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May 2, 2025

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-9052

Re: In the Matter of:
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)
Direct Testimony and Exhibits of Blake F. Richetta

Dear Ms. Tanner:

On behalf of Georgia Coalition of Local Governments, please accept the attached Direct Testimony and Exhibits of Blake F. Richetta for filing in the above referenced dockets.

A hard copy of this filing is also being provided by Federal Express in accordance with your instructions.

Thank you for your assistance with this filing. If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Benjamin L. Snowden

Benjamin L. Snowden

pbb

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

DIRECT TESTIMONY OF BLAKE F. RICHETTA
ON BEHALF OF
GEORGIA COALITION OF LOCAL GOVERNMENTS

May 2, 2025

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Blake Richetta. I am the Chairman and CEO of sonnen, Inc. - Americas. sonnen Inc. headquarters is located at 1578 Litton Dr, Stone Mountain, GA 30083. sonnen world headquarters is located at Am Riedbach 1, 87499 Wildpoldsried, Germany.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. I am testifying on behalf of the Georgia Coalition of Local Governments ("Coalition").

Q. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I began my career as a Sales Manager at Lutron Electronics, a leading manufacturer of energy-saving light, shade, and temperature controls. For the first eight years of my career, I was responsible for building the go-to-market strategy and business model for RadioRA, a lighting control system for residential applications. Over the next six years of my career, I assumed a National Sales Manager role focused on developing sales channels, installer programs, and training programs for a successor product, the RadioRA2.

After leaving Lutron in 2016, I joined Tesla as a North American Power Wall sales manager, where I worked for 9 months before becoming the Vice President of Sales for sonnen's US subsidiary. I was in this role for a short time before being promoted to Senior Vice President, then Chairman and CEO about two years later.

In my tenure at sonnen, I have become a recognized pioneer of the residential behind-the-meter energy storage based Virtual Power Plant ("VPP") business model in the United States, while bringing key learnings to the American VPP from the highly advanced VPP

tradition in the European Union. Under my leadership, sonnen co-developed the "2019 Utility Project of the Year" Soleil Lofts apartment community VPP in Herriman Utah (12.6 MWh) with the Wasatch Group and Rocky Mountain Power ("RMP"). Following Soleil, sonnen worked under the leadership of RMP to develop the national "Peak Load Management Association" award-winning Wattsmart residential and commercial Distributed Battery Grid Management System Virtual Power Plant, currently deployed throughout Utah and Southern Idaho. Wattsmart and Soleil Lofts provide the electric grid with >54MWh of residential and C&I stored energy reservoir – including sonnen and non-sonnen batteries, firmly dispatchable under the control of RMP, featuring a direct battery VPP software integration into RMP's grid management system as opposed to utilizing a Distributed Energy Resource Management System ("DERMS"), yielding a full stack of grid services on a daily basis.

Some of my most recent accomplishments include launching the CAISO wholesale market-based sonnenConnect California VPP, becoming a founding member of the Consumer Battery Energy Sharing or "CBES" VPP program with LUMA in Puerto Rico, as well as the San Diego Community Power ("SDCP") CCA based VPP in Southern California. In California, sonnenConnect presents a legitimate solution to California's NEM3, featuring the deployment of sonnen's patented Optimized TOU Algorithm for professional time-of-use bill optimization services, as well as activating four CAISO and non-CAISO based grid service levers.

I have also led the sonnen teams that were responsible for co-developing other notable solar + battery master planned communities alongside innovative home builders, including DOE

award-winning Mandalay Homes in Arizona, Residential LEED Platinum+ Pearl Homes in Florida, Living Community pioneer Thrive Collaborative in Michigan and most recently national award-winning Blatchford Lands in Alberta Canada, with Landmark Homes.

Finally, in the wake of Hurricane Maria, I led the sonnen organization alongside Pura Energia, while founding the 501(C)(3) del Sol Foundation for Energy Security, to build nine microgrids that provide lifesaving services for disadvantaged communities across the island of Puerto Rico.

I hold a bachelor's degree in business administration from Edinboro University of Pennsylvania, which is now known as "PennWest Einboro."

Q. PLEASE TELL US ABOUT YOUR ORGANIZATION.

A. sonnen Inc. USA is a nationally renowned VPP based energy storage and software company, based in Stone Mountain, Georgia. Our parent company is the sonnenGroup GmbH, which was founded in Wildpoldsried Bavaria Germany in 2010, after a 2-year innovation process which began in 2008. We are a global leader in VPP-based energy storage solutions, with more than 180,000 batteries installed worldwide and virtual power plants operating on three continents.

sonnen's value proposition and trajectory as a company are best understood in the context of Germany's ambitious and rapid clean energy transition, or "Energiewende." In April 2001, the German Bundestag passed the landmark Erneuerbare - Energien-Gasetz ("EEG"), providing a Feed-in-Tariff of effectively 200% of the retail price of electricity for injecting a kWh of solar energy into the grid from a rooftop solar array. Wind incentives were also established at a premium. This incentive structure led Germany, in a relatively

brief period, to boast one of the highest penetrations of solar and wind energy per capita in the world, but it also presented several significant, unsustainable grid management challenges. Ultimately, the rapid adoption of non-dispatchable renewable energy resources brought new costs and a myriad of new problems to the German energy system, inspiring the EEG to undergo revisions which substantially lowered grid feed in incentives to match market value, to incentive self-consumption, and to create new dynamic price signals that could enable a renewable future – if only renewable energy could be directed in a responsible and purposeful manner. This major shift led to the birth of the grid tied energy storage industry, which remains the largest in the world, and ultimately, the beginning of the battery based virtual power plant concept as a greater solution for harnessing renewable energy and harmonizing it with the needs of energy system in real time. The sonnen organization was founded at a time when these challenges, and their new storage solutions, were becoming obvious, yet remained largely a research project. sonnen was an early pioneer in the extraordinary commercialization of grid optimized storage solutions, and remains at the vanguard of the established battery VPP market in the EU today.

