

June 22, 2023

Martha Clark Mettler  
Assistant Commissioner, Office of Water Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204

**RE: Northern Indiana Public Service Company  
R. M. Schahfer Generating Station  
NPDES Permit No. IN0053201  
Notice of Planned Participation under 40 CFR 423**

Dear Ms. Clark Mettler:

This letter serves as Notice of Planned Participation under 40 CFR 423 – Steam Electric Power Generating Point Source Category. Under the Reporting and Recordkeeping Requirements of 40 CFR 423.19(f), Northern Indiana Public Service Company, LLC (NIPSCO) is hereby notifying the permitting authority that NIPSCO plans to achieve permanent cessation of coal combustion from Units 17 and 18 at its R. M. Schahfer Generating Station by December 31, 2028. This notice includes the following information, in accordance with 40 CFR 423.19(f)(2):

**Electric generating units intended to achieve the permanent cessation of coal combustion:**

*RESPONSE:* Units 17 and 18 at NIPSCO's R. M. Schahfer Generating Station.

**Expected date that each electric generating unit is projected to achieve permanent cessation of coal combustion:**

*RESPONSE:* Units 17 and 18 are expected to cease coal combustion by December 31, 2025.

**Whether the date above represents a retirement or a fuel conversion:**

*RESPONSE:* Units 17 and 18 are expected to retire by December 31, 2025.

**Whether each retirement or fuel conversion has been approved by a regulatory body:**

*RESPONSE:* On January 31, 2023, NIPSCO filed an Attachment Y Suspension Notice with the Midcontinent Independent System Operator (MISO) indicating retirement of Units 17 and 18 at R. M. Schahfer Generating Station by December 31, 2025. On February 3, 2023, MISO approved the Attachment Y Suspension Notice. This documentation is enclosed with this letter.

**What the relevant regulatory body is:**

*RESPONSE:* Midcontinent Independent System Operator (MISO).

**Include a copy of the most recent integrated resource plan for which the applicable state agency approved the retirement or repowering of the unit subject to the ELGs:**

*RESPONSE:* In Indiana, utilities are required to submit Integrated Resource Plans (IRPs) to the Indiana Utility Regulatory Commission (IURC) every 3 years. While IRPs are submitted to the IURC as part of a legislative process, they are not regulatory filings where formal "approval" is granted. NIPSCO's 2021 IRP documents the full cessation of coal combustion at Units 17 and 18 by a previously announced retirement date of December 31, 2023. However, due to delays in development of solar projects, the retirements are now planned by December 31, 2025.

Please see NIPSCO's 2021 IRP here:

[https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/irp/2021-nipsco-integrated-resource-plan.pdf?sfvrsn=f6ae0251\\_6](https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/irp/2021-nipsco-integrated-resource-plan.pdf?sfvrsn=f6ae0251_6)

**Certification of electric generating unit (EGU) cessation under 40 CFR 257.103(b) or other documentation supporting that the EGU will permanently cease the combustion of coal by December 31, 2028:**

*RESPONSE:* Please see the enclosed Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-Fired Boilers by a Date Certain Addendum 2 cover letter. Please also see the associated Addendum 2 report, filed with the U.S. Environmental Protection Agency pursuant to §257.103(f)(2) here:

[https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/ccr/r.m.-schahfer/r.m.-schahfer-generating-station-groundwater-monitoring-and-corrective-action/rm-schahfer-generating-station-wda-part-a-addendum-2-summer-2022.pdf?sfvrsn=d2e31151\\_3](https://www.nipsco.com/docs/librariesprovider11/rates-and-tariffs/ccr/r.m.-schahfer/r.m.-schahfer-generating-station-groundwater-monitoring-and-corrective-action/rm-schahfer-generating-station-wda-part-a-addendum-2-summer-2022.pdf?sfvrsn=d2e31151_3)

**Timeline to achieve the permanent cessation of coal combustion (include interim milestones and the projected dates of completion):**

*RESPONSE:* January 31, 2023 – Attachment Y Suspension Notice Submitted to MISO  
February 3, 2023 – Attachment Y Suspension Notice Approved by MISO  
June 22, 2023 – Submittal of Notice of Planned Participation under 40 CFR 423  
December 31, 2025 – Schahfer Units 17 and 18 Retired

If you have any questions or require additional information, please contact me at (219) 741-6742 or via email at [sholcomb@nisource.com](mailto:sholcomb@nisource.com).

