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| **COMMISSIONERS:**  **JASON SHAW, Chairman**  **TIM G. ECHOLS, Vice-Chairman**  **FITZ JOHNSON**  **LAUREN “BUBBA” McDONALD TRICIA PRIDEMORE** | Logo  Description automatically generated | **REECE McALISTER**  **EXECUTIVE DIRECTOR**  **SALLIE TANNER EXECUTIVE SECRETARY** |
| Georgia Public Service Commission | | |
| **(404) 656-4501**  **(800) 282-5813** | **244 WASHINGTON STREET, SW ATLANTA, GEORGIA 30334-5701** | **FAX: (404) 656-2341**  **psc.ga.gov** |

September 6, 2024

**PUBLIC DISCLOSURE**

Jeremiah Haswell

Director, Regulatory Affairs

Georgia Power Company

Regulatory Affairs Bin 10230

241 Ralph McGill Blvd., N.E.

Atlanta, Georgia 30308-3374

**RE: Docket No. 55378 / Georgia Power Company's 2023 Integrated Resource Plan Update**

**Data Request from Commission Staff (STF-PIA-17)**

Dear Ms. Balkcom:

Enclosed herewith, please find Commission Staff Data Request **STF-PIA-17.** Georgia Power’s initial responses to this Data Request package are requested as soon as possible, but not later than **September 23, 2024.**

If you have any questions concerning this transmittal, please call me at 404-651-5958.

Sincerely,

Jamie Barber

EERE Director

EERE Unit

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**In the Matter of )**

**) Docket No. 55378**

**Georgia Power Company’s )**

**2023 Integrated Resource Plan Update )**

**)**

**PIA STAFF'S SEVENTEENTH SET OF DATA REQUESTS TO**

**GEORGIA POWER COMPANY**

Jeremiah Haswell

Director, Regulatory Affairs

Georgia Power Company

Regulatory Affairs Bin 10230

241 Ralph McGill Blvd., N.E.

Atlanta, Georgia 30308-3374

**COMES NOW** the Staff of the Georgia Public Service Commission (“Commission”) and, pursuant to the authority vested in it by the Commission pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, “data requests”), **to be answered under oath** by designated representatives or agents of Georgia Power Company. Staff requests that a complete set of the responses and supporting documents be filed with the Commission’s Executive Secretary in the manner set forth in Utility Rule 515-2-.04(4). Staff requests that an original and five (5) copies be filed with the Executive Secretary of the Commission. **Accompanied therewith shall be an electronic version of the filing, which shall be made on a 3 ½ inch diskette or a CD ROM containing an electronic version of its filing in Microsoft Word****® for text documents or Excel® for spreadsheets.** As contemplated by law, responses to these Data Requests are expected from Georgia Power Company on or before **September 23, 2024.**

## DEFINITIONS

As may be used in this document:

1. “The Company,” “Georgia Power” or “The Utility” means Georgia Power Company and its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of said Company.

1. The term “you” and “your” refer to “the Company.”
2. The term “person” means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
3. The term “document” or “documentation” shall have the broadest possible meaning under applicable law. “Document” or “documentation” means every writing or record of every type and description that is in the possession, custody or control of the Company including, but not limited to, correspondence, memoranda, e-mails, drafts, workpapers, summaries, stenographic or handwritten notes, studies, notices, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term “document” or “documentation” further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, chart projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.
4. The term “referring or relating to” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
5. “And” and “or” as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would not otherwise be brought within their scope.
6. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
7. “Identify” or “identifying” or “identification” when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.
8. “Identify” or “identifying” or “identification” when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:
   * 1. the type of document (e.g., letter, memorandum, etc.);
     2. the date of the document; the title or label of the document;
     3. the Bates number or other identifier used to number the document for use in litigation; the identity of the originator;
     4. the identity of each person to whom it was sent;
     5. the identity of each person to whom a copy or copies were sent;
     6. a summary of the contents of the document;
     7. the name and last known address of each person who presently has possession, custody or control of the document;
     8. if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.
9. “Identify”, “identifying” or identity” when used in reference to a communication should be read to include information regarding the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

## INSTRUCTIONS

* + - 1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
  1. the privilege asserted and its basis.
  2. the nature of the information withheld;
  3. the subject matter of the document, except to the extent that you claim it is privileged.
     + 1. **The answers provided should first restate the question asked and also provide the name of the Company employee(s) or agents responsible for compiling and providing the information contained in each answer.**
       2. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
       3. If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
       4. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.
       5. **If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:**

1. **the privilege asserted and its basis.**
2. **a log should be provided identifying starting and ending bates numbers.**
3. **the nature of the information withheld;**
4. **the subject matter of the document, except to the extent that you claim it is privileged.**
5. **a description of the document to which the privilege applies.**

