EXHIBIT "A"

PUBLIC DISCLOSURE

STATE OF SOUTH CAROLINA,

BEAUFORT COUNTY:

AFFIDAVIT OF HOWARD M. SMITH

Personally appeared before me, the undersigned officer duly authority to administer oaths, HOWARD M. SMITH, who upon being duly sworn, deposes and states as follows:

1.

I reside at 30 Hammocks Oak Circle, Hilton Head, Beaufort County, South Carolina 29926. I am over the age of eighteen (18) years and competent to testify to the matters contained herein. I am aware that this affidavit will be used in support of "RGP BOWMAN SOLAR, LLC'S REPLY TO GEORGIA POWER COMPANY'S RESPONSE TO EMERGENCY PETITION FOR EXTENSION OF TIME AND PETITION FOR DECLARATORY RULING ON INTERCONNECTION COSTS FOR A QUALIFYING FACILITY" pending before the Georgia Public Service Commission (the "Commission") in Docket 4822, and I consent to its use therein and for any other purpose permitted by law.

2.

I attended Clemson University from 1973 – 1977. I graduated with a Bachelor of Science degree in Electrical and Computer Engineering in May 1977.

3.

I am currently self-employed with Renewable and Grid Edge Technology Consulting, LLC, a South Carolina Limited Liability Company, maintaining its principal place of business at 30 Hammocks Oak Circle, Hilton Head, South Carolina 29926. I have been the Managing Member of the LLC since its creation in 2020. I consult with individuals and businesses seeking to deploy

interconnection issues with the Company and Bowman's QF Facility through the Georgia Power and Southern Company Systems ("SCS") processes for interconnection.

6.

Along with me, Mr. Sol Haroon, an electrical engineer, Technical Director of Renewables at McKim & Creed and a consulting instructor at the Georgia Institute of Technology in sustainable architecture and renewables was also hired in April 2022 because of his expertise in photovoltaic systems and renewable power systems. He was tasked with coordinating project data required by Georgia Power's SIMPL software, used to evaluate interconnection requirements for QF projects.

7.

Later, Mr. John Kelley, JBK Consulting, LLC was retained in early 2024 to analyze the interconnection costs identified in Georgia Power's interconnection studies. He was Director, Forecasting and Resource Planning for Alabama Power for fifteen (15) years before retirement. Together, Mr. Haroon, Mr. Kelley and me formed Bowman's interconnection team.

8.

After being retained, I promptly commenced work, attempting to contact Georgia Power and SCS personnel. But, I experienced difficulty in making contact for several matters.

9.

In late December 2021, Georgia Power advised Bowman that it was developing a new, simpler and less expensive process for interconnecting Energy Only QFs. It also described to us its new SIMPL software that it would use to evaluate interconnection costs. We were told that Georgia Power expected that its new QF interconnection procedures would be approved by the Commission in early 2022, and it asked Bowman to delay its interconnection request until that was complete. Georgia Power assured Bowman that its project would be given a new queue position.

Bowman agreed to Georgia Power's request, and interconnection studies for its QF Facility were delayed.

10.

Several months later, the Company advised Bowman that a description of the required tasks and fees to commence interconnection would be forthcoming. Bowman paid the initial fees. But, it did not receive a follow up response from SCS, and Bowman's check had not cleared. Following a call with Mr. William Houser, Bowman's fee payment check was processed. Bowman's QF Facility was assigned project number GPCQF-1034 and given a queue position.

11.

Georgia Power and SCS conducted a standard project kick-off meeting with Bowman on May 16, 2022 which I attended on site. We met at Bowman's proposed the Point of Interconnection ("POI") to Georgia Power's system. Bowman showed the proposed locations of its QF Facility and POI at or near the Bio Substation to Georgia Power.

12.

Georgia Power and SCS attendees asked Bowman to move the POI to the Bio-Center 230kv line to benefit the Georgia Power's transmission system. They reported that the movement would help resolve grid issues in the area. With the POI relocated, Company/SCS personnel indicated that the facility could benefit the Company and improve grid problems occurring nearby. Bowman agreed to cooperate with the Georgia Power's request and move the POI.

