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June 11, 2026

The Honorable Chris Wright
Secretary of Energy
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Re: Request for Emergency Order Under Section 202(c) of the Federal Power Act

Dear Secretary Wright:

Pursuant to Section 202(c) of the Federal Power Act ("FPA") and the regulations promulgated thereunder by the Department of Energy ("Department" or "DOE"), Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively, "Duke Energy") respectfully request that the Secretary of Energy ("Secretary") find that an emergency exists by reason of a sudden increase in the demand for electric energy within the Duke Energy service territory that requires intervention by the Secretary, in the form of a Section 202(c) emergency order, to preserve the reliability of the bulk electric power system. Duke Energy respectfully requests that the Secretary issue an order immediately, effective 4 PM Eastern Standard Time (EST) on June 11, 2026, authorizing certain electric generating units located within the Duke Energy service territory to operate up to their maximum generation output levels as needed for grid reliability under the limited circumstances described in this letter, notwithstanding air emissions or other permit limitations. Duke Energy further requests that the order remain effective through 10 PM EST on June 12, 2026. Duke Energy is requesting the Department issue an order for this duration because Duke Energy anticipates unusually high load forecasts during this time of approximately 13,304 MW for DEP and 21,285 MW for DEC.

Background

A strong upper-level ridge is building across the Southeastern and Mid-Atlantic US, producing an extended period of extreme heat across the DEC and DEP service territories beginning Thursday, June 11th through Sunday, June 14th. High temperatures across the Carolinas are forecast to reach 93-97°F in DEC and 96-101°F in DEP, representing departures of approximately 5-11°F above normal. Overnight temperatures will remain in the low-mid 70s°F, limiting nighttime recovery of cooling equipment and sustaining elevated electricity demand around the clock. Dew points in the upper 60s to lower 70s°F combined with extreme heat, will result in afternoon heat index values of 102-106°F for much of the service area. Peak heat index

values will occur Thursday – Friday, then less extreme this weekend ranging from 96–100°F. The heat event is further amplified by an ongoing severe drought across the Carolinas. There will be a localized threat of afternoon and evening thunderstorms for the service area Thursday – Friday that may provide minor relief.

The consecutive-day nature of this event – with no significant overnight relief and progressively hotter Thursday into Friday – is expected to compound residential and commercial cooling loads as air condition systems run continuously, driving system demand to unusually high levels. As a result, Duke Energy anticipates peak electrical loads of approximately 21,285 MW for DEC and 13,345 MW for DEP occurring Friday afternoon. Higher-than-usual loads continue this weekend, then finally relent next Monday due to higher rain and thunderstorm chances.

While the vast majority of generating units in the Duke Energy service territory continue to function adequately under these stressed conditions, some units are limited in providing the generation needed by the system by conditions and limitations in their environmental permits. As a result, Duke Energy is concerned that under these conditions the system may not have sufficient generation available to meet this unusually high demand and may be forced to curtail load in order to maintain security and reliability of the grid. In anticipation of this emergency, Duke Energy has initiated its Emergency Operating Plans to mitigate an Operating Emergency.

When needed during an emergency, Duke Energy takes extensive conservation measures in an effort to reduce load so that the supply of power continues to be sufficient to meet system demand and reserve requirements. Specifically, Duke Energy issues public conservation appeals encouraging customers to reduce usage, curtails all recallable energy sales, and implements its load management program, including implementing residential demand response programs, large load curtailments, and a 5% voltage reduction. Duke Energy also notifies wholesale customers to implement in-kind load management programs. In addition to the conservation measures, Duke Energy also exhausts its ability to obtain more power through other means, including committing all available generation resources, implementing Emergency Ratings output, as well as purchasing external capacity where available and deliverable. As a result of these efforts, Duke Energy expects to reduce demand by more than approximately 400 MW, with the capability to reduce as much to an additional 800 MW and has secured an additional 1259 - 1563 MW in DEC and 450 – 650 MW in DEP. Duke Energy will continue to pursue more capacity as available.

Duke Energy commits to continuing to take such actions as necessary, including utilizing other supply resources, before operating any units or calling on any generator to operate any units in a manner that will result in a conflict with a requirement of any federal, state, or local environmental statute or regulation, including requirements in permits issued pursuant to such laws or regulations. Even with the requested order, however, it is possible that Duke Energy will have no choice but to curtail firm load to ensure system reliability.

