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PORTS Feasibility

Executive Summary

PORTS should be scored as a weak but not impossible project. The public record supports a serious development effort at Piketon; it does not support the announced 9.2 GW / 10 GW buildout as deliverable on the stated schedule.

Verdict

SoftBank PORTS is not yet a delivery-ready 10 GW AI campus. It is a politically powerful, infrastructure-rich concept whose documented path supports only a much smaller, phased project until power, fuel, transmission, water, and cost-allocation evidence becomes public.

Overall feasibility score: 3.1 / 10
Stage tag: Pre-permitting (Announced)
Last reviewed: May 29, 2026
Evidence as of: May 29, 2026
One-sentence recommendation: Treat the announced 9.2 GW gas plant / 10 GW data-center campus as weak as stated; the only plausible near-term posture is a gated first phase that proves firm power, water, permitting, and ratepayer insulation before scale is credited.

Claim mean 3.1 · controlling claim (firm power deliverability plus project-specific cost allocation) 3.0 → cap 4.5 · published overall 3.1.

The question is not whether Piketon has strategic advantages. It does: DOE land, existing high-voltage infrastructure, AEP Ohio participation, federal sponsorship, and a local economic-development narrative that many communities would envy. The question is whether those advantages substantiate the claim being made: a $33.3 billion, 9.2 GW natural-gas plant paired with a 10 GW AI data center, with an initial $10 billion / 800 MW phase online around 2028 and broader progress before January 2029. On the public record, they do not.

For power, schedule, connectivity, and cost priorities, **the best-supported candidate is not the full PORTS buildout but a smaller first-phase Piketon campus gated to proven energization and cost allocation.** Piketon's location near 765 kV and 345 kV infrastructure is a real differentiator, but it does not prove available headroom for 9.2 GW. The single biggest risk is **firm power deliverability with cost allocation**: turbines, gas supply, PJM/AEP transmission, OPSB approvals, and ratepayer hold-harmless treatment all have to work together. Failure in that chain collapses the schedule, economics, and public compact.

This is a feasibility-grade public-record assessment, not investment, legal, engineering, or environmental advice. It does not replace executed agreements, interconnection studies, permit records, utility service commitments, or counsel review.

Single biggest risk

The controlling claim is **firm power deliverability plus project-specific cost allocation**. PORTS needs to prove that SB Energy and its counterparties can deliver a 9.2 GW gas-backed

power system, procure roughly 1.2 Bcf/day of gas at high utilization, complete PJM/AEP transmission and interconnection approvals, and isolate incremental costs from ordinary consumers.

The clearing evidence is specific and public-record testable:

- executed turbine / EPC / long-term service agreements with delivery dates and price protections;
- firm gas transportation and supply commitments, including pipeline route and filing path;
- PJM interconnection or load-service milestones and network-upgrade cost assignment;
- OPSB approval, route resolution, procurement, and energization schedule for the AEP transmission program;
- a PORTS-specific tariff, special contract, PUCO order, or equivalent mechanism showing who pays for generation, transmission, network upgrades, abandonment, and delay costs.

Until that package exists, the 9.2 GW / 10 GW claim remains in the intent-to-early-process band, not the proof band.

Where the story diverges

What the operator and public sponsors say

Public announcements frame PORTS as a nationally strategic U.S.–Japan AI and energy campus. The project is led by SB Energy, a SoftBank Group subsidiary, with federal sponsorship tied to DOE land near Piketon, Ohio. Public materials describe a planned 10 GW data-center campus supported by 10 GW of new power generation, including at least 9.2 GW of natural-gas generation. The announced gas plant is priced at roughly $33.3 billion; the first data-center phase is described as a $10 billion, 800 MW investment; and AEP Ohio is associated with roughly $4.2 billion of new transmission infrastructure across southern Ohio.

Federal officials named in the announcement include Energy Secretary Chris Wright, Commerce Secretary Howard Lutnick, and DOE Assistant Secretary Tim Walsh. SoftBank CEO Masayoshi Son and SB Energy are the private-sector faces of the plan. Local and state supporters, including Ohio State Sen. Shane Wilkin and Pike County Commissioner Tony Montgomery, have framed the project as a generational redevelopment opportunity for a rural Appalachian community long associated with the former Portsmouth Gaseous Diffusion Plant.

