Department of Energy
Washington, DC 20585

November 6, 2026

Kira Dunn, Vice President, Public and Private Funding
Homer City Redevelopment, LLC
430 Innovation Drive
Blairsville, PA 15717

Subject: U.S. Department of Energy, Office of Energy Dominance Financing, Completion of Environmental Review for a Proposed Federal Loan Guarantee to Knighthead Capital Management (Sponsor) / Homer City Generation, L.P. (Applicant) for the Homer City Redevelopment Project, as Expanded to Include the Homer City Generation Pipeline, Indiana County, Pennsylvania

Dear Ms. Dunn: Homer City Redevelopment, LLC

As provided in letters to you dated March 4 and April 30, 2026, the U.S. Department of Energy (DOE), Office of Energy Dominance Financing (EDF) may provide Federal financial assistance (i.e., loan guarantee) under Title XVII of the Energy Policy Act of 2005 ("Title XVII"), Public Law 109-58, title XVII (2005), as amended; 42 U.S.C. 16511 et seq.

DOE is considering whether to issue Federal financial assistance to Homer City Generation, L.P. pursuant to its authority. In its application for Federal financial assistance, Homer City Generation, L.P. has identified the Homer City Redevelopment Project (Project), located near Homer City, in Blacklick and Center Townships, Indiana County, Pennsylvania.

The Project includes redevelopment of a decommissioned coal-fired power plant and surrounding land into a 4.4-gigawatt (GW) combined cycle gas turbine (CCGT) generation facility. The Project will be located on an approximately 558-acre site within a 3,200-acre property that previously contained the Homer City Generating Station, a 2-GW coal-fired power plant operational from 1969 until its permanent decommissioning in 2023. Demolition of coal-era assets commenced in September 2024 and is now complete. The Project includes environmental remediation; installation of seven GE 7HA.02 turbines, each with associated balance-of-plant equipment and materials; and a substation. Additional Project components include a new water treatment facility and modernization of the existing water intake structure. Site redevelopment will incorporate parking lots and equipment laydown and staging areas, as well as temporary access roads, offices, warehouses, concrete batch plants, temporary utilities, and other construction-support facilities. Transmission line infrastructure is already established within the Project area.

EDF's April 30, 2026, environmental review completion letter addressed the generating facility as then proposed and expressly excluded any natural gas lateral pipelines from the requested Federal financial assistance. Following completion of that review, the Applicant notified EDF of a change in the scope of the financing request to include the construction and operation of the Homer City

Generation Pipeline (HCPP Pipeline). Because this component had not been included in the prior environmental review, EDF reopened and supplemented its environmental review and consultations to address the HCPP Pipeline. Future hyperscale data centers and associated infrastructure remain outside the scope of EDF's proposed Federal financial assistance described in this letter.

The HCPP Pipeline consists of an approximately 6-mile-long, 30-inch-diameter natural gas pipeline extending from a proposed metering-and-regulation (M&R) and interconnection facility in Burrell Township to the redeveloped Homer City Generating Station in Center Township, Indiana County. Associated facilities include an approximately 150-foot-by-200-foot M&R facility, workspaces contiguous with a 100-foot-wide right-of-way, approximately 0.6 mile of temporary access roads, 0.7 mile of existing access roads, and 0.8 mile of proposed permanent access roads. The pipeline project area encompasses approximately 106.7 acres.

EDF conducted environmental reviews and consultations under the applicable and relevant environmental statutes and Executive Orders (EOs) associated with its proposed Federal financial support for the expanded Project: (1) Section 7 of the Endangered Species Act (16 U.S.C. 1536); (2) Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and EO 13175, Consultation and Coordination With Indian Tribal Governments; and (3) the Farmland Protection Policy Act (7 U.S.C. 4201-4209). EDF's reviews and consultations for the original generating-facility scope remain documented in its April 30, 2026, completion letter, and the summaries below are specific to the HCPP Pipeline.

Applicable and Relevant Environmental Reviews

Section 7, Endangered Species Act

Following the addition of the HCPP Pipeline to the proposed financing scope, EDF consolidated its ESA Section 7 review of the generating facility and pipeline under the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) Project No. 2026-0102281 (PNDI Nos. 846435 and 823013). The pipeline was previously reviewed under IPaC Project No. 2025-0121413 with USACE as the lead Federal agency. Summer 2025 surveys within the pipeline action area indicated the probable absence of Indiana bats (*Myotis sodalis*), northern long-eared bats (*Myotis septentrionalis*), and tricolored bats (*Perimyotis subflavus*); USFWS confirmed the validity of those results on December 10, 2025. Under the consolidated Northeast Determination Key, USFWS issued concurrence on July 6, 2026, with EDF's May Affect, Not Likely to Adversely Affect (NLAA) determination for the endangered Indiana bat.

