THOMPSON
& ASSOCIATES
LAW FIRM, P.C.

Via Electronic Filing

February 13, 2025

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, 1st Floor
Atlanta, GA 20224

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 enclosed the Application of the Sierra Club, the Southern Alliance for Clean Energy, and the Natural Resources Defense Council for Leave to Intervene in Dockets 56002 and 56003. A certificate of service is also enclosed.

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

Curt Thompson
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BEFORE THE STATE OF GEORGIA
PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
GEORGIA POWER COMPANY'S 2025	)	
INTEGRATED RESOURCE PLAN	)	Docket No. 56002
	)	
and	)	
	)	
GEORGIA POWER COMPANY'S 2025	)	
APPLICATION FOR CERTIFICATION,	)	Docket No. 56003
DECERTIFICATION, AND AMENDED	)	
DEMAND-SIDE MANAGEMENT PLAN	)	

APPLICATION OF THE SIERRA CLUB, THE SOUTHERN ALLIANCE FOR CLEAN ENERGY, AND THE NATURAL RESOURCES DEFENSE COUNCIL FOR LEAVE TO INTERVENE

COME NOW, the Sierra Club, the Southern Alliance for Clean Energy ("SACE"), and the Natural Resources Defense Council ("NRDC"), pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Commission Rule 515-2-1-.06, and hereby file this Application for Leave to Intervene ("Application") before the Georgia Public Service Commission (the "Commission") in the above-referenced dockets. In support hereof, Sierra Club, SACE, and NRDC (hereinafter "Environmental Intervenors") respectfully show as follows:

1.

Sierra Club is the nation's oldest and largest grassroots environmental organization, with over 600,000 members across the country, including nearly 9,000 in Georgia. Sierra Club's mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's resources and ecosystems; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. As part of this mission, Sierra Club works on behalf of its members to help transition the power generation industry away from fossil fuels and towards a clean energy economy. Additionally, Sierra Club members purchase electricity from Georgia Power Company. Their consumption, costs, and terms of service for purchase of electricity may be affected by the Commission's actions in these dockets. As a result, Sierra Club has substantial

interests in the outcome of this proceeding and desires to intervene in order to protect those interests.[1]

SACE is a regional nonprofit with over 3,500 members in the State of Georgia. SACE also has an office and staff in Atlanta. SACE's purposes include education and research concerning the environment, public health, and economic impacts of energy use and policy in the Southeast. Additionally, both members and staff are ratepayers of Georgia Power Company. The Commission's actions in these proceedings will affect the planning and operation of Georgia Power Company's supply and distribution system, and directly impact the amount SACE members pay on their electric bills now and possibly for the next 60 years. Therefore, SACE has substantial interest in the outcome of the proceeding, and respectfully requests to participate.

NRDC is a nonprofit organization that represents more than three million members, including over 9,000 members in Georgia, across the globe. Its staff of lawyers, scientists, and other environmental experts work to confront the climate crisis, protect the planet's wildlife and wild places, and ensure the rights of all people to clean air, clean water, and healthy communities. In addition to its members in Georgia, NRDC partners with Atlanta organizations for inclusive, equitable, climate-wise, and healthy community development through training, technical assistance, and capital. The Commission's actions in this proceeding will affect NRDC's interest in decarbonization and the right to a healthy environment. Further, NRDC members and partner organizations are Georgia Power Company ratepayers. NRDC has a substantial interest in this proceeding and accordingly requests to intervene.

2.

On January 28, 2025, the Commission issued a procedural and scheduling order applicable to these dockets. Subsequently, on January 31, 2025, Georgia Power Company filed before the Commission for approval its 2025 Integrated Resource Plan ("IRP"). Pursuant to the procedural and scheduling order, Environmental Intervenors timely file this application for leave to intervene and participate in the above-referenced dockets.[2]

3.

Having reviewed other intervening parties' applications, Environmental Intervenors conclude that their rights and interests cannot be adequately represented by any other party to the above-styled dockets.[3] Environmental Intervenors are interested in the responsible transition away from fossil fuel-based electric generating plants towards meeting electricity demand with clean energy, and adequate energy planning for both economic interests and public health.

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[1] O.C.G.A § 46-2-59 (e)(2).
[2] *Id.* at (c).
[3] *Id.* at (e) (2).

Environmental Intervenors respectfully request that they be granted leave to intervene and participate fully as a party in these proceedings, including the right to present testimony and exhibits, cross examine witnesses, and file briefs. While Environmental Intervenors have not yet determined all of the witness testimony they would offer, the Environmental Intervenors anticipate providing expert testimony regarding fossil fuel plant decertification, energy costs, storage and dispatch, demand-side resources, environmental compliance, vehicle electrification, and transmission upgrades.

4.

Environmental Intervenors' participation in this matter will not unduly delay these proceedings or prejudice any other party.[4] Sierra Club previously applied for leave to intervene in the 2013, 2016, 2019, 2022, and 2023 Georgia Power Company IRP proceedings, and those applications were granted. SACE previously was granted party status as an intervenor in the 2010, 2013, 2016, 2019, 2022, 2023 Georgia Power Company IRP proceedings. Consequently, Environmental Intervenors have familiarity with the Commission's hearing procedures and applicable rules, ensuring efficient and orderly conduct in the proceeding.[5]

5.

