Georgia Power

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PUBLIC DISCLOSURE

April 01, 2024

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

RE: Georgia Power Company's Coal Combustion Residuals Asset Retirement Obligation (CCR ARO) Semi-Annual Program Status Report; Docket No. 43083

Dear Ms. Tanner:

Enclosed for filing in compliance with the Georgia Public Service Commission's ("Commission") July 29, 2019, Order Adopting Stipulation as Amended in Docket No. 42310 ("2019 IRP Final Order") as well as the Commission's July 29, 2022, Order Adopting Stipulation in Docket No. 44160 ("2022 IRP Final Order") is Georgia Power Company's (the "Company") Semi-Annual CCR ARO Report ("Report"). The Company files this Report to update the Commission on the Company's CCR ARO compliance strategy activities through December 31, 2023 and other notable updates. Enclosed are the trade secret and public disclosure versions of the Report made in accordance with the Commission's Alternative Electronic Filing Procedures issued on March 17, 2020.

This filing contains certain information that is being filed under the Commission's trade secret rules as explained in the enclosed document regarding the basis for the assertion. If you have any questions, please call Cheryl Johnson at 404-506-6837.

Sincerely,

/s/ Kelley Balkcom
Kelley Balkcom
Director, Regulatory Affairs
Georgia Power Company

Enclosures

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

COAL COMBUSTION RESIDUALS
ASSET RETIREMENT OBLIGATION
SEMI-ANNUAL PROGRAM STATUS REPORT
DOCKET NO. 43083

GEORGIA POWER COMPANY

BASIS FOR THE ASSERTION THAT THE INFORMATION SUBMITTED IS A TRADE SECRET

In accordance with the order of the Georgia Public Service Commission, Georgia Power Company ("Georgia Power" or the "Company") hereby submits the Coal Combustion Residuals Asset Retirement Obligation ("CCR ARO") Program Semi-Annual Program Status Report ("Report") in Docket No. 43083. In the Report, the Company has submitted details related to its environmental compliance strategies, including projected and current cost estimates for CCR ARO ash pond closures and landfill projects (the "Information"), that constitute trade secret information of the Southern Company, Georgia Power, and its affiliates and is therefore protected from public disclosure under Commission Rule 515-3-1-11.

The Information derives 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 its disclosure or use. Specifically, the trade secret portions of the Information contain competitively sensitive details on the site specific and CCR unit specific costs the Company is expected to incur to close its ash ponds and landfills, the timing and issuance of future contracts, as well as the Company's expected investment in beneficial reuse projects. Publicly disclosing these costs would allow bidders and vendors to tailor proposals according to the Company's expected costs, setting an artificial floor on bidding, to the detriment and harm of the Company and its customers by not allowing the Company to conduct a proper solicitation and obtain the best cost estimates for future work. Disclosure of the Information could harm the Company and its customers in its efforts to obtain optimal pricing in current or future negotiations. In addition, the Company's competitors are not generally required to disclose similar information, and to require the Company to do so would put it at an economic disadvantage.

The Information is subject to extensive efforts to maintain its confidentiality. 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 of Georgia Power and Southern Company and their legal counsel are granted access to the Information, the party is required to sign a confidentiality agreement with respect to the Information.

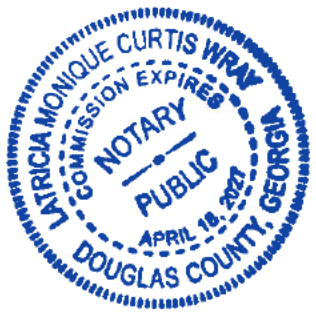
Robert W. Mitchell III, first being duly sworn, deposes and states that he has reviewed the Report and that, to the best of his knowledge, the specific information designated as trade secret therein constitutes trade secrets pursuant to Article 27, Chapter 1, Title 10 of the Georgia Code.

Robert W. Mitchell III
CCR PMO Director
Georgia Power Company

Subscribed and sworn to before me this 28 day of March, 2024.

Notary Public

My Commission expires:



Coal Combustion Residuals
Asset Retirement Obligation Program
Semi-Annual Program Status Report

Georgia Power Company

March 31, 2024

FORWARD-LOOKING STATEMENT CAUTIONARY NOTE

Certain information contained in this report is forward-looking information based on current expectations and plans that involve risks and uncertainties. Forward-looking information includes, among other things, statements concerning environmental regulations and related compliance plans and estimated expenditures. Georgia Power cautions that there are certain factors that can cause actual results to differ materially from the forward-looking information that has been provided. The reader is cautioned not to put undue reliance on this forward-looking information, which is not a guarantee of future performance and is subject to a number of uncertainties and other factors, many of which are not within the control of Georgia Power. Accordingly, there can be no assurance that such suggested results will be realized. The following factors, in addition to those discussed in Georgia Power's Annual Report on Form 10-K for the fiscal year ended December 31, 2023, and subsequent securities filings, could cause actual results to differ materially from management expectations as suggested by such forward-looking information: the impact of recent and future federal and state regulatory changes, including tax, environmental, and other laws and regulations to which Georgia Power is subject, as well as changes in application of existing laws and regulations; the extent and timing of costs and legal requirements related to coal combustion residuals; current and future litigation or regulatory investigations, proceedings, or inquiries; the ability to control costs and avoid cost and schedule overruns during the development, construction and operation of facilities or other projects; the ability to construct facilities in accordance with the requirements of permits and licenses and to satisfy any environmental performance standards and the requirements of tax credits and other incentives; advances in technology; state and federal rate regulations and the impact of pending and future rate cases and negotiations, including rate actions relating to cost recovery mechanisms; catastrophic events such as fires, earthquakes, explosions, floods, tornadoes, hurricanes and other storms, droughts, pandemic health events, political unrest, wars or other similar occurrences; and the effect of accounting pronouncements issued periodically by standard-setting bodies. Georgia Power expressly disclaims any obligation to update any forward-looking information.

Georgia Power Company
Coal Combustion Residuals Asset Retirement Obligation Program
Semi-Annual Program Status Report
March 31, 2024

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Georgia Power Company
Coal Combustion Residuals Asset Retirement Obligation Program
Semi-Annual Program Status Report
March 31, 2024

In accordance with the Georgia Public Service Commission's ("PSC" or the "Commission") Final Order in the 2019 Integrated Resource Plan ("IRP") proceeding in Docket No. 42310 and Final Order in the 2022 IRP proceeding in Docket No. 44160, Georgia Power Company ("Georgia Power", "GPC", or the "Company") provides this semi-annual report under the designated Docket No. 43083, regarding the Asset Retirement Obligations ("ARO") for its Coal Combustion Residuals ("CCR") compliance strategy activities through December 31, 2023 and other notable updates.

I. EXECUTIVE SUMMARY

Georgia Power is continuing progress on the ash pond ("AP") and CCR landfill ("LF") closure projects at locations across the state as detailed in Section III. Since the October 2023 Semi-Annual Report, the Company recognized the following key updates:

- *Permitting:* Georgia Environmental Protection Division ("EPD") continues to administer and enforce the requirements of state and federal CCR rules by issuing CCR permits, performing site inspections, and requiring groundwater monitoring and corrective action as applicable at all CCR units across the state. In November 2023, the EPD issued a final permit for Hammond AP-3, a closure-in-place unit. At Plant Hammond and all ash ponds across the state, the Company is utilizing proven engineering methods and technologies as part of customized, site-specific closure processes. The EPD's issuance of a final permit at Hammond AP-3 demonstrates the EPD's concurrence that the unit's closure plans meet the performance standards required by both state and federal CCR rules and are protective of the environment and the communities Georgia Power serves.

  Including the recently issued Hammond AP-3 permit, the EPD has issued 17 final permits for Georgia Power's ash ponds and landfills. The Company remains committed to working with Georgia EPD on the issuance of the remaining CCR permits while EPD and the Environmental Protection Agency ("EPA") continue to discuss existing and future permits. Most recently, EPA issued EPD a letter questioning the issuance of the final permit for Hammond AP-3 and requested continued communication on permit issuances. The Company continues to plan and sequence work strategically to ensure closure progress continues as required in an efficient manner, consistent with recognized and generally accepted good engineering practices, while also

adjusting the schedule for certain activities to mitigate risk where possible. Further permitting details are discussed in Section II.

- *Landfill Expansions:* The Company is continuing the permitting process to expand both the Plant Hammond Huffaker Road Landfill and the Plant Wansley Landfill for additional disposal capacity. This additional capacity is necessary to support ash pond closure efforts at each facility and maximizes the use of the existing landfill assets at each site. Streambank mitigation credits have been obtained for area impacts as part of this expansion progress. Further permitting details are discussed in Section II.

  At Plant Bowen, construction is ongoing to expand Plant Bowen's landfill to support the ash pond closure and to further facilitate the beneficial use of harvested ash. Further details on beneficial use project progress are discussed in Section IV.

- *Beneficial Use*: Beneficial use efforts continue at Georgia Power facilities including Plants Bowen, Branch, and Mitchell. Infrastructure development for the beneficial use facility is ongoing at Plant Branch and the project schedule has been revised to incorporate beneficial use. At Plant Bowen, construction is complete and commercial operations began on March 19, 2024. Additionally at Plant Bowen, contracting has been finalized for design and procurement for a conveyance system to support beneficial use and closure activities. At Plant Mitchell, the Company has continued to work with the onsite contractor to expand rail and truck transportation opportunities as well as to pursue additional end-users of the ash. The benefits of this engagement have been demonstrated with increased production throughout 2023.

  This beneficial use of ash is expected to reduce long-term liability with less ash to be stored in ash ponds and landfills and is expected to produce ash sales to offset some of the ash pond closure costs. Up to nineteen million tons of ash are anticipated to be harvested, processed, and removed from sites throughout the multi-year closure timeframe. The Company will continue to look for additional opportunities to incorporate beneficial use and will update the Commission on any beneficial use program progress in future CCR ARO Semi-Annual Program Status Reports. Further details on beneficial use project progress are discussed in Section IV.

The Company continues to make progress on its CCR program with a continued focus on safety excellence. The progress spans across many areas including construction,

engineering, permitting, groundwater monitoring and reporting, remedy selection and corrective action, dewatering, and post-closure care.

In May 2023, the EPA published a proposed rule on Legacy CCR Surface Impoundments to establish two new categories of federally regulated CCR: legacy surface impoundments and CCR management units. Notably, of the three states that currently operate EPA-approved state permitting programs, Georgia's State Rule regulates CCR units that would meet EPA's proposed legacy impoundment definition. EPA's proposal could create duplicative regulation for those units. Further, the proposal would subject all facilities to perform assessments at each site to identify a new classification of units, referred to as CCR management units. A final rule is anticipated from the EPA in 2024. The Company will continue to follow the development of this regulation and provides additional details in the 2024 Environmental Compliance Strategy ("ECS") Report.

This report provides updates to project schedules and estimated closure construction timelines for ash ponds and landfills in Section V and Appendix B. Estimated closure completion timelines are indicative of aggressive targets and future risks or opportunities could cause these estimated timeframes to shift. The Company will continue to update project schedules as each project progresses.

Georgia Power's current cost estimate applicable to retail customers for the CCR ARO program over the coming decades is approximately $7.4 billion, including approximately $1.4 billion in actual costs previously incurred. As further outlined in Section VI of this report, there has been an approximately $370 million decrease in the Company's total retail estimate at completion ("EAC") compared to the October 2023 Semi-Annual Report due to the remaining application of lower expected future escalation rates to all projects in the portfolio. These forecasted interest rates are applied based on generally accepted accounting principle requirements for AROs. In summary, several market factors contributed to an expectation of deflationary pressure in the short term, and lower rates over the long term, compared to previous interest rate forecasts. These trends were reflected in the sites which administered a third quarter 2023 CCR ARO liability revision, as described in the Company's October 2023 Semi-Annual Report, and have now been applied to all sites in the program. Georgia Power will continue to monitor cost, schedule, risk, and change forecasts, and provide updates in the future.

Georgia Power's Environmental Compliance Strategy

The Company provides updates on the CCR ARO compliance strategy through its ECS updates. Implementation progress is reported semi-annually in the CCR ARO Program Reports. The Company also posts compliance-related information on the Company's external website. Per the 2022 IRP Final Order (Docket No. 44160), any determination by the EPD causing a change in closure strategy for ash ponds closing in place requires the Company to notify the PSC within 30 days of such determination. During this reporting period there has been no such determination requiring a change in closure strategy.

The following table summarizes the Company's PSC-approved closure strategy for its ash ponds and CCR landfills:

Table 1. Georgia Power's Ash Ponds and Existing CCR Landfills ("CCR Units")

	Ash Pond Closure Method			Existing CCR Landfills
	Closure by Removal	Closure in Place	Total	
Arkwright				**3**
Bowen		1	**1**	**1**
Branch	5		**5**	
Hammond	3	1	**4**	**1**
Kraft	1		**1**	**1**
McDonough	1	3	**4**	
McIntosh	1		**1**	**2**
McManus	1		**1**	
Mitchell	3		**3**	
Scherer		1	**1**	**1**
Wansley	1		**1**	**1**
Yates	4	3	**7**	**2**
	20	9	**29**	**12**

II. PERMITTING

In compliance with Georgia's CCR Rule, and as further discussed in detail in the Company's ECS filings since 2019, initial permit applications for all existing CCR units were submitted to the EPD in late 2018. The permit documents submitted to the EPD include voluminous amounts of compliance information, as it relates to inspections, design criteria, engineering calculations, operating criteria, groundwater monitoring, closure plans, post-closure plans, quality control, and other required information.

Figure 1: Final Permit Issuance To Date

2018	2020	2021	2022	2023
Initial Permit Applications Submitted	McIntosh AP-1 Hammond AP-1 Hammond AP-2	Hammond AP-4 McManus AP-1	Yates AP-1 Yates Gypsum LF **Bowen AP-1** Mitchell AP-A/AP-1/AP-2 Bowen LF Wansley LF	Branch LF McIntosh LF 3 McIntosh LF 4 Scherer LF Yates AP-2 **Hammond AP-3**

*Note: CCR Units in **bold** denote a final permit issued for a closure-in-place unit*

Since the October 2023 Semi-Annual Report, a final permit for Hammond AP-3 was issued by EPD, for a total of 17 final permits issued to date. As part of the permitting process, the EPD reviews and provides comments to Georgia Power on the site-specific details of the individual permit applications. The Company has taken steps to address the EPD's comments, which included working with third-party engineering firms to update groundwater monitoring plans, revise permit documents and update closure drawings and engineering calculations. However, while the EPD required the Company to update its permit applications and plans, final permits have been largely consistent with the original permit applications and did not significantly change the Company's closure plans.

EPD permitting activities for the remaining projects are currently expected to continue for the next several years. The Company continues to respond to the EPD's requests for information and to address comments for the remaining permit applications under review.

