

Anderson, Katrina

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Monday, August 25, 2025 8:56 AM
To: Young, Brad; Council Members
Cc: County Executive; Carrera, Nicholas; Planning Commission
Subject: Where will data centers be?

[EXTERNAL EMAIL]

Council Pres Brad Young and Members of County Council,

I don't want to criticize unfairly the work of the Council and the County Executive, so I need to know before your Tuesday meeting if I'm missing something in our current and proposed data center legislation.

Current legislation on data centers is Bill 25-05, approved by CE Fitzwater on May 29. Draft Bill 25-09, when passed and approved, will amend Bill 25-05. The result would presumably codify the compromise announced jointly by CE Fitzwater and the entire Council on May 6, which would, in order to avoid data center sprawl, *"limit where data centers can be built to the area around the old East Alcoa property north of Adamstown,"* and would *"limit the development to less than 1% of the County's total land mass."* But I can find neither limitation stated in Bill 25-05 or in draft Bill 25-09. Where are they? Am I missing something??

Thank you for your speedy (I hope) response.

Nick Carrera, 2602 scenic Thurston Road, Frederick.

Anderson, Katrina

From: Ann Andrex <andrexes@comcast.net>
Sent: Monday, August 25, 2025 4:00 PM
To: Council Members
Cc: County Executive; Planning Commission
Subject: CDI overlay zone

[EXTERNAL EMAIL]

What do you Council members, that voted against the CDI overlay zone, know that you are not telling us? What are you trying to do to us in Frederick County? I do not want to look or feel like Montgomery County or Northern Virginia...I have lived in both of those places. They are overcrowded and polluted and unfriendly.

The point of a CDI Overlay Zone is to eliminate the current right developers have to build data centers on any industrially zoned property in the county as long as they meet general LI or GI criteria. The legislation would allow data centers to be built next to residential areas that is, HOMES. **The Council majority voted against protecting homes. The Council majority voted against protecting designated Priority preservation Areas (PPA), Rural Legacy Areas (RLA), or Treasured Landscape Management Areas. The Council majority voted against protecting farms. This is all tragic and I do not agree with these votes AT ALL.**

I do not support data center sprawl.

Where's the objective economic analysis?

The fox is designing the hen house. Where are the citations for their claims? Where is the objective analysis of energy use, water use, sewage disposal, greenhouse gases, noise and light impacts, climate and health impacts?

AnnChristine Andrex

Hang on to your hat. Hang on to your hope. And wind the clock, for tomorrow is another day.

—E.B. White

Anderson, Katrina

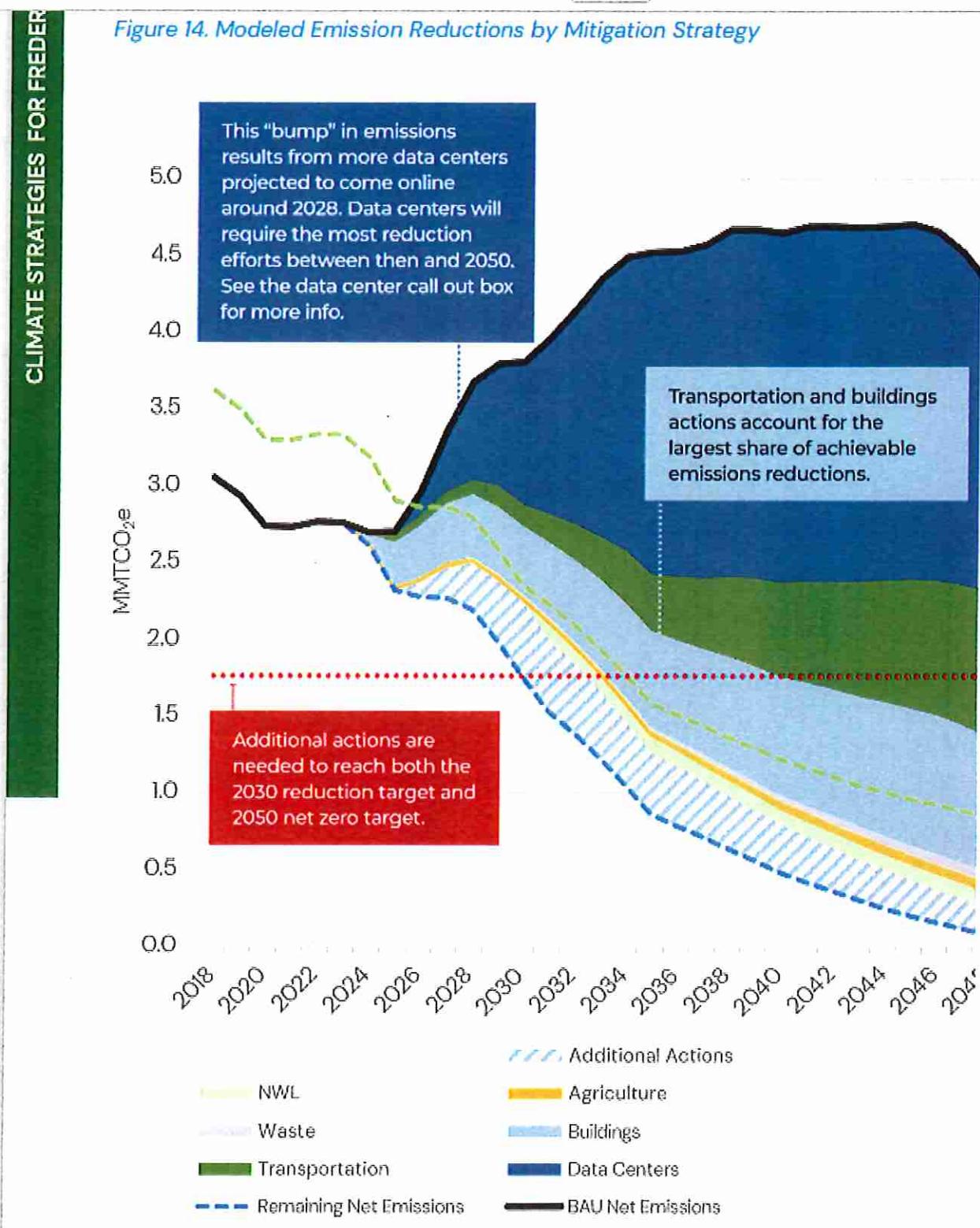
From: Sonia Demiray <sonia@demirayink.com>
Sent: Monday, August 25, 2025 4:08 PM
To: Council Members; Young, Brad; Duckett, Kavonte; Keegan-Ayer, MC; Carter, Mason; Donald, Jerry; McKay, Steve; Knapp, Renee; County Executive; Planning Commission
Subject: Comments for 25-09 CDI Overlay on 8/26

[EXTERNAL EMAIL]

Dear Members of the Frederick County Council:

Please look at this graphic on page 45 of the Draft Frederick Climate and Energy Action Plan ("CEAP").

Figure 14. Modeled Emission Reductions by Mitigation Strategy



When the Data Centers kick in, around 2027, emissions sky-rocket by 38%. This makes our clean-energy transition, the one single thing we must absolutely do right now to halt climate change and provide a safe and healthy future for our children, impossible. Make no mistake: Climate Change is deadly. Any hypothetical profit the county may obtain does not justify poisoning our environment, our communities, overextending (already limited) natural resources, and worsening climate change. Note that the limited boilerplate actions the CEAP mentions to make data centers "sustainable" are also harmful and driven by fossil fuels: Gas (CH4) is 84 times more potent at trapping heat than even CO2 over the first 20 years of its life (these are critical years for global climate action) or Combined Heat and Power (CHP), based around combustion of biomass, is even more polluting than coal per unit of energy produced.

Governor Moore is wrong in his approach: "Speed!"; "Veto of the bipartisan data center impact study bill!"; "Cut red tape!". As our representatives, you must respect the processes and the permits that protect the communities that elected you. We should have environmental and economic impact studies. We should not rezone land to increase pollution. We should not have data centers close to any community, let alone elementary schools and retirement homes.

Stop the expansion of the Data Centers. Protect the residents of Frederick County. Please do not sacrifice our *vital* clean energy transition.

Thank you.

Sonia Demiray

1401 Jefferson Pike.

Sonia Demiray

Climate Communications Coalition

202-744-2948

ClimateCC.org

Anderson, Katrina

From: Darlene Bucciero <djbucciero@msn.com>
Sent: Monday, August 25, 2025 4:46 PM
To: councilmembers@frederickcountymd.gov
Cc: County Executive; Planning Commission
Subject: CDI Overlay Zone Text (Bill 25-09)

[EXTERNAL EMAIL]

Dear Frederick County Councilmembers,

While I am disappointed Bill 25-09 does not adequately protect residents, homes, schools, churches, farms, and other sensitive areas, an Overlay Map could still help mitigate these issues. Failing to restrict data centers to industrial zones suggests that more is better. Data center industry proponents continue to tout revenue numbers that sound seductive to county and state government, but the proponents don't cite costs. Why not? The county will incur expenses, and we think the costs will be higher than the projected revenue. The current locally focused data center studies are provided by industry consultants—akin to the fox designing the hen house. Where are the citations for their claims? Where is the objective analysis of energy use, water use, sewage disposal, greenhouse gases, noise and light impacts, and the effects on climate and health? It is already fact that data centers use a significant amount of energy and water resources that restrict the capacity for the surrounding community, which in turn increases the costs for County residents. This is simple supply and demand economics. Additionally, data centers are also very new technologically based structures that may have unforeseen circumstances to the local economy and environment that we cannot predict at this time.

Why wouldn't the County be more conservative in their approach to approving more data centers to protect Frederick County residents, their property values and the environment? Please restrict the data centers to industrial zones as part of the proposed CDI Overlay Zone.

Darlene J. Bucciero

Anderson, Katrina

From: Patrice Gallagher <pgallj@aol.com>
Sent: Monday, August 25, 2025 11:56 PM
To: Council Members
Cc: County Executive; Planning Commission
Subject: CDI Overlay Zoning

[EXTERNAL EMAIL]

Hello Council members,

I hope you will take these requests into consideration, regarding the data centers that will be a part of Frederick County.

1. Consider the climate when thinking about how many data centers Frederick County will host.

Our County had been making great progress on GHG emissions reductions, but data centers will only worsen our County's emissions levels.

I recall this from a presentation by County staff very early in the Data Center Workgroup meetings. The current draft of the CEAP report says the same.

In light of these facts, it makes sense to limit data center acreage to the already-approved Eastalco site, until we figure out how to limit data center emissions, as well as their water use.

2. We've been told that data centers will benefit our County. Please commission a study that will tell all of you, and Frederick's citizens, what the benefits AND the costs will be.

I believe it's irresponsible stewardship of County resources not to do a thorough comparison of pros and cons as soon as possible, before we go very far down the data center development path.

Last week's hearing was disappointing. There were some good opportunities to compromise on amendments for the sake of those who live in Adamstown. I was surprised not to see more empathy for the folks who live there.

Thanks, Steve McKay and Jerry Donald. You — and the Planning Commission — were listening to Frederick's residents.

Patrice Gallagher
City of Frederick

Patrice Gallagher
Gallagher Design
www.patricegallagher.com
102 W Church Street
Frederick MD 21701
301.471.3720

Anderson, Katrina

From: Theresa Furnari <tafurnari10@gmail.com>
Sent: Tuesday, August 26, 2025 2:21 PM
To: County Executive
Subject: Overlay Legislation
Attachments: Letter to ED, CC, PC 8-25-25.docx

[EXTERNAL EMAIL]

Good Afternoon:

Please find a comment about the data center overlay legislation.

Thank you.

Theresa Furnari

Sent via Email on August 26, 2025

County Executive Jessica Fitzwater
Members of the County Council
Members of the Planning Commission

Dear, County Executive, Members of the County Council and Planning Commission:

This past weekend I was in Loudoun County and saw up close the masses of Data Centers. Countless behemoth structures with no windows reaching high into the sky. Surrounding the buildings are 6 lane roads. And this is in an urban setting. I could not imagine what it would look like in the bucolic setting of South Frederick County.

But with every decision that has been made thus far, it convinces me that the situation in Loudoun County will be duplicated in Frederick County. Currently Loudoun County has just over 1500 acres dedicated to data centers. Currently Frederick County has 1600 acres zoned for data centers. However, despite the countless reasons put forth by Frederick County residents not to expand the industrial zone area, this Council seeks to increase it by at least approximately 900 acres. How can this Council propose such an expanse of data centers without changing the whole complexion of South Frederick County?

If you have done so already, I implore you to go to Loudoun County and see for yourself. Such a configuration of buildings does not belong in Frederick County. Neither the land, the resources nor its people can survive under such conditions.

Thank you.

Theresa Furnari
Jefferson, Maryland

Anderson, Katrina

From: Elyse Wilson <elysewilsonkhk@gmail.com>
Sent: Thursday, August 28, 2025 11:31 PM
To: Planning Commission; Council Members; STEVE MCKAY; Donald, Jerry; Livable Frederick; Michael Kuykendall; Jordan C. Ritter; Josh Mitchell, P.E.; Linda Everett
Subject: Request for Action: A Plan to Safeguard Adamstown Home Values

[EXTERNAL EMAIL]

Good day,

We are writing to formally request information on what specific, proactive measures Frederick County is implementing to protect the property values of your constituents in Adamstown?

The massive scale of the data center development has created significant and valid concern among residents that our home values are at risk of a substantial decline. This is not an unfounded fear; it is based on the well-documented negative impacts on residential property values in communities like Loudoun County, Virginia, where homes adjacent to data center campuses have seen their values stagnate or fall.

Residents' homes are their single largest financial asset, and they also represent a critical component of Frederick County's tax base. Allowing this tax base to be eroded by unchecked industrial development would be a profound failure of fiscal oversight and a dereliction of duty to the citizens of this community.

Therefore, we ask for a clear, actionable plan that addresses the following:

- **Property Value Guarantees:** What financial mechanisms or assurances can the county provide to residents whose property values are negatively impacted by their proximity to these industrial facilities?
- **Tax Assessment Strategy:** How will the county's assessment process be adjusted to ensure that the tax burden does not unfairly fall on homeowners whose property desirability is decreasing?
- **Direct Community Compensation:** What steps are being taken to negotiate Community Host Agreements that provide direct financial compensation to the affected community to offset the loss of value and amenities?

Simply stating that data centers increase the commercial tax base is an inadequate response. That revenue is meaningless to a family that sees its life savings and primary investment depleted. We expect a detailed strategy from our elected officials on how you will actively protect the homeowners of Adamstown from the financial destruction witnessed in other data center communities.

We need A Partnership Opportunity to Build a True Community in Adamstown

As Adamstown accommodates the significant new data center developments, we have a unique, one-time opportunity to define the future character of our community. While we appreciate discussions about parks and open spaces, we must be clear: **a park with a few extra benches is not enough** to

maintain a vibrant, desirable community in the face of such large-scale industrial development. The long-term success of your project is tied to the health of the community you are joining.

To that end, we propose a forward-thinking investment in our town's social infrastructure. Adamstown currently lacks the basic civic cornerstones that create a sense of place and foster a strong community:

- **Adamstown has no Community Center:** We lack a central indoor space for residents of all ages to gather, for local groups to meet, and for community events to be held.
- **Adamstown has no Library:** Our residents, especially children and seniors, do not have local access to the educational resources, digital tools, and community programming that a modern library provides.
- **Adamstown has no Civic Identity:** We don't even have a simple sign that says, "Welcome to Adamstown," to greet residents and visitors.

A passive park will not attract new families or retain current residents who are concerned about living alongside the largest data center campus on the continent. A tangible investment in community facilities will.

A Proposal for a Lasting Partnership

We ask Catellus to partner with the community to address these needs. We propose that the undeveloped parcel you own adjacent to the **Bauxite II** site be designated for the development of a new **Adamstown Community Center and Library**.

This is not just a request for a building; it is an invitation to become a true community partner. An investment in a community center is an investment in the property values, the quality of life, and the civic pride of Adamstown. It demonstrates a commitment that goes beyond fulfilling basic land-use requirements and helps create a town where people will still want to buy a home and raise a family for decades to come.

How can we work together to make this vision for a complete Adamstown a reality? We look forward to your response.

We look forward to your substantive reply.

The Residents of Adamstown

Anderson, Katrina

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Friday, August 29, 2025 9:46 AM
To: Council Members; County Executive; Planning Commission
Subject: Comments at 8/26 Council meeting with additional note, for the record
Attachments: County Council 8.26.25.Rev.doc

[EXTERNAL EMAIL]

To: Council Members, County Executive, and Planning Commissioners,

I'm submitting the remarks I made at the 8/26 Council meeting, with an additional note that I consider important as part of the record. The text is copied below, and is included as an attachment, in case that is easier to handle.

Best Regards, Nick Carrera, scenic Thurston Road.

Begin text of 8/26 comments with additional note:

Comments sent for the record, 8/28/25, with additional note

I'm Nick Carrera, 2602 scenic Thurston Rd, Frederick

In March 2021, County Executive Gardner delayed releasing the Sugarloaf Treasured Landscape Plan while she and her staff worked secretly on a map that identified five locations for data centers. Officials have not disowned this map, and conflicting concerns can be traced to it. Citizens worry about too many data centers and data center sprawl; and landowners worry they won't profit from selling their land for data centers. *(Note)

On May 6, CE Fitzwater and the County Council appeared to settle this conflict in announcing:

"a compromise to limit where data centers can be built to the area around the old East Alcoa property north of Adamstown," and said further, "The compromise will limit the development to less than 1% of the County's total land mass"

So, two promises: First, to county citizens, that data centers will be only around the old East Alcoa property. Second, to landowners, that up to 1% of the county could be devoted to data centers.

How does the bill meet these promises?

Section 11, paragraph 4, page 9, says the CDI Overlay Zone "shall include less than 1% of the total land area of the County." That meets the second promise; what about the first, to limit data centers to the area around the old East Alcoa site?

Under paragraph "(B) Size and location," page 5 it says CDI use may be only "within the CDI Overlay Zone." Then in Division 11, paragraph (B) on page 8 says, "Establishment of CDI Overlay Zone," not "the CDI Overlay Zone." Subparagraph (1) then begins, "A CDI Overlay Zone" This mix of article use is

ambiguous, plus there is no explicit tie to the old East Alcoa area. The current draft Overlay map is at East Alcoa, but what's to stop a future Council from creating additional Overlay Zones?

A simple change would fix this. In paragraph (B), page 5, you could add a new subparagraph (1), something like: "CDI use shall be confined to one area, around the old East Alcoa site north of Adamstown, and defined by an Overlay Zoning map." It's not too late for such a change.

End of comments at 8/26 Council meeting.

**Note added, because this map has been and may still be relevant if data center sprawl occurs:*

The map is labeled, "CDI Floating Zone, Draft March 12, 2021." In her 3/12/2021 email to Kimberly Brandt, Michael Wilkins, Rick Harcum, Helen Propheter, Steve Horn, Gary Hessong, and Margaret Nusbaum, County Executive Jan Gardner says, "I like this version a lot better." The map is in the county records, and can also be found on the Sugarloaf-Alliance.com web site by accessing "Data Centers/Data Centers Floating Zone Map." Related emails are at "Read the County Documents."

Comments sent for the record, 8/28/25, with additional note

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Anderson, Katrina

From: Madelle Tolbert <madgott@yahoo.com>
Sent: Sunday, August 31, 2025 8:30 PM
To: Planning Commission
Subject: Fighting back against data centers, one small town at a time

[EXTERNAL EMAIL]

Please listen to the noise from just one data center in Loudon County. If you scroll down until you see a picture of a center behind some trees and press on it you'll hear just what your constituents will be living with multiplied by 10 - 20 or more centers.

Fighting back against data centers, one small town at a time

<https://www.washingtonpost.com/technology/2024/10/05/data-center-protest-community-resistance/>

[Sent from Yahoo Mail for iPhone](#)

Anderson, Katrina

From: Adamstown Resident <residentadamstown@gmail.com>
Sent: Thursday, August 28, 2025 11:48 PM
To: Planning Commission; Council Members; STEVE MCKAY; Donald, Jerry; Livable Frederick; Murray, Patrick
Subject: Urgent Inquiry: A Proactive Strategy to Protect Adamstown Property Values

[EXTERNAL EMAIL]

To: Frederick County Council & Office of Economic Development

Dear County Leaders,

We are writing to formally request information on what specific, proactive measures Frederick County is implementing to protect the property values of your constituents in Adamstown.

The massive scale of the data center development has created significant and valid concern among residents that our home values are at risk of a substantial decline. This is not an unfounded fear; it is based on the well-documented negative impacts on residential property values in communities like Loudoun County, Virginia, where homes adjacent to data center campuses have seen their values stagnate or fall.

Residents' homes are their single largest financial asset, and they also represent a critical component of Frederick County's tax base. Allowing this tax base to be eroded by unchecked industrial development would be a profound failure of fiscal oversight and a dereliction of duty to the citizens of this community.

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We look forward to your substantive reply.

Sincerely,

The Residents of Adamstown

Anderson, Katrina

From: Jennifer Cebrat <jacebrat@comcast.net>
Sent: Friday, August 29, 2025 8:04 AM
To: Planning Commission; Council Members; stevemckay@comcast.net; Donald, Jerry; Livable Frederick; Murray, Patrick
Subject: Urgent Inquiry: A Proactive Strategy to Protect Adamstown Property Values

[EXTERNAL EMAIL]

To: Frederick County Council & Office of Economic Development

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We look forward to your substantive reply.

Sincerely,
The Residents of Adamstown

Anderson, Katrina

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Sunday, August 24, 2025 8:00 AM
To: Council Members; County Executive; Planning Commission
Subject: Fwd: Why Northern Virginia May Face Hundreds of Hours Without Electricity
Attachments: Evaluating Grid Reliability (July 2025).pdf

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL]

There's an interesting picture at the start of the first article. Separation of 500 feet and height of 75 feet is much better than what they have in Virginia, but without somehow "scaling" the picture, it's hard to see just how much better.

Nick Carrera

- 1. Insist the Board of County Supervisors rescind its motion to stay the effect of the judicial order invalidating the Prince William Digital Gateway rezoning. E-mail the BOCS here: [Send emails: Rescind the 'Stay' – The Coalition to Protect Prince William County](#)**



Wrighteous Indignation

Friends and Neighbors,

I can't ever bear to comment on how badly government is failing us at every level. The articles below don't exactly fill you with confidence about the judgment and spines of our state and local officials.

The first article below states: "Northern Virginia could face more than 400 hours of power outages a year by 2030" and "We're only in an energy crisis because our utilities and the data center industry have agreed to contracts without any state oversight".

The second article states how PJM's independent monitor is now calling for all future data centers in PJM territory to bring their own generation for electrical power. This is a stunning development.

This dramatic recommendation is based on the lack of electricity for data centers throughout the 14 PJM states. It is especially pronounced in Virginia, more than any other state in the PJM service area.

It is not just a few of us local citizens claiming the power is not there. It is an independent expert institution that is responsible for monitoring the PJM grid. Note also the statement about rising electricity prices for "other PJM customers."

The last piece shows that citizens and environmental groups are clawing back. It remains to be seen how long the suits can ignore increasing public outrage over their fecklessness.



*Once the camel's nose got under the tent,
no tent was safe from nosy camels.*



AI's Growing Power Bill: Why Northern Virginia May Face Hundreds of Hours Without Electricity

By Uriah Kiser

August 5, 2025

[\(AI's Growing Power Bill: Why Northern](#)

[Virginia May Face Hundreds of Hours Without Electricity\)](#)

[\(AI's Growing Power Bill: Why Northern](#)



Village Place Technology Park in Gainesville, approved by the Prince William Board of County Supervisors in 2022

Northern Virginia could face more than 400 hours of power outages a year by 2030, according to a new report from the U.S. Department of Energy, raising alarms about the region's ability to keep up with the explosive growth of artificial intelligence and data centers.

The **attached report**, released in July, highlights a significant imbalance: while demand from AI infrastructure and data centers is expected to surge by 50 gigawatts nationally, the U.S. is retiring 104 gigawatts of firm generation—like natural gas and coal plants—with only 22 gigawatts of firm replacement power planned. The gap puts pressure on the electric grid and raises the risk of prolonged outages across the country.

Nowhere is the crisis more acute than in the PJM Interconnection region, which includes much of Virginia. Under a scenario where older plants continue to close, PJM's "Loss of Load Hours" could spike from 2.4 hours a year to 430 by the end of the decade. Northern Virginia, already home to the world's largest data center market, is a major driver of that demand.

Julie Bolthouse, Director of Land Use for the Piedmont Environmental Council, said these problems are the result of private contracts—not a natural energy shortfall. See **[video](#)**.

“We’re only in an energy crisis because our utilities and the data center industry have agreed to contracts without any state oversight,” Bolthouse said in a recent interview. “This is an artificial crisis.”

She noted that much of the new demand—estimated at 15 gigawatts in PJM South alone—is tied to data centers that haven’t been built yet. Delaying power delivery for those projects could help ease pressure on the grid, she said, but only if decisions are made soon.

“If they start to build those other buildings that aren’t started already, then they become vested,” Bolthouse said. “Then it becomes harder to push back their in-service dates.”

Bolthouse warned that *utilities like Dominion Energy have continued to build out infrastructure at a rapid speed, with costs passed directly to ratepayers.* She pointed to Ohio, where a utility temporarily halted new connections over reliability concerns, as an example of how Virginia might respond—through either a utility-imposed pause or government regulation.

The Department of Energy also framed the issue as a matter of national security, arguing that failure to meet AI infrastructure needs could allow adversaries to gain control of digital systems and norms. *Bolthouse sees that framing as a justification to fast-track new fossil-fuel infrastructure, including backup diesel generators, pipelines, and gas plants.*

“We now have over 9,000 diesel generators permitted in Virginia, mostly in Loudoun and Prince William counties,” she said. “*If those start running during peak demand, that’s going to massively deteriorate our air quality.”*

Rather than racing to build more, Bolthouse said Virginia should prioritize sustainable siting, efficiency standards, and upgraded transmission using renewable sources. She noted that the state already has 265 million square feet of approved data center space—much of it not yet built or powered.

“We need to stop putting these on top of our parks, schools, and neighborhoods,” she said. “And the industry needs to shift away from speed and scale being its top priorities.”

Bloomberg

Data Centers Need Own Power Supply, US Grid Watchdog Says

Monitoring Analytics' latest quarterly report recommends requiring large data centers to provide their own power generation.

Naureen S. Malik Bloomberg News
[Power Supply, US Grid Watchdog Says](#)

August 18, 2025

([Data Centers Need Own](#)

Data centers looking to connect to the largest US grid must bring their power supply, the system's independent watchdog said.

The warning escalates the watchdog's position from just a month ago when it said the grid operated by PJM Interconnection LLC, stretching across 13 states from Virginia to Illinois, has no spare supply for new data centers and suggested developers build their own power plants.

However, in its quarterly report released August 14, watchdog Monitoring Analytics said it "recommends that large data centers be required to bring their own generation."

The grid is home to the highest concentration of data centers whose soaring power demand has strained aging infrastructure, driven up costs for consumers and become a political flashpoint.

"The current supply of capacity in PJM is not adequate to meet the demand from large data center loads and will not be adequate in the foreseeable future," the report said. "There is still time to address the issue but failure to do so will result in very high costs for other PJM customers."

PJM said in a statement that it's working with all its stakeholders, including the market monitor, to address the imbalance of supply and demand, which it said was primarily driven by unprecedented growth in electricity use.



The SCC swallows Dominion's IRP and serves stakeholders a nothingburger

It would be hard to imagine a less enthusiastic endorsement than the SCC's in its final ruling of Dominion's latest IRP, columnist Ivy Main writes, and the lack of analysis leaves advocates wondering, where's the meat?

When Dominion Energy Virginia filed its latest integrated resource plan (IRP) last fall, critics (including me) complained that *the company failed to lay out a cost-effective approach that would meet soaring energy demand from data centers while complying with Virginia's decarbonization mandate*. We hoped regulators at the State Corporation Commission would reject the IRP and demand better of our largest utility.

