Georgia Power

Bin 10230
241 Ralph McGill Boulevard, NE
Atlanta, GA 30308-3374

March 31, 2026

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-5701

Re: Georgia Power Company's Environmental Compliance Strategy 2026 Update; Docket No. 56002

Dear Ms. Tanner:

Enclosed for filing in compliance with the Georgia Public Service Commission's ("PSC" or the "Commission") Final Order in the 2025 Integrated Resource Plan ("IRP") proceeding in Docket No. 56002, is Georgia Power Company's ("Georgia Power", "GPC", or the "Company") Environmental Compliance Strategy 2026 Update ("Report").

This filing is being made in accordance with the Commission's Alternative Electronic Filing Procedures issued on March 17, 2020. If you have any questions, please call Hiren Patel at 404-506-6929.

Sincerely,

/s/ Jeremiah Haswell
Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company

Enclosures

Environmental Compliance Strategy

2026

Georgia Power Company

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 outside 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, 2025 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; legal proceedings and regulatory approvals and actions related to past, ongoing, and proposed construction projects, including Georgia Public Service Commission approvals and Federal Energy Regulatory Commission and Nuclear Regulatory Commission actions; 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, including the pace and extent of development of low- to no-carbon energy and battery energy storage technologies; state and federal rate regulations and the impact of pending and future rate cases and negotiations, including rate actions relating to additional generating capacity and transmission facilities, extension of retirement dates for fossil fuel plants, and fuel and other cost recovery mechanisms; catastrophic events such as fires, including wildfires, land movement, earthquakes, explosions, floods, high winds, tornadoes, hurricanes and other storms, solar flares, droughts, future pandemic health events, wars, political unrest, 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.

2026 Environmental Compliance Strategy Executive Summary

Georgia Power Company's ("Georgia Power," "GPC," or the "Company") 2026 Environmental Compliance Strategy ("ECS") continues its comprehensive annual process to review, refine, and update the 10-year outlook for environmental controls. The strategy's primary goals remain: ensuring compliance with evolving regulations and delivering cost-effective solutions while always prioritizing the affordability interests of our customers. Georgia Power's ECS is built on a foundation of flexibility, risk management, and stakeholder engagement. The Company continues to:

- Engage with state and federal agencies, including United States Environmental Protection Agency ("EPA"), Georgia Environmental Protection Division ("EPD"), and Georgia Public Service Commission ("GPSC" or "PSC")
- Invest in Research and Development ("R&D") and technology demonstrations to optimize compliance options
- Sequence compliance activities to minimize customer impacts and maintain system reliability
- Monitor regulatory developments

2025 marked a pivotal year in environmental policy, with the EPA proposing amendments to several major power sector rules, including:

- Supplemental Effluent Limitations Guidelines ("ELG")
- Disposal of Coal Combustion Residuals ("CCR") From Electric Utilities; Legacy Surface Impoundments ("Legacy Rule")
- Clean Air Act Section 111 Greenhouse Gas ("GHG") Rules
- Mercury and Air Toxics Standards Residual Risk and Technology Rule ("MATS RTR")

Legal challenges to these rules remain ongoing, but all are currently in effect. Georgia Power's compliance strategy is designed to be flexible and adaptive, enabling the Company to respond to regulatory changes and legal outcomes as they arise.

Supplemental ELG Rule Compliance Strategy

EPA's Supplemental ELG Rule finalized in May 2024 represents the third major revision to the ELGs in less than 10 years. The 2024 ELG Rule litigation remains on hold—on February 20, 2026, the Eighth Circuit granted EPA's request to continue to keep the case in abeyance while further rulemakings proceed. On October 2, 2025, EPA published the Proposed Deadline Extensions Rule proposing to extend compliance deadlines. On December 31, 2025, EPA published the Final rule which goes into effect March 2, 2026 with the following key provisions:

- Notice Of Planned Participation ("NOPP") Filing Deadline: Extended 6 years, from December 31, 2025 to December 31, 2031.
- Zero Liquid Discharge ("ZLD") Compliance: Latest deadline extended 5 years, from December 31, 2029 to December 31, 2034.

- Transfer Provisions: Facilities can switch between ZLD requirements and the 2034 Permanent Cessation of Coal Combustion ("PCCC") subcategory until December 31, 2034.
- Site-Specific Extensions: Permitting authorities may set alternative dates for Flue Gas Desulfurization ("FGD") Wastewater, Bottom Ash Transport Water ("BATW"), and Combustion Residual Leachate ("CRL") compliance due to unexpected/uncontrollable circumstances (e.g., supply chain issues).
    - Allows NOPP filings after December 31, 2025 related to the 2028 PCCC subcategory and transfers between subcategories.
    - Requires request letter and progress reports within 60 days of event or final rule publication.

The Supplemental ELG Rule's new ZLD requirements for FGD Wastewater and CRL are being addressed through capital investments and technology evaluations at Plants Bowen and Scherer. The company will continue to monitor updates to comply with applicable rules and regulations.

Legacy Rule Compliance Strategy

Georgia Power has implemented a comprehensive strategy to comply with both the Federal CCR Rule and the Georgia CCR Rule, ensuring safe closure of CCR units while minimizing customer impact and protecting the environment and public health. EPA finalized the Legacy Rule in 2024 (effective November 8, 2024) and litigation of the rule is currently in abeyance in the D.C. Circuit. The Legacy Rule extends certain requirements from existing Federal CCR regulations to two newly regulated categories of CCR units: legacy CCR surface impoundments and CCR management units ("CCRMUs"). Additionally, EPA created new definitions in the Legacy Rule related to closure performance standards. The Legacy Rule is expected to have limited impact on Georgia Power's CCR closure program because the EPD currently regulates existing legacy CCR surface impoundments and CCR Landfills under their CCR Solid Waste Management Program. The finalization of the Legacy Rule, however, expands federal oversight and imposes duplicative requirements for these units. We are addressing new requirements to existing legacy CCR surface impoundments and continue to evaluate the presence or absence of CCRMUs through the facility evaluation process, which is expected to continue through 2028. The Company will continue to engage with the EPD to ensure our closure plans and comprehensive permits are protective of human health and the environment.

111 GHG Rules Compliance Strategy

EPA's 111 GHG Rules have far-reaching implications for both new natural gas combined cycle units ("NGCC") and existing coal units, especially for utility resource planning in a time of significant projected load growth. Litigation of the rules is currently held in abeyance in the D.C. Circuit. In 2025, EPA proposed repealing all or portions of these rules, citing both technical and economic concerns and minimal climate impact from fossil fuel-fired power plants. Under the current rule, new NGCC units would be limited to a 40% capacity factor unless 90% carbon capture and storage ("CCS") is operational by 2032. CCS remains impractical for Georgia due to infrastructure and geologic constraints, making capacity factor limits the only viable compliance pathway for new gas units. For existing coal units, the preferred compliance pathway is natural gas co-firing, with engineering studies underway to enable implementation. Retirement or CCS options are not currently feasible given projected load growth and technical barriers. The proposed repeal is expected to either

eliminate all carbon emissions standards for coal and gas units or eliminate all requirements except efficiency-based standards for new NGCCs and combustion turbines. A final rule is anticipated in early 2026. Georgia Power continues scenario planning and adjusting compliance strategies amid uncertainty, balancing reliability and affordability with evolving federal mandates. The Company will provide the first 111 GHG semi-annual report in March of 2026, which provides a progress and cost update to the Commission.

MATS RTR Compliance Strategy

The MATS RTR is the least complex of the power sector rules finalized in 2024. The rule revision set a more stringent particulate matter ("PM") limit for coal units and removes compliance demonstration options to perform periodic stack testing of emissions that existed under the original MATS rule. With these changes, the rule only allowed one method of PM compliance demonstration: – PM continuous emissions monitoring systems ("PM CEMS"), which was also a compliance option under the original MATS rule. Even though Plant Bowen and Plant Scherer are already equipped to meet the more stringent PM limit, the Company applied for and received a Presidential Exemption which extended the compliance date to July 2029 due to the technical challenges with the required monitoring method. In June 2025, a repeal proposal was published with a final rule issued on February 24, 2026. With the repeal of the MATS RTR, there has been no update or change to how the Company has or will continue to control emissions under the MATS rule.

In conclusion, Georgia Power's ECS seeks to achieve the goals of cost effective short- and long-term decision-making, maintaining flexibility to adjust to new regulations and other new information, and ultimately implementing affordable solutions in the best interest of customers. The Company has carefully considered the risks of future changes in environmental requirements and other key factors in making compliance plans. The 2026 ECS includes, among others, plans to ensure compliance with the collective suite of ELG, CCR, 111 GHG, and MATS rules for the benefit of customers and reliability of our system. The projected capital expenditures for environmental compliance from 2026 through 2030 total approximately $379 million and Georgia Power's current cost estimate applicable to retail customers for the CCR Asset Retirement Obligation ("ARO") program over the coming decades is approximately $8.5 billion, including approximately $2.0 billion in actual costs previously incurred. The Company remains committed to transparency, providing the CCR semi-annual report, which provides a progress and cost update, to the Commission.

Table of Contents

1.0 INTRODUCTION **2**

1.1 STRATEGY PROCESS 3

1.2 STRATEGY ASSUMPTIONS 4

2.0 REGULATORY AND STRATEGY UPDATES **7**

2.1 WATER REGULATORY AND STRATEGY UPDATES 7

2.1.1 Waters of the United States (33 CFR 328 and 40 CFR 120) *9*

2.1.2 Cooling Water Intake Structures (40 CFR 122 and 125) *10*

2.1.3 Steam Electric Effluent Limitations Guidelines (40 CFR 423) *10*

2.2 COAL COMBUSTION RESIDUALS REGULATORY AND STRATEGY UPDATES 16

2.2.1 Federal CCR Rule Revisions (40 CFR 257) *17*

2.3 AIR REGULATORY AND STRATEGY UPDATES 32

2.3.1 National Ambient Air Quality Standards and Georgia Regulations *33*

2.3.2 SO_2 and NO_x Emissions Allowance Programs *37*

2.3.3 Maximum Achievable Control Technology Regulations *39*

2.3.4 Regional Haze Regulations (40 CFR 51.308) *43*

2.3.5 New Source Review and Other Air Permitting Regulations *45*

2.3.6 Greenhouse Gas Emissions and Climate Policy *47*

3.0 FINANCIAL SUMMARY **53**

ECS – APPENDIX A – MONITORED REGULATIONS **54**

ECS – APPENDIX B – ACRONYMS/ABBREVIATIONS **59**

ECS – APPENDIX C – R&D AND ENVIRONMENTAL CONTROL ALTERNATIVES **64**

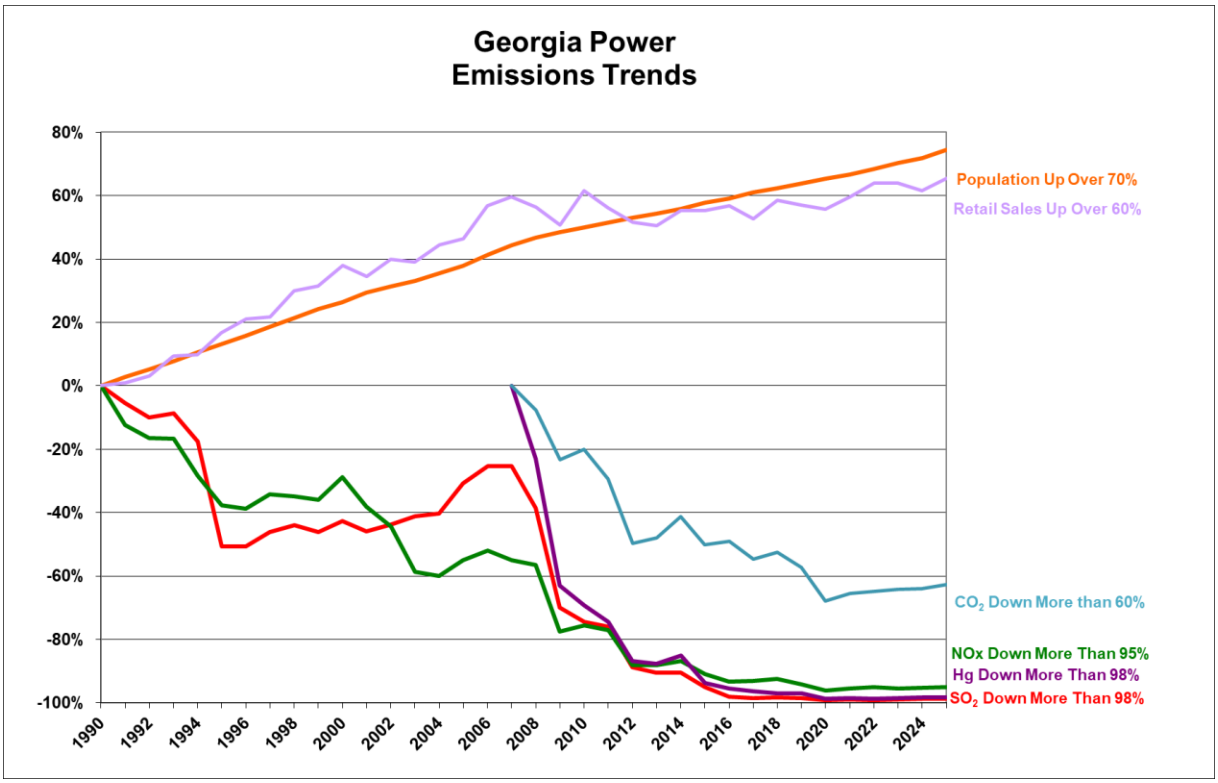
ECS – APPENDIX D – ENVIRONMENTAL CONTROL ALTERNATIVES INDEX **68**

ECS – APPENDIX E – HIGH-LEVEL AND LOW-LEVEL RADIOACTIVE WASTE STORAGE **75**

1.0 Introduction

Georgia Power is committed to meeting its environmental compliance obligations while also providing customers with clean, safe, reliable, and affordable energy. The Company has reduced nitrogen oxides ("NO_x") and sulfur dioxide ("SO_2") emissions from its generating fleet by more than 95% and 99%, respectively, since 1990, while mercury emissions have decreased by more than 98% and carbon dioxide ("CO_2") emissions by more than 60% since 2007. Further, water withdrawals have decreased by 90% since 2003 with the transition of the generation fleet, and operational efficiencies. Wastewater discharge requirements and ash pond closures have resulted in the installation of 16 wastewater treatment systems and dry or zero discharge ash handling equipment for coal facilities. The Company has also marketed, for beneficial use, over a five-year average, more than 85% of the CCR generated from plant operations, significantly reducing waste streams for the benefit of customers and the environment. In addition, 2.9M tons of CCR has been harvested for beneficial use from ash ponds and landfills over the last five years.

Figure 11. Georgia Power Emissions Trends



The Company's ECS seeks to continually optimize compliance plans in an increasingly dynamic regulatory environment. The comprehensive annual strategy development process considers existing and potential legislative and regulatory requirements and determines plant-specific compliance options. These options are evaluated based on available technology, cost, schedule, and impact to plant operations, the environment, and surrounding communities. This iterative approach is designed to provide the Company with the necessary flexibility to develop and refine

compliance plans to maintain and operate a diverse generation mix to serve customers in the most affordable manner.

As provided in GPSC Rule 515-3-4-.04(1)(c), the Company's ECS includes a detailed overview of current and proposed environmental regulations, existing environmental law, and potential legislation applicable to electric generating plants, as well as a comprehensive and cost-effective strategy for compliance. Georgia Power's ECS process is designed to adapt to changing regulations and assure compliance with robust control plans that are in the best interests of customers.

1.1 Strategy Process

The process for developing the ECS includes the comprehensive involvement of a number of organizations within the Company. In general, this integrated process includes four steps as discussed below.

1. **Anticipating and integrating the outcome of new environmental requirements**. The first step involves gathering all available knowledge about current and potential future local, state, regional, and federal environmental requirements, whether through legislation, rulemaking, permitting, or other processes. Some rules may mandate specific requirements on specific plants or assets, and others may require participation in an allowance-based cap and trade program over a regional or national scale. For many rules, the possibility that litigation will result in further changes creates additional uncertainty.
2. **Developing assumptions on federal and state levels.** In order to anticipate the impacts of federal and state environmental requirements on generating plants, the Company engages in a robust integrated resource planning process. This process evaluates the economic and reliability impacts of numerous generating resource decisions across a range of scenarios. The scenarios include a range of assumptions that appropriately consider future regulatory and market uncertainty and risk.
3. **Applying generating unit-specific control technology options.** The application of control technology requirements in the process is performed on a unit-by-unit basis. In some cases, the plant or unit's environmental control requirements are mandated, such as a plant-specific limit to meet the National Pollutant Discharge Elimination System ("NPDES") permit requirements. In other cases, such as the cap-and-trade program for SO_2 established to address acid rain, utilities can choose the most cost-effective of multiple options, such as fuel switching, applying a control technology, or purchasing emission allowances. As discussed in Appendix C, R&D continues to be an integral part of the overall Georgia Power environmental strategy and compliance plan. Through research, development, and demonstration, technologies are evaluated and selected for possible implementation to meet compliance with applicable environmental requirements. Technology-related decisions are made based on compliance alternatives, technical review (often following actual testing), schedules, equipment vendor price quotes, total costs over the useful life, specific unit issues, and performance guarantees. The process reviews the cost, control effectiveness, regulatory timing requirements, system reliability impacts, and operational considerations of the

applicable options in developing a unit-specific decision on the application of environmental control technologies.

4. **Determining and evaluating the financial requirements of the strategy.** The final step is to determine the cost and financial impact of the ECS. If environmental controls are mandated for a specific unit, then both the economic and system reliability value of the generating asset's continued operation must be considered in the Company's integrated resource planning process along with the cost of the control technology. The Company makes, at a minimum, triennial filings with the GPSC seeking approval of its Integrated Resource Plan ("IRP"), which includes economic evaluations of generating plants that consider load growth, compliance costs, and other economic pressures.

One major goal of the ECS process is to maintain flexibility in compliance options and operations across the generating fleet. A key advantage of this process is that it allows decision-making on an incremental basis. While the strategy includes environmental control plans for the next ten years, final decisions on specific projects are not made until the Company has sufficient information to complete the necessary technical and economic analyses. This process is a balanced approach to providing cost-effective solutions to environmental regulations on behalf of customers.

The uncertainty surrounding the legislative and regulatory environment reinforces the need for a flexible, robust compliance strategy. Accordingly, the Company's ECS balances the need to make decisions on certain timelines, considering factors such as the lead time required for fuel and equipment purchases, with the need for more information relative to regulatory, reliability, and economic drivers. The analysis will be updated to determine the most cost-effective compliance decisions while maintaining future flexibility and preserving system reliability in the strategy.

1.2 Strategy Assumptions

As a result of the ECS process, the ten-year outlook for operational generating units is summarized in **Figure 2.** Details on the compliance requirements that drove this strategy, along with information on existing controls that continue to effectively operate to maintain compliance, are provided in Section 2. Environmental compliance requirements covered by AROs, including ash pond and landfill closures, are summarized in **Table 1** and **Table 2**. For these projects, 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 estimated closure timeframes in Table 2 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 generating plants are significantly influenced by generation output and how much operational ash is sold for beneficial use and not disposed of in the onsite landfill. For ash ponds and landfills associated with ash pond closure, 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.

Figure 22. Georgia Power 10-year Environmental Compliance Strategy Schedule

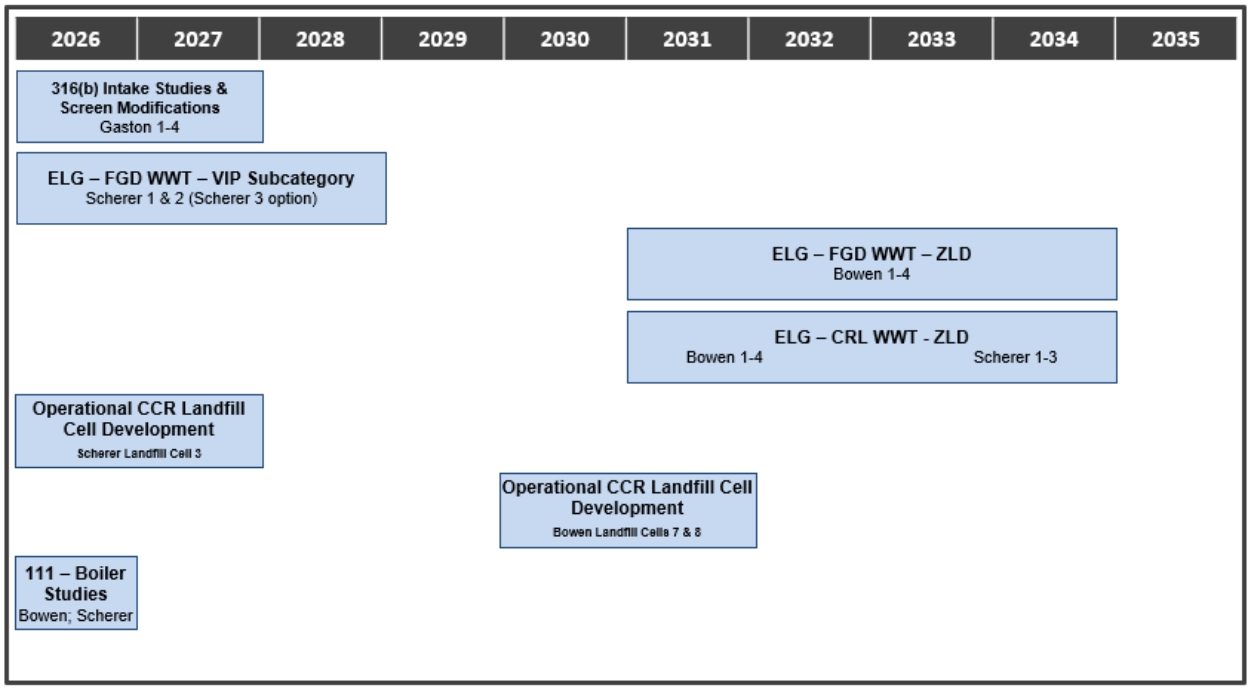


Table 11. Ash Pond Estimated Closure Construction Timeframes

	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**	**2027**
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**
Total	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.

Table 22. Landfill Estimated Closure Construction Timeframes

	Existing 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**	**2022[C]**
Scherer	1		**1**	**2039**
Wansley	1		**1**	**2035**
Yates	2[D]		**2**	**2025[A]**
Total	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

[C] Donates actual closure construction completion date. EPD approved GPC's request to extend the initiation of closure for Plant McIntosh for potential future disposal.

[D] Plant Yates Gypsum Landfill was released from its CCR permit on November 25, 2024.

