

SPP portions of the grid.²⁹ NERC reports that, with respect to the MISO region, “[r]esource additions are not keeping up with generator retirements and demand growth” and “[r]eserve margins fall below Reference Margin Levels (RML) in winter and summer.”³⁰ Although NERC finds SPP is in better shape, NERC has flagged the SPP portion of the grid in the upper Midwest as “elevated risk” and states that “[c]urrently, there are over 8 GW of coal and gas-fired generators that have indicated that they may retire within the next 10 years, making the resource outlook unclear.”³¹

The potential for unit retirements in South Dakota’s portion of the grid places more pressure on existing resources to provide reliable and affordable energy—including providing energy to the military installations in the state. The interruption of power delivery from a grid failure causes damage to public health. Affordable and consistent power allows medical providers to provide essential services to the elderly, infirm, and to vulnerable individuals with chronic health conditions. Evidence from grid failures during Winter Storm Elliott in another region (PJM) documents health impacts and morbidity caused by those events.³²

As to the national defense,³³ reliable power is crucial to sustain the following functions:

- Power military bases;
- Power emergency services to enable quick responses to emergencies, such as acts of war, weather catastrophes, and cybersecurity threats;
- Power essential government functions that prevent threats to the country;
- Allow fast deployment of military resources; and
- Power manufacturing facilities that make military weapons, vehicles, vessels, and aircraft infrastructure.

The Department of Defense runs global military operations from domestic bases. Operations require a resilient and dependable power supply for mission readiness. Back home, on-base generation and microgrids are necessary to support the thousands of military workers working and living on- and off-base, including the goods and services that support those communities.³⁴ Power outages destabilize the military defense.

South Dakota is home to Ellsworth Air Force Base and the 28th Bomb Wing, which provides critical combat air power and support. Ellsworth AFB is also the largest employer in western South Dakota and the second largest employer in the State. Accordingly, it serves the

²⁹ NERC, *2024 Long-term Reliability Assessment* (Dec. 2024),

https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_Long%20Term%20Reliability%20Assessment_2024.pdf

³⁰ *Id.* at 6.

³¹ *Id.* at 14.

³² See, e.g., Hanchey, “Mortality Surveillance During Winter Storm Uri, United States – 2021,” *Disaster Med Public Health Prep* (Dec. 2023), <https://pubmed.ncbi.nlm.nih.gov/37974501/>; Sharma, “Winter Storm Elliott death toll climbs to 56 as thousands still without power in -40 temperatures,” *Yahoo News* (Dec. 26, 2022), <https://www.yahoo.com/news/winter-storm-elliott-power-outages-154557710.html>.

³³ See <https://www.utilitydive.com/news/aging-grid-threatens-national-security-reliability-cyber-threat-transmission/705362/>.

³⁴ https://acore.org/wp-content/uploads/2021/10/MGI_National_Security_Transmission_Factsheet.pdf