Instead, they chickened out.

The SCC's [final order](#), issued July 15, is short but not really to the point. The order [finds](#) Dominion's IRP "legally sufficient," while citing previous SCC orders for the proposition that "acceptance" doesn't mean approval "of the magnitude or specifics of Dominion's future spending plans." It would be hard to imagine a less enthusiastic endorsement, and the lack of analysis leaves advocates wondering, where's the meat?

It's true that an IRP is "only" a planning document; it doesn't commit a utility to carrying out the plan, and the SCC still has to approve any project the utility decides to move forward with. But the point of the exercise is to ensure utilities are on the right track; that their demand projections are on target and their plans for meeting demand are realistic, cost-effective and comply with all relevant laws. This needs discussion and analysis, not merely an up-or-down vote.

Admittedly, *the SCC has a long history of approving lousy IRPs while directing Dominion to do a better job the next time*. That was the case here, too, with the order directing Dominion to do a few things differently in its next IRP, due in the fall of 2026.

First, the SCC wants to see a 20-year timeline instead of the 15-year period that Dominion used this year, which is all the law requires. It's an obvious ask, even apart from the fact the SCC cites that the regional grid operator PJM uses a 20-year planning window. A better reason is that we are just 20 years away from Dominion's 2045 deadline for full decarbonization under the Virginia Clean Economy Act (VCEA), and anything the utility does now will have consequences extending out to that deadline.

The SCC also neglected to mention that using just a 15-year window, and omitting the 25-year planning period that Dominion included in previous IRPs, allowed the company to avoid showing the economic consequences to consumers of spending money for fossil fuel generation that either will shut down or may become economically obsolete by 2045, long before the plants are paid off. If Dominion thinks it can justify sinking customers' money into assets it knows will become stranded, we all deserve to see the rationale.

The order also directs Dominion to include in its modeling at least one pathway that complies with the requirement of the VCEA that carbon-emitting facilities (including any new gas plants) be retired by 2045. This goes beyond obvious: the lack of a VCEA-compliant plan should have prompted the SCC to reject the IRP outright.

But of course, *Dominion claims new gas plants are needed for reliability, which would make them legal under the VCEA in spite of their carbon emissions and questionable long-term viability*. Reliability is a red herring, as I've argued, and other parties to the IRP case modeled how Dominion can meet demand without building new fossil fuels. Dominion should have been required to prove its case.

But here again, the SCC chose not to engage on the issue. Requiring Dominion to do better next time is as far as it is willing to go. This is unfortunate, but the silence can't last: in March, Dominion filed for approval of the first of its planned new gas plants. The SCC will have to address need and reliability to make a decision in that case, and it would have been better for all concerned if it had grappled with these questions now.

The order falls short in other ways, as well. While the SCC expresses concern about forecasted rate increases, *it doesn't even mention the data centers that are driving the problem*.

This is astonishing; even before Dominion filed its IRP last fall, the commission ordered the company to supplement the record with an analysis of data center impacts. When Dominion did so, it became clear that all of the load growth (and likely, much of the projected rate increases) results from this one industry. It's beyond strange that the SCC does not even mention the supplement it ordered, or discuss whether Dominion's duty to serve truly prevents it from protecting existing customers.

The order also accepts Dominion's argument that it had to artificially limit the amount of low-cost solar it could include in its modeling, due to the increased difficulty of siting solar projects in Virginia. It's true that many rural counties have been denying permits to solar projects, even as they approve data centers. But I've also heard a Dominion lobbyist tell legislators that permit denials have not been a problem for the company, an assertion that may have persuaded some legislators to vote against bills that would make solar siting easier. It appears Dominion tells legislators one thing and the SCC another.

The SCC's order contains a few other requirements for the next IRP, mostly things that really should have been included in this one. The IRP should model Virginia's return to the Regional Greenhouse Gas Initiative, reflecting a Virginia court's ruling that Gov. Glenn Youngkin's withdrawal was unlawful. The IRP should assume Dominion achieves

the energy efficiency targets that the SCC itself established for the company. Dominion should include an analysis of impacts on base rates and should share its modeling with utility watchdog Clean Virginia, as well as run modeling based on SCC staff inputs. Long-duration storage, a maturing technology that can replace gas combustion turbines, should be included in the next modeling.

“Do better next time” is a well-worn directive from the SCC to Dominion, but it is deeply disappointing at a time when Virginia is facing an unprecedented surge in demand from data centers and accompanying increases in utility rates.

It's disappointing in another way, too: this is the first major ruling from the SCC since two new judges were added to the three-member commission, and all three were appointed by a Democratically-controlled Senate. *If there was ever a time for the SCC to get tough with Dominion on its climate obligations, this should have been it.*

No doubt, the problem lies in Dominion’s influence over the entire process. The utility doles out exceedingly generous campaign donations to members of both parties, so the company retains influence no matter who is in power. Not only does this give Dominion sway over who is appointed to the SCC, but commissioners have to be mindful that getting reappointed at the end of their six-year terms depends on how satisfied these Dominion-backed senators are with their rulings.

As long as Dominion is allowed to shower senators with unlimited campaign cash, the SCC will never be free of the utility’s pernicious influence.

Meanwhile, though, Dominion’s poor performance, and the SCC’s unwillingness to call it out, demonstrate the necessity of the comprehensive IRP reform legislation that the governor vetoed this spring. The Commission on Electric Utility Regulation is already working on similar legislation for the next session.

Passing the IRP reform bill may not inject the SCC with greater courage, but it will ensure the commission, and the public, get a fuller look at the facts.



Is it too hot for common sense?

Heat-addled brains might explain the thinking of many Virginia lawmakers that what we need to do right now is burn more fossil fuels, writes columnist Ivy Main

By Ivy Main

July 8, 2025

([Is it too hot for common sense? • Virginia Mercury](#))

Maybe it's the heat. Heat-addled brains might explain the thinking of many Virginia lawmakers that what we need to do right now is burn more fossil fuels.

Scientists have documented the way high temperatures affect the brain, [impairing cognition](#) and causing [impulsivity and trouble concentrating](#). And this summer is already [starting out hot](#), which is saying something given that 2024 was the [hottest year](#) on record, bumping 2023 off its baking pedestal. Scientists say this global fever is the natural result of burning fossil fuels and driving CO2 levels to their highest in [millions of years](#).

Since burning more fossil fuels will drive more global warming, it's exactly the reverse of what we should be doing. Yes, but, these state leaders respond, *how else are we going to power ever more data centers?*

Northern Virginia is the data center capital of the world, and data centers are notoriously power-hungry. Without them, Virginia electricity demand would be flat, and we could easily meet our electricity needs while gradually decarbonizing along the pathway laid out in the [Virginia Clean Economy Act \(VCEA\)](#).

Instead, [Virginia taxpayers subsidize some of the richest corporations in America](#) to the tune of almost [a billion dollars](#) every year to entice them to rip up land in Loudoun, Prince William and other Virginia counties instead of Atlanta or Dallas. In return, the tech companies keep construction workers busy, [underwrite](#) their host counties' finances, make life miserable for nearby residents, [raise everyone's power bills](#), drain our rivers and aquifers and pollute our air with enough diesel generators to light up a major city.

Virginia legislators obviously consider this a fair deal, because that's [what they keep voting for](#). Whether their constituents agree is another question; the evidence [says they don't](#).

For anyone just getting up to speed on data center issues, the Virginia Sierra Club's new [report](#), "Unconstrained Demand: Virginia's Data Center Expansion and Its Impacts"

(to which I contributed), covers the current state of data center development in Virginia and the problems that come with it. Fun fact: *More than half of all the nation's energy consumption attributed to data centers occurs in Virginia.*

That puts a special burden of leadership on our lawmakers. If we allow data centers to undermine our sustainability efforts here, we can only expect a race to the bottom in other states. As Virginia goes, so goes the nation.

And yet we haven't heard much outcry from Virginia leaders against the plans of our largest utility to build new generating plants powered by fracked gas. Dominion Energy [laid out its plans](#) in its 2024 integrated resource plan as well as [a proposal](#) for a 944 megawatts of gas combustion turbines in Chesterfield now pending before the State Corporation Commission.

Dominion and its allies say more gas is needed for [reliability](#), which could make it allowable under the VCEA. Indeed, "reliability" is a word that fossil fuel advocates frequently toss down like a trump card (in the unpresidential sense but with the same lack of thoughtful analysis). The claim is suspect. Fussing about reliability when your state ranks 24th in the nation for renewable energy is like worrying about the taxes you'll owe if you win the lottery: we should be so lucky.

Gov. Glenn Youngkin and Republican legislators are [explicit](#) in wanting to see the VCEA repealed and more gas plants built. Democrats defend the VCEA's goals, but worry about the challenges of implementation and the effect on electricity rates. *They all cite data center demand as the reason they contemplate backsliding on clean energy.*

I wish I could say that our rich and powerful tech companies were aggressively championing carbon-free energy for their data centers in Virginia, but they are not. I attended a meeting of the [Commission on Electric Utility Regulation](#) where legislators were hashing out the problems of too much demand and too little supply. Representatives from the [Data Center Coalition](#) stood in the back of the room, observing but refusing to engage. Out of sight, they successfully lobbied against any bills that would slow the data center boom, force them to absorb more of its costs, or require them to source their own clean energy.

Publicly, many tech companies tout their commitments to decarbonization. Amazon says it even met its goal to run its operations entirely on renewable energy. Yes, and [I'm the Queen of Sheba](#). In fact, these companies are in a fierce competition to develop artificial intelligence as fast as possible. They'd like carbon-free power, but really, they'll take whatever energy they can get wherever they can get it, and even among the industry's best actors, climate now takes [a back seat](#).

Yet the likes of Mark Zuckerberg and Jeff Bezos would not be significantly worse off if forced to meet their climate commitments. Virginia leaders know – or at any rate, they have been exposed to the information, which I realize is not the same thing – that building new fossil gas generating plants is not just bad for the planet but [more expensive](#) than pursuing carbon-free alternatives.

Oh, I know, Congress just [yanked back](#) the federal tax incentives that helped make wind and solar as cheap as it is, one of the myriad ill-considered elements of the big beautiful debt bomb Republicans adopted against everyone's better judgment. (Apparently heat affects spines as well as brains.) With passage of that bill, developers will need to have begun construction on new facilities by this time next year in order to qualify for the existing tax credits.

There will be a mad rush to get construction underway immediately for facilities in the development pipeline. Thereafter, projects on the margin won't get built. But others will, because even the loss of federal subsidies won't destroy solar's [competitive edge](#) against most new-build gas.

Even so, utilities and their customers will [pay higher prices](#) for unsubsidized new renewable energy – as well as for existing fossil fuel generation that will command higher prices in the coming supply crunch. The Clean Energy Buyers Association [estimates](#) that commercial electricity costs in Virginia will be about 10% higher after the phase-out of federal incentives.

A years-long [backlog](#) for orders of gas turbines will further squeeze energy supply and drive up prices for fossil power. On the plus side, the lack of available turbines will make fast-to-deploy solar not just the better option, but sometimes the only option.

I've never understood the conservative love affair with fossil fuels, when today's clean technology is cleaner, cheaper and quicker to deploy. Trump would like to crush wind and solar altogether, which would eliminate [90% of the power capacity](#) waiting to be connected to the grid and catapult the U.S into a serious energy crisis. In addition to much higher power prices, observers warn we would likely see a loss of data centers and other energy-intensive industries to parts of the world that are not on a mission to kill low-cost clean energy.

Well, that would be one way to rid Virginia of the data center scourge.

Fortunately, the worst attacks on solar in Trump's budget bomb did not survive, but the bill should nonetheless serve as a wake-up call for Virginia leaders. With little time left to

secure federal clean energy incentives, our utilities need to acquire all the solar and storage they can right now. With or without data centers, locking in as much fuel-free generation as possible while it's available at a discount is a prudent move to avoid the coming shortages and escalating costs of energy.

As for the tech companies, *lawmakers should embrace the simplest approach to this problem, which happens also to be the one that spares ordinary Virginians from bearing the costs of the data center buildout: shifting responsibility for sourcing electricity onto the companies themselves, and requiring that they live up to their climate claims by making the power they buy carbon-free.*

It's an approach other states can follow, holding Big Tech to the same responsibility no matter where they put their data centers. Certainly the tech titans can afford it; they just won big with massive tax cuts that our poorest residents will pay for.

No doubt they will complain. *Everyone would like somebody else to pay for what benefits them. But Virginians can't afford to subsidize Big Tech, and we don't want to.*

As for those legislators who think we should continue to do it anyway – well, all I can think is, it's got to be the heat.



State Corporation Commission Must Set Fair Rates and Protect Virginia Residents from Subsidizing Data Center Infrastructure

Posted on [July 17, 2025](#) by [Cindy Sabato](#) [\(State Corporation Commission Must Set Fair Rates and Protect Virginia Residents from Subsidizing Data Center Infrastructure – The Piedmont Environmental Council\)](#)

50 Year Old Methodologies No Longer Work for Virginia; PEC urges State Corporation Commission to Adopt Modern Cost Allocation Methodologies and Commonsense Consumer Protections

Warrenton, VA , July 17, 2025 – The Piedmont Environmental Council submitted expert witness testimony to the State Corporation Commission (SCC) regarding the commission's biennial review of Dominion Energy's rates for generation, transmission, and distribution services. ([Read full written submission here](#)).

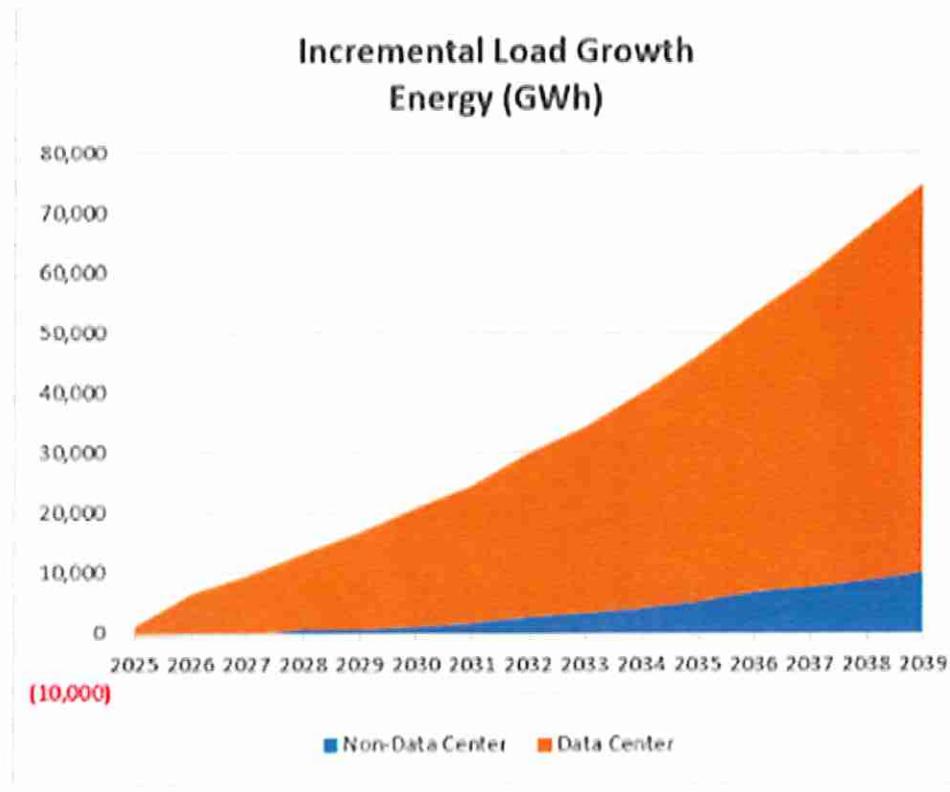
This SCC review is the **first opportunity to address the electricity rate structure for the largest concentration of data centers in the world**. The current rate structure spreads infrastructure costs over Dominion's entire customer base. This means that all ratepayers must pay for the infrastructure data centers require, a financial burden that should not be placed on residents and other businesses.

In the last decade, **the energy demand of data centers has expanded eightfold from 462 megawatts in 2013 to 5.8 gigawatts in 2024**. Today, individual data center projects, which often comprise several massive data center buildings, can demand between 300 MW to 7,000 MW of power, just for a single campus. Dominion Energy recently reported that it has over 40,000 MW of data center capacity in various stages of contracting. That's the equivalent of powering 10 million homes; Virginia currently has approximately 3.4 million households.

Many states are taking action. Ohio, Texas, Minnesota, Georgia, Utah, California and Oregon are pursuing ratepayer protections, and other states have legislation pending. Virginia should be leading this list, as Virginia ratepayers are most at risk of providing massive subsidies to the data center industry, which includes the wealthiest companies in the world.

Northern Virginia has witnessed the rapid and dramatic expansion of data centers over a relatively short period, especially in the past five years. First, they were small enough to fit in one room. Next they expanded to cloud computing and storage. Today, they support the explosive growth of AI, with hundreds of data center buildings larger than Walmart supercenters approved or under review across the state. As much as the number of square feet of data centers has increased, the demand for more energy has grown even faster. **The projected demand is more than our electrical grid is capable of providing.**

The cost of the transmission lines, generation facilities, and substations needed to support approved and projected data centers has been growing dramatically. When the SCC directed Dominion Energy to examine the costs attributable to data centers as part of its 2024 IRP, Dominion's filing showed that data centers are the main reason energy demand is projected to skyrocket in the years ahead (see graph below).



Dominion Energy's 2024 IRP forecasted a cost of approximately \$100 billion to accommodate projected demand increases by 2039. This estimate was based on a projected data center peak load increase of 8 gigawatts by 2039. On a recent investor earnings call, however, Dominion Energy told shareholders that it had 40 gigawatts of data center capacity in various stages of contracting as of December 2024.

"A new approach to assigning costs is in order to replace a rate-setting methodology that Dominion has used for 50 years, in which costs are spread across the entire customer base. The size and scope of data centers and their need for power and energy infrastructure is unprecedented, and the current structure for sharing cost no longer works," said Chris Miller, president of The Piedmont Environmental Council. "The SCC must create a rate structure that more fairly assigns the infrastructure costs to those entities that create the costs. Residents and other businesses should never be saddled with the business expenses of the richest companies in the world."

As part of its biennial review filing, Dominion Energy proposed a **new rate class for high load customers**, defined as those requiring 25 MW or more. This would apply to the majority of existing and planned data centers. PEC agrees it is appropriate for Dominion to place its largest customers in a separate rate class, but demonstrates that the utility's proposal does not go far enough to protect consumers and does not address fundamental flaws with the current allocation of costs.

In direct testimony filed on July 16, PEC's expert witness argued that **Dominion's current methodologies for allocating costs are no longer appropriate in light of the massive changes to Virginia's energy system.** PEC recommends several changes to Dominion's rate structure to ensure that data center customers pay their fair share for the infrastructure they require.

1. **Fairness:** PEC urges the SCC to require transmission and distribution infrastructure costs to be more fairly allocated to data center customers that are driving much of the new infrastructure needed through their excessively high requests for service. Under current regulations, much of these costs are paid for by customers whose electric usage is flat. Everyone pays even when a transmission line is only needed to serve a data center customer.
2. **Methodology:** PEC also recommends that the SCC modify the way electric generation expenses are recovered from customers. The current methodology, which Dominion has used for over 50 years, shifts too much of the burden to residential and small commercial customers. Continuing this practice is unfair because the unprecedented increase in peak demand projected by Dominion is almost entirely due to high-load factor data center customers – not small energy users.
3. **Consumer Protections:** PEC also urges the SCC to adopt more stringent consumer protections than suggested by Dominion, including requiring data centers to make minimum financial commitments and agree to longer contract terms before receiving electric service. This is critical to protect all ratepayers from the risk of being left paying for transmission and power generation infrastructure if the data center growth doesn't build out as expected.

"It is not clear what the next 10 years will bring. What we do know is that there will be capital expenses and other unknown factors that should be factored into the rate structure. The SCC has the obligation to create a system that protects residential and small business ratepayers and does not subsidize global companies. Virginia citizens and businesses are depending on the SCC to do the right thing," said Miller.

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U.S. DEPARTMENT
of ENERGY



Resource Adequacy Report

Evaluating the Reliability and Security of the United States Electric Grid

July 2025

Acknowledgments

This report and associated analysis were prepared for DOE purposes to evaluate both the current state of resource adequacy as well as future pressures resulting from the combination of announced retirements and large load growth.

It was developed in collaboration with and with assistance from the Pacific Northwest National Laboratory (PNNL) and National Renewable Energy Laboratory (NREL). We thank the North American Electric Reliability Corporation (NERC) for providing data used in this study, the Telos Corporation for their assistance in interpreting this data, and the U.S. Energy Information Administration (EIA) for their dissemination of historical datasets. In addition, thank you to NREL for providing synthetic weather data created by Evolved Energy Research for the Regional Energy Deployment System (ReEDS) model.

DOE acknowledges that the resource adequacy analysis that was performed in support of this study could benefit greatly from the in-depth engineering assessments which occur at the regional and utility level. The DOE study team built the methodology and analysis upon the best data that was available. However, entities responsible for the maintenance and operation of the grid have access to a range of data and insights that could further enhance the robustness of reliability decisions, including resource adequacy, operational reliability, and resilience.

Historically, the nation's power system planners would have shared electric reliability information with DOE through mechanisms such as EIA-411, which has been discontinued. Thus, one of the key takeaways from this study process is the underscored "call to action" for strengthened regional engagement, collaboration, and robust data exchange which are critical to addressing the urgency of reliability and security concerns that underpin our collective economic and national security.

Table of Contents

Acknowledgments.....	i
Background to this Report.....	vi
Executive Summary	1
1 Modeling Methodology	10
1.1 Modeling Resource Adequacy.....	13
1.2 Planning Years and Weather Years	15
1.3 Load Modeling.....	15
1.4 Transfer Capabilities and Import Export Modeling	18
1.5 Perfect Capacity Additions	19
2 Regional Analysis.....	20
2.1 MISO.....	20
2.2 ISO-NE.....	23
2.3 NYISO.....	25
2.4 PJM.....	27
2.5 SERC.....	30
2.6	
SPP.....	Error!
Bookmark not defined.	
2.7 CAISO+.....	35
2.8 West Non-CAISO.....	37
2.9 ERCOT.....	40
Appendix A - Generation Calibration and Forecast	A-1
Appendix B - Representing Canadian Transfer Limits	B-1
References	C-1
EO 14262.....	C-3

List of Figures

Figure 1. Mean Annual LOLH by Region (2030) – Plant Closures	6
Figure 2. Mean Annual LOLH by Region (2030) – No Plant Closures	6
Figure 3. Mean Annual NUSE by Region (2030) -Plant Closures	8
Figure 4. Tuned Perfect Capacity (MW) By Region	9
Figure 5. TPRs used in NERC ITCS	10
Figure 6. Simplified Overview of Model.....	14
Figure 7. 2024 to 2030 Projected Data Center Load Additions	16
Figure 8. New Data Center Build (% Split by ISO/RTO) (2030 Estimated).....	17
Figure 9. Mean Peak Load by RTO (Current Case vs 2030 Case)	18
Figure 10. MISO Max Daily Load in the Current System versus 2030	21
Figure 11. MISO Generation Capacity by Technology and Scenario	21
Figure 12. ISO-NE Max Daily Load in the Current System versus 2030	23
Figure 13. ISO-NE Generation Capacity by Technology and Scenario	24
Figure 14. NYISO Max Daily Load in the Current System versus 2030	25
Figure 15. NYISO Generation Capacity by Technology and Scenario	26
Figure 16. PJM Max Daily Load in the Current System versus 2030	28
Figure 17. PJM Generation Capacity by Technology and Scenario	28
Figure 18. SERC Max Daily Load in the Current System versus 2030.....	30
Figure 19. SERC Generation Capacity by Technology and Scenario	31
Figure 20. SPP Max Daily Load in the Current System versus 2030	33
Figure 21. SPP Generation Capacity by Technology and Scenario	33
Figure 22. CAISO+ Max Daily Load in the Current System versus 2030	35
Figure 23. CAISO+ Generation Capacity by Technology and Scenario	36
Figure 24. West Non-CAISO Max Daily Load in the Current System versus 2030	38
Figure 25. West Non-CAISO Generation Capacity by Technology and Scenario	38
Figure 26. ERCOT Max Daily Load in the Current System versus 2030	41
Figure 27. ERCOT Generation Capacity by Technology and Scenario.....	41

List of Tables

Table 1. Summary Metrics Across Cases	7
Table 2. Summary of MISO Reliability Metrics	20
Table 3. Nameplate Capacity by MISO Subregion and Technology (MW).....	22
Table 4. Summary of ISO-NE Reliability Metrics	23
Table 5. Nameplate Capacity by ISO-NE Subregion and Technology (MW).....	24
Table 6. Summary of NYISO Reliability Metrics	25
Table 7. Nameplate Capacity by NYISO Subregion and Technology (MW).....	26
Table 8. Summary of PJM Reliability Metrics	27
Table 9. Nameplate Capacity by PJM Subregion and Technology (MW).....	29
Table 10. Summary of SERC Reliability Metrics	30
Table 11. Nameplate Capacity by SERC Subregion and Technology (MW).....	31
Table 12. Summary of SPP Reliability Metrics	32
Table 13. Nameplate Capacity by SPP Subregion and Technology (MW).....	34
Table 14. Summary of CAISO+ Reliability Metrics	35
Table 15. Nameplate Capacity by CAISO+ Subregion and Technology (MW).....	36
Table 16. Summary of West Non-CAISO Reliability Metrics	37
Table 17. Nameplate Capacity by West Non-CAISO Subregion and Technology (MW).....	39
Table 18. Summary of ERCOT Reliability Metrics.....	40
Table 19. Nameplate Capacity for ERCOT and by Technology (MW)	42

Additional figures and tables in appendices

List of Acronyms

AI	Artificial Intelligence
CAISO	California Independent System Operator
DOE	U.S. Department of Energy
EIA	Energy Information Administration
EO	Executive Order
EPRI	Electric Power Research Institute
ERCOT	Electric Reliability Council of Texas
EUE	Expected Unserved Energy
FERC	Federal Energy Regulatory Commission
GADS	Generating Availability Data System
ISO	Independent System Operator
ISO-NE	ISO New England Inc.
ITCS	Interregional Transfer Capability Study
LBNL	Lawrence Berkeley National Laboratory
LOLE	Loss of Load Expectation
LOLH	Loss of Load Hours
LTRA	Long-Term Reliability Assessment
MISO	Midcontinent Independent System Operator
NERC	North American Electric Reliability Corporation
NREL	National Renewable Energy Laboratory
NYISO	New York Independent System Operator
PJM	PJM Interconnection, LLC
PNNL	Pacific Northwest National Laboratory
ReEDS	Regional Energy Deployment System
RTO	Regional Transmission Organization
SERC	SERC Reliability Corporation
TPR	Transmission Planning Region
USE	Unserved Energy

Background to this Report

On April 8, 2025, President Trump issued Executive Order 14262, "Strengthening the Reliability and Security of the United States Electric Grid." EO 14262 builds on EO 14156, "Declaring a National Emergency (Jan. 20, 2025)," which declared that the previous administration had driven the Nation into a national energy emergency where a precariously inadequate and intermittent energy supply and increasingly unreliable grid require swift action. The United States' ability to remain at the forefront of technological innovation depends on a reliable supply of energy and the integrity of our Nation's electrical grid.

EO 14262 mandates the development of a uniform methodology for analyzing current and anticipated reserve margins across regions of the bulk power system regulated by the Federal Energy Regulatory Commission (FERC). Among other things, EO 14262 requires that such methodology accredit generation resources based on the historical performance of each generation resource type. This report serves as DOE's response to Section 3(b) of EO 14262 by delivering the required uniform methodology to identify at-risk region(s) and guide reliability interventions. The methodology described herein and any analysis it produces will be assessed on a regular basis to ensure its usefulness for effective action among industry and government decision-makers across the United States.