2.0 Regulatory and Strategy Updates

The Company routinely monitors and evaluates environmental legislation and regulation applicable to electric generating units and power delivery as a part of the ECS process. This includes federal requirements stemming from the Clean Water Act ("CWA"), Resource Conservation and Recovery Act ("RCRA"), Clean Air Act ("CAA"), or other legislation, as well as relevant state rules and permitting requirements. These policy and regulatory reviews and the associated compliance strategy that results from the ECS process are categorized into water, CCR, and air topics in the following subsections.

On January 20, 2025, the executive branch released a series of Executive Orders ("Eos") one being "Unleashing American Energy." This EO required agencies to:

- Review of all existing agency rules, orders, guidance documents, settlements, consent orders, etc. "to identify …actions that impose an undue burden on the identification, development, or use of domestic energy resources – with particular attention to oil, natural gas, coal, hydropower, biofuels, critical mineral, and nuclear energy resources…."
- Suspend, revise or rescind identified unduly burdensome agency actions. (Initiate within 30 days) Coordinate with Attorney General office for appropriate legal action re: active litigation (e.g., stay or other delay).

Impacts from this as well as other new actions will be discussed in the sections that follow.

2.1 Water Regulatory and Strategy Updates

The water compliance strategy considers a variety of regulations related to water quality and use, including both nationwide standards, as well as state requirements for the use and discharge of water. Based on currently available information, the strategy to meet water compliance requirements is summarized in **Table 3**. The areas of legislation, regulation, permitting, or other actions that set or are anticipated to set critical water compliance requirements are discussed below.

Table 33. Cooling Type / Wastewater Treatment / ELG Technologies

Unit	316(b)	Low Volume Waste water	Bottom Ash	Fly Ash	FGD Wastewater (2020 ELG)	FGD Wastewater (2024 ELG)	Combustion Residual Leachate
Bowen 1 & 2[1]	Flow Monitor	Phys-Chem	RMDC	Dry Handling	Phys-Chem-Bio	Membranes +Evaporator/ Crystallizer	Evaporator/ Crystallizer
Bowen 3 & 4	Flow Monitor	Phys-Chem	RMDC	Dry Handling			
Gaston 1 – 4[1,2]	Intake Screens	Phys-Chem/ Pond	RMDC	Dry Handling	N/A	N/A	N/A
McDonough 4 – 6	Flow Monitor	N/A	N/A	N/A	N/A	N/A	N/A
McIntosh 10 & 11	Flow Monitor	Pond	N/A	N/A	N/A	N/A	N/A
Scherer 1 & 2	Flow Monitor	Phys-Chem	Ash Cooler	Dry Handling	Membranes	Membranes +Evaporator / Crystallizer	Evaporator/ Crystallizer
Scherer 3[1]	Flow Monitor	Phys-Chem	Ash Cooler	Dry Handling			
Yates 6 & 7	Flow Monitor	Pond	N/A	N/A	N/A	N/A	N/A

[1] Georgia Power's recommendation for the continued operations for Plant Bowen Units 1 and 2, as well as extending the operation of Plant Scherer Unit 3 and Plant Gaston Units 1 through 4 was approved in the 2025 IRP.
[2] Note that ash handling systems for Gaston 1-4 are only required for limited operation on coal as a backup fuel.
Control Equipment Key:
Phys-chem = physical and chemical treatment
Bio =biological treatment
RMDC = Remote Mechanical Drag Chain

2.1.1 Waters of the United States (33 CFR 328 and 40 CFR 120)

The regulatory definition of "waters of the United States" ("WOTUS") outlines the scope of waters federally regulated under the CWA. The definition affects all CWA programs that rely on this definition, including the NPDES permit program, the dredge-and-fill permit program, and oil spill prevention and response programs. Regulation regarding WOTUS is administered by the EPA and the U.S. Army Corp of Engineers (the "Corps" and together, "the Agencies").

In August 2015, the Agencies issued a final rule redefining waters of the United States ("WOTUS") to significantly expand jurisdiction to include features such as ephemeral drainages and isolated ponds at industrial facilities. This definition was repealed in April 2020 with the Navigable Waters Protection Rule ("NWPR"), restoring the pre-2015 regulatory text. Following a 2021 court order, implementation of the NWPR was halted, and WOTUS was interpreted under the pre-2015 regime. Pursuant to Executive Order 13990, the Agencies announced plans to replace the NWPR, and in December 2021, EPA proposed a rule to repeal the 2020 NWPR and reinstate regulations defining WOTUS as they existed prior to 2015, consistent with relevant Supreme Court decisions.

On January 18, 2023, the Agencies published the final updated WOTUS definition ("Phase I WOTUS"), which was challenged by multiple parties, including the State of Georgia, in several courts across the U.S. and stayed in 27 states, including Georgia. On May 25, 2023, the U.S. Supreme Court issued its decision in *Sackett v. EPA*, which effectively invalidated portions of the 2023 WOTUS rule that would have changed the way wetlands are defined and determined by the Corps. On September 8, 2023, the EPA and Corps published the final revised WOTUS rule, with the stated intent of aligning the definition of WOTUS under the CWA with the U.S. Supreme Court's May 25th decision in *Sackett v. EPA*. The Agencies have indicated that they are "developing regionally-specific tools to facilitate implementation," and emphasized that they have "a wide range of available approaches" to address remaining issues, including permitting actions, jurisdictional determinations, guidance, rulemakings, and agency forms and training materials.[1] As a result of the existing injunctions in 27 states, the revisions do not yet apply in those states, including Georgia.

New Regulatory Updates

On November 20, 2025, the Agencies collectively published a proposed rule to revise the definition of WOTUS to comply with the U.S. Supreme Court's decision in *Sackett v. EPA*. The Agencies stated the proposed redefinition is intended to "ensure clarity and predictability" by defining for the first time terms such as "relatively permanent" and "continuous surface connection," and establishing "clear boundaries that indicate the distinction of Federal versus State and Tribal coverage of waters." A final rule is expected in 2026.

The Company continues to follow developments of regulatory definitions of WOTUS because of the potential impacts to CWA programs like the NPDES permitting program and programs regulating

[1] 88 Fed. Reg. 61,964, 61,966 (Sept. 8, 2023).

wetland and stream impacts for new development and infrastructure maintenance. The impacts of definitional changes to WOTUS can impact costs, and schedule impacts for new generation and power delivery construction projects.

2.1.2 Cooling Water Intake Structures (40 CFR 122 and 125)

Section 316(b) of the CWA ("316(b)") requires that the location, design, construction, and capacity of any cooling water intake structure reflect Best Technology Available ("BTA") to minimize adverse impacts from impingement and entrainment of fish, shellfish, and other aquatic organisms. In August 2014, EPA published a final 316(b) rule that established impingement mortality and entrainment requirements for existing power generating facilities and manufacturing and industrial facilities that are designed to withdraw more than 2 million gallons per day from WOTUS and use at least 25 percent of the water they withdraw exclusively for cooling purposes.

Facilities subject to the rule must comply with one of seven options identified for impingement mortality, which include modified traveling screens and closed-cycle recirculating cooling. For entrainment, the rule relies on the determination of BTA requirements by the permitting authority on a site-specific basis.

2.1.2.1 316(b) Compliance Strategy

For purposes of 316(b) rule compliance, Plants Bowen, McDonough, McIntosh CC, Scherer, and Yates employ closed-cycle cooling, which EPD has determined complies with the impingement and entrainment BTA requirements of the 316(b) rule. As such, the only requirement EPD has or is expected to add when NPDES permits are renewed is the addition of intake flow monitoring equipment, where not already installed, or an alternative flow calculation method, to demonstrate effective operation as a closed-cycle cooling facility.

Plant Gaston's strategy for 316(b) compliance includes intake screen modifications with a fish-friendly return system to reduce impingement and entrainment of aquatic species. The final 316(b) compliance strategy will be determined through the NPDES permit process by the Alabama Department of Environmental Management ("ADEM"). The timing of the installation is dependent on the permit issuance, with a current projected compliance date of 2027.

2.1.3 Steam Electric Effluent Limitations Guidelines (40 CFR 423)

The ELGs for steam electric power generating facilities establish technology-based effluent limitations for wastewater discharges. In November 2015, EPA updated the steam electric ELGs for the first time since 1982 (the "2015 Rule"), requiring compliance as soon as November 1, 2018, but no later than December 31, 2023, as determined by the NPDES permitting authority, EPD. Technology-based standards affecting coal ash management included a ZLD limit for bottom ash and fly ash transport water and new limits for direct discharges of "legacy wastewater," which includes water remaining in ash ponds. The 2015 Rule also distinguished CRL (wastewater collected from lined landfills) from low volume wastewater and set mercury, arsenic, selenium, and nitrate-nitrite limits for FGD wastewater. The rule established a Voluntary Incentives Program ("VIP") for

FGD wastewater providing a later compliance deadline of December 31, 2023, for plants able to meet more stringent FGD wastewater limits based on advanced evaporation technology.

With pending legal challenges and petitions for reconsideration, in 2017, the then-EPA Administrator took actions that pushed out the earliest compliance dates, specifically for bottom ash transport water and FGD wastewater, by two years to November 1, 2020, to provide time for EPA to reconsider the standards for those waste streams. In addition, in April 2019, the U.S. Court of Appeals for the Fifth Circuit vacated aspects of the 2015 Rule related to legacy wastewater and CRL, determining that EPA should have considered more advanced technology in setting the standards and requiring EPA to consider revising these portions of the rule.

In October 2020, EPA finalized revisions to the ELGs for steam electric power generating facilities ("ELG Reconsideration Rule") for FGD wastewater and bottom ash transport water, providing a two-year extension of compliance time frames to no later than December 31, 2025, for these waste streams. For bottom ash transport water, the rule established a case-by-case permitting mechanism to recognize that some systems may require a limited purge rate, rather than a blanket no discharge limit as established in the 2015 Rule. For FGD wastewater, the ELG Reconsideration Rule established standards based on wastewater treatment technology consisting of a combination of chemical precipitation followed by biological treatment (also referred to as physical-chemical-biological treatment or "phys-chem-bio"). As compared to the 2015 Rule, the FGD wastewater limits were slightly less stringent for arsenic and selenium and significantly more stringent for mercury and nitrate-nitrite.

The ELG Reconsideration Rule also revised or established subcategories with tailored limits and applicability dates. The revised VIP subcategory for FGD wastewater provides until December 31, 2028, for plants to achieve more stringent ELGs for mercury, arsenic, selenium, nitrate-nitrite, bromide, and total dissolved solids based on membrane filtration. A new subcategory was established that provided a compliance exemption for Electric Generating Units ("EGU") that will permanently cease the combustion of coal (through retirement or repowering) no later than December 31, 2028. For the cessation of coal combustion subcategory and for the VIP subcategory, a NOPP was required to be submitted by the facility to the permitting authority by October 2021. Two other new subcategories, high FGD wastewater flow plants and EGUs with capacity factors of less than 10%, do not apply to Georgia Power operations.

In 2020, the ELG Reconsideration Rule was challenged by environmental groups and consolidated in the U.S. Court of Appeals for the Fourth Circuit, with industry groups intervening in the case. In 2021, the court granted EPA's motion to put the case on hold while EPA reviewed the ELG Reconsideration Rule. EPA announced in August 2021 that it would initiate a new rulemaking but stated that permitting authorities should continue to implement the ELG Reconsideration Rule requirements during the process.

On May 9, 2024, EPA published the final Supplemental ELG Rule, which includes the following key provisions:

- *ZLD requirement for FGD wastewater, bottom ash transport water, and combustion residual leachate:* The Supplemental ELG Rule sets more stringent ZLD requirements with compliance required by no later than December 31, 2029. The VIP and cessation of coal combustion subcategories remain unchanged from the 2020 Rule. In the 2024 Rule, EPA also maintains the 2020 Rule FGD wastewater requirements and the December 31, 2025 deadline for phys-chem-bio treatment to meet arsenic, mercury, selenium, and nitrate-nitrite limitations until the applicability dates of the new zero-discharge limitations are met (no later than December 31, 2029).
- *EGUs PCCC by 2034*: Facilities qualify for this subcategory by satisfying the 2020 Rule's generally applicable limits for FGD wastewater and bottom ash transport water and ceasing coal combustion (retire or repower) by December 31, 2034. This option requires filing a NOPP by December 31, 2025.
- *Discharges of unmanaged CRL:* EPA defined unmanaged CRL as, (1) discharges of CRL that the permitting authority determines are the Functional Equivalent Direct Discharge to a WOTUS through groundwater or (2) discharges of CRL that has leached from a waste management unit into the subsurface and mixed with groundwater before being captured and pumped to the surface for discharge directly to a WOTUS. The Supplemental ELG Rule establishes technology-based limitations for arsenic and mercury based on chemical precipitation by a date determined by the permitting authority that is as soon as possible beginning July 8, 2024, but no later than December 31, 2029.
- *Additional waste streams:* For legacy wastewater (ash pond dewatering), and CRL from previously retired facilities, EPA did not establish new technology-based limitations. For these waste streams, EPD, must establish site-specific technology-based limits using its Best Professional Judgment ("BPJ").
- *NOPP Transfers:* The final rule retained the 2020 ELG Reconsideration Rule transfer provisions, which provide the flexibility to transfer between subcategories or to the 2020 VIP provisions until December 31, 2025.
- *Website requirements:* Similar to the CCR website requirements, the final rule also requires facilities to maintain an "ELG Rule Compliance Data and Information" website that makes available to the public all reporting and recordkeeping information. [2]

Numerous groups (including the Utility Water Action Group, "UWAG"), electric generators, and states filed petitions challenging the rule in multiple federal circuit courts, and, on June 14, 2024, the challenges were consolidated in the U.S. Court of Appeals for the Eighth Circuit. On July 26, 2024, UWAG, electric generators, and state petitioners filed a motion to stay the rule pending judicial review, which was denied on October 10, 2024.

New Regulatory Updates

The Final 2024 Supplemental ELG Rule litigation continues to be held in abeyance. On January 30, EPA filed a motion asking the court to continue to hold the case in abeyance until 30 days after the

[2] https://www.georgiapower.com/our-impact/environment/environmental-compliance/compliance-information.html#elg

publication of a final rule addressing unmanaged CRL. On February 20, 2026, the Eighth Circuit granted EPA's request to continue to keep the case in abeyance while further rulemakings proceed.

The EPA stated in its motion that it anticipated issuing a final rule extending certain 2024 ELG Rule compliance deadlines by the end of 2025 and also that it would issue a second more substantive rulemaking at which time it anticipates that some or all of the petitioners may decide not to continue with this litigation.

On December 31, 2025, EPA published the final rule extending compliance deadlines with the following key provisions:

- *2034 NOPP Filing Deadline Extension*: Extends the 2034 NOPP filing deadline by six-years, from December 31, 2025 to December 31, 2031.
- *Zero-Discharge Compliance Deadline Extension*: Extends the latest compliance deadline for achieving zero-discharge limitations for FGD wastewater, BATW, and CRL by five-years, from December 31, 2029 to December 31, 2034. The proposed rule does not change the earliest compliance deadline, of July 8, 2024.
- *Expansion of Transfer Provisions:* Allows facilities to switch between (a) generally applicable zero-discharge requirements and (b) the 2034 PCCC subcategory. Transfers in either direction would be allowed until December 31, 2034.
- *Site-Specific Deadline Extensions:* Proposed new permit conditions allowing permitting authorities to set alternative compliance dates based on site-specific "unexpected and uncontrollable circumstances" (e.g., supply chain disruptions or sudden changes in local energy demand) and applies to FGD wastewater, BATW, and CRL. Allows NOPP filings after December 31, 2025 related to the 2028 PCCC subcategory and subcategory transfers. Facilities must submit an initial request letter and regular progress reports to justify and document the need for alternative timing, which is due 60 days after unexpected circumstances or after publication of final rule.

Numerous groups filed petitions challenging the rule in multiple federal circuit courts, and, on February 10, 2026, the challenges were consolidated in the U.S. Court of Appeals for the Second Circuit. On February 18, 2026, the Utility Water Act Group, of which Southern Company is a member, filed a Motion to Intervene in opposition to the challenges filed by the petitioners.

2.1.3.1 ELG Compliance Strategy

The Company's strategy for compliance with ELG requirements for fly ash and bottom ash waste streams necessarily considered the state and federal CCR rules, as well as ELG requirements. To meet the timing requirements for the CCR rules, fly ash and bottom ash handling projects were completed by 2019 in order to discontinue the use of the ash ponds. For fly ash, projects included conversions to pneumatic (dry handling) systems that convey ash via vacuum/blowers to collection hoppers and silos for beneficial use or landfill disposal at Plants Bowen and Scherer. Compliance options to meet zero discharge of bottom ash included either an under-boiler or remote system. The technology decision for each site was primarily determined by space availability and headroom constraints under the boiler. The Company's strategy for bottom ash transport water compliance was installation of "dry" handling Ash Coolers at Plant Scherer and "wet" remote mechanical drag chains ("RMDCs") at Plant Bowen. In addition to ash management projects, the Company implemented changes and/or additions to low volume wastewater treatment systems at all affected sites to cease ongoing use of the ash ponds.

Compliance with the ELG Reconsideration Rule for FGD wastewater is a site-specific effort that requires a tailored design for each facility's water chemistry and water volume needs, as well as site-specific logistics and space availability. After evaluation of the different compliance pathways allowed by the ELG Reconsideration Rule, the Company filed NOPPs with EPD by the required October 13, 2021, deadline. These filings notified EPD of the Company's intent to permanently cease coal combustion no later than December 31, 2028, for Plant Bowen Units 1 and 2, Plant Scherer Unit 3, and Plant Wansley Units 1 and 2; to pursue ELG compliance for Plant Scherer Units 1 and 2 through the VIP subcategory with a compliance deadline of December 31, 2028; and to comply with the generally applicable requirements for Plant Bowen Units 3 and 4 by December 31, 2025. For Plant Gaston Units 1-4, a NOPP was submitted to ADEM indicating the intent to permanently cease coal combustion through retirement by December 31, 2028. In the 2022 IRP, the Commission approved the retirements of Plant Wansley Units 1 and 2 in August 2022, and Plant Scherer Unit 3 and Plant Gaston Units 1-4 by December 31, 2028. The Commission deferred the decision for retirement of Plant Bowen Units 1 and 2 to the 2025 IRP.

In October 2023, the Company filed a 2023 IRP Update in response to extraordinary load growth and an accelerated capacity need beginning in the winter of 2025/2026 – a full three years earlier than projected in the 2022 IRP. With the continuing increase to the Company's projected load forecast and the magnitude of capacity needs in 2028 and beyond, for planning purposes, the Company has assumed continued operations through 2035 for Plant Bowen Units 1-2. The Company also reviewed capacity needs in a scenario in which Plant Scherer Unit 3 and Plant Gaston Units 1-4 continue operating through 2035. In January 2025, the Company made a formal recommendation in the 2025 IRP on the continued operations for Plant Bowen Units 1 and 2, as well as extending the operation of Plant Scherer 3 and Plant Gaston Units 1-4 beyond the previously approved retirement dates in 2028.

In July 2025, the Georgia PSC approved Georgia Power's request to extend the operation of Plant Scherer Unit 3 through at least December 31, 2035 and Plant Gaston Units 1-4 through December 31, 2034. In addition, the approved 2025 IRP assumes operation of Plant Bowen Units 1 and 2 through at least December 31, 2035. This approval does not impact the Company's FGD wastewater treatment strategy for Plants Bowen and Scherer as the wastewater treatment systems are common environmental controls for all units at each site. Plant Gaston does not have FGD wastewater. To meet 2020 Rule generally applicable limitations of zero discharge, Gaston plans to continue use of a RMDC system currently onsite but will require additional pipe installations. On September 17, 2025, Alabama Power submitted an Automatic Transfer NOPP authorizing compliance with the 2020 ELG rule generally applicable limits for bottom ash transport water for Plant Gaston Units 1 through 4 by December 31, 2025. Georgia Power submitted a NOPP on December 31, 2025 indicating plans to pursue compliance with the 2020 ELG rule for Plant Scherer Unit 3 through the voluntary incentive program by no later than December 31, 2028.

The Company's R&D and testing of water treatment technologies, as further discussed in Appendix C, has included phys-chem-bio treatment systems, as well as membrane-based treatment systems. Based on this research and testing, the Company selected a phys-chem-bio treatment system for Plant Bowen Units 1-4 which went into commercial operation on December 31, 2025. Based on plant-specific equipment and operational characteristics, the Company has selected a membrane-

based technology system to meet the VIP compliance subcategory requirements for Plant Scherer Units 1-3 by December 31, 2028. The site-specific water quality and quantity characteristics at Plant Scherer are a unique technical fit for the VIP pathway, allowing the membrane technology to be cost competitive.

As required by EPA in the 2020 Reconsideration Rule that remains in effect, the Company continues to pursue the procurement, construction, and operation of the FGD wastewater projects described above for Plant Bowen and Plant Scherer. However, the requirements of the final 2024 Supplemental ELG Rule create additional treatment needs for Plant Bowen. The Company has worked diligently to analyze compliance with the rule as part of its technical and economic process in the 2025 IRP. For Plant Bowen, two alternatives have been identified as potentially feasible. First, the Company previously analyzed a membrane-evaporator-crystallizer system when the 2024 Rule was proposed and provided comments to EPA on the technical and economic challenges of implementation. Despite these challenges, the membrane-evaporator-crystallizer system (among others) was established by EPA in the 2024 Rule as the technology basis for the ZLD limit. The Company has included control assumptions and costs related to installation of a membrane-evaporator-crystallizer treatment system in this ECS and 2025 IRP. Second, the Company is investigating and considering an evaporator-only system that would exclude the membrane system from the previous option. The evaporator-only system presents brine management challenges that are being studied. The technology and brine management approaches for an evaporator-only system are not commercially available as part of a comprehensive vendor-supplied ZLD package. There is ongoing piloting of an evaporator-only system to determine suitable brine management options. Should the evaporator-only treatment system show appropriate technical viability and costs compared to the membrane-evaporator-crystallizer system, the Company will pursue the evaporator-only system. The benefits of this dual-path evaluation include the ability to perform further technical feasibility analysis, adjust to future regulatory changes, and provide the flexibility to install the best technology for the plant-specific FGD wastewater volumes and characteristics.

In addition, the final rule requires ZLD of CRL at operational coal-fired facilities, which is significantly more stringent than the physical-chemical treatment-based limits EPA indicated in the proposed rule. Due to this departure from what was proposed, the Company has been limited in its ability to analyze ZLD options for CRL. Currently, the Company's plan for leachate treatment at the operational coal-fired facilities, Plant Bowen and Plant Scherer, is based on an evaporative process and estimated costs are only at a prescreening level of certainty. For facilities that have previously retired coal-fired generation, the rule requires the permitting authority (EPD) to establish site-specific technology-based limits using BPJ. CRL treatment systems based on physical-chemical treatment are assumed for CCR landfills at retired facilities with costs reflected in the Company's CCR-ARO. Similarly, for legacy wastewater produced during ash pond closure activities, the Company's plans already include treating all contact water under dewatering plans approved by the EPD, as discussed further in Section 2.2. The Supplemental ELG Rule's requirement for case-by-case technology-based effluent limitations established by the permitting authority requires further review and potential permitting actions. However, the existing treatment technology assumptions and associated costs are being maintained for planning purposes.

