December 16, 2025 Electronically Submitted via MiEnviro

Ms. Bonnie Broadwater
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2316

RE: NOTICE OF PLANNED PARTICIPATION
ANNUAL PROGRESS REPORT PURSUANT TO 40 CFR 423.19(g)(3)
CONSUMERS ENERGY COMPANY, JH CAMPBELL COMPLEX NPDES PERMIT NO. MI0001422,
STEAM ELECTRIC EFFLUENT LIMITATION GUIDELINES

Dear Ms. Broadwater,

Consumers Energy Company (Consumers) submitted a Notice of Planned Participation (NOPP) for the JH Campbell (Campbell) Complex, NPDES Permit No. MI0001422 on October 11, 2021, seeking to qualify as an electric generating unit that will achieve permanent cessation of coal combustion by December 31, 2028. According to 40 CFR 423.19 (g)(3) annual progress reports shall be submitted detailing the progress made to achieve the cessation of coal use. Consumers is submitting the following information to support the requirements for Campbell Units 1, 2, & 3 that will achieve permanent cessation of coal combustion by December 31, 2028.

Pursuant to 40 CFR 423.19 (g)(4), an annual progress report shall detail the completion of any interim milestones listed in the NOPP since the previous progress report, provide a narrative discussion of any completed, missed, or delayed milestones, and provide updated milestones. An updated timeline, to reflect the requirements of 40 CFR 423.19(f)(4), is included in Attachment A. A copy of the official retirement filing as required under 40 CFR 423.19(f)(4)(ii), is included in Attachment B.

Since the planned retirement date of May 31, 2025, Consumers received three emergency orders issued by the Department of Energy (DOE) under section 202(c) of the Federal Power Act. These orders require Campbell to take necessary measures to ensure that the Campbell Plant is available to operate and because of these orders Consumers is delayed in the retirement of Units 1, 2, and 3. A copy of each order is included in Attachments C, D, and E. This information is reflected in the timeline in Attachment A.

Consumers Energy
1945 W. Parnall Road
Jackson, MI 49201
www.consumersenergy.com

Environmental Quality & Sustainability

If you have any questions or need additional information, please do not hesitate to contact Rachel Proctor at (517) 788-1429 or by email at Rachel.proctor@cmsenergy.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Nathan J. Hoffman
Consumers Energy
Executive Director of Fossil Generation

Electronically Distributed

CC: Mr. Tarek Buckmaster, EGLE
Ms. Rachel Proctor, Consumers Energy Company
Ms. Kristin Melcher, Consumers Energy Company, Campbell

Attachment A
Permanent Cessation Timeline Update

ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES
NOPP Submittal	10/13/2021	COMPLETE	
Expected Integrated Resource Plan (IRP) Approval by the MPSC	6/27/2022	COMPLETE	12/16/2022: The IRP was approved on June 23, 2022. A copy of the most recent integrated resource plan for which the applicable state agency approved the retirement of the unit subject to the Effluent Limitation Guidelines (ELGs), pursuant to 40 CFR 423.19(f)(2), was included as **Attachment B** in the 2022 Annual Progress Report.
Expected MISO Study Results	3/11/2022	COMPLETE	12/15/2023: MISO approved the suspension of Campbell Units 1, 2, & 3 effective June 1, 2025, on March 11, 2022
Cold & Dark[1] Outage Specifications Finalized	~~4/22/2024~~ 7/18/2024	COMPLETE	12/16/2022: Cold and Dark outage specifications are delayed; however, the delay in these final specifications will not impact Campbell Units 1, 2, and 3 retirement schedule, which are still expected to retire in 2025 consistent with the NOPP. The delay is due to the difference between the initial conceptual schedule and the refined project schedule.

ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES
Cold & Dark Contract Award	~~1/26/2025~~ 12/19/2024	COMPLETE	12/16/2022: Change in date is due to the difference between the initial conceptual schedule and the refined project schedule.
MPSC[2] and MISO[3] approved Unit 1, 2, & 3 Retirement; Cold & Dark Outage Start	~~5/31/2025~~ ~~6/1/2025~~ ~~8/21/2025~~ ~~11/19/2025~~ 2/17/2026	DELAYED	11/18/2025: Received third emergency order (Order No. 202-25-9, see **Attachment E**) issued by the Department of Energy (DOE) under section 202(c) of the Federal Power Act. This order requires Campbell to take necessary measures to ensure that the Campbell Plant was available to operate. Order Expires on 2/17/2026. 8/20/2025: Received second emergency order (Order No. 202-25-7, see **Attachment D**) issued by the Department of Energy (DOE) under section 202(c) of the Federal Power Act. This order required Campbell to take necessary measures to ensure that the Campbell Plant was available to operate. Order Expires on 11/19/2025. 5/23/2025: Received first emergency order (Order No. 202-25-3, see **Attachment C**) issued by the Department of Energy (DOE) under section 202(c) of the Federal Power Act. This order required Campbell to take necessary measures to ensure that the Campbell Plant was available to operate. Order Expired 8/21/2025. 12/10/2024: Suspension of Campbell Units 1,2 & 3, effective June 1, 2025. See **Attachment B.**

ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES
			10/11/2021: 5/31/2025 is the expected date that JH Campbell Units 1, 2, and 3 will no longer generate electricity
Cold & Dark Outage Complete	~~9/6/2025~~ ~~8/31/2025~~ ~~10/31/2025~~ ~~1/20/2026~~ TBD	DELAYED	11/18/2025: Due to the emergency orders (Order No. 202-25-9, 202-25-7, 202-25-3) issued by the Department of Energy (DOE) under section 202(c) of the Federal Power Act the retirement date has been delayed which subsequently delays the plants cold and dark outage timeline. 12/14/2023: The change in date will not impact Campbell Units 1, 2, and 3 retirement schedule. 10/11/2021: JH Campbell Units 1, 2, and 3 will be deenergized and ready for AD&D. The change in date is due to the difference between the initial conceptual schedule and the refined project schedule.

Notes:
(1) "Cold & Dark" refers to a period of time where preparations are put in place for Abatement, Decommissioning & Demolition (AD&D).
(2) MPSC is the Michigan Public Service Commission
(3) MISO is the Midcontinent Independent System Operator

Attachment B
Official Filing Pursuant to §423.19(g)(4)(ii)

Consumers Energy
Count on Us®

A CMS Energy Company

Timothy J. Sparks, P.E.
Vice President Electric Grid Integration

VIA Electronic Mail

December 14,2021

Andrew Witmeier
Director of Resource Utilization
Midcontinent Independent System Operator, Inc.
720 City Center Drive
Carmel, IN 46032

Re: Suspension of Campbell Units 1, 2 & 3

Dear Mr. Witmeier:

Consumers Energy Company ("Company") hereby provides notice to the Midcontinent Independent System Operator, Inc. ("MISO") that it intends to suspend Campbell Units 1, 2 and 3 effective June 1, 2025. Attached is the notice of such intent in accordance with Section 38.2.7 and Attachment Y of MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff ("Tariff").

Campbell Unit 3 is jointly owned by the Company (93.3%), CPNode CONS.CAMPBELL3, Michigan Public Power Agency (4.8%), CPNode CONS.CA3.MPPA, and Wolverine Power Supply Cooperative (1.9%), CPNode CONS.CA3_WPSC. The Company attests that, pursuant to the relevant Operating Agreements, it is authorized to submit this Attachment Y notice on behalf of all Campbell Unit 3 owners.

In the event you have any questions regarding this matter, please contact Kathy Wetzel at (517) 788-2039.

