Department of Energy
Washington, DC 20585

Consumers Energy Company and
Midcontinent Independent System Operator, Inc.
Regarding J.H. Campbell Generating Plant

Order No. 202-26-51

Pursuant to the authority vested in the Secretary of Energy (Secretary) by section 202(c) of the Federal Power Act (FPA),[1] and section 301(b) of the Department of Energy (DOE or Department) Organization Act,[2] and for the reasons set forth below, I hereby determine that a statutory emergency exists in the Midcontinent Independent System Operator, Inc. (MISO) region due to a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy, and other causes. Issuance of this Order will meet the emergency and serve the public interest.

BACKGROUND

The J.H. Campbell Generating Plant (Campbell Plant) is a 1,420 MW coal-fired generation facility primarily owned by Consumers Energy Company (Consumers) and located in West Olive, Michigan. In 2021, Consumers announced that it planned to implement a "speed closure" of the Campbell Plant fifteen years before the end of its scheduled design life.[3] Instead of retiring the Campbell Plant at the end of its design life, Consumers planned to accelerate the Campbell Plant's retirement and discontinue its operations on May 31, 2025.

DOE Order Nos. 202-25-3, 202-25-7, 202-25-9, 202-26-16, 202-26-22, and 202-26-39, issued pursuant to FPA section 202(c), required that the Campbell Plant remain in operation for 90 days, through August 21, 2025, November 19, 2025, February 17, 2026, May 18, 2026, August 16, 2026, and November 14, 2026, respectively. Those orders were based on my determination that emergency conditions existed in the region served by MISO.

Specifically, I determined that MISO faced tight reserve margins due to well-documented year-round resource adequacy concerns, particularly during periods of

[1] 16 U.S.C. § 824a(c).

[2] 42 U.S.C. § 7151(b).

[3] *See* Consumers Energy, *Consumers Energy Announces Plan to End Coal Use by 2025; Lead Michigan's Clean Energy Transformation* (June 23, 2021), https://www.consumersenergy.com/news-releases/news-release-details/2021/06/23/consumers-energy-announces-plan-to-end-coal-use-by-2025-lead-michigans-clean-energy-transformation.

high demand or low generation resource output.[4] I determined that the continued operation of the Campbell Plant would provide additional generation capacity during these periods, which would help prevent the loss of power to homes and businesses that would otherwise pose a risk to public health and safety.[5] I determined that the continued operation of the Campbell Plant was necessary to alleviate immediate and anticipated threats to reliability.[6]

My determination was based on a number of facts. First, the North American Electric Reliability Corporation (NERC) released its 2025 Summer Reliability Assessment on May 14, 2025. In its assessment, NERC stated that "[d]emand forecasts and resource data indicate that MISO is at elevated risk of operating reserve shortfalls during periods of high demand or low resource output."[7] In particular, NERC explained that the retirement of thermal generation capacity increased the likelihood of electricity supply shortfalls.[8]

Second, multiple generation facilities in Michigan have retired in recent years. According to the U.S. Energy Information Administration (EIA), "[s]ince 2020, about 2,700 megawatts of coal-fired generating capacity have been retired and no new coal-fired facilities are planned."[9] Additionally, EIA stated, "Michigan's nuclear power plants typically supplied about 30% of in-state electricity, but the amount of electricity generated by nuclear power plants in Michigan has declined as plants have been decommissioned."[10] The state's Big Rock Point nuclear power plant shut down in 1997, and the Palisades nuclear power plant closed in 2022. As of September 2026, the Palisades plant remains unavailable, although the plant will reportedly resume service in 2027.[11]

Third, the Campbell Plant's retirement would have further decreased available dispatchable generation within MISO's service territory, adding to the loss of 1,575 MW of natural gas and coal-fired generation that has retired since the summer of 2024. Although MISO and Consumers have incorporated the planned retirement of the Campbell Plant into their supply forecasts and Consumers acquired a 1,200 MW natural gas power plant in Covert, Michigan, NERC has noted that "[e]scalating demand

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[4] *See, e.g.*, *Midcontinent Indep. Sys. Operator, Inc.*, DOE Order No. 202-25-9, at 1 (Nov. 18, 2025).