As noted with other regulations in this ECS, the Supplemental ELG Rule is currently in active litigation, and the final outcome of the case is still pending. The Deadline Extensions Rule published on December 31, 2025, extends the ZLD compliance dates to December 31, 2034, but it will not be effective until March 2, 2026, and is currently in the early stage of litigation. A further proposed rulemaking revisiting ZLD as the required technology is expected in 2026, with a final rule likely in 2027 or 2028. The Company is actively pursuing compliance with the deadlines in the 2020 Reconsideration Rule and is prepared to achieve compliance with the ELG Supplemental Rule as published. However, with the extension dates in mind, the Company has adjusted the capital spend to reflect these dates.

2.2 Coal Combustion Residuals Regulatory and Strategy Updates

The CCR ECS (as approved in the 2019, 2022, and 2025 IRP proceedings, Docket Nos. 42310, 44160, and 56002 respectively) focuses on federal and state regulations related to ash pond closures and CCR management, as summarized in **Table 4**. Per the 2022 IRP Final Order, any determination by the EPD causing a change in closure strategy requires the Company to notify the GPSC within 30 days of such determination. The areas of legislation, regulation, permitting, or other actions that set or are anticipated to set critical CCR compliance requirements are discussed below.

Table 4. 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]
Total	20	9	**29**	**13**

[A] Arkwright landfills are planned to be closure by removals. *Arkwright AP-1 and AP-3 are classified as Legacy Surface Impoundments under the EPA Legacy Rule.*
[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.

2.2.1 Federal CCR Rule Revisions (40 CFR 257)

On April 17, 2015, EPA published in the Federal Register requirements regarding the management and disposal of CCR titled, 40 CFR Parts 257 and 261: Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule, ("Federal CCR Rule"). Through this rulemaking, EPA designated CCR to be regulated as non-hazardous waste. The Federal CCR Rule was issued as a "self-implementing" rule that set national minimum standards for the management of CCR. The Federal CCR Rule, which became effective on October 19, 2015, established requirements regarding the design, operation, closure, post-closure care, groundwater monitoring and corrective action all of which are publicly available for new and existing CCR landfills and surface impoundments, including any lateral expansions of such units, and inactive surface impoundments located at active electric generating facilities. Failure to demonstrate compliance with certain criteria by specified deadlines resulted in required closure of the CCR unit, with specific requirements around closure timeframes and methods. The Federal CCR Rule explicitly authorized both closure in place and closure by removal as options, with each option subject to its own set of closure performance criteria.

Since the original publication of the Federal CCR Rule, there have been several developments related to litigation, administration policy changes, or legislative actions that amended the requirements or changed how the rule is enforced, as discussed below.

Federal CCR Rule Revisions: 2015 Litigation and 2016 Settlement Agreement

In December 2015, several parties, including industry and environmental groups, filed legal challenges to the Federal CCR Rule. In June 2016, the D.C. Circuit Court approved a settlement addressing several, but not all, issues that were raised in the CCR litigation. As part of the settlement, the court vacated the three-year closure exemption for inactive surface impoundments, and EPA agreed to finalize rulemaking to address a number of technical issues. For the three-year closure exemption, in August 2016, EPA finalized a roughly 1.5-year extension of certain compliance dates for surface impoundments that were to close within three years under the Federal CCR Rule.

Water Infrastructure Improvements for the Nation Act (WIIN Act, Section 2301)

In December 2016, the Water Infrastructure Improvements for the Nation Act ("WIIN Act") was approved by the U.S. Congress, including a section that amends a portion of RCRA to allow states to submit their CCR permit programs for EPA approval. An EPA-approved state permit program provides more regulatory certainty and reduces the burden of overlapping regulations since it would authorize states to enforce state regulations for CCR units and operate a permitting program in lieu of the Federal CCR Rule.

Federal CCR Rule Revisions: 2017 Petition for Reconsideration, Phase One and Two Amendments

In September 2017, EPA granted a Petition for Reconsideration of the Federal CCR Rule filed by the Utility Solid Waste Activities Group ("USWAG"), an industry group of which Southern Company is a member. In November 2017, EPA outlined a phased approach to amending the Federal CCR Rule,

with intent to cover numerous technical requirements with a Phase One and Phase Two rulemaking schedule, and subsequently issued both Phase One and Phase Two proposed rulemakings.

While the proposed Phase One Rule covered numerous technical requirements, only a subset of these provisions was finalized in July 2018 with Part One of the Phase One Amendments to the Federal CCR Rule ("Phase One, Part One Rule"). The Phase One, Part One Rule established groundwater protection standards for lithium, molybdenum, cobalt, and lead and extended the deadline to cease receipt of both CCR and non-CCR wastes to October 31, 2020, under certain conditions. As a result of litigation, in March 2019, the D.C. Circuit granted EPA's request to voluntarily review and revise the rule, but it left the rule requirements in place in the meantime.

In August 2019, the EPA published the Phase Two proposed amendments, which addressed criteria relating to beneficial use practices, proposed a potential boron groundwater protection standard, and required groundwater data and annual reports to be more accessible and transparent to the public. In December 2020, the EPA sought additional comment related to these proposed amendments, especially on beneficial use processes, but has not yet taken final action.

Federal CCR Rule Revisions: 2018 Litigation, Part A and Part B Rulemakings

In August 2018, the U.S. Court of Appeals for the D.C. Circuit issued a decision that: (1) vacates an exemption from the Federal CCR Rule for inactive surface impoundments at inactive power plants; (2) requires all unlined surface impoundments to close, irrespective of whether the impoundments are meeting the rule's groundwater protection standards; and (3) vacates a provision that classified certain clay-lined impoundments as "lined," meaning that all clay-lined impoundments are considered unlined and must close. As a result of the court decision, EPA was required to revisit certain elements of the Federal CCR Rule.

After the D.C. Circuit decision, EPA proposed two separate rulemakings to address certain issues, one titled "A Holistic Approach to Closure Part A: Deadline to Initiate Closure" ("Part A Rule") and the other titled "Holistic Approach to Closure Part B; Alternate Demonstration for Unlined Surface Impoundments; Implementation of Closure" ("Part B Rule"). In August 2020, EPA finalized the Part A Rule, which incorporated a new deadline for unlined impoundments to cease receipt of waste and initiate closure no later than April 11, 2021; extended the existing alternative closure extensions to include CCR and non-CCR waste streams; added requirements for the publicly accessible CCR website; and changed the classification of compacted-soil lined, or "clay-lined," surface impoundments to "unlined." In November 2020, EPA finalized a portion of the proposed Part B Rule, providing a pathway for owners/operators to demonstrate that alternative liner systems, such as natural clay, perform as well as or better than the composite liner systems required by the Federal CCR rule.

Federal Part A Rule and Part B Rule Determinations

In January 2022, EPA issued proposed determinations for multiple facilities across the industry in response to compliance extension requests to allow continued use of facility specific surface

impoundments under the Part A Rule. In EPA's review of Part A applications, EPA expressed new interpretations of various aspects of the Federal CCR Rule that include questioning the adequacy of:

- Closure plans demonstrating how CCR units would meet closure performance standards when the unit is to be closed in contact with groundwater or to be closed without preventing the horizontal infiltration of liquids;
- Groundwater monitoring networks;
- Alternate source demonstrations;
- Timing of remedy selection for CCR units that are in corrective action;
- Qualified Professional Engineer certifications; and
- Beneficial use of CCR to close units.

Georgia Power did not apply for a Part A extension as the Company had initiated closure by 2019. In April 2022, USWAG and a group of utilities filed petitions for review in the D.C. Circuit Court of Appeals, challenging EPA's January 2022 actions. The primary basis of the challenge was whether EPA's actions are new "legislative" rules that should have been subject to notice-and-comment rulemaking. Throughout 2022 and 2023, EPA continued to issue Part A determinations related to facilities outside of Georgia.

In February 2023, EPA issued proposed denials for all of the Part B Rule applicants (Georgia did not apply for Part B extension) that were demonstrating their alternative liners would ensure the protection of human health and the environment to be able to continue to use the CCR unit, along with a press release announcing their decisions. EPA proposed to deny six of the demonstrations and issue one letter finding that a facility's demonstration was insufficient to show that its liners meet the criteria for an alternative composite liner. EPA's letter describes alleged compliance issues and notes that the facility is no longer eligible for utilizing the schedule under the Part B rule for continued usage of the pond. EPA's reasoning for denying all Part B applications include inadequate groundwater monitoring networks, insufficient alternate source demonstrations, inadequate documentation for the design and performance of the impoundment liners, and failure to meet all location restrictions.

On June 28, 2024, the U.S. Court of Appeals for the D.C. Circuit issued a decision dismissing industry challenges to the EPA's January 11, 2022, actions and interpretations related to the closure performance standards in the 2015 CCR Rule. The Court concluded that it lacked jurisdiction over the challenges because the January 2022 actions and interpretations were not new rules, but an application of the 2015 Federal CCR Rule.

National Enforcement and Compliance Initiatives

In August 2023, EPA added CCR enforcement to its National Enforcement and Compliance Initiatives ("NECI") for the next four fiscal years (October 2023 to September 2027). EPA indicated it will focus on "conducting investigations, particularly at coal ash facilities impacting vulnerable or overburdened communities; taking enforcement action at coal ash facilities that are violating the law; and protecting and cleaning up contaminated groundwater, surface water, and drinking water

resources.[3] In 2023, EPA began developing a number of enforcement cases across EPA regions, seven of which have been resolved through settlement, including one in Region 4. To date, no facilities in Georgia have been the subject of EPA enforcement.

On March 12, 2025, EPA's Office of Enforcement and Compliance Assurance issued a memorandum titled *Implementing National Enforcement and Compliance Initiatives Consistently with Executive Orders and Agency Priorities* to provide initial guidance on implementing the FY 2024–2027 NECI in a manner consistent with the President's Executive Orders and with Administrator Zeldin's "Powering the Great American Comeback" Initiative. The guidance imposes an advance-approval requirement for any CCR enforcement action "that would unduly burden or significantly disrupt power generation." Since issuance of the March guidance, EPA has not publicly announced any new CCR enforcement actions, and existing cases are subject to a "compliance first" policy, issued on December 5, 2025, which directs EPA enforcement personnel to prioritize ensuring timely compliance.[4]

Federal CCR Rule Revisions: Legacy CCR Surface Impoundments Rule

On May 8, 2024, EPA published the *Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments* (i.e., Legacy Rule) to the Federal Register, with an effective date of November 8, 2024, which establishes two new categories of federally regulated CCR units: legacy surface impoundments and CCRMUs. Legacy surface impoundments are surface impoundments that no longer receive CCR but contained both CCR and liquids on or after October 19, 2015, and are located at an inactive electric utility or independent power producer. CCRMUs are defined as 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 final Legacy Rule is summarized as follows:

- Requires designation of legacy surface impoundments through applicability reports by November 8, 2024, see table 5 below.
- Requires owners of an active facility or inactive facility with one or more legacy surface impoundments to initiate a two-step facility evaluation process to identify all CCRMUs at the facility. The Part 1 report is due in 2027 and will include evaluations of historical and current documents, desktop studies, and a site evaluation plan to identify data gaps. The Part 2

[3] Memorandum from David M. Uhlmann, Assistant Adm'r, Office of Enf't & Compliance Assurance, EPA, to Reg'l Adm'rs et al. (Aug. 17, 2023), https://www.epa.gov/system/files/documents/2023-08/fy2024-27necis.pdf.

[4] Memorandum from Craig J. Pritzlaff, Acting Assistant Adm'r, Office of Enf't & Compliance Assurance, EPA, to OECA Office Dirs. & Deputies et al. (Dec. 5, 2025), https://www.epa.gov/system/files/documents/2025-12/reinforcing-a-compliance-first-orientation-for-compliance-assurance-and-civil-enforcement-activities.pdf.

report is due in 2028 and will include any information from the physical site evaluation as well as identify CCRMUs to be regulated. EPA has since finalized a CCRMU Deadline Extension Rule that extends the compliance deadlines to complete the facility evaluation reports to 2027 and 2028.

- Requires legacy surface impoundments and CCRMUs to meet certain existing regulatory requirements, including a requirement to initiate closure by 2028 for legacy surface impoundments and by 2032 for CCRMUs, consistent with the CCRMU Deadline Extension Rule.
- Provides the option to defer closure of previously closed units where certain criteria have been met.
- Finalized an alternative provision for closure by removal that will allow owners or operators to certify completion of closure while conducting groundwater monitoring and corrective action during post-closure care.
- Includes definitions for infiltration and liquids. These new definitions largely reflect EPA's evolving interpretations of related closure in place performance standards, first announced in January 2022, which suggest that lateral infiltration, in addition to vertical, must be minimized to the extent feasible. The new definitions further expand the long-standing practice of dewatering to include groundwater and not just the free water necessary to allow for stability needed to install effective final cover systems.

Multiple petitions for review challenging the Legacy Rule, including retroactive applicability of the Legacy Rule definitions, were filed, and on August 9, 2024, the petitions were consolidated into one case in the U.S. Court of Appeals for the D.C. Circuit. Petitioners include industry trade associations (including USWAG), a coalition of states, and electric generators. On August 19, 2024, Petitioner East Kentucky Power Cooperative ("EKPC") filed a motion seeking to stay the Legacy Rule pending judicial review. On November 1, 2024, the D.C. Circuit denied the stay motion. EKPC filed an emergency stay application with the U.S. Supreme Court which was denied by the Court on December 11, 2024.

On November 8, 2024, the EPA published a direct final rule that included technical corrections for the Legacy Rule, addressing errors in the regulatory text. The direct final rule became effective February 6, 2025.

On January 16, 2025, the EPA published an additional direct final rule and companion proposal that included technical corrections to the Legacy Rule (2nd Technical Corrections Rule). However, due to receiving adverse comments, EPA withdrew the technical corrections rule on March 20, 2025. EPA finalized several amendments in the CCRMU Deadline Extension rule including fixing incorrect regulatory text citations and clarifying/adding provisions in the regulatory text to match what is described in the preamble to the legacy CCR rule.

The Company is engaged in comprehensive permitting efforts with EPD to review new regulatory interpretations and evaluate whether they affect or necessitate change to the existing closure plans.

New Regulatory Updates

With the change in administration, EPA has begun to revisit previous positions, which has led to significant activity in 2025 and early 2026.

- Consistent with the EOs "Unleashing American Energy"
  - On March 12, 2025, EPA announced it would undertake several regulatory actions related to the CCR rule including reviewing and reconsidering certain aspects of the Legacy Rule and granting short and long term relief such as extending compliance deadlines. In addition, EPA Administrator Lee Zeldin emphasized cooperative federalism to allow states to lead on local issues with federal support. EPA communicated it intends to work with states to implement and oversee the CCR regulations.
  - On March 20, 2025, EPA approved Salt River Project's request to extend the deadline to cease using its Coronado Generating Station evaporation pond due to grid reliability issues and resource adequacy concerns.
  - On April 8, 2025, EPA Administrator Zeldin released a statement on actions EPA will take in support including:
    - Extension for Coronado Generating Station, Arizona: EPA quickly approved Salt River Project's application for an Alternative Liner Demonstration, which would allow them to continue to operate their evaporation pond and prevent grid reliability issues, particularly during peak summer months.
    - Support for State Coal Ash Permitting Programs: EPA announced its intent to propose approvals for Wyoming and North Dakota's coal ash permit programs by May 11 to advance cooperative federalism and encourage states to pursue oversight and permitting of coal ash within their borders.
    - Review of Legacy-CCR Management Units Rule: EPA stated it was considering granting short- and long-term relief such as extending compliance deadlines and aimed to complete rule changes within a year.
  - On May 16, 2025, EPA published its proposed approval of North Dakota's Department of Environmental Quality's CCR Permit Program. The approval was finalized on November 5, 2025, making it the fourth state approved permit program to operate in-lieu of the Federal CCR Rule under the WIIN Act.
  - On July 22, 2025, EPA released a direct final rule and companion proposed rule extending the deadlines for compliance with the Facility Evaluation Report (FER) Part 1 & 2, groundwater monitoring, and closure requirements for owners and operators of CCR management units.
  - On August 28, 2025, EPA published its proposed approval of Wyoming Department of Environmental Quality's CCR Permit Program. The approval was finalized on February 24, 2026, making it the fifth state approved permit program to operate in-lieu of the Federal CCR Rule und the WIIN Act.
  - On September 4, 2025, EPA published a notice withdrawing the direct final rule due to receipt of adverse comment and extending the comment period for the companion proposed rule through September 15th with a public hearing scheduled for September 12th.
  - On November 28, 2025, EPA published its proposal to extend the closure deadline for certain CCR surface impoundments operating under the alternative closure provisions in the "Part A Rule" from October 17, 2028 to October 17, 2031. Georgia Power met the original cease receipt date of April 2021 and therefore did not submit any such extension request to EPA.
  - On December 16, 2025, the D.C. Circuit Court granted EPA's motion to continue to hold the CCR Legacy Rule in abeyance and ordered the Agency to file its next status report by

March 16, 2026 (and every 90 days thereafter). In seeking an abeyance, EPA represented that it was "actively developing a proposed rule" revising the Legacy Rule.

- On February 10, 2026, EPA published its final CCRMU Deadline Extension Rule to the Federal Register with an effective date of February 9, 2026. The CCRMU Extension Rule extends the deadlines for the Facility Evaluation Report ("FER") Parts 1 and 2, groundwater monitoring requirements, and certain closure requirements. Additionally, the final rule finalizes several corrections originally proposed in January 2025 to resolve errors in the 2024 Legacy Rule which includes correcting typographical errors and correcting the initial annual groundwater monitoring report deadline for Legacy Surface Impoundments ("Legacy SI") to January 31, 2028.
- According to the 2025 Spring Unified Agenda, EPA expects to finalize the Federal CCR Permit Program in December 2026 and expected to propose the Legacy Reconsideration Rule in January 2026 and finalize it in October 2026, although the proposal has been impacted by regulatory delays.

State Coal Combustion Residuals Rule (391-3-4-.10) ("Georgia CCR Rule")

In November 2016, the Georgia EPD adopted amendments to the state's Rules for Solid Waste Management that incorporated the federal CCR Rule (GA EPD 391-3-4-.10, i.e., the State CCR Rule). The State CCR Rule regulates all CCR units, including units not regulated by EPA's final 2015 CCR Rule. These CCR units are subject to the requirements of the State CCR Rule, which include obtaining a solid waste permit and conducting routine groundwater monitoring and reporting. The Georgia CCR Rule requires site-specific permits detailing design, operations, construction quality assurance, closure, groundwater monitoring, inspections, and post closure care with oversight and enforcement by EPD. EPD updated the state CCR Rule in March 2018 and again in February 2022 to align with relevant Federal CCR Rule revisions. Currently, EPD has not adopted the Legacy Rule. As a result, these units are dual-regulated under both the federal and state CCR rules.

In March 2017, EPD submitted Georgia's CCR Rule for EPA's review and approval as a "partial" permit program, meaning that EPD did not seek approval of certain elements of the Federal CCR Rule. In June 2019, Georgia received notice from EPA that their application was complete, officially initiating the 180-day review and approval process. In January 2020, EPA finalized a partial approval of Georgia's CCR permit program, the second of only five state approvals to-date. Georgia's program was partially approved because the Georgia Rules for Solid Waste Management (i.e., Georgia CCR Rule) did not include provisions to cover the applicability of requirements for endangered species. Georgia's partial program approval allows the EPD to enforce rules promulgated under its solid waste statute related to CCR activities, as well as to issue permits and to enforce compliance.

In February 2020, EPA issued a proposed rule to establish a Federal CCR Permit Program for states that are not actively pursuing their own state CCR permit program for approval and to cover specific rules sections that are not included in state programs with partial approval.

The finalization of the Legacy Rule subjects legacy surface impoundments to duplicative requirements and oversight by both the state and federal agencies. RCRA allows a state to update its program within three years of any applicable revision to the Federal CCR Rule in order to maintain approval. Until EPD applies for approval to regulate the Legacy Rule, the new categories of CCR units will be dually regulated by both federal and state CCR rules.

New Regulatory Updates

- None

2.2.1.1 CCR Compliance Strategy

Georgia Power's ash pond closure plans and CCR unit compliance strategy are designed to comply with both the Federal CCR Rule and the Georgia CCR Rule. The Company ceased placement of coal ash in all ash ponds in 2019, and the CCR units are in various stages of operation, construction, and closure. Under the requirement in both the federal and state rules to maintain a publicly available website of CCR compliance documents and data, the Company website includes detailed information for each CCR unit, such as permit documents, dewatering plans, groundwater monitoring data, and more.[5] Under EPA's new Legacy Rule, certain CCR units currently subject to the state rule would also become subject to the federal rule, see **Table 5**. While these units are now subject to federal regulation, the closure plans are not changing due to the state rule's comprehensive nature to regulate all CCR units. This duplicative regulation would persist until Georgia seeks and EPA approves incorporation of the Legacy Rule into the Georgia CCR Rule through the WIIN Act process.

GPC prepared and posted Applicability Reports for all legacy surface impoundments and commencement of compliance obligations in accordance with the Legacy Rule effective date, November 8, 2024. Other ongoing activities include facility evaluations and associated reporting due in 2027 and 2028.

[5] https://georgiapower.com/ccr

Table 5. Georgia Power's Legacy Surface Impoundment Applicability Reports Filed November 2024

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 EPD.
Branch	**5**	Branch AP-A, AP-B, AP-C, AP-D, and AP-E are classified as legacy surface impoundments. Branch AP-A – a Closure Certification pursuant to 40 C.F.R. § 257.100(g) was provided with the Applicability Report, 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 parcel containing AP-1 is owned by Georgia Ports Authority but operated by Georgia Power for purposes of the Legacy Impoundment rule. 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**	

Ash Pond and Landfill Closure Strategy

Georgia Power's site-specific CCR closure strategies for ash ponds and CCR landfills at 12 sites across the state are shown in **Table 6**. The closure plans are based on detailed site-specific designs performed by third party professional engineers with expertise in solid waste permitting and design. The site-specific plans consider various important factors, including the size and volume of each CCR unit, local geology and topography, detailed modeling of site stability, the availability of on-site or off-site landfill space, safety requirements, the compliance deadline, and other site-specific constraints.

