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September 20, 2022

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

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

Dear Ms. Tanner:

Enclosed for filing with regard to the above-referenced proceeding is Georgia Power Company's Objection and Response to the Application of Lightstar Renewables, LLC for Leave to Intervene.

Please call me at (404) 885-3683 if you have any questions regarding this filing.

Sincerely,

Brandon F. Marzo

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

In re:	
GEORGIA POWER COMPANY'S 2022 RATE CASE	**Docket No. 44280**

GEORGIA POWER COMPANY'S OBJECTION AND RESPONSE TO THE APPLICATION OF LIGHTSTAR RENEWABLES, LLC FOR LEAVE TO INTERVENE

Pursuant to O.C.G.A. § 46-2-59(d), Commission Rule 515-2-1-.06, and Part II of the April 5, 2022, Procedural and Scheduling Order ("PSO"), Georgia Power Company ("Georgia Power") hereby and respectfully files this Objection and Response to the Application of Lightstar Renewables, LLC ("Lightstar") for Leave to Intervene (the "Application").

OBJECTIONS TO INTERVENTION

1. **Lightstar's Application fails to demonstrate a legal, property, or other interest in this proceeding and is untimely.**

Georgia law requires that "[a]ny such application shall be in writing, shall be verified either by the party intervening or by his attorney on information and belief, shall identify the party requesting the intervention, and **shall set forth with particularity the facts pertaining to his interest and the grounds upon which his application for intervention are based.**" O.C.G.A. § 46-2-59(c) (emphasis added). The Lightstar Application provides no basis for intervention in the 2022 Rate case and fails to identify any projects in Georgia or any other legal or property interest in this proceeding. Indeed, Lightstar simply recites a general mission statement as a solar developer, which is insufficient to justify intervention in this proceeding. (*See* Application at ¶ 2.)

Specifically, Lightstar's Application asserts no clear interest in the *present* matter, nor does it provide any indication how its participation will address any of the *current* issues described in Part V of the Procedural and Scheduling Order. Rather, Lightstar only indicates a potential future interest in a renewable pilot program that it desires to see created. (*See* Application at ¶ 1.) Lightstar similarly requested consideration of a pilot program in the 2022 Integrated Resource Plan (the "2022 IRP") through a letter submitted to the Commission on July 11, 2022. Lightstar did not intervene in the 2022 IRP. Having failed to participate in that proceeding, it seeks to use this forum, which is not a resource planning proceeding, to propose adoption of a new renewable program. As this Commission is aware, the Company's base rate case is not the appropriate proceeding in which to propose adoption of new renewable programs. The 2022 IRP, which would have been the appropriate time to propose the program, concluded with the issuance of the final order issued on July 29, 2022. Because it has no cognizable interest in the 2022 Rate Case, Lightstar's Application should be denied.

2. Lightstar's interests are adequately represented by other intervening parties.

To the extent Lightstar's Application asserts any interest in the 2022 Rate Case related to cost recovery for renewable programs, it should nonetheless be denied. Despite Lightstar's conclusory claim that its interests are not adequately represented by parties to the proceeding, the Application fails to acknowledge the participation of the Solar Energy Industries Association ("SEIA"), a national trade organization of which Lightstar is an active member.[1] To the extent Lightstar has an interest related to specific issues in the 2022 Rate Case, such interests are adequately represented by SEIA. Accordingly, Lightstar's Application should be denied.

[1] *Membership Directory*, SOLAR ENERGY INDUSTRIES ASSOCIATION, https://www.seia.org/directory/lightstar-renewables (last visited Sept. 19, 2022).

CONCLUSION

For the above reasons, Lightstar's Application for Leave to Intervene should be denied.

Respectfully submitted this 20th day of September, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing GEORGIA POWER COMPANY'S OBJECTION AND RESPONSE TO THE APPLICATION OF LIGHTSTAR RENEWABLES, LLC FOR LEAVE TO INTERVENE IN DOCKET NO. 44280 upon all parties listed below via electronic service or by hand delivery and addressed as follows:

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This 20th day of September 2022.



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