Georgia Power

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PUBLIC DISCLOSURE

March 14, 2025

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

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

Dear Ms. Tanner:

Enclosed for filing in compliance with the Georgia Public Service Commission's ("Commission") July 29, 2019, Order Adopting Stipulation as Amended in Docket No. 42310 ("2019 IRP Final Order") as well as the Commission's July 29, 2022, Order Adopting Stipulation in Docket No. 44160 ("2022 IRP Final Order") is Georgia Power Company's (the "Company") Semi-Annual CCR ARO Report ("Report"). The Company files this Report to update the Commission on the Company's CCR ARO compliance strategy activities through December 31, 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 Hiren Patel at 404-506-6929.

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.

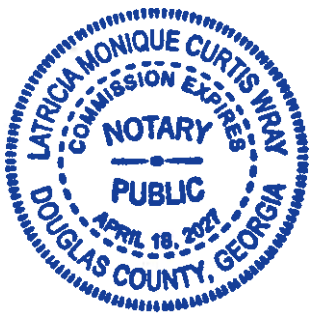
Robert W Mitchell III, first being duly sworn, deposes and states that he has reviewed the Report and that, to the best of his knowledge, the specific information designated as trade secret therein constitutes trade secrets pursuant to Article 27, Chapter 1, Title 10 of the Georgia Code.

Robert W Mitchell III
CCR PMO Director
Georgia Power Company

Subscribed and sworn to before me this 13th day of March 2025.

Notary Public

My Commission expires:



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

Georgia Power Company

March 14, 2025

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, 2024, and subsequent securities filings, could cause actual results to differ materially from management expectations as suggested by such forward-looking information: the impact of recent and future federal and state regulatory changes, including tax, environmental, and other laws and regulations to which Georgia Power is subject, as well as changes in application of existing laws and regulations; the extent and timing of costs and legal requirements related to coal combustion residuals; current and future litigation or regulatory investigations, proceedings, or inquiries; the ability to control costs and avoid cost and schedule overruns during the development, construction and operation of facilities or other projects; the ability to construct facilities in accordance with the requirements of permits and licenses and to satisfy any environmental performance standards and the requirements of tax credits and other incentives; advances in technology; state and federal rate regulations and the impact of pending and future rate cases and negotiations, including rate actions relating to cost recovery mechanisms; catastrophic events such as fires, earthquakes, explosions, floods, tornadoes, hurricanes and other storms, droughts, pandemic health events, political unrest, wars, or other similar occurrences; and the effect of accounting pronouncements issued periodically by standard-setting bodies. Georgia Power expressly disclaims any obligation to update any forward-looking information.

Georgia Power Company
Coal Combustion Residuals Asset Retirement Obligation Program
Semi-Annual Program Status Report
March 14, 2025

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Georgia Power Company
Coal Combustion Residuals Asset Retirement Obligation Program
Semi-Annual Program Status Report
March 14, 2025

In accordance with the Georgia Public Service Commission's ("PSC" or the "Commission") Final Order in the 2019 Integrated Resource Plan ("IRP") proceeding in Docket No. 42310 and Final Order in the 2022 IRP proceeding in Docket No. 44160, Georgia Power Company ("Georgia Power", "GPC", or the "Company") provides this semi-annual report under the designated Docket No. 43083, regarding the Asset Retirement Obligations ("ARO") for its Coal Combustion Residuals ("CCR") compliance strategy activities through December 31, 2024 and other notable updates.

I. EXECUTIVE SUMMARY

Georgia Power is continuing progress on the ash pond ("AP") closure and CCR landfill ("LF") projects at locations across the state as detailed in Section III. Since the October 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.

A total of 18 final permits have been issued to date. The final permit for Wansley AP-1 was received from EPD in March 2025.

In November 2024, EPD accepted the Decontamination Certification for Yates Gypsum Landfill and issued a release from its CCR Permit that went into effect immediately. This permit release confirms that all CCR obligations for the former CCR landfill have been fulfilled.

The Company has begun the permit renewal process that occurs every five years for final permits issued with EPD. Three permit renewals were submitted to EPD and one approved in 2024.

Project Updates: Hammond AP-2 has entered Post Closure Care ("PCC"). A certification of removal was filed with EPD and acknowledged by EPD.

Beneficial Use: Beneficial use efforts continue at Georgia Power facilities including Plants Bowen, Branch, and Mitchell with over 400,000 tons of ash beneficiated in 2024. 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. The ash from Plant Arkwright will be trucked to the permitted landfill at Plant Branch for potential beneficial use to be processed through the Plant Branch beneficial use facility.

In the first year of operations, the Bowen beneficial use facility has processed less ash than projected, however, these reduced sales have been offset by the higher-than-expected market price for each ton of ash sold. System enhancements to meet production projections at the Bowen beneficial use facility are currently being evaluated and implemented by the beneficial use contractor.

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 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.

Regulatory Impacts – Legacy Rule: In 2024, EPA expanded the reach of the federal CCR rule to encompass legacy surface impoundments ("legacy SI") and other accumulations of CCR in the amendments to the CCR Rule, known as the CCR Legacy Rule. The CCR Legacy Rule is expected to have limited impact on Georgia Power CCR units that fit under the legacy surface impoundments definition because the Georgia CCR Rule, finalized in 2016, was more stringent than the 2015 federal rule regulating legacy units with similar requirements. Although previously exempt from federal regulation, Georgia Power's legacy SIs have all been regulated under Georgia EPD's CCR permitting program, previous state landfill permits, and/or state remediation programs. These units were or are being closed according to stringent standards for the protection of the environment. The finalization of the federal rule, however, subjects these legacy units to duplicative requirements and oversight by both the state and federal agencies. While Georgia's comprehensive CCR, solid waste, and remediation rules have effectively regulated closure of CCR ash ponds and landfills in the state, the EPA's CCR Legacy Rule adds certain additional requirements.

On November 8, 2024, the Company completed applicability reports per the Legacy CCR Surface Impoundment Rule. The applicability report identifies the presence of a legacy SI at an inactive facility. The units identified as legacy SIs include Arkwright AP-1, Arkwright AP-3, Branch AP-A, Branch AP-B, Branch AP-C, Branch AP-D, Branch AP-E, Kraft AP-1, Mitchell AP-1, and Mitchell AP-2.

Regulatory Impacts – ELG Rule: In 2024, the EPA published the final rule revising the Steam Electric Effluent Limitations Guidelines ("ELG"). The new Combustion Residual Leachate ("CRL") requirements will require the addition of treatment systems for leachate collection systems at CCR landfills or closed ash ponds. The Company's environmental compliance strategy ("ECS") for CRL includes capital costs to meet Zero Liquid Discharge ("ZLD") limitations at Plants Bowen and Scherer, as well as ARO estimates for physical chemical treatment at retired facilities with leachate collection systems.

Financial Summary: The fourth quarter 2024 updates included several notable factors, including but not limited to the following:

- The new CRL requirements from the 2024 ELG Supplemental Rule will require the addition of treatment systems for leachate collection systems at CCR landfills or closed ash ponds.
- An increase in future escalation rates as compared to the October semi-annual report for all projects in the portfolio. This is primarily due to an increase in projected commodity prices since the last semi-annual report. Updated cashflow timing also impacted the amount of escalation calculated.

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 $8.0 billion, including approximately

$1.7 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 CCR Landfills ("CCR Units")

	Ash Pond Closure Method			CCR Landfills
	Closure by Removal	Closure in Place	Total	
Arkwright				**3**[A]
Bowen		1	**1**	**1**
Branch	5		**5**	**1**[B]
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**[C]
	20	9	**29**	**12**

[A] *Arkwright landfills are planned to be closure by removals.*
[B] *Branch Landfill currently under construction.*
[C] *Count includes the Yates Gypsum Landfill that was released from its CCR permit on November 25, 2024 and the R6 landfill remains.*

II. PERMITTING

CCR 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.

A total of 18 final permits have been issued to date, see Table 2. The final permit for Wansley AP-1 was received from EPD in March 2025.

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 then takes steps to address EPD's comments, which include working with third-party engineering firms to update groundwater monitoring plans, revise permit documents, and update closure drawings and engineering calculations. While EPD requires the Company to update its permit applications, engineering details, and groundwater monitoring plans, final permits have to date been largely consistent with the closure strategies approved by the Commission and have not resulted in rework.

Table 2: Final Permit Issuance through March 14, 2025

2018	2020	2021	2022	2023	2025
Initial Permit Applications Submitted	McIntosh AP-1	Hammond AP-4	Yates AP-1	Branch LF	Wansley AP-1
	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	
				Yates AP-2	
			Bowen LF	**Hammond AP-3**	
			Wansley LF		

*Note: CCR Units in **bold** denote a final permit issued for a closure-in-place unit. CCR units with an asterisk (*) denote units that have been released from its permit.*

In November 2024, EPD accepted the Decontamination Certification for Yates Gypsum Landfill and issued a release from its CCR Permit and associated post-closure care requirements, which took effect immediately. The Company properly abandoned the groundwater monitoring wells that were part of the Gypsum Landfill's groundwater monitoring network in first quarter of 2025 and an abandonment report will be filed with EPD.

EPD permitting activities are 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. Additionally, the Company has begun the permit renewal process that occurs every five years for final permits issued with EPD. In 2024, a permit renewal was submitted and approved by EPD for McIntosh AP-1 and submitted and currently under review by EPD for Hammond AP-1 and Hammond AP-2.

CCR Legacy Rule Implications

In 2024, EPA expanded the reach of the federal CCR rule to encompass legacy surface impoundments ("legacy SI") and other accumulations of CCR in the amendments to the CCR Rule, known as the CCR Legacy Rule. A legacy CCR surface impoundment is a CCR surface impoundment that no longer receives CCR but contained both CCR and liquids on or after October 19, 2015, and that is located on an inactive electric utility's or independent power producer's site. Coal Combustion Residual Management Unit ("CCRMU") means an area of land in which any noncontainerized accumulation of CCR is received, placed, or otherwise managed, that is not a regulated CCR unit. This does not include roadbed and associated embankments in which CCR is used unless it is determined that the roadbed is causing or contributing to groundwater impacts.

The CCR Legacy Rule is expected to have limited impact on Georgia Power CCR units that fit under the legacy surface impoundments definition because the Georgia CCR Rule, finalized in 2016, was more stringent than the 2015 federal rule regulating legacy units with similar requirements. Although exempt from federal regulation until November 2024, Georgia Power's legacy surface impoundments have all been regulated under Georgia EPD's regulatory programs. These units were or are being closed in accordance with the CCR Rule requirements and are protective of the environment. The finalization of the CCR Legacy Rule, however, subjects these legacy units to duplicative requirements and oversight by both the state and federal agencies. While Georgia's comprehensive CCR, solid waste, and remediation rules have effectively regulated closure of CCR ash ponds and landfills in the state, the EPA's CCR Legacy Rule adds certain additional requirements. The Company has provided additional details in the 2025 ECS Report.

The CCR Legacy Rule required completion of Applicability Reports for all legacy SIs and commencement of compliance obligations such as establishment of operating records and websites, physical inspections and instrumentation monitoring, fugitive dust plans and reporting on or before the November 8, 2024, effective date of the rule. Additional requirements such as installation of permanent identification markers follow this effective date as required by the Rule. The units identified as legacy SIs include Arkwright AP-1, Arkwright AP-3, Branch AP-A, Branch AP-B, Branch AP-C, Branch AP-D, Branch AP-E,

Kraft AP-1, Mitchell AP-1, and Mitchell AP-2. A copy of the associated Applicability Reports has been placed on Georgia Power's external website.

