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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 26, 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-LA-5)**

Dear Ms. Balkcom:

Enclosed herewith, please find Commission Staff Data Request **STF-LA-5.** Georgia Power’s initial responses to this Data Request package are requested as soon as possible, but not later than **September 26, 2022.**

If you have any questions concerning this transmittal, please contact Rob Trokey at 404-656-4549.

Sincerely,

Rob Trokey

Director

Electric Unit

**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-LA-5 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 26, 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.**

**Coal Inventory**

1. Coal inventory and consumption. For each month from January 1, 2020 through June 30, 2022, please provide the following information for each coal-fired generating plant:
2. Coal consumed tons
3. Cost of coal consumed
4. Average price per ton of coal consumed
5. Coal purchased tons
6. Cost of coal purchased
7. Average cost per ton of coal purchased
8. Tons in coal inventory
9. Cost of coal in coal inventory
10. Average price per ton in coal inventory
11. Coal inventory and consumption. Provide projections for the following information for the remainder of 2022 and each rate plan year 2023-2025 for each coal-fired generating plant:
12. Coal consumed tons
13. Cost of coal consumed
14. Average price per ton of coal consumed
15. Coal purchased tons
16. Cost of coal purchased
17. Average cost per ton of coal purchased
18. Tons in coal inventory
19. Cost of coal in coal inventory
20. Average price per ton in coal inventory
21. For the test year and each rate plan year (2023-2025), please identify the coal inventory quantities and costs, in total, and by plant that the Company has requested for rate base inclusion.
22. Does the Company maintain records of coal inventory quantities, coal deliveries, coal consumption and cost by plant? If not, explain fully why not. If so, please provide the coal inventory tons and cost, coal deliveries and coal consumption by plant for each month January 1, 2018 through June 30, 2022.
23. Coal inventory write-offs. For each month from January 2021 through August 2022, did the Company record any write-offs of coal inventory that remained at plants that were retired? If so, for each plant, identify each instance and identify the quantity of tons and the dollar amounts of coal inventory that was written off or determined to be unusable, and provide the related accounting entries.
24. Coal sales. For each month from January 2021 through August 2022, did the Company sell any coal? If so, identify by plant each instance and identify the quantity of tons and the dollar amounts of coal that were sold, explain the reason for each such sale, and provide the related accounting entries for each such sale.
25. Coal consumption during maximum burn periods. During each year 2020, 2021 and 2022 to date, in total, and separately for each plant, identify the maximum amount of coal tons that was burned/consumed in a consecutive 35-day period and identify the period in which such maximum coal consumption occurred.
26. Coal consumption during maximum burn periods. During each year 2020, 2021 and 2022 to date, in total, and separately for each plant, identify the maximum amount of coal tons that was burned/consumed in a consecutive 45-day period and identify the period in which such maximum coal consumption occurred.
27. Coal consumption during maximum burn periods. For each coal-fired generating plant unit that is still operating in 2022, during each of the past ten years through 2021, identify the maximum amount of coal tons that was burned/consumed during each of the following periods: (1) a monthly period, (2) a 35-day period, (3) a 45-day period and (4) a two-month period. Also identify with specific dates each of the identified periods in which such maximum coal burn/consumption occurred and the tons of coal consumed at each GPC plant during each such period.
28. During 2020, 2021, and to-date in 2022, did any of GPC's coal suppliers with whom GPC had coal supply contracts, declare bankruptcy? If so, please identify and explain each such instance. Also describe how that affected GPC 's access to coal supply and the delivery of coal to each of GPC 's generating plants, and whether and how it impacted GPC 's coal inventory and coal procurement decision making.
29. During 2020, 2021, and to-date in 2022, did any of GPC's coal suppliers with whom GPC had coal supply contracts, declare force majeure events that excused having to make coal deliveries? If so, please identify and explain each such instance. Also describe how that affected GPC 's access to coal supply and the delivery of coal to each of GPC 's generating plants, and whether and how it impacted GPC 's coal inventory and coal procurement decision making.
30. During 2020, 2021, and to-date in 2022, has GPC experienced disruptions in getting contracted coal supplies delivered to any of its generating plants? If so, please identify and explain each such instance and also describe how that affected GPC 's coal inventory levels and GPC 's planning for and management of coal inventory at each of its plants.
31. During 2020, 2021, and to-date in 2022, has GPC experienced an unplanned outages at any of its coal-fueled generating plants? If so, please identify and explain each such instance and also describe how that affected GPC 's coal burn levels, its coal inventory levels and GPC 's planning for and management of coal inventory at each of its plants.

**Impacts of recently passed federal legislation**

1. Will the Company be eligible to obtain any tax credits, or tax savings in 2022, 2023, 2024 or 2025 from the Inflation Reduction Act that was recently passed, such as, but not limited to, using renewable energy, reduced employee and retiree health care and prescription costs, or other provisions?
2. If not, explain fully why not.
3. If so, identify, quantify and explain all expected tax credits and tax savings benefits that the Company would be eligible for.
4. If different than the response to part b, identify, quantify and explain all benefits under the Act which the Company expects to claim for each year 2022, 2023, 2024 and 2025.
5. Is the Company expected to be impacted by any of the federal income tax provisions in the Inflation Reduction Act in any year, 2022, 2023, 2024 or 2025?
6. If not, explain fully why not.
7. If so, identify, quantify and explain all expected impacts, by line item, on rate base and operating income.
8. Employee benefit costs related to prescription drugs.
9. Identify the amount of employee benefits cost that the Company incurred in 2021, and projects for each year, 2022 through 2025, involving or related to the cost for prescription drugs that are provided under the Georgia Power Company employee and retiree health care plans.
10. Identify the amount of employee benefits cost that the Company incurred in 2021, and projects for each year, 2022 through 2025, involving or related to the cost for prescription drugs that are provided under Southern Company Services employee and retiree health care plans.
11. Identify the amount of employee benefits cost that the Company incurred in 2021, and projects for each year, 2022 through 2025, involving or related to the cost for prescription drugs that are provided under Southern Nuclear Operating Company employee and retiree health care plans.
12. Identify the reduction to the employee benefits cost that could be expected for the test year and for each plan year, 2023 through 2025, involving or related to the cost for prescription drugs that is expected to result from having Medicare bargain for the cost of prescription drugs, as provided for in the Inflation Reduction Act of 2022.
13. What assumptions did Georgia Power Company and/or its actuary and affiliated Service Company make about the impact of prescription drug costs in projecting Other Post Employment Benefit (OPEB) costs for each plan year, 2023 through 2025?
14. What assumptions did Georgia Power Company and/or its actuary and affiliated Service Company make about the impact of prescription drug costs in projecting employee health care benefit costs for each plan year 2023 through 2025?
15. Is the Infrastructure Investment and Jobs Act expected to have any impact on any rate base or operating income amounts that the Company has used for the test year and/or for any of the 2023 through 2025 plan years?
16. If not, explain fully why not.
17. If so, identify, quantify and explain all expected impacts, by line item, on rate base and operating income.

**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-LA-5** 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:

|  |  |  |
| --- | --- | --- |
| Sallie Tanner  Executive Secretary  Georgia Public Service Comm.  244 Washington Street, SW  Atlanta, GA 30334  stanner@psc.state.ga.us | 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 |
| 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 26th day of August 2022.

Rob Trokey

Director

Electric Unit