KEYES&FOX LLP

Via Alternative Electronic Filing

December 8, 2022

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, 1st Floor
Atlanta, GA 30334

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

Dear Executive Secretary Tanner:

Please find enclosed an electronic version of EVgo's Post-Hearing Brief and Proposed Order for filing in Docket No. 44280.

Thank you for your consideration.

Sincerely,



Nikhil Vijaykar
Keyes & Fox LLP
580 California Street, 12th Floor
San Francisco, CA 94104
Tel.: 408-621-3256
E-mail: nvijaykar@keyesfox.com

Counsel to EVgo Services, LLC

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In re: Georgia Power Company's 2022 Rate Case	))	Docket No. 44280

EVGO'S POST-HEARING BRIEF AND PROPOSED ORDER

December 8, 2022

TABLE OF CONTENTS

I. INTRODUCTION 1

II. ARGUMENT 3

A. THE COMMISSION SHOULD DIRECT GEORGIA POWER TO DISCONTINUE ITS UNREASONABLE AND ARBITRARY PRACTICE OF DISQUALIFYING THIRD-PARTY OWNER-OPERATORS FROM ITS MAKE READY PROGRAM AND DIRECT THE COMPANY TO CONTINUE PROVIDING SERVICE TO THIRD-PARTY OWNED CHARGERS CONSISTENT WITH ITS LEGAL OBLIGATIONS. 3

B. THE COMMISSION SHOULD ADOPT REASONABLE GUARDRAILS TO ENSURE THAT GEORGIA POWER'S COMMUNITY CHARGING PROGRAM DOES NOT UNDERMINE THE COMPETITIVE CHARGING MARKET. 8

C. THE COMMISSION SHOULD DIRECT THE COMPANY TO MAKE THE CIEV TARIFF AVAILABLE TO EXISTING CHARGING STATIONS THAT OTHERWISE MEET THE TARIFF'S ELIGIBILITY CRITERIA. 11

III. CONCLUSION 13

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In re: Georgia Power Company's 2022 Rate Case	))	Docket No. 44280

EVGO'S POST-HEARING BRIEF AND PROPOSED ORDER

I. INTRODUCTION

In this proceeding, Georgia Power Company advances several proposals aimed at "support[ing] the growth of electric transportation in Georgia."[1] Those proposals include investments in the buildout of electrical infrastructure necessary to support electric vehicle (EV) charging (otherwise known as the "Make Ready Program"); investments in Company-owned EV chargers (otherwise known as the "Community Charging Program"); and an attractive new rate for commercial EV charging (the "Charge-It Electric Vehicle" or "CIEV" tariff). At a high level, EVgo Services LLC (EVgo) is generally supportive of these proposals. The record demonstrates that the Company's proposed EV-related infrastructure investments and rate design have the potential to benefit not only participants but all Georgia Power customers.

EVgo's chief concern, however, is that the Company's fine print (its public Make Ready Program Terms and Conditions, as well as its internal Make Ready Program Standards—both produced through discovery in this proceeding) arbitrarily picks winners and losers from the several emerging business models in Georgia's nascent EV charging market. Rather than allowing all EV charging facilities to participate in and benefit from the Make Ready Program, the Company's eligibility requirements *exclude* EV charging stations owned and operated by third-party EV service providers (EVSPs) on the premises of other commercial customers.

[1] Rebuttal Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson on behalf of Georgia Power Company at 21.

Worse still, whereas the Company has historically provided electric service to third-party EVSPs (as the customer of record for an EV charging station), the Company's internal documents suggest that it will *no longer offer electric service* to charging stations owned and operated by an EVSP. The Company does not offer any direct or rebuttal testimony acknowledging—let alone justifying—its unlawful and discriminatory approach.

The Company's unexplained insistence on titling the playing field in the competitive EV charging market unfairly privileges Georgia Power while undermining customer choice. That is because Georgia Power's eligibility requirements force commercial customers who want to host an EV charging station to either host a Georgia Power-owned site, or (b) take on the burden of owning and operating a charging site, but do not allow those customers to host a site owned and operated by a third-party EVSP. Moreover, Georgia Power's restrictive eligibility requirements undermine its own Make Ready Program. Third-party owner-operators have deep technical experience regarding the installation, operation and maintenance of EV charging stations and are responsible for roughly three quarters of the public EV fast charging stations deployed nationally today.[2] The Company's approach would prohibit participation for the predominant method of deploying DCFC nationally to the detriment of the success of the Make Ready program as well as Georgia Power's greater goals to promote transportation electrification in its service territory.

