Troutman Pepper Hamilton Sanders LLP
600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308-2216

troutman.com

Brandon F. Marzo
brandon.marzo@troutman.com

November 23, 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:

Per the Georgia Public Service Commission's August 5, 2022 Second Amended Procedural and Scheduling Order in the above-referenced docket, enclosed for filing on behalf of Georgia Power Company is the Supplemental Rebuttal Testimony of the Panel of Lee Evans and Larry Legg.

If you have any questions, please call me at 404-885-3683.

Sincerely,

Brandon F. Marzo

Enclosure

SUPPLEMENTAL REBUTTAL TESTIMONY OF

LEE EVANS AND LARRY LEGG

ON BEHALF OF

GEORGIA POWER COMPANY

DOCKET NO. 44280

I. INTRODUCTION

Q. PLEASE STATE YOUR NAMES, TITLES, AND BUSINESS ADDRESSES.

A. Lee Evans, Director of Demand Planning & Analysis for Southern Company Services, Inc. ("SCS"). My business address is 241 Ralph McGill Boulevard N.E., Atlanta, Georgia 30308.

A. Larry T. Legg, Director of Pricing and Rates for Georgia Power Company ("Georgia Power" or the "Company"), 241 Ralph McGill Boulevard N.E., Atlanta, Georgia 30308.

Q. MR. LEGG AND MR. EVANS, DID YOU PREVIOUSLY PRESENT DIRECT AND SUPPLEMENTAL DIRECT TESTIMONY AND EXHIBITS ON BEHALF OF GEORGIA POWER IN THIS PROCEEDING?

A. Yes.

Q. ARE YOU PROVIDING ANY EXHIBITS TO YOUR TESTIMONY?

A. No.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of our testimony is to respond to certain statements and recommendations made by the Georgia Public Service Commission's ("Commission") Public Interest Advocacy ("PIA") Staff and various Intervenors as they relate to the structure and pricing of the Company's Renewable and Nonrenewable Resources ("RNR") tariff. That we may not specifically address a particular PIA Staff or intervenor recommendation should not be construed as support for such position.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Our testimony reaffirms the recommendations in our Supplemental Direct Testimony that the Commission: (1) not expand the RNR monthly netting pilot; and (2) require all future RNR customers to take service under a three-part rate, such as the Company's Time of Use-Residential Demand ("TOU-RD") rate. The monthly netting pilot has served its limited purpose in providing a data set for the Company and Commission to consider whether monthly netting provides a reasonable balance between incentivizing customer-owned behind the meter ("BTM") solar on the RNR tariff without harming non-participating customers. The Company's analysis has confirmed the conclusions reached in other jurisdictions that monthly netting does not comport with sound cost-of-service rate principles and, therefore, can result in costly cross-subsidies as the deployment of BTM solar resources expand on the Company's system. The Company supports customers' choices regarding BTM solar, provided that equitable rate design and compensation structures ensure the costs associated with operating the Company's electric system continue to be fairly recovered from its customers based upon appropriate cost causation principles.

PIA Staff and Intervenor recommendations to implement an alternative compensation mechanism, or minimum bill, or to expand the monthly netting pilot, focus solely on maximizing the benefits to BTM solar participants and increasing BTM solar adoption. The Company does not believe that increased BTM solar penetration alone, without addressing the negative impacts to non-participating customers, is an appropriate measure of success. Adopting these approaches would undermine Georgia's measured approach towards incentivizing the development of renewable energy resources, disproportionally shift costs to non-participating customers, and excessively compensate BTM solar resources at the expense of other customers on the system.

