

Module: Introduction

Page: Introduction

0.1

Introduction

Please give a general description and introduction to your organization

With 4.4 million customers and more than 42,000 megawatts of generating capacity, Atlanta-based Southern Company (NYSE: SO) is the premier energy company serving the Southeast United States.

A leading U.S. producer of electricity, Southern Company owns electric utilities in four states and a growing competitive generation company, as well as fiber optics and wireless communications. Southern Company brands are known for excellent customer service, high reliability, and retail electric prices that are below the national average.

0.2

Reporting Year

Please state the start and end date of the year for which you are reporting data.

The current reporting year is the latest/most recent 12-month period for which data is reported. Enter the dates of this year first.

We request data for more than one reporting period for some emission accounting questions. Please provide data for the three years prior to the current reporting year if you have not provided this information before, or if this is the first time you have answered a CDP information request. (This does not apply if you have been offered and selected the option of answering the shorter questionnaire). If you are going to provide additional years of data, please give the dates of those reporting periods here. Work backwards from the most recent reporting year.

Please enter dates in following format: day(DD)/month(MM)/year(YYYY) (i.e. 31/01/2001).

Enter Periods that will be disclosed

Fri 01 Jan 2010 - Fri 31 Dec 2010

0.3

Country list configuration

Please select the countries for which you will be supplying data. This selection will be carried forward to assist you in completing your response

Select country

United States of America

0.4

Currency selection

Please select the currency in which you would like to submit your response. All financial information contained in the response should be in this currency.

USD(\$)

0.5

Please select if you wish to complete a shorter information request

0.6

Modules

As part of the Investor CDP information request, electric utilities, companies with electric utility activities or assets, companies in the automobile or auto component manufacture sectors and companies in the oil and gas industry should complete supplementary questions in addition to the main questionnaire.

If you are in these sectors (according to the Global Industry Classification Standard (GICS)), the corresponding sector modules will be marked as default options to your information request. If you want to query your classification, please email respond@cdproject.net.

If you have not been presented with a sector module that you consider would be appropriate for your company to answer, please select the module below. If you wish to view the questions first, please see <https://www.cdproject.net/en-US/Programmes/Pages/More-questionnaires.aspx>.

Module: Management [Investor]

Page: 1. Governance

1.1

Where is the highest level of direct responsibility for climate change within your company?

Senior Manager/Officer

1.1a

Please identify the position of the individual or name of the committee with this responsibility

Southern Company's Chief Environmental Officer, who is also the Senior Vice President of Research and Environmental Affairs, is responsible for Southern Company's activities on climate change. He reports to the Southern Company Chief Operating Officer who reports to the Chairman, President, and Chief Executive Officer for Southern Company. In addition, the Company has established the Executive Climate Committee to review all of the climate change activities of the Company. The Executive Climate Committee is comprised of the Chief Operating Officer, the Chief Financial Officer, the Executive Vice President of External Affairs and the Executive Vice President, and Corporate General Counsel of Southern Company. Also, the full Board of Directors reviews the Company's environmental policy activities, including those on climate change. The Nuclear/Operations Committee of the Southern Company Board has general oversight responsibilities regarding significant information, activities, and events relative to the operations of the Company, including significant environmental policy and planning issues. This committee regularly reports to the full board.

1.2

Do you provide incentives for the management of climate change issues, including the attainment of targets?

No

1.2a

Please complete the table

Who is entitled to benefit from these incentives?	The type of incentives	Incentivised performance indicator
---	------------------------	------------------------------------

Page: 2. Strategy

2.1

Please select the option that best describes your risk management procedures with regard to climate change risks and opportunities

Integrated into multi-disciplinary company wide risk management processes

2.1a

Please provide further details (see guidance)

Southern Company has ongoing enterprise risk management and oversight processes as well as integrated planning processes that are intended to optimize risk management activities and responses across multiple risks. The Company conducts a formal risk identification and assessment process across all major business units and functional areas at least semi-annually. These risk assessments are consolidated into an enterprise view, which forms the basis for risk oversight by senior management and the board of directors. This comprehensive risk assessment process includes all the areas of significant risks to the Company, including potential price impacts on customers, reliability risk, regulatory risk, impacts on customer behavior, reputational risk, etc.

Minimizing cost impacts to our customers while meeting all compliance requirements and maintaining highly reliable service drives our generation and transmission planning decisions. In order to optimize planning decisions across competing factors and multiple potential scenarios, the Company utilizes integrated planning

processes. The overall planning processes are generally done on an annual cycle; however, they are continuous in nature and are updated as appropriate. While generation and transmission plans are ultimately intended to optimize decisions across the entire system, this is accomplished by bottom up analysis of individual generating units, transmission assets and customer classes. These integrated planning processes consider multiple environmental considerations and requirements rather than solely potential greenhouse gas regulation/legislation. Ultimately, the Company's generation and transmission plans must be approved by the state public service commissions.

2.2

Is climate change integrated into your business strategy?

Yes

2.2a

Please describe the process and outcomes (see guidance)

Southern Company's business strategy is focused on generating affordable and reliable electricity while being good a steward of the environment. As part of this strategy, Southern Company develops its environmental compliance strategy which includes the comprehensive involvement of a number of organizations from across Southern Company, including environmental, governmental affairs, planning, fuels, engineering, finance, operations, communications, generating plants, and research groups. The process evolves through a series of key meetings, presentations, and discussions where requirements, modeling data, emissions information, emissions technologies, cost, and schedules are examined in detail. This integrated process includes four steps as discussed below.

1. Predicting and integrating the outcome of new environmental requirements. The first step involves gathering all available knowledge about current and possible future local, state, regional, and national environmental requirements. The future requirements may be in the form of legislation that will need future rulemakings or in the form of draft or proposed new rules that must go through the rulemaking process to become final. Some rules may be part of an allowance-based cap and trade program over a regional or national scale and others may be local or state requirements that mandate specific requirements on specific plants. For many rules, the possibility that litigation will result in changes to the rule creates additional uncertainty

2. Developing assumptions on national, Southern Company, and Operating Company levels. To predict the impacts of the requirements on the generating plants, the company must make assumptions to predict generating unit, Southern Company, and national electric system responses to existing and future environmental requirements (in addition to growing demands for electricity). These assumptions include: unit operating characteristics such as heat rates, capacity, and emission rates; fuel characteristics and costs; allowance prices for cap and trade programs; control technology options and costs; and future generation demand.

To appropriately consider future legislative and market uncertainty, a scenario planning process is employed for long-term resource planning. A range of planning scenarios are developed and modeled as a part of the Company's Integrated Resource Planning (IRP) Process. This range was established through the work of a coordinated planning team consisting of internal and external subject matter experts and company planning managers. The planning scenarios identify two fundamental dimensions that affect the range of potential futures for the electric utility industry – fuel market supply fundamentals and CO2/renewables legislation.