[5] *Id.* at 5; *see also id.* at 1, 8.

[6] *Id.* at 1.

[7] NERC, *2025 Summer Reliability Assessment*, at 16 (May 2025), https://www.nerc.com/globalassets/programs/rapa/ra/nerc_sra_2025.pdf.

[8] *Id.*

[9] EIA, *Mich. State Profile & Energy Estimates* (Nov. 19, 2025), https://www.eia.gov/states/MI/analysis.

[10] *Id*.

[11] *See* Michael Symonds, *Holtec begins refueling Palisades' nuclear reactor,* WMUK (Sep. 1, 2026), https://www.wmuk.org/wmuk-news/2026-09-01/holtec-begins-refueling-palisades-nuclear-reactor.

forecasts and uncertainty around new resource commercialization timing contribute to heightened resource adequacy concerns in the MISO area."[12]

Fourth, MISO's Planning Resource Auction (PRA) Results for the 2026–2027 Planning Year, released in April 2026, notes that "capacity additions need to continue, given expected growth from new large loads."[13] Further, MISO reiterates that "while our market reforms have helped hold the line amidst tighter reserve margin compared to the prior decade, resource adequacy remains at risk, especially as demand for large load additions accelerate."[14]

CONTINUING EMERGENCY CONDITIONS

The emergency conditions that necessitated the issuance of DOE Order Nos. 202-25-3, 202-25-7, 202-25-9, 202-26-16, 202-26-22, and 202-26-39 continue, both in the near and long term.[15] The production of electricity from the Campbell Plant will continue to be a critical asset to maintain reliability in MISO because, as discussed below, there is an electricity shortage in the area that is acute that is not being timely addressed by planning for resource adequacy by the state, its utilities, or a regional entity.[16]

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[12] NERC, *2025 Long-Term Reliability Assessment*, at 15 (Jan. 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf [hereinafter *2025 LTRA*].

[13] MISO, *Planning Res. Auction Results for Planning Year 2026/27*, at 3 (Apr. 2026) (updated May 22, 2026) [hereinafter *MISO 2026–2027 Planning Resource Auction*], https://cdn.misoenergy.org/2026%20PRA%20Results%20Posting%20202 60522%20-%20Corrections754715.pdf.

[14] *Id.* at 7.

[15] It likely would be difficult for a coal-fired electric generating unit to resume operations once retired. Specifically, practical issues, such as employment, contracts, and permits, may greatly increase the timeline for resumption of operations, such that the facility will not be available in the period needed. Moreover, disassembling the plant or other related facilities would exacerbate the challenges. The costs and time of decommissioning a coal plant are extensive, and restarting such decommissioned plants would presumably cost the same as decommissioning in dollars and time, if not more. Thus, continuous operation is required in such cases so long as the Secretary determines a shortage exists and is likely to persist. *See* Jennifer Lessick et al., *Bus. Models for Coal Plant Decommissioning* 9–12 (Pac. Nw. Nat'l Lab'y Report Aug. 2021), https://www.pnnl.gov/main/publications/external/technical_reports/PNNL-31348.pdf; *see also* EIA, *Capital Cost & Performance Characteristics for Util. Scale Elec. Power Generating Techs.* (Jan. 2024), https://www.eia.gov/analysis/studies/powerplants/capitalcost/pdf/capital_cost_AEO2025.pdf.

