

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In Re:)
Georgia Power Company's 2019 Integrated)
Resource Plan and Application for)
Certification of Capacity from Plant Scherer)
Unit 3 and Plant Goat Rock Units 9-21,) **Docket No. 42310**
Application for Decertification of Plant)
Hammond Units 1-4, Plant McIntosh Unit 1,)
Plant Estatoah Unit 1, Plant Langdale)
Units 5-6 and Plant Riverview Units 1-2)

And

In Re:)
Georgia Power Company's 2019 Application) **Docket No. 42311**
for the Certification, Decertification, and)
Amended Demand Side Management Plan)

**APPLICATION FOR LEAVE TO INTERVENE OF
SOUTHERN RENEWABLE ENERGY ASSOCIATION**

COMES NOW, the Southern Renewable Energy Association ("SREA"), pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Commission Rule 515-2-1-.06, and hereby files this Application for Leave to Intervene ("Application") in the above-referenced docket. In support hereof, SREA respectfully shows as follows:

1.

On January 31, 2019, Georgia Power Company ("Georgia Power") filed for approval of its 2019 Integrated Resource Plan ("IRP") including a request to decertify certain generating units, as well as for certification of certain demand side management programs.

Pursuant to that filing, SREA files this application for leave to intervene and participate in this docket. The application is timely filed.

2.

SREA is a regional trade association that works to promote the responsible development and use of utility-scale wind energy, energy storage, solar energy and transmission throughout the South. Georgia is one of eleven states in which SREA works. SREA believes that the Georgia Power service territory market for utility-scale wind energy, energy storage, solar energy and transmission, is large enough to incorporate significantly greater amounts of these resources into its IRP, than the IRP has included. SREA functions as a nonprofit trade association consisting of individuals, businesses and other entities that promote the economic and environmental benefits of utility-scale wind energy, energy storage, solar energy and transmission in Georgia. SREA members have a vital interest in the pending dockets inasmuch as its members develop and deploy facilities to generate and produce energy. The Commission's actions in this docket will affect development, deployment, or use of the various energy resources in the region and thus will affect the investment decisions made by members of SREA. Moreover, SREA members want to ensure that they can provide low cost energy resources in Georgia to reduce prices for consumers, and economic development for the state. As a result, SREA has substantial interests in the outcome of this proceeding and desires to intervene in order to protect those interests.

3.

SREA's rights and interests cannot be adequately represented by any other party to the above-styled docket. Specifically, SREA's expertise and interest in wind energy, energy

storage and transmission are unmatched in this docket. Its participation in this matter will not unduly delay these proceedings or prejudice any other party.

4.

SREA respectfully requests that it be granted leave to intervene and participate fully as a party in these proceedings, including the right to present testimony and exhibits, cross-examine witnesses, and file briefs. SREA intends to participate in the docket and at this point wants to ensure that the Georgia Power IRP accurately reflects the pricing of various energy resources in its modeling scenarios, the benefits to Georgia Power ratepayers of new generation and that the Company adequately considers renewable energy options. SREA has participated in IRP proceedings for the Arkansas Electric Cooperative Company, Big Rivers Cooperative Corporation (Kentucky), Cleco Corporation (Louisiana), Entergy Arkansas, Entergy Louisiana, Georgia Power Company, Kentucky Power, Southwestern Electric Power Company (Louisiana) and the Tennessee Valley Authority. Our expertise regarding utility-scale wind energy, energy storage, solar energy, transmission and utility resource planning would be valuable in this IRP proceeding.

5.

SREA respectfully requests that the following people be included on the service list in this docket and that all communications regarding this docket be directed to them:

Bruce Burcat, Esq
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Simon Mahan
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WHEREFORE, SREA respectfully requests that the Commission grant its application for leave to intervene and admit it as a full party of record in these proceedings with all right attendant thereto.

Respectfully submitted this 19th day of February, 2019



Bruce H. Burcat
Attorney for SREA
Mid-Atlantic Renewable Energy Coalition
29 N. State St. Ste 300
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VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly authorized to administer oaths, Bruce H. Burcat, who, after being duly sworn, deposes and states that he is the attorney for the Southern Renewable Energy Association; that he is authorized to offer this affidavit; that he is familiar with the contents of the foregoing Application for Leave to Intervene; and that the facts contained therein are true and correct to the best of his information and belief.

This 18th day of February, 2019.



Bruce H. Burcat

Sworn and subscribed before me

this 18th day of February, 2019.


COMOP
08-11-2019



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CERTIFICATE OF SERVICE

I do hereby certify that I have this 19th day of February, 2019, served the following parties with the foregoing **APPLICATION FOR LEAVE TO INTERVENE OF THE SOUTHERN RENEWABLE ENERGY ASSOCIATION**, via hand delivery or US mail as follows:

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