

Georgia Power Company's Application for the Certification of Supplemental Resources for 2028-2031 Capacity

Docket No. 56310

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Supplemental Resources for 2028-2031 Capacity

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Executive Summary

As evidenced in the 2025 Integrated Resource Plan (“IRP”), Georgia continues to be a top state in which to live and do business. Georgia Power Company (“Georgia Power” or the “Company”) is proud to serve Georgia’s communities, and the Company’s commitment to its customers remains the cornerstone of its business. With the constructive oversight of the Georgia Public Service Commission (“Commission”), Georgia Power has consistently provided clean, safe, reliable, and affordable electric service to its 2.8 million customers while supporting economic growth that benefits all Georgians. The economic growth taking place in Georgia has resulted in increasing energy needs for the state – requiring the expedient addition of capacity resources to maintain the reliability and resiliency that Georgia Power customers deserve and expect.

As explained in the Company’s Application for the Certification of the Winter 2027-2028 (“Winter 27_28”) Battery Energy Storage System (“BESS”) Request for Proposal (“RFP”) (“Winter BESS Certification”) in Docket No. 56258 and the Company’s Application for the Certification of the 2029-2031 All-Source Capacity RFP (“All-Source Certification”) in Docket No. 56298, capacity needs remain beyond the resources procured through those RFPs to meet the needs of Georgia Power customers beginning in the winter of 2027/2028 through winter of 2030/2031.¹

This Application for the Certification of five NextEra Energy Resources (“NEER”) BESS Power Purchase Agreements (“PPAs”) with accompanying solar PPA amendments, Wadley BESS project with solar PPA amendment, Tenaska Heard County PPA, and Mississippi Power Company (“MPC”) PPA amendment (collectively the “Application”) is made pursuant to O.C.G.A. § 46-3A-4 and Commission Rules 515-3-4-.04(3)(f), 515-3-4-.07(2), 515-3-4-.07(5), and 515-3-4-.08. These resources are collectively referred to as the “Supplemental Resources” in this Application since Georgia Power plans on using these resources to supplement those procured in the Winter 27_28 BESS RFP and 2029-2031 All-Source RFP.

The Winter 27_28 BESS RFP resulted in the proposed certification of one 200 MW BESS resource, Twiggs County BESS, paired with an existing solar facility currently under PPA with Georgia Power. With the February 2025 Load Forecast filed with the Company’s 2025 IRP Rebuttal Testimony in Docket No. 56002 and approved by the Commission at its July 15, 2025, Administrative Session, a capacity need of more than 150 MW remains for the winter 2027/2028 timeframe even considering the addition of the Twiggs County BESS project. After soliciting refreshed, earlier commercial operation dates (“COD”) from participants in the 2029-2031 All-Source RFP in February 2025, the Company did not identify any project that could interconnect and deliver power on a firm basis to meet needs with a 2027 COD. Further, the 2029-2031 All-Source RFP also did not procure sufficient resources to meet the capacity needs in winters of 2028/2029 through 2030/2031. Therefore, the Company requests approval of Supplemental Resources through RFP exemptions under Commission Rules 515-3-4-.04(3)(f)(3) and (6).

¹ The Winter BESS and All-Source Certification requests highlighted that Georgia Power would investigate additional resource options to meet additional customer needs and bring such resources for Commission approval accordingly.

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This Application includes the following Supplemental Resources portfolio identified by Georgia Power to fulfill the approximately 150-850 MW capacity needs in winters 2027/2028 through 2030/2031:

- 646 MW from five BESS PPAs with NEER entities with existing solar PPA amendments;
- 260 MW Wadley BESS Company-owned project with existing solar PPA amendment;
- 930 MW² Tenaska Heard County PPA for existing simple-cycle combustion turbines (“CTs”); and
- 50 MW MPC PPA Amendment to add calendar year 2029.

When engaging with NEER to identify potential options for additional capacity, five locations were identified where Georgia Power has existing NEER solar PPAs that are available to be paired with BESS resources. In addition, the NEER Wadley solar site was offered as an incremental option where Georgia Power could develop a paired BESS project with a 2027 COD. Therefore, the Company has executed a Real Estate Purchase Option Agreement (“REPO”) with the landowner of the Wadley Solar site to secure the associated land parcel and is pursuing a Cooperation and Development Transfer Agreement (“DTA”) with NEER related to development records, interconnection rights, and shared facilities. An executed DTA for the Wadley BESS Project will be provided as a supplemental filing to this Application when available.

The Company has engaged Burns & McDonnell under an existing Master Engineering, Procurement, and Construction (“EPC”) Agreement (“Master EPC Agreement”) to serve as the EPC contractor for the Wadley BESS project. Burns & McDonnell, who also serves as the Company’s EPC contractor for the ongoing Robins BESS and McGrau Ford BESS projects, is well known for its extensive experience within the power industry, demonstrating its capability to contribute significantly to this project. The Company’s experience with Burns & McDonnell has established a solid foundation that has validated and reinforced the effectiveness of Burns & McDonnell’s execution strategies. In addition, the Company has experienced personnel in place to provide oversight and appropriate execution of the Wadley BESS project and is highly confident in its ability to successfully execute this project. Burns & McDonnell will perform its EPC scope under two Work Authorizations issued under the Master EPC Agreement. The Master EPC Agreement and Work Authorization I are provided with this Application, and the executed Work Authorization II, which will include the full construction scope and schedule for the project, will be provided as a supplemental filing to this Application when available.

