**BEFORE THE**
**GEORGIA PUBLIC SERVICE COMMISSION**

| | | |
|---|---|---|
| **In Re:** | **)** | |
| **Georgia Power 2022 Rate Case** | **)** | **Docket No. 44280** |
| | **)** | |

---

**DIRECT TESTIMONY OF**

**KEVIN L. HURLEY**
**ON BEHALF OF THE**
**METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY**

**Q. STATE YOUR NAME, BUSINESS POSITION AND BUSINESS ADDRESS, AND NATURE OF APPEARANCE IN THIS PROCEEDING.**

**A.** My name is Kevin L. Hurley. I am Deputy Chief Financial Officer of the Metropolitan Atlanta Rapid Authority ("MARTA"), 2424 Piedmont Rd. Atlanta, GA 30324. I have the pleasure of appearing today on behalf of MARTA, the public authority responsible for operating bus, paratransit, light rail, and rapid rail service in the City of Atlanta, Fulton County, DeKalb County, and Clayton County, to express MARTA's concern with the cost of electricity for rail propulsion service and to update the Commission on our work to electrify MARTA's fleet and service vehicles as well as provide Electric Vehicle charging infrastructure for our employees and patrons. MARTA stands to be affected by this Commission's decisions concerning Georgia Power's proposed increase to the Electric Transportation Service ("ET") tariff as well as Georgia Power's Electric Vehicle rates and policies.

**Q. BRIFLY DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL EXPERIENCE**

**A.** I am a 1988 graduate of the University of Georgia with a bachelor's degree in finance, I have a Master of Business Administration from the University of Phoenix, and I am a Certified Retirement Fiduciary. I joined MARTA in 1999 and now have twenty-three (23) years of experience with MARTA, serving in various accounting and financial management positions, with increasing levels of responsibility. I currently serve as the Deputy Chief Financial Officer. Prior thereto, I served as interim Chief Financial Officer for eighteen (18) months. I also recently served as the chair of MARTA's Non-Represented Defined Contribution Pension Committee, and co-chaired MARTA's Represented Defined Benefit Pension Committee. I am also the past Vice President of the Board of Directors for the Georgia Association of Public Pension Trustees.

Prior to joining MARTA, I was senior analyst for The Boeing Company. Prior to Boeing I was a Captain in the United States Air Force where for eight years I was Comptroller, Flight Commander, and Financial Analysis Branch Chief

**Q. WHAT ARE YOUR DUTIES FOR MARTA?**

**A.** As I mentioned, I have served in a range of accounting and financial management positions with MARTA during my twenty-three (23) year tenure. I am familiar with MARTA's financial situation, its operating budget and capital expansion plans. In my current role as Deputy Chief Financial Officer, I support MARTA in the areas of business and financial analysis to ensure maximum yield for investments. I oversee MARTA's debt program,

Accounting and Revenue collections, fare media, cash and investment management, energy hedging, financial modeling, and parking services.

**Q. WHAT HAVE YOU DONE TO PREPARE YOUR TESTIMONY IN THIS MATTER?**

**A.** In addition to relying on my personal experience and knowledge of MARTA's electrical power costs and operations, including its history and benefits to the region, I have reviewed MARTA's electrical power usage and requirements as well as the current rate structure of MARTA's accounts with Georgia Power. I have also consulted colleagues regarding MARTA's history and dealing with Georgia Power and reviewed Georgia Power's filing and the direct testimony of its witnesses in this case. I have discussed these issues with my colleagues and MARTA's attorneys and consultants and arrived at the conclusions and recommendations presented in this testimony.

**Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

**A.** Yes, I testified on behalf of MARTA in the 2021 Rate Case, Docket 43838.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

**A.** The purpose of my testimony is to support MARTA's request that its electric service rate for the Electric Transportation Service ("ET") tariff not be increased but held at current rates. In previous rate proceedings, Georgia Power and this Commission have recognized MARTA's value and importance in helping to make Georgia one of the best states to do business. MARTA continues to be a driver in economic growth in the Metro Atlanta area and State. With the growth that has and continues to occur, there has been and continues to be a strong demand for office and residential properties within a half mile of MARTA's rail stations. For example, MARTA's transit-oriented development projects have resulted

in the development of at least 1,919 multifamily units, 379,300 SF of retail, roughly 2.8 million SF of office, more is in progress and planned over the next decade. MARTA's services and operations continue to be a driver for companies locating and relocating to the area. MARTA's value and importance as a partner in economic development continues to be far greater to Georgia Power, Metro Atlanta, and the State of Georgia than MARTA as a ratepayer. MARTA's ability to execute its capital program is as critical to the future growth of the Metro Atlanta region as the Region's water supply. Reliable, affordable, and efficient public transportation is critical to the continued development and future of the metro area and the state.

