Troutman Pepper Locke LLP
Bank of America Plaza, 600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308

troutman.com

troutman pepper locke

Allison W. Pryor
allison.pryor@troutman.com

January 28, 2025

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

Re: Georgia Power Company's 2029-2031 All-Source Capacity Request for Proposals; Docket No. 55268

Dear Ms. Tanner:

On January 9, 2025, Georgia Power Company ("Georgia Power" or the "Company") filed a letter with the Georgia Public Service Commission ("Commission") requesting approval to request information about alternative Commercial Operation Dates ("COD") or Delivery Commencement Dates ("DCD") from active participants ("Participants") in the 2029-2031 All-Source Capacity Request for Proposals ("RFP") as part of the existing Submission Refresh process. With this request, the Company sought to explore, within the parameters of the existing All-Source RFP process, additional options to efficiently and economically meet customer capacity needs.

The Company originally requested that this matter be included on the January 16, 2025, Energy Committee Agenda for Commission consideration. However, after further discussion with Commission Staff, the Company and Staff agreed to allow for additional time to consider the Company's proposal to receive additional information regarding COD and DCD from bidders in the All-Source RFP. As such, the Submission Refresh process opened on January 14, 2025, as originally approved. The current Submission Refresh allows all participants the option to refresh the fixed cost components of their original submission(s) in the All-Source RFP. Participant responses are due January 28, 2025.

On January 21, 2025, Georgia Power met with Commission Staff and the Independent Evaluator to further discuss the Company's request for information on the feasibility of alternative CODs/DCDs within the current All-Source Capacity RFP. Since the Submission Refresh window is already underway, Georgia Power revises its initial request as follows:

1. Georgia Power seeks Commission approval to request information from active Participants on possible COD/DCD alternatives as part of a separate refresh for COD/DCDs ("COD/DCD Refresh").

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2. Georgia Power proposes to ask active Participants if they are willing and able to offer an alternate COD/DCD within the need years of the All-Source RFP: November 30, 2028 through November 30, 2030 (*i.e.*, Winter 2029 through 2031).

3. If a Participant proposes an alternate COD/DCD, the Participant would have the ability to adjust the fixed cost components of the Submission necessary to meet the alternate COD/DCD.

4. Participants would not be required to offer an alternate COD/DCD.

5. The on-going Submission Refresh process, as originally approved by the Commission, does not allow Participants to adjust CODs/DCDs. As such, during the COD/DCD Refresh, while a Participant would have the option to offer an alternate COD/DCD, each Participant must still commit to the original COD/DCD offered for its Submission (at the refreshed price, if applicable).

6. Each Participant who proposes an alternate COD/DCD must guarantee the alternate COD/DCD with the same level of firmness required for the Participant's original submission (e.g., agree to PPA delay liquidated damages if COD is delayed).

7. The All-Source RFP remains under active evaluation. Any proposed COD/DCD alternative would be subject to further RFP evaluations, including pricing, interconnection, and delivery timing. Georgia Power would evaluate each offered COD/DCD and advance the option that best suits the needs of customers.

8. If approved, Georgia Power will open the COD/DCD Refresh on February 4, 2025, with responses due February 25, 2025.

The Company requests expedited Commission consideration of this request, which was originally filed on January 9, 2025. If considered at the January 30, 2025 Energy Committee, the proposed COD/DCD Refresh would not affect the current Short List determination date of May 16, 2025. However, the Company would push back the Competitive Tier determination date from February 24, 2025 to March 14, 2025. Any further delay in consideration of this request will jeopardize the Company's ability to adhere to current Short List determination date. Any necessary changes to the schedule to implement the COD/DCD Refresh will be communicated to all interested parties via the IE Website.

While the Company continues to explore all resource options to meet customer needs, approving the COD/DCD Refresh as outlined above will provide the Company with additional market information regarding resource availability in the need years sought to be filled by this RFP.

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

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Sincerely,

Allison W. Pryor

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