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Via email (AskCR@hq.doe.gov)

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 Federal Power Act, Section 202(c)

Dear Secretary Wright:

In anticipation of Winter Storm Fern's impacts, PJM Interconnection, L.L.C. ("PJM") has been working with affected utilities and generators to secure adequate supply to meet expected energy and reserve requirements, and otherwise coordinating with its states and members. PJM has issued an RTO-wide Cold Weather Alert effective 00:01 on January 24, 2026, through 23:59 on January 27, 2026, along with a Maintenance Outage Recall. PJM has also issued a Cold Weather Advisory effective 00:01 on January 24, 2026, through 23:59 on January 30, 2026. Additional Cold Weather Alerts are expected to be issued as we proceed through the storm and re-evaluate updated temperature forecasts through the end of the month. PJM has also declared Conservative Operations effective 00:00 on January 24, 2026, through 23:59 on January 27, 2026.

Winter Storm Fern is forecasted to bring an extended period of frigid weather across the entire PJM Region, with temperatures reaching the single digits throughout the entire RTO and potentially below zero in PJM's Western Region. During the storm, PJM is projecting an all-time winter peak load of approximately 147,000 MW on the morning of Tuesday, January 27 and a peak load of 145,000 MW on the morning of January 31, 2026 – both projections would surpass last year's all-time high winter peak load of 143,700 MW set on January 22, 2025. Some Transmission Owner Zones within the PJM Region are projecting all-time peaks (winter or summer) in their zones. Daily peak demand may exceed 132,000 MW for seven consecutive

days and exceed 142,000 MW at the end of the week from Tuesday through Friday, which is an unprecedented winter streak in PJM. These are extraordinary system conditions.¹

Further, today PJM has been asked to provide emergency energy (in some cases up to 3,000 MW) to neighbors who have already been in an Energy Emergency Alert (EEA) Level 2 during the onset of the storm. While PJM is optimistic about the performance of its generation fleet, PJM has nevertheless observed outages trending up to 20,000 MW. As Winter Storm Fern continues to develop and cross the PJM Region, there are many other unknowns that could exacerbate already tightening system conditions.

Relief Requested

Because of these anticipated system conditions, pursuant to Federal Power Act (“FPA”), Section 202(c)² and part 205, subpart W, of the regulations of the Department of Energy (“DOE” or “Department”),³ PJM respectfully requests that the Secretary of Energy (“Secretary”) find that an imminent electric reliability emergency will exist that will threaten transmission reliability and the ability to serve load in the PJM Region due to a shortage of electric energy, a shortage of facilities for the generation of electric energy, a shortage of fuel or water for generating facilities, and other causes as set forth herein.

PJM respectfully requests that the Secretary issue an order as soon as possible, and preferably sufficiently in advance of 10:00 a.m. on January 25, 2026, and no later than sufficiently before 10:00 a.m. on January 26, 2026, that broadly authorizes all electric generating units located within the PJM Region to operate up to their maximum generation output levels, notwithstanding air quality or other permit limitations or fuel shortages during the pendency of this emergency. Granting the relief on this timeline will help PJM bring this generation online sufficiently before the Monday, January 26 evening peak and the onset of extreme cold weather forecasted to result in an all-time winter peak.

All units appearing on Exhibit A to this application do not oppose the relief PJM is requesting herein.

PJM further requests that the order remain effective through the anticipated duration of the emergency, which is presently anticipated to end at or around 23:59 on January 31, 2026.

PJM has been notified by multiple generation owners that some of their generating units are currently limited in their power output due to emissions, effluent, fuel shortages, and other limits established by environmental permits and state requirements, or that, due to continuing

¹ <https://www.pjm.com/markets-and-operations>

² 16 U.S.C. § 824a(c).