Relief Requested

Duke Energy and generators within the Duke Energy service territory may have to limit some generating units in their power output due to emissions, effluent, and other limits established

by federal and state environmental laws and permits. These units are described in **Exhibit A** (the "Specified Resources").[1] Specifically, should units experience an equipment malfunction that affects the injection of water on a simple cycle combustion turbine or the use of ammonia on a combined cycle combustion turbine, compliance with NOx emission limitations may not be achievable. Other control devices, such as electrostatic precipitators (ESP) can experience mechanical issues when running at maximum load for extended periods of time concurrent with elevated ambient temperatures and humidity. Performance issues related to the ESP can result in an increase in filterable particulate and metallic particulate emissions from the unit. Finally, units are returning from planned outages to support this period of peak demand. Permits detail Work Practice Standards related to the duration of start-up activities. It may be necessary to exceed these restrictions as personnel address any outstanding issues from the outage scope and work towards the goal of bringing the asset back to full capability. Because the output from all of the units subject to these restrictions would help to reduce the need for any firm load shedding that may be required during this hot weather event, Duke Energy seeks an immediate order from the Department authorizing the provision of additional energy from the Specified Resources, as well as any other generating units, as needed for grid reliability, regardless of emissions or other permit limitations.

Several of the Specified Resources are subject to environmental permit conditions or regulations that limit their emissions, hours of operation, or fuel burned during a specified period, usually on a 12-month or 30-day rolling average. Consistent with the Department's February 4, 2026 Order Granting Rehearing, Duke Energy requests that the Department of Energy confirm that, under section 202(c)(3) of the FPA, the emissions from, hours of operation of, and fuel burned by Specified Resources while the Order is in effect will not be counted towards these limits.

To minimize adverse environmental impacts as set forth herein, this order would limit operation of dispatched units to the times and within the parameters determined by Duke Energy as necessary for grid reliability to avoid adverse health and safety impacts to customers from shedding firm customer load. Consistent with good utility practices, Duke Energy shall exhaust all reasonably and practically available resources, including available imports, demand response and identified behind-the-meter generation resources selected to minimize an increase in emissions to the extent that such resources provide support to maintain grid reliability prior to dispatching the

[1] In the event that Duke Energy identifies additional units that it deems necessary to operate in violation of federal and state environmental laws in order to maintain the reliability of the power grid when the demand on the Duke Energy system exceeds expected energy and reserve requirements, Duke Energy shall provide prompt written notice to the Department of Energy at AskCR@hq.doe.gov with an updated Exhibit A to its application with the name and location of those units, the fuel type of such unit, and the anticipated category of environmental impact, at 11:00 Eastern Standard Time or 21:00 Eastern Standard Time, whichever follows closest in time to the unit identification by Duke Energy to the greatest extent feasible. Duke Energy requests that such additional generation units be deemed a resource covered by any order for the hours prior to the required written notice to the Department. However, if the Department of Energy notifies Duke Energy that it does not approve of such generation unit being designated as a resource covered by any order, such generation unit shall not constitute a covered resource upon notification from the Department.

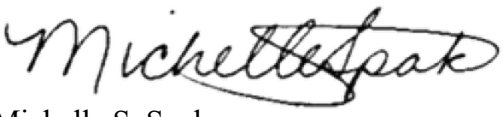
Specified Resources at levels in violation of environmental laws. Duke Energy shall provide a daily notification to the Department by email to AskCR@hq.doe.gov reporting each generating unit that has operated in reliance on the allowances contained in this Order.

Duke Energy requests this order because it is committed to public health and safety, takes its compliance obligations seriously, and understands the importance of the environmental permit requirements that are at issue. In this case, the risk of power outages in extremely hot temperatures is a more imminent and prominent threat to the communities in our service territory than the temporary exceedances of those permit limits that would be allowed under the order. Authorizing the Specified Resources to operate notwithstanding permit and other limitations will reduce the likelihood that Duke Energy will need to curtail load.

This request is narrowly tailored to allow only the exceedances that are necessary to ensure reliability during the limited timeframe of this request, ensuring that the generation capacity subject to emissions limits and other permit restrictions will be the last generation that is made available for dispatch to meet system demand, thus minimizing any environmental impact to the greatest degree possible.

Duke Energy greatly appreciates the Department of Energy's expedited consideration of this request and commits to respond to any requests for additional information on an expedited basis. Please do not hesitate to contact me or my staff if you have any questions or require additional information in order to act on this request.

Respectfully Submitted,



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