What is actually there

The public evidence is materially thinner than the announcement. DOE and AEP materials support intent and early process. They do not prove turbines, air permits, PJM interconnection approval, gas-pipeline capacity, OPSB certificate approval, water supply, NPDES / thermal-discharge permits, ratepayer insulation, or workforce mobilization.

The 2028 schedule is especially exposed. AEP's public messaging indicates power is expected to begin flowing to the site in 2029, while the announced first data-center phase points to 2028. That mismatch does not make a 2028 phase impossible, but it prevents the public record from supporting it as delivery-ready.

Project profile

Project: SoftBank PORTS Technology Campus
Location: Former Portsmouth Gaseous Diffusion Plant near Piketon, Pike County, Ohio
Developer / sponsor: SB Energy, a SoftBank Group subsidiary, in partnership with federal sponsors and DOE land-reuse authorities
Publicly named stakeholders: SoftBank Group / Masayoshi Son; SB Energy; U.S. Department of Energy; Energy Secretary Chris Wright; Commerce Secretary Howard Lutnick; DOE Assistant Secretary Tim Walsh; AEP Ohio; PJM Interconnection; GE Vernova; Pike County officials; Ohio legislators; Government of Japan
Power strategy: Grid-connected gas-backed campus; announced 9.2 GW natural-gas generation component
Data-center scale: Proposed 10 GW AI campus; announced first phase of roughly 800 MW and $10 billion
Transmission: Publicly described $4.2 billion AEP Ohio transmission investment, including new high-voltage infrastructure in southern Ohio
Fuel requirement: About 1.2 Bcf/day of natural gas at roughly 90% utilization for a 9.2 GW gas fleet, compared with Ohio production of roughly 5.9 Bcf/day in 2024 as cited in the project record
Site history: Former DOE uranium-enrichment site; enrichment ran from 1954 to 2001; site is in ongoing demolition, deactivation, and remediation
Financing frame: Tied publicly to the U.S.–Japan investment framework and SoftBank's multi-decade investment narrative; no project-specific financing term sheet is public in the evidence reviewed

Claim scorecard

Legend: Score measures feasibility of the claim. Confidence measures maturity of the public evidence. A low score with high confidence means the public record strongly supports an adverse feasibility read; a mid score with low confidence means the idea is plausible but not yet proven.

#	CLAIM	SCORE	CONFIDENCE	ONE-LINE READ
1	9.2 GW gas plant and turbine supply can be built as scoped	**3.5**	Meaningful but qualified	DOE/AEP intent is real; public proof of turbine delivery, EPC, air permits, construction, or 9.2 GW energization is absent.
2	Construction begins in 2026 and 800 MW is online by 2028	**2.0**	Meaningful but qualified	Not credible as stated on current permit evidence; DOE, NEPA, PJM, OPSB, water, air, and local approvals are not integrated.
3	About 1.2 Bcf/day of gas can be procured and delivered	**3.0**	Preliminary	Regional gas context helps, but no pipeline filing, firm transport, route, compressor plan, or fuel contract is public.
4	PJM interconnection and AEP transmission can support the schedule	**4.0**	Meaningful but qualified	Existing high-voltage density and AEP participation help; PJM approval, OPSB approval, construction, and energization remain unproven.

#	CLAIM	SCORE	CONFIDENCE	ONE-LINE READ
5	Consumers will be protected from electricity and gas bill increases	**3.0**	Meaningful but qualified	AEP Ohio tariff precedent is relevant, but PORTS-specific cost assignment and stranded-cost protection are not public.
6	The project remains economically and politically durable	**3.5**	Meaningful but qualified	Federal and U.S.–Japan sponsorship is strong; economics, financing, gas exposure, and post-2029 political continuity are weakly proven.
7	Site and water issues can be managed without material complications	**3.0**	Meaningful but qualified	Water source, cooling design, discharge permits, floodplain design, and DOE remediation interface are unresolved.
8	The region can supply the workforce ramp	**2.5**	Preliminary	A 35,000-worker peak would be a multi-state mobilization event; no housing, transport, labor, or training plan is public.

Claim-by-claim assessment

Claim 1 — Power delivery and turbine supply

Falsifiable proposition: SB Energy can build the announced 9.2 GW gas plant as scoped, including turbine supply, permitting, construction, and delivery on a schedule compatible with the data-center campus.

