

Full Report: Emissions, Health, and Financial Impacts of Trump's 202(c) Orders



Figure 1 – Map of plants that have received 202(c) orders from the Trump administration.

For over a year, the Trump administration has invoked [Section 202\(c\)](#) of the Federal Power Act, typically used in times of emergency, to force units at six aging coal plants and one natural gas plant to keep running. These plants had been slated for retirement through years of careful planning by utilities, state regulators, and grid operators. The administration overrode all of it.

A federal appellate court's decision on Friday, September 11, that the initial order requiring a Michigan coal plant was unlawful and that the Department of Energy's justifications for these orders do not meet legal requirements may be the first step in ending these orders and allowing the plants to retire. But these plants have already added hundreds of millions of dollars to families' electric bills and emitted thousands of tons of harmful air and water pollution, affecting the health of people living nearby and damaging the environment. To understand the full scope of the damage, we compiled data across all the affected plants subject to wrongful 202(c) orders. The picture that emerges is striking.

“Emergency” orders

The plants covered by these 202(c) orders span from Pennsylvania to Washington state (Figure 1). Despite being in different grid regions with varying reliability conditions, they share one thing in common: none of them were needed.

The Trump administration has justified these orders by claiming that the plants were needed for reliability purposes, such as providing much-needed electricity during winter snaps and other times of high electricity demands. In true instances of reliability crises, DOE uses 202(c) orders to grant a few hours or days of extended production and emissions during peak demand, or when utilities request to postpone the retirement of plants for the reliability of the grid. However, in all of these cases, none of the utilities asked DOE to extend their plants; in fact, a few utilities are actively fighting the orders so that they do not pass costs onto ratepayers.

Some plants’ combined duration of 202(c) orders are over 500 days (Figure 2). The J. H. Campbell and Eddystone coal plants have received five renewals of their original 202(c) orders, extending their retirements by well over a year.

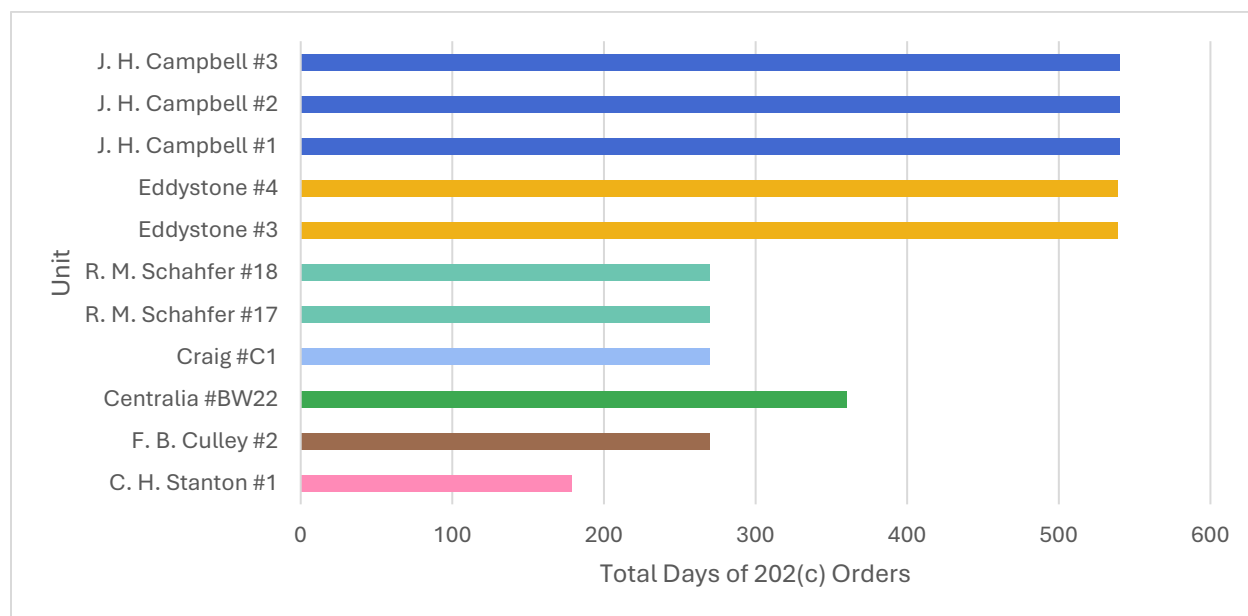


Figure 2 – Total days of 202(c) orders. Note that orders may run into the future, such that the units have not yet run for the time periods indicated in this figure. Dates and duration of 202(c) order as of September 14, 2026, sourced from U.S. DOE 202(c) order announcements for [2025](#) and [2026](#).

