

Order No. 202-25-7

Pursuant to the authority vested in the Secretary of Energy by section 202(c) of the Federal Power Act (FPA), 16 U.S.C. § 824a(c), and section 301(b) of the Department of Energy Organization Act, 42 U.S.C. §7151(b), and for the reasons set forth below, I hereby determine that an emergency exists in portions of the Midwest region of the United States due to a shortage of electric energy, a shortage of facilities for the generation of electricity, and other causes. Issuance of this Order will meet the emergency and serve the public interest.

Order No. 202-25-3

J.H. Campbell Generating Plant (Campbell Plant) is a 1,420 MW coal-fired plant primarily owned by Consumers Energy Company (Consumers) and located in West Olive, MI. In 2021, Consumers announced that it planned to implement a “speed closure” of the Campbell Plant fifteen years before the end of its scheduled design life.¹ Instead of retiring the Campbell Plant at the end of its design life, Consumers planned to accelerate the Campbell Plant’s retirement and discontinue its operations on May 31, 2025.

Order No. 202-25-3, issued pursuant to FPA section 202(c), required that the Campbell Plant remain in operation for 90 days, until August 21, 2025. That order was based on my determination that emergency conditions existed in the region served by the Midcontinent Independent System Operator, Inc. (MISO). Specifically, I determined that MISO likely faced tight reserve margins during the summer 2025 period, particularly during periods of high demand or low generation resource output. I determined that the continued operation of the Campbell Plant would provide additional generation capacity during these periods which would help prevent the potential loss of power to homes and local businesses in the areas that might have been affected by curtailments or outages that would otherwise pose a risk to public health and safety. I determined that the continued operation of the Campbell Plant was necessary to alleviate immediate and anticipated threats to reliability. My determination was based on a number of facts.

First, the North American Electric Reliability Corporation (NERC) released its 2025 Summer Reliability Assessment on May 14, 2025. In its assessment, NERC indicated that “[d]emand forecasts and resource data indicate that MISO is at elevated risk of operating reserve shortfalls during periods of high demand or low resource output.”² In particular, NERC explained that the retirement of thermal generation capacity increased the likelihood of electricity supply

¹ See *Consumers Energy Announces Plan to End Coal Use by 2025; Lead Michigan’s Clean Energy Transformation*, Consumers Energy (June 23, 2021), <https://www.consumersenergy.com/news-releases/news-release-details/2021/06/23/consumers-energy-announces-plan-to-end-coal-use-by-2025-lead-michigans-clean-energy-transformation>. As a coal-fired facility, it would be difficult for the Campbell Plant to resume operations once it has been retired. Specifically, any stop and start of operation creates heating and cooling cycles that could cause an immediate failure that could take 30-60 days to repair if a unit comes offline.

² *2025 Summer Reliability Assessment*, North American Electric Reliability Corporation, at 16 (May 2025), https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2025.pdf (NERC 2025 Summer Reliability Assessment).

shortfalls. NERC anticipated that the near-term period of greatest capacity shortfall for MISO would likely occur in August.³

Second, multiple generation facilities in Michigan have retired in recent years. According to the U.S. Energy Information Administration (EIA), “[s]ince 2020, about 2,700 megawatts of coal-fired generating capacity have been retired and no new coal-fired facilities are planned.”⁴ Additionally, EIA stated, “[t]ypically, Michigan’s nuclear power plants have supplied about 30% of in-state electricity, but the amount of electricity generated by nuclear power plants in Michigan has declined as plants have been decommissioned.”⁵ The state’s Big Rock Point nuclear power plant shut down in 1997, and the Palisades nuclear power plant closed in 2022. While the Palisades nuclear power plant may reopen in 2025, it was not projected to be available during the peak demand period this summer.⁶

