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

Georgia Power Company

October 1, 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
October 1, 2025

Table of Contents

I. EXECUTIVE SUMMARY 4
Georgia Power's Environmental Compliance Strategy 6
II. PERMITTING 7
CCR Permitting 7
CCR Legacy Rule Implications 8
Other Permitting 10
III. PROJECT UPDATES 11
Activity Overview 11
Ash Pond Closure Progress 15
CCR Landfills 21
IV. BENEFICIAL USE 26
Beneficial Use of Production CCR 26
Research and Technology 26
Beneficial Use of Stored Ash at the Facility Level 27
V. SCHEDULE SUMMARY 29
Ash Pond Estimated Closure Construction Timeframes 30
Landfill Estimated Closure Construction Timeframes 31
VI. FINANCIAL SUMMARY 32
Georgia Power's CCR Asset Retirement Obligation 32
Near-Term Cash Flows 32
Long-Term Project Assumptions 33
Actual Versus Budget Summary 37
VII. APPENDIX A 39
Abbreviations and Terminology 39
VIII. APPENDIX B 40
Schedule Summary - CCR Unit Level 40
IX. APPENDIX C 55
Financial Summary - CCR Unit Level 55

Georgia Power Company
Coal Combustion Residuals Asset Retirement Obligation Program
Semi-Annual Program Status Report
October 1, 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, the Final Order in the 2022 IRP proceeding in Docket No. 44160, and the Order Adopting Stipulation in the 2025 IRP proceeding in Docket No. 56002, Georgia Power Company ("Georgia Power", "GPC", or the "Company") provides this semi-annual report under the designated Docket No. 43083, regarding the Asset Retirement Obligations ("ARO") for its Coal Combustion Residuals ("CCR") compliance strategy activities through July 31, 2025 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 March 2025 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 and the draft permit for McDonough AP-2/3/4 were received from EPD in March 2025.

In 2024, the Company began the permit renewal process that occurs every five years for final permits issued with EPD. Three permit renewals, McIntosh AP-1, Hammond AP-1, and Hammond AP-2, have been approved by EPD. An additional permit renewal for Hammond AP-4 was submitted and is currently under EPD review.

Regulatory Impacts – Legacy Rule: In July 2025, Environmental Protection Agency ("EPA") issued a direct final rule and companion proposed rule to the CCR Legacy Rule to allow both parts of the Facility Evaluation Report ("FER") to be prepared and submitted concurrently by February 8, 2027, extending the submittal date for the first round of FER work by one year. Additionally, EPA proposes extending the deadline for certain groundwater monitoring provisions by 15 months to no later than August 8, 2029. The direct final rule and

companion proposed rule are substantively the same but procedurally different. On September 3rd, EPA withdrew the direct final rule due to receiving adverse comments. The comment period for the companion proposed rule was extended to September 15th and EPA is currently reviewing those comments.

Regulatory Impacts – Effluent Limitations Guidelines ("ELG") Rule: In June 2025, EPA issued a press release stating they intend to extend certain compliance dates within the 2024 Supplemental ELG Rule, which may alter the existing deadlines for Zero Liquid Discharge ("ZLD") compliance. Specific dates have not been shared but EPA anticipates releasing a proposed rule with the final rule issued by the end of 2025.

Project Updates: Plant Wansley AP-1 recently commenced dewatering in June 2025, in accordance with their EPD-approved dewatering plan. Ash removal has been completed for Mitchell AP-2 and Hammond AP-1 as of the third quarter of 2025.

Beneficial Use: Notable updates include 1.7 million tons of ash have been removed from Plant Mitchell and Plant Bowen, Plant Bowen's ash production facility system enhancements are underway, construction delays to the Plant Branch beneficial use facility have occurred but operations still expect to begin in 2026, and the Company continues to focus on research and development activities including new research into extraction of critical minerals from coal ash.

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 $1.9 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 Environmental Compliance Strategy ("ECS") updates. Implementation progress is reported semi-annually in the CCR ARO Program Status Reports. The Company also posts compliance-related information on the Company's external website. The Company will notify the PSC within 30 days of any determination by EPD causing a change in closure strategy for ash ponds closing in place. 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**	**13**

[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 removed and released from its CCR permit on November 25, 2024.*

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 and the draft permit for McDonough AP-2/3/4 was received from EPD in March 2025.

Table 2: Final Permit Issuance through September 2025

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

*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.*

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.

In November 2024, EPD accepted the Decontamination Certification for Yates Gypsum Landfill and issued a release from its CCR Permit and associated post-closure groundwater monitoring and maintenance, which took effect immediately. The Company properly abandoned the groundwater monitoring wells that were part of the Gypsum Landfill's groundwater monitoring network and filed an abandonment report with EPD in the first quarter of 2025. This first of its kind milestone is a significant positive step, setting a precedent for future projects, and creating a clear path towards site closure.

Additionally in 2024, the Company began the permit renewal process that occurs every five years for final permits issued by EPD. Three permit renewals, McIntosh AP-1, Hammond AP-1, and Hammond AP-2, have been approved by EPD. An additional renewal for Hammond AP-4 was submitted and is currently under EPD review.

EPD permitting activities are expected to continue through the life of the closure projects and post closure care. The Company remains actively engaged with EPD to address their comments and requests for information.

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 SI 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. CCR 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 classify as a legacy unit. Although exempt from federal regulation until November 2024, Georgia Power's legacy units have all been regulated by Georgia EPD's regulatory programs. These units have been or are currently being closed in accordance with the CCR Rule requirements and are protective of human health and the environment. The finalization of the CCR Legacy Rule, however, subjects these legacy SIs 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 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 the installation of permanent identification markers follow this effective date as required by the CCR Legacy Rule. A copy of the associated Applicability Reports has been placed on Georgia Power's website.

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

	Legacy Surface Impoundments[1]	Applicability Notes
Arkwright	**2**	Arkwright AP-1 and AP-3 are classified as legacy surface impoundments. These units were previously closed as landfills and are identified as such by Georgia EPD.
Branch	**5**	All of the ash ponds at Branch are classified as legacy surface impoundments. A Closure Certification pursuant to 40 C.F.R. § 257.100(g) was provided with the Applicability Report for Branch AP-A, 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**	Mitchell AP-1 and AP-2 are classified as legacy surface impoundments.
TOTAL	**10**	

[1]Closure strategy has not changed for Legacy Surface Impoundments, all of which are closure by removal.

The CCR Legacy Rule also requires facility evaluations at all current and inactive electric utilities with a legacy SI to identify the existence of CCRMUs. The CCR Legacy Rule requires a comprehensive FER in two parts. Any CCRMUs that are identified through the facility evaluation process are required to close in accordance with CCR Legacy 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.

In July 2025, EPA issued a direct final rule and companion proposed rule to the CCR Legacy Rule that would allow a one year extension date to the submittal of the first round of FER work meaning both parts of the FER are to be prepared and submitted concurrently by February 8, 2027 and extend the deadline for certain groundwater monitoring provisions by 15 months to no later than August 8, 2029. The direct final rule and companion proposed rule are substantively the same but procedurally different. On September 3rd, EPA withdrew the direct final rule due to receiving adverse comments. The comment period for the companion proposed rule was extended to September 15th and EPA is currently reviewing those comments.

Other Permitting

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 and have purchased necessary mitigation credits for this permit. In 2023, the Company applied for an IP for the Huffaker Road landfill expansion near Plant Hammond with an updated IP submitted to the USACE in the second quarter of 2025. Mitigation credits and the permit issuance for both Plants Hammond and Arkwright is expected in 2026.

The Company has also been working with EPD to obtain two stream buffer variances to construct the expansion at the Plant Wansley landfill. One buffer variance was approved in 2024 with the second variance expected to be approved 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, a 10 MW solar installation was completed at Plant McIntosh. Additionally, Georgia Power has included options for future solar development in several CCR permits. A list of all planned or existing installations are listed in the table below.

Table 4: New Generation Activities Within Closed CCR Units

CCR Unit	New Generation
Hammond AP-3	Option for future solar development was included in the final CCR permit.
McIntosh AP-1	10 MW solar facility began commercial operations in 2024.
McDonough AP-3/4	Solar pilot project demonstration removed in third quarter of 2025. Option for future solar development is included in the CCR permit.
Yates AP-1	Three gas-fired generating units (Yates 8-10), currently under construction, are located partially in the footprint where ash has 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 measures, 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 July 2025, the Company is continuing dewatering operations at eight plants in accordance with EPD-approved dewatering plans: Plants Bowen, Branch, Hammond, McDonough, Mitchell, Scherer, Wansley and Yates. Plant Wansley recently commenced dewatering in June 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. Between January and July 2025, independent wastewater treatment contractors treated approximately 940 million gallons of water and independent sampling contractors conducted over 350 sampling events for the effluent and receiving streams. To date, over seven billion gallons of water have been treated and over 3,600 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 Post Closure Care ("PCC") period to manage ongoing water treatment requirements. This support will continue until the needs of the sites are addressed. In addition, the Company has engaged independent, third-party contractors for weekly effluent and bi-monthly receiving stream sampling throughout dewatering. Samples collected by independent contractors are analyzed by accredited independent laboratories.

The dewatering process is dynamic and complex, with treatment system demands impacted by site-specific rainfall and site-specific closure conditions. This may require

differing treatment technologies at each site, and ongoing fluctuations in labor resource needs, operation schedules, and costs as the dewatering process is adjusted to accommodate ongoing closure needs. The Company will adjust the individual site water treatment infrastructure to align with site needs and regulatory requirements during closure and post-closure as required.