In addition, Georgia Power has also included a copy of the Sale & Purchase Agreement (“SPA”) with Tesla for the supply of the Megapack 2 XL for the Wadley BESS project. The Tesla Megapack 2 XL is a utility-scale energy storage solution with a modular design that provides for rapid deployment of BESS for high-capacity, large-scale projects. Through the ongoing 765 MW BESS portfolio³ and projects proposed in the Winter 27_28 BESS RFP and 2029-2031 All-Source RFP, the Company has focused on developing

² The Tenaska Heard County PPA includes 930 MW summer capacity on natural gas and is operationally capable of up to 1,080 MW winter capacity on fuel oil. Georgia Power is evaluating transmission availability above the currently designated winter capacity of 945 MW. Therefore, a 945 MW winter capacity rating is reflected in the evaluations of this resource until the full 1,080 MW is confirmed.

³ The ongoing 765 MW BESS portfolio includes the Robins, Moody, McGrau Ford Phases I and II, and Hammond Phase I BESS projects approved for certification by the Commission on December 12, 2024.

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relationships with a leading supplier who stands behind operational guarantees to ensure successful project deployment for customers' benefit.

Georgia Power currently has the Tenaska Heard County CT resource under a PPA through May 31, 2030, as Exelon Heard Units 1-6. The new Tenaska Heard County PPA would secure this existing market resource starting June 1, 2030, for a 20-year term. Similarly, the Company has an existing MPC PPA for 750 MW for 2024-2028 from the 2023 IRP Update. The PPA amendment in this Application would extend the Company's access to 50 MW for 2029. The Tenaska Heard County PPA and MPC PPA amendment will allow the Company to leverage existing resources for the benefit of Georgia Power customers.

Certifying the Supplemental Resources will allow Georgia Power to continue providing reliable and cost-effective service to support the opportunities for continued customer growth while it navigates unique reliability resource planning challenges from this increasing customer demand. All Supplemental Resources will leverage existing transmission infrastructure. These projects save time and avoid the type of capital investment otherwise required to construct transmission interconnection facilities and transmission system upgrades for new resources, such as those needed to charge and discharge BESS resources.

Furthermore, the proposed BESS resources will also provide energy arbitrage benefits by optimizing energy savings by shifting energy from hours with a relatively low system marginal cost to hours with a relatively high system marginal cost. The NEER BESS PPAs and Wadley BESS project will be primarily charged by the existing solar resources at each site. As a result, each of these BESS resources will firm up the winter planning capacity of the existing solar facilities at these sites by storing energy that can then be dispatched by system operators to benefit the grid.

The Company requests that the Commission approve this Application and certify each of the Supplemental Resources as in the public interest and necessary to meet customer demand and reliability needs through winter 2030/2031 and allow for the continued economic growth of Georgia.

Certification Requirements

Description of the Proposed Capacity Resources

Pursuant to O.C.G.A. § 46-3A-4, Georgia Power seeks to certify PPAs, PPA amendments, and a Company-owned BESS project that Georgia Power will utilize to support an economical and reliable supply of capacity and energy for the Company's retail customers. Specifically, the Company seeks to certify:

- Five NEER BESS PPAs for 4-hour battery energy storage systems to be paired with NEER solar facilities for which Georgia Power has existing PPAs. The NEER BESS PPAs each have a required COD of November 30, 2027, and a 25-year term. See Figure 1 for the resource sites and capacities of each BESS PPA.

Figure 1 – BESS PPAs at existing NEER Solar PPAs

Nominal Capacity (MW)	
Decatur BESS PPA	200
Dougherty County BESS PPA	120
Washington County BESS PPA	150
White Oak BESS PPA	76
White Pine BESS PPA	100

- A 260 MW Wadley BESS project paired with the NEER Wadley Solar facility for which Georgia Power has an existing solar PPA. Georgia Power is requesting to own and operate this project with an expected COD of November 30, 2027. This 4-hour duration BESS project will be comprised of Tesla Megapack lithium-iron phosphate ("LFP") battery cell technology and power conversion systems with site round-trip efficiency ("RTE") of approximately **REDACTED**. This RTE is based on the Megapack 2 XL specification sheet, and the guaranteed RTE is outlined in the SPA, which includes losses up to the Point of Measurement ("POM"). The project is designed with an initial storage capacity and augmentation schedule to ensure adequate energy capacity is maintained over the 20-year asset life.
- Six PPA amendments to the existing NEER solar PPAs to allow for the paired operation of the NEER BESS and Wadley BESS⁴ projects with the existing solar facilities. As originally certified, each of the existing PPAs at the six NEER sites were for solar-only facilities as shown in Figure 2. As such, each existing solar PPA must be amended to incorporate the addition of BESS resources.

More specifically, the Company has proposed to amend the existing NEER solar PPAs as necessary to: (i) allow the seller to deliver, and Georgia Power to receive and pay for, solar energy at a metering point before the point of interconnection; (ii) ensure Georgia Power can dispatch solar energy on automatic generation control ("AGC") and in parallel with the BESS; and (iii) address the interconnection of the BESS to the existing solar point of interconnection, including any outage to the existing facility caused by BESS commissioning, testing, and interconnection. The White Oak, White Pine, and Dougherty County solar PPA amendments also extend the solar PPA term to align the term length with the associated BESS PPA. The Dougherty County solar PPA amendment also

⁴ The Wadley Solar PPA Amendment will be provided as a supplemental filing to this Application when available.

