Standards of Conduct
for Georgia Power Company's
Winter 2027_2028 BESS Request for Proposals

1. **Definitions.** These Standards of Conduct ("**Standards**") use the following defined terms:
   - **2023 IRP Update**: GPC's 2023 Integrated Resource Plan Update approved by the Commission in April 2024, which adopted an integrated resource plan identifying supply-side resources to be added by GPC over specified periods in time.
   - **Acknowledgement**: The forms of Standards Acknowledgement to be executed by the Evaluation Team and COP Team that are attached to these Standards as **Exhibits A-1** and **A-2** and are incorporated by this reference. Each Evaluation Team member must execute the Acknowledgement at **Exhibit A-1**, and each COP Team member must execute the Acknowledgement at **Exhibit A-2**. All Acknowledgements must be provided to the IE.
   - **Awarded Contract**: A Build-Transfer Agreement or Power Purchase Agreement, as applicable, to be entered between GPC and winning Bidder(s) (or other entity identified as Awarded Contract counterparty as permitted under the Winter 2027_2028 BESS RFP).
   - **Awarded Contract Execution Date**: The date on which an Awarded Contract is executed in accordance with the RFP Process.
   - **BESS:** An on-site battery energy storage system that is interconnected to the GPC electric system at the point of interconnection.
   - **Bid:** A written offer submitted in response to the Winter 2027_2028 BESS RFP to supply a BESS resource in accordance with an Awarded Contract.
   - **Bid Team**: If applicable, collective reference to employees or representatives of any GPC affiliate that intends to submit, or that submitted, a Bid in response to the Winter 2027_2028 BESS RFP.
   - **Bidder**: Any entity or individual submitting or potentially submitting a Bid in response to the Winter 2027_2028 BESS RFP.
   - **BTA**: Build Transfer Agreement to be entered into by GPC and a Winning Bidder (or other Person identified as BTA counterparty as allowed by this 2024 RFP) regarding a Build Transfer Facility.
   - **Commission**: The Georgia Public Service Commission.
   - **Company-Owned Proposal (COP)**: A GPC proposal to provide some or all of the resources sought by the Winter 2027_2028 BESS RFP.
   - **COP Team**: Employees or representatives of GPC or SCS who are involved in the development and submission of a COP in the Winter 2027_2028 BESS RFP.
   - **Evaluation Team**: Employees or representatives of GPC or SCS who are involved in preparing the Winter 2027_2028 BESS RFP, evaluating submissions in response to the Winter 2027_2028 BESS RFP, or otherwise acting for or on behalf of GPC regarding any aspect of the preparation or conduct of the RFP Process, including those listed as serving on the primary evaluation team and Specialized Technical Support Personnel.

- **GPC**: Georgia Power Company, the utility issuing the Winter 2027_2028 BESS RFP.
- **Independent Evaluator** or **IE**: Accion Group, LLC, who reports to the Commission and is under contract with GPC to oversee the RFP Process and who serves as the point of contact for all Bidders and COP Team members for RFP Process purposes, or any successor entity filling the IE role selected in accordance with the RFP Rule.
- **RFP Conclusion**: Execution of all final Awarded Contracts under the Winter 2027_2028 BESS RFP or termination of the Winter 2027_2028 BESS RFP, whichever occurs first.
- **RFP Process**: Preparation and issuance of the Winter 2027_2028 BESS RFP and all associated activities, which are expected to terminate upon the execution of one or more Awarded Contracts, as applicable, between GPC and the winning Bidder(s), and in which the IE will participate as contemplated by the RFP Rule.
- **RFP Rule**: Commission Rule 515-3-4-.04(3), as may be amended from time to time.
- **RFP Service Date**: The date the Evaluation Team list is initially filed with the Commission.
- **SCS**: Southern Company Services, Inc., an affiliate of GPC that performs services as agent for GPC.
- **Specialized Technical Support Personnel**: Employees or representatives of GPC or SCS who have specialized knowledge or job responsibilities used: (i) to develop a specific aspect of the Winter 2027_2028 BESS RFP or a COP; or (ii) to perform a specific function in support of the RFP Process.
- **Winter 2027_2028 BESS RFP:** GPC's Winter 2027_2028 Battery Energy Storage System Request for Proposals, which is expected to be issued by GPC to the marketplace on the date approved by the Commission and which will identify the utility scale resources to be procured as set out in the 2023 IRP Update.

2. Identification and Separation. By no later than the RFP Service Date, the Evaluation Team will be separately identified and physically segregated from the COP Team and any Bid Team for purposes of all activities comprising the RFP Process. A list of the name and title of each member of the Evaluation Team, COP Team, and any Bid Team will be filed with the Commission and with the IE.

3. Evaluation Team and Bid Team or COP Team Communication (if Applicable). There will be no communication, either direct or indirect, between any Evaluation Team member, any COP Team member, and any Bid Team member from the RFP Service Date through the RFP Conclusion regarding the Winter 2027_2028 BESS RFP, any RFP document, or any aspect of the RFP Process, except: (i) necessary communications as may be made through the IE; and (ii) if applicable, discussion between the Evaluation Team and any Bid Team to conform a final Awarded Contract if the Bid Team submits a winning Bid(s). For avoidance of doubt, no COP Team member may be a member of the Bid Team or communicate with the Bid Team during the RFP Process about any aspect of the RFP Process.

