



Via Alternative Electronic Filing

November 17, 2023

Sallie Tanner  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, 1<sup>st</sup> Floor  
Atlanta, GA 30334

**RE: Georgia Power Company's 2023 Integrated Resource Plan Update, Docket No. 55378**

Dear Executive Secretary Tanner:

Please find enclosed an electronic version of Petition to Intervene of Clean Energy Buyers Association for filing in Docket No. 55378.

Thank you for your consideration.

Sincerely,

/s/ Scott F. Dunbar  
Scott F. Dunbar  
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*Counsel to Clean Energy Buyers  
Association*

**BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF GEORGIA**

<b>In Re:</b>	:	
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<b>GEORGIA POWER COMPANY'S 2023 INTEGRATED RESOURCE PLAN UPDATE</b>	:	<b>DOCKET NO. 55378</b>
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**PETITION TO INTERVENE  
OF CLEAN ENERGY BUYERS ASSOCIATION**

Clean Energy Buyers Association (CEBA), by its undersigned attorneys Keyes & Fox LLP, pursuant to the provisions of O.C.G.A. §§ 50-13-14, 46-2-59 and Commission Utility Rule 515-2-1-.06, hereby respectfully petitions the Georgia Public Service Commission (Commission) for leave to intervene and participate in this docket as a party. In support of this petition, CEBA states as follows:

1. CEBA a 501(c)(6) trade association representing a diverse membership of over 400 members, representing over \$7 trillion in annual revenue and over 14 million employees and includes stakeholders from the commercial and industrial sectors, project developers, service providers, and non-profit organizations. CEBA's membership includes some of the largest buyers of renewable energy that conduct business operations across the United States. Since 2014, commercial and industrial energy customers have voluntarily procured 71 gigawatts (GW) of clean energy, equivalent to 42% of all wind and solar capacity added to the U.S. grid during that time. CEBA's aspiration is to achieve a 90% carbon-free U.S. electric system by 2030 and to cultivate a global community of energy customers driving expanded demand for clean energy.

2. In this proceeding, Georgia Power Company (Georgia Power or the Company) requests that the Commission approve its proposed actions to meet its resource needs through the winter of 2027/2028.<sup>1</sup> Specifically, Georgia Power requests that the Commission approve a Power Purchase Agreement (PPA) with Mississippi Power Company, approve a PPA for capacity from a combined cycle (CC) natural gas facility with Santa Rosa Energy Center LLC, authorize Georgia Power to develop up to 1,000 MW of battery energy storage systems (BESS) at existing solar facilities, authorize Georgia Power to invest in BESS co-located with a new solar facility, authorize Georgia Power to construct new dual-fuel (gas and oil) combustion turbines, authorize Georgia Power to add and expand its distributed energy resource (DER) and demand response (DR) programs, and establish a framework through which Georgia Power would be able to procure additional capacity prior to the 2025 Integrated Resource Plan (IRP) filing.<sup>2</sup>

3. As a business association comprised of large energy customers, including many Georgia Power customers, the Commission's approval, denial, or modification of Georgia Power's proposals in its 2023 IRP update will directly impact CEBA members' property and business interests.<sup>3</sup> Specifically, CEBA members have sustainability goals that require them to reduce the carbon emissions profile of their electricity consumption. CEBA members often purchase clean energy directly when possible and work to ensure that their electricity supply is as clean as possible in states where options to purchase clean energy directly are more limited. In vertically integrated states like Georgia, CEBA members' ability to achieve their clean energy goals is directly tied to the emissions profile of their utility's resource mix. As a result, the ability of CEBA members that are Georgia Power customers to achieve their clean energy goals is dependent on the Commission

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<sup>1</sup> Georgia Power 2023 Integrated Resource Plan Update (2023 IRP Update) at 3.

<sup>2</sup> 2023 IRP Update at 2-3.

<sup>3</sup> O.C.G.A. § 46-2-59(e)(2).

approving a resource mix for Georgia Power's 2023 IRP Update that is as clean as possible while ensuring least-cost principles, economic development goals, and reliable service requirements are achieved. CEBA members can only protect their business interests in purchasing electricity generated by clean energy resources through participation in this docket.

4. Further, the cost of the resources Georgia Power procures as a result of the Commission's approval, denial, or modification of the 2023 IRP Update will be recovered through rates from Georgia Power's ratepayers, which includes over 90 CEBA members. As ratepayers, CEBA members have property and business interests in ensuring that the resources Georgia Power procures to meet its capacity needs are cost-effective.

5. For these reasons, the outcome of this docket will directly impact CEBA's members, their property interests, and their business operations in Georgia.

6. CEBA respectfully states that no other entity can represent CEBA's interests in this proceeding. The nature of CEBA's interests and the manner in which the outcome of this proceeding will affect those interests are specific to CEBA's members and CEBA's aspiration of a 90% carbon-free electricity system by 2030. Further, as a membership association of businesses focused on purchasing cost-competitive, reliable clean energy, the interests of CEBA and CEBA members are distinct from other large energy customers or customer groups that may seek to intervene in this docket. Because CEBA's interests arise directly from Georgia Power's proposals in this docket, granting CEBA's intervention will not unduly delay the proceedings or prejudice the rights of other parties.<sup>4</sup>

7. All correspondence to CEBA should be addressed to:

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<sup>4</sup> O.C.G.A. § 46-2-59(e)(2).

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WHEREFORE, CEBA respectfully requests leave to intervene and to participate with full rights as a party in this proceeding.

Dated: November 17, 2023,

Respectfully submitted,

/s/ Scott F. Dunbar

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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

In Re:

GEORGIA POWER COMPANY'S  
2023 INTEGRATED RESOURCE PLAN  
UPDATE

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DOCKET NO. 55378

VERIFICATION

Personally appeared before me the undersigned officer, duly authorized to administer oaths, Scott F. Dunbar, who, after being duly sworn, deposes and states that he is an attorney authorized by Clean Energy Buyers Association to execute this Verification and that the information contained in the foregoing Petition to Intervene is true and correct to the best of his information and belief.



Scott F. Dunbar

State of Colorado  
County of Boulder

The foregoing instrument was acknowledged before  
me on this 15<sup>th</sup> day of November 2023  
by Scott F. Dunbar  
who is personally known to me or has produced  
Colorado Driver License as identification

  
Notary's Signature

**SCOTT PULLEN**  
**NOTARY PUBLIC**  
**STATE OF COLORADO**  
**NOTARY ID 20174010366**  
**MY COMMISSION EXPIRES 03/08/2025**

**BEFORE THE PUBLIC SERVICE COMMISSION**  
**STATE OF GEORGIA**

**In Re:** :  
: **DOCKET NO. 55378**  
**GEORGIA POWER COMPANY'S** :  
**2023 INTEGRATED RESOURCE PLAN** :  
**UPDATE** :

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the following parties with the foregoing Petition to Intervene of Clean Energy Buyers Association via electronic mail as follows:

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Dated: November 17, 2023

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