

State of West Virginia
Office of the Attorney General

John B. McCuskey

Attorney General



State of North Dakota Office of the Attorney General *Drew Wrigley* Attorney General



State of Wyoming
Office of the Attorney General
Bridget Hill
Attorney General

March 20, 2025

The Honorable Doug Burgum Secretary Department of the Interior 1849 C Street, NW Washington DC 20240

Dear Secretary Burgum:

We write in support of your recent comments that America has "got to keep every coal plant open" and "bring ... back" "units at a coal plant that have been shut down." We strongly endorse your suggestion that President Trump should restart any recently shuttered plants as part of the national energy emergency declaration. And we are ecstatic that President Trump announced just days ago that he is "authorizing [his] Administration to immediately begin producing Energy with BEAUTIFUL, CLEAN COAL." America needs coal power to succeed.

For years, our national energy grid has been under tremendous pressure. Many factors are pushing energy demand up: a growing population, an increasingly electrified vehicle fleet, exploding use by data-storage centers and crypto mining, and more. Yet the Biden administration aggressively and shortsightedly implemented anti-fossil fuel policies that pushed energy supply down.³ The result is the lowest level of coal production since 1960—at a time when grid reliability is in a precarious state.

America's energy pressure can be eased only by unleashing fossil-fuel energy sources—including coal. As President Trump noted in Executive Order 14156 (which declared a national energy emergency), restoring and revitalizing our traditional energy sources and infrastructure is crucial to ensuring domestic growth and international security.⁴ And coal provides what America needs: reliability, key baseload capacity, an established infrastructure, lower costs, domestic availability, and ready dispatchability.⁵

Harnessing fossil fuel energy, including coal-fired power is the only way for America to confront 21st Century challenges—like artificial intelligence, for example. As you recognized in your order

¹ Doug Burgum, US Considers Emergency Powers to Restart Closed Coal Plants, BLOOMBERG (Mar. 10, 2025), https://bloom.bg/41KA5kJ.

² Donald J. Trump (@realDonald Trump), Truth Social (Mar. 17, 2025 6:36 PM), https://bit.ly/4c2OkGf.

³ See West Virginia, et al., Comment Letter on Proposed Greenhouse Gas Rule (Aug. 17, 2023), https://bit.ly/3R6AVTZ.

⁴ Exec. Order 14156, 90 Fed. Reg. 8433 (Jan. 20, 2025), https://bit.ly/3FmALFp.

⁵ COAL = RELIABLE ENERGY, NAT'L COAL COUNCIL (2015), https://bit.ly/3RaLJ3m.

implementing EO 14156, developing artificial intelligence is critical.⁶ In American hands, AI has the potential to further the common good—to "expand[] knowledge, increase[] prosperity and enrich[] the human experience." But if "current trends do not change," "China possesses the might, talent, and ambition to surpass the United States as the world leader in AI."8 Coal could help change that. AI success needs three things: "chips, data, and electricity." But we might soon lack adequate electricity, as American AI energy consumption is expected to increase dramatically over the next five years. 10 Without increased coal-fired energy production, we will not be ready to meet this spike in "power demand." Renewable energy sources, for instance, have so far proven to be too unreliable¹² and weak to supplant lost fossil fuels.¹³ Indeed, the North American Electric Reliability Corporation projects that, unless something is done now, large swaths of our country will not have a reliable power grid as soon as this year, even during normal conditions.¹⁴

AI is but one example of how America needs coal to power our continuing global competitiveness in the coming age. For instance, if America is going to revitalize its manufacturing sector, we need coal power to support those energy-intensive operations in key areas (e.g., steel, aluminum, chemicals, and automotive). If America is going to remain independent, it needs to leverage domestic coal resources to reduce reliance on imported energy.¹⁵ And if America is going to continue to lead the way in other forms of tech development (like semi-conductor manufacturing and quantum computing), it will need substantial amounts of stable power—power that coal can provide.

Reasons like these explain why we support efforts to promote coal-fired energy production contained in EO 14156, President's Trump's recent pronouncements, your Department's Order No. 3417, recent related actions by the Environmental Protection Agency, your recent public comments, and the use of all powers (emergency or otherwise) that will sustain coal-fired power plants. We are in an energy crisis, and if we fail to "meet[] the power demands of [the AI] industry" and other key sectors, we could lose the ability to "remain at the forefront of technological innovation" and would face increasing threats to our "prosperity and national security." ¹⁶ But we can win. Let's unleash American coal to help power a new era of American prosperity and peace.

Sincerely,

John B. McCuskey

West Virginia Attorney General

Drew Wrigley

North Dakota Attorney General

⁶ U.S. DEP'T OF INTERIOR, ORDER NO. 3417 (Feb. 3, 2025); see also Graham Allison & Eric Schmidt, Is China Beating the U.S. to AI Supremacy?, PROJECT SYNDICATE (Aug. 2020), https://bit.ly/3R6vhRK; see also, e.g., NAT'L SEC. COMM'N ON A.I. FINAL REPORT 14 (2021), https://bit.ly/4hwYzDQ. NAT'L SEC. COMM'N ON A.I., FINAL REPORT 7 (2021), https://bit.ly/4hwYzDQ.

⁹ Cy McGeady et al., The Electricity Supply Bottleneck on U.S. AI Dominance, CSIS (Mar. 3, 2025), https://bit.ly/3XMHuyI.

¹⁰ *Id*.

¹² See, e.g., Patricia Patnode, Hailstorm exposes vulnerabilities in solar infrastructure: A wake-up call from Texas, COMPETITIVE ENTER. INST. (Apr. 2, 2024) https://bit.ly/3R4CCRS.

¹³ Energy and the Environment: Renewable Energy and Electricity, WORLD NUCLEAR ASS'N (last updated May 17, 2024), https://bit.ly/4iMrQvl.

¹⁴ NERC, 2024 LONG-TERM RELIABILITY ASSESSMENT 6 (Dec. 2024), https://bit.ly/4j0vD8s.

¹⁵ Joe Hernandez, The U.S. buys electricity from Canada. Now it's a focus of the trade war, NPR (Mar. 12, 2025, 7:32 p.m.), https://bit.ly/41T0Jb7.

¹⁶ U.S. DEP'T OF INTERIOR, ORDER NO. 3417 (Feb. 3, 2025).

Bridget Hill

Bridget Hill Wyoming Attorney General

Steve Marshall Alabama Attorney General

Tim Griffin Arkansas Attorney General

James Uthmeier Florida Attorney General

Christopher M. Carr

Georgia Attorney General

Raúl Labrador Idaho Attorney General

Todd Rokita

Indiana Attorney General

Brenna Bird Iowa Attorney General

Russell Coleman Kentucky Attorney General

Liz Murrill Louisiana Attorney General

Lynn Fitch Mississippi Attorney General

Andrew Bailey Missouri Attorney General auto Whol

Austin Knudsen Montana Attorney General

Mike Hilgers Nebraska Attorney General

Mike Hila

Man Wilson

Gentner Drummond Oklahoma Attorney General

Alan Wilson South Carolina Attorney General

Marty J. Jackley South Dakota Attorney General

Jonathan Skrmetti Tennessee Attorney General and Reporter

Ken Paxton Texas Attorney General

Derek Brown Utah Attorney General

Jason S. Miyares Virginia Attorney General