January 30, 2026

VIA E-MAIL

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

Re: Request for Extension of Order No. 202-26-03; Emergency Order Under Section 202(c) of the Federal Power Act

ISO-NE Respectfully Requests an Extension of the January 25 Order

by January 30, 2026

Dear Secretary Wright:

Pursuant to Section 202(c) of the Federal Power Act ("FPA"),[1] part 205, subpart W, of the regulations of the Department of Energy ("DOE"),[2] and DOE Order No. 202-26-03 issued on January 25, 2026 by the Secretary of Energy ("Secretary") ("January 25 Order"), ISO New England Inc. ("ISO-NE") respectfully requests that the Secretary find that a temporary condition continues to exist within the ISO-NE region that requires short-term intervention by the Secretary to preserve the reliability of the bulk electric power system, and extend the January 25 Order to be effective for two additional weeks, from January 31, 2026 at 11:59 PM EST through February 14, 2026 at 11:59 PM.[3]

ISO-NE respectfully requests that the Secretary issue an order granting this request for extension of the existing January 25 Order immediately ("Extension Order"), effective as of the expiration of the January 25 Order, authorizing generating units located within the ISO-NE region to operate up to their maximum generation output levels, notwithstanding air quality or other

[1] 16 U.S.C § 824a(c).

[2] 10 C.F.R. Part 205, Subpart W.

[3] To facilitate the Secretary's consideration of this request, ISO-NE incorporates by reference ISO-NE's *Request for Emergency Order Under Section 202(c) of the Federal Power Act* submitted on January 25, 2026, including all attachments thereto, as well as Exhibit A as updated on January 29, 2026 at 9:00 PM EST ("Exhibit A Updated January 29") (collectively, "the January 25 Application").

permit limitations arising under federal, state, or local law or regulation, or other applicable source of law. While ISO-NE is not currently experiencing emergency conditions, given the forecasted continuation of the long-duration extreme cold weather event and challenges associated with replenishment of stored fuels across the region, ISO-NE foresees the need to maximize the availability of all the generating resources in the New England region, *i.e.* all generating resources that are part of the generation resource mix are needed, including, but not limited to, the resources described in Exhibit A Updated January 29.

In accordance with 10 CFR § 205.391(a), ISO-NE requests that the Extension Order be entered as soon as possible today, January 30, 2026, to be made effective at the expiration of the January 25 Order. ISO-NE further requests that the Extension Order remain in effect through 11:59 PM EST on February 14, 2026.

I. BACKGROUND

New England is experiencing a prolonged extreme cold weather event that poses risk to electric reliability throughout the region.[4] Given the prolonged extreme cold weather event, ISO-NE issued an Abnormal Conditions Alert on January 25, 2026, and issued a cold weather watch for January 30, 2026.[5] The Abnormal Conditions Alert is expected to remain in place through the remainder of the prolonged cold weather event. In many parts of the ISO-NE Balancing Authority Area, temperatures for January 30 through February 17, 2026 are forecasted to continue to be well below average, with January 31 forecasted to be the coldest day of the period.[6] Temperatures from February 8 to 11 are forecasted to be well below average. In addition, there is the potential for a nor'easter to impact portions of the region from January 31 to February 1, which could significantly impact shipping of stored fuels that arrive at many of the region's generating stations located along the coastline, further hindering fuel delivery and replenishment efforts. The projected prolonged extreme cold weather event is expected to result in a sustained high level of energy demand in the coming weeks. While replenishment of stored fuels is underway at many facilities in the region, it is this sustained energy demand, particularly following a preceding period of similar conditions, that may stress the region by further depleting its supplies of stored fuels, thus highlighting the need for all resources to remain available as needed.

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[4] *See* https://www.iso-ne.com/static-assets/documents/100031/2026-01-29_21-day_energy_emergency_forecast_and_report.pdf.

[5] *See* https://www.iso-ne.com/event-details?eventId=161828; https://www.iso-ne.com/event-details?eventId=161880.

[6] *See* https://www.iso-ne.com/static-assets/documents/100031/2026-01-29_21-day_energy_emergency_forecast_and_report.pdf.

Although the majority of generating units in the ISO-NE region continue to function adequately, some units are experiencing challenges due to emissions and air permitting limitations, or other operating constraints. Since the January 25 Application, generator owners/operators of 51 resources, totaling approximately 10,189 MW,[7] have notified ISO-NE that their generating units may experience difficulty operating during the extreme cold weather event due to emissions/air permitting limitations, or other operating constraints.[8]

In addition to the measures described above, ISO-NE is prepared to employ measures in its Operating Procedures, such as Master Local Control Center Procedure No. 2 and Operating Procedure No. 4. These measures are designed to address abnormal conditions or deficiencies to ensure the supply of generation will continue to be sufficient to meet demand and reserve. Granting this request for extension of the January 25 Order, as requested herein, will ensure the continued availability of generating resources in the region.

