



Department of Energy
Washington, DC 20585

July 28, 2026

Ashley McVicar, P.E.
Water Compliance Manager
Environmental Affairs
Alabama Power Company
600 18th Street North
Birmingham, AL 35291-0040

Subject: U.S. Department of Energy, Office of Energy Dominance Financing,
Completion of Environmental Review for the Plant Barry Unit 5 Coal to
Natural Gas Conversion, Mobile County, Alabama

Dear Ashley McVicar:

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has issued a Federal loan guarantee to Alabama Power Company (APC) 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 Natural Gas Conversion project (Project) for potential inclusion in the loan guarantee.

Plant Barry is a seven-unit electric generating facility, consisting of three natural gas-fired units (Units 1, 2, and 4), one coal-fired unit (Unit 5), two 2-on-1 natural gas combined cycle units (Units 6A and 6B, 7A and 7B) and one 1-on-1 natural gas combined cycle unit (Unit 8). Plant Barry is located along the west bank of the Mobile River at 15300 Highway 43, Bucks, Alabama, approximately 20 miles north of Mobile. APC owns the land occupied by Plant Barry and the facility does not occupy any federal lands.

The project consists of converting Unit 5 from coal to natural gas leveraging existing infrastructure. Construction activities will include replacing the existing coal burners with forty (40) natural gas burners, installing a new natural gas supply piping and ignition system, adding an oxidation catalyst, and constructing a new climate-controlled Distributed Control System (DCS) room within the existing boiler house. 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. Supporting structural steel, platforms, grating, and localized floor construction will be added as required for equipment

removal and new skid installations.

All construction 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 a temporary laydown area within the site, internal access adjustments during outages, electrical raceway and cable modifications, integration with existing electrical substations, and expansion of information technology (IT) and fiber networks to support the new DCS room and simulator upgrades. The laydown area is in an existing gravel parking lot just east of the existing building that houses Unit 5. Ductwork modifications will be required to isolate the existing scrubber and exhaust flue gas directly to the dry stack.

The project is expected to begin construction on October 1, 2026, with an anticipated completion date in summer 2028.

EDF, in coordination with the APC, has identified environmental statutes and Executive Orders applicable to the proposed Federal financial support for the Project include, but are not limited to:

1. Section 7 of the Endangered Species Act (16 USC 1536)
2. Section 106 of the National Historic Preservation Act (54 USC 306108)
 - a. Executive Order 13175, Consultation and Coordination with Indian Tribal Governments

EDF completed the environmental reviews and consultations associated with the Project, as summarized below.

Section 7, Endangered Species Act

In accordance with Section 7(a)(2) of the Endangered Species Act (ESA), EDF reviewed its proposed action, Federal financial support for the Project, to ensure that such action would not be likely to jeopardize the continued existence of federally listed threatened or endangered species, or result in the destruction or adverse modification of designated critical habitat. The Project site is a heavily industrialized power generation site with no suitable habitat for the species identified in the July 8, 2026, Official Species List. Additionally, there is no designated critical habitat present on the site. As such, EDF determined that its action would have *no effect* on federally listed species or designated critical habitat.

Section 106, National Historic Preservation Act

In accordance with Section 106 of the National Historic Preservation Act (NHPA), on June 25, 2026, DOE EDF initiated consultation with the Alabama State Historic Preservation Office (SHPO) and 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. No Tribes responded.

DOE's consultation package indicated a Finding of No Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1).

On July 14, 2026, the Alabama SHPO provided a letter of concurrence with DOE's Finding of No Adverse Effect to Historic Properties. The Alabama SHPO's concurrence letter stipulates:

If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact [SHPO's] office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (Code of Alabama 1975, §13A-7-23.I, as amended Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

No objections were received from these parties within 30 days of receipt of DOE's Finding; therefore, in accordance with 36 CFR § 800.4(d)(1)(i), DOE EDF's responsibilities under section 106 are fulfilled.

Conclusion

EDF notes that APC is responsible for obtaining permits, approvals, and/or authorizations required for the construction and/or operation of the Project.

With this letter, EDF confirms that it has completed the environmental reviews and consultations required by the applicable and relevant environmental statutes and EOs associated with its proposed Federal financial support.

Respectfully,

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

cc: Denis O'Meara, EDF Utilities Vertical Lead
Giulio Areinamo-Duque, EDF Portfolio Management Division
Todd Stribley, Director, EDF Environmental Programs