Third, the Campbell Plant’s retirement would have further decreased available dispatchable generation within MISO’s service territory, adding to the loss of the other 1,575 MW of natural gas and coal-fired generation that has retired since the summer of 2024. Although MISO and Consumers have incorporated the planned retirement of the Campbell Plant into their supply forecasts and Consumers acquired a 1,200 MW natural gas power plant in Covert, MI, the NERC Assessment still anticipates “elevated risk of operating reserve shortfalls.”⁷

Fourth, MISO’s Planning Resource Auction Results for the 2025-2026 Planning Year, released in April 2025, noted that for the northern and central zones, which includes Michigan, “new capacity additions were insufficient to offset the negative impacts of decreased accreditation, suspensions/retirements and external resources.”⁸ While the results “demonstrated sufficient capacity,” the summer months reflected the “highest risk and a tighter supply-demand balance” and these results “reinforce the need to increase capacity.”⁹

Continuing Emergency Conditions

The emergency conditions that led to the issuance of Order No. 202-25-3 continue, both in the near and long term. The summer season has not yet ended, and the production of electricity from the Campbell Plant will continue to be a critical asset to maintain reliability in MISO this summer. That need is evidenced by the fact that the Campbell Plant was called on by MISO to generate large amounts of electricity during the heat wave that hit MISO this past June. According

³ *Id.*

⁴ *Michigan State Profile and Energy Estimates*, U.S. Energy Info. Admin. (Oct. 17, 2024), <https://www.eia.gov/state/print.php?sid=MI>.

⁵ *Id.*

⁶ The start-up of Palisades is scheduled for the fourth quarter of 2025.

⁷ NERC 2025 Summer Reliability Assessment at 16.

⁸ *Planning Resource Auction—Results for Planning Year 2025–2026*, Midcontinent Independent System Operator, Inc., 13 (May 29, 2025), https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf (MISO Planning Resource Auction – Results for Planning Year 2025-26).

⁹ *Id.* at 2,12.

to the U.S. Environmental Protection Agency’s data, over the month of June, the Campbell Plant generated approximately 664,000 MWh, running at 61% capacity.¹⁰ In fact, between June 11 and August 18, MISO issued dozens of alerts to manage grid reliability in its Central Region in response to hot weather, severe weather, high customer load, forced generation outages, and transfer capability limits. MISO issued alerts for the Central Region on at least 40 of the 69 days between June 11 and August 18. In June, MISO issued alerts affecting the Central Region on 18 days, including an Energy Emergency Alert (EEA) level 1 ("Max Gen Step 1b") on June 23 to enable MISO to take emergency action to ensure grid stability, including bringing additional resources online.¹¹ The Central Region had alerts on 21 days in July, including one Max Generation Warning on July 29 and two Max Generation Alerts on July 28 and 29.¹² Two Capacity Advisory Initiate alerts have been issued in August to date.¹³ Moreover, the May 2025 NERC Summer Reliability Assessment referenced a Seasonal Outlook issued by the National Oceanic and Atmospheric Administration (NOAA), which estimates that much of the Midwest has a 33%-40% chance to experience above-normal temperatures this summer.¹⁴ The Seasonal Outlook released by NOAA on July 17, 2025, increased this estimate for much of the region to a 40%-50% chance.¹⁵

MISO’s resource adequacy problems are not limited to the summer. In 2022, MISO requested Federal Energy Regulatory Commission (FERC) approval of its filing to revise its resource adequacy construct (including the Planning Resource Auction or PRA) to establish capacity requirements for each of the four seasons of the year rather than on an annual basis determined by peak summer demand.¹⁶ MISO justified this revision by explaining that “Reliability risks associated with resource adequacy have shifted from ‘Summer only’ to a year-round

¹⁰ See, *Custom Data Download*, EPA CAMPD (Clean Air Markets Program Data), <https://campd.epa.gov/data/custom-data-download> (search criteria to produce these results could include Emissions >> Monthly >> Unit (default) >> Apply >> “2025” and “June.” The data can then be filtered to only include the Campbell Plant.)

