Georgia Power

December 20, 2023

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

RE: Georgia Power Company's October 2023 Monthly Status Report;Docket No. 29849

Dear Ms. Tanner:

Enclosed for filing is Georgia Power Company's (the "Company") November 2023 Monthly Status Report (the "Report"). Estimates of costs and schedules contained in this Report are information available from the twenty-ninth semi-annual Vogtle Construction Monitoring report. The schedule and cost for Vogtle Units 3 and 4 are subject to change and may be revised as conditions necessitate. Also enclosed are the November 2023 updates to Data Requests STF-28-9, STF-29-1, STF-90-1, STF-132-19, STF-132-20, STF-142-4,and STF-156-1.

Should you have any questions, please call me at 404-506-3044.

Sincerely,

/s/ Kelley Balkcom

Kelley Balkcom
Director, Regulatory Affairs
mmcclosk@southernco.com

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

GEORGIA POWER COMPANY
DOCKET NO. 29849

BASIS FOR THE ASSERTION THAT CERTAIN DOCUMENTS PROVIDED TO THE CONSTRUCTION MONITOR ARE PROTECTED TRADE SECRETS

Pursuant to the stipulation adopted by the Georgia Public Service Commission (the "Commission") in its Amended Certification Order approving the certification of Plant Vogtle Units 3 and 4 (the "Project") in Docket No. 27800, and as part of the construction monitoring process, Georgia Power Company ("Georgia Power" or "the Company") submits its Monthly Status Report (the "Report"). In addition to the Report and upon request, Georgia Power provides to the Commission Staff and Dr. William Jacobs, in his capacity as Construction Monitor for the Vogtle Project, supplemental information and documentation regarding the Project, such as metrics reports, license updates, readiness review schedules, schedule information and analyses and other updates (the "Information"). Certain portions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Co-owners"), and their affiliates and contractors. Such portions of the Information are protected under Commission Rule 515-3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Public disclosure of the Information could give the Company's competitors, contractors, vendors, or suppliers an unfair advantage by showing the Company's cost, schedule, and project configuration, and that harm could in turn impair Georgia Power, the Co- owners, and their customers.

More specifically, the Information pertains to financial, commercial, planning, strategy, construction, schedule, and cost information related to the development of Vogtle Units 3 and 4 that is considered confidential and proprietary by the Company and is not generally known by the public. Potential competitors of the Company could use the trade secret portions of the Information to obtain a detailed picture of the Company's costs and project configuration and thereby gain a competitive advantage over the Company to the disadvantage of the Company's customers. Further, contractors, vendors, or suppliers could use the Company's projected costs and assumptions to tailor future bid proposals to create an artificial floor in pricing that could prohibit the Company from procuring equipment and services at the best cost for customers.

Additionally, the trade secret portions of the Information are subject to extensive efforts to maintain their confidentiality. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the trade secret portions of the Information. Those personnel receive access only on a "need to know" basis. Before a party outside of Georgia Power and Southern Company and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement with respect to the trade secret portions of the Information.

Vogtle Monthly Status Report
Through November 30, 2023

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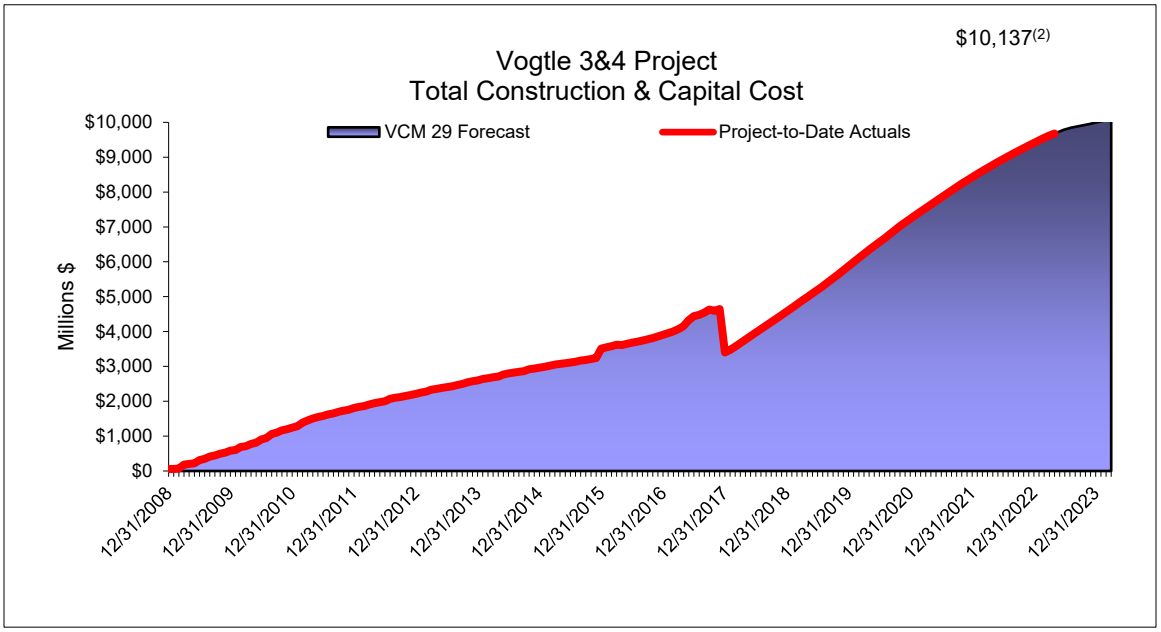
Executive Summary - Vogtle Monthly Status Report through November 30, 2023
Capital Expenditures (in millions of $) Georgia Power Ownership

Project-To-Date Actuals through November 2023

Construction and Capital Cost[1]	REDACTED
Construction Schedule Financing	REDACTED

Project Forecast as of VCM 29[2][3]

Forecast of Total Construction & Capital Cost (Net of Parent Guarantee)[4]	$10,137
Amount to be Absorbed by GPC	$ (694)
Allocated Contingency Included Above[4]	$(2,143)
Total Approved Construction & Capital Cost[5]	$7,300
Forecast of Construction Schedule Financing	$3,513



Major Milestones Achieved

- The replacement RCP-2A pump has been set, welded and final installation sequence remains in process.

