

January 10, 2025

## **VIA ELECTRONIC DELIVERY**

Ms. Sallie Tanner Executive Secretary Georgia Public Service Commission 244 Washington Street, SW Atlanta, Georgia 30334

Re: Motion for Commission Oversight of New Large Load Customer Contracts;

Docket No. 44280

Dear Ms. Tanner:

Please find enclosed an electronic version of the Motion for Commission Oversight of New Large Load Customer Contracts to be filed in Docket 44280 this 10<sup>th</sup> day of January, 2025.

Respectfully submitted,

Bob Sherrier

Staff Attorney

Southern Environmental Law Center Ten 10<sup>th</sup> Street NW, Suite 1050

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404-521-9900

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## BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
Georgia Power Company's 2022 Rate Case	)	Docket No. 44280

#### **January 10, 2025**

## MOTION FOR COMMISSION OVERSIGHT OF NEW LARGE LOAD CUSTOMER CONTRACTS

During the 2023 Integrated Resource Plan Update, Georgia Power testified in response to Commissioner concerns that "the current tariffs and rates that we have give us the tools we need to ensure that [new large loads] put downward pressure on rates." Georgia Power further assured this Commission that shareholders—not existing customers—will bear the risks of Georgia Power's miscalculations about load materializing. Its counsel explained:

From the very first hearing in this proceeding this Commission been very clear, that Georgia Power's request for capacity to serve this economic development load cannot increase rates for customers. Georgia Power understands and shares that principle. ... Georgia Power, not customers, takes the risk that the load does not show up and that the revenues are not as anticipated. There is no downside for customers there but there is upside.<sup>2</sup>

Georgia Power now recognizes that it does not, in fact, have the tools it needs, and troublingly, its request suggests that customers, not shareholders, may be the ones at risk of subsidizing new large load customers. In Georgia Power's words, it is now requesting revisions to

<sup>&</sup>lt;sup>1</sup> 2023 IRP Update, Dkt. 55378, T.464:11-13. Existing customers "will pay less." T.497:8.

<sup>&</sup>lt;sup>2</sup> S. Hewitson, Closing Argument (April 11, 2024), available at <a href="https://www.youtube.com/watch?v=FtqDdzTajdg">https://www.youtube.com/watch?v=FtqDdzTajdg</a>.

its rules of service for the "tools needed to protect other customers" and to "protect against instances where the load may not materialize as expected."<sup>3</sup>

The request for stronger contracting tools is undoubtedly a step in the right direction. At the same time, it raises critical questions such as: How many large load contracts have been signed without these "needed" tools to protect existing customers? How much billpayer money has already been committed by Georgia Power under the prior rules?

This filing presents an opportunity for the Public Service Commission to review customer choice contracting before Georgia Power exposes itself or existing customers to any more risk. Accordingly, the Southern Environmental Law Center (SELC) asks the Commission to approve the requested revisions, with one exception: SELC suggests the Commission reject the proposed change to General Rule A.1. SELC further moves the Commission to take two immediate steps to help mitigate risks presented by new large load customers:

- 1. Exercise oversight over individually negotiated rate terms for new large load customers before such terms are executed; and
- 2. Adopt a policy that Georgia Power's recruitment and service of large load customers under the Territorial Service Act shall not result in increased costs for existing customers.

We ask that these rulings last at least until such time as a full cost of service study and tariff review can be conducted to inform a Commission strategy—which may include a data center tariff, more rigorous contract reviews, or other protections—to ensure existing customers are not subsidizing Georgia Power's recruited new customers.

<sup>&</sup>lt;sup>3</sup> "Request for Approval of Revisions to Georgia Power Company's Rules and Regulations, Docket No. 44280" at 2 (Dec. 11, 2024).

## I. The Commission should review and approve new large load contracts and review existing large load contracts to determine whether cost shifts occur.

