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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 David A. Nifong

Dear Ms. Tanner:

On behalf of Georgia Coalition of Local Governments, please accept the attached Direct Testimony and Exhibits of David A. Nifong 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 DAVID A. NIFONG

IN SUPPORT OF THE GEORGIA COALITION OF LOCAL GOVERNMENTS

May 2, 2025

I. INTRODUCTION

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

A. My name is David Nifong, and I am the Energy and Sustainability Manager for the City of Decatur. My business address is 509 N McDonough Street, Decatur, Georgia 30030.

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

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

Q. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I have worked with the City of Decatur for five years, becoming the City's first Energy and Sustainability Manager in July 2021. In my role, I advance the clean energy, climate action, resilience, and sustainability goals established by the Decatur City Commission and community in the 2020 Strategic Plan. Consistent with those goals, I led the development of the City's Clean Energy Plan, which established clean energy targets for City operations and the Decatur community. I hold a degree in Environmental Science from Emory University.

Q. PLEASE TELL US ABOUT THE COALITION.

A. The Coalition consists of five city and county governments that collectively represent approximately 2.1 million residents, or roughly 19% of the population of Georgia. The member governments are themselves large buyers of electricity, together purchasing significant quantities of energy for their local operations each year. The member governments' local operations include critical public functions such as emergency response, public safety, sanitation, and wastewater treatment. These operations rely on

reliable access to energy, making critical service delivery susceptible to impacts from extreme weather events and other disruptions to the electric system.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes. I testified in the proceedings on Georgia Power Company's ("Georgia Power's", or "the Company's") 2022 Rate Case in Docket No. 44280.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide recommendations to the Commission regarding modifications to Georgia Power's proposed Integrated Resource Plan ("IRP") and Application for the Certification, Decertification, and Amended Demand-Side Management Plan ("Application"), on behalf of the members of the Coalition and the Georgia Power ratepayers we represent. These measured recommendations can help increase access to Georgia Power's programs and support our communities' transitions to a clean energy future.

Q. ARE YOU SUBMITTING EXHIBITS TO YOUR TESTIMONY?

A. Yes, I am submitting the following exhibits along with my testimony:

1. **EXHIBIT DAN-1**: Curriculum Vitae of David A. Nifong
2. **EXHIBIT DAN-2**: Attachment to Company Response to STF-DEA-2-6

Q, IS THE COALITION SPONSORING OTHER TESTIMONY IN THIS DOCKET?

A. Yes. Blake F. Richetta has provided testimony on behalf of the Coalition regarding the Company's proposed Residential and Commercial Solar Plus Storage Pilot program.

II. SUMMARY OF RECOMMENDATIONS

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.

A. My recommendations are as follows:

1. Georgia Power should engage in proactive coordination and resilience planning to prepare for extreme weather events by:
    a. Working with stakeholders to establish a standardized process to make historic and annual outage data readily available to local governments for use in resilience planning; and
    b. Partnering with local governments to evaluate the potential costs, benefits, and feasibility of establishing resilience hubs and microgrids where they are critically needed; and
    c. Ensuring that its customer programs facilitate the development of resilience hubs and other projects that provide critical emergency response services and meaningful benefits to the grid; and
    d. Engaging with local governments and regional commissions on resilience planning to incorporate lessons learned in the aftermath of Hurricane Helene and other extreme weather events.
2. The Commission should require Georgia Power, prior to the 2028 IRP, to file a report assessing system vulnerabilities to extreme weather and strategies to build resilience on its system. Georgia Power should hold at least three collaboration meetings with interested parties and incorporate their feedback on the report.
3. The Company should incorporate the following changes to the Clean and

Renewable Energy Subscription ("CARES") utility and DG programs, and more specifically the Municipalities, Universities, Schools, and Hospitals ("MUSH") carveout, to make these programs more accessible to local governments:

a. Waive or defer the NOI fee for MUSH customers, regardless of whether they are participating in the program within the MUSH carveout or within another segment, such as the Existing Load segment;

b. Reduce or waive the 1 MW peak aggregate demand minimum for MUSH customers participating in these programs;

c. Expand procurement targets for subscription programs to maintain and establish carveouts for MUSH customers in both subscription programs;

d. Decline to impose a reimbursement threshold or otherwise cap bill credits for the CARES program.

4. To facilitate the installation of battery storage by MUSH customers for resilience purposes under the proposed Residential and Commercial Solar Plus Storage Pilot program, Georgia Power should, at a minimum, calculate any size limitations based solely on the maximum export capacity of the battery resources and increase the maximum size for commercial customers to at least 1 MW without regard to metered load.

5. The Commission should require Georgia Power, in coordination with Commission Staff and other interested parties, to develop a full-scale, integrated, multi-technology virtual power plant ("VPP") platform for Commission approval in or prior to the 2028 IRP.

6. The Commission should approve, with minor modifications, the Company's proposed DSM Portfolio ("Proposed Case") that achieves the DSM savings target of at least 0.75% of annual retail sales, as required by the Commission's Order Adopting Stipulation in the Vogtle Prudency Proceeding in Docket No. 29849 ("Vogtle Prudency Order"). The Commission should require the Company to make the following changes to its proposed DSM programs:

   a. Continue offering the Automated Benchmarking Tool ("ABT") as a DSM program;

   b. Continue and promote the Demand Side Management Working Group ("DSMWG") to allow for ongoing improvements and additions to Georgia Power's DSM portfolio;

   c. Adopt uniform income-level definitions and streamlined income verification procedures across both DSM and customer renewable energy programs; and

   d. Provide on-bill financing for MUSH customers to facilitate the adoption of energy efficiency measures.

