STATE OF GEORGIA

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Georgia Power Company's Twenty-Eighth Semi-Annual Construction Monitoring Report for Plant Vogtle Units 3 and 4	))))	**Docket No. 29849**

JOINT APPLICATION OF GEORGIA INTERFAITH POWER & LIGHT AND PARTNERSHIP FOR SOUTHERN EQUITY FOR LEAVE TO INTERVENE

Georgia Interfaith Power & Light ("GIPL") and Partnership for Southern Equity ("PSE"), through counsel, hereby apply to the Georgia Public Service Commission ("Commission") for leave to intervene in the above-styled docket pursuant to O.C.G.A. §§ 46-2-59 and 50-13-14 and Commission Rule 515-2-1-.06. In support of this application, GIPL and PSE respectfully show the Commission as follows:

1.

On February 16, 2023, Georgia Power Company ("Georgia Power") filed its Twenty-Eighth Semi-Annual Construction Monitoring Report for Plant Vogtle Units 3 and 4 for Commission review of $461 million of capital expenditures incurred from July 1, 2022 through December 31, 2022. On March 15, 2023, the Commission issued its Procedural and Scheduling order in this VCM proceeding.

2.

GIPL is a 501(c)(3) nonprofit organization headquartered in Decatur, Georgia. GIPL represents the interests of communities of faith in promoting environmental justice, energy conservation, energy efficiency, renewable energy, and related sustainable practices. GIPL

engages faith communities in the stewardship of Creation. GIPL is a growing organization with more than 350 member congregations across the state of Georgia representing a wide variety of faiths and over 100 congregationally based Green Teams working to advance GIPL's objectives. While several of GIPL's participating congregations are located throughout the Atlanta metropolitan area, many are located in other areas of the State, including the Savannah, Macon, Augusta, Acworth, Athens, Gainesville, Sautee-Nacoochee, Dalton, Clayton, Carrollton, Newnan, Roswell, Ellijay, Kennesaw, Covington, Warner Robbins, and Canton areas.

3.

GIPL has an interest in Georgia Power Company's Twenty-Eighth Semi-Annual Construction Monitoring proceeding both on its own behalf and on behalf of its members. Many of GIPL's participating congregations and members of those congregations purchase electricity from Georgia Power, both for their places of worship and for their individual residences. Their consumption and costs for electricity will be affected by the Commission's actions in this docket.

4.

Additionally, GIPL's core mission is to promote the responsible use of God's Creation by producing electricity sustainably, using less electricity through energy efficiency measures, and minimizing the impact of resource decisions on vulnerable communities. GIPL's mission is thus directly impacted by Georgia Power's resource decisions, including its continuation of the Plant Vogtle expansion in lieu of viable and less costly clean energy alternatives. GIPL intends to address the concerns of both itself and its members regarding how the Company's choices impact both God's Creation and the resulting bills that customers, particularly low-income customers, pay. As a result, GIPL has substantial and vital interests in the outcome of this proceeding and seeks to intervene to protect these interests. No other party or intervenor in this case shares GIPL's unique interests, in particular because GIPL is motivated by faith-based principles.

5.