4. Communication with Bidders. After the RFP Service Date, no member of the Evaluation Team may have direct or indirect contact or communication with a Bidder pertaining to the Winter 2027_2028 BESS RFP, any RFP document, or any aspect of the RFP Process, except through the IE as further described in

the RFP Rule, until the time a Bid advances as a winning Bid and conforming of the final Awarded Contract has begun with the Bidder, or the RFP Conclusion.

5. Information Sharing Prohibited. At no time following the RFP Service Date may an Evaluation Team member share any non-public information regarding the RFP Process with any Bidder or the COP Team, unless the precise same information is shared with all Bidders and the COP Team in the same manner and at the same time. If any Bidder or the COP Team attempts to directly contact a member of the Evaluation Team regarding the Winter 2027_2028 BESS RFP, any RFP document, or any aspect of the RFP Process, the Evaluation Team member must direct the person to the IE for all information and must report the communication to the IE.

6. Specialized Technical Support Personnel; No Conduit. Despite any other provision of these Standards, there may be certain Specialized Technical Support Personnel who, from time to time, need to provide support to both the Evaluation Team and the COP Team. Specialized Technical Support Personnel who need to provide any support to both the Evaluation Team and the COP Team must be identified on both the Evaluation Team and COP Team lists as a member of both teams no later than the time the person first supports both teams. Any non-public RFP communication or information exchanged with any person serving on both the Evaluation Team and the COP Team must be limited to the scope of the person's applicable role. In no event will any person act as a conduit of any communication between or among members of either team that would violate the RFP Rule or these Standards.

7. Evaluation Team Acknowledgement. On or before the RFP Service Date, as a condition to serving on the Evaluation Team, each Evaluation Team member must execute the Acknowledgement at **Exhibit A-1**, agreeing to abide by these Standards. If any new member is added to the Evaluation Team following the RFP Service Date, the new member must execute the Acknowledgement: (i) agreeing to abide by these Standards; and (ii) affirming that the member has not engaged in any communication on or after the RFP Service Date that would have violated these Standards if the new member had been a member of the Evaluation Team as of the RFP Service Date. GPC, in coordination with the Evaluation Team, will file an initial Evaluation Team list with the Commission and the IE on the RFP Service Date and, if applicable, will file updated list(s) with the Commission and provide Acknowledgement(s) from new Evaluation Team member(s) to the IE periodically during the RFP Process, as required by RFP Rule.

8. Evaluation Team Reaffirmation. At RFP Conclusion, each Evaluation Team member must reaffirm compliance with these Standards. GPC, in coordination with the Evaluation Team, will promptly file a final Evaluation Team list with the Commission and will provide all Evaluation Team reaffirmation Acknowledgements to the IE.

9. COP Team Acknowledgement. On or before the RFP Service Date, as a condition to serving on the COP Team, each COP Team member must execute the Acknowledgement, agreeing to abide by these Standards. If any new member is added to the COP Team following the RFP Service Date, the new member must execute the Acknowledgement at **Exhibit A-2**: (i) agreeing to abide by these Standards; and (ii) affirming that the member has not engaged in any communication on or after the RFP Service Date that would have violated these Standards if the new member had been a COP Team member as of the RFP Service Date. GPC, in coordination with the COP Team, will file an initial COP Team list with the

Commission on the RFP Service Date and, if applicable, will file updated list(s) and provide Acknowledgement(s) from new COP Team member(s) to the IE periodically during the RFP Process.

10. COP Team Reaffirmation. At RFP Conclusion, each member of the COP Team must reaffirm compliance with these Standards. GPC, in coordination with the COP Team, will promptly file a final COP Team list with the Commission and will provide all COP Team reaffirmation Acknowledgements to the IE.

11. Bid Team Acknowledgement (if Applicable). On or before the RFP Service Date, as a condition to serving on the Bid Team, each Bid Team member must execute an acknowledgement, agreeing to abide by the RFP Rule. If any new member is added to the Bid Team following the RFP Service Date, the new member must execute an acknowledgement: (i) agreeing to abide by the RFP Rule; and (ii) certifying that the member has not engaged in any communication on or after the RFP Service Date that would have violated the RFP Rule if the new member had been a member of the Bid Team as of the RFP Service Date. The Bid Team will file an initial Bid Team list with the Commission and the IE on the RFP Service Date and, if applicable, will file updated list(s) and provide acknowledgement(s) from new Bid Team members periodically during the RFP Process, as required by RFP Rule.

12. Bid Team Reaffirmation (if Applicable). At the Awarded Contract Execution Date, as applicable, each Bid Team member must reaffirm compliance with all restrictions and conditions of the RFP Rule. The Bid Team will promptly file a final Bid Team list with the Commission and will provide all Bid Team reaffirmation acknowledgements to the IE.

EXHIBIT A-1

Standards of Conduct End of Process Acknowledgement

(Evaluation Team)

I, _____, hereby acknowledge:

1. I was employed by Choose an item. while I assisted Georgia Power Company with its Winter 2027_2028 BESS Request for Proposals as an Evaluation Team member, as defined in the attached "Standards of Conduct for Georgia Power Company's Winter 2027_2028 BESS Request for Proposals" ("**Standards of Conduct**").

2. I previously executed an Evaluation Team Standards of Conduct Acknowledgement, and I hereby state that I did not engage in any communication on or after the RFP Service Date that violated the Standards of Conduct.

3. I further state that I abided by all restrictions and conditions in the Standards of Conduct.

Signed: _____

Dated: _____