U.S. Department of Energy
Categorical Exclusion Determination Form

Categorical Exclusion Number:	CX-270886
Loan Application Number:	EIR0045
Proposed Action Title:	Burton Development – Generating Unit Upgrades and Obermeyer Gates
Program of Field Office:	Office of Energy Dominance Financing
Location(s) (City/County/State):	Rabun, Habersham, and Stephens counties, Georgia, and Oconee County, South Carolina

Proposed Action Description:

Description of Categorically Excluded Action

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF), 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)).

EDF 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 the Burton Development – Generating Unit Upgrades and Obermeyer Gates 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 Project consists of two components: 1) upgrading two generating units and 2) replacing the existing bottom-hinged spillway gates with an Obermeyer gate system. Accordingly, the Proposed Action considered in this record of categorical exclusion is EDF's issuance of Federal financial support for the Project.

Project Description

The Burton Development (dam) is the farthest upstream development of the North Georgia Hydroelectric Project, located on the Tallulah River in Rabun County, Georgia. The powerhouse is located at 220 Day Lily Lane, Clayton, Georgia. GPC owns the land occupied by Burton dam, the project works, and existing work areas. The development does not occupy any federal or Tribal lands.

The Burton Development operates in a modified run-of-river mode and consists of: (1) a 128-foot-high concrete gravity dam with a 296.5-foot-long left non-overflow section (including 56.3-foot-long core wall), a 197-foot-long gated spillway, a 69.5-foot-long sluiceway section, a 64-foot-long intake section, and a 360.5-foot-long right non-overflow section; (2) a 2,775-acre reservoir (Lake Burton); (3) two steel penstocks; (4) a powerhouse at the toe of the dam with a total installed capacity of 8.1 MW; (5) a tailrace; and (6) other appurtenances. The powerhouse contains two vertically oriented generating units, each with a hydraulic capacity of 700 cubic feet per second (cfs) and rated capacity of 4.05 MW. The existing Burton spillway consists of eight spillway bays integral to the dam structure, each containing a bottom-hinged gate controlled by electric actuators and cables.

The Project consists of (1) upgrading the two generating units and associated balance of plant and common support systems in the Burton powerhouse and (2) replacing the existing spillway gates with an Obermeyer gate system as described below.

Generating Unit Upgrades

The unit upgrades would increase the Burton Development's installed capacity from 8.1 megawatts (MW) to 9.6 MW, and the maximum hydraulic capacity would remain unchanged (700 cfs). The unit upgrades are expected to increase the rating for each unit by 0.75 MW and increase each unit's efficiency.

GPC is proposing to upgrade the two generating units in the powerhouse by replacing the turbine runners and generators to continue to meet the operational requirements of its existing FERC license. The hydraulic capacity of each unit would remain unchanged at 700 cfs. The unit upgrades are scheduled to begin in 2026 and are expected to take approximately 4 months per unit. During construction, flows that exceed the hydraulic capacity of the powerhouse would be passed over the spillway. The project will not require a drawdown of Lake Burton. All construction work related to the unit upgrades would take place inside the powerhouse.

GPC's project also includes modernizing and replacing balance of plant and common support systems essential to efficient operation of the upgraded units just prior to and coincident with the unit upgrade work. These systems support the operations of the turbines and generators, have been repaired as needed for the life of the Burton Development, and are now obsolete. To ensure the upgraded units are operating in peak, new condition, these systems must be demolished and removed and replaced with new balance of plant and common support systems at the same time the units are taken apart for the upgrades. If these systems are not replaced prior to startup of the upgraded units, the new units could not be guaranteed to meet equipment warranties, and this may cause the units to have shorter than expected service lives.

Spillway Gates

The project will also include replacing the existing spillway gates with an Obermeyer gate system that will be pneumatically operated by inflating or deflating a rubber bladder, changing the mechanism by which the gates are raised and lowered. The replacement of the existing gates is necessary for continued operation of Burton dam during high flow events and will enable plant operators to better control reservoir operations. The installation of the Obermeyer gate system is anticipated to last 18 to 24 months, with all work conducted behind a bulkhead, preventing the need for a reservoir drawdown. The spillway gate bays will not be available to pass river flows while under construction; however, the maximum number of bays that will be out of service at one time during the gate removal will be determined in consultation with FERC's Atlanta Regional Office. There would be no temporary or permanent changes to the operation of the Burton Development, and it would continue to operate according to the existing FERC license conditions during and after project construction.

The spillway gates replacement requires a new, approximately 16-foot by 33-foot control building to be constructed to house the equipment and instrumentation necessary to operate the Obermeyer gates. The approximately 530-square-foot corrugated metal control building will be constructed between the dam and powerhouse.