Overall Project Status

- Georgia Power remains committed to safety, quality, and compliance on the Project. The Project additionally remains in favorable standing with the Nuclear Regulatory Commission ("NRC"), as indicated by its green status under the NRC's Construction Reactor Oversight Process.
- Unit 3 has surpassed 3.5 million net megawatt hours generated

Footnotes:

1. Total Construction & Capital Cost Project-To-Date Actuals through November 2023 include Toshiba Parent Guarantee and customer refund. This amount excludes construction monitor fees pursuant to the VCM 19 Order.
2. Forecasts of Total Construction & Capital Cost and Construction Schedule Financing reflect "Total Current Forecast" as presented in VCM 29. $7.3 billion is the Total Construction & Capital Cost approved by the GPSC (Order dated January 11, 2018). Above excludes $17 million in unspecified project contingency. Such amounts may be recommended for consideration by the GPSC as and when included in the Construction and Capital Cost forecast.
3. Above excludes approximately $567 million of costs incurred as of November 30, 2023, related to Georgia Power's cost-sharing settlement agreements with MEAG, OPC, and Dalton.
4. The Company is not requesting Commission approval of the $2.1 billion of contingency allocated to construction cost categories in this filing but may request that the Commission evaluate expenditures allocated to contingency for rate recovery as and when appropriate.
5. Excludes construction monitor fees pursuant to the VCM 19 Order.

Note: Details may not add to totals due to rounding.

Vogtle 3 & 4 Project
Georgia Power Company Cost
Project To Date
November 2023

(Millions of $)	Total Current Forecast	PTD Actual	PTD Budget	Variance	Notes on Variance
Construction & Capital Cost					
Original EPC[1]	$ 3,198	$ 3,198	$ 3,198	$ 0	
Interim Payments & Liens	411	409	410	(1)	
Site Construction Management					
Engineering Contractor	665	656	656	0	
Procurement	1,548	1,546	1,548	(2)	
Contract Construction	3,213	3,164	3,163	1	
Construction Support & Project Management	968	893	927	(34)	
Total Site Construction Management	**6,393**	**6,260**	**6,293**	**(34)**	
Owners Cost	1,233	1,201	1,211	(10)	
Ad Valorem	336	317	319	(1)	
Transmission Interconnection	62	62	62	(0)	
Test Fuel Offsets	(4)	(2)	(2)	(0)	
	1,627	1,578	1,590	(12)	
Total Construction & Capital Cost[4]	11,629	**11,445**	**11,491**	**(47)**	
Toshiba Parent Guarantee Payment, net of customer refunds	(1,492)	(1,492)	(1,492)	-	
Total to be Absorbed by GPC	(694)	(694)	(694)	-	
Allocated Contingency Included Above[4]	(2,143)	-	-	-	
Total Construction & Capital Cost, net of Parent Guarantee and amounts to be absorbed by GPC[5]	**$ 7,300** [2][3]	**$ 9,259**	**$ 9,305**	**$ (47)**	
Other Capital Cost					
Construction Monitor	33	28	29	(1)	

Project Schedule Financing					
Return on CWIP in Rate Base[6]	2,982	2,959	2,957	1	
AFUDC - Accrued on CWIP Above Original Certified Cost	422	394	398	(4)	
AFUDC - Accrued through Dec 2010 and Related Return	109	109	109	-	
Total Project Schedule Financing	**$ 3,513**	**$ 3,462**	**$ 3,465**	**$ (3)**	

Total Capital Cost and Financing[5]	**$ 10,813**	**$ 12,721**	**$ 12,770**	**$ (50)**	

Footnotes:

1. Includes Original EPC contract payment milestones and EPC Scope Change.

2. $7.3 billion is the Total Construction & Capital Cost approved by Georgia Public Service Commission Order dated January 11, 2018 ("VCM 17 Order"). Above excludes $17 million in unspecified project contingency. Such amounts may be recommended for consideration by the GPSC as and when included in the Construction and Capital Cost forecast.

3. Above excludes approximately $567 million of costs incurred as of November 30, 2023, related to Georgia Power's cost-sharing settlement agreements with MEAG, OPC, and Dalton.

4. The Company is not requesting Commission approval of the $2.1 billion of contingency allocated to construction cost categories in this filing but may request that the Commission evaluate expenditures allocated to contingency for rate recovery as and when appropriate.

5. Excludes construction monitor fees pursuant to the VCM 19 Order.

6. NCCR will only be collected on the certified capital cost of $4.418 billion per the January 3, 2017 Order Adopting Stipulation and VCM 17 Order.

Note: Details may not add to totals due to rounding.

Vogtle 3 & 4 Project
Georgia Power Company Cost
Year To Date
November 2023

(Millions of $)	Current Month Actuals	Current Month Budget	YTD Actual	YTD Budget	YTD Variance	Notes on Variance
Construction & Capital Cost						
Original EPC[1]	$ -	-	$ -	$ -	$ -	
Interim Payments & Liens	-	0	-	1	(1)	
Site Construction Management						
Engineering Contractor	2	2	59	59	0	
Procurement	2	2	85	87	(2)	
Contract Construction	1	0	112	111	1	
Construction Support & Project Management	7	21	155	189	(34)	
Total Site Construction Management	**13**	**25**	**412**	**445**	**(34)**	
Owners Cost	7	10	95	105	(10)	
Ad Valorem	2	4	40	42	(1)	
Transmission Interconnection	0	0	0	0	(0)	
Test Fuel Offsets	-	-	(2)	(2)	(0)	
Total Construction & Capital Cost[4]	**22**	**39**	**545**	**591**	**(47)**	
Toshiba Parent Guarantee, net of customer refunds	-	-	-	-	-	
Total to be Absorbed by GPC	-	-	-	-	-	
Allocated Contingency Included Above[4]	-	-	-	-	-	
Total Construction & Capital Cost, net of Parent Guarantee and amounts to be absorbed by GPC[2][3][4]	**$ 22**	**$ 39**	**$ 545**	**$ 591**	**$ (47)**	
Other Capital Cost						
Construction Monitor	1	1	7	8	(1)	

