BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

POST-HEARING BRIEF OF THE UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES

INTRODUCTION AND SUMMARY OF POSITION

The Department of Defense ("DOD"), on behalf of itself and all other Federal Executive Agencies (collectively, "DOD/FEA"), hereby submits its post-hearing brief in opposition to the settlement agreement ("Stipulation") entered into on March 26, 2024 between the Georgia Public Service Commission Public Interest Advocacy Staff ("Commission Staff") and Georgia Power GPC ("GPC" or "Georgia Power"), as amended to include the Georgia Association of Manufacturers.

Through its 2023 Integrated Resource Plan Update ("2023 IRP"), Georgia Power proposed, and Commission Staff have since approved, to add generation assets to Georgia Power's portfolio in an amount and type that is all but assured to create a staggering amount of carbon dioxide emissions. Future load growth projected in the 2023 IRP presents an opportunity for Georgia Power to move this state towards a clean, resilient, and affordable energy future. But the Stipulation fails to live up to this potential by omitting the inclusion of even a single carbon-pollution free electricity (CFE) generation asset. Moreover, conspicuously absent from the Stipulation is any means by which GPC customers can procure CFE to meet their energy

requirements. For these reasons and the others described herein, DOD/FEA strongly opposes this settlement.

I. THE MILITARY AND GEORGIA POWER'S OTHER CUSTOMERS ARE DEPENDENT ON GEORGIA POWER WHEN PROCURING ELECTRICITY TO MEET THEIR RESPECTIVE NEEDS

Over roughly the next six years, DOD/FEA must transform how it buys energy in the state of Georgia. By 2030, it must procure 100 percent of its electricity demand in the form of CFE. (Presidential Executive Order 14057.) As GPC's largest customer by consumption, the enormity of this task cannot be overstated. The days for business as usual and incremental change are behind us.

Notably, DOD/FEA is not an outlier in these goals. An urgent desire to move quickly towards clean energy sources is shared by a significant number of other large Georgia Power customers, including members of the Georgia Association for Manufacturing, the Clean Energy Buyers Association (which represents hundreds of large employers), Microsoft, Walmart, and local governments across the state of Georgia. Yet the energy future sought by these and other parties is now considerably further out of reach because of this Stipulation.

With few exceptions, Georgia Power's customers have little to no choice with respect to the sources from which they procure their electricity. GPC's status as a regulated utility means that the multiple large military bases that provide tens of thousands of jobs and the other federal agencies that provide services to millions of Georgians are dependent on Georgia Power to provide pathways for the procurement of clean, resilient power. For that reason, DOD/FEA has engaged thoroughly in this 2023 IRP process. It has presented detailed expert testimony that explains our requirements and how Georgia Power can make choices that align with these objectives. DOD/FEA is not asking Georgia Power to make choices that will come at the

expense of GPC's customer base on the issues of reliability or price. Rather, DOD/FEA and other intervenors have presented realistic changes and strategies available to GPC to move towards a clean energy future while affordably and reliably serving current and future customers. But, through this Stipulation, Georgia Power has rejected these opportunities.

II. THE STIPULATION MOVES GEORGIA POWER BACKWARDS AND IS INCONSISTENT WITH THE OBJECTIVES ESPOUSED BY GEORGIA POWER, SOUTHERN COMPANY, AND GOVERNOR KEMP

The terms of the Stipulation call for Georgia Power to execute large-scale power purchase agreements ("PPAs") with Mississippi Power Company ("MPC") and the Santa Rosa Energy Center for the purchase of energy from carbon-emitting assets. The Stipulation also ensures GPC investment in a large-scale combustion turbine facility without appropriate consideration of comparable costs in a solicitation that considers all sources. The natural gas-fired investments that will result from this Stipulation will add significant carbon dioxide to GPC's system. But the Stipulation does not stop there – it also codifies GPC's PPA for energy and capacity from MPC assets. By Georgia Power's own admission, this contract is likely to rely on old, high carbon emitting coal assets that were previously slated to retire.[1] Adding financial insult to these polluting injuries, the Stipulation ensures that Georgia Power's customers will be charged an additional sum for this contract in certain years even though the energy produced under the PPA is most likely to come from resources that are either nearly or already fully depreciated as part of MPC's rate base and paid for by MPC customers. In sum, Southern Company ("Southern"), Georgia Power's parent company, will earn returns on these assets twice.

[1] Testimony of Priya Barua on behalf of Clean Energy Buyers Association at 8.

These actions stand in sharp contrast to Southern Company's recently stated positions and intent. Just before this IRP was filed, Southern Company participated in a public signing of its Memorandum of Understanding ("MOU") with the General Services Administration ("GSA") in which Southern committed to a partnership to work "collaboratively and expeditiously" towards developing a 100% CFE plan for Federal government electricity customers of Southern's many subsidiaries.[2] Side by side with officials from the White House, the Department of Defense, and GSA, Southern Company unveiled an agreement that references the signatories' "respective sustainability goals" and Southern's intention to construct and/or acquire "the renewable and CFE resources needed to generate additional electricity." Southern's clean energy commitments to the military and Federal government on behalf of itself and its subsidiaries are clear in the MOU but largely absent from the Stipulation.

Similarly, this Stipulation is a stark reversal of recent positive energy trends in the state of Georgia. In GPC's previous IRP proceeding, in 2022, GPC and the Commission effectuated meaningful progress toward clean and resilient energy goals. These included the introduction of a new customer-focused clean energy program, the Clean and Renewable Energy Subscription ("CARES") and plans to retire substantial coal-fired generating capacity over the next several years. The 2022 IRP Order also codified significant IRP process improvement requirements that promised to ensure Georgia Power was appropriately considering the value of CFE resources on its system in future planning processes.

