BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
Georgia Power Company's	)	
2023 Integrated Resource Plan Update	)	**Docket No. 55378**
Application for Certification of	)	
Plant Yates Units 8-10	)	

APPLICATION FOR LEAVE TO INTERVENE OF
SIERRA CLUB AND SOUTHERN ALLIANCE FOR CLEAN ENERGY

COMES NOW, the Sierra Club and Southern Alliance for Clean Energy (SACE), pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Commission Rule 515-2-1-.06, and hereby files this Application for Leave to Intervene ("Application") in the above-referenced dockets. In support hereof, Sierra Club and SACE respectfully shows as follows:

1. Sierra Club is the nation's oldest and largest grassroots environmental organization, with members across the country, including approximately 10,000 in Georgia. Sierra Club's mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's resources and ecosystems; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. As part of this mission, Sierra Club works on behalf of its members to help transition the power generation industry away from fossil fuels and towards a clean energy economy. Additionally, Sierra Club members purchase electricity from Georgia Power. Their consumption, costs, and terms of service for purchase of electricity may be affected by the Commission's actions in this docket. As a result, Sierra Club has substantial interests in the outcome of this proceeding and desires to intervene in order to protect those interests.

2. SACE is a 501(c)(3) nonprofit organization whose purpose is to promote responsible and equitable energy choices to ensure clean, safe, and healthy communities throughout the Southeast. SACE is incorporated in Tennessee and is registered as a nonprofit corporation in Georgia. SACE has an office and staff in Atlanta and operates in Georgia, Tennessee, Florida, North Carolina and South Carolina. SACE and its members are interested in promoting greater reliance on clean, low-cost resources to meet the Southeast's energy needs. ACE conducts education programs and research concerning environmental, public health, and economic impacts of energy use and policy, and advocates for energy resource plans and policies that best serve the public health and economic interests of communities in Georgia and throughout the Southeast. SACE has an interest in this proceeding both on its behalf and on behalf of its members. Georgia Power is the electric provider of many of its members in Georgia who are subject to the impacts of Georgia Power's cost of electricity. SACE and its members' interests in this proceeding are germane to SACE's purpose of advocating for energy resource plans, policies, and systems that best serve the environment, public health, and economic interests of communities in Georgia and throughout the Southeast. The rights and interests of SACE and its members will be substantially affected by decisions made by the Commission in this docket

3. On October 27, 2023, Georgia Power filed with the Commission its 2023 Integrated Resource Plan Update. On January 31, 2024, Georgia Power filed for certification of three new self-build combustion turbine ("CT") units at Plant Yates. On April 26, 2024, the Commission issued an *Order Adopting Stipulated Agreement* that approved the three new CT units at Yates as part of an array of assets to meet growing demand. On May 8, 2024, the Commission approved a procedural and scheduling order ("PSO") in this

docket for the certification proceeding for the three CT units. Pursuant to the PSO, Sierra Club and SACE timely file this Application to participate in the above-referenced docket.

4. Sierra Club and SACE respectfully request that it be granted leave to intervene and participate fully as a co-intervening party in these proceedings, including the right to present testimony and exhibits, cross- examine witnesses, and file briefs because their rights and interests cannot be adequately represented by any other party to the above-styled docket. Sierra Club and SACE are particularly interested in the responsible transition away from fossil fuel-based electric generating plants towards meeting electricity demand with clean energy. Sierra Club and SACE have not yet determined the extent of its participation in this certification proceeding.

5. Additionally, Sierra Club and SACE's participation in this matter will not unduly delay these proceedings or prejudice any other party. Sierra Club previously applied for leave to intervene in the 2019 and 2022 Georgia Power Company Rate case dockets, the 2022 and 2023 Georgia Power Company Integrated Resource Plan, and the 2023 Fuel Cost Recovery dockets. Those applications were granted. SACE has intervened in numerous proceedings before this Commission since 2003. Among the many Commission proceedings in which SACE has intervened and actively participated are the semi-annual reviews of Plant Vogtle Units 3 and 4 in Docket 29849, Georgia Power's application for approval of its 2010 IRP and certification of DSM programs from the 2010 IRP; Capacity and energy payments to co-generators under PURPA in Docket 4822; Georgia Power's 2011 application for decertification of Plant Branch Units 1 and 2 and Plant Mitchell Unit 4C, application for the certification of the power purchase agreements with BE Alabama, LLC from the Tenaska Lindsay in Docket 34218; Georgia Power's Advanced Solar Initiative; the Plant Mitchell conversion; the DSM Working Group; Georgia Power's

2013 IRP and certification of DSM programs from the 2013 IRP; Georgia Power's 2016 IRP and application for the decertification of Plant Mitchell Units 3, 4A and 4B, Plant Kraft Unit 1 CT and Intercession City CT and certification, decertification and amended DSM plan from the 2016 IRP; the 2019 Georgia Power IRP and DSM plans in Dockets 42310 and 42311; the 2022 IRP and DSM plans in Dockets 44160 and 44161; the 2022 Rate Case in Docket 44280; and the 2023 Fuel Cost Recovery Docket.

6. Sierra Club and SACE respectfully 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:

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Respectfully submitted this _____ day of June, 2024.



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VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

Curt Thompson personally appeared before the undersigned Notary Public and stated under oath that he is Curt Thompson, and that he is authorized by Sierra Club and SACE to execute this verification on its behalf, and that the facts alleged in the foregoing Application for Leave to Intervene are true and correct to the best of his information, knowledge and belief.

This 12th day of June, 2024.

Curt Thompson

Sworn and subscribed
before me this 12th day
of June, 2024.

Notary Public
My Commission Expires

RICHARD PAUL DUNCAN III
NOTARY PUBLIC
GWINNETT COUNTY, GEORGIA
COMMISSION EXPIRES JANUARY 11, 2028

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CERTIFICATE OF SERVICE

I do hereby certify that I have served the following parties with the foregoing **APPLICATION FOR LEAVE TO INTERVENE OF THE GEORGIA ASSOCIATION OF MANUFACTURERS,** via electronic mail to all parties in this docket.

This 7th day of June, 2024.

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