UNITED STATES OF AMERICA
BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order TransAlta Centralia Generation	Order No. 202-26-44

MOTION TO INTERVENE, REQUEST FOR REHEARING, AND MOTION TO STAY BY STATE OF WASHINGTON

Pursuant to section 313 of the Federal Power Act (the Act), 16 U.S.C. § 825*l*, the State of Washington, by and through the Washington State Attorney General, Nicholas W. Brown, moves to intervene, seeks a stay, and requests that the Department of Energy (DOE) grant rehearing of Order No. 202-26-44 (September 11, 2026) (Centralia IV), attached hereto as Exhibit 133. Centralia IV extends for an additional 90 days Order No. 202-26-28 (June 12, 2026) (Centralia III), which extended Order No. 202-26-18 (Mar. 16, 2026) (Centralia II) for an additional 90 days, which itself extended for an additional 90 days Order No. 202-25-11 (Dec. 16, 2025) (Centralia I). Because the legal and factual issues here directly overlap and repeat the same matters as related to Centralia I, II, and III, Washington hereby incorporates by reference its requests for rehearing of Order No. 202-25-11, Order No. 202-26-18, and Order No. 202-26-28, including all arguments, exhibits, and other reference materials, and reasserts them herein as grounds for rehearing Centralia IV. Exs. 134, 135, 136.

I. INTRODUCTION

On December 16, 2025, DOE issued the Centralia I order to TransAlta Centralia Generation LLC directing that the Centralia Coal Plant (TransAlta Centralia or Centralia)

remain in operation as a coal facility. Centralia I was counterproductive to its own aims, failing to establish any actual emergency and threatening to derail the long-planned conversion of TransAlta Centralia into a modernized natural gas facility with greater capacity and more flexibility than the current aged coal facility. DOE extended the order first in March, again in June, and now again in September, quadrupling down to issue a fourth flawed emergency order for a situation that time has now confirmed is a non-emergency.

DOE should immediately withdraw Centralia IV. As with Centralia I, II, and III, the Centralia IV order is unlawful, internally inconsistent, misguided, and based on incorrect assertions about the Northwest's power infrastructure and operation. DOE again makes assertions of unfettered authority to usurp state and regional power planning based on generalized power planning concerns. This again violates the Act, which expressly limits DOE's authority to *actual* emergency situations involving war or the sudden and unexpected loss of power.

An emergency did not exist in December 2025, did not exist in March or June 2026, and does not exist now in September. Indeed, no emergency ever materialized, and the TransAlta Centralia plant has not been needed to run at any point. As a result, Centralia IV again fails to present any legitimate factual basis—let alone substantial evidence—to support its claim that maintaining Centralia as a coal-fired facility is necessary to "meet" any emergency. And, as with Centralia I, II, and III, Centralia IV is detrimental to the public interest by undermining the very grid stability it purports to protect in a way that will be enormously burdensome to the Northwest's rate payers. The longer DOE holds Centralia hostage for purely political aims, the greater the risk of delay becomes in converting this aging,

unreliable, and polluting plant to a more efficient and modernized source of power for the region. Washington calls on DOE to rescind Centralia IV.

II. STATEMENT OF ISSUES AND SPECIFICATIONS OF ERROR

Washington incorporates its statement of issues and specifications of error from its petitions for rehearing of Orders No. 202-25-11, Order No. 202-26-18, and Order No. 202-26-28. *See* Exs. 134, 135, 136. Washington submits the following additional statement of issues and specifications of error:

- Centralia III is arbitrary, capricious, and not based on substantial evidence because Centralia III's reliance on the North American Electric Reliability Corporation State of Reliability to establish an energy emergency is misplaced.

- Centralia III is arbitrary, capricious, and not based on substantial evidence because it ignores the comments of BPA, CAISO, Gridforce, and SPP in FERC proceedings that show that DOE's order is arbitrary and capricious and will harm ratepayers

III. MOTION TO INTERVENE AND INTERVENOR'S INTEREST

The State of Washington moves to intervene in this proceeding and become a party for purposes of Section 313*l* of the Act, 16 U.S.C. § 825*l*. *See* RCW 43.10.030(1). *See also City of Seattle v. McKenna*, 172 Wash. 2d 551, 259 P.3d 1087 (2011) (noting that RCW 43.10.030(1) grants the Attorney General discretionary authority to act in any forum "on a matter of public concern" (internal quotations and citations omitted)). The TransAlta Centralia Plant is located in the State of Washington, and the State is aggrieved by the Order in several ways.

First, Washington has a direct contractual interest in the retirement of Centralia on December 31, 2025. In 2011, the Washington Legislature passed the Coal-Fired Electric

Generation Facilities Bill, Senate Bill 5769. S.B. 5769, 62nd Leg., Reg. Sess. (Wash. 2011). That Act directed Centralia to comply with the state's greenhouse gas emission performance standards by the end of 2020 for its first boiler and the end of 2025 for the second. RCW 80.80.040(c). It also directed the Governor to enter into a Memorandum of Agreement with the owners of Centralia. RCW 80.80.100. The State and TransAlta signed the Memorandum of Agreement in 2011, which was amended in 2017 to specify that Centralia could continue to generate power, so long as it was not coal-fired power. Ex. 5; Ex. 6 at section 1.

The Memorandum of Agreement required Centralia to permanently cease coal power generation from one boiler in 2020, and the other boiler in 2025. Exs. 5, 6. In exchange for that commitment, the State of Washington confirmed that the facility met the greenhouse gas emissions performance standards and other environmental requirements of the State, guaranteed the ability of TransAlta to enter into long-term power contracts for the sale of electricity from Centralia, and promised to maintain sales and use tax exemptions for the plant. Ex. 5. The State of Washington kept those promises, sacrificing tax revenue and granting TransAlta flexibility with regard to operational controls in exchange for Centralia ceasing coal operations by the end of 2025.[1] Because the Order deprives Washington of the benefit of its bargain under the Memorandum of Agreement, Washington suffers distinct harms as a result of the Order.

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[1] *See, e.g.,* RCW 82.08.811 (exempting the sale of coal from the state Retail Sales Tax); RCW 82.12.811 (exempting coal from the state Use Tax); RCW 70A.65.080(7)(c) (exempting Centralia from the greenhouse gas limits of the Climate Commitment Act); RCW 19.405.030 (allowing Centralia to recover its decommissioning and remediation costs in rates).

Second, Washington has a direct regulatory interest in Centralia's retirement because continued coal-fired operations would directly violate state law as well as a regulatory order issued by the Department of Ecology. Centralia is subject to Washington's emissions performance standard (EPS) for baseload electric generation in the state, RCW 80.80.040. The EPS is essentially a carbon intensity standard, limiting the volume of greenhouse gas emissions that an electric generating facility may emit per megawatt-hour of power produced. RCW 80.80.040(1), (3). This standard cannot generally be met by coal-fired plants without employing carbon sequestration technology.[2] The application of this standard was delayed for TransAlta until the scheduled shutdown of its two boilers at the end of 2020 and 2025. RCW 80.80.040(3)(c) ("A coal-fired baseload electric generation facility in Washington that emitted more than one million tons of greenhouse gases in any calendar year prior to 2008 must comply with the lower of the following greenhouse gas emissions performance standard such that one generating boiler is in compliance by December 31, 2020, and any other generating boiler is in compliance by December 31, 2025: [referencing process for setting standard].").

TransAlta relied on the 2025 retirement of its last coal-fired boiler as its means of complying with Washington's emissions performance standard. Ex. 7 at 2, § D(a)(1) (2011 BART Order) ("The plant owner, the Governor's office, and environmental organizations

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[2] The emission performance standard is currently set at 876 GHG/MWh. WAC 173-407-130 (setting forth EPS standard in Ecology's EPS rules). *See* RCW 80.80.040(1) (providing procedures for setting standard); RCW 80.80.050 (setting out Washington Department of Commerce's role to set standard); WAC 194-26-020 (Washington Department of Commerce setting standard).

anticipate that compliance with this requirement will be accomplished by decommissioning the [coal-fired] units."). Further, the Washington Department of Ecology issued Centralia a regulatory order imposing Best Available Retrofit Technology ("BART") requirements pursuant to its authority under the Washington Clean Air Act and the visibility and regional haze programs of the Federal Clean Air Act. The BART order specifically requires TransAlta to "permanently cease burning coal" and decommission both coal-fired units at the plant by 2025. Ex. 7 at 4, condition 4; Ex. 8 at 3, condition 3 (2020 BART Order, Revision 2). Thus, operation of TransAlta's coal-fired boilers, without substantial investment in new emissions-lowering technology, will directly violate Washington's Emission Performance Standard and BART order.

Third, Washington residents would suffer health and environmental harms if Centralia IV results in operations at Centralia, with costs to the State resulting from the heightened burden on state-provided insurance and public hospitals. Coal operations at Centralia will increase air pollution in Washington, harm Washingtonians' health imposing direct harms on the State and its agencies, and impair visibility at Washington's iconic natural areas such as the Mount Rainer National Park. Ex. 10, ¶ 7 (Declaration of Gary Palcisko).

Fourth, if Centralia were to operate, these environmental harms would frustrate Washington State's regulatory interests, harm the State's public trust resources, and pose a financial burden on the State. For example, Centralia is the highest source of greenhouse gas emissions in Washington. Exs. 12, 13. By attempting to mandate the continued operation of the Centralia Coal Plant, Centralia IV will make it harder for Washington to meet its statutory greenhouse gas emissions reduction requirements. RCW 70A.45.020. And continued burning

of coal will also hinder Washington's investigation and cleanup of the site under the Model Toxics Control Act (MTCA). *See* Ex. 52, ¶ 16. Under MTCA, the Washington Department of Ecology is responsible for investigating contamination, developing cleanup action plans, and identifying potentially liable parties (PLPs) for sites contaminated with hazardous substances. *Id.* ¶ 4–14.