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allows the NEER counterparty to “repower” the existing solar facility by upgrading and replacing equipment in a manner that will incrementally increase the solar facility’s generating capacity. The incremental energy made available through the repower project will, subject to Commission approval, be paid for by Georgia Power at the original contract energy prices, escalated per the originally agreed escalation rate.

Figure 2 – Existing NEER Solar PPAs

Solar PPAs requesting amendment	Nominal Capacity (MW)	Associated RFP for Original Certification	Original Certification Docket No.	Date of Certification Final Order
White Oak Solar	76	2015/2016 Advanced Solar Initiative (“ASI”) Prime RFP	38877	December 18, 2014
White Pine Solar	100			
Dougherty County Solar	120	2018/2019 Commercial & Industrial (“C&I”) Renewable Energy Development Initiative (“REDI”) US RFP	41734	April 5, 2018
Decatur Solar Energy Center	200	2022/2023 Utility Scale (“US”) Renewable RFP	43814	July 7, 2021 (amendment approved April 22, 2022)
Wadley Solar	260			
Washington County Solar	150			

- A PPA with Tenaska Georgia Partners, L.P. for six dual-fuel CTs at the Heard County facility for 930 MW summer capacity and 945 MW winter capacity.⁵ Delivery under this 20-year PPA would begin on June 1, 2030, directly following the expiration of Georgia Power’s existing PPA with this facility on May 31, 2030.
- A PPA amendment with MPC for 50 MW of nominal capacity and associated energy to add an additional year, January 1, 2029, through December 31, 2029, to the Company’s current PPA ending on December 31, 2028. Georgia Power and MPC are affiliates and retail operating companies of Southern Company.

To facilitate quick deployment, the NEER BESS PPAs and Wadley BESS project will utilize existing solar interconnections and will be charged primarily by the existing solar facility at each site. The BESS equipment will, however, be constructed with the capability to grid-charge if Georgia Power chooses in the future to pursue that option on the transmission system.

These Supplemental Resources will serve as dispatchable capacity resources that provide customers with reliable and economical sources of electricity required to meet capacity needs between 2028 and 2031. In addition, the resources will form a critical component of the Company’s diverse generation portfolio,

⁵ See footnote 1.

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helping ensure the Company has a mix of technologies enabling reliable and resilient electric service for all customers during all hours.

Terms of Purchase

The terms of purchase for the NEER BESS PPAs, the NEER Solar PPA amendments, the Tenaska Heard County PPA, and the MPC PPA amendment are found in the accompanying PPAs and PPA amendments included in the Technical Appendix to this Application.

Cost of Purchase

The costs of the NEER BESS PPAs, the NEER Solar PPA amendments, the Tenaska Heard County PPA, and the MPC PPA amendment are found in the accompanying PPAs and PPA amendments included in the Technical Appendix to this Application. See Attachment A for the Supplemental Resources Economic Analysis document for the cost-benefit analysis associated with these resources.

2025 IRP Impacts

This Application is consistent with the 2025 IRP Stipulation in Docket No. 56002, approved by the Commission at its July 15, 2025, Administrative Session, as well as the processes used to evaluate the 2029-2031 All-Source RFP. Consistent with Items 2.b. and 2.c. of the 2025 IRP Stipulation, the Company will update the capacity needs in this Application in October 2025 with the Budget 2026 ("B2026") load forecast, to allow the Commission to appropriately determine necessary generation resources to certify.

The Application includes by reference the following material from the Georgia Power 2025 IRP:

- (1) the February 2025 Load and Energy Forecast, as filed with the Company's Rebuttal Testimony on June 9, 2025; and
- (2) the Resource Mix Study, as filed on January 31, 2025.

Revised Near-Term Action Plan

Figures 3 and 4 below represent Georgia Power's projected winter and summer capacity needs for 2025-2044. The Company developed these figures using the same information as Table 8.1B from the 2025 IRP Main Document. However, Georgia Power has updated the capacity needs charts to incorporate: (i) the proposed Supplemental Resources, (ii) the results of the 2029-2031 All-Source RFP, (iii) the results of the Winter 27_28 BESS RFP, (iv) the results of the CARES 2023 Utility Scale Renewable RFP, (v) the Company's February 2025 Load Forecast provided with Georgia Power's 2025 IRP Rebuttal Testimony on June 9, 2025, and (vi) the approved requests from the 2025 IRP, as agreed upon in the 2025 IRP Stipulation and approved by the Commission for Docket Nos. 56002 & 56003. These charts confirm the need for the proposed Supplemental Resources to meet capacity needs in winter 2027/2028 through winter 2030/2031.