Executive Summary

Our Nation possesses abundant energy resources and capabilities such as oil and gas, coal, and nuclear. The current administration has made great strides—such as deregulation, permitting reform, and other measures—to enable addition of more energy infrastructure crucial to the utilization of these resources. However, even with these foundational strengths, the accelerated retirement of existing generation capacity and the insufficient pace of firm, dispatchable generation additions (partly due to a recent focus on intermittent rather than dispatchable sources of energy) undermine this 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. A failure to power the data centers needed to win the AI arms race or to build the grid infrastructure that ensures our energy independence could result in adversary nations shaping digital norms and controlling digital infrastructure, thereby jeopardizing U.S. economic and national security.

Despite current advancements in the U.S. energy mix, this analysis underscores the urgent necessity of robust and rapid reforms. Such reforms are crucial to powering enough data centers while safeguarding grid reliability and a low cost of living for all Americans.

Key Takeaways

- **Status Quo is Unsustainable.** The status quo of more generation retirements and less dependable replacement generation is neither consistent with winning the AI race and ensuring affordable energy for all Americans, nor with continued grid reliability (ensuring "resource adequacy"). Absent intervention, it is impossible for the nation's bulk power system to meet the AI growth requirements while maintaining a reliable power grid and keeping energy costs low for our citizens.
- **Grid Growth Must Match Pace of AI Innovation.** The magnitude and speed of projected load growth cannot be met with existing approaches to load addition and grid management. The situation necessitates a radical change to unleash the transformative potential of innovation.
- **Retirements Plus Load Growth Increase Risk of Power Outages by 100x in 2030.** The retirement of firm power capacity is exacerbating the resource adequacy problem. 104 GW of firm capacity are set for retirement by 2030. This capacity is not being replaced on a one-to-one basis and losing this generation could lead to significant outages when weather conditions do not accommodate wind and solar generation. In the "plant closures" scenario of this analysis, annual loss of load hours (LOLH) increased by a factor of a hundred.
- **Planned Supply Falls Short, Reliability is at Risk.** The 104 GW of retirements are projected to be replaced by 209 GW of new generation by 2030; however, only 22 GW would come from firm baseload generation sources. Even assuming no retirements, the model found increased risk of outages in 2030 by a factor of 34.

- **Old Tools Won't Solve New Problems.** Antiquated approaches to evaluating resource adequacy do not sufficiently account for the realities of planning and operating modern power grids. At a minimum, modern methods of evaluating resource adequacy need to incorporate frequency, magnitude, and duration of power outages; move beyond exclusively analyzing peak load time periods; and develop integrated models to enable proper analysis of increasing reliance on neighboring grids.

This report clearly demonstrates the need for rapid and robust reform to address resource adequacy issues across the Nation. Inadequate resource adequacy will hinder the development of new manufacturing in America, slow the re-industrialization of the U.S. economy, drive up the cost of living for all Americans, and eliminate the potential to sustain enough data centers to win the AI arms race.

Developing a Uniform Methodology

DOE's resource adequacy methodology assesses the U.S. electric grid's ability to meet future demand through 2030. It provides a forward-looking snapshot of resource adequacy that is tied to electricity supply and new load growth, systematically exploring a range of dimensions that can be compared across regions. As detailed in the methodology section of this report, the model is derived from the North American Electric Reliability Corporation (NERC) Interregional Transfer Capability Study (ITCS) which leverages time-correlated generation and outages based on actual historic data.¹ A deterministic approach² simulates system stress in all hours of the year and incorporates varied grid conditions and operating scenarios based on historical events:

- **Demand for Electricity – Assumed Load Growth:** The methodology accounts for the significant impact of data centers, particularly those supporting AI workloads, on electricity demand. Various organizations' projections for incremental data center electricity use by 2030 range widely (35 GW to 108 GW). DOE adopted a national midpoint assumption of 50 GW by 2030, aligning with central projections from Electric Power Research Institute (EPRI)³ and Lawrence Berkeley National Laboratory (LBNL).⁴ This 50 GW was allocated regionally using state-level growth ratios from S&P's forecast,⁵ reflecting infrastructure characteristics, siting trends, and market activity; and, mapped to NERC Transmission Planning Regions (TPRs).

1. This model differs from traditional peak hour reliability assessments in that it explicitly simulates grid performance hour-by-hour across multiple weather years with finer geographic detail and optimized inter-regional transfers, and explores various retirement and build-out scenarios. Furthermore, the DOE approach integrates weather-synchronized outage data.

2. Deterministic approaches evaluate resource adequacy using relatively stable or fixed assumptions about the representation of the power system. Probabilistic approaches incorporate data and advanced modeling techniques to represent uncertainty that require more computing power. Deterministic was chosen for this analysis for transparency and to model detailed historic system conditions.

3. EPRI, "Powering Intelligence: Analyzing Artificial Intelligence and Data Center Energy Consumption," March 2024, <https://www.epri.com/research/products/3002028905>.

4. Shehabi, A., et al., "2024 United States Data Center Energy Usage Report," <https://escholarship.org/uc/item/32d6m0d1>.

5. S&P Global – Market Intelligence, "US Datacenters and Energy Report," 2024.

An additional 51 GW of non-data center load was modeled using NERC data, historical loads (2019-2023), and simulated weather years (2007-2013), adjusted by the Energy Information Administration's (EIA) 2022 energy forecast, with interpolation between 2024 and 2033 to estimate 2030 demand.

- **Supply of Electricity – Assumed Generation Retirements and Additions:** Between the current system and the projected 2030 system, the model considers three scenarios for generator retirements and additions. These scenarios were selected to describe the metrics of interest and how they change during certain assumptions of generation growth and retirements.

The resource adequacy standard (or criterion) is the measure that defines the desired level of adequacy needed for a given system. Conceptually, a resource adequacy criterion has two components—metrics and target levels—that determine whether a system is considered adequate. Comprehensive resource adequacy metrics⁶ are incorporated in this analysis to capture the magnitude and duration of system stress events:

- **Magnitude of Outages – Normalized Unserved Energy (NUSE):** Measures the amount of unmet electrical energy demand because of insufficient generation or transmission, typically measured in megawatt hours (MWh).

While USE describes the absolute amount of energy not delivered, it is less useful when comparing systems of different size or across different periods. Normalizing, by dividing by total load over a whole period (for example, a year) allows comparison of these metrics across different system sizes, demand levels, and periods of analysis. For example, 100 MWh of USE in a small, isolated microgrid can be more impactful than 100 MWh of USE in a larger regional grid that serves millions of people. USE is normalized by dividing by total load:

$$\frac{100 \text{ MWh (of unserved energy)}}{10,000,000 \text{ MWh (of total energy delivered in a year)}} \times 100 = 0.001 \text{ percent}$$

Although the use of NUSE is not standardized in the U.S. today,⁷ several system operators domestically and across the world have begun using NUSE as a useful metric.

- **Duration of Outages – Loss of Load Hours (LOLH):** Measures the expected duration of power outages when a system's load exceeds its available generation capacity. At the core, LOLH helps assess how frequently and for how long the power system is likely to experience insufficient supply, providing a picture of reliability in terms of time. LOLH is calculated as both a total and average value per year, in addition to the maximum percentage of load lost in any given hour per year.

6. In the interest of technical accuracy, and separate from their contextualization in the main text, NUSE is more precisely a measure of volume that is expressed as a percentage. Similarly, 2.4 hours of LOLH represents the cumulative sum of distinct periods of load loss, not a singular, continuous duration.

7. There is no common planning criterion for this metric in North America. NERC's Long-Term Reliability Assessment employs a normalized expected unserved energy (NEUE) metric to define target risk levels for each region. Grid operators, such as ISO-NE, have also considered NUSE in energy adequacy studies. For example, see ISO-NE, "Regional Energy Shortfall Threshold (REST): ISO's Current Thinking Regarding Tail Selection," April 2025, https://www.iso-ne.com/static-assets/documents/100022/a09_rest_april_2025.pdf.

Reliability Standard

DOE's methodology recognizes that the traditional 1-in-10 loss of load expectation (LOLE) criterion is insufficient for a complete assessment of resource adequacy and risk profile. This antiquated criterion is not calculated uniformly and fails to adequately account for crucial factors such as the duration and magnitude of potential outages.⁸ To provide a comprehensive understanding of system reliability and, specifically, to complement current resource adequacy standards while informing the creation of new criteria, the methodology uses the following reliability standard:

- **Duration of Outages:** No more than 2.4 hours of lost load in an individual year.⁹ This translates into one day of lost load in ten years to meet the 1-in-10 criteria.
- **Magnitude of Outages:** No more than an NUSE of 0.002%.¹⁰ This means that the total amount of energy that cannot be supplied to customers is 0.002% of the total energy demanded in a given year.

Achieving Reliability Standard

- **Perfect Capacity Surplus/Deficit:** Defined as the amount of generation capacity (in MW) a region would need to achieve specified threshold conditions. Based on these thresholds, this standard helps answer the hypothetical question of how much more (or less) power plant capacity is needed for a power system to be considered "perfectly reliable" according to pre-defined standards. This methodology employs this perfect capacity metric to identify the amount of capacity needed to remedy potential shortfalls (or excesses) in generation.

Key Results Summary

This analysis developed three separate cases for 2030. The **"Plant Closures"** case assumes all announced retirements occur plus mature generation additions based on NERC's Tier 1 resources category,¹¹ which encompasses completed and under-construction power generation projects, as well as those with firm-signed and approved interconnection service or power purchase agreements. The **"No Plant Closures"** case assumes no retirements plus mature additions. A **"Required Build"** case further compares the impacts of retirements on perfect capacity additions needed to return 2030 to the current system level of reliability.

8. While 1-in-10 analyses have evolved, industry experts have raised concerns about its effectiveness to address future system risks. Concerns include energy constraints that arise from intermittent resources, increasing battery storage, limited fuel supplies, and the shifting away of peak load periods from times of supply shortfalls.

9. The "1-in-10 year" reliability standard for electricity grids means that, on average, there should be no more than one day (24 hours) of lost load over a ten-year period. This translates to a maximum of 2.4 hours of lost load per year.

10. This analysis targets NUSE below 0.002% for each region because this is the target NERC uses to represent high risk in resource adequacy analyses. Estimates used in industry and analyzed recently range from 0.0001% to 0.003%.

10. Mature generation additions are based on NERC's 2024 LTRA Tier 1 resources, which assume that only projects considered very mature in the development pipeline will be built. For example, Tier 1 additions are those with signed interconnection agreements or power purchase agreements, or included in an integrated resource plan, indicating a high degree of certainty in their addition to the grid. Full details of the retirement and addition assumptions can be found in the methodology section of this report.

DOE ran simulations using 12 different years of historical weather. Every hour was based on actual data for wind, solar, load, and thermal availability to stress test the grid under a range of realistic weather conditions. The benefit of this approach is that it allows for transparent review of how actual conditions manifest themselves in capacity shortfalls. For all scenarios, LOLH and NUSE are calculated and used to compare how they change based on generation growth, retirements, and potential weather conditions.

- **Current System:** Supply of power (generation) and demand for power (load) consistent with 2024 NERC Long-Term Reliability Assessment (LTRA), including 2023 actual generation plus Tier 1 additions for 2024.
- **Plant Closures:** This case assumes 104 GW of announced retirements based on NERC estimates including approximately 71 GW of coal and 25 GW of natural gas, which closely align with retirement numbers in EIA's 2025 Annual Energy Outlook. In addition, this case assumes 100% of 2024 NERC LTRA Tier 1 additions totaling 209 GW are constructed by 2030. This includes 20 GW of new natural gas, 31 GW of additional 4-hour batteries, 124 GW of new solar and 32 GW of incremental wind. Details of the breakdown can be found in Appendix A.
- **No Plant Closures:** This case adds all the Tier 1 NERC additions but assumes no retirements.
- **Required Build:** To understand how much capacity may need to be added to reach reliability targets, the analysis adds hypothetical perfect capacity (which is idealized capacity that has no outages or profile) until a NUSE target of 0.002% is realized in each region. This scenario includes the same assumptions about retirements as our Plant Closures scenario described above.

As shown in the figures and tables below, the model shows a significant decline in all reliability metrics between the current system scenario and the 2030 Plant Closures scenario. Most notably, there is a hundredfold increase in annual LOLH from 8.1 hours per year in the current case to 817 hours per year in the 2030 Plant Closures. In the worst weather year assessed, the total lost load hours increase from 50 hours to 1,316 hours.

Report on Evaluating U.S. Grid Reliability and Security

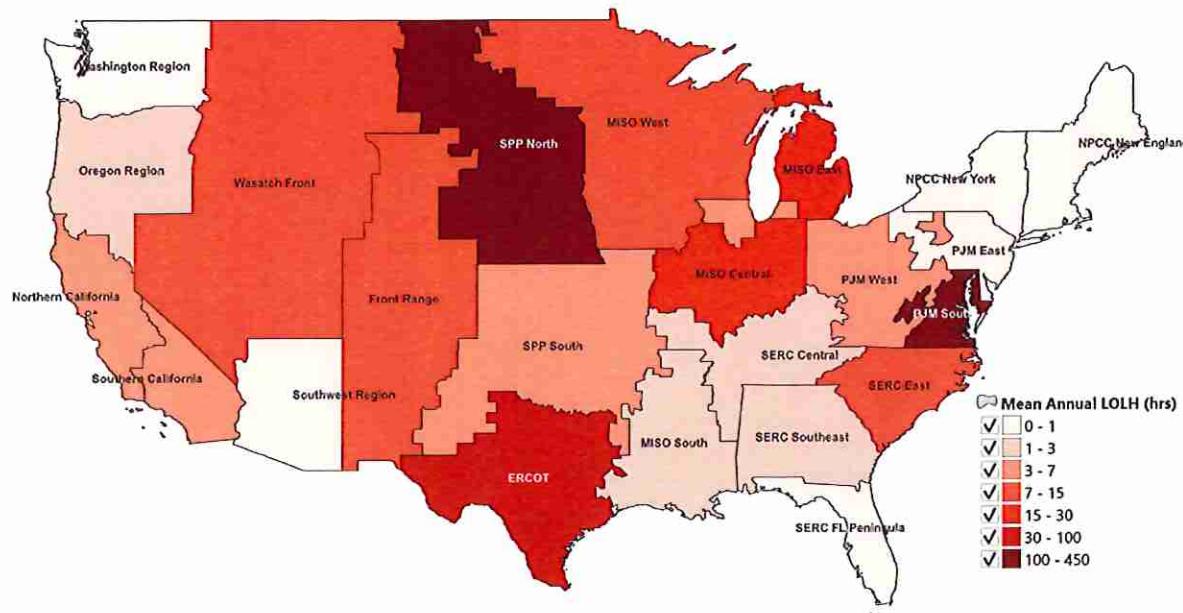


Figure 1. Mean Annual LOLH by Region (2030) – Plant Closures

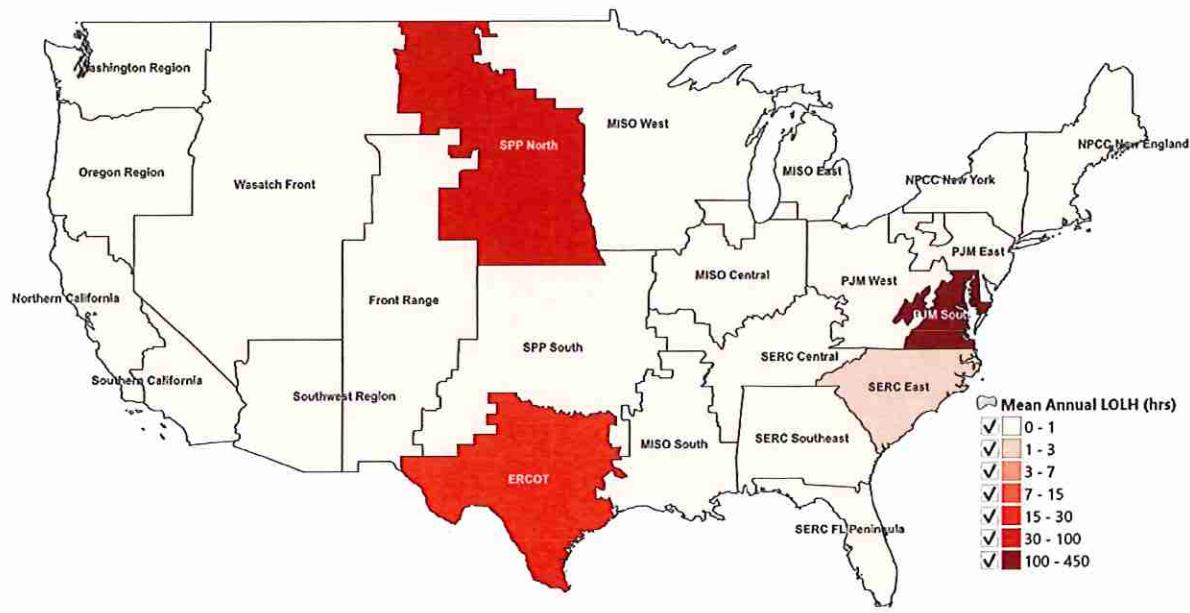


Figure 2. Mean Annual LOLH by Region (2030) – No Plant Closures

Table 1. Summary Metrics Across Cases

Reliability Metric	2030 Projection			
	Current System	Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	8.1	817.7	269.9	13.3
Normalized Unserved Energy (%)	0.0005	0.0465	0.0164	0.00048
WORST WEATHER YEAR				
Annual Loss of Load Hours	50	1316	658	53
Normalized Unserved Load (%)	0.0033	0.1119	0.0552	0.002

Current System Analysis

Analysis of the current system shows all regions except ERCOT have less than 2.4 hours of average loss of load per year and less than 0.002% NUSE. This indicates relative reliability for most regions based on the average indicators of risk used in this study. In the current system case, ERCOT would be expected to experience on average 3.8 LOLH annually going forward and a NUSE of 0.0032%. When looking at metrics in the worst weather years, regions meet or exceed additional criteria. All regions experienced less than 20% of lost load in any hour.

However, PJM, ERCOT,¹² and SPP experienced significant loss of load events during 2021 and 2022 winter storms Uri and Elliot which translated into more than 20 hours of lost load. This results in a concentration of lost load within certain years such that some regions exceeded 3-hours-per-year of lost load. It is worth noting that in the case of PJM and SPP, the current system model shortfalls occurred within subregions rather than for the entire ISO footprint.

12. ERCOT has since winterized its generation fleet and did not suffer any outages during Winter Storm Elliot.

2030 Model Results

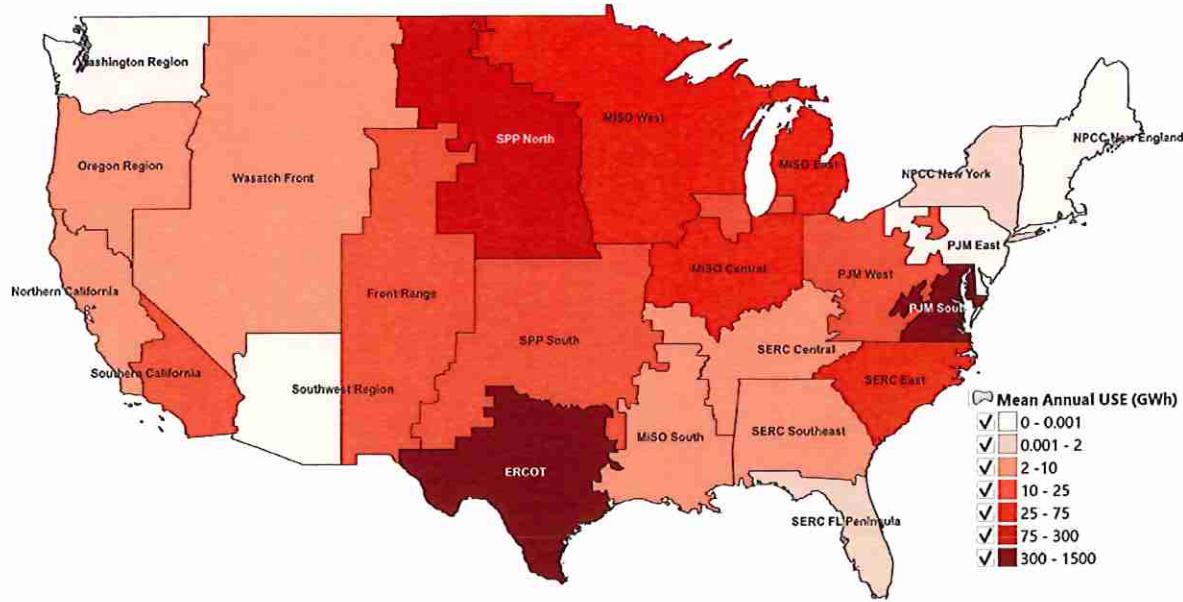


Figure 3. Mean Annual NUSE by Region (2030) -Plant Closures

Key Findings – Plant Closures Case:

- **Systemwide Failures:** All regions except ISO-NE and NYISO failed reliability thresholds. These two regions did not have additional AI/data center (AI/DC) load growth modeled.
- **Loss of Load Hours (LOLH):** Ranged from 7 hours/year in CAISO to 430 hours/year in PJM.
- **Load Shortfall Severity:** Max shortfall reached as high as 43% of hourly load in PJM; 31% in CAISO.
- **Normalized Unserved Energy:** Normalized values ranged from 0.0032% (non-CAISO West) to 0.1473% (PJM), far exceeding thresholds of 0.002%.
- **Extreme Events:** Most regions experienced ≥ 3 hours of unserved load in at least one year. PJM had 1,052 hours in its worst year.
- **Spatial Takeaways:** Subregions in PJM, MISO, and SERC met thresholds—indicating possible benefits from transmission—but SPP and CAISO failed in all subregions.

Key Findings – No Plant Closures Case:

- **Improved System Performance:** Most regions avoided loss of load events. PJM, SPP, and SERC still experienced shortfalls.
- **Regional Failures:**

- o **PJM:** 214 hours/year average, 0.066% normalized unserved energy, 644 hours in worst year, max 36% of load lost.
- o **SPP:** 48 hours/year average, 0.008% normalized unserved energy, max 19% load lost.
- o **ERCOT:** 20 average hours, 0.028% normalized unserved energy, 101 max hours/year, peak shortfall of 27%.
- o **SERC-East:** Generally adequate (avg. 1 hour/year, 0.0003% NUSE), but Elliot storm in 2022 caused 42 hours of shortfall.

The overall takeaway is that avoiding announced retirements improves grid reliability, but shortfalls persist in PJM, SPP, ERCOT, and SERC, particularly in winter.

Required Build

This required build analysis quantifies "hypothetical capacity," defined as power that is 100% reliable and available that is needed to resolve the shortfalls. Known in industry as "perfect capacity," this metric is utilized to avoid the complex decision of selecting specific generation technologies, as that is ultimately an optimization of reliability against cost considerations. Nevertheless, it serves as a valuable indicator, illustrating either the magnitude of a resource gap or the scale of large load that will be unable to interconnect. For the Required Build case, this hypothetical capacity was calculated by adding new generating resources to each region until a target of 0.002% of NUSE is reached.

The table below shows the tuned perfect capacity results. For the current system, this analysis identifies an additional 2.4 MW of capacity to meet the NUSE target for PJM, which experiences shortfalls due to the winter storm Elliot historical weather year. By 2030, without considering any generation retirements, an additional 12.5 GW of generating capacity is needed across PJM, SPP, and SERC to reduce shortfalls.

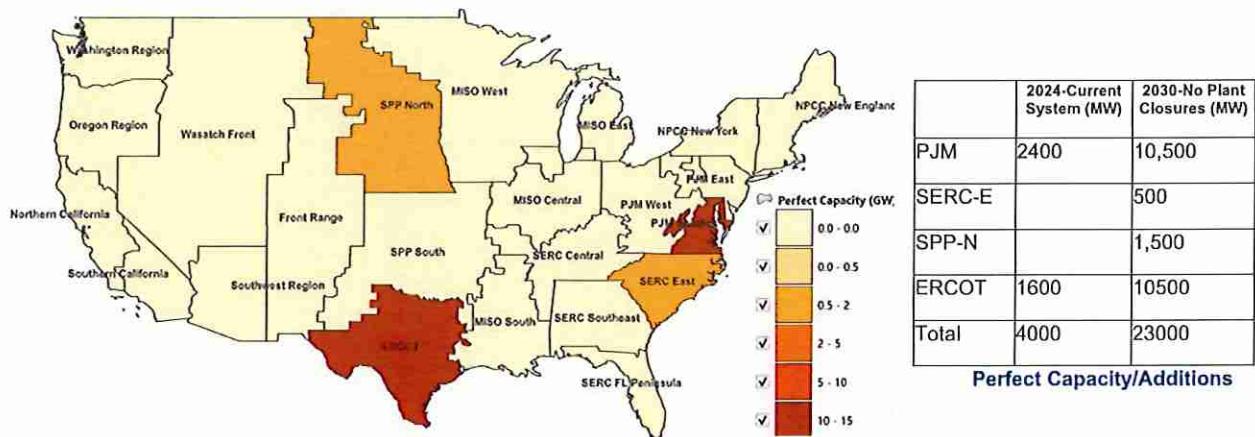


Figure 4. Tuned Perfect Capacity (MW) By Region

1 Modeling Methodology

The methodology uses a zonal PLEXOS¹³ model with hourly time-synchronous datasets for load, generation, and interregional transfer for the 23 U.S. subregions (referred to as TPRs in this study)¹⁴ including ERCOT (see Figure 5 below). While ERCOT operates outside of FERC's general jurisdiction,¹⁵ it provides a valuable case for understanding broader reliability and resource adequacy challenges in the U.S. electric grid, and FPA Section 202(c) allows DOE to issue emergency orders to ERCOT.

We base this analysis on actual weather and power plant outage data from 2007 to 2023 using NERC's ITCS¹⁶ base dataset. DOE specifically decided to start this analysis with the ITCS dataset since it is a complete representation of the interconnected electrical system for the lower 48 and it has been thoroughly reviewed by industry experts in a public and transparent process. DOE has in turn made modifications to the dataset to fit the needs of this study. The contents of this section focus on those modifications which DOE implemented for purposes of this study.

PLEXOS is an industry-trusted simulation tool used for energy optimization, resource adequacy, and production cost modeling. This study leverages PLEXOS' ability to exercise an hourly production cost model to determine the balance between loads, generation, and imports for each region. Modeling was carried out using a deterministic approach that evaluates whether a power system has sufficient resources to meet projected demand under a pre-defined set of conditions which correspond to the past few years of real-world events. The model ultimately determines the amount of unmet load if generation resources and imports are not sufficient for meeting the load in each discrete time period.

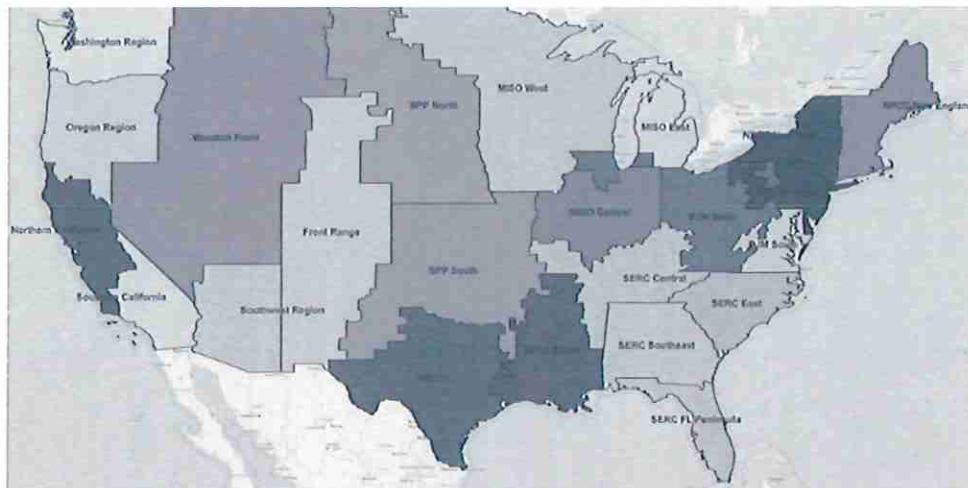


Figure 5. TPRs used in NERC ITCS

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13. Energy Exemplar, "PLEXOS," <https://www.energyexemplar.com/plexos>.
 14. The TPRs match the regional subdivisions in the NERC ITCS study, itself based on FERC's transmission planning regions.
 15. Transmission within ERCOT is intrastate commerce. 16 U.S.C. § 824(b)(1) (provisions applying to "the transmission of electric energy in interstate commerce").
 16. NERC "Integrated Transmission and Capacity System (ITCS)," accessed June 25, 2025, <https://www.nerc.com/pa/RAPA/Pages/ITCS.aspx>.