Table 3: Georgia Power's Legacy SI Applicability Reports Filed November 2024

	Legacy Surface Impoundments	Applicability Notes
Arkwright	**2**	Two of the three CCR units at Arkwright are classified as legacy surface impoundments. These units were previously closed as landfills and are identified as such in Georgia.
Branch	**5**	All of the CCR units at Branch are classified as legacy surface impoundments. Branch AP-A - a Closure Certification pursuant to 40 C.F.R. § 257.100(g) was provided with the Applicability Report, serving as the demonstration that Branch AP-A is not subject to any further requirements under the Legacy Rule.
Kraft	**1**	Kraft AP-1 is classified as a legacy surface impoundment. A demonstration for deferral pending a future permitting action under 40 § C.F.R. 257.101(g)(1) through (g)(4) was provided with the Applicability Report. The CCR Legacy Rule may require installation of additional groundwater monitoring wells to reestablish a groundwater monitoring network.
Mitchell	**2**	Two of the three CCR units at Mitchell are classified as legacy surface impoundments.
TOTAL	**10**	

The CCR Legacy Rule also requires facility evaluations at all current and former coal-fired power plant sites to identify the existence of CCRMUs. The Legacy Rule requires a comprehensive Facility Evaluation and Reporting ("FER") in two parts. Any CCRMUs that are identified through the facility evaluation process are required to close in accordance with Legacy CCR Rule requirements. Costs associated with this first round of FER work have been incorporated into the CCR ARO estimate at the site level. Additional costs are expected in order to comply with the second part of the FER analysis which includes a more invasive site investigation. CCR ARO estimates will be updated to include the second part of the FER following part one, when there is a better understanding of the scope of work necessary to meet the requirements.

Other Permitting

EPD recently approved the new National Pollutant Discharge Elimination Permit ("NPDES") Permit for Plant Arkwright that will facilitate dewatering activities that are necessary for the closure of the CCR units as well as other wastewater needs. This permit went into effect on December 1, 2024.

The Company has pursued Individual Permits ("IP") from the United States Army Corps of Engineers ("USACE") for wetland and stream impacts to complete the closure activities at three sites: Plant Wansley, Plant Hammond, and Plant Arkwright. The Company has received an approved IP to complete construction activities required for the landfill expansion at Plant Wansley. Mitigation credits to support this permit were purchased in 2023. In 2023, the Company submitted an application for an IP for the Huffaker Road landfill expansion at Plant Hammond. An updated IP for that work is expected to be submitted in the first quarter of 2025. Mitigation credits for the Huffaker Landfill impacts are expected to be obtained in 2025. Most recently, the Company had a pre-application meeting with USACE in January 2025 to complete the removal of the Arkwright landfills. The IP application is expected to be submitted and mitigation credits obtained in 2025.

The permitting process in Georgia has made it possible for CCR units to continue to be evaluated for support of new generation 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 is ongoing 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, where ash had been removed.

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. As closure construction has advanced, Georgia Power has continued to prioritize safety through comprehensive planning, hazard recognition, engineering controls, training, a behavior-based safety program, and rigorous follow-through with learning events when risks are identified. Site-specific health and safety plans are developed and routinely assessed to minimize risks.

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 2025, 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. Dewatering activities at Plant Scherer began in March 2024, upon the completion of wastewater treatment construction and commissioning activities. Plant Wansley is expected to commence dewatering in the second quarter of 2025, in accordance with their EPD-approved dewatering plan.

The dewatering activities occur under the direction of independent, third-party licensed wastewater treatment plant operators throughout the duration of each closure project. In 2024, independent wastewater treatment contractors treated approximately 1.7 billion gallons of water and independent sampling contractors conducted 557 sampling events for the effluent and receiving streams. To date, over 6.14 billion gallons of water has been treated and over 3,325 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 most cases, water treatment continues into the 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.

Combustion Residual Leachate ("CRL")

In 2024, the EPA published the final rule revising the Steam-Electric ELGs. The new CRL requirements will require the addition of treatment systems for leachate collection systems at CCR landfills or closed ash ponds. For facilities with active coal plant operations beyond 2034, leachate cannot be discharged, meaning the requirement is for ZLD. For active landfills at Plant Bowen and Plant Scherer, the ZLD limit must be met by no later than December 31, 2029, or the date prescribed in the NPDES permit. For facilities without active coal plant operations, the leachate must meet certain limits before discharge, requiring a combination of physical and chemical treatment. For other landfills or closed ash ponds with leachate collection systems, the compliance deadline is also no later than December 31, 2029, or the date prescribed in the NPDES permit or the date upon which leachate collection systems are in place after 2029. The Company's 2025 ECS for CRL includes capital costs to meet ZLD limitations at Plants Bowen and Scherer, as well as ARO estimates for physical chemical treatment at retired facilities with leachate collection systems.

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 December 2024, 35 additional groundwater wells and piezometers were installed, more than 2,200 groundwater samples were collected from all the wells, and the results were included in 62 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, and aquifer testing), laboratory bench scale testing, pilot testing, remedy selection, public meetings, and reporting to EPD.

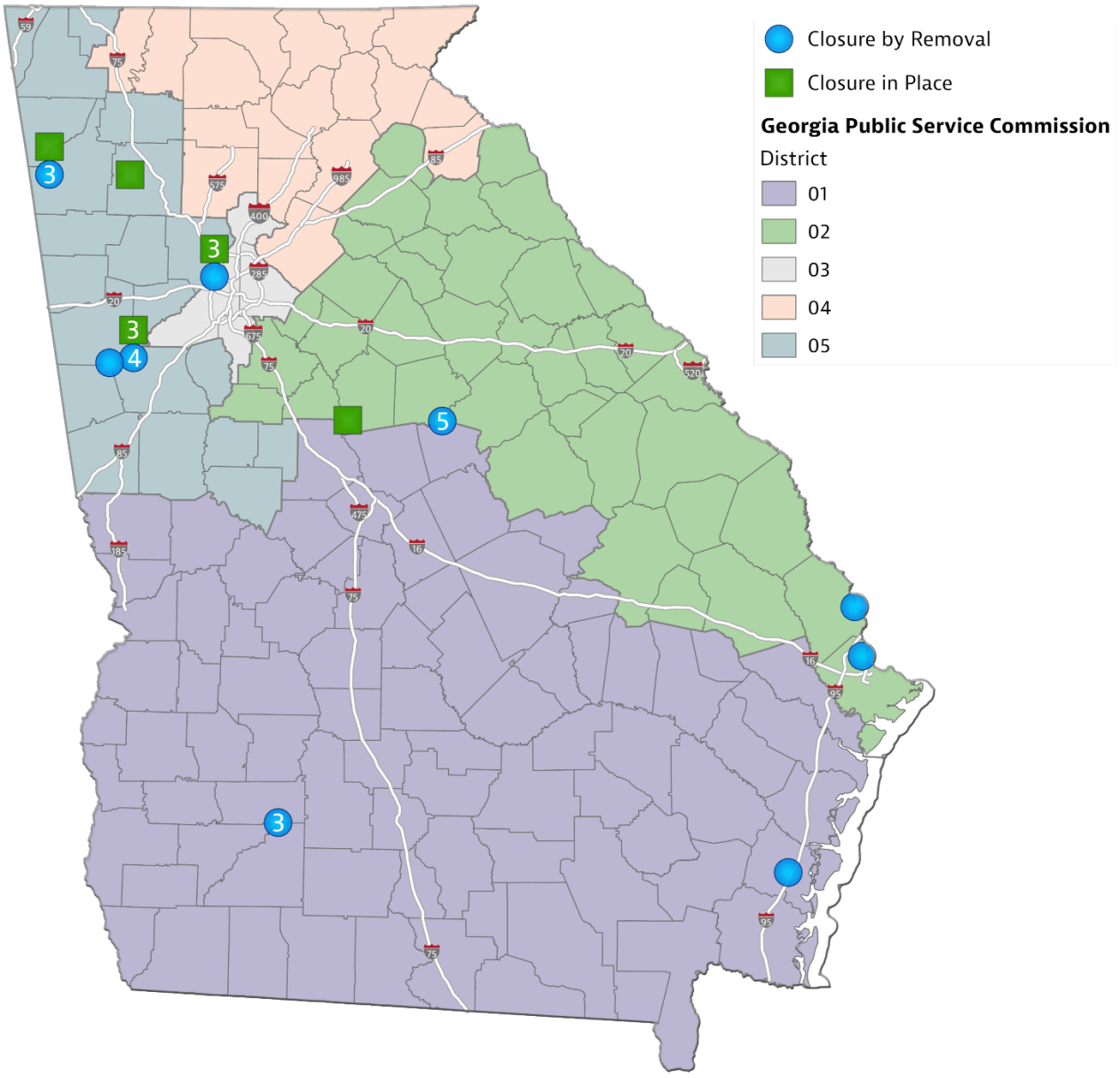
Draft remedy selection reports for two Arkwright units were submitted to EPD in the first quarter of 2024. The reports signify the next step in the regulatory process towards selecting a remedy to address substances in groundwater above the GWPS. The reports were prepared by independent engineers and 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, Bowen AP-1, and McDonough AP-2,3/4, that the Company submitted in 2022 and 2023, authorizing further testing in support of remedy selection. EPD-approved pilot testing of the potential remedy at Plant Hammond began in third quarter of 2023 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 and pilot testing of injections is currently underway.

Ash Pond Closure Progress

Georgia Power has 29 ash ponds at 11 sites.

Figure 1: Ash Pond Closure Locations



Construction Activities

The Company has continued making closure construction progress at its ash ponds across Georgia. Closure activities include dewatering, site preparation, ash excavation, ash consolidation/placement, installation of closure cover systems, installation of engineering controls, and site restoration. Pre-construction activities include engineering studies, design, closure evaluations, constructability reviews, and other early site preparation work (contractor mobilization, setup of temporary facilities, laydown area construction, stormwater controls installation, etc.). The Company must continue work on these closures to meet 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 4 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. Once a final permit is issued and closure certification reports are acknowledged by EPD, the Company will begin PCC. PCC includes activities that extend beyond closure or closure construction, including groundwater monitoring, water management, general site maintenance, and other compliance activities following IPCC. This category encompasses both post-closure for a CIP project and post-closure construction ("PCC – Post Removal") for a CBR project. Ash ponds are grouped in the table below in accordance with the permit application submitted for the closure.

Table 4: 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-2	CBR	PCC – Post Removal	Ongoing
Ash removal has been completed for AP-2 and dewatering activities will continue until backfilling or restoration is completed. A certification of removal was filed with EPD and acknowledged by EPD.			
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 has been installed (installation completed fourth quarter 2024) outside and downgradient of the CCR footprint of AP-3. The system utilizes specialized lined planting units constructed with optimum planting media designed to promote downward root growth and focus groundwater extraction from a targeted depth interval. EPD issued a final permit for Hammond AP-3 in November 2023.			
Kraft AP-1	CBR	Previously Removed	Previously Removed
CCR was previously removed from the 7-acre ash pond to off-site permitted landfills before the Georgia CCR Rule became effective. Additionally, the removal was part of an expanded plant retirement project and was regulated by 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. Although this ash pond was removed in 2015 and was formerly not regulated by the federal or state CCR rules, the 2024 CCR Legacy Rule now regulates Kraft AP-1. Georgia Power is working with the current property owner to meet additional compliance requirements.			
McIntosh AP-1	CBR	PCC – Post-Removal	Completed
CCR was removed from the 22-acre ash pond and placed in Landfill No. 4, an on-site 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.			

