

October 11, 2024

Via Email: Hzurcher@idem.in.gov, wwreports@idem.in.gov

Indiana Department of Environmental Management Office of Water Quality 100 N. Senate Avenue Indianapolis, IN 46204

## RE: Notice of Planned Participation - Annual Progress Report Rockport Plant; IN0051845 Indiana Michigan Power Company dba American Electric Power (AEP)

Dear Ms. Zurcher,

The Indiana Michigan Power Company (I&M) hereby submits this Notice of Planned Participation (NOPP) Annual Progress Report for the Rockport Plant 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.

I&M has committed to retiring Rockport Unit 1 by December 31, 2028, pursuant to the Consent Decree in *United States et al.*, *v. American Electric Power Service Corp, et al.*, Civil Action No. C2-99-1182 and consolidated cases (U.S. District Court for the S.D. of Ohio). In April 2021, I&M and AEP Generating Company entered into an agreement with the owners of Rockport Unit 2 to purchase the unit at the expiration of the current lease on December 7, 2022. Requested orders from the IURC and the Federal Energy Regulatory Commission (FERC) that were necessary for I&M to proceed with the transaction, with the commitment to retire the unit no later than December 31, 2028, were received.

I&M must prepare and submit an Integrated Resource Plan (IRP) to the IURC and to the MPSC every three years. An IRP was most recently submitted to the IURC and MPSC on January 31, 2022, and February 28, 2022, respectively.

Pursuant to 40 CFR 423.19(g)(4)(iii), I&M will make the appropriate filings to the Regional Transmission Organization detailing its future intentions for the facility (i.e. retirement). It is expected that the filing will be submitted no later than December 31, 2028.

Interim Milestones	Completed/ Missed/ Delayed?	Narrative Discussion	Updated Milestone (if applicable)
I&M to purchase Unit 2 at the expiration of the current lease on December 7, 2022.	Completed.		
Transaction approvals required from the IURC and the Federal Energy Regulatory Commission (FERC)	Completed.	IURC order declining jurisdiction on December 8, 2021, in Cause No. 45546. FERC approval granted on September 9, 2021.	
I&M will acquire Unit 2 at the end of the lease, with the commitment to retire the unit no later than December 31, 2028.	Completed.		
I&M to prepare and submit an Integrated Resource Plan to the IURC and the MPSC every three years.	2022 Submissions completed.	An IRP was most recently submitted to the IURC on January 31, 2022, and to MPSC on February 28, 2022.	The next IRP will be submitted in 3 years (2025), as required.
I&M to receive Order from the IURC by no later than December 15, 2021, regarding the reacquisition of Rockport Unit 2.	Completed.	IURC issued order on December 8, 2021, Cause No. 45546.	

I&M 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 Heather Todhunter (614-716-1715) or via email at hmstoller@aep.com.

Sincerely,

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Tim Lohner, / Environmental Permitting Manager

C: Robert Beller, AEP Shara Hamilton, AEP Heather Todhunter, AEP