EVgo therefore submits this post-hearing brief pursuant to the Commission's Second Amended Procedural and Scheduling Order and the Commission's Rule 515-2-1-.04 to request that the Commission direct the Company to provide service to third-party EVSPs and allow those owner-operators, who are just like any other commercial customer, to participate in the Make Ready Program. EVgo also recommends certain modest modifications to the Company's

[2] Direct Testimony of Colin Murchie on behalf of EVgo at 12.

Community Charging program and CIEV tariff proposals in order to ensure that those programs are fair and reasonably complement the competitive charging market.

II. ARGUMENT

A. The Commission Should Direct Georgia Power to Discontinue Its Unreasonable and Arbitrary Practice of Disqualifying Third-Party Owner-Operators From Its Make Ready Program and Direct the Company to Continue Providing Service to Third-Party Owned Chargers Consistent with its Legal Obligations.

"Make-ready" infrastructure refers to the electrical equipment necessary to operate an EV charging station, including sub-panels, main panels, conductors, wiring, transformers and other equipment.[3] Utility investments in make-ready infrastructure can bolster market deployment of charging stations because make-ready infrastructure often represents one of the biggest financial hurdles to installing an EV charging station. Further, make-ready investments not only support EV charging station owners and the EV drivers who use those stations, they can also benefit all ratepayers. That is because EV loads can put downward pressure on rates for all customers; indeed, Georgia Power's Ratepayer Impact Measure testing indicates that its Make Ready Program will do so.[4] Commissions across the country have approved utility make-ready programs in order to leverage a combination of utility and private capital investment in charging infrastructure to provide ratepayer benefits.[5]

Georgia Power implemented a Make Ready Infrastructure Program following its 2019 rate case. In this proceeding, Georgia Power proposes to substantially expand that program and

[3] Direct Testimony of Colin Murchie on behalf of EVgo at 9; Rebuttal Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson on behalf of Georgia Power Company at 22.
[4] Rebuttal Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson on behalf of Georgia Power Company at 23.
[5] Direct Testimony of Colin Murchie on behalf of EVgo at 10.

invest $27 million per year between 2023 and 2025 ($81 million in total) in make-ready infrastructure.[6] EVgo supports the Company's proposal to expand its Make Ready Program.

However, while Georgia Power states that its program is available to all existing Georgia Power commercial and industrial customers,[7] Georgia Power does not and will not offer make-ready funding to third-party EV charging service providers that own and operate a charging station on a site host's premises, even if that third-party owner-operator is a Georgia Power "customer of record" (meaning the entity paying the utility bill).[8] Further, Georgia Power indicates that it will no longer *allow* third-party owner-operators to be the customer of record for an EV charging station. Its internal standards document states: "Georgia Power will not establish a new account in a charging company's name that is located on a Georgia Power customer's premise. The billing account must be in the name of the premise customer."[9]

The Commission should reject Georgia Power's unlawful approach towards third-party owner-operators. As a threshold matter, Georgia Power has no authority to pick and choose customers or discriminate against certain customers. *Ga. Pub. Serv. Comm'n v. Georgia Power Co.*, 182 Ga. 706 (1936). As a regulated monopoly electric supplier, it is prohibited from having or applying any service rule or regulation which unreasonably discriminates between classes of consumers or between members within a class of consumers. O.G.C.A. § 46-3-11(a); *see also* Ga. Comp. R. & Regs. r. 515-3-1-.02 (prohibiting unjust discrimination by utilities in the conduct of their business). Georgia Power has an obligation to serve all customers desiring to take service on a non-discriminatory basis and may not disallow third-party charging companies

[6] Rebuttal Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson on behalf of Georgia Power Company at 22.
[7] Direct Testimony of Colin Murchie on behalf of EVgo at 11.
[8] *Id*.
[9] *Id*. at 11-12 (referencing Georgia Power Company response to STF-LA-6-20, Attachment B at 2).

from taking service simply because it would prefer the billing account to be in the name of a different, non-EVSP commercial customer. The Commission should direct Georgia Power to continue providing service to third-party owned chargers consistent with its legal obligations.

Further, Georgia Power's unwillingness to allow third-party owner operators to participate in its Make Ready Program is both discriminatory and anti-competitive. Again, under Georgia law and basic principles of utility regulation, the Company *may not* apply program eligibility requirements that discriminate against certain EV charger owners while putting other EV charger owners at an advantage. O.C.G.A. § 46-3-11(a). Moreover, the Company's approach would effectively preference its own chargers, because commercial customers seeking to host, but not own or operate, an EV charger would have no option but to install a Georgia Power-owned charger.