A series of investigations at Centralia found six hazardous substances in the soil, nine contaminants for groundwater, and nine substances in the sediment at the Site above MTCA cleanup levels. *Id.* ¶ 7. If Centralia were to operate, it would prolong the contamination of the Site, exacerbating the time and resources the State must expend to investigate and plan its cleanup. *Id.* ¶ 14. It would also cause continued aerial emissions of hazardous substances, which have the potential to settle on and contaminate thousands of properties and create thousands of potentially liable parties under MTCA. *Id.* ¶ 14. Determining liability and cleanup responsibility for so many sites is resource-intensive for the State. *Id.* Finally, the Centralia Coal Plant uses settling ponds containing byproducts from burning coal, many of which are also hazardous substances subject to MTCA. *Id.* ¶ 15. Centralia IV will require TransAlta to continue using the settling ponds, preventing the Washington Department of Ecology from performing cleanup of the ponds, and potentially posing risks related to groundwater contamination. *Id.*

Fifth, Washington's electricity grid will be less reliable because of Centralia IV. In addition to the direct interest in grid reliability to power state buildings, public schools, and

hospitals, Washington has a regulatory interest in maintaining grid reliability.[3] Centralia experiences extended periods of non-operation. In the years 2023–2025, the Centralia Plant Unit #2 shut down 29 times, 25 of which were forced outages. Ex. 11 ¶ 7. Additionally, when coal-powered generation facilities do shut down, they have a longer start-up time than natural-gas-powered facilities, which makes them less responsive to fluctuating energy demands. Ex. 14. This is especially true for "cold" startups, where the facility must start up after an extended period of nonactivity. Cold startups take longer than startups following a briefer outage where the facility components are still warm from recent operation. Ex. 11 ¶ 8. It took Centralia anywhere from 11 to 18 hours to reach its operational capacity during the six cold startups from the fourth quarter of 2024 through the third quarter of 2025. *Id.* Plus, because Centralia is likely overdue for maintenance, it could face more frequent shutdowns than in previous years. Ex. 11 ¶ 10–11.

This will be exacerbated by the apparent staffing shortages Centralia faces. Ex. 11 ¶ 12. Finally, aside from limited circumstances, Washington utilities are prohibited from purchasing power from coal plants after December 31, 2025. RCW 19.405.030. Because of these frequent shutdowns, the length of time needed to start up the plant, the uncertainties around maintenance and staffing, and the legal barriers to purchasing power from Centralia, coal operations at Centralia are less reliable, efficient, or economical than other alternatives.

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[3] The Washington Utilities and Transportation Commission (UTC) is tasked with regulating IOUs such that any services rendered are "adequate and efficient," RCW 80.28.010(2), (11); RCW 19.405.080(2)(a) (reporting requirements concerning reporting on meeting load, reliability standards, and resource adequacy); RCW 80.28.130 (granting UTC authority to order an electric utility to make improvements to their system to "secure adequate service or facilities").

However, Centralia IV will force ratepayers to pay for Centralia's operations rather than investing in alternatives, resulting in a loss of capacity and flexibility for Washington's electricity grid.

Sixth, Washington agencies, households, and businesses will likely pay higher electricity bills because of Centralia IV, and Washington has a regulatory interest in keeping electricity rates fair and affordable.[4] Under the most recent Power Purchase Agreement (PPA) which expired on December 31, 2025, the price from Centralia's coal is significantly higher than the wholesale energy market price, at $62.04 per MWh versus the wholesale market price of $54.32 per MWh. Ex. 41 ¶ 15. It is also unclear whether Centralia will be safe to operate. Recent inspections and the most recent quarterly report indicate that Centralia's pollution control technology requires maintenance or repairs. Ex. 11 ¶ 10–11. Further, recent staffing shortages may have led to the violations that Centralia was noticed for in December. Ex. 11 ¶ 12. TransAlta will likely have to expend resources to quickly hire and train new staff to operate the facility. As described below, TransAlta has twice sought to recover those costs from rates, which amount to tens of millions of dollars for the first two 90-day periods of Centralia I and II alone. By ordering the continued operation of TransAlta's Centralia Coal Plant, Centralia IV ensures that Washington ratepayers will see unreasonably higher electricity bills, in contradiction with Washington's statutory mandate to secure rates that are "just, fair, reasonable, and sufficient." RCW 80.28.010(1).

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[4] *See, e.g.,* RCW 80.28.010(1) (The UTC is also tasked with regulating IOUs in the public interest and ensuring rates for "any service rendered" are "just, fair, reasonable, and sufficient."); The Clean Energy Transformation Act requires utilities to achieve targets at the "lowest reasonable cost," RCW 19.405.040(6)(a)(i), –.050(3)(a), –.060(1)(c)(ii), –.080(2)(b).

IV. BACKGROUND

Washington incorporates the Background sections from its request for rehearing in Centralia I, Centralia II, and Centralia III, and provides the following additional background information for rehearing of Centralia IV. Exs. 134,135, 136.

A. DOE's Section 202(c) Orders and Renewals

Last year, motivated by a political agenda to boost the coal industry, and at the request of the coal-industry to prevent the planned retirement of coal-fired power plants, DOE began issuing emergency orders to keep retiring coal plants across the country in operation. *See* Exs. 137, 138 (a recently released letter confirmed that the 202(c) orders were pretextual, driven by a request from the coal industry to prevent the retirement of coal plants). DOE has now issued at least 27 section 202(c) orders to 7 coal facilities. In August 2025, one day before the first order was set to expire, DOE issued a second section 202(c) order requiring the Campbell coal plant in Michigan to remain on-line. Exs. 27, 58. DOE extended the order again in November 2025, a third time in February 2026, a fourth time in May 2026, and a fifth time in August 2026. Exs. 36, 101, 121, 139. Similarly, DOE extended its original May 2025 order issued to the Eddystone Generating Station in Pennsylvania in August 2025, November 2025, February 2026, May 2026, and August 2026. Exs. 28, 59, 63, 102, 122, 140. After the initial order in December 2025, DOE issued two renewal orders to the Craig Station coal facility in Colorado. Exs. 123, 124, 125. DOE also issued three total orders to both the F.B. Culley Generating Station and the Schahfer Generation Station coal plants in Indiana after their initial orders in December 2025. Exs. 132, 126, 127, 128, 129, 130. Finally, DOE issued a 202(c) order to Stanton Energy Center in Florida in June 2026, and renewed that order in September

2026. Exs. 141, 142. Across the country, DOE has demonstrated its commitment to keeping coal plants available to operate by finding "emergency conditions" that extend beyond a year in the case of Campbell and Eddystone.

DOE issued the first renewal order for Centralia on March 16, 2026, and the second on June 12, 2026. Exs. 100, 120. DOE issued the third renewal order on September 11, 2026. Ex. 133. The latest renewal order makes the same speculative claims about "periods of extreme weather" and potential long-term grid capacity issues and cites to the same sources as the previous renewal orders, only adding a new citation to NERC's June 2026 "State of Reliability" report. *Id.*

DOE's renewal order will exacerbate problems with Washington's grid by slowing the Centralia plant's conversion to natural gas. For example, TransAlta cannot demolish the existing cooling towers, a necessary step in the conversion process, if it's required to remain available to operate. Ex. 103 ¶ 6; Ex. 103–1. The first, second, and third orders also proved unnecessary—TransAlta was never needed or called on to operate during these first three emergency orders, even during a six-day outage by the largest non-hydroelectric generating facility in the state. Ex. 104 ¶¶ 3, 6; Ex. 131 ¶ 21; Ex. 143 ¶ 11; Ex. 151. U.S. Energy Information Administration generation data for Gridforce Energy Management, LLC, the Balancing Authority where TransAlta Centralia is located shows 0 MWh of coal generation for the duration of the Order. Ex. 143 ¶ 11, Figure 1.

B. FERC Cost Recovery Action

In April 2026, TransAlta filed an application to recover nearly $20 million under section 202(c) of the Federal Power Act for costs associated with complying with DOE's

Order from December 16, 2025, through March 16, 2026. Application for Cost Recovery Under 16 U.S.C. § 824a(c), Docket No. ER26-2422-000 (April 30, 2026) ["First Application for Cost Recovery"] at 1-2, 9. TransAlta filed a second cost recovery application for approximately $6.4 million, covering March 17, 2026 through June 14, 2026 in August 2026. Application for Cost Recovery Under 16 U.S.C. § 824a(c), Docket No. ER ER26-3437-000 (August 5, 2026) ["Second Application for Cost Recovery"] at 1, 8. TransAlta sought $6,395,348.07 in fixed costs for that period. *Id.* at 8. It also sought (1) variable charges of $35.90 per MWh, (2) environmental charges of $77.59 per MWh, (3) start-up costs of $736,677 per start, and (4) any other costs FERC deems appropriate to operate Centralia as directed by the Order. *Id.* at 9–10. Washington filed Motions to Intervene and Protest both applications. Exs. 144, 145.

Additionally, in its second FERC filing, TransAlta acknowledged that it would continue to incur costs for future section 202(c) orders and that it would file subsequent tariff sheets to recover those costs. Second Application for Cost Recovery at 11. TransAlta acknowledged that because it was slated to retire in December 2025, its ability to continue to operate "may require significant capital investment and maintenance work". *Id.* TransAlta identified specific maintenance costs that would begin accruing on September 2, 2026, at an estimated cost of $12.4 to $24.8 million. *Id.* at 12.

FERC issued an order on October 1, 2026 rejecting TransAlta's initial tariff filing on the narrow basis that "it fail[ed] to allocate costs based on the geographic scope of the emergency." Exs. 146 at 1, 18. However, FERC's order affirmed that TransAlta is entitled to recover costs incurred to keep Centralia available to operate per DOE's emergency order. *Id.*

at 17-18. While TransAlta has yet to file a new application for recovery, it is likely to do so following the guidance in FERC's order.

C. TransAlta Continues to Move Forward on its Natural Gas Conversion with Ecology

Prior to DOE's December section 202(c) order, TransAlta targeted late 2028 to begin commercial operations at the natural gas facility conversion that would replace its coal facility. Ex. 41 ¶ 6. The December 202(c) order required TransAlta to "take all measures necessary to ensure that Centralia Unit 2 is available to operate . . . ." Ex. 1 at 3. That effectively delayed, or at least made uncertain, TransAlta's natural gas conversion. Although TransAlta is still taking steps to move forward with the planned conversion, further 202(c) orders could significantly delay that process.