Project Schedule Financing						
Return on CWIP in Rate Base[6]	10	10	152	150	1	
AFUDC - Accrued on CWIP Above Original Certified Cost	5	6	90	94	(4)	
AFUDC - Accrued through Dec 2010 and Related Return	-	-	-	-	-	
Total Project Schedule Financing	**$ 15**	**$ 15**	**$ 242**	**$ 245**	**$ (3)**	

Total Capital Cost and Financing[5]	**$ 37**	**$ 54**	**$ 786**	**$ 836**	**$ (50)**	

Footnotes:

1. Includes Original EPC contract payment milestones and EPC Scope Change.

2. $7.3 billion is the Total Construction & Capital Cost approved by Georgia Public Service Commission Order dated January 11, 2018 ("VCM 17 Order"). Above excludes $17 million in unspecified project contingency. Such amounts may be recommended for consideration by the GPSC as and when included in the Construction and Capital Cost forecast.

3. Above excludes approximately $567 million of costs incurred as of November 30, 2023, related to Georgia Power's cost-sharing settlement agreements with MEAG, OPC, and Dalton.

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Note: Details may not add to totals due to rounding.

Vogtle 3 & 4 Project
Georgia Power Company Investment
Project To Date
November 2023
(in millions)

CWIP Beginning Balance[1]	Additions[1]	Accruals[1]	AFUDC[2]	Ad Valorem and Other	Closures[3]	CWIP Balance at 11/30/23[1]
$ -	$ 9,612	$ 51	$ 394	$ 317	$ (4,532)	$ 5,843

Schedule of Additions

	Additions	Accruals	Net Additions[1]
Original EPC	$ 3,161	$ 37	$ 3,198
Interim Payment & Liens	409	(1)	$ 409
Site Construction Management			
Engineering Contractor	662	(6)	$ 656
Procurement	1,545	1	$ 1,546
Contract Construction	3,167	(2)	$ 3,164
Construction Support & Project Management	878	15	$ 893
Owners Costs	1,223	6	$ 1,229
Transmission	61	1	$ 62
Toshiba Parent Guarantee Payment	(1,492)	-	$ (1,492)
Test Fuel Offsets	(2)	-	$ (2)
	$ 9,612	$ 51	$ 9,664

(1) Includes Construction Monitor Costs, Certification Fees and Independent Evaluator Costs.
(2) AFUDC accrued on CWIP above original certified cost. The $91M of 2009-2010 AFUDC was fully amortized and recovered through the NCCR tariff in accordance with the Georgia Nuclear Energy Financing Act (SB31).
(3) Closed to plant in-service.

Note: Total excludes approximately $567 million of costs incurred as of November 30, 2023, related to Georgia Power's cost-sharing settlement agreements with MEAG, OPC, and Dalton.

Note: Details may not add to totals due to rounding.

Vogtle 3 & 4 Project
Georgia Power Company Investment
Year To Date
November 2023
(in millions)

CWIP Balance at 01/01/23[1]	Additions[1]	Accruals[1]	AFUDC[2]	Ad Valorem and Other	Closures[3]	CWIP Balance at 11/30/23(1)
$ 9,649	$ 537	$ (25)	$ 90	$ 40	$ (4,447)	$ 5,843

Schedule of Additions

	Additions	Accruals	Net Additions[1]
Original EPC	$ -	$ -	$ -
Interim Payment & Liens	-	-	$ -
Site Construction Management			
Engineering Contractor	70	(11)	$ 59
Procurement	98	(13)	$ 85
Contract Construction	119	(7)	$ 112
Construction Support & Project Management	151	4	$ 155
Owners Costs	101	1	$ 102
Transmission	0	0	$ 0
Toshiba Parent Guarantee Payment	-	-	$ -
Test Fuel Offsets	(2)	-	$ (2)
	$ 537	$ (25)	$ 512

(1) Includes Construction Monitor Costs, Certification Fees and Independent Evaluator Costs.
(2) AFUDC accrued on CWIP above original certified cost. The $91M of 2009-2010 AFUDC was fully amortized and recovered through the NCCR tariff in accordance with the Georgia Nuclear Energy Financing Act (SB31).
(3) Closed to plant in-service.

Note: Total excludes approximately $567 million of costs incurred as of November 30, 2023, related to Georgia Power's cost-sharing settlement agreements with MEAG, OPC, and Dalton.

Note: Details may not add to totals due to rounding.

Vogtle 3 & 4 Project
Georgia Power Company Investment
Current Month
November 2023
(in millions)

CWIP Balance at 11/01/23[1]	Additions[1]	Accruals[1]	AFUDC[2]	Ad Valorem and Other	Closures[3]	CWIP Balance at 11/30/23(1)
$ 5,816	$ 25	$ (4)	$ 5	$ 2	$ (0)	$ 5,843

Schedule of Additions

	Additions	Accruals	Net Additions[1]
Original EPC	$ -	$ -	$ -
Interim Payment & Liens	-	-	$ -
Site Construction Management			
Engineering Contractor	3	(0)	$ 2
Procurement	5	(4)	$ 2
Contract Construction	1	(0)	$ 1
Construction Support & Project Management	7	0	$ 7
Owners Costs	8	(0)	$ 8
Transmission	0	0	$ 0
Toshiba Parent Guarantee Payment	-	-	$ -
Test Fuel Offsets	-	-	$ -
	$ 25	$ (4)	$ 21

(1) Includes Construction Monitor Costs, Certification Fees and Independent Evaluator Costs.
(2) AFUDC accrued on CWIP above original certified cost. The $91M of 2009-2010 AFUDC was fully amortized and recovered through the NCCR tariff in accordance with the Georgia Nuclear Energy Financing Act (SB31).
(3) Closed to plant in-service.

