



Department of Energy

Washington, DC 20585

May 13, 2026

Christopher Nunn
State Historic Preservation Officer and Commissioner
Georgia Department of Community Affairs
Attn: Environmental Review, Historic Preservation Division
60 Executive Park South, NE
Atlanta, Georgia 30329

cc:

Jennifer Flood, Division Director
Deputy State Historic Preservation Officer

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Georgia Power Company, Twiggs Battery Energy Storage System Project, Twiggs County, Georgia

Dear Mr. Nunn,

Pursuant to its authority under Title XVII of the Energy Policy Act of 2005, as amended, which established a Federal loan guarantee program, the U.S. Department of Energy (DOE) Office of Energy Dominance Financing (EDF) is evaluating whether to provide a Federal loan guarantee to Georgia Power Company (GPC, or the Applicant) for the Twiggs Battery Energy Storage System (BESS) Project (the Project) located in Twiggs County, Georgia.

The purpose of this letter is to formally initiate consultation with the Georgia State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents a description of the undertaking, the Area of Potential Effects (APE), the efforts to identify historic properties, and seeks your concurrence with DOE's Finding of No Historic Properties Affected for this Project.

A cultural resources report is included as Attachment 1, and a Georgia Historic Preservation Division (HPD) Environmental Review Form is included as Attachment 2.

Description of the Undertaking

DOE's action is the issuance of a proposed Federal loan guarantee to the Applicant for the undertaking (i.e., the Project), which includes the construction and operation of a 200-Megawatt (MW)/4-hour duration electrochemical BESS coupled with a new approximately 0.5-mile-long underground 34.5 kilovolt (kV) utility line and electrical

substation. The BESS will be constructed on existing foundations located on approximately 17 acres of previously disturbed land adjacent to an existing electric generating facility. The underground line will connect the BESS to the proposed substation, which will tie into the existing generating facility's step-up substation. The Project will include the construction and installation of shop-fabricated battery enclosures, inverter step-up transformers, auxiliary power system, site building, power plant control system, water tank, security system, and external fire alarm system.

The proposed Project is located at 9114 Georgia Highway 129 in Dry Branch, Twiggs County, Georgia. It is approximately five (5) miles east of Robins Air Force Base and three (3) miles east of the Ocmulgee River. Maps of the Project are provided in the cultural resources report that is included as Attachment 1.

Degree of Federal Involvement

The Project would be partially funded by the EDF loan. The eligible portions of the Project include the purchase of components and installation/assembly of the BESS modules atop existing foundations. Project site preparation and related construction activities will **not** be subject to EDF funding (e.g., tree clearing, stump grubbing, erosion & sediment control measures, grading, stormwater drainage system, parking lot, laydown yard, perimeter fence poles/posts, underground wiring/lines/conduit and equipment foundations/slabs). GPC has already initiated and/or completed these activities using their own funds, and therefore, they are not eligible for funding under the EDF loan program, and as such, there is no federal action for these activities. However, the geographic areas for the activities that will not be subject to EDF funding are still included in the APE and covered by the pre-construction cultural resource surveys completed by the Applicant, as described below.

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. Within the APE, DOE EDF distinguishes different survey areas for identifying archaeological and historic architectural resources (hereafter, the "archaeological survey area" and "architectural survey area"). The archaeological survey area is defined as the construction footprint of the Project where potential physical effects caused by ground-disturbing activities may occur, also known as the limits of disturbance (LOD). The architectural survey area includes the area in the Project LOD and may apply a distance buffer, as appropriate, within which potential non-physical effects (e.g., visual, vibrational, auditory, or atmospheric) could occur. These survey areas collectively comprise the APE for the Project.

The Project's archaeological survey area includes the LOD for the BESS site and interconnection line, totaling approximately 21.6 acres. The Project's architectural survey area includes the LOD and the area within a 0.25-mile radius of the Project.