13.

By late Spring, 2022, Georgia Power's new QF-TGIP and QFIA received Commission approval. But, Georgia Power's SIMPL program was not fully vetted, and the online forms required for project data input were still under development.

14.

Mr. Haroon provided Georgia Power with the project's single line drawing and site plan. He also filled in the SCS interconnection forms for Bowman's QF Facility. The single line drawing and site plan went through several revisions. An additional substation near the Vanna line was requested by Georgia Power, and Bowman agreed to add it. Georgia Power's online form and required documentation were an evolving process, and multiple changes requested by Georgia Power required tweaks to the SIMPL program. Each time the Company requested a change, modification of program inputs was required.

15.

We continued to cooperate with Georgia Power as it worked the kinks out of SIMPL, though interconnection of Bowman's QF Facility experienced more delay. When the Company's SIMPL program was ready, Mr. Haroon input Bowman's interconnection data. There was a particularly important problem: SIMPL was not formatted to allow information on the BESS project to use data to be impact and uploaded. This caused significant delay. Finally, Bowman entered into a QF Interconnection Study Agreement for GPCQF-1034 on December 15, 2022

16.

The QF Study Phase I ("Phase I") was issued to Bowman on March 24, 2023. But, it was revised in Phase I v.2 on March 30, 2023. Phase I demonstrated that Bowman's QF Project could [redacted] But, Bowman's QF Facility [redacted]

17.

After several meetings with Georgia Power and with growing frustration, Mr. Haroon, through McKim & Creed, hired Enerzink, a company with significant experience in completing dynamic models for interconnection. Finally, [redacted].

18.

Mr. Haroon and I raised these issues on behalf of Bowman with the Commission's Staff. Georgia Power, Bowman and Staff agreed to rerun Bowman's data in SIMPL on a finalized submission form. Data was re-input in SIMPL on September 15, 2023. Bowman's QF Facility's data passed Phase I on October 19, 2023.

19.

With the Phase I study complete, Bowman's project could proceed to Phase II. Phase II study results were provided to Bowman on January 8, 2024 – more than two years after I made the first inquiry to Georgia Power seeking interconnection.

Further, Affiant saith not.

Howard M. Smith
HOWARD M. SMITH

Sworn to and subscribed before me
This 13 day of June, 2024.

Jennifer D. Dean, Notary Public

My Commission expires: My Commission Expires June 9, 2030

JENNIFER D. DEAN NOTARY PUBLIC SOUTH CAROLINA

EXHIBIT "B"

PUBLIC DISCLOSURE

STATE OF ALABAMA,

SHELBY COUNTY:

AFFIDAVIT OF JOHN B. KELLEY

Personally appeared before me, the undersigned officer duly authority to administer oaths, JOHN B. KELLEY, who upon being duly sworn, deposes and states as follows:

1.

I reside at 117 Elyton Drive, Birmingham, Alabama, 35242. I am over the age of eighteen (18) years and competent to testify to the matters contained herein. I am aware that this affidavit will be used in support of "RGP BOWMAN SOLAR, LLC'S REPLY TO GEORGIA POWER COMPANY'S RESPONSE TO EMERGENCY PETITION FOR EXTENSION OF TIME AND PETITION FOR DECLARATORY RULING ON INTERCONNECTION COSTS FOR A QUALIFYING FACILITY" pending in Docket 4822 before the Georgia Public Service Commission (the "Commission"), and I consent to its use therein and for any other purpose permitted by law.

2.

I attended the University of Illinois and graduated in 1983 with a Bachelor of Science degree in electrical engineering (BSE). I received a Master of Business Administration degree (MBA) in 1987 from the University of Alabama at Birmingham.

3.

I am presently the managing partner of JBK Energy Consulting, LLC. (JBK) I have been the Managing Member of JBK since its creation in 2024. Through JBK, I consult with individuals and businesses seeking advice and assistance on a variety of energy-related issues.

4.