II. <u>STAFF AND INTERVENOR ARGUMENTS</u>

Q. WHAT ARE YOUR CONCLUSIONS REGARDING THE ANALYSIS AND RECOMMENDATIONS PROVIDED BY PIA STAFF AND INTERVENOR WITNESSES?

A. No party credibly rebuts the Company's analysis that a significant cost shift occurs under the RNR tariff. PIA Staff and Intervenors go to great lengths to disregard the cost shift as *de minimis*, re-characterize the shift as "revenue erosion," dismiss the shift as affecting only shareholders, highlight formulaic errors, or suggest that certain unrecognized benefits outweigh the cost shift identified in the Company's analysis. Nevertheless, the fundamental principles contained in the Company's analysis stand—that monthly netting, which compensates customers for intermittent energy they deliver to the grid at the full volumetric portion of the retail rate, allows these customers to shift the costs to build, operate, and maintain the electric system onto non-participating customers. Second, as Dr. Gattie testified, because of these flaws with monthly netting, several other state jurisdictions have recently taken steps to modify monthly netting policy in favor of better cost alignment and recovery. Again, intervenors may argue that monthly netting remains the predominant practice nationwide, or that these policy reversals occurred only after sufficient penetration in the market when the impact on rate structures became unsustainable, but the underlying trend of shifting away from monthly netting at the full retail rate as the preferred policy option in other state jurisdictions appears unopposed. Finally, there can be no doubt that RNR customers will continue to rely upon and be served by the Company's electric system, and PIA Staff and Intervenors rightly do not challenge this unavoidable fact. They simply provide reasons for why they believe BTM resources should not be required to pay for their continued use of and reliance on the system, notwithstanding the cost shift to non-participating customers.

Q. PLEASE SUMMARIZE YOUR UNDERSTANDING OF PIA STAFF ARGUMENTS REGARDING EXTENDING THE MONTHLY NETTING PILOT.

A. PIA Staff does not advocate for an expansion of the monthly netting pilot. Instead, to our understanding, PIA Staff seems to propose that future RNR customers be compensated using one of several alternative pricing methodologies. We note that the prices proposed by PIA Staff for excess energy range from 6.99¢ per kWh to almost 13¢, the extreme variability of which suggests arbitrariness.

PIA Staff's analysis began with a simple comparison of revenue generated from RNR customers compared to the average R customer. From this they determined that RNR customers "provide a substantial level of revenue to the Company." The level of revenue collected from customers provided in isolation does not determine the cost shift or avoided costs from RNR customers. PIA Staff inaccurately claims that "within the ratemaking calculus, we do not distinguish between ... any other criteria that affects individual costs." This is not true. A primary goal of rate design is to reflect the underlying cost-of-service. PIA Staff is correct that "the cost to provide service varies for every single customer," which is why rates are designed to reflect a population of customers on a particular rate. However, it is incorrect to assume that because one cannot account for every individual nuance of customer usage characteristics and circumstances between customers that the Company should not develop cost-based rates. Further, when considering a policy decision that might promote a certain technology or usage characteristic, it is the Company's responsibility to inform the Commission of the cost shift and disproportionate impact to non-participants.

PIA Staff then offers possible alternatives to the value of excess generation exported to the grid. PIA Staff conveniently ignores the framework to value excess generation from BTM solar systems that has been in place since 2017 and was recently reviewed and reaffirmed in both the Company's Avoided Cost Methodology Review in Docket Nos. 4822, 16573, and 19279 and the 2022 IRP in Docket No. 44160. PIA Staff's analysis assumes and provides value for components neither approved nor recognized in the Company's Renewable Cost Benefit ("RCB") Framework as applied to BTM solar systems.

The comparison of the value of a BTM system to Company-owned solar facilities is fraught with issues. Georgia Power's solar facilities were constructed such that the costs were projected to be below avoided cost over the life of the project to benefit customers. This is consistent with how the RCB Framework compensates RNR customers today – based on the Company's Solar Avoided Energy Costs. To pay RNR customers according to the RCB Framework and then add a differential based on a certain point in time of a 30-year project, would artificially inflate the benefits.

PIA Staff's second analysis is even more troubling. Table 3 of PIA Staff's testimony shows that 1,473 bills had zero or negative billed kilowatt hours ("kWh") under RNR monthly netting. Because these customers were billed for zero kWh usage, these customers did not pay any of the volumetric charges under the R rate, which was designed to recover all of the Company's generation, transmission, and most of the distribution costs for the infrastructure that delivered energy to their home. By not paying any volumetric charges in those months, these customers are shifting that entire cost to non-participants. PIA Staff's second analysis contends that RNR customers should not only avoid volumetric charges when they are not generating, but also be paid as if they provided actual transmission and generation capacity to other customers. This stacking of subsidies does not recognize actual avoided costs – only the Commission-approved RCB Framework does that.

