# ROBERT B. JACKSON, IV, LLC

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25 July 2022

## VIA EFILE & VIA PRIORITY MAIL

Sallie Tanner, Executive Secretary Georgia Public Service Commission 244 Washington Street, SW Atlanta, Georgia 30334-5701

# RE: SIERRA CLUB NOTICE AND APPLICATION TO INTERVENE 2022 Georgia Power Company Rate Case GA PSC Docket 44280

Ms. Tanner –

Please find enclosed an original and fifteen printed copies of the Sierra Club's Application to Intervene in the above-referenced docket. A compact disc containing the MS Word and pdf versions of the application are also included. The documents were filed electronically using the Georgia PSC's alternative e-file procedures. The certificate of service for this filing is included with the application.

Sincerely,

RMI

Robert Jackson

## BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

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In Re: Georgia Power Company's 2022 Rate Case

Docket No. 44280

#### SIERRA CLUB'S NOTICE OF INTENT TO INTERVENE AND APPLICATION FOR LEAVE TO INTERVENE

COMES NOW, the Sierra Club ("Sierra Club"), by its counsel and pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59, hereby gives notice of its intent to intervene in this proceeding and respectfully petitions the Commission for leave to intervene. In support of this petition, the Sierra Club respectfully states as follows:

[1] Sierra Club is the nation's oldest and largest grassroots environmental organization, with members across the country, including over 10,000 members in Georgia. Sierra Club's mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's resources and ecosystems; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. As part of this mission, Sierra Club works on behalf of its members to help transition the power generation industry away from fossil fuels and towards a clean energy economy. Sierra Club also has a long history of working to reduce pollution from coal-fired power plants, including work to prevent and remediate the contamination caused by toxic coal ash pollution. Thousands of Sierra Club members purchase electricity from Georgia Power. The Sierra Club members and the public at large, who live and recreate in the communities near coal ash waste have substantial interests in the cost and terms of service for purchase of electricity, and as such are greatly affected by the Commission's actions in this docket. As a result, Sierra Club has substantial interests in the outcome of this proceeding and desires to intervene in order to protect those interests.

[2] On June 24, 2022, Georgia Power filed before the Commission its 2022 Rate Case. The Commission approved a procedural and scheduling order for this docket on April 7, 2022. Pursuant to that order, Sierra Club timely files this application for leave to intervene and participate in the above-referenced docket.

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

Robert Jackson, Esq. Robert B. Jackson, IV, LLC 260 Peachtree Street - Suite 2200 Atlanta, Georgia 30303 (404) 313-2039 rbj4law@gmail.com

Isabella Ariza, Esq. Sierra Club 50 F Street NW, 8th Floor Washington, D.C. 20001 (857) 999-6267 isabella.ariza@sierraclub.org

[3] There are presently no other intervenors with sufficiently similar interests that would adequately represent Sierra Club's diverse and unique interests. Sierra Club presently intends to submit direct testimony on the subjects identified above from persons to be determined subsequently. Sierra Club's intervention will not delay the proceedings or prejudice the rights of other parties.

WHEREFORE, Sierra Club requests that the Commission grant its application to intervene in the above-captioned proceeding.

Respectfully submitted this 25<sup>th</sup> day of July 2022.

Rot B. AM

Robert Jackson, Esq. Robert B. Jackson, IV, LLC 260 Peachtree Street – Suite 2200 Atlanta, Georgia 30303 (404) 313-2039 rbj4law@gmail.com

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#### VERIFICATION OF APPICATION FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, Isabella Ariza, Esq. who, after being duly sworn, deposes and says that she is an Associate Attorney for the Sierra Club and that the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of her information and belief.

This <u>25</u> day of July 2022.

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Isabella Ariza, Esq.

Sworn to and subscribed before me, this 25 day of July 2022.

Kimp Mm

Notary Public

My Commission Expires: 4/30/2026

[Affix Seal]



# BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:

Georgia Power Company's 2022 Rate Case

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Docket No. 44280

# **CERTIFICATE OF SERVICE**

I hereby certify that I have served the following parties with the foregoing SIERRA CLUB'S NOTICE

OF INTENT TO INTERVENE AND APPLICATION FOR LEAVE TO INTERVENE, via electronic mail as

follows:

Sallie Tanner Executive Secretary Georgia Public Service Comm. 244 Washington Street, SW Atlanta, GA 30334 stanner@psc.state.ga.us

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This 25<sup>th</sup> day of July 2022.

Rot B. AM

Robert Jackson, Esq. Robert B. Jackson, IV, LLC 260 Peachtree Street – Suite 2200 Atlanta, Georgia 30303 (404) 313-2039 rbj4law@gmail.com