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Docket # 43083
Document # 228260

COMMISSIONERS:

JASON SHAW, Chairman
LAUREN "BUBBA" McDONALD, Vice-Chairman
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DR. ALICIA M. JOHNSON
TRICIA PRIDEMORE

REECE McALISTER
EXECUTIVE DIRECTOR

SALLIE TANNER
EXECUTIVE SECRETARY

Georgia Public Service Commission

(404) 656-4501
(800) 282-5813

244 WASHINGTON STREET, SW
ATLANTA, GEORGIA 30334-5701

FAX: (404) 656-2341
psc.ga.gov

September 1, 2026

Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company
Regulatory Affairs Bin 10230
241 Ralph McGill Blvd., N.E.
Atlanta, Georgia 30308-3374

RE: Docket No. 43083 / Georgia Power Company's Semi-Annual Coal Combustion Residuals Asset Retirement Obligation (CCR-ARO)

Data Request from Commission Staff (STF-CCR-12)

Dear Mr. Haswell:

Enclosed herewith, please find Commission Staff Data Request **STF-CCR-12.** Georgia Power's initial responses to this Data Request package are requested as soon as possible, but not later than **October 1, 2026.**

If you have any questions concerning this transmittal, please call me at 404-656-7420.

Sincerely,

Steve Roetger
Construction Monitoring Manager

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	**)**	
	)	**Docket No. 43083**
Georgia Power Company's	**)**	
Semi-Annual Coal Combustion Residuals	**)**	
Asset Retirement Obligation (CCR-ARO)	**)**	

STAFF'S TWELFTH SET OF DATA REQUESTS TO GEORGIA POWER COMPANY

Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company
Regulatory Affairs Bin 10230
241 Ralph McGill Blvd., N.E.
Atlanta, Georgia 30308-3374

COMES NOW the Staff of the Georgia Public Service Commission ("Commission") and, pursuant to the authority vested in it by the Commission pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), **to be answered under oath** by designated representatives or agents of Georgia Power Company. Staff requests that a complete set of the responses and supporting documents be filed with the Commission's Executive Secretary in the manner set forth in Utility Rule 515-2-.04(4). Staff requests that an original and five (5) copies be filed with the Executive Secretary of the Commission. **Accompanied therewith shall be an electronic version of the filing, which shall be made on a 3 ½ inch diskette or a CD ROM containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.** As contemplated by law, responses to these Data Requests are expected from Georgia Power Company on or before **October 1, 2026.**

DEFINITIONS

As may be used in this document:

1. "The Company," "Georgia Power" or "The Utility" means Georgia Power Company and its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of said Company.

2. The term "you" and "your" refer to "the Company."

3. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

4. The term "document" or "documentation" shall have the broadest possible meaning under applicable law. "Document" or "documentation" means every writing or record of every type and description that is in the possession, custody or control of the Company including, but not limited to, correspondence, memoranda, e-mails, drafts, workpapers, summaries, stenographic or handwritten notes, studies, notices, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" or "documentation" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, chart projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

5. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

6. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of

these discovery requests any information that would not otherwise be brought within their scope.

7. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

8. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.

9. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

a) the type of document (e.g., letter, memorandum, etc.);

b) the date of the document; the title or label of the document;

c) the Bates number or other identifier used to number the document for use in litigation; the identity of the originator;

d) the identity of each person to whom it was sent;

e) the identity of each person to whom a copy or copies were sent;

f) a summary of the contents of the document;

g) the name and last known address of each person who presently has possession, custody or control of the document;

h) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

10. "Identify", "identifying" or identity" when used in reference to a communication should be read to include information regarding the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
    a. the privilege asserted and its basis.
    b. the nature of the information withheld;
    c. the subject matter of the document, except to the extent that you claim it is privileged.
2. **The answers provided should first restate the question asked and also provide the name of the Company employee(s) or agents responsible for compiling and providing the information contained in each answer.**
3. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
4. If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
5. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.
6. **If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:**
    a) the privilege asserted and its basis.
    b) a log should be provided identifying starting and ending bates numbers.
    c) the nature of the information withheld;
    d) the subject matter of the document, except to the extent that you claim it is privileged.
    e) a description of the document to which the privilege applies.