Q. DOES PIA STAFF'S ANALYSIS ALTER THE COMPANY'S RECOMMENDATIONS REGARDING THE USE OF THREE-PART RATES FOR RNR CUSTOMERS?

A. No. The Company continues to recommend that the Commission require all customers who enroll in the RNR tariff on or after January 1, 2023 take service under a three-part rate, such as the Company's TOU-RD or Smart Usage rate or an equivalent Commercial or Industrial rate. Such rates provide more accurate price signals, are better aligned with our cost to serve, and mitigate the majority of the underlying cost shift revealed in the Company's analysis. Continuing to compensate BTM solar customers who take service on a volumetric rate, whether via monthly netting or instantaneous netting, creates cost shifts to non-participating customers that will continue to expand over time as more and more BTM solar resources interconnect to the system.

Q. HOW DO YOU RESPOND TO THE RECOMMENDATIONS FROM MANY INTERVENORS THAT THE COMMISSION SHOULD LIFT THE CAP FOR MONTHLY NETTING?

A. Lifting the cap for monthly netting would severely harm non-participating customers by expanding the disproportionate cost shift associated with monthly netting. As described in

the Supplemental Testimony of Dr. Gattie, similar to the experiences in California and other jurisdictions, the cost shift grows as penetration levels increase, leading to the need for regulatory or legislative revisions to better balance the interests of BTM solar developers and customers. The Company recommends the Commission take advantage of these lessons learned in other jurisdictions now to avoid the inevitable pitfalls of over subsidizing BTM resources.

Q. HAVE PIA STAFF OR THE INTERVENORS CREDIBLY CONTRADICTED THE EXISTENCE OF A COST SHIFT RESULTING FROM MONTHLY NETTING?

No. PIA Staff and Intervenors have argued that the cost shift is small, outweighed by supposed benefits, or should be accepted as a means of achieving broader policy goals, but they have not disproven the Company's demonstration that a cost shift occurs when analyzing all appropriate costs and benefits. PIA Staff's compensation proposals and various Intervenors' minimum bill proposals tacitly acknowledge this fact, in that they seek to mitigate some, but not all, of the cost shift inherent in the RNR tariff's current rate design. The primary fault with monthly netting as an accounting construct is that it enables a customer to zero or net out its usage during the billing period despite the fact that the customer actually relied upon and was served by the system during that same billing period. A customer that consumes electricity from Georgia Power's system should bear responsibility for the cost of such usage. But monthly netting allows an RNR customer that consumes electricity from the Company to still avoid all volumetric charges associated with a monthly bill, and a primarily volumetric-based rate such as the R rate magnifies this problem. Fundamental cost-based rate design principles obligate the Company to address this problem. This problem is also why, as Dr. Gattie testified, many states have modified their monthly netting policies and adopted alternative approaches to compensate BTM resources to address this fundamental problem posed by monthly netting.

Q. HOW DO YOU RESPOND TO THE CHARACTERIZATIONS THAT GEORGIA POWER'S STUDY DOES NOT SHOW A COST SHIFT TO RESIDENTIAL CUSTOMERS BUT RATHER A SHIFT TO COMPANY SHAREHOLDERS?

A. This characterization is inaccurate. While "revenue erosion" could result in less revenue being collected in the immediate short term, rates will ultimately be set to recover these costs. As the Company recovers less revenue from RNR customers, non-RNR customers will increasingly bear the burden of recovering those costs.

Intervenors acknowledge that some other party must assume an RNR customer's share of fixed costs to support the system that RNR customers will continue to rely upon. We find it curious that these Intervenors seem fine with, under their own characterization, having a rate design that deliberately under-recovers the very revenue requirement set in this case. The Commission should reject such short-term thinking. Should monthly netting continue, every time the Company updates its forecasts and redesigns prices within the rate case process, more costs will be shifted to non-participating customers.