## THE MARTA PUBLIC TRANSIT SYSTEM AND ITS OPERATION

**Q. PLEASE DESCRIBE THE GENERAL AUTHORITY OF MARTA**

**A.** MARTA is a public authority established by an Act of the Georgia General Assembly in 1965, and approved by subsequent voter referenda, for the purpose of acquiring, planning, designing, building, maintaining, and operating a public rapid transit system in the City of Atlanta, and in Fulton, DeKalb, and Clayton Counties. In 1972 MARTA acquired the Atlanta Transit System, Inc., and took over the operation of bus service in Fulton and DeKalb Counties and the City of Atlanta. In June 1979 MARTA initiated rapid rail service powered by electricity provided by Georgia Power Company.

**Q. DESCRIBE THE GENERAL FEATURES OF MARTA'S RAPID RAIL SYSTEM**

**A.** MARTA's rapid rail system consists of over one hundred twenty (120) miles of electrified rail in a dedicated right of way, providing, providing forty-eight (48) miles of total rail service via thirty-eight (38) rail stations. The Authority owns a fleet of three hundred

thirty-eight (338) rail cars powered by alternating current (AC) electrical power. All rail cars are equipped with regenerative braking systems, so power produced during braking (when propulsion motors operate as generators) is available for consumption by adjacent trains fed from the third rail system.

**Q. HOW DOES MARTA COMPARE TO OTHER HEAVY RAIL TRANSIT PROVIDERS IN THE UNITED STATES?**

**A.** MARTA serves 2.2 million residents of Metro Atlanta living within our service area and is among the largest transit system in North America (by unlinked passenger trips) providing bus, rail, and mobility services. According to analysis by the National Transit Database, MARTA has one of the lowest costs per-revenue mile for heavy rail service of any public transit system in the United States.

**Q. EXPLAIN THE BENEFITS MARTA PROVIDES TO THE METROPOLITAN ATLANTA REGION AND STATE OF GEORGIA**

**A.** The immediate transportation benefits include providing bus, light rail, mobility, and rapid rail transit service for nearly one-half million passenger boardings each weekday prior to the Covid-19 pandemic and just under 300,000 as we recover from the pandemic, a number that continues to grow. This includes connecting bus and rail service for passengers entering the service area via bus service provided by MARTA's regional partners, CobbLinc, Gwinnett County Transit and Xpress, operated by the Atlanta Region Transit Link Authority. This connection service provides access to employment, services and opportunities for the transit-dependent, mobility for the disabled, convenience for visitors and special events patrons, and a reduction in traffic congestion and pollution for all residents of the region.

MARTA is also a driver of economic development in the metro-area and region. MARTA helps attract new businesses and other development to its service footprint. Many companies wish to locate their businesses and offices near transit, and in particular heavy rail, to reduce their employees carbon emissions, transportation costs, and commuting stress and benefit from the direct connection to the terminal at Hartsfield-Jackson International Airport. Young professionals and younger generations, in general, tend to embrace public transportation, with a larger percentage preferring to live and work in and near communities with reliable, efficient, and affordable public transportation service and quick and easy access to public transportation.

Transit Oriented Development (TOD) on former MARTA surface parking areas has proved hugely successful, both in terms of attracting businesses to the metro-area and increasing residential development in close proximity to services. Residential developments at Avondale, Edgewood/Candler Park, King Memorial, and Chamblee Stations are prime examples of areas with major residential developments on ground leases with MARTA. Transit oriented development is advancing at MARTA's Arts Center, North Avenue, and Bankhead stations as well. By the numbers, MARTA's transit oriented development includes:

- Built TOD to date: MARTA's transit-oriented development projects have resulted in the development of at least 1,919 multifamily units, 379,300 SF of retail, and roughly 2.8 million SF of office.