Table 6. Georgia Power CCR Unit Closure Strategies

Facility	Landfills	Ash Ponds	Closure Strategy
Arkwright	AP-1 Landfill, AP-2 DAS Landfill, AP-3/Monofill Landfill		The existing landfills were closed in 2010 under Solid Waste Regulations applicable at the time. Under the Georgia CCR Rule, the existing landfills will be closed by removal. The ash from Plant Arkwright will be trucked to the permitted landfill at Plant Branch to be screened for marketable ash with future plans to process through the Plant Branch beneficial use facility.
	Future LF		The future permitted onsite landfill has been removed from the current strategy and budget in lieu of beneficial use and off-site disposal at Plant Branch.

Facility	Landfills	Ash Ponds	Closure Strategy
Bowen		AP-1	AP-1 is being closed in place by excavating and consolidating CCR into a fully composite-lined and final-covered area. Additionally, a large portion of the ash is contracted to be processed for beneficial use.
	LF		The permitted landfill is to remain active as part of ongoing plant operations and will also support ash pond closure. The landfill will undergo closure when permitted capacity is reached or when CCR disposal is no longer needed. This ECS includes construction of new landfill cells at Plant Bowen to support continued plant operations.
Branch		AP-A	AP-A was closed by removal and consolidated within AP-E before the Georgia CCR Rule became effective.
		AP-B, C, D, E	AP-B, C, D, & E will be closed by removal to a future permitted on-site landfill. Additionally, a large portion of the ash is contracted to be processed for beneficial use.
	Future LF		The permitted landfill is under construction and will support ash pond closures for Branch and Arkwright. The landfill will undergo closure when permitted capacity is reached or when CCR disposal is no longer needed.
Hammond		AP-1, AP-2	AP-1 and AP-2 are being closed by removal to a Company-owned off-site permitted landfill (Huffaker Road).
		AP-3	AP-3 has been closed in place with an engineered final cover system. Consistent with the post-closure plan, a TreeWell® system has been installed, in accordance with the CCR permit conditions, outside and downgradient of the CCR footprint.
		AP-4	AP-4 will be closed by removal to a Company-owned off-site permitted landfill (Huffaker Road).
	Huffaker Rd		The permitted landfill will be expanded and then closed when permitted capacity is reached or when CCR disposal is no longer needed.
Kraft		AP-1	AP-1 was closed by removal to offsite permitted landfills prior to the Georgia CCR Rule. The removal was part of an expanded plant retirement project and was regulated by EPD's Response and Remediation Program. The parcel containing AP-1 is owned by Georgia Ports Authority but operated by Georgia Power for purposes of the Legacy Impoundment Rule.
	Grumman Rd		The landfill was closed in accordance with its current landfill permit requirements. Permitting for closure under the Georgia CCR regulations is ongoing.
McDonough		AP-1	AP-1 was largely closed in place with consolidation and installation of a geosynthetic final cover system in 2017, consistent with the closure plans, the installation of a fully encompassing barrier wall is planned following final design approval through permit issuance.

Facility	Landfills	Ash Ponds	Closure Strategy
		AP-2	AP-2 has been removed and the CCR consolidated with AP-1, AP-3, and AP-4.
McDonough		AP-3 & AP-4	AP-3 and AP-4 has been consolidated and closed in place with an geosynthetic final cover system. Consistent with closure plans, closure construction includes an underslope drainage system and the continued interim use of pumping wells.
McIntosh		AP-1	AP-1 has been closed by removal with CCR placed in a permitted on-site landfill.
	LF3		The landfill was closed in accordance with the landfill permit in 2008.
	LF4		The permitted landfill is permitted to receive CCR as needed. The landfill will undergo final closure when CCR disposal is no longer needed.
McManus		AP-1	AP-1 has been closed by removal with CCR placed in an off-site permitted landfill.
Mitchell		AP-A, 1, 2	AP-A, 1, and 2 are being closed by removal with CCR transported offsite for beneficial use, with ash that does not meet beneficial use specifications placed in an off-site permitted landfill.
Scherer		AP-1	AP-1 is being closed in place. Consistent with the closure plans, the planned closure construction includes consolidation of the current ash pond footprint, with extension of the engineered final cover system to include non-CCR containing areas to minimize stormwater infiltration.
	LF		The permitted landfill to remain active as part of ongoing plant operations. The landfill will undergo closure when permitted capacity is reached or when CCR disposal is no longer needed. This ECS includes development of a new landfill cell to support continued plant operations.
Wansley		AP-1	AP-1 will be closed by removal with CCR placed in a permitted on-site landfill.
	LF		The permitted landfill will be expanded and then closed when permitted capacity is reached or when CCR disposal is no longer needed.
Yates		AP-1	CCR from AP-1 was removed from the ash pond and consolidated to R6, AP-B' and AP-3.
		AP-2	AP-2 was closed by removal to AP-B' and AP-3.
		AP-3, B'	AP-3 and AP-B' are being consolidated and will be closed in place with a geosynthetic final cover system. Consistent with the closure plans, a subsurface hydraulic conveyance system has been installed as part of the closure.
		AP-A	AP-A was closed by removal to AP-B' and AP-3.

Facility	Landfills	Ash Ponds	Closure Strategy
		AP-B	AP-B is being closed by removal to AP-B' and AP-3.
		AP-C	AP-C was previously incorporated into the on-site permitted landfill, R6.
	LF R6		The landfill is being closed in accordance with its current landfill permit requirements.
	LF Gypsum		The gypsum landfill has been closed by removal. EPD accepted the Plant Yates Gypsum Landfill Decontamination Demonstration/ Certification and released the unit from the CCR Permit.

In November 2018, Georgia Power submitted 29 CCR permit applications as required by the Georgia CCR Rule for all existing ash ponds and CCR landfills. Since 2018, Georgia Power submitted 2 additional CCR landfill permit applications to support ash pond closure projects. These permit applications outlined detailed engineering information about Georgia Power's ash pond closure and landfill operations plans and were developed with significant internal resources supported by multiple third-party engineering firms and licensed professional engineers and geologists. 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 took steps to address EPD's comments, which included working with third-party engineering firms, to update groundwater monitoring plans, revise permit documents, and update closure drawings and engineering calculations.

To date, EPD has issued a total of 19 final permits, including three closure-in-place permits, nine closure-by-removal permits, and seven landfill permits. The final closure by removal permit for Wansley AP-1 was received from EPD in 2025 and the final closure-in-place permit for McDonough AP-2, 3, 4 was received from EPD in 2026. The EPA's engagement in the permitting process and evolving interpretations, years after the original rule was established, hinder EPD's progress in issuing permits. Discussions on Georgia's CCR program are ongoing, regarding EPA's positions first expressed in the January 2022 determinations for facilities outside of Georgia and in subsequent actions related to closure performance standards, groundwater monitoring, and corrective action. With additional developments expected in 2026 related to a CCR federal permit program, CCR Legacy Rule compliance, litigation, and other EPA actions, Georgia Power remains committed to working with EPD on the issuance of the remaining CCR permits, as required by the Georgia CCR Rule.

Regardless of the timing of permit issuance, in order to advance ash pond closures and meet the closure deadlines associated with the Federal CCR Rule, Georgia CCR Rule, or agreement with the EPD, the Company must continue to proceed with work, including groundwater monitoring, detailed engineering designs, construction activities, and execute site-specific and comprehensive ash pond dewatering processes. In certain instances, specific portions of the closure plans are pending EPD review and input through the permitting process to finalize designs and/or for implementation. At

McDonough AP-1, while the closure is substantially complete in accordance with CCR Rule requirements and deadlines, EPD's review of the design of the fully encompassing barrier wall is ongoing. Recognizing that these factors are beyond the Company's control, EPD used the consent order process to provide additional time to complete the closure while finalizing permitting. In December 2022, the Company entered into a consent agreement with EPD to extend the closure timeline for McDonough AP-1, and in December 2023, EPD approved of the milestone schedule submitted by the Company in fulfillment of the consent order requirements which put forth a path to construct the barrier wall upon receipt of the final permit.

The Company has provided landfill and ash pond closure certifications and/or ash removal certifications to EPD for certain CCR Units at Plants Hammond, McDonough, McManus, McIntosh, and Yates. These certifications document important information regarding the closure activities, quality control information, and verification of compliance with the CCR rules. EPD has issued acknowledgement letters for completion of CCR removal for certain CCR Units at Plants Hammond, McManus, McDonough, McIntosh, and Yates, demonstrating the Company's compliance with the Georgia CCR Rule's closure requirements and EPD's active oversight regardless of final permit status. Additionally in late 2024, EPD released the Company from its solid waste handling permit at Plant Yates Gypsum Landfill designating the former CCR Landfill as closed.

The purpose of the Company's CCR compliance strategy process is to produce cost-effective compliance solutions that will minimize the impact on customers while achieving environmental objectives and ensuring compliance with all requirements. The multiple ongoing judicial reviews of CCR regulations introduce a significant degree of uncertainty regarding future regulatory requirements. This uncertainty complicates long-term planning, as legal interpretations and regulatory standards may shift based on court rulings. The Company remains vigilant in monitoring these developments, understanding that the outcomes may impact compliance strategies. While uncertainty remains due to administration changes, their priorities, and EPA's interpretation of the Federal CCR Rule requirements, the Company remains focused on compliance and will continue to work with the EPD to ensure safe and effective closure of all ash ponds. The Company's closure plans are safe and protective of human health and the environment. In compliance with the regulatory requirements, the closures will continue to be monitored throughout closure and for years into the future.

Dewatering and Water Treatment

The Company's dewatering process during ash pond closures involves treating the ash 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. The dewatering activities occur under the direction of independent, third-party licensed wastewater treatment plant operators throughout the duration of each closure project. Water quality monitoring data is reported monthly to EPD, and a monthly summary is also placed on Georgia Power's external website. In some cases, water treatment may continue 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. The treatment system demands are often impacted by rainfall, site-specific closure conditions, and the receiving waterbody. For these reasons, the required treatment technologies may be different at each site and may change during the closure process to support the needs of the site, which may cause labor resources, operating schedules, and associated costs to fluctuate. 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.

Groundwater Monitoring

Georgia Power actively monitors groundwater at its ash ponds and CCR landfills, reporting the results to EPD and posting 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 federal and state CCR rules, the Company performs routine sampling and reporting for the compliance parameters listed in the federal and state CCR rules. 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 required under the federal and state CCR rules, the Company has installed additional monitoring wells to further characterize groundwater quality near CCR units in ACM. As part of the ACM the Company undergoes a Remedy Selection process where a corrective measure or remedy is tested, approved, and implemented. Prior to selection of this corrective measure or remedy, the Company typically conducts additional activities that include groundwater sampling, well and piezometer installation, laboratory bench scale testing, and field pilot testing to determine if the remedy, or remedies, will be effective. Once these activities are completed, the results are provided to EPD for review. Following EPD concurrence with the proposed remedy, the Company hosts a public meeting to solicit public comments on the proposed remedy as required by the CCR Rule. After public comments are considered and final concurrence is gained from EPD, the Company implements the remedial activities. There are currently two public meetings anticipated to take place in 2026 which will include a combined meeting for Hammond AP-1 and Hammond AP-2, and a separate meeting for McManus AP-1.

Post Closure Care

Once ash pond closure is complete, post-closure care will be implemented in accordance with the federal and state CCR rules. Post-closure care will include inspecting CCR landfills and former ash ponds that are closed in place to verify continued structural integrity, maintaining the integrity and effectiveness of the final cover system, maintaining and sampling the groundwater monitoring systems, and regulatory reporting.

Beneficial Use

To minimize or offset costs related to CCR storage, landfill construction, and associated operations and maintenance ("O&M"), Georgia Power has marketed for beneficial use, over a four-year average, more than 85% of the CCR generated from plant operations.

Georgia Power's fleetwide CCR closure strategy includes evaluating opportunities to recycle ponded ash during closures as viable opportunities arise and technology and markets develop. The Company intends to maximize the benefits of beneficial use by engaging in R&D (as discussed in Appendix C with the Ash Beneficial Use Center), leveraging geographical market opportunities, and using the competitive bidding process. The Company will continue to seek out beneficial use opportunities during ash pond closures where it adds value for the Company and our customers and will continue working with EPD to obtain permit modifications in the future needed to support beneficial use.

One example of the Company's ability to leverage geographical market opportunities includes the beneficial use plans at Plant Mitchell. Plant Mitchell is located in South Georgia, in proximity to portland cement and concrete processing facilities, which are located primarily in Florida. As coal ash can be used as raw feed in portland cement production, this proximity is advantageous to the cost effectiveness of the beneficial use project to remove the stored coal ash at Plant Mitchell's three ash ponds. Over the next several years, Georgia Power anticipates that up to approximately two million tons of coal ash are planned to be removed from the site for use in portland cement production, reducing the amount of ash required to be removed and relocated to an off-site landfill and ultimately serving to produce a valuable product. As of the end of 2025, approximately 1.1M tons of the material onsite has been sent for beneficial use.

In June 2022, Georgia Power announced the beneficial use project at Plant Bowen, where investments have been made to construct an ash processing facility to excavate up to nine million tons of coal ash over the next 15 years to generate a marketable ash product specifically for cement replacement in concrete. The harvested ash is being processed for beneficial use through particle size screening and drying to remove excess moisture. The processing facility at Plant Bowen began operations in first quarter 2024 and as of the end of 2025 approximately 410K tons of material has been sent for beneficial use. In May 2023, Georgia Power finalized an agreement for the beneficial use project at Plant Branch, where investments are being made to build a processing facility with plans to excavate up to eight million tons of coal ash over the next 15 years for use in concrete. The harvested ash will be processed through particle screening, drying, and thermal beneficiation, which creates a more marketable ash product by using heat to reduce the remaining carbon in the CCR material. Additional progress updates are provided in the Company's Semi-Annual Report in Docket No. 43083.

The CCR ARO compliance program is long term in nature with the possibility for changing market conditions, technology advancements, impacts from increased power generation from coal burning facilities, and many other factors over the coming decades. The Company will continue to monitor progress with its current beneficial use plans, consider additional beneficial use opportunities as

appropriate in the future, and will evaluate future revisions to the CCR rules and CCR permit developments for any impact to beneficial use projects.

2.3 Air Regulatory and Strategy Updates

The air compliance strategy considers a variety of regulations related to air quality and emissions, including both federal and state requirements. Based on the information currently available, the strategy to meet air compliance requirements is summarized in **Table 7**. The areas of legislation, regulation, permitting, or other actions that set, or are anticipated to set, critical air compliance requirements are discussed below.

Table 7. Emissions Control Equipment at Coal, Natural Gas Combined-Cycle, and New Combustion Turbine Units

Unit	Primary Fuel	NO_x Control	SO_2/Acid Gas Control	Mercury Control	PM Control	CO/VOC Control
Bowen 1 & 2	Coal	LNCS/SCR	Scrubber	ACI/ALK/MRCS FGD/SCR	ESP/FGD	N/A
Bowen 3 & 4	Coal	LNCS/SCR	Scrubber	ACI/ALK/BH FGD/SCR	ESP/BH/FGD	N/A
Bowen 7 & 8	Natural Gas	LNCS/SCR	N/A	N/A	N/A	OC
Gaston 1 – 4	Natural Gas	LNCS	N/A	N/A	N/A	N/A
McDonough 4 – 6	Natural Gas	LNCS/SCR	N/A	N/A	N/A	OC
McIntosh 10 – 12	Natural Gas	LNCS/SCR	N/A	N/A	N/A	OC
Scherer 1 – 3	Coal	LNCS/SCR	Scrubber	BH/ACI	ESP/BH/FGD	N/A
Wansley 10 & 11	Natural Gas	LNCS/SCR	N/A	N/A	N/A	OC
Yates 6 & 7	Natural Gas	LNCS	N/A	N/A	N/A	OC
Yates 8 – 10	Natural Gas	LNCS/SCR	N/A	N/A	N/A	OC

Control Equipment Key:

BH = Baghouse
ESP = Electrostatic Precipitator
OC = Oxidation Catalyst
ACI = Activated Carbon Injection
LNCS = Low NO_x Combustion System
SCR = Selective Catalytic Reduction
ALK = Alkali Sorbent Injection
MRCS = Mercury Re-emission Control

2.3.1 National Ambient Air Quality Standards and Georgia Regulations

The CAA of 1970 centralized the authority to set National Ambient Air Quality Standards ("NAAQS") and requires EPA to review the primary and secondary NAAQS every five years and revise them as necessary. Primary standards are designed to protect the health of 'sensitive' populations such as asthmatics, children, and the elderly, while secondary standards are concerned with protecting the environment, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. These reviews have resulted in multiple, significant changes to the ozone and PM NAAQS, the addition of short-term primary SO_2 and NO_2 NAAQS, and other air quality standards updates. Implementing these standards is generally a state responsibility; however, EPA has also issued rules, such as the NO_x Budget Trading Program, the Clean Air Interstate Rule ("CAIR"), and the Cross State Air Pollution Rule ("CSAPR") programs, that deal with the transport of pollutants on a regional or multi-state scale to facilitate attainment with the NAAQS.

Ozone (40 CFR 50.10)

In 1979, EPA put into place an air quality standard on 1-hour ozone concentrations of 120 parts per billion ("ppb"). Subsequently, EPA replaced the 1-hour standard with an 8-hour standard of 80 ppb in 1997, which was lowered to 75 ppb in 2008 and again to 70 ppb in 2015. In December 2020, EPA issued a final rule to retain the current standards for ozone, both primary and secondary, without revision based on EPA's review of the air quality criteria and the NAAQS.

For each historical ozone standard, portions of the Atlanta metropolitan area were designated as nonattainment during implementation before meeting the standard, as measured by air quality monitors, over a period of time. Georgia's implementation of past ozone standards included the establishment of more stringent emissions limits and requirements for various types of sources in specific counties in and around the Atlanta area. For electric generating units, affected sources include stationary engines, combustion turbines ("CTs"), and utility boilers. For example, Georgia Rule 391-3-1-.02(2)(jjj) ("Rule (jjj)"), NO_x Emissions from Electric Utility Steam Generating Units required the installation of low NO_x combustion technology at various coal-fired units and selective catalytic reduction ("SCR") systems at select coal-fired units at Plants Bowen, Hammond, and Wansley in the early 2000s.

For the current 2015 standard, all areas in Alabama and Georgia, except the Atlanta area, were designated as in attainment with the current standards. The Atlanta area subsequently met the standards in 2020, and EPA finalized the official redesignation of Atlanta to attainment with the 2015 ozone standard in October 2022, bringing the entire state of Georgia into attainment with all air quality standards. As a result, on May 23, 2023, EPD finalized revisions to the Georgia rules which removed non-attainment requirements for air permitting in all former nonattainment areas.

In the meantime, in response to President Biden's Executive Order 13990 in 2021 requiring the review of regulations finalized during the previous Administration, EPA began reconsidering the 2020 decision to retain the ozone standard, but in 2022, the EPA staff and the Clean Air Scientific Advisory Committee ("CASAC") Ozone Review Panel released conflicting recommendations on the review of the ozone standard. Following additional assessments from both EPA staff and CASAC, the EPA

Administrator published a letter on August 18, 2023, indicating EPA would stop the reconsideration of the 2020 ozone NAAQS and will instead begin its next statutory review of the ozone NAAQS.

New Regulatory Updates

In 2024, EPA released an Integrated Review Plan addressing the five-year statutory review process due in December 2025. EPA placed the review of the ozone NAAQS on the agency's expected schedule for after Fall 2026.

On December 18, 2025, EPD issued its 2024 annual ambient air monitoring report. This report showed the 2022-2024 design value of 72 ppb for the Atlanta area exceeds the 70 ppb standard. In the 2022 redesignation request, EPD included contingency measures in the event of an exceedance of the standard. All of Georgia remains designated as in attainment with the 2015 8-hour ozone standard.

Particulate Matter (40 CFR 50.13)

While national air quality standards for PM were first established in 1971, EPA shifted its focus and revised the PM NAAQS to add fine particulate matter, i.e., particles with a diameter of less than 2.5 microns ("$PM_{2.5}$"), in 1997, focusing on particles of a smaller size. The first $PM_{2.5}$ standards were set at a level of 15 micrograms per cubic meter ("$\mu g/m^3$") on an annual average and 65 $\mu g/m^3$ on a 24-hour average. In September 2006, EPA retained the annual standard but lowered the 24-hour standard from 65 $\mu g/m^3$ to 35 $\mu g/m^3$. In December 2012, EPA lowered the annual standard for $PM_{2.5}$ to 12 $\mu g/m^3$. In December 2020, EPA published a final rule to retain the particulate matter NAAQS last updated in 2012, without revision. EPA later announced that it would reconsider the December 2020 decision to retain the primary and secondary NAAQS for PM.

While the Atlanta, Floyd County, Macon, and Chattanooga areas were designated as nonattainment for the 1997 $PM_{2.5}$ annual standard, all areas in Georgia have since been redesignated to attainment for the 1997 $PM_{2.5}$ annual standard and also met the 2006 and 2012 revised PM standards.

On March 6, 2024, EPA published the final primary annual $PM_{2.5}$ standard at 9.0 $\mu g/m^3$, while retaining the existing levels of all other particulate standards. EPA is required to designate areas that are not meeting the standard as nonattainment areas within two years. EPA is also expected to issue additional rulemaking and guidance to states related to the implementation for requirements of the $PM_{2.5}$ standard over the next few years. Immediately after the rule was published on March 6, 2024, a 24-state coalition (including Georgia and Alabama), as well as other petitioners, filed petitions for review of EPA's final PM NAAQS revision rule in the U.S. Court of Appeals for the D.C. Circuit.

New Regulatory Updates

On December 16, 2024, the U.S. Court of Appeals for the D.C. Circuit heard oral arguments on the merits of the case to review the revised $PM_{2.5}$ standard.

On March 12, 2025, EPA announced it is revisiting the 2024 $PM_{2.5}$ NAAQS and that it will soon release guidance to increase flexibility on NAAQS implementation.

On February 7, 2025, EPD recommended EPA designate every county in Georgia as in attainment/unclassifiable with the revised $PM_{2.5}$ standard. Notwithstanding any changes to the final rule based on the announced revisitation or a D.C. Circuit Court decision, EPA is required to complete its designations by February 2026.

The 2024 $PM_{2.5}$ NAAQS litigation is currently being held in abeyance. On September 4, 2025, the U.S. Court of Appeals for the D.C. Circuit granted EPA's most recent request to continue to hold the litigation in abeyance until October 19, 2025, pending EPA's reconsideration of the final rule.

On November 24, 2025, EPA filed a motion in the U.S. Court of Appeals for the D.C. Circuit to vacate the revised $PM_{2.5}$ standard. Neither party in the case has requested new oral arguments, and EPA requested a decision ahead of the February 2026 designation deadline. This litigation is ongoing and EPA has not issued its designations at the time of this filing.

Startup, Shutdown, Malfunction (CAA Section 110(k)(5), 40 CFR 52, GA Rule 391-3-1-.02(2)(a)7. and 11.)