Georgia Power exercises significant power when it comes to large customer pricing that allows it to determine in secret how much risk its existing customers will face. Because the Territorial Service Act permits retail competition for large loads under the customer choice exception, Georgia Power can and does make personalized, competitive "offers" to a potential new customer to acquire the right to serve them retail electricity.<sup>4</sup>

The risk that a new large customer or revenue source could go to another utility creates an incentive for Georgia Power to make the lowest priced offer it can justify. But as explained below, the flipside of this incentive is to have other, already captive, customers subsidize the generation, transmission, and distribution costs required to supply the new customer. Given the "extraordinary ... or twenty-two times the historical average" growth in customer choice demand in recent years, extraordinary action should be taken by the Commission to conduct oversight of this process.<sup>5</sup>

#### a. The risk to existing customers is great without oversight.

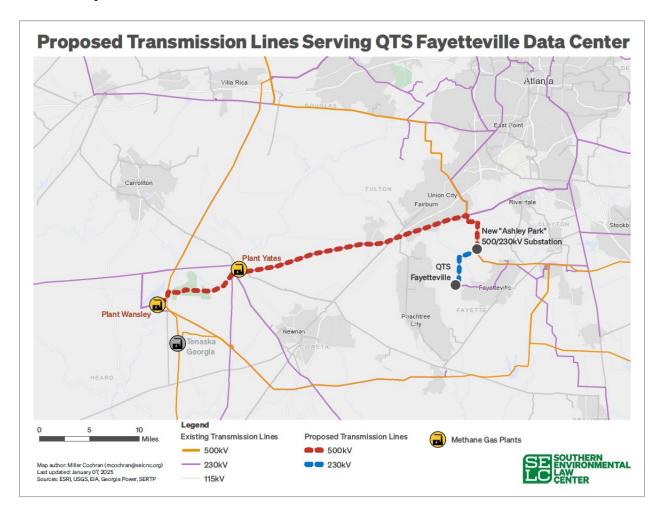
The magnitude of the costs implicated by today's proposed data centers warrants changes to the rules of service, as well as increased oversight by this Commission. The upfront investment required to serve these new large loads is extremely expensive – billions of dollars over the next few years from the 2023 IRP Update alone. The costs are surely growing; now at least 25 customers and 8,046 megawatts are "committed" to receive service from Georgia Power.<sup>6</sup>

<sup>&</sup>lt;sup>4</sup> Georgia Power runs a Rate Impact Measure (RIM) Test which informs the rates offered to each new large load customer. 2023 IRP at T.122:16-24. Georgia Power asserted many times during the 2023 IRP that it incorporates transmission and distribution costs into customer choice offers. *E.g.*, T.575:7-11; T.464:17-18 (Georgia Power evaluates the costs it expects to increase and "factor[s] that into the offers."). However, Georgia Power also stated that it excluded transmission costs from its "downward pressure" analysis. T.1985:3 (admitting its "not sure" what transmission costs will be).

<sup>&</sup>lt;sup>5</sup> 2023 IRP Update Main Doc. at 8.

<sup>&</sup>lt;sup>6</sup> Large Load Economic Development Report for Q3 2024 – Public Disclosure, Dkt. 55378 (Nov. 18, 2024).

One of those large load projects, the QTS Fayetteville data center provides a stark example of the cost. QTS Fayetteville will be a 6.6 million square-foot campus, and rough math puts its potential energy demand at approximately 1,320 MW. This is an enormous, around-the-clock load that requires new infrastructure.



There are at least two projects plainly caused by QTS Fayetteville. 8 One is a new, 35-mile, high voltage transmission line (in red, above) that connects gas-fired power plants to the other

<sup>&</sup>lt;sup>7</sup> Using a ratio of 0.2 megawatts per 1,000 square feet. *See* Dgtl Infra, "How Much Power Does a Data Center Require?" (Mar. 25, 2024), available <u>online</u>; *accord* Proximo, "QTS closes on hyperscale data centre construction facility" (Oct. 28, 2024), available online (reporting that just two buildings on the QTS Fayetteville campus would consume 340 MW).

