Georgia Power

GPC CCR Program

G-CCR-G-PC-05-Change Management Guideline-Rev 5

Change Management Guideline

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1.0 Purpose and Scope

1.1 Purpose

The purpose of this document is to establish the requirements for the identification, recordkeeping, and notification of project change for project management and control.

1.2 Scope

This guideline applies to all projects within the Georgia Power Company (GPC) Coal Combustion Residuals (CCR) Program (the Program). This document supersedes TSS Guideline TPS-PC-01 – Change Management.

2.0 Definitions and References

2.1 Abbreviations

- ARO Asset Retirement Obligation
- CAP Current Approved Plan
- CBS Cost Breakdown Structure
- CCB Change Control Board
- CCR Coal Combustion Residuals Program (CCR Program)
- CCR or COR Contractor Change Request (former), renamed to COR Contractor Change Order Request
- CM Change Management
- CPT Construction Productivity Tracking
- DOW Division of Work
- EA Environmental Affairs
- EAC Estimate at Completion
- FWA Field Work Authorization
- GPC Georgia Power Company
- MR Management Reserve
- MRB Managing Review Board
- MWO Maximo Work Order (also referred to as Task / Level 4 CBS)
- PfM Portfolio Management
- PM Project Manager
- PMO GPC CCR Program Management Office
- PMT Project Management Team
- PO Purchase Order
- PSC Public Service Commission
- SCS Southern Company Services
- SSJ Sole Source Justification
- TSS Technical Shared Services

2.2 References

- GPC CCR Program References – GPC CCR ARO Program Library

- G-CCR-S-AD-02-Program Approval Matrix Rev6
- G-CCR-S-PC-40-CBS Dictionary
- G-CCR-S-OR-02-Program Management Plan
- G-CCR-S-OR-03-GPC Change Control Board Charter
- G-CCR-T-PC-26-CCB Presentation Template
- G-CCR-G-PC-30-CCR Contingency and MR Guideline
- G-CCR-G-PC-01-CCR Cost Budgeting and Forecasting Management Guideline
- G-CCR-G-OS-04-CCR Risk Management Guideline
- G-CCR-G-OS-0-CCR Schedule Management Guideline
- G-CCR-G-PC-41-CCB Checklist
- G-CCR-G-PC-04-Change Management Process Flow
- G-CCR-T-PC-24-Change - Supporting Detail Template
- G-CCR-J-PC-22-Monthly Cost Checks Job Aid
- Change Management Form

SCS TSS References:

- TSS Procedure, CO-CS-3K, Field Work Authorizations
- TPS-PC-01 - Change Management

3.0 Roles and Responsibilities

1. GPC CCR Program Management Office (PMO):

    1. Support the establishment of enhanced change processes and templates.

    2. Coordinate with the Change Control Board (CCB) to provide guidance on project changes or decisions per the *Program Approval Matrix.*

    3. Test assumptions behind change estimates.

    4. Perform spot checks on the accurate completion of the Program's change management process.

    5. Assess whether the Program implementation is complying with change management requirements.

    6. Approve corrective actions relating to the implementation of program improvement needs.

    7. Set project change readiness standards for CCB presentations and hold project teams accountable to those standards.

2. The SCS Portfolio Management (PfM) function will:

    1. Provide guidance to PMT on the timing of schedule updates.

    2. Review changes in a timely manner as determined in the *Program Approval Matrix*.

    3. Ensure adherence to the program change management process and usage of forms/templates, including CCB Charter requirements (*CCB Checklist*, *CCB Presentation Template*, and materials timing).

    4. Manage CCB meetings.

    5. Monitor quality of change management application by the PMT.

    6. Evaluate project specific issues or opportunities for program application.

    7. Review the scope of all requests for changes.

    8. Review recommended funding for changes.

    9. Review corrective actions relating to the implementation of program improvement needs.

    10. Provide all necessary documents and support in connection with PSC filings and submittals, or as directed by PMO.

    11. Track and report approved changes.

    12. Spot check that approved changes are adequately implemented.

3. The Project Management Team (PMT) will:

    1. Identify and record project changes in accordance with program change management process.

    2. Assist other PMT members in quantifying and qualifying the impact of changes.

    3. Record details of changes or decisions in systems of record.

    4. Review and approve changes in a timely manner as determined in the *Program Approval Matrix*.

    5. Evaluate and recommend funding approaches.

6. Evaluate alternative approaches to addressing change.

7. Adhere to guidelines, procedures, and templates, including CCB Charter requirements (*CCB Checklist, CCB Presentation Template*, and materials timing).

