Georgia Power

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241 Ralph McGill Boulevard NE
Atlanta, GA 30308-3374

PUBLIC DISCLOSURE

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 111 Greenhouse Gas Rules Semi-Annual Status Report; 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 Georgia Power Company ("Georgia Power", "GPC", or the "Company") is the semi-annual report regarding the 111 Greenhouse Gas ("GHG") Rules compliance strategy activities. The Company files this Report to update the Commission on the legal status of the 111 GHG Rules as well as the Company's compliance strategy activities through the period ending December 31, 2025. Enclosed are the trade secret and public disclosure versions of the Report made in accordance with the Commission's Alternative Electronic Filing Procedures issued on March 17, 2020.

This filing contains certain information that is being filed under the Commission's trade secret rules as explained in the enclosed document regarding the basis for the assertion. 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

Enclosure

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

111 GREENHOUSE GAS RULES
SEMI-ANNUAL STATUS REPORT
DOCKET NO. 56002

GEORGIA POWER COMPANY

BASIS FOR THE ASSERTION THAT THE INFORMATION SUBMITTED IS A TRADE SECRET

In accordance with the order of the Georgia Public Service Commission in Georgia Power Company's ("Georgia Power" or the "Company") 2025 Integrated Resource Plan ("IRP") in Docket No. 56002, Georgia Power hereby submits the 111 Greenhouse Gas ("GHG") Rules Semi-Annual Status Report ("Report"). In the Report, the Company has submitted details related to the current legal status of the 111 GHG Rules, their impact on the continued operation of Plants Bowen and Scherer, as well as the Company's actions, technical solutions, and estimated cost to comply with the rules (the "Information"). All such Information is considered trade secret information of the Southern Company, Georgia Power, and its affiliates and is therefore protected from public disclosure under Commission Rule 515-3-1-11.

The Information derives economic value from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. Specifically, the trade secret portions of the Information contain competitively sensitive details on the site-specific costs the Company is expected to incur to assess compliance with the 111 GHG Rules. Publicly disclosing these costs would allow bidders and vendors to tailor proposals according to the Company's expected costs to the detriment and harm of the Company and its customers. If revealed to the public, bidders and vendors could use the Information to set an artificial floor on bidding, thereby preventing the Company from conducting a proper solicitation and obtain the equipment and services at the best cost for future work. Disclosure of the Information could harm the Company and its customers in its efforts to obtain optimal pricing in current or future negotiations. In addition, the Company's competitors are not generally required to disclose similar information, and to require the Company to do so would put it at an economic disadvantage.

The Information is subject to extensive efforts to maintain its confidentiality. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the Information. Those personnel receive access only on a "need to know" basis. If a party outside of Georgia Power and Southern Company and their legal counsel are granted access to the Information, the party is required to sign a confidentiality agreement with respect to the Information.

Jennifer S. McNelly, first being duly sworn, deposes and states that she has reviewed the Report and that, to the best of her knowledge, the specific information designated as trade secret therein constitutes trade secrets pursuant to Article 27, Chapter 1, Title 10 of the Georgia Code.

Jennifer S. McNelly
Vice President, Environmental Affairs
Georgia Power Company

Subscribed and sworn to before me this 30th day of March 2026.

Notary Public

My Commission expires:



111 Greenhouse Gas Rules Compliance Semi-Annual Status Report

Georgia Power Company

March 31, 2026

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.

Georgia Power Company
111 Greenhouse Gas Rule Compliance
Semi-Annual Status Report
March 31, 2026

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111 Greenhouse Gas Rules Compliance
Semi-Annual Status Report
March 31, 2026

I. Background

Reporting Period: July 1, 2025 – December 31, 2025

Plant Sites Covered: Bowen and Scherer

Background: On May 9, 2024, the Environmental Protection Agency ("EPA") finalized the 111 Greenhouse Gas ("GHG") Rules for new and existing sources in the power sector. The rules require states to develop plans to establish performance standards for existing sources based on the "presumptively approvable" standards published by EPA. For existing coal-steam resources, compliance can be demonstrated by one of three pathways: (1) retire by 2032; (2) co-fire natural gas by 2030 and retire by 2039; or (3) install and operate carbon capture and storage ("CCS") by 2032 with no forced retirement date. As an outcome of the 2025 Integrated Resource Plan ("IRP") filed with the Georgia Public Service Commission ("GPSC") (Docket No. 56002), Georgia Power Company ("the Company") was authorized to pursue the natural gas co-firing pathway as the compliance strategy for Plants Bowen and Scherer. Per the stipulated agreement, the Company is filing this report to update the Commission on the status of the 111 GHG Rules and progress on the evaluation of the natural gas co-firing pathway for Plants Bowen and Scherer.

