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2030 Brandon Shores Road • Baltimore, MD 21226

December 20, 2025

Attention: Discharge Monitoring Reports
Water and Science Administration – Compliance Reports
Maryland Department of the Environment
1800 Washington Blvd., Suite 425
Baltimore, MD 21230-1708

**RE: RAVEN POWER FORT SMALLWOOD, LLC – TALEN ENERGY, LLC
STATE DISCHARGE PERMIT NO. 13-DP-0194A / NPDES PERMIT NO. MD0001503
SPECIAL CONDITION AD.4
NOTICE OF PLANNED PARTICIPATION – 2025 ANNUAL PROGRESS REPORT**

To Whom This May Concern:

Pursuant to Special Condition AD.4 of the above referenced permit & 40 CFR Part 423.19(g)(3), the following is to provide an annual summary of the progress towards completing the interim milestones included in the December 22, 2020 Notice of Planned Participation (NOPP) (in the 2028 permanent cessation of coal [PCCC] subcategory) submitted by Raven Power Fort Smallwood, LLC (Raven) for its Flue Gas Desulphurization (FGD) and Bottom Ash Transport Water (BATW) wastewaters.

As stated in the NOPP, the first interim milestone was to submit a major permit/Certificate of Public Convenience and Necessity (CPCN) application on September 1, 2021 for the fuel conversion project from coal to residual fuel oil (RFO) at Brandon Shores Units 1 and 2 and H.A. Wagner's (Wagner) Unit 3. Raven Power submitted the required applications, as described in NOPP. Raven also received approval to proceed with the fuel conversion projects from the Maryland Public Service Commission (PSC) (on January 12, 2022) and from the Maryland Department of the Environment (MDE) – Air and Radiation Administration (MDE-Air). MDE-Air issued a Permit to Construct for the Brandon Shores fuel conversion projects on June 29, 2022.

As per the 2024 NOPP submittal, Wagner Unit 3 permanently ceased coal combustion December 22, 2023, and as noted, will no longer submit future NOPP annual progress.

However, instead of converting from coal to RFO at Brandon Shores, Brandon Shores notified PJM Interconnection, LLC (PJM), the independent system operator (ISO), of its plans to fully deactivate its two coal-fired units (Units 1 and 2) by June 1, 2025 (Deactivation Notice). After submitting Brandon Shores' Deactivation Notice, PJM responded indicating that Units 1 and 2 were needed for electrical grid system reliability until new transmission could be built to relieve the electrical constraints in the Baltimore area that would result in the absence of the units' generating power. A reliability must run agreement was issued by PJM and approved by the Federal Energy Regulatory Commission (FERC) that requires Brandon Shores' Units 1 and 2 to continue running through May 31, 2029. Through this action, Brandon Shores will be discharging FGD and BATW wastewaters 1) beyond the 12/31/2028 PCCC deadline, but also 2) past the 12/31/2025 PCCC deadline Brandon Shores initially indicated in its NPDES permit. However, Talen believes this combination of reliability-related activities meets the criteria for a "Qualifying Event" as described in 40 CFR Part 423.18(a)(3), which allows for discharges past 2028.

More information on this can be found in the *Fort Smallwood NPDES ELG Qualifying Event Certification Statement* that was submitted to MDE and posted to the public ELG website on February 26, 2025.

If you have any questions regarding this annual progress report, please feel free to contact me at 410-787-5166 or email at joshua.sawyers@talenergy.com.

Regards,



Joshua Sawyers,
Environmental Manager