Therefore, our first battery, the sonnenBatterie 1, was a home battery system that was simply a means for one home to self-consume solar power. However, we soon realized that, in order to pursue our vision of a clean energy system for society, we had to provide value at the grid level, by organizing many sonnen batteries to function as a coordinated network. The objective was to direct stored energy in a thoughtful manner, to perform useful grid services, upgrading variable renewable energy resources from being intermittent generators, to firm dispatchable grid assets.

The sonnen VPP journey began with small, distribution scale operations in retail energy markets through our sonnenCommunity and sonnenFlat offerings, which maximized solar self- consumption on a community scale, but our ambitions soon grew to offering an even larger range of services.

In 2017, we began a pilot with the German transmission grid to provide grid services using digitally networked sonnenBatteries. This early sonnenVPP was used to balance out frequency fluctuations and stabilize the grid, proving that VPPs could provide the same services as centralized, physical power plants. By 2018, the sonnenVPP was approved as a participant in the national power market. Today, this original VPP has eclipsed 350 MWh and is on track to reach 1 GWh in the next few years, making it the largest residential VPP in Europe. Now, we have VPPs operating in five key countries, including Germany, Belgium, Italy, Australia and the United States. Moreover, we are actively working to expand our energy storage system manufacturing and VPP operations at US HQ in Stone Mountain Georgia, as well as our "Georgia grown" innovation footprint, to meet the growing demand driven by our VPP business here in the United States.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes. I testified in the proceedings on Georgia Power Company's 2023 Integrated Resource Plan Update in Docket No. 55378.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I have been asked by the Coalition to review Georgia Power Company's ("Georgia Power" or "The Company") proposed Residential and Commercial Solar Plus Storage pilot in the Company's 2025 Integrated Resource Plan ("IRP") and to offer recommendations for

modifications of these programs that will enhance their value to the Company's system and to its customers. The purpose of my testimony is to share some of the lessons I've learned and insights I have gained about the development and implementation of VPPs that may improve the outcome of these activities in Georgia.

Q. ARE YOU SUBMITTING EXHIBITS ALONG WITH YOUR TESTIMONY?

A. Yes, I am submitting a chart comparing VPP programs developed by sonnen as **EXHIBIT BFR-1** to my testimony.

II. SUMMARY OF FINDINGS AND CONCLUSIONS

Q. PLEASE SUMMARIZE THE RECOMMENDATIONS THAT YOU ARE MAKING FOR THE COMMISSION TO CONSIDER.

A. My recommendations are as follows:

1. Georgia Power should implement the following changes to the Company's proposed Residential and Commercial Solar Plus Storage Pilot:

   a. Remove the size limitations for both residential and small commercial customers and allow size limitations to be set on a case-by-case basis based on the specific home or building load, desired use cases, electrical system and electrical infrastructure limitations;

   b. Establish a short-term cumulative target of 50 MW with no cap between programs together with a long-term target of 100 MW and require Georgia Power to pursue an expedited process to request additional capacity;

   c. Provide all participating customers with assurances that GPC will not draw upon storage resources in advance of severe weather;

d. Allow grid charging of storage resources in both program options and stand-alone battery energy storage systems ("BESS") to participate in Company-Directed model;

e. Provide additional incentives for existing residential solar customers to "firm" existing solar on the grid by adding a dispatchable VPP battery to their home energy system; and

f. Provide an annual incentive in the Company-Directed option.

2. Georgia Power, in coordination with Commission Staff and other interested parties, should develop a full-scale VPP platform incorporating residential and commercial solar plus storage technology as well as managed charging, smart thermostats, and other available dispatchable load programs for Commission approval in or prior to the 2028 IRP. As part of this development process, the Company should hold at least three collaboration meetings with interested parties and incorporate their feedback into the filing.

III. VIRTUAL POWER PLANTS

Q. WHAT IS A VIRTUAL POWER PLANT?

A. The U.S. Department of Energy ("DOE") recently defined VPPs as "aggregations of DERs that can balance electrical loads and provide utility-scale and utility-scale grid services like a traditional power plant."[1] The fundamental components of a VPP are 1) behind-the-meter ("BTM") distributed energy resources ("DERs") and 2) software which enables behind-the-meter DERs to be controlled and networked with other similar devices to bring

[1] U.S. Dept of Energy, Pathways to Commercial Liftoff: Virtual Power Plants at 6 (Sept. 2023), https://liftoff.energy.gov/wp-content/uploads/2023/10/LIFTOFF_DOE_VVP_10062023_v4.pdf.

aggregated value to the larger energy system. Presently, these DERs fall into three broad categories: 1) renewable energy generators, predominantly rooftop solar; 2) battery energy storage systems; and 3) intelligent, digitalized loads, such as smart thermostats, electric vehicles and their charging equipment, and grid interactive water heaters, among others. Virtual power plants can provide a wide range of grid services, including capacity, energy, frequency response, demand response, and spinning and non-spinning reserves. Virtual power plants can also support load shifting or act as load sinks, absorbing excess renewable energy that would normally be curtailed.

