

July 26, 2022

Ms. Karen Hays  
Stationary Source Permitting Program  
Georgia EPD - Air Protection Branch  
4244 International Parkway, Suite 120  
Atlanta, Georgia 30354

**Re: Georgia Power Comments on Georgia Regional Haze SIP Draft during Public Comment Period**

Dear Ms. Hays,

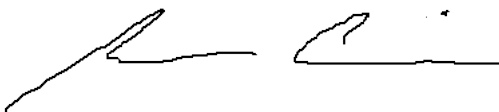
Georgia Power Company submits the following comments during the public comment period on the Georgia Regional Haze state implementation plan (SIP) draft published on June 24, 2022.

As indicated in Georgia EPD's proposed Regional Haze SIP, Georgia Power is in the middle of the triennial integrated resource planning (IRP) process required by the Georgia Public Service Commission. As part of this process, the Commission was considering the remaining useful life of the coal-fired power plants currently in operation. In its IRP, Georgia Power requested approval of the planned retirement of Plant Bowen Units 1 and 2, Plant Scherer Unit 3, and Plant Wansley Units 1 and 2. The Georgia Public Service Commission voted on the 2022 Integrated Resource Plan on July 21, 2022, approving the retirement of Plant Wansley Units 1 and 2 by August 31, 2022, and Plant Scherer Unit 3 by December 31, 2028, and deferring the approval of the proposed 2027 retirement of Plant Bowen Units 1 and 2 to be re-assessed in the 2025 IRP process. The Commission order will be issued in the coming weeks. Since the Plant Bowen Four-Factor Analysis (FFA) did not account for a specific retirement date and conservatively evaluated a 30-year remaining useful life, the Commission's deferral does not impact the outcome of the Regional Haze analysis completed by Georgia Power for Plant Bowen Units 1-4.

Georgia Power has also identified a typographical error in the Plant Bowen FFA updated in October 2021 in response to comments to Georgia EPD. While the analysis and the calculated cost effectiveness of \$6,424 was updated throughout the FFA, the assumed annual cost for switching to PRB coal of \$48,059,482 was updated in the supporting calculations table in Technical Appendix Table A1.1 but not in Table 5. No calculations were affected by this typographical error, and Georgia EPD correctly included the total annual costs of \$48,059,482 in the Georgia Regional Haze SIP draft Section 7.8.2, Table 7-36. Thus, this correction only impacts the "Georgia Power - Plant Bowen Four Factor Analysis" attachment in Appendix G-1b. Georgia Power will submit updated public and trade secret versions of the Plant Bowen FFA this week.

Thank you for the opportunity for Georgia Power to provide comments on the draft Regional Haze SIP. Please contact Rachel Greiner at (404) 851-4916 with any questions.

Sincerely,



Rosa Chi  
Air Manager