[16] DOE acknowledges that on September 11, 2026, the United States Court of Appeals for the District of Columbia Circuit issued an opinion interpreting DOE's FPA section 202(c) authority. *People of the State of Michigan v. U.S. Dep't of Energy, et al.*, 191 F.4th 677 (D.C. Cir. 2026). DOE disagrees with the *Michigan* decision and has filed a petition for rehearing en banc in the Court of Appeals. Fed. Resp'ts' Pet. for Reh'g En

According to the EIA-923 monthly generation data reported in August 2026, the total net generation for the Campbell Plant was 2,441,255 MWh from January through July 2026.[17] These generation data indicate that the Campbell Plant is providing vital generation capacity to the region and reducing the risk of substantial harm from an inadequate electricity supply.

MISO's resource adequacy concerns were demonstrated during Winter Storm Fern, when it operated under a cold weather alert and declared conservative operations from January 23 through February 1, 2026. On January 24, MISO declared an Energy Emergency Alert (EEA) 1, as well as an EEA 2 "MaxGen" event[18] for MISO's North and Central Regions due to generator outages, high demand, and transfer capability limits.[19] According to the Environmental Protection Agency, from January 23–February 1, 2026, Campbell produced 201,962 MWh to meet demand during the extreme cold weather conditions.[20]

The joint report from the Federal Energy Regulatory Commission (FERC), NERC, and NERC's Regional Entities highlighting events that occurred during the Winter 2026 Arctic Cold Period (which included Winter Storm Fern) demonstrated the need for dispatchable generation capacity from facilities like the Campbell Plant.[21] Nationwide, coal generation surged to 128 GW, which provided 40 additional gigawatts compared to the average winter output of 88 GW.[22] Furthermore, MISO faced reliability challenges when a market tool failure caused a reduction in power imports into the region for approximately 12 hours on January 24, 2026.[23] Lastly, MISO, along with

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Banc or Panel Reh'g, *People of the State of Michigan v. U.S. Dep't of Energy, et al.,* No. 25-1159 (D.C. Cir. Oct. 26, 2026). In any event, this order is consistent with the opinion in *Michigan*.

[17] *See* EIA, *Form EIA-923 detailed data with previous form data (EIA-906/920)*, https://www.eia.gov/electricity/data/eia923/ (choose "2026: EIA-923 August 2026").

[18] MaxGen events occur when MISO initiates emergency procedures because of concerns over the adequacy of available generation.

[19] MISO, *Operations Rep.*, at 10 (Mar. 24, 2026), https://cdn.misoenergy.org/20260324%20Markets%20Committee%20of%20the%20BOD%20Item%2008%20MISO%20Operations%20Report746763.pdf.

[20] *See* U.S. Env't Prot. Agency, *CAMPD (Clean Air Markets Program Data)*, https://campd.epa.gov/data/custom-data-download (choose "Emissions" from "Data Type" dropdown; then choose "Daily Emissions" from "Data Subtype" dropdown; then choose "Unit (No Aggregation)" from the "Aggregation" dropdown; then click "Apply"; then click "Time Period" button and enter "January 23, 2026" as "Start Date" and "February 6, 2026" as "End Date"; then click "Facility" and select "J H Campbell"; then click "Apply Filter"; then click "Preview Data").

[21] FERC, *Winter 2026 Arctic Events: A Sys. Performance Rev. (Joint Staff Report: FERC, NERC, & its Reg'l Entities)* (2026), https://www.ferc.gov/media/winter-2026-arctic-events-report.

[22] *Id.* at 7.

[23] *Id.* at 20.

neighboring grid operators, experienced load forecasting discrepancies caused by unforeseen colder temperatures at the front end of the Winter 2026 Arctic Cold Period.[24] Together, these events demonstrate that MISO cannot depend on external imports or seasonal projections alone, reinforcing the necessity of maintaining local resources like the Campbell Plant.

