

December 31, 2025

BY EMAIL

Ms. Kelli-Ann Schrage, Manager
Wastewater Regulatory Program
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Dr.
Atlanta, GA 30334

**RE: Plant Scherer – NPDES Permit No. GA0035564
Transfer Notice of Planned Participation Scherer Unit 3**

Dear Ms. Schrage:

Pursuant to 40 C.F.R. § 423.19(l), Georgia Power Company (the “Company”) submits the following Transfer Notice of Planned Participation (“NOPP”) for Plant Scherer Unit 3.

The Company hereby notifies the Georgia Environmental Protection Division (“EPD”) that Plant Scherer Unit 3 will participate in the Voluntary Incentives Program and will comply with the alternative limits at 40 C.F.R. § 423.13(g)(3)(i). Plant Scherer utilizes an FGDW system that is common to all units and as such the VIP limits should apply at Outfall 03J.

The Company submits the following information pursuant to 40 C.F.R. § 423.19(l)(2):

The specific provision under which this transfer will occur:

Plant Scherer Unit 3 will transfer from the Permanent Cessation of Coal Combustion subcategory (40 C.F.R. § 423.19(g)(1)) to the Voluntary Incentives Program subcategory (40 C.F.R. § 423.19(j)(1)).

The reason such a transfer is warranted:

In October 2021, the Company submitted a NOPP for Unit 3 with the intent to permanently cease coal combustion by no later than December 31, 2028. In the 2022 Integrated Resource Plan (IRP) Final Order, the Georgia Public Service Commission (PSC) approved the retirement and decertification of Plant Scherer Unit 3 by December 31, 2028. In Georgia Power’s subsequent 2023 IRP Update, the Company noted new information regarding continued increases to the projected load forecast and capacity needs after 2028. In Georgia Power’s 2025 IRP, the Company requested to extend the operation of Unit 3 beyond December 31, 2028, and subsequently on July 15, 2025, the PSC approved the 2025 IRP request to extend operation of Unit 3. The Final Order from the PSC is provided as Attachment 1.

A narrative discussion demonstrating that each electric generating unit will be able to maintain compliance with the relevant provisions:

The Company continues its pursuit of a leading-edge and full-scale membrane-based FGDW treatment system, afforded by the unique FGDW conditions present at Plant Scherer. A separate crystallizer system will manage the concentrate from the membrane system for landfill disposal. The FGDW system is a common environmental control for all four generating units.

Consistent with Plant Scherer's annual ELG progress report filed in October 2025, the Company is providing the attached schedule outlining the pathway to achieving compliance with the VIP limits at 40 C.F.R. § 423.13(g)(3)(i) by December 31, 2028. The schedule is provided as Attachment 2 to this correspondence and illustrates a target construction completion date of mid-2027, with start-up and commissioning of the system commencing in late 2027.

The Company understands this transfer NOPP above to fully satisfy the requirements of 40 C.F.R. § 423.19(l), and the Company reserves its ability to submit a later determination of a new compliance pathway if the regulation is revised, circumstances change, or the Georgia PSC requires changes to the Company's compliance strategy for Plant Scherer Unit 3.

If you need additional information or have questions regarding this matter, please contact Stephanie Whitacre at 470-367-0303.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Jennifer McNelly, Vice President
Environmental Affairs

Attachments (2)

Cc: Ms. Sarita Banjade, EPD

STATE OF GEORGIA
BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:

**Georgia Power Company's)
2025 Integrated Resource Plan)
)** **Docket No. 56002**

In the Matter of:

**Georgia Power Company's 2025)
Application for the Certification,)
Decertification, and Amended)
Demand Side Plan)** **Docket No. 56003**