Q. HOW DO VIRTUAL POWER PLANTS WORK?

A. For many utilities, customer-sited resources are largely unmanaged. Rooftop solar injects energy into the grid when it is produced, at roughly the same time that all other rooftop, community-scale, and utility-scale solar facilities are producing and injecting into the grid. Customers run their air conditioners or heat pumps whenever they want to, trusting that there will always be enough electricity to achieve and maintain their desired temperature. In some limited cases, such as cases of customers with EVs or customers with rooftop solar paired with storage, rate structures might encourage customers to charge at a certain time or to store their excess generation and consume it during system peaks, but these price signals are static and are not responsive to current conditions. These rate structures also do nothing to dynamically utilize a pool of energy resources, responding to real-time conditions within the energy system. As an example – let's imagine that harnessed solar and grid energy is immediately called on and dispatched across a thousand specific homes and a hundred specific buildings, in a purposeful manner, as a synchronous grid asset,

again, as part of the VPP, due to extreme congestion within a specific load pocket. This cluster of batteries is dispatched to shed each of their local home or building loads, in a matter of a few seconds, acting to decongest that specific sub-station load pocket where they are located, while simultaneously injecting a precise "set point" of energy into the grid, balanced and optimized by VPP node, offsetting the use of peaking power plants to deliver energy to thousands of other homes and buildings co-located in the same load pocket. And of course, this action not only reduces peaking power plant usage, it acts to further decongest the upstream energy system. Such a dynamic VPP dispatch may be based on an extraordinary grid side peak period, combined with extraordinary congestion in a specific load pocket. However, at a higher level, this example of VPP operation could be viewed as an argument for a non-wires-alternative to that specific load pocket, providing genuine infrastructure upgrade deferrals at the sub-station level and to its related distribution infrastructure.

In summary, VPPs take these unmanaged and largely uncontrolled generation systems, storage resources, and loads and orchestrate them to achieve grid harmonization and balance on a dynamic basis, in response to real time conditions. Resources are grouped into thoughtful, purposeful energy networks that can interact as a single firm dispatchable grid asset to provide specific grid services. All of this is made possible by powerful VPP software that can remotely monitor and control compatible technologies via a simple internet connection.

Q. WHAT GRID SERVICES CAN VIRTUAL POWER PLANTS PROVIDE?

A. VPPs can provide a wide array of grid services, including capacity, energy, frequency response, demand response, non-wires alternatives, renewable energy grid balancing (mitigate Duck-Curve-Effect), reverse demand response, grid scale resiliency, spinning reserves, and non-spinning reserves.

Q. HOW MUCH CAPACITY CAN VIRTUAL POWER PLANTS PROVIDE?

A. The beauty of virtual power plants is that they are highly scalable and modular. The maximum capacity of a virtual power plant is limited only by the technical, economic, and achievable potential of the distributed energy resources that it dispatches.

The U.S. Department of Energy has estimated the current VPP capacity in the United States is approximately 30 GW.[2] The Wattsmart VPP in Utah currently includes more than 28 MW of capacity, but the goal is to continue to scale from there to 100 MW and beyond in the 2030s.

Q. HOW QUICKLY COULD A VIRTUAL POWER PLANT BE DEPLOYED?

A. There are several off-the-shelf software products and control systems that can integrate with a utility's energy management system in a matter of months. For example, for the Wattsmart program, Rocky Mountain Power utilized 100% in-house sonnen VPP software, which RMP was able to integrate into their grid management system in less than six months. It took an additional 6 months to add an IEEE2030.5 server to allow our VPP software to control non-sonnen batteries. In other words, even if some degree of

[2]U.S. Dept of Energy, Pathways to Commercial Liftoff: Virtual Power Plants 2025 Update at 2 (Jan. 2025), https://liftoff.energy.gov/wp-content/uploads/2025/01/LIFTOFF_DOE_VirtualPowerPlants2025Update.pdf.

customization is needed, a full-scale, brand-agnostic program can be rolled out in roughly a year, and certainly less than two years. More so than the platform integration, the driving factors for the timeline are the regulatory process, which was very supportive in Utah, and the speed with which new resources can be installed, interconnected, and enrolled.

Q. WHERE ARE VIRTUAL POWER PLANTS BEING USED?

A. Virtual power plants are in use around the world, but they are particularly prevalent in Europe, Australia, North America, and Asia. In the United States, utilities and independent aggregators operate virtual power plants in Utah, Vermont, New York, Hawaii, California, Texas, North Carolina, Puerto Rico, the ISO New England market, and elsewhere. A recent report from the North Carolina Clean Energy Technology Center and Smart Electric Power Alliance identified over 100 policy actions relating to VPPs taken across 38 states and the District of Columbia in 2024.[3]

Q. WHERE HAS SONNEN DEPLOYED VIRTUAL POWER PLANTS?

A. sonnen's original VPP model has been scaled throughout Germany, with a second VPP in Belgium, a third in Italy, a fourth in Australia and a fast-growing VPP footprint now in America. Indeed, the sonnen VPP is the largest behind-the-meter residential storage based VPP in the European Union, featuring a deep, advanced grid services value stack, and years of experience in dispatch.