In addition to being discriminatory and plainly anti-competitive, the Company's insistence on excluding third-party owner-operators is unjust and unreasonable, for at least four reasons. First, the Company's eligibility requirements inappropriately put the Company's "thumb on the scale" of the competitive market. Those requirements effectively disadvantage one EV charging business model (the owner-operator model) in an emerging market that features a range of business models. Thus, while the Company *purports* to support a competitive charging market, the Company's failure to establish business model-agnostic eligibility requirements have exactly the opposite effect.

Second, the Company's approach is arbitrary and has no record basis. Whether the customer of record is a site host, a third-party charging provider, an owner-operator of EV charging, or any other entity involved in a public EV charging arrangement should have no bearing on whether a charging station is eligible for funding for make-ready infrastructure

through the Company's program. The Company offers no rationale for linking Make Ready Program eligibility to the charging station's ownership arrangement; indeed, none exists.

Third, the Company's approach makes it an outlier to all other make-ready programs nationally. As EVgo witness Murchie observed, none of the many other utilities across the country implementing a make-ready program exclude third-party owner-operators as Georgia Power proposes to do.[10] EVgo presented examples of typical make ready program requirements approved and implemented in other states, which allow any applicant (the site host or an EV charging owner-operator) to own, lease, or operate EV charging equipment at the site host premise, and separately meter all load associated with charging equipment.[11]

Finally, the Company's approach undermines its own Make Ready Program and denies its customers choice. Georgia Power's commercial customers seeking to install public EV charging sites must own and operate those sites in order to benefit from the Make-Ready program, even if they have neither the expertise nor interest in doing so.[12] Customers uninterested in the complexities of owning, operating, financing, and maintaining a DCFC station would have no other choice but to host a Georgia Power-owned charger (implicating the competitive concerns described above). The Company's approach would therefore tie its own customers' hands and lock out a market segment that is responsible for approximately three quarters of the public fast charging deployed nationally today, for no apparent reason.

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[10] *Id*. at 13; *see also* EVgo Exhibit 1 (Xcel Energy EV charging program terms and conditions in New Mexico and Colorado).
[11] Direct Testimony of Colin Murchie on behalf of EVgo at 13-14, EVgo Exhibit 1.
[12] *See* Direct Testimony of Colin Murchie on behalf of EVgo at 21 n.43, (explaining that "[w]hile electricity remains the largest cost driver, the full stack of costs also includes equipment at the early stage of a technology adoption curve, construction and installation costs, ongoing networking and maintenance costs, among other factors.")

The Commission can easily avoid this unnecessary and harmful outcome: it can and should direct the Company to expressly allow third-party owner-operators to participate in the Make Ready Program, as has been done in countless EV Make Ready programs before it. This would ensure that the program is business-model agnostic and enables a level playing field. In the interest of certainty and transparency, the Commission should direct the Company to clearly state—in the Make Ready Program's rules and requirements—that the applicant must be the "customer of record" for the EV charging station, and that the customer of record can be the site host or the EV charging service provider that owns and operates the charging station. Further, the Commission should direct the Company to clarify—in the Make Ready Program's rules and requirements—that it will install a separate meter for the EV charging station if requested, and, to the extent that the EV charging station is owned and operated by an EVSP, establish a new account for that EV charging station.

To ensure transparency and that both the Commission and prospective applicants have a clear idea of the Company's updated Make Ready Program rules and requirements, the Commission should direct the Company to provide those updated rules and requirements as a compliance filing within 30 days of the final Order in this proceeding.[13] Further, in the interest of fairness, the Commission should direct the Company to allocate funds to make-ready program

[13] When Georgia Power's Make Ready Program was initially approved in its 2019 rate case, the Company failed to transparently disclose its program rules and requirements to the Commission and prospective applicants, leading program applicants to (erroneously) believe that the program's eligibility requirements resembled those that are typical of other make-ready programs across the country. The Commission should seek to avoid any confusion over program rules and requirements this time around.

applications already received by the Company that meet the updated Make Ready Program rules and requirements. [14]

B. The Commission Should Adopt Reasonable Guardrails to Ensure that Georgia Power's Community Charging Program Does Not Discourage Investments by the Competitive Charging Market.