As detailed in Washington's last rehearing request, TransAlta has been working with the Department of Ecology to obtain the necessary environmental permits to convert to a natural gas facility. Ex. 136 at 36-38. As one step in that process, TransAlta will require a State Environmental Policy Act (SEPA) determination from Ecology before it can begin construction. On July 31, 2026, Ecology issued a Mitigated Determination of Non-Significance (MDNS) for TransAlta's planned conversion to natural gas. Ex. 147. The MDNS states that the planned conversion will not have a probable significant adverse impact on the environment, provided that TransAlta implements the conditions and mitigation measures identified in the MDNS. *Id*. The conditions and mitigation measures in the MDNS include compliance with greenhouse gas emissions requirements under the Climate Commitment Act, implementation of a clean energy grant program to further mitigate greenhouse gas emissions from the project, and the requirement to obtain and maintain regulatory approvals related to

stormwater, air discharges, building and construction, and emissions of volatile organic compounds. *Id*.

Ecology held a public comment period on the MDNS and Prevention of Significant Deterioration (PSD) permit from July 31, 2026 to September 15, 2026. Ex. 148 ¶ 4. Ecology also held a public hearing for the MDNS and PSD permit on September 14, 2026. *Id.* During the public comment period and hearing, Ecology received a total of about 65 public comments. *Id.* Ecology will review the public comments, develop comment response documents, and make any edits it deems necessary to the MDNS and PSD permit during October and November of 2026. *Id.* ¶ 5. PSD rules require Ecology to issue a decision on the PSD permit by August of 2027, but Ecology expects to issue a decision by early to mid-2027. WAC 173-400-730(2)(c)(ii); Ex. 148 ¶ 6. If Ecology makes any changes to the MDNS, it would likely issue a final MDNS before the end of 2027. Ex. 148 ¶ 6. If no changes are made, the version issued on July 31, 2026 will become final. *Id.* Regardless, TransAlta will not be able to begin any of the activities authorized by the MDNS and PSD permit if DOE continues to issue 202(c) orders.

D. The *People of the State of Michigan v. Department of Energy* Decision

One of the administration's first 202(c) orders targeted the Campbell coal plant in Michigan. Ex. 27. In 2022, after an administrative "contested case" process with dozens of intervenors, the owner of Campbell entered into a multi-party settlement agreement to retire the Campbell plant and obtain cleaner, more reliable resources that would increase generation capacity. Ex. 149 at 20 . Days before Campbell was scheduled to retire in May 2025, DOE issued a 202(c) order requiring it to stay available to operate. Ex. 27. The states of Michigan,

Illinois, and Minnesota sought rehearing and filed petitions for review of the emergency order in the D.C. Circuit. Ex. 149 at 4.

On September 11, 2026, the D.C. Circuit granted the petitions for review and vacated the 202(c) order requiring Campbell to operate. *Michigan v. United States Dep't of Energy*, No. 25-1159 (D.C. Cir. Sept. 11, 2026) (*Michigan*); Ex. 149 at 6–7. The court held that DOE could not circumvent Michigan's years-long plan to retire Campbell. *Id.* at 22. The court cited the plain language of section 202(c) and the structure of the Act in its determination that no emergency justified the Campbell 202(c) order. *Id.* at 5, 27–28. Specifically, the court interpreted the term "emergency" in the FPA, in light of its ordinary definition, as an "unforeseen occurrence or combination of circumstances which calls for immediate action or remedy." *Id.* at 27. In the context of a 202(c) order, that means an event requiring immediate federal action to ensure an adequate supply of electricity. *Id.* at 28. Additionally, the placement of section 202(c) after sections 202(a) and 202(b), which facilitate state planning and provide for federal action *at the request of states*, implies that 202(c) is meant to be the last alternative to respond to emergency electricity shortages—a "last resort." *Id.* at 4, 13, 14, 16.

Further, the court found that DOE's use of 202(c) to order coal plants to continue operating contradicted the states' authority to oversee electricity generation and power planning and was inconsistent with the past use of section 202(c) authority. *Id.* at 5–6. The federal government has only used section 202(c) in response to emergencies caused by extreme weather events, war, and other unplanned short-term outages of specific generation units – until now. *Id.* at 18. In addition to the text, the structure of the Act, and the traditional roles of the state and federal government in long-term energy planning, "[t]he historical uses

of section 202(c) further reinforce its limited scope." *Id.* at 35. In short, the court held that DOE unequivocally exceeded its statutory authority and vacated its 202(c) order requiring Campbell to stay online. *Id.* at 39.

V. REQUEST FOR REHEARING

In addition to the grounds laid out in Washington's request for rehearing in Centralia I, Centralia II, and Centralia III, fully incorporated as set out herein, Washington provides the following additional grounds for rehearing of Centralia IV. Exs. 134, 135, 136.

A. The NERC 2026 State of Reliability Report does not Establish an Emergency

DOE again cites a report out of context and with complete disregard to its underlying conclusions to justify its ongoing emergency finding. The NERC 2026 State of Reliability (SOR) Report cited in the Order is a backward-looking report that focuses on performance during the prior calendar year. Ex. 150 at v; Ex. 143 ¶ 5. DOE's Order relies on the SOR in support of reliability concerns related to large-load integration, shoulder season challenges, and localized operating stress. Ex. 133 at 6; Ex. 143 ¶ 4. But the Order fails to acknowledge that the SOR reliability concerns largely do not pertain to or impact the Northwest. The large-load integration concerns stemmed from customer-initiated load shedding events in the Eastern Interconnection and Texas—far outside the reach of TransAlta Centralia. Ex. 143 ¶ 8. The shoulder season challenges references are entirely based on events that occurred in New Mexico and Louisiana. Ex. 143 ¶ 6. Similarly, the Order cites to the SOR's discussion of localized operating stress as a justification for an emergency in the Northwest, yet the SOR does not specifically identify the Northwest or the Balancing Authority where TransAlta Centralia is located. Ex. 143 ¶ 7.

Reliability challenges in one region do not translate to the same challenges across the nation. DOE's reliance on the SOR to justify an emergency in the Northwest is misplaced at best. In fact, the SOR actually found the Western Interconnection to be maintaining stable trends with the risk index being "the lowest among the five years analyzed." Ex. 150 at 72; Ex. 143 ¶ 9. The SOR's only noted reliability concern in the Western Interconnection region was related to a transmission outage—a problem which cannot be solved by increased generation. Ex. 150 at 17-18; Ex. 143 ¶ 10. Therefore, DOE's reliance on the SOR is misplaced and does not establish an emergency.

B. TransAlta's Second Application for Cost Recovery Shows that DOE's Order is Arbitrary and Capricious, and Will Harm Ratepayers

As anticipated, TransAlta again applied for cost recovery from FERC for the second 202(c) order. Specifically, TransAlta sought $6,395,348.07 in fixed costs for the period of March 17, 2026, through June 14, 2026. Second Application for Cost Recovery at 8. Previously, Washington explained that requiring customers to pay for the 202(c) orders directed at TransAlta would harm ratepayers and reinforce that the order was arbitrary and capricious. Ex. 136 at 45-49. So too with Centralia IV.

As Washington has stated extensively in response to each 202(c) order, there is no emergency warranting Centralia's continued operation as a coal facility. As a result, TransAlta has sat idle for 10 months. Ex. 104 ¶ 3, 6; Ex. 131 ¶ 21; Ex. 143 ¶ 11; Ex. 151. TransAlta was neither needed nor called upon to operate, but nonetheless incurred tens of millions of dollars in maintenance costs over the first two emergency orders alone. First Application for Cost Recovery; Second Application for Cost Recovery. The fact that ratepayers will have to foot that bill shows that DOE's 202(c) order is plainly unreasonable.

C. The *Michigan* Decision Makes Clear That Power Planning Concerns are Insufficient to Establish an Emergency Under Section 202

The recent *Michigan* decision establishes that an "emergency" only exists to justify the use of a 202(c) order if immediate response is required by DOE to avoid an acute risk to reliability. Ex. 149 at 27. This rehearing request, and the arguments incorporated from Washington's prior rehearing requests, show that there is no genuine emergency that requires immediate action from DOE to prevent an unacceptable risk to reliability. The Order's reliance on non-emergency conditions is insufficient for DOE to invoke its emergency section 202(c) authority. Washington therefore requests that DOE immediately withdraw the Order.

VI. REQUEST FOR STAY

Washington State further moves DOE for a stay of the Order until judicial review has concluded. 18 C.F.R. § 385.212. DOE has the authority to issue a stay under the Administrative Procedure Act where "justice so requires." 5 U.S.C. § 705.

To determine whether to grant a request for stay, agencies consider: (1) whether the requesting party 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. *See Nken v. Holder*, 556 U.S. 418, 434, 436 (2009); *Ohio v. EPA*, 603 U.S. 279, 291 (2024); *see, e.g., Midcontinent Indep. Sys. Operator, Inc.*, 184 FERC ¶ 61,020, P 41 (2023); *ISO New Eng. Inc.*, 178 FERC ¶ 61,063, 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).

A. Washington State Will Suffer Irreparable Injury Without a Stay

A stay is necessary to prevent irreparable harm to Washington State caused by Centralia IV. Injuries 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) (identifying that, absent a stay, options for "meaningful judicial review would be effectively foreclosed").

Economic injury is irreparable only 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)). 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." *Amoco Prod. Co. v. Vill. of Gambell*, 480 U.S. 531, 545 (1987).

Centralia IV imposes costs on Washington ratepayers that may not be recoverable through future litigation and would not have otherwise been expended absent the Centralia IV order. Assuming TransAlta complies with Centralia IV,[5] it will expend considerable costs preparing the plant for refiring—if the plant is idle but available to operate *or* actively producing coal-fired power. *See supra* Sections IV.B., V.B.,. TransAlta will continue to generate staffing and overhead expenses under either scenario. Firing up the plant and transmitting electricity will further increase expenses. And plainly, coal is more expensive. Ex. 41 at ¶ 15 ("Under its current Purchase Power Agreement (PPA), the energy price from

[5] There is no indication that TransAlta will not comply with the Order.