8. Develop and propose corrective actions relating to the implementation of project improvement needs.

9. Implement approved changes.

4. The CBS code owner will:

1. Identify and document changes using CM forms.

2. Respond to requests for additional information or clarification related to changes documented and submitted for review.

3. Ensure completeness and accuracy of CM forms, CCB presentations, *CCB Checklist*, and backup documentation.

4. May elect to delegate some of the work to project team members, but the CBS code owner is still ultimately responsible for ensuring the accuracy and closeout of the change.

5. Ensure the *CCB Checklist* has been reviewed/completed and the PMT PM is adequately prepared to present the change to the CCB.

5. The PfM leadership will:

1. Review and approve changes within thresholds according to the Program Approval Matrix.

2. Determine and approve appropriate funding mechanisms for changes.

3. Prioritize review based on urgency of the change.

4. Review changes in a timely manner such that project teams may effectively manage their scope.

5. Approve CM forms in a timely manner in Unifier.

6. Escalate items as appropriate to CCB and PMO.

6. The Change Control Board (CCB) will:

    1. Review and approve changes above the thresholds according to the *Program Approval Matrix.*

    2. Determine and approve appropriate funding mechanisms for changes.

    3. Prioritize review based on urgency of the change.

    4. Review changes in a timely manner such that project teams may effectively manage their scope.

    5. Approve CM forms in a timely manner in Unifier.

    6. Comply with CCB Charter.

    7. Escalate items as appropriate to PMO and Managing Review Board (MRB).

    8. Provide recommendations for changes to the process to PfM and have them approved by PMO.

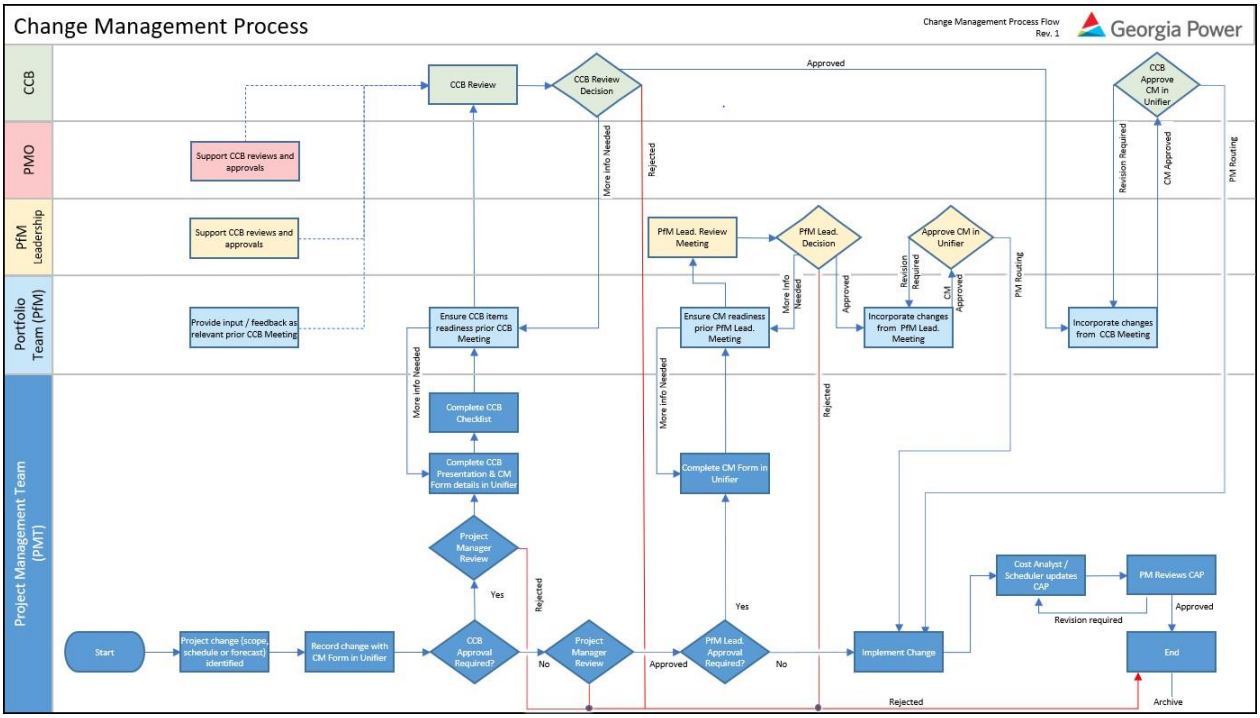
4.0 Change Management Guideline

The *Change Management Guideline* applies to all projects in each estimate phase. The level of detailed documentation required varies based on the level of project estimate certainty. A project is defined as each one of the ash ponds and each one of the landfills being executed within the scope of the CCR program.

