



# U.S. Department of Energy

## Categorical Exclusion Determination Form

<u>Categorical Exclusion Number:</u>	CX-270822
<u>Loan Application Number:</u>	EIR0045
<u>Proposed Action Title:</u>	Georgia Power Company: McGrau Ford Battery Energy Storage System Project
<u>Program of Field Office:</u>	Loan Programs Office
<u>Location(s) (City/County/State):</u>	Ball Ground, Georgia (Cherokee County)

Proposed Action Description:

**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, 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 Georgia Power Company (GPC) pursuant to its authority under the EDF Program. In its application, GPC has identified McGrau Ford Battery Energy Storage System (BESS) project (Project) 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 purpose of the project is to improve GPC's ability to reliably integrate additional generation resources and help GPC achieve its goal of implementing more battery energy storage systems by leveraging existing transmission interconnections. Accordingly, the Proposed Action considered in this record of categorical exclusion is LPO's issuance of Federal financial support for the battery purchase and battery installation of the Project.

**Project Description**

The 32-acre Project site is located along Conns Creek Road, 2.8 miles southeast of Ball Ground, Georgia and approximately 0.5 miles east of GPC's existing McGrau Ford Substation.

GPC is proposing the construction and operation of a 265MW, 4-hour duration electrochemical BESS and a 265MW, 2-hour duration electrochemical BESS that will interconnect to GPC's existing 230 kilovolt (kV) transmission system. Project construction will be completed in two phases. Phase 1 will include the installation of a 265MW / 530 megawatt-hour (MWh) system and Phase 2 will include a 265MW / 1060MWh system, both on existing foundations that are already in place.

**LPO's Proposed Action is limited to the purchase and installation of a 265-megawatt (MW), 4-hour duration electrochemical BESS on existing foundations (Phase I) and a 265MW 2-hour duration electrochemical BESS on existing foundations (Phase II).** No ground disturbing activities are associated with LPO's Proposed Action.

Batteries and associated materials will be delivered to the site via existing surface roads and in accordance with applicable road use agreements.



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The Project will include the installation of shop-fabricated battery enclosures on existing concrete pads, inverter step-up transformers, auxiliary power system, site building, power plant control system, private fire main, security system, and external fire alarm system.

Each battery enclosure includes fire detection and prevention systems to monitor and respond to battery fires, as well as battery management and exhaust ventilation systems to prevent fires. An existing 1.25-mile water line and associated tie-in provides water to the Project site's operations and maintenance building and the firewater loop surrounding the BESS facility.

The Project is scheduled to begin installation in late September 2025, with a projected commercial operation date of May 2026. The BESS is anticipated to have a lifespan of 20 years.

On September 5, 2024, GPC initiated informal consultation with the U.S. Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act (ESA), as amended (16 U.S.C. 1531, *et seq.*). The Project is located within the range of species protected by the ESA, including: the proposed threatened monarch butterfly (*Danaus plexippus*), the endangered gray bat (*Myotis grisescens*), the endangered northern long-eared bat (*Myotis septentrionalis*), the proposed endangered tricolored bat (*Perimyotis subflavus*), the non-essential experimental population whooping crane (*Grus americana*), the endangered amber darter (*Percina antesella*), the threatened Cherokee darter (*Etheostoma scotti*), the endangered Etowah darter (*Etheostoma etowahae*), and the threatened frecklebelly madtom (*Noturus munitus*).

The proposed project is located within the ranges of the northern long-eared bat and tricolored bat, and suitable roosting and foraging habitats for these species are present on site. Approximately 20 acres of habitat will be cleared because of the project. However, tree clearing activities will not occur during the non-volant pup season of May 15-July 31. Additionally, any temporary lighting needed for the completion of the project will be pointed down and away from forested areas. Permanent lighting will consist of downward facing, full cut-off lenses. No culverts or bridges will be replaced or modified as part of the project. No caves or mines will be impacted by the project.

On September 27, 2024, the U.S. Fish and Wildlife Service concurred with "may affect, not likely to adversely affect" determinations for the northern long-eared bat and the tricolored bat. For all other species, DOE has reached a "no effect" determination.

On September 2, 2025, DOE requested a new official species list to confirm species with potential to occur in the project area. There have been no changes between the September 2024 and September 2025 lists.

In accordance with the National Historic Preservation Act, LPO consulted with the Georgia State Historic Preservation Office (SHPO) and thirteen (13) federally recognized Indian Tribes and Tribal Nations (Tribes) that may have an interest in the Project area. The tribes included: 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 Tribe of Florida; Seminole Nation of Oklahoma; Thlopthlocco Tribal Town; and United Keetoowah Band of Cherokee Indians in Oklahoma. No tribes responded. The Georgia SHPO concurred with LPO's finding of No Historic Properties Affected for this Project on September 19, 2025.

