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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 1-5 of the Ernest C. Gaston Electric
Generating Plant (NPDES Permit No. AL0003140)**

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 Ernest C. Gaston Electric Generating Plant (“Plant Gaston”).

On October 13, 2021, Alabama Power submitted a Notice of Planned Participation (“NOPP”) to the Alabama Department of Environmental Management for Units 1-5 of Plant Gaston¹ that indicated an intent to comply with EPA’s 2020 ELG Rule² by complying with the Rule’s provisions relating to “unit[s] that will achieve permanent cessation of coal combustion by December 31, 2028.”³ 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.⁴ 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 As stated in the October 13, 2021 NOPP, Plant Gaston Units 1-4 are owned by Southern Electric Generating Company (“SEGCO”), which itself is owned equally by Alabama Power and its affiliate Georgia Power Company. Alabama Power owns Plant Gaston Unit 5. Alabama Power is the designated operator for all five units and serves as agent for SEGCO. Alabama Power submits this Annual Progress Report (and all such reports) pertaining to Units 1-4 with explicit permission from and as agent for SEGCO.

² EPA, *Steam Electric Reconsideration Rule*, 85 Fed. Reg. 64,650 (Oct. 13, 2020) (codified at 40 C.F.R. Part 423).

³ 40 C.F.R. § 423.19(g) (2024).

⁴ *Id.* § 423.19(g)(3).

discussion of any completed, missed, or delayed milestones, and provide updated milestones.”⁵ EPA’s 2024 ELG Rule⁶ 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 rescission 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.⁷

The remaining portions of this Annual Progress Report address the interim milestones for Plant Gaston.

Gaston Units 1-4

On September 17, 2025, Alabama Power submitted an “Automatic Transfer NOPP” in accordance with 40 C.F.R. § 423.19(l), 40 C.F.R. § 423.13(o)(1)(ii)(B), and Part I.E.2.d) of Plant Gaston NPDES Permit No. AL0003140, triggering Alabama Power’s automatic transfer from the 2028 permanent cessation of coal combustion compliance option to the “generally applicable” compliance option for bottom ash transport water. Accordingly, Alabama Power is no longer working to achieve any interim and/or final milestones for Units 1-4 set out in the October 13, 2021 NOPP or any previous Annual Progress Reports.

Gaston Unit 5

Alabama Power’s Plant Gaston NOPP listed the following interim milestones for Unit 5.

3 rd /4 th Quarter 2022:	Submit the latest (2022) IRP information to the Alabama Public Service Commission (“APSC”), typically as part of a triennial submission
December 31, 2028:	Permanent cessation of coal combustion

⁵ *Id.* § 423.19(g)(4).

⁶ 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).

⁷ See 40 C.F.R. § 423.19(g)(4)(i)-(iii) (2024).

Alabama Power's previous Annual Progress Reports explained that the first interim milestone has already been timely completed.

As reflected in Alabama Power's 2025 IRP Summary Report, which was recently submitted to the APSC, the Company continues to plan to transition Gaston Unit 5 to operate solely on natural gas by December 31, 2028. In connection with this transition to natural gas, Transcontinental Gas Pipe Line Company, LLC ("Transco") filed on August 22, 2022, for a certificate of public convenience and necessity with the Federal Energy Regulatory Commission ("FERC") authorizing Transco to construct and operate its Southeast Energy Connector Project.⁸ FERC issued the certificate for the project on November 16, 2023. Construction of the Transco project is complete.

Reliability Filing Requirement

Alabama Power does not have a reliability authority for which the referenced filings are required. As noted above, the Company has reported its plans for Plant Gaston in its 2025 IRP Summary Report, as well as in connection with proceedings before the APSC in Docket No. 33513.

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

Sincerely,



Mike Godfrey
Environmental Affairs General Manager

⁸ See *In re Transcontinental Gas Pipe Line Company, LLC*, FERC Docket No. CP22-501-000.