MWG
Midwest Generation, LLC

Midwest Generation, LLC
Powerton Generating Station
13082 E. Manito Road
Pekin, Illinois 60087

October 12, 2026

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attention: Compliance Assurance Section, Mail Code #19
2520 W Iles Ave
Springfield, Illinois 62704
Attn: Steve Nightingale

Subject: Effluent Limitation Guidelines Notice of Planned Participation
2026 Annual Progress Report
Midwest Generation, LLC - Powerton Generating Station
Account No. W1798010008
NPDES Permit No. IL0002232

Dear Mr. Nightingale:

In accordance with 40 CFR 423.19(g)(3), Midwest Generation, LLC (MWG) is hereby providing an annual progress report for the Notice of Planned Participation (NOPP) for permanent cessation of coal combustion for the Powerton Generating Station's generating units submitted on October 13, 2021.

Interim Milestones Narrative

A detailed timeline to achieve permanent cessation of coal combustion is provided in Attachment 1. Permanent cessation of coal combustion had previously been estimated to be achieved no later than December 31, 2028; however, Powerton has been subject to multiple qualifying events through PJM Interconnection, L.L.C. (PJM) in 2026.

- February 11, 2026 - PJM and MWG entered into a reliability agreement to continue operations at Powerton until at least September 2030 to help prevent and mitigate the unusual system conditions that impair the reliability of the PJM Region (See Attachment 2).

- July 2, 2026 – In response to MWG's deactivation notice submitted on June 30, 2026 (See Attachment 3), PJM and MWG entered into a reliability agreement to continue operations at Powerton until May 31, 2031 to maintain power grid supply and reliability (See Attachment 4) and MWG withdrew the deactivation notice (See Attachment 5).

While this annual progress report presents the best information available and MWG reaffirms its plans to permanently cease coal combustion and retire the units, the following factors could result in changes to MWG's ELG compliance strategy:

- Regulatory Changes – On December 23, 2025, EPA published the Final Steam Electric ELG Deadline Extension Rule. This final rule or other potential future regulatory changes (including future regulatory changes that result from litigation) could impact MWG's ELG compliance strategy.

- Litigation – Following EPA's issuance of the 2024 Rule, various petitioners representing states, electric utilities, and environmental groups challenged the 2024 Rule in the Eighth Circuit. Although the case is currently held in abeyance, if the Eighth Circuit reaches a decision on the merits of the case, it could impact MWG's ELG compliance strategy.

The factors detailed above could result in changes to MWG's ELG compliance strategy and may result in modification of the October 13, 2021 NOPP. MWG will submit appropriate documentation, pursuant to 40 CFR 423, if changes to the NOPP are needed.

Please contact Ms. Jill Buckley at Jill.Buckley@nrg.com if you have any questions or need any additional information regarding this submittal.

Sincerely,

Chris D. Valentine

Christopher Valentine
Plant Manager
Powerton Generating Station

Attachments

Attachment 1
Detailed Timeline to Achieve Permanent Cessation of Coal Combustion

Action	**Actual/*Proposed* Timeline**
Filed 2028 Permanent Cessation of Coal Combustion NOPP – Units 5 and 6	October 13, 2021
Qualifying Event 1	February 11, 2026
Cease coal-fired operations of Units 5 and 6 date	*September 2030*
Filed Deactivation Notice for Units 5 and 6 with PJM	June 30, 2026
Qualifying Event 2 and subsequent withdrawal of deactivation notice	July 2, 2026
Revised cease coal-fired operations of Units 5 and 6 date	*May 31, 2031*

Attachment 2

February 11, 2026 Qualifying Event

MWG
Midwest Generation, LLC
Powerton Generation Station
13082 E. Manito Rd.
Pekin, IL 61554

March 5, 2026

Via Overnight Mail

Illinois Environmental Protection Agency
Bureau of Water
DWPC Permit Section #15
2520 W Iles Ave
Springfield, IL 62704
Attn: Steve Nightingale

Re: Midwest Generation, LLC – Powerton Generating Station
Account No. W1978010008
NPDES Permit No. IL0002232
Certification Statement for Protections given at 40 CFR §423.18(a)(3)

Dear Mr. Nightingale:

In accordance with the requirements of 40 CFR §423.19(i), this letter and attachments comprise the one-time certification statement required for sources seeking to apply the protections given at 40 CFR §423.18(a)(3). Powerton Generating Station ("Powerton", or "the Station") operates two coal-fired electric generating units ("EGUs"), Unit 5 and Unit 6 (collectively "the Units"), and is located in Pekin, Tazewell County. The Units are subject to the Effluent Limit Guidelines for Steam Electric Power Generators ("ELG") as the applicability is defined in 40 CFR §423.10. Powerton is owned and operated by Midwest Generation, LLC ("MWG").

Information required by 40 CFR §423.19(i)(2)(i)

Requirement	Response
The qualifying event from the list in §423.18(a):	See Attachment 1, a reliability-related agreement with the competent electricity regulator, PJM Interconnection, L.L.C. ("PJM") which results in the Powerton Units operating in a way not contemplated when the certification was made ("the Agreement")
The entity that issued or triggered the event:	PJM
The date that such an event was issued or triggered:	February 11, 2026

The documentation of the qualifying event from PJM is attached as Attachment 1. 40 CFR §423.19(i)(2)(ii). The analysis and accompanying narrative discussion demonstrating that the

Units would have qualified for the subcategory at issue absent the event detailed are included in Attachments 2, 3, and 4. 40 CFR §423.19(i)(2)(iii).

Operation of the Units beyond December 31, 2028 was not contemplated when the Notice of Planned Participation was submitted in October 2021. For reasons described in this certification statement, MWG will make the Units available for the upcoming PJM 2028/2029 delivery year base residual auction. MWG understands that by submitting this certification statement, the Units shall continue to qualify as permanently ceasing the combustion of coal by December 31, 2028 as given at 40 CFR §423.18(b).

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.

If you have any questions regarding this submittal, contact me at Todd.Mundorf@nrg.com or Ms. Jill Buckley at Jill.Buckley@nrg.com.

