Omaha Public Power District

OPPD BOARD OF DIRECTORS
BOARD MEETING MINUTES
August 21, 2025

The regular meeting of the Board of Directors of the Omaha Public Power District ("OPPD" or "District") was conducted virtually via WebEx audio and video conference.

Joining in person were Directors A. E. Bogner, M. J. Cavanaugh, M. R. Core, S. E. Howard, J. L. Hudson, C. C. Moody, M. G. Spurgeon and E. H. Williams. Also present were L. J. Fernandez, President and Chief Executive Officer, and Messr. S. M. Bruckner, of the Fraser Stryker law firm, General Counsel for the District, E. H. Lane, Sr. Board Operations Specialist, and other members of the OPPD Board meeting logistics support staff. Chair M. R. Core presided, and E. H. Lane recorded the minutes. Members of the executive leadership team joining in person included K. W. Brown, C.V. Fleener, S. M. Focht, G. M. Langel, T. D. McAreavey, M. V. Purnell, T. R. Via and B. A. Underwood.

Board Agenda Item 1: Chair Opening Statement

Chair Core gave a brief opening statement, including reminders for using the WebEx audio and video conferencing platform.

Board Agenda Item 2: Safety Briefing

Josh Clark, Manager, Protective Services provided safety reminders.

Board Agenda Item 3: Guidelines for Participation

Chair Core then presented the guidelines for the conduct of the meeting and instructions on the public comment process in the room and using WebEx audio and video conferencing features.

Board Agenda Item 4: Roll Call

Ms. Lane took roll call of the Board. All members were present in person.

Board Agenda Item 5: Announcement regarding public notice of meeting

Ms. Lane read the following:

> *"Notice of the time and place of this meeting was publicized by notifying the area news media; by publishing in the Omaha World Herald and Nebraska Press Association, OPPD Outlets newsletter, oppd.com and social media; by displaying such notice on the Arcade Level of Energy Plaza; and by e-mailing such notice to each of the District's Directors on August 15, 2025.*
>
> *A copy of the proposed agenda for this meeting has been maintained, on a current basis, and is readily available for public inspection in the office of the District's Corporate Secretary.*

Additionally, a copy of the Open Meetings Act is available for inspection on oppd.com."

Board Consent Action Items:

6. Approval of the May and June 2025 Financial Reports, June 2025 Meeting Minutes and the August 21, 2025 Agenda
7. Regulatory Accounting for 2025 Storm Costs – Resolution No. 6719
8. Amendment to Resolution No. 1788's Definition of Investment Securities – Resolution No. 6720
9. Debt Retirement Reserve Account – Resolution No. 6721
10. SD-6: Safety Policy Revision – Resolution No. 6722
11. SCS and JSS Generator Rewinds – Engineer's Certificate to Negotiate – Resolution No. 6723

It was moved and seconded that the Board approve the consent action items.

Chair Core noted the Board discussed the action items during the All Committees meeting held on Tuesday, August 19.

Chair Core then asked for public comment in person and on WebEx. There were no comments.

Thereafter, the vote was recorded as follows: Bogner – Yes; Cavanaugh – Yes; Core – Yes; Howard – Yes; Hudson – Yes; Moody – Yes; Spurgeon – Yes; Williams – Yes. The motion carried (8-0).

Board Discussion Action Items

12. RFP 6196 – Cass to Sarpy Transmission Construction Project – Labor Contract Award – Resolution No. 6724

Director Bogner moved to approve the discussion action item, and it was seconded by Director Cavanaugh. Chair Core asked for Board member questions or comments. Director Williams provided comments regarding the resolution.

Chair Core then asked for public comment. There were none.

Chair Core asked for comments from the Board. There were none.

Thereafter, the vote was recorded as follows: Bogner – Yes; Cavanaugh – Yes; Core – Yes; Howard – Yes; Hudson – Yes; Moody – Yes; Spurgeon – Yes; Williams – Abstain. The motion carried (7-0).

