

August 15, 2018

The Honorable Rick Perry  
Secretary of Energy  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585

Dear Secretary Perry:

We are writing as current or former state Public Service Commissioners to commend you and the department for calling attention to risks to the resilience of the electricity grid. We urge you to avoid the retirement of more coal-fired power plants until the impacts of these retirements on grid resilience and national security have been fully assessed. Some 29,000 megawatts of coal-fired generation are scheduled to retire over the next five years.

Much of the discussion about the electricity grid has focused on the retirement of traditional sources of baseload electricity and the potentially harmful effects of these retirements on fuel security, grid resilience and national security. According to the North American Electric Reliability Corporation, "premature retirements of fuel secure baseload generation stations reduce resilience to fuel supply disruptions." In addition, PJM and ISO-NE have raised concerns about fuel security.

The amount of on-site fuel at power plants is a useful way to look at fuel security. For the period 2015-2017, the smallest monthly stockpile of coal was 65 days of coal burn and the largest was 105 days, according to EIA data. Even if there are disruptions in the coal supply chain, these stockpiles provide assurance that coal will be available to generate electricity for several weeks. Neither natural gas nor renewables provides the same degree of fuel security.

Unfortunately, plans for early retirement of large portions of our nation's coal fleet have been announced, potentially impacting national security. It is extremely important that these plans do not move forward until the impacts on grid resilience, fuel supply and generation, nationally and within regions, have been fully assessed and better understood.

We thank you and your team for your dedicated work and commitment.

Respectfully,

Commissioner Jeremy Oden  
Alabama PSC, Chairman of NARUC Clean Coal Committee

Commissioner Talina Mathews  
Kentucky PSC

Chairman Bill Russell  
Wyoming PSC

Commissioner Dr. Kenneth Hill  
Tennessee PSC

Commissioner Emeritus Lisa Edgar  
Florida PSC, Former President of NARUC

Commissioner Tony O'Donnell  
Montana PSC

Commissioner Emeritus Jon McKinney  
West Virginia PSC

Commissioner Emeritus Larry Landis  
Indiana URC

Commissioner Emeritus Terry Jarrett  
Missouri PSC

Commissioner Emeritus Brian Kalk  
North Dakota PSC

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Secretary of Energy  
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1000 Independence Avenue, S.W.  
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Dear Secretary Perry:

We are writing as former Department of Energy officials to commend you and the department for calling attention to risks to the resilience of the electricity grid. Also, we urge you to prevent the retirement of more coal-fired power plants until the impacts of these retirements on grid resilience and national security have been fully assessed. Some 29,000 megawatts of coal-fired generation have announced intentions to retire over the next five years.

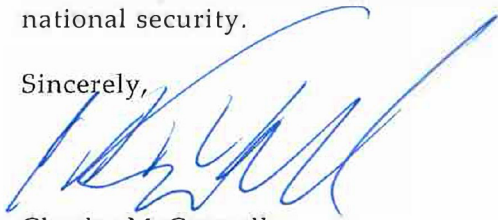
Much of the discussion about the electricity grid has focused on the retirement of traditional sources of baseload electricity and the potentially harmful effects of these retirements on fuel security, grid resilience and national security. According to the North American Electric Reliability Corporation, "premature retirements of fuel secure baseload generation stations reduces resilience to fuel supply disruptions." Others, such as PJM and ISO-NE, also have raised concerns about fuel security.

The amount of coal stockpiled at power plants is a useful way to look at fuel security. For the period 2015-2017, the smallest monthly stockpile was 65 days of coal burn and the largest was 105 days, according to EIA data. Over the three-year period, stockpiles averaged 84 days of coal burn for bituminous coal and 85 days for subbituminous coal. If there are disruptions in the coal supply chain, these stockpiles provide assurance that coal will be available to generate electricity for several weeks. Neither natural gas nor renewables provide the same degree of fuel security.

Unfortunately, almost 40 percent of the nation's coal fleet has retired or announced plans to retire. These retiring coal plants are being replaced by electricity sources that are not fuel secure. In fact, at least 40 percent of the nation's electricity sources are not fuel secure.

We thank you and the department for your work to ensure grid resilience and promote national security.

Sincerely,



Charles McConnell  
Asst. Sec. Fossil Energy  
(2012-2013)



Jeffery D. Jarrett  
Asst. Sec. Fossil Energy  
(2006-2007)



Carl Michael Smith  
Asst. Sec. Fossil Energy  
(2002-2004)



Robert H. Gentile  
Asst. Sec. Fossil Energy  
(1990-1991)