- TOD in Negotiation/Predevelopment: Currently in negotiation and predevelopment phases are an additional 1,045 multifamily units, 10,000 SF of retail, and 475,000 SF of office space.
- TOD in Procurement includes 1,395 multifamily units and 1.5 million SF of office
- TOD in Planning includes 6,700 multifamily units and 70,000 SF retail space

In total that equates to an additional approximately 9,140 multifamily units, 80,000 SF retail space, and 2 million SF of office space to be brought online over the next fifteen (15) years at an estimated cost of $4.75 billion. The potential is even greater as MARTA has other land holdings that have not yet been fully evaluated, affording additional opportunities for development.

Microsoft, Mercedes-Benz, State Farm, and NCR are just a few of the companies which have deliberately located near MARTA stations to take advantage of public transportation for their employees. When State Farm Insurance moved its headquarters, with over 2 million square feet of office space, from Johns Creek to Dunwoody Station, they also built a platform extension and a new entrance to MARTA to make riding transit convenient for their employees. Atlanta's bid for Amazon's HQ2 advanced through Amazon's site selection process because there were 10 potential office sites near MARTA rail stations. Microsoft's recent decision to develop a 90-acre campus on the Westside of Atlanta was due in part to the proximity of the Bankhead rail station. MARTA is now in the process of expanding the size of the Bankhead station rail platform to be able to accommodate trains up to 6 cars from the current 2 car platform.

Georgia's FY22 state budget includes the first ever line item for MARTA. MARTA will receive $6 million to support the positive economic impacts of the Bankhead station expansion.

MARTA plans to spend more than $3 billion on capital projects over the next ten years. The current ten-year budget includes $715 million in More MARTA spending within the City of Atlanta, including $200 million to transform the Five Points Station. MARTA's largest capital expenses over the next ten years include approximately $680 million to replace aging rail cars with more energy efficient cars and $371 million for station rehabilitation and improvement.

**Q. DESCRIBE IN GENERAL MARTA'S RELIANCE ON GEORGIA POWER COMPANY IN MARTA'S OPERATIONS OF THE RAPID TRANSIT SYSTEM.**

**A.** The light rail (streetcar) and rapid rail systems are powered by electricity provided by Georgia Power Company. During the design and construction of the heavy rail system the Authority contracted with Georgia Power for the construction of electrical distribution facilities to serve the heavy rail system. During the construction of the heavy rail system, MARTA funded the construction of over 100 substations for traction and station power, cabling, and electrical duct banks. This system delivers electrical power from Georgia Power directly to MARTA for use by rail vehicles and for essential station loads such as lighting, faregates, ticketing machines, elevators, escalators, and station audio-visual information systems. MARTA has placed its first six zero-emission electric buses in service in May 2022. MARTA was awarded a $3.85 million Senate earmark and a $19.3 million Federal Transit Administration Low and No Emission Bus grant to

further advance the fleet transition to electric. Further, all future Bus Rapid Transit projects are expected to utilize electric buses.

**Q. HOW DOES GEORGIA POWER COMPANY PARTICIPATE IN THE CONSTRUCTION, MAINTENANCE, AND IMPROVEMENT OF THE ELECTRICAL TRANSMISSION SYSTEM FOR MARTA'S RAPID RAIL SYSTEM?**

A. Georgia Power Company is a contractor to MARTA for work required for the construction, maintenance, and improvement of the electrical transmission system for the rapid rail system. Contracts are negotiated between the Company and MARTA for the performance of specified maintenance or improvements to the electrical transmission system service. Georgia Power is compensated under those contracts through MARTA's operating or capital budgets, as applicable, for each project, in addition to all sums paid to Georgia Power for electrical consumption. Since the inception of the MARTA rail system, MARTA has invested well over $500 million in capital funds for the construction, maintenance, and improvement of the electrical transmission system by which Georgia Power serves MARTA. The financial and operational responsibilities for the maintenance and continued improvement of the electrical transmission system are borne by MARTA. Georgia Power's other ratepayers do not subsidize MARTA. We currently have plans to spend nearly $200 million in modernizing our 40-year- old electrical system. This does not include numerous transit- oriented development (TOD) projects or major expansion projects outlined in the Atlanta More MARTA Plan and Clayton County Plan, which will bring new high capacity transit, new maintenance

depots, new stations and additional vehicles to the Atlanta region and increasing the MARTA'S electrical load.

