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August 5, 2022

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, 1st Floor
Atlanta, GA 30334

RE: Georgia Power Company's 2022 Rate Case, Docket No. 44280

Dear Executive Secretary Tanner:

Please find enclosed an electronic version of EVgo's Application for Leave to Intervene for filing in Docket No. 44280.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Vijaykar', written over a horizontal line.

Nikhil Vijaykar
Keyes & Fox LLP
580 California Street, 12th Floor
San Francisco, CA 94104
Tel.: 408-628-3256
E-mail: nvijaykar@keyesfox.com

Counsel to EVgo Services, LLC

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In re: Georgia Power Company's) Docket No. 44280
2022 Rate Case)

EVGO'S APPLICATION FOR LEAVE TO INTERVENE

EVgo Services, LLC (EVgo), by and through its counsel Keyes & Fox LLP, hereby files this application for leave to intervene in the above-captioned proceeding pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Rule 515-2-1-.06 of the Commission’s Rules of Practice and Procedure, and Part II.1 of the April 7, 2022 Procedural and Scheduling Order in Docket No. 44280. In support of this application, EVgo states as follows:

1. EVgo is a corporation organized pursuant to the laws of the State of Delaware with its corporate headquarters located at 11835 W. Olympic Blvd. Suite 900E Los Angeles, CA 90064.
2. EVgo is the nation's largest public fast charging network for electric vehicles. As of the end of the first quarter 2022, with more than 850 charging locations, EVgo's owned and operated charging network serves over 60 metropolitan areas across more than 30 states and approximately 375,000 customer accounts. Founded in 2010, EVgo leads the way on transportation electrification, partnering with automakers; fleet and rideshare operators; retail hosts such as hotels, shopping centers, gas stations and parking lot operators; and other stakeholders to deploy advanced charging technology to expand network availability and make it easier for drivers across the U.S. to enjoy the benefits of driving an electric vehicle (EV). As a charging technology first mover, EVgo works closely with business and government leaders to accelerate the ubiquitous adoption of EVs by providing a

reliable and convenient charging experience close to where drivers live, work and play, whether for a daily commute or a commercial fleet. Fast charging is crucial to enabling electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs, drivers utilizing key transit corridors, as well as fleets, including for car and rideshare applications. EVgo has 48 Direct Current Fast Chargers (DCFC) at 27 Georgia locations currently in operation, including multiple stations in Georgia Power Company's service territory, with plans for expansion.

3. EVgo currently provides fast charging solutions and services directly to drivers and station site hosts in Georgia. As an owner-operator, EVgo partners with site hosts to provide turnkey charging solutions that allow site hosts to provide charging services to drivers without any upfront capital. EVgo manages everything from permitting and installation to maintenance and customer care to provide fast charging for EV drivers at convenient locations. Additionally, EVgo offers a white label product, EVgo eXtend, where EVgo provides the hardware, design, and construction of charging sites, as well as ongoing operations, maintenance and networking, and software integration solutions, while its customers purchase and retain ownership of the charging assets. EVgo therefore has substantial and specific economic interests in the sustainable and scalable growth of EV charging infrastructure within Georgia generally, and within Georgia Power's service territory more specifically.

4. On April 7, 2022, the Commission filed a Procedural and Scheduling Order for Docket 44280 that directed Georgia Power to file its 2022 rate case by July 1, 2022. Georgia Power filed its 2022 rate case on June 24, 2022. That rate case filing includes certain proposed investments in electric vehicle charging infrastructure, certain changes to existing tariffs, and certain new tariffs and pricing options. As a developer, owner, and operator of DC fast charging stations in Georgia with a growing presence in Georgia Power's territory, EVgo has a substantial economic interest in the outcome of this proceeding.
5. More concretely, EVgo is a Georgia Power customer. The Company's rates therefore directly and significantly impact EVgo's business. In particular, the Company's proposed Charge It – Electric Vehicle rider¹ will impact EVgo's ongoing operating costs and plans for expansion in Georgia.
6. Further, Georgia Power's proposed infrastructure and technology investments, including its increased investments in community electric vehicle charging facilities and necessary electric transportation infrastructure upgrades to support customer EV charging,² stand to directly impact the size and scope of EVgo's planned network expansion in Georgia. EVgo has an interest in ensuring that the investments and programs ultimately approved by the Commission in this proceeding are robustly designed to support a competitive and equitable EV charging market.
7. Georgia Power's 2022 rate case proposals therefore bear directly on EVgo's economic interests, and more broadly on its position and market presence within

¹ Docket No. 44280, Direct Testimony of Larry T. Legg on behalf of Georgia Power Company at 16.

