Georgia Power

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PUBLIC DISCLOSURE

October 1, 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 July 31, 2024 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/ Jeremiah Haswell
Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company

Enclosure

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 17th day of September 2024.

Notary Public

My Commission expires:



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

Georgia Power Company

October 1, 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
October 1, 2024

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Georgia Power Company
Coal Combustion Residuals Asset Retirement Obligation Program
Semi-Annual Program Status Report
October 1, 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 July 31, 2024 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 March 2024 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.

  EPD has issued 17 final permits for Georgia Power's ash ponds and landfills and a draft permit for Wansley AP-1 was received in the third quarter of 2024. 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. 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.

  Through the permitting process, new generation is also continuing to be evaluated for CCR units, post closure. The solar project at McIntosh AP-1 started commercial operations in the third quarter of 2024.

  A certification of removal report was submitted to EPD in 2023 for Yates AP-2 East, the final removal area for AP-2, and was acknowledged by EPD in the first quarter of 2024. Site restoration for Yates AP-2 is complete.

- *Beneficial Use*: Beneficial use efforts continue at Georgia Power facilities including Plants Bowen, Branch, and Mitchell. Currently, up to nineteen million tons of ash are anticipated to be harvested, processed, and removed from sites throughout the multi-year closure timeframe. Infrastructure development for the beneficial use facility is ongoing at Plant Branch and the ash pond closure project schedule reflects the incorporation of beneficial use. At Plant Bowen, construction is complete and commercial operations began in the first quarter of 2024. 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.

  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. The Company has recently evaluated the potential to truck CCR from Plant Arkwright to the Plant Branch landfill to be screened for marketable ash and processed through the Plant Branch beneficial use facility. Based on the positive results of this evaluation, the Company plans to leverage this option and will update further in the next semi-annual report. 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.

- *EPA Regulatory Actions:* On May 8, 2024, EPA published the final Legacy CCR Surface Impoundment Rule which establishes two new categories of federally regulated CCR units: legacy CCR surface impoundments (“legacy SIs”) and CCR management units (“CCRMUs”). This final rule requires legacy SIs and CCRMUs to meet certain existing regulatory requirements, including a requirement to initiate closure within 42 months after the effective date of the final rule for legacy SIs, and within 54 months after the effective date of the final rule for CCRMUs. The final rule includes enhanced reporting requirements, alternative closure provisions for closure by removal, facility evaluations at all sites, and will become effective on November 8, 2024. Georgia’s state CCR rule currently regulates legacy CCR surface impoundments. The Legacy Rule aligns the requirements for these state-rule covered units with all other units covered by the federal rule. The Company will provide additional details in the 2025 Environmental Compliance Strategy (“ECS”) Report and is currently evaluating the impact to compliance costs.

On May 9, 2024, the EPA also published the final rule revising the Steam-Electric Effluent Limitations Guidelines ("ELG"). This rule establishes more stringent discharge limits for Bottom Ash Transport Water, Flue Gas Desulfurization Wastewater ("FGDW") and Combustion Residual Leachate ("CRL") that must be met by no later than December 31, 2029. The rule establishes a new subcategory which allows electric generation units to cease coal combustion by December 31, 2034, in order to avoid zero liquid discharge ("ZLD") limits on FGDW and CRL. For facilities that have previously retired coal-fired generation, the rule establishes more stringent requirements for CRL, based upon physical-chemical treatment. The rule also requires reporting and recordkeeping information be posted to a public-facing website such as existing CCR compliance websites. The Company is evaluating the impact from this rule and evaluating the impact on compliance costs. The Company will provide additional details in the 2025 ECS Report and the next CCR ARO Semi-Annual Program Status Report.

The Company continues to make progress on its CCR program with a continued focus on safety. The progress spans across many areas including construction, engineering, permitting, groundwater monitoring and reporting, remedy selection and corrective action, dewatering, and post-closure care.

This report provides 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 $1.6 billion in actual costs previously incurred. 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 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 EPD in late 2018. The permit documents submitted to 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 through September 2024

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

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

A total of 17 final permits issued to date and a draft permit for Wansley AP-1 was received from EPD in the third quarter of 2024. As part of the permitting process, 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 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 EPD required the Company to update its permit applications and plans, final permits have been largely consistent with the permit applications and did not significantly change the Company's closure plans.

In November 2023, EPD issued a final permit for Hammond AP-3, a closure-in-place unit. This issuance demonstrates EPD's concurrence with the closure plans and advanced engineering methods implemented as a part of those plans. 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.

EPD permitting activities for the remaining projects are currently expected to continue for the next several years. The Company continues to respond to 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.

The Company has Individual Permit applications submitted to the United States Army Corps of Engineers for permanent impacts to wetlands and streams within the Huffaker Road landfill expansion footprint at Plant Hammond and the landfill expansion at Plant Wansley. Streambank mitigation credits were obtained in 2023 for area impacts of each landfill expansion and additional streambank mitigation credits are expected to be obtained for the Huffaker Road landfill in 2024.

In December 2022, Georgia Power entered into a consent agreement with 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 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 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. Activities that influence the need for additional time to complete closure include EPD concurrence on depth and design associated with construction of a barrier wall surrounding AP-1. The consent order requires a milestone schedule, which was submitted to and approved by EPD in 2023. There was no monetary penalty associated with the consent order.

EPD is currently reviewing a Decontamination Certification and request to release the Yates Gypsum Landfill from its CCR permit, which were submitted by the Company in July 2024.

Through the permitting process, new generation is also continuing to be evaluated for CCR units, following closure. With the Commission's approval in the 2016 IRP (Docket No. 40161) for ash pond solar demonstration projects, options for future solar development were 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. The solar project at McIntosh AP-1 started commercial operations in third quarter of 2024. The other installations are planned to be initiated after approval by EPD, and once closure construction of the CCR units has been completed. Additionally, a solar pilot project continues at McDonough AP-3/4. Construction has also

begun at Plant Yates for the addition of three new gas-fired generating units (Yates 8-10) located partially in the footprint of Yates AP-1.

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 strong safety culture on all sites. Over 565,000 safe work hours have been performed year to date in 2024, with a cumulative program total of 5.7 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 EPD, to ensure compliance with water quality standards. As of January 2024, the Company is continuing dewatering operations at seven plants in accordance with EPD-approved dewatering plans: Plants Bowen, Branch, Hammond, McDonough, Mitchell, Scherer and Yates. In 2023, EPD approved Plant Scherer's ash pond dewatering plan. Dewatering activities at Plant Scherer began in 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. Between January and July 2024, independent wastewater treatment contractors treated approximately 1.3 billion gallons of water and independent sampling contractors conducted 346 sampling events for the effluent and receiving streams. To date, over 5.62 billion gallons of water has been treated and over 3,114 sampling events have been conducted for the effluent and receiving streams. Water quality monitoring data is reported monthly to 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, with treatment system demands impacted by site-specific rainfall and site-specific closure conditions. This may require differing treatment technologies at each site, and ongoing fluctuations in labor resource needs, operation schedules, and costs as the dewatering process is adjusted to accommodate ongoing closure needs. 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, report the results to EPD, and 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 July 2024, 18 additional groundwater wells and piezometers were installed, more than 1,150 groundwater samples were collected from all the wells, and the results were included in 61 groundwater reports submitted to 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), laboratory bench scale testing, pilot testing, remedy selection, and reporting to EPD.

Draft remedy selection reports for two Arkwright landfills were submitted to EPD 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

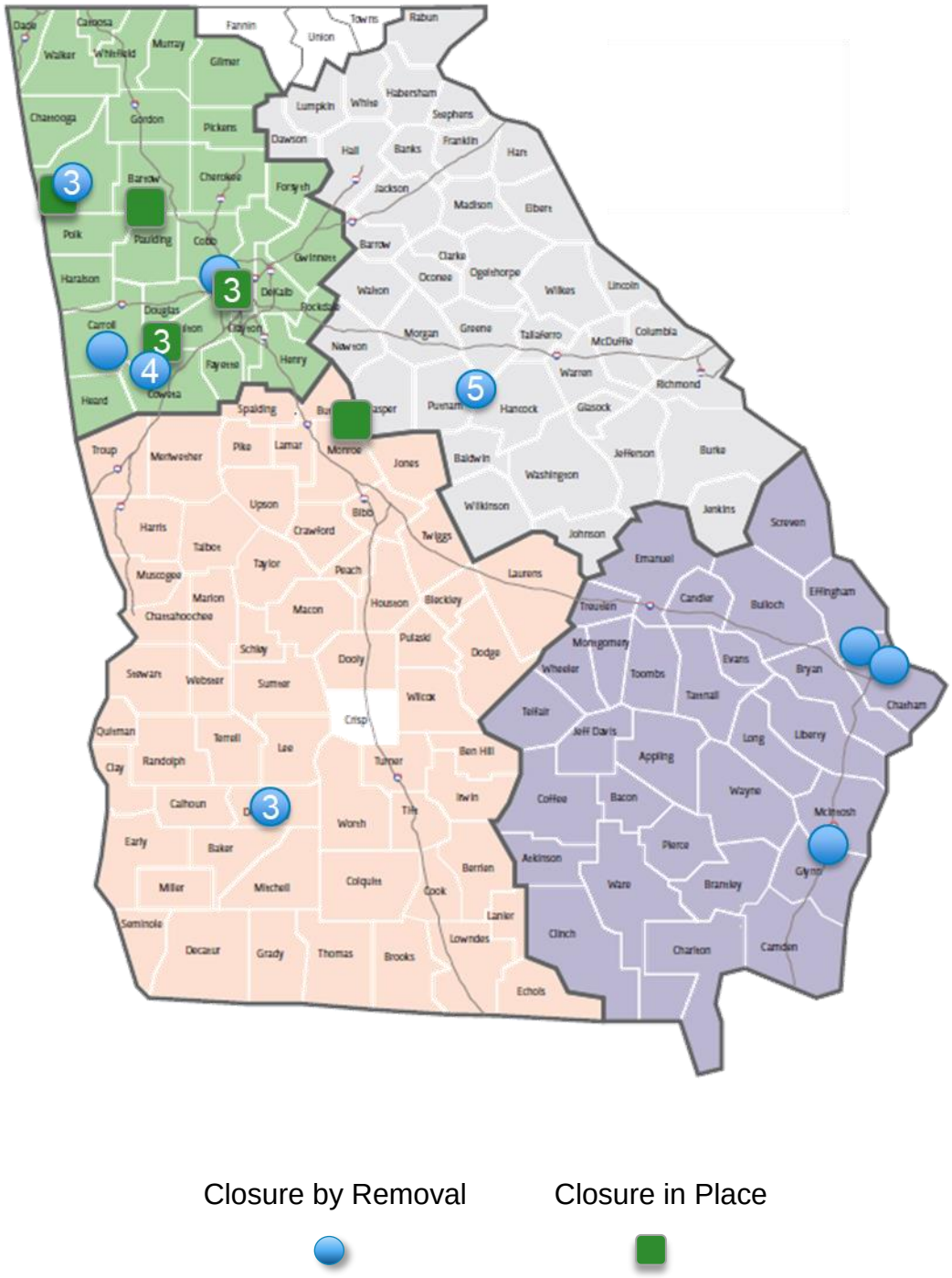
were prepared by independent engineers and geologists and contain site-specific data that is used to evaluate corrective measures and to select a proposed remedy for EPD to review and approve. Third-party, independent consultants will continue routine groundwater sampling, data evaluation, interpretation, 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, 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 began in first quarter of 2024 and supplemental testing is currently 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 were approved in the third quarter of 2024. Pilot testing of injections is currently underway.

Ash Pond Closure Progress

Georgia Power has 29 ash ponds at 11 sites.

Figure 2: Ash Pond Closure Locations



Closure by Removal Closure in Place

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 required deadlines provided by regulation or agreement with EPD following the guidance of the Federal and Georgia CCR Rules. 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 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 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 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. TreeWell® system installation is currently ongoing and expected to be complete by the end of 2024.			
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 EPD's Response and Remediation Program. The Company submitted a certification of removal report for AP-1 to EPD in 2018 as part of a site-wide Compliance Status Report. EPD provided concurrence with the Compliance Status Report in June 2020 and delisted the site from 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 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 EPD.			
Yates AP-1	CBR	PCC – Post-Removal	Completed
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 EPD.			

	Closure Strategy	Construction Status	Dewatering Status
Yates AP-2	CBR	PCC – Post Removal	Completed
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 for AP-2 East, the final removal area for AP-2, and was acknowledged by EPD in the first quarter of 2024. Site restoration is complete. The closed ash pond is currently functioning as a service water pond for the plant operations.			
Construction Underway or Significantly Completed			
Bowen AP-1	CIP	In Closure	Ongoing
Closure construction is ongoing on the 254-acre ash pond. AP-1 is being closed in place by excavating and consolidating CCR into a fully contained engineered structure (composite-lined and final-covered area). Infrastructure construction to process ash for beneficial use is complete and commercial operations began in the first quarter of 2024.			
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 complete, and a certification report is being prepared for submittal to EPD.			
McDonough AP-1	CIP	In Closure	Inactive
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. EPD continues its review of engineering plans for the barrier wall.			

