SOUTHERN ENVIRONMENTAL LAW CENTER

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

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

July 1, 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. 44880

Dear Ms. Tanner,

Please find enclosed an electronic version of the following **Application for Leave to Intervene** to be filed in Docket No. 44880 on behalf of Georgia Interfaith Power & Light.

Respectfully submitted,

Aradhana Chandra
Associate Attorney
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
404-521-9900
achandra@selcga.org

Counsel for GIPL

STATE OF GEORGIA

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
	)	
Georgia Power Company's Application for Certification of Biomass Power Purchase Agreements	)	**Docket No. 44880**

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 May 16, 2024, the Commission issued a Procedural and Scheduling Order directing Georgia Power Company to file by June 4, 2024 its application, in accordance with the 2022 Integrated Resource Plan ("IRP") Final Order, requesting the Commission to: (1) grant a certificate of public convenience and necessity for the Biomass Power Purchase Agreements ("Biomass PPAs") from the 2023 Request for Proposals ("RFP"); and (2) approve an additional sum amount based on $3/kW-year.

2.

On June 4, 2024, the Commission issued an order suspending the original June 4, 2024 filing deadline. Neither the June 4, 2024 order nor the Commission's subsequent June 25, 2024 order suspending the original hearing date specify a filing deadline for Georgia Power Company's

Application for Certification of Biomass PPAs. As of this filing, Georgia Power Company has not yet filed its application, but the undersigned believe an application and new scheduling order will be forthcoming.

3.

This application for leave to intervene is timely filed in anticipation of Georgia Power Company's filing of its Application for Certification of Biomass PPAs.

4.

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.

5.

GIPL has an interest in Georgia Power Company's Application for Certification of Biomass PPAs, 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 likely be affected by the Commission's actions in this docket.

6.

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 Company's decision to invest in new biomass-generated energy when other renewable energy sources may be cheaper and more sustainable. GIPL intends to address the concerns of both itself and its members regarding how Georgia Power's application will 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.

7.

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 Application for Certification of Plant Yates Units 8-10 and its 2023 Integrated Resource Plan Update, Docket No. 55378; Georgia Power's 2022 Rate Case, Docket No. 44280; Georgia Power's 2022 Integrated Resource Plan 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 and its Application to Adjust Rates to Include Reasonable and Prudent Plant Vogtle Units 3 and 4 Costs, Docket No. 29849.

8.

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.

9.

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.

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:

Aradhana Chandra
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
achandra@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 1st day of July, 2024.

Aradhana Chandra
Jennifer Whitfield
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
P: (404) 521-9900
F: (404) 521-9909
achandra@selcga.org
jwhitfield@selcga.org

Counsel for GIPL

CERTIFICATE OF SERVICE

I certify that the foregoing **Application of Georgia Interfaith Power & Light for Leave to Intervene** in Docket No. 44880 was filed with the Public Service Commission by electronic delivery on the 1st of July, 2024 An electronic copy of same was served upon all parties listed below by electronic mail as follows:

Aradhana Chandra

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

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

Robert S. Highsmith Jr.
Holland & Knight
Regions Plaza
1180 West Peachtree Street NW, Suite 1800
Atlanta, Georgia 30309
robert.highsmith@hklaw.com

Allison Pryor
Troutman Pepper
Nations Bank Plaza
600 Peachtree Street, NE, Suite 3000
Atlanta, Georgia 30308
allison.pryor@troutman.com

Kelley Balkcom
Georgia Power Company
241 Ralph McGill Boulevard, NE
Atlanta, Georgia 30308
mmcclosk@southernco.com

VERIFICATION

STATE OF GEORGIA

COUNTY OF FULTON

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, **Aradhana Chandra**, who, after being duly sworn, deposes and says she 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 her information and belief.

This 1st day of July, 2024.

Aradhana Chandra

Sworn to and subscribed before me
this 1 day of July 2024.

Notary Public

TAMYA SULLIVAN
NOTARY PUBLIC
FULTON COUNTY, GA
MY COMMISSION EXPIRES
NOVEMBER
16
2027