Four fuel scenarios were constructed resulting in a range of fuel prices. Four climate change legislative scenarios were modeled for each of the fuel scenarios. This resulted in 16 individual outlooks of correlated fuel and emissions allowance prices, electricity demand and prices, and capacity and energy mixes. These scenarios represent fully integrated results. The company employs sophisticated multi-sector macro-economic modeling tools to simulate these scenarios. CO2 legislation and fuel prices can impact many sectors of the economy (e.g. electricity, transportation, manufacturing, industrial, commercial, and residential); therefore these and other sectors must be considered. CO2 legislation and higher fuel costs impact the economy by increasing energy prices and by changing the investment choices of consumers and business. CO2 legislation places a higher cost on CO2 and other GHG emissions. This along with varying projections of fuel prices would shift generation investment choices through retirements of existing capacity, installation of new environmental control technologies, and the construction of new replacement capacity. Higher CO2 and fuel costs lower economic activity and increase electricity prices; therefore, electricity sales would be expected to decrease. All of these interrelated factors, including reductions to load growth, are considered in the company's scenario modeling process.

3. Application of generating unit-specific cost-effective control technology options. The application of control technology is dictated initially by the anticipated environmental requirements for each specific generating plant and/or unit. In some cases, the plant or unit's emission control requirements are mandated, such as a specific limit to meet local air quality requirements. In some cases, such as the cap and trade program for SO2 established to address acid rain, utilities can choose the most cost-effective option: fuel switching, applying control technology, or purchasing emission allowances. The decision process reviews the cost-effectiveness of each of these options for each unit.

4. Determining and evaluating the financial impacts of the strategy. The final step is to make sure that the right economic decision is being made on a plant, operating company, and Southern Company basis for customers. Some units and plants may not be able to achieve the required emission reductions in a cost effective manner and would need to acquire additional allowances to comply. If emission controls are mandated for a specific unit, then the economic value of the generating asset including future operating costs must be considered before application of the technology.

After the process is completed and analyzed across the various planning scenarios, a strategy is compiled on a unit level and reviewed annually based on the most current information. One major goal of the environmental strategy process is to maintain flexibility by including as much information as possible in the process before making final decisions. If allowed by the regulations, controls are applied to the most cost-effective units first.

A key advantage of this process is that it allows decision making on an incremental basis. While the strategy includes emission control plans for the next 10 years, final decisions on specific pollution control projects are not made until commitments are required so that construction can commence. That is, while controls may be "planned" on a particular unit in 2016, no firm commitment to that plan will be made until necessary to assure that the emission control equipment is in place and operational when needed. This flexibility allows the Company to adapt to changing requirements and reduce costs to the customer.

Southern Company's business strategy also includes research and development on ways to reduce the greenhouse gas emissions. Southern Company's R&D activities make it a leader in developing new technologies and give the Company strategic advantage over its peers. The Company has managed nearly \$500 million in research and development over the past decade, seeking innovative ways to improve the generation, delivery, and use of electricity.

2.2b

Please explain why not

2.3

Do you engage with policy makers to encourage further action on mitigation and/or adaptation?

Yes

2.3a

Please explain (i) the engagement process and (ii) actions you are advocating

Southern Company engages with policy makers, specifically the U.S. Department of Energy, to further action on the mitigation of greenhouse gas emissions. This engagement happens through the National Carbon Capture Center (NCCC). NCCC is a focal point of U.S. Department of Energy's efforts to develop advanced technologies to reduce greenhouse gas emissions from coal-based power generation. The NCCC, managed and operated by Southern Company in Alabama, works with scientists and technology developers from government, industry and universities who are creating the next generation of carbon capture technologies. This engagement is also happening through a start-to-finish carbon capture and storage project at Alabama Power's Plant Barry. When completed, the facility will be the largest in the world to be connected to a pulverized coal-fired generating plant. Alabama Power and Southern Company, along with the U.S. Department of Energy, Mitsubishi Heavy Industries Ltd., the Electric Power Research Institute and others are partners in building the project.

Page: 3. Targets and Initiatives

3.1

Did you have an emissions reduction target that was active (ongoing or reached completion) in the reporting year?

No

3.1a

Please provide details of your absolute target

ID	Scope	% of emissions in scope	% reduction from base year	Base year	Base year emissions (metric tonnes CO2e)	Target year	Comment
----	-------	-------------------------	----------------------------	-----------	--	-------------	---------

3.1b

Please provide details of your intensity target

ID	Scope	% of emissions in scope	% reduction from base year	Metric	Base year	Base year emissions (metric tonnes CO2e)	Target year	Comment
----	-------	-------------------------	----------------------------	--------	-----------	--	-------------	---------

3.1c

Please also indicate what change in absolute emissions this intensity target reflects

ID	Direction of change anticipated in absolute Scope 1+2 emissions at target completion?	% change anticipated in absolute Scope 1+2 emissions	Direction of change anticipated in absolute Scope 3 emissions at target completion?	% change anticipated in absolute Scope 3 emissions	Comments
----	---	--	---	--	----------

3.1d

Please provide details on your progress against this target made in the reporting year

ID	% complete (time)	% complete (emissions)	Comment
----	-------------------	------------------------	---------

3.1e**Please explain (i) why not; and (ii) forecast how your emissions will change over the next five years**

Southern Company does not have a greenhouse gas emissions reduction target. However, the Company is committed to improving its environmental performance and the communities it serves by being a good environmental steward and working to conserve valuable natural resources. Southern Company employees, customers, and the public, and the protection of the natural environment, are among the Company's highest priorities.

The Southern Company system provides retail electric service as regulated by the public service commissions in the states it serves and by federal energy agencies. Public service commissions determine fair electric rates and oversee what project costs can be recovered (for environmental controls, plant construction, and other energy programs). As regulated utilities, Southern Company's traditional Operating Companies have a responsibility to deliver affordable and reliable service to its customers. Additional costs due to reductions in greenhouse gas emissions could affect results of operations, cash flows, and financial condition if such costs are not recovered through regulated rates. Further, higher costs that are recovered through regulated rates could contribute to reduced demand for electricity, which could negatively impact results of operations, cash flows, and financial condition.

Over the next five years, it is uncertain how Southern Company's greenhouse gas emissions will change. Southern Company's greenhouse gas emissions are based in part on uncontrollable factors such as electricity demand, fuel prices, and the availability of cost-effective technology. However, within the next five years, Southern Company is adding new low-carbon generation to its fleet which will likely lead to a reduction in the Company's greenhouse gas emissions intensity.

- The Kemper County Integrated Gas Combined Cycle (IGCC) Project is a 582 MW project in Kemper County, Mississippi. It will capture 65 percent of carbon dioxide to be sold for enhanced oil recovery. This project is the only IGCC plant in the U.S. that will begin capturing and storing carbon dioxide emissions the day it begins commercial operation. In addition, IGCC technology has fewer nitrous oxide, sulfur dioxide and mercury emissions than traditional pulverized coal technology.
- New nuclear units, Vogtle 3 & 4, are currently being constructed in Georgia and are scheduled to begin commercial operation in 2016 and 2017, respectively. Georgia Power Company will have a 45.7% undivided ownership in both of the approximately 1100 MW units.
- Southern Company's wholesale subsidiary, Southern Power, has begun construction of a 100-megawatt (MW) biomass plant in Sacul, Texas, that will be one of the largest in the country. The 100-megawatt Nacogdoches Generating Facility will serve the city of Austin.
- A partnership with The Westervelt Company will provide 7.5 MW of renewable energy from wood byproducts that Alabama Power will use to further diversify its mix of electricity fuel sources.
- Southern Company and Turner Renewable Energy run the Cimarron Solar Facility in New Mexico. The electricity generated at the facility supplies power equivalent to meet the needs of approximately 9,000 homes. The facility is one of the largest solar photovoltaic plants in the United States.
- Southern Company is ranked 7th in the nation for hydroelectric power generation, with a combined generating capacity of 2,758 MW. Sixteen MW of new hydro capacity is planned for the next five years, and other incremental opportunities are being evaluated.

