BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	)	
GEORGIA POWER COMPANY'S	)	**Docket No. 56002**
2025 INTEGRATED RESOURCE PLAN	)	
	)	

APPLICATION FOR LEAVE TO INTERVENE OF

THE UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES

The United States Department of Defense and all other Federal Executive Agencies (DOD/FEA), hereby petitions the State of Georgia Public Service Commission (Commission) for leave to intervene in the above-captioned proceeding. DOD/FEA has a direct and significant interest in this proceeding. This application to Intervene is supported by O.C.G.A. §§50-13-14 and 46-2-59, Commission Rule 515-2-1-.06, and the Commission's January 28, 2025, Procedural and Scheduling Order. In support of this Motion, DOD/FEA states as follows:

I

DOD/FEA will be represented by, with all documents served upon and all communications referred to, its duly authorized representative pursuant to 40 U.S.C. § 501(c), United States Army Legal Services Agency employee:

John Joseph McNutt
Regulatory Law Counsel
U. S. Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road (JALS-ELD)
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II

DOD/FEA maintains numerous military installations and civilian agency activities within the State of Georgia, many of which obtain electric service from Georgia Power Company ("GPC"). Earlier this year, GPC filed a petition with the Commission for approval of its proposed Integrated Resource Plan. DOD/FEA has an interest in this proceeding, as certain GPC generation assets are located on or adjacent to DOD installations. DOD/FEA has a further interest in this proceeding as one of the largest customers on the GPC system. DOD/FEA has a further interest in this proceeding because the military has unique resiliency requirements and the IRP will determine, in part, the level of system resiliency that GPC will be expected to maintain in future years.

III

DOD/FEA purchases large quantities of electric service from GPC in Georgia. DOD/FEA installations served by GPC include, but are not limited to, Robins Air Force Base, Naval Submarine Base Kings Bay, Marine Corps Logistics Base Albany, Fort Stewart, Hunter Army Airfield, Fort Moore/Benning, and Fort Eisenhower.

IV

The interests of DOD/FEA are such that they cannot be adequately protected by any other party.

V

DOD/FEA's intervention and participation herein will not unreasonably broaden the issues, burden the record, unduly affect the rights of participating parties, or unreasonably delay the proceedings.

WHEREFORE, The United States Department of Defense and all other Federal Executive Agencies petitions the Commission for leave to intervene in the captioned proceeding. DOD/FEA further requests that the Commission provide an accommodation to DOD/FEA to: (1) allow a remote video appearance by counsel on March 25 for the purpose of appearing at the intervention hearing; (2) approve intervention without the need for an in-person appearance on March 25 to save the expense of having to fly counsel from Virginia to Atlanta; or (3) approve intervention even if no appearance is made if the federal government is in shutdown status and DOD/FEA counsel is prohibited from working on March 25.

Dated this 6th day of March, 2025.

Respectfully submitted,

John Jospeh McNutt
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BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: **GEORGIA POWER COMPANY'S** **2025 INTEGRATED RESOURCE PLAN**	**Docket No. 56002**

VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, John J. McNutt, who, after being duly sworn, deposes and says that he is the attorney for the United States Department of Defense and all other Federal Executive Agencies and the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of his information and belief. This 6th day or March, 2025

John J. McNutt

Sworn to and subscribed before me
this 6th day of March, 2025.

Notary

MICHELLE MARIE SHULER
NOTARY PUBLIC
COMMONWEALTH OF VIRGINIA
REGISTRATION # 7846347
MY COMM. EXPIRES 01/31/2028

City/County of Fairfax
Commonwealth of Virginia
Subscribed and sworn to before me
this 6 day of March, 2025
by
Notary Public
Reg. # 7846347 Com. Exp. 01/31/2028

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: **GEORGIA POWER COMPANY'S** **2025 INTEGRATED RESOURCE PLAN**	**Docket No. 56002**

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing ***Application for Leave to Intervene of the United States Department of Defense and all other Federal Executive Agencies*** was filed on 6 MAR 2025 in Docket No. 56002 with the Georgia Public Service Commission's Executive Secretary and electronically mailed to the following parties listed below:

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