III. RESILIENCE ASSESSMENT AND IMPROVEMENTS

Q. WHY IS THE COALITION CONCERNED ABOUT RESILIENCE IN THIS DOCKET?

A. Georgia Power's system and customers face increasing risks from extreme weather and a changing climate. Despite the heroic response efforts of the Company and its line workers in the aftermath of the storm, Hurricane Helene left more than 1.5 million Georgia Power

customers without power and resulted in extended outages for critical facilities, including hospitals and wastewater treatment facilities.[1] The Company has stated that Hurricane Helene "caused the most damage to our system of any storm in history."

Although its impacts were unexpected and unprecedented, Helene was not an isolated event. In August 2023, Hurricane Idalia resulted in more than 170,000 Georgia Power customers losing power.[2] In January 2025, winter storm Cora knocked out power to almost 300,000 customers in North Georgia.[3] The increasing frequency of extreme weather events across the state and region makes it even more important that utilities such as Georgia Power make resilience a high priority.

Q. HOW DOES THE COMPANY ADDRESS RESILIENCE IN THE IRP?

A. In recognition of the need to address resilience, the Company has proposed customer programs to promote customer-sited resiliency assets, including the Solar Plus Storage Pilot Program and DER and Demand Response offerings. However, the IRP does not include or otherwise propose that the Company conduct a comprehensive study of its resilience needs.

Q. HAS GEORGIA POWER COMPLETED ANY REPORTS OR ANALYSES OF RESILIENCY IMPROVEMENTS FOLLOWING HURRICANE HELENE?

A. To my knowledge, the Company has not completed any reports or analyses regarding the resiliency improvements of Georgia Power's system following the impacts of Hurricane

[1] Attachment to Company Response to STF-DEA-2-6.
[2] Press Release: *Georgia Power crews restoring power as Hurricane Idalia continues impacting the state* (Aug. 30, 2023), https://www.georgiapower.com/news-hub/press-releases/georgia-power-crews-restoring-power.html
[3] *Georgia Power restores power to 230,000+ customers following Winter Storm Cora*, 8 News Now, https://www.8newsnow.com/business/press-releases/cision/20250111CL94221/georgia-power-restores-power-to-230000-customers-following-winter-storm-cora/.

Helene.[4]

Q. WHY IS IT IMPORTANT FOR THE COMPANY TO ENGAGE IN RESILIENCE PLANNING?

A. By engaging in proactive resilience planning and coordination with local governments, Georgia Power can prioritize investments in transmission and distribution resources that would provide the greatest benefit to the communities that they serve. This process would also help local governments and other community-serving institutions identify critical resilience needs and prioritize location-based investments within their service territories.

Q. WHAT ARE OTHER PEER UTILITIES DOING IN TERMS OF RESILIENCE PLANNING?

A. Regulators in 14 states, including Nevada, Texas, Florida, and Louisiana, have established resilience plan requirements for regulated utilities.[5] Through June 2024, at least 30 utilities had filed resilience plans.[6] And in December 2024, Duke Energy Corporation completed a Climate Resilience and Adaptation Study for all seven of its utility service territories, including those in Florida and the Carolinas.[7] This study assessed the physical vulnerabilities and risks posed to Duke's transmission and distribution, generation, and Piedmont Natural Gas assets and operations across multiple climate scenarios, reviewed potential adaptation actions to enhance system resilience, and identified high-priority

[4] Company Direct Testimony Tr. at 475:18-476:11, 477:7-18.
[5] Josh Schellenberg & Lisa Schwartz, *Grid Resilience Plans: State Requirements, Utility Practices, and Utility Plan Template*, Lawrence Berkeley National Laboratory at 5 (July 2024), https://eta-publications.lbl.gov/sites/default/files/grid_resilience_plans_template_report_20240723.pdf.
[6] APS, Duke, other utilities pursue new climate resilience strategies as some await upcoming tools | Utility Dive
[7] Duke Energy and Guidehouse, Climate Resilience and Adaptation Study, at 4 (December 2024), https://www.duke-energy.com/-/media/PDFs/our-company/Climate-Resilience-and-Adaptation-Study-2024.pdf.

projects to help Duke Energy fulfill its commitment to provide reliable energy to its customers.

Q. HOW WOULD LOCAL GOVERNMENTS IN GEORGIA BENEFIT FROM ENGAGING IN COORDINATED RESILIENCE PLANNING WITH THE COMPANY?

A. Local governments provide essential public functions, such as emergency response, public safety, sanitation, and wastewater treatment, that can be impacted by even temporary outages due to severe weather. Engaging in coordinated resilience planning with the utility can help ensure that both the local governments and utility prioritize infrastructure investments to avoid or mitigate potential weather impacts to these public functions. As other peer utilities have recognized, partnering with local communities to incorporate their priorities is a critical component of resilience planning.[8] This coordination could also enhance local buy-in for Georgia Power projects and grid maintenance activities, potentially helping the Company avoid costly delays and other impacts to critical projects.

Q. WHAT STEPS ARE LOCAL GOVERMENTS IN GEORGIA TAKING TO IMPROVE RESILIENCE?

A. Local governments, including members of the Coalition, are establishing back-up power systems, microgrids, and resilience hubs to improve the resilience of our communities. Investments in distributed energy resources and battery energy storage systems are being made to maintain power delivery to critical facility loads, providing physical resilience

[8] Duke Energy & ICF, DEC/DEP T&D Climate Resilience and Adaptation Report, at 40 (Sept. 2023), https://www.duke-energy.com/-/media/pdfs/our-company/carolinsresiliencetransdiststudyfinal.pdf?rev=82818c7b1c2e4e158dafd5db37d79395.

enhancements. At appropriate community facilities, local governments are also establishing resilience hubs, which are augmented with additional staff, resources, and services to meet the needs of residents before, during, and after disruptions.[9] Georgia Power's customer programs can support these critical investments, especially in paired solar and battery storage, providing meaningful local resilience benefits and system-wide value to the grid.