³ 42 U.S.C. § § 7101 and 7151(b).

cold weather conditions, may become subject to such operational limitations. These units are described in **Exhibit A** to this letter. In the event that PJM identifies additional generation units that it deems necessary to operate in excess of these operating limits in order to maintain the reliability of the power grid in the PJM Region, PJM shall provide prompt written notice to the Department of Energy at AskCR@hq.doe.gov with the name and location of those units that PJM has identified, as well as notice by the same means as an updated Exhibit A to its Application such additional generation units, the fuel type of such unit, and the anticipated category of environmental impact, at 11:00 Eastern Standard Time or 21:00 Eastern Standard Time, whichever follows closest in time to the unit identification by PJM to the greatest extent feasible. PJM requests that any such additional units identified in this manner would be covered without the need for a separate order.

Specifically, PJM has been informed that the operation of these generators may be impacted by permit restrictions on sulfur dioxide, nitrogen oxides, carbon monoxide, wastewater release, and other air pollutants (including ammonia) or other limitations, such as fuel throughput. In addition, PJM has been notified that generation owners are also experiencing a shortage of fuel, among other things. The operational limits, permit restrictions, and fuel shortages, and other causes will collectively be called “Operating Limits.”

While multiple entities have confirmed Operating Limits, PJM is also aware that many other generators not included on the list in Exhibit A are subject to similar Operating Limits, and it is possible that some of these units could encounter an operational limitation due to a restriction under an environmental permit or state requirement or otherwise at some point before 23:59 on January 31, 2026. Because the output from all of the generators subject to these restrictions would help to reduce the need for any firm load shedding that may be required during this extreme cold weather event, PJM seeks an immediate order from the Department authorizing the provision of additional energy from the units identified in Exhibit A, as well as any other generating units that PJM may deem necessary to operate in excess of Operating Limits in order to maintain the reliability of the power grid in the PJM Region (the “Covered Units”).

This relief requested would allow PJM to operate the Covered Units consistent with PJM’s Governing Agreements and Good Utility Practice and beyond their Operating Limits in order to maintain the reliability of the power grid in the PJM Region to meet the emergency and serve the public interest.

It is reasonable to expect that any of the Covered Units could exceed their Operating Limits during periods when PJM would need to dispatch the units during the emergency. Absent such an order, there is a risk that residences, hospitals, military facilities, water treatment plants, and other critical facilities may lose electric service to all or parts of their facilities due to the lack of adequate generation or transmission emergencies or the lack of fuel.

This request is tailored to allow only the Covered Units to exceed their Operating Limits as necessary, to ensure reliability during the limited timeframe and because of the extraordinary anticipated system conditions described in this application.

PJM does not lightly request this authorization. It understands the importance of the Operating Limits that are at issue. However, authorizing the Covered Units to operate, notwithstanding their Operating Limits, under these reliability-based conditions will address what otherwise would be emergency conditions that threaten the provision of reliable electric service to the residents and businesses in the greater PJM Region.

Additional Commitments

In support of this application, PJM makes the following additional commitments:

Public Notifications

PJM will take reasonable measures to notify the following that the Department has issued to PJM an emergency order: (1) relevant state officials in PJM's region, and (2) PJM's Members. At a minimum, PJM will post and share a description of the order on its website (with a link to the order) and identify the name, municipality or other political subdivision where generating units dispatched under the requested order are located.

Reporting Notifications

PJM will provide a specific notification to the Department by email to AskCR@hq.doe.gov reporting if generating units have been dispatched and operated in reliance on the emergency order.

PJM is also prepared to provide any additional information Department may request through necessary collaboration with generation resource owners. PJM will promptly respond to any requests from the Department for additional information.

Coordination with Generation Owners

PJM has communicated its intention to seek this emergency authorization to the covered generation owners, and is authorized to state that the generation owners do not oppose this request. At PJM's direction, the generation owners will operate these units to the maximum extent practicable in accordance with an emergency order issued by the Secretary, any federal, state, or local environmental law or regulation, such action or omission shall not be considered

a violation of such environmental law or regulation in accordance with and subject to FPA, section 202(c) (2), (3) and (4), and the terms of the Department order requested herein.

Conclusion

PJM appreciates the Department's expedited consideration of this request.

Respectfully Submitted,

/s/ Michael E. Bryson
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The Honorable Chris Wright
January 24, 2026
Page 6

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