BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

BRIEF AND PROPOSED ORDER OF
THE KROGER CO.

COMES NOW, The Kroger Co. ("Kroger"), by its counsel and pursuant to the Georgia Public Service Commission's ("Commission") August 5, 2022 Order, files its Brief and Proposed Order.

I. ARGUMENT AND PROPOSED LANGUAGE

1. The Commission Should Recover All PLM Customer-Related Costs Through The PLM Basic Service Charge.

With respect to rate design, Georgia Power Company ("Georgia Power" or "Company") witness Larry Legg stated in his Direct Testimony that the Company proposes to increase all rate elements (demand, energy and customer costs charges) on an equal percentage basis for all customer classes except for PLM. For PLM, the Company proposes to leave the basic service charge unchanged because it was increased in Georgia Power's last rate case. Mr. Legg states; "*The Company applied the proposed increase to each traditional base rate on an equal percentage basis. The requested increase in this filing has been applied so that generally, the energy, demand, and basic service charge components of the base rates have all been adjusted equally. However, the Company did not apply any increase to the basic service charges for the tariffs that had this component adjusted to the full amount of the customer-related costs in the 2019 base rate case.*" (Legg Direct at 5)

Although Mr. Legg is correct that the basic service charge was moved to cost in the last rate case for PLM, customer-related costs for PLM have also increased since that time. Therefore, if the basic service charge for PLM is not increased in this proceeding it will no longer recover 100% of customer-related costs and the PLM basic service charge will be too low relative to the PLM other rate elements, from a cost-of-service perspective. Therefore, it is appropriate to apply a modest increase to the basic service charge along with the hours use energy/demand charges in this case in order to set the basic service charge for PLM at, or close to, cost.

From a customer's perspective, it is important that Georgia Power's rate design be representative of underlying cost causation. If a utility proposes a basic service charge that is below the cost of demand, it is going to seek to recover its class revenue requirement by over-recovering its costs in another area, most typically through levying an energy or demand charge that are above cost. For a given tariff class such as PLM, when the basic service charges are set below cost, and other charges are set above cost, this requires higher usage customers to subsidize the lower usage customers within the class. So aligning rate design with underlying cost causation is important for ensuring equity among customers, because properly aligning charges with costs minimizes cross-subsidies among customers.

2. Proposed Language For The Commission's Order

For the above reasons, Kroger proposes that language be included in the Commission's Order that requires Georgia Power to increase the basic service charge for PLM rate design in the same way that the Company proposes to increase the basic service charge for other tariffs. The following language would achieve this objective:

> "**The energy, demand, and basic service charge components of the base rates for the PLM tariff will be adjusted equally**."

This adjustment would move PLM rate design closer to cost-causation and would not impact any other tariffs. It would also be revenue neutral to Georgia Power.

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December 8, 2022

CERTIFICATE OF SERVICE

I hereby certify that I have served THE KROGER CO'S BRIEF AND PROPOSED ORDER e-filed in the above-referenced docket with the Commission's Executive Secretary, an electronic copy of same was served upon all parties listed on the attached Certificate of Service

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