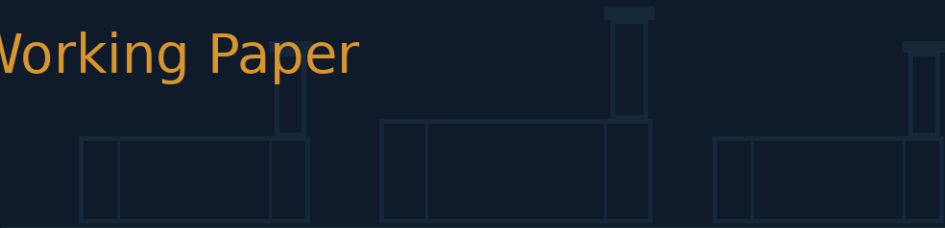


What the Certificate Points At

Fuel Disclosure, Sealed Cost, and One Georgia Certification of 9,885 Megawatts

An Independent Working Paper



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Version note. First edition. This is the Georgia counterpart to *What the Record Does Not Say*, the Virginia paper on the same question, deposited at 10.5281/zenodo.22754151, all versions 10.5281/zenodo.22754150. The two are companions and neither depends on the other. The corpus behind this paper is set out in the About the Author section.

Evidence snapshot. The Georgia record is read as the public dockets in Georgia Public Service Commission Docket Nos. 56298 and 56310 stood on 16 September 2026. Both docket listings were enumerated in full on that date, at 109 and 106 documents, and the 215-row enumeration is deposited with the archive.

Three documents from outside those two dockets are read and cited, because the Stipulation reaches them by reference. The Commission's order certifying Plant Yates Units 8-10 and the Staff testimony that order implements are in **Docket No. 55378**; the two Yates construction monitoring reports are in **Docket No. 55931**. Stipulation paragraph 5 adopts the Yates monitoring process and procedures for the resources certified here, so what those documents contain is part of what this certification requires. They are cited by document number and deposited on the same terms as everything else. Commission orders are quoted from the Word issuance files rather than from the scanned PDFs, which in these dockets carry no text layer. Citations to the Application are to its printed page numbers, which run eleven behind the PDF page through the body and stop at printed page 60, after which the attachments are unnumbered and are cited by PDF page. Application tables are read from page images rendered at 200 dpi rather than from text extraction, because column alignment is what extraction gets wrong.

On the negatives. This paper turns on absences as much as on statements, so every negative is bounded to named documents and named search strings, and Appendix B publishes the strings behind each one with the date it was run. A negative bounded to a party's filings takes its bound from the docket listing rather than from what the retrieval happened to hold, a rule this research adopted after learning the difference the hard way.

On what is graded. Section 2 carries the paper's factual foundation and Appendix A grades every claim in it against the deposited archive. Appendix C indexes every step in sections 3 through 8 where the

paper goes beyond what a retrieved document says, and states for each what would defeat it. Appendix D is a census of the 299 redactions in the five gas purchase agreements, located by contract heading.

Matters pending at the snapshot date. The hearing transcripts in these dockets are listed and carry no attached files; each of the three document pages was fetched directly on 16 September 2026 and confirmed. No hearing record is read here. The written recommendation of Commissioner Advisory Staff that the order denying reconsideration adopts is not filed in either docket.

Disclosure. The author serves on the advisory board of a Sloan Foundation-funded study at Emory University. The study had no role in this article; the About the Author section states the role in full.

Abstract

On the same day in July 2025, Georgia Power filed two applications with the Georgia Public Service Commission seeking certification of capacity whose two stated components sum to 9,885 megawatts. Both were granted in full by Commission action on December 19, 2025, in an order issued December 30. Inside that single certification sit two classes of gas resource and two different disclosure outcomes, though not the ones a reader might expect. The certified cost is sealed for both: the order certifies the Company-owned resources at the amounts in Table 1.3.4 and the purchase agreements at the amounts in Table 4.4, and every cost cell in both tables is redacted. What differs is the fuel. Five power purchase agreements, all for plants already operating, are public at 114 to 155 pages with 42 to 78 redactions each, and every one names the interstate pipeline, names the transportation zones, in three of the five identifies a specific delivery point, and sets out how the firm transportation charge enters the daily fuel cost. The three Company-owned combined cycles at Plants Bowen, Wansley and McIntosh, none of them built, have their pipeline named in the application and nothing further. Searched in full on 15 September 2026, the public Application states no delivery point, no rate construction and no figure for any of the three. Neither class lets a reader compute a dollar, because in all five the heat rate content is redacted and the contracted energy amounts are named in the trade secret affidavits as withheld, and in the four All-Source contracts, searched in full, no firm transportation quantity appears at all. What the record does carry is two per-plant computations of the Company-owned firm transport and storage cost, one by an intervenor's witness and one by the Commission's own Public Interest Advocacy Staff, and in the public version of each the table survives as labels with every cost figure deleted. Staff's decomposition is the finer of the two, splitting the transportation charge into an intrastate component and a lateral component, and its column naming the pipeline is blank in a docket where the application names the pipeline in public text. Staff recommended that the construction monitoring reports for the three plants carry the status of their firm transportation. The Stipulation Staff signed twenty-eight days later adopts the monitoring framework and drops that reporting, the order adopts the Stipulation's text, and both instruments return zero on transport, pipeline and FERC. Georgia law makes the sealed figure load-bearing. O.C.G.A. § 46-3A-5(b) requires each certificate to describe its approved cost; this certificate describes it by pointing at redacted tables. Section 46-3A-7(a) then makes that approved cost the threshold deciding whether exclusion from rate base requires one of five findings against the utility or instead requires the utility to prove prudence, and subsection (c) makes verification foreclose exclusion altogether. No reported Georgia appellate decision construing those sections was locatable by public web search on September 15, 2026, a search that did not reach Westlaw, Lexis, or the Commission's own order archive. Section 46-3A-5(b) was litigated against this order on reconsideration, the two stipulating parties answered it in incompatible ways, and the order denying reconsideration runs 582 words and does not use the word forecast. This paper traces what each instrument wrote down, and states plainly the explanation it cannot rule out: that a contract for an operating plant and a certification filing for a plant not yet built are different instruments for reasons that have nothing to do with who owns them.

Keywords: certificate of public convenience and necessity; integrated resource planning; interstate pipeline capacity; firm transportation; trade secret designation; rate base; cost recovery; data centers; Georgia (United States)

1. Two filings, one day

The Tenaska Heard County power purchase agreement tells you what the gas costs to move. It is 155 pages in the public docket, redacted 55 times, and it names the point of delivery to the milepost: “Gas Delivery Point: Point of interconnect between Facility and Transco main line near milepost 1001.73.”¹

Part 11 of that contract is headed FUEL SUPPLY ALLOWANCES. Section 11.2.1 states the default allocation in one sentence: “Except as provided in this Part 11 (Fuel Supply Allowances), GPC will bear all costs incurred under the Gas Supply Plan.”² And the contract prices delivery by formula rather than by a negotiated number, so the formula can be read even though the number moves: “The Daily Fuel Cost (DFCGAS) for operation on Natural Gas will be determined as follows: $DFCGAS = (SGD + FTA + ITA)$ ”, where SGD is the Gas Day’s Platts Gas Daily midpoint for Transco Zone 4, FTA is “the Transco Zone 4 to Zone 4 maximum firm transportation variable charges including all fuel retention and surcharges as set forth in the then effective Transco tariff Zone 4 to Zone 4,” and ITA is the interruptible adder for volumes above the firm transportation quantity.³

What that formula does not give is a cost. The rate is public, but the quantity is not: the Guaranteed Heat Rate is redacted in every one of the five, whether as coefficients to a printed formula, as the whole right-hand side, or as the formula itself, the contracted energy amounts are named in the trade secret affidavit as withheld, and no firm transportation quantity appears anywhere in the four contracts. So the agreements put the arrangement on the record, down to a named pipeline and a named zone, and in three of the five to a specific delivery point (Sandersville’s Sonat Zone 3 South node #930300, Mid-Georgia’s named lateral, and Tenaska’s Transco milepost 1001.73), and stop short of anything a reader could price.

The four power purchase agreements attached to the other application filed that day work the same way, with one difference noted below. Each is an execution draft marked PUBLIC DISCLOSURE on every page, runs 114 to 122 pages, and carries 42 to 78 redactions. Each contains a FUEL SUPPLY part, a defined Gas Delivery Point, and the same formula in the same shape: $DFCGAS = (SGD + VTA + IT)$.⁴ For Sandersville and Mid-Georgia Cogeneration the transportation adder is “SNG’s Zone 0 to Zone 3 maximum firm transportation variable charges including all fuel retention and surcharges”; for Plant Harris it is SNG Zone 0 to Zone 2; for Plant Dahlberg it is “Transco Zone 4 to Zone 4,” and the contract’s

¹ Tenaska Heard County CT PPA, Georgia PSC Docket No. 56310, Application for the Certification of Supplemental Resources for 2028-2031 Capacity, document 223492, filed July 30, 2025, public version, 155 pp. Every primary document cited in this paper is deposited with the paper as an archive of 100 files, listed in GA_Gas_Deposit_Manifest.csv with its size, its SHA-256, its Georgia PSC document number where it has one, and the URL it was fetched from. Where a row carries a landing-page URL of the form psc.ga.gov/search/facts-document/?documentId=N, the file downloads from services.psc.ga.gov/api/v1/External/Public/Get/Document/DownloadFile/{documentId}/{fileId}, with the fileId read off the landing page.

² Ibid., Part 11, § 11.2.1 (Gas Supply Plan Costs).

³ Ibid., Part 11, § 11.2 (Natural Gas Transportation Capacity).

⁴ Georgia PSC Docket No. 56298, Application for the Certification of the All-Source Capacity Power Purchase Agreements and Company-Owned Proposals, document 223493, filed July 30, 2025, public version, Appendix A: four pro forma power purchase agreements, execution drafts, each marked PUBLIC DISCLOSURE: 303-01 (Sandersville, 114 pp), 311-01 (Mid-Georgia Cogeneration, 122 pp), 269-07 (Plant

exhibit carries the line “Gas Delivery Point Transco Zone 4.”⁵ The difference is that these four cite no tariff by name, where the Tenaska contract points to “the then effective Transco tariff.” Pipeline and zone are named in all five; the tariff reference is Tenaska’s alone.

One clause says something about the Company rather than the seller. The interruptible adder applies, in each of the four, to “any amount needed above the firm transportation capacity procured by GPC.”⁶ Georgia Power procures firm transportation for these facilities, and the procurement is named and zoned in a document anyone can download, with the transportation charge tied to a published index.

Now the other class of resource in the same certification.

Plants Bowen Units 7-8, Wansley Units 10-11 and McIntosh Unit 12 are three Company-owned combined cycle projects, comprising five combined cycle units, that Georgia Power will build and place in rate base.⁷ They were certified by the same Commission, in the same order, on the same day, in the same two dockets.

The application names their pipelines. Section 7.4, Fuel Use: “These projects will receive direct connection and firm transportation supply service on the Transco pipeline for the Bowen and Wansley units and on Southern Natural Gas for McIntosh. The dedicated fuel supply service, as well as ULSD back-up fuel, will provide reliability and resiliency benefits to customers. The lateral costs for each site have been incorporated into the project’s evaluation.”⁸

What the application does not give is the price. Table 7.5.1, COP Thermal Estimated Annual Costs, carries REDACTED across every column of every year, including Estimated Annual Depreciation, Debt and Equity Financing Costs, Income Taxes on Capital Investment, Fixed O&M, Insurance, Property Taxes and Capital Additions.⁹ Section 7.25, headed Cost Recovery, presents a summary table in which the nominal capacity column survives and all three cost columns, for every plant and for the total, read REDACTED.¹⁰

Dahlberg, 115 pp), 269-06 (Plant Harris, 114 pp). Redaction counts are of the literal token “REDACTED” in each document’s text layer, counted September 15, 2026.

⁵ Ibid., each of the four at its Monthly Fuel Adjustment provision; 269-07 additionally at its Gas Delivery Point exhibit line.

⁶ Ibid., each of the four at the definition of the interruptible transportation term. The Tenaska contract’s equivalent term omits the words “by GPC.”

⁷ Document 224953, recitals, describing “three thermal Company Owned Projects (‘COP’) for five combined cycles (‘CCs’).” This paper refers to three projects throughout; the five units are the turbine trains within them.

⁸ Document 223493, § 7.4 (Fuel Use) at p. 40.

⁹ Ibid., Table 7.5.1 (COP Thermal Estimated Annual Costs) at printed p. 41 (PDF p. 52).

¹⁰ Ibid., § 7.25 (Cost Recovery) and Table 7.25 (COP Thermal Total Certified Cost Summary) at p. 55, read from a page image rendered at 200 dpi. The Nominal Capacity column is not redacted and reads 1482, 1453, 757, total 3,692.

And the order granting the certificate names no pipeline company, states no capacity factor, and does not use the phrase firm transportation.¹¹ The search was bounded to that document and to the nineteen fuel and pipeline terms.

That is the subject of this paper. Five contracts that put the fuel delivery arrangement on the record, three filings that name the pipeline and stop, no public figure on either side, one certification, a certified cost that is sealed for both classes, and a statute that makes the sealed cost the number everything later turns on.

The difference between an operating plant under contract and a plant not yet built is stated here at the outset because it is the most obvious competing explanation for everything that follows, and this paper cannot rule it out. Section 8 returns to it.

2. What Georgia Power asked for, and what was granted

2.1 The two applications

On July 30, 2025, Georgia Power filed two applications one document number apart. Document 223493 in Docket 56298 sought certification of the winning resources from the 2029-2031 All-Source Request for Proposals. Document 223492 in Docket 56310 sought certification of Supplemental Resources for 2028-2031 capacity. The All-Source application explains why a second filing was needed: the Company “has also identified and filed an application for certification of an additional grouping of resource options that will allow it to fully meet future customer needs as the All-Source RFP was insufficient to meet all projected capacity needs.”¹²

The Commission’s order states both requests in its own words. For the first, the Company “seeks a Certificate of Public Convenience and Necessity from the Commission for 7,999 MW of resources, which includes four thermal PPAs (collectively the ‘All-Source PPAs’), three thermal Company Owned Projects (‘COP’) for five combined cycles (‘CCs’), nine standalone BESS COPs, and two BESS + Solar COPs.”¹³ For the second, the Company “also seeks a Certificate of Public Convenience and Necessity from the Commission for a 1,886 MW portfolio of supplemental resources.”¹⁴

The order’s nine ordering paragraphs grant every resource sought across both dockets, naming twenty-six of them from Bowen Units 7-8 through Wadley BESS. Nothing is denied and no quantity is reduced.¹⁵

That is not what the Commission’s own Public Interest Advocacy Staff had recommended. Staff’s resource panel, Tom Newsome, Philip Hayet and Leah Wellborn, filed direct testimony on November 12, 2025 ranking all twenty-six resources and sorting them into three dispositions.¹⁶ Staff’s Table 3, headed Recommendations for Certification, totals 3,125 MW nominal and contains seven resources: the four

¹¹ Georgia PSC Docket Nos. 56298 and 56310, Order Adopting Stipulation and Granting Certification of Capacity, document 224953, filed December 30, 2025, read from the Word issuance file.

¹² Document 223493, § 1.3.4 narrative at p. 4. The sentence appears in the All-Source application, describing why the companion filing exists.

¹³ Document 224953, recitals.

¹⁴ Ibid.

¹⁵ Ibid., ordering paragraphs 1 through 9.

All-Source thermal purchase agreements, the Tenaska agreement, and the Thomson and Wansley battery projects. None of the three Company-owned combined cycles is on it. Bowen Units 7-8 and Wansley Units 10-11 appear in Staff's Table 12 as Conditional, to be acquired only if further large load contracts were executed by March 16, 2026. McIntosh Unit 12 is ranked twenty-fifth of twenty-six, at an eleven percent take, and its disposition is Reject; Staff's Table 5, Recommendations to Reject, carries it at 757 MW among 2,463 MW nominal of rejections.

Staff put a number on the need it was sizing against: a capacity deficit of 2,786 MW on its Scenario 1 forecast, which its 3,125 MW recommendation "exceeds ... by 305 MW ... and provides a cushion for additional data center load growth." Its higher Scenario 2 alternative would have certified 5,091 MW. The Commission certified 9,885.

2.2 How much of this is new plant

Not all of it. The Supplemental application states that "Georgia Power currently has the Tenaska Heard County CT resource under a PPA through May 31, 2030, as Exelon Heard Units 1-6. The new Tenaska Heard County PPA would secure this existing market resource starting June 1, 2030, for a 20-year term. Similarly, the Company has an existing MPC PPA for 750 MW for 2024-2028 from the 2023 IRP Update. The PPA amendment in this Application would extend the Company's access to 50 MW for 2029."¹⁷ Those two are 980 of the 1,886 megawatts.

The 1,886 is mixed-basis too, and the application says so on its face. It itemises four components: 646 MW from five BESS purchase agreements with NEER entities, 260 MW from the Company-owned Wadley BESS, 930 MW from the Tenaska Heard County PPA, and 50 MW from the MPC amendment.¹⁸ Three of the four are stated as nominal. The fourth is not: the application's own footnote says the Tenaska PPA "includes 930 MW summer capacity on natural gas" and is "operationally capable of up to 1,080 MW winter capacity on fuel oil," and that "a 945 MW winter capacity rating is reflected in the evaluations of this resource" pending transmission availability.¹⁹

So the headline total takes Tenaska at summer while the evaluation behind it takes Tenaska at winter. On the winter figure the four components sum to 1,901, not 1,886. Fifteen megawatts is immaterial to anything in this paper. The point is that the same mixing that produces 7,999 against 8,248 in the All-Source filing is present in the companion filing, in a single resource, with both figures printed on the same page.

