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Steven J. Hewitson
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April 24, 2023

Ms. Sallie Tanner
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-5701

Re: Georgia Power Company's Fuel Cost Recovery (FCR-26), Docket No. 44902

Dear Ms. Tanner:

Enclosed for filing on behalf of Georgia Power Company ("Georgia Power" or "Company"), please find the Rebuttal Testimony of the Panel of Sarah P. Adams and Adam D. Houston.

On February 28, 2023, in support of its Fuel Cost Recovery Application ("Application"), Georgia Power filed the Direct Testimony of Ms. Adams and Mr. Houston. Several issues in the Direct and Rebuttal Testimonies overlap or were updated by the Rebuttal Testimony. To avoid duplication of cross examination and provide for administrative efficiency, Georgia Power requests permission to have Ms. Adams and Mr. Houston not sit for cross examination in the direct phase of the hearing, scheduled to begin May 2, 2023, but rather appear last, where they will be available to respond to questions related both to their Direct as well as Rebuttal Testimonies.

I have conferred with counsel for Public Interest Advocacy Staff, as well as Intervenors Georgia Association of Manufacturers (GAM), Georgia Interfaith Power & Light (GIPL), Sierra Club, and Southern Alliance for Clean Energy (SACE), and am authorized to convey that those parties have no objection to the Company's request.

Please call me at (404) 885-3475 if you have any questions regarding this filing.

Sincerely,

Steven J. Hewitson

Enclosure

REBUTTAL TESTIMONY OF

SARAH P. ADAMS AND ADAM D. HOUSTON

ON BEHALF OF GEORGIA POWER COMPANY

GEORGIA PUBLIC SERVICE COMMISSION DOCKET NO. 44902

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. Sarah P. Adams. I am the Vice President and Comptroller for Georgia Power Company ("Georgia Power" or the "Company"). My business address is 241 Ralph McGill Boulevard N.E., Atlanta, Georgia 30308.

A. Adam D. Houston. I am the Assistant Comptroller for Georgia Power. My business address is 241 Ralph McGill Boulevard, Atlanta, Georgia 30308.

Q. MS. ADAMS AND MR. HOUSTON, DID YOU PRESENT DIRECT TESTIMONY AND EXHIBITS ON BEHALF OF GEORGIA POWER IN THIS PROCEEDING?

A. Yes.

Q. MS. ADAMS AND MR. HOUSTON, HAS THE COMPANY FILED UPDATES TO THE MINIMUM FILING REQUIREMENTS ("MFRs") IN THIS PROCEEDING AND RESPONDED TO ALL DATA REQUESTS DUE AS OF THE DATE OF THIS FILING?

A. Yes. The Company has filed MFR updates for the months of January, February, and March 2023. We have also responded to numerous data requests issued by Public Interest Advocacy ("PIA") Staff.

Q. HAVE THERE BEEN ANY CORRECTIONS TO THE DIRECT TESTIMONY OR MFRs INITIALLY FILED BY THE COMPANY?

A. Yes. On April 10, 2023, the Company made an errata filing noting one edit to the Direct Testimony of Sarah P. Adams and Adam D. Houston and revised schedules MFRH-2 and MFRH-5-13. These revisions did not change the Company's actual or projected fuel cost, or the fuel rates requested in this proceeding.

II. THE STIPULATION AND ADJUSTMENTS

Q. HAS THE COMPANY REACHED A STIPULATION IN THIS CASE?

A. Yes. On April 12, 2023, Georgia Power and PIA Staff entered into a Stipulation that resolves all issues in this case. The Stipulation was filed on April 13, 2023, and we adopt the Stipulation as part of our rebuttal testimony.