Sincerely,

Todd Mundorf
Plant Manager
Powerton Generating Station

Enclosures: Attachment 1 – February 11, 2026 Agreement between PJM and MWG
Attachment 2 - Analysis and Narrative Discussion
Attachment 3 - February 10, 2026 Illinois EPA Concurrence
Attachment 4 – February 17, 2026 PJM Letter

Attachment 1 – February 11, 2026 Agreement between PJM and MWG

PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403-2497

Michael Bryson
Senior Vice President, Operations
Michael.Bryson@pjm.com
(610) 666-4659

December 23, 2025

Midwest Generation, LLC
Attn. Bradley Kranz
Powerton Generating Station
13082 E. Manito Road
Pekin, IL 60087

Re: Powerton Generating Station

Dear Mr. Kranz,

PJM understands from Midwest Generation, LLC ("MWG") – the owner of the Powerton Generating Station, which is a 1,538 MW (ICAP) coal-fired generation resource located in Pekin, Illinois – that on October 13, 2021, MWG submitted a Notice of Planned Participation ("NOPP") certification for Powerton Unit 5 and Unit 6 to the Illinois Environmental Protection Agency pursuant to 40 CFR 423.19(g)(1) that states that Powerton Units 5 and 6 will permanently cease coal combustion through retirement of these units by December 31, 2028.

PJM further understands from MWG that if Powerton Units 5 and 6 were to permanently cease operation, 271.5 MW (ICAP) of additional generation resources from the Fisk and Waukegan generation facilities, located in Chicago, Illinois and Waukegan, Illinois, respectively would also permanently deactivate.

As your company is aware, the President and the Secretary of Energy have declared that an "emergency" exists that poses a threat to the reliability and the ability to serve load, including emergent data centers needed to help fuel the United States's advancements in artificial intelligence ("AI"), due to a projected shortage of electric energy and a shortage of facilities for the generation of electric energy.[1] This energy emergency threatens national security and has put pressure on consumers.[2] The Executive Branch has made it national policy to "utilize all

[1] *See, e.g.*, DOE Order 202-25-4, Emergency Order (May 30, 2025), https://www.energy.gov/sites/default/files/2025-05/Federal%20Power%20Act%20Section%20202%28c%29%20PJM%20Interconnection.pdf; DOE Order 202-25-8, Emergency Order (Aug. 28, 2025), https://www.energy.gov/sites/default/files/2025-08/202c%20Order%20No.%20202-25-8.pdf, supply and infrastructure causes and makes worse the high energy prices that devastate Americans, particularly

[2] Exec. Order No. 14156, 90 Fed. Reg. 8433 (Jan. 29, 2025) ("EO 14156") (discussing the national security interest in "a reliable, diversified, and affordable supply of energy" and stating that "our Nation's inadequate energy those living on low- and fixed-incomes."). *See also* Exec. Order No. 14262, 90 Fed. Reg. 15521 (Apr. 14, 2025) ("EO 14262") ("The United States is experiencing an unprecedented surge in electricity demand driven by rapid technological advancements, including the expansion of artificial intelligence data centers and an increase in domestic manufacturing. This increase in demand, coupled with existing capacity challenges, places a significant strain on our Nation's electric grid. Lack of reliability in the electric grid puts the national and economic security of the American people at risk. The United States' ability to remain at the forefront of technological innovation

available power generation resources . . . "[3] to preserve the reliability of the bulk electric power system. Executive Order No. 14262 provides that the Secretary of Energy shall "prevent" consistent with applicable law "an identified generation resource in excess of 50 megawatts of nameplate capacity from leaving the bulk-power system."[4]

The Executive Branch has also articulated principles the industry should be exploring to support grid reliability by, among other things: (1) "safeguard[ing] existing assets and ensur[ing] an uninterrupted and affordable supply of power,"; (2) offering "innovative ways to harness existing capacity"; (3) promoting resource adequacy; (4) "[o]ptimiz[ing] existing grid resources as much as possible" to deliver capacity to the system; and (5) supporting the procurement of capacity from "dispatchable power sources as quickly as possible."[5]

As a PJM Member, MWG has committed to cooperate in the coordinated planning and operation of the facilities within the PJM Region so as to obtain the greatest practicable degree of reliability, compatible economy and other advantages from such coordinated planning and operation in a manner consistent with PJM governing documents.[6]

MWG has also agreed to "[c]ooperate with the other Members and the Office of the Interconnection in the analysis, formulation and implementation of plans to prevent or eliminate conditions that impair the reliability of the PJM Region[.]"[7]

"Consistent with Good Utility Practice, [PJM] shall be authorized to direct or coordinate corrective action, whether or not specified in the PJM Manuals, as necessary to alleviate unusual conditions that threaten the integrity or reliability of the PJM Region, or the regional power system."[8]

The Department of Energy has found that unusual conditions exist in the PJM Region that threaten the integrity or reliability of the PJM Region. Furthermore, the 2027/2028 Base

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depends on a reliable supply of energy from all available electric generation sources and the integrity of our Nation's electric grid.").

[3] *See* EO 14262, 90 Fed. Reg. 15521 ("It is the policy of the United States to ensure the reliability, resilience, and security of the electric power grid. It is further the policy of the United States that in order to ensure adequate and reliable electric generation in America, to meet growing electricity demand, and to address the national emergency declared pursuant to [EO 14156], our electric grid must utilize all available power generation resources, particularly those secure, redundant fuel supplies that are capable of extended operations.").

[4] *Id.* at 15522 (stating that the Secretary of Energy should "prevent," as he "deems appropriate and consistent with applicable law . . . an identified generation resource in excess of 50 megawatts of nameplate capacity from leaving the bulk-power system or converting the source of fuel of such generation resource if such conversion would result in a net reduction in accredited generating capacity").

[5] *See* The White House, Winning the Race: America's AI Action Plan, at 15-16 (July 2025), https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf.

[6] Operating Agreement, section 11.3.2.

[7] *Id.* at section 11.3.2(g); *see also* section 11.3.2(b).

[8] Tariff, Attachment K-Appendix, section 1.7.15; *see also* Operating Agreement, section 11.3.4.

Residual Auction results released on December 17, 2025 indicate that PJM procured short of its reliability requirement by 6,623 MW, meaning that the committed supply is less than what would be required to meet the one-event-in-10-year reliability standard of a 20% reserve margin.

Considering present facts and pursuant to PJM's authority, PJM requests MWG's cooperation in formulating and implementing a plan to help prevent and mitigate these unusual system conditions that impair the reliability of the PJM Region. Specifically, PJM requests MWG's cooperation to take all necessary steps consistent with 40 C.F.R. § 423.18(a)(3),[9] to avoid deactivation of the Powerton Generating Station by December 31, 2028, including continued operation until at least September 2030, which will also have the impact of preserving the availability of the Fisk and Waukegan units to provide generation support to the PJM Region. PJM will continue to work with MWG to assess the impact, if any, of the Illinois Climate and Equitable Jobs Act ("CEJA") on the Powerton Generating Station's operations.

