September 24, 2025

Mr. Scott Kupor
Director
Office of Personnel Management
1900 E Street NW
Washington, DC 20415-0001

*Re: Review of Federal Energy Regulatory Commission Agency Actions September 8, 2025, through September 19, 2025*

Dear Director Kupor:

Continuing the practice of highlighting the important work that the Federal Energy Regulatory Commission (FERC or the Commission) accomplishes every day for the American people, I am providing you with this summary of key actions we have taken recently to ensure energy affordability and reliability for consumers.

**Issued the following Orders under Section 7 of the Natural Gas Act to ensure that infrastructure needed to ensure plentiful supplies of natural gas at reasonable prices is in place, including but not limited to:**

1. Issued an Order Terminating the draft Updated Certificate Policy Statement proceeding determining that the 1999 Certificate Policy Statement continues to provide the appropriate framework for reviewing proposed natural gas projects.
2. Authorized the Rover-Bulger Compressor Station and Harmon Creek Meter Station Expansion Project in Washington County, PA, designed to enable receipt of up to an additional 400,000 Dth/d of natural gas supply into the interstate grid.

**Issued the following Orders for hydropower projects under Part I of the Federal Power Act, including but not limited to:**

1. Issued two Orders for new licenses to CRP NH Smith, LLC for the 15-MW J. Brodie Smith Project and the 2.15-MW Gorham Project in New Hampshire.
2. Issued six Orders for new licenses to Great Lakes Hydro America, LLC for the 3.17-MW Sawmill Project, the 3.72-MW Shelburne Project, the 4.8-MW Upper Gorham Project, the 3.22-MW Cross Power Project, the 7.92-MW Cascade Project, and the 7.9-MW Riverside Project in New Hampshire.
3. Issued two Orders for licenses to ALLETE, Inc. for the 1.084-MW Prairie River Hydroelectric Project and the 1.9875-MW Grand Rapids Hydroelectric Project in Minnesota.

4. Granted a stay of the construction deadlines under Article 301 of the license for the Old Harbor Project. The 262-kW unconstructed project was licensed in 2016 and will be located on East Fork Mountain Creek near the Alutiiq village of Old Harbor in Kodiak Island Borough, Alaska.
5. Addressed arguments raised in Southeast Oklahoma Power Corporation's rehearing request of staff's April 14, 2025, letter terminating the integrated licensing process for the Pushmataha Pumped Storage Project, further explaining and sustaining the termination.
6. Addressed arguments raised on rehearing of staff's April 9, 2025, order approving, in part, a Shoreline Management Plan Update for Alabama Power Company's Martain Dam Hydroelectric Project. The Commission further explained and sustained staff's order which allows Alabama Power to permit non-commercial piers, landings, boat docks, or similar structures that can accommodate up to 10 watercraft for condominiums and multi-family developments without authorization from the Commission.

**Issued one hundred and thirty-eight (138) Orders under the Federal Power Act, including but not limited to:**

1. Matters concerning electric utility rates, terms, and conditions under Sections 205 and 206 of the Federal Power Act, including but not limited to:

    a. Issued an order setting aside, in part, the Commission's February 6, 2024, order rejecting PJM's capacity market reforms to address resource adequacy.
    b. Issued an order on a refund plan to address credit payment obligations under Attachment Z2 of the Southwest Power Pool tariff for service taken from 2008 to 2016.
    c. Accepted Southern Companies' proposed revisions to its generator interconnection process to accelerate the interconnection of new generation resources to the grid.
    d. Granted a request for waiver of certain SPP tariff deadlines to allow the SAGE Development Authority to continue development of a planned 235 MW generating facility.
    e. Granted FirstEnergy's request for transmission incentives for a series of high-voltage transmission projects in PJM Interconnection.
    f. Granted, in part, the Maine Office of Public Advocate's request for additional information to assist in their review of the New England Transmission Owners' annual formula rate update, ensuring appropriate transparency in the recovery of transmission costs in the region.
    g. Granted transmission rate incentives to MGS Iowa, facilitating its participation in Midcontinent ISO's competitive transmission development process.

2. Corporate matters under Section 203 of the Federal Power Act, including but not limited to:

    a. Authorized the transfer of an 821 MW gas-fired generating facility in PJM.
    b. Authorized the termination of several sale-leaseback agreements, allowing Arizona Public Service Company to reacquire certain ownership interests in the Palo Verde Nuclear Generating Station.