ELG

In 2024, the EPA published the final Supplemental ELG Rule. The new ELG requirements will require the addition of treatment systems for leachate collection systems at CCR landfills and for legacy wastewater from ash pond closures. The treatment of CRL is dependent on the generation status of the facility:

- Active coal generation facilities past 2034: CRL cannot be discharged, meaning ZLD must be achieved by no later than December 31, 2029. This applies to the landfills at Plants Bowen and Scherer.
- Inactive coal operation facilities: CRL will require physical and chemical treatment to meet limits before discharge based on EPD's best professional judgment. Site specific compliance dates are to be prescribed in the NPDES permit.

The treatment of legacy wastewater, which is dewatering at all ash pond closures, will require similar treatment to the CRL requirements for inactive coal operation facilities based on EPD's best professional judgment.

In June 2025, EPA issued a press release stating they intend to extend certain compliance dates within the 2024 Supplemental ELG Rule, which may alter the existing deadlines for ZLD as mentioned above. Specific dates have not been shared but EPA anticipates releasing a proposed rule with the final rule issued by the end of 2025.

Groundwater

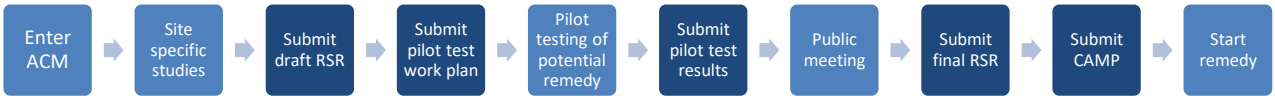
Georgia Power continues to monitor groundwater at its ash ponds and CCR landfills, report the results to EPD, and post regular updates to the Company's external website. Georgia Power has installed comprehensive groundwater monitoring networks, including more than 600 wells, at its facilities across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

As required under the CCR rules, the Company continues to perform routine sampling and reporting for the compliance parameters listed in the rules. Between January and July 2025, 40 additional groundwater wells and piezometers were installed and 26 wells were abandoned due to ongoing closure efforts, completion of temporary sampling during evaluation of corrective measures, and the release from the Yates Gypsum Landfill permit. More than 1,300 groundwater samples were collected from all the wells, and the

results were included in 49 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 the Company continues the ACM process, prior to implementing a corrective measure or remedy, the Company will conduct additional activities as illustrated in Figure 1 below. Draft remedy selection reports ("RSR") are 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 throughout the corrective action process.

Figure 1. Remedy Selection Process



Dark blue indicates approval by EPD needed prior to moving onto next step
CAMP = Corrective Action Monitoring Plan

Several sites are within the remedy selection process. Prior to implementing a remedy, there is an iterative process of review with EPD. The Company is actively working with EPD for approval of the Company's chosen remedy and implementation strategy. The table below shows a summary of the status of the CCR units that have entered into ACM.

Table 5: Remedy Selection Status

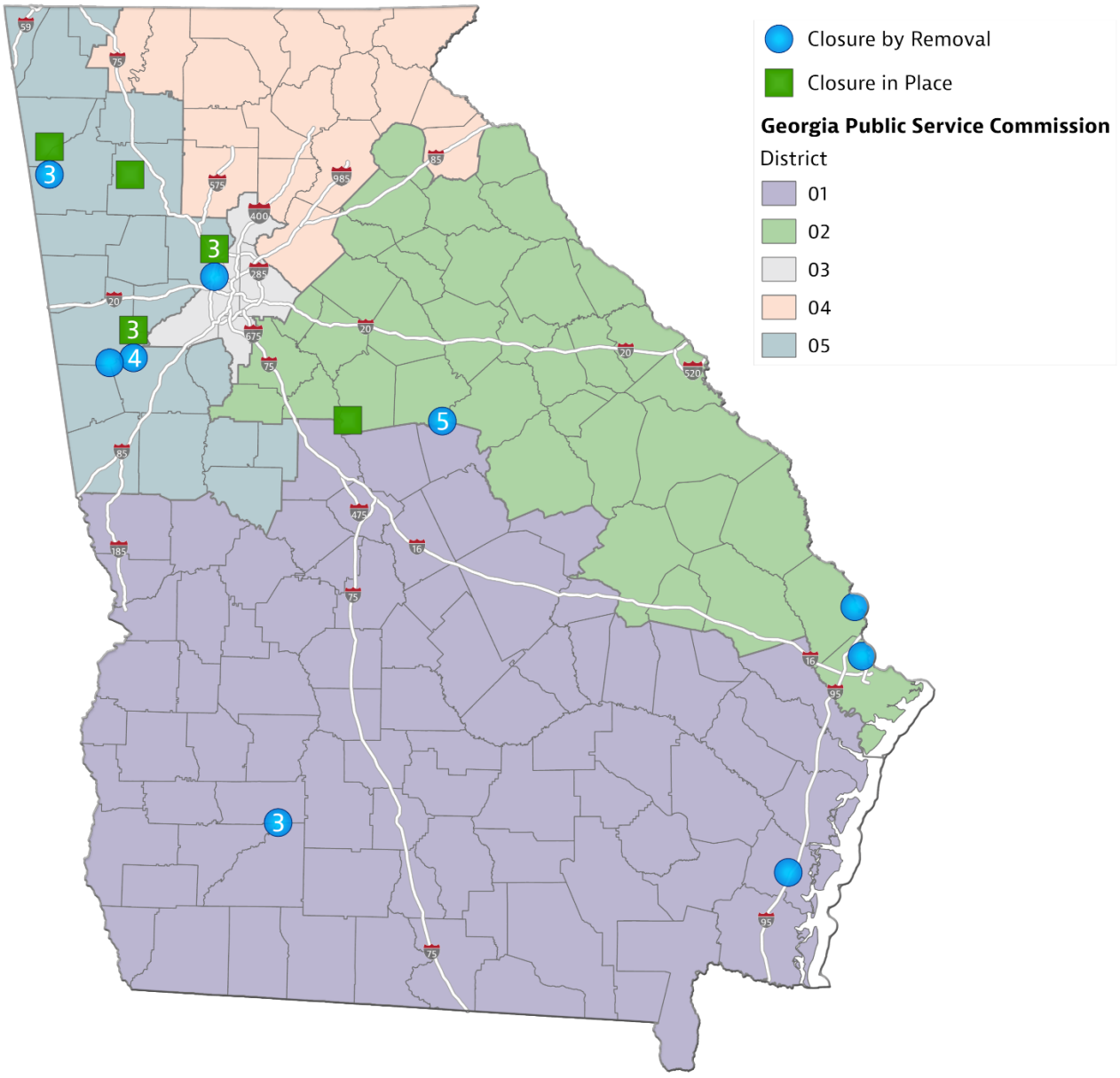
Site	Remedy Selection Status
Arkwright AP-2	Submitted draft RSR; under EPD review
Arkwright AP-3	Submitted draft RSR; under EPD review
Bowen AP-1	Pilot testing underway
Branch AP-B/C/D	Drafting pilot test workplan
Branch AP-E	Drafting pilot test workplan
Grumman Rd Landfill	Submitted draft RSR; under EPD review
Hammond AP-1	Pilot testing complete and results submitted to EPD
Hammond AP-2	Pilot testing complete and results submitted to EPD
McDonough AP-1	Drafting pilot test work plan

Site	Remedy Selection Status
McDonough AP-2, 3/4	Pilot testing underway
McIntosh AP-1	Conducting site specific studies and lab testing
McManus AP-1	Pilot testing complete and results submitted to EPD
Scherer AP-1	Conducting site specific studies
Wansley AP-1	Conducting site specific studies
Yates AMA/R6	Submitted draft RSR; under EPD review

Ash Pond Closure Progress

Georgia Power has 29 ash ponds at 11 sites.

Figure 2. Ash Pond Closure Locations



Construction Activities

The Company has continued making closure construction progress at its ash ponds across Georgia. Closure activities include dewatering, site preparation, ash excavation, ash consolidation/placement, installation of closure cover systems, installation of engineering measures, 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 6 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 inspections, 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 6: 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 submitted to 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 and site restoration are complete in accordance with the CCR permit. A certification of removal has been submitted to 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 completed with an impermeable, soil-geocomposite vegetated cover system. The final closure certification has been submitted to EPD. Consistent with the post-closure plan, an engineering measure consisting of a TreeWell® system was installed in 2024 outside and downgradient of the CCR footprint of AP-3. The system utilizes specialized planting units designed to promote downward root growth with the focus of groundwater extraction at a targeted depth.			
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 2016 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. CCR was removed in two phases and certifications of removals for both of those phases were submitted to and acknowledged by EPD. 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) consisting of cells. Since first quarter of 2024, the beneficial use facility has been in commercial operation. CCR meeting harvest requirements continues to be removed from the ash pond and hauled to the beneficial use facility for processing and commercial sales. A certification of partial removal and closure construction was submitted to EPD. Ash removal and follow-on liner construction for Cells 1a and 1b is complete, and CCR placement is in progress. Work is progressing for the closure by removal of Cell 3 and liner construction following CCR removal.			
Hammond AP-1	CBR	In Closure	Ongoing
Ash removal has been completed for the 35-acre ash pond and dewatering activities will continue until backfilling and site restoration are complete in accordance with the CCR permit. CCR was removed 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 has acknowledged the engineering plans for the barrier wall.			

