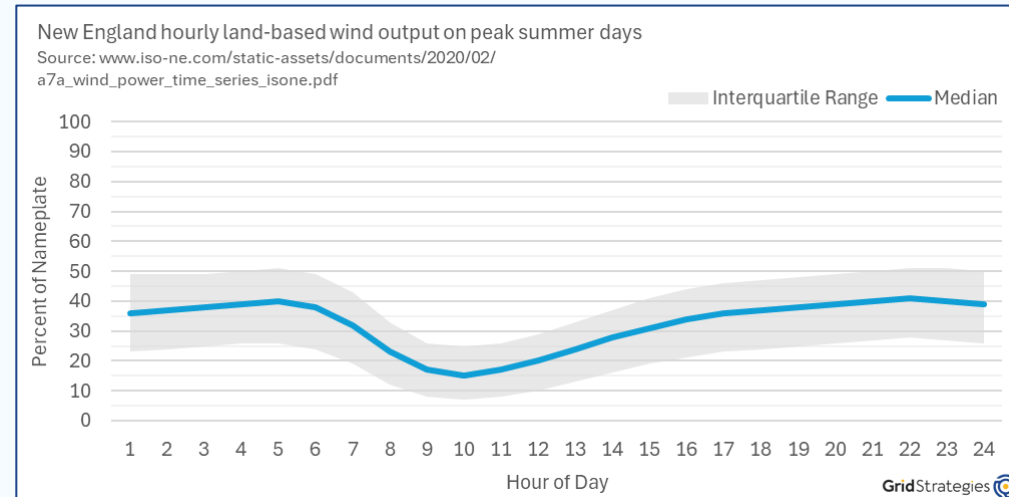
Analysis using LBNL data: New England wind and solar production

In order to use LBNL data for energy analysis for New England, we compare the amount of Tier 1 and Tier 2 LBNL data against NERC (slide 46). This required an understanding of the generation output in New England during summer months for different resource types.

On the right are the hourly median and interquartile range for wind and offshore wind production in New England during peak demand days. This data was collected between 2012 and 2018 by ISONE to help them understand wind output during times of grid stress.

Also shown is the median and interquartile range for average hourly solar output in July and August of 2025, also from data collected by ISONE.

The hourly median data was used to estimate the output of both land-based and offshore wind in New England during peak summer 2029.

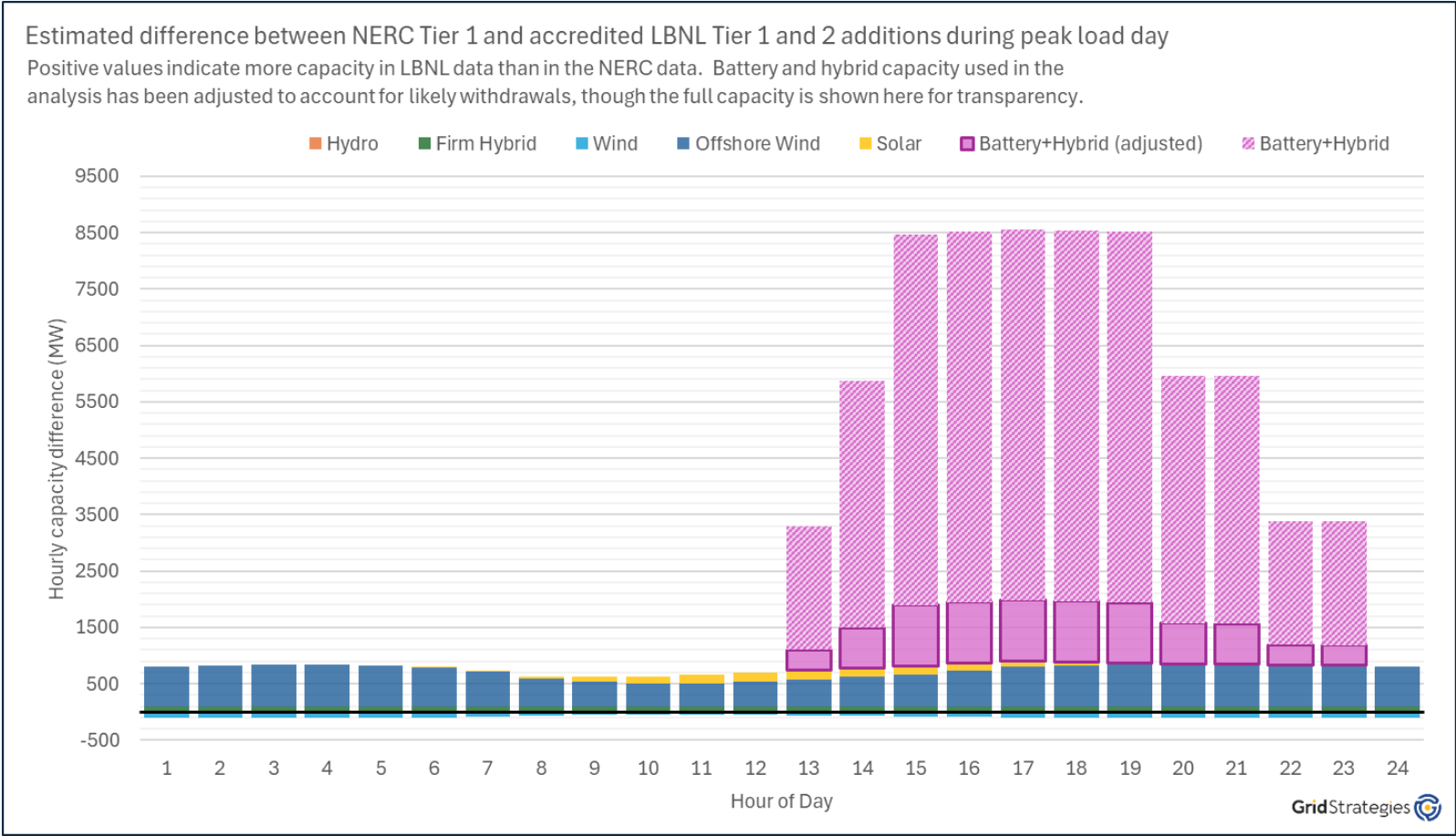


Analysis using LBNL data: New England hourly production

Shown here is the potential change in hourly energy output for New England on peak load days given the different resource mixes between the LBNL and NERC data. Positive values indicate LBNL recorded more capacity for that resource type while negative values indicate NERC recorded more capacity.

As explained on slide 45, we adjusted the hourly production of each resource type to match expected peak day behavior, given regional resource accreditation methods. Battery and battery hybrid resources are expected to discharge at partial capacity for all hours of unserved energy, modulating their output so that no one resource discharges for longer than 6 hours. Given the large quantity of battery and hybrid resources in the LBNL data, these resources were additionally discounted by the historic withdraw rate of the region.

Given the data available, we cannot replicate the energy inadequacy analysis presented in the LTRA exactly. We provide this rough estimate to understand how different generation assumptions would impact unserved energy results.



BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-183
2025 Western Assessment of Resource Adequacy



2025 Western Assessment of Resource Adequacy

WECC's annual Western Assessment of Resource Adequacy provides a high-level examination of risks to the reliability of the Western Interconnection related to resource adequacy over the next 10 years. Through an energy-based probabilistic approach, WECC examines the risks throughout the entire interconnection and

eight subregions, across all potential hours at risk (unlike traditional peak load hour assessments). This work is intended to help stakeholders target specific areas and topics for deeper evaluation and mitigation.

Key Takeaway

The West's planned resource buildout will not keep up with anticipated load growth over the next decade, particularly in the Basin and Northwest subregions. The West could see energy shortfalls as early as 2028.

This is the case even with an incredibly high amount of resource additions planned over the next 10 years, approximately half of which are speculative. Any delay or cancellation of planned resource additions would exacerbate the resource adequacy risk.

Further complicating the risk, 90% of planned additions are inverter-based resources. So, while it seems 177 GW of new resources should be able to serve 31 GW of projected load growth, most of the new resources are weather dependent, which creates uncertainty.

Much of the load growth is attributed to large loads. While there is uncertainty about whether large loads will materialize as predicted, even if some large loads do not, there is still a resource adequacy risk.

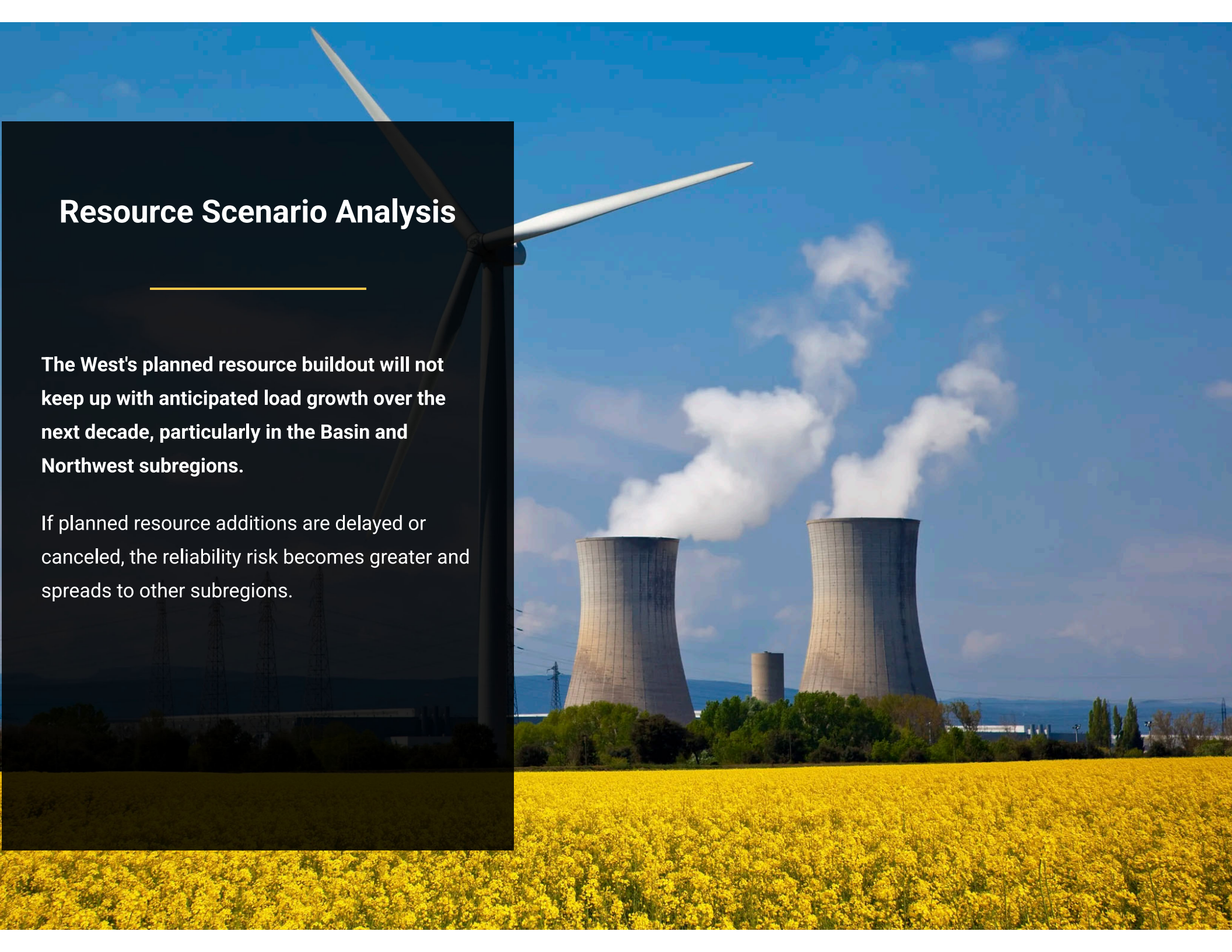
Western Interconnection Subregional Resource Adequacy Risks



Resource Scenario Analysis

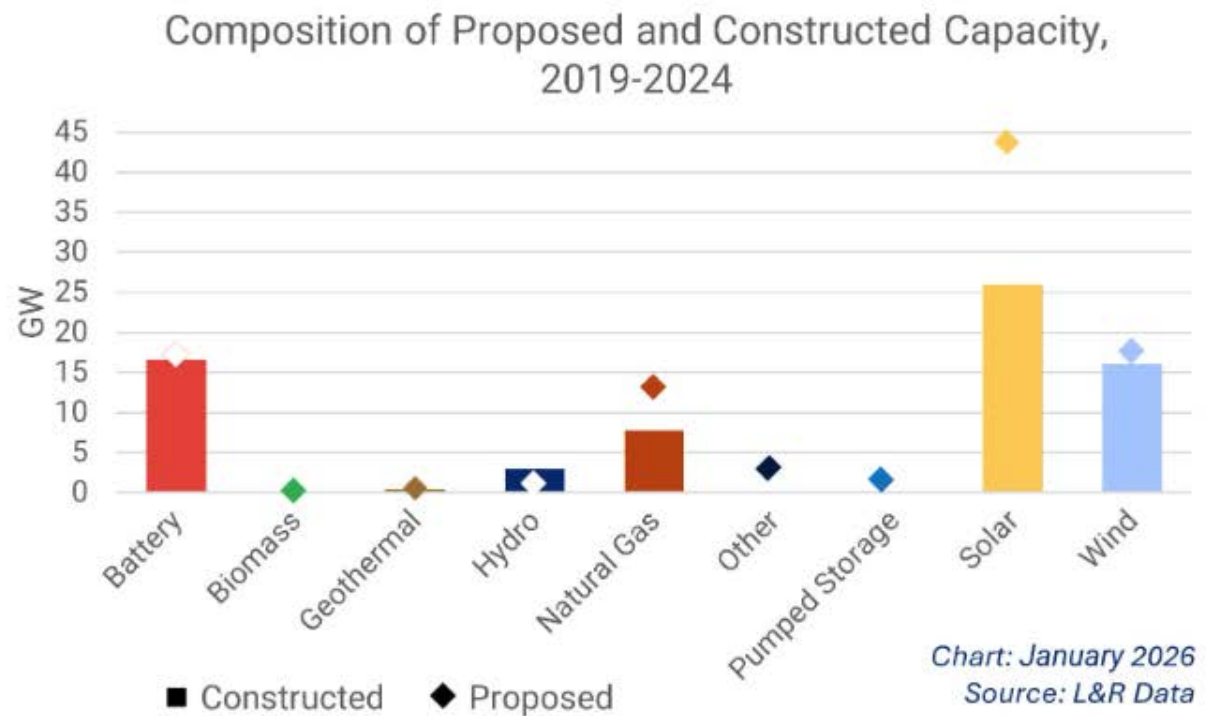
The West's planned resource buildout will not keep up with anticipated load growth over the next decade, particularly in the Basin and Northwest subregions.

If planned resource additions are delayed or canceled, the reliability risk becomes greater and spreads to other subregions.



Resource Buildout

Entities in the Western Interconnection plan to add 177 GW of new resources over the next decade. Historically, the number of new resources built according to plan and on time has varied. WECC's analysis found that in 2024, 80% of planned resources came online as scheduled. In 2023, approximately 53% of planned resources were added on time, and the three-year average (2022–2024) of resources that become operational in the year planned is 67%. Even though the planned capacity additions are significant, it is unlikely that everything planned will be built as planned, creating the chance of a shortfall.



Resource Scenarios

To assess the impact of failing to add generation as planned, WECC evaluated four scenarios **i** :

- All planned resources are built on time
- 95% of planned resources are built on time
- 85% are built on time
- 67% are built on time

All Additions Scenario

Even if all planned additions are completed and operational on time, WECC's analysis found loss of load every year beginning in 2029 and continuing through the end of the decade for a total of 463 LOLH **i** over the 10-year period studied. Two subregions saw loss of load in this scenario; as a result, they are at Elevated Risk for resource adequacy shortfalls over the coming decade:

- Northwest: 445 LOLH over 10 years
- Basin: 18 LOLH

95% Scenario

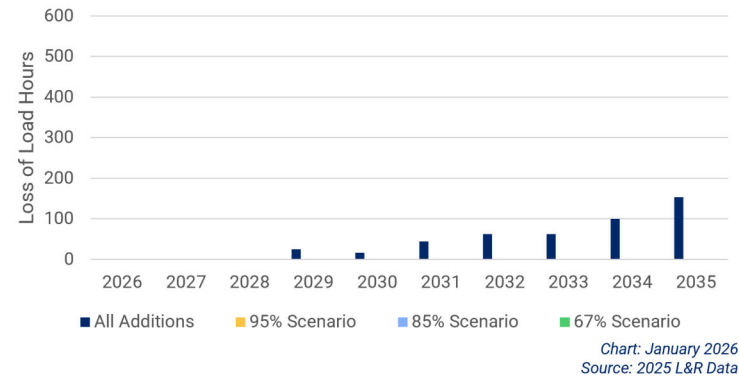
In this scenario, there was slightly more loss of load than in the All Additions Scenario, as expected: 568 hours vs. 463 hours.

- Northwest: 525 LOLH
- Basin: 43 LOLH

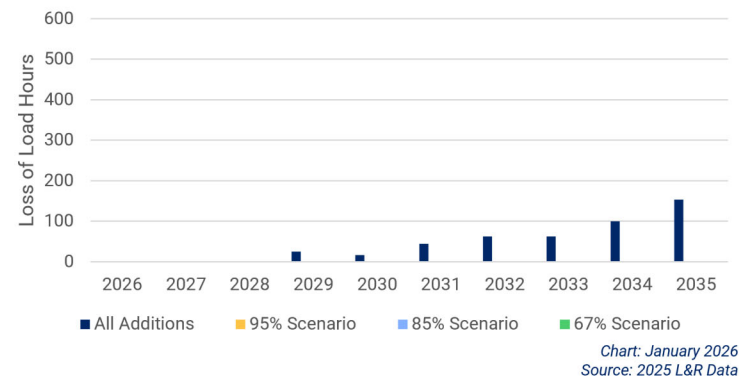
85% Scenario

If 85% of resources are built on time, WECC's analysis found 873 loss of load hours over the decade.

Comparison of Resource Buildout Scenarios



Comparison of Resource Buildout Scenarios



See [Western Assessment Supplemental Information](#) for more information about the scenarios.

To assess the impact of failing to add generation as planned, WECC evaluated four scenarios ❶ :

- All planned resources are built on time
- 95% of planned resources are built on time
- 85% are built on time
- 67% are built on time

Resource Scenarios

To assess the impact of failing to add generation as planned, WECC evaluated four scenarios ❶ :

- All planned resources are built on time
- 95% of planned resources are built on time
- 85% are built on time
- 67% are built on time

In this year's Western Assessment, WECC uses the term "loss of load hours" instead of the term used in previous assessments, "demand at risk hours." This change was made to align WECC's terminology with that used by NERC. The terms have the same meaning, which is that there is a risk of load loss under certain circumstances.

and operational on time, WECC's analysis found loss of load every year beginning in 2029 and continuing through the end of the decade for a total of 463 LOLH ❶ over the 10-year period studied. Two subregions saw loss of load in this scenario; as a result, they are at Elevated Risk for resource adequacy shortfalls over the coming decade:

- Northwest: 445 LOLH over 10 years
- Basin: 18 LOLH

- Northwest: 706 LOLH
- Basin: 163 LOLH
- Rocky Mountain: 4 LOLH

67% Scenario

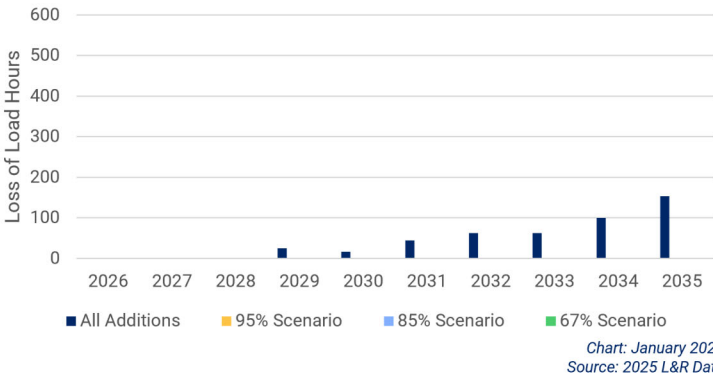
If only 67% of resources are built as planned over the coming decade, 2,144 hours may be at risk for loss of load across five subregions:

- Northwest: 1,294 LOLH
- Basin: 711 LOLH
- Rocky Mountain: 83 LOLH
- Mexico: 52 LOLH
- California: 4 LOLH

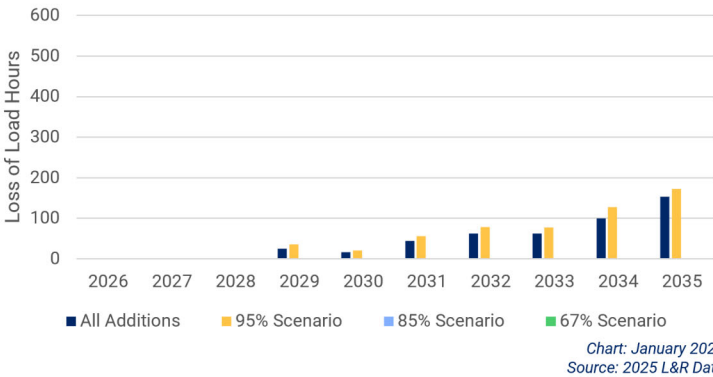
Key Takeaway

If resources are added as planned, loss of load may be limited to the Basin and Northwest subregions. However, if planned resource additions are delayed or cancelled, other subregions could also be at risk. In addition, 80% of the planned resource additions in Basin and Northwest, and more than half in Southwest, are categorized as Tier 3 resources. Tier 3 resources are speculative, making it a risk to rely heavily on them to cover load growth.

Comparison of Resource Buildout Scenarios



Comparison of Resource Buildout Scenarios



- Mexico: 52 LOLH
- California: 4 LOLH

Key Takeaway

If resources are added as planned, Northwest subregions. However, if other subregions could also be at risk. In addition, 80% of the planned resource additions in Basin and Northwest, and more than half in Southwest, are categorized as Tier 3 resources. Tier 3 resources are speculative, making it a risk to rely heavily on them to cover load growth.

Tier 1 resources are under construction and expected to be complete and available for the year being studied.

Tier 2 resources are under contract but have yet to begin construction. These resources may be operational by the year being studied.

Tier 3 resources range from generic placeholder resources that an entity has less certainty about to more developed projects that, although the commission date is unknown and construction has not started, other details are known including capacity, type, and location information. The Western Assessment differs from other assessment in that it includes Tier 3 resources in its analysis.

Comparison of Resource Buildout Scenarios

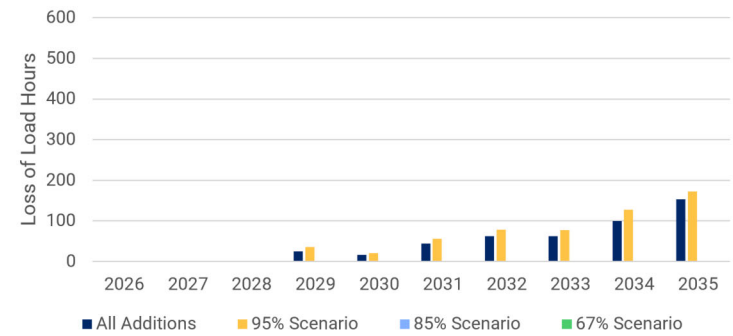


Chart: January 2026
Source: 2025 L&R Data

Comparison of Resource Buildout Scenarios

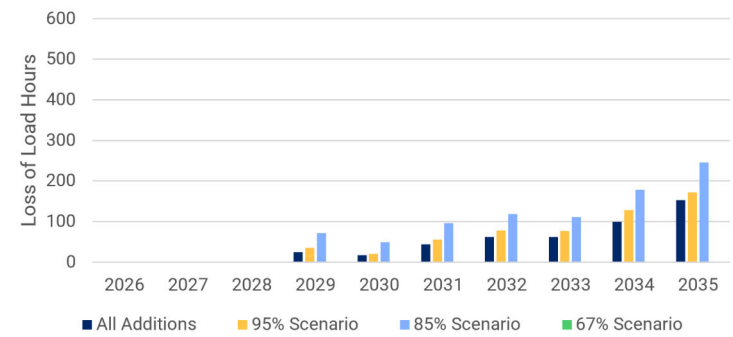
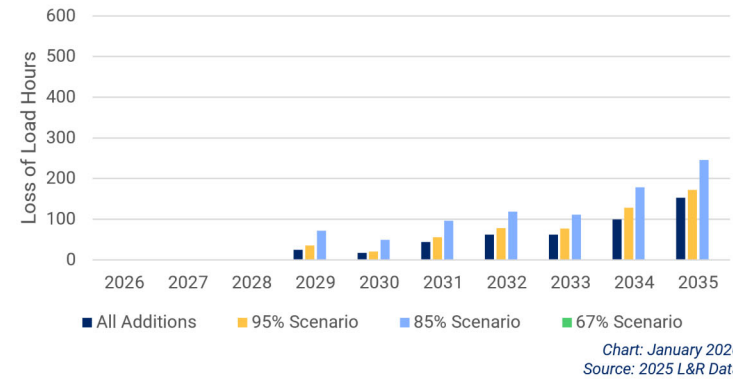
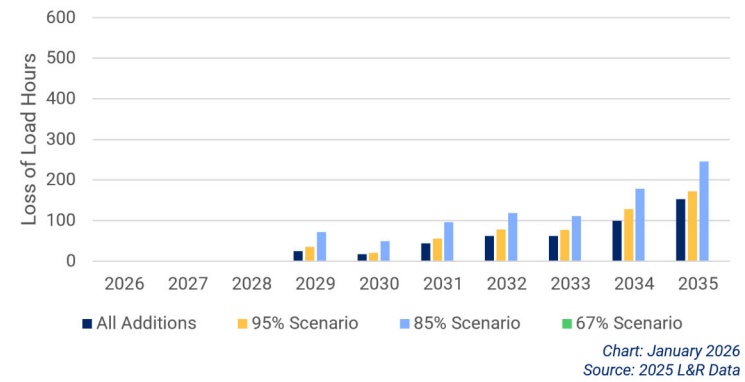


Chart: January 2026
Source: 2025 L&R Data

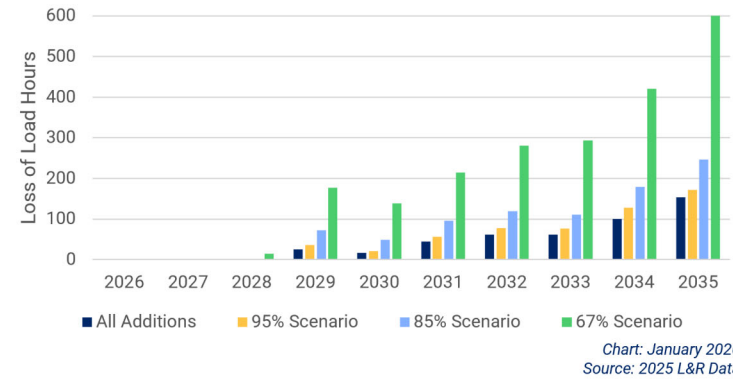
Comparison of Resource Buildout Scenarios



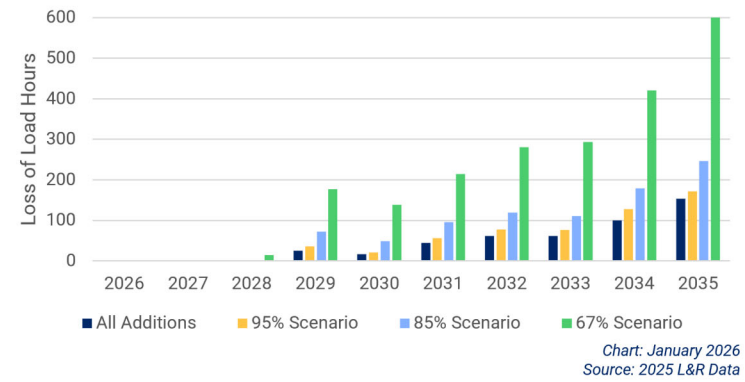
Comparison of Resource Buildout Scenarios



Comparison of Resource Buildout Scenarios



Comparison of Resource Buildout Scenarios



Comparison of Resource Buildout Scenarios

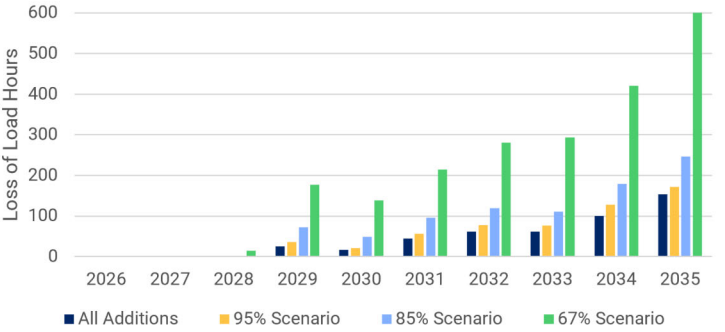
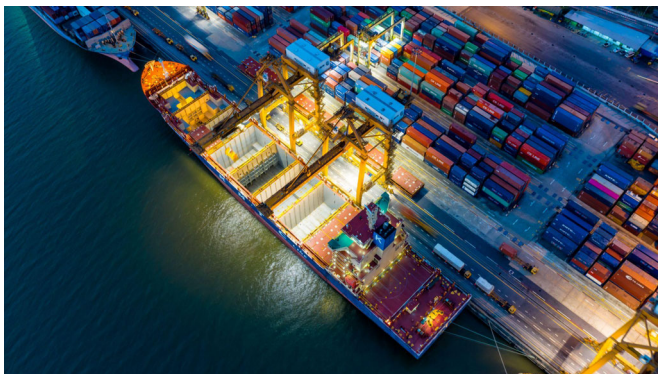


Chart: January 2026
Source: 2025 L&R Data

Risks to Planned Resource Additions



Supply Chain Disruptions

Supply chain issues that surfaced during the pandemic in 2020 continue to affect the industry. Wait time for transformers and circuit breakers is between two and four years, and the cost of both has increased significantly, according to the Balancing Authorities. Switchgears and substation switches have seen delays, too. In addition, trade issues and geopolitical tensions have raised concerns about supply chain reliability.



Interconnection Queue

The interconnection queue continued to grow in 2024 and into 2025. On average, it took five years for a project built in 2023 to go from requesting an interconnection study to commercial operation ⁱ. That is up from three years in 2015 and under two years in 2008. Although not all projects in the queue are built, capacity in an interconnection queue can be an indication of the magnitude of growth. Nationwide, the capacity ⁱ in the queue reached 2,600 GW in 2023, more than double the installed capacity.

Interconnection Queue

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Lawrence Berkeley National Laboratory report ve years for a project buil
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Siting Delays

Restrictions, including outright bans on siting renewable energy facilities, and controversy over specific energy infrastructure projects have become more common across the U.S.  . By the end of 2024, at least 459 counties and municipalities across 44 states had adopted restrictions on siting renewables. That is an increase of 16% in one year. The report also identified 498 projects in 49 states that faced significant opposition, a 32% increase.

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[Columbia Law School report](#)

Resource Changes

While 177 GW of new resources seems sufficient to cover 31 GW of projected new load over the next decade, 90% of those resources are inverter-based resources (IBR).

These new resources, along with the retirements planned through 2035, continue the rapid evolution of the resource mix away from traditional dispatchable resources to more weather-dependent resources.



Inverter-based Resources

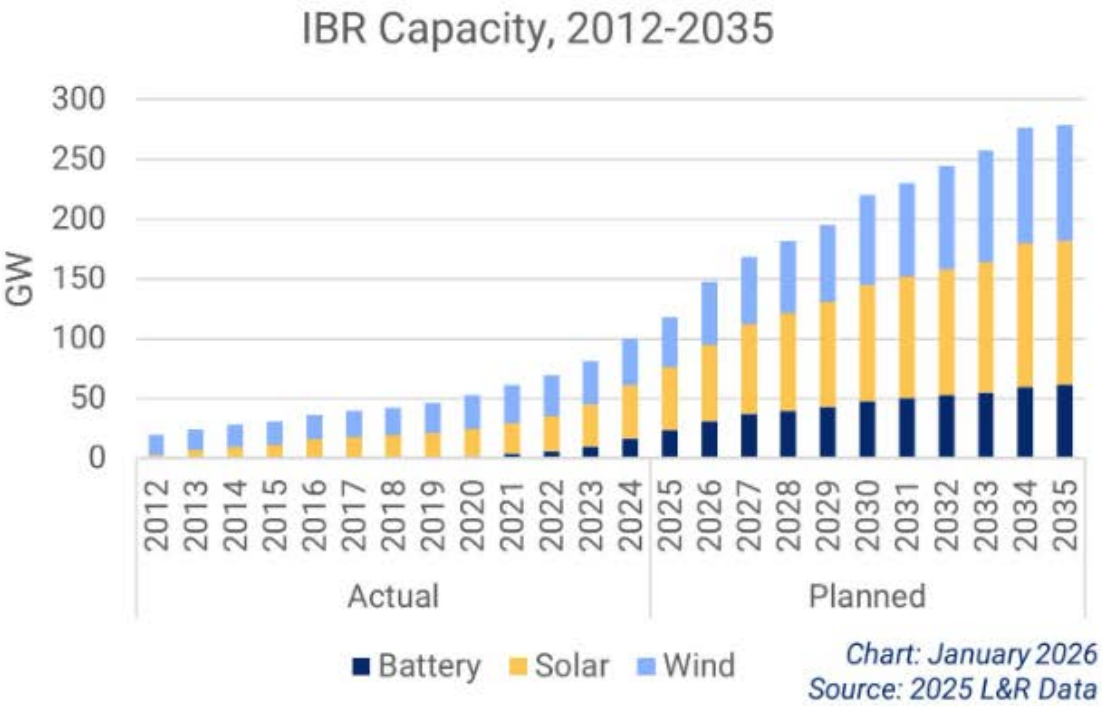
Of the 177 GW in planned resource additions over the coming decade, 90% are IBRs:

- 68 GW of solar capacity
- 55 GW of wind capacity
- 37.5 GW of battery storage capacity ⓘ

Inverter-based Resources

Of the 177 GW in planned resource additions over the coming decade, 90% are IBRs:
Battery storage systems do not generate electricity. Instead, they harness the energy created by generation resources, often solar or wind. They are typically charged during off-peak hours to ensure energy is available during peak periods.

- 37.5 GW of battery storage capacity ⓘ



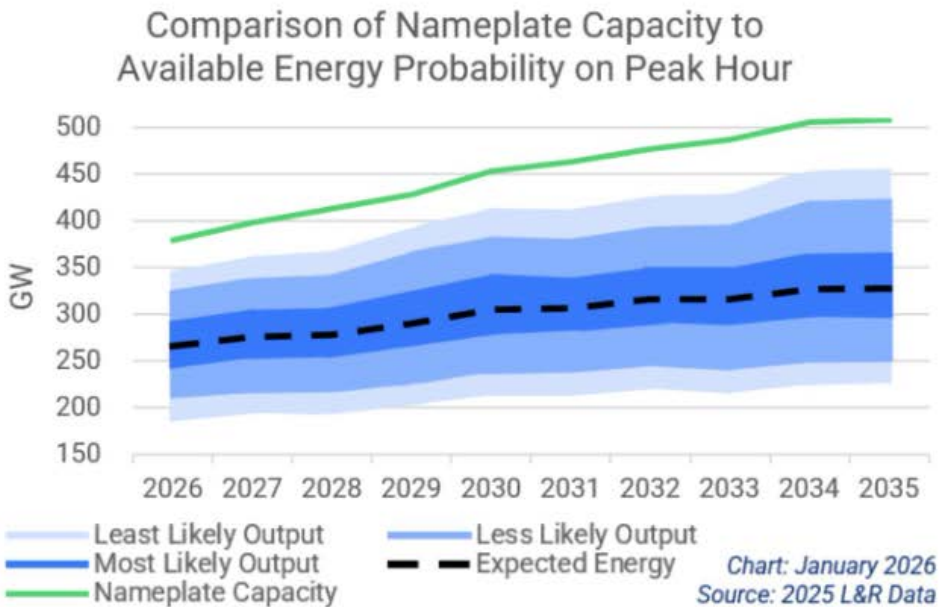
Increasing Variability

Given the significant increase in variable energy resources, efforts to determine resource adequacy must examine energy availability, as opposed to traditional resource planning in which nameplate capacity was the focus. IBRs do not generate electricity at nameplate capacity all the time, and their output can be weather-dependent. As a result, the expected energy of the resource mix is lower than its installed capacity. This gap will widen as more IBRs come online and dispatchable resources retire ⓘ.

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WECC has calculated the probability distributions for each resource in the generation fleet, showing the likelihood that a resource will produce electricity at levels other than what is expected. The probabilities form a band of variability where the most likely output is in the middle of the band and the least likely outputs are at the edge. The wider the band, the higher the system's variability and the more possibilities for planners and operators to consider. The size of the band increases over the coming decade in the Western Interconnection, an indication that variability is increasing on the system even as the West builds significant amounts of new generation.

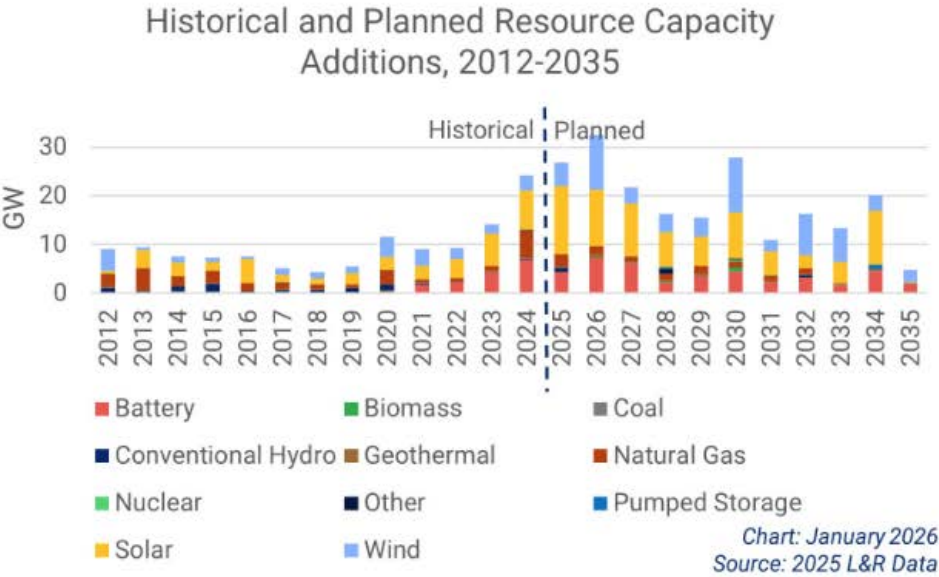


Resource Additions

Planned Resource Additions

Of the 177 GW expected to be added in the Western Interconnection over the decade, 32 GW are planned to be built in 2026. This is over three times the historical resource build average of 10 GW per year for 2015 through 2024. During that time, the greatest resource buildout occurred in 2024, with 24 GW of new resources built.

In addition to the IBRs planned, 9 GW of natural gas capacity is expected to be added over the decade, while 0.3 GW of nuclear is listed in current resource plans.



Subregional Breakdown ⓘ

Almost 70% of the planned resource additions are in two subregions: Southwest (70 GW) and California (49 GW).

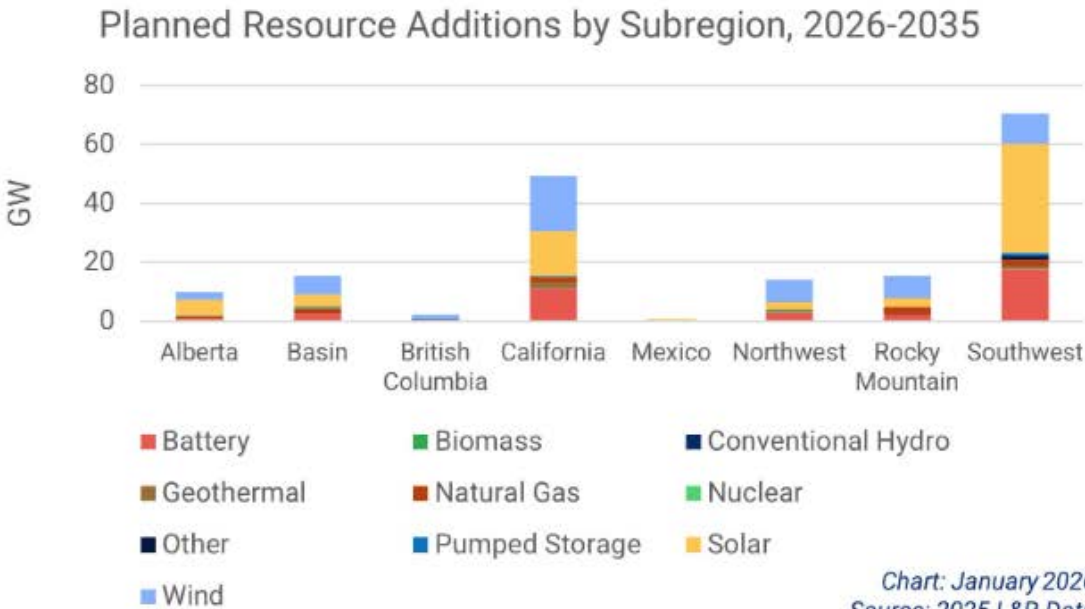
Basin, Northwest, and Rocky Mountain subregions each have about 15 GW in planned additions over the coming decade. The Mexico subregion has 600 MW of solar planned.

See [Western Assessment Supplemental Information](#) for more information on planned resource additions and retirements at the subregional level.

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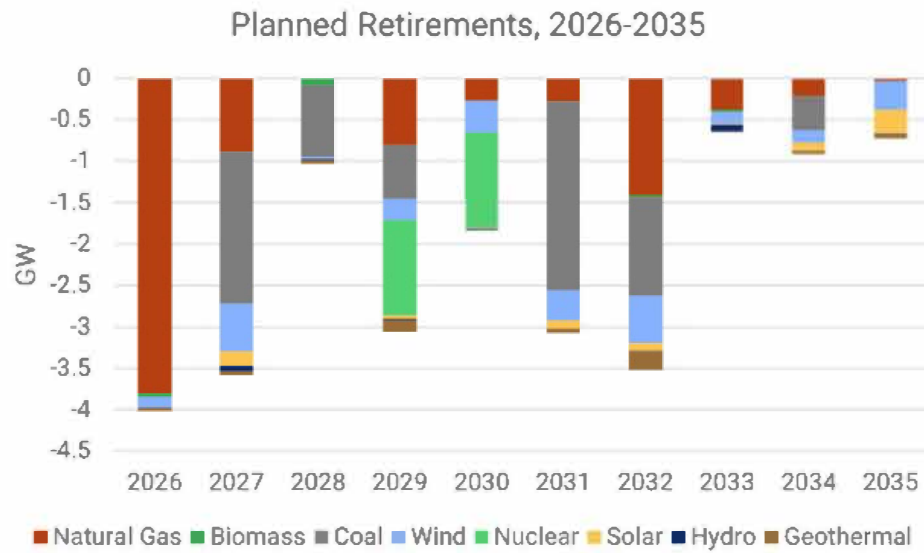
Basin, Northwest, and Rocky Mountain subregions each have about 15 GW in planned additions over the coming decade. The Mexico subregion has 600 MW of solar planned.



Resource Retirements

Planned Retirements

Entities plan to retire 22 GW of generation over the next 10 years. The vast majority is baseload generation such as coal (7 GW), natural gas (8 GW), and nuclear (2.3 GW, Diablo Canyon's two units, in 2029 and 2030).



Resource Mix

If all retirements and resource additions are made as planned, more than half of the total resource mix in 2035 will be IBRs. The expected energy output of the projected future resource mix is much lower than the nameplate capacity and fluctuates based on weather. This creates uncertainty, which increases resource adequacy risk.

Resource	% of resource mix today	% of resource mix in 2035
Battery	5%	12%
Coal	7%	2%
Geothermal	1%	1%
Hydro	23%	15%
Natural Gas	34%	23%
Nuclear	2%	1%
Other	1%	1%
Solar	14%	25%
Wind	12%	19%

Key Takeaway

Adding 32 GW of nameplate capacity in one year seems implausible as there is only one year in the last decade in which more than 20 GW were added.

Resource Mix, Year-end 2024

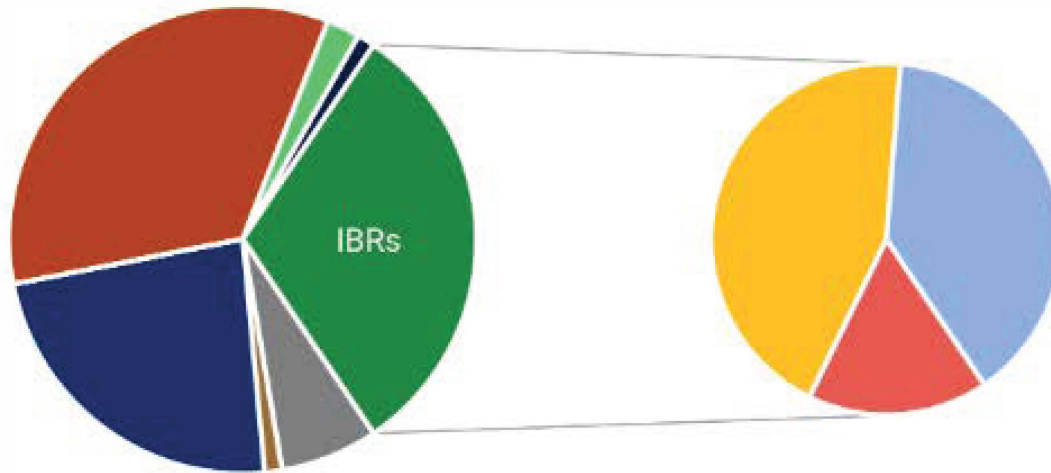


Chart: January 2026
Source: L&R Data

Resource Mix, Projected 2035

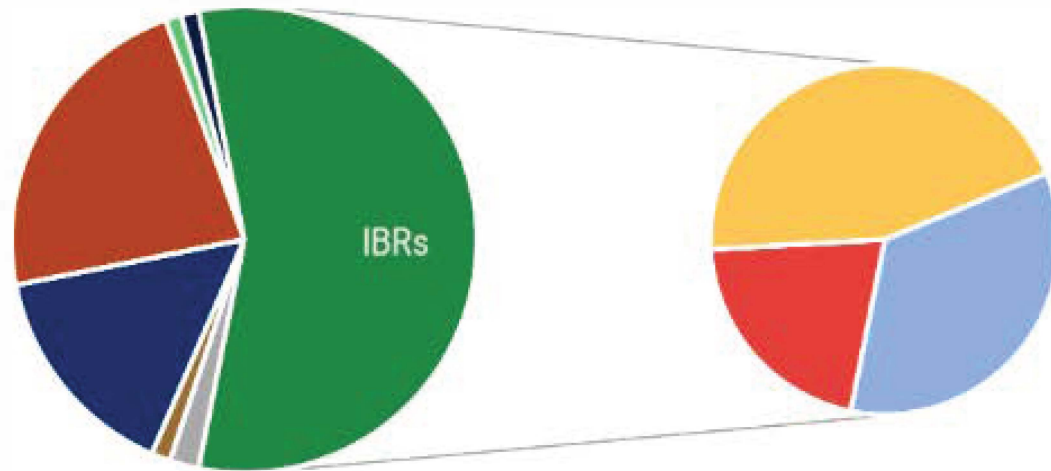
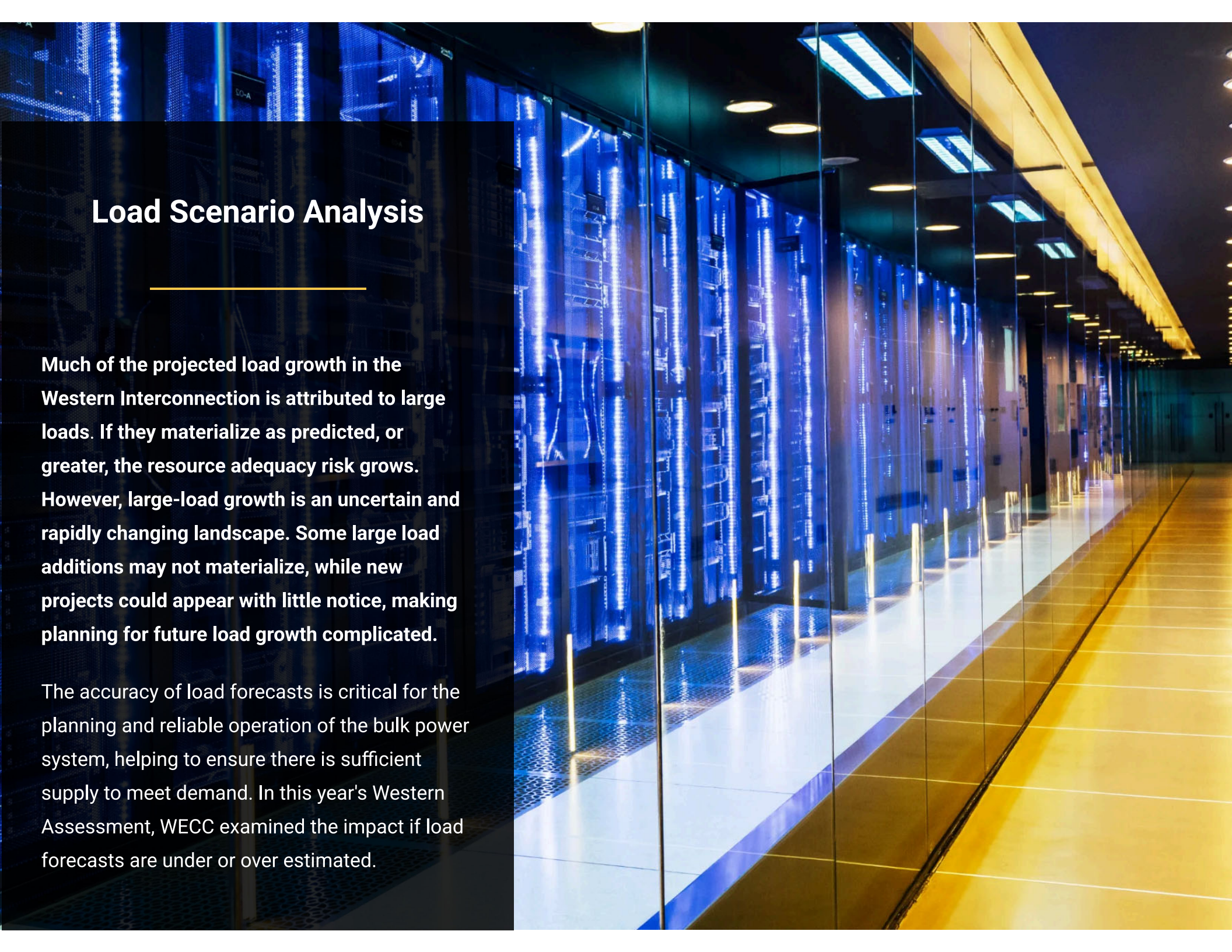


Chart: January 2026
Source: L&R Data



Load Scenario Analysis

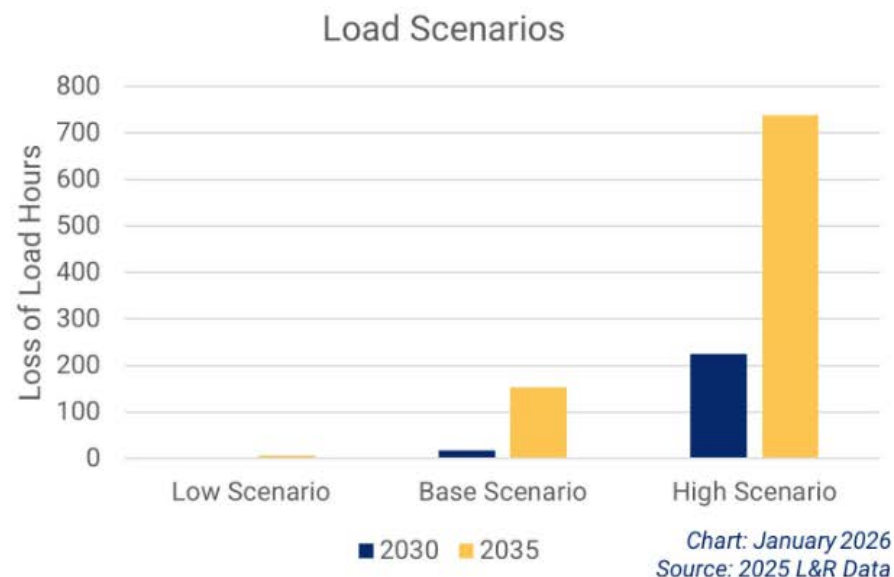
Much of the projected load growth in the Western Interconnection is attributed to large loads. If they materialize as predicted, or greater, the resource adequacy risk grows. However, large-load growth is an uncertain and rapidly changing landscape. Some large load additions may not materialize, while new projects could appear with little notice, making planning for future load growth complicated.