Our data shows the extent of the administration’s fabrication of a reliability crisis: many of these plants ran for a fraction of the time that they were ordered to remain available – indicated by a full shaded bar over the entire hatched bar (Figure 3). As of June 30, 2026, R. M. Schahfer unit 18 hasn’t even produced power since the Trump administration mandated it to stay open.

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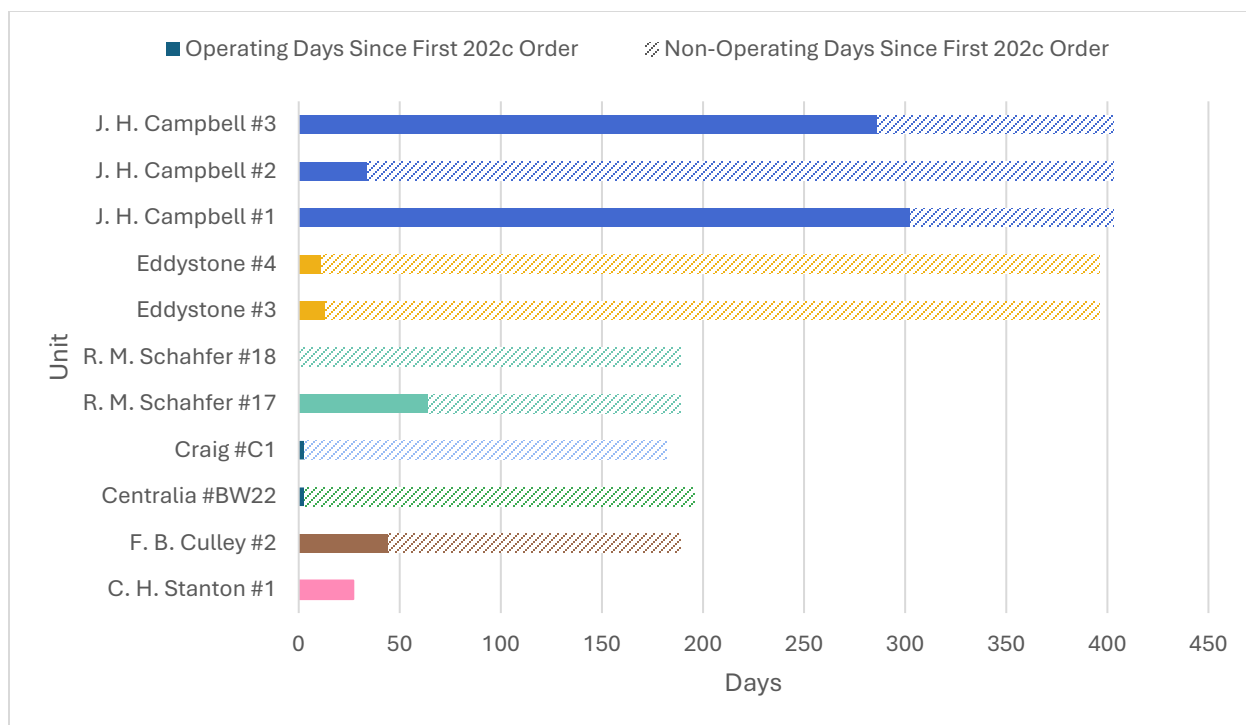


Figure 3 – Operating days since first 202(c) order vs. non-operating days. Operating days as of June 30, 2026, sourced from [EPA's Clean Air Markets Program Data \(CAMPD\)](#). Dates and duration of 202(c) order as of September 14, 2026, sourced from U.S. DOE 202(c) order announcements for [2025](#) and [2026](#).

Section 202(c) is supposed to be a last resort — invoked only to address imminent, unexpected grid shortfalls, and limited to the minimum operation necessary. A plant that produces no power while operating under an emergency declaration isn't evidence of a grid crisis. It's evidence of a manufactured one.