Centralia's coal is significantly higher than the wholesale energy market price. Specifically, under the current contract, Puget Sound Energy pays $62.04 per MWh, while the wholesale market price is $54.32 per MWh."). Centralia IV again directs TransAlta to recover its expenses through a FERC tariff revision. Ex. 133 at 9; 16 U.S.C. § 824a(c). Neither Centralia IV nor the statute identify a mechanism for "corrective relief" should Centralia IV be found unlawful. As there is no clear recourse to recovering these costs should Washington State prevail in its challenge, a stay pending judicial review is necessary to protect ratepayers from unwarranted energy cost increases.

As described in the Rehearing Request, Washington residents will suffer environmental health and environmental harms if the Centralia IV Order results in operations at Centralia. TransAlta's Centralia Coal Plant was a significant source of particulate matter, sulfur dioxide, and nitrogen oxides. Ex. 10 ¶ 7. Those emissions are known to adversely impact human health. Based on estimates from the EPA's CO-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA), the failure to cease operations at Centralia will contribute to an estimated 9-13 premature deaths, 3 nonfatal heart attacks, 53 cases of asthma onset, and $140-210 million in health care costs and lost economic activity in Washington annually. Ex. 10 ¶ 10. Further, Centralia is the highest source of greenhouse gas emissions in Washington. Exs. 12,13. A local clean air agency issued Centralia two notices of violation for exceeding emissions limits in December 2025. Ex. 11 ¶ 12. Emissions are expected to be even higher if Centralia cannot operate at a lower load or make necessary repairs, or cease operations entirely as it had planned to do prior to DOE's orders. Ex. 11 ¶ 11. Because the environmental injury to Washington State and its residents cannot be

adequately remedied and may be permanent or long duration and is sufficiently likely, a stay pending judicial review is necessary.

B. A Stay Would Not Substantially Harm Other Parties

No parties would be harmed by a stay of Centralia IV because no emergency exists and the Centralia IV order was never needed to begin with. As detailed above, an order under 202(c) must be limited to circumstances that require immediate response by DOE to avoid an acute risk to reliability. *See supra* Section V.C. Centralia IV again provides no evidence to support a claim of an imminent emergency and references potential future grid unreliability that does not require immediate action from DOE. The State supplies substantial evidence to support the absence of an energy emergency. Because no current emergency exists, no other party could be harmed. Not forcing the deployment of a coal plant that is not needed harms no one. A stay would not disrupt the local energy market or impair the provision of electricity to customers.

C. A Stay is in the Public Interest

Centralia IV is contrary to the public interest. A stay will prevent any potential harm to the public that will be caused by Centralia IV. Principally, Centralia IV fails to meet the public interest standard under the Act DOE relies upon, 16 U.S.C. § 824a(c)(1), in bringing Centralia IV. *See* Centralia I Rehearing Request VI.D.2. Further, if a true energy emergency existed, the public interest would not be served by an aging, unreliable coal plant that requires 12–18 hours to start up. Ex. 11 ¶ 7, 8. Centralia IV has the potential to throw the regional energy market into short-term and long-term uncertainty, both of which could have adverse

consequences for energy users—the public. *See* Ex. 134 at VI.E.1. A stay is in the public interest.

VII. CONCLUSION

For the reasons set forth above, Washington respectfully requests that DOE grant intervention, grant rehearing, and rescind Centralia IV in its entirety.

Dated this 8th day of October, 2026.

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State of Washington

Request for Rehearing of Order No. 202-26-44

Index of Exhibits

No.	Exhibit Name	Document Name	URL
Centralia I			
1	DOE Order No. 202-25-11	Department of Energy (DOE), Washington DC 20585, Order No. 202-25-11 (Dec. 16, 2025)	
2	NERC 2025–2026 Winter Reliability Assessment	North American Electric Reliability Corporation, 2025–2026 Winter Reliability Assessment (Nov. 2025)	
3	E3 Slide Deck	Resource Adequacy and the Energy Transition in the Pacific Northwest: Phase 1 Results, dated September 22, 2025	
4	DOE Resource Adequacy Report	DOE Resource Adequacy Report, Evaluating the Reiliability and Security of the U.S. Electric Grid (July 2025)	

No.	Exhibit Name	Document Name	URL
5	Memorandum of Agreement	Memorandum of Agreement, TransAlta-State of Washington (fully executed) (Dec. 23, 2011)	
6	2017 Amended Memorandum of Agreement	First Amendment to Memorandum of Agreement, TransAlta-State of Washington (fully executed) (Jul. 13, 2017)	
7	2011 BART Order	Dep't of Ecology Administrative Order, First Revision: Order No. 6426 (Dec. 13, 2011)	
8	2020 BART Order	Dep't of Ecology Administrative Order, Second Revision: Order No. 6426 (Jul. 29, 2020)	
9	Technical Support Data-2020 BART Order	Dep't of Ecology Technical Support Document for Second BART Order Revision, TransAlta Centralia Generation Plant (July 2020)	

No.	Exhibit Name	Document Name	URL
10	Palcisko Declaration	Declaration of Gary Palcisko in Support of Request for Rehearing by State of Washington	
10-1	COBRA Data Coal v. Cease Operations	Total Health Benefits, Lewis County, Washington	
10-2	COBRA Data Coal v. Natural Gas	Total Health Benefits, Lewis County, Washington	
10-3	2023 Emissions Inventory	2023 Emissions Inventory	
11	Lamoreaux Declaration	Declaration of Clinton Lamoreaux in Support of Request for Rehearing by State of Washington	
11-1	TransAlta Centralia Title V Quarterly Report First Quarter 2025	Title V Report Certification Form, TransAlta Centralia Generation LLC, First Quarter, Jan. 1 - March 31, 2025	

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11-2	TransAlta Centralia Title V Quarterly Report Second Quarter 2025	Title V Report Certification Form, TransAlta Centralia Generation LLC, Second Quarter, April 1-June 30, 2025	
11-3	TransAlta Centralia Title V Quarterly Report Third Quarter 2025	Title V Report Certification Form, TransAlta Centralia Generation LLC, Third Quarter, Jul. 1 – Sep. 30, 2025	
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11-6	TransAlta Centralia Title V Quarterly Report Third Quarter 2024	Title V Report Certification Form, TransAlta Centralia Generation LLC, Third Quarter, Jul. 1 – Sep. 30, 2024	

No.	Exhibit Name	Document Name	URL
11-7	TransAlta Centralia Title V Quarterly Report Fourth Quarter 2024	Title V Report Certification Form, TransAlta Centralia Generation LLC, Fourth Quarter, Oct. 1 – Dec. 31, 2024	
11-8	TransAlta Centralia Title V Quarterly Report First Quarter 2023	Title V Report Certification Form, TransAlta Centralia Generation LLC, First Quarter, Jan. 1 – Mar. 31, 2023	
11-9	TransAlta Centralia Title V Quarterly Report Second Quarter 2023	Title V Report Certification Form, TransAlta Centralia Generation LLC, Second Quarter, Apr. 1 – Jun 30, 2023	
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11-11	TransAlta Centralia Title V Quarterly Report Fourth Quarter 2023	Title V Report Certification Form, TransAlta Centralia Generation LLC, Fourth Quarter, Oct. 1 – Dec. 31, 2023	

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11-12	Photograph of opacity readings	Photograph of opacity readings on Oct. 23, 2025	
11-13	Centralia Plant's 2022 U2 Boiler Tune-up Report	TransAlta Centralia U2 Boiler, 40 CFR 63 DDDDD Tune-Up Report (Oct. 3, 2022)	
11-14	Notice of Violation No. 10642, TransAlta	Southwest Clean Air Agency, Notice of Violation, No. 10643, TransAlta, Oct. 23, 2025	
11-15	Notice of Violation No. 10643, TransAlta	Southwest Clean Air Agency, Notice of Violation, No. 10643, TransAlta, Jan 11, Mar. 4, Jun. 6, Jun. 11, Aug. 26, 2025	
12	Top 10 Stationary Sources of GHG Emissions in WA – 2022	Dep't of Ecology Data Base: Top 10 Stationary Sources of Greenhouse Emissions in Washington (2022)	

No.	Exhibit Name	Document Name	URL
13	2023 EPA Top CO2 Emissions	U.S. Env't Prot. Agency, Greenhouse Gas Reporting Program (GHGRP), Top Washington Greenhouse Gas emissions sources for 2023, *GHGRP State and Tribal Fact Sheet* (last visited Jan. 6, 2026)	https://www.epa.gov/ghgreporting/ghgrp-state-and-tribal-fact-sheet
14	U.S. Energy Information – Start Up	U.S. Energy Information Administration, Owen Comstock, *About 25% of U.S. power plants can start up within an hour* (Nov. 19, 2020)	https://www.eia.gov/todayinenergy/detail.php?id=45956)
15	Plant Job Underway	Centralia Daily Chronicle, *Plant Job Underway* (Jun. 14, 1968)	
16	2021 Title V Air Operating Permit	TransAlta Centralia Generation, LLC, Centralia Plant, Air Operating Permit SW-98-8-R5A, Southwest Clean Air Agency (Sep. 22, 2021)	

No.	Exhibit Name	Document Name	URL
17	2021 Title V Air Operating Permit - Basis Statement		
18	U.S. Energy Information Administration, Form EIA-860, Schedule 3: Generator Data (2024) (2024 Form EIA-860)		https://www.eia.gov/electricity/data/eia860/
19	2022 Visibility SIP	Washington Dep't of Ecology, Air Quality Program, *State Implementation Plan Revision, Second Regional Haze Plan* (2018 – 2028) (Jan. 2022)	
20	TransAlta News Release Announcing Coal to Gas Conversion Project	TransAlta, Alberta Calgary, News Release, *TransAlta Signs Long-Term Agreement for 700 MW at Centralia Facility Enabling Coal to Natural Gas Conversion* (Dec. 9, 2025)	https://transalta.com/newsroom/transalta-signs-long-term-agreement-for-700-mw-at-centralia-facility-enabling-coal-to-natural-gas-conversion/

