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General Comment

Comment on EIA–860S: State Level Generator Air Permit Inventory Report

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Submitted by: Private Citizen

Comment

I am submitting this comment as a private citizen with professional experience in air quality permitting and electric generation systems. The views expressed herein are my own and do not represent the position of any organization or employer.

The March 6, 2026 Federal Register notice correctly identifies a critical gap in national energy planning: incomplete data on backup and emergency generators creates a “substantial void” in understanding total U.S. grid capacity and resilience, particularly under conditions of rapidly increasing electricity demand.

This issue is especially relevant given recent increases in electricity demand associated with artificial intelligence infrastructure and extreme weather events, as well as the increasing frequency of emergency orders issued under section 202(c) of the Federal Power Act.

Recommendation: General Permit Pathways for Controlled Extended Operation

As EIA improves visibility into the population of backup generators through the EIA–860S data collection, I recommend that EIA coordinate with the U.S. Environmental Protection Agency (EPA) and state air permitting authorities to evaluate the feasibility of general permit frameworks that would allow a subset of these generators to operate for limited additional hours under controlled conditions.

Such general permits would provide a structured, enforceable pathway for certain emergency generators to operate for up to approximately 4 hours per day during peak demand periods (e.g., summer and winter peaks) over a limited timeframe (e.g., the next 3 years), while new generation capacity is developed.

Proposed Technical Eligibility Criteria

Eligibility for such general permits could be limited to generators that implement enhanced environmental controls and monitoring, such as:

High-efficiency particulate matter (PM) control technologies, including filtration systems capable of achieving very low primary PM emissions;
NOx control systems, such as Selective Catalytic Reduction (SCR) or equivalent technologies;
Continuous or near-continuous emissions monitoring, including:
PM monitoring (e.g., PM CEMS or equivalent),
NOx monitoring,
Ammonia slip monitoring where SCR is used;
Defined operational limits, including:
Maximum daily runtime limits (e.g., up to 4 hours/day),
Applicability during declared peak demand conditions,
Recordkeeping sufficient to support both regulatory oversight and EIA data integration.
Purpose and Policy Value

The purpose of this approach would be to enable controlled, temporary use of existing generator capacity as a bridge during a period of:

Rapid growth in electricity demand,
Delays in bringing new utility-scale generation online,
Increased stress on grid reliability.

Importantly, this approach would ensure that any expanded use of diesel generators occurs under transparent, monitored, and enforceable environmental safeguards, rather than through ad hoc or emergency-only mechanisms.

Alignment with EIA–860S Objectives

This recommendation supports the objectives of the EIA–860S effort by:

Enhancing the practical utility of collected data (identifying not just generators, but those capable of controlled operation);
Supporting informed policy decisions at the federal and state level;
Improving understanding of dispatchable backup capacity under realistic operating scenarios;
Reducing the risk of uncontrolled emissions impacts associated with emergency generator use.
Conclusion

The EIA–860S initiative is a necessary and timely effort to better understand the true composition of the U.S. electric generation fleet. Pairing this improved data collection with targeted, technology-based permitting pathways would allow policymakers to responsibly leverage existing assets to support grid reliability in the near term, while maintaining appropriate environmental protections.

Thank you for the opportunity to provide this comment.

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