3.2

Does the use of your goods and/or services directly enable GHG emissions to be avoided by a third party?

No

3.2a

Please provide details (see guidance)

3.3

Did you have emissions reduction initiatives that were active within the reporting year (this can include those in the planning and/or implementation phases)

Yes

3.3a

Please provide details in the table below

Activity type	Description of activity	Annual monetary savings (unit currency)	Investment required (unit currency)	Payback period
Other	Residential New Home and Equipment Programs - Energy star standards in new home construction		3007964	
Other	Energy Audits - Southern Company's operating companies perform energy audits of existing homes		2578619	
Energy efficiency:	Other Building Shell and HVAC - Other existing building shell and HVAC efficiency improvements		2453454	

Activity type	Description of activity	Annual monetary savings (unit currency)	Investment required (unit currency)	Payback period
building fabric				
Energy efficiency: building fabric	Commercial buildings - Incentivize use of more efficient construction for commercial customers		446496	
Energy efficiency: building services	Geothermal Heat Pump Incentives - Incentives for the installation of geothermal heat pumps		367331	
Other	Energy Services - Commercial energy audits		1932667	
Other	Appliance - Incentivize use of higher efficiency appliances through Energy Star, added insulation and recycling programs		1945586	
Other	Information Programs - Informational programs to educate customers on energy efficiency		8028409	
Energy efficiency: building services	Lighting - Incentivize use of higher efficiency lighting		372361	
Energy efficiency: building services	Low Income Weatherization - Building shell improvement program for low income customers		1999523	
Low carbon energy installation	Cimarron Solar Generating Facility - Southern Company and Turner Renewable Energy acquired the Cimarron Solar Facility in March 2010. The electricity generated at the facility supplies power equivalent to meet the needs of approximately 9,000 homes. The facility is one of the largest solar photovoltaic plants in the United States.			

3.3b

What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Compliance with regulatory requirements/standards	Our comprehensive environmental compliance strategy process is used to evaluate applicability of regulations and define compliance options.
Dedicated budget for energy efficiency	We have dedicated budgets for energy efficiency in each jurisdiction that are approved by each commission based on jurisdiction specific cost effectiveness criteria.

Method	Comment
Dedicated budget for low carbon product R&D	Yes, as part of our overall R&D effort utilizing both internal R&D funding and collaboration with Industry co-funders.
Employee engagement	Southern Company supports carpooling and incentives for innovations.
Financial optimization calculations	This is part of the integrated planning processes.
Internal price of carbon	The integrated planning processes consider multiple scenarios, including various potential carbon costs.
Internal incentives/recognition programs,	Southern Company has programs to incentivize and recognize innovations.
Internal finance mechanisms	Financial criteria apply to all investment activities.
Marginal abatement cost curve	Least cost planning implicitly considers marginal abatement costs.
Partnering with governments on technology development	Yes, our private sector R&D efforts are leveraged in partnership with Government funding to enable CO2 capture and low carbon technology development and demonstration.
Dedicated budget for other emission reduction activities	Yes, our environmental compliance strategy process is an ongoing process that continually evaluates the applicability of regulations and defines compliance options, which in many cases results in emission reductions.

3.3c

If you do not have any emissions reduction initiatives, please explain why not

Page: 4. Communication

4.1

Have you published information about your company's response to climate change and GHG emissions performance for this reporting year in other places than in your CDP response? If so, please attach the publication(s)

Publication	Page/Section Reference	Identify the attachment
In annual reports (complete)	Pg. II-27-28/"Global Climate Issues"; Pg.I-17-I-19/"Risks Related to Environmental and Climate Change Legislation, Regulation, and Litigation"	Southern Company's US Securities Exchange Commission Form 10-K
In voluntary communications	The entire report	Taking Action - Southern Company and Greenhouse Gases

Publication	Page/Section Reference	Identify the attachment
(complete)		
In other regulatory filings (underway) – this is our first year		
In voluntary communications (complete)	Southern Company's Corporate Responsibility Report	http://www.southerncompany.com/corporateresponsibility/

Further Information

In September of 2011, Southern Company will submit a greenhouse gas emissions report as part of the U.S. EPA Mandatory GHG Reporting Rule (40 CFR Part 98).

Southern Company's Corporate Responsibility Report is can be found on Southern Company's website at the following link: <http://www.southerncompany.com/corporateresponsibility/>. It is not attached because it is designed to preserve a single accurate, updateable, sustainable copy accessible to all via the Internet.

Attachments

[https://www.cdproject.net/Sites/2011/51/18951/Investor CDP 2011/Shared Documents/Attachments/InvestorCDP2011/4.Communication/Taking Action - Southern Company and GHGs.pdf](https://www.cdproject.net/Sites/2011/51/18951/Investor%20CDP%202011/Shared%20Documents/Attachments/InvestorCDP2011/4.Communication/Taking%20Action%20-%20Southern%20Company%20and%20GHGs.pdf)
[https://www.cdproject.net/Sites/2011/51/18951/Investor CDP 2011/Shared Documents/Attachments/InvestorCDP2011/4.Communication/Southern Company 10-K.pdf](https://www.cdproject.net/Sites/2011/51/18951/Investor%20CDP%202011/Shared%20Documents/Attachments/InvestorCDP2011/4.Communication/Southern%20Company%2010-K.pdf)

Module: Risks and Opportunities [Investor]

Page: 5. Climate Change Risks

5.1

Have you identified any climate change risks (current or future) that have potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

Risks driven by changes in regulation
Risks driven by changes in other climate-related developments

5.1a

Please describe your risks driven by changes in regulation

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
	Air pollution limits	Any mandatory limit on greenhouse gas emissions. This limit could come in the form of EPA's new source performance standards for greenhouse gases.	Increased operational cost	1-5 years	Direct	Very likely	Unknown
	Air pollution limits	Any mandatory limit on greenhouse gas emissions. This limit could come in the form of EPA's new source performance standards for greenhouse gases.	Increased capital cost	1-5 years	Direct	Very likely	Unknown
	Air pollution limits	Any mandatory limit on greenhouse gas emissions. This limit could come in the form of EPA's new source performance standards for greenhouse gases.	Reduction/disruption in production capacity	1-5 years	Direct	Very likely	Unknown
	Air pollution limits	Any mandatory limit on greenhouse gas emissions. This limit could come in the form of EPA's new source performance standards for greenhouse gases.	Reduced demand for goods/services	1-5 years	Direct	Very likely	Unknown
	Cap and trade schemes	Any mandatory greenhouse gas cap-and-trade scheme. In recent years, the U.S. Congress has considered bills with greenhouse gas cap-and-trade schemes.	Increased operational cost	Unknown	Direct	Unlikely	Unknown
	Cap and trade schemes	Any mandatory greenhouse gas cap-and-trade scheme. In recent years, the U.S. Congress has considered bills with greenhouse gas cap-and-trade schemes.	Reduced demand for goods/services	Unknown	Direct	Unlikely	Unknown

