

January 31, 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 administered by the U.S. Department of Energy (“DOE” or “Department”), the City of Lakeland, Florida (“City”), on behalf of its municipal electric utility, Lakeland Electric, respectfully requests that the Secretary of Energy determine that an emergency condition exists that requires federal intervention to preserve the reliability of the bulk electric power system serving the City of Lakeland.

The City of Lakeland respectfully requests the immediate issuance of a Section 202(c) emergency order, effective January 31, 2026, authorizing Lakeland Electric to operate certain City-owned electric generating units up to their maximum available output under the limited and temporary circumstances described herein, notwithstanding applicable air emissions or other permit limitations. Further, the City further requests that the order remain effective through 10:00 am Eastern Standard Time on February 6, 2026.

As a last measure prior to firm load shedding, the City further requests authorization for Lakeland Electric to direct and utilize available backup generation resources at City-owned water and wastewater treatment facilities and other non-essential municipal facilities within the City of Lakeland to reduce electric system load during this emergency.

I. Background

The City of Lakeland, through Lakeland Electric, owns and operates electric generation, transmission, and distribution facilities that provide electric service to customers within the City and surrounding areas. Beginning Friday, January 23, and continuing through Monday, January 26, 2026, a significant winter weather event—Winter Storm Fern—impacted large portions of the United States, resulting in prolonged extreme cold temperatures, high winds, and increased stress on electric generation and fuel supply systems.

Forecasts indicate an additional round of extreme cold will impact Central Florida beginning January 30, 2026, with sustained below-normal temperatures expected into the following week. As a result, Lakeland Electric anticipates customer demand may approach or exceed historical peak levels beginning Sunday, February 1, 2026, and continuing thereafter.

While Lakeland Electric’s generation fleet remains operational, certain units will be constrained by environmental permit limits that restrict their ability to provide additional output during these unusually severe system conditions. Absent temporary relief, these constraints may limit Lakeland Electric’s ability to fully utilize available resources to meet customer demand and maintain reliable electric service, increasing the risk of firm load shedding.

In addition, the City of Lakeland owns and operates water and wastewater treatment facilities and other non-essential municipal facilities equipped with backup generation. These resources could be used to reduce electric demand during peak periods but are subject to emissions, run-time, and maintenance limitations under existing permits.

II. Relief Requested

(a) City-Owned Electric Generating Units

The City of Lakeland requests an emergency order authorizing Lakeland Electric to temporarily operate City-owned electric generating units in excess of applicable emissions or other permit limitations, to the extent necessary to maintain system reliability and prevent firm load shedding during this extreme cold weather event.

Operation under this authority would be limited to periods and operating parameters determined by Lakeland Electric to be necessary to protect public health and safety and ensure reliable electric service. Lakeland Electric will continue to exhaust all reasonably available operational and demand-side measures prior to operating any unit in a manner that exceeds permit conditions.

(b) City-Owned Backup Generation Resources

The City further requests authorization for Lakeland Electric to direct the operation of City-owned backup generation at water, wastewater, and other non-essential municipal facilities, notwithstanding emissions, run-hour, or maintenance limitations contained in applicable permits. These City-owned backup generation resources are also described in Exhibit A.

Temporary operation of these resources may result in limited exceedances of permitted emissions or run-time thresholds due to extended operation or constraints on emissions-control materials. Authorizing their operation during this emergency could materially reduce electric system load and help avoid firm customer outages.

To minimize adverse environmental impacts as set forth herein, this order would limit operation of generating units and City-owned backup generation resources to the times and within the parameters determined by Lakeland Electric, as necessary for grid reliability to avoid adverse health and safety impacts to customers from shedding firm customer load. Consistent with good utility practices, Lakeland Electric 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 generation resources at levels in violation of environmental laws.

The City of Lakeland and Lakeland Electric remain committed to environmental compliance and recognize the importance of applicable permit requirements. However, under the present circumstances, the immediate threat to public health and safety posed by widespread electric outages during prolonged extreme cold conditions outweighs the limited, temporary exceedances that would be authorized under this request. This request is narrowly tailored, time-limited, and intended solely to preserve electric system reliability during the emergency period, and allow only the exceedances that are necessary to ensure reliability during the limited timeframe of this request. Limiting the requested allowance to situations described above will ensure that the operation of the City's generating units and City-owned backup generation resources in excess of environmental permit limits will be a last resort to maintain grid

stability (including, as a last resort before declaring an Energy Emergency Alert (EEA) 3), thus minimizing any environmental impact to the greatest degree possible.

The City of Lakeland appreciates the Department of Energy's expedited consideration of this request and commits to respond promptly to any requests for additional information.