**Q. PLEASE DISCUSS MARTA' BASIC FINANCIAL STRUCTURE. HOW IS MARTA'S OPERATING BUDGET FUNDED?**

A. As a public authority, the funding sources for operation of the MARTA system consist of: (1) the proceeds of a one percent sales and use tax levied in Fulton County, DeKalb County, Clayton County and 1.5 percent from the City of Atlanta, (2) fare box revenues collected from passenger fares, (3) leases of property, including long term ground leases for TOD, (4) federal formula funds for preventive maintenance, (5) automobile ad valorem taxes from Fulton, DeKalb and Clayton counties and (6) other revenues derived from activities such as advertising on buses, rail cars, rail stations and bus shelters, and short term leases of surplus property.

**Q. HOW IS MARTA'S CAPITAL BUDGET FUNDED?**

A. The funding sources for capital improvements and expansion of the MARTA system consist of: (1) the proceeds of the one percent sales and use tax from Fulton, DeKalb and Clayton counties and the 1.5 percent sales tax from the City of Atlanta, and (2) federal and state grant funds.

**Q. AS A PUBLIC AUTHORITY, DOES MARTA RECEIVE ANY BUDGET BENEFITS FROM ITS PAYMENTS TO GEORGIA POWER?**

A. No. As a public authority, MARTA does not pay taxes and does not return a profit. Therefore, MARTA's payments to Georgia Power for the provision of electrical service are borne completely by the operating budget, without any offset for tax deductions. When electrical power costs increase, a corresponding increase must occur in operating

revenue to provide for payment of electrical costs, or a corresponding decrease in costs must occur to continue offering the same level of service. Since the sales tax is fixed by state law, the only mechanisms for dealing with increased electrical costs are to increase passenger fares or reduce operating expenses.

**Q. PRIOR TO THE COVID-19 PANDEMIC WHAT DID MARTA DO TO REDUCE ITS COSTS AND IMPROVE ITS FINANCES?**

**A.** Prior to the COVID-19 Pandemic, MARTA implemented measures to prepare for the demands of the future while maintaining and improving quality services. MARTA began implementing prudent and aggressive cost-cutting measures, efficiency innovations and new revenue generation opportunities to improve service delivery to its customers and avoid a fare increase. MARTA's pre-pandemic cost reductions were made to improve existing transit services while positioning itself for future investment and expansion. One of MARTA's major strategic priorities was to achieve financial viability and stability. To this end we have engaged in cost reduction measures, including staff reductions, outsourcing, and asking all business partners to assist MARTA by holding down costs. In August, Fitch upgraded MARTA's credit rating to AA based on MARTA's having demonstrated a sustained maintenance of liquidity and financial resilience.

**Q. WHAT ACTION HAS MARTA TAKEN OVER THE YEARS TO REDUCE ITS ELECTRICAL COSTS, OTHER THAN REDUCING SERVICE?**

**A.** After the 2007 Rate Case, a small part of MARTA's electrical power usage began to be purchased under marginal or real-time pricing (RTP) to realize cost savings where possible. At the conclusion of the 2013 rate case MARTA moved 40% of its rail

propulsion load to marginal pricing. However, as the scale of operations changed this needed to be adjusted. For obvious reasons, the rail system must provide service, and therefore has a greater demand for electrical power during the weekday morning and afternoon rush hours when there is the greatest passenger demand for service. Generally, those needs are difficult if not impossible to delay or shift to off-peak times. However, MARTA developed new system operations to reduce electrical use in peak times through sophisticated speed controls and other methods. We have successfully demonstrated this to Georgia Power's satisfaction and had been able to lower the customer base load (CBL) for propulsion service under the ET tariff. Other changes including renovation of MARTA's HVAC system at its headquarters and replacement of station lighting with more energy efficient LED fixtures.

