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DEC 18 2023

EXECUTIVE SECRETARY
G.P.S.C.

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

Georgia Power Company's 2023 Integrated Resource Plan Update, Certification of the Power Purchase Agreement between Georgia Power Company and Mississippi Power Company, Certification of the Power Purchase Agreement between Georgia Power Company and Santa Rosa Energy Center LLC, and Amended Certification of the Residential Thermostat Demand Response Demand Side Management Program	DOCKET# Docket No. 55378 DOCUMENT# 216791

Application of the Georgia Center for Energy Solutions for Leave to Intervene

The Georgia Center for Energy Solutions ("GCES"), pursuant to O.C.G.A § 46-2-59 and in particular O.C.G.A § 50-13-14 and Commission Rule 515-2-1-.06, hereby files for leave to intervene in the above-referenced docket. In support of this application, GCES respectfully and earnestly shows as follows:

1.

On October 27, 2023, with 51 days of notice, Georgia Power Company ("GPC") filed its 2023 Integrated Resource Plan ("IRP") Update, for which it seeks approval from the Georgia Public Service Commission ("Commission"). The 2023 IRP Update also seeks Certification of two Power Purchase Agreements ("PPA") and an Amended Certification of the residential Thermostat Demand Response program.

2.

On November 21, 2023, the Commission approved the Procedural and Scheduling Order ("PSO") for Docket No. 55378. On December 4, 2023, legal notice of first publication was issued. This application for leave to intervene is timely filed pursuant to the Commission's PSO and within 30 days from first publication.

3.

GCES is a 501(c)(3) nonprofit Georgia-based corporation formed to promote the development of an economic and regulatory framework to transition Georgia's electric sector, transportation sector, and other sectors in the state to a 100% clean energy (zero carbon) future in an equitable, reliable, resilient, sustainable, and economically efficient manner and in furtherance of the public benefit.

4.

GCES leadership includes a ratepayer served by GPC. GCES serves all citizens of Georgia and in particular advocates for the interests of the 2.3+ million residential GPC customers who will be affected by this 2023 IRP Update and who are underrepresented in this proceeding. GCES advocates for clean energy policies and prudent regulatory decisions and by promoting an integrated resource planning process that accurately and transparently accounts for all costs and benefits. GCES seeks to intervene in this proceeding to analyze whether or not the 2023 IRP Update clearly demonstrates, as required by law in O.C.G.A. § 46-3A-2[1], that: "(1) The utility's forecast requirements are based on substantially accurate data and an adequate method of forecasting; (2) The plan identifies and takes into account any present and projected reductions in the demand for energy which may result from measures to improve energy efficiency in the industrial, commercial, residential, and energy-producing sectors of the state; and (3) The plan adequately demonstrates the economic, environmental, and other benefits to the state and to customers of the utility, associated with the following possible measures and sources of supply: (A) Improvements in energy efficiency; (B) Pooling of power; (C) Purchases of power from neighboring states; (D) Facilities which operate on alternative sources of energy; (E) Facilities that operate on the principle of cogeneration or hydro-generation; and (F) Other generation facilities and demand-side options."

5.

GCES also seeks to intervene in these proceedings to ensure rigorous integrated resource planning, analysis, and resource evaluation using proper assumptions and methodologies that result in a low-cost, low-risk, diversified, sustainable, resilient, and reliable portfolio of supply side and demand side-resources with minimal harmful environmental impacts. The founder, Peter Hubbard, is an experienced energy expert and regulatory expert witness who has filed testimony before the Commission in 2019 (Docket no. 42310) and 2022 (Docket nos. 44160 and 44161). Mr. Hubbard has extensive industry experience in integrated resource planning, power market analysis, forecasting, portfolio risk analysis, scenarios, technology assessments, project development, origination, strategy, finance, permitting, real estate, regulation, microgrids, transmission, interconnection queues, beneficial electrification, distributed energy resources, transaction due diligence, natural gas market analysis, and more.

[1] https://law.justia.com/codes/georgia/2010/title-46/chapter-3a/46-3a-2

6.

GCES's interests are not adequately represented by other parties to this proceeding. GCES's intervention would not unduly delay the proceeding or prejudice the rights of other parties. If this application is granted, GCES intends to participate as a party in the docket, albeit limited (in a burdensome way) by the Commission rule that restricts a witness from questioning other witnesses. At this time, GCES intends to submit direct expert testimony in the docket to provide accountability, actionable recommendations, and oversight.

7.

As an example of the need for greater oversight, GCES agrees with the motion from Georgia Interfaith Power & Light "Challenging the Trade Secret Designation of Basic Identifying Information about GPC's Potential Purchase of a Publicly Undisclosed Asset" (document #216564). Furthermore, it is noted that O.C.G.A § 46-3A-3 lists "Actions prohibited without a certificate of public convenience and necessity" and this includes "enter[ing] into a long-term purchase of electric power" and would infer prohibition of the further step of re-marketing a contracted PPA for two (2) years prior to capacity need. GPC is presenting the PPAs with Mississippi Power Company and Santa Rosa Energy Center LLC as a *fait accompli* and only seeking Commission review after entering into the contracts, which does not appear to be legal.

8.