Note: Total excludes approximately $567 million of costs incurred as of November 30, 2023, related to Georgia Power's cost-sharing settlement agreements with MEAG, OPC, and Dalton.

Note: Details may not add to totals due to rounding.

Licensing - Vogtle 3 & 4 COLA Schedule

SNC starts Application development	Jun 01, 2006 (A)
SNC submits Application	Mar 31, 2008 (A)
NRC completes sufficiency review	May 30, 2008 (A)
Requests for information with the Staff	Jul 2008 – Jan 14, 2009 (A)
NRC conducts public meeting of overall submittal	Jul 17, 2008 (A)
NRC notices availability and opportunity for intervention	Sep 16, 2008 (A)
NRC issues draft environmental impact statement	August 26, 2010 (A)
NRC conducts public environmental meeting	October 7, 2010 (A)
NRC issues last advance Safety Evaluation Report (SER) material	December 2, 2010 (A)
ACRS completes review on SER material	December 17, 2010 (A)
NRC issues Final Environmental Impact Statement (FEIS)	March 18, 2011(A)
SNC issues COLA Rev 5 to tie to DCD Rev 19	July 24, 2011(A)
NRC issues COL FSER	August 5, 2011 (A)
NRC issues COL SECY	August 9, 2011 (A)
NRC COL Hearing	September 27-28, 2011 (A)
NRC affirms AP1000 DCD	December 22, 2011 (A)
NRC publishes DCD in Federal Register	December 30, 2011 (A)
NRC issues LWA-B	February 10, 2012 (A)
NRC issues Vogtle COLs	February 10, 2012 (A)

(A) - Actual

	Permit	Activity Covered	Agency	Jurisdiction	Permit/Reference No.	Date Received	Expiration Date
1.	Early Site Permit (ESP) and Limited Work Authorization (LWA)	ESP – Site approval for nuclear plant construction; LWA – approval for limited safety-related work	NRC	Federal	ESP-004	August 26, 2009	August 26, 2029
2.	Combined Operating Licenses (COLs)	Safety-related construction for a nuclear power facility	NRC	Federal	NPF-91, NPF-92	February 10, 2012	N/A
3.	Limited Work Authorization (LWA-B)	Approval for nuclear island rebar and embeds and placement of NI base slab	NRC	Federal	LWA-001 LWA-002	February 10, 2012	N/A
4.	Certificate of Registration	Transportation of Hazardous Material	USDOT	Federal	061523550376F	July 1, 2023	June 30, 2024
5.	Migratory Bird Treaty Act Special Purpose – Utility (Avian Mortality Monitoring) F.K.A. Salvage Permit	Handling of migratory bird carcasses and relocation of certain nests	USFWS	Federal	MB745135-0	June 14 2018	March 31, 2024
6.	Clean Water Act Section 404 and Rivers and Harbors Act Section 10 Permit	Disturbance of crossing wetland areas or navigable waters; New intake/discharge infrastructure in Savannah River	USACE	Federal	SAS-2007-01837	September 30, 2010; modified March 2, 2011, Renewal September 29, 2015, Modified September 2, 2020 (Final Signature by USACE)	September 30, 2020 (No Longer Applicable)
7.	Private Aids to Navigation	Aids to navigation at discharge infrastructure	USCG	Federal	N/A	October 30, 2013	October 30, 2014 (No Longer Applicable)
8.	Section 401 Certification	Compliance with water quality standards	GDNR	State	JPN 200701837	June 1, 2010	N/A
9.	Certificate of Public Convenience and Necessity	Present and future public convenience and necessity requiring the operation of such equipment or facility	GA PSC	State	Docket No. 27800-U	March 17, 2009	N/A

	Permit	Activity Covered	Agency	Jurisdiction	Permit/Reference No.	Date Received	Expiration Date
10.	Georgia SIP Synthetic Minor Air Permit	Construction air emission sources	GDNR	State	169-033-039-S-03-0(Amended permit No. 169-033-039-S-03-1)	November 8, 2016 (as amended as a result of a name change effective March 15, 2018)	N/A
11.	Georgia PSD Construction and Part 70 Operating Air Permit	Construction of plant air emission sources	GDNR	State	4911-033-0030-V-02-3	April 9, 2010 (construction) June 14, 2010 (operation)	N/A
12.	Title V Operating Permit	Operation of air emission sources	GDNR	State	4911-033-0030-V-04-0	October 31, 2018	October 31, 2023. Application for renewal was submitted on April 28, 2023.
13.	Permit to Operate a Public Water System	Operate a public, non-transient, non-community water system	GDNR	State	PG0330056	July 6, 2020	July 5, 2030
14.	Permit to Withdraw Groundwater – Make up Wells 3 and 4	Consumptive use of 100,000 gallons per day or more of groundwater	GDNR	State	017-0003	August 4, 2020	August 4, 2030
15.	Permit to Withdraw Groundwater – Dewatering Activities	Dewater for foundation if needed for more than 60 days	GDNR	State	017-0006	March 9, 2012 (renewed January 23, 2018)	January 23, 2021 (Permit was revoked on March 1, 2019, due to completion of all activities associated with the permit)

	Permit	Activity Covered	Agency	Jurisdiction	Permit/Reference No.	Date Received	Expiration Date
16.	Solid Waste Handling Permit	Collection and transportation of garbage and other putrescible waste for disposal in an off-site municipal solid waste landfill	GDNR	State	PBR-017-07COL	December 28, 2000	N/A
17.	Solid Waste Landfill Buffer Variance (Landfill #2)	Variance from buffer requirements for Landfill #2 to accommodate haul road and surface water intake pipe construction	GDNR	State	Permit No. 017-006D(LI)	February 5, 2010	N/A
18.	Private Industrial Landfill Certificate of Clean Closure (Landfill #3)	Certificate of Clean Closure of Landfill #3 to construct Vogtle 3 & 4	GDNR	State	017-007D(LI)	August 13, 2010	N/A
19.	No Further Action Status for Removal of Underground Storage Tanks	Removal of USTs to construct Vogtle 3 & 4	GDNR	State	N/A	December 1, 2009	N/A
20.	Hazardous Waste Generation Facility Wide EPA I.D. Number	Necessary to generate hazardous waste	GDNR	State	GAD094066321	November 5, 2013 (amended notification recognized by GDNR)	N/A
21.	Scientific Collecting Permit	State permit for collection of specimens	GDNR	State		Future Consent	
22.	State Waters Buffer Variance	Land disturbing activities within 25' state waters buffer	GDNR	State	BV-017-10-01	April 29, 2010	N/A
23.	NPDES Wastewater Permit	Regulates limits of pollutants in liquid discharge to surface water (Ready-Mixed Concrete Batch Plant)	GDNR	State	GA0039276	March 27, 2015	Permit allowed to expire, as it is no longer needed for the project.

