

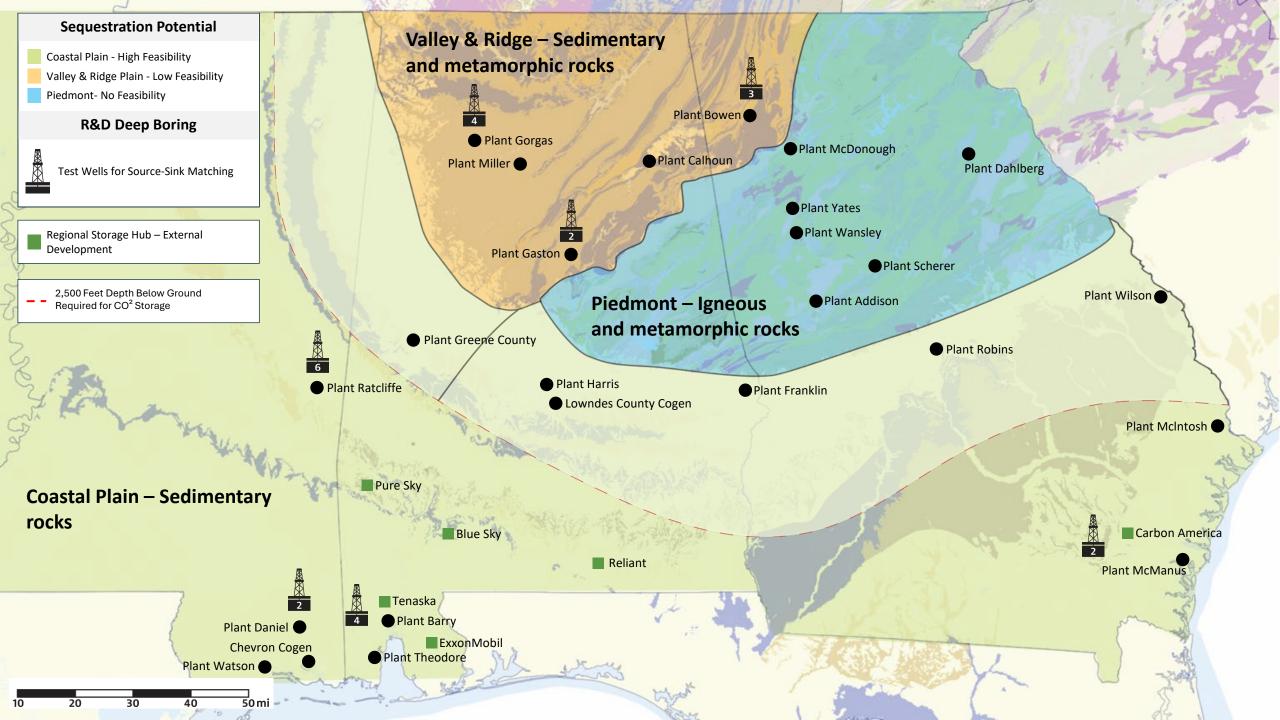




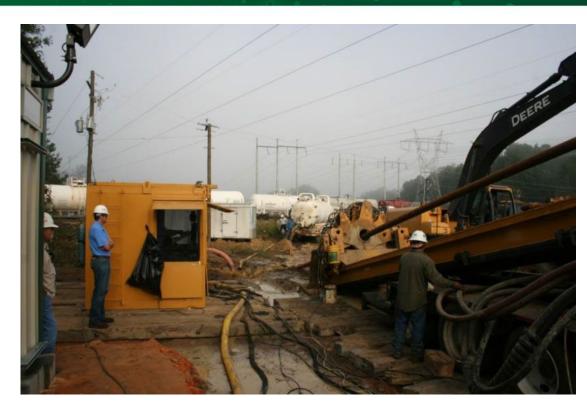
Research, Environment & Sustainability

Utility perspective - Low CI Power with CCS for Data Centers

- Everyone educating data center developers/investors on CCS
 - CCS projects are complex; costs, timeframes, siting, multiple participants
 - Location, location, location; capture sites with proximity to geology have potential for moving faster
 - Linear infrastructure can be hard; co-locating CO₂ pipelines with existing corridors offer pros and cons
- Owner understanding source to sink relationships with capture to storage
 - Regional Carbon Sequestration Partnerships/CarbonSAFE
 - Utility self-funded characterization (whether driven by 111D or IRP or R&D)
- Owner welcoming third party (T&S) development to the table
 - Early site permitting
 - Cost basis/reality with transport
 - Engagement with large landowners
- Everyone externalities
 - State driven regulatory/legislative action to de-risk (or not) storage development
 - Participation in outreach & stakeholder acceptance



