KEYES&FOX LLP

Via Alternative Electronic Filing

February 12, 2025

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, 1st Floor
Atlanta, GA 30334

RE: Georgia Power Company's 2025 Integrated Resource Plan and Application for Certification, Decertification, and Amended Demand-Side Management Plan, Dockets 56002 and 56003

Dear Executive Secretary Tanner:

Please find attached the Petition to Intervene of Clean Energy Buyers Association. A certificate of service is enclosed.

Please contact me with any questions about this filing. Thank you,

Sincerely,

/s/ Scott F. Dunbar

Scott F. Dunbar
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Counsel to Clean Energy Buyers Association

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

In Re:	:	
	:	
GEORGIA POWER COMPANY'S 2025 INTEGRATED RESOURCE PLAN	:	**DOCKET NO. 56002**
	:	
AND	:	
	:	
GEORGIA POWER COMPANY'S 2025 APPLICATION FOR THE CERTIFICATION, DECERTFICATION, AND AMENDED DEMAND-SIDE MANAGEMENT PLAN	:	**DOCKET NO. 56003**

PETITION TO INTERVENE
OF CLEAN ENERGY BUYERS ASSOCIATION

The Clean Energy Buyers Association (CEBA), by its undersigned attorneys Keyes & Fox LLP, pursuant to the provisions of O.C.G.A. §§ 50-13-14, 46-2-59, Commission Utility Rule 515-2-1-.06, and the Georgia Public Service Commission's (Commission) Procedural and Scheduling Order (PSO), hereby respectfully petitions the Commission for leave to intervene and participate in this docket as a party. In support of this petition, CEBA states as follows:

1. CEBA is a business trade association that activates a community of energy buyers and partners to advance low-cost, reliable, carbon emissions-free global electricity systems. CEBA's more than 400 members represent more than $20 trillion in market capital and include institutional energy customers of every type and size – corporate and industrial companies, universities, and cities, as well as project developers and service providers. CEBA's membership includes one-fifth of the Fortune 500 companies and some of the largest buyers of clean energy that conduct business operations across the United States and in Georgia, including customers of

Georgia Power Company (Georgia Power or the Company). CEBA's corporate and industrial members include companies across a variety of sectors including information technology, data centers, auto manufacturing, clean energy manufacturing, heavy industry, food and beverage manufacturers, financial institutions, restaurants, hotels, retail chains, and more. CEBA's members have ambitious clean energy commitments, and many of these members now consider, if not prioritize, their ability to access clean energy when determining where to locate new facilities and which existing facilities to expand.

2. In this proceeding, Georgia Power requests that the Commission approve its 2025 Integrated Resource Plan (IRP). Of particular interest to CEBA, Georgia Power requests that the Commission approve its request to extend the operating life of several coal-fired power plants, its proposal to modify its request for proposals (RFP) process to procure energy from new renewable energy resources to meet the needs of subscribing customers, its proposed changes to the Clean and Renewable Energy Subscription (CARES) program, and its transmission plan, among other requests.[1]

3. As a business association comprised of large energy customers, including many Georgia Power customers, the Commission's approval, denial, or modification of Georgia Power's proposals in its 2025 IRP will directly impact CEBA members' property and business interests.[2] Specifically, CEBA members often purchase clean energy directly when possible and work to ensure that their electricity supply is as clean as possible in states where options to purchase clean energy directly are more limited. In Georgia, CEBA members' ability to achieve their clean energy goals is largely tied to the emissions profile of their utility's resource mix and availability of customer clean energy programs offered by the utility. As a result, the ability of CEBA members

[1] 2025 IRP Main Document at 4-6.
[2] O.C.G.A. § 46-2-59(e)(2).

that are Georgia Power customers to achieve their clean energy goals is dependent on the Commission approving a resource mix for Georgia Power's 2025 IRP that is as clean as possible while ensuring least-cost principles, economic development goals, and reliable service requirements are achieved. CEBA members can only protect their business interests in purchasing electricity generated by clean energy resources through participation in this docket.