In America, sonnen's first VPP was developed in 2017 with home builder Mandalay Homes in Arizona, embedded throughout a few key master planned communities. This VPP was,

[3] N.C. Clean Technology Center & Smart Power Alliance, 50 States of Virtual Power Plants & Supporting Distributed Resources: 2024 State Policy Snapshot (Feb. 2025), https://nccleantech.ncsu.edu/wp-content/uploads/2025/02/2024-VPP-Report-Final.pdf.

in reality, a "VPP lite," as there was no dynamic dispatch signal from the utility or utility software integration. Still, the Mandalay project produced substantial innovation, and a special relationship with the utility around their bold TOU rate plan innovation, as the project led to sonnen's US patented Optimized TOU Algorithm, including offsetting residential Demand Charges (US Patent # 11,476,693 B2). The Mandalay battery network is also the first known community in America where reverse demand response "swarm grid charge" was deployed across an entire community with standardized VPP batteries, in coordinated fashion, responding precisely to the price signals embedded in a complex TOU rate. This project, which received the US Department of Energy Grand Award for Grid-Interactive Efficient Building Innovation in 2021, consists of homes equipped with rooftop solar, battery storage, energy efficiency, and advanced cloud-based control algorithms.

The next major VPP for sonnen was the Soleil Lofts project in Utah, with RMP and Wasatch Group, 2019 - 2021. Soleil Lofts represented a true breakthrough and set a new standard within the United States, for utility direct dispatched VPPs, with no DERMS in the middle, seeking to execute an entire stack of grid services – not limited to simple load shedding, dispatched daily. The Soleil Lofts community is a 4.6 MW/12.6 MWh VPP.

Off the heels of Soleil Lofts, RMP wished to scale this substantial achievement, which was already becoming an award winning and nationally recognized innovation, by launching a bold and unprecedented for America, truly service territory wide VPP platform, that could grow for years without set limitations – only contributing to more effective grid operations and cost savings as it scaled. RMP achieved this objective elegantly, and in a fraction of the time and money that many utility battery innovation programs were consuming, all

while deploying a deeper and more impactful grid services value stack. The customer facing name of the program – "The Wattsmart Battery Program." The name of the technology platform, "The Wattsmart Distributed Battery Grid Management System (DBGMS)."

In the Wattsmart VPP, the sonnen VPP software platform is utilized to control all sonnen and non-sonnen batteries, which are able to qualify under RMP's high standard for a dispatchable VPP grid asset. The sonnen VPP utilizes an IEEE2030.5 platform to control all non-sonnen batteries. Wattsmart quickly became the largest service territory wide VPP in American that was direct utility dispatched (no DERMS in the middle), that was performing advanced grid services like Frequency Response Regulation Up, amongst seven others, driven by a constant dispatch cycle (> 500 fleet dispatch calls in 2024 alone). By 2022, the Wattsmart battery program and VPP were winning awards and recognition nationwide and around the world, including but not limited to the 2023 Peak Load Management Association Award. Wattsmart even managed to grab headlines and influence projects in Europe and Australia. Presently, the Wattsmart VPP includes 28MW and 54MWh of firm dispatchable energy storage assets.

As Wattsmart scaled, sonnen launched its sonnenConnect California VPP in the CAISO wholesale energy market. The sonnenConnect California VPP currently dispatches 4 grid service programs within the CAISO market, while also deploying our Professional TOU Bill Optimization Service for our sonnenConnect customers. sonnenConnect California has grown to more than 10 MWh in size.

In 2024, sonnen became a proud founding member of Luma Energy's CBES Consumer Battery Energy Sharing VPP program in the Puerto Rico market and the San Diego Community Power VPP program, a new VPP model within the CCA ("Community Choice Aggregator") framework in California. Finally, in late 2024, sonnen partnered with solar battery energy financing company SOLRITE Energy and retail electric provider Abundance Energy to launch an entirely new model of VPP in the deregulated ERCOT Texas market.

Q. PLEASE DESCRIBE THE WATTSMART PROGRAM.

A. The Wattsmart Batteries program is a fully operational (i.e., non-pilot) distributed battery grid management program that sonnen launched in Utah with Rocky Mountain Power / Pacific Corp, a subsidiary of Berkshire Hathaway Energy, in 2021, with its precursor test project, Soleil Lofts, in 2019. Soleil Lofts is a 600-unit apartment complex that is home to a first-of-its-kind, utility-controlled VPP consisting of 4.5 MW of dispatchable capacity with a 12.6 MWh energy reservoir.

From the beginning, RMP dispatched this VPP on a daily basis, delivering genuine value to the grid. Since then, the Wattsmart Batteries program has opened to all customers in RMP's footprint across Utah and Idaho, where it offers a wide and growing range of grid services, including non-wires alternatives for local load pocket decongestion and T&D deferral, demand response, capacity planning, energy, frequency response, renewable energy grid balancing (to mitigate the "Duck-Curve" Effect), precise load shaping over the course of the day and night, reverse demand response for grid balancing (battery network utilized as a load sink during times of excess renewable generation in the grid or times of

low grid demand featuring excess generation and delivery potential), individual and system level resiliency, and spinning and non-spinning reserves.

Under this program, participants receive upfront and ongoing incentives for purchasing batteries that the utility can access to support the grid. The initial commitment is four years, with the opportunity to continue after that in exchange for a larger participation incentive.

