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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** |

October 4, 2024

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. 44160 / Georgia Power Company's 2022 Integrated Resource Plan**

**Data Request from Commission Staff (STF-BESS-6)**

Dear Mr. Haswell:

Enclosed herewith, please find Commission Staff Data Request **STF-BESS-6.** Georgia Power’s initial responses to this Data Request package are requested as soon as possible, but not later than **November 4, 2024.**

If you have any questions concerning this transmittal, please contact Rob Trokey at 404-656-4549.

Sincerely,

Rob Trokey

Director

Electric Unit

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**In Re: )**

**)**

**Georgia Power Company’s ) Docket No. 44160**

**2022 Integrated Resource Plan )**

**)**

**STAFF'S DATA REQUEST STF-BESS-6 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 **November 4, 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.

1. “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.**

1. Regarding the Mossy Branch Battery Project:
2. What is the status of engineering, procurement, and construction? Please explain all improvements and/or delays to the original EPC timeline.
3. What is the current estimated commercial operation date?
4. What was the CWIP balance as of September 30, 2024?
5. Please allocate CWIP balance between the battery facility, T&D investment to accommodate Mossy Branch, AFUDC, and ad valorem.
6. What is the expected final capital cost? Please provide an explanation if the final capital cost is higher than the initial estimate.
7. Regarding the McGrau Ford Phase I Battery Project:
8. What is the status of engineering, procurement, and construction?
9. What is the current expected commercial operation date?
10. What was the CWIP balance as of September 30, 2024?
11. What is the expected final capital cost?
12. When does the Company expect to file its first quarterly construction monitoring report?
13. Regarding the Form Energy Battery Project:
14. What is the status of the Form Energy Battery Project?
15. Regarding the Fort Stewart Battery Project:
16. What is the status of engineering, procurement, and construction?
17. When does the Company expect to file EPC and battery supply agreements?
18. What is the current expected commercial operation date?
19. What was the CWIP balance as of September 30, 2024?
20. Has the Company identified a specific project for the 2 MW Distribution-Interconnected BESS Project approved in the Commission Order dated 7/29/2019? If so:
    1. What is the status of engineering, procurement, and construction?
    2. What is the battery technology type?
    3. What is the duration (hours) at planned capacity?
    4. What is the interconnection voltage?
    5. What are the proposed use cases for the project?
    6. What is the current expected commercial operation date?
    7. What was the CWIP balance as of September 30, 2024?
    8. What is the expected final capital cost?
    9. Is this project eligible for any tax credits under the Inflation Reduction Act?
21. Regarding the Robins Air Force Base Battery Project:
22. What is the status of engineering, procurement, and construction?
23. What is the current expected commercial operation date?
24. What was the CWIP balance as of September 30, 2024?
25. What is the expected final capital cost?
26. Regarding the Moody Air Force Base Battery Project:
    1. What is the status of engineering, procurement, and construction?
    2. What is the current expected commercial operation date?
    3. What was the CWIP balance as of September 30, 2024?
    4. What is the expected final capital cost?
27. Regarding the Hammond BESS Project:
    1. What is the status of engineering, procurement, and construction?
    2. What is the current expected commercial operation date?
    3. What was the CWIP balance as of September 30, 2024?
    4. What is the expected final capital cost?
28. Regarding the McGrau Ford Phase II Project:
    1. What is the status of engineering, procurement, and construction?
    2. What is the current expected commercial operation date?
    3. What was the CWIP balance as of September 30, 2024?
    4. What is the expected final capital cost?

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**In the Matter of )**

**)**

**Georgia Power Company’s ) Docket No. 44160**

**2022 Integrated Resource Plan )**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff’s Data Request STF-BESS-6** 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  MMCCLOSK@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 | Jillian Kysor  Nicha Rakpanichmanee  Southern Environmental Law Center  Ten 10th Street, NW, Suite 1050  Atlanta, GA 30309  jkysor@selcga.org  [Rnicha@selcga.org](mailto:Rnicha@selcga.org) | Robert B. Baker  Robert B. Baker, P.C.  2480 Briarcliff Road, N.E.  Suite 6  Atlanta, GA 30329  [bobby@robertbbaker.com](mailto:bobby@robertbbaker.com) |
| Jim Clarkson  Resource Supply Management  135 Emerald Lake Rd  Columbia, SC 29209  803-312-3500  [jclarkson@rsmenergy.com](mailto:jclarkson@rsmenergy.com)  rsmenergy.com | Ben J. Stockton, PE, MBA  Executive Director  Concerned Ratepayers of Georgia  2305 Global Forum Blvd. Suite 912  Atlanta, GA 30340  encomanager13@gmail.com | Mr. Jeffry C. Pollock  J. Pollock Incorporated  12647 Olive Boulevard,  Suite 585  St. Louis, Missouri 63141  [jcp@jpollockinc.com](mailto:jcp@jpollockinc.com) |
| Katie Southworth  Southface Energy Institute  241 Pine Street, NE  Atlanta, GA 30308  [ksouthworth@southface.org](mailto:ksouthworth@southface.org) | 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) | Steven C. Prenovitz, MBA  Consultant  Concerned Ratepayers of Georgia  4295 Amberglade Ct  Norcross, GA 30092  [scprenovitz@gmail.com](mailto:scprenovitz@gmail.com) |
| Alan R. Jenkins  Jenkins at Law, LLC  2265 Roswell Road, Suite 100  Marietta, GA 30062  [aj@jenkinsatlaw.com](mailto:aj@jenkinsatlaw.com) |  |  |
|  |  |  |

So certified, this 4th day of October

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Rob Trokey

Director

Electric Unit