4. The cost of the resources Georgia Power procures as a result of the Commission's approval, denial, or modification of the 2025 IRP will be recovered through rates from Georgia Power's ratepayers. As ratepayers, CEBA members have property and business interests in ensuring that the resources Georgia Power procures to meet its capacity needs are cost-effective.

5. As a party to Georgia Power's 2023 IRP Update, CEBA signed a Letter Agreement with Georgia Power in which CEBA and Georgia Power agreed to meet to discuss the development of a carbon-free energy customer program. In the Letter Agreement, Georgia Power committed to propose this program in the 2025 IRP. Georgia Power has proposed certain modifications to the CARES program in the 2025 IRP, including a Customer Identified Resource option. CEBA has a vested interest in ensuring that the carbon-free energy customer program the Commission approves in this proceeding is consistent with Georgia Power's commitment to CEBA in the Letter Agreement and meets the needs of large clean energy customers, including CEBA members.

6. Further, CEBA has identified transmission planning and development as a major potential impediment to customers' ability to access reliable, clean energy to meet their clean energy commitment. Simply put, substantial, cost-effective transmission development will hasten economic development in the state from these businesses, while limited transmission will limit it. CEBA has an interest in ensuring that the transmission plan the Commission approves in the 2025

IRP will lead to timely, cost-effective investments in new transmission projects and upgrades in Georgia.

7. For these reasons, the outcome of this docket will directly impact CEBA's members, their property interests, and their business operations in Georgia.

8. CEBA respectfully states that no other entity can represent CEBA's interests in this proceeding. The nature of CEBA's interests and the manner in which the outcome of this proceeding will affect those interests are specific to CEBA's mission to advance low-cost, reliable, carbon emissions-free global electricity systems. Further, as a membership association of businesses focused on purchasing cost-competitive, reliable clean energy, the interests of CEBA and CEBA members are distinct from other large energy customers or customer groups that may seek to intervene in this docket. Given these unique interests, CEBA has not identified any other intervenors or prospective intervenors whose interests are similar to CEBA's interests. Because CEBA's interests arise directly from Georgia Power's proposals in this docket, granting CEBA's intervention will not unduly delay the proceedings or prejudice the rights of other parties.[3]

9. CEBA presently intends to submit direct testimony in this proceeding. Brent Alderfer, Board member of New Energy Economics, and Priya Barua, Senior Director of Market and Policy Innovation at CEBA, will sponsor direct testimony addressing Georgia Power's proposals that purport to implement Georgia Power's commitments in the Letter Agreement reached between CEBA and Georgia Power in the 2023 IRP Update, the implications of customers' clean energy commitments for Georgia Power's capacity need, and related issues. Additionally, Ted Thomas, Founding Partner of Energize Strategies, will sponsor direct testimony addressing Georgia Power's transmission plan, and related issues.

[3] O.C.G.A. § 46-2-59(e)(2).

10. All correspondence to CEBA should be addressed to:

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WHEREFORE, CEBA respectfully requests leave to intervene and to participate with full rights as a party in this proceeding.

Dated: February 12, 2025,

Respectfully submitted,

/s/ Scott F. Dunbar
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VERIFICATION

Personally appeared before me the undersigned officer, duly authorized to administer oaths, Scott F. Dunbar, who, after being duly sworn, deposes and states that he is an attorney authorized by Clean Energy Buyers Association to execute this Verification and that the information contained in the foregoing Petition to Intervene is true and correct to the best of his information and belief.

Scott F. Dunbar

State of Colorado
County of Boulder
The foregoing instrument was acknowledged before me on this 7th day of February 2025 by Scott F. Dunbar who is personally known to me or has produced CO Driver Licese as identification

Notary's Signature

MARIEL ALEJANDRA BAEZ ZAVALA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20214031824
MY COMMISSION EXPIRES 08/10/2025

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

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GEORGIA POWER COMPANY'S 2025 APPLICATION FOR THE CERTIFICATION, DECERTFICATION, AND AMENDED DEMAND-SIDE MANAGEMENT PLAN	:	**DOCKET NO. 56003**

CERTIFICATE OF SERVICE

I hereby certify that I have served the following parties with the foregoing via electronic mail as follows:

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Dated: February 12, 2025

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