Environmental Intervenors request that the following persons be included on the service list in these dockets and that all communications regarding these dockets be directed to them:

For Sierra Club:
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For SACE:
Maggie Shober

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[4] *Id.*; O.C.G.A § 50-13-14 (2).
[5] Commission Rule 515-2-1-.06 (3).

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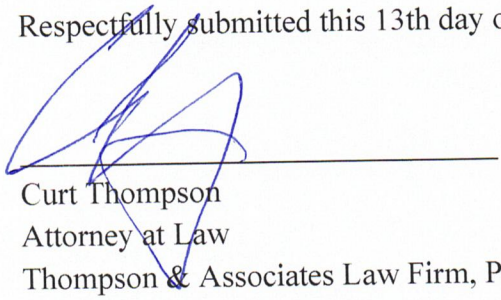
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Respectfully submitted this 13th day of February 2025.



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BEFORE THE STATE OF GEORGIA
PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
GEORGIA POWER COMPANY'S 2025 INTEGRATED RESOURCE PLAN	)	Docket No. 56002
	)	
and	)	
	)	
GEORGIA POWER COMPANY'S 2025 APPLICATION FOR CERTIFICATION, DECERTIFICATION, AND AMENDED DEMAND-SIDE MANAGEMENT PLAN	)	Docket No. 56003

VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly appointed to administer oaths in the State and County aforesaid, Zachary Fabish, who, after being duly sworn, deposes and says that he is a Senior Attorney for the Sierra Club and that the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of his information and belief.

This 12th day of February 2025.

Zachary Fabish

Zachary Fabish

Commonwealth of Virginia
County of Prince William County, VA

Sworn to and subscribed
before me this 12th day
of February 2025 by Zachary M Fabish.

Mark Christopher Hewitt

Notary Public 8049360
My Commission Expires: 02/28/2027

COMMONWEALTH OF VIRGINIA · N · ELECTRONIC NOTARY PUBLIC

Mark Christopher Hewitt
REGISTRATION NUMBER
8049360
COMMISSION EXPIRES
February 28, 2027

Notarized remotely online using communication technology via Proof.

BEFORE THE STATE OF GEORGIA
PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
GEORGIA POWER COMPANY'S 2025 INTEGRATED RESOURCE PLAN	)	Docket No. 56002
	)	
and	)	
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GEORGIA POWER COMPANY'S 2025 APPLICATION FOR CERTIFICATION, dECERTIFICATION, AND AMENDED DEMAND-SIDE MANAGEMENT PLAN	)	Docket No. 56003

VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly appointed to administer oaths in the State and County aforesaid, Maggie Shober, who, after being duly sworn, deposes and says that she is a Research Director for the Southern Alliance for Clean Energy, and that the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of her information and belief.

This 7 day of February 2025.

Maggie Shober

Sworn to and subscribed
before me this 7th day
of February 2025.

Jennifer L. Stachowski
Notary Public
My Commission Expires:
7-7-27

Jennifer L. Stachowski
State of Tennessee
Notary Public
Knox County

BEFORE THE STATE OF GEORGIA
PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
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	)	
and	)	
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GEORGIA POWER COMPANY'S 2025 APPLICATION FOR CERTIFICATION, DECERTIFICATION, AND AMENDED DEMAND-SIDE MANAGEMENT PLAN	)	Docket No. 56003

VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly appointed to administer oaths in the State and County aforesaid, Patrick King II, who, after being duly sworn, deposes and says that he is a Georgia Director for the Natural Resources Defense Council, and that the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of his information and belief.

This 12 day of February 2025.

Patrick King II

Patrick King II

State of Florida County of Okaloosa
Sworn to and subscribed
before me this 12th day
of February 2025. by Patrick King II.

Ozella Mae Moore

OZELLA MAE MOORE
Notary Public
My Commission Expires:
06/13/2027

OZELLA MAE MOORE
Notary Public - State of Florida
Commission # HH 391605
Expires on June 13, 2027

Notarized remotely online using communication technology via Proof.

Type of Identification Produced GA DL

BEFORE THE STATE OF GEORGIA
PUBLIC SERVICE COMMISSION

IN RE:	)	
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GEORGIA POWER COMPANY'S 2025	)	
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DECERTIFICATION, AND AMENDED	)	
DEMAND-SIDE MANAGEMENT PLAN	)	

CERTIFICATE OF SERVICE

I do hereby certify that I have this 13th day of February 2025, served the following parties with the foregoing **APPLICATION FOR LEAVE TO INTERVENE**, via hand delivery, email and or US mail as follows:

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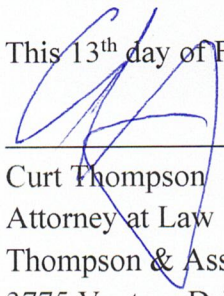
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This 13th day of February 2025.



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