Supporting evidence. DOE public materials state that SoftBank Group and SB Energy plan 10 GW of new power generation in Ohio, including at least 9.2 GW of natural-gas generation, to support a 10 GW data-center development. AEP has announced a major transmission buildout tied to the site. The region also has meaningful high-voltage infrastructure: transmission mapping around Piketon shows 765 kV and 345 kV assets in the broader area, including Ohio Power / AEP-related infrastructure.

Contradicting evidence. Public intent is not turbine proof. No executed turbine supply agreement, EPC notice to proceed, long-term service agreement, Ohio EPA major-source air permit, PJM interconnection milestone, construction start, or operating generation evidence was identified. Public reports that SoftBank has reserved turbines from multiple sources, including GE Vernova, do not establish delivery slots, pricing, liquidated damages, or equipment availability for a 9.2 GW fleet.

Assessment. The claim receives limited credit for sponsor seriousness, DOE land context, AEP involvement, and grid-proximity advantages. It remains weak because the decisive evidence—turbines, air permits, interconnection, gas, and construction—has not entered the public proof record.

Confidence: Meaningful but qualified
Score: 3.5 / 10

Claim 2 — Timeline

Falsifiable proposition: Construction begins in 2026, the first 800 MW data-center phase is online by 2028, and the broader project advances meaningfully before January 2029.

Supporting evidence. The project has unusually strong public sponsorship. DOE, Commerce, SoftBank, SB Energy, AEP Ohio, and state/local economic-development actors have all been associated with the announcement. A federal land-reuse setting can compress some site-control questions relative to a multi-owner greenfield assemblage.

Contradicting evidence. The approval stack is not permit-ready. A plausible 800 MW phase still has to reconcile DOE land-use and cleanup controls, likely NEPA review, PJM/AEP load-service and network upgrades, OPSB transmission proceedings, Ohio EPA air and water

permits, ODNR water withdrawal or consumptive-use requirements, local (source on file) approvals, and construction logistics. AEP's public transmission schedule pointing to 2029 power flow also undercuts any claim that 2028 power availability is already solved.

Assessment. The 2028 claim is the weakest claim in the scorecard. The credible case is staged progress—not 800 MW commercial operation on the stated schedule absent extraordinary evidence. A reduced first phase, temporary bridge power, or redefinition of "online" could narrow the gap, but none of those are public proof of the announced claim.

Confidence: Meaningful but qualified
Score: 2.0 / 10

Claim 3 — Gas supply adequacy

Falsifiable proposition: The project can procure and deliver roughly 1.2 Bcf/day of gas for a 9.2 GW gas plant at high utilization through contracts and pipeline infrastructure compatible with the project schedule.

Supporting evidence. Ohio sits in a gas-producing region with access to Appalachian supply dynamics. The project record cites Ohio production of roughly 5.9 Bcf/day in 2024, so the state-level resource context is not barren.

Contradicting evidence. A 1.2 Bcf/day requirement is system-scale. No public plant filing, gas lateral route, pipeline expansion filing, FERC or state-jurisdictional certificate path, firm transportation contract, storage plan, compressor plan, or fuel-supply agreement was identified. At the financial level, each $1/MMBtu change in gas price on roughly 438 million MMBtu/year creates about $438 million per year of exposure before hedging or pass-through design.

Assessment. The project may be able to solve gas supply with a large enough commercial package. The public record does not yet show that package. The score stays weak until supply, transportation, routing, permitting, and price-risk allocation are visible.

Confidence: Preliminary
Score: 3.0 / 10

Claim 4 — Grid interconnection and transmission

Falsifiable proposition: PORTS can secure PJM interconnection or load-service approval and build the AEP transmission upgrades, including the roughly 50-mile line referenced in project materials, on a schedule compatible with the data-center timeline.

Supporting evidence. Piketon's grid geography is a real advantage. Public transmission datasets show major voltage classes in the vicinity, including 765 kV infrastructure. AEP has publicly announced a $4.2 billion transmission investment tied to the project and a pathway for power to begin flowing to the site in 2029.

Contradicting evidence. Transmission density is not headroom. No project-specific PJM approval, completed study, interconnection service agreement, network-upgrade assignment, OPSB certificate, final route, energization evidence, or appeal-free approval was identified. OPSB Case No. 26-0426 should be treated as an early process marker, not as approval. Public comments and corridor concerns remain important watch items, particularly where farms, landowners, or Amish communities may be affected by linear infrastructure.

Assessment. This is the strongest of the infrastructure claims because the location and AEP posture are real. It still scores only 4.0 because it remains a process claim, not a proof claim.