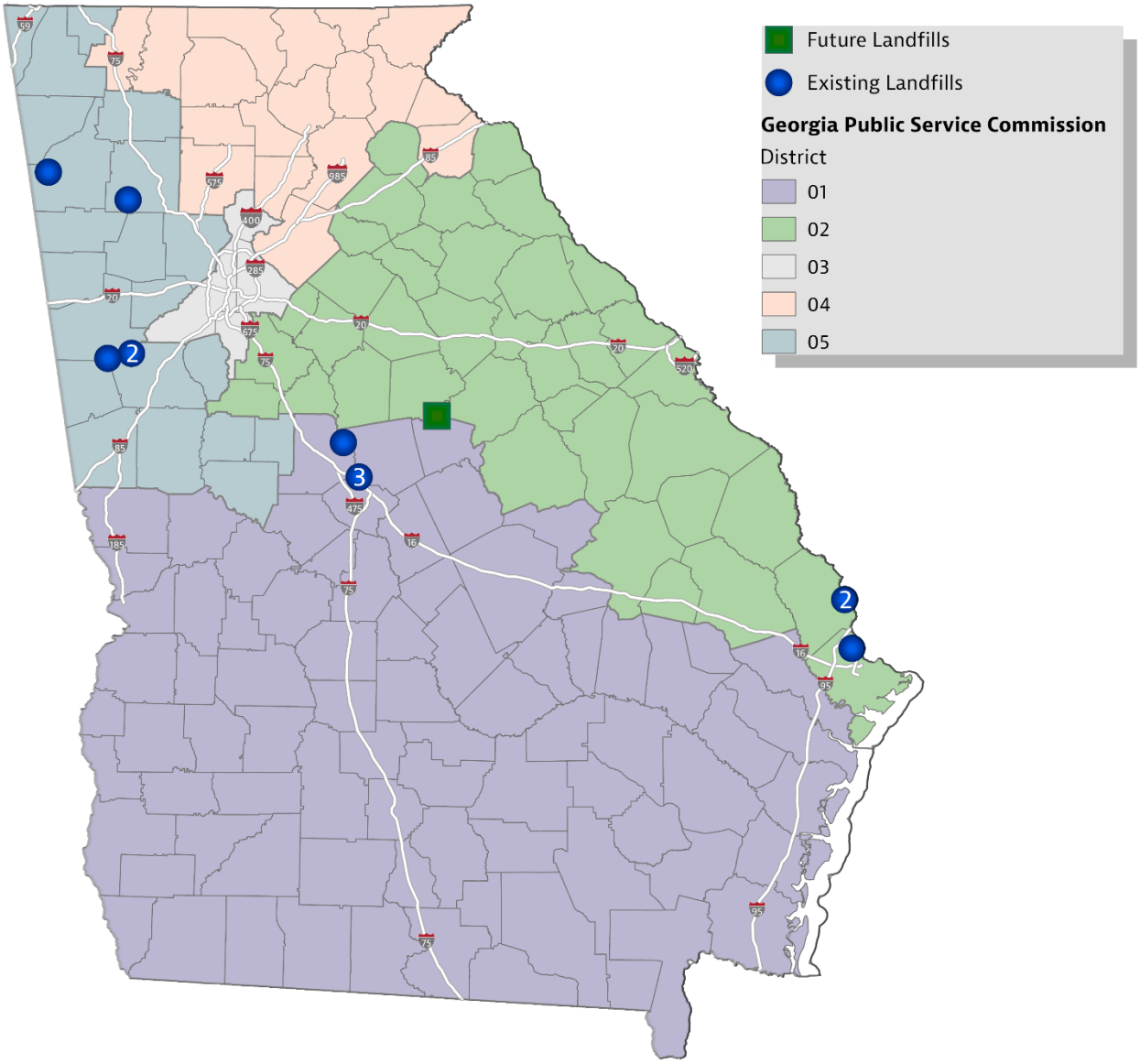
	Closure Strategy	Construction Status	Dewatering Status
McDonough AP-2, AP-3, AP-4	AP-2: CBR AP-3/4: CIP	In Closure	Ongoing
AP-2: CCR was removed from the 7-acre ash pond and consolidated into AP-1, AP-3, and AP-4. A certification of removal report has been submitted to and acknowledged by EPD. Site restoration 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 pumping wells as an engineering measure. Final closure activities are underway and expected to be complete in 2025.			
Mitchell AP-1, AP-2, AP-A	CBR	In Closure	Ongoing
CCR removal from the combined ash pond area of 104-acres is ongoing. CCR removal from AP-2 was completed in second quarter of 2025 and restoration activities are underway. 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
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
AP-A/AP-B: CCR was removed and consolidated into the AP-3/AP-B' footprint. Certification of removal reports have been submitted to and acknowledged by EPD. Site restoration is ongoing as well as an evaluation of the CCR remaining around transmission structures. **AP-3/AP-B':** Installation of a cap cover system, which includes a geomembrane, and will ultimately cover the consolidated AP-3/AP-B' 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.			

	Closure Strategy	Construction Status	Dewatering Status
Yates AP-C	CIP	In Closure	Completed
The former ash pond was previously incorporated into the on-site permitted CCR landfill, R6.			
Pre-Construction			
Branch AP-B, AP-C, AP-D	CBR	Pre-Construction	Ongoing
CCR will be removed and consolidated into a new on-site permitted landfill or processed through the on-site beneficial use facility. Construction of the on-site permitted landfill and beneficial use facility is ongoing, see Table 7 and Section IV 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.			
Branch AP-E	CBR	Pre-Construction	Ongoing
CCR will be removed and consolidated into the new on-site permitted landfill or processed through the on-site beneficial use facility. Construction of the on-site permitted landfill and beneficial use facility is ongoing, see Table 7 and Section IV for more details. Dewatering and early site preparation activities, such as establishing surface water drainage features and vegetation clearing, are underway on the 348-acre ash pond.			
Hammond AP-4	CBR	Pre-Construction	Ongoing
The Company is continuing to progress the closure design package. The 54-acre ash pond is planned to be closed by removal to the Company-owned off-site permitted CCR landfill, Huffaker Road, pending permitting and construction for the expansion of the landfill.			
Wansley AP-1	CBR	Pre-Construction	Ongoing
Early site preparation activities are ongoing on the 343-acre ash pond, and dewatering activities recently began in the second quarter of 2025. CCR removal to the onsite CCR landfill will begin once the landfill expansion permit is received from EPD and the construction is complete. More details on the landfill construction are in Table 7. Additionally, gypsum is being harvested for beneficial use which will continue into 2026 and a drainage feature to minimize surface water drainage into the ash pond is ongoing.			

CCR Landfills

Georgia Power has 13 CCR landfills with one CCR landfill under construction and one former CCR landfill removed from its permit.

Figure 3. CCR Landfill Locations



CCR Landfill Activities

The Company 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, the Company is in the process of constructing one future on-site CCR landfill at Plant Branch, to support closures, Consistent with the Georgia CCR Rule, five operational landfill permits, two closure permits, and one release from permit have been received to date.

Table 7: 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 through the Plant Branch beneficial use facility. Site restoration will be completed following CCR removal. Early sitework will begin in 2026 to improve access to the site and construct water management and water treatment features supporting closure.	
Bowen Landfill	Operational for Generation and Ash Pond Closure
Bowen landfill cells 1, 2, 3, 4, 9 and 10 remain active and support plant operations. Landfill cells 5 and 6 were constructed to support AP-1 closure and began receiving CCR in second quarter of 2025. The landfill will undergo final 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, which is still currently underway. Streambank mitigation credits were obtained in 2023 and 2024 to support the landfill expansion, and the Company expects to obtain remaining streambank mitigation credits by 2026. Landfill cells A and B supported the closure by removal of AP-1 and AP-2; closure construction (cap construction) of these cells will be completed in 2025.	
Kraft Grumman Road Landfill	IPCC
The cap cover system has been installed, and construction certification documents have been submitted to EPD. The Company is working with EPD to finalize permitting documents. 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. In 2023 and 2025, EPD approved two-year extension requests to initiate final closure of the landfill and to support the Company's ash pond closures.	
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 construction activities began in 2025.	

	Landfill Status
Wansley Landfill	Operational for Closure
The Company submitted a Site Acceptability Report to EPD in 2023 to initiate the landfill expansion permitting process. The Company is in the process of reconstructing all bottom liner components and replacing the 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 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 one request for a two-year extension and a second two-year extension was submitted in 2025 to extend the Site Limitations timeline 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 and expected to begin receiving CCR in 2027.	

IV. BENEFICIAL USE

Beneficial use is the recycling or reuse of CCR in lieu of disposal. Georgia Power's ECS (Docket No. 44160) describes the Company's beneficial use efforts focused on the following categories: beneficial use of production CCR inclusive of coal ash and gypsum, 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 ("ABUC") 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.

Critical minerals are natural resources that are essential to economic and national security and vital for renewable energy systems, electronics, and advanced technologies. Several critical minerals, including rare earth elements, are known to exist within coal ash. The U.S. Department of Energy ("DOE") has promoted the start of extraction and

processing critical minerals within the United States. Since third quarter of 2024, the Company has been engaged in a DOE study at Plant Branch to design and estimate costs for a commercial-scale processing system to extract rare earth elements. This study and detailed estimation is currently ongoing and expected to complete by the end of 2025. Simultaneously, Plant Gaston in Alabama is in the design phases of building a demonstration-scale facility to extract critical minerals from stored coal ash and process up to five tons of coal ash per day. This project is ongoing and plans to begin construction before the end of 2025 with operations beginning in 2027.

In addition to these efforts, the Company is preparing to launch a feasibility study in partnership with Brixx Technology to evaluate the production of aggregate and concrete masonry units (such as cinder blocks) from stored ash. These applications represent a promising expansion of beneficial use beyond the ready-mix concrete market, with the potential to create high-volume, durable construction products that meet or exceed existing specifications. Success in this area would provide another outlet for ash from pond closures, reduce the amount of material requiring landfill disposal, and help offset closure costs through the creation of marketable products.

Beneficial Use of Stored Ash at the Facility Level

The Company 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. Up to two million tons of ash are planned to be removed from the site to help create Portland cement, which is used to make concrete, during the ash pond closures. 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. As of August 2025, one million 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

Transportation of stored 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 July 2025, approximately 300,000 tons of ash have been processed and sold from the site.