	Permit	Activity Covered	Agency	Jurisdiction	Permit/Reference No.	Date Received	Expiration Date
24.	NPDES Wastewater Permit	Regulates limits of pollutants in liquid discharge to surface water (Units 1 & 2)	GDNR	State	GA0026786	June 30 2019	July 31, 2024
25.	Infrastructure Projects Construction Storm Water Permit	Discharge storm water from linear construction sites (e.g. Roadways, transmission line and rail corridor) (On-Site Switchyard)	GDNR	State	GAR100002	September 24, 2013	July 31, 2018 (No Longer Applicable)
26.	Stand-Alone Construction Projects Storm Water Permit	Discharge storm water from site during construction (Construction Activities)	GDNR	State	GAR100001	October 9, 2018	July 31, 2023
27.	NPDES Wastewater Permit	Regulates limits of pollutants in liquid discharge to surface water	GDNR	State	GA0039420	September 23, 2015	November 30, 2026
28.	General Permit for Industrial Storm Water Discharges	Discharge storm water associated with industrial activity	GDNR	State		Future Consent	
29.	Permit to Withdraw Surface Water	Surface water withdrawal	GDNR	State	017-0191-11	December 5, 2014	December 4, 2024
30.	General Permit to Transport Radioactive Materials	Transportation of radioactive materials in the State of Georgia	GDNR/GDPS	State		Future Consent	
31.	Tennessee Radioactive Waste License-for-Delivery	Transportation of radioactive materials into the State of Tennessee	TDEC	State		Future Consent	
32.	Utah Radiation Control Rule	Transportation of radioactive materials into the State of Utah	UDEQ	State		Future Consent	

	Permit	Activity Covered	Agency	Jurisdiction	Permit/Reference No.	Date Received	Expiration Date
33.	South Carolina Radioactive Waste Transport Permit	Transportation of radioactive materials into the State of South Carolina	SCDHEC	State		Future Consent	
34.	Texas Radioactive Waste Transport	Transportation of radioactive materials into the State of Texas	TCEQ	State		Future Consent	
35.	Scientific Collecting Permit	State permit for collection of specimens	SCDNR	State		Future Consent	
36.	Building Permit (Security Training Facility) and Certificate of Occupancy (Training Center B)	Construction, alteration, repair, or demolition of any building or structure within the boundaries of Burke County	Burke County	County	Permit No. 751 (Security) Permit Nos. 764 & 765 (Security) Permit No. B-28-10 (Training Center B)	Sept. 24, 2013 (No. 751) Oct. 3, 2013 (Nos. 764 & 765) July 20, 2011 (Training Center B)	N/A
37.	Utility Encroachment Permit	Placement of utilities on County right of way	Burke County	County	6-26	November 12, 2013	N/A
38.	Hazardous Waste Generation Facility Wide EPA I.D. Number	Necessary to generate hazardous waste	GDNR	State	GAR000075085	October 8, 2014 (Standalone Vogtle 3&4 EPA ID to support construction)	N/A
39.	Letter of Permission	Installation of the Dissolved Oxygen Injection System in Savannah River, as required by the Surface Water Withdrawal Permit	USACE	Federal	SAS-2005-01902	December 18, 2020	December 18, 2023

Data Request	Description	Update Included*
STF-28-9	Organizational Charts	☒
STF-29-1	Project Correspondence	☒
STF-43-1-b	COL Issued Amendments	☐
STF-44-1	Quarterly Aggregate Trend Report ONLY EACH QUARTER	☐
STF-90-1	Project Schedule Information	☒
STF-132-19	Reports provided to Project co-owners	☒
STF-132-20	Presentations provided to Project co-owners	☒
STF-142-4	Update to risk register	☒
STF-156-1	Documents provided to on-site consultants	☒

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 29849

Data Request No. STF-28-9

Basis for the Assertion that Redacted Portions of the Information Submitted are Protected Trade Secrets

In response to Data Request STF-28-9, in Georgia Public Service Commission Docket No. 29849, Georgia Power Company ("Georgia Power" or the "Company") has provided information (the "Information"). Certain provisions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Co- owners"), and their affiliates and contractors. These provisions of the Information are protected under Commission Rule 515-3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Public disclosure of the Information could give competitors an unfair advantage by showing the Company's costs, schedule and project configuration and that harm could in turn impair Georgia Power, the Co-owners and their customers.

More specifically, the Information that has been redacted contains sensitive planning information for Vogtle Units 3 and 4. This Information is considered confidential and proprietary by the Company and is not generally known by the public. Potential competitors of the Company could use the Information to obtain a detailed picture of the Company's procurement, staffing and construction plans and thereby gain a competitive advantage to the disadvantage of the Company's customers.

Additionally, the Information is subject to extensive efforts to maintain its secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the Information. Those personnel receive access only on a "need to know" basis. If a party outside Georgia Power and Southern Company and their legal counsel are granted access to the Information, the party is required to sign a confidentiality agreement.