This methodology developed a current model and series of scenarios to explore how different assumptions impact resource adequacy. This sensitivity analysis includes assumptions regarding load growth, generation build-outs and retirements, and transfer capabilities. By comparing the results of the current model with the scenario results, we can assess how generation retirements and load growth affect future generation needs.

The assessment uses data from 2007–2013 (synthetic weather data) and 2019–2023 (historical data). A brief summary of the methodological assumptions is provided here, with additional details available in the relevant appendixes.

- **Solar and Wind Availability** – Created from historical output from EIA 930 data, with bias correction of any nonhistorical data to match regional capacity factors, as calibrated to EIA 930 data.¹⁷ Synthetic years used 2018 technology characteristics from NREL based on the Variable Energy Potential (reV) model, then mapped to synthetic weather year data. See Appendix A for more details.
- **Thermal Availability** – Calculated according to NERC LTRA capacity data, adjusted for historical outages and derates, primarily with GADS data. GADS data does not capture historical outages caused by fuel supply interruptions.¹⁸
- **Hydroelectric Availability** – Historical outputs are processed by NERC to establish monthly power rating limits and energy budgets, but energy budgets are not enforced in alignment with how they were treated in the ITCS. The team evaluated performance under different energy budget restrictions, but did not find significant differences during peak hours, justifying NERC ITCS assumptions that hydroelectric resources could generally be dispatched to peak load conditions. Later work may benefit from exploring drought scenarios or combinations of weather and hydrological years, where energy budgets may be significantly decreased.
- **Outages and Derates** – Data for the actual data period (2019–2023) are based on historical forced outage rates and deratings. Outage and deratings data for the synthetic period (2007–2013) are based on the historical relationships observed between temperature and outages (see Appendix G of the NERC ITCS Final Report for more information).
- **Load Projections and AI Growth** – Load growth through 2030 is assumed to match NERC 2024 ITCS projections, scaling the 12 weather years to meet 2030 projections. Additional AI and data center load is then added according to reports from EPRI and S&P regarding potential futures.
- **Transfer Capabilities and Imports/Exports** - Each subregion is treated as a “copper plate,” with the transfer capacity between each subregion defined by the availability of transmission pathways. It is an approximation that assumes all resources are connected to a single point, simplifying the transmission system within the model. Subregions are generally assumed to exhaust their own capacity before utilizing capacity available from their neighbors. Once the net remaining capacity is at or below 10 percent of load, the subregion begins to use capacity from a neighbor.

17. See ITCS Final Report, Appendix F, for the method that was implemented to scale synthetic weather years 2007–2013.

18. See ITCS Final Report, Appendix G, for outage and derate methods.

- Imports are assumed to be available up to the minimum total transfer capacity and spare generation in the neighboring subregion.
- To the extent the remaining capacity after transmission and demand response falls below the 6 percent or 3 percent needed for error forecasting and ancillary services, depending on the scenario, the model projects an energy shortfall. See "Outputs" in the appendix for more details.
- To ensure that transfers are dispatched only after local resources are exhausted, a wheeling charge of \$1,000 is applied for every megawatt-hour of energy transferred between regions through transmission pathways.
- **Storage** – In alignment with the NERC ITCS methodology, storage was split into pumped hydro and battery storage. Pumped hydro was assumed to have 12 hours duration at rated capacity with 30% round-trip losses, while battery storage was assumed to have four hours and 13% round-trip losses. Storage is dispatched as an optimization to minimize USE and demand response usage under various constraints and is recharged during periods of surplus energy.
- **Demand Response** – Demand Response (DR) is treated as a supply-side resource and dynamically scheduled after all other regional resources and imports are exhausted. It is modeled with both capacity (MW) and energy (MWh) limitations and assumed to have three hours of availability at capacity but could be spread across more than three hours up to the energy limit. DR capacity was based on LTRA Form A data submissions for "Controllable and Dispatchable Demand Response – Available", or firm, controllable DR capacity.
- **Retirements** – Retirements as per the NERC LTRA 2024 model. To disaggregate generation capacity from the NERC assessment areas to the ITCS regions, EIA 860 plant level data are used to tabulate generation retirement or addition capacity for each ITCS region and NERC assessment area. Disaggregation fractions are then calculated by technology based on planned retirements through 2030. See Appendix B for further information. Retirements are categorized into two categories:
 1. *Announced Retirements*: Includes both confirmed retirements and announced retirements. Confirmed retirements are generators formally recognized by system operators as having started the official retirement process and are assumed to retire on their expected date. To go from LTRA regions to ITCS regions, weighting factors are derived in the same way as in the generation set, based on EIA retirement data. In addition to confirmed retirements, announced retirements are generators that have publicly stated retirement plans that have not formally notified system operators and initiated the retirement process. This disaggregation method for announced retirements mirrors used for confirmed retirements.¹⁹
 2. *None*: Removes all retirements (after 2024) for comparison. Delaying or canceling some near-term retirements may not be feasible, but this case can help determine how much retirement contributes to some of the adequacy challenges in some regions.
- **Additions** – Assumes only projects that are very mature in the pipeline (such as those with a signed interconnection agreement) will be built. This data is based on projects

19. If announced retirements were less than or equal to confirmed retirements, the model adjusted the announced retirement to equal confirmed.

designated as Tier 1 in the NERC 2024 LTRA and are mapped to ITCS regions with EIA 860-derived weighting factors similar to those described for the retirements above. See Appendix A for further information.

- **Perfect Capacity Required** - Estimates perfect capacity (which is idealized capacity that has no outages or profile and is described in Section 2) until we reach a pre-defined reliability target. We used a metric of NUSE given the deterministic nature of the model, to be consistent with evolving metrics, and to be consistent with NERC's recent LTRAs. We targeted NUSE of below 0.002% for each region.

1.1 Modeling Resource Adequacy

This model calculates several reliability metrics to assess resource adequacy. These metrics were calculated using PLEXOS simulation outputs, which report the USE (in MWh) for all 8,760 hourly periods in each of the 12 weather years:

- **USE** refers to the amount of electricity demand that could not be met due to insufficient generation and/or transmission capacity. Several USE-derived indicators were considered:
 - *Normalized USE (percentage %)*: The total amount of unserved load over 12 years of weather data, normalized by dividing by total load, and reported as a percentage.²⁰
 - *Mean Annual USE (GWh)*: The 12-year average of each region's total USE in each weather year. This mean value represents the average annual USE across weather variability.
 - *Mean Max Unserved Power (GW)*: The 12-year average of each region's maximum USE value in each weather year. This mean value characterizes the typical non-coincident peak stress on system reliability.
 - *% Max Unserved Power*: The Mean Max Unserved Power expressed as a percentage of the average native load during those peak unserved hours for each region. This percentage value provides a normalized measure of the severity of peak unserved events relative to demand.
 - *Total number of customers without power*: The Mean Max Unserved Power expressed as the equivalent number of typical U.S. persons assuming a ratio of 17,625 persons/MW lost. This estimation contextualizes the effects of the outage on average Americans.
- **Loss of Load Hours (LOLH)** refers to the number of hours during which the system experiences USE (i.e., any hour with non-zero USE). Two LOLH-based indicators were considered:

20. NUSE can be reported as parts per million or as a percentage (or parts per hundred); though for power system reliability, this would include several zeros after the decimal point.

- *Mean Annual LOLH*: for each weather year and *TPR*, we count the total number of hours with *USE* across all 8,760 hours, and we then take the average of those 12 totals. *Annual LOLH Distribution* is represented in box and whisker plots for 12 samples, each sample corresponding to a unique weather year.
- *Max Consecutive LOLH (hours)*²¹: The longest continuous period with reported *USE* in each weather year.

It should be noted that *USE* is not an indication that reliability coordinators would allow this level of load growth to jeopardize the reliability of the system. Rather, it represents the unrealizable AI and data center load growth under the given assumptions for generator build outs by 2030, generator retirements by 2030, reserve requirements, and potential load growth. These numbers are used as indicators to determine where it may be beneficial to encourage increased generation and transmission capacity to meet an expected need.

This study does not employ common probabilistic industry metrics such as *EUE* or *LOLE* due to their reliance on probabilistic modeling. Instead, deterministic equivalents are used.

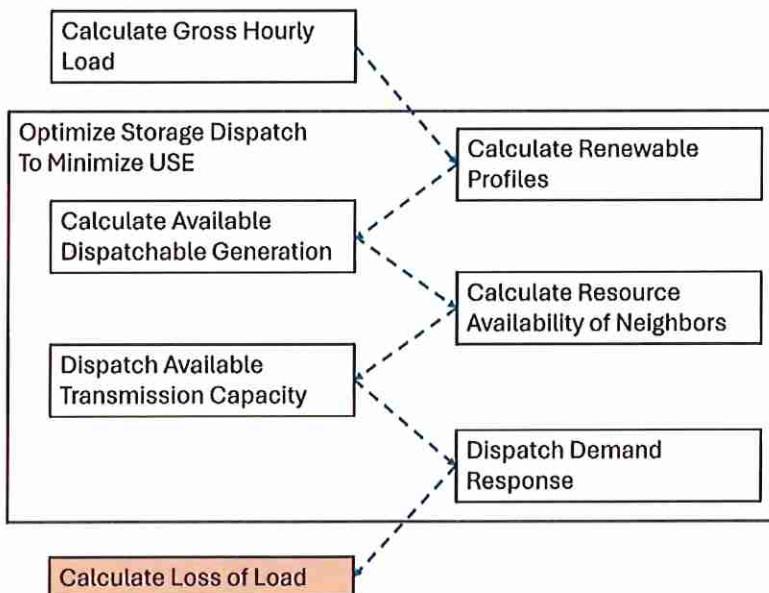


Figure 6. Simplified Overview of Model

21. One caveat on the maximum consecutive LOLH and max USE values is in how storage is dispatched in the model. Storage is dispatched to minimize the overall USE and is indifferent to the peak depth or the duration of the event. This may construe some of the max USE and max consecutive LOLH values to be higher than if storage was dispatched to minimize these values.

1.2 Planning Years and Weather Years

For the planning year (2030), historical weather year data are applied based on conditions between 2007 and 2024 to calculate load, wind and solar generation, and hydro generation. Dispatchable capacity (including dispatchable hydro capacity) is calculated through adjustment of the 2024 LTRA capacity data for historical outages from GADS data. Storage assets are scheduled to arbitrage hourly energy margins or else charge during periods of high energy margins (surplus resources) and discharge during periods of lower energy margins.

1.3 Load Modeling

Data Center Growth

Several utilities and financial and industry analysts identify data centers, particularly those supporting AI workloads, as a key driver of electricity demand growth. Multiple organizations have developed a wide range of projections for U.S. data center electricity use through 2030 and beyond, each using distinct methodologies tailored to their institutional expertise.

These datasets were used to explore reasonable boundaries for what different parts of the economy envision for the future state of AI and data center (AI/DC) load growth. For the purposes of this study, rather than focusing on any specific analysis, a more generic sweep was performed across AI/DC load growth and the various sensitivities that fit within those assumptions, as summarized below:

- McKinsey & Company projects ~10% annual growth in U.S. data center electricity demand, reaching 2,445 TWh by 2050. Their model blends internal scenarios with public signals, including announced projects, capital investment, server shipments, and chip-level power trends, supported by third-party market data.
- Lawrence Berkeley National Laboratory (LBNL) uses a bottom-up approach based on historical and projected IT equipment shipments, paired with assumptions on power draw, utilization, and infrastructure efficiency (PUE, WUE). Their projections through 2028 account for AI hardware adoption, operational shifts, and evolving cooling technologies.
- EPRI combines public data, expert input, and historical trends to define four national growth scenarios, low to higher, for 2023–2030, reflecting data processing demand, efficiency improvements, and AI-driven load impacts.
- S&P Global merges technology and power-sector models, evaluating grid readiness and facility growth under varying demand scenarios. Their forecasts consider AI adoption, efficiency trends, grid and permitting constraints, on-site generation, and offshoring risk, resulting in a wide range of outcomes.

These projections show wide variation, with 2030 electricity demand ranging from approximately 35 GW to 108 GW of average load. Given this uncertainty, including differences in hardware intensity, thermal management, siting assumptions, and behind-the-meter generation, the modeling team adopted a national midpoint assumption of approximately 50 GW by 2030.

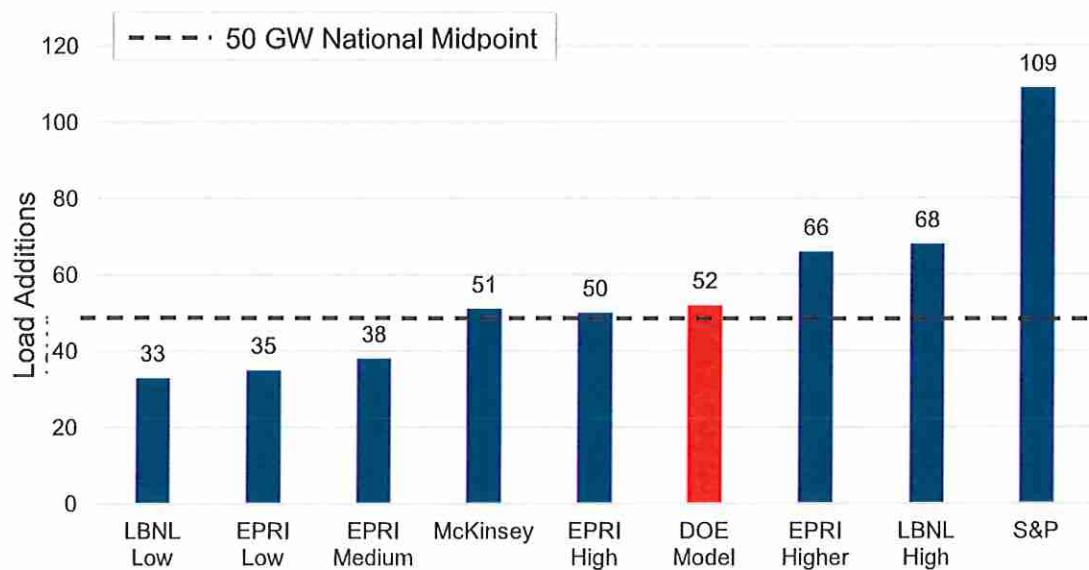


Figure 7. 2024 to 2030 Projected Data Center Load Additions

Figure 2 above displays a benchmark reflecting the median across major studies and aligns with central projections from EPRI and LBNL. Using a single planning midpoint avoids double counting and enables consistent load allocation across national transmission and resource adequacy models.

Data Center Allocation Method

To allocate the 50 GW midpoint regionally, the team used state-level growth ratios from S&P's forecast. These ratios reflect factors such as infrastructure, siting trends, and projected market activity. The modeling team mapped the state-level projections to NERC TPRs, ensuring transparent and repeatable regional allocation. While other methods exist, this approach ensured consistency with the broader modeling framework.

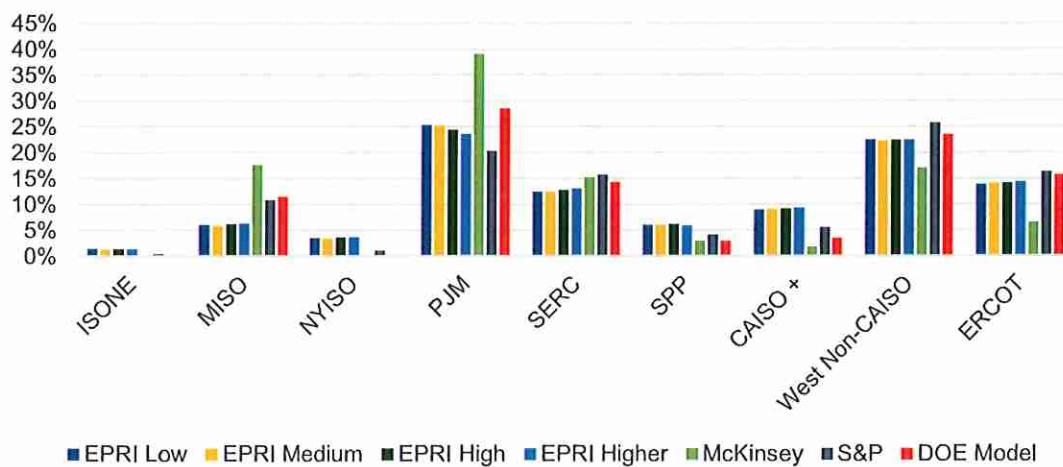


Figure 8. New Data Center Build (% Split by ISO/RTO) (2030 Estimated)

Non-Data Center Load Modeling

The current electricity demand projections were built from NERC data, using historical load (2019–2023) and simulated weather years (2007–2013). These were adjusted based on the EIA's 2022 energy forecast. To estimate 2030 demand, the team interpolated between 2024 and 2033, scaling loads to reflect energy use and seasonal peaks. NERC provided datasets to address anomalies and include behind-the-meter and USE.

Given the rapid emergence of AI/DC loads, additional steps were taken to account for this category of demand. It is difficult to determine how much AI/DC load is already embedded in NERC LTRA forecast, for example, the 2024 LTRA saw more than 50GW increase from 2023, signaling a major shift in utility expectations. To benchmark existing AI/DC contribution, DOE assumed base 2023 AI/DC load equaled the EPRI low-growth case of 166 TWh.

Overall Impact on Projected Peak Load

As a result of the methods applied above, the average year co-incident peak load is projected to grow from a current average peak of 774 GW to 889 GW in 2030. This represents a 15% increase or 2.3% growth rate per year. Excluding the impact of data centers, this would amount to a 51GW increase from 774 GW to 826 GW which represents a 1.1% annual growth rate.

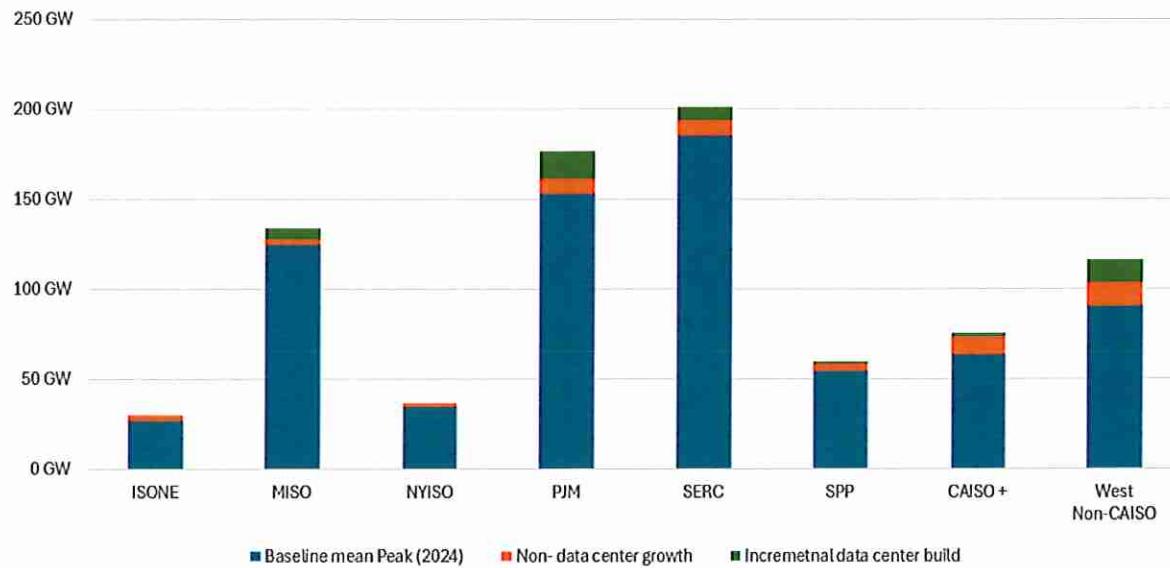


Figure 9. Mean Peak Load by RTO (Current Case vs 2030 Case)

1.4 Transfer Capabilities and Import Export Modeling

The methodology assumes electricity moves between subregions, when conditions start to tighten. Each region has a certain amount of capacity available, and the methodology determines if there is enough to meet the demand. When regions reach a “Tight Margin Level” of 10% of capacity, i.e., if a region’s available capacity is less than 110% of load, it will start transferring from other regions if capacity is available. A scarcity factor is used to determine which regions to transfer from and at what fraction – those with a greater amount of reserve capacity will transfer more. A region is only allowed to export above when it is above the Tight Margin Level.

Total Transfer Capability (TTC) was used and is the sum of the Base Transfer Level and the First Contingency Incremental Transfer Capability. These were derived from scheduled interchange tables or approximated from actual line flows. It should be noted that the TTC does not represent a single line, but rather multiple connections between regions. It is similar to path limits used by many entities but may have different values.

Due to data and privacy limitations, the Canadian power system was not modeled directly as a combination of generation capacity and demand. Instead, actual hourly imports were used from nearly 20 years of historical data, along with recent trends (generally less transfers available during peak hours), to develop daily limits on transfer capabilities. See Appendix B for more details on Canadian transfer limits.

1.5 Perfect Capacity Additions

To understand how much capacity may need to be added to reach approximate reliability targets, we tuned two scenarios by adding hypothetical perfect capacity to reach the reliability threshold based on NUSE.²² Today, NERC uses a threshold of 0.002% to indicate regions are at high risk of resource adequacy shortfalls. In addition, several system operators, including the Australia Energy Market Operator and Alberta Electric System Operator, are using NUSE thresholds in the range of 0.001% to 0.003%. Several U.S. entities are considering lower thresholds for U.S. power systems in the range of 0.0001% to 0.0002%.²³

For this analysis, we target NUSE below 0.002% for each region to align with NERC definitions. We iteratively ran the model, hand-tuning the “perfect capacity” to be as small as possible while reaching NUSE values below 0.002% in all regions.²⁴ As the work was done by hand with a limited number of iterations (15), this should not be considered the minimum possible capacity to accomplish these targets. Further, because the perfect capacity can be located in various places, there would be multiple potential solutions to the problem. These scenarios represent the approximate quantity of perfect capacity each region would require (beyond announced retirements and mature generation additions only) that would lead to Medium or Low risk based on the NERC metrics for USE.

Due to some regions with zero USE, the tuned cases do not reach the same level of adequacy, where the national average is 0.00045% vs. 0.00013%. Due to transmission and siting selection of perfect capacity, there could be many solutions.

22. We are not using the standard term “expected unserved energy” because we are not running a probabilistic model, so we do not have the full understanding of long-term expectations

23. MISO, “Resource Adequacy Metrics and Criteria Roadmap,” December 2024.
<https://cdn.misoenergy.org/Resource%20Adequacy%20Metrics%20and%20Criteria%20Roadmap667168.pdf>.

24. NERC, “Evolving Criteria for a Sustainable Power Grid,” July 2024.
https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/Evolving_Planning_Criteria_for_a_Sustainable_Power_Grid.pdf.

2 Regional Analysis

This section presents more regional details on resource adequacy according to this analysis. For each of the nine Regional Transmission Organizations (RTOs) and sub-regions, comprehensive summaries are provided of reliability metrics, load assumptions, and composition of generation stacks.

2.1 MISO²⁵

In the current system model and the No Plant Closures cases, MISO did not experience shortfall events. MISO's minimum spare capacity in the tightest year was negative, showing that adequacy was achieved by importing power from neighbors. In the Plant Closures case, MISO experienced significant shortfalls, with key reliability metrics exceeding each of the threshold criteria defined for the study.

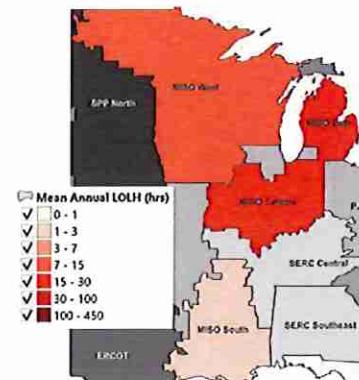


Table 2. Summary of MISO Reliability Metrics

Reliability Metric	Current System	2030 Projection		
		Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	-	37.8	-	-
Normalized Unserved Energy (%)	-	0.0211	-	-
Unserved Load (MWh)	-	157,599	-	-
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	-	124	-	-
Normalized Unserved Load (%)	-	0.0702	-	-
Unserved Load (MWh)	-	524,180	-	-

Load Assumptions

MISO's peak load was roughly 130 GW in the current model and projected to increase to roughly 140 GW by 2030. Approximately 6 GW of this relates to new data centers being installed (12% of U.S. total).

25. Following the initial data collection for this report, MISO issued its 2025 Summer Reliability Assessment. Based on that report, NERC revised evaluations from its 2024 LTRA and reclassified the MISO footprint from being an 'elevated risk' to 'high risk' in the 2028–2031 timeframe, depending on new resource additions/retirements. While DOE's analysis is based on the previously reported figures, DOE is committed to assessing the implications of updated data on overall resource adequacy and providing technical updates on findings, as appropriate.



Figure 10. MISO Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was approximately 207 GW.²⁶ In 2030, 21 GW of new capacity was added leading to 228 GW of capacity in the No Plant Closures case. In the Plant Closures case, 32 GW of capacity was retired such that net retirements in the Plant Closures case were -11 GW, or 196 GW of overall installed capacity on the system.

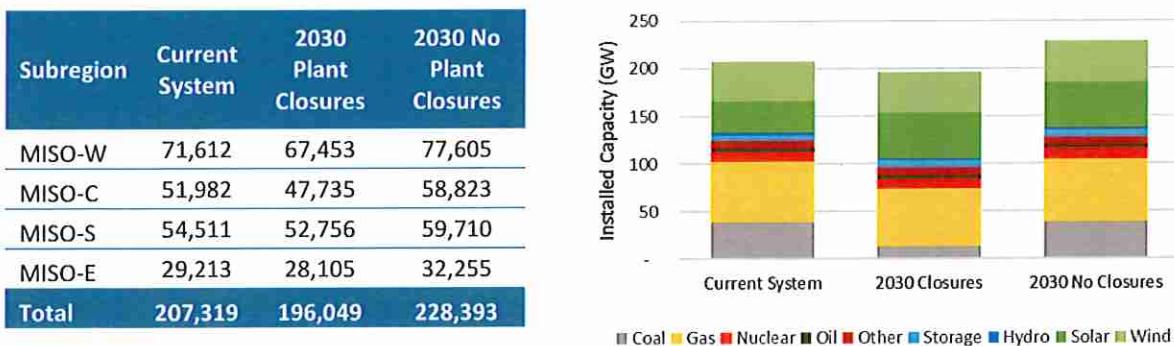


Figure 11. MISO Generation Capacity by Technology and Scenario

MISO's generation mix was comprised primarily of natural gas, coal, wind, and solar. In 2024, natural gas comprised 31% of nameplate, wind comprised 20%, coal 18%, and solar 14%. In 2030, most retirements come from coal and natural gas while additions occur for solar, batteries, and wind. In addition, the model assumed 3 GW of rooftop solar and 8 GW of demand response.

26. The total installed capacity numbers reported in this regional analysis section do not reflect the generating capability of all resources during stress conditions.