There is no ground disturbance associated with the project. Georgia Power originally planned to install the Obermeyer system control building on the abutment at the top of the dam and had proposed a storage building between the dam and the powerhouse. It was determined that the storage building was no longer needed and to relocate the control building to the backside of the powerhouse. This eliminates any ground disturbance near the spillway and allows for safer operation of the Obermeyer gates. The operator on duty will be able to visually see the tailrace and observe for the presence of people or boats, prior to opening the spillway gates. Georgia Power will utilize existing work areas near the dam for contractor parking, material laydowns, and construction trailers for workers. The proposed building footprint and existing work areas are located within

previously disturbed areas. Existing roads will be utilized to access the powerhouse, location of new control building, and existing work areas.

Required Consultations, Reviews, and Approvals

In accordance with Section 7 of the Endangered Species Act, EDF's review of the Project found that there would be no effect to designated critical habitat. Additionally, for nine Federally threatened, endangered, proposed, and candidate species with potential to occur in the Project area (gray bat, northern long-eared bat, tricolored bat, bog turtle, monarch butterfly, small whorled pogonia, swamp pink, white fringeless orchid, and rock gnome lichen), EDF has reached a *no effect* determination for all species based on all project activities occurring within or on existing structures, no reservoir drawdowns required, and no vegetation removal is required for this project. Additionally, equipment laydown areas will be in existing compacted gravel lots.

The Burton Development was completed in 1919 and is eligible for listing in the National Register of Historic Places (NRHP) individually, and as part of the North Georgia Project under NRHP Criterion A and Criterion C. Pursuant to Section 106 of the National Historic Preservation Act (NHPA), GPC consulted with the Georgia SHPO for the FERC license amendment application regarding the undertaking's effects on historic properties. The Georgia SHPO concurred that the spillway gates replacement (including the new control building) would not constitute an adverse effect to historic properties (including archaeological resources). However, GPC determined, and the Georgia SHPO concurred, that the generating unit upgrades constitute an adverse effect to historic properties. GPC developed an MOA with the Georgia SHPO that addresses mitigation for the adverse effects that would include development of Level II Historic American Engineering Record documentation. The MOA was signed by the Georgia SHPO and executed on October 6, 2025. Execution of the MOA fulfilled the FERC's obligations under the NHPA.

GPC's application for a Federal loan guarantee from DOE EDF for the Project introduces an additional Federal nexus triggering a review of this undertaking under Section 106 of the NHPA. FERC remains the lead federal agency for the undertaking. On November 25, 2025, DOE EDF consulted with the FERC and the Georgia SHPO to document DOE EDF's concurrence with the terms of the MOA as well as FERC's and SHPO's concurrence that the MOA resolves the adverse effects on historic properties inclusive of the proposed Federal financial support from DOE EDF for the undertaking.

Two hydropower license amendment applications are associated with the proposed project:

On August 13, 2024, Georgia Power filed a non-capacity amendment application with FERC to amend the North Georgia Project license to upgrade the two units at the Burton Development by replacing the turbine runners and generators. This amendment was approved by FERC on November 7, 2025.

On October 1, 2024, and supplemented on April 25, 2025, Georgia Power filed a non-capacity amendment application with FERC to replace the existing bottom-hinged spillway gates with Obermeyer gates and construct a new control building at the Burton Development. This amendment is anticipated to be complete in January 2026.GPC will not begin project activities related to replacing the spillway gates until this amendment is completed.

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Categorical Exclusion(s) Applied:

B1.3 Routine maintenance
B1.15 Support buildings
B1.31 Installation or relocation of machinery or equipment

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, Categorial Exclusions Applicable to Electric Power and Transmission. Specifically, the Project is covered by DOE Categorical Exclusions:

B1.3 Routine Maintenance

Routine maintenance activities and custodial services for buildings, structures, rights-ofway, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

(a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;

(b) Door and window repair or replacement;

(c) Wall, ceiling, or floor repair or replacement;

(d) Reroofing;

(e) Plumbing, electrical utility, lighting, and telephone service repair or replacement;

(f) Routine replacement of high-efficiency particulate air filters;

(g) Inspection and/or treatment of currently installed utility poles;

(h) Repair of road embankments;

(i) Repair or replacement of fire protection sprinkler systems;

(j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;

(k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);

(l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;

(m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;

(n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);

(o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and

(p) Removal of debris.

B1.15 Support Buildings

Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix.

B1.31 Installation or Relocation of Machinery and Equipment

Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.

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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 EDF 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, EDF Environmental Compliance obtained numerous project-related documents between October and December 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 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 herein.

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.

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.

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Corporate Validation:

Comments: _____

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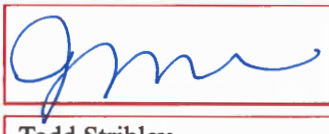
Applicant Signatory:	Jennifer McNelly Vice President, Environmental Affairs Georgia Power Company		
Signature:		Date:	12/15/25
DOE Signatory:	Todd Stribley Director, Environmental Programs DOE Office of Energy Dominance Financing		
Signature:	TODD STRIBLEY Digitally signed by TODD STRIBLEY Date: 2025.12.15 14:09:49 -07'00'	Date Determined:	12/15/2025