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 beneficial use contractor has expanded the railyard at Plant Bowen, significantly increased the rail car fleet, as well as installed improvements at Bowen's rail loading facilities. The contractor has also made improvements to their railway infrastructure in 14 states to increase the market distribution of ash.

The Company will continue to work with the contractor to manage productivity and market capacity with both operational and stored ash. The Company and the contractor are utilizing applicable learnings from this facility for startup and optimization at the Plant Branch location.

Plant Branch

Construction of the beneficial use facility is currently underway. The facility is designed to dry, sort, and thermally process ash to meet quality standards of the ready-mix concrete market. The beneficial use facility will be processing ash from the onsite ash ponds and landfill, which will include ash trucked from Plant Arkwright. The facility was planned to begin operations in fall of 2025, but in May, steel being erected collapsed in an overnight storm, damaging critical equipment and halting construction of the facility. The Company is currently working to update the facility commissioning schedule based on construction delays but still anticipates operations 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.

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 8: 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 9: 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**	**2020[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. A second request was submitted to EPD in 2025.

[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. The Company's current cost estimate applicable to retail customers over the next approximately 60 years is $8.0 billion, which includes the approximately $1.9 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.

The cost estimate has not changed since the March 2025 Semi-Annual Report. The Company is currently reviewing all years in its CCR ARO forecast and expects to update its CCR ARO liability by year-end 2025. Table 10, Table 11, and Table 12 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 third quarter of 2025 have resulted in a retail cash flow forecast for the program for years 2024–2028 that is relatively consistent with the program's forecast included in the March 2025 Semi-Annual Report. As it relates to the timing of near-term cash flows, the Company has experienced and/or expects variability to its current near-term forecast primarily due the following factors:

- In line with strict compliance deadlines mandated by federal and state CCR rules, the Company must continue work on ash pond closures while permitting discussions between Georgia EPD and EPA are ongoing. Consistent with past practice, the Company plans and sequences work strategically to ensure closure progress continues as required “in the shortest amount of time consistent with recognized and generally accepted good engineering practices” (40 C.F.R. 257.102(d)(1)(v)), while also adjusting the schedule for certain activities to mitigate risk where possible.

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

Ash Ponds

Facility	Project to Date Actuals Through JUL 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032 and Beyond	Total
Bowen	**313.8**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Branch	**299.6**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Hammond	**167.7**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Kraft	**8.4**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
McDonough	**181.2**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
McIntosh	**23.3**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
McManus	**110.9**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Mitchell	**196.0**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Scherer	**33.3**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Wansley	**84.4**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Yates	**296.4**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**	**REDACTED**
Ash Pond Subtotal	**1,715.0**	**106.1**	**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 July 31, 2025*
***Forecasted escalation is applied based on ARO accounting standards under ASC 410.*
**** Negative August-December 2025 forecast is driven by YTD 2025 cash flow timing. The forecast will be updated for the full duration of the project in the March 2026 Semi-Annual Program Status Report.*
Note: Details may not add to totals due to rounding.

Table 11: Current Cost Estimates for CCR ARO Landfill Projects

Landfills

($ in Millions)

Facility	Project to Date Actuals Through JUL 2025	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032 and Beyond	Total
Arkwright	78.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Bowen	0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Branch	(0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Hammond	14.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Kraft	22.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
McIntosh	14.0	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	40.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill Subtotal	170.8	15.2	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 July 31, 2025*
***Forecasted escalation is applied based on ARO accounting standards under ASC 410.*
**** Negative August-December 2025 forecast is driven by YTD 2025 cash flow timing. The forecast will be updated for the full duration of the project in the March 2026 Semi-Annual Program Status Report.*
Note: Details may not add to totals due to rounding.

Table 12: Current Cost Estimates for CCR ARO Ash Pond Closure and Landfill Projects

($ in Millions)

Category	Project to Date Actuals Through JUL 2025	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032 and Beyond	Total
Ash Pond Subtotal	**1,715.0**	**106.1**	**288.1**	**245.8**	**222.3**	**1,107.3**	**2,296.5**	**5,981.1**
Landfill Subtotal	**170.8**	**15.2**	**46.2**	**55.3**	**66.7**	**361.5**	**1,267.0**	**1,982.7**
Total	**1,885.9**	**121.3**	**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 July 31, 2025.*

***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 13: July 2025 Year-to-Date Actual versus Budget Comparison

($ in Millions)

	January – July 2025 Actuals	January – July 2025 Budget*	January – July 2025 Variance
Arkwright	$ 5.6	REDACTED	REDACTED
Bowen	$ 18.8	REDACTED	REDACTED
Branch	$ 39.0	REDACTED	REDACTED
Hammond	$ 17.1	REDACTED	REDACTED
Kraft	$ 1.2	REDACTED	REDACTED
McDonough	$ 19.7	REDACTED	REDACTED
McIntosh	$ 1.3	REDACTED	REDACTED
McManus	$ 0.7	REDACTED	REDACTED
Mitchell	$ 26.5	REDACTED	REDACTED
Scherer	$ 5.5	REDACTED	REDACTED
Wansley	$ 27.2	REDACTED	REDACTED
Yates	$ 11.9	REDACTED	REDACTED
Total	**$ 174.4**	**$ 194.0**	**$ (19.6)**

Retail Cost Estimates

**Budget associated with the October 2024 compliance filing submitted to the PSC in Docket No. 44280.*

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

Table 13 summarizes July 2025 year-to-date actual costs for CCR ARO activities at all sites compared to the budget associated with the third quarter of 2024 rate setting filing for the same period. The variance to the forecast for the portfolio is primarily driven by the following:

- **Bowen:** Under-run due primarily to delays in landfill 5 and 6 construction, cell 1B structural fill work and liner install (structural fill is necessary along with liner/leachate collection installation in the ash pond closure plan); additionally, delayed ash movement in AP-1 due to schedule adjustment on landfill 5 and 6, cell 1B, and lower beneficial use ash production.

- **Branch:** Under-run due primarily to delays in landfill construction as a result of weather impacts. Additionally, CCR excavation at AP-D has not started due to a construction delay of the beneficial use facility. Lastly, the expanded water treatment system was released for procurement later than expected due to contract negotiations.

- **Hammond:** Underrun for the site is due primarily to increased ash quantities in AP-1 which delayed start of AP-1 backfill and restoration along with delayed

stacking and final cover at landfill cells A/B. Also contributing to the underrun is the delayed start of constructing landfill cell F due to longer permitting times and closure of landfill cell E.

- **McDonough:** Over-runs are primarily due to additional excavation and backfill scope, addition of modutank reconfiguration work and stormwater pond excavation works. These over-runs were partially offset by the under-runs due to shift in the AP-1 barrier wall construction schedule after EPD's acknowledgement of the barrier wall design.
- **McIntosh:** Under-run due primarily to the timing of corrective action.
- **Mitchell:** Over-run due primarily to contractual price escalation and additional excavation within AP-2.
- **Wansley:** Over-run due primarily to the 2024 design change in the landfill to fully replace the liner system. This became necessary following an engineering evaluation of the existing liner and future stacking plans to retrofit to support ash pond closure.
- **Yates:** Over-run due primarily to additional activities including sump pump operations, installation of toe drain, wrinkle repair for liner, the demolition of former support building and surge pond, water management, and continued completion of restoration activities.

VII. APPENDIX A

Abbreviations and Terminology

ABUC	**Ash Beneficial Use Center**
ACM	**Assessment of Corrective Measures**
AMA	**Ash Management Area**
AP	**Ash Pond**
ARO	**Asset Retirement Obligation**
ASC	**Accounting Standards Codification**
CAMP	**Corrective Action Monitoring Plan**
CBR	**Closure By Removal**
CCR	**Coal Combustion Residual**
CCRMU	**Coal Combustion Residual Management Unit**
CIP	**Closure In Place**
CRL	**Combustion Residual Leachate**
DOE	**Department of Energy**
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**
FER	**Facility Evaluation Report**
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**
RSR	**Remedy Selection Report**
USACE	**United States Army Corps of Engineers**
ZLD	**Zero Liquid Discharge**

VIII. APPENDIX B

Schedule Summary - CCR Unit Level

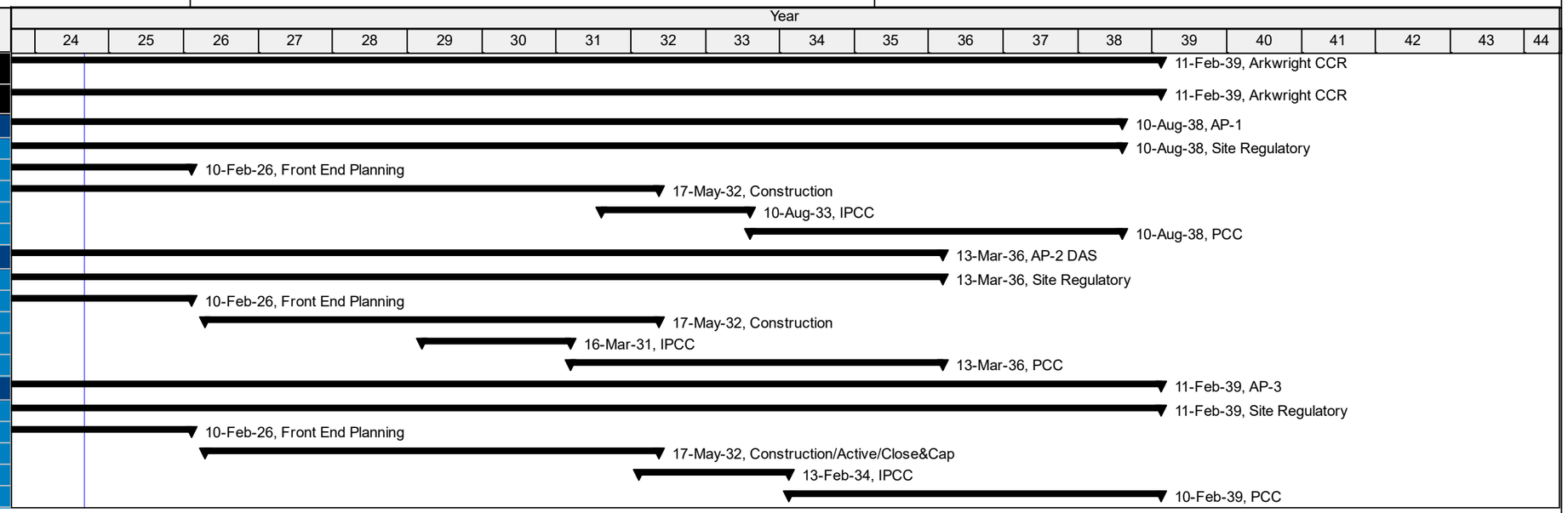
The following Gantt charts include schedule summaries for each site, with activities for each ash pond and CCR landfill grouped into the categories listed below:

- 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.