<sup>&</sup>lt;sup>8</sup> Proposed Transmission Lines Serving OTS Fayetteville Data Center attached as Attachment 1, certain locations approximated based on publicly available information. See 2024 SERTP 4th Quarter Meeting – Presentation; see

project, a new substation with new transmission lines (in blue, above) connecting directly to the QTS site.

We estimate the cost of these projects is likely to exceed 300 million dollars. Georgia Power is unusual among its peers in that it refuses to publicly disclose the estimated total cost of its transmission projects, claiming it is a trade secret. However the following table offers a rough estimate, based on publicly available pricing information. However the following table offers arough

Transmission Project	<b>Estimated Cost</b>
New 500/230kV substation for 537MW customer	\$158,000,000
Exploratory cost estimate for 35 mile single-circuit 500kV line	\$143,500,000 – \$178,500,000
Rough estimate of QTS Project Costs	\$319,000,000

Georgia Power made QTS an offer **before** the 35-mile line was identified in public transmission planning documents. <sup>11</sup> What costs, if any, has QTS committed to pay for this infrastructure? How was that amount determined? How could the true extent of the costs have been known at the time the competitive offer was made? The current process is a black box.

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<sup>2023</sup> ITS Ten-Year Plan – Public Disclosure, Dkt. 44160, at 93 (Feb. 29, 2024) ("CC: QTS FAYETTEVILLE TRANSMISSION NEEDS"), excerpts of both documents attached as Attachment 2.

<sup>&</sup>lt;sup>9</sup> It is not clear what conditions are required for Georgia Power to publicly release cost estimates; in the IRP Update it revealed a \$60 million figure for Plant Yates transmission, calling it "miniscule." T.2246:7-8.

<sup>&</sup>lt;sup>10</sup> MISO South Technical Study Task Force, "MTEP24 Expedited Projects Review, Andes 500/230kV Substation Project" (Oct. 3, 2023); MISO, "Transmission Cost Estimation Guide for MTEP24" (May 1, 2024). The levelized net benefit of the entire 2023 IRP Update was \$168 million, excluding transmission costs. T.1978:4-21.

<sup>&</sup>lt;sup>11</sup> The 35-mile 500kV line first appeared in public documents on December 5, 2024, one week before the filing at issue here. 2024 SERTP 4<sup>th</sup> Quarter Meeting – Presentation; *compare* 2024 SERTP 2<sup>nd</sup> Quarter Meeting Presentation, both available online. Georgia Power had already started planning the other project, implying that QTS had previously signed a contract for service. *See* Sister Ward, Area Manager, Georgia Power Company to "Resident" (Aug. 21, 2024), Attachment 3.

# b. Customer Choice offers require additional oversight for these "unprecedented" large loads.

Customer choice loads receive special treatment in the Rules and Regulations for Electric Service that Georgia Power seeks to amend here. For example, in "instances deemed appropriate by the Company," Georgia Power performs a "profitability analysis ... to determine if a [monetary] contribution is required from the customer" to pay for distribution costs. <sup>12</sup> Similarly, for transmission line extensions, Georgia Power may require a cash contribution from the customer if "in the judgment of the Company," the expected revenue from that customer "does not justify" the capital expenditure. <sup>13</sup> This individualized rate making process was approved when Georgia Power was averaging less than 100 MW a year in new customer choice loads, but it is inadequate for the scale of investments—and the related risks—occurring today. <sup>14</sup>

One thing we do know is that under current procedures Georgia Power makes all of its customers, including residential and small business customers, pay for new projects when Georgia Power determines that the transmission or distribution investment is "upstream" or would "provide system benefit to other customers in addition to the customer choice project."<sup>15</sup>

That is, Georgia Power needs to identify just one single other customer that "benefits" from the project to justify spreading those costs to all customers: "local costs are assigned directly to the customer choice project ... where the customer choice project receives sole benefit." <sup>16</sup> Again, having other customers subsidizing costs allows Georgia Power to make a more competitive offer to acquire the right to serve a new large customer.