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
	Cap and trade schemes	Any mandatory greenhouse gas cap-and-trade scheme. In recent years, the U.S. Congress has considered bills with greenhouse gas cap-and-trade schemes.	Increased capital cost	Unknown	Direct	Unlikely	Unknown
	Carbon taxes	Any mandatory carbon tax. In recent years, the U.S. Congress has considered bills with carbon taxes.	Reduced demand for goods/services	Unknown	Direct	Unlikely	Unknown
	Carbon taxes	Any mandatory carbon tax. In recent years, the U.S. Congress has considered bills with carbon taxes.	Increased operational cost	Unknown	Direct	Unlikely	Unknown
	Carbon taxes	Any mandatory carbon tax. In recent years, the U.S. Congress has considered bills with carbon taxes..	Increased capital cost	Unknown	Direct	Unlikely	Unknown
	General environmental regulations, including planning	Any environmental regulation that includes mandatory greenhouse gas reductions.	Increased operational cost	1-5 years	Direct	Very likely	Unknown
	General environmental regulations, including planning	Any environmental regulation that includes mandatory greenhouse gas reductions.	Increased capital cost	1-5 years	Direct	Very likely	Unknown
	General environmental regulations, including planning	Any environmental regulation that includes mandatory greenhouse gas reductions.	Reduced demand for goods/services	1-5 years	Direct	Very likely	Unknown
	General environmental regulations, including planning	Any environmental regulation that includes mandatory greenhouse gas reductions.	Reduction/disruption in production capacity	1-5 years	Direct	Very likely	Unknown
	Uncertainty surrounding new regulation	EPA is regulating greenhouse gases under the Clean Air Act and is in the process of setting new source performance standards for greenhouse gases. The requirements of this regulation are unknown.	Increased operational cost	Unknown	Direct	Very likely	Unknown
	Uncertainty surrounding new regulation	EPA is regulating greenhouse gases under the Clean Air Act and is in the process of setting new source performance standards for greenhouse	Increased capital cost	Unknown	Direct	Very likely	Unknown

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
		gases. The requirements of this regulation are unknown.					
	Uncertainty surrounding new regulation	EPA is regulating greenhouse gases under the Clean Air Act and is in the process of setting new source performance standards for greenhouse gases. The requirements of this regulation are unknown.	Reduced demand for goods/services	Unknown	Direct	Very likely	Unknown
	Uncertainty surrounding new regulation	EPA is regulating greenhouse gases under the Clean Air Act and is in the process of setting new source performance standards for greenhouse gases. The requirements of this regulation are unknown.	Reduction/disruption in production capacity	Unknown	Direct	More likely than not	Unknown
	Fuel/energy taxes and regulations	Any mandatory fuel/energy tax or regulation.	Increased capital cost	Unknown	Direct	About as likely as not	Unknown
	Fuel/energy taxes and regulations	Any mandatory fuel/energy tax or regulation.	Increased operational cost	Unknown	Direct	About as likely as not	Unknown

5.1b

Please describe (i) the potential financial implications of the risk before taking action; (ii) the methods you are using to manage this risk; and (iii) the costs associated with these actions

Although the outcome of federal, state, and international initiatives cannot be determined at this time, mandatory restrictions on the Company's greenhouse gas emissions or requirements relating to renewable energy or energy efficiency on the federal or state level are likely to result in significant additional compliance costs, including significant capital expenditures. These costs could affect future unit retirement and replacement decisions, and could result in the retirement of a significant number of coal-fired generating units. Also, additional compliance costs and costs related to unit retirements could affect results of operations, cash flows, and financial condition if such costs are not recovered through regulated rates. Further, higher costs that are recovered through regulated rates could contribute to reduced demand for electricity, which could negatively impact results of operations, cash flows, and financial condition.

Southern Company has ongoing enterprise risk management and oversight processes as well as integrated planning processes that are intended to optimize risk management activities and responses across multiple risks. The Company conducts a formal risk identification and assessment process across all major business units and functional areas at least semi-annually. These risk assessments are consolidated into an enterprise view, which forms the basis for risk oversight by senior management and the board of directors. This comprehensive risk assessment process includes all the areas of significant risks to the Company, including potential price impacts on customers, reliability risk, regulatory risk, impacts on customer behavior, reputational risk, etc.

Minimizing cost impacts to our customers while meeting all compliance requirements and maintaining highly reliable service drives our generation and transmission planning decisions. In order to optimize planning decisions across competing factors and multiple potential scenarios, the Company utilizes integrated planning processes. The overall planning processes are generally done on an annual cycle; however, they are continuous in nature and are updated as appropriate. While generation and transmission plans are ultimately intended to optimize decisions across the entire system, this is accomplished by bottom up analysis of individual generating units, transmission assets and customer classes. These integrated planning processes consider multiple environmental considerations and requirements rather than solely potential greenhouse gas regulation/legislation. Ultimately, the Company's generation and transmission plans must be approved by the state public service commissions.

5.1c

Please describe your risks that are driven by change in physical climate parameters

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
----	-------------	-------------	------------------	-----------	------------------	------------	---------------------

5.1d

Please describe (i) the potential financial implications of the risk before taking action; (ii) the methods you are using to manage this risk; and (iii) the costs associated with these actions

5.1e

Please describe your risks that are driven by changes in other climate-related developments

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
	Changing consumer behaviour	Higher electricity costs could reduce demand for electricity.	Reduced demand for goods/services	1-5 years	Indirect (Client)	Very likely	Unknown

5.1f

Please describe (i) the potential financial implications of the risk before taking action; (ii) the methods you are using to manage this risk; (iii) the costs associated with these actions

Regulation of greenhouse gases could lead to additional compliance costs and costs related to unit retirements which could affect results of operations, cash flows, and financial condition if such costs are not recovered through regulated rates. Higher costs that are recovered through regulated rates could contribute to reduced demand for electricity, which could negatively impact results of operations, cash flows, and financial condition.

Southern Company has ongoing enterprise risk management and oversight processes as well as integrated planning processes that are intended to optimize risk management activities and responses across multiple risks. The Company conducts a formal risk identification and assessment process across all major business units and functional areas at least semi-annually. These risk assessments are consolidated into an enterprise view, which forms the basis for risk oversight by senior management and the board of directors. This comprehensive risk assessment process includes all the areas of significant risks to the Company, including potential price impacts on customers, reliability risk, regulatory risk, impacts on customer behavior, reputational risk, etc.

Minimizing cost impacts to our customers while meeting all compliance requirements and maintaining highly reliable service drives our generation and transmission planning decisions. In order to optimize planning decisions across competing factors and multiple potential scenarios, the Company utilizes integrated planning processes. The overall planning processes are generally done on an annual cycle; however, they are continuous in nature and are updated as appropriate. While generation and transmission plans are ultimately intended to optimize decisions across the entire system, this is accomplished by bottom up analysis of individual generating units, transmission assets and customer classes. These integrated planning processes consider multiple environmental considerations and requirements rather than solely potential greenhouse gas regulation/legislation. Ultimately, the Company's generation and transmission plans must be approved by the state public service commissions.