Q. HAVE ANY OTHER UTILITIES IMPLEMENTED SIMILAR BATTERY STORAGE VPP PROGRAMS IN THE UNITED STATES?

A. Yes. Several utilities have implemented battery storage VPP programs, including:

- Luma Consumer Battery Energy Sharing (CBES)
- Duke Energy PowerPair Program
- National Grid ConnectedSolutions Battery Program
- Green Mountain Power BYOD Program
- Xcel Renewable Battery Connect

Q. WHAT ARE KEY FEATURES OF A SUCCESSFUL BATTERY STORAGE VPP PROGRAM?

A. Providing customers with a substantial upfront incentive paired with an annual incentive is critical to facilitate participation in these programs by offsetting the upfront cost of battery storage and any accompanying solar installations. Establishing longer-term agreements with customers can be an effective way to capture the value of the grid services provided by these systems over time and provide greater upfront incentives to participating customers. A utility should ensure that programs allow for configurations of solar and

storage resources that will still meet the customer's resiliency needs. Finally, a utility should engage in proactive outreach efforts to educate its customers about the program and corresponding benefits.

Q. WHAT TYPE OF GRID SERVICES CAN A BATTERY STORAGE VPP PROVIDE?

A. Depending on its configuration and program services, a battery storage VPP can provide several grid services, including:

- System-level demand response and peak shaving for system decongestion.
- Firm dispatchable capacity for system planning.
- Firm dispatchable energy to offset peaking power plant usage.
- Primary and secondary frequency response, providing either a dispatchable load sink or dispatchable generation, to rebalance system frequency up and down.
- Mitigation of the Duck Curve Effect, including preventing non dispatched solar grid injection, harnessing excess solar in the battery, and redirecting stored solar to offset peak periods, achieving a specific, ideal and high-value load shape.
- Individual home and building energy security, by way of backup power.
- System level resiliency, helping to prevent outages.
- Reverse demand response for grid balancing – using battery network as a load sink during times of excess renewable generation in the grid or times of low grid demand featuring excess generation and delivery potential.
- Non-wires alternative for local load pocket decongestion, infrastructure investment deferral.

- Voltage support.
- Spinning and non-spinning reserve capacity to provide emergency stabilization power.

Q. WHAT BENEFITS COULD RESULT FROM GEORGIA POWER'S DEPLOYMENT OF A VIRTUAL POWER PLANT?

A. The VPP is a mechanism to build behind-the-meter load and energy generation flexibility, critically located at the end of the distribution system, not on the bulk power system. This load shape and generation profile system flexibility, can lower costs for Georgia Power, increase grid resiliency, defer certain infrastructure investments, decrease the use of potentially high CO2 emitting peaking power plants, enable greater renewables penetration, all while empowering the continued rapid electrification of the energy system and associated load growth.

IV. RESIDENTIAL AND COMMERCIAL SOLAR PLUS STORAGE PILOT PROGRAM

Q. HOW DOES THE RESIDENTIAL AND COMMERCIAL SOLAR PLUS STORAGE PILOT PROGRAM PROPOSED BY GEORGIA POWER COMPARE TO OTHER SOLAR PLUS STORAGE VPP PROGRAMS THAT ARE COMMERCIALLY AVAILABLE?

A. The Company's proposed pilot is unique in that it proposes two different pathways for participation through the Customer-Directed option and the Company-Directed option. Under the Customer-Directed option, the participating customer would direct the use of the battery to respond to discrete utility-called events to receive incentive payments.

Customers would receive an annual enrollment incentive payment of $15/kW ($45/kW for Municipal University School and Hospital ("MUSH") customers) and receive payments based on the asset performance during called events of $1.50/kWh. Under the Company-Directed option, the Company would control the BESS and operate it based on system needs. Customers would receive a one-time upfront incentive of $750/kW for a 10-year commitment ($1000/kW for MUSH customers). **Exhibit BFR-1** contains a chart describing other battery storage VPPs where sonnen has deployed a substantial volume of systems.

Q. WHAT ARE YOUR GENERAL RECOMMENDATIONS FOR THE INCENTIVE STRUCTURE IN THE PILOT PROGRAM?

A. The Company should ensure that both the Customer-Directed and Company-Directed options feature a meaningful upfront incentive and a set payment to secure annual VPP dispatch rights. To accomplish this goal, the Company should increase the minimum term of the Customer-Directed option beyond one year and provide greater corresponding upfront incentives that align with the contract term. Customers need reasonable certainty about economic benefits and payback period to make a long-term investment in a system. Uncertainty about long term benefits will tend to discourage investment. The Company should provide additional incentives for existing residential solar customers to install battery storage. Customers participating in the Customer-Directed option should have the ability to receive additional compensation by opting in to provide additional, more advanced grid services, beyond the more fundamental daily cycle and event based demand response load shed, such as frequency response, energy (delivering a specific amount of

energy for a set period – both offsetting load and injecting into the grid), guaranteed capacity during specific peak periods, or potentially a non-wires-alternative opportunity for a specific load pocket, or non-spinning-reserves. Finally, the Company should provide an annual incentive payment in the Company-Directed option to incentivize future program participation.

Q. WHY SHOULD ADDITIONAL INCENTIVES BE OFFERED FOR EXISTING RESIDENTIAL SOLAR CUSTOMERS?

A. Retrofitting batteries to existing residential solar offers tangible benefits to the grid by converting a rooftop solar fleet from intermittent generation to a firm, dispatchable grid asset. Residential customers with existing solar are better positioned to participate in the program. While such battery retrofits can provide meaningful grid benefits, they require significant up-front investments from customers.