Question 1 please reference the document titled GPC CCR Portfolio Monthly Review Meeting.

STF-CCR-12-1 During the Teams meeting dated Thursday July 23, 2026, the Company stated that it undertook a comprehensive re-evaluation of ash quantities across the Company's sites and impoundments that resulted in a baseline of quantities as of the 3rd quarter, 2025. Please respond to the following:

a. What facts did the Company rely on to determine the need for this re-evaluation of the ash quantities?
b. What were the changes in means and methods used to develop the 3rd quarter, 2025, ash impoundment quantities such that the accuracy and confidence of these estimates improved?
c. Please provide a table by site and impoundment of the estimated ash quantities assumed prior to the 3rd quarter, 2025, and the estimated ash quantities that were developed because of the 3rd quarter, 2025, re-evaluation. Calculate the increase or decrease between the two estimated ash quantities.
d. Staff identified sites Kraft, McIntosh, and McManus in the Company's Semi-annual Report as of December 31st, 2025, that were not included in this document. Please provide the CCR removal data for these three sites.
e. Please refer to page 4.
    i. Under the Top Surveillance Types bar chart please define the x-axis.
    ii. Under the Top Noncompliant Behaviors bar chart please provide the root cause or causal analysis(es) that explains the CCR-Fill Placement Noncompliant Behaviors.
    iii. Contractually, which party's Quality Assurance Program(s) govern i.e. Contractor; Company; both; etc…
f. Please refer to page 5. Based on Staff's interpretation of the slide, behavioral observations were taken of site personnel. The Contractor performed 16% of the observations; the Company performed 84% of the observations. Please respond to the following:
    i. Please define the population of personnel being observed i.e. Contractor; Company; both; etc…
    ii. Contractually, which party is responsible for site personnel behaviors?

iii. Contractually, which party is responsible for performing the quality surveillances?

g. Please refer to page 9. Please provide Staff in Excel format (please retain all formulas) with ash quantities by all sites and impoundments that correspond to the budget, actual, and forecast figures for each year in the forecast i.e. please do not combine 2031-2039 or any other grouping of years. Additionally, for this spreadsheet response break out the Post-Closure Sites by site and year.

h. Please provide all assumptions, analyses, references, calculations, and narrative explanations for the derivation of the Estimate to Complete escalation forecast amount of $1,873 million. Please provide this information in its native format with all formulas intact.

i. Please confirm that the escalation figure is a non-accounting estimate that ultimately flows through actual costs as they are spent i.e. escalation costs are incurred as actual costs are paid. If not, provide the accounting treatment accompanied by all authoritative GAAP literature that substantiates the Company's treatment.

j. Please spell out the following acronyms and provide a brief explanation of each:
   i. CQS p 5;
   ii. CQA p 5;
   iii. QSS p 5;
   iv. FEP p 7.

STF-CCR-12-2 Please provide Staff in Excel format (please retain all formulas) with ash quantities by all sites and impoundments that correspond to the budget, actual, and forecast figures submitted in the Company's Semi-annual Report as of December 31st, 2025.

STF-CCR-12-3 Please provide the budget, actual, and forecast information in Excel format (please retain all formulas) that accompanied the Company's Semi-annual Report as of December 31st, 2025, for each year in the forecast i.e. please do not combine 2029-2031; 2032-2034; 2035-2073.

STF-CCR-12-4 Please provide Staff with all current governing Change Control Program policies and procedures.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff's Data Request STF-CCR-12** in the above-referenced docket was filed with the Commission's Executive Secretary, an electronic copy of same was served upon all parties and persons listed below via electronic mail, or unless otherwise indicated, as follows:

Sallie Tanner
Executive Secretary
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.ga.us

Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company
Bin 10230
241 Ralph McGill Boulevard, NE
Atlanta, GA 30308-3374
JHASWELL@southernco.com

Brandon Marzo
Troutman Pepper Hamilton Sanders LLP
600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308-2216
brandon.marzo@troutmansanders.com

Antonio Elera, Staff Attorney
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
aelera@psc.ga.gov

So certified, this 1st day of September 2026.

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Steve Roetger
Construction Monitoring Manager