



Department of Energy

Washington, DC 20585

September 9, 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, Wansley Battery Energy Storage System Project, Heard County, Georgia

Dear Mr. Nunn,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has executed a Federal loan guarantee agreement with Georgia Power Company (GPC or Borrower) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to GPC is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. GPC has identified the Wansley Battery Energy Storage System (BESS) Project (the Project) located in Heard County, Georgia, for potential inclusion in the loan guarantee.

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), and 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 proposed action is the issuance of Federal financing to the Borrower for the undertaking (i.e., the Project), which involves the construction and operation of a 500-megawatt (MW) electrochemical BESS with a new Generation Step-Up (GSU) substation, a new 34.5 kilovolt (kV) underground line, and a new 500 kV above-ground interconnecting tie-line. The Project also includes temporary laydown areas and workspace, and permanent access roads. The Project area consists of approximately 43 acres, the majority of which is located on a single, GPC-owned parcel.

Construction of the new BESS site includes rough grading and installation of shop-fabricated battery enclosures, inverter step-up transformers, auxiliary power system, BESS control system, private fire main, security system, and external fire alarm system. An Operations and Maintenance (O&M) building and permanent parking lot will also be installed within the Project site. The 500 kV tie-line will be approximately 300 feet long and will connect the BESS to the existing Wansley 500 kV Switchyard. The utility line structures for this new tie-line will be 80-90 feet tall, the same approximate height as those of the existing lines entering the substation.

The proposed Project site is located at 1371 Liberty Church Road, Franklin, Georgia, approximately 3.3 miles south of SR-5 and west of the Chattahoochee River. The Project site and the surrounding area are occupied by existing utilities including GPC's existing Plant Wansley site, GPC's existing 500 kV electrical switchyard, and transmission and distribution line corridors and associated rights-of-way (ROWs). Undeveloped wooded areas that would be cleared for Project construction are located outside of the Plant Wansley fenceline along the northern and southeastern margins of the Project area. Project maps are provided in the cultural resources report that is included as Attachment 1.

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 43-acre Project LOD that includes the BESS site, GSU substation, 34.5 kV underground line, 500 kV above-ground

interconnecting tie-line, temporary laydown areas and workspace, and permanent access roads. The Project's architectural survey area includes the LOD and the area within a 0.25-mile radius of the Project.

The cultural resources report included as Attachment 1 provides maps of the area surveyed. DOE EDF notes that broader 86-acre area was surveyed within which the 43-acre Project LOD will be located.

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 eleven (11) federally recognized Tribes to see if they have an interest in the Project: Alabama-Coushatta Tribe of Texas, 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 necessary or requested.

Records Search

As part of the Section 106 process, the Borrower 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) database, and other archival sources to identify previously conducted surveys and previously recorded resources located within a 1-kilometer radius surrounding the Project. This background research found no previous surveys within the study area. Five (5) previously recorded archaeological sites are located within the study area, none of which are within the current Project's archaeological survey area portion of the APE. No NRHP-listed properties, National Historic Landmarks, historic bridges, historic railroads, or GNAHRGIS previously recorded historic architectural resources were identified within the architectural survey area portion of the APE.

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. Again, DOE EDF notes that Attachment 1 includes survey coverage of a broader area totaling 86 acres within which the current 43-acre Project LOD will be located.

Archaeological Resources

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 396 shovel test locations were plotted across the surveyed area, 264 of which were excavated and 132 of which could not be excavated due to impenetrable gravel, inundation, buried utilities, or restricted areas within the existing Plant Wansley facility. Photographic documentation of the environs and disposition of the survey area are provided in Attachment 1. All shovel tests were negative for cultural material, and no surface features were identified during the survey. Therefore, no archaeological resources were identified within the APE.

Historic Architectural Resources

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. 1975 GPC electrical plant that is recommended as not eligible for the NRHP as most of the plant is non-historic, and the remaining historic-age features do not retain their spatial relationships due to intervening modern additions and structures, nor do they represent significant architectural types or styles. Additional details and maps are provided in Attachment 1.

In conclusion, no historic properties are present 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 me at 202-586-8716 or via email at EDF_Environmental@doe.gov.

Sincerely,

Kara J. Harris
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Cultural Resources Report

Attachment 2. Georgia SHPO Project Review and Consultation Form