Stipulation

The Georgia Public Service Commission (“Commission”) Public Interest Advocacy Staff (“PIA Staff” or “Staff”), Georgia Power Company (“Georgia Power” or “Company”) and the undersigned Intervenors (collectively, “Stipulating Parties” or “Parties”) hereby agree to the following Stipulation as a resolution of the above-styled proceedings to consider the Company’s 2025 Integrated Resource Plan (“2025 IRP”) and Application for the Certification, Decertification, and Amended Demand Side Management Plan (“2025 DSM Plan”). This Stipulation is intended to resolve all issues in these Dockets. The Stipulating Parties agree as follows:

Supply Side Plan

1. The 2025 IRP shall be approved as filed unless amended by this Stipulation.
2. The Company’s Load Forecast, as updated through the February 2025 Load and Energy Forecast in Figure 2 and Exhibit 1 of the Rebuttal Testimony of the panel of Grubb, Hubbert, Looney, Robinson, and Valle, is based on substantially accurate data and an adequate method of forecasting. However, the Parties are aware that the Load Forecast is largely driven by the anticipated growth from only one customer class for which there is a lack of historic information to inform many of the assumptions used in the forecast. Therefore, the Company and Staff shall work collaboratively to modify or refine the Load Forecast, including methodologies, as additional experience and information is received. For those reasons, and independent of any conclusions stipulated in this paragraph, for the purposes of the 2029-2031 All-Source Certification Proceeding, the Company and Staff shall

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update the methodologies as they each determine to be appropriate, and Staff may propose that the Commission modify the methodology to include the materialization of executed Contracts for Electric Service in determining the Load Forecast. Further, the Parties agree to the following:

- a. The Company will continue its quarterly filings of Large Load Economic Development Reports and will include in each quarterly report as additional information the date that any new project enters the large load pipeline, the announced load of any new project entering the large load pipeline, and new large load projects that have entered into a Contract for Electric Service.
- b. Georgia Power shall update the capacity need in the 2029-2031 All-Source Certification Proceeding in October 2025 with the B2026 Load Forecast, shall file additional Load Forecast updates in February 2027 with the B2027 Load Forecast, and as part of the 2028 IRP.
- c. The Company shall be authorized to seek certification of up to 8,500 MW of capacity from the 2029-2031 All Source Capacity RFP. The Company agrees to provide generation procurement options to meet generation needs of at least 6,000 MW and up to 8,500 MW necessary to meet Georgia Power system demand. Upon consideration of the Company's updated October 2025 Load Forecast, as well as consideration of any Staff-proposed Load Forecast, the Commission can then appropriately determine necessary generation resources to certify as part of the 2029-2031 All-Source Capacity RFP certification proceeding.

3. The Company's recommended System long-term winter Target Reserve Margin value of 26%, long-term summer Target Reserve Margin value of 20%, and the short-term Target Reserve Margins associated with each season shall be approved for the purposes of current capacity procurement needs. The designation of a 26% winter Target Reserve Margin does not preclude the Parties from using a different reserve margin in subsequent proceedings. As additional large load customers are added to the system, the Company will collect data regarding their load patterns and behaviors. Prior to June 30, 2027, the Company and PIA Staff will meet to discuss and collaborate on the appropriate method to model data center loads in the Reserve Margin Study.
4. The Company will meet semi-annually with PIA Staff to provide updates on the Strategic Transmission Projects identified in Table 11.3 of the 2025 IRP to improve power transfer from South Georgia to North Georgia, prepare the transmission system for generation fleet transitions, and maintain System reliability. The

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Company will continue to identify alternative solutions considered for each project and the associated costs and benefits of the alternatives. The Company will continue to investigate and consider the use of emerging grid technologies as described in Technical Appendix Volume 3 of the 2025 IRP.