In May 2015, EPA issued a final "State Implementation Plan ("SIP") Call" requiring 36 states, including Georgia, to remove exemptions for excess emissions that occur during periods of startup, shutdown, and malfunction ("SSM") in previously approved state rules. Georgia Power and the State of Georgia were parties to litigation in the D.C. Circuit Court challenging the 2015 SSM Rule on the basis that the long-standing Georgia excess emissions rules have supported and not interfered with significant air quality improvements in the area. The litigation was subsequently placed on hold pending additional EPA rulemaking.

In November 2016, EPD submitted a new state SSM rule (391-3-1-.02(2)(a)(11)) to EPA for approval as a revision to the Georgia SIP, setting requirements for work practice standards for periods of startup, shutdown, and malfunction.

In December 2021, the D.C. Circuit Court reactivated the SSM SIP Call litigation at the request of EPA. In November 2022, EPA proposed to disapprove of the Georgia SSM SIP that was submitted in November 2016 on the basis that the work practice standards in Georgia's rule did not satisfy CAA requirements.

On January 10, 2023, the November 2016 SSM SIP was withdrawn and intentions to revise the state rule and resubmit were stated. On August 22, 2023, the Georgia Department of Natural Resources ("DNR") approved of a new state SSM rule to replace the submission that EPA had proposed to disapprove.

On March 1, 2024, the U.S. Court of Appeals for the D.C. Circuit issued a decision in the 2015 SSM SIP Call litigation. In a split decision, the court vacated the majority of EPA's 2015 SSM SIP Call issued to 36 states (including Georgia), finding that EPA did not provide a sufficient basis to recall states rules with automatic exemptions, including complete affirmative defenses, or to state director's discretion provisions. As a result, on June 24, 2024, EPD formally withdrew its request for EPA to review and approve the new state SSM rule as part of the SIP.

New Regulatory Updates

In June 2025, the Georgia DNR Board approved a final rule removing the requirement for facilities to request AELs for periods of SSM where an emissions limit cannot be met. This action effectively reverts SSM requirements back to those in place prior to the 2015 SIP call.

Georgia Multipollutant Rule and SO_2 Emissions Rule (GA Rule 391-3-1-.02(2)(sss) and (uuu))

In response to federal environmental rules, as well as state-specific objectives, Georgia implemented a set of state rules requiring installation of emission controls and setting emission standards for coal-fired power plants.

EPD targeted emissions reductions for a broad set of air quality objectives with the Georgia Multipollutant Rule, which was finalized in June 2007. The Georgia Multipollutant Rule was designed to reduce emissions of mercury, SO_2, and NO_x statewide by requiring installation of specified control technologies on all of the larger coal-fired EGUs by specific dates, originally set between December 31, 2008, and June 1, 2015. Specified controls included flue gas desulfurization scrubbers, SCRs, and baghouses.

The Georgia SO_2 Emissions Rule, finalized in January 2009, was designed to be a companion rule to the Georgia Multipollutant Rule. The rule requires reduction of SO_2 emissions by 95% from all units required to install scrubbers under the Georgia Multipollutant Rule, except Plant Yates Unit 1 where a 90% reduction was required. The rule required compliance beginning in January 2010 for units with scrubbers in operation and requires reductions from the remaining units at dates aligning with or close to the Multipollutant Rule compliance dates.

The most recent revisions to both the Georgia Multipollutant Rule and Georgia SO_2 Emissions Rule were finalized in June 2011 and April 2013. These revisions moved up the scrubber and SCR compliance dates for certain units and allowed for additional time to install controls at other units, in an attempt to streamline the compliance deadlines in the state rules with the 2012 MATS Rule deadline of April 2015. The revision also provided the option for Plant Yates units to switch to natural gas instead of installing scrubbers and SCRs.

On December 22, 2023, EPD submitted to the DNR Board a "Technology and Mercury Impact Review – Periodic Evaluation" report in accordance with Georgia Multipollutant Rule. Based on controls already imposed by EPD and implementation of EPA's 2012 MATS Rule, EPD did not recommend any change to the Georgia Multipollutant Rule or additional regulations.

2.3.1.1 NAAQS and Georgia Regulations Compliance Strategy

Georgia Power's compliance strategy for NAAQS, SSM, and Georgia-specific requirements includes continued compliance with Georgia Rule (jjj), the Georgia Multipollutant Rule, the SO_2 Emissions Rule, and continued diligence and operations of control equipment and minimizing emissions to meet SSM requirements.

With the recent lowering of the $PM_{2.5}$ NAAQS and possible future changes to the ozone NAAQS area, new areas within Georgia and Alabama may become nonattainment in the future. This potential change may result in more stringent emissions and/or permitting requirements. However, because the Georgia Power generating fleet is well-controlled for the relevant emissions, lower air quality standards are unlikely to result in the addition of new emission controls at existing facilities but could result in additional capital investment and expenses associated with operating existing emission controls. New units recently approved by the Commission at Plants Bowen, McIntosh, Wansley, and Yates were designed with emissions controls described in Table 7. Air quality modeling conducted as part of the permitting process demonstrated these projects do not violate the NAAQS.

The Company will continue to monitor developments in SSM, NAAQS, and other related state rules to determine any impacts to the environmental compliance strategy.

2.3.2 SO_2 and NO_x Emissions Allowance Programs

Congress or the EPA may use market-based programs to drive emission reductions over multi-state regions. These are typically used in instances where regional, rather than local, factors drive air quality impacts, such as acid rain or secondary formation of air pollution after direct emissions may have traveled over long distances.

Acid Rain Program (40 CFR 72 through 78)

Authorized by the 1990 Clean Air Act Amendments, the Acid Rain Program sets a cap on SO_2 emissions from power plants by allocating a fixed number of allowances to each unit subject to the program. At the end of each year, a unit must surrender allowances in an amount equal to the number of tons of SO_2 emitted. Unused allowances may be sold to offset the cost of compliance or saved, i.e., banked, for future use. Initial allowance allocations were received in 1995 when Phase I of the program began. When Phase II began in 2000, the number of allowances available was reduced to limit SO_2 emissions to 50% below 1980 levels by 2010. The regulations also set emission rate limitations on NO_x emissions from coal units, which can be met by individual units or by a group of units under an averaging plan.

Ozone or $PM_{2.5}$ Interstate Transport Rules (40 CFR 96 and 97)

Since emissions to the air may, under certain conditions, travel over long distances, the CAA requires states to not only address nonattainment of air quality standards within its own borders but also requires states to develop interstate plans to address any out-of-state air quality issues to which they contribute. In July 2011, EPA released the final Cross State Air Pollution Rule ("CSAPR")rule, which applies to 27 states, including Georgia and Alabama. This rule established annual allowance trading programs for SO_2 and NO_x to reduce transport of fine PM under the 1997 NAAQS and included a separate ozone season NO_x allowance trading program to reduce ground-level ozone under the 1997 standard. CSAPR only allows for limited interstate trading resulting in a restricted allowance market, which has been updated in subsequent rulemakings in 2016 & 2020 to become more restrictive for ozone season NO_x allowances.

Since 2021 in response to a consent decree with several environmental groups, EPA has taken actions related to the 2015 ozone NAAQS and associated SIP submissions addressing interstate pollution transport, including the SIPs for Alabama and Georgia. In December 2021, EPA issued a final rule approving interstate transport provisions for the 2015 8-Hour ozone standard for Georgia, resolving the need to address interstate transport emissions from the state.

In February 2023, EPA published a final rule to disapprove 19 remaining interstate transport SIPs for the 2015 ozone NAAQS, including Alabama, which was followed by the agency's June 2023 Federal Implementation Plan ("FIP"), called the Good Neighbor Plan, to effectively revise CSAPR and require reductions in ozone season NO_x emissions from sources in 26 states. Alabama was proposed to be moved to a more stringent ozone season NO_x trading group starting in May 2023, which tends to have much higher allowance market prices.

In April 2023, the State of Alabama, Alabama Power, and PowerSouth Energy Cooperative challenged the EPA's disapproval of the Alabama SIP in the U.S. Court of Appeals for the Eleventh Circuit. EPA's disapproval of the Alabama SIP was subsequently stayed in August 2023, pending appeal. The Alabama SIP disapproval case is fully briefed, and oral argument was held in September 2024. The Alabama SIP disapproval case is being held in abeyance in the Eleventh Circuit, pending EPA reconsideration. On August 4, 2023, the State of Alabama, Alabama Power, and PowerSouth Energy Cooperative challenged the FIP for Alabama in the U.S. Court of Appeals for the Eleventh Circuit. The FIP case is being held in abeyance pending resolution of the Alabama SIP disapproval case.

Pending this litigation, interim final rules from July and September 2023 maintain the currently applicable trading programs and stay the implementation of the FIPs for states with judicially stayed SIP disapprovals, including Alabama.

On June 27, 2024, the U.S. Supreme Court stayed the 2015 Ozone NAAQS Good Neighbor FIP nationwide.

New Regulatory Updates

- On March 12, 2025, the EPA announced its intent to reconsider the 2015 Ozone NAAQS Good Neighbor FIP and to work with states on SIPs.
- On April 14, 2025, the U.S. Court of Appeals for the D.C. Circuit granted the EPA's motion to continue to hold the FIP litigation in abeyance.
- On June 18, 2025, the U.S. Supreme Court issued an opinion confirming that the proper venues for reviewing interstate transport SIP disapprovals are regional appellate courts, instead of the D.C. Circuit.
- On January 30, 2026, EPA published a proposed Phase 1 rule for the 2-phase reconsideration process of the 2015 Ozone NAAQS Good Neighbor Plan, proposing to approve the interstate transport SIPs for eight states, including Alabama.
- On February 4, 2026, the D.C. Circuit partially granted the EPA's most recent motion to continue to hold the litigation in abeyance, staying the case until April 30, 2026.

2.3.2.1 NO_x and SO_2 Emissions Allowance Programs Compliance Strategy

Georgia Power's Acid Rain Program compliance strategy initially relied heavily upon use of low-sulfur coal. However, the strategy transitioned to rely on scrubbers for SO_2 control at coal-fired steam units and through firing natural gas and low sulfur content fuel oil at combined-cycle, CT, and other steam units, which also serves as the CSAPR SO_2 compliance strategy. For purposes of both Acid Rain and CSAPR compliance, Georgia Power currently expects to continue to utilize its SO_2 annual allowance allocations and banked allowances, as needed, to maintain compliance. Under current regulations for the Acid Rain Program and CSAPR, projections show that no Georgia Power allowance purchases will be required in the future absent a change in legislation and regulation.

The Georgia Power compliance strategy for the Acid Rain Program for NO_x historically consisted of installing low-NO_x burners and/or overfire air ("OFA") systems at coal units and use of the NO_x Averaging Plan across the Southern Company coal generation fleet. However, after the retirement of all remaining coal units without SCR in 2019, use of the NOx Averaging Plan was no longer necessary. Therefore, in September of 2019, the Company terminated the NO_x Averaging Plan effective January 1, 2020. Affected units covered by the regulation now demonstrate ongoing compliance through individual Acid Rain Program limits.

The compliance strategy for the CSAPR NOx programs relies on SCRs and low NO_x burners for NO_x control. For purposes of CSAPR NOx compliance, Georgia Power currently expects to continue to utilize its annual and ozone season allowance allocations and banked allowances, if needed, to maintain compliance. Under current regulations for the CSAPR NO_x trading programs, projections show that no Georgia Power allowance purchases will be required in the future absent a change in CSAPR legislation and regulation. The Company is monitoring the litigation related to the final Good Neighbor Plan. EPA has proposed to approve the Alabama ozone interstate transport SIP. If finalized, Plant Gaston Units 1-4 will not be affected by more stringent allowance allocations for the 2015 Ozone NAAQS.

2.3.3 Maximum Achievable Control Technology Regulations

The CAA requires regulation of listed Hazardous Air Pollutants ("HAPs") and requires implementation of emission limits equivalent to the Maximum Achievable Control Technology ("MACT") for specific source categories, as determined by EPA. The standards that may apply to power generation units typically include MATS, the Combustion Turbine MACT ("CT MACT"), and the Industrial Boiler MACT. Georgia Power owns and operates EGUs that are subject to MATS and CT MACT but currently does not own biomass-fired EGUs that would be subject to the Industrial Boiler MACT.

MATS (40 CFR 63 Subpart UUUUU)

EPA's MATS Rule, finalized in April 2012, is a technology-based rule that regulates mercury, acid gases and certain metal emissions from coal- and oil-fired EGUs. MATS establishes stringent emission limits for hazardous air pollutants in the form of mercury, hydrogen chlorine ("HCl") or SO_2, and filterable particulate matter ("fPM") or metals. The compliance deadline for existing sources was

April 16, 2015, with the possibility of extensions granted on a case-by-case basis. Various Georgia Power units were granted one-year extensions to install controls or complete necessary transmission work to comply.

As a result of legal challenges and court decisions, EPA continued to issue rulemakings related to the MATS rule even after the compliance dates had passed. Some of the MATS rulemakings considered the foundational legal basis of the MATS rule. Although rules in 2016 ("Supplemental Finding") and 2020 ("Reconsideration of Supplemental Finding") came to diverging conclusions on that legal basis, EPA ultimately decided to leave the standards in place in both cases. As a part of the 2020 rulemaking, EPA also finalized the Residual Risk and Technology Review ("RTR") for the MATS rule, which is required by the Clean Air Act Amendments of 1990 on a periodic basis. EPA concluded in the RTR that the remaining risk did not warrant additional standards, and a technology review did not identify any new control technologies that would further reduce emissions beyond the original standard. This rule was challenged in the D.C. Circuit Court and was subsequently included in the list of regulations the Biden Administration directed EPA to review via executive order in 2021.

In February 2022, EPA proposed to revoke the Reconsideration of Supplemental Finding that was finalized in 2020, effectively reverting to the 2016 Supplemental Finding for the legal basis of the MATS rule.

On March 6, 2023, EPA finalized the revocation of the Reconsideration of Supplemental Finding but made no changes to the emission standards or compliance requirements in the MATS rule.

On April 24, 2023, EPA proposed to update the MATS requirements with the MATS Residual Risk and Technology Review rule.

On July 7, 2023, the D.C. Circuit Court agreed to voluntarily dismiss litigation related to both the 2016 and 2020 rulemakings at the request of all parties involved in the cases.

On May 7, 2024, EPA published the final MATS RTR. This rule affects coal and oil-fired steam EGUs (does not include CTs or CCs). EPA finalized a more stringent standard for emissions of fPM, lowering the standard from 0.030 lb/MMBtu to 0.010 lb/MMBtu. The rule requires facilities use PM CEMS to demonstrate compliance with the new fPM emission standard. The compliance deadline for the new requirements is July 6, 2027.

Immediately after the MATS rule was published, industry groups, electric generators, and a 23-state coalition (including Georgia) filed a challenge to the MATS Rule in the U.S. Court of Appeals for the D.C. Circuit.

Seven motions to stay the rule were filed by petitioners, including the coalition of states. On August 6, 2024, the U.S. Court of Appeals for the D.C. Circuit denied motions to stay. After the D.C. Circuit denied the stay motions, the seven groups of petitioners subsequently filed emergency stay applications with the U.S. Supreme Court. On October 4, 2024, the U.S. Supreme Court denied the emergency stay applications.

New Regulatory Updates

- On February 13, 2025, and May 21, 2025, the U.S. Court of Appeals for the D.C. Circuit granted EPA's motions requesting an abeyance and then a continuing abeyance, respectively, of the litigation over the 2024 MATS RTR. In the request for abeyance, EPA indicated that it planned to reconsider the 2024 final rule.
- On March 12, 2025, the EPA announced it would reconsider the 2024 MATS RTR. The fact sheet associated with the reconsideration encouraged utilities with affected units to apply for a Presidential Exemption by March 31, 2025. The Presidential Exemption would delay compliance with the 2024 MATS RTR from July 6, 2027 to July 6, 2029. The Company applied for a Presidential exemption to delay compliance with the 2024 MATS RTR for Plants Bowen and Scherer on March 31, 2025, due to technical challenges with the required monitoring method.
- On April 8, 2025, President Trump signed a Proclamation entitled "Regulatory Relief for Certain Stationary Sources to Promote American Energy", granting 2-year compliance extensions to utilities that requested Presidential Exemptions on or before the March 31, 2025 deadline. Plants Bowen and Scherer were granted extensions in the Proclamation.
- On June 12, 2025, environmental groups filed complaints in the U.S. District Court for the District of Columbia and the D.C. Circuit Court against President Trump, EPA, and EPA Administrator Lee Zeldin challenging the April 8 proclamation granting two-year extensions for compliance for numerous power plants. On September 3, 2025 and October 16, 2025, the courts granted EPA's request to hold challenges in abeyance until March 3, 2026 and pending EPA's reconsideration of the 2024 MATS Rule, respectively.
- On June 17, 2025, EPA published a proposal to repeal the requirements from the 2024 MATS Rule, including the revised fPM standard and requirement to install PM CEMS
- On February 24, 2026, the final MATS repeal was published with an effective date of April 27, 2026.

Combustion Turbine Maximum Achievable Control Technology (40 CFR 63 Subpart YYYY)

Simple cycle and combined cycle CTs can also be subject to HAPs emission standards and requirements. In March 2004, EPA issued a final CT MACT rule, setting standards for formaldehyde from new gas and oil-fired CTs. In August 2004, EPA issued a stay for new sources for gas-fired turbine subcategories of the rule because of ongoing deliberation about whether gas-fired units should be regulated by this rule. EPA took this action to avoid unwarranted expenditures on the installation of emission controls if these gas-fired subcategories were delisted.

In March 2020, EPA finalized the RTR for CTs, leaving the existing CT MACT standards largely unchanged. In the final rule, EPA determined that the risks from this source category of emissions are acceptable and that the existing National Emission Standards for Hazardous Air Pollutants ("NESHAP") provides an ample margin of safety to protect public health. EPA also determined that no new cost-effective controls under the technology review would achieve further emissions reductions from the source category. With the RTR, the stay of the standards for new gas-fired turbines remained in place.

In August 2020, EPA granted a petition for reconsideration of the final CT MACT RTR, stating that it intended to address the stay of the emission standards for new gas-fired turbines and the lack of standards for certain HAPs not currently covered by the rule. In March 2022, EPA lifted the stay on CT MACT standards and requirements for CTs that began construction after the 2003 applicability date defined in the original rule. Although the stay had been in place since 2004, sources were subject to the rule immediately, which set requirements to comply with formaldehyde emission standards and other requirements.

In April 2022, EPA issued an Information Collection Request ("ICR") under Section 114 of the Clean Air Act to Georgia Power and other entities to collect data in preparation for the CT MACT RTR reconsideration. The ICR created a one-time compliance obligation for sources to provide this data and was due back to EPA in January 2023. Originally, EPA asked Georgia Power to complete a questionnaire and perform extensive emissions testing at as many as 15 CT units. After Georgia Power informed EPA of the potential winter reliability concerns and cost impact to customers, EPA agreed to reduce the scope of the ICR to two simple cycle CTs (Plant McIntosh CT1 and CT2) on both oil and natural gas and two combined cycle CTs (Plant McDonough CT4A and CT4B) on natural gas.

In January 2023, Georgia Power and other companies submitted facility information and emissions testing results to EPA in response to the ICR issued in April 2022.

New Regulatory Updates

- According to EPA's Unified Agenda released in September 2025, the CT MACT RTR reconsideration has shifted to the long-term agenda. A proposed rule would, at earliest, be published in or after Fall 2026.

2.3.3.1 MACT Compliance Strategy

Georgia Power's compliance strategy for MATS leveraged the Company's research and testing program to make individualized, targeted decisions for each unit that optimizes the available technology while minimizing costs to the customer. While the existing scrubbers at Plant Bowen were able to achieve compliance with the acid gas or SO_2 emission requirements, additional controls were necessary to comply with mercury and metals or PM limits on a continuous basis. Therefore, Georgia Power installed activated carbon and alkali sorbent (e.g., hydrated lime) injections systems on all units at Plant Bowen by the compliance deadline of April 2016. In addition, to minimize operational costs associated with the injection systems, Mercury Re-emission Control Systems ("MRCSs") were also installed at Plant Bowen Units 1-2 to prevent re-emission of mercury once it is captured in the scrubber. To ensure compliance with the MATS particulate matter limits, optimization of the existing electrostatic precipitators ("ESPs") was performed at Plant Bowen Units 1-2, while baghouse retrofits were necessary at Plant Bowen Units 3-4 to capture additional particulate in the flue gases in order to comply. In addition, the Company performed plant-specific optimization projects at Plant Bowen on the existing scrubbers to minimize potential impacts to reliability and on balance of plant equipment to ensure reliability of mercury, acid gas, and particulate matter controls as a part of the MATS compliance strategy.

For the subbituminous coal-fired units at Plant Scherer, existing controls installed to comply with the Georgia Multipollutant Rule (i.e., scrubber, SCR, and baghouse with activated carbon injection ("ACI")) are used to comply with the MATS limits. Plant Yates Units 6 and 7 and Plant Gaston Units 1-4 switched to natural gas as the primary fuel. By switching to natural gas, these units are no longer subject to MATS because MATS applies only to coal- and oil-fired units. Georgia Power determined that use of natural gas at these plants is the most economic choice for customers and is feasible both from a boiler technology as well as a natural gas fuel supply perspective.

The Company no longer needs to install PM monitors on Bowen Units 1-4 and Scherer Units 1-4 as part of the compliance strategy because the 2024 MATS RTR has been repealed. The Company intends to continue evaluating the technical challenges, performance, and cost of PM monitors should this technology be required in a future rulemaking.

For CT MACT, the lifting of the stay on requirements for natural gas-fired units affected Plants McDonough and McIntosh combined-cycle units. However, all of the affected units were constructed with oxidation catalysts, which are considered state-of-the-art controls for formaldehyde. Thus, the units are able to comply with only minor updates to monitoring equipment and increased testing, reporting, and recordkeeping obligations. Plant Yates Units 8-10 simple-cycle CTs and the recently certified combined cycles at Plants Bowen, Wansley, and McIntosh will also include installation and operation of oxidation catalysts and are designed to comply with the CT MACT requirements. The Company will monitor developments on the CT MACT rule following the submittal of the ICR information and will refine or update the strategy as needed through the ECS process.

In recent years, EPA promulgated rulemaking known as Major MACT to Area ("MM2A"), which codified Trump-era guidance that major sources of HAP could reclassify as an area source after taking steps to lower HAP emissions below the major source threshold. The final rule was published in the Federal Register on November 19, 2020. On September 10, 2024, U.S. EPA finalized additional requirements that certain source categories retain NESHAP standards even if reclassifying to an area source. These 2024 requirements were repealed on June 20, 2025, through a Congressional Review Act resolution passed by Congress and signed into law by the President. The Company will reevaluate area source reclassification for applicable facilities as part of future compliance strategies.

