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August 5, 2021

Mr. Reece McAlister, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

VIA ELECTRONIC DELIVERY

Re: **Georgia Power Company's Application to Adjust Rates to Include Certain Plant Vogtle Unit 3 and Common Costs**
Verified Application of Interstate Gas Supply, Inc. for Leave to Intervene
Docket No.: 43838

Dear Mr. McAlister:

We have enclosed for filing on behalf of Interstate Gas Supply, Inc. ("IGS Energy") an original and fifteen (15) copies for the following document:

Verified Application of Interstate Gas Supply, Inc. for Leave to Intervene

for the above-referenced Docket.

Please return to us the extra copy showing the date of filing. If you have any questions concerning this application, please feel free to contact us.

Sincerely,

William Bradley Carver, Sr.
Joel L. McKie
Attorneys for Interstate Gas Supply, Inc.

WBC/JLM/anq

ATLANTA, GA

ALABAMA | GEORGIA | FLORIDA | NEW JERSEY | NORTH CAROLINA | SOUTH CAROLINA | TENNESSEE

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:

**GEORGIA POWER COMPANY'S
APPLICATION TO ADJUST
RATES TO INCLUDE CERTAIN
PLANT VOGTLE UNIT 3 AND
COMMON COSTS**

Docket No.: 43838

**VERIFIED APPLICATION OF INTERSTATE GAS SUPPLY, INC.
FOR LEAVE TO INTERVENE**

COMES NOW, Interstate Gas Supply, Inc. (“IGS Energy”), pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59, § 515-2-1-.06 of the Utility Rules of the Georgia Public Service Commission (“Commission”), and the Procedural and Scheduling Order for Docket Number 43838, and hereby files its *Verified Application for Leave to Intervene* in Docket Number 43838. In support of this application, IGS Energy respectfully shows the following:

1.

On May 20, 2021, the Commission approved a Procedural and Scheduling Order for this docket involving Georgia Power Company’s Application to Adjust Rates to include certain Plant Vogtle Unit 3 and common facility costs consistent with Georgia law and prior orders of the Commission. IGS Energy seeks leave to intervene and participate in such proceeding. This application is timely filed.

2.

IGS Energy is an independent retail natural gas and electric supplier based in Dublin, Ohio that operates in over 20 states with over 1,500,000 customers across the country. In the renewable energy context, IGS Energy has developed 295 megawatts of solar projects across the country (165 megawatts for commercial customers and 130 megawatts for residential

customers). Specifically in Georgia, IGS Energy is the parent entity of the Georgia operations of SCANA Energy Marketing, LLC ("SCANA"). SCANA was certificated by the Commission on October 6, 1998 with Interim Certificate No.: GM-0010 in Docket Number 9536-U, to provide natural gas to retail customers within the State of Georgia. IGS Energy also has several solar projects in Georgia developed in Georgia Power's Advanced Solar Initiative ("ASI") and Advanced Solar Initiative Prime ("ASI Prime") programs.

3.

The rights and interests of IGS Energy will be substantially affected by decisions made by the Commission in Docket Number 43838. The retail solar energy market for both residential and commercial customers significantly depends on Georgia Power's wholesale energy cost as well as Georgia Power's avoided energy cost, which this Docket will greatly impact.

4.

While there may be other intervening party applicants in this Docket that represent the renewable energy sector who may have similar interests in this docket, no other party has identical interests in the proceedings in Docket Number 43838 such that these intervenors can adequately represent the rights and interests of IGS Energy.

5.

IGS Energy's participation in the Docket will not unduly delay or prejudice the rights of any party. Specifically, since the Commission has adopted a Procedural and Scheduling Order in Docket Number 43838 which contemplates the participation of intervenors, the Commission will still be able to make its decision on the scheduled date regardless of the involvement of IGS Energy. At this point, the 30 day intervention time period has not yet begun.

6.

IGS Energy is still evaluating the extent in which it will provide direct testimony in this matter. Pursuant to the Procedural and Scheduling Order in Docket Number 43838, IGS Energy will provide more information regarding its intentions to provide direct testimony once those litigation decisions are made.

7.

IGS Energy respectfully requests that it be granted leave to intervene and to participate fully as a party in this Docket with all rights attendant thereto.

8.

All notices, correspondence and copies of orders and materials should be addressed as follows, and the following should be placed upon the official service list in this proceeding.

William Bradley Carver, Sr. Esq.
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WHEREFORE, IGS Energy respectfully requests that the Commission enter an order allowing IGS Energy to become a full party of record in Docket Number 43838.

Respectfully submitted, this 5th day of August 2021.

HALL BOOTH SMITH, P.C.

A handwritten signature in blue ink, appearing to read 'WBC', is written over a horizontal line.

WILLIAM BRADLEY CARVER, SR.

Georgia Bar No. 115529

JOEL L. MCKIE

Georgia Bar No. 585780

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BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

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GEORGIA POWER COMPANY'S
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VERIFICATION OF APPLICATION OF INTERSTATE GAS SUPPLY, INC.
FOR LEAVE TO INTERVENE

William Bradley Carver, Sr., personally appeared before the undersigned Notary Public and stated under oath that he is the Attorney for Interstate Gas Supply, Inc. ("IGS Energy"), that he is authorized by IGS Energy to execute this Verification on its behalf and that on his information and belief the facts alleged in the foregoing *Verified Application for Leave to Intervene* are true and correct to the best of his knowledge.

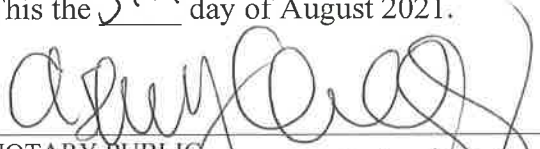


William Bradley Carver, Sr.
Attorney for Interstate Gas Supply, Inc.

NOTARY PUBLIC

I, hereby certify that William Bradley Carver, Sr., has subscribed and sworn before me that the above information is true and correct to the best of his knowledge.

This the 5th day of August 2021.



NOTARY PUBLIC

My Commission Expires: 8/7/21



SEAL

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:

**GEORGIA POWER COMPANY'S
APPLICATION TO ADJUST
RATES TO INCLUDE CERTAIN
PLANT VOGTLE UNIT 3 AND
COMMON COSTS**

Docket No.: 43838

CERTIFICATE OF SERVICE

This is to certify that I have served a copy of the foregoing **VERIFIED APPLICATION OF INTERSTATE GAS SUPPLY, INC. FOR LEAVE TO INTERVENE** by E-mail unless otherwise indicated as shown as follows:

Reece McAlister
Executive Secretary
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This 5th day of August 2021.

HALL BOOTH SMITH, P.C.



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JOEL L. MCKIE

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