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December 8, 2025

Ms. Maria Bebenek
Clean Water Program
PA Department of Environmental Protection
909 Elmerton Avenue
Harrisburg, Pennsylvania 17110-8200

**RE: BRUNNER ISLAND, LLC / BRUNNER ISLAND SES – TALEN ENERGY, LLC
NPDES PERMIT NO. PA0008281
NOTICE OF PLANNED PARTICIPATION – 2025 ANNUAL PROGRESS REPORT**

Dear Ms. Bebenek,

Pursuant to 40 CFR 423.19 of the Supplemental Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Categories, the following is being submitted to provide an annual summary of the progress towards completing the interim milestones included in the Notice of Planned Participation (NOPP) (in the 2028 permanent cessation of coal [PCCC] subcategory) submitted by Brunner Island Steam Electric Station (Brunner) for its Flue Gas Desulphurization (FGD) and Bottom Ash Transport Water (BATW) wastewaters.

A Consent Decree between Talen Energy Corporation, Brunner Island, LLC, and Sierra Club, lodged in the United States District Court for the Middle District of Pennsylvania and entered on May 17, 2018, substantiated the supporting documentation required by the NOPP as certification to permanently cease coal combustion by December 31, 2028. The NOPP encompassed two interim milestones, (1) finish a fuel conversion project, which allows Brunner to operate on dual fuel capacity for both natural gas and coal which will allow us to (2) cease coal burning activities during the ozone season, while maintaining capacity on natural gas beginning May 1, 2023, until coal operations permanently cease on December 31, 2028. The first milestone has been completed, and the second milestone remains on target, as Brunner has successfully operated on gas alone through the CY2023, CY2024 and CY2025 Ozone Seasons.

If you have any questions regarding the contents of this report submittal, please feel free to contact Kate Locke (kathleen.locke@talenergy.com) or Tom Black (Thomas.Black@talenergy.com).

Regards,

A handwritten signature in black ink that reads "Thomas Black". The signature is written in a cursive, slightly stylized font.

Thomas Black
Plant Manager – Brunner Island SES