

PSC Informal Transmission Request – GPC Responses

November 27, 2023

1) Please describe the studies being performed.

- As discussed during the Transmission Technical Conference, the transmission studies currently being performed will study all requested generation resources as one generation portfolio along with incorporating the projected large loads that are included in the 2023 GPC IRP Update Load Forecast.

2) Please explain why the studies could not have been completed prior to filing the IRP Update.

- As discussed during the Transmission Technical Conference, the additional transmission studies could not be completed by the IRP filing date due to when the generation portfolio was finalized, which was late October. The transmission analyses provided in the IRP Update filing fully support the economics associated with integrating the proposed generation resources into the transmission system.

3) Is it possible the transmission studies will change the Company's requests or action plan?

- As noted during the Transmission Technical Conference, the additional transmission studies will not change the Company's requests or action plan outlined in the IRP Update filing.

4) With respect to the current draft schedule for the docket, does the Company agree Staff and Intervenors may not have the ability to fully review the new transmission studies prior to having to file testimony in February 2024? If so, please explain how the IRP Update filing should be considered complete.

- The IRP Update filing is complete. The Company cannot speak to what Staff or Intervenors will do prior to the filing of their testimony, nor is it clear as to what is meant by "fully review" of the transmission studies. The Company can confirm its belief that adequate time has been allowed in this proceeding for the Staff and Intervenors to evaluate the Company's proposed plan in the IRP Update including a review of the transmission plan consistent with the narrow issues being addressed in this Update. The Company has appropriately put forth the information and supporting evidence for the changed load forecast, changed capacity needs, and proposed resource solutions to meet those needs. The Transmission Investment request is ancillary to the Company's resource requests and necessary for implementation of the IRP Update as proposed. Since the Company needed to move quickly on its filing, the full transmission investment required will be filed subsequently in January as a supplemental filing. Commission Staff has been provided preliminary information to assist with their review of the transmission impacts and the Company will provide the remainder of the information in January. Staff should have adequate time to complete its review.

5) Please identify, quantify, and explain the "transmission investments necessary to accommodate the proposed resources and the Load and Energy Forecast in the 2023 IRP Update." Where are these specific investments and associated costs identified in the IRP Update?

- The transmission screens conducted already support the economics of the requested resource solutions. The information supporting the transmission costs related to accommodating the change in load is not yet available and will be provided in the Company's Supplemental Filing filed in January.
- Following the discussion with Staff at the Transmission Technical Conference, the Company will clarify the scope of its request regarding transmission costs in the 2023 IRP Update as part of its Direct Testimony scheduled to be filed on December 4, 2023.

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6) Please identify the authority (e.g., IRP Act or Commission rule) under which the Commission approves the “transmission investment necessary to accommodate the “Load and Energy Forecast”. Under which Commission Rule or Statute is the Company requesting approval of these costs?

- The Procedural and Scheduling Order (“PSO”) approved by the Commission in Docket No. 55378 expressly enumerates as issue number 8 “Whether to approve the Company’s transmission system expansion to accommodate the above-requested resources and the Company’s Load and Energy Forecast.” The inclusion of this issue in the PSO expressly recognizes the Commission’s authority to consider the Company’s transmission investments necessary to address the load and energy forecast being presented in the 2023 IRP Update. The relevant provisions of law are articulated in the PSO and are those relevant to integrated resource planning. Specifically, they include the following: the IRP Act, O.C.G.A. § 46-3A-1 *et seq*, and Commission Rules 515-3-4-04 and 515-3-4-06.
- The plan (IRP) includes the transmission facilities required to support load/demand as well as proposed supply side resources. The Commission Rules and IRP Statute support this understanding.
- As stated above, the Company will clarify the scope of its request regarding transmission cost recovery in its Direct Testimony on December 4, 2023.