**Q. HAS MARTA DEVELOPED OTHER INITIATIVES FOR ALTERNATIVE ENERGY CONSUMPTION?**

**A.** Yes. MARTA received a federal grant to design, construct and maintain a solar power canopy array at the MARTA Laredo Bus Facility in DeKalb County which is one of four bus facilities operated by MARTA in its service area. The solar project has been operating since the fall of 2011 and generates enough electricity to offset a significant portion of the Laredo Facility's electricity consumption. Also, MARTA has upgraded lighting fixtures at all rail stations, maintenance and office facilities to LED and replaced HVAC and chillers, resulting in 14% energy use reduction since 2012. MARTA is currently evaluating additional solar investments throughout the system.

There are several things we are doing or planning that will assist the Georgia Power system:

- We ordered $680 million of new and more energy efficient rail cars which will begin arriving in November 2024.
- We are replacing natural gas-driven compressors with large electric motors for refueling our natural gas-powered buses. These new motors will operate at night when the buses return to the refueling stations. This increases the utility load factor during off-peak hours making the system more efficient.
- MARTA like other transit systems, is studying the use of "super capacitors" on our rail cars. These devices capture braking energy and use the stored energy to restart rail car motion. This technology not only reduces energy use but helps stabilize the utility system.
- We have increasingly sophisticated centralized controls for our trains and will be able to reduce speeds to reduce power use during critical periods.
- MARTA was awarded a federal grant in 2019 for six (6) electric buses and two fast charging stations to begin the transition from diesel and compressed natural gas-powered buses to all electric buses. The buses are in service between North Avenue and Edgewood/Candler Park. With additional federal funding from a Senate earmark and an additional Federal Transit Administration grant, MARTA has plans to add thirty-one (31) more electric buses by 2024. Future Bus Rapid Transit (BRT) lines including Summerhill, Clayton Southlake and Campbellton will be served by electric buses.
- MARTA has been and continues to work with Georgia Power on deployment of Electric Vehicle (EV) charging facilities at stations and parking facilities. Over 60 chargers have been installed at nine stations as part of Phase One of the EV program. MARTA has EV charging spaces at 9 locations with 11 more in the implementation stage.

## THE IMPACT OF THE COVID-19 PANDEMIC UPON MARTA'S OPERATIONS AND FINANCES SINCE MARCH 2020

**Q. WHAT IMPACT HAS THE COVID-19 PANDEMIC HAD ON MARTA'S CURRENT FINANCIAL OUTLOOK?**

A. The Covid-19 Pandemic has had a dramatic impact on MARTA's ridership and budget. Passenger revenues decreased dramatically after the declaration of the pandemic and implementation of shelter in place orders in March 2020. April 2020 revenues were approximately $2 million, down from $10 million in February 2020. MARTA's actual passenger revenues for 2020 were down $30 million and $79 million in 2021 due to the pandemic. While passenger revenues are starting to recover, they are still 60% of pre-pandemic levels and not projected to return to pre-pandemic levels until 2024 or 2025. MARTA has not included a fare increase in its current budget to provide an additional incentive to its riders to use public transportation again as more people return to work, school, and social events and activities. Additionally, all 110 bus routes were restored to full service by April 24, 2021.

**Q. HAS THE FEDERAL PANDEMIC ASSISTANCE COMPLETELY OFFSET THE SALES TAX AND PASSENGER REVENUE LOSES?**

A. While the Federal financial assistance has been critical to MARTA during these difficult times it has not completely offset or replaced all MARTA's lost revenues from lower sales taxes and passenger revenues. The Federal assistance has filled the short-term revenue gap in FY2020 and FY2021. Furthermore, the Federal assistance buys MARTA the time necessary, due to the uncertainty in timing and levels of fare revenue recovery, to reset MARTA's revenue and expense baselines. MARTA will make budget adjustments over the next few years to maintain balanced budgets into the future without

stimulus fund use. While MARTA anticipates growth in ridership over the next few years, passenger revenues still hover around 60% below pre-pandemic levels, and ar not projected to return to pre-pandemic levels until 2025. Of course, those projections depend on how long the pandemic lingers and how inflation impacts the economy.

**Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

**A.** Yes.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing TESTIMONY OF KEVIN HURLEY upon the following persons by causing electronic copies of the same to be transmitted to each interested party that has supplied a valid email address, and all other parties to be served via first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

| | |
|---|---|
| Sallie Tanner<br>Executive Secretary<br>Georgia Public Service Commission<br>244 Washington Street, S.W.<br>Atlanta, GA 30334<br>TEL: 404-463-7747<br>FAX: 404-656-2341<br>stanner@psc.ga.gov | **On Behalf of Georgia Watch:**<br>(Intervention filed 07-06-22)<br><br>Liz Coyle<br>Georgia Watch<br>55 Marietta Street, Suite 903<br>Atlanta, GA 30303<br>TEL: 404-525-1085 ext. 402<br>lcoyle@georgiawatch.org |
| **On Behalf of Georgia Public Service Commission:**<br><br>Preston Thomas<br>Staff Attorney<br>Georgia Public Service Commission<br>244 Washington Street, S.W.<br>Atlanta, GA 30334<br>TEL: 656-4554<br>FAX: 404-656-0980<br>E-M: pthomas@psc.state.ga.us | **On Behalf of The United States Departent of Defense and All other Federal Executive Agencies:**<br>(Intervention filed 07-12-22)<br><br>Emily W. Medlyn<br>General Attorney<br>U.S. Army Legal Services Agency<br>ELD Division<br>9275 Gunston Road<br>Fort Belvoir, VA 22060-4446<br>TEL: 703-614-3918<br>FAX: 703-806-0123<br>emily.w.medlyn.civ@army.mil |
| **On Behalf of Georgia Power Company:**<br><br>Brandon Marzo<br>Troutman Pepper<br>Bank of America Plaza, Suite 5200<br>600 Peachtree Street, N.E.<br>Atlanta, GA 30308-2216<br>TEL: 404-885-3146<br>brandon.marzo@troutman.com | **On Behalf of Resource Supply Management:**<br>(Intervention filed 07-15-22)<br><br>Jim Clarkson<br>Resource Supply Management<br>135 Emerald Lake Rd<br>Columbia, SC 29209<br>TEL: 803-312-3500<br>jclarkson@rsmenergy.com |

| | |
|---|---|
| **On Behalf of The Georgia Association of Manufacturers:**<br>(Intervention filed 06-29-22)<br><br>Charles B. Jones, III<br>Lloyd Avram<br>Roy Bowen<br>Georgia Association of Manufacturers<br>The Hurt Building<br>50 Hurt Plaza, Suite 985<br>Atlanta, GA 30303<br>TEL: 404-688-0555<br>FAX: 404-584-0720<br>cjones@gamfg.org<br>lavram@gamfg.org<br>rbowen@gamfg.org<br><br>Jeffry C. Pollock<br>J. Pollock Incorporated<br>12647 Olive Boulevard, Suite 585<br>St. Louis, MO 63141<br>TEL: 314-878-5814<br>FAX: 314-878-7339<br>jcp@pollockinc.com | **On Behalf of The Kroger Co.:**<br>(Intervention filed 07-07-22)<br><br>Kurt J. Boehm, Esq.<br>Jody Kyler Cohn, Esq.<br>Boehm, Kurtz & Lowry<br>36 East Seventh Street, Suite 1510<br>Cincinnati, OH 45202<br>TEL: 513-421-2255<br>FAX: 513-421-2764<br>kboehm@bkllawfirm.com<br>jkylercohn@bkllawfirm.com<br><br>Kevin Higgins<br>Justin Bieber<br>Energy Strategies, LLC<br>215 South State Street, Suite 200<br>Salt Lake City, UT 84111<br>TEL: 801-355-4365<br>FAX: 801-5219142<br>khiggins@energystra.com<br>jbieber@energystrat.com |
| | **On Behalf of Cobb County Chapter Southern Christian Leadership Conference SCLC:**<br>(Intervention filed 07-20-22)<br><br>H. Benjamin Williams<br>Deborah Opie<br>Brionte McCorkle<br>Georgia Conservation Voters Education Fund<br>725 Ponde De Leon Ave FL 2<br>Atlanta, GA 30306<br>TEL: 404-955-7013<br>docben@att.net<br>deborah@gcvoters.org<br>brionte@gcvoters.org |
| | **On Behalf of the Sierra Club:**<br>(Intervention filed 07-25-22)<br><br>Robert Jackson, Esq.<br>Robert B. Jackson, IV, LLC<br>260 Peachtree Street, Suite 2200 |