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Figure 3 – Georgia Power Winter Capacity Need with 2028-2031 Supplemental Resources

Year	Peak Demand (MW) (A)	Owned Generating Capacity (MW) (B)	Purchased Generating Capacity (MW) (B,C)	Dispatchable DSOs (MW) (B)	Total Capacity (MW) (B)	Capacity Required to Meet GPC Target (MW) (D)	GPC Reserve Margin (%)
2024/2025	16,236	14,306	5,913	649	20,868	(637)	29%
2025/2026	16,750	15,216	6,012	710	21,939	(1,068)	31%
2026/2027	17,808	16,597	6,242	714	23,553	(1,364)	32%
2027/2028	19,501	17,280	7,085	714	25,079	(676)	29%
2028/2029	21,696	19,988	6,675	717	27,379	(230)	26%
2029/2030	23,517	22,206	6,660	719	29,585	(157)	26%
2030/2031	24,769	24,680	6,631	723	32,035	(1,040)	29%
2031/2032	25,590	24,709	6,681	725	32,116	(94)	26%
2032/2033	26,160	24,718	6,626	728	32,073	662	23%
2033/2034	26,436	24,728	6,623	731	32,081	999	21%
2034/2035	26,623	24,258	5,306	733	30,297	3,018	14%
2035/2036	26,706	20,106	4,725	734	25,565	7,854	-4%
2036/2037	26,923	20,106	4,658	739	25,503	8,187	-5%
2037/2038	27,170	20,106	4,308	761	25,174	8,824	-7%
2038/2039	27,548	19,457	4,308	769	24,534	9,938	-11%
2039/2040	27,851	19,457	3,948	778	24,183	10,669	-13%
2040/2041	28,222	19,457	3,841	786	24,084	11,231	-15%
2041/2042	28,605	19,457	3,838	795	24,091	11,704	-16%
2042/2043	29,028	19,457	3,835	806	24,099	12,225	-17%
2043/2044	29,446	19,457	3,835	816	24,108	12,739	-18%

Notes

(A) Territorial Load requirements less non-dispatchable demand-side options ("DSOs").

(B) Values stated in effective load carrying capability ("ELCC") terms. ELCCs for All-Source RFP and Supplemental Resources are estimated at the resource level based on projected commercial operation dates.

(C) Includes territorial and imported power purchases.

(D) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin, resulting from a System Target Reserve Margin of 25.50% (2025-2027) and 26% (2028 and beyond).

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Figure 4 – Georgia Power Summer Capacity Need with 2028-2031 Supplemental Resources

Year	Peak Demand (MW) (A)	Owned Generating Capacity (MW) (B)	Purchased Generating Capacity (MW) (B,C)	Dispatchable DSOs (MW) (B)	Total Capacity (MW) (B)	Capacity Required to Meet GPC Target (MW) (D)	GPC Reserve Margin (%)
2025	17,716	13,868	7,410	729	22,007	(999)	24%
2026	18,480	14,760	7,522	803	23,085	(1,173)	25%
2027	19,971	16,080	7,522	808	24,410	(729)	22%
2028	21,981	17,003	8,059	807	25,869	307	18%
2029	24,373	18,626	7,654	810	27,090	1,935	11%
2030	25,934	22,011	7,616	814	30,441	443	17%
2031	27,081	23,042	8,789	819	32,651	(401)	21%
2032	27,789	23,055	9,089	823	32,967	125	19%
2033	28,289	23,069	9,033	827	32,929	759	16%
2034	28,588	23,082	9,019	831	32,933	1,111	15%
2035	28,778	22,615	7,302	834	30,751	3,520	7%
2036	28,918	18,584	7,174	839	26,596	7,840	-8%
2037	29,188	18,584	7,015	845	26,444	8,314	-9%
2038	29,385	18,584	6,791	851	26,226	8,768	-11%
2039	29,638	17,935	6,791	857	25,583	9,711	-14%
2040	29,795	17,935	6,408	871	25,214	10,267	-15%
2041	30,150	17,935	6,356	882	25,173	10,732	-17%
2042	30,542	17,935	6,346	893	25,174	11,197	-18%
2043	30,946	17,935	6,341	904	25,180	11,673	-19%
2044	31,419	17,935	6,338	914	25,188	12,227	-20%

Notes

(A) Territorial Load requirements less non-dispatchable DSOs.

(B) Values stated in ELCC terms. ELCCs for All-Source RFP and Supplemental Resources are estimated at the resource level based on projected commercial operation dates.

(C) Includes territorial and imported power purchases.

(D) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin, resulting from a System Target Reserve Margin of 19.50% (2025-2027) and 20% (2028 and beyond).

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Commission Rule Exception to the RFP Requirement in Rule 515-3-4-.04

To enable Georgia Power to continue to reliably serve its customers, the Company is requesting Commission approval to develop, procure, or purchase the capacity and energy from the new supply-side capacity resources identified within this Application for Supplemental Resources. To accomplish this, the Company is following Commission rules for identification and selection of capacity resources pursuant to Commission Rule 515-3-4-.04. To achieve the schedule required to meet capacity needs, the Company is requesting Commission approval under one or more of the seven exceptions to the RFP process set forth by Commission Rule 515-3-4-.04(3)(f). Authorizing the Company to procure resources pursuant to one or more of these exceptions will allow for the timely deployment of necessary supply-side resources, mitigating risks where the Winter 27_28 BESS RFP and 2029-2031 All-Source RFP did not provide enough capacity or will not offer enough firm and dispatchable resources to reliably serve customers.

Within the Commission Rules, two exceptions to the Commission's RFP requirement apply to the resources identified in this Supplemental Resources filing. First, Commission Rule 515-3-4-.04(3)(f)(3) provides an exception for supply-side capacity resources of extraordinary advantage that require immediate action. Second, through Commission Rule 515-3-4-.04(3)(f)(6), the Commission has the authority to exclude from the RFP process any new supply-side resources.