	Closure Strategy	Construction Status	Dewatering Status
Yates AP-1	CBR	PCC – Post Removal	Completed
CCR was removed from the 30-acre ash pond and consolidated into R6, an on-site 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.			
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 eastern half of the closed ash pond is currently functioning as a service water pond for 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. A certification of partial removal and closure construction has been filed with EPD.			
Hammond AP-1	CBR	In Closure	Ongoing
Closure construction is near-complete 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.			
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.			

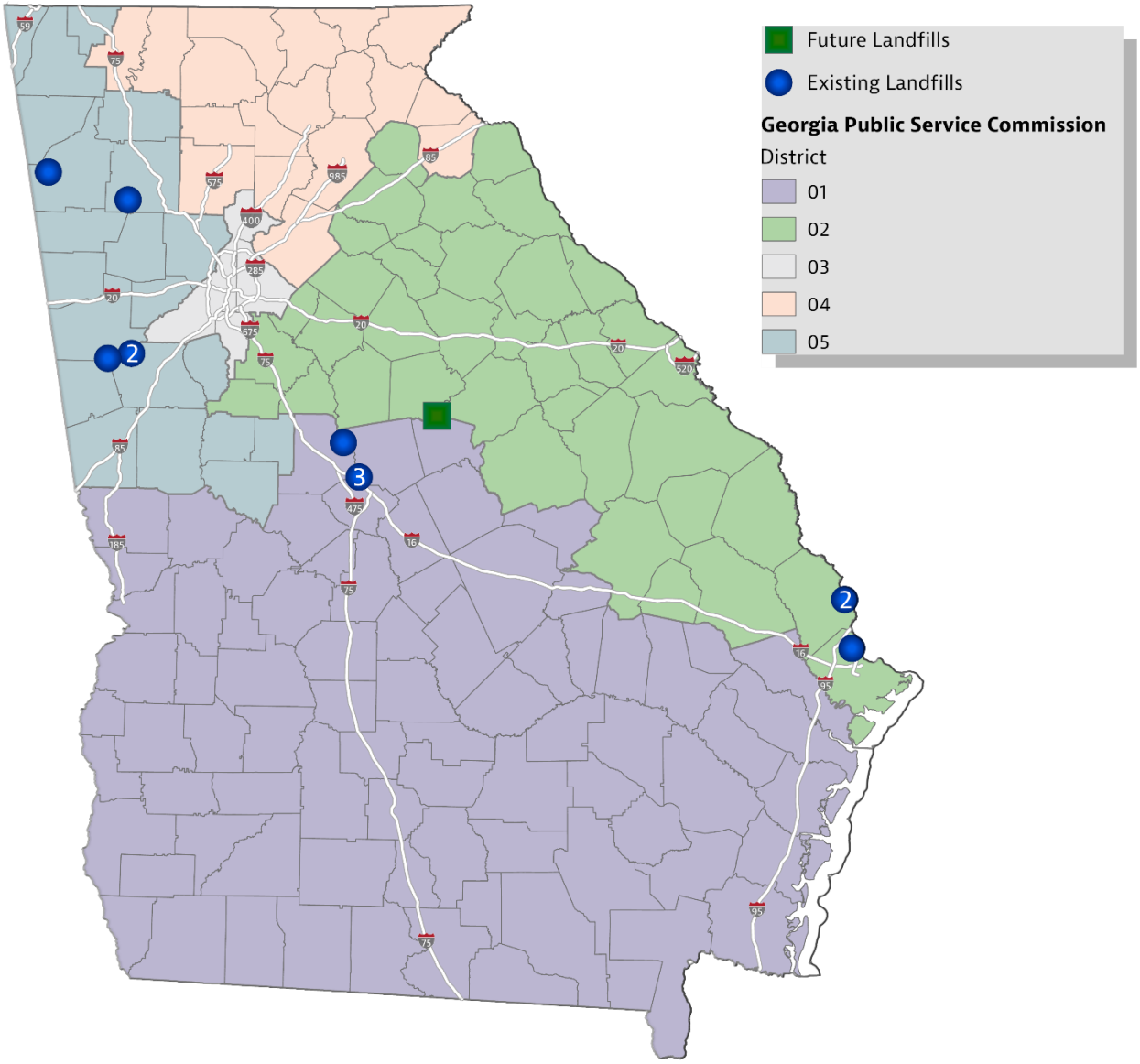
	Closure Strategy	Construction Status	Dewatering Status
McDonough AP-2, AP-3, AP-4	AP-2: CBR AP-3/4: CIP	In Closure	Ongoing
AP-2: CCR was removed from the 7-acre ash pond and consolidated into AP-1, AP-3, and AP-4. A certification of removal report has been submitted to and acknowledged by EPD. Site restoration 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. Excavation of AP-2 is expected to be complete in the first half of 2025. 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.			
Scherer AP-1	CIP	In Closure	Ongoing
Dewatering began in March 2024, in accordance with EPD-approved dewatering plan. The prime contractor mobilized to the site in the third quarter of 2024 and movement of CCR from the northern portion of the pond and eastern channel are underway to consolidate the footprint of 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.			
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. Certification of removal reports for AP-A and AP-B have 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 on-site permitted CCR landfill, R6.			

	Closure Strategy	Construction Status	Dewatering Status
Pre-Construction			
Branch AP-B, AP-C, AP-D	CBR	Pre-Construction	Ongoing
Design has been finalized and the construction of the on-site permitted landfill is ongoing, see Table 5 for more details. 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.			
Branch AP-E	CBR	Pre-Construction	Ongoing
Design has been finalized and the construction of the on-site 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 the Company-owned off-site permitted CCR landfill, Huffaker Road, pending permitting and construction for the expansion of Huffaker Road Landfill.			
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 on-site 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 on-site landfill to allow for the expansion, more details are in Table 5. Early site preparation activities are complete on the 343-acre ash pond.			

CCR Landfills

Georgia Power has 12 existing CCR landfills and one CCR landfill under construction.

Figure 2: 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, Kraft (Grumman Rd), 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 constructing one future on-site 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, five operational landfill permits, two closure permits, and one release from permit have been received to date.

Table 5: 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 ash from Plant Arkwright will be trucked to the permitted landfill at Plant Branch for potential beneficial use to be processed through the Plant Branch beneficial use facility. 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, however, 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 early 2025. Streambank mitigation credits were obtained in 2023 and 2024 for impacts to on-site streams resulting from the landfill's expansion; the Company expects to obtain additional streambank mitigation credits in 2025.	
Kraft Grumman Road Landfill	IPCC
The cap cover system has been installed and construction certification documents have been filed with EPD. The Company is working with EPD to finalize permitting documents, as such, additional engineering may be required at the site in 2025. 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 McIntosh 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 on-site 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 early 2025. Construction is underway to allow for the expansion of the on-site landfill and the Company is planning to replace the synthetic bottom 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 R6 Landfill	In Closure
Former ash pond AP-C was previously incorporated into the on-site permitted CCR landfill, R6. R6 is currently being closed. Site restoration and maintenance is ongoing.	
Former CCR Landfills	
Yates Gypsum Stack Landfill	Removed
The Gypsum Landfill has been removed. A certification of removal was filed with EPD and acknowledged by EPD. In November 2024, EPD accepted the Decontamination Certification for Yates Gypsum Landfill and issued a release from its CCR Permit that went into effect immediately. The Company properly abandoned the groundwater monitoring wells that were part of the Gypsum Landfill's groundwater monitoring network in first quarter of 2025.	

Future CCR Landfills	
Arkwright Landfill	On Hold
The permitting activities for a future on-site Arkwright CCR landfill have paused due to the decision to move CCR from Plant Arkwright to Plant Branch's landfill for potential future beneficial use. 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 to preserve scope flexibility should the landfill be needed in the future.	
	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).

Looking ahead to the 2025-2028 timeframe, the Company plans to invest in upgrades at the ABUC to further enhance its capabilities. Specific initiatives will involve general maintenance and repairs, installation of pilot-scale grinding equipment, and installing additional storage capacity for ash samples. Two pilot projects are also anticipated for this time frame: ferric-chloride production from CCR and carbon reduction using froth flotation. These upgrades and projects will position ABUC as a leading center for coal ash research and development, reinforcing the Company's commitment to innovative and sustainable CCR management practices.

Beneficial Use of Stored Ash at the Facility Level

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

Plant Mitchell

The Company is continuing with plans to remove the stored coal ash at Plant Mitchell's three ash ponds for beneficial use. Over the next several years, up to approximately two million tons of ash are planned to be removed from the site to help create Portland cement, which is used to make concrete. These beneficial use plans will reduce the amount of ash required to be removed to an off-site landfill and ultimately serve to produce a valuable product. Through December 2024, approximately 900,000 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 due in part to inconsistencies in ash quality from the former ash ponds. Some of the ash quality issues have been resolved by blending ash from different areas of the ash pond prior to transport. This has impacted the contractor's production efficiency and schedule. The Company has continued to work with the on-site 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 on-site 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. A portion of the ash that does not meet the end-users' specifications is being sent to an offsite landfill.

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's beneficial use facility for use in the ready-mix concrete market began in the first quarter 2024, with up to nine million tons of ash anticipated to be harvested, processed, and removed from the site to support the ash pond closure. Through December 2024, approximately 210,000 tons of ash has been harvested from the site.

In the first year of operations, the Bowen beneficial use facility has processed less ash than projected, however, these reduced sales have been offset by the higher-than-expected market price for each ton of ash sold. System enhancements to meet production projections at the Bowen beneficial use facility are currently being evaluated and implemented by the beneficial use contractor. The procurement of the conveyor system planned for transportation to the beneficial use facility and landfill has paused while facility improvements are implemented.

Additionally, increased energy demand has boosted ash production from Plant Bowen operations which has made more production ash available to the market This increased

production of operational ash is likely to continue over the near term. In order to prepare for an increase in total ash volume available to the market, the contractor has expanded the railyard at Plant Bowen, significantly increased the rail car fleet, as well as installed improvements at Bowen's rail terminals. These modifications are anticipated to enhance the ability to manage harvested ash and increase market distribution.

The Company will continue to work with the contractor to manage productivity and market capacity with both operational and harvested ash. The Company and beneficial use contractor are utilizing applicable 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 ash from Plant Arkwright will be trucked to the permitted landfill at Plant Branch for potential beneficial use to be processed through the Plant Branch beneficial use facility. 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 on-site 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 6: Ash Pond Estimated Closure Construction Timeframes

	Closure by Removal	Closure in Place	Total	Estimated Closure Construction Completion[B]
Bowen		1	**1**	**2036**
Branch	5		**5**	**2041**
Hammond	3	1	**4**	**2034**
Kraft	1		**1**	**2016** [A]
McDonough	1	3	**4**	**2026**
McIntosh	1		**1**	**2022** [A]
McManus	1		**1**	**2020** [A]
Mitchell	3		**3**	**2028**
Scherer		1	**1**	**2033**
Wansley	1		**1**	**2035**
Yates	4	3	**7**	**2028**
	20	9	**29**	

[A] *Denotes actual closure construction completion date.*

[B] *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.*

Landfill Estimated Closure Construction Timeframes

Table 7: Landfill Estimated Closure Construction Timeframes

	CCR Landfills	Future, New Permitted Landfills	Total	Estimated Closure Construction Completion[B]
Arkwright	3	1	**4**	**2032**
Bowen	1		**1**	**2040**
Branch		1	**1**	**2041**
Hammond	1		**1**	**2034**
Kraft (Grumman Rd)	1		**1**	**2024[A]**
McIntosh	2		**2**	**2023[C]**
Scherer	1		**1**	**2046**
Wansley	1		**1**	**2035**
Yates	2[D]		**2**	**2025**
	12	2	**14**	

[A] Denotes actual closure construction completion date.