<sup>&</sup>lt;sup>12</sup> Rule C.2.

<sup>&</sup>lt;sup>13</sup> Rule D.5.

<sup>&</sup>lt;sup>14</sup> Georgia Power averaged just 100 MW a year in new customer choice loads before 2021. 2023 IRP Update Main Doc. at 8.

<sup>&</sup>lt;sup>15</sup> Georgia Power Company, Response to Data Request DEA-2-9, Dkt. 55378 (Dec. 18, 2023), Attachment 4.

<sup>&</sup>lt;sup>16</sup> *Id.* (emphasis added).

Regarding the local/upstream distinction in the QTS Fayetteville example above, Georgia Power publicly describes these projects as benefiting the entire electric system, which suggests it has and will ask all customers to pay these costs, clearly caused by the data center campus' demand:

- Regarding the new substation with two new 230kV lines directly to the QTS site:
   "The data center project will require area system upgrades that will benefit the entire community through improved system reliability, resiliency, and efficiency."
- Regarding the 35-mile 500kV transmission line from the gas plants to the new substation: "This project addresses multiple thermal overloads that occur under contingency."<sup>18</sup>

There should be transparency around which costs, caused by a large data center, will be allocated to customers, at the time Georgia Power is deciding what price to offer that data center to cover the costs. Those decisions should further be reviewed by the Commission to ensure fairness to existing customers. <sup>19</sup> As it stands, almost any transmission project could be characterized as providing a "system benefit" and thus charged to all customers. <sup>20</sup> Such an outcome is unjust and unreasonable for the massive infrastructure expansions planned to support data centers recruited to the state, and the inequity will only be compounded if the Commission has to fix this issue in class-wide rates, rather than on a cost-causer contract-by-contract basis.

SELC asks the Commission to both (1) exercise oversight over individually negotiated rate terms for new large load customers before such terms are executed to ensure on a case-by-case

<sup>&</sup>lt;sup>17</sup> Attachment 3.

<sup>&</sup>lt;sup>18</sup> 2024 SERTP Q4 Presentation, Project 19E, "Ashley Park – Wansley 500kV" (Dec. 2024).

<sup>&</sup>lt;sup>19</sup> See FERC Order No. 1000, regional transmission cost allocation principle #5: "the method for determining benefits and identifying beneficiaries must be transparent."

<sup>&</sup>lt;sup>20</sup> See generally "Transmission Planning Description & Process," 2022 IRP, Tech. App'x 3(A), Dkt. 44160, at 16; accord Direct Testimony of Lee Evans, Georgia Power Company, 2022 Rate Case, Dkt. 44280, at 5:17-27 (June 24, 2022) ("most parts of an electric system are planned, designed, constructed, operated, and maintained to jointly serve all customers."); 2023 IRP Update, Dkt. 55378, at T.575:1-4 ("transmission projects, if it is benefiting all customers, is paid for by all customers.").

basis that customer choice contracts are protective of existing customers and appropriately allocating costs and (2) adopt or reaffirm the policy position expressed by multiple commissioners, and counsel for Georgia Power, during the 2023 IRP Update that Georgia Power's recruitment and service of large load customers under the Territorial Service Act shall not result in increased costs for existing customers.<sup>21</sup>

# II. Georgia Power's request should be approved with edits and clarifications, as a stop gap until full consideration of appropriate data center rates in the 2025 Rate Case.

SELC supports revising Georgia Power's rules for electric service, with clarifications, as a stop-gap measure until a data center rate class can be evaluated with all necessary information. As proposed, the revisions are additional tools Georgia Power can invoke when in its sole discretion it "deems appropriate" to do so. The Commission should work on guidance as to how Georgia Power exercises this discretion.