5.1g

Please explain why you do not consider your company to be exposed to risks driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

5.1h

Please explain why you do not consider your company to be exposed to risks driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

Any reasonably foreseeable physical climate parameters are within the wide band that Southern Company anticipates in order to operate its business currently. The operating results of Southern Company, the traditional Operating Companies, and Southern Power are always affected by weather conditions that may fluctuate on a seasonal to inter-annual basis. In addition, as has been the case over its nearly century of operations, significant weather events, such as hurricanes, tornadoes, floods, and droughts, or a terrorist attack could and have resulted in substantial damage to or limited the operation of the properties of the traditional Operating Companies and Southern Power and such events could negatively impact results of operation, financial condition, and liquidity.

Electric power supply is generally a seasonal business. In many parts of the country, demand for power peaks during the summer months, with market prices also peaking at that time. In other areas, power demand peaks during the winter. As a result, the overall operating results of Southern Company, the traditional Operating Companies, and Southern Power in the future may fluctuate substantially on a seasonal basis. In addition, the traditional Operating Companies and Southern Power have historically sold less power when weather conditions are milder. Unusually mild weather could reduce the revenues, net income, available cash, and borrowing ability of Southern Company, the traditional Operating Companies, and Southern Power. Alternatively, unusually warm summer weather, or cold winter weather, could increase the revenues, net income, available cash, and borrowing ability of Southern Company, the traditional Operating Companies, and Southern Power.

In addition, volatile or significant weather events or a terrorist attack could, as they have in the past, result in substantial damage to the transmission and distribution lines of the traditional operating companies and the generating facilities of the traditional Operating Companies and Southern Power. The traditional Operating Companies and Southern Power have significant investments in the Atlantic and Gulf Coast regions which could be subject to major storm activity. Further, severe drought conditions can reduce the availability of water and restrict or prevent the operation of certain generating facilities.

Each traditional Operating Company maintains a monetary reserve for property damage to cover the cost of damages from weather events to its transmission and distribution lines and the cost of uninsured damages to its generating facilities and other property. In the event a traditional Operating Company experiences any of these weather events or any natural disaster, or other catastrophic event, such as a terrorist attack, recovery of costs in excess of reserves and insurance coverage is subject to the approval of its state PSC. While the traditional Operating Companies generally are entitled to recover prudently incurred costs incurred in connection with such an event, any denial by the applicable state PSC or delay in recovery of any portion of such costs could have a material negative impact on a traditional Operating Company's and Southern Company's results of operations, financial condition, and liquidity.

In addition, damages resulting from significant weather events within the service territory of any traditional Operating Company or affecting Southern Power's customers may result in the loss of customers and reduced demand for electricity for extended periods. For example, Hurricane Katrina hit the Gulf Coast of Mississippi in August 2005 and caused substantial damage within Mississippi Power's service territory. As of December 31, 2010, Mississippi Power had

approximately 4.3% fewer retail customers as compared to pre-storm levels. Any significant loss of customers or reduction in demand for electricity could have a material negative impact on a traditional Operating Company's, Southern Power's, and Southern Company's results of operations, financial condition, and liquidity.

5.1i

Please explain why you do not consider your company to be exposed to risks driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

Page: 6. Climate Change Opportunities

6.1

Have you identified any climate change opportunities (current or future) that have the potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

Opportunities driven by changes in other climate-related developments

6.1a

Please describe your opportunities that are driven by changes in regulation

ID	Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact
----	--------------------	-------------	------------------	-----------	-----------------	------------	---------------------

6.1b

Please describe (i) the potential financial implications of the opportunity; (ii) the methods you are using to manage this opportunity; (iii) the costs associated with these actions

6.1c

Please describe the opportunities that are driven by changes in physical climate parameters

ID	Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
----	--------------------	-------------	------------------	-----------	------------------	------------	---------------------

6.1d

Please describe (i) the potential financial implications of the opportunity; (ii) the methods you are using to manage this opportunity; (iii) the costs associated with these actions

6.1e

Please describe the opportunities that are driven by changes in other climate-related developments

ID	Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
	Changing consumer behaviour	Consumer behavior toward electric vehicles is an area of opportunity for Southern Company.	Increased demand for existing products/services	6-10 years	Indirect (Client)	More likely than not	Unknown

6.1f

Please describe (i) the potential financial implications of the opportunity; (ii) the methods you are using to manage this opportunity; (iii) the costs associated with these actions

- (i) Electric transportation, whether on-road or non-road, can help customers save money on fuel and maintenance costs, reduce their environmental impact, and contribute to our nation's energy security.
- (ii) Southern Company is leading the nation in non-road electric transportation technology. We are promoting a multitude of total electric non-road transportation and charging technologies at airports, seaports, rail yards, mines, and distribution centers, where electric equipment is used in almost every industry to move cargo, stock, pallets, and other materials. Southern Company advocates electric transportation technologies – both on-road and non-road – and we are ready to meet our customers' evolving electric transportation needs. Electric transportation represents an opportunity to enhance our customers' experience by helping them save money and reduce their environmental impact.
- (iii) The cost of the electric transportation initiative is included in the energy efficiency efforts of each of the operating companies. Furthermore, it is our responsibility to supply our customers with reliable electricity at the lowest prices possible. Staying abreast of the latest technological advancements is essential to our success, and Southern Company is also investing in research and development of new technologies and clean energy solutions to meet our customers' future energy needs.

6.1g

Please explain why you do not consider your company to be exposed to opportunities driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

Southern Company does not consider itself to be exposed to opportunities driven by changes in regulation. Regulatory requirements related to climate change will require increased expenditures, resulting in increases in the price of electricity.

6.1h

Please explain why you do not consider your company to be exposed to opportunities driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

6.1i

Please explain why you do not consider your company to be exposed to opportunities driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

Module: GHG Emissions Accounting, Energy and Fuel Use, and Trading [Investor]

Page: 7. Emissions Methodology

7.1

Please provide your base year and base year emissions (Scopes 1 and 2)

Base year	Scope 1 Base year emissions (metric tonnes CO2e)	Scope 2 Base year emissions (metric tonnes CO2e)
Fri 01 Jan 2010 - Fri 31 Dec 2010	132000000	

7.2

Please give the name of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

Please select the published methodologies that you use

Other

7.2a

If you have selected "Other", please provide details below

U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)

7.3

Please give the source for the global warming potentials you have used

Gas	Reference
CO2	Other: U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
CH4	Other: U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
N2O	Other: U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
SF6	Other: U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)

7.4

Please give the emissions factors you have applied and their origin; alternatively, please attach an Excel spreadsheet with this data

Fuel/Material/Energy	Emission Factor	Unit	Reference
Natural gas	53.02	Other: kg CO2/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Natural gas		Other: kg CH4/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Natural gas		Other: kg N2O/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Distillate fuel oil No 2	73.96	Other: kg CO2/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Other: Petroleum (including Distillate fuel Oil No. 2)		Other: kg CH4/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)

Fuel/Material/Energy	Emission Factor	Unit	Reference
Other: Petroleum (including Distillate fuel Oil No. 2)		Other: kg N2O/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Bituminous coal	93.40	Other: kg CO2/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Sub bituminous coal	97.02	Other: kg CO2/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Other: Coal (Including Bituminous and Sub Bituminous)		Other: kg CH4/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Other: (Including Bituminous and Sub Bituminous)		Other: kg N2O/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Other: Wood and Wood Residuals	93.80	Other: kg CO2/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Other: Agricultural Byproducts	118.17	Other: kg CO2/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Other: Biomass (solid, including Wood and Wood Residuals and Agricultural Byproducts)		Other: kg CH4/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)
Other: Biomass (solid, including Wood and Wood Residuals and Agricultural Byproducts)		Other: kg N2O/mmBtu	U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)