**PUBLIC DISCLOSURE**

1. Please describe in detail the process used by Georgia Power to identify its proposed BESS projects in its Application. Identify all steps taken by the Company to screen and identify the sites selected, the alternative sites considered and evaluated, scoring criteria, etc. Please provide all analysis and documentation of the sites that were considered by the Company to select the BESS sites for its Application.
2. Please refer to the Application for Certification, pg. 2, stating: “The Hammond BESS project is a standalone BESS that allows the Company to leverage existing infrastructure from the retired coal-fired Plant Hammond facility, where transmission capacity has been identified to be available by winter of 2026/2027.”
   1. Is 57.5 MW the maximum size that could be interconnected at the site of the retired Hammond coal plant? If not, why did the Company decide on this specific capacity value?
   2. If the site could host a larger battery, what is the largest battery that could be interconnected at this location given existing infrastructure and without incurring significant network upgrades?
   3. Did the Company consider siting a larger battery at this location to take advantage of additional tax credits? If so, why did it decide not to pursue a larger project?
3. Regarding the selection of Burns and McDonnell for the McGrau Ford Phase I and II, and Robins projects and the selection of Crowder for the Moody and Hammond projects:
   1. Please explain the factors leading to the selection of two different vendors for these services.
   2. Provide all documentation, bid scoring sheets, or other materials supporting these selections.
4. Regarding the selection of Tesla as the vendor for the battery systems:
   1. Please identify the other bidders that participated in the vendor RFP and provide an explanation of the factors that lead to the selection of Tesla over other bidders.
   2. Provide all documentation, internal presentations, bid scoring sheets, or other materials supporting this selection.
5. Please explain the XXXX Fixed O&M value for the Robins project.
   1. What expenses are included in the “Maintenance Capital” items?
   2. Why do Robins and Moody have XXXXXXXXXXXXXXXXXXX XX and McGrau and Hammond XXXXXXXX?
   3. Why is the Hammond XXXXXXXXXXXXXXXXXXXXXXXXX?
6. Please refer to the BESS Certification overview presentation provided to Staff on August 26th. Please explain why the Company assumed XXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXX.
7. Please refer to the BESS Certification overview presentation provided to Staff on August 26th, slide 22, noting that the cost for McGrau Ford Phase 1 is XXX XXXX and the cost for Phase 2 is XXXXXXX.
   1. Please provide a narrative explanation of why the cost estimates are XXXXXXXXXXXX for the two phases.
   2. Provide a breakdown categorizing the costs for each phase, demonstrating all differences between the two phases.
8. Please refer to the BESS Certification overview presentation provided to Staff on August 26th, slides 16-17. Please explain why the proposed COD for XXXXXXXXXXXXXXXXXXXXXXX
9. Please refer to the Company’s response to Staff’s informal questions, provided on August 30, in which the Company stated that XXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX Please elaborate on this response. XXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
10. Regarding the ITC assumptions for each proposed BESS project:
    1. Has the Company required vendor guarantees that the projects will qualify for the assumed ITC levels?
    2. Please identify all risks to project qualification for the assumed ITC levels. Provide risks for each project, if different.
11. Please refer to TS Attachment A - 500 MW BESS Economic Analysis.xlsx, ‘Cost Inputs’ tab. Please provide workpapers detailing the elements of each cost category. For example, the Company’s response to information requests (provided on August 30) noted that XXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXX; please disaggregate the cost elements. Similarly, the response notes that Fixed O&M includes XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX; please disaggregate these cost elements.
12. Regarding the McGrau Ford Phase 2 project, can you confirm that the interconnection study was performed prior to Georgia Power’s FERC Order 2023 compliance date? Please provide the date of the interconnection study.
13. Regarding the interconnection of each project submitted for approval, were any alternative transmission technologies evaluated as required by FERC Order 2023, to determine if they could mitigate network upgrades? If so, please provide details and results of those studies, and specify the alternative technologies that were evaluated.
14. Please provide detailed descriptions of the interconnection facilities and costs necessary to interconnect McGrau Ford Phase 1 and Phase 2, including what facilities are required to be altered in order to facilitate the additional capacity of Phase 2.
15. In the transmission analysis, for reliability purposes, are McGrau Ford Phase 1 and Phase 2 considered a single contingency or separate contingencies?
16. Did the Company, or a consultant on its behalf, perform any analysis or investigation to determine if a different location for the McGrau Ford Phase 2 would provide more reliably without risking a single source loss of both Phase 1 and Phase 2? If so, please provide complete details and results of the analysis or investigation.
17. The interconnection costs shown for McGrau Ford Phase 1 and Phase 2 XXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX.
    1. Please explain the upgrade requirements for Phase 2 that necessitated XXXXXXXXXX.
    2. Is there a substation reconfiguration for McGrau Ford Phase 2 planned?
    3. What, if any, are the efficiencies gained by siting these projects at the same location?
18. Please provide all current interconnection study requests and completed interconnection study reports for each BESS project.
19. What will be done with the battery cells at end of life?