Regards,

Timothy J. Sparks
Vice President Electric Grid Integration
Consumers Energy Company
1945 W. Parnall Rd.
Jackson, MI 49201

Cc: Kathy Wetzel
Thomas Clark

ATTACHMENT Y

Notification of Generation Resource/SCU/Pseudo-tied Out Generator

Change of Status,

Including Notification of Rescission

This is a notification of change of status of a Generation Resource, Synchronous Condenser Unit ("SCU"), or Pseudo-tied out Generator in accordance with Section 38.2.7.a of the Tariff. An electronic copy of the completed form will be accepted by the Transmission Provider, however, a form will not be considered complete until the original form containing an original signature, including all attachments, is received by the Transmission Provider at the following address: MISO, Attention: Director of Transmission Planning; 720 City Center Drive, Carmel, IN 46032.

The Transmission Provider may request additional information as reasonably necessary to support operations under the Tariff.

Owner of the Generation Resource, SCU or Pseudo-tied out Generator:
Consumers Energy Company (see attached letter re: Campbell Unit 3)

Name of Market Participant: Consumers Energy Company - NERC ID: CETR

Owner's state of organization or incorporation Michigan

Generation Resource/SCU/Pseudo-tied Out Generator [plant and unit number(s)] Campbell Units 1, 2 & 3

Source/Identification of Generation Interconnection Service [name of agreement, parties, date, date filed and docket number, and any other information to identify an agreement] CAMPBELL UNITS 1+2: UMBRELLA GIA BETWEEN CONSUMERS, METC + MISO FERC DOCKET ER21-999. CAMPBELL UNIT 3: FERC DOCKET ER06-1441 FOR MISO SERVICE AGREEMENT NO. 1755

Pursuant to the terms of the MISO Tariff, Owner hereby certifies that it will

[X] Suspend for economic reasons operation of all or a portion of the Generation Resource/SCU/Pseudo-tied out Generator commencing on 1st [day] of June [month] of 2025 [year]

[ ] Rescind the current notice to SuspendThe facility is further described as follows:

Location: West Olive, Michigan

Unit Name	CPNode (if applicable)	Nameplate Capacity(MW)	Change in Capacity(MW)
Campbell Unit 1	CONS.CAMPBELL1	260	260
Campbell Unit 2	CONS.CAMPBELL2	360	360
Campbell Unit 3	CONS.CAMPBELL3	844	844

Owner understands and agrees that this notification is provided in accordance with Section 38.2.7 of the Transmission Provider's Tariff and will not be made public by the Transmission Provider except as provided for under Section 38.2.7 of the Tariff.

The undersigned certifies that he or she is an officer of the owner of the Generation Resource/SCU/Pseudo-tied out Generator, that he or she is authorized to execute and submit this notification, and that the statements contained herein are true and correct.

Signature

Name: TIMOTHY J SPARKS

Title: VP ELECTRIC GRID INTEGRATION

Date:

Contact Information

Email: TIMOTHY.SPARKS@CMSENERGY.COM

Phone: 517 788 1053

Andrew Witmeier
Director, Resource Utilization
317-249-5585
awitmeier@misoenergy.org

VIA OVERNIGHT DELIVERY

March 11, 2022

Timothy J. Sparks
Vice President, Electric Grid Integration
Consumers Energy Company
1945 W. Parnall Rd.
Jackson, MI 49201

Subject: **Approval of Campbell Units 1,2 &3 Attachment Y Suspension Notice**

Dear Mr. Sparks,

On December 14, 2021, Consumers Energy Company submitted an Attachment Y Notice to MISO for the suspension of Campbell Units 1,2 & 3, effective June 1, 2025. After being reviewed for power system reliability impacts as provided for under Section 38.2.7 of MISO's Open Access Transmission, Energy, and Operating Reserve Markets Tariff ("Tariff"), the suspension of Campbell Units 1,2 & 3 would not result in violations of applicable reliability criteria. Therefore, Campbell Units 1,2 & 3 may suspend without the need for the generators to be designated as a System Support Resource ("SSR") units as defined in the Tariff.