The consolidated Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key initially returned May Affect findings for both species. EDF subsequently determined that the expanded Project was NLAA for the endangered northern long-eared bat and proposed endangered tricolored bat, based on the validated bat surveys, no direct impacts to hibernacula, and the Applicant's commitment to restrict tree clearing to October 1 through March 31. On July 9, 2026, EDF requested concurrence under ESA Section 7(a)(2) for the northern long-eared bat and informal conference concurrence under Section 7(a)(4) for the tricolored bat. By letter dated July 31, 2026, USFWS concurred with both NLAA determinations, completing the supplemental informal

consultation and conference coordination for the expanded Project. These determinations remain contingent on the stated avoidance measures. If the tricolored bat becomes listed while Project construction or effects continue, or if new information or Project modifications alter the effects analysis, EDF will reassess the determination and undertake further consultation as required.

EDF's previous ESA Section 7 review and consultation for the generating facility are documented in its April 30, 2026, completion letter.

Section 106, National Historic Preservation Act, and EO 13175

As documented in EDF's April 30, 2026, completion letter, EDF previously completed Section 106 consultation for the generating-facility portion of the Project. For the HCPP Pipeline, EDF reviewed the cultural resources survey and the U.S. Army Corps of Engineers (USACE) consultation record under PA-SHARE ER Project No. 2025PR03524, including SHPO responses dated March 19 and September 3, 2026. The archaeological survey evaluated the pipeline limits of disturbance, approximately 106.7 acres, through pedestrian investigations and 298 shovel test pits. No archaeological historic properties were identified within the pipeline area of potential effects (APE). The National Register of Historic Places-eligible Doty Gillis Farm (1998RE589) partially overlaps the corridor, but pipeline construction would not alter its character-defining architectural features or introduce permanent changes to its contributing setting.

By letter dated October 5, 2026, EDF notified the Pennsylvania State Historic Preservation Office (SHPO) and USACE of the added Federal financing nexus and requested concurrence with EDF's Finding of No Historic Properties Affected for the HCPP Pipeline. On October 8, 2026, the SHPO responded under PA-SHARE ER Project No. 2025PR03524.009, determining that the pipeline would have No Effect on the Doty Gillis Farm and that no archaeological historic properties are present within the APE. Based on that response and the preceding consultation record, EDF's Section 106 consultation with SHPO for the HCPP Pipeline concluded on October 8, 2026. Any subsequent scope changes or newly identified historic property concerns would require consultation to be revisited as appropriate.

Consistent with Section 106 and EO 13175, EDF initiated pipeline-specific Tribal consultation by letters dated October 5, 2026, inviting the Delaware Nation, Oklahoma; Delaware Tribe of Indians; Seneca-Cayuga Nation; and Shawnee Tribe to identify historic properties of religious or cultural significance and provide comments within 30 days of receipt. The invitations included the cultural resources report and EDF's Finding of No Historic Properties Affected. Following expiration of the 30-day consultation period, no comments were received from the invited Tribes. EDF considered the consultation record and concluded pipeline-specific Tribal consultation on November 5, 2026.

In the event of post-review unanticipated discoveries of cultural resources and/or human remains during construction, EDF will coordinate with USACE regarding appropriate actions and notifications to the SHPO, interested Tribes, and the Advisory Council on Historic Preservation, consistent with the process described in EDF's October 5, 2026, consultation correspondence and 36 CFR 800.13(b)(3).

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Farmland Protection Policy Act

In accordance with the Farmland Protection Policy Act (FPPA), EDF coordinated with the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS), regarding the HCPP Pipeline (identified in the NRCS records as the Homer City Generation, L.P. TETCO Line). The pipeline was evaluated using Form NRCS-CPA-106, Farmland Conversion Impact Rating for Corridor Type Projects, submitted on June 9, 2026. By letter dated June 30, 2026, NRCS assigned the farmland a relative value of 70 points. The completed corridor assessment records 38 points, resulting in a combined score of 108 points, below the 160-point threshold; accordingly, no further alternatives analysis or action is required under the FPPA. NRCS also found no potential impact to NRCS easements or dams. EDF's FPPA consultation for the original generating facility is documented separately in its April 30, 2026, completion letter.

Conclusion

EDF notes that Homer City Redevelopment, LLC 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 Executive Orders (EOs) associated with its proposed Federal financial support.

EDF will continue with environmental due diligence reviews, as needed, to support the development of the loan guarantee agreement.

Respectfully,

WHITNEY DONOGHUE
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Whitney Donoghue
Environmental Project Manager
Office of Energy Dominance Financing

cc: Alicia Williamson, Acting Director, EDF Environmental Programs
Josh Moraczewski, EDF Vertical Lead
Tom Hucker, EDF Deal Lead

Attachments: Letter Dated April 30, 2026 from EDF to Homer City Redevelopment, LLC