Q. HAVE ANY OTHER UTILITIES OFFERED LARGER INCENTIVES TO EXISTING RESIDENTIAL SOLAR CUSTOMERS IN VPP PROGRAMS?

A. Yes. As part of its Go Back Initiative, RMP offered larger incentives of $600 per kW to residential customers that currently have photovoltaic systems, as an upfront incentive, whereas a new solar + battery Wattsmart VPP node is offered a $400 per kW upfront inventive. Retrofitting existing residential solar under the Go Back initiative now account for a majority of new battery sales in the Wattsmart program. Working with Contractor ES

Solar, sonnen has already sold more than 18 MWh of retrofit energy storage systems through this initiative.[4]

Q. PLEASE EXPLAIN YOUR PROPOSAL TO ALLOW CUSTOMERS IN THE CUSTOMER-DIRECTED OPTION TO OPT IN TO PROVIDE ADDITIONAL GRID SERVICES.

A. Georgia Power may want to consider launching a very simple App for the Customer Directed program, providing a Dashboard of VPP Dispatch opportunities and an "Opt In" / "Opt Out." There are VPP-based companies that would be happy to co-develop such an App, while assisting in the management of such a program.

Q. WHY IS IT IMPORTANT TO OFFER AN ANNUAL INCENTIVE IN THE COMPANY-DIRECTED OPTION?

A. Providing an annual incentive in the Company-Directed option would help incentivize future program participation, particularly in the event of a transfer of ownership during the ten-year term of the agreement. The fundamental principle of a strong VPP program is to properly compensate customers for handing over control of their energy system to the utility, for the greater good of society's energy system and energy transition. This includes proper compensation for taking control of the customer's load shape and their rooftop solar array, all by way of a utility dispatchable solar + battery system. To that end, a VPP compensation program is generally most successful if it includes a set upfront incentive that is compelling, to help the customer "pull the trigger" on a major energy system

[4] Brian Martucci, *ES Solar, sonnen deploy 18 MWh of home battery retrofits through Rocky Mountain Power initiative,* Utility Dive (Sept. 10, 2024), https://www.utilitydive.com/news/es-solar-sonnen-deploy-18-mwh-of-home-battery-retrofits-through-rocky-mountain-power/726583/.

investment, with an annual dispatch rights incentive as a "foundational" payment for the ongoing VPP dispatch right of the utility.

Additionally, if Georgia Power is interested in pricing out additional incentives for the program, based on the system value of the more advanced and dynamic grid services, which may or may not be more intrusive to the customer's life, and making these incentives available in an opt-in format, then the customer is provided with a very popular and attractive "upside" incentive to maximize their performance within VPP for the utility, by way of a more full and dynamic value-stack. Such an opt-in program, for advanced grid services, also provides the customer with an interactive interface to Georgia Power, as a VPP member, increasing participation throughout their VPP journey with the utility.

Q. WHAT SIZE LIMITATIONS HAS THE COMPANY PROPOSED FOR THE SOLAR PLUS STORAGE PILOT?

A. The Company has proposed allowing systems to be sized up to 20 kW for residential applications and 250 kW or no more than 125% of metered load for commercial applications. The size limitation will be based on the maximum continuous output of the inverter. Depending on the configuration of a solar plus storage system, the total of both the solar and battery export capacity may be used to determine the maximum size limitations, particularly in AC coupled systems.

Q. HOW COULD THE COMPANY'S PROPOSED SIZE LIMITATIONS AFFECT PROGRAM PARTICIPATION?

A. The Company's proposed size limitations would preclude many customers from participating in the program, as an appropriate energy storage system design for these

particular homes and buildings, based on their desired use cases, even if designed entirely within the constraints of interconnection rules, code, and their electrical system infrastructure, would exceed the company's proposed limits. Furthermore, as discussed above, a VPP dispatchable battery is, by definition, solely dispatchable by the utility. Therefore, the solar generator and the battery on such a system would never inject maximum power, coincidently, into the grid unless ordered to, as a dispatch, by Georgia Power. And this would only be a problem if interconnection, code and electrical system limitations were violated first, and, if the VPP software configuration fail safes were violated by a Georgia Power dispatch. An energy storage system should not be viewed as a generator or as a load, it is, indeed, electrochemical storage, dispatchable to discharge stored energy or charge. Therefore, we do not believe that calculating the maximum size limitations based on the sum of the solar and battery export capacity is an optimal approach for the desired outcome of the VPP Pilot. We believe that such a rule set would certainly prevent customers from participating who require a certain legitimate system size for their application, which is within the boundaries of interconnection rules, code, and the natural limits of their particular electrical infrastructure.

Q. PLEASE EXPLAIN YOUR RECOMMENDATIONS WITH RESPECT TO THE MAXIMUM SYSTEM SIZE LIMITATIONS.

A. Respectfully, I do not fully understand the value of specific system size limitations associated with the VPP program. Appropriate system sizing and thus system sizing limitations should be based on the specific home or building load, desired use cases, and electrical system and electrical infrastructure limitations – both behind the meter and front-

of-the-meter serving the customer. Residential and commercial building codes, interconnection rules, and physical electrical system constraints automatically prevent oversized solar and battery installations. Therefore, a static limit, applied to all homes and buildings without consideration of each specific building's electrical system, does not make sense to me, as such a figure does not hold any value to a specific home or building's energy storage needs and natural electrical system limitations.

Finally, this type of VPP Node must be fully and solely dispatchable by the utility or grid operator, or the system will not be able to function as a VPP. This "whole is greater than the sum of its parts" principle is quite inherent to "VPP DNA," and not all customers may want to give the utility dispatch rights to their system. That said, for those who love the idea of receiving fair compensation for the value of giving up control of their load shape and energy system, the VPP "rules" make sense. In recognition of these principles, RMP does not impose a maximum size limitation on storage systems installed under its Wattsmart program.