[B] 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.

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

[D] Plant Yates Gypsum Landfill was released from its CCR permit on November 25, 2024.

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, scope amendments to comply with new environmental rules or legislation, post-closure activities, and estimated future escalation. Georgia Power's current cost estimate applicable to retail customers over the next approximately 60 years is $8.0 billion, which includes the approximately $1.7 billion in actual costs previously incurred and $1.1 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.

Current Cost Estimates

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

The fourth quarter 2024 updates included several notable factors, including but not limited to the following:

- The new CRL requirements from the 2024 ELG Supplemental Rule will require the addition of treatment systems for leachate collection systems at CCR landfills and closed ash ponds.

- An increase in future escalation rates as compared to the October semi-annual report for all projects in the portfolio. This is primarily due to an increase in projected commodity prices since the last semi-annual report. Updated cashflow timing also impacted the amount of escalation calculated.

Table 8, Table 9, and Table 10 below contain the latest projected estimates for Georgia Power's CCR ARO ash pond closure and landfill projects. See Appendix C for further details on site-specific financial summary tables.

Near-Term Cash Flows

Updated assumptions as of the fourth quarter of 2024 have resulted in a retail cash flow forecast for the program for years 2024–2028. 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.

- 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 8: Current Cost Estimates for CCR ARO Ash Pond Closure Projects

Ash Ponds

($ in Millions)

Facility	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032 and Beyond	Total
Bowen	**295.0**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Branch	**260.6**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Hammond	**152.1**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Kraft	**8.4**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McDonough	**161.5**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McIntosh	**22.8**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McManus	**110.1**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Mitchell	**169.5**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Scherer	**27.8**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Wansley	**57.2**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Yates	**285.4**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Ash Pond Subtotal	**1,550.5**	**270.7**	**288.1**	**245.8**	**222.3**	**1,107.3**	**2,296.5**	**5,981.1**
*Escalation included in Forecast above***	*N/A*	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	*587.9*

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003, through December 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 9: Current Cost Estimates for CCR ARO Landfill Projects

Landfills

($ in Millions)

Facility	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032 and Beyond	Total
Arkwright	**73.0**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Bowen	**0.00**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Branch	**(0.0)**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Hammond	**13.4**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Kraft	**21.5**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McIntosh	**13.2**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Scherer	**0.0**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Wansley	**(0.0)**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Yates	**39.8**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill Subtotal	**160.9**	**25.1**	**46.2**	**55.3**	**66.7**	**361.5**	**1,267.0**	**1,982.7**
*Escalation included in Forecast above***	*N/A*	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	*550.6*

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003, through December 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 10: Current Cost Estimates for CCR ARO Ash Pond Closure and Landfill Projects

($ in Millions)

Category	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032 and Beyond	Total
Ash Pond Subtotal	**1,550.5**	**270.7**	**288.1**	**245.8**	**222.3**	**1,107.3**	**2,296.5**	**5,981.1**
Landfill Subtotal	**160.9**	**25.1**	**46.2**	**55.3**	**66.7**	**361.5**	**1,267.0**	**1,982.7**
Total	**1,711.4**	**295.7**	**334.3**	**301.1**	**289.1**	**1,468.7**	**3,563.5**	**7,963.8**
*Escalation included in Forecast above***	*N/A*	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	*1,138.5*

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003, through December 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 11: 2024 Year-to-Date Actual versus Budget Comparison

($ in Millions)

	January - December 2024 Actuals	January – December 2024 Budget*	January – December 2024 Variance
Arkwright	$ 12.0	REDACTED	REDACTED
Bowen	$ 46.2	REDACTED	REDACTED
Branch	$ 68.5	REDACTED	REDACTED
Hammond	$ 27.3	REDACTED	REDACTED
Kraft	$ 2.9	REDACTED	REDACTED
McDonough	$ 17.2	REDACTED	REDACTED
McIntosh	$ 2.0	REDACTED	REDACTED
McManus	$ 1.4	REDACTED	REDACTED
Mitchell	$ 40.5	REDACTED	REDACTED
Scherer	$ 7.9	REDACTED	REDACTED
Wansley	$ 22.2	REDACTED	REDACTED
Yates	$ 16.7	REDACTED	REDACTED
Total	**$ 264.8**	**$ 304.2**	**$ (39.4)**

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 11 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:

- **Branch:** The primary driver of the 2024 overruns is the implementation of the beneficial use facility scope not previously captured in the October 2023 compliance filing.
- **Hammond**: Underrun for the site is due primarily to higher CCR moisture content and longer drying times that resulted in lower-than-expected production rates**.**
- **Mitchell:** Overrun is primarily due to an increase in CCR quantities being transported offsite for beneficial use and to the offsite landfill by the prime contractor.
- **Wansley:** Underrun is primarily due to the landfill liner design change that has delayed the start of construction on the landfill as well as delays associated with mobilization of the contractor for the stream relocation work in the landfill expansion footprint.

- **Yates:** The 2024 underruns are primarily due to a delay in design completion for restoration activities; along with a schedule extension that delayed the start of IPCC due to commissioning of the subsurface hydraulic conveyance system in the AP-3/AP-B' footprint.

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**
CCRMU	**Coal Combustion Residual Management Unit**
CIP	**Closure In Place**
CRL	**Combustion Residual Leachate**
EAC	**Estimate at Completion**
ECCR	**Environmental Compliance Cost Recovery**
ECS	**Environmental Compliance Strategy**
ELG	**Effluent Limitations Guidelines**
EPA	**Environmental Protection Agency**
EPD	**Environmental Protection Division**
GPC	**Georgia Power Company**
GWPS	**Groundwater Protection Standard**
IP	**Individual Permit**
IPCC	**Interim Post-Closure Care**
IRP	**Integrated Resource Plan**
LF	**Landfill**
PCC	**Post-Closure Care**
PSC	**Georgia Public Service Commission**
SI	**Surface Impoundment**
RFP	**Request for Proposals**
USACE	**United States Army Corps of Engineers**
ZLD	**Zero Liquid Discharge**

VIII. APPENDIX B

Schedule Summary - CCR Unit Level

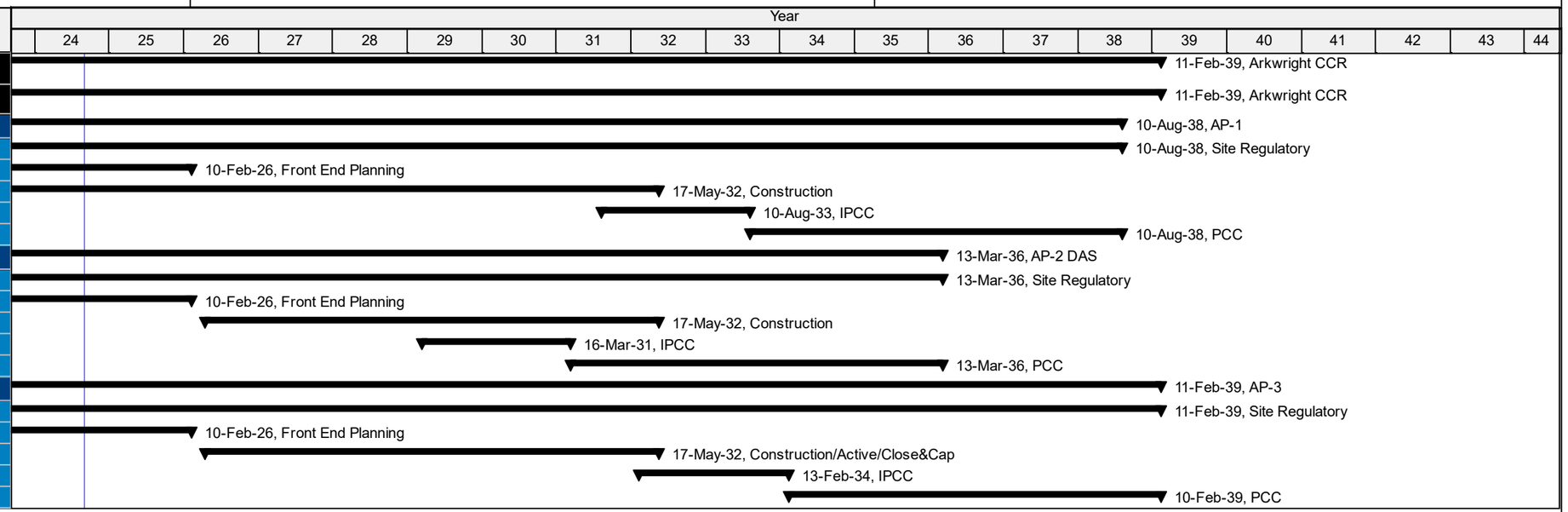
The following Gantt charts include schedule summaries for each site, with activities for each ash pond and CCR landfill grouped into the categories listed below:

- 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 on-site 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.

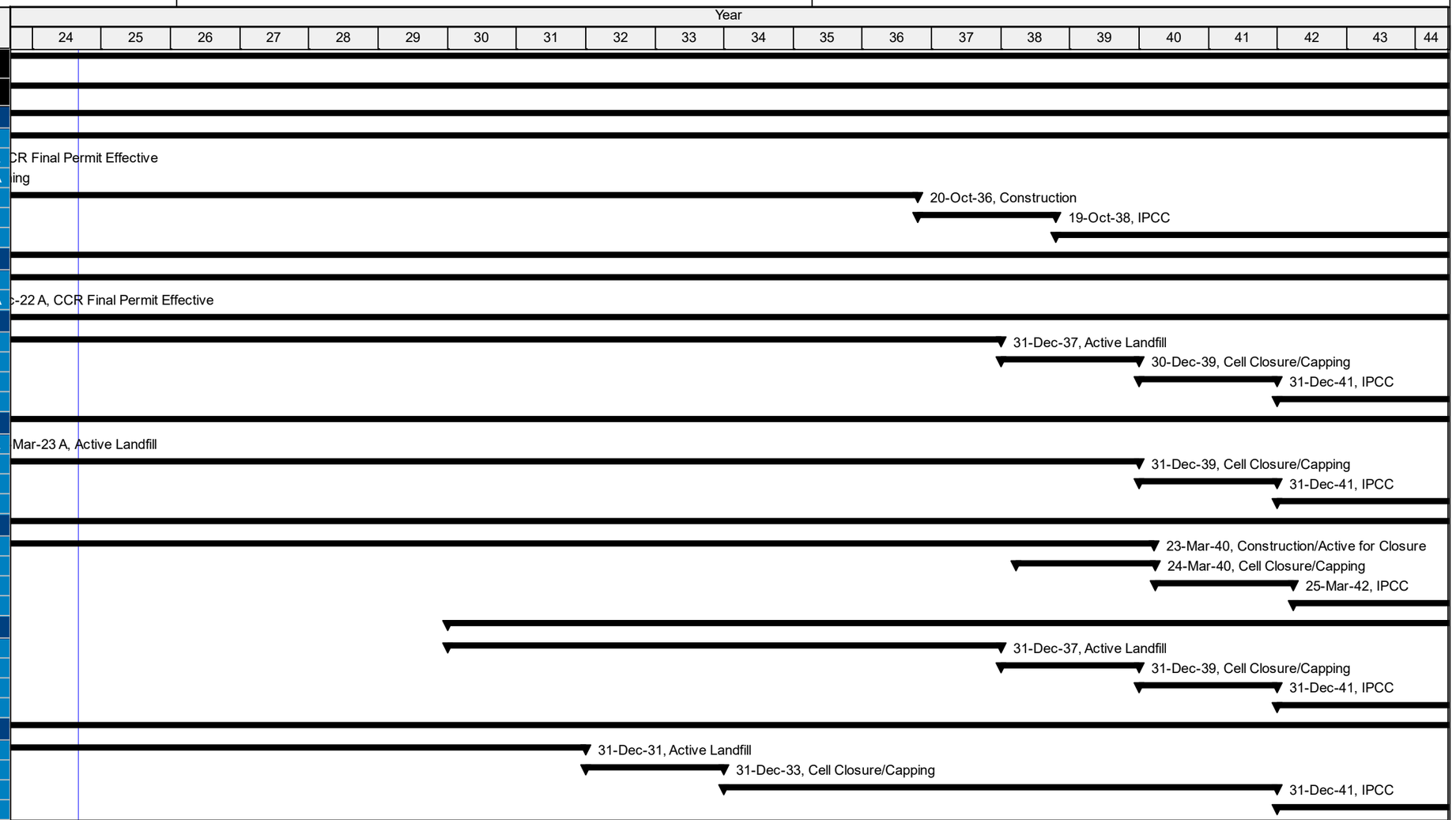
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Arkwright CCR	19-Oct-15 A	11-Feb-39
Arkwright CCR	19-Oct-15 A	11-Feb-39
AP-1	19-Oct-15 A	10-Aug-38
Site Regulatory	19-Oct-15 A	10-Aug-38
Front End Planning	01-Jan-16 A	10-Feb-26
Construction	01-Jun-23 A	17-May-32
IPCC	11-Aug-31	10-Aug-33
PCC	10-Aug-33	10-Aug-38
AP-2 DAS	19-Oct-15 A	13-Mar-36
Site Regulatory	19-Oct-15 A	13-Mar-36
Front End Planning	01-Jan-16 A	10-Feb-26
Construction	14-Apr-26	17-May-32
IPCC	13-Mar-29	16-Mar-31
PCC	16-Mar-31	13-Mar-36
AP-3	01-Jan-16 A	11-Feb-39
Site Regulatory	20-Nov-18 A	11-Feb-39
Front End Planning	01-Jan-16 A	10-Feb-26
Construction/Active/Close&Cap	14-Apr-26	17-May-32
IPCC	12-Feb-32	13-Feb-34
PCC	13-Feb-34	10-Feb-39



