



VIA EMAIL: Carol.Paden@deq.ok.gov

October 10, 2025

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 (202)
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 The submittal of the NOPP superseded this variance request and indicated that, pursuant to 40 CFR 423.19(f)(2), Northeastern Unit 3 would cease combustion of coal by December 31, 2026.

At the time of this submittal, AEP/PSO intends to cease coal combustion at Northeastern on December 31, 2025, but continue operating Unit 3 utilizing natural gas in 2026 and beyond, through May 31, 2041. Pursuant to 40 CFR 423.19(g)(4)(iii), AEP/PSO will make the appropriate filings to the Southwest Power Pool with details regarding this operational change.

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 and 2022; and will decrease the capacity factor by an additional 10% every two years thereafter until its retirement in 2026.	In progress and on schedule, note updated Milestone.	PSO has met all applicable capacity factor limitations to date. PSO anticipates it will be able to limit the capacity factor to no more than 50% in 2025.	PSO and the Oklahoma Department of Environmental Quality entered into a Second Amended Regional Haze Agreement (SARHA) on May 14, 2025, which removed the 2026 retirement obligation and instead, authorizes operation of Unit 3, on gas only, through May 31, 2041, subject to a capacity factor of no more than 50% in 2025 and no more than 20% in 2026 and beyond. Upon US EPA's approval of the SARHA as part of the Oklahoma State Implementation Plan, but in no event sooner than January 1, 2026, PSO is required to cease coal fired generation from Unit 3 and will operate exclusively on natural gas.
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	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.	

Interim Milestone	Completed/ Missed/ Delayed?	Narrative Discussion	Updated Milestone (if applicable)
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.			

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,



Aimee Toole
Environmental Director
Water and Ecological Resource Services
American Electric Power

C: Michael Thomas (ODEQ)
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