| | |
|---|---|
| | Atlanta, GA 30303<br>TEL: 404-313-2039<br>rbj4law.@gmail.com<br><br>Isabella Ariza, Esq.<br>Sierra Club<br>50 F Street NW, 8th Floor<br>Washington, D.C. 2001<br>TEL: 857-999-6267<br>Isabella.ariza@sierraclub.org |
| **On Behalf of Concerned Ratepayers of Georgia:**<br>(Intervention filed 07-26-22)<br><br>Ben J. Stockton, PE, MBA<br>Executive Director<br>Concerned Ratepayers of Georgia<br>2230 Allen Road<br>Macon, GA 31216<br>TEL: 404-924-5336<br>encomanager13@gmail.com<br><br>Steven C. Prenovitz, MBA<br>Consultant<br>Concerned Ratepayers of Georgia<br>4295 Amberglade Ct<br>Norcross, GA 30092<br>TEL: 770-448-8978<br>scprenovitz@gmail.com | **On Behalf of Americans for Affordable Clean Energy:**<br>(Intervention filed 07-27-22)<br><br>Newton M. Galloway<br>Terri M. Lyndall<br>Galloway & Lyndall, LLP<br>406 North Hill Street<br>Griffin, GA 30223<br>TEL: 770-233-6230<br>ngalloway@gallyn-law.com<br>tlyndall@gallyn-law.com |
| **On Behalf of Southern Alliance for Clean Energy and the Southface Energy Institute:**<br>(Intervention filed 07-28-22)<br>(Amended filed 08-04-22)<br><br>Bryan Jacob<br>Southern Alliance for Clean Energy<br>1455 Hampton Hill Drive<br>Alpharetta, GA 30022<br>bryan@cleanenergy.org<br><br>Robert B. Baker<br>Robert B. Baker, PC<br>2480 Briarcliff Road, NE, Suite 6<br>Atlanta, GA 30329 | **On Behalf of Utility Management Services:**<br>(Intervention filed 07-29-22)<br><br>Nicole R. Barnett Slaughter<br>Hamlet Law<br>5215 Junction Park Circle, Suite 202<br>Wilmington, NC 28412<br>TEL: 910-777-5995<br>FAX: 910-399-4277<br>nslaughter@hamlet-law.com<br>mhamlet@hamlet-law.com<br>smorin-gage@hamlet-law.com<br>jallen@hamlet-law.com |

| | |
|---|---|
| bobby@robertbbaker.com<br><br>Katie Southworth<br>Southface Energy Institute<br>241 Pine Street, NE<br>Atlanta, GA 30308<br>ksouthworth@southface.org<br><br>William Collier<br>Southface Energy Institute<br>241 Pine Street, NE<br>Atlanta, GA 30308<br>wcollier@southface.org | |
| **On Behalf of Georgia Power & Light (GIPL):**<br>(Intervention filed 08-01-22)<br><br>Jennifer Whitfield<br>Jillian Kysor<br>Southern Environmental Law Center<br>Ten 10th Street, NW, Suite 1050<br>Atlanta, GA 30309<br>TEL: 404-521-9900<br>FAX: 404-521-9909<br>jwhitfield@selcga.org<br>jkysor@selcga.org | **On Behalf of The Commercial Group:**<br>(Intervention filed 08-02-22)<br><br>Alan R. Jenkins<br>Jenkins at Law, LLC<br>2950 Yellowtail Ave.<br>Marathon, FL 33050<br>TEL: 404-729-2037<br>aj@jenkinsatlaw.com |
| **On Behalf of Georgia Solar Energy Association ("GA SOLAR"):**<br>(Intervention filed 08-04-22)<br><br>Donald Moreland<br>Georgia Solar Energy Association<br>1199 Euclid Avenue<br>Atlanta, GA 30307<br>TEL: 770-548-2714<br>FAX: 404-521-9909<br>don@solarcrowdsource.com | **On Behalf of Georgia Coalition of Local Governments:**<br>(Intervention filed 08-04-22)<br>(Amended Intervention filed 08-12-22)<br><br>John R. Seydel<br>City of Atlanta Office of Resilience<br>55 Trinity Avenue<br>Atlanta, GA 30303<br>Jrseydel@atlanta.gov<br>TEL: 470-421-6160<br><br>Alicia Brown<br>City of Savannah<br>Office of Sustainability<br>801 E. Gwinnett Street<br>Savannah, GA 31401 |