No.	Exhibit Name	Document Name	URL
21	TransAlta Permit Application	TransAlta Centralia Generation, LLC, *Prevention of Significant Deterioration Permit Application* (Dec. 2025)	
22	Letter Re: Summary of the 2025 Long-term Resource Adequacy Meeting	Brian Rybarik, WA Utilities and Transportation Commission, Jennifer Grove, WA Dep't of Commerce, *Re: Summary of the 2025 Long-term Resource Adequacy Meeting* (Nov. 19, 2025)	
23	2025 DOE 202(c) Orders	2025 DOE 202(c) Orders	https://www.energy.gov/ceser/2025-doe-202c-orders
23-1	Order (Dec. 14, 2000)	U.S. Dep't of Energy, Order Pursuant to Section 202(c) of the Federal Power Act (Dec. 14, 2000) (California Energy Crisis in 2000)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority

No.	Exhibit Name	Document Name	URL
23-2	DOE Order No. 202-05-1 (Sep. 8, 2005) (Hurricane Rita)	DOE Order No. 202-05-1 (Sep. 8, 2005) (Hurricane Rita)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-3	DOE Order No. 202-05-2 (Sep. 8, 2005)	DOE Order No. 202-05-2 (Sep. 8, 2005) (Hurricane Rita)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-4	DOE Order No. 202-08-1 (Sep. 14, 2008)	DOE Order No. 202-08-1 (Sep. 14, 2008) (Hurricane Ike)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-5	DOE Order No. 202-20-1 (Aug. 27, 2020)	Ex. 23-9 (DOE Order No. 202-20-1 (Aug. 27, 2020) (Hurricane Laura)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-6	DOE Order No. 202-20-2 (Sep. 6, 2020)	DOE Order No. 202-20-2 (Sept. 6, 2020) (extreme heat in California)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-7	DOE Order No. 202-21-1 (Feb. 14, 2021)	DOE Order No. 202-21-1 (Feb. 14, 2021) (extreme cold)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-8	DOE Order No. 202-21-2	DOE Order No. 202-21-2) (extreme heat, wildfires and drought in California)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority

No.	Exhibit Name	Document Name	URL
23-9	DOE Order No. 202-22-1	DOE Order No. 202-22-1 (extreme heat, wildfires and drought in California)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-10	DOE Order No. 202-22-2	Exs. 23-13 and 23-14 (DOE Order Nos. 202-22-1 & 2 and amendments) (same)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-11	DOE Order No. 202-22-3 (Dec. 23, 2022)	DOE Order No. 202-22-3 (Dec. 23, 2022) (extreme cold)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-12	DOE Order No. 202-22-4 (Dec. 24, 2022)	DOE Order No. 202-22-4 (Dec. 24, 2022) (extreme cold)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-13	DOE Order No. 202-24-1 (Oct. 9, 2024)	Ex. 23-20 (DOE Order No. 202-24-1 (Oct. 9, 2024)) (Hurricane Milton)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-14	DOE Order No. 202-05-3 (Dec. 20, 2005)	DOE Order No. 202-05-3 (Dec. 20, 2005) (Mirant, DC)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-15	DOE Order No. 202-17-1	DOE Order No. 202-17-1 (GRDA)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority

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23-16	DOE Order No. 202-17-2	DOE Order No. 202-17-2 (Yorktown Power Station)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
23-17	DOE Order No. 202-17-4 (Sept. 14, 2017)	DOE Order No. 202-17-4 (Sept. 14, 2017) (Yorktown Power Station – extension)	https://www.energy.gov/ceser/does-use-federal-power-act-emergency-authority
24	Grand River Dam Authority Request for Emergency Order	Daniel S. Sullivan, Grand River Dam Authority, *Re: Request for Emergency Order Pursuant to Section 202(c) of the Federal Power Act* (April 11, 2017)	https://www.energy.gov/sites/default/files/2017/05/f34/GRDA%20public%20202%28c%29%20letter.pdf
25	Wagner Order No. 202-25-6	U.S. Dep't of Energy, Order No. 202-25-6 (Jul 28, 2025)	
26	Puerto Rico Electric Power Authority, Order No. 202-25-1	U.S. Dep't of Energy, Order No. 202-25-1 (May 16, 2025)	
27	Campbell Order	U.S. Dep't of Energy, Order No. 202-25-3 (May 23, 2025)	https://www.energy.gov/sites/default/files/2025-05/Midcontinent%20Independent%20System%20Operator%20%28MISO%29%20202%28c%29%20Order_1.pdf https://perma.cc/Q7P7-TDTX

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28	Eddystone Order	U.S. Dep't of Energy, Order No. 202-25-4 (May 30, 2025)	https://perma.cc/PS3M-6CJA
29	Trump Admin Ordered Coal Plan Stay Open	Ella Nilsen, CNN, *The Trump Admin Ordered a Coal Power Plant to Stay On Past Retirement. Customers in 15 States Will Foot the Bill* (June 6, 2025)	https://www.cnn.com/2025/06/06/climate/michigan-coal-plant-energy-cost-wright
30	CMS Energy Quarterly Report	U.S. Securities and Exchange Commission, Form 10-Q, *Quarterly Report for CMS Energy Corp.* (Jul. 31, 2025)	https://www.sec.gov/ix?doc=/Archives/edgar/data/0000201533/000081115625000071/cms-20250630.htm
31	Trump Administration Forcing Coal Plants to Stay Open	NRDC, *Trump Administration's DOE Is Forcing Coal Plants to Stay Open. Michigan Is the First Target* (June 16, 2025)	https://www.nrdc.org/bio/derrell-e-slaughter/trump-administrations-doe-forcing-coal-plants-stay-open-michigan-first

No.	Exhibit Name	Document Name	URL
32	U.S. Dep't of Energy Fact Sheet	U.S. Dep't of Energy, *Fact Sheet: The Department of Energy's Resource Adequacy Report Affirms The Energy Emergency Facing The U.S. Power Grid* (2025)	https://www.energy.gov/sites/default/files/2025-07/DOE_Fact_Sheet_Grid_Report_July_2025.pdf https://perma.cc/YLX7-8G7T
33	Press Release Dep't of Energy U.S. Grid Report	Press Release, U.S. Dep't of Energy, *Department of Energy Releases Report on Evaluating U.S. Grid Reliability and Security* (July 7, 2025)	https://www.energy.gov/articles/department-energy-releases-report-evaluating-us-grid-reliability-and-security https://perma.cc/8TEJ-AGH6
34	Campbell Rehearing Order	U.S. Dep't of Energy, Order No. 202-25-3B, Order Addressing Arguments Raised on Rehearing (Sep. 8, 2025	

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35	August 6, 2025 State Request for Rehearing	Before the U.S. Dep't of Energy, In Re: Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid, July 2025, Motion to Intervene and Protective Request for Rehearing (Aug. 6, 2025)	
35-1	August 6 Rehearing Request Exhibit A	North American Electric Reliability Corp (NERC) *Interregional Transfer Capability Study (ITCS)*, Final Report, Nov. 2024	
35-2	August 6 Rehearing Request Exhibit B	GridLab Analysis: Department of Energy Resource Adequacy Report (July 15, 2025)	
35-3	August 6 Rehearing Request Exhibit C	New York University School of Law, Institute for Policy Integrity, *Enough Energy A Review of DOE's Resource Adequacy Methodology* (July 2025)	

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35-4	August 6 Rehearing Request Exhibit D	Nicholas Institute for Energy, Environment & Sustainability, *Rethinking Load Growth* (2025)	
35-5	August 6 Rehearing Request Exhibit E	London Economics Internat'l, *Uncertainty and Upward Bias Are Inherent in Data Center Electricity Demand Projections* (Jul 7, 2025)	
35-6	August 6 Rehearing Request Exhibit F	Grid Strategies, *Resource Adequacy Value of Interregional Transmission* (Jun. 2025)	
36	Second Campbell Order	U.S. Dep't of Energy, Order No. 202-25-9 (Nov. 18, 2025)	
37	Schahfer Order	U.S. Dep't of Energy, Order No. 202-25-12 (Dec. 23, 2025)	
38	Culley Order	U.S. Dep't of Energy, Order No. 202-25-13 (Dec. 23, 2025)	

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39	PJM Manual	Capacity Market & Demand Response Operations, *PJM Manuel 18: PJM Capacity Market* (Effective Date: Jul. 23, 2025)	
40	Eddystone Request for Rehearing	Before the U.S. Dep't of Energy, Order No. 202-25-4, Motion to Intervene and Request for Rehearing	
41	Moriyasu Declaration	Declaration of Callahan Moriyasu in Support of Request for Rehearing by State of Washington	
41-1	Historic Trends in Energy Use	Northwest Power and Conservation Council, *Historic Trends in Energy Use*	
41-2	Northwest Heat Wave	U.S. Energy Information Administration, *Northwest heat wave leads to record levels of summer electricity demand* (Aug. 23, 2017)	

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41-3	Ancillary Services Definitions and Capability Study	GE Energy Consulting, Ancillary Services Definitions and Capability Study (Dec. 2012)	
41-4	Optimizing Reserves	Electricity Advisory Committee, *Optimizing Reserves* (Oct. 2019)	
41-5	Historical Data	Bureau of Reclamation, Historical Data Access, Grand Coulee Dam (2020-2025)	https://www.usbr.gov/pn/hydromet/arcread.html
41-6	Washington Water Conditions	USGS Water Data for the Nation, *Washington Water Conditions* (Dec. 31, 2025)	
41-7	Water Management Data	U.S. Army Corps of Engineers, *Water Management Data* (Dec. 31, 2025)	
41-8	Grand Coulee Dam Levels Dec. 2025	U.S. Army Corps of Engineers, Water Manage-ment Data, Grand Coulee Dam, Pacific Northwest Region, Dec. 2025	

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41-9	Chief Joseph Dam Levels Dec. 2025	U.S. Army Corps of Engineers, Water Management Data, Chief Joseph Dam, Pacific Northwest Region, Dec. 2025	
41-10	Lower Granite Lock and Dam Levels Dec. 2025	U.S. Army Corps of Engineers, Water Management Data, Lower Granite Lock and Dam, Walla Walla District, Dec. 2025	
41-11	Little Goose Lock and Dam Levels Dec. 2025	U.S. Army Corps of Engineers, Water Management Data, Little Goose Lock and Dam, Walla Walla District, Dec. 2025	
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41-13	Ice Harbor Lock and Dam Levels Dec. 2025	U.S. Army Corps of Engineers, Water Management Data, Ice Harbor Lock and Dam, Walla Walla District, Dec. 2025	