As discussed in the previous reports, the change in closure strategy at Plant Wansley necessitated an expansion of the onsite landfill; permitting is ongoing for that expansion. The Company is also in the process of permitting an expansion of Huffaker Road, the Company-owned off-site permitted CCR landfill near Plant Hammond. The process for

permitting these landfill expansions was initiated in 2023 and is ongoing. Streambank mitigation credits have been obtained in 2023 for area impacts of each landfill expansion. Additional streambank mitigation credits are expected to be obtained for Huffaker Road in 2024.

In December 2022, Georgia Power entered into a consent agreement with the EPD, recognizing the need to extend the closure timeline for McDonough AP-1. Consistent with CCR rules, a Notification of Intent to Initiate Closure was filed in December 2015. Additionally, and in accordance with CCR rules, an extension request for two years was submitted to the EPD in December 2020 that re-established the closure deadline to December 2022. While much of the closure is complete, design and regulatory review of the remaining activities by the EPD are ongoing. EPD, recognizing these factors are beyond the Company's control, issued the consent order to provide additional time to complete the closure while finalizing permitting. The consent order requires a milestone schedule, which was submitted to and approved by the EPD in 2023. There was no monetary penalty associated with the consent order.

Through the permitting process, solar generation is also continuing to be evaluated for CCR units. With the Commission's approval in the 2016 IRP (Docket No. 40161) for ash pond solar demonstration projects, options for future solar development are currently included in the McIntosh AP-1 final permit design, the Hammond AP-3 final permit design, and the updated McDonough AP-2, AP-3, AP-4 permit application for the combined AP-3/4 CCR unit. Installation of the solar project at McIntosh AP-1 began in 2023 and is estimated to be completed in 2024. The other installations are planned to be initiated after approval by the EPD in the permitting process and once closure construction of the CCR units has been completed. Additionally, a solar pilot continues at McDonough AP-3/4.

III. PROJECT UPDATES

Activity Overview

Georgia Power's CCR permit applications include site-specific closure plans for each ash pond or CCR landfill project. In order to advance the program, and for the projects to comply with the deadlines in the CCR rules, the Company has progressed design and engineering efforts, construction activities, permitting, groundwater monitoring and reporting, and dewatering activities.

Safety

As closure construction has progressed, Georgia Power has continued to instill a culture of safety excellence on all sites. Over 1.2 million safe work hours were performed in 2023, with a cumulative program total of 5.2 million safe work hours without significant injury, as defined by Edison Electric Institute.

Dewatering and Water Treatment

The Company's dewatering process during ash pond closures involves treating all contact water to meet the requirements of each plant's wastewater permit, as well as the associated dewatering plans approved by the EPD, to ensure compliance with water quality standards. As of December 2023, the Company is continuing dewatering operations at six plants in accordance with the EPD-approved dewatering plans: Plants Bowen, Branch, Hammond, McDonough, Mitchell, and Yates. In 2023, EPD approved Plant Scherer's ash pond dewatering plan. Dewatering activities at Plant Scherer began in early March 2024, upon the completion of wastewater treatment construction and commissioning activities. As a result of the PSC-approved Wansley ash pond strategy change to closure by removal, Plant Wansley is expected to commence dewatering in fourth quarter of 2024, in accordance with their EPD-approved dewatering plan.

The dewatering activities occur under the direction of independent, third-party licensed wastewater treatment plant operators throughout the duration of each closure project. In 2023, independent wastewater treatment contractors treated approximately 937 million gallons of water and independent sampling contractors conducted over 500 sampling events for the effluent and receiving streams, bringing program totals to over 4.37 billion gallons of water treated and over 2,750 sampling events for the effluent and receiving streams. Water quality monitoring data is reported monthly to the EPD and a monthly summary is also placed on Georgia Power's external website. In some cases, water treatment may continue into the post-closure care ("PCC") period to manage ongoing

water treatment requirements. This support will continue until the needs of the sites are addressed. In addition, the Company has engaged independent, third-party contractors for weekly effluent and bi-monthly receiving stream sampling throughout dewatering. Samples collected by independent contractors are analyzed by accredited independent laboratories.

The dewatering process is dynamic and complex. The treatment system demands are often impacted by rainfall and site-specific closure conditions. For these reasons, the required treatment technologies may be different at each site and may change during the closure process to support the needs of the site, which may cause labor resources, operating schedules, and associated costs to fluctuate. The Company will adjust the individual site water treatment infrastructure to align with site needs and regulatory requirements during closure and post-closure as required.

Groundwater

Georgia Power continues to monitor groundwater at its ash ponds and CCR landfills and to report the results to the EPD, as well as to post regular updates to the Company's external website. Georgia Power has installed comprehensive groundwater monitoring networks, including more than 600 wells, at its facilities across the state to actively monitor groundwater quality at each site.

As required under the CCR rules, the Company continues to perform routine sampling and reporting for the compliance parameters listed in the rules. Between January and December 2023, 66 additional groundwater wells and piezometers were installed, more than 1,750 groundwater samples were collected from all the wells, and the results were included in 73 groundwater reports submitted to the EPD and posted to Georgia Power’s external website. Where parameters have been observed at statistical levels above the groundwater protection standard (“GWPS”), the Company has completed evaluations and, when necessary, entered into assessment of corrective measures (“ACM”).

As required under the CCR rules, the Company has installed additional monitoring wells to further characterize groundwater quality near CCR units in ACM. As the Company continues the ACM process, prior to implementing a corrective measure or remedy, the Company will conduct additional activities such as continued site characterization (including groundwater sampling, well and piezometer installation, and laboratory bench scale testing), remedy selection, and reporting to the EPD.

Draft remedy selection reports for Bowen AP-1; McManus AP-1; McDonough AP-1; McDonough AP-2, AP-3, AP-4; and Grumman Road Landfill were submitted to the EPD in 2023. Draft remedy selection reports for two Arkwright landfills were submitted in the

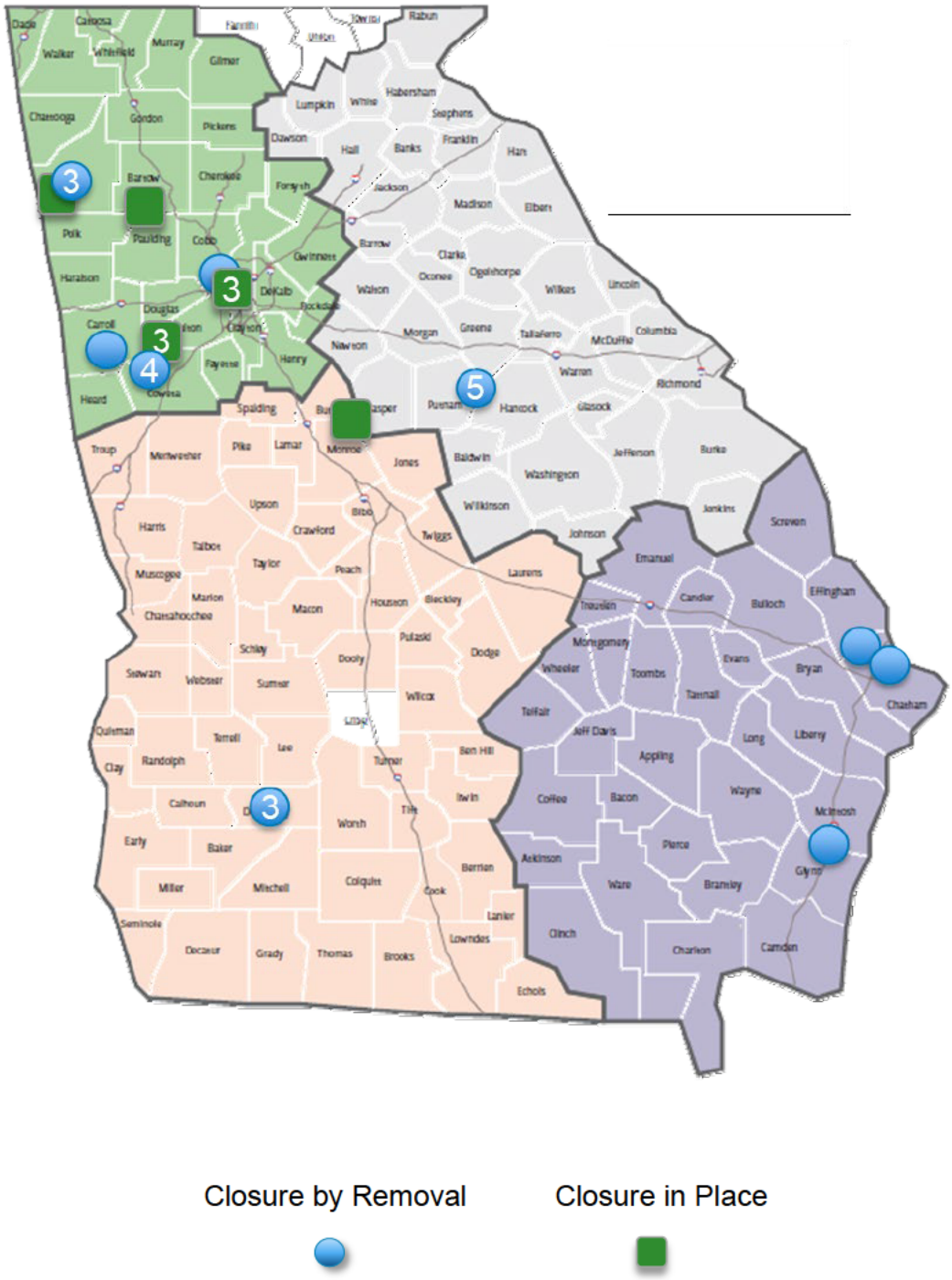
first quarter of 2024. The reports signify the next step in the regulatory process towards selecting a remedy to address substances in groundwater above the GWPS. The reports were prepared by independent engineers and geologists and contain site-specific data that is used to evaluate corrective measures and to select a proposed remedy for the EPD to review and approve. Third-party, independent consultants will continue routine groundwater sampling, data evaluation, interpretation, and reporting while accredited independent laboratories will continue performing analyses following the appropriate methodology and protocols.

EPD has provided comments on the draft remedy selection reports for Hammond AP-1, Hammond AP-2 and Yates AP-3/AP-B' and R6 that the Company submitted in 2022, authorizing further testing in support of remedy selection. EPD-approved pilot testing of the potential remedy at Plant Hammond is underway. In the first quarter of 2024, EPD approved the submittal of a pilot study workplan for Plant McManus AP-1. A pilot study notification form and workplan will be prepared and submitted to the EPD in the second quarter of 2024. Following further data evaluation and EPD concurrence with the proposed remedies, the next step in this process is hosting a public meeting to solicit public comments on the proposed remedy, as required by the Federal CCR Rule.

Ash Pond Closure Progress

Georgia Power has 29 ash ponds at 11 sites.

Figure 2: Ash Pond Closure Locations



Construction Activities

The Company has continued making closure construction progress at its ash ponds across Georgia. Closure activities include dewatering, site preparation, ash excavation, ash consolidation/placement, installation of closure cover systems, installation of engineering controls, and site restoration. Pre-construction activities include engineering studies, design, closure evaluations, constructability reviews, and other early site preparation work (contractor mobilization, setup of temporary facilities, laydown area construction, stormwater controls installation, etc.). The Company must continue work on these closures to meet the requirements in the Federal and Georgia CCR Rules, with ash pond closure deadlines provided by regulation or agreement with the EPD. Consistent with past practice, the Company plans and sequences work strategically to ensure closure progress continues as required in the shortest amount of time consistent with recognized and generally accepted good engineering practices, while also adjusting the schedule for certain activities to mitigate risk where possible.

A summary of construction status for these ponds is listed in Table 2 below. Closure strategies for each ash pond are designated as closure in place ("CIP") or closure by removal ("CBR"). The interim post-closure care ("IPCC") activities occur prior to PCC during the time period following closure construction, while closure certification reports are being finalized and approved by the EPD and permits are being issued for those projects that have yet to receive a final permit. PCC includes activities that extend beyond closure or closure construction, including groundwater monitoring, water management, general site maintenance, and other compliance activities following IPCC. This category encompasses both post-closure for a closure-in-place project and post-closure construction ("PCC – Post Removal") for a closure-by-removal project. Ash ponds are grouped in the table below in accordance with the permit application submitted for the closure.

Table 2. Ash Pond Construction Progress

	Closure Strategy	Construction Status	Dewatering Status
Construction Complete			
Branch AP-A	CBR	Previously Removed	Previously Removed
• CCR was previously removed from the 1-acre ash pond and consolidated within AP-E before the Georgia CCR Rule became effective. A certification of removal report has been filed with the EPD.			

	Closure Strategy	Construction Status	Dewatering Status
Hammond AP-3	CIP	IPCC	Completed
• AP-3 has been closed in place. CCR within the 25-acre footprint was graded to drain and an impermeable cover system that includes a geomembrane was installed over the final footprint. A final closure certification has been filed with the EPD. Consistent with the post-closure plan, an engineering measure consisting of a TreeWell® system is planned outside and downgradient of the CCR footprint of AP-3. The system utilizes specialized lined planting units constructed with optimum planting media designed to promote downward root growth and focus groundwater extraction from a targeted depth interval. EPD issued a final permit for Hammond AP-3 in November 2023.			
Kraft AP-1	CBR	Previously Removed	Previously Removed
• CCR was previously removed from the 7-acre ash pond to off-site permitted landfills before the Georgia CCR Rule became effective. Additionally, the removal was part of an expanded plant retirement project and was regulated by the EPD's Response and Remediation Program. Georgia Power submitted a certification of removal report for AP-1 to the EPD in 2018 as part of a site-wide Compliance Status Report. The EPD provided concurrence with the Compliance Status Report in June 2020 and delisted the site from the EPD's Hazardous Site Inventory in 2021.			
McIntosh AP-1	CBR	PCC – Post-Removal	Completed
• CCR was removed from the 22-acre ash pond and placed in Landfill No. 4, an onsite permitted CCR landfill. A certification of removal report has been submitted to and acknowledged by the EPD.			
McManus AP-1	CBR	PCC – Post-Removal	Completed
• CCR was removed from the 82-acre ash pond and placed in an off-site permitted landfill. A certification of removal report has been submitted to and acknowledged by the EPD.			
Yates AP-1	CBR	PCC – Post-Removal	N/A
• CCR was removed from the 30-acre ash pond and consolidated in R6, an onsite permitted CCR landfill, as well as consolidated into AP-B' and AP-3. A certification of removal report and a separate certification statement detailing completion of closure and decontamination to meet the federal requirements of 40 C.F.R. § 257.102(f)(3) have been submitted to and acknowledged by the EPD.			