The accuracy of load forecasts is critical for the planning and reliable operation of the bulk power system, helping to ensure there is sufficient supply to meet demand. In this year's Western Assessment, WECC examined the impact if load forecasts are under or over estimated.

Uncertainty related to large loads is growing in the West, with questions about whether they will arrive as forecast, or beyond, or whether the projections over estimate their impact.

To account for this uncertainty, WECC examined three load scenarios ¹ in 2030 and 2035. In all the scenarios, it is assumed that 100% of the planned resources come online as submitted, including a large amount of speculative resources.

- Base Scenario: Examined demand growth as forecast
- Low Scenario: Load forecasts were adjusted downward to incorporate potential variance in projected demand growth
- High Scenario: Load forecasts were increased to incorporate some speculative large-load increases (not included in the base scenario), as provided by balancing authorities



Uncertainty related to large loads is growing in the West, with questions about whether they will arrive as forecast, or beyond, or whether the projections over estimate their impact. See [Western Assessment Supplemental Information](#) for details on these scenarios.

To account for this uncertainty, WECC examined three load scenarios ¹ in 2030 and 2035. In all the scenarios, it is assumed that 100% of the planned resources come online as submitted, including a large amount of speculative resources.

- Base Scenario: Examined demand growth as forecast
- Low Scenario: Load forecasts were adjusted downward to incorporate potential variance in projected demand growth
- High Scenario: Load forecasts were increased to incorporate some speculative large-load increases (not included in the base scenario), as provided by balancing authorities

Key Takeaway

The interconnection saw loss of load in the Base Scenario, and the loss of load hours increased significantly in the High Scenario. More notably, even if the demand is lower than expected and all resources are built as planned, resource adequacy risk is not completely mitigated.

Load Growth

Over the next decade the Western Interconnection is forecast to experience significant load growth due to drivers like electrification, population increases, and large load expansion.

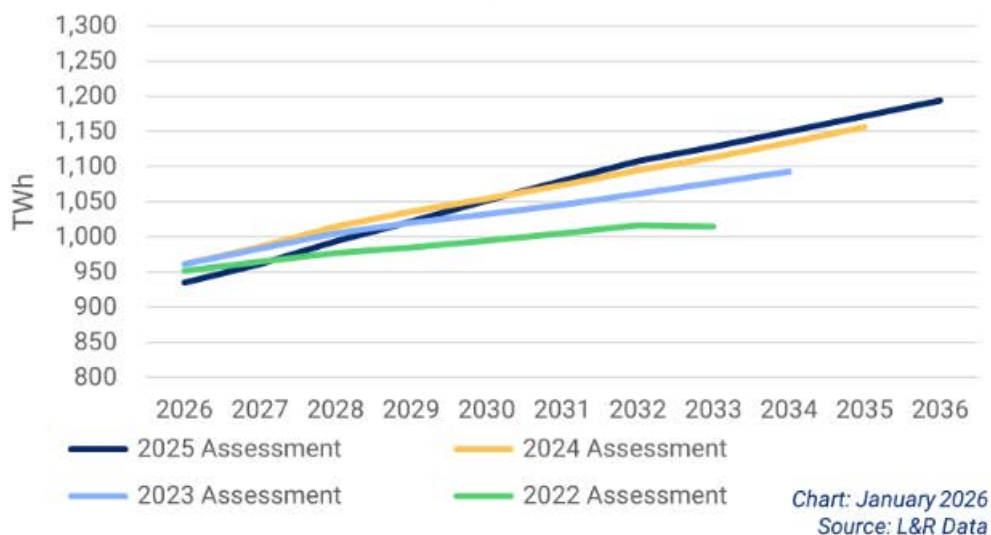


Annual Demand

Demand for electricity across the Western Interconnection is expected to grow 25% over the next 10 years, with two of the eight subregions projected to see increases of more than 40%. Four other subregions are projected to see demand increase over 20%. A year ago, load forecasts indicated a 20% increase in demand over the decade.

Annual Demand

Annual Demand Projection Comparison

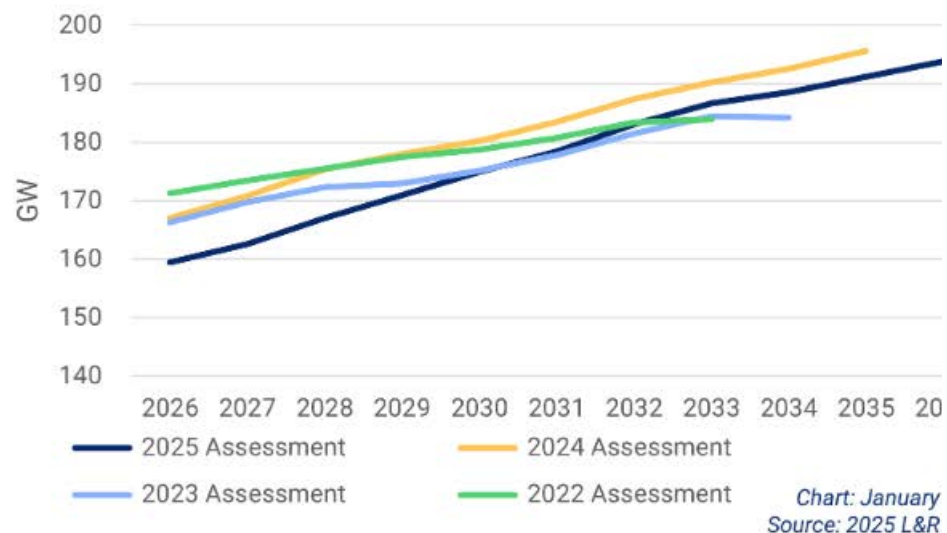


Peak Demand

Peak demand in the Western Interconnection is expected to grow 20% over the next decade, from 160 GW in 2026 to 191 GW in 2035. Peak demand values, while projected to increase over the next 10 years, are not as high as projected in 2024. Several subregions are projected to see peak demand grow significantly more than the interconnection-wide average.

Peak Demand

Peak Demand Projection Comparison



Subregion	10-year Demand Growth Projection	Average Annual Growth Rate
Alberta	8 TWh (9%)	1%
Basin	20 TWh (26%)	2%
British Columbia	5.5 TWh (8%)	1%
California	69 TWh (26%)	2%
Mexico	9 TWh (45%)	4%
Northwest	47 TWh (24%)	2%
Rocky Mountain	21 TWh (27%)	2%
Southwest	67 TWh (42%)	4%

Subregion	10-year Peak Demand Growth Projection	Average Annual Growth Rate
Alberta	1 GW (8%)	1%
Basin	3 GW (18%)	2%
British Columbia	.4 GW (3%)	.3%
California	12 GW (21%)	2%
Mexico	1.6 GW (41%)	4%
Northwest	7 GW (21%)	2%
Rocky Mountain	3 GW (23%)	2%
Southwest	10 GW (29%)	3%

Key Takeaway

Load forecasts continue to show significant growth over the next decade following similar projections in the 2024 Western Assessment. While utilities must ensure they have enough energy to meet projected load, load forecasting certainty is not the same as it was several years ago because of speculative large loads, primarily data centers and AI. It may be necessary for utilities to change the way they forecast demand growth.

Methods & Data

- This year's Western Assessment uses eight new subregional boundaries that better align with operational and planning realities, and are consistent with other WECC assessments.
 - This assessment uses Loads & Resources data provided by the Balancing Authorities in early 2025.
 - For more information on the methodology used in the scenarios, a glossary, and profiles of the subregions, read the [2025 Western Assessment Supplemental Information](#).
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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-184
2025 WARA Supplemental Information

Transfers



2025 Western Assessment Supplemental Information

Introduction

WECC's annual Western Assessment of Resource Adequacy provides a high-level examination of resource-adequacy-related risks to the reliability of the Western Interconnection over the next 10 years. Through an energy-based probabilistic approach, WECC examines the risks across the entire interconnection and eight subregions. This work is intended to help stakeholders target specific areas and topics for deeper evaluation and mitigation. The 10-year assessment period for this year's Western Assessment is 2026 through 2035.

This supplemental material provides a more in-depth look at the eight subregions that make up the Western Interconnection, with information on resource portfolio, demand projections, planned resource additions and retirements, and how the subregion fared in WECC's analysis. All times listed are Pacific Time.

Scenarios

WECC performed six scenarios in the 2025 Western Assessment, using data provided by WECC members as of the end of 2024. This information included planned resource additions and retirements over the coming decade, as well as demand forecasts for the 10-year assessment period.

The “All Additions” scenario evaluated resource adequacy assuming all planned resource additions and retirements come to fruition, while three scenarios reduced the planned resource additions. Resource additions in these scenarios were based on capacity decreases of 5%, 15%, and 33%, respectively. These scenarios are called the “95% Additions,” “85% Additions,” and the “67% Additions” scenarios. The reduction in resource additions was applied evenly to each resource type and subregion. Demand forecasts in these scenarios were unaltered for the assessment period and reflect annual and peak demand projections as of year-end 2024.

The remaining two scenarios focused on demand in the years 2030 and 2035. The “High Load Scenario” incorporates large load customer demand that was not included in original demand forecasts due to uncertainty in customer materialization. The additional demand from these customers is modeled as being present 24/7, year-round. Resource additions were not altered in the High Load scenario.

Large load demand added to the peak and annual demand forecasts in the High Load Scenario.

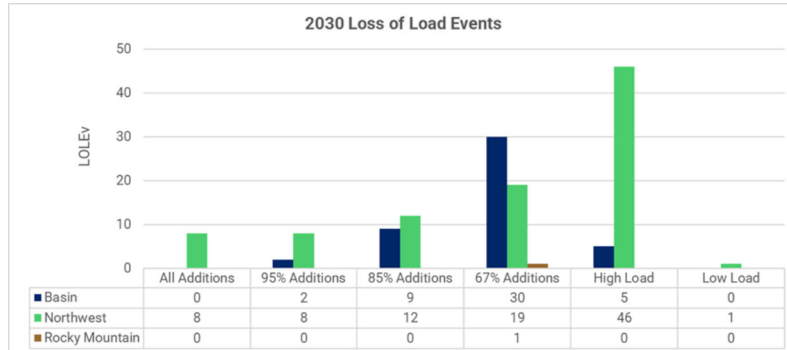
The “Low Load Scenario” applies percentage reductions to peak and annual demand forecasts in 2030 and 2035. The reductions are seasonal for the peak hour forecasts and applied evenly to the annual demand forecasts. The shoulder season reductions for the peak hour are an average of the summer and winter percentage reductions. The percentages chosen represent an approximation of the typical high-side forecasting error for peak and annual demand. They are shown below. Resource additions were not altered in the Low Load Scenario:

Reductions to peak and annual demand forecasts in the Low Load Scenario

Results

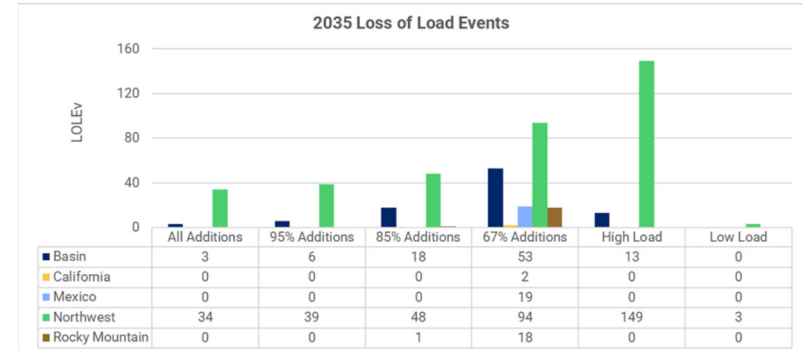
Resource adequacy metrics, such as loss of load events (LOLEv), loss of load hours (LOLH), expected unserved energy (EUE), and duration of loss of load events, were derived for each scenario by subregion and are provided below for years 2030 and 2035.

Loss of Load Events



LOLEVs by subregion and scenario for 2030

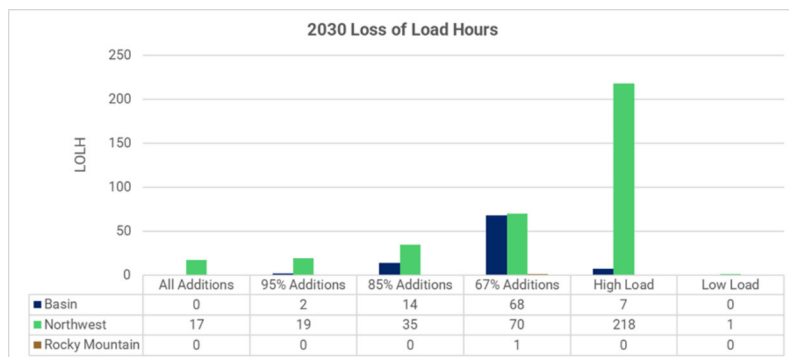
An LOLEv is a period during which system load cannot be served. The Northwest contains the greatest LOLEVs across all scenarios. Both Basin and the Northwest encounter LOLEVs as early as 2029 in the All Additions Scenario, however only the Northwest shows LOLEVs in 2030. When 3 GW of speculative large load demand is added to the Northwest subregion in the High Load Scenario, the Northwest's LOLEVs increase dramatically. It should also be noted that when demand is reduced in the Low Load Scenario, there is a singular LOLEv for the Northwest in 2030. This is noteworthy as the Low Load Scenario incorporates all planned resource additions. The Rocky Mountain subregion has one LOLEv in 2030 in the 67% Additions Scenario.



LOLEVs by subregion and scenario for 2035

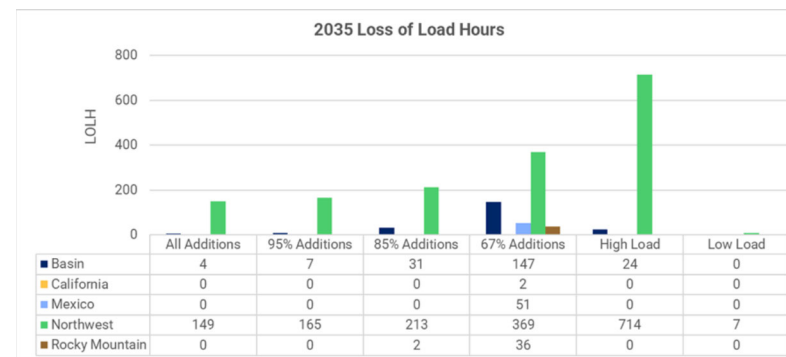
Examining the 2035 LOLEVs, California and Mexico show loss of load in the 67% Additions Scenario. California has one LOLEv in 2032 and 2033, and two LOLEVs in 2035. Mexico has one LOLEv in 2034 and 19 LOLEVs in 2035. The Rocky Mountain subregion shows 18 LOLEVs in 2035 in the 67% Additions Scenario and shows an LOLEv in 2034 and 2035 in the 85% Additions Scenario. The Northwest shows LOLEVs across all scenarios in 2035, with the greatest amount shown in the High Load Scenario. The High Load Scenario features over 3.5 GW of additional consumer demand for the Northwest subregion in 2035, driving this increase. The Northwest is also the only subregion showing LOLEVs in 2035 for the Low Load Scenario. Basin shows LOLEVs in all scenarios except the Low Load Scenario.

Loss of Load Hours



LOLHs by subregion and scenario for 2030

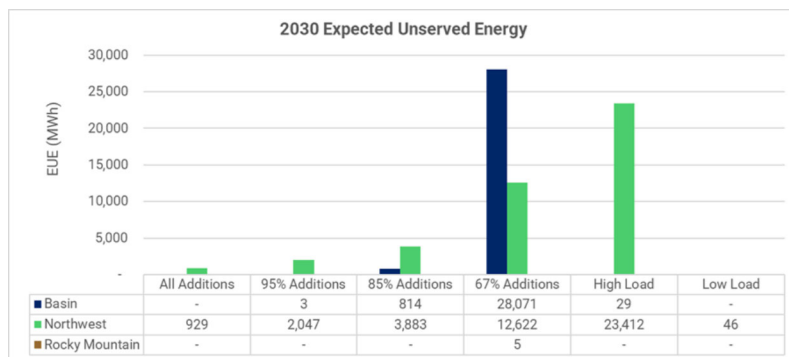
LOLHs are the number of hours a subregion's demand is projected to exceed generating capability. LOLHs for each scenario in 2030 are provided above. Results viewed through the lens of LOLHs are generally similar to those of LOLEVs, in that the Northwest and Basin subregions show most of the LOLHs. It is noteworthy in the 2030 67% Additions Scenario that Basin displayed more LOLEVs; however, the Northwest subregion shows greater LOLHs. This indicates the Northwest is generally experiencing longer LOLEVs. In the 2030 67% Additions Scenario, the average length of time per LOLEv in the Northwest is close to four hours, whereas, for Basin, LOLEVs average about two hours. The Northwest shows over 200 LOLHs in the High Load Scenario with 46 LOLEVs, increasing the average length of LOLEv to almost five hours. Rocky Mountain has one LOLH in 2030 in the 67% Additions Scenario.



LOLHs by subregion and scenario for 2035

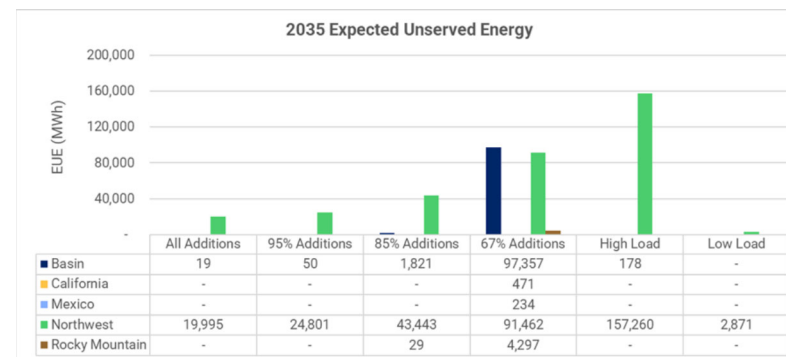
Comparing 2035 to 2030, LOLHs increase across the board in all scenarios. Basin and the Northwest show LOLHs in the All Additions Scenario, whereas Rocky Mountain has LOLHs in the 85% Additions Scenario. The Northwest shows over 700 LOLHs in the High Load Scenario, and similar to the 2030 High Load Scenario, averages approximately five hours per LOLEv. The Northwest also shows seven LOLHs in the Low Load Scenario. Basin shows 147 LOLHs in the 67% Additions Scenario spread over 53 LOLEVs, averaging about three LOLHs per LOLEv. California shows two LOLHs in the 2035 67% Additions Scenario, whereas Mexico shows 51 LOLHs. The 51 LOLHs for Mexico were spread over 19 LOLEVs, resulting in an average duration of about three hours per LOLEv.

Expected Unserved Energy



EUE by subregion and scenario for 2030

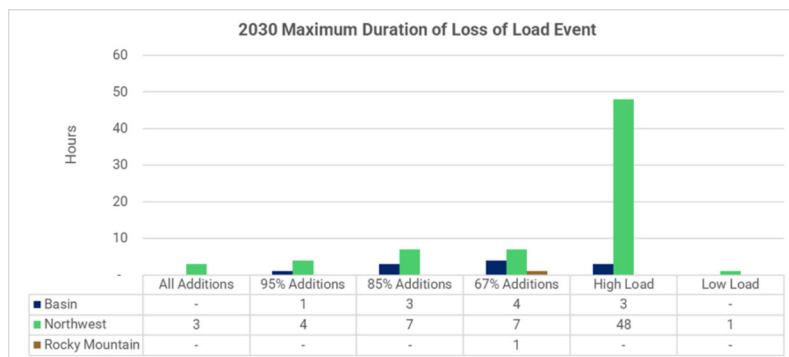
EUE is the anticipated demand that will not be served due to demand exceeding available energy. It is intended to provide a measure of energy shortfall. In the 67% Additions Scenario, Basin and the Northwest have nearly identical LOLHs; however, Basin's EUE was 28.1 GWh versus the Northwest's 12.6 GWh. Basin's hourly average EUE in the 2030 67% Additions Scenario is slightly over 410 MWh, whereas the Northwest's hourly average EUE in this scenario is closer to 180 MWh. As such, despite the Northwest having more frequent and longer LOLEVs, the magnitude of energy shortfall in those events is typically shallower than the LOLEVs in Basin. This trend reverses in the High Load Scenario in which Basin shows 29 MWh of EUE over seven LOLHs, whereas the Northwest shows 23.4 GWh of EUE over 218 LOLHs.



EUE by subregion and scenario for 2035

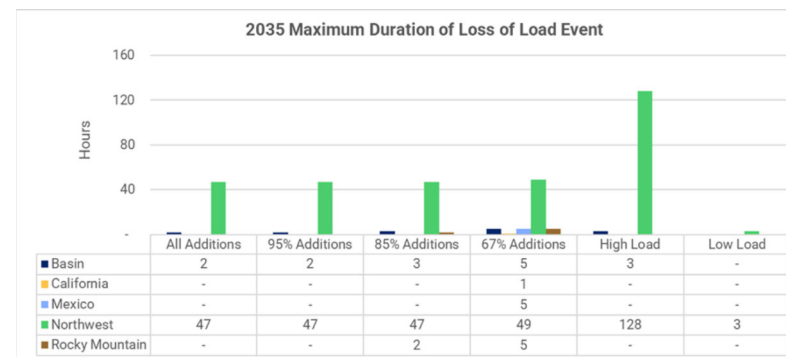
The 2035 EUE results indicate that the trends identified in 2030 are exacerbated by continued load growth. Basin shows 97.3 GWh of EUE in the 67% Additions Scenario over 147 LOLHs, which is an average of 660 MWh of EUE per LOLH. The Northwest shows 91.4 GWh of EUE over 369 LOLHs, averaging 248 MWh of EUE per LOLH. This again emphasizes that loss of load is anticipated to be a more frequent occurrence in the Northwest but by a smaller margin than experienced in the Basin subregion. Also in the 67% Additions Scenario, the Rocky Mountain subregion shows 4.3 GWh of EUE over 36 LOLHs, which is an average of 120 MWh per LOLH. In the High Load Scenario, the Northwest's EUE skyrockets to 157 GWh over 714 LOLHs. The LOLEVs for the Northwest subregion in the High Load Scenario effectively become longer, however result in smaller average EUE per LOLH (220 MWh) than experienced in the 67% Additions Scenario.

Duration



Maximum duration of LOLEs by subregion and scenario for 2030

Average duration of LOLEs is between one and five hours depending on the scenario and subregion. However, when the maximum duration of LOLEs is examined, the Northwest stands out. In the 2030 resource addition scenarios, Northwest LOLEs have a maximum duration of three to seven hours. However, in the High Load Scenario, the Northwest has an LOLEv that lasts 48 consecutive hours in January. Given the cold weather during January and the significant electrification of heating in the Northwest, this is a noteworthy risk.



Maximum duration of LOLEs by subregion and scenario for 2035

In 2035, the Northwest again stands out as the subregion with longest-lasting LOLEs. The resource addition scenarios all show at least one LOLEv that lasts between 47 and 49 hours. The High Load Scenario for the Northwest shows an LOLEv lasting 128 consecutive hours — equivalent to over five days of outage — in January. This is a significant concern given electricity is a primary fuel for residential heating in the Northwest.

Subregional Data

This section gives a subregional view of present and future resource portfolios, resource additions and retirements, demand forecasts, and loss of load metrics. Loss of load metrics are presented as heat maps that show seasonality, timing, frequency, and magnitude. The loss of load heat maps have been constructed for the years 2030 and 2035 for the All Additions, 67% Additions, and High Load scenarios.

Subregion: Alberta

The Alberta subregion spans the province, which has a population of approximately 5 million. Although its demand peaks in winter, an hour in summer 2024 was within 1.3% of its winter peak and four of the top seven hours were in the summer. There are an estimated 16,369 miles of transmission lines in this subregion.

Current resource mix

Natural gas dominates the resource mix in the Alberta subregion, with 61% of the installed capacity. Wind generation makes up 25% of the resource mix, while solar and hydro make up 8% and 4%, respectively.

2035 resource mix

If all generating resources included in current resource plans are built, in 2035 natural gas's share of the resource mix will decrease to 45%, while solar's share will increase to 23%. Battery storage is expected to grow from 1% of the resource mix to 3% in 2035.

Planned additions

The subregion is expected to add close to 10 GW of new generation over the coming decade, primarily solar (5 GW) and wind (3 GW).

Planned retirements

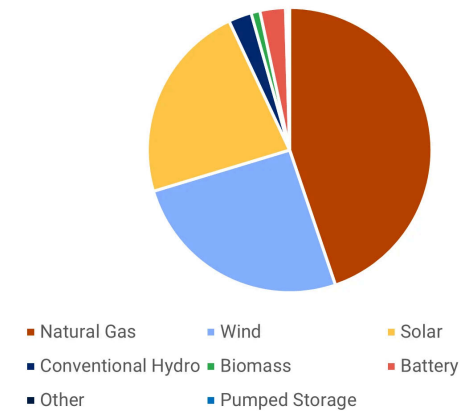
No retirements are planned in the Alberta subregion through 2035 according to current resource plans.

Annual and peak demand

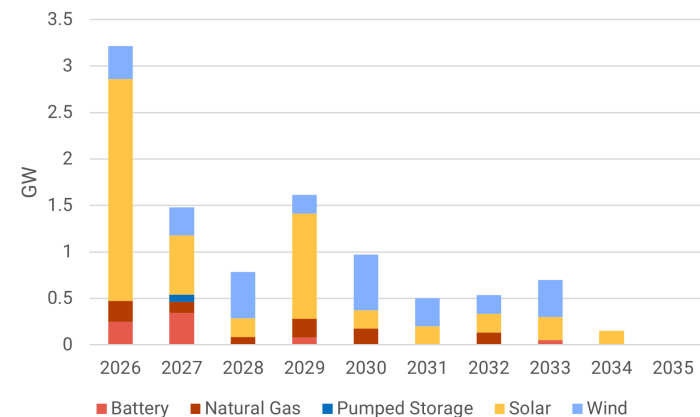
Demand in the subregion is forecast to grow by 9% over the coming decade, while peak demand is projected to increase 8%. A major driver of demand growth in this subregion is transportation electrification.

Loss of Load

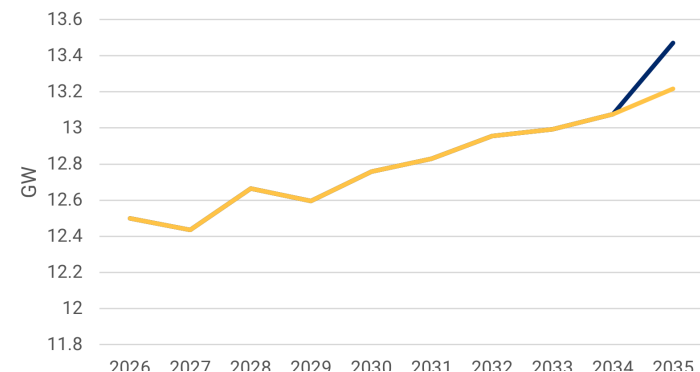
Alberta saw no loss of load in any of the scenarios.



Resource mix in 2035, if all planned additions are built



Planned resource additions, 2026-2035



Projected peak demand, 2026-2035

Subregion: Basin

Basin is a summer-peaking subregion that includes Utah, southern Idaho, and part of western Wyoming. The population of this area is approximately 5.4 million. There are an estimated 15,910 miles of transmission lines in this subregion.

Resource mix

Basin's resource portfolio as of year-end 2024 is primarily coal and natural gas. The two make up 51% of nameplate capacity in the subregion. Wind and solar make a combined total of 36% of the resource mix, with the remaining portfolio primarily composed of hydro resources.

2035 resource mix

Over the next decade, wind and solar additions are anticipated to shift the resource mix to 51% variable energy resources (VER) and 33% thermal resources. BESSs are anticipated to make up 8% of the resource mix in the subregion by year-end 2035.

Planned additions

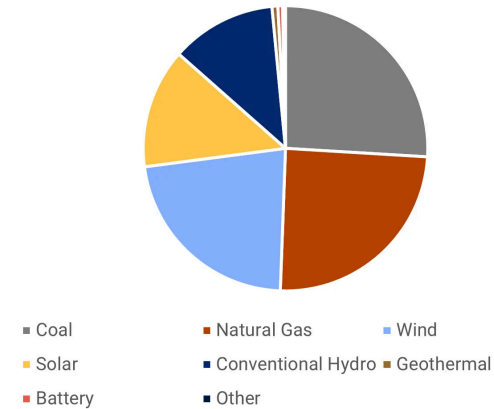
Basin has over 15 GW of resource additions planned from 2026 through 2035. Slightly over 40%, or 6 GW, of the planned additions are wind resources, and over 25%, or 4 GW, are solar resources. BESS makes up 18%, or 3 GW, of the resource additions in the subregion, with half of the BESS capacity planned to be added in 2026.

Planned retirements

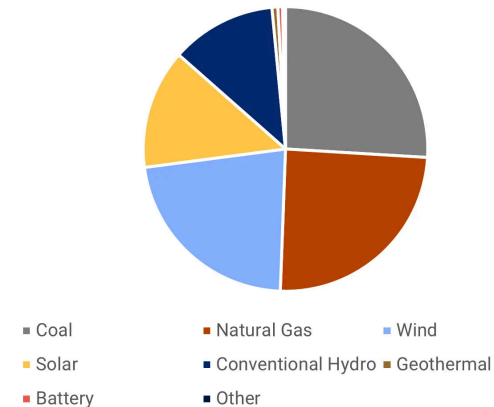
Approximately 2.2 GW is planned for retirement through 2035, almost half of which are coal (980 MW). 700 MW of wind resources are planned for retirement over the decade, along with 360 MW of natural gas generation.

Annual and peak demand

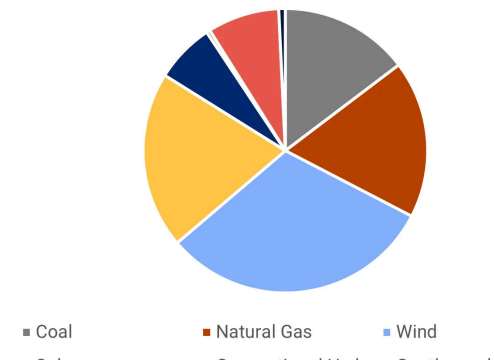
Demand in the subregion is forecast to grow by almost 26% over the coming decade, while peak demand is projected to increase 18%. Interconnection-wide annual energy load is projected to increase by 25%, and peak energy by 20%. Main contributors to demand growth in the Basin subregion are data centers and semiconductor manufacturing.



Resource mix, year-end 2024



Resource mix, year-end 2024



Loss of Load

The heat maps below highlight the loss of load in several scenarios.

The heat maps for 2030 and 2035 67% Additions Scenario provide the clearest picture of the risk hours for the subregion. Basin is summer-peaking with peak load generally occurring between 3 p.m. and 4 p.m. However, during the summer, heat can linger after the peak hour, resulting in elevated demand lasting through the evening. Basin’s planned resource additions are primarily wind and solar. The summer is not generally as windy as winter or shoulder seasons, and solar begins to dissipate in the evening. The elevated loads, coupled with a reduction in solar output during the evening hours, and general variability of wind, results in Basin showing the greatest risk to resource adequacy between 5 p.m. and 10 p.m. during July and August. Summer evenings also correspond with elevated demand in the Rocky Mountain and California subregions, lessening import availability from these subregions to Basin and further contributing to the loss of load.

Basin: All Additions 2035 LOLH		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
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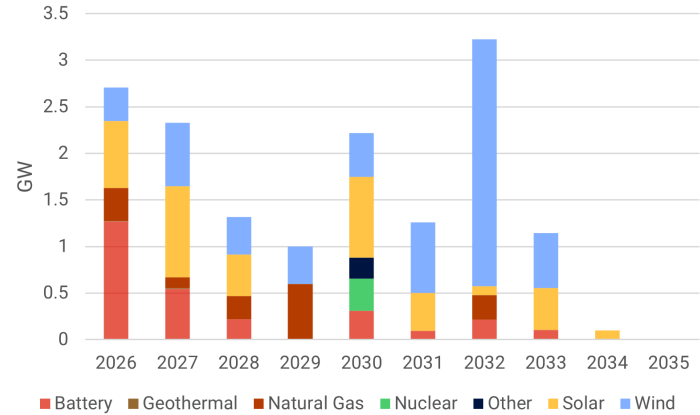
LOLH by month and hour for Basin in the 2035 All Additions Scenario

Basin: All Additions 2035 EUE (MWh)		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	9	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

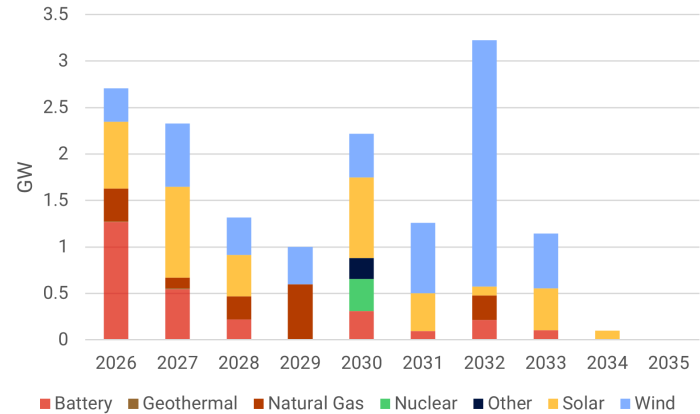
EUE by month and hour for Basin in the 2035 All Additions Scenario

Basin: 67% Additions 2030 LOLH		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
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7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	3	11	10	1	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	6	8	4	2	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	7	5	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
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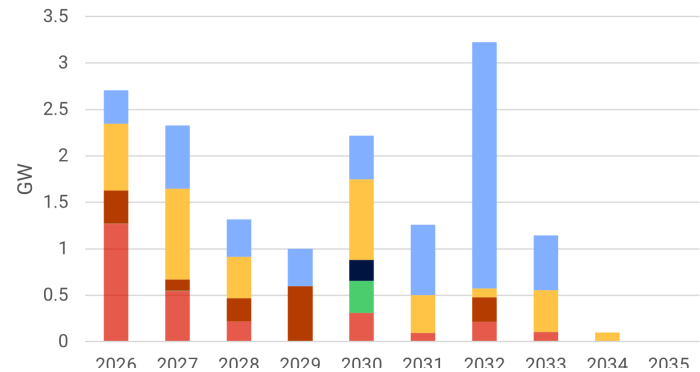
Resource mix in 2035 if all planned resources are built



Planned resource additions, 2026-2035



Planned resource additions, 2026-2035



LOLHs by month and hour for Basin in the 2030 67% Additions Scenario

Basin: 67% Additions 2030 EUE (MWh)		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	821	109	-	-	-	
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	230	7,932	2,818	1	-	-	
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	4,621	7,968	2,798	48	-	-	
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8	852	262	-	-	-	-	
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

EUE by month and hour for Basin in the 2030 67% Additions Scenario.

Basin: 67% Additions 2035 LOLH		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	5	5	1	-	-	
8	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	2	11	18	16	7	-	-	
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	14	18	8	5	1	-	
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7	10	10	3	-	-	-	
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
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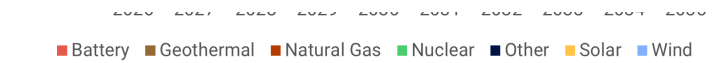
LOLHs by month and hour for Basin in the 2035 67% Additions Scenario

Basin: 67% Additions 2035 EUE (MWh)		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	290	4,709	1,541	3	-	-	
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5	740	24,700	13,825	188	-	-	
9	-	-	-	-	-	-	15	-	-	-	-	-	-	-	-	-	-	18	10,626	19,406	8,615	1,797	2	-	
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	30	5,621	5,099	127	-	-	-	
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
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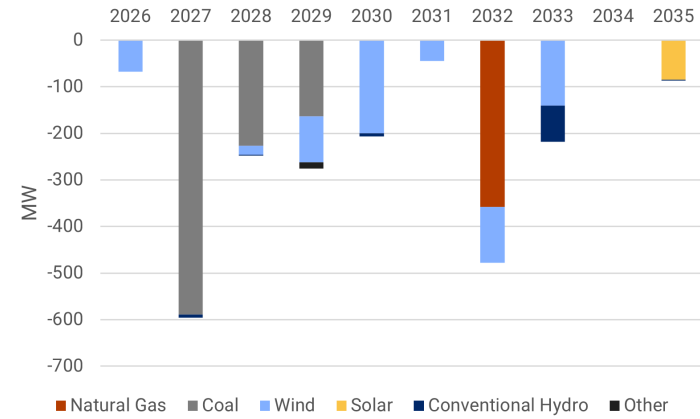
EUE by month and hour for Basin in the 2035 67% Additions Scenario

Basin: High Load 2030 LOLH		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	2	1	-	-	-	
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

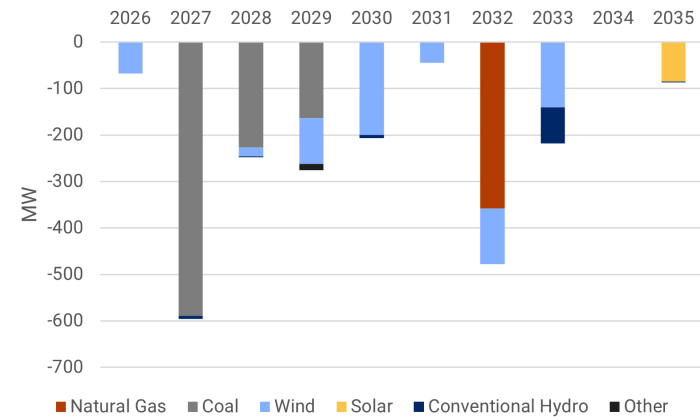
LOLHs by month and hour for Basin in the 2030 High Load Scenario



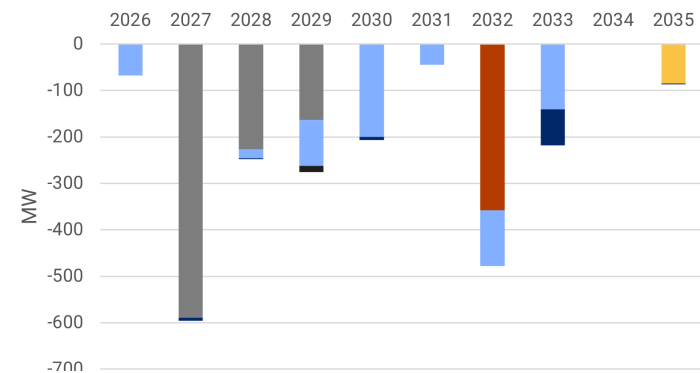
Planned resource additions, 2026-2035



Planned retirements, 2026-2035



Planned retirements, 2026-2035



Basin: High Load 2030 EUE (MWh)		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	15	3	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

EUE by month and hour for Basin in the 2030 High Load Scenario

Basin: High Load 2035 LOLH		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1	1	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	8	5	1	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	2	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
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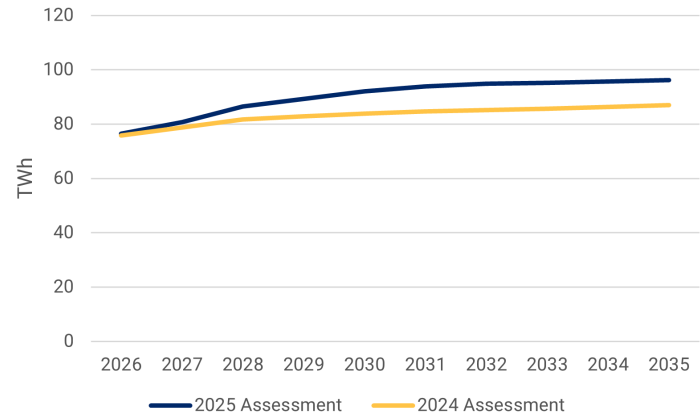
LOLHs by month and hour for Basin in the 2035 High Load Scenario

Basin: High Load 2035 EUE (MWh)		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	30	13	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5	82	22	1	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

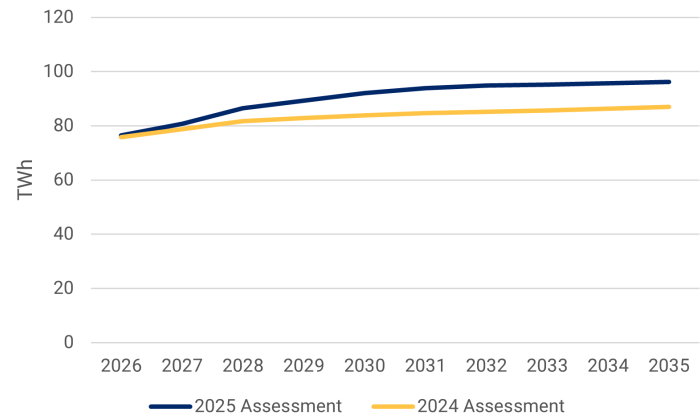
EUE by month and hour for Basin in the 2035 High Load Scenario



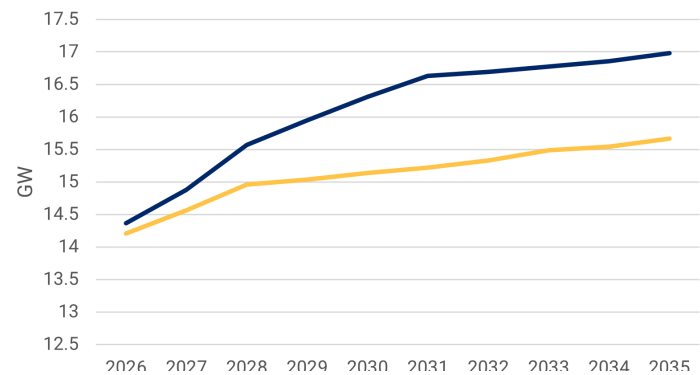
Planned retirements, 2026-2035



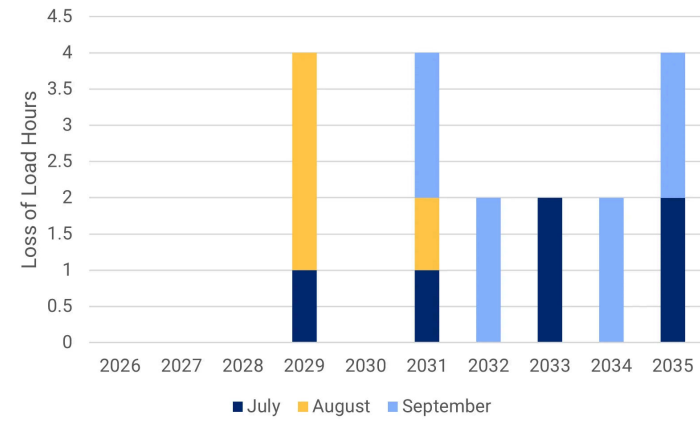
Projected annual demand, 2026-2035



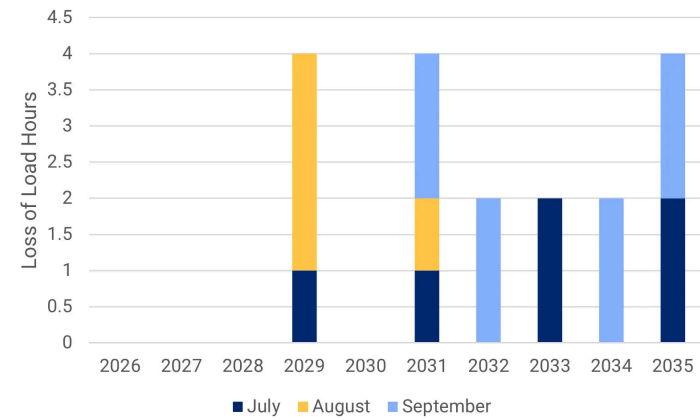
Projected annual demand, 2026-2035



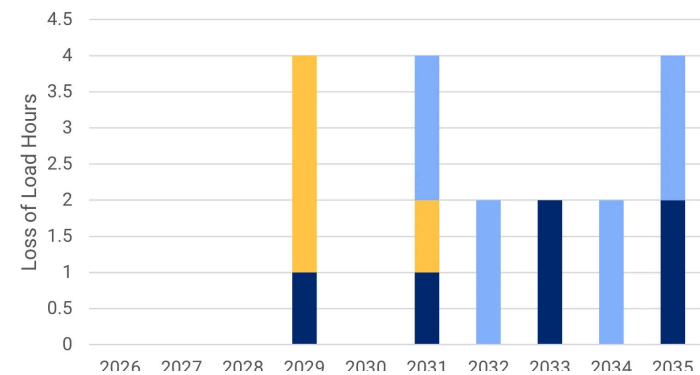
Projected peak demand, 2026-2035



All additions scenario



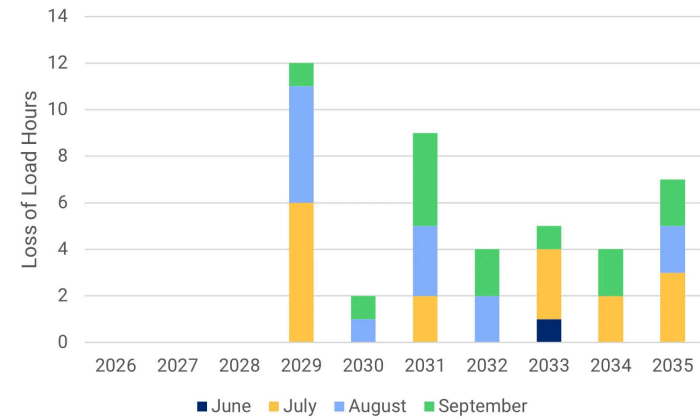
All additions scenario



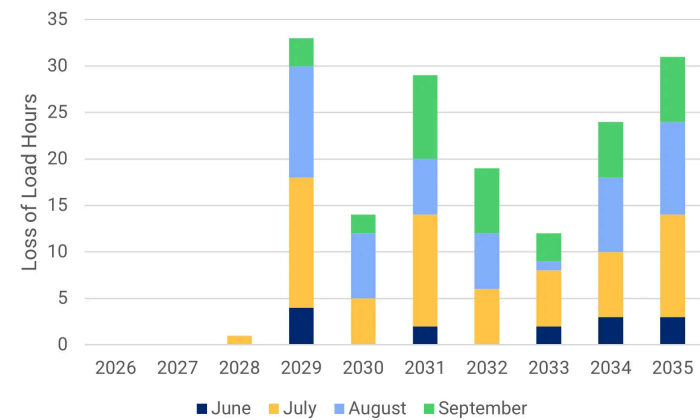
2026 2027 2028 2029 2030 2031 2032 2033 2034 2035

■ July ■ August ■ September

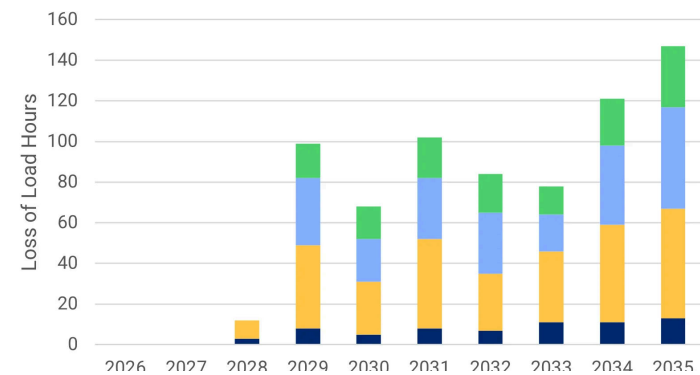
All additions scenario



95% scenario



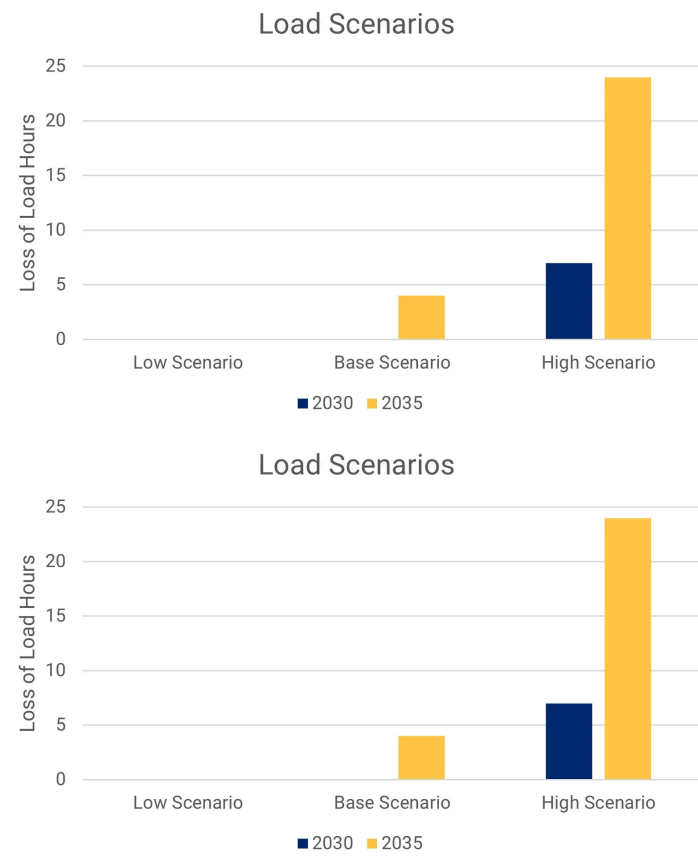
85% scenario



2020 2021 2022 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032 2033 2034 2035

■ June ■ July ■ August ■ September

67% Scenario



Subregion: British Columbia

British Columbia is a winter-peaking area that spans the province, which has a population of approximately 5.7 million. There are an estimated 11,184 miles of transmission lines in this subregion.