We oppose the proposed change to General Rule A.1 because as written it would allow Georgia Power to add any condition it wants to any tariff. This language should be rejected or more narrowly tailored to specifically identified terms and conditions that are necessary to protect existing customers from the costs to provide service to new large loads, particularly data centers.

It is true that additional protections are needed here in the form of revisions to the rules of service, but it is also true that further action is required to ensure the distinctive class of customers – these new data centers – pays their fair share.

8

<sup>&</sup>lt;sup>21</sup> E.g., 2023 IRP Update, Dkt. 55378, at T.469:4-8 Vice-Chairman Echols: "My greatest concern is that your estimates are wrong or some of these people don't come. We secure all this power and your revenue falls short and we have to go to ratepayers and claim that." And T.159:12-15 Commissioner Pridemore: "I'm very concerned about customer rates related to this docket especially because what's being requested is a lot of increased infrastructure."

## **CONCLUSION**

For the foregoing reasons, we ask the Commission to adopt revisions to Georgia Power's rules of service and to take on active oversight of new large load contracts until a full analysis is conducted.

Respectfully submitted this 10<sup>th</sup> day of January, 2025.

**Bob Sherrier** 

Jennifer Whitfield

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# BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

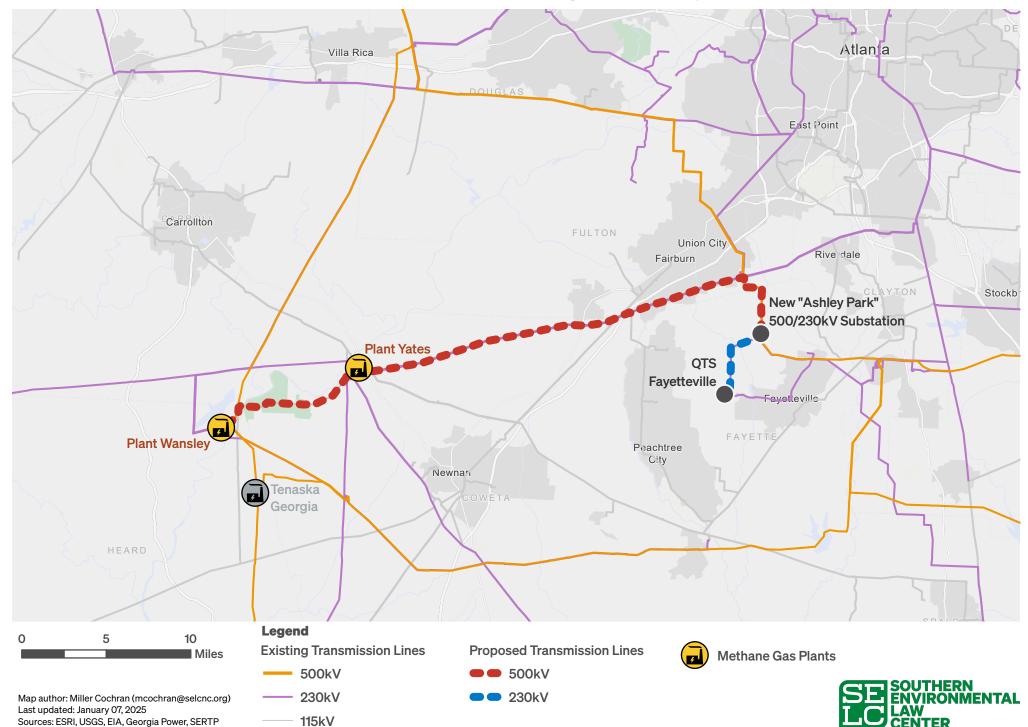
In Re:	)	
Georgia Power Company's 2022 Rate Case	)	Docket No. 44280