13. Corporate Officer Performance Reviews and Compensation Adjustments – Resolution No. 6725

Director Spurgeon moved to approve the discussion action item, and it was seconded by Director Cavanaugh. Chair Core asked for Board member questions or comments. Director Spurgeon provided comments in support of the resolution and expressed gratitude for the leadership of the Vice Presidents. Comments in support were also made by Director Moody, Director Cavanaugh, Director Williams and Director Core. Director Howard also made comments explaining that she would abstain from the vote.

Chair Core then asked for public comment. There were two comments from the public in attendance at the meeting.

Public Attendee (no name given), provided comments on the transparency of performance reviews.

Cheryl Weston, 1502 Fahey Dr, Omaha, provided comments on compensation adjustments and rate increases.

Chair Core then asked for public comments on WebEx. There were no comments.

Thereafter, the vote was recorded as follows: Bogner – Yes; Cavanaugh – Yes; Core – Yes; Howard – Abstain; Hudson – Yes; Moody – Yes; Spurgeon – Yes; Williams – Yes. The motion carried (7-0).

14. CEO Performance Review and Compensation Adjustment – Resolution No. 6726

Director Spurgeon moved to approve the discussion action item, and it was seconded by Director Cavanaugh. Chair Core asked for Board member questions or comments. Director Spurgeon provided comments in support of the resolution and expressed gratitude for the leadership of CEO Fernandez. Comments in support were also made by Director Moody, Director Williams, Director Cavanaugh, and Director Core.

Chair Core then asked for public comment. There were two.

David Begley, 4611 S. 96th Street, Omaha provided comments on the CEO compensation adjustment and presented materials which are attached to the minutes.

Cheryl Weston, 1502 Fahey Dr, Omaha, provided comments on compensation adjustments and rate increases.

Chair Core asked for public comments on WebEx. There was one.

Anthony Rogers Wright, 3010 Lincoln Blvd, Omaha, provided comments on the compensation adjustments and North Omaha Station.

Thereafter, the vote was recorded as follows: Bogner – Yes; Cavanaugh – Yes; Core – Yes; Howard – Abstain; Hudson – Yes; Moody – Yes; Spurgeon – Yes; Williams – Yes. The motion carried (7-0).

Board Agenda Item 15: President's Report

CEO Fernandez next presented the following information:

- July 2025 Baseload Generation
- July 2025 Balancing Generation
- July 2025 Renewables
- Turtle Creek Station
- July 2025 New All-Time Peak
- Naval Employer Recognition 2025
- Community Resource Fair
- Shine Bright
- In Memoriam – Christopher Merrill

Board Agenda Item 16: Opportunity for comment on other items of District Business

Chair Core asked for comments from the public in the room on other items of District business. There were five comments.

David Begley, 4611 S. 96th Street, Omaha provided comments on SPP and grid reliability and presented materials which are attached to the minutes.

William Bevins, 7900 N. 148th St, Waverly, NE, associated with BOLD Nebraska, provided comments of support for the North Omaha community.

Terrell McKinney, Omaha, representing BOLD Alliance, provided comments of support for the North Omaha community and environmental concerns in the area.

Cheryl Weston, 1502 Fahey Dr, Omaha, provided comments on the North Omaha community and closure of the North Omaha Station and presented materials which are attached to the minutes.

Ryan Wishart, 912 N. 49th St, provided comments of support for public power and low income assistance.

Chair Core asked for comments from the public on WebEx. There were four comments.

Anthony Rogers Wright, 3010 Lincoln Blvd, Omaha, provided comments on renewable energy sources.

David Corbin, 1002 N. 49th St, representing the Nebraska Sierra Club, provided comments on environmental concerns in North Omaha.

John Pollack, 1412 N. 35th Street, Omaha, provided comments on supporting the closure of North Omaha Station and provided a weather update.