Q. PLEASE DESCRIBE THE PAIRED SOLAR AND BATTERY STORAGE RESILIENCE PROJECTS BEING DEVELOPED BY THE CITY OF DECATUR.

A. The City will be developing an integrated 170 kW rooftop solar array, 250 kW/500 kWh battery energy storage system, and 50 kW direct current ("DC") fast charger microgrid at the Decatur Police Department. This project, supported by secured federal community project funding and a City-funded match, will support the continued delivery of public safety services, advance on-site renewable energy generation, and facilitate the electrification of the City's fleet, advancing the goals of the Decatur Clean Energy Plan. The City expects to begin detailed system design and engineering this summer and issue a request for proposals ("RFP") for final engineering, procurement, and construction ("EPC") this fall. This project will integrate learnings from the City's first rooftop solar and battery storage project, which was installed at the City's Public Works facility through the Georgia Environmental Finance Authority's ("GEFA") Solar Resilience Technical Assistance Program.

[9] Urban Sustainability Directors Network, Guide to Developing Resilience Hubs, at 8 (2019), https://resilience-hub.org/wp-content/uploads/2019/10/USDN_ResilienceHubsGuidance-1.pdf.

Q. IS THE CITY OF ATLANTA DEVELOPING SIMILAR RESILIENCE HUBS?

A. Yes. The City of Atlanta is actively pursuing several projects, including seeking matching federal and state funds to install a solar photovoltaic system with battery storage at the Central Park Recreation Center that provides Atlanta residents with a safe, warm place to shelter from freezing temperatures. The Central Park Recreation Center (12,048 sf) is a community center that serves as a warming center and a critical resource for emergency response during extreme weather by offering a publicly accessible heated space and providing necessities like food, blankets, and warm clothing. At the facility, the City of Atlanta plans to install a solar system paired with a battery that has a maximum export capacity of approximately 250kW. This project will help ensure that heat, lighting, and essential medical services remain available at the facility during power outages caused by winter storms, extreme weather, or grid disruptions. The City has also sought funding for paired solar and battery storage installations to serve warming centers at the Old Adamsville and Selena Butler Recreation Centers.

Q. WHAT PROMPTED THE CITY OF ATLANTA TO PURSUE THESE PROJECTS?

A. Atlanta's power grid is highly vulnerable during winter storms, with past events like Winter Storm Cora (January 2025) and Winter Storm Izzy (January 2022) causing widespread outages that left thousands without heat. During Winter Storm Cora, a storm-related power outage caused the lights to go out at one of Atlanta's warming centers, which was over capacity at the time. Fortunately, Georgia Power, which partners with the City through its Joint Operations Center for emergency response, was able to immediately dispatch a crew to assess and restore power within hours of the outage. However, during future events,

severe weather conditions, heavily damaged grid infrastructure, roads and access issues, or equipment and supply chain constraints could cause longer wait times that may prove dangerous or even deadly.

If a warming center loses power during extreme cold in Atlanta, it can pose serious risks to public health and safety, especially for vulnerable populations such as the elderly, young children, people with disabilities, and those experiencing homelessness. By equipping warming centers with solar power and battery storage, Atlanta can ensure that heat, lighting, and essential medical services remain available even if electric service is interrupted, reducing the likelihood of these life-threatening risks.

Q. ARE OTHER COALITION MEMBERS DEVELOPING SIMILAR RESILIENCE PROJECTS?

A. Yes. Athens-Clarke County is developing a solar plus storage project for East Athens Library with the goal of meeting 100% of the facility's electrical needs with clean energy and providing up to 4 hours of backup power for the community in the event of an outage. The project will include $1.9 M in energy-efficiency improvements as well as approximately 123 kW of solar generation, 200 kW of BESS, and 6 EV charging stations.

Q. WHAT RECOMMENDATIONS DO YOU HAVE REGARDING RESILIENCE PLANNING AND INVESTMENT?

A. Georgia Power should pursue additional opportunities to engage in proactive coordination and resilience planning with local governments in advance of extreme weather events, including by:

a. Working with stakeholders to establish a standardized process to make historic and

annual outage data readily available to local governments for use in resilience planning;

b. Partnering with local governments to evaluate resilience hubs and microgrids where they are most critically needed;

c. Ensuring that customer programs facilitate the development of resilience hubs that provide critical emergency response services and meaningful benefits to the grid; and

d. Engaging with local governments and regional commissions on resilience planning to incorporate lessons learned in the aftermath of Hurricane Helene.

Prior to the 2028 IRP, the Commission should require Georgia Power prepare and file a report assessing system vulnerabilities to extreme weather and strategies to build resilience in the aftermath of Hurricane Helene. As part of this process, the Company should hold at least three collaboration meetings with interested parties and incorporate their feedback on the report.

Q. HOW WOULD PROVIDING HISTORIC AND ANNUAL OUTAGE DATA TO LOCAL GOVERNMENTS BE BENEFICIAL?

A. Historic and annual outage data can help local governments identify the areas in their jurisdictions most prone to grid disruptions and prioritize those areas for resilience investments, including microgrids and resilience hubs. This is especially useful for jurisdictions such as the City of Atlanta and DeKalb County, which cover large service territories and have many government facilities. With limited resources, the availability of key information is necessary to support cost-effective investments that provide the greatest

benefits to our communities.