In furtherance of its interests and on behalf of its members, GIPL has intervened in many prior proceedings before the Commission. Among the Commission proceedings in which GIPL has intervened or otherwise participated are Georgia Power's Seventeenth, Eighteenth, Nineteenth, Twentieth/Twenty-First, Twenty-Second, Twenty-Third, Twenty-Fourth, Twenty-Fifth, Twenty-Sixth, and Twenty-Seventh Semi-Annual Construction Monitoring Reports, which are part of this same docket; Georgia Power's 2022 Rate Case, Docket No. 44280; Georgia Power's 2022 Integrated Resource Plan ("IRP") and Demand-Side Management Plan ("DSM") proceedings, Docket Nos. 44160, 44161; Georgia Power's 2020 PURPA Avoided Cost proceeding, Docket Nos. 4822, 16573, 19279; Georgia Power's 2019 Base Rate Case, Docket No. 42516; Georgia Power's 2019 IRP and DSM proceedings, Docket Nos. 42310, 42311; the 2017-2018 DSM Working Group, Docket No. 41253; Georgia Power's 2016 IRP and DSM proceedings, Docket Nos. 40161, 40162; Georgia Power's Application for Certification of a Green Energy Program and Green Energy Pricing Tariff, Docket No. 16573; Georgia Power's 2010 IRP and DSM proceedings, Docket Nos. 31081, 31082; Georgia Power's 2015 and 2016 Advanced Solar Initiative Prime, Docket No. 38877; and the Notice of Inquiry and Workshop to Examine Issues Related to the Value of Renewable Resources and Distributed Energy Resources, Docket No. 39732.

6.

PSE is a 501(c)(3) nonprofit organization headquartered in Atlanta, Georgia that advances policies and institutional actions that promote racial equity and shared prosperity for all in metropolitan Atlanta and the American South. PSE advocates to help low-wealth and historically marginalized communities build power through four areas of focus: energy equity, economic inclusion, equitable land development, and health outcomes.

7.

PSE is a founding member of the Just Energy Circle, a collaborative convening of academics, grassroots community members, and nonprofit organizations who work in concert to promote sustainable, self-sufficient communities that encourage participation in developing clean energy solutions for everyone's benefit. PSE's Just Energy Circle aims to establish structures to ensure that energy opportunities are available to all, including low-income protections, reduced energy costs, and employment. Two distinct aims of PSE's Just Energy work include access to high-quality energy at a fair price for all and transparency and accountability on behalf of energy providers.

8.

PSE works in communities served by Georgia Power, including low-wealth communities. Many individuals in these communities are unable to advocate for their own rights at the Public Service Commission because of their limited resources. The mounting costs of the Vogtle expansion project directly undermine PSE's efforts to protect low-wealth communities from rising energy costs.

9.

PSE has an interest in Georgia Power Company's Twenty-Eighth Semi-Annual Construction Monitoring proceeding both on its own behalf and on behalf of its supporters. Many of PSE's supporters purchase electricity from Georgia Power. Their electricity consumption and the associated costs will be affected by the Commission's actions in this docket. In addition, through its energy equity work, including but not limited to its leadership of the Just Energy Circle, PSE seeks to reduce the burden of high energy costs on low-wealth communities and ensure that communities of color share in the benefits of Georgia's burgeoning clean energy economy. For these reasons, PSE has significant interests in the outcome of these proceedings and seeks to

intervene to protect those interests. No other party or intervenor in this case shares PSE's unique interests, particularly in furtherance of its mission to create energy equity for all.

10.

In furtherance of its interests and on behalf of its supporters, PSE has participated in Georgia Power's Seventeenth, Eighteenth, Nineteenth, Twentieth/Twenty-First, Twenty-Second, Twenty-Third, Twenty-Fourth, Twenty-Fifth, Twenty-Sixth, and Twenty-Seventh Semi-Annual Construction Monitoring Reports, which are part of this same docket; Georgia Power's 2022 IRP and DSM proceedings, Docket Nos. 44160, 44161; Georgia Power's 2019 IRP and DSM proceedings, Docket Nos. 42310, 42311; and the 2017-2018 DSM Working Group, Docket No. 41253.

11.

The interests of GIPL and its participating congregations, and of PSE and its supporters, are not adequately represented by other parties to these proceedings. Other parties that have applied to intervene do not have interests similar to those of GIPL and PSE. The applicants' intervention would not unduly delay the proceedings or prejudice the rights of other parties.

12.

If this application is granted, GIPL and PSE intend to participate fully as parties in this docket.

13.

GIPL and PSE do not presently intend to file testimony in this docket, but reserve the right to do so after reviewing other parties' testimony.

