

May 2, 2025

VIA ELECTRONIC DELIVERY

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

**Re: Direct Testimony on Behalf of Georgia Interfaith Power & Light and Southface
Energy Institute; Docket No. 56002, 56003**

Dear Ms. Tanner:

Please find enclosed an electronic version of the following **Direct Testimony of Stacy
Sherwood on behalf of Georgia Interfaith Power & Light and Southface Energy Institute** to
be filed in Docket No. 56002 and 56003.

Respectfully submitted,



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**STATE OF GEORGIA
BEFORE THE
PUBLIC SERVICE COMMISSION**

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

**DIRECT TESTIMONY OF STACY SHERWOOD
ON BEHALF OF
GEORGIA INTERFAITH POWER & LIGHT
AND SOUTHFACE ENERGY INSTITUTE**

May 2, 2025

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1 **SECTION I. INTRODUCTION AND SUMMARY**

2 **Q: PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

3 A: My name is Stacy L. Sherwood. I am a Principal with Energy Futures Group, Inc. (“EFG”)
4 which is located at 10298 Route 116, Hinesburg, Vermont 05461

5 **Q: MS. SHERWOOD, PLEASE SUMMARIZE YOUR EDUCATIONAL AND**
6 **PROFESSIONAL EXPERIENCE.**

7 A: I received a Bachelor of Arts degree in Accounting, Business Administration, and
8 Economics from McDaniel College in 2009. I have more than 15 years of experience in
9 the energy sector, related specifically to the review and development of energy efficiency
10 and demand response programs and policies. Recently, I have evaluated tariff impacts from
11 large load data centers and cryptomining facilities. In October 2021, I joined Energy
12 Futures Group as a Managing Consultant and became a Principal of the firm in 2024. Prior
13 to joining EFG, I was employed for six years by Exeter Associates, Inc., as a Senior Analyst
14 where I provided technical support and analysis to state and federal clients on energy
15 efficiency, distributed resources, demand response, and renewable energy. From 2009
16 through 2015, I worked at the Maryland Public Service Commission as a staff member
17 with a focus on the regulatory review of Maryland’s energy efficiency programs, known
18 as EmPOWER Maryland. A copy of my curriculum vitae is provided with this testimony
19 as Exhibit SLS-1.

20 **Q. PLEASE DESCRIBE SOME OF YOUR EXPERTISE IN ISSUES RELEVANT TO**
21 **THIS PROCEEDING.**

22 A. Over the last 15 years, I have reviewed utility electric and gas energy efficiency plan filings
23 and provided testimony on the reasonableness of those plans and programs before the
24 Kansas Corporation Commission, Kentucky Public Service Commission, Maryland Public
25 Service Commission, Missouri Public Service Commission, Pennsylvania Public Service
26 Commission, South Carolina Public Service Commission, Virginia State Corporation
27 Commission, and Wisconsin Public Service Commission.

28 Since 2022, I have served as the Lead Technical Consultant to the Connecticut Energy
29 Efficiency Board (“EEB”) to support the state’s energy efficiency programs. In this role, I

1 support the EEB on its monthly committee and Board meetings that monitor and review
2 the state of Connecticut's energy efficiency and demand response program as well as
3 address items such as the performance incentive mechanisms, design of income eligible
4 programs, and electrification. I review the proposed programs on a semi-annual basis as
5 the portfolios are updated by the electric and gas companies for program reasonableness.

6 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE GEORGIA PUBLIC**
7 **SERVICE COMMISSION?**

8 A. No, I have not.

9 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CASE?**

10 A: Georgia Interfaith Power and Light ("GIPL") and Southface Energy Institute
11 ("Southface").

12 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 A: The purpose of my testimony is to review the reasonableness of the demand-side
14 management ("DSM") portfolio proposed by Georgia Power Company ("GPC" or
15 "Georgia Power"), in terms of projected costs, savings, and program design. Additionally,
16 through my assessment of the proposed portfolio, I assessed potential adjustments to
17 Georgia Power's proposed demand-side management case ("Proposed Case").

