



600 North 18th Street  
Post Office Box 2641  
Birmingham, Alabama 35291

October 11, 2023

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*<sup>1</sup> (“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.”<sup>2</sup> 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.<sup>3</sup> The “Annual Progress Report shall detail the completion of any interim milestones listed in the [NOPP] since the previous progress report, provide a narrative

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

<sup>2</sup> 40 C.F.R. § 423.19(f)(1).

<sup>3</sup> *Id.* § 423.19(f)(3).

discussion of any completed, missed, or delayed milestones, and provide updated milestones.”<sup>4</sup>

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.

3<sup>rd</sup>/4<sup>th</sup> 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

As stated in Alabama Power’s October 13, 2022 Annual Progress Report, the company submitted its 2022 Integrated Resource Plan (“IRP”) summary report to the Alabama Public Service Commission on September 22, 2022.<sup>5</sup> The report identified the transition of Barry Unit 4 to operate solely on natural gas by no later than December 31, 2028. The report also identified the planned retirement of Barry Unit 5 by no later than December 31, 2028.<sup>6</sup> The summary report states that, for purposes of that IRP, Alabama Power assumed a retirement date of January 1, 2024, for Barry Unit 5, but that such assumption is subject to change based on prevailing operating conditions. The Company continues to evaluate whether continued operation of Unit 5 beyond January 2024 (but not beyond December 31, 2028) is in the best interest of customers.

The conversion of Barry Unit 4 to operate solely on natural gas is complete. Alabama Power does not have any updated milestones to share at this time.

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

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<sup>4</sup> *Id.* § 423.19(f)(4).

<sup>5</sup> APC’s 2022 IRP summary report is available here:  
<https://www.alabamapower.com/content/dam/alabama-power/pdfs-docs/company/compliance---regulation/IRP.pdf>.

<sup>6</sup> *See, e.g., id.* at 11.

Scott Ramsey  
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Sincerely,

A handwritten signature in cursive script that reads "Mike Godfrey".

Mike Godfrey, General Manager  
Environmental Compliance