Grace Kelly, 3308 N. 53rd St, provided comments on the environmental concerns in North Omaha and support for the North Omaha community.

There was one additional comment from the public in attendance.

John Trujillo, 4334 S. 26th St, provided comments on environmental concerns in North Omaha.

There being no further business, the meeting adjourned at 6:20 p.m.

Signed by:
S. M. Focht
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S. M. Focht
Vice President – Corporate Strategy & Governance and Assistant Secretary

DocuSigned by:
Erin H. Lane
965CE2363A0A42C...

E. H. Lane
Sr. Board Operations Specialist

As a long-time North Omaha resident who has advocated for the closing of the North Omaha OPPD Coal Plant, I have noted the OPPD committee slide (above) that the Executive Administration Team appears to be implementing concrete strategies to stop coal operations in the fourth quarter of 2026 as promised.

Being encouraged by the slide, I stand before you today, to request you, the elected OPPD Board of Directors, to support and mandate that the OPPD Executive Team administration to live up to OPPD's promise to cease operations in 2026 of Units 4 and 5 at the North Omaha OPPD Coal Plant.

I am requesting that OPPD Board of Directors to continue to monitor the administrative team in their outlined 2025 efforts (in the slide) to fulfill OPPD's pledge of its commitment to cease operations of Units 4-5 at the North Omaha OPPD Coal Plant in 2026.

Thank you for your time and consideration of my request.

Respectfully,

Cheryl Weston, Host
https://www.youtube.com/@conversationswithcherylweston
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A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate

Climate Working Group
United States Department of Energy
July 23, 2025

A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate

Report to U.S. Energy Secretary Christopher Wright

July 23, 2025

Climate Working Group:

John Christy, Ph.D.

Judith Curry, Ph.D.

Steven Koonin, Ph.D.

Ross McKitrick, Ph.D.

Roy Spencer, Ph.D.

This report is being disseminated by the Department of Energy. As such, this document was prepared in compliance with Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554) and information quality guidelines issued by the Department of Energy.

Suggested citation:

Climate Working Group (2025) A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate. Washington DC: Department of Energy, July 23, 2025

SECRETARY'S FOREWORD

Energy, Integrity, and the Power of Human Potential

Over my lifetime, I've had the privilege of working as an energy entrepreneur across a range of fields—nuclear, geothermal, natural gas, and more—and I now serve as Secretary of Energy under President Donald Trump. But above all, I'm a physical scientist who sees modern energy as nothing short of miraculous. It powers every aspect of modern life, drives every industry, and has made America an energy powerhouse with the ability to fuel global progress.

The rise of human flourishing over the past two centuries is a story worth celebrating. Yet we are told—relentlessly—that the very energy systems that enabled this progress now pose an existential threat. Hydrocarbon-based fuels, the argument goes, must be rapidly abandoned or else we risk planetary ruin.

That view demands scrutiny. That's why I commissioned this report: to encourage a more thoughtful and science-based conversation about climate change and energy. With my technical background, I've reviewed reports from the Intergovernmental Panel on Climate Change, the U.S. government's assessments, and the academic literature. I've also engaged with many climate scientists, including the authors of this report.

What I've found is that media coverage often distorts the science. Many people walk away with a view of climate change that is exaggerated or incomplete. To provide clarity and balance, I asked a diverse team of independent experts to critically review the current state of climate science, with a focus on how it relates to the United States.

I didn't select these authors because we always agree—far from it. In fact, they may not always agree with each other. But I chose them for their rigor, honesty, and willingness to elevate the debate. I exerted no control over their conclusions. What you'll read are their words, drawn from the best available data and scientific assessments.

I've reviewed the report carefully, and I believe it faithfully represents the state of climate science today. Still, many readers may be surprised by its conclusions—which differ in important ways from the mainstream narrative. That's a sign of how far the public conversation has drifted from the science itself.

To correct course, we need open, respectful, and informed debate. That's why I'm inviting public comment on this report. Honest scrutiny and scientific transparency should be at the heart of our policymaking.