4.1 Process Overview

For details on the division of responsibilities and how the above roles interact within the change management processes, see *Figure 1: Change Management Process Flow.*

Figure 1: Change Management Process Flow



4.2 Change Identification

A thorough understanding of project scope is necessary for identifying and initiating the change management process. A project change is defined as any modification which deviates from the project baseline and makes changes to project scope, cost (including cash flow changes), or schedule. Changes need to be identified and reported as soon as possible with the best information available at the time. Change management should not be applied to prior (actualized) periods.

Cash flow change is defined as the difference in the amount and timing of cash inflows and outflows within a specific cost code. Cash flow changes can be caused by a variety of factors, including changes in schedule, quantities, scope, revenue, expenses, or subcontractors' terms.

Project changes are to be recorded, evaluated, and submitted to PMT, PfM, PfM leadership, and/or CCB for review and approval in accordance with change management and approval thresholds defined in the *Program Approval Matrix*. It is recommended that CM forms be prepared on a quarterly basis to collect any pending variances or any relevant trend that, at PMT PM's discretion, is required to be added to the forecast/CAP. When the sum of the accumulated variances reaches the thresholds defined in the *Program Approval Matrix*, a CM form should be prepared and presented for the respective approval.

Once a change has been identified, key details about the change must be documented by the CBS code owner or their approved delegate, such as the following:

- What the scope of the new or revised activity is and the processes it affects?
- Who will be involved in and performing the activity?

- Where the activity happens and any impacts to plant sites?
- When and how long the new activity duration will be and the forecasted change to the current project schedule (including related cost impacts)?
- Justification and purpose for the proposed change and any variance explanations.
- Updated actual cost and schedule impacts and reconciliation/updated changes, if different than initially identified and approved.

See *Program Approval Matrix* for thresholds for CCB review and approval.

4.3 Current Approved Plan (CAP)

Current approved plan (CAP) is defined as the **PSC submittal plus any approved** change management (CM Form) in Unifier. All projects will actively maintain a financial budget (based on most recent PSC submittal), a CAP and an EAC. CAP will be updated monthly to include all CM forms that are approved by the date identified on the program cost calendar.

4.4 CBS Code Owner

CBS code owners are the accountable party, and their approved delegates are the responsible party. The CBS code owner must ensure that all required change information is provided even if the CBS code owner delegates the populating of such information.

4.5 Project Change Documentation

All changes need to be recorded in a timely manner and documented by the CBS code owner using a CM form in Unifier and submitted for approval to the appropriate authority as per the thresholds defined in the *Program Approval Matrix*.

4.6 Monthly Project and Program Change Summary

The PfM is responsible for presenting a monthly summary of project changes raised by each site during the prior month, including changes that did not require CCB approval. This report will be for information purposes only and will be included as part of the monthly portfolio review meetings. The report will include details on the number of changes, type of change, funding source, and total impact of the change.

4.7 Contractor Change Order Requests

Contractor change order requests (COR) must be submitted in accordance with the respective contract terms. Such COR may result in project cost and/or schedule changes requiring change management. If the request does not conform to the requirements defined in the associated contract, the request should be rejected and feedback on the reason for the rejection should be provided to the contractor concurrent with the notice of rejection. The COR should not be accepted without appropriate approvals of the changes resulting from the COR. When a COR results in cost and/or schedule changes, change management is required and (the associated COR to be referenced in the CM form) shall be performed as defined in this document prior to approving the COR. Once the COR (or variation thereof) is approved by means of the CM form, a field work authorization (FWA) shall be

issued to the contractor. For clarity, approval of the CM form does not overrule any other approval, process, or procedure requirement prior to issuing the FWA (i.e., SSJ increase approvals).

A fully executed FWA is required for construction contracts prior to payment for the additional work. As applicable, the FWA shall refer to the COR. If either cost, schedule, or scope of the change is not already covered in the appropriate purchase order (PO), the PO must be revised to capture the increased cost, schedule, or scope, or a new PO should be issued prior to performance of the work. Reference *TSS Procedure, CO-CS-3K, Field Work Authorization* for requirements, as well as the contract terms for which the COR was submitted.