November 2023 Update to STF-28-9
REDACTED IN ITS ENTIRETY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 29849

Data Request No. STF-29-1 Update

BASIS FOR THE ASSERTION THAT PORTIONS OF THE INFORMATION SUBMITTED ARE PROTECTED TRADE SECRETS

In response to Data Request STF-29-1, in Georgia Public Service Commission Docket No. 29849, Georgia Power Company ("Georgia Power" or the "Company") has provided information (the "Information"). Certain provisions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Co- owners"), and their affiliates and contractors. These provisions of the Information are protected under Commission Rule 515-3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Public disclosure of the Information could give competitors an unfair advantage by showing the Company's costs, schedule and project configuration and that harm could in turn impair Georgia Power, the Co-owners and their customers.

More specifically, the trade secret portions of the Information that have been redacted contain information related to the performance, strategies, metrics, and management of Westinghouse Electric Company LLC and its affiliates ("Westinghouse") and Bechtel Corporation ("Bechtel") with respect to the engineering, procurement, and construction of Plant Vogtle Units 3 and 4. The Information consists of correspondence between Company senior management, Westinghouse, and Bechtel related to their performance, as well as commercial issues that have arisen between Westinghouse, Bechtel, and the Co-owners. This Information is considered confidential and proprietary by the Company and its contractors and is not generally known by the public.

Moreover, public release of the trade secret portions of the Information could have adverse economic consequences for the Company. Public release of the trade secret portions of the Information could make potential vendors unwilling or unable to conduct business with the Company. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to contract with the Company, thus, reducing the opportunity for the Company to procure the best options to meeting its customers' needs and potentially compelling the Company to deal with a vendor that does not offer the best cost option. This could cause significant added costs to the Company and ultimately to Georgia Power's ratepayers.

Additionally, the Information is subject to extensive efforts to maintain its secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the Information. Those personnel receive access only on a "need to know" basis. If a party outside Georgia Power and Southern Company and their legal counsel are granted access to the Information, the party is required to sign a confidentiality agreement.

November 2023 Update to STF-29-1
REDACTED IN ITS ENTIRETY

Unit 3 Amendment No.	Unit 4 Amendment No.	SNC Request Number	WEC LAR No.	Title	TAC or EPID #	Submittal Date	NRC Approval Date	Project Need Date	PAR Needed?	First "No Objection" Letter Date	ADAMS Accession No. for Amendment
002	002	LAR-12-003R	032	Nuclear Island Basemat Thickness Tolerance	RP9403	05-07-2012	10-25-2012	11-16-2012	Yes - Received	06-04-2012	ML12278A411
001	001	LAR-12-007	036	NI Basemat Concrete / Rebar Details	RP9411	08-01-2012	10-18-2012	11-16-2012	Yes - Received	08-02-2012	ML12268A128
		ND-20-0204	N/A	Request for Exemption from 10 CFR 50 Appendix E IV.F.2.a.(iii) for Unit 4	L-2020-LLE-0012	03-06-2020	07-21-2020		No		ML20126G294
		IST-ALT-002	N/A	Code Alternative for Inservice Testing of Main Turbine System Valves		04-08-2022	09-14-2022	11-05-2022	No		
		VEGP 3&4-PSI/ISI-ALT-14	N/A	Proposed Alternative Requirements for Preservice Inspection Acceptance of Volumetric Examinations	L-2020-LLR-0080	06-12-2020	09-17-2020		No		ML20147A663
		VEGP 3&4-PSI/ISI-ALT-15	N/A	Proposed Alternative Requirements for ASME Section XI Examination Coverage of Weldolet Branch Connection Welds	L-2020-LLR-0159	12-23-2020	04-09-2021	03-20-2021	No		ML21090A245
		VEGP 3-ALT-16	N/A	Alternative Requirements for ASME Section III Remediation of Containment Vessel Unistrut Welding	L-2021-LLR-0041	06-03-2021	07-25-2021	07-30-2021	No		ML21203A317
		Exemption	N/A	Vogtle Unit 3 Operator License Exemption for Dual Unit Licenses		07-08-2021	11-30-2021				
		Exemption	N/A	Physical Protection Program and Access Authorization Program Implementation		11-01-2021	11-29-2021				
		Exemption	N/A	Applicability of 10 CFR 26.3, Scope, Until Initial Fuel Load	L-2021-LLE-0051	11-12-2021	12-22-2021	12-20-2021			
		VEGP 3&4-ISI1-ALT-17	N/A	Alternative Inspection Requirements for Steam Generator Nozzle to Reactor Coolant Pump Casing Welds		11-04-2022	04-14-2023				
		VEGP 3&4-ISI1-ALT-18	N/A	Alternative for Use of Code Case N-648-2 for Inservice Inspection of the Reactor Vessel Nozzle Inside Radius Sections		11-04-2022	05-04-2023				ML23109A069
	173	LAR-19-016	230	Reinforcement Changes for Wall L and Wall 7.3	L-2019-LLA-0181	08-22-2019	02-03-2020	05-20-2021	Yes	09-09-2019	ML20013G569

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 29849

Data Request No. STF-90-1

Basis for the Assertion that Redacted Portions of the Information Submitted are Protected Trade Secrets

In response to Data Request STF-90-1, in Georgia Public Service Commission Docket No. 29849, Georgia Power Company ("Georgia Power" or the "Company") has provided information (the "Information"). Certain provisions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Co-owners"), and their affiliates and contractors. These provisions of the Information are protected under Commission Rule 515- 3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Public disclosure of the Information could give competitors an unfair advantage by showing the Company's costs, schedule and project configuration and that harm could in turn impair Georgia Power, the Co-owners and their customers.

More specifically, the Information that has been redacted is information related to the project schedule. The Company and its contractors developed this detailed schedule information only through extensive efforts. Public disclosure of this Information would expose the Company's internal methods of assessing the schedule. Georgia Power's competitors are not required to disclose their respective project schedule information. Competitors, in turn, could emulate these strategies that the Company developed only after its own significant time and investment. Moreover, if prospective vendors or subcontractors had access to the trade secret portions of the Information, the Company would be placed at an economic disadvantage because the prospective vendors and subcontractors could use of the information to inflate prices for construction services or materials to the detriment of the Company and its customers.