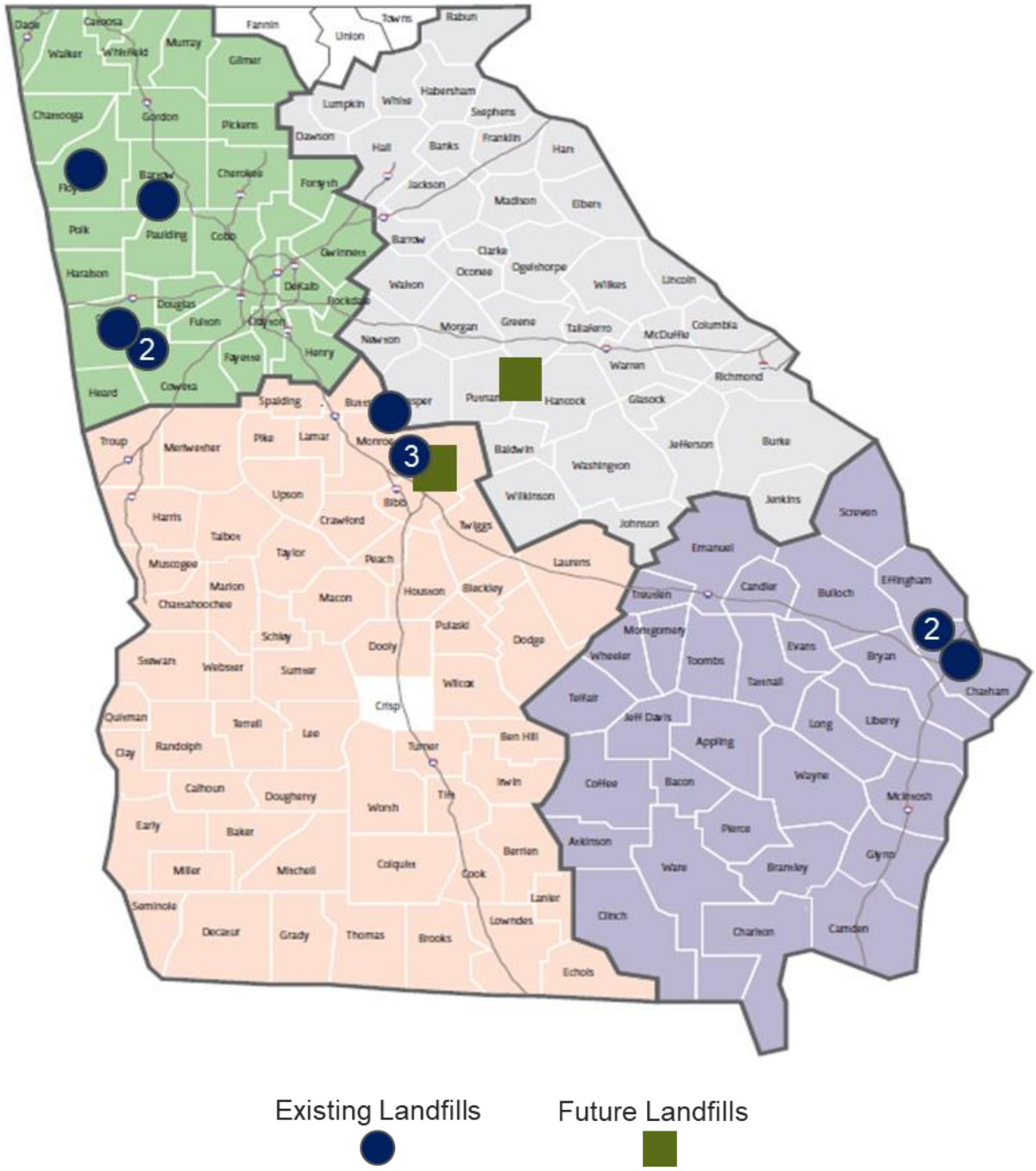
	Closure Strategy	Construction Status	Dewatering Status
McDonough AP-2, AP-3, AP-4	AP-2: CBR AP-3/4: CIP	In Closure	Ongoing
AP-2: CCR was removed from the 7-acre ash pond and consolidated into AP-1, AP-3, and AP-4. A certification of removal report has been submitted to and acknowledged by EPD. Site restoration 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 temporary AEM wells. Final stages of CCR movement are currently underway and expected to be complete in the first quarter of 2025.			
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-A, AP-B, AP-B', AP-3	AP-A/AP-B: CBR AP-3/AP-B': CIP	In Closure	Ongoing
Movement of CCR from the CBR ponds at Plant Yates has been completed. Installation of a cap cover system, which includes a geomembrane and will ultimately cover the consolidated AP3/APB' footprint of 88.5-acres upon completion, is in the final stages of construction. Consistent with the closure plans, an engineering measure consisting of a subsurface hydraulic conveyance system and associated treatment system has been incorporated into the closure construction plans. A beneficial use demonstration is currently underway to allow CCR material around transmission structures to remain in place and be removed in the future. The in-place beneficial use workplan is currently under EPD review. A certification of removal report for the remaining areas of AP-A has been submitted to and acknowledged by EPD. Site restoration is ongoing.			
Yates AP-C	CIP	In Closure	Completed
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 for the initial phases of work has been awarded. 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 March 2024, in accordance with 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 detailed design is complete. Landfill construction activities are underway at the onsite landfill to allow for the expansion, more details are in Table 3. 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 all its CCR landfills. The landfills at Plants Bowen, Scherer, Wansley, Hammond and McIntosh Landfill No. 4 support current plant operations or ash pond closure projects and are actively operated under CCR Permits or existing Solid Waste Permits. The landfills at former Plants Arkwright and Kraft (Grumman Rd), and Plant Yates and McIntosh Landfill No. 3 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 one future onsite CCR landfill at Plant Branch, 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. The Company has recently evaluated the potential to truck CCR from Plant Arkwright to the Plant Branch landfill to be screened for marketable ash and processed through the Plant Branch beneficial use facility. Based on the positive results of this evaluation, the Company plans to leverage this option and will update further in the next semi-annual report. Site restoration will be completed following CCR removal. Maintenance activities to improve access around AP-1 and prepare for final closure construction were 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 to support plant operations, while cells 5 and 6, currently under construction, will support ash pond closure. The landfill will undergo closure when permitted capacity is reached or when CCR disposal is no longer needed.	

	Landfill Status
Hammond Huffaker Road Landfill	**Operational for Closure**
The 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 EPD in 2023 to initiate the landfill expansion permitting process. Final site limitations are expected to be issued by EPD in third quarter of 2024. Streambank mitigation credits were obtained in 2023 for impacts to on-site streams resulting from the landfill's expansion; the Company 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 EPD. Site maintenance activities are ongoing.	
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 relocation of CCR from the former ash pond. 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 open until October 2025 unless additional two-year extensions are granted.	
Scherer Landfill	Operational for Generation
The CCR landfill will remain active in support of ongoing plant operations. The landfill will undergo closure when permitted capacity is reached or when CCR disposal is no longer needed. Cell 3 is currently in engineering and design with construction activities expected to begin in 2025.	

	Landfill Status
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 EPD in 2023 to initiate the landfill expansion permitting process. Final site limitations are expected to be issued by EPD in third quarter of 2024. Construction is underway to allow for the expansion of the onsite landfill and the Company is planning to replace the synthetic liner components and leachate collection system for the existing landfill cells to accommodate the additional ash over the expanded landfill footprint. In support of the landfill expansion, the Company purchased streambank mitigation credits and began stream relocation work in third quarter of 2024.	
Yates Gypsum Stack Landfill	PCC – Post-Removal
The Gypsum Landfill has been removed. A certification of removal report was submitted to EPD in January 2017 and acknowledged as complete by EPD in October 2020. EPD is currently reviewing a Decontamination Certification and request to release the Gypsum Landfill from its CCR permit, which were submitted by the Company in July 2024.	
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.	
Future CCR Landfills	
Arkwright Landfill	Future
As outlined above, the Company has recently evaluated the potential to truck CCR from Plant Arkwright to the Plant Branch landfill to be screened for marketable ash and processed through the Plant Branch beneficial use facility. Based on the positive results of this evaluation, the Company plans to leverage this option and will update further in the next semi-annual report. The permitting activities for a future onsite Arkwright CCR landfill have paused. EPD has approved a request for a two-year extension to the Site Limitations for submittal of a permit design for the new Arkwright landfill.	

	Landfill Status
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 June 2024, approximately 816,000 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 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.

Plant Bowen

Infrastructure construction for the new beneficial use facility at Plant Bowen is complete and commercial operations began in first quarter of 2024. Transportation of harvested ash from Plant Bowen for use in the ready-mix concrete market began in first quarter 2024, with approximately nine million tons of ash anticipated to be harvested, processed, and removed from the site over the duration of the contract period. Through July 2024, approximately 102,620 tons of ash has been harvested from the site. The procurement of the conveyor system planned for transportation to the beneficial use facility and landfill has paused due to lower than expected first year production rates from the beneficial use facility. The Bowen beneficial use facility has been under-performing in total sales quantities year-to-date, however, these reduced sales quantities are more than offset by the current market price received for each ton of ash sold as compared to what was originally assumed. Increased energy demand has boosted ash production from plant operations limiting harvested ash being processed through the beneficial use facility. The Company will continue to work with the contractor to manage productivity and market capacity with both operational and harvested ash. The Company has proactively engaged with the onsite contractor to review the processing facility design and operations to make recommendations for increased productivity. The Company intends to utilize learnings from this facility startup and optimization at its Plant Branch location.

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. The Company has recently evaluated the potential to truck CCR from Plant Arkwright to the Plant Branch landfill to be screened for marketable ash and processed through the Plant Branch beneficial use facility. Based on the positive results of this evaluation, the Company plans to leverage this option and will update

further in the next semi-annual report. Infrastructure development at Plant Branch has begun. Transportation of beneficiated ash from the Plant Branch beneficial use facility is expected to begin in 2026. Approximately eight million dry tons of ash are anticipated to be harvested, processed, and removed from site over the 15-year contract. Construction is underway on the beneficial use facility.

V. SCHEDULE SUMMARY

Estimated closure construction timeframes vary by location and are site-specific. Estimated ash pond closure 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 closure 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-fired 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 Gantt 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 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 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.

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 $1.6 billion in actual costs previously incurred and $0.7 billion in escalation.

Various factors could impact the Company's CCR ARO compliance efforts, construction schedules, permit approvals, and overall cost moving forward. 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.

The cost estimate has not changed since the March 2024 Semi-Annual report. The Company is currently reviewing all years in its CCR ARO forecast and expects to update its CCR ARO liability by year-end 2024 and theTable 8 below tables 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 third quarter of 2024 have resulted in a retail cash flow forecast for the program for years 2023–2025 that is relatively consistent with the program's forecast included in the March 2024 Semi-Annual Report.

As it relates to the timing of near-term cash flows, the Company has experienced and/or expects variability to its current near term forecast primarily due the following factors:

- In line with strict compliance deadlines mandated by federal and state CCR rules, the Company must continue work on ash pond closures while permitting discussions between Georgia EPD and EPA are ongoing. 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” (40 C.F.R. 257.102(d)(1)(v)), while also adjusting the schedule for certain activities to mitigate risk where possible.

- Updates to the cash flow pattern of unallocated project contingency based on risk analysis.

- Forecast updates at active sites based on actual progress, weather, contractor activities, beneficial use market trends, and other similar factors, as well as updates to expected activities at sites in the pre-construction phase, based on ongoing design, contracting, and permitting activities.