Further Information

Southern Company uses continuous emissions monitors (CEMs) to measure CO₂ emissions from many of its electric generating units as required by the Acid Rain Program and uses the CH₄ (methane) and N₂O (nitrous oxide) emission factors listed in question 7.4 to calculate these other greenhouse gas emissions. However, on the units that do not have CEMs, Southern Company uses the CO₂, CH₄, and N₂O emission factors listed above as specified in the U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98) to calculate greenhouse gas emissions. The following emission factors (all of which come from U.S. EPA Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98)) have more than 2 decimal places therefore they are not accepted in the text boxes provided for question 7.4:

- Natural Gas: Emission factor=0.001 kg CH₄/mmBtu
- Natural Gas: Emission factor=0.0001 kg N₂O/mmBtu
- Petroleum (including Distillate Fuel Oil No. 2)=0.003 kg CH₄/mmBtu
- Petroleum (including Distillate Fuel Oil No. 2)=0.0006 kg N₂O/mmBtu
- Coal (including Bituminous and Sub Bituminous)=0.011 kg CH₄/mmBtu
- Coal (including Bituminous and Sub Bituminous)=0.0016 kg N₂O/mmBtu
- Biomass (solid, including Wood and Wood Waste and Agricultural Byproducts)=0.032 kg CH₄/mmBtu
- Biomass (solid, including Wood and Wood Waste and Agricultural Byproducts)=0.0042 kg N₂O/mmBtu

8.1

Please select the boundary you are using for your Scope 1 and 2 greenhouse gas inventory

Financial control

8.2a

Please provide your gross global Scope 1 emissions figure in metric tonnes CO2e

132000000

8.2b

Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e - Part 1 breakdown

Boundary	Gross global Scope 1 emissions (metric tonnes CO2e)	Comment
----------	---	---------

8.2c

Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e - Part 1 Total

Gross global Scope 1 emissions (metric tonnes CO2e) - Total Part 1	Comment
--	---------

8.2d

Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e - Part 2

Gross global Scope 1 emissions (metric tonnes CO2e) - Other operationally controlled entities, activities or facilities	Comment
---	---------

8.3a

Please provide your gross global Scope 2 emissions figure in metric tonnes CO2e

8.3b

Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e - Part 1 breakdown

Boundary	Gross global Scope 2 emissions (metric tonnes CO2e)	Comment
----------	---	---------

8.3c

Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e - Part 1 Total

Gross global Scope 2 emissions (metric tonnes CO2e) - Total Part 1	Comment
--	---------

8.3d

Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e - Part 2

Gross global Scope 2 emissions (metric tonnes CO2e) - Other operationally controlled entities, activities or facilities	Comment
---	---------

8.4

Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions which are not included in your disclosure?

8.4a

Please complete the table

Reporting Entity	Source	Scope	Explain why the source is excluded
------------------	--------	-------	------------------------------------

8.4

Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions which are not included in your disclosure?

Yes

8.4a

Please complete the table

Source	Scope	Explain why the source is excluded
All Scope 2 Sources	Scope 2	Southern Company does not measure its scope 2 emissions.
Sources at facilities that emit less than 25,000 metric tons of CO ₂ e	Scope 1	Southern Company does not track emissions from sources that do not meet the reporting threshold in the U.S. EPA's Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98).

8.5

Please estimate the level of uncertainty of the total gross global Scope 1 and Scope 2 figures that you have supplied and specify the sources of uncertainty in your data gathering, handling, and calculations

Scope	Uncertainty Range	Main sources of uncertainty	Please expand on the uncertainty in your data
Scope 1	Less than or equal to 2%	Metering/ Measurement Constraints	The majority of Southern Company's Scope 1 emissions are measured with continuous emissions monitors according to EPA's 40 CFR 75 specifications. However, locations of the flow measurement monitors in some power plant ducts can impact emission monitoring accuracy by indicating higher than actual emissions.

8.6

Please indicate the verification/assurance status that applies to your Scope 1 emissions

Not verified or assured

8.6a

Please indicate the proportion of your Scope 1 emissions that are verified/assured

8.6b

Please provide further details of the verification/assurance undertaken, and attach the relevant statements

Type of verification or assurance	Relevant standard	Relevant statement attached
-----------------------------------	-------------------	-----------------------------

8.7

Please indicate the verification/assurance status that applies to your Scope 2 emissions

No emissions data provided

8.7a

Please indicate the proportion of your Scope 2 emissions that are verified/assured

8.7b

Please provide further details of the verification/assurance undertaken, and attach the relevant statements

Type of verification or assurance	Relevant standard	Relevant statement attached
-----------------------------------	-------------------	-----------------------------

8.8

Are carbon dioxide emissions from the combustion of biologically sequestered carbon (i.e. carbon dioxide emissions from burning biomass/biofuels) relevant to your company?

Yes

8.8a

Please provide the emissions in metric tonnes CO_{2e}

4000

Further Information

Southern Company does not measure its Scope 2 emissions because the electricity purchased by its Operating Companies is done so through the Pool as described below.

Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company and Southern Power Company (collectively the Operating Companies) function as an integrated system through adherence to the Southern Company System Intercompany Interchange Contract (IIC), an agreement on file with the Federal Energy Regulatory Commission (FERC). Southern Power Company is under the IIC even though it is Southern Company's only wholesale generation subsidiary. Southern Power Company has communication and information access restrictions that the retail Operating Companies do not as part of the Separation Protocol, but it shares the same cost responsibilities (Peak Period Load Ration) for system purchases as the retail Operating Companies. (The Separation Protocol was developed due to a FERC requirement that there must be a clear separation of Southern Power functions from the other Operating Companies' functions including restrictions on information sharing and separation of personnel dedicated to Southern Power Company). Southern Company Services, Inc. (SCS) acts as agent for the Operating Companies in the administration of the IIC. Southern Company does not measure its Scope 2 emissions because the electricity purchased by its Operating Companies is done so through the Pool. The Pool refers to the combined resources and obligations of the Operating Companies.

The IIC provides a framework whereby the generating resources of the Operating Companies are operated in a coordinated and integrated fashion to economically serve their aggregate firm obligations, as well as to engage in shorter term transactions in the wholesale markets. Using traditional concepts of economic dispatch, the Pool deploys available generation to satisfy the aggregate obligations of the system at any given time in a reliable and economic fashion.

There are two primary reasons for the Pool to seek purchase opportunities: (1) economics and (2) reliability. The Pool will pursue purchase opportunities from the wholesale markets if such purchases are expected to be more economical than system resources (again, subject to operational constraints and system reliability). In the event the Pool experiences reliability challenges, then the Pool may seek purchases in response to such operating conditions. The cost of an opportunity purchase is a negotiated price. Indeed, when the Pool enters into an opportunity purchase with a market participant, the detailed information about the generating resource that actually supplies the energy (i.e., variable operation and maintenance, fuel handling, emissions costs) is unknown to the Pool. Therefore, Southern Company does not track the emissions associated with its purchased electricity.