Public release of the trade secret portions of the Information could have adverse economic consequences for the Company. Public release of the trade secret portions of the Information could make potential vendors unwilling or unable to conduct business with the Company. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to contract with the Company, thus, reducing the opportunity for the Company to procure the best options to meeting its customers' needs and potentially compelling the Company to deal with a vendor that does not offer the best cost option. This could cause significant added costs to the Company and ultimately to Georgia Power's ratepayers.

Additionally, the Information is subject to extensive efforts to maintain its secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the Information. Those personnel receive access only on a "need to know" basis. If a party outside Georgia Power and Southern Company and their legal counsel are granted access to the Information, the party is required to sign a confidentiality agreement.

GEORGIA POWER COMPANY
Docket No. 29849
Staff Data Request No STF-90

STF-90-1 (November 2023 Supplement)

Question:

This data request supersedes Staff's Data Request STF-86-13 under docket 29849. Please consider this a standing Data Request. Please provide Staff with the Level 3 Integrated Project Schedule ("IPS") dated 4/21/2016 in 'XER' format containing the same data as provided by the Contractor, the construction percent complete curves, and the engineering completion schedules (if not included in the Level 3 IPS. In addition, please provide the Level 2 IPS dated 4/21/2016 in 'XER' format that is resource loaded (including but not limited to quantities of labor (craft only and materials and the Level 1 IPS in Excel format. Provide this information for both Units. The first response under this Data Request shall be due 30 days from this filing. Each subsequent response beginning in August 2016 should be made by the 20th of each month.

Response:

Please see the electronic Trade Secret ("TS") Attachments STF-90-1 folder.

Contact: Jeremiah Haswell

November 2023 Update to STF-90-1
REDACTED IN ITS ENTIRETY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 29849

Data Request No. STF-132-19

Basis for the Assertion that Redacted Portions of the Information Submitted are Protected Trade Secrets

In response to Data Request STF-132-19, in Georgia Public Service Commission Docket No. 29849, Georgia Power Company ("Georgia Power" or the "Company") has provided Information (the "Information"). Certain provisions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Owners"), and their affiliates and contractors. These portions of the Information are protected under Commission Rule 515-3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Public disclosure of the trade secret portions of the Information could give competitors and vendors an unfair advantage by showing the information related to the Company's and its contractors' confidential assessments, progress reports, analyses, forecasts, projections, and project configuration. The resulting economic harm could in turn impair Owners, Owners' affiliates and contractors, and Owners' customers.

More specifically, the Information that has been redacted contains confidential details relating to the management of costs, schedules, and future work on the Plant Vogtle Units 3 and 4 Project, as well as strategies to maintain and improve project performance. These portions of the Information are considered confidential and proprietary by the Company and its contractors and are generally not known to the public. Public release of this Information would reveal proprietary methods for analyzing and reporting project performance, giving potential competitors a detailed picture of the Company's and its contractors' internal management and evaluation process details, which could result in the competitors gaining a competitive advantage to the disadvantage of the Company's customers. The public disclosure of this Information would also harm the Company and its contractors because competitors could emulate these approaches without investing the significant time and effort that the Company invested to develop these processes.

Public release of the trade secret portions of the Information could also make potential vendors unwilling or unable to conduct business with the Company. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to contract with the Company, thus reducing the opportunity for the Company to procure the best options to meeting its customers' needs and potentially compelling the Company to deal with a vendor that does not offer the best cost option. This could cause significant added costs to the Company and ultimately to Georgia Power's customers.

The trade secret portions of the Information are subject to extensive efforts to maintain their secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to this information. Those personnel receive access only on a "need to know" basis. If a party outside Georgia Power and Southern Company and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement.

GEORGIA POWER COMPANY
Docket No. 29849
Staff Data Request No STF-132

STF-132-19 (November 2023 Supplement)

Question:

If not already provided to Staff, please provide a copy of all reports, analyses, variance reports and all other documents provided to the Co-owners each month or when the reports, analyses and other documents are updated. Please consider this to be a standing data request.

Response:

The Company and Staff mutually agreed to a list of documents provided to Co-owners that will be supplied for this Data Request and in subsequent Monthly Status Reports. Please see the electronic Trade Secret ("TS") Attachments STF-132-19 folder.

Contact: Jeremiah Haswell

November 2023 Update to TS Attachments
STF-132-19 REDACTED IN THEIR ENTIRETY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 29849

Data Request No. STF-132-20

Basis for the Assertion that Redacted Portions of the Information Submitted are Protected Trade Secrets

In response to Data Request STF-132-20, in Georgia Public Service Commission Docket No. 29849, Georgia Power Company ("Georgia Power" or the "Company") has provided Information (the "Information"). Certain provisions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Owners"), and their affiliates and contractors. These portions of the Information are protected under Commission Rule 515-3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Public disclosure of the trade secret portions of the Information could give competitors and vendors an unfair advantage by showing the Company's analyses, forecasts, plans, strategies and commercial terms. The resulting economic harm could in turn impair Owners, Owners' affiliates and contractors, and Owners' customers.

More specifically, the trade secret portions of the Information that have been redacted pertain to the Company's reports, analyses, variance reports, schedule information, budgets, strategies, commercial terms, and project configuration. The Company developed this detailed information only through extensive efforts. Public disclosure of this Information would expose the Company's internal methods for performing these assessments. Georgia Power's competitors are not required to disclose their respective project information of this nature. Competitors, in turn, could emulate these strategies that the Company developed only after its own significant time and investment. Moreover, if prospective vendors or subcontractors had access to the trade secret portions of the Information, the Company would be placed at an economic disadvantage because the prospective vendors and subcontractors could use of the information to inflate prices for construction services or materials to the detriment of the Company and its customers.

Public release of the trade secret portions of the Information could have adverse economic consequences for the Company. Public release of the trade secret portions of the Information could make potential vendors unwilling or unable to conduct business with the Company. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to contract with the Company, thus, reducing the opportunity for the Company to procure the best options to meeting its customers' needs and potentially compelling the Company to deal with a vendor that does not offer the best cost option. This could cause significant added costs to the Company and ultimately to Georgia Power's customers.