Georgia Power installs, operates, maintains and owns EV charging stations through its "Community Charging Program."[15] In the Company's 2019 rate case, the Commission approved $2 million per year (2020-2022) in spending for the Community Charging Program.[16] The Company now proposes to extend and expand its program, and requests $3 million per year between 2023 and 2025 for the Program.[17] If approved, the Company's request would result in an additional 33 stations—more than doubling the Company's current deployments through the Community Charging Program.[18]

EVgo believes that utility programs and private investments can play complementary roles in creating a robust, balanced and competitive market for EV charging that will lead to equitable EV adoption over the long-term.[19] To achieve this outcome, however, it is critical that utility deployments do not interfere with or hinder the growth of the competitive charging market.

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[14] To the extent that the Company is interested in prioritizing the make-ready applications it receives and optimally leveraging any approved make-ready funding, EVgo recommends that the Company develop and implement a transparent, points-based scoring rubric. This will help ensure that applicants are aware of the characteristics by which their applications will be evaluated ahead of time and will help applicants tailor site applications accordingly. *See* Direct Testimony of Colin Murchie on behalf of EVgo at 15.
[15] Rebuttal Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson on behalf of Georgia Power Company at 22.
[16] *Id*.
[17] *Id*.
[18] Direct Testimony of Colin Murchie on behalf of EVgo at 16.
[19] *Id*.

Georgia Power asserts that it does not desire or intend to compete with private charging providers. The Company states that it "primarily operates [its Community Charging] program as a provider of last resort to provide public DC fast charging options for EV drivers in areas that lack investment in public DC fast charging."[20] The Company's process for identifying and selecting Community Charging sites, however, leaves a substantial risk that the Company *will in fact* directly compete with competitive charging providers. In order to determine whether the competitive market is likely to serve a prospective Community Charging site, the Company consults publicly available information such as the PlugShare EV Charging Station Map[21] and determines the site's proximity to other existing or anticipated public fast charging sites.[22] While EVgo appreciates the intent, that process needs further refinement, as it is currently subjective, qualitative, and not subject to Commission oversight. Importantly, competitive providers have no effective way of incorporating the Company's internal site evaluation process into their own charging station planning and deployment processes, and additional transparency is needed.

EVgo therefore recommends that the Commission add guardrails to the Company's Community Charging Program. Specifically, EVgo recommends that the Commission direct Georgia Power to establish transparent, publicly-available siting criteria that quantitatively assess whether a prospective Community Charging site is underserved by the private market.

The Company need not start from scratch. EVgo's testimony provides examples of criteria applied by utilities and regulators in other states for the same purpose. For instance, Arizona Public Service and Xcel Energy in Colorado each sought to apply a geographic buffer

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[20] Rebuttal Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson on behalf of Georgia Power Company at 22.
[21] Available at www.plugshare.com.
[22] Direct Testimony of Colin Murchie on behalf of EVgo at 17-18.

around existing stations.[23] In New Jersey, the utility regulator gives utilities an opportunity to affirmatively petition the Commission to own stations in locations where the private market has not developed a charging station after a defined 12 to 18 month window has passed.[24] EVgo recommends that the Commission borrow from these best practices and similar criteria, and direct Georgia Power to place Community Charging stations:

1. In metropolitan areas, only where there are no competing fast charging (>50 kW) sites within a 15-minute drive, and;
2. On highway corridors, only where there are no competing fast charging (>50kW) sites within 25 miles.[25]

Additionally, Georgia Power should provide a list of its proposed utility-owned stations, updated on at least a quarterly basis, to inform the public of locations it has identified as potential gaps in private charging deployment. If a private sector charging provider informs the Company that it is building or intends to build a public charging station within the proposed limits of one of Georgia Power's proposed locations, the Company should allow the private sector provider the opportunity to develop its proposed station and should remove the site from its Community Charging program.[26]

A geographic buffer and transparent disclosure of planned sites will help ensure that the Company does not develop ratepayer subsidized Community Charging sites in locations that are served by the competitive market. It is also important, however, that the Company *price* its service in a manner that does not unfairly compete with the private market. The Company has provided no information regarding the pricing it expects to set for charging stations developed

[23] *Id*. at 19.
[24] *Id*.
[25] *Id*. at 20.
[26] *Id*.

under the Community Charging program, nor has it provided any information on how the pricing for current Company-owned stations is set.[27] Based on publicly available information, Georgia Power charges EV drivers $0.25 per minute to charge at its existing DCFC stations.[28] It is unclear if that price will change in the future and if that pricing will remain for this next set of deployments, if approved.[29]

