

March 11, 2025

The Honorable Chris Wright
Secretary
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Secretary Wright:

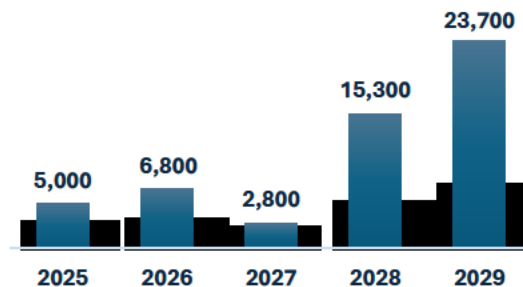
I am writing on behalf of America's Power to seek assistance from the Department of Energy (DOE) in preventing the retirement of more coal-fired electric generating units. America's Power is the only national trade association whose sole mission is to advocate for the nation's coal fleet, which totals 370 electric generating units that represent approximately 175,000 megawatts (MW) of generating capacity. Our membership is comprised of electricity generators, coal producers, equipment manufacturers, and companies that transport coal (collectively, the coal supply chain).

As you know, the nation's coal fleet and a healthy supply chain are essential to maintaining a reliable, affordable, and resilient electricity supply. The coal fleet provides essential reliability services, helps stabilize electricity prices, provides energy security, possesses a high capacity value, has demonstrated its resilience during extreme weather, and is capable of providing substantial amounts of electricity to meet exploding electricity demand.

We commend President Trump for issuing the Executive Order "Declaring a National Energy Emergency" (EO) that calls attention to our nation's "inadequate energy supply," an "increasingly unreliable grid," and the need for "swift and decisive action" to remedy these problems. Premature coal retirements are one of the major reasons for this energy emergency. The following facts show the gravity of the situation:

- Forty (40) percent of the nation's coal fleet (769 generating units totaling 141,000 MW) has retired since 2010. Of this total, 43,300 MW (137 units) retired during 2020-2024.
- Electricity generators have announced plans to retire an additional 53,600 MW of coal (118 generating units) during 2025-2029. Retirements increase dramatically in 2028 and 2029 (chart).

*Nationwide Announced Coal Retirements (MW)
During the Next 5 Years*



- This is the same 5-year period during which the North American Electric Reliability Corporation’s (NERC) Long-Term Reliability Assessment (December 2024) projects that half the U.S. will be at either “high” or “elevated” risk of electricity shortages.
- The bulk of announced coal retirements – 52 generating units totaling more than 31,000 MW – will occur over the next 5 years in three regions: MISO (“high” risk of shortages), PJM (“elevated” risk of shortages), and SPP (“elevated” risk of shortages).
- Recognizing their urgent need for coal-fired generation, utilities have announced plans to delay 26,000 MW of coal retirements primarily because of load growth and reliability concerns. (These are excluded from the retirement numbers above.) These delayed retirements are necessary but obviously not sufficient to prevent a national energy emergency from continuing.

Repealing or rewriting a number of EPA regulations could reverse some of these announced retirements. However, these regulations must be repealed as quickly as possible to prevent electricity generators from being forced to make irreversible compliance decisions that could lead to even more premature coal retirements.

Besides regulatory reforms, some form of economic support is also essential to preserve coal-fired generation. For example, the General Services Administration entered into a contract in January 2025 to purchase 10 million megawatt-hours of nuclear power over a period of 10 years. A similar arrangement to purchase coal-fired electricity would provide much needed support to the coal fleet and would be consistent with the mandate in the EO to remedy the vulnerabilities resulting from inadequate energy and electricity.

In addition, a DOE order pursuant to Section 202(c) of the Federal Power Act (FPA) could prevent the premature retirement of certain coal units. Section 202(c) provides that:

[W]hensoever the [Secretary 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 ... the [Secretary of Energy] shall have authority ... to require by order such temporary connections of facilities and generation, delivery, interchange, or transmission of electric energy as in [the Secretary’s] judgment will best meet the emergency and serve the public interest.

DOE has issued Section 202(c) orders and extensions of orders more than 20 times since 2000. While most of these orders were issued for only a few days due to extreme weather, Section 202(c) allows the Secretary of Energy to direct the continued operation of specific coal units for longer periods of time as well as to mandate payments to ensure their availability because of national security risks or the resource adequacy risks identified in NERC’s annual Long-Term Reliability Assessments such as the one mentioned above.

In addition, DOE could act pursuant to Section 101(a) and (c) of the Defense Production Act (DPA) because of the need for adequate power supplies to promote the national defense. Contracts that preserve the coal supply chain for national defense purposes are justified under the DPA as well.

The EO directs agencies and departments and agencies to “identify and exercise any lawful emergency authorities available to them ...” We believe that use of the authorities above is consistent with this directive. We would welcome the opportunity to discuss these and other potential solutions with you.

In the meantime, please contact me at MBloodworth@AmericasPower.org or Paul Bailey at PBailey@AmericasPower.org if you or your staff have any questions.

Sincerely,

A handwritten signature in black ink, reading "Michelle A. Bloodworth". The signature is fluid and cursive, with the first name "Michelle" being more prominent.

Michelle Bloodworth
President and CEO

Copy to:

The Honorable Steve Winberg
Under Secretary for Infrastructure