



NRG Energy, Inc.
910 Louisiana St.
Houston, TX 77002

BY EMAIL AND CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

December 13, 2022

Mr. Matthew Udenenwu
Manager, Water Permitting Section
Texas Commission on Environmental Quality, MC 148
P.O. Box 13087
Austin, TX 78711-3087

**Subject: Limestone Electric Generating Station
USEPA's Final Steam Electric Reconsideration Rule
Planned Participation Progress Report
TPDES Permit No. WQ0002430000
TCEQ Customer Reference No. CN603207218
TCEQ Regulated Entity No. RN100542927**

Dear Mr. Udenenwu:

NRG Texas Power LLC ("NRG Texas") plans to comply with the discharge of bottom ash transport water to surface waters of the state in accordance with USEPA's Final Steam Electric Reconsideration Rule (ELG Rule), effective December 14, 2020, at the Limestone Electric Generating Station (Limestone) located in Limestone County, Texas.¹ The ELG rule provides multiple compliance pathways listed in 40 CFR 423.13, including an ELG-compliant bottom ash system with up to 10% purge (§423.13(k)(2)(i)), permanent cessation of coal burning activities due to retirement or repowering (§423.13(k)(2)(ii)), or low utilization electric generating units (§423.13(k)(2)(iii)).

NRG Texas is working diligently on an ELG Rule compliance path for Limestone. NRG Texas will continue to provide annual updates on its compliance path, and if that path changes to cessation of coal combustion, will include updates on the related schedule and milestones in its annual update. In addition, NRG Texas would file for any necessary changes to its permit to reflect this compliance path.

If you have any questions, do not hesitate to contact me at (713) 537-2776 or by email at craig.eckberg@nrg.com.

Sincerely,

Craig Eckberg
Sr. Director, Environmental Services
NRG Energy, Inc.

¹ Limestone does not discharge FGD wastewater.