



A subsidiary of Cleco Corporate Holdings LLC
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January 8, 2021

CERTIFIED MAIL- RETURN RECEIPT REQUESTED 7016 3010 0000 3215 1198

Louisiana Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Attn: Mr. Elliott Vega, Assistant Secretary

**RE: Notice of Planned Participation per 40 CFR 423.19(f)
Cleco Power LLC
Brame Energy Center – Rodemacher Unit 2
LPDES Permit No. LA0008036
AI No. 2922**

Dear Mr. Vega:

Cleco Power LLC (Cleco) herewith submits a notice of planned participation per 40 CFR 423.19(f) for the Brame Energy Center located in Lena, Louisiana. The Brame Energy Center is currently operating under LPDES Permit No. LA0008036 that was issued by the Louisiana Department of Environmental Quality (LDEQ) on September 3, 2014 and became effective on October 1, 2014. The purpose of this submittal is to notify the department of Cleco's intent to comply with 40 CFR 423 - Effluent Guidelines and Standards for Steam Electric Power Generating Point Source Category by ceasing coal fired operation at Rodemacher Unit 2 by no later than December 31, 2028.

Per 40 CFR 423.19(f)(2), the following information is being submitted in support of this notification:

- Identify the electric generating units intended to achieve the permanent cessation of coal combustion.
Brame Energy Center - Rodemacher Unit 2
- Include the expected date that the electric generating unit is projected to achieve permanent cessation of coal combustion.
No later than December 31, 2028

- Does this date represent a retirement or a fuel conversion?
Currently Undecided
- Has the retirement or fuel conversion been approved by a regulatory body?
No, regulatory approvals are requested in the year prior to retirement/conversion
- What the relevant regulatory body is.
Louisiana Public Service Commission (LPSC)
Midcontinent Independent System Operator, Inc (MISO)
- Include a copy of the most recent integrated resource plan for which the applicable state agency approved the retirement or repowering of the unit subject to the ELGs, certification of electric generating unit cessation under 40 CFR 257.103(b), or other documentation supporting that the electric generating unit will permanently cease the combustion of coal by December 31, 2028.

In November of 2020, Cleco submitted a demonstration under 257.103(f), which outlines the intent to retire or convert the unit by October 17, 2028. The URL to Cleco’s CCR website is below. The demonstration can be found in the drop down menu under the title “Rodemacher”, document name: A Holistic Approach to Closure – Part A Demonstration. In accordance with 40 CFR 257.106(i)(18), LDEQ was notified following the submittal of this demonstration. A copy of the notification has been attached to this submittal for the Water Permit Division’s reference.

<https://www.cleco.com/about/regulatory/ccr-rule-compliance>

- Include a timeline to achieve the permanent cessation of coal combustion.

Given that the date in which coal fired operation is ceased is seven years away, a detailed timeline has not been developed. However, a general timeline is provided below. The cessation of coal fired operation date below is earlier than the October 17, 2028 CCR deadline due to the time need to complete closure activities.

Activity	Working Days Needed	Approx. Completion Date
MISO Approval	180	February 2027
LPSC Approval	120	April 2027
Cessation of Coal Fired Operation	-	August/September 2027

In conclusion, Cleco’s Brame Energy Center – Rodemacher Unit 2 is seeking to qualify as an electric generating unit that will achieve permanent cessation of coal combustion by December 31, 2028, per 40 CFR 423.19(f). It is Cleco’s understanding that this notice of planned

participation provides adequate supporting information and satisfies the requirements of 40 CFR 423.19(f)(1) and 40 CFR 423.19(f)(2). If you have any questions or require additional information, please feel free to contact me at (318) 484-7739.

Sincerely,

A handwritten signature in blue ink, appearing to read "Samuel Wise". The signature is fluid and cursive, with the first name "Samuel" and the last name "Wise" clearly distinguishable.

Samuel Wise
Manager – Waste & Water Quality



Cleco Corporate Holdings LLC
2030 Donahue Ferry Rd
P. O. Box 5000
Pineville, LA 71361-5000
318 484-7718

December 2, 2020

Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
Post Office Box 4313
602 North 5th Street
Baton Rouge, Louisiana 70821-4313
Attention: Elliott Vega

Re: Brame Energy Center —Notification of Intent to Comply with the Site-Specific
Alternative to Initiation of Closure Due to Permanent Cessation of a Coal-Fired Boiler(s)
by a Date Certain at 40 C.F.R. 257.103(f)(2)

Dear Mr. Vega:

Pursuant to 40 C.F.R. § 257.106(i)(18), Cleco Power LLC (Cleco) is providing notification of its intent to comply with the site-specific alternative to initiation of closure due to permanent cessation of a coal-fired boiler(s) by a date certain for the Bottom Ash Pond at the Brame Energy Center. As EPA stated in the final rule promulgating these alternative closure requirements, “facilities that are converting their boilers to natural gas or a different fuel source (non-coal) are eligible for the provision.” 85 Fed. Reg. 53,516, 53,547 (Aug. 28, 2020).

In accordance with 40 C.F.R. § 257.103(f)(2), Cleco submitted a demonstration seeking to qualify for these alternative closure requirements to the United States Environmental Protection Agency (USEPA) on November 12, 2020. A revised demonstration was submitted to the United States Environmental Protection Agency (USEPA) on November 25, 2020. As required by 40 C.F.R. §§ 257.103(f)(2)(vii) and 257.105(i)(18), Cleco also placed the revised demonstration—along with a notification that it submitted the demonstration—in the facility’s operating record and on the facility’s public website.

Please contact me at 318 623-6436 or william.matthews@cleco.com if you have any questions regarding this submittal.

Sincerely,

/s/ Bill Matthews

Bill Matthews

Director, Environmental Policy & Planning
Cleco Support Services

CC: Yolunda Righteous
Vivian Johnson
Kyle Beall