

**Record of Categorical Exclusion**  
**for**  
**Alabama Power Company's**  
**Gorgas Battery Energy Storage System Project**  
**Loan Application #EIR0044**

**Description of Categorically Excluded Action**

The United States Department of Energy (DOE) Title XVII Energy Infrastructure Reinvestment (EIR, 1706) Program was established pursuant to the Inflation Reduction Act of 2022, which amended Title XVII of the Energy Policy Act of 2005 to include the EIR Program. The EIR Program provides loan guarantees for projects that either: (1) retool, repower, repurpose, or replace energy infrastructure that has ceased operations; provided that if the project involves electricity generation through the use of fossil fuels, it is required to have controls or technologies to avoid, reduce, utilize, or sequester air pollutants and anthropogenic emissions of greenhouse gases; or (2) projects that enable operating energy infrastructure to avoid, reduce, utilize, or sequester air pollutants or anthropogenic emissions of greenhouse gases.

The DOE Loan Programs Office (LPO) is considering whether to issue a loan guarantee of a funding facility to the Alabama Power Company (APC) pursuant to its authority under the EIR 1706 Program. In its application, APC has identified the Gorgas Battery Energy Storage System (BESS) project (Project), in Parrish, Walker County, Alabama, for inclusion in the funding facility that is the subject of DOE's loan guarantee. APC may request inclusion of multiple individual projects with independent utility in the funding facility that is the subject of the DOE loan guarantee; accordingly, DOE will complete an environmental review pursuant to the National Environmental Policy Act (NEPA) for these projects prior to their inclusion in the funding facility that is the subject of DOE's loan guarantee.

The Gorgas BESS Project will integrate into APC's electrical system to serve customers as a capacity resource while also supporting the integration of additional solar farms through ancillary regulation services and energy arbitrage. The key output of the Gorgas BESS project will be previously stored energy in the form of megawatt hours (MWh). Accordingly, the Proposed Action considered in this record of categorical exclusion is LPO's issuance of Federal financial support for the Gorgas BESS Project.

**Project Description**

APC proposes construction of a 150-MW BESS facility and substation, installation of battery packs, modification of an existing access road to the site, and the development of an approximate 0.21-mile-long generation tie-line on previously disturbed land. The proposed Project will be located on property owned by the Applicant at the site of the retired coal-fired Gorgas Steam Plant, approximately one mile southeast of Goodsprings, Alabama, on Route 57 (Goodsprings Road).

The Project will be located on approximately 36 acres and is comprised of four primary components: BESS facility, substation, transmission tie-line, and stormwater containment. A fence will be installed around the project and no new access roads to the Project site are planned. The rated power capacity of the Project will be 150-MW AC at the Point of Interconnect, and the rated energy storage capacity will be 109,500 MWh/Yr. The battery energy storage system will have a 2-hour discharge rate, a cycle average of once per day, and round-trip efficiency of 86%.

All proposed ground disturbance will take place within the 36-acre Project boundary, which was previously cleared and developed during operation of the steam plant. The BESS facility is accessible via existing roads.

The BESS and substation area, including a construction laydown area, will occupy approximately 10 acres within the 36-acre Project area, and will be located in the western portion of the retired Gorgas Steam Plant property adjacent to a remediated coal combustion residual impoundment area. Within the 10-acre area, the existing access road will be rerouted to the perimeter of the site and small interior roads may be constructed to connect to existing access roads. Battery packs will be mounted on concrete-pads on the central portion of the site with a 1.1-acre substation constructed on the northern portion of the site. Some vegetation was replanted or has regrown over time and will be cleared for the Project. Tree clearing and grading activities will be performed along the northwest and western boundary of the 10-acre area and along the 0.21-mile gen-tie Right-of-way (ROW), which traverses existing retired Gorgas Steam Plant property and connects to an existing transmission substation. A 7.3-acre stormwater containment area will be constructed adjacent to the BESS facility.

In accordance with the Endangered Species Act, LPO's review of the Project found that there would be *no effect* to designated critical habitat. Additionally, for eight Federally threatened, endangered, proposed, and candidate species (whooping crane, alligator snapping turtle, flattened musk turtle, black warrior waterdog, monarch butterfly, Cahaba shiner, Mohr's Barbara's buttons, and white fringeless orchid), LPO has reached a *no effect* determination based on the results of desktop and field-based assessments indicating no suitable habitat on site for these species. On February 18, 2025, the U.S. Fish and Wildlife Service concurred with a *may affect, not likely to adversely affect* determination for the Indiana bat, northern long-eared bat, and/or the tricolored bat given five trees exhibiting potential roost characteristics were identified for clearing to accommodate the BESS installation. These trees were removed during the hibernating range non-restricted time frame, October 1 - March 14. The remaining trees can be cleared without affecting any potential roost trees.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), LPO consulted with the Alabama State Historic Preservation Office (SHPO). The SHPO concurred with LPO's finding of *No Effect to Historic Properties* on May 2, 2025. LPO identified and contacted eight federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area (Alabama-Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Chickasaw Nation, Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Muscogee (Creek) Nation, Seminole Tribe of Florida). DOE received responses from the

Chickasaw Nation and Choctaw Nation of Oklahoma; both confirmed that they do not have concerns with the Project.