Current resource mix

Hydro dominates the resource mix in the British Columbia subregion with 89% of the installed capacity. Biomass makes up 5%, wind 4%, and natural gas 2% of the resource portfolio as of year-end 2024.

2035 resource mix

If all generating resources included in current resource plans are built, in 2035, hydro's share of the resource mix would decrease to 83%, primarily due to a large influx of wind capacity, which would then made up 10% of the resource portfolio.

Planned additions

2.2 GW of new generation is planned in the subregion over the coming decade, including 1.5 GW of wind in 2030. There is also .5 GW of additional hydro capacity planned in 2032.

Planned retirements

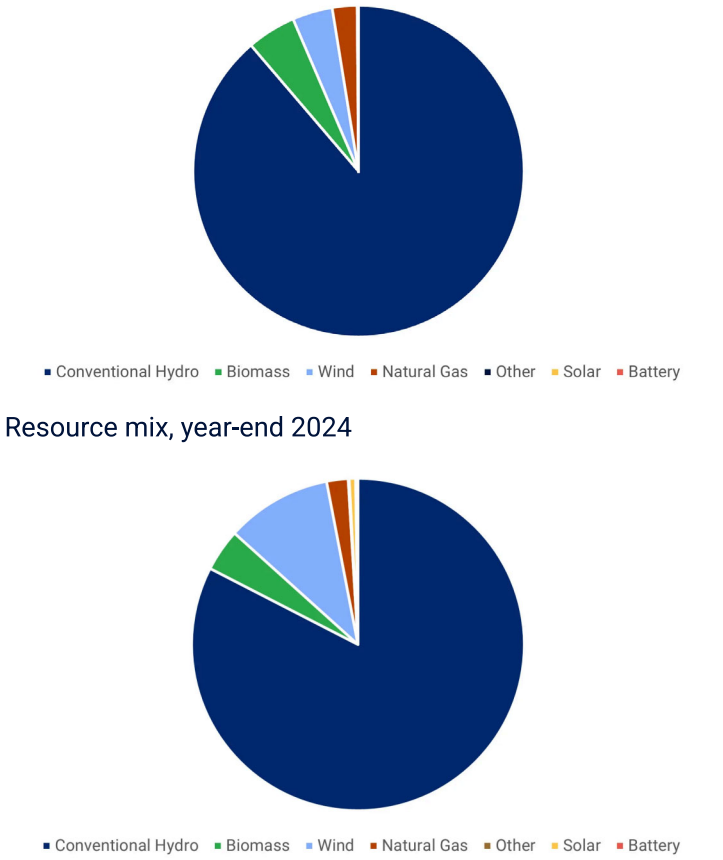
Approximately 290 MW of natural gas generation is slated for retirement over the next decade.

Annual and peak demand

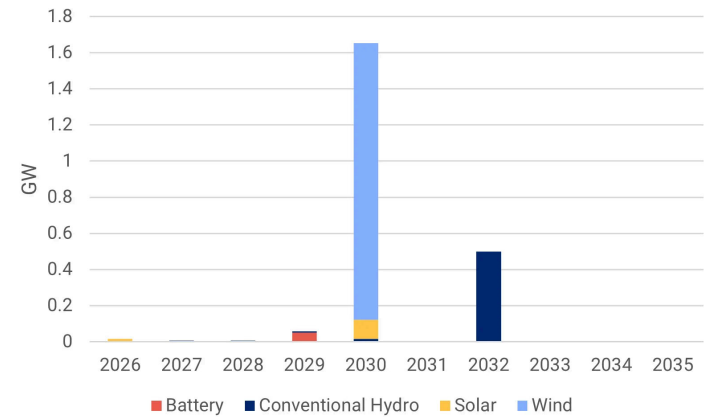
Demand in the subregion is forecast to grow by 8% over the coming decade, while peak demand is projected to increase 3.4%. Population growth, transportation and industrial electrification, and natural gas processing all contribute to demand growth in this subregion.

Loss of Load

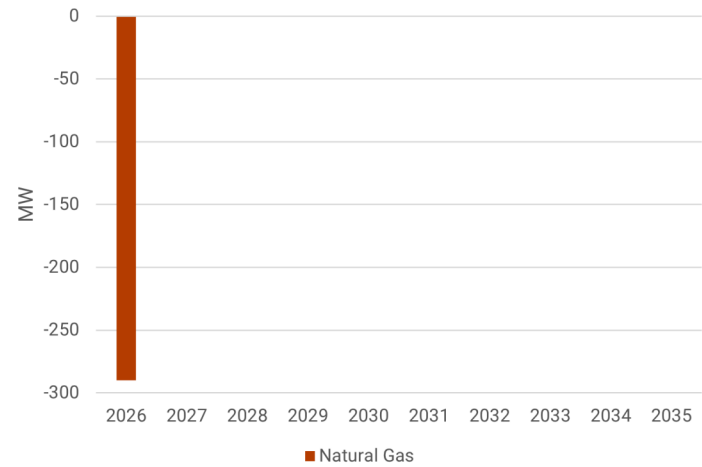
British Columbia saw no loss of load in any of the scenarios.



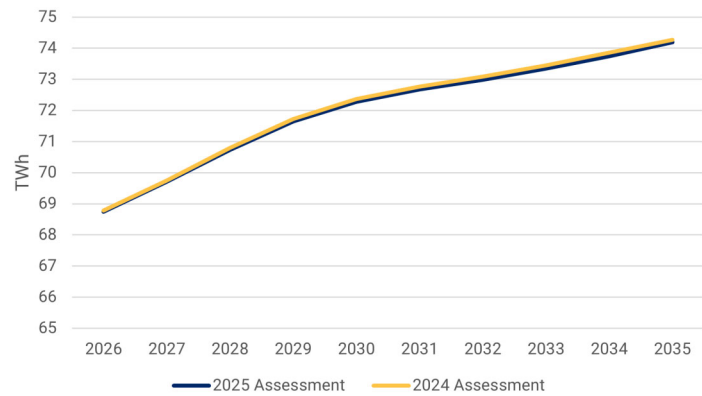
Resource mix in 2035, if all planned resources are built



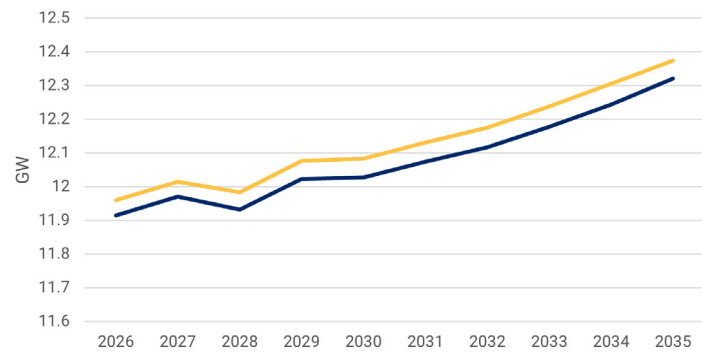
Planned resource additions, 2026-2035



Planned retirements, 2026-2035



Annual demand forecast, 2026-2035



Peak demand forecast, 2026-2035

Subregion: California

California is a summer-peaking area that includes most of the state, which has a population of over 42.5 million people. There are an estimated 32,700 miles of transmission lines in this subregion.

Current resource mix

Natural gas makes up 37% of the resource mix in the California subregion on a nameplate capacity basis, followed by solar, which makes up 24%. Hydro and BESS make up 12% and 11%, respectively. Wind is 8% of the resource mix.

2035 resource mix

If all generating resources included in current resource plans are built, in 2035, natural gas's share of the resource mix will decrease to 25%, while battery storage and wind will each increase to 17% and solar to 26%.

Planned additions

The subregion is expected to add 49 GW of new generation over the coming decade. That includes 19 GW of wind, 15 GW of solar, and 11 GW of BESS. Approximately 2 GW of natural gas and geothermal generation is expected to be added.

Planned retirements

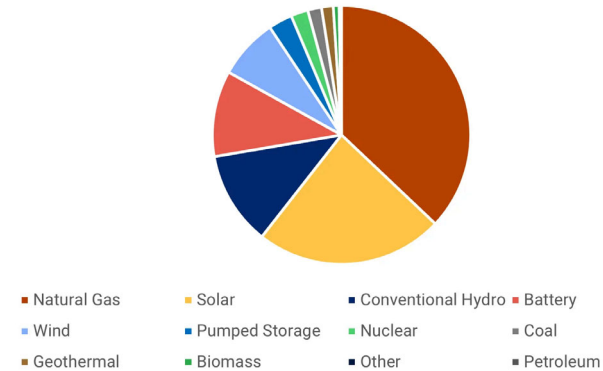
Nearly 6 GW of generation is planned for retirement over the coming decade, nearly all of it natural gas (3.6 GW) and nuclear (2.3 GW).

Annual and peak demand

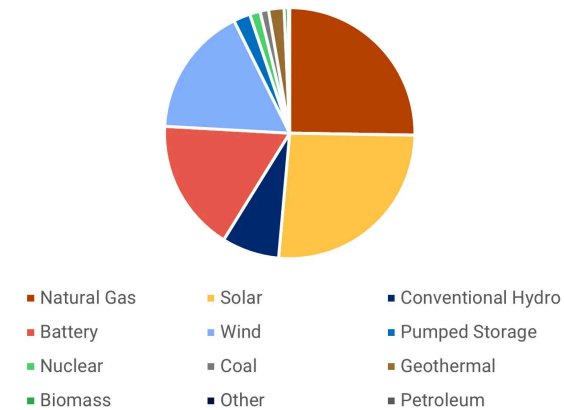
Demand in the subregion is forecast to grow by 26% over the coming decade, while peak demand is projected to increase 21%. Transportation electrification and the anticipation of additional load during extreme heat events are major factors of demand growth for this subregion.

Loss of Load

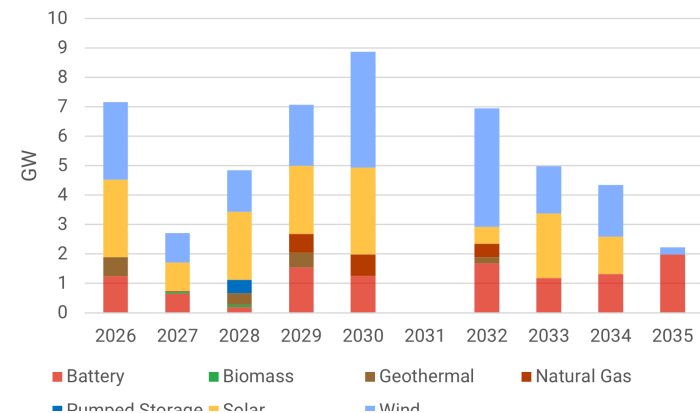
The California subregion did not show loss of load in the All Additions or High Load scenarios. California only shows loss of load under the 67%



Resource mix, year-end 2024



Resource mix in 2035, if all planned resources are built



Additions Scenario, and not until 2032, 2033, and 2035. The loss of load heat maps for 2035 for the 67% Additions Scenario are shown below.

California shows two LOLHs in 2035 totaling 471 MWh of EUE in September. This occurs between the hours of 6 and 7 p.m. This time frame is slightly after peak, which generally occurs between 4 and 5 p.m. in this subregion. During the summer, heat can linger after the peak hour, resulting in elevated demand lasting through the evening. California is anticipated to retire 6 GW of natural gas and nuclear capability over the next decade, while adding approximately 34 GW of solar and wind. Solar availability diminishes in the evening, and wind output during this time can vary. The elevated load during summer evenings, coupled with thermal retirements and diminishing solar availability during this period, result in the identified LOLHs shown below.

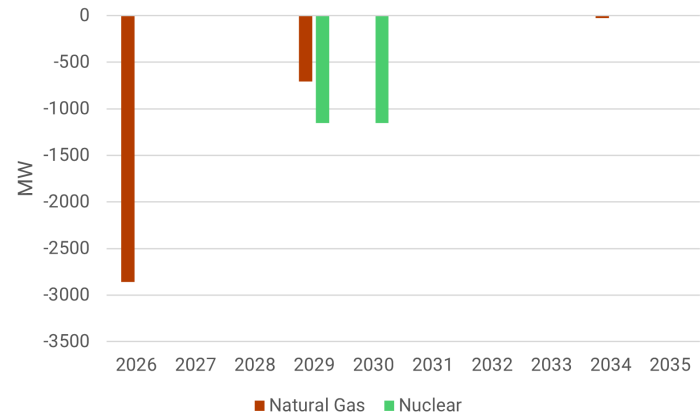
California: 67% Additions 2035 LOLH	Hour Beginning																								
	Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

LOLHs by month and hour for the California subregion in the 2035 67% Scenario

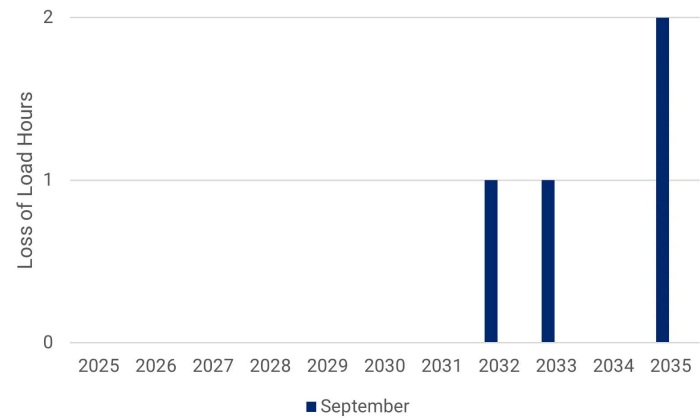
California: 67% Additions 2035 EUE (MWh)	Hour Beginning																								
	Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	471	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

EUE by month and hour for the California subregion in the 2035 67% Scenario

Planned resource additions, 2026-2035



Planned retirements, 2026-2035



67% Scenario

Subregion: Mexico

Mexico is a summer-peaking area that includes the northern portion of the Mexican state of Baja California, which has a population of 3.8 million people. There are an estimated 1,568 miles of transmission lines in this subregion.

Current resource mix

Natural gas makes up 72% of the resource mix on a capacity basis. This is followed by geothermal at 13%, solar at 8%, and petroleum at 7%.

2035 resource mix

If all generation resources are built according to current resource plans, in 2035, solar's share of the resource mix will increase to 14%, while geothermal and petroleum will decline to 9% and 4%, respectively. Natural gas remains at 72%.

Planned additions

600 MW of solar is planned to be built over the coming decade in the Mexico subregion. This occurs primarily in years 2026 and 2028.

Planned retirements

The subregion has no retirements through 2035.

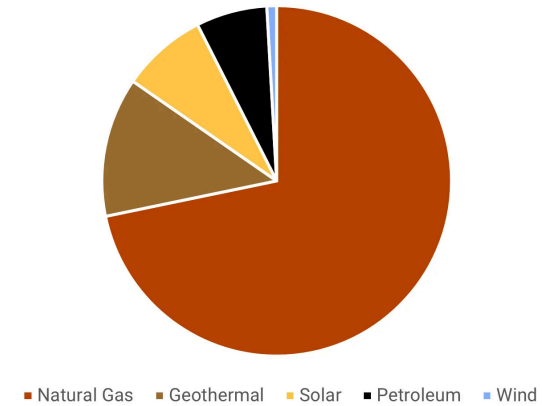
Annual and peak demand

Demand in the subregion is forecast to grow 45% over the coming decade, while peak demand is projected to increase 41%. The anticipation of additional load during extreme heat events is the major factor driving demand growth for this subregion.

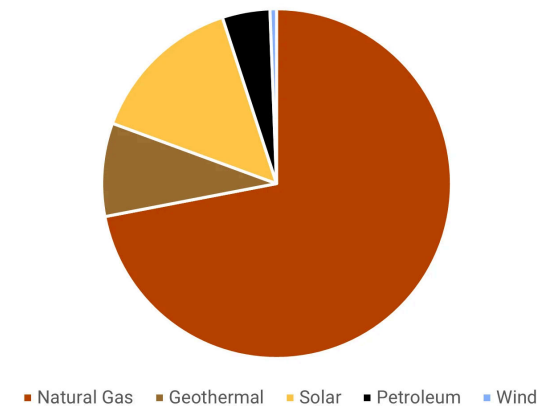
Loss of Load

The Mexico subregion only shows loss of load under the 67% Additions Scenario in years 2034 and 2035. The loss of load heat maps for 2035 are provided below for the 67% Additions Scenario.

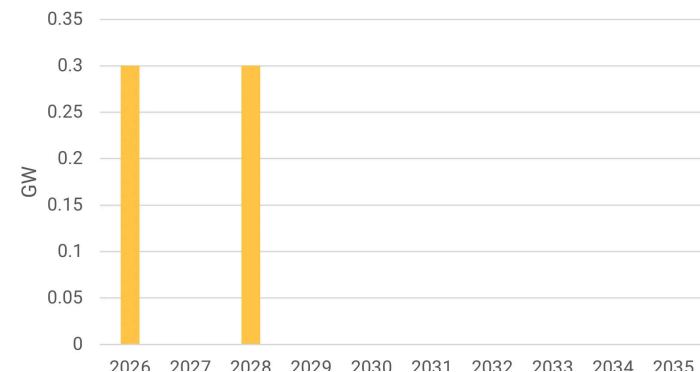
Mexico is a summer-peaking subregion that generally experiences peak load between 4 and 5 p.m. August is typically the hottest month in the subregion,



Resource mix, year-end 2024



Resource mix in 2035 if all planned resources are built



thereby experiencing the greatest demand. Similar to California and Basin, summer heat can last beyond the peak hour, resulting in elevated demand through the evening. Solar is diminished during this period, and solar resources are the only additions planned for this subregion. The significant increase in demand over the next 10 years, coupled with the solar resource additions, which have diminished efficacy as daylight wanes, are the primary reason for the LOLHs during summer evenings after peak. The California subregion does support Mexico if there is surplus energy to do so, but despite the Mexico subregion importing up to the transfer limit from California, loss of load still occurs.

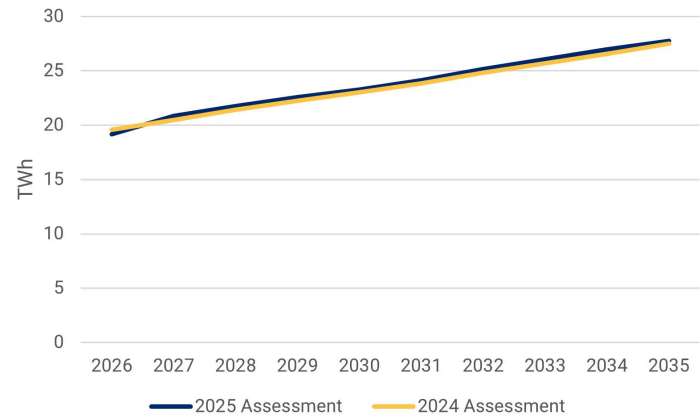
Mexico: 67% Additions 2035 LOLH	Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	17	10	10	5	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

LOLHs by month and hour for the Mexico subregion in the 2035 67% Scenario

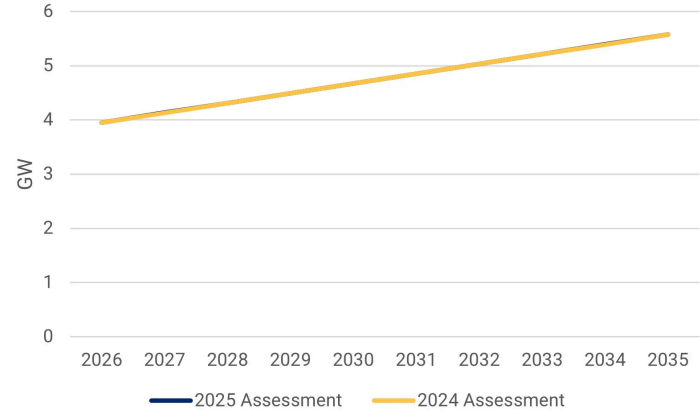
Mexico: 67% Additions 2035 EUE (MWh)	Hour Beginning																								
	Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	25	94	57	37	21	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

EUE by month and hour for the Mexico subregion in the 2035 67% Scenario.

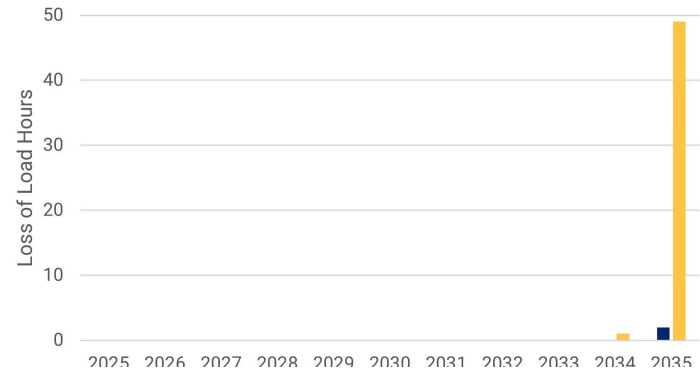
Planned resource additions, 2026-2035



Annual demand forecast. 2026-2035



Peak demand forecast, 2026-2035



2015 2020 2025 2030 2035 2040 2045 2050 2055 2060 2065 2070 2075 2080

■ July ■ August

67% scenario

Subregion: Northwest

Northwest is a winter-peaking area that includes Montana, Oregon, Washington, and parts of northern California and Idaho. The population of the subregion is approximately 13.7 million. There are 16 Balancing Authorities in this subregion, which has an estimated 32,751 miles of transmission lines.

Current resource mix

As of year-end 2024, the Northwest's resource portfolio primarily consists of hydro, natural gas, and wind resources. Hydro resources are a significant contributor to the Northwest's energy supply making up 55% of the resource portfolio. Natural gas makes up 18%, and wind accounts for 16%.

2035 resource mix

Resource plans indicate a significant influx of wind, solar, and BESS resources by year-end 2035. Wind grows to a 27% portfolio share, BESS increases to 6%, and solar increases to 9%.

Planned additions

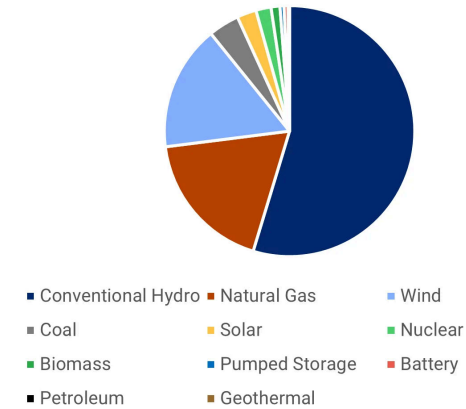
14 GW of new generation is planned in the subregion over the coming decade, including almost 8 GW of wind and 3 GW of battery storage.

Planned retirements

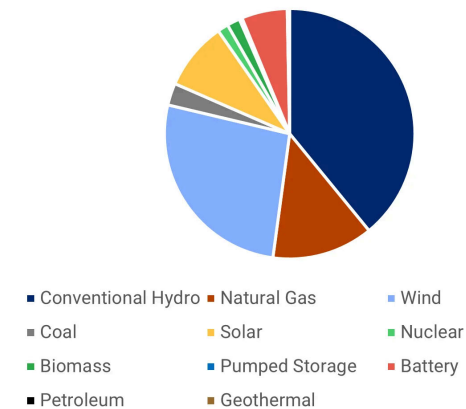
The Northwest has approximately 340 MW of retirements slated to occur between 2026 and 2035. Over one-third of these retirements is biomass facilities. Hydro, wind, and solar retirements make up approximately half the retirements. It is worth noting that part of the renewable retirements may be repowers or non-renewals of purchase power agreements. The remaining retirements are primarily natural gas resources, the majority of which are set to retire in 2035.

Annual and peak demand

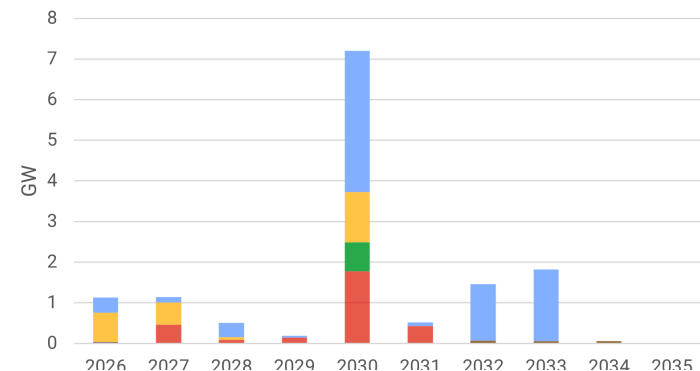
Demand in the subregion is forecast to grow by 24% over the coming decade, while peak demand is projected to increase 21%. Major drivers of demand growth in the Northwest include data centers, residential and transportation electrification, customer growth, and semiconductor manufacturing.



Resource mix, year-end 2024



Resource mix in 2035 if all planned resources are built

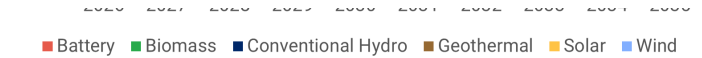


Loss of Load

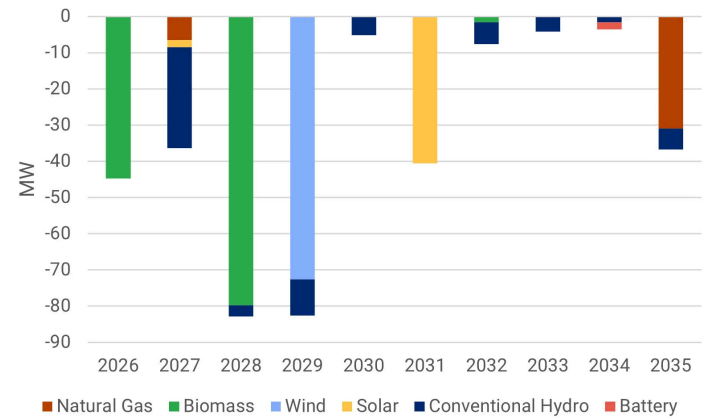
The Northwest shows loss of load in all scenarios beginning as early as 2028 in the 67% Additions Scenario. Heat maps showing the timing and seasonal loss of load are provided below for the 2030 and 2035 All Additions, 67% Additions, and High Load scenarios.

The Northwest is unique in that it experiences loss of load in the summer *and* winter in all scenarios, as well as the shoulder seasons in the High Load Scenario. The Northwest is also unique because, over the last decade, it has experienced system peaks both during the morning ramp (between 7 and 10 a.m.), which are more typical, *and* during the evening between 5 and 6 p.m. Morning ramps in the winter coincide with the greatest frequency of loss of load, whereas in the summer, the evening peak hours are when the greatest energy shortfalls are projected to occur. LOLHs and LOLEVs are greatest in the winter months, primarily in January and December, indicating that these months have a higher propensity for loss of load. Electricity is the predominant source of heat in the Northwest subregion, with the coldest temperatures occurring in the early morning and again dropping in the evening. In the winter, solar primarily contributes between the hours of 9 a.m. and 3 p.m., falling right in between the hours of greatest demand. Solar irradiance is weaker during the winter, which also lessens the contribution from solar resources. Wind makes up over 50% of the projected resource additions for the subregion, however these resources have the highest variability in energy output compared to other VERs. Wind can be prone to icing or overspeed during extreme cold weather events, which may minimize their availability during periods of elevated load. The significant demand associated with heating electrification, coupled with the timing of solar output and high wind variability, are the main drivers of LOLHs during the winter. In the summer, the primary driver of LOLHs is solar availability diminishing in the evening during periods of elevated demand. Given that BESS resources are modeled as being fully available for discharge, and that the All Additions Scenario shows LOLHs, these results indicate that the Northwest will need additional resources to meet demand over the next decade.

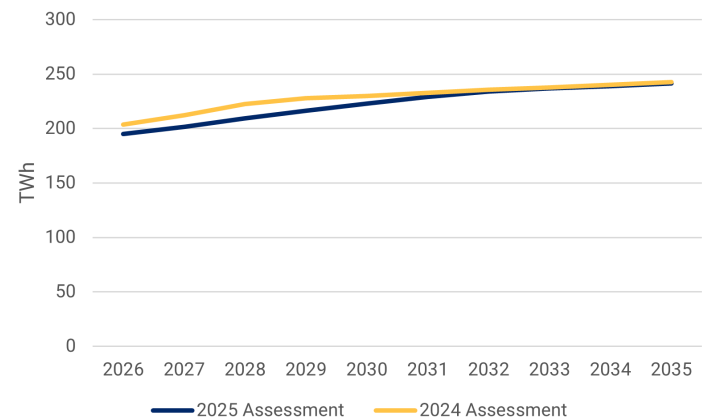
The California, Alberta, and British Columbia subregions support the Northwest during the morning winter ramps and evenings. However, transfer limitations from these subregions are frequently reached when attempting to



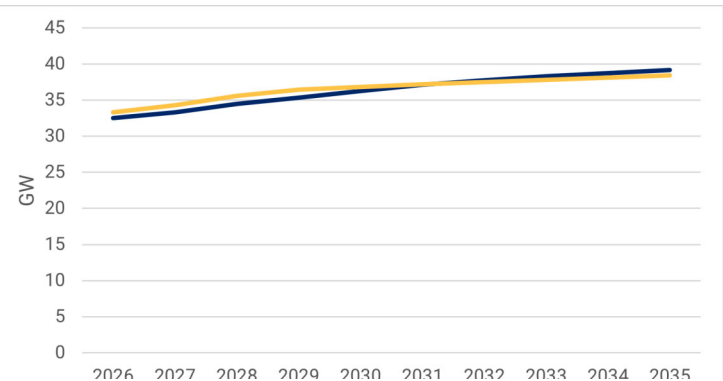
Planned resource additions, 2026-2035



Planned retirements, 2026-2035



Annual demand forecast, 2026-2035



mitigate loss of load in the Northwest, preventing further support to the subregion. In the summer, the California and Rocky Mountain subregions must meet their own native load obligations in the evenings, and can only provide limited support to the Northwest. The Alberta subregion also assists the Northwest during summer evenings but runs into transfer limitations. Beyond additional resources, additional transfer capability to the Northwest would also help reduce the projected loss of load in the subregion.

Northwest: All Additions 2030 LOLH		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	4	-	-	1	-	-	1	1	1	-	-	-	1	3	3	1	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	2	2	-	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

LOLHs by month and hour for the Northwest in the 2030 All Additions Scenario

Northwest: All Additions 2030 EUE (MWh)		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	-	-	-	2	-	-	1	1	1	-	-	-	1	38	4	1	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	875	6	-	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

EUE by month and hour for the Northwest in the 2030 All Additions Scenario

Northwest: All Additions 2035 LOLH		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	2	2	2	2	3	3	4	4	4	4	4	4	4	4	2	5	6	6	6	5	3	3	3
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	3	2	1	-	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	3	5	4	2	1	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	5	2	-	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	5	1	-	-	-	-	-	-	-	2	6	6	5	2	-	-	-	-

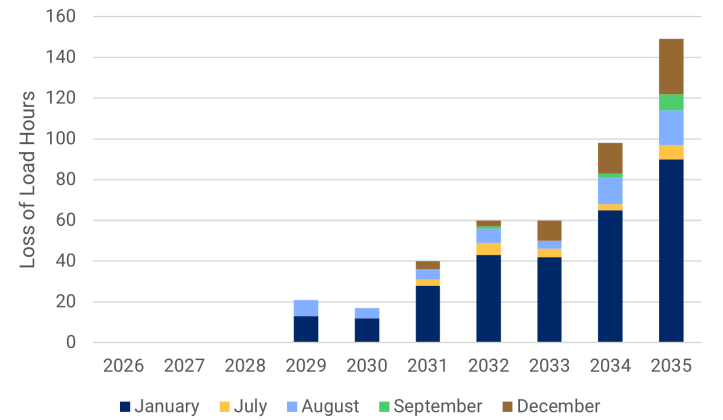
LOLHs by month and hour for the Northwest in the 2035 All Additions Scenario

Northwest: All Additions 2035 EUE (MWh)		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	18	35	54	72	54	17	8	307	90	182	478	385	216	63	16	39	269	1,864	875	246	40	32	14
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	48	293	5	-	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	990	4,046	5,044	3,151	686	3	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	89	2	-	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	35	8	-	-	-	-	-	-	-	3	88	92	27	2	-	-	-	-

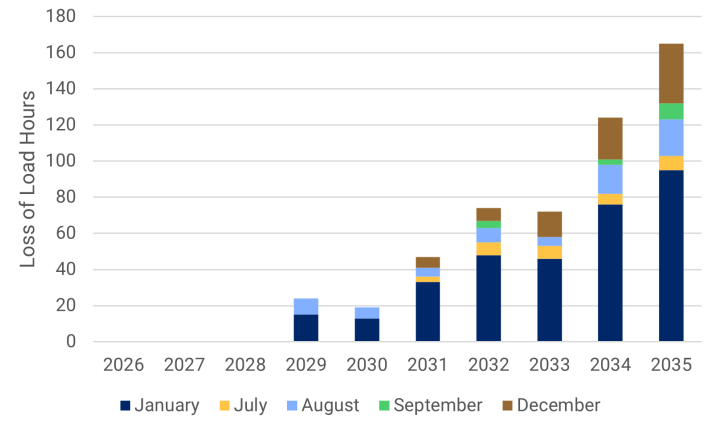
EUE by month and hour for the Northwest in the 2035 All Additions Scenario.



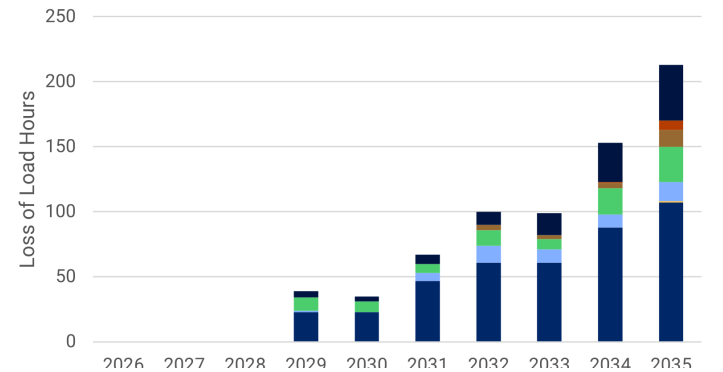
Peak demand forecast, 2026-2035



All Additions Scenario



95% Scenario



Northwest: 67% Additions 2030 LOLH		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	-	-	1	2	2	1	-	-	4	3	3	2	3	3	1	1	2	4	5	5	4	3	2	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	2	2	2	2	2	2	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	2	1	1	-	-	-	-

LOLHs by month and hour for the Northwest in the 2030 67% Additions Scenario.

Northwest: 67% Additions 2030 EUE		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	-	-	7	31	31	19	-	-	8	6	5	2	5	3	1	1	4	49	259	165	53	4	1	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	1	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	230	3,094	3,430	3,241	1,945	5	-	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8	7	5	1	-	-	-

EUE by month and hour for the Northwest in the 2030 67% Additions Scenario

Northwest: 67% Additions 2035 LOH		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	-	4	4	4	4	5	4	8	5	5	5	5	5	5	4	5	7	11	8	6	6	5	5	3	
2	-	-	-	-	-	-	-	2	4	1	5	-	-	-	-	-	-	-	2	3	2	1	-	-	
3	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
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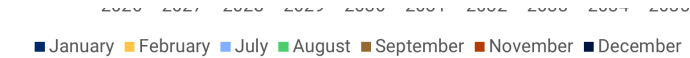
LOLHs by month and hour for the Northwest in the 2035 67% Additions Scenario

Northwest: 67% Additions 2035 EUE (MWh)		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	272	577	869	771	607	280	133	1,707	1,939	1,789	1,448	1,039	773	683	659	1,175	4,213	7,064	6,311	4,673	1,424	979	184	107	
2	-	-	-	-	-	-	39	222	18	-	-	-	-	-	-	-	-	32	309	280	1	-	-	-	
3	-	-	-	-	-	-	-	143	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11	5	-	-	-	-	
8	-	-	-	-	-	-	-	-	-	-	5	563	1,563	2,684	3,400	3,712	4,891	6,027	6,627	5,131	3,169	130	-	-	
9	-	-	-	-	-	-	-	-	-	-	-	-	-	25	125	267	1,455	1,419	2,310	1,897	1	-	-	-	
10	-	-	-	-	-	-	-	-	-	-	-	-	-	13	280	254	158	809	1	-	-	-	-	-	
11	-	-	-	-	-	12	8	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	-	-	-	-	-	-	12	-	-	-	-	-	-	-	-	-	1	131	87	4	-	-	-	-	
13	-	-	-	-	-	20	226	609	211	8	2	-	-	-	-	2	59	1,385	509	380	139	3	-	-	

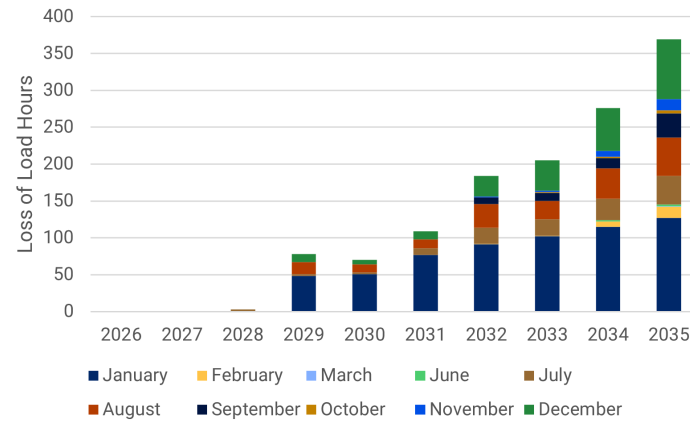
EUE by month and hour for the Northwest in the 2035 67% Additions Scenario

Northwest: High Load 2030 LOLH		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	3	4	4	4	4	4	4	4	5	5	5	4	4	4	4	4	4	6	6	6	6	5	3	4	3
2	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	3	5	3	1	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	2	6	4	5	4	1	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	6	4	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	2	1	-	-	-	-	-
12	-	-	-	-	-	2	6	9	8	2	-	-	-	-	-	-	2	7	7	6	5	-	-	-	-

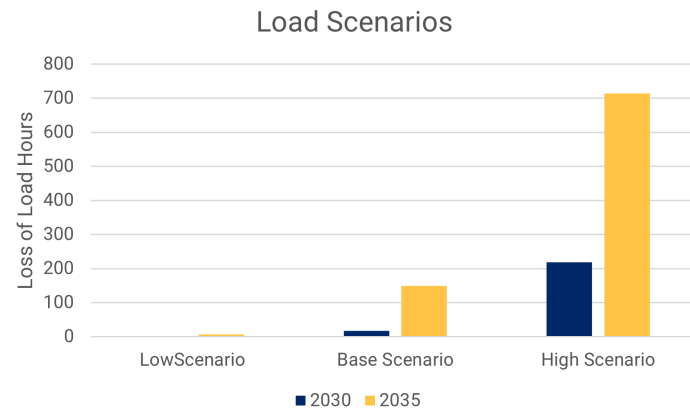
LOLHs by month and hour for the Northwest in the 2030 High Load Scenario



85% Scenario



67% scenario



Northwest: High Load 2030 EUE (MWh)		Hour Beginning																									
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23			
1	138	288	338	432	301	138	53	215	231	106	464	335	196	142	177	115	479	903	644	142	29	181	76	43			
2	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
3	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	168	1019	482	1	-	-	-		
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	276	3033	3592	3493	2776	923	10	-	-	-		
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	288	239	54	-	-	-	-	-		
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	2	1	-	-	-	-		
12	-	-	-	-	-	16	135	290	94	1	-	-	-	-	-	-	5	133	154	47	9	-	-	-	-		

EUE by month and hour for the Northwest in the 2030 High Load Scenario

Northwest: High Load 2035 LOLH		Hour Beginning																									
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23			
1	6	6	6	6	6	6	6	9	7	7	8	8	8	7	6	6	8	9	9	7	7	7	5	5			
2						2	5	8	7	4	2					1	2	5	6	5	4	2					
3						1	6	7	5	4									3	3	1						
4																											
5																											
6																			1	1	1						
7															1	2	4	13	18	17	16	5					
8											1	1	2	2	2	3	5	11	24	24	15	6	2				
9														1	1	4	7	12	13	11	6						
10					1	5	6	6	1									2									
11						1	4	9	3	2							2	5	6	2	1						
12		1	2	3	6	8	10	15	14	13	9	3	1			5	14	17	16	14	13	8	3				

LOLHs by month and hour for the Northwest in the 2035 High Load Scenario

Northwest: High Load 2035 EUE (MWh)		Hour Beginning																									
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23			
1	2,314	3,558	4,340	5,329	4,521	2,725	1,139	2,968	4,233	4,668	4,582	2,159	2,594	1,864	2,282	2,212	4,285	6,665	6,056	4,645	2,272	1,218	959	1,411			
2	-	-	-	-	-	37	194	786	606	18	2	-	-	-	-	1	41	353	1,272	383	97	2	-	-	-		
3	-	-	-	-	-	1	161	229	97	4	-	-	-	-	-	-	-	-	6	8	1	-	-	-	-		
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	23	11	5	-	-	-	-		
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	198	695	5,237	7,512	5,304	887	56	-	-	-		
9	-	-	-	-	-	-	-	-	-	1	3	81	186	470	1,088	1,143	1,874	6,833	8,470	6,212	3,705	876	75	-	-		
10	-	-	-	-	-	-	-	-	-	-	-	-	-	0	2	11	62	542	2,620	2,598	713	25	-	-	-		
11	-	-	-	-	7	159	332	295	1	-	-	-	-	-	-	-	-	73	-	-	-	-	-	-	-		
12	-	-	-	-	13	126	281	8	2	-	-	-	-	-	-	-	-	85	243	193	42	16	-	-	-		
1	8	20	33	135	570	3,183	5,090	1,911	297	35	2	1	-	-	-	35	309	933	809	628	395	97	25	-	-		

EUE by month and hour for the Northwest in the 2035 High Load Scenario

Subregion: Rocky Mountain

Rocky Mountain is a summer-peaking area that includes Colorado, most of Wyoming, and parts of Nebraska and South Dakota. The population of the area is approximately 6.7 million. There are an estimated 18,800 miles of transmission lines in this subregion.

Current resource mix

On a capacity basis, the resource portfolio in the Rocky Mountain subregion primarily consists of natural gas, coal, and wind resources. Natural gas and coal together make up 55% of the resource mix, with wind at 21%. Solar and hydro each make up 10%. Battery storage is at 1%.

2035 resource mix

If all generation resources are built according to current resource plans, the capacity of thermal generation in the subregion will decrease to 40%, from 55% today. Wind would increase to 31% of the resource mix, while solar would increase to 14% and BESS to 6%.

Planned additions

15 GW of new resources is planned in the subregion over the coming decade, including almost 8 GW of wind and 3 GW of both natural gas and solar.

Planned retirements

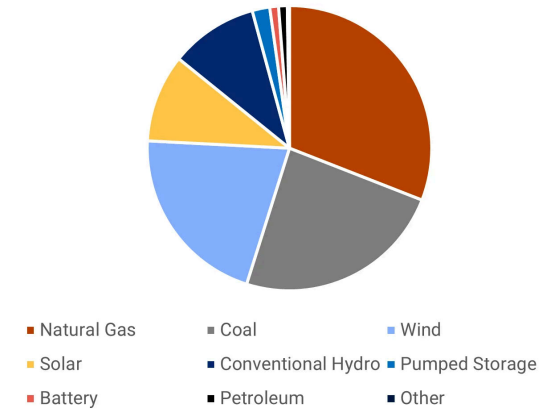
Over 6 GW of generation is planned for retirement over the coming decade, including 2.8 GW of coal and 1.7 GW of both natural gas and wind.

Annual and peak demand

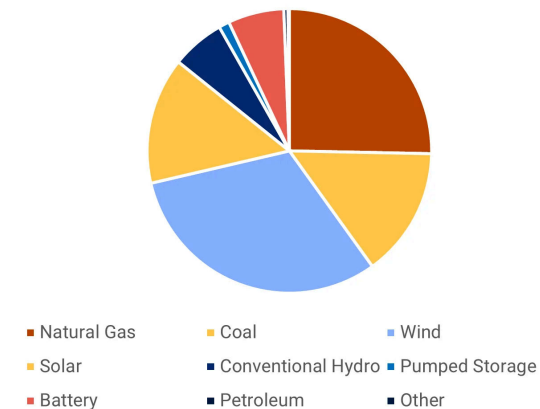
Demand in the subregion is forecast to grow by 27% over the coming decade, while peak demand is projected to increase 23%. Major drivers of demand growth in the Rocky Mountain subregion include data centers, as well as commercial and industrial customer growth.

Loss of Load

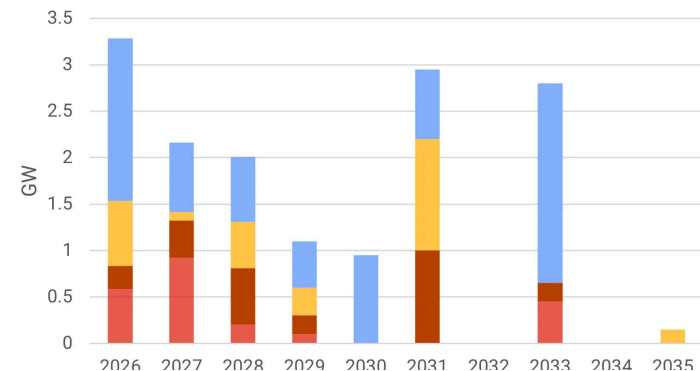
The Rocky Mountain subregion does not show loss of load in the All Additions or High Load scenarios. This subregion shows loss of load under



Resource mix, year-end 2024



Resource mix in 2035, if all planned generation is built



the 67% Additions Scenario for years 2030 through 2035, as well as one LOLH in 2034 and 2035 of the 85% Additions Scenario. The loss of load heat maps for the 2030 and 2035 67% Additions Scenario are provided below.

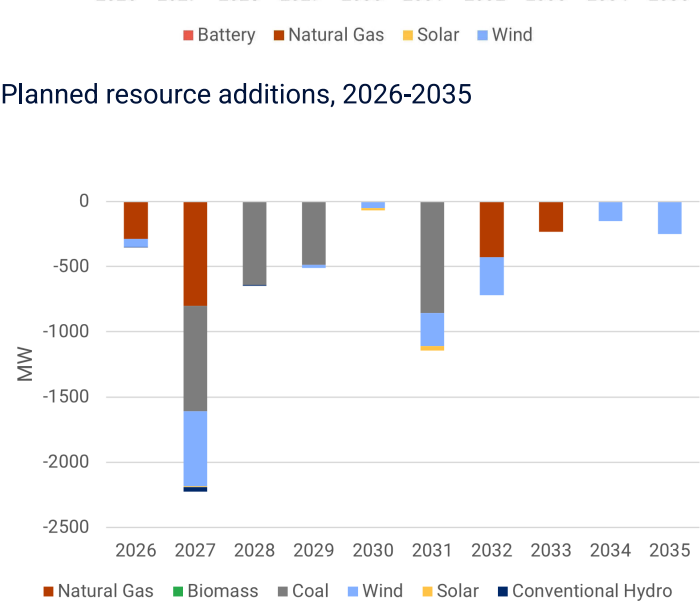
The Rocky Mountain subregion shows one LOLH for 5 MWh of EUE in 2030 and 18 LOLHs for 4,297 MWh of EUE in 2035 in the 67% Additions Scenario. The LOLHs occur between the hours of 4 and 9 p.m., primarily in July and August. This time frame includes the peak hour, which is anticipated to occur in the summer between 4 and 5 p.m. The Rocky Mountain subregion is showing a significant increase in both its annual demand and peak hour forecasts. The 2035 peak hour demand is projected at over 3 GW higher than last year’s forecast, and the annual demand totals close to 13 TWh higher than last year’s forecast. Similar to other subregions showing LOLHs during and shortly after their summer evening peak, these LOLHs are primarily a product of demand remaining elevated while solar output diminishes. In addition, there are over 6 GW of resource retirements with 4.5 GW of that being thermal resources. The additions in the 67% Additions Scenario total about 10 GW, with close to 7 GW of that being VERs. The reduction in additions, coupled with the increased uncertainty in energy output and unchanged retirements in the 67% Additions Scenario, also contribute to the LOLHs projected for this subregion.

