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## **Georgia Public Service Commission**

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July 17, 2020

### **PUBLIC DISCLOSURE**

Kelley Balkcom  
Director, Regulatory Affairs  
Georgia Power Company  
Regulatory Affairs Bin 10230  
241 Ralph McGill Blvd., N.E.  
Atlanta, Georgia 30308-3374

**RE: Docket No. 36989 / Georgia Power Company's 2013 Rate Case**

**Data Requests from Commission Staff (STF-ASR-63)**

Dear Ms. Balkcom:

Enclosed herewith, please find Commission Staff Data Request **STF-ASR-63**. Georgia Power's initial responses to this Data Request package are requested as soon as possible, but not later than **August 17, 2020**.

If you have any questions concerning this transmittal, please contact Rob Trokey at 404-656-4549.

Sincerely,

Rob Trokey  
Director  
Electric Unit

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of )  
 ) Docket No. 36989  
Georgia Power Company's )  
2013 Rate Case )

STAFF'S SIXTY-THIRD SET OF DATA REQUESTS TO  
GEORGIA POWER COMPANY

TO: Ms. Kelley Balkcom  
Director, Regulatory Affairs  
Georgia Power Company  
Regulatory Affairs Bin 10230  
241 Ralph McGill Blvd., N.E.  
Atlanta, Georgia 30308-3374

COMES NOW the Staff of the Georgia Public Service Commission (“Commission”) and, pursuant to the authority vested in it by the Commission pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, “data requests”), **to be answered under oath** by designated representatives or agents of Georgia Power Company. Staff requests that a complete set of the responses and supporting documents be filed with the Commission’s Executive Secretary in the manner set forth in Utility Rule 515-2-.04(4). Staff requests that an original and five (5) copies be filed with the Executive Secretary of the Commission. **Accompanied therewith shall be an electronic version of the filing, which shall be made on CD ROM containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.** As contemplated by law, responses to these Data Requests are expected from Georgia Power Company on or before **August 17, 2020**.

## DEFINITIONS

As may be used in this document:

1. “The Company,” “Georgia Power” or “The Utility” means Georgia Power Company and its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of said Company.

2. The term “you” and “your” refer to “the Company.”

3. The term “person” means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

4. The term “document” or “documentation” shall have the broadest possible meaning under applicable law. “Document” or “documentation” means every writing or record of every type and description that is in the possession, custody or control of the Company including, but not limited to, correspondence, memoranda, e-mails, drafts, workpapers, summaries, stenographic or handwritten notes, studies, notices, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term “document” or “documentation” further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, chart projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

5. The term “referring or relating to” means consisting of containing mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

6. “And” and “or” as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would not otherwise be brought within their scope.

7. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

8. “Identify” or “identifying” or “identification” when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.

9. “Identify” or “identifying” or “identification” when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duce tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document; the title or label of the document;
- c) the Bates number or other identifier used to number the document for use in litigation; the identity of the originator;
- d) the identity of each person to whom it was sent;
- e) the identity of each person to whom a copy or copies were sent;
- f) a summary of the contents of the document;
- g) the name and last known address of each person who presently has possession, custody or control of the document;
- h) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

11. “Identify”, “identifying” or “identity” when used in reference to a communication should be read to include information regarding the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

## INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
  - a. the privilege asserted and its basis.
  - b. the nature of the information withheld;
  - c. the subject matter of the document, except to the extent that you claim it is privileged.
2. **The answers provided should first restate the question asked and also provide the name of the Company employee(s) or agents responsible for compiling and providing the information contained in each answer.**
3. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
4. If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
5. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.
6. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
  - a) the privilege asserted and its basis.
  - b) a log should be provided identifying starting and ending bates numbers.
  - c) the nature of the information withheld;
  - d) the subject matter of the document, except to the extent that you claim it is privileged.
  - e) a description of the document to which the privilege applies.

**PUBLIC DISCLOSURE**

**STF-ASR-63-1** Coal Combustion Residuals (CCR). Refer to the response to STF-ASR-58-4, specifically to the trade secret Excel file provided with that response - [2020-07-13 Attachment STF-ASR-58-4 TRADE SECRET.xlsx] tab "CAP Attachment STF-ASR-58-4 TS":

- a. Explain what a [REDACTED] is, its purpose and how it is used at Bowen. Please include a picture of the Bowen [REDACTED] with the description.
- b. Explain the \$ [REDACTED] Bowen UNITS 1-4 [REDACTED]. Is this for a new [REDACTED] for all four Bowen units? Please provide the related journal entries and journal entry support.
- c. Explain the following Bowen [REDACTED] entries, and indicate whether there was a retirement for Units 1 and 2, and if not why amounts are being removed from account 101 for Units 1 and 2. Also explain in detail why amounts are being added for Units 3 and 4, and explain how those amounts were determined. Please provide the related journal entries and journal entry support:

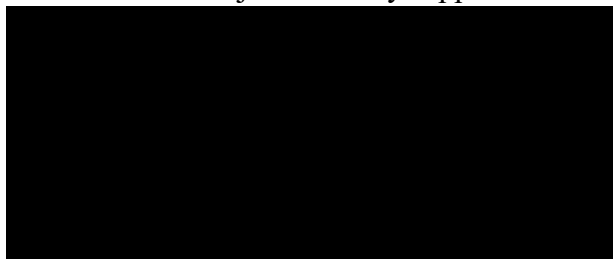


- d. Explain why the [REDACTED] (Units 1-4 [REDACTED]), [REDACTED] (Unit 3 [REDACTED]) and [REDACTED] (Unit 4 [REDACTED]) capital expenditures were necessary.
- e. Explain the following Wansley [REDACTED] entries, indicate whether there was a retirement at Wansley Common that resulted in the [REDACTED] being removed, whether there was a reallocation from Wansley Common to Wansley units 1 and 2. Explain why the [REDACTED] amounts are being added to Wansley Unit 1 and to Wansley Unit 2, and

**Docket No. 36989**  
**Georgia Power Company's 2019 Annual Surveillance Report**  
**STF-ASR Data Request Set Number 63**

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how those amounts were determined. Please also provide the related journal entries and journal entry support:



**STF-ASR-63-2** Distribution and Vegetation Management and Right of Way Management. Refer to the response to STF-ASR-62-7.

- a. How many miles of Distribution Vegetation Management backlog were carried from 2018 into 2019?
- b. How many miles of Distribution Vegetation were cleared in 2019?
- c. How many miles of Distribution Vegetation Management were cleared in 2019 that relate to the 2018 backlog that was carried from 2018 into 2019?
- d. What reduction, if any, occurred in the Distribution Vegetation Management backlog in 2019?

**STF-ASR-63-3** Please refer to STF-ASR-62-8. Please allocate the \$76.9 million between Plants Bowen, Wansley, Yates, Tallulah Falls, and Tugalo Hydro. Provide a brief description of the expenditures and their purpose (safety concerns, maintain reliability, repair aging equipment or other).

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:

Georgia Power Company's  
2013 Rate Case

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Docket No. 36989

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff's Data Request STF-ASR-63** in the above-referenced docket was filed with the Commission's Executive Secretary, an electronic copy of same was served upon all parties and persons listed below via electronic mail, or unless otherwise indicated, as follows:

Reece McAlister\*  
Executive Secretary  
Georgia Public Service Comm.  
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Kyle Leach  
VP Pricing Plan & Regulatory Affairs  
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So certified, this 17th day of July 2020.

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Rob Trokey  
Director  
Electric Unit