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| **COMMISSIONERS:**  **TRICIA PRIDEMORE, Chairman**  **TIM G. ECHOLS, Vice-Chairman**  **FITZ JOHNSON**  **LAUREN “BUBBA” McDONALD JASON SHAW** |  | **REECE McALISTER**  **EXECUTIVE DIRECTOR**  **SALLIE TANNER EXECUTIVE SECRETARY** |
| Georgia Public Service Commission | | |
| **(404) 656-4501**  **(800) 282-5813** | **244 WASHINGTON STREET, SW ATLANTA, GEORGIA 30334-5701** | **FAX: (404) 656-2341**  **psc.ga.gov** |

August 19, 2022

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. 44280 / Georgia Power Company's 2022 Rate Case**

**Data Request from Commission Staff (STF-PIA-10)**

Dear Ms. Balkcom:

Enclosed herewith, please find Commission Staff Data Request **STF-PIA-10.** Georgia Power’s initial responses to this Data Request package are requested as soon as possible, but not later than **September 19, 2022.**

If you have any questions concerning this transmittal, please contact Jamie Barber at 404-651-5958.

Sincerely,

Jamie Barber

Unit Director

Energy Efficiency and Renewable Energy

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**In the Matter of )**

**)**

**) Docket No. 44280**

**Georgia Power Company’s )**

**2022 Rate Case )**

**STAFF'S DATA REQUEST STF-PIA-10 TO**

**GEORGIA POWER COMPANY**

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 a 3 ½ inch diskette or a 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 **September 19, 2022.**

## 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.

1. The term “you” and “your” refer to “the Company.”
2. The term “person” means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
3. 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.
4. 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.
5. “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.
6. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
7. “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.
8. “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 duces tecum, including the following:
   * 1. the type of document (e.g., letter, memorandum, etc.);
     2. the date of the document; the title or label of the document;
     3. the Bates number or other identifier used to number the document for use in litigation; the identity of the originator;
     4. the identity of each person to whom it was sent;
     5. the identity of each person to whom a copy or copies were sent;
     6. a summary of the contents of the document;
     7. the name and last known address of each person who presently has possession, custody or control of the document;
     8. 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.
9. “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:
  1. the privilege asserted and its basis.
  2. the nature of the information withheld;
  3. the subject matter of the document, except to the extent that you claim it is privileged.
     + 1. **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.**
       2. 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.
       3. 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.
       4. 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.
       5. **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:**

1. **the privilege asserted and its basis.**
2. **a log should be provided identifying starting and ending bates numbers.**
3. **the nature of the information withheld;**
4. **the subject matter of the document, except to the extent that you claim it is privileged.**
5. **a description of the document to which the privilege applies.**

1. What percentage of customers currently on Flat Bill would be eligible for Budget Billing? Please describe in detail how this percentage was determined.
2. For customers on Flat Bill during 2021, please provide the average monthly bill, the average monthly consumption. Please also provide what would have been the average monthly bill if those customers were on the standard (R) tariff?
3. Please provide all marketing/promotional material, target markets, and marketing strategy used by the Company during the last three years for the following tariff/payment options:
4. Flat Bill
5. Budget Billing
6. Pay by Day
7. Please provide any follow up efforts of the Company from the Income Qualified Discount Options Report that was filed in Docket No. 42516.
8. Please provide a list with details of the relationship for any organizations with which the Company partners to provide resources and/or information to its income qualified customers.
9. Regarding the proposed Charge It-Electric Vehicle rider (CIEV-1), how many customers does the Company expect to enroll on this tariff over the next three years? Given that this rider discounts the demand portion of the customer’s bill, what is the Company’s total aggregate expected discount for all CIEV-1 customers per year for the next three years?
10. Regarding the Company’s response to STF-PIA-6-44, does the uncertainty regarding environmental and fuel market conditions have any impacts on the determination of an RTP offer for a customer?
11. It would seem that the current unstable environmental and fuel market conditions increase the risk for losses for the Company on any of its fixed rates. How does the risk differ for FPA compared to other fixed tariffs available to large customers, such as PLL or TOU-GDS? Can the Company provide any analysis or customer data which exemplifies this disparity in risk?
12. Regarding the Company’s response to STF-PIA-6-44, what would the Company consider a stable environmental and fuel market in which it would begin offering FPA to customers?