Construction Underway or Significantly Completed			
	Closure Strategy	**Construction Status**	**Dewatering Status**
Bowen AP-1	CIP	In Closure	Ongoing
• Closure construction is ongoing on the 254-acre ash pond. Infrastructure construction to process ash for beneficial use is complete and commercial operations began on March 19, 2024. Additionally, a conveyor system is being designed for installation to further accommodate ash beneficiation and closure.			
Hammond AP-1	CBR	In Closure	Ongoing
• Closure construction is ongoing for the 35-acre ash pond. Work is continuing with the removal of CCR from AP-1 to Huffaker Road, the Company-owned off-site permitted CCR landfill.			
Hammond AP-2	CBR	In Closure	Ongoing
• Closure construction is ongoing for the 21-acre ash pond. Ash excavation from AP-2 to Huffaker Road, the Company-owned off-site permitted CCR landfill, is near complete.			
McDonough AP-1	CIP	In Closure	N/A
• Closure construction is ongoing on the 25-acre ash pond. Installation of the geosynthetic cap cover system is complete. Consistent with the closure plans, an engineering measure consisting of a barrier wall is planned for the unit. Pre-construction work associated with the installation of the barrier wall is ongoing, as the EPD continues its review of engineering plans for the barrier wall.			
McDonough AP-2, AP-3, AP-4	AP-2: CBR AP-3/4: CIP	In Closure	Ongoing
• AP-2: CCR was removed from the 7-acre ash pond and consolidated into AP-1, AP-3, and AP-4. A certification of removal report has been submitted to and acknowledged by the EPD. Site restoration is complete. • AP-3/4: Closure construction activities are near complete with the consolidation of CCR from a combined ash pond area of 79-acres to a smaller footprint and the installation of a cover system that includes a geomembrane to cover the final footprint. Consistent with the closure plans, engineering measures implemented in closure construction include an under-slope drainage system and the continued interim use of dewatering wells. • Final stages of CCR movement will be underway in 2024.			

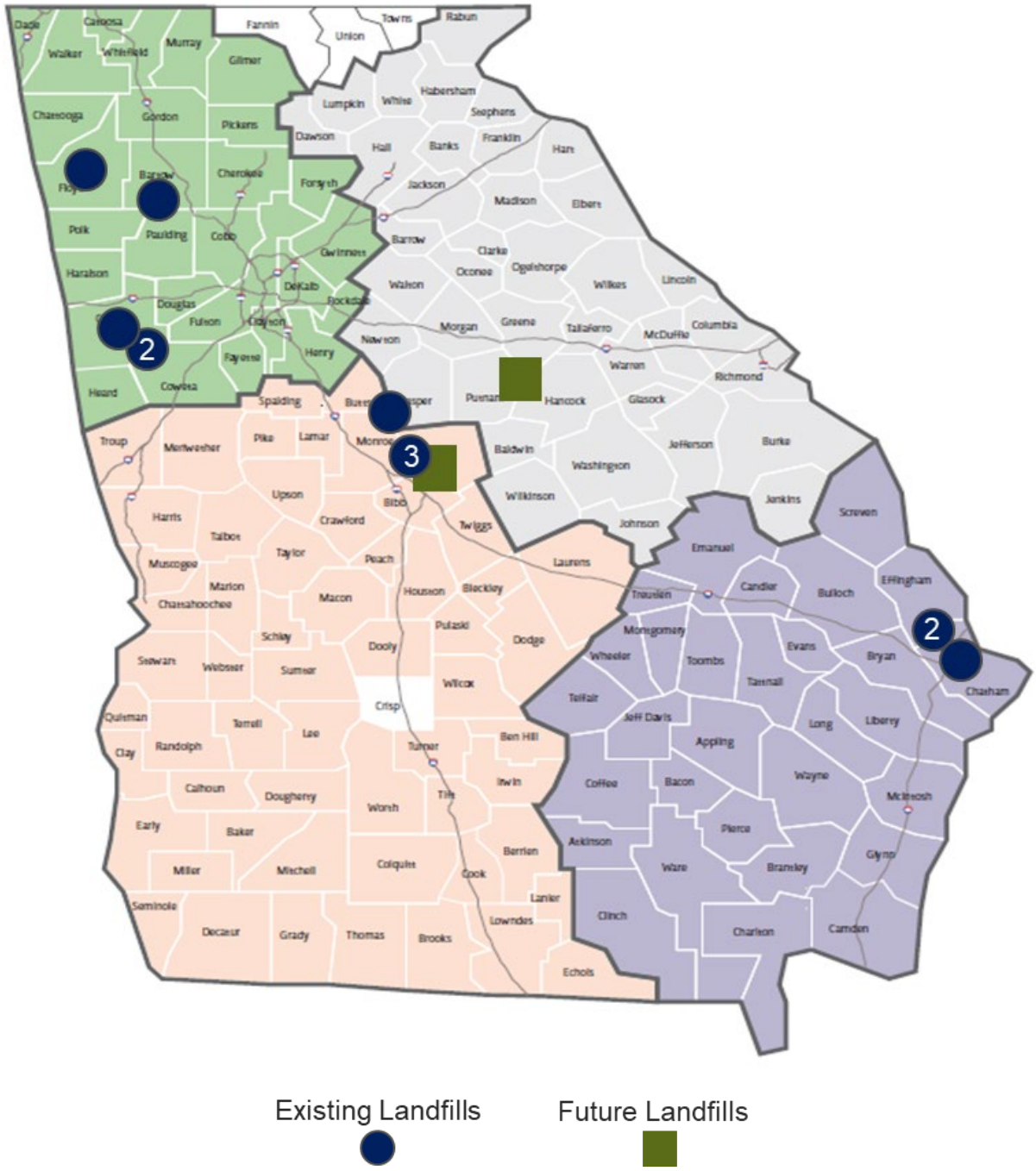
	Closure Strategy	Construction Status	Dewatering Status
Mitchell AP-1, AP-2, AP-A	CBR	In Closure	Ongoing
• CCR removal from the combined ash pond area of 104-acres is ongoing. CCR is continuing to be transported off-site for beneficial use. CCR that does not meet beneficial use material specifications, mixtures of soil and CCR, organic debris, and other CCR contact material continue to be sent to an offsite, permitted landfill.			
Yates AP-2	CBR	PCC – Post Removal	Ongoing
• CCR has been removed from the 60-acre ash pond and consolidated within the AP-3 and AP-B' footprint, which is being closed in place. A certification of removal report was submitted to EPD in 2023 and was acknowledged by the EPD in the first quarter of 2024. Site restoration is ongoing.			
Yates AP-A, AP-B, AP-B', AP-3	AP-A/AP-B: CBR AP-3/AP-B': CIP	In Closure	Ongoing
• CCR from other ponds at Plant Yates, including AP-A (24-acres) and AP-B (6-acres), is continuing to be consolidated within the footprint of the combined AP-3 and AP-B' pond, making up the Ash Management Area ("AMA"). Installation of a cap cover system (which includes a geomembrane) is underway and will ultimately cover the consolidated AP-3/AP-B' footprint of 88.5-acres upon completion. Consistent with the closure plans, an engineering measure consisting of a subsurface hydraulic conveyance system has been incorporated into the closure construction plans. A certification of removal report for AP-A has been submitted to and acknowledged by the EPD. Site restoration is ongoing.			
Yates AP-C	CIP	In Closure	N/A
• The former ash pond was previously incorporated into the onsite permitted CCR landfill, R6.			
<u>Pre-Construction</u>			
Branch AP-B, AP-C, AP-D	CBR	Pre-Construction	Ongoing
• Design has been finalized and the construction of the onsite permitted landfill is ongoing. Dewatering and early site preparation activities, such as establishing surface water drainage features and vegetation clearing, are underway on the combined ash pond area of 167-acres. Infrastructure development to accommodate ash beneficiation is underway.			

	Closure Strategy	Construction Status	Dewatering Status
Branch AP-E	CBR	Pre-Construction	Ongoing
• Design has been finalized and the construction of the onsite permitted landfill is ongoing. Dewatering and early site preparation activities, such as establishing surface water drainage features and vegetation clearing, are underway on the 348-acre ash pond. Infrastructure development to accommodate ash beneficiation is underway.			
Hammond AP-4	CBR	Pre-Construction	Ongoing
• The Company is continuing to progress the closure design package. AP-4 (54-acres) will be closed by removal to a Company-owned off-site permitted CCR landfill (Huffaker Road).			
Scherer AP-1	CIP	Pre-Construction	Ongoing
• Design has been finalized and the constructability review is complete. The bid process for the initial phases of work is ongoing. Early site preparation activities are complete on the 550-acre ash pond. Consistent with the closure plans, closure construction includes consolidation of the current footprint and closure of the pond with an engineering measure to extend the final cover system over non-CCR containing areas to minimize stormwater infiltration. Dewatering began in early March 2024, in accordance with the EPD-approved dewatering plan.			
Wansley AP-1	CBR	Pre-Construction	Dewatering Plan Approved
• As per the Commission's approval of the Company's 2022 IRP (Docket No. 44160), the closure method for Wansley AP-1 changed to closure by removal to the onsite landfill. The prime contractor has been selected through a competitive request for proposals ("RFP") process and will provide constructability inputs to support the closure-by-removal detailed design. Construction is anticipated to start once the design is complete. The revised permit application was submitted to EPD in 2023; permitting activities are ongoing. Early site preparation activities are complete on the 343-acre ash pond.			

CCR Landfills

Georgia Power has 12 existing CCR landfills and 2 future CCR landfills planned, which will be permitted and constructed to support closures into the future.

Figure 3: CCR Landfill Locations



CCR Landfill Activities

Georgia Power is complying with federal and state requirements at its 12 existing CCR landfills. Five of the 12 landfills either support current plant operations or ash pond closure projects and are actively operated under CCR Permits or existing Solid Waste Permits. The remaining seven existing landfills are closed or undergoing closure under CCR Permits or existing Solid Waste Permits. As part of the overall scope of the closure projects, Georgia Power is in the process of permitting and constructing two future onsite CCR landfills to support closures, as approved in the 2019 and 2022 IRP (Docket No. 42310 and 44160, respectively). Consistent with the Georgia CCR Rule, seven updated landfill permits have been received to date.

Table 3: CCR Landfill Activities

	Landfill Status
Existing CCR Landfills	
Arkwright	Pre-Construction
• 3 CCR landfills closed in 2010 under Solid Waste Regulations applicable at the time of closure. Under the new Georgia CCR Rule, the CCR units will be removed and consolidated into a future onsite permitted CCR landfill. Site restoration will be completed following CCR removal. Maintenance activities to improve access around AP-1 and prepare for final closure construction are ongoing and are anticipated to be completed in early 2024.	
Bowen Landfill	Operational for Generation / Under Development for Ash Pond Closure
• Certain cells in the CCR landfill are to remain active as part of ongoing plant operations and to support ash pond closure. In support of the ash pond closure, construction of Cells 5 and 6 is currently underway. The landfill will undergo closure when permitted capacity is reached or when CCR disposal is no longer needed.	
Hammond Huffaker Road Landfill	Operational for Closure
• CCR landfill is to be closed when permitted capacity is reached or when CCR disposal is no longer needed. The Company submitted a Site Acceptability Report to the EPD in 2023 to initiate the landfill expansion permitting process. As part of the landfill expansion, the Company obtained streambank mitigation credits in 2023 and expects to obtain additional streambank mitigation credits in 2024.	
Kraft Grumman Road Landfill	IPCC
• The cap cover system has been installed and construction certification documents have been filed with the EPD. Site restoration and maintenance activities are ongoing.	

	Landfill Status
McIntosh Landfill No. 3	PCC
• CCR Landfill No. 3 is closed.	
McIntosh Landfill No. 4	IPCC
• CCR Landfill No. 4 Cells 1 and 2A are currently in IPCC. EPD has acknowledged interim cover installation on CCR Landfill No. 4 Cell 2A, which was installed following the completion of ash pond closure activities. EPD has approved a minor permit modification request for a two-year extension to initiate final closure of Landfill No. 4. This modification allows Landfill No. 4 to remain available for up to two years.	
Scherer Landfill	Operational for Generation
• CCR landfill to remain active as part of ongoing plant operations. The landfill will undergo closure when permitted capacity is reached or when CCR disposal is no longer needed.	
Wansley Landfill	Operational for Closure
• Following the Commission's 2022 approval of the retirement of Plant Wansley Units 1 and 2, the Company will utilize the existing onsite landfill for storage of CCR removed from AP-1. The landfill will then be closed following placement of CCR. The Company submitted a Site Acceptability Report to the EPD in 2023 to initiate the landfill expansion permitting process. As part of the landfill expansion, the Company purchased streambank mitigation credits in 2023.	
Yates Gypsum Stack Landfill	PCC – Post-Removal
• The Gypsum Landfill has been removed. A certification of removal report has been submitted to and acknowledged by the EPD.	
Yates R6 Landfill	In Closure
• Former ash pond AP-C was previously incorporated into the onsite permitted CCR landfill, R6. R6 is currently being closed. Site restoration and maintenance is ongoing.	

	Landfill Status
Future CCR Landfills	
Arkwright Landfill	Future
• Existing onsite permitted landfills will be consolidated into the future CCR landfill. Permitting activities are ongoing.	
Branch Landfill	Under Construction
• Future CCR landfill will receive CCR from the removal of ash ponds. Construction of initial landfill cells is ongoing.	

IV. BENEFICIAL USE

Georgia Power's ECS (Docket No. 44160) describes the Company's beneficial use efforts focused on the following categories: beneficial use of production CCR, new research and technology associated with beneficial use, and beneficial use of stored ash at the Company's ash ponds and CCR landfills. Additional discussion is included below.

Beneficial Use of Production CCR

Georgia Power has marketed, over a five-year average, more than 85 percent of the CCR generated from plant operations for beneficial use, which helps to minimize or offset costs related to CCR storage, landfill construction, and associated operation and maintenance costs. The beneficial use of production CCR, both costs and sale proceeds, are applied to the Company's operation and maintenance account.

Research and Technology

The Company, in partnership with Electric Power Research Institute and other utilities across the industry, has developed a center for beneficial use of harvested CCR, located at Plant Bowen. The Ash Beneficial Use Center strives to develop additional beneficial uses and better technologies to process harvested ash for beneficial use. The Company continues to develop and explore research and beneficial use development opportunities as approved and further detailed in the 2019 and 2022 IRP (Docket No. 42310 and 44160, respectively).

Beneficial Use of Stored Ash at the Facility Level

Georgia Power is working to actively identify opportunities to maximize the value for the beneficial use of stored coal ash at its active and retired plants across the state. The costs and benefits associated with beneficial use of stored coal ash are included in the CCR ARO forecasted amounts in this report. Relevant updates are included below:

Plant Mitchell

The Company is continuing with plans to remove the stored coal ash at Plant Mitchell's three ash ponds for beneficial use. Over the next several years, up to approximately two million tons of ash are planned to be removed from the site to help create Portland cement, which is used to make concrete. These beneficial use plans will reduce the amount of ash required to be removed to an off-site landfill and ultimately serve to produce

a valuable product. Through December 2023, approximately 680,000 tons of ash have been removed from the site for this purpose.