**Issued Orders protecting and improving the reliability and security of the Bulk-Power System, under Section 215 of the Federal Power Act, including but not limited to:**

1. Issued a Notice of Proposed Rulemaking (NOPR) proposing to approve Critical Infrastructure Protection (CIP) Reliability Standard CIP-003-11, which identifies the required cyber security management controls for low impact Bulk Electric System (BES) Cyber Systems as well as seek comments on the continuing evolution of threats of compromise to low impact BES Cyber Systems.
2. Issued a NOPR proposing to approve modifications to multiple CIP Reliability Standards and definitions within the North American Electric Reliability Corporation (NERC) Glossary that, holistically, would enable the application of virtualization and other new technologies in a secure manner. Virtualization is the process of creating virtual, as opposed to physical, versions of computer hardware to minimize the amount of physical computer hardware resources required to perform various functions.
3. Issued a final rule directing NERC to develop new or modified Reliability Standards to update the existing supply chain risk management requirements. The final rule would, first, direct NERC to address the identification of and response to supply chain risks and, second, extend supply chain protections to protected cyber assets. NERC must provide responsive modifications within 18 months of the effective date of this final rule.
4. Issued an order approving Reliability Standard EOP-012-3 (Extreme Cold Weather Preparedness and Operations), which helps ensure that adequate generation is available during extreme cold weather. The order directs NERC to submit biennial informational filings starting in October 2026 and going through October 2034 to confirm the effectiveness of the Standard.
5. Issued an order, in response to Executive Order 14308 (Empowering Commonsense Wildfire Prevention and Response), directing NERC to submit a report on best practices to reduce the risk of wildfire ignition from the Bulk-Power System, by May 1, 2026. The Commission also issued a notice to convene a Technical Conference on October 21, 2025, to discuss cost-effective best practices

to reduce the risk of wildfire ignition from the Bulk-Power System in response to the Executive Order.

**Issued necessary assessments for natural gas under the Natural Gas Act, including but not limited to:**

1. Issued an Environmental Assessment for Golden Pass LNG Terminal's Supply Lateral Project in Texas.
2. Issued an Environmental Assessment for Southern Star Central Gas Pipeline, Inc.'s Cedar Vale Compressor Station Project in Oklahoma.

**Issued necessary assessments for hydropower projects under the Federal Power Act, including but not limited to:**

1. Issued an Environmental Assessment for the relicensing of Consolidated Hydro New York, LLC's 1,656-kW Victory Mills Hydroelectric Project in New York.
2. Issued an Environmental Assessment for an amendment of Swan Lake North Hydro LLC's unconstructed Swan Lake North Pumped Storage Hydroelectric Project in Oregon.
3. Issued an Environmental Assessment for the relicensing of California Department of Water Resources' 272-MW Devil Canyon Hydroelectric Project in California.
4. Issued a Draft Environmental Impact Statement for Santa Clara Valley Water District's 800-kW Anderson Dam Hydroelectric Project in California.

**Issued twenty-six (26) notices to proceed with construction and service for natural gas infrastructure, including but not limited to:**

1. Authorized Venture Global Plaquemines LNG, LLC to introduce hazardous fluids to the liquid nitrogen production, storage, and vaporization system and into Liquefaction Block 15, and to commission the Phase 2 Acid Gas Removal Unit C at its LNG export terminal in Louisiana.
2. Authorized Venture Global CP2 LNG, LLC to commence construction on the outer concrete walls for the LNG storage tanks, to use ASTM-equivalent structural steel specifications to fabricate the liquefaction modules, and to commence construction of spill containment systems and the main administration building for the CP2 LNG Project in Louisiana.
3. Authorized Louisiana LNG Infrastructure LLC to commence installation of LNG Spill Containment Basin foundations for the Woodside Louisiana LNG project in Louisiana.