9.1

Do you have Scope 1 emissions sources in more than one country or region (if covered by emissions regulation at a regional level)?

No

9.1a

Please complete the table below

Country	Scope 1 metric tonnes CO ₂ e
---------	---

9.2

Please indicate which other Scope 1 emissions breakdowns you are able to provide (tick all that apply)

By business division
By GHG type

9.2a

Please break down your total gross global Scope 1 emissions by business division

Business Division	Scope 1 metric tonnes CO2e
Alabama Power Company	45600000
Georgia Power Company	51000000
Mississippi Power Company	12810000
Gulf Power Company	9840000
Southern Power Company	8650000
Southern Electric Generating Company	4000000
Southern Company Transmission	100000

9.2b

Please break down your total gross global Scope 1 emissions by facility

Facility	Scope 1 metric tonnes CO2e
----------	----------------------------

9.2c

Please break down your total gross global Scope 1 emissions by GHG type

GHG type	Scope 1 metric tonnes CO2e
CO2	131000000
CH4	300000
N2O	600000
SF6	100000

9.2d

Please break down your total gross global Scope 1 emissions by activity

Activity	Scope 1 metric tonnes CO2e
----------	----------------------------

Page: 10. Scope 2 Emissions Breakdown - (1 Jan 2010 - 31 Dec 2010)

10.1

Do you have Scope 2 emissions sources in more than one country or region (if covered by emissions regulation at a regional level)?

No

10.1a

Please complete the table below

Country	Scope 2 metric tonnes CO2e
---------	----------------------------

10.2

Please indicate which other Scope 2 emissions breakdowns you are able to provide (tick all that apply)

10.2a

Please break down your total gross global Scope 2 emissions by business division

Business division	Scope 2 metric tonnes CO2e
-------------------	----------------------------

10.2b

Please break down your total gross global Scope 2 emissions by facility

Facility	Scope 2 metric tonnes CO2e
----------	----------------------------

10.2c

Please break down your total gross global Scope 2 emissions by activity

Activity	Scope 2 metric tonnes CO2e
----------	----------------------------

Further Information

Southern Company does not measure its Scope 2 emissions because the electricity purchased by its Operating Companies is done so through the Pool as described below.

Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company and Southern Power Company (collectively the Operating Companies) function as an integrated system through adherence to the Southern Company System Intercompany Interchange Contract (IIC), an agreement on file with the Federal Energy Regulatory Commission (FERC). Southern Power Company is under the IIC even though it is Southern Company's only wholesale generation subsidiary. Southern Power Company has communication and information access restrictions that the retail Operating Companies do not as part of the Separation Protocol, but it shares the same cost responsibilities (Peak Period Load Ration) for system purchases as the retail Operating Companies. (The Separation Protocol was developed due to a FERC requirement that there must be a clear separation of Southern Power functions from the other Operating Companies' functions including restrictions on information sharing and separation of personnel dedicated to Southern Power Company). Southern Company Services, Inc. (SCS) acts as agent for the Operating Companies in the administration of the IIC. Southern Company does not measure its Scope 2 emissions because the electricity purchased by its Operating Companies is done so through the Pool. The Pool refers to the combined resources and obligations of the Operating Companies.

The IIC provides a framework whereby the generating resources of the Operating Companies are operated in a coordinated and integrated fashion to economically

serve their aggregate firm obligations, as well as to engage in shorter term transactions in the wholesale markets. Using traditional concepts of economic dispatch, the Pool deploys available generation to satisfy the aggregate obligations of the system at any given time in a reliable and economic fashion.

There are two primary reasons for the Pool to seek purchase opportunities: (1) economics and (2) reliability. The Pool will pursue purchase opportunities from the wholesale markets if such purchases are expected to be more economical than system resources (again, subject to operational constraints and system reliability). In the event the Pool experiences reliability challenges, then the Pool may seek purchases in response to such operating conditions. The cost of an opportunity purchase is a negotiated price. Indeed, when the Pool enters into an opportunity purchase with a market participant, the detailed information about the generating resource that actually supplies the energy (i.e., variable operation and maintenance, fuel handling, emissions costs) is unknown to the Pool. Therefore, Southern Company does not track the emissions associated with its purchased electricity.

Page: 11. Emissions Scope 2 Contractual

11.1

Do you consider that the grid average factors used to report Scope 2 emissions in Question 8.3 reflect the contractual arrangements you have with electricity suppliers?

11.1a

You may report a total contractual Scope 2 figure in response to this question. Please provide your total global contractual Scope 2 GHG emissions figure in metric tonnes CO₂e

11.1b

Explain the basis of the alternative figure (see guidance)

11.2

Has your organization retired any certificates, e.g. Renewable Energy Certificates, associated with zero or low carbon electricity within the reporting year or has this been done on your behalf?

No

11.2a

Please provide details including the number and type of certificates

Type of certificate	Number of certificates	Comments
---------------------	------------------------	----------

Page: 12. Energy

12.1

What percentage of your total operational spend in the reporting year was on energy?

More than 50% but less than or equal to 55%

12.2

Please state how much fuel, electricity, heat, steam, and cooling in MWh your organization has consumed during the reporting year

Energy type	MWh
Fuel	198752810
Electricity	273325.94
Heat	

Energy type	MWh
Steam	
Cooling	

12.3

Please complete the table by breaking down the total "Fuel" figure entered above by fuel type

Fuels	MWh
Bituminous coal	88821086
Sub bituminous coal	24744340
Natural gas	50096248
Distillate fuel oil No 2	10921
Wood or wood waste	538
Other: Nuclear, Hydro, and Other Renewables,	35079677

13.1

How do your absolute emissions (Scope 1 and 2 combined) for the reporting year compare to the previous year?

Increased

13.1a

Please complete the table

Reason	Emissions value (percentage)	Direction of change	Comment
Change in output	9.09	Increase	Southern Company had higher greenhouse gas emissions in 2010 than in 2009 due to an increase in total energy sales. Changes in retail energy sales are comprised of changes in electricity usage by customers, changes in weather, and changes in the number of customers. Retail energy sales increased 11.6 billion KWHs in 2010. This increase was primarily the result of colder weather in the first and fourth quarters 2010 and warmer weather in the second and third quarters 2010, increased industrial KWH sales, and customer growth of 0.3%. Increased demand in the primary metals, chemicals, and transportations sectors were the main contributors to the increase in industrial KWH sales.

13.2

Please describe your gross combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per unit currency total revenue

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Explanation
0.76	metric tonnes CO2e	unit total revenue	1.78	Decrease	This emissions intensity figure is lower for 2010 than for 2009 because Southern Company had an 11.1% increase in electric operating revenues in 2010.

13.3

Please describe your gross combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per full time equivalent (FTE) employee

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Explanation
520523	metric tonnes CO2e	FTE Employee	9.86	Increase	This emissions intensity figure is higher for 2010 than for 2009 because Southern Company had an increase of emissions for 2010 and a reduced number of full time employees.

13.4

Please provide an additional intensity (normalized) metric that is appropriate to your business operations

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Explanation
67	metric tonnes CO2e	Other: MWhs generated	4	Increase	This emissions intensity figure is higher for 2010 than for 2009 because Southern Company had an increase of emissions and generated more MWhs in 2010.