2.3.4 Regional Haze Regulations (40 CFR 51.308)

The Regional Haze Rule was finalized in July 1999 with the goal to improve visibility conditions in specified federal Class I areas, including primarily national parks and wilderness areas, back to natural conditions by 2064. The rule requires states to develop a SIP to determine and address any SO_2 or NO_x emissions control measures necessary to make reasonable progress toward natural visibility conditions for each 10-year planning period. The first implementation period involved the application of best available retrofit technology ("BART") requirements, which was determined to be satisfied for power plants by CSAPR requirements for SO_2 and NO_x.

In January 2017, EPA finalized revisions to the second planning period under the Regional Haze Rule, which covers through 2028. These revisions included the extension of the deadline for the SIP submittal from July 2018 to July 2021 and increased requirements for state consultations with Federal Land Managers. In addition to this rulemaking, EPA has released guidance documents for Regional Haze SIP development for the second implementation period in 2016, 2019, and 2021, adjusting some elements each time.

For the Regional Haze Rule, EPD has ongoing participation in a regional planning organization for the Southeast U.S., which assessed ambient air quality data for the 2028 planning period. Based on this analysis, in July 2020, EPD selected Plant Bowen for further evaluation of SO_2 emissions to determine whether additional control measures are required to make reasonable progress toward achieving the program's goals. Georgia Power submitted the Regional Haze four-factor analysis for Plant Bowen in November 2020, recommending that no additional SO_2 emission controls were necessary. Regional Haze SIPs for the 2028 planning period were due to EPA by July 2021, which was missed by a majority of states, including Georgia.

In June 2022, EPD completed and proposed its Regional Haze SIP, allowing for a period of public comment. In the proposal, EPD concurred with the Georgia Power four-factor analysis for Plant Bowen recommendation that no additional SO_2 emission controls are necessary for compliance with Regional Haze. Georgia Power will be required to comply with the existing MATS SO_2 emission standard using the existing scrubbers at all four Plant Bowen units as a part of the SIP. In August 2022, EPD completed and submitted its Regional Haze SIP to EPA, with the requirements for Plant Bowen remaining consistent with the four-factor analysis submitted by Georgia Power.

On September 6, 2023, EPD incorporated requirements associated with its Regional Haze SIP into Plant Bowen's Title V operating permit.

On June 3, 2024, EPA published a proposal to approve Georgia's Regional Haze SIP. The final rule of this approval was published on November 21, 2024, with an effective date of December 23, 2024. The SIP submission addressed requirements for the second planning period of the Regional Haze program. Given the projected improvement in visibility conditions, EPA found that the source selection methodology was reasonable.

New Regulatory Updates

- On December 13, 2024, the EPA Administrator signed a proposal to revise deadlines in the Regional Haze Rule. The proposal would extend the due date for the next round of state implementation plans covering the Third Implementation Period from July 31, 2028, to July 31, 2031. This extension was published as a final rule on January 6, 2026.
- On March 12, 2025, EPA announced its intent to review its regulations implementing the Regional Haze Program for the third planning period to ensure that it fulfills Congressional intent, is based on current scientific information, and reflects recent improvements in air quality.
- On October 2, 2025, EPA published an advanced notice of proposed rulemaking in which they are seeking information and requesting comment to aid in developing changes related

to the restructuring of the Regional Haze Rule in order to meaningfully streamline regulatory requirements impacting states' visibility improvement obligations under the CAA.

2.3.4.1 Regional Haze Compliance Strategy

The existing scrubbers at Plant Bowen are used to comply with Regional Haze requirements. While the adoption of the existing MATS SO_2 limit at Bowen removed the flexibility to use both the HCl and SO_2 compliance options available in the MATS rule, no incremental controls or projects are required to comply. Additionally, the existing SO_2 CEMS installed on Bowen Units 1-4 are used to demonstrate compliance with the Regional Haze SIP emissions limit.

2.3.5 New Source Review and Other Air Permitting Regulations

Facilities that include activities with associated emissions may be required to obtain an air permit to authorize construction and/or operation. The most resource-intensive and stringent type of permitting is typically termed major New Source Review ("NSR"), which includes both federal and state requirements applicable to new sources or projects at existing sites that result in emissions over certain thresholds. Sources or projects that do not require major NSR may still need to obtain construction or operation authorization through a state or minor air permit.

New Source Review (40 CFR 52.21)

Major NSR is a pre-construction permitting program under the CAA that is required of new sources or can be triggered by changes to an existing emissions source that result in a "significant" increase of a regulated NSR pollutant. While the major NSR program was established by the 1977 Clean Air Act Amendments, the regulations, EPA's interpretation of the requirements, and EPA's guidance have changed over time. EPD is the approved permitting authority for Georgia. If a project triggers major NSR, applicants must submit a case-by-case analysis of control technologies and emission reductions that are feasible at a particular facility, as well as air quality modeling to ensure the project maintains air quality. As there are no areas in the state currently designated as nonattainment with air quality standards, EPD reviews and approves of the air permit application through issuance of a Prevention of Significant Deterioration ("PSD") permit.

In 1999, under a broad nationwide enforcement initiative, EPA brought a civil action in the U.S. District Court for the Northern District of Georgia against Georgia Power, alleging that the Company had violated the major NSR provisions of the CAA and related state laws at certain coal-fired generating facilities. The civil action sought penalties and injunctive relief, including an order requiring installation of the best available control technology at the affected units. The case against Georgia Power was administratively closed in 2001 and has not been reopened. On May 3, 2024, EPA published the Project Emissions Accounting Proposed Rule. This proposal's guidance asserts that states should only aggregate projects that are "substantially related." Before counting for "project emissions accounting," the proposal would also require decreases to be made enforceable. The proposal also reviews the monitoring, recordkeeping, and reporting provisions.

New Regulatory Updates

- On January 3, 2025, House Resolution 161, the New Source Review Permitting Improvement Act, was introduced. The Act proposes to amend the definition of a "modification". The proposed bill has been referred to the House Energy and Commerce Committee.
- On July 21, 2025, EPA published a withdrawal of the proposed Project Emissions Accounting Proposed Rule.
- On August 18, 2025, the Environmental Defense Fund, Environmental Integrity Project, Natural Resources Defense Council, and Sierra Club filed a Petition for Review in the United States Court of Appeals for the D.C. Circuit of EPA's withdrawal of the proposed rule.

Other Air Permitting (40 CFR 70, GA Rule 391-3-1-.03)

For projects that do not require major NSR permitting, Georgia may still require a construction or operating permit through the Title V program, which compiles all applicable air requirements for major sources, or through the minor source permitting programs, typically for smaller sources. These types of permitting actions are typically simpler and less resource intensive than NSR permitting. In the Fall of 2022, EPA conducted stakeholder engagement sessions focused on permitting that is not subject to major NSR. EPA indicated their efforts will focus on reviewing state and local agency's minor source permitting programs to verify they provide adequate protection of the NAAQS and transparency to the public.

GHG Air Permitting (40 CFR § 51.166(b)(48))

In April 2010, EPA issued a final rule regulating GHG emissions from new motor vehicles under the CAA, taking the position that this action then triggered CO_2 and other GHGs to become regulated pollutants under the NSR preconstruction permit program and the Title V operating permit program. As a result, the construction of new facilities or the major modification of existing power plants could trigger the requirement for a Prevention of Significant Deterioration ("PSD") permit and the installation of controls to reduce CO_2 and other GHGs, under the GHG Tailoring Rule, finalized in May 2010.

In June 2014, the Supreme Court ruled that EPA could not use either its PSD or Title V permitting programs to require permits solely based on GHG emissions but could require applicants that triggered permitting for other pollutants to undertake GHG analysis. In August 2015, EPA removed portions of the Title V and PSD regulations that were vacated as a result of the Supreme Court decision.

2.3.5.1 NSR and Other Air Permitting Compliance Strategy

Georgia Power reviews projects for permitting applicability, obtains permits when required, and will continue to monitor any developments on permitting regulations, policy, and guidance. Plant Yates Units 8-10 simple-cycle CTs were reviewed for air permitting applicability, and the Company determined that the project would require a PSD permit to authorize construction. The air permit application was submitted on December 8, 2023. The environmental compliance strategy for Plant Yates Units 8-10 includes SCR and oxidation catalyst technology on the dual fuel advanced class CTs in order to meet state and federal emission standards and to fulfill the case-by-case control

technology evaluation required for PSD permitting. Plant Yates is located in Coweta County, which is in the former Atlanta ozone nonattainment area, and is subject to more stringent NO_x emission standards from May through September. Although Units 8-10 will operate primarily on natural gas, the compliance strategy and control configuration provide the plant with the flexibility to operate on either natural gas or ultra low sulfur diesel fuel throughout the year, ensuring a reliable capacity resource for customers. EPD issued the final PSD permit authorizing construction of the Yates 8-10 units on June 7, 2024.

On March 5, 2025, Georgia Power submitted an air permit application to construct up to four dual-fuel CCs at Plant Bowen. The Company also submitted air permit applications to construct two CCs at Plant Wansley and up to two CCs and Plant McIntosh on June 9, 2025, and November 4, 2025, respectively. Each project exceeded the significant emissions rates requiring a PSD review. The compliance strategy for these units includes SCR and oxidation catalyst to comply with state and federal emissions standards as well as best available control technology ("BACT") limits determined during the PSD permitting process. Like Plant Yates, CCs at Plants Bowen (Bartow County) and Wansley (Heard County) are located in the former Atlanta ozone nonattainment area and are subject to additional requirements during ozone season. EPD issued the final PSD permit authorizing construction of Plant Bowen Units 7-10 on January 29, 2026. The Company expects to receive authorization from EPD to construct the units at Plants Wansley and McIntosh in 2026. The Company will seek GPSC approval and certification prior to commencing construction on any unit that EPD has authorized that the Commission has not yet certified.

2.3.6 Greenhouse Gas Emissions and Climate Policy

GHG and Renewable/Clean Energy Legislation

The U.S. Congress has considered many proposals to reduce GHG emissions and/or mandate renewable or clean energy. These proposals have taken many forms, for example: a cap-and-trade program, carbon tax, and renewable/clean energy standards.

Throughout the 116th and 117th Congresses (2019-2022), there was significant activity on climate-related legislation. Of note, several bills that were introduced focused on an economy-wide carbon tax. These proposals typically impose an initial economy-wide price on carbon (e.g., dollars per ton CO_2), with varying degrees of escalation each year until the proposal's specific national emission reduction targets are achieved. The proposals contemplate initial pricing in a range from $15/ton to $52/ton and increase annually at varying rates. Another approach to pricing carbon, a clean energy standard, has also been proposed. As an example, a clean energy standard would set clean energy targets – a percentage of generation from low to zero GHG emitting sources – for retail electricity suppliers that would increase annually to 100% by some future year.

In December 2021, Congress passed the Infrastructure Investment and Jobs Act ("IIJA"). The IIJA invests $1 trillion in the American economy, including roughly $73 billion for power infrastructure, and includes provisions related to cybersecurity and resiliency, broadband deployment, electric vehicle infrastructure deployment, CCS related infrastructure and commercialization, hydrogen infrastructure and commercialization, renewable energy and storage demonstrations, hydropower

improvements/enhancements, Low-Income Home Energy Assistance Program, the National Environmental Policy Act ("NEPA"), Minority Business Development Agency, nuclear, "Buy America," and grid infrastructure and transmission.

In August 2022, the Inflation Reduction Act ("IRA") was signed into law, providing $369 billion in funding for clean energy and climate related policies. The IRA extends, expands, and increases production and investment tax credits for clean energy projects, such as solar, wind, nuclear, hydrogen, energy storage, and carbon capture and storage. After passage of the IRA, focus on climate legislation was significantly reduced in the 118th Congress (2023-2024).

New Updates

- In the 119th Congress (2024-2025), the One Big Beautiful Bill Act ("OBBBA") was signed into law on July 4, 2025, phasing out or placing restrictions on various tax credits established under the IRA for future clean energy projects, particularly solar and wind projects.

Global Climate Change International Initiatives

International climate change negotiations under the United Nations Framework Convention on Climate Change ("UNFCCC" or "Convention") continue. Since 2005, the Convention has established various "working groups" to address key issues and negotiate future climate-related international agreements. The working groups meet periodically throughout the year and, along with the formal subsidiary bodies to the Convention, again at the annual Conference of Parties ("COP"), a Meeting of the Parties to the Kyoto Protocol ("CMP"), and a Meeting of Parties to the Paris Agreement ("CMA"). The COP is the supreme decision-making body of the Convention, which reviews the implementation of the Convention and other legal instruments. The CMP reviews the implementation of the Kyoto Protocol. The CMA oversees the implementation of the Paris Agreement, which was adopted in 2015 and establishes a universal framework for addressing GHG emissions based on nationally determined contributions ("NDC"). It also sets in place a process for increasing those commitments every five years.

The U.S. joined the Paris Agreement in 2016, withdrew in 2020, and reentered in 2021. After rejoining, President Biden subsequently announced a new country-specific commitment under the Paris Agreement for the U.S. to achieve a 50% to 52% reduction from 2005 levels in economy-wide net GHG emissions by 2030.

New Updates

- On January 27, 2025, President Trump issued Executive Order ("EO") 14162, "Putting America First in International Environmental Agreements," again directing the withdrawal of the U.S. from the Paris Agreement and, thereby, removing these national economy-wide GHG emissions targets. Pursuant to provisions in the Paris Agreement, the withdrawal was effective on January 27, 2026, one-year after notification.
- On January 7, 2026, President Trump released a presidential memo directing the heads of Executive departments and agencies to withdraw the United States from certain international organization, conventions, and treaties, including the UNFCCC and the United Nations Intergovernmental Panel on Climate Change ("IPCC").

Social Cost of Greenhouse Gas

The social cost of greenhouse gas ("SC-GHG") is a monetary estimate of the damages from climate change to society as a whole from emitting an incremental amount of GHGs. Damage estimates, which include direct and indirect impacts, have also been created for emissions of other GHGs, including methane and nitrous oxide. EPA and other agencies may use this tool to incorporate the social benefits of reductions, or the harm from emitting, GHGs into cost-benefit analysis of regulatory actions that impact cumulative global emissions. In February 2021, the Interagency Working Group on Social Cost of GHGs announced an interim SC-GHGs at $51/ton for CO_2 at a 3% discount rate, reinstituting the values that were in effect under the Obama Administration that were drastically lowered during the Trump Administration. The interim SC-GHG was subsequently challenged by groups of states in two different district courts with mixed results.

In November 2022, as part of the supplementary material released with proposed Section 111 methane regulations for the oil and gas sector, EPA released a draft report which updated estimates for the SC-GHGs, including estimates that the social cost of carbon in 2020, in 2020 dollars, is between $120 to $340 per metric ton, and the social cost of methane is $1,300 to $2,300 per metric ton, using discount rates between 2.5% to 1.5%, respectively.

On March 8, 2024, EPA published the final methane rules for the oil and gas sector. EPA also released a final version of the SC-GHG report, continuing to suggest the use of much higher values than the interim SC-GHGs.

New Regulatory Updates

- On January 20, 2025, President Trump issued EO 14154, "Unleashing American Energy," which disbanded the Interagency Working Group on SC-GHGs and withdrew any associated guidance or documentation, including the final SC-GHG report. The EO states that the calculation of the social cost of carbon "is marked by logical deficiencies, a poor basis in empirical science, politicization, and the absence of a foundation in legislation."[6]
- On March 12, 2025, EPA announced it will revisit the social cost of carbon and consider elimination of the metric from any Federal permitting or regulatory decision in accordance with Section 6 of EO 14154. New guidance was issued in consultation with the EPA on May 5, 2025, to fulfill the President's directive, significantly reducing the circumstances in which agencies need to consider SC-GHG.
- Subsequently, SC-GHG was not considered in the regulatory impact analysis ("RIA") documents released with the proposed repeals of the MATS and 111 rules for EGUs.

GHG Emissions Performance Standards

In October 2015, the EPA finalized the first GHG regulations under Section 111 of the CAA for new and existing sources in the power sector ("2015 111 GHG Rules"). For newly constructed coal and

[6] Executive Order 14154, "Unleashing American Energy," from January 20, 2025: https://www.federalregister.gov/documents/2025/01/29/2025-01956/unleashing-american-energy

gas-steam resources, EPA established a standard of 1,400 pounds of CO_2 per megawatt-hour (lbs CO_2/MW-hr) with the standard for coal based on implementation of partial carbon capture and storage. The standard for baseload combustion turbines was set at 1,000 lbs CO_2/MW-hr and based on efficiency combined-cycle technology. The final existing source rule, known as the Clean Power Plan ("CPP"), contained regulatory guidelines for GHG emissions to be used by states to develop a state-specific compliance plan. Numerous parties filed petitions for review and accompanying motions to stay the CPP, including Georgia Power. On February 9, 2016, the U.S. Supreme Court granted a stay of the CPP during the legal challenge proceedings.

On July 8, 2019, the EPA repealed the CPP and replaced it with the Affordable Clean Energy ("ACE") Rule, establishing revised guidelines for development of state-specific compliance plans to address GHG emissions from existing coal-fired power plants only. On January 19, 2021, the D.C. Circuit Court vacated and remanded the ACE Rule back to the EPA. On June 30, 2022, the U.S. Supreme Court reversed the D.C. Circuit's vacatur of the ACE Rule and issued an opinion limiting the EPA's authority to regulate GHG emissions under the CAA.

On May 23, 2023, the EPA proposed new 111 GHG Rules for new and existing sources in the power sector. While the proposal for existing sources included regulations for large combustion turbines, EPA announced on February 29, 2024, that the agency would instead take additional time to develop a more comprehensive regulatory approach for existing combustion turbines that it expects to achieve a greater level of emission reductions. A notice of proposed rulemaking is expected in early 2025 with a final rule to follow at a later date.

On May 9, 2024, the EPA finalized the 111 GHG Rules for existing coal and gas-steam resources and newly constructed combustion turbines. Similar to the CPP and ACE Rule, states are required to develop a state-specific compliance plan to implement the new GHG guidelines. For newly constructed CTs, the standards vary depending on how much a unit operates. On May 9, 2024, a 25-state coalition (including Alabama and Georgia) filed a petition for review challenging the rule in the U.S. Court of Appeals for the D.C. Circuit. Numerous other industry groups and electric generators also filed petitions for review in the D.C. Circuit, including an ad hoc litigation coalition, Electric Generators for a Sensible Transition, of which Southern Company is a member. A total of eight stay motions were filed with the D.C. Circuit, and on July 19, 2024, the court denied the petitioners' requests for a stay.

Following the D.C. Circuit's denial of the stays, a coalition of state and industry petitioners (again including Alabama and Georgia) filed emergency stay applications on July 23, 2024, with the U.S. Supreme Court.

On October 16, 2024, the U.S. Supreme Court denied petitioners' emergency stay applications. In the order denying the applications, the justices wrote that petitioners showed a strong likelihood of success on the merits, but the case was likely to be resolved in the D.C. Circuit before suffering irreparable harm.

New Regulatory Updates

- On February 19, 2025, and April 25, 2025, the U.S. Court of Appeals for the D.C. Circuit granted EPA's motions requesting an abeyance and then a continuing abeyance, respectively, of the litigation over the 2024 111 GHG Rules.
- On June 17, 2025, the EPA published a proposed rule that, if finalized, would repeal all or a portion of the 2024 111 GHG Rules. The proposed rule includes a primary proposal and an alternative proposal.
    - Under the primary proposal, EPA would repeal all GHG emissions standards promulgated under Section 111 of the Clean Air Act for fossil-fuel fired power plants, including both the 2015 and 2024 111 GHG Rules, based on a finding that these sources do not contribute significantly to global climate change.
    - Under the alternative proposal, the EPA would repeal all of the emissions guidelines for existing EGUs, as well as the 90% CCS requirement for new CTs operated over a 40% annual capacity factor, which includes both simple cycle and combined cycle CTs. New CTs would still be required to comply with the efficiency-based standards finalized in the 111 GHG Rules. These standards are a numerical (lb CO_2/MWh) limit that depends on the capacity factor and fuel mix of the individual source.
- According to EPA's Unified Agenda released in September 2025, EPA expected to issue a final rule addressing the repeal of the 2024 111 GHG Rules by December 2025. However, due to regulatory delays, subsequent action is now expected in early 2026.

2.3.6.1 GHG Climate Policy Compliance Strategy

Georgia Power continues to work with the GPSC to pursue a responsible fleet transition through a well-balanced and diversified approach that considers the critical need to supply clean, safe, reliable, and affordable electricity to customers. With a wide range of possible outcomes, the Company's scenario planning process remains the best way to capture potential financial impacts and allow for long-term planning to mitigate risks to customers. The Company will monitor and evaluate the outcome of these executive, legislative, and regulatory actions and incorporate any new information into the compliance strategy process as appropriate. GHG controls and reduction measures are another area where the Company performs industry leading R&D, as discussed in Appendix C, seeking to provide the necessary long-term cost-effective solutions for the generating fleet.

2.3.6.2 GHG Emissions Standard Compliance Strategy

While the proposed repeal rulemaking and litigation in abeyance for the 2024 111 GHG Rules creates significant uncertainty, Georgia Power continues to thoughtfully develop compliance strategies until the rules are repealed. This uncertainty comes at a time when the Company is experiencing significant load growth, which drives the need for existing fossil fuel-fired units to operate beyond 2032 to meet growing customer demand. The following paragraphs outline the Company's compliance strategies for new CTs and CCs (Yates Units 8-10, Bowen 7-8, McIntosh 12, and Wansley 10-11) and existing fossil fuel-fired generating units (Yates Units 6-7, Bowen Units 1-4, Scherer Units 1-3, and Gaston Units 1-4), should the 111 GHG Rules remain in effect.

The 2024 111 GHG Rules include the following standards for new CTs and CCs, which vary based on how much each unit operates:

- Capacity factor less than 20% - burn only natural gas and distillate oil;
- Capacity factor greater than 20% but less than 40% - comply with an emission standard that ranges from 1,170 to 1,560 lbs CO_2/MW-hr depending on how much distillate oil is burned; and
- Capacity factor greater than 40% - comply with an emission standard that ranges from 800 to 1,067 lbs CO_2/MW-hr depending on how much distillate oil is burned until 2032 at which time CCS is required.

Georgia Power's compliance strategy for Plant Yates Units 8-10 is limiting capacity factors to 40% to meet the standards for intermediate load CTs. The compliance strategy for Plant Bowen Units 7-8, McIntosh 12, and Wansley 10-11 is to meet the emissions standards for baseload CTs until 2032, at which time these units will take a 40% capacity factor limitation since they are not equipped with CCS.

