

October 13, 2021

BY EMAIL AND CERTIFIED MAIL

Ms. Audra Dickson, Manager
Wastewater Regulatory Program
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Dr.
Atlanta, GA 30334

**RE: Plant Wansley – NPDES Permit No. GA0026778
Notice of Planned Participation Wansley Units 1 and 2**

Dear Ms. Dickson:

Pursuant to 40 C.F.R. § 423.19(f), Georgia Power Company (the “Company”) submits this Notice of Planned Participation (“NOPP”) for Electric Generating Units 1 and 2 at Plant Wansley.

The Plant discharges under NPDES Permit No. GA0026778, which became effective on November 1, 2020. The Permit contains, at Part I.A.6, generally applicable effluent limitations for flue gas desulfurization wastewater (“FGDW”) based on 40 C.F.R. § 423.13(g)(1)(i).

The Company hereby notifies the Georgia Environmental Protection Division (“EPD”) that Units 1 and 2 intend to permanently cease coal combustion by no later than December 31, 2028 and are eligible for the alternative limits for FGDW at 40 C.F.R. § 423.13(g)(2)(i). The Company requests that the Permit be modified as stipulated in Part III.C.6¹. This modification should remove the generally applicable effluent limitations for FGDW and incorporate the alternative effluent limits for FGDW § 423.13(g)(2)(i) for these two units that will permanently cease coal combustion by December 31, 2028.

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

The electric generating units intended to achieve the permanent cessation of coal combustion:

Plant Wansley Unit 1.
Plant Wansley Unit 2.

The expected date that each electric generating unit is projected to achieve permanent cessation of coal combustion:

No later than December 31, 2028.

Whether the expected date represents a retirement or a fuel conversion:

Retirement.

¹ A request for modification of the Plant Wansley NPDES permit was previously submitted on January 11, 2021, but that request was absent the information being provided in the NOPP. As such, the NPDES permit modification only need include the updated generally applicable effluent limits, in addition to the alternative effluent limits for FGDW based on 40 C.F.R. § 423.13(g)(2)(i) for units that will permanently cease coal combustion by December 31, 2028.

The relevant regulatory body:

The Georgia Public Service Commission (“PSC”).

Whether each retirement or fuel conversion has been approved by a regulatory body:

No decertification request or retirement has been approved by the PSC, but the Company anticipates the 2022 Integrated Resource Planning (“IRP”) proceedings to address decertification of Wansley Units 1 and 2.

Documentation supporting that the electric generating unit will permanently cease the combustion of coal by December 31, 2028:

The Company will provide EPD with the relevant documents from the January 2022 IRP filing with the PSC that further supports the likely proposed request for decertification and retirement of Wansley Units 1 and 2.

The Company has previously disclosed the likely accelerated retirement of Plant Wansley Units 1 and 2 in the February 17, 2021 annual 10-K filing with the U.S. Securities and Exchange Commission.²

A timeline to achieve the permanent cessation of coal combustion with interim milestones and the projected dates of completion:

The Company has composed the timeline below with interim milestones. These milestones are necessarily tentative given the amount of time prior to cessation of coal combustion and need for PSC approval, and not all milestones might be necessary to achieve permanent cessation of coal combustion on or before December 31, 2028.

<u>Milestone</u>	<u>Projected Date</u>
Submission of the 2022 IRP to the PSC	January 31, 2022
Final Order on the 2022 IRP from the PSC	August 31, 2022
Submission of the 2025 IRP to the PSC (if necessary)	January 31, 2025
Final Order on the 2025 IRP from the PSC (if necessary)	August 31, 2025
Submission of the 2028 IRP to the PSC (if necessary)	January 31, 2028
Final Order on the 2028 IRP from the PSC (if necessary)	August 31, 2028

² The Southern Company (February 17, 2021). Annual report to shareholders at II-43.
<https://www.sec.gov/ix?doc=/Archives/edgar/data/3153/000009212221000006/so-20201231.htm>

The Company understands this NOPP to fully satisfy the requirements of 40 C.F.R. § 423.19(f), and the Company reserves its ability to submit a later determination of a new compliance pathway if circumstances change or the Georgia PSC requires changes to the Company's compliance strategy for Plant Wansley Units 1 and 2.

If you need additional information or have questions regarding this matter, please contact Dominic Weatherill at 404-506-3348.

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,

Aaron D. Mitchell
Environmental Affairs Director

A handwritten signature in blue ink that reads "Aaron D. Mitchell". The signature is written in a cursive style with a large initial "A" and "M".

CC: Ms. Sarita Banjade, EPD