BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

AMENDED 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
Fort Belvoir, VA 22060-5546
(619) 302-9642

Email Address: john.j.mcnutt.civ@army.mil

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. And no other intervenor in this proceeding has similar interests to that of the federal government. DOD/FEA intends to submit direct testimony in this proceeding from experts at Brubaker & Associates. Mike Gorman, Chris Walters, and Brian Collins will sponsor direct

[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.

testimony addressing the following issues identified in Part III(1) of the Commission's PSO: Issue Nos. 1, 2, 3, 5, 6, 7 and 8.

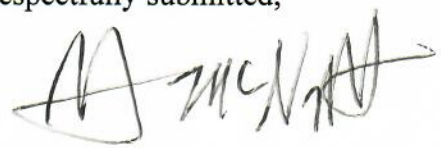
V

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 2nd day of January, 2024

Respectfully submitted,



John J. McNutt
Regulatory Law Counsel
U. S. Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road, Suite 4300
Fort Belvoir, VA 22060-5546
Phone: (619) 302-9642

Email: john.j.mcnutt.civ@army.mil

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VERIFICATION OF AMENDED 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 Amended Application for Leave to Intervene are true and correct to the best of his information and belief. Dated 2 JAN 2024.

John J. McNutt

Sworn to and subscribed before me
this 2nd day of January, 2024.

Notary

HAMZA ASIF
MY COMM. EXPIRES 11/30/2027
REGISTRATION # 8086940
NOTARY PUBLIC
COMMONWEALTH OF VIRGINIA

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 ***Amended Application for Leave to Intervene of the United States Department of Defense and all other Federal Executive Agencies*** was filed on 2 JAN 2024 in Docket No. 55378 with the Georgia Public Service Commission's Executive Secretary and electronically mailed to the following parties listed below:

Brandon Marzo Steve Hewitson Allison W. Pryor brandon.marzo@troutman.com steven.hewitson@troutman.com Allison.pryor@troutman.com	Preston Thomas Staff Attorney Georgia Public Service Commission pthomas@psc.state.ga.us	Stephanie U. Eaton Carrie H. Grundmann Steven Lee seaton@spilmanlaw.com cgrundmann@spilmanlaw.com slee@spilmanlaw.com
Sallie Tanner Executive Secretary Georgia Public Service Commission stanner@psc.ga.gov	Charles Jones Lloyd Avram cjones@gamfg.org lavram@gamfg.org	Scott Dunbar (CEBA) Alicia Zaloga sdunbar@keyesfox.com azaloga@keyesfox.com
Isabella Ariza Dorothy Jaffe Zachary Fabish Isabella.ariza@sierraclub.org Dori.jaffe@sierraclub.org Zack.fabish@sierraclub.org	Bryan Jacob Southern Alliance for Clean Energy bryan@cleanenergy.org	Jennifer Whitfield Bob Sherrier Southern Environmental Law Center jwhitfield@selcga.org bsherrier@selcga.org
Kimberly Sturm kaseys@weisman.law	Peter Andrews pandrews@itsmarta.com	Curt Thompson curtbthompson@bellsouth.net
Liz Coyle lcoyle@georgiawatch.org	William Carver bcarver@hallboothsmith.com	Simon Mahan Southern Renewable Energy Assoc. simon@southernwind.org
Jeffry C. Pollock jcp@jpollockinc.com	Kathy Reed, H Gordon Kenna kdreed@dekalbcountyga.gov hgkenna@dekalbcountyga.gov	Peter Hubbard peter@georgia-ces.org
Mike Wharton Mike.wharton@accgov.com	David Nifong david.nifong@decaturga.com	Alicia Brown alicia.brown@savannahga.gov
Chandra Farley John R. Seydel cfarley@adantaga.gov Jrseydel@atlantaga.gov	Curt Thompson, Esq. curtbthompson@bellsouth.net	

John J. McNutt