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**In the Matter of )**

**) Docket No. 55378**

**Georgia Power Company’s )**

**2023 Integrated Resource Plan Update )**

**)**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff’s Data Request STF-PIA-17** in the above-referenced docket was filed with the Commission's Executive Secretary, an electronic copy of same was served upon all parties and persons listed below via electronic mail, or unless otherwise indicated, as follows:

|  |  |  |
| --- | --- | --- |
| Sallie Tanner  Executive Secretary  Georgia Public Service Comm.  244 Washington Street, SW  Atlanta, GA 30334  stanner@psc.state.ga.us | Jeremiah Haswell  Director, Regulatory Affairs  Georgia Power Company  Bin 10230  241 Ralph McGill Boulevard, NE  Atlanta, GA 30308-3374  [JHASWELL@southernco.com](mailto:JHASWELL@southernco.com) | Brandon Marzo  Troutman Pepper Hamilton Sanders LLP  600 Peachtree Street NE, Suite 3000  Atlanta, GA 30308-2216  [brandon.marzo@troutmansanders.com](mailto:brandon.marzo@troutmansanders.com) |
| Preston Thomas, Staff Attorney  Georgia Public Service Commission  244 Washington Street, SW  Atlanta, GA 30334  pthomas@psc.state.ga.us | Mr. G. L. Bowen, III  Charles B. Jones, III  Georgia Association of Manufacturers  The Hurt Building  50 Hurt Plaza, Suite 985  Atlanta, Georgia 30303  [rbowen@gamfg.org](mailto:rbowen@gamfg.org)  [cjones@gamfg.org](mailto:cjones@gamfg.org) | Jeffry C. Pollock  J. Pollock Incorporated  14323 South Outer 40 Road, Suite 206N  Town and Country, Missouri 63017-5734  [jcp@jpollockinc.com](mailto:jcp@jpollockinc.com) |
| Scott F. Dunbar  Partner, Keyes & Fox LLP  1580 Lincoln Street, Suite 1105  Denver, CO 80203  [sdunbar@keyesfox.com](mailto:sdunbar@keyesfox.com) | Alicia Zaloga  Assistant, Keyes & Fox LLP  1155 Kildaire Farm Road  Suite 202-203  Cary, NC 27511  [azaloga@keyesfox.com](mailto:azaloga@keyesfox.com) | Whit Cox  Southern Renewable Energy Association  337 Druid Oaks Northeast  Atlanta, GA 30329  [whit@southernrenewable.org](mailto:whit@southernrenewable.org) |
| Jennifer Whitfield  Bob Sherrier  Southern Environmental Law Center  Ten 10th Street NW, Suite 1050  Atlanta, GA 30309  [jwhitfield@selcga.org](mailto:jwhitfield@selcga.org)  [bsherrier@selcga.org](mailto:bsherrier@selcga.org) | Kimberly (“Kasey”) A. Sturm  Weissman PC  One Alliance Center, Fourth Floor  3500 Lenox Road  Atlanta, GA 30326  [kaseys@wessman.law](mailto:kaseys@wessman.law) | Peter J. Andrews  Metropolitan Atlanta Rapid Transit Authority  2424 Piedmont Road, NE  Atlanta, GA 30324  [pandrewa@itsmarta.com](mailto:pandrewa@itsmarta.com) |
| Curt Thompson, Esq.  Thompson & Associates Law Firm, PC  3775 Venture Drive, D100  Duluth, GA 30096  [curtbthompson@bellsouth.net](mailto:curtbthompson@bellsouth.net) | Isabella Aria, Esq.  Sierra Club  50 F Street NW, 8th Floor  Washington, DC 20001  [Isabella.ariza@sierraclub.org](mailto:Isabella.ariza@sierraclub.org) | Dorothy E. Jaffe, Esq.  Sierra Club  50 F Street, 8th Floor  Washington, D.C. 20001  [dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org) |
| Zachary M. Fabish, Esq.  Sierra Club  50 F Street NW, 8th Floor  Washington, D.C. 20001  [zack.fabish@sierraclub.org](mailto:zack.fabish@sierraclub.org) | William Bradley Carver Sr. Esq.  Hall Booth Smith, P.C.  191 Peachtree Street, NE  Suite 2900  Atlanta, GA 30303  [bcarver@hallboothsmith.com](mailto:bcarver@hallboothsmith.com) | Simon Mahan  Southern Renewable Energy Association  11610 Pleasant Ridge Road  Suite 103 #176  Little Rock, AR 72223  [simon@southernwind.org](mailto:simon@southernwind.org) |