But the 2022 IRP process is not the only evidence of Georgia's intent to move the state forward in ways that align with the requirements of DOD/FEA. Southern Company's website prominently states its commitment to provide clean power to its customers, with Southern calling

[2] Memorandum of Understanding Between General Services Administration and Southern Co., October 13, 2023, at https://www.gsa.gov/system/files/MGB-Accessible-Southern-Company-GSA-MOU-EXECUTED-10-13-23.pdf.

this “fundamental” to its mission. Touting its growth in renewables and storage with simultaneous reduction in its coal fleet, Southern paints a picture of a company committed to rapidly phasing CFE generation into its portfolio while retiring non-CFE assets. Southern highlights its own goals to reduce emissions by 50 percent relative to 2007 levels by 2030 and be net carbon-free by 2050. (see https://www.southerncompany.com/sustainability/clean-energy/net-zero-transition.html). These publicly-stated goals of Southern align with those of DOD/FEA and create an opportunity for partnership. But it is not just Southern Company, Georgia Power, and the Commission that have indicated intent to modernize Georgia’s energy sector; Governor Brian Kemp spoke to world leaders in Davos and touted Georgia’s clean energy future as an economic development benefit. Governor Kemp’s remarks at a recent World Economic Forum conference explained, “[T]he companies that we’re recruiting, people that are looking to the state, they obviously want to produce with clean energy,” and that Governor Kemp would look to Georgia Power to meet those needs. (see https://apnews.com/article/brian-kemp-georgia-davos-electric-vehicles-3cc66e34d8b14f22eb424f5bc6a40ecc?utm_source=Email&utm_medium=share.) The Stipulation fails to respond to Governor Kemp’s call for action.

III. SUCCESSES CURRENTLY WITHIN THE STIPULATION CAN BE ACCELERATED AND AMPLIFIED BY ADDING ADDITIONAL MATERIAL TERMS AND CONDITIONS TO SUPPORT CLEAN AND RESILIENT ENERGY

Clean and resilient energy goals must be balanced with providing reliable service to all of Georgia Power’s customers, a mandate that is challenging when facing unexpected and unprecedented projected load growth. DOD/FEA appreciates and understands that Georgia Power faces a difficult challenge in achieving a multitude of interests and objectives. But these objectives should not be understood as competing interests. GPC has approaches available to it

that would enable an all-of-the-above approach, meeting customer needs while making real progress to a cleaner and more resilient future. The Stipulation constitutes a choice to reject these approaches in favor of moving the state backwards and further away from the modern energy future envisioned by Southern Company, Georgia Power, Governor Kemp, and a significant number of large and small energy customers across the state.

While DOD/FEA appreciates the public commitments made by the aforementioned parties, it is actions alone by which success must be measured. And while this brief has and will further describe actions of Southern, acting through its subsidiary Georgia Power, that plainly move the state of Georgia further from a modern, clean energy future, DOD/FEA would also like to highlight the few aspects of this proceeding that constitute a positive outcome. It is not too late in this proceeding for Georgia Power and the Commission to update the Stipulation to provide for more outcomes, similar to those discussed below, that align with DOD/FEA's requirements.

First and foremost, the Stipulation approves a path forward for two battery energy storage (BESS) projects, one each located on or near Moody and Robins Air Force Bases. (Stipulation ¶ 8.) The military is focused on BESS projects to achieve stable, reliable, scalable, longer-duration backup power. On-site battery storage at military bases throughout Georgia constitutes a win-win for all parties: these grid-facing assets serve all customers as a resource for Georgia Power during its standard operating periods and are capable of powering mission-critical assets at military bases during blackouts to ensure continuity of operations for national defense. DOD/FEA appreciates that this Stipulation enables Georgia Power to move forward with pursuing these BESS projects on two Air Force bases.

The Stipulation also approves two programs for distributed energy resources ("DERs") that provide a pathway for customer-sited generation and storage assets. As confirmed by

Commission Staff testimony, CFE assets are eligible for these DER programs, paving the way for additional on-site solar and BESS solutions for Georgia Power customers.

Finally, commitments by Georgia Power made to DOD/FEA and other intervenors to examine new CFE programs for inclusion in the 2025 IRP are positive outcomes, and DOD/FEA is eager to see Georgia Power implement these commitments in its next IRP. These future plans do not, however, preclude Georgia Power from doing more now – in 2024.

IV. DOD/FEA'S REQUESTED REVISIONS TO THE STIPULATION

DOD/FEA requests the following changes to the Stipulation listed in order of priority:

1. ***Increase the CARES program now.*** Given the magnitude of new load anticipated, and GPC's existing customer base with clean energy goals, the settlement in this proceeding creates an opportunity to increase the CFE capacity procured through a GPC program that the Commission has already approved, the CARES program. Georgia Power currently has a solicitation open to procure resources for the first tranche of CARES subscriptions. Expanding the amount solicited by an additional 1,000 MW would offset the carbon-emitting electricity that will result from the gas generation resources proposed in this IRP and help to ensure that the program will be large enough to cover a significant portion of interested customer load. And because only those customers that opt to subscribe to CARES would pay for these CFE resources, expanding the current CARES procurement should not result in any additional costs shifted onto non-participating customers. Concurrent with this brief, DOD/FEA is filing a motion requesting the Commission to direct Georgia Power to increase procurement through the existing CARES solicitation by 1,000 MW.

2. ***Stipulate that GPC use methodologies in future proceedings that constitute best practices and*** are ***consistent with those used by other regulated utilities.*** DOD/FEA requests that the Commission direct Georgia Power in this Stipulation to make several process improvements in subsequent IRPs. These improvements will bring GPC in line with best practices utilized in other states, facilitate a higher degree of transparency that was absent from the present proceeding, and make it easier for customers to understand the impact of GPC's system plans on their future costs and CFE goals.

DOD-FEA echoes Microsoft's comments highlighting the shortcomings of GPC's capacity accreditation modeling and requests that GPC update key inputs such as planning reserve margin and accreditation each time it proposes substantial system capacity acquisitions.

(Microsoft Comments at ¶¶ 7-8.) Further, it is essential that GPC provides a thorough set of scenarios and sensitivities so that the Commission and parties can adequately assess different potential future systems and provide input into an ultimate plan that ensures Georgia Power plans for a clean, resilient and affordable system into the future.

DOD/FEA seeks the following directives from the Commission to Georgia Power:

a. A directive to accurately accredit the capacity value of solar resource options that GPC includes in its next IRP as directed by the Commission and as illustrated in GPC's own 2022 Effective Load Carrying Capability studies (ELCC);

b. A directive to update GPC's Reserve Margin Study for its next IRP to accurately reflect the GPC's capacity obligation; and

c. A directive requiring additional modeling best practices and customer stakeholder outreach prior to finalization of GPC's subsequent IRPs.

While DOD/FEA urges the Commission to deny the proposed Stipulation, if the Commission determines to approve it, then augmenting the Commission's directives to include those discussed above will improve outcomes for all stakeholders and enable customers, including DOD/FEA, to move closer to its clean energy goals.