New MWOs/tasks may be required to track the costs associated with the COR and associated existing budget, if in place, to the correct PO. The contract administrator shall work with the SCS PfM cost representatives and the PMT PM to determine what approvals are required, if the COR is already funded in the budget, and if new MWO/tasks are needed for the COR. If a new MWO/task is required, change management is required to transfer the budget from the existing MWO/task to the new MWO/task.

4.8 Change Management Form Details

All fields should be completed throughout the CM form's lifecycle as implemented in the Unifier change management system.

4.9 Calculating Change Cost Impacts

Project changes should be documented based on the best available information when submitting a CM form. It is acceptable to create a CM form prior to having final change values, but they should be updated once final information is available. If a CM form is approved with a preliminary estimation and the final amount has a greater than +/-10 percent change from the preliminary estimation, the CM form must be updated, or a new CM form is required.

4.10 Change Management Backup Information

CBS code owners or their delegate shall complete a *Change–Supporting Detail Template* spreadsheet for any change which results in a cost change and is not otherwise captured in the line-item detail of a CM form. The *Change Supporting Detail Template* documents detail the full extent of dollar movement by month and by task level.

4.11 Change Management Review and Approval

Changes shall be assessed based on the *Program Approval Matrix* to determine whether they only require PMT PM review and approval or whether additional review and approval is required by the PfM leadership or CCB. Some projects may also require additional approval by plant management or their delegates. These requirements shall be documented in the project implementation plan when applicable.

4.11.1 Change Management Review

Once ready for review, the CM form shall be routed to the appropriate PMT PM for review. The PMT PM is required to review and approve all CM forms related to their projects.

PMT PMs are responsible for reviewing the details of the CM form and determining any actions required as to the funding of such changes, in consultation with the PfM. PMT PMs shall inform the PfM of new CM forms that require PfM leadership or CCB approval.

If, during the review process, the PMT PM requires additional information, they must notify the CBS code owner to provide such information for them to be sufficiently informed to complete their review. The CBS code owner is accountable for the documentation of changes in the CM form and should also review the details of the change for completeness. Once the CM form is deemed complete by the PMT PM, it should either be approved by the PMT PM or routed for PfM review for those that need PfM leadership or CCB approval, as defined in the *Program Approval Matrix*.

For CM forms requiring PfM leadership review, the CBS code owner shall ensure that the *Change Management Form* has been reviewed/completed and the CBS code owner, with PMT PM support, is adequately prepared to present the CM form to PfM leadership.

For CM forms requiring CCB review, the CBS code owner shall ensure the *CCB Checklist* has been reviewed/completed and the CBS code owner with PMT PM support is adequately prepared to present the CM form to the CCB using the *CCB Presentation Template* and shall route the CM form for PfM review. PfM reviews occur regularly every other week, usually three (3) business days before the CCB meeting. Once the PfM reviews the CM form, it will mark it for CCB review and include it in the CCB agenda, as described in section 4.11.4.

The *CCB Checklist* and the *CCB Presentation Template* can be used to help CBS code owners and their delegates meet the above requirements.

Standard guidelines for the PfM leadership and CCB review cycle are outlined in the following sections.

4.11.2 PfM Leadership Review

PfM leadership has the responsibility to evaluate and either approve or reject changes to budgets and schedules based on the *Program Approval Matrix*. The primary goal of the PfM leadership review process is to review identified items prior to submitting to the GPC EA program management office (PMO) to verify and validate deliverables are accurate and consistent for all projects across the portfolio.

4.11.3 CCB Review

The CCB has the responsibility to evaluate and either approve or reject changes to budgets and schedules based on the *Program Approval Matrix*.

4.11.4 CCB Review Meeting Agenda

CM forms which meet the CCB criteria in the *Program Approval Matrix* are reviewed in regularly held CCB review meetings, currently occurring every other week. Once the CM form (and presentation) is marked ready for CCB review by the PfM, the CCB administrator will add it to the next scheduled CCB meeting agenda and confirm with the CBS code owner and the PMT PM that the CM form is ready for review. The CCB administrator will confirm the upcoming CCB review meeting date, time, and attendees from the project.

4.11.5 CCB Presentation Preparation

In preparation for the CCB review meeting, the CBS code owner must complete the *CCB Checklist* and prepare the CCB presentation. The *CCB Checklist* must be reviewed/completed by the CBS code owner and reviewed with the PMT PM to ensure that appropriate CM form information is ready to present to the CCB and contains the required elements.