Table 3. Nameplate Capacity by MISO Subregion and Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	37,914	64,194	11,127	2,867	8,717	5,427	2,533	32,826	41,715	207,319
MISO-W	12,651	13,608	2,753	1,491	2,613	200	777	8,109	29,411	71,612
MISO-C	15,050	10,307	2,169	494	2,211	1,272	769	12,361	7,350	51,982
MISO-S	5,493	31,052	5,100	589	2,469	54	845	8,315	596	54,511
MISO-E	4,720	9,227	1,105	292	1,424	3,901	143	4,042	4,359	29,213
Additions	0	2,535	0	330	0	1,929	0	14,354	1,926	21,074
MISO-W	0	537	0	172	0	374	0	3,552	1,358	5,993
MISO-C	0	407	0	57	0	934	0	5,103	339	6,841
MISO-S	0	1,226	0	68	0	9	0	3,868	27	5,199
MISO-E	0	364	0	34	0	611	0	1,831	201	3,042
Closures	(24,913)	(6,597)	0	(324)	(140)	(16)	(83)	0	(272)	(32,345)
MISO-W	(8,313)	(1,398)	0	(168)	(56)	0	(25)	0	(192)	(10,152)
MISO-C	(9,889)	(1,059)	0	(56)	(7)	(3)	(25)	0	(48)	(11,088)
MISO-S	(3,609)	(3,191)	0	(67)	(55)	(0)	(28)	0	(4)	(6,954)
MISO-E	(3,102)	(948)	0	(33)	(21)	(13)	(5)	0	(28)	(4,150)

2.2 ISO-NE

In the current system model and the No Plant Closures case, ISO-NE did not experience shortfall events. The region maintained adequacy throughout the study period through reliance on imports. In the Plant Closures case, ISO-NE still did not exceed any key reliability thresholds, despite moderate retirements. This finding is partly due to the absence of additional AI or data center load growth modeled in the region. Accordingly, no additional perfect capacity was deemed necessary by 2030 to meet the study's reliability standards.

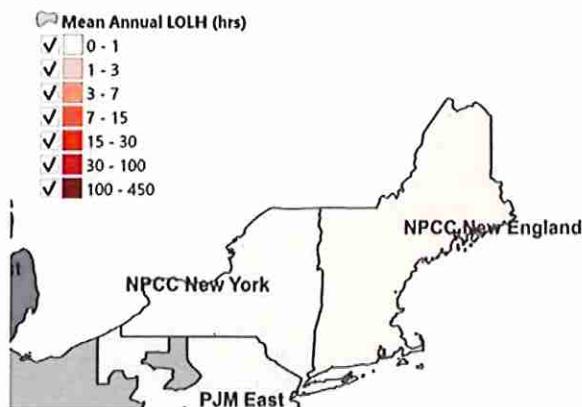


Table 4. Summary of ISO-NE Reliability Metrics

Reliability Metric	2030 Projection			
	Current System	Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	-	-	-	-
Normalized Unserved Energy (%)	-	-	-	-
Unserved Load (MWh)	-	-	-	-
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	-	-	-	-
Normalized Unserved Load (%)	-	-	-	-
Unserved Load (MWh)	-	-	-	-
Max Unserved Load (MW)	-	-	-	-

Load Assumptions

ISO-NE's peak load was roughly 28 GW in the current model and projected to increase to roughly 31 GW by 2030. No additional AI/DCs were projected to be installed.

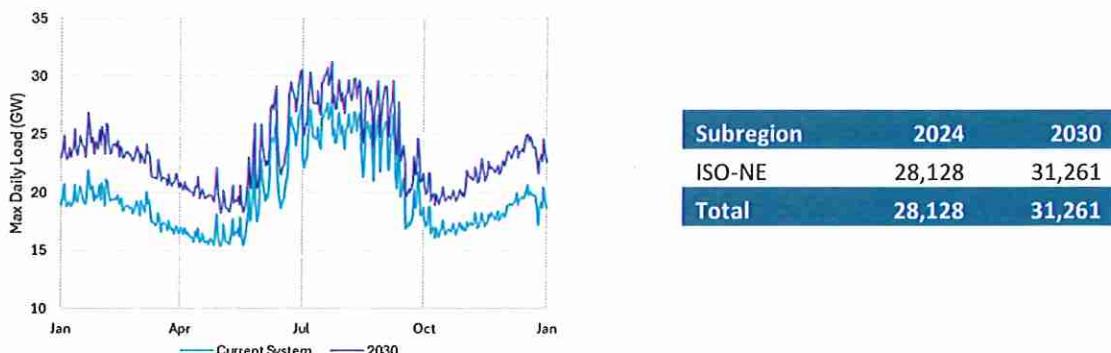


Figure 12. ISO-NE Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was approximately 40 GW. In 2030, 5.5 GW of new capacity was added leading to 45.5 GW of capacity in the No Plant Closures case. In the Plant Closures case, 2.7 GW of capacity was retired such that net generation change in the Plant Closures case was +11 GW, or 42.8 GW of overall installed capacity on the system.

Subregion	Current System	2030 Plant Closures	2030 No Plant Closures
ISO-NE	39,979	42,845	45,534
Total	39,979	42,845	45,534

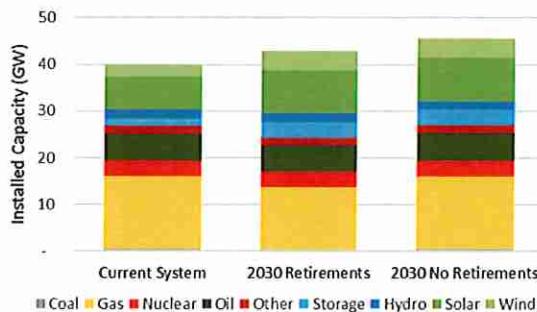


Figure 13. ISO-NE Generation Capacity by Technology and Scenario

ISO-NE's generation mix was comprised primarily of natural gas, solar, oil, and nuclear. In 2024, natural gas comprised 39% of nameplate, solar comprised 17%, oil 14%, and nuclear 8%. In 2030, most retirements come from coal and natural gas while additions occur for solar, storage, and wind. The model assumed nearly 2 GW of rooftop solar and 1.6 GW of energy storage.

Table 5. Nameplate Capacity by ISO-NE Subregion and Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	541	15,494	3,331	5,710	1,712	1,628	1,911	7,099	2,553	39,979
ISONE	541	15,494	3,331	5,710	1,712	1,628	1,911	7,099	2,553	39,979
Additions	0	90	0	181	0	1,607	0	2,183	1,495	5,555
ISONE	0	90	0	181	0	1,607	0	2,183	1,495	5,555
Closures	(534)	(1,875)	0	(203)	(77)	0	0	0	0	(2,690)
ISONE	(534)	(1,875)	0	(203)	(77)	0	0	0	0	(2,690)

2.3 NYISO

In both the current system model and the No Plant Closures case, NYISO maintained reliability and did not exceed any shortfall thresholds. Adequacy was preserved through reliance on imports. In the Plant Closures case, NYISO experienced shortfalls but average annual LOLH remaining well below the 2.4-hour threshold and NUSE under the 0.002% standard. The worst weather year produced only 6 hours of lost load and a peak unserved load of 914 MW. Given the modest impact of retirements and no additional AI/data center load modeled, the study concluded that NYISO would not require additional perfect capacity to remain reliable through 2030.

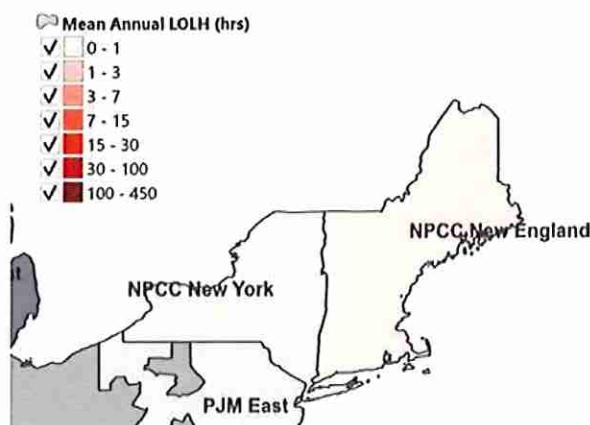


Table 6. Summary of NYISO Reliability Metrics

Reliability Metric	2030 Projection			
	Current System	Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	0.2	0.5	-	-
Normalized Unserved Energy (%)	0.00001	0.0001	-	-
Unserved Load (MWh)	18	209	-	-
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	2	6	-	-
Normalized Unserved Load (%)	0.0001	0.0013	-	-
Unserved Load (MWh)	216	2,505	-	-
Max Unserved Load (MW)	194	914	-	-

Load Assumptions

NYISO's peak load was roughly 36 GW in the current system model and projected to increase to roughly 38 GW by 2030. No additional AI/DCs were projected to be installed.

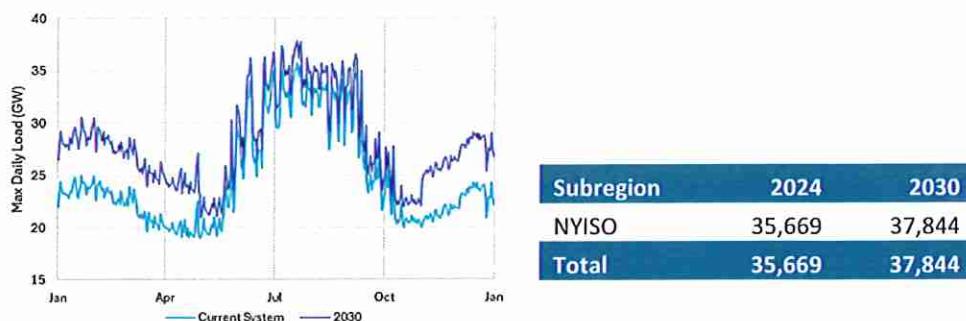


Figure 14. NYISO Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was approximately 46 GW. In 2030, 5.5 GW of new capacity was added leading to 51 GW of capacity in the No Plant Closures case. In the Plant Closures case, 1 GW of capacity was retired such that net generation in the Plant Closures case was +4 GW, or 50 GW of overall installed capacity on the system.

Subregion	Current System	2030 Plant Closures	2030 No Plant Closures
NYISO	45,924	50,396	51,444
Total	45,924	50,396	51,444

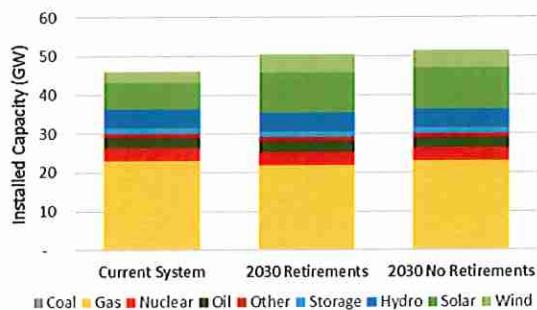


Figure 15. NYISO Generation Capacity by Technology and Scenario

NYISO's generation mix was comprised primarily of natural gas, solar, and hydro. In 2024, natural gas comprised 50% of total nameplate generation, solar comprised 14%, and hydro 11%. In 2030, most retirements come from natural gas while additions occur for solar and wind. The model assumed 6 GW of rooftop solar and nearly 1 GW of demand response.

Table 7. Nameplate Capacity by NYISO Subregion and Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	0	22,937	3,330	2,631	1,194	1,460	4,915	6,749	2,706	45,924
NYISO	0	22,937	3,330	2,631	1,194	1,460	4,915	6,749	2,706	45,924
Additions	0	0	0	15	0	0	0	3,604	1,902	5,521
NYISO	0	0	0	15	0	0	0	3,604	1,902	5,521
Closures	0	(1,030)	0	(19)	0	0	0	0	0	(1,049)
NYISO	0	(1,030)	0	(19)	0	0	0	0	0	(1,049)

2.4 PJM

In the current system model, PJM experienced shortfalls, but they were below the required threshold. In the No Plant Closures case, shortfalls increased dramatically, with 214 average annual LOLH and peak unserved load reaching 17,620 MW, indicating growing strain even without retirements. In the Plant Closures case, reliability metrics worsened significantly, with annual LOLH surging to over 430 hours per year and NUSE reaching 0.1473%—over 70 times the accepted threshold. During the worst weather year, 1,052 hours of load were shed. To restore reliability, the study found that PJM would require 10,500 MW of additional perfect capacity by 2030.

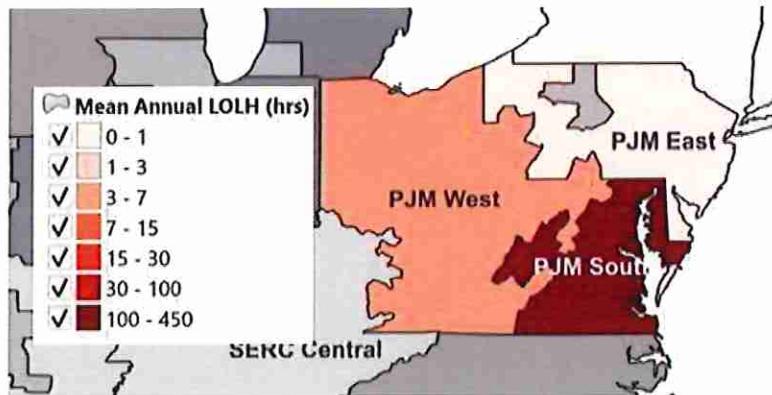


Table 8. Summary of PJM Reliability Metrics

Reliability Metric	2030 Projection			
	Current System	Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	2.4	430.3	213.7	1.4
Normalized Unserved Energy (%)	0.0008	0.1473	0.0657	0.0003
Unserved Load (MWh)	6,891	1,453,513	647,893	2,536
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	29	1,052	644	17
Normalized Unserved Load (%)	0.0100	0.4580	0.2703	0.0031
Unserved Load (MWh)	82,687	1,453,513	647,893	2,536
Max Unserved Load (MW)	4,975	21,335	17,620	4,162

Load Assumptions

PJM's peak load was roughly 162 GW in the current system model and projected to increase to roughly 187 GW by 2030. Approximately 15 GW of this relates to new AI/DC being installed (29% of U.S. total), primarily in PJM-S.

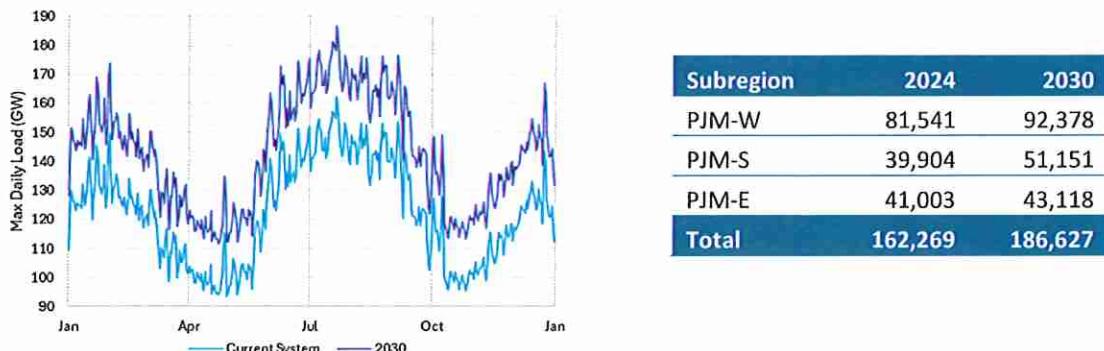


Figure 16. PJM Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was approximately 215 GW. In 2030, 39 GW of new capacity was added leading to 254 GW of capacity in the No Plant Closures case. In the Plant Closures case, 17 GW of capacity was retired such that net generation in the Plant Closures case was +22 GW, or 237 GW of overall nameplate capacity on the system.

Subregion	Current System	2030 Plant Closures	2030 No Plant Closures
PJM-W	114,467	123,100	135,810
PJM-S	39,951	48,850	50,667
PJM-E	60,221	64,848	67,027
Total	214,638	236,798	253,504

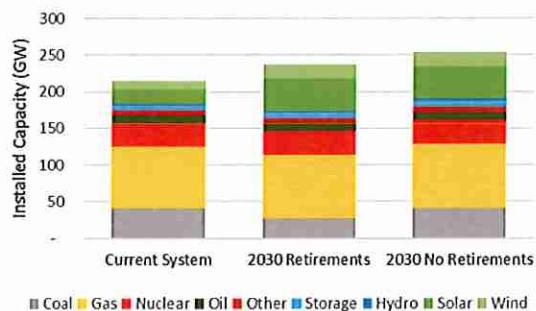


Figure 17. PJM Generation Capacity by Technology and Scenario

PJM's generation mix was comprised primarily of natural gas, coal, and nuclear. In 2024, natural gas comprised 39% of nameplate, coal comprised 19%, and nuclear 15%. In 2030, most retirements come from coal and some natural gas and oil while significant additions occur for solar plus lesser additions of wind, storage, and natural gas. The model assumed 9 GW of rooftop solar and 7 GW of demand response.

Table 9. Nameplate Capacity by PJM Subregion and Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	39,915	84,381	32,535	9,875	8,248	5,400	3,071	19,495	11,718	214,638
PJM-W	34,917	39,056	16,557	1,933	3,926	383	1,252	6,379	10,065	114,467
PJM-S	2,391	15,038	5,288	3,985	2,303	3,085	1,070	6,430	360	39,951
PJM-E	2,608	30,287	10,690	3,956	2,019	1,932	749	6,686	1,294	60,221
Additions	0	4,499	0	32	317	1,938	0	24,991	7,089	38,866
PJM-W	0	2,082	0	6	135	855	0	12,176	6,089	21,343
PJM-S	0	802	0	13	102	726	0	8,856	218	10,717
PJM-E	0	1,615	0	13	81	357	0	3,958	783	6,806
Closures	(13,253)	(1,652)	0	(1,790)	(11)	0	0	0	0	(16,706)
PJM-W	(11,593)	(765)	0	(350)	(1)	0	0	0	0	(12,710)
PJM-S	(794)	(294)	0	(722)	(6)	0	0	0	0	(1,817)
PJM-E	(866)	(593)	0	(717)	(3)	0	0	0	0	(2,179)

2.5 SERC

In the current system model and the No Plant Closures case, SERC maintained overall adequacy, though some subregions—particularly SERC-East—faced emerging winter reliability risks. In the Plant Closures case, shortfalls became more severe, with SERC-East experiencing increased unserved energy and loss of load hours during extreme cold events, including 42 hours of outages in a single winter storm. The analysis identified that planned retirements, combined with rising winter load from electrification, would stress the system. To restore reliability in SERC-East, the study found that 500 MW of additional perfect capacity would be needed by 2030. Other SERC subregions performed adequately, but continued monitoring is warranted due to shifting seasonal peaks and fuel supply vulnerabilities.

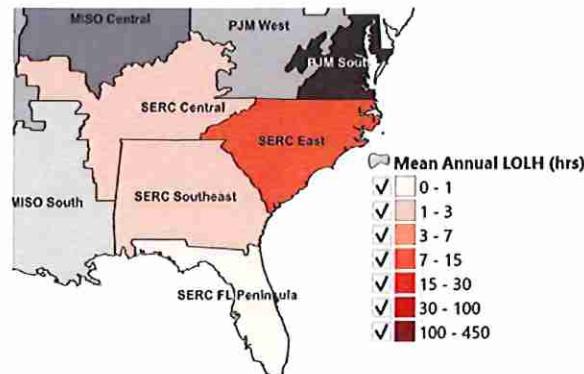
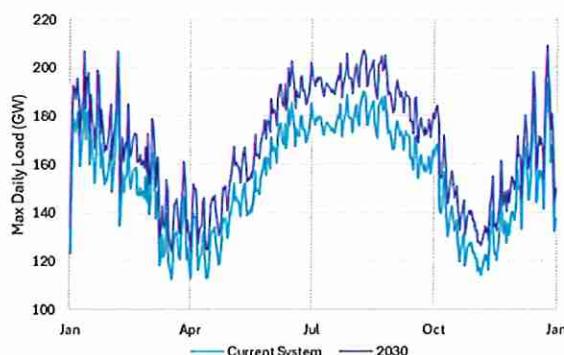


Table 10. Summary of SERC Reliability Metrics

Reliability Metric	2030 Projection			
	Current System	Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	0.3	8.1	1.2	0.8
Normalized Unserved Energy (%)	0.0001	0.0041	0.0004	0.0002
Unserved Load (MWh)	489	44,514	3,748	2,373
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	4	42	14	10
Normalized Unserved Load (%)	0.0006	0.0428	0.0042	0.0026
Unserved Load (MWh)	5,683	465,392	44,977	2,373
Max Unserved Load (MW)	2,373	19,381	6,359	5,859

Load Assumptions

SERC's peak load was roughly 193 GW in the current system model and projected to increase to roughly 209 GW by 2030. Approximately 7.5 GW of this relates to new AI/DCs being installed (14% of U.S. total).



Subregion	2024	2030
SERC-C	50,787	52,153
SERC-SE	48,235	54,174
SERC-FL	58,882	62,572
SERC-E	51,693	56,313
Total	193,654	209,269

Figure 18. SERC Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was approximately 254 GW. In 2030, 26 GW of new capacity was added leading to 279 GW of capacity in the No Plant Closures case. In the Plant Closures case, 19 GW of capacity was retired such that net generation change in the Plant Closures case was +7 GW, or 260 GW of overall installed capacity on the system.

Subregion	Current System	2030 Plant Closures	2030 No Plant Closures
SERC-C	53,978	54,014	59,660
SERC-SE	67,073	64,768	69,478
SERC-FL	72,714	83,127	86,173
SERC-E	59,914	58,513	63,973
Total	253,680	260,423	279,285

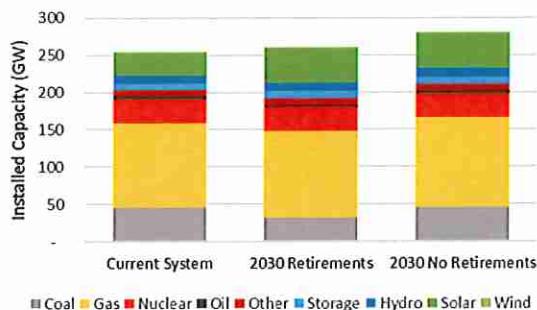


Figure 19. SERC Generation Capacity by Technology and Scenario

SERC's generation mix was comprised primarily of natural gas, coal, nuclear, and solar. In 2024, natural gas comprised 45% of nameplate, coal comprised 18%, nuclear 12%, and solar 11%. In 2030, most retirements come from coal and natural gas while additions occur for solar and some storage. The model assumed 3 GW of rooftop solar and 8 GW of demand response.

Table 11. Nameplate Capacity by SERC Subregion and Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	45,747	113,334	31,702	4,063	8,779	7,469	11,425	30,180	982	253,680
SERC-C	13,348	20,127	8,280	148	1,887	1,884	4,995	2,328	982	53,978
SERC-SE	13,275	29,866	8,018	915	2,493	1,662	3,260	7,584	0	67,073
SERC-FL	4,346	47,002	3,502	1,957	3,198	538	0	12,172	0	72,714
SERC-E	14,777	16,340	11,902	1,044	1,202	3,384	3,170	8,096	0	59,914
Additions	0	6,898	0	0	381	2,254	0	16,073	0	25,606
SERC-C	0	4,831	0	0	0	80	0	771	0	5,682
SERC-SE	0	906	0	0	19	0	0	3,135	0	4,059
SERC-FL	0	1,161	0	0	218	1,670	0	10,410	0	13,459
SERC-E	0	0	0	0	144	504	0	1,757	0	2,405
Closures	(14,075)	(4,115)	0	(672)	0	0	0	0	0	(18,862)
SERC-C	(4,465)	(1,181)	0	0	0	0	0	0	0	(5,646)
SERC-SE	(5,160)	(124)	0	(176)	0	0	0	0	0	(5,460)
SERC-FL	(1,495)	(1,071)	0	(480)	0	0	0	0	0	(3,046)
SERC-E	(2,955)	(1,739)	0	(16)	0	0	0	0	0	(4,710)

2.6 SPP

In the current system model, SPP experienced shortfalls, but they were below the required threshold. Adequacy was preserved through reliance on imports. In the No Plant Closures case, SPP experienced persistent reliability challenges, with average annual LOLH reaching approximately 48 hours per year and peak hourly shortfalls affecting up to 19% of demand. In the Plant Closures case, system conditions deteriorated further, with unserved energy and outage hours increasing substantially. These shortfalls were concentrated in the northern subregion, which lacks the firm generation and import capacity needed to meet peak winter demand. The analysis determined that 1,500 MW of additional perfect capacity would be needed in SPP by 2030 to restore reliability.

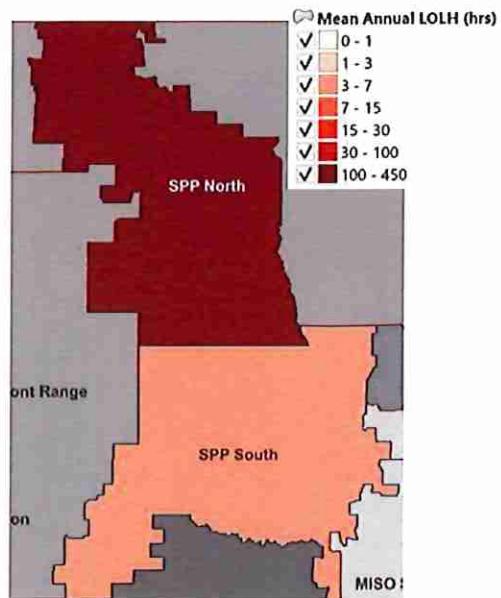


Table 12. Summary of SPP Reliability Metrics

Reliability Metric	2030 Projection			
	Current System	Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	1.7	379.6	47.8	2.4
Normalized Unserved Energy (%)	0.0002	0.0911	0.0081	0.0002
Unserved Load (MWh)	541	313,797	27,697	803
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	20	556	186	26
Normalized Unserved Load (%)	0.0022	0.2629	0.0475	0.0027
Unserved Load (MWh)	6,492	907,518	163,775	9,433
Max Unserved Load (MW)	606	13,263	2,432	762

Load Assumptions

SPP's peak load was roughly 57 GW in the current system model and projected to increase to roughly 63 GW by 2030. Approximately 1.5 GW of this relates to new AI/DCs being installed (3% of U.S. total).

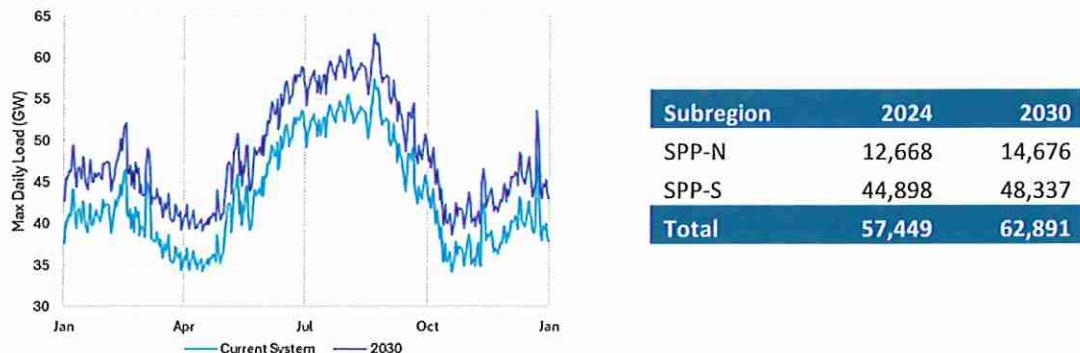


Figure 20. SPP Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was 95 GW. In 2030, 15 GW of new capacity was added leading to 110 GW of capacity in the No Plant Closures case. In the Plant Closures case, 7 GW of capacity was retired such that net generation change in the 2030 Plant Closures case was +8 GW, or 103 GW of overall installed capacity on the system.