Progress early in the project was moderated by transportation logistics and the ability of end-users to receive and process the ash for beneficial use. The Company has continued to work with the onsite contractor to expand rail and truck transportation opportunities as well as to pursue additional end-users of the ash. The benefits of this engagement have been demonstrated with increased production throughout the year. The Company will continue to work with the onsite contractor to manage the potential for future challenges with end-users, supply chain, transportation, and other project factors that may arise in order to keep the project successfully moving forward.

Ash Beneficial Use Request for Proposals

In December 2019, the Company initiated an RFP to support the beneficial use of stored coal ash at Georgia Power facilities (as further detailed in the 2023 ECS in Docket No. 44160). Based on information received through the RFP, for certain facilities (Plants Bowen and Branch), there is an opportunity to incorporate ash beneficial use throughout the multi-year closure timeframe, with the potential to reduce long-term liability and return a net positive benefit for customers. As of September 2023, after the award of contracts at Plants Bowen and Branch, the Company has completed the beneficial use RFP process. In accordance with the 2022 IRP Final Order (Docket No. 44160), the Company has provided a report to the Commission on the results of the beneficial use RFP.

As discussed in the 2022 IRP (Docket No. 44160) and updated in the Company's 2023 report on the beneficial use RFP, in order to take advantage of the overall expected benefits associated with the beneficial use contract and access the high value ready-mix concrete market, the Company will need to make near-term investments. These investments are expected to benefit the CCR ARO program by providing downward pressure on the overall ash pond closure project costs. These benefits could take the form of reduced ash volumes handled during closure, reduced final footprint needed to support closure, and/or reduced post-closure care cost. Additionally, the value of the ash sales can further offset closure costs. The Company will continue to look for additional opportunities to incorporate beneficial use and will update the Commission on any beneficial use program progress in future CCR ARO Semi-Annual Program Status Reports.

Plant Bowen

Through the aforementioned RFP, the Company awarded a contract in 2022 to support beneficial use efforts as part of Plant Bowen's ash pond closure project. Infrastructure construction for the new beneficial use facility at Plant Bowen is complete and commercial operations began on March 19, 2024. Contracting has been finalized for design and procurement for a conveyance system to support beneficial use efforts at Plant Bowen. Transportation of harvested ash from Plant Bowen for use in the ready-mix concrete market is expected to begin in 2024, with approximately nine million tons of ash anticipated to be harvested, processed, and removed from the site over the duration of the project.

Plant Branch

Through the same extensive RFP process, the Company additionally signed a contract in 2023 to support beneficial use efforts as part of Plant Branch's ash pond closure projects. Due to the specific characteristics of the ash at Plant Branch, the ash will be dried for beneficial use and further thermally processed to meet the quality standards of the ready-mix concrete market. Infrastructure development at Plant Branch has begun. Transportation of beneficiated ash from Plant Branch is expected to begin in 2026. Approximately eight million tons of ash are anticipated to be harvested, processed, and removed from site over the 15-year contract. The closure schedule for the ash ponds and onsite landfill has been revised to incorporate the 15 years of harvested ash sales.

V. SCHEDULE SUMMARY

Estimated closure construction timeframes vary by location and are site-specific. Estimated ash pond timeframes can be influenced by numerous factors, including, but not limited to, state and federal regulatory actions and rule amendments, legislative action, necessary scope changes, weather, final ash quantities, beneficial use market trends, contractor productivity, and other market and external factors. Factors that affect landfill estimated timeframes include status of plant operations, unit capacity factors, available landfill capacity, and whether the landfill is designated to support ash pond closure activities. Landfill closure dates at coal generating plants are significantly influenced by generation output and how much operational ash is sold for beneficial use and not disposed of in the onsite landfill. Estimated closure completion timelines are indicative of aggressive targets and future risks or opportunities could cause these estimated timeframes to shift. The Company will continue to update project schedules as each project progresses.

Below are summaries of the estimated closure construction timeframes for ash ponds and landfills. Schedule summaries in Gannt chart format can be found in Appendix B.

Ash Pond Estimated Closure Construction Timeframes

Table 4. Ash Pond Estimated Closure Construction Timeframes

	Closure by Removal	Closure in Place	Total	Estimated Closure Construction Completion[1]
Bowen		1	**1**	**2034**
Branch	5		**5**	**2041**
Hammond	3	1	**4**	**2032**
Kraft	1		**1**	**2016** [A]
McDonough	1	3	**4**	**2025**
McIntosh	1		**1**	**2022** [A]
McManus	1		**1**	**2020** [A]
Mitchell	3		**3**	**2030**
Scherer		1	**1**	**2033**
Wansley	1		**1**	**2034**
Yates	5	2	**7**	**2024**
	20	9	**29**	

[1] For those sites with multiple ash ponds, the date above reflects the last pond's estimated closure construction completion date for the site in total. The "Estimated Closure Construction Completion" date reflects the estimated end of closure construction and estimated completion of major restoration activities that may go beyond the submittal of the Closure Certification Report or the Certification of Removal Report.
[A] Denotes actual closure construction completion date.

Landfill Estimated Closure Construction Timeframes

Table 5. Landfill Estimated Closure Construction Timeframes

	Existing CCR Landfills	Future, New Permitted Landfills	Total	Estimated Closure Construction Completion[1]
Arkwright	3	1	**4**	**2032**
Bowen	1		**1**	**2039**
Branch		1	**1**	**2041**
Hammond	1		**1**	**2032**
Kraft	1		**1**	**2020** [A]
McIntosh	2		**2**	**2022** [2]
Scherer	1		**1**	**2046**
Wansley	1		**1**	**2034**
Yates	2		**2**	**2024**
	12	2	**14**	

[1] For those sites with multiple landfills or landfill cells, the date above reflects the last cell's estimated closure construction completion date for the site. The "Estimated Closure Construction Completion" date reflects the estimated end of closure construction and estimated completion of major restoration activities, which may go beyond the submittal of the Closure Certification Report or the Certification of Removal Report.

[2] In 2023, a request was approved by the EPD to extend the initiation of closure for Plant McIntosh Landfill No. 4.

[A] Denotes actual closure construction completion date.

VI. FINANCIAL SUMMARY

Georgia Power's CCR Asset Retirement Obligation

Prior to January 1, 2003, the Company included estimated costs for the future closure of ash ponds and landfills in the cost of removal component in depreciation rates. After mandatory adoption of the Financial Accounting Standards 143 — Asset Retirement Obligations in January 2003, now Accounting Standards Codification ("ASC") 410, the Company reclassified the costs to separate Federal Energy Regulatory Commission accounts, excluded the cost from depreciation rates, and began accounting for the cost as ARO. Such costs have consistently been included in rates established by the PSC since that time. From January 1, 2003, through December 31, 2023, the Company has spent approximately $1.4 billion on CCR ARO activities.

Georgia Power consistently monitors and evaluates project assumptions, including, but not limited to, timing and schedule assumptions for permits and construction, project scope, post-closure activities, and estimated future escalation. Georgia Power's current cost estimate applicable to retail customers over the next approximately 60 years is $7.4 billion, which includes the approximately $1.4 billion in actual costs previously incurred.

The current cost estimate of $7.4 billion is approximately $370 million lower than the previous forecast of $7.8 billion that was included in the October 2023 Semi-Annual Report. The overall decrease in Georgia Power's total retail EAC is driven by the remaining application of lower expected future escalation rates to all projects in the portfolio. These expected rates are applied as required by ASC 410 ARO accounting standards:

Dollars in billions	*October 2023 Semi-Annual Report*	*March 2024 Semi-Annual Report*	*Change*
Nominal Retail EAC	*$6.7*	*$6.7*	*($0.02)*
Forecasted Escalation	*$1.0*	*$0.7*	*($0.35)*
Total Retail EAC	*$7.76*	*$7.40*	*($0.37)*

The program's nominal forecast in the March 2024 Semi-Annual Report remained consistent with the October 2023 Semi-Annual Report. Minor pricing updates, primarily reflecting certain labor, fuel, and contract rates were included in the fourth quarter 2023 forecast. These updates serve to provide the best estimate of nominal forecast amounts and ensure the ARO liability has the appropriate starting point to escalate the expected future cash flows. The following subsection "Current Cost Estimates" describes the

project factors contributing to the Company's latest nominal estimate update in more detail.

Forecasted escalation rates applied to the fourth quarter 2023 CCR ARO liability revision – the results of which are presented in the Company's March 2024 Semi-Annual Report – reflect an expectation of negative market inflation in the short term, and lower rates over the long term, compared to previous inflation rate forecasts. These expectations drive the decrease in the program's EAC in the Company's March 2024 Semi-Annual Report. The inflation rate movement observed in the sites that underwent a third quarter 2023 revision of the CCR ARO liability, as reported in the Company's October 2023 Semi-Annual Report, have now been extended to encompass all sites within the program resulting in the EAC decrease. Several market factors contributed to the inflation rate forecast applied to this update, such as the following: (1) the central bank policy of raising rates was expected to reduce demand and lower inflation, (2) high inventory levels were expected to reduce the demand for new production, thus reducing prices for raw materials, and (3) natural gas prices had retreated from fall of 2022 to spring of 2023. For these reasons, the inflation rate forecast applied to the fourth quarter 2023 CCR ARO liability revision reflects deflationary market pressures. As discussed in the Company's previous CCR ARO Semi-Annual Program Status Reports, forecasted escalation will likely continue to experience variations in the future. These changes may be magnified given today's non-standard inflationary environment. The Company is currently monitoring inflation trends that differ from the rationale embedded in the fourth quarter 2023 CCR ARO liability revision and will reflect any updated inflation rate assumptions in future liability revisions.

The Company will refine cost and closure plans as these projects progress. Cost recovery for the program was approved by the PSC in Georgia Power's 2019 and 2022 base rate cases (Docket No. 42516 and 44280, respectively) and, as directed in the Final Orders for those proceedings, is updated in the Company's annual fall compliance filings. Georgia Power filed its last compliance filing on October 2, 2023, to set base rates for 2024, and expects to file the 2025 Compliance filing by October 1, 2024, to set base rates for 2025, as ordered by the Commission in Docket No. 44280. These filings reflect Environmental Compliance Cost Recovery ("ECCR") tariff revenue requirements related to CCR ARO compliance costs.

Various factors could impact the Company's CCR ARO compliance efforts, construction schedules, permit approvals, and overall cost moving forward. These factors include, but are not limited to, regulatory deadlines, permit issuance and requirements, state and federal rule amendments, legislative action, material procurement, ash volumes, design and/or scope changes, availability of qualified contractors, contractor performance, weather, completion of competitive bids and contracts for pending projects, water treatment plans and technology, optimization of groundwater monitoring networks,

corrective action requirements, long-term maintenance needs, potential to take advantage of beneficial use opportunities and to achieve projected volumes of ash into the beneficial use market, site-specific conditions, the impact of emerging technologies throughout the life of the program, and other market and external factors.

The Company is dedicated to establishing and implementing appropriate mitigation efforts to reduce the probability and potential impacts of such risks. With continued focus on strategic project leadership and oversight of the risk and change control processes, the Company is committed to actively managing the CCR program and will continue to seek ways to improve consistency, accuracy, and visibility across the program for decades to come.

Current Cost Estimates

During the fourth quarter of 2023, Georgia Power reviewed its estimates to close its CCR units in compliance with the Federal and Georgia CCR Rules at all of its active and retired generating plants. Cost estimates were refined and revised to reflect updates to the timing of future cash outlays and other project factors. The Company's CCR ARO liability was adjusted to reflect the outcomes from this update, and the results are presented in this March 2024 Semi-Annual Report.

The current forecasted spend is the best estimate Georgia Power has at this time for this long-term compliance program spanning up to 60 years into the future. The Company's cost estimates are based on various assumptions related to closure and post-closure costs, timing of future cash outlays, inflation and discount rates, and the methods for complying with closure requirements. Georgia Power will continue to update its cost estimates and ARO liabilities periodically as additional information related to these assumptions becomes available.

The fourth quarter 2023 update – the results of which are presented in the Company's March 2024 Semi-Annual Report – included several notable factors, including, but not limited to, the following:

- An updated estimate for Branch to incorporate the expected impacts of the site's beneficial use contract executed during 2023, which is described in Section IV of this report. Major themes of the Branch estimate update include the projected near-term installation of beneficial use processing equipment, a forecasted schedule extension to support the recent beneficial use plans, the incorporation of projected beneficial use sales, and the expected elimination of Branch Landfill Cells 7-10 from the ash pond closure plans.

- An extension of the post-closure water treatment forecast at Yates to align with current closure plans at the site.

- Updated cost and schedule assumptions at McDonough to reflect the incorporation of the final stages of CCR movement expected to be underway in 2024.

- The incorporation of contract updates associated with the Company's beneficial use project for Bowen's ash pond, which is described in Section IV of this report.

- Other forecast updates associated with the regular review of project schedules, the assessment of project risks and opportunities, current market pricing, long-term care assumptions, and other similar project factors.

These updates resulted in an overall net benefit to the program, which was used to fund the program's management reserve. Therefore, the minor change in the program's total nominal EAC was the result of the impacts of updating nominal forecasts for certain labor, fuel, and contract items as described in the preceding subsection "Georgia Power's CCR Asset Retirement Obligation".

Table 6, Table 7, and Table 8 below contain the latest projected estimates for Georgia Power's CCR ARO ash pond closure and landfill projects. See Appendix C for further details on site-specific financial summary tables. These estimates incorporate the assumptions discussed in the preceding paragraphs, as well as the near-term and longer-term assumptions referenced below.

Near-Term Cash Flows

Updated assumptions as of the fourth quarter of 2023 have resulted in a retail cash flow forecast for the program for years 2023–2025 that is relatively consistent with the program's total retail cash flow forecast included in the October 2023 Semi-Annual Report for the same time period. Notable factors contributing to the overall cash flow changes in the 2023–2025 time period since the October 2023 Semi-Annual Report include, but are not limited to:

- Maintenance work for the Arkwright AP-1 landfill to improve access and prepare for final closure construction, as well as expected additional front-end planning and engineering to evaluate closure plans at the site, increased cash flows during this period.

- The implementation of beneficial use at Branch increased cash flows during this period so that ash processing equipment can be installed at the site. The

installation of this equipment will allow ash from the site to be processed for use in the ready-mix concrete market and create overall expected value for the project through increased ash sales and benefits to closure activities.

- Updated cost and schedule assumptions at McDonough to reflect the incorporation of the final stages of CCR movement increased cash flows during this period.