GPC puts its corporate parent shareholder interests over the interests of Georgia ratepayers. In this 2023 IRP Update, GPC proposes a plan that includes 1,400 megawatts ("MW") of new construction gas-fired combustion turbines ("CT"). There is no consideration of how gas CTs are compatible with the 2050 Net Zero Carbon Target or the recent $2 billion Fuel Cost Recovery-26 surcharge for natural gas (docket #44902) or even a design for hydrogen-ready ("H_2") CTs that can co-fire up to 100% H_2. There is no mention that new-build gas CTs will enrich sister companies all owned wholly or in part by parent Southern Company, including Southern Power Company, Southern Company Services, Southern Natural Gas Company, and Southern Wholesale Energy, at the significant expense of ratepayers (to their detriment), given lower-cost alternatives that are not being considered in this 2023 IRP Update.

9.

GPC does a disservice to the Commission and ratepayers by omitting key information from this 2023 IRP Update. For example, the 2022 IRP scenario that focused on High Load—due to electrification-

influenced load growth and based on an Electric Power Research Institute electrification study—is absent from this 2023 IRP Update with no discussion as to why. There is no doubt that a substantial amount of load growth is coming, albeit some demand is coming from controversial cryptocurrency and customers outside GPC's service territory. In fact, the recent onset of load growth in Georgia is not due to a trade magazine and its 10th annual award to the state, but rather it is substantially due to President Biden signing the Inflation Reduction Act and the Infrastructure Investment and Jobs Act, which GPC is not accounting for in its modeling (see GPC response to STF-PIA-4-10). In addition, this 2023 IRP Update fails to address the risible results from the first full year of operations on the Southeastern Energy Exchange Market ("SEEM"). Total first year benefits were only $3.3 million whereas up to $46 million in first year benefits were promised.[2] This 2023 IRP Update does not review the benefit of residential rooftop net metering customers and their contribution to capacity requirements and system reliability. This 2023 IRP Update omits the fact that there are over 40,800 MWs of solar photovoltaic, standalone storage, and hybrid solar+storage projects currently in the Southern Company Interconnection Queue, and that a substantial percentage of this dispatchable renewable capacity could be brought online in Georgia more quickly if GPC found a need for haste. This 2023 IRP Update fails to acknowledge the tremendous benefit and cost savings to ratepayers that would come from sharing capacity resources with neighboring Balancing Authorities, whether bilaterally or through an organized wholesale capacity market.

10.

GPC says twice in testimony (document #216591, page 24 line 14, page 31 line 9) that "time is of the essence." However, GPC has yet to conduct the CARES 2023 Utility Scale Renewable Request for Proposals ("RFP") and has yet to set a date for its All-Source Capacity RFP for 2029-2031, both of which were approved by the Commission in the 2022 IRP—a plan submitted nearly two (2) years ago. Also, what is the status of the five (5) projects totaling 970 MW from the 2022/2023 Utility Scale Renewable RFP?

11.

GCES respectfully requests leave to intervene in this docket in order to propose several lower-cost and higher-reliability resource alternatives for the Commission to consider. GCES is also requesting leave to intervene to push back on any GPC gaslighting about the true net costs of their decision to continue

[2] https://carolinasceba.com/from-rto-insider-after-one-year-seem-still-drawing-criticism/

operating fossil generation and to push back on any outright lies from GPC witnesses that IRP decisions are thoroughly litigated when in fact intervenor testimony is frequently dismissed without consideration of the merits and intervenors are excluded from the stipulation agreement. Finally, GCES is requesting leave to intervene to hold accountable GPC for any imprudent 2023 IRP Update proposals for the purposes of clawing back unearned earnings. This forward-looking 2023 IRP Update would be well-served by a third-party (non-PIA) objective modelling analysis of both GPC-proposed capacity expansion plans and a curated set of intervenor-proposed alternative plans.

12.

GCES requests to receive all notices, correspondence, and copies of orders and other materials in this docket, and that all communications regarding this docket be directed to GCES at the following address:

Peter Hubbard
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55 Leslie St SE
Atlanta, GA 30317
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WHEREFORE, GCES respectfully requests that the Georgia Public Service Commission grant its application and admit it as a full party of record in this proceeding with all rights attendant thereto.

Respectfully submitted this 18 day of December, 2023.

Peter Hubbard
Clean Energy Advocate
Georgia Center for Energy Solutions

BEFORE THE
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Georgia Power Company's 2023 Integrated Resource Plan Update, Certification of the Power Purchase Agreement between Georgia Power Company and Mississippi Power Company, Certification of the Power Purchase Agreement between Georgia Power Company and Santa Rosa Energy Center LLC, and Amended Certification of the Residential Thermostat Demand Response Demand Side Management Program	)	Docket No. 55378

Verification of the Application for Leave to Intervene

Peter Hubbard personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County, and stated that he is representing the Georgia Center for Energy Solutions and that the facts contained in the foregoing application of Georgia Center for Energy Solutions, Inc. for Leave to Intervene are true and correct to the best of his information and belief.

This 18 day of December, 2023.

Peter Hubbard
Clean Energy Advocate
Georgia Center for Energy Solutions

Sworn to and subscribed before me
This 18 day of December, 2023.

Notary Public

My Commission expires: 01/13/2028

KENNADY PAIGE MCAFEE NOTARY PUBLIC Exp. Jan. 13, 2028 CLAYTON COUNTY, GA

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application of the Georgia Center for Energy Solutions for Leave to Intervene was filed in Docket No. 55378 with the Georgia Public Service Commission's Executive Secretary by hand delivery. An electronic copy of same was served upon all parties listed below by electronic mail, unless otherwise indicated, and addressed as follows:

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

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