| Stephanie U. Eaton  Carrie H. Grundmann  Spilman Thomas & Battle, PLLC  110 Oakwood Drive, Suite 500  Winston-Salem, NC 27103  [seaton@spilmanlaw.com](mailto:seaton@spilmanlaw.com)  [cgrundmann@spilmanlaw.com](mailto:cgrundmann@spilmanlaw.com) | Steven W. Lee  Spilman Thomas & Battle, PLLC  1100 Bent Creek Blvd., Suite 101  Mechanicsburg, PA 17050  [slee@spilmanlaw.com](mailto:slee@spilmanlaw.com) | Liz Coyle  Georgia Watch  55 Marietta Street, Suite 903  Atlanta, GA 30303  [lcoyle@georgiawatch.org](mailto:lcoyle@georgiawatch.org) |
| Peter Hubbard  Georgia Center for Energy Solutions  55 Leslie Street, SE  Atlanta, GA 30317  [peter@georgia-ces.org](mailto:peter@georgia-ces.org) | Chandra Farley  City of Atlanta, Mayor’s Office of Sustainability & Resilience  55 Trinity Avenue  Atlanta, GA 30303  [cfarley@atlanta.gov](mailto:cfarley@atlanta.gov) | John R. Seydel  City of Atlanta, Mayor’s Office of Sustainability & Resilience  55 Trinty Avenue  Atlanta, GA 30303  [Jrseydel@atlantaga.gov](mailto:Jrseydel@atlantaga.gov) |
| Alicia Brown  City of Savannah, Office of Sustainability  801 E. Gwinnett Street  Savannah, GA 31401  [alicia.brown@savannahga.gov](mailto:alicia.brown@savannahga.gov) | David Nifong  City of Decatur, City Manager’s Office  2635 Talley Street  Decatur, GA 30030  [david.nifong@decaturga.com](mailto:david.nifong@decaturga.com) | Mike Wharton  Athens-Clarke County Unified Government, Sustainability Office  110 Bray Street  Athens, GA 30601  [Mike.Wharton@accgov.com](mailto:Mike.Wharton@accgov.com) |
| H. Gordon Kenna  DeKalb County Government, Department of Public Works  1300 Commerce Drive  Decatur, GA 30030  [hgkenna@dekalbcountyga.gov](mailto:hgkenna@dekalbcountyga.gov) | Kathy Reed  DeKalb County Government, Department of Planning & Sustainability  178 Sams Street  Decatur, GA 30030  [kdreed@dekalbcountyga.gov](mailto:kdreed@dekalbcountyga.gov) | John Joseph McNutt  Regulatory Law Counsel  U.S. Army Legal Services agency  Office of The Judge Advocate General  Environmental Lae Division  9275 Gunston Road, Suite 4300  Fort Belvoir, VA 22060-5546  [john.j.mcnutt.civ@army.mil](mailto:john.j.mcnutt.civ@army.mil) |
| Jim Clarkson  Resource Supply Management  135 Emerald Lake Road  Columbia, SC 29209  [jclarkson@rsmenergy.com](mailto:jclarkson@rsmenergy.com) | Robert B. Baker  Robert B. Baker  2480 Briarcliff Road, NE, Suite 6  Atlanta, GA 30329  [bobby@robertbbaker.com](mailto:bobby@robertbbaker.com) | Donald Moreland  Georgia Solar Energy Association  1199 Euclid Avenue  Atlanta, GA 30307  [don@solarcrowdsource.com](mailto:don@solarcrowdsource.com) |
| Kimberly Scott  Georgia WAND Education Fund Inc  250 Georgia Avenue, SE Suite 202  Atlanta, GA 30312  [kim@georgiawand.org](mailto:kim@georgiawand.org)  [info@georgiawand.org](mailto:info@georgiawand.org) | Newton M. Galloway  Terri M. Lyndall  Galloway & Lyndall, LLP  The Lewis Mills House  406 North Hill Street  Griffin, GA 30223  [ngalloway@gallyn-law.com](mailto:ngalloway@gallyn-law.com)  [tlyndall@gallyn-law.com](mailto:tlyndall@gallyn-law.com) | Kimberly B. Frank  K&L Gates LLP  1601 K Street, N.W.  Washington, DC 20006  [kimberly.frank@klgates.com](mailto:kimberly.frank@klgates.com) |
| Tyler Mauldin  Microsoft Corporation  200 17th Street, NW  Atlanta, GA 30363  [tylermauldin@microsoft.com](mailto:tylermauldin@microsoft.com) |  |  |

So certified, this 6th day of September 2024.

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Jamie Barber

EERE Director

EERE Unit