



## Department of Energy

Washington, DC 20585

October 5, 2026

Barbara Frederick  
Environmental Review Division Manager  
Pennsylvania Historical and Museum Commission  
Pennsylvania State Historic Preservation Office

cc:

Megan Willison  
Planning Division, U.S. Army Corps of Engineers

**SUBJECT:** U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Homer City Generation Pipeline (HCPP) Project, Indiana County, Pennsylvania

Submitted electronically via PA-SHARE: **ER Project # 2025PR03524**

Dear Ms. Frederick,

Pursuant to its authority under Title XVII of the Energy Policy Act of 2005, as amended, which established a Federal loan guarantee program, the U.S. Department of Energy (DOE), Office of Energy Dominance Financing (EDF) is evaluating whether to provide a Federal loan guarantee to Homer City Generation, LLC (the Applicant) for the proposed HCPP Pipeline Project (the Project), in Indiana County, Pennsylvania. The Project is an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54 United States Code (U.S.C.) § 306108, and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800.

DOE EDF previously consulted with the Pennsylvania State Historic Preservation Office (SHPO) for the Applicant's Homer City Power Generation Project under ER # 2025PR02466, receiving two separate letters of concurrence with a finding of No Historic Properties Affected: one on March 6, 2026, for above-ground resources, and another on March 9, 2026, for archaeological resources. After the conclusion of that consultation, the Applicant expanded the scope of their application for a Federal loan guarantee to include the construction and operation of the HCPP Pipeline. Because this new pipeline component of the undertaking introduces potential to cause effects outside the previously reviewed area of potential effects (APE), DOE EDF is continuing Section 106 consultation to address the expanded scope of the undertaking.

Prior to DOE EDF's involvement in the HCPP Pipeline Project, the U.S. Army Corps of Engineers (USACE) previously conducted Section 106 consultation with your office for the HCPP Pipeline under ER Project # 2025PR03524 by letters dated February 19, 2026, and September 2, 2026, in which the USACE issued a finding of No Historic Properties Affected for the undertaking. The USACE consultation concluded with SHPO's responses dated March 19, 2026, and September 3, 2026, concurring with the finding of No Historic Properties Affected.

Homer City Generation, LLC's application for a Federal loan guarantee from DOE EDF for the HCPP Pipeline Project introduces an additional nexus of Federal involvement triggering Section 106 review of this undertaking. DOE EDF is responsible for documenting its compliance with Section 106 as part of the environmental review procedure for consideration of whether to provide a Federal loan guarantee for the Project. This correspondence serves to document DOE EDF's fulfillment of its responsibilities under Section 106.

The APE for the HCPP Pipeline Project was previously established by the USACE under PA-SHARE ER# 2025PR03524. DOE EDF's evaluation of whether to provide a Federal loan guarantee to the Applicant for the Project does not alter the scope of the undertaking, the APE, the efforts to identify historic properties, or the undertaking's potential effects on historic properties as established by the USACE consultation. DOE EDF has reviewed the cultural resource surveys and USACE consultation record for the undertaking and affirms that the efforts to identify historic properties are sufficient to substantiate the Finding of No Historic Properties Affected. In summary, the additional Federal involvement of DOE EDF (Federal financing) does not change the outcome of the previously completed consultation.

### **Conclusion and Next Steps**

With this letter, DOE EDF seeks to notify the USACE and SHPO of the additional DOE EDF involvement in the undertaking and to:

1. Document DOE EDF's agreement with the APE established by USACE, and that the efforts to identify historic properties are sufficient to substantiate the Finding of No Historic Properties Affected; and
2. Request USACE and SHPO's concurrence that the additional Federal involvement of DOE EDF (Federal financing) does not materially alter the undertaking, the APE, the scope of historic properties identification, or the undertaking's potential effects on historic properties as established by USACE and agreed to by SHPO, and no further action is necessary to fulfill DOE EDF's Section 106 responsibilities.

DOE EDF respectfully requests SHPO's comments and consensus on the above. We appreciate your time and look forward to hearing from you.

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will consult with USACE to 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).

Sincerely,

**WHITNEY  
DONOGHUE**

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