¹⁶ Direct Testimony and Exhibits of Tom Newsome, PE, CFA, Philip Hayet and Leah Wellborn on behalf of the Commission's Public Interest Advocacy Staff, Docket Nos. 56298 and 56310, document 224506, filed November 12, 2025, 87 pp., public disclosure version. Table 3 at p. 6, Table 5 at p. 8, Table 12 at p. 31.

¹⁷ Document 223492, resource discussion.

¹⁸ Georgia PSC Docket No. 56310, Application for the Certification of Supplemental Resources for 2028-2031 Capacity, document 223492, at the itemisation of the four components. 646 plus 260 plus 930 plus 50 is 1,886.

¹⁹ Ibid., footnote 2 to that itemisation, and the Tenaska resource discussion. With Tenaska at the 945 MW winter rating the four components sum to 1,901.

The four All-Source purchase agreement facilities are also existing plants, described in the present tense: “The Sandersville facility provides a winter equivalent capacity of 156 MW,” and the same construction for Mid-Georgia Cogen, Dahlberg and Harris.²⁰

So the certification mixes new construction with contracts securing plants already running, and every one of the five gas purchase agreements is in the second category. This bears on Section 5 and Section 8 and is stated here so that no later section rests on the reader missing it.

The distinction is the Commission Staff’s own, and Staff gave it as a reason. Recommending the four All-Source thermal agreements for certification, Staff wrote that “These resources are existing projects, which eliminates the risk of cost overruns and construction delays,” and recommended the Tenaska agreement in part because it “will not require new construction or transmission investment.”²¹ A reader weighing whether the pattern this paper describes reflects ownership, or merely reflects the difference between a running plant and an unbuilt one, should know that the Commission’s own advocacy staff treated the two classes differently and said why.

2.3 The total the order does not state

Searched in full, the order contains zero occurrences of “9,885” and zero of “9,985.” It states the two components and never a combined total.²² The search was bounded to that document and those two strings.

The sum of the two components is 9,885 megawatts, which is arithmetic on two figures the order states and not a figure the order itself prints.

The Commission’s own Data Center Fact Sheet of March 2026 states that the Commissioners approved an agreement “that certifies the construction of 9,985 MW of new energy generation.”²³ The discrepancy is 100 megawatts, both documents are the Commission’s, and the order is the operative instrument.

This correction reaches the present author’s own published work.

Turner_Georgia_Statewide_Report_v1_1 and its source file state 9,985 megawatts on the authority of the fact sheet, and footnote the variance by saying that public sources cite figures from about 9,885 to 9,985. The secondary sources at the bottom of that range match the order’s components. The choice of the fact sheet was defensible on what that report had and is wrong on what the order shows. It is corrected here and carried forward.²⁴

²⁰ Document 223493, Table 1.2 narrative at p. 2.

²¹ Document 224506, recommendation paragraphs 2 and 3 accompanying Table 3.

²² Document 224953, searched in full September 15, 2026.

²³ Georgia PSC, “Data Center Fact Sheet,” March 2026, 2 pp., <https://psc.ga.gov/site/downloads/datacenterfactsheet.pdf>, captured September 14, 2026.

²⁴ Georgia_Statewide_v1_0_source.md § IV.3 and Turner_Georgia_Statewide_Report_v1_1. The correction is recorded in full in Turner_GA_Statewide_FactSheet_Correction_2026-09-15.

2.4 The capacity basis, which two tables label two ways

Any figure in this certification has to be read against a basis, and the application uses two without defining either.

Table 1.3.3, on page 3, lists the three combined cycle projects under two columns headed Winter Capacity (MW) and Summer Capacity (MW): Bowen Units 7-8 at 1,561 and 1,482, Wansley Units 10-11 at 1,531 and 1,453, McIntosh Unit 12 at 797 and 757.²⁵ Table 1.3.4, on page 4, lists the same three under a single column headed Nominal Capacity (MW) as 1,482, 1,453 and 757.²⁶ Those are the summer figures under a different heading. The direct testimony of Lucy Metz, filed for Sierra Club and the Southern Alliance for Clean Energy, labels the same three numbers summer rated capacity.²⁷ That label is read from the witness's own table rather than from the application.

Table 1.2, covering the four purchase agreements, carries both bases in separate columns and the prose states the distinction for each facility in words.²⁸ So the application distinguishes nominal from winter where it chooses to. Searched in full on 15 September 2026 across documents 223493, 223492, 224479 and 224953, no document states a nominal rating, meaning an ISO or nameplate figure, for any combined cycle. The column headed Nominal Capacity carries the figures Table 1.3.3 of the same document labels summer.

The arithmetic settles which basis produced which headline, to the megawatt. The eleven battery and battery-plus-solar projects sum to 3,112.5 megawatts and carry one figure each with no seasonal split. Add the three combined cycle projects at summer, 3,692, and the four purchase agreements at nominal, 1,195, and the total is 7,999.5, printed as 7,999. Add the three at winter, 3,889, and the four at winter, 1,246, and the total is 8,247.5, printed as 8,248. The application states both: the Company "seeks certification of the 7,999 MW of nominal capacity, equivalent to approximately 8,248 MW of winter capacity."²⁹ The reconciliation above is this author's arithmetic on figures the application states; the application performs none of it. The two printed totals round in opposite directions, one truncated and one rounded up, which is a presentation artifact and not a discrepancy.

On that reconciliation the certified "nominal" total is a mixed-basis figure, and no document says so in terms: nominal for the four purchase agreements, summer for the three combined cycle projects, and season-neutral for the eleven storage projects.

The confusion is not confined to the Application. Staff's Table 12 heads its capacity column Nominal MW and gives Wansley Units 10-11 as 1,453 and McIntosh Unit 12 as 757, which are the summer figures, while giving Bowen Units 7-8 as 1,560, which is neither the summer figure of 1,482 nor quite the winter figure of 1,561.³⁰ Two independent documents apply the word nominal to summer figures for these plants, and the second is the ranking table the Commission's own staff used to sort them.

²⁵ Document 223493, Table 1.3.3 at p. 3, read from a page image rendered at 200 dpi.

²⁶ Ibid., Table 1.3.4 at p. 4, same method.

²⁷ Direct testimony of Lucy Metz on behalf of Sierra Club and the Southern Alliance for Clean Energy, Docket No. 56298, document 224479, filed November 12, 2025, 166 pp., trade secret Table 6. The label is read from the witness's own table rather than from the application.

²⁸ Document 223493, Table 1.2 and narrative at p. 2.

²⁹ Ibid., § 1.3.4 narrative at p. 4.

The Request for Proposals itself was run in winter capacity throughout. The application reports that the Competitive Tier “consisted of 257 proposals, totaling 9,808 unique MW of winter capacity,” and that the Short List “was composed of 21 proposals, totaling 8,248 MW of winter capacity.”³¹ The evaluation produced 8,248; the certification restated it as 7,999; the public conversation, following the fact sheet, uses a third figure, and the fact sheet states no basis for it.

A third thermal figure appears in Section 7.4: the three projects “would provide a total of more than 3,800 MW of capacity when fueled by natural gas” and approximately 2,460 MW on ultra-low sulfur diesel.³² Table 7.25 totals 3,692 on its nominal column.

The gap is the capacity basis again, and it resolves. Table 1.3.3 gives the three at winter and summer: Bowen 1,561 and 1,482, Wansley 1,531 and 1,453, McIntosh 797 and 757.³³ The winter column sums to 3,889 and the summer column to 3,692. “More than 3,800” is true of the winter total and false of the summer total, so Section 7.4 is speaking winter while Table 7.25 is speaking nominal, which for these three equals summer. The application does not label either, and the reconciliation is this paper’s arithmetic on figures the application states.

This paper uses 3,692 throughout because it is the certified table’s figure.

2.5 The one public cost number

Table 1.3.4 is headed “COP Projects Total Certified Cost Summary (\$000)” and lists the fourteen Company-owned projects with no purchase agreement among them. Its Total row reads: 6,804 | \$15,660,471 | REDACTED | REDACTED.³⁴ The fourteen per-project cells above it are redacted in all three cost columns.

So \$15,660,471 thousand, about \$15.66 billion excluding allowance for funds used during construction and ad valorem cost, is the certified capital estimate for fourteen Company-owned projects totaling 6,804 megawatts. Set against Vogtle Units 3 and 4, the largest recent capital project on this system, the certified portfolio is roughly three times the capacity. The Energy Information Administration gives each new Vogtle unit as 1,114 megawatts, so the pair is 2,228.³⁵ That is a capacity comparison only. No cost

³⁰ Document 224506, Table 12 at p. 31, compared with document 223493, Tables 1.3.3 and 1.3.4. The 1560 figure is one megawatt below the Application’s winter figure of 1,561 and is not reconciled by anything retrieved.

³¹ Ibid., § 3 (Bid Evaluation) at p. 9.

³² Ibid., § 7.4 at p. 40.

³³ Document 223493, Table 1.3.3 at printed p. 3, read from a page image rendered at 200 dpi. Winter column 1,561 plus 1,531 plus 797 is 3,889; summer column 1,482 plus 1,453 plus 757 is 3,692. The addition is this paper’s.

³⁴ Ibid., Table 1.3.4, read from a page image. Table 1.5, in the unnumbered attachment at PDF p. 112, is identical; the document’s printed numbering stops at p. 60.

³⁵ U.S. Energy Information Administration, “First new U.S. nuclear reactor since 2016 is now in operation,” August 1, 2023 (“The new 1,114 megawatt (MW) Unit 3 reactor...”), and “Plant Vogtle Unit 4 begins commercial operation,” May 1, 2024 (“the 1,114-megawatt (MW) Unit 4 nuclear power reactor”). Both captured September 15, 2026. The pair figure of 2,228 MW is arithmetic on the two stated per-unit

comparison is offered anywhere in this paper, because no Vogtle cost figure has been retrieved to this corpus's standard.

It is not the cost of the 7,999 megawatt portfolio. The application's summary sentence attaches the figure to the larger number while citing the smaller table, and a reader quoting "\$15.66 billion for 7,999 MW" would be repeating that sentence against the table it cites.³⁶ The four purchase agreements are priced in Table 4.4 in dollars per kilowatt-year, and every cell of that table is redacted.³⁷

The three combined cycle projects are 3,692 megawatts, or 54 percent, of the 6,804 megawatts behind the single public cost figure.

3. The statutory frame, and what it makes the sealed number do

Georgia's Integrated Resource Planning statute, O.C.G.A. Title 46, Chapter 3A, runs eleven sections. Four of them govern this certification and have to be read in sequence.

A note on provenance, because this corpus holds a standard and only one of the four meets it. Section 46-3A-7 has three renderings across two publishers agreeing word for word, and its history line reads "Code 1981, § 46-3A-7, enacted by Ga. L. 1991, p. 1696, § 1." Sections 46-3A-4, 46-3A-5 and 46-3A-6 have two renderings each, with § 46-3A-4(a) carried in full from the 2010 Georgia Code edition because the other rendering truncates it, and no history line was captured for any of the three.³⁸ The three are quoted here as corroborated secondary text; § 46-3A-7 is quoted as verified primary text.

The Commission sets how much cost detail it sees. Section 46-3A-4(c): "The utility's application for a certificate shall contain a cost-benefit analysis covering the estimated useful life of all capacity resource options considered in developing its current integrated resource plan. The estimated cost of the capacity resource proposed to be certificated shall be presented in such reasonable detail as the commission may require."³⁹

That sentence cuts against this paper's subject and belongs early. The level of cost detail in an application is committed by statute to the Commission's judgment. The redaction at issue is not a gap the statute forbids.

figures; neither article states it.

³⁶ Document 223493, § 1.3.4 narrative at printed p. 4: "the 7,999 MW of nominal capacity, equivalent to approximately 8,248 MW of winter capacity portfolio of PPAs and COP Resources with a total certified cost of approximately \$15,660.5 million, excluding AFUDC and Ad Valorem, as summarized in Table 1.3.4."

³⁷ Document 223493, Table 4.4 (PPA Annual Capacity Pricing, \$/kW-year) at printed p. 11.

³⁸ Statute captures in the deposited archive under statute/, taken September 15, 2026. § 46-3A-7: Justia current Georgia Code, Justia 2010 Georgia Code edition, and FindLaw, agreeing word for word; history line as displayed. § 46-3A-4: FindLaw current and Justia 2010, the latter carrying subsection (a) in full where FindLaw's display truncates it. § 46-3A-5: Justia 2010 in full and FindLaw current agreeing on the fragments it displays. § 46-3A-6: FindLaw current and Justia 2010, agreeing. A first rendering of the current Justia § 46-3A-7 page returned subsection (a) without its second sentence; two other renderings carry it and the omission was a fetch artifact.

³⁹ O.C.G.A. § 46-3A-4(c).

The certificate must describe the approved cost. Section 46-3A-5(b): “Each certificate shall describe the capacity resource, its approximate construction or implementation schedule, and its approved cost.”⁴⁰

The order discharges that by reference, and for both classes. Its second ordering paragraph: “the Company Owned Resources certified herein are certified at the amounts listed in Table 1.3.4 of the Application for the Certification of Capacity from the 2029-2031 All-Source RFP, and that PPAs certified herein are certified at the amounts listed in Table 4.4 of the Application for the Certification of Capacity from the 2029-2031 All-Source RFP. The Wadley BESS Supplemental Resource is certified at the cost shown on page 15 of the Application for the Certification of Supplemental Resource for 2028-2031 Capacity.”⁴¹ The Stipulation the order adopts uses the same device and names the term: “Each resource certified pursuant to this Stipulation is certified at its individual project cost (‘Certified Amount’) as identified in Table 1.5 of the Application for the Certification of Capacity from the 2029-2031 All-Source RFP and page 15 of the Application for the Certification of Supplemental Resources for 2028-2031 Capacity.”⁴² Table 1.5 is identical to Table 1.3.4.⁴³

Every cost cell in Table 1.3.4 is redacted. Every cell in Table 4.4 is redacted.

The narrow claim, and the only one this record supports: the statutory content requirement is discharged by reference, for both classes of resource, and the referenced content is not public in either case. Section 46-3A-5(b) does not say publicly, a certificate could describe a cost held under seal and satisfy the words, and no retrieved document construes the provision. The reading in this paragraph is the author’s.

Two things about that section belong here. The first is that it imposes three mandatory contents, not one: the order must adopt “a forecast of future Georgia retail electricity requirements of the utility,” must describe “in what manner the prospective certificate relates to the integrated resource plan,” and then “Each certificate shall describe the capacity resource, its approximate construction or implementation schedule, and its approved cost.” This paper is concerned with the third.

The second is that the provision was litigated against this order. On January 9, 2026 four intervenors filed a 592-page Joint Petition for Rehearing, Reconsideration, Clarification and Oral Argument, one heading of which reads: “The Commission’s Final Order is deficient as a matter of law for its failure to adopt ‘a forecast of future Georgia retail electricity requirements of the utility,’ as required by 46-3A-5(b).”⁴⁴ The petition pairs that with the general findings requirements at O.C.G.A. § 46-2-51 and § 50-13-17(b), the latter requiring that “Findings of fact shall be accompanied by a concise and explicit statement of the underlying facts supporting the findings,” and cites two unreported Georgia Superior

⁴⁰ O.C.G.A. § 46-3A-5(b).

⁴¹ Document 224953, second ordering paragraph.

⁴² Stipulation, Docket Nos. 56298 and 56310, document 224772, filed December 10, 2025, 4 pp., paragraph 3.

⁴³ Document 223493, Tables 1.3.4 and 1.5, compared from page images.

⁴⁴ Joint Petition for Rehearing, Reconsideration, Clarification, and Oral Argument on behalf of Georgia Interfaith Power and Light, Southface Institute, the Sierra Club, and the Southern Alliance for Clean Energy, Docket Nos. 56298 and 56310, document 225042, filed January 9, 2026, 592 pp., at printed p. 29. The brief proper runs printed pp. 1 to 35; the remainder is exhibits.

Court decisions for the proposition, neither of which this paper has read.⁴⁵ Both stipulating parties answered it, and they answered it differently.