Page: 14. Emissions Trading

14.1

Do you participate in any emission trading schemes?

No, and we do not currently anticipate doing so in the next two years

14.1a

Please complete the following table for each of the emission trading schemes in which you participate

Scheme name	Period for which data is supplied	Allowances allocated	Allowances purchased	Verified emissions in metric tonnes CO2e	Details of ownership
-------------	-----------------------------------	----------------------	----------------------	--	----------------------

14.1b

What is your strategy for complying with the schemes in which you participate or anticipate participating?

14.2

Has your company originated any project-based carbon credits or purchased any within the reporting period?

No

14.2a

Please complete the following table

Credit origination or credit purchase	Project type	Project identification	Verified to which standard	Number of credits (metric tonnes of CO2e)	Number of credits (metric tonnes CO2e): Risk adjusted volume	Credits retired	Purpose e.g. compliance
---------------------------------------	--------------	------------------------	----------------------------	---	--	-----------------	-------------------------

Further Information

Southern Company does not participate in any greenhouse gas emission trading schemes, but the Company actively participated in the mature emissions trading markets in the United States for both sulfur dioxide and nitrogen oxide under provisions of the Clean Air Act.

15.1

Please provide data on sources of Scope 3 emissions that are relevant to your organization

Sources of Scope 3 emissions	metric tonnes CO2e	Methodology	If you cannot provide a figure for emissions, please describe them
------------------------------	--------------------	-------------	--

15.2

Please indicate the verification/assurance status that applies to your Scope 3 emissions

No emissions data provided

15.2a

Please indicate the proportion of your Scope 3 emissions that are verified/assured

15.2b

Please provide further details of the verification/assurance undertaken, and attach the relevant statements

Type of verification or assurance	Relevant standard	Relevant statement attached
-----------------------------------	-------------------	-----------------------------

15.3

How do your absolute Scope 3 emissions for the reporting year compare to the previous year?

We don't have any emissions data

15.3a

Please complete the table

Reason	Emissions value (percentage)	Direction of Change	Comment
--------	------------------------------	---------------------	---------

Module: Electric utilities

Page: 2011-Investor-Electrical 1 Reporting Years

EU0.1

Reference dates

Please enter the dates for the periods for which you will be providing data. The years given as column headings in subsequent tables correspond to the “year ending” dates selected below. It is requested that you report emissions for: (i) the current reporting year; (ii) one other year of historical data (i.e. before the current reporting year); and, (iii) one year of forecasted data (beyond 2015 if possible).

Year ending	Date range
2010	Fri 01 Jan 2010 - Fri 31 Dec 2010
2008	Tue 01 Jan 2008 - Wed 31 Dec 2008
2013	Tue 01 Jan 2013 - Tue 31 Dec 2013

Page: 2011-Investor-Electrical 2 GlobalTotalByYear

EU1.1

In each column, please give a total figure for all the countries for which you will be providing data for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emission intensity (metric tonnes CO2e/MWh)
2008	42608	199535	141200000	0.71
2010	42964	197982	131900000	0.67
2013	45816	206330	128980000	0.63

Page: 2011-Investor-Electrical 2 - EnergyFuelSelection - United States of America

EU2.1

Please select the energy sources/fuels that you use to generate electricity in this country

Coal - Hard
 Oil & gas (excluding CCGT)
 CCGT
 Nuclear
 Hydro
 Other renewables
 Other

Coal - Hard

Please complete the following table for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emission intensity (metric tonnes CO2e/MWh)
2008	20455	133234	127300000	0.96
2010	20455	113565	111800000	0.98

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emission intensity (metric tonnes CO2e/MWh)
2013	19967	111600	106900000	0.96

Lignite

Please complete the following table for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emission intensity (metric tonnes CO2e/MWh)
-------------	-------------------------	------------------	---	---

Oil & gas (excluding CCGT)

Please complete the following table for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emissions intensity (metric tonnes CO2e/MWh)
2008	6036	3087	1400000	0.45
2010	6361	2293	1700000	0.74
2013	7077	1200	880000	0.73

CCGT

Please complete the following table for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emissions intensity (metric tonnes CO2e/MWh)
2008	9214	27670	11000000	0.40
2010	9214	44110	16800000	0.38
2013	11736	54400	20100000	0.37

Nuclear

Please complete the following table for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)
2008	3680	29172
2010	3680	29096
2013	3680	30000

Waste

Please complete the following table for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emissions intensity (metric tonnes CO2e/MWh)
-------------	-------------------------	------------------	---	--

Hydro

Please complete the following table for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)
2008	2758	3770
2010	2756	5974
2013	2758	5600

Other renewables

Please complete the following table for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)
2008		
2010	30	3
2013	30	80

Other

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emissions intensity (metric tonnes CO2e/MWh)
2008	465	2602	1500000	0.58
2010	468	2941	1600000	0.54
2013	468	2660	1100000	0.41

Solid biomass

Please complete for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emission intensity(metric tonnes of CO2e/MWh)
2008				
2010				
2013	100	790	0	0

Total thermal including solid biomass

Please complete for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emission intensity (metric tonnes CO2e/MWh)
2008	39850	195765	141200000	0.72
2010	40178	192005	131900000	0.69
2013	43028	200650	128980000	0.64

Total figures for this country

Please enter total figures for this country for the "year ending" periods that you selected in answer to EU0.1

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes in CO2e)	Emission intensity (metric tonnes CO2e/MWh)
2008	42608	199535	141200000	0.71
2010	42964	197982	131900000	0.67
2013	45816	206330	128980000	0.63

EU3.1

In certain countries, e.g. Italy, the UK, the USA, electricity suppliers are required by regulation to incorporate a certain amount of renewable electricity in their energy mix. Is your company subject to such regulatory requirements?

No

EU3.1a

Please provide the scheme name, the regulatory obligation in terms of the percentage of renewable electricity sourced (both current and future obligations) and give your position in relation to meeting the required percentages

Scheme name	Current % obligation	Future % obligation	Date of future obligation	Position in relation to meeting obligations
-------------	----------------------	---------------------	---------------------------	---

EU4.1

Please give the contribution of renewable electricity to your company's EBITDA (Earnings Before Interest, Tax, Depreciation and Amortisation) in the current reporting year in either monetary terms or as a percentage

Please give:	Monetary figure	%	Comment
Renewable electricity's contribution to EBITDA	699147	0.01%	

EU4.2

Please give the projected contribution of renewable electricity to your company's EBITDA at a given point in the future in either monetary terms or as a percentage

Please give:	Monetary figure	%	Year ending	Comment
Renewable electricity's contribution to EBITDA	6277142	0.11%	2011	

EU4.3

Please give capital expenditure (capex) planned for the development of renewable electricity capacity in monetary terms and as a percentage of total capex planned for power generation in the current capex plan

Please give:	Monetary figure	%	End year of capex plan	Comment
Capex planned for renewable electricity development	569000000	4.1%	2013	Represents 2011 - 2013 Capital budget. Includes placeholders for future renewable development

Module: Sign Off

Page: Sign Off

Please enter the name of the individual that has signed off (approved) the response and their job title

Chris M. Hobson, Chief Environmental Officer and Senior Vice President, Research and Environmental Affairs