



January 31, 2026

VIA EMAIL

The Honorable Chris Wright  
Secretary of Energy  
United States Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-1000  
Attn: *AskCR@hq.doe.gov*

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

Dear Secretary Wright:

Pursuant to Section 202(c) of the Federal Power Act (“FPA”) and the regulations promulgated thereunder by the Department of Energy (“Department” or “DOE”), the Orlando Utilities Commission (OUC) respectfully request that the Secretary of Energy (“Secretary”) find that an emergency exists within OUC’s service area that requires intervention by the Secretary, in the form of a Section 202(c) emergency order, to preserve the reliability of the bulk electric power system. OUC respectfully requests that the Secretary issue an order immediately, effective January 31, 2026, authorizing certain electric generating units supplying power to OUC’s service area to operate up to their maximum generation output levels under the limited circumstances described in this letter, notwithstanding air emissions or other permit limitations. OUC further requests that the order remain effective through 10:00 a.m. Eastern Standard Time (EST) on February 6, 2026. OUC is requesting the Department issue an order for this duration with this limiting condition because OUC anticipates unusually high load forecasts during this time due to extreme cold weather conditions for all of the State of Florida during this period.

**I. Background**

On Friday, January 23 and continuing into Monday, January 26, 2026, a significant winter weather event known as Winter Storm Fern brought heavy snow, sleet, and freezing rain, as well as dangerously cold temperatures and wind chills to multiple states, ranging from the southern plains to the eastern United States. As the storm drifted across the East Coast, more Arctic air moved in behind the storm, prolonging the bitter cold, icy conditions for several days. To date, Winter Storm Fern has caused or threatens to cause severe and widespread impacts across multiple regions of the United States, including extreme cold temperatures, freezing precipitation, high winds,

**ORLANDO UTILITIES COMMISSION**

disruptions to electric generation and transmission systems, natural gas supply constraints, and increased demand for electric and water services. On January 31, and February 1, 2026, and the following week, another round of extreme cold is forecasted to impact the southeast, including Peninsular Florida and South Florida and the entirety of OUC's service territory. As such, customer demand is projected to exceed record-breaking thresholds for OUC on Sunday, February 1, 2026, and again on Monday, February 2, 2026, and which may continue throughout the following week.

While the vast majority of generating units available to cover the load in OUC's service territory continue to function adequately under these stressed conditions, some units will be limited in providing the generation needed by the system conditions and limitations in their environmental permits. As a result, OUC is concerned that under these conditions the system may not have sufficient generation available to meet this unusually high demand and may be forced to curtail load in order to maintain security and reliability of the grid.

## **II. Relief Requested**

Because the output from all of the generation units available to OUC would help to reduce the need for any firm load shedding that may be required during this extreme cold weather event, OUC seeks an immediate order from the Department authorizing the provision of additional energy from the generation units as described in Exhibit A ("Specified Resources"), regardless of emissions or other permit limitations.

To minimize adverse environmental impacts as set forth herein, this order would limit operation of dispatched units to the times and within the parameters determined by OUC as necessary for grid reliability to avoid adverse health and safety impacts to customers from shedding firm customer load. Consistent with good utility practices, OUC 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.

OUC requests this order because it is committed to public health and safety, takes its compliance obligations seriously, and understands the importance of the environmental permit requirements that are at issue. In this case, the risk of power outages in extremely cold temperatures is a more imminent and prominent threat to the communities in OUC's service area than the temporary exceedances of those permit limits that would be allowed under the order. Authorizing the generation resources to operate notwithstanding permit and other limitations may reduce the likelihood that OUC will need to curtail load. This request is narrowly tailored to allow only the exceedances that are necessary to ensure reliability during the limited timeframe of this request. Limiting the requested allowance to situations described above will ensure that the operation of

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the Specified Resources in excess of environmental permit limits will be a last resort to maintain grid stability, thus minimizing any environmental impact to the greatest degree possible.

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

Respectfully Submitted,



Clint Bullock

General Manager and CEO

cc: rebecca.michael@hq.doe.gov  
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angelo.mastrogiacomo@hq.doe.gov

EXHIBIT A  
 (List of Specified Resources)

<b>Unit Location</b>	<b>Nominal rating MW's</b>	<b>Primary Fuel</b>	<b>Backup Fuel</b>
IND RVR CT A	36	Natural Gas	Diesel
IND RVR CT B	36	Natural Gas	Diesel
IND RVR CT C	110	Natural Gas	Diesel
IND RVR CT D	110	Natural Gas	Diesel
OSCEOLA-CT1	157	Natural Gas	Diesel
OSCEOLA-CT2	157	Natural Gas	Diesel
OSCEOLA-CT3	157	Natural Gas	Diesel
STANTON #1	470	Coal	NA
STANTON #2	490	Coal	NA
STANTON A-CC	665	Natural Gas	Diesel
STANTON B-CC	310	Natural Gas	Diesel