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October 12, 2026

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 Ernest C. Gaston Electric Generating Plant
Unit 5 Combustion Residual Leachate (NPDES Permit No. AL0003140)**

Dear Mr. Jackson:

In accordance with 40 C.F.R. § 423.19(h), this letter constitutes the “Annual Progress Report” of Alabama Power Company (“Alabama Power” or the “Company”) for combustion residual leachate (“CRL”) discharges for Unit 5 at the Ernest C. Gaston Electric Generating Plant (“Plant Gaston”). On December 30, 2025, Alabama Power submitted a Notice of Planned Participation (“NOPP”) to the Alabama Department of Environmental Management for Plant Gaston Unit 5 CRL discharges that indicated an intent to comply with EPA’s 2024 ELG Rule¹ by complying with the Rule’s provisions relating to “unit[s] that will achieve permanent cessation of coal combustion by December 31, 2034” (“PCCC by 2035”).²

¹ 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).

² 40 C.F.R. § 423.19(h). On October 13, 2021, Alabama Power submitted a NOPP in accordance with EPA’s 2020 ELG Rule (EPA, *Steam Electric Reconsideration Rule*, 85 Fed. Reg. 64,650 (Oct. 13, 2020)) selecting the permanent cessation of coal combustion by December 31, 2028 (“PCCC by 2029”) compliance subcategory for Plant Gaston Units 1-5. Alabama Power subsequently filed a “transfer NOPP” for Units 1-4 on September 17, 2025, transitioning those units from the PCCC by 2029 subcategory to the “generally applicable” compliance pathway. Units 1-4 are therefore not included in this Annual Progress Report. Alabama Power’s December 30, 2025 PCCC by 2035 NOPP for Unit 5 CRL discharges was submitted out of an abundance of caution due to a perceived ambiguity or gap in the relevant regulations. Alabama Power still plans to permanently cease Unit 5 coal combustion by December 31, 2028.

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, provide updated milestones,” and include one of the following:

- 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.⁴

As noted earlier, Plant Gaston Units 1-4 have been transferred to the “generally applicable” compliance pathway. For this reason, the remaining portions of this Annual Progress Report only address the interim milestones for Plant Gaston Unit 5.

Gaston Unit 5

Alabama Power’s Plant Gaston PCCC by 2035 NOPP listed the following interim milestone for Unit 5.

December 31, 2028: Permanent cessation of coal combustion

Work has commenced and remains ongoing to transition Gaston Unit 5 to operate solely on natural gas by December 31, 2028.

Reliability Filing Requirement

Alabama Power does not have a reliability authority for which the referenced filings are required. That said, and as previously disclosed in comparable progress reports to your office respecting Gaston Unit 5 (and other Alabama Power generating facilities), the Company routinely updates the Alabama Public Service Commission (“APSC”) on the status of its units. Updates concerning Gaston Unit 5 were recently provided as part of the 2025 IRP Summary Report, which was submitted to the APSC, and in the 2026 Environmental Compliance Plan, which was filed with the APSC on December 9, 2025, in Docket Nos. 18117 and 18416.

³ 40 C.F.R. § 423.19(h)(3).

⁴ See *id.* § 423.19(h)(4).

* * * * *

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

Sincerely,

A handwritten signature in cursive script that reads "Mike Godfrey". The signature is written in dark ink and is positioned below the word "Sincerely,".

Mike Godfrey
Environmental Affairs General Manager