

Record of Categorical Exclusion
for
Georgia Power Company's
Hammond Battery Energy Storage System Project
Loan Application #EIR0045

Description of Categorically Excluded Action

The United States Department of Energy (DOE), Loan Programs Office (LPO) may provide loan guarantees for energy infrastructure projects under section 1706 of Title XVII of the Energy Policy Act of 2005 (Energy Policy Act), as amended by the Inflation Reduction Act of 2022 (42 U.S.C. 16517) and the One Big Beautiful Bill Act (Pub. L. No. 119-21, 139 Stat. 72 (July 4, 2025)) (the Energy Dominance Financing or EDF Program). The purpose of the EDF Program is to finance projects and facilities in the U.S. that retool, repower, repurpose, or replace energy infrastructure that has ceased operations or enable operating energy infrastructure to increase capacity or output (42 U.S.C. 16517(a)(2) and (Pub. L. No. 119-21, 139 Stat. 72 (July 4, 2025))).

LPO is considering whether to issue a loan guarantee of a funding facility to the Georgia Power Company (GPC) pursuant to its authority under the EDF Program. In its application, GPC has identified the Hammond Battery Energy Storage System (BESS) project (Project), west of Rome in Floyd County, Georgia, for inclusion in the funding facility that is the subject of DOE's loan guarantee. GPC 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 Project will improve GPC's ability to reliably integrate additional renewable resources as identified in its 2022 Integrated Resource Plan as well as help GPC achieve its goal of implementing more battery energy storage systems by leveraging existing transmission interconnection resources. The key output of the Hammond 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 Hammond BESS Project.

Project Description

The proposed Project site is located between Alabama Highway and the Coosa River, approximately 0.4 miles east of Fosters Mill Road SW, approximately 9.7 miles west of downtown Rome, Georgia (Floyd County). The 7.95-acre BESS site is contained within a single area owned by GPC. The current condition of the site is characterized as a developed industrial area on an existing powerplant complex bordered by the Coosa River to the south and the East Tennessee, Virginia, and Georgia Railroad to the north. The Project Site was formerly used as a coal pile area

for Plant Hammond. Given past use of the site, the site does not currently support vegetative cover. No grubbing, tree removal, or other vegetative cover removal will be needed. However, minor grading may be needed in areas where the coal pile slopes are present.

GPC is proposing the construction and operation of a 250-MW electrochemical BESS with a new 230/34.5 kV step-up substation. The BESS will connect to the new substation via a series of underground 34.5 kV utility lines. The step-up substation will then connect to GPC's Hammond 115/230 kV substation via an approximately 300-foot-long overhead tie-line. Additionally, fire protection needs for the BESS will be served from an extension of an existing water main on the former Plant Hammond site. Electrical and communication lines will also run through portions of this same corridor to connect the battery modules to the new control center building at the facility. Phase 1 will include the installation of a 57.5 MW / 230 megawatt-hour (MWh) system and Phase 2 will include a 192.5MW / 770MWh system.

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, private fire main, security system, and external fire alarm system.

Project construction will be completed in two phases. The Project is scheduled to begin Phase I construction in July 2025 and Phase II is scheduled to begin construction in December 2028. The projected commercial operation date is November 2026 for Phase I and November 2030 for Phase II. The minimum expected lifespan of the BESS is 20 years.

Following construction, the area will be restored and stabilized in accordance with the Project's Erosion, Sedimentation and Pollution Control Plan (ES&PCP) and the Georgia Manual for Erosion and Sediment Control (Georgia Soil and Water Conservation Commission [GSWCC], 2016). The Project substation area scope includes rough grading only.

In accordance with the Endangered Species Act, LPO's review of the Project found that there would be *no effect* to Federally threatened, endangered, proposed, and candidate species or to designated critical habitat.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), LPO consulted with the Georgia State Historic Preservation Office (SHPO). On June 16, 2025, the Georgia SHPO concurred with LPO's finding of no adverse effect to historic properties provided that GPC avoid portions of two archaeological sites identified within the Area of Potential Effect (APE). While included within the APE for the purposes of Section 106 consultation, these areas are located outside of the project area footprint and will be avoided by GPC during construction and operation of the Project.

DOE identified and contacted thirteen (13) 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; Cherokee Nation; Coushatta Tribe of Louisiana; Eastern Band of Cherokee Indians; Kialegee Tribal Town; Miccosukee Tribe of Indians; Muscogee (Creek) Nation; Poarch Band of Creek Indians; Seminole Nation of Oklahoma; Seminole Tribe of Florida; Thlopthlocco Tribal Town; and United Keetoowah Band of Cherokee Indians in Oklahoma). The

Cherokee Nation provided comments to DOE on July 1, 2025. DOE considered all comments and responded to the Cherokee Nation on July 14, 2025. In lieu of additional surveys requested by the Cherokee Nation, GPC will implement a project-specific Unanticipated Discovery Protocol which stipulates notification of the appropriate law enforcement and SHPO in the event human remains are discovered during construction. GPC will also notify DOE and the federally recognized tribes, including the Cherokee Nation.

Two non-jurisdictional drainage features and one non-jurisdictional detention basin are adjacent to the project area. No impacts are anticipated on potentially jurisdictional wetlands or waters of the U.S. and, as such, no permitting is required under Section 404 of the Clean Water Act. The project area is located outside of 100- and 500-year floodplains.

Decommissioning and remediation of the former Plant Hammond coal pile was completed in 2020. There is no coal remaining in the area. Stormwater runoff from this area is currently covered under the State of Georgia's NPDES Industrial Stormwater Discharge General Permit (No. GAR 050000). BESS construction activities will be permitted via the State of Georgia's NPDES Construction Stormwater Discharge General Permit for Stand-Alone Construction Activities (No. GAR 100001; 2023).

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 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

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 102 of Part 1021. To ensure the requirements of Appendix B were met, LPO Environmental Compliance reviewed project-related documents obtained between March and July 2025 and participated in conference calls with GPC 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 GPC's designated representative in the Corporate Validation section is an indication of GPC's concurrence with the findings and determinations presented above.

Comment(s)

Corporate Validation



7/21/2025

Jennifer McNelly
Vice-President, Environmental Affairs
Georgia Power Company

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

Todd Stribley
NEPA Compliance Officer
Loan Programs Office