The Craig plant has compounded the abuse of DOE's emergency powers with abuse of Clean Air Act authority. Public interest groups [have argued](#) that DOE's orders exceeded their statutory authority and amounted to unlawful preferential treatment for coal-fired power. On top of that, the administration [granted](#) the Craig plant a Clean Air Act exemption, meaning that it is exempted from having to comply with Clean Air Act regulations that protect human health by limiting its emissions of mercury, particulate matter, and other harmful air pollutants. Despite the plant's original retirement date in December 2025, this exemption was issued in July 2025 and is in effect through July 2027. Even the owner of the plant [has formally opposed](#) the plant's retirement postponement, citing the increased costs they would pass onto ratepayers. As of the time of this writing, the plant has received back-to-back 202(c) orders to stay online through September 26, 2026.

Ratepayers are on the hook

Amidst concerns of Americans that electricity bills are going up, the Trump administration is prolonging the life of uneconomic fossil fuel plants that ultimately pass costs back onto everyday Americans. There's a reason why these plants were scheduled to close—they are

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uneconomical, driven by the high fuel cost of coal, low efficiency, and high costs of operation and maintenance. In all these cases, coal plants are being forced to stay open and produce little to no electricity at high costs, which are ultimately paid back by ratepayers.

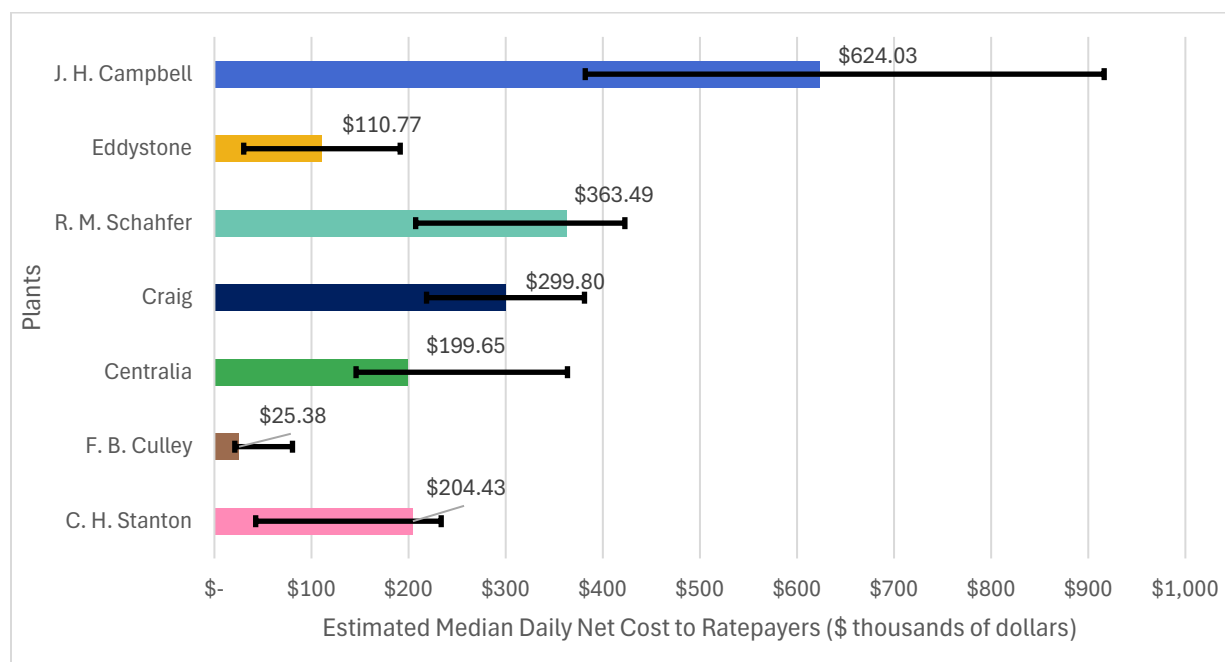


Figure 4 - Estimated median net costs per day to ratepayers in thousands of U.S. dollars. Minimum and maximum estimates are designated by the black error bars.

