SOUTHERN ENVIRONMENTAL LAW CENTER

Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Telephone 404-521-9900
Facsimile 404-521-9909

June 13, 2024

VIA ELECTRONIC DELIVERY

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

Re: Application for Leave to Intervene on Behalf of Georgia Interfaith Power & Light; Docket No. 55378

Dear Ms. Tanner:

Please find enclosed an electronic version of the following **Application for Leave to Intervene** to be filed in Docket No. 55378 on behalf of Georgia Interfaith Power & Light.

Respectfully submitted,

Bob Sherrier
Staff Attorney
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
404-521-9900
bsherrier@selcga.org

Counsel for GIPL

STATE OF GEORGIA

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

APPLICATION OF GEORGIA INTERFAITH POWER & LIGHT FOR LEAVE TO INTERVENE

Georgia Interfaith Power & Light ("GIPL"), through counsel, hereby applies to the Georgia Public Service Commission ("Commission") for leave to intervene in the above-referenced docket pursuant to O.C.G.A. §§ 46-2-59 and 50-13-14 and Commission Rule 515-2-1-.06. In support of this application, GIPL respectfully shows the Commission as follows:

1.

On January 31, 2024, Georgia Power Company filed its Application for Certifications of three self-build combustion turbines at Plant Yates, for which it seeks Commission approval.

2.

This application for leave to intervene is timely filed pursuant to the Commission's Procedural and Scheduling Order.

3.

Georgia Interfaith Power & Light is a 501(c)(3) nonprofit organization headquartered in Decatur, Georgia. GIPL represents the interests of communities of faith in promoting environmental justice, energy conservation, energy efficiency, renewable energy, and related sustainable practices. GIPL engages faith communities in the stewardship of Creation. GIPL is a

growing organization with more than 350 member congregations across the state of Georgia representing a wide variety of faiths and over 100 congregationally based Green Teams working to advance GIPL's objectives. While several of GIPL's participating congregations are located throughout the Atlanta metropolitan area, many are located in other areas of the State, including the Savannah, Macon, Augusta, Acworth, Athens, Gainesville, Sautee-Nacoochee, Dalton, Clayton, Carrollton, Newnan, Roswell, Ellijay, Kennesaw, Covington, Warner Robbins, and Canton areas.

4.

GIPL has an interest in the Application for Certification of Plant Yates Units 8-10 both on its own behalf and on behalf of its members. Many of GIPL's participating congregations and members of those congregations purchase electricity from Georgia Power Company, both for their places of worship and for their individual residences. Their costs for electricity will be affected by the Commission's actions in this docket.

5.

Additionally, GIPL's core mission is to promote the responsible use of God's Creation by advocating for and educating its communities concerning the production of electricity sustainably, using less electricity through energy efficiency measures, and minimizing the impact of resource decisions on vulnerable communities. GIPL's mission is thus directly implicated by Georgia Power's self-building of new fossil-fueled resources without testing them against the market. GIPL's mission is further implicated by the extent to which the Commission and Georgia Power's process for choosing electric resources is transparent and accessible, to provide for member education and engagement in these important policy choices. GIPL intends to address the concerns of both itself and its members regarding how Georgia Power's proposal—and Georgia Power's

and the Commission's processes—impact both God's Creation and the resulting bills that customers, and in particular low-income customers, pay. As a result, GIPL has substantial and vital interests in the outcome of these proceedings and seeks to intervene to protect these interests. No other party in this case shares GIPL's unique interests.

6.

In furtherance of its interests and on behalf of its members, GIPL has intervened in many prior proceedings before the Commission, including: Georgia Power's 2023 Integrated Resource Plan Update, Docket No. 55378; Georgia Power's 2022 Rate Case, Docket No. 44280; Georgia Power's 2022 Integrated Resource Plan ("IRP") and Demand-Side Management Plan ("DSM") proceedings, Docket Nos. 44160, 44161; Georgia Power's 2020 PURPA Avoided Cost proceedings, Docket Nos. 4822, 16573, 19279; Georgia Power's 2019 Base Rate Case, Docket No. 42516; Georgia Power's 2019 IRP and DSM proceedings, Docket Nos. 42310, 42311; the 2017-2018 DSM Working Group and the 2014-16 DSM Working Group, Docket Nos. 41253, 38401; Georgia Power's 2016 IRP and DSM proceedings, Docket Nos. 40161, 40162; Georgia Power's Application for Certification of a Green Energy Program and Green Energy Pricing Tariff, Docket No. 16573; Georgia Power's 2015 and 2016 Advanced Solar Initiative Prime, Docket No. 38877; the Notice of Inquiry and Workshop to Examine Issues Related to the Value of Renewable Resources and Distributed Energy Resources, Docket No. 39732; Georgia Power's 2010 IRP and DSM proceedings, Docket Nos. 31081, 31082; and Georgia Power's Seventeenth, Eighteenth, Nineteenth, Twentieth/Twenty-First, Twenty-Second, Twenty-Third, Twenty-Fourth, Twenty-Fifth, Twenty-Sixth, Twenty-Seventh, Twenty-Eighth, and Twenty-Ninth Semi-Annual Construction Monitoring proceedings, Docket No. 29849.