Q. PLEASE PROVIDE AN OVERVIEW OF THE COMPANY'S REBUTTAL TESTIMONY.

A. Our rebuttal testimony is filed in support of the Stipulation and explains why adoption of the Stipulation is in the best interests of customers and should be approved by the Commission without modification. In addition, our testimony responds to the testimony filed by Jeffry Pollock on behalf of the Georgia Association of Manufacturers ("GAM"), and the testimonies filed by Brent Alderfer and Jeremy Kalin on behalf of the Sierra Club and the Southern Alliance for Clean Energy ("SACE"). Our testimony focuses on several aspects of intervenor testimony without attempting to address every aspect of their testimony. The fact that the Company may not respond to a particular position of an intervenor should not be construed as acceptance of that position.

Q. PLEASE SUMMARIZE THE ADJUSTMENTS TO FCR RATES AGREED TO IN THE STIPULATION.

A. The Stipulation provides significant benefits to customers and requires the Company to provide revised FCR-26 fuel rates updated for (1) the actual under-recovered fuel cost balance through March 31, 2023, (2) projected fuel costs utilizing a more recent natural gas price forecast for the remaining FCR-25 period (i.e., through May 31, 2023) and the FCR-26 test period, and (3) the reduction of $7 million from the fuel balance. The Company's revised fuel rates are based on forecasted natural gas prices as of April 2023 and the actual under-recovered fuel balance as of March 2023.

With these updates, the Company's overall request decreased by over $1 billion. Specifically, the projected fuel costs for the test period (Part A) decreased approximately $647 million, and the projected May 31, 2023 FCR-25 under-recovered fuel balance (Part B) decreased approximately $431 million. Table 1 below compares the Company's original FCR-26 request to its updated request.

Table 1

	Original FCR-26 Filing (in millions)	**Updated FCR-26 Filing (in millions)**	**Difference**
Part A	$5,105	$4,458	($647)
Part B	$2,618	$2,187	($431)

As a result of these updates, the bill impact for the typical residential customer using an average of 1,000-kilowatt hours ("kWh") has decreased from $23 per month (the amount included in the Company's original, February 2023 filing) to approximately $15.90 per month.

Q. IS THE INCOME-QUALIFIED SENIOR CITIZEN FUEL DISCOUNT BEING INCREASED?

A. Yes. The Stipulation adopted the Company's proposal to increase the Income Qualified Senior Citizen Fuel Discount from $6 to $8 per month. When combined with the discount approved in the Company's 2022 base rate case, this brings the total Income Qualified Senior Citizen Discount to $32 per month.

Q. WHAT ARE THE REVISED FCR-26 RATES AS ADJUSTED BY THE STIPULATION?

A. Table 2 below contains the seasonal, stratified FCR-26 rates (reflected in cents per kWh) adjusted in accordance with the terms of the Stipulation:

Table 2

	Average Rate	Transmission	Primary	Secondary
FCR-26 Winter (Oct-May)	4.2512	4.1772	4.2066	4.2832
FCR-26 Summer (June-Sept)	4.5511	4.4719	4.5033	4.5854

The average winter FCR-26 rate (4.2512) represents a 1.4413 cents per kWh (or approximately 51%) increase compared to the average winter FCR-25 rate (including IFR-4). The average summer FCR-26 rate (4.5511) represents a 1.6786 cents per kWh (or approximately 58%) increase compared to the average summer FCR-25 rate (including IFR-4). Revised FCR-26, TOU-FCR-6, and TOU-FCR-TP-4 tariffs reflecting this net increase are provided in Attachments E, F, and G, respectively.

Q. ARE THE COMPANY'S UPDATED PROPOSED FCR-26 RATES CONSISTENT WITH THE RECOMMENDATION IN MR. POLLOCK'S TESTIMONY?

A. Yes. In fact, the FCR-26 rates proposed by the Company are slightly lower than the rates proposed by Mr. Pollock.

Q. WHAT OTHER ADJUSTMENTS TO THE FCR MECHANISM ARE INCLUDED IN THE STIPULATON?

A. The Stipulation provides that the FCR-25 under-recovered fuel balance will be recovered over 36 months instead of the typical 24-month FCR-26 test period. The Stipulation provides for a two-part rate that separately tracks the recovery of FCR-26 projected fuel costs (Part A) and the recovery of the FCR-25 under-recovered fuel balance (Part B). Part B will automatically expire once the FCR-25 under-recovered fuel balance is fully recovered.