Q. WHAT TYPE OF HISTORIC AND ANNUAL OUTAGE DATA DO LOCAL GOVERNMENTS NEED FOR RESILIENCE PLANNING?

A. There are two primary types of historic and annual outage data that would be beneficial to local governments. First, data for individual local government accounts would identify the facilities and critical services that have been most prone to outages. Second, aggregated community outage data would demonstrate the areas within local government jurisdictions that more frequently experience electrical service disruptions. The level of this aggregation would depend on the availability of Georgia Power data and the geographies used by local governments in their planning processes, including neighborhoods, council districts, and zip codes.

Q. HOW CAN LOCAL GOVERNMENTS AND THE COMPANY COORDINATE WITH ONE ANOTHER FOR RESILIENCE PLANNING?

A. Using the information available to both local governments and the Company, coordinated resilience planning can identify the vulnerabilities to jurisdictions, support effective response to disruptions, develop locally informed adaptation strategies, and detail the infrastructure and facility investments planned by both parties.

IV. CUSTOMER RENEWABLE PROGRAMS

A. CARES PROGRAM & DG PROGRAMS

Q. WHY ARE THE COMPANY'S CUSTOMER RENEWABLE PROGRAMS IMPORTANT TO COALITION MEMBERS AND LOCAL GOVERNMENTS?

A. The deployment of renewable energy resources is a critical component of building more

resilient communities and achieving the clean energy goals established by Coalition members. The City of Decatur has adopted a Clean Energy Plan that sets a goal of supplying 100% of the electricity demand at City facilities with clean and renewable energy by 2030 and supplying 100% of community-wide electricity demand with clean and renewable energy by 2035.[10] The City of Atlanta and other Coalition members have adopted similar clean energy goals.

Q. WHAT SPECIFIC RECOMMENDATIONS DO YOU HAVE FOR CARES SUBSCRIPTION PROGRAMS?

A. The $5,000 NOI fee for the CARES program should be deferred or waived for MUSH customers, regardless of whether they are participating in the program within the MUSH carveout or within another segment, such as the Existing Load segment. Georgia Power should also reduce the minimum peak aggregate demand threshold to 500 kW or waive it entirely for MUSH customers, which would allow smaller MUSH customers, such as the City of Decatur, to participate in these subscription programs. The Company should not impose any "reimbursement threshold" or otherwise cap bill credits available under the CARES program. Finally, the Company should maintain the existing carveout of 50 MW for MUSH customers in the utility scale subscription program and incorporate a carveout of 10 MW in the DG subscription program.

Q. WHY SHOULD THE COMPANY WAIVE OR DEFER THE NOI FEE FOR MUSH CUSTOMERS?

A. Public sector entities like the local governments within the Coalition often lack the

[10] City of Decatur, Clean Energy Plan, https://www.decaturga.com/media/27441.

resources for an upfront payment of that amount. Moreover, as stewards of taxpayer dollars, it is hard to justify spending thousands of dollars on a program with no guarantee of being selected to participate. To even apply for the program, City of Atlanta previously had to pass legislation to accept a donation for the NOI fee. Waiving the fee entirely, or even allowing it to be paid over time, if selected, as part of the normal energy bill, would be far more feasible for local governments to participate in this program.

Q. PLEASE DESCRIBE YOUR CONCERNS REGARDING THE COMPANY'S PROPOSED REIMBURSEMENT THRESHOLDS IN THE CARES PROGRAM.

A. The Company has proposed incorporating "reimbursement thresholds" for the hourly credit calculations in both the utility-scale and DG subscriptions, which could add risk for participating customers and create additional barriers to MUSH enrollment in CARES. The hourly credit in the existing CARES program is already designed to capture the hourly costs of the Company's incremental generation per kWh. Participating customers are already required to pay a Renewable Integration Cost and Administration Fee to offset costs or burdens on non-participating customers. The Company has not come forward with any evidence indicating that the current CARES bill credit structure has failed to protect non-participating customers.

Local governments that elect to participate in the CARES program to bring online new renewable energy generation should not be required to subsidize non-participating customers if there is a favorable change in the avoided cost rate. The Commission should affirm that the current CARES bill credit structure adequately protects non-participating customers and conclude that it is not necessary to establish "reimbursement thresholds" or

otherwise cap bill credits under the CARES program.

Q. PLEASE EXPLAIN YOUR RECOMMENDATIONS FOR THE MUSH CARVEOUTS IN THE CARES SUBSCRIPTION PROGRAMS.

A. Many small local governments and other MUSH customers, including the City of Decatur, do not have an adequate aggregate peak demand to meet the 1 MW minimum threshold for MUSH customers under the current utility subscription program and C&I customers under the proposed DG subscription program. Georgia Power should reduce the minimum thresholds to 500kW or waive it entirely for MUSH customers.

In addition, Georgia Power should maintain the existing 50 MW carveout for the utility-scale subscription program and create a 10 MW carveout in the proposed CARES DG subscription program to ensure that MUSH customers have adequate opportunities to participate in these programs. The Company should increase the proposed targets for the utility scale and DG subscription programs to account for these carveouts.

Q. WHY ARE MUSH CARVEOUTS IMPORTANT FOR THESE PROGRAMS?

A. These carveouts are necessary to provide MUSH customers the time required to go through their respective review and approval processes, which may involve many stakeholders and be significantly more involved than the approval process for private-sector customers. Without these carveouts, MUSH customers run the risk that the program will become fully subscribed by private-sector customers. These programs also offer a unique opportunity to directly contribute to the growth of renewable energy on Georgia Power's grid. While Georgia Power does offer other renewable energy credit (REC) procurement options, the additionality provided by the proposed CARES program best aligns with the adopted clean

energy goals of Coalition members.