EVgo therefore recommends that the Company develop a market analysis to inform its pricing and ensure it is in line with what third-party charging providers offer in the state of Georgia.[30] The Colorado Public Utilities Commission instituted a similar process for Xcel-owned DCFC stations to ensure that the utility set pricing that did not undercut pricing by the private market, which includes a number of other ongoing costs in addition to electricity.[31] The Company should file a pricing proposal with the Commission based on that market analysis, and give stakeholders and the Commission an opportunity to review and provide input on that proposal.[32] Collectively, this pricing proposal in conjunction with a geographic buffer and transparent disclosure of anticipated sites will help ensure that Georgia Power follows through on its stated desire to avoid competing with the private market.

C. The Commission Should Direct the Company to Make the CIEV Tariff Available to Existing Charging Stations that Otherwise Meet the Tariff's Eligibility Criteria.

Georgia Power proposes a new tariff in this proceeding which it calls the "Charge It – Electric Vehicle (CIEV) rider. That rider will:

> "modify how the Power & Light tariffs price commercial EV charging loads. Specifically, the new Charge It rider will modify the monthly billing demands by

[27] *Id*.
[28] *Id*.
[29] *Id*.
[30] *Id*.
[31] *Id*. at 21.
[32] *Id*.

> using Billing Demand Adjustment Factors as specified in the tariff. Charge It is a temporary rider that will expire either at the end of 48 months or when the rolling 12-month load factor for the account reaches 15% or greater – whichever comes first. Participation in Charge It is available to new, separately metered charging loads that are served on Georgia Power's system after January 1, 2023."[33]

EVgo supports the CIEV rate.[34] It is a well-structured rate that offers an excellent opportunity to encourage additional investment in EV charging infrastructure if implemented appropriately.[35] The procurement of power represents a significant portion of operating costs borne by EV charging operators, so the availability of Commercial EV rates—rates that account for the uniqueness of DCFC loads—factors into EVSPs' decision-making when developing new charging stations.[36] In particular, the demand charge component of traditional commercial rates can present a barrier to increased deployment of public DCFC infrastructure.[37] The CIEV rider lowers that barrier by reducing the demand charge borne by public DCFC operators for a limited period of time.[38] The CIEV rider can therefore be a valuable catalyst for greater investments in EV charging infrastructure.[39]

Typically, in well designed and comprehensive utility EV charging programs, both EV rates and make-ready are complementary programs.[40] They work hand in hand because each program addresses different aspects of the economics of public charging.[41] Therefore, it is essential

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[33] Direct Testimony of Larry T. Legg on behalf of Georgia Power Company at 17.
[34] Direct Testimony of Colin Murchie on behalf of EVgo at 22.
[35] *Id*.
[36] *Id*.
[37] *Id*.
[38] *Id*. at 22-23.
[39] *Id*. at 23.
[40] *Id*.
[41] *Id*.

that both the Make-Ready program and CIEV rider work in parallel and complement each other.[42] This is easily achieved when the program and the rate have consistent eligibility requirements.[43]

Unfortunately, as proposed, Georgia Power will make its CIEV rider available to new, separately-metered charging stations, whereas the make-ready program will be limited to a subset of charging station deployments (as discussed above).[44] This misalignment risks compromising the value of both program offerings; the CIEV rate is unlikely to realize its full potential unless Georgia Power makes its make-ready program more broadly available, and vice-versa.[45] EVgo therefore recommend that Georgia Power make the rate available not only to new, separately metered charging loads as it proposes, but also to charging stations placed in service before January 1, 2023.[46] Doing so will help ensure that all similarly-placed charging stations in Georgia Power's service territory (charging stations with low load factors) have equal and non-discriminatory access to the beneficial rate.[47] Importantly, in limiting the availability of the rider to stations with a rolling 12-month load factor of 15% or less as proposed, the Company can ensure that stations with higher utilization rates will not receive a demand charge discount.[48]

III. CONCLUSION

EVgo applauds Georgia Power for advancing proposals meant to support the growth of electric transportation in its service territory and provide ratepayer benefit, but urges the Commission to modify those proposals such that the Company does not unreasonably interfere

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[42] *Id*.
[43] *Id*.
[44] *Id*.
[45] *Id*.
[46] *Id*.; Direct Testimony of Justin D. Wilson on behalf of ChargePoint, Inc. at 6.
[47] Direct Testimony of Colin Murchie on behalf of EVgo at 24.
[48] *Id*.

