

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 reference¹. 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:

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 5³ 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 results³ 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.

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 (I).

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 Plan¹⁵ 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.

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.

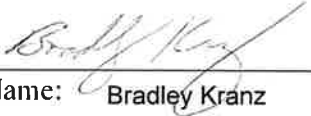
¹⁵ [Illinois Integrated Resource Plan](#)

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 service¹, 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.

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