Subregion	Current System	2030 Plant Closures	2030 No Plant Closures
SPP-N	20,065	20,679	22,385
SPP-S	75,078	82,451	88,064
Total	95,142	103,130	110,449

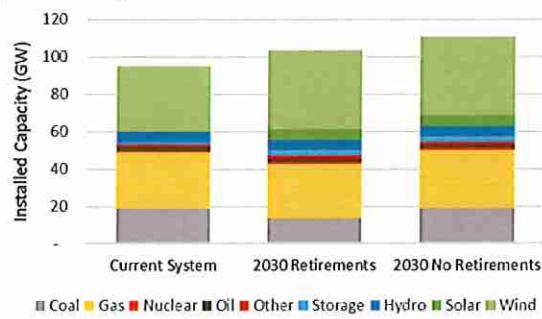


Figure 21. SPP Generation Capacity by Technology and Scenario

SPP's generation mix was comprised primarily of wind, natural gas, and coal. In 2024, wind comprised 36% of nameplate, natural gas comprised 32%, and coal 20%. In the 2030 case, most retirements come from coal and natural gas while additions occur for wind, solar, storage, and natural gas. The model assumed almost no rooftop solar and 1.3 GW of demand response.

Table 13. Nameplate Capacity by SPP Subregion and Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	18,919	30,003	769	1,626	1,718	1,522	5,123	774	34,689	95,142
SPP-N	5,089	3,467	304	504	519	8	3,041	91	7,041	20,065
SPP-S	13,829	26,536	465	1,121	1,199	1,514	2,082	683	27,649	75,078
Additions	0	1,094	0	7	462	1,390	0	5,288	7,066	15,306
SPP-N	0	126	0	2	114	11	0	633	1,434	2,320
SPP-S	0	968	0	5	348	1,379	0	4,655	5,632	12,987
Closures	(5,530)	(1,732)	0	(56)	0	0	0	0	0	(7,318)
SPP-N	(1,488)	(200)	0	(17)	0	0	0	0	0	(1,705)
SPP-S	(4,042)	(1,532)	0	(39)	0	0	0	0	0	(5,613)

2.7 CAISO+

In the current system and No Plant Closures cases, CAISO+ did not experience major reliability issues, though adequacy was often maintained through significant imports during tight conditions. In the Plant Closures case, however, the region faced substantial shortfalls, particularly during summer evening hours when solar output declines. Average LOLH reached 7 hours per year, and the worst-case year showed load shed events affecting up to 31% of demand. The NUSE exceeded reliability thresholds, signaling the system's vulnerability to high load and low renewable output periods.

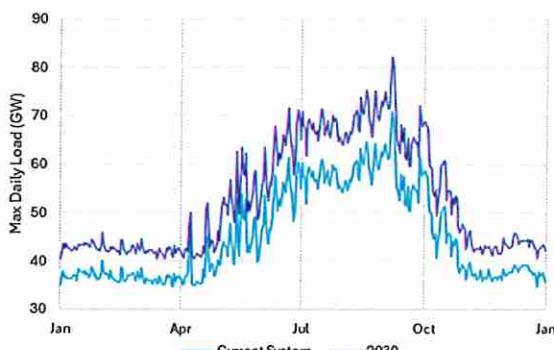


Table 14. Summary of CAISO+ Reliability Metrics

Reliability Metric	Current System	2030 Projection		
		Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	-	6.8	-	-
Normalized Unserved Energy (%)	-	0.0062	-	-
Unserved Load (MWh)	-	23,488	-	-
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	-	21	-	-
Normalized Unserved Load (%)	-	0.0195	-	-
Unserved Load (MWh)	-	73,462	-	-
Max Unserved Load (MW)	-	12,391	-	-

Load Assumptions

CAISO+'s peak load was roughly 79 GW in the current system model and projected to increase to roughly 82 GW by 2030. Approximately 2 GW of this relates to new AI/DCs being installed (4% of U.S. total).



Subregion	2024	2030
CALI-N	29,366	34,066
CALI-S	41,986	48,666
Total	70,815	82,146

Figure 22. CAISO+ Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was approximately 117 GW. In 2030, 14 GW of new capacity was added leading to 131 GW of capacity in the No Plant Closures case. In the Plant Closures case, 8 GW of capacity was retired such that net closures in the Plant Closures case were +6 GW, or 123 GW of overall installed capacity on the system.

Subregion	Current System	2030 Plant Closures	2030 No Plant Closures
CALI-N	47,059	48,897	52,501
CALI-S	69,866	74,041	78,308
Total	116,925	122,938	130,809

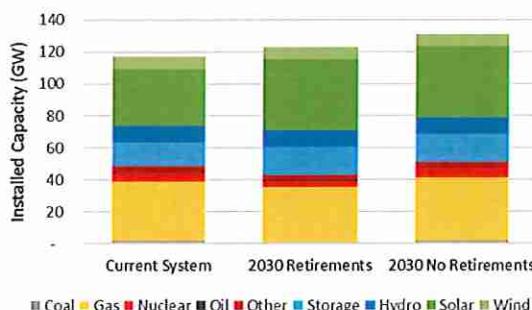


Figure 23. CAISO+ Generation Capacity by Technology and Scenario

CAISO+'s generation mix was comprised primarily of natural gas, solar, storage, and hydro. In 2024, natural gas comprised 32% of nameplate, solar comprised 31%, storage 13%, and hydro 9%. In 2030, most retirements come from coal, natural gas, and nuclear while additions occur for solar and storage. The model assumed 10 GW of rooftop solar and less than 1 GW of demand response.

Table 15. Nameplate Capacity by CAISO+ Subregion and Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	1,816	37,434	5,582	185	3,594	14,670	10,211	35,661	7,773	116,925
CALI-N	0	12,942	5,582	165	1,872	4,639	8,727	11,759	1,373	47,059
CALI-S	1,816	24,492	0	20	1,722	10,031	1,483	23,902	6,400	69,866
Additions	0	2,126	0	0	92	3,161	0	8,507	0	13,885
CALI-N	0	735	0	0	44	757	0	3,906	0	5,442
CALI-S	0	1,391	0	0	48	2,404	0	4,600	0	8,442
Closures	(1,800)	(3,771)	(2,300)	0	0	0	0	0	0	(7,871)
CALI-N	0	(1,304)	(2,300)	0	0	0	0	0	0	(3,604)
CALI-S	(1,800)	(2,467)	0	0	0	0	0	0	0	(4,267)

2.8 West Non-CAISO

In both the current system and No Plant Closures cases, the West Non-CAISO region maintained adequacy on average. In the Plant Closures case, the region's reliability declined, with annual LOLH increasing and peak shortfalls in the worst year affecting up to 20% of hourly load in some subregions. While overall NUSE normalized unserved energy remained just above the 0.002% threshold, specific areas, especially those with limited local resources and constrained transmission, exceeded acceptable risk levels. These reliability gaps were primarily driven by increasing reliance on variable energy resources without sufficient firm generation.

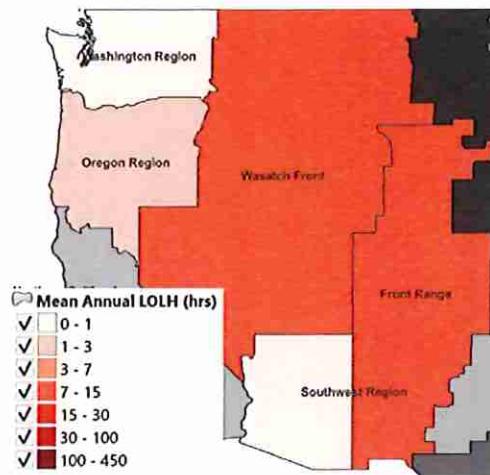
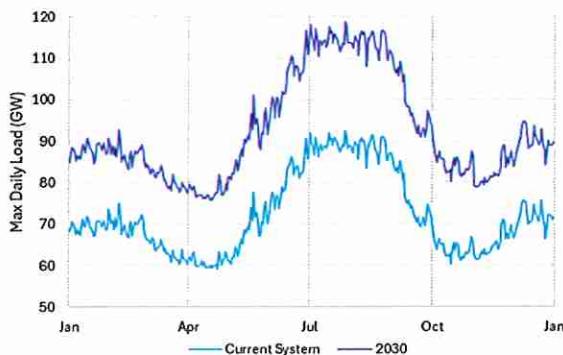


Table 16. Summary of West Non-CAISO Reliability Metrics

Reliability Metric	Current System	2030 Projection		
		Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	-	17.8	-	-
Normalized Unserved Energy (%)	-	0.0032	-	-
Unserved Load (MWh)	-	21,785	-	-
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	-	47	-	-
Normalized Unserved Load (%)	-	0.0098	-	-
Unserved Load (MWh)	-	66,248	-	-
Max Unserved Load (MW)	-	5,071	-	-

Load Assumptions

West Non-CAISO's peak load was roughly 92 GW in the current system model and projected to increase to roughly 119 GW by 2030. Approximately 12 GW of this relates to new AI/DCs being installed (24% of U.S. total).



Subregion	2024	2030
WASHINGTON	20,756	23,187
OREGON	11,337	16,080
SOUTHWEST	23,388	30,169
WASATCH	27,161	35,440
FRONT R	20,119	24,996
Total	92,448	118,657

Figure 24. West Non-CAISO Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was 178 GW. In 2030, 29 GW of new capacity was added leading to 207 GW of capacity in the No Plant Closures case. In the Plant Closures case, 13 GW of capacity was retired such that net generation change in the Plant Closures case was 16 GW, or 193 GW of overall installed capacity on the system.

Subregion	Current System	2030 Plant Closures	2030 No Plant Closures
WASHINGTON	35,207	36,588	37,573
OREGON	19,068	21,689	22,081
SOUTHWEST	42,335	47,022	49,158
WASATCH	42,746	45,175	50,251
FRONT R	38,572	43,011	47,844
Total	177,929	193,485	206,908

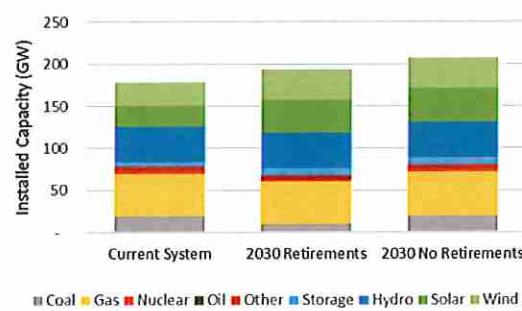


Figure 25. West Non-CAISO Generation Capacity by Technology and Scenario

West Non-CAISO's generation mix was comprised primarily of natural gas, hydro, wind, solar, and coal. In 2024, natural gas comprised 28% of nameplate, hydro comprised 24%, wind 15%, solar 13%, and coal 11%. In 2030, most retirements come from coal and natural gas while additions occur for solar, wind, storage, and natural gas. The model assumed 6 GW of rooftop solar and over 1 GW of demand response.

Table 17. Nameplate Capacity by West Non-CAISO Subregion and Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	19,850	49,969	3,820	644	4,114	5,104	42,476	24,652	27,298	177,929
WASHINGTON	560	3,919	1,096	17	595	489	24,402	1,438	2,690	35,207
OREGON	0	3,915	0	6	456	482	8,253	2,517	3,440	19,068
SOUTHWEST	4,842	17,985	2,724	323	1,316	2,349	1,019	8,093	3,685	42,335
WASATCH	7,033	14,061	0	87	1,433	1,194	7,587	7,299	4,052	42,746
FRONT R	7,415	10,089	0	211	314	590	1,215	5,306	13,432	38,572
Additions	0	2,320	0	1	8	2,932	0	14,759	8,959	28,979
WASHINGTON	0	246	0	0	0	109	0	1,059	952	2,366
OREGON	0	246	0	0	0	150	0	1,399	1,218	3,013
SOUTHWEST	0	309	0	0	0	2,338	0	3,578	599	6,823
WASATCH	0	884	0	0	7	233	0	4,946	1,435	7,505
FRONT R	0	634	0	0	0	102	0	3,779	4,756	9,271
Closures	(9,673)	(2,540)	0	(6)	(311)	(170)	(627)	0	(95)	(13,422)
WASHINGTON	(317)	(195)	0	(0)	(66)	(28)	(369)	0	(11)	(986)
OREGON	0	(195)	0	(0)	(58)	0	(125)	0	(14)	(392)
SOUTHWEST	(1,185)	(951)	0	0	0	0	0	0	0	(2,136)
WASATCH	(3,978)	(699)	0	(2)	(178)	(89)	(115)	0	(16)	(5,077)
FRONT R	(4,194)	(501)	0	(4)	(8)	(53)	(18)	0	(54)	(4,832)

2.9 ERCOT

In the current system model, ERCOT exceeded reliability thresholds, with 3.8 annual Loss of Load Hours and a NUSE of 0.0032%, indicating stress even before future retirements and load growth. In the No Plant Closures case, conditions worsened as average LOLH rose to 20 hours per year and the worst-case year reached 101 hours, driven by data center growth and limited dispatchable additions. The Plant Closures case intensified these risks, with average annual LOLH rising to 45 hours per year and unserved load reaching 0.066%. Peak shortfalls reached 27% of demand, with outages concentrated in winter when generation is most vulnerable. To meet reliability targets, ERCOT would require 10,500 MW of additional perfect capacity by 2030.

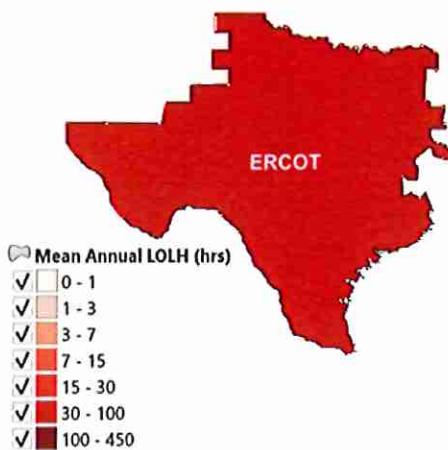


Table 18. Summary of ERCOT Reliability Metrics

Reliability Metric	2030 Projection			
	Current System	Plant Closures	No Plant Closures	Required Build
AVERAGE OVER 12 WEATHER YEARS				
Average Loss of Load Hours	3.8	45.0	20.3	1.0
Normalized Unserved Energy (%)	0.0032	0.0658	0.0284	0.0008
Unserved Load (MWh)	15,378	397,352	171,493	4,899
WORST WEATHER YEAR				
Max Loss of Load Hours in Single Year	30	149	101	12
Normalized Unserved Load (%)	0.0286	0.02895	0.01820	0.0098
Unserved Load (MWh)	136,309	1,741,003	1,093,560	58,787
Max Unserved Load (MW)	10,115	27,156	23,105	8,202

Load Assumptions

ERCOT's peak load was roughly 90 GW in the current system model and projected to increase to roughly 105 GW by 2030. Approximately 8 GW of this relates to new data centers being installed (62% of U.S. total).

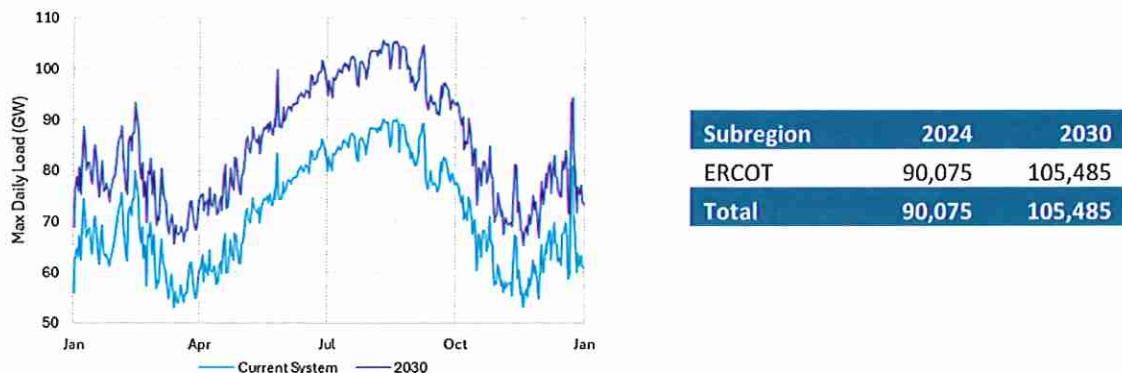


Figure 26. ERCOT Max Daily Load in the Current System versus 2030

Generation Stack

Total installed generating capacity for 2024 was 157 GW. In 2030, 55 GW of new capacity was added leading to 213 GW of capacity in the No Plant Closures case. In the Plant Closures case, 4 GW of capacity was retired such that net generation change in the Plant Closures case was +51 GW, or 208 GW of overall nameplate capacity on the system.

Subregion	Current System	2030 Plant Closures	2030 No Plant Closures
ERCOT	157,490	208,894	212,916
Total	157,490	208,894	212,916

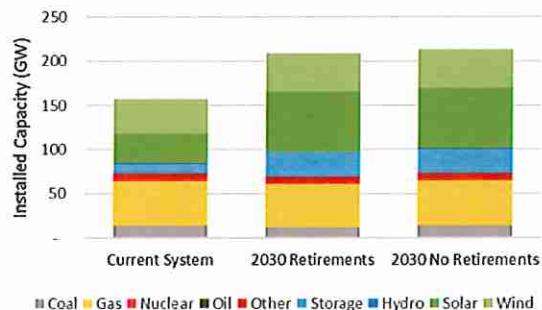


Figure 27. ERCOT Generation Capacity by Technology and Scenario

ERCOT's generation mix was comprised primarily of natural gas, wind, and solar. In 2024, natural gas comprised 32% of nameplate, wind comprised 25%, and solar 22%. In 2030, most retirements come from coal and natural gas while additions occur for solar, storage, and wind. The model assumed 2.5 GW of rooftop solar and 3.5 GW of demand response.

Table 19. Nameplate Capacity for ERCOT and by Technology (MW)

	Coal	Gas	Nuclear	Oil	Other	Storage	Hydro	Solar	Wind	Total
2024	13,568	50,889	4,973	10	3,627	10,720	583	33,589	39,532	157,490
ERCOT	13,568	50,889	4,973	10	3,627	10,720	583	33,589	39,532	157,490
Additions	0	569	0	0	0	16,538	0	34,681	3,638	55,426
ERCOT	0	569	0	0	0	16,538	0	34,681	3,638	55,426
Closures	(2,000)	(2,022)	0	0	0	0	0	0	0	(4,022)
ERCOT	(2,000)	(2,022)	0	0	0	0	0	0	0	(4,022)

Appendix A - Generation Calibration and Forecast

The study team started with the grid model from the NERC ITCS, which was published in 2024 with reference to NERC 2023 LTRA capacity.²⁷ This zonal ITCS model serves as the starting point for the network topology (covering 23 U.S. regions), transmission capacity between zones, and general modeling assumptions. The resource mix and retirements in the ITCS model were updated for this study to reflect the various 2030 scenarios discussed previously. Prior to developing the 2030 scenarios, the study team also updated the 2024 ITCS model to ensure consistency in the current model assumptions.

2024 Resource Mix

Because there were noted changes in assumed capacity additions between the 2023 and 2024 LTRAs²⁸, the ITCS model was updated with the 2024 LTRA data, provided directly by NERC to the study team. The 2024 LTRA dataset, reported at the NERC assessment area level—which is more aggregated in some areas than the ITCS regional structure (covering 13 U.S. regions; see Figure A.1)—includes both existing resource capacities²⁹ and Tier 1, 2, and 3 planned additions for each year from 2024 to 2033. As explained below, to incorporate this data into the ITCS model, a mapping process was developed to disaggregate generation capacities from the NERC assessment areas to the more granular ITCS regions by technology type. To preserve the daily or monthly adjustments to generator availability for certain categories (wind, solar, hybrid, hydropower, batteries, and other) by using the ITCS methods, the nameplate LTRA capacity was used. For all other categories (mostly thermal generators), summer and winter on-peak capacity contributions were used.

27. NERC, "Interregional Transfer Capability Study (ITCS)." https://www.nerc.com/pa/RAPA/Documents/ITCS_Final_Report.pdf.

28. NERC, "2024 Long-Term Reliability Assessment," December, 2024, 24. https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_Long%20Term%20Reliability%20Assessment_2024.pdf.

29. Capacities are reported for both winter and summer seasonal ratings, along with nameplate values.

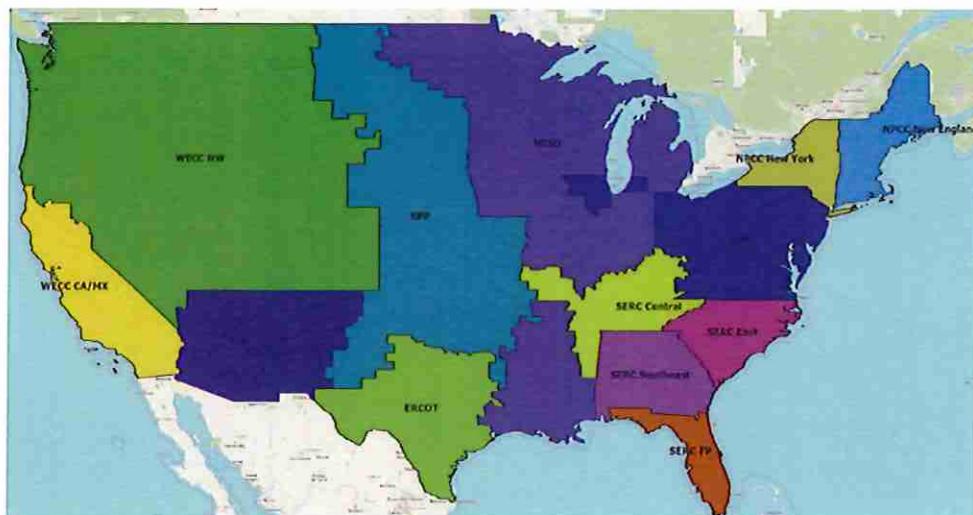


Figure A.1. NERC assessment areas.

To disaggregate generation capacity from the NERC assessment areas to the ITCS regions, EIA 860 plant-level data were used to tabulate the generation capacity for each ITCS region and NERC assessment area. The geographical boundaries for the NERC assessment areas and the ITCS regions were constructed based on ReEDS zones.³⁰ Disaggregation fractions were then calculated by technology type using the combined existing capacity and planned additions through 2030 from EIA 860 data as of December 2024. Specifically, to compute each fraction, an ITCS region's total (existing plus planned) capacity was divided by the corresponding total capacity across all ITCS regions within the same mapped NERC assessment area and fuel type group:

$$Fraction_{rf} = \frac{Capacity_{rf}}{\sum_{r' \in ITCS(R)} Capacity_{r'f}} \quad (Equation.1)$$

Where $Capacity_{rf}$ is the capacity of fuel type f in ITCS region r and $ITCS(R)$ is the set of all ITCS regions mapped to the same NERC assessment area R . The denominator is the total capacity of that fuel type across all ITCS regions mapped to R .

Note that in cases where NERC assessment areas align one-to-one with ITCS regions, no mapping was required. Table A.1 summarizes which areas exhibited a direct one-to-one matching and which required disaggregation (1-to-many) or aggregation (many-to-one) to align with the ITCS regional structure.

An exception to this general approach is the case of the Front Range ITCS region, which geographically spans across two NERC assessment areas—WECC-NW and WECC-SW—resulting in two-to-one mapping. For this case, a separate allocation method was used: Plant-level data from EIA 860 were analyzed to determine the proportion of Front Range capacity located in each NERC area. These proportions were then used to derive custom weighting factors for allocating capacities from both WECC-NW and WECC-SW into the Front Range region.

30. NREL, "Regional Energy Development System," <https://www.nrel.gov/analysis/reeds/>.

Table A.1. Mapping of NERC assessment areas to ITCS regions.

NERC Area	ITCS Region	Match
ERCOT	ERCOT	1 to 1
NPCC-New England	NPCC-New England	1 to 1
NPCC-New York	NPCC-New York	1 to 1
SERC-C	SERC-C	1 to 1
SERC-E	SERC-E	1 to 1
SERC-FP	SERC-FP	1 to 1
SERC-SE	SERC-SE	1 to 1
WECC-SW	Southwest Region	1 to 1
MISO	MISO Central	
MISO	MISO East	
MISO	MISO South	1 to 4
MISO	MISO West	
SPP	SPP North	
SPP	SPP South	1 to 2
WECC-CAMX	Southern California	
WECC-CAMX	Northern California	1 to 2
WECC-NW	Oregon Region	
WECC-NW	Washington Region	1 to 3
WECC-NW	Wasatch Front	
WECC-NW	Front Range	
WECC-SW	Front Range	2 to 1

Table A.2 and Figure A.2 show the same combined capacities by ITCS region and NERC planning region, respectively.

Table A.2. Existing and Tier 1 capacities by NERC assessment area (in MW) in 2024.

