EXHIBIT "A"

STATE OF GEORGIA.

CLARKE COUNTY:

AFFIDAVIT OF NEVILLE A. ANDERSON

Personally appeared before me, the undersigned officer duly authorized to administer oaths, NEVILLE A. ANDERSON, who upon being duly sworn, deposes and states as follows:

1.

I reside at 1131 Tanglebrook Drive, Athens, Clarke County, Georgia 30606. I am over the age of eighteen (18) years and competent to testify to the matters contained herein. I am aware that this affidavit will be used in support of a MOTION TO STAY of the Public Service Commission's "Order denying RGP Bowman Solar, LLC's Request to Initiate a Procedural and Schedule Order to Determine the Reasonableness of Interconnection Costs" in Docket 4822, and I consent to its use therein and for any other purpose permitted by law.

2.

RGP Bowman Solar, LLC ("Bowman") was organized to develop a 76.53 MW solar photovoltaic ("PV") generation facility (the "QF Facility") with 9.72 MVA Battery Energy Storage System ("BESS") located on approximately 342 acres at 2375 Georgia Highway 172, Bowman, Elbert County, Georgia 30642 (the "Subject Property").

3.

I am the Managing Member of Bowman, a Georgia limited liability company maintaining its principal place of business at 1131 Tanglebrook Drive, Athens, Clarke County, Georgia 30606. I conduct and overview all facets of Bowman's business. I am responsible for the

planning and development of Bowman's QF Facility, and I have performed these tasks since its creation in 2021.

4.

I work regularly with Bowman's financial advisers, financiers and potential investors who assist with the financial requirements of Bowman's QF Facility. I regularly meet with them as development of Bowman's QF facility progresses. Bowman's financial advisers provide cost and revenue projections, estimate the fair market value of the QF Facility upon completion and estimate interconnection costs. economic analysis projected that Bowman's QF Facility will be economically viable and economically valuable to Bowman, Georgia Power Company ("Georgia Power" or the "Company") and its customers.

5.

The projection of the QF Facility's economic viability changed dramatically when the Company provided Bowman with its Phase II interconnection study. The Phase II study identified interconnection costs of $76,560,000 for the QF Facility. According to the Phase II study, interconnection of the QF Facility required Bowman to pay or post security to totally rebuild approximately thirty-five (35) miles of existing lines – 14 miles on Georgia Transmission Company's ("GTC") system and twenty-one (21) miles on Georgia Power's – that were already at or near capacity overload long before the QF Facility was ever proposed. Ultimately, the Company required Bowman to pay or post security to cover these interconnection costs in the Company's state-jurisdictional Qualifying Facilities Interconnection Agreement ("QFIA").[1] The payment or posted security for interconnection costs imposed by the QFIA would be tied up for six (6) years waiting for completion of the network upgrades. It was determined that the interconnection costs imposed on the QF Facility would likely prevent its development. I

[1] QFIA, Exhibit "A" Costs to be Funded by Generator (p. 29).

advised the Company of Bowman's objections to the Phase II Study findings in the various calls conducted with the Company.

6.

I viewed the interconnection costs as unreasonable, unnecessary and likely inflated in price. My opinion was based on analysis by Mr. John Kelley, whose role with Bowman's QF Facility was detailed in my previous affidavit. Bowman's financial advisors shared my view. Bowman decided to ask for Commission review of their reasonableness. I authorized our counsel to prepare and file our Petition which contested the interconnection costs imposed by the QFIA and raised legal issues regarding the legality of the interconnection process under Georgia law and policies of the Federal Energy Regulatory Commission. The Petition sought Commission review of all of these issues, starting with the request that the Commission issue a Procedural and Scheduling Order to set a schedule for conducting a hearing thereon.

7.

Once the Commission denied Bowman's request for a hearing, I had to make difficult business decisions regarding the QF Facility's future. The inability to challenge the interconnection costs presented a great challenge to developing the QF Facility. One option was to walk away, losing approximately $700,000.00 incurred by Bowman to date to develop the project, and an additional $600,000.00 of my personal funds. Failure to execute the QFIA and NTP would immediately void the QFIA, remove the QF Facility from the interconnection queue, cause the project to fail (or have to start completely over) and the immediate loss of all investment to date. I rejected that option.

8.

To preserve the possible development of the QF Project, counsel and financial advisors recommended a more reasonable option. The Order required Bowman to execute the QFIA and tender a Notice to Proceed ("NTP") promptly, with payment due ten (10) business days thereafter on December 26, 2024. Relying on the advice of counsel and my financial advisers, I executed the QFIA and tendered the NTP, and I continued working with my financial advisers to identify capital firms that might be willing join with Bowman to provide the payments and post security required in the QFIA on or before the deadline.

9.

One capital investment group expressed willingness to consider participating with Bowman, even considering options to meet the payment and security requirements of the QFIA. After multiple meetings in person, by phone and video, that group withdrew from participation with Bowman, advising me that it considered the interconnection costs unnecessary and unreasonable and refusing to tie up funds (even if held only for security) for six (6) years. Its analysis determined that the interconnection terms and conditions caused the QF Facility to be economically non-viable. It suggested that its participation with Bowman could continue if the network upgrades were completed within twenty-four (24) months. The Company advised Bowman that acceleration of the upgrades was not possible. Discussions with the capital investment group concluded during the week of December 16, 2024.

10.

While another capital investment firm has expressed interest in working with Bowman, they have significant questions regarding the interconnection requirements. Another capital investment firm notified Bowman of its interest. But, it raised significant questions regarding interconnection and how payments or posted security will be held.

11.

Bowman does not foresee identification of a capital investment partner willing to participate with Bowman to develop the QF Facility and make the payments and post security required in the QFIA by December 26, 2024. Bowman, alone, will be unable to pay the funds or post security required by the QFIA by the deadline on December 26, 2024. But for the terms and conditions required by the QFIA for interconnection of Bowman's QF facility, Bowman's project would be financeable and could reach commercial operation. Bowman would receive a reasonable return on its investment, while providing the Company with needed, low-cost, carbon-free energy. The demise of Bowman's QF Facility is a loss to all parties, including the Company's ratepayers. On behalf of Bowman, I reassert its request that the Commission conduct a hearing to determine the reasonableness of the interconnection costs assessed by the Company on Bowman's QF Facility, as set forth in Bowman's petition.

12.

In the event the Commission does not issue a stay of the effective date of its Order, Bowman's QFIA will be voided, the QF facility will be removed from the interconnection queue, the project will fail and all investment of money, time and energy will be lost.

Further, Affiant saith not.

NEVILLE A. ANDERSON

Sworn to and subscribed before me
this 26th day of December, 2024.

_____, Notary Public

My Commission expires: JAN. 19, 2027

NICHOLAS McCLOSKEY NOTARY PUBLIC OCONEE COUNTY, GA Comm. Exp GEORGIA Jan. 19, 2027