Q. PLEASE RESPOND TO THE CLAIMS OF ADDITIONAL BENEFITS OF BTM GENERATION ASSERTED BY PIA STAFF AND INTERVENORS.

A. Many Intervenors suggest that the Commission expand monthly netting for policy reasons that go far beyond the scope of a traditional cost-of-service rate case, such as concerns related to enhancing employment, environmental justice, or climate impacts. These considerations are not components of avoided cost and should not be included in compensation to BTM customers.

With respect to transmission, distribution and other system benefits, all appropriate benefits have been included in the Company's analysis. Both PIA Staff and Intervenors fail to acknowledge that the Commission already considers the myriad of benefits for solar resources within the Company's RCB Framework. To the extent these benefits exist, the Commission has already identified and quantified these benefits. RNR customers receive compensation for these benefits through the Company's Solar Avoided Energy Cost Rate currently paid to instantaneous netting customers for excess energy pushed back onto the grid.

Q. DO YOU AGREE WITH PIA STAFF'S AND INTERVENORS' ARGUMENTS REGARDING CAPACITY BENEFITS?

A. No. Consistent with the Commission's determination in the Avoided Cost Methodology proceedings and reaffirmed in the recent IRP ruling, generation, transmission, and distribution capacity benefits should not be included in compensation paid to RNR customers. According to PIA Staff and Intervenors, because excess energy produced by the customer-generator is likely to remain within the Company's distribution system, this excess energy does not rely on the Company's transmission system. In GSEIA's analysis for example, GSEIA analyzes and ascribes value to both "inflow" and "outflow" energy to conclude that BTM solar systems provide more system benefits than the amount of unrecovered revenue avoided by RNR customers. This analysis assumes the Company can realize these benefits by downsizing transmission and distribution system investments in amounts commensurate with GSEIA's analysis. The only true result of GSEIA's analysis is that it confirms that current costs are shifted to non-participating customers through GSEIA's proposed reallocation. PIA Staff and Intervenors focus solely on the excess energy produced by the customer, and do not acknowledge the integrated nature of the transmission and distribution infrastructure that is required to serve the same RNR customer at times when the customer's BTM solar system is not generating or is not fully meeting the RNR customer's energy needs.

It is also inappropriate to include generation capacity benefits in compensation to RNR customers. This issue has been litigated before and affirmed by this Commission several times. The Company cannot plan for or rely upon BTM resources to ensure system reliability because the customer is under no contractual obligation to generate, and even if they happen to be generating and delivering excess energy to the system, their energy is not required to be available in the future and thus is not included in generation capacity planning. The Company has an obligation to reliably serve customers, which requires planning for firm, reliable resources available to meet peak demand. BTM systems do not meet those requirements and, therefore, do not provide generation capacity avoidance value. Thus, BTM resources—although providing an alternative source of energy—do not provide any capacity-related benefits to the system.

Q. ARE INTERVENORS' MINIMUM BILL PROPOSALS SUFFICIENT TO ADDRESS THE COST SHIFT?

A. No. The minimum bill proposals by Intervenors are not sufficient to address the cost shift. In recommending a minimum bill, Intervenors implicitly acknowledge that some amount of non-volumetric fixed charges are appropriate to ensure RNR customers pay their fair share of costs. However, the minimum bills proposed are essentially only equal to the Company's customer-related costs for residential customers that is determined in the Cost of Service Study ("COSS"). As previously established, RNR customers continue to rely upon Georgia Power's system to serve their electric service needs and to receive any excess energy the customer produces. As a result, setting a minimum bill that only captures the customer-related portion of costs would continue to enable RNR customers to utilize the electric infrastructure at a reduced price and shift these demand-related costs to non-participants.

III. THE COMPANY'S ANALYSIS

Q. HOW DO YOU RESPOND TO THE CRITICISMS BY PIA STAFF THAT THE COMPANY DID NOT PROVIDE SUFFICIENT COST INFORMATION TO SUPPORT ITS RECOMMENDATIONS AND INTERVENOR COMPLAINTS THAT THE COMPANY'S ANALYSIS IS NOT COST-BASED?