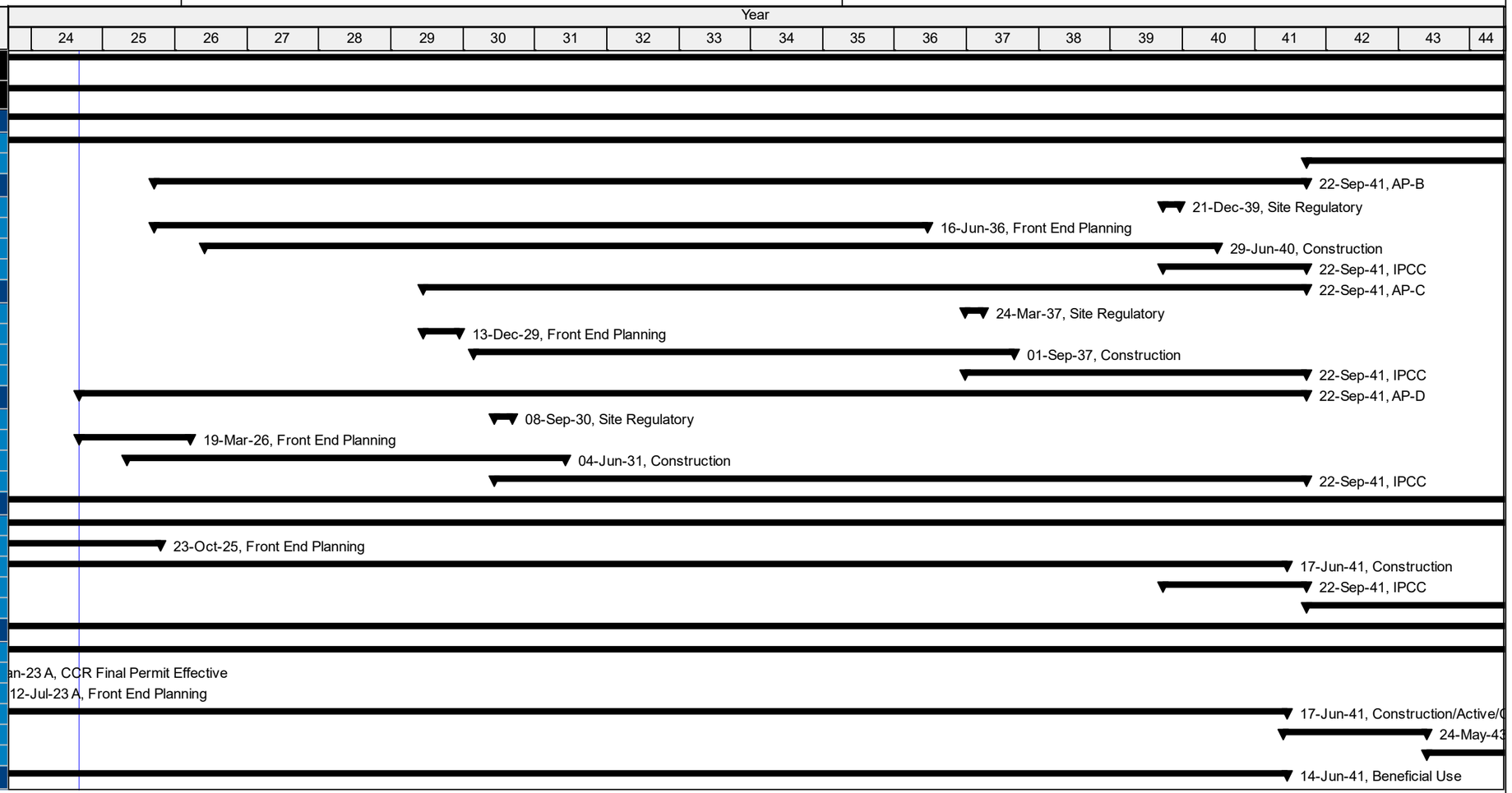
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Bowen CCR	12-May-08 A	24-Mar-72
Bowen CCR	12-May-08 A	24-Mar-72
AP-1	19-Oct-15 A	18-Oct-68
Site Regulatory	19-Oct-15 A	18-Oct-68
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	20-Oct-36
IPCC	21-Oct-36	19-Oct-38
PCC	19-Oct-38	18-Oct-68
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-37
Cell Closure/Capping	01-Jan-38	30-Dec-39
IPCC	31-Dec-39	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	24-Mar-72
Construction/Active for Closure	29-Apr-22 A	23-Mar-40
Cell Closure/Capping	25-Mar-38	24-Mar-40
IPCC	24-Mar-40	25-Mar-42
PCC	25-Mar-42	24-Mar-72
LF Cells 7 & 8	01-Jan-30	01-Jan-72
Active Landfill	01-Jan-30	31-Dec-37
Cell Closure/Capping	01-Jan-38	31-Dec-39
IPCC	01-Jan-40	31-Dec-41
PCC	01-Jan-42	01-Jan-72
LF Cells 9 & 10	01-Jan-23 A	01-Jan-72
Active Landfill	01-Jan-23 A	31-Dec-31
Cell Closure/Capping	01-Jan-32	31-Dec-33
IPCC	01-Jan-34	31-Dec-41
PCC	01-Jan-42	01-Jan-72



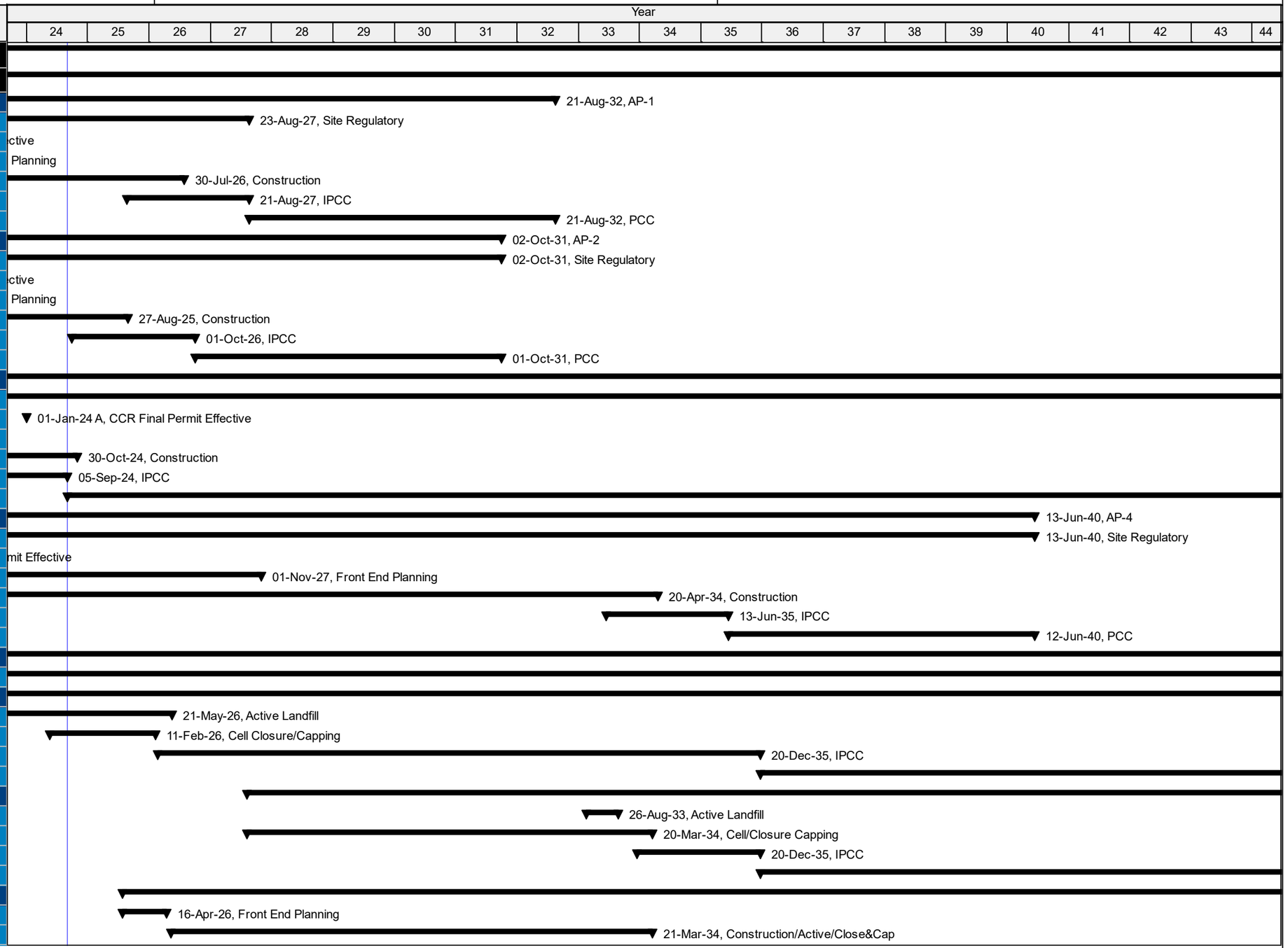
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Branch CCR	19-Oct-15 A	25-May-73
Branch CCR	19-Oct-15 A	25-May-73
AP-B/AP-C/AP-D	19-Oct-15 A	24-Sep-46
Site Regulatory	19-Oct-15 A	24-Sep-46
PCC	23-Sep-41	22-Sep-46
AP-B	17-Sep-25	22-Sep-41
Site Regulatory	22-Sep-39	21-Dec-39
Front End Planning	17-Sep-25	16-Jun-36
Construction	29-May-26	29-Jun-40
IPCC	23-Sep-39	22-Sep-41
AP-C	15-Jun-29	22-Sep-41
Site Regulatory	24-Dec-36	24-Mar-37
Front End Planning	15-Jun-29	13-Dec-29
Construction	28-Feb-30	01-Sep-37
IPCC	25-Dec-36	22-Sep-41
AP-D	05-Sep-24	22-Sep-41
Site Regulatory	10-Jun-30	08-Sep-30
Front End Planning	05-Sep-24	19-Mar-26
Construction	01-May-25	04-Jun-31
IPCC	11-Jun-30	22-Sep-41
AP-E	19-Oct-15 A	23-Sep-46
Site Regulatory	19-Oct-15 A	23-Sep-46
Front End Planning	01-Jan-16 A	23-Oct-25
Construction	01-Mar-19 A	17-Jun-41
IPCC	23-Sep-39	22-Sep-41
PCC	23-Sep-41	23-Sep-46
Branch LF	01-Jan-16 A	25-May-73
Site Regulatory	28-Feb-17 A	25-May-73
CCR Final Permit Effective	25-Jan-23 A	25-Jan-23 A
Front End Planning	01-Jan-16 A	12-Jul-23 A
Construction/Active/Close&Cap	10-Apr-23 A	17-Jun-41
IPCC	25-May-41	24-May-43
PCC	25-May-43	24-May-73
Beneficial Use	12-Jun-23 A	14-Jun-41