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE LPO 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 being notified of the discovery, pursuant to 36 CFR 800.13(b)(3).

The following permits or authorizations will be obtained prior to construction or commercial operation, as applicable:

- Cherokee County Fire Marshall review and approval for compliance with State Fire Code, including NFPA 855 standard for energy storage systems.



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### Categorical Exclusion(s) Applied:

B4.14 - Construction and operation of electrochemical-battery or flywheel energy storage

### Categorical Exclusion(s) Description:

The Project is consistent with and covered by DOE categorical exclusions in 10 Code of Federal Regulations (CFR) 1021, Appendix B4, Categorical Exclusions Applicable to Electric Power and Transmission. Specifically, the Project is covered by DOE Categorical Exclusion B4.14, Construction and Operation of Electrochemical-Battery or Flywheel Energy Storage Systems.

#### *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.

Per 10 CFR 1021.102, application of categorical exclusions (classes of actions that normally do not require EAs or EISs), the following clarifications are provided to assist in the appropriate application of categorical exclusions that employ the terms or phrases “previously disturbed or developed” and “small” or “small- scale”:

- (1) *“Previously disturbed or developed” refers to land that has been changed such that its functioning ecological processes have been and remain altered by human activity. The phrase encompasses areas that have been transformed from natural cover to nonnative species or a managed state, including, but not limited to, utility and electric power transmission corridors and rights-of-way, and other areas where active utilities and currently used roads are readily available.*
- (2) *DOE considers terms such as “small” and “small-scale” in the context of the particular proposal, including its proposed location. In assessing whether a proposed action is small, in addition to the actual magnitude of the proposal, DOE considers factors such as industry norms, the relationship of the proposed action to similar types of development in the vicinity of the proposed action, and expected outputs of emissions or waste. When considering the physical size of a proposed facility, for example, DOE would review the surrounding land uses, the scale of the proposed facility relative to existing development, and the capacity of existing roads and other infrastructure to support the proposed action.*

### Regulatory Requirements Defined in 10 CFR § 1021

The proposed loan guarantee for actions described above was subjected to an environmental due diligence review by DOE LPO staff to ensure consistency with the specific category of action (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 that the requirements of Appendix B were met, LPO Environmental Compliance obtained numerous project-related documents between March and September 2025 and participated in several 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 Project, and that the actions associated with the loan guarantee would not adversely affect any physical, biological, or





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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.

Signature by GPC's designated representative in the Corporate Validation section (below) is an indication of GPC's concurrence with the findings and determinations presented above.

For the DOE procedures regarding categorical exclusions, including the full text of each categorical exclusion, see [10 CFR 1021.102](#) and Appendix B to 10 CFR Part 1021, and also Section 5.4 (Applying one or more categorical exclusions to a proposal) and Appendices B and C of [DOE's National Environmental Policy Act Implementing Procedures](#) (June 30, 2025).

**Requirements and guidance in 10 CFR 1021.102 and DOE's NEPA Implementing Procedures:** (See full text in regulation and in Implementing Procedures)

- ☒ The proposal fits within a class of actions that is listed in Appendix B to 10 CFR Part 1021 or Appendix B and C of DOE's NEPA Implementing Procedures (June 30, 2025).

To fit within the classes of actions listed in Appendix B to 10 CFR Part 1021, or Appendix B of DOE's NEPA Implementing Procedures, a proposal must satisfy the conditions that are integral elements of the classes of actions in Appendix B of both 10 CFR Part 1021 and DOE's NEPA Implementing Procedures.

- ☒ There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal. DOE or an applicant may modify the proposal to avoid reasonably foreseeable adverse significant effects such that the categorical exclusion would apply.

- ☒ The proposal has not been segmented to meet the definition of a categorical exclusion.

[Note: For proposals that fit within the categorical exclusions listed in Appendix C of DOE's NEPA Implementing Procedures, see DOE's notice of adoption for the subject Appendix C categorical exclusion for additional considerations. DOE notices of adoption for other agency categorical exclusions may be found on [DOE's Section 109 webpage](#).]

Based on my review of the proposed action, as NEPA Compliance Officer, I have determined that the proposed action fits within the specified class(es) of action, the other requirements and guidance set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

### Corporate Validation:

Applicant Signatory: Jennifer McNelly  
Vice President, Environmental Affairs  
Georgia Power Company

Signature:

Date:

9/23/25

DOE Signatory: Todd Stribley  
Director, Environmental Compliance  
DOE Loan Programs Office

Signature:

Date Determined:

9/23/2025