Consumers in the Midcontinent Independent System Operator (MISO) region alone are on the hook for over \$250 million in additional costs through the end of June 2026 – over \$600,000 a day – to keep the J.H. Campbell plant running (Figure 4). That cost is spread across 11 states, meaning consumers as far away as Kentucky will be paying for the Michigan plant to stay online. The F. B. Culley and R. M. Schahfer plants are also in the MISO region, meaning that MISO consumers' electricity bills could further increase if these plants are likewise permitted to pass along the cost of staying online to the consumers. will be paying for the Michigan plant to stay online. The F. B. Culley and R. M. Schahfer plants are also in the MISO region, meaning that MISO consumers' electricity bills could further increase if these plants are likewise permitted to pass along the cost of staying online to the consumers.

In the Pacific Northwest, keeping the Centralia Plant open in Washington state for just the first 90 days of 2026, during which it didn't produce a single megawatt of electricity, could cost ratepayers approximately \$20 million in additional costs, or over \$220,000 per day (Figure 4). Costs will also be shared amongst ratepayers for the Eddystone plant in the Pennsylvania, New Jersey, and Maryland (PJM) region, according to a recent Federal Energy Regulatory Commission ruling. All told, Americans across the country will pay over \$400 million to keep these plants open over this past year, even if they aren't producing electricity, are causing severe air pollution, and are not commercially viable.

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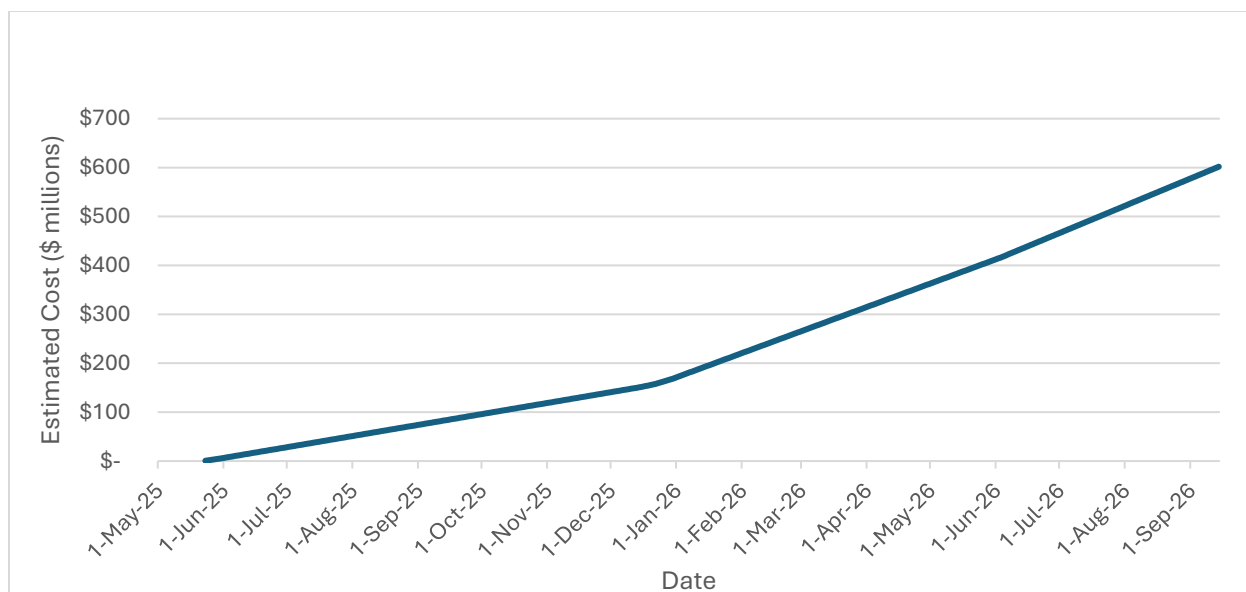


Figure 5 - Estimated Total Net Cost to date (as of September 14, 2026) of Emergency Orders based on estimated median costs per day of each plant shown in Figure 4.

Who pays with their health

Keeping these plants running hasn't just cost ratepayers money--it has also come at an environmental and public health cost.