Both the primary and alternative proposed repeals of the 111 GHG Rules eliminate all CO_2 emissions standards for existing coal and gas steam units. As an outcome of the 2025 IRP stipulation, the GPSC approved the Company to pursue the co-firing pathway for existing coal units at Plants Bowen and Scherer. The Company has engaged a third-party vendor to perform an engineering study evaluating the technical feasibility and operational impacts of co-firing. The Company intends to complete these studies and not pursue additional investment given the proposed repeal of the rules. Additionally, the Company will submit the first 111 GHG Semi-annual report to the Commission in March 2026 that will include updates around progress and cost.

Yates Units 6-7 were previously converted to gas as part of the Company's MATS compliance strategy. The Company expected current operations would comply with numerical emissions limit for the baseload natural gas subcategory in the 111 GHG Rules and no additional investment was needed to comply with the presumptively approvable standard. Therefore, the compliance strategy does not need to be adjusted as a result of the proposed repeal.

Gaston Units 1-4 utilize natural gas as the primary fuel with coal backup. Because natural gas is already the primary fuel, Georgia Power also expected this existing capability would be considered as a compliance option with the 111 GHG Rule. No adjustment to the compliance strategy is necessary as a result of the proposed repeal.

The Company will continue as outlined above until such time as there is more certainty on the ultimate outcome for the regulation, at which time the Company will reevaluate and adapt the compliance strategy as appropriate.

3.0 Financial Summary

The environmental compliance capital, O&M, and CCR ARO costs are recovered through the Environmental Compliance Cost Recovery ("ECCR") tariff, established in the GPSC's final order in Docket 25060. The estimated environmental capital expenditures for 2026 through 2030 are $117 million, $68 million, $60 million, $60 million, $74 million, respectively. The Company's compliance strategy, including potential unit retirement and replacement decisions, and future environmental capital expenditures will be affected by the final requirements of any new or revised environmental statutes and regulations that are enacted, including the proposed environmental legislation and regulations described; the cost, availability, and existing inventory of emissions allowances; and the Company's fuel mix.

For CCR ARO, the Company is required to adhere to Accounting Standards Codification ("ASC") 410-20 (formerly Financial Accounting Standard No. 143 and Financial Accounting Standards Board ("FASB") Interpretation No. 47) which requires the Company to record the legal obligation associated with the retirement of a long-lived asset. In accordance with ASC 410-20, the Company records the estimated closure and post closure care costs of CCR ash ponds and landfills under the federal and state CCR Rules. Georgia Power's current cost estimate applicable to retail customers for the CCR ARO program over the coming decades is approximately $8.5 billion, including approximately $2.0 billion in actual costs previously incurred.

The Company will continue providing CCR projects semi-annual progress and cost data updates to the Commission under Docket No. 43083. As outlined in the Company's CCR ARO Program Semi-Annual Program Status Report, the current forecasted spend for the CCR ARO program is the best estimate Georgia Power has at this time for this long-term compliance program spanning over approximately the next 50 years into the future. The Company's cost estimates are based on various assumptions related to closure and post-closure costs, timing of future cash outlays, inflation and discount rates, and the methods for complying with closure requirements. Georgia Power will continue to update its cost estimates and ARO liabilities periodically as additional information related to these assumptions becomes available.

ECS – Appendix A – Monitored Regulations

In addition to the environmental legislation, regulation, policy, and permitting discussed in the ECS, the Company continues to monitor various environmental compliance topics for any impacts to the compliance strategy. Examples of monitored regulations are listed below:

CAA – Industrial Boiler MACT

In October 2022, EPA finalized amendments to the Industrial Boiler MACT rule in response to a remand of certain requirements by the D.C. Circuit Court. The changes did not affect any Company generating units, and no changes to the ECS are required.

CAA – Reciprocating Internal Combustion Engines MACT

On August 30, 2024, EPA published its final rule to amend the NESHAP for Reciprocating Internal Combustion Engines ("RICE"), the New Source Performance Standards ("NSPS") for Stationary Compression Ignition Internal Combustion Engines ("CI ICE NSPS"), and the NSPS for Stationary Spark Ignition Internal Combustion Engines ("SI ICE NSPS"). The Final Rule requires electronic reporting and makes various other revisions to the rules.

CAA – New Source Performance Standards

In September 2022, a coalition of 17 environmental groups submitted a petition for rulemaking to EPA to eliminate startup, shutdown, malfunction and/or maintenance exemptions under the NSPS.

On December 13, 2024, EPA proposed the review of Standards of Performance for Stationary Combustion Turbines, which will apply to CTs that begin construction, modification, or reconstruction after the date of publication of the proposed rule in the Federal Register. The final rule was signed on January 9, 2026, in accordance with a Consent Decree. This rule subcategorizes CTs based on size, capacity factor, and design efficiency. NO_X emission standards are set based on combustion controls for most subcategories and based on installation of SCR technology only for the largest, highest capacity factor subcategory. The Company is evaluating this rulemaking, and no adjustments to the compliance strategy are expected for the applicable Bowen Units 7-8, Wansley Units 10-11, and McIntosh Unit 12, which are already designed and permitted with SCR controls. Yates Units 8-10 are not subject to this final rule because construction of those units began before December 13, 2024.

CAA – Other NAAQS (40 CFR 50)

In addition to ozone and particulate matter, EPA also sets NAAQS for SO_2, NO_2, lead, and carbon monoxide ("CO"). However, the most recent revisions to any of these standards occurred in 2010 or earlier and subsequent reviews completed by EPA resulted in no changes. Implementation of current standards is complete with no areas in Georgia or Alabama designated as nonattainment.

EPA is under a consent decree schedule to review and publish revisions to the secondary NAAQS for NO_2 and SO_2, as well as the secondary NAAQS for ecological effects for PM. On December 27, 2024, EPA promulgated a final rule addressing these standards. The final rule lowers the SO_2 secondary standard to 10 ppb averaged over a three-year period. The existing secondary standards for NO_x and PM are retained in this rulemaking. Lowering of the SO_2 secondary NAAQS is not expected to affect the Company's compliance strategy.

CAA – RMP

In 2024, EPA finalized revisions to the Risk Management Program ("RMP") requirements for highly hazardous chemicals, reversing actions taken with a 2019 RMP reconsideration rule. On March 12, 2025, EPA announced its intent to review RMP regulations which require facilities handling certain hazardous substances to develop a plan that identifies potential chemical accident effects, prevention measures, and emergency response procedures. On February 24, 2026, EPA proposed revisions to the RMP regulation making changes to the requirements promulgated in the 2024 rule.

CAA – HFC Refrigerants

EPA finalized revisions to the hydrofluorocarbon ("HFC") refrigerants phase down (mandated by Congress in 2020, due to the global warming potential of HFCs) in 2024, with the final rule becoming effective on December 10, 2024. The earliest deadline for compliance with updated leak repair requirements, as well as certain provisions specific to fire suppression equipment, is January 1, 2026. The Company will apply its current compliance strategy to new and existing affected equipment, as needed.

CAA – Greenhouse Gas Reporting Program

On September 16, 2025, EPA proposed a rule to reconsider the GHG Reporting Program outlined in 40 CFR Part 98. The proposal would eliminate mandatory GHG reporting for all source categories except those that report under 40 CFR Part 98 Subpart W, which does not apply to the Company. If finalized as proposed, the Company will not be required to report GHGs through the program beginning with the Reporting Year 2025. On February 27, EPA issued a final rule extending the deadline for the Reporting Year 2025 report to October 30, 2026. A final rule addressing reconsideration of the GHGRP is expected this year.

CAA – Endangerment Finding

On February 18, 2026, EPA published a final rule to rescind the 2009 GHG Endangerment Finding, which provides the basis for EPA to set GHG emissions standards for new motor vehicles under the Clean Air Act. This final rule also removes the requirements for new motor vehicles to meet GHG emissions levels but does not impact standards for other air pollutants.

CWA – Section 401 Water Quality Certifications

In September 2023, EPA finalized the Water Quality Certification Improvement Rule related to obtaining permits or licenses for any discharge into waters of the United States through CWA Section

401, which gives states authority over discharges that do not comply with existing state water quality requirements. On July 7, 2025, EPA published a notice establishing a public docket and listening sessions on implementation challenges associated with CWA Section 401. EPA states that it will use input from this process to determine whether guidance or rulemaking are necessary to address areas of regulatory uncertainty or implementation challenges regarding the scope of certification and neighboring jurisdiction implementation.

CWA – Nationwide Permit

Nationwide Permits ("NWP") authorize certain activities with minimal impact to a WOTUS, allowing projects to move forward without receiving an individual review under CWA Section 404. The USACE recently completed update or reissuance of the NWP program requirements. On June 18, 2025, the U.S. Army Corps of Engineers (Corps) published its proposal in the Federal Register to reissue the Nationwide Permits (NWPs), with some minor modifications. The current NWPs are set to expire on March 14, 2026.

CWA – Hazardous Discharges Planning

In March 2024, EPA signed a final rule in response to a consent decree between EPA and environmental groups that would require facility response plans ("FRPs") to address potential worst-case discharges of hazardous substances under the CWA. This would expand the current FRP program that only deals with oil releases. On September 12, 2025, EPA sent OMB a proposed rule to delay compliance dates for the HS FRP rule: Clean Water Act Hazardous Substance Facility Response Plans: Compliance Date Delay and Changes to Reflect Administration Policy. The HS FRP rule expands the current FRP program, which was only applicable to oil, to address potential worst-case discharges of CWA hazardous substances.

DOI – New Review Procedures for Wind and Solar

On July 15, the DOI issued new review procedures for wind and solar facilities in a memo titled, "Department Review Procedures for Decisions, Actions, Consultations, and Other Undertakings Related to Wind and Solar Energy Facilities". The memo states that all DOI-related actions related to wind and solar facilities must now require a multi-stage review including review by the Office of the Secretary. On July 29, 2025, DOI issued an order 3437, "Ending Preferential Treatment for Unreliable, Foreign-Controlled Energy Sources in Department Decision Making." Many DOI-related actions will be reviewed to identify any preferential treatment to wind and solar facilities and take steps to eliminate such treatment. On August 1, 2025, DOI issued an order 3438, "Managing Federal Energy Resources and Protecting the Environment." Procedure established to consider more energy dense alternatives to wind and solar projects on federal land in accordance with FLPMA and NEPA. On August 4, 2025, DOI issued a memo, "Ensuring Compliance with the Bald and Golden Eagle Protection Act and Executive Order 14315." These actions are anticipated to result in increased difficulty when permitting new wind and solar facilities.

PFAS Regulations

EPA has begun implementing regulation of per- and polyfluoroalkyl ("PFAS") substances through a variety of avenues across various environmental media. For example, in April 2024, the EPA published a final rulemaking to the Federal Register to designate certain types of PFAS as "hazardous substances" under the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"). In addition, in April 2024, EPA published a final rule establishing National Primary Drinking Water Regulations for six PFAS. EPA has also added many PFAS to the Toxics Release Inventory. In 2025, EPA announced various upcoming actions that may result in revisions to or rescission of existing requirements.

ESA Developments

The Company monitors developments related to the Endangered Species Act ("ESA") on an ongoing basis, especially for affected species found in the Southeast. ESA regulatory developments can affect the construction of new facilities and maintenance of existing infrastructure. In April 2024, the U.S. Fish and Wildlife Services ("USFWS") published various final rules under the ESA that provided for revisions to procedures for listing, delisting, and permitting. On November 1, 2025, the U.S. Fish and Wildlife Service (FWS) announced four proposed rules to revert certain sections of the ESA to the prior versions of the rules.

National Enforcement Compliance Initiatives (NECIs)

On March 12, 2025, EPA's Office of Enforcement and Compliance Assurance issued a memorandum to provide initial guidance on implementing the FY 2024–2027 NECIs in a manner consistent with the President's Executive Orders and with Administrator Zeldin's "Powering the Great American Comeback" Initiative. The memo announced changes to how EPA plans to implement enforcement around its previously established focus areas, including climate change, coal ash, air toxics, and chemical spills.

NEPA Regulations

On May 1, 2024, the Council for Environmental Quality ("CEQ") finalized updates to the NEPA regulations to implement the NEPA amendments included in the 2023 Fiscal Responsibility Act ("FRA"). This final rule enhanced consideration of climate change and environmental justice effects in the environmental review process. In subsequent litigation, the D.C. Circuit Court held that the CEQ lacks the statutory authority from Congress to bind federal agencies with NEPA regulations. On February 25, 2025, the CEQ published an interim final rule to rescind its existing implementing regulations for NEPA. On May 29, 2025, the U.S. Supreme Court issued its Seven County decision, in which the Court placed new limits on the scope of NEPA environmental reviews for federally backed projects. Subsequently, between June 30 and July 3, in coordination with CEQ, a dozen agencies issued revised NEPA implementation procedures with a focus on expediting infrastructure development and reducing costs.

TMDL Developments

States are required to identify impaired waters (waters that do not meet applicable water quality standards), develop total maximum daily loads ("TMDLs") for those waters, and impose point and non-point source limitations designed to bring the waters into compliance.

Other Generating Units

Other types of generating units, such as hydroelectric, nuclear, renewables, battery energy storage systems, and distributed energy resources (such as reciprocating internal combustion engines) also comply with various environmental requirements set by EPA and EPD related to siting, construction, and/or operation. Hydro and nuclear facilities also consider environmental impacts through regulatory processes at the Federal Energy Regulatory Commission ("FERC") or the Nuclear Regulatory Commission ("NRC").

Federal Legislation

Various pieces of environmental-related legislation are being proposed and considered in the U.S. Congress. Recent bills passed by the U.S. House of Representatives in December 2025 include the Standardizing Permitting and Expediting Economic Development ("SPEED") Act and the Promoting Efficient Review for Modern Infrastructure Today ("PERMIT") Act. The main purpose of the SPEED Act is to reform the National Environmental Policy Act in order to streamline the review process. The PERMIT Act revises the Federal Water Pollution Control Act to clarify requirements for waters of the United States and other matters. Neither of these bills has been taken up by the U.S. Senate.

ECS – Appendix B – Acronyms/Abbreviations

ABUC	Ash Beneficial Use Center
ACE	Affordable Clean Energy
ACI	Activated Carbon Injection
ACM	Advanced Closure Methods
ADEM	Alabama Department of Environmental Management
ALK	Alkali Sorbent Injection
ARO	Asset Retirement Obligation
ASC	Accounting Standards Codification
BART	Best Available Retrofit Technology
BH	Baghouse
BPJ	Best Professional Judgment
BTA	Best Technology Available
CAA	Clean Air Act
CAIR	Clean Air Interstate Rule
CASAC	Clean Air Scientific Advisory Committee
CCR	Coal Combustion Residuals
CCRMU	Coal Combustion Residuals Management Unit
CCS	Carbon Capture & Storage
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CI ICE	Stationary Compression Ignition Internal Combustion Engines
CO	Carbon Monoxide
CO_2	Carbon Dioxide
COHPAC	Compact Hybrid Particulate Collector
COP	Conference of Parties
CORE-CM	DOE's Carbon Ore, Rare Earths and Critical Mineral Initiative
CMA	Meeting of Parties to the Paris Agreement
CMP	Meeting of the Parties to the Kyoto Protocol
CPP	Clean Power Plan

CRL	Combustion Residual Leachate
CSAPR	Cross State Air Pollution Rule
CT MACT	Combustion Turbine MACT
CWA	Clean Water Act
CWWS	Cylindrical Wedge Wire Screens
DAC	Direct Air Capture
DNR	Department of Natural Resources
DOE	Department of Energy
DSI	Dry Sorbent Injection
ECCR	Environmental Compliance Cost Recovery
ECS	Environmental Compliance Strategy
EGU	Electric Generating Unit
EKPC	East Kentucky Power Cooperative
ELG	Effluent Limitations Guidelines
EPA	U.S. Environmental Protection Agency
EPD	Georgia Environmental Protection Division
EPRI	Electric Power Research Institute
ESA	Endangered Species Act
ESP	Electrostatic Precipitator
FASB	Financial Accounting Standards Board
FERC	Federal Energy Regulatory Commission
FGD	Flue Gas Desulfurization
FIP	Federal Implementation Plan
fPM	Filterable Particulate Matter
FRP	Facility Response Plan
GAAP	Generally Accepted Accounting Principle
GHG	Greenhouse Gas
GPC	Georgia Power Company
GPSC	Georgia Public Service Commission
GWPS	Groundwater Protection Standard
HAP	Hazardous Air Pollutant

HCl	Hydrogen Chlorine
HDPE	High-Density Polyethylene
HFC	Hydrofluorocarbon
HLRW	High-Level Radioactive Waste
HTL	Heat Transfer Loop
ICR	Information Collection Request
IIJA	Infrastructure Investment and Jobs Act
IRA	Inflation Reduction Act
IRP	Integrated Resource Plan
LLRW	Low Level Radioactive Waste
LNCS	Low NO_x Combustion System
MACT	Maximum Achievable Control Technology
MATS	Mercury and Air Toxics Standards
MM2A	Major MACT to Area
MRCS	Mercury Re-emission Control System
NAAQS	National Ambient Air Quality Standards
NCCC	National Carbon Capture Center
NDC	Nationally Determined Contribution
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NGCC	Natural Gas Combined Cycle
NOPP	Notice of Planned Participation
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NSPS	New Source Performance Standards
NRC	Nuclear Regulatory Commission
NSR	New Source Review
NWP	Nationwide Permits
NWPR	Navigable Waters Protection Rule
OC	Oxidation Catalyst

OFA	Overfire Air
O&M	Operations and Maintenance
PCC	Post-Closure Care
PCCC	Permanently Ceasing Coal Combustion
PFAS	Per- and Polyfluoroalkyl Substances
PJFF	Pulse Jet Fabric Filter
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter less than 2.5 micrometers in size
PM CEMS	Particulate Matter Continuous Emissions Monitoring
PPB	Parts per Billion
PRB	Powder River Basin Coal
PSC	Georgia Public Service Commission
PSD	Prevention of Significant Deterioration
R&D	Research and Development
RFP	Request for Proposals
RCRA	Resource Conservation and Recovery Act
RICE	Reciprocating Internal Combustion Engines
RMDC	Remote Mechanical Drag Chain
RMP	Risk Management Program
RTR	Risk and Technology Review
RULOF	Remaining Useful Life and Other Factors
SCR	Selective Catalytic Reduction
SC-GHG	Social Cost of Greenhouse Gases
SEC	Securities and Exchange Commission
SI	Surface Impoundment
SIP	State Implementation Plan
SI ICE	Stationary Spark Ignition Internal Combustion Engines
SNCR	Selective Non-Catalytic Reduction
SO_2	Sulfur Dioxide
SSM	Startup, Shutdown, Malfunction
TMDL	Total Maximum Daily Load

TWS	Traveling Water Screens
UNFCCC	United Nations Framework Convention on Climate Change
USFWS	United States Fish and Wildlife Service
UWAG	Utility Water Action Group
USWAG	Utility Solid Waste Activities Group
VIP	Voluntary Incentive Program
VOC	Volatile Organic Compounds
WIIN Act	Water Infrastructure Improvements for the Nation Act
WOTUS	Waters of the United States
WRC	Water Research Center
WRCC	Water Research and Conservation Center
ZLD	Zero Liquid Discharge

ECS – Appendix C – R&D and Environmental Control Alternatives

R&D continues to be an integral part of the overall Georgia Power environmental strategy and compliance plan. Through research, development, and demonstration, technologies are evaluated and selected for possible implementation to meet compliance with federal and state regulatory requirements. Technology-related decisions are made based on compliance alternatives, technical review (often following actual testing), schedules, equipment-vendor price quotes, total costs over the useful life, specific unit issues, and performance guarantees. Operations, maintenance, and cost-effectiveness are important parts of the decision-making process.

Since the implementation of the CAA Amendments of 1990, R&D has been crucial in assuring that the best-possible environmental compliance strategies are selected for implementation at Georgia Power. Georgia Power and Southern Company leverage existing knowledge through industry affiliations across the U.S. and around the world to identify these opportunities and help reach cost-effective paths forward. To minimize cost and risk, only proven technologies should be implemented commercially. These industry R&D efforts have successfully tested low- NO_x burners, precipitators, catalyst materials for SCRs, scrubbers, mercury reduction systems, wastewater treatment systems, water balance optimization measures, ash beneficial use, and other equipment and have contributed to Georgia Power's ability to meet stringent requirements while continuing to provide affordable energy for customers. Insight from this research benefits vendor and material selection, construction, and long-term operation, efficiency, and flexibility.

This appendix describes R&D efforts related to water, ash beneficial use, and carbon emissions and provides a list of control technologies considered in an ongoing effort to meet mandated requirements in a timely manner, maintain system reliability, and assure cost-effective generation for customers.

Water Research and Conservation Center

Originally developed in 2012 through collaboration with the Electric Power Research Institute ("EPRI") and Southern Company, the Water Research Center ("WRC") at Plant Bowen provided a venue for technology evaluations to address water use, withdrawal, consumption, treatment, and recycling throughout the power generation process. The WRC generated information regarding current and future regulatory compliance issues related to water withdrawal, use, and discharge restrictions that will directly support the Company's ongoing evaluation of the ELG rule and associated strategy. Work completed at the WRC will be used to inform technology decisions for compliance. Due to the success of the WRC, Southern Company and EPRI expanded the WRC to the Water Research and Conservation Center ("WRCC"), building a state-of-the-art facility at Georgia Power's Plant McDonough. This research center provides the infrastructure needed to test and identify promising water technologies. To better manage and conserve water across our thermoelectric power generation sites, the WRCC promotes advancements in power plant cooling systems leading to reduced water withdrawal and consumption as well as improved plant efficiency while optimizing total cost and energy generation.

Since the operational start of the WRCC in 2020, several projects have been completed including an evaluation of condenser tube coatings and surface modifications in the Heat Transfer Loop ("HTL") as part of a Department of Energy ("DOE") funded project to investigate technologies to improve heat transfer and mitigate heat transfer losses due to condenser tube fouling. Other completed projects at the WRCC include evaluation of enhanced condenser tubes, a non-chlorine biocide, as well as a

technology to monitor deposition on heat transfer surfaces for better identification and control of fouling. Several ongoing projects include an evaluation of treated municipal effluent as an alternative water source for cooling and an electrocoagulation water treatment pilot.

Ash Beneficial Use Center

The Company, in partnership with EPRI and other utilities, has developed a center, located at Plant Bowen, for beneficial use of harvested CCR. The Ash Beneficial Use Center ("ABUC") will strive to develop additional uses of CCR and better technologies to process ash for beneficial use, which can help reduce future costs to CCR closure projects and further open opportunities to reuse this byproduct.

The center aims to develop new technologies or processes that drive downward cost pressure associated with beneficial use and expand current and potential markets. In addition, technology developments or enhancements to current beneficial use operations could ultimately allow Georgia Power to reduce the amount of CCR that is destined for storage in landfills or reclaim CCR already stored in landfills and ash ponds. This may result in reduced capital and O&M costs for CCR management. The strategy associated with introducing additional beneficiated ash into the market, as well as limiting the quantity of CCR in landfills, benefits both current and future customers.

