Troutman Pepper Hamilton Sanders LLP
Bank of America Plaza, 600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308

troutman.com

M. D. Wooldridge
drew.wooldridge@troutman.com

July 10, 2023

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, 2023 Community Charging Plan; Docket No. 44280

Dear Ms. Tanner:

Enclosed for filing in regard to the above-referenced Docket is Georgia Power Company's Response to Americans for Affordable Clean Energy's Comments on Georgia Power Company's Community Charging Plan.

Please do not hesitate to call me at 404-885-3625 if you have any questions.

Best regards,

/s/ M. Drew Wooldridge

M. Drew Wooldridge

MDW:sgp

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

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

GEORGIA POWER COMPANY'S RESPONSE TO AMERICANS FOR AFFORDABLE CLEAN ENERGY'S COMMENTS ON GEORGIA POWER COMPANY'S COMMUNITY CHARGING PLAN

I. INTRODUCTION

Georgia Power Company ("Georgia Power" or the "Company") submits this response to the Comments on Georgia Power Company's Community Charging Plan ("Plan"). On May 8, 2023, the Company filed its first Plan, identifying eleven (11) locations for the placement of electric vehicle ("EV") charging stations as part of Georgia Power's Community Charging Program ("Program"). The Electric Transportation Term Sheet ("Term Sheet"), attached to the Stipulation in Georgia Power's 2022 Rate Case and approved by the Georgia Public Service Commission on December 30, 2022, allowed interested parties to comment on the Plan within thirty (30) days of filing. On June 7, 2023, the Americans for Affordable Clean Energy ("AACE") filed Comments on the Company's Plan.

II. DISCUSSION

The Term Sheet set forth the general parameters of the Program's operation. AACE's Comments identify certain outstanding issues concerning Program implementation to which Georgia Power responds below:

1. **Replacement locations**. While the Term Sheet does not set forth a process for the Company to replace proposed charging locations that are claimed by the market through the contemplated right of first refusal ("ROFR") process, the term sheet provides a $3

million annual budget for the Program. In 2023, this budget will provide funding for eleven (11) new locations. Georgia Power reserves the right to provide replacement locations for any sites claimed by the market through a ROFR under the Program in order to utilize the complete budget. Any proposed replacement locations will also be subject to all the other requirements of the Term Sheet including a new 60-day ROFR process. Due to the timing of this year's filing, Georgia Power may choose to not recommend additional locations in 2023, but the Company may name replacement Community Charging Program locations in 2024 and 2025 based on conditions at that time.

2. **Eligibility**. AACE points out the that proposed Blackshear location in Pierce County (Charger 11 in the Plan) is in a Tier 3 county according to the Georgia Department of Community Affairs ("DCA") 2022 Job Tax Credit Tier map ("2022 DCA Map"). This is true. However, Pierce County is Tier 2 county according to the DCA 2023 Job Tax Credit Tier map ("2023 DCA Map"). For the purposes of Georgia Power's 2023 Plan this issue is moot because of a ROFR filed by Friendly Express, Inc. on May 8, 2023, but the Company recommends that the Commission use the most current DCA map when determining a proposed location's eligibility for the Program in each year's Plan.

3. **The 15-mile restriction**. The Company accepts AACE's recommendation to measure the Program's fifteen (15) mile limitation on charger locations based on a fifteen (15) mile radius around a proposed location. On April 19, 2023, Geo. H. Green Oil, Inc. ("Green Oil") filed a ROFR for Georgia Power's proposed location at the intersection of U.S. 19 and U.S. 41 in Griffin, Georgia. Green Oil's ROFR identifies a location at 1552 Highway 85 South, Fayetteville, Georgia for the installation of an EV charging location. This ROFR is improper as the location identified by Green Oil is beyond the fifteen (15) mile radius of the EV charging location proposed by the Company in Griffin, Georgia. However, on July 6, 2023, Silver Comet Energy filed a proper ROFR for this same location, so there is no longer a need for the Commission to address Green Oil's ROFR.

III. CONCLUSION

The Company files these responses to AACE's comments for Staff's consideration as the Program is implemented.

This 10th day of July, 2023.

/s/ M. Drew Wooldridge
M. Drew Wooldridge
Steven J. Hewitson
Brandon F. Marzo
Allison W. Pryor
Troutman Pepper LLP
Bank of America Plaza
600 Peachtree St., NE, Suite 3000
Atlanta, Georgia 30308

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing GEORGIA POWER COMPANY'S RESPONSE TO AMERICANS FOR AFFORDABLE CLEAN ENERGY'S COMMENTS ON GEORGIA POWER COMPANY'S COMMUNITY CHARGING PLAN 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 mailto:jeffreys@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 GCV 725 Ponce De Leon Ave, FL2 Atlanta, GA 30306 deborah@gcvoters.org	

This 10th day of July 2023.

/s/ M. Drew Wooldridge
M. Drew Wooldridge
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