Rocky Mountain: 67% Additions 2030 LOLH		Hour Beginning																							
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

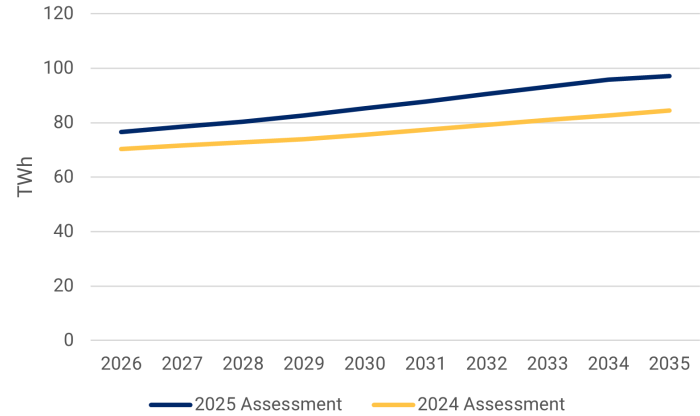
LOLHs by month and hour in the 2030 67% Additions Scenario

Rocky Mountain: 67% Additions 2030 EUE		Hour Beginning																							
	(MWh)																								
Month		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

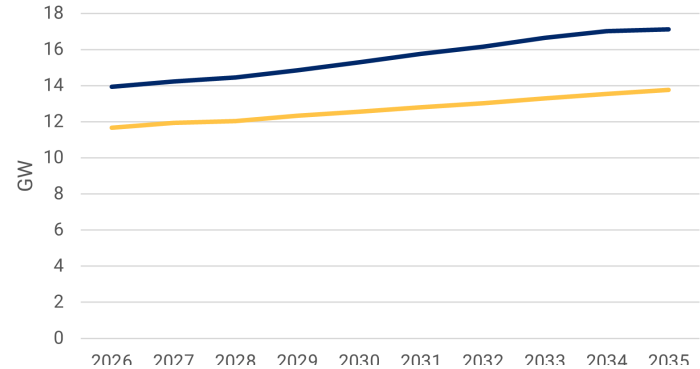
EUE by month and hour for the Rocky Mountain subregion in the 2030 67% Additions Scenario



Planned retirements, 2026-2035



Annual energy demand forecast, 2026-2035



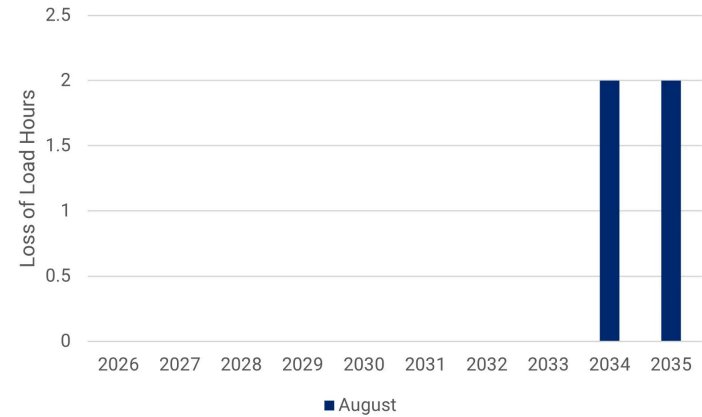
Rocky Mountain: 67% Additions 2035 LOLH		Hour Beginning																							
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-	
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	6	7	-	-	-	-	
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	2	9	5	1	-	-	-	
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
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12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-	-	

LOLHs by month and hour for the Rocky Mountain subregion in the 2035 67% Additions Scenario

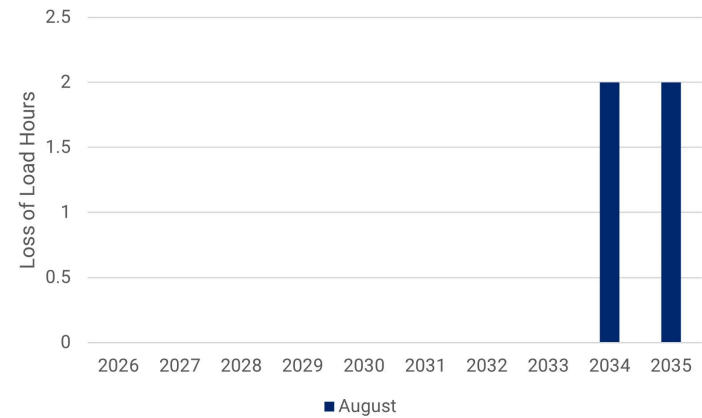
Rocky Mountain: 67% Additions 2035 EUE										Hour Beginning														
Month	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21	3	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	1,199	891	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	135	1,418	595	31	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	3	-	-	-	-	-	-

EUE by month and hour for the Rocky Mountain subregion in the 2035 67% Additions Scenario

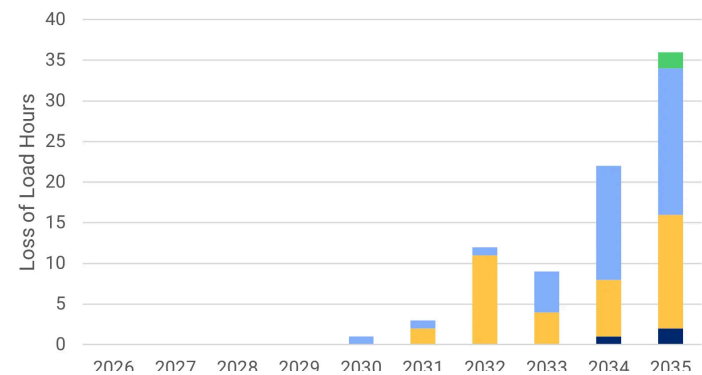
Peak demand forecast, 2026-2035



85% Scenario



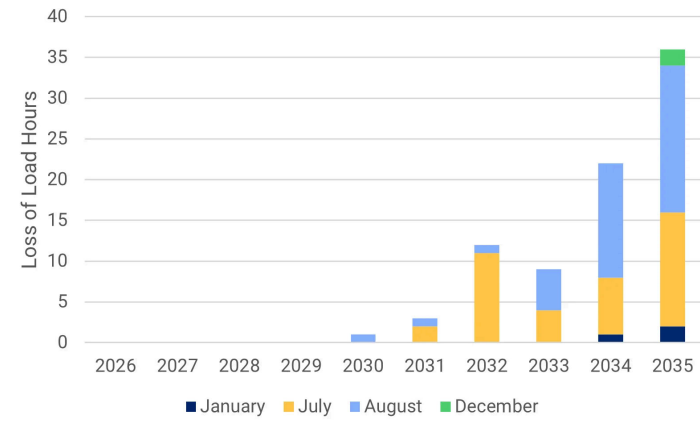
85% Scenario



2026 2027 2028 2029 2030 2031 2032 2033 2034 2035

■ January ■ July ■ August ■ December

67% scenario



67% scenario

Subregion: Southwest

Southwest is a summer-peaking area that includes all of Arizona and New Mexico, most of Nevada, and a small part of Texas. The area has a population of approximately 13.6 million. There are an estimated 23,100 miles of transmission lines in this subregion.

Current resource mix

As of year-end 2024, natural gas makes up almost half of the resource mix in the subregion (46%), while solar makes up 16%. Coal, wind, nuclear, and BESS make up between 7% and 9% each of the current resource mix.

2035 resource mix

If all generation resources are built according to current resource plans, in 2035, the resource mix will comprise 22% natural gas, 37% solar, and 18% battery storage. Along with natural gas's significant decline in the share of the resource mix, coal is expected to drop from 9% today to 4% in 2035.

Planned additions

70 GW of new resources are planned in the subregion over the coming decade, more than in any other subregion. Over half of the planned additions are solar (37 GW). 17 GW of BESS is planned, and 10 GW of wind.

In addition, 40 GW of the planned additions are tier 3 resources, which are more speculative.

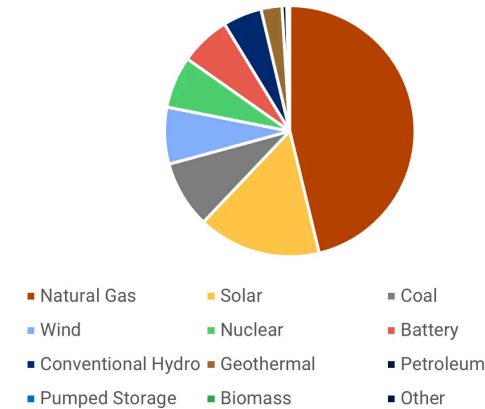
Planned retirements

7 GW of generation is planned for retirement over the coming decade, including 3 GW of coal and 2 GW of natural gas.

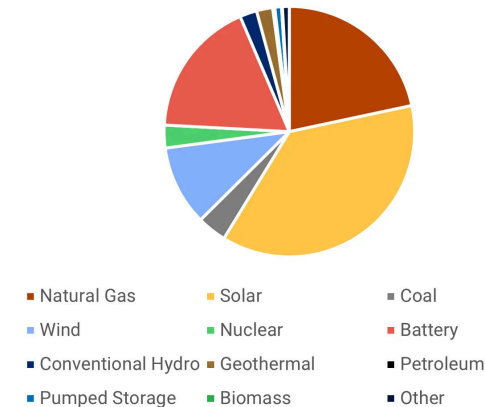
Annual and peak demand

Demand in the subregion is forecast to grow 42% over the coming decade, while peak demand is projected to increase 29%. The major drivers of demand growth in the Southwest subregion include data centers, industrial and residential electrification, and residential customer growth.

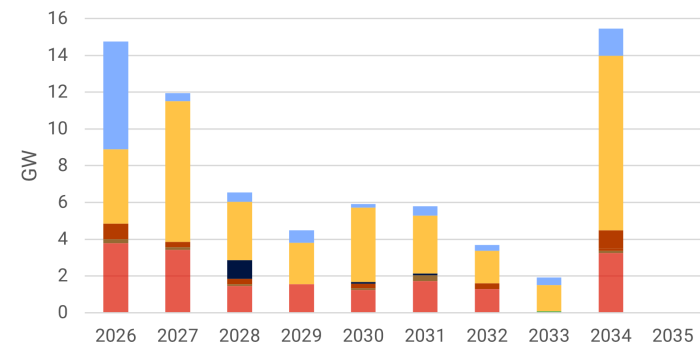
Loss of Load



Resource mix, year-end 2024



Resource mix in 2035, if all planned resources are built



The subregion did not show loss of load in any scenario over the coming decade.

- Battery

Biomass

Geothermal

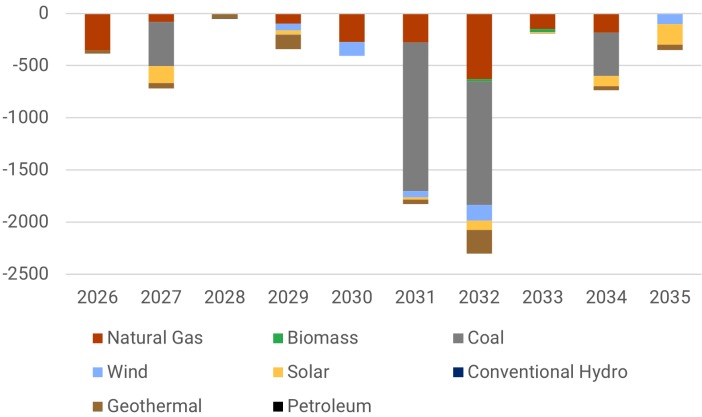
Natural Gas
- Other

Pumped Storage

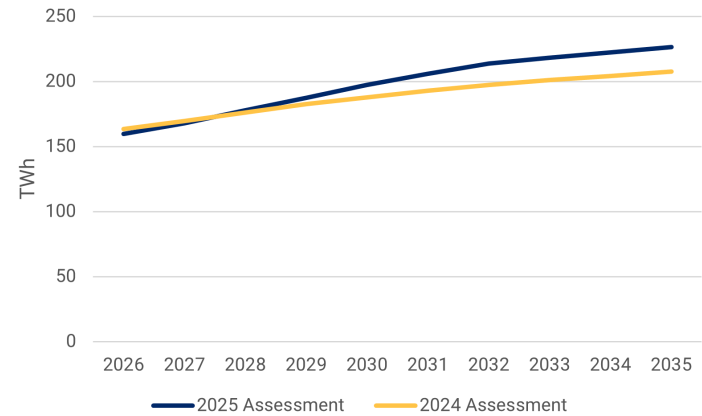
Solar

Wind

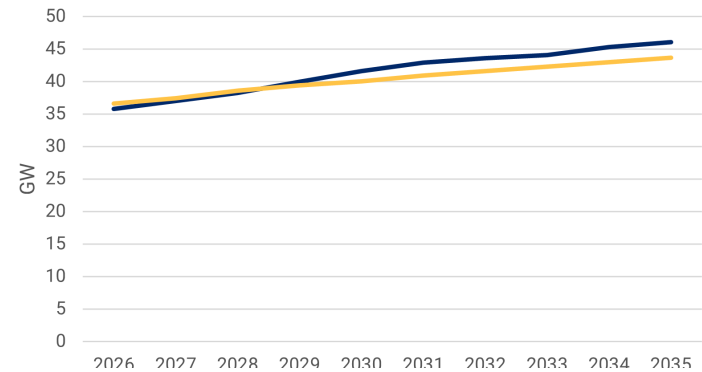
Planned resource additions, 2026-2035



Planned retirements, 2026-2035



Annual demand forecast, 2026-2035



Peak demand forecast, 2026-2035

Transfers

Transfers by subregion for years 2030 and 2035 for the All Additions, 67% Additions, and the High Load scenarios are provided below. Transfers are separated into imports and exports and shown both by month and by hour of the day.

The Northwest shows the greatest amount of imports in all scenarios. This is particularly true in the winter months during the morning and evening ramps. As discussed in the Northwest Loss of Load Section, winter mornings and evenings are the times when this subregion experiences most of its loss of load. MAVRIC's transfer logic only allows for transfers when loss of load is identified for an area in an islanded state. Therefore, the timing and magnitude of imports align with the periods of greatest need for a subregion. Most of the transfers to the Northwest come from the California subregion, specifically during the morning ramp hours of the winter months when the California subregion has surplus energy. There are times where the transfer limits from the California subregion to the Northwest are met, and Alberta, British Columbia, and Rocky Mountain subregions also support the Northwest. However, transfer limits from the Alberta and British Columbia subregions to the Northwest are frequently reached when attempting to mitigate loss of load in the Northwest. This indicates that additional transfer capability to the Northwest from the California, Alberta, or British Columbia subregions would help alleviate winter LOLHs.

Summer evenings in the Northwest appear to be partially supported by the California subregion as well. However, the California subregion's ability to export during the evening becomes limited due to diminished solar and elevated native load. In other words, transfer limits to the Northwest from California during summer evenings are rarely met, as California is satisfying its obligations rather than exporting power. With less support from the California subregion, the Northwest leans more heavily on Alberta and the Rocky Mountain subregion for support. The Alberta subregion appears to hit its transfer limits to the Northwest frequently during summer evenings, indicating that loss of load could partially be alleviated with additional transfer capability from Alberta to the Northwest. The Rocky Mountain subregion can assist during summer evenings to an extent but does not hit its transfer limits to the Northwest. This indicates that, like California, the Rocky Mountain subregion must also meet its native load during summer evenings and can only provide limited support to the Northwest.

Basin also shows loss of load in all scenarios, primarily during summer evenings in the latter years of the Western Assessment. As such, Basin is primarily shown to import energy from June through August during and after its evening peak. During these hours, external transfers are sourced from the Rocky Mountain, Southwest, and California subregions. The Southwest subregion maxes out its transfer capability to Basin during the summer evening hours, indicating that there may be additional energy in the Southwest that could be provided to Basin if additional transfer capability were available. The Rocky Mountain and California subregions do not meet their transfer limits when assisting Basin on summer evenings, indicating that these subregions are meeting native load obligations with available resources rather than providing surplus energy to Basin. This is exacerbated in the High Load Scenario, in which transfers from the Rocky Mountain and California subregions become even more limited, resulting in an increase in LOLHs within the Basin subregion. This is despite Basin not having additional speculative large load demand in the subregion itself.

The Southwest shows a significant bump in exports during summer evenings in 2035 of the 67% Additions and High Load scenarios. Most of this increase in export activity is to support both the Basin and Rocky Mountain subregions. Mexico displays a notable increase in its imports in the 2035 67% Scenario, which are primarily fulfilled by the California subregion. Many LOLHs in the Mexico subregion occur despite the California subregion exporting up to its transfer limit to the Mexico subregion.

All Additions

Subregional transfers by month and time of day for the 2030 All Additions Scenario

Subregional transfers by month and time of day for the 2035 All Additions Scenario

67% Additions

Subregional transfers by month and time of day for the 2030 67% Additions Scenario

Subregional transfers by month and time of day for the 2035 67% Additions Scenario

High Load

Subregional transfers by month and time of day for the 2030 High Load Scenario

Subregional transfers by month and time of day for the 2035 High Load Scenario

Methods & Data

- [Read](#) the methodology used in this assessment.
 - [Read](#) the glossary of terms used in this assessment.
 - This year's Western Assessment uses eight new subregional boundaries that better align with operational and planning realities and are consistent with other WECC assessments.
 - This assessment uses Loads & Resources data provided by the Balancing Authorities in early 2025.
-

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-185
Current Energy Group April Report



CURRENT
ENERGY GROUP

Resource Adequacy in the Mountain West

Addendum to

“An Assessment of Resource Adequacy Studies Following the Planned Retirement of Craig Station Unit 1”

Prepared for Earthjustice, Sierra Club, and Environmental Defense Fund

Authors

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Edward Burgess

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Executive Summary

On March 30, 2026, the U.S. Department of Energy (DOE) issued Order No. 202-26-21 (2026 Order), extending the requirement that Craig Station Unit 1 remain available to operate through June 28, 2026.¹ Previously, on December 30, 2025, the DOE issued Order No. 202-25-14 (2025 Order), which had required Craig Unit 1's continued availability through March 30, 2026. The 2026 Order relies on a finding that emergency conditions exist in the Western Electricity Coordinating Council (WECC) Rocky Mountain assessment area, a geographic area that differs from the WECC Northwest assessment area identified in the 2025 order, due to a shortage of electric energy, a shortage of generation facilities, and other causes.

The 2026 Order rests on a similar but not identical evidentiary foundation as the 2025 Order, in that the 2026 Order relies on the North American Electric Reliability Corporation's (NERC) 2025 Long-Term Reliability Assessment (LTRA) and WECC's 2025 Western Assessment of Resource Adequacy (WARA) while the 2025 Order relied on the 2024 LTRA and the 2024 WARA. The 2026 Order relies on the same U.S. Energy Information Administration (EIA) generation data, invokes the same executive orders, and cites to the same DOE July 2025 Resource Adequacy Report, as in the 2025 Order.

Current Energy Group prepared a report that accompanied the request for rehearing of the 2025 Order. This addendum to that report evaluates whether the updated sources in the 2026 Order provide any basis for the finding of a current emergency. It also addresses a shift in the geographic framing of the Order, from the WECC Northwest to the WECC Rocky Mountain assessment area, and assesses whether that reframing materially changes the reliability picture. As in the original report, CEG did not conduct independent modeling; rather, this addendum examines how, if at all, the methodology, assumptions, and conclusions of DOE's cited sources speak to the existence of a resource adequacy crisis in the relevant area.

We conclude that the 2026 Order does not provide a reasoned basis for the declared emergency. The 2026 Order's evidentiary record suffers from the same fundamental limitations identified in our original report.

First, the sources on which DOE relies do not support the existence of a near- or medium-term resource adequacy crisis. NERC's 2025 LTRA rates the WECC Rocky Mountain region at normal risk of energy shortfalls over the next five years, its lowest risk category. The reserve margin concerns NERC identifies are not projected to arise until Summer 2034 and Winter 2034-35, roughly eight years from now, which is typical of normal, non-emergency conditions. The reframing of the Order's geographic scope from the WECC Northwest to the WECC Rocky Mountain assessment area does not strengthen the evidentiary basis for the Order. The change reflects NERC's own updated assessment area boundaries rather than any new evidence of reliability risk, and the underlying

¹ U.S. Department of Energy (DOE). "Order No. 202-26-21," March 30, 2026.
<https://www.energy.gov/documents/doe-order-no-202-26-21-craig>

reliability picture for Colorado and the broader Rocky Mountain region is no less secure than what was assessed in the original order.

Second, the long-term projections in some sources identified in the 2026 Order are consistent with the normal and intended function of resource adequacy planning: to identify the potential need to acquire new resources with sufficient lead time for state, regional, and utility processes to respond with deliberate, coordinated action. The identification of a potential reserve margin shortfall in 2034 does not constitute an emergency in 2026. Using projected long-term deficits to justify near-term emergency action conflates two distinct planning functions and could render the emergency order authority effectively boundless. Any region with projected growth in energy demand could be characterized as facing an emergency at any time.

Third, the 2026 Order invokes data center and industrial load growth as a basis for emergency action; but such growth is highly uncertain, and the evidence shows it will materialize at a different pace and scale than projected, with projects frequently failing to materialize on the timelines initially claimed. The 2026 Order does not evaluate this issue. Further, even accepting the projections at face value, data center load growth in the Rocky Mountain assessment area is not a near-term phenomenon that gives rise to an emergency condition. The geographic scope of the 2026 Order is not aligned with the projections cited in the Order regarding data center development: Colorado and the WECC Rocky Mountain assessment area are not among the primary markets for such development.

The retirement of Craig Station Unit 1 represents a long-planned transition that is reflected in regional planning analyses and is not identified as a driver of either near- or medium-term reliability risk. The studies cited in the 2026 Order do not support the existence of an emergency.

Introduction

This report is an addendum to CEG's January 2026 report assessing DOE Order No. 202-25-14, which required Craig Station Unit 1 in Craig, Colorado to remain available to operate through March 30, 2026. On March 30, 2026, the Department of Energy issued Order No. 202-26-21, extending that requirement through June 28, 2026 on similar grounds. Specifically, the Department claims that there is a continuation of emergency conditions in the WECC Rocky Mountain assessment area due to a shortage of electric energy and generation facilities.

This addendum evaluates whether the new evidence cited in the 2026 Order supports DOE's emergency determination, applying a similar analytical framework as the original report. The addendum is organized as follows:

- Section I evaluates each of the sources DOE relies upon: namely the 2025 NERC LTRA, WECC's 2025 WARA, DOE's July 2025 Resource Adequacy Report, and EIA generation data. This evaluation concludes that none of the evidence presented supports the existence of a near-term or long-term emergency for reliability of the electricity system.
- Section II provides additional context demonstrating that the identification of potential long-term resource adequacy gaps is a normal feature of utility resource planning, not evidence of an emergency.
- Section III addresses the 2026 Order's reliance on national demand growth narratives, including data center and industrial load projections, and explains why those narratives do not establish a reliability emergency in the WECC Rocky Mountain assessment area.

The original report is incorporated by reference.

I. The 2026 Order's Evidentiary Basis Does Not Support a Finding of An Emergency

In the 2026 Order, DOE relies on four sources in support of its emergency determination: the 2025 NERC LTRA, WECC's 2025 WARA, DOE's own July 2025 Resource Adequacy Report, and EIA generation data. This section evaluates each in turn and concludes that none of them, individually or collectively, support the existence of a near-term resource adequacy crisis.

NERC's Long-Term Reliability Assessment

NERC annually releases the LTRA to provide a forward-looking, regional assessment of bulk power system reliability over a 10-year period. The assessment is primarily targeted at the medium- and long-term timeframes and assigns a risk level to each region using a three-tiered classification system: "high risk," "elevated risk," and "normal risk."

2024 LTRA — WECC Northwest Assessment Area

The 2025 Order cited the 2024 LTRA in support of its emergency determination.² As discussed in detail in the original report, the 2024 LTRA's findings did not support the proposition that the assessment area containing Craig 1 i (i.e., the WECC NW assessment area, which for purposes of the 2024 LTRA included the Rocky Mountain area) faced near- or medium-term resource adequacy risk. The assessment assigned the region its lowest possible risk classification, "normal risk," across the full study period through 2034, reported negligible unserved energy and loss-of-load risk, and identified reserve margins substantially above the reference margin level until the summer of 2031.³ The assessment did not identify planned retirements as a reliability concern and did not call for delaying them.

2025 LTRA — WECC Rocky Mountain Assessment Area

The 2026 Order cites the 2025 LTRA in support of its continued emergency determination.⁴ In the 2025 LTRA, WECC changed the geographic boundaries of assessment areas, such that Craig Unit 1 is now located in what WECC calls the Rocky Mountain assessment area. Much like the 2024 LTRA, the 2025 LTRA assigned the geographic area where Craig 1 is located (i.e., the WECC Rocky Mountain area) its lowest possible risk classification: "normal risk."⁵ This designation means that resource adequacy criteria are met, and there is a low likelihood of electricity supply shortfall even when demand exceeds forecasts or resource performance is abnormally low (i.e. below the lowest risk criteria level).

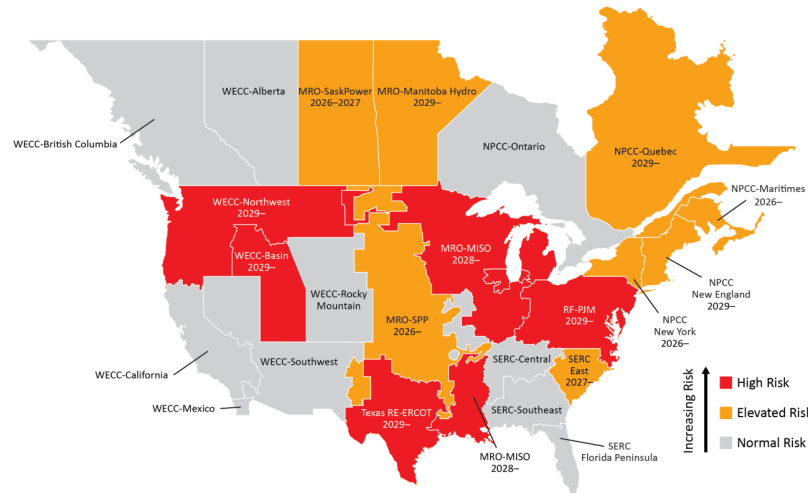
² 2025 Order, at 1.

³ NERC, 2024 LTRA (Corrected July 11, 2025), at 6 and 127-130, available at https://www.nerc.com/globalassets/our-work/assessments/2024-ltra_corrected_july_2025.pdf

⁴ 2026 Order, at 3.

⁵ NERC, 2025 LTRA (January 2026), at 7, available at https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf

Figure 1: NERC Risk Area Summary 2026-2030 (Source: 2025 LTRA)



Near-Term Findings

The 2025 LTRA assigned the WECC Rocky Mountain region its lowest possible risk classification: "normal risk." The study found that planned resources meet demand and reliability margins for all hours, with zero EUE⁶ and zero LOLH⁷ in both 2027 and 2029 (the two years studied).⁸ The assessment does not identify any near-term reliability violations or unserved energy risk in the region, and does not identify Craig Unit 1's planned retirement as a contributing factor to any near-term reliability concern. The Anticipated Reserve Margin (ARM) for the region stands at 60.0% in 2027 and 38.1% in 2029, substantially above the Reference Margin Levels (RML) of 17.0% and 16.1% respectively.⁹

Table 2: Base Case Summary of NERC 2025 LTRA Results for WECC-Rocky Mountain

	2027	2029
EUE (MWh)	0	0
LOLH (hours per year)	0	0
Anticipated Reserve Margin	60.0%	38.1%

⁶ Expected Unserved Energy or "EUE" is a standard metric of reliability risk used in electric system planning. A lower EUE value indicates a more reliable system in the years evaluated.

⁷ Loss of Load Hours or "LOLH" is a standard metric of reliability risk used in electric system planning. A lower LOLH value indicates a more reliable system in the years evaluated.

⁸ 2025 LTRA, at 161.

⁹ *Id.* at 159.

Medium-Term Findings

The 2025 LTRA finds that the ARM remains above the RML through 2033.¹⁰ The ARM and Prospective Reserve Margin (PRM) first fall below the RML in 2034 and 2035 (respectively). These findings are very typical for the medium- to long-term planning horizon (i.e., eight to nine years from now) and reflect the normal function of resource adequacy planning. As with the 2024 LTRA's findings regarding the WECC Northwest area, the potential for reserve margin shortfalls emerging in the later years of the study period is conditioned on the pace of demand growth and the pace of resource additions into the interconnection queue, not on the retirement of any specific unit.

Notably, the resource mix projections show substantial growth in solar, wind, and battery storage capacity over the study period, alongside declining coal capacity: from 5,383 MW in 2026 to 3,585 MW in 2030 on a base case basis.¹¹ This transition is reflected in and anticipated by the assessment, which does not characterize planned retirements as a reliability threat.

Conclusion

In sum, as with the 2024 LTRA, the 2025 LTRA finds that the WECC Rocky Mountain area begins from a position of strong resource adequacy, with zero probabilistic risk identified in the near term. The assessment does not call for delaying planned retirements or identify any planned retirements (including Craig 1) as a reliability concern. As explained in greater detail below in Section II, the identification of potential reserve margin shortfalls in 2034 and 2035 reflects the intended function of long-term resource adequacy planning: identifying the potential need for new resources with sufficient lead time for deliberate, coordinated action; and does not constitute evidence of a present-day or near-term emergency.

WECC's 2025 Western Assessment of Resource Adequacy

WECC releases annually the WARA report, providing a high-level, energy-based probabilistic examination of resource adequacy risks across the Western Interconnection and eight subregions over the next 10 years, examining risks across all potential hours rather than traditional peak load hour assessments only. The assessment employs a demand at risk hours (DARH) metric to evaluate resource adequacy.¹² DARH are defined as hours in which the probability that resources are inadequate to serve demand falls below 99.98%.¹³ The identification of such hours is not a prediction that load will actually be lost; rather, it is a planning signal that indicates the system is approaching conditions under which the probability of a reliability shortfall, while still very low, has increased to a level warranting attention.

¹⁰ 2025 LTRA, at 160.

¹¹ *Id.*

¹² In the 2025 assessment, WECC uses the term "loss of load hours" instead of the term used in previous assessments, "demand at risk hours." This change was made to align WECC's terminology with that used by NERC. The terms have the same meaning, which is that there is a risk of load loss under certain circumstances.

¹³ Western Assessment of Resource Adequacy Appendix, January 24, 2025, at 3.

<https://www.wecc.org/sites/default/files/documents/products/2025/2024%20WARA%20Appendix.pdf>

2024 WARA — WECC Northwest Central Subregion

The 2025 Order cited the 2024 WARA.¹⁴ As discussed in detail in the original report, the 2024 WARA did not identify the existence of a near-term resource adequacy emergency in the WECC Northwest assessment area. The 2024 assessment found no demand-at-risk hours in the three subregions roughly corresponding to the WECC Northwest area until 2031, even under the most extreme scenario in which only 55% of planned resources are built on time.¹⁵

2025 WARA — WECC Rocky Mountain Subregion

The 2026 Order cites the 2025 WARA.¹⁶ Like its predecessor, the 2025 WARA does not support the existence of a near- or medium-term resource adequacy emergency in the geographic area identified in the 2026 Order.¹⁷

Figure 2: Risk Level assessment for WECC subregions used in the 2025 Western Assessment of Resource Adequacy (Source: 2025 WARA)



Near-Term Findings

The 2025 WARA assigns the WECC Rocky Mountain subregion, where Craig is located, a normal risk classification with no identified LOLH in the near term. This means it is not subject to risk in the near-term: under all modeled scenarios, the Rocky Mountain subregion shows no loss-of-load hours through 2029.

Medium-Term Findings

In the medium term, the Rocky Mountain subregion is subject to minimal risk under the modeled scenarios. The Rocky Mountain subregion does not show loss of load in the All Additions or High Load scenarios. LOLH for the area only appear, and then only minimally, under the 85% and 67%

¹⁴ 2025 Order, at 2.

¹⁵ 2024 WARA, March 12, 2024, available at: <https://feature.wecc.org/wara/>

¹⁶ 2026 Order, at 3-4.

¹⁷ 2025 WARA, January 22, 2026, available at: <https://feature.wecc.org/2025wara/index.html>

build-out scenarios, in which 15% and 33% respectively of planned resources fail to come online as scheduled. Under the 85% build-out scenario, the Rocky Mountain subregion shows only 4 LOLHs (i.e., 4 hours with potential reliability risk) over the entire 10-year study period, with the first appearing in the summer of 2034. Under the 67% build-out assumption, which grounds WECC's most conservative scenario, the Rocky Mountain subregion still shows low risk in the medium term with the first LOLH appearing in the summer of 2030, increasing to 18 LOLHs by 2035.

Conclusion

The 2025 WARA, like its predecessor, does not support the existence of a near-term or medium-term resource adequacy crisis in the Rocky Mountain assessment area.

DOE's July Resource Adequacy Report

The DOE July 2025 Resource Adequacy Report, discussed in detail in the original report, is cited in the 2026 Order but does not strengthen the evidentiary basis for the emergency determination. As discussed in the original report, the July report analyzes resource adequacy conditions in 2030 under scenarios that assume no Tier 2 or Tier 3 generation resources are built, a highly conservative assumption inconsistent with typical electric utility planning requirements. Even under that assumption, DOE found that the non-CAISO West region had the least amount of normalized unserved energy (NUSE) of all regions analyzed. The report does not analyze near-term conditions, does not identify a resource adequacy crisis in the Rocky Mountain region, and does not support the existence of an emergency in 2026. DOE itself acknowledged that its study "could benefit greatly from the in-depth engineering assessments which occur at the regional and utility level."¹⁸ Nothing in the 2026 Order's reliance on this report adds to or changes the conclusions set forth in the original report.

Energy Information Administration Planned Additions and Retirements

The 2026 Order, like its predecessor, relies on EIA data to characterize planned generation retirements in Colorado. As discussed in detail in the original report, DOE's reliance on EIA retirement data is selective; it cites planned retirements without acknowledging that the same EIA data show substantial net generation additions in Colorado. To reiterate the numbers cited in the original report, between 2019 and 2029, EIA data forecasts approximately 4,300 MW of retirements but more than double that amount of capacity additions, with over 10,000 MW of new generation added.¹⁹ Moreover, in the 2026 Order, DOE has not corrected the mistake we identified in the 2025 Order: DOE incorrectly calculates planned coal retirements in Colorado using EIA data.²⁰ The 2026 Order's characterization of EIA data as supporting an emergency finding remains

¹⁸ "Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid," page i. U.S. Department of Energy, July 2025, <https://www.energy.gov/topics/reliability>.

¹⁹ Current Energy Group, "Resource Adequacy in the Mountain West An Assessment of Resource Adequacy Studies Following the Planned Retirement of Craig Station Unit 1" at 18 (Table 4) (Jan. 2026).

²⁰ *Id.* at 18 (Table 3).

as incomplete and misleading as in the original order, and the conclusions set forth in the original report apply with equal force here.

II. Long-Term Analyses Showing the Potential Need for Additional Resources Are a Normal Feature of Utility Resource Planning

The potential for reserve margin shortfalls identified in the later years of the 2025 LTRA and 2025 WARA study periods is not evidence of an emergency; it is evidence that resource adequacy planning is working as intended. The fundamental purpose of utility resource planning is to analyze the potential need to acquire additional resources (whether demand- and/or supply-side resources) far enough in advance to enable the utility to acquire such resources to meet future customer demand. Studies such as the LTRA and WARA, and utility integrated resource plans, are not designed to provide an iron-clad prediction that a shortage or loss of load will actually occur many years from now. Indeed, just the opposite: the purpose of long-term analyses is to provide utilities and other planners with the information they need so they can take steps to avoid a shortage many years from now.

Utilities regularly issue requests for proposals (RFPs) to acquire resources with in-service dates five to eight years in the future, reflecting the normal lead time required to plan, procure, permit, and construct new generation. Table 1 below illustrates this pattern for the major utilities in the region.

These procurement timelines demonstrate that utilities in the region are actively planning for and acquiring resources to address projected needs prior to any potential resource adequacy risks identified in the LTRA or WARA analyses materializing. The fact that a study such as the 2025 LTRA might show a potential shortfall in 2034 and beyond *if no further action is taken* does not mean that shortfall will, or is likely to, actually occur in 2034. That is because each utility in the Rocky Mountain assessment area regularly forecasts whether it will need additional resources and then procures the resources needed to meet future customer demand.

Table 1: Resource Acquisition Periods outlined in utility RFPs

Utility	Proceeding	Date initial RFP issued	Latest date in resource acquisition period	Max length of resource acquisition period
Tri-State Generation and Transmission Association, Inc.	20A-0528E ²¹	May 18, 2022	12/31/2030	7.5 years
	23A-0585E ²²	September 13, 2024	12/31/2031	7 years
Public Service Company of Colorado (Xcel)	21A-0141E ²³	December 1, 2022	12/31/2028	6 years
	21A-0141E, ²⁴ Near Term Procurement	August 29, 2025	12/31/2029	4.5 years
	24A-0442E ²⁵	Expected summer 2026	12/31/2031	5.5 years

The Order specifically cites to NERC’s 2025 LTRA, which identified the WECC Rocky Mountain Region to have “[anticipated reserve margin] that falls below the [Reference Margin Level] in Summer 2034 and 2035, and Winter 2034–35,”²⁶ for the apparent proposition that an “emergency condition” exists based on those forecasts. But a resource need identified 8-9 years into the future is very typical and does not represent a departure from standard planning practices. In fact, both NERC’s LTRAs (WECC Rocky Mountain region) and Tri-State Electric Resource Plans (ERP) have consistently identified a resource need within a similar time horizon (i.e., within 6-10 years) going back many years. Each year the identified need is generally pushed back as well, demonstrating how standard planning practices address the identified need. The tables below demonstrate the years into the future when a potential resource need was identified for several recent LTRAs and ERPs.

²¹ Colorado Public Utilities Commission (CO PUC), Proceeding No. 20A-0528E, Tri-State Generation and Transmission Association, Inc. 2020 Electric Resource Plan, Phase II Implementation Report, at 11 (RFP issuance date) and 15 (Resource Acquisition Period). Available at

https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=989882&p_session_id=

²² CO PUC, Proceeding No. 23A-0585E, Tri-State Generation and Transmission Association, Inc. 2023 Electric Resource Plan, Phase II Implementation Report, at 10 (RFP Issuance date) and 16 (Resource Acquisition Period). Available at: https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=1038782&p_session_id=

²³ CO PUC, Proceeding No. 21A-0141E, Decision No. C24-0052, paragraph 35 (RFP issuance date), available at:

https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1014518;

CO PUC, Proceeding No. 24A-0442E, Decision No. C25-0747, Paragraph 15 (Resource Acquisition Period).

Available at: https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1052251

²⁴ CO PUC, Proceeding No. 21A-0141E, 2025 Near-Term Procurement Report, Rev. 1. Available at:

https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=1054340&p_session_id=

²⁵ CO PUC, Proceeding No. 24A-0442E, Decision No. C25-0747, Paragraph 33. Available at:

https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1052251

²⁶ 2026 Order, page 3.

Table 2: Anticipated Reserve Margin Shortfalls in NERC LTRAs (WECC Rocky Mountain Region)

Year of NERC LTRA	Year when Anticipated Reserve Margin falls below Reference Margin Level	Years in Future
LTRA 2025 ²⁷	2034	9
LTRA 2024 ²⁸	2031	7
LTRA 2023 ²⁹	2032	9
LTRA 2022 ³⁰	2029	7
LTRA 2021 ³¹	2028	7
LTRA 2020 ³²	2028	8

Another trend to note from Table 2 above is that the ARM initially projected for any future year does not remain static and generally increases as the projected year draws closer. For instance, the 2020 LTRA projected a potential shortfall in 2028 that the 2025 LTRA now shows will not occur. This phenomenon is most apparent in Table 3 below, which shows the predicted 2028 Anticipated Reserve Margin increasing from 13.5% in the 2020 LTRA for the WECC NW region to 53.2% in the 2025 LTRA for the Rocky Mountain region (previously included in the WECC NW region), thereby avoiding any risk of a shortfall.

Table 3: ARM and RML in NERC LTRAs - WECC NW Region (Rocky Mountain in LTRA 2025)

	2028 Anticipated Reserve Margin	2028 Reference Margin Level	Projected Deficit/Surplus in 2028
2020 LTRA	13.5%	15.6%	-2.1%
2021 LTRA	12.8%	13.4%	-0.6%
2022 LTRA	14.8%	14.0%	0.8%
2023 LTRA	30.9%	17.4%	13.5%
2024 LTRA	29.3%	15.4%	14.1%
2025 LTRA	53.2%	16.2%	37.0%

²⁷ Available at https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf

²⁸ Available at https://www.nerc.com/globalassets/our-work/assessments/2024-ltra_corrected_july_2025.pdf

²⁹ Available at https://www.nerc.com/globalassets/programs/rapa/ra/nerc_ltra_2023.pdf

³⁰ Available at https://www.nerc.com/globalassets/programs/rapa/ra/nerc_ltra_2022.pdf

³¹ Available at https://www.nerc.com/globalassets/programs/rapa/ra/nerc_ltra_2021.pdf

³² Available at https://www.nerc.com/globalassets/programs/rapa/ra/nerc_ltra_2020.pdf

A similar trend can be observed for any year in which a shortfall is initially observed. The fact that the initial year of need continually advances over time indicates that a projected future shortfall from a single assessment is generally not actually experienced.

Over many years and many planning cycle iterations, the routine identification of future resource needs leads to subsequent procurement activities. Resource additions from those procurements serve to maintain the timing of future needs within an acceptable 6-10 year window, even while accounting for the Craig plant's retirement. Current conditions are no different. In fact, the timing of future needs presently appears to be on the upper end of this range, signifying a more robust reliability position than even in prior years.

For example, Tri-State's 2023 ERP resulted in resource procurement activities that increased the length of time for future resource needs from 6 years in 2023 to 10 years in the 2025 ERP. In other words, whereas in 2024 Tri-State predicted that it might need incremental resources six years ahead of time, Tri-State now predicts that it will not need any incremental resources for at least the next ten years.

Table 4: Anticipated Resource Needs in Tri-State ERPs

Year of Tri-State ERP	Year of Resource Need	Years in Future
2025 Plan ³³	2035	10
2024 Plan ³⁴	2030	6
2023 Plan ³⁵	2029	6
2022 Plan ³⁶	2030	8
2021 Plan ³⁷	2030	9
2020 Plan ³⁸	2029	9
2019 Plan ³⁹	2027	8
2018 Plan ⁴⁰	2026	8

³³ Available at

https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1053542&p_session_id=

³⁴ Available at

https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1032064&p_session_id=

³⁵ Available at

https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1011533&p_session_id=

³⁶ Available at https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=985193&p_session_id=

³⁷ Available at https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=961080&p_session_id=

³⁸ Available at https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=961080&p_session_id=

³⁹ Available at

<https://tristate.coop/sites/tristategt/files/PDF/resourceplan/ERP%20Annual%20Progress%20Report%202019%20%28121019%29%20%281%29%20filed.pdf>

⁴⁰ Available at

https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=894891&p_session_id=

2017 Plan ⁴¹	2025	8
2015 Plan ⁴²	2023	8

The 2026 Order's reliance on projected long-term reserve margin shortfalls as justification for an emergency action under FPA section 202(c) conflates two fundamentally different planning functions. Long-term resource adequacy assessments are designed to identify risks with sufficient lead time for deliberate action through established processes. They are not (and are not intended to be) evidence of a present-day emergency requiring extraordinary intervention. Using projections of potential shortfalls in 2034 to justify an emergency order in 2026 would render the emergency authority effectively limitless, as virtually any region with projected energy demand growth could be characterized as facing an emergency at any time.

III. National Demand Growth Narratives Do Not Establish a Resource Adequacy Emergency in the WECC Rocky Mountain Area

The 2026 Order adopts the position that absent decisive intervention, the nation's power grid will be unable to meet projected demand for manufacturing, re-industrialization, and data centers driving AI innovation.⁴³ That assertion does not provide a sufficient basis for emergency action in the WECC Rocky Mountain assessment area.

First, the load growth projections underlying the Order are subject to significant uncertainty. NERC itself acknowledges this in the 2025 LTRA, noting that "large loads inherently add volatility to load forecasts as project timelines and commitments can vary with factors related to construction, permitting approvals, grid development, and data center owner decisions."⁴⁴ Critically, the LTRA's own demand projections reflect mid-2025 data collection and do not incorporate more recent forecast revisions. NERC expressly acknowledges that both ERCOT and PJM, the two grid regions experiencing the most vigorous large-load development, have each prepared revised load forecasts since the LTRA data collection period, and that "both forecasts indicate that some large-load projects have slowed or failed to materialize within the shorter-term horizon." NERC further notes that "[l]oad forecasts that are revised downward can shrink the energy shortfalls that are projected in this LTRA," meaning the already-modest concerns identified in the LTRA may still overstate actual near-term risk. NERC further notes that in Texas, new data center demand projections have been reduced by almost 50% of their originally requested load level to reflect actual consumption behavior, and that ERCOT excludes most new large loads that have not yet entered a transmission service contract from its long-term forecast. Independent analysis corroborates this picture.

⁴¹ Available at https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=865735&p_session_id=

⁴² Available at https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=637884&p_session_id=

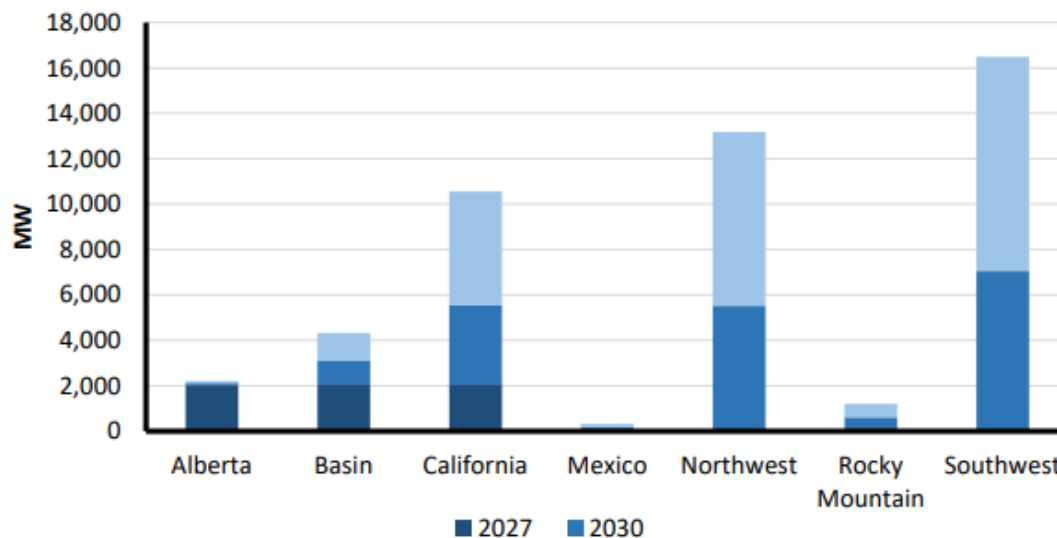
⁴³ 2026 Order, page 5.

⁴⁴ 2025 LTRA, page 9.

Sightline Climate's 2026 Data Center Outlook, tracking 777 large data center projects announced since 2024, found that 30–50% of the 2026 pipeline is unlikely to come online before the end of the year.⁴⁵ Of the at least 16 gigawatts of capacity planned for 2026, only 5 GW is currently under construction. The Order treats highly uncertain future demand as though it were a known and imminent fact, substantially overstating the evidentiary basis for emergency action.

Second, the geographic premise of the Order's demand narrative does not hold in the WECC Rocky Mountain area. The 2025 LTRA's own data confirm that large-load growth is not evenly distributed across WECC assessment areas. As shown in Figure 12 of the 2025 LTRA, reproduced below, the Rocky Mountain assessment area projects among the lowest large-load growth of any WECC region.

Figure 3: Large-Load Projection by Year in WECC Assessment Areas (Source: 2025 LTRA)



The LTRA notes that while Texas, PJM, and several WECC assessment areas are reporting steep demand increases due primarily to new data centers and large loads, the Rocky Mountain area is not among the areas with the highest projected growth. The Order's reliance on national demand growth narratives built around load centers far removed from the Rocky Mountain region does not provide a sufficient evidentiary basis for finding a resource adequacy emergency in the specific Rocky Mountain assessment area the 2026 Order purports to address.

⁴⁵ Catherine Boudreau, "Up to Half of the World's Data Centers May Be Delayed This Year," Latitude Media, February 27, 2026, available at <https://www.latitudemedia.com/news/up-to-half-of-the-worlds-data-centers-may-be-delayed-this-year/>.

Conclusion

Like its predecessor, the 2026 Order relies on a set of sources that do not support the existence of an emergency in the relevant assessment area.

The 2025 LTRA assigns the WECC Rocky Mountain region its lowest possible risk classification, normal risk, with zero probabilistic risk identified in the near term. The 2025 WARA assigns the Rocky Mountain subregion normal risk, identifies no near-term demand-at-risk hours in the subregion, and concentrates its identified risks in the Northwest and Basin subregions. DOE's July 2025 Resource Adequacy Report does not analyze near-term conditions and, even under highly conservative assumptions, does not find evidence of a crisis in the Rocky Mountain region. And EIA data, relied upon selectively by DOE, show that planned generation additions in Colorado substantially exceed planned retirements over the relevant period.

The 2026 Order introduces one notable change from its predecessor: a shift in geographic framing from the WECC Northwest to the WECC Rocky Mountain assessment area. This change reflects NERC's updated assessment area boundaries and does not support the Order's conclusion that an emergency exists. The WECC Rocky Mountain region, like the WECC Northwest area before it, is not facing a near-, medium-, or long-term resource adequacy crisis by any measure.

The reserve margin shortfalls projected for 2034 and beyond reflect the normal and intended function of long-term resource adequacy planning, identifying the potential need for utilities to acquire additional resources (if current demand projections prove to be accurate) with sufficient lead time for deliberate, coordinated action. Colorado utilities are already responding through competitive resource acquisition processes with in-service timelines extending to 2029-2031, demonstrating that the planning process is functioning as designed. The identification of the potential need for new resources so far in the future that it falls outside the number of years that utilities acquire resources in advance is not evidence of a present-day emergency; instead, it is a part of a system that informs utilities whether they might need to acquire additional resources in the future.

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BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-186
Public Interest Organizations' January 2026 Rehearing Request

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order:
Tri-State Generation and Transmission Association,
Platte River Power Authority, Salt River Project,
PacifiCorp, and Xcel Energy

Order No. 202-25-14

Motion to Intervene, Motion for Clarification and Request for Rehearing and Stay of
Sierra Club, GreenLatinos, Vote Solar, Public Citizen, and Environmental
Defense Fund (collectively, “Public Interest Organizations”)

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I. INTRODUCTION

The Department of Energy (“Department”) is unlawfully using Section 202(c) of the Federal Power Act to prevent the retirement of Craig Unit 1 (“Craig”). Craig generates power by burning coal, and 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.

Order No. 202-25-14 (the “Order”) offers no lawful basis, rational reasoning, or evidentiary support for an emergency justifying the invocation of Section 202(c). In purporting to find an emergency in seven states—Colorado, Idaho, Montana, Oregon, Utah, Washington, and Wyoming—the Department focuses on changes to the mix of generators. Generators burning coal and other fossil fuels are retiring, but are being replaced by new resources, including solar, wind, and battery resources. Replacing dirty, expensive, and unreliable plants with modern technology is not an emergency. It is, instead, a result of market forces and prudent planning.

None of the sources the Department cites in the Order, collectively or separately, support the claimed near-term or long-term emergency. The Department looks for support from the 2024 Long-Term Reliability Assessment published by the North American Electric Reliability Corporation (“NERC”), but that document finds “negligible unserved energy and load-loss risk” in a region that encompasses the Department’s seven-state emergency and extends further to parts of other states. The Department also turns to the 2024 Western Assessment of Resource Adequacy from the Western Electricity Coordinating Council (“WECC”). That report finds zero hours in which demand is at risk in 2026 (and almost zero hours in 2027) in another large footprint subsuming and extending beyond the area in which the Department claims an emergency. The Department also cites a couple of executive orders containing no relevant facts, as well as its own error-riddled and widely panned study that attempts to evaluate resource adequacy in 2030. Further, in reaching for data about the mix of generators in a single state (Colorado) to support its purported seven-state emergency, the Department looks only at one side of the coin, focusing on planned retirements with no attention paid to planned additions. In fact, Colorado has added, and plans to add, more generating capacity than has been and will be retired, resulting in a significant net increase in generating resources. And the Department somehow commits an even more basic error; in pulling data from its own Energy Information Administration, the Department overstates what that data says about the amount of planned coal retirements by more than 900 MW.

Meanwhile, the Department fails to consider a multitude of evidence that the Department is or should be aware of. This list begins with the careful and detailed resource planning undertaken by all five of Craig’s co-owners: Tri-State Generation and Transmission Association (“Tri-State”), Platte River Power Authority (“Platte

River”), Salt River Project, PacifiCorp, and Xcel Energy (also known as Public Service Company of Colorado) (“Xcel”) (collectively, the “Craig Co-Owners”). For nearly a decade, the Craig Co-Owners have been planning to retire Craig on December 31, 2025, and otherwise ensure resource adequacy. The Department devotes not a word to these efforts.

More broadly, the Department fails to address a host of studies and monitoring from state regulators, regional entities, and private utilities. These efforts undercut the Department’s claimed emergency. The evidence shows that the established planning and monitoring efforts are resulting in sufficient supplies of electricity now and will continue to provide for resource adequacy and reliability through the end of the decade and beyond, particularly as planned resources enter service. Two sources omitted from the Order, the 2025–2026 Winter Reliability Assessment and a presentation from a private consultancy, actually appear in another (unlawful) Section 202(c) order issued two weeks earlier. The Department’s failure to engage these studies and efforts while reaching sweeping, unsupported conclusions is not reasoned decision-making.

Indeed, the Department itself undercuts the emergency claim. In recent orders, the Department allows electricity exports from the Pacific Northwest to Canada upon “find[ing] 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” and recounting 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.” Research Power Corp., Order No. EA-365-C at 4–6 (Oct. 21, 2025), <https://www.energy.gov/gdo/ea-365-c-research-power-corporation>; see Dep’t of Energy, Export Authorization Library (last visited Jan. 28, 2026), <https://www.energy.gov/gdo/export-authorization-library>. The Department makes no attempt to reconcile the Order with its views of just a few months ago.