A. First, the Company presented its analysis within the context of its overall base rate case, which includes a holistic look at all the Company's costs as supported by a comprehensive COSS. As such, all the Company's cost information is available and transparent. Additionally, the Company provided comprehensive cost data in response to data requests based on our Supplemental Direct Testimony. The analysis provided a standard, comprehensive non-fuel cost-benefit analysis for RNR customers and non-participants. The Company only included non-fuel costs and benefits in its analysis as part of this base rate case but there are additional fuel benefits and savings from RNR customers reflected in the Fuel Cost Recovery Docket. The results in Figure 3 of our Supplemental Direct Testimony show non-fuel cost shifts resulting from the R tariff and RNR monthly netting. The data also shows the non-fuel Avoided Energy Savings/Benefits generated by these

customers are derived from the Company's filed COSS in this case and is consistent with the Commission's determination of Solar Avoided Energy Costs in the Avoided Cost Methodology proceedings and reaffirmed in the Company's 2022 IRP. Unlike PIA Staff and Intervenor analyses, the Company's cost analysis does not presume benefits and results that contradict the Commission's previous decisions on this matter. The Company's analysis uses the available data specific to RNR customers to demonstrate the cost shift caused by the RNR rate structure in order to provide the Commission with the necessary information to inform its decision-making.

Q. IS A SEPARATE COSS NECESSARY FOR THE COMMISSION TO EVALUATE THE MONTHLY NETTING PILOT?

A. No. A COSS, such as the one GSEIA references, would only validate the cost shift and show what rates/rate groups the costs were shifted onto. This 'after the fact' analysis does not show avoided costs, just a reallocation of costs already incurred. Additionally, GSEIA ignores that treatment of capacity benefits has repeatedly been litigated and reaffirmed in Commission proceedings. The appropriate analysis is shown in our Supplemental Direct Testimony and demonstrates a disproportionate cost shift to non-participants today.

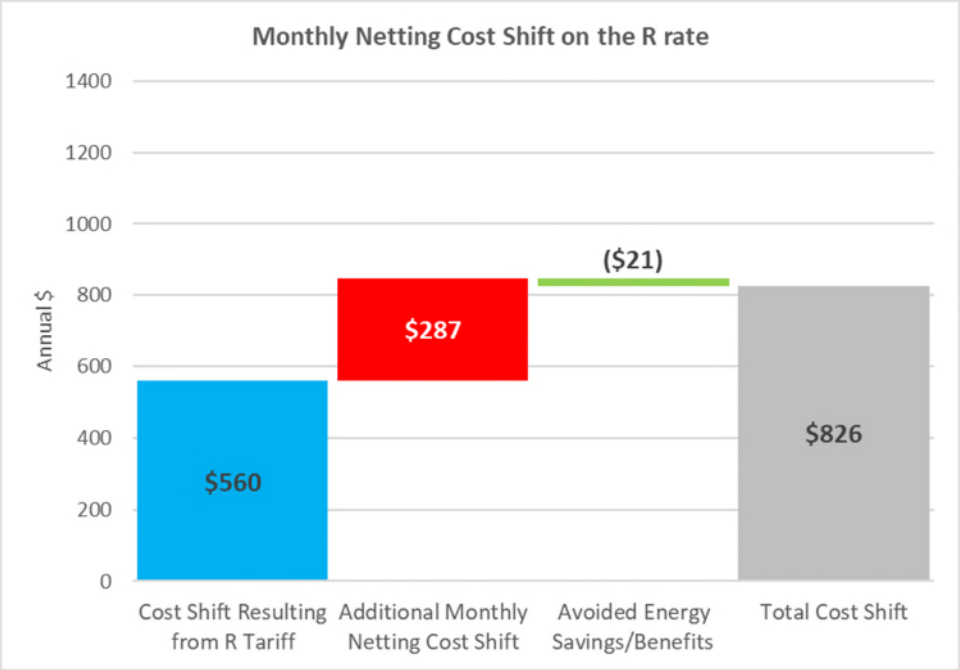
Q. PLEASE EXPLAIN THE COMPANY'S ACTIONS FOLLOWING THE IDENTIFICATION OF AN INADVERTENT ERROR IN ITS CALCULATIONS OF THE COST SHIFT ANALYSIS INCLUDED IN YOUR SUPPLEMENTAL DIRECT TESTIMONY.