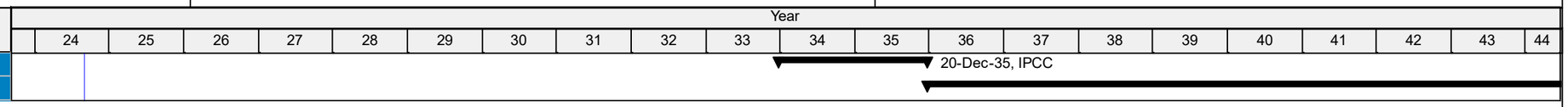
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Hammond CCR	01-Jan-08 A	21-Dec-65
Hammond CCR	01-Jan-08 A	21-Dec-65
AP-1	19-Oct-15 A	21-Aug-32
Site Regulatory	19-Oct-15 A	23-Aug-27
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	30-Jul-26
IPCC	22-Aug-25	21-Aug-27
PCC	23-Aug-27	21-Aug-32
AP-2	19-Oct-15 A	02-Oct-31
Site Regulatory	19-Oct-15 A	02-Oct-31
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	27-Aug-25
IPCC	01-Oct-24	01-Oct-26
PCC	01-Oct-26	01-Oct-31
AP-3	19-Oct-15 A	05-Sep-54
Site Regulatory	19-Oct-15 A	04-Sep-54
CCR Final Permit Effective	01-Jan-24 A	01-Jan-24 A
Front End Planning	01-Jan-16 A	25-May-16 A
Construction	26-May-16 A	30-Oct-24
IPCC	13-Nov-18 A	05-Sep-24
PCC	05-Sep-24	05-Sep-54
AP-4	19-Oct-15 A	13-Jun-40
Site Regulatory	19-Oct-15 A	13-Jun-40
CCR Final Permit Effective	27-Jan-21 A	27-Jan-21 A
Front End Planning	01-Jan-16 A	01-Nov-27
Construction	11-Jan-21 A	20-Apr-34
IPCC	14-Jun-33	13-Jun-35
PCC	14-Jun-35	12-Jun-40
Huffaker Rd LF	01-Jan-08 A	21-Dec-65
Site Regulatory	01-Jan-08 A	21-Dec-65
Huffaker Rd A/B	01-Jan-08 A	20-Dec-65
Active Landfill	01-Jan-08 A	21-May-26
Cell Closure/Capping	22-May-24 A	11-Feb-26
IPCC	20-Feb-26	20-Dec-35
PCC	21-Dec-35	20-Dec-65
Huffaker Rd Cell E	05-Aug-27	20-Dec-65
Active Landfill	21-Feb-33	26-Aug-33
Cell/Closure Capping	05-Aug-27	20-Mar-34
IPCC	20-Dec-33	20-Dec-35
PCC	21-Dec-35	20-Dec-65
Huffaker Rd Cell F	29-Jul-25	20-Dec-65
Front End Planning	29-Jul-25	16-Apr-26
Construction/Active/Close&Cap	13-May-26	21-Mar-34



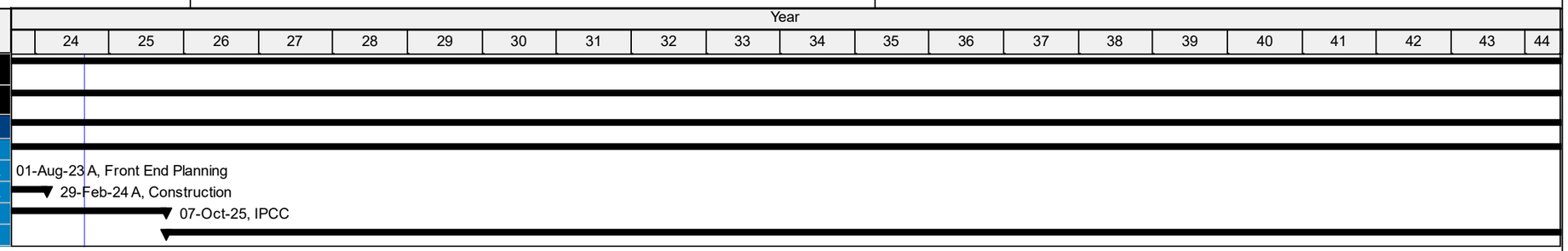
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
IPCC	21-Dec-33	20-Dec-35
PCC	21-Dec-35	20-Dec-65



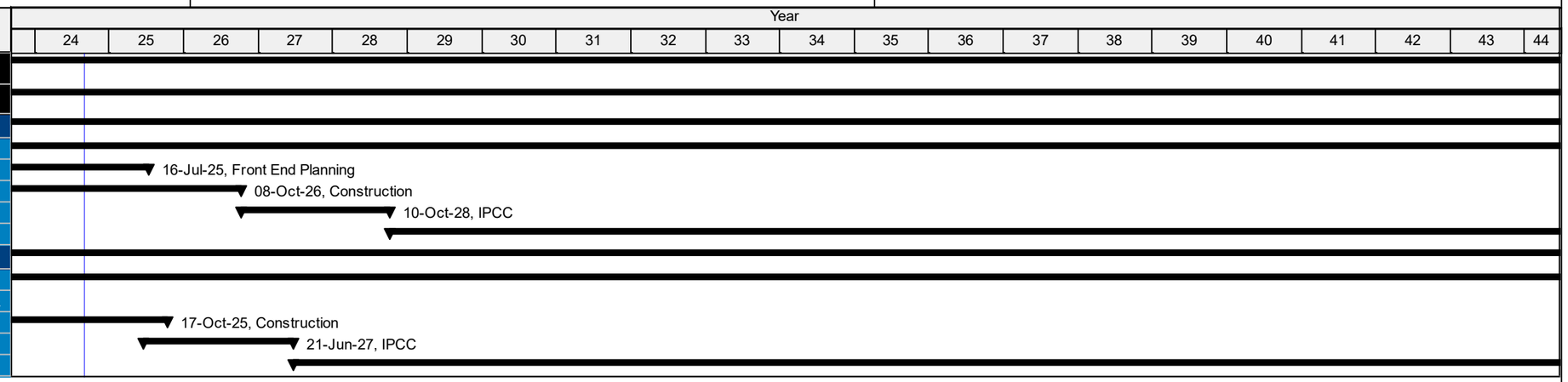
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Kraft CCR	19-Oct-15 A	11-Oct-55
Kraft CCR	19-Oct-15 A	11-Oct-55
Grumman Rd.	19-Oct-15 A	11-Oct-55
Site Regulatory	19-Oct-15 A	11-Oct-55
Front End Planning	05-Nov-15 A	01-Aug-23 A
Construction	27-Feb-17 A	29-Feb-24 A
IPCC	03-Jan-20 A	07-Oct-25
PCC	08-Oct-25	09-Oct-55



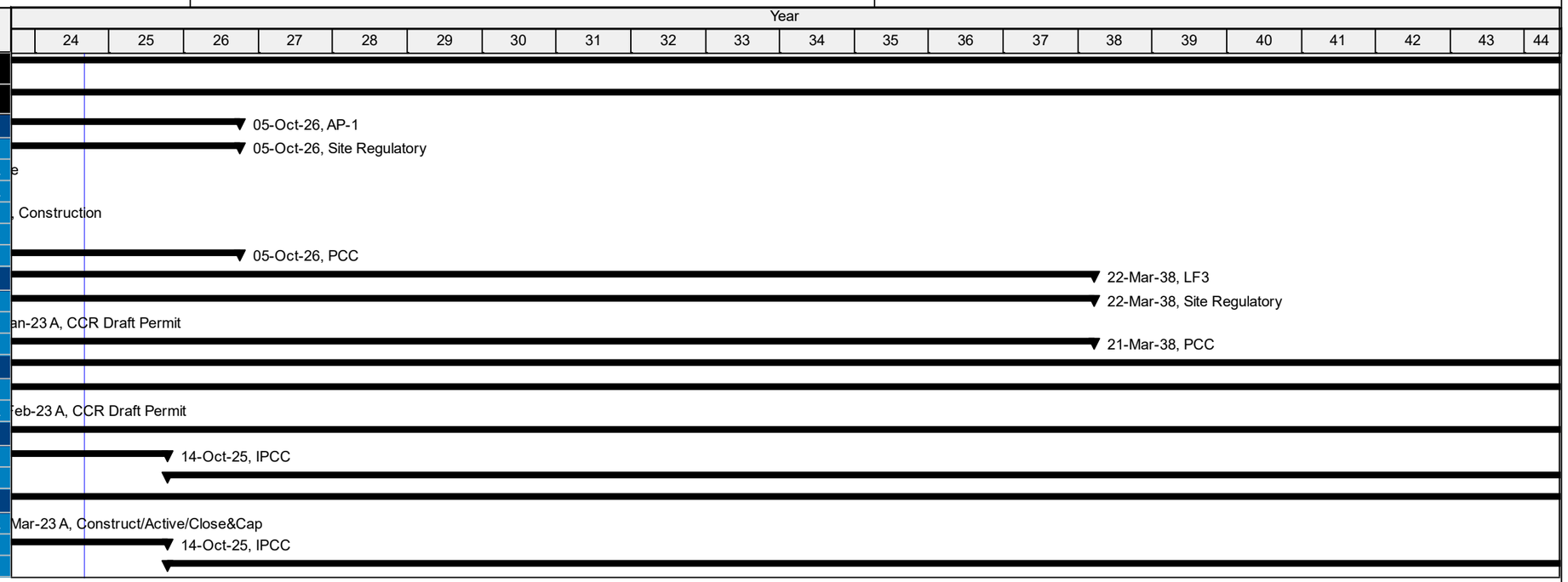
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
McDonough CCR	19-Oct-15 A	08-Oct-58
McDonough CCR	19-Oct-15 A	08-Oct-58
AP-1	19-Oct-15 A	08-Oct-58
Site Regulatory	19-Oct-15 A	08-Oct-58
Front End Planning	01-Jan-16 A	16-Jul-25
Construction	18-Jan-16 A	08-Oct-26
IPCC	09-Oct-26	10-Oct-28
PCC	10-Oct-28	08-Oct-58
AP-2/AP-3/AP-4	19-Oct-15 A	18-Jun-57
Site Regulatory	19-Oct-15 A	18-Jun-57
Front End Planning	01-Jan-16 A	12-Feb-16 A
Construction	19-Jan-16 A	17-Oct-25
IPCC	19-Jun-25	21-Jun-27
PCC AP-2/3/4	21-Jun-27	18-Jun-57