And whatever needs our modern energy system has, Craig is not the answer. The plant is an old, dirty, expensive generator that is required to retire under Colorado law. Running Craig after December 31, 2025, violates state law and plagues the region with excessive amounts of harmful air pollution that clouds Colorado’s treasured federal public lands in haze, including Rocky Mountain National Park, Flat Tops Wilderness Area, Eagles Nest Wilderness Area, Mount Zirkel Wilderness Area, and Rawah Wilderness Area. Pollution from Craig also causes premature deaths and tens of millions of dollars in health harms. Ex. 1-123 at PDF 5 (EPA COBRA Health Effects Estimate).

“All costs” incurred by the Craig Co-Owners to comply with the 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), [4](https://www.msn.com/en-</p></div><div data-bbox=)

us/money/markets/who-s-paying-to-keep-coal-plant-alive-all-electricity-customers-trump-advisor-says/ar-AA1UdRHI. Tri-State avers that the Order is likely to require additional expenditures “in operations, repairs, maintenance and, potentially, fuel supply, all factors increasing costs,” and that the utility “is working to prepare filings in support of cost recovery.” *Tri-State Makes Craig Generating Station Unit 1 Available to Operate in Compliance with DOE Emergency Order* (Jan. 23, 2026), <https://tristate.coop/tri-state-makes-craig-generating-station-unit-1-available-operate-compliance-doe-emergency-order>.

Craig’s inability to operate reliably and economically is plainly apparent but not addressed in the Order. Craig’s operator and co-owners have substantially reduced capital and major maintenance expenditures over the past few years in anticipation of retirement. As a result, the plant would require tremendous maintenance and investment to function consistently. In fact, Craig was broken when the Department issued the Order, having suffered a mechanical failure that halted electricity generation. Tri-State, *U.S. DOE Orders Tri-State to Keep Craig Generating Station Unit Operating for Next 90 Days* (Dec. 31, 2025), <https://tristate.coop/us-doe-orders-tri-state-keep-craig-generating-station-unit-operating-next-90-days>.

The Order was not requested by the Craig Co-Owners or any of their state-level regulators. The Order, issued just a day before Craig’s long-planned retirement, is a hasty and ill-advised eleventh-hour maneuver that stands in opposition to years of meticulous and coordinated planning. The Department lacks authority to override the states’ and utilities’ decisions to retire the plant and bring on cleaner and cheaper resources.

The Order is costly, harmful, unnecessary, unwanted, and unlawful. Public Interest Organizations respectfully request that the Department grant intervention in the proceedings over the Order; stay the Order; grant clarification of the Order; grant rehearing of the Order; rescind the Order (and any renewals of the Order); and allow Craig to retire.

II. STATEMENT OF ISSUES AND SPECIFICATION OF ERROR

The undersigned Public Interest Organizations move to intervene and request clarification (see *infra* sec. V.D.3), rehearing, and a stay pursuant to Section 313(a) of the Federal Power Act, 16 U.S.C. § 825l(a), and the applicable rules of practice and procedure, 18 C.F.R. §§ 385.203, .212, .214, .713; see Ex. 1-10 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.”).¹ 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 the Western Electricity Coordinating Council Northwest assessment area as defined in the Order, or in any other area, 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*, 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 Order did exist—it does not—the Department has not demonstrated a reasoned basis for its determination that requiring the Craig Co-Owners to make Craig available to operate at the direction of two specified entities will “best meet the emergency and serve the

¹ 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. 1-11) [hereinafter “DOE Rehearing Procedures”]. The Department maintains another website that 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. 28, 2026), <https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority> (attached as Ex. 1-12) [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.

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 Order exceeds the Department’s authority in its availability requirement and its decree concerning whether Craig shall be considered a capacity resource. *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 Order requires 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); Ex. 1-13 (DOE Order No. 202-22-4); Ex. 1-14 (Department Order No. 202-17-4 Summary of Findings); Ex. 1-21 (Department Order No. 202-26-01); Ex. 1-22 (Department Order No. 202-26-01A); Ex. 1-24 (Department Order No. 202-24-1).

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 this proceeding. Each party may therefore intervene in this proceeding. 18 C.F.R. § 385.214; *see* Ex. 1-11 (DOE Rehearing Procedures); Ex. 1-12 (DOE 202(c) Webpage); Ex. 1-10 (Cooke Email to Alle-Murphy).

Each of the Public Interest Organizations also demonstrates a concrete injury arising from the Order that is redressable by a favorable outcome. Each organization

is therefore aggrieved by the Department's Order and may properly apply for rehearing. *See* 16 U.S.C. § 825l(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. 1-11 (DOE Rehearing Procedures); Ex. 1-12 (DOE 202(c) Webpage); Ex. 1-10 (Cooke Email to Alle-Murphy).

A. Sierra Club

Sierra Club has a demonstrated organizational commitment to reducing pollution and harm from coal-fired power plants, including Craig. Sierra Club's Beyond Coal Campaign seeks to reduce the pollution currently being produced by coal-fired power plants such as Craig, and to reduce energy bills by ensuring that ratepayers do not fund the cost of continuing to operate uneconomic coal plants like Craig. To those ends, Sierra Club has long engaged in advocacy relating to Craig Station. Sierra Club has intervened in Tri-State's electric resource plans before the Colorado Public Utilities Commission (the "Colorado Commission") in order to ensure that the retirement of Craig remained on track and was part of Tri-State's approved resource plan. Craig's retirement has been a premise of much of Sierra Club's work in Colorado.

Craig is owned by five utilities that serve electric customers in several states, including Arizona, Colorado, New Mexico, Utah, and Wyoming. In each of these states, Sierra Club has members who receive electricity service from a utility that owns Craig. For example, Sierra Club has over 15,000 members in Colorado, including members who receive electricity from Xcel, Tri-State, or Platte River. The Order harms Sierra Club's members' financial interests, because they will likely have to pay their share of the costs to comply with the Order.

In addition, Sierra Club has members who live, work, and/or recreate in areas of Colorado that are affected by air pollution from Craig. The Order will harm Sierra Club's members' aesthetic, health, and environmental interests by leading to increased air emissions that will pollute scenic areas, harm human health, and impair air quality.

B. GreenLatinos

GreenLatinos is a national nonprofit organization that convenes a broad coalition of Latino leaders committed to addressing environmental, natural resources, and conservation issues that significantly affect the health and welfare of the Latino community. GreenLatinos engages in this advocacy at the national, regional, and local levels. It strives to amplify the voices of minority, low-income, and tribal communities and to advance health equity, environmental justice, and community resilience. GreenLatinos has members throughout Colorado, including members who live, work, and/or recreate in areas that are affected by air pollution from Craig. GreenLatinos also has members who are customers of the utilities that purchase

electricity from Tri-State Generation and Transmission Association and customers of Craig's other co-owners.

Pollution emitted by Craig harms GreenLatinos' members, and the Order will harm these members by preventing the coal unit from retiring as planned and thus prolonging the time period it can generate electricity and emit pollution into nearby communities. In addition, GreenLatinos' members will likely be harmed by the Order because Tri-State and the other Craig co-owners will incur increased costs to keep Craig online after its current retirement deadline. The customers of the utilities that purchase electricity from Tri-State and customers of the other co-owners, including GreenLatinos' members, will likely be responsible for paying these costs and will pay higher utility bills because of the Order. GreenLatinos and its members have an interest in ensuring that Tri-State retires Craig as planned, and the Order extending the life of this coal unit harms GreenLatinos' and its members' interests.

C. Vote Solar

Vote Solar is an independent nonprofit organization working to repower the United States with clean energy by making solar power more accessible and affordable through effective policy advocacy. Vote Solar seeks to promote the development of solar at every scale, from distributed rooftop solar to large utility-scale solar facilities, and to encourage common-sense electrification of the economy, all as part of the transition away from fossil fuel-powered energy consumption. Vote Solar has over 92,000 members nationally and nearly 3,000 members in Colorado, including members who are customers of the utilities that purchase electricity from Tri-State Generation and Transmission Association and customers of Craig's other co-owners. Vote Solar is not a trade group, and it does not have corporate members.

Pollution emitted by Craig harms Vote Solar's members, and the Order will harm these members by preventing the coal unit from retiring as planned and thus prolonging the time period it can emit pollution into nearby communities. In addition, Vote Solar's members will likely be harmed by the Order because Tri-State and the other Craig co-owners will incur increased costs to keep Craig online after its current retirement deadline. The customers of the utilities that purchase electricity from Tri-State and customers of the other co-owners, including Vote Solar's members, will likely be responsible for paying these costs and will pay higher utility bills because of the Order. Vote Solar and its members have an interest in ensuring that Tri-State retires Craig as planned, and the Order extending the lives of these coal units harms Vote Solar's and its members' interests.

D. 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 Colorado and the Western United States. 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 Defense Fund

The Environmental Defense Fund (“EDF”) is a nonprofit membership organization with hundreds of thousands of members nationwide, including approximately 10,000 members who live in Colorado and pay for and consume electricity in the state, and who are harmed by pollution from Craig’s coal-burning operations. EDF’s mission is to build a vital Earth for everyone by preserving the natural systems on which all life depends. Guided by expertise in science, economics, law, and business partnerships, EDF seeks practical and lasting solutions to address environmental problems and protect human health, including in particular by addressing pollution from the power sector. On behalf of its members, EDF works with partners across the private and public sectors to engage in utility regulatory forums at the federal level and throughout the United States to advocate for policies that will create an affordable, reliable, and low pollution energy system. Craig’s retirement would help create an affordable, reliable, and low pollution energy system. Because the Order denies these and other benefits of the plant’s retirement, the Order harms EDF members.

IV. BACKGROUND

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

Multiple entities in Colorado and the WECC Northwest assessment area² have consistently maintained resource adequacy in the region through a combination of resource adequacy assessments and long-term planning. Resource adequacy is “the situation where an electric system has enough capacity available to meet customer

² The Order claims an emergency exists “within the Western Electricity Coordinating Council (WECC) Northwest assessment area.” Order at 1. The Order employs only one regional definition of WECC Northwest. *Id.* (“In its 2024 Long-Term Reliability Assessment (LTRA), the North American Electric Reliability Corporation (NERC) notes that in the WECC Northwest assessment area, which includes Colorado, Idaho, Montana, Oregon, Utah, Washington, and Wyoming . . .”). All references in this filing to “WECC Northwest” or “WECC Northwest assessment area” refer to that area. Note, though, that other regional assessments use their own definition of the Northwest region. *See generally* Ex. 1-01 at PDF 9–18, 21, 30–32, 36–62 (Current Energy Group Report) (collecting regional assessments).

demand, plus a reserve margin on top, in most hours under most conditions based on a chosen standard.” Ex. 1-01 at 2–6 (Current Energy Group Report) (defining resource adequacy and including perspective from National Laboratory of the Rockies). The electric industry uses a variety of metrics to assess resource adequacy, though each metric gets to the same concept: whether there are sufficient resources available to both meet forecasted demand and provide an additional buffer. *See id.* However defined or measured, the entities and processes discussed below have for decades maintained an interconnected planning web that has sustained, and continues to sustain, resource adequacy across the region. That includes, of course, accounting for declared retirements, including Craig’s long-planned retirement.

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 or sale of electric energy, and the non-emergency interconnection of facilities for the generation, transmission, and sale of electric energy. *Id.* § 7172(a)(1)(B). The Department’s authority over functions of “the Commission” in the Federal Power Act include functions under some subsections of Section 202 of the Act. *See id.* § 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. *See Fed. Energy Regul. Comm’n 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 Independent System Operators 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. 1-19 at 53 (FERC Energy Primer). Some Independent System Operators “also operate capacity markets, which, along with underlying resource adequacy rules, ensure sufficient capacity is available.” *Id.* at 68.

The 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 Independent System Operators.

Figure 1: Boundary Areas of RTOs and ISOs



Source: Ex. 1-19 at 67 (FERC Energy Primer).

Although there are currently no RTOs in much of the WECC Northwest assessment area, as discussed further below, there are entities that have taken on some of the regional coordination roles and responsibilities that RTOs provide in other parts of the country.

2. 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 3.

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).

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. *Id.* § 824o(b)(1); 18 C.F.R. §§ 39.2, 40.1(a), 40.2(a); *see id.* § 39.1 (defining “Bulk–Power System”). Each reliability standard identifies the types of entities that must comply with the standard, like 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. 1-117 (NERC Emergency Operations) (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”).

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* 18 C.F.R. § 39.11. 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* Ex. 1-28 at PDF 75, 124, 170, 218 (2019–24 NERC Summer Reliability Assessments). NERC’s determination of “elevated” risk generally indicates that there is a “[p]otential for insufficient operating reserves in above-normal conditions.” Ex. 1-27 at 6 (NERC 2025 Summer Reliability Assessment). An elevated risk does not constitute 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. *See id.* at 10. NERC typically provides specific context and details associated with its determination. *See id.* at 17–39.

NERC also delegates certain authorities to six Regional Entities that make up the Electric Reliability Organization Enterprise. Ex. 1-149 at 1 (“About WECC” Webpage). The largest of these, the Western Electricity Coordinating Council (“WECC”), is one of the key regional actors described below working to ensure that the power grid remains reliable. *Id.* at 1–2.

3. The Utilities that Own and Operate Craig Protect Reliability and Resource Adequacy in Their Service Territories.

The five utilities that own and operate Craig have service territories spanning a significant portion of the Western United States. Tri-State is a wholesale electric cooperative that provides electricity to retail cooperatives in Colorado, New Mexico, Wyoming, and Nebraska. The geographic footprint of the Tri-State members is shown in Figure 2.

Figure 2: Tri-State Members



Source: Ex. 1-114 at 2 (Tri-State Members).

PacifiCorp serves customers in Washington, Oregon, California, Idaho, Utah, and Wyoming. Ex. 1-124 at 1 (2025 PacifiCorp_FactSheet). Salt River Project serves customers in Arizona. Ex. 1-125 at 1 (Service Area and Territory (Electric Power and Water) SRP). Platte River and Xcel serve customers in Colorado. Ex. 1-126 (Xcel, List of Towns Receiving Electric Service in Colorado), Ex. 1-127 (Who we serve - Platte River Power Authority).

The resource adequacy responsibility of the Craig Co-Owners can be broken down into two separate categories: responsibilities of the utilities that serve as balancing authorities; and their responsibilities as load-serving entities, i.e., entities that provide electricity directly to retail customers, and/or their responsibilities as wholesale providers that generate and transmit electricity to other retail utilities.

Currently, none of the Craig Co-Owners is a member of an RTO. Xcel is the balancing authority covering a portion of its service territory (along with the territory served by Platte River). Other portions of Xcel's system, as well as portions of Tri-State's load in the Western Interconnection, are in the Western Area Power Administration balancing authority. Balancing authorities perform many of the functions that RTOs perform, including balancing supply with demand and dispatching generation. See Ex. 1-115 (Department Explainer on Balancing Authorities) at *passim*; Ex. 1-116 at 1 (EIA Explainer on Balancing Authorities).

Four of the five Craig Co-Owners are load-serving entities that provide electricity directly to retail customers. The fifth, Tri-State, is a wholesale provider with obligations to meet the demand of its member cooperatives.

The utilities meet their reliability requirements through a variety of overlapping processes. At one end of the spectrum is long-term resource planning, which each utility conducts through resource planning. Platte River prepares and adopts an Integrated Resource Plan ("IRP") every four years. Tri-State and Xcel submit Electric Resource Plans ("ERPs") at least every four years for the Colorado Commission to

approve. PacifiCorp prepares an IRP every two years, which it submits to state commissions in its service territory. Salt River Project updates its IRP every five years. While the cadence varies, each resource plan is, at its core, an exercise in forecasting electricity demand on a long-term basis and then adopting a plan to acquire the quantity of generating, storage, and demand-response resources needed to reliably serve forecasted demand.

Each utility also has various processes for acquiring resources on a shorter-term basis than is possible through an IRP. These processes include short-term purchases made on a seasonal basis; day-ahead purchases; and, at the shortest extreme, purchases made on an intra-hour basis through energy imbalance markets. For example, in its December 2025 Near Term Procurement Report, Xcel indicated it had made seasonal purchases of capacity for the winter and summer seasons in 2026. Ex. 1-93 at 29 (Table 8) (Xcel 2025 Near Term Procurement Report).

The utilities also participate in reserve-sharing agreements that allow them to call upon resources to deal with very short-term resource needs. For example, Salt River Project and Xcel participate in the Northwest Power Pool Reserve Sharing Group:

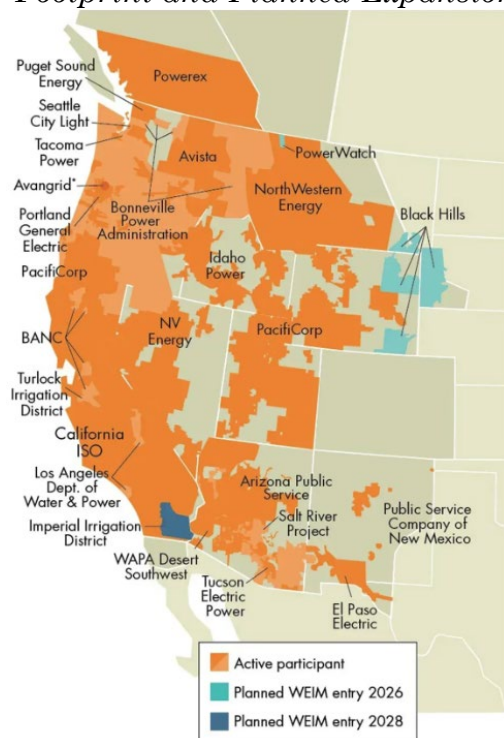
Along with participating in the [Western Area Power Administration] Balancing Authority, [Xcel] entered the [Northwest Power Pool] Reserve Sharing Program in September 2019. The [Northwest Power Pool] Reserve Sharing Program Agreement provides for sharing of contingency operating reserves among interconnected electric utilities operating in the Western Interconnection. There are presently 22 participating Balancing Authorities in the [Northwest Power Pool] Reserve Sharing Program. By pooling their contingency reserves, these utilities are able to carry less contingency reserve capacity than if they operated independently. Under the [Northwest Power Pool] Reserve Sharing Program Agreement, [Xcel] can call on and purchase contingency reserves (spinning and non-spinning), and the energy associated with such reserves, when they are activated in response to a sudden system disturbance. [Xcel] can also purchase emergency assistance under the [Northwest Power Pool] Reserve Sharing Program Agreement.

Ex. 1-94 at 118 (Xcel 2024 JTS, Volume 2 Technical Appendix).

Finally, each of the Craig Co-Owners participates in an energy imbalance market that allows the utility to purchase and sell energy on an intrahour basis to balance supply and demand on a short-term basis. Xcel, Platte River, and Tri-State participate in the Western Energy Imbalance Service (“WEIS”) operated by the Southwest Power Pool. Ex. 1-112 at 1 (WEIS—Southwest Power Pool). PacifiCorp and Salt River Project participate in the Western Energy Imbalance Market operated by

the California Independent System Operator. Ex. 1-111 at 2 (Western Energy Imbalance Market Webpage). The footprint of the Western Energy Imbalance Market and its planned expansion is shown in Figure 3 below.

Figure 3: Western Energy Imbalance Market Footprint and Planned Expansion

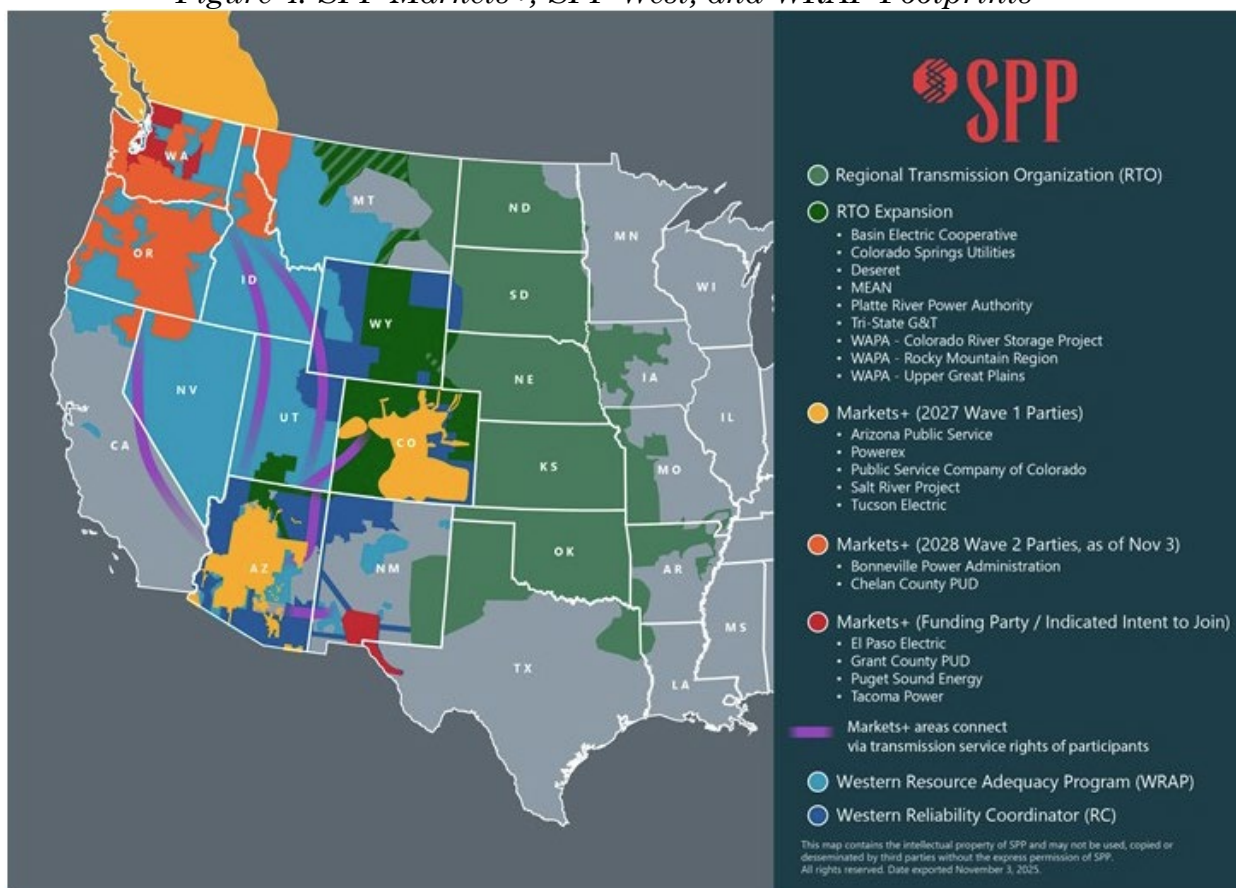


Source: Ex. 1-111 at 2 (Western Energy Imbalance Market Webpage).

Several of the Craig Co-Owners have plans to participate in organized energy markets beyond energy imbalance markets. Xcel and Salt River Project intend to join SPP's day-ahead energy market, called "Markets Plus" or "Markets+," in 2027. Ex. 1-167 at PDF 3 (SPP Markets+ Website). Under Markets+, SPP will perform centralized commitment and dispatch on a day-ahead and real-time basis for participating utilities. *Id.*

Effective April 2026, Tri-State and Platte River plan to join the western expansion of the SPP RTO, called SPP West. Ex. 1-161 at 1 (SPP West Press Release). Under SPP West, SPP would not only perform the centralized dispatch and unit commitment functions that it will perform in Markets Plus, but would also perform other reliability services for Tri-State, Platte River, and other Western utilities, such as transmission planning and assuming the role of balancing authority and reliability coordinator. These plans are shown in Figure 4 below.

Figure 4: SPP Markets+, SPP West, and WRAP Footprints



Source: Ex. 1-167 at PDF 2 (SPP Markets+ Website).

4. State and Regional Regulatory Bodies Protect Resource Adequacy Through Integrated Resource Planning and Annual Capacity Demonstration Requirements.

As noted above, state public utility commissions in the following states regulate at least one of the Craig Co-Owners: California, Colorado, Idaho, Oregon, Utah, Washington, and Wyoming. All seven of these state commissions have reviewed resource plans stating that Craig would retire by December 31, 2025. *See infra* sec. V.A.3.iii. None of these seven state commissions has expressed any concern regarding retiring Craig by December 31, 2025. No state commission has directed any of the Craig owners to operate Craig past 2025. The attached report from Telos Energy describes the role of the Colorado Commission in ensuring resource adequacy and reliability for two of the Craig Co-Owners, Xcel and Tri-State. Ex. 1-5 at 7–9 (Telos Energy Report). Washington State’s resource adequacy protocols are discussed *infra* sec. IV.A.4.v.

Additionally, within the Northwest region, there are at least three principal entities whose responsibilities include analyzing resource adequacy and reliability,

as well as proactively working to ensure that the region meets energy demand with sufficient generating resources.

1. The Northwest Power & Conservation Council (“Power Council”) develops a regional power plan, which directs how Bonneville Power Administration (“Bonneville”) markets federal hydropower and other electricity resources to utilities and other customers primarily within the Northwest and also to other buyers in the Western Interconnection.
2. The Western Power Pool provides a mechanism for load-serving entities to share resources and work together to minimize the risk of service interruptions during emergency events and has for years been developing regional resource adequacy coordination.
3. And as discussed above, WECC is the regional entity (under authority delegated by NERC) responsible for generating regional reliability standards, enforcing the standards, and assessing regional resource adequacy.

In addition to these three regional planning entities, Bonneville itself is responsible for ensuring the stability of its own system. Bonneville is a Power Marketing Administrator within the Department of Energy that markets power from hydroelectric and other generators with a service territory in Washington, Oregon, Idaho, and parts of Nevada, Montana, and Wyoming. *See* Ex. 1-131 at 5 (FERC Western Energy Markets Explainer). Bonneville’s planning guides multiple load-serving entities across the region in their efforts to plan for resource adequacy and ensure their system’s stability. Between these entities’ processes, which are further described below, there is no shortage of planning that goes into ensuring that the Northwest has sufficient energy to service customers.

i. Northwest Power & Conservation Council Develops a Regional Power Plan, Including a Resource Adequacy Analysis.

One distinguishing feature of the Pacific Northwest electric grid is the Northwest Power and Conservation Council, which provides much of the regional coordination and joint planning that RTOs provide in other regions of the country. The Power Council was created pursuant to the Northwest Power Act, 16 U.S.C. § 839, which authorizes Idaho, Montana, Oregon, and Washington to form an interstate compact to develop a regional power plan and a fish and wildlife program that balances the Northwest’s environment and energy needs. The Power Council is comprised of two members appointed by each member state. The Northwest Power Act specifically requires that the plan includes an energy demand forecast of at least twenty years, developed in consultation with Bonneville, state ratemaking agencies, utilities, and the public. 16 U.S.C. § 839b(e)(3)(D). This forecast must include regional reliability and reserve requirements, as well as resource acquisition recommendations issued to Bonneville to comply with the reliability and reserve requirements. *Id.*

§ 839b(e)(3)(D). And the law directs planners in the region to “give priority to resources which the Council determines to be cost-effective. Priority shall be given: first, to conservation; second, to renewable resources; third, to generating resources utilizing waste heat or generating resources of high fuel conversion efficiency; and fourth, to all other resources.” *Id.* § 839b(e)(1).

As the organization resulting from this mandate, the Power Council is tasked with developing the regional power plan. Ex. 1-132 at 3 (Power Council Overview). Bonneville funds the Power Council’s work. 16 U.S.C. § 839b(c)(10)(A). Bonneville must follow the regional power plan developed by the Power Council when acquiring resources. *Id.* § 839b(d)(2). As required, the Power Council’s power plan looks forward 20 years, with revisions every five years; the most recent iteration was the Eighth Power Plan of 2021. Ex. 1-133 (Power Council 2021 Power Plan). The Power Council is slated to release the Ninth Power Plan in mid-2026 and to adopt it by the end of the year. Ex. 1-132 at 2 (Power Council Overview).

Beginning in fiscal year 2023, the Power Council’s staff adopted a new, more sophisticated way to test whether the region’s power grid has adequate resources by using multiple metrics.³ Ex. 1-134 at 1 (Overview of Power Council’s Resource Adequacy Approach). The Power Council’s multi-metric approach allows it to understand the probability, shape, and size of adequacy issues. *Id.* The Power Council also continues to update its approach to load forecasting. *See* Ex. 1-135 at 1 (Overview of Power Council’s Approach to Load Forecasting).

In 2024, the Power Council published a power supply adequacy assessment that looked forward to 2029 and explored how the Council’s 2021 Power Plan supported the regional system in an adequate manner. Ex. 1-137 at 6 (Power Council 2029 Power Supply Adequacy Assessment). The Council used an adequacy model called GENESYS to simulate the regional power system to detect potential shortfalls each year from 2024 through 2029. *Id.* The analysis was based on a number of resource acquisition scenarios and load demands, including scenarios reflecting a rapid uptick in the number of data centers sited in the region. *Id.* at 7. The outcomes of each model were then scored against a set of metrics, including the frequency, duration, and

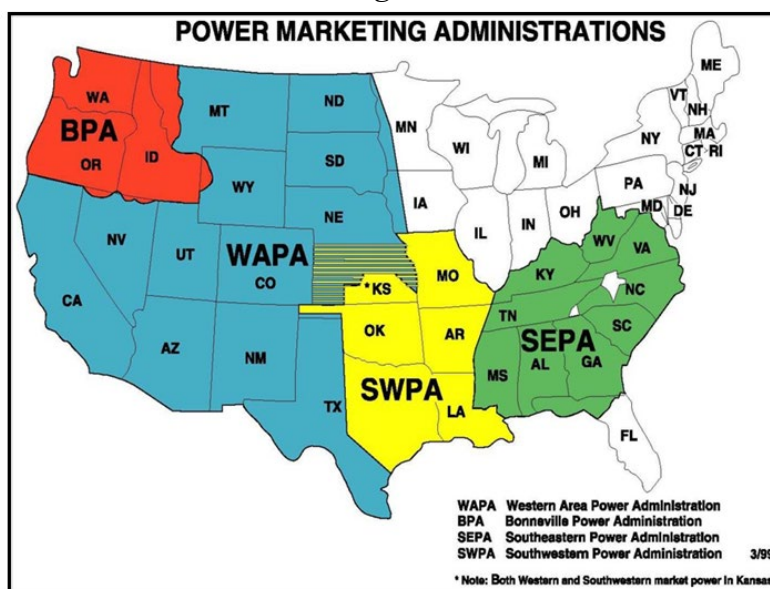
³ Current Energy Group’s report describes and distinguishes between Loss of Load Expectation (LOLE), which measures loss-of-load events per year; Loss of Load Probability (LOLP), which measures loss-of-load events per grid-straining event; Demand-at-Risk Hours (DARH), which measures the number of hours during which load loss is possible; and other metrics. *See* Ex. 1-01 at 3–6, 9–10 (Current Energy Group Report); *see also* Ex. 1-136 at *passim* (WECC Explainer) (discussing probabilistic assessments and the one-day-in-ten-years standard); *see generally* Ex. 1-25 at 3–5, 23–24, 55 (MISO LOLE Presentation) (discussing loss of load expectation calculations).

magnitude of shortfall events. *Id.* at 6–7. This methodology has allowed the Power Council to comprehensively assess the system’s resource adequacy. *Id.* at 9–10.

ii. Bonneville Forecasts Regional Demand and Supply on an Annual Basis.

Bonneville is one of the two Western Power Marketing Administrators within the Department of Energy, the other being the Western Area Power Administration. Ex. 1-131 at 5 (FERC Western Energy Markets Explainer). Bonneville’s service territory includes Washington, Oregon, Idaho, and parts of Nevada, Montana, and Wyoming, *id.* at 5, as shown below in Figure 5.

*Figure 5: Boundary Areas of
Power Marketing Administrations*



Source: Ex. 1-131 at 5 (FERC Western Energy Markets Explainer).

Bonneville markets about one-third of the power generated in the Pacific Northwest from a series of federally owned hydroelectric dams in the Columbia Basin and a nuclear power plant in Southeast Washington. Ex. 1-138 at 1 (Bonneville 2024 Fact Sheet). It also owns, operates and maintains more than 15,000 circuit miles of the Northwest’s high voltage transmission grid. *Id.* It sells the bulk of this power to public power utilities, federal agencies, and Tribal utilities in the region, which are Bonneville’s “preference” customers. *Id.*; see 16 U.S.C. § 832c(a). It also sells power to investor-owned utilities like PacifiCorp and Portland General Electric, and to certain industrial customers. Ex. 1-138 at 1 (Bonneville 2024 Fact Sheet); see 16 U.S.C. § 839c(b)(1). In addition, Bonneville currently engages in bilateral trading within and outside its service area as needed to balance its load and meet demand. Ex. 1-139 at 7 (Bonneville Day-Ahead Market Policy).

Bonneville must exercise its responsibilities “in accordance with the provisions of the [Northwest Power Act].” 16 U.S.C. § 839b(a)(2)(A). These responsibilities include (1) “to assure the Pacific Northwest of an adequate, efficient, economical, and reliable power supply;” (2) to encourage “the development of renewable resources within the Pacific Northwest;” (3) “to protect, mitigate and enhance the fish and wildlife . . . of the Columbia River and its tributaries[;]” and to (4) “provid[e] environmental quality[.]” *Id.* § 839.

Every year, Bonneville publishes a 10-year “Loads and Resources Study”—which it calls the “White Book”—for the Pacific Northwest region. *E.g.*, Ex. 1-140 (2023 Bonneville “White Book”); Ex. 1-141 (2024 Bonneville “White Book”); Ex. 1-142 (2025 Bonneville “White Book”). Bonneville’s forecasting includes analysis of the effects of varying water conditions over the 10-year period. *See, e.g.*, Ex. 1-142 at 9 (2025 Bonneville “White Book”). Every other year, Bonneville uses its latest forecast to conduct a comprehensive resource assessment in which load needs and market resource availability are analyzed to inform Bonneville’s own resource portfolio. *E.g.*, Ex. 1-143 at *passim* (Bonneville Resource Plan (compiled 2022 & 2024)). Although these are not necessarily formal resource adequacy projections, these forecasts help guide planning across the region and are a critical piece of the regional coordination that maintains grid reliability. *See* Ex. 1-144 at PDF 2 (Power Council 2024 Resource Program Results).

Bonneville also performs other functions. As a Balancing Authority, Bonneville (like the Western Area Power Administration) ensures that supply and demand are balanced in real time. *See* Ex. 1-116 at *passim* (EIA Explainer on Balancing Authorities). Bonneville also acts as a transmission provider in the region. *See Seminole Elec. Coop., Inc. v. FERC*, 861 F.3d 230, 237 (D.C. Cir. 2017).

iii. The Western Power Pool Is Implementing a Western Resource Adequacy Program and Forecasts Regional Resource Adequacy on an Annual Basis.

The Western Power Pool is a grouping of utilities and partners that coordinate and share resources in the Western Interconnection. Ex. 1-131 at 10 (FERC Western Energy Markets Explainer). The Western Power Pool’s territory stretches from British Columbia and Alberta through all or parts of 11 different states, including Washington, Oregon, Idaho, and Montana, *id.* at 9–10, as shown in Figure 6 below.

Figure 6: Boundary Area of Western Power Pool



Source: Ex. 1-131 at 9 (FERC Western Energy Markets Explainer).

The Western Power Pool organizes multiple programs to ensure that participants are protected against emergency events that would otherwise disrupt service or lead to blackouts. For instance, it operates a reserve sharing program, in which participating Balancing Authorities share contingency reserves to ensure that participants have access to sufficient power during emergencies. *See* Ex. 1-145 (Western Pool Reserve Sharing Program). The Western Power Pool also organizes more rapid-response grid stability coordination, including a frequency response sharing group in which participating entities work together to secure adequate ancillary services to maintain minute-to-minute grid stability. Ex. 1-146 (Western Frequency Response Sharing Group).

Of particular note to the question of resource adequacy oversight, in February 2023 the Western Power Pool secured approval from FERC to create a more comprehensive resource adequacy coordination regime, the Western Resource Adequacy Program. *Northwest Power Pool*, 182 FERC ¶ 61063 (2023). The Western Resource Adequacy Program was designed initially as a voluntary resource adequacy planning and compliance program for utilities in the West and is intended to supplement the resource planning and projections undertaken by utilities, states, and provinces. *Id.* at ¶ 5. As FERC identified in its order approving the Western Resource Adequacy Program, the operational program serves as “a resource of last resort—not

a resource of first resort”—and participants are maintaining their own processes to plan ahead and ensure their own resource adequacy. *Id.* at ¶ 98. This makes the coordination offered by the Western Resource Adequacy Program entirely additional and complementary to the other planning processes discussed in this section. *Id.* at ¶ 5.

The Western Resource Adequacy Program has two distinct operational components: a forward-showing process and operational follow-through. Under the forward-showing component, participants in the program demonstrate seven months in advance of each summer season and each winter season that they have secured their proportional share of regional capacity, which includes a required planning reserve margin that is designed to meet a loss-of-load expectation (“LOLE”) standard of 1-event-in-10-years. *Id.* at ¶¶ 6, 53. To avoid a charge, participants must also show that they have reserved at least 75% of the transmission necessary to deliver energy at the time of their forward-showing filings, and all of the necessary transmission during the activation period of the operating program. Ex. 1-147 at § 13.2 (WRAP Tariff). This transmission reservation must be at the highest level of reliability (NERC Priority 6 or Priority 7 firm point-to-point or network integration transmission service). *Northwest Power Pool*, 182 FERC ¶ 61063, at ¶¶ 54, 78.

Each participant’s forward projection is then tested against a nearer-term forecast (week ahead or day ahead) in the operational phase of the Western Resource Adequacy Program process. Based on the results of the comparison, participants with surpluses may be required to hold back capacity for the benefit of other participants with a deficit, with fines levied for nonperformance of this obligation to hold back. *Id.* at ¶¶ 7, 94–95. In this way, the Western Resource Adequacy Program ensures that each balancing authority in the region is able to rely on imports from neighbors, thereby approximating one of the key benefits load-serving entities gain via participation in RTOs in other parts of the country. *See generally* 89 FERC ¶ 61,285.

As of October 13, 2025, 16 utilities committed to the Program’s initial binding operational season, in Winter 2027/28. Ex. 1-148 (WRAP Notice). Even in its voluntary form, the Western Resource Adequacy Program has added to the tapestry of regional cooperation that has helped ensure the Pacific Northwest continues to receive power reliably.

iv. WECC Assesses Resource Adequacy in the Region on an Annual Basis and Enforces Federal Standards.

WECC is the largest of the six Regional Entities that make up NERC’s Electric Reliability Organization Enterprise. Ex. 1-149 at 1–2 (“About WECC” Webpage). Its service territory encompasses two Canadian provinces (Alberta and British Columbia), the northern portion of Baja California, Mexico, and all or parts of 14 Western states (including Washington, Oregon, Idaho, Montana, and California). *Id.*

Under its NERC-delegated authority, WECC is responsible for setting regional reliability standards, monitoring compliance with those standards, enforcing standards, and overseeing reliability assessment and performance analysis within WECC's footprint. *Id.*; Ex. 1-150 at § 401 (NERC Rules of Procedure); *see N. Am. Elec. Reliab. Corp.*, 153 FERC ¶ 61,134, at PP 55–56 (2015). This work includes ensuring that regional contingency reserve standards are aligned with national standards and performing risk assessments of bulk power system users, owners, and operators on the reliability of the Western Interconnection. Ex. 1-151 at 13–14 (WECC Contingency Reserve Whitepaper) (finding that by reducing minimum contingency reserve amounts, prior sequestered resources will be made available to match the less predictable response of variable generation resources and more development of variable generation sources may be encouraged); Ex. 1-152 (WECC Risk Factor Criteria).

WECC also performs a yearly assessment of resource adequacy in its footprint, which is a useful resource for system planners. *E.g.*, WECC, *Western Assessment of Resource Adequacy: 2024* (last visited Jan. 28, 2026), <https://feature.wecc.org/wara/>; Ex. 1-09 (2024 Western Assessment of Resource Adequacy). The yearly resource adequacy assessment performed by WECC is “an energy-based probabilistic” assessment, which evaluates resource adequacy under a variety of conditions. *Id.* It divides WECC's larger footprint into smaller subregions and provides detailed analysis of regional demand forecasts and planned resource additions for the next 10 years. *Id.* The scenarios modeled in the assessment include increased demand and slower buildout of generating resources. *Id.* These analyses provide information that helps inform NERC's reliability assessments of the entire country's energy system. Ex. 1-153 at 1 (WECC Reliability Assessment Webpage). Additionally, WECC contributes to NERC's assessments. *See* Ex. 1-08 at 4 (NERC 2025-26 Winter Assessment).

v. Washington Protects Resource Adequacy Through Integrated Resource Planning and Annual Reviews.

Since 2006, the Washington Department of Commerce has reviewed the integrated resource plans of both consumer- and investor-owned utilities in the state, as well as other state, regional, and national sources, and prepared a biennial report to the legislature on resource adequacy in the region. WASH. REV. CODE § 19.280.060; *see, e.g.*, Ex. 1-154 (Wash. Commerce Util. Res. Planning Report (compiled 2022 & 2024)). Through legislative developments like the Clean Energy Transformation Act (CETA), WASH. REV. CODE § 19.405, the legislature recognized the need for regulatory bodies in the state to work more closely together to ensure that there was sufficient resource adequacy to serve a growing electric demand. To that end, the legislature required the Washington Department of Commerce and the Washington Utilities and Transportation Commission (together, the “Washington Agencies”) to

jointly convene a meeting of representatives of the investor-owned utilities and consumer-owned utilities, regional planning organizations, transmission operators, energy analytics experts at Pacific Northwest national laboratory, and other stakeholders to discuss the current, short-term, and long-term adequacy of energy resources to serve the state's electric needs, and address specific steps the utilities can take to coordinate planning in light of the significant changes to the Northwest's power system including, but not limited to, technological developments, retirements of legacy baseload power generation resources, and changes in laws and regulations affecting power supply options.

Id. § 19.280.065(1). The statute was updated in 2023 to explicitly “focus discussion on the extent to which proposed laws and regulations may require new state policy for resource adequacy.” *Id.* § 19.280.065(2).

In 2025, the Washington Agencies hosted three separate meetings focusing on resource adequacy in Washington state: a June 5th meeting focused on summer readiness, a September 22nd meeting focused on long-term resource adequacy, and a November 4th meeting focused on winter readiness. See Ex. 1-155 (Washington Agencies Resource Adequacy Meeting Summaries (Compiled)). These meetings involved detailed reports from a mix of utilities, regional planning organizations, transmission operators, and regional energy experts. *Id.*

Additionally, electric utilities serving customers within Washington State are required to develop their own Integrated Resource Plans to plan for how the individual utility will meet future customer energy needs in both a cost-effective and reliable manner. WASH. ADMIN. CODE § 480-100-620. These plans must be updated every two years. *Id.* § 480-100-625. IRPs include resource adequacy analysis to ensure that, looking forward, the utility will be able to consistently meet varying load demands. *Id.* § 480-100-620(8). IRPs also provide a utility the opportunity to “show its work” regarding the conclusions the utility makes around resource acquisition needs. *Id.* § 480-100-620(11). IRPs are reviewed by the Washington Utilities and Transportation Commission and are subject to public comment. *Id.* § 480-100-620(17) (requiring utilities to summarize and respond to public comments received on draft IRPs); *id.* § 480-100-625 (requiring utilities to file work plans, draft IRPs, and progress reports to the Washington Utilities and Transportation Commission); *id.* § 480-100-630 (requiring utilities to demonstrate how advisory group input informed the final IRP). The Washington Department of Commerce summarizes the utilities' IRPs and reports to the state legislature. *E.g.*, Ex. 1-156 at 4 (Wash. Dep't of Commerce Summary of Utilities' 2024 IRPs (Dec. 1, 2025)).

Beyond IRPs, utilities must also develop Clean Energy Action Plans and Clean Energy Implementation Plans to identify how the utility will meet the statutory requirements of the Clean Energy Transformation Act. WASH. REV. CODE

§ 19.280.030 (Clean Energy Action Plans); *id.* § 19.405.060(1)-(2) (Clean Energy Implementation Plans). Clean Energy Action Plans are 10-year plans for how a utility will meet resource emission standards under CETA, while still accounting for resource adequacy. *Id.* § 19.280.030(1)(l), (2). Within the Clean Energy Action Plan, a utility must establish a resource adequacy requirement that will guide its resource planning and compliance. *Id.* § 19.280.030(2)(b). Clean Energy Implementation Plans are focused on shorter-term planning, where a utility sets forth specific actions it will meet in the next four years to ensure that it is on track to meet the statutory requirements of CETA. *Id.* § 19.405.060. This includes analysis of resource adequacy. *Id.* § 19.405.060(2)(a)(iv).

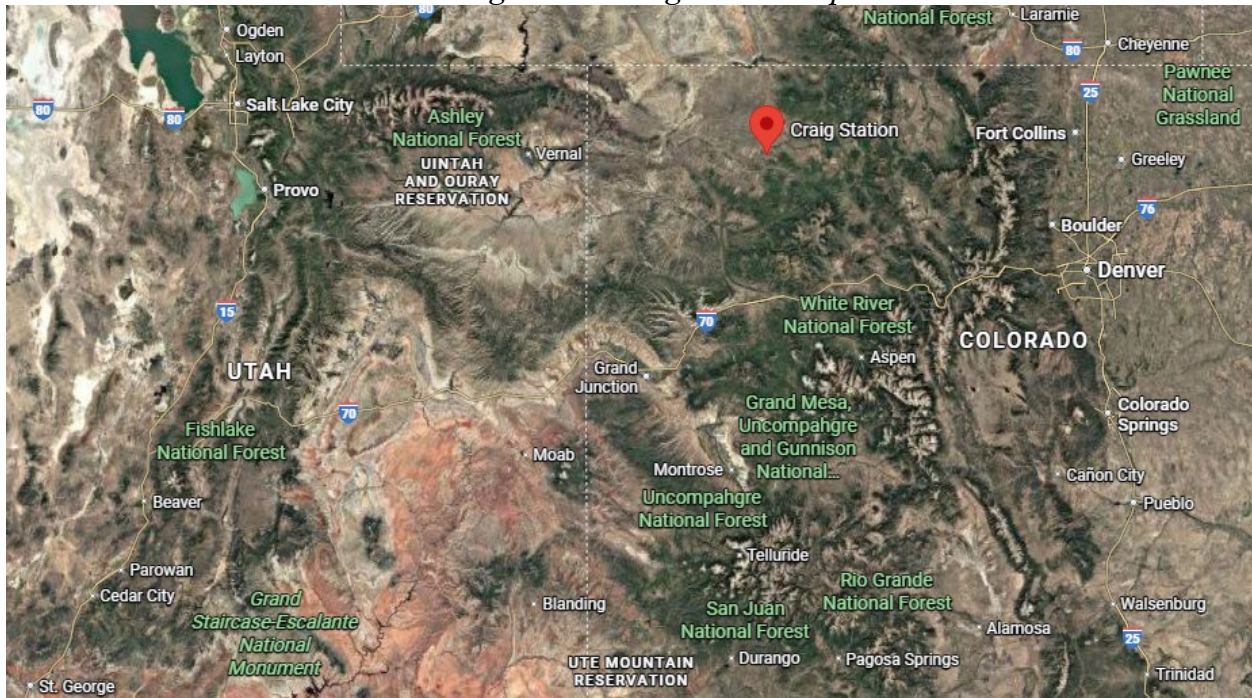
Utilities in the region also commissioned a consultancy, Energy and Environmental Economics (“E3”), to study resource adequacy in the Pacific Northwest. *See* Ex. 1-157 at 2 (E3 Resource Adequacy Phase 1 Presentation). E3 presented to the Washington Agencies at the agencies’ Fall 2025 Resource Adequacy meeting focused on long-term resource adequacy in Washington State. *See id.* at 1. The E3 presentation has been independently evaluated, *see* Ex. 1-158 at *passim* (Sylvan & GridLab Independent Evaluation of E3 Presentation), and must be understood in the context of information from the principal author of the presentation, *see* Ex. 1-159 at *passim* (Email Correspondence with E3); Ex. 1-159a (E3’s Attachment to Email Correspondence with E3); Ex. 1-159b (E3’s Attachment to Email Correspondence with E3 (as transmitted in Excel form)).

B. Craig’s Retirement Was Planned for a Decade by Utilities and State Regulators.

1. Craig Is a Power Plant in Colorado Originally Built in 1980.

Craig began operations in 1980. The generator is located in Craig, Colorado, approximately 200 miles northwest of Denver and 45 miles west of Steamboat Springs. Craig’s location is shown in Figure 7 below.

Figure 7: Craig Plant Map



Source: Google Earth.

Craig Unit 1 is part of a three-unit coal-fired generating facility (collectively, and with associated facilities, the “Craig Plant”). The Craig Plant’s three units all rely on burning coal to generate electricity. Tri-State has committed to retiring Craig Unit 2 by September 30, 2028, and Craig Unit 3 by January 1, 2028. Ex. 1-89 at 5 (Tri-State 2025 ERP Annual Progress Report).

Figure 8: Craig Plant Photograph



Source: Ex. 1-53 (Colorado Sun Article).

2. *Tri-State Operates and Partially Owns Craig.*

Tri-State serves as the operator of Craig. As the operating agent, Tri-State is responsible for the daily management, administration, and maintenance of the facility. Ex. 1-49 at 6 (Tri-State Revised ERP Assessment of Existing Resources).

Tri-State is also a partial owner of Craig, holding a 24% interest. Ex. 1-03 at 3 (Powers Decl.). The other Craig Co-Owners, along with their respective shares, are as follows: PacifiCorp owns 19.28%; Platte River owns 18%; Xcel owns 9.72%; and Salt River Project owns 29%. *Id.* at 3–4 (citing utility filings).

3. *Craig Is Old, Unreliable, Inflexible, Dirty, and Expensive.*

i. Craig Is Old and Unreliable.

Craig is *past* the typical operational life of coal units. Ex. 1-03 at 5 (Powers Decl.) (citing Ex. 1-48 at 18 (IEA Report); Ex. 1-47 at 127 (Palgrave Handbook)). Its production and reliability have declined with age.

Data from the U.S. Environmental Protection Agency’s (“EPA”) Air Markets database indicates that Craig’s gross output declined by 27% from 2022 through 2024, the most recent year for which annual data is available. The values are shown in Figure 9 below.

Figure 9: Craig Output from 2022 through 2024

Year	Production (MWh)
2022	2,797,335
2023	2,015,029
2024	1,824,100

Ex. 1-113 (Craig Station, AMD data 2020 through 2024) (EPA Air Markets Database).
MWh values rounded to nearest integer.

In recent years, Craig has experienced a sharp increase in outages, which reflect aged, worn components that are expensive and may be difficult to repair or replace. Ex. 1-03 at 5, 7–8, 14–15 (Powers Decl.). The outages at Craig demonstrate an increasing inability to perform consistently, even under normal conditions. In fact, when the Department issued the Order, Craig had a forced outage that began on December 19, 2025. Ex. 1-06 (Tri-State December 2025 Press Release) (explaining that the forced outage was a result of “a mechanical failure of a valve, and Tri-State and the other co-owners will need to take the necessary steps to repair the valve in a timely manner”). The December 2025 forced outage is characteristic of an old plant that is prone to mechanical failures. Ex. 1-03 at 7 (Powers Decl.).