MISO's year-round resource adequacy concerns are well documented. In 2021, MISO requested that FERC approve its filing to revise its resource adequacy construct (including the PRA) to establish capacity requirements for each of the four seasons of the year rather than on an annual basis determined by peak summer demand.[25] MISO justified this revision by explaining that "[r]eliability risks associated with resource adequacy have shifted from 'Summer only' to a year-round concern."[26] MISO noted that over 60% of all "MaxGen" events occurred outside of the summer season.[27]

In December 2023, MISO released its *Attributes Roadmap*, in which it presented "an in-depth look at the challenges of operating a reliable bulk electric system in a rapidly transforming energy landscape."[28] Among other things, this report described changes in the time of year during which the risk of the loss of load was greatest. For the 2023–2024 Planning Year, the greatest risk of loss of load was in the summer, but it is expected that by the summer of 2027, there will be an equal loss of load risk in both the summer and fall seasons.[29] MISO also projected that the risk of loss of load in the winter and spring seasons will nevertheless increase over time, although not as high as in the summer or fall.[30]

MISO affirmed the resource adequacy problems occurring outside of its summer season in its 2024 report entitled, *MISO's Response to the Reliability Imperative*.[31] In a section of that report labeled "Risks in Non-Summer Seasons," MISO again stressed that it has resource reliability concerns outside of the summer season by stating:

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[24] *Id.* at 6.

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

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

[27] *Id.* at 3–4.

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

[29] *Id.* at 11.

[30] *Id.* at 13.

[31] MISO, *MISO's Response to the Reliability Imperative* (updated Feb. 2024), https://psc.ky.gov/pscecf/2024-00326/rick.lovekamp%40lge-ku.com/10182024014139/11-2024IRP_Vol_III_RTO_Analysis_Appendix_3_-_MISO_2024_Reliability_Imperative_Report.pdf.

> Widespread retirements of dispatchable resources, lower reserve margins, more frequent and severe weather events and increased reliance on weather-dependent renewables and emergency-only resources have altered the region's highest historic risk profile, creating risks in non-summer months that rarely posed challenges in the past.[32]

These MISO studies indicate that the emergency conditions caused by the loss of generation capacity in MISO extend past the summer season.

Further, in January 2026, NERC released its 2025 Long-Term Reliability Assessment (2025 LTRA).[33] NERC assessed that the MISO region is at high risk of energy shortfalls over the next five years,[34] stating that it faces significant reliability challenges as "projected resource additions do not keep pace with escalating demand forecasts and announced generator retirements."[35] This determination is based on the combination of accelerating demand growth from new data centers and the retirement of existing thermal generators.[36] The 2025 LTRA notes that "MISO's accredited thermal capacity has decreased by 8.8 GW, driven primarily by reductions in accredited capacity of existing facilities and retirements."[37] The report observes that winter peak periods are a particular concern, with projections showing "shortfalls in planned resources for winter peak periods."[38] However, NERC also concluded that "risks could expand into spring and fall generator maintenance periods when the available dispatchable generation is not enough to counter wind and solar variability when demand is high."[39]

The 2025–2026 NERC Winter Reliability Assessment found the MISO region to be at normal risk in 2026 and elevated risk in 2027. The two previous winter studies respectively characterized MISO as a region at elevated risk with the "[p]otential for insufficient operating reserves in above-normal conditions"[40] and noted that "[g]enerating capacity is 10 GW lower (-6.8%) compared to the prior winter as generators have retired, withdrawn from MISO's capacity market, or received lower winter accredited capacity."[41]

NERC released its 2026 Summer Reliability Assessment (SRA) on May 19, 2026. In its assessment, NERC stated that "MISO's peak load has increased by 2.5 GW from

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[32] *Id.* at 12.

[33] *See 2025 LTRA*, *supra* note 12.

[34] *Id.* at 6, 8.

[35] *Id.* at 8.

[36] *Id.* at 43.

[37] *Id.*

[38] *Id*. at 15.

[39] *Id*.

[40] NERC, *2023–2024 Winter Reliability Assessment*, at 5 (Nov. 2023), https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2023.pdf.