A. The Company has confirmed an error in the calculation of the cost shift associated with the monthly netting pilot that was identified in the testimonies intervening parties filed on November 18, 2022. This formulaic error resulted in an incorrect overstatement of the cost shift in the Company's Supplemental Direct Testimony. The Company has corrected this mistake and further conducted a thorough review of all calculations within the cost shift analysis, which resulted in two additional minor corrections to the cost shift results. The Company filed this information with the Commission on November 21, 2022 as an errata.

Q. DID THE CORRECTION TO THE STUDY CHANGE THE COMPANY'S RECOMMENDATION?

A. No. Although the updates had the net effect of reducing the results of the cost shift analysis for participants on the R rate, the cost shift remains a significant burden that is transferred to all other customers. In total, the annual cost shift included in the Supplemental Direct Testimony is recalculated from $1,356 to $826 for the average monthly netting participant on the R tariff. The vast majority of the change is captured in the recalculation of the cost shift resulting from the R tariff for the energy consumed behind the meter; however, there were small changes captured in the calculation of the monthly netting cost shift as well. Notwithstanding these updates, the cost shift analysis continues to support our Supplemental Direct Testimony and our recommendations remain the same. Figure 1 below demonstrates this cost shift using the corrected analysis.

Figure 1



IV. RNR RATE STRUCTURE

Q. HOW DO YOU RESPOND TO THE RECOMMENDATIONS BY PIA STAFF AND INTERVENORS THAT THE R RATE SHOULD REMAIN THE DEFAULT RATE FOR RNR CUSTOMERS?

A. We disagree. As we stated in our Supplemental Direct Testimony, the Company is proposing to move existing RNR customers onto the TOU-RD tariff to achieve two objectives: (1) to mitigate the cost shift identified in the Company's analysis; and (2) to ensure our rates most accurately reflect the cost-of-service and cost-causation principles. The level of cost shift under the R rate is higher because the R rate does not appropriately match the collection of revenues with how the Company incurs its costs. By continuing with the R rate, this cost shift will only intensify as the number of RNR customers increases.

Q. WHAT ARE PIA STAFF AND INTERVENOR OBJECTIONS TO THE TOU-RD RATE?

A. As we understand it, PIA Staff and Intervenor objections do not appear to be motivated by rate design principles, but rather with concerns regarding the reduced level of payment some RNR customers would receive under TOU-RD. Intervenors appear to favor the R rate because this rate maximizes the level of incentives provided to the BTM solar market, without regard to the consequences for non-participating customers or cost-causation principles. Intervenors have failed to demonstrate that the TOU-RD tariff does not appropriately recover costs reasonably and fairly. Instead, these arguments appear reactive to the potential for the TOU-RD rate to mitigate the current subsidy available under the R tariff and reduce RNR customers' savings opportunities.

V. OTHER ISSUES

Q. DOES THE COMPANY AGREE WITH GSEIA'S RECOMMENDATION THAT THE COMMISSION SHOULD CONSIDER BILL AMOUNTS RATHER THAN RATES?

A. No. The Commission should consider the Company's rates, rather than electric bills, as the appropriate metric. First, the Commission has jurisdiction over the rates the Company charges, not how much electricity Georgia Power's customers use. Second, a customer with high usage but a low rate can pay a higher electric bill than a customer with a higher rate but lower usage. Finally, Georgia's measured approach to renewable energy policy has helped keep Georgia's electric rates lower than many states with higher levels of rooftop solar penetration.

VI. CONCLUSION

Q. IN LIGHT OF ALL OF THE ABOVE, WHAT SHOULD THIS COMMISSION DO TO MITIGATE THE COST SHIFT THAT OCCURS WITH MONTHLY NETTING AND INSTANTANEOUS NETTING?