Craig’s December 2025 forced outage is consistent with recent trends. Outside of scheduled maintenance periods, Craig has been unable to produce power during

significant portions of recent years (known as the unit’s “forced outage rate”). Ex. 1-03 at 7–8 (Powers Decl.) (citing Tri-State’s filings with the Colorado Commission). For example, Craig experienced a sharp year-over-year forced outage rate increase between 2022 and 2023, increasing from 1.75 percent to 9.53 percent. *Id.* Craig’s 9.53 percent forced outage rate translates into 835 hours that Craig could not operate in 2023, or approximately five weeks of forced unavailability. *Id.* Because of Craig’s inconsistent and sharply increasing forced outage rate, it cannot meet the demands of an emergency.

Craig’s recent forced outages are a direct result of significantly decreased capital expenditures and maintenance at Craig. *Id.* at 6–7. This is unsurprising, as the Craig Co-Owners announced the plant’s retirement date in 2016. Because the co-owners anticipated that the plant would retire at the end of 2025, they did not undertake maintenance projects that they would have undertaken had they been expecting to operate the unit past 2025. *Id.* at 7. In fact, in response to the Order, Tri-State conceded that the “retirement decision has informed operational and maintenance decisions.” Ex. 1-06 (Tri-State December 2025 Press Release). As evidenced by Craig’s December 2025 outage, the plant requires additional investments in operations and maintenance because the Craig Co-Owners have been foregoing maintenance in recent years. *Id.*; Ex. 1-03 at 7 (Powers Decl.). Foregone maintenance makes Craig more prone to failure and more likely to need to go on outage to fix broken parts or maintain the unit. Ex. 1-04 at 4 (Grid Strategies Cost Report); *see also* Ex. 1-06 (Tri-State December 2025 Press Release).

Tri-State transitioned from a preventative approach to a “fix it if it breaks” approach at Craig. Ex. 1-03 at 6–7 (Powers Decl.). Tri-State utilizes a consistent approach with its investment strategy for early retirement of coal units. Tri-State stated that it “proactively works to reduce and eliminate capital expenses related to early retirement of resources as can be seen by the historical capital expense.” Ex. 1-51 at 187 (Tri-State 2020 ERP). Tri-State’s filings with the Colorado Commission further memorialize this “fix it if it breaks” approach for Craig. Tri-State represented that its “investments in [the Craig Plant] are being appropriately limited to only actions necessary for ensuring safe operations and regulatory compliance, given the impending retirement of these units.” Ex. 1-50 at 10 (Insgold 2023 ERP Direct Testimony). As a result, “it is unlikely that Craig 1 can be depended upon to operate reliably.” Ex. 1-03 at 5 (Powers Decl.).

ii. Craig Is Inflexible.

On top of Craig’s reliability problems, the plant cannot respond to extreme peak demand on short notice. Ex. 1-03 at 8–9 (Powers Decl.). Coal units—including Craig—take a minimum of 12 hours to reach full load operation from a cold start. *Id.*; *see* Ex. 1-44 at PDF 3 (RMI Analysis of Coal Plants’ Threats to Reliability); Ex. 1-33 at PDF 3 (IEA Flexibility Report). Even if Craig could provide power reliably—and it cannot—the unit’s long start time means that the plant is ill-suited to provide

peaking power during periods of high demand. Ex. 1-03 at 8–9 (Powers Decl.). In other words, Craig is inflexible, and it is unsuitable for providing power during precisely the kind of periods the plant is supposed to be operating pursuant to the Order.

iii. Craig Is Dirty and Environmentally Harmful.

Additionally, Craig has been a significant source of pollution. If Craig continues operation in 2026 as it did in 2025, the unit will emit over one billion pounds of carbon dioxide (“CO₂”) over one million pounds of nitrogen oxides (“NO_x”), and hundreds of thousands of pounds of sulfur dioxide (“SO₂”) in just three months. Figure 10 below shows a projection of Craig’s emissions during the first 90 days of 2026, if Craig were to generate at the same rate it did in 2025.

Figure 10: Projected 90-Day CO₂, SO₂, and NO_x Emissions of Craig

Month	Production (MWh)	CO ₂ (lbs)	SO ₂ (lbs)	NO _x (lbs)
Jan. 2026	174,089	438,258,940	102,016	479,093
Feb. 2026	124,764	306,919,440	73,112	343,351
Mar. 2026	161,356	396,935,760	94,555	444,052
Total:	460,209	1,142,114,140	269,683	1,266,496

Source: Ex. 1-03 at 12 (Powers Decl.).

Craig’s air pollution results in several harms. NO_x and SO₂ both cause health concerns, including respiratory problems. Ex. 1-03 at 10 (Powers Decl.). And CO₂ is the primary cause of global warming. *Id.* at 11. Pollution from coal generation can have drastic and deadly health effects. *See, e.g.*, Ex. 1-121 at 2 (Mercury Mortality Risks of Coal); Ex. 1-123 at PDF 4–5 (EPA COBRA Health Effects Estimate). On an annual basis, air pollution from Craig causes an estimated 4 premature deaths, and this pollution increases the likelihood of emergency room visits, heart attacks, and asthma attacks. *Id.*; Ex. 1-160 at PDF 2–3 (Clean Air Task Force Toll from Coal). In total, the health harms from Craig’s air pollution result in over \$56 million in estimated costs each year. Ex. 1-123 at PDF 5 (EPA COBRA Health Effects Estimate).

Air pollution from the plant also clouds Colorado’s treasured federal public lands in haze. Craig’s operation impairs visibility in several national parks and wilderness areas in Colorado, including (among others) Rocky Mountain National Park, Flat Tops Wilderness Area, Eagles Nest Wilderness Area, Mount Zirkel Wilderness Area, and Rawah Wilderness Area. Ex. 1-03 at 11 (Powers Decl.) (citing Ex. 1-71 at 47–48 (BART CALPUFF)). Therefore, alongside the health burdens of the pollution, the continued operation of Craig will harm the people who visit and recreate at these iconic landscapes.

In addition to air pollution, continued operation of Craig will worsen water scarcity in the state and the region. Craig consumes approximately 250,000 gallons of water per hour of operation at its net capacity of 427 MW. *Id.* at 16 (citing Ex. 1-

88 at 19 (Tri-State 2023 ERP Modeling Assumptions)). All the while, Colorado, the river basin that shares its name, and the surrounding states are in a water crisis. *See* Ex. 1-52 at 3 (Colorado 2023 Water Plan). Water conservation remains a key priority for Colorado, especially as the region experiences population growth, long-term warming trends, major wildfires, aridification, and multi-year drought. *Id.* (Colorado 2023 Water Plan). The energy sector drives water overuse in the state, and coal-fired power plants are water consumptive compared to renewable sources of energy. *Id.* at 21.

Retiring Craig would eliminate the plant’s environmental harms. Meanwhile, the ongoing operation of Craig will guarantee that the plant’s harmful air pollution and wasteful water practices persist.

iv. Craig Is Expensive.

Craig is also an expensive plant to run. In 2024, Craig cost over \$80 million to operate. Ex. 1-04 at 3 (Grid Strategies Cost Report). Over the period 2022 to 2024, operating Craig cost nearly \$85 million per year. *Id.* Operating Craig at its average output from 2022 through 2024 will cost more than \$20 million for each 90-day period.

Craig is an uneconomic source of electricity. The available data demonstrates that Craig’s “cost of producing electricity is almost always higher than the value of that electricity.” *Id.* at 6. Craig’s fuel costs exceed the average market price, and considering variable costs makes Craig even more uneconomic. *Id.* at 3–4. All told, market prices do not cover Craig’s variable costs in over ninety percent of hours. *Id.* at 6. In other words, the cost of producing electricity at Craig is overwhelmingly higher than the value of that electricity.

Further, Craig’s foregone maintenance will exacerbate the plant’s already high operating costs. As coal plants age, they require sustaining capital expenditures and increasing O&M costs over time. When coal plants reach an age of 40–50 years, they require a significant increase in capital expenditure. *Id.* at 4 (citing Ex. 1-162 at 29, 62 (EIA Generating Unit Annual Capital and Life Extension Costs Analysis)). Recent forced shutdowns—including the shutdown that began in December 2025—demonstrate the need for maintenance costs at Craig. Ex. 1-06 (Tri-State December 2025 Press Release).

“All costs” incurred by the Craig Co-Owners to comply with the Order “end up on ratepayers.” Ex. 1-163 at 1–2 (Trump Advisor Says Electricity Customers Pay for 202(c) Orders). Tri-State avers that “the order will likely require additional investments in operations, repairs, maintenance and, potentially, fuel supply, all factors increasing costs,” and that the utility “is working to prepare filings in support of cost recovery.” Ex. 1-166 at 1 (Tri-State January 2026 Press Release).

These harms can be avoided by retiring Craig. As further discussed below, the Craig Co-Owners—Tri-State, the Salt River Project, the Platte River, PacifiCorp, and Xcel—wanted to retire the plant on December 31, 2025. Further, the state and federal regulators—including the Colorado Commission, the Colorado Department of Public Health and Environment, and the U.S. EPA— each approved the retirement. *See, e.g.*, Ex. 1-85 (Colorado Commission Decision in 20A-0528E) (approving resource plan where Craig ceases to generate electricity after 2025); Ex. 1-90 at 40 (Colorado Commission Decision No. C25-0612) (same); Ex. 1-65 (CDPHE Regulation No. 3); 83 Fed. Reg. 31332.

V. REQUEST FOR REHEARING

The Order is 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 Order, (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. Auto. 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 the 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, which operate independently and through an interstate compact known as the Northwest Power and Conservation Council; to FERC; and to NERC. *See, e.g.*, 16 U.S.C. §§ 824(a)–(b), 824o; *Pac. Gas & Elec. Co. v. State Energy Res. Conserv. & Dev.*

Comm’n, 461 U. S. 190, 205 (1983). Both the agency’s new policy and the Order exceed the Department’s authority and are therefore contrary to law.

Before tackling the Order’s legal faults and issues, *see infra* secs. V.A through V.D, it is useful to understand the broader context of the Department’s policy. The Department acknowledges that its Order is 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. Order at 2. The Order relies upon the Energy Emergency Executive Order, 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. Order at 2 (relying on Ex. 1-36 (Energy Emergency EO)).

The Order also relies on another executive order, the Grid EO. *Id.* (relying on Ex. 1-37 (Grid EO)). 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. 1-38 (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. 1-37, 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 coal plant. *See* Order No. 202-25-3 at *passim*. 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 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 instant Craig order, 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 Indiana, Order Nos. 202-25-12 & 202-25-13.

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. 1-35 at vi (July Resource Adequacy Report); *see also* Ex. 1-39 at 3–4 (DOE July 7 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.

Taken together, the Energy Emergency EO, Grid EO, July 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. 1-118 (Department Press Release on Centralia Order); *see also* Ex. 1-34 (Secretary Wright’s West Virginia Remarks) (reporting Secretary Wright’s stated intention to stop the closure of coal plants and claimed authority to do so).

The Department has further reinforced this policy by applying it to Craig.

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

The Order claims an emergency exists within the WECC Northwest assessment area. Order at 1. The Order explains that “the WECC Northwest assessment area . . . includes Colorado, Idaho, Montana, Oregon, Utah, Washington, and Wyoming.” *Id.* According to the Order, “the emergency conditions . . . will continue in the near term and are also likely to continue in subsequent years. *Id.* at 3. The Order then identifies the supposed emergency: “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.” *Id.*

As discussed below, the Order’s determination of an emergency in the WECC Northwest assessment area (*i.e.*, in Colorado, Idaho, Montana, Oregon, Utah,

Washington, and Wyoming) exceeds statutory authority and is both unreasoned and without substantial evidence.⁴

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

The Order invokes 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.

⁴ To the extent the Department claims an emergency in some region distinct from the WECC Northwest assessment area defined in the Order, the Department’s emergency declaration still exceeds statutory authority and is both unreasoned and without substantial evidence, including (but not limited to) because the Order describes no such region, presents no reasoning associated with any such region, offers no credible evidence demonstrating an emergency in such region, and fails to examine the evidence detracting from an emergency determination in such region. Moreover, the Order is unreasoned and not based on substantial evidence in imposing requirements to best meet such an emergency and serve the public interest.

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 emphasizing that its emphasis on 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. 1-35 at 1 (July 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 (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.* Order at 3 (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 *potential* 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* Order at 1–3, 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. 1-119 at page 7-6 (2001 National Energy Policy) (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); *see 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 and 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 thus uniformly supports 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) prior to 2025 further corroborates the urgency of the emergency conditions that are the necessary predicate for any Department intervention under that 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 prior to 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. 1-13 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. 1-16 at 1–2 (DOE Order No. 202-20-2) (responding to shortages produced by ongoing extreme heat and wildfires); Ex. 1-20 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).⁵ 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 and Coal Plant Retirements, Neither of Which Is an Emergency Under Section 202(c), and Separately the Claimed Long-Term Emergency is Unreasoned and Not Based on Substantial Evidence.

The Department’s determination that an emergency exists rests on its assertion that “increasing demand and shortage from accelerated retirement of generation facilities . . . could lead to the loss of power to homes, and businesses.” Order at 3. This determination focuses on long-term concerns, noting that such conditions are “likely to continue in subsequent years” in concluding that an emergency designation is appropriate. *Id.* Those concerns—even if fully substantiated—would not be a basis

⁵ The Department has also narrowly tailored the remedies in Section 202(c) orders before 2025 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. 1-13 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. 1-16 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).

to mandate Craig’s continued operation. And they are not substantiated. Utilities and regulators 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, as Well as Its Concerns About Coal Plant Retirements, Are Not an “Emergency” Within the Meaning of 202(c).*

As an initial matter, even if the Order’s claimed emergency conditions were established (they are not), reliability concerns arising beyond “the near term . . . in subsequent years,” Order at 3, 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) (emphasis added).

At most, the Order describes long-term trends that may affect the reliability of the bulk power system in the future if left unaddressed. The Order’s 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* Order at 1–3.

While many of the Order’s 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 Order. The emergency provision in Section 202(c), along with the Department’s claimed power to seize command-and-control authority over generating resources like Craig, 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. 1-120 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 Order purports 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. § 824a(c), preventing any interpretation of its terms that might encompass a potential longer term resource adequacy emergency in “subsequent years.” Order at 3. The expansive interpretation of Section 202(c) implicit in the Order, stretching the meaning of “emergency” to cover resource planning concerns over “years” subsequent to 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 Comm’n*, 401 F.2d 930, 938 & 938 n.51 (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. 1-120 at 5 n.4 (Department Export Authorization EA-365-C (Oct. 21, 2025)).

Through the Order, the Department expressly seeks to override the decisions of utilities and their regulators pursuant to the procedures established by Congress to ensure abundant electricity supplies and the reliability of the bulk-electric system. 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 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). The retirements of generators burning coal and other fossil fuels to which the Order devotes significant attention do not constitute an emergency under Section 202(c). *See, e.g., 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.”).

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 Order's discussion of long-term concerns is unreasoned and without substantial evidence, including because the Order both overestimates the potential of a shortfall and underestimates the ability of existing processes to address any projected shortfall. The Order discusses five sources touching on long-term issues: (1) the 2024 Long-Term Reliability Assessment; (2) the 2024 Western Assessment of Resource Adequacy; (3) data from the Energy Information Administration; (4) executive orders; and (5) DOE's July Resource Adequacy Report. None of these sources presents evidence of circumstances anywhere near an emergency in the region. And many other sources the Department knows or should know, yet fails to consider, further undermine the Department's claim.

The Order's first basis for finding a long-term emergency is the 2024 Long-Term Reliability Assessment. Order at 1–2. The Order cites passages from the assessment regarding “energy variability” due to the “large share of wind and hydro in the portfolio”; 5 GW of expected “baseload resource retirements” between 2024 and 2028 and the plan to replace them with solar, wind, and battery resources; and potential supply chain issues affecting battery resources. Order at 1–2 (discussing Ex. 1-07 at 129–30 (NERC 2024 Long-Term Reliability Assessment)).

The Order's reliance on the 2024 Long-Term Reliability Assessment is unreasoned. The Order cites statements that do state or even support the existence of an emergency under Section 202(c) while ignoring the remainder of the document, which undercuts the Department's claimed emergency.

The 2024 Long-Term Reliability Assessment examines a region it refers to as “WECC-NW,” which encompasses and extends beyond the seven-state WECC Northwest assessment area. *See* Ex. 1-07 at 127 (NERC 2024 Long-Term Reliability Assessment) (“WECC-NW (Northwest) is a summer-peaking assessment area in the WECC Regional Entity. The area includes Colorado, Idaho, Montana, Oregon, Utah, Washington, and Wyoming and parts of California, Nebraska, Nevada, and South Dakota.”). The 2024 Long-Term Reliability Assessment finds that the WECC-NW region has normal risk, as shown in Figure 11 below.

High Risk: shortfalls may occur at normal peak conditions
 Elevated Risk: shortfalls may occur in extreme conditions
 Normal Risk: low likelihood of electricity supply shortfall

Source: Ex. 1-07 at 6 (NERC 2024 Long-Term Reliability Assessment).

The 2024 Long-Term Reliability Assessment does not state that there is an energy or capacity shortfall between now and 2028; in fact, for 2028, the 2024 Long-Term Reliability Assessment finds no reliability metrics violations in the WECC-NW region. Ex. 1-01 at 14 (Current Energy Group Report). The assessment does identify that in 2031, five years from now, the region’s anticipated planning reserve margin might fall below the reference level, but only by excluding from its calculations certain planned resources, known as “Tier 2 resources,” that have made tangible progress in development and meet certain criteria. *Id.* When Tier 2 resources are included, the 2024 Long-Term Reliability Assessment finds that the reserve margin in the WECC-NW region remains above reference levels throughout the planning period (i.e., through 2034). *See id.* at 14–15; *see also* Ex. 1-02 at 7–8 (Grid Strategies Resource Adequacy Report). The 2024 Long-Term Reliability Assessment reaches this finding even while projecting demand growth of 18.7% in the WECC-NW region, more than double the 8.5% demand growth referenced in the Order. *See* Ex. 1-01 at 15 (Current Energy Group Report); Order at 2.

Thus, even with the planned retirements of multiple coal and natural gas units in the region and the potential for increased demand, the WECC Northwest assessment area is within a region that the 2024 Long-Term Reliability Assessment assesses as “begin[ning] from a position of strong resource adequacy” and “finds no evidence of medium-term resource adequacy crisis.” Ex. 1-01 at 15 (Current Energy Group Report).

The Order’s second basis for finding a long-term emergency is the 2024 Western Assessment of Resource Adequacy. The Order references isolated statements from this document: a forecast of peak demand growth in “WECC’s Northwest-Central

subregion”; the fact that “most planned retirements are ‘baseload generation, such as coal, natural gas, and nuclear’”; and the proposition that “571.3 MW of coal-fired generating capacity across six units at three locations have retired in Colorado.” Order at 2.

To begin with, the “NW-Central” subregion examined in the 2024 Western Assessment of Resource Adequacy is another geographic mismatch to the footprint of the Order’s claimed emergency. That NW-Central subregion reaches Nevada, while the Order’s seven-state emergency does not. *Compare* Ex. 1-09 at 3 (2024 Western Assessment of Resource Adequacy) (showing map), *with* Order at 1 (identifying the seven-state footprint of the claimed emergency). The geographic borders of WECC’s NW-Central subregion are shown in Figure 12 below.

Figure 12: 2024 Western Assessment of Resource Adequacy Subregions



Source: Ex. 1-09 at 3 (2024 Western Assessment of Resource Adequacy).

The Order’s reliance on a mismatched geographic footprint—*e.g.*, its reliance on conditions outside of the areas in which the claimed emergency exists—is unreasoned and not based on substantial evidence.

The Order is also unreasoned and not based on substantial evidence in failing to consider the 2024 Western Assessment of Resource Adequacy. The document serves to inform planning and does not identify an existing crisis or call for extraordinary measures outside of the normal planning process. Ex. 1-01 at 11–12 & app’x A at 25–27 (Current Energy Group Report). Moreover, “[t]he study does not identify retirements as a primary cause of future reliability risks,” including retirements of coal-burning generators like Craig. *See id.* at 12. Rather, according to the 2024 Western Assessment of Resource Adequacy, “the timely completion of new generation is the key medium-term requirement for maintaining resource adequacy.” *Id.* And in fact, the 2024 Western Assessment of Resource Adequacy shows the active planning and resource deployment in the region:

The 2024 Western Assessment of Resource Adequacy demonstrates that the region has been actively planning for plant retirements and load growth through increased planned resource additions, including new capacity (~15 GW of new batteries and ~3 GW of new natural gas by 2027), and by moderating previously-assumed retirements downward from 2022. Generation additions across the WECC subregions appear to be on track with the 2024 assessment's expectations. In 2025, approximately 9.4 GW of new batteries, 6 GW of solar, 1.7 GW of gas, and 2 GW of wind were deployed across the interconnection. Of this 19 GW, more than 4.7 GW has been deployed in Colorado, Nevada, Utah, Idaho, Washington, Oregon, Montana, and Wyoming as of the November report [from the Department's Energy Information Administration], and 2.1 GW in the same states is expected to be completed in December.

Id. (footnotes omitted).

In addition, the few specifics from the 2024 Western Assessment of Resource Adequacy discussed in the Order do not support the claimed emergency. Both as an evidentiary and as a logical matter, the Order's references to forecasted demand and forecasted retirements cannot together or by themselves demonstrate the existence of a shortfall in electricity or in electricity generation, including because those two data points are insufficient to assess whether the overall level of expected supply is sufficient to meet expected demand. The Order fails to address, for instance, that planned generator additions exceed planned retirements. *See id.* at 17–18; Ex. 1-02 at 8–9 (Grid Strategies Resource Adequacy Report). Moreover, utilities have already accounted for demand growth in their electric resource plans, and have determined that they will not have a shortfall even after Craig's retirement. *See* Ex. 1-02 at 9 (Grid Strategies Resource Adequacy Report).

The Order's third basis for finding a long-term emergency is data from the Department's Energy Information Administration. The Department here focuses its attention on retirements of generators burning coal and other fossil fuels in Colorado and the amount of wind-powered generation in the state. Order at 2.

The mix of generating resources in a state is not, standing alone, evidence of an emergency either within that single state or in the seven states on which the Order focuses. Merely tallying retirements of certain generator types, and calculating the amount of wind, does not indicate whether a particular state or states have a shortfall of energy or capacity. On this ground alone, the Order's reliance on the data from the Energy Information Administration is unreasoned and insubstantial.

The Order's reliance on the data from the Energy Information Administration is further problematic due to basic mathematical errors. The Order overstates the amount of planned coal retirements shown in the data for Colorado by more than

900 MW. Ex. 1-01 at 17–18 (Current Energy Group Report). The error is shown in Figure 13 below.

Figure 13: Discrepancies Between Order and EIA Data

	Order 202-25-14	EIA 860 M Data*	Discrepancy
Historical (2019-2024) Coal Retirements	571.3 MW	571.3 MW	None
Planned Coal Retirements by 2029	~3,700 MW ⁷⁴	2,789.6MW	~910 MW
Planned Natural Gas Retirements by 2029	656.8 MW	675.6 MW	18.8 MW

*As of November 2025 (released December 2025)

Source: Ex. 1-01 at 18 (Current Energy Group Report).

The Order also presents an incomplete picture in its reliance on the Energy Information Administration data. The Order “cites EIA data to identify planned generation retirements but does not acknowledge that the same EIA data also show substantial new generation additions in Colorado.” *Id.* at 18. According to that data, the historical and planned additions of new generating resources far exceed the retirements in Colorado, *see id.*, as shown in Figure 14 below. The Order is unreasoned and not based on substantial evidence because a complete picture of both retirements and additions in Colorado shows that there will be a net increase in generating capacity of more than 6,000 MW through 2029.

Figure 14: Retirements and Deployments in Colorado

	Retirements (MW)	Deployments (MW)
Historical (2019-2024) Retirements	845.9	4,827.6
Planned Retirements by end of 2029	3,455	5,793.5
Total (2019-2029)	4,300.9	10,621.1

Source: Ex. 1-01 at 18 (Current Energy Group Report).

The Department fails to explain how this substantial net increase in generating capacity will not be sufficient to address the claimed future shortfall.

The Order’s fourth basis for finding a long-term emergency are executive orders. The Order cites 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. Order at 2. In the quoted passages from the Energy Emergency EO, the President offers his perspective on issues relating to the nexus between energy usage and “our Nation’s economy, national security, and foreign policy.” Ex. 1-36 at 90 Fed. Reg. at 8433–34 (Energy Emergency EO). In the Grid EO, the President adds his view on the nature and drivers of electricity demand in the country. Ex. 1-37 at 90 Fed. Reg. at 15521 (Grid EO).

Neither executive order supplies valid evidence of an actual energy emergency under Section 202(c) (this winter or any time). 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. Yet the executive orders cited in the Order provide no factual evidence applicable to the WECC Northwest assessment area for this winter or beyond. *See* Ex. 1-36 at *passim* (Energy Emergency EO); Ex. 1-37 at *passim* (Grid EO). The executive orders thus do not constitute useful evidence, much less substantial evidence. *See, e.g., Chritton v. Nat’l Transp. Safety Bd.*, 888 F.2d 854, 856 (D.C. Cir. 1989) (defining substantial evidence). And reliance on the executive orders’ unsupported, generalized conclusions is unreasoned. *Sinclair Wyo. Ref. Co. LLC v. EPA*, 114 F.4th 693, 714 (D.C. Cir. 2024).

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). The Energy Emergency EO was issued pursuant to claimed authority from the National Emergencies Act.⁶ Congress explained that the 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). And 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).⁷ Thus, the burden is on the Department (which stands in the shoes of the “Commission”) to demonstrate that there is an emergency within the narrow terms of Section 202(c); simply pointing to the Energy Emergency EO or the Grid Reliability EO without providing actual evidence that an emergency exists cannot provide the substantial evidence needed to sustain the Order.

The Order’s fifth basis for finding a long-term emergency is the Department’s July Resource Adequacy Report. Order at 3 (citing Ex. 1-35 at 1 (July Resource Adequacy

⁶ 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. 1-36, 90 Fed. Reg. at 8434 (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.”).

⁷ The Department has exercised certain powers under Section 202(c) since the DOE Organization Act of 1977. *See* 42 U.S.C. § 7151(b).

Report)). But the Order’s claim that there is an emergency in the WECC Northwest assessment area does not appear to be based on or informed by the Department’s July 2025 Report, notwithstanding the Order’s citation to that report. That is because the Order’s discussion of the July 2025 Report is strictly limited to (1) mentioning that the report was issued pursuant to presidential directive and (2) inserting a conclusory quotation regarding “the Nation’s power grid” found on page 1 of the report. *Id.*

Moreover, even granting for argument’s sake that the July 2025 Report does not contain the myriad inaccurate assumptions and methodological flaws discussed below, the July 2025 Report undercuts the Order’s emergency determination. The July 2025 Report depicts the “Washington Region” and the “Oregon Region” as some of the lowest risk areas of the country in 2030. *See* Ex. 1-35 at 6, 37 (July Resource Adequacy Report). And according to the July 2025 Report, the normalized unserved energy in 2030 in the “West Non-CAISO” region⁸ is lower than any other region of the country. *See* Ex. 1-01 at 16–17 (Current Energy Group Report).

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. 1-35 at 2–3, 15–17 (July Resource Adequacy Report), that the July 2025 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 justify the 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 provide the basis for a Section 202(c) order.

The July 2025 Report does not credibly project conditions in 2030 because of its many inaccurate assumptions and methodological errors. *See* Ex. 1-02 at 9–10 (Grid Strategies Resource Adequacy Report). The Department is on notice of these flaws. *See, e.g.,* Ex. 1-40 at *passim* (PIOs’ RFR of July Resource Adequacy Report); Ex. 1-40a at 2 (Department’s Response to PIOs’ RFR of July Resource Adequacy Report). Yet the Order cites the July 2025 Report without providing a reasoned explanation of how it could credibly rely on the report in light of the identified flaws.

Most glaringly, the Department’s July 2025 Report overestimates demand growth and expected facility retirements while underestimating the likelihood of new entry.

⁸ The “West Non-CAISO” region is roughly, according to the report’s delineations, the Western continental United States excluding the California Independent System Operator and nearby areas. *See* Ex. 1-35 at 6, 35, 37 (July Resource Adequacy Report).

This biases the entire report in the direction of over-identifying resource adequacy concerns. Ex. 1-41 at 21–25 (Inst. Pol’y Integrity Report); Ex. 1-42 at 2–4 (GridLab Report); Ex. 1-40 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. 1-43 (Duke University Rethinking Load Growth Study)).

The July 2025 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. 1-41 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. 1-35 at 2 (July Resource Adequacy Report). However, the July 2025 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 July 2025 Report also departs from sound statistical reasoning by, for instance, 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 loss-of-load expectation is averaged across all simulated weather years. Ex. 1-41 at 19 (Inst. Pol’y Integrity Report); Ex. 1-35 at 7, 9, 27 (July Resource Adequacy Report). The report also added more “perfect capacity” (in megawatts) within its modeling than actually needed to bring regions to its targeted Normalized Unserved Energy level. Ex. 1-41 at 26 (Inst. Pol’y Integrity Report); Ex. 1-35 at 19, 27, 30, 32, 40 (July Resource Adequacy Report). These analytical failings in and of themselves disqualify the report as a viable source of evidence for an emergency finding.

Finally, on its opening page, the July 2025 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. Ex. 1-35 at i (July Resource Adequacy Report). The report’s generalized analysis based on incomplete information is simply insufficient to justify a Section 202(c) emergency finding for the WECC Northwest assessment area or any other specific region.

Additionally, the Order fails to consider many other facts and processes that undercut its emergency claim. Utilities engage in regular, periodic electric resource planning to acquire the resources they will need to meet future customer demand. *See, e.g., infra* sec. V.A.3.iii; Ex. 1-01 at 3–8 (Current Energy Group Report); Ex. 1-02 at 1–2 (Grid Strategies Resources Adequacy Report); Ex. 1-05 at 7–9 (Telos Resource Adequacy Report). The Order does not provide any evidence that utility planning processes, as well as state public utility commissions’ proceedings and oversight, are insufficient to address any need for resources in 2031 and beyond.

Electric utilities have experienced periods of increased demand before, and they have successfully dealt with forecasted increases in demand. For example, during the 1970s, many electric utilities expected increased demand, and thus a number of new generating facilities were built in the 1970s and 80s. Ex. 1-108 at 6–7 (UT Austin Article).

The mere fact that a resource assessment indicates the need for new resources several years ahead of time is not evidence of an energy emergency—instead, this is a feature of utility resource planning, which exists in part so that utilities can procure new resources to meet any increase in demand. Electric utilities throughout the WECC Northwest assessment area are engaged in ongoing efforts to procure new resources needed to come online in future years to meet customer demand. For example, Xcel currently has two proceedings pending before the Colorado Commission to acquire new utility-scale resources: the Near-Term Procurement, in which it has proposed to acquire over 4,900 MW of resources that would come online between 2027 and 2030, Ex. 1-93 at 4–5 (Xcel 2025 Near Term Procurement Report), and a separate procurement in Proceeding No. 24A-0442E in which Xcel will seek additional utility-scale generating resources with in-service dates through 2031, Ex. 1-94 at 154–73 (Xcel 2024 JTS, Volume 2 Technical Appendix) (showing the new resources that would be added for each of the portfolios that were modeled). Xcel’s pending resource procurement proceedings focused extensively on load growth, and the procurement is designed to meet any need for new resources in light of load growth through 2031.

Utilities throughout the WECC Northwest assessment area have similar plans to procure new generating and storage resources through 2031 and beyond. As another example, PacifiCorp, which is one of the largest utilities in the West, has pending procurements in Oregon and Utah for new resources that would come online between now and 2030. Ex. 1-109 at 1 (2025 PacifiCorp Oregon RFP Update) (noting that as of October 2025, PacifiCorp has issued its request for proposals for new resources to serve Oregon customers); Ex. 1-110 at 1 (2025 PacifiCorp Utah RFP) (stating that PacifiCorp is soliciting requests for generation resources “to meet 600,000 MWhs of average annual forecasted demand” for customers in Utah).

In fact, each of the Craig Co-Owners already has a plan in place for procuring any incremental resources needed on a longer-term basis. Tri-State, the operator of Craig, has found that even after Craig retires, Tri-State does not have a need for any new generating resources until 2035. Ex. 1-89 at 8 (Tri-State 2025 Annual Progress Report) (showing that Tri-State does not have a need for additional capacity until 2035). Platte River, Xcel, Salt River Project, and PacifiCorp have identified a need for new resources at various points between the spring of 2026 and 2030, but have plans in place to procure those resources. Platte River’s Board has adopted the preferred portfolio in its 2024 IRP, which entails acquiring new generating and storage resources through 2030. Ex. 1-92 (Platte River 2024 IRP). Xcel is currently engaged in two procurements (the Near Term Procurement and the Just Transition

Solicitation) to acquire new utility-scale generating and storage resources with in-service dates through 2030. Ex. 1-93 (Xcel 2025 Near Term Procurement Report); Ex. 1-97 (Colorado Commission Decision No. C25-0747). Salt River Project has an action plan to acquire new resources through 2030. Ex. 1-100a–b (Salt River Project 2023 IRP). PacifiCorp’s 2025 IRP lays out an action plan to acquire new resources, including through its pending RFPs in Oregon and Utah. Ex. 1-99 (PacifiCorp 2025 IRP); Ex. 1-109 (PacifiCorp 2025 Oregon RFP); Ex. 1-110 (PacifiCorp 2024 URC RFP). Each utility’s analysis shows that its planned acquisition of resources will fill any future resource needs, showing that none of the owners of Craig Unit 1 expects a shortage of energy or capacity that would necessitate keeping Craig Unit 1 available. This is to be expected, given that the utilities have been planning for the retirement of Craig Unit 1 since 2016.

Other utilities and actors are similarly planning and acting to ensure resource adequacy and reliability. The Order fails to consider documents and processes of the Power Council, the Western Power Pool, WECC, Bonneville, Washington State, and Puget Sound Energy. *See* Ex. 1-01 at app’x A at 11–33 (Current Energy Group Report) (collecting and examining studies). For instance, on November 19, 2025, the Washington Agencies reported to Governor Bob Ferguson that recent “[r]eliability assessments . . . indicated that the Northwest’s electrical grid meets national resource adequacy criteria over the near and medium terms under a broad range of operating conditions.” Ex. 1-155 at PDF 2 (Washington Agencies Resource Adequacy Meeting Summaries (Compiled)).

Another planning document, this one from E3, identifies resource gaps that are filled by planned resources in utilities’ integrated resource plans. Ex. 1-159 at 4 (Email Correspondence with E3); Ex. 1-157 at 10, 21 (E3 Resource Adequacy Phase 1 Presentation). The E3 presentation thus demonstrates the traditional actors’ role in planning to secure resource adequacy. Moreover, the E3 presentation assumes a static level of imports across all years that is below the studied region’s demonstrated import capability; that level of imports “is not intended to represent the maximum import capability of the region E3 studied.” Ex. 1-159 at 3 (Email Correspondence with E3).⁹

⁹ The E3 presentation’s long-term projections are also subject to significant uncertainty. According to an independent evaluation of the E3 Presentation, “[t]he scale and nature of the winter resource adequacy challenge in the Pacific Northwest depends strongly on future load growth, which remains highly uncertain due to both data center demand and electrification trends,” while “[l]arge load flexibility could mitigate most or all near-term winter resource adequacy needs under most load scenarios.” Ex. 1-158 at 12–13 (Sylvan & GridLab Independent Evaluation of E3

The Order also fails to reconcile its findings with the Department's own findings elsewhere. For instance, according to the Department, "NERC's FERC-approved comprehensive enforcement mechanism ensures 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." Ex. 1-120 at 6 (Department Export Authorization EA-365-C (Oct. 21, 2025)).

Engaging in reasoned decision-making based on a planning document, such as the E3 presentation, necessitates following important basic principles. The fact that a study shows that, under certain conditions, a utility or region might, in a future year, fall below a specific resource adequacy goal that is based on a 1-in-10 LOLE standard does not by itself predict or guarantee that a loss of load event will actually occur. Instead, it indicates future conditions in which system planners might expect more than one shortfall per decade if both those future conditions materialize and if no actions are taken by the utilities and regional entities to address a potential, future shortfall. *See* Ex. 1-01 at 2–6 (Current Energy Group Report). Importantly, a small deviation below the resource adequacy goal will be associated with a small increase in this likelihood (and vice versa). This fact is relevant in the context of system planning because the tradeoff between grid reliability and energy costs is a core part of system planning: no system is ever 100% reliable, and ratepayers do not want to spend too much of their income on energy bills. *See id.* at 5; Ex. 1-159 at 4 (Email Correspondence with E3) ("Any electric system will have some level of resource adequacy risk."). Indeed, for this reason, both MISO and PJM have explicit conditions in their tariffs that allow for each grid operator to fall below the 1-in-10 LOLE threshold as part of their response to potential higher capacity prices. Thus, treating a potential short- or medium-term dip in the size of the planning reserve margin as an emergency belies both industry practice that explicitly allows for such dips and basic system planning principles.

In sum, even if there were a need for additional generating resources in some future year, the Order fails to consider that utilities have pending and scheduled procurements of new resources. There is no evidence that these pending and scheduled procurements will be insufficient to address any long-term resource needs. And in addition to the many relevant processes and sources the Order fails to consider, the Order is unreasoned in its reliance on the few sources it does cite. As

Presentation). In fact, even assuming that only resources already in development come online by 2030, Sylvan and GridLab conclude that in 2030 "large load management could reduce average outages among other customers during critical winter weather conditions from 19 hours to 0.1 hours." *Id.* at 16, 41.

such, the Order's claimed long-term emergency is not based on reasoned decision-making and is not based on substantial evidence.

3. The Order Does Not, and Could Not, Provide Valid Evidence or Reasoned Decision-Making to Support Its Stated Near-Term Resource Adequacy Concerns.

The claimed near-term emergency in the Order is unspecific. And none of the sources cited in the Order, separately or together, establishes factual circumstances that come close to a near-term emergency or otherwise meeting the definition of "emergency" that permits Departmental action under Section 202(c). 16 U.S.C. § 824a(c)(1). The Order also relies on these sources in a vacuum, failing to consider many other analyses of which the Department is aware or should be aware (including the Department's own analysis) that undercut its near-term emergency claim. Planners in the WECC Northwest assessment area have already determined that near-term reliability and resource adequacy in the regional grid is secure (even with Craig's retirement). Utilities and other load-responsible entities in the WECC Northwest assessment area have prepared diligently for the retirement of Craig for nearly a decade. There is no factual or legal basis for the Order's declared near-term emergency. The Order's 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 Order is unreasoned, not based on substantial evidence, and otherwise contrary to law and regulation because the Order fails to provide any specific determination of the energy emergency that purportedly exists. Instead, the Order relies on vague and generalized assertions. The Order fails to provide any specific determinations as to the amount of claimed shortfall, the time period over which the claimed shortfall exists, and whether the claimed shortfall is for energy, capacity, or both.

First, the Order does not provide a specific, quantitative determination of the shortage of energy or capacity that allegedly exists. The Order does not say, for instance, whether the alleged shortage is for 1 MW, 100 MW, or 1000 MW. The Department does not even provide a range for the alleged shortage.

Second, the Order does not specify over what time period an energy emergency exists. The Order lasts for 90 days, but most or all of the Order's discussion of evidence for the claimed shortfall pertains to time periods much further in the future. Moreover, the Order does not specify whether the Department has determined that an emergency exists now, or merely that an emergency will exist at some future date. The Order is unclear, for example, whether the Department has ordered Craig to

remain available solely because the Department believes that an emergency may exist at some future date.

Third, the Order is not clear as to whether the purported shortfall is for energy, capacity, or both. In the electric utility industry, there is a fundamental distinction between energy and capacity. Energy refers to the electricity produced over a given period of time, such as kilowatt-hours or megawatt-hours. Meanwhile, capacity refers to the maximum output a facility can provide, under specific conditions, and at an instant in time. The distinction between energy and capacity runs throughout the electricity industry, informing how contracts are structured (e.g., different payments for energy versus capacity) and how markets are organized (e.g., there are separate energy and capacity markets). The Order is not clear on whether the Department believes that there is a shortfall in energy, capacity, or both.

In relying on generalized assertions and failing to identify the information above, the Order is unreasoned. *Ariz. Pub. Serv. Co. v. United States*, 742 F.2d 644, 649 n.2 (D.C.Cir.1984) (“[M]ere conjecture and abstract theorizing offered in a vacuum are inadequate to satisfy us that the agency has engaged in reasoned decisionmaking.”). The Order is also inconsistent with the Department’s applicable regulations, which provide that “[a]ctions under this authority are envisioned as meeting a specific inadequate power supply situation.” 10 C.F.R. § 205.371.

ii. The Sources Cited in the Order Do Not Support the Existence of a Near-Term Emergency.

The Order’s claimed near-term emergency is unreasoned and not supported by substantial evidence for many of the reasons discussed *supra* sec. V.A.2.ii. These reasons include the failure to grasp or even discuss the functions and conclusions of the sources cited in the Order; the focus on retirements without considering generator additions; the focus on projected demand growth without considering projected growth in supply; the mathematical mistakes and methodological errors committed by the Department; the geographic mismatches between the Order’s claimed emergency footprint and the regions evaluated in the sources cited in the Order; and the reliance on executive orders containing no facts. *See id.*

There are additional aspects of the sources cited by the Order that undermine the claimed near-term emergency. As an example, for 2026, the 2024 Long-Term Reliability Assessment projects no unserved energy or loss-of-load hours in the “WECC-NW” region (which, again, includes and extends beyond the WECC Northwest assessment area defined in the Order), and projects that the on-peak reserve margin in that region exceeds the target reserve margin. Ex. 1-07 at 129 (NERC 2024 Long-Term Reliability Assessment). This is shown in Figure 15 below.

Figure 15: 2024 Long-Term Reliability Assessment Findings of “Negligible” Expected Unserved Energy and Loss of Load Hours Risk

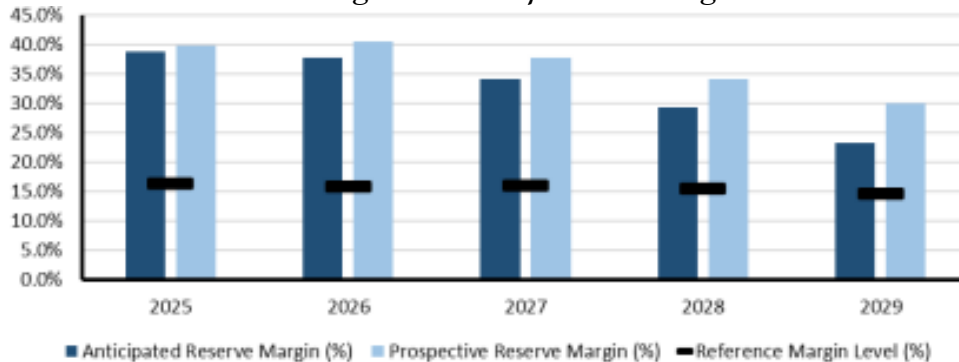
Base Case Summary of Results			
	2026*	2026	2028
EUE (MWh)	1,722	0	1
EUE (PPM)	4	0	0
LOLH (hours per year)	0.04	0	0
Operable On-Peak Margin	37.6%	36.1%	27.8%

* Provides the 2022 ProbA Results for Comparison

Source: Ex. 1-07 at 129 (NERC 2024 Long-Term Reliability Assessment).

As for capacity, the 2024 Long-Term Reliability Assessment estimates that the region would have enough capacity to meet target reserve margins in 2026 (and in subsequent years). *Id.* at 127. This is shown in Figure 16 below:

Figure 16: 2024 Long-Term Reliability Assessment Depiction of Reserve Margins and Reference Margin Level



Source: Ex. 1-07 at 127 (NERC 2024 Long-Term Reliability Assessment).

Thus, the 2024 Long-Term Reliability Assessment does not support the Order’s determination of a near-term emergency. Instead, the assessment reaches the contrary conclusion: there is sufficient energy and capacity for the WECC Northwest region in 2026 (and in the following years until 2031). *See id.* at 127–29; Ex. 1-01 at 13–14 (Current Energy Group Report); Ex. 1-02 at 7–8 (Grid Strategies Resource Adequacy Report).

The 2024 Western Assessment of Resource Adequacy also includes additional information undermining the Order’s claimed near-term emergency. Most glaringly, the study finds *no demand at risk hours in 2026 and almost none in 2027* in the three subregions that subsume (and extend beyond) the claimed emergency footprint. *See* Ex. 1-01 at 10–11 (Current Energy Group Report). This is shown in Figure 17 below.

*Figure 17: Summary of Demand-at-Risk Hours Identified in
2024 Western Assessment of Resource Adequacy*

Subregion	2026 Demand-at-Risk Hours in Most Extreme Scenario	2027 Demand-at-Risk Hours in Most Extreme Scenario
NW Central	0	0
NW Northeast	0	0
NW Northwest	0	~7

Source: Ex. 1-01 at 11 (Current Energy Group Report).

The Order also fails to come to grips with the 2024 Western Assessment of Resource Adequacy’s anticipation of 10 GW of new generation in 2026, of which more than 4 GW is firm capacity, and the support for this anticipation in recent data from the Energy Information Administration. *Id.* at 11; *see also* Ex. 1-29 at 27–29 (FERC Staff Winter Reliability Assessment) (explaining that in the WECC region, 14.1 GW of nameplate capacity additions are completed or expected from March 2025 through February 2026, including roughly 7 GW of additions expected between October 2025 and February 2026). In addition, utilities have accounted for peak demand, including the possibilities of increases in peak demand, and concluded in their electric resource planning that they will not have an energy or capacity shortfall in the absence of Craig being available. *See* Ex. 1-02 at 2–5, 8–9 (Grid Strategies Resource Adequacy Report).

Regardless of the exact modeling software and reliability metrics used, standard approaches to assessing the probability of energy shortfalls consist of modeling utilities’ available generating and storage resources in light of expected customer demand. *See, e.g.,* Ex. 1-01 at 3–8 (Current Energy Group Report). This typically includes a “de-rate” of resources based on the likelihood that a generator will be unavailable or produce less than its maximum potential output (*i.e.*, less than its “nameplate capacity”) during a peak demand period, a computation whose result is known as “accredited capacity.” *Id.* at 5. The Department does not attempt, on its own or based on the cited sources, to assess for Colorado or any other region the probability of shortfalls or the available resources in light of expected demand. Instead, the Department simply tallies retirements of certain types of resources, which logically and analytically cannot answer the question of whether the resources that actually exist today are adequate to serve electricity needs in 2026.

While the Department has failed to conduct any methodologically sound analysis of whether an energy shortfall exists in Colorado, Colorado’s electric utilities have done such analyses. As further discussed *infra* sec. V.A.3.iii, Tri-State’s analyses conducted in 2025 concluded that it would have no unserved energy and no loss of load hours in 2026, even without the availability of Craig, and Platte River reached a similar conclusion in 2024.

Finally, the Department's July 2025 report does not address whether an energy emergency exists prior to 2030, much less in the first three months of 2026. Thus, the report does not support the claimed near-term emergency either.

iii. Many Sources Not Cited in the Order Undercut the Claimed Near-Term and Long-Term Emergency.

The Department also fails to consider many sources undercutting the claimed near-term and long-term emergency. These include planning by the Craig Co-Owners and their state regulators and boards, as well as broader planning and monitoring from states, regional entities, and private utilities. The Order is, consequently, unreasoned and not based on substantial evidence.

a. Planning by Craig Co-Owners and Their State Regulators and Boards

In 2016, the Craig Co-Owners announced that Craig would close by December 31, 2025.¹⁰ 83 Fed. Reg. 31332 (July 5, 2018) (approving Colorado's SIP revision establishing Craig's closure date); Ex. 1-65 at 183 at § F.VI.D.1 (CDPHE Regulation No. 3) (Colorado Regulation No. 3 provision regarding Craig's closure, which EPA approved). As discussed below, in the decade since they made that announcement, the Craig Co-Owners have built and contracted for new generation, storage, and transmission resources such that they do not need Craig after 2025 to reliably serve their customers. Three of the Craig Co-Owners (PacifiCorp, Tri-State, and Xcel) are regulated by state public utility commissions, while the remaining two (Platte River and Salt River Project) are governed by their respective boards. But regardless of the governance structure and regulatory status of the utility, each co-owner's regulator or board has approved resource plans that include retiring Craig by December 31, 2025. Each of the Craig Co-Owners has determined that it does not need the Unit over the next 90 days or on a longer-term basis.

Even if any short-term need for additional resources were to emerge during the 90-day period covered by this Order (and there is no evidence that any such need will arise), utilities like the Craig Co-Owners have processes in place for addressing any unexpected short-term need, and thus this Order is unnecessary. Utilities have multiple ways to acquire additional supply-side generating resources quickly. Reserve sharing arrangements are in place that allow utilities to call on resources on a short-term basis, including on a seasonal basis for the winter of 2025-2026. *See, e.g.,*

¹⁰ The Craig Co-Owners reached a settlement agreement, which was incorporated into Colorado's regional haze SIP and approved by EPA, in which they agreed to either close Craig Unit 1 by December 32, 2025 or cease burning coal at Craig Unit 1 by August 31, 2021 (with an option to convert the unit to burn natural gas by August 31, 2023). Of these two compliance pathways, the Co-Owners elected to close Craig Unit by December 31, 2025.

Ex. 1-94 at 118 (Xcel 2024 JTS, Volume 2 Technical Appendix) (describing Xcel’s participation in a reserve sharing program). And utilities participating in the two energy imbalance markets operating in the West can use those markets to purchase any resources needed on an intra-hour basis. *See* Ex. 1-131 at 7–8 (FERC Western Energy Markets Explainer). Utilities also have a suite of demand-response programs, including from interruptible service contracts with large commercial customers that allow the utility to interrupt service to large customers under specific conditions, and comparable programs with individual residential customers allowing the utility to, for example, reduce demand from air-conditioning during summer peak hours. *See generally* Ex. 1-94 at 101, 135, 182–83 (Xcel 2024 JTS, Volume 2 Technical Appendix) (explaining how Xcel relies on demand response programs, including interruptible loads).

Tri-State

For Tri-State, the Colorado Commission has approved two electric resource plans that include retiring Craig by December 31, 2025. The Colorado Commission provided its final approval of Tri-State’s 2020 resource plan in 2023, Ex. 1-85 at 34 (Colorado Commission Decision C23-0437), and the plan assumed that Craig would retire by the end of 2025, Ex. 1-86 at 20, 31, 43, 53, 64 (Tri-State 150-Day Implementation Report) (showing that in all portfolios, Craig ceases to generate electricity after 2025). Tri-State concluded in its 2020 resource plan that it could reliably operate its system after 2025 without Craig. *See id.*

Tri-State reached the same conclusion—that it does not need Craig for reliability purposes—in its 2023 resource plan. Each portfolio that Tri-State modeled in its 2023 resource plan was required to meet strict reliability criteria, including during extreme weather events, and every portfolio assumed that Craig retires at the end of 2025. Ex. 1-87 at 21–22, 31–32, 42–43, 54–55, 64–65, 75–76 (Tri-State 2023 ERP 120-Day Implementation Report) (showing that in all portfolios, Craig retires at the end of 2025). After assuming that Craig would not provide any energy or capacity after 2025, Tri-State found that each portfolio would be reliable because each portfolio met Tri-State’s reliability and resource adequacy requirements. *Id.* at 95 (“Each of the portfolios met Level 1 and 2 Reliability Metrics.”).

