

October 13, 2022

VIA E-MAIL

Mr. Scott Ramsey
Industrial Section Chief
Alabama Department of Environmental Management
Water Division
P.O. Box 301463
Montgomery, AL 36130-1463

Re: **Annual Progress Report for Units 4 and 5 of the James M. Barry Electric Generating Plant (NPDES Permit No. AL0002879)**

Dear Mr. Ramsey:

In accordance with 40 C.F.R. § 423.19(f), this constitutes the “Annual Progress Report” of Alabama Power Company (“Alabama Power”) regarding the interim milestones listed in Alabama Power’s Notice of Planned Participation (“NOPP”) for Units 4 and 5 of the James M. Barry Electric Generating Plant (“Plant Barry”), as submitted to the Alabama Department of Environmental Management on October 13, 2021.

Alabama Power’s NOPP for Plant Barry Units 4 and 5 indicated an intent to comply with EPA’s 2020 *Steam Electric Reconsideration Rule*¹ (“2020 ELG Rule”) by complying with the Rule’s provisions relating to “unit[s] that will achieve permanent cessation of coal combustion by December 31, 2028.”² The 2020 ELG Rule requires any facility that submits a NOPP for the permanent cessation category to submit an Annual Progress Report on the interim milestones provided in the NOPP.³ The “Annual Progress Report shall detail the completion of any interim milestones listed in the [NOPP] since the previous progress report, provide a narrative

¹ EPA, *Steam Electric Reconsideration Rule*, 85 Fed. Reg. 64,650 (Oct. 13, 2020) (codified at 40 C.F.R. Part 423).

² 40 C.F.R. § 423.19(f)(1).

³ *Id.* § 423.19(f)(3).

discussion of any completed, missed, or delayed milestones, and provide updated milestones.”⁴

The following discussion serves as Alabama Power’s Annual Progress Report on the interim milestones for Plant Barry Units 4 and 5.

Interim Milestones

Alabama Power’s Plant Barry NOPP listed the following interim milestones for Unit 4 and Unit 5.

3rd/4th Quarter 2022: Submit the latest (2022) Integrated Resource Plan information to the Alabama Public Service Commission, typically as part of a triennial submission

December 31, 2028: Permanent cessation of coal combustion

Alabama Power submitted its 2022 Integrated Resource Plan (“IRP”) summary report to the Alabama Public Service Commission on September 22, 2022.⁵ The report identifies the transition of Barry Unit 4 to operate solely on natural gas by December 31, 2028. The report also identifies the planned retirement of Barry Unit 5 by December 31, 2028.⁶

If you have any questions regarding this Annual Progress Report, please feel free to contact me.

Sincerely,



Mike Godfrey
Environmental Affairs General Manager

⁴ *Id.* § 423.19(f)(4).

⁵ APC’s 2022 IRP summary report is available here: <https://www.alabamapower.com/content/dam/alabama-power/pdfs-docs/company/compliance---regulation/IRP.pdf>. APC’s latest filing pursuant to the Securities Exchange Act of 1934 was also referenced in the October 13, 2021 Plant Barry NOPP and is available here: <https://d18rn0p25nwr6d.cloudfront.net/CIK-0000092122/50f6cd27-714e-488e-8e0d-cb05252e273a.pdf> (see II-42 to -43).

⁶ The summary report explains that Alabama Power has assumed, for purposes of the IRP, a retirement date of January 1, 2024 for Barry Unit 5, but such assumption is subject to change based on prevailing operating conditions.