DOD/FEA's detailed positions and arguments regarding the matters raised in the summary of position are included in sections A-L of this brief.

ARGUMENT

A. DOD/FEA'S CLEAN ENERGY POLICY AND 2023 AGREEMENT WITH SOUTHERN COMPANY

On December 28, 2021, President Biden issued Executive Order No. 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*. E.O. 14057 states that the Federal Government is the single largest landowner, energy consumer, and employer in the Nation, and can catalyze private sector investment and expand the economy and American industry by transforming how we build, buy, and manage electricity. E.O. No. 14057 calls on

the Federal Government to lead by example to achieve a carbon pollution-free electricity sector by 2035 and net-zero emissions economy-wide by no later than 2050, using a whole-of-government approach. Section 203 of E.O. 14057 calls for each FEA to (1) increase its percentage use of CFE so that it constitutes 100 percent of facility electrical energy use on an annual basis, and (2) seek to match use on an hourly basis to achieve 50 percent 24/7 CFE, by fiscal year 2030.

The Federal government seeks to implement E.O. 14057 Section 203 through programs such as Georgia Power's CARES program, which will help enable the Federal government to scale CFE procurement to 100 percent of its load by 2030 and 50 percent CFE by 2030 on a 24/7 hourly-matched basis. This objective can be achieved by a combination of: grid-supplied CFE (i.e. the CFE resources all jurisdictional customers are already paying for via standard rates): purchased CFE such as via green tariffs like the CARES program; on-site CFE generation, and purchased Energy Attribute Certificates (EACs).

The success of FEA's efforts to implement E.O. 14057 Section 203 depends on the willingness of electricity suppliers to partner with the federal government and both maximize grid-supplied CFE and institute robust purchased CFE options. To the extent those options exist in a service area, DOD and all other federal agencies will pursue "bundled CFE" rather than purchase EACs decoupled from the electricity they represent.

In recognition of the important role our utility partners play in retail regulated markets the Federal government has signed Memoranda of Understanding ("MOUs") with various utilities. These MOUs state that DOD/FEA will work with utilities to execute on existing purchased CFE options as well as establish new programs to enable FEA to achieve clean energy objectives. Southern Company - parent of GPC - has signed one of these MOUs with the U.S. General

Services Administration ("GSA") on behalf of all federal agencies, indicating our mutual agreement on the following four core objectives:

- Developing a roadmap for the Federal Government's electricity needs served by Southern Company to meet the targets set out in the CFE requirements of EO 14057
- Designing a CFE tariff or identifying an applicable regulatory pathway that would provide the appropriate pricing or other terms needed to achieve the requirements of EO 14057
- Subject to Southern Company's respective resource planning and operation obligations, the construction or procurement of CFE resources needed to generate additional electricity and associated EACs, which in conjunction with Southern Company's existing resources, would result in Federal government operations using electricity that is 100 percent attributable to CFE resources by 2030
- In support of EO 14057 requirements, certification and reporting of EACs and Scope 2 emissions accounting to satisfy Federal requirements, including hourly time matching of load and generation and certification of CFE legacy asset output that can be properly attributable to Federal customers

Per the above, the IRPs of Southern Company's subsidiary operating utilities are an essential piece of achieving our joint objectives. GPC currently has green tariff programs in which agencies are exploring enrollment; how much CFE agencies ultimately need to procure is a function of the share of CFE that GPC delivers to customers broadly, as well as how much CFE is available to be procured through existing or newly developed programs. Therefore, IRPs that propose to add substantial new emitting generation, and include relatively low participation caps on clean energy programs, that are likely to be easily outstripped by demand, create serious challenges to our ability to meet the requirements of E.O. 14057. In retail regulated markets customers are largely dependent on utilities and their regulators to ensure that customers have sufficient options, while not taking more than customers' *pro rata* share of these resources.

B. DOD-FEA COMMENDS GEORGIA POWER'S PROPOSED INVESTMENTS IN NO REGRETS CLEAN ENERGY TECHNOLOGIES AND DEMAND-SIDE PROGRAMS

DOD-FEA was pleased to see that GPC requested approval of some CFE technologies in its initial IRP filing. This includes the projects at Robins and Moody Air Force Bases and 1,000 MW of incremental battery energy storage systems ("BESS"). These proposed investments represent a proper and forward-looking approach to firming the solar capacity already on the Company's system, as well as potential future solar investments, to ensure that those resources can contribute more significant capacity value across all seasons. These projects also represent the strong partnership that FEA has and can further establish with the Company and electricity suppliers across the country through the use of available Federal lands to support both Company and FEA resilience and clean energy goals. While FEA is disappointed that the proposed stipulated settlement will reduce the amount of approved incremental storage to 500 MW, FEA supports GPC pursuing additional clean dispatchable resources via its upcoming, potentially expedited all-source RFP.

DOD/FEA also supports the proposed customer demand-side programs, including customer-sited distributed energy resource programs and demand response. To the extent customers can participate and bring resilient clean energy resources to the table, such as on-site solar plus BESS, it will help GPC meet its capacity obligations that need to be met by larger-scale, potentially emitting, resources. The DOD is a large land holder in GPC's service area with site resiliency objectives that align well with these programs. FEA plan to explore the potential to participate, assuming the programs are approved and implemented. However, FEA notes that some parties in the proceeding requested adjusted size thresholds for participation and other changes. Ultimately, as the magnitude of customer adoption depends on program specifics and

the net benefit customers receive from participating in these programs, the Commission should consider requiring the Company to regularly report on customer adoption and feedback received from customers so that it can continue to refine the program.

Unfortunately, the positive aspects of the proposed settlement stipulation are limited to these minimal amounts of BESS and customer choice programs outlined above. The remainder of this brief will focus on the shortcomings of GPC's analysis and the resulting resource procurements proposed, and what the Commission should do to ensure the state's economic development objectives - which depend in large part on GPC's ability to deliver clean energy - and customer clean energy goals can be achieved.

C. GEORGIA POWER'S IRP AND THE STIPULATION DO NOT RESULT IN A CLEAN, AFFORDABLE, OR RESILIENT PLAN THAT SERVES THE BEST INTERESTS OF ALL CUSTOMERS

As noted above, the DOD-FEA has significant concerns with the direction GPC and Staff have taken in the stipulated settlement and ultimately FEA does not believe the plan reflected in the settlement is in the best interest of GPC's customers or the state of Georgia.