II. RELIEF REQUESTED

The January 25 Order at Paragraph G states that a request to extend the January 25 Order must be submitted in advance of the January 25 Order's expiration date of January 31, 2026 at 11:59 PM EST. Because of the forecasted continuation of long-duration extreme cold weather, ISO-NE respectfully submits this extension request. As noted above, since the issuance of the January 25 Order, ISO-NE has been notified by multiple generator owners/operators that their generating units may not be able to operate due to emissions, effluent, or other limits established by federal environmental permits and state requirements, or that, due to continuing cold weather conditions, may become subject to such operational limitations. These generating units are described in Exhibit A Updated January 29.[9] Moreover, several generating units are experiencing stored fuel replenishment challenges.

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[7] These values exclude Fore River, which was included in the Exhibit A attached to the January 25 Application. With Fore River, the total resources are 52, comprising 11,007 MW.

[8] Consistent with Paragraph D of the Order, ISO-NE has updated, and submitted to DOE (via AskCR@hq.doe.gov), Exhibit A to reflect the additional units that ISO-NE has deemed necessary to maintain the reliability of the grid. Exhibit A Updated January 29 is attached.

[9] In the event that ISO-NE identifies additional generating units that it deems necessary to operate in excess of federal environmental permitting limits in order to maintain the reliability of the power grid in the ISO-NE region, ISO-NE will continue to provide prompt written notice to DOE at AskCR@hq.doe.gov with the name and location of those units that ISO-NE has identified, as well as notice by the same means as an updated Exhibit A to its request such additional generation 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 ISO-NE to the greatest extent feasible. ISO-NE requests that such additional generation units be deemed a resource covered by any order for the hours prior to the required written notice to DOE. ISO-NE further requests that it dispatch such additional generating units, provided that if DOE notifies ISO-NE that it does not

(continued...)

During the prolonged extreme cold weather event described above, ISO-NE anticipates that all generating resources may be needed. Accordingly, ISO-NE seeks an immediate order from DOE granting this request for extension and broadly authorizing the provision of energy from all generating units identified in Exhibit A Updated January 29, as well as any other generating units subject to emissions or other permit limitations that subsequently notify ISO-NE for inclusion in Exhibit A as covered resources.

This request for relief is narrowly tailored to allow only the exceedances that are necessary to help ensure reliability of the grid during the period of relief requested herein. Upon issuance of the Extension Order by DOE, ISO-NE will issue a market notice to all ISO-NE market participants. The notice would require that any market participant that finds it necessary to utilize this allowance must notify ISO-NE in advance of doing so. This initial notification requirement to ISO-NE would apply to all generating units, excluding those already identified in Exhibit A Updated January 29.[10]

Pursuant to Paragraph B of the January 25 Order, ISO-NE commits to continue providing daily notice to DOE of each of those generating units that have been designated to use this allowance. ISO-NE is prepared to provide any additional information DOE may request. ISO-NE also commits to respond to any requests for additional information on an expedited basis.

III. CONCLUSION

ISO-NE does not submit this request for extension of the January 25 Order lightly and understands the importance of the environmental permit limits that are at issue. Granting the request for extension of the January 25 Order will help ISO-NE continue to maximize the availability of all generating resources in New England to meet expected demand for electricity during the prolonged extreme cold weather event.

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 DOE.

[10] The generator owners/operators for all the generating units appearing in Exhibit A Updated January 29 to this request for extension have requested to be included on the list. All generator owners/operators with units appearing in Exhibit A Updated January 29, as well as those associated with generating units that are subsequently added in accordance with Paragraph D of the January 25 Order, must report any and all requested information by ISO-NE to facilitate ISO-NE's reporting under Paragraphs B and E of the January 25 Order.

ISO-NE greatly appreciates the DOE's expedited consideration of this request. Please do not hesitate to contact the undersigned if you have any questions or require additional information in order to act on this request.