Tri-State does not have either a near-term or intermediate-term need for additional capacity or energy sources after 2025. Specifically, Tri-State recently found that it does not have a need for additional capacity until 2035, even assuming that Craig retires on December 31, 2025: “Tri-State stated within Phase I of the 2023 ERP that it did not forecast a capacity shortfall until 2029. With the updated load forecast, shown above, utilized in Phase II and Phase II preferred portfolio resources, a capacity shortfall is not forecasted to occur until 2035.” Ex. 1-89 at 8 (Tri-State 2025 Annual Progress Report). The loads and resources table in Tri-State’s 2025 Annual Progress Report shows that Tri-State will have surplus capacity from 2026 through

2034, even without Craig. *Id.* at 10. Note that the surplus is calculated relative to the total amount of resources needed to both meet peak demand and have planning and operating reserves. *See id.* Thus, the surplus shows Tri-State has sufficient capacity to meet its peak demand, plus additional capacity in the form of planning and operating reserves, and then has even more capacity beyond what is needed to meet peak demand and reserves. Furthermore, the loads and resources table in which Tri-State estimates a capacity surplus through 2034, *id.*, assumes that Tri-State makes no market purchases and instead is based solely on Tri-State's owned and contracted resources, *see id.* In addition, Tri-State conducted reliability analyses in 2025 to stress-test its system under extreme winter and summer weather (including by making multiple worst-case scenario assumptions related to reduced availability of resources during extreme weather events, length of extreme weather events, reduced availability of imports, etc.) and concluded that it has sufficient capacity for 2026 and beyond even under extreme winter and summer weather events. *See* Ex. 1-86 at 6–8, 14–15, 28, 40, 51 (Tri-State 150-Day Implementation Report); Ex. 168 at 1–4 (Tri-State Extreme Weather Event Modeling Assumptions) (listing all of the modeling assumptions that are a part of Tri-State's analysis of its system under extreme weather events).

The Colorado Commission approved Tri-State's 2020 and 2023 electric resource plans, which both included retiring Craig by December 31, 2025. Ex. 1-90 at 41 (Colorado Commission Decision No. C25-0612). In its August 2025 decision approving Tri-State's current resource plan, the Colorado Commission expressly found that Tri-State does not need Craig after 2025 to maintain a reliable electric system:

Craig is not required for reliability or resource adequacy purposes based on the record in this ERP. Every portfolio that Tri-State modeled assumes that Craig retires at the end of 2025 and does not provide any energy or capacity after 2025. At the same time, Tri-State convincingly concludes that every portfolio meets all reliability metrics and is reliable.

Id. at 40.

Since 2016, Tri-State has acquired and/or built new generating, storage, transmission, and demand-response resources, and Tri-State's member cooperatives have also added their own resources (Tri-State allows member cooperatives to self-supply some of their electricity and procure the remainder from Tri-State). Ex. 1-89 at 12, Figure 4 (Tri-State 2025 ERP Annual Progress Report) (showing that, since 2016, Tri-State has added more than 600 MW of utility-scale and small-scale hydropower, wind, and solar); *id.* at 10–11 (stating that, as of December 2025, Tri-State had signed contracts for 500 MW of new storage resources and 200 MW of new wind resources, and is continuing contract discussions for additional resources).

Platte River

Platte River prepared a resource plan in 2020 that modeled several portfolios, each of which assumed that Craig would retire by December 31, 2025. Ex. 1-91 at 20, 26, 67, 87–90 (Platte River 2020 IRP). Platte River’s Board then voted to approve a portfolio that included retiring Craig by December 31, 2025.

Platte River’s current resource plan was developed in 2024. Like the 2020 plan, the 2024 plan included retiring Craig by December 31, 2025. Ex. 1-92 at 30, 106, 179 (Platte River 2024 IRP). Platte River’s Board then voted to approve a portfolio from the 2024 resource plan that included retiring Craig by December 31, 2025. *Id.*, Appendix C at PDF 211–215.

Both the 2020 and 2024 plans contained action plans to procure additional generating and storage resources to meet electricity demand in Platte River’s service territory. *Id.* at 176–79.

Platte River’s 2020 and 2024 resource plans followed similar methodologies. *Compare* Ex. 1-92 at *passim* (Platte River 2024 IRP), *with* Ex. 1-91 at *passim* (Platte River 2020 IRP). Platte River’s 2024 plan, for instance, contained forecasts of Platte River’s expected load, including in 2026 and beyond, based on expected load growth in Platte River’s service territory. Ex. 1-92 at 57–96 (Platte River 2024 IRP). Historically, Platte River has experienced its peak electricity demand in the summer, and it forecasts demand in summer to remain significantly higher than in winter through 2050. *Id.* at 61.

The 2024 plan analyzed reliability and resource adequacy using several metrics and by stress testing the portfolios under extreme weather scenarios. *Id.* at 120–31. In all of its modeling, Platte River concluded that it could maintain a reliable system after Craig closes at the end of 2025. *Id.* at 145–55. Platte River’s electric resource plans indicate that Platte River does not have a near-term need for additional capacity or energy in the near-term or in the intermediate term.

Since 2016, Platte River has contracted for and/or built new generating, storage, transmission, and demand-response resources. Platte River added 30.5 MW of new solar in 2016, 225 MW of new wind resources in 2020, 22 MW of new solar in 2020, 1 MW of new storage in 2020, and 150 MW of new solar in 2025; and it plans on adding 150 MW of new solar and 25 MW of 4-hour storage in 2026. Ex. 1-92 at 106–08 (Platte River 2024 IRP). The 2024 IRP also calls for additional acquisitions from 2024 onward, including procuring up to 200 MW of additional thermal generation, additional storage capacity, and additional virtual power plants. *Id.* at 176–79.

Public Service Company of Colorado (Xcel)

In the years since 2016, Xcel has contracted for and/or built new generating, storage, transmission, and demand-response resources. The primary resource

solicitations were conducted in the 2016 and 2021 resource plans. In the 2016 electric resource plan, the Commission approved Xcel acquiring the following new resources: 1,100 MW of wind; up to 700 MW of solar; up to 275 MW of storage; and 383 MW of gas. Ex. 1-101 at PDF 1 (Xcel Information Sheet on Colorado Energy Plan).

Xcel filed its most recent regular electric resource plan in 2021 and has pending resource procurements underway currently. In all portfolios that it presented to the Colorado Commission for selection, Xcel's 2021 resource plan assumed that Craig would retire by the end of 2025; and in that proceeding, the Colorado Commission approved two portfolios that assumed that Craig would retire by the end of 2025. Ex. 1-164 at 125 (Colorado Commission Decision No. C24-0052); Ex. 1-165 at 70 (Colorado Commission Decision No. C25-0024).

In the 2021 electric resource plan, the Commission's Phase II decision approved the "Alternative Portfolio," consisting of 5,854 MW of new generating and storage resources (which included 669 MW of new gas). Ex. 1-102 at 92, 101 (Colorado Commission Decision No. C24-0052). The Company is on track to procure the new resources approved in its 2021 resource plan. Ex. 1-103 at 14–17 (2025 Xcel ERP Annual Progress Report). As noted above, Xcel also has two resource acquisitions pending in the Near-Term Procurement and the Just Transition Solicitation.

Currently, Xcel has two resource procurement dockets pending for its electric system. In the Near Term Procurement Report, Xcel has proposed to acquire approximately 4,900 MW of new resources that would come online between 2027 through 2030. Ex. 1-93 at 4 (Xcel 2025 Near Term Procurement Report). The load forecast for the Near Term Procurement Report assumes the retirement of Craig at the end of 2025. Xcel states in the report that it has executed short-term contracts for resources for 2026 to ensure that Xcel can meet peak load in 2026. *Id.* at 29. In combination with its owned and contracted resources, these short-term purchases will ensure that Xcel has sufficient resources to reliably serve load in 2026.

Xcel is also undertaking another procurement called the "Just Transition Solicitation" ("JTS") in which Xcel is separately seeking supply-side resources with in-service dates between now and the end of 2031. In all of the modeling undertaken for the JTS, Xcel assumed that Craig would retire by the end of 2025. Ex. 1-94 at 85 (Xcel 2024 JTS, Volume 2 Technical Appendix). In that proceeding, Xcel included multiple load forecasts, each of which accounted for expected load growth, including from large commercial customers such as data centers. Currently, Xcel's peak electricity demand occurs in summer. *Id.* at 52, 58. Xcel forecasts that its system will remain summer peaking through at least 2030. *See id.* Xcel found that all of the generic portfolios modeled in Phase I would be reliable, *see id.* at 121 (noting that "system reliability is factored into the development of portfolios in an iterative process that involves inputting various reliability requirements upfront into the EnCompass modeling process" to ensure that the portfolios are reliable), and all of these portfolios included retiring Craig by the end of 2025.

On August 12, 2025, the largest coal unit on Xcel's system, Comanche Unit 3, went out of service as a result of a forced outage. In November 2025, Xcel petitioned the Colorado Commission for a one-year variance from the requirement to retire Comanche Unit 2 by the end of 2025. The Colorado Commission granted the variance solely because of the outage at Comanche Unit 3 (Comanche Unit 3's approved retirement date is January 1, 2031). Ex. 1-95 at 25–26 (Colorado Commission Decision No. C25-0892). The Colorado Commission did not indicate there is a need to extend the life of any unit other than Comanche 2. *See id.* And the Petition did not request a variance from any retirement deadline other than a one-year extension for Comanche 2. *See* Ex. 1-96 (Comanche Unit 2 Variance Petition).

For the years after 2026, Xcel has a series of resource procurements through which it will meet any resource needs after 2026. Specifically, the Colorado Commission has scheduled the following procurements: the base solicitation in the Just Transition Solicitation in 2026; the supplemental solicitation in the Just Transition Solicitation in 2027; and Phase I of the electric resource plan in 2028. Ex. 1-97 at 50 (Colorado Commission Decision No. C25-0747).

Thus, if Xcel has any resource needs after 2026, the Colorado Commission has approved a schedule of procurements to fill any resource needs after 2026. Moreover, the Company regularly acquires short-term resources between scheduled procurements through short-term capacity purchases, as noted in the December 5, 2025 Near Term Procurement Report, and the Commission also approved an Incremental Need Pool process by which the Company can procure resources in-between scheduled procurements. *Id.* at 39–40, 44–45.

Xcel does not have a need for additional capacity or energy over the next 90 days, and there are multiple, established processes in place for Xcel to acquire resources over the next several years to meet any resource needs for future years.

PacifiCorp

PacifiCorp prepares IRPs roughly every two years. For the 2023 IRP Update, PacifiCorp assumed that Craig retires at the end of 2025 in all portfolios. Ex. 1-98 at 13, 88, 115 (PacifiCorp 2023 IRP Update). PacifiCorp prepared load forecasts covering the years 2026 and beyond that reflected anticipated load growth across its service territory. *Id.* at 39–51. PacifiCorp conducted extensive modeling of reliability and resource adequacy. In the 2023 IRP, PacifiCorp adopted a preferred portfolio that included retiring Craig at the end of 2025. PacifiCorp found that this portfolio would be consistent with maintaining the reliability of its system.

While PacifiCorp made certain methodological changes in its 2025 IRP and used different values for certain inputs, PacifiCorp's 2025 IRP was similar to its 2023 IRP in several important respects. The 2025 IRP contained forecasts of demand—which include forecasts of expected load growth—throughout PacifiCorp's service territory

for the years 2026 and beyond. Ex. 1-99 at 114–40 (PacifiCorp 2025 IRP). On the supply side, PacifiCorp assumed that Craig would close at the end of 2025 and thus not provide any capacity or energy to PacifiCorp’s system after 2025. *Id.* at 13, 51, 287, 294. PacifiCorp evaluated reliability and resource adequacy using a variety of metrics, which included considering the impact of extreme weather events. *Id.* at 99–113, 192.

In its 2025 IRP, PacifiCorp reaffirmed its intent to close Craig by the end of 2025 and adopted a preferred portfolio that includes closing Craig by the end of 2025. PacifiCorp adopted its preferred portfolio in part because PacifiCorp found that the portfolio would ensure system reliability, finding that it had enough capacity to meet summer and winter peak demand in 2026 and 2027 without adding new resources. *Id.* at 136–39, *See also* Ex. 1-98 at 49–50 (PacifiCorp 2023 IRP Update). PacifiCorp’s system currently has lower electricity demand in the winter than in summer, and experiences peak demand in the summer months; PacifiCorp forecasts that its system will remain summer peaking through 2045. Ex. 1-99 at 74, 106, 114, 132–35 (PacifiCorp 2025 IRP).

PacifiCorp’s 2023 and 2025 IRPs each included an action plan that included building and procuring new generation and storage resources and transmission lines. *Id.* at 289–90. Since 2016, PacifiCorp has contracted for and/or built new generating, storage, transmission, and demand-response resources. In its 2015 IRP Update, PacifiCorp reported that for the year 2016, it would have a total of 10,131 MW of resources (both supply- and demand-side resources) across its entire system. Ex. 1-104 at 31 (PacifiCorp 2015 IRP Update). As of its most recent IRP, PacifiCorp reports that for the year 2026, it will have 11,859 MW of existing resources (owned by PacifiCorp or contracted to PacifiCorp) available to meet load in the summer, plus 3,103 MW of available market purchases. Ex. 1-105 at 132 (PacifiCorp 2025 IRP).

None of the state commissions that regulate PacifiCorp objected to PacifiCorp’s decision to close Craig by the end of 2025. The most recent PacifiCorp IRP for which state commissions have issued final decisions after proceedings to review the resource plan is PacifiCorp’s 2023 IRP. State commissions took various actions on PacifiCorp’s 2023 IRP, but no commission expressed concern about retiring Craig by the end of 2025. *See* Ex. 1-128 at 5, 7 (Order No. 24-073_OR PUC on Pac 2023 IRP) (Oregon PUC issues a final order in PacifiCorp’s 2023 IRP docket acknowledging PacifiCorp’s plan to retire Craig Unit 1 by the end of 2025); Ex. 1-129 (Utah PSC on Pac 2023 IRP) (Utah PSC issues a final order in PacifiCorp’s 2023 IRP, but does not mention any concerns with PacifiCorp’s proposal to retire Craig Unit 1 by the end of 2025); Ex. 1-130 at 3 (Idaho PUC on Pac 2023 IRP) (Idaho PUC issues a final order finding that PacifiCorp’s 2023 IRP, which proposed to retire Craig Unit 1 by the end of 2025, satisfies Idaho’s IRP requirements and the PUC acknowledges the IRP).

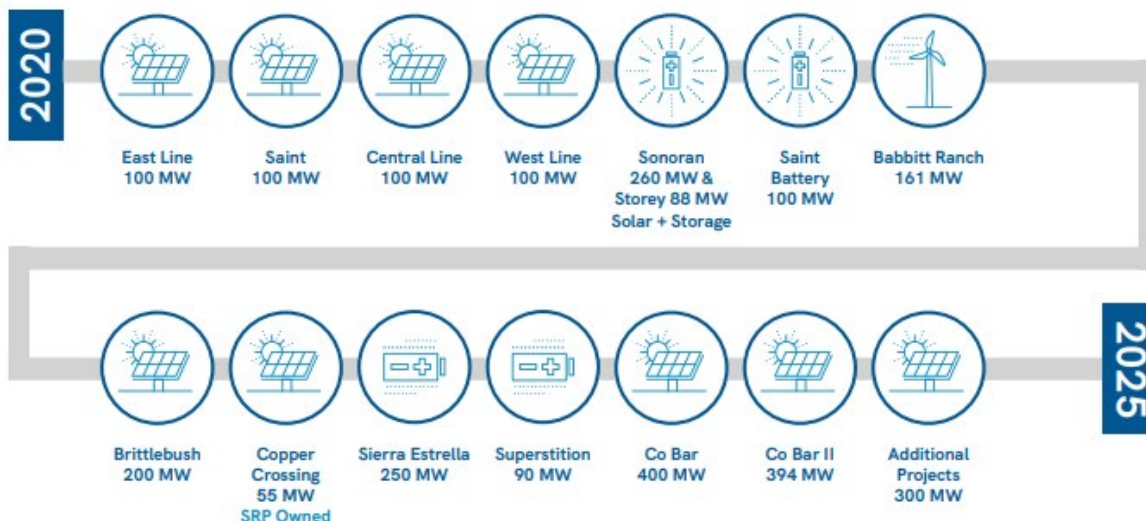
Thus, PacifiCorp does not need additional capacity and energy in the near term and has established processes in place for filling any longer-term resource need.

Salt River Project

Salt River Project’s most recent resource plan, which it calls an Integrated System Plan, was prepared in 2023. On the demand side, Salt River Project forecasted its electricity demand for the years 2026 and beyond, and included expected load growth from large commercial customers. Ex. 100a at 68–71 (Salt River Project 2023 IRP). On the supply side, the 2023 ISP assumed that Craig retires at the end of 2025. *Id.* at 27. The 2023 ISP includes a preferred portfolio and action items that include procuring new generating and storage resources as well as new transmission lines. Ex. 100b at 68–71, 145–46, 149–50, 156–60 (Salt River Project 2023 IRP). Salt River Project concluded that the plan of action it identified in the ISP, which Salt River Project called the “Balanced System Plan,” and which included retiring Craig by the end of 2025, would ensure system reliability. *Id.* at 158. Salt River Project’s Board adopted the recommendations in the 2023 ISP.

Since 2016, Salt River Project has contracted for and/or built new generating, storage, transmission, and demand-response resources. For example, between 2020 and 2025, Salt River Project acquired additional capacity from nuclear, solar, and battery resources. Ex. 1-100a at 27 (Salt River Project 2023 IRP). This is shown in *Figure 18* below.

*Figure 18: Salt River Project’s Additional Capacity
Acquired Between 2020 and 2025*



Source: Ex. 1-100a at 27 (Salt River Project 2023 IRP).

Thus, Salt River Project does not need additional near-term capacity or energy, and has established processes in place for filling any longer-term resource need.

Colorado Generally

Within Colorado, the Energy Information Administration reports that the State’s electric utilities added more than 3,000 MW of net summer capacity between 2019

and the end of 2024. Compare Ex. 1-106 at PDF 78 (Table 4.7.A) (EIA Annual 2024), with Ex. 1-107 at PDF 75 (Table 4.7.A) (EIA Annual 2019). This is shown in Figure 19 below.

Figure 19: Energy Information Administration Data on Colorado's Increases in Net Summer Capacity, 2019–2024

Net Summer Capacity, 2019 (MW)	Net Summer Capacity, 2024 (MW)	Differential, 2019–2024 (MW)
16,592	19,817	3,224

Sources: Ex. 1-106 at PDF 78 (Table 4.7.A) (EIA Annual 2024); Ex. 1-107 at PDF 75 (Table 4.7.A) (EIA Annual 2019).

MW values rounded to the nearest integer.

The values in Figure 19 do not account for the new resources that came online in 2025 or are planned to come online in 2026 and in future years. As explained in the attached Grid Strategies Report, there are at least 5,800 MW of resource additions planned for future years, through 2029, in Colorado. See Ex. 1-02 at 8–9 (Grid Strategies Resource Adequacy Report).

b. Planning and Monitoring from States, Regional Entities, and Utilities

The Department also ignores resource adequacy studies, reliability analyses, and planning documents from state regulators, regional entities, and other utilities that undercut the Department's emergency determination—including one determination that the Department *itself* made. The Department's failure to consider this cornucopia of conflicting and highly relevant evidence presents a textbook example of unreasoned decision-making that is not based on substantial evidence.

The first set of sources undercutting the claimed emergency comes from the Department. The Department has continued to grant entities the authority to export power from parts of the WECC Northwest assessment area (and other areas) into Canada. See, e.g., Ex. 1-120 at 11 (Department Export Authorization EA-365-C (Oct. 21, 2025)) (authorizing exports from multiple interconnection points in Washington State owned by Bonneville); Dep't of Energy, Export Authorization Library (last visited Jan. 28, 2026), <https://www.energy.gov/gdo/export-authorization-library>.

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. 1-62 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 portions of the WECC Northwest assessment area to Canada demonstrate the false basis of the Order’s emergency determination. For instance, in its recent export authorization issued less than two months before the Order, 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 Order does not reconcile the Order’s 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. This is unreasoned and renders the decision not based on substantial evidence.

In addition to departing from the Department’s own contemporaneous conclusions, the Order fails to address sources the Department cited just two weeks earlier in support of another (unlawful) Section 202(c) Order in the Western United States. *Compare* Order No. 202-25-11 at 1–2 (discussing the 2025–2026 Winter Reliability Assessment and the E3 Presentation), *with* Order at *passim* (failing to discuss the sources). These sources further undercut the Order’s near-term emergency determination.

The 2025–2026 Winter Reliability Assessment evaluates conditions during the majority of the Order’s duration, and particularly the coldest months, in three subregions (referred to in that assessment as WECC-Rocky Mountain, WECC-Basin,

and WECC-Northwest) roughly covering and extending beyond the WECC Northwest assessment area. Craig is located in the WECC-Rocky Mountain subregion. The 2025–2026 Winter Reliability Assessment does not identify any elevated reliability risks in the WECC-Rocky Mountain subregion; instead, NERC states that “[e]xpected resources meet operating reserve requirements under assessed scenarios.” Ex. 1-08 at 38 (NERC 2025-26 Winter Reliability Assessment). Under “extreme” conditions—namely, “[a]bove-normal peak demand combined with high generator outages in extreme conditions—the WECC-Basin subregion needs only to rely on imports from neighboring regions to maintain reserves above reference level. *See id.* at 33. While the assessment suggests “[e]xternal assistance may not be available during region-wide extreme winter conditions,” *id.* at 6, the assessment assigns no actual probability that this will occur and contains no details on the multiple necessary conditions that would need to occur for it to occur. *See id.* at 5–6, 33; *cf.* Ex. 1-02 at 6–7 (Grid Strategies Resource Adequacy Report) (explaining reasons that imports to WECC-Basin subregion are likely to be available). Moreover, the WECC-Basin subregion has, according to the assessment, the highest reference level of any WECC subregion and the second highest of any subregion evaluated in the assessment. *See* Ex. 1-08 at 44–49 (NERC 2025-26 Winter Reliability Assessment). And the assessment explains that “[t]he results of the probabilistic assessment reveal no [expected unserved energy] or [loss of load hours] for Winter 2025–2026” in the WECC-Basin subregion. *Id.* at 14. Meanwhile, in the WECC-Northwest subregion, “[o]perating reserve margins are expected to be met after imports in all winter scenarios.” *Id.* at 37.

The E3 Presentation and associated evaluations also undercut the claimed near-term (and long-term) emergency as applicable to the Pacific Northwest. The actual and forecasted conditions this winter—both those currently existing and those available to the Department on December 30, 2025—show relatively strong hydrological conditions. *See* Ex. 1-01 at app’x A at 20–23 (Current Energy Group Report); Ex. 1-159 at 4 (Email Correspondence with E3). Additionally, the E3 Presentation and an independent evaluation demonstrate the role that imports play in maintaining reserves, and how they did so during the “Big Freeze” in 2024. Ex. 1-157 at 10 (E3 Resource Adequacy Phase 1 Presentation); Ex. 1-158 at 22–23 (Sylvan & GridLab Independent Evaluation of E3 Presentation); Ex. 1-159 at 3 (Email Correspondence with E3).

The Order also fails to address several other studies demonstrating that there is no reason to believe an emergency exists in the Pacific Northwest. *See* Ex. 1-01 at app’x A at *passim* (Current Energy Group Report) (discussing studies). Notably, each of these studies reached their conclusions even after factoring in scheduled retirements. *See id.* at app’x A at 2. The reports’ conclusions complement and support the discussion above demonstrating that there is no basis for an emergency declaration in the WECC Northwest assessment area. *See supra* sec. V.A.2.ii, V.A.3.i–.iii.

Additionally, on November 4, 2025, the Washington Agencies held their 2025 winter preparedness resource adequacy meeting. The meeting notice, agenda, presentations, and video have been publicly available online since well before the Order issued on December 30, 2025. *See* Wash. Utils. & Transp. Comm’n., Resource Adequacy in Washington State (last visited Jan. 28, 2026), <https://web.archive.org/web/20251109040601/https://www.utc.wa.gov/regulated-industries/utilities/energy/resource-adequacy-washington-state> (showing website as of November 9, 2025); UTC Resource Adequacy Meeting 11-04-2025, YouTube (last visited Jan. 28, 2026), <https://www.youtube.com/watch?v=Ui5BW9RsFTU> (containing a recording of the Washington Agencies’ November 4, 2025 meeting and showing that the recording was posted on December 4, 2025); *see also* Resource Adequacy in Washington State, Wash. Utils. & Transp. Comm’n, <https://www.utc.wa.gov/regulated-industries/utilities/energy/resource-adequacy-washington-state> (last visited Jan. 28, 2026) (collecting materials). As the Washington Agencies explained in a letter to Governor Bob Ferguson, “[w]inter reliability assessments, presented by regional resource adequacy experts, [NERC] and [WECC], indicate the Northwest’s electric grid meets national resource adequacy criteria under normal conditions this winter.” Ex. 1-155 at PDF 17 (Washington Agencies Resource Adequacy Meeting Summaries (Compiled)). Moreover, the agencies explain that an elevated risk of short-duration outages in extreme weather occurs “absent additional measures, such as utilities following their emergency policies and procedures or firing up their backup generators.” *Id.* In plain language, the Washington Agencies suggest that key actors do not believe an emergency exists: “The Bonneville Power Administration and Washington utilities do not forecast outages this winter.” *Id.* The Department’s failure to address the November 4, 2025 meeting and associated materials is another reason its Order is unreasoned and not based on substantial evidence.

The Washington Department of Commerce also reported to the state legislature on utilities’ 2024 Integrated Resource Plans. Ex. 1-156 at 4 (Wash. Dep’t of Commerce Summary of Utilities’ 2024 IRPs (Dec. 1, 2025)). That report, released four weeks before the Order, explains that “[a]ssessments of resource adequacy from regional experts conclude the Northwest has adequate resources to meet current demand for electricity and does not face a significant risk of outages in the near term.” *Id.* at 5.

The Department also fails to address Bonneville’s resource adequacy assessment in its “White Book.” Ex. 1-142 (2025 Bonneville “White Book”). Bonneville projects that the Pacific Northwest has an energy surplus from August 1, 2025, through July 31, 2027, assuming the availability of market purchases and resources from independent power producers. *Id.* at 32; *see* Ex. 1-01 at app’x A at 24 (Current Energy Group Report). In fact, Bonneville projected (based on a netting of its generating resources and power supply obligations) an energy surplus for the Pacific Northwest region in both 2026 and 2027 even under assumptions that water supplies for hydro facilities are in the bottom 10% of conditions (which is not reflective of actual expectations in 2026), and that wind power performs at its lowest historical level

every year. Ex. 1-142 at 7–8, 31 (2025 Bonneville “White Book”). And under median operating conditions, Bonneville projected surpluses through the end of 2032. *Id.* In short, Bonneville has not provided any reason in its recent assessments to be concerned about the adequacy of the region’s supply in the near term.

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

The Order determines that, to best meet the claimed emergency and serve the public interest, “Tri-State and the co-owners[] shall take all measures necessary to ensure that Craig Unit 1 is available to operate at the direction of either Western Area Power Administration . . . in its role as Balancing Authority or the Southwest Power Pool (SPP) West in its role as the Reliability Coordinator, as applicable.” Order at 3. But the Order provides no rational basis for that determination. There are at least two types of problems with the Order. First, the Order does not address Craig’s shortcomings. These shortcomings include Craig’s unreliability and technical capabilities. The Order does not explain how, considering the plant’s unreliability and technical capabilities, Craig could meet the claimed emergency. Second, the Order does not discuss any alternatives to Craig for meeting the claimed emergency and ignores readily available and obvious alternatives that better address the claimed emergency. As a result, the Order is unreasoned and not based on substantial evidence.

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.¹¹

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 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. 5 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

¹¹ 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.

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 Order Fails to Address Craig’s Shortcomings.*

The Order fails to address the reasons that Craig is a poor fit to meet the claimed emergency. Craig is unreliable, and that unreliability hinders the plant from addressing the claimed emergency and actually poses risks to the grid. Moreover, Craig’s technical capabilities are a mismatch to meet the claimed emergency.

The Order recognizes—without offering any evidence—significant shortcomings and weaknesses of “coal-fired facilit[ies].” Order at 1 n.5.¹² But the Order then stops short. It fails to engage in reasoned decision-making regarding how, given these shortcomings and weaknesses, the Department views Craig to be the best means to meet the claimed emergency.

To begin, at the time of issuing the Order, Craig had a forced outage due to a mechanical failure. Ex. 1-06 (Tri-State December 2025 Press Release). The notion that a broken plant can meet the claimed emergency is facially unreasoned, and the Order presents no supporting rationale.

Craig’s unavailability is part of an alarming trend. From 2016 to 2020, Craig’s forced outage rate was below 6%. Ex. 1-03 at 8 (Powers Decl.). Then, between 2022 and 2023, Craig’s forced outage rate jumped from 1.75% to 9.53%. *Id.* A 9.53% forced outage rate translates to 835 hours that Craig could not operate in 2023. That means Craig was unavailable for approximately five weeks of the year, on top of any non-forced outages (such as planned outages taken for servicing the plant). *See id.*

Craig’s unavailability and unreliability are likely to worsen beyond 2025. Tri-State—Craig’s operator—has slowed capital expenditures and maintenance at Craig. Tri-State “proactively works to reduce and eliminate capital expenses” for retiring plants. *Id.* at 6 (discussing Ex. 1-51 at 187 (Tri-State 2020 ERP)). Tri-State’s filings

¹² To be sure, the Order does not offer any evidence for the premises in footnote 5. The footnote’s conclusion—continuous operation is required so long as the Secretary determines a shortage exists and is likely to persist—is unreasoned and is not based on any substantial evidence in the footnote or the Order.

with the Colorado Commission memorialize this approach for Craig. In 2023, Tri-State witness Insgold testified that its “investments in [the Craig Plant] are being appropriately limited to only actions necessary for ensuring safe operations and regulatory compliance, given the impending retirement of these units.” Ex. 1-50 at 10 (Insgold 2023 ERP Direct Testimony). Mr. Insgold’s testimony reflects Tri-State’s consistent and strategic decision to decrease capital expenditures and maintenance at retiring coal plants like Craig. *Id.* As a result, Tri-State did not undertake projects that it likely believed were necessary for reliable operation past the planned retirement date. Ex. 1-03 at 6–7 (Powers Decl.). Consequently, it is unlikely that Craig can be depended upon to operate reliably beyond December 2025. *Id.* at 5–6, 8 (Powers Decl.). “Craig 1 will be especially unreliable if the plant is required to run for extended periods of time, is required to stop and start numerous times, or attempts to start up at an accelerated rate in response to extreme demand conditions.” *Id.* at 5; *see also* Ex. 1-26 at 59 (NERC 2024 Reliability Report) (“[R]educed investment in maintenance and abnormal cycling that are being adopted primarily in response to rapid changes in the resource mix are negatively impacting baseload coal unit performance.”).

The Order also fails to address the dangers to grid reliability that it creates. An unreliable coal plant like Craig is likely to cause grid disturbances and the “loss of power to homes, and businesses in the areas that may be affected by curtailments or power outages.” Order at 3.

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*.

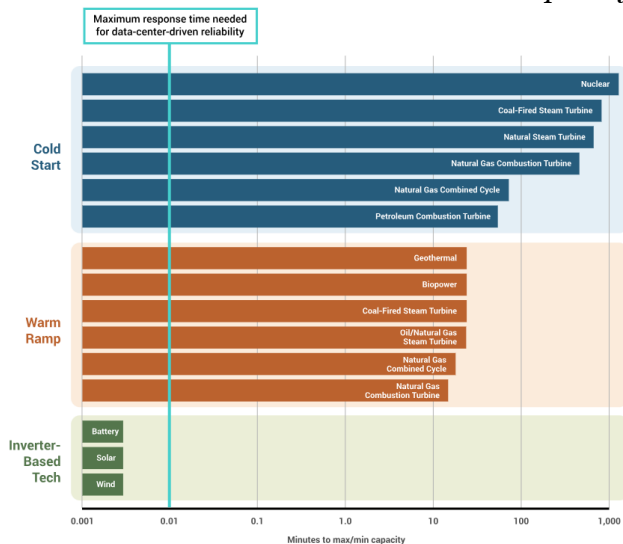
Ex. 1-44 at PDF 2–3 (RMI Analysis of Coal Plants’ Threats to Reliability).

The Department avers that it is concerned with reliability, *see* Order at *passim*, yet puts forward no analysis to address the likelihood that it is actually creating the (otherwise unproven) problem it is supposedly trying to address. This ostrich-like approach to record evidence and public evidence 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).

Additionally, the Order provides no reasoned basis to conclude that Craig can meet the emergency given its technical capabilities. Craig is not designed to turn on quickly in response to times of extreme demand. Coal units like Craig usually require at least 12 hours to reach full load operation from a cold condition. Ex. 1-03 at 8–9 (Powers Decl.); Ex. 1-33 at 26 (IEA Flexibility Report); Ex. 1-44 (RMI Analysis of Coal Plants’ Threats to Reliability); *see also supra* sec. IV.B.3.ii. Meanwhile, “utility-scale battery storage can dispatch from a cold start to full power in a matter of seconds.” Ex. 1-03 at 9 (Powers Decl.).

The Order suggests that projections of demand growth, including from “data centers driving artificial intelligence,” justify the continued operation of Craig. Order at 3. 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. 1-44 at PDF 3 (RMI Analysis of Coal Plants’ Threats to Reliability); *see also* Ex. 1-45 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”); *see also* Ex. 1-32 at 16 (NARUC Coal Report) (discussing typical coal plants’ startup and cycling costs); Ex. 1-33 at 26 (IEA Flexibility Report) (discussing coal plant start-ups). “[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. 1-44 at PDF 3 (RMI Analysis of Coal Plants’ Threats to Reliability) (relying on NERC).

Figure 20: Minutes Needed for a Power Plant to Reach Max/Min Capacity



Source: Ex. 1-44 at PDF 3 (RMI Analysis of Coal Plants’ Threats to Reliability).

In short, the Order fails to examine the inherent mismatch between the problem it diagnoses and the mandate it imposes. Thus, the Order does not reflect reasoned decision-making.

Additionally, the Order provides no reasoned basis for determining that Craig best meets the claimed emergency that may arise years into the future (which, again, the Department does not have authority to address under section 202(c)). Transmission and myriad other facilities are available alternatives over the multi-year span addressed by the Order. And the Order fails to identify a resource shortfall that is imminent and specific enough to identify any best-placed resource; the Order is unreasoned in failing to address how Craig is capable of meeting the generalized, uncertain claimed emergency. *See, e.g., supra* sec. V.A.3.i; Ex. 1-02 at 10 (Grid Strategies Resource Adequacy Report). Additionally, the Order, like the Department's Section 202(c) orders to other plants, causes economic damage by, *inter alia*, crowding out otherwise competitive resources, disrupting planning, and creating policy-driven uncertainty. *See* Ex. 1-46 at PDF 2–3 (R Street Institute Commentary: DOE “Zombies” Are Eating Competitive Power Markets); Ex. 1-01 at 4 (Current Energy Group Report) (“The [reviewed] studies do not support a proposition that extraordinary federal interventions into established processes are necessary to address the challenges in the latter part of the decade. Rather, federal intervention sends mixed and counterproductive signals to the market that undermine existing planning and procurement practices.”). Additionally, Craig's operations cause significant environmental harm, a factor the Department does not evaluate in reflexively selecting Craig to meet its (unproven) emergency. For all these reasons, too, the Order is without support in the record and unreasoned.

3. The Order Fails to Address or Reflect Consideration of Alternatives.

Other alternatives are available that meet the claimed emergency. The Department's failure to consider these alternatives is unreasoned and further shows that the Order is based on insubstantial evidence.

Hydropower, battery storage, demand response, and combustion gas turbines are all better suited to addressing rapidly varying, peak demand conditions. Ex. 1-03 at 9, 15 (Powers Decl.). As previously explained, *supra* sec. V.A.3.iii, Colorado utilities have collectively built thousands of megawatts of new resources that are now online and provide generating capacity. For example, in 2026, Tri-State will have at its disposal a total of 717 MW of gas and oil-fired generation, 516 MW of hydropower, and 134 MW of demand response to address fast-changing demand on its system. Ex. 1-89 at 10 (Tri-State 2025 ERP Annual Progress Report). Further, Tri-State will have surplus capacity from 2026 through 2034, even without Craig. *Id.* But the Order fails to address—or even mention—these other readily available alternatives.

The Order also fails to address imports to the WECC Northwest assessment area as an alternative to Craig to meet the purported emergency. The WECC Northwest

assessment area has access to significant import capability. *See, e.g.*, Ex. 1-01 at 12–13 (Current Energy Group Report); Ex. 1-02 at 6–7 (Grid Strategies Resource Adequacy Report); Ex. 1-158 at 6, 9, 22 (Sylvan & GridLab Independent Evaluation of E3 Presentation).

Section 202(c) specifically identifies “delivery, interchange, or transmission of electric energy” as among the alternatives available to meet a claimed emergency. 16 U.S.C. § 824a(c)(1). And the Department’s regulations provide for consideration of available resources, including power transfers. 10 C.F.R. §§ 205.373(f), 205.375.

Further, 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. 39984, 39984–86 (Aug. 6, 1981). Recent history demonstrates the important role of transmission connectivity along with imports and exports. *See, e.g.*, Ex. 1-30 at 64 (Winter Storm Elliott System Operations Inquiry) (“Despite tightening conditions on the MISO system . . . MISO maintained steadily increasing exports to TVA throughout the day.”); Ex. 1-31 at 43, 83–84 (PJM Elliott Report) (describing PJM exports); *see also* Ex. 1-15 at PDF 2 (DOE Order No. 202-02-1) (providing for usage of interregional transmission). According to NERC, starting in summer 2029, “imports may be necessary if new resources were to be significantly delayed.” Ex. 1-07 at 128 (NERC 2024 Long-Term Reliability Assessment). The Department offers no reasonable basis to question the availability of resources from neighboring regions. But even if there were barriers to transmission from those regions, the Department has not (and likely could not) explain why the Order provides 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).¹³

In fact, the first three weeks of the Order’s duration prove that other alternatives can meet the (unreasoned, unsubstantial, and unlawful) claimed emergency. Craig broke and went out of service on December 19, 2025, almost two weeks before the Order issued, and stayed that way until January 20, 2026. *See* Ex. 1-166 at 1 (Tri-State January 2026 Press Release); Ex. 1-06 (Tri-State December 2025 Press Release). There is no evidence of an increase in adverse resource adequacy or reliability events during that time period. Supply and demand were balanced by

¹³ The Department must also incorporate demand-side resources as a condition precedent to, or an alternative to, circumstances calling for generation by a polluting resource like Craig (and in determining whether an emergency exists), a requirement consistent with Departmental practice. *See* 16 U.S.C. § 824a(c)(1)–(2); 10 C.F.R. § 205.375; *e.g.*, Ex. 1-16 at 3 (DOE Order No. 202-20-2); Ex. 1-17 at 4–5 (DOE Order No. 202-22-2); Ex. 1-18 at 2–3 (DOE Order No. 202-21-1).

alternatives to Craig. The Department must consider the proven alternatives to reach a reasoned decision based on substantial evidence.

C. The Order Exceeds Other Limits on the Department's Authority.

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

In directing the Craig Co-Owners to take “all measures” to ensure that Craig is “available to operate,” Order at 3, 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 Order would encompass physical and all other changes necessary to revive a 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 Order is 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. Marsteller*, 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, even 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 reserved to 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.” 16 U.S.C. § 824a(c)(1). Nowhere does the statute empower the Department to order “all” steps that may be needed to ensure Craig’s availability, which could include repairs or modifications to physical facilities and other measures going far beyond electric power generation. Because the plant is at the end of its useful life, with years of forgone maintenance and capital expenditures, rendering it capable of meeting a short-term supply shortfall could essentially require rebuilding significant parts of the plant. On its face, the Department’s Order is *ultra vires*. The Order also contravenes the Federal Power Act’s repeated direction to respect the states’ authority over generating facilities, which includes the authority that Colorado exercised in providing and planning for Craig’s closure. *See, e.g.*, COLO. REV. STAT. §§ 40-2-125.5 (requiring retail utilities to submit joint electric resource and clean energy plans for Colorado Commission approval), 40-2-137 (allowing investor-owned utilities to submit resource portfolios that retire existing electric generating facilities), 40-2-134 (requiring wholesale electric cooperatives to submit electric resource plans for Colorado Commission approval); *see also* 4 COLO. CODE REGS. 723-3:3600–723-3:3619; 40 C.F.R. § 51.308 (providing states’ requirements and authority under the regional haze program). The Order, therefore, is unlawful and should be withdrawn.¹⁴

2. The Department’s Capacity Decree Is Not the Product of Reasoned Decision-Making and Beyond the Department’s Authority.

The Order includes a cryptic statement that further undermines its legality. It decrees that, “[b]ecause this order is predicated on the shortage of facilities for generation of electric energy and other causes, Craig Unit 1 shall not be considered a capacity resource.” Order at 4. The Order provides no further explanation of the import of this direction.

The statement is not the product of reasoned decision-making. The Order does not indicate what “capacity resource” means in this context and who is governed by this direction and toward what end. The Order also fails to tie this direction to the purported emergency underlying the Order. Nor does the Order articulate any rational connection between this direction and the Department’s limited authority to

¹⁴ 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).

“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).

To the extent this direction is meant to govern ratemaking matters, it is beyond the Department’s authority under Section 202(c). 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 some authorities of the Federal Power Commission to the Department, except as provided in 42 U.S.C. 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).

Additionally, to the extent the decree is directed to state and local officials, the Order violates the Tenth Amendment by commandeering state and local officials to implement a federal program. *See, e.g., Printz v. United States*, 521 U.S. 898, 933 (1997).

D. The Order Fails 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.* 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.*

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.¹⁵

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.

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 state environmental laws and environmental harms flowing from a Section 202(c) order.

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

Here, the Department implicitly acknowledges the possible conflict. The Order is limited to a 90-day duration. Order at 3–4. That temporal limitation exists for a

¹⁵ 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).

Section 202(c) order that may result in a conflict with environmental requirements. 16 U.S.C. § 824a(c)(4). And in imposing the 90-day duration, the Department relies on the statutory limitation for an order that may result in a conflict with environmental requirements. Order at 3.

Here, the evidence shows that the Order results in an actual conflict with state and federal environmental regulations: the provision in Colorado’s federally-approved Clean Air Act State Implementation Plan (“SIP”) that requires Craig to close on or before December 31, 2025. 83 Fed. Reg. 31332 (July 5, 2018) (approving Colorado’s SIP revision establishing Craig’s closure date); Ex. 1-65 at 183 at § F.VI.D.1 (CDPHE Regulation No. 3) (Colorado Regulation No. 3 provision regarding Craig’s closure, which EPA approved). This SIP provision addresses Colorado’s legal obligations under the Clean Air Act’s regional haze program, which Congress created to combat the negative effects of air pollution on visibility and treasured scenic vistas in federal “Class I” areas (i.e., listed national parks and wilderness areas). *See generally* 42 U.S.C. § 7491. Congress determined that these areas should enjoy the highest level of air quality and set a national goal of eliminating all human-caused visibility impairment. *Id.* §§ 7491(a)(1); 7472(a). Under the Clean Air Act and EPA’s Regional Haze Rule, states must periodically revise their SIPs to continue making progress toward Congress’s national visibility goal. *Id.* § 7491(b)(2); 40 C.F.R. § 51.308(b), (f), (g). Once EPA approves a state’s SIP, it becomes enforceable under federal law. 42 U.S.C. § 7413(a)(1)–(2).

In developing its SIP for the regional haze first implementation period, Colorado determined that air pollution from the Craig Plant contributes to visibility impairment in several Colorado Class I areas, including (among others) Rocky Mountain National Park, Flat Tops Wilderness Area, Eagles Nest Wilderness Area, Mount Zirkel Wilderness Area, and Rawah Wilderness Area. Ex. 1-03 at 11 (Powers Decl.); Ex. 1-71 at 47–48 (BART CALPUFF). These areas are shown in Figure 21 below.

Figure 21: Map of Colorado Class I Areas Affected by Visibility Impairment



Source: Google Earth.

Colorado revised its air pollution control regulations and submitted a SIP revision to EPA in 2017, which established two compliance pathways for Craig: (1) closure by December 31, 2025; or (2) conversion to natural gas-firing by August 31, 2023, coupled with more stringent NO_x emission limits. 83 Fed. Reg. 31332. EPA approved the SIP revision, thereby incorporating by reference the compliance requirements for Craig into the Code of Federal Regulations. *Id.* at 31333. The owners of Craig elected to close the facility by December 31, 2025, and have not converted it to natural gas-firing. The closure deadline is also contained in Craig's air permit. Ex. 1-73 at 23 (Craig Station Operating Permit) (condition 1.10.1 of Craig air permit). Therefore, the Order's mandate for Craig to continue operating beyond December 31, 2025 directly conflicts with state and federal environmental regulations.

In addition to flouting Craig's enforceable closure deadline, the Order may result in a conflict with other environmental requirements. Craig's air permit contains emission limits for NO_x, PM, and SO₂, pollutants that harm human health and contribute to haze formation. Ex. 1-03 at 11 (Powers Decl.); Ex. 1-73 (Craig Station Operating Permit) (sec. II of Craig air permit). The facility operates pollution control equipment to achieve compliance with those limits: ultra-low NO_x burners with overfire air for NO_x control; wet limestone scrubbers for SO₂ control; and pulse jet fabric filters (baghouse) for PM control. Ex. 1-03 at 11 (Powers Decl.). The air permit requires the facility to properly maintain and operate pollution control equipment to achieve compliance with emission limits and to minimize air pollution from the facility. *Id.* at 13. Failure to install, maintain, and operate these air pollution controls in a satisfactory manner can increase emissions, creating a risk that the facility will violate its emission limits. *Id.* at 9, 13–14. For example, over time, fly ash erodes and plugs the bags used in pulse jet fabric filters, causing the bags to degrade and potentially to rupture. *Id.* at 14. Regular bag replacement is necessary for satisfactory performance. *Id.* Similarly, wet limestone scrubbers often suffer from scale formation,

poor utilization of reagent, and inadequate spray nozzle efficiency. *Id.* And ultra-low NO_x burners can be degraded by erosion at the burner tip and wear in the coal pulverizers, requiring regular maintenance to minimize NO_x in the boiler. *Id.* There is no information in the public record indicating that the pollution control equipment at Craig has been maintained in a manner that would support operational integrity beyond the facility's planned closure date. *Id.* at 14–15. Therefore, it cannot be assumed that Craig's pollution control equipment is in good working order and will operate reliably to control the facility's air emissions beyond December 2025. *Id.* at 15.

3. *The Order Lacks the Conditions Required by Section 202(c).*

i. *The Order's Terms Must Be Clarified; Alternatively, Its Terms Fail to Require Generation Only During Hours Necessary to Meet the Purported Emergency.*

The Order instructs the Craig Co-Owners to ensure Craig is available to operate at the direction of either of two entities, Western Area Power Administration or SPP West. The Order's instruction must be clarified.

The law requires the Department to “ensure” that it “requires generation . . . only during hours necessary to meet the emergency and serve the public interest.” 16 U.S.C. § 824a(c)(2). And the emergency nominally described by the Order is “the loss of power to homes, and businesses in the areas that may be affected by curtailments or power outages.” Order at 3. Thus, Craig may be compelled to operate only when it is necessary to address an actual risk of a “loss of power to homes, and businesses.” *Id.*

This also means that the Department must clarify that Western Area Power Administration or SPP West may direct the Craig Co-Owners to generate electric energy from Craig only as necessary to address a “loss of power to homes, and businesses” that would occur absent Craig's generation. Public Interest Organizations move the Department to provide that clarification. 18 C.F.R. § 385.212; Ex. 1-12 at PDF 2 (DOE 202(c) Webpage) (providing that “[a]ll . . . requests related to FPA section 202(c) should be sent via email to AskCR@hq.doe.gov”).

Without the necessary clarification requested above, the Order's terms fail to ensure that Craig does not generate electric energy when other resources are available to prevent the claimed emergency, placing the Department in breach of its obligation to “ensure” that it “requires generation . . . only during hours necessary to

meet the emergency and serve the public interest.”¹⁶ 16 U.S.C. § 824a(c)(2). This is because the Order fails to provide *any* limitations on when generation from Craig is required. The absence of such limitations differentiates the Order from Section 202(c) orders issued before 2025, *see, e.g.*, Ex. 1-14 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), and even certain orders issued by this Department after the Craig Order, *see* Ex. 1-21 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. 1-22 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. 1-23 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.”). And the Order’s further instructions—limiting “operation of Craig Unit 1 to the times and within the parameters established in paragraph A,” Order at 4—do not provide the necessary limitation either; they simply repeat that initial instruction without any further limitation.¹⁷

ii. The Order Fails to Ensure Maximum Practicable Consistency with Environmental Rules and to Minimize Adverse Environmental Impacts.

The Order further fails to “ensure” that Craig operates, “to the maximum extent practicable,” consistent with applicable environmental rules. Order at 4; 16 U.S.C. § 824a(c)(2). The Order paraphrases the statutory text—that “operations of Craig Unit 1 must comply with applicable environmental requirements . . . to the maximum extent feasible,” but fails to specify *who* bears that responsibility or *what* such operation entails. Order at 4. It imposes no further conditions beyond stating that the Order provides no 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 Order provides no basis for the

¹⁶ Absent the necessary clarification, the Order also risks further increasing the cost to comply with the Order. *Cf.* Ex. 1-04 (Grid Strategies Costs Report) (estimating that the 90-day costs for Craig to operate at its average output from 2022 through 2024 is \$20.9 Million).

¹⁷ 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).

Department, or anyone else, to determine whether the plant is in fact complying or who might face the consequences of any failure to do so. *Cf.* Ex. 1-13 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 met requirement to comply with environmental requirements to maximum extent feasible). As such, the Order does 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 direction as to the plant’s operations, rather than merely parroting the statutory text. 16 U.S.C. § 824a(c)(2) (emphasis added).

The most definitive way to maximize consistency with state and federal environmental laws and regulations would be to limit Craig’s generation to the as-needed basis discussed in the motion for clarification *supra* sec. V.D.3.i. That clarification would reduce air pollution that contributes to visibility impairment in Colorado Class I areas, a problem the closure of Craig was intended to address pursuant to the Clean Air Act’s regional haze requirements.