A. The monthly netting pilot causes a disproportionate cost shift to non-participating customers. As such, it should remain capped at 5,000 customers. Additionally, given the cost shift that is also inherent in the Company's instantaneous netting program, the Company recommends that the Commission require all customers who enroll in the RNR tariff on or after January 1, 2023, to take service under a three-part rate, such as the Company's TOU-RD rate, to mitigate the disproportionate cost shift to non-participating customers. These recommendations appropriately balance the need to protect non-participating customers while continuing to support the growth of BTM resources.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing SUPPLEMENTAL REBUTTAL TESTIMONY OF THE PANEL OF LEE EVANS AND LARRY LEGG ON BEHALF OF GEORGIA POWER COMPANY IN DOCKET NO. 44280 upon all parties listed below via electronic service or by hand delivery and addressed as follows:

Sallie Tanner Executive Secretary Georgia Public Service Commission 244 Washington Street, SW Atlanta, GA 30334 stanner@psc.ga.gov	Preston Thomas Georgia Public Service Commission 244 Washington Street, SW Atlanta, GA 30334 pthomas@psc.state.ga.us
Charles B. Jones, III Lloyd Avram G. L. Bowen, III Georgia Association of Manufacturers The Hurt Building 50 Hurt Plaza, Suite 985 Atlanta, GA 30303 cjones@gamfg.org lavram@gamfg.org rbowen@gamfg.org	Jeffry C. Pollock J. Pollock Incorporated 12647 Olive Blvd., Suite 585 St. Louis, Missouri 63141 jcp@jpollockinc.com
Liz Coyle Georgia Watch 55 Marietta Street, Suite 903 Atlanta, GA 30303 lcoyle@georgiawatch.org	Kurt J. Boehm Jody Kyler Cohn Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202 kboehm@bkllawfirm.com jkylercohn@bkllawfirm.com
Kevin Higgins Justin Bieber Energy Strategies, LLC 215 South State Street, Suite 200 Salt Lake City, UT 84111 khiggins@energystrat.com jbieber@energystrat.com	Emily W. Medlyn General Attorney U.S. Army Legal Services Agency ELD Division 9275 Gunston Road Fort Belvoir, VA 22060-4446 emily.w.medlyn.civ@army.mil

Jim Clarkson Resource Supply Management 135 Emerald Lake Rd Columbia, SC 29209 803-312-3500 jclarkson@rsmenergy.com	Robert Jackson Robert B. Jackson IV, LLC 260 Peachtree Street Suite 2200 Atlanta, GA 30303 rbj4law@gmail.com
Isabella Ariza Sierra Club 50 F Street NW, 8th Floor Washington, D.C.20001 Isabella.ariza@sierraclub.org	Ben J. Stockton Concerned Ratepayers of Georgia 2230 Allen Road Macon, GA 31216 encomanager13@gmail.com
Steven Prenovitz Concerned Ratepayers of Georgia 4295 Amberglade Court Norcross, GA 30092 scprenovitz@gmail.com	Newton M. Galloway Terri M. Lyndall Galloway & Lyndall, LLP 406 North Hill Street Griffin, Georgia 30223 ngalloway@gallyn-law.com tlyndall@gallyn-law.com
L. Craig Dowdy Steven L. Jones 1600 Parkwood Circle, Suite 200 Atlanta, GA 30339 cdowdy@taylorenglish.com sjones@taylorenglish.com	Bryan Jacob Southern Alliance for Clean Energy 1455 Hampton Hill Drive Alpharetta, GA 30022 bryan@cleanenergy.org
Katie Southworth Southface Energy Institute 241 Pine Street, NE Atlanta, GA 30308 ksouthworth@southface.org	William Collier Southface Energy Institute 241 Pine Street, NE Atlanta, GA 30308 wcollier@southface.org
Nicole R. Barnett Slaughter Hamlet Law 5215 Junction Park Circle Suite 202 Wilmington, NC 28412 nslaughter@hamlet-law.com mhamlet@hamlet-law.com smorin-gage@hamlet-law.com jallen@hamlet-law.com	Jennifer Whitfield Jillian Kysor Southern Environmental Law Center Ten 10th Street Suite 1050 Atlanta, GA 30309 jwhitfield@selcga.org jkysor@selcga.org