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. There are several factors that could impact closure costs and schedule, which will be closely monitored as the portfolio of projects matures. Estimating and forecasting activities 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 July 2024	August through December 2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Bowen	$ 279.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Branch	$ 228.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Hammond	$ 140.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Kraft	$ 8.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McDonough	$ 151.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McIntosh	$ 22.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McManus	$ 109.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Mitchell	$ 147.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Scherer	$ 23.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Wansley	$ 47.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Yates	$ 280.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Ash Pond Subtotal	**$ 1,438.3**	**163.0**	**$ 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 July 31, 2024*
***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 July 2024*	August through December 2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032 -2079 Forecast	Total
Arkwright	$ 69.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Bowen	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Branch	$ 0.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Hammond	$ 12.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Kraft	$ 20.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McIntosh	$ 12.7	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	$ 39.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill Subtotal	**$ 154.4**	**$ 14.9**	**$ 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 July 31, 2024*
***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 July 2024*	August through December 2024 Forecast	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
Ash Pond Subtotal	**$ 1,438.3**	**$ 163.0**	**$ 292.8**	**$ 1,059.6**	**$ 1,070.9**	**$ 1,821.3**	**$ 5,845.8**
Landfill Subtotal	**$ 154.4**	**$ 14.9**	**$ 38.8**	**$ 193.9**	**$ 249.9**	**$ 900.8**	**$ 1,552.6**
Total	**$ 1,592.7**	**$ 177.9**	**$ 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 July 31, 2024.*
***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. 2024 Year-to-Date Actual versus Budget Comparison

($ in Millions)

	January - July 2024 Actuals	January - July 2024 Budget*	January - July 2024 Variance
Arkwright	$ 8.2	**REDACTED**	**REDACTED**
Bowen	$ 30.9	**REDACTED**	**REDACTED**
Branch	$ 36.7	**REDACTED**	**REDACTED**
Hammond	$ 14.1	**REDACTED**	**REDACTED**
Kraft	$ 2.3	**REDACTED**	**REDACTED**
McDonough	$ 6.7	**REDACTED**	**REDACTED**
McIntosh	$ 1.2	**REDACTED**	**REDACTED**
McManus	$ 0.7	**REDACTED**	**REDACTED**
Mitchell	$ 18.2	**REDACTED**	**REDACTED**
Scherer	$ 3.0	**REDACTED**	**REDACTED**
Wansley	$ 12.9	**REDACTED**	**REDACTED**
Yates	$ 11.1	**REDACTED**	**REDACTED**
Total	**$ 146.0**	**$ 175.7**	**$ (29.7)**

Retail Cost Estimates
**Budget associated with the October 2023 compliance filing submitted to the PSC in Docket No. 44280.*
Note: Details may not add to totals due to rounding.

Table 9 summarizes 2024 year-to-date actual costs for CCR ARO activities at all sites compared to the budget associated with the third quarter of 2023 rate setting filing for the same period. The variance to the forecast for the portfolio is primarily driven by the following:

- **Bowen:** The primary driver for the underrun is timing of planned beneficial use sales credits and risk related contingencies. Also, delays resulting from more extensive subsurface removal of rock than expected during the construction of Landfill Cells 5 and 6.
- **Branch:** The primary driver of the 2024 overruns is the implementation of the beneficial use facility scope not previously captured in the compliance filing.
- **Hammond**: Underrun 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 2024 underrun 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. A portion of the under-run is also due to completion of final CCR movement underway within the permit boundary for AP-2, AP-3, and AP-4 and is expected to be complete in first quarter of 2025. This under-run was partially offset by over-runs for AP-3 and AP-4 driven by additional activities needed to support water treatment, dust control, AP-3 roadwork mobilization and maintenance of engineered turf sand on AP-1.

- **Mitchell**: The primary driver of the 2024 underruns is lower production rates than expected. Several factors contributed to lower production rates including multiple months of weather-related impacts, ash with moisture content above the allowable tolerance level, a train derailment, loss of a planned kiln site in addition to various unplanned and planned kiln outages.

- **Scherer:** The 2024 underrun is primarily driven by the delay of mobilization from the contractor to commence Phase 0-2 work.

- **Wansley:** The primary driver of the underruns is due to the need to complete the full replacement of landfill liner which has delayed the start of CCR movement.

- **Yates:** The 2024 underruns stem from reforecasting project expenditures to the second half of 2024 to align with the closure schedule. These project expenditures include additional CCR removal within the AMA permit boundary and the AMA water treatment system.

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

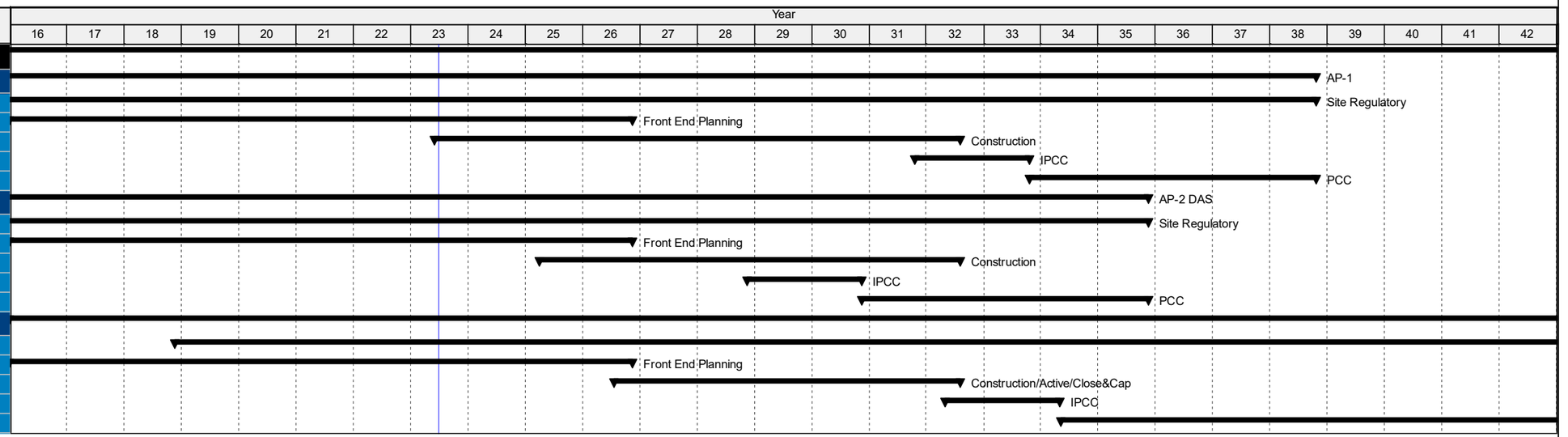
Schedule Summary - CCR Unit Level

The following Gantt 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. IPCC generally begins at the conclusion of major construction activities including CCR removal and restoration for closure by removal sites and final cover installation for close in place sites.
  - **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. PCC generally begins with a written acknowledgement from the Regulatory body (EPD), that all closure activities have been completed. This category encompasses both post-closure for a closure-in-place project and post-closure construction for a closure-by-removal project.

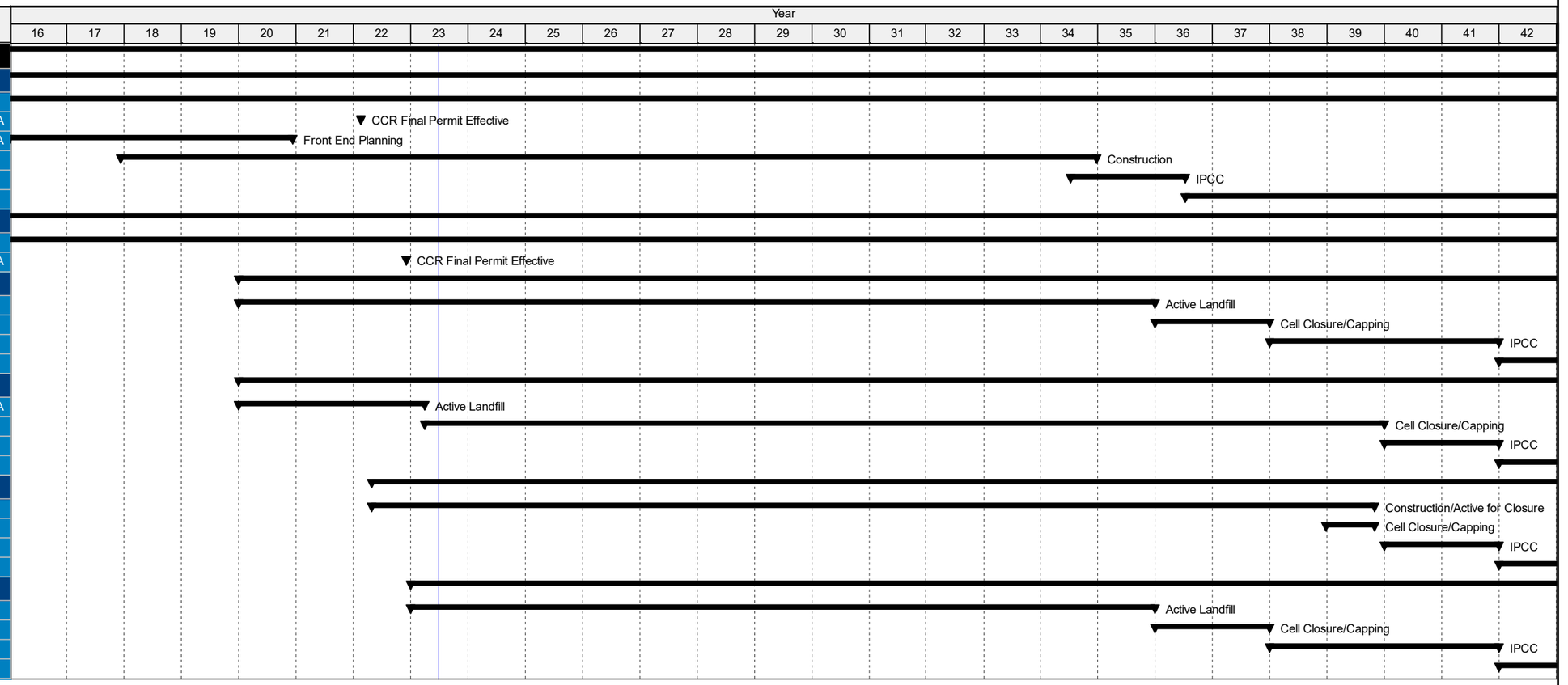
- CCR Landfills (“LF”):
    - **Name of the Unit and Landfill Cell:** Includes the overall duration of activities for the specified CCR unit(s).
    - **Active Landfill:** Includes the timeframe the landfill cell was or was projected to be active and receiving CCR. This notation is used for CCR landfills 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. IPCC generally begins at the conclusion of major construction activities including CCR removal and restoration for closure by removal sites and final cover installation for close in place sites.
    - **PCC:** Includes activities that extend beyond closure or closure construction, including groundwater monitoring, water management, general site maintenance, and other compliance activities following IPCC. PCC generally begins with a written acknowledgement from the Regulatory body (EPD), that all closure activities have been completed. This category encompasses both post-closure for a closure-in-place project and post-removal for a closure-by-removal project.

Activity ID	Start	Finish
Arkwright CCR	19-Oct-15 A	05-May-64
AP-1	19-Oct-15 A	19-Oct-38
Site Regulatory	19-Oct-15 A	19-Oct-38
Front End Planning	01-Jan-16 A	16-Nov-26
Construction	01-Jun-23 A	06-Aug-32
IPCC	20-Oct-31	19-Oct-33
PCC	19-Oct-33	19-Oct-38
AP-2 DAS	19-Oct-15 A	16-Nov-35
Site Regulatory	19-Oct-15 A	16-Nov-35
Front End Planning	01-Jan-16 A	13-Nov-26
Construction	31-Mar-25	06-Aug-32
IPCC	15-Nov-28	18-Nov-30
PCC	18-Nov-30	16-Nov-35
CCRLF/AP-3/Monofill	01-Jan-16 A	05-May-64
Site Regulatory	20-Nov-18 A	05-May-64
Front End Planning	01-Jan-16 A	13-Nov-26
Construction/Active/Close&Cap	20-Jul-26	06-Aug-32
IPCC	03-May-32	04-May-34
PCC	05-May-34	04-May-64



Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

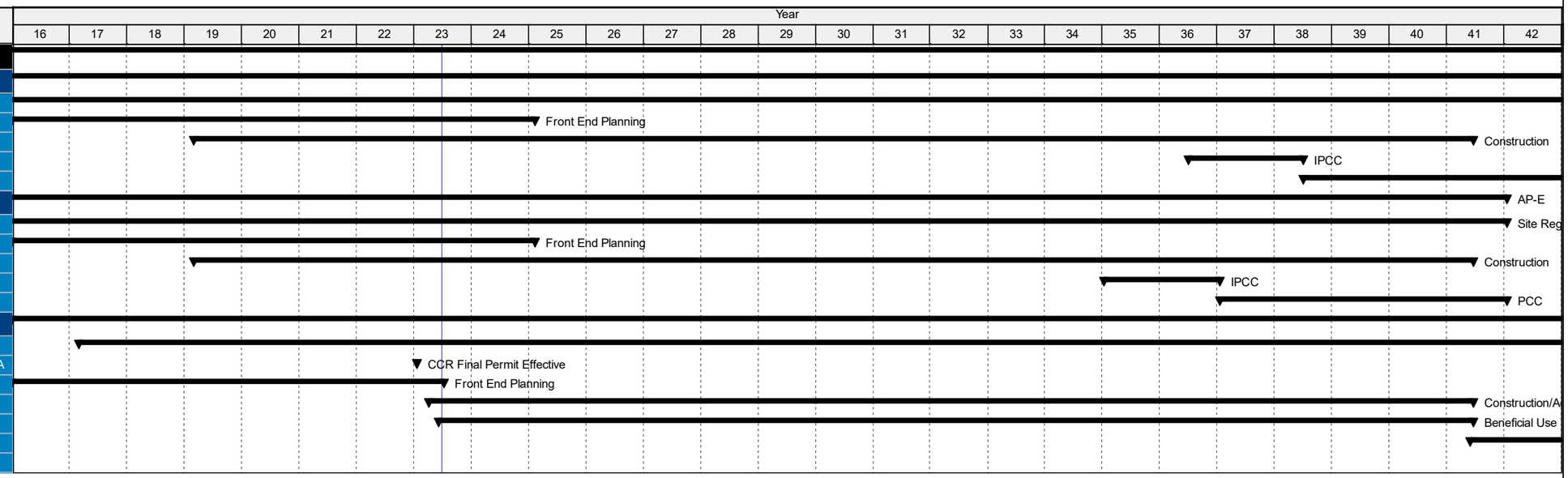
Activity ID	Start	Finish
Bowen CCR	12-May-08 A	01-Jan-72
AP-1	19-Oct-15 A	07-Jul-66
Site Regulatory	19-Oct-15 A	07-Jul-66
CCR Final Permit Effective	17-Feb-22 A	17-Feb-22 A
Front End Planning	01-Jan-16 A	08-Dec-20 A
Construction	14-Dec-17 A	21-Dec-34
IPCC	06-Jul-34	06-Jul-36
PCC	06-Jul-36	07-Jul-66
Bowen 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



Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

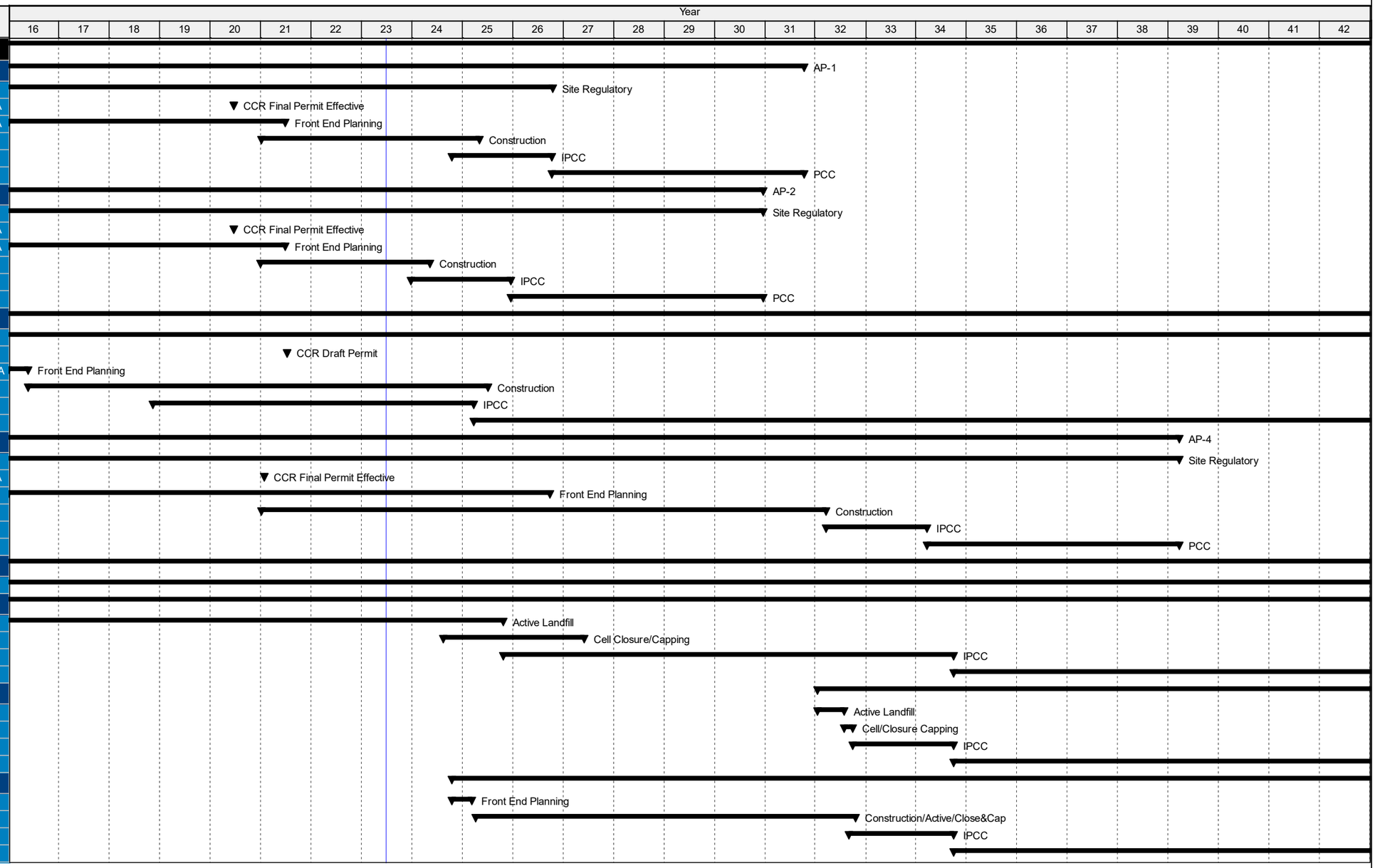
Activity ID	Start	Finish
Branch CCR	19-Oct-15 A	29-May-73
AP-B/AP-C/AP-D	19-Oct-15 A	07-Jul-43
Site Regulatory	19-Oct-15 A	07-Jul-43
Front End Planning	01-Jan-16 A	11-Feb-25
Construction	01-Mar-19 A	18-Jun-41
IPCC	03-Jul-36	02-Jul-38
PCC	06-Jul-38	06-Jul-43
AP-E	19-Oct-15 A	20-Jan-42
Site Regulatory	19-Oct-15 A	20-Jan-42
Front End Planning	01-Jan-16 A	11-Feb-25
Construction	01-Mar-19 A	18-Jun-41
IPCC	15-Jan-35	18-Jan-37
PCC	20-Jan-37	19-Jan-42
Branch LF	01-Jan-16 A	29-May-73
Site Regulatory	28-Feb-17 A	29-May-73
CCR Final Permit Effective	25-Jan-23 A	25-Jan-23 A
Front End Planning	01-Jan-16 A	11-Jul-23
Construction/Active/Close&Cap	10-Apr-23 A	18-Jun-41
Beneficial Use	12-Jun-23 A	18-Jun-41
IPCC	29-May-41	29-May-43
PCC	29-May-43	29-May-73



Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

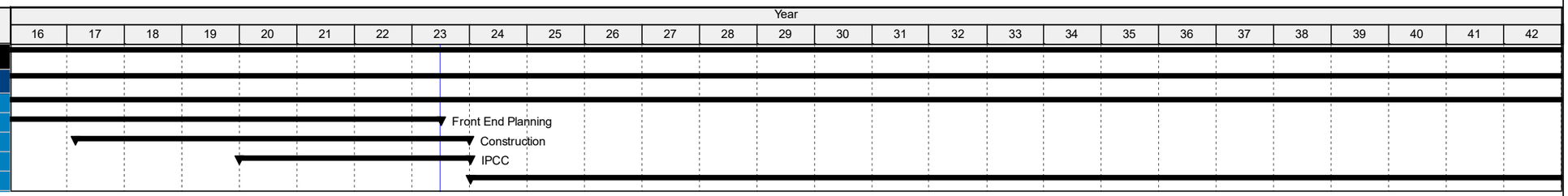
Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

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



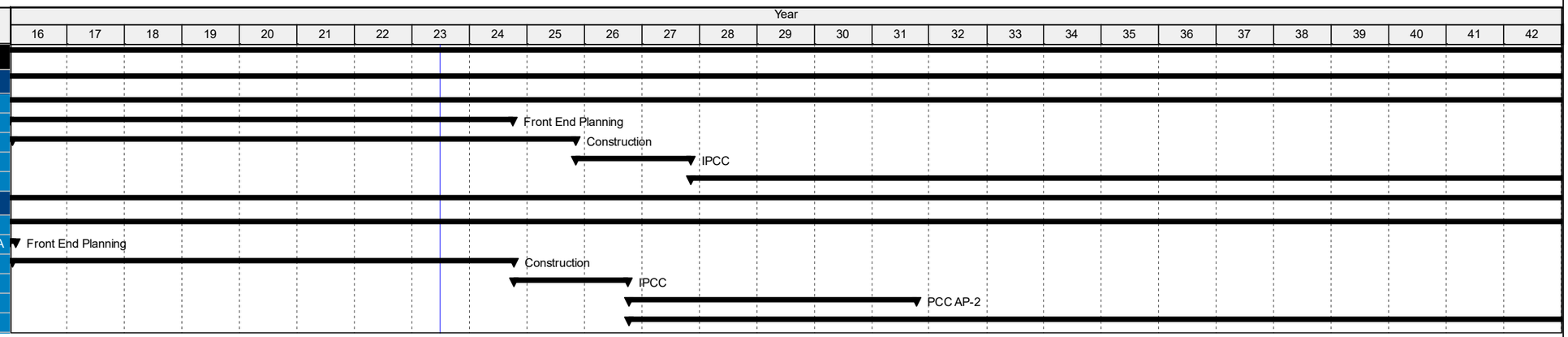
Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

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: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

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

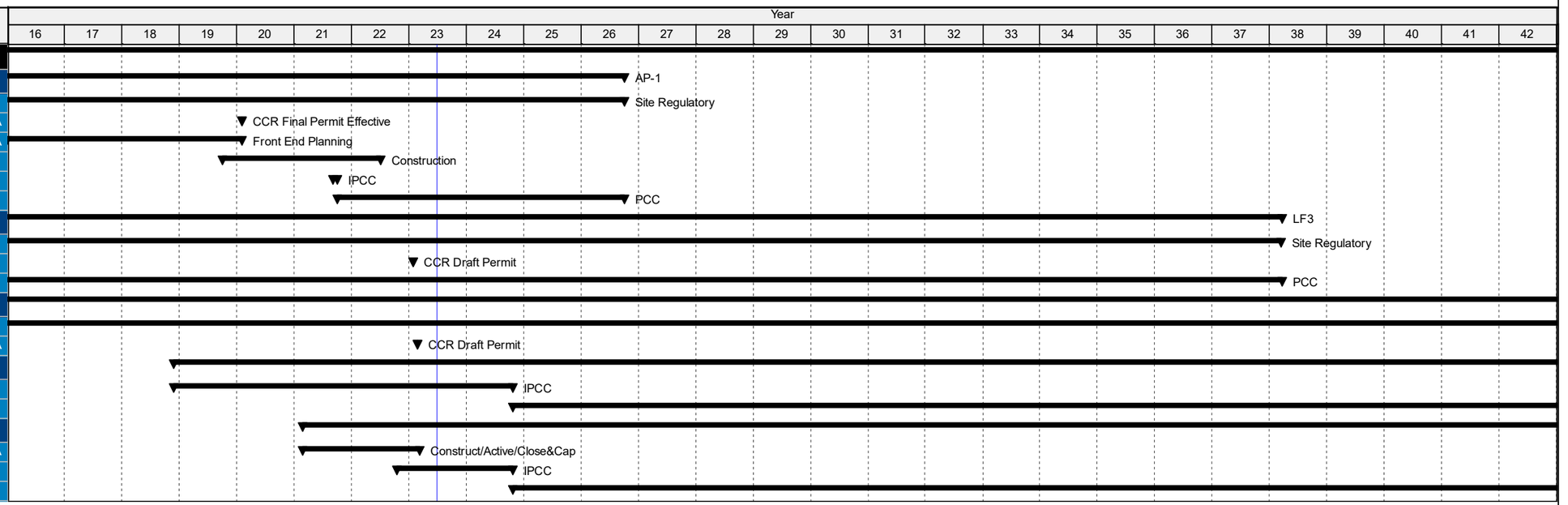


Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

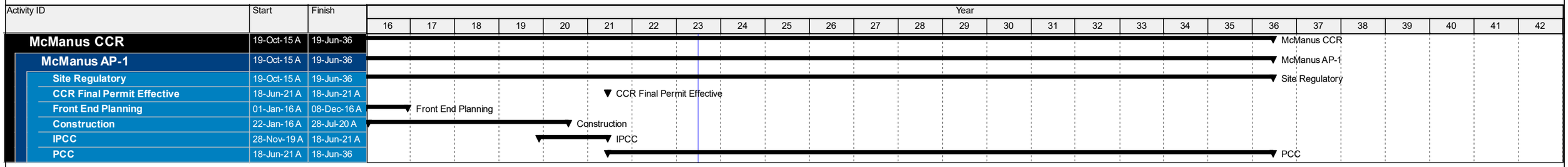
Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