5. Staff's transmission recommendations will be adopted as follows:
 - a. Georgia Power shall adopt a formal process to evaluate Grid Enhancing Technologies ("GETs") as potential solutions for all major Georgia Power transmission projects and will include in the 2028 IRP a report on the planning assumptions, criteria, and outcomes associated with its GETs evaluations.
 - b. Georgia Power will continue to incorporate Non-Wires Alternatives screening into its standard project development process. If future BESS applications, configurations, and operations demonstrate that BESS can be deployed reliably and economically as transmission solutions, Georgia Power will continue to consider this technology as a solution.
 - c. Georgia Power will continue to work through the existing Southeastern Regional Transmission Planning ("SERTP") process and through the modifications forthcoming in the Company's June 2026 FERC Order 1920 compliance filing to coordinate regional transmission needs and subsequent projects with neighboring utilities. The Company will report on these efforts through the SERTP scheduled quarterly meetings. As part of its 2028 IRP Transmission Plan, Georgia Power will identify the regional transmission expansion projects evaluated through calendar year 2027 by Georgia Power, and through the SERTP process, and will identify the economic costs and benefits of each.
6. The extended operation of Plant Scherer Unit 3 and Plant Gaston Units 1-4 and A beyond December 31, 2028 shall be approved.
7. The request to certify wholesale capacity from Plant Scherer Unit 3 to be placed in retail rate base shall be approved with the market differential adjustments as filed.
8. The incremental capacity upgrades and certificate amendment for Plant McIntosh Units 10-11 and 1A-8A shall be approved.
9. The incremental capacity uprates at Plant Vogtle Units 1-2 shall be approved as filed. The incremental capacity uprates at Plant Hatch Units 1-2 shall not be approved at this time. The Company may proceed with preliminary planning, licensing and engineering for the capacity uprate at Plant Hatch Units 1-2. The Company agrees to provide a semi-annual report on the status of engineering and

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finalizing of contracts for the incremental capacity uprates at Plant Hatch Units 1-2 and Plant Vogtle Units 1-2.

10. The capital and operations and maintenance (“O&M”) costs (but not yet the recovery of such costs) for the modernization of Plants Tallulah, Yonah, Bartletts Ferry Units 5-6, and North Highlands hydro facilities shall be approved.
11. The request to develop, own, and operate incremental capacity at Plant Goat Rock Units 3-6 shall not be approved at this time. Georgia Power shall be allowed to spend up to \$25 million to undertake engineering studies to determine the most effective way to address water flow imbalance at Plant Goat Rock and to replace the horizontal units at Plant Morgan Falls. The Company shall provide the results of the engineering studies to PIA Staff. The Company’s plans and comprehensive and complete cost estimates for modernization at Plants Goat Rock, Lloyd Shoals, Flint River, and Wallace, as well as those to replace horizontal units at Plant Morgan Falls, will be filed in the 2028 IRP for Commission consideration.
12. The Environmental Compliance Strategy (“ECS”) shall be approved as updated in the 2025 IRP. This approval includes the Company’s plans to address coal combustion residual (“CCR”) at the Company’s ash ponds and landfills and associated measures taken to comply with environmental mandates. The existing government-imposed environmental mandates necessary for the Company to implement its ECS as presented in Technical Appendix Volume 1 and Environmental Compliance Cost Recovery (“ECCR”) and CCR ARO tables in the Selected Supporting Information section of Technical Appendix Volume 2 of the 2025 IRP have been reviewed in this proceeding and acknowledged. The Company will continue to provide CCR ARO semi-annual reports to the Commission. In addition, the Company will continue to file the ECS annually with the Commission no later than March 31 of each year.
13. The Company shall have the authority to pursue the natural gas co-firing compliance pathway as the 111 GHG Rule strategy for Plant Bowen and Plant Scherer. The Company will provide semi-annual reports on the status of 111 GHG Rule compliance starting with the semi-annual period ending December 31, 2025, with the report to be submitted by March 31 and September 30 of each year. These reports will identify the Company’s assessment of the current legal status of 111 GHG Rule and impact on the continued operation of Plants Bowen and Scherer, the Company’s actions and efforts to comply with 111 GHG Rule and any deferred cost incurred by the Company, and summary of technical solutions and the technical solutions capital and O&M cost estimates to comply with 111 GHG Rule for Plants Bowen and Scherer. The Company will include in the semi-annual

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reports any significant capital investment or capital investment commitments expected over the next reporting period at Plants Bowen and Scherer for 111 GHG Rule compliance. Should the 111 GHG Rule repeal be finalized by EPA and the Company's compliance preparations conclude, the semi-annual reports shall no longer be required.

