BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

APPLICATION FOR LEAVE TO INTERVENE OF
SOUTHERN RENEWABLE ENERGY ASSOCIATION

COMES NOW, the Southern Renewable Energy Association ("SREA"), 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 hereof, SREA respectfully shows as follows:

1.

On October 27, 2023, Georgia Power Company ("Georgia Power") filed for approval of its 2023 Integrated Resource Plan Update ("IRP"). Pursuant to that filing, SREA files this application for leave to intervene and participate in this docket. The application is timely filed.

2.

SREA is a regional trade association, consisting of individuals, businesses, and others that work to promote the responsible development and use of utility-scale wind energy, energy storage, solar energy and transmission throughout the South. Georgia is one of eleven states in which SREA works. SREA believes that the Georgia Power service territory market for utility-scale wind energy, energy storage, solar energy and transmission, is large enough to incorporate

significantly greater amounts of these resources into its IRP, than the IRP has included. SREA members have a vital interest in the pending dockets inasmuch as its members develop and deploy facilities to generate and produce energy. The Commission's actions in this docket will affect development, deployment, or use of the various energy resources in the region and thus will affect the investment decisions made by members of SREA. Moreover, SREA members want to ensure that they can provide low cost energy resources in Georgia to reduce prices for consumers, and economic development for the state. Given the multi-state issues to be discussed in this docket, our regional experience will be helpful for the Commission. As a result, SREA has substantial interests in the outcome of this proceeding and desires to intervene in order to protect those interests.

3.

As required in the Application Requirements adopted by the PSC in the Procedural Schedule Order (PSO), SREA has reviewed the other intervening party applications including applications by Advanced Power Alliance, Sierra Club, Georgia Interfaith Power & Light, Metropolitan Atlanta Rapid Transit Authority, , Southern Alliance for Clean Energy, Clean Energy Buyers Association, and the Georgia Association of Manufacturers,. SREA's rights and interests cannot be adequately represented by any other party to the above-styled docket. SREA's specific interests in utility-scale solar energy, wind energy, energy storage, hybrid resources and transmission are not fully represented in this docket. Its participation in this matter will not unduly delay these proceedings or prejudice any other party.

4.

SREA 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. SREA has participated in prior Georgia Power IRP proceedings. Our expertise regarding utility-scale wind energy, energy storage, solar energy, transmission and utility resource planning would be valuable in this IRP proceeding. SREA intends to participate in the docket by providing direct testimony regarding but not necessarily limited to IRP capacity expansion methodology and assumptions, energy storage, and transmission planning.

5.

SREA requests that all communication regarding this docket be directed to:

Simon Mahan
Southern Renewable Energy Assoc.
11610 Pleasant Ridge Rd., Suite 103 #176
Little Rock, AR 72223
simon@southernwind.org
337-303-3723

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

Respectfully submitted this 6th day of December 2023.

Simon Mahan

Simon Mahan
Executive Director
Southern Renewable Energy Association
11610 Pleasant Ridge Rd., Suite 103 #176
Little Rock, AR 72223
simon@southernwind.org
337-303-3723

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

Simon Mahan, personally appeared before the undersigned Notary Public and stated under oath that he is the Executive Director of the Southern Renewable Energy Association, that he is authorized by the Southern Renewable Energy Association to execute this verification on its behalf and that on his information and belief the facts alleged in the foregoing Application to Intervene are true and correct to the best of his knowledge.

This 6th day of December 2023

Simon Mahan

Simon Mahan

Notarized online using audio-video communication

Notary: State of Florida, County of Duval

Sworn to and subscribed before me this 6th day of December 2023.

Abdulrahman Sardani

Abdulrahman Sardani

ID produced: DRIVER LICENSE

ABDULRAHMAN SARDANI
Notary Public - State of Florida
Commission # HH 382251
Expires on April 3, 2027

GEORGIA PUBLIC SERVICE COMMISSION

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

CERTIFICATE OF SERVICE

I do hereby certify that I have this 6th day of December 2023, served the following parties with the foregoing **APPLICATION FOR LEAVE TO INTERVENE OF THE SOUTHERN RENEWABLE ENERGY ASSOCIATION,** by electronic mail.

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
stanner@psc.ga.gov

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

Kelley Balkcom
Georgia Power Company
Regulatory Affairs Bin 10230
241 Ralph McGill Blvd., NE
Atlanta, Georgia 30308
mmclosk@southernco.com

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

Scott F. Dunbar
Alicia Zaloga
Keyes & Fox LLP
1580 Lincoln St., Suite 1105
Denver, CO 80203
(949) 525-6016
sdunbar@keyesfox.com
azaloga@keyesfox.com

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

Charles B. Jones, III
Lloyd Avram
Georgia Association of Manufacturers
The Hurt Building
50 Hurt Plaza, Suite 1620
Atlanta, Georgia 30303
(404) 688-0555
cjones@gamfg.org
lavram@gamfg.org

Bryan Jacob
Southern Alliance for Clean Energy
1455 Hampton Hill Drive
Alpharetta, Georgia 30022
bryan@cleanenergy.org
770-891-5927