² Docket No. 44280, Direct Testimony of Christopher C. Womack on behalf of Georgia Power Company at 10.

this State. As such, EVgo has a direct and substantial interest in the outcome of this proceeding meeting the standards in O.C.G.A. § 46-2-59(e)(2) and 50-13-14(1) and desires to intervene in order to protect those interests. The Commission should therefore grant EVgo leave to intervene in this proceeding.

8. EVgo has not been able to identify any other intervening party or intervening party applications that expresses an interest similar to that of EVgo, and therefore EVgo's unique and particularized interest is not adequately represented by any other party to this proceeding. The Commission should permit EVgo to intervene in this proceeding and should not consolidate EVgo with any party or group of parties, per O.C.G.A. § 50-13-14(1) and § 46-2-59(e)(2).
9. Further, EVgo intends on adhering to the procedural schedule established for this proceeding and therefore its intervention will not unduly prejudice the adjudication of the rights of existing parties. The Commission therefore may permit EVgo to intervene in this proceeding per O.C.G.A. § 50-13-14(2) and § 46-2-59(e)(2).
10. EVgo intends to submit direct testimony in this proceeding on the subjects raised in this application, and reserves the right to address in its testimony any other issue raised by Georgia Power's rate case filing or through discovery during the course of this proceeding.
11. EVgo's national market presence, experience, and expertise will prove to be valuable in assisting Georgia Power and the Commission in the design and ultimate success of the electric transportation investments in supporting a competitive EV charging market. EVgo's perspective will support the

Commission in assessing the various approaches for implementation to most effectively support Georgia's EV charging infrastructure and encourage EV adoption. Indeed, EVgo has demonstrated its ability to contribute constructively to utility proceedings across the nation involving EV charging infrastructure to achieve mutually beneficial outcomes for utilities, ratepayers, and EV drivers, and will do so in this proceeding.³

12. 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:

Nikhil Vijaykar
Jason Keyes
Alicia Zaloga
Keyes & Fox LLP
580 California St. 12th Floor
San Francisco, CA 94104
Phone: (408) 621-3256
Email: nvijaykar@keyesfox.com
jkeyes@keyesfox.com
azaloga@keyesfox.com

WHEREFORE, EVgo respectfully requests the Commission grant this request for leave to intervene and admit EVgo as a party to this proceeding with all rights attendant thereto, including the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

³ EVgo has been a party in public utility commission proceedings concerning the proposed investments and rate design in many states including but not limited to Arizona, California, Colorado, Connecticut, Florida, Maryland, New Jersey, New York, North Carolina, Virginia, and Texas.

Respectfully submitted this 5th day of August, 2022,

BY: 

Nikhil Vijaykar
KEYES & FOX LLP
580 California St., 12th Floor
San Francisco, CA 94104
Phone: (408) 621-3256
Email: nvijaykar@keyesfox.com

Counsel for EVgo

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CERTIFICATE OF SERVICE

I hereby certify that I have served the following parties with the foregoing EVgo's

Application for Leave to Intervene via electronic mail as follows:

Kelley Balkcom
Mark Vinson
Director, Regulatory Affairs
Georgia Power Company
Regulatory Affairs Bin 10230
241 Ralph McGill Blvd., N.E.
Atlanta, Georgia 30308-3374
mmcclosk@southernco.com
mvinson@southernco.com

Brandon Marzo
Steven Hewitson
Allison Pryor
Troutman Sanders LLP
Bank of America Plaza, Suite 5200
600 Peachtree Street N.E.
Atlanta, GA 30308-2216
brandon.marzo@troutman.com
steven.hewitson@troutman.com
allison.pryor@troutman.com