In this IRP, GPC has asserted that they are facing unprecedented load growth over the next 5-10 years, primarily as a result of substantial manufacturing onshoring and new data centers. Between confirmed and anticipated future load growth, and the Company's preferred Planning Reserve Margin ("PRM"), GPC anticipated that it would need an additional 6,600 MW of resources by the early 2030s. This projection is based on a new load forecasting approach, to understand large, high load factor customers' likelihood of materializing and when; whereas it is industry standard to forecast probabilistic load into the future and utilize a 50th percentile value (or P50) forecast on which to plan, the Company here proposes to utilize a P95 forecast.

The Company is forecasting planned load per existing agreements, as well as speculative incremental load, and then proposing resources to meet those needs assuming a 95th percentile probability that this load materializes. On top of this P95 forecast the Company applies a high winter planning reserve margin of 26 percent to arrive at its obligation forecast and inform the magnitude and type of resources it proposes in this IRP. While GPC currently has a long position on capacity in all evaluated seasons, this high forecast combined with high winter PRM results in an asserted "need" for incremental accredited capacity specifically in late 2020s winter seasons.

There is compelling testimony on the record, however, that the most reasonable load growth forecast to utilize, as identified by GPC's own modeling, is the P50 level. According to testimony submitted by Chelsea Hotaling on behalf of Georgia Interfaith Power & Light ("GIPL") and supported by other parties, using a more reasonable and likely P50 load forecast enables deferral of long-range capital investments, such as the Plant Yates CTs, until there is more information to consider in the 2025 IRP, and suggests that competitively procured battery energy storage solutions (BESS) are sufficient to meet GPC's capacity needs through 2028. (see GIPL witness Hotaling's Testimony at 3.) Ms. Hotaling's testimony on behalf of GIPL underscores the facility in GPC's use of the P95 load forecast: in adopting P95, GPC is planning for larger load growth than its own simulation says it needs 95% of the time. Put another way, "GPC is planning for more load growth than its model says will be needed in 96,000 out of the 100,000 simulations run." Further scrutinizing GPC's model, Ms. Hotaling finds that even if the Commission were to adopt the P95 load forecast, the Yates Plant is still not necessary to meet GPC's capacity needs, and that a combination of BESS resources and PPAs in 2027 and 2028 could meet the need.

GPC argues in its rebuttal testimony that a P95 forecasting approach and incremental near term resource plan is necessary to ensure that all current customer agreements and a substantial amount of speculative new load can be served. DOD/FEA notes that the Commission would inherently be approving resources in this IRP to serve load that is not guaranteed to materialize and - in fact - in most simulations does not materialize to the level projected per Hotaling's explanation of what a P95 forecast represents. Further, the resources the settlement agreement contemplates approving are not competitively procured nor the most future-proof resources of which the Company can avail itself.

GPC reported in its rebuttal testimony that only one project included in this incremental load forecast had been completely canceled and a handful postponed thus far; but changing financial positions and priorities of these prospective customers can alter these plans without substantial advanced notice. Data centers and cryptocurrency customers can change plans on short notice.

Certainly, neither the Company nor the Commission can control what these customers decide is in their best financial interest and no party in this proceeding is challenging the Company's general assertion that there is significant new load anticipated in the region. It is, however, the Commission's responsibility to ensure that it does not allow GPC to over-procure resources - especially highly emitting, aging and inefficient resources, or resources that were subject to no competition - based on inflated or speculative future load projections. It is existing customers that will be on the hook for these expenses should this new speculative load not materialize. And while the Company provided some information in its rebuttal testimony on the overall expected cost impacts to customers – noting that the increased load would result in lower rates, even with the planned expenditures on new capacity – this analysis was submitted late in

the docket with insufficient time for parties to review its validity or stress test the assumptions. As we will discuss later in this brief, a lack of transparent and well supported scenario analysis is a hallmark of the instant IRP and the Commission should require more rigorous analysis in the future.

Moreover, and more problematic, a few large new customer failures or even increased operating costs for thermal resources could easily flip those benefits to costs. In sum, the type and magnitude of new procurement that could be approved in this IRP looks cost beneficial if one assumes the Company's P95 forecasts and generation operational cost inputs are the most likely outcome; however, there is significant risk that these forecasts are too optimistic on load growth and existing customers will be left financially responsible for at least some magnitude of highly emitting, uncompetitive resources that are ultimately not needed.

D. GPC'S IRP IS NOT REFLECTIVE OF A CLEAN, AFFORDABLE AND RESILIENT PLAN FOR THE FUTURE AND SHOULD NOT BE ACCEPTED AS THE STIPULATION PROPOSES

As noted previously, the stipulation put forward by GPC and supported by Staff and GAM does not move the Company - and Georgia more broadly - in the right direction with respect to the clean, resilient and affordable future customers should expect and to which GPC should aspire. This is an unfortunate regression relative to the 2022 IRP, which resulted in substantial new CFE procurement - in part via the newly formed CARES program - plans to retire many of the Company's aging coal facilities in the next several years, and IRP process improvements that will continue to improve the quality of the Company's analysis on future optimal resource options to serve load. (see Order Adopting Stipulation, 7/29/2022, Docket Nos. 44160 & 44161 at 23-25, 29, 46; Stipulation, 7/13/2022, Docket Nos. 44160 & 44161 at 1, 5-8, 11-12.)

Only a year and a half after that plan was approved, GPC signaled in its IRP update filing that progress has stalled, proposing to add highly emitting assets to the system (including from coal assets that would have otherwise been retired in its Mississippi service area), proposing a large self-build CT based on a speculative load forecast, and even signaling that the company may need to reverse course on its own previously approved future coal retirements. (see Initial filing at 27, in reference to planned Plant Scherer and Plant Gaston Units.) In fact, there is scant evidence in this record that GPC put any serious effort into finding alternate approaches to serve increased load with cleaner or more resilient resources that better position the Company's system for the future. The proposed plan does not even reflect the resource additions GPC modeled in its Base Case capacity expansion plan scenario, much less one that more appropriately reflects the potential impact of the EPA's upcoming final ruling on New Source Performance Standards or the risk of higher natural gas costs in the future. DOD-FEA will address these issues in turn and proposes that the Commission take steps to ensure that these mistakes are not repeated in future IRPs.