¹¹ An Energy Emergency Alert is an alert declared by the Transmission Provider in accordance with the NERC Operating Manual associated with the Transmission Provider’s inability to provide for the Energy and Operating Reserve requirements of the MISO Balancing Authority Area. For more information, see MISO, FERC Electric Tariff, Module A, § 1.E (Definitions) (92.0.0). For more information on Energy Emergency Alert levels, see North American Electric Reliability Corporation. (n.d.). *EOP-011-1 Emergency Operations*. <https://www.nerc.com/pa/stand/reliability%20standards/eop-011-1.pdf>.

¹² A Max Gen Alert occurs when MISO is forecasting a potential capacity shortage. A Max Gen Warning is a warning to prepare for a possible Max Gen Event. See MISO Operating Procedures, <https://efis.psc.mo.gov/Document/Display/9379> (20180920).

¹³ A Capacity Advisory alert is an advisory issued based on the potential for limited operating capacity margins (<5%) in the following 2-3 days. See MISO Operating Procedures, <https://efis.psc.mo.gov/Document/Display/9379> (20180920).

¹⁴ NERC 2025 Summer Assessment at 9.

¹⁵ *Seasonal Outlook*, NOAA Climate Prediction Ctr., (July 17, 2025), https://www.cpc.ncep.noaa.gov/products/predictions/long_range/seasonal.php?lead=1.

¹⁶ *Midcontinent Independent System Operator, Inc.*, FERC Docket No. ER22-495-000 (Nov. 30, 2021). This request was approved by FERC on August 31, 2022. *Midcontinent Independent System Operator, Inc.*, 180 FERC ¶ 61,141 (2022).

concern.”¹⁷ MISO noted that over 60 percent of all “MaxGen” events (events when MISO initiates emergency procedures because of concerns over the adequacy of available generation) occurred outside of the summer season.¹⁸

In December of 2023, MISO released an “Attributes Roadmap,” in which it presented “an in-depth look at the challenges of operating a reliable bulk electric system in a rapidly transforming energy landscape.”¹⁹ Among other things, this report described changes in the time of year during which the risk of the loss of load was greatest. For the 2023/24 Planning Year, the greatest risk of loss of load was in the summer, but it is expected that by the summer of 2027, there will be an equal loss of load risk in both the summer and fall seasons. MISO also projects that the risk of loss of load in the winter and spring seasons, although not as high as in the summer or fall, will nevertheless increase over time.²⁰

More recently, MISO affirmed the resource adequacy problems occurring outside of its summer season in its 2024 report entitled, “*MISO’s Response to the Reliability Imperative*.”²¹ In a section of that report entitled “Risks in Non-Summer Seasons,” MISO again stressed that it has resource reliability concerns outside of the summer season.

Widespread retirements of dispatchable resources, lower reserve margins, more frequent and severe weather events and increased reliance on weather-dependent renewables and emergency-only resources have altered the region’s highest historic risk profile, creating risks in non-summer months that rarely posed challenges in the past.²²

These MISO studies indicate that the emergency conditions caused by the loss of generation capacity in MISO extend past the summer season.

The evidence indicates that there is also a potential longer term resource adequacy emergency in MISO. When MISO reported the results of its PRA for the 2025-26 Planning Year, it noted that “new capacity additions were insufficient to offset the negative impacts of decreased accreditation, suspensions/retirements and external resources” in the northern and central zones, which include Michigan.²³

On June 6, 2025, subsequent to the issuance of Order No. 202-25-3, the Organization of MISO States (OMS) and MISO issued the results of their survey, which has been conducted annually for many years to determine the degree to which expected capacity resources satisfy

¹⁷ MISO Transmittal Letter at 3, FERC Docket No. ER22-495-000 (Nov. 30, 2021).

¹⁸ *Id.* at 3-4.

¹⁹ *Attributes Roadmap*, MISO (Dec. 2023), <https://cdn.misoenergy.org/2023%20Attributes%20Roadmap631174.pdf>.

²⁰ *Id.* at 11.

²¹ *MISO’s Response to the Reliability Imperative*, MISO (Updated Feb. 2024), <https://cdn.misoenergy.org/2024+Reliability+Imperative+report+Feb.+21+Final504018.pdf>.