The CCB presentation will be developed and presented by the CBS code owner with support from the PMT PM in the CCB review meeting. The CCB presentation will include a summary of the request, the change management request, the completed *CCB Checklist*, and any additional supporting information. Documentation of a completed checklist and CCB presentation should be saved to the scheduled PfM leadership meeting folder two (2) or more business days prior to the scheduled meeting.

Refer to section 7.1 for CCB presentation preparation information.

4.11.6 CCB Review Meeting

The CBS code owner or a delegate will present the CM form and associated documentation to substantiate the change and the proposed funding mechanisms to the CCB.

Based upon the presented information, the CCB can request additional information or clarification to satisfy outstanding questions for the presented CM form.

If more information becomes available regarding a CM form that has not yet been routed for CCB approval, teams should continue to update the original CM form information, otherwise, it will be presented during the CCB review meeting. If the latest information impacts the CM form value in more than

+/-10 percent, the CM form shall be withdrawn from the CCB review and moved to the next available CCB review meeting.

CCB may approve a CM form even if it is not final, and PMTs will update non-material impacts without needing a secondary review/approval.

If the CCB requests additional information, it is the responsibility of the CBS code owner to ensure that the requested information is provided by the next scheduled CCB meeting when possible, or as directed by the CCB. When in receipt of the requested additional information, the CCB may elect to hold a follow-up meeting or render its decision through an alternative manner, such as an email.

4.11.7 CCB Record of Decision

Each CCB presentation must have a standard record of decision slide at the end, which will document which CCB members were present at the meeting, and the decisions made for each of the agenda items. The final approval decision will also be captured in the agenda for document retention purposes, with the more detailed notes residing in the "Record of Decision" slide. The *Change Management Form* shall be updated to reflect the CCB decision. The CBS code owner or delegate will update the "Decision" slide in the CCB presentation during or after the CCB meeting within two (2) business days of decision.

4.11.8 Post-Change Approval

The CBS code owner is accountable for the completion of all actions related to forecast and CAP, where applicable, in accordance with this guideline. Those actions include:

- Notifying the cost analyst(s) of the approved change so it can be implemented in the project CAP.
- Submission and updates to the *Change Management Form* as appropriate (per requirements in Section 4.5).
- Confirmation of CM form approval.
- Prior to an external filing, the program calendar will indicate a deadline for entering all change documentation. Any changes not entered by that point should be held until the following cost cycle and not implemented in the project CAP. However, it should be noted that MR related CM forms shall be approved and documented prior to making any associated forecast changes.

If the final amount changes by more than 10 percent from the amount approved prior to its incorporation into CAP at a project level, a re-approval of the total CM form amount is required. If the final amount changes by more than 10 percent from the amount approved after the original has

already been incorporated into the forecast, then a new CM form is required for the difference.

The PMT PM is responsible for ensuring that the above activities are completed in a timely manner.

5.0 Key Contact

For questions about the content or implementation of this procedure, contact [redacted]

6.0 Quality Records

6.1 Summary of Changes Table

Revision	Revised Section(s)	Revision Description
1	4.4, 4.5, 6.4	Replaced PowerPlan with Oracle Projects and updated CBS terminology accordingly
1	3, 4	• Refined roles and responsibilities for PMO, PfM, PMT, and CBS Code Owners • Replaced initiation criteria and documentation requirements with Change Form initiation criteria and documentation requirements. • Removed references to PIN List and Change Log and related Job Aids
2	4.1.2.1, 4.3.2	• Added 4.1.2.1 Documenting Schedule Changes for documenting schedule changes in change management. • Added review of CCB documents by the CCB Administrator prior to CCB Meeting to Section 4.3.2 • Spelling/format corrections added on 9/2/2022

Revision	Revised Section(s)	Revision Description
3	As noted	• Overall revision: Re-numbering of paragraphs. • Section 1.2 Added wording to supersede TSS Guideline TPC-PC-01 • Section 2.1 Acronyms: Replaced “Change Form” with “CM Form” to reflect form and workflow used in Unifier to document and process changes. • Section 2.2 References: Added Document Codes to References and fixed Hyperlinks and Cross References. • Section 2.2 Added Change Management Flow Process • Section 3.0 Responsibilities: Updated PfM and PMT roles and responsibility per revised program approval matrix • Section 4.0 Execution: Added definition of Project as ea. Ash Pond/Landfill. • Section 4.1 Change Identification: Redefined wording to define change and criteria. Removed reference to before/after 2 months from change identification. Added reference to Program Approval Matrix governing discrepancies if any. • New Section 4.2: Current Approved Plan • Section 4.4 (former 4.1.2): All documentation referred to Unifier. Removed thresholds (now under Program Approval Matrix) • New Section 4.5: Monthly Project and Program Change Summary • Section 4.6 (former 4.1.3): Edits for clarity on COR process and to avoid conflicts with SSJ process (not governed by this guideline) • Section 4.7: Removed the list of required Unifier Fields • Section 4.8 (Former 4.1.6) Revised wording and referred to Program Approval Matrix. Replaced 3-month criteria with 90 days, to match Program Approval Matrix. • New Title Section 5: Change Management Review and Approval to better segregate the approval process from the documentation process. Added PfM Leadership as an