I began my career in 1983 with Southern Company as an engineer in the transmission planning department of Southern Company Services (SCS), where I spent over 3 years conducting load-flow studies of the economic expansion of the Southern Electric system. I then worked in various departments in SCS system planning, along with a two-year stint as a consultant with the former Southern Electric International. While working in SCS generation planning, I developed the Incremental Capacity Equivalence factor (i.e., the ICE factor), a concept that is still in use today within SCS system planning.

5.

In 1990, I joined Alabama Power's marketing department, with supervisory responsibilities over project analysis. I later served as the manager of Marketing Services within that organization, with responsibilities that included the development of retail market plans, economic evaluations, and mass marketing programs. In the 1990s, I led a successful effort to develop a series of cogeneration projects with large industrial retail customers, most of which are still active today.

6.

In 2008, I was named Director of Forecasting and Resource Planning, and assumed direct responsibility for the Integrated Resource Plan, which includes the identification of timely and cost-effective additions, expansions, and modifications to Alabama Power's portfolio of resources. In this capacity, I have also been responsible for the demand, energy, and customer forecasts; and developed a customer renewable subscription program – one of the first of its kind the industry.

7.

More recently, I served as the lead Alabama Power Company witness in proceedings before the Alabama Public Service Commission that culminated in the construction of the Barry Unit 8

combined cycle facility and the acquisitions of the Central Alabama combined cycle and the Calhoun Power combustion turbine facilities. I retired from Alabama Power in 2023, capping 40 years of employment with Southern Company.

8.

JBK was engaged by Mr. Neville Anderson to consult on the development of the QF Facility involving a 76.53 MW solar photovoltaic ("PV") generation facility (the "QF Facility") and 9.72 MVA Battery Energy Storage System ("BESS") on approximately 342 acres (the "Subject Property") located at 2375 Georgia Highway 172, Bowman, Elbert County, Georgia 30624.

9.

I was retained largely due to my significant employment experience within Southern Company and Alabama Power, expertise in integrated resource planning, transmission and development, in an effort to analyze the interconnection costs identified in Georgia Power's interconnection studies. I work alongside Howard Smith and Mr. Sol Haroon, an electrical engineer and Technical Director of Renewables at McKim & Creed, and a consulting instructor at the Georgia Institute of Technology in sustainable architecture and renewables stem, as part of Bowman's interconnection team.

10.

I have reviewed and analyzed the QF Study Phase I ("Phase I") which was completed on March 24, 2023. I have also reviewed and analyzed the revised QF Study Phase I v.2 dated March 30, 2023. And, I have reviewed and analyzed the QF Study Phase II ("Phase II") which was completed on January 8, 2024. It is my professional opinion that the costs being assessed to Bowman for interconnection are unreasonable, as discussed more fully below.

11.

The first concern I raise is why the Company is requiring Bowman to pay for transmission service constructed to serve a capacity resource when its QF Facility will be an energy-only generator? Despite its BESS, Bowman's QF Facility is relegated to being an energy only generator, which is not being constructed or accounted for by the Company as a capacity resource. Therefore, it is not necessary for Bowman's QF Facility to require capacity transmission service, and Bowman should not be charged for expensive network upgrades required for that purpose.

12.

Indeed, the Company may simply employ communications and procedures that require Bowman's QF Facility to reduce generation if a transmission line begins to overload or is out of service. Once directed, reduction in Bowman's QF Facility generation will decline to the point that there is no overload on the Company's transmission system. For this very reason, transmission sufficient for a capacity resource is not required for Energy Only generators. Even simpler, the Company can implement operating procedures that allow Bowman's QF Facility to curtail or reduce generation in the event of a transmission line outage and/or line loading problem. A ballpark estimate of this proposed fix would be approximately $1 million.

13.

The Company is requiring Bowman to pay for transmission upgrades for a capacity resource. The Company's rules define a "QF Interconnection Study" as a "***[s]tudy conducted by GPC to evaluate the impact of the proposed QF interconnection on the safety and reliability of the Electric System and firm delivery of the QF's output to GPC's native load.***" (Emphasis added). However, Bowman will enter into a "Standard Contract for the Purchase for Non-Firm Energy from a [QF]" with the Company. As the name indicates, Bowman's contract with the

Company will require the Company to purchase non-firm power, meaning Bowman can schedule to sell power to the Company when it wants. Since the Company will make no capacity payment to Bowman, Bowman should not be forced to pay costs for interconnection as if it is a capacity resource.