Respectfully submitted,

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Attachment: Exhibit A Updated January 29

cc: Vamsi Chadalavada, ISO-NE President and Chief Executive Officer
Maria Gulluni, ISO-NE VP, General Counsel and Chief Compliance Officer
Anne George, ISO-NE VP, Chief External Affairs and Communications Officer

Exhibit A
Units Identified as Likely to Encounter Permit Limitations
DOE Order No. 202-26-03, Additional Units
January 29, 2026, 9:00 PM[1]

Resource Name and Location	Owner/Operator	Fuel Type	Winter Rating	Restriction (e.g., SOx, NOx, Hg, Waste Water)
Fore River Energy Center; Weymouth, MA	Calpine	Natural Gas/Distillate Fuel Oil (dual fuel)	818 MW	NOx, CO & NH3 Slip
Newington Energy, LLC; Newington, NH	Essential Power Newington, LLC	Natural Gas/Oil	650 MW	NOx, CO, NH3, PM, VOC, and opacity emission limits. Startup and transition operating limits
Northfield Mountain FERC ID P-2485; Northfield, MA	FirstLight Power Services LLC	Water/Pump Storage	1168 MW	Upper Reservoir Licensed Operating Range. FirstLight is requesting the capability to use the full capability of its upper reservoir until Saturday, January 31, 2026. The elevation for the storage would be 920-1004.5msl
Ocean State Power Phase I; Burrillville, RI	Ocean State Power	Natural Gas/#2 Fuel Oil (dual fuel)	310 MW	NOx; Discretionary oil burn limits

[1] **Changes to information reflected in previously submitted Exhibit A updates are reflected in bold text.**

Ocean State Power Phase II; Burrillville, RI	Ocean State Power	Natural Gas/#2 Fuel Oil (dual fuel)	334 MW	NOx; Discretionary oil burn limits
Tiverton Power Unit GT1; Tiverton, RI	Tiverton Power LLC	Natural Gas	300 MW	NOx, CO, NH3, PM, VOC and opacity emission limits. Startup and transition operating limits
Rumford Power LLC unit's Gas Turbine (GT1); Rumford, ME	Rumford Power, LLC	Natural Gas	290 MW	NOx, CO, NH3, PM, VOC, and opacity emission limits. Maximum heat input operating limits
Canal 3; Sandwich, MA	JERA Americas Inc.	Dual Fuel – Natural Gas and ULSD	336.2 MW	Restrictions (e.g., Sox, NOx, Hg, Waste Water); General air permit restriction on fuel
Manchester 10 10A CC, Manchester 11 11A CC, Manchester 9 9A CC; Providence, RI	Dynegy Market and Trade/ Vistra Operations	Natural Gas and Ultra Low Sulfur Diesel	Man 10 – 167.25 MW, Man 11 and 9 – 170 MW (All three have max output of 147 MW on ULSD)	12-month rolling NOx limit, and 12-month rolling Fuel Oil throughput limit; Startup and transition operating limits
Bridgeport Harbor 5; Bridgeport, CT	Alpha Generation	Natural Gas/ Distillate Fuel (dual fuel)	504.9 MW	Daily effluent volume in WMPCA Permit (waste water), NOx, CO, O2, and ammonia emissions limits

New Haven 1; New Haven, CT	Alpha Generation	Natural Gas/ Residual Fuel (dual fuel)	439.6 MW	NOx, opacity, and Title V derate requirement
Montville 6; Uncasville, CT	Alpha Generation	Residual Fuel	400.4 MW	NOx
Devon 10; Milford, CT	Alpha Generation	Distillate Fuel	18.8 MW	**NOx**
Devon 11; Milford, CT	Alpha Generation	Distillate Fuel	38.8 MW	**NOx and water injection**
Devon 12;Milford, CT	Alpha Generation	Distillate Fuel	38.4 MW	**NOx and water injection**
Devon 13; Milford, CT	Alpha Generation	Distillate Fuel	39 MW	**NOx and water injection**
Devon 14; Milford, CT	Alpha Generation	Distillate Fuel	32.2 MW	**NOx and water injection**
Cos Cob 11; Greenwich, CT	Alpha Generation	Distillate Fuel	23 MW	**NOx and water injection**
Cos Cob 12; Greenwich, CT	Alpha Generation	Distillate Fuel	23 MW	**NOx and water injection**
Cos Cob 13; Greenwich, CT	Alpha Generation	Distillate Fuel	15.16666667 MW	**NOx and water injection**
Cos Cob 14; Greenwich, CT	Alpha Generation	Distillate Fuel	15.16666667 MW	**NOx and water injection**
New Haven 2; New Haven, CT	Alpha Generation	Natural Gas/kerosene (dual fuel)	43 MW	NOx, water injection, ammonia, start up/shut down, and fuel flow limits
New Haven 3; New Haven, CT	Alpha Generation	Natural Gas/kerosene (dual fuel)	43 MW	NOx, water injection, ammonia, start up/shut down, and fuel flow limits
New Haven 4; New Haven, CT	Alpha Generation	Natural Gas/kerosene (dual fuel)	43 MW	NOx, water injection, ammonia, start up/shut down, and fuel flow limits