In addition, the Order fails 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 Order claims to minimize impacts by “limit[ing] operation of Craig Unit 1 to the times and within the parameters established” in the Order’s “Paragraph A.” Order at 4. But Paragraph A contains only a command that the Craig Co-Owners “take all measures necessary to ensure that Craig Unit 1 is available to operate” at the direction of the Western Area Power Administration or SPP West. *Id.* at 3.¹⁸ An instruction demanding availability has no rational relationship to a requirement to minimize environmental harm. And the Order includes 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. 1-14 at 9 (DOE Order No. 202-17-4 Summary of Findings) (permitting non-compliant operation only during specified hours, and requiring exhaustion of “all

¹⁸ To the extent the Order allows the Western Area Power Administration or SPP West 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 Order requires Tri-State to “ensure that Craig Unit 1 is available to operate,” Order at 3, a direction that is inconsistent with the statute’s requirements to minimize the plant’s adverse environmental impacts.

reasonably and practically available resources,” including demand response and identified behind-the-meter generation resources selected to minimize an increase in emissions); Ex. 1-13 at 7 (DOE Order No. 202-22-4) (requiring “reasonable measures to inform affected communities” of non-compliant operations).

The Order makes no attempt to minimize adverse environmental impacts. As stated above, the clearest way to minimize adverse environmental impacts would be to limit Craig’s generation to the as-needed basis discussed in the motion for clarification *supra* sec. V.D.3.i. Without that clarification, the Order allows Craig to emit air pollution during operations that are not needed to meet the Department’s claimed (and unsupported) emergency. Craig is a significant emitter of NO_x, PM, SO₂, and CO₂. Ex. 1-03 at 11-13 (Powers Decl.). That air pollution is likely to harm human health and the environment and to adversely affect air quality in the state’s widely visited national parks and wilderness areas. At a minimum, minimizing adverse environmental impacts would require verification of the good working order of Craig’s pollution control equipment, given Tri-State’s lack of investment in the unit in preparation for its intended closure. *Id.* at 13-15.

Moreover, 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. 1-24 at 5 (DOE Order No. 202-24-1) (requiring detailed data on emissions of pollutants). The Order here instead only requires “such additional information” as the Department, in the future, may (or may not) “request[] . . . from time to time.” Order at 4. That possibility of future, unspecified inquiry cannot satisfy the statute’s demand that the Department “ensure” that its Order minimizes environmental impacts. 16 U.S.C. § 824a(c)(2).

VI. REQUEST FOR STAY

Public Interest Organizations further move the Department for a stay of the Order until the conclusion of judicial review. 18 C.F.R. § 385.212.¹⁹ 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.*

¹⁹ 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. § 825l(c); 18 C.F.R. § 385.713(e).

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).

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 Order is appropriate.

A. Intervenor Will Suffer Irreparable Harm Without a Stay of the Order.

A stay is necessary to protect Public Interest Organizations, their members, and the public from harm from continued coal-fired power operations at Craig caused by the Department’s Order. As noted *supra* sec. IV.B.3.iii, Craig emits health- and environment-harming air pollutants like NO_x, PM, SO₂, and VOCs. In just three months, Craig could emit over one million pounds of NO_x, hundreds of thousands of pounds of SO₂, and thousands of pounds of PM. Ex. 1-03 at 12–13 (Powers Decl.). Air pollution from Craig is harmful to human health, and these harms would not occur if the plant shut down. *Id.* These air pollutants also contribute to visibility impairment at several national parks and wilderness areas in Colorado, including Rocky Mountain National Park, Flat Tops Wilderness Area, Eagles Nest Wilderness Area, Mount Zirkel Wilderness Area, and Rawah Wilderness Area. *See supra* sec. V.D.2. The health and environmental harms from this pollution flow directly from the Department’s Order and are actual, specific, and imminent, and can be deadly. *See, e.g.*, Ex. 1-121 at 2–3 (Mercury Mortality Risks of Coal); Ex. 1-123 at PDF 5–6 (EPA COBRA Health Effects Estimate); Ex. 1-160 at PDF 2–3 (Clean Air Task Force Toll from Coal).

Additionally, without a stay, the Order creates other injuries, too. It needlessly forces the Craig Co-Owners to divert attention and investment dollars away from their electric resource and clean energy plans, thereby denying Public Interest Organizations’ members the benefits of Colorado and other state energy policies designed to benefit them and the public. *See supra* sec. V.A.3.iii. In addition, in

forcing ratepayers to pay for the availability and generation of a coal-burning facility that the State, stakeholders, and operator want to close, the Department's Order jeopardizes the diversification of generating resources that the Department itself has said increases grid reliability and will inherently and unjustifiably add to ratepayer costs. Ex. 1-122 at PDF 2–3 (*Energy Reliability and Resilience*).

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, e.g., supra* sec. V.A. Furthermore, because the Craig Co-Owners have already planned for the plant's closure 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 Order. *See supra* sec. V.A.3.iii. 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 the Order and Given the Harm it Produces to the Broader Public.

There is no public interest served by the Order, and a stay will only benefit the public. First, the Order exceeds the Department's authority; it has provided no reasonable grounds to substantiate any near-term or imminent shortfall in electricity supply that would justify Craig'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 Order overrides Colorado's exercise of its "authority to choose [its] preferred mix of energy generation resources." *Citizens Action*, 125 F.4th at 239. By doing so, it unlawfully intrudes 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 Public Interest Organizations and their members—from the onerous costs and dangerous pollution produced by Craig's unnecessary operation and availability.

VII. CONCLUSION

For the reasons set forth above, the undersigned Public Interest Organizations respectfully request that the Department grant intervention in the proceedings over the Order; stay the Order; grant clarification of the Order; grant rehearing of the Order; rescind the Order (and any renewals of the Order); and allow Craig to retire.

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GLOSSARY OF TERMS

Shortened Term	Long Description
Department	Department of Energy or DOE
Order	Department of Energy Order No. 202-25-14
Colorado Commission	Colorado Public Utilities Commission
Craig	Craig Unit 1
Craig Co-Owners	The five co-owners of Craig Unit 1
Craig Plant	The entire Craig facility
EPA	United States Environmental Protection Agency
FERC	Federal Energy Regulatory Commission
NERC	North American Electric Reliability Corporation
Platte River	Platte River Power Authority
RTO	Regional Transmission Organization
SIP	Clean Air Act State Implementation Plan
SPP	Southwest Power Pool
Tri-State	Tri-State Generation and Transmission Association
WECC	Western Electricity Coordinating Council
Xcel	Public Service Company of Colorado or Xcel Energy

INDEX OF EXHIBITS

No.	Exhibit Name	Document Name	URL
1-01	Current Energy Group Report	Current Energy Group Report, <i>Resource Adequacy in the Mountain West</i> (Jan. 2026)	
1-02	Grid Strategies Resource Adequacy Report	Michael Goggin, Grid Strategies, <i>Craig Unit 1 is Not Needed for Electric Reliability</i> (Jan. 2026)	
1-03	Powers Decl.	Declaration of Bill Powers (Jan. 24, 2026)	
1-04	Grid Strategies Costs Report	Michael Goggin, Grid Strategies, <i>The Economic Cost of a DOE Mandate for the Craig Unit 1 Coal-Burning Generator to Continue Operating</i> (Dec. 2025)	
1-05	Telos Resource Adequacy Report	Telos Energy, <i>Resource Adequacy Planning in Colorado</i> (2025)	
1-06	Tri-State December 2025 Press Release	Tri-State, <i>U.S. DOE Orders Tri-State to keep Craig Generating Station Unit Operating for Next 90 days</i> (Dec. 31, 2025)	https://tristate.coop/us-doe-orders-tri-state-keep-craig-generating-station-unit-operating-next-90-days
1-07	NERC 2024 Long-Term Reliability Assessment	N. Am. Electric Reliability Corp., <i>2024 Long-Term Reliability Assessment</i> (July 11, 2025)	
1-08	NERC 2025-26 Winter Assessment	North American Electric Reliability Corp., <i>2025-2026 Winter Reliability Assessment</i> (Nov. 2025)	https://www.nerc.com/globalassets/our-work/assessments/nerc_wra_2025.pdf

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1-09	2024 Western Assessment of Resource Adequacy	WECC, <i>2024 Western Assessment of Resource Adequacy</i> (last visited Jan. 28, 2026)	https://feature.wecc.org/wara/
1-10	Cooke Email to Alle-Murphy	Email from Lot Cooke, DOE to Linda Alle-Murphy Re: Rehearing procedures for DOE Order No. 202-05-3 (Dec. 30, 2005)	https://www.energy.gov/oe/articles/question-and-answer-procedural-questions-application-rehearing-order-no-202-05-02?nrg_redirect=397676
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1-12	Department 202(c) Webpage	U.S. Dep't of Energy, <i>DOE's Use of Federal Power Act Emergency Authority</i> (last visited Jan. 28, 2026)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
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1-14	Department Order No. 202-17-4 Summary of Findings	U.S. Dep't of Energy, Summary of Findings DOE Order No. 202-17-4 (Sept. 14, 2017)	https://www.energy.gov/sites/default/files/2017/09/f36/Order%20202-17-4%20Summary%20of%20Findings.pdf
1-15	Department Order No. 202-02-1	U.S. Dep't of Energy, 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
1-16	Department Order No. 202-20-2	U.S. Dep't 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
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1-19	FERC Energy Primer	FERC, <i>Energy Primer: A Handbook of Energy Market Basics</i> (Dec. 2023) (excerpt).	https://www.ferc.gov/media/energy-primer-handbook-energy-market-basics
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1-21	Department Order No. 202-26-01	U.S. Dep't of Energy, Order No. 202-26-01 (Jan. 24, 2026)	https://www.energy.gov/documents/order-no-202-26-01-ercot
1-22	Department Order No. 202-26-01A	U.S. Dep't of Energy, Order No. 202-26-01A (Jan. 25, 2026)	https://www.energy.gov/documents/announced-order-no-202-26-01a
1-23	Department Order No. 202-26-03	U.S. Dep't of Energy, Order No. 202-26-03 (Jan. 25, 2026)	https://www.energy.gov/documents/order-no-202-26-03-iso-ne
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1-25	MISO LOLE Presentation	MISO, <i>LOLE 101: Probabilistic Analyses</i> (May 8, 2018)	https://cdn.misoenergy.org/LOLE%20101%20Training624875.pdf
1-26	NERC 2024 Reliability Report	NERC, <i>2024 State of Reliability</i> (June 2024)	

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1-27	NERC 2025 Summer Reliability Assessment	NERC, <i>2025 Summer Reliability Assessment</i> (May 2025)	https://www.nerc.com/globalassets/programs/rapa/ra/nerc_sra_2025.pdf
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1-28b	2019–24 NERC Summer Reliability Assessments	NERC, <i>Summer Reliability Assessments for 2019-2025</i> (compiled)	2019 Reliability Assessment: https://www.nerc.com/globalassets/programs/rapa/ra/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://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC%20SRA%202021.pdf 2022 Reliability Assessment: n/a 2023 Reliability Assessment: https://www.nerc.com/globalassets/programs/rapa/ra/nerc_sra_2023.pdf

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1-32	NARUC Coal Report	Phillip Graeter & Seth Schwartz, <i>Recent Changes to U.S. Coal Plant Operations and Current Compensation Practices</i> , Nat'l Assoc. of Regulatory Util. Commissioners (Jan. 2020) (excerpt)	https://www.osti.gov/servlets/purl/1869928
1-33	IEA Flexibility Report	Colin Henderson, <i>Increasing the Flexibility of Coal-Fired Power Plants</i> , International Energy Agency Clean Coal Centre (Sept. 2014) (excerpt)	https://usea.org/sites/default/files/092014_Increasing%20the%20flexibility%20of%20coal-fired%20power%20plants_ccc242.pdf
1-34	Secretary Wright's West Virginia Remarks	Charles Young, <i>Energy Secretary Chris Wright: Future of U.S. Coal is 'long and bright'</i> , West Virginia News (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
1-35	July Resource Adequacy Report	U.S. Dep't of Energy, <i>Resource Adequacy Report: Evaluating the Reliability and Security of the United States Grid</i> (July 2025)	https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%29.pdf
1-36	Energy Emergency EO	Exec. Order No. 14,156, 90 Fed. Reg. 8433, Declaring a National Energy Emergency (Jan. 29, 2025)	https://www.federalregister.gov/documents/2025/01/29/2025-02003/declaring-a-national-energy-emergency
1-37	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
1-38	NY Times Coal Article	Brad Plumer & Mira Rojanasakul, <i>Trump Signs Orders Aimed at Reviving a Struggling Coal Industry</i> , NY Times (Sept. 3, 2025)	https://www.nytimes.com/2025/04/08/climate/trump-order-coal-mining.html
1-39	DOE July 7 Press Release	U.S. Dep't of Energy, <i>Department of Energy Releases Report on Evaluating U.S. Grid Reliability and Security</i> (July 7, 2025)	https://www.energy.gov/articles/department-energy-releases-report-evaluating-us-grid-reliability-and-security

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1-40	PIOs' RFR of July Resource Adequacy Report	<i>Motion to Intervene and Request for Rehearing of Nat. Res. Def. Council, the Ecology Ctr., Envtl. Def. Fund, Envtl. Law and Pol'y Ctr., Pub. Citizen, Sierra Club, and Vote Solar, U.S. Dep't of Energy Resource Adequacy Report (Aug. 8, 2025)</i>	https://sustainableferc.org/wp-content/uploads/2025/08/2025-08-06_NRDC-et-al-Request-for-Rehearing-DOE-Resource-Adequacy-Report.pdf
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1-42	GridLab Report	Ric Oconnell, <i>GridLab Analysis: Department of Energy Resource Adequacy Report</i> , GridLab (July 11, 2025)	https://gridlab.org/gridlab-analysis-department-of-energy-resource-adequacy-report/
1-43	Duke University Rethinking Load Growth Study	Tyler H. Norris et al., <i>Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems</i> , Duke University Nicholas Institute for Energy, Environment & Sustainability (2025)	https://nicholasinstitute.duke.edu/sites/default/files/publications/rethinking-load-growth.pdf
1-44	RMI Analysis of Coal Plants' Threats to Reliability	Gabriella Tosado, Ashtin Massie & Joe Daniel, RMI, <i>Reality Check: We Have What's Needed to Reliably Power the Data Center Boom, and It's Not Coal Plants</i> (Aug. 12, 2025)	https://rmi.org/reality-check-we-have-whats-needed-to-reliably-power-the-data-center-boom-and-its-not-coal-plants/
1-45	Energy Innovation Report	Eric G. Gimon, <i>Dodging the Firm Fixation for Data Centers and the Grid</i> , Energy Innovation (Nov. 2025)	https://energyinnovation.org/wp-content/uploads/Dodging-the-Firm-Fixation-for-Data-Centers-and-the-Grid.pdf

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1-47	Palgrave Handbook	Manfred Hafner & Giacomo Luciana, <i>Palgrave Handbook of International Economics</i> , Palgrave Macmillan (2022) (excerpt)	https://link.springer.com/book/10.1007/978-3-030-86884-0
1-48	IEA Report	International Energy Agency, <i>The role of CCUS in low-carbon power systems</i> (July 17, 2020) (excerpt)	https://www.iea.org/reports/the-role-of-ccus-in-low-carbon-power-systems
1-49	Tri-State Revised 2020 ERP Assessment of Existing Resources	Tri-State, <i>ERP Assessment of Existing Resources</i> (Aug. 3, 2020)	
1-50	Insgold 2023 ERP Direct Testimony	Barry Insgold, <i>Direct Test., Rev. 1</i> (Dec. 1, 2023)	
1-51	Tri-State 2020 ERP	Tri-State, <i>2020 ERP</i> (Dec. 1, 2020)	
1-52	2023 Colorado Water Plan	Colo. Water Conservation Bd., <i>Colorado Water Plan</i> (2023)	
1-53	Colorado Sun Article	Brittany Peterson and Jennifer McDermott, <i>In Colorado town built on coal, some families are moving on, even as Trump tries to boost industry</i> (Dec. 8, 2025)	https://coloradosun.com/2025/12/08/colorado-coal-transition-jobs/
1-54	PacifiCorp FERC Form 1	PacifiCorp, <i>FERC Form 1</i> (April 14, 2025)	
1-55	Platte River Power Authority Coal Energy	Platte River Power Authority, <i>Coal Energy</i>	https://prpa.org/generation/coal/

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1-56	Xcel FERC Form 1	Public Service Company of Colorado, <i>FERC Form 1</i> (April 4, 2025)	
1-57	2018 SIP Element Adopted	Docket No. EPA-R08-OAR-2018-0015, Environmental Protection Agency, <i>SIP Element Adopted</i> (April 26, 2018)	
1-58	Lisa Tiffin 2020 ERP Direct Testimony	Colorado PUC Proceeding No. 20A-0528E, <i>Lisa Tiffin Direct Testimony</i> (December 1, 2020)	
1-59	Intertek Reliability Study	Intertek, <i>Update of Reliability and Cost Impacts of Flexible Generation on Fossil-fueled Generators</i> (May 12, 2020)	
1-60	SRP Power Generation Sources	Salt River Project, <i>SRP Power Generation Sources</i> (last visited Jan. 27, 2026)	https://www.srpnet.com/grid-water-management/grid-management/power-generation-stations
1-61	2023 ERP Phase II Modeling Assumptions	Colorado PUC Proceeding No. 23A-0585E, Phase II Implementation Report, Attachment B, <i>Modeling Assumptions</i> (April 11, 2025)	
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1-64	Tri-State SPP West Press Release	Tri-State, <i>Benefits of SPP RTO West participation highlighted in filing with Colorado PUC</i> (June 17, 2025)	https://tristate.coop/benefits-spp-rto-west-participation-highlighted-filing-colorado-puc
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1-81	Norman Kapala 2021 Consumers IRP Direct Testimony	Michigan PSC Case No. U-21090, <i>Revised Direct Testimony</i> of Norman J. Kapala (October 2021)	
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No.	Exhibit Name	Document Name	URL
1-85	Colorado Commission Decision No. C23-0437	Colorado PUC Proceeding No. 20A-0528E, <i>Decision No. C23-0437</i> (June 30, 2023)	
1-86	Tri-State 150-Day Implementation Report	Colorado PUC Proceeding No. 20A-0528E, <i>Tri-State's 150-Day Implementation Report</i> (2023)	
1-87	Tri-State 2023 ERP 120 Day Implementation Report	Colorado PUC Proceeding No. 23A-0585E, <i>Tri-State's 120-Day Implementation Report</i> (2025)	
1-88	Tri-State 2023 ERP Modeling Assumptions	Colorado PUC Proceeding No. 23A-0585E, Tri-State's Hearing Exhibit 101 LKT-1 - Attachment B - Public - <i>Modeling Assumptions</i> (2023)	
1-89	Tri-State 2025 ERP Annual Progress Report	Colorado PUC Proceeding No. 23A-0585E, <i>Tri-State's 2025 Annual Progress Report</i> (Dec. 1, 2025)	
1-90	Colorado Commission Decision No. C25-0612	Colorado PUC Proceeding No. 23A-0585E, <i>Decision No. C25-0612</i> (August 26, 2025)	
1-91	Platte River 2020 IRP	Platte River Power Authority, <i>2020 Integrated Resource Plan</i> (2020)	
1-92	Platte River 2024 IRP	Platte River Power Authority, <i>2024 Integrated Resource Plan</i> (2024)	
1-93	Xcel 2025 Near Term Procurement Report	Public Service Company of Colorado, <i>Near Term Procurement Report</i> (2025)	

No.	Exhibit Name	Document Name	URL
1-94	Xcel 2024 JTS, Volume 2 Technical Appendix	Colorado PUC Proceeding No. 24A-0442E, Hearing Exhibit 101, Attachment <i>JWI-2, Volume 2 - Technical Appendix, Rev. 2</i> (Oct. 15, 2024)	
1-95	Colorado Commission Decision No. C25-0892	Colorado PUC Proceeding No. 25V-0480E, <i>Decision No. C25-0892</i> (Dec. 10, 2025)	
1-96	Comanche Unit 2 Variance Petition	Colorado PUC Proceeding No. 25V-0480E, <i>Joint Petition</i> (2025)	
1-97	Colorado Commission Decision No. C25-0747	Colorado PUC Proceeding No. 24A-0442E, Decision No. C25-0747 (November 6, 2025)	
1-98	PacifiCorp 2023 IRP Update	PacifiCorp, <i>2023 Integrated Resource Plan Update</i> (2024)	
1-99	PacifiCorp 2025 IRP	PacifiCorp, <i>2025 Integrated Resource Plan, Volume I</i> (Mar. 31, 2025)	
1-100a	Salt River Project 2023 IRP	Salt River Project, <i>Integrated System Plan</i> (2023)	
1-100b	Salt River Project 2023 IRP	Salt River Project, <i>Integrated System Plan</i> (2023)	
1-101	Xcel Information Sheet on Colorado Energy Plan	Xcel, <i>Information Sheet on Colorado Energy Plan</i> (2019)	

No.	Exhibit Name	Document Name	URL
1-102	Colorado Commission Decision No. C24-0052	Colorado PUC Proceeding No.21A-0141E, <i>Decision No. C24-0052</i> (Jan. 23, 2024)	
1-103	2025 Xcel ERP Annual Progress Report	Xcel, Colorado PUC Proceeding No. 21A-0141E, <i>2021 Electric Resource Plan & Clean Energy Plan Annual Progress Report</i> (Mar. 31, 2025)	
1-104	PacifiCorp 2015 IRP Update	PacifiCorp, <i>Integrated Resource Plan Update</i> (2015)	
1-105	PacifiCorp 2025 IRP	PacifiCorp, <i>Integrated Resource Plan</i> (2025)	
1-106	EIA Annual 2024	EIA, <i>2024 EIA Annual</i> (2025)	
1-107	EIA Annual 2019	EIA, <i>2019 EIA Annual</i> (2021)	
1-108	UT Austin Article	University of Texas at Austin Energy Institute, <i>The History and Evolution of the US Electricity Industry</i> (2016)	https://energy.utexas.edu/sites/default/files/UTAustin_FCe_History_2016.pdf
1-109	PacifiCorp 2025 Oregon RFP	Oregon PUC Docket UM 2383, <i>PacifiCorp, PacifiCorp's Informational Filing</i> (2025)	
1-110	PacifiCorp 2024 URC RFP	PacifiCorp, <i>2024 Utah Renewable Communities Request for Proposals, "2024 URC RFP"</i> (2025)	

No.	Exhibit Name	Document Name	URL
1-111	Western Energy Imbalance Market Webpage	CAISO, <i>Western Energy Markets, Western Energy Imbalance Market</i> , (last visited Jan. 27, 2026)	https://www.westernenergymarkets.com/western-energy-imbalance-market-weim
1-112	WEIS Southwest Power Pool	SPP, <i>Western Energy Imbalance Service Market</i> , (last visited Jan. 27, 2026)	https://spp.org/western-services/weis/
1-113	Craig Station, AMD data 2020 through 2024	EPA, Enforcement and Compliance History Online, <i>Air Pollutant Report</i> , (last visited Jan. 27, 2026)	https://echo.epa.gov/air-pollutant-report?fid=110041086393
1-114	Tri-State Members	Tri-State Gen. & Transm. Ass'n, Inc., <i>What It Means To Be a Member</i> (last visited Jan. 19, 2026)	https://tristate.coop/members
1-115	Department Explainer on Balancing Authorities	Dep't of Energy, <i>How It Works: The Role of a Balancing Authority</i> (2022)	https://www.energy.gov/sites/default/files/2023-08/Balancing%20Authority%20Background%202022-Formatted 041723 508.pdf
1-116	EIA Explainer on Balancing Authorities	Sara Hoff, U.S. Energy Info. Admin., U.S. Dep't of Energy, <i>U.S. Electric System Is Made up of Interconnections and Balancing Authorities</i> (July 20, 2016)	https://www.eia.gov/todayinenergy/detail.php?id=27152
1-117	NERC Emergency Operations	N. Am. Elec. Reliab. Corp., <i>EOP-011-4 Emergency Operations</i> (last visited Jan. 19, 2026)	https://www.nerc.com/globalassets/standards/reliability-standards/eop/eop-011-4.pdf
1-118	Department Press Release on Centralia Order	U.S. Dep't of Energy, <i>Energy Secretary Ensures Washington Coal Plant Remains Open to Ensure Affordable, Reliable and Secure Power Heading into Winter</i> (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
1-119	2001 National Energy Policy	Nat'l Energy Pol'y Dev. Grp., <i>Reliable, Affordable, and Environmentally Sound Energy for America's Future</i> (May 16, 2001)	https://www.nrc.gov/docs/ml0428/ml042800056.pdf
1-120	Department Export Authorization EA-365-C (Oct. 21, 2025)	Research Power Corp., <i>Order No. EA-365-C</i> (Oct. 21, 2025)	https://www.energy.gov/gdo/ea-365-c-research-power-corporation
1-121	Mercury Mortality Risks of Coal	<i>Particulate Pollution from Coal Associated with Double the Risk of Mortality than PM2.5 from Other Sources</i> , Harvard T.H. Chan Sch. of Pub. Health (Nov. 23, 2023)	https://hsph.harvard.edu/news/particulate-pollution-from-coal-associated-with-double-the-risk-of-mortality-than-pm2-5-from-other-sources/
1-122	Energy Reliability and Resilience	U.S. Dep't of Energy, <i>Energy Reliability and Resilience</i> (webpage as of Oct. 21, 2025)	https://web.archive.org/web/20251021071021/https://www.energy.gov/eere/energy-reliability-and-resilience
1-123	EPA COBRA Health Effects Estimate	Envtl. Prot. Agency, <i>COBRA Web Edition</i> (last visited Jan. 22, 2025)	Go to https://cobra.epa.gov/ . In Step 1.A, select Colorado and "Moffat" county. In Step 1.B, select "Fuel Combustion: Industrial." In Step 1.C, input reduce SO2 by 335.43 tons and reduce NOx by 2,211.57 tons (based on Craig-specific data for annual emissions from 2024, available at https://campd.epa.gov/data/custom-data-download). In Step 1.C, also input reduce PM2.5 by 13 tons (based on Craig-specific 2020 National Emissions Inventory ("NEI") data for annual PM2.5 Filterable emissions, scaled by the ratio of Craig's 2024 SO2 and NOx emissions to their 2020 NEI SO2 and NOx emissions. NEI 2020 data is available at https://www.epa.gov/air-emissions-inventories/2020-national-emissions-inventory-nei-data). Use a 2% discount rate and run scenario.

No.	Exhibit Name	Document Name	URL
1-124	2025 PacifiCorp Fact Sheet	PacifiCorp, “Just the Facts” (2025)	https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/about/PacifiCorp_Fact_Sheet.pdf
1-125	Service Area and Territory (Electric Power and Water) SRP	SRP, “Service Territory” (2025)	https://www.srpnet.com/about/service-area-territory
1-126	Xcel, List of Towns Receiving Electric Service in Colorado	Xcel, <i>Colorado Communities Served by Xcel Energy</i> (2024)	https://xcelnew.my.salesforce.com/sfc/p/#1U0000011ttV/a/8b000002Y8vy/cDTZ25fPv.NuR_sx_peANfpfaxL47xQXr7fhoTJZoOw
1-127	Who we serve - Platte River Power Authority	Platte River Power Authority, <i>Who We Serve</i> (last visited Jan. 26, 2026)	https://prpa.org/about-prpa/who-we-serve/
1-128	Order No. 24-073_OR PUC on Pac 2023 IRP	Oregon PUC Docket LC 82, Order No. 24-073 (Mar. 19, 2024)	
1-129	Utah PSC on Pac 2023 IRP	Utah PUC Docket No. 23-035-10, Order (April 17, 2024)	
1-130	Idaho PUC on Pac 2023 IRP	Idaho PUC Docket PAC-E-23-10, Order No. 35977 (Oct. 31, 2023)	
1-131	FERC Western Energy Markets Explainer	Office of Public Participation, FERC, <i>Western Energy Markets Explainer</i> (last visited Jan. 2, 2026)	https://ferc.gov/OPP/western-markets-explainer
1-132	Power Council Overview	Northwest Power and Conservation Council, <i>Overview</i> (last updated July 2025)	https://www.nwcouncil.org/fs/19572/2025overview.pdf

No.	Exhibit Name	Document Name	URL
1-133	Power Council 2021 Power Plan	Northwest Power and Conservation Council, <i>The 2021 Northwest Power Plan</i> (Mar. 10, 2022)	https://www.nwcouncil.org/fs/17680/2021powerplan_2022-3.pdf
1-134	Overview of Power Council's Resource Adequacy Approach	Northwest Power and Conservation Council, <i>Resource Adequacy</i> (last visited Jan. 12, 2025)	https://www.nwcouncil.org/energy/energy-topics/resource-adequacy/
1-135	Overview of Power Council's Approach to Load Forecasting	Northwest Power and Conservation Council, <i>Explaining How the Council Forecasts Load Growth for the Pacific Northwest Power System</i> (Mar. 20, 2025)	https://www.nwcouncil.org/news/2025/03/20/explaining-pacific-northwest-load-forecasting/
1-136	WECC Explainer	Western Elec. Coordinating Council, <i>WECC ODITY Threshold Interpretations</i> (Oct. 25, 2022)	https://www.wecc.org/sites/default/files/documents/program/2024/WECC%20On-e-day-in-ten-year%20metric%20explanation.pdf
1-137	Power Council 2029 Power Supply Adequacy Assessment	Northwest Power and Conservation Council, <i>Pacific Northwest Power Supply Adequacy Assessment for 2029</i> (Aug. 2024)	https://www.nwcouncil.org/fs/18853/2024-4.pdf
1-138	Bonneville 2024 Fact Sheet	Bonneville Power Administration, <i>BPA Facts</i> (Oct. 2025)	https://www.bpa.gov/-/media/Aep/about/publications/general-documents/bpa-facts.pdf
1-139	Bonneville Day-Ahead Market Policy	Bonneville Power Administration, <i>Day-Ahead Market Policy</i> (May 9, 2025)	https://www.bpa.gov/-/media/Aep/projects/day-ahead-market/20250509-dam-final-policy.pdf
1-140	2023 Bonneville "White Book"	Bonneville Power Admin., <i>2023 Pacific Northwest Loads and Resources Study</i> (Apr. 2023)	https://www.bpa.gov/-/media/Aep/power/resource-program/2023-white-book.pdf

No.	Exhibit Name	Document Name	URL
1-141a	2024 Bonneville “White Book”	Bonneville Power Admin., <i>2024 Pacific Northwest Loads and Resources Study</i> (Aug. 2024)	https://www.bpa.gov/-/media/Aep/power/white-book/2024-white-book.pdf
1-141b	2024 Bonneville “White Book”	Bonneville Power Admin., <i>2024 Pacific Northwest Loads and Resources Study</i> (Aug. 2024)	https://www.bpa.gov/-/media/Aep/power/white-book/2024-white-book.pdf
1-142	2025 Bonneville “White Book”	Bonneville Power Admin., <i>2025 Pacific Northwest Loads and Resources Study</i> (May 2025)	https://www.bpa.gov/-/media/Aep/power/white-book/2025-whitebook.pdf
1-143	Bonneville Resource Plan (compiled 2022 & 2024)	Bonneville Power Administration, <i>2022 Resource Program</i> (2022) Bonneville Power Administration, <i>2024 Resource Program</i> (2024)	2022 Resource Plan: https://www.bpa.gov/-/media/Aep/power/resource-program/2022-resource-program.pdf 2024 Resource Plan: https://www.bpa.gov/-/media/Aep/power/resource-program/2024-rp-document.pdf
1-144	Power Council 2024 Resource Program Results	Northwest Power and Conservation Council, <i>Bonneville’s 2024 Resource Program Results</i> (Jan. 7, 2025)	www.nwccouncil.org/fs/19031/2025_01_4.pdf
1-145	Western Pool Reserve Sharing Program	Western Power Pool, <i>Northwest Power Pool Reserve Sharing Program Documentation</i> (effective Oct. 1, 2025)	https://www.westernpowerpool.org/private-media/documents/NWPP_RSG_Program_Doc_-_RSGC_Approved_effective_10.1.2025.pdf
1-146	Western Frequency Response Sharing Group	Western Power Pool, <i>Western Frequency Response Sharing Group</i> (last visited Jan. 2, 2026)	https://www.westernpowerpool.org/about/programs/western-frequency-response-sharing-group
1-147	WRAP Tariff	Western Power Pool, <i>Western Resource Adequacy Program Tariff</i> (effective Mar. 16, 2025)	https://www.westernpowerpool.org/private-media/documents/WRAP_Tariff_Effective_3.16.25.pdf

No.	Exhibit Name	Document Name	URL
1-148	WRAP Notice	Rebecca Sexton, <i>WPP Notice to WRAP Resource Adequacy Participants Committee</i> , Western Power Pool (last modified Oct. 31, 2025)	https://www.westernpowerpool.org/news/wpp-notice-to-wrap-resource-adequacy-participants
1-149	“About WECC” Webpage	Western Elec. Coordinating Council, <i>About WECC</i> (last visited Jan. 2, 2026)	https://www.wecc.org/about/about-wecc
1-150	NERC Rules of Procedure	N. Am. Elec. Reliab. Corp., <i>Rules of Procedure</i> (effective Nov. 28, 2023)	https://www.nerc.com/globalassets/who-we-are/rules-of-procedure/nerc-rop-effective-20231128_with-appendicies.pdf
1-151	WECC Contingency Reserve Whitepaper	Western Elec. Coordinating Council, <i>WECC-0142 BAL-002-WECC-3 Contingency Reserve Request to Retire</i> (Jan. 21, 2025)	https://www.nerc.com/globalassets/standards/approved-standards/bal/bal-002-wecc-3-cont.-rev.-req.-to-retire---white-paper---final_09162025.pdf
1-152	WECC Risk Factor Criteria	Western Elec. Coordinating Council, <i>WECC Risk Factor Criteria for Inherent Risk Assessment</i> (effective Mar. 22, 2021)	https://www.wecc.org/sites/default/files/documents/program/2024/WECC%20Risk%20Factor%20Criteria%20for%20IRA.pdf
1-153	WECC Reliability Assessment Webpage	Western Elec. Coordinating Council, <i>Reliability Assessments</i> (last visited Jan. 2, 2026)	https://www.wecc.org/program-areas/reliability-planning-performance-analysis/reliability-assessments
1-154	Wash. Commerce Util. Res. Planning Report (Compiled 2022 & 2024)	Wash. Dept. of Commerce, Energy Policy Office, <i>Washington State Electric Utility Resource Planning, Report to the Legislature</i> (2022, 2024)	2022: https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Washington%20State%20Electric%20Utility%20Resource%20Planning%202022%20Report%20-%20FINAL_6eb6fc4a-487b-483b-b5ae-d622e9bd2a0b.pdf 2024: https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Washington%20State%20Electric%20Utility%20Resource%20Planning%202024%20Report_FINAL_2be3ab47-13c7-45fc-a113-808ee29dbc69.pdf

No.	Exhibit Name	Document Name	URL
1-155	Washington Agencies Resource Adequacy Meeting Summaries (Compiled)	Wash. Utils. & Transp. Comm’n. & Wash. Dep’t of Comm., <i>Letter to the Governor Re: Summary of the 2025 Long-Term Resource Adequacy Meeting</i> (Nov. 19, 2025) Wash. Utils. & Transp. Comm’n. & Wash. Dep’t of Comm., <i>Letter to the Governor Re: Summary of the 2025 Summer Resource Adequacy Meeting</i> (July 30, 2025) Wash. Utils. & Transp. Comm’n. & Wash. Dep’t of Comm., <i>Letter to the Governor Re: Summary of the 2025 Winter Preparedness Resource Adequacy Meeting</i> (Dec. 31, 2025)	Long Term RA Meeting: https://apiproxy.utc.wa.gov/cases/GetDocument?docID=121&year=2021&docketNumber=210096 Summer Readiness RA Meeting: https://apiproxy.utc.wa.gov/cases/GetDocument?docID=73&year=2021&docketNumber=210096 Winter Readiness RA Meeting: https://apiproxy.utc.wa.gov/cases/GetDocument?docID=125&year=2021&docketNumber=210096
1-156	Wash. Dep’t of Commerce Summary of Utilities’ 2024 IRPs (Dec. 1, 2025)	Aaron Tam et al., Washington State Dep’t of Commerce, <i>Washington State Electric Utility Resource Planning: 2024 Report</i> (version 4 published Dec. 1, 2025)	https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Washington%20State%20Electric%20Utility%20Resource%20Planning%202024%20Report_FINAL_2be3ab47-13c7-45fc-a113-808ee29dbc69.pdf OR Navigate to https://app.leg.wa.gov/reportstothellegislature and filter for Report Date of “12/1/2025,” Organization Name of “Commerce, Department of,” and RCW of “19.280,” then click link for Report Title of “Electric Utility Resource Planning, 2024 Report (843k)”
1-157	E3 Resource Adequacy Phase 1 Presentation	Arne Olson et. al., Energy and Env’tl. Economics, Inc., <i>Resource Adequacy and the Energy Transition in the Pacific Northwest: Phase 1 Results</i> (Sept. 22, 2025)	https://www.utc.wa.gov/sites/default/files/2025-10/Revised%20V3%20E3%20Presentation%20RA%20Study%20September%2022%20WA%20RA%20Meeting.pdf

No.	Exhibit Name	Document Name	URL
1-158	Sylvan & GridLab Independent Evaluation of E3 Presentation	Sylvan Energy Analytics & GridLab, <i>Near-Term Winter Resource Adequacy Challenges in the Pacific Northwest: A Review of E3's Northwest RA Study Phase 1 and Independent Evaluation of Near-Term Winter Challenges</i> (Jan. 2026)	https://gridlab.org/portfolio-item/pnw_nearterm_winterra/
1-159	Email Correspondence with E3	Email Thread Between Arne Olson, Energy and Env'tl. Economics, Inc., and Brad Cebulko, Current Energy Group, Re: E3 NW RA study and Centralia (Dec. 31, 2025 to Jan. 9, 2026)	
1-159a	E3's Attachment to Email Correspondence with E3	E3's Attachment (in PDF form) to Email Thread in Ex. 1-159	
1-159b	E3's Attachment to Email Correspondence with E3 (as transmitted in Excel form)	E3's Attachment (as transmitted in Excel form) to Email Thread in Ex. 1-159	
1-160	Clean Air Task Force Toll from Coal	Clean Air Task Force, <i>Toll from Coal</i> (last visited Jan. 23, 2025)	https://www.tollfromcoal.org/#/map/(title:6021/detail:6021/map:6021/CO)
1-161	SPP West Press Release	<i>Southwest Power Pool First RTO to Operate in Both Interconnections with Tariff Approval</i> (Mar. 20, 2025)	https://www.spp.org/news-list/spp-first-rto-to-operate-in-both-interconnections-with-tariff-approval/
1-162	EIA Generating Unit Annual Capital and Life Extension Costs Analysis	EIA, <i>Generating Unit Annual Capital and Life Extension Costs Analysis</i> (2019)	https://www.eia.gov/analysis/studies/powerplants/generationcost/pdf/full_report.pdf

No.	Exhibit Name	Document Name	URL
1-163	Trump Advisor Says Electricity Customers Pay for 202(c) Orders	Laura Sanicola, Barrons, <i>Who's Paying to Keep Coal Plant Alive? All Electricity Customers, Trump Advisor Says</i> (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
1-164	Colorado Commission Decision No. C24-0052	Colorado PUC Proceeding No. 21A-0141E, <i>Decision No. C24-0052</i> (2024)	
1-165	Colorado Commission Decision No. C25-0024	Colorado PUC Proceeding No. 21A-0141E, <i>Decision No. C25-0024</i> (2025)	
1-166	Tri-State January 2026 Press Release	Tri-State, <i>Tri-State Makes Craig Generating Station Unit 1 Available to Operate in Compliance with DOE Emergency Order</i> (Jan. 23, 2026)	https://tristate.coop/tri-state-makes-craig-generating-station-unit-1-available-operate-compliance-...
1-167	SPP Markets+ Website	SPP, <i>Markets+</i> (last visited Jan. 27, 2026)	https://www.spp.org/marketsplus
1-168	Tri-State Extreme Weather Event Modeling Assumptions	Colorado PUC Proceeding No. 23A-0585E, 2023 ERP Phase II Implementation Report, Attach. B-5, <i>Extreme Weather Event Modeling Assumptions</i>	

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-187
Department Order No. 202-22-2 Amendment No. 1



Department of Energy

Washington, DC 20585

Amendment Number 1 to Order No. 202-22-2

On September 4, 2022, because of a shortage of currently operational electric generating facilities, high demand for electricity, and other adverse conditions resulting from the extreme heat event in California, I issued Order No. 202-22-2. Order No. 202-22-2 authorized the Balancing Authority of Northern California (BANC) to direct the identified electric generating resource (Covered Resources) to operate in BANC's Balancing Authority Area (BAA), under specified conditions, to prevent or mitigate potential power disruptions and provide relief to the bulk power system during stressed grid conditions caused by extreme heat until September 8, 2022. Order No. 202-22-2 expires at the end of the day on September 8, 2022, by its own terms.

On September 7, 2022, BANC submitted a *Request for Extension and Limited Amendment of Emergency Order Pursuant to Section 202(c) of the Federal Power Act* (Renewal Application) to the Department. In its Renewal Application, BANC requests an extension of Order 202-22-1 through September 11, 2022 and certain modifications to the run time hour limitations contained in Order No. 202-22-2. On September 8, 2022, BANC filed a Revised Request for *Request for Extension and Limited Amendment of Emergency Order Pursuant to Section 202(c) of the Federal Power Act* in response to questions from DOE.

Emergency Situation

In its Renewal Application, BANC states that "the actual heat event has been more severe and records loads have been experienced." The emergency conditions brought about by the ongoing extreme heat event in California have continued and worsened and the supply of electricity is at increased risk for meeting system demand. As stated in its Renewal Application, BANC established a new record peak of approximately 4943 MW on September 6. BANC entered into an EEA-2 as of 1330 hours that same day. During this period BANC had forced outages of significant generation but was able to return units to service in approximately 90 minutes. It is believed that BANC members Roseville and Modesto exceeded their all-time peaks. Consequently, BANC requests the expiration date of Order No. 202-22-2 be extended through September 11, 2022.

In addition to the extension of Order No. 202-22-2, BANC has requested that the Order be modified to remove the 2 PM to 10 PM run time limitation so as to allow additional operational flexibility. BANC specifically requests that the Covered Resource be allowed to run during anytime that they have received notice of an Energy Emergency Alert Level 2 (EEA2) condition or greater. The practical impact of this will be to allow the Covered Resource more notice to follow their protocols for ramping up their diesel-fired generator units. In addition, BANC has requested the ramp down of the Covered Resource could extend beyond the period in which the EEA 2 condition exists. Specifically, the ramp down would commence at the time the EEA 2 condition is declared ended and should be completed as soon as possible consistent with good utility and operational

Consultation

In considering renewal or reissuance of an order under FPA section 202(c) that may conflict with an environmental law or regulation, DOE is required to “consult with the primary Federal agency with expertise in the environmental interest protected by such law or regulation” and to include “conditions as such Federal agency determines necessary . . . to the extent practicable.” 16 U.S.C. § 824a(c)(4). The Environmental Protection Agency (EPA) is the primary federal agency in this case with expertise in the protected environmental interest, specifically Title V of the Clean Air Act and the Department consulted with EPA after receiving the Renewal Application and EPA did not request any additional conditions be included in this Order. Email from Acting Assistant Administrator Larry Starfield, EPA Office of Enforcement and Compliance Assurance to Kathleen Hogan, Acting Under Secretary for Infrastructure for DOE, September 7, 2022.

Based on the information submitted to the Department, I have determined that an emergency continues to exist in California due to a shortage of electric energy. I find that the issuance of this Order will help to meet the emergency conditions and serve the public interest as required by FPA section 202(c).

ORDER

For the reasons set forth above, pursuant to Section 202(c) of the FPA, I hereby grant BANC’s Renewal Application and issue this Order, with modifications as explained below, to extend the expiration date of Order No. 202-22-2 through September 11, 2022.

1. Ordering Paragraph A appearing on page 4 of Order No. 202-22-2 is hereby deleted and replaced in its entirety by the following:
 - A. From September 8, 2022, to September 11, 2022, in the event that BANC determines that generation from the Covered Resource is necessary to preserve the reliability of the bulk electric power system in California, I direct BANC to dispatch such unit or units and to order their operation solely under the following conditions: the notification of an Energy Emergency Alert Level 2¹ condition or greater after exhausting all reasonably and practically available resources, together with such reasonable and limited time as is necessary for a Covered Resource to ramp down following an Energy Emergency Alert Level 2 or greater, consistent with good utility practice as directed by the BANC with the goal of limited operation outside of an Energy Emergency Alert Level 2 or greater to the greatest extent possible.

¹ For the purposes of this Order, “Energy Emergency Alert Level 2” has the meaning set forth in Section 3.6.3 of the California ISO System Emergency Operating Procedure, Procedure No. 4420, Version 14.0, Effective Date May 1, 2022 (CAISO Emergency Operating Procedure).

Department of Energy Amendment Number 1 to Order No. 202-22-2

2. The date September 8, 2022 where it appears in Ordering Paragraphs D and H of Order No. 202-22-2 is hereby replaced by the date September 11, 2022.
3. All other terms of Order No. 202-22-2 remain the same and in effect, including Ordering Paragraphs A-H, except as modified herein.
4. This Amendment Number 1 to Order No. 202-22-2 shall be effective upon its issuance, and shall expire at 23:59 Pacific Time on September 11, 2022.

Issued in Washington, D.C. at 16:38 Eastern Time on this 8th day of September, 2022.



Kathleen Hogan
Acting Under Secretary for
Infrastructure

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-188
Department Order No. 202-22-1 Amendment No. 2



Department of Energy
Washington, DC 20585

Amendment Number 2 to Order No. 202-22-1

On September 2, 2022, because of a shortage of currently operational electric generating facilities, high demand for electricity, and other adverse conditions resulting from the extreme heat event in California, I issued Order No. 202-22-1. Order No. 202-22-1 authorizes the California Independent System Operator Corporation (CAISO), to direct the operation of the Covered Resources identified in Order No. 202-22-1 and on the terms set forth therein. On September 7, 2022, because of the continuing shortage of electric energy and the need for continued operation of the two units at Calpine's Greenleaf Unit 1 site in Yuba City, California (Greenleaf Units), I issued Amendment No. 1 to Order No. 202-22-1. Amendment No. 1 to Order No. 202-22-1 added the Greenleaf Units as Covered Resources subject to the terms of Order No. 202-22-1, except that the Greenleaf Units may be operated through September 9, 2022. By its terms, Order No. 202-22-1 as amended by Amendment No. 1 expires at the end of the day on September 8, 2022 with respect to the Covered Resources other than the Greenleaf Units, and at the end of the day on September 9, 2022 with respect to the Greenleaf Units. Order No. 202-22-1 as amended by Amendment No. 1 is sometimes referred to herein as Amended Order No. 202-22-1.

On September 7, 2022, CAISO submitted a *Request for Extension of Emergency Order Pursuant to Section 202(c) of the Federal Power Act* (Renewal Application) to the Department. In its Renewal Application, CAISO requests an extension of the expiration date of Order No. 202-22-1 through September 12, 2022.

Emergency Situation

In its Renewal Application, CAISO states that California is experiencing extreme heat, which the CAISO forecasts to continue through at least September 9, 2022. Further, CAISO explains that unpredictable conditions could exacerbate grid reliability issues at any time. The threat of wildfire to the reliable operation of the bulk power system remains significant, and drought conditions are affecting the availability of hydroelectric power. Ambient conditions facing generating facilities are causing de-rates at some units and forcing other units offline. Wildfire threats arising from the extreme heat event are unpredictable and could force transmission and resources out of service. Consequently, the CAISO believes it prudent to ask that the expiration date of Order No. 202-22-1 be extended through September 12, 2022.

Consultation

In considering renewal or reissuance of an order under FPA section 202(c) that may conflict with an environmental law or regulation, DOE is required to "consult with the primary Federal agency with expertise in the environmental interest protected by such law or regulation" and to include "conditions as such Federal agency determines necessary . . . to the extent practicable." 16 U.S.C. § 824a(c)(4). The Environmental

Protection Agency (EPA) is the primary federal agency in this case with expertise in the protected environmental interest, specifically Title V of the Clean Air Act and the Department consulted with EPA after receiving the Renewal Application and EPA did not request any additional conditions be included in this Order. Email from Acting Assistant Administrator Larry Starfield, EPA Office of Enforcement and Compliance Assurance to Kathleen Hogan, Acting Under Secretary for Infrastructure for DOE, September 7, 2022.

Based on the information submitted to the Department, I have determined that an emergency continues to exist in California due to a shortage of electric energy. I find that the issuance of this Order will help to meet the emergency conditions and serve the public interest as required by FPA section 202(c).

ORDER

For the reasons set forth above, pursuant to Section 202(c) of the FPA, I hereby grant CAISO's Renewal Application and issue this Order to extend the expiration date of Amended Order No. 202-22-1 through September 12, 2022.

1. In accordance with the foregoing, (a) the date September 8, 2022 where it appears in Ordering Paragraphs A, D, and H of Order No. 202-22-1 is hereby replaced by the date September 12, 2022, and (b) the date September 9, 2022 where it appears in the Ordering Paragraph of Amendment No. 1 to Order No. 202-22-1 is hereby replaced by the date September 12, 2022.
2. All other terms of Amended Order No. 202-22-1 remain the same and in effect, including Ordering Paragraphs A-H, except as modified herein.
3. This Amendment Number 2 to Order No. 202-22-1 shall be effective upon its issuance and shall expire at 23:59 Pacific Time on September 12, 2022.

Issued in Washington, D.C. at 15:52 Eastern Time on this 8th day of September, 2022.



Kathleen Hogan
Acting Under Secretary for
Infrastructure

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c))
Emergency Order: Tri-State)
Generation and Transmission)
Association, Platte River Power)
Authority, Salt River Project,)
PacifiCorp, and Xcel Energy)

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

Exhibit 2-189
Starfield email to Hoffman

From: Starfield, Lawrence <Starfield.Lawrence@epa.gov>

Date: Monday, Sep 11, 2017, 11:27 AM

To: Hoffman, Patricia <Pat.Hoffman@hq.doe.gov>

Cc: Lucas, John T. <John.T.Lucas@hq.doe.gov>, Minoli, Kevin <Minoli.Kevin@epa.gov>, Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>, Chapman, Apple <Chapman.Apple@epa.gov>

Subject: DOE section 202(c) order

To: Pat Hoffman, DOE Acting Under Secretary for Science and Energy

On August 24, 2017, PJM submitted a renewal application requesting a 90-day renewal of the Order issued on June 16, 2017, by the Secretary of Energy. This email confirms that the Department of Energy (DOE) consulted with the Environmental Protection Agency (EPA), the primary Federal agency with expertise in the Mercury and Air Toxics Standard and section 316(b) of the Clean Water Act, with respect to a renewal order under Section 202(c) of the Federal Power Act related to Virginia Electric and Power Company's Units 1 and 2 at its Yorktown Power Station, near Yorktown, Virginia. See 16 U.S.C. § 824a(c)(4)(B) (Federal Power Act, Section 202(c)(4)(B)). DOE's proposed operational conditions for the order are generally consistent with EPA's Administrative Compliance Order, AED-CAA-113(a)-2016-002, as amended.

Thank you for your coordination on this matter.

Larry Starfield

Acting Assistant Administrator

Office of Enforcement and Compliance Assurance

U.S. EPA

Washington, DC

(202) 564-2440 (office)

(202) 564-8179 (direct)