B. SOLAR PLUS STORAGE PILOT

Q. WHAT RECOMMENDATIONS DO YOU HAVE FOR THE COMPANY'S SOLAR PLUS STORAGE PILOT?

A. I have reviewed Mr. Richetta's testimony and I am familiar with his recommendations regarding this pilot program. The Company should adopt the recommendations set forth in Mr. Richetta's direct testimony to ensure that this pilot program can be successful and that customer-sited resources can play a role in meeting growing system demand.

Under the Company's proposed size limitations, residential and small and medium-sized commercial customers may not be able to appropriately size their solar and storage systems or otherwise participate in the program altogether. In fact, some of the resiliency projects being undertaken by Coalition members described in my earlier testimony may not be eligible to participate in the program depending on the configuration of the system and metered load at the facility.

If the Company elects not to remove the size limitations altogether as Mr. Richetta recommends, the Company should calculate any size limitations based solely on the maximum export capacity of the battery resources to ensure that participating customers can appropriately size their solar and storage systems. In addition, the Company should increase the maximum size limitation for commercial customers to at least 1 MW without regard to metered load. Setting the maximum size limitation at 1 MW would allow commercial customers with larger storage systems to participate in this program that would not otherwise be eligible to participate in the Company's DER Customer-Owned tariff

("DCO-1"), which limits eligibility to distributed energy resources ("DERs") with a nameplate capacity of 1 MW.

Q. WHY SHOULD MUSH CUSTOMERS RECEIVE ADDITIONAL INCENTIVES UNDER THE COMPANY'S PROPOSED RESIDENTIAL AND COMMERCIAL SOLAR PLUS STORAGE PILOT?

A. The Coalition commends the Company's proposal to provide increased incentives to MUSH customers in its proposed solar plus storage pilot program. Local governments and other MUSH customers provide critical services to their communities, which can be severely impacted by disruptions to the electrical grid. While all Georgia Power customers are impacted by power disruptions, those impacts are economic for most non-residential customers, such as disruptions to business activity. Such customers can quantify the economic benefits of resilience projects (such as the installation of on-site battery storage) and respond to the economic signals established in utility tariffs.

Local governments' critical public functions are also impacted (often severely) by power disruptions, which can be mitigated by resilience projects. However, because those services don't generate revenues in the same way that private business does, local governments do not respond to economic signals in utility tariffs in the same way that other customers do. While the interruption of public services due to power outages can have very large economic impacts, those impacts are spread across the community rather than experienced by the local government itself. For this reason, additional incentives for local governments to participate in utility resilience programs are warranted.

Increased incentive levels are necessary to facilitate the installation of solar and storage

systems for critical facilities like the ones described above and capture their corresponding benefits to the grid. In addition, these facilities provide resilience benefits to the communities they serve, which can be difficult to quantify.

Q. COALITION WITNESS BLAKE RICHETTA ALSO DISCUSSES VIRTUAL POWER PLANTS IN HIS TESTIMONY. WHAT ARE THE COALITION'S RECOMMENTATIONS WITH REGARD TO DEVELOPMENT OF A VPP?

A. Mr. Richetta discusses his extensive experience working with and deploying VPPs in other utility service territories, as well as the many benefits of VPP deployment to customers and to the utility. His testimony supports the Coalition's recommendation that the Company adopt the recommendations set forth in Mr. Richetta's direct testimony to ensure that this pilot program can be successful and that customer-sited resources can play a role in meeting growing system demand. The Commission should require Georgia Power, in coordination with Commission Staff and other interested parties, to develop a full-scale, integrated, multi-technology VPP platform for approval in the 2028 IRP. This platform should incorporate existing programs, including Temp Check, and the successful aspects of recent and upcoming pilots, such as the residential and small commercial solar and battery storage, managed electric vehicle charging, and vehicle-to-grid program pilots, as well as other smart appliances. As part of this development process, the Company should hold at least three collaboration meetings with interested parties and incorporate their feedback into their filing.

V. DEMAND-SIDE MANAGEMENT PROGRAMS

Q. PLEASE DESCRIBE THE COMPANY'S PROPOSED CASE.

A. The Company's Proposed Case includes the following items: (1) implementation of six residential and three customer programs, including the certification of a new program and continuation of four programs pursuant to a waiver of the Total Resource Cost ("TRC") test, (2) decertification of the residential Refrigerator Recycling Plus and Specialty Lighting and Commercial Behavioral programs, (3) continuation of the Learning Power Education and Energy Efficiency Awareness initiatives; and (4) continuation of pilot studies and approval of the annual pilot budget.

Q. WHAT MODIFICATIONS HAS THE COMPANY PROPOSED TO ITS DSM PROGRAMS FOR INCOME-QUALIFIED CUSTOMERS?

A. The Proposed Case expands DSM offerings to income-qualified customers, including additional measures in its Energy Assistance for Savings and Efficiency ("EASE") and Hopeworks programs. The Company has also increased the energy savings carve-out to 33% for income-qualified participants in the Residential Behavioral Program. Finally, the Company has expanded the income qualification criteria in EASE to allow moderate income customers to participate in the program and receive up to $5,000 in energy efficiency improvements.

Q. PLEASE DESCRIBE YOUR RECOMMENDATIONS FOR THE COMPANY'S PROPOSED CASE.

A. The Commission should adopt the Company's Proposed DSM Case with minor modifications to allow for the continuation of the ABT and implement some programmatic

changes to drive further energy efficiency savings. The Proposed Case is supported by the Company and achieves the DSM performance savings target of 0.75% required by the Vogtle Prudency Order. The Company projects that the Proposed Case will result in an additional 741 GWh of energy reductions annually and 224 MW of peak demand savings for the years 2026-2028.[11] During a time of unprecedented projected load growth, achieving these energy savings will be critical to allow new customers to interconnect to the grid at the least cost to ratepayers by avoiding or deferring costly transmission projects. Furthermore, the Company is proposing to expand its DSM program offerings for income-qualified customers, which will provide meaningful benefits to the communities served by Coalition members. The Coalition recommends that the Commission approve these expanded offerings to income-qualified customers, with the modifications described later in this testimony.

