Georgia Power

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

PUBLIC DISCLOSURE

September 30, 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 is filing 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 June 30, 2026. 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 basis of assertion. If you have any questions, please call Steven Huling at 404-506-1366.

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.

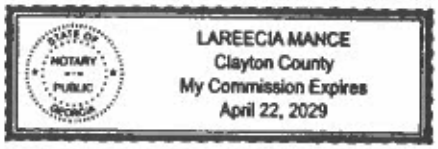
Jennifer S. McNelly, first being duly sworn, deposes and states that she has reviewed the Report and that, to the best of her knowledge, the specific information designated as trade secret therein constitutes trade secrets pursuant to Article 27, Chapter 1, Title 10 of the Georgia Code.

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

Subscribed and sworn to before me this 24th day of September 2026.

Notary Public

My Commission expires:



111 Greenhouse Gas Rules Compliance Semi-Annual Status Report

Georgia Power Company

September 30, 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 greenhouse gases; 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
September 30, 2026

Table of Contents

I. Background 4
II. Regulatory 4
III. Technical Solutions Overview and Compliance Actions 5
IV. Capital Investment Forecast 6

Georgia Power Company
111 Greenhouse Gas Rules Compliance
Semi-Annual Status Report
September 30, 2026

I. Background

Reporting Period: January 1, 2026 – June 30, 2026

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 Semi-Annual Status report.

- 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. 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 2024 111 GHG Rules. These standards are numerical (lb CO2/MWh) limits that depend on the capacity factor and fuel mix of the individual source.

- On September 17, 2026, EPA published two actions. The first action is a final rule, to be effective November 16, 2026, that repeals GHG emissions standards for existing fossil fuel-fired units and the CCS requirements for new CTs. In its second action, EPA published a supplemental proposal to repeal the remaining GHG emissions standards for electric generation units, including the efficiency-based standards for new CTs from the 2024 111 GHG Rules and the 2015 GHG Rule.

Impact of GHG Rule Repeal on Continued Operations of Plants Bowen and Scherer:

In its final rule, EPA repealed the requirements that affect the coal-steam units at both Plants Bowen and Scherer; therefore, there is no longer a need to plan for these units at Bowen and Scherer to comply with one of the aforementioned presumptively approvable standards. As a result of the repeal of these requirements, the Company will avoid 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. This action 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 has been evaluating the natural gas co-firing pathway consistent with the compliance strategy approved by the Commission. As the final partial repeal was not issued until recently, the Company has continued to assess this compliance pathway during the semi-annual period.

This technical solution consists of retrofitting the existing coal-fired boilers at Plants Bowen and Scherer with natural gas-fired burners. 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.

As discussed in the Semi-Annual Report 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. Since that report was filed, GE has communicated updates on the progress of these studies for Plant Bowen Units 1-4 and Plant Scherer Unit 3. The scope of these studies is to evaluate 100% capacity on gas to maximize flexibility and compliance margin with EPA's presumptively approvable standard. GE expects to issue final reports for these studies in the coming months.

Work on the Plant Scherer Units 1 & 2 study has also begun but is at an earlier stage. Due to the lack of gas supply at the site, the Company has requested GE evaluate 40% gas availability, the EPA presumptively approvable standard, for Units 1 & 2.

GE has provided the Company with indicative pricing on a per unit basis for both Plants Bowen and Scherer to implement natural gas co-firing. The pricing provided by GE summarized in Table 1 is for equipment and GE engineering only and does not include other construction costs, labor, and contingency. In addition, the cost estimates do not include gas infrastructure, including pipeline laterals, firm transportation contracts, or increased fuel costs compared to 100% coal firing.

Table 1: Indicative Equipment Pricing for Natural Gas Co-firing

Gas Availability	Cost ($ Million/unit)
40%	REDACTED
100%	REDACTED

At present, the Company does not have operation and maintenance cost estimates for the co-firing compliance pathway.

Gas infrastructure remains an important component to support natural gas co-firing. Since the last Semi-Annual Report, the status of gas infrastructure at both sites remains the same. A gas lateral to Plant Bowen is planned to support the recently approved Units 7-8 combined cycle CTs, but there is not any gas infrastructure currently planned for Plant Scherer. The Company is not currently seeking to secure firm transportation ("FT") or other gas contracts specifically for natural gas co-firing at Plants Bowen and Scherer.

IV. Capital Investment Forecast

With final repeal of the existing coal unit emissions guidelines in the 111 GHG Rules, 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 plans to complete the ongoing engineering studies to support the Commission approved compliance strategy from the 2025 IRP and ECS.

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 2.

Table 2: Deferred Costs for 111 GHG Rule Compliance

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