18 SECTION II. FINDINGS AND RECOMMENDATIONS

19 **Q: PLEASE SUMMARIZE YOUR FINDINGS.**

20 A: Based on my review, the savings target in Georgia Power's Proposed Case is a significant
21 improvement from its past practices and should be approved with modification. Georgia
22 Power has proposed to increase DSM savings to 0.75% of retail sales, which will result in
23 considerable value for its customers, particularly given the load growth anticipated by the
24 company.

25 I recommend the Commission approve the *savings target* in the Proposed Case. I believe,
26 however, that Georgia Power can achieve its goals at a better price for billpayers. Based
27 on my review, I recommend that the Commission establish an annual budget to not exceed
28 1% of retail revenues to achieve the 0.75% savings target for program years 2026-2028.

1 As explained below, this recommended budget better aligns with industry peers. In my
2 testimony I also identify program design changes that, if implemented, will lead to more
3 cost-effective DSM and correct flawed assumptions for incentive costs, account for
4 Georgia Power's current program design, consider DSM best practices, and result in a plan
5 that is reasonable compared to peer utilities' plans. These program recommendations are
6 examples of the ways Georgia Power could reduce its budget and still achieve energy
7 savings, should the Commission so order.

8 **1. GPC Proposed Case Compared to Other Utility Plans**

9 Georgia Power's Proposed Case can and should be compared to other utilities' energy
10 efficiency and demand response program offerings to evaluate the reasonableness of the
11 proposal. Historically, Georgia Power ranks lower than its peer utilities in terms of energy
12 efficiency savings compared to retail sales and investment in energy efficiency compared
13 to retail revenues. The Proposed Case increases energy efficiency savings achieved
14 annually compared to historical achievements and meets the terms of the Commission's
15 Vogtle Order to achieve at least 0.75% of energy savings compared to retail sales; however,
16 the Proposed Case is projected to achieve these savings at a proposed cost that is 1,055%
17 higher than Georgia Power has previously invested in DSM and at a significantly higher
18 cost than other utilities nationwide. Throughout the nation, utilities with DSM spending as
19 high as 6% of annual retail revenues (GPC is projecting 6.09% of 2023 retail revenues for
20 its Proposed Case) are achieving above one percent savings compared to retail sales. That
21 other utilities achieve savings at lower budgets indicates that my recommended annual
22 budget cap of 1% of retail revenues is a reasonable funding level. The 1% of retail revenue
23 should be based on the retail revenues from the year prior to plan development, adjusted
24 for inflation.

25 **2. Issues with Georgia Power's Proposed Case**

26 The reason why Georgia Power's costs for the Proposed Case are disproportionate
27 compared to the projected level of savings is primarily due to GPC's assumption to set
28 incentives to 100% of incremental costs. Further complicating the Proposed Case
29 modeling, Georgia Power is projecting measures at costs that do not seem to accurately
30 reflect historical program performance, saturation studies, or expected investment by

1 participants. Georgia Power's energy efficiency portfolio does not take into account
2 significant potential for demand response, opportunities for industrial customer
3 participation in DSM, or other opportunities to encourage participation, such as financing
4 to encourage participation and marketing based on customer decision-making (e.g.,
5 comfort, health impacts).

6 To reduce its Proposed Case budget, Georgia Power should consider comparing its
7 program designs and incentive levels to peer utilities. Energy efficiency programs are
8 implemented across the country, providing the opportunity to identify and implement best
9 practices without having to pilot each change. In particular, Georgia Power should compare
10 its Custom Commercial Program's incentive design to other programs to determine if a
11 change would increase cost-effectiveness. Incorporating the recommended program design
12 elements while reducing the incentives offerings will reduce the overall portfolio costs
13 while still achieving a 0.75% savings target, as evidenced by other utilities.

14 **3. Impact of Cost-Effectiveness Tests**

15 The cost-effectiveness tests utilized to assess the DSM program offerings provide
16 information about the impact of the costs and benefits on various parties, including
17 billpayers, the utility, and participants. The total resource cost ("TRC") and ratepayer
18 impact measure ("RIM") tests are the primary costs discussed by Georgia Power, but the
19 portfolio was also assessed using other cost-effectiveness tests, including the program
20 administrator cost test ("PACT"), participant test, and societal test. The portfolio passes
21 the TRC test but, as is often the case with DSM programs that reduce participant energy
22 usage, it does not exceed 1.0 for the RIM test. Importantly, the PACT test, which focuses
23 on the system costs and benefits for the utility administering the DSM programs, exceeds
24 the 1.0 ratio: indicating that the Proposed Case is cost-effective for Georgia Power.