E. THE PLAN PRIORITIZES EMITTING RESOURCES WITHOUT CONSIDERING NEGATIVE ENVIRONMENTAL IMPACTS AND CLEAN RESOURCES ARE REJECTED BASED ON FLAWED APPLICATION OF THEIR ACCREDITED CAPACITY CONTRIBUTIONS

As many parties have pointed out, the PPAs and self-build CT resources proposed in the IRP and proposed settlement were not subject to appropriate competition or review before the Company chose to sign contracts or begin development work. These resources will be detrimental to GPC's progress on decarbonizing their system, and therefore to the clean energy and decarbonization goals of their customers. Per GPC's response to Staff data request PIA 12-1, the Santa Rosa PPA and Yates CT units alone will add significant carbon emissions to GPC's

generation resources. This is even before accounting for the MPC PPA, for which the Company did not provide estimated dispatch results, but, by its own admission, is likely to be fulfilled - in part or whole - with coal resources that were otherwise planned to retire.[3]

Despite repeated denials that GPC knows the resources that will be used to fulfill the PPA, GPC's filing leads us to the conclusion that it is likely to be provided for via deferred coal asset retirements. These aging facilities are not only of questionable economic viability but will also emit substantial carbon and other emissions. GPC does not appear to have even evaluated the magnitude of these emissions, much less accepted responsibility for causing them. Because GPC has apparently not modeled the system carbon impacts of this PPA, customers are also left uninformed regarding the magnitude of emissions that will result from this Plan and how much that will set back their efforts to reduce emissions attributable to their operations. Based on the information provided in PIA 12-1 we can infer that the proposed gas resources will add substantial CO2 emissions in the future. Because coal generation emits approximately twice as much on average as natural gas generation, we can expect the combined effect of the MPC PPA with the proposed gas resources to be even more detrimental to customer clean energy objectives.

Further, the Company has rejected incremental clean energy investments in this IRP, it appears, based primarily on a flawed interpretation of the appropriate application of its own Effective Load Carrying Capability (ELCC) study. ELCC studies inform the amount of resource

[3] The Company's initial IRP filing noted that it executed a PPA for 750 MW of capacity and energy from Mississippi Power to Georgia Power. While the PPA does not specify which units will serve the obligations of the PPA, the Company's filing notes that the Order in Mississippi Docket No. 2018-AD-145 required MPC to retire 950 MW of capacity by the end of 2027 unless it can show why continued operation of those resources would be in the best interest of customers (*see* Initial filing in the instant docket at 17). The Order authorized MPC to reduce its capacity, given Staff Consultant's findings that many of the referenced coal units were uneconomic and account for retirement costs in a regulatory asset to be recovered in base rates. The Order can be viewed at: https://www.psc.state.ms.us/InSiteConnect/InSiteView.aspx?model=INSITE_CONNECT&queue=CTS_ARCHIVEQ&docid=655509

adequacy value each installed megawatt of variable renewable and duration limited resources (like BESS) can provide. The ELCC study GPC produced in the 2022 IRP indicated that future generic solar resource additions modeled should be assigned non-zero ELCC values in all seasons, even at high system penetration levels.[4] While the capacity value certainly is low in the winter - in this study estimated to be approximately 5 percent at higher levels of solar adoption - it is not zero, and in all other seasons it is substantially higher. And yet, according to GPC Witness Grubb, the company assumed a 0 percent accreditation value in its modeling.[5] Moreover, solar-plus-storage hybrid resources can represent valuable capacity additions to serve winter peak needs that occur after sunset (the Company's 2022 ELCC study results in an accreditation of 100 percent ELCC from battery energy storage resources in non-winter seasons and 90 percent in winter until adoption achieves a sufficient level to result in diminishing marginal contributions).

Reflecting at least some value of solar and storage resources, the Company's published modeled capacity expansion plan includes substantially more solar and BESS than the Company actually proposed in this IRP; specifically, 740 MW of solar and 3,000 MW of BESS through 2029. But to listen to Company witness Grubb's testimony, one would think that the Company's studies show that solar provides no capacity value in any season, as he repeatedly stated that solar is an "energy resource" (by which he seems to mean one that provides only energy and no capacity value) and that is not what the GPC system currently needs.[6] It is not clear from the record why the Company's proposed plan deviates so significantly from its capacity expansion modeling, and why the Company's witnesses seem to put so little stock in their own ELCC study

[4] *See* Docket No. 44160. *Study of Renewable Energy Capacity Values using the ELCC Methodology in the Southern Company System*, at 9
[5] *See* Docket No. 55378 Transcript, Wednesday January 17, 2024, pages 0584 and 0585.
[6] Tr. 293:15-25, 584:5-585:15.

and industry standard application of ELCC when discussing the resource adequacy value of different resource types.[7] In any case it is clear that the Plan and settled stipulation prioritizes emitting resources over clean ones, even when it appears that cleaner resources can adequately fulfill the Company's needs.

Perhaps equally concerning is that it is not clear from the record and the proposed settled stipulation that the Company or Commission Staff are concerned with GPC following the Commission's 2022 IRP Order, which stated that in the next IRP and upcoming RFPs the company was to "use the ELCC methodology to determine the renewable resource capacity values."[8] DOD/FEA agrees with the 2022 Order that utilization of ELCC in system modeling and planning is industry standard and provides fair and consistent methodology to evaluate the contribution of renewable resources to the system.[9] However, GPC witness statements and the proposed plan itself suggest that even if the Company did utilize these ELCC values in their modeling, they did not inform the actual plan the Company put forward and therefore was not incorporated into GPC's planning appropriately. The modeling clearly states that in the Company's base case, additional solar resources would be part of a least cost system. DOD/FEA questions why GPC did not appropriately follow the 2022 Order with respect to ELCC and why the Staff seems poised to allow this deviation. The same mistakes should not be repeated in future IRPs.

[7] Company counsel also implied via questioning to DOD/FEA expert witness Fitzhenry that because there is substantial solar planned in the Southern Company system that it would be appropriate for the Company to assign any generic solar modeled by the company 0 accreditation value. This notion represents a fundamental misunderstanding of how ELCC should be applied; the mere existence of planned future solar does not render all generic solar valueless, in particular because the company's ELCC study states that at 3,000 MW of solar adoption or more, 5 percent is the appropriate ELCC value to assign.

[8] 2022 Order, at Order Point 32.