| | |
|---|---|
| | alicia.brown@savannahga.gov<br>TEL: 912-651-6838<br><br>David Nifong<br>City of Decatur<br>Department of Public Works<br>2635 Talley Street<br>Decatur, GA 30030<br>TEL: 404-295-2764<br>david.nifong@decaturga.com<br><br>Mike Wharton<br>Athens-Clarke County Unified Government<br>Sustainability Office<br>110 Bray Street<br>Athens, GA 30601<br>TEL: 706-613-3838<br>Mike.Wharton@accgov.com<br><br>H. Gordon Kenna<br>DeKalb County Government<br>Department of Public Works<br>1300 Commerce Drive<br>TEL: 404-371-2000<br>hgkenna@dekalbcountyga.gov |
| **On Behalf of ChargePoint, Inc.:**<br>(Intervention filed 08-05-22)<br><br>Scott F. Dunbar<br>Keyes & Fox LLP<br>1580 Lincoln St., Suite 1105<br>Denver, CO 80203<br>TEL: 949-525-6016<br>sdunbar@keysfox.com<br><br>Alicia Zaloga<br>Keyes & Fox LLP<br>1155 Kildaire Farm Road, Ste.202-203<br>Cary, NC 27511<br>TEL: 919-825-1739<br>azaloga@keyesfox.com<br><br>Matthew Deal<br>ChargePoint, Inc.<br>254 E. Hacienda Ave. | **On Behalf of EVgo Services, LLC:**<br>(Intervention filed 08-05-22)<br><br>Nikhil Vijaykar<br>Jason Keys<br>Alicia Zaloga<br>Keyes & Fox LLP<br>580 California St., 12th Floor<br>San Francisco, CA 94104<br>TEL: 408-621-3256<br>nvijaykar@keyesfox.com<br>jkeyes@keyesfox.com<br>azaloga@keyesfox.com |

| | |
|---|---|
| Campbell, CA 95125<br>TEL: 202-528-5008<br>Matthew.Deal@chargepoint.com<br><br>Jared Ballew<br>ChargePoint, Inc.<br>254 E. Hacienda Ave.<br>Campbell, CA 95125<br>TEL: 515-338-0506<br>Jared.ballew@chargepoint.com | |
| **On Behalf of Cypress Creek renewables, LLC:**<br>(Intervention filed 08-05-22)<br><br>Angie Fiese<br>Cypress Creek Renewables, LLC<br>5310 S. Alston Avenue<br>Building 300<br>Durham, NC 27713<br>TEL: 770-329-4510<br>angie.fiese@ccrenew.com<br><br>Matt Kozey<br>Cypress Creek Renewables, LLC<br>1000 Wisconsin Avenue, Suite 100<br>Washington, DC 20007<br>Matt.kozey@ccrenew.com<br>**On Behalf of Interstate Gas Supply, Inc.:**<br>(Intervention filed 08-05-22)<br><br>J. Brett Newsom<br>Adam Wise<br>Interstate Gas Supply, Inc.<br>3344 Peachtree Road, Suite 2150<br>Atlanta, GA 30326<br>TEL: 404-760-6209<br>brett.newsom@scanaenergy.com<br>adam.wise@scanaenergy.com | **On Behalf of Georgia Solar Energy Industries Association, Solar Energy Industries Association and Vote Solar:**<br>(Intervention filed 08-05-22)<br><br>Scott Thomasson<br>Thomasson Law, LLC<br>1025 Bond Street<br>Macon, GA 31201<br>scott@thomassonlaw.net |

Respectfully submitted this 20th day of October, 2022.

*/s/ Kasey Sturm*

Kimberly (“Kasey”) A. Sturm