Troutman Pepper Locke LLP
Bank of America Plaza, 600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308

troutman.com

troutman pepper locke

Allison W. Pryor
allison.pryor@troutman.com

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Jason Shaw, Chairman
Fitz Johnson, Vice-Chairman
Tim Echols, Commissioner
Lauren "Bubba" McDonald, Commissioner
Tricia Pridemore, Commissioner
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-5701

Re: Update and Proposed Revisions to BESS Requirements for Georgia Power RFPs; Docket No. 45084

Dear Commissioners,

On September 24, 2024, the Georgia Public Service Commission ("Commission") approved Georgia Power Company's ("Georgia Power" or the "Company") compliance filing to implement the Commission's August 21, 2024 Order Granting Southern Environmental Law Center's Motion for Reconsideration in Docket No. 45084. The Company's compliance filing included revisions to the pro forma Battery Energy Storage System ("BESS") contracts used in the CARES 2023 Utility Scale Request for Proposals ("RFP"), 2029-2031 All-Source RFP, and Winter 2027_2028 BESS RFP.

More specifically, the approved revisions made the contract counterparty responsible for all damages caused by a terrorist act, cyber security incident, or mechanical failure that results from any programmable electronic component of a Battery Management System, BESS Controller, or Site Controller sourced from the Netherlands. This change was implemented in the three RFPs mentioned previously and would be incorporated in all RFPs that include BESS resources going forward. However, based on Georgia Power's current understanding of the threat environment, the Company proposes to remove all references to the Netherlands from RFP Documents in all RFPs that include BESS Resources.

Georgia Power and Southern Company have established cybersecurity standards for generation facilities that specify the requirements for network architecture, physical access, electronic access, remote access, backups, system administration/updates, change management, transient cyber assets, and removable media. These protections are critical to securing Georgia Power's electric grid. While Southern Company and Georgia Power do not support the hosting of Georgia Power data in the Netherlands, the threat and concern related to data hosting does not extend to

software developed in the Netherlands, human talent working in the Netherlands, or hardware products built in/produced by the Netherlands. Because the restrictions currently in place address equipment rather than data hosting concerns, Georgia Power recommends removing all references to the Netherlands in Georgia Power RFPs.

Best wishes,

By Allison W. Pryor
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