Kyle Leach
Vice President of Pricing & Planning
Georgia Power Company
Bin 10230
241 Ralph McGill Boulevard, NE
Atlanta, GA 30308-3374
kcleach@southernco.com

Kevin Greene, Esq.
Troutman Pepper Hamilton Sanders LLP
600 Peachtree Street NE,
Suite 3000
Atlanta, GA 30308-2216
kevin.greene@troutmansanders.com

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

Preston Thomas
Jamie Barber
Alex Davis
Robert Trokey
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
pthomas@psc.state.ga.us
jamiieb@psc.ga.gov
adavis@psc.ga.gov
rtrokey@psc.ga.gov

Charles B. Jones, III
Lloyd Avram
Roy Bowen

Jeffry C. Pollock
J. Pollock Incorporated
12647 Olive Boulevard, Suite 585

Georgia Association of Manufacturers
The Hurt Building
50 Hurt Plaza, Suite 985
Atlanta, Georgia 30303
(404) 688-0555
(404) 584-0720 (fax)
cjones@gamfg.org
lavram@gamfg.org
rbowen@gamfg.org

Liz Coyle
Georgia Watch
55 Marietta Street, Suite 903
Atlanta, GA 30303
404-525-1085 ext. 402
lcoyle@georgiawatch.org

Kevin Higgins
Justin Bieber
ENERGY STRATEGIES, LLC
215 South State Street, Suite 200
Salt Lake City, Utah 84111
Ph: 801-355-4365 Fax: 801 5219142
khiggins@energystrat.com
jbieber@energystrat.com

Emily W. Medlyn
General Attorney
U.S. Army Legal Services Agency
ELD Division
9275 Gunston Road
Fort Belvoir, Virginia 22060-4446
Telephone: (703) 614-3918
Facsimile: (703) 806-0123
emily.w.medlyn.civ@army.mil

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

St. Louis, Missouri 63141
(314) 878-5814
(314) 878-7339 (fax)
jcp@jpolllockinc.com

Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Telephone: 513-421-2255 Fax: 513-421-2764
E-mail: kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

Dante Mugrace
PCMG and Associates
90 Moonlight Court
Toms River, NJ 08753
Dmugrace@pcmgregcon.com

Jim Clarkson
Resource Supply Management
135 Emerald Lake Rd
Columbia, SC 29209
803-312-3500
jclarkson@rsmenergy.com

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

Newton M. Galloway, Esq.
Terri M. Lyndall, Esq.
Galloway & Lyndall, LLP
406 North Hill Street
Griffin, Georgia 30223
(770) 233-6230
ngalloway@gallyn-law.com
tlyndall@gallyn-law.com

Steven C Prenovitz, MBA
Consultant
Concerned Ratepayers of Georgia
4295 Amberglade Ct
Norcross, GA 30092
770-448-8978
scprenovitz@gmail.com

Bryan Jacob
Southern Alliance for Clean Energy
1455 Hampton Hill Drive
Alpharetta, Georgia 30022
bryan@cleanenergy.org

Nicole R. Barnett Slaughter
G.A. State Bar No.: 039239
HAMLET LAW
5215 Junction Park Circle, Suite 202
Wilmington, NC 28412
Phone: 910-777-5995
Fax: 910-399-4277
nslaughter@hamlet-law.com
mhamlet@hamlet-law.com
smorin-gage@hamlet-law.com
jallen@hamlet-law.com

Alan R. Jenkins
Jenkins at Law, LLC
2950 Yellowtail Ave.
Marathon, FL 33050
(404) 729-2037
aj@jenkinsatlaw.com

Alicia Brown
City of Savannah, Office of Sustainability
801 E. Gwinnett Street

Ben J Stockton, PE, MBA
Executive Director
Concerned Ratepayers of Georgia
2230 Allen Road
Macon, GA 31216
404-924-5336
encomanager13@gmail.com

Katie Southworth
William Collier
Southface Energy Institute
241 Pine Street, NE
Atlanta, Georgia 30308
ksouthworth@southface.org
wcollier@southface.org