As there were no reliability criteria violations, MISO will continue to preserve the confidentiality of the Attachment Y Notice.

Please do not hesitate to contact me if you have any questions regarding this matter.

Respectfully,

Andrew Witmeier
Director, Resource Utilization

Attachment C
Order No. 202-25-3

Order No. 202-25-3

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 electric energy, and other causes, and that issuance of this Order will meet the emergency and serve the public interest.

Emergency Situation

The Midcontinent Independent System Operator (MISO) faces potential tight reserve margins during the summer 2025 period, particularly during periods of high demand or low generation resource output. 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."[1] In particular, the retirement of thermal generation capacity creates the potential for electricity supply shortfalls. NERC anticipates that the near-term period of highest capacity shortfall for MISO will occur in August.[2]

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."[3] 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."[4] 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 will not be available during the peak demand period this summer.

The 1,560 MW J.H. Campbell coal-fired power plant in West Olive, MI, is scheduled to cease operations on May 31, 2025. Its retirement would further decrease available dispatchable generation within MISO's service territory, removing additional such generation along with the other 1,575 MW of natural gas and coal-fired generation that has retired since the summer of 2024. In 2021, Consumers announced that it planned to "speed closure" of Campbell in 2025, several years before the end of its scheduled design life.[5] Although MISO and Consumers have

[1] 2025 summer reliability assessment. (May 14, 2025). https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SRA_2025.pdf
[2] *Id*.
[3] U.S. Energy Information Administration, Michigan State Energy Profile, Oct. 17, 2024, *available at*: https://www.eia.gov/state/print.php?sid=mi.
[4] *Id.*
[5] 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

incorporated the planned retirement into their supply forecasts and acquired a 1,200 MW natural gas power plant in Covert, MI, the NERC Assessment still anticipates "elevated risk of operating reserve shortfalls."

MISO's Planning Resource Auction Results for Planning Year 2025-26, released in April 2025, note 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." While the results "demonstrated sufficient capacity," the summer months reflected the "highest risk and a tighter supply-demand balance" and the results "reinforce the need to increase capacity."[6]

ORDER

Given the determination that an emergency exists as discussed above, the responsibility of MISO to ensure reliability of its system, and the ability of MISO to identify and dispatch generation necessary to meet load requirements, I have determined that, under the conditions specified below, additional dispatch of the Campbell Plant is necessary to best meet the emergency and serve the public interest for purposes of FPA section 202(c). This determination is based on the insufficiency of dispatchable capacity and anticipated demand during the summer months, and 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.

This Order is limited in duration to align with the emergency circumstances. Because the additional generation may result in a conflict with environmental standards and requirements, I am authorizing only the necessary additional generation on the conditions contained in this Order, with reporting requirements as described below.

FPA section 202(c) requires the Secretary of Energy to ensure that any 202(c) order that may result in a conflict with a requirement of any environmental law be limited to the "hours necessary to meet the emergency and serve the public interest, and, to the maximum extent practicable," be consistent with any applicable environmental law and minimize any adverse environmental impacts.

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

A. From the time this Order is issued on May 23, 2025, MISO and Consumers 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 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.

[6] https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250428694160.pdf

B. To minimize adverse environmental impacts, this Order limits operation of dispatched units through the expiration of the Order. 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 June 15, 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 and economic dispatch of the Campbell Plant consistent with the public interest. 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. The extent to which MISO's current Tariff provisions are inapposite to effectuate the dispatch and operation of the units for the reasons specified herein, the relevant governmental authorities are directed to take such action and make accommodations as may be necessary to do so.

F. Consumers is directed to file with the Federal Energy Regulatory Commission Tariff revisions or waivers necessary to effectuate this order. Rate recovery is available pursuant to 16 U.S.C. § 824a(c).

