BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

AMENDED APPLICATION FOR LEAVE TO INTERVENE OF
SOUTHERN RENEWABLE ENERGY ASSOCIATION

COMES NOW, the Southern Renewable Energy Association ("SREA"), and hereby files this Amended Application for Leave to Intervene ("Application") in the above-referenced docket pursuant to O.C.G.A. § 46-2-59, Georgia Public Service Commission ("Commission") Rule 515-2-1-.06, and the Commission's Procedural and Scheduling Order (PSO) issued on November 21, 2023. In support hereof, SREA respectfully states as follows:

1.

On October 27, 2023, Georgia Power Company ("Georgia Power") filed its Integrated Resource Plan Update ("IRP"). On December 6, 2023, Georgia Power made a filing indicating that its legal notice was published on December 4, 2023. SREA subsequently filed a timely Application for leave to intervene and participate in this docket on December 6, 2023, within 30 days of Georgia Power's legal notice. SREA files this Amended Application for Leave to Intervene for the purpose of requesting to add its new Regulatory Director, Whit Cox, to the service list for this docket as outlined in paragraph 5 herein.

2.

SREA is a regional trade association that works 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 is a nonprofit trade association consisting of individuals, businesses, and other entities that promote the economic and environmental benefits of utility-scale wind energy, energy storage, solar energy and transmission in Georgia. 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 encourage economic development for the state. As a result, SREA has substantial interests in the outcome of this proceeding and desires to intervene in order to advance and protect those interests.

3.

As required in the Application Requirements adopted by the Commission in the PSO, SREA has identified other intervening parties whose interests are similar to SREA, including the Advanced Power Alliance, Clean Energy Buyers Association, Sierra Club, Georgia Interfaith Power and Light, Southern Alliance for Clean Energy, Georgia Association of Manufacturers, Georgia Solar Energy Association, and Metropolitan Atlanta Rapid Transit Authority. SREA's rights and interests cannot be adequately represented by any other party to the above-styled docket. SREA's specific interests in the development of utility-scale solar energy, wind energy, energy storage, hybrid resources, and transmission are not adequately represented by the other pending intervenors in this docket. In particular, transmission system planning is not a focal point of the

applications filed by the other pending intervenors. Further, SREA's 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 the following persons be included on the service list in this docket and that all communications regarding this docket be directed to them:

Simon Mahan
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Whit Cox
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WHEREFORE, SREA respectfully requests that the Commission grant its Amended 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 22nd day of January, 2024

Andrew Whitley Cox

Whit Cox
Regulatory Director
Southern Renewable Energy Association
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VERIFICATION OF AMENDED APPLICATION FOR LEAVE TO INTERVENE

Whit Cox, personally appeared before the undersigned Notary Public and stated under oath that he is the Regulatory 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 Amended Application to Intervene are true and correct to the best of his knowledge.

This 22nd day of January, 2024.

Andrew Whitley Cox

Whit Cox

Sworn to and subscribed before me

this 22nd day of January 2024.

DIANA SABINA DUMITRESCU
Notary Public - State of Florida
Commission # HH 426458
Expires on July 26, 2027
Diana Sabina Dumitrescu

Notarized online using audio-video communication

GEORGIA PUBLIC SERVICE COMMISSION

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CERTIFICATE OF SERVICE

I do hereby certify that I have this 22nd day of January, 2024, served the following parties with the foregoing **AMENDED APPLICATION FOR LEAVE TO INTERVENE OF THE SOUTHERN RENEWABLE ENERGY ASSOCIATION,** by electronic mail.

Andrew Whitley Cox

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