No impacts are anticipated to potentially jurisdictional wetlands and waters as the proposed design; all streams can be avoided during construction. As such, no impacts are anticipated that would require permitting under Section 404 of the Clean Water Act through the U.S. Army Corps of Engineers. The project area is located outside of 100- and 500-year floodplains.

APC will obtain the following permit(s) prior to initiating construction of the Project:

- Construction stormwater permit from the Alabama Department of Environmental Management, where required.

#### **Number and Title of Categorical Exclusion(s)**

The actions being considered under the Proposed Action are consistent with and covered by DOE categorical exclusions in 10 Code of Federal Regulations (CFR) Part 1021, Appendix B4, Categorical Exclusions Applicable to Electric Power and Transmission, respectively. This Project is covered by DOE Categorical Exclusions B4.11, B4.12, and B4.14.

##### *B4.11 Electric power substations and interconnection facilities*

Construction or modification of electric power substations or interconnection facilities (including, but not limited to, switching stations and support facilities).

##### *B4.12 Construction of powerlines*

Construction of electric powerlines approximately 10 miles in length or less, or approximately 20 miles in length or less within previously disturbed or developed powerline or pipeline rights-of-way.

##### *B4.14 Construction and Operation of Electrochemical-Battery or Flywheel Energy Storage Systems*

Construction, operation, upgrade, or decommissioning of an electrochemical-battery or flywheel energy storage system within a previously disturbed or developed area or within a small (as discussed at [10 CFR 1021.410\(g\)\(2\)](#)) area contiguous to a previously disturbed or developed area. Covered actions would be in accordance with applicable requirements (such as land use and zoning requirements) in the proposed project area and the integral elements listed at the start of [appendix B of this part](#), and would incorporate appropriate safety standards (including the current National Fire Protection Association 855, Standard for the Installation of Stationary Energy Storage Systems), design and construction standards, control technologies, and best management practices.

**Regulatory Requirements Defined in 10 CFR § 1021.410(b)**

The Proposed Action was subjected to an environmental due diligence review by DOE LPO staff to ensure it is consistent with the specific category of actions (categorical exclusion) contained in Appendix B of 10 CFR Part 1021 and the conditions for applying categorical exclusions specified in Section 410 of Part 1021. To ensure the requirements of Appendix B were met, LPO staff reviewed project-related documents obtained between May 2024 and August 2024 and participated in conference calls with APC staff to ensure a complete understanding of the activities associated with the project.

The environmental due diligence review determined that there is no controversy regarding the potential environmental impacts of the Proposed Action, and that the activities associated with the Federal financial support would not adversely affect any physical, biological, or socio-cultural resources associated with the deployment of the project. The environmental due diligence review determined the Proposed Action has not been segmented to meet the definition of a categorical exclusion.

The Comment section below is provided for any necessary clarifications concerning the findings listed above. Signature by APC's designated representative in the Corporate Validation section is an indication of APC's concurrence with the findings and determinations presented above.

**Comment(s)**

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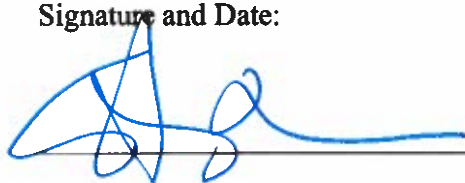
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**Corporate Validation**

Name and Title (Print):

Stacey Turner, VP Environmental Affairs

Signature and Date:

 5-7-25

**Determination**

Based on my review of information conveyed to me and in my possession concerning the actions associated with the proposed 1706 loan guarantee described above, as NEPA Compliance Officer (as prescribed in DOE Policy Directive 451.1), I have determined that the actions involve no extraordinary circumstances and fit within the specified category of actions in Appendix B of 10 CFR Part 1021 described above, and are hereby categorically excluded from further review under the National Environmental Policy Act (42 United States Code 4321, as amended).

**Signature and Date**

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Todd Stribley  
NEPA Compliance Officer  
Loan Programs Office