Q. PLEASE DESCRIBE THE AUTOMATED BENCHMARKING TOOL CURRENTLY OFFERED BY THE COMPANY.

A. The ABT provides building owners and property managers with aggregated energy consumption data for buildings with more than five tenants or buildings where property managers otherwise secure the consent of their tenants.[12]

Q. DID THE COMPANY REQUEST THE CONTINUATION OF THE ABT IN ITS PROPOSED CASE?

A. No.

[11] Direct Testimony of Beppler, Goff, Mallard and Phillips in Docket No. 56002 and 56003, page 18, lines 9-15.
[12] Georgia Power Company, *Automated Benchmarking Tool,* (last visited on May 2, 2025), https://abtgeorgiapower.sightline-icf.com/Account/Login?ReturnUrl=%2f.

Q. DID THE COMPANY PROVIDE A REASON FOR NOT REQUESTING THE CONTINUANCE OF ABT?

A. The Company's IRP and DSM Certification filings did not mention the ABT. During the Direct Hearing, Company Witness Phillips stated that the Company had not seen significant enough savings to warrant continuing the funding of the program.[13]Neither Company Witness Phillips nor Witness Goff were able to describe how the Company measured whether energy savings had been achieved.[14]

Q. WHAT IS THE ESTIMATED ANNUAL COST TO CONTINUE THE ABT?

A. According to the Company, the costs for the ABT were approximately $470,000 for the 2023-2025 period with an annual cost between $133,488 and $200,000.[15] Company Witness Goff testified that it would cost approximately $200,000 per year to continue the program.[16]

Q. DO YOU BELIEVE THE ABT SHOULD BE CONTINUED FOR THE 2025-2028 CYCLE?

A. Yes. The ABT provides commercial building owners with access to their aggregated whole building electricity usage data without significant barriers or costs. The Company does not otherwise make this type of whole building information available to commercial building owners. This tool also provides a valuable resource for commercial building owners that have multiple tenants to support compliance with benchmarking ordinances, including the City of Atlanta's Commercial Building Energy Efficiency Ordinance ("CBEEO"). Other

[13] Company Direct Testimony Tr. at 982:2-16.
[14] Company Direct Testimony Tr. at 982:17-984:8.
[15] Company Resp. to Data Request STF-PIA-2-51.
[16] Company Direct Testimony Tr. at 985:20-986:2.

local governments in the Coalition have plans to adopt similar benchmarking ordinances or building performance standards and commercial building owners in those jurisdictions would similarly benefit from the continuation of this program.

Q. HOW DOES THE COMPANY CURRENTLY DETERMINE INCOME ELIGIBILITY FOR PURPOSES OF ITS INCOME-QUALIFIED DSM PROGRAMS?

A. The Company currently offers two income-qualified DSM programs, EASE and HopeWorks, as well as an income-qualified discount. To determine the eligibility of interested customers for these programs, the Company uses age-, income-, and benefit-based criteria, which differ slightly from program to program. To participate in EASE, for example, Georgia Power customers must have a total household income at or below 200% of the federal poverty level. For the income-qualified discount, customers can qualify by being at least 65 years old and living in a household with a total income of 200% of the federal poverty level or below or by receiving benefits from the Social Security Disability Insurance, Supplemental Security Income, or federal Housing Choice Voucher programs.

Q. PLEASE DESCRIBE YOUR RECOMMENDATIONS WITH RESPECT TO INCOME VERIFICATION.

A. The Company should adopt uniform income verification qualifications across income-qualified DSM programs as well as customer renewable programs, which includes categorical eligibility requirements consistent with the GEFA Home and Energy Rebate

program.[17] If at least one person in the household participates in one of the programs listed below, the applicant should be able to use a benefit letter to qualify in lieu of submitting detailed information regarding household income:

- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Head Start
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- Lifeline support for Affordable Communications (Lifeline)
- National School Lunch Program – Free (NSLP)
- Housing Improvement Program (HIP)
- Housing Opportunities for persons with AIDS
- Supplemental Security Income (SSI)
- Weatherization Assistance Program (WAP)
- Asset Limited Income Constrained Employed (ALICE)

Q. HAS THE CITY OF DECATUR PARTICIPATED IN THE DSMWG?

A. Yes. On behalf of the City of Decatur, I have frequently participated in the DSMWG as a stakeholder and participant in recommending, advising, and collaborating with the Company on existing and potential DSM programs.

[17] Georgia Energy Finance Authority, *Participant Eligibility* (last visited May 2, 2025), https://energyrebates.georgia.gov/eligibility.

Q. WOULD YOU RECOMMEND THE CONTINUATION OF THE DSMWG?

A. Yes. The DSMWG should continue in its current form and be involved in the development of future DSM programs. The DSMWG serves an important role in assisting the Company develop its energy efficiency programs and ensures that current and pertinent information is considered by the Company.

Q. DO YOU HAVE ANY ADDITIONAL RECOMMENDATIONS FOR THE DSMWG?

A. The DSMWG should work with Georgia Power to create a centralized resource of organizations, funding and financial support programs, and use cases, which could be made available to customers. This centralized resource would act as a publicly accessible resource to help connect the ecosystem of organizations and programs that support and fund energy auditing, energy efficiency retrofits, as well as health and safety resources for the residential and commercial space. This resource would be an incredibly useful tool for Decatur's residents and businesses and those of other Coalition members for use in our public facing communications and resource offerings.