with or tilt the competitive market. For the reasons described in this brief and in EVgo's testimony, EVgo requests that the Commission:

- Direct Georgia Power to continue allowing third party owner-operators of electric vehicle chargers to take separately-metered electric service from the Company;
- Approve Georgia Power's proposal to continue funding its Make Ready Program;
- Direct Georgia Power to develop and publish—as a compliance filing within 30 days following a final order in this case—updated Make Ready Program rules and requirements that expressly allow participation by third-party charging station owner-operators;
- Direct Georgia Power to develop (and use) a transparent, points-based scoring rubric to prioritize Make Ready Program applications in collaboration with electric vehicle charging service providers and other industry stakeholders;
- Direct Georgia Power to allocate funds to Make Ready Program applications already received by the Company that meet the updated Make Ready Program rules and requirements;
- Direct Georgia Power to develop, provide, and apply transparent siting criteria that include specific geographic minimum distances from an existing or proposed third party EV charging station for its Community Charging program;
- Direct Georgia Power to provide a list of its proposed Community Charging stations, updated on at least a quarterly basis, to inform the public of locations it has identified as potential gaps in private charging deployment;
- Direct Georgia Power to allow private sector providers the opportunity to develop a proposed station where the private sector charging provider informs the Company that it is building or intends to build a public charging station within the proposed limits of one of Georgia Power's proposed locations, and to remove the site from its Community Charging program;
- Direct Georgia Power to develop a pricing proposal for its Community Charging program subject to stakeholder input—as a compliance filing within 30 days following a final order in this case—to align its Community Charging pricing with the competitive market, and;
- Approve Georgia Power's proposed CIEV rider, but direct the Company to remove discriminatory restrictions on the availability of that rate and make the rate available to separately-metered charging stations installed before January 1, 2023.

Respectfully submitted this 8th day of December, 2022,

BY: 

Nikhil Vijaykar
KEYES & FOX LLP
580 California St., 12th Floor
San Francisco, CA 94104
Phone: (408) 621-3256
Email: nvijaykar@keyesfox.com

Counsel for EVgo

EXHIBIT A – PROPOSED ORDER

WHEREFORE IT IS ORDERED, Georgia Power Company must continue to provide separately metered service to third party owner operators of electric vehicle charging stations desiring to take separately metered service from the Company;

ORDERED FURTHER, that Georgia Power Company's proposal to invest $81 million (over three years) in electric vehicle charging make-ready infrastructure is approved;

ORDERED FURTHER, that Georgia Power Company must file make-ready program rules and requirements in this docket within 30 days following a final order in this case. Those rules and requirements must allow participation by third-party electric vehicle charging station owner-operators;

ORDERED FURTHER, that Georgia Power Company must develop a transparent, points-based scoring rubric to prioritize make-ready program applications in collaboration with electric vehicle charging service providers and other industry stakeholders;

ORDERED FURTHER, that Georgia Power Company must allocate funds to make-ready program applications already received by the Company that meet the updated make-ready program rules and requirements;

ORDERED FURTHER, that Georgia Power Company must develop, provide, and apply transparent siting criteria that include specific geographic minimum distances from an existing or proposed third party electric vehicle charging station for its Community Charging program;

ORDERED FURTHER, that Georgia Power Company must provide a list of its proposed Community Charging stations, updated on at least a quarterly basis, to inform the public of locations it has identified as potential gaps in private charging deployment;

ORDERED FURTHER, that Georgia Power must allow private sector providers the opportunity to develop a proposed station where the private sector charging provider informs the Company that it is building or intends to build a public charging station within the proposed limits of one of Georgia Power's proposed locations, and to remove the site from its Community Charging program;

ORDERED FURTHER, that Georgia Power must develop a pricing proposal for its Community Charging program subject to stakeholder input—as a compliance filing within 30 days following a final order in this case—to align its Community Charging pricing with the competitive market, and;

ORDERED FURTHER, that Georgia Power's proposed CIEV rider is approved, subject to the modification that the Company must make the rate available to separately-metered charging stations installed before January 1, 2023.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In re: Georgia Power Company's 2022 Rate Case	))	Docket No. 44280

CERTIFICATE OF SERVICE

I hereby certify that I have served the following parties with the foregoing EVgo's Post-Hearing Brief and Proposed Order via electronic mail as follows:

Kelley Balkcom
Mark Vinson
Director, Regulatory Affairs
Georgia Power Company
Regulatory Affairs Bin 10230
241 Ralph McGill Blvd., N.E.
Atlanta, Georgia 30308-3374
mmcclosk@southernco.com
mvison@southernco.com