PUBLIC DISCLOSURE

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

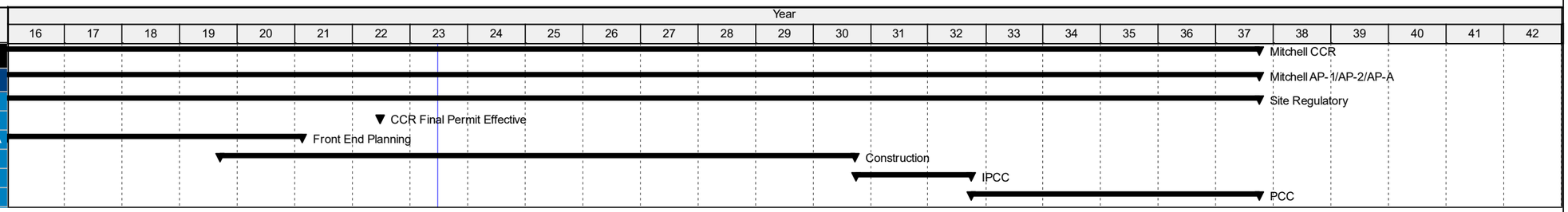


Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

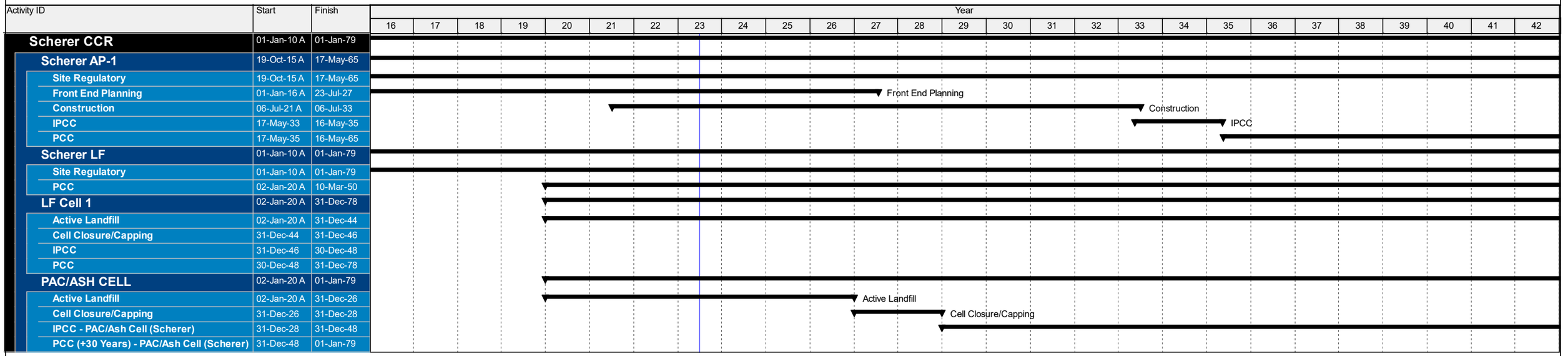


Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

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



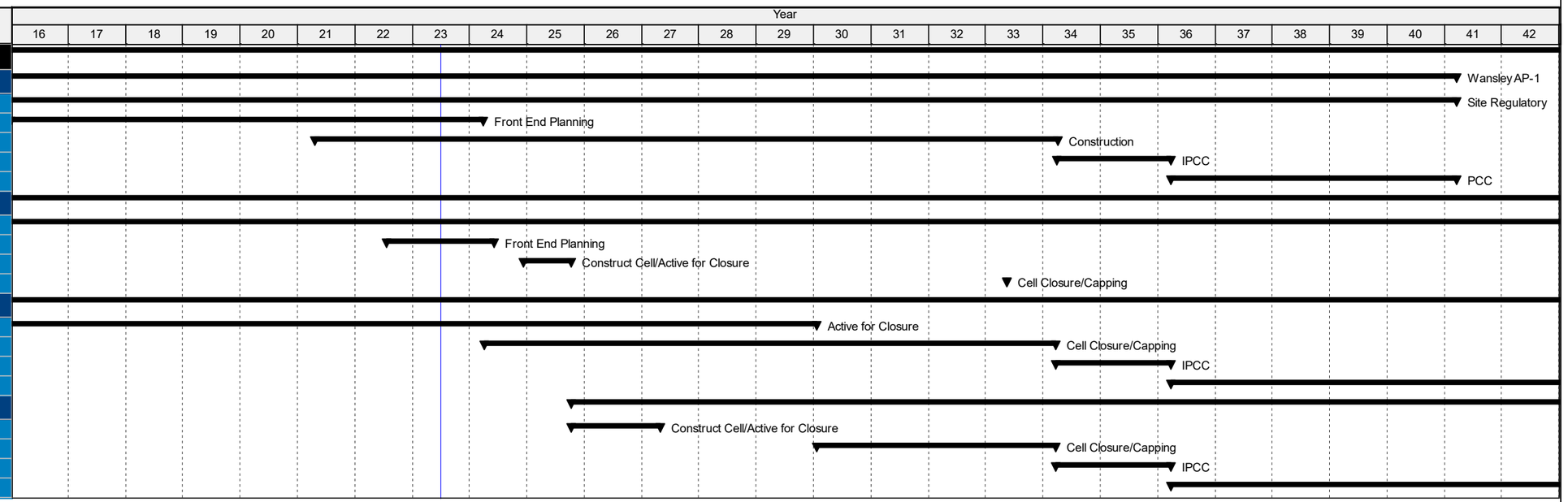
Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.



Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

Activity ID	Start	Finish
Wansley CCR	01-Jan-12 A	14-Feb-66
Wansley AP-1	19-Oct-15 A	23-Mar-41
Site Regulatory	19-Oct-15 A	23-Mar-41
Front End Planning	01-Jan-16 A	27-Mar-24
Construction	19-Apr-21 A	06-Apr-34
IPCC	01-Apr-34	28-Mar-36
PCC	29-Mar-36	22-Mar-41
Wansley Landfill	01-Jan-12 A	14-Feb-66
Site Regulatory	01-Jan-12 A	14-Feb-66
Front End Planning	22-Jul-22 A	03-Jun-24
Construct Cell/Active for Closure	10-Dec-24	08-Oct-25
Cell Closure/Capping	19-May-33	19-May-33
Landfill Cells 1/2/3	01-Jan-12 A	14-Feb-66
Active for Closure	01-Jan-12 A	22-Jan-30
Cell Closure/Capping	08-Apr-24	26-Mar-34
IPCC	26-Mar-34	23-Mar-36
PCC	23-Mar-36	14-Feb-66
Landfill Cell 4	08-Oct-25	14-Feb-66
Construct Cell/Active for Closure	08-Oct-25	28-Apr-27
Cell Closure/Capping	21-Jan-30	26-Mar-34
IPCC	26-Mar-34	23-Mar-36
PCC	23-Mar-36	14-Feb-66

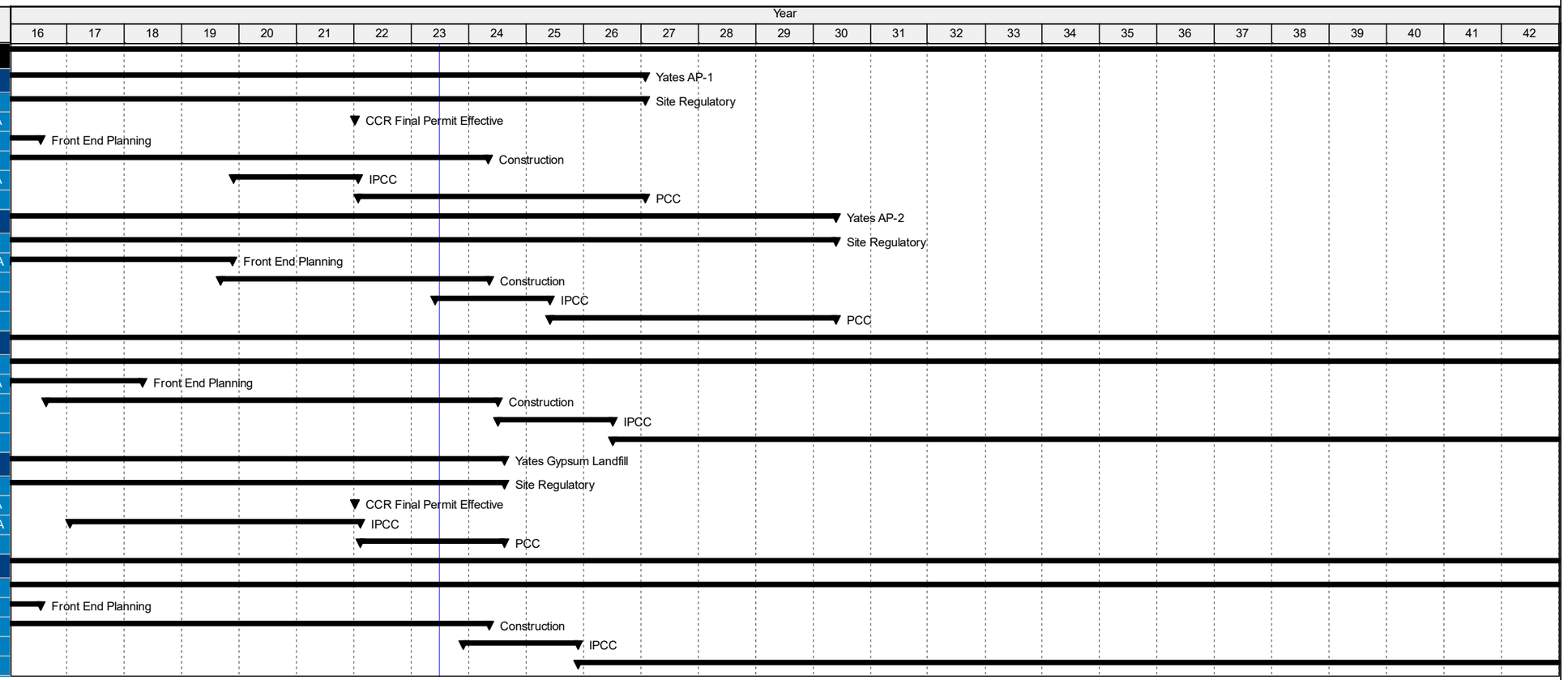


Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

PUBLIC DISCLOSURE

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: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

IX. APPENDIX C

Financial Summary - CCR Unit Level

The cost summaries include project-to-date actuals through July 31, 2024 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 July 2024*	August - December 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	$ 69.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 69.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 69.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $8.2 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 the balance of 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 July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place with liner	$ 279.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Bowen CCR Landfill	Active landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 279.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 279.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $30.9 million consist primarily of Northstack/Beneficial Use/AP-1 ash excavation and mobilization, Cells 5/6 structural fill and liner, and conveyor design payments. Activities expected during the balance of 2024 include continued Northstack/Beneficial Use/AP-1 ash excavation.

Branch

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 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	$ 24.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-C	Closure by removal to permitted landfill	$ 29.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-D	Closure by removal to permitted landfill	$ 18.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-E	Closure by removal to permitted landfill	$ 155.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ 0.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 228.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 228.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $36.7 million consist primarily of on-going water management/dewatering, landfill construction, and beneficial use facility design, procurement, and construction. Activities expected during the balance of 2024 include continuation of the landfill construction, beneficial use facility construction, and the start of the equalization pond scope.

Hammond

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 35.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill	$ 46.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 26.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Closure by removal to permitted landfill	$ 31.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Huffaker Road CCB Facility	Closure in place	$ 12.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 152.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 152.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $14.1 million consist primarily of continued AP-1 and AP-2 ash excavation activities, along with front end planning activities for AP-4. Activities expected during the balance of 2024 include continued ash excavation in AP-1 and starting restoration activities in AP-2 along with continued front end planning activities in AP-4.

Kraft

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 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	$ 20.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 29.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 29.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $2.3 million consist primarily of site maintenance, continued groundwater monitoring and associated oversight, and program management. Activities expected during the balance of 2024 include continued site maintenance, groundwater monitoring and associated oversight, 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 July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place	$ 34.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 18.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 43.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Advanced closure in place	$ 55.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 151.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 151.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $6.7 million consist primarily of water treatment, sitework maintenance, maintenance of engineered turf sand on AP-1 , AP-3 roadwork mobilization, construction indirects, program management, project management and project support. Activities expected during the balance of 2024 include AP-3 roadwork excavation, water treatment, construction indirects, program management, project management and project support.