[9] *Id.*

F. THE PLAN MAY NOT BE AFFORDABLE GIVEN SPECULATIVE LOAD FORECASTS, MODELING FLAWS AND INCONSISTENCIES BETWEEN THE PROPOSED PLAN AND MODELED CAPACITY NEEDS, AND UNNECESSARY, INAPPROPRIATE ADDITIONAL SUMS APPLIED TO PPAS

As noted above, DOD-FEA has significant concerns regarding the speculative nature of GPC's load forecast. Microsoft Corporation's comments summarized this concern well, saying "...GPC's load forecasting method, which includes large load projects that are considering but have not ultimately selected Georgia as a location and/or GPC as a service provider, potentially results in the acquisition of an excessive amount of carbon-intensive generation."[10] Their comments also note that GPC's approach in this docket is not industry standard, citing several other utility IRPs that base new load forecasts primarily on known projects that have made firm financial commitments to the state, not simply a non-binding request for service.[11] According to expert witness testimony from other parties in this docket, such as GIPL, if GPC had used a more reasonable load forecast (such as the P50 of its simulations rather than P95), much of the emitting generation proposed in this docket could be avoided entirely or at least deferred to future competitive acquisition processes, where it would be required to compete with other, potentially cleaner assets. This would be a better outcome for GPC's existing customers, both from a cost and environmental impact perspective, protecting existing customers from investments that may ultimately prove to be imprudent.

As previously noted, the Company did provide a high-level customer cost impact analysis, which appears to show that there is "headroom" for *some* forecasted load to not materialize and still have the plan result in benefits to customers. Specifically it shows that it

[10] Microsoft Comments on GPC 2023 IRP at 1.
[11] *Id* at 5.

anticipates a levelized net benefit of $168 million in years 2026-2028 *if* all the anticipated load materializes.[12] However, we know that some of the anticipated load is speculative and even those customers with confirmed requests for service do not always follow through on their plans. The Company dismisses this risk by saying that it can just reduce the amount sought through future all-source RFPs if it experiences less load growth than anticipated; however, this prioritizes highly emitting assets (such as the MPC PPA or new Plant Yates CTs) over what could potentially be cleaner or more economically beneficial resources bid into a future RFP.

Further, the PPAs GPC pursued and signed to meet a portion of this speculative new load should not be allowed to generate an additional sum, adding to the risk that existing customers will be on the hook for costs without any guarantee that the associated benefits of new load will materialize. DOD-FEA appreciates that Staff recognized that at least while the incremental capacity is not needed to serve load in the near term, the additional sum should not be approved. Any additional sums on the MPC and Santa Rosa PPAs are inappropriate and should be rejected.

As noted above, the MPC PPA is likely to be fulfilled by aged coal-fired steam resources that were previously slated to retire between the end of 2023 and the late 2020s, and that MPC was authorized to recover costs related to retirement via a regulatory asset. GPC has argued that it was necessary to sign the 5-year MPC PPA to keep aging fossil plants in the Southern power pool to serve load in 2026, 2027, and 2028 because MPC and the MPSC planned to retire or sell the capacity of several plants.[13] GPC witness Grubb claimed that GPC "had to take all five years to get those resources that are crucial to meeting the earliest needs in this case."[14] GPC further argued that it is appropriate for GPC to earn an additional sum of $3/kW-year on the PPA

[12] Direct Testimony of Aaron P. Abramovitz at 7
[13] (Tr. 181:2-7, 216:16-19.)
[14] Tr. 659:7-9.

amounts.[15] This request for an additional sum - while reduced in duration by the stipulated settlement - is inexplicable given the circumstances, both around the need for this PPA as well as the status of these units on MPC's system.

First, the Company argues that an additional sum is appropriate and standard when it signs PPAs because it encourages the Company to pursue or allow third party ownership. As a threshold matter, it should be noted that GPC does not inherently have a right to own all resources on its system or earn on every resource serving its customers; many states have thriving PPA markets without incentivizing the incumbent utility to pursue such arrangements. However, under the Integrated Resource Planning statute, an additional sum on long-term power purchases as determined by the commission is permitted to "encourage such purchases" and "The commission shall consider lost revenues, if any, changed risks, and an equitable sharing of benefits between the utility and its retail customers." [16] Given the urgency GPC has asserted in this docket, there appears to be sufficient encouragement to enter into long-term power purchases in this instance without additional incentivization.

GPC claims that it is facing extraordinary circumstances that require it to act outside of the three-year IRP process and the time constraints limit what resources it can use to meet its claimed load forecasts. If this is true and the MPC PPA is absolutely necessary to allow GPC to meet increased customer load, what further encouragement is necessary? Further, where the MPC fossil plants have "very limited marketability" and are facing retirement,[17] MPC and its

[15] Tr. 182:9-14.
[16] 2022 Georgia Code Title 46-3A-8 Recovery of Actual Cost of Certificated Long-Term Power Purchase.
[17] 12/17/2020 MPSC order in Dkt No. 2018-AD-145, at 4.

affiliates Southern Companies and GPC appear to have significant encouragement to make these long-term power purchases.

Second, the Commission should reconsider whether it is appropriate for the Company to earn an additional sum on PPAs fulfilled by assets that are owned by other Southern Company operating utilities and for which at least part - if not all - of the asset value has been included in and recovered from other Southern Company customers' base rates. The Company states that it is not out of the ordinary for affiliated interest agreements to include additional sums, but the examples produced pertain to Southern Power - which is an unregulated subsidiary - and for assets for which no guaranteed recovery has been granted. The MPC PPA is different; these assets either have been fully depreciated in preparation for retirement or authorized for regulatory asset treatment in the instance they were expected to retire ahead of their previously determined financial end of life, per the Mississippi Order authorizing their retirement.[18] In response to PIA-13-12 the Company states that it "…does not have previous examples of the Georgia Public Service Commission approving additional sums on power purchase agreements ("PPAs") with affiliate companies who earn a regulated rate of return on the underlying generation asset because the Company has never had such a PPA before." Providing GPC an additional sum on this PPA is tantamount to allowing Southern Company to earn on the same asset twice, from two different regulated customer bases, which is inappropriate and such a precedent should not be set in this case.

[18] Order filed in Mississippi Docket No. 2018-AD-145, dated December 17, 2020. https://www.psc.state.ms.us/InSiteConnect/InSiteView.aspx?model=INSITE_CONNECT&queue=CTS_ARCHIVEQ&docid=655509

G. THE PLAN IS NOT RESILIENT TO FUTURE RISKS OF FUEL PRICE VOLATILITY AND ENVIRONMENTAL REGULATIONS, AND IT OVERESTIMATES THERMAL RESOURCE CONTRIBUTION TO RESOURCE ADEQUACY.