**Capital Expenditures on Coal Plants**

1. In Docket No. 44160, the Commission’s Final Order amended the Stipulation to order that Plant Bowen 1 and 2 not be retired as part of the IRP and that such decertification and retirement be reassessed in the 2025 IRP. Please identify any additional costs associated with the undefined retirement date of Plant Bowen Units 1-2.
2. Please refer to the Environmental Investment and Expenses spreadsheet provided in APA-SPA-ADH-MBR-1, Schedule 3 ECCR, page 4:
3. Are any of the costs associated with the installation of ELG controls at Plant Bowen Units 3-4 being requested for rate base treatment in the Company’s 2022 Rate Case? If so, please list such costs and specify when those costs will be incurred.
4. Other than the costs associated with the installation of ELG controls at Plant Bowen Units 3-4, is the Company requesting any additional amounts to install ELG controls at Plant Bowen Units 1-2? If so, please list such costs and specify when those costs will be incurred. If not, please explain why ELG compliance for Bowen's Units 1-2 does not result in additional expenses.
5. Are any of the costs associated with the installation of ELG controls at Plant Scherer Units 1-2 being requested for rate base treatment in the Company's 2022 Rate Case? If so, please list such costs and specify when those costs will be incurred.
6. Please refer to Technical Appendix Volume 1, Selected Supporting Information of the IRP. Identify the amounts of projected capital expenditures for each plant, for each year, 2022 through 2025, for the following items:
7. Scrubbers
8. SCRs
9. Wastewater Treatment
10. MATS
11. CCR ash management
12. CCR landfill construction
13. All other controls

**Wansley Ash Pond Closure Comparison**

1. Please refer to the Coal Combustion Residual (CCR) - Asset Retirement Obligation (ARO) Compliance spreadsheet provided in APA-SPA-ADH-MBR-1, Schedule 3 ECCR, page 6 and 7:
2. Does the CCR ARO for 2023-2025 include costs associated with the closure of Wansley AP-1? If so, is the Company seeking recovery of costs associated with capping in place Wansley AP-1, as laid out in the Environmental Compliance Strategy originally filed in the IRP (January, 2022)?
3. Has Georgia Power started spending money on closure in place at this site? If so, provide a breakdown of which of those expenditures are transferable to the closure by removal strategy.
4. Since the IRP Final Order approved the retirement of Plant Wansley, according to Georgia Power’s Revised Environmental Compliance Strategy (April, 2022), the Company will switch its closure strategy at Wansley AP-1 to closure by removal. Please identify, and provide supporting calculations for, the cost differential between continuing closure in place as opposed to closure by removal.
5. Is the Company seeking recovery of the costs associated with closure by removal at Wansley AP-1 in this Rate Case? If so, how much is the Company requesting? If not, when will the Company seek those amended costs?
6. Will the Company update their CCR Semi-Annual report to address the cost difference between cap in place and closure by removal at Wansley AP-1?

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**In the Matter of )**

**)**

**) Docket No. 44280**

**Georgia Power Company’s )**

**2022 Rate Case**  )

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff’s Data Request STF-PIA-10** 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:

|  |  |  |
| --- | --- | --- |
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| Kelley Balkcom  Director, Regulatory Affairs  Georgia Power Company  Bin 10230  241 Ralph McGill Boulevard, NE  Atlanta, GA 30308-3374  MMCCLOSK@southernco.com | Brandon Marzo  Troutman Pepper Hamilton Sanders LLP  600 Peachtree Street NE, Suite 3000  Atlanta, GA 30308-2216  [brandon.marzo@troutmansanders.com](mailto:brandon.marzo@troutmansanders.com) | Dante Mugrace  PCMG and Associates  90 Moonlight Court  Toms River, NJ 08753  [Dmugrace@pcmgregcon.com](mailto:Dmugrace@pcmgregcon.com) |
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So certified, this 19th day of August 2022.

Jamie Barber

Unit Director

Energy Efficiency and Renewable Energy