Staff met the provision head on and read it as subordinate: “The Petitioners further assert that the Commission’s Final Order approving the Stipulation is deficient pursuant to O.C.G.A. § 46-3A-5(b) for failing to explicitly adopt a load forecast. However, no provision in § 46-3A-5, modifies the requirement in § 46-3A-4(a) that the Commission ‘shall’ issue a certificate provided the Company otherwise meets the requirements of that code section.”⁴⁶

Georgia Power did not meet it. Its 5,331-word response cites § 46-3A-4(a) six times and § 46-3A-5 not once. The argument it makes instead is that the forecast question was settled elsewhere: the growth at issue “is based on a forecasting model that the Commission has already found to be ‘based upon substantially accurate data and an adequate method of forecasting,’” citing the July 31, 2025 Order Adopting Stipulation in Docket Nos. 56002 and 56003.⁴⁷

The petitioners’ reply put the two responses against each other. On the forecast: “Georgia Power seems to argue that its load forecast from the 2025 IRP was adopted in this Certification Order. It was not. Rather, the Procedural and Scheduling Order explicitly required a new load forecast be filed in this proceeding.”⁴⁸ On the \$8.50 backstop, where Georgia Power called the commitment an added benefit rather than the basis for certification while Staff wrote that “By agreeing to . . . \$8.50 of downward pressure . . . the public is assured an economical and reliable supply of electric power”: “Georgia Power and Staff signed the Stipulation adopted by the Commission, yet they apparently disagree on its foundation, scope, and meaning.”⁴⁹

The order denying reconsideration reaches none of it. It is 582 words including the caption and the signature block, with three narrative paragraphs and four ordering paragraphs. It returns zero for

⁴⁵ Ibid. at printed pp. 27 to 28, citing *Southern Alliance for Clean Energy, Inc. v. Georgia Public Service Commission*, 2009 CV 170648 (Ga. Super. May 5, 2010), and *Ga. Power Co. v. Ga. Public Service Comm’n*, 1988 WL 391328 (Ga. Super. 1988). Both are unreported and neither was retrieved for this paper; they are cited here as authority the petitioners invoked, not as authority this paper has examined.

⁴⁶ Public Interest Advocacy Staff’s Response to Joint Petition for Rehearing, Reconsideration, Clarification, and Oral Argument, Docket Nos. 56298 and 56310, document 225155, filed January 20, 2026, at p. 5.

⁴⁷ Georgia Power Company’s Response to the Joint Petition for Reconsideration, Docket Nos. 56298 and 56310, document 225157, filed January 20, 2026. The document runs 5,331 words in its Word issuance file. Searched in full September 16, 2026: six occurrences of “46-3A-4,” zero of “46-3A-5.” The forecasting quotation is at its footnote 100, citing Order Adopting Stipulation, Docket Nos. 56002 and 56003, July 31, 2025, at 10, and O.C.G.A. § 46-3A-2(b)(1).

⁴⁸ Reply to Responses to Joint Petition for Rehearing, Reconsideration, Clarification, and Oral Argument, Docket Nos. 56298 and 56310, document 225211, filed January 23, 2026, at p. 3, citing the Procedural and Scheduling Order of August 5, 2025 at PDF p. 5 and O.C.G.A. § 46-3A-5(b).

⁴⁹ Ibid. at pp. 3 to 4. The Georgia Power phrase quoted there carries an em dash in the source, which this paper does not reproduce; the sense is that the commitment was an added benefit and not the basis for certification. The Staff quotation within it is from document 225155.

“forecast,” “46-3A-5,” “46-3A-4” and “757.”⁵⁰ It states no issue, summarises no argument, and makes no finding. What it states is a sequence: the Commission voted 3 to 2 to deny access to the trade secret designated financial workpapers, and then “Given the Commission’s decision to deny the Motion for access to the documents, Commissioner Advisory Staff recommended that the Motion for Reconsideration be denied as set forth in its written recommendation.” The Commission adopted that recommendation on the same 3 to 2 split.⁵¹ The written recommendation is not reproduced in the order and is not on either docket. Searched across all 215 entries in the two docket listings as they stood on September 16, 2026, no filing by Staff, Advisory Staff or the Commission between the February 3 hearing and the February 23 orders carries a recommendation on reconsideration. The document the order adopts is not public.

So § 46-3A-5(b) is not an unlitigated provision in these dockets. What is absent is any tribunal’s construction of it, and the body that was asked to construe it declined in seven paragraphs on a ground tied to the seal. The claim below is about the third of its three requirements, and no party raised that one.

The approved cost is the benchmark for everything that follows. Section 46-3A-7(a): “So long as the commission has not modified or revoked the certificate for an electric plant under Code Section 46-3A-6 and to the extent the utility seeks to add to its rate base upon completion of the plant construction costs that do not exceed 100 percent of those approved by the commission under Code Section 46-3A-5, Code Section 46-3A-6, or subsection (b) of this Code section, that construction cost amount may be excluded from the rate base only on the basis of fraud, concealment, failure to disclose a material fact, imprudence, or criminal misconduct. Inclusion of costs in excess of 100 percent of those approved by the commission shall not be permitted unless shown by the utility to have been reasonable and prudent.”⁵²

The section is a two-sided rule and both sides pivot on the approved cost. Below 100 percent of it, the costs enter rate base unless one of five findings is made against the utility. Above it, the burden inverts and the utility must show reasonableness and prudence. The threshold deciding which regime applies, and which party carries the burden, is the certified amount.

Subsection (c) goes further: “If the commission verifies expenditures as made pursuant to a certificated capacity resource, that verification forecloses subsequent exclusion of those costs from the utility’s rate base, absent fraud, concealment, failure to disclose a material fact, imprudence, or criminal misconduct.”⁵³ Subsection (b) supplies verification by inaction: the Commission verifies and approves or disapproves expenditures within 180 days of a progress report, and “If the commission fails to so act

⁵⁰ Order Denying GIPL, Southface Institute, Sierra Club, and Southern Alliance for Clean Energy’s Joint Petition for Reconsideration, Docket Nos. 56298 and 56310, document 225550, by Commission action at the Administrative Session of February 18, 2026 and filed February 23. Searched in full September 16, 2026.

⁵¹ Document 225550. The vote on the access motion and the vote on reconsideration are both recorded as 3 to 2, Commissioners Pridemore, Shaw and McDonald for, Commissioners Hubbard and Johnson against.

⁵² O.C.G.A. § 46-3A-7(a).

⁵³ O.C.G.A. § 46-3A-7(c).

within 180 days after such filing, the previous expenditures and any proposed revisions shall be deemed approved by operation of law.”⁵⁴

The exit returns the utility's money. Section 46-3A-6 lets the Commission reexamine a certificate and modify or revoke it where the resource “is no longer needed.” If the utility then cancels or abandons, it “may recover through any rate-making vehicle over a reasonable period of time, absent fraud, concealment, failure to disclose a material fact, imprudence, or criminal misconduct, the amount of its investment in such capacity resource, along with the cost of carrying the unamortized portion of that investment.”⁵⁵ Section 46-3A-7(d) does the same where the Commission disapproves proposed cost revisions and the utility cancels as a result.⁵⁶

No construction of these sections was found. A public web search on September 15, 2026 across the section numbers, and pairing them with Georgia Power, Vogtle, prudence and disallowance, located no reported Georgia appellate decision construing §§ 46-3A-4 through 46-3A-7. Two Georgia Power decisions surfaced and neither reaches Chapter 3A: the 1990 Court of Appeals decision predates the 1991 enactment of § 46-3A-7, and the 2009 decision turns on the Territorial Electric Service Act at § 46-3-4(4).⁵⁷ The bound travels with this claim wherever it appears in this paper: a public web search, not a Westlaw or Lexis search, and not a search of the Commission’s own order archive. It does not establish that no authority exists. It establishes that none is reachable by the routes a member of the public would use. It is also incomplete as a statement about this record. The intervenors’ reconsideration petition deployed § 46-3A-5(b) against this order and cited two unreported Superior Court decisions on the findings requirement, Staff answered on the statute and Georgia Power did not, and the Commission denied the petition without addressing any of it.

4. What was contested in the written record

The fuel arrangement was litigated. It was not overlooked by the parties.

Sierra Club and the Southern Alliance for Clean Energy filed the direct testimony of Lucy Metz on November 12, 2025, 166 pages with a complete text layer. Her fourth conclusion states the objection as to all three projects: building them now “will lock ratepayers into the current high cost of these assets, as well as the cost of firm gas transport, for decades to come.”⁵⁸ Her fifth conclusion turns to one plant in particular, opening “The costs of McIntosh are particularly high at [REDACTED] per kilowatt,” and states that “Firm gas transport and storage costs will add [REDACTED] in fixed costs each year over the plant’s 45-year lifetime, in addition to the cost of the fuel itself.”⁵⁹

⁵⁴ O.C.G.A. § 46-3A-7(b).

⁵⁵ O.C.G.A. § 46-3A-6. The section has no lettered subdivisions.

⁵⁶ O.C.G.A. § 46-3A-7(d).

⁵⁷ *Georgia Power Co. v. Georgia Public Service Commission*, 196 Ga. App. 572, 396 S.E.2d 562 (1990); *Georgia Power Company v. Georgia Public Service Commission*, Ga. Ct. App. No. A08A2106 (March 11, 2009). Search conducted September 15, 2026.

⁵⁸ Document 224479 at p. 9, summary of conclusions, conclusion 4.

⁵⁹ *Ibid.* at p. 9, conclusion 5.

Asked whether the cost estimates for the three include “all the potential costs associated with the units, including the cost of obtaining firm gas service,” Metz answers: “No, they do not. Georgia Power plans to obtain firm gas supply for the Bowen, Wansley, and McIntosh CCs, which will add substantial additional fixed costs to the cost of operating the units (TS Table 6). Georgia Power will pay a total of [REDACTED] dollars per year for firm transport and storage at the CC units, including [REDACTED] for Bowen Units 7-8, [REDACTED] for Wansley Units 10-11, and [REDACTED] for McIntosh Unit 12. These are costs that Georgia Power will pay each year over the units’ 45-year lifetimes and do not include the cost of the fuel itself.”⁶⁰

Her TS Table 6, headed “Gas firm transport costs at the proposed CC units,” survives in the public version as a grid of labels with every figure removed. The rows are Fixed fuel costs in millions of dollars per year, Firm transport cost, Storage cost, net present value of fixed fuel costs over the 45-year lifetime in millions of 2025 dollars, Summer rated capacity in megawatts, and net present value of firm fuel costs per kilowatt of summer capacity. One row survives, the capacity row: McIntosh 12 at 757, Bowen 7-8 at 1,482, Wansley 10-11 at 1,453, total 3,692. Every cost cell is blank.⁶¹

The table names its own sources on its face: the trade secret response to STF-PIA-8-5, “Georgia Power RFP - Gas Forecast Bid Summary 10-29-2024.xlsx,” and the trade secret response to STF-PIA-1-2.⁶² A further exhibit line records that the “Company Request for Proposal - Gas Forecast Bid Summary File has been redacted in its entirety.”⁶³

Georgia Power’s own discovery response, reproduced in Metz’s exhibits, says where the figure lives: “The firm transportation (‘FT’) costs are reflected in the RFP bid evaluation under the ‘Fixed Fuel’ category. The costs are input within the Firm Fuel Costs Inputs tab in the capacity evaluator spreadsheet.”⁶⁴

So the figure exists, the Company computed it, the Company carried it inside the evaluation that produced the certified portfolio, and an intervenor’s witness obtained it in discovery and tabulated it per plant.

Metz also states a proposition about how the plants will run: “Because they are designed to run at high capacity factors, CC units expose ratepayers to fuel price volatility.”⁶⁵ The application’s own Section 7.10 supports the premise without giving a plant-specific figure. It says combined cycle plants “achieve CFs in the range of 85% to 95%,” that in a cycling role “the CF would typically range from 40% to 70%,” that the proposed plants “are ideally suited for base load or cycling operation where they can achieve high-capacity factors,” and that “the capacity factor will be driven by economic dispatch.”⁶⁶

⁶⁰ Ibid. at p. 34, direct examination on the cost estimates.

⁶¹ Ibid. at p. 34, TS Table 6 (“Gas firm transport costs at the proposed CC units”), public version; the table is also summarised at p. 3.

⁶² Ibid. at p. 34, source line beneath TS Table 6.

⁶³ Ibid., exhibit LM-15 separator page.

⁶⁴ Ibid. at p. 124, exhibits, Georgia Power discovery response.

⁶⁵ Ibid. at p. 35.

⁶⁶ Document 223493, § 7.10 (Capacity Factors and Duty Cycle) at pp. 44-45.

The Commission’s own Staff contested the same arrangement, on the same day, and the paper missed it for twenty-four passes. Staff filed two panels in these dockets. The load forecast panel, Trokey, Drugan and Pol, is the one usually cited. The resource panel, Tom Newsome, Philip Hayet and Leah Wellborn, filed 87 pages on November 12, 2025, and devotes a subsection to firm transportation.⁶⁷

Staff states the risk in terms of what has not been built: “Staff is concerned that there are natural gas FT risks as pipelines would need to be constructed or modified by interstate pipeline companies on the timeline necessary to be able to supply the proposed CC resources.”⁶⁸

Staff states the cost as significant and withholds the figure in the running text: “Additional FT costs to supply natural gas to new CC capacity reflect a significant cost customers would be expected to pay. Again, Staff is not proposing any CC projects be certified; however the Company has requested the authority to construct five CC resources, and the FT costs it has proposed are significant, resulting in a cost of approximately \$xxx million per year as shown in Table 14.”⁶⁹

Table 14 is a second sealed firm transportation cost table, and its decomposition is finer than Metz’s. Headed “Company Proposed New FT Costs (\$million),” it survives in the public version as headings with every figure removed. Its columns are Facility Name, Transport Pipeline, Fixed Intrastate FT Cost (Annual), Fixed Lateral FT Cost (Annual), Fixed Storage Cost (Annual), and Total Cost (Annual). Its rows are Bowen Unit 7-8, Wansley Unit 10-11, McIntosh Unit 12, and Total FT Cost (Company).⁷⁰

Metz’s TS Table 6 separates fixed fuel, firm transport and storage. Staff’s table splits transportation itself in two: what the interstate pipeline is paid to deliver gas to a point, and what the lateral costs to carry it from that point to the plant. Neither component is public for any of the three units.

The Transport Pipeline column is also blank. The Application at Section 7.4 names Transco for Bowen and Wansley and Southern Natural Gas for McIntosh, in public text.⁷¹ Staff’s tabulation of the same three facilities withholds the same fact. The seal in this docket is not applied to a consistent set of facts.

One sized fact about the transportation arrangement is public, and it is Staff’s. On the spur that would serve Bowen: “It appears the Company has entered into a pipeline Precedent Agreement that will provide an excess amount of gas needed for the two Bowen CC units it has proposed. The current Precedent Agreement for the Dalton lateral reflects a build-out equivalent to four CC units. Staff recommends the Company provide additional clarity on its intentions to acquire FT capacity for the Bowen Units and explain if it will be contracting for more FT capacity than needed for the two proposed Bowen CC Units.”⁷²

⁶⁷ Direct Testimony of Tom Newsome, Philip Hayet and Leah Wellborn on behalf of the Public Interest Advocacy Staff, Docket Nos. 56298 and 56310, document 224506, filed November 12, 2025, 87 pages, public version. The firm transportation subsection sits within Staff’s treatment of the Company Owned Project thermal resources.

⁶⁸ Ibid.

⁶⁹ Ibid. The redaction appears in the running text as printed.

⁷⁰ Ibid., Table 14. Column and row headings reproduced from the public version; every value cell, including the Transport Pipeline column, is blank.

⁷¹ Document 223493, § 7.4 (Fuel Use) at printed p. 40.

Two Bowen units are certified. The agreement is sized for four.

Staff also modelled the plants at a capacity factor ceiling: its MGO-111 case was set up “to limit CC units to a 40% annual capacity factor,” and Staff records that “The 40% annual capacity factor limit for gas turbines in the MGO-111 case results in a higher capacity need than other two cases (HGO and MGO). If EPA Rule 111 were to be overturned, CC additions may not be economically optimal.”⁷³

A correction to this paper’s own method, recorded because the convention is what makes the negatives usable. An earlier draft of this research bounded a negative to “Staff’s four testimony files.” That sentence was true of the four files and useless as a statement about Staff, because those four files were one of Staff’s two panels. Every negative in this paper is bounded to named documents and named search terms, and the bound held: nothing false was published. What failed was the assumption that a party files one panel. The rule this adds: the bound on a party-scoped negative is taken from the docket listing, not from what the retrieval happens to hold.

The written filings that followed do not reach her figures. Searched in full, Georgia Power’s rebuttal testimony of November 26, 2025, comprising a Main Panel and a COP Projects Panel, contains no occurrence of “firm gas,” “firm transport,” “firm transportation,” “gas transport,” “gas supply,” “fixed fuel,” “fuel cost,” “storage cost,” “capacity factor,” “heat rate,” “transportation contract,” “Transco,” “Southern Natural,” or “dekatherm.”⁷⁴ The search was bounded to those two documents and those fourteen terms. The rebuttal names Metz twelve times and answers her on the scope of the evaluation, the absence of combustion turbine plus solar bids, the portfolio approach, and the large load tariff.

Georgia Power’s post-hearing brief likewise contains no occurrence of “fixed fuel,” and none of “McIntosh,” “Bowen” or “Wansley.” It names Metz eight times and answers her on planning versus executed contracts and on re-evaluation against a theoretical portfolio.⁷⁵ The search was bounded to that document and those terms.

What this paper cannot say. It cannot say the Company never answered. The three hearing transcript entries in these dockets carry no downloadable files, and Georgia Power’s post-hearing brief cites this proceeding’s transcript at pages 148 through 1399, so a hearing record exists and is not public here.⁷⁶ That search was bounded to the docket listings as they stood on September 14, 2026. Every negative in this section is bounded to named written filings and to named search terms, and none of them reaches the hearing.

⁷² Document 224506.

⁷³ Ibid. MGO-111 is Staff’s reproduction of the Company’s MGO-111 Generation Mix study case.

