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IN RE: GEORGIA POWER COMPANY'S 2026 DISTRIBUTED GENERATION REQUEST FOR PROPOSALS

ORDER APPROVING FINAL REQUEST FOR PROPOSALS DOCUMENTS

On May 7, 2026, Georgia Power Company ("Georgia Power" or "Company") filed the final drafts for Georgia Power's 2026 Distributed Generation ("DG") Request for Proposals ("RFP") including Pro Forma Power Purchase Agreements ("PPA") (Energy Only and Energy with Storage) for Georgia Public Service Commission ("Commission") approval. As approved by the Commission in its Order Adopting Stipulation in Docket No. 56002 ("2025 IRP Final Order"), Georgia Power will procure up to 100 megawatts ("MW") of new DG solar and solar plus storage through two RFPs of 50 MW each. Additionally, the 2025 IRP Final Order required that any unfulfilled MW in DG RFPs be carried over to future DG RFPs. The 2024 DG RFP concluded with the certification of approximately 70 MW from 16 projects leaving 180 MW unfulfilled which will be added to the 2026 DG RFP procurement target. The 2025 IRP Final Order also required a DG Working Group to reconvene with the goal to provide feedback to the Company and Staff in order to increase the success of this RFP.

The 2026 DG RFP seeks to procure approximately 230 MW of energy and storage capacity from solar photovoltaic (fixed-tilt or tracking) DG resources that may include storage devices with projects sized greater than 250 kW up to 6 MW. A project must interconnect to the Company's

distribution system. If the project is located outside of Georgia Power's service territory, a three-party agreement with the service territory's electric service provider (e.g., an Electric Membership Cooperative ("EMC") or municipality) will be required. All Environmental Attributes produced by or related to the project must be bundled with the energy procured through this DG RFP.

Accion Group, LLC was selected by the Commission as the Independent Evaluator ("IE") for this solicitation. All communications and submission of bids will be through https://pro.accionpower.com/gpcdgrfp26/summary/ ("IE Website"). The evaluation of the bids received will primarily focus on a bid's economic net benefits, but other qualitative and non-price attributes, such as project development experience, prior contracting experience, and use of union labor will be considered, especially where one or more bids are otherwise equally valued.

Bidders are required to submit with each bid a non-refundable "Bid Fee" of $6 per kW ($6,000/MW). There will also be a Winner's Fee of up to $200,000 per submission assessed on a pro rata basis based on each winning submission's total projected revenue relative to the aggregate total projected revenue of all winning submissions to cover the IE cost and a portion of the costs to administer this DG RFP. The Bid Fee is an increase from the 2024 DG RFP Bid Fee of $4/kW. The Winner's Fee is also a modified amount when compared to the 2024 DG RFP Winner's Fee of $10/kW. As stated in Georgia Power's recent announcement on the IE Website: "Bid fees have remained flat for three IRP cycles (10 years) despite increasing costs of administering the RFP. Increased focus on the costs and benefits of renewable procurements in the current Georgia Power fuel case have informed the Company's decision to try to align the DG RFP bid fees more closely with the costs to administer the RFP."

Bidders can elect a term of 15, 20, 25, 30, or 35 annual periods for solar projects and 15 or 20 annual periods for storage projects. Once a bid is submitted, the bidder will not be allowed to adjust the PPA term length. For the evaluation of proposals with unequal contract term lengths, the Company will utilize its projected avoided costs to evaluate bids on an equivalent basis. This method is consistent with what was done in prior RFPs. Following the initial Net Benefit ranking, Georgia Power, Commission Staff ("Staff"), and the IE will review the Solar weighted Projected Avoided Costs for a single Georgia Power generic single axis tracking solar profile modeled in one or more Georgia Power planning scenarios (e.g., MG0, HG0, MG20, etc.) relative to the initial

Net Benefit ranking to determine the Best Cost Threshold. This will determine the bids that move forward. Once the Best Cost Threshold is determined in coordination with Staff and the IE, bid rankings will be finalized. For each unique bid submitted, a bidder will be permitted to provide one levelized pricing option and one escalating pricing option for one bid fee. Additionally, a bid for a project with a storage device and an alternative bid without a storage device will be subject to a single bid fee.

The DG Working Group met three times between October 2025 and January 2026. At the first meeting, the key changes and updates to the DG RFP process were discussed including the addition of storage, various pricing and cost metrics, and the integration of Distributed Energy Resource Management Systems ("DERMS"). The second meeting focused on transmission modeling, power factor methodology, Automatic Generation Control ("AGC") requirements, and curtailment parameters. The third meeting dove deeper into previously discussed issues, especially AGC and DERMS integration, and new topics such as the potential high limit ("PHL") methodology, the timing of the RFP, and Variable Interest Entity ("VIE") concerns. DG Working Group Members raised four key policy issues that needed to be addressed in the Final RFP and PPA documents: (1) Mechanical Completion; (2) Clear definition regarding Curtailment; (3) PHL and Curtailment Compliance; (4) AGC Status Performance Requirements and AGC Setpoint Response Performance Requirements.

On January 21, 2026, draft RFP and PPA (Energy Only and Energy with Storage) documents were posted to the IE Website to allow potential bidders the opportunity to submit comments and offer revisions to the documents. The 2026 DG RFP and PPA documents contain significant revisions when compared to the Final Approved 2024 DG RFP and PPA documents. For the 2026 DG RFP, significant changes include: the ability to add a storage option with the bid, inclusion of a locational transmission value for evaluation of bids in different areas of the state, and the requirement to communicate with DERMS via AGC to allow scheduling and curtailment of project energy.