As a Regional Transmission Organization and independent system operator, PJM Interconnection, L.L.C. ("PJM") fits within the meaning of a "competent electricity regulator" as that term is used in 40 C.F.R. § 423.18(a)(3). PJM understands that if MWG is willing to continue operating the Powerton Generating Station beyond December 31, 2028, the facility would be operating in a way not contemplated when Powerton Generating Station made its NOPP certification.

Please have a duly authorized officer of MWG respond as soon as possible to this letter to signify whether PJM's proposed plan is agreeable to support system reliability in the PJM Region.

Regards,

/s/Michael E. Bryson
Michael E. Bryson
Senior Vice President, Operations
PJM Interconnection, L.L.C.

On behalf of PJM Interconnection, L.L.C.

[9] 40 CFR § 423.18 (a)(3) states:

All permits subject to this part shall include the following permit conditions:

(a) An electric generating unit shall qualify as a low utilization electric generating unit, permanently ceasing the combustion of coal by December 31, 2028, or permanently ceasing the combustion of coal by December 31, 2034, if such qualification would have been demonstrated absent the following qualifying event:

* * *

(3) Any other reliability-related order, energy emergency alert, or agreement issued by a competent electricity regulator (*e.g.*, an independent system operator) which results in that electric generating unit operating in a way not contemplated when the certification was made; or

PROPOSED PLAN AGREED AND ACCEPTED ON THIS 11th DAY OF ~~DECEMBER~~ February, 2026, ~~2025~~:

MIDWEST GENERATION, LLC

Name: Bradley Kranz

Title: President

Attachment 2 – Analysis and Narrative Discussion

Attachment 2 – Analysis and Narrative Discussion

Pursuant to 40 CFR §423.19(g)(1), Midwest Generation, LLC ("MWG") submitted a Notice of Planned Participation ("NOPP") for Powerton Generating Station Unit 5 and Unit 6 ("Units") on October 13, 2021, stating that the Units would permanently cease coal combustion and retire no later than December 31, 2028. In accordance with 40 CFR §423.19(g)(3), MWG has filed NOPP Annual Progress Reports reaffirming plans to permanently cease coal combustion and retire the units.

In December 2025, PJM completed the base residual auction ("auction") for the 2027/2028 delivery year. The PJM delivery year runs from June 1 through May 31 of the following year. Results of the 2027/2028 auction showed that PJM is below its required Installed Reserve Margin target of 20%.[1] Accordingly, due to these facts and pursuant to PJM's authority, on December 23, 2025, PJM requested MWG's cooperation to help prevent and mitigate the unusual system conditions that impair the reliability of the PJM Region and proposed an Agreement to MWG to avoid deactivation of the Units by December 31, 2028 (the "Agreement"). *See* Attachment 1.

Before signing the Agreement, MWG reached out to the permitting authority, Illinois Environmental Protection Agency ("Illinois EPA"), to concur that the Agreement would be a qualifying event as described in 40 CFR §423.18(a)(3). On February 10, 2026, Illinois EPA concurred that the Agreement was consistent with 40 C.F.R. 423.18(a)(3) and its overall purpose "to allow an EGU to operate for reliability purposes without violating its CWA permit." *See* Attachment 3.

On February 11, 2026, MWG signed the Agreement with PJM. *See* Attachment 1.

Additionally, PJM's Chair of the Board of Managers and Interim President and CEO, David E. Mills, sent a letter to Illinois Governor Pritzker and former New Jersey Governor Phil Murphy[2] restating PJM's concern about retirements of current generating resources in its concluding sentences:

> "Losing existing supply in the near term will exacerbate both the reliability and affordability challenges. As such, existing reliability safety valve measures built into your statutory/regulatory frameworks should be invoked to delay these retirements."
> *See* Attachment 4.

In accordance with 40 CFR §423.18(a), the Units remain in the category and qualify as units permanently ceasing combustion of coal by December 31, 2028. Absent the agreement, MWG would have filed retirement notices with PJM the Units by February 15, 2026, removing 1,538 MW of installed capacity from service.[3]

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[1] PJM's 2027/2028 Base Residual Auction Report, December 17, 2025 found at pjm.com.

[2] Mr. Murphy's tenure as Governor of New Jersey ceased on January 20, 2026.

[3] MWG complies with 35 IAC Part 217 Subpart V by emissions averaging across its operating fleet. Retirement of Powerton will cause retirement of peaking EGUs at Fisk Station and Waukegan Station, an additional 272 MW of installed capacity.

Attachment 3 – February 10, 2026 Illinois EPA Concurrence

From: Armstrong, Andrew <Andrew.Armstrong@Illinois.gov>
Sent: Tuesday, February 10, 2026 4:28 PM
To: Stone, Walter; Shealey, Sharene
Subject: 40 C.F.R. 423.18(a)(3)
Attachments: 2025.12.23 - PJM letter to MWG re Powerton - Bryson.pdf

Some people who received this message don't often get email from andrew.armstrong@illinois.gov. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Stone and Ms. Shealey:

You have contacted Illinois EPA concerning the attached letter from PJM to Midwest Generation, LLC ("MWG"), dated December 23, 2025. In this letter, PJM "requests MWG's cooperation in formulating and implementing a plan to help prevent and mitigate . . . unusual system conditions that impair the reliability of the PJM Region," more specifically requesting that MWG "take all necessary steps consistent with 40 C.F.R. § 423.18(a)(3), to avoid deactivation of the Powerton Generating Station by December 31, 2028 . . . ." (page 3). PJM further requests that NRG sign the letter and return it to PJM to signify that PJM's "proposed plan" is "agreeable" to NRG (*id.*). In support of these requests, PJM cites to its authority under its Tariff "to direct or coordinate corrective action, whether or not specified in the PJM Manuals, as necessary to alleviate unusual conditions that threaten the integrity or reliability of the PJM Region, or the regional power system" (page 2).

You have requested Illinois EPA's concurrence that, if executed, this letter agreement could constitute a "qualifying event" under 40 C.F.R. 423.18(a)(3). This paragraph provides, in pertinent part, as follows:

> (a) An electric generating unit shall qualify as . . . permanently ceasing the combustion of coal by December 31, 2028, . . . if such qualification would have been demonstrated absent the following qualifying event:
>
> * * *
>
> (3) Any other reliability-related order, energy emergency alert, or agreement issued by a competent electricity regulator (*e.g.*, an independent system operator) which results in that electric generating unit operating in a way not contemplated when the certification was made . . . .