25 **4. Proposed DSM Levels for IRP Modeling**

26 Adjusting for the assumptions identified in Section IV of my testimony (using historical
27 program values and adjusting for changes in policy), I put forth an alternative case for
28 consideration in the AURORA model. This alternative case reflects GPC's level of energy
29 efficiency savings in its Proposed Case at a lower cost. The alternative case also reflects
30 an increase in the demand response program to include more homes and small business

1 customers. During the course of review, it appeared that the level of savings proposed by
2 Georgia Power in its DSM plan had not been captured in its own IRP modeling. Georgia
3 Power's modeling apparently only reflects the current level of energy savings and does not
4 factor in the Proposed Case that is projected to achieve 0.75% of retail sales.

5 **Q: PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

6 A: The Commission should approve Georgia Power's Proposed Case and significantly reduce
7 the spending to achieve the Proposed Case's targeted savings of 0.75% of retail sales. In
8 particular, the Commission should limit the budget to 1% of retail revenues, adjusted for
9 inflation. In establishing the reference year for retail rates, it should be the year prior to the
10 development of the DSM plan. For example, if the DSM plan is developed in 2025, then
11 the retail revenues would be equivalent to 1% of the 2024 retail revenue. This level of
12 spending will align Georgia Power's portfolio with the level of savings achieved by its peer
13 utilities and other across the nation and level-set the incentive structure below 100% of the
14 incremental cost. Further, the Commission can be confident that budget savings are
15 achievable if Georgia Power implements its portfolio in a manner closer to that of its
16 historical programs and industry best practices.

17 **1. Recommendations for Georgia Power to Reduce the Budget of Proposed Case**

- 18 a. The Proposed Case should utilize more reasonable levels of incentives, that are more in
19 line with past Georgia Power program offerings and peer utilities to reduce overall portfolio
20 costs.
- 21 b. Within three months, Georgia Power should provide an update on its marketing and
22 education plans to include more specifics about how it will achieve greater levels of
23 participation.
- 24 c. GPC should collaborate with its energy efficiency workforce, manufacturers and
25 distributors to accelerate an infrastructure that can support the increased level of
26 participation projected to achieve 0.75% energy savings.
- 27 d. GPC should ensure that its rebate processor is capable of handling an increase in volume
28 related to increased participation and energy savings.

- 1 e. GPC should explore financing opportunities, including on-bill financing and partnering
2 with capital lending firms, local banks, and Community Development Financial
3 Institutions.
- 4 f. GPC should focus its portfolio on long-lived savings.
- 5 g. GPC should compare its programs to peer utilities and programs available across the nation
6 and adopt best practices. In particular, Georgia Power should compare its Custom
7 Commercial Program to Duke Energy's program for its incentive design. This change may
8 increase the cost-effectiveness of this program.
- 9 h. The residential demand response program should be expanded to more residential
10 customers and include small commercial demand response customers.
- 11 i. GPC should include new construction incentives for customers seeking interconnection if
12 they build their facilities beyond the state's adopted energy codes and energy certifications,
13 such as new construction that is LEED certified.

14 **2. Recommendations Regarding Georgia Power's 2025 IRP Modeling**

- 15 a. Georgia Power's IRP modeling should reflect GPC's 2025 Proposed Case.
- 16 b. The costs used to forecast the Proposed Case costs should be established as 1% of retail
17 revenue of 2023 retail revenues.¹ Based on this assumption, the total portfolio costs for
18 2026 should be modeled at \$91.9 million.
- 19 c. The IRP modeling should reflect a higher level of demand response savings from a
20 residential and small business demand response program. I recommend a forecasted level
21 of 250 MW.

22 **Q: HAS THE COMMISSION APPROVED A DSM PLAN WITH A REDUCED**
23 **BUDGET BEFORE?**

24 **A:** Functionally, yes. In both the 2019 and 2022 IRPs, this Commission modified Georgia
25 Power's proposed energy savings targets and proposed budgets. In 2019 the Commission

¹ The DSM Plan development occurred in 2024 for the January 2025 filing, which would require the use of 2023 revenues. The 1% of retail revenue should be based on the retail revenues from the year prior to plan development, adjusted for inflation.