14. The Company shall issue an All-Source RFP for capacity needs in 2032-2033 in the first quarter of 2026. At least twelve months in advance of issuing any subsequent All-Source RFP, the Company will coordinate with Staff on the selection of an Independent Evaluator.
15. The Company's enhanced Utility Scale Renewable Resource Request for Proposals ("US RFP") process shall be approved. The Company shall be authorized to procure energy from up to 1,000 MW of new Utility Scale renewable energy resources. In addition, the Company shall be allowed to procure up to 3,000 MW of new Utility Scale renewable energy resources through US RFPs to meet the needs of subscribing customers. The Stipulating Parties agree that any unfulfilled MW in the RFPs will be carried over to future US RFPs.
16. The Company's revised Distributed Generation ("DG") RFP process to procure energy from up to 100 MW of new DG solar and solar plus storage resources through two separate RFPs (50 MW each), shall be approved, along with the ability to procure additional resources above the initial MW targets to meet the needs of subscribing customers. The DG RFPs should target DG solar and solar plus storage resources and will be available for energy subscription. The Stipulating Parties agree that any unfulfilled MW in the DG RFPs will be carried over to future DG RFPs. The DG Working Group shall reconvene with the goal to provide feedback to the Company and Staff on DG RFPs and PPA terms.
17. The Company shall be allowed to use the updated Renewable Integration Study ("RIS") for planning purposes. The Company and Staff shall meet prior to the next RFP to determine how the specific Integration Costs and Flex Credits will be determined using the results of the 2024 RIS. Prior to December 31, 2025, Georgia Power and PIA Staff shall meet to review and discuss PIA Staff's suggested changes to the RIS. After this meeting, the parties shall file a compliance filing to provide the timeline for completion of the RIS prior to the next IRP and the process to be used by Georgia Power to determine the integration costs and the Flex Credit for each procurement. This filing will also address the methodology for calculating the RIS and any areas of disagreement between the Staff and the Company.

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18. The updated Renewable Cost Benefit (“RCB”) Framework, including incorporation of locational value in DG procurement evaluations shall be approved.
19. The enhanced Clean and Renewable Energy Subscription (“CARES”) program shall be approved, including the ability for participating customers up to 3 MW to subscribe to DG resources smaller than 6 MW and the opportunity for residential customers to subscribe through the DG Community Solar Program. The Company will make quarterly filings which will provide the current level of DG Community Solar Program subscriptions, by month.
20. The Company’s proposed enhancements to the CARES Utility Scale Program, including the option to procure from customer-identified renewable resources, shall be approved. The customer-identified renewable resource option shall begin in Phase 2 of the CARES 2025 RFP and multiple customers will be allowed to bring forward a single customer-identified resource for procurement.
21. The Company’s Customer-Sited Solar Plus Storage Pilot Program shall be modified such that participants will not be restricted from receiving service on the R and GS rate schedules. MUSH customers and churches will be allowed to participate with projects up to 1 MW. The Company shall hold up to two collaborative meetings, after an implementation partner has been selected, with PIA Staff and other Stipulating Parties prior to filing the program documents. Issues to be addressed prior to filing the program documents include determining how potential participants will be made aware of the remaining capacity for each pilot program option and formalizing the process for increasing the target capacity. Within six months from the date of the Final Order, the Company shall work with PIA Staff and other Stipulating Parties to determine whether and how multifamily premises can participate.
22. The modifications to the existing Customer Connected Solar Program, including increasing the facility size criteria to 250 kW minimum and 6 MW maximum and expanding resource types to include battery storage co-located with solar shall be approved.
23. The continuation and proposed modifications of the Company’s Distributed Energy Resources (“DER”) Customer Program portfolio shall be approved.
24. The Large Customer Owned Resiliency Program shall be approved.
25. The Company is approved to further develop and deploy a Distributed Energy Resource Management System (“DERMS”) to enhance the control and operational

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capabilities of DERs to ensure reliability and enable and optimize grid support functions. The Company shall file annual reports on implementation status and budget versus actual costs.