G. 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.

H. This Order shall be effective upon its issuance, and shall expire at 00:00 EDT on August 21, 2025, with the exception of the reporting requirements in paragraph D and applicable compliance obligations in paragraph E.

I. Issued in Washington, D.C. at 3:15:pm Eastern Daylight Time on this 23rd day of May 2025.

Chris Wright
Secretary of Energy

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

Michigan Public Service Commissioners
Chairman Dan Cripps
Commissioner Katherine Peretick
Commissioner Alessandra Carreon

Attachment D
Order No. 202-25-7

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

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[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

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[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

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[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] M*idcontinent 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

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[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.

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[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] M*idcontinent 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

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[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]

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[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

Attachment E
Order No. 202-25-9

Department of Energy
Washington, DC 20585

Order No. 202-25-9

Pursuant to the authority vested in the Secretary of Energy by section 202(c) of the Federal Power Act (FPA),[1] and section 301(b) of the Department of Energy Organization Act,[2] 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 Nos. 202-25-3 and 202-25-7

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.[3] 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. Subsequently, Order No. 202-25-7, issued pursuant to FPA section 202(c), required that the Campbell Plant remain in operation for 90 days, until November 19, 2025. Those orders were 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

[1] 16 U.S.C. § 824a(c).
[2] 42 U.S.C. §7151(b).
[3] *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/newsrelease-details/2021/06/23/consumers-energy-announces-plan-to-end-coal-use-by-2025-lead-michigans-cleanenergy-transformation.

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."[4] In particular, NERC explained that the retirement of thermal generation capacity increased the likelihood of electricity supply shortfalls. NERC anticipated that the near-term period of greatest capacity shortfall for MISO would likely occur in August.[5]

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."[6] 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."[7] The state's Big Rock Point nuclear power plant shut down in 1997, and the Palisades nuclear power plant closed in 2022. The Palisades plant remains unavailable, although according to a recent news report, "Holtec International expects the Palisades plant in Michigan to resume service early next year…."[8]

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."[9]

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 include Michigan, "new capacity additions were insufficient to offset the negative impacts of decreased accreditation, suspensions/retirements and external resources."[10] While the results "demonstrated sufficient

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[4] *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).

[5] *Id.*

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

[7] *Id.*

[8] *Nuclear plants face decadelong timeline to meet AI energy needs,* Los Angeles Times. (Nov. 13, 2025), https://www.latimes.com/business/story/2025-11-13/despite-80-billion-commitment-nuclear-plants-face-decade-long-timeline-to-meet-ai-energy-needs.

[9] NERC 2025 Summer Reliability Assessment at 16.

[10] *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).

capacity," the summer months reflected the "highest risk and a tighter supply-demand balance" and these results "reinforce the need to increase capacity."[11]

Continuing Emergency Conditions

The emergency conditions that led to the issuance of Order Nos. 202-25-3 and 202-25-7 continue, both in the near and long term.[12] The production of electricity from the Campbell Plant will continue to be a critical asset to maintain reliability in MISO. According to the U.S. Environmental Protection Agency's data, the plant has generated an average of approximately 509,000 MWh per month, from June 2025 through September 2025,[13] providing vital generation capacity to the region. Additionally, between June 11 and November 5, 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's year-round resource adequacy concerns are well documented. 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.[14] MISO justified this revision by explaining that "Reliability risks associated with resource adequacy have shifted from 'Summer only' to a year-round concern."[15] MISO noted that over 60% 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.[16]

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."[17] Among other things, this report described changes in the time of year during

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[11] *Id*. at 2,12. For further information regarding the determination that emergency conditions existed, *see* Order No. 202-25-7.

[12] Further, as noted in Order No. 202-25-7, 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. In addition, other practical issues, such as employment, contracts, and permits may greatly increase the timeline for resumption of operations. Further, if Consumers were to begin disassembling the plant or other related facilities, the associated challenges would be greatly exacerbated. Thus, continuous operation is required in such cases so long as the Secretary determines a shortage exists and is likely to persist.