- Contract updates associated with the Bowen ash pond beneficial use project caused cash flows to decrease during this period.

- Updated contractor productivity assumptions for Hammond AP-1/AP-2 caused a schedule extension for the project thereby decreasing cash flows during this period and pushing them into future years.

- A decrease in expected future escalation for years 2023–2025 based on the factors described in the preceding subsection “Georgia Power’s CCR Asset Retirement Obligation” caused cash flows to decrease during this period.

Long-Term Project Assumptions

The Company, with input from third-party experts, has developed forecasts for these long-term projects, some of which span up to 60 years into the future, based on a combination of factors including, but not limited to, regulatory considerations, engineering studies, detailed closure design, constructability reviews, construction progress, water treatment considerations, operational needs, and post-closure requirements for the sites.

The Company is actively managing these long-term projects and will continue to make updates to reflect upward and downward pressures on cost and schedules for each project. There are several activities or factors in the near term that could impact closure costs and schedule, which will be closely monitored as the portfolio of projects mature. These include, but are not limited to, the following: the completion of detailed design for all sites, active construction progress, contractor performance, completion of competitive bids and contracting for pending projects, approval and implementation of remaining dewatering plans, the potential to take advantage of beneficial use opportunities during closure, actions pertaining to ongoing ACMs, and additional environmental regulatory actions and requirements.

Similarly, there are factors that could impact the projects as construction activities are completed and sites enter post-closure. These factors include, but are not limited to, the development of future beneficial use opportunities as the ash market matures, refinement of labor assumptions, optimization of groundwater monitoring networks, advancement of water treatment technologies, refinement of long-term maintenance assumptions for grass and engineered turf, and realization of the overall impact of emerging technologies on the program.

Estimating and forecasting activities, as well as contracting activities for future work, are expected to be performed throughout the execution of the program.

Table 6. Current Cost Estimates for CCR ARO Ash Pond Closure Projects

Ash Ponds

($ in Millions)

Facility	Project to Date Actuals Through Dec 2023*	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Bowen	$ 248.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Branch	$ 192.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Hammond	$ 128.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Kraft	$ 8.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McDonough	$ 144.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McIntosh	$ 21.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McManus	$ 108.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Mitchell	$ 129.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Scherer	$ 20.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Wansley	$ 35.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Yates	$ 270.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Ash Pond Subtotal	**$ 1,306.5**	**$ 294.7**	**$ 292.8**	**$ 1,059.6**	**$ 1,070.9**	**$ 1,821.3**	**$ 5,845.8**
*Escalation included in Forecast above***	*N/A*	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	*$ 336.9*

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003, through December 31, 2023*
***Forecasted escalation is applied based on ARO accounting standards under ASC 410.*
Note: Details may not add to totals due to rounding.

Table 7. Current Cost Estimates for CCR ARO Landfill Projects

Landfills

($ in Millions)

Facility	Project to Date Actuals Through December 2023*	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032 -2079 Forecast	Total
Arkwright	$ 61.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Bowen	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Branch	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Hammond	$ 10.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Kraft	$ 18.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McIntosh	$ 12.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Scherer	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Wansley	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Yates	$ 38.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill Subtotal	$ 140.1	$ 29.2	$ 38.8	$ 193.9	$ 249.9	$ 900.8	$ 1,552.6
*Escalation included in Forecast above***	*N/A*	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	*$ 360.0*

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003, through December 31, 2023.*
***Forecasted escalation is applied based on ARO accounting standards under ASC 410.*
Note: Details may not add to totals due to rounding.

Table 8. Current Cost Estimates for CCR ARO Ash Pond Closure and Landfill Projects

($ in Millions)

Category	Project to Date Actuals Through December 2023*	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Ash Pond Subtotal	**$ 1,306.5**	**$ 294.7**	**$ 292.8**	**$ 1,059.6**	**$ 1,070.9**	**$ 1,821.3**	**$ 5,845.8**
Landfill Subtotal	**$ 140.1**	**$ 29.2**	**$ 38.8**	**$ 193.9**	**$ 249.9**	**$ 900.8**	**$ 1,552.6**
Total	**$ 1,446.7**	**$ 323.9**	**$ 331.6**	**$ 1,253.5**	**$ 1,320.8**	**$ 2,722.1**	**$ 7,398.5**
*Escalation included in Forecast above***	*N/A*	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	*$ 696.9*

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003, through December 31, 2023.*

***Forecasted escalation is applied based on ARO accounting standards under ASC 410.*

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

Actual Versus Budget Summary

Table 9. 2023 Year-to-Date Actual versus Budget Comparison

($ in Millions)

	January - December 2023 Actuals	January - December 2023 Budget*	January - December 2023 Variance
Arkwright	$ 22.9	**REDACTED**	**REDACTED**
Bowen	$ 78.2	**REDACTED**	**REDACTED**
Branch	$ 65.3	**REDACTED**	**REDACTED**
Hammond	$ 30.1	**REDACTED**	**REDACTED**
Kraft	$ 3.3	**REDACTED**	**REDACTED**
McDonough	$ 16.1	**REDACTED**	**REDACTED**
McIntosh	$ 2.7	**REDACTED**	**REDACTED**
McManus	$ 2.8	**REDACTED**	**REDACTED**
Mitchell	$ 36.3	**REDACTED**	**REDACTED**
Scherer	$ 5.9	**REDACTED**	**REDACTED**
Wansley	$ 10.8	**REDACTED**	**REDACTED**
Yates	$ 25.5	**REDACTED**	**REDACTED**
Total	**$ 299.7**	**$ 320.4**	**$ (20.7)**

Retail Cost Estimates
**Budget associated with the 2022 base rate case submitted to the PSC in Docket No. 44280.*
Note: Details may not add to totals due to rounding.

Table 9 summarizes 2023 year-to-date actual costs for CCR ARO activities at all sites compared to the budget associated with the 2022 rate case filing for the same time period. The variance to the forecast for the portfolio is primarily driven by the following:

- **Bowen**: The primary driver of the 2023 over-run is the incorporation of Bowen Landfill Cells 5 and 6 into the closure plans for the site, which was discussed in the Company's March 2023 CCR ARO Semi-Annual Report. While the development of Bowen Landfill Cells 5 and 6 results in an increase in cost in year 2023 compared to the assumptions included in the 2022 rate case filing in Docket No. 44280, the utilization of this onsite landfill capacity contributes to an overall expected benefit to the Bowen AP-1 closure. Specifically, the incorporation of Landfill Cells 5 and 6, coupled with the site's beneficial use plans, are expected to benefit the Bowen AP-1 closure based on the opportunity for future ash sales, opportunity for schedule benefits by allowing consistent excavation of ash, and an expected reduction in the amount of ash remaining onsite - with up to nine million tons of ash anticipated to be harvested, processed, and removed from the site over the duration of the project.

- **Hammond**: Over half of the 2023 under-run for the site is due to the change in disposal plans for Hammond AP-4, which was discussed in the Company's March 2023 CCR ARO Semi-Annual Report. Specifically, the Company is now planning to expand the existing Company-owned permitted Huffaker Landfill, and then move CCR from Hammond AP-4 by truck to be stored there. This is a change compared to the assumptions included in the 2022 rate case filing in Docket No. 44280, and results in a reduction in year 2023 for transportation means and methods, partially offset by additional permitting and design work necessary to support the updated plans. Ultimately this change in plans is expected to benefit the AP-4 phase of the project. The remaining 2023 under-run for the site is due to lower-than-expected rate of production and weather-related conditions over a series of months, for the ongoing work underway at Hammond AP-1, AP-2, and Huffaker Cells A/B.

- **McDonough**: The primary driver for the 2023 under-run at the site is due to a shift in the AP-1 barrier wall construction schedule to coincide with EPD's continued review of the engineering plans. This under-run was partially offset by over-runs for AP-2/3/4 driven by additional dewatering and cap-and-cover activities; the cost forecast and closure schedule for AP-2/3/4 have been revised to incorporate these activities.

- **McIntosh:** The 2023 under-run is primarily driven by reduced groundwater monitoring costs and water treatment. This is due to earlier than expected demobilization of water treatment system at AP-1 and associated contingency dollars.

- **Yates:** The 2023 over-run reflects an extension in closure schedule at the site and associated costs. This is primarily driven by increased logistical challenges due to the reduction in available workspace within the AMA footprint as the site nears closure. The over-run was partially offset by an under-run due to a shift in IPCC schedules to coincide with the ongoing closure work.

VII. APPENDIX A

Abbreviations and Terminology

ACM	**Assessment of Corrective Measures**
AMA	**Ash Management Area**
AP	**Ash Pond**
ARO	**Asset Retirement Obligation**
ASC	**Accounting Standards Codification**
CBR	**Closure By Removal**
CCR	**Coal Combustion Residual**
CIP	**Closure In Place**
EAC	**Estimate at Completion**
ECCR	**Environmental Compliance Cost Recovery**
ECS	**Environmental Compliance Strategy**
EPA	**Environmental Protection Agency**
EPD	**Environmental Protection Division**
GPC	**Georgia Power Company**
GWPS	**Groundwater Protection Standard**
IPCC	**Interim Post-Closure Care**
IRP	**Integrated Resource Plan**
LF	**Landfill**
PCC	**Post-Closure Care**
PSC	**Georgia Public Service Commission**
RFP	**Request for Proposals**

VIII. APPENDIX B

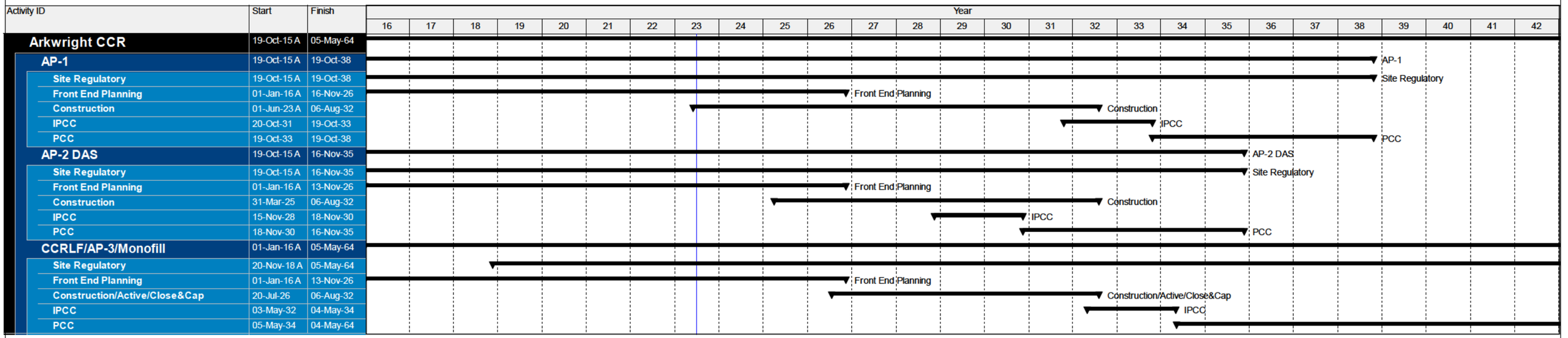
Schedule Summary - CCR Unit Level

The following Gannt charts include schedule summaries for each site, with activities for each ash pond and CCR landfill grouped into the categories listed below:

- Ash Ponds ("AP"):
  - **Name of the Unit**: Includes the overall duration of closure activities for the specified CCR unit(s).
  - **Site Regulatory**: For scheduling purposes, assumed to begin with the effective date of the Federal CCR Rule. Includes permitting activities (issuances, submittals, etc.), permit renewals, dewatering plan development, approvals, and other related compliance activities, and other required CCR or National Pollutant Discharge Elimination System compliance activities.
  - **Front-End Planning/Engineering/Procurement**: Project planning and construction preparations including engineering design, third-party constructability reviews, contracting milestones for dewatering, quality assurance, construction contracts, and other technical and engineering activities.
  - **Construction/Water Management**: Construction and water management related activities for the CCR-unit-specific closure plans. These construction activities may or may not include prime contractor mobilization milestones, closure phasing milestones per the unit-specific closure plan, restoration milestones/activities for the site/unit, water management activities/milestones, dewatering water treatment-related activities/milestone, and/or additional engineering- or construction-related activities.
  - **Interim Post-Closure Care ("IPCC")**: Includes activities that extend beyond CCR removal (for closure-by-removal units) and/or closure construction (for closure-in-place units), including groundwater monitoring, water management, general site maintenance, and other compliance activities in the interim of post-closure care.
  - **Post-Closure Care ("PCC"):** Includes activities that extend beyond closure or closure construction, including groundwater monitoring, water management, general site maintenance, and other compliance activities following IPCC. This category encompasses both post-closure for a closure-in-place project and post-closure construction for a closure-by-removal project.
- CCR Landfills ("LF"):
  - **Name of the Unit and Landfill Cell:** Includes the overall duration of activities for the specified CCR unit(s).
  - **Active Landfill:** Includes the timeframe the landfill cell was or was projected to be active and receiving CCR. This notation is used for CCR landfills

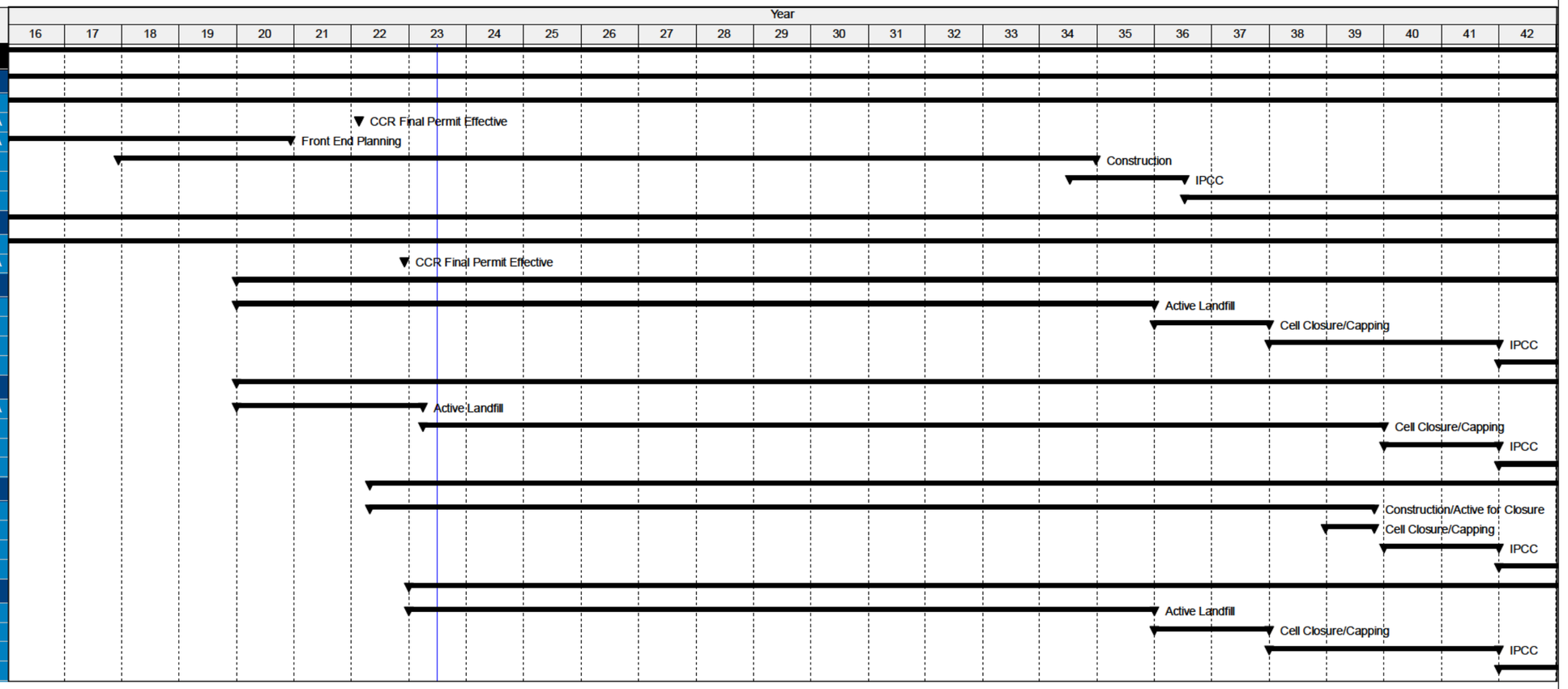
receiving CCR for the closure of other onsite CCR closure projects or for operational generating units ongoing storage of CCR.