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41-14	McNary Lock and Dam Levels Dec. 2025	U.S. Army Corps of Engineers, Water Management Data, McNary Lock and Dam, Pacific Northwest Region, Dec. 2025	
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41-19	Wanapum Dam Levels, Dec. 2025	U.S. Army Corps of Engineers, Water Manage-ment Data, Wanapum Dam, Pacific Northwest Region, Dec. 2025	
41-20	Rock Island Dam Levels Dec. 2025	U.S. Army Corps of Engineers, Water Manage-ment Data, Rock Island Dam, Pacific Northwest Region, Dec. 2025	
41-21	NOAA NWS Three Month Outlook	NOAA, Nat'l Weather Service, *Three-Month Outlooks*, Official Forecasts Jan-Feb-Mar 2026	
41-22	Centralia Coal PPA (R)	Puget Sound Energy, Docket UE-250747, Attachment B (Impact of portfolio updates), *Sheet "Centralia Coal PPA(R)"* (Oct. 1, 2025)	
41-23	E3 NW RA Data for Washington	E3, Greater Northwest System Metrics 2025–2030	

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42	Press Release Re: Executive Order	U.S. Dep't of Energy, *Energy Secretary Ensures Washington Coal Plant Remains Open to Ensure Affordable, Reliable and Secure Power Heading into Winter* (Dec. 17, 2025)	
43	Promises Made Promises Kept	U.S. Dep't of Energy, *Promises Made, Promises Kept, Unleashing the Golden Era of Energy Dominance and Lowering Prices* (Dec. 18, 2025)	
44	Executive Order 14156	Administration of Donald J. Trump, 2025, Executive Order 14156-Declaring a National Energy Emergency (Jan. 20, 2025)	
45	E2 Clean Economy Works: Nov. 2025 Analysis	Michael Timberlake, E2 Economy + Environment, Clean Economy Works: November 2025 Analysis (Dec. 12, 2025)	

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46	Energy Department Announces Termination of 223 Projects	U.S. Dep't of Energy, *Energy Department Announces Termination of 223 Projects, Saving Over $7.5 Billion* (Oct. 2, 2025)	
47	Archive of Energy Reliability and Resilience	U.S. Dep't of Energy, Office of Energy Efficiency & Renewable Energy, *Energy Reliability and Resilience*	
48	Dep't of Energy Response to State Rehearing Request of August 6	U.S. Dep't of Energy, *Re: August 6, 2025 Submission* (Sep. 5, 2025)	
49	Gomez Declaration	Declaration of David C. Gomez in Support of Request for Rehearing by State of Washington	
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50-2	2025 Avista Electric Integrated Resource Plan	Avista, *Electric Integrated Resource Plan* (2025)	
50-3	Puget Sound Energy 2021 Integrated Resource Plan	Puget Sound Energy, *2021 PSE Integrated Resource Plan,* Chapters 1-9 (Apr. 2021)	
50-4	Letter Re: Summary of the 2025 Winter Preparedness Resource Adequacy Meeting	Brian Rybarik, WA Utilities and Transportation Commission, Jennifer Grove, WA Dep't of Commerce, *Re: Summary of the 2025 Winter Preparedness Resource Adequacy Meeting* (Dec. 31, 2025)	

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50-5	Jan 2024 Month In Review	Nat'l Weather Service, Pendleton OR, *The Month In Review, January 2024*	
50-6	WRAP Assessment of January 2024	WRAP, *Assessment of January 2024 Cold Weather Event*	
50-7	Reliability Coordinator Procedure, No. RC-410	California ISO, RC West, Reliability Coordinator Procedure, RC0410 (May 1, 2025)	
50-8	Western Energy Imbalance Market (WEIM)	Western Energy Markets	https://www.westernenergymarkets.com/western-energy-imbalance-market-weim
50-9	CAISO WEIM Fact Sheet	California Independent System Operator (CAISO) Fact Sheet, *Western Energy Imbalance Market* (WEIM)	https://www.caiso.com/Documents/western-energy-imbalance-market-fact-sheet.pdf
50-10	Pennington WRAP Area Map	David Pennington, WPP, Western Resource Adequacy Program (WRAP) Area Map (last modified Oct. 31, 2025)	https://www.westernpowerpool.org/news/wrap-area-map

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50-11	Avista Investor Overview	Avista, *Better energy for life*, Investor overview	https://investor.avistacorp.com/
50-12	RC West California ISO	California ISO, RC West	https://www.caiso.com/market-operations/products-services/rc-west
51	Nightingale Declaration	Declaration of Joel Nightingale in Support of Request for Rehearing by State of Washington	
51-1	Testimony of Ronald J. Roberts, RJR-1T	Washington Utilities and Transportation Commission, Docket Nos. UE-240004 and UG-240005, Prefiled Direct Testimony of Ronald J. Roberts (Feb. 15, 2024)	
51-2	Winter Reliability and Electric-Gas Coordination Slides for WUTC Resource Adequacy Meeting	Zapotocky, Electric Reliability & Security for the West, *Winter Reliability and Electric-Gas Coordination*; North American Electric Reliability Corporation (NERC), *NERC's Winter Reliability Assessment* (Nov. 4, 2025)	

No.	Exhibit Name	Document Name	URL
51-3	Short-Term Energy Outlook US EIA	U.S. Energy Information Administration, *Short-Term Energy Outlook* (Dec. 2025)	https://www.eia.gov/outlooks/steo/
51-4	Levelized Costs of New Generation Resources in the Annual Energy Outlook 2025	U.S. Energy Information Administration, *Levelized Costs of New Generation Resources in the Annual Energy Outlook in 2025* (Apr. 2025)	https://www.eia.gov/outlooks/aeo/electricity_generation/pdf/AEO2025_LCOE_report.pdf
51-5	Generating Resource Reference Plants: Natural Gas	Northwest Power and Conservation Council, *Generating Resource Reference Plants, Natural Gas*	https://www.nwcouncil.org/2021powerplan_natural-gas_generating-resource-reference-plants/
51-6	Recent Changes to US Coal Plant Operations and Current Compensation Practices	National Association of Regulatory Utility Commissioners, *Recent Changes to U.S. Coal Plant Operations and Current Compensation Practices* (Jan. 2020)	https://pubs.naruc.org/pub/7B762FE1-A71B-E947-04FB-D2154DE77D45
51-7	2024 State of Reliability	North American Electric Reliability Corporation, 2024 State of Reliability (Jun. 2024)	https://www.nerc.com/globalassets/programs/rapa/pa/nerc_sor_2024_technical_assessment.pdf

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52	Middleton Declaration	Declaration of Thomas Middleton in Support of Request for Rehearing by State of Washington	
52-1	Model Toxics Control Act	Washington Dep't of Ecology, Model Toxics Control Act	https://ecology.wa.gov/spills-cleanup/contamination-cleanup/rules-directing-our-cleanup-work/model-toxics-control-act (Last visited January 5, 2026)
52-2	TransAlta Agreed Order	Washington Dep't of Ecology, Agreed Order No. DE 24235 with TransAlta Centralia Generation LLC for TransAlta Centralia (Dec. 29, 2025)	
52-3	Quick Facts Centralia WA	U.S. Census Bureau, Quick Facts Centralia (last visited Jan. 8, 2026)	https://www.census.gov/quickfacts/fact/table/centraliacitywashington/RTN131222
52-4	Data USA	Data USA, Centralia WA, Metropolitan Statistical Area (last visited Jan. 8, 2026)	https://datausa.io/profile/geo/centralia-wa-31000US16500

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52-5	Emissions of Hazardous Air Pollutants	Environmental Health & Engineering, Inc. *Emissions of Hazardous Air Pollutants from Coal-Fired Power Plants* (Mar. 7, 2011)	
53	Rybarik Declaration	Declaration of Brian Rybarik in Support of Request for Rehearing by State of Washington	
54	FEMA Declaration of Emergency	U.S. Dep't of Homeland Security, FEMA, *Emergency Declaration*, FEMA-3629-EM (Dec. 9, 2025)	
55	Best Practices Resource Planning	Synapse Energy Economics, Lawrence Berkeley Nat'l Laboratory, *Best Practices in Integrated Resource Planning* (Nov. 2024, Revised Dec. 2024)	https://www.synapse-energy.com/sites/default/files/IRP_Best_Practices_2024_Synapse_LBNL_24-061_1.pdf https://perma.cc/D68F-WHWQ

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56	Trump Signs Executive Orders	New York Times, *Trump Signs Orders Aimed at Reviving a Struggling Coal Industry* (April 8, 2025)	
57	Declared National Energencies	Brennan Center for Justice, Declared National Emergencies under the National Emergencies Act	https://www.brennancenter.org/our-work/research-reports/declared-national-emergencies-under-national-emergencies-act
58	Campbell Order No. 202-25-7	Dep't of Energy Order No. 202-25-7 (Aug 20, 2025)	
59	Eddystone Order No. 202-25-8	Dep't of Energy Order No. 202-25-8 (Aug. 27, 2025)	
60	Trump Order Keep Michigan Power Plant Open	Tom Perkins, *Trump Order to Keep Michigan Power Plan Open Costs Taxpayers $113m* (Nov. 28, 2025)	https://www.theguardian.com/us-news/2025/nov/28/trump-michigan-power-plant
61	Short-Term Energy Outlook Browser	U.S. Energy Information Administration, Short-Term Energy Outlook Data Brower (Dec. 9, 2025)	https://www.eia.gov/outlooks/steo/data/browser

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62	U.S. Frackers and Saudi Officials Tell Trump They Won't Drill More	Wall Street Journal, *U.S. Frackers and Saudi Officials Tell Trump They Won't Drill More* (Feb. 3, 2025)	https://www.wsj.com/business/energy-oil/trump-oil-drilling-saudi-arabia-71c095ff?reflink=desktopwebshare_permalink
63	Eddystone Order No. 202-25-10	Dep't of Energy Order No. 202-25-10 (Nov. 25, 2025)	
64	Winter Outlook 2025-2026	US Dep't Commerce, Nat'l Oceanic and Atmospheric Admin., Nat'l Weather Service, *Winter Outlook 2025-2026*, at 4 (Last visited Jan. 6, 2025)	https://www.weather.gov/media/abr/sitreport/2025-2026WinterOutlook.pdf
65	TransAlta Signs Agreement	*TransAlta Signs Long-Term Agreement for 700 MW at Centralia Facility Enabling Coal to Natural Gas Conversion*, TransAlta (Dec. 31, 2025, 9:39 AM)	https://transalta.com/newsroom/transalta-signs-long-term-agreement-for-700-mw-at-centralia-facility-enabling-coal-to-natural-gas-conversion/.