14.

In its Phase I and Phase II studies, the Company [redacted] In the Phase II Study, [redacted] the Company requires payment from Bowman.

15.

The Company's Phase II study evidences the Company's intent to [redacted], with the result that they will at least be slightly loaded above 100% by year 2033. The Company then burdens Bowman's QF Facility with responsibility for the entire cost of all improvements, despite the current load on the lines for which Bowman bears no responsibility.

16.

The Company's approach ignores that [redacted] due to new development along the northeast I-85 corridor and Georgia Power's unprecedented load growth. This would require prompt improvement of these transmission lines even in the absence of development of Bowman's QF Facility. Since the

transmission lines will have to be upgraded anyway, it would be more accurate to ascribe only the advancement cost of the transmission improvements to Bowman. Taking this proper approach, [redacted].

17.

In order to be certain, transmission studies should be conducted in the absence of the Bowman QF Facility that go beyond 2033, which would specifically identify [redacted] and then ascribe the advancement cost to the project rather than the total cost. This is referred to as using the economic carrying charge approach. The economic carrying charge methodology is consistent and well-documented within electric utility economic evaluations and is common practice across a wide variety of project evaluations, and should most certainly be applied here.

18.

Another key consideration that is missing from (but should be included in) the Company's studies is: what amount of megawatts will be generated from the QF Facility and when? In Phase I, the QF Facility was modeled at full output of 77 MW and for summer peak load conditions. However, summer peak load normally occurs in the late afternoon and peak solar generation occurs midday. Bowman's QF Facility will not be generating at its maximum amount of output of 77 MW when the load demand is at its greatest. For example, if the solar facility is generating 46 MW in late afternoon– a 40% reduction simply due to where the sun resides in the sky - then the lines that have been identified as loading would not be carrying as much generated power and may not be overloaded at all. The studies did not consider this, but it merits consideration and review

by the Commission. In the Paragraphs below, I will address each contingency identified in the interconnection studies.

19.

Contingency 1: [redacted].

This contingency accounts [redacted] for which the Company holds Bowman wholly responsible. Reviewing the one-line diagram in the interconnection study and a satellite view of the proposed POI, [redacted]

The estimated cost of this upgrade is [redacted]

20.

A simpler and cheaper option would rely on operating procedures that direct Bowman's QF Facility to curtail or reduce operation in the event of a transmission line outage and/or line loading problem. Since Bowman's QF Facility will be energy only and is not accounted for as firm capacity, it is not necessary for this to have capacity transmission at any cost. [redacted]

21.

Contingency 2: [redacted].

According to the Phase II study, Bowman's QF Facility [redacted] This begs the question of why this is this being shown as a required upgrade in

the study [redacted] of Bowman's QF Facility. In such case, the contingency is not caused by Bowman's QF Facility at all and should not therefore be Bowman's responsibility.

22.

Contingency 3: [redacted]

It is my understanding that this [redacted] From the Phase II study, it appears that Georgia Power requires Bowman to [redacted]? Presumably, this contingency developed due to the load growth in North Georgia, requiring this line to be upgraded anyway – in the absence of Bowman's QF Facility. It would be my recommendation to use the economic carrying charge for this line to cover the advancement cost and not [redacted] I question GPC's requirement for such a significant capital outlay for this facility.

23.

Contingency 4: [redacted]

Like Contingency 2, above, the Phase II study shows that [redacted] Bowman's QF Facility is [redacted] and it begs the questions: why is this contingency included in the study, and why is the cost of the upgrade imposed solely on Bowman?

_____

JOHN B. KELLEY

Sworn to and subscribed before me
This _____ day of June, 2024.

Notary Public _____

My Commission expires: _____

JOHN B. KELLEY

Sworn to and subscribed before me
This 12 day of June, 2024.

Notary Public _____

My Commission expires: 10-19-2027