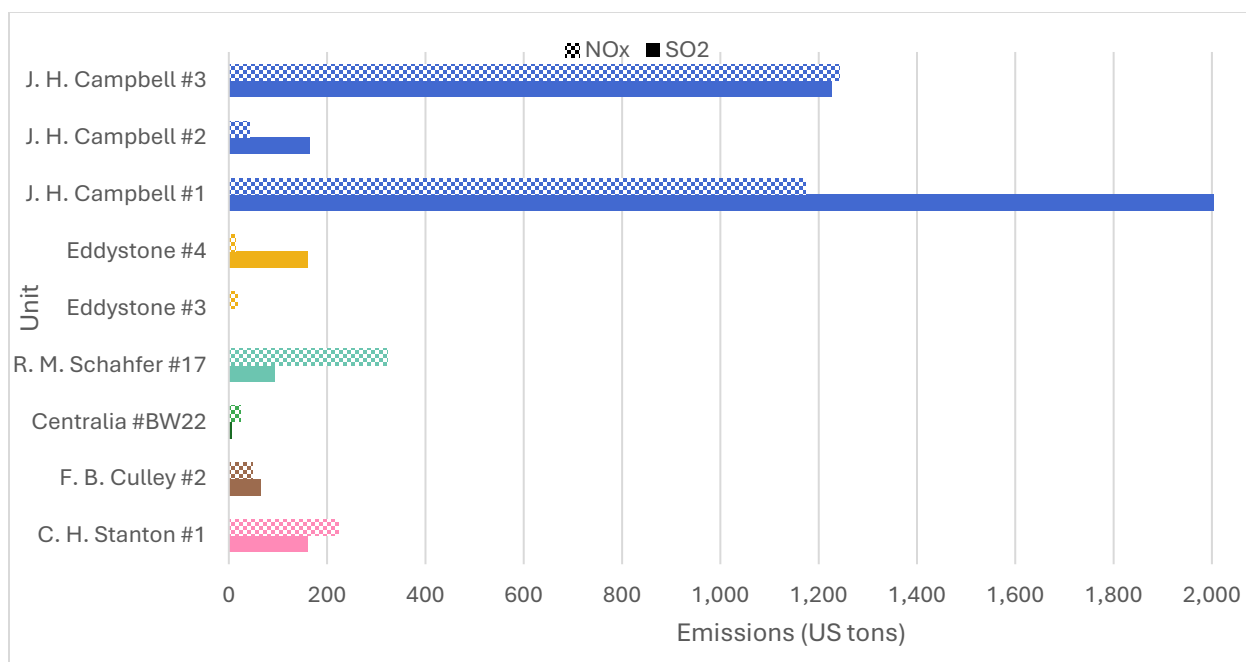


Figure 5 – NO_x and SO₂ emissions by plant since 202c order issuance. Data is limited to only plants that have been operating since their 202(c) order issuance. Data as of June 30, 2026 from [CAMPD](#).

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These plants have emitted thousands of tons of nitrous oxides (NO_x) and sulfur dioxide (SO₂) (Figure 5) and hundreds of pounds of fine particulate matter (PM_{2.5}) (Figure 6) during the course of their 202(c) orders. SO₂ and NO_x have well-documented [effects on respiratory health](#), such as exacerbated asthma and increased vulnerability to respiratory infections. PM_{2.5} is especially harmful to human health as it can penetrate deeper into the lungs and cause heart attacks, strokes, heart issues, lung disease, and cancer.