DOE EDF also acknowledges that Attachment 1 refers to the archaeological survey area as the “Direct APE” and the architectural survey area as the “Visual APE”, and notes that in accordance with the 2019 D.C. Circuit Court decision in *National Parks Conservation Association v. Semonite*, visual effects that are caused by the undertaking are considered direct effects.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following ten (10) federally recognized Tribes to see if they have an interest in the Project: Alabama-Quassarte Tribal Town; Coushatta Tribe of Louisiana; Kialegee Tribal Town; Miccosukee Tribe of Indians; Muscogee (Creek) Nation; Poarch Band of Creek Indians; Seminole Tribe of Florida; Seminole Nation of Oklahoma; Thlopthlocco Tribal Town; and United Keetoowah Band of Cherokee Indians in Oklahoma.

By separate letter sent concurrently with this submission to the SHPO, DOE EDF has requested Tribal respondents to provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and to identify any additional Tribes that may share an interest in the Project area so DOE EDF can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is requested or deemed necessary.

Records Search

As part of the Section 106 process, the Applicant contracted Edwards-Pitman, Inc. (EP) to conduct cultural resource identification surveys. EP prepared the cultural resources report that is included as Attachment 1 and summarized below.

Prior to fieldwork, EP searched Georgia’s Natural, Archaeological, and Historical Resources Geographic Information System (GNAHRGIS) online database, the National Register of Historic Places (NRHP), and several other archival resources to identify previously conducted surveys and previously recorded resources located within a 1-kilometer (km) radius surrounding the Project. This background research identified two (2) previous surveys that intersect the current APE. One (1) previously recorded archaeological site is located within the 1-km search radius but not within the current Project’s APE. No NRHP-listed properties or GNAHRGIS previously recorded historic architectural resources were identified within the 1-km search radius. Additional archival sources and databases that were consulted prior to fieldwork that did not identify any previously recorded resources in the APE or a 1-km search radius include the National Historic Landmarks database, American Battlefield Protection Program’s (ABPP) Civil War Sites Advisory Commission (CWSAC), ABPP Revolutionary War and War of 1812

sites, Find-a-Grave, historic transportation corridor sources (e.g. Historic Bridges, Historic Railroads, Historic Roads), historic maps (e.g., topographic maps and soil maps), aerial photographs (historic, modern, and street view), tax assessor records, and Georgia historic contexts.

Following the completion of background research, EP completed Phase I cultural resource surveys to identify newly recorded archaeological sites and historic aboveground resources within the APE. The results of the surveys are provided in Attachment 1 and summarized below.

Archaeological and Historic Architectural Surveys

The archaeological field survey consisted of pedestrian walkover of the archaeological survey area employing visual inspection of the ground surface and subsurface testing at 30-meter intervals. A total of 133 shovel tests were excavated. None of the shovel tests recovered cultural material, and no surface or subsurface features were encountered during the surveys. Thus, no archaeological resources were identified within the APE.

The historic architectural survey included a windshield and/or pedestrian survey from the public right-of-way. Any architectural resources 50 years of age or older located within the APE were photographically documented and recorded on Project maps. One (1) historic architectural resource was identified: a ca. 1900 Folk Victorian house designated as “Resource 1” (see Attachment 1). While the Folk Victorian style may be considered significant in Georgia, this particular example is clad entirely in non-historic vinyl siding, all of its historic windows have been replaced with incompatible non-historic vinyl counterparts, and its porch supports have been replaced. Therefore, it is considered to lack sufficient integrity and is considered not eligible for the NRHP. Additional details and maps are provided in Attachment 1.

In summary, no archaeological resources or historic architectural resources eligible for or listed in the NRHP were identified within the APE. Therefore, no historic properties are within the APE.

Requesting your Concurrence and Next Steps

Based on DOE EDF’s review of the efforts to identify historic properties and conclusions drawn from this information, DOE EDF is issuing a Finding of No Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Georgia SHPO on the Finding of No Historic Properties Affected, as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter.**

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the

affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact Molly Cobbs at 240-687-7266 or via email at EDF_Environmental@doe.gov.

Sincerely,

Donald J. Brown
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Cultural Resources Report

Attachment 2. Georgia SHPO Project Review and Consultation Form