BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

APPLICATION FOR LEAVE TO INTERVENE OF
THE METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

COMES NOW, the Metropolitan Atlanta Rapid Transit Authority (hereafter "MARTA"), pursuant to O.C.G.A. §§50-13-14 and 46-2-59 and Commission Rule 515-2-1-.06, and hereby files this Application for Leave to Intervene ("Application") in the above-referenced docket. In support thereof, MARTA respectfully shows as follows.

1.

On October 27, 2023, Georgia Power Company (hereinafter "Georgia Power") filed its 2023 Integrated Resource Plan Update. On November 21, 2023, the Commission issued a Procedural and Scheduling Order, which provides that any person or party seeking an application for leave to intervene file the same within thirty (30) days following the first published notice of proceeding. Pursuant to the Order, Georgia Power will be directed to give first notice of the proceedings in this case not later than December 17, 2023. On this 28th day of November, 2023 MARTA files this Application to Intervene and to participate as a party in the above-referenced docket. Accordingly, this application is timely filed.

2.

MARTA is a public authority created by the MARTA Act, Georgia Laws 1965, page 2243, et. seq., as amended from time to time. Its mission is to advocate for and provide safe, multi-modal transit services that advance prosperity, connectivity, and equity for a more livable

region. MARTA provides service to 2.2 million residents of Metro Atlanta and is one of the top 10 transportation agencies in the United States. Its combined bus and rail services support 24,864 jobs throughout Atlanta and the State of Georgia. MARTA's rail service involves over 338 rail cars capable of carrying passengers to any of its 38 stations, and its 550 buses provide service along 1,800 miles of road on 113 routes. MARTA's services help drive economic development in and around the metro-region. MARTA purchases electricity from Georgia Power to power its electric rail service and provides Electric Vehicle charging stations to its patrons and employees. The rates paid by MARTA have a significant impact on MARTA's mission and its customers.

3.

MARTA has a direct interest in the Georgia Power's 2023 Integrated Resource Plan Update case proceedings both on its own behalf and on behalf of its employees and customers. Georgia Power is MARTA's electric service provider and its customers are subject to the impacts of the Company's services and rates. The Commission's approval, denial, or modification of Georgia Power's proposals in its 2023 Integrated Resource Plan Update will directly impact MARTA's transportation and service mandates as well as its property and business interests and the interests of its customers. As a result, MARTA has a substantial interest in this proceeding and desires to intervene in this proceeding to protect its interests and the interests of its employees and customers.

5.

MARTA's interests and those of its customers are not adequately represented by other parties to these proceedings, including the other intervening parties, and MARTA's intervention

and participation in this matter will not unduly delay the proceedings or prejudice the rights of other parties.

6.

MARTA respectfully requests that it be granted leave to intervene and participate fully as a party in these proceedings, including the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

7.

MARTA respectfully requests that the following persons receive all notices, correspondence and copies of pleadings, orders and other materials in this docket, and that all communications regarding this docket be directed to:

Kimberly ("Kasey") A. Sturm
Weissman PC
One Alliance Center, Fourth Floor
3500 Lenox Road
Atlanta, Georgia 30326
kaseys@weissman.law
404.926.4630

Peter J. Andrews
Metropolitan Atlanta Rapid Transit Authority
2424 Piedmont Road, NE
Atlanta, GA 30324
pandrews@itsmarta.com

WHEREFORE, MARTA respectfully requests that the Commission grant its application for leave to intervene and admit it as a full part of record in these proceedings with all rights attendant thereto.

Respectfully submitted this 30th day of November, 2023

Kimberly ("Kasey") A. Sturm
Weissman PC
One Alliance Center, Fourth Floor
3500 Lenox Road
Atlanta, Georgia 30326
404.926.4630
kaseys@weissman.law

Georgia Bar Number 690615

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, Kimberly [Kasey] A. Sturm, who, after being duly sworn, deposes and says that she is the attorney for the Metropolitan Atlanta Rapid Transit Authority and the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of her information and belief.

This 30th day of November, 2023

Kimberly [Kasey] A. Sturm

Sworn to and subscribed before me

this 30th day of November, 2023.

Notary

VANESSA HARGROW
Notary Public, Georgia
Dekalb County
My Commission Expires
February 27, 2024

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
Georgia Power 2022 Rate Case	)	**Docket No. 55378**
	)	

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing ***Application for Leave to Intervene of the Metropolitan Atlanta Rapid Transit Authority*** was field in Docket No. 55378with the Georgia Public Service Commission's Executive Secretary. A copy of the same was served upon all parties listed below by electronic mail, unless otherwise indicated, and addressed as follows:

Brandon Marzo, Esq.
Steve Hewitson, Esq.
Troutman Sanders LLP
Bank of America Plaza, Suite 5200
600 Peachtree Street N.E.
Atlanta, GA 30308-2216
brandon.marzo@troutman.com
steven.hewitson@troutman.com

Preston Thomas
Staff Attorney
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
pthomas@psc.state.ga.us

Jeffry C. Pollock
J. Pollock Incorporated
14323 South Outer 40 Road, Suite 206N
Town and Country, Missouri 63017-5734
(314) 878-5814
(314) 878-7339 (fax)
jcp@jpollockinc.com

This 30th day of November, 2023

Kimberly [Kasey] A. Sturm