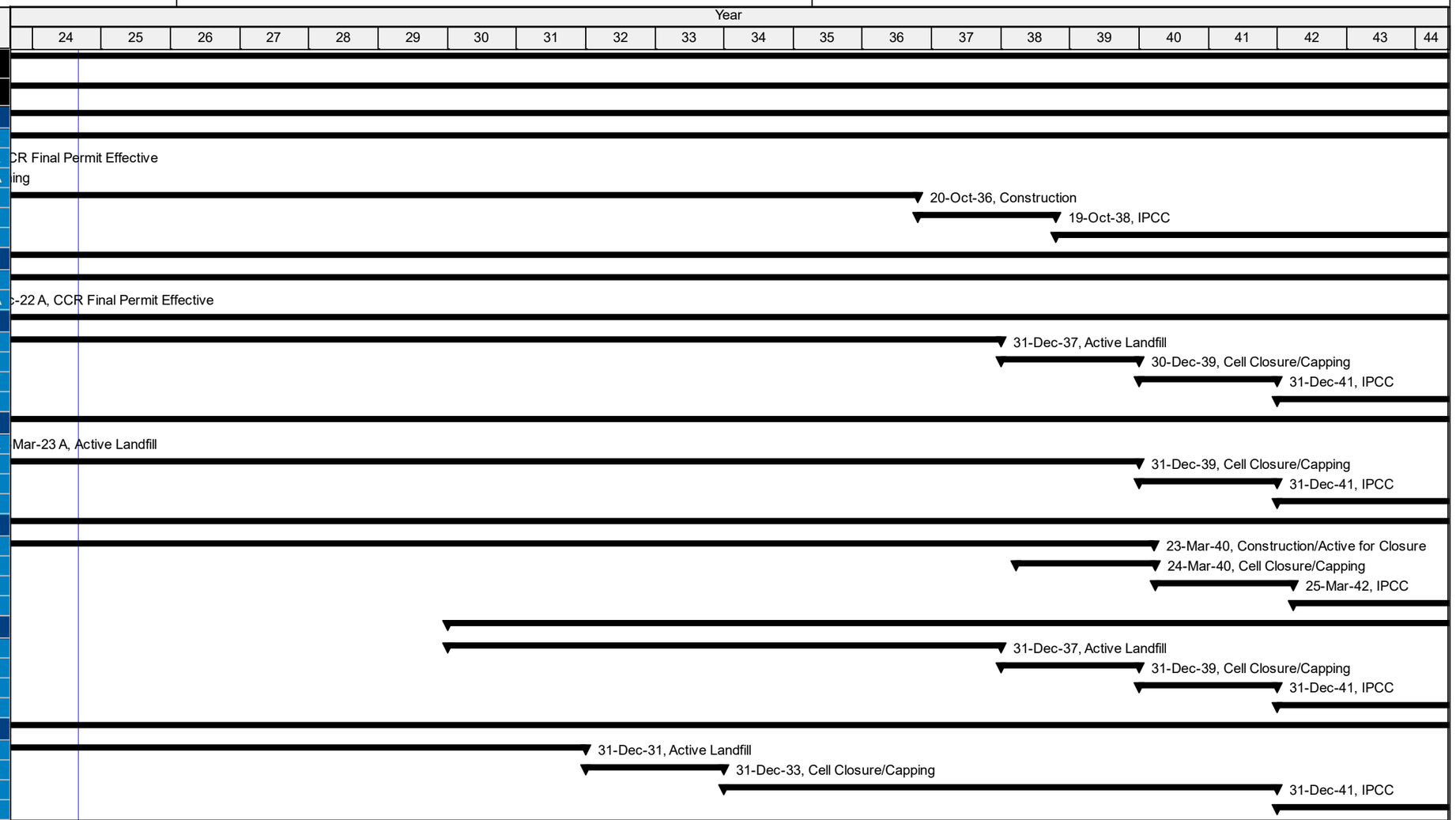
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



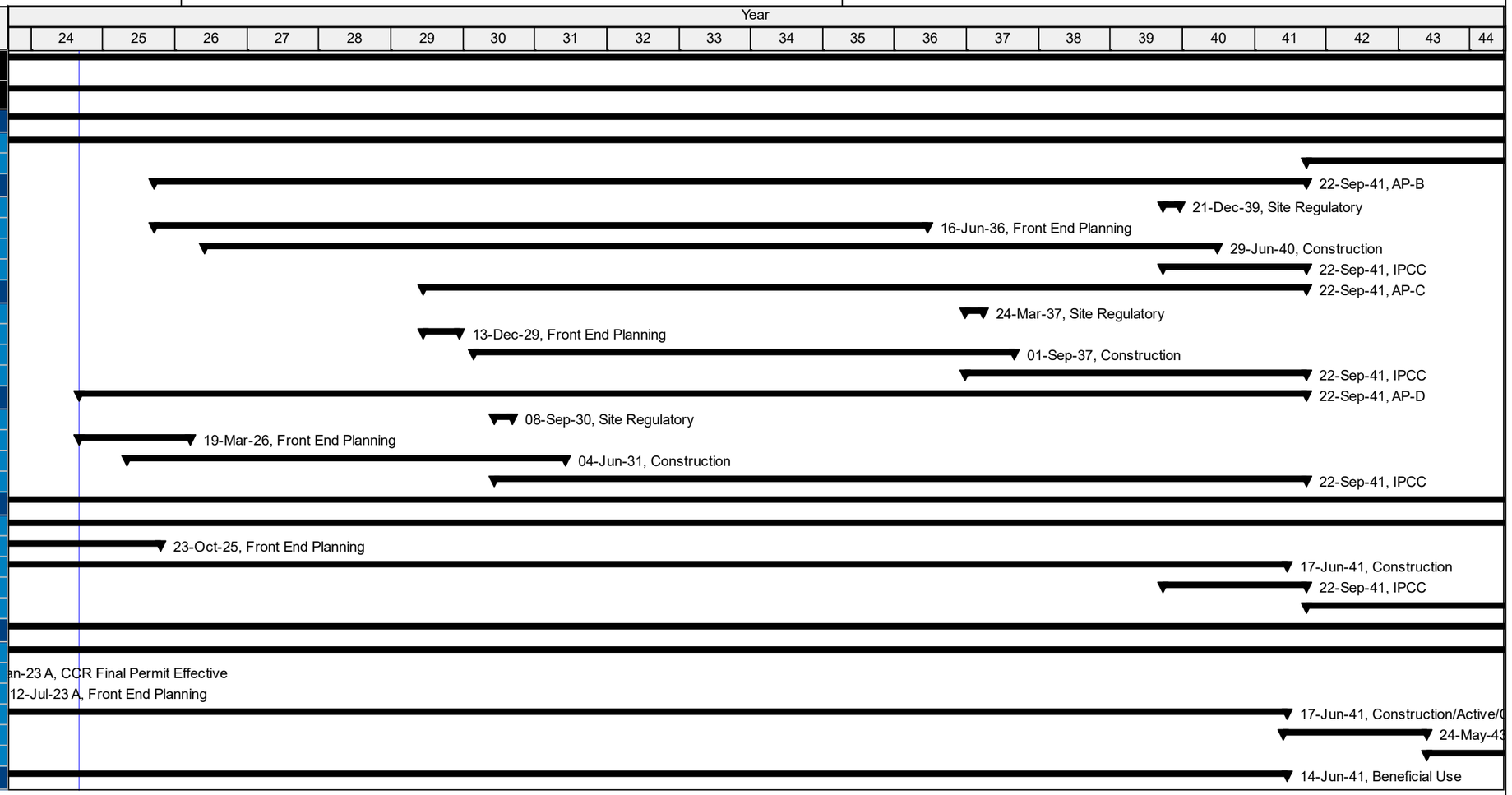
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