Climate change is real, and it deserves attention. But it is not the greatest threat facing humanity. That distinction belongs to global energy poverty. As someone who values data, I know that improving the human condition depends on expanding access to reliable, affordable energy. Climate change is a challenge—not a catastrophe. But misguided policies based on fear rather than facts could truly endanger human well-being.

We stand at the threshold of a new era of energy leadership. If we empower innovation rather than restrain it, America can lead the world in providing cleaner, more abundant energy—lifting billions out of poverty, strengthening our economy, and improving our environment along the way.

EXECUTIVE SUMMARY

This report reviews scientific certainties and uncertainties in how anthropogenic carbon dioxide (CO_2) and other greenhouse gas emissions have affected, or will affect, the Nation's climate, extreme weather events, and selected metrics of societal well-being. Those emissions are increasing the concentration of CO_2 in the atmosphere through a complex and variable carbon cycle, where some portion of the additional CO_2 persists in the atmosphere for centuries.

Elevated concentrations of CO_2 directly enhance plant growth, globally contributing to "greening" the planet and increasing agricultural productivity [Section 2.1, Chapter 9]. They also make the oceans less alkaline (lower the pH). That is possibly detrimental to coral reefs, although the recent rebound of the Great Barrier Reef suggests otherwise [Section 2.2].

Carbon dioxide also acts as a greenhouse gas, exerting a warming influence on climate and weather [Section 3.1]. Climate change projections require scenarios of future emissions. There is evidence that scenarios widely-used in the impacts literature have overstated observed and likely future emission trends [Section 3.1].

The world's several dozen global climate models offer little guidance on how much the climate responds to elevated CO_2, with the average surface warming under a doubling of the CO_2 concentration ranging from 1.8°C to 5.7°C [Section 4.2]. Data-driven methods yield a lower and narrower range [Section 4.3]. Global climate models generally run "hot" in their description of the climate of the past few decades – too much warming at the surface and too much amplification of warming in the lower- and mid-troposphere [Sections 5.2-5.4]. The combination of overly sensitive models and implausible extreme scenarios for future emissions yields exaggerated projections of future warming.

Most extreme weather events in the U.S. do not show long-term trends. Claims of increased frequency or intensity of hurricanes, tornadoes, floods, and droughts are not supported by U.S. historical data [Sections 6.1-6.7]. Additionally, forest management practices are often overlooked in assessing changes in wildfire activity [Section 6.8]. Global sea level has risen approximately 8 inches since 1900, but there are significant regional variations driven primarily by local land subsidence; U.S. tide gauge measurements in aggregate show no obvious acceleration in sea level rise beyond the historical average rate [Chapter 7].

Attribution of climate change or extreme weather events to human CO_2 emissions is challenged by natural climate variability, data limitations, and inherent model deficiencies [Chapter 8]. Moreover, solar activity's contribution to the late 20th century warming might be underestimated [Section 8.3.1].

Both models and experience suggest that CO_2-induced warming might be less damaging economically than commonly believed, and excessively aggressive mitigation policies could prove more detrimental than beneficial [Chapters 9, 10, Section 11.1]. Social Cost of Carbon estimates, which attempt to quantify the economic damage of CO_2 emissions, are highly sensitive to their underlying assumptions and so provide limited independent information [Section 11.2].

U.S. policy actions are expected to have undetectably small direct impacts on the global climate and any effects will emerge only with long delays [Chapter 12].

PREFACE

This document originated in late March 2025 when Secretary Wright assembled an independent group to write a report on issues in climate science relevant for energy policymaking, including evidence and perspectives that challenge the mainstream consensus. We agreed to undertake the work on the condition that there would be no editorial oversight by the Secretary, the Department of Energy, or any other government personnel. This condition has been honored throughout the process and the writing team has worked with full independence.

