

Submitted via email to NeedsStudy.Comments@hq.doe.gov

DATE: September 8, 2026

TO: U.S. Department of Energy Office of Electricity

SUBJECT: Comments on Transmission Needs Study

America's Power appreciates the opportunity to provide brief comments on the draft *2026 National Transmission Needs Study* which was developed by DOE pursuant to section 216(a)(1) of the Federal Power Act.¹ The purpose of the draft study is "to identify transmission needs currently harming consumers or expected to do so in the future and that could be alleviated by transmission solutions." The draft provides very useful information to inform future transmission planning and is especially timely given the significant challenges created by a rapidly changing mix of grid resources, including the retirement of coal and other conventional resources; unprecedented demand growth; aging infrastructure; and increasing concerns about energy affordability.

Because America's Power advocates for the coal fleet and its supply chain, we do not typically engage regarding strictly electric transmission issues. However, we are certainly aware of the massive investment that will be needed to upgrade and expand the nation's transmission system for reliability and resource adequacy purposes. The study mentions several examples of this investment, including plans by MISO, SPP, and Texas to spend a combined total of more than \$62 billion for new transmission.²

The study also points out the retirement of conventional generation is increasing the challenges associated with the transmission system. Approximately 124,000 megawatts (MW) of coal-fired generating capacity retired during 2011 through 2025.³ This figure represents almost 40% of the 317,600 MW coal fleet that was operating in 2011. According to EIA, some 30,500 MW of coal are scheduled to retire during 2026 through 2030.⁴ According to our own data, more than 49,000 MW of coal have announced plans to retire during the same period.⁵ We expect that load growth combined with Trump administration policies will lead to a reversal of many of these

¹ The members of America's Power include electricity generators, coal producers, railroads, equipment manufacturers, and barge companies.

² National Transmission Needs Study, p. vii. MISO has approved \$21.8 billion in transmission investment, SPP has approved \$7.7 billion, and the Public Utility Commission of Texas has approved \$33 billion.

³ EIA Today in Energy, "U.S. coal-fired generating capacity retired in 2025 was the least in 15 years," April 13, 2026.

⁴ EIA, "Preliminary Monthly Electric Generator Inventory (based on Form EIA-860M as a supplement to Form EIA-860)," Release Date: August 26, 2026.

⁵ Energy Ventures Analysis maintains a proprietary database that records announcements to retire coal generating units. These announcements include IRP filings, consent agreements, press statements, and other sources. Given their nature, announced retirements are likely to represent an upper bound.

planned/announced coal retirements. Either way, these are substantial amounts of retiring generation that, unless reversed, will have to be replaced and will trigger the need for more transmission capacity and upgrades, especially to accommodate new intermittent generation. On the other hand, fewer retirements may mean less spending on transmission, saving ratepayers an unnecessary expense that could be avoided by continuing to operate coal power plants. Therefore, we suggest that DOE consider analyzing the transmission savings and other benefits that might result if coal retirements are reversed. This analysis could support and complement other administration initiatives to promote grid reliability and resource adequacy.

If you have any questions, please contact me at mbloodworth@americaspower.org or Paul Bailey at pbailey@ameircaspower.org.

Sincerely,

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

Michelle Bloodworth
President and CEO