Illinois EPA has reviewed PJM's letter, 40 C.F.R. Part 423, and USEPA rulemaking materials associated with the regulations. Based on this review, Illinois EPA concurs that, if executed, this letter agreement could constitute a reliability-related agreement issued by PJM, consistent with 40 C.F.R. 423.18(a)(3) and its overall purpose "to allow an EGU to operate for reliability purposes without violating its CWA permit." https://www.federalregister.gov/d/2024-09185/p-958

Please note that this concurrence is limited only to Illinois EPA's interpretation of 40 C.F.R. 423.18(a)(3). Illinois EPA is not by this concurrence expressing any opinion on the contents of PJM's letter. This

concurrence is contingent upon MWG meeting all other requirements of Part 423, including timely and complete submission of the related certification required by 40 C.F.R. 423.19(i). This concurrence does not in any way address any other requirements applicable to the Powerton generating station, including the Illinois Climate and Equitable Jobs Act, or any requirements related to the Fisk and Waukegan generating stations. Further, this concurrence concerns only this individual letter agreement, not any additional actions that PJM or another electricity regulator might take relative to the Powerton generating station.

If you have any questions, please feel free to contact me.



Andrew Armstrong
Chief Legal Counsel
217-836-3369
andrew.armstrong@illinois.gov

Join our team: Illinois EPA Employment

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege.

PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403-2497

Michael Bryson
Senior Vice President, Operations
Michael.Bryson@pjm.com
(610) 666-4659

December 23, 2025

Midwest Generation, LLC
Attn. Bradley Kranz
Powerton Generating Station
13082 E. Manito Road
Pekin, IL 60087

Re: Powerton Generating Station

Dear Mr. Kranz,

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PJM further understands from MWG that if Powerton Units 5 and 6 were to permanently cease operation, 271.5 MW (ICAP) of additional generation resources from the Fisk and Waukegan generation facilities, located in Chicago, Illinois and Waukegan, Illinois, respectively would also permanently deactivate.

As your company is aware, the President and the Secretary of Energy have declared that an "emergency" exists that poses a threat to the reliability and the ability to serve load, including emergent data centers needed to help fuel the United States's advancements in artificial intelligence ("AI"), due to a projected shortage of electric energy and a shortage of facilities for the generation of electric energy.[1] This energy emergency threatens national security and has put pressure on consumers.[2] The Executive Branch has made it national policy to "utilize all

[1] *See, e.g.*, DOE Order 202-25-4, Emergency Order (May 30, 2025), https://www.energy.gov/sites/default/files/2025-05/Federal%20Power%20Act%20Section%20202%28c%29%20PJM%20Interconnection.pdf; DOE Order 202-25-8, Emergency Order (Aug. 28, 2025), https://www.energy.gov/sites/default/files/2025-08/202c%20Order%20No.%20202-25-8.pdf. supply and infrastructure causes and makes worse the high energy prices that devastate Americans, particularly

[2] Exec. Order No. 14156, 90 Fed. Reg. 8433 (Jan. 29, 2025) ("EO 14156") (discussing the national security interest in "a reliable, diversified, and affordable supply of energy" and stating that "our Nation's inadequate energy those living on low- and fixed-incomes."). *See also* Exec. Order No. 14262, 90 Fed. Reg. 15521 (Apr. 14, 2025) ("EO 14262") ("The United States is experiencing an unprecedented surge in electricity demand driven by rapid technological advancements, including the expansion of artificial intelligence data centers and an increase in domestic manufacturing. This increase in demand, coupled with existing capacity challenges, places a significant strain on our Nation's electric grid. Lack of reliability in the electric grid puts the national and economic security of the American people at risk. The United States' ability to remain at the forefront of technological innovation

available power generation resources . . . "[3] to preserve the reliability of the bulk electric power system. Executive Order No. 14262 provides that the Secretary of Energy shall "prevent" consistent with applicable law "an identified generation resource in excess of 50 megawatts of nameplate capacity from leaving the bulk-power system."[4]

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As a PJM Member, MWG has committed to cooperate in the coordinated planning and operation of the facilities within the PJM Region so as to obtain the greatest practicable degree of reliability, compatible economy and other advantages from such coordinated planning and operation in a manner consistent with PJM governing documents.[6]

MWG has also agreed to "[c]ooperate with the other Members and the Office of the Interconnection in the analysis, formulation and implementation of plans to prevent or eliminate conditions that impair the reliability of the PJM Region[.]"[7]

"Consistent with Good Utility Practice, [PJM] shall be authorized to direct or coordinate corrective action, whether or not specified in the PJM Manuals, as necessary to alleviate unusual conditions that threaten the integrity or reliability of the PJM Region, or the regional power system."[8]

The Department of Energy has found that unusual conditions exist in the PJM Region that threaten the integrity or reliability of the PJM Region. Furthermore, the 2027/2028 Base

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[6] Operating Agreement, section 11.3.2.

[7] *Id.* at section 11.3.2(g); *see also* section 11.3.2(b).

[8] Tariff, Attachment K-Appendix, section 1.7.15; *see also* Operating Agreement, section 11.3.4.

Residual Auction results released on December 17, 2025 indicate that PJM procured short of its reliability requirement by 6,623 MW, meaning that the committed supply is less than what would be required to meet the one-event-in-10-year reliability standard of a 20% reserve margin.

Considering present facts and pursuant to PJM's authority, PJM requests MWG's cooperation in formulating and implementing a plan to help prevent and mitigate these unusual system conditions that impair the reliability of the PJM Region. Specifically, PJM requests MWG's cooperation to take all necessary steps consistent with 40 C.F.R. § 423.18(a)(3),[9] to avoid deactivation of the Powerton Generating Station by December 31, 2028, including continued operation until at least September 2030, which will also have the impact of preserving the availability of the Fisk and Waukegan units to provide generation support to the PJM Region. PJM will continue to work with MWG to assess the impact, if any, of the Illinois Climate and Equitable Jobs Act ("CEJA") on the Powerton Generating Station's operations.