Sincerely,



Stephen Holcomb  
Director, Environmental Policy and Sustainability

cc: U.S. Environmental Protection Agency Region 5

Enclosures:

Attachment Y Suspension Notice

MISO's Approval of Attachment Y Suspension Notice

R. M. Schahfer Generating Station Demonstration Addendum Cover Letter Summer 2022



**Andrew Witmeier**  
Director, Resource Utilization  
317-249-5585  
awitmeier@misoenergy.org

**VIA TWO-DAY-AIR DELIVERY**

February 3, 2023

Ronald E. Talbot  
Sr. VP Electric Operations  
NIPSCO  
801 E. 86<sup>th</sup> Avenue  
Merrillville, IN 46410

**Subject: Approval of Schahfer Units 17 and 18 Attachment Y Suspension Notice**

Dear Mr. Talbot:

On February 1, 2023, Northern Indiana Public Service Company LLC submitted an amended Attachment Y Notice to MISO to move the suspension of Schahfer Units 17 and 18 from May 31, 2023 to December 31, 2025. After being reviewed for power system reliability impacts as provided for under Section 38.2.7 of MISO's Open Access Transmission, Energy, and Operating Reserve Markets Tariff ("Tariff"), the suspension of Schahfer Units 17 and 18 would not result in violations of applicable reliability criteria. Therefore, Schahfer Units 17 and 18 may suspend without the need for the generators to be designated as System Support Resource ("SSR") units as defined in the Tariff.

This letter acknowledges that Northern Indiana Public Service Company LLC will suspend Schahfer Units 17 and 18, effective December 31, 2025. MISO will continue to preserve the confidentiality of the Attachment Y Notice.

Please do not hesitate to contact me if you have any questions regarding this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "AWitmeier", written over a light blue horizontal line.

Andrew Witmeier  
Director, Resource Utilization

Extremely Urgent

P: RED S: RED I: 118

NIPSO  
801 E 86TH AVE

MERRILLVILLE IN 46410



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| SHIP TO:<br>RONALD E. TALBOT<br>8004647726<br>NIPSO<br>801 E. 86TH AVE<br>MERRILLVILLE IN 46410 |                 |             |        |
|                                                                                                 | IN 463 5-01<br> |             |        |
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| Reference No. 1: 161                                                                            |                 |             |        |
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010195101 2/22 RRD Ur



January 31, 2023

Andrew Witmeier  
Director Resource Utilization  
Midcontinent Independent System Operator, Inc.  
720 City Center Drive  
Carmel, IN 46032

Dear Mr. Witmeier,

Pursuant to the discussions Northern Indiana Public Service Company LLC ("NIPSCO") had with MISO about moving suspension dates for Schahfer Units 17 and 18, please find enclosed new Attachment Y Notices for the suspension of Schahfer Units 17 and 18.

As shown on the Attachment Y Notices, NIPSCO is requesting a suspension date of December 31, 2025, instead of the currently approved date of May 31, 2023.

The following two individuals are the primary points of contact for NIPSCO:

Andrew S. Campbell  
Director Portfolio Planning & Origination  
NIPSCO  
801 E. 86<sup>th</sup> Avenue  
Merrillville, IN 46410  
219.895.0771  
[andrewcampbell@nisource.com](mailto:andrewcampbell@nisource.com)

M. Bryan Little  
Assistant General Counsel  
NiSource Corporate Services  
150 West Market Street  
Suite 600  
Indianapolis, IN 46204  
317.684.4903  
[blittle@nisource.com](mailto:blittle@nisource.com)

Please let us know if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Bryan Little".

