

# Congress of the United States

Washington, DC 20515

October 30, 2025

The Honorable Christopher Wright  
Secretary of Energy  
United States Department of Energy  
1000 Independence Ave, SW  
Washington, D.C. 20585-0800

Dear Secretary Wright:

Thank you for your leadership in advancing President Trump's America First energy agenda and restoring a commonsense approach to energy reliability and security. Your recent actions under Section 202(c) of the Federal Power Act, including your order to preserve operations at the J.H. Campbell Power Plant in Michigan, reaffirm the Department's commitment to ensuring that American communities are not left in the dark by closures of critical baseload generation. As a fellow Coloradan, you know firsthand the consequences of the state's politically driven rush to decommission otherwise safe, reliable, and efficient generation.

I write to formally request that you issue a similar emergency order under Section 202(c) to maintain the operation of the Comanche Generating Station in Pueblo, Colorado. Comanche is the largest power plant in the state and a cornerstone of electric reliability in the region. It is also a lifeline for Pueblo County — a working community that has already borne more than its share of the costs of Colorado's rapid and disorderly energy transition. Pueblo County, long a Democratic stronghold, supported President Trump in 2024, reflecting the growing desire among working families for policies that deliver real economic opportunity and respect for the industries that built their communities.

## **1. An Emergency Threat to Reliability**

Public Service Company of Colorado, which operates the Comanche plant, has warned in formal filings that the state's current resource plan does not meet industry standard reliability metrics. Colorado's grid is losing firm, dispatchable generation faster than replacement capacity can be brought online, while demand continues to grow. The Western Electricity Coordinating Council and the North American Electric Reliability Corporation have both identified Colorado and the broader western grid as facing elevated risks of energy shortfalls in the coming years.

When operational, Comanche Units 2 and 3 together provide more than 1,035 megawatts of 24/7 generation that cannot be replaced by intermittent resources. If Comanche 2 retires this year as scheduled, and Comanche 3 continues to face mechanical and regulatory constraints, southern Colorado will face a significant reliability gap. These risks are not theoretical: they directly endanger public health and safety, particularly during extreme weather when renewable output is lowest.

## **2. A Local and National Economic Imperative**

Comanche's contribution to Pueblo County and southern Colorado is immense. The plant generates approximately \$200 million per year in direct and indirect economic activity and \$31 million annually in property tax revenue, supporting schools, hospitals, roads, and first responders. Premature closure would cost the community nearly \$1 billion in lost tax revenue over time. No federal or state "just transition" program has offered remotely comparable replacement investment.

The Colorado Public Utilities Commission, however, has repeatedly disregarded Pueblo's legitimate concerns. Despite years of engagement and expert analysis by local leaders through the Pueblo Innovative Energy Solutions Advisory Committee, the Commission largely ignored Pueblo's recommendations, including proposals for new

dispatchable generation that could maintain reliability and replace lost tax revenue. As a result, there is no credible plan to keep the grid stable or the community whole.

**3. The Need for Federal Action under Section 202(c)**

Under Section 202(c) of the Federal Power Act, the Secretary of Energy may order temporary emergency operations of generating facilities when “an emergency exists by reason of a shortage of electric energy or a shortage of facilities for the generation of electric energy.” The Department’s recent action in Michigan provides a clear precedent. Like the Midwest, Colorado is now confronting a regional emergency: the retirement of reliable thermal generation amid inadequate replacement resources.

Accordingly, I respectfully request that the Department:

1. Determine that an emergency exists in Colorado due to a shortage of dispatchable generation and rising risk of reserve shortfalls;
2. Direct PSCo to maintain full dispatch capability at Comanche Units 2 and 3 until sufficient replacement generation is online; and
3. Authorize temporary operation under Section 202(c) to ensure reliability while remaining consistent, to the maximum extent practicable.

This targeted, time-limited action would mirror the Department’s approach in Michigan — ensuring that reliability, affordability, and American energy security remain paramount while states realign their policies to reflect practical realities.

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For decades, Pueblo has powered Colorado. Now Pueblo needs Washington’s help to keep the lights on, the jobs in place, and the grid stable. The Comanche Generating Station is an essential component of the region’s reliability and economic fabric. A Section 202(c) order would demonstrate the Department’s resolve to put reliability first and to stand with working communities that have long powered this nation.

Thank you for your attention to this urgent matter. I would welcome the opportunity to discuss this further with you or your staff at your earliest convenience.

Sincerely,

  
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Jeff Hurd  
Member of Congress