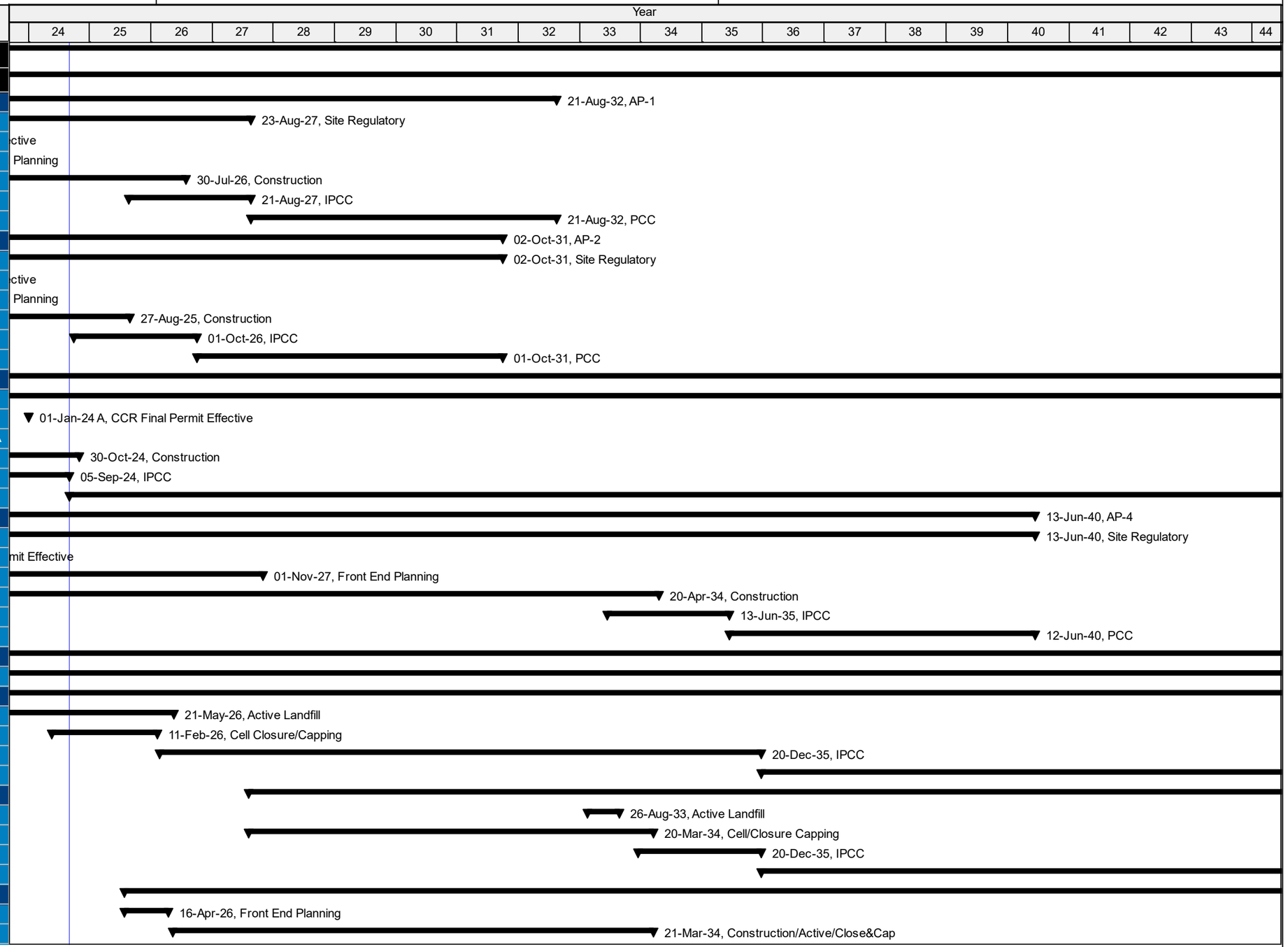
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



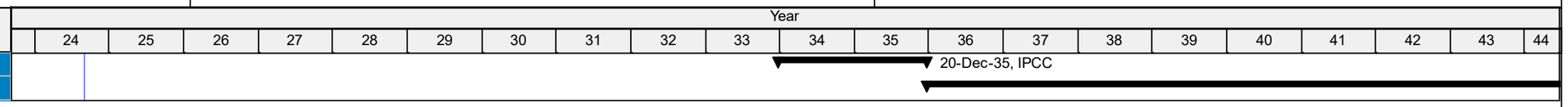
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



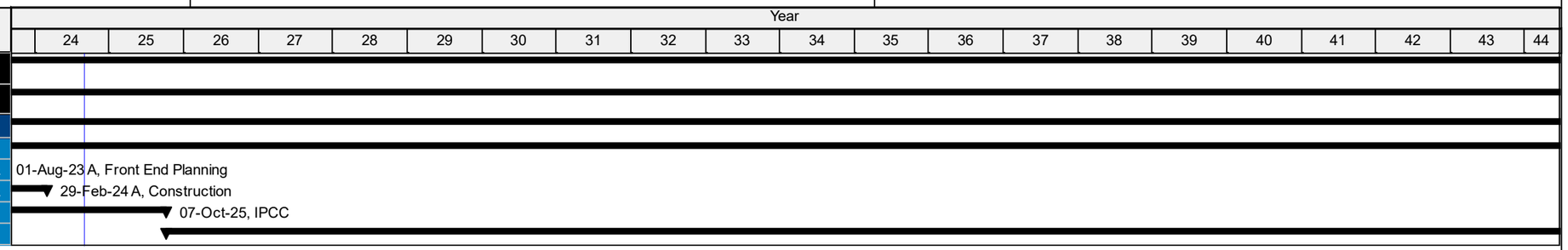
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



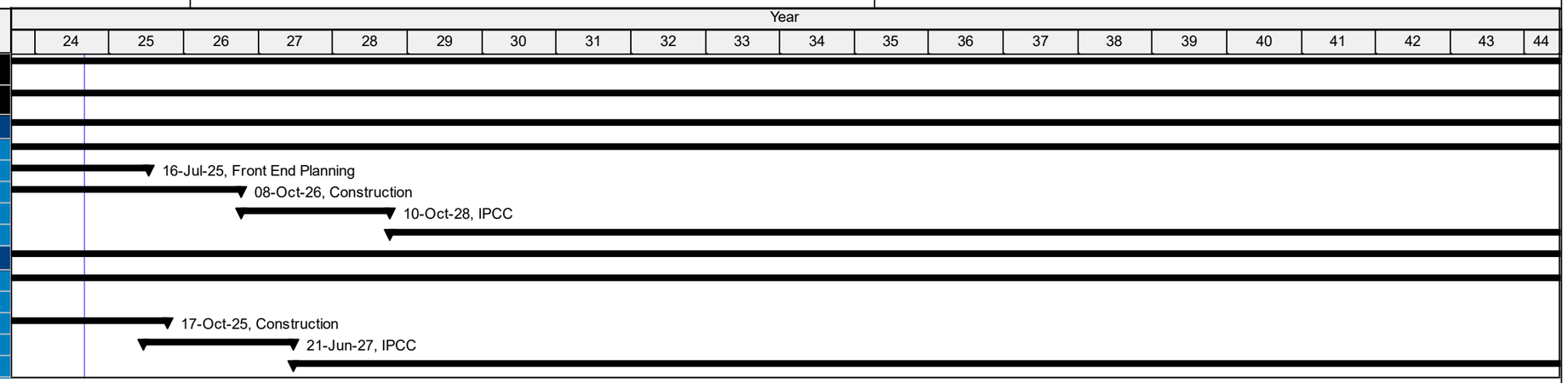
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



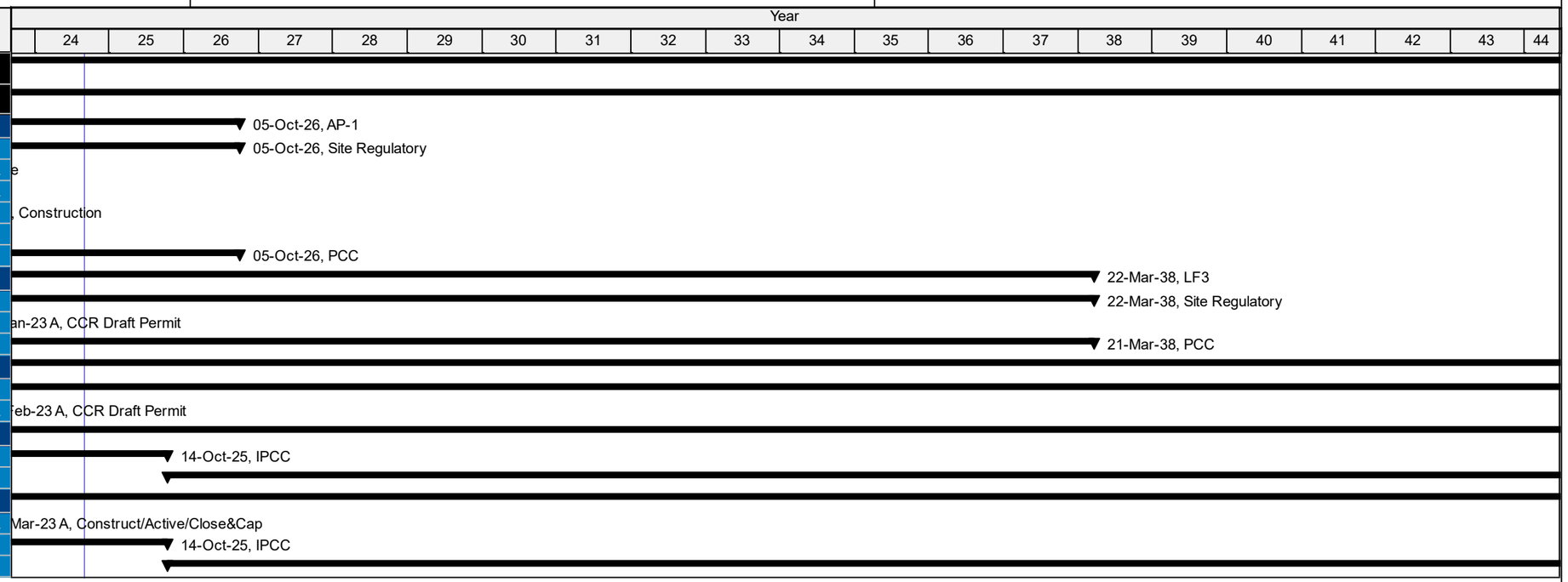
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