As a Regional Transmission Organization and independent system operator, PJM Interconnection, L.L.C. ("PJM") fits within the meaning of a "competent electricity regulator" as that term is used in 40 C.F.R. § 423.18(a)(3). PJM understands that if MWG is willing to continue operating the Powerton Generating Station beyond December 31, 2028, the facility would be operating in a way not contemplated when Powerton Generating Station made its NOPP certification.

Please have a duly authorized officer of MWG respond as soon as possible to this letter to signify whether PJM's proposed plan is agreeable to support system reliability in the PJM Region.

Regards,

/s/Michael E. Bryson
Michael E. Bryson
Senior Vice President, Operations
PJM Interconnection, L.L.C.

On behalf of PJM Interconnection, L.L.C.

---

[9] 40 CFR § 423.18 (a)(3) states:

All permits subject to this part shall include the following permit conditions:

(a) An electric generating unit shall qualify as a low utilization electric generating unit, permanently ceasing the combustion of coal by December 31, 2028, or permanently ceasing the combustion of coal by December 31, 2034, if such qualification would have been demonstrated absent the following qualifying event:

* * *

(3) Any other reliability-related order, energy emergency alert, or agreement issued by a competent electricity regulator (*e.g.*, an independent system operator) which results in that electric generating unit operating in a way not contemplated when the certification was made; or

PROPOSED PLAN AGREED AND ACCEPTED ON THIS _____ DAY OF DECEMBER, 2025:

MIDWEST GENERATION, LLC

_____

Name: Bradley Kranz

Title: President

Attachment 4 – February 17, 2026 PJM Letter

David Mills
Interim President & CEO

PJM Interconnection
2750 Monroe Blvd.
Audubon, PA 19403

February 17, 2026

Honorable JB Pritzker
Office of the Governor
401 S. Spring St.
Springfield, IL 62704

Honorable Phil Murphy
New Jersey State House
P.O. Box 001
Trenton, NJ 08625

Dear Gov. Pritzker and former Gov. Murphy,

Thank you for your joint letter and for your continued engagement on issues central to PJM. We appreciate the concern that you have expressed for the consumers in your state. PJM is a mission-driven organization serving 67 million consumers, and thus, we share your concern.

We also appreciate your acknowledgement that supply/demand fundamentals are causing the affordability challenge for your consumers. We understand the difficult position that governors in our footprint face in both inviting data center growth for their economic development benefits, while simultaneously contending with electricity price increases that result from the data centers' demand for electricity. While we do not recall receiving a correspondence from your administration stating that "ratepayers must not shoulder the burden caused by new large load users," your intention is now clear based upon your endorsement of the principles advanced by the Trump Administration (Principles) and the other governors in our footprint.

As the Principles recognize, if the policy of the federal government and our states is to allow for the rapid interconnection of data centers, the only solution to both maintain grid reliability and tame high pricing is to bring substantial new supply to the system. The PJM Board of Managers (Board) recently published its decision in its Critical Issue Fast Path (CIFP) stakeholder process for large load additions, calling for the immediate initiation of a procurement process to meet supply shortages identified through PJM capacity auctions. PJM's decision went further in its consumer protection than the proposal brought by New Jersey itself (along with Pennsylvania, Maryland and Virginia) by initiating a "connect and manage" framework where PJM will seek to have data centers move to their backup generators prior to needing to shed residential load.

The states will be a critical part of the discussion going forward on cost allocation, curtailment responsibility, and on the backstop mechanism itself. If the backstop is to be successful, supply resources that are identified through the backstop will need to ultimately be sited, permitted and constructed, as will the transmission improvements allowing for those resources to be interconnected. This is firmly in the states' hands. As the Principles further recognize, PJM does not control cost allocation to retail customer classes. PJM does not, for instance, have the authority to say what share of wholesale costs that residential, industrial and other customer classes will pay. This is within the authority of the states, and the Principles, specifically the final principle, acknowledge this jurisdictional reality.

As to the generation interconnection queue, that process is fully transformed and open to new projects. Any project that enters the queue today will be electrically studied and will receive its agreement to interconnect in a one- to two-year time frame. Furthermore, approximately 57 GW worth of projects currently have their agreements and have no further study obligations with PJM. We have attached a state-by-state breakdown of these projects to this letter. As these projects are our most viable path to obtaining new supply, we encourage you to work with the developers of these projects to determine their needs to support their construction.

Finally, as we acknowledge that we are currently experiencing a supply/demand imbalance that is leading to affordability challenges, we must express our concern about any state mandate that serves to disadvantage or inefficiently restrict existing supply resources. Losing existing supply in the near term will exacerbate both the reliability and affordability challenges. As such, existing reliability safety valve measures built into your statutory/regulatory frameworks should be invoked to delay these retirements.

Thank you again for your correspondence.

Sincerely,

David E. Mills
Chair, PJM Board of Managers
Interim President & CEO

Projects Through Generation Interconnection Queue By State

The below represents generation projects that have a fully executed Generation Interconnection Agreements (GIAs) and are in a construction status designation (In Service Partial, Under Construction, Suspended, or Engineering/Procurement). Approximately 9 GW of projects have their GIAs but have not yet entered one of these construction status designations.

State	# of Projects	MW Energy
Delaware	11	419
Illinois	30	3,868
Indiana	49	7,468
Kentucky	18	1,882
Maryland	21	1,739
Michigan	8	1,035
North Carolina	16	1,476
New Jersey*	29	2,639
Ohio	84	9,444
Pennsylvania	91	3,407
Virginia	98	12,189
West Virginia	15	2,831
Total	**470**	**48,397**

*Included in the NJ statistics are Orsted's two offshore wind ISA projects totaling 1,248 MW

Attachment 3

PJM Deactivation Notice

June 30, 2026

Michael Bryson
Senior Vice President, Operations
PJM Interconnection, LLC
2750 Monroe Blvd.
Audubon, PA 19403

Dear Mr. Bryson:

Midwest Generation LLC ("MWG") provides this response to your correspondence dated May 16, 2026. MWG owns Fisk Units 31-34; Powerton Units 5-6; and Waukegan Units 31-32 (collectively, the "Units"). Pursuant to the Illinois Climate and Equitable Jobs Act ("CEJA"), the Units are required to "permanently reduce all CO2e and copollutant emissions to zero, including through unit retirement" by January 1, 2030.[1] As such, MWG intends to retire the Units on January 1, 2030.

Included with this correspondence and consistent with Section 9.15 of CEJA, MWG is submitting a formal deactivation notice pursuant to Part V of the PJM Tariff.