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66	TransAlta Conversion	Jacob Moore, @chronline.com, *Announcement comes as company must take its coal-fired burner offline; 700 jobs expected at peak of construction, 40 to be employed permanently* (Dec. 10, 2025)	https://www.chronline.com/stories/transalta-centralia-to-transition-from-coal-to-natural-gas,392533
67	Best Practices Resource Planning (PDF Exhibit Parts 1-7)	Synapse Energy Economics, Lawrence Berkeley Nat'l Laboratory, *Best Practices in Integrated Resource Planning* (Nov. 2024)	https://www.energy.gov/sites/default/files/2024-12/best_practices_irp_nov_2024_final_optimized.pdf
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69	Interior Approves Mining Plan	U.S. Dep't of the Interior, *Interior Approves Mining Plan to Unlock 14.5 Million Tons of Coal at Antelope Mine* (Wyoming) (Aug. 2025)	https://www.doi.gov/pressreleases/interior-approves-mining-plan-unlock-145-million-tons-coal-antelope-mine

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71	White House Offers Concierge Service	Jake Spring, *White House offers 'concierge' service to fossil fuel firms, official says* (Updated Oct. 7, 2025)	https://www.washingtonpost.com/climate-environment/2025/10/07/white-house-fossil-fuel-concierge/
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73	Trump Wants Mining	Hannah Northey, EENews, *Trump wants mining. Federal mine safety workers are on the chopping block* (Sep. 5, 2025)	. https://www.eenews.net/articles/trump-wants-mining-federal-mine-safety-workers-are-on-the-chopping-block/

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75	Notice to Stakeholders	U.S. Dep't of Labor, Mine Safety and Health Admin., *Notice to Stakeholders*	https://www.msha.gov/notice-stakeholders
76	Columbia River Basin Dams	U.S. Army Corps of Engineers, NW Division Website, *Columbia River Dams* accessed Dec. 30, 2025)	https://www.nwd.usace.army.mil/crwm/cr-dams/
77	Hydropower Impact – Bonneville Power Admin.	Bonneville Power Administration, *Hydropower Impact; All About Federal Hydropower, the Largest Source of Clean Power in the U.S.* (Last accessed Dec. 30, 2025)	https://www.bpa.gov/energy-and-services/power/provider-of-choice/resources
78	Hydropower Flows Here – Bonneville Power Admin.	Bonneville Power Administration, *Hydropower Flows Here* (Last accessed Dec. 30, 2025)	https://www.bpa.gov/learn-and-participate/community-education/hydropower-flows-here

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80	Pacific Moisture Drenches the U.S. Northwest	NASA Earth Science, *Pacific Moisture Drenches the U.S. Northwest* (Dec. 12, 2025)	https://science.nasa.gov/earth/earth-observatory/pacific-moisture-drenches-the-u-s-northwest/
81	President Approves Washington Emergency Declaration	U.S. Dep't of Homeland Security, FEMA, *President Donald J. Trump Approves Emergency Declaration for State of Washington* (Dec. 12, 2025)	https://www.fema.gov/press-release/20251212/president-donald-j-trump-approves-emergency-declaration-state-washington
82	Federal Teams Support State-Led Response to Washington Storms	U.S. Dep't of Homeland Security, FEMA, *Federal Teams Support State-Led Response to Historic Washington Severe Storms and Flooding* (Dec. 23, 2025)	https://www.fema.gov/blog/federal-teams-support-state-led-response-historic-washington-severe-storms-and-flooding

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83	Stopping Radical Environ-mentalism to Generate Power	Presidential Actions, Presidential Memoranda, *Stopping Radical Environmentalism to Generate Power for the Columbia River Basin*, (Jun. 12, 2025)	https://www.whitehouse.gov/presidential-actions/2025/06/stopping-radical-environmentalism-to-generate-power-for-the-columbia-river-basin/ (last accessed January 5, 2026)
84	Electricity Data Browser	U.S. Energy Info. Admin., *Electricity Data Browser*, EIA (last visited Nov. 4, 2025)	https://www.eia.gov/electricity/data/browser/#/topic/7
85	Consumer Prices Up 2.9% August 2024 to August 2025	U.S. Bureau of Labor Statistics, *Consumer prices up 2.9 percent from August 2024 to August 2025*, TED: The Economics Daily (Sept. 17, 2024)	https://www.bls.gov/opub/ted/2025/consumer-prices-up-2-9-percent-from-august-2024-to-auCogust-2025.htm
86	Report: Lack of Affordable Housing Options	Wash. State Dept. of Commerce, *Report: Lack of affordable housing options reaches critical levels in communities throughout Washington state* (May 13, 2024)	https://www.commerce.wa.gov/report-lack-of-affordable-housing-options-reaches-critical-levels-in-communities-throughout-washington-state/
87	Trends in Financial Hardship	United for Alice, *The State of Alice in Washington*, United Way of Northern New Jersey	https://www.unitedforalice.org/trends-in-hardship/Washington

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88	Emission Performance Standard SB 1368	California Energy Commission, Emission Performance Standards – SB 1368	https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/emission-performance-standard-sb-1368
89	Coal and the Environment	U.S. Energy Information Administration, *Coal explained: Coal and the environment* (Last updated: Apr. 17, 2024)	https://www.eia.gov/energyexplained/coal/coal-and-the-environment.php
90	What They are Saying: President Trump Stops Radical Environ-mentalism	The White House Newsletter, *What They Are Saying: President Trump Stops Radical Environmentalism to Generate Power for the Columbia River Basin* (Jun. 13, 2025)	https://www.whitehouse.gov/articles/2025/06/what-they-are-saying-president-trump-stops-radical-environmentalism-to-generate-power-for-the-columbia-river-basin/

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91	Special Environmental Analysis of Balancing Authority of Northern California	U.S. Dep't of Energy, *Special Environmental Analysis of Balancing Authority of Northern California (BANC) Operations during 202(c) Emergency Order Operations between September 4, 2022, and September 8, 2022* (Apr. 19, 2024)	https://www.energy.gov/sites/default/files/2024-08/sea-07-banc-special-environmental-analysis-2024-04-19.pdf
92	SPP Balancing Authority Map	Southwest Power Pool (SPP) Balancing Authority Map	https://www.spp.org/documents/62914/rto%20and%20western%20rc%20footprint%20w%20planned%20expansion.png
93	NCR11393 Compliance Audit	Gridforce Energy Management, LLC, Compliance Audit, NCR11393 (Dec. 20, 2019)	
94	Craig Order No. 202-25-14	U.S. Dep't of Energy, Order No. 202-25-14 (Dec. 30, 2025)	

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95	Research Power Corp. Order Authorizing Electricity Exports to Canada	U.S. Dep't of Energy, Grid Deployment Office, Research Power Corporation, GDO Docket No. EA-365-C, Order Authorizaing Electricity Exports to Canada	
96	PJM to Ratchet Down Projected AI Power Demand Eastern US	Peter Behr, Energywire, *PJM to ratchet down projected AI power demand for eastern US* (Jan. 6, 2026)	
97	Declaration of Arne Olson	U.S. of America, Before the Dep't of Energy, Re: Transalta Centralia Generation, Declaration of Arne Olson (Jan. 13, 2026)	
97-1	E3 NW RA Data for Washington	E3, Greater Northwest System Metrics 2025-2030	

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98	Final Order Granting Petition	Washington Utilities and Transportation Commission, Re: Puget Sound Energy, Docket UE-121373, Order 03, Final Order Granting Petition, Subject to Conditions (Jan. 9, 2013)	
99	E3 Northwest Resource Adequacy Study Review	Sylvan Energy Analytics, GridLab, *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* (January 2026)	
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100	Order No. 202-26-18	Dep't of Energy, *Order No. 202-26-18* (Mar. 16, 2026)	
101	February Campbell Order	Dep't of Energy, *Order No. 202-26-16* (Feb. 17, 2026)	

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102	Eddystone Order	Dep't of Energy, *Order No. 202-26-17* (Feb. 23, 2026)	
103	Second Lamoreaux Declaration	Second Declaration of Clinton Lamoreaux in Support of Motion to Intervene, Request for Rehearing, and Motion to Stay by State of Washington (Apr. 14, 2026)	
103-1	Air Discharge Permit Application	Tetra Tech, *Air Discharge Permit Application, TransAlta Centralia Generation, LLC* (Jan. 2026)	
103-2	Completeness determination for air discharge permit application	Letter from Southwest Clean Air Agency to TransAlta Centralia Generation *re: Completeness Determination for Air Discharge Permit Application L-760* (Feb. 25, 2026)	
104	Second Moriyasu Declaration	Declaration of Callahan Moriyasu in Support of Second Rehearing Filing (Apr. 13, 2026)	

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105	Lim Declaration	Declaration of Mengchiu Lim in Support of Motion to Intervene, Request for Rehearing and Motion to Stay by State of Washington (Apr. 14, 2026)	
105-1	TransAlta PSD Permit Application	Tetra Tech, *Prevention of Significant Deterioration Permit Application, TransAlta Centralia Generation, LLC, Lewis County, Washington* (Dec. 2025)	
105-2	Ecology Incom-pleteness Letter	Letter from Dep't of Ecology to TransAlta Centralia Generation, LLC– *Incompleteness Letter for the TransAlta Centralia Plant Project* (Jan. 23, 2026)	
105-3	TransAlta Incom-pleteness Letter Response	Letter from TransAlta to Dep't of Ecology re: *Incompleteness Letter Response for the TransAlta Centralia Plant Project* (Mar. 10, 2026)	