Brandon Marzo
Steven Hewitson
Allison Pryor
Troutman Sanders LLP
Bank of America Plaza, Suite 5200
600 Peachtree Street N.E.
Atlanta, GA 30308-2216
brandon.marzo@troutman.com
steven.hewitson@troutman.com
allison.pryor@troutman.com

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

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.ga.gov

Preston Thomas
Jamie Barber
Alex Davis
Robert Trokey
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
pthomas@psc.state.ga.us
jamieb@psc.ga.gov
adavis@psc.ga.gov
rtrokey@psc.ga.gov

Charles B. Jones, III
Lloyd Avram
Roy Bowen
Georgia Association of Manufacturers

Jeffry C. Pollock
J. Pollock Incorporated
12647 Olive Boulevard, Suite 585
St. Louis, Missouri 63141

The Hurt Building
50 Hurt Plaza, Suite 985
Atlanta, Georgia 30303
(404) 688-0555
(404) 584-0720 (fax)
cjones@gamfg.org
lavram@gamfg.org
rbowen@gamfg.org

(314) 878-5814
(314) 878-7339 (fax)
jcp@jpollockinc.com

Liz Coyle
Georgia Watch
55 Marietta Street, Suite 903
Atlanta, GA 30303
404-525-1085 ext. 402
lcoyle@georgiawatch.org

Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Telephone: 513-421-2255 Fax: 513-421-2764
E-mail: kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

Kevin Higgins
Justin Bieber
ENERGY STRATEGIES, LLC
215 South State Street, Suite 200
Salt Lake City, Utah 84111
Ph: 801-355-4365 Fax: 801 5219142
khiggins@energystrat.com
jbieber@energystrat.com

Dante Mugrace
PCMG and Associates
90 Moonlight Court
Toms River, NJ 08753
Dmugrace@pcmgregcon.com

Emily W. Medlyn
General Attorney
U.S. Army Legal Services Agency
ELD Division
9275 Gunston Road
Fort Belvoir, Virginia 22060-4446
Telephone: (703) 614-3918
Facsimile: (703) 806-0123
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, Esq.
Robert B. Jackson, IV, LLC
260 Peachtree Street - Suite 2200
Atlanta, Georgia 30303
(404) 313-2039
rbj4law@gmail.com

Isabella Ariza, Esq.
Mr. Zachary M. Fabish, Esq.
Sierra Club
50 F Street NW, 8th Floor
Washington, D.C. 20001
(857) 999-6267
isabella.ariza@sierraclub.org
zachary.fabish@sierraclub.org

Newton M. Galloway, Esq.
Terri M. Lyndall, Esq.
Galloway & Lyndall, LLP
406 North Hill Street
Griffin, Georgia 30223
(770) 233-6230
ngalloway@gallyn-law.com
tlyndall@gallyn-law.com

Ben J Stockton, PE, MBA
Executive Director
Concerned Ratepayers of Georgia
2230 Allen Road
Macon, GA 31216
404-924-5336
encomanager13@gmail.com

Steven C Prenovitz, MBA
Consultant
Concerned Ratepayers of Georgia
4295 Amberglade Ct
Norcross, GA 30092
770-448-8978
scprenovitz@gmail.com

Katie Southworth
William Collier
Southface Energy Institute
241 Pine Street, NE
Atlanta, Georgia 30308
ksouthworth@southface.org
wcollier@southface.org

Bryan Jacob
Southern Alliance for Clean Energy
1455 Hampton Hill Drive
Alpharetta, Georgia 30022
bryan@cleanenergy.org

L. Craig Dowdy
Steven L. Jones
Taylor English Duma LLP
1600 Parkwood Circle, Suite 200
Atlanta, Georgia 30339
cdowdy@taylorenglish.com
sjones@taylorenglish.com

Nicole R. Barnett Slaughter
G.A. State Bar No.: 039239
HAMLET LAW
5215 Junction Park Circle, Suite 202
Wilmington, NC 28412
Phone: 910-777-5995
Fax: 910-399-4277
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, NW, Suite 1050
Atlanta, GA 30309
P: (404) 521-9900
F: (404) 521-9909
jwhitfield@selcga.org
jkysor@selcga.org

Alan R. Jenkins
Jenkins at Law, LLC
2950 Yellowtail Ave.
Marathon, FL 33050
(404) 729-2037
aj@jenkinsatlaw.com