Robert B. Baker
Robert B. Baker, PC
2480 Briarcliff Road, NE, Suite 6
Atlanta, Georgia 30329
bobby@robertbbaker.com

Jennifer Whitfield
Jillian Kysor
Southern Environmental Law Center
Ten 10th Street, NW, Suite 1050
Atlanta, GA 30309
P: (404) 521-9900
F: (404) 521-9909
jwhitfield@selcga.org
jkysor@selcga.org

John R. Seydel
City of Atlanta Office of Resilience
55 Trinity Avenue
Atlanta, GA 30303
470-421-6160
Jrseydel@atlantaga.gov

David Nifong
City of Decatur, Department of Public Works
2635 Talley Street

Savannah, GA 31401
912-651-6838
alicia.brown@savannahga.gov

Mike Wharton
Athens-Clarke County Unified Government,
Sustainability Office
110 Bray Street
Athens, GA 30601
706-613-3838
Mike.Wharton@accgov.com

Donald Moreland
Georgia Solar Energy Association
1199 Euclid Avenue
Atlanta, GA 30307
P: (770) 548-2714
F: (404) 521-9909
don@solarcrowdsource.com

Matthew Deal
Jared Bellew
ChargePoint Inc.
254 E. Hacienda Ave.
Campbell, CA 95125
Phone: (202) 528-5008
Matthew.Deal@chargepoint.com
Jared.Bellew@chargepoint.com

Deborah Opie
Brionte McCorkle
Georgia Conservation Voters Education Fund
725 Ponce De Leon Ave FL 2
Atlanta, GA 30306
P: (404) 955-7013
deborah@gcvoters.org
brionte@gcvoters.org

Trudy Jones
Tia Brightwell
Terry Cummings
Shelia Edwards
Sandra Willis
Mckelson Fraser
Linda Gray-Clark
James Riles

Decatur, GA 30030
404-295-2764
david.nifong@decaturga.com

Nina R. Hickson
City of Atlanta
55 Trinity Avenue SW
Suite 5000
Atlanta, Georgia 30303
404-546-4600
NinaRHickson@AtlantaGa.Gov

Scott F. Dunbar
Keyes & Fox LLP
1580 Lincoln St., Suite 1105
Denver, CO 80203
(949) 525-6016
sdunbar@keyesfox.com

Nikhil Vijaykar
Jason Keyes
Keyes & Fox LLP
580 California St. 12th Floor
San Francisco, CA 94104
Phone: (408) 621-3256
nvijaykar@keyesfox.com
jkeyes@keyesfox.com

Harriet Feggins
Fenika Miller
Eugene Vickerson
Eddie White
Dorothy Burnam
Cynthia Tucker
Cynthia Pryor
H. Benjamin Williams
Christopher Stathums
Chequeta Riles
Carol Dollison
Brandon Winns
Anita Garnes
Tara Opie
Brendalyn Gardner
Candace Woodall
Sharrita Harden

Georgia Conservation Voters Education Fund
725 Ponce De Leon Ave FL 2
Atlanta, GA 30306
P: (404) 955-7013

dr.twj1@gmail.com
brightwelltia35@gmail.com
cummingsterry3@gmail.com
shelia@trappcomm.com
mssanwil@gmail.com
mckelsonfraser@yahoo.com
linda.clark64131990@outlook.com
jrismoney@aol.com
olivialoveu78@gmail.com
fenikamiller@gmail.com
eugenecvickerson@gmail.com
Edman1226@gmail.com
dorothyburnam@icloud.com
cynthiatucker34@yahoo.com
skeetscynthia@yahoo.com
docben@att.net
christathums@gmail.com
criles111@aol.com
directordoll@yahoo.com
Coronerbrandonmichael@gmail.com
anitagarnes17@gmail.com
Tarakspecializes@gmail.com
mimi2y2byazphil@gmail.com

choreografitti60@yahoo.com
ritaharden73@gmail.com

Dated: August 5, 2022



Nikhil Vijaykar
KEYES & FOX LLP
580 California St., 12th Floor
San Francisco, CA 94104
Phone: (408) 621-3256
Email: nvijaykar@keyesfox.com

Counsel for EVgo