

Cleco Power LLC



A subsidiary of Cleco Corporate Holdings LLC
2030 Donahue Ferry Road
P.O. Box 5000
Pineville, LA 71361-5000
www.cleco.com
Tel. 318-484-7400

July 31, 2024

CERTIFIED MAIL- RETURN RECEIPT REQUESTED 7016 3010 0000 3215 0122

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4313
Attn: Mr. Jerry Lang

Re: 2023-2024 Annual Progress Report per 40 CFR 423.19(g)
Cleco Power LLC, Brame Energy Center – Rodemacher Unit 2
LPDES Permit LA0008036
Lena, Louisiana
Agency Interest No. 2922

Dear Mr. Lang:

Per Louisiana Pollutant Discharge Elimination System (LPDES) Permit LA0008036, Cleco Power LLC (Cleco) is submitting one original and one copy of the annual progress report required 40 CFR 423.19(g). This progress report is representative of activities that have occurred between August 1, 2023, and July 31, 2024.

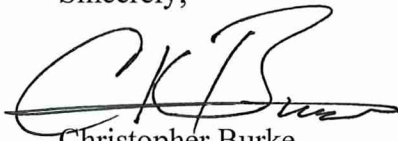
Cleco submitted a Notice of Planned Participation (NOPP) per 40 CFR 423.19(g) to comply with the Effluent Guidelines and Standards for Steam Electric Power Generating Point Source Category (ELG rule). As indicated by the NOPP, Cleco intends to comply with the ELG rule by ceasing coal-fired operation by no later than December 31, 2028. Compliance with the ELG retirement option is expected to be achieved on a parallel path with compliance with the CCR Part A Demonstration submitted to EPA. On November 25, 2020, Cleco submitted a demonstration to EPA requesting approval to close the Bottom Ash Pond under the alternative closure provisions of 40 CFR 257.103(f)(2). In the demonstration, Cleco proposed that Rodemacher Unit 2 will cease generating coal-fired electricity and close the Bottom Ash Pond by no later than October 17, 2028. This Part A Demonstration has been deemed complete by the EPA and is pending final approval. While the demonstration is still pending, Cleco is working towards compliance with the conditions proposed in the demonstration, ensuring compliance with the alternative closure provisions and the ELG rule.

As of July 31, Brame Energy Center's Rodemacher Unit 2 is still operating, and no regulatory filings have been made to the facility's reliability authority. However, Cleco intends to cease coal-fired operation of Rodemacher 2 in the third quarter of 2027, as outlined in the NOPP.

In 2023, Cleco completed construction of a CCR compliant landfill cell, which was designed to accept the material that was previously placed in both the facility's Fly Ash and Bottom Ash Ponds. Closure of the Fly Ash Pond was also completed in 2023 in accordance with the facility's approved closure plan. While the Fly Ash Pond is not part of the NOPP, Cleco believes that this information is valuable to show progress towards the ultimate closure of both ash ponds prior to the CCR and ELG deadlines. A similar closure strategy will be implemented to close the Bottom Ash Pond.

It is Cleco's understanding that the information above satisfies the requirements of 40 CFR 423.19(g)(3). If you have questions, please contact Sam Wise at (318) 484-7739.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Burke', with a horizontal line underneath.

Christopher Burke
VP – Generation Operations
Cleco Power LLC

cc: Dr. Amanda Vincent
Louisiana Department of Environmental Quality
Office of Environmental Services