CO₂ Pipeline Installation Plant Barry CCS Demonstration



DOT 29 CFR 195 4-inch carbon steel, liquid pipeline; buried 5 feet with surface vegetation maintenance



Directional drilled 18 sections of the pipeline under roads, utilities, railroad tracks, and wetlands (some up to 3,000 ft long and 60 ft deep)

Injection operations have a small footprint, but subsurface pore space requirements do not!









Some States are De-Risking Commercial CCS Activities

State Action

Impact

1

Clarify Oversight and Primacy

Several states have clarified regulatory oversight of CO_2 storage which is a critical step in pursuing state primacy over Class VI wells. Example: AL SB 36.

Pore Space Statutes

Clarify pore space ownership and establish amalgamation thresholds and procedures. Examples: AL SB 230, ND SB 2095.

3

Establish Trust Funds

Provide a mechanism to support state agencies and provide funds to support remediation if needed. Examples: LA HB 571.

4

Tax Incentive Structures

Provide a means to further incentivize project development by providing tax credits, direct support, or excluding CO₂ from sales taxes. Examples: CA LCFS, MS HB 1459, TX HB 3732.

Certainty and Expedited Review

Certainty around regulatory oversight is critical to project developers. In addition, state primacy is seen as critical to expediting permit review times..

1

Clarity Around Pore Space
Codified thresholds for amalgamation

thresholds and procedures simplifies land negotiations and associated risks.

2

Backstop and Perception

Ensures that personnel are in place to oversee these activities and provides an important backstop for long-term stewardship which is important to perception. 3

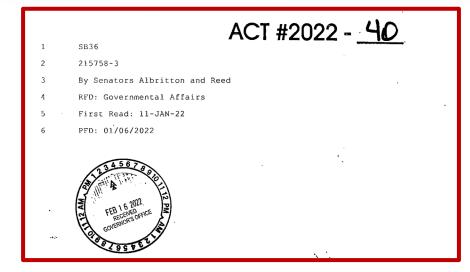
Payback, Create Marketplace

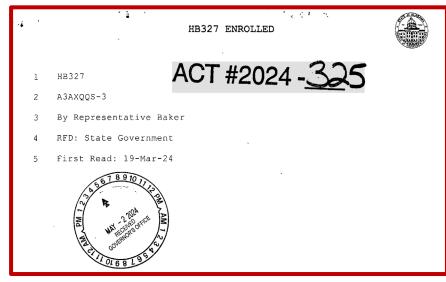
Creating incentives to deploy capital is critically important, as are mechanisms that support the creation of a CO_2 marketplace..

4

Regulatory Development for CO₂ Storage in Alabama

- Act 2022-40 amended OGB's natural gas storage statute to include "...carbon oxides, ammonia, hydrogen, nitrogen, noble gases..." and stated that this "... is in the public interest and welfare of this state and is for a public purpose."
- Act 2024-325 enabled OGB's regulatory authority and provided clarity to encourage development of a geologic storage industry in the State of Alabama.
 - Established two administrative funds:
 - ► For use during active operations
 - For long-term care
 - Provided parameters for ultimate closure of a storage facility.
 - Defined legal ownership of pore space-storage rights
 - Provided for the "amalgamation" of storage rightsanalogous to unitization for O&G
 - Allowed the State to lease state owned lands for storage







Understanding Business Model Options/Commercial Terms

Four primary business models are available to an electricity company and its electricity generation units (EGUs).

Section 45Q and data center development are evolving traditional business models.

- 1. Vertically Integrated Business Model "Doing it all by yourself"
- 2. Third-Party Business Model "Let someone else do it all"
- 3. Joint Venture Offtake Business Model "Let's do it together" (particularly with a 3rd party transportation and storage developer/owner/operator)
- Single source sink matching or hub-and-spoke regional storage networks