²² *Id.* at 12.

²³ MISO Planning Resource Auction – Results for Planning Year 2025-26 at 13.

planning reserve margin requirements.²⁴ The 2025 Survey presented projections of resource adequacy for the summer of 2026 and subsequent years. Although the survey projected a potential capacity surplus for the summer of 2026, it also projected that at least 3.1 GW of additional generation capacity beyond currently committed generation capacity must be added to meet the projected planning reserve margin.²⁵ The survey also projected that there would be insufficient capacity to meet the peak demand for electricity in each of the following four summers, increasing from a deficit of 1.4 GW in 2027 to 8.2 GW in 2030.²⁶ Similar results were projected for MISO's winter seasons, with a small surplus of generation capacity in 2026, followed by increasing deficits the following four years.²⁷

The primary reasons for these projected deficits also are shown on the OMS-MISO survey. Large amounts of existing generation capacity are projected to be retired each year while, at the same time, the demand for electricity is projected to increase at an accelerating pace.²⁸ Although the OMS-MISO survey projects generation capacity to continue to increase in the coming years with the addition of new potential generation assets, the increase in capacity is largely offset by the projected retirements, and does not keep up with the growth in demand.²⁹

MISO has been taking steps to address these projected deficits. For example, on June 6, 2025, MISO submitted a proposal to FERC to establish an Expedited Resource Addition Study (ERAS) process to provide a framework for the expedited study of interconnection requests to address urgent resource adequacy and reliability needs in the near term. This proposal was approved by FERC on July 21, 2025.³⁰ The ERAS process should help expedite the construction of needed new capacity. However, resources studied under the ERAS will have commercial operation dates that are at least three years away, and are provided an additional three year grace period to commence commercial operations.³¹ In addition, supply chain constraints impeding the acquisition of critical grid components, including large natural gas turbines and transformers, are likely to further hinder rapid construction and exacerbate reliability concerns.³² Consequently, the new ERAS process is unlikely to result in the addition of any new generation capacity in the next few years.

²⁴ 2025 OMS-MISO Survey Results, OMS and MISO (Updated June 6, 2025)

<https://cdn.misoenergy.org/20250606%20OMS%20MISO%20Survey%20Results%20Workshop%20Presentation702311.pdf>.

²⁵ *Id.* at 2.

²⁶ *Id.* at 7.

²⁷ *Id.* at 9.

²⁸ *Id.* at 7, 9.

²⁹ *Id.*

³⁰ *Midcontinent Independent System Operator, Inc.*, 192 FERC ¶ 61,064 (2025).

³¹ 192 FERC ¶ 61,064 at P 84.

³² See generally, *US Gas-Fired Turbine Wait Times as Much as Seven Years; Costs Up Sharply*, S&P Global (May 2025), [US gas-fired turbine wait times as much as seven years; costs up sharply | S&P Global](#). “With demand for natural gas-fired turbines in the US rapidly accelerating amid power demand growth forecasts driven by AI, manufacturing, and electrification, wait times for turbines are anywhere between one and seven years depending on the model, and costs have increased considerably, experts told Platts.”

Order 202-25-3 was preceded by executive orders on January 20, 2025, and April 8, 2025, in which President Donald J. Trump underscored the dire energy challenges facing the Nation due to growing resource adequacy concerns. Specifically, in Executive Order 14262, “Strengthening the Reliability and Security of the United States Electric Grid,” President Trump emphasized that “the United States is experiencing an unprecedented surge in electricity demand driven by rapid technological advancements, including the expansion of artificial intelligence data centers and increase in domestic manufacturing.”³³ President Trump likewise recognized, in Executive Order 14156, “Declaring a National Energy Emergency,” that the “United States’ insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to our Nation’s economy, national security, and foreign policy.”³⁴ The Executive Order adds: “Hostile state and non-state foreign actors have targeted our domestic energy infrastructure, weaponized our reliance on foreign energy, and abused their ability to cause dramatic swings within international commodity markets.”³⁵