The group began working in early April with a May 28 deadline to deliver a draft for internal DOE review. The short timeline and the technical nature of the material meant that we could not comprehensively review all topics. Rather, we chose to focus on topics that are treated by a serious, established academic literature; that are relevant to our charge; that are downplayed in, or absent from, recent assessment reports; and that are within our competence.

While the report is intended to be accessible to non-experts, we have omitted some introductory or explanatory material that can easily be accessed elsewhere. Nor have we attempted to survey the entire literature related to the topics covered. We have focused as much as possible on literature published since 2020 and referenced previous IPCC and NCA assessment reports. We have also used data through 2024 where possible.

The writing team is grateful to Secretary Wright for the opportunity to prepare this report and for his support of independent scientific assessment and open scientific debate. We are also grateful to a team of anonymous DOE and national lab reviewers whose input helped improve the final report.

John Christy, Ph.D.

Judith Curry, Ph.D.

Steven Koonin, Ph.D.

Ross McKitrick, Ph.D.

Roy Spencer, Ph.D.

U.S. DEPARTMENT of ENERGY

Department of Energy Releases Report on Evaluating U.S. Grid Reliability and Security

The Department of Energy warns that blackouts could increase by 100 times in 2030 if the U.S. continues to shutter reliable power sources and fails to add additional firm capacity.

Energy.gov

July 7, 2025

4 min

The Department of Energy warns that blackouts could increase by 100 times in 2030 if the U.S. continues to shutter reliable power sources and fails to add additional firm capacity.

WASHINGTON— The U.S. Department of Energy (DOE) today released its Report on Evaluating U.S. Grid Reliability and Security. The report fulfills Section 3(b) of President Trump's Executive Order, *Strengthening The Reliability And Security Of The United States Electric Grid*, by delivering a uniform methodology to identify at-risk regions and guide Federal reliability interventions.

The analysis reveals that existing generation retirements and delays in adding new firm capacity, driven by the radical green agenda of past administrations, will lead to a surge in power outages and a growing mismatch between electricity demand and supply, particularly from artificial intelligence (AI)-driven data center growth, threatening America's energy security.

"This report affirms what we already know: The United States cannot afford to continue down the unstable and dangerous path of energy subtraction previous leaders pursued, forcing the closure of baseload power sources like coal and natural gas," Secretary Wright said. "In the coming years, America's reindustrialization and the AI race will require a significantly larger supply of around-the-clock, reliable, and uninterrupted power. President Trump's administration is committed to advancing a strategy of energy addition, and supporting all forms of energy that are affordable, reliable, and secure. If we are going to keep the lights on, win the AI race, and keep electricity prices from skyrocketing, the United States must unleash American energy."

Highlights of the Report:

- **The status quo is unsustainable.** DOE's analysis shows that, if current retirement schedules and incremental additions remain unchanged, most regions will face unacceptable reliability risks within five years and the Nation's electrical power grid will be unable to meet expected demand for AI, data centers, manufacturing and industrialization while keeping the cost of living low for all Americans. Staying on the present course would undermine U.S. economic growth, national security, and leadership in emerging technologies.
- **Grid growth must match the pace of AI innovation.** Electricity demand from AI-driven data centers and advanced manufacturing is rising at a record pace. The magnitude and speed of projected load growth cannot be met with existing approaches to load addition and grid management. Radical change is needed to unleash the transformative potential of innovation.
- **With projected load growth, retirements increase the risk of power outages by 100 times in 2030.** Allowing 104 GW of firm generation to retire by 2030—without timely replacement—could lead to significant outages when weather conditions do not accommodate wind and solar generation. Modeling shows annual outage hours could increase from single digits today to more than 800 hours per year. Such a surge would leave millions of households and businesses vulnerable. We must renew a focus on firm generation and continue to reverse radical green ideology in order to address this risk.
- **Planned supply falls short, reliability at risk.** The 104 GW of plant retirements are replaced by 209 GW of new generation by 2030; however, only 22 GW comes from firm baseload generation sources. Even assuming no retirements, the model found outage risk in several regions rises more than 30-fold, proving the queue alone cannot close the dependable-capacity deficit.
- **Old tools won't solve new problems.** Traditional peak-hour tests to evaluate resource adequacy do not sufficiently account for growing dependence on neighboring 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.

