BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

Georgia Power Company's 2025 Integrated Resource Plan	)	Docket No. 56002
and	)	
Georgia Power Company's 2025 Application for the Certification, Decertification, and Amended Demand-Side Management Plan	)	Docket No. 56003

Application of the Georgia Center for Energy Solutions for Leave to Intervene

The Georgia Center for Energy Solutions ("GCES"), pursuant to O.C.G.A § 46-2-59 and in particular O.C.G.A § 50-13-14 and Commission Rule 515-2-1-.06, hereby files for leave to intervene in the above-referenced docket. In support of this application, GCES respectfully and earnestly shows as follows:

1.

On January 28, 2025, the Georgia Public Service Commission (the "Commission" or "PSC") issued a procedural and scheduling order applicable to the above-referenced dockets. On January 31, 2025, Georgia Power Company (hereinafter "Georgia Power") filed with the Commission its 2025 Integrated Resource Plan ("IRP"). Pursuant to the Commission's Procedural and Scheduling Order, any person or party seeking an application for leave to intervene shall file the same within thirty (30) days following the first published notice of proceeding. In accordance with the Commission's Order, GCES hereby timely files this Application to Intervene and to participate in the above-referenced dockets.

2.

GCES is a 501(c)(3) nonprofit Georgia-based corporation formed to promote the development of an economic and regulatory framework to transition Georgia's electric sector, transportation sector, and other sectors in the state to a 100% clean energy (zero carbon) future in an equitable, reliable, resilient, sustainable, and economically efficient manner and in furtherance of the public benefit.

3.

GCES leadership includes a ratepayer served by GPC and GCES membership includes ratepayers served by GPC. GCES serves all citizens of Georgia and in particular advocates for the interests of the

2.4+ million residential GPC customers who will be affected by this 2025 IRP and who are not represented adequately in this proceeding. GCES advocates for clean energy policies and prudent regulatory decisions and by promoting an integrated resource planning process that accurately and transparently accounts for all costs and benefits. GCES seeks to intervene in this proceeding to analyze whether or not the 2025 IRP clearly demonstrates, as required by law in O.C.G.A. § 46-3A-2[1], that: "(1) The utility's forecast requirements are based on substantially accurate data and an adequate method of forecasting; (2) The plan identifies and takes into account any present and projected reductions in the demand for energy which may result from measures to improve energy efficiency in the industrial, commercial, residential, and energy-producing sectors of the state; and (3) The plan adequately demonstrates the economic, environmental, and other benefits to the state and to customers of the utility, associated with the following possible measures and sources of supply: (A) Improvements in energy efficiency; (B) Pooling of power; (C) Purchases of power from neighboring states; (D) Facilities which operate on alternative sources of energy; (E) Facilities that operate on the principle of cogeneration or hydro-generation; and (F) Other generation facilities and demand-side options."

4.

GCES also seeks to intervene in these proceedings to ensure rigorous integrated resource planning, analysis, and resource evaluation using proper assumptions and methodologies that result in a low-cost, low-risk, diversified, sustainable, resilient, and reliable portfolio of supply side and demand side-resources with minimal harmful environmental impacts. The founder, Peter Hubbard, is an experienced energy expert and regulatory expert witness who filed testimony before the Commission in 2019 (Docket no. 42310), in 2022 (Docket nos. 44160 and 44161), and in 2023 (Docket no. 55378). Mr. Hubbard has extensive industry experience in integrated resource planning, power market analysis, forecasting, portfolio risk analysis, scenarios, technology assessments, project development, origination, strategy, finance, permitting, real estate, regulation, microgrids, transmission, interconnection queues, beneficial electrification, distributed energy resources, transaction due diligence, natural gas market analysis, and more.

5.

[1] https://law.justia.com/codes/georgia/2010/title-46/chapter-3a/46-3a-2

GCES's interests are not adequately represented by other parties to this proceeding. GCES's intervention would not unduly delay the proceeding or prejudice the rights of other parties. If this application is granted, GCES intends to participate as a party in the docket. At this time, GCES intends to submit direct expert testimony in the docket to provide accountability, actionable recommendations, and oversight.

6.

GCES respectfully requests leave to intervene in this docket in order to propose several lower-cost and higher-reliability resource alternatives for the Commission to consider. Residential electricity rates for Georgia Power Company have risen at nearly twice the rate of inflation since 2010 and far faster than commercial or industrial electricity rates. Residential customers have seen their bills increase six (6) times in two years, due to a lack of consideration of alternative IRPs. GCES aims to remedy this lack of alternatives to Georgia Power Company's proposed 2025 IRP.

7.

GCES requests to receive all notices, correspondence, and copies of orders and other materials in this docket, and that all communications regarding this docket be directed to GCES at the following address:

Peter Hubbard
Georgia Center for Energy Solutions
55 Leslie St SE
Atlanta, GA 30317
Phone: (404) 226-4448
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WHEREFORE, GCES respectfully requests that the Georgia Public Service Commission grant its application and admit it as a full party of record in this proceeding with all rights attendant thereto.

Respectfully submitted this 4th day of March, 2025.

Peter Hubbard
Clean Energy Advocate
Georgia Center for Energy Solutions

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and	)	
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Verification of the Application for Leave to Intervene

Peter Hubbard personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County, and stated that he is representing the Georgia Center for Energy Solutions and that the facts contained in the foregoing application of Georgia Center for Energy Solutions, Inc. for Leave to Intervene are true and correct to the best of his information and belief.

This 4th day of March, 2025.

Peter Hubbard
Clean Energy Advocate
Georgia Center for Energy Solutions

Sworn to and subscribed before me

This 4th day of March, 2025

OSELOKA DAVID ADIBUAH

Notary Public

My Commission expires: 05-03-2026

OSELOKA DAVID ADIBUAH
NOTARY PUBLIC
My Commission Expires
05-03-2026
CLAYTON COUNTY, GEORGIA

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application of the Georgia Center for Energy Solutions for Leave to Intervene was filed in Docket Nos. 56002 and 56003 with the Georgia Public Service Commission's Executive Secretary by hand delivery. An electronic copy of same was served upon all parties listed below by electronic mail, unless otherwise indicated, and addressed as follows

DOCKET NOS. 56002 AND 56003: GEORGIA POWER COMPANY'S 2025 INTEGRATED RESOURCE PLAN

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This 4th day of March 2025

Peter Hubbard