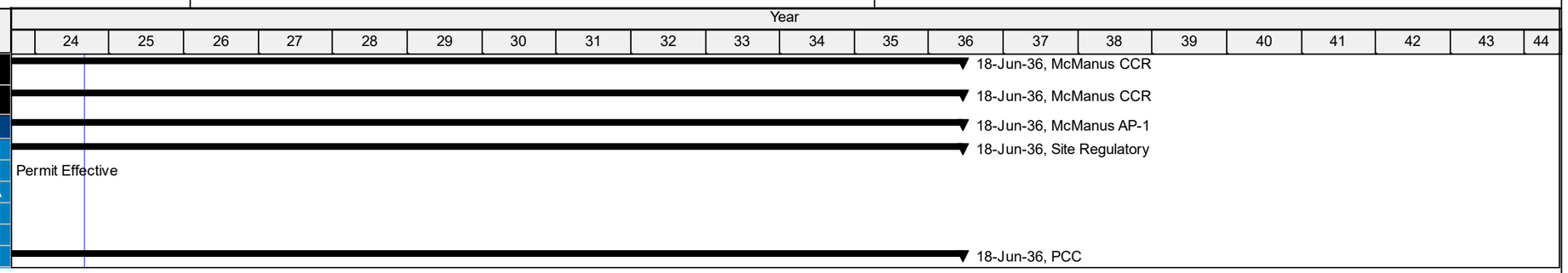
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



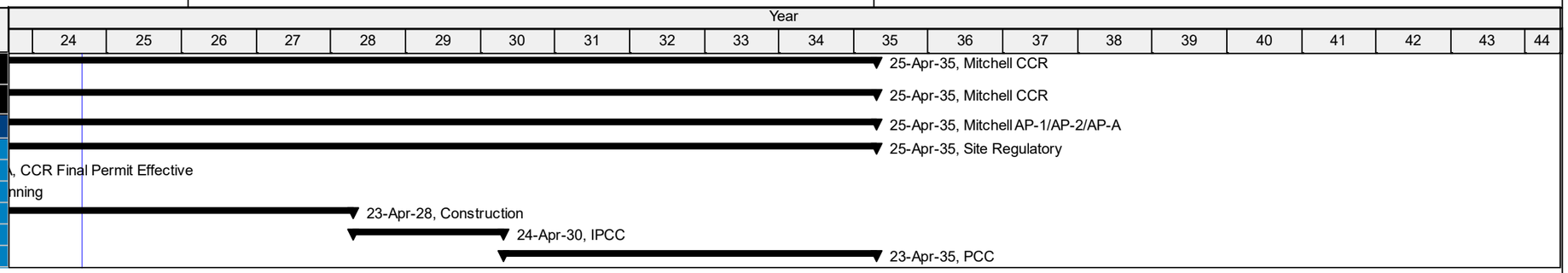
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



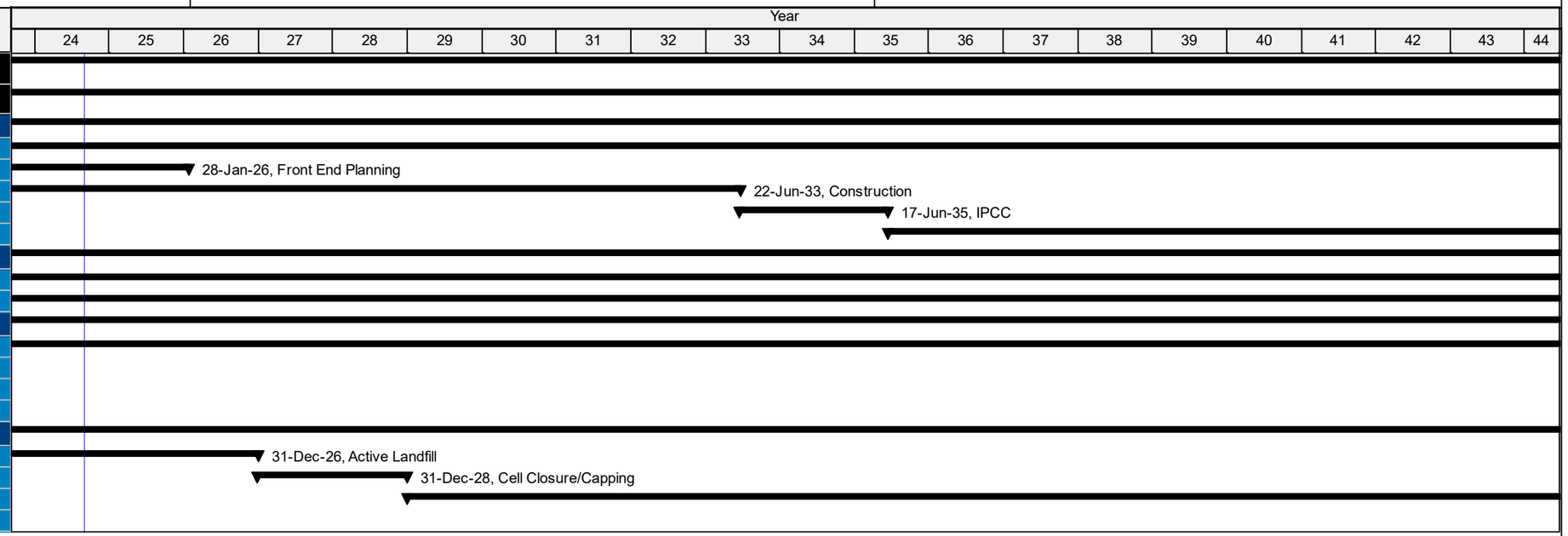
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



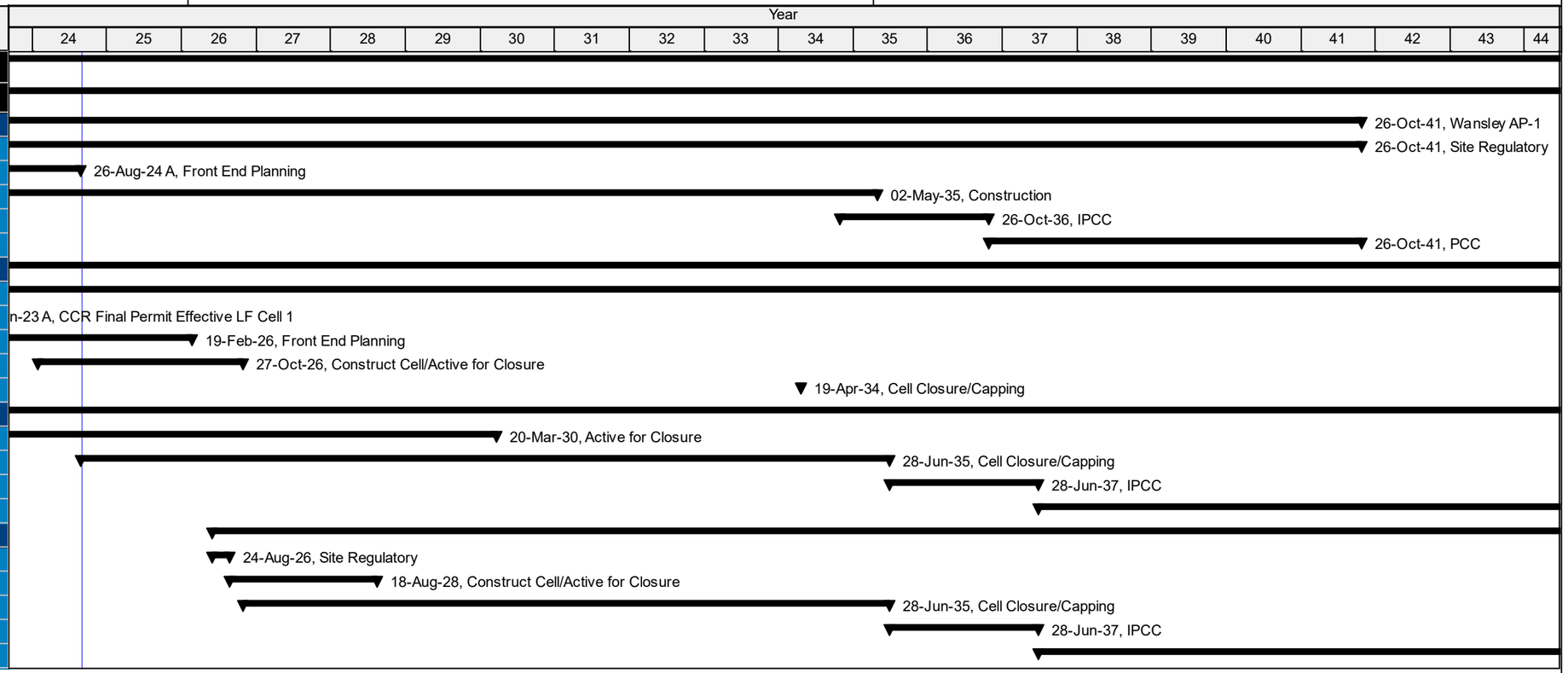
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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