Confidence: Meaningful but qualified
Score: 4.0 / 10

Claim 5 — Consumer cost protection

Falsifiable proposition: Electricity and gas consumers will be shielded from PORTS-driven generation, transmission, interconnection, fuel, abandonment, and delay costs.

Supporting evidence. AEP Ohio's data-center tariff framework is relevant. AEP has stated that large new data-center customers must pay for a minimum share of subscribed energy under its tariff structure, and the PUCO-approved framework is designed to reduce cost shifting from large loads to other customers. DOE and AEP public messaging also emphasizes that SB Energy would pay for project-related transmission infrastructure.

Contradicting evidence. A general tariff framework is not a PORTS-specific cost-allocation order. The public record reviewed does not prove that all generation, transmission, PJM upgrades, gas infrastructure, reliability costs, stranded-asset exposure, and schedule-slip costs are ring-fenced away from ordinary consumers. The needed protections are concrete: direct assignment of network upgrades, contributions in aid of construction, parent guarantees, collateral, exit fees, minimum terms, take-or-pay obligations, and abandonment protection.

Assessment. The concept is plausible; the proof is missing. The claim cannot score above the weak band until a PORTS-specific tariff, special contract, PUCO order, or comparable binding mechanism is public.

Confidence: Meaningful but qualified
Score: 3.0 / 10

Claim 6 — Economic and political durability

Falsifiable proposition: PORTS remains economically viable at the announced capital intensity and politically durable beyond the current federal alignment.

Supporting evidence. The project has rare top-cover: SoftBank, DOE, Commerce, AEP Ohio, and the U.S.–Japan investment frame. Federal land reuse also gives the sponsor a clearer

development narrative than a speculative greenfield site. Local officials in Pike County and southern Ohio have a strong economic-development incentive to support job creation and reuse of the PORTS site.

Contradicting evidence. The visible capital stack is severe. The gas plant alone implies roughly $3,600/kW before the $4.2 billion transmission plan and the $10 billion first data-center phase. A cost-only illustrative case using $47.5 billion of visible capex and annual operating / fuel exposure produces a deeply negative present-value burden absent contracted revenue or explicit cost recovery. That is not a project-finance conclusion; it is a reminder that someone must contractually absorb tens of billions of dollars of capital and fuel risk. Politically, the project crosses the January 2029 federal-transition boundary before many approvals could be locked.

Assessment. Sponsorship and strategic importance lift the claim above "not credible," but not into substantiated territory. Economic durability requires executed capital, offtake, tariff, turbine, gas, and permit evidence. Political durability requires approvals and community commitments that survive a change in federal priorities.

Confidence: Meaningful but qualified
Score: 3.5 / 10

Claim 7 — Site suitability and water

Falsifiable proposition: The former Portsmouth Gaseous Diffusion Plant site can support PORTS with reliable water supply and safe operation despite nuclear-site legacy, active remediation, floodplain, and environmental constraints.

Supporting evidence. The Portsmouth site is a large established federal industrial property, historically totaling more than 3,700 acres. It is not a small, fragmented assemblage. Nearby hydrology is real: USGS monitoring includes the Scioto River at Piketon, and the current drought signal for Pike County was not severe in the reviewed screen. The site's industrial history may provide corridors, access, and institutional knowledge unavailable on ordinary rural land.

Contradicting evidence. DOE identifies multiple groundwater contamination areas or plumes at the Portsmouth site, and cleanup strategy materials extend major demolition and waste-placement activities into the early 2030s. EPA identifies the facility as the U.S. DOE Portsmouth Gaseous Diffusion Plant, EPA ID OH7890008983. FEMA flood-hazard screening found 100-year Special Flood Hazard Area overlap in the vicinity. No executed water-source agreement, cooling design, withdrawal pathway, NPDES / thermal-discharge permit, wastewater treatment plan, or DOE construction/remediation interface agreement was identified.

Water scale is not incidental. A 10 GW data-center campus using hybrid evaporative cooling could require tens of millions of gallons per day depending on WUE. A 9.2 GW gas fleet using wet cooling could add tens of millions more. Dry or hybrid cooling could reduce that burden, but no selected design is public.

Assessment. The site is plausible for phased industrial reuse. It is not publicly proven for the announced full scale. Water, wastewater, floodplain, and remediation-interface risks are schedule- and trust-controlling.