[41] NERC, *2024–2025 Winter Reliability Assessment*, at 15 (Nov. 2024), https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2024.pdf.

the 2025 SRA."[42] The 2026 SRA also projects that data center load will continue to accelerate in 2027 and beyond, potentially increasing reliability risk if capacity additions do not keep pace.[43] Furthermore, the 2026 SRA states that "[a]bove-normal summer peak load combined with low resource conditions could result in the need to employ operating mitigations (e.g., load modifying resources) and EEAs."[44] Since the region "benefits from transmission connections with neighbors to meet extreme conditions," MISO's reliance on electricity imports has increased when extreme conditions arise.[45]

There continues to be tight capacity available during summer despite the recent "gains in offered capacity outpacing pressure of load growth" in the MISO region, as reported in its PRA for the 2026-2027 Planning Year.[46] MISO noted that "new generation capacity is coming online, but faster resource additions are still needed to support large-load growth and ensure resource adequacy."[47]

On June 4, 2026, the Organization of MISO States (OMS) and MISO issued the results of their 2026 survey, which has been conducted annually for many years to determine the degree to which expected capacity resources satisfy planning reserve margin requirements.[48] The 2026 OMS-MISO Survey presented projections of resource adequacy for the summer of 2026 and subsequent years and states "growth as submitted by [load serving entities or LSEs] continues to accelerate, with a [compound annual growth rate or CAGR] projected between 3.1% and 5.1% over [the next] five years."[49]

The OMS-MISO Survey further indicates that "[v]arious projected capacity scenarios and large load additions highlight increasing uncertainty and evolving risk"[50] and observes various negative risks. Examples include intensification of winter reliability risks based on resource availability/performance, which exacerbates seasonal reliability vulnerabilities; delay of new resource deployment owing to persistent supply-chain disruptions, labor constraints and permitting challenges; resource adequacy pressures continuing from load growth driven by data centers, new industrial, and commercial development; and continued backlog and uncertainty related to resources

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

[43] *Id.*

[44] *Id*.

[45] *Id.*

[46] MISO 2026–2027 Planning Resource Auction, *supra* note 13, at 3.

[47] *Id.* at 2.

[48] OMS & MISO, *OMS-MISO Survey Results* (updated June 4, 2026) (2026 OMS-MISO Survey), https://cdn.misoenergy.org/20260604%20OMS-MISO%20Survey%20Results%20Workshop%20Presentation761711.pdf.

[49] *Id.* at 2.

[50] *Id.* at 3.

with signed Generator Interconnection Agreements (GIA).[51] In addition, 87 GW of signed GIAs are not yet online, and 192 GW of active GIAs are still under study.[52]

Finally, the OMS-MISO Survey lists ongoing challenges such as more frequent extreme weather; accelerating demand for electricity and large load interconnections; loss of accredited capacity and reliability attributes as resource mixes evolve; the increasing pace of new resources additions; addressing local reliability issues (load pocket); and evolving storage participation.[53]

NERC released its 2026 State of Reliability (SOR) on June 24, 2026. In the SOR, NERC identifies worsening reliability concerns tied to large-load integration and localized operating stress. In its technical discussion of major system events, NERC states "shoulder seasons have become increasingly challenging for [Bulk Power System] operators to manage, resulting in several recent instances of pre-contingent load shedding."[54] In the shoulder months of 2026, MISO issued several alerts to manage grid reliability in response to a variety of factors, including a hot weather or a load pocket event, instances where local generation is needed to meet demand, generally because of transmission constraints.[55] For instance, MISO recorded two reliability-related events in September 2026, the most during any month this year, which entailed a Maximum Generation Warning indicating that operating reserves become insufficient if operational action is not taken to meet increasing electricity demand.[56] Therefore, maintaining existing generation resources is critical to maintaining reliability in the region.

The SOR also finds large load growth is increasing reliability risk and states that "data center and computational loads continued emerging as a major reliability consideration due to their scale, speed of development, and unique operational characteristics."[57] Finally, data in the SOR show that 2025 MISO summer and winter peak demands of 121.6 GW and 108.8 GW, respectively, met or exceeded extreme scenario levels showing how rapid load growth and extreme weather continue to be a real risk in MISO.[58]

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[51] *Id.* at 4.