**January 10, 2025** 

# MOTION FOR COMMISSION OVERSIGHT OF NEW LARGE LOAD CUSTOMER CONTRACTS

## **ATTACHMENT 1**

## **Proposed Transmission Lines Serving QTS Fayetteville Data Center**



# BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
Georgia Power Company's 2022 Rate Case	)	Docket No. 44280

**January 10, 2025** 

# MOTION FOR COMMISSION OVERSIGHT OF NEW LARGE LOAD CUSTOMER CONTRACTS

## **ATTACHMENT 2**

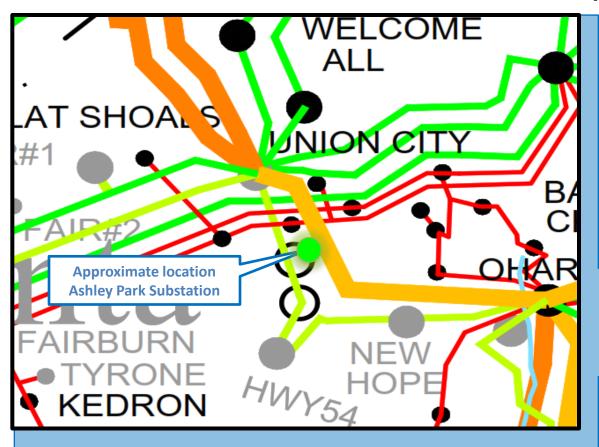


# **SOUTHERN Balancing Authority Area**

## **SOUTHERN - 7E**

2026

## **ASHLEY PARK 500/230KV SUBSTATION**

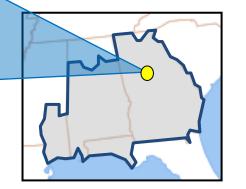


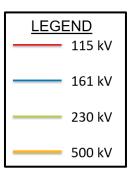
## **DESCRIPTION:**

- Construct a 500/230kV substation with two autotransformers.
- Build two new 230kV lines from the new 500/230kV station to serve customer load.

## **SUPPORTING STATEMENT:**

 The new 500/230kV substation and new 230kV lines are needed to reliably serve a new large load in the area.





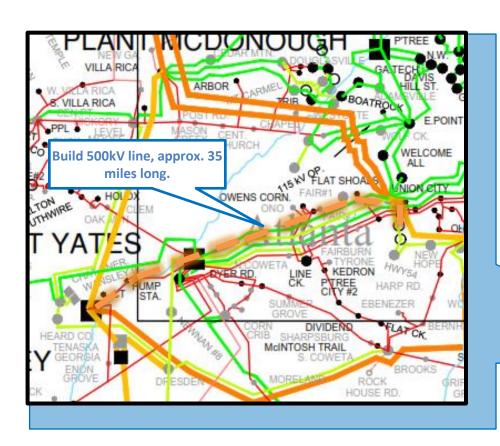


# SOUTHERN Balancing Authority Area

## **SOUTHERN – 19E**

2029

## **ASHLEY PARK – WANSLEY 500KV**

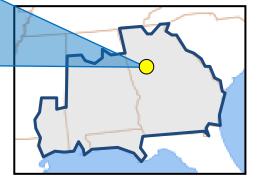


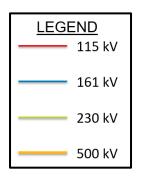
## **DESCRIPTION:**

 Construct a new 500kV line from Ashley Park to Wansley, approximately 35 miles long.

## **SUPPORTING STATEMENT:**

 This project addresses multiple thermal overloads that occur under contingency.





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#### **CC - QTS FAYETTEVILLE TRANSMISSION NEEDS**

#### Teams # 20018

Need Date 04/01/2026 Start Date 06/01/2023

## Description

Build a new 500/230kV substation (Ashley Park) splitting the Ohara - Union City 500kV line. Install two 500/230kV autotransformers at the Ashley Park station. At Ashley Park, the 500kV side will be a 4-breaker ring bus, while the 230kV side will be a 2-rung Breaker and a Half configuration. Build two new 230kV lines (~6 miles each) from Ashley Park to the high side of customer substations. The new lines will be built with bundled 200C 1351 ACSS Martin conductor.