M. Bryan Little  
Assistant General Counsel

## ATTACHMENT Y

### Notification of Generation Resource/SCU/Pseudo-tied Out Generator

#### Change of Status,

#### Including Notification of Rescission

This is a notification of change of status of a Generation Resource, Synchronous Condenser Unit ("SCU"), or Pseudo-tied out Generator in accordance with Section 38.2.7.a of the Tariff. An electronic copy of the completed form will be accepted by the Transmission Provider, however, a form will not be considered complete until the original form containing an original signature, including all attachments, is received by the Transmission Provider at the following address: MISO, Attention: Director of Transmission Planning; 720 City Center Drive, Carmel, IN 46032.

The Transmission Provider may request additional information as reasonably necessary to support operations under the Tariff.

Owner of the Generation Resource, SCU or Pseudo-tied out Generator:

Northern Indiana Public Service Company LLC (NIPSCO)

Name of Market Participant: NIPSCO

Owner's state of organization or incorporation Indiana

Generation Resource/SCU/Pseudo-tied Out Generator [plant and unit number(s)] Schahfer Unit 17

Source/Identification of Generation Interconnection Service [name of agreement, parties, date, date filed and docket number, and any other information to identify an agreement] The unit was interconnected to NIPSCO's transmission system prior to MISO

Effective On: July 16, 2018

Location: 2723 E 1500 N Wheatfield, IN 46392

| Unit Name        | CPNode (if applicable) | Nameplate Capacity(MW) | Change in Capacity(MW) |
|------------------|------------------------|------------------------|------------------------|
| Schahfer Unit 17 | 7NIPS.SCHAHP18         | 423.5                  | Retire All             |
|                  |                        |                        |                        |
|                  |                        |                        |                        |
|                  |                        |                        |                        |

Owner understands and agrees that this notification is provided in accordance with Section 38.2.7 of the Transmission Provider's Tariff and will not be made public by the Transmission Provider except as provided for under Section 38.2.7 of the Tariff.

The undersigned certifies that he or she is an officer of the owner of the Generation Resource/SCU/Pseudo-tied out Generator, that he or she is authorized to execute and submit this notification, and that the statements contained herein are true and correct.

*Russell L. Galt*

Signature

Name: Ronald E. Talbot

## Contact Information

Title: SVP Electric Operations

Email: [rtalbot@nsource.com](mailto:rtalbot@nsource.com)

Date: 1/20/23

Phone: 219.647.5735

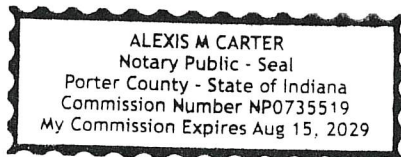
STATE OF Indiana

COUNTY OF Lake

Before me, the undersigned authority, this day appeared Ronald E. Talbot, known by me to be the person whose name is subscribed to the foregoing instrument, who, after first being sworn by me deposed and said:

"I am an officer of NIPSCO, I am authorized to execute and submit the foregoing notification on behalf of NIPSCO, and the statements contained in such application are true and correct."

SWORN TO AND SUBSCRIBED TO BEFORE ME, the undersigned authority on this the 31 day of January, 2023



Alexis M Carter

Notary Public, State of INDIANA

My Commission expires AUG 15, 2029

**ATTACHMENT Y**

**Notification of Generation Resource/SCU/Pseudo-tied Out Generator**

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**Including Notification of Rescission**

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Owner of the Generation Resource, SCU or Pseudo-tied out Generator:

Northern Indiana Public Service Company LLC (NIPSCO)

Name of Market Participant: NIPSCO

Owner’s state of organization or incorporation Indiana

Generation Resource/SCU/Pseudo-tied Out Generator [plant and unit number(s)] Schahfer Unit 18

Source/Identification of Generation Interconnection Service [name of agreement, parties, date, date filed and docket number, and any other information to identify an agreement] The unit was interconnected to NIPSCO's transmission system prior to MISO

Effective On: July 16, 2018

Location: 2723 E 1500 N Wheatfield, IN 46392

| Unit Name        | CPNode (if applicable) | Nameplate Capacity(MW) | Change in Capacity(MW) |
|------------------|------------------------|------------------------|------------------------|
| Schahfer Unit 18 | NIPS.SCHAFP18          | 423.5                  | Retire All             |
|                  |                        |                        |                        |
|                  |                        |                        |                        |
|                  |                        |                        |                        |

The undersigned certifies that he or she is an officer of the owner of the Generation Resource/SCU/Pseudo-tied out Generator, that he or she is authorized to execute and submit this notification, and that the statements contained herein are true and correct.

