Standards of Conduct
for Georgia Power Company's
CARES 2023 Request for Proposals

1. **Definitions.** These Standards of Conduct ("**Standards**") use the following defined terms:
   - **2022 IRP**: GPC's 2022 Integrated Resource Plan approved by the Commission in July 2022, which adopted an integrated resource plan identifying supply-side resource blocks to be added by GPC over specific periods in time.
   - **Acknowledgement**: The forms of Standards Acknowledgement to be executed by the Evaluation Team and COP Team that are attached to these Standards as **Exhibit A-1** and **A-2** and are incorporated by this reference. Each Evaluation Team member must execute the Acknowledgement at **Exhibit A-1**, and each COP Team member must execute the Acknowledgement at **Exhibit A-2**. All Acknowledgements must be provided to the IE.
   - **APA**: An asset purchase agreement to be executed between GPC and any winning Bidder(s) of the CARES 2023 RFP.
   - **APA/PPA Execution Date**: The date on which either an APA or a PPA, as applicable, between GPC and the winning Bidder(s) is executed pursuant to the RFP Process.
   - **Bid:** A written offer submitted in response to the 2023 CARES RFP to supply utility scale renewable energy resources pursuant to a PPA or APA.
   - **Bid Team**: If applicable, collective reference to employees or representatives of any GPC affiliate that intends to submit, or that submitted, a Bid in response to the 2023 CARES RFP.
   - **Bidder**: Any entity or individual submitting or potentially submitting a Bid in response to the 2023 CARES RFP.
   - **CARES Program**: The Clean and Renewable Energy Subscription program as set out in the Commission's orders in Docket No. 44160.
   - **CARES 2023 RFP**: The Clean and Renewable Energy Subscription Program (CARES) 2023 Request for Proposals, which is expected to be issued to the marketplace by GPC on the date approved by the Commission and which identifies the utility scale renewable energy resources to be procured, as set out in the 2022 IRP, as amended, if applicable.
   - **Commission**: The Georgia Public Service Commission.
   - **Company-Owned Proposal (COP)**: A GPC proposal to provide some or all of the utility scale renewable energy resources sought by the 2023 CARES RFP.
   - **COP Team**: Employees or representatives of GPC or SCS who are involved in the development and submission of a COP in the 2023 CARES RFP.
   - **Evaluation Team**: Employees or representatives of GPC or SCS who are involved in preparing the CARES 2023 RFP, evaluating submissions in response to the CARES 2023 RFP, or otherwise acting for or on behalf of GPC regarding any aspect of the preparation or conduct of the RFP Process, including those listed as serving on the primary evaluation team.
   - **GPC**: Georgia Power Company, the utility issuing the 2023 CARES RFP.

- **Independent Evaluator** or **IE**: Accion Group, LLC, who reports to the Commission and is under contract with GPC to oversee the RFP Process and who serves as the point of contact for all Bidders and COP Team members for RFP Process purposes, or any successor entity filling that role selected pursuant to the RFP Rule.
- **PPA**: The power purchase agreement between GPC and the winning Bidder(s) (or other entity identified as PPA counterparty as permitted under the CARES 2023 RFP.
- **PPA or APA Execution Date**: The date on which a PPA or APA, between GPC and the winning Bidder(s) is executed pursuant to the RFP Process.
- **RFP Conclusion**: Execution of all final PPAs or APAs awarded under the 2023 CARES RFP or termination of the 2023 CARES RFP, whichever occurs first.
- **RFP Process**: Preparation and issuance of the 2023 CARES RFP and all associated activities, which are expected to terminate upon the execution of one or more PPAs or APAs, as applicable, between GPC and the winning Bidder(s), and in which the IE will participate as contemplated by the RFP Rule.
- **RFP Rule**: Commission Rule 515-3-4-.04(3), as amended from time to time, if applicable.
- **RFP Service Date**: The date the Evaluation Team list is initially filed with the Commission.
- **SCS**: Southern Company Services, Inc., an affiliate of GPC that performs services as agent for GPC.
- **Specialized Technical Support Personnel**: Employees or representatives of GPC or SCS who have specialized knowledge or job responsibilities used: (i) to develop a specific aspect of the 2023 CARES RFP or a COP; or (ii) to perform a specific function in support of the RFP Process.

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

3. Evaluation Team and Bid Team or COP Team Communication (if Applicable). There will be no communication, either direct or indirect, between any Evaluation Team member, any COP Team member, and any Bid Team member from the RFP Service Date through the RFP Conclusion regarding the 2023 CARES RFP, any RFP document, or any aspect of the RFP Process, except: (i) necessary communications as may be made through the IE; and (ii) if applicable, discussion between the Evaluation Team and any Bid Team to conform a final PPA or APA, as applicable, if the Bid Team submits a winning Bid(s). For avoidance of doubt, no COP Team member may be a member of the Bid Team or communicate with the Bid Team during the RFP Process about any aspect of the RFP Process.

4. Communication with Bidders. After the RFP Service Date, no member of the Evaluation Team may have direct or indirect contact or communication with a Bidder pertaining to the 2023 CARES RFP, any RFP document, or any aspect of the RFP Process, except through the IE as further described in the RFP

Rule, until the time a Bid advances as a winning Bid and conforming of the final PPA or APA, as applicable, have begun with the Bidder, or the RFP Conclusion.

5. Information Sharing Prohibited. At no time following the RFP Service Date may an Evaluation Team member share any non-public information regarding the RFP Process with any Bidder or the COP Team, unless the precise same information is shared with all Bidders and the COP Team in the same manner and at the same time. If any Bidder or the COP Team attempts to directly contact a member of the Evaluation Team regarding the 2023 CARES RFP, any RFP document, or any aspect of the RFP Process, the Evaluation Team member must direct the person to the IE for all information and must report the communication to the IE.

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

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

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

9. COP Team Acknowledgement. On or before the RFP Service Date, as a condition to serving on the COP Team, each COP Team member must execute the Acknowledgement, agreeing to abide by these Standards. If any new member is added to the COP Team following the RFP Service Date, the new member must execute the Acknowledgement at **Exhibit A-2**: (i) agreeing to abide by these Standards; and (ii) affirming that the member has not engaged in any communication on or after the RFP Service Date that

would have violated these Standards if the new member had been a COP Team member as of the RFP Service Date. GPC, in coordination with the COP Team, will file an initial COP Team list with the Commission on the RFP Service Date and, if applicable, will file updated list(s) and provide Acknowledgement(s) from new COP Team member(s) to the IE periodically during the RFP Process.

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

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

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

EXHIBIT A-1

Standards of Conduct End of Process Acknowledgement

(Evaluation Team)

I, _____, hereby acknowledge:

1. I was employed by Southern Company Services, Inc. while I assisted Georgia Power Company with its CARES 2023 Request for Proposals as an Evaluation Team member, as defined in the Standards of Conduct for Georgia Power Company's CARES 2023 Request for Proposals ("**Standards of Conduct**").

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

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

Signed: _____

Dated: _____