

**Brandon F. Marzo**

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**TRADE SECRET**

April 22, 2022

Ms. Sallie Tanner  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, GA 30334-5701

**RE: Georgia Power Company's 2022 IRP, Docket 44160.**

Dear Ms. Tanner:

On January 31, 2022, Georgia Power Company ("Company") filed its 2022 Integrated Resource Plan ("IRP") with the Georgia Public Service Commission ("Commission"). Pursuant to Commission Rule 515-3-4-.04(1)(c), the Company filed its Environmental Compliance Strategy ("ECS") as part of the 2022 IRP. As part of the ECS the Company includes a detailed overview of the applicable current and proposed environmental regulations, existing environmental law, potential legislation, and a comprehensive strategy for compliance. In the ECS accompanying the 2022 IRP, the Company informed the Commission that the proposed decertification of Plant Wansley Units 1 and 2 presented a unique opportunity for the Company to consider an additional closure option for the Plant Wansley Ash Pond. Specifically, as described in the Company's Direct Testimony of Dr. Mark Berry and Mr. Aaron Mitchell:

The Company's request to retire Plant Wansley Units 1 and 2 provides an opportunity to modify the current ash pond closure plans at the site and move from a closure in place to a closure by removal strategy for the Wansley ash pond. The continued operation of the coal-fired units at Plant Wansley requires the use of the on-site permitted CCR landfill to support the plant's environmental controls and handling of ash and gypsum byproducts. With the retirement of Units 1 and 2, this on-site landfill would be available for use in conjunction with the ash pond closure. (Tr. 25)

In the ECS the Company committed to provide the Commission additional information regarding the evaluation of this option once additional information was available. (*See* Exhibit GPC-1, ECS p.79). Therefore, the Company has enclosed with this letter an update to the ECS providing the additional information on the Plant Wansley ash pond closure strategy. The closure by removal strategy for Plant Wansley Units 1 and 2 provided in this update to the ECS is predicated on

approval of the decertification of Plant Wansley Units 1 and 2 as discussed by the Company in its ECS filing and direct testimony in this case. The table below identifies the applicable sections of the ECS and page numbers where this additional information specific to the Wansley closure has been incorporated into the Company's strategy.

Section	Page Reference	Revision
1.2 Summary of the 2022 ECS	3	CCR bullet revised to include Plant Wansley closure by removal strategy
	4	Strategy Schedule figure updated with new closure dates and moved landfill from "active" section.
1.3 Highlights of the 2022 ECS	6	CCR strategy bullet updated
	8	Plant closure table updated
	9	Permitting discussion updated
	9	Cost summary updated
4.3.2 Ash Pond Closure and Landfill Compliance Strategy	75	Updated issued permits to include final permit received for Plant Bowen closure in place
	76	CCR Strategy updated to reflect Plant Wansley closure by removal strategy including a discussion of the strategy assessment results
	82-83	Table 4.3-1 CCR Strategy updated for Wansley AP and Landfill
4.4 Strategy and Schedule	88	Figure 4.4-1 2021 Environmental Compliance Strategy Schedule -- updated with new closure dates and moved Wansley landfill from "active" section.
4.5 Financial Summary	88	Footnote added to clarify timing and scope of 10-k capital values provided
4.5.1 CCR Asset Retirement Obligations	89	-Updated to reflect April 2022 Selected Supporting Information -Revised to include summary of cost changes related to Plant Wansley closure by removal strategy revision

The Company has also updated the applicable sections of the Selected Supporting Information section of Technical Appendix Volume 1. The updated CCR ARO table provides cost estimates for implementing the strategy described in the revised ECS, including a closure by removal strategy for Plant Wansley.

This filing contains certain information that is being filed under the Commission's trade secret rules as explained in the basis for the assertion of trade secret information filed with the 2022 IRP in January.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Brandon F. Marzo", with a long horizontal flourish extending to the right.

Brandon F. Marzo

Enclosures (2)

1. April 2022 Environmental Compliance Strategy originally provided in Technical Appendix Volume 2
2. April 2022 revised CCR ARO Tables originally provided in Selected Supporting Information of Volume 1