

Industrial Energy Consumers of America

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Six EPA rules will cause more coal retirements unless overturned in court, rejected by Congress, or withdrawn and rewritten by a new President

- **Carbon Rule** **Being litigated**
- **Mercury and Air Toxics Standards** **Being litigated**
- **Effluent Limitations Guidelines** **Being litigated**
- **Ozone Transport Rule** **Being litigated; stayed by SCOTUS**
- **Coal Combustion Residuals** **Being implemented**
- **Regional Haze** **Being implemented**

PJM, MISO, SPP and ERCOT oppose harmful carbon rule

The four grid operators “... request that the Court remand the Final Rule back to EPA, with instructions for it to adequately consider the ... grid adequacy and reliability issues [grid operators] previously raised”

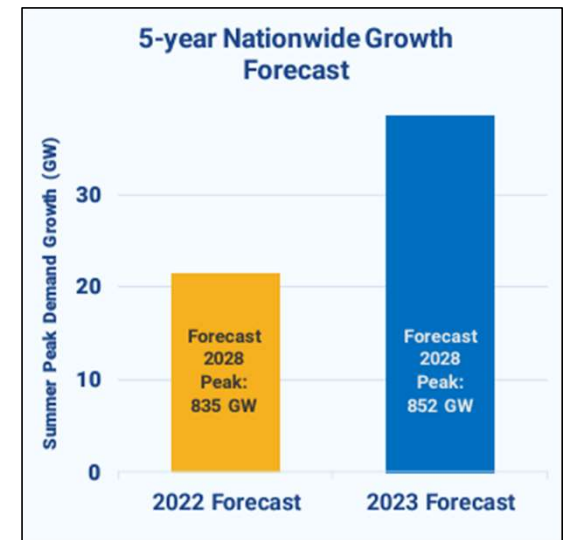
“The Joint ISOs/RTOs are concerned that premature retirements of generating units that provide critical reliability attributes can have significant, negative consequences on reliability.”

The four grid operators “... are also concerned about the chilling impact these collective rules will have on the investment required to retain and maintain existing units that are needed to provide key reliability attributes and grid services before the Final Rule’s compliance date.”

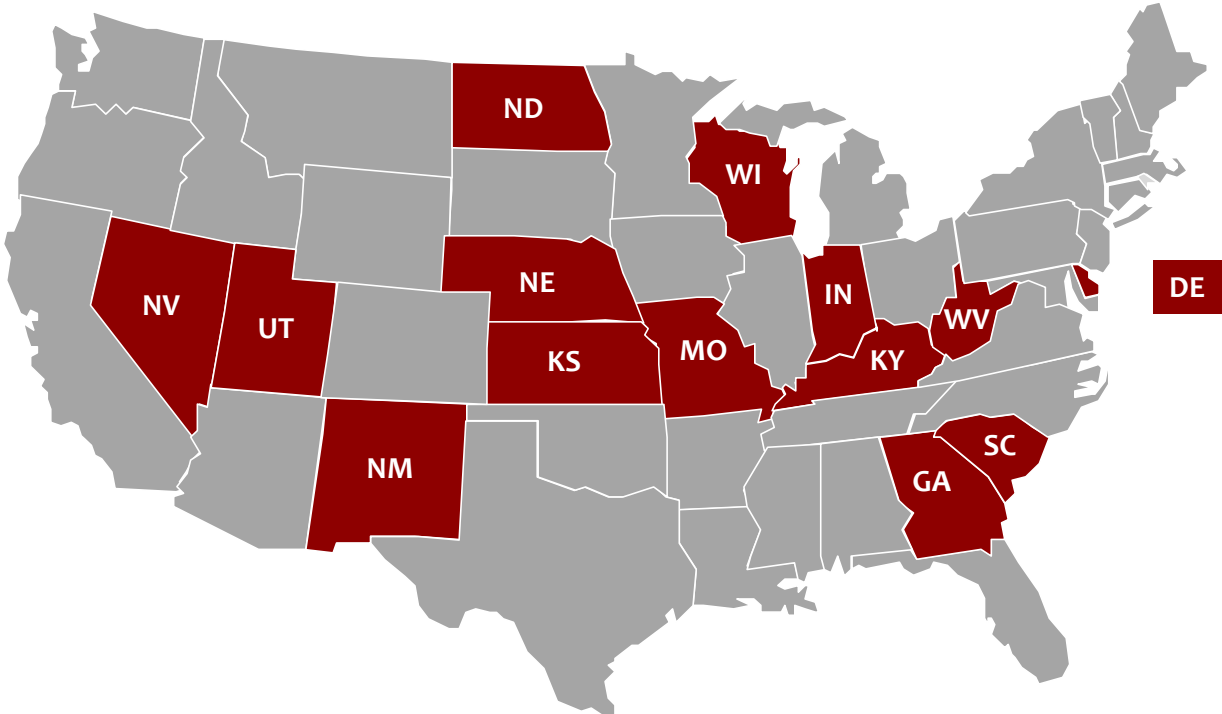
“In the Final Rule, EPA did not adequately consider or address potential impacts of the Rule on wholesale electricity markets or generation owners’ decisions to continue or cease operations.”

Electricity demand is increasing dramatically

- Electricity demand had been flat for more than a decade.
- The nationwide 5-year forecast of electricity demand growth has almost doubled because of data centers, EVs, new manufacturing facilities, etc.
- The grid is not prepared for huge increases in electricity demand.
- One independent analysis says that at least 38,000 MW of new electric generating capacity is needed through 2028, although this figure is probably low.
- NERC estimates that 91,000 MW of new capacity will be needed because of load growth.



Utilities in 14 states (red) have reversed or delayed over 14,000 MW of coal retirements because of reliability concerns or load growth



Five measures to avoid a reliability crisis

- 1. Dispatchable generating capacity should not retire until replacement capacity is in operation.**
- 2. The replacement capacity should have at least the same accredited capacity and other reliability attributes as the retiring capacity.**
- 3. Any electric transmission that is needed because of the replacement capacity should be built, not simply planned or under construction. (Also, the cost of any new transmission should be considered in deciding whether it is economical to retire existing capacity.)**
- 4. Grid operators should identify and value all attributes that are necessary to maintain grid reliability.**
- 5. EPA should design its rules to ensure they will not undermine reliability.**

A blurred photograph of a city skyline at night, with various lights from buildings and streets creating a bokeh effect against a dark blue background.

DEPENDABLE POWER **FIRST**

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