1 increased the energy savings target by 15% and the budget by only 10%.² In 2022, the
2 Commission increased the energy savings target by 15% and the budget by 11%.³ These
3 Orders indicate that the Commission can and has modified the Proposed DSM Case to be
4 more cost-effective and achieve greater savings.

5 **SECTION III. GPC’S PROPOSED DSM CASE COMPARED TO OTHER DSM PLANS**

6 **Q: PLEASE DESCRIBE GEORGIA POWER'S PROPOSED CASE.**

7 **A:** On January 31, 2025, GPC filed its Application for the Certification, Decertification, and
8 Amended 2025 Demand Side Management Plan with the Georgia Public Service
9 Commission. The Application requests the Commission to approve a certificate of public
10 convenience and public necessity for:

- 11 • Addition of one new DSM program: Residential Products;
- 12 • Decertification of three DSM programs: Residential Refrigerator/Freezer
- 13 Recycling, Residential Specialty Lighting, and Commercial Behavior;
- 14 • Certificate amendments of eight previously certified DSM programs: Home
- 15 Energy Improvement Program (HEIP), Energy Assistance for Savings and
- 16 Efficiency (EASE), Residential Demand Response, Residential Behavioral,
- 17 HopeWorks, Commercial Custom, Commercial Prescriptive, Small Commercial
- 18 Direct Install;
- 19 • Waivers of TRC requirement for four previously certified DSM programs: Home
- 20 Energy Improvement Program (HEIP), Energy Assistance for Savings and
- 21 Efficiency (EASE), HopeWorks, Commercial Custom; and
- 22 • Approved DSM activities as part of Docket No. 56002 regarding Georgia
- 23 Power’s 2025 Integrated Resource Plan.

² 2019 IRP Order Adopting Stipulation at page 19, Docket 42310 (July 29, 2019).

³ 2022 IRP Order Adopting Stipulation at para. 75, Docket 44160 (July 29, 2022).

1 The Proposed Case outlines a savings target of at least 0.75% of Georgia Power's annual
2 retail sales in accordance with the Commission's Order in Docket No. 29849, the Vogtle
3 Prudency Proceeding. The Proposed Case supports 224 megawatts ("MW") of demand
4 reduction and 741 gigawatt-hours ("GWh") in energy consumption reductions annually for
5 the years of 2026 through 2028. Georgia Power projects the three-year program cost to be
6 \$1,696,342,916, or an annual average of \$565,447,639.

7 **Q: WHEN REVIEWING DSM PORTFOLIOS, WHAT ANALYSIS DO YOU**
8 **PERFORM?**

9 A: To review DSM portfolios, I:

- 10 • Review program offerings to assess program design, measure offerings, and best
11 practices;
- 12 • Assess reasonableness of proposed savings and costs as compared to historical
13 utility performance, as well as other utilities;
- 14 • Review marketing initiatives, consider workforce development, and customer
15 education; and
- 16 • Assess changes in customer demographics, energy policies, and codes and
17 standards.

18 **Q: IS IT APPROPRIATE TO COMPARE DSM PORTFOLIOS BETWEEN**
19 **UTILITIES?**

20 A: Yes. When comparing utility DSM portfolios, it is difficult to account for the varying
21 climate, policy, and building types in each service territory. Therefore, broad comparison
22 between utilities, such as that done by the American Council for an Energy-Efficient
23 Economy's (ACEEE's) Utility Scorecard, can provide good overall benchmarking. In the
24 2023 ACEEE Utility Energy Efficiency Scorecard (Scorecard), 53 of the largest U.S.
25 electric utilities were evaluated based upon three areas (1) the 2021 performance of the
26 energy efficiency programs in areas such as spending, annual and lifetime savings and
27 demand reduction, and investment in low income, (2) 2021 program offerings such as
28 comprehensive and number of program offerings, and including emerging programs and
29 pilots, and (3) enabling of energy efficiency plans through the offering of performance

incentives, cost recovery mechanisms, inclusion of DSM in resource planning and establishment of energy savings targets.⁴

To allow for comparisons across utilities of varying sizes and in different regions, comparisons of energy efficiency investment in the report were assessed by reviewing the total energy efficiency spending compared to a utility's retail revenues and achieved energy efficiency savings was compared to a utility's retail sales.