⁷⁴ Georgia Power Company rebuttal testimony, Docket No. 56298, document 224672, filed November 26, 2025, Main Panel and COP Projects Panel. Searched September 15, 2026 and re-run September 16 against an extraction joining split runs and including footnotes.

⁷⁵ Georgia Power Company post-hearing brief, Docket No. 56298, document 224871, filed December 16, 2025. Searched September 15, 2026 and re-run September 16 against the same fuller extraction.

⁷⁶ Docket listings for 56298 and 56310, enumerated September 14, 2026; transcript entries 224439, 227256 and 227257 carry no downloadable files. Transcript page citations are from document 224871 and from the Georgia Interfaith Power and Light post-hearing brief, document 224874.

A method note belongs in the text because it nearly produced a false sentence in this paper. In these filings the word “pipeline” almost always means the economic development pipeline of prospective load, not a gas pipeline: the Main Panel rebuttal’s two hits are “over 50,000 megawatts of projects in the economic development pipeline” and “risk-adjusts project loads in the economic development pipeline.” The word “lateral” matches inside “collateral,” and the two hits in that document are “requiring customer collateral at execution” and “collateral requirements.” Every hit in this docket has to be read before it is counted.⁷⁷

5. What the seal covers, and what it does not reach

5.1 The affidavit over the All-Source filing

Every redaction in the All-Source filing rests on a single instrument, and it sits ahead of the table of contents. The transmittal letter states it: “This filing is covered by the trade secret rules of the Commission, as explained in the enclosed document regarding the basis of assertion. The trade secret versions of the Application and accompanying attachments have been provided to the Commission Staff.”⁷⁸

The enclosed document is headed “Affidavit and Basis for the Assertion That Redacted Portions of Georgia Power Company’s Application For the Certification of the All-Source Capacity RFP Power Purchase Agreements and Company-Owned Proposals are Protected as Trade Secret,” and invokes Commission Rule 515-3-1-.11.⁷⁹ The assertion runs to redacted portions, not to documents, which is why the four purchase agreements in Appendix A are public.

That rule sets what the affidavit has to contain. Rule 515-3-1-.11(1)(c) requires the filer to state the legal and factual basis for the assertion “including, for each item claimed to be a trade secret,” why the information derives economic value from not being generally known, how others can obtain economic value from its disclosure, and the procedures used to maintain secrecy.⁸⁰ Both affidavits in these dockets state their grounds by category of information rather than item by item. Whether that satisfies the rule is a question no retrieved document addresses, and this paper does not answer it.

Its reach is Docket 56298. The Supplemental Resources filing in Docket 56310 carries a second, separate assertion under the same rule, and its operative paragraphs are materially identical: the same list of redacted PPA terms, the same Company-owned paragraph, the same stated harms down to the sentence about vendors pricing to “the Company’s expected costs or recently approved costs,” and the same secrecy procedures.⁸¹ Its opening definition of the protected information is wider, adding supporting cost benefit analyses, development timelines, economic analyses, financial data, technology

⁷⁷ Document 224672, Main Panel rebuttal.

⁷⁸ Document 223493, transmittal letter of Jeremiah Haswell, Director of Regulatory Affairs, July 30, 2025.

⁷⁹ *Ibid.*, affidavit at pp. ii-iii.

⁸⁰ Ga. Comp. R. & Regs. r. 515-3-1-.11(1)(c). Three renderings across two publishers, all word for word identical: Justia’s Georgia regulations captured September 15, 2026; the Georgia Secretary of State’s Georgia Administrative Code at the Subject 515-3-1 page, fetched September 16, 2026, which is the publisher the Commission’s own site points to; and an Internet Archive capture of that same page from February 26, 2021, which also shows the text unchanged over the intervening five years.

screening assumptions and generic technology and resource cost information. Two instruments, one rule, one set of reasons.

For the purchase agreement class the affidavit names what is withheld: “the redacted terms of each PPA containing pricing, performance security, liquidated damages, contracted energy amounts, technology-specific technical specifications, and other delivery parameters that are specific to the winning bids.”⁸² The stated harm is competitive: counterparties would “use this information to set a floor for prices,” there would be “a chilling effect on the competitiveness and participation in future RFPs,” and “parties to the PPAs have agreed to maintain the confidentiality of these terms.”⁸³

For the Company-owned class it names something different: “detailed, project specific information regarding certain Company-owned proposals, including sensitive pricing information, operational data and assumptions, and confidential terms and conditions included within the Company’s EPC and equipment supply contracts.”⁸⁴ The stated harm is stated in terms that reach approved cost figures directly: “if revealed to the public, a supplier or vendor could use the trade secret portions of the Information to tailor proposals with the intention of pricing products to match the Company’s expected costs or recently approved costs, limiting Georgia Power’s ability to secure the best cost resources for customers.”⁸⁵ A third paragraph reaches the evaluation itself: “competitively sensitive cost information related to available technology options, processes and data used by Georgia Power in analyzing resource addition schedules, financial data used in the Company’s resource analyses, and other confidential details including data supporting resource economic evaluations.”⁸⁶

That “recently approved costs” clause is the affidavit’s own answer to the question this section would otherwise raise. The Company asserted that publishing an approved cost figure would let vendors price to it, and the Commission accepted the filing. Nothing retrieved states which specific redactions the Commission accepted on which specific ground. The paper records the assertion rather than evaluating it.

5.2 One filing, two outcomes

Class	Instrument	Docket	Pages	“REDACTED” tokens
Purchase agreement	Sandersville pro forma CT PPA	56298	114	62
Purchase agreement	Mid-Georgia Cogeneration pro forma CC PPA	56298	122	78
Purchase agreement	Dahlberg pro forma CT PPA	56298	115	42
Purchase agreement	Harris pro forma CC PPA	56298	114	62

⁸¹ “Affidavit and Basis for the Assertion That Redacted Portions of Georgia Power Company’s Application For the Certification of Supplemental Resources for 2028-2031 Capacity are Protected as Trade Secret,” filed with document 223492, 3 pp. The public PDF carries no text layer and was read from page images rendered at 180 dpi. It invokes the same Commission Rule 515-3-1-.11.

⁸² Document 223493, affidavit at p. ii.

⁸³ Ibid.

⁸⁴ Ibid., pp. ii-iii.

⁸⁵ Ibid., p. iii.

⁸⁶ Ibid.

Company-owned	All-Source Application, public version	56298	116	6,978
Purchase agreement	Tenaska Heard County CT PPA, separate assertion	56310	155	55

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The token count is a coarse measure and is offered as one. It counts how many cells and clauses were blacked out, not how much substance each blackout removes, and a single redacted Total row removes more than a hundred redacted liquidated-damages clauses. The substantive finding rests on what is missing.

What is missing is specific. Tables 1.3.4 and 1.5 redact the Certified Estimate, the AFUDC and Ad Valorem Cost, and the Total Cost for each of the fourteen Company-owned projects, leaving only the mixed aggregate at the Total row. Table 4.4 redacts every capacity price for all four purchase agreements. Table 5.25, covering nine standalone battery projects totaling 2,763 megawatts, redacts every cost cell and its Total row. Table 6.25, covering two battery-plus-solar projects totaling 350 megawatts, does the same. Table 7.25, covering the three combined cycle projects totaling 3,692 megawatts, does the same.⁸⁸ The three subtotals as printed sum to 6,805 against the grand total of 6,804, a one-megawatt rounding artifact arising from Hammond Phase II at 192.5 megawatts.

The consequence is arithmetic. Within the public filings of these two dockets the certified cost of the three combined cycle projects cannot be read directly, cannot be aggregated from parts, and cannot be obtained by subtracting the storage classes from the one surviving total, because those subtotals are sealed at their total lines as well. What is established is that those three routes are closed. That no fourth route exists is the author's inference.

5.3 The access fight, which was about something else

Two Trade Secret Access Orders issued in these dockets by Commission action at the Administrative Session of February 18, 2026. The second is a corrected order narrowing the petitioners from four to two. Both deny the petition.⁸⁹

Their subject is stated in the caption: whether the petitioners should be granted access to "Trade Secret Designated Large Load Revenue Requirement Financial Workpapers Used in Support Of, Or Otherwise Relied On, For the Stipulation."⁹⁰ That is the material behind the Stipulation's revenue floor, and behind

⁸⁷ Counts are of the literal token "REDACTED" in each document's extracted text layer, taken September 15, 2026 from the public versions filed in Dockets 56298 and 56310.

⁸⁸ Document 223493, Tables 1.3.4, 1.5, 4.4, 5.25, 6.25 and 7.25, read from page images rendered at 200 dpi.

⁸⁹ Georgia PSC Docket Nos. 56298 and 56310, Order Denying GIPL, Southface Institute, Sierra Club, and Southern Alliance for Clean Energy's Joint Petition for Access to Trade Secret Information Under a Non-Disclosure Document, document 225549; and Corrected Order Denying GIPL and Southface Institute's Joint Petition, document 225589. Both by Commission action at the Administrative Session of February 18, 2026.

⁹⁰ Ibid., caption.

Attachment A, whose Minimum Large Load Revenue row for 2029, 2030 and 2031 is blank in the public version.⁹¹

The route was a limited hearing on February 3, 2026, held on the Chairman's December 19, 2025 ruling under Rules 515-1-1-.02 and 515-3-2-.11(3), a citation that does not resolve,⁹² with a Georgia Power witness panel giving direct testimony and taking cross examination from counsel for Georgia Interfaith Power and Light.⁹³ The test: "whether 'the potential for economic harm to [Georgia Power] outweighs the public benefit derived from allowing [GIPL] access to such information' under an NDA."⁹⁴ The panel described the material as "the information the Company uses to provide complex pricing offers to potential data centers."⁹⁵

The motion to deny passed 3 to 2. Commissioners Pridemore, Shaw and McDonald voted in the majority; Commissioners Johnson and Hubbard voted in the minority.⁹⁶

Searched in full, neither order mentions the combined cycles, the thermal projects, Table 7.25, Table 1.3.4, firm transportation, or any pipeline.⁹⁷ The search was bounded to those two documents. No access proceeding over the cost-table redactions was located in either docket as those dockets stood on September 14, 2026.

So a contested hearing, a stated legal test and a divided vote appear in this record over a different body of material. The redaction that seals the figure § 46-3A-7 makes the benchmark drew none of them.

5.4 Where the 299 redactions in the five agreements sit

The five agreements carry 299 redactions between them. Categorised by the contract heading each one sits under, they fall into eight places, and Appendix D publishes the census with its method.⁹⁸

One hundred and nine of the 299 are the capacity price, at § 1.5, where the surrounding text names the item it withholds: "first Annual Period will be \$REDACTED/kW-year and will increase per Table B-2

⁹¹ Stipulation, Attachment A ("Minimum Large Load Revenue"), public version.

⁹² Ga. Comp. R. & Regs. Subject 515-3-2, captured 16 September 2026 from the Georgia Secretary of State's Georgia Administrative Code at rules.sos.ga.gov/GAC/515-3-2 and 15 September 2026 from Justia. Both list the subject as RESIDENTIAL ELECTRIC AND GAS UTILITY SERVICE DISCONNECTIONS with six rules, .01 through .06, and neither contains a Rule 515-3-2-.11. Discussed at section 8.

⁹³ Documents 225549 and 225589.

⁹⁴ Ibid., quoting the test applied in the Chairman's motion.

⁹⁵ Ibid., summarizing the Georgia Power witness panel.

⁹⁶ Ibid.

⁹⁷ Ibid., searched in full September 15, 2026.

⁹⁸ Redaction census, Appendix D to this paper, built September 16, 2026. Each public-disclosure PDF was extracted with pdftotext -layout; every occurrence of the token REDACTED was captured with its line context and the nearest preceding contract heading. Per-document totals reconcile to the raw token counts: 62, 42, 62, 78 and 55.

(Annual Capacity Price).⁹⁹ That is the same quantity the order seals at Table 4.4, which certifies the purchase agreements at PPA Annual Capacity Pricing in dollars per kilowatt-year. The price is sealed in the contract and sealed again in the certificate.

Sixty-nine are the energy payment calculation at Exhibit C, including every cell of a startup matrix carrying fuel and operations rates at hot, warm and cold states. Fifty-four are technical limits at Exhibit D, chiefly minimum output in megawatts by operating configuration. Fifteen are the guaranteed heat rates at Exhibit F, and **all five agreements are affected there**, which is what closes the arithmetic: the daily fuel cost formula is public and prices delivery against a published tariff, but the heat rate that turns it into a cost per megawatt-hour is not.¹⁰⁰

Two of the eight categories are worth naming separately because they are not prices.

Exhibit A, the facility description, carries 29. They include the air permit identifier, fuel oil storage capacity in gallons, the upper limit on fuel oil, maximum hourly fuel oil consumption, the purchase price per gallon, and in the Tenaska agreement the greenhouse gas emission rate: “GHG Rate Either: (i) regarding CO₂, REDACTED lbs. of CO₂ / MMBtu if operating on Natural Gas and REDACTED lbs. of CO₂ / MMBtu if operating on Fuel Oil.”¹⁰¹ A carbon dioxide rate in pounds per million British thermal units is a physical fact about a permitted facility. This paper makes no claim that its designation was improper, and § 46-3A-4(c) commits the level of detail to the Commission. The observation is that the seal in these agreements is not confined to commercial terms.

And one redaction sits inside the fuel cost allocation itself. Section 11.2.1, Gas Supply Plan Costs, is word for word identical across all five and reads in four of them: “Except as provided in this Part 11 (Fuel Supply Allowances), GPC will bear all costs incurred under the Gas Supply Plan.” **In bid 269-06 alone a sentence stands at the head of that provision and is removed:** “11.2.1. Gas Supply Plan Costs. REDACTED. Except as provided in this Part 11 . . .”¹⁰² One of the five carries an additional term about who bears gas supply plan costs. What it says is not public.

6. What the order wrote down

The Order Adopting Stipulation and Granting Certification of Capacity runs 265 paragraphs in its issuance text and nine ordering paragraphs. They are, in order: adoption of the Stipulation and grant of certification for the named resources; certification at the Table 1.3.4 and Table 4.4 amounts; the base rate case obligation; construction monitoring; the \$2.65 per kilowatt-year collection on the purchase agreements, an adder over and above the contract price that the Company is permitted to collect for

⁹⁹ Bid 303-01, § 1.5 (Capacity Pricing), and the equivalent provision in each of the other four.

¹⁰⁰ Exhibit F (Guaranteed Heat Rates) in each of the five. The form of the redaction differs: 269-06 removes nine items including the interpolation rule and the average heat rate formula’s right-hand side; 269-07 removes the right-hand side of “Guaranteed Heat Rate (in MMBtu/MWh) = REDACTED”; 303-01 and 311-01 remove lettered subparagraphs A and B whole; Tenaska removes the exhibit’s content.

¹⁰¹ Tenaska Heard County CT PPA, document 223492, Exhibit A (Facility Description and Additional Details).

¹⁰² Bid 269-06, Part 11 § 11.2.1, compared line by line against the same provision in 269-07, 303-01, 311-01 and the Tenaska agreement on September 16, 2026. The four unredacted renderings are word for word identical to each other.

the term; the load flexibility collaborative; adoption of the preceding findings; retention of jurisdiction “for the purpose of entering such further order or orders as this Commission may deem just and proper”; and the paragraph on reconsideration.¹⁰³

Searched in full against nineteen fuel and pipeline terms, the order returns zero.¹⁰⁴ The search was bounded to that document and those nineteen terms. It names no pipeline company, states no capacity factor, and does not use the phrase firm transportation. The application names the pipelines; the order does not.

The order also contains no percentage of any kind. Searched in full, it returns zero occurrences of the word “percent” and zero of the character “%.”¹⁰⁵ The search was bounded to that document and those two strings.

One of those nine paragraphs was asked to carry the fuel and does not. Construction monitoring is the only ongoing reporting obligation the order imposes on the three combined cycle units, and it is the place Staff asked for the transportation to be tracked.

Staff’s thirteenth recommendation, filed November 12, 2025: “Staff recommends the Company be required to comply with additional reporting and construction monitoring requirements. Staff recommends monitoring requirements for the COP thermal projects be consistent with what was required for the recent Yates CT project, and the reports the Company files should include details regarding the status of third party firm transportation (‘FT’) of natural gas to insure the Company’s natural gas resources can be dispatched to meet system peak demands reliably and economically.”¹⁰⁶

Staff put the same request a second time, with more specificity: the Company “should include in construction monitoring reports status update information regarding third party FT pipeline construction / modifications, and Company-Owned lateral pipeline projects necessary to supply gas to the CCs. The status updates should include information regarding the status of FERC pipeline approvals.”¹⁰⁷

The Stipulation filed twenty-eight days later takes the first half of that recommendation and not the second. Its paragraph 5: “Construction monitoring shall occur for all Company-Owned Projects (‘COP’) and will be implemented according to the process and procedures used for Plant Yates Units 8-10 (for the COP thermal projects) . . . The Company shall determine its means and methods of managing these projects and it may file its periodic monitoring reports on a portfolio basis.”¹⁰⁸ The Yates framework Staff asked for is there. The firm transportation reporting Staff asked for inside it is not.

¹⁰³ Document 224953, ordering paragraphs 1 through 9.

