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July 2, 2026

Submitted via Email

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Indiana Department of Environmental Management
Office of Water Quality, Industrial Permits Section

RE: Notice of Planned Participation 40 CFR 423.19 (f)(1) – Annual Progress Report
F.B. Culley Generating Station, NPDES Permit No IN0002259

Southern Indiana Gas and Electric Company (SIGECO), doing business as CenterPoint Energy Indiana South (CEIS) submitted a Notice of Planned Participation under 40 CFR 423.19 (f)(1) on June 27, 2023 and is providing in this annual progress report submittal the information required under 40 CFR 423.19 (f)(4).

F.B. Culley Unit 2 was planned for retirement no later than December 31, 2025. However, the U.S. Department of Energy issued a 202(c) order on December 23, 2025, requiring that Unit 2 remain available through March 23, 2026. On March 23, 2026, the order was extended for another 90 days, then extended again on June 19, 2026 for another 90 days. It is expected that the order will continue to be extended through the current Trump Administration. Consequently, SIGECO has been in communication with your office for a NPDES permit modification to reflect that Unit 2 will retire upon expiration of the current U.S. Department of Energy 202(c) order, or any extension thereto, but no later than December 31, 2028.

The planned fuel conversion of Unit 3 to natural gas fired combustion no later than December 31, 2027 has been paused due to the 2025 Integrated Resource Plan (IRP) study determining that the conversion to natural gas fired is not the most economic option. The generation plan and future of Unit 3 will be studied again during the next Integrated Resource Plan study, which is due in 2028 and within the timing of the 2028 Permanent Cessation of Coal provision.

It should be noted that F.B. Culley Unit 3 does not discharge process wastewater as a result of having previously converted the ash handling to dry systems and commissioning an FGD Spray Dryer Evaporator Zero Liquid Discharge System in April 2023. The 2025 IRP report is currently under review by the IURC and a final report from the IURC has not yet been issued, and in the interest of insuring the best decision is being made for customers who incur cost associated with company expenditures, the decision was made that it would be prudent to pause the conversion work as the company re-evaluates the impact of recent regulatory changes and anticipated additional changes in the coming months.

CEIS has completed construction of simple cycle gas turbines at the A.B. Brown Generating Station and both units began commercial operation in 2025. Additionally, CEIS has brought a 191 MW solar site into commercial operation in 2025. These projects are part of the overall generation transition plan that resulted from prior IRP studies, which included the retirement of the A.B. Brown coal-fired combustion turbines in October 2023, and the planned retirement of the F.B. Culley Unit 2 coal-fired combustion turbine in December 2025. The milestones to



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achieve the permanent cessation of coal combustion in F.B. Culley Unit 3 continue to be reviewed in cooperation with generation transition planning and legal governance teams.

Please contact Angela Casbon-Scheller at Angela.Casbon-Scheller@centerpointenergy.com or 812-491-4787 for any questions or if additional information is needed.

Sincerely,

A handwritten signature in blue ink that reads "Shane Bradford".

Shane Bradford
Vice-President, Indiana Electric