Respectfully,

Michael Beckham

Michael Beckham
General Manager, Lakeland Electric

Exhibit A
GENERATING UNITS AND CITY-OWNED BACKUP GENERATION RESOURCES

Table 2-1 Lakeland Electric Existing Generating Facilities													
Plant Name	Unit No.	Location	Unit Type ³	Fuel ⁴		Fuel Transport ⁵			Commercial In-Service Month/Year	Expected Retirement Month/Year	Gen. Max. Nameplate kW	Net Capability ²	
				Pri	Alt	Pri	Alt	Alt Fuel Days Use ¹				Summer MW	Winter MW
Charles Larsen Memorial	GT2*	16-17/28S/24E	GT	NG	DFO	PL	TK	NR	11/62	Unknown	11,250	10.0	14.0
	GT3*		GT	NG	DFO	PL	TK	NR	12/62	Unknown	11,250	9.0	13.0
	8		CA	WH	---	---	---	---	04/56	Unknown	30,000	29.7	29.7
	8		CT	NG	DFO	PL	TK	NR	07/92	Unknown	101,520	84.7	94.7
Plant Total											114.4	124.4	

¹LAK doesnot maintain records of the days the alternative fuel is available in reserve. ²Net Normal, * on Long term scheduled maintenance
³Net Normal
Source: Lakeland Energy Supply Unit Rating Group

Unit Type	Fuel Type	Fuel Transportation Method
CA Combined Cycle Steam Part	DFO Distillate Fuel Oil	PL Pipeline
CT Combined Cycle Combustion Turbine	WH Waste Heat	TK Truck
GT Combustion Gas Turbine	NG Natural Gas	
ST Steam Turbine		

Table 2-2 Lakeland Electric Existing Generating Facilities													
Plant Name	Unit No.	Location	Unit Type ³	Fuel ⁴		Fuel Transport ⁵			Commercial In-Service Month/Year	Expected Retirement Month/Year	Gen. Max. Nameplate kW	Net Capability	
				Pri	Alt	Pri	Alt	Alt Fuel Days Use ²				Summer MW	Winter MW
Winston Peaking Station	1-20	21/28S/23E	IC	DFO	---	TK	---	NR	12/01	Unknown	2,500 each	50.0	50.0
Plant Total												50.0	50.0
C.D. McIntosh, Jr.	D1	4-5/28S/24E	IC	DFO	---	TK	---	---	01/70	Unknown	2,600	2.5	2.5
	D2		IC	DFO	---	TK	---	---	01/70	Unknown	2,600	2.5	2.5
	GT1		GT	NG	DFO	PL	TK	NR	05/73	Unknown	26,640	17.0	19.0
	GT2		GT	NG	DFO	PL	TK	NR	06/20	Unknown	130,050	119.5	124.5
	5		CT	NG	---	PL	---	---	05/01	Unknown	292,950	234.0	280.0
	5		CA	WH	---	---	---	---	05/02	Unknown	135,000	118.0	118.0
	MREP 1-3		IC	NG	---	PL	---	---	01/25	Unknown	60,800	59.5	59.5
MREP 4-6	IC	NG	---	PL	---	---	12/24	Unknown	60,800	59.5	59.5		
Plant Total											612.5	665.5	
System Total												776.9	839.9

Unit Type	Fuel Type	Fuel Transportation Method
CA Combined Cycle Steam Part	DFO Distillate Fuel Oil	PL Pipeline
CT Combined Cycle Combustion Turbine	WH Waste Heat	TK Truck
GT Combustion Gas Turbine	NG Natural Gas	ST Steam
IC Internal Combustion		

LOCATION	SIZE (kW)	Fuel
Water		
Williams Water Treatment Plant	2,250	Diesel
Highlands Booster Station	400	Diesel
Southwest Booster Station	230	Diesel
Southeast Booster Station	150	Diesel
Combee Water Treatment Plant	1,750	Diesel
Northeast Wellfield	500	Diesel
Wastewater		
Glendale Wastewater Treatment Plant		
Sludge Thickening Bldg	500	Diesel
Blower Bldg	1,250	Diesel
Reuse Pumping Station	310	Diesel
Wetlands Pump Station East	600	Diesel
Wetlands Pump Station West	600	Diesel
Lab Bldg	175	Diesel
Maintenance Shop	150	Diesel
Influent Pump Station	500	Diesel
Electric Room	400	Diesel
Northside Wastewater Treatment Plant		
NGEN 01	674	Diesel
NGEN 02	460	Diesel
NGEN 03	460	Diesel
NGEN 04	449	Diesel
Wastewater Lift Stations		
L0410	500	Diesel
L0730	60	Diesel
L0790	125	Diesel
L0810	200	Diesel
L2310	300	Diesel
L2610	135	Diesel
L3425	150	Diesel
L3430	355	Diesel
L3440	150	Diesel
L3730	100	Diesel
L3770	80	Diesel
L3780	60	Diesel
L3781	40	Diesel
L3782	30	Diesel
L3810	62	Diesel
L4550	275	Diesel
L4610	125	Diesel
L4630	150	Diesel
L6010	800	Diesel
L6560	125	Diesel
L6620	150	Diesel
L6630	100	Diesel
L7220	300	Diesel
Total (KW)	16,180	
Total (MW)	16.18	