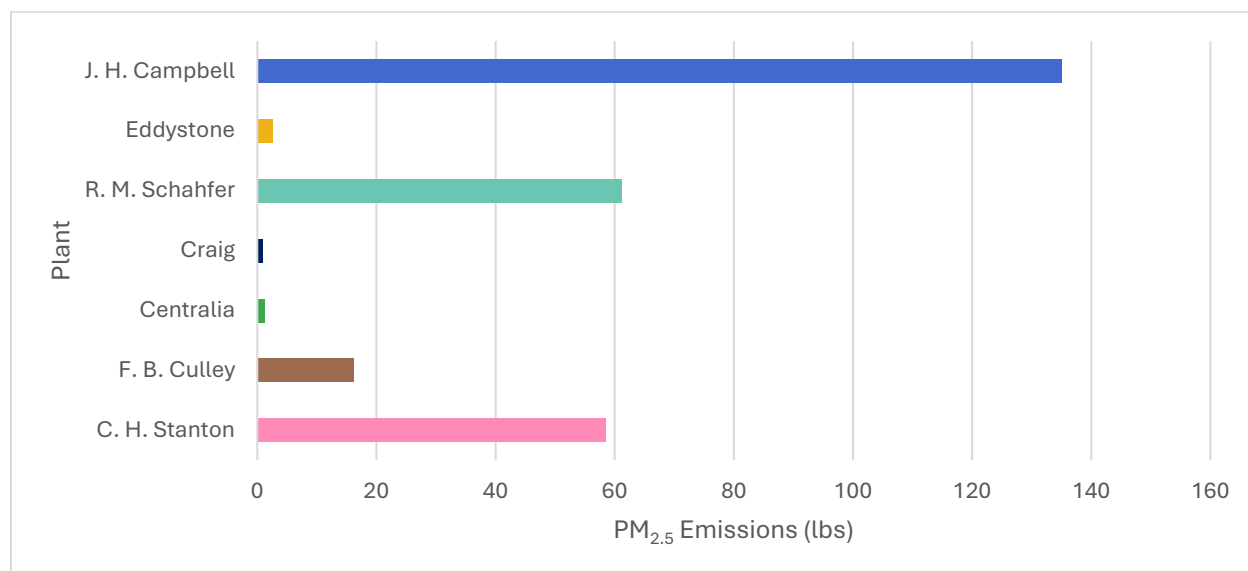


Figure 6 – PM_{2.5} emissions by plant since 202(c) order issuance. Data is limited to only plants that have been operating since their 202(c) order issuance. Data as of June 30, 2026 from [CAMPD](#).

The J. H. Campbell plant in Michigan has emitted the most NO_x, SO₂, and PM_{2.5} by far. This is because it has run the most days compared to other plants who have received 202c orders. By June 30, 2026, J. H. Campbell unit 1 alone generated well over 1,000 US tons of NO_x and over 2,000 tons of SO₂ (Figure 5). During this period, the J. H. Campbell plant as a whole emitted almost 140 lbs of PM_{2.5} (Figure 6).

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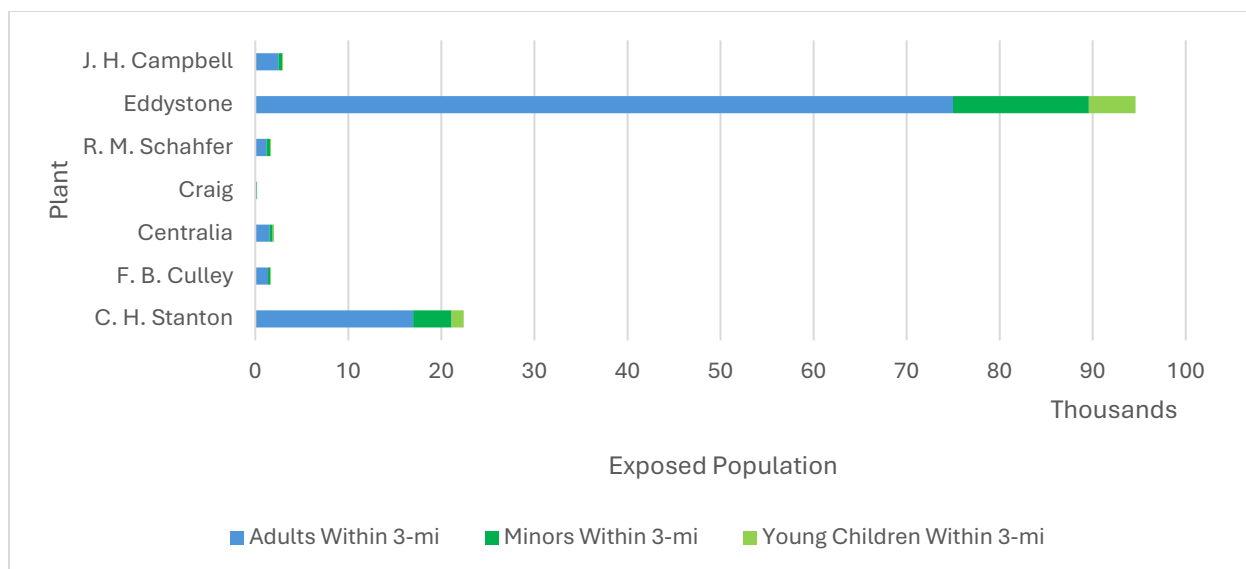


Figure 7 – Population living within a 3-mile radius of a facility. Data from EPA’s Enforcement and Compliance History Online (ECHO), as of June 1, 2026. Age categories are exclusive of each other. “Adults” refers to persons ages 18 and older, “minors” refers to children ages 6 to 17, and “young children” refers to children under age 5.

