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October 10, 2025

VIA E-MAIL

Mr. Scott Jackson
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. Jackson:

In accordance with 40 C.F.R. § 423.19(g) (2024), this letter constitutes the "Annual Progress Report" of Alabama Power Company ("Alabama Power" or the "Company") for the James M. Barry Electric Generating Plant ("Plant Barry").

On October 13, 2021, Alabama Power submitted a Notice of Planned Participation ("NOPP") to the Alabama Department of Environmental Management for Plant Barry Units 4 and 5 that indicated an intent to comply with EPA's 2020 ELG Rule¹ by complying with the Rule's provisions relating to "unit[s] that will achieve permanent cessation of coal combustion by December 31, 2028."² Any facility that submits a NOPP for the permanent cessation category is required 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 discussion of any completed, missed, or delayed milestones, and provide updated

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(g) (2024).

³ *Id.* § 423.19(g)(3).

milestones.”⁴ EPA’s 2024 ELG Rule⁵ added a new provision that requires a participant also to include one of the following in Annual Progress Reports:

- A copy of the official suspension filing (or equivalent filing) made to the facility’s reliability authority detailing the conversion to a fuel source other than coal;
- A copy of the official retirement filing (or equivalent filing) made to the facility’s reliability authority which must include a waiver of recission rights; or
- An initial certification, or recertification for subsequent annual progress reports, containing a statement that the facility will make one of the above-referenced filings.⁶

The remaining portions of this Annual Progress Report address 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 (“IRP”) information to the Alabama Public Service Commission (“APSC”), typically as part of a triennial submission

December 31, 2028: Permanent cessation of coal combustion

In previous Annual Progress Reports, Alabama Power has explained that: (1) the first interim milestone was timely completed; and (2) the conversion of Barry Unit 4 to operate solely on natural gas is complete. Accordingly, the permanent cessation of coal combustion milestone for Unit 4 has been satisfied.

Alabama Power’s 2025 IRP Summary Report, which was recently submitted to the APSC, continues to identify the permanent cessation of coal combustion at Barry Unit 5 by no later than December 31, 2028. The need to operate Barry Unit 5 on natural gas beyond that date remains under consideration, however, in light of the potential for increased and

⁴ *Id.* § 423.19(g)(4).

⁵ EPA, Supplemental Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category, 89 Fed. Reg. 40,198 (May 9, 2024) (codified at 40 C.F.R. Part 423).

⁶ See 40 C.F.R. § 423.19(g)(4)(i)-(iii) (2024).

unanticipated demand for power. As no final decision has been made in that regard, Alabama Power does not have any updated Unit 5 milestones to share at this time.

Reliability Filing Requirement

Alabama Power does not have a reliability authority for which the referenced filings are required. Alabama Power has reported its plans for permanent cessation of coal combustion by December 31, 2028, at these Barry units in the above-referenced 2025 IRP Summary Report and in its most recent Environmental Compliance Plan, which was filed with the APSC on December 10, 2024, in Docket Nos. 18117 and 18416.

* * * * *

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Godfrey", written in a cursive style.

Mike Godfrey
Environmental Affairs General Manager