BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	)	
GEORGIA POWER COMPANY'S	)	**Docket No. 55378**
2023 INTEGRATED RESOURCE PLAN	)	
UPDATE	)	

APPLICATION FOR LEAVE TO INTERVENE OF

THE UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES

The United States Department of Defense and all other Federal Executive Agencies ("DoD/FEA"), hereby petitions the State of Georgia Public Service Commission ("Commission") for leave to intervene in the above-captioned proceeding. DoD/FEA has a direct and significant interest in this proceeding. This application to Intervene is filed pursuant to O.C.G.A. §§50-13-14 and 46-2-59, Commission Rule 515-2-1-.06, and the Commission's November 21, 2023, Procedural and Scheduling Order. In support of this Motion, DoD/FEA states as follows:

I

DoD/FEA will be represented by, with all documents served upon and all communications referred to, its duly authorized representative pursuant to 40 U.S.C. § 501(c), United States Army Legal Services Agency employee:

John Joseph McNutt
Regulatory Law Counsel
U. S. Army Legal Services Agency
Office of The Judge Advocate General
Environmental Law Division

9275 Gunston Road, Suite 4300
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II

DoD/FEA maintains certain military installations and civilian agency activities within the State of Georgia, a number of which obtain electric service from Georgia Power Company ("GPC"). On October 27, 2023, GPC filed a petition with the Commission for approval of its proposed Integrated Resource Plan Update. DoD/FEA has an interest in this proceeding, as the proportion of GPC's resource mix that is served by carbon-emitting resources versus the proportion served by carbon-pollution free electricity (CFE) will have an impact on DoD/FEA's ability to meet its obligations under Section 203 of Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*.[1]

III

DoD/FEA purchases large quantities of electric service from GPC in Georgia. DoD/FEA installations served by GPC include, but are not limited to, Robins Air Force Base, Moody Air Force Base, Naval Submarine Base Kings Bay, Fort Stewart/Hunter Army AirField, Fort Moore, and Fort Eisenhower.

IV

The interests of DoD/FEA are such that they cannot be adequately protected by any other party.

[1] *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*, 86 Fed. Reg. 70,935 (Dec. 13, 2021) (E.O. No. 14057), available at https://www.govinfo.gov/content/pkg/FR-2021-12-13/pdf/2021-27114.pdf.

V

DoD/FEA's intervention and participation herein will not unreasonably broaden the issues, burden the record, unduly affect the rights of participating parties, or unreasonably delay the proceedings.

WHEREFORE, The United States Department of Defense and all other Federal Executive Agencies petitions the Commission for leave to intervene in the captioned proceeding.

Dated this 21st day of December, 2023

Respectfully submitted,



John J. McNutt
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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, John J. McNutt, who, after being duly sworn, deposes and says that he is the attorney for the United States Department of Defense and all other Federal Executive Agencies and the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of his information and belief. This 21st day of December, 2023

John J. McNutt

Sworn to and subscribed before me
this 21st day of December, 2023.

Notary

Farzana Barjor Maneksha
Commonwealth of Virginia
Notary Public
Commission No: 7744219
My Commision Expires : Jan/31/2025

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing ***Application for Leave to Intervene of the United States Department of Defense and all other Federal Executive Agencies*** was filed on 21 DEC 2023 in Docket No. 55378 with the Georgia Public Service Commission's Executive Secretary and electronically mailed to the following parties listed below:

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John J. McNutt