26. The Electric Transportation Vehicle-to-Everything (“V2X”) Pilot shall be approved. The Company shall include annual reports on implementation status and budget versus actual costs within the Company’s annual Electric Transportation Summary Report.
27. The Company is approved to collect a levelized additional sum of \$3.00 / kilowatt (“kW”) alternating current (“AC”) of the total capacity amount from new demand response and new DER programs, including the Large Customer Owned Resiliency Program, Customer-Sited Solar Plus Storage Pilot Program, and modified Customer Connected Solar Program.
28. The Company is approved to collect a levelized additional sum of \$3.50 / kW-yr AC of the total capacity amount from which renewable energy is procured from the Utility Scale and DG RFPs proposed in this IRP, annually for the term of each PPA.
29. In conjunction with the ongoing level of review and analysis required by this agreement, Georgia Power will agree to pay for any reasonably necessary specialized assistance to PIA Staff in an amount not to exceed \$500,000 annually. This amount paid by Georgia Power under this Paragraph shall be deemed as a necessary cost of providing service and the Company shall be entitled to recover the full amount of any costs charged to the utility.

Demand Side Plan

1. The Company’s 2025 DSM Plan is approved as filed with the following adjustments proposed by the Staff and agreed to by the Company.
2. The Company will include an additional sensitivity in its 2028 IRP development and resource optimization process. In this additional sensitivity case, DSM resources, including demand response and energy efficiency, will be allowed to compete head-to-head with supply-side options in the Company’s IRP model as a selectable resource. This new sensitivity will replace the Aggressive Case scenario in the DSM Program Planning Process. The Commission will authorize the Company to recover the additional costs required to complete this new sensitivity through the DSM rider after review and approval by Commission Staff. To implement this change:

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- a. Step 8 in the DSM Program Planning Process will be revised to state: “The Company will also produce an additional sensitivity in its 2028 IRP development and resource optimization process, where DSM is allowed to compete head-to-head with supply-side options in the Company’s IRP model as a selectable resource. This sensitivity will be called the Integrated DSM Change Case.”
 - b. Step 9 in the DSM Program Planning Process will be revised to state: “The Company will use the difference in costs between the base case and the Proposed DSM change case configuration to determine the avoided generation cost impact of the DSM measures in the Proposed DSM change case. As the final step, the cost effectiveness tests mentioned in item 6 (above) will be calculated based on the inputs and adjustments from the system tools. Revenue impacts will be based on current rates and escalations based on the Company’s financial projections adjusted for the DSM cost impacts. The avoided generation costs from the system tools and the avoided Transmission and Distribution (“T&D”) revenue requirements as estimated by PRICEM will be used to calculate the benefits of the RIM, TRC and Program Administrator test for the Proposed DSM change case. The projected deadline for including new programs in the system planning process is October 1, 2027.”
3. The Demand Side Management Working Group (“DSMWG”) will continue in its current form and be involved in the development of future DSM programs in the same manner it has operated in past IRP cycles.
4. The Commission shall approve the Company’s request for decertification of the Refrigerator Recycling Plus, Residential Specialty Lighting, and Commercial Behavioral programs.
5. The Company’s proposed Residential Products Program will not be certified. The Company’s waiver request for Commission Rule 515-3-4-.04(4)(a)(3) for the Residential Home Energy Improvement, Residential Energy Assistance for Savings and Efficiency, and Residential HopeWorks Programs shall be approved.
6. The amended Certificates for the Residential Behavioral, Residential Demand Response, Residential Home Energy Improvement, Residential Energy Assistance for Savings and Efficiency, Residential HopeWorks, Commercial Custom, Commercial Prescriptive, and Small Commercial Direct Install Programs shall be approved.

