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January 8, 2025

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

Re: Proposed Revisions to Georgia Power Company's CARES 2023 Utility Scale RFP Pro Forma PPAs, Docket No. 45084

Dear Ms. Tanner:

Since Georgia Power Company ("Georgia Power" or the "Company") issued the Clean and Renewable Energy Subscription ("CARES") 2023 Utility Scale Request for Proposals ("CARES 2023 US RFP") in January 2024, market conditions have created and accelerated the need for additional generation resources and transmission infrastructure. This need is not unique to Georgia Power, but rather impacts all electric service providers in Georgia, including each of the Integrated Transmission System participants.

During the evaluation of competitive tier bids for the CARES 2023 US RFP, Georgia Power identified several long-lead time transmission projects required to provide firm transmission service to most of the proposed facilities by the expected commercial operation dates. To avoid eliminating potentially viable bids, the Company thoroughly investigated alternative solutions to preserve a majority of the competitive tier bids for further evaluation.

To bridge the gap between commercial operation of the proposed facilities and the completion of the network upgrades required for firm transmission service, the Company is proposing the concept of Short-Term Network Service into the CARES 2023 US RFP Pro Forma Power Purchase Agreements ("PPAs"). Short-Term Network Service is a non-firm transmission service, which has been used by other utilities, that will address the difference in construction timelines between proposed renewable facilities and long-lead time transmission projects needed to provide Firm Transmission Service. The Company expects that Short-Term Network Service will be required only during the first few years of these 25 or 30-year PPAs.

The Company has revised both the CARES 2023 US RFP Pro Forma PPAs to incorporate the concept of Short-Term Network Service. Included with this filing, Georgia Power has provided a redline copy of each PPA showing the changes from the previously approved version as well as a clean copy, as revised. Commission Staff and the Independent Evaluator are supportive of this approach.

As the Commission is aware, the output of the resources procured through the CARES 2023 US RFP is expected to supply the subscriptions of commercial and industrial customers participating in the CARES program as well as the energy needs of all retail customers following the completion of the program. To the extent the implementation of Short-Term Network Service causes an increase in costs under the PPAs, Georgia Power proposes to recover the estimated costs from projected subscribing customers through the CARES Program Charge.

Accordingly, Georgia Power requests the Commission approve the revised CARES 2023 US RFP Pro Forma PPAs as filed and the proposed cost recovery of any estimated increase in costs resulting from this change as a PPA cost recovered from subscribing customers through the applicable CARES Program Charge.

If you have any questions regarding this filing, please call me at 404-885-3779 or email me at allison.pryor@troutman.com

Best regards,

Allison W. Pryor