Q. DOES THE COMPANY SUPPORT MR. POLLOCK'S RECOMMENDATION FOR A RECOVERY PERIOD OF AT LEAST 60 MONTHS FOR THE FCR-25 UNDER-RECOVERED FUEL BALANCE?

A. No. The Company evaluated several scenarios in determining that 36 months appropriately balances the interests of customers with the Company's need to recover its costs over a reasonable period of time. The FCR-25 under-recovered balance began in June 2021 and is not expected to be eliminated until May 2026, consistent with the 36-month recovery period provided for by the Stipulation. This means that the Company will have carried an under-recovered fuel balance for five years. Prolonging the recovery period beyond the 36-month period agreed to in the Stipulation further extends the recovery of the under-recovered balance into future FCR periods, results in increased total fuel costs for customers, and provides increased strain on the Company's financial integrity.

Q. DID THE STIPULATION ADOPT THE COMPANY'S PROPOSAL TO MODIFY THE IFR MECHANISM?

A. Yes. Consistent with the Company's proposal, the Stipulation modifies one aspect of the IFR mechanism so that the maximum amount by which fuel rates can be adjusted between fuel cases is increased from 15% to 40% of the approved FCR-26 rates. In addition, the Stipulation clarifies that the $200 million threshold used to determine when the Company should make an IFR filing will be applied against the *current* FCR period (Part A) cumulative over/under-recovery balance as opposed to the Company's *total* cumulative over/under-recovered balance.

Q. DOES THE COMPANY AGREE WITH MR. POLLOCK'S RECOMMENDATION THAT THE COMMISSION SHOULD LIMIT THE MAXIMUM INCREASES UNDER THE IFR MECHANISM TO THE LOWER OF 40% OR 1 CENT PER KWH?

A. No. As recent history demonstrates, fuel costs can fluctuate both rapidly and with great magnitude. The ability to adjust fuel rates up to a maximum of 40% provides the Company and the Commission the appropriate and necessary flexibility to mitigate against significant under-recoveries prior to the next fuel case filing.

Q. DOES THE COMPANY AGREE WITH MR. KALIN'S POSITION THAT THE PROPOSED CHANGE TO THE IFR MECHANISM RISKS VIOLATING THE COMMISSION'S STATUTORY RESPONSIBILITY TO CONDUCT A PRUDENCY REVIEW OF GEORGIA POWER'S FUEL COST?

A. No. The IFR, or a similar fuel adjustment mechanism, has been in place for decades. The Commission and PIA Staff have reviewed and will continue to review any future IFR rate adjustment proposed by the Company. The review includes the underlying actual and projected fuel costs of any IFR adjustment. Moreover, the prudency of the Company's actual fuel costs is reviewed in each fuel case regardless of whether an IFR adjustment was made during the period.

Q. DOES THE STIPULATION ADDRESS WHEN FCR-27 WILL BE FILED?

A. Yes. The Company will file FCR-27 on or before February 28, 2026, with revised fuel rates taking effect June 1, 2026.

III. OTHER INTERVENOR RECOMMENDATIONS

Q. IS THE FUEL CASE THE APPROPRIATE PROCEEDING IN WHICH TO ASSESS THE COMPANY'S RESOURCE PLANNING AND GENERATION MIX DECISIONS AS MR. ALDERFER AND MR. KALIN SUGGEST?