Confidence: Meaningful but qualified
Score: 3.0 / 10

Claim 8 — Workforce

Falsifiable proposition: The region can supply an initial 4,000 construction workers, a potential peak of up to 35,000 construction workers, and up to 2,500 operating staff.

Supporting evidence. A project of this scale could draw workers regionally or nationally, especially with federal sponsorship, union participation, training commitments, and temporary workforce infrastructure. The economic-development narrative is strong enough to attract institutional support if commitments become concrete.

Contradicting evidence. Pike County is small. The public record cites a rural Appalachian setting, and census-derived context shows that a 35,000-worker peak would exceed the local labor-market scale by a wide margin. No labor-sourcing plan, housing strategy, transport plan, training pipeline, workforce agreement, medical and safety plan, or operating-staff recruitment plan was identified.

Assessment. Workforce is not impossible; it is unproven. The peak workforce claim is best understood as a regional mobilization program requiring its own infrastructure, not a local hiring assumption.

Confidence: Preliminary
Score: 2.5 / 10

Cross-cutting risk factors

1. The project stacks megaproject risks instead of sequencing them

PORTS is not only a data-center project. It is simultaneously a gas-generation project, a transmission project, a potential pipeline project, a water / wastewater project, a federal land-reuse project, and a nuclear-site remediation-interface project. The schedule risk comes from interfaces: a delay in any one of PJM, OPSB, DOE, Ohio EPA, ODNR, turbine procurement, gas transportation, or water-source design can block the others.

2. Power scale overwhelms ordinary data-center heuristics

A 9.2 GW gas plant is not a campus utility package. It is comparable to a large regional power buildout. Reference-class review of large-load projects shows the same pattern: delivery confidence rises only when sponsors can show long-lead equipment control, utility studies,

cost-allocation mechanisms, and construction readiness. In the Stargate Abilene 765 kV record, vendors described 765 kV as buildable when OEM slots, transformer logistics, workforce, and utility planning are visible. PORTS has the ambition, but not yet the equivalent proof.

3. The 2028 / 2029 mismatch is a hard schedule warning

If AEP-linked power flow is expected in 2029, then the 2028 first-phase claim requires either earlier grid service, temporary bridge power, behind-the-meter generation, a smaller energized load, or a looser definition of "online." None of those alternatives is documented as the delivery basis.

4. Water and cooling choices determine environmental feasibility

The difference between dry, hybrid, wet, and liquid-cooling designs could move water demand by tens of millions of gallons per day. Without a cooling basis, the project cannot credibly claim water feasibility, wastewater feasibility, thermal-discharge feasibility, or public-health reassurance.

5. Cost protection is politically inseparable from feasibility

If PORTS can prove beneficiary-pays treatment, local benefits, and stranded-cost protection, community resistance may remain manageable. If consumers believe the project shifts risk to bills, the ratepayer issue can become a statewide political constraint, as seen in Northern Virginia and other data-center markets where power demand, transmission lines, and customer-cost allocation became public-policy flashpoints.

6. The former nuclear-site history cuts both ways

The PORTS site gives the project an unusually strong redevelopment story: productive reuse of federal land in a community that wants investment. It also creates a high-trust burden. DOE cleanup, groundwater plumes, demolition, radiological history, and waste-disposal interfaces cannot be treated as background facts; they are part of the delivery path.

Reference-class comparison

The most relevant precedents do not say that PORTS is impossible. They say that public claims of this scale should not be scored as deliverable until they move from announcement to process to proof.

Meta Richland Parish large-load precedent. In the Meta Richland Parish record, Entergy Louisiana described more than 2 GW of new baseload generation plus significant transmission upgrades to serve a single large customer. That project is materially smaller than the 9.2 GW PORTS gas claim, yet it still required utility regulatory process, generation resources,

transmission planning, and cost consideration. The comparison is directionally unfavorable to PORTS: the Ohio announcement is larger, more complex, and less proven in the public record.

Stargate Abilene 765 kV precedent. The Stargate Abilene 765 kV record shows that extra-high-voltage transmission can be framed as technically buildable when manufacturers, utilities, and construction firms show specific readiness: OEM slots, transformer logistics, U.S.-based construction capacity, and long-lead planning. That precedent supports Piketon's potential because 765 kV equipment is not exotic in principle. It does not lift PORTS' score because project-specific evidence has not reached that level.