¹⁰⁴ Ibid., searched September 15, 2026 against the nineteen fuel and pipeline terms recorded in the retrieval log.

¹⁰⁵ Ibid.

¹⁰⁶ Document 224506, Staff recommendation 13.

¹⁰⁷ Ibid.

¹⁰⁸ Stipulation, Docket Nos. 56298 and 56310, document 224772, filed December 10, 2025, paragraph 5.

The order's fourth ordering paragraph reproduces Stipulation paragraph 5 substantially verbatim, substituting "Order" for "Stipulation" and adding the timing rule for certified-amount revisions and the sentence that each project will be examined individually for potential disallowances.¹⁰⁹

Searched in full, the Stipulation returns zero occurrences of "transport," "pipeline," "FERC," "lateral" and "Dalton." So does the order.¹¹⁰ The searches were bounded to those two documents and those five terms.

The framework that paragraph 5 does adopt was read, and it does not supply the missing piece. The Stipulation incorporates by reference the process and procedures used for Plant Yates Units 8-10. Those come from the Commission's order of August 29, 2024 in Docket No. 55378, which approves the monitoring program "in accordance with the filed testimony of Staff Witness Roetger" and sets it out in full: six elements, running from monthly filings and site access to a list of roughly forty document and report types.¹¹¹ The list is engineering, procurement, construction and cost control. It runs from the Project Execution Plan and the Level III Integrated Project Schedule through commodity release curves, craft staffing curves, cost and schedule performance indicators and the risk register.

Searched in full, the Yates order returns zero occurrences of "firm transport," "transport," "pipeline," "FERC," "lateral" and "gas supply." Roetger's underlying testimony, searched on the same terms, returns one "pipeline" and one "lateral," and both are the same passage: a quoted hearing exchange in which the Company's chief financial officer says the Yates estimate covers "a small gas lateral from the location to a larger pipeline" and that an underestimate of that cost "is on the company."¹¹² Neither document contains a gas transportation reporting element of any kind.

The Yates reports as actually filed say the same thing, and they say it in a more useful way. Two have been filed, the second in August 2025 and the third in February 2026, in Docket No. 55931 rather than in

¹⁰⁹ Document 224953, ordering paragraph on construction monitoring, compared line by line against Stipulation paragraph 5 on September 16, 2026.

¹¹⁰ Stipulation, document 224772, 837 words, and document 224953, 5,229 words, both searched September 16, 2026 in their Word issuance text against "transport," "pipeline," "FERC," "lateral" and "Dalton." All eight occurrences of "firm" in the order are "firm capacity, firm energy, and ancillary services" in the purchase agreement descriptions.

¹¹¹ Order Granting Certification of Plant Yates Units 8-10, Georgia PSC Docket No. 55378, document 219790, Commission action at the Administrative Session of August 20, 2024 and filed August 29, 2024, 3,334 words in its Word issuance file. The monitoring ordering paragraph reads: "Georgia Power Company will file semi-annual construction monitoring reports from the date construction begins through the date of commercial operation and that the construction monitoring program recommended by Staff is approved and shall be implemented in accordance with the filed testimony of Staff Witness Roetger." Searched in full September 16, 2026.

¹¹² Public Disclosure Direct Testimony and Exhibit of Steven D. Roetger on behalf of Commission Staff, Docket No. 55378, document 219136, filed June 21, 2024, 4,556 words. Searched September 16, 2026 against "firm transport," "FT," "transport," "pipeline," "FERC," "lateral," "gas supply" and "natural gas": one hit for "pipeline" and one for "lateral," both in the quoted March 24, 2024 hearing exchange with Vice-Chairman Echols. The Yates gas lateral is Company-built and inside the certified construction estimate; the firm transportation at issue in these dockets is third-party interstate capacity, which is a different thing, and this paper draws no equivalence between them.

the certification docket.¹¹³ Each runs about 2,200 words and each carries a subsection headed **Gas Lateral** under the Owner's Scope: the engineering firm, the pipeline contractor, the construction start, and in the third report "Mechanical completion for the gas lateral was achieved in December 2025. Commissioning is expected to complete in February 2026 to support fuel gas availability in March 2026."¹¹⁴

Searched in full, neither report returns a single occurrence of "firm transport," "FT," "transport," "FERC" or "gas supply."¹¹⁵

So the framework reports the gas infrastructure the Company builds and nothing about the gas transportation the Company contracts for. That is precisely the line Staff's recommendation 13 drew: monitoring consistent with Yates, and, added to it, the status of *third party* firm transportation.

So the second half of that recommendation was not redundant. Staff asked for the Yates framework **and** for third party firm transportation status inside it, because the Yates framework carries the Company's own lateral and not the interstate capacity behind it. The Stipulation took the first and not the second.

Staff is the party whose own testimony calls the transportation cost significant and whose own Table 14 computes it per unit. Staff signed the Stipulation. The reports that will govern three combined cycle units from groundbreaking to commercial operation will not state the status of the gas that runs them.

The retention-of-jurisdiction paragraph is the only forward-looking remedial authority in the order. It is unbounded in time and unenumerated in content.

7. The explainer that does not match the order

The Commission publishes a two-page Data Center Fact Sheet dated March 2026. Four of its statements can be checked against the instruments it explains. None survives intact.

The total. The fact sheet says 9,985 megawatts. The order's two components sum to 9,885. Section 2.3 above.

The share. The fact sheet says "approximately 80 percent of which is expected to power data centers." The order states no percentage of any kind.¹¹⁶ The search was bounded to that document. This does not make the share wrong. It makes the fact sheet the only source for the figure that this paper located in

¹¹³ Yates Units 8-10 Second Semi Annual Construction Monitoring Report, Georgia PSC Docket No. 55931, document 223704, filed 15 August 2025; Third Semi Annual Construction Monitoring Report, document 225433, filed 16 February 2026. Both public disclosure versions, both deposited. The reports are filed in Docket 55931 and not in the certification docket 55378.

¹¹⁴ Document 225433 at its Owner's Scope Progress section, subheading Gas Lateral. The second report at document 223704 names Pond & Company Engineering as designer and Southeast Connections as the pipeline contractor, with construction beginning June 2025.

¹¹⁵ Both reports searched in full on 16 September 2026 against "firm transport," "FT," "transport," "FERC" and "gas supply": zero in each. "Lateral" returns five in each and every occurrence is the Company's own gas lateral.

¹¹⁶ Ibid.

either docket, stated in the same sentence as the total the order's own components contradict. No survey of Commission publications outside these two dockets was conducted.

The backstop. The fact sheet says Georgia Power “agreed to financially ‘backstop’ costs associated with the new energy production through 2031,” and that “if data center contracts do not materialize at the expected levels, Georgia Power will pay associated costs through 2031.”¹¹⁷

The Stipulation paragraph it describes says something else. Paragraph 4: “The Company agrees to file its next base rate case in a manner that will ensure the incremental revenue from large load customers has downward pressure of at least \$8.50 per month to the typical residential customer using an average of 1,000 kWh per month for the years 2029, 2030, and 2031. The incremental revenue forecast as shown in Attachment A to this Stipulation will be set as a minimum estimate for the years 2029, 2030, and 2031.”¹¹⁸ That is an obligation about how a future rate case is structured. It does not oblige the Company to absorb the capital cost of a certified project, and the Stipulation’s cost provisions run the other way: paragraph 3 certifies each resource at its individual project cost, and paragraph 6 preserves ordinary individual-project examination “for purposes of evaluation of potential disallowances.”¹¹⁹

Three Commission sources characterize that paragraph and all three call it revenue. The Stipulation’s own text. The order’s summary of Staff witness Robert Trokey: “The Stipulation requires Georgia Power to backstop projected revenues from large load customers from 2029-2031.”¹²⁰ And the Chairman’s motion in the Trade Secret Access Orders: “the Stipulation provisions on the revenue floor and the \$8.50 are more than sufficient to ensure that.”¹²¹ The fact sheet’s cost backstop stands alone against all three.

The distinction is not semantic. A revenue floor obliges a filing; it does not move certified capital cost off rate base, and §§ 46-3A-7(a) and (c) state what would be required to move it. That reading of the two instruments is the author’s.

The remedies window. The fact sheet says that if contracts for the full capacity are not in place “by the end of this calendar year, the Commission will have five years to implement several remediating actions,” and lists four: suspend unstarted projects, close other plants early, end out-of-state purchase power agreements, and direct sale of excess electricity on the open market.¹²²

The Stipulation contains none of it. Its operative text is eight numbered paragraphs and, searched in full, it returns zero occurrences of backstop, five, remedi, suspend, surplus, sell, retire, early and 80.¹²³ The search was bounded to that document and those nine strings. The order is a more complicated case, and the paper had it wrong. “Five” appears three times, twice for the five NextEra battery agreements and once for “five combined cycles”; “retire” once, for the postponed retirements at Scherer 3 and

¹¹⁷ Georgia PSC, “Data Center Fact Sheet,” March 2026.

¹¹⁸ Stipulation, paragraph 4, quoted in full.

¹¹⁹ Ibid., paragraphs 3 and 6.

¹²⁰ Document 224953, summarizing the hearing testimony of PIA Staff witness Robert Trokey.

¹²¹ Documents 225549 and 225589, quoting the Chairman’s motion.

¹²² Georgia PSC, “Data Center Fact Sheet,” March 2026.

¹²³ Stipulation, searched in full September 15, 2026.

Gaston; “early” once, for resources “available as early as 2028”; and “sell” once, inside the recitation of O.C.G.A. § 46-3A-3(a). “Suspend,” “surplus” and “out-of-state” return zero.¹²⁴ But the Order’s findings of fact state that the Stipulation protects ratepayers “including: Ensuring downward pressure on rates in 2029, 2030, and 2031; providing sufficient time to take remedial actions to protect ratepayers if the expected executed contracts do not materialize in 2026; certifying resources on plant level; and, prohibiting Georgia Power from requesting cost increases until 6 months prior to the project’s estimated date of completion.”¹²⁵ So the Order does contemplate remedial action on a 2026 contract trigger, which is the fact sheet’s trigger. What the Order does not state is a five-year window, or any of the four specific actions the fact sheet lists. An earlier version of this paper asserted that the Order contained none of it, on a search that used the stem “Remediat” where “remedi” was the right one. The correction is recorded here rather than made silently.

Chapter 3A does contain a revocation power resembling the first of the four. Section 46-3A-6 lets the Commission revoke where a resource is no longer needed. Its statutory consequence, quoted in Section 3, is that the utility recovers its investment plus carrying cost absent one of the five findings. The exit exists. On the statutory text it is not a route by which ratepayers avoid the spend. That is a reading of the text, and no Georgia authority construing § 46-3A-6 was located.

One further defect belongs here because it is the present author’s own. The fact sheet’s trigger is “by the end of this calendar year,” which for a March 2026 document is December 31, 2026. Turner_Georgia_Statewide_Report_v1_1 renders it “by the end of the period,” which in its surrounding paragraph reads as 2031. That report moved a deadline five years. It is corrected here.¹²⁶

What does survive the audit is the \$8.50 figure. The Stipulation and the order’s third ordering paragraph state it in identical words for 2029, 2030 and 2031.¹²⁷ The order’s narrative paragraph renders it “at least \$8.50 cents per month,” mixing the dollar sign with the word cents; the operative text is unambiguous.

8. What this shows, and what it does not

Five gas purchase agreements were certified in these two dockets, all of them for plants already operating.¹²⁸ All five are public. Every one names the interstate pipeline, names the transportation zones, in three of the five identifies a specific delivery point, and sets out how the firm transportation charge enters the daily fuel cost, with one of the five pointing to the governing tariff by name.¹²⁹ None of the five permits a reader to compute a cost, because in all five the heat rate content is redacted and the

¹²⁴ Document 224953, searched in full September 15, 2026.

¹²⁵ Document 224953, findings of fact, first numbered finding.

¹²⁶ Turner_Georgia_Statewide_Report_v1_1 § IV.3. Recorded in Turner_GA_Statewide_FactSheet_Correction_2026-09-15.

¹²⁷ Stipulation, paragraph 4; document 224953, third ordering paragraph.

¹²⁸ Document 223493, Table 1.2 narrative at printed p. 2, and document 223492, resource discussion. The five are Mid-Georgia Cogen, Dahlberg Unit 4, Harris Unit 1, Sandersville and Tenaska Heard County.

¹²⁹ Documents 223493 and 223492, the five agreements at their Monthly Fuel Adjustment provisions and transportation definitions. The Tenaska agreement names the governing tariff.

contracted energy amounts are named as withheld, and in the four All-Source contracts, searched in full, no firm transportation quantity appears at all.¹³⁰

Three Company-owned combined cycle projects were certified in the same dockets, on the same day, by the same order.¹³¹ Their pipelines are named in the application.¹³² Searched in full on September 15, 2026, that document gives them no delivery point, no rate construction and no figure.¹³³ The thermal annual cost table is redacted across every column, though its seven columns are capital and fixed cost items and none of them is fuel transportation, so where the firm transport cost sits inside the certified amount is itself not shown.¹³⁴ The Company computed that cost in its bid evaluation, an intervenor obtained it and tabulated it per plant, and the public version of that testimony keeps the row labels and the capacity row and deletes every cost figure.¹³⁵

The certified cost is sealed for both classes. The order certifies the Company-owned resources at Table 1.3.4 and the purchase agreements at Table 4.4, and every cost cell in both is redacted.¹³⁶

The Commission's own Staff computed the same cost, in a finer decomposition, and it is sealed too.

Staff's Table 14 splits the transportation charge into an intrastate component, a lateral component and storage, per unit, and every value cell in the public version is blank, including the column that names the pipeline.¹³⁷ Two sealed computations of the same quantity now sit in this record, made by different parties from different inputs, and neither is public at any level of detail.

One fact about that arrangement is public and it is Staff's: the Precedent Agreement for the Dalton lateral "reflects a build-out equivalent to four CC units," against the two Bowen units the Commission certified.¹³⁸ Staff asked the Company to explain whether it would contract for more firm transportation capacity than the two units need. Nothing retrieved answers that question.

¹³⁰ Ibid., each agreement's heat rate exhibit and the trade secret affidavits naming contracted energy amounts as withheld. The four All-Source contracts were searched in full September 15, 2026 for a firm transportation quantity and return none.

¹³¹ Document 224953, recitals and ordering paragraph 1.

¹³² Document 223493, § 7.4 (Fuel Use) at printed p. 40: Transco for Bowen and Wansley, Southern Natural Gas for McIntosh.

¹³³ Ibid., searched in full September 15, 2026.

¹³⁴ Ibid., Table 7.5.1 (COP Thermal Estimated Annual Costs) at printed p. 41, read from a page image rendered at 200 dpi.

¹³⁵ Document 224479 at p. 34, TS Table 6, public version, and at p. 124, the Georgia Power discovery response placing the firm transportation cost in the bid evaluation's Fixed Fuel category.

¹³⁶ Document 224953, second ordering paragraph; document 223493, Tables 1.3.4 and 4.4, read from page images.

¹³⁷ Document 224506, Table 14.

¹³⁸ Ibid.

What Staff asked for, and what the instruments carry. Staff recommended that construction monitoring reports for the thermal projects include the status of third party firm transportation, and separately that they include pipeline construction status and the status of FERC pipeline approvals.¹³⁹ The Stipulation adopts the monitoring framework Staff asked for and not the reporting Staff asked for inside it. That framework was read at its source in the Yates order and in the testimony the order implements, and in the two Yates monitoring reports as actually filed. The reports carry the status of the Company's own gas lateral and nothing on third party firm transportation, which is the distinction Staff drew.¹⁴⁰ The order reproduces the Stipulation's paragraph substantially verbatim.¹⁴¹ Both documents return zero on "transport," "pipeline," "FERC," "lateral" and "Dalton."¹⁴² Construction monitoring is the only continuing reporting obligation these three units carry to commercial operation, and the gas is not in it.

Georgia law makes the sealed figure the operative one. Section 46-3A-5(b) requires the certificate to describe the approved cost; this certificate describes it by pointing at redacted tables.¹⁴³ Section 46-3A-7(a) makes that approved cost the threshold deciding whether exclusion from rate base requires one of five findings against the utility or instead requires the utility to prove reasonableness and prudence.¹⁴⁴ Section 46-3A-7(c) makes verification of expenditures foreclose exclusion altogether, subject to the same five, and subsection (b) supplies verification by Commission inaction after 180 days.¹⁴⁵

That provision was litigated and the answers do not agree. Four intervenors argued the order is deficient under § 46-3A-5(b) for failing to adopt a load forecast.¹⁴⁶ Staff answered that no provision of § 46-3A-5 modifies the mandatory language of § 46-3A-4(a).¹⁴⁷ Georgia Power's response does not cite § 46-3A-5 at all and rests on a forecast approved in a different docket.¹⁴⁸ The petitioners' reply put the two accounts of the same order side by side and asked the Commission to resolve them.¹⁴⁹ The order denying reconsideration is 582 words, returns zero for "forecast," states no issue, and denies on the

¹³⁹ Ibid., Staff recommendation 13 and the recommendation on pipeline construction.

¹⁴⁰ Stipulation, document 224772, paragraph 5.

¹⁴¹ Document 224953, ordering paragraph on construction monitoring.

¹⁴² Both documents searched in full September 16, 2026 in their Word issuance text. The eight occurrences of "firm" in the order are all "firm capacity, firm energy, and ancillary services" in the purchase agreement descriptions.