DOD/FEA notes that a resource plan with more fossil generation does not automatically result in a more resilient and reliable system. Fuel diversity resulting in resilience to future fuel cost volatility and environmental compliance costs is an important component of resilience as well. Unfortunately the Company presents analysis that is easy to misinterpret, does not follow its own modeling, and does not adequately consider the impact of future regulation on balance, and therefore does not propose the most resilient plan possible. Further, the Company overestimates the resource adequacy value of thermal generation, assigning it very high accredited capacity values (often 100 percent) that do not reflect even normal amounts of forced outages, much less appropriately accounting for non-firm fuel contracts.

As a threshold matter, it is important to recognize that the idea that additional thermal generation results in a more resilient and better system for customers is based on outmoded planning concepts and does not position the Company well for the future. GPC's system does need a set of resource attributes, including capacity and energy, spinning reserve, ancillary services and others to ensure reliability, but these needs can often be met by different combinations of resources that offer different benefits to the system.

Further GPC's modeling does not appropriately test the resilience of each particular modeled capacity expansion plan to future environmental costs or fuel price volatility. In GPC's supplemental filing they did provide several expansion plans and net present value system cost results under varying assumptions, but these are easy to misinterpret without additional context.

To appropriately test a particular plan's resilience to volatile fuel costs, for example, it would have had to test different fuel prices *on the same capacity expansion* plan and then examine the range of results to understand how sensitive that plan is to changes in fuel price. The scenarios presented in GPC's supplement did not follow this guideline and thus comparing them directly provides stakeholders no meaningful takeaways.

Further, the Company's refusal to appropriately consider the risk of future environmental regulation and how that would impact the current proposed resource plan is short sighted. When asked to discuss how the company evaluated the potential impacts of pending Environmental Protection Agency Rule 111 changes - which would govern emissions reduction requirements from both existing and new coal and gas facilities - Company witness Grubb asserted that it was premature to consider these impacts because the rule had not yet been finalized. While it is true that the specific rule language is not yet final and may change, that is not an adequate response when proposing customers pay for a 1,400 MW, 40-plus year emitting asset. Importantly, in the capacity expansion plans where the Company does consider future potential carbon regulation costs or constraints, its own modeling selects far fewer emitting resource MW up to 2030 and far more BESS. This shows that a future system that incorporates more dispatchable batteries is more resilient to future environmental costs and ensures that customer resources are being spent on the most future-proof assets possible.

Finally, DOE/FEA notes that it is essential that the Company correctly estimate thermal resource resilience and contribution to load, especially during extreme weather events. It is incorrect to utilize 100 percent resource accreditation values for thermal resources, ignoring even basic standard forced outage rates much less the potential impact of correlated outages during critical events. Standard forced outage rates for conventional generators can average somewhere

between 5-10 percent,[19] and should be factored into Unforced Capacity (UCAP) values utilized in resource planning. Further, Southern Renewable Energy Association expert witness Olson highlights emerging best practices in considering ELCC as an appropriate measure for dispatchable resources in addition to variable renewable and duration limited resources. In his Direct Testimony, he states "...an emerging best practice is to use ELCC to estimate the capacity contribution of "firm" resources such as natural gas. The ELCC of a gas unit may differ from its Unforced Capacity or UCAP value because loss-of-load events tend to occur during periods with an unusually high number of resource outages; that is, the combined outage rate of the fleet during loss of load hours tends to be higher than the expected loss-of-load for any individual resource, or the combined outage rate for the fleet during normal hours."[20] If the Company does not begin accounting for these factors in its IRPs, it may propose plans that over-rely on thermal resources that experience outages at higher rates during extreme weather events and that will not adequately account for resiliency benefits of a diverse resource mix that includes clean resources.

H. PROPOSED ACTIONS THE COMMISSION CAN TAKE TO IMPROVE THE PLAN AND FUTURE IRPS

GPC and the Commission have a responsibility to its customers and to the State of Georgia to plan for a future system that is clean, affordable and resilient, and unfortunately the proposed capacity additions included in the stipulated settlement do not meet the mark. But the Commission has an opportunity to both right the ship in terms of outcomes for this IRP and

[19] As a guideline, NERC reports that average forced outage rates for conventional generators were over 8 percent in 2022, although we understand that individual system resources may vary based on age, availability of firm fuel, and other factors. *See* https://www.utilitydive.com/news/conventional-generation-outages-set-a-record-in-2022-nerc/653755/

[20] Direct Testimony of Dr. Arne Olson, at 10.

setting a framework for future IRPs to result in more appropriate resource proposals that will position the Georgia economy better for the cleantech manufacturing future to which it aspires.

I. THE COMMISSION SHOULD AUTHORIZE AN INCREMENTAL 1,000 MW OF SOLAR PROCUREMENT THROUGH THE ONGOING CARES RFP AND REJECT ADDITIONAL SUMS ON THE MPC AND SANTA ROSA PPAS

First, the Commission should authorize GPC to procure at least 1,000 MW of incremental solar or solar-plus-storage capacity through its existing RFP, consistent with the motion DOD/FEA submits alongside this brief. Doing so would have multiple benefits. It would allow customers who want to choose clean energy to receive more of their energy from CFE resources; in particular with a substantial amount of new load coming on the system from companies with stated CFE and decarbonization goals as well as existing customers like DOD/FEA, local governments, and many CEBA members, the Company's proposed IRP will set all customers back on their decarbonization goals with respect to system resources. As such, CARES and any other CFE opportunities the Company makes available are likely to be oversubscribed in its first tranche if this amount is not increased. Further, procuring incremental solar resources would be consistent with the Company's own Base Case modeling, which calls for over 700 MW of incremental solar resources as a matter of course, even before considering potential impacts of higher gas prices or future environmental regulation. Further, CARES has the benefit of ensuring all costs incurred for new resources are paid for by participating customers, and thus other customers without clean energy goals will not be subject to increased costs as a result. Authorizing incremental solar procurement now - via a program that will be fully paid for by participating customers and that will not affect the remaining customer base - is a least-regrets move the Commission can take to at least partially offset the impacts of the Plan to customers' carbon footprint.

