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October 13, 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 the William Crawford Gorgas Facility (NPDES Permit No. AL0002909)**

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 the William Crawford Gorgas facility ("Plant Gorgas"). All electric generating units at Plant Gorgas have been retired and demolished. However, solid waste landfill cells containing coal combustion residuals ("CCR") (or capable of containing CCR) exist at the facility, continue to accept CCR from other Alabama Power facilities, and periodically generate combustion residual leachate ("CRL").

On December 30, 2025, Alabama Power submitted a Notice of Planned Participation ("NOPP") to the Alabama Department of Environmental Management for Plant Gorgas Units 8-10 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."² Alabama Power submitted this NOPP out of an abundance of caution due to a perceived ambiguity or gap in the relevant regulations, which is more fully explained in the Plant Gorgas NOPP. This Annual Progress Report is submitted due to this same regulatory uncertainty.

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).

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 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.⁴

Interim Milestones

The retirement of all Gorgas units is complete, and coal combustion has permanently ceased. Accordingly, Alabama Power's Plant Gorgas NOPP did not contain interim milestones.

Reliability Filing Requirement

Alabama Power does not have a reliability authority for which the referenced filings are required. As previously noted in comparable progress reports to your office respecting other Alabama Power generating facilities, the Alabama Public Service Commission was periodically updated regarding the status of this now-retired facility.

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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

³ *Id.* § 423.19(h)(3).

⁴ *See id.* § 423.19(h)(4).