



Georgia Public Service Commission
244 Washington Street NW
Atlanta, Georgia 30312

August 10, 2023

RE: R-1. DOCKET NO. 44942

Dear Commissioners,

This letter is on behalf of the Georgia SEIA Board (GASEIA) in support of the sentiments and recommendations within the letter submitted by Mr. Otso Lehmussaari on August 10, 2023. GASEIA members feel strongly the current bidding system for solar distributed generation projects which has been in place for many years, has worked well. We commend both Georgia Power Company (GPC) and the Georgia Public Service Commission (PSC) for a process that previously has helped the solar industry grow.

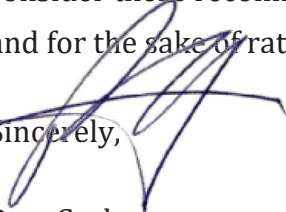
Mr. Lehmussaari points out three very important issues with the proposed changes to the process for awarding bids for GPC's 2023 Distributed Generation Request for Proposals (RFP). First, the proposed changes would obviously give GPC an advantage given its access to inside information on projects that no other solar developer has access to. As a matter of process, this seems to greatly favor one entity over all others.

In regard to contract terms and performance, GPC should be held to the same standards as all the other RFP participants or there is no accountability to the PSC, and ultimately to the rate payer. Allowing any utility or energy provider to operate with without any recourse for bad performance, gives that entity a clear competitive advantage and leaves the rate payer with very little protection. GASEIA respectfully requests the PSC to apply the same guidelines to GPC that apply to all bidders for a more fair competitor process and protection to the rate payer.

GASEIA also strongly opposes the cost recovery options for GPC. Whether it be for development, or the cost of energy production, guaranteeing cost recovery allows GPC to submit bids that can beat any of its competitors' bids while having the ability to change those standards throughout the recovery process to suit its own financial model. This in particular puts all other bidders at such a competitive disadvantage that it destroys the competitive process while also leaving the rate payer unprotected from excessive costs.

The GASEIA Board supports the solutions offered in Mr. Lehmussaari's letter. The proposed changes to the solar Distributed Generation RFP process would only hurt the progress that has been made by the PSC over the last nine years within the solar landscape of Georgia. Georgia has become a leader in the region for the solar industry, and this is a credit to PSC policy. GASEIA members do not want to see this progress reversed, as this could have devastating implications for Georgia's solar businesses and their employees. Please consider these recommendations for the health of the distributed generation solar program and for the sake of rate payers.

Sincerely,



Pete Corbett
President
Georgia SEIA