Alicia Brown
City of Savannah, Office of Sustainability
801 E. Gwinnett Street
Savannah, GA 31401
912-651-6838
alicia.brown@savannahga.gov

Mike Wharton
Athens-Clarke County Unified Government,
Sustainability Office
110 Bray Street
Athens, GA 30601
706-613-3838
Mike.Wharton@accgov.com

Donald Moreland
Georgia Solar Energy Association
1199 Euclid Avenue
Atlanta, GA 30307
P: (770) 548-2714
F: (404) 521-9909
don@solarcrowdsource.com

Matthew Deal
Jared Ballew
ChargePoint Inc.
254 E. Hacienda Ave.
Campbell, CA 95125
Phone: (202) 528-5008
Matthew.Deal@chargepoint.com
Jared.ballew@chargepoint.com

Deborah Opie
Brionte McCorkle
Georgia Conservation Voters Education Fund
725 Ponce De Leon Ave FL 2
Atlanta, GA 30306
P: (404) 955-7013

John R. Seydel
City of Atlanta Office of Resilience
55 Trinity Avenue
Atlanta, GA 30303
470-421-6160
Jrseydel@atlantaga.gov

David Nifong
City of Decatur, Department of Public Works
2635 Talley Street
Decatur, GA 30030
404-295-2764
david.nifong@decaturga.com

Nina R. Hickson
City of Atlanta
55 Trinity Avenue SW
Suite 5000
Atlanta, Georgia 30303
404-546-4600
NinaRHickson@AtlantaGa.Gov

Scott F. Dunbar
Lucas Fykes
Keyes & Fox LLP
1580 Lincoln St., Suite 1105
Denver, CO 80203
(949) 525-6016
sdunbar@keyesfox.com
kfykes@keyesfox.com

Nikhil Vijaykar
Jason Keyes
Keyes & Fox LLP
580 California St. 12th Floor
San Francisco, CA 94104
Phone: (408) 621-3256
nvijaykar@keyesfox.com
jkeyes@keyesfox.com

Lucy-Bullock Sieger
Dargan Scott Cole
Lightstar Renewables, LLC
501 Boylston Street
Boston, MA 02116
Lucy.Bullock-Sieger@lightstar.com

deborah@gcvoters.org
brionte@gcvoters.org

Simon Mahan
Southern Renewable Energy Association
11610 Pleasant Ridge Rd., Suite 103 #176
Little Rock, AR 72223
(337) 303-3723
simon@southernwing.org

Dargan Scott Cole
Hall Booth Smith, P.C.
2710 Old Milton Parkway, Suite 200
Alpharetta, GA 30009
Phone: (470) 386-6900
scole@hallboothsmith.com

Kimberly ("Kasey") A. Sturm
Weissman PC
One Alliance Center, Fourth Floor
3500 Lenox Road
Atlanta, Georgia 30326
kaseys@weissman.law

Peter J. Andrews
Metropolitan Atlanta Rapid Transit Authority
2424 Piedmont Road, NE
Atlanta, GA 30324
pandrews@itsmarta.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

H. Gordon Kenna
DeKalb County Government
Department of Public Works
1300 Commerce Drive
Decatur, GA 30030
hgkenna@dekalbcountyga.gov

Angie Fiese
Cypress Creek Renewables, LLC
5310 S. Alston Avenue
Building 300
Durham, North Carolina 27713
770 329-4510
angie.fiese@ccrenew.com

Matt Kozey
Cypress Creek Renewables, LLC
1000 Wisconsin Avenue, Suite 100
Washington, D.C. 20007
Matt.kozey@ccrenew.com

Scott Thomasson
Thomasson Law, LLC
1025 Bond Street
Macon, GA 31201
scott@thomassonlaw.net

J. Brett Newsom
Adam Wise
Interstate Gas Supply, Inc.
3344 Peachtree Road, Suite 2150
Atlanta, Georgia 30326
Brett.newsom@scanaenergy.com
Adam.wise@scanaenergy.com

William Bradley Carver, Sr., Esq.
Joel L. McKie, Esq.
HALL BOOTH SMITH, P.C.
191 Peachtree Street NE
Suite 2900
Atlanta, Georgia 30303
Tel. 404.954.5000
bcarver@halloothsmith.com
jmckie@hallboothsmith.com

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Nikhil Vijaykar
KEYES & FOX LLP
580 California St., 12th Floor
San Francisco, CA 94104
Phone: (408) 621-3256
Email: nvijaykar@keyesfox.com

Counsel for EVgo