A. No, Sierra Club and SACE Witnesses Alderfer and Kalin are incorrect in their assertion that the Company's resource planning and generation mix decisions are made without consideration of fuel cost impacts. Under Georgia law, the Company must file an Integrated Resource Plan ("IRP") every three years. The IRP, which is based on a twenty-year electric demand and energy forecast, sets forth the Company's plan to meet the energy needs of its customers in the most economical and reliable manner. The IRP and its underlying assumptions, such as the impact across a range of projected fuel costs and generation alternatives, are subject to extensive review during a fully litigated proceeding through which the IRP is approved by the Commission.

IV. CONCLUSION

Q. WHY SHOULD THE COMMISSION APPROVE THE STIPULATION?

A. The Stipulation, which was reached as a compromise between the Company and PIA Staff, provides significant benefits to the Company's customers and is a fair and reasonable resolution of all the issues in the case. The Stipulation reduces the fuel costs requested in the Company's initial filing by more than $1 billion, while still providing for the timely recovery of fuel costs previously incurred to serve customers. As a result of the Stipulation, the impact on the monthly bill for the typical residential customer using 1,000 kWh per month decreased from

approximately $23 per month to approximately $15.90 per month. The Stipulation is in the best interest of customers and should be approved without modification.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

ELECTRIC SERVICE TARIFF:

FUEL COST RECOVERY SCHEDULE: "FCR-26"

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APPLICABILITY:

This schedule is applicable to and becomes a part of each retail rate schedule in which reference is made to the Fuel Cost Recovery Schedule unless an account is billed on a Time of Use Fuel Cost Recovery Schedule.

RATE:

All bills rendered subject to the Fuel Cost Recovery Schedule shall be respectively increased in an amount equal to:

June through September:

Secondary Distribution customers ..... 4.5854¢ per kWh
Primary Distribution customers ..... 4.5033¢ per kWh
Transmission customers ..... 4.4719¢ per kWh

October through May:

Secondary Distribution customers ..... 4.2832¢ per kWh
Primary Distribution customers ..... 4.2066¢ per kWh
Transmission customers ..... 4.1772¢ per kWh

Fuel Costs shall be the cost of:

(1) fossil, nuclear, bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) consumed in the Company's own plants, and the Company's share of fossil, nuclear, and bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) consumed in jointly owned or leased plants; plus

(2) the identifiable fossil, nuclear, bio-mass (including renewable) fuel and emission allowance costs (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) associated with energy purchased for reasons other than identified in (3) below; plus

(3) the net energy cost of energy purchases, exclusive of capacity or demand charges (irrespective of the designation assigned to such transaction) when such energy is purchased on an economic dispatch basis. Included therein may be such costs as the charges for energy purchases and the charges as a result of scheduled outages, all such kinds of energy being purchased by the buyer to substitute for its own higher cost of energy; less

SCHEDULE: "FCR-26"

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(4) the cost of fossil, nuclear, bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) recovered through intersystem sales when sold on an economic dispatch basis; less

(5) retail portion of gains resulting from the sale of any emissions allowances; less

(6) seventy-five percent of net gains from wholesale market opportunity sales; plus or minus

(7) net gains and losses incurred under the Natural Gas and Oil Procurement and Hedging Program implemented in Docket No. 16134-U; plus or minus

(8) carrying costs on over or under recovered fuel balance calculated at the Company's short-term debt rate and excluding the first $15 million of any under recovered cost; plus or minus

(9) other costs or credits as determined by the Commission for inclusion in, or reduction of, recoverable fuel costs.

DEFINITIONS:

TRANSMISSION CUSTOMERS:

Customers who receive electrical service from a transmission line of 46 kV or higher, or from a substation or a pole-mounted or pad-mounted transformer, which is dedicated to them and whose metering is at or emulated to 46 kV or more.

PRIMARY DISTRIBUTION CUSTOMERS:

Customers who receive electrical service from a distribution line at a voltage between 2.4 kV and 25 kV, or a substation or a pole-mounted or pad-mounted transformer whose high-side and low-side voltage is between 2.4 kV and 25 kV.

SECONDARY DISTRIBUTION CUSTOMERS:

Any customer not defined as a Transmission or Primary Distribution Customer.