¹⁴³ O.C.G.A. § 46-3A-5(b); document 224953, second ordering paragraph.

¹⁴⁴ O.C.G.A. § 46-3A-7(a).

¹⁴⁵ O.C.G.A. § 46-3A-7(c) and (b).

¹⁴⁶ Document 225042, heading at printed pp. 27 to 28.

¹⁴⁷ Document 225155 at p. 5.

¹⁴⁸ Document 225157. Six occurrences of "46-3A-4," zero of "46-3A-5," searched in full September 16, 2026.

¹⁴⁹ Document 225211 at pp. 3 to 4.

ground that the motion for access to the sealed workpapers had been denied first.¹⁵⁰ The written Advisory Staff recommendation it adopts is not filed in either docket.¹⁵¹

One further fact belongs in any account of this certification. The Commission's own Public Interest Advocacy Staff recommended certifying 3,125 MW against a stated capacity deficit of 2,786 MW, recommended rejecting McIntosh Unit 12 outright as twenty-fifth of twenty-six resources, and placed Bowen Units 7-8 and Wansley Units 10-11 in a conditional category contingent on contracts executed by March 16, 2026.¹⁵² None of the three combined cycles this paper is about appeared on Staff's certification list. The Commission certified all of them, and all 9,885 MW.¹⁵³

A member of the public who wanted to know whether Bowen Units 7-8 came in over or under its certified amount could not answer the question from these dockets, because the certified amount is not in them.

The explanation this paper cannot rule out, and does not. Every one of the five purchase agreements is a contract for an existing, operating plant. Every one of the three Company-owned projects is a plant not yet built. A contract for a running facility and a certification filing for a project still being engineered to a final cost are different instruments, and it would be unsurprising for the second to carry more forward-looking commercially sensitive material than the first. That explanation is available on this record and nothing retrieved defeats it. The structural explanation that suggests itself instead, that a purchase agreement is a purchased-power cost while a Company-owned plant enters rate base under § 46-3A-7, is equally unproven. Five instances make a pattern. They do not establish a cause, and this record contains no comparison of the two treatments by anyone.

What else this does not establish.

It does not establish that the redactions were improper. Section 46-3A-4(c) commits the level of cost detail to the Commission's judgment, and the affidavit states a ground that reaches approved cost figures directly.¹⁵⁴ The subject here is what that judgment produced. Rule 515-3-1-.11(7) provides a procedure for challenging a trade secret designation and nothing in the retrieved record shows it was used against these tables.¹⁵⁵

¹⁵⁰ Document 225550, searched in full September 16, 2026.

¹⁵¹ Docket listings for 56298 and 56310 as captured September 16, 2026, 215 entries. No filing between the February 3, 2026 hearing and the February 23, 2026 orders is a recommendation on reconsideration.

¹⁵² Document 224506, Table 3 and Table 12 with the recommendation paragraphs accompanying them.

¹⁵³ Document 224953, ordering paragraph 1.

¹⁵⁴ O.C.G.A. § 46-3A-4(c); document 223493, affidavit at pp. ii-iii.

¹⁵⁵ Ga. Comp. R. & Regs. r. 515-3-1-.11(7). Three renderings across two publishers, all word for word identical: Justia's Georgia regulations captured September 15, 2026; the Georgia Secretary of State's Georgia Administrative Code at the Subject 515-3-1 page, fetched September 16, 2026, which is the publisher the Commission's own site points to; and an Internet Archive capture of that same page from February 26, 2021, which also shows the text unchanged over the intervening five years. Searched across the two docket listings September 16, 2026; the two Trade Secret Access Orders are petitions for access under subsection (3) and concern the large load revenue requirement workpapers, not the cost tables.

It does not establish that Georgia Power never answered the firm transport objection. The written filings this paper searched do not reach it, and **a hearing record exists that this paper has not read.** Georgia Power's post-hearing brief cites this proceeding's transcript at pages 148 through 1399. Three transcript entries sit in these dockets, document 224439 (Direct Hearing Transcript), 227256 (Hearing Transcript 12-10-2025) and 227257 (Hearing Transcript 2-3-2026). Each of the three document detail pages was fetched directly on September 16, 2026 and each returns the filing's metadata and no attached file.¹⁵⁶

The transcripts are not obtainable through the Commission's document system. The Commission archives its sessions on a public video channel, which is a different evidentiary class from a filed transcript and was not used for any finding in this paper.¹⁵⁷ Every negative in this paper is bounded to the written filings it names.

It does not establish that no Georgia authority construes Chapter 3A. A public web search on September 15, 2026 found none, and that search did not reach Westlaw, Lexis, or the Commission's own order archive.¹⁵⁸ It is also incomplete as a statement about this record, because the parties litigated § 46-3A-5(b) here and cited two unreported Superior Court decisions that this paper has not read.¹⁵⁹

It does not establish that the four remedies described in the fact sheet, or the 80 percent share, were never stated anywhere. The five-year window and the four specific actions are absent from the order and the Stipulation, though the order does contemplate remedial action on the same 2026 trigger.¹⁶⁰ Neither the December 10, 2025 hearing nor the December 19, 2025 open meeting has been retrieved.

It does not establish what every one of the 299 redactions in the five purchase agreements withholds. They are now counted and located, and Appendix D publishes that census by contract heading, but a category tells you where a redaction sits and not what is behind it, except where the surrounding text names the item on its face.¹⁶¹ Nor does it establish whether the four All-Source contracts as executed differ from the execution drafts filed, all five documents in the docket being execution drafts or pro forma versions.

¹⁵⁶ Document 224871 for the transcript page range. psc.ga.gov/search/facts-document/?documentId=224439, 227256 and 227257, each fetched September 16, 2026. Each page returns the filing's company, description, filed and received dates and parent dockets, and carries no DownloadFile link. The docket listing's hasAttachment flag records the same for all three.

¹⁵⁷ psc.ga.gov links a public video channel and a livestream page for Commission sessions. The channel's feed was read on September 16, 2026 and confirms it posts administrative sessions and docket hearings as a matter of course. Its search is built in JavaScript and could not be enumerated back to December 2025 from the command line, so whether a recording of any of these three proceedings is posted was not established. No finding in this paper rests on video.

¹⁵⁸ Public web search, September 15, 2026, across the section numbers and paired with Georgia Power, Vogtle, prudence and disallowance.

¹⁵⁹ Document 225042 at printed pp. 27 to 28, citing two unreported Georgia Superior Court decisions.

¹⁶⁰ Stipulation and document 224953, both searched in full September 15, 2026; the order's remedial passage concerns "sufficient time to take remedial actions to protect ratepayers if the expected executed contracts do not materialize in 2026."

¹⁶¹ Appendix D.

It offers no cost comparison for the \$15.66 billion certified estimate, because no comparable figure has been retrieved to this corpus's standard.¹⁶² Staff itself drew one, comparing the Company's combined cycle costs against two other utilities' recent projects and concluding that Georgia Power's "may be relatively high," and that comparison is Staff's rather than this paper's.¹⁶³

Open items carried forward, and there are two. The December 10, 2025 hearing, the December 19, 2025 open meeting, and the February 3, 2026 limited hearing. The transcripts are not obtainable through the Commission's document system, verified at first hand. The Commission's public video channel posts its administrative sessions and hearings and was confirmed active, so recordings of all three are likely to exist there; a recording is a different evidentiary class from a filed transcript, this corpus grades against written primaries, and no finding here rests on video. And the Advisory Staff written recommendation adopted by the order denying reconsideration, which is filed in neither docket and which no route short of an open records request would reach.

Two things that were open are now closed and are stated rather than listed. The Access Orders cite "Rule 515-1-1-.02 and 515-3-2-.11(3)" as the authority for the limited hearing, and there is no Rule 515-3-2-.11. Subject 515-3-2 is titled Residential Electric and Gas Utility Service Disconnections and contains six rules, .01 through .06. That is the reading of two publishers, one of them the Georgia Secretary of State's Georgia Administrative Code, which is the publisher the Commission's own site points to.¹⁶⁴ The test the orders actually apply, weighing economic harm to the utility against the public benefit of disclosure, is the test in Rule 515-3-1-.11(3), Trade Secrets. This paper treats the citation as a slip and not as authority for anything, and it does not affect the orders' reasoning.

The second is the capacity basis of the Supplemental 1,886 megawatts and the unreconciled 3,800 against 3,692 in the thermal figures. Both are resolved in section 2 and both turn out to be the same mixed basis the paper documents for the 7,999.

One item remaining on the list above is listed out of habit and does not belong there. Whether fuel transportation cost is a "construction cost" within § 46-3A-7(a) is not an open retrieval item. It is a question of statutory construction that no Georgia tribunal has answered, that no party raised in these dockets, and that no amount of further retrieval from public sources will settle. It is a limit on what this paper can conclude, stated in section 3 and indexed at Appendix C entry I-4, and it is carried there rather than on a list of things still to be fetched.

Appendix A. Claim-and-source table for section 2

Built 15 September 2026 and revised 16 September, against the deposited archive listed in GA_Gas_Deposit_Manifest.csv, which accompanies this paper. Column 2 states each claim in the form section 2 asserts it, so that it can be checked in place. Grades are the ones used throughout this corpus:

¹⁶² Document 223493, Table 7.25 (COP Thermal Total Certified Cost Summary) at printed p. 55.

¹⁶³ Document 224506, comparing the Company's combined cycle costs against the KU/LGE Brown 12 and Mill Creek 6 projects and Oglethorpe Power's announced Monroe County project.

¹⁶⁴ Subject 515-3-2 as captured 16 September 2026 from rules.sos.ga.gov/GAC/515-3-2 and 15 September 2026 from Justia. psc.ga.gov links rules.sos.state.ga.us/gac/515 as its rules publisher.

[P] primary, [S] corroborated secondary, [S1] single source, [I] author inference, and [P, negative] a bounded absence, which carries the search that established it and the date. The strings behind every string-searched negative are published in Appendix B.

Unless otherwise stated, every document cited is in Georgia Public Service Commission Docket Nos. 56298 and 56310. Each is in the deposited archive with its SHA-256 and its source URL. Application pin cites are to the printed page numbers of the PUBLIC DISCLOSURE version; PDF page and printed page diverge by eleven through the body of that document. Order quotations are taken from the Word issuance file, because the Order's PDF carries no text layer.

A standing caution for this docket. Three substring traps were recorded during retrieval and every hit was read before it was counted. "Pipeline" in Georgia Power and Staff filings almost always means the economic development pipeline of prospective load. "Lateral" matches inside "collateral." "Firm" matches inside "confirm."

#	Claim as section 2 asserts it	Source and pin	Grade	Status
1	Georgia Power filed two applications on 30 July 2025, one document number apart	Docs. 223493 (56298) and 223492 (56310), filing dates on the face of each	[P]	Verified. Both dates read from the documents, not from the docket listing
2	The All-Source application states the second filing was needed because "the All-Source RFP was insufficient to meet all projected capacity needs"	Doc. 223493, sec. 1.3.4 narrative at 4	[P]	Verified verbatim. The sentence is in the All-Source application describing the companion filing, not in the Supplemental application. Corrected at pass 17 sec. 111 after a draft misattributed the speaker
3	The Company sought "a Certificate of Public Convenience and Necessity from the Commission for 7,999 MW of resources, which includes four thermal PPAs ... three thermal Company Owned Projects ('COP') for five combined cycles ('CCs'), nine standalone BESS COPs, and two BESS + Solar COPs"	Doc. 224953, recitals	[P]	Verified verbatim from the Word issuance text
4	The Company also sought "a Certificate of Public Convenience and Necessity from the Commission for a 1,886 MW portfolio of supplemental resources"	Doc. 224953, recitals	[P]	Verified verbatim
5	The order's nine ordering paragraphs grant every resource sought, naming twenty-six of them, and nothing is denied	Doc. 224953, ordering paragraphs 1-9	[P]	Verified. Twenty-six resources counted on the face of ordering paragraph 1. Nine paragraphs counted as one WHEREFORE IT IS ORDERED plus eight ORDERED FURTHER
6	"Georgia Power currently has the Tenaska Heard County CT resource under a PPA through May 31, 2030, as Exelon Heard Units 1-6. The new Tenaska Heard County PPA would secure this existing market resource starting June 1, 2030, for a 20-year term"	Doc. 223492, resource discussion	[P]	Verified verbatim. Established at pass 17 sec. 108 and absent from every earlier pass
7	The MPC amendment extends access to an existing 750 MW contract by 50 MW for 2029	Doc. 223492, same passage	[P]	Verified verbatim
8	Tenaska and the MPC amendment together are 980 of the 1,886 MW	Doc. 223492 itemisation: 646 + 260 + 930 + 50	[I]	Arithmetic on four figures the application states. 930 + 50 = 980
9	The four All-Source PPA facilities are described in the present tense, which the paper reads as indicating existing plants	Doc. 223493, Table 1.2 narrative at 2	[I]	Verified. "The Sandersville facility provides a winter equivalent capacity of 156 MW," and the same construction for Mid-Georgia Cogen, Dahlberg and Harris
10	The order contains zero occurrences of "9,885" and zero of "9,985"	Doc. 224953, searched in full 15 Sept 2026	[P, negative]	Bounded to that document and those two strings
11	7,999 plus 1,886 is 9,885 MW	Doc. 224953, recitals	[I]	Arithmetic on two figures the order states. The order states no combined total
12	The Commission's fact sheet states the agreement "certifies the construction of 9,985 MW of new energy generation"	Georgia PSC, "Data Center Fact Sheet," March 2026, captured 14 Sept 2026	[P]	Verified verbatim from the capture deposited at gapsc_datacenterfactsheet_capture_2026-09-14.pdf
13	The author's own Turner_Georgia_Statewide_Report_v1_1 carries 9,985 on the fact sheet's authority and is wrong on what the order shows	Georgia_Statewide_v1_0_source.md sec. IV.3, notes 56, 57, 61, 62	[P]	Verified in the author's own file. Correction recorded in full in Turner_GA_Statewide_FactSheet_Correction_2026-09-15
14	Table 1.3.3 heads two columns Winter Capacity (MW) and Summer Capacity (MW) and gives Bowen 1,561 / 1,482, Wansley 1,531 / 1,453, McIntosh 797 / 757	Doc. 223493, Table 1.3.3 at 3	[P]	Read from a page image rendered at 200 dpi. Not from text extraction, where column alignment is least reliable
15	Table 1.3.4 lists the same three under a single column headed Nominal Capacity (MW) as 1,482, 1,453 and 757	Doc. 223493, Table 1.3.4 at 4	[P]	Same method. The heading and the figures are both on the face of the table

16	Those are the summer figures under a different heading	Tables 1.3.3 and 1.3.4 compared	[I]	Inference from two tables in the same document giving the same three numbers under two labels. The application nowhere defines either basis
17	Metz labels the same three numbers summer rated capacity	Doc. 224479, TS Table 6, public version	[S]	Read from the witness's own table rather than from the application. Corroborates item 16 from outside it
18	No document in this record states a nominal rating for a combined cycle	Docs. 223493, 223492, 224479, 224953, searched 15 Sept 2026	[P, negative]	Bounded to those four documents. Not a claim about any document outside this record
19	The eleven battery and battery-plus-solar projects sum to 3,112.5 MW and carry one figure each	Doc. 223493, Tables 1.3.1, 1.3.2 and 1.3.4	[I]	Components read from page images; the sum is arithmetic
20	$3,112.5 + 3,692 + 1,195 = 7,999.5$, printed as 7,999; and $3,112.5 + 3,889 + 1,246 = 8,247.5$, printed as 8,248	Doc. 223493, Tables 1.2, 1.3.3, 1.3.4 and the sec. 1.3.4 narrative at 4	[I]	The reconciliation is the author's arithmetic on figures the application states. Both totals reproduce exactly and only on this construction
21	The application states "the 7,999 MW of nominal capacity, equivalent to approximately 8,248 MW of winter capacity"	Doc. 223493, sec. 1.3.4 narrative at 4	[P]	Verified verbatim
22	The certified nominal total is mixed-basis: nominal for the PPAs, summer for the three thermal projects, season-neutral for the eleven storage projects	Items 14 through 21	[I]	Inference from the arithmetic in item 20. No document states that the total is mixed-basis
23	The Competitive Tier was "257 proposals, totaling 9,808 unique MW of winter capacity" and the Short List "21 proposals, totaling 8,248 MW of winter capacity"	Doc. 223493, sec. 3 at 9	[P]	Verified verbatim. Establishes that the RFP was evaluated in winter capacity
24	Section 7.4 states the three projects "would provide a total of more than 3,800 MW of capacity when fueled by natural gas" and approximately 2,460 MW on ULSD	Doc. 223493, sec. 7.4 at 40	[P]	Verified verbatim. The 3,800 reconciles against Table 1.3.3's winter column at item 33; Table 7.25's 3,692 is the summer and nominal figure
25	Table 1.3.4's Total row reads 6,804 / \$15,660,471 / REDACTED / REDACTED	Doc. 223493, Table 1.3.4 at 4	[P]	Read from a page image. Table 1.5, in the unnumbered attachment at PDF p. 112, is identical
26	The fourteen per-project cost cells above that row are redacted in all three cost columns	Same	[P]	Read from the same page image
27	\$15,660,471 thousand is about \$15.66 billion excluding AFUDC and ad valorem	Table 1.3.4 column heading: "Certified Estimate (excluding AFUDC & Ad Valorem) (\$000)"	[P]	Unit conversion is arithmetic; the exclusion is on the face of the heading. Footnote 2 to the table defines "nominal terms" in its cost sense only
28	Vogtle Units 3 and 4 are 2,228 MW, so the certified portfolio is roughly three times that capacity	U.S. EIA, "First new U.S. nuclear reactor since 2016 is now in operation," Aug. 1, 2023; and "Plant Vogtle Unit 4 begins commercial operation," May 1, 2024	[S1]	Corrected, and single-publisher. Both renderings are U.S. EIA "Today in Energy" pieces, so the corpus standard of two publishers is not met. An earlier draft stated 2,460 MW, which is not a Vogtle figure at all: it is the All-Source Application's sec. 7.4 statement of the three proposed combined cycles' capacity on ultra-low sulfur diesel. The author conflated the two. Two independent EIA articles each give 1,114 MW per unit; the pair figure is arithmetic on those. Captured and deposited in the archive under rules/. No cost comparison is offered anywhere in the paper
29	The application's summary sentence attaches \$15,660.5 million to a 7,999 MW portfolio while citing Table 1.3.4, which sums to 6,804 MW	Doc. 223493, sec. 1.3.4 narrative at 4, against Table 1.3.4	[P]	Both readings verified. The mismatch is on the face of the document
30	Table 4.4 prices the four PPAs in dollars per kW-year and every cell is redacted	Doc. 223493, Table 4.4 at 11	[P]	Verified cell by cell from a page image; all four columns across all annual periods read REDACTED
31	The three thermal projects are 3,692 MW, or 54 percent, of the 6,804 MW behind the single public cost figure	Tables 7.25 and 1.3.4	[I]	$3,692 / 6,804 = 54.26$ percent. Arithmetic on two figures the application states
32	The three subtotals as printed, $2,763 + 350 + 3,692$, sum to	Doc. 223493, Tables 5.25, 6.25,	[I]	A one-megawatt rounding artifact. Hammond Phase II is 192.5 MW; the