The core capability of the center is pre-processing harvested ash for use in technology demonstrations. Pre-processing includes drying, classifying, storing, and delivering the ash for beneficial use. The major mechanical components of the center were completed in February 2021, and full commissioning and acceptance testing were completed in July 2021.

In September 2021, the ABUC was used to execute part of a critical mineral extraction project funded by the U.S Department of Defense. Approximately 75 tons of ash were harvested from a Southern Company ash pond in Alabama, and the ash was screened, dried and classified using the ABUC infrastructure. Carbon was removed from the ash using a triboelectrostatic belt separator. Lessons learned during this project will allow Georgia Power to better understand process performance and energy costs for potential future beneficiation projects.

Georgia Power and EPRI have met with several technology developers to discuss potential demonstrations at the ABUC. Technologies under consideration include: lower cost non-thermal carbon separation; lower cost non-thermal ash drying; evaluating energy efficient grinding systems to enable beneficial use of currently unusable volumes of coarse ash in the concrete market; production of aggregate from ponded ash for concrete and other construction applications; production of coal ash geopolymer products, a potential high volume and high value use case; and production of ferric chloride from coal ash for use in water treatment, replacing conventional commercially sourced material. Increased knowledge of these emerging technologies and potential technology evaluations at ABUC will help Georgia Power to optimize current beneficial use operations and perform informed assessments on implementing new commercial beneficial use opportunities.

The Company plans to invest in upgrades during the 2025-2028 timeframe at the ABUC to further enhance its capabilities. Specific initiatives will involve general maintenance and repairs, installation of pilot-scale drying, deagglomerating, grinding, and material classifying equipment, as well as 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 enhance ABUC's capabilities and support the Company's ongoing efforts in coal ash R&D as part of its commitment to innovative and sustainable CCR management practices. GPC is also engaged in a pilot study for beneficial use of harvested ash in concrete masonry units ("CMUs").

Carbon Emissions Research & Development

The National Carbon Capture Center ("NCCC"), managed and operated by Southern Company and located in Wilsonville, Alabama, is working to accelerate the commercialization of advanced technologies to reduce GHG emissions. The NCCC was created in partnership with the DOE in 2009 and has worked with over 30 government, university, and research organizations from seven countries. The NCCC serves as a unique test bed for third-party developers to help bridge the gap between laboratory research and large-scale demonstrations to evaluate promising technologies for future commercial deployment. The R&D scope of the NCCC includes carbon capture for power generation and industrial sources, carbon conversion, and negative-emission technologies such as direct air capture.

Negative carbon solutions are an important component of a net-zero carbon approach and counterbalance direct GHG emissions from Company operations through either the actual capture and storage of GHG or the application of carbon offset credits created by qualifying GHG reduction projects. While many of these negative carbon technologies are still evolving or in development across the industry and the country, Georgia Power faces unique challenges for carbon capture and storage in the state of Georgia. Unlike some neighboring states with extensive oil and gas exploration and development, Georgia lacks the detailed geological information needed to prepare for CCS deployment. To minimize risks to customers in a net-zero future, carbon capture technology and viable locations for storage will likely be necessary for continued fossil fuel operations. CCS could potentially be applied as an add-on environmental control to a generating unit to remove GHG emissions at their source or could be used to remove GHG from ambient air, known as direct air capture ("DAC"). Due to the historic lack of geologic feasibility studies in the state of Georgia, Georgia Power began partnering in 2021 with Southern Company to evaluate the technical and economic viability of CCS in potential locations in Georgia. In 2024, test borings were completed at three sites—Bartow, Wayne, and Brantley counties—to assess deep geologic formations for potential CO_2 storage. These stratigraphic wells, drilled more than a mile underground, provide critical data on porosity and permeability of formations that could support future CCS deployment. Although commercial implementation is years away, these types of studies are necessary to gather technical insights into CO_2 storage feasibility thereby supporting diversified generation options in the future.

In 2022, Georgia Power and Mitsubishi Power, alongside EPRI, successfully validated fuel blending of hydrogen and natural gas at both partial and full load on an M501G natural gas turbine at Georgia

Power's Plant McDonough in Smyrna, Georgia. The project was the first to demonstrate 20% by volume hydrogen fuel blending on an advanced class gas turbine in North America, and the largest test of this kind to date, with the 20% blend providing an approximately 7% reduction in carbon emissions compared to natural gas.

Building on this success, in 2024, the turbine underwent a major upgrade from steam-cooled to air-cooled, enabling integration of Mitsubishi Power's J-series combustion technology. These enhancements improved operational flexibility, reduced maintenance costs, and prepared the unit for higher hydrogen co-firing capability. Subsequently, in 2025, Georgia Power achieved a global milestone by demonstrating a 50% hydrogen blend with natural gas on the upgraded turbine—the largest test of its kind worldwide. This breakthrough reduced CO_2 emissions by approximately 22%, marking a significant step toward low-carbon power generation and reinforcing Southern Company's commitment to advancing hydrogen as a clean energy solution.

ECS – Appendix D – Environmental Control Alternatives Index

I. Low- NO_x Combustion Systems

II. Selective Catalytic Reduction

III. Selective Noncatalytic Reduction

IV. Fuel Switch to Natural Gas

V. Fuel Switch to Powder River Basin Coal

VI. Flue Gas Desulfurization

VII. Dry Sorbent Injection

VIII. Baghouses

IX. Activated Carbon Injection and Alkali Sorbent Injection

X. Mercury Re-emission Control Systems

XI. Containment and Control Technologies for Ash Storage Areas

XII. Cooling Water Intake Screen Technology

XIII. Water Cooling Technologies

XIV. Dry or Closed-Loop Ash Handling Methods

XV. Landfills

XVI. Wastewater Treatment

XVII. Zero Liquid Discharge Technologies

ENVIRONMENTAL CONTROL ALTERNATIVES

I. Low- NO_x Combustion Systems ("LNCS")

Low- NO_x combustion systems is a generic term for burners and/or air systems designed to combust fuel while reducing the amount of NO_x that is formed. Since there are several different firing arrangements for fossil fuel-fired units, there are several different types of LNCS.

NO_x is formed during combustion from either the nitrogen in the fuel or the air. NO_x formed from nitrogen in air requires high-flame temperatures and because of this, is usually referred to as thermal NO_x. While some fuels contain small amounts (2 percent or less) of nitrogen as a chemical constituent, thermal NO_x is by far the predominant source of emissions over fuel NO_x.

LNCS can include burners that are designed to reduce either fuel NO_x or thermal NO_x or both. LNCS can also include overfire air, which is air that is added above the main combustion zone to finish the combustion process, to reduce NO_x. For all LNCS, the balance of air and fuel must be optimized to achieve NO_x reduction and to minimize additional production of carbon monoxide.

II. Selective Catalytic Reduction ("SCR")

SCR technology involves the catalytic reaction of ammonia, which is injected into the flue gas, with NO_x to produce molecular nitrogen (N_2) and water vapor. These reactions take place across one or

more layers of catalyst in the SCR reactor and generally result in a NO_x reduction capability of 85 to 90 percent depending upon the particular application. The SCR is sensitive to temperature and must be placed in an area with appropriate flue gas temperatures to operate optimally.

III. Selective Noncatalytic Reduction ("SNCR")

SNCR employs chemical injection of ammonia or urea directly into the boiler at high flue gas temperatures between 1,600 and 2,100°F. In this temperature range, which is typically near the top of the boiler close to the furnace exit or in the convective pass, the reagent reacts with NO_x to form nitrogen and water without the use of a catalyst to promote the reaction.

Application of SNCR to utility-scale boilers is highly site specific. Generally, SNCR is capable of 15- to 40-percent NO_x removal. One particular benefit of SNCR as compared to SCR is that capital cost is limited due to the absence of catalyst and the associated reactor vessel. However, the difficulty in meeting temperature and distribution requirements and the greater potential for ammonia slip makes implementation of the technology difficult on many boilers, especially on a large-scale boiler.

IV. Fuel Switch to Natural Gas

Depending on availability of natural gas supply and pipelines, existing coal plants may be partially or completely converted to burn natural gas instead of coal as an emissions control strategy, since natural gas contains very little sulfur and trace metals are largely absent.

NO_x emissions result from both fuel chemistry and from the air used in combustion. Therefore, a natural gas conversion does not automatically eliminate emissions of nitrogen oxides. The level of NO_x in such a conversion is determined by the boiler design plus the presence and design of low NO_x combustion systems.

V. Fuel Switch to Powder River Basin ("PRB") Coal

PRB coal is a subbituminous coal mined primarily from seams in the PRB located in Wyoming and Montana in the western U.S. PRB coal may be considered as an emission control strategy for bituminous coal-fired units due to lower sulfur content that enhances the ability of generating units to minimize SO_2 emissions. NO_x emission reductions are also realized because of the lower combustion flame temperature brought about by the higher moisture content in PRB coal. With this increase in moisture content come lower heat contents (heating values), possible loss of generation capacity due to unit load derating, increased heat rate, and often higher operating and maintenance costs. The considerations for a fuel switch to PRB coal are highly dependent on site-specific operating characteristics and equipment layout.

VI. Scrubber or Flue Gas Desulfurization ("FGD")

A scrubber or FGD is any process that removes sulfur oxides, which is primarily SO_2, from flue gas. Wet scrubber processes collect the SO_2 by treating the flue gas with a water-based solution or slurry. One typical design the utility industry uses is a spray tower module where the flue gas flows up the tower and a series of nozzles spray an alkaline solution, typically limestone based, into the flue gas. Another type is a jet bubbling reactor where the flue gas flows into a limestone slurry bath. The

chemical reaction in wet FGDs between limestone and SO_2 produces predominantly calcium sulfate, or gypsum. The wet processes are very efficient and typically remove 95% of the SO_2 in flue gas.

Dry processes typically inject an alkaline slurry into the flue gas stream in a spray dryer followed by a particulate control device. The spray dryer is a unit where the hot flue gases are contacted with the wet alkaline spray that absorbs the SO_2. The hot flue gas evaporates the water and leaves a dry residue that can then be captured with the fly ash, typically in a baghouse. The residue contains a mixture of calcium sulfite/sulfate, along with the fly ash from the fuel. This waste is generally not suitable for other uses and must be disposed of in a landfill. Historically, dry scrubbing is considered to typically remove 75 to 90 percent of the SO_2 in flue gas.

VII. Dry Sorbent Injection ("DSI")

Dry sorbent injection is a technology that can help reduce acid gas emissions, such as HCl through two basic steps. In step one, a powdered sorbent is injected into the flue gas where it reacts with the HCl. The sorbents most commonly associated with DSI are trona (sodium sesquicarbonate, a naturally occurring mineral mined in Wyoming), sodium bicarbonate, and hydrated lime. For step two, the compound is removed by a downstream PM control device such as an ESP or a baghouse, with HCl removal performance highly dependent on site-specific factors.

DSI systems generally do not require significant capital expenses but may rely on significant quantities of sorbent to operate effectively, which increases the operating costs. Waste disposal for DSI may also be a significant variable cost. In addition, DSI's potential effectiveness is limited to certain types of plants, typically plants that are 300 megawatts or less and burn low-sulfur coal.

VIII. Baghouses

Baghouses are filter devices that remove solid particles from flue gas streams by passing the gases through a fabric, and thus collecting the particles. Baghouses can either operate as a standalone control device or in conjunction with other particulate capture devices. A baghouse located downstream of an existing ESP was patented by EPRI and is known as a Compact Hybrid Particulate Collector ("COHPAC"). The basic COHPAC concept is to place a pulse-jet fabric filter ("PJFF") downstream of an existing ESP to serve as a "polishing" or performance-upgrading unit. Since the ESP removes a significant amount of the particles from the gas stream the flue gas reaching the baghouse has a significantly reduced dust load. As a result, the physical size of a COHPAC PJFF can be one-fourth the size of a normal PJFF, which may reduce the relative cost significantly.

IX. Activated Carbon Injection ("ACI") and Alkali Sorbent Injection ("ALK")

ACI for mercury control involves the addition of powdered activated carbon to flue gas streams where it adsorbs vapor phase mercury. Once injected into the flue gas, the activated carbon (and adsorbed mercury) must be collected in a particulate collection device. The applications of this technology include injection ahead of an ESP or downstream of an existing ESP but upstream of a high ratio (COHPAC) baghouse, which is an EPRI patented technology known as TOXECON™.

Typically, due to rapid removal of the carbon in the ESP and limited contact time with the flue gas, these applications typically achieve lower removal of mercury than carbon into baghouses. In either application, the mercury removal effectiveness of ACI can be enhanced when burning coals with higher sulfur content (e.g. non-PRB coals) by employing ALK, typically hydrated lime injection, ahead of the ACI. Typically, the hydrated lime used for ALK is less expensive than the activated carbon, so the use of ACI plus ALK is a more economical process than ACI alone for a given mercury capture target.

X. Mercury Re-Emission Controls System ("MRCS")

Wet scrubbers are effective at removing oxidized mercury. However, as the captured mercury may remain in a dissolved form in the scrubber slurry in the vessel, the scrubber may from time to time re-emit the mercury that was captured from the flue gas, causing increased levels of mercury emissions out of the stack. The addition of additives, such as activated carbon, into the scrubber slurry can help prevent the occurrence of mercury re-emission by encouraging the precipitation of the mercury dissolved in the slurry.

XI. Containment and Control Technologies for Ash Storage Areas

Several technologies are available to control and close ash storage areas. The most common or traditional closure technologies approaches include reducing the closure footprint through consolidation or partial removal of material, liners and cap systems. Proven engineering methods that divert (slurry walls, sheet pile walls, and *in situ* solidification and stabilization) or extract (vertical and/or horizontal pumping wells and French drains) water from the system can be used to supplement the traditional closure technologies and manage water during closure and post closure. A brief description of each technology is provided below.

Closure Footprint Reduction

Ash ponds closed in place may involve consolidating ash into a smaller footprint to reduce the area requiring long term O&M associated with maintaining the closed facility.

Liner Systems

A liner system is a layer of impermeable or low-permeability material placed at the bottom and top of ash storage facilities, which prevents stormwater from entering the ash stack, and leachate from entering soil and groundwater. Liner systems can be constructed of compacted natural material (such as clay), synthetic materials (such as High-Density Polyethylene ("HDPE")), or composite materials (combination of synthetic and natural materials). Regulations require liner systems under new ash storage areas.

Caps

A cap is a layer of impermeable or low-permeability material placed on top of ash storage areas, to prevent surface water infiltration and resulting leachate. As with liners, caps can be constructed of natural materials (for example, compacted clay), synthetic materials (HDPE), or composite materials. Capping may be used in conjunction with other proven engineering methods to effectively encapsulate a material in place.

Slurry Walls

Slurry walls are subsurface walls that are designed and installed to a pre-determined depth based on site conditions and project objectives to divert water away from ash closed in place. A trench is filled with a slurry of materials that forms a barrier to prevent the migration of groundwater within the area. Slurry materials can include various mixtures of soil, bentonite clay, and/or cement.

Sheet Pile Walls

Sheet pile walls include interlocking wood, concrete, or steel sectors driven into the ground or forced into pre-dug trenches to a specified design depth based on project objectives. As with slurry walls, sheet pile walls form a barrier to control the migration of groundwater. Sheet piling is often used as a temporary measure of containment during closure to facilitate dewatering and excavation, or while other containment is constructed.

In Situ Solidification/Stabilization

Solidification/stabilization describes the technique of solidifying soil or waste material, to reduce the potential for groundwater interaction. Solidification refers to the addition of a binder to produce a solid. Stabilization refers to the addition of a chemical agent to convert the soil or waste material to a more chemically stable form. Some additives, such as portland cement, produce both physical and chemical changes. Large augers or equipment with rotary blades are typically used to mix the additives with contaminated soil or waste material.

Pumping Wells/French Drains

Pumping wells, both horizontal and vertical, and French drains can be used to intercept and remove water from the subsurface during and after closure. Pumping wells are perforated pipes installed in the subsurface either vertically or horizontally where water collects and is removed through pumping. French drains are perforated pipes installed in the subsurface to collect and convey water either through gravity drainage or pumping. In both extraction methods, water is removed from the system, treated, and discharged.

XII. Cooling Water Intake Screen Technology

Inclined traveling water screens ("TWS") and cylindrical wedge wire screens ("CWWS") will generally be the preferred water screen technologies. Both screens will allow debris handling and the design is also adaptable to minimize impingement and entrainment. Screen wash systems for the TWS and airburst systems for the CWWS can maintain screen cleanliness to an acceptable level. If needed, continuous fish and debris handling systems can also be designed to work with the TWS. As needed, fish-return technologies are also available.

XIII. Water Cooling Technologies

Cooling water systems are generally placed into two categories: either wet systems, which use water as the cooling medium, or dry ZLD systems that utilize air. Wet cooling systems withdraw water to absorb heat via indirect contact with steam in a condenser. These wet cooling systems are divided into two types, based on the manner in which the cooling water is used: once-through and closed-

cycle systems with cooling towers or ponds. Unlike once-through systems that continuously draw fresh cold water from a large water source, closed cycle systems recirculate the same cooling water in a continuous loop through the condenser, with only very small amounts of water being withdrawn from a source to replace the water that is lost due to evaporation, drift, and blowdown in the cooling tower.

Because of the relative simplicity, the capital and operating costs for once-through systems are less than those for closed-cycle systems with a cooling tower. Once-through systems can also include helper cooling towers to reduce thermal load at the water discharge point, but these systems do not reduce water withdrawals. Closed-cycle cooling water systems reduce water withdrawals by about 95%. Because of this, use of a closed-cycle system with a cooling tower is one potential method of minimizing impingement and entrainment. However, consumptive use of water is increased from use of cooling towers and approximately 75% of the cooling water withdrawn is not returned to source but is lost to the atmosphere via evaporation.

Dry cooling systems transfer heat to the atmosphere without the use of water. Steam leaving the turbine is piped to an air-cooled, finned-tube condenser. Dry cooling reduces power plant efficiency, requires a large area of land, and is considerably more expensive than wet cooling. A hybrid system incorporates elements of both wet and dry cooling systems to maximize the benefits of each. Few large-scale applications of hybrid systems exist in the United States and the cost is commensurate with that of dry cooling. Neither a dry nor a hybrid cooling system is considered an economically or technically viable option for retrofit of an existing generating unit in the Southeast.

XIV. Dry or Closed-Loop Ash Handling Methods

To prevent the discharge of ash sluicing water, facilities can convert to dry handling or closed loop ash sluicing. Such ash handling systems include pneumatic dry ash handling equipment (typically used for lighter fly ash) and remote submerged drag chain conveyors and ash coolers (typically used for bottom ash). These systems are utilized in conjunction with additional storage silos and collection systems to facilitate disposal or reuse options.

XV. Landfills

With ash ponds no longer in use, use of landfills is the alternative for long-term ash storage or disposal. This technology can be implemented for ash and gypsum, requiring regulatory permitting, hydrogeologic/geologic studies, and large amounts of available property. In addition, a leachate collection and pumping system would be installed to manage any landfill leachate collected and groundwater monitoring is required.

XVI. Wastewater Treatment

Wastewater treatment systems remove or reduce certain constituents in wastewater prior to discharge. Wastewater treatment needs are highly site- and waste stream-specific and can include various systems or equipment, such as settling basins, tanks, clarifiers, pH adjustment, and associated pumps, piping and equipment, to meet site-specific needs.

Physical-chemical treatment systems are used to reduce solids and certain metals within a waste stream. These systems may include lined settling basins, tanks, clarifiers, pH adjustment, and associated pumps, piping and equipment. These systems are widely used across industries.

Phys-chem-bio treatment includes the same components as a physical-chemical system with the addition of a biological treatment system to remove selenium and nitrate from the waste stream. This system can be used for the FGD wastewater. These systems are newer technologies that continue to be tested and researched.

For membrane-based treatment, FGD return water use is maximized and FGD wastewater discharge is minimized. The chloride purge stream is processed through an advanced membrane process to produce a clean permeate stream and a small brine concentrate stream. The concentrate is managed either through third party disposal, thermal treatment such as evaporation or crystallization, ash conditioning and landfill on-site or off-site, or paste processing and landfill on-site. The permeate may be discharged or may be managed through recycling back to the FGD system / boiler make-up if the unit is operational at the time.

XVII. Zero Liquid Discharge Technologies

A system to eliminate liquid discharge is using heat to evaporate water and concentrate solids and other contaminants. Some of these systems can be operated to achieve full evaporation of liquid, resulting in only a solid product (crystallization), or achieve partial evaporation of liquid. Thermal technologies can be used as standalone systems, or in series with membranes to first reduce the volume of water needed for thermal treatment. These evaporative processes can be applied to achieve ZLD.

ZLD can also be achieved with liquid encapsulation. Encapsulation is a process that can be used to eliminate FGD wastewater discharge. It uses chemical reactions and/or absorption processes to bond materials together so that wastewater is incorporated into the solid material. This process is also referred to as solidification. The solids are then landfilled.

Deep well injection of water is another process that meets the definition of ZLD as prescribed by the Supplemental ELG rule, and as authorized through an Underground Injection Control (UIC) permitting program.

It should be noted that ZLD technologies warrant further evaluation to assess operational feasibility on a plant-by-plant basis, given the substantial variability in environmental control systems, fuel sources, and the associated wastewater characteristics at a given site.

ECS – Appendix E – High-Level and Low-Level Radioactive Waste Storage

PLANTS HATCH AND VOGTLE

Georgia Power's affiliate, Southern Nuclear Operating Company ("Southern Nuclear") safely operates and maintains Plants Hatch and Vogtle in accordance with industry standards and regulatory requirements. Southern Nuclear is dedicated to maintaining the highest standards for safely handling radioactive waste to protect the public, the environment, and its workers.

High-Level Radioactive Waste ("HLRW" - spent fuel)

Dry Cask Storage:

Plant Hatch and Plant Vogtle currently store spent fuel in underwater spent fuel pools and some above ground in dry casks on concrete pads known as Independent Spent Fuel Storage Installations until such time that the federal government licenses and builds a permanent disposal facility capable of accepting this waste.

These above ground dry casks are engineered to assist in cooling the spent fuel bundles while providing adequate shielding for the protection of plant employees as well as the surrounding community and environment.

Low-Level Radioactive Waste ("LLRW" - trash, tools, scrap, filtering media, irradiated hardware, etc.)

Similar to others in the nuclear power industry in the United States, over 95% of the LLRW generated by Plant Hatch and Plant Vogtle is sent for processing at Energy Solutions before it is disposed at either Energy Solutions burial site in Clive, Utah or Waste Control Specialist burial site in Andrew County, Texas. Plant Hatch and Plant Vogtle may store limited amounts of this waste on the site where it was generated inside concrete shields on a concrete pad until it meets NRC/U.S. Department of Transportation requirements for transportation and disposal.