2024 Existing + Tier 1		2024 Existing + Tier 1															
		Coal	NG	Nuclear	Oil	Biomass	Geo	Other	Pumped Storage	Battery	Hydro	Solar	Wind	DR	DGPV	Total	
EAST	Total	143,035	330,342	82,793	26,771	3,624	-	991	19,607	3,298	28,980	72,757	94,364	25,753	24,367	856,682	
ISONE	Total	541	15,494	3,331	5,710	818	-	233	1,571	57	1,911	3,386	2,553	661	3,713	39,979	
MISO	Total	37,914	64,194	11,127	2,867	613	-	329	4,396	1,031	2,533	29,777	41,715	7,775	3,049	207,319	
	MISO-W	12,651	13,608	2,753	1,491	244	-	2	-	200	777	7,368	29,411	2,367	741	71,612	
	MISO-C	15,050	10,307	2,169	494	32	-	152	773	499	769	10,587	7,350	2,026	1,774	51,982	
	MISO-S	5,493	31,052	5,100	589	243	-	117	49	5	845	8,024	596	2,109	291	54,511	
	MISO-E	4,720	9,227	1,105	292	94	-	57	3,574	327	143	3,799	4,359	1,273	243	29,213	
NYISO	Total	-	22,937	3,330	2,631	334	-	-	1,400	60	4,915	1,039	2,706	860	5,710	45,924	
PJM	Total	39,915	84,381	32,535	9,875	851	-	-	5,062	338	3,071	10,892	11,718	7,397	8,603	214,638	
	PJM-W	34,917	39,056	16,557	1,933	112	-	-	234	149	1,252	5,780	10,065	3,814	599	114,467	
	PJM-S	2,391	15,038	5,288	3,985	479	-	-	2,958	127	1,070	3,932	360	1,824	2,498	39,951	
	PJM-E	2,608	30,287	10,690	3,956	260	-	-	1,870	62	749	1,180	1,294	1,759	5,506	60,221	
SERC	Total	45,747	113,334	31,702	4,063	989	-	83	6,701	768	11,425	26,959	982	7,707	3,221	253,680	
	SERC-C	13,348	20,127	8,280	148	36	-	-	1,784	100	4,995	2,308	982	1,851	20	53,978	
	SERC-SE	13,275	29,866	8,018	915	424	-	-	1,548	115	3,260	7,267	-	2,069	317	67,073	
	SERC-FL	4,346	47,002	3,502	1,957	310	-	83	-	538	-	10,121	-	2,804	2,051	72,714	
	SERC-E	14,777	16,340	11,902	1,044	219	-	-	3,369	15	3,170	7,263	-	983	833	59,914	
SPP	Total	18,919	30,003	769	1,626	20	-	345	477	1,044	5,123	703	34,689	1,353	71	95,142	
	SPP-N	5,089	3,467	304	504	1	-	185	-	8	3,041	84	7,041	333	7	20,065	
	SPP-S	13,829	26,536	465	1,121	19	-	160	477	1,037	2,082	619	27,649	1,020	64	75,078	
ERCOT	Total	13,568	50,889	4,973	10	163	-	-	-	10,720	583	31,058	39,532	3,464	2,531	157,490	
	ERCOT	Total	13,568	50,889	4,973	10	163	-	-	-	10,720	583	31,058	39,532	3,464	2,531	157,490
WEST	Total	21,666	87,403	9,403	829	1,565	4,093	106	4,536	15,238	52,687	44,042	35,071	1,944	16,271	294,854	
	CAISO+	Total	1,816	37,434	5,582	185	726	2,004	35	3,514	11,156	10,211	25,614	7,773	829	10,047	116,925
		CALI-N	-	12,942	5,582	165	465	1,049	9	1,967	2,672	8,727	6,723	1,373	349	5,036	47,059
		CALI-S	1,816	24,492	-	20	261	955	26	1,547	8,484	1,483	18,891	6,400	480	5,011	69,866
	Non-CA	Total	19,850	49,969	3,820	644	839	2,089	71	1,022	4,082	42,476	18,428	27,298	1,115	6,224	177,929
	WECC	WA	560	3,919	1,096	17	352	-	-	140	350	24,402	1,052	2,690	243	386	35,207
		OR	-	3,915	-	6	293	21	-	-	482	8,253	2,145	3,440	141	372	19,068
		SOUTHWEST	4,842	17,985	2,724	323	102	1,047	-	176	2,173	1,019	5,641	3,685	168	2,452	42,335
		WASATCH	7,033	14,061	-	87	56	1,011	61	444	750	7,587	5,625	4,052	305	1,674	42,746
		FRONTR	7,415	10,089	-	211	36	10	10	262	328	1,215	3,966	13,432	258	1,340	38,572
	Total	178,268	468,635	97,169	27,610	5,353	4,093	1,096	24,144	29,256	82,249	147,856	168,966	31,161	43,169	1,309,026	

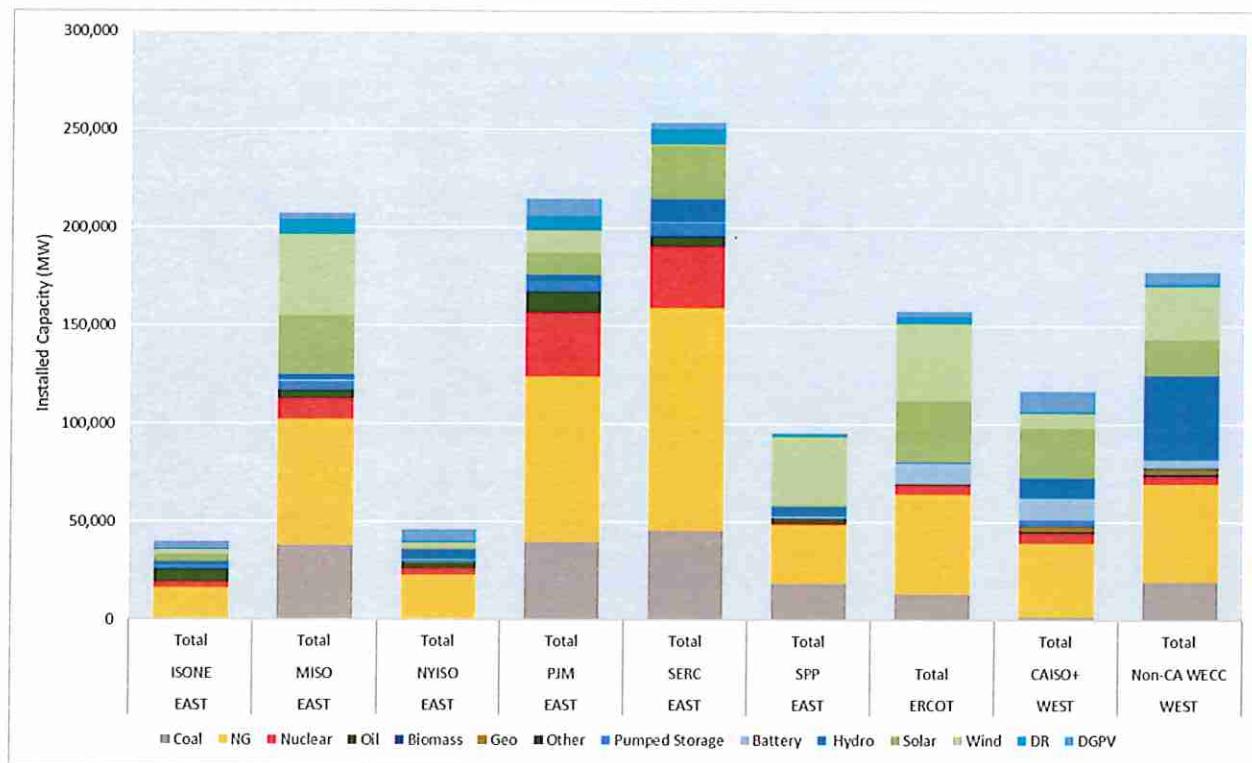


Figure A.2. Existing and Tier 1 capacities by NERC assessment area in 2024.

Forecasting 2030 Resource Mixes

To develop the 2030 ITCS generation portfolio, the study team added new capacity builds and removed planned retirements.

- (i) *Tier 1*: Assumes that only projects considered very mature in the development pipeline—such as those with signed interconnection agreements—will be built. This results in minimal capacity additions beyond 2026. The data are based on projects designated as *Tier 1* in the 2024 LTRA data for the year 2030.

Retirements

To project which units will retire by 2030, the study team primarily used the LTRA 2024 data and cross-checked it with EIA data. The assessment areas were disaggregated to ITCS zones based on the ratios of projected retirements in EIA 860 data. The three scenarios modeled are as follows:

- (i) *Announced*: Assumes that in addition to confirmed retirements, generators that have publicly announced retirement plans but have not formally notified system operators have also begun the retirement process. This is based on data from the 2024 LTRA, which were collected by the NERC team from sources like news announcements, public disclosures, etc.

- (ii) *None*: Assumes that there are no retirements between 2024 and 2030 for comparison. Delaying or canceling some near-term retirements may not be feasible, but this case can help determine how much retirements contribute to resource adequacy challenges in regions where rapid AI and data center growth is expected.

Generation Stack for Each Scenario

Finally, when summing all potential future changes, the team arrived at a generation stack for each of the various scenarios to be studied. The first figure provides a visual comparison of all the cases, which vary from 1,309 GW to 1,519 GW total generation capacity for the entire continental United States, to enable the exploration of a range of potential generation futures. The tables below provide breakdowns by ITCS region and by resource type.

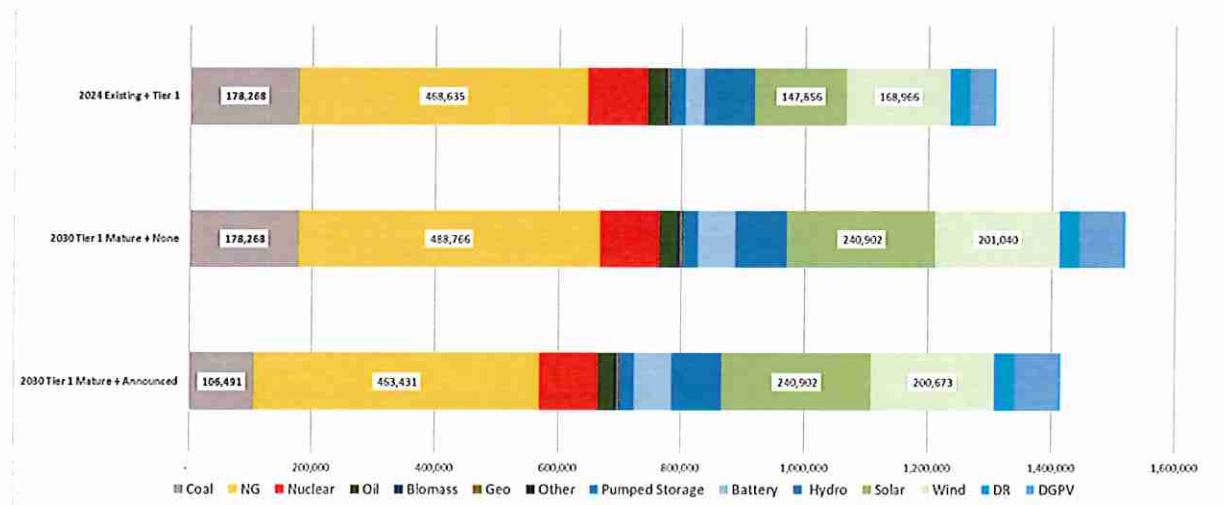


Figure A.9. Comparison of 2030 generation stacks for the various scenarios.

Table A.4. 2030 generation stack for Tier 1 mature + announced retirements.

2030 Tier 1 Mature + Announced			Coal	NG	Nuclear	Oil	Biomass	Geo	Other	Pumped Storage	Battery	Hydro	Solar	Wind	DR	DGPV	Total
EAST	Total		84,730	328,457	82,793	24,272	3,473	-	991	19,591	12,415	28,897	126,849	113,568	26,837	36,768	889,641
ISONE	Total		7	13,708	3,331	5,687	741	-	233	1,571	1,664	1,911	3,676	4,048	661	5,606	42,845
MISO	Total		13,001	60,132	11,127	2,873	473	-	329	4,380	2,960	2,450	44,132	43,369	7,775	3,049	196,049
	MISO-W		4,338	12,747	2,753	1,494	188	-	2	-	574	751	10,920	30,577	2,367	741	67,453
	MISO-C		5,161	9,655	2,169	495	25	-	152	770	1,433	743	15,690	7,642	2,026	1,774	47,735
	MISO-S		1,883	29,087	5,100	591	187	-	117	49	14	817	11,892	619	2,109	291	52,756
	MISO-E		1,619	8,643	1,105	293	72	-	57	3,561	938	138	5,630	4,531	1,273	243	28,105
NYISO	Total		-	21,907	3,330	2,628	334	-	-	1,400	60	4,915	1,159	4,608	860	9,194	50,396
PJM	Total		26,662	87,228	32,535	8,117	917	-	-	5,062	2,276	3,071	33,530	18,807	7,638	10,955	236,798
	PJM-W		23,323	40,373	16,557	1,589	120	-	-	234	1,004	1,252	17,793	16,153	3,939	762	123,100
	PJM-S		1,597	15,546	5,288	3,276	516	-	-	2,958	853	1,070	12,105	577	1,883	3,181	48,850
	PJM-E		1,742	31,309	10,690	3,252	280	-	-	1,870	419	749	3,632	2,076	1,816	7,012	64,848
SERC	Total		31,672	116,117	31,702	3,391	989	-	83	6,701	3,021	11,425	38,360	982	8,088	7,893	260,423
	SERC-C		8,883	23,777	8,280	148	36	-	-	1,784	180	4,995	3,070	982	1,851	29	54,014
	SERC-SE		10,321	28,127	8,018	899	424	-	-	1,548	618	3,260	9,024	-	2,213	317	64,768
	SERC-FL		2,851	47,092	3,502	1,477	310	-	83	-	2,208	-	16,717	-	3,022	5,865	83,127
	SERC-E		9,617	17,122	11,902	868	219	-	-	3,369	15	3,170	9,549	-	1,002	1,682	58,513
SPP	Total		13,389	29,365	769	1,576	20	-	345	477	2,434	5,123	5,991	41,755	1,815	71	103,130
	SPP-N		3,602	3,394	304	489	1	-	185	-	18	3,041	717	8,475	447	7	20,679
	SPP-S		9,787	25,971	465	1,087	19	-	160	477	2,416	2,082	5,274	33,280	1,368	64	82,451
ERCOT	Total		11,568	49,436	4,973	10	163	-	-	-	27,258	583	62,406	43,169	3,464	5,864	208,894
ERCOT	Total		11,568	49,436	4,973	10	163	-	-	-	27,258	583	62,406	43,169	3,464	5,864	208,894
WEST	Total		10,193	85,538	7,103	823	1,427	3,983	106	4,366	21,330	52,060	51,648	43,935	1,981	31,931	316,424
CAISO+	Total		16	35,789	3,282	185	726	2,059	35	3,514	14,316	10,211	27,112	7,773	866	17,055	122,938
	CAU-N		-	12,373	3,282	165	465	1,078	9	1,967	3,429	8,727	7,116	1,373	364	8,549	48,897
	CAU-S		16	23,416	-	20	261	982	26	1,547	10,887	1,483	19,996	6,400	501	8,506	74,041
Non-CA	Total		10,177	49,749	3,820	639	701	1,924	71	852	7,014	41,849	24,536	36,162	1,115	14,876	193,485
WECC	WA		243	3,971	1,096	16	286	-	-	111	459	24,033	1,404	3,631	243	1,092	36,588
	OR		-	3,967	-	6	238	18	-	-	632	8,128	2,865	4,644	141	1,051	21,689
	SOUTHWEST		3,657	17,343	2,724	323	102	1,047	-	176	4,511	1,019	7,460	4,284	168	4,211	47,022
	WASATCH		3,055	14,247	-	86	45	850	61	355	983	7,472	7,512	5,470	305	4,733	45,175
	FRONT R		3,221	10,222	-	208	30	8	10	209	430	1,197	5,296	18,133	258	3,789	43,011
	Total		106,491	463,431	94,869	25,106	5,063	3,983	1,096	23,958	61,003	81,539	240,902	200,673	32,282	74,563	1,414,959

Table A.5. 2030 generation stack for Tier 1 mature + no retirements.

2030 Tier 1 Mature + No Retirements		Coal	NG	Nuclear	Oil	Biomass	Geo	Other	Pumped Storage	Battery	Hydro	Solar	Wind	DR	DGPV	Total	
EAST	Total	143,035	345,459	82,793	27,336	3,701	-	991	19,607	12,415	28,980	126,849	113,840	26,837	36,768	968,610	
	ISONE Total	541	15,584	3,331	5,891	818	-	233	1,571	1,664	1,911	3,676	4,048	661	5,606	45,534	
	MISO Total	37,914	66,729	11,127	3,197	613	-	329	4,396	2,960	2,533	44,132	43,641	7,775	3,049	228,393	
	MISO-W	12,651	14,145	2,753	1,662	244	-	2	-	574	777	10,920	30,768	2,367	741	77,605	
	MISO-C	15,050	10,714	2,169	551	32	-	152	773	1,433	769	15,690	7,690	2,026	1,774	58,823	
	MISO-S	5,493	32,278	5,100	657	243	-	117	49	14	845	11,892	623	2,109	291	59,710	
	MISO-E	4,720	9,592	1,105	326	94	-	57	3,574	938	143	5,630	4,560	1,273	243	32,255	
	NYISO Total	-	22,937	3,330	2,646	334	-	-	1,400	60	4,915	1,159	4,608	860	9,194	51,444	
	PJM Total	39,915	88,880	32,535	9,907	928	-	-	5,062	2,276	3,071	33,530	18,807	7,638	10,955	253,504	
	PJM-W	34,917	41,138	16,557	1,939	122	-	-	234	1,004	1,252	17,793	16,153	3,939	762	135,810	
	PJM-S	2,391	15,840	5,288	3,998	522	-	-	2,958	853	1,070	12,105	577	1,883	3,181	50,667	
	PJM-E	2,608	31,902	10,690	3,969	284	-	-	1,870	419	749	3,632	2,076	1,816	7,012	67,027	
	SERC Total	45,747	120,232	31,702	4,063	989	-	83	6,701	3,021	11,425	38,360	982	8,088	7,893	279,285	
	SERC-C	13,348	24,958	8,280	148	36	-	-	1,784	180	4,995	3,070	982	1,851	29	59,660	
	SERC-SE	13,275	29,866	8,018	915	424	-	-	1,548	618	3,260	9,024	-	2,213	317	69,478	
	SERC-FL	4,346	48,163	3,502	1,957	310	-	83	-	2,208	-	16,717	-	3,022	5,865	86,173	
	SERC-E	14,777	17,246	11,902	1,044	219	-	-	3,369	15	3,170	9,549	-	1,002	1,682	63,973	
	SPP Total	18,919	31,098	769	1,632	20	-	345	477	2,434	5,123	5,991	41,755	1,815	71	110,449	
	SPP-N	5,089	3,594	304	506	1	-	185	-	18	3,041	717	8,475	447	7	22,385	
	SPP-S	13,829	27,504	465	1,126	19	-	160	477	2,416	2,082	5,274	33,280	1,368	64	88,064	
ERCOT	Total	13,568	51,458	4,973	10	163	-	-	-	27,258	583	62,406	43,169	3,464	5,864	212,916	
ERCOT	Total	13,568	51,458	4,973	10	163	-	-	-	27,258	583	62,406	43,169	3,464	5,864	212,916	
WEST	Total	21,666	91,849	9,403	829	1,565	4,156	106	4,536	21,330	52,687	51,648	44,030	1,981	31,931	337,717	
	CAISO+	Total	1,816	39,560	5,582	185	726	2,059	35	3,514	14,316	10,211	27,112	7,773	866	17,055	130,809
	CAU-N	-	13,677	5,582	165	465	1,078	9	1,967	3,429	8,727	7,116	1,373	364	8,549	52,501	
	CAU-S	1,816	25,883	-	20	261	982	26	1,547	10,887	1,483	19,996	6,400	501	8,506	78,308	
	Non-CA	Total	19,850	52,289	3,820	645	839	2,097	71	1,022	7,014	42,476	24,536	36,257	1,115	14,876	206,908
	WECC	WA	560	4,166	1,096	17	352	-	-	140	459	24,402	1,404	3,642	243	1,092	37,573
		OR	-	4,161	-	6	293	22	-	-	632	8,253	2,865	4,658	141	1,051	22,081
		SOUTHWEST	4,842	18,294	2,724	323	102	1,047	-	176	4,511	1,019	7,460	4,284	168	4,211	49,158
		WASATCH	7,033	14,945	-	88	56	1,018	61	444	983	7,587	7,512	5,486	305	4,733	50,251
		FRONT R	7,415	10,723	-	212	36	10	10	262	430	1,215	5,296	18,187	258	3,789	47,844
	Total	178,268	488,766	97,169	28,175	5,429	4,156	1,096	24,144	61,003	82,249	240,802	201,040	32,282	74,563	1,519,243	

Appendix B - Representing Canadian Transfer Limits

Introduction

The reliability and stability of cross-border electricity interconnections between the United States and Canada are critical to ensuring continuous power delivery amid evolving demands and variable supply conditions. In recent years, increased integration of wind and solar generation, coupled with extreme weather events, has introduced significant uncertainties in regional power flows.

This report describes the development and implementation of a machine learning (ML)-based model designed to project the maximum daily energy transfer (MaxFlow) across major United States–Canada interfaces, such as BPA–BC Hydro and NYISO–Ontario. Leveraging 15 years of high-resolution load and generation data, summarizing it into key daily statistics, and training a robust eXtreme Gradient Boosting (XGBoost) regressor can allow data-driven predictions to be captured with quantified uncertainty.

The project team provided percentile-based forecasts—25, 50, and 75 percent—to support both conservative and strategic planning. The conservative methodology (25 percent) was used for this report to ensure availability when needed.

The subsequent sections detail the methodology used for data processing and feature engineering, the architecture and training of the predictive model, and the validation metrics and feature importance analyses used. Future enhancements could include incorporating weather patterns, neighboring-region dynamics, and fuel-specific generation profiles to further strengthen predictive performance and support grid resilience.

Methodology

This section describes the ML approach used to build the MaxFlow prediction model.

Dataset Collection and Preparation

Data were collected for hourly and derived daily load and generation over a 15-year period (2010–2024), comprising 8,760 hourly observations annually. Hourly interconnection flow rates were collected for the same years across all major United States–Canada interfaces.^{1–17}

Underlying Hypothesis

The team hypothesized that the MaxFlow between interconnected regions is critically influenced by regional load and generation extrema (maximum and minimum) and their variability. These statistics reflect grid stress conditions, influencing interregional energy flow. Additionally, nonlinear interactions due to imbalances in adjacent regions further affect energy transfer dynamics.

Regression Model

The XGBoost regression model was chosen because of its ability to capture complex, nonlinear relationships, regularization capability to prevent overfitting, high speed and performance, fast convergence, built-in handling of missing data, and ease of confidence interval approximation.

XGBoost builds many small decision trees, one after another. Each new tree learns to correct the mistakes of the previous ensemble by focusing on which predictions had the greatest error. Instead of creating one large, complex tree, it combines many simpler trees—each making a modest adjustment—so that, together, they capture nonlinear patterns and interactions. Regularization (penalties for tree size and leaf adjustments) prevents overfitting, and a “learning rate” scales each tree’s contribution so that improvements are made gradually. The final prediction is simply the sum of all those small corrections.

Model Training, Validation, and Assessment

Figure B.1 shows the data analysis and prediction process, which ties together seven stages—from raw CSV loading through outlier filtering, feature engineering, projecting to 2030, rebuilding 2030 features, training an XGBoost model, and finally making and evaluating the 2030 flow forecasts with quantiles. Each stage feeds into the next, ensuring that the features used for training mirror exactly those that will be available for future (2030) predictions.

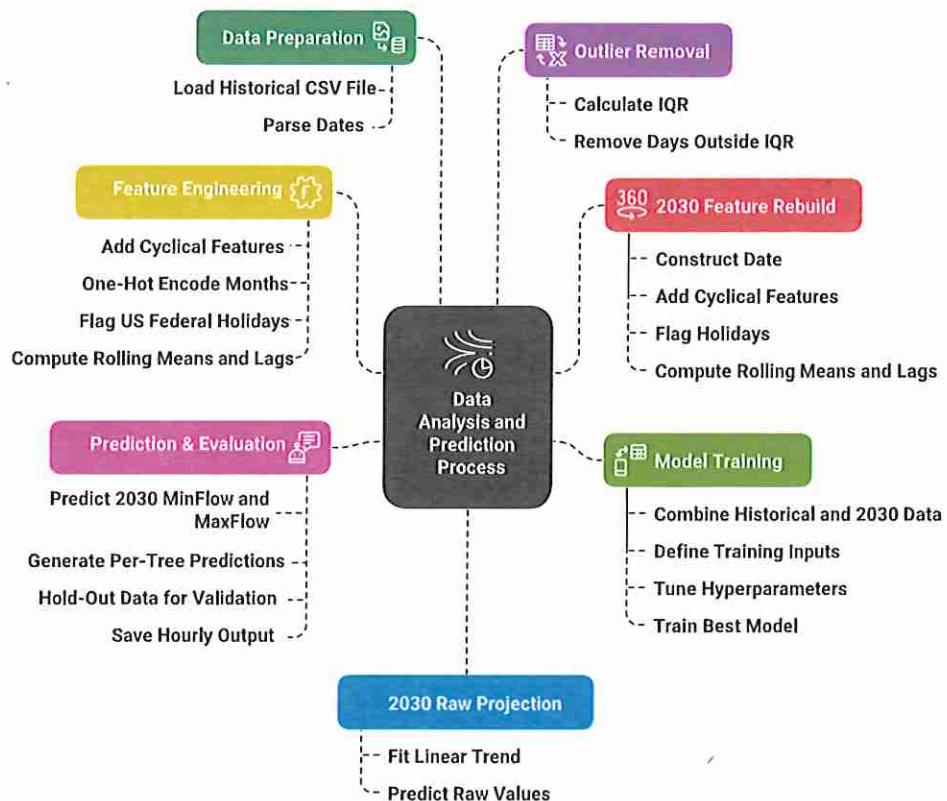


Figure B.1. Data analysis and prediction process.

Example Feature Importance for Predicting MaxFlow from Ontario to NYISO

The trained ML/XGBoost model can be used for predicting the desired year’s MaxFlow. In addition, feature importance analysis can be added to assess the contribution of each variable.

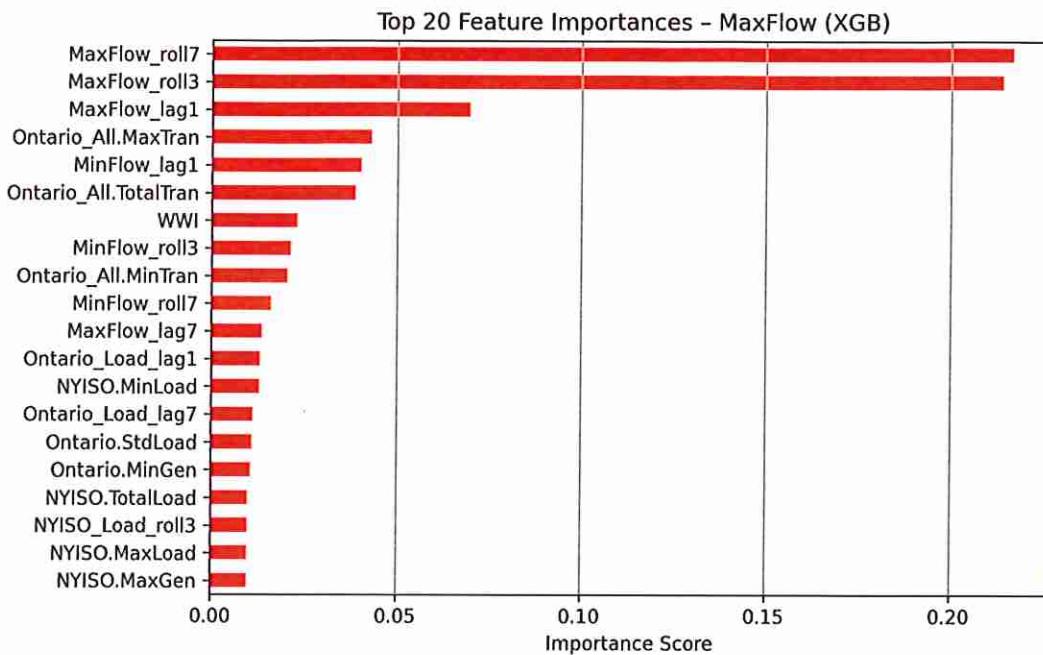


Figure B.2. Feature importance for predicting the hourly maximum energy transfer (MaxFlow) between NYISO and Ontario. XGB = eXtreme Gradient Boosting.

The feature importance plot shows that MaxFlow rolling/lagging features and Ontario_All.MaxTran are the dominant predictors of MaxFlow, meaning temporal patterns and Ontario's peak transfer capacity strongly influence interregional flow limits. Weather-related variables (WWI, e.g., temperature, humidity, etc.) and Ontario_All.TotalTran also rank highly. The 2030 MaxFlow prediction plot shows seasonal fluctuations, with higher values early and late in the year. The red shaded area represents a 95 percent confidence interval for the predictions.

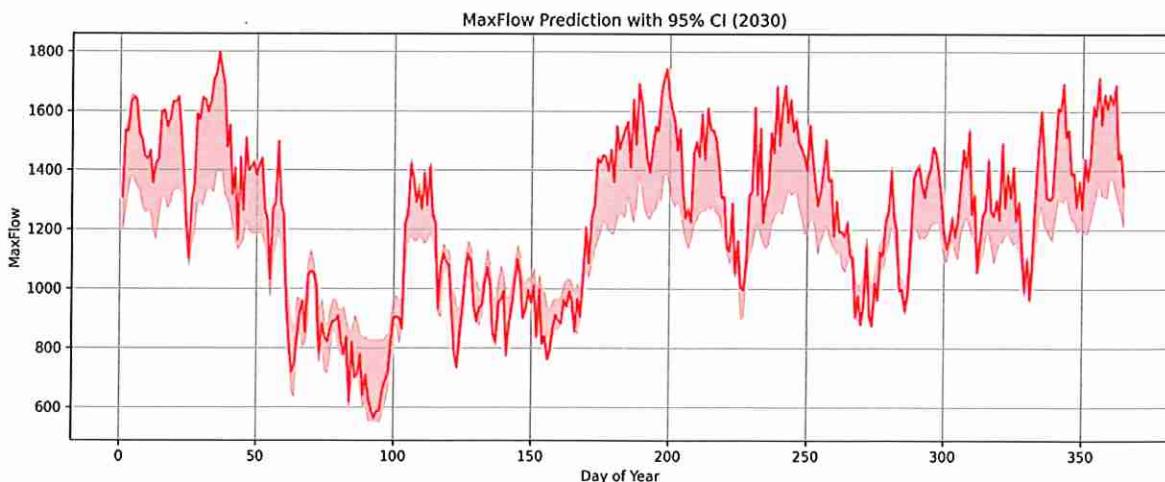


Figure B.3. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI).

Model Performance

Validating model performance on unseen data is essential to ensure the model's reliability and generalizability. The following evaluation examines how well the XGBoost model predicts minimum energy transfer (MinFlow) and MaxFlow on the validation split, highlighting strengths and areas for improvement.