INCOME-QUALIFIED SENIOR CITIZEN DISCOUNT:

Qualifying customers, after certification by the Company, will be eligible for a fuel cost recovery credit of up to $8.00 monthly at their primary residence. To qualify, the customer must be certified as eligible for the "INCOME-QUALIFIED SENIOR CITIZEN" credit provided on the Residential Service (R) tariff. There shall be no net credits, nor shall there be any carry-over credits.

GENERAL TERMS & CONDITIONS:

The adjustment calculated under this rider is subject to change in such an amount as may be approved and/or amended by the Georgia Public Service Commission.

Service hereunder subject to Rules and Regulations for Electric Service on file with the Georgia Public Service Commission.

ELECTRIC SERVICE TARIFF:

TIME OF USE FUEL COST RECOVERY SCHEDULE: TOU-FCR-6

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APPLICABILITY:

Available to all customers in Georgia Power Company's service area served on the Time of Use – Residential Energy Only (TOU-REO), Time of Use – Plug-In Electric Vehicle (TOU-PEV), Time of Use – Residential Demand (TOU-RD), Time of Use – Energy Only (TOU-EO), Time of Use – General Service Demand (TOU-GSD), Time of Use – Food and Drink (TOU-FD), Time of Use – High Load Factor (TOU-HLF), Time of Use – Revenue Neutral (TOU-RN), Fixed Pricing Alternative (FPA), Time of Use – Supplier Choice (TOU-SC), and Farm Service (FS) retail rate schedules and any other tariff ordered by the Georgia Public Service Commission.

RATE:

All bills rendered subject to the Time of Use Fuel Cost Recovery Schedule shall be respectively increased in an amount equal to:

On-Peak kWh:

Secondary Distribution customers ..... 6.6835¢ per kWh
Primary Distribution customers ..... 6.5639¢ per kWh
Transmission customers ..... 6.5180¢ per kWh

Off-Peak kWh:

Secondary Distribution customers ..... 4.2375¢ per kWh
Primary Distribution customers ..... 4.1616¢ per kWh
Transmission customers ..... 4.1325¢ per kWh

Fuel Costs shall be the cost of:

(1) fossil, nuclear, bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) consumed in the Company's own plants, and the Company's share of fossil, nuclear, and bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) consumed in jointly owned or leased plants; plus

(2) the identifiable fossil, nuclear, bio-mass (including renewable) fuel and emission allowance costs (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) associated with energy purchased for reasons other than identified in (3) below; plus

TIME OF USE FUEL COST RECOVERY
SCHEDULE: TOU-FCR-6

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(3) the net energy cost of energy purchases, exclusive of capacity or demand charges (irrespective of the designation assigned to such transaction) when such energy is purchased on an economic dispatch basis. Included therein may be such costs as the charges for energy purchases and the charges as a result of scheduled outages, all such kinds of energy being purchased by the buyer to substitute for its own higher cost of energy; less

(4) the cost of fossil, nuclear, bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) recovered through intersystem sales when sold on an economic dispatch basis; less

(5) retail portion of gains resulting from the sale of any emissions allowances; less

(6) seventy-five percent of net gains from wholesale market opportunity sales; plus or minus

(7) net gains and losses incurred under the Natural Gas and Oil Procurement and Hedging Program implemented in Docket No. 16134-U; plus or minus

(8) carrying costs on over or under recovered fuel balance calculated at the Company's short-term debt rate and excluding the first $15 million of any under recovered cost; plus or minus

(9) other costs or credits as determined by the Commission for inclusion in, or reduction of, recoverable fuel costs.

DEFINITIONS:

ON-PEAK:
The On-Peak period is defined as the hours starting at 2:00 p.m. and ending at 7:00 p.m. Monday through Friday for the calendar months of June through September (Summer Months). The above hours on days in which the following holidays are observed shall be considered Off-Peak: Independence Day and Labor Day.

