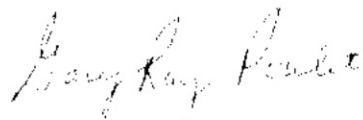


the United States's economic and national security and military preparedness by ensuring that an abundant supply of reliable energy is readily accessible in every State and territory of the Nation."¹⁵ In addition, in announcing the Executive Order on Removing Barriers to American Leadership in Artificial Intelligence, the White House stated that "[t]he United States must act decisively to retain leadership in AI and enhance our economic and national security."¹⁶ Retaining sources of reliable electricity is essential for the U.S. to meet its AI goal.

Consistent with these national security concerns, state and grid regulators have attested to the Final Rule's significant, foreseeable, and negative impacts on grid reliability and energy prices. There is a significant likelihood that power plants will be forced to retire based on inability to comply with the Final Rule's requirements by the 2027 deadline.

WFEC appreciates the opportunity to request a two-year exemption. WFEC requests the EPA grant WFEC HU-UNIT1 a two-year exemption from the Final Rule based on the significant national security issues and technological challenges described above.

Respectfully,



Gary R. Roulet
Chief Executive Officer

cc: Matthew A. Caves, WFEC, Vice President, Legal & Regulatory Compliance
Justin Soderberg, WFEC, Vice President, Generation
Mark Hardaway, WFEC, Plant Manager, Hugo

¹⁵ Executive Order 14154, *Unleashing American Energy*, 90 Fed. Reg. 8353 (Jan. 29, 2025).

¹⁶ The White House, *Fact Sheet: President Donald J. Trump Takes Action to Enhance America's AI Leadership* (Jan. 23, 2025), <https://www.whitehouse.gov/fact-sheets/2025/01/fact-sheet-president-donald-j-trump-takes-action-to-enhance-americas-ai-leadership/>.