DOE's report identifies regions most vulnerable to outages under various weather and retirement scenarios and offers capacity targets needed to restore acceptable reliability. The methodology also informs the potential use of DOE's emergency authority under Section 202(c) of the Federal Power Act.

Click here for a fact sheet on the report.

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Energy Department Issues Final Rule Delaying Compliance Deadline for Manufactured Housing Standards

July 1, 2025

Energy Department Expands Commitment to Collaboration with Norway on Water Power Research and Development

July 7, 2025

Tags:

STRENGTHEN GRID RELIABILITY AND SECURITY

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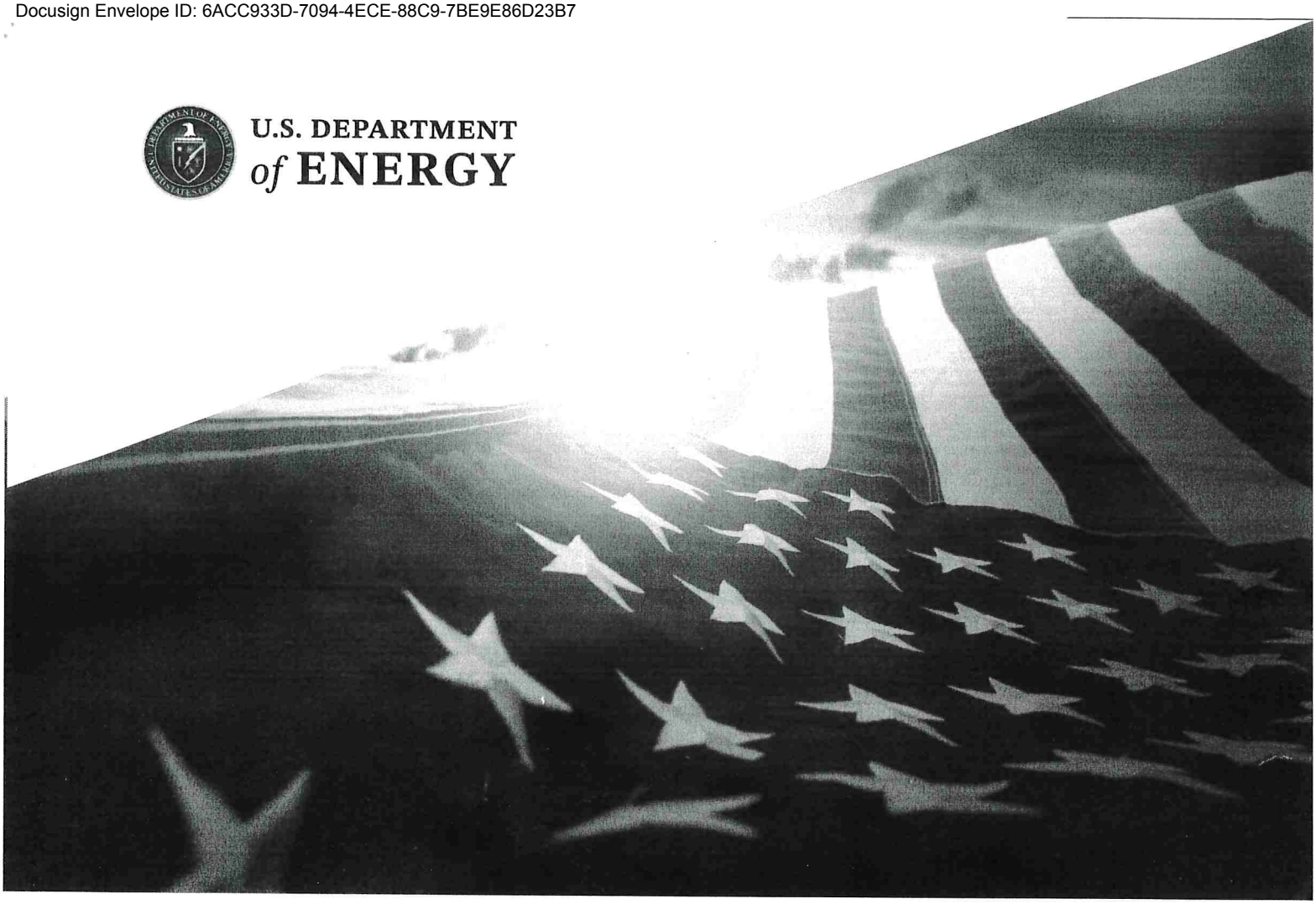