Alan R. Jenkins Jenkins at Law, LLC 2950 Yellowtail Ave. Marathon, FL 33050 aj@jenkinsatlaw.com	Donald Moreland Georgia Solar Energy Association 1199 Euclid Avenue Atlanta, GA 30307 don@solarcrowdsource.com
John R. Seydel City of Atlanta Office of Resilience 55 Trinity Avenue Atlanta, GA 30303 Jrseydel@atlantaga.gov	Alicia Brown City of Savannah, Office of Sustainability 801 E. Gwinnett Street Savannah, GA 31401 alicia.brown@savannahga.gov
David Nifong City of Decatur, Department of Public Works 2635 Talley Street Decatur, GA 30030 david.nifong@decaturga.com	Mike Wharton Athens-Clarke County Unified Government, Sustainability Office 110 Bray Street Athens, GA 30601 Mike.Wharton@accgov.com
Nina R. Hickson City of Atlanta 55 Trinity Avenue, SW, Suite 5000 Atlanta, GA 30303 NinaRHickson@AtlantaGa.Gov	Scott Thomasson Thomasson Law, LLC 1025 Bond Street Macon, GA 31201 scott@thomassonlaw.net
Jeffrey C. Stair 3764 Mill Creek Ct. Atlanta, GA 30341 Jcs3764@comcast.net	Angie Fiese Cypress Creek Renewables, LLC 5310 Alston Avenue Building 300 Durham, North Carolina 27713 Angie.fiese@ccrenew.com
Matt Kozey Cypress Creek Renewables, LLC 1000 Wisconsin Avenue, Suite 100 Washington, D.C. 20007 Matt.kozey@ccrenew.com	Nikhil Vijaykar Jason Keyes Alicia Zaloga Keys & Fox LLP 580 California St, 12th Floor San Francisco, CA 94104 nvijaykar@keyesfox.com jkeyes@keyesfox.com azaloga@keyesfox.com

Scott F. Dunbar Keyes & Fox LLP 1580 Lincoln Street, Suite 1105 Denver, CO 80203 sdunbar@keyesfox.com	Matthew Deal Jared Ballew ChargePoint, Inc. 254 Hacienda Avenue Campbell, CA 95125 Matthew.Deal@chargepoint.com Jared.ballew@chargepoint.com
William Bradley Carver, Sr. Joel L. McKie Hall Booth Smith, P.C. 191 Peachtree Street, NE, Suite 2900 Atlanta, GA 30303 bcarver@hallboothsmith.com jmckie@hallboothsmith.com	J. Brett Newsom Adams Wise Interstate Gas Supply, Inc. 3344 Peachtree Road, Suite 2150 Atlanta, GA 30326 Brett.newsome@scanaenergy.com Adam.wise@scanaenergy.com
H. Gordon Kenna DeKalb County Government Department of Public Works 1300 Commerce Drive Decatur, GA 30030 hgkenna@dekalbcountyga.gov	Kimberly ("Kasey") A. Sturm Weissman PC One Alliance Center, Fourth Floor 3500 Lenox Road Atlanta, GA 30326 kaseys@weissman.law
Peter J. Andrews Metropolitan Atlanta Rapid Transit Authority 2424 Piedmont Road, NE Atlanta, GA 30324 pandrews@itsmarta.com	Simon Mahan Southern Renewable Energy Assoc. 11610 Pleasant Ridge Road, Suite 103 Little Rock, AR 72223 simon@southernwind.org
Ms. Deborah Opie Georgia Conservation Voters 725 Ponce De Leon Ave, FL2 Atlanta, GA 30306 deborah@gcvoters.org	

This 23rd day of November 2022.



Brandon F. Marzo
Attorney for Georgia Power Company

TROUTMAN PEPPER HAMILTON SANDERS LLP
Bank of America Plaza
600 Peachtree St., N.E.
Suite 3000
Atlanta, Georgia 30308-2216
(404) 885-3000