



Midwest Generation, LLC
Powerton Generating Station
13082 E. Manito Road
Pekin, Illinois 60087

November 6, 2025

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attention: Compliance Assurance Section, Mail Code #19
2520 W Iles Ave
Springfield, Illinois 62704
Attn: Darin LeCrone

Subject: Revised Effluent Limitation Guidelines Notice of Planned Participation
Annual Progress Report
Midwest Generation, LLC - Powerton Generating Station
Account No. W1798010008
NPDES Permit No. IL0002232

Dear Mr. LeCrone:

Midwest Generation, LLC (MWG) recently observed that an incorrect citation was used in the most recent Annual Progress Report, dated October 8, 2025, for the Notice of Planned Participation (NOPP) for permanent cessation of coal combustion for the Powerton Generating Station's generating units submitted on October 13, 2021. The report cited 40 CFR 423.19(f)(3), which is an annual certification statement for the low utilization electric generating unit subcategory. The report should have cited 40 CFR 423.19(g)(3), which is an annual progress report for the Notice of Planned Participation (NOPP) for the permanent cessation of coal combustion by December 31, 2028 subcategory. This incorrect citation was also used in the 2022-2024 Annual Progress reports. Please see below for a revised 2025 Annual Progress Report using the correct citation.

In accordance with 40 CFR 423.19(g)(3), Midwest Generation, LLC (MWG) is hereby providing an annual progress report for the Notice of Planned Participation (NOPP) for permanent cessation of coal combustion for the Powerton Generating Station's generating units submitted on October 13, 2021.

Interim Milestones Narrative

A detailed timeline to achieve permanent cessation of coal combustion is not yet available as deactivation notices have not been submitted to PJM. Permanent cessation of coal combustion is currently estimated to be achieved no later than December 31, 2028; however, a retirement deactivation notice has not yet been submitted to PJM. While this annual progress report presents the best information available, the following factors could result in changes to MWG's ELG compliance strategy:

- Regulatory Changes – On October 2, 2025, EPA published the Proposed Steam Electric ELG Deadline Extension Rule (90 Fed. Reg. 47,693). EPA's proposed rulemaking or other potential

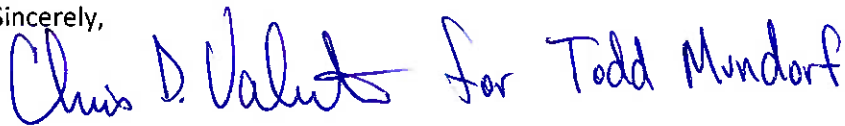
future regulatory changes (including future regulatory changes that result from litigation) could impact MWG's ELG compliance strategy.

- Litigation – Following EPA's issuance of the 2024 Rule, various petitioners representing states, electric utilities, and environmental groups challenged the 2024 Rule in the Eighth Circuit. Although the case is currently held in abeyance, if the Eighth Circuit reaches a decision on the merits of the case, it could impact MWG's ELG compliance strategy.

The factors detailed above could result in changes to MWG's ELG compliance strategy and may result in modification of the October 13, 2021 NOPP. MWG will submit appropriate documentation, pursuant to 40 CFR 423, if changes to the NOPP are needed.

Please contact Ms. Jill Buckley at Jill.Buckley@nrg.com if you have any questions or need any additional information regarding this submittal.

Sincerely,

A handwritten signature in blue ink that reads "Chris D. Valenti for Todd Mundorf". The signature is written in a cursive style.

Todd Mundorf
Plant Manager
Powerton Generating Station

cc: Mark Liska, Illinois EPA