[13] *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, July, August, September." The data can then be filtered to only include the JH Campbell Plant.)*

[14] M*idcontinent 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).

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

[16] Id. at 3-4.

[17] *Attributes Roadmap*, MISO (Dec. 2023), https://cdn.misoenergy.org/2023%20Attributes%20Roadmap631174.pdf

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.[18]

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."*[19] 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.[20]

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

While the 2025 – 2026 NERC Winter Reliability Assessment has not yet been released as of the date of this Order, two recent winter studies (2024 – 2025 NERC Winter Reliability Assessment[21] and the 2023 – 2024 NERC Winter Reliability Assessment[22]) have assessed the MISO assessment area as an elevated risk, with the "potential for insufficient operating reserves in above-normal conditions." Specifically, the 2024 – 2025 Winter Reliability Assessment noted that "[ge]nerating capacity is 10 GW lower (-6.8%) compared to the prior winter as generators have retired, withdrawn from MISO's capacity market, or received lower winter accredited capacity."[23]

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

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[18] *Id.* at 11.

[19] *MISO's Response to the Reliability Imperative*, MISO (Updated Feb. 2024), https://cdn.misoenergy.org/2024+Reliability+Imperative+report+Feb.+21+Final504018.pdf

[20] *Id.* at 12.

[21] 2024 – 2025 NERC Winter Reliability Assessment at 5, https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2024.pdf

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[23] 2024 – 2025 NERC Winter Reliability Assessment at 15, https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2024.pdf

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[26] *Id.* at 2.
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[32] 192 FERC ¶ 61,064 at P 84.

likely to further hinder rapid construction and exacerbate reliability concerns.[33] Consequently, the new ERAS process is unlikely to result in the addition of any new generation capacity in the next few years.

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[33] *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."

[34] 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-reliabilityand-security-of-the-united-states-electric-grid/.

[35] 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/.

[36] *Id*.

[37] *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.

[38] 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.

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 . . . ."[39]

Grid operators — including MISO itself — have also 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 changing characteristics of the electric generating fleet, inadequate transmission system infrastructure, growing pressures from extreme weather, and rapid load growth."[40] 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."[41] 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."[42]

Pursuant to section 202(c)(4)(B) of the FPA, the Department has consulted with the primary Federal agency with expertise in the environmental interest protected by the laws or regulations that may conflict with this Order. The agency did not submit additional conditions for inclusion in this Order.

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."[43] 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

[39] *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-toprovide-1gw-of-power-to-new-hyperscale-data-center/ (quoting Consumers Energy CEO Garrick Rochow).
[40] 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://democratsenergycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov/files/evo-mediadocument/witness-testimony_curran_eng_grid-operators_03.25.2025.pdf
[41] *Id.* at 6.
[42] *Id.* at 7.
[43] 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).

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 shortage from accelerated retirements of generation facilities supporting the issuance of Order Nos. 202-25-3 and 202-25-7 will continue in the near term and are also likely to continue in subsequent years. This could lead to the loss of power to homes and local businesses in the areas 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 increased demand and determined shortage 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 February 17, 2026.[44]

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

A. From November 19, 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.

[44] 16 U.S.C. § 824a(c)(4).

D. By December 3, 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, as needed. 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 Standard Time (EST) on November 19, 2025, and shall expire at 00:00 EST on February 17, 2026, with the exception of applicable compliance obligations in paragraph D.

Issued in Washington, D.C. at 5:58PM EST on this 18th day of November 2025.

Chris Wright

Chris Wright
Secretary of Energy

cc:

FERC Commissioners
Chairman Laura V. Swett
Commissioner David Rosner
Commissioner Lindsay S. See
Commissioner Judy W. Chang
Commissioner David A. LaCerte

Michigan Public Service Commissioners

Chairman Dan Scripps
Commissioner Katherine Peretick
Commissioner Shaquila Myers