Q. PLEASE DESCRIBE YOUR RECOMMENDATIONS REGARDING ON-BILL FINANCING.

A. Geogia Power should offer on-bill financing for MUSH customers to facilitate adoption of energy efficiency measures. Many electric utilities in Georgia and elsewhere in the Southeast,[18] including Georgia Power affiliate Alabama Power,[19] offer on-bill financing

[18] Environmental and Energy Study Institute, *Interactive Map of Utilities with On-Bill Financing* (last visited on May 2, 2025), https://www.eesi.org/obf/map.
[19] Alabama Power, *Get to Know Alabama Power Smart Financing* (last visited on May 2, 2025), https://getsmartfinancing.com/blog/get-to-know-alabama-power-smart-financing/.

for energy efficiency projects. Offering on-bill financing is an innovative way to facilitate the adoption of energy efficiency measures without having to resort to increased incentive levels that may result in more costs to ratepayers.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Exhibit DAN-1

David A. Nifong
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Education

Emory University – Atlanta, Georgia (2015 – 2019)

- Bachelor of Arts in Environmental Science with minor in Community Building and Social Change
- Emory Scholar, Emory 100 Senior Honorary

Georgia Institute of Technology – Atlanta, Georgia (2023 -)

- Masters of Sustainable Energy and Environmental Management

Experience

City of Decatur, City Manager's Office – Decatur, GA

- Energy and Sustainability Manager (July 2021 – Present)
    - Directs the City of Decatur's clean energy, climate resilience, resource recovery and sustainability efforts, including policy research and design
    - Lead the development of Decatur's Clean Energy Plan
    - Coordinates the City's clean energy projects from scoping to installation
    - Serves as staff liaison to resident Environmental Sustainability Board
    - Secured approximately $1 million in federal funding and technical assistance
    - Coordinates implementation of the City's joint Climate Resilience Plan with Agnes Scott College
- Lead for America Fellow (August 2019 – July 2021)

Cross Keys Sustainable Neighborhood Initiative – DeKalb Co., GA

- Community Building and Social Change Fellow (March – December 2018)
    - Worked with supervisors and a team of peers to conduct affordable housing research along the Buford Highway corridor
    - Completed affordable housing report and presented key findings to community stakeholders. Findings were then used in organization's affordable housing plans

- Created a Housing Toolkit based upon report findings and best practices research to guide CKSNI's policy planning and development

***The Nature Conservancy* –** Atlanta, GA

- Conservation Policy Intern (Summer 2017)
  - Conducted conservation policy research for projects at the local, state, and federal level
  - Prepared detailed reports and summaries of information for the use of supervisors, such as an examination of the framework for stewardship contracting between non-governmental organizations and the United States Fish and Wildlife Service

Board and Committee Positions

Board of Directors – Southeast Sustainability Directors Network (SSDN) (December 2024 – present)

- Supported the establishment of SSDN as a standalone nonprofit organization
- Assisted in the development of Board rules, regulations, and standard operating procedures.
- Serves as a member of the Board Governance Committee.

Expert Testimony

Docket No.44280, 2022 Georgia Power Rate Case – Georgia Public Service Commission, Atlanta, GA

- Appeared on behalf of the Georgia Coalition of Local Governments to offer recommendations regarding electric vehicle infrastructure programs, rate structures, community solar, and data access

Leadership and Professional Development

Climate Reality Leadership Training – Atlanta, GA (March 2019)
City of Atlanta Office of Resilience Sustainability Ambassador – Atlanta, GA (2018)

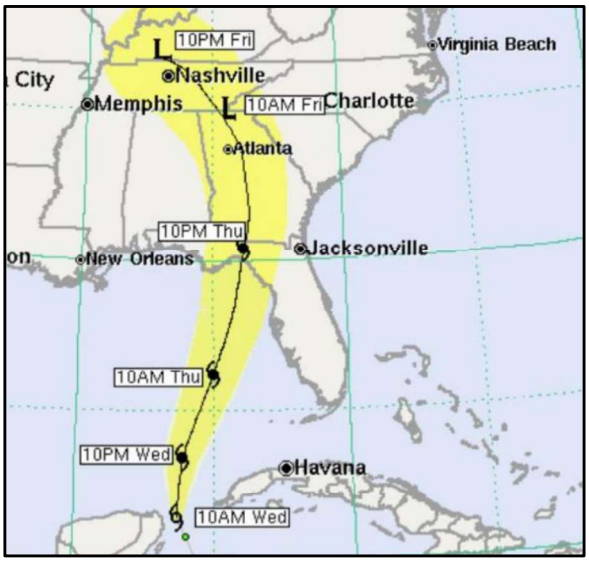
Storm Center

Georgia Power

Post Storm Summary – Hurricane Helene

Weather Recap

- On September 26th, **Hurricane Helene** entered south Georgia as a Category 1 Hurricane and **maintained status as a Tropical Storm** the entire time it moved across the state.
- Throughout the storm, **heavy rains resulted in flash floods** and saturated ground. Some areas of the state received as much as **11 inches of rain**.
- The most significant **areas of impact** were Augusta, Brunswick, Savannah, and Valdosta, with intense damage also concentrated to Vidalia and Dublin.
- The storm carried **tropical storm to hurricane force winds** to nearly **400,000 GPC customers.** Some areas saw **wind gusts between 80 – 100 miles per hour.**



