

Miami Fort Power Company LLC  
6555 Sierra Drive  
Irving, TX 75039

November 25, 2025

Re: Annual Progress Report (§ 257.103(f)(2)(x)) for the Miami Fort Power Plant

In accordance with 40 C.F.R. § 257.103(f)(2)(x), Miami Fort Power Company LLC (Miami Fort) submits this, “annual progress report documenting the continued lack of alternative capacity and the progress towards the closure of the CCR surface impoundment.”

#### Continued Lack of Alternative Capacity

As set forth in the retirement demonstration dated November 30, 2020, for the Miami Fort Pond System, no alternative capacity exists for the CCR and non-CCR waste streams that are being disposed in the Miami Fort Pond System. As EPA explained in the preamble to the proposed Part A revisions, “it would be illogical to require [] facilities [ceasing power generation] to construct new capacity to manage CCR and non-CCR wastestreams.”<sup>84</sup> Fed. Reg. 65,941, 65,956 (Dec. 2, 2019). EPA again reiterated in the preamble to the final revisions that “[i]n contrast to the provision under § 257.103(f)(1), the owner or operator does not need to develop alternative capacity because of the impending closure of the coal fired boiler.”<sup>85</sup> Fed. Reg. 53,516, 53,547 (Aug. 28, 2020). Circumstances have not changed at the Miami Fort Power Plant, and there are no existing options to dispose of CCR and non-CCR other than in the Miami Fort Pond System. Accordingly, there is a continued lack of alternative capacity at the Miami Fort Power Plant.

#### Progress Towards Closure

As set forth in the retirement demonstration dated November 30, 2020, for the Miami Fort Power Plant, construction of closure is expected to begin on August 17, 2027, with closure complete by October 17, 2028, as required by 40 C.F.R. 257.103(f)(2)(iv)(B). Circumstances have not changed with respect to completion of closure activities at Miami Fort. The company is aware of and continues to consider the reliability concerns identified by the North American Reliability Electric Corporation and some Independent System Operators.

Sincerely,



Cynthia Vodopivec  
Senior Vice President – Environmental, Health & Safety