BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

POST-HEARING BRIEF OF WALMART INC.

Walmart Inc. ("Walmart") respectfully submits the following Post-Hearing Brief to the Georgia Public Service Commission ("Commission") regarding Georgia Power Company's 2023 Integrated Resource Plan Update.

INTRODUCTION

On October 27, 2023, Georgia Power Company ("Company") filed its 2023 Integrated Resource Plan ("IRP") Update. To meet its updated load forecast, the Company proposed the following: two Power Purchase Agreements ("PPAs") from existing assets with both Mississippi Power Company and Santa Rosa Energy Center totaling 980 MW; Battery Energy Storage Systems ("BESS") totaling 1,000 MW; three simple-cycle Combustion Turbines ("CTs") totaling up to 1,400 MW at Plant Yates; two new customer Distributed Energy Resource ("DER") programs; and expansion of an existing Thermostat Demand Response program.

On February 15, 2024, Walmart filed the Direct Testimony of Lisa V. Perry ("Perry Direct Testimony"). In Walmart's pre-filed Direct Testimony, Ms. Perry addressed "the Company's proposed DER programs, its proposed commercial and industrial ("C&I") customer demand response program, and opportunities for customers to provide resources that can help the Company meet its increasing customer demand."[1] Walmart recommended that the Commission:

[1] Perry Direct Testimony, p. 3, lines 8-17.

> (1) require the Company to work with interested stakeholders to build upon the Company's proposed DER Co-Location Program, [proposed] DER Customer Owned Program, and [existing] Demand Response Plus Energy Credit Program by developing additional C&I programs that provide more options to customers and will capitalize on resources that customers can bring to the Company's system on both the supply-side and demand-side of the equation, . . . ; and
>
> (2) require the Company seek Commission approval of such program(s) as part of its next statutorily required 2025 IRP.[2]

The Commission conducted Hearings on January 16-17, 2024 (Company Direct Testimony), February 29 – March 1, 2024 (Staff and Intervenor Direct Testimony) and March 27, 2024 (Company Rebuttal Testimony). Ms. Perry testified on March 1, 2024.

On March 27, 2024, the Georgia Public Interest Advocacy Staff ("Staff") and the Company filed a negotiated settlement ("Stipulation") to "resolve all the issues in this Docket." After the Stipulation was filed, additional parties had an opportunity to review and evaluate it. As of this filing, the following parties are signatories to the Stipulation: Advance Power Alliance ("APA"); Clean Energy Buyers Association ("CEBA"); Georgia Association of Manufacturers ("GAM"); Georgia Watch; Metropolitan Atlanta Rapid Transit Authority ("MARTA"); Southern Renewable Energy Association ("SREA"); and Walmart.

ARGUMENT

Walmart is a signatory to and supports the negotiated Stipulation. Several terms of the Stipulation are of significance to Walmart, including the Company's agreement to (1) develop, own and operate up to 500 MW of BESS resources at various sites to serve loads in winter 2026-27[3]; (2) issue a narrowly tailored Request for Proposals ("RFP") on an expedited schedule for an additional 500 MW of BESS[4]; (3) implement its DER Co-Location, DER Customer Owned, and

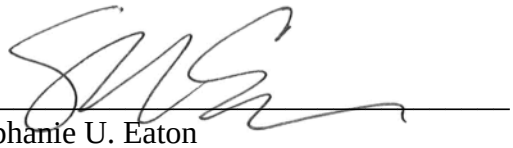
[2] Perry Direct Testimony, p. 3, line 18 to p. 4, line 9.
[3] Stipulation at ¶ 7.
[4] *Id.* at ¶ 9.

Curtailable Load Programs as set forth in Tariffs attached to the Stipulation[5]; and (4) evaluate and develop a solar and storage pilot program for residential and small commercial customers[6]. Further, the Company agreed to continue investigating opportunities to use DER to reduce or defer its needs for additional transmission upgrades and opportunities for additional behind-the-meter demand-side management, DERs, and energy storage systems and related federal funding for these opportunities.[7]

RECOMMENDATION

Walmart recommends that the Commission approve the Stipulation.

Respectfully submitted this 4th day of April, 2024.



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[5] *Id.* at ¶¶13-15.
[6] *Id.* at ¶ 17.
[7] *Id.* at ¶¶ 20, 21.

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CERTIFICATE OF SERVICE

I do hereby certify that I have served the following parties with the foregoing **POST-HEARING BRIEF OF WALMART INC.** via electronic mail as follows:

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