4. Authorized Port Arthur LNG Phase II, LLC to mobilize work crews and equipment and commence construction by installing a barred tee at the Port Arthur LNG facility in Texas.
5. Authorized Corpus Christi Liquefaction LLC to introduce feed gas and refrigerants to the cold end of Midscale Train 3 and hydrocarbons to the Train 3 condensate system for the Stage III Project in Texas.
6. Authorized Rio Grande LNG LLC to construct the fire and gas detection equipment in the Central Control Building and the Security Building, and to proceed with the development of final design to facilitate an interconnect with a non-jurisdictional intrastate pipeline its Rio Grande LNG Project in Texas.
7. Authorized a variance for Port Arthur LNG, LLC to modify the design for the addition of a Nitrogen Removal Unit at its Port Arthur LNG facility in Texas.
8. Authorized Northern Natural Gas Company to place into service the modifications associated with the Northern Lights 2025 Expansion Project at its existing La Crescent Compressor Station in Minnesota.
9. Authorized Commonwealth LNG, LLC to commence initial site preparation of its LNG terminal in Louisiana.

**Defended in Federal Courts FERC Orders under the Federal Power Act concerning rates, terms and conditions of the wholesale sale and interstate transmission of electricity, including but not limited to:**

1. *Montana-Dakota Utils. Co., et al. v. FERC* (8th Cir. No. 25-1007, et al.; FERC No. EL24-61, et al.) – Filed briefs in the U.S. Court of Appeals for the Eighth Circuit, in defense of Commission Orders addressing management of transmission congestion under joint operating agreement between regional transmission organizations.
2. *Independent Market Monitor for PJM v. FERC* (D.C. Cir. No. 24-1164; FERC No. EL23-45, et al.) – Presented oral argument to the U.S. Court of Appeals for the D.C. Circuit, in defense of Commission Order addressing access to meetings and information within the operating structure of a regional transmission organization.
3. *Solar Energy Industries Ass'n, et al. v. FERC* (D.C. Cir. No. 21-1126, et al.; FERC No. QF17-454) – Secured from the U.S. Court of Appeals for the D.C. Circuit opinion re-affirming, on remand from U.S. Supreme Court, Commission order on size eligibility for qualifying small power production facility under PURPA.

**Defended in Federal Courts FERC Orders under the Natural Gas Act concerning certificates authorizing natural gas pipeline construction and operation, including but not limited to:**

1. *Travis Dardar, et al. v. FERC* (D.C. Cir. No. 24-1291, et al.; FERC No. CP22-21) – Filed brief in the U.S. Court of Appeals for the D.C. Circuit, in opposition to motion to stay FERC authorizations pending judicial review on the merits.
2. *El Puente de Williamsburg, et al. v. FERC* (D.C. Cir. No. 23-1333; FERC No. CP23-518) – Secured from the U.S. Court of Appeals for the D.C. Circuit decision affirming Commission order allowing, in emergency circumstances, construction and operation of a short pipeline at existing LNG terminal in Puerto Rico.

**Completed two audits under the Federal Power Act:**

1. The Commission issued an Order on the results of its audit of Talen Energy Corporation and its subsidiaries, including Talen Energy Supply, LLC; Talen Energy Marketing, LLC; and Talen Generation, LLC (collectively, Talen Energy). The audit evaluated Talen Energy's jurisdictional wholesale electric market activity, including compliance with the tariffs of Independent System Operators/Regional Transmission Organizations and transmission owners in electricity markets in which Talen Energy participates. The audit identified three areas of noncompliance. Talen Energy agreed to implement the recommendations in the audit report.
2. The Commission issued an Order on the results of its audit of Pacific Gas and Electric Company (PG&E). The audit evaluated PG&E's compliance with approved terms, rates, and conditions of its wholesale transmission formula rate mechanism, approved terms, rates, and conditions of its wholesale distribution formula rate mechanism, accounting requirements of the Uniform System of Accounts, reporting requirements of the FERC Form No. 1, the requirements in Preservation of Records of Public Utilities and Licensees under 18 C.F.R. Part 125, the requirements of regulations governing nuclear plant decommissioning trust funds, and the requirements of Order Nos. 580, 580-A, and 658. The audit identified eight areas of noncompliance. PG&E agreed to implement the recommendations in the audit report.

We appreciate the opportunity to provide you with an overview of the diligent work the Commission does on behalf of the American people to ensure abundant, safe, reliable, and affordable energy for all consumers.

Sincerely,

David Rosner
Chairman

Cc: The Honorable Chris Wright, Secretary
Department of Energy

The Honorable Doug Burgum, Secretary
Department of Interior

The Honorable Russell Vought, Director
Office of Management and Budget

The Honorable Dr. Stuart Levenbach, Associate Director
Office of Management and Budget

Mr. Peter Lake
National Energy Dominance Council
The White House