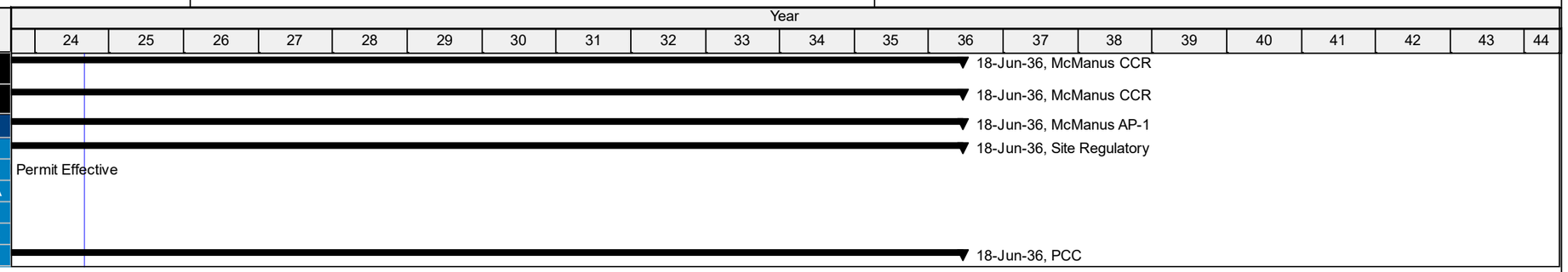
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
McIntosh CCR	21-Mar-08 A	14-Oct-55
McIntosh CCR	21-Mar-08 A	14-Oct-55
AP-1	19-Oct-15 A	05-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	05-Oct-26
LF3	21-Mar-08 A	22-Mar-38
Site Regulatory	21-Mar-08 A	22-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	14-Oct-55
Site Regulatory	19-Oct-15 A	14-Oct-55
CCR Draft Permit	24-Feb-23 A	24-Feb-23 A
LF4 Cell 1	27-Nov-18 A	14-Oct-55
IPCC	27-Nov-18 A	14-Oct-25
PCC	14-Oct-25	14-Oct-55
LF4 Cell 2A	23-Feb-21 A	14-Oct-55
Construct/Active/Close&Cap	23-Feb-21 A	15-Mar-23 A
IPCC	20-Oct-22 A	14-Oct-25
PCC	14-Oct-25	14-Oct-55



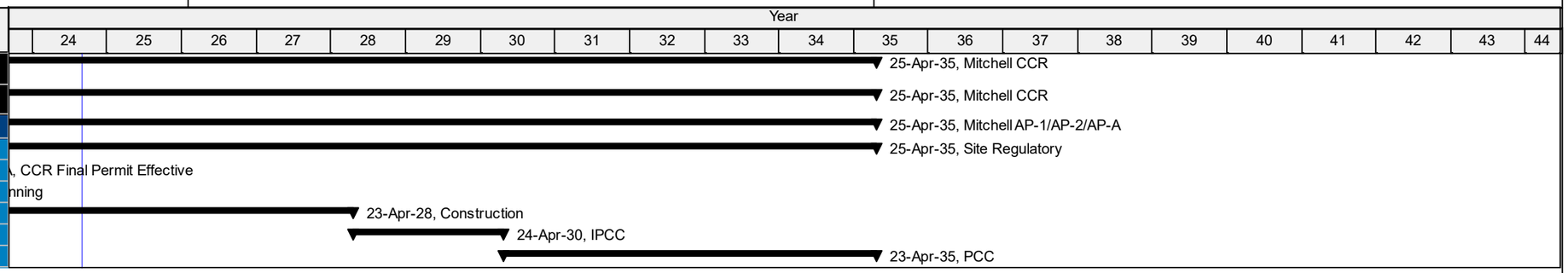
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



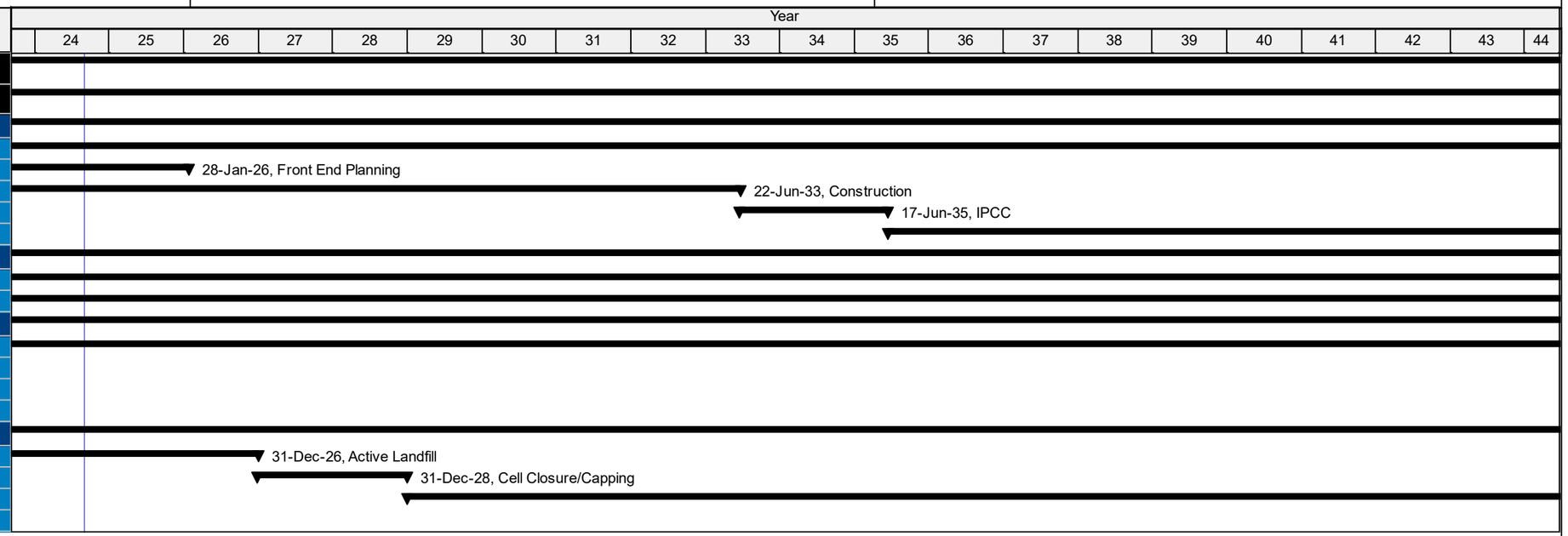
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Mitchell CCR	19-Oct-15 A	25-Apr-35
Mitchell CCR	19-Oct-15 A	25-Apr-35
Mitchell AP-1/AP-2/AP-A	19-Oct-15 A	25-Apr-35
Site Regulatory	19-Oct-15 A	25-Apr-35
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	23-Apr-28
IPCC	23-Apr-28	24-Apr-30
PCC	25-Apr-30	23-Apr-35



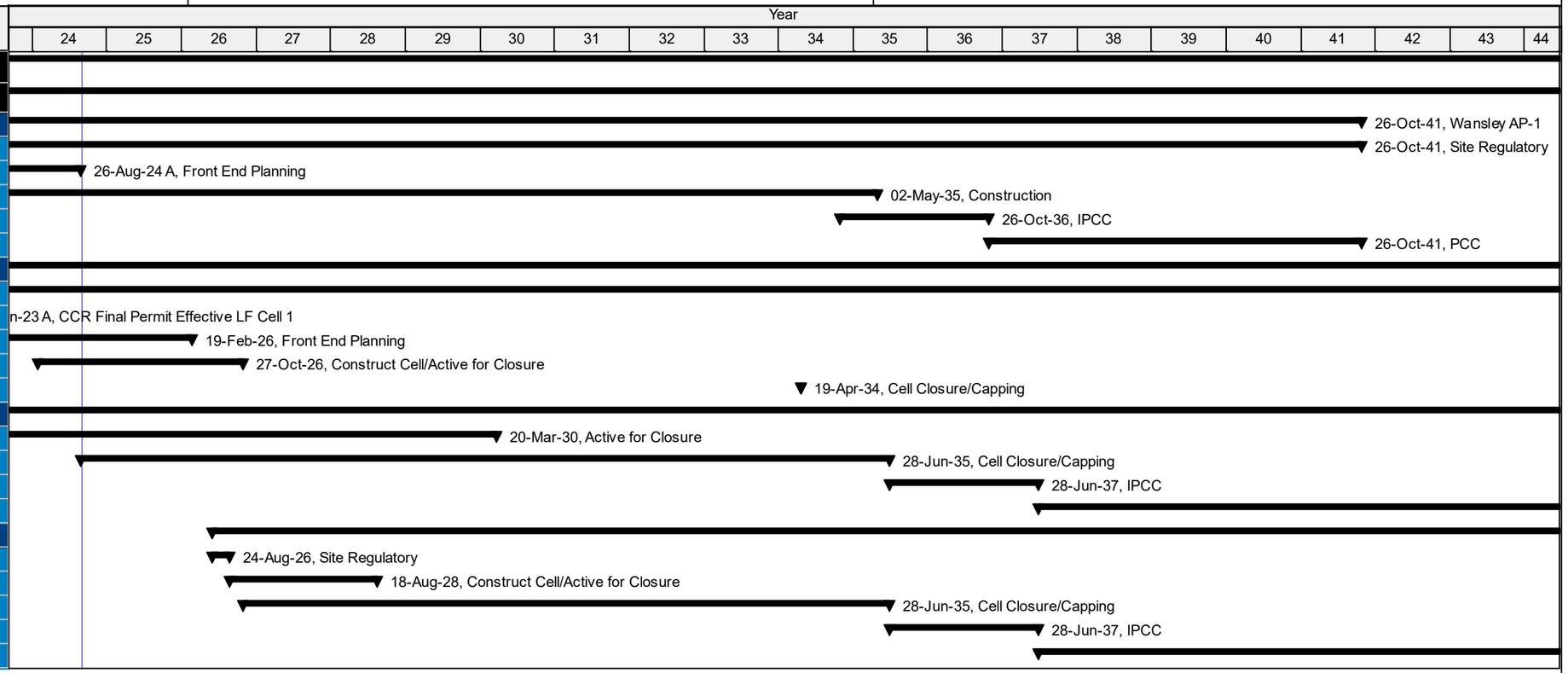
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Scherer CCR	01-Jan-10 A	01-Jan-79
Scherer CCR	01-Jan-10 A	01-Jan-79
Scherer AP-1	19-Oct-15 A	17-Jun-65
Site Regulatory	19-Oct-15 A	17-Jun-65
Front End Planning	01-Jan-16 A	28-Jan-26
Construction	06-Jul-21 A	22-Jun-33
IPCC	18-Jun-33	17-Jun-35
PCC	18-Jun-35	17-Jun-65
Scherer LF	01-Jan-10 A	01-Jan-79
Site Regulatory	01-Jan-10 A	01-Jan-79
PCC	02-Jan-20 A	10-Mar-50
LF Cell 1	02-Jan-20 A	31-Dec-78
Active Landfill	02-Jan-20 A	31-Dec-44
Cell Closure/Capping	31-Dec-44	31-Dec-46
IPCC	31-Dec-46	30-Dec-48
PCC	30-Dec-48	31-Dec-78
PAC/ASH CELL	02-Jan-20 A	01-Jan-79
Active Landfill	02-Jan-20 A	31-Dec-26
Cell Closure/Capping	31-Dec-26	31-Dec-28
IPCC - PAC/Ash Cell	31-Dec-28	31-Dec-48
PCC (+30 Years) - PAC/Ash Cell	31-Dec-48	01-Jan-79