Bridgeport Energy Units GT11 and GT12; Bridgeport, CT	Bridgeport Energy, LLC	Natural Gas	577 MW	NOx, CO, NH3, PM, VOC and opacity emission limits. Maximum heat input operating limits. NEPDES cooling water discharge limits.
PPL Wallingford Unit 1; Wallingford, CT	Boston Energy Trading and Mark	Natural Gas	50 MW	Hourly NOx
PPL Wallingford Unit 2; Wallingford, CT	Boston Energy Trading and Mark	Natural Gas	49.559 MW	Hourly NOx
PPL Wallingford Unit 3; Wallingford, CT	Boston Energy Trading and Mark	Natural Gas	50 MW	Hourly NOx
PPL Wallingford Unit 4; Wallingford, CT	Boston Energy Trading and Mark	Natural Gas	49.709 MW	Hourly NOx
PPL Wallingford Unit 5; Wallingford, CT	Boston Energy Trading and Mark	Natural Gas	49.43 MW	Hourly NOx
Wallingford Unit 6 and Unit 7; Wallingford, CT	Boston Energy Trading and Mark	Natural Gas	94.57 MW	Hourly NOx
Devon Gen Conn 15; Milford, CT	GenConn Devon LLC	KE/NG	49.2 MW	NOx, Water Injection, Ammonia Injection

Devon Gen Conn 16; Milford, CT	GenConn Devon LLC	KE/NG	49.2 MW	NOx, Water Injection, Ammonia Injection
Devon Gen Conn 17; Milford, CT	GenConn Devon LLC	KE/NG	49.2 MW	NOx, Water Injection, Ammonia Injection
Devon Gen Conn 18; Milford, CT	GenConn Devon LLC	KE/NG	49.2 MW	NOx, Water Injection, Ammonia Injection
Middletown Gen Conn 12; Middletown, CT	GenConn Middletown LLC	KE/NG	49.2 MW	NOx, Water Injection, Ammonia Injection
Middletown Gen Conn 13; Middletown, CT	GenConn Middletown LLC	KE/NG	49.2 MW	NOx, Water Injection, Ammonia Injection
Middletown Gen Conn 14; Middletown, CT	GenConn Middletown LLC	KE/NG	49.2 MW	NOx, Water Injection, Ammonia Injection
Middletown Gen Conn 15; Middletown, CT	GenConn Middletown LLC	KE/NG	49.2 MW	NOx, Water Injection, Ammonia Injection
NEA Bellingham; Bellingham, MA	NextEra Energy Marketing	Natural Gas/Ultra low sulfur diesel (Dual Fuel)	326.57 MW	NOx, Opacity emission limits
FPL Energy Wyman IV, LLC; Yarmouth, ME	NextEra Energy Marketing	Residual Fuel Oil	611 MW	Opacity emissions limits, NOx, SO2, CO, Heat Input & CO2
FPL **Energy** Wyman, LLC; Yarmouth, ME	NextEra Energy Marketing	Residual Fuel Oil	116 MW	Opacity emissions limits, NOx, SO2, CO, Heat Input & CO2
Pierce Station; Wallingford, CT	MPH AL Pierce, LLC	Natural Gas/Ultra low sulfur diesel (Dual Fuel)	93.729 MW	NOx
Granite Ridge Energy;	Calpine Energy Services	Natural Gas	732 MW	NOx, CO, NH3

Londonderry, NH				
Canal 1; Sandwich, MA	JERA Americas Inc.	No. 6 oil	568 MW	All emissions limits
Canal 2; Sandwich, MA	JERA Americas Inc.	Dual Fuel - Natural Gas and No. 6 oil	558.8 MW	All emissions limits
Watson 1; Braintree, MA	Braintree Electric Light Department	Natural Gas/Distillate Fuel Oil (**Dual** Fuel)	57.4 MW	NOx, CO and NH3 Slip
Watson **2**; Braintree, MA	Braintree Electric Light Department	Natural Gas/Distillate Fuel Oil (**Dual** Fuel)	57.4 MW	NOx, CO and NH3 Slip
Dartmouth CT Generator 3; Dartmouth, MA	Dartmouth Power Generation, L.L.C. (GP) and Dartmouth Power Holding Company, LLC (LP)	Distillate Fuel Oil	21.778 MW	Gas-Dual Fuel Steam Unit
Dartmouth Power; Dartmouth, MA	Dartmouth Power Generation, L.L.C. (GP) and Dartmouth Power Holding Company, LLC (LP)	Distillate Fuel Oil	**67.656** MW	Gas-Dual Fuel Steam Unit
Rocky River; New Milford, CT	**FirstLight Power Services LLC**	**Water/Pump Storage**	**29 MW**	**FERC License Article 403 winter drawdown schedules; Littoral Zone Monitoring Plan**
Cos Cob 10; Greenwich, CT	**Alpha Generation**	**Distillate Fuel**	**23 MW**	**NOx and water injection**