Northern Virginia data-center precedent. Northern Virginia's data-center experience shows that large-load growth can generate tax benefits and economic momentum, but also creates political pressure around transmission corridors, grid reliability, generation adequacy, and consumer cost allocation. PORTS has more land and a stronger redevelopment narrative than a suburban data-center cluster; it also has a far larger single-site power claim and a former nuclear-site trust burden.

Power-sector boom-and-bust analogy. The late-1990s / early-2000s gas buildout offers a cautionary pattern: capacity announcements can look rational during demand booms and then become financially fragile if fuel prices, demand, financing, or regulation move before assets are locked. PORTS' AI-demand premise may prove durable, but public feasibility scoring cannot credit multi-decade AI growth as proof of 2028 deliverability.

Overall feasibility score

The deterministic score is the capped mean required by the Feasibility Index methodology.

- Claim scores: 3.5, 2.0, 3.0, 4.0, 3.0, 3.5, 3.0, 2.5
- Unweighted claim mean: **3.1**
- Controlling claim: **firm power deliverability plus project-specific cost allocation**
- Controlling claim score: **3.0**
- Cap: 3.0 + 1.5 = **4.5**
- Published overall: min(3.1, 4.5) = **3.1 / 10**

The cap does not bind because the claim mean is already below the controlling-risk cap. That is itself revealing: PORTS is not being held down by one narrow gap. The weakness is distributed across power, schedule, gas, water, permitting, cost, workforce, and political durability.

Key data gaps and re-review triggers

The score should be re-reviewed if any of the following becomes public:

1. **Power and turbines:** executed gas-turbine, EPC, and long-term service agreements with delivery dates, price terms, and liquidated-damages protection.
2. **Gas:** firm supply and transportation agreements, pipeline sponsor, route, compressor plan, FERC or Ohio filing, and capacity sized to the 9.2 GW claim.
3. **PJM / AEP:** project-specific PJM studies, interconnection or load-service commitments, network-upgrade assignment, and AEP energization schedule.
4. **OPSB:** verified docket filings, route selection, public-comment record, staff report, certificate approval, conditions, appeals, and construction milestones for the transmission line.
5. **Ratepayer protection:** PORTS-specific tariff, special contract, PUCO order, cost-allocation mechanism, collateral, parent guarantee, exit fee, minimum-take obligation, or stranded-cost protection.
6. **DOE / NEPA:** executed land-use agreement, construction/remediation interface plan, NEPA pathway determination, and cultural / ecological consultation record.
7. **Air and water permits:** Ohio EPA air applications or permits for the gas plant and backup generation; NPDES, thermal-discharge, stormwater, wastewater, and ODNR water-withdrawal filings.
8. **Water supply:** water-source agreement, drought-year yield analysis, cooling design, reclaimed-water strategy, and blowdown / brine management plan.
9. **Site and logistics:** parcel boundary, buildable-acreage map, grading plan, heavy-haul route, bridge checks, rail / siding status, fiber diversity commitments, and laydown plan.
10. **Workforce:** labor agreement, training plan, workforce housing, transport, medical / safety, security, and operating-staff recruitment program.
11. **Community compact:** local benefit agreement, tax-sharing plan, public-health briefing, corridor landowner outreach, and durable commitments that survive federal political turnover.
12. **Financing and offtake:** project-finance commitment, customer/offtake contracts, revenue model, U.S.–Japan financing draw mechanics, and profit-split terms.

Recommendation

PORTS should be scored as a **weak but not impossible** project. The public record supports a serious development effort at Piketon; it does not support the announced 9.2 GW / 10 GW buildout as deliverable on the stated schedule.

The practical posture is a gated first phase:

- prove an 800 MW power path before crediting the 10 GW campus;
- align the 2028 data-center claim with actual AEP/PJM energization evidence;
- publish a cooling and water balance before claiming environmental feasibility;
- isolate consumer cost exposure through a project-specific order or contract;
- sequence DOE remediation, NEPA, Ohio EPA, ODNR, OPSB, PJM, and local approvals in one public critical path;
- treat the January 2029 federal transition as a real durability deadline, not a political footnote.

Score should remain 3.1 until the following named evidence is public: executed turbine/EPC agreements, firm gas transportation and pipeline filings, PJM/AEP interconnection and network-upgrade commitments, OPSB-approved transmission route and schedule, PORTS-specific ratepayer-protection order or contract, first-phase water and cooling permits, and DOE construction/remediation interface approval.