Revision	Revised Section(s)	Revision Description
		approving role. • Section 5.1 (former 4.2): modified to match Program Approval Matrix, including addition of PfM Leadership. • Deleted former Section 4.5 Monthly EAC/Contingency/MR Reconciliation as it is covered under a separate guideline. • Deleted former Section 5.0 Control & Oversight Section (covered under the Cost Guideline) • New Section 5.1.1 for PfM Leadership Review • New Section 6.2 for general instructions on filling the CM Forms in Unifier
4	General 4.8	• Changed T&PS to TSS. • Changed formatting for consistency. • Removed table.
5	General	• Annual review, formatting updates
5	4.2	• Removed reference to NOV

7.0 Appendix

7.1 CCB Presentation Preparation

Use the *CCB Checklist* to determine if the CM form and CCB presentation are ready for CCB review. The *CCB Presentation Template* must be used for all CCB presentations. The *CCB Checklist* and presentation are prepared by the CBS code owner(s) for the CM form(s) being presented. The CBS code owner must ensure there is sufficient time for reviews of the checklist and presentation with reviewers as described in the *Change Management Guideline* prior to the CCB review. Presentation should be saved to the scheduled CCB meeting folder a week prior to the scheduled CCB meeting for PfM review, and the final agenda and presentations need to be sent out for CCB pre-read two (2) business days prior to the CCB meeting.

The CCB presentation must include the following information:

- Unifier CM form number and title.
- Date of CCB review.
- Estimated cost impact (show as “$0” if schedule only).
- Estimate schedule impact (show as “0” if cost only).

- Risk register ID number (show as “N/A” if not applicable).
- Description of the Unifier CM form with clearly defined request.
- Funding mechanism proposed (contingency, MR, EAC increase or decrease, budget transfer, or N/A). Be prepared to provide the basis for proposed funding.
- Summary of cost impact and annual cash flow. (If schedule only/no cost impact, do not delete slide, but show $0 on slide). Additional backup information with more detailed cash flows at the DOW (tier 2 task) and CPT (tier 3 task) levels may be required.
- Summary of schedule impacts. (If cost only/no schedule impact, do not delete slide, but include N/A or 0 months.)
    - Backup Slides: Additional information may be included. Add backup slides as needed.

Following CCB review, the CBS code owner must complete additional slides to complete the presentation and record.

- CCB decision documentation: Document the decision, list approvers, amount of funding approved, type of funding approved, schedule change approved, action items and additional information required, and if follow up review is required.
- Link to *CCB Template* and *CCB Checklist.*

7.2 General Instructions on Unifier CM Form

The CM form and presentation fields need to match to include the *Title, Description, Funding Source, Schedule Impact*, and *Cost Impact*. The below guidance should be followed when filling out a CM form in Unifier.

- The “Cost Estimate” field should be updated with the funding requested and should not be zero (including cash flow shifts and budget transfers).
- For contingency draw down or additions, the “Funding Source” field should be contingency.
- When contingency is used as a “Funding Source,” the “Contingency Driver” field needs to reference the reason for drawing contingency, otherwise this field should be populated as “Not Applicable.”
- The “Related Risk” field should be updated with the risk item number, if applicable.
- Detailed cost codes (level 3 or level 4, as the system allows) should be set up in the “Line Item” details tab.
- For cash flow shifts, all line items in the “Line Item” detail tab should remain zero, and the *Change Supporting Detail Template* should be attached for time phasing purposes.

- Final numbers reflected in the attachment should match the funds requested and be summarized and highlighted in yellow.

- When there are multiple schedule shifts within the same CM form, users should populate the “Schedule Impact” with overall (not cumulative) shift to the critical path, unless there is no impact to the critical path, in which case the largest impact should be used.