McIntosh

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 22.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 3	Closure in place	$ 3.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 4	Closure in place	$ 9.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 35.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 35.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $1.2 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 July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 109.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 109.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 109.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $0.8 million consist primarily of groundwater monitoring, pond dike maintenance, and associated oversight. Activities expected during the balance of 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 July 2024*	August - December 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	$ 2.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-1	Closure by removal to permitted landfill and beneficial reuse	$ 66.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill and beneficial reuse	$ 78.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 147.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 147.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $18.2 million consist primarily of 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 the balance of 2024 include completion of excavation and start of final conditioning for AP-2 as well as start of excavation of AP-1 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 July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place	$ 23.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Active landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 23.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 23.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $3 million consist primarily of completion of the Pre Stage 0 Scope of Work and the start of Westech Water Treatment activities. Activities expected during the balance of 2024 include Westech Water Treatment and the mobilization of 0-2 Contractor and start of ash movement activities.

Wansley

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal	$ 47.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 47.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 47.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $12.9 million consist primarily of mobilization of the Prime Contractor, Clearing and Grubbing, Importing Sand, Water Treatment, Gypsum Beneficial Use, Program and Project Management/Project Support. Activities expected during the balance of 2024 include Haul Road Clearing and Grubbing, Stream Culvert, Gypsum Beneficial Use, Instrumentation Implementation, Pond Prep and begin Landfill Liner Full Replacements.

Yates

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal	$ 17.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 122.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 91.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-A	Closure by removal	$ 17.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B	Closure by removal	$ 17.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B'	Advanced closure in place	$ 14.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Gypsum Landfill	Inactive landfill / closure by removal to permitted landfill and beneficial reuse	$ 34.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
R6 Landfill	Inactive landfill / closure in place	$ 4.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
		$ 319.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

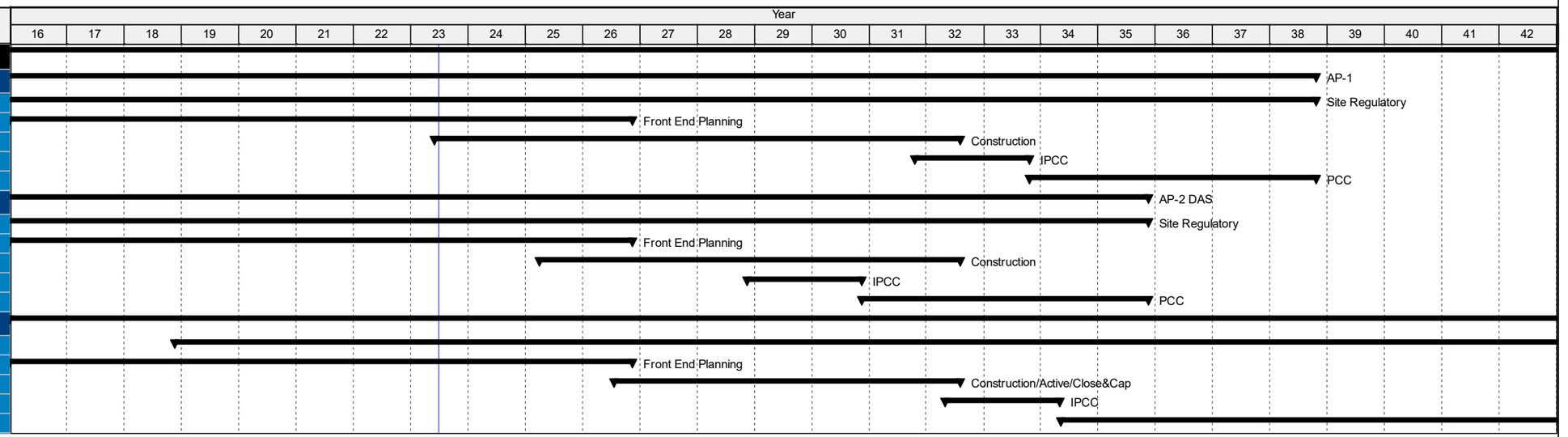
***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

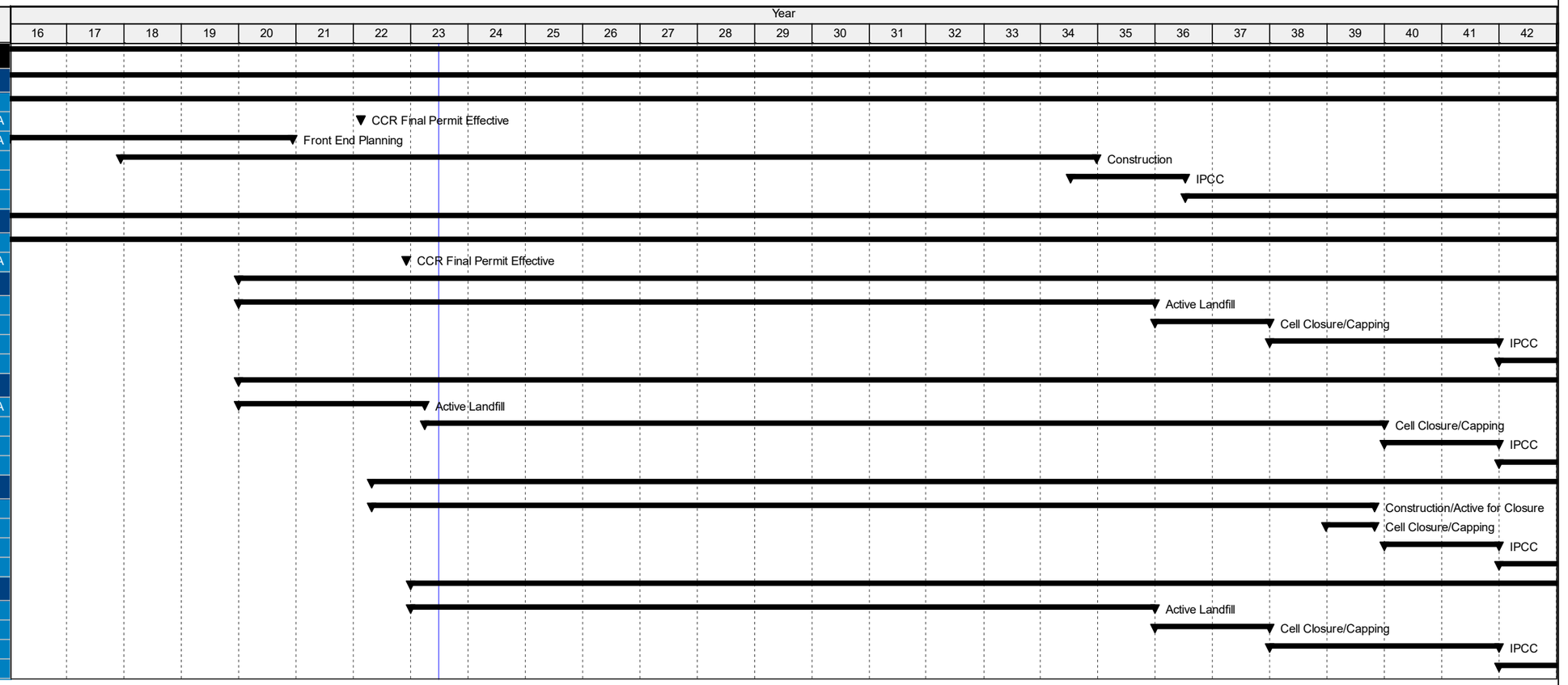
2024 actuals through July of $11.1 million consist primarily of completing the Cap and Cover. Relocation of the Auxiliary spillways and extend Shared Stormwater Infrastructure Ditch (SSID), AMA Low Point assistance and ballasted the Security Fence at C-Pond. Activities expected during the balance of 2024 include regrade of Ash Managment Area (AMA) Parameter Road, replace/relocate AMA Culvert, backfill B-Pond (redesign), Advanced Engineering Measure (AEM) Pump Test, Boral Building Demo and CCR Removal under Boral Building.

Activity ID	Start	Finish
Arkwright CCR	19-Oct-15 A	05-May-64
AP-1	19-Oct-15 A	19-Oct-38
Site Regulatory	19-Oct-15 A	19-Oct-38
Front End Planning	01-Jan-16 A	16-Nov-26
Construction	01-Jun-23 A	06-Aug-32
IPCC	20-Oct-31	19-Oct-33
PCC	19-Oct-33	19-Oct-38
AP-2 DAS	19-Oct-15 A	16-Nov-35
Site Regulatory	19-Oct-15 A	16-Nov-35
Front End Planning	01-Jan-16 A	13-Nov-26
Construction	31-Mar-25	06-Aug-32
IPCC	15-Nov-28	18-Nov-30
PCC	18-Nov-30	16-Nov-35
CCRLF/AP-3/Monofill	01-Jan-16 A	05-May-64
Site Regulatory	20-Nov-18 A	05-May-64
Front End Planning	01-Jan-16 A	13-Nov-26
Construction/Active/Close&Cap	20-Jul-26	06-Aug-32
IPCC	03-May-32	04-May-34
PCC	05-May-34	04-May-64



Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

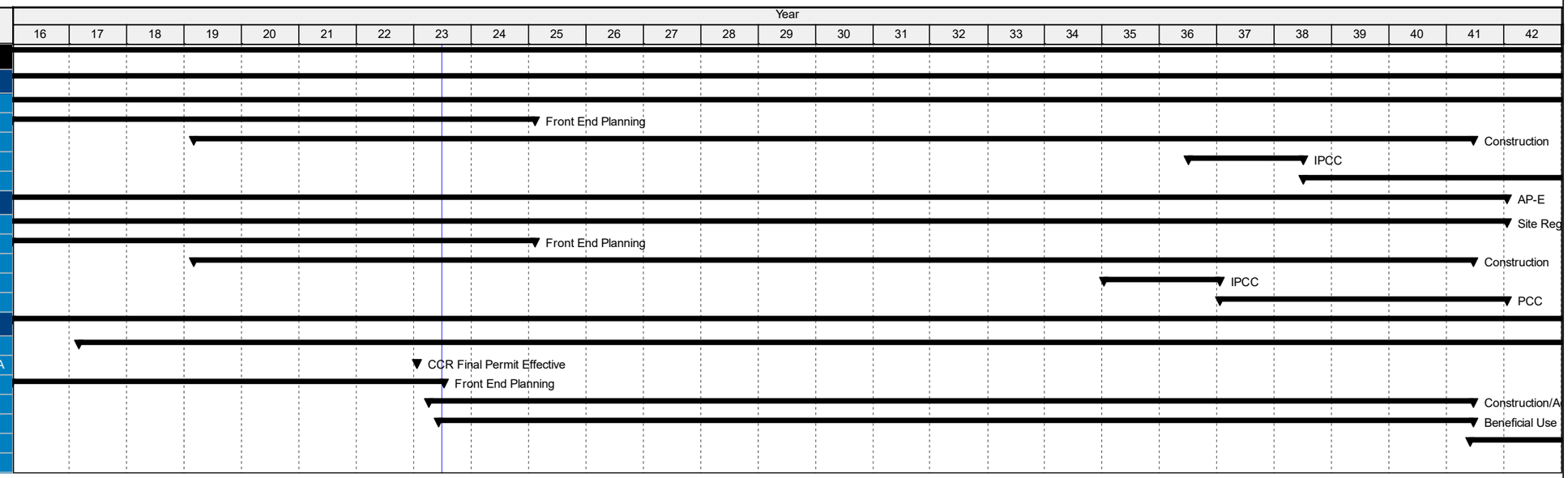
Activity ID	Start	Finish
Bowen CCR	12-May-08 A	01-Jan-72
AP-1	19-Oct-15 A	07-Jul-66
Site Regulatory	19-Oct-15 A	07-Jul-66
CCR Final Permit Effective	17-Feb-22 A	17-Feb-22 A
Front End Planning	01-Jan-16 A	08-Dec-20 A
Construction	14-Dec-17 A	21-Dec-34
IPCC	06-Jul-34	06-Jul-36
PCC	06-Jul-36	07-Jul-66
Bowen 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



Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

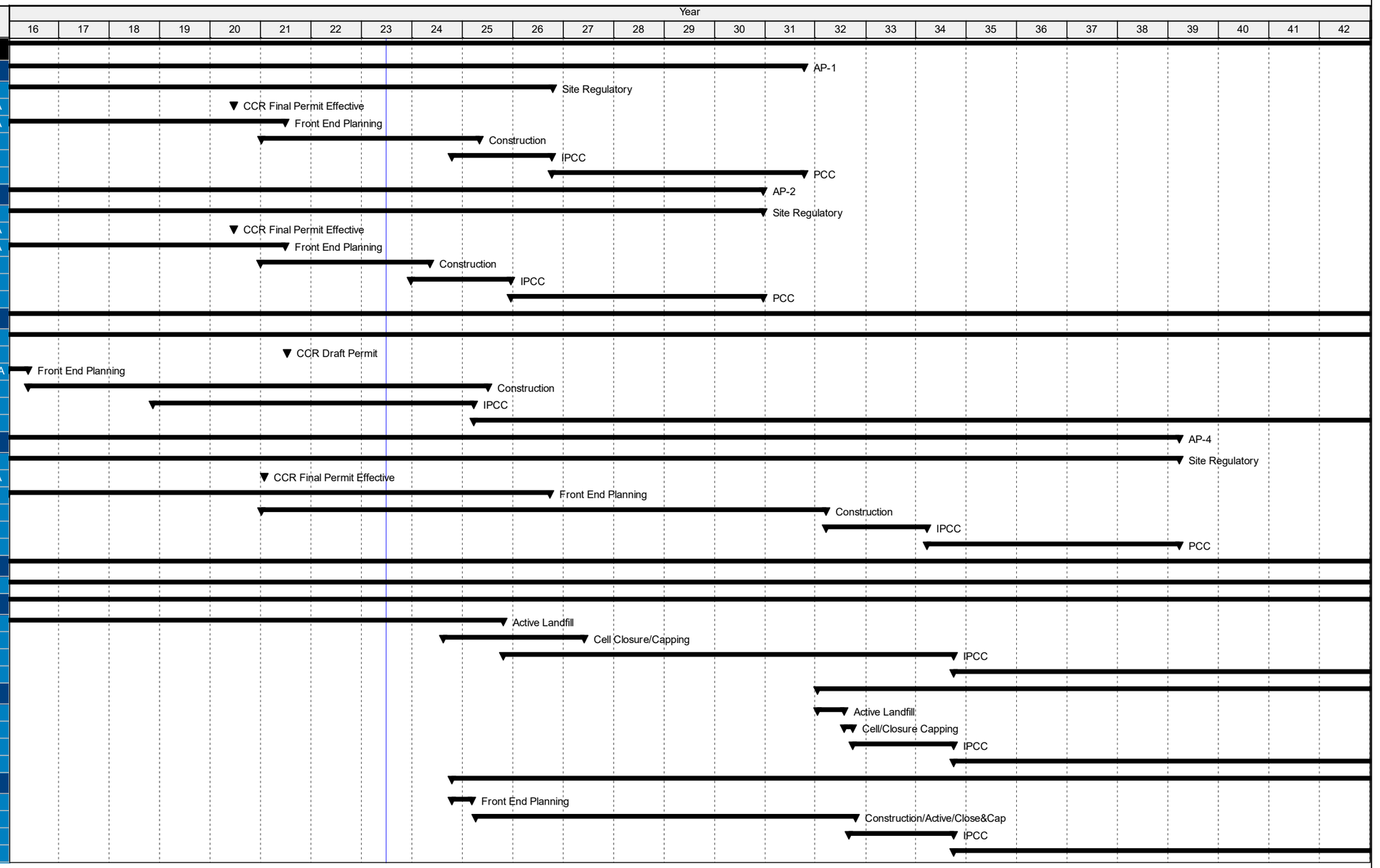
Activity ID	Start	Finish
Branch CCR	19-Oct-15 A	29-May-73
AP-B/AP-C/AP-D	19-Oct-15 A	07-Jul-43
Site Regulatory	19-Oct-15 A	07-Jul-43
Front End Planning	01-Jan-16 A	11-Feb-25
Construction	01-Mar-19 A	18-Jun-41
IPCC	03-Jul-36	02-Jul-38
PCC	06-Jul-38	06-Jul-43
AP-E	19-Oct-15 A	20-Jan-42
Site Regulatory	19-Oct-15 A	20-Jan-42
Front End Planning	01-Jan-16 A	11-Feb-25
Construction	01-Mar-19 A	18-Jun-41
IPCC	15-Jan-35	18-Jan-37
PCC	20-Jan-37	19-Jan-42
Branch LF	01-Jan-16 A	29-May-73
Site Regulatory	28-Feb-17 A	29-May-73
CCR Final Permit Effective	25-Jan-23 A	25-Jan-23 A
Front End Planning	01-Jan-16 A	11-Jul-23
Construction/Active/Close&Cap	10-Apr-23 A	18-Jun-41
Beneficial Use	12-Jun-23 A	18-Jun-41
IPCC	29-May-41	29-May-43
PCC	29-May-43	29-May-73



Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

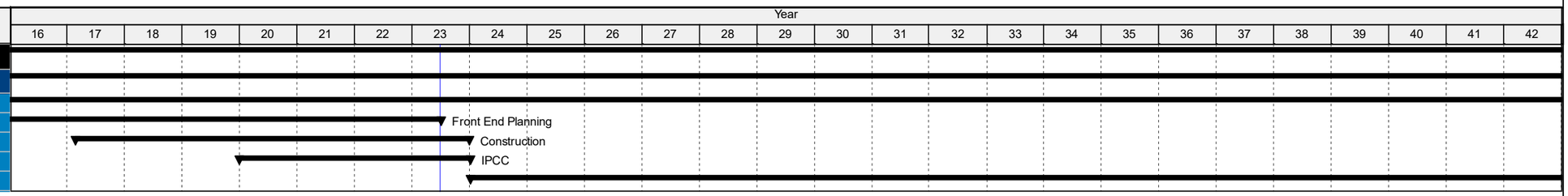
Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

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



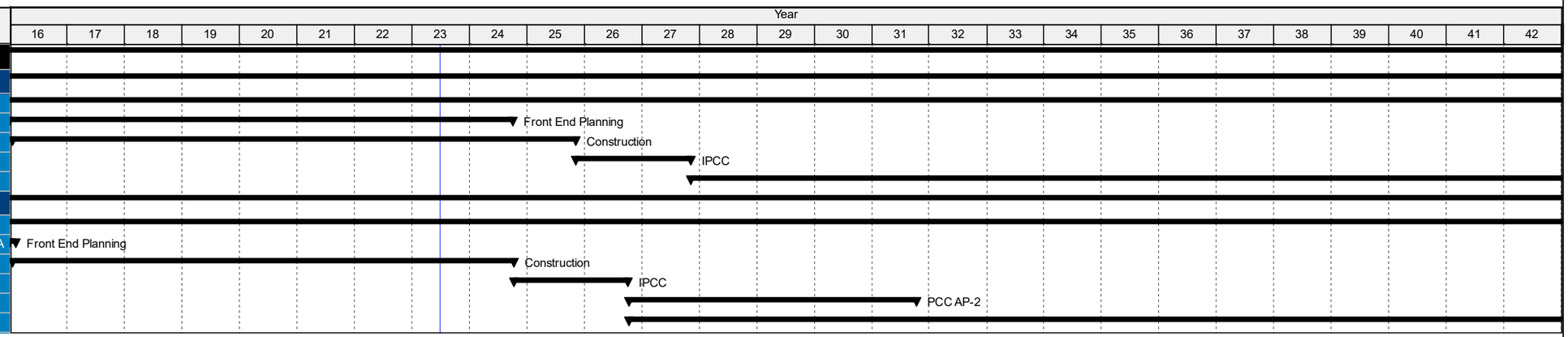
Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

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: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

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

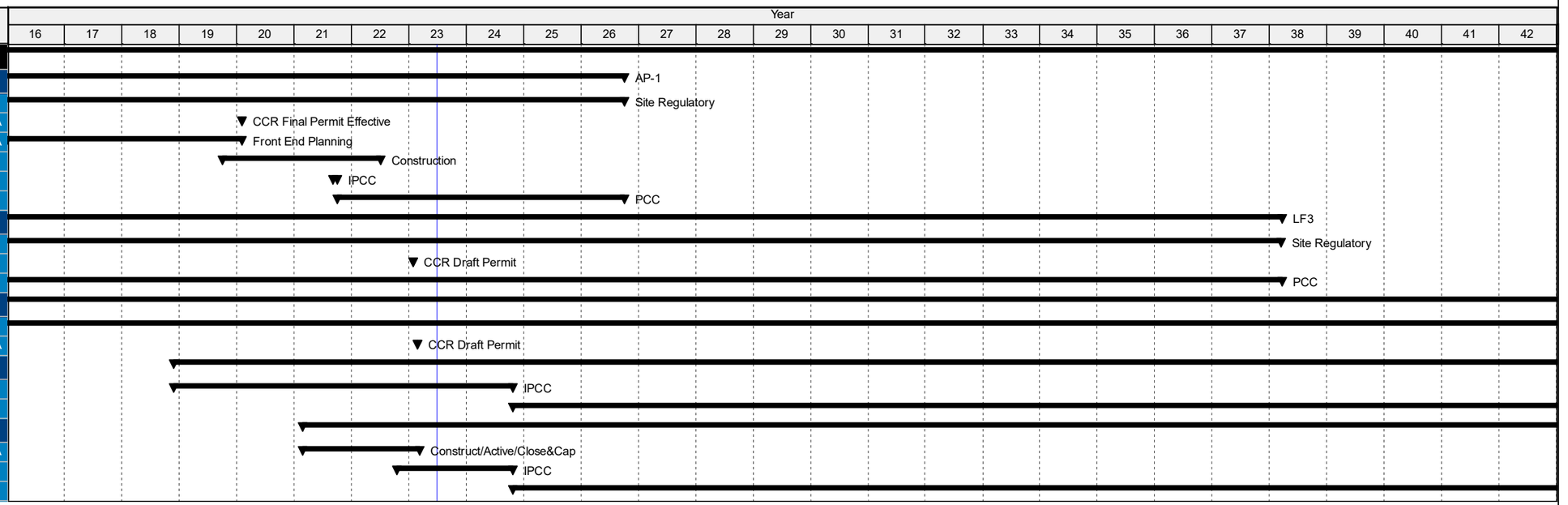


Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

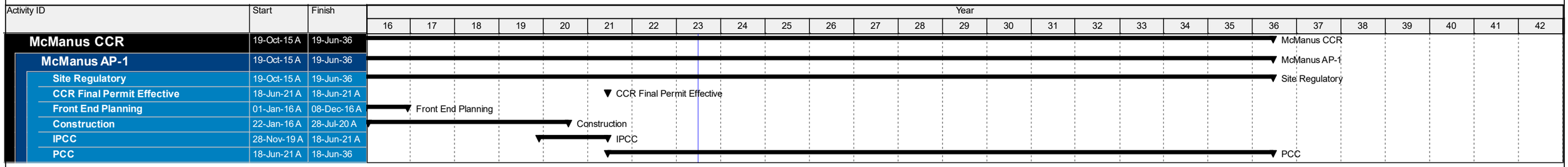
Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

