



Department of Energy

Washington, DC 20585

June 25, 2026

Lisa D. Jones
Executive Director and State Historic Preservation Officer
468 South Perry Street
P.O. Box 300900
Montgomery, AL 36130

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Alabama Power Company, Plant Barry Unit 5 Coal to Gas Conversion Project, Mobile County, Alabama

Dear Lisa Jones,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has issued a Federal loan guarantee to Alabama Power Company (APC or Borrower) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to APC is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. APC has identified the Plant Barry Unit 5 Coal to Gas Conversion Project (the Project) located in Mobile County, Alabama, for potential inclusion in the loan guarantee.

The purpose of this letter is to formally initiate consultation with the Alabama State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents descriptions of the undertaking associated with DOE's proposed Federal financial assistance, the Area of Potential Effects (APE), and the efforts to identify historic properties, and seeks your concurrence with DOE's Finding of No Historic Properties Affected for this Project.

A map of the Project is included as Attachment 1, and an Alabama Historical Commission (AHC) Review and Consultation Form is included as Attachment 2.

Description of the Undertaking

DOE's action is the issuance of Federal financing to the Borrower for undertaking (the Project), which involves converting the existing Plant Barry Unit 5 coal-fired steam electric generating unit to natural gas by replacing the existing coal burners with new natural gas burners and associated equipment. The Project scope includes updates and improvements to existing facilities including a retrofit of the existing Unit 5 boiler and balance-of-plant

systems, and the installation of new equipment within the current boiler house and associated ductwork. The conversion requires the replacement of the existing coal burners—currently installed at six (6) boiler elevations with eight (8) burners per elevation—with new natural gas burners. The new burners will be installed at five (5) boiler elevations with eight (8) burners per elevation. Each burner will be equipped with double block and vent valve trains, gas spuds, burner nozzles, flame scanners, and associated safety control devices.

A new main natural gas supply piping system will be installed from the existing 20-inch Unit 5 gas header stub to the 40 new burners. The system will include vendor-supplied pressure and flow control equipment, natural gas flow metering equipment, and National Fire Protection Association (NFPA)-compliant venting. The ignition system will be upgraded to a Class I ignitors system, 8 new ignitor water wall panels, and a dedicated ignitor gas supply system. Air system upgrades include retrofitting windbox dampers, installing new air nozzles, rerouting primary air to secondary air ducts, and redesigning air heater baskets and seals to reduce pressure losses. Emissions control equipment includes installation of a new single-layer oxidation catalyst upstream of the Selective Catalytic Reduction (SCR) system. A replacement SCR catalyst layer is also included for optimization. Additional continuous emission monitoring system (CEMS) equipment will be installed.

Key construction activities include the replacement of coal burners with natural gas burners, installation of new gas supply and ignitor piping systems, improvements to air and flue gas ductwork, installation of an oxidation catalyst, and construction of a new climate-controlled Distributed Control System (DCS) room within the Unit 5 boiler house. Supporting structural steel, platforms, grating, and localized floor construction will be added as required for equipment removal and new skid installations.

All construction and upgrades/improvements will occur within previously disturbed industrial areas of the existing power plant site. No greenfield development is anticipated as part of the Project. No new off-site infrastructure, access roads, pipelines, or transmission corridors will be required for the Project. All supporting infrastructure updates are limited to the existing plant footprint and will be developed within previously disturbed areas of the Plant Barry site. These include temporary laydown areas within the site, internal access adjustments during outages, electrical raceway and cable modifications, integration with existing electrical substations, and expansion of IT and fiber networks to support the new DCS room and simulator upgrades. Ductwork modifications will be required to isolate the existing scrubber and exhaust flue gas directly to the dry stack.

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of

the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

The Project's APE includes the area where Project activities will occur within the existing Plant Barry facility, including within the Unit 5 building and an existing on-site laydown yard for equipment staging and storage. A map of the Project is included as Attachment 1.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following seven (7) federally recognized Tribes to see if they have an interest in the Project: Alabama-Coushatta Tribe of Texas; Alabama-Quassarte Tribal Town; Choctaw Nation of Oklahoma; Coushatta Tribe of Louisiana; Mississippi Band of Choctaw Indians; Muscogee (Creek) Nation; and Seminole Tribe of Florida.

By separate letter sent concurrently with this submission to the SHPO, DOE EDF has requested Tribal respondents to provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and to identify any additional Tribes that may share an interest in the Project area so DOE EDF can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is necessary or requested.

Archaeological and Historic Architectural Resources

The proposed Project activities include replacements, retrofits, and upgrades to existing facility components. The Project will utilize an existing developed area within the Plant Barry site as a laydown yard for equipment staging and storage (see Attachment 1). As no new ground disturbance is required for the Project, the Project does not have the potential to cause effects on archaeological resources; therefore, an archaeological survey is not warranted for this Section 106 review.

Furthermore, as the Project does not include any new permanent above-ground construction that would alter the exterior of the Plant Barry facility in a manner that could affect the character of the surrounding setting, the Project does not have the potential to cause visual and other non-physical effects on historic properties external to the Plant Barry facility; therefore, a historic architectural survey external to the Plant Barry facility is not warranted for this Section 106 review.

Lastly, the Plant Barry facility has not been evaluated for NRHP eligibility, and its potential eligibility status is unknown. As part of this Section 106 review, DOE EDF is not evaluating the Plant Barry facility or determining its eligibility for the NRHP because the scope of the undertaking does not have the potential to adversely affect this potential

historic property. While the undertaking could potentially alter the design, workmanship, or material fabric of specific facility components, it is DOE EDF's opinion that those components would not be considered historically significant individually or as contributing elements to the potential NRHP eligibility and/or the historic significance of Plant Barry overall were it to be formally evaluated for the NRHP. Therefore, DOE EDF recommends that the NRHP eligibility of the Plant Barry facility remain "undetermined", and DOE EDF finds that the undertaking would not affect the ability of Plant Barry to convey its potential historic significance.

Requesting your Concurrence and Next Steps

Based on DOE EDF's efforts to identify historic properties and conclusions drawn from this information, DOE EDF is issuing a Finding of No Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE requests the concurrence of the Alabama SHPO on the Finding of No Historic Properties Affected, as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter**.

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact me at 240-687-7266 or via email at EDF_Environmental@doe.gov.

Sincerely,

Molly R. Cobbs
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Project Map

Attachment 2. AHC Project Review and Consultation Form