On January 27, 2026, Georgia Power conducted an online Bidder's Conference for potential Bidders and interested parties to discuss the 2026 DG RFP process and draft RFP Documents with Georgia Power, Staff, and the IE. There were 33 attendees that participated. On February 27, 2026,

the comment period closed. There were several parties that provided 113 comments regarding the draft documents: RFP (17), PPA (Energy Only) (84), and PPA (Energy with Storage) (12). Each of the comments received were reviewed by Staff, Georgia Power, and the IE and responses to the comments were provided by the IE to every commenter. Georgia Power made significant revisions to all three documents, particularly to the PPA (Energy Only) with the goal of responding to the current market and increase the likelihood of success of the RFP.

Commenters provided robust feedback on the RFP and PPA documents with a few key areas emerging as significant issues. Commenters requested changes to the definition and calculation of curtailment and requested clarity regarding how compensable curtailment will be determined. The use of a PHL is a new parameter for this RFP as AGC and DERMS are implemented. Commenters raised concerns regarding the calculation and use of PHL and requested clarity for payment and usage cases. The AGC status and setpoint performance requirements creates new conditions for bidders to understand and meet as DERMS is implemented. Lastly, commenters stated that the requirement of having a functional AGC system to achieve mechanical completion should be moved to after COA. Commenters stated that these issues substantially increased the risk of the projects and potentially challenge their ability to acquire financing (tax equity).

On May 7, 2026, the final draft of the RFP and PPA (Energy Only and Energy with Storage) documents were posted to the IE website and filed with the Commission for consideration and approval. The following significant changes were incorporated into the final draft documents:

- Modified the RFP Schedule to allow more time for bidders to review the new parameters of the RFP.
- Extended the Required Mechanical Completion Date an additional 60 days to 365 days after Certification to allow for DERMS integration.
- Added additional clarity on deemed delivered energy and compensable curtailment section based on developer feedback.
- Reduced the required timeframe for both Georgia Power and the Generator for maintaining electronic records of the quantities of energy delivered to a minimum of six years after creation of the record or data and for any additional period required by applicable law or a governmental authority.

- Revised AGC and Facility Minimum Data Requirements to only require critical data points.
- Modified the requirement of commissioning of the AGC system to be at witness testing instead of at mechanical completion.
- Added language to inform the generator of their performance of the AGC metric.
- Increased the maximum allowed timeframe for an Extended Force Majeure Event ("FME") from 6 months to 12 months.
- Updated the Interconnection Cost Methodology to address costs for DERMS telemetering equipment.
- Reduced the minimum number of cycles for the BESS from two per day to one.
- Relaxed the RMSE limit for AGC performance for the first two annual periods (RMSE – 1st Annual Period: 15, 2nd Annual Period: 10, Remainder of Term: 5).

Georgia Power also included a table of effective load carrying capability ("ELCC") values in Exhibit J of the RFP document. The table lists values for incremental additions of storage device capacity of various durations for a solar facility paired with a storage device which are used in the Company's evaluation of storage submissions. The inclusion of the ELCC table in the RFP document is intended to give RFP participants guidance on the valuation of storage facility submissions.

Staff reviewed the final draft 2026 DG RFP and PPA (Energy Only and Energy with Storage) documents in which several concerns raised by the DG Working Group were addressed. Staff recommended approval of the ELCC values listed in Exhibit J of the 2026 DG RFP document which provides values for the incremental additions of storage device capacity of various durations for a paired facility. Staff will continue to study ELCC values and determine whether changes need to be incorporated for future RFPs. Staff recommended that the Company be required to perform ELCC studies for thermal units for use in future RFPs. Staff also recommended approval of the final draft RFP documents with the following modifications:

1. Energy Only PPA: Exhibit H and Energy with Storage PPA: Exhibit J - Modify the language below the RMSE Requirement table to read, "If, after Generator has used commercially reasonable efforts to implement an approved AGC Plan in accordance with Section 6.6 (AGC Performance Requirements), the Facility continues to fail to

satisfy the applicable RMSE requirement, the Parties will mutually agree to a relaxed RMSE requirement that reasonably reflects the demonstrated operating capabilities of the Facility. Designated representatives from each Party must: (i) agree to any adjustment, which agreement must not be unreasonably withheld, conditioned, or delayed; and (ii) document any adjustment."

2. Energy Only PPA and Energy with Storage PPA - Delay AGC and PHL testing for up to 1 year after provisional COA so long as seller pays the cost of additional testing.
3. Energy Only PPA: Exhibit I and Energy with Storage PPA: Exhibit K – Adding the following language to read, "This Exhibit [I] (AGC and Facility Minimum Data Requirements) establishes the minimum data point requirements that the Facility and its AGC system must be designed and configured to communicate. AGC performance requirements are established separately in PPA Section 6.6 (AGC Performance Requirements) and Exhibit [H] (AGC Performance Metrics and Requirements)."

The Commission approved Staff's recommendation at the May 21, 2026 Administrative Session.

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WHEREFORE IT IS ORDERED that the final draft 2026 Request for Proposals, Pro Forma Power Purchase Agreements (Energy Only and Energy with Storage), as modified by Staff's recommendation, are hereby approved.

ORDERED FURTHER, that Georgia Power Company shall be required to perform ELCC studies for thermal units for use in future Request for Proposals.

ORDERED FURTHER, that all findings, conclusions, statements, and directives made by the Commission and contained in the foregoing sections of this Order are hereby adopted as findings of fact, conclusions of law, statements of regulatory policy, and orders of this Commission.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 21st day of May 2026.

Sallie Tanner
Executive Secretary

5-22-26
Date

Jason Shaw
Chairman

5-22-26
Date