The Department’s July 2025 Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid, issued pursuant to the President’s directive in Executive Order 14262, details the myriad challenges affecting the Nation’s energy outlook. “Absent decisive intervention, the Nation’s power grid will be unable to meet projected demand for manufacturing, re-industrialization, and data centers driving artificial intelligence (AI) innovation.”³⁶ The prolific growth of data centers for the development of AI, as well as their immense energy needs, presents a new and unexpected source of load growth. This growth is illustrated by the fact that there are more than twenty AI companies operating in Michigan alone.³⁷ In addition, as just one example, Consumers has announced an additional 1 GW of new power to a planned hyperscale data center and “continue[s] to see positive momentum with data centers within the 9 GW pipeline”³⁸

Grid operators—including MISO itself—have likewise acknowledged the Nation’s current energy crisis. For instance, during a March 25, 2025, hearing before the House Committee on Energy and Commerce, Jennifer Curran, Senior Vice President, Planning and Operations, MISO, testified that “the MISO region faces resource adequacy and reliability challenges due to the

³³ Executive Order No. 14262, 90 Fed. Reg. 15521 (Apr. 8, 2025) (*Strengthening the Reliability and Security of the United States Electric Grid*), <https://www.whitehouse.gov/presidential-actions/2025/04/strengthening-the-reliability-and-security-of-the-united-states-electric-grid/>.

³⁴ Executive Order No. 14156, 90 Fed. Reg. 8433 (Jan. 20, 2025) (*Declaring a National Energy Emergency*), <https://www.whitehouse.gov/presidential-actions/2025/01/declaring-a-national-energy-emergency/>.

³⁵ *Id.*

³⁶ See also *Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid*, U.S. Department of Energy (July 2025), at 1, <https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%29.pdf>.

³⁷ Ekku Jokinen, *Top 21 Artificial Intelligence Companies in Michigan*, (last accessed Aug. 13, 2025), <https://www.inven.ai/company-lists/top-21-artificial-intelligence-companies-in-michigan>.

³⁸ See *Michigan utility Consumers Energy to provide 1GW of power to new hyperscale data center*, Data Center Dynamics (August 05, 2025), <https://www.datacenterdynamics.com/en/news/michigan-utility-consumers-energy-to-provide-1gw-of-power-to-new-hyperscale-data-center/> (quoting Consumers Energy CEO Garrick Rochow).

changing characteristics of the electric generating fleet, inadequate transmission system infrastructure, growing pressures from extreme weather, and rapid load growth.”³⁹ Ms. Curran also described “much stronger growth [in demand for electricity] from continued electrification efforts, a resurgence in manufacturing, and an unexpected demand for energy-hungry data centers to support artificial intelligence.”⁴⁰ She added, “[a] growing reliability risk is that the rapid retirement of existing coal and gas power plants threatens to outpace the ability of new resources with the necessary operational characteristics to replace them.”⁴¹

ORDER

FPA section 202(c)(1) provides that whenever the Secretary of the Department of Energy determines “that an emergency exists by reason of a sudden increase in the demand for electric energy, or a shortage of electric energy or of facilities for the generation or transmission of electric energy,” then the Secretary has the authority “to require by order . . . such generation, delivery, interchange, or transmission of electric energy as in its judgment will best meet the emergency and serve the public interest.”⁴² This statutory language constitutes a specific grant of authority to the Secretary to require the continued operation of the Campbell Plant when the Secretary has determined that such continued operation will best meet an emergency caused by a sudden increase in the demand for electric energy or a shortage of generation capacity.

Such is the case here. As described above, the emergency conditions resulting from increasing demand and accelerated retirements of generation facilities supporting the issuance of Order No. 202-25-3 will continue in the near term and are also likely to continue in subsequent years. This could lead to the potential loss of power to homes and local businesses in the areas that may be affected by curtailments or outages, presenting a risk to public health and safety. Given the responsibility of MISO to identify and dispatch generation necessary to meet load requirements, I have determined that, under the conditions specified below, continued additional dispatch of the Campbell Plant is necessary to best meet the emergency and serve the public interest under FPA section 202(c).