[52] *Id.*

[53] *Id.* at 16.

[54] NERC, *2026 State of Reliability: Tech. Assessment of 2025 Bulk Power Sys. Performance*, at 5 (June 24, 2026) [hereinafter *2026 State of Reliability*], https://www.nerc.com/globalassets/programs/rapa/pa/nerc_sor_2026_technical_assessment.pdf.

[55] MISO, *Markets and Operations*, https://www.misoenergy.org/markets-and-operations/markets-and-operations/#nt=%2Fmarketsandopstype%3AMonthly%20Reports&t=10&p=0&s=Updated&sd=desc.

[56] MISO, *Monthly Operations Rep.: September 2026*, at 2 (Oct. 27, 2026), https://cdn.misoenergy.org/202609%20Markets%20and%20Operations%20Report791510.pdf.

[57] NERC, 2026 *State of Reliability: Assessment Overview of 2025 Bulk Power System Performance*, at vii (June 24, 2026), https://www.nerc.com/globalassets/programs/rapa/pa/nerc_sor_2026_overview.pdf.

[58] NERC, *2026 State of Reliability, supra* note 52, at 28, 30.

While MISO has been taking steps to address these projected deficits, they have proven inadequate to timely address delays in the construction of new generation assets. For example, on June 6, 2025, MISO submitted a proposal to FERC to establish an Expedited Resource Addition Study (ERAS) process to provide a framework for the expedited study of interconnection requests to address urgent resource adequacy and reliability needs in the near term. This proposal was approved by FERC on July 21, 2025.[59] MISO's ERAS should help expedite the construction of needed new capacity; however, resources studied under ERAS will have commercial operation dates that are at least three years away and are provided an additional three-year grace period to commence commercial operations.[60] In addition, supply chain constraints impeding the acquisition of critical grid components, including large natural gas turbines and transformers, are likely to further hinder rapid construction and exacerbate reliability concerns.[61] Consequently, the new ERAS process is unlikely to result in the addition of any new generation capacity in the next few years, thus will not provide immediate results to avert blackouts.

Overall, neither MISO nor Michigan nor any state within the MISO service territory has timely taken steps to avert this risk to reliability. On the contrary, regarding the Campbell Plant specifically, Michigan approved the planned retirement in 2022, with MISO's support. Further, no one state has taken or could take appropriate actions to support the short- and long- term resource capacity needs here. States and their utilities are subject to environmental compliance and other commitments made during decades long resource adequacy planning procedures that are not nimbly adjusted when faced with an unexpected and substantial energy supply shortfall. Moreover, under the current multi-state electric system, individual states are not incentivized to consider regional reliability needs for resource planning.

Executive orders were issued on January 20, 2025, and April 8, 2025, in which President Donald J. Trump underscored the dire energy challenges facing the Nation due to growing resource adequacy concerns. President Trump declared a national energy emergency in Executive Order No. 14156, "Declaring a National Energy Emergency," in which he determined that the "United States' insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to

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

[60] *Id.* at 19.

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

our Nation's economy, national security, and foreign policy."[62] The Executive Order adds: "Hostile state and non-state foreign actors have targeted our domestic energy infrastructure, weaponized our reliance on foreign energy, and abused their ability to cause dramatic swings within international commodity markets."[63] In the subsequent Executive Order No. 14262, "Strengthening the Reliability and Security of the United States Electric Grid," President Trump emphasized that "the United States is experiencing an unprecedented surge in electricity demand driven by rapid technological advancements, including the expansion of artificial intelligence [super intelligence (SI)] data centers and increase in domestic manufacturing."[64]

