BEFORE THE STATE OF GEORGIA
PUBLIC SERVICE COMMISSION

| | | |
|---|---|---|
| In Re: | ) | |
| Georgia Power Company's | ) | Docket No. 55378 |
| 2023 Integrated Resource Plan Update | ) | |

**SIERRA CLUB'S APPLICATION FOR LEAVE TO INTERVENE**

COMES NOW, the Sierra Club, pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Commission Rule 515-2-1-.06, and files its Application for Intervention ("Application") in the above-referenced docket. In support hereof, Sierra Club respectfully states as follows:

[1] Sierra Club is the nation's oldest and largest grassroots environmental organization, with members across the country, including over 10,000 in Georgia. Sierra Club's mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's resources and ecosystems; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. As part of this mission, Sierra Club works on behalf of its members to help transition the power generation industry away from fossil fuels and towards a clean energy economy. Additionally, Sierra Club members purchase electricity from Georgia Power. Their consumption, costs, and terms of service for purchase of electricity may be affected by the Commission's actions in this docket. As a result, Sierra Club has substantial interests in the outcome of this proceeding and desires to intervene in order to protect those interests.

[2] On October 27, 2023, Georgia Power filed with the Commission its 2023 Integrated Resource Plan Update. The Commission approved a procedural and scheduling order for this docket on November 17, 2023. Pursuant to that order, Sierra Club timely files this application for leave to intervene and participate in the above-referenced docket.

[3] Sierra Club 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 because Sierra Club's rights and interests cannot be adequately represented by any other party to the above-styled docket. Sierra Club is particularly interested in the responsible transition away from fossil fuel-based electric generating plants towards meeting electricity demand with clean energy. While Sierra Club has not yet determined all the witness testimony it would offer, Sierra Club anticipates providing experts regarding renewable energy and environmental compliance.

[4] Additionally, Sierra Club's participation in this matter will not unduly delay these proceedings or prejudice any other party. Sierra Club previously applied for leave to intervene in the 2019 and 2022 Georgia Power Company Rate Case dockets, the 2022 Georgia Power Company Integrated Resource Plan, and the 2023 Fuel Cost Recovery docket, and those applications were granted.

[5] Sierra Club requests that the following persons be included on the service list in this docket and that all communications regarding this docket be directed to them:

Curt Thompson, Esq.
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Respectfully submitted this 2nd day of December 2023.

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**VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE**

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, Isabella Ariza, Esq., who, after being duly sworn, deposes and says that she is a Staff Attorney for the Sierra Club and that the facts contained in the foregoing Application for Intervention are true and correct to the best of her knowledge, information, and belief.

This 30 day of November 2023.

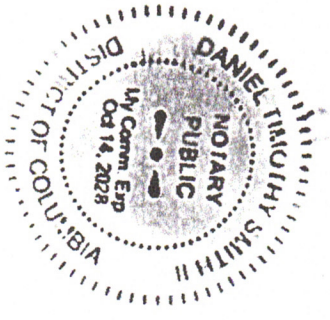
Isabella Ariza

Isabella Ariza, Esq.

Sworn and subscribed
before me this 30 day
of November 2023.

Daniel T Smith II

Notary Public
My Commission Expires: Oct, 14, 2028



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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of *SIERRA CLUB'S APPLICATION FOR LEAVE TO INTERVENE* by email and or by first class U.S. mail with proper postage affixed and addressed as follows:

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SO CERTIFIED this 2nd day of December 2023.

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