Since the Company identified capacity needs after the results of the Winter 27_28 BESS RFP and 2029-2031 All-Source RFP, another RFP cannot be conducted fast enough for the Company to develop, procure, or purchase energy and capacity to meet this near-term capacity need. Further, given the long lead timelines to construct new resources and any additional transmission assets needed to accommodate such a resource, the timeline to procure resources through an RFP would extend past the Company's resource needs of the winters 2027/2028 and 2030/2031. Therefore, the Company has identified a combination of additional system length, existing resources, and the option to pair new BESS resources with existing solar facilities to leverage access to available capacity through resources with established interconnections and minimal transmission upgrades. It is in customers' best interest for the Company to certify the Supplemental Resources, which are available to meet customer demand within the timeframe of the near-term capacity need.

By procuring resources in accordance with these RFP exceptions in addition to procuring resources through the typical RFP process, Georgia Power can continue providing its customers with reliable service and meet the timelines of customers' needs. It is critical that the Company leverage various procurement options to maintain a diverse resource portfolio that includes market resources, Company-owned resources, and a balance of resource technologies to ensure a reliable and efficient generation fleet.

The Company requests Commission authorization to procure the resources described above through one or more of the exceptions to the Commission's RFP process set forth in Commission Rules 515-3-4-.04(3)(f)(3) and 515-3-4-.04(3)(f)(6), as deemed appropriate and applicable by the Commission.

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Proposed Ratemaking Treatment of Costs for PPAs

Georgia Power proposes to recover the costs associated with the NEER BESS PPAs, the NEER Dougherty County Solar PPA amendment, the Tenaska Heard County PPA, and the MPC PPA amendment in its retail cost of service, consistent with other PPAs certified by the Commission and the requirements of O.C.G.A. § 46-3A-8.

Additional Sum for PPAs

As provided in O.C.G.A. § 46-3A-8, the Company is entitled to an additional sum for purchased power resources. When calculating an additional sum, the statute requires that lost revenues, changed risks, and an equitable sharing of benefits between the utility and its retail customers be considered.

Consistent with the additional sum approved by the Commission for capacity purchases in the 2022 and 2025 IRPs, the Company is requesting an additional sum of \$3/kW-year for the NEER BESS PPAs, the Tenaska Heard County PPA, and the MPC PPA amendment.

Analysis of Transmission Impacts

There are no transmission facilities added, modified, or avoided as a result of the Supplemental Resources in this Application. No transmission delivery screens were required for the proposed NEER BESS PPAs or Wadley BESS project since the BESS will initially charge from the existing solar facilities at each site, and the output of the facilities has previously been studied and designated. Similarly, as continuations of existing PPAs, the Tenaska Heard County PPA and the MPC PPA amendment are already modeled throughout the Company's full transmission study horizon, and the Company will exercise this option to continue transmission service. Therefore, no further transmission screens are needed for the capacity ratings evaluated in this Application.

Description of Legal Relationships

NEER PPAs

NEER, the parent company of each special purpose entity counterparty to the NEER BESS PPAs and existing solar PPAs, has been a successful participant in Georgia Power's renewable RFPs for almost a decade. Georgia Power and NEER affiliates are currently parties to multiple PPAs awarded in prior Georgia Power RFPs, including each of the existing solar PPAs at issue in this Application. Florida Power & Light, a NEER affiliate, co-owns Plant Scherer Units 3 and 4.

Wadley BESS

In addition to the contractual relationships with NEER described above for the PPAs and applicable here to the proposed Wadley BESS, there have been previous contractual relations wherein one or more suppliers involved in the Wadley BESS project furnished equipment and/or services to one or more affiliates of the Southern Company. Other than these supply and services agreements, no other legal or contractual relations exist among the parties.

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Tenaska Heard County PPA

No prior legal or contractual relationship exists between Georgia Power and Tenaska Georgia Partners, L.P. While the Tenaska Heard County Facility is currently committed to Georgia Power, the existing contract is between Exelon Generation Company, LLC and Georgia Power.

MPC PPA Amendment

Georgia Power and MPC are affiliates and retail operating companies of Southern Company.

Wadley BESS (260 MW) Construction Information

Cost-Benefit Analysis

Included as Attachment A to this Application is the Company's Economic Analysis with a cost-benefit analysis of all the Supplemental Resource options reflecting the costs and schedules from the PPAs, as well as the EPC and SPA Agreements for the Wadley BESS project. This cost-benefit analysis uses the same methodology and assumptions as the 2029-2031 All-Source RFP evaluation.

Site Selection Analysis

NEER presented to the Company a portfolio of resources that included five BESS PPA opportunities and one opportunity to develop a Company-owned BESS project. As the portfolio evolved, NEER offered the Wadley BESS project as the Company-owned development opportunity. The Company and NEER then coordinated to identify and procure a real estate purchase option for a site close to the existing Wadley solar facility that would support development of the Wadley BESS project. NEER presented two site options to the Company. Of the two options, the Company selected the current Wadley BESS project site because it presented minimal risk relative to the other site with respect to environmental impacts. The current Wadley BESS project site was also selected for its expedited deployment capabilities, primarily attributed to the existing solar facility near this location, which ensures known transmission deliverability. This strategic choice allows the Company to leverage existing infrastructure, thereby eliminating potential expenses and long lead time projects associated with interconnection and network upgrades.

Fuel Use

The NEER Wadley solar facility will be the primary fuel source for the Wadley BESS facility. The BESS will store the renewable energy during daylight hours and discharge the energy as needed to support grid operations and meet capacity needs. Additionally, the Wadley BESS will primarily serve as a cost-effective, dispatchable capacity resource by optimizing energy savings. It will achieve this optimization by shifting the energy from hours with relatively low system marginal cost to hours with relatively high system marginal cost. While it will primarily charge from solar energy, the BESS equipment has the potential to charge from the grid if Georgia Power chooses in the future to pursue that option on the transmission system.