In addition, President Trump issued a White House Memo to the Secretary that emphasized the findings of Executive Order No. 14156, stating that "ensuring reliable coal supply chains and baseload power generation capacity is essential to the United States national defense . . . Without sufficient coal-fired baseload power, the United States will lack the stable electricity required to support defense installations, industrial expansion, and the high-energy demands of emerging technologies, such as [super intelligence]."[65] The President "further determine[d] that action to expand coal supply chain capacity and baseload generation availability is necessary to avert an industrial resource or critical technology item shortfall that would severely impair national defense capability."[66]

Further, the Department detailed the myriad challenges affecting the Nation's energy systems in its July 2025 "Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid," issued pursuant to the President's directive in Executive Order No. 14262. The Department concluded that "[a]bsent decisive intervention, the Nation's power grid will be unable to meet projected demand for

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

[63] *Id*.

[64] Exec. Order No. 14262, 90 Fed. Reg. 15521 (Apr. 8, 2025), https://www.federalregister.gov/documents/2025/04/14/2025-06381/strengthening-the-reliability-and-security-of-the-united-states-electric-grid. Presidential Executive Order 14434 renamed artificial intelligence to super intelligence (SI). Exec. Order No. 14434, 91 Fed. Reg. 63129 (Sep. 29, 2026), https://www.federalregister.gov/documents/2026/10/02/2026-20321/inaugurating-the-era-of-super-intelligence.

[65] Memorandum for the Sec'y of Energy, Presidential Determination No. 2026-12 (Apr. 20, 2026) (Presidential Determination Pursuant to Sec. 303 of the Defense Prod. Act of 1950, as Amended, on Coal Supply Chains & Baseload Power Generation Capacity), 91 Fed. Reg. 21935 (Apr. 23, 2026), https://www.federalregister.gov/documents/2026/04/23/2026-08010/presidential-determination-pursuant-to-section-303-of-the-defense-production-act-of-1950-as-amended.

[66] *Id.*

manufacturing, re-industrialization, and data centers driving [SI] innovation."[67] The prolific growth of data centers for the development of SI, as well as their immense energy needs, presents a new and unexpected source of load growth. This growth is illustrated by the fact that there are more than twenty SI companies operating in Michigan alone.[68] In addition, as just one example, Consumers has announced an additional 1 GW of new power to a planned hyperscale data center and "continue[s] to see positive momentum with data centers within the 9 GW pipeline . . . ."[69]

Grid operators—including MISO itself—have also acknowledged the Nation's current energy crisis. For instance, during a March 25, 2025, hearing before the House Committee on Energy and Commerce, MISO's Senior Vice President for Planning and Operations, Jennifer Curran, testified that "the MISO region faces resource adequacy and reliability challenges due to the changing characteristics of the electric generating fleet, inadequate transmission system infrastructure, growing pressures from extreme weather, and rapid load growth."[70] Ms. Curran also described "much stronger growth [in demand for electricity] from continued electrification efforts, a resurgence in manufacturing, and an unexpected demand for energy-hungry data centers to support [SI]."[71] She added, "[a] growing reliability risk is that the rapid retirement of existing coal and gas power plants threatens to outpace the ability of new resources with the necessary operational characteristics to replace them."[72]

Given these facts, I identify a risk of substantial energy supply shortfall in the MISO region, namely rising electricity demand coupled with a decrease in the availability of dispatchable generation. I also identify a risk of substantial harm from this inadequate electricity supply, as blackouts resulting from the shortfall are probable and could substantially harm public health and safety. Further, I find the state and regional entities have not and will not timely take steps that must be taken immediately to achieve adequate reliability. As such, the identified risk of substantial harm calls for immediate

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

[68] Ekku Jokinen, *Top 21 A.I. Cos. in Mich.*, INVEN (last accessed Aug. 13, 2025), https://www.inven.ai/company-lists/top-21-artificial-intelligence-companies-in-michigan.

