

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:]
Georgia Power Company's] Docket No. 44280
2022 Rate Case]

Joint Application of the Southern Alliance for Clean Energy
And the Southface Energy Institute for Leave to Intervene

COMES NOW, the Southern Alliance for Clean Energy (hereafter "SACE") and the Southface Energy Institute (hereafter "Southface"), pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Commission Rule 515-2-2.06, and hereby file this Joint Application to Intervene (hereafter "Application") in the above-referenced docket. In support hereof, SACE and Southface respectfully show as follows:

1.

On April 7, 2022, the Georgia Public Service Commission filed the Procedural and Scheduling Order for Docket 44280 that directed Georgia Power Company (hereafter "Georgia Power") to file its 2022 rate case by July 1, 2022.

2.

Georgia Power Company filed its rate case June 24, 2022.

3.

SACE is a nonprofit corporation whose purpose is to promote responsible and equitable energy choices to ensure clean, safe, and healthy communities throughout the Southeast. SACE is incorporated in Tennessee and is registered as a nonprofit corporation in Georgia. SACE has an office and staff in Atlanta and operates in Georgia, Tennessee, Florida, North Carolina, and South Carolina. SACE and its members are

interested in promoting greater reliance on clean, low-cost resources to meet the Southeast's energy needs. SACE conducts education programs and research concerning environmental, public health, and economic impacts of energy use and policy, and advocates for energy resource plans and policies that best serve the public health and economic interests of communities in Georgia and throughout the Southeast.

4.

In furtherance of its interests and those of its members, SACE has intervened in numerous proceedings before the Commission since 2003. Among the many Commission proceedings in which SACE has intervened and actively participated are the semi-annual reviews of Plant Vogtle Units 3 and 4 in Docket 29849, Georgia Power's application for approval of its 2010 IRP and certification of DSM programs from the 2010 IRP, Georgia Power's application for decertification of Plant Branch Units 1 and 2 and Plant Mitchell Unit 4C, certification of certain power purchase agreements and approval of its 2011 IRP update, Georgia Power's Advanced Solar Initiative, the Plant Mitchell conversion, the 2011-2012 DSM Working Group, Georgia Power's 2013 IRP and certification of DSM programs from the 2013 IRP, Georgia Power's 2016 IRP and application for the decertification of Plant Mitchell Units 3, 4A and 4B, Plant Kraft Unit 1 CT and Intercession City CT and certification, decertification and amended DSM plan from the 2016 IRP, the 2019 Georgia Power IRP and DSM plans in Dockets 42310 and 42311, and most recently the 2022 IRP and DSM plans in Dockets 44160 and 44161.

5.

SACE has an interest in the 2022 Georgia Power rate case proceedings both on its own behalf and on behalf of its members. Georgia Power is the electric provider of many of its members in Georgia who are subject to the impacts of Georgia Power's rate adjustments and the cost of electricity. SACE and its members' interests in this

proceeding are germane to SACE's purpose of advocating for energy resource plans, policies, and systems that best serve the environment, public health, and economic interests of the communities in Georgia and throughout the Southeast. SACE seeks to intervene in these proceedings to continue to protect its interests and the interests of its members by advocating for energy savings and equitable rates.

6.

Southface is a 501(c)(3) nonprofit organization that for over 40 years has promoted energy, water, and resource efficient workplaces, homes, and communities throughout the Southeast. Southface works with consumers, the construction and development industry, and policymakers to forge market-based solutions for the adoption of equitable clean energy that create jobs and support sustainable communities. Southface has members throughout Georgia.

7.

Southface has extensive expertise in the installation and operation of energy efficiency, distributed energy, and energy management technologies and programs and is one of the leading organizations in the Southeast on how to achieve energy efficiency and clean energy goals for homes, workplaces, and communities. Southface has conducted research and provided education and technical assistance on clean energy technologies and strategies for over 40 years. In addition, Southface has gained unique expertise in Georgia's solar market having previously conducted an annual inventory of jobs created by Georgia's clean energy economy, and working with public, private, and nonprofit entities that have struggled to address market barriers to the deployment of solar power. Southface advises companies, communities, and residential customers in Georgia and across the Southeast on how to cost-effectively reduce and manage their energy costs. Southface brings unique interests and perspectives to these proceedings.

8.

Southface has an interest in the 2022 Georgia Power rate case both on its own behalf and on behalf of its members. Southface and many of its members are Georgia Power customers. Their electricity consumption and the associated costs will be affected by the Commission's actions in this docket. In addition, Southface has worked for decades to promote equitable, clean, and efficient energy solutions and sustainable communities, goals that relate to the energy choices reflected in the plans Georgia Power has presented for approval in these proceedings. Southface intervened and actively participated in the 2019 rate case, Docket 42516. Additionally, Southface intervened in the 2016 IRP and DSM proceedings in Dockets 40161 and 40162, the 2019 IRP and DSM proceedings in Dockets 42310 and 42311, and most recently IRP and DSM proceedings in Dockets 44160 and 44161. For these reasons, Southface has significant interests in the outcome of these proceedings and seeks to intervene to protect those interests.

9.

The interests of Southface and SACE and those of their members are not adequately represented by other parties to this proceeding. Southface and SACE's intervention will not unduly delay the proceeding or prejudice the rights of other parties. If their application is granted, SACE and Southface intend to fully participate in the docket.

10.

SACE and Southface respectfully request that the following persons receive all notices, correspondence, pleadings and copies of orders and other materials in these dockets, and that all communications regarding these dockets be directed to them:

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WHEREFORE, Southface and SACE respectfully request the Commission grant their Joint Application for Leave to Intervene and admit them as full parties of record in this proceeding with all rights attendant thereto.

Respectfully submitted this 28th day of July, 2022.



Robert B. Baker
Attorney for Southface Energy Institute and
the Southern Alliance for Clean Energy

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BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:]
Georgia Power Company's]
2022 Integrated Resource Plan]

Docket No. 44280

Verification of the Joint Application for Leave to Intervene

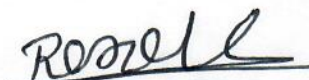
Personally appeared before the undersigned officer, duly authorized to administer oaths in the State of Georgia aforesaid, Robert B. Baker, who, after being duly sworn, deposes and says that he is the attorney for both the Southern Alliance for Clean Energy and the Southface Energy Institute and that the facts contained in the foregoing Joint Application of the Southern Alliance for Clean Energy and Southface Energy Institute for leave to intervene are true and correct to the best of his information and belief.

This 28th day of July, 2022.


Robert B. Baker

Sworn to and subscribed before me

this 28 day of July, 2022.



Notary Public
My Commission Expires:

[SEAL]



CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Joint Application of the Southern Alliance for Clean Energy and Southface Energy Institute for Leave to Intervene** was filed in Docket 44280 with the Georgia Public Service Commission's Executive Secretary by the Commission's eFile system. An electronic copy of same was served upon all parties listed below by electronic mail, unless otherwise indicated, and addressed as follows:

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This 28th day of July, 2022.


Robert B. Baker
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