Restoration Highlights

- This storm caused the **most damage to our system** of any storm in history. DAT teams found over **11,895 broken poles, 1,524 miles of wire down, 5,796 damaged transformers, and 3,200 trees down on wires** for Distribution alone. Transmission found **over 1,200 spans of transmission lines** impacted and repaired over **150 cases of broken conductor.** In total, teams replaced **345 transmission structures** and **restored over 230 facilities, including around 200 transmission lines.** In the hardest hit areas, **around 50% of transmission lines were impacted.**
- Throughout the event, crews worked diligently to safely restore power to over **1,570,000 customers**, including over **20,000 events.**
- Before Helene ever left Georgia, teams were able to restore power to **275,000 customers** and **restored 50%** of impacted customers within **48 hours** of the system entering the state.
- Teams set area ERT's as soon as they were able to do so and for the first time, provided **Substation Level ERTs**, and Feeder Level ERTs where possible to ensure **customers had the most accurate information**.
- The UAV Team received an **FAA waiver to perform drone flights above the visible line of sight**. During the first BVLOS flight in Valdosta, the pilot **assessed 8,600ft in about 16 minutes**. This same length would have taken ~2 hours without the waiver. Subsequent flights using this waiver saved transmission assessment teams incredibly valuable restoration time.
- Despite being hit hard by outer bands of Hurricane Helene and losing cell service in large portions of the area, Savannah DA crews were able to **restore power** to **all medical facilities** in the area **less than 16 hours after the storm made landfall.**

Storm Center

Georgia Power

Post Storm Summary – Hurricane Helene

Resources Engaged

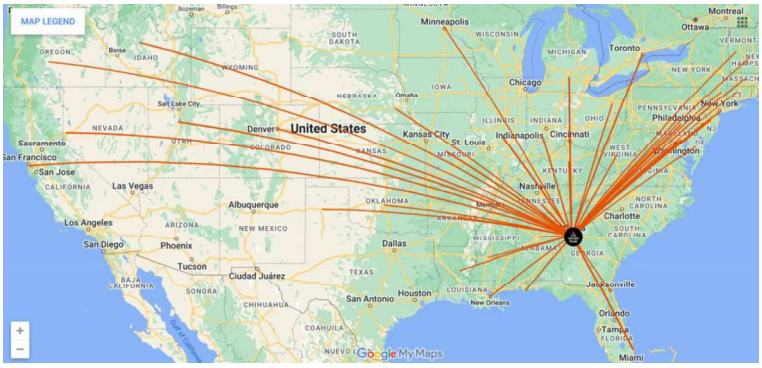
- We had an incredible response of **over 20,000 personnel** actively engaged in restoration efforts, which is more than Michael, Irma, Zeta, and Matthew combined. Specifically, we had more than **11,500-line resources**, including **1,500 Transmission** resources and **10,000 Distribution** resources.
- Crews came from all over the country and **internationally** to help us respond to Helene. In addition to resources from APC, MPC, Florida partners, and SEE Mutal Assistance, we also had crews from **35 different states** from all corners of the country along with **crews from Canada** working to restore power to Georgians. **Georgia Power Hurricane Helene Personnel Map** shows just how far crews traveled to support restoration efforts.
- Logistics teams pulled off a truly historical response in ensuring beds, food, and facilities for folks working in the field. Across the state, we had over **34 total cot sites and basecamps totaling over 25,000 beds**, supported by **hundreds of local vendors.**
- Georgia Power employees remained committed to safely and quickly restoring power. Multiple employees in the hardest hit areas cut trees to get out of their homes and into work on Friday morning. **Two employees in the Augusta area even walked to work** to be there for storm response.

20,000+

Total Personnel

34

Basecamp and Cot Site Locations



5,700

Total Vegetation Mgmt Resources

700 GPC Line Crew Resources

625 APC & MPC Line Crew Resources

1160 Native Contract Line Crew Resources

7675 Non-Native Contract Line Crew Resources

Storm Center

Georgia Power

Post Storm Summary – Hurricane Helene

Customer & Community Engagement

- Corporate Affairs engaged with multiple media outlets throughout Helene including proactive post storm safety and outage information, updates on our ongoing restoration efforts, and wrap up messaging thanking customers for their patience. They also shared content across all social media channels including preparation updates, messages from our restoration teams, live updates from the field, and more.
- Teams across Corporate Affairs and Power Delivery collaborated to maintain focus on enhancing messaging provided to customers on the **Georgia Power Outage Map** to continue to improve customer sentiment.
- Region External Affairs engaged in constant proactive communication with key stakeholders, resulting in **strengthened community relationships**. Not only did **St. Mary's Hospital in Athens offer their parking lot as a staging site**, local elected leaders, Mayor Lois Salter of Berkeley Lake (Gwinnett) and Mayor Vince William of Union City (Fulton), also sent in positive feedback celebrating our crews' hard work and **expressing gratitude for our response** to the storm.
- Customer Care leaders reached out to **71 customers** in the heavily impacted areas who **rely on medical or life support equipment** and were experiencing extended ERTs. We were able to coordinate the delivery and installation of **generators at 13 locations** to assist customers during their outages.
- One of the contractors assisting with hurricane restoration in Savannah area, SOS-MASTEC, **raised $5,300 in donations from their onsite crews** for hurricane relief. The company then matched the funds for a **total donation of $11,000**. The money will go to the Hurricane Helene Disaster Relief Fund for the United Way of the Coastal Empire, which serves 5 counties in Coastal Georgia – Chatham, Effingham, Bryan, Liberty, and Long.

3.9mil
Proactive Outage Alerts Delivered

300k
Outage Calls Received

82%
Calls Handled by IVR

78%
Positive Social Media Sentiment

Storm Center

Georgia Power

Post Storm Summary – Hurricane Helene

Damage & Restoration Photos

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 Exhibits of David A. Nifong, 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
Benjamin L. Snowden