# Supporting Statement REDACTED Change From Previous Ten Year Plan No Change Estimated Cost – GPC Estimated Cost – GTC Estimated Cost – MEAG Estimated Cost – MEAG Estimated Cost – DU REDACTED Estimated Cost – DU REDACTED Estimated Cost – ITS Assigned\* REDACTED

<sup>\*</sup> The ITS Assigned designation is for parity forecast purposes only

# BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
Georgia Power Company's 2022 Rate Case	)	Docket No. 44280

**January 10, 2025** 

# MOTION FOR COMMISSION OVERSIGHT OF NEW LARGE LOAD CUSTOMER CONTRACTS

## **ATTACHMENT 3**



BY U.S. MAIL

August 21, 2024

Re: Ashley Park 230kV Transmission Line Project

#### Dear Resident:

Georgia Power Company is pleased to host a community open house with Fayette County residents and business owners to discuss the construction of the new Ashley Park 230kV lines. These lines will support the new data center, which has catalyzed the need for additional transmission and distribution infrastructure to be installed in the area. The data center project will require area system upgrades that will benefit the entire community through improved system reliability, resiliency, and efficiency.

During the open house, our team will share information about the project and answer any questions you may have. It is our hope and expectation to provide clarity around project details such as the reasons for the upcoming construction, the type of equipment being used, and the timeline.

Please join us at the Fayette County Library located at 1821 Heritage Pkwy, Fayetteville, GA 30214 on Thursday, August 29, 2024, from 2-4 p.m. and 6-8 p.m. During the open house, attendees will be invited to visit several tables to learn more about specific topics and have one-on-one conversations with subject matter experts in areas such as project management, environmental affairs, land acquisition, substation design, and construction. This will be an informal gathering, and you are welcome to drop by anytime between the scheduled start and end times.

We encourage you to attend and participate in this community open house. If you have any questions, please contact me via email at <a href="mailto:sward@southernco.com">sward@southernco.com</a>. Otherwise, we look forward to seeing you there.

Sincerely,

Sister Ward Area Manager

# BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
Georgia Power Company's 2022 Rate Case	)	Docket No. 44280

**January 10, 2025** 

# MOTION FOR COMMISSION OVERSIGHT OF NEW LARGE LOAD CUSTOMER CONTRACTS

## **ATTACHMENT 4**

## Docket No. 55378 Georgia Power Company's 2023 Integrated Resource Plan Update STF-DEA Data Request Set Number 2

#### STF-DEA-2-9

#### **Question:**

Relative to Customer Choice loads, are any investments to serve such customers a cost charged to that customer or are other customers responsible for system improvements to serve a new customer choice customer?

## **Response:**

Investments to serve customer choice loads are assigned to each project and included in the customer choice offer. There are two types of costs that may be included in customer choice offers: local and upstream. Local costs are assigned directly to the customer choice project and may include both transmission and distribution investments where the customer choice project receives sole benefit. Upstream costs are allocated to each customer choice project based upon that project's marginal use of the system over the life of the project. Upstream costs include investments that provide system benefit to other customers in addition to the customer choice project. The Company prepares each customer choice offer to fully recover both local and allocated upstream costs required to serve the customer choice load over the life of the project.

Contact: Lee Evans

#### **CERTIFICATE OF SERVICE**

I certify that the foregoing **Motion for Commission Oversight of New Large Load Customer Contracts** was filed in Docket No. 44280 with the Public Service Commission by electronic delivery on the 10<sup>th</sup> of January, 2025. An electronic copy of same was served upon all parties listed below by electronic mail as follows:

**Bob Sherrier** 

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