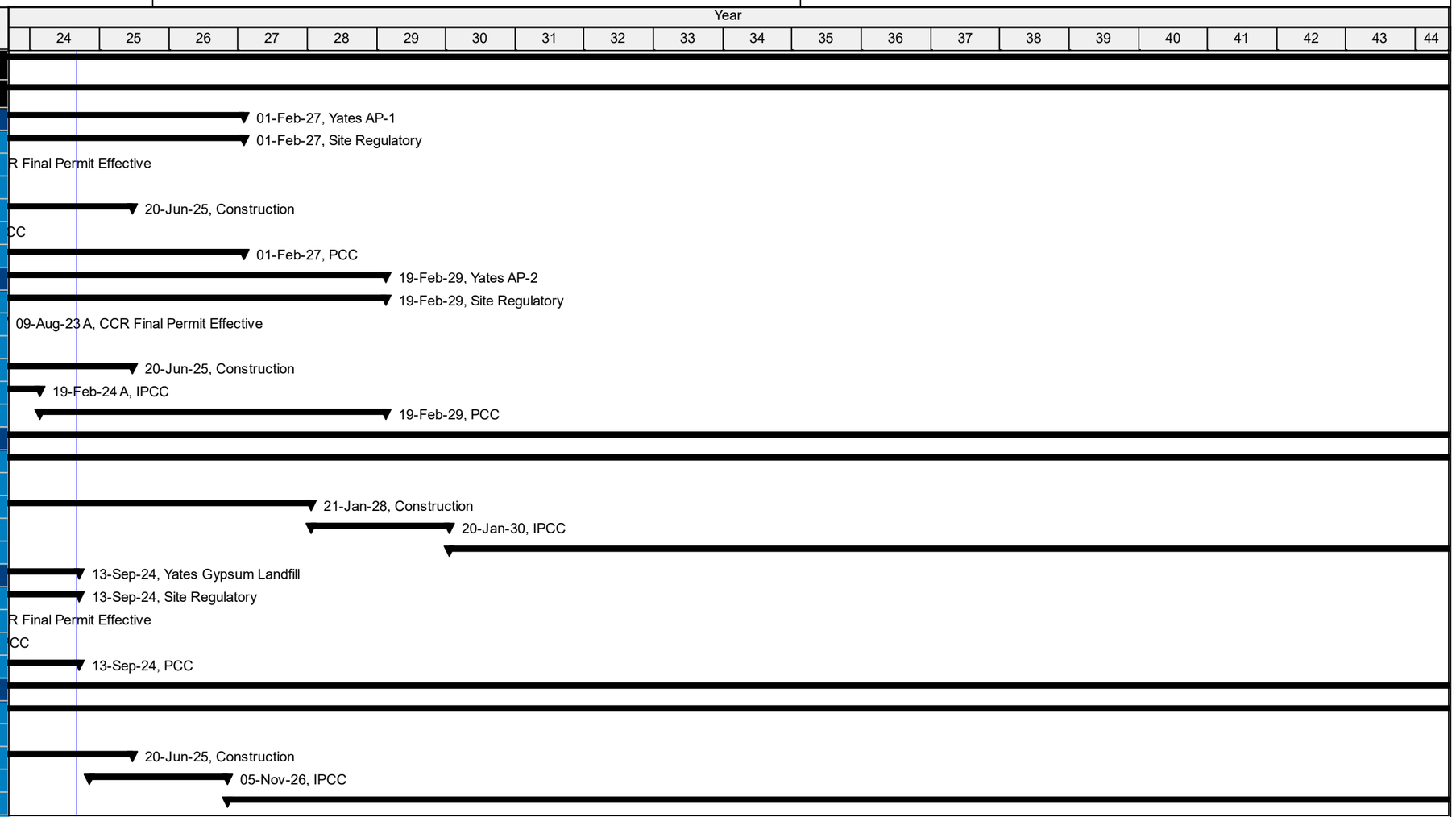
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Wansley CCR	01-Jan-12 A	28-Jun-67
Wansley CCR	01-Jan-12 A	28-Jun-67
Wansley AP-1	19-Oct-15 A	26-Oct-41
Site Regulatory	19-Oct-15 A	26-Oct-41
Front End Planning	01-Jan-16 A	26-Aug-24 A
Construction	19-Apr-21 A	02-May-35
IPCC	26-Oct-34	26-Oct-36
PCC	26-Oct-36	26-Oct-41
Wansley Landfill	01-Jan-12 A	28-Jun-67
Site Regulatory	01-Jan-12 A	28-Jun-67
CCR Final Permit Effective LF Cell 1	07-Jan-23 A	07-Jan-23 A
Front End Planning	22-Jul-22 A	19-Feb-26
Construct Cell/Active for Closure	29-Jan-24 A	27-Oct-26
Cell Closure/Capping	19-Apr-34	19-Apr-34
Landfill Cells 1/2/3	01-Jan-12 A	28-Jun-67
Active for Closure	01-Jan-12 A	20-Mar-30
Cell Closure/Capping	26-Aug-24 A	28-Jun-35
IPCC	28-Jun-35	28-Jun-37
PCC	28-Jun-37	28-Jun-67
Landfill Cell 4	04-Jun-26	28-Jun-67
Site Regulatory	04-Jun-26	24-Aug-26
Construct Cell/Active for Closure	24-Aug-26	18-Aug-28
Cell Closure/Capping	28-Oct-26	28-Jun-35
IPCC	28-Jun-35	28-Jun-37
PCC	28-Jun-37	28-Jun-67



Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

Activity ID	Start	Finish
Yates CCR	04-May-15 A	21-Jan-60
Yates CCR	04-May-15 A	21-Jan-60
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	20-Jun-25
IPCC	27-Nov-19 A	31-Jan-22 A
PCC	31-Jan-22 A	01-Feb-27
Yates AP-2	19-Oct-15 A	19-Feb-29
Site Regulatory	19-Oct-15 A	19-Feb-29
CCR Final Permit Effective	09-Aug-23 A	09-Aug-23 A
Front End Planning	01-Jan-16 A	20-Nov-19 A
Construction	05-Sep-19 A	20-Jun-25
IPCC	24-Apr-23 A	19-Feb-24 A
PCC	20-Feb-24 A	19-Feb-29
Yates AMA (AP-3/AP-B/AP-B'/AP-A)	19-Oct-15 A	21-Jan-60
Site Regulatory	19-Oct-15 A	21-Jan-60
Front End Planning	01-Jan-16 A	30-Apr-18 A
Construction	19-Aug-16 A	21-Jan-28
IPCC	21-Jan-28	20-Jan-30
PCC	20-Jan-30	21-Jan-60
Yates Gypsum Landfill	22-Jul-15 A	13-Sep-24
Site Regulatory	22-Jul-15 A	13-Sep-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	13-Sep-24
Yates R-6/AP-C	29-May-15 A	05-Nov-56
Site Regulatory	29-May-15 A	05-Nov-56
Front End Planning	29-May-15 A	21-Jul-16 A
Construction	29-May-15 A	20-Jun-25
IPCC	05-Nov-24	05-Nov-26
PCC	05-Nov-26	05-Nov-56



IX. APPENDIX C

Financial Summary - CCR Unit Level

The cost summaries include project-to-date actuals through December 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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Arkwright AP-1,2,3,Landfill	Closure by removal and consolidation to permitted landfill	$ 73.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 73.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 73.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $12 million consist primarily of detailed design work, front-end planning, permitting activities, landfill maintenance, early site work, mobilization of water management activities and maintenance activities at AP-1.

Bowen

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Advanced closure in place with liner	$ 295.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Bowen CCR Landfill	Active landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 295.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 295.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $46.2 million consist primarily of AP-1 ash excavation and beneficial use, and landfill cells 5/6 construction.

Branch

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-A	Closure by removal to permitted landfill	$ 1.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B	Closure by removal to permitted landfill	$ 27.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-C	Closure by removal to permitted landfill	$ 33.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-D	Closure by removal to permitted landfill	$ 21.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-E	Closure by removal to permitted landfill	$ 176.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 260.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 260.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $68.5 million consist primarily of on-going water management/dewatering, AP-B equalization pond, landfill construction, and beneficial use facility design, procurement, and construction.

Hammond

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 39.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill	$ 49.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 28.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Closure by removal to permitted landfill	$ 34.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Huffaker Road CCB Facility	Closure in place	$ 13.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 165.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 165.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $27.3 million consist primarily of continued AP-1 ash excavation activities, finalization of AP-2 ash movement, and start of AP-2 restoration activities along with front end planning activities for 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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 8.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Grumman Road Landfill	Closure in place	$ 21.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 29.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 29.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $2.9 million consist primarily of site maintenance, continued 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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Advanced closure in place	$ 35.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 18.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 50.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Advanced closure in place	$ 57.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 161.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 161.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $17.2 million consist primarily of water treatment, sitework maintenance, construction & certification support, AP-3 roadwork excavation, construction quality assurance, 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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 22.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 3	Closure in place	$ 3.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 4	Closure in place	$ 10.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 36.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

Note: Details may not add to totals due to rounding

Table 24. McIntosh Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 36.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $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 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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 110.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 110.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 110.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $1.4 million consist primarily of groundwater monitoring, pond dike maintenance, and associated oversight. Activities expected during the balance of 2024 include continued groundwater monitoring 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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-A	Closure by removal to permitted landfill and beneficial reuse	$ 2.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-1	Closure by removal to permitted landfill and beneficial reuse	$ 75.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill and beneficial reuse	$ 91.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 169.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Table 28. Mitchell Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 169.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $40.5 million consist primarily of AP-2 CCR excavation, stacking, truck, and rail car loading. Additionally, actuals include the start of excavation of AP-1 and activities associated with the transport and beneficial use of CCR. The cost of these activities is partially offset by beneficial use sales proceeds.

Scherer

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Advanced closure in place	$ 27.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Active landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 27.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 27.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

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

Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $7.9 million consist primarily of water treatment, prime contractors Pre-Stage 0, and the start of Stage 0-2 scope

Wansley

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal	$ 57.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 57.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
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 December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 57.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $22.2 million consist primarily of clearing and grubbing, importing sand, water treatment, instrumentation implementation, gypsum beneficial use, stream culvert, landfill cell sand and rock removal, and program and project management/project support.

Yates

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal	$ 17.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 122.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 95.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-A	Closure by removal	$ 17.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B	Closure by removal	$ 17.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B'	Advanced closure in place	$ 14.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Gypsum Landfill	Inactive landfill / closure by removal to permitted landfill and beneficial reuse	$ 4.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
R6 Landfill	Inactive landfill / closure in place	$ 35.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
		$ 325.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Table 34. Yates Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through December 2024*	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	**$ 325.2**	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates
**Project-to-Date Actuals represent costs incurred from January 1, 2003 through December 31, 2024*
Note: Details may not add to totals due to rounding

Notes

2024 actuals through December of $16.7 million consist primarily of completing the cap and cover, relocation of the auxiliary spillways and extend shared stormwater infrastructure ditch, AMA water management, and the security fence at C-pond.