Georgia Power will have complete and sole control over all VPP batteries, as to when they dispatch onto the grid and with how much power either to discharge or charge. Therefore, it is effectively impossible for the VPP battery to over-discharge, along with the PV array, injecting an excessive amount into the grid, unless such a dispatch was a request from Georgia Power in error – in which case, internal VPP software system safeguards should block the grid operator's mistake. And this VPP principle as well as its ultimate fail-safe mechanism, are only in addition to the other more "natural" sizing limitations imposed by the system design, permitting and interconnection process mentioned above.

Q. WHAT OTHER RECOMMENDATIONS DO YOU HAVE FOR THE SOLAR PLUS STORAGE PILOT?

A. The Company should allow grid charging of battery storage in the Company-Directed option. This would allow the Company, the Georgia energy system, and the customer to receive the full benefits of the VPP node. Without allowing grid charge, as a mechanism of grid balancing, the VPP grid services value stack can, on certain days, especially "cloudy and rainy days," become extremely limited. Enabling grid charge will also open up the "battery only" VPP application, which could further assist Georgia Power with shaping customer load and smoothing grid operation, without the customer having to invest in a solar array for new energy generation, once again, adding system level value.

Georgia Power should be commended for proposing not to discharge the battery below 20% state of charge in the Company-Directed option, which will help support customer resiliency. However, many customers purchase battery systems to provide backup power in the event of a weather-related outage. To give customers confidence that they will receive these resiliency benefits even where the Company is directing operation of the battery, the Company should agree to cease all battery VPP dispatch activity, including the daily cycle, 4-6 hours in advance of a major storm, as well as during the duration of a major storm, in both the Company-Directed and Customer-Directed options. Note this application is really only feasible if grid charge is allowed in the VPP Pilot.

Q. DO OTHER VPP PROGRAMS BY PEER UTILITIES ALLOW GRID CHARGING FOR STAND-ALONE STORAGE?

A. Yes. RMP's Wattsmart allows grid charge within the grid services value stack. This has been especially successful at Soleil Lofts, where grid charge has substantially contributed to offsetting peak periods, while also reserving energy reservoir for frequency response and other grid services during winter months when solar irradiation is low and solar production fails to charge the battery.

Q. HOW DO YOU RESPOND TO GEORGIA POWER'S CONCERNS THAT GRID CHARGING OF BATTERY RESOURCES IN THE COMPANY-DIRECTED OPTION MAY "FORC[E] THE PARTICIPATING CUSTOMERS TO PURCHASE MORE ELECTRICITY"?[5]

A. The Customer would be adequately compensated for the use of the battery for this purpose so long as incentive levels are appropriate. To participate in the program, the Customer must be enrolled in an appropriate TOU rate.[6] The Company would be incentivized to grid charge the battery during times of low demand that would correspond with the low-cost Off-Peak Period on the customer's TOU rate. This stored energy will be time shifted to offset load during expensive TOU Peak Periods later in the day. Therefore, the Customer will defer purchasing expensive Peak Period power on their TOU rate by time-shifting low-cost Off-Peak power through the battery, discharging against Peak Period. This will represent a savings for the customer. It is important to note that in this daily cycle, the

[5] GPC Direct Testimony Hearing Tr. at 1198:7-9.
[6] Direct Testimony of Dr. Ross Beppler, Carley Goff, A. Wilson Mallard, and Andy Phillips in Docket Nos. 56002 and 56003, at page 40, lines 9-18.

Customer would have purchased this electricity even without the VPP battery; they would simply purchase it with the VPP battery at a different, lower cost time which supports grid balancing. As such, the energy system will benefit from this load shaping through grid charge, redirecting stored energy to offset peak periods. The Customer will also benefit from this practice because the Customer receives VPP incentives from Georgia Power.

If a power outage occurs while grid charge energy is stored in the battery's energy reservoir, it contributes to a better equipped, more fully charged battery during the outage, providing the customer with increased energy resiliency, allowing the customer to enjoy the benefit of this energy by way of longer duration backup power or backup power potential. Note that it is common to run grid charge in the daily cycle, during cloudy days, simply as a matter of good grid service practice. Cloudy days are associated with inclement weather. It is a high probability that there will be a cloudy day just prior to a major storm.

sonnen's VPP has proven more effective than others, on many occasions, in this situation, as our battery fleet was already well charged from the grid prior to a storm hitting. In many cases, sonnen even adds additional grid charge, along with the utility's consent, getting the battery fleet easily to full charge before a hurricane hits. Solar charge may be inadequate or unpredictable as a backup power preparation charge method before a storm, as it is often the case that prior to a major storm, the sky is filled with full, dark clouds, limiting solar irradiation.

Q. IN OTHER COMPARABLE VPP PROGRAMS, DO UTILITIES MAINTAIN BOTH A MINIMUM STATE OF CHARGE AND DECLINE TO DISPATCH THE BATTERY IF SEVERE WEATHER CONDITIONS ARE EXPECTED?

A. Yes. In the Wattsmart Program, RMP maintains a minimum backup power reservation, especially reserved for "unpredictable outages." Furthermore, RMP does not dispatch customer batteries and therefore enables full capacity for customer use, if the utility expects severe weather that could cause significant outages. The same is true for planned outages for maintenance. This is very similar in the Luma VPP program in Puerto Rico and the San Diego Community Power VPP. Even in the CAISO based California VPP, sonnen follows the same principal, governed only by the sonnen VPP and the CAISO Aggregator.