The trade secret portions of the Information are subject to extensive efforts to maintain their secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to this information. Those personnel receive access only on a "need to know" basis. If a party outside Georgia Power and Southern Company and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement.

GEORGIA POWER COMPANY
Docket No. 29849
Staff Data Request No STF-132

STF-132-20 (November 2023 Supplement)

Question:

If not already provided to Staff, please provide a copy of all handouts and meeting presentation slides provided to the Co-owners related to Project cost and schedule beginning 01/01/2018 to the date of this data request. Please consider this to be a standing data request.

Response:

Please see electronic Trade Secret ("TS") folder STF-132-20.

Contact: Jeremiah Haswell

November 2023 Update to TS Attachments STF-132-20
REDACTED IN THEIR ENTIRETY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 29849

Data Request No. STF-142-4

Basis for the Assertion that Redacted Portions of the Information Submitted are Protected Trade Secrets

In response to Data Request STF-142-4, in Georgia Public Service Commission Docket No. 29849, Georgia Power Company ("Georgia Power" or the "Company") has provided Information (the "Information"). Certain provisions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Owners"), and their affiliates and contractors. These portions of the Information are protected under Commission Rule 515-3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Public disclosure of the trade secret portions of the Information could give competitors and vendors an unfair advantage by showing the Company and its contractors' analyses, forecasts, plans, strategies and project configuration. The resulting economic harm could in turn impair Owners, Owners' affiliates and contractors, and Owners' customers.

More specifically, the trade secret portions of the Information that have been redacted contain estimates of cost impacts, analyses of risks, and forecasts that the Company and its contractors developed to forecast the cost of completing the Plant Vogtle Units 3 and 4 Project. This information is considered confidential and proprietary by the Company and its contractors and is not generally known by the public. If prospective vendors or subcontractors had access to these trade secret portions of the Information, the Company would be placed at an economic disadvantage because vendors or subcontractors could use of the information to inflate prices for construction services or materials to the detriment of the Company and its customers. In addition, disclosure of this information would expose the Company and its contractors' internal methods of assessing the cost and schedule for managing the construction of the Plant Vogtle Units 3 and 4 Project. These strategies were developed only after significant time and investment by the Company and its contractors.

Public release of the trade secret portions of the Information could have adverse economic consequences for the Company. Public release of the trade secret portions of the Information could make potential vendors unwilling or unable to conduct business with the Company. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to contract with the Company, thus, reducing the opportunity for the Company to procure the best options to meeting its customers' needs and potentially compelling the Company to deal with a vendor that does not offer the best cost option. This could cause significant added costs to the Company and ultimately to Georgia Power's customers.

The trade secret portions of the Information are subject to extensive efforts to maintain their secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to this information. Those personnel receive access only on a "need to know" basis. If a party outside Georgia Power and Southern Company and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement.

GEORGIA POWER COMPANY
Docket No. 29849
Staff Data Request No STF-142

STF-142-4 (November 2023 Supplement)

Question:

Please update STF-132-9 as of July 1st, 2018. If a particular risk has changed please highlight the change and provide an explanation for the change. Please also highlight new risks and contingencies. Consider this a standing data request to be updated on a monthly basis.

Response:

Please see electronic Trade Secret ("TS") Attachment STF-142-4.

Contact: Jeremiah Haswell

November 2023 Update to TS Attachment STF-142-4
REDACTED IN ITS ENTIRETY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 29849

Data Request No. STF-156-1

Basis for the Assertion that Redacted Portions of the Information Submitted are Protected Trade Secrets

In response to Data Request STF-156-1, in Georgia Public Service Commission Docket No. 29849, Georgia Power Company ("Georgia Power" or the "Company") has provided Information (the "Information"). Certain provisions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Owners"), and their affiliates and contractors. These portions of the Information are protected under Commission Rule 515-3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Public disclosure of the trade secret portions of the Information could give competitors and vendors an unfair advantage by showing the information related to the Company's and its contractors' confidential assessments, progress reports, analyses, forecasts, projections, and project configuration. The resulting economic harm could in turn impair Owners, Owners' affiliates and contractors, and Owners' customers.

More specifically, the Information that has been redacted contains confidential details relating to the management of costs, schedules, and future work on the Plant Vogtle Units 3 and 4 Project, as well as strategies to maintain and improve project performance. These portions of the Information are considered confidential and proprietary by the Company and its contractors and are generally not known to the public. Public release of this Information would reveal proprietary methods for analyzing and reporting project performance, giving potential competitors a detailed picture of the Company's and its contractors' internal management and evaluation process details, which could result in the competitors gaining a competitive advantage to the disadvantage of the Company's customers. The public disclosure of this Information would also harm the Company and its contractors because competitors could emulate these approaches without investing the significant time and effort that the Company invested to develop these processes.

Public release of the trade secret portions of the Information could also make potential vendors unwilling or unable to conduct business with the Company. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to contract with the Company, thus reducing the opportunity for the Company to procure the best options to meeting its customers' needs and potentially compelling the Company to deal with a vendor that does not offer the best cost option. This could cause significant added costs to the Company and ultimately to Georgia Power's customers.

The trade secret portions of the Information are subject to extensive efforts to maintain their secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to this information. Those personnel receive access only on a "need to know" basis. If a party outside Georgia Power and Southern Company and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement.

GEORGIA POWER COMPANY
Docket No. 29849
Staff Data Request No STF-156

STF-156-1 (November 2023 Supplement)

Question:

Please file copies of all documents provided to PSC Staff's on-site consultant for each month with the subsequent month's Monthly Supplemental Reports filing. Please consider this a standing data request.

Response:

During the month of November 2023, materials included as part of the Plan of the Day ("POD") meeting, Testing Control Center ("TCC"), and Work to Go ("WTG"), Daily Condition Reports ("CRs") documents were provided to VMG's on-site consultant and are available upon request. There were no additional documents provided during the month of November 2023.

Contact: Jeremiah Haswell

November 2023 Update to TS Attachments STF-156-1
REDACTED IN THEIR ENTIRETY