Second, if the Commission is to approve the MPC and Santa Rosa PPAs, it should reject additional sums in all years of the PPAs as unnecessary and inappropriate incremental costs to existing customers. As noted above, the Company has made much of the essential need for these PPAs to serve new anticipated system load and that the urgency of these needs made a competitive acquisition impossible. If this is the case, then the Company needs no additional incentive to procure these resources. Further, it is inappropriate for GPC customers to pay an additional sum on assets that other Southern Company customers are already paying for in base rates in another state. Rejecting the additional sum will help ensure that the acquisition of these resources is not financially harmful to GPC customers even if the magnitude of load the Company projects does not materialize in the timeframe expected.

J. THE COMMISSION SHOULD REQUIRE MODELING REFORMS AND ADDITIONAL REPORTING IN THE COMPANY'S NEXT IRP

In alignment with the recommendations made by other parties to this docket, DOD/FEA believe that GPC can do better to improve alignment between its modeling and the ultimately proposed Plan, as the most prudent path forward in light of all evaluated opportunities and risks. These recommendations span modeling inputs, scenario analysis and outputs, and reporting requirements.

As noted in the testimony of several intervenors, the Company inappropriately relied on outdated studies for key inputs to its modeling and proposed plan - in particular the Planning Reserve Margin. Especially given the magnitude of new, high load factor customers upon which the Company has based this interim IRP request, the PRM study should have been refreshed to incorporate new load shapes and updated capacity costs and used to either revise or re-validate the Company's proposed PRM (which, it should be noted, is not a settled matter in this

proceeding). A PRM as high as 26 percent in the winter has significant impacts on the types and magnitude of resources proposed and this core assumption should be more thoroughly vetted. Further, if these inputs will not be refreshed, the Company should provide well-reasoned justifications for why that will not result in negative outcomes for customers. Lack of time is not an appropriate justification when the outcome of an IRP will be thousands of new, emitting resources that will be recovered in customer rates.

Record testimony indicates that Georgia Power did not appropriately capture the increased capacity value of solar and battery storage when added in combination, relative to their standalone values, and thus undervalued the solar and storage resources modeled relative to other types of generation. As Mr. Olson notes, GPC's capacity limits on renewable energy and energy storage are arbitrary and unsupported by technical or economic feasibility studies. Mr. Olson recommends that GPC assign solar resources a calculated ELCC value consistently across its modeling practices that is informed by its ELCC study. With respect to the proposed stipulation's approval of the MPC PPA and the Santa Rosa Energy Center PPA, Mr. Olsen notes that the results of GPC's RFI indicated that GPC could potentially have met its near-term needs with energy storage or solar in the 2025-2028 period, but that the lack of a standard, regular, competitive bid solicitation process disallowed any opportunity for GPC to explore the optimal solution to meet their needs by evaluating bids alongside each other or in relation to the MPC and Santa Rosa PPAs. DOD-FEA respectfully requests that the Commission include in any final order in this docket a directive to GPC to clearly demonstrate in its next IRP filing that it appropriately accredits the capacity value of CFE and considers CFE solutions along with other resource options on a fair and equal footing.

The Commission should further clarify how ELCC for variable renewables and duration limited resources is to be used to ensure the Company appropriately applies it to its planning. Finally, as discussed above, the Company should more appropriately account for thermal asset forced outage rates in its resource accreditation values. If these are not incorporated, the Company risks overestimating its thermal resources' contribution toward meeting load requirements, especially during winter weather events.

K. THE COMPANY SHOULD PRESENT A CLEAR AND DOCUMENTED COMPARATIVE SCENARIO ANALYSIS IN ITS NEXT IRP, INCLUDING ANY PROPOSED COAL RETIREMENT CHANGES

In addition to input analysis improvements, the Commission should require GPC to provide additional, publicly available data on various scenario analyses and both the capacity expansion and cost differences between these scenarios, how to interpret the different results, and how they relate to the plan the Company ultimately puts forward. This is essential if the Company proposes to postpone its previously approved coal retirements.

The Company did not present clear and coherent scenario analysis. The Company needs to provide additional modeling scenarios and sensitivities that isolate impacts of variable changes so parties and the Commission can understand cost and risk deltas between the Company's proposed Base Case scenario and alternate cases. DOD/FEA makes the following recommendations:

- Require GPC to model different expansion plans when underlying load or resources are varied (i.e. different load sensitivities and current plant retirement dates, PRMs or ELCC inputs, etc.)
- Require GPC to model different operational cost inputs - such as fuel prices or carbon regulation compliance costs - on the same capacity expansion plan, to isolate the impacts of potential future uncertainty on each modeled capacity expansion plan

- Provide a thorough, publicly available accounting of all input assumptions and net present value system costs, resulting capacity and energy dispatch mix, explanations of how each scenario and sensitivity varies from the Base Case, and additional context regarding how to interpret differences in system costs or operational outputs
- In any case where the Company is proposing to postpone previously approved coal retirement dates, require that the company perform a specific alternatives analysis that allows parties to assess the cost and performance of an alternate future in which the coal facility's resource attributes are replaced with non-emitting generation resources and/or transmission investments.

If the Commission requires this enhanced analysis and information, Staff and parties will be better able to vet the results and trust that GPC is putting forward the best possible plan for the future of its system and customers.

CONCLUSION

The Department of Defense, on behalf of itself and all other Federal Executive Agencies, appreciates the work conducted by the Company, Staff and stakeholders during this IRP process and thanks the Commission for the opportunity to provide input in alignment with federal clean energy objectives. While there are some positive aspects of the IRP GPC put forward - including incremental BESS procurement, the Moody and Robins AFB projects, and new demand-side programs, we believe the Company can do better both in this plan and in future planning processes. DOD/FEA respectfully request the Commission include our motion to authorize incremental solar and/or solar-plus-storage hybrid procurement in the currently open CARES RFP, to minimize the harm that existing customers with CFE goals will experience from the proposed settlement as it currently stands. DOD/FEA also request that the commission consider procedural modifications for the next and future IRPs, including updated inputs and analysis, more transparent scenario analysis, and required pre-filing customer outreach. These

modifications will help ensure the State of Georgia is set on a path to a clean, affordable and resilient electric system and better position it for strong economic growth.

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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
john.j.mcnutt.civ@army.mil

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing Post Hearing Brief of the United States Department of Defense and all other Federal Executive Agencies was filed on 4 APRIL 2024 in Docket No. 55378 with the Georgia Public Service Commission's Executive Secretary and electronically mailed to all parties of record in this proceeding.



John J. McNutt