PUBLIC DISCLOSURE

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

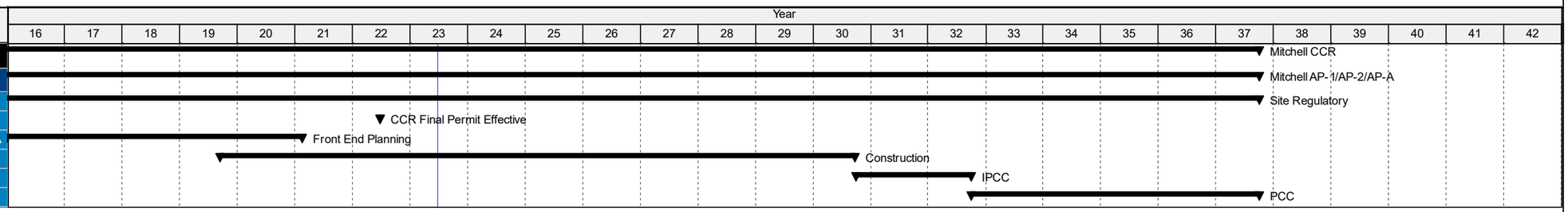


Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

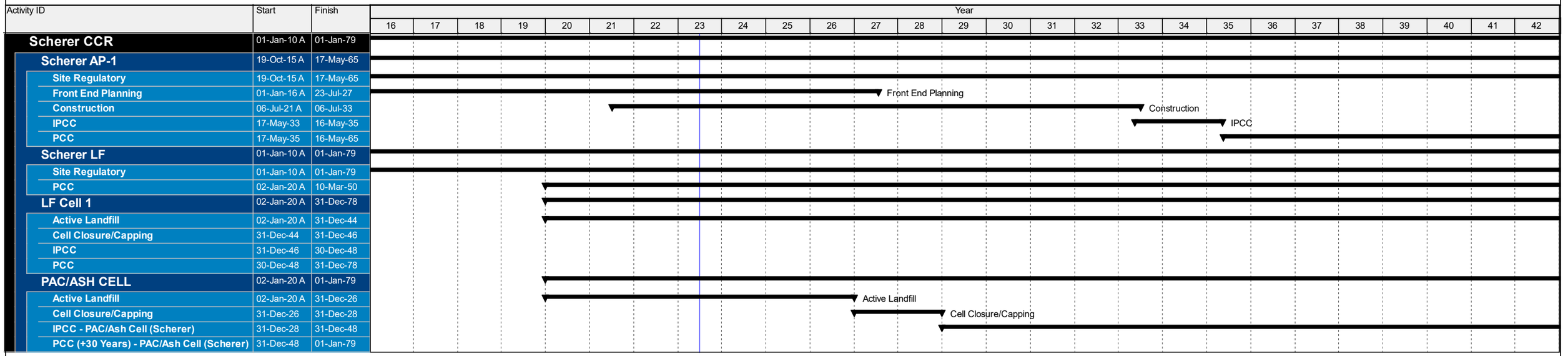


Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

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



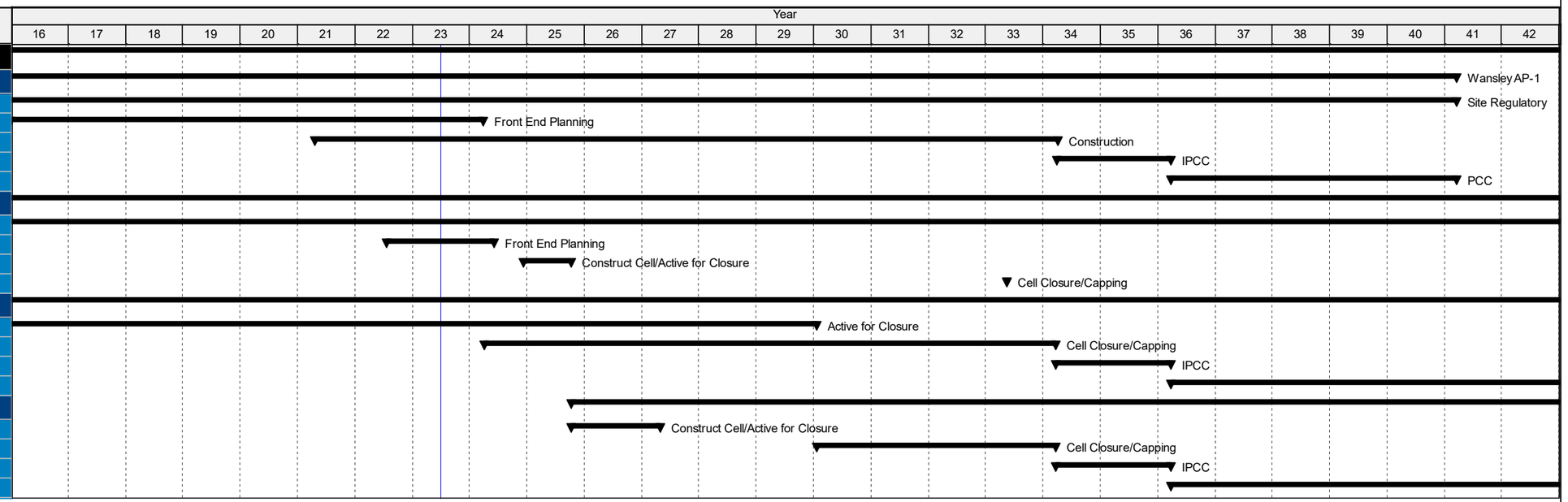
Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.



Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

Activity ID	Start	Finish
Wansley CCR	01-Jan-12 A	14-Feb-66
Wansley AP-1	19-Oct-15 A	23-Mar-41
Site Regulatory	19-Oct-15 A	23-Mar-41
Front End Planning	01-Jan-16 A	27-Mar-24
Construction	19-Apr-21 A	06-Apr-34
IPCC	01-Apr-34	28-Mar-36
PCC	29-Mar-36	22-Mar-41
Wansley Landfill	01-Jan-12 A	14-Feb-66
Site Regulatory	01-Jan-12 A	14-Feb-66
Front End Planning	22-Jul-22 A	03-Jun-24
Construct Cell/Active for Closure	10-Dec-24	08-Oct-25
Cell Closure/Capping	19-May-33	19-May-33
Landfill Cells 1/2/3	01-Jan-12 A	14-Feb-66
Active for Closure	01-Jan-12 A	22-Jan-30
Cell Closure/Capping	08-Apr-24	26-Mar-34
IPCC	26-Mar-34	23-Mar-36
PCC	23-Mar-36	14-Feb-66
Landfill Cell 4	08-Oct-25	14-Feb-66
Construct Cell/Active for Closure	08-Oct-25	28-Apr-27
Cell Closure/Capping	21-Jan-30	26-Mar-34
IPCC	26-Mar-34	23-Mar-36
PCC	23-Mar-36	14-Feb-66

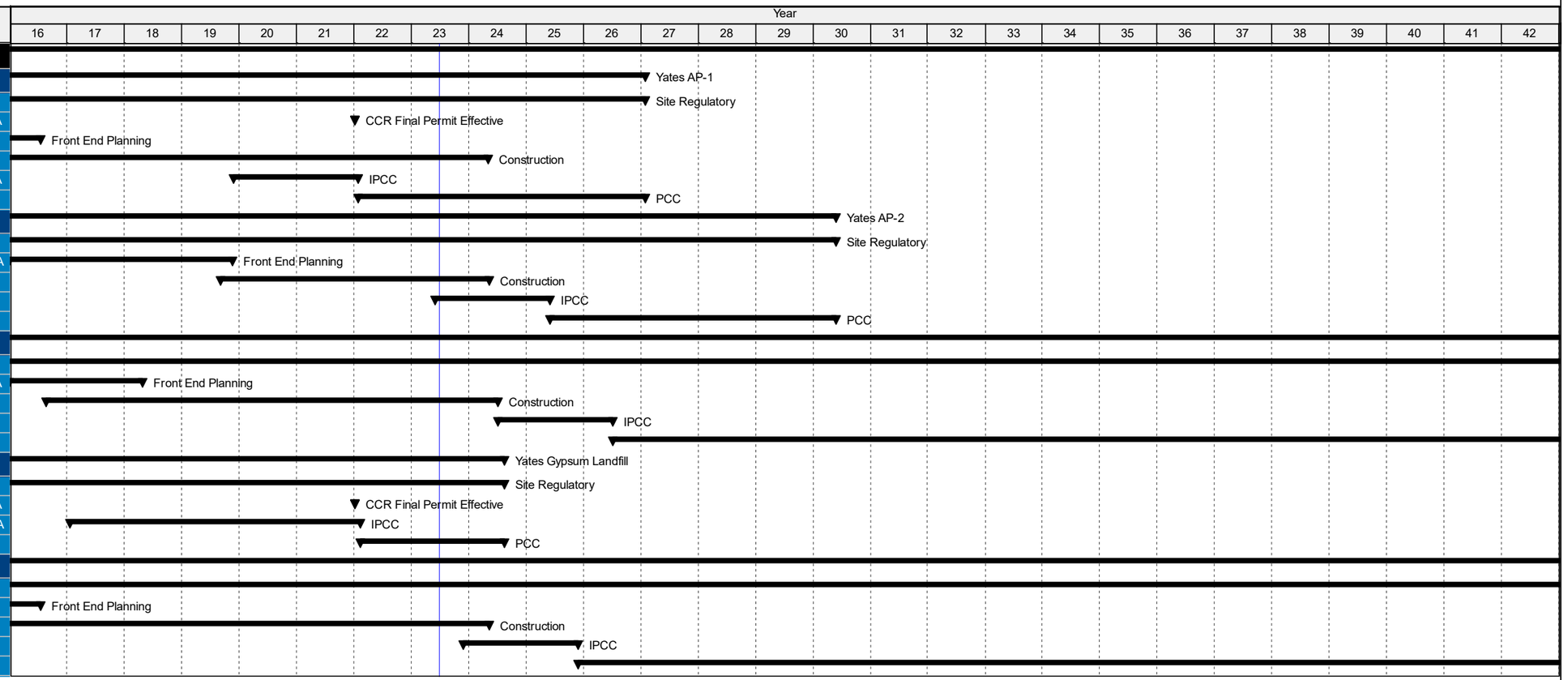


Note: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

Ash Pond Closure Portfolio - 1Q24
Gantt Chart by Plant

PUBLIC DISCLOSURE

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: This schedule forecast is consistent with the March 2024 GPC CCR ARO Semi-Annual Program Status Report; the Company is currently reviewing all years in its CCR ARO estimates and will update in the next CCR ARO semi-annual report.

Arkwright

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 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	$ 69.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 69.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 69.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $8.2 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 the balance of 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 July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place with liner	$ 279.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Bowen CCR Landfill	Active landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 279.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 279.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $30.9 million consist primarily of Northstack/Beneficial Use/AP-1 ash excavation and mobilization, Cells 5/6 structural fill and liner, and conveyor design payments. Activities expected during the balance of 2024 include continued Northstack/Beneficial Use/AP-1 ash excavation.

Branch

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 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	$ 24.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-C	Closure by removal to permitted landfill	$ 29.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-D	Closure by removal to permitted landfill	$ 18.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-E	Closure by removal to permitted landfill	$ 155.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ 0.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 228.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 228.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $36.7 million consist primarily of on-going water management/dewatering, landfill construction, and beneficial use facility design, procurement, and construction. Activities expected during the balance of 2024 include continuation of the landfill construction, beneficial use facility construction, and the start of the equalization pond scope.

Hammond

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 35.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill	$ 46.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 26.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Closure by removal to permitted landfill	$ 31.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Huffaker Road CCB Facility	Closure in place	$ 12.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 152.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 152.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $14.1 million consist primarily of continued AP-1 and AP-2 ash excavation activities, along with front end planning activities for AP-4. Activities expected during the balance of 2024 include continued ash excavation in AP-1 and starting restoration activities in AP-2 along with continued front end planning activities in AP-4.

Kraft

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 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	$ 20.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 29.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 29.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $2.3 million consist primarily of site maintenance, continued groundwater monitoring and associated oversight, and program management. Activities expected during the balance of 2024 include continued site maintenance, groundwater monitoring and associated oversight, 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 July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place	$ 34.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 18.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 43.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Advanced closure in place	$ 55.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 151.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 151.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $6.7 million consist primarily of water treatment, sitework maintenance, maintenance of engineered turf sand on AP-1 , AP-3 roadwork mobilization, construction indirects, program management, project management and project support. Activities expected during the balance of 2024 include AP-3 roadwork excavation, water treatment, construction indirects, program management, project management and project support.

McIntosh

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 22.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 3	Closure in place	$ 3.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 4	Closure in place	$ 9.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 35.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 35.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $1.2 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 July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 109.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 109.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 109.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $0.8 million consist primarily of groundwater monitoring, pond dike maintenance, and associated oversight. Activities expected during the balance of 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 July 2024*	August - December 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	$ 2.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-1	Closure by removal to permitted landfill and beneficial reuse	$ 66.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill and beneficial reuse	$ 78.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 147.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 147.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $18.2 million consist primarily of 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 the balance of 2024 include completion of excavation and start of final conditioning for AP-2 as well as start of excavation of AP-1 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 July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Advanced closure in place	$ 23.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Active landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 23.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 23.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $3 million consist primarily of completion of the Pre Stage 0 Scope of Work and the start of Westech Water Treatment activities. Activities expected during the balance of 2024 include Westech Water Treatment and the mobilization of 0-2 Contractor and start of ash movement activities.

Wansley

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal	$ 47.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 47.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	$ 47.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $12.9 million consist primarily of mobilization of the Prime Contractor, Clearing and Grubbing, Importing Sand, Water Treatment, Gypsum Beneficial Use, Program and Project Management/Project Support. Activities expected during the balance of 2024 include Haul Road Clearing and Grubbing, Stream Culvert, Gypsum Beneficial Use, Instrumentation Implementation, Pond Prep and begin Landfill Liner Full Replacements.

Yates

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2024*	August - December 2024 Forecast**	2025 Forecast	2026-2028 Forecast	2029-2031 Forecast	2032-2079 Forecast	Total
AP-1	Closure by removal	$ 17.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 122.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 91.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-A	Closure by removal	$ 17.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B	Closure by removal	$ 17.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B'	Advanced closure in place	$ 14.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Gypsum Landfill	Inactive landfill / closure by removal to permitted landfill and beneficial reuse	$ 34.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
R6 Landfill	Inactive landfill / closure in place	$ 4.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
		$ 319.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

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 July 2024*	August - December 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	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2024*

***The 2024 annual forecast is consistent with the Company's March 2024 Semi-Annual Status Report. The Company is currently reviewing all years in its CCR ARO estimates and expects updates by year-end for all projects.*

Note: Details may not add to totals due to rounding

Notes:

2024 actuals through July of $11.1 million consist primarily of completing the Cap and Cover. Relocation of the Auxiliary spillways and extend Shared Stormwater Infrastructure Ditch (SSID), AMA Low Point assistance and ballasted the Security Fence at C-Pond. Activities expected during the balance of 2024 include regrade of Ash Managment Area (AMA) Parameter Road, replace/relocate AMA Culvert, backfill B-Pond (redesign), Advanced Engineering Measure (AEM) Pump Test, Boral Building Demo and CCR Removal under Boral Building.