

Public Statement of Michelle Bloodworth
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I am Michelle Bloodworth, president and CEO of America's Power. First, I want to thank the Board of Directors, MISO, and stakeholders for the opportunity to speak today and for an informative and productive board week.

America's Power is the only national trade organization whose sole mission is to advocate at the federal and state levels on behalf of coal-fired electricity and the supply chain that supports the coal fleet. Our membership includes electricity generators, coal producers, barge operators, and equipment manufacturers. We believe the coal fleet and its supply chain are essential to maintaining grid reliability for the foreseeable future.

There have been numerous warnings about a pending grid reliability crisis. One of the primary reasons is the premature retirement of dispatchable electricity resources, mostly coal. Despite these clear warnings which began several years ago, an alarming number of coal-fired power plants continue to retire, and the pace of these retirements is faster than most people realize. Between 2024 and 2028 (over the next five years), utilities within MISO's footprint have announced plans to retire almost 19,000 MW of coal-fired generation which represents 40% of the existing MISO coal fleet. MISO's neighbor PJM faces a similar trend with more than 13,000 MW of coal expected to retire over the same period. As you know, coal retirements are almost certain to increase even more because of rules that EPA will be finalizing within the coming weeks, especially the Carbon Rule which will be challenged in the courts after it has been finalized. We believe the proposed Carbon Rule puts as much as 100,000 MW of coal at risk of retiring prematurely. According to press reports, EPA is considering changes to the rule that will speed up the retirement of coal plants even more. I would like to commend MISO and other grid operators for speaking out about the flaws with the proposed rule and expressing their concerns about the impact of the proposed rule on retirements and reliability.

In addition, according to a new report from Grid Strategies, over the past year grid planners nearly doubled the 5-year load growth forecast and are projecting a peak demand increase of 38,000 MW through 2028. The report also states that the U.S. electric grid is not prepared for significant load growth from new data centers/AI and EVs. More than 60% of data centers are expected to locate in MISO, CAISO, PJM, and

the Southeast by 2027. However, MISO does not appear to have included substantial data center growth in its forecast, according to Grid Strategies.

MISO recently released “MISO’s Response to the Reliability Imperative,” which is updated on a periodic basis to reflect changing conditions in the region.

We commend MISO for this sober warning which explains the serious problems the grid operator faces in maintaining a reliable supply of electricity. Because of the large amount of dispatchable generation that is expected to retire within the next 5 years, we suggest that MISO focus considerable attention on the near-term in its Futures scenarios.

We have been urging decisionmakers to take 5 simple steps before dependable electricity sources such as coal are allowed to retire: 1) The replacement source of electricity should be built and in operation. This would prevent capacity gaps that could lead to electricity shortages. 2) The replacement source of electricity should have at least the same accredited capacity and other reliability attributes as the retiring capacity. This would maintain resource adequacy and grid reliability. 3) Additional transmission that is needed to accommodate the replacement capacity (mostly solar and wind facilities) should be connected to the grid, not merely lined up in an interconnection queue or under construction. The cost of new transmission should be considered in deciding whether to retire existing capacity. 4) Grid operators should identify and value all attributes that are necessary to maintain grid reliability. And 5) EPA rules should be designed so they do not cause reliability problems. EPA should work with grid experts to conduct careful reliability analysis. These 5 steps would help prevent the reliability problems that MISO and others are warning us about.

We support the urgency of MISO’s continued work on accreditation reforms and encourage them to continue developing reforms that value critical reliability attributes.