- **Cell Closure/Capping/Closure Construction/Water Management:** Includes closure construction milestones, water management activities, and compliance activities related to the final closure.
- **IPCC**: Includes activities that extend beyond closure construction, including groundwater monitoring, water management, general site maintenance, and other compliance activities in the interim of PCC.
- **PCC:** Includes activities that extend beyond closure or closure construction, including groundwater monitoring, water management, general site maintenance, and other compliance activities following IPCC. This category encompasses both post-closure for a closure-in-place project and post-removal for a closure-by-removal project.

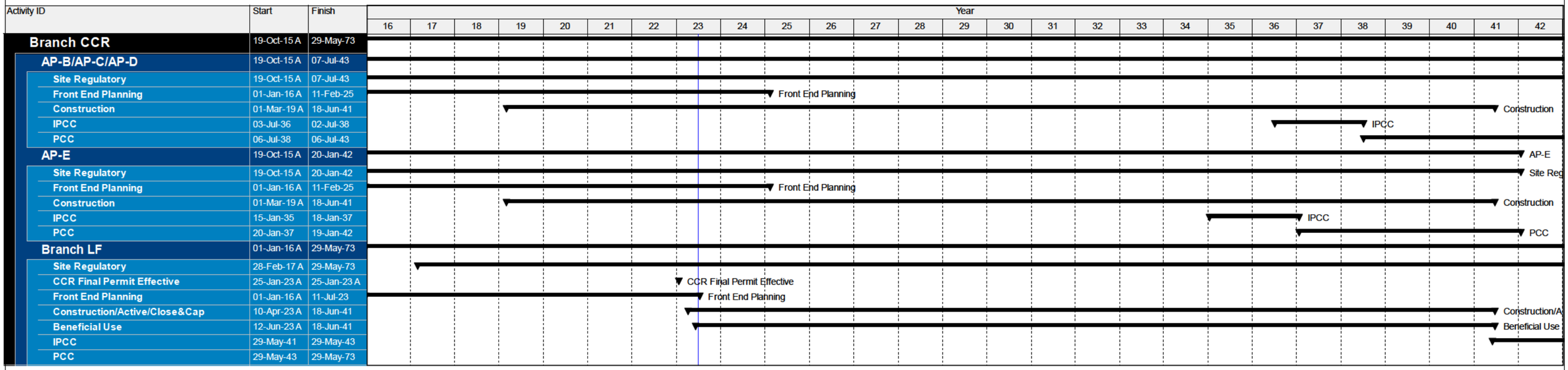


Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

Activity ID	Start	Finish
Bowen CCR	12-May-08 A	01-Jan-72
AP-1	19-Oct-15 A	07-Jul-66
Site Regulatory	19-Oct-15 A	07-Jul-66
CCR Final Permit Effective	17-Feb-22 A	17-Feb-22 A
Front End Planning	01-Jan-16 A	08-Dec-20 A
Construction	14-Dec-17 A	21-Dec-34
IPCC	06-Jul-34	06-Jul-36
PCC	06-Jul-36	07-Jul-66
Bowen Landfill	12-May-08 A	01-Jan-72
Site Regulatory	12-May-08 A	01-Jan-72
CCR Final Permit Effective	08-Dec-22 A	08-Dec-22 A
LF Cells 1 & 2	02-Jan-20 A	01-Jan-72
Active Landfill	02-Jan-20 A	31-Dec-35
Cell Closure/Capping	01-Jan-36	31-Dec-37
IPCC	01-Jan-38	31-Dec-41
PCC	01-Jan-42	01-Jan-72
LF Cells 3 & 4	02-Jan-20 A	01-Jan-72
Active Landfill	02-Jan-20 A	31-Mar-23 A
Cell Closure/Capping	31-Mar-23 A	31-Dec-39
IPCC	01-Jan-40	31-Dec-41
PCC	01-Jan-42	01-Jan-72
LF Cells 5 & 6	29-Apr-22 A	01-Jan-72
Construction/Active for Closure	29-Apr-22 A	28-Oct-39
Cell Closure/Capping	24-Dec-38	28-Oct-39
IPCC	01-Jan-40	31-Dec-41
PCC	31-Dec-41	01-Jan-72
LF Cells 9 & 10	01-Jan-23 A	01-Jan-72
Active Landfill	01-Jan-23 A	31-Dec-35
Cell Closure/Capping	01-Jan-36	31-Dec-37
IPCC	01-Jan-38	31-Dec-41
PCC	01-Jan-42	01-Jan-72

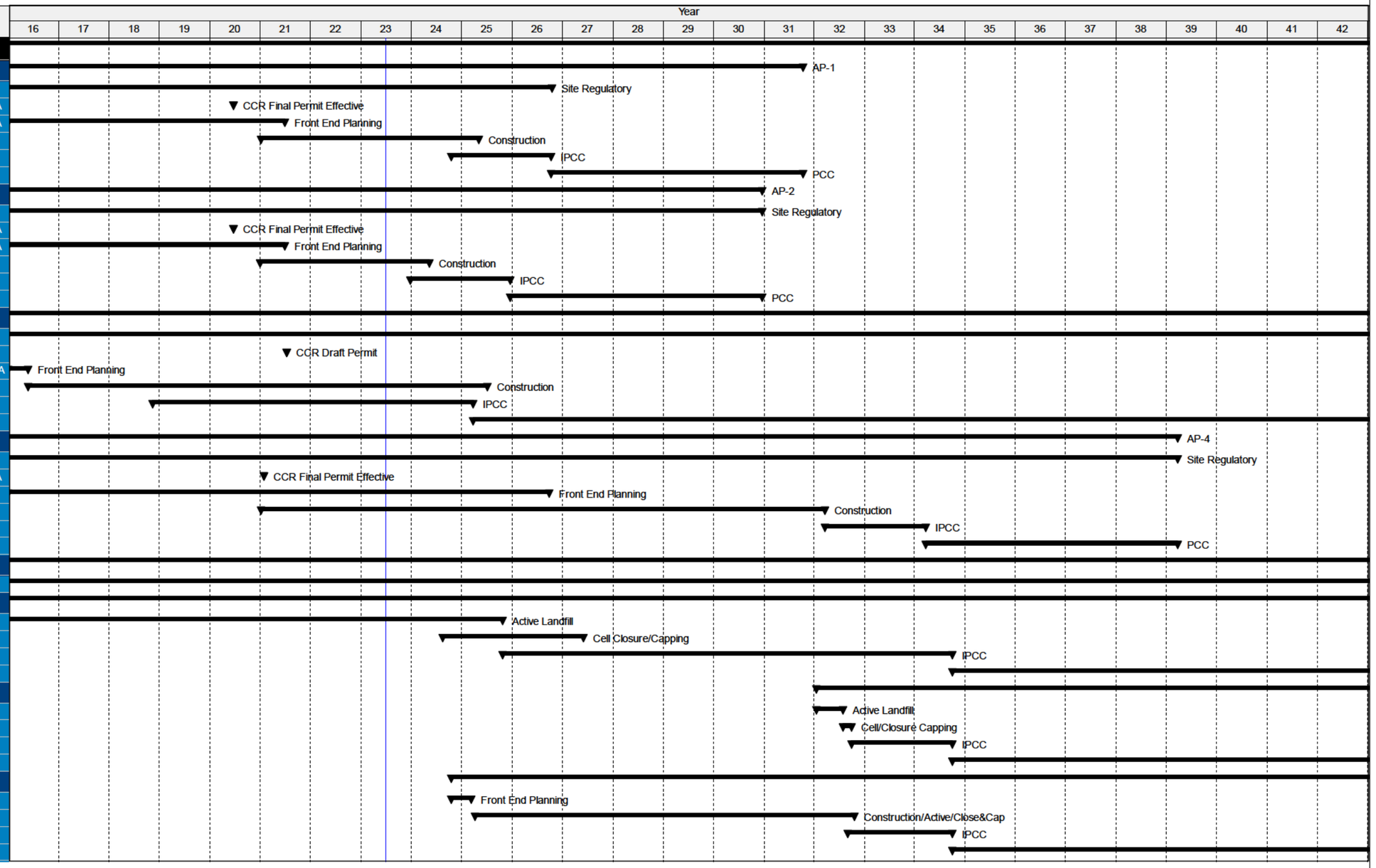


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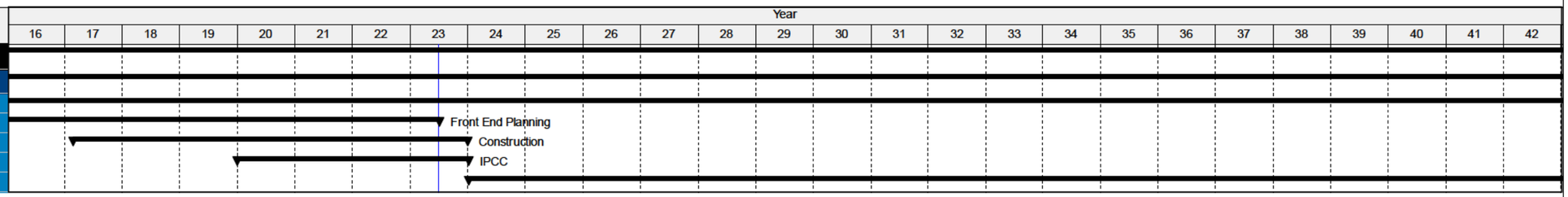
Activity ID	Start	Finish
Hammond CCR	01-Jan-08 A	30-Sep-64
AP-1	19-Oct-15 A	14-Oct-31
Site Regulatory	19-Oct-15 A	16-Oct-26
CCR Final Permit Effective	22-Jun-20 A	22-Jun-20 A
Front End Planning	01-Jan-16 A	30-Jun-21 A
Construction	11-Jan-21 A	08-May-25
IPCC	19-Oct-24	15-Oct-26
PCC	15-Oct-26	14-Oct-31
AP-2	19-Oct-15 A	23-Dec-30
Site Regulatory	19-Oct-15 A	23-Dec-30
CCR Final Permit Effective	22-Jun-20 A	22-Jun-20 A
Front End Planning	01-Jan-16 A	30-Jun-21 A
Construction	04-Jan-21 A	13-May-24
IPCC	23-Dec-23	22-Dec-25
PCC	22-Dec-25	22-Dec-30
AP-3	19-Oct-15 A	29-Mar-55
Site Regulatory	19-Oct-15 A	29-Mar-55
CCR Draft Permit	12-Jul-21 A	12-Jul-21 A
Front End Planning	01-Jan-16 A	25-May-16 A
Construction	26-May-16 A	09-Jul-25
IPCC	13-Nov-18 A	28-Mar-25
PCC	28-Mar-25	26-Mar-55
AP-4	19-Oct-15 A	21-Mar-39
Site Regulatory	19-Oct-15 A	21-Mar-39
CCR Final Permit Effective	27-Jan-21 A	27-Jan-21 A
Front End Planning	01-Jan-16 A	28-Sep-26
Construction	11-Jan-21 A	23-Mar-32
IPCC	21-Mar-32	21-Mar-34
PCC	21-Mar-34	21-Mar-39
Huffaker Rd LF	01-Jan-08 A	30-Sep-64
Site Regulatory	01-Jan-08 A	30-Sep-64
Huffaker Rd A/B	01-Jan-08 A	30-Sep-64
Active Landfill	01-Jan-08 A	26-Oct-25
Cell Closure/Capping	16-Aug-24	03-Jun-27
IPCC	27-Oct-25	30-Sep-34
PCC	01-Oct-34	30-Sep-64
Huffaker Rd Cell E	21-Jan-32	30-Sep-64
Active Landfill	21-Jan-32	29-Jul-32
Cell/Closure Capping	29-Jul-32	27-Sep-32
IPCC	28-Sep-32	30-Sep-34
PCC	01-Oct-34	30-Sep-64
Huffaker Rd Cell F	15-Oct-24	30-Sep-64
Front End Planning	15-Oct-24	13-Mar-25
Construction/Active/Close&Cap	09-Apr-25	22-Oct-32
IPCC	30-Aug-32	30-Sep-34
PCC	01-Oct-34	30-Sep-64



Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

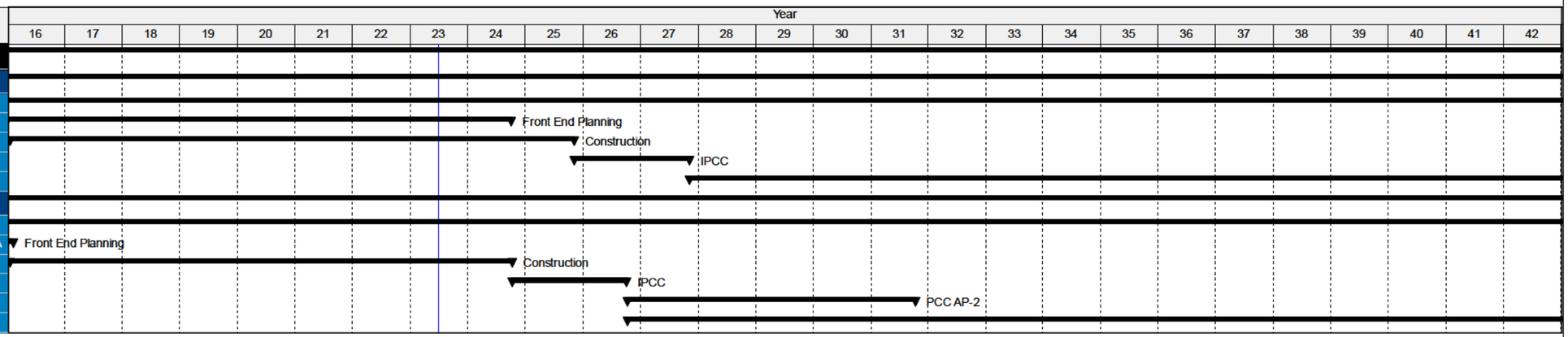
The actual finish date for the CCR Draft Permit for Hammond AP-3 is 13-Nov-2023. The actual start date for CCR Final Permit Effective for Hammond AP-3 is 14-Nov-2023.

