



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

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

December ²¹7, 2023

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

Subject: W. A. Parish Electric Generating Station
USEPA's Final Steam Electric Reconsideration Rule
Planned Participation Progress Report
TPDES Permit No. WQ0001038000

Dear Mr. Udenenwu:

NRG Texas Power LLC ("NRG Texas") plans to comply with the discharge of bottom ash transport and Flue Gas Desulfurization (FGD) 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 W.A. Parish Electric Generating Station (Parish) located in Fort Bend County, Texas. 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)) and FGD water effluent limits (§423.13(g)(1)), permanent cessation of coal burning activities due to retirement or repowering (§423.13(k)(2)(ii), (g)(2)(i)), or low utilization electric generating units (§423.13(k)(2)(iii), (g)(2)(iii)).

NRG Texas is working diligently on an ELG Rule compliance path for Parish. As such, NRG Texas has yet to establish milestones concerning cessation of coal combustion. Please refer to the attachment for updates related to milestones as identified in the original Notice of Planned Participation. NRG Texas will continue to provide annual updates on its compliance path. If conditions change prior to the compliance date and cessation of coal combustion is warranted, NRG Texas 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,

A handwritten signature in blue ink, appearing to read "C.R. Eckberg", is written over a horizontal line.

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

W.A. Parish Electric Generating Station

In accordance with 40 CFR 423.19(f)(1) and TPDES Permit No. WQ0001038000, NRG Texas Power LLC (NRG Texas) is providing requested information to clarify interim milestones and projected dates of completion for the installation of an ELG-compliant bottom ash system or, in the alternative, if prompted by new circumstances, cessation of coal combustion.

1. Electric Generating Units intending to achieve permanent cessation of coal combustion:
No Change as of December 2023
Unit 5 – Not anticipated to cease burning coal at this time
Unit 6 – Not anticipated to cease burning coal at this time
Unit 7 – Not anticipated to cease burning coal at this time
Unit 8 – Not anticipated to cease burning coal at this time
2. Expected date that each electric generating unit is projected to achieve permanent cessation of coal combustion:
No Change as of December 2023
Unit 5 – Not anticipated to cease burning coal at this time
Unit 6 – Not anticipated to cease burning coal at this time
Unit 7 – Not anticipated to cease burning coal at this time
Unit 8 – Not anticipated to cease burning coal at this time
3. Whether each date represents a retirement or a fuel conversion:
No Change as of December 2023
Unit 5 – Not anticipated to retire or cease burning coal
Unit 6 – Not anticipated to retire or cease burning coal
Unit 7 – Not anticipated to retire or cease burning coal
Unit 8 – Not anticipated to retire or cease burning coal
4. Whether each retirement or fuel conversion has been approved by a regulatory body:
No Change as of December 2023
NRG Texas does not currently intend to cease burning coal, approval for retirement or fuel conversation has not been sought for Unit 5, Unit 6, Unit 7 or Unit 8.
5. What the regulatory body is: No Change as of December 2023
Electric Reliability Council of Texas (ERCOT), Public Utility Commission of Texas (PUCT)

NRG Texas has not notified either the Electric Reliability Council of Texas or the Public Utility Commission of Texas that it intends to cease coal combustion at Parish's generating units, but by this submission to TCEQ has laid out that path and related timing and documented that it would coordinate appropriately with ERCOT and the PUCT, as warranted.
6. The NOPP shall also include, for each such generating unit, a timeline to achieve the permanent cessation of coal combustion. Each timeline shall include interim milestones and the projected

dates of completion. Note the timeline below also includes interim milestones and projected dates of completion for the installation of an ELG-compliant bottom ash system.

Action	Estimated Timeline	Interim Milestones
<p>Further advance from preliminary engineering to the full engineering and design process for the implementation of the ELG-compliant technology</p>	<p>On or before January 31, 2022</p>	<p>For bottom ash systems:</p> <p>Units 5 & 6 Working with outside consultants on scope to refurbish the existing bottom ash/dewatering system. Scope development completed by end of 2023</p> <p>Units 7 & 8, working with outside consultant to install a new dry drag chain system or refurbish the existing bottom ash/dewatering system. Scope development completed by end of 2023</p> <p>For the FGD system, Physical/Chemical/Biological treatment has been selected Development of Function Specification to go out for EPC bid in progress with outside consultants being selected by the end of 1st quarter 2023.</p> <p>Funding is currently being secured.</p>
<p>Submit an annual progress report required by 40 CFR 423.19(f)(3) and/or a status report on the engineering and design process for the implementation of the ELG-compliant technology</p>	<p>Beginning December 31, 2022</p>	<p>For both bottom ash formal engineering and design has not been completed to date. Anticipated completion by end of 2023.</p> <p>For FGD systems, formal engineering and design has not been completed to date. Anticipated completion by end of 2nd quarter 2023.</p>
<p>Submit an annual progress report required by 40 CFR 423.19(f)(3) and/or a status report on the engineering and design process for the implementation of the ELG-compliant technology</p>	<p>Beginning December 31, 2023</p>	<p>Engineering is in the process of identifying flow meters and installation locations to support monitoring for the 10%, 30-day rolling average for BA purge allowance. Station is has begun system/equipment upgrades for Units 5 & 6 BA system to ensure compliance. Units</p>

		<p>5&6 work anticipated to be complete by mid-2024. Facility will begin system/equipment upgrades for Units 7&8 BA system in early 2024.</p> <p>For the FGD system, engineering is evaluating various treatments to ensure compliance. On-site pilot studies are currently being conducted at the facility. It is anticipated that final design review/selection will be completed in early 2024 with installation beginning in mid-2024 to ensure implementation of the treatment system by December 2025-compliance date.</p>
Submit an annual progress report required by 40 CFR 423.19(f)(3) OR documentation informing the Agency of the status to complete and operate the ELG-compliant technology	Beginning December 31, 2024	Anticipate to have completed by the listed date.
Submit an annual progress report required by 40 CFR 423.19(f)(3) OR comply with the ELG requirements with the ELG-compliant technology	Beginning December 31, 2025	Anticipate to have completed by the listed date.
Submit an annual progress report required by 40 CFR 423.19(f)(3), if applicable	December 31, 2026	To be determined
Submit an annual progress report required by 40 CFR 423.19(f)(3), if applicable, including a copy of any notice submitted to ERCOT or the PUCT, as relevant	December 31, 2027	To be determined
Cease coal-fired operations of Units 5, 6, 7 and 8, if applicable	No later than December 31, 2028	To be determined