OFF-PEAK:
The Off-Peak period is defined as all hours not included above in the On-Peak period including all weekends and the calendar months of October through May (Winter Months).

TRANSMISSION CUSTOMERS:

Customers who receive electrical service from a transmission line of 46 kV or higher, or from a substation or a pole-mounted or pad-mounted transformer, which is dedicated to them and whose metering is at or emulated to 46 kV or more.

PRIMARY DISTRIBUTION CUSTOMERS:

Customers who receive electrical service from a distribution line at a voltage between 2.4 kV and 25 kV, or a substation or a pole-mounted or pad-mounted transformer whose high-side and low-side voltage is between 2.4 kV and 25 kV.

SECONDARY DISTRIBUTION CUSTOMERS:

Any customer not defined as a Transmission or Primary Distribution Customer.

TIME OF USE FUEL COST RECOVERY
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INCOME-QUALIFIED SENIOR CITIZEN DISCOUNT:

Qualifying customers, after certification by the Company, will be eligible for a fuel cost recovery credit of up to $8.00 monthly at their primary residence. To qualify, the customer must be certified as eligible for the "INCOME-QUALIFIED SENIOR CITIZEN" credit provided on the Residential Service (R) tariff. There shall be no net credits, nor shall there be any carry-over credits.

TERM OF CONTRACT:

Concurrent with the terms of the applicable retail rate schedule.

GENERAL TERMS & CONDITIONS:

The adjustment calculated under this rider is subject to change in such an amount as may be approved and/or amended by the Georgia Public Service Commission.

Service hereunder subject to Rules and Regulations for Electric Service on file with the Georgia Public Service Commission.

ELECTRIC SERVICE TARIFF:

TIME OF USE FUEL COST RECOVERY THREE-PART SCHEDULE: TOU-FCR-TP-4

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APPLICABILITY:

Available to all customers in Georgia Power Company's service area served on the Time of Use – Food and Drink (TOU-FD) and the Time of Use - Plug-In Electric Vehicle (TOU-PEV) retail rate schedules and any other tariff ordered by the Georgia Public Service Commission.

RATE:

All bills rendered subject to the Time of Use Fuel Cost Recovery Three-Part Schedule shall be respectively increased in an amount equal to:

On-Peak kWh:

Secondary Distribution customers ..... 6.6835¢ per kWh
Primary Distribution customers ..... 6.5639¢ per kWh
Transmission customers ..... 6.5180¢ per kWh

Off-Peak kWh:

Secondary Distribution customers ..... 4.4260¢ per kWh
Primary Distribution customers ..... 4.3468¢ per kWh
Transmission customers ..... 4.3164¢ per kWh

Super Off-Peak kWh:

Secondary Distribution customers ..... 3.8231¢ per kWh
Primary Distribution customers ..... 3.7547¢ per kWh
Transmission customers ..... 3.7284¢ per kWh

Fuel Costs shall be the cost of:

(1) fossil, nuclear, bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) consumed in the Company's own plants, and the Company's share of fossil, nuclear, and bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) consumed in jointly owned or leased plants; plus

(2) the identifiable fossil, nuclear, bio-mass (including renewable) fuel and emission allowance costs (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) associated with energy purchased for reasons other than identified in (3) below; plus

TIME OF USE FUEL COST RECOVERY THREE-PART SCHEDULE: TOU-FCR-TP-4

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(3) the net energy cost of energy purchases, exclusive of capacity or demand charges (irrespective of the designation assigned to such transaction) when such energy is purchased on an economic dispatch basis. Included therein may be such costs as the charges for energy purchases and the charges as a result of scheduled outages, all such kinds of energy being purchased by the buyer to substitute for its own higher cost of energy; less

(4) the cost of fossil, nuclear, bio-mass (including renewable) fuel and emission allowances (including credits, offsets, taxes, tariffs or other mechanisms intended to establish a market price for carbon, carbon dioxide and/or other greenhouse gases) recovered through intersystem sales when sold on an economic dispatch basis; less