7.

The interests of GIPL and its participating congregations are not adequately represented by other parties to these proceedings. Other parties that have applied to intervene do not have interests similar to those of GIPL. The applicant's intervention would not unduly delay the proceedings or prejudice the rights of other parties.

8.

If this application is granted, GIPL, through its counsel, intends to participate fully as a party in this docket, including cross-examining witnesses, and filing proposed orders and/or briefs.

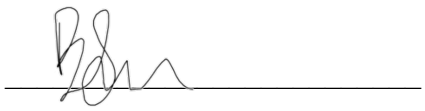
9.

GIPL respectfully requests that the following persons receive all notices, correspondence and copies of orders and other materials in this docket, and be placed upon the official service list:

Bob Sherrier
Jennifer Whitfield
Bailey Shea
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
P: (404) 521-9900
F: (404) 521-9909
bsherrier@selcga.org
jwhitfield@selcga.org
bshea@selcga.org

WHEREFORE, GIPL respectfully requests that the Commission grant this application for leave to intervene and admit it as a full party of record in these proceedings with all rights attendant thereto.

Respectfully submitted this 13th day of June, 2024.



Bob Sherrier
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
P: (404) 521-9900
F: (404) 521-9909
bsherrier@selcga.org

Counsel for GIPL

VERIFICATION

STATE OF GEORGIA

COUNTY OF FULTON

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, **Bob Sherrier**, who, after being duly sworn, deposes and says he is Counsel for Georgia Interfaith Power & Light and that the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of his information and belief.

This 12th day of June, 2024.

Bob Sherrier

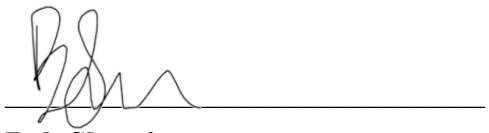
Sworn to and subscribed before me
this 12th day of June 2024.

Notary Public

Catherine M Crafa
NOTARY PUBLIC
Cobb County, GEORGIA
My Commission Expires 07/13/2027

CERTIFICATE OF SERVICE

I certify that the foregoing **Application of Georgia Interfaith Power & Light for Leave to Intervene** in Docket No. 55378 was filed with the Public Service Commission by electronic delivery on the 13th of June, 2024 An electronic copy of same was served upon all parties listed below by electronic mail as follows:



Bob Sherrier

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
stanner@psc.ga.gov

Jamie Barber
Preston Thomas
Robert Trokey
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
jamieb@psc.ga.gov
pthomas@psc.ga.gov
rtrokey@psc.ga.gov

Steven Hewitson
Brandon Marzo
Allison Pryor
Troutman Pepper
Nations Bank Plaza
600 Peachtree Street, NE, Suite 3000
Atlanta, Georgia 30308
steven.hewitson@troutman.com
brandon.marzo@troutman.com
allison.pryor@troutman.com

Mark Vinson
Georgia Power Company
241 Ralph McGill Boulevard, NE
Atlanta, Georgia 30308
mvinson@southernco.com

Charles B. Jones, III
Lloyd Avram
Georgia Association of Manufacturers
The Hurt Building
50 Hurt Plaza, Suite 1620
Atlanta, Georgia 30303
404-688-0555
cjones@gamfg.org
lavram@gamfg.org

Jeffry C. Pollock
J. Pollock Incorporated
14323 South Outer 40 Road, Suite 206N
Town and Country, MO 63017-5734
314-878-5814
jcp@jpollockinc.com

William Bradley Carver Sr. Esq.
Hall Booth Smith, P.C.
191 Peachtree Street, NE
Suite 2900
Atlanta, Georgia 30303
404-954-5000
bcarver@hallboothsmith.com

Curt Thompson, Esq.
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100
Duluth, Georgia 30096
404-643-2649
curtbthompson@bellsouth.net

Dorothy E. Jaffe, Esq.
Sierra Club
50 F Street NW, 8th Floor
Washington, D.C. 20001
dori.jaffe@sierraclub.org

Zachary M Fabish, Esq.
Sierra Club
50 F Street NW, 8th Floor
Washington, D.C. 20001
zack.fabish@sierraclub.org

Heather Pohnan
Southern Alliance for Clean Energy
691 John Wesley Dobbs Ave NE
Suite C
Atlanta, Georgia 30312
heather@cleanenergy.org