Per your correspondence, MWG would operate the Units beyond January 1, 2030 if it was determined by PJM that the units must remain in operation pursuant to the reliability provisions set forth in CEJA and the terms of the request are consistent with the below.

We are also aware that the Clean and Reliable Grid Affordability Act ("CRGA") is meant to address resource adequacy in the state through an integrated resource planning process, and that in the Integrated Resource Plan contemplated under CRGA will be final in January 2028, if approved by the General Assembly. In light of this timeline, MWG's commitment to continue to operate the Units beyond January 1, 2030, if PJM determines they are needed, is contingent on a commitment from PJM to continue to operate the Units through the 2029/2030 and 2030/2031 delivery years and appropriate compensation.

We appreciate PJM's willingness to collaborate on this matter.

Sincerely,

Bradley Kranz
President
Midwest Generation, LLC

[1] Public Act 102-0662 at section 9.15, subsection (i)(1)

NRG Energy, Inc.
804 Carnegie Center
Princeton, NJ 08540

June 30, 2026

VIA EMAIL

Michael Bryson
Senior Vice President, Operations
PJM Interconnection, LLC
2750 Monroe Boulevard
Audubon, PA 19403

RE: Deactivation of Powerton, Fisk, and Waukegan Generating Stations

Dear Mr. Bryson:

On behalf of Midwest Generation LLC ("MWG") and pursuant to Part V, Section 113 of the PJM Open Access Transmission Tariff ("OATT"), please accept this Deactivation Notification of the following units:

Unit	Unit ICAP (MW)
POWERTON COAL 5	769
POWERTON COAL 6	769
FISK CT 31	49.1
FISK CT 32	50.8
FISK CT 33	47.9
FISK CT 34	22.9
WAUKEGAN CT 31	52.5
WAUKEGAN CT 32	48.3

MWG respectfully requests an effective Deactivation Date for the purpose of retirement of January 1, 2030. MWG is deactivating these units due to uneconomic compliance requirements of the Illinois Climate and Equitable Jobs Act. In the event PJM determines that this unit is needed for reliability purposes, MWG will provide estimates of the costs and timing of additional expenditures to maintain the facilities.

Sincerely,

Bradley Kranz
President
Midwest Generation, LLC

Cc: Joseph Bowring, Independent Market Monitor for PJM
generatordeactivation@pjm.com

Attachment 4
July 2, 2026 Qualifying Event

MWG
Midwest Generation, LLC
Powerton Generation Station
13082 E. Manito Rd.
Pekin, IL 61554

July 31, 2026

Via Overnight Mail

Illinois Environmental Protection Agency
Bureau of Water, DWPC Permit Section #15
2520 W Iles Ave
Springfield, IL 62704
Attn: Steve Nightingale

Re: Midwest Generation, LLC – Powerton Generating Station
NPDES Permit No. IL0002232, Account No. W1978010008
Certification Statement for Protections given at 40 CFR §423.18(a)(3)

Dear Mr. Nightingale:

In accordance with the requirements of 40 CFR §423.19(i), this letter and attachment comprise a certification statement ("Certification Statement") for Powerton Generating Station ("Powerton", or "the Station"), required for sources seeking to apply the protections given at 40 CFR §423.18(a)(3). This Certification Statement for Powerton Generating Station is in addition to the certification statement provided to Illinois EPA in a submittal dated March 5, 2026, which is incorporated by reference[1]. Powerton operates two coal-fired electric generating units ("EGUs"), Unit 5 and Unit 6 (collectively "the Units"), and is located in Pekin, Tazewell County. The Units are subject to the Effluent Limit Guidelines for Steam Electric Power Generators ("ELG") as the applicability is defined in 40 CFR §423.10. Powerton is owned and operated by Midwest Generation, LLC ("MWG").

To comply with both the Illinois Climate and Equitable Jobs Act ("CEJA")[2] and PJM Interconnection, L.L.C. ("PJM") rules, on June 30, 2026, MWG filed deactivation notices for the Powerton Units, the oil-fired combustion turbines at Fisk Generating Station, and the oil-fired combustion turbines at Waukegan Generating Station. In the deactivation notices, MWG stated that each EGU would deactivate on or before December 31, 2029. PJM responded to MWG's deactivation notices on July 2, 2026, and pursuant to its authority under CEJA requested that the Powerton, Fisk, and Waukegan units remain available to generate electricity:

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[1] See www.nrg.com legal coal-combustion-residuals.html
[2] Public Act 102-0662, see section 9.15(g).

"Pursuant to the authority provided to PJM under CEJA and based on the justification provided below, PJM requests the continued operation of the MWG resources until May 31, 2031."

PJM's July 2, 2026 letter, countersigned by MWG, is included as Attachment 5[3] and is the documentation of the qualifying event. 40 CFR §423.19(i)(2)(ii). Responses to the information required by 40 CFR §423.19(i)(2)(i) are provided in the table below:

Information required by 40 CFR §423.19(i)(2)(i)

Requirement	Response
The qualifying event from the list in §423.18(a):	See Attachment 5, PJM's Notice of Temporary Continued Operation of Midwest Generation resources (the "Notice"). Like the Agreement included in the March 5, 2026 submittal, the Notice results in the Powerton Units operating in a way not contemplated when the Notice of Planned Participation certification was made
The entity that issued or triggered the event:	PJM
The date that such an event was issued or triggered:	July 2, 2026

The analysis and accompanying narrative discussion demonstrating that the Units would have qualified for the subcategory at issue absent the event detailed is included as Attachment 6. 40 CFR §423.19(i)(2)(iii).

Operation of the Units beyond December 31, 2028 was not contemplated when the ELG Notice of Planned Participation was submitted in October 2021. For reasons described in the March 5, 2026 submittal and this Certification Statement, MWG will make the Powerton Units available through May 31, 2031. MWG understands that by submitting this Certification Statement, the Units shall continue to qualify as permanently ceasing the combustion of coal by December 31, 2028 as given at 40 CFR §423.18(b).

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,

[3] The March 5, 2026 certification statement included Attachments 1-4.

and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions regarding this submittal, contact me at Todd.Mundorf@nrg.com or Ms. Jill Buckley at Jill.Buckley@nrg.com.