Activity ID	Start	Finish
Kraft CCR	19-Oct-15 A	07-Jan-54
Grumman Rd.	19-Oct-15 A	07-Jan-54
Site Regulatory	19-Oct-15 A	07-Jan-54
Front End Planning	05-Nov-15 A	07-Jul-23
Construction	27-Feb-17 A	05-Jan-24
IPCC	03-Jan-20 A	07-Jan-24
PCC	08-Jan-24	07-Jan-54



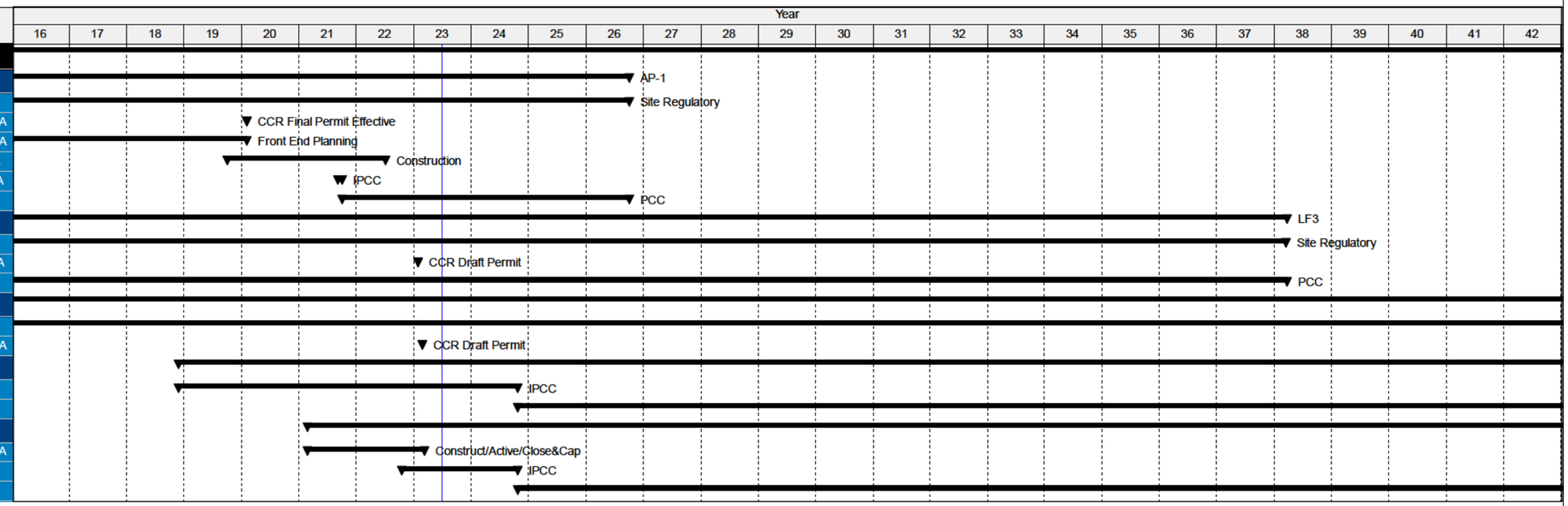
Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

Activity ID	Start	Finish
McDonough CCR	19-Oct-15 A	08-Nov-57
AP-1	19-Oct-15 A	08-Nov-57
Site Regulatory	19-Oct-15 A	08-Nov-57
Front End Planning	01-Jan-16 A	07-Oct-24
Construction	18-Jan-16 A	11-Nov-25
IPCC	07-Nov-25	07-Nov-27
PCC	08-Nov-27	08-Nov-57
AP-2/AP-3/AP-4	19-Oct-15 A	09-Oct-56
Site Regulatory	19-Oct-15 A	09-Oct-56
Front End Planning	01-Jan-16 A	12-Feb-16 A
Construction	19-Jan-16 A	11-Oct-24
IPCC	09-Oct-24	08-Oct-26
PCC AP-2	09-Oct-26	10-Oct-31
PCC AP-3/AP-4	09-Oct-26	08-Oct-56



Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

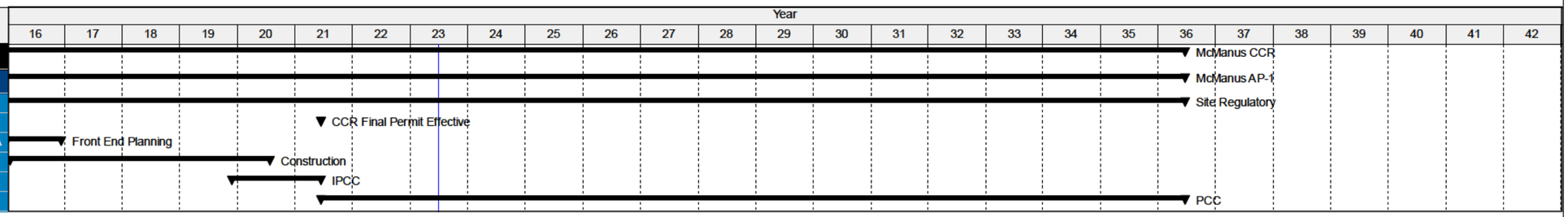
Activity ID	Start	Finish
McIntosh CCR	12-Mar-08 A	23-Oct-54
AP-1	19-Oct-15 A	06-Oct-26
Site Regulatory	19-Oct-15 A	05-Oct-26
CCR Final Permit Effective	06-Feb-20 A	06-Feb-20 A
Front End Planning	01-Jan-16 A	06-Feb-20 A
Construction	01-Oct-19 A	06-Jul-22 A
IPCC	08-Sep-21 A	05-Oct-21 A
PCC	06-Oct-21 A	06-Oct-26
LF3	12-Mar-08 A	21-Mar-38
Site Regulatory	12-Mar-08 A	12-Mar-38
CCR Draft Permit	31-Jan-23 A	31-Jan-23 A
PCC	21-Mar-08 A	21-Mar-38
LF4	19-Oct-15 A	23-Oct-54
Site Regulatory	19-Oct-15 A	23-Oct-54
CCR Draft Permit	24-Feb-23 A	24-Feb-23 A
LF4 Cell 1	27-Nov-18 A	23-Oct-54
IPCC	27-Nov-18 A	22-Oct-24
PCC	22-Oct-24	23-Oct-54
LF4 Cell 2A	23-Feb-21 A	23-Oct-54
Construct/Active/Close&Cap	23-Feb-21 A	15-Mar-23 A
IPCC	20-Oct-22 A	22-Oct-24
PCC	22-Oct-24	23-Oct-54



Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

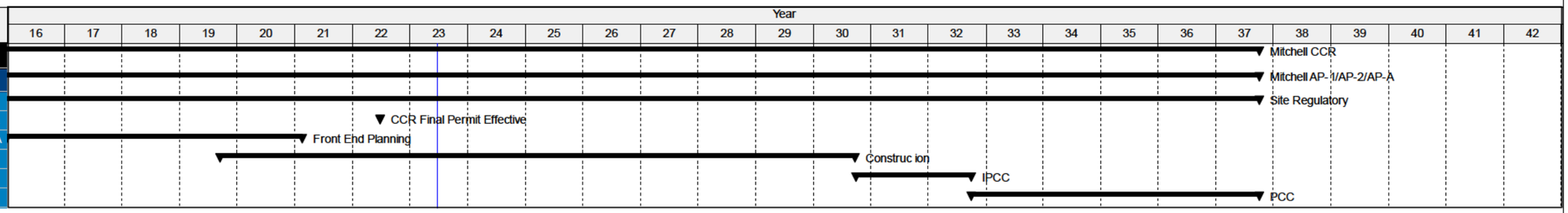
The actual finish date for the CCR Draft Permit for McIntosh CCR LF3 is 15-Mar-2023. The actual start date for CCR Final Permit Effective for McIntosh CCR LF 3 is 16-Mar-2023. The actual finish date for the CCR Draft Permit for McIntosh CCR LF4 is 18-Apr-2023. The actual start date for CCR Final Permit Effective for McIntosh CCR LF 4 is 19-Apr-2023.

Activity ID	Start	Finish
McManus CCR	19-Oct-15 A	19-Jun-36
McManus AP-1	19-Oct-15 A	19-Jun-36
Site Regulatory	19-Oct-15 A	19-Jun-36
CCR Final Permit Effective	18-Jun-21 A	18-Jun-21 A
Front End Planning	01-Jan-16 A	08-Dec-16 A
Construction	22-Jan-16 A	28-Jul-20 A
IPCC	28-Nov-19 A	18-Jun-21 A
PCC	18-Jun-21 A	18-Jun-36



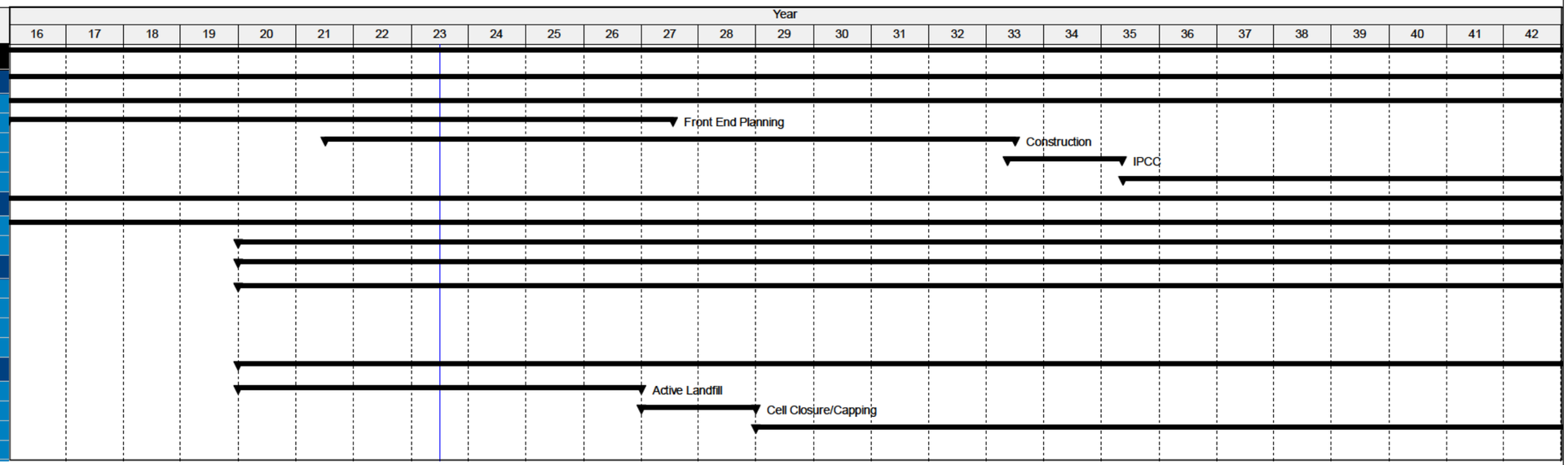
Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

Activity ID	Start	Finish
Mitchell CCR	19-Oct-15 A	01-Oct-37
Mitchell AP-1/AP-2/AP-A	19-Oct-15 A	01-Oct-37
Site Regulatory	19-Oct-15 A	01-Oct-37
CCR Final Permit Effective	28-Jun-22 A	28-Jun-22 A
Front End Planning	01-Jan-16 A	19-Feb-21 A
Construction	17-Sep-19 A	27-Sep-30
IPCC	30-Sep-30	30-Sep-32
PCC	30-Sep-32	29-Sep-37



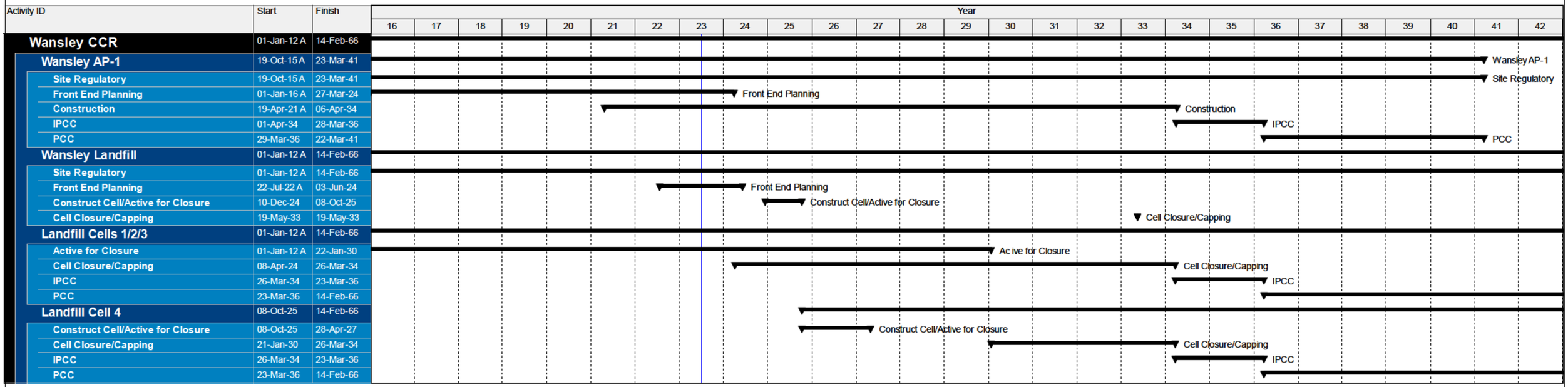
Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