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7. The Automated Benchmarking Tool (“ABT”) will continue for the 2026-2028 program cycle as approved in the 2019 and 2022 IRPs at a preapproved cost of no more than \$600,000.
8. Georgia Power will implement Staff’s Recommended Case for the 2026 through 2028 IRP cycle. Staff’s Recommended Case energy savings targets in Exhibit BCS-9 of the Direct Testimony of Jamie Barber, Nick Cooper, and Richard F. Spellman shall be approved.
9. The approved program budget is as provided in Attachment A to this Stipulation.
10. Georgia Power will implement an online residential energy audit tool, small team of residential energy experts (auditors), and/or other similar emerging technologies to help customers understand their energy usage and address and alleviate affordability concerns. The budget for this tool will be \$2.2 million per year for the three-year cycle.
11. The Education Initiative-Learning Power budget will be \$4 million annually for 2026-2028.
12. The annual Residential and Commercial Energy Efficiency Consumer Awareness budgets will be \$4.5 million and \$1.1 million, respectively, during the 2026-2028 program cycle.
13. The DSM pilot budget will be \$3 million per year, to be split evenly between Residential and Commercial classes. The Company will seek Staff’s input regarding any proposed pilots before they are implemented and throughout the course of the pilot.
14. The current methodology approved for the DSM additional sum mechanism will continue at 9.5% of shared savings for all programs except for residential income-qualified programs, and the Company’s additional sum will continue to be based on net energy savings rather than gross energy savings. For residential income-qualified programs, the additional sum will be based on \$.02 per first-year kilowatt hour (“kWh”) saved, based on net savings.
15. Once the Company selects program implementers and program plans are developed, these plans will be provided to PIA Staff for review and input prior to implementation of the corresponding programs. The Company should provide PIA Staff with at least 15 days for review of the Final Program Plans.

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16. The current DSM true-up process will continue, including not allowing the rollover of unspent annual budget dollars or unrealized savings targets. Additional details of actual incentive and non-incentive costs compared with budgeted costs for each program will be provided in the true-up filing.
17. The three-year program Evaluation Measurement & Verification (“EM&V”) cycle will continue from 2026 to 2028.
18. As set forth in Staff’s testimony, the 2024 EM&V results will be used as recommended by the independent program evaluators.
19. The Company will evaluate income-qualified savings in a manner consistent with the remainder of the Residential sector to confirm whether the Net-to-Gross (NTG) assumption is appropriate.
20. The current policy to implement the EM&V results in the first year of the next IRP cycle will continue by using the 2024 EM&V results as the basis for DSM measure and program savings for the 2026-2028 cycle. The Company will implement new EM&V results of the first year of the next IRP cycle in 2029.
21. The current Commission policy that requires the Company to provide detailed evaluation plans for each of the approved DSM programs within 90 days of the selection of the Program Implementers for each of the certified programs will continue. However, Staff will work with the Company to extend the 90 days on an as-needed basis as it has in prior IRP cycles.
22. If EM&V findings or results show errors with reporting of program or measure kWh and kW savings or costs during the program cycle, such errors will be immediately corrected for the reporting of results in the next program cycle.
23. The Company will use the NTG ratios from the 2024 EM&V report for the 2026-2028 program cycle.
24. The Company will include an assessment of potential demand savings from demand response measures in the potential study that will be filed in January 2027. The cost of this additional assessment will be recovered through the DSM rider after review and approval by Commission Staff. The Company will work with Staff on input regarding the scope of this study prior to issuance of a request for proposals for both studies.

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Agreed to this 8th day of July, 2025.

Chris

Chris Collado

On Behalf of the Georgia Public Service Commission
Public Interest Advocacy Staff



Steven J. Hewitson
Brandon F. Marzo

On Behalf of Georgia Power Company

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Plant Scherer – FGDW VIP Schedule