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106	NERC LTRA	North American Electric Reliability Corporation, *Long-Term Reliability Assessment* (Jan. 2026)	https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf
107	Kumar Declaration	Declaration of Nikhil Kumar in Support of Motion to Intervene, Request for Rehearing, and Motion to Stay by State of Washington (Apr. 13, 2026)	
107-1	Sylvan Analytics Review of E3 Report	Sylvan Energy Analytics, *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* (Jan. 2026)	
107-2	Koomey Analytics Data Center Forecasts	Koomey Analytics, *Separating Fact from Fiction in Data Center Electricity Forecasts, A Guide for Regulators* (Mar. 2026)	

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107-3	Brattle Report	Levitt, Pfeifenberger, Mohan, Patel (Brattle), *Proposed Options for Bilateral Integration of Generation Portfolios and Load (BIGPAL)* (Sep. 26, 2025)	
107-4	NERC to Dial Down RTO's Risk Level	Cook, RTO Insider, *MISO: NERC to Dial Down RTO's Risk Level; Members Create Large Load Working Group* (Mar. 25, 2026)	
108	GridStrategies Report	GridStrategies, *Review of NERC's 2025 Long-Term Reliability Assessment* (Mar. 5, 2026)	https://gridstrategiesllc.com/wp-content/uploads/FINAL-2025-LTRA-Review.pdf
109	Carvallo Report	Carvallo, Larsen, Sanstad, Goldman, Berkeley National Laboratory, *Load Forecasting in Electric Utility Integrated Resource Planning* (Oct. 2016)	https://eta-publications.lbl.gov/sites/default/files/lbnl-1006395.pdf
110	WA Revenue Report	Washington State Dep't of Revenue, *Data Center Workgroup: Preliminary Report* (Dec. 1, 2025)	https://dor.wa.gov/sites/default/files/2025-12/2025DataCntrWrkgrpPrelimReport.pdf

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111	UTC Notice of Hybrid Technical Conference	Utilities and Transportation Commission, *Notice of Hybrid Technical Conference* (Apr. 7, 2026)	https://www.utc.wa.gov/casedocket/2026/260162/docsets
112	NERC Statement on LTRA	North American Electric Reliability Corp., *Statement on NERC's 2024 Long-Term Reliability Assessment* (Jun. 25, 2025)	https://www.nerc.com/newsroom/statement-on-nercs-2024-long-term-reliability-assessment
113	NERC Comments on Large Load	Before the Federal Energy Regulatory Commission, Docket No. RM26-4-000, *Comments of the North American Electric Reliability Corporation in Response to Notice Inviting Comments* (Nov. 21, 2025)	https://www.nerc.com/globalassets/who-we-are/legal--regulatory/filings--orders/nerc-filings-to-ferc/2025/large_load_anopr_comments_final_digicert.pdf
114-1	Nat'l Wildlife Fed'n v. NMFS Injunction	U.S. Dist. Court, Dist. of Oregon, Case No. 3:01-cv-640-SI, *Amended Preliminary Injunction Order* (Mar. 2, 2026)	

No.	Exhibit Name	Document Name	URL
114-2	Nat'l Wildlife Fed'n v. NMFS Order	U.S. Dist. Court, Dist. of Oregon, Case No. 3:01-cv-640-SI, *Amended Order Granting Preliminary Injunction* (Mar. 2, 2026)	
115	Dibble Decl.	U.S. Dist. Court, Dist. of Oregon, Case No. 3:01-cv-640-SI, *Declaration of Rachel Dibble in Support of Federal Defendants' Opposition to Plaintiffs' Motions for a Preliminary Injunction* (Dec. 12, 2025)	
116	Stevenson Decl.	U.S. Dist. Court, Dist. of Oregon, Case No. 3:01-cv-640-SI, *Declaration of Audrey Stevenson in Support of Federal Defendants' Opposition to Plaintiffs' Motions for a Preliminary Injunction* (Dec. 11, 2025)	

No.	Exhibit Name	Document Name	URL
117	Hirsch Decl.	U.S. Dist. Court, Dist. of Oregon, Case No. 3:01-cv-640-SI, *Declaration of Nancy Hirsh in Support of Plaintiffs' Reply in Support of Motion for Preliminary Injunction* (Jan. 22, 2026)	
118	BPA FOIA Response	Dep't of Energy, Bonneville Power Administration Letter to Megan Sallomi, Wash. Attorney General's Office, EPA Division, *Response to Request for Agency Records via FOIA* (Feb. 19, 2026)	
119	US EIA Outlook	Short-Term Energy Outlook, April 7, 2026	https://www.eia.gov/outlooks/steo/report/elec_coal_renew.php
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120	Order No. 202-26-28	Dep't of Energy, *Order No. 202-26-28* (Jun. 12, 2026)	
121	May Campbell Order	Dep't of Energy, *Order* No. 202-26-22 (May 19, 2026)	

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122	May Eddystone Order	Dep't of Energy, *Order* No. 202-26-24 (May 21, 2026)	
123	December Craig Order	Dep't of Energy, *Order* No. 202-25-14 (Dec. 30, 2025)	
124	March Craig Order	Dep't of Energy, *Order* No. 202-26-21 (Mar. 30, 2026)	
125	June Craig Order	Dep't of Energy, *Order* No. 202-26-31 (Jun. 26, 2026)	
126	March Culley Order	Dep't of Energy, *Order* No. 202-26-20 (Mar. 23, 2026)	
127	June Culley Order	Dep't of Energy, *Order* No. 202-26-30 (Jun. 18, 2026)	
128	December Schahfer Order	Dep't of Energy, *Order* No. 202-25-12 (Dec. 23, 2025)	
129	March Schahfer Order	Dep't of Energy, *Order* No. 202-26-19 (Mar. 23, 2026)	
130	June Schahfer Order	Dep't of Energy, *Order* No. 202-26-29 (Jun. 18, 2026)	

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131	Third Moriyasu Decl.	Third Declaration of Callahan Moriyasu	
131-1	NERC 2026 SRA	North American Electric Reliability Corporation, 2026 Summer Reliability Assessment (May 2026)	
131-2	Joint IOU Presentation Meeting Slides	WUTC Summer 2026 Resource Adequacy Meeting, Summer 2026 Readiness: A Joint IOU Presentation (Jun. 13, 2026)	
131-3	Resource Adequacy Requirements	The Brattle Group, *Resource Adequacy Requirements: Reliability and Economic Implications* (Sept. 2013)	
131-4	NERC 2025 SRA	North American Electric Reliability Corporation, 2025 Summer Reliability Assessment (May 2025)	
131-5	Grid Strategies Review of LTRA	Review of NERC's 2025 Long-Term Reliability Assessment (Jun. 22, 2026)	

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131-6	Full Report Grid Strategies Review of LTRA	Review of NERC's 2025 Long-Term Reliability Assessment (Mar. 5, 2026)	
131-7	PSE Response to WUTC	PSE Response to WUTC Staff Data Request No. 008 (Apr. 6, 2026)	
131-8	Sylvan June 22, 2026 WA RA Meeting Slides	Sylvan Energy Analytics, GridLab, *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* (Jun. 22, 2026)	
132	December Culley Order	Dep't of Energy, *Order* No. 202-25-13 (Dec. 23, 2025)	
133	DOE Order No. 202-26-44 (Sep. 11, 2026)	DOE Order No. 202-26-44 (Sep. 11, 2026)	
134	Centralia I Request for Rehearing	Motion to Intervene, Request for Rehearing, and Motion to Stay by State of Washington (Jan. 13, 2026)	

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135	Centralia II Request for Rehearing	Motion to Intervene, Request for Rehearing, and Motion to Stay by State of Washington (Apr. 14, 2026)	
136	Centralia III Request for Rehearing	Motion to Intervene, Request for Rehearing, and Motion to Stay by State of Washington (Jul. 10, 2026)	
137	America's Power Letter	America's Power Letter to Chris Wright, Secretary, DOE (Mar. 11, 2025)	
138	The Coal Industry Asked for a Rescue	New York Times, *The Coal Industry Asked for a Rescue. Trump Obliged.* (Sep. 28, 2026)	
139	DOE Order No. 202-26-39 (Aug. 14, 2026)	DOE Order No. 202-26-39 (Aug. 14, 2026)	
140	DOE Order No. 202-26-40 Aug. 21, 2026)	DOE Order No. 202-26-40 (Aug. 21, 2026)	
141	DOE Order No. 202-26-26 (Jun. 4, 2026)	DOE Order No. 202-26-26 (Jun. 4, 2026)	

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142	DOE Order No. 202-26-42 (Sep. 1, 2026)	DOE Order No. 202-26-42 (Sep. 1, 2026)	
143	Fourth Moriyasu Declaration	Fourth Declaration of Callahan Moriyasu in Support of Motion to Intervene, Request for Rehearing, and Motion to Stay by State of Washington	
144	FERC Motion to Intervene and Protest 1	Motion to Intervene and Protest by the State of Washington and the Washington Utilities and Transportation Commission (May 21, 2026)	
145	FERC Motion to Intervene and Protest 2	Motion to Intervene and Protest by the State of Washington and the Washington Utilities and Transportation Commission (Aug. 25, 2026)	
146	FERC Cost Recovery Order 1	Order Rejecting Tariff Revisions (Oct. 1, 2026)	

No.	Exhibit Name	Document Name	URL
147	TransAlta SEPA MDNS	State Environmental Policy Act Mitigated Determination of Nonsignificance (Jul. 31, 2026)	
148	Talebi Declaration	Declaration of Bobbak Talebi in Support of Motion to Intervene, Request for Rehearing, and Motion to Stay by State of Washington	
149	Mich. v. Wright Order	U.S. Court of Appeals, D.C. Cir., Case No. 25-1159, *On Petitions for Review of a Final Order of the Department of Energy* (Sep. 11, 2026)	
150	NERC 2026 State of Reliability Report (June 24, 2026)	NERC 2026 State of Reliability Report (June 24, 2026)	
151	Centralia I Daily Notifications	TransAlta Report Emails to DOE	