	6,805 against a grand total of 6,804	7.25 and 1.3.4		BESS subtotal rounds 2,762.5 up and the grand total truncates 6,804.5 down
33	Table 1.3.3's winter column for the three combined cycles sums to 3,889, so section 7.4's "more than 3,800" is true on the winter basis and false on the summer basis	Doc. 223493, Table 1.3.3 at 3, read from a page image	[I]	Arithmetic on three figures the table states: 1,561 + 1,531 + 797. The application labels neither section 7.4 nor Table 7.25 with a basis
34	The Supplemental 1,886 MW is four components: 646 MW NEER BESS PPAs, 260 MW Wadley BESS, 930 MW Tenaska, 50 MW MPC amendment	Doc. 223492, itemisation	[P]	Verified verbatim. The four sum to 1,886
35	The application states the Tenaska PPA as 930 MW summer while its own footnote says a 945 MW winter rating "is reflected in the evaluations of this resource"	Doc. 223492, footnote 2 to the itemisation	[P]	Verified verbatim. At 945 the four components sum to 1,901. The headline total and the evaluation behind it use different bases for the same resource

Items carried at less than [P], collected

Eleven claims in section 2 are not primary and each is marked in the text:

- **Item 16**, that Table 1.3.4's "Nominal Capacity" column carries summer figures for the three thermal projects. Inference from two tables, corroborated at [S] by item 17.
- **Items 8, 11, 19, 20, 22, 31 and 32**, all arithmetic on figures the documents state. Marked [I] because the documents do not perform the arithmetic. Item 32 concerns a figure section 5.2 also uses. Items 33 through 35 were added on 16 September 2026 when section 2 resolved two figures it had previously carried as unexplained.
- **Item 9**, that the four All-Source PPA facilities are existing plants, is an inference from the application's present-tense description. Only Tenaska is documented as existing in terms.
- **Item 17**, Metz's label, at [S] because it is read from a witness's table rather than from the application.
- **Item 28**, the Vogtle capacity comparison, at [S1]. Both renderings are U.S. EIA "Today in Energy" pieces, so the corpus standard of two publishers is not met, and the 2,228 MW pair figure is arithmetic neither article performs. The figure it replaces was wrong rather than merely uncorroborated, and the claim table is what caught it.

Negatives in section 2 and their bounds

- **Item 10**. Zero occurrences of "9,885" and "9,985". Bounded to document 224953, searched in full on 15 September 2026.
- **Item 18**. No nominal rating for a combined cycle. Bounded to documents 223493, 223492, 224479 and 224953.

Both negatives are restated in the body with their bounds attached. The abstract states the total as the sum of two components rather than as an absence, and section 8 repeats each bound in full.

Appendix B. Search terms behind every string-searched negative in this paper

Every negative finding in this paper rests on an exhaustive search of a named document for named strings on a named date. This appendix publishes the strings, so that any reader can re-run the search and get the same answer, or a different one.

That is not a formality. On 16 September 2026 an audit of this paper found that two searches stated side by side had been run on different stems: the Stipulation on "remedi" and the Order on "Remediat." The first is the right stem and the second is not. "Remediat" returns zero against the Order and "remedi" returns one, and the one hit is directly on point. The paper carried a false negative for five days on the strength of four letters. **A negative whose string is not published cannot be checked, and this corpus now treats an unpublished string as an unstated bound.**

Matching is case-insensitive substring matching unless noted. Where a document is a Word issuance file, the search was run against the extracted body text of word/document.xml, not against a PDF text layer.

1. The Order, document 224953, on fuel and pipeline

Searched in full on 15 September 2026 against the Word issuance file, and re-run on 16 September against an extraction that also includes footnotes.xml and endnotes.xml, 34,097 characters. All nineteen return zero on both.

firm transportation · firm gas · gas supply · fuel supply · gas transportation · transportation contract · pipeline · capacity factor · heat rate · fuel cost · Transco · Southern Natural · Elba · precedent agreement · dekatherm · Dth · interruptible · fuel transportation · delivered fuel

Note on “pipeline.” Zero here is a real zero for this document. In other documents in these dockets the string almost always means the economic development pipeline of prospective load rather than a gas pipeline, and every hit in this corpus was read before it was counted.

2. The Order, on the combined total

Searched in full on 15 September 2026. Both return zero.

9,885 · 9,985

3. The Order, on percentages

Searched in full on 15 September 2026. Both return zero.

percent · %

4. The Order, on the backstop

Searched in full on 15 and 16 September 2026. backstop returns **two** hits, both inside the single passage summarising Staff witness Trokey’s testimony, which section 7 quotes. An earlier version of the retrieval record reported one.

5. The Order and the Stipulation, on the fact sheet’s remedies

Searched in full on 15 September 2026, and re-run on 16 September after the audit.

Stipulation, all nine return zero: backstop · five · remedi · suspend · surplus · sell · retire · early · 80

Order: suspend, surplus and out-of-state return zero. remedi returns **one**, in the findings of fact, and it is quoted in section 7. five returns three, retire one, early one and sell one, each bounded and unrelated as section 7 describes.

The stem matters. Remediat returns zero against the Order. remedi does not.

6. Georgia Power’s rebuttal testimony, document 224672, both panels

Searched in full on 15 September 2026. All fourteen return zero in both the Main Panel and the COP Projects Panel.

firm gas · firm transport · firm transportation · gas transport · gas supply · fixed fuel · fuel cost · storage cost · capacity factor · heat rate · transportation contract · Transco · Southern Natural · dekatherm

Re-run on 16 September against a fuller extraction that joins split runs and includes footnotes.xml. All fourteen still return zero.

7. Georgia Power's post-hearing brief, document 224871

Searched in full on 15 September 2026, and re-run on 16 September against the fuller extraction. All four return zero.

fixed fuel · McIntosh · Bowen · Wansley

8. The four Appendix A power purchase agreements, on gas quantity

Searched in full on 15 and 16 September 2026 across all four contracts. All return zero **as quantities**.

Firm Transportation Quantity · MDQ · Maximum Daily · Dth (as a unit of measure)

A correction to this list. The string firm transportation capacity does appear in all four, in the definition of the interruptible transportation term, which this paper quotes. An earlier version of the retrieval record reported it at zero because the layout extraction wrapped the phrase across a line break. The paper's claim concerns a quantity rather than the phrase, and is unaffected.

dekatherm returns one hit in each contract, in the definition "One MMBtu is equivalent to one dekatherm."

9. The two Trade Secret Access Orders, documents 225549 and 225589

Searched in full on 15 September 2026. All return zero in both orders.

combined cycle · thermal · Table 7.25 · Table 1.3.4 · firm transportation · pipeline

10. A negative withdrawn

An earlier draft of this research recorded that nothing in Staff's testimony raised the cost of firm gas transportation, the delivering pipeline, or the capacity factor of the certified thermal units, bounded to four files. The bound was accurate and the scope was wrong. Staff filed two panels in these dockets: the load forecast panel at document 224483, four files, and the resource panel at document 224506. The four files searched were the first panel. Document 224506 raises all three subjects. The negative does not appear in this paper and is recorded here because the convention that saved it, which is bounding every negative to named documents, is the same convention that made the error visible.

11. Negatives established by reading rather than by string search

Three findings in this paper rest on reading a document in full rather than on searching it for strings, and no string list can be published for them. They are marked here so that a reader does not mistake a reading for a search.

The Application on delivery point, rate construction and figure for the three combined cycles.

Established by reading section 7.4 and sections 7.5 through 7.25 of document 223493 in full on 15 September 2026. Section 7.4 names the pipelines and the service type; no later section supplies a delivery point, a rate construction or a figure.

Whether the affidavits satisfy Rule 515-3-1-.11(1)(c). No retrieved document addresses it. The retrieval covered both dockets' listings and the two Trade Secret Access Orders; no Commission ruling on the sufficiency of either affidavit was located.

Which specific redactions the Commission accepted on which ground. Same bound. The Commission accepted the filings; no document retrieved states a ground for a particular redaction.

12. The nominal rating of a combined cycle

Searched in full on 15 September 2026 across documents 223493, 223492, 224479 and 224953. No document states a nominal rating for a combined cycle. Tables 1.3.4, 1.5 and 7.25 head a column "Nominal Capacity (MW)" and give figures that Table 1.3.3 of the same document labels summer, which is the reading section 2.4 sets out and which the claim table grades as inference.

13. Authority construing O.C.G.A. Chapter 3A

Searched 15 September 2026 by public web search on the section numbers, and on the section numbers paired with Georgia Power, Vogtle, prudence and disallowance. No reported Georgia appellate decision construing §§ 46-3A-4 through 46-3A-7 was located.

This search did not reach Westlaw, Lexis, or the Commission's own order archive. It establishes that no authority is reachable by the routes a member of the public would use. It does not establish that none exists.

14. The Order Denying Reconsideration, document 225550

Searched in full on 16 September 2026 against the Word issuance file. All four return zero.

redact • cost • Table • confidential

A second pass the same day, against the statutory and numerical subjects the petition raised. All four return zero.

forecast • 46-3A-5 • 46-3A-4 • 757

The document is 582 words in its Word issuance file, including the caption and the signature block.

15. The Order and the Stipulation, on firm transportation reporting

Staff's thirteenth recommendation in document 224506 asked that construction monitoring reports carry the status of third party firm transportation, and a second Staff recommendation asked for pipeline construction status and FERC approval status. Neither instrument carries either. Both documents were searched in full on 16 September 2026, the Stipulation at 837 words and the Order at 5,229 words in its Word issuance file. All five return zero in both.

transport • pipeline • FERC • lateral • Dalton

firm was searched as a sixth stem and is not a zero. It returns eight hits in the Order, every one of them inside "firm capacity, firm energy, and ancillary services" in a purchase agreement description, and none in the Stipulation. This is the substring trap recorded at the head of Appendix A, and it is published here as a hit rather than suppressed as a negative.

16. The Plant Yates Units 8-10 monitoring framework, Docket 55378

Stipulation paragraph 5 incorporates the Yates process and procedures by reference, so the negative at section 13a is only as good as what that framework contains. Both source documents were retrieved and searched in full on 16 September 2026.

Order Granting Certification of Plant Yates Units 8-10, document 219790, 3,334 words in its Word issuance file. All six return zero.

firm transport • transport • pipeline • FERC • lateral • gas supply

Direct testimony of Steven D. Roetger, document 219136, 4,556 words, the testimony the order implements. Searched on the same six plus FT and natural gas. pipeline returns one and lateral returns one, and both are the same sentence in a quoted hearing exchange: “an estimate to, if you will, build a small gas lateral from the location to a larger pipeline.” Everything else returns zero.

The one hit is published here rather than suppressed, and it is about a Company-built lateral inside the Yates construction estimate, not about third-party firm transportation.

17. The Yates monitoring reports as actually filed, Docket 55931

The written framework is one thing and the reports it produces are another, so both were checked. Two reports have been filed, document 223704 of 15 August 2025 and document 225433 of 16 February 2026, each about 2,200 words. **They are filed in Docket 55931, not in the certification docket 55378.** Both searched in full on 16 September 2026. All five return zero in both.

firm transport • FT • transport • FERC • gas supply

lateral returns five in each and is published here as a hit. Every occurrence is the Company’s own gas lateral, which each report tracks under a subheading of that name in the Owner’s Scope section.

18. Subject 515-3-2 of the Commission’s rules

The two Trade Secret Access Orders cite “Rule 515-1-1-.02 and 515-3-2-.11(3).” Subject 515-3-2 was captured from Justia on 15 September 2026 and from the Georgia Secretary of State’s Georgia Administrative Code, the publisher the Commission’s own site points to, on 16 September 2026. The Secretary of State’s subject-level page serves the full text of every rule in the subject statically, where the rule-level page is built in JavaScript and returns none.

Both publishers give the subject as RESIDENTIAL ELECTRIC AND GAS UTILITY SERVICE DISCONNECTIONS with six rules, .01 through .06. 515-3-2-.11 returns zero in both captures.

19. Georgia Power’s response to the reconsideration petition, document 225157

Searched in full on 16 September 2026 against the Word issuance file, 5,331 words.

46-3A-5 returns zero. 46-3A-4 returns six.

The negative is the point: the petition’s statutory ground was § 46-3A-5(b), Staff answered on it, and the Company’s response does not contain the section number.

20. The Independent Evaluator and the Southern Renewable Energy Association witness

Both were retrieved and read on 16 September 2026 after a term census. Accion Group's Independent Evaluator testimony, document 224482, 16,461 words: firm transport zero, fixed fuel one, fuel cost one, capacity factor zero. Makhyoun for the Southern Renewable Energy Association, document 224477, 11,298 words: firm transport zero, fixed fuel zero, fuel cost one, capacity factor one.

Neither filing quantifies firm transportation. Within the documents searched for this paper, Metz at 224479 is the only intervenor filing that does and Newsome at 224506 is the only Staff filing that does.

21. The Advisory Staff written recommendation adopted by the denial order

Document 225550 denies reconsideration by adopting a written recommendation of Commissioner Advisory Staff. Searched across all 215 entries in the two docket listings as they stood on 16 September 2026: nothing filed in either docket between the 3 February 2026 hearing and the 23 February 2026 orders is a recommendation on reconsideration. The filings in that window are document 225529, a Georgia Power data request response, and the three orders themselves at 225549, 225550 and 225589. The bound is the docket listing, which does not establish that no such document exists, only that none is filed in these two dockets.

22. A motion challenging the trade secret designation of the cost tables

Searched across the docket listings for 56298 and 56310 as they stood on 14 September 2026, at 109 and 106 documents. No motion under Rule 515-3-1-.11(7) challenging the designation of the cost tables was located. The two Trade Secret Access Orders are petitions for access under subsection (3) and concern the large load revenue requirement workpapers.

23. The docket listings

The Georgia PSC FACTS docket page builds its document table in JavaScript, so a fetch of the page itself returns the frame and no rows. The table is populated from `psc.ga.gov/search/service-facts-docket/?docketId=N&sortDirection=ASC&sortColumn=DocumentId&searchText=&pageSize=500`, which returns JSON. Fetched 16 September 2026, it gives resultsCount 109 for Docket 56298 and 106 for Docket 56310. Both responses are deposited, together with a 215-row CSV carrying document ID, filed date, filer, description, whether a file is attached, and the landing URL for each.

Four entries across the two dockets carry `hasAttachment: false`: documents 224439 (Direct Hearing Transcript), 227256 (Hearing Transcript 12-10-2025), 227257 (Hearing Transcript 2-3-2026) and 224283 (a Staff data request). Every other entry has a file.

How to re-run these

Order and access orders are Word issuance files; extract `word/document.xml` and strip tags rather than reading the PDF, which carries no text layer in these dockets. The Application and the power purchase agreements have text layers, but **table columns do not extract reliably**, and every table figure cited in this paper was read from a page image rendered at 200 dpi instead. Document numbers resolve at `psc.ga.gov/search/facts-document/?documentId=N`, and files download from `services.psc.ga.gov/api/v1/External/Public/Get/Document/DownloadFile/{documentId}/{fileId}`, where the

filed is read off the landing page. Every document cited here is also in the archive deposited with this paper, listed in GA_Gas_Deposit_Manifest.csv.