Rigorous performance evaluation is a fundamental step in any ML workflow. From quantifying error metrics (root mean square error and mean absolute error) and goodness-of-fit (R^2) on both training and validation splits, it is possible to identify overfitting, assess generalization, and guide model refinement. Table B.1 shows XGBoost model performance for the Ontario–NYISO transfer limit.

Table B.1. eXtreme Gradient Boosting model performance for the Ontario–NYISO transfer limit.

Metric	Value	Explanation
MinFlow RMSE (Train)	69.2528	Root mean square error (RMSE) on training data for minimum energy transfer (MinFlow)
MinFlow R^2 (Train)	0.9651	R^2 on training data for MinFlow (higher \rightarrow better fit)
MinFlow RMSE (Validation)	163.6642	RMSE on held-out data for MinFlow
MinFlow R^2 (Validation)	0.8073	R^2 on held-out data for MinFlow (higher \rightarrow better generalization)
MaxFlow RMSE (Train)	114.4234	RMSE on training data for maximum energy transfer (MaxFlow)
MaxFlow R^2 (Train)	0.8838	R^2 on training data for MaxFlow (higher \rightarrow better fit)
MaxFlow RMSE (Validation)	144.9614	RMSE on held-out data for MaxFlow
MaxFlow R^2 (Validation)	0.8178	R^2 on held-out data for MaxFlow (higher \rightarrow better generalization)

Overall, the XGBoost model delivers excellent in-sample as well as out-of-sample accuracy. Similar outputs are available for each transfer limit.

Maximum flow predictions: Ontario to New York

Ontario and NYISO are connected through multiple high-voltage interconnections, which collectively provide a total transfer capability of up to 2,500 MW, subject to individual tie-line limits. Table B.2 outlines the data sources, preparation process, and assumptions used in creating datasets for the prediction models.

Table B.2. Ontario to New York transmission flow data and assumptions overview.

Description	
Data source	https://www.ieso.ca/power-data/data-directory
Data preparation	IESO public hourly inter-tie schedule flow data can be accessed for the years spanning from 2002 to 2023.
Assumptions	Positive flow indicates that Ontario is exporting to NY, and negative flow indicates that Ontario is importing from NY.

Figure B.4 illustrates the historical monthly MaxFlow for Ontario from 2007 through 2024, alongside 2030 projected quartile scenarios (Q1, Q2, and Q3). Analyzing these trends helps assess future reliability and facilitates capacity planning under varying conditions.

Historical monthly peaks (2007–2023) reveal a clear seasonal cycle for ONT–NYISO transfers: flows typically increase in late winter/early spring (February–April) and again in late fall/early winter (November–December). Over 16 years, the average spring peaks hovered around 1,700–1,900 MW, with occasional spikes above 2,200 MW. The 2030 forecast for Q1, Q2, and Q3 aligns with this pattern, predicting a springtime peak near 1,800 MW, a summer trough around 1,400 MW, and a modest late-summer uptick near 1,500 MW.

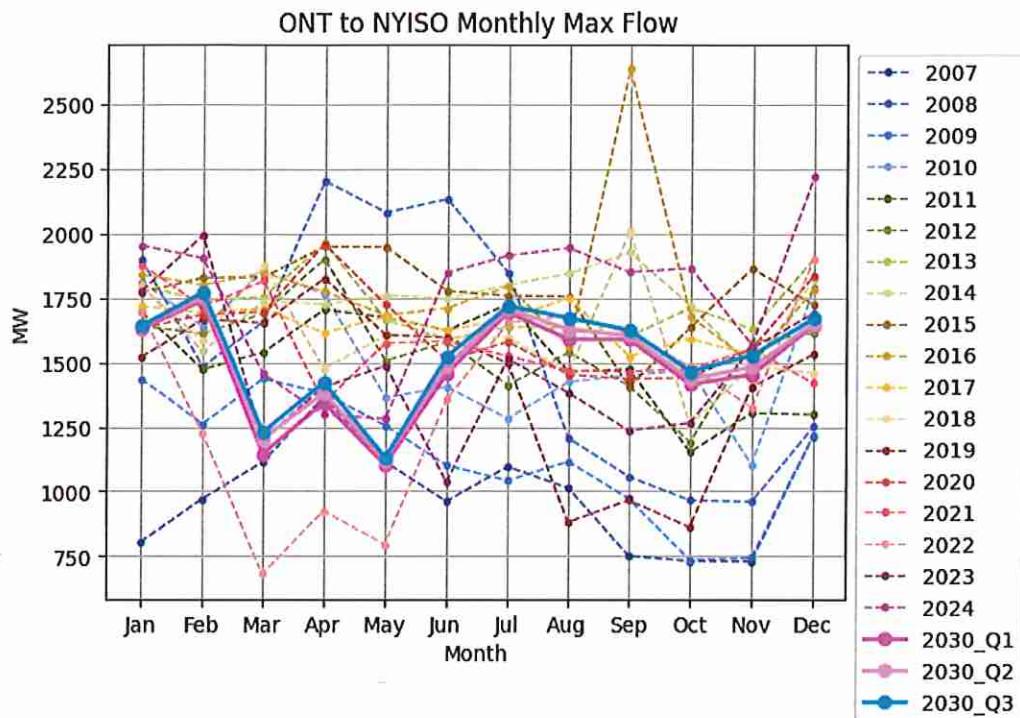


Figure B.4. Monthly maximum energy transfer between Ontario (ONT) and New York (NYISO).

The team used robust validation metrics to justify these results. When trained on daily data from the 2010–2024 period—incorporating projected 2030 loads, seasonal flags, and holiday effects—the XGBoost model achieved $R^2 > 0.80$ and a root mean square error below 150 MW on an unseen 20 percent hold-out dataset. Moreover, the 95 percent confidence intervals for monthly maxima were narrow (approximately ± 150 MW), demonstrating low predictive uncertainty. A comparison of predicted maxima with historical extremes revealed that 2030 forecasts consistently fell within (or slightly above) the previous window of variability, implying realistic demand-driven behavior. In summary, the close alignment with historical peaks, strong cross-validated performance, and tight confidence bands collectively validate the results.

Discussion

The reason that the team used ML/XGBoost to approximate the 2030 transfer profiles was to ensure that there would be no violations or inconsistencies between transfer limits, load, and generation. The 15 years of data used were sufficient for having the models learn historical relationships and project them forward to 2030 to capture the underlying trends in load,

generation, and their interactions. The use of such an extensive dataset justifies using ML to establish consistent transfer profiles.

However, in some regions, like Ontario to NYISO, the available data encompassed a shorter time period, and the relationships were only partially captured because of a lack of neighboring-region data. In such cases, it was necessary to incorporate additional predictors, such as rolling and lag features from the transfer limits. Although the direct use of transfer limit data to project future transfer limits would typically be avoided, these engineered features help improve predictions when data coverage is sparse and the model's goodness-of-fit is low.

In all cases, the ML models ensured that these historical relationships were not violated, maintaining internal consistency among load, generation, and transfer limits. Overall, the team relied on ML when long-term data were available for training and projecting load and generation profiles. Rolling and lag features were used to reinforce the model when data availability was limited, but always with the goal of upholding consistent physical relationships in the 2030 projections.

Supplementary Plots for Additional Transfers

This section presents figures and tables showing results and source data information for each transfer listed below:

- (iii) Pacific Northwest to British Columbia
- (iv) Alberta to Montana
- (v) Manitoba to MISO West
- (vi) Ontario to MISO West
- (vii) Ontario to MISO East
- (viii) Ontario to New York
- (ix) Hydro-Quebec to New York
- (x) Hydro-Quebec to New England
- (xi) New Brunswick to New England

The figures show the daily MaxFlow for each transfer that was considered in this analysis.

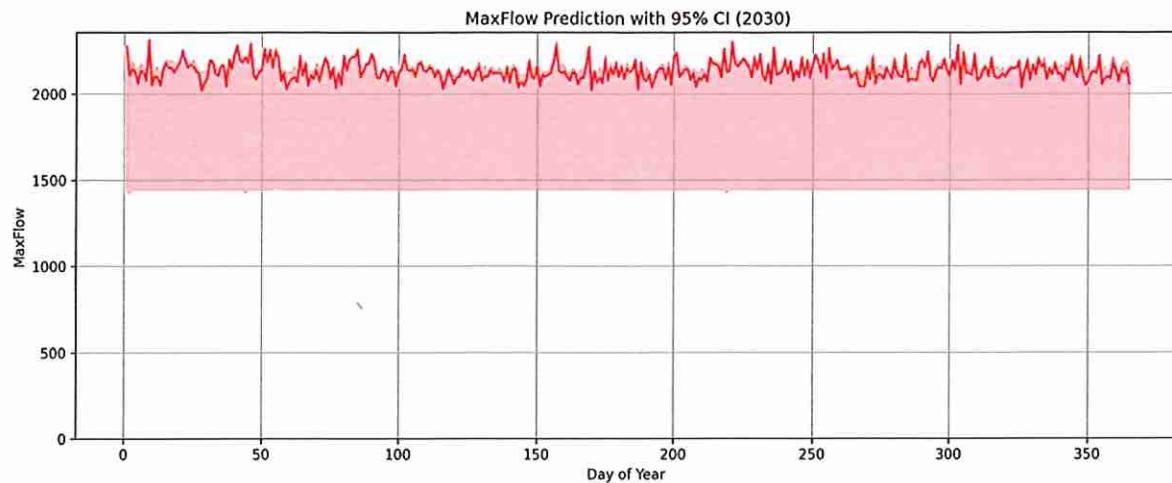


Figure B.5. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between British Columbia and the Pacific Northwest.

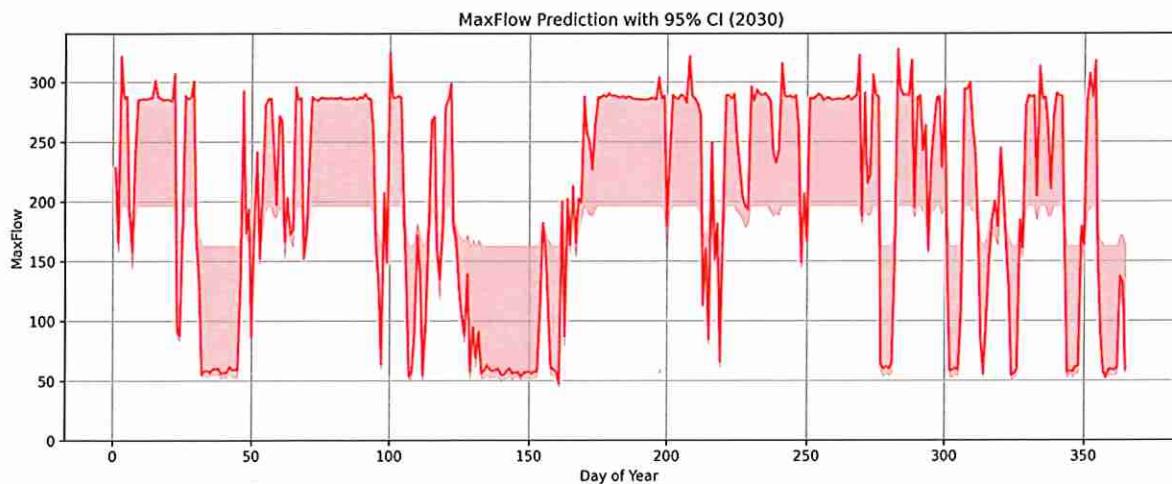


Figure B.6. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between AESO and Montana.

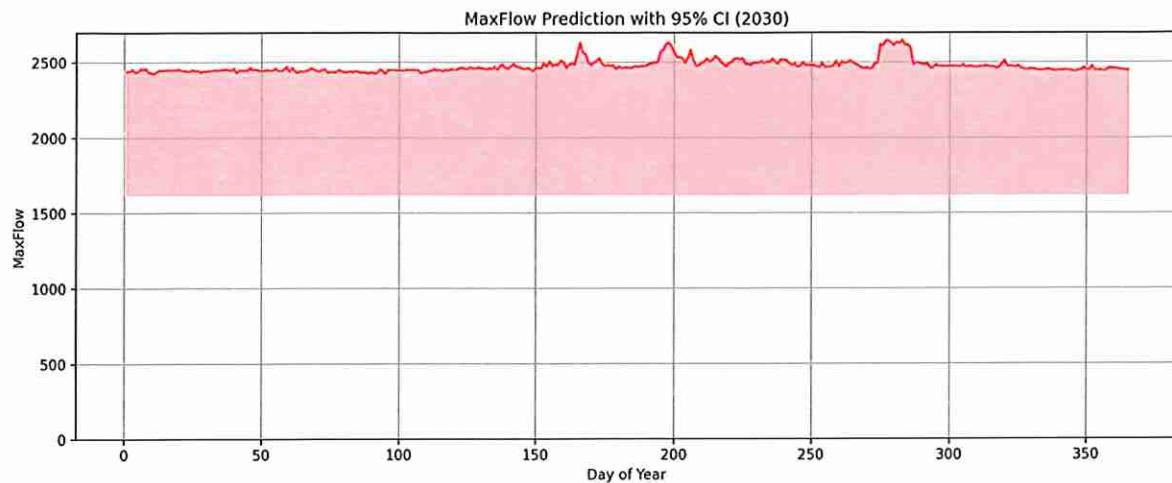


Figure B.7. Projected 2030 maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between Manitoba and MISO.

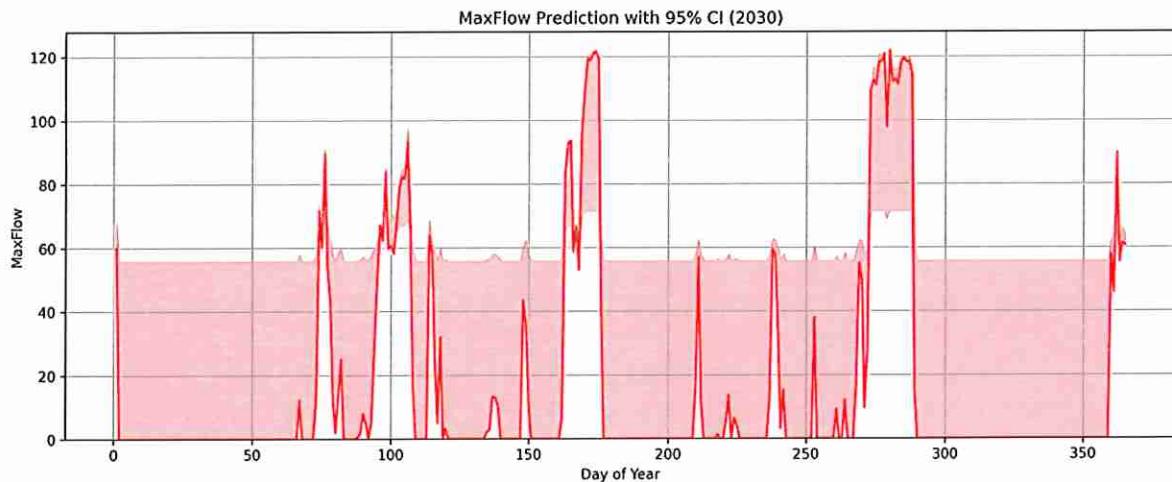


Figure B.8. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between Ontario and MISO West.

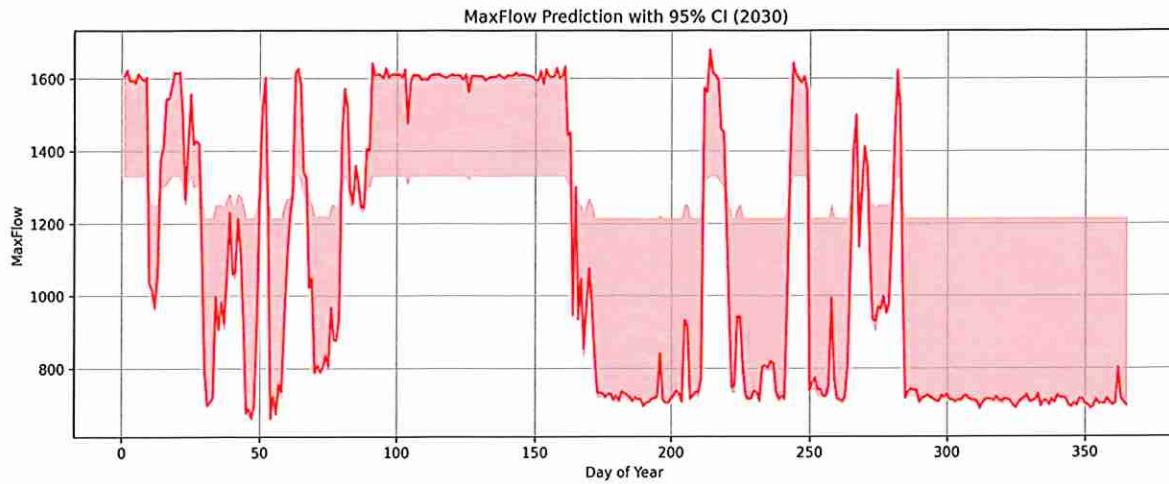


Figure B.9. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between Ontario and MISO East.

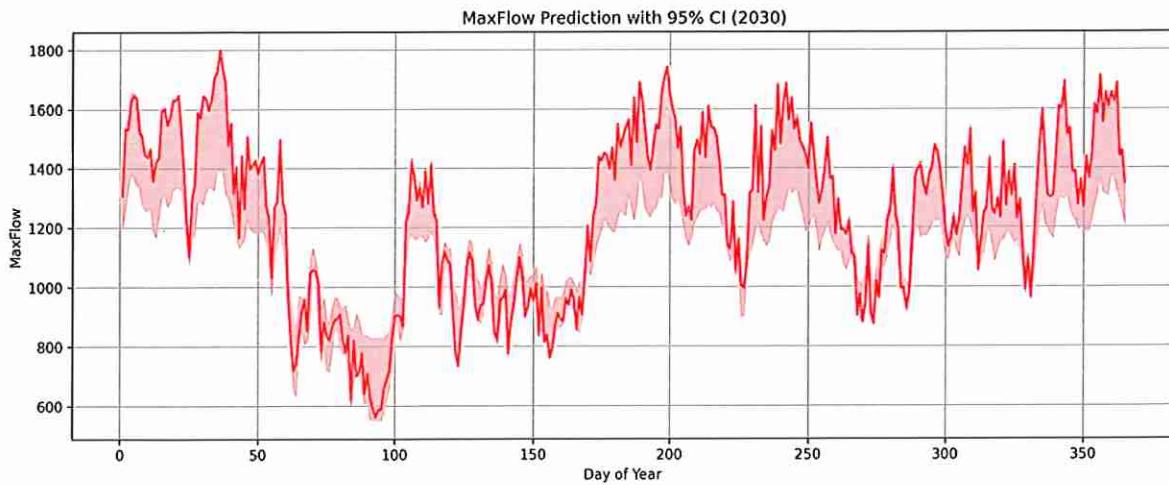


Figure B.10. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between Ontario and New York.

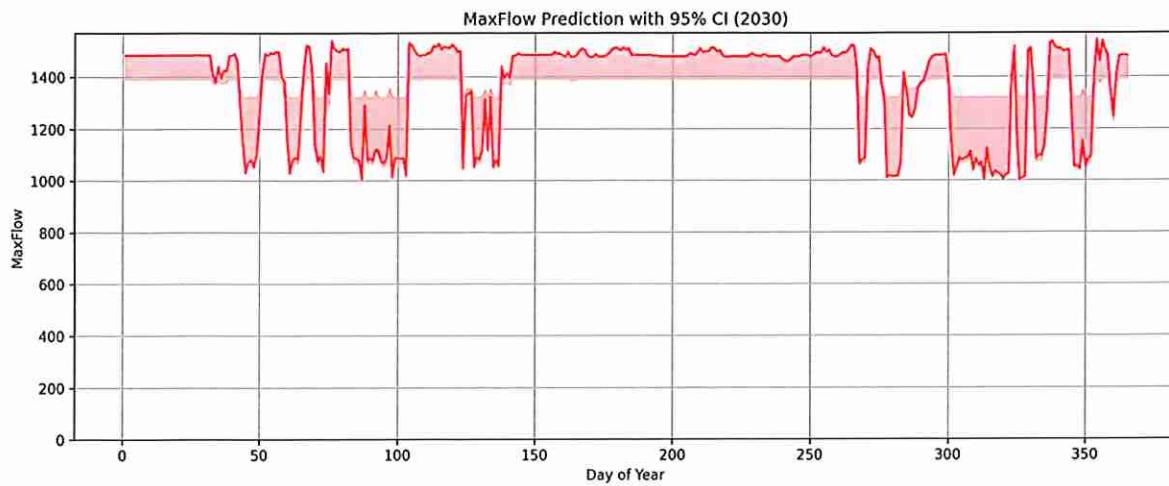


Figure B.11. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between Quebec and New York.

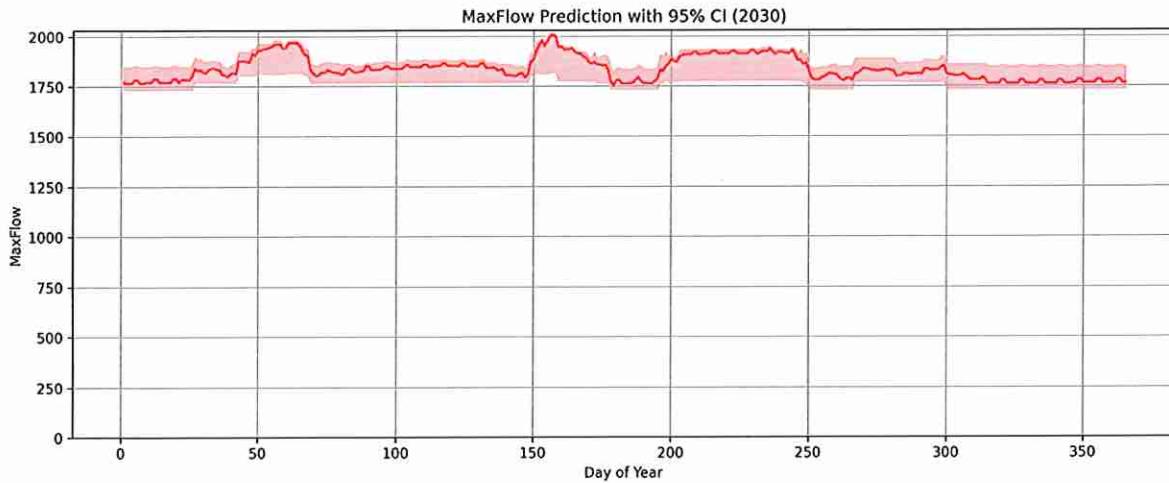


Figure B.12. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between Quebec and New England.

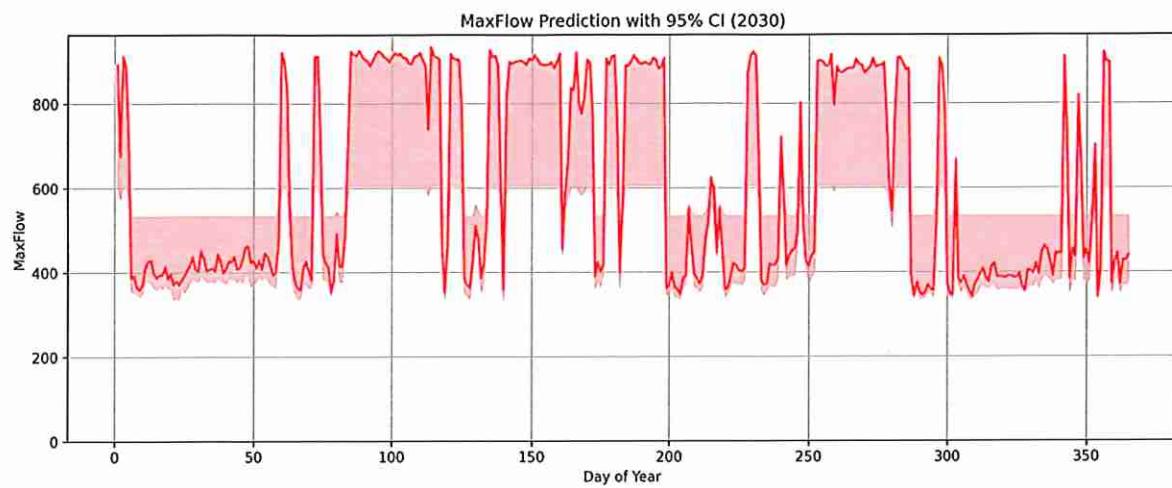


Figure B.13. Projected 2030 daily maximum energy transfer (MaxFlow) with 95 percent confidence interval (CI) between New Brunswick and New England.

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EO 14262



Presidential Documents

Executive Order 14262 of April 8, 2025

Strengthening the Reliability and Security of the United States Electric Grid

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered:

Section 1. Purpose. 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 an increase in domestic manufacturing. This increase in demand, coupled with existing capacity challenges, places a significant strain on our Nation's electric grid. Lack of reliability in the electric grid puts the national and economic security of the American people at risk. The United States' ability to remain at the forefront of technological innovation depends on a reliable supply of energy from all available electric generation sources and the integrity of our Nation's electric grid.

Sec. 2. Policy. It is the policy of the United States to ensure the reliability, resilience, and security of the electric power grid. It is further the policy of the United States that in order to ensure adequate and reliable electric generation in America, to meet growing electricity demand, and to address the national emergency declared pursuant to Executive Order 14156 of January 20, 2025 (Declaring a National Energy Emergency), our electric grid must utilize all available power generation resources, particularly those secure, redundant fuel supplies that are capable of extended operations.

Sec. 3. Addressing Energy Reliability and Security with Emergency Authority. (a) To safeguard the reliability and security of the United States' electric grid during periods when the relevant grid operator forecasts a temporary interruption of electricity supply is necessary to prevent a complete grid failure, the Secretary of Energy, in consultation with such executive department and agency heads as the Secretary of Energy deems appropriate, shall, to the maximum extent permitted by law, streamline, systemize, and expedite the Department of Energy's processes for issuing orders under section 202(c) of the Federal Power Act during the periods of grid operations described above, including the review and approval of applications by electric generation resources seeking to operate at maximum capacity.

(b) Within 30 days of the date of this order, the Secretary of Energy shall develop a uniform methodology for analyzing current and anticipated reserve margins for all regions of the bulk power system regulated by the Federal Energy Regulatory Commission and shall utilize this methodology to identify current and anticipated regions with reserve margins below acceptable thresholds as identified by the Secretary of Energy. This methodology shall:

- (i) analyze sufficiently varied grid conditions and operating scenarios based on historic events to adequately inform the methodology;
- (ii) accredit generation resources in such conditions and scenarios based on historical performance of each specific generation resource type in the real time conditions and operating scenarios of each grid scenario; and
- (iii) be published, along with any analysis it produces, on the Department of Energy's website within 90 days of the date of this order.

(c) The Secretary of Energy shall establish a process by which the methodology described in subsection (b) of this section, and any analysis and results it produces, are assessed on a regular basis, and a protocol to identify which generation resources within a region are critical to system reliability. This protocol shall additionally:

(i) include all mechanisms available under applicable law, including section 202(c) of the Federal Power Act, to ensure any generation resource identified as critical within an at-risk region is appropriately retained as an available generation resource within the at-risk region; and

(ii) prevent, as the Secretary of Energy deems appropriate and consistent with applicable law, including section 202 of the Federal Power Act, an identified generation resource in excess of 50 megawatts of nameplate capacity from leaving the bulk-power system or converting the source of fuel of such generation resource if such conversion would result in a net reduction in accredited generating capacity, as determined by the reserve margin methodology developed under subsection (b) of this section.

Sec. 4. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.



THE WHITE HOUSE,
April 8, 2025.

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**U.S. DEPARTMENT
of ENERGY**

For more information, visit:
energy.gov/topics/reliability

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