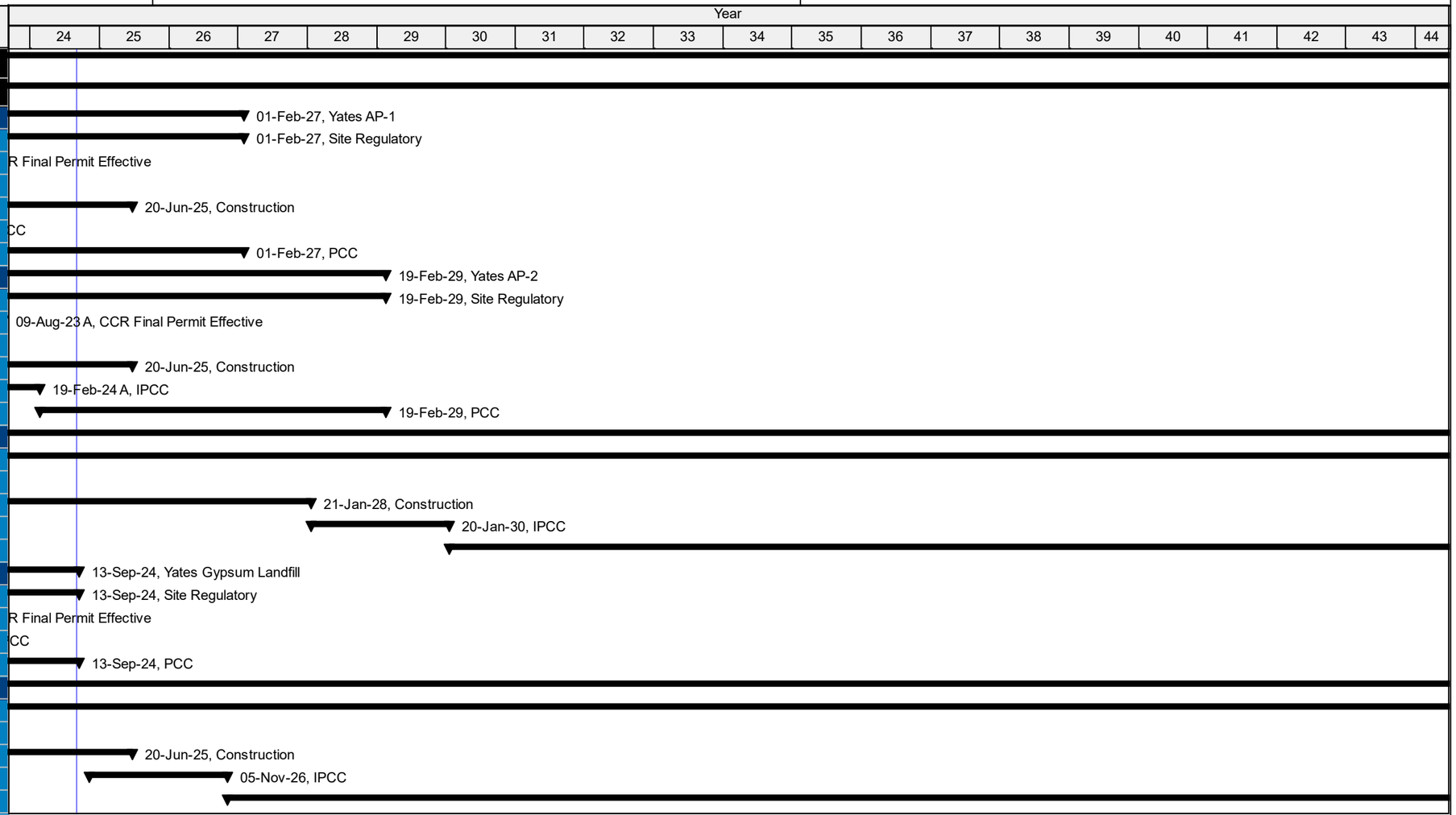
Ash Pond Closure Portfolio - 1Q25
Gantt Chart by Plant

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 July 31, 2025 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 2029 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 measures, site restoration, and landfill development to support ash pond closures. Construction activities also include construction-indirect costs such as temporary facilities, project and construction management, quality assurance, quality control, and temporary facilities.
- **Post-Closure Costs**: The time period after principal construction during which requirements to conduct monitoring, manage water, and conduct maintenance exist. This category represents both the actual and/or estimated IPCC and PCC costs for the site. This category encompasses both post-closure for a closure-in-place project and post-construction (or post-removal) for a closure-by-removal project.

Arkwright

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 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	$ 78.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 78.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Table 12. Arkwright Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ 12.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 20.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 13.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 7.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 25.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ -	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 78.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $5.6 million consist primarily of engineering design, leachate transport, stability monitoring costs, and groundwater monitoring.

Bowen

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Advanced closure in place with liner	$ 313.8	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		$ 313.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Table 14. Bowen Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ 25.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 23.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 29.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 15.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 220.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ -	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 313.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $18.8 million consist primarily of AP-1, beneficial use and landfill cells 5/6 ash movement, including landfill liner work, water management and dewatering infrastructure for AP-1, and structural fill work.

Branch

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 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	$ 31.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-C	Closure by removal to permitted landfill	$ 39.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-D	Closure by removal to permitted landfill	$ 25.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-E	Closure by removal to permitted landfill	$ 202.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ -	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 299.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31,2025*

Note: Details may not add to totals due to rounding

Table 16. Branch Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 27.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 10.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 17.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 243.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 0.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 299.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31,2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $39 million consist primarily of on-going water management and dewatering, construction of AP-B equalization pond, landfill construction, and beneficial use facility construction.

Hammond

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 43.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill	$ 54.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 29.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Closure by removal to permitted landfill	$ 40.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Huffaker Road CCB Facility	Closure in place	$ 14.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 182.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31,2025*

Note: Details may not add to totals due to rounding

Table 18. Hammond Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ 10.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 25.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 6.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 7.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 130.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 3.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 182.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31,2025*

Note: Details may not add to totals due to rounding. Negative August-December 2025 forecast is driven by YTD 2025 cash flow timing. The forecast will be updated for the full duration of the project in the March 2026 Semi-Annual Program Status Report.

Notes

2025 actuals through July of $17.1 million consist primarily of continued AP-1 ash excavation, AP-2 backfill, landfill cell F site preparation, land purchase for access to landfill cell F and front end planning 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 July 2025*	August-December 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	$ 22.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 31.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Table 20. Kraft Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 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
Program Management	$ 1.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 0.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 0.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 17.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 10.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 31.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $1.2 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 July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Advanced closure in place	$ 36.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 18.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 64.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-4	Advanced closure in place	$ 62.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 181.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Table 22. McDonough Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ 2.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 26.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 1.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 7.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 144.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 181.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding. Negative August-December 2025 forecast is driven by YTD 2025 cash flow timing. The forecast will be updated for the full duration of the project in the March 2026 Semi-Annual Program Status Report.

Notes

2025 actuals through July of $19.7 million consist primarily of AP-3/4 water treatment operations and modutank reconfiguration, roadwork excavation, and certification support.

McIntosh

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 23.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 3	Closure in place	$ 3.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill 4	Closure in place	$ 10.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 37.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31,2025*

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 July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ 0.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 3.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 0.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 0.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 20.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 11.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 37.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $1.3 million consist primarily of ash pond/landfill dike and dam maintenance, continued groundwater monitoring and associated oversight, and program management.

McManus

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal to permitted landfill	$ 110.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 110.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Table 26. McManus Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ 0.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 3.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 0.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 0.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 91.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 14.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 110.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $0.7 million consist primarily of groundwater monitoring, pond dike maintenance, and associated oversight. A site security project is also projected for the end of the year.

Mitchell

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 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	$ 3.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-1	Closure by removal to permitted landfill and beneficial reuse	$ 89.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal to permitted landfill and beneficial reuse	$ 103.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 196.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

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 July 2025*	August-December 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
Program Management	$ 14.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 7.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 5.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 168.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 196.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $26.5 million consist primarily of the completion of AP-2 CCR movement. Additionally, actuals include the continuing 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 July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Advanced closure in place	$ 33.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Active landfill / closure in place	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 33.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Table 30. Scherer Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 4.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 2.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 2.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 24.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 33.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding. Negative August-December 2025 forecast is driven by YTD 2025 cash flow timing. The forecast will be updated for the full duration of the project in the March 2026 Semi-Annual Program Status Report.

Notes

2025 actuals through July of $5.5 million consist primarily of water treatment, and ash movement.

Wansley

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal	$ 84.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Landfill	Closure in place	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total		$ 84.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Table 32. Wansley Current Estimated Cost by Executive Cost Code

($ in Millions)

	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ (0.0)	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 15.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 12.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 4.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 52.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 84.4	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $27.2 million consist primarily of clearing and grubbing, stream relocation and culvert installation, importing aggregate, water treatment operations, stability monitoring instrumentation, landfill cell sand and rock removal. Gypsum beneficial use sales slightly offset cost through the period.

Yates

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

($ in Millions)

Ash Pond / Landfill	Closure Method	Project to Date Actuals Through July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
AP-1	Closure by removal	$ 17.5	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-2	Closure by removal	$ 123.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-3	Advanced closure in place	$ 102.2	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-A	Closure by removal	$ 17.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B	Closure by removal	$ 18.9	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
AP-B'	Advanced closure in place	$ 17.0	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	$ 36.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
		$ 337.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

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 July 2025*	August-December 2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029-2031 Forecast	2032-2078 Forecast	Total
Previous Closure Cost	$ 0.0	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Program Management	$ 17.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Front End Planning	$ 3.6	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Detailed Engineering Costs	$ 8.7	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Construction	$ 303.8	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Post Closure Costs	$ 3.3	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total	$ 337.1	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Retail Cost Estimates

**Project-to-Date Actuals represent costs incurred from January 1, 2003 through July 31, 2025*

Note: Details may not add to totals due to rounding

Notes

2025 actuals through July of $11.9 million consist primarily of activities within the AMA permit boundary that include; sump pump operations, installation of toe drain, and wrinkle repair for liner. Additional activities also include the demolition of former support building and surge pond, water management and continued completion of restoration activities.