These emissions have local consequences. Over 160,000 people live within three miles of these facilities, including more than 8,700 children under the age of five (Figure 7). The most densely populated site is the [Eddystone plant](#) in Pennsylvania where over 94,000 residents live in the surrounding area, among them more than 5,000 young children.

Communities near these plants face elevated exposure to toxic pollution from units that their utilities, state regulators, and grid operators had already determined were no longer needed for grid reliability. However, their health impacts are felt across the country, as emissions disperse across state lines. Compared to if these plants had retired on their original retirement dates, these emissions have caused between 33 to 59 premature deaths, 46 emergency room visits for respiratory distress, 132 new cases of asthma, 7,548 missed school days, and 2,697 missed workdays together totaling between \$530 to \$901 million in 2023 USD (Figure 8).

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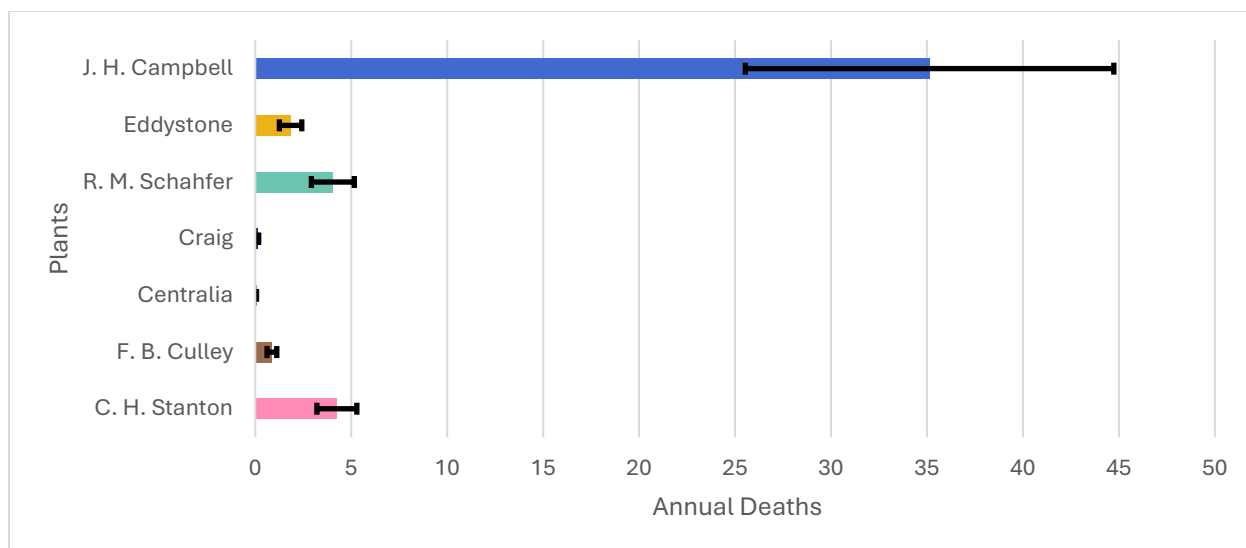


Figure 8 – Annual deaths related to emissions from plants operating during their 202c ordered periods. Estimates calculated using EPA's Co-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA). Bars represent median estimates while black error bars denote minimum and maximum estimates.

This has to stop – and we're fighting to make it happen

The Trump administration's Section 202(c) orders aren't emergency measures. They are a systematic effort to prop up an uneconomical industry at the public's expense; in dollars, in health, and in lives. Every day these orders remain in effect, communities near these plants breathe dirtier air, families pay higher electricity bills, and children under five bear the health burden of a political decision made on their behalf without their consent.

EDF and our partners are challenging these orders in court. The legal case is strong: plants that sit idle for hundreds of days under "emergency" mandates, while simultaneously receiving exemptions from health-protective pollution rules, expose the hollow justification behind these orders. Courts have tools to stop this — and we are using them.

You can look into the dataset yourself, [here](#), and read our methodology, [here](#).

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