  
Signature

Name: Ronald E. Talbot Contact Information

Title: SVP Electric Operations Email: rtalbot@nisource.com

Date: 1/20/23 Phone: 219.647.5735

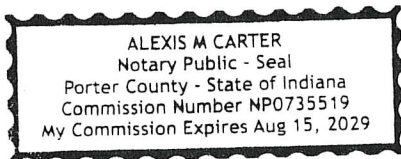
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Alexis M Carter

Notary Public, State of INDIANA

My Commission expires Aug 15, 2029



August 16, 2022

Submitted via email

Mr. Michael Regan, Administrator US EPA  
1200 Pennsylvania Avenue, N.W.  
Mail Code 5304-P  
Washington, D.C. 20460

Re: Northern Indiana Public Service Company LLC  
RM Schahfer Generating Station, Wheatfield, IN  
Demonstration – Addendum 2, Pursuant to 40 CFR Part 257.103(f)(2)

Dear Administrator Regan:

Northern Indiana Public Service Company LLC (NIPSCO LLC) is providing the enclosed *Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-Fired Boilers by a Date Certain* Addendum 2 (Demonstration Addendum 2) for approval by the United States Environmental Protection Agency (US EPA). Approval of NIPSCO LLC's 257.103(f)(2) Demonstration by the US EPA will allow NIPSCO LLC to continue use of the Waste Disposal Area ash pond (WDA) in operation at the RM Schahfer Generating Station located in Wheatfield, IN (RMSGs, Site), after April 11, 2022. This approximately 80-acre pond will complete closure no later than October 17, 2028, as provided in the enclosed Demonstration Addendum #2.

This Demonstration Addendum 2, provides a new date of permanent cessation of coal-fired boilers at the RMSGs and NIPSCO's continued commitment to cease operation and complete closure the WDA no later than October 17, 2028, as stipulated in 257.103(f)(2)(iv)(B). Furthermore, to meet the requirements of 40 CFR § 257.103(f)(2), Demonstration Addendum 2 supplies information updated since November 2020 (i.e., the date Demonstration Addendum 1 was prepared) with respect to groundwater monitoring and corrective action activities at RMSGs.

As explained and justified herein, cessation of coal-fired generation at RMSGs will now be December 31, 2025, providing nearly three years to a) complete boiler shutdown processes, some of which are expected to generate significant volumes of CCR and non-CCR waste streams, b) reduce and/or eliminate other ongoing influent streams, c) optimize the closure plan and gain regulatory agency approval for the WDA closure approach, and d) complete closure construction. Following cease receipt

of WDA waste streams (Q2 2026), NIPSCO estimates a timeframe of approximately two and a half years to achieve final closure of the WDA including the professional engineer's certification, thereby achieving final closure by September 17, 2028, and meeting the 40 CFR § 257.103(f)(2) deadline of October 17, 2028.

This Demonstration Addendum 2 in combination with Demonstration (Golder, October 2020) and Demonstration Addendum 1 (Golder, November 2020) meet the requirements of 40 CFR § 257.103(f)(2).

Following US EPA guidance, the enclosed Demonstration Addendum 2 was submitted via email to Richard Huggins, Frank Behan, Kirsten Hillyer and Lydia Anderson. I may be contacted at (219) 680-8628 or [mturman@nisource.com](mailto:mturman@nisource.com) with questions or comments.

Sincerely,

*Maureen Turman*

Maureen Turman  
NiSource Director Environmental Policy and Sustainability

Enclosure

CC: Richard Huggins, US EPA  
Frank Behan, US EPA  
Kirsten Hillyer, US EPA  
Lydia Anderson, USEPA