



BOUNDLESS ENERGY™

VIA EMAIL: [Carol.Paden@deq.ok.gov](mailto:Carol.Paden@deq.ok.gov)

October 10, 2024

Ms. Carol Paden  
Oklahoma Department of Environmental Quality  
Industrial Wastewater Permitting  
707 North Robinson  
Oklahoma City, OK 73102

**RE: Notice of Planned Participation - Annual Progress Report (2024)  
Northeastern Power Station (Northeastern); DEQ Permit No. OK0034380  
Public Service Company of Oklahoma (PSO)  
dba American Electric Power (AEP)**

Dear Ms. Paden:

Public Service Company of Oklahoma (PSO) hereby submits this Notice of Planned Participation (NOPP) Annual Progress Report for the Northeastern Power Station as required by 40 CFR 423.19(g)(3). This report details the completion of interim milestones listed in the NOPP, provides a narrative discussion of all completed, missed, or delayed milestones, and includes updated milestones.

In 2016, American Electric Power (AEP) applied for a variance with respect to the updated Effluent Limit Guidelines for steam electric power generating units as they applied to Northeastern’s Unit 3. The submittal of the NOPP superseded this variance request and indicated that, pursuant to 40 CFR 423.19(f)(2), Northeastern Unit 3 would cease combustion of coal by December 31, 2026.

Pursuant to 40 CFR 423.19(g)(4)(iii), AEP/PSO will make the appropriate filings to the Southwest Power Pool detailing its future intentions for the facility (i.e. fuel conversion or retirement). It is expected that the filing will be submitted no later than December 31, 2026.

Interim Milestone	Completed/ Missed/ Delayed?	Narrative Discussion	Updated Milestone (if applicable)
PSO will limit Unit 3’s capacity factor to no more than 70% in 2021	In progress and on schedule	In 2021 and 2022, PSO met its obligation to limit Unit 3’s capacity	Not applicable at this time.

Interim Milestone	Completed/ Missed/ Delayed?	Narrative Discussion	Updated Milestone (if applicable)
and 2022; and will decrease the capacity factor by an additional 10% every two years thereafter until its retirement in 2026.		factor to no more than 70%. In 2023, PSO limited the capacity factor to no more than 60% and in 2024, the capacity factor was less than 60%. PSO anticipates it will be able to continue to limit the capacity factor to no more than 50% in 2025 and 2026	
Pursuant to the Regional Haze Agreements, PSO was obligated to evaluate whether generation from Unit 3 can be replaced at lower or equal total projected cost from natural gas or renewable resources. If power is available from such resources at a lower projected total cost (including consideration of PSO's need to recover its remaining investment in the units), then the operating unit will retire no later than December 31, 2025. The results of that analysis and its impact on the projected retirement date were required to be shared with ODEQ and US EPA once completed.	Completed.	In December 2021, PSO evaluated the cost of replacing generation from Unit 3 with natural gas or renewable resources and determined that it was not feasible to do so. PSO notified USEPA and Oklahoma DEQ of this by letter dated 12/20/2021.	

PSO does not waive, and expressly reserves, all rights or options available to it pursuant to 40 CFR Part 423, including 40 CFR 423.13(o)(1) (regarding transferring to another compliance option), 40 CFR 423.18 (regarding qualifying events) or any other provision of state or federal law that may apply.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief: true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Thank you for your attention to the aforementioned details. If you need additional information or have any questions regarding this request, please contact Emily Veteto at 214-777-1373 or via email at emmatlock@aep.com.

Sincerely,

A handwritten signature in blue ink that reads "Timothy W. Lohner". The signature is written in a cursive style.

Timothy Lohner, PhD  
Environmental Manager  
Water and Ecological Resource Services  
American Electric Power

C: Michael Thomas (ODEQ)  
Lee Denham (PSO)  
Sammie Miller (PSO)  
Kathy Milenkovski (AEP Legal)  
Emily Veteto (AEP Service Corp)  
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