Appendix C. Inference index for sections 3 through 8

Built 16 September 2026. Appendix A grades every claim in section 2, where the paper's factual foundation sits. Sections 3 through 8 are argument, and grading them claim by claim would produce a table almost entirely of [P] rows restating section 2. This index does the thing that is actually useful instead: it isolates every step in sections 3 through 8 where the paper goes beyond what a retrieved document says, states it in the form the paper asserts it, and says what would defeat it.

Each entry carries four fields. **The inference** as the paper states it. **Where** it sits. **What it rests on**, which is always primary and always pinned. **What would defeat it**, which is the field that matters, because an inference nobody can falsify is not an inference.

Twelve entries. Every other proposition in sections 3 through 8 is either a quotation, a bounded negative published in Appendix B, or arithmetic on figures stated on the face of a retrieved document.

I-1. The certificate discharges § 46-3A-5(b) by reference to sealed tables

Where. Section 3, "the narrow claim."

Rests on. O.C.G.A. § 46-3A-5(b), three renderings across two publishers. Document 224953, second ordering paragraph, certifying at Table 1.3.4 and Table 4.4. Document 223493, both tables, read from page images at 200 dpi, every cost cell redacted.

What would defeat it. A rendering of the certificate that states an approved cost figure anywhere on its face. Or any Georgia authority holding that a certificate satisfies the subsection only by stating the figure, or holding the opposite. The paper says no such authority was located and states the bound of that search.

Note. The paper says in terms that § 46-3A-5(b) "does not say publicly." The inference is about what the instruments did, not about whether it was lawful.

I-2. § 46-3A-7(a) makes the approved cost the threshold that decides which burden applies

Where. Section 3, and restated in section 8.

Rests on. The text of § 46-3A-7(a), which is the one Chapter 3A section in this paper meeting the corpus standard of three renderings across two publishers with a history line.

What would defeat it. A construction of the section by any Georgia tribunal reading the 100 percent figure against something other than the certificated amount. Also, a showing that the certificated amount and the "costs approved by the commission under Code Section 46-3A-5" are different quantities in practice, which this record does not address.

I-3. What the certificate wrote down is load-bearing in a way Virginia's final order was not

Where. Section 3, carried from the third retrieval pass, and implicit in the paper's framing against the companion Virginia paper.

Rests on. § 46-3A-7(a) as captured, against Va. Code § 56-249.6 D 2 as captured in the companion paper.

What would defeat it. Georgia authority treating the certificate as non-preclusive in the way the Virginia scheme's after-the-fact fuel review is. This is comparative reading of two statutes by the author and no tribunal has compared them.

I-4. Whether fuel transportation cost is a "construction cost" within § 46-3A-7(a) is unresolved

Where. Section 3 and section 8's open items.

Rests on. Nothing. This is named as an open question, not asserted.

What would defeat it. It is already stated as open. It is in this index because the strength of I-2 depends on the answer, and a reader should be able to see that dependency in one place.

I-5. The firm transportation cost cannot be obtained by subtraction

Where. Section 5, "the consequence is arithmetic."

Rests on. Document 223493, Tables 1.3.4, 1.5, 4.4, 5.25, 6.25 and 7.25, read from page images. Each is sealed at its total line as well as at its component lines.

What would defeat it. Any public total in these dockets from which a sealed subtotal could be recovered by difference. The paper's claim is that all three routes are closed within the public filings of these two dockets, and it does not extend to the hearing record or to filings in other dockets.

I-6. Table 7.5.1's seven columns contain no fuel transportation column

Where. Section 5 and section 8.

Rests on. The column headings of Table 7.5.1, which survive the redaction and were read from a 200 dpi page image.

What would defeat it. A reading of the headings different from the one this paper made. This is the inference that produced the paper's worst published error before correction, which asserted the delivery price was inside that table. The correction is recorded in the retrieval log at pass 20.

I-7. Staff's Table 14 decomposes the transportation charge more finely than Metz's TS Table 6

Where. Section 4.

Rests on. The column headings of both tables, both surviving in the public versions. Staff at document 224506 Table 14: Fixed Intrastate FT Cost, Fixed Lateral FT Cost, Fixed Storage Cost. Metz at document 224479 p. 34: Fixed fuel costs, Firm transport cost, Storage cost.

What would defeat it. A showing that Staff's two transportation columns are not a split of the same quantity Metz's single column carries. The two tables were built from different inputs by different parties and the paper does not claim they would produce the same total.

I-8. The seal in this docket is not applied to a consistent set of facts

Where. Section 4.

Rests on. Document 223493 § 7.4, which names Transco and Southern Natural Gas in public text, against Staff's Table 14 Transport Pipeline column, which is blank for the same three facilities.

What would defeat it. A showing that the two filings were designated under different standards or by different filers with different obligations. Both were filed in these dockets. The paper does not claim either designation was improper, and § 46-3A-4(c) commits the level of detail to the Commission.

I-9. The Stipulation dropped the firm transportation reporting Staff asked for

Where. Section 6, and restated in section 8.

Rests on. Document 224506, Staff recommendation 13 and the pipeline construction recommendation. Document 224772, Stipulation paragraph 5. Document 224953, the construction monitoring ordering paragraph. And the bounded negative at Appendix B section 15: five stems, zero hits, both documents.

The incorporated framework was read, which closes what was the weakness in this entry. Paragraph 5 incorporates the Plant Yates Units 8-10 process and procedures by reference. Those are set out in the Commission's order of August 29, 2024 in Docket No. 55378, document 219790, which approves the program "in accordance with the filed testimony of Staff Witness Roetger" and enumerates it: six elements and roughly forty document and report types, all of them engineering, procurement, construction and cost control. Searched in full, that order returns zero for "firm transport," "transport," "pipeline," "FERC," "lateral" and "gas supply." Roetger's testimony at document 219136 returns one "pipeline" and one "lateral," both in a single quoted hearing exchange about the Company-built lateral inside the Yates construction estimate. **Neither carries a gas transportation reporting element.** An earlier version of this entry said the Yates procedures had not been read and named that as the live weakness; both documents were retrieved and searched on 16 September 2026 and are deposited.

The framework in practice was checked too. Two Yates construction monitoring reports have been filed, the second in August 2025 and the third in February 2026, in Docket No. 55931 rather than in the certification docket. Both were retrieved and searched on 16 September 2026. Each carries a subsection headed Gas Lateral under the Owner's Scope, reporting the designer, the pipeline contractor, the construction start and, in the third, mechanical completion in December 2025 "to support fuel gas availability in March 2026." Neither returns a single occurrence of "firm transport," "FT," "transport," "FERC" or "gas supply."

The practice matches the written terms and sharpens them. The framework reports the gas infrastructure the Company builds and nothing about the gas transportation the Company contracts for from an interstate pipeline. That is the line Staff's recommendation 13 drew when it asked for monitoring consistent with Yates plus the status of *third party* firm transportation.

What would defeat it. Any instrument in these dockets that imposes third party firm transportation status reporting. Or a Yates monitoring report after the third that begins carrying it, which would show the framework changing. Two reports and two source documents now point the same way, so this entry carries no named weakness; a reader who wants to test it should read the fourth report when it is filed.

I-10. The \$8.50 commitment is a revenue floor and not a cost backstop

Where. Section 7, “the distinction is not semantic.”

Rests on. Stipulation paragraph 4 in full; paragraphs 3 and 6; document 224953 summarising Staff witness Trokey as “backstop projected revenues”; the Chairman’s motion in the Trade Secret Access Orders referring to “the revenue floor and the \$8.50.” Three Commission sources, all calling it revenue.

What would defeat it. A Commission instrument obliging the Company to absorb certified capital cost. The petitioners’ reply records that Georgia Power and Staff themselves describe the paragraph differently from each other, which the paper reports and does not resolve.

I-11. The five-instance disclosure pattern does not establish a cause

Where. Section 8, “the explanation this paper cannot rule out.”

Rests on. Five purchase agreements, all for operating plants, all naming pipeline and zones. Three Company-owned projects, none built, pipeline named and nothing further.

What would defeat it. Nothing in this record, which is the point of the entry. Two explanations are available, the operating-versus-unbuilt one and the rate-base-versus-purchased-power one, and the paper states both and adopts neither. A reader who finds the paper choosing between them is reading something the text does not say.

I-12. The fact sheet’s remedies are absent from the instruments, but the order does contemplate remedial action

Where. Section 7, “the remedies window.”

Rests on. The Stipulation and the order searched against nine and then eleven stems, published at Appendix B section 5, and the order’s first numbered finding of fact, which uses the phrase “remedial actions” on the same 2026 contract trigger the fact sheet names.

What would defeat it. The December 10, 2025 hearing, the December 19, 2025 open meeting, or the February 3, 2026 limited hearing, none of which has been retrieved. The five-year window and the four specific actions could have been stated in any of them.

Note. The stem error that hid the order’s remedial passage, searching the Stipulation on “remedi” and the order on “Remediat” and treating the pair as one search, is recorded at retrieval pass 20. It is the reason this entry names its stems.

What this index does not cover

Section 2 is graded claim by claim in Appendix A. Every bounded negative in the paper, in any section, is published with its search strings and date in Appendix B. Quotations are verified against the Word issuance text for orders and against 200 dpi page images for tables, and the method is stated at the head of Appendix A.

Arithmetic is not indexed here. Three sums appear in the paper: 7,999 plus 1,886 is 9,885; 646 plus 260 plus 930 plus 50 is 1,886; and 1,114 times two is 2,228. Each is stated in Appendix A with the figures it operates on and the document that states them.

Appendix D. Redaction census of the five gas purchase agreements

Built 16 September 2026. An earlier draft of this paper said the redactions in the five agreements “were counted, not categorized.” They are categorized here.

Method. Each public-disclosure PDF was extracted with pdftotext -layout. Every occurrence of the token REDACTED was captured with its line context and with the nearest preceding contract heading, where a heading is an ARTICLE line, an EXHIBIT, APPENDIX or SCHEDULE line, or a numbered section of the form 11.2.1 Title. Categories below are the headings themselves, not the author’s groupings, and the per-document totals reconcile to the raw token counts exactly.

The census covers the count and the location of each redaction. **It does not establish what any redaction withholds**, except where the surrounding text names the withheld item on its face, which it frequently does.

The census

Category	269-06 CC	269-07 CT	303-01 CT	311-01 CC	Tenaska CT	Total
A. Capacity price, § 1.5	20	12	32	25	20	109
B. Energy payment calculation, Exhibit C	13	10	10	26	10	69
C. Technical limits and scheduling, Exhibit D	12	9	9	12	12	54
D. Facility description, Exhibit A	3	6	5	7	8	29
E. Performance testing, Exhibit E	3	3	3	5	3	17
F. Guaranteed heat rates, Exhibit F	9	1	2	2	1	15
G. Scheduling notice periods, § 12.2	1	1	1	1	1	5
H. Gas supply plan costs, § 11.2.1	1	0	0	0	0	1
Total	62	42	62	78	55	299

Document totals are the token counts for the whole file: 62, 42, 62, 78 and 55, summing to 299.

What each category withholds, where the text says so

A. Capacity price, 109 of 299 and the largest category by a wide margin. The surrounding text names the item in nearly every instance: “first Annual Period will be \$REDACTED/kW-year and will increase per Table B-2 (Annual Capacity Price),” “Base Mode Value Factor = REDACTED,” “Tier 1 Supplemental Mode

Value Factor = REDACTED.” This is the same quantity the order seals at Table 4.4, which certifies the purchase agreements at PPA Annual Capacity Pricing in dollars per kilowatt-year. **The price is therefore sealed twice, once in the contract and once in the certificate, and this paper found no public route to it in either.**

B. Energy payment, 69. Dollar-per-megawatt-hour rates in 2026 dollars with an annual escalator, and a startup matrix carrying startup fuel and operations and maintenance rates at hot, warm and cold states. Every cell in that matrix is removed.

C. Technical limits, 54. Minimum output in megawatts, stated per operating configuration: “a minimum output level of approximately REDACTED MW with one CT operating and REDACTED MW with two CTs operating.”

D. Facility description, 29, and this is the category that reaches past commercial terms. It includes the air permit identifier (“Other Air Permit REDACTED”), fuel oil storage capacity in gallons, the upper limit on fuel oil, maximum hourly fuel oil consumption, the fuel oil purchase price per gallon, and, in the Tenaska agreement, **the greenhouse gas emission rate:** “GHG Rate Either: (i) regarding CO₂, REDACTED lbs. of CO₂ / MMBtu if operating on Natural Gas and REDACTED lbs. of CO₂ / MMBtu if operating on Fuel Oil.” The Tenaska agreement also withholds the number of combustion turbine units at the facility in one recital, “the REDACTED CT Units, specifically identified in the Air [Permit],” while stating the unit count elsewhere in public text.

A carbon dioxide rate in pounds per million British thermal units and a fuel oil tank volume in gallons are physical facts about a permitted facility, not prices. The paper makes no claim that their designation was improper, and O.C.G.A. § 46-3A-4(c) commits the level of detail to the Commission. **The observation is only that the seal in these agreements is not confined to commercial terms.**

F. Guaranteed heat rates, 15, and every one of the five is affected. The form differs. 269-06 removes nine items including the interpolation rule and the average heat rate formula’s right-hand side; 269-07 removes the right-hand side of “Guaranteed Heat Rate (in MMBtu/MWh) = REDACTED”; 303-01 and 311-01 remove lettered subparagraphs A and B whole; Tenaska removes the exhibit’s content entirely. This is what closes the arithmetic: the daily fuel cost formula in these contracts is public and prices delivery by reference to a published tariff, but the heat rate that converts it into a cost per megawatt-hour is not.

H. Gas supply plan costs, one redaction, in one agreement, and it is worth naming. Section 11.2.1 is word for word identical across all five and reads in four of them: “Except as provided in this Part 11 (Fuel Supply Allowances), GPC will bear all costs incurred under the Gas Supply Plan.” **In 269-06 alone, a sentence stands at the head of that provision and is redacted:** “11.2.1. Gas Supply Plan Costs. REDACTED. Except as provided in this Part 11 . . .”

One of the five agreements carries an additional term about who bears gas supply plan costs, and the other four do not. What that term says is not public. This is the only redaction in any of the five that sits inside the fuel cost allocation itself.

What the census changes, and what it does not

It closes a defensible but unfinished statement. “Counted, not categorized” was accurate and was carried through eight retrieval passes as an open item when the work needed no new retrieval and no new access. The documents were already deposited.

It does not establish impropriety. Every redaction here is covered by the trade secret affidavits the filers submitted under Ga. Comp. R. & Regs. r. 515-3-1-.11, and the rule's subsection (7) procedure for challenging a designation was available and, so far as the docket listings show, unused.

It does not reach the execution drafts. All five documents in the docket are execution drafts or pro forma versions. Whether the contracts as executed differ from them is not established by anything retrieved.

The four All-Source agreements are filed under bid numbers and this census uses those numbers, but each names its counterparty on its cover page in public text: Southern Power Company for 269-06 and 269-07, AL Sandersville, LLC for 303-01, and Mid-Georgia Cogen L.P. for 311-01. Read against the order's ordering paragraph, 269-06 and 269-07 are the Dahlberg Unit 4 and Harris Unit 1 agreements with Southern Power, and the two remaining map to the Sandersville and Mid-Georgia Cogen resources the order certifies by name. Which Southern Power agreement is which is an inference from the unit configurations, CC against CT, and not from anything either document states.

About the author

Tommy N. Turner is an independent researcher and writer who documents the local-government and energy dimensions of the data center build-out. His series of jurisdiction-level case studies covers the counties and corridors where these decisions have been made, refused, or contested, and the analytical volumes extend that work into the systems those decisions run on: the transmission network and the cost-allocation machinery in the first volume, generation in the second, and a federal corporation's siting practice in the third. He works through Turner Advisory Group, LLC, holds an MBA from the Goizueta Business School at Emory University and a teaching certificate from Harvard's Derek Bok Center, and writes opinion and analysis for outlets including the Richmond Times-Dispatch, the Virginia Mercury, the Virginian-Pilot, the Roanoke Times, Cardinal News, and RTO Insider.

Like the rest of the series, this paper is assembled from primary records. The corpus behind it is 117 files deposited with the paper and listed in `GA_Gas_Deposit_Manifest.csv` with a byte count, a SHA-256 and a source URL for each: both certification applications and their appendices, including all five gas purchase agreements in their public disclosure versions; the Order Adopting Stipulation and the Stipulation itself; both Trade Secret Access Orders and the order denying reconsideration; Commission Staff's two testimony panels; the intervenor testimony of Lucy Metz, of Accion Group as Independent Evaluator, and of Makhyouun for the Southern Renewable Energy Association; Georgia Power's rebuttal and post-hearing brief; the full reconsideration exchange, being the joint petition, both responses and the reply; the Plant Yates certification order, the Staff testimony it implements and the two Yates construction monitoring reports from Dockets 55378 and 55931; five sections of O.C.G.A. Title 46 Chapter 3A and two Commission rules, each captured from the publishers named in the notes; and the complete 215-row enumeration of both docket listings.

Since July 2026 he has served on the advisory board of Data Centers and the Southern Energy Buildout: Implications for Electricity Costs, Energy Transition, and Energy Justice, a three-year study at Emory University funded by the Alfred P. Sloan Foundation, for which he receives a token honorarium. The study had no role in this article. The research, the retrieval, the errors and the conclusions are his own.

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