II. Regulatory

Current Legal Status of 111 GHG Rules:

The following updates on the legal status of the 111 GHG Rules reflect action since the last update the Company provided in the 2025 Environmental Compliance Strategy ("ECS") filed on January 31, 2025, through the semi-annual period ending December 31, 2025.

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, 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, EPA would repeal the emission guidelines for existing units, as well as the 90% CCS requirement for new combustion turbines ("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 in the 111 GHG Rules. These standards are numerical (lb CO2/MWh) limits that depend 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 spring 2026.

Impact on Continued Operation of Plants Bowen and Scherer:

If finalized as proposed, the repeal of the 111 GHG Rules would reduce compliance costs and influence the continued operation of Plants Bowen and Scherer. Both the primary and alternative repeal pathways eliminate requirements for modified operation and retirement of existing coal-steam units. For the Company, this repeal would mean avoiding costs to convert boilers to co-fire natural gas and coal, costs to build new gas laterals, and natural gas transportation costs expected in a co-firing scenario. In addition, without mandated retirement, replacement generation for coal-steam units will not be required to address the 111 GHG Rules. The repeal is expected to provide long-term customer cost savings by avoiding incremental environmental retrofit capital expenditures and deferring the need for higher-cost replacement capacity, while allowing continued operation of Plants Bowen and Scherer through the end of their useful lives.

III. Technical Solutions Overview and Compliance Actions

Summary of Technical Solutions Considered or Implemented:

The 111 GHG Rules offer multiple compliance pathways for existing coal units; however, the Company is evaluating the natural gas co-firing pathway consistent with the compliance strategy approved by the Commission. As the proposed repeal is not yet final and thus the 111 GHG Rules remain in effect, the Company must continue investing to assess this potential compliance pathway.

This technical solution consists of retrofitting the existing coal-fired boilers at Plants Bowen and Scherer with natural gas-fired burners. These burners would be added to and in some cases may replace some of the coal-fired burners in each boiler. Because the boilers could fire coal in a co-firing scenario, emissions controls to reduce emissions of nitrogen oxides, sulfur dioxides, particulate matter, and mercury would remain in service. Specific emissions controls are unique to each boiler and summarized in more detail in the Company's ECS filed on March 31, 2026.

The Company has engaged General Electric Vernova ("GE") to conduct engineering studies at Plants Bowen and Scherer to evaluate natural gas co-firing. In these studies, GE inputs

historical operating data into a computer model of each boiler retrofitted with natural gas burners to evaluate boiler operating and emissions performance. The Company has requested GE study two scenarios: 100% gas firing and another percentage equivalent to the minimum megawatt load for each unit. These two scenarios are important to understand unit performance across the operating range and provide flexibility while maintaining 111 GHG Rules compliance. The 111 GHG Rules' 40% co-fire presumptively approvable standard is determined on an annual heat input basis. Therefore, the study of a full gas-conversion scenario will evaluate the option where the Company could operate each unit on gas or coal while considering fuel costs and environmental compliance. At the time of this filing, GE has completed modeling of Plant Bowen units and continues preliminary modeling for the Plant Scherer units. The Company anticipates providing more detail on the results of the studies during the next semi-annual compliance report after reports are finalized.

In addition to boiler retrofits, another key component of the co-firing compliance pathway is gas infrastructure. At present, neither Plant Bowen nor Plant Scherer has gas service to the facility. Gas pipeline laterals to each site would need to be constructed as part of this compliance strategy. Construction of a gas lateral to Plant Bowen is planned to support the recently approved Units 7-8 combined cycle CTs. For both facilities, further evaluation would be required to determine gas supply and firm transportation ("FT") availability and timing to satisfy the 40% co-firing requirement. If the company were to conclude sufficient gas is not available to meet the presumptively approvable standard by 2030, the Company would pursue an alternate standard through the State Plan development process subject to EPA approval. Given the proposed repeal of the 111 GHG Rules, the Company is not currently seeking to secure FT or other gas contracts specifically for natural gas co-firing at Plants Bowen and Scherer.

IV. Capital Investment Forecast

With final action on the proposed repeal of the 111 GHG Rules pending, the Company has not and does not plan to invest significant capital to comply with the 111 GHG Rules for Plants Bowen and Scherer. The Company will complete the ongoing engineering studies to support the 111 GHG Rules compliance strategy.

The Company is deferring the costs of the engineering studies being performed by GE through preliminary survey and investigation ("PS&I"). A summary of the PS&I spend for the studies by plant is shown in Table 1.

Table 1: Deferred Costs for 111 GHG Rule Compliance

Facility	PS&I Spend for the Semi-Annual Period ($000)	Total PS&I Spend for 111 GHG Rules ($000)
Bowen	REDACTED	REDACTED
Scherer	REDACTED	REDACTED

After the engineering studies are complete, the Company will provide capital and operation and maintenance cost estimates, as available, for the co-firing compliance pathway in a future 111 GHG Semi-Annual Status Report.