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Estimated Annual Costs

Figure 5 below includes estimated annual costs for the Wadley BESS Project. All costs are in thousands of dollars in nominal terms.

Figure 5 – Wadley BESS Estimated Annual Costs

Year	Estimated Annual Depreciation	Estimated Annual Debt and Equity Financing Costs on Capital Investment	Estimated Annual Income Taxes on Capital Investment	Estimated Fixed O&M	Estimated Insurance	Estimated Property Taxes	Estimated Annual Capital Additions
2025	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2045	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2046	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2047	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Estimated Annual Variable Costs

The Wadley BESS will serve as a cost-effective, dispatchable capacity resource that will optimize energy savings by shifting the energy from hours with relatively low system marginal cost to hours with a relatively high system marginal cost. The variable costs for the Wadley BESS include the cost to charge the battery and losses during charging and discharging. These costs are optimized by charging during low-cost periods and discharging during high-cost periods, although the exact cost to charge, and benefits of discharge, will vary based on market conditions.

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In addition, the BESS will fulfill a wider array of system and grid requirements beyond the more commonly recognized benefits of capacity value and energy value. BESS can be instrumental in providing cost-effective essential services for grid reliability, particularly operating reserves, leading to reductions in total system operational costs. As the energy mix evolves, these services and the role of BESS will likely become increasingly important in response to intermittent resource penetration and potential carbon pressure. Please see “Attachment B – Wadley BESS Operational Data TRADE SECRET” for annual operational forecasts.

Rates of Escalation of Cost

Post in-service capital, insurance, and operation and maintenance (“O&M”) costs that are fixed are escalated per an assumed inflation rate of **REDACTED**, unless otherwise defined in contractual agreements. The inflation rate is based on a forecast of Gross Domestic Product Implicit Price Deflator.

Total Estimated Annual Average Cost per kWh

See “Estimated Annual Variable Costs” section above for applicable information for BESS technology.

Equivalent Availability Factors

See “Estimated Annual Variable Costs” section above and “Attachment B – Wadley BESS Operational Data TRADE SECRET” for applicable information for BESS technology.

Capacity Factors and Duty Cycle

See “Estimated Annual Variable Costs” section above and “Attachment B – Wadley BESS Operational Data TRADE SECRET” for applicable information for BESS technology.

Efficiency

The Tesla Megapack 2 XL RTE under standard test conditions is **REDACTED**. The Wadley BESS Guaranteed Site RTE at commissioning completion is outlined in the SPA and Long Term Commitments Agreement (“LTCA”).

Unit Lifetime

The unit lifetime for the BESS is 20 years, and this serves as the basis for both the accounting book life and the engineering design life.

Estimated Environmental Impact

Other than impacts associated with land use for the new facility described below, Georgia Power does not anticipate that the BESS facility will have any environmental impacts related to the specific emission, production, or usage data categories outlined in GPSC Rule 515-3-4-.07 (2)(a)(3)(xi).

Georgia Power has reviewed environmental assessments and surveys completed for the Wadley site. During site development and operations, some intermittent environmental impacts may occur as a result of stormwater runoff due to precipitation. However, these impacts will be regulated by, and in compliance with, applicable state and federal requirements.

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During facility operations, no direct air emissions or water usage are expected except as encountered during an emergency or other unplanned event. Some stormwater runoff is expected as a result of direct rainfall, but this will be controlled by measures installed during facility construction and maintained for the life of the facility. Some limited solid waste disposal may occur as a result of normal operations. Battery recycling is expected as the BESS achieve their expected operational lifespan. Ash, scrubber sludge, and high- and low-level nuclear waste will not be produced. Spent nuclear fuel will not be created. Approximately 50 acres of land will be used by this BESS project for the facility footprint, interconnection substation, and any associated utility tie line(s), which provides adequate space for future augmentation needs.

Required federal, state, and local permitting have been evaluated and, where applicable, will be included within the scope of Work Authorization II issued under the Master EPC Agreement, and applicable requirements will be met at the appropriate times to meet all compliance obligations.

Lead Time

Current expected lead times for major procurement items and services, medium-voltage and low-voltage electrical equipment, site building fabrication, medium-voltage transformers, the BESS, engineering, and geotechnical design work, are detailed in “Attachment D – Wadley BESS Preliminary Activities and Critical Path Schedule TRADE SECRET”. The final Wadley BESS Activities and Critical Path Schedule will be provided in the Work Authorization II, which will be provided as a supplemental filing to this Application when available. The generation step-up (“GSU”) transformers are on order and are expected to arrive in the first quarter of 2027.

Potential Socioeconomic Impacts

Wadley BESS will provide additional electric service reliability to Georgia and promote additional regional economic growth and long-term tax base. In addition, and as discussed previously in this Application, Wadley BESS will support the extraordinary economic growth occurring throughout Georgia. Supporting Georgia’s growth will have both near-term and long-term positive economic impacts on the entire state’s economy and will benefit all Georgia Power customers.