[69] *See* Zachary Skidmore, *Mich. util. Consumers Energy to provide 1GW of power to new hyperscale data center*, DATA CENTER DYNAMICS (Aug. 5, 2025) (quoting Consumers CEO Garrick Rochow), https://www.datacenterdynamics.com/en/news/michigan-utility-consumers-energy-to-provide-1gw-of-power-to-new-hyperscale-data-center/.

[70] *Keeping the Lights On: Examining the State of Regional Grid Reliability; Hearing Before the House Committee on Energy and Commerce, Subcommittee on Energy*, 119th Cong. 5 (2025) (statement of Ms. Jennifer Curran, Senior Vice President for Planning and Operations, MISO), https://www.congress.gov/119/meeting/house/118040/witnesses/HHRG-119-IF03-Wstate-CurranJ-20250325.pdf.

[71] *Id.* at 6.

[72] *Id.* at 7.

action by DOE in particular, as opposed to by the states or regional entities, since coordinated state and regional resource adequacy planning, available per FPA section 202(a) and (b), has proven inadequate to timely address the identified risk.

Pursuant to section 202(c)(4)(B) of the FPA, DOE has consulted with the primary Federal agency with expertise in the environmental interest protected by the laws or regulations that may conflict with this Order. The agency did not submit additional conditions for inclusion in this Order.

ORDER

FPA section 202(c)(1) provides that whenever the Secretary determines "that an emergency exists by reason of a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy," the Secretary has the authority "to require by order . . . such generation, delivery, interchange, or transmission of electric energy as in [his] judgment will best meet the emergency and serve the public interest."[73] This statutory language constitutes a specific grant of authority to the Secretary to require the continued operation of the Campbell Plant when the Secretary has determined that such operation will best meet an emergency.

As described above, the emergency conditions resulting from increasing demand and shortage of electric energy from premature retirement of generation facilities will continue in the near term and are also likely to continue in subsequent years. This inadequate electricity supply threatens a loss of power to homes and businesses, presenting a substantial risk of harm to public health and safety.

I have determined that, to best meet the statutory emergency arising from increased demand, determined shortage, and other causes, and to serve the public interest under FPA section 202(c), the Campbell Plant shall be made available for operation through February 12, 2027.[74]

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

A. From November 15, 2026, MISO and Consumers shall take all measures necessary to ensure that the Campbell Plant is available to operate to meet the emergency. For the duration of this Order, MISO is directed to take every step to employ economic dispatch of the Campbell Plant only during the hours necessary to meet the emergency and to minimize costs to ratepayers. Following the conclusion of this Order, sufficient time for orderly ramp down is permitted, consistent with industry

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

[74] 16 U.S.C. § 824a(c)(4).

practices. Consumers is directed to comply with all orders from MISO related to the availability and dispatch of the Campbell Plant.

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

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

D. By November 28, 2026, MISO is directed to provide the Department (via AskCR@hq.doe.gov) with information concerning the measures it has taken and is planning to take to ensure the operational availability of the Campbell Plant consistent with this Order. MISO shall also provide such additional information regarding the environmental impacts of this Order and its compliance with the conditions of this Order, in each case as requested by the Department from time to time.

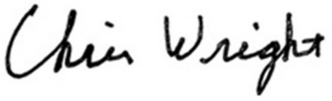
E. Consumers is directed to file with FERC tariff revisions or waivers to effectuate this Order, as needed. Rate recovery is available pursuant to 16 U.S.C. § 824a(c).

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

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

H. This Order shall be effective on November 15, 2026, through February 12, 2027, with the exception of applicable compliance obligations in paragraph D.

Issued in Washington, D.C. on this 13th day of November 2026.



Chris Wright
Secretary of Energy

cc:

Federal Energy Regulatory Commission

Chairman Laura V. Swett
Commissioner David Rosner
Commissioner Lindsay S. See
Commissioner Judy W. Chang
Commissioner David A. LaCerte

Michigan Public Service Commission

Chairman Dan Scripps
Commissioner Katherine Peretick
Commissioner Shaquila Myers