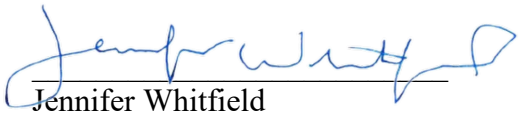
14.

GIPL and PSE respectfully request that the following persons receive all notices, correspondence and copies of orders and other materials in this docket, and be placed upon the official service list:

Jennifer Whitfield
Robert D. Sherrier
Peter Slag
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309
P: (404) 521-9900
F: (404) 521-9909
jwhitfield@selcga.org
bsherrier@selcga.org
pslag@selcga.org

WHEREFORE, GIPL and PSE respectfully request that the Commission grant this application for leave to intervene and admit them as full parties of record in these proceedings with all rights attendant thereto.

Respectfully submitted this 27th day of March, 2023.



Jennifer Whitfield
Robert D. Sherrier
Peter Slag
Southern Environmental Law Center
Ten 10th St. NW, Suite 1050
Atlanta, GA 30309
P: (404) 521-9900
F: (404) 521-9909
jwhitfield@selcga.org
bsherrier@selcga.org
pslag@selcga.org

Counsel for GIPL and PSE

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Georgia Power Company's Twenty-Eighth Semi-Annual Construction Monitoring Report for Plant Vogtle Units 3 and 4	))))	**Docket No. 29849**

VERIFICATION

STATE OF GEORGIA
COUNTY OF FULTON

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, **Jennifer Whitfield**, who, after being duly sworn, deposes and says she is Counsel for Georgia Interfaith Power & Light and the Partnership for Southern Equity, and that the facts contained in the foregoing Joint Application for Leave to Intervene are true and correct to the best of her information and belief.

This 27th day of March, 2023.

Jennifer Whitfield

Sworn to and subscribed before me
this 27th day of March, 2022.

Notary Public

KRISTIN FOLTZ
NOTARY PUBLIC
MY COMMISSION EXPIRES
JUNE 11, 2023
FULTON COUNTY, GEORGIA

CERTIFICATE OF SERVICE

I certify that the foregoing **Joint Application of Georgia Interfaith Power & Light and Partnership for Southern Equity for Leave to Intervene** in Docket No. 29849 was filed with the Public Service Commission by electronic delivery on the 27th of March, 2023. An electronic copy of same was served upon all parties listed below by electronic mail as follows:



Jennifer Whitfield

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

Preston Thomas
Public Interest Advocacy Staff
Georgia Public Service Commission
244 Washington Street SW
Atlanta, Georgia 30334
pthomas@psc.ga.gov

Brandon F. Marzo, Esq.
Steven J. Hewitson, Esq.
Troutman Pepper
Nations Bank Plaza
600 Peachtree Street NE, Suite 5200
Atlanta, Georgia 30308
brandon.marzo@troutman.com
steven.hewitson@troutman.com

Glenn Carroll
Nuclear Watch South
P.O. Box 8574
Atlanta, Georgia 31106
atom.girl@nonukesyall.org

Jim Clarkson
Resource Supply Management
135 Emerald Lake Road
Columbia, South Carolina 29209
jclarkson@rsmenergy.com

Charles B. Jones, III
Lloyd Avram
Georgia Association of Manufacturers
The Hurt Building
50 Hurt Plaza, Suite 985
Atlanta, Georgia 30303
cjones@gamfg.org

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

Steven C. Prenovitz, MBA
Concerned Ratepayers of Georgia
4295 Amberglade Court
Norcross, Georgia 30092
scprenovitz@gmail.com

Liz Coyle
Georgia Watch
55 Marietta Street NW, Suite 903
Atlanta, Georgia 30303
lcoyle@georgiawatch.org

Ben J. Stockton, PE, MBA
Concerned Ratepayers of Georgia
2305 Global Forum Blvd, Suite 912
Atlanta, Georgia 30340
encomanager13@gmail.com

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