Special Design Features

The proposed project will utilize the Tesla Megapack 2 XL, which is a battery storage unit capable of charging and discharging real power and injecting and absorbing reactive power. The system is unique compared to other available BESS in the market because it arrives at site fully integrated and capable of outputting 480V alternating current (“AC”) power. This integration greatly reduces commissioning timelines and allows the Megapack 2 XL thermal system to operate prior to backfeed being available at the site. The Megapack 2 XL is modular design and includes multiple inverters per container, making the loss of one inverter negligible to the system’s overall performance. Each 4-hour container possesses a storage capacity of over 3,900 kWh.

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Total Cost Estimate

Development of Wadley BESS is estimated to cost approximately **REDACTED**, which is the total of the engineering, construction, oversight, and associated procurement cost of **REDACTED**, pre-commercial allowance for funds used during construction (“AFUDC”) cost of **REDACTED**, and ad valorem taxes of **REDACTED**.

Cost Expenditure Plan

Figure 6 below identifies the cost expenditure plan for the Wadley BESS through 2027 for each line item category listed. Costs shown are in thousands of nominal dollars. Totals may not equal the sum of annual values due to rounding.

Figure 6 - Wadley BESS Cost Expenditure Plan

Category	2025	2026	2027	Total
Planning	REDACTED	REDACTED	REDACTED	REDACTED
Licensing	REDACTED	REDACTED	REDACTED	REDACTED
EPC Contract	REDACTED	REDACTED	REDACTED	REDACTED
SPA Contract	REDACTED	REDACTED	REDACTED	REDACTED
Engineering/Design & Construction	REDACTED	REDACTED	REDACTED	REDACTED
Startup	REDACTED	REDACTED	REDACTED	REDACTED
Transmission	REDACTED	REDACTED	REDACTED	REDACTED
Contingency	REDACTED	REDACTED	REDACTED	REDACTED
Total Engineering, Construction, Oversight, and Associated Procurement Cost	REDACTED	REDACTED	REDACTED	REDACTED
AFUDC	REDACTED	REDACTED	REDACTED	REDACTED
Ad Valorem	REDACTED	REDACTED	REDACTED	REDACTED
Total Cost Estimate	REDACTED	REDACTED	REDACTED	REDACTED

Descriptions of each category are provided below:

- Planning – PSI and environmental support.
- Licensing – Not applicable.
- EPC Contract – EPC contract costs.
- SPA Contract – BESS SPA contract cost.
- Engineering/Design & Construction – Internal technical engineering and services, interconnection, PSM, vendor quality, construction power, IT, onsite security, pre-commercial operation labor and supplies, supply chain support, project controls, legal, builder’s risk insurance, site controller, PWA review, distribution, and asset management.
- Start-Up – Test energy and BESS provider support.
- Transmission – Design and construction of project level substation, and generation tie-line to Wadley interconnection switching substation, including cost to interconnect.
- Contingency – Contingency.

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Major Contracts

Georgia Power will directly purchase the battery systems from Tesla under a SPA, with the EPC contractor responsible for the engineering, design, procurement of balance of system components, civil grading, and on-site equipment installation.

Engineering, Procurement, and Construction

In June 2025, the Company entered into Work Authorization I under the Master EPC Agreement with Burns and McDonnell. The Work Authorization I was executed based on information learned through a comprehensive Supply Chain RFP process for previously approved Georgia Power BESS projects, such as Robins BESS and McGrau Ford Phases I and II BESS. Burns and McDonnell will bring extensive experience in the engineering and construction of BESS and will leverage the site presence, design work, and construction for the Wadley BESS project.

As the appointed EPC contractor, Burns and McDonnell is tasked with the engineering, procurement, and construction services necessary for the design and installation of the BESS at the Wadley BESS site.

Under the terms of the Master EPC Agreement, Burns and McDonnell will deliver all services for a fixed price, adhering to a detailed scope of work and specifications for the Wadley BESS.

The Master EPC Agreement and Work Authorization I between Georgia Power and Burns and McDonnell is included in the Technical Appendix to this Application.

BESS Sale & Purchase Agreement

In July 2025, the Company finalized a SPA with Tesla for the procurement of an integrated battery energy storage system, the Megapack 2 XL, for deployment at the Wadley BESS project. This agreement was executed based on the information learned through the Company's comprehensive Supply Chain RFP process for previously approved BESS projects. Manufactured at Tesla's Megafactory in Lathrop, CA, the basic storage component in the Tesla Megapack 2 XL is the LFP battery cell. These cells are assembled into battery modules and integrated into the Megapack units. Megapack's modular design allows for easy scalability, connecting multiple units to meet project requirements. Each unit can store over 3,900 kWh of energy. The system arrives on-site fully integrated with initial testing completed, ready to deliver alternating current electrical output.

Safety is crucial in the Megapack design. Each unit undergoes rigorous testing to ensure safe operation. Tesla's advanced Battery Management System monitors and regulates temperature, voltage, and state-of-charge, ensuring optimal performance. Tesla's technology is well-proven and reliable with grid-scale batteries operational in over 65 countries.

The agreement includes a warranty that safeguards against equipment defects and guarantees against energy capacity degradation. In addition to the SPA, the Company will enter into an LTCA, which will provide an enhanced guaranteed energy retention capacity curve, as well as a Site RTE guarantee for each year of operation. The executed SPA and LTCA between Georgia Power Company and Tesla are included in the Technical Appendix to this Application.