Activity ID	Start	Finish
Scherer CCR	01-Jan-10 A	01-Jan-79
Scherer AP-1	19-Oct-15 A	17-May-65
Site Regulatory	19-Oct-15 A	17-May-65
Front End Planning	01-Jan-16 A	23-Jul-27
Construction	06-Jul-21 A	06-Jul-33
IPCC	17-May-33	16-May-35
PCC	17-May-35	16-May-65
Scherer LF	01-Jan-10 A	01-Jan-79
Site Regulatory	01-Jan-10 A	01-Jan-79
PCC	02-Jan-20 A	10-Mar-50
LF Cell 1	02-Jan-20 A	31-Dec-78
Active Landfill	02-Jan-20 A	31-Dec-44
Cell Closure/Capping	31-Dec-44	31-Dec-46
IPCC	31-Dec-46	30-Dec-48
PCC	30-Dec-48	31-Dec-78
PAC/ASH CELL	02-Jan-20 A	01-Jan-79
Active Landfill	02-Jan-20 A	31-Dec-26
Cell Closure/Capping	31-Dec-26	31-Dec-28
IPCC	31-Dec-28	31-Dec-48
PCC	31-Dec-48	01-Jan-79



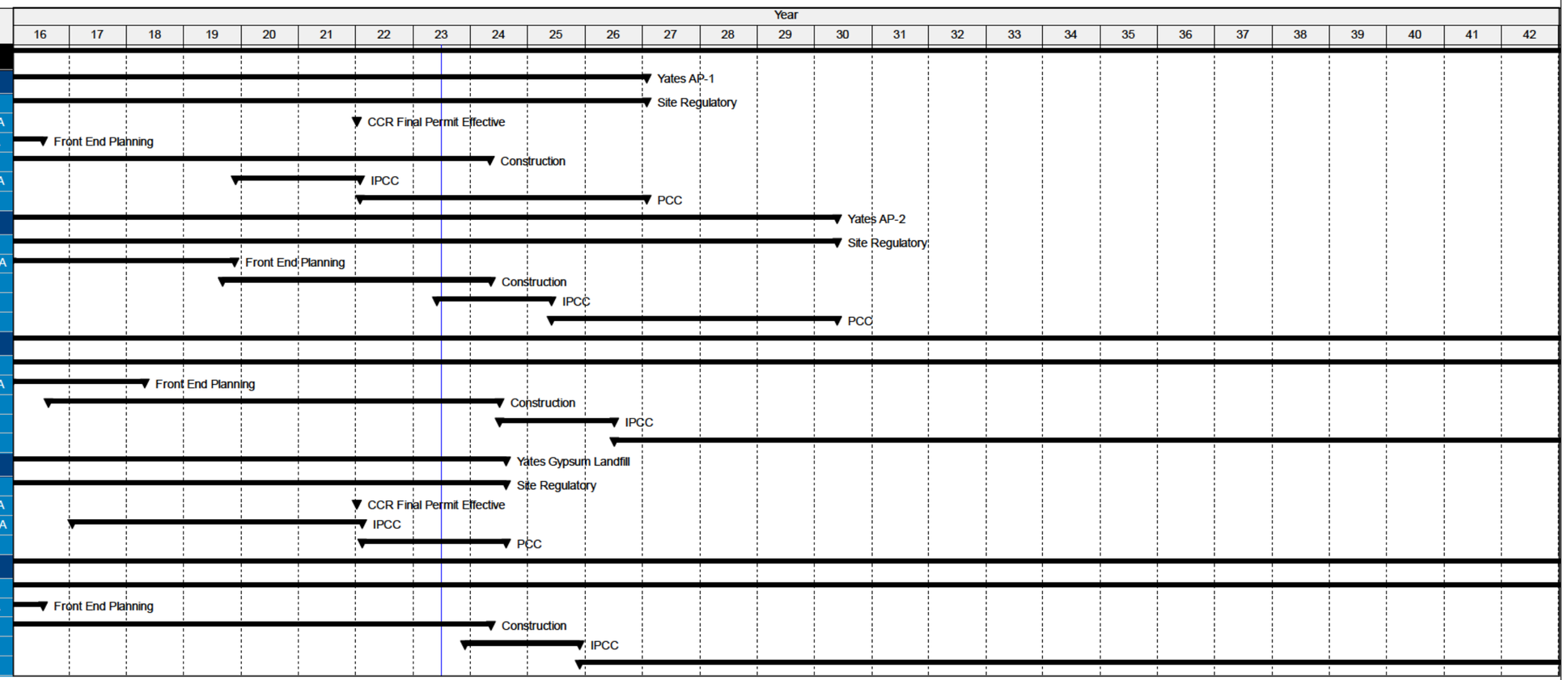
Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

The actual finish date for the CCR Draft Permit for Scherer CCR LF is 08-May-2023. The actual start date for CCR Final Permit Effective for Scherer CCR LF is 09-May-2023.



Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

Activity ID	Start	Finish
Yates CCR	04-May-15 A	08-Jul-56
Yates AP-1	04-May-15 A	01-Feb-27
Site Regulatory	19-Oct-15 A	01-Feb-27
CCR Final Permit Effective	06-Jan-22 A	06-Jan-22 A
Front End Planning	04-May-15 A	21-Jul-16 A
Construction	04-May-15 A	08-May-24
IPCC	27-Nov-19 A	31-Jan-22 A
PCC	31-Jan-22 A	01-Feb-27
Yates AP-2	19-Oct-15 A	31-May-30
Site Regulatory	19-Oct-15 A	31-May-30
Front End Planning	01-Jan-16 A	20-Nov-19 A
Construction	05-Sep-19 A	10-May-24
IPCC	01-Jun-23 A	30-May-25
PCC	31-May-25	30-May-30
Yates AMA (AP-3/AP-B/AP-B'/AP-A)	19-Oct-15 A	08-Jul-56
Site Regulatory	19-Oct-15 A	08-Jul-56
Front End Planning	01-Jan-16 A	30-Apr-18 A
Construction	19-Aug-16 A	06-Jul-24
IPCC	08-Jul-24	08-Jul-26
PCC	08-Jul-26	08-Jul-56
Yates Gypsum Landfill	22-Jul-15 A	15-Aug-24
Site Regulatory	22-Jul-15 A	15-Aug-24
CCR Final Permit Effective	05-Jan-22 A	05-Jan-22 A
IPCC	19-Jan-17 A	14-Feb-22 A
PCC	14-Feb-22 A	15-Aug-24
Yates R-6/AP-C	29-May-15 A	28-Nov-55
Site Regulatory	29-May-15 A	28-Nov-55
Front End Planning	29-May-15 A	21-Jul-16 A
Construction	29-May-15 A	10-May-24
IPCC	28-Nov-23	26-Nov-25
PCC	26-Nov-25	27-Nov-55



Note: Based on the timing of various reporting requirements to administer updates, actual activity dates may differ from forecasted activities at the time this version was created. The Company will continue to monitor all project assumptions and provide updates in the future.

The actual finish date for the CCR Draft Permit for Yates AP-2 is 10-Jul-2023. The actual start date for CCR Final Permit Effective for Yates AP-2 is 11-Jul-2023. The actual finish date for IPCC for Yates AP-2 is 18-Feb-2024. The actual start date for PCC - Post Removal for Yates AP-2 is 19-Feb-2024. The estimated end date for PCC - Post Removal for Yates AP-2 is 19-Feb 2029.

IX. APPENDIX C

Financial Summary - CCR Unit Level

The cost summaries include project-to-date actuals through December 31, 2022 and current estimated cost forecasts for each site, including each ash pond and CCR landfill. Additionally, costs by activity are grouped into the categories listed below:

- **Previous Closure Costs**: Actual costs incurred prior to January 1, 2014.
- **Program Management**: Compliance activities including, but not limited to, permitting, groundwater monitoring, corrective action, and program oversight, as well as management reserve which is cash flowed in years 2026 and beyond.
- **Front-End Planning**: Activities including design to 90-percent finalization, third-party constructability reviews, and other technical and engineering costs.
- **Detailed Engineering Costs**: Activities associated with the detailed engineering design and engineering support during construction.
- **Construction**: Construction activities for the CCR unit-specific closure plans. Construction activities include, but are not limited to, procurement, water treatment, site preparation, transportation improvements, site maintenance, beneficial use costs and credits during closure, stability and performance monitoring, ash excavation, ash transport, ash consolidation and placement, installation of a cover system, installation of engineering controls, site restoration, and landfill development to support ash pond closures. Construction activities also include construction-indirect costs such as temporary facilities, project and construction management, quality assurance, quality control, and temporary facilities.
- **Post-Closure Costs**: The time period after principal construction during which requirements to conduct monitoring, manage water, and conduct maintenance exist. This category represents both the actual and/or estimated IPCC and PCC costs for the site. This category encompasses both post-closure for a closure-in-place project and post-construction (or post-removal) for a closure-by-removal project.

Arkwright

Table 11. Arkwright Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Arkwright AP-1,2,3,Landfill	Closure by removal and consolidation to permitted landfill	$ 61.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 61.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 12. Arkwright Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 61.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $22.9 million consist primarily of detailed design, front-end planning, and landfill maintenance in addition to early site work, mobilization of water management activities and maintenance activities at AP-1. Activities expected during 2024 include continued design work, early site work, ongoing site maintenance, and permitting activities.

Bowen

Table 13. Bowen Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place with liner	$ 248.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Bowen CCR Landfill	Ac ive landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 248.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 14. Bowen Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 248.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $78.2 million consist primarily of structural fill, liner system construction, material delivery and stockpiling, construction of Bowen Landfill Cell 5 and 6, and construction of the on-site beneficial use facility. Activities expected during 2024 include continued excavation of AP-1 CCR, completion of Landfill Cells 5 and 6 construction, and start of beneficial use production.

Branch

Table 15. Branch Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-A	Closure by removal to permitted landfill	$ 1.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B	Closure by removal to permitted landfill	$ 21.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-C	Closure by removal to permitted landfill	$ 23.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-D	Closure by removal to permitted landfill	$ 15.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-E	Closure by removal to permitted landfill	$ 130.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 192.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 16. Branch Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 192.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $65.3 million consist primarily of contractor mobilizations, on-going water management/dewatering, landfill construction, laydown area development and beneficial use design, procurement, and initial construction activities. Activities expected during 2024 include front end planning, procurement, permitting activities, landfill cell construction, and beneficial use facility construction.

Hammond

Table 17. Hammond Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 27.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill	$ 43.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 26.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Closure by removal to permitted landfill	$ 30.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Huffaker Road CCB Facility	Closure in place	$ 10.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 138.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 18. Hammond Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 138.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $30.1 million consist primarily of continued AP-1 and AP-2 ash excavation activities and initial procurement of streambank mitigation credits for Huffaker landfill expansion in support of ash pond closure, as well as dewatering and water management activities and AP-4 permitting support. Additionally, this included final cover liner material purchased ahead of schedule due to availability of reduced material pricing. Activities expected during 2024 include AP-1/AP-2 ash excavation activities, procurement of remaining streambank mitigation credits for Huffaker landfill expansion in support of ash pond closure, and AP-4 and Huffaker Cells E & F detailed design.

Kraft

Table 19. Kraft Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 8.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Grumman Road Landfill	Closure in place	$ 18.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 27.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 20. Kraft Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 27.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $3.3 million consist primarily of groundwater monitoring activities and associated oversight costs, and maintenance and construction activities. Activities expected during 2024 include continued groundwater monitoring, continued maintenance and construction activities, and program management.

McDonough

Table 21. McDonough Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place	$ 33.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 17.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 40.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Advanced closure in place	$ 52.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 144.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 22. McDonough Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 144.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $16.1 million consist primarily of water treatment activities, AP-1 civil works scope, final stack and cover for AP-4, as well as groundwater monitoring costs for all four ash ponds, permitting support, execution of the AP-4 grouting scope, AP-2 final restoration, and demobilization of the prime contractor. Activities expected during 2024 include completion of additional excavation scope on AP-2/3/4 and permitting activities. The installation of the AP-1 barrier wall included in the 2024 forecast will ultimately coincide with the EPD's review of the engineering plans.

McIntosh

Table 23. McIntosh Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 21.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 3	Closure in place	$ 2.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 4	Closure in place	$ 9.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 34.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 24. McIntosh Current Estimated Cost by Executive Cost Code

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 34.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $2.7 million consist primarily of ash pond/landfill dike and dam maintenance, continued groundwater monitoring and associated oversight, and program management. Activities expected during 2024 include continued groundwater monitoring, maintenance, and program management.

McManus

Table 25. McManus Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 108.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 108.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 26. McManus Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 108.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $2.8 million consist primarily of groundwater monitoring, pond dike and dam maintenance, and program management. Activities expected during 2024 include continued groundwater monitoring, pond maintenance, and program management.

Mitchell

Table 27. Mitchell Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-A	Closure by removal to permitted landfill and beneficial reuse	$ 2.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-1	Closure by removal to permitted landfill and beneficial reuse	$ 58.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill and beneficial reuse	$ 68.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 129.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 28. Mitchell Current Estimated Cost by Executive Cost Code

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 129.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $36.3 million consist primarily of AP-1/AP-2 CCR excavation, stacking, and truck and rail car loading. The cost of these activities is partially offset by beneficial use sales proceeds. Activities expected during 2024 include continued excavation of AP-1/AP-2 and activities associated with the transport and beneficial use of CCR.

Scherer

Table 29. Scherer Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place	$ 20.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Active landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 20.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 30. Scherer Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 20.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $5.9 million consist primarily of procurement and installation of piping and electrical materials to support dewatering, procurement and installation of dewatering equipment, groundwater monitoring, and completion of the early site work construction package. Activities expected during 2024 include completion of dewatering equipment installation, commencement of water treatment, permitting support, and the start of ash movement activities onsite.

Wansley

Table 31. Wansley Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal	$ 35.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 35.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 32. Wansley Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 35.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $10.8 million consist primarily of review and technical support for Wansley AP-1 permit, continued front-end planning activities, and continued dewatering system commissioning activities, and procurement of streambank mitigation credits for landfill expansion in support of ash pond closure. Activities expected during 2024 include detailed design, permitting support, commencement of construction activities for the following: Landfill Cells 1-3, haul road, stream culvert foundation, and final commissioning of the dewatering system.

Yates

Table 33. Yates Current Estimated Cost by Ash Pond / Landfill

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal	$ 17.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 121.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 84.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-A	Closure by removal	$ 17.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B	Closure by removal	$ 16.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B'	Advanced closure in place	$ 12.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Gypsum Landfill	Inactive landfill / closure by removal to permitted landfill and beneficial reuse	$ 4.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
R6 Landfill	Inactive landfill / closure in place	$ 33.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
		$ 308.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Table 34. Yates Current Estimated Cost by Executive Cost Code

	Project to Date Actuals Through Dec 2023	2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 308.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2023*

Note: Details may not add to totals due to rounding

Notes:

2023 actuals through December of $25.5 million consist primarily of excavation, stacking of CCR and installation of the cover system. The site also continues to progress final site restoration/backfill activities. Activities expected during 2024 include AMA cap and cover completion, prime contractor demobilization, transition into IPCC, and permitting support activities.