Resource Adequacy Report

Evaluating the Reliability and Security of the United States Electric Grid

July 2025

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 approach[2] 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 metrics[6] 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:

$$\frac{100\ MWh\ (of\ unserved\ energy)}{10{,}000{,}000\ MWh\ (of\ total\ energy\ delivered\ in\ a\ year)} x100 = 0.001\ percent$$

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.

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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.

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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.

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.

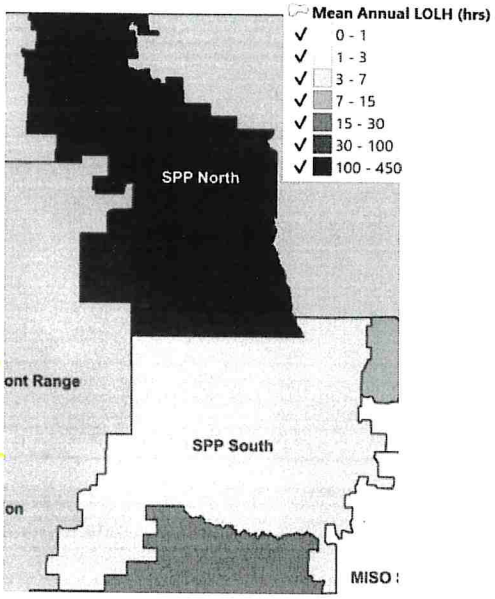
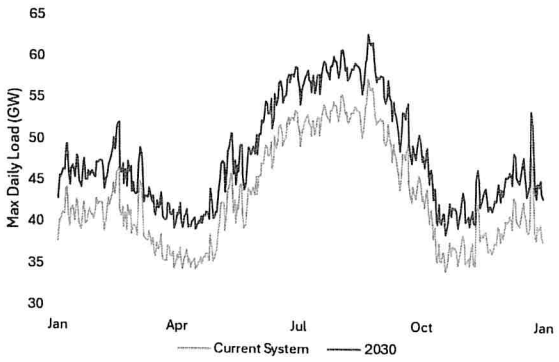


Table 12. Summary of SPP Reliability Metrics

Reliability Metric	Current System	2030 Projection		
		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).



Subregion	2024	2030
SPP-N	12,668	14,676
SPP-S	44,898	48,337
Total	57,449	62,891

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

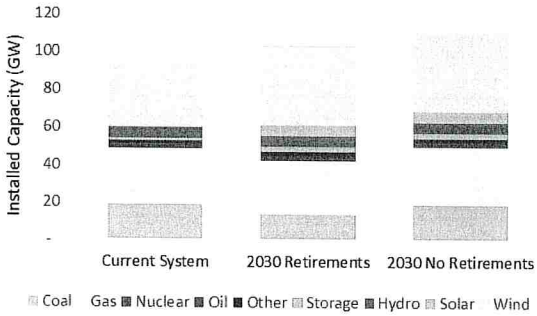


Figure 21. SPP Generation Capacity by Technology and Scenario

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)**