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Cooperation and Development Transfer Agreement

The Company will enter a DTA with NEER to acquire the rights necessary to pair Wadley BESS project with the existing Wadley solar facility and interconnect to and share the existing Wadley solar facility interconnection facilities and point of interconnection. Under the DTA, NEER will also convey to the Company necessary project easements, books and records, and project reports. The DTA will also address the parties' execution of certain ancillary agreements, including a Shared Facilities Agreement, the Wadley Solar PPA Amendment, a Bill of Sale and Assignment Agreement, an Easement Agreement, and a Right of Entry Agreement for the Wadley solar facility. An executed DTA for the Wadley BESS Project will be provided as a supplemental filing to this Application when available.

Real Estate Purchase Option Agreement

In July 2025, the Company executed a REPO for an exclusive option to purchase a parcel of land close to the existing NEER Wadley solar facility. The optioned property is intended to serve as the site for the Wadley BESS project, which will be developed and paired with the Wadley solar facility. The REPO secures the Company's right to acquire the land upon exercise of the option and is structured to support coordinated development and interconnection planning to pair the Wadley BESS project with the existing Wadley solar facility. The executed REPO is included in the Technical Appendix to this Application.

Costs Associated with Construction

All construction costs are included in Figure 6 found in the above section titled "Cost Expenditure Plan."

AFUDC, Ad Valorem, and Sales Tax

Pre-commercial operation AFUDC and ad valorem tax costs are shown in thousands of nominal dollars in Figure 6. Sales tax costs are estimated as zero for the SPA and EPC purchases due to applicable sales and use tax exemptions. An estimate of sales tax for items that are not exempt from sales and use tax, such as real property materials and fixtures, is not available.

Estimated Annual Capital Additions

Estimated annual capital additions over the life of the resource are included in Figure 5 found in the above section titled "Estimated Annual Costs."

Decommissioning/Dismantlement Costs

Estimated decommissioning and dismantlement costs assumed for the BESS resource are **REDACTED**. This value represents an estimated cost at the end of the life of the BESS.

Cost of Dedicated Transmission and Distribution Facilities

All costs of dedicated transmission and distribution are included in Figure 6 found in the above section titled "Cost Expenditure Plan." There are no costs associated with transmission projects for the Wadley BESS since this project will utilize the existing interconnection at the NEER Wadley solar facility.

Cost Comparison of Similar Projects

A cost comparison of projects similar by type, design, and capacity is provided in "Attachment C – Wadley BESS Cost Comparison of Similar Projects **TRADE SECRET**."

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Activities and Critical Path Schedules

“Attachment D – Wadley BESS Preliminary Activities and Critical Path Schedule TRADE SECRET” details the activities and critical path schedule.

Lead Times for Major Procurement Items

See “Lead Time” section above for applicable information on lead times for major procurement items.

Other Information

The Company has no additional information to include at this time.

Cost Recovery

Georgia Power proposes to recover the costs associated with the construction of the Wadley BESS in rate base and will reflect the operating expenses associated with the units in its retail cost of service. Regulatory treatment for these units will be consistent with the current treatment of Georgia Power’s existing owned retail generation facilities. Georgia Power will be opting out of the ITC tax normalization for the Wadley BESS project, as necessary, to provide those benefits most favorably to customers.

Conclusion

This Application requests that the Commission approve the certification of the Supplemental Resources of five NEER BESS PPAs with existing solar PPA amendments, the Company-owned Wadley BESS project with associated existing solar PPA amendment, the Tenaska Heard County PPA, and the MPC PPA amendment.

As outlined and supported throughout this Application, the procurement of these resources is necessary and cost-effective to secure capacity resources to continue reliably serving the state's economic growth, beginning in the winter of 2027/2028. The Company leveraged RFP processes through the Winter 27_28 BESS RFP and the 2029-2031 All-Source RFP to competitively solicit capacity resources from the market through the winter of 2030/2031. However, remaining capacity needs of approximately 150-850 MW in this timeframe remain following the results of these RFPs. Based on these outstanding capacity needs, Georgia Power began investigating near-term capacity options that satisfy customer demand outside of an RFP process.

The Supplemental Resource portfolio provides Georgia Power and its customers a variety of benefits. Generation capacity represents one critical benefit that these dispatchable resources will provide. Georgia Power is also able to leverage existing infrastructure from existing market PPAs under contract with Georgia Power. These resources save time and avoid additional capital investment by utilizing locations that have transmission capacity available as early as the winter of 2027/2028 to provide the best value to Georgia Power customers. The BESS resources also provide several other benefits, including energy arbitrage capabilities to optimize energy savings by shifting the energy output, including solar energy, from periods of relatively low system marginal cost to hours with relatively high system marginal cost.

The request in this Application complies with applicable Commission rules and is in the public interest; therefore, the Company requests that the Commission (1) certify the NEER BESS PPAs and associated solar PPA amendments, the Wadley BESS project and associated solar PPA amendment, the Tenaska Heard County PPA, and the MPC PPA amendment through the RFP exceptions in Commission Rules 515-3-4-.04(3)(f)(3) and (6); (2) approve the total deemed certified amount of approximately **REDACTED** for the Wadley BESS project; and (3) approve the additional sum of \$3/kW-year associated with the capacity PPAs.

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Attachment A – Supplemental Resources Economic Analysis

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Attachment B – Wadley BESS Operational Data

PUBLIC DISCLOSURE

Attachment C – Wadley BESS Cost Comparison of Similar Projects

PUBLIC DISCLOSURE

Attachment D – Wadley BESS Preliminary Activities and Critical Path Schedule