Sincerely,

Todd Mundorf
Plant Manager
Powerton Generating Station

Enclosures: Attachment 5 – PJM's Notice of Temporary Continued Operation of Midwest Generation Resources, July 2, 2026
Attachment 6 – Analysis and Narrative Discussion

Attachment 5 – PJM's Notice of Temporary Continued Operation of Midwest Generation Resources, July 2, 2026

PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403-2497

Michael Bryson
Senior Vice President, Operations
Michael.Bryson@pjm.com
(610) 666-4659

July 2, 2026

Bradley Kranz
Vice President Asset Management
NRG Energy, Inc.
NRG Tower
1301 McKinney Street
Houston, TX 77010

Re: Notice of Temporary Continued Operation of Midwest Generation resources

Dear Mr. Kranz,

PJM received a deactivation notice from NRG Energy, Inc. (NRG), parent company of Midwest Generation, LLC ("MWG"), the owner and operator of Fisk Units 31-34; Powerton Units 5-6; and Waukegan Units 31-32 (collectively, the MWG resources).

The generation resources listed in the Appendix (Applicable MWG resources), which consist of oil- and coal-fired resources totaling approximately 1,810 MW (ICAP) – that, in order to comply with the Illinois Climate and Equitable Jobs Act (CEJA)[1], the resources will deactivate on or before December 31, 2029.

This will impact the resources' participation as capacity resources in PJM's 2029/2030 Delivery Year, and as such, per PJM rules, the resources will need to apply by July 27, 2026, for a must-offer exception to the 2029/2030 Base Residual Auction (BRA).[2] Pursuant to the authority provided to PJM under CEJA and based on the justification provided below, PJM requests the continued operation of the MWG resources until May 31, 2031.

Resource Adequacy Concerns

PJM's most recent auction for generation capacity, the 2027/2028 Base Residual Auction, with results[3] released on December 17, 2025, indicates that PJM procured short of its reliability requirement by 6,623 MW, meaning that the committed supply is less than what would be required to meet the one-event-in-10-year reliability standard of a 20% reserve margin. Illinois' recent Resource Adequacy Study,[4] released on December 15, 2025, assessed resource adequacy

[1] Public Act 102-0662, section 9.15(l).
[2] Base Residual Auction Schedule, see sheet entitled *29/30 BRA Post.* Additionally, per PJM Manual 14, Section 9.1.1 – An existing resource that intends to retire on January 1, 2030, may not notify PJM any earlier than October 1, 2028.
[3] PJM 2027/2028 Base Residual Auction Report
[4] PJM 2025 Resource Adequacy Study

needs and risk in the near- to medium-term (2026 through 2035) and found that "PJM is expected to experience a capacity shortfall beginning in 2029, with the deficit projected to widen in subsequent years if left unabated." North American Electric Reliability Corporation's (NERC) 2025 Long-Term Reliability Assessment shows PJM as High-Risk beginning in 2029.[5] Recent projections for PJM's Reliability Backstop process point to a potential 55 GW deficit over the next decade.[6]

Retirement Impacts

The retirement of the MWG resources, along with over 3,630 MW of additional applicable generation in Illinois by 2030 would result in significant thermal-based and voltage-based reliability criteria violations according to PJM's analysis of CEJA.[7] The thermal-based violations are due to the significant increase in power imported from east to west to replace the energy currently provided by the retiring generation, and the voltage-based violations are due to the loss of reactive power currently provided by the retiring generation. The upgrade costs to address these reliability criteria violations due to the 2030 retirements were estimated at over $700M. Since this study was completed, the forecast loads for 2030 in PJM as a whole, and COMED individually, have increased by 30%.[8] PJM's most recent capacity market planning parameters showed a 60% decline in the ability of the COMED Locational Deliverability Area's ability to import the energy needed during an emergency.[9] Loss of the MWG resources would impact the provision of critical ancillary services, and the ability to restore the grid. Additionally, the retirement of the MWG resources would have the local grid impacts, as further outlined in the Appendix. It is important to note that even before accounting for the potential loss of the MWG resources, ComEd's CETL/CETO margin is already deficient at 59%, causing the ComEd zone to fail the Load Deliverability analysis. This is because multiple ComEd internal 345 kV lines are binding due to base case conditions. The loss of the MWG resources would further reduce the CETL/CETO margin in ComEd.

CEJA Reliability Provisions and Generator Obligations to PJM

CEJA wisely provides the ability for a generating unit to temporarily continue operating should the Regional Transmission Organization, in this case PJM, determine that "ongoing operation of the EGU is necessary to maintain power grid supply and reliability."[10] PJM expressed the need to use such "existing reliability safety-valve measures" in our communication to Governor Pritzker earlier this year.[11] Accordingly, due to the aforementioned current and projected shortage of capacity resources in PJM, PJM has determined that the MWG resources are needed to continue operating until the projected shortage is resolved or until the integrated resource planning process below has taken effect to resolve the shortage.

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[5] NERC 2025 LTRA In high-risk areas, planned resources as of July 2025 would result in energy shortfalls that exceed resource adequacy targets or baseline criteria for unserved energy or loss of load.
[6] Discussion Around Goals, Principles and Elements of a Reliability Backstop Procurement, slide 15
[7] Illinois Generation Retirement Study
[8] 2026 PJM Load Forecast Report and 2022 PJM Load Forecast Report
[9] 2028/2029 RPM Base Residual Auction Planning Period Parameters
[10] Public Act 102-0662 at Section 9.15, subsection (l).
[11] PJM Board Response to IL Governor and NJ Former Governor Regarding National Energy Dominance Council and 13 Governors' Statement of Principles

As a PJM Member, NRG has committed to cooperate in the coordinated planning and operation of the facilities within the PJM Region to obtain the greatest practicable degree of reliability, compatible economy and other advantages from such coordinated planning and operation in a manner consistent with PJM governing documents.[12]

NRG has also agreed to "[c]ooperate with the other Members and the Office of the Interconnection in the analysis, formulation and implementation of plans to prevent or eliminate conditions that impair the reliability of the PJM Region[.]"[13]

"Consistent with Good Utility Practice, [PJM] shall be authorized to direct or coordinate corrective action, whether or not specified in the PJM Manuals, as necessary to alleviate unusual conditions that threaten the integrity or reliability of the PJM Region, or the regional power system."[14]

Clean and Reliable Grid Affordability Act (CRGA) Integrated Resource Planning

Considering present facts and pursuant to PJM's authority, PJM requests NRG's cooperation in formulating and implementing a plan to help prevent and mitigate these unusual system conditions that impair the reliability of the PJM Region. Specifically, PJM requests NRG's cooperation to take all necessary steps consistent with CEJA to avoid deactivation of the MWG resources on or before December 31, 2029, including continued operation at least through May 31, 2031. This short extension will allow you to participate in the upcoming 2029/2030 and 2030/2031 capacity auctions.

