



January 25, 2026

VIA E-MAIL

Chris Wright
Secretary of Energy
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Re: Request for Emergency Order Under Section 202(c) of the Federal Power Act

Dear Secretary Wright:

Pursuant to Section 202(c) of the Federal Power Act (“FPA”),¹ and part 205, subpart W, of the regulations of the Department of Energy (“DOE”),² ISO New England Inc. (“ISO-NE”) respectfully requests that the Secretary of Energy (“Secretary”) find that a condition exists within the ISO-NE region that requires intervention by the Secretary, in the form of a Section 202(c) emergency order, to preserve the reliability of the bulk electric power system. ISO-NE respectfully requests that the Secretary issue an order immediately, effective January 25, 2026, authorizing generating units located within the ISO-NE region to operate up to their maximum generation output levels, notwithstanding air quality or other permit limitations arising under federal, state, or local law or regulation, or other applicable source of law. While ISO-NE is not currently experiencing emergency conditions, given the forecasted long-duration extreme cold weather event, ISO-NE foresees the need to maximize the availability of all the generating resources in the New England region, *i.e.* all generating resources that are part of the generation resource mix are needed, including the resource described in Exhibit A.

In accordance with 10 CFR § 205.391(a), ISO-NE requests that such order be entered as soon as possible today, January 25, 2026, to be made effective as of the date of the issuance. ISO-NE further requests that the order remain in effect through January 31, 2026.

I. BACKGROUND

New England is one of many regions that are in the initial stages of a prolonged severe cold weather event that threatens electric reliability throughout the country. ISO-NE issued a cold

¹ 16 U.S.C § 824a(c).

² 10 C.F.R. Part 205, Subpart W.

weather watch on January 22, 2026. In many parts of the ISO-NE Balancing Authority Area, temperatures for January 25, 26, and 27, 2026 are forecasted to drop well below average, and abnormally low temperatures are expected to persist through January 30, 2026.³ In addition, there is a significant snowstorm forecasted for January 25, 2026 with snowfall estimates ranging from 12 to 20 inches across New England. This prolonged severe cold weather event is expected to result in a sustained high level of demand for electricity. While the vast majority of generating units in the ISO-NE region continue to function adequately, some units may experience difficulty due to emissions/air permitting limitations, or other operating constraints. ISO-NE has the ability to ensure the supply of generation will continue to be sufficient to meet demand and reserve through measures available in its Operating Procedures such as Master Local Control Center Procedure No. 2 and Operating Procedure No. 4. Granting the relief requested herein will ensure the continued availability of generating resources in the region.

II. RELIEF REQUESTED

ISO-NE has been notified by a generator owner that one of its generating units will not be able to operate due to emissions, effluent, or other limits established by federal environmental permits and state requirements, or that, due to continuing cold weather conditions, may become subject to such operational limitations. This unit is described in Exhibit A to this request.⁴

During the extreme cold weather event described above, ISO-NE anticipates that all generating resources may be needed. Accordingly, ISO-NE seeks an immediate order from DOE authorizing the provision of energy from all generating units identified in Exhibit A, as well as any other generating units subject to emissions or other permit limitations.

This request for relief is narrowly tailored to allow only the exceedances that are necessary to help ensure reliability of the grid during the period of relief requested herein. Upon issuance of the requested order by DOE, ISO-NE will issue a market notice to all ISO-NE market participants. The notice would require that any market participant that finds it necessary to utilize this allowance

³ See https://www.iso-ne.com/static-assets/documents/100031/2026-01-20_21-day_energy_emergency_forecast_and_report.pdf

⁴ In the event that ISO-NE identifies additional generating units that it deems necessary to operate in excess of federal environmental permitting limits in order to maintain the reliability of the power grid in the ISO-NE region, ISO-NE shall provide prompt written notice to the Department of Energy at AskCR@hq.doe.gov with the name and location of those units that ISO-NE has identified, as well as notice by the same means as an updated Exhibit A to its request such additional generation units, the fuel type of such unit, and the anticipated category of environmental impact, at 11:00 Eastern Standard Time or 21:00 Eastern Standard Time, whichever follows closest in time to the unit identification by ISO-NE to the greatest extent feasible. ISO-NE requests that such additional generation units be deemed a resource covered by any order for the hours prior to the required written notice to DOE. ISO-NE further requests that it dispatch such additional generating units, provided that if DOE notifies ISO-NE that it does not approve of such generation unit being designated as a resource covered by any order, such generation unit shall not constitute a covered resource upon notification from DOE.

must notify ISO-NE in advance of doing so. This notification requirement would apply to all generating units, including those identified in Exhibit A.

ISO-NE commits to providing daily notice to DOE of each of those generating units that has been designated to use this allowance. ISO-NE is prepared to provide any additional information DOE may request. ISO-NE also commits to respond to any requests for additional information on an expedited basis.

III. CONCLUSION

ISO-NE does not request this authorization lightly and understands the importance of the environmental permit limits that are at issue. Granting the authorization requested will help ISO-NE maximize the availability of all generating resources in New England to meet expected demand for electricity.

ISO-NE greatly appreciates the DOE's expedited consideration of this request. Please do not hesitate to contact the undersigned if you have any questions or require additional information in order to act on this request.

Respectfully submitted,

Stephen George

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Enclosure: Exhibit A

cc: Vamsi Chadalavada, ISO-NE President and Chief Executive Officer
Maria Gulluni, ISO-NE VP, General Counsel and Chief Compliance Officer
Anne George, ISO-NE VP, Chief External Affairs and Communications Officer

Exhibit A
Units Identified as Likely to Encounter Permit Limitations

[illegible]