Q. UNDER WHAT TYPES OF WEATHER CONDITIONS WOULD YOU RECOMMEND THAT THE COMPANY NOT DISCHARGE STORAGE RESOURCES?

A. Consistent with the approach taken by other utilities, the Company should not discharge storage resources if severe weather conditions are expected that are likely to cause outages, including severe wind and rain (hurricane for instance), severe flooding, or wildfires.

Q. DOES THE COMPANY NEED AN OPERATIONAL DERMS TO OPERATE THE PROPOSED PILOT PROGRAM?

A. No. A DERMS is not required to operate the proposed pilot program. Battery manufacturers, including sonnen, offer a distributed battery grid management system (DGBMS) that integrates into the utility's energy management system without any intermediate DERMS. In its Wattsmart Program, RMP successfully utilized sonnen's

DGBMS without having to invest in a DERMS. A battery storage VPP system is fully capable of managing all these grid services, directly for the utility, with great visibility to the performance of each electrochemical energy storage device, which a DERMS cannot provide. A battery VPP can be implemented in a fraction of the time than that of a DERMS, and for a fraction of the cost, and is far nimbler for battery specific grid service innovation.

Q. IS THE COMPANY'S PROPOSED CUMULATIVE TARGET OF 50 MW SUFFICIENT TO MEET DEMAND FOR THIS PROGRAM PRIOR TO THE 2028 IRP?

A. Based on our experience, a 50 MW target for one or both program options prior to 2028 is reasonable. However, the Company should remove the individual 25 MW cap on each option to allow customers greater flexibility to participate in the program without requiring the Company to seek and obtain Commission approval. It may be beneficial to set a "Stretch Target," like RMP has done, of 100 MW to demonstrate the Company's continued commitment to this program. The Commission should enable and empower Georgia Power to apply for an extended VPP Program, above the 50 MW target, perhaps to the 100 MW "Stretch Target," and this process should be expedited and clear, so that in the event that Georgia Power is pleased with the performance and value of the VPP, and would like to expand and learn more, they can quickly apply to do so and be approved.

Q. WHAT STEPS SHOULD THE COMPANY TAKE TO MAKE THE SOLAR PLUS STORAGE PILOT A PERMANENT PROGRAM?

A. As Georgia Power gains experience dispatching their Pilot VPP, I recommend that it seeks to constantly expand their dispatchable grid services value stack, compensating customers

appropriately for the value of these grid services. Georgia Power should conceptualize what the full value of a rich VPP platform could be for their grid – featuring a deep grid services value stack - and the various valuations and incentives associated with each grid service. This should be a natural evolution of the Solar Plus Storage Pilot program. On or before the 2028 IRP, Georgia Power should propose to the Commission a full-scale VPP platform, scalable to a meaningful amount of Georgia Power's peak load requirements. Such a program should include the "keystone" solar plus storage technology as its foundation, but should also incorporate managed charging, smart thermostat, and other dispatchable load programs – potentially including technologies like dispatchable demand-response based AC control and electric heat-pumps. As part of this development process, the Company should hold at least three collaboration meetings with interested parties and incorporate their feedback into the filing.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

sonnenVPP Program	Upfront Incentive	Yearly Incentive	Performance-Based	Comments
Wattsmart Utah (RMP)	$400/kW = $1,920 (new installs) $650/kW = $3,120 (retrofits)	Varies by size of system and dispatch; estimated $75–$450/year	Wattsmart deploys full value stack based on set incentives.	- Highly dynamic, constant dispatch, direct from utility, based on real-time grid conditions. - Dispatched every single day to shape and flex generation and load - Featuring a full stack of grid services. (8 total) - Dispatched > 500 times in 2024
San Diego Community Power (SDCP)	$350/kWh = $7,000 (for 20 kWh battery)	Up to $0.10/kWh per event (i.e., up to $10/day if full 20 kWh dispatched for 5 hours)	Yes – based on energy dispatched over up to 5 hours daily	Participating systems provide both daily peak period load offset as well as potential for injection.
sonnenConnect California (CAISO)	No fixed upfront incentive (but can stack with SGIP if eligible)	Estimated $200–$450/year from grid services + ~$250/year bill savings from sonnen's Professional TOU Bill Optimization Service	Yes – tied to performance in CAISO market and customer usage patterns	Wholesale market-based dynamic grid services
sonnenConnect Puerto Rico (LUMA)	No fixed upfront incentive	~ $200-$600/year from grid services	Yes – performance measured by response to LUMA grid service calls	Generally dispatched based on grid congestion.
German Wholesale Market based VPP	Varies, based on specific market based program.	Up to ~ €700/year from market-based dispatch revenues	Yes – Including price signals every 10 minutes, as well as dynamic grid services like Primary Frequency Response and other ancillary services embedded in market signals.	- Dynamic value stack model: energy arbitrage, grid congestion relief, and frequency regulation. - Dispatch is algorithmically optimized based on real-time wholesale market pricing and ancillary service markets.

Note: Examples use the sonnenCore+ (4.8 kW / 20 kWh) as the baseline system

CERTIFICATE OF SERVICE

I do hereby certify that I have this 2nd day of May, 2025, served the following parties with the foregoing Direct Testimony and Exhibit of Blake F. Richetta, on behalf of The Georgia Coalition of Local Governments, by electronic mail addressed as follows:

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This 2nd day of May, 2025

/s/ Benjamin L. Snowden
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