This will also have the impact of preserving the resource to allow for reliable and affordable development of the Integrated Resource Plan[15] pursuant to the Clean and Reliable Grid Affordability Act (CRGA).[16] It is our understanding that Illinois' recently passed CRGA is meant to address resource adequacy in the state through an integrated resource planning process. PJM will assess the need for continued operation of the MWG resources prior to each delivery year, beginning with the 2031/2032 Delivery Year.

Please have a duly authorized officer of NRG respond as soon as possible to this letter to signify whether PJM's proposed plan is agreeable to support system reliability in the PJM Region.

Regards,

/s/Michael E. Bryson
Michael E. Bryson
Senior Vice President, Operations
PJM Interconnection, L.L.C.

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[12] Operating Agreement, section 11.3.2.
[13] *Id.* at section 11.3.2(g); *see also* section 11.3.2(b).
[14] Tariff, Attachment K-Appendix, section 1.7.15; *see also* Operating Agreement, section 11.3.4.
[15] Illinois Integrated Resource Plan
[16] Public Act 104-0458

On behalf of PJM Interconnection, L.L.C.

PROPOSED PLAN AGREED AND ACCEPTED ON THIS 2nd DAY OF July, 2026:

[XXXX]

Name: Bradley Kranz

Title: President - MWG

APPENDIX

APPLICABLE MIDWEST GENERATION RESOURCES

Fisk: Units 31, 32, 32 and 34, @ 171 MW, Chicago, IL

- **In a sensitivity where 13 at-risk CEJA units were modeled as deactivated in the 2026 RTEP 5 Year (Year 2031) power flow case, PJM found that continued dispatch of Fisk would reduce overloads otherwise observed. Thus, continued operation of Fisk, in combination with continued operation of other units, could mitigate observed overloads. Alternatively, continued operation of Fisk would increase system headroom, which has the potential to reduce costs for new generation and load interconnections.**

Powerton: Units 5 and 6, @ 1,538 MW, Pekin, IL

- **In a sensitivity where 13 at-risk CEJA units were modeled as deactivated in the 2026 RTEP 5 Year (Year 2031) power flow case, PJM found that continued dispatch of Powerton would mitigate or reduce overloads otherwise observed. Thus, continued operation of Powerton, possibly itself or in combination with continued operation of other units, could mitigate observed overloads. Alternatively, continued operation of Powerton would increase system headroom, which has the potential to reduce costs for new generation and load interconnections.**

Waukegan: Units 31 and 32, @ 101 MW, Waukegan, IL

- **In a sensitivity where 13 at-risk CEJA units were modeled as deactivated in the 2026 RTEP 5 Year (Year 2031) power flow case, PJM found that continued dispatch of Waukegan would increase system headroom, which has the potential to reduce costs for new generation and load interconnections.**

Attachment 6 – Analysis and Narrative Description

Attachment 6 – Analysis and Narrative Discussion

Pursuant to 40 CFR §423.19(g)(1), Midwest Generation, LLC ("MWG") submitted a Notice of Planned Participation ("NOPP") for Powerton Generating Station Unit 5 and Unit 6 ("Units") on October 13, 2021, stating that the Units would permanently cease coal combustion and retire no later than December 31, 2028. In accordance with 40 CFR §423.19(g)(3), MWG has filed NOPP Annual Progress Reports reaffirming plans to permanently cease coal combustion and retire the units.

In December 2025, PJM Interconnection, LLC ("PJM") requested MWG's cooperation to help prevent and mitigate the unusual system conditions that impair the reliability of the PJM Region and proposed an agreement to MWG to avoid deactivation of the Units by December 31, 2028 ("First Agreement"). In February 2026, MWG signed the First Agreement with PJM and provided a certification statement to the Illinois Environmental Protection Agency ("Illinois EPA"), dated March 5, 2026. The First Agreement requested that MWG make the Powerton Units available through September 2030.

On June 30, 2026, MWG filed deactivation notices for the Powerton Units to comply with both the PJM rules for participation in the PJM Delivery Year 2029/2030 Base Residual Auction and the January 1, 2030 zero-emissions deadline given in the Illinois Climate and Equitable Jobs Act. In response to the deactivation notices, on July 2, 2026, PJM proposed a second agreement for temporary continued operation of the Powerton Units and other MWG resources located in Illinois through May 31, 2031 ("Second Agreement"). MWG accepted PJM's proposal and signed the Second Agreement. *See* Attachment 5.

Illinois' Resource Adequacy Study, the North American Electric Reliability Corporation, and PJM have each independently concluded that PJM will face reliability and/or capacity shortfalls beginning in 2029 absent intervention. Without this Second Agreement, MWG would have deactivated the Powerton, Fisk, and Waukegan electric generating units no later than December 31, 2029, removing more than 1,800 MW of installed capacity from service[1], contributing to the projected shortfalls.

In accordance with 40 CFR §423.18(a), the Units remain in the category and qualify as units permanently ceasing combustion of coal by December 31, 2028.

[1] MWG complies with 35 IAC Part 217 Subpart V by emissions averaging across its operating fleet. Retirement of Powerton will cause retirement of peaking EGUs at Fisk Station and Waukegan Station.

Attachment 5
PJM Withdrawal Notice

July 2, 2026

VIA EMAIL

Michael Bryson
Senior Vice President, Operations
PJM Interconnection, LLC
2750 Monroe Boulevard
Audubon, PA 19403

RE: Withdrawal of Deactivation Notice of Powerton, Waukegan, and Fisk

Dear Mr. Bryson:

On June 30, 2026, pursuant to Part V, Section 113 of the PJM Open Access Transmission Tariff ("OATT"), Midwest Generation, LLC ("MWG") submitted a deactivation notification of Powerton Units 5 and 6, Fisk CTs 31-34, and Waukegan CTs 31 and 32, effective January 1, 2030. On July 2, 2026, PJM, pursuant to the authority provided to it under the Illinois Climate and Equitable Jobs Act, and based on other identified justification, requested continued operation of the Units until May 31, 2031. On July 2, 2026, MWG agreed to PJM's proposed plan to support system reliability in the PJM Region.

MWG hereby withdraws the previously submitted deactivation notice.

Sincerely,

Bradley Kranz
President
Midwest Generation, LLC

View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialogue box that appears. Note: If your browser does not support this function, select Print from the File menu to print the label.

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