To ensure the Campbell Plant will be available if needed to address emergency conditions, the Campbell Plant shall remain in operation until November 19, 2025.⁴³

³⁹ Keeping the Lights On: Examining the State of Regional Grid Reliability Before the House Committee on Energy and Commerce, Subcommittee on Energy, 119th Cong. (Mar. 25, 2025) (statement of Ms. Jennifer Curran, Senior Vice President for Planning and Operations, Midcontinent Independent System Operator), at 5, https://democrats-energycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov/files/evo-media-document/witness-testimony_curran_eng_grid-operators_03.25.2025.pdf.

⁴⁰ *Id.* at 6.

⁴¹ *Id.* at 7.

⁴² Although the text of FPA section 202(c) grants this authority to “the Commission,” section 301(b) of the Department of Energy Organization Act transferred this authority to the Secretary of the Department of Energy. *See* 42 U.S.C. § 7151(b) (2018).

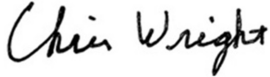
⁴³ 16 U.S.C. § 824a(c)(4).

Based on my determination of an emergency set forth above, I hereby order:

- A. From August 21, 2025, MISO and Consumer Energy shall take all measures necessary to ensure that the Campbell Plant is available to operate. For the duration of this Order, MISO is directed to take every step to employ economic dispatch of the Campbell Plant to minimize cost to ratepayers. Following the conclusion of this Order, sufficient time for orderly ramp down is permitted, consistent with industry practices. Consumers Energy is directed to comply with all orders from MISO related to the availability and dispatch of the Campbell Plant.
- B. To minimize adverse environmental impacts, this Order limits operation of dispatched units to the times and within the parameters as determined by MISO pursuant to paragraph A. MISO shall provide a daily notification to the Department (via AskCR@hq.doe.gov) reporting whether the Campbell Plant has operated in compliance with the allowances contained in this Order.
- C. All operation of the Campbell Plant must comply with applicable environmental requirements, including but not limited to monitoring, reporting, and recordkeeping requirements, to the maximum extent feasible while operating consistent with the emergency conditions. This Order does not provide relief from any obligation to pay fees or purchase offsets or allowances for emissions that occur during the emergency condition or to use other geographic or temporal flexibilities available to generators.
- D. By September 4, 2025, MISO is directed to provide the Department of Energy (via AskCR@hq.doe.gov) with information concerning the measures it has taken and is planning to take to ensure the operational availability of the Campbell Plant consistent with this Order. MISO shall also provide such additional information regarding the environmental impacts of this Order and its compliance with the conditions of this Order, in each case as requested by the Department of Energy from time to time.
- E. Consumers is directed to file with the Federal Energy Regulatory Commission Tariff revisions or waivers to effectuate this Order. Rate recovery is available pursuant to 16 U.S.C. § 824a(c).
- F. This Order shall not preclude the need for the Campbell Plant to comply with applicable state, local, or Federal law or regulations following the expiration of this Order.
- G. Because this Order is predicated on the shortage of facilities for generation of electric energy and other causes, the Campbell Plant shall not be considered a capacity resource.

H. This Order shall be effective from 00:00 Eastern Daylight Time (EDT) on August 21, 2025, and shall expire at 00:00 EDT on November 19, 2025, with the exception of applicable compliance obligations in paragraph D.

I. Issued in Norfolk, Virginia at 8:50pm Eastern Daylight Time on this 20th day of August 2025.



Chris Wright
Secretary of Energy

cc: **FERC Commissioners**
Chairman David Rosner
Commissioner Lindsay S. See
Commissioner Judy W. Chang

Michigan Public Service Commissioners
Chairman Dan Scripps
Commissioner Katherine Peretick
Commissioner Shaquila Myers