(5) retail portion of gains resulting from the sale of any emissions allowances; less

(6) seventy-five percent of net gains from wholesale market opportunity sales; plus or minus

(7) net gains and losses incurred under the Natural Gas and Oil Procurement and Hedging Program implemented in Docket No. 16134-U; plus or minus

(8) carrying costs on over or under recovered fuel balance calculated at the Company's short-term debt rate and excluding the first $15 million of any under recovered cost; plus or minus

(9) other costs or credits as determined by the Commission for inclusion in, or reduction of, recoverable fuel costs.

DEFINITIONS:

ON-PEAK:

The On-Peak period is defined as the hours starting at 2:00 p.m. and ending at 7:00 p.m. Monday through Friday for the calendar months of June through September (Summer Months). The above hours on days in which the following holidays are observed shall be considered Off-Peak: Independence Day and Labor Day.

OFF-PEAK:

The Off-Peak period is defined as the hours between 7:00 a.m. and ending at 11:00 p.m. for weekends, holidays, and the calendar months of October through May. The Off-Peak period for the calendar months of June through September (Summer Months) is defined as the hours between 7:00 a.m. and 2:00 p.m. and the hours between 7:00 p.m. and 11:00 p.m. Monday through Friday.

SUPER OFF-PEAK

The Super Off-Peak period is defined as the hours between 11:00 p.m. and 7:00 a.m. Monday through Sunday for all calendar months.

TIME OF USE FUEL COST RECOVERY THREE-PART SCHEDULE: TOU-FCR-TP-4

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TRANSMISSION CUSTOMERS:

Customers who receive electrical service from a transmission line of 46 kV or higher, or from a substation or a pole-mounted or pad-mounted transformer, which is dedicated to them and whose metering is at or emulated to 46 kV or more.

PRIMARY DISTRIBUTION CUSTOMERS:

Customers who receive electrical service from a distribution line at a voltage between 2.4 kV and 25 kV, or a substation or a pole-mounted or pad-mounted transformer whose high-side and low-side voltage is between 2.4 kV and 25 kV.

SECONDARY DISTRIBUTION CUSTOMERS:

Any customer not defined as a Transmission or Primary Distribution Customer.

INCOME-QUALIFIED SENIOR CITIZEN DISCOUNT:

Qualifying customers, after certification by the Company, will be eligible for a fuel cost recovery credit of up to $8.00 monthly at their primary residence. To qualify, the customer must be certified as eligible for the “INCOME-QUALIFIED SENIOR CITIZEN” credit provided on the Residential Service (R) tariff. There shall be no net credits, nor shall there be any carry-over credits.

TERM OF CONTRACT:

Concurrent with the terms of the applicable retail rate schedule.

GENERAL TERMS & CONDITIONS:

The adjustment calculated under this rider is subject to change in such an amount as may be approved and/or amended by the Georgia Public Service Commission.

Service hereunder is subject to the Rules and Regulations for Electric Service on file with the Georgia Public Service Commission.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing REBUTTAL TESTIMONY OF THE PANEL OF SARAH P. ADAMS AND ADAM D. HOUSTON IN DOCKET NO. 44902 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
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	Bryan Jacob Southern Alliance for Clean Energy 1455 Hampton Hill Drive Alpharetta, GA 30022 bryan@cleanenergy.org
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Charles B. Jones, III Lloyd Avram Georgia Association of Manufacturers The Hurt Building 50 Hurt Plaza, Suite 1620 Atlanta, GA 30303 cjones@gamfg.org lavram@gamfg.org	Jeffry C. Pollock J. Pollock Incorporated 12647 Olive Blvd., Suite 585 St. Louis, Missouri 63141 jcp@jpollockinc.com

This 24th day of April 2023.

Steven J Hewitson
Attorney for Georgia Power Company

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