Q: HOW DID GEORGIA POWER FARE ON THE SCORECARD?

A: Figure 1 below shows the rankings from the 2023 ACEEE Scorecard, of which Georgia Power was included within the 53 utilities and ranked 33rd overall.

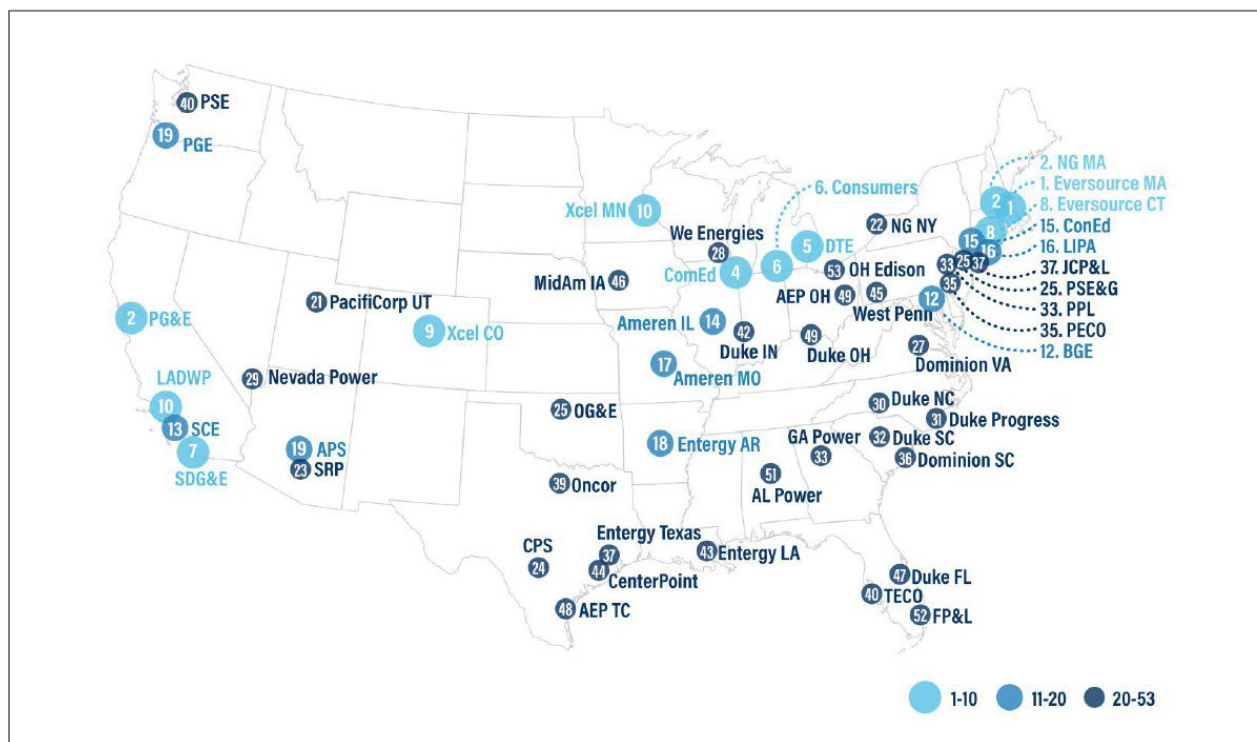


Figure 1. 2023 ACEEE Scorecard Utility Rankings for Energy Efficiency⁵

On average, the level of investment in energy efficiency compared to retail sales was 3.32% to achieve 0.75% or higher. Figure 2, below, indicates the level of savings and spending

⁴ Specian, M., W. Berg, S. Subramanian, and K. Campbell. 2023 Utility Energy Efficiency Scorecard at 22-24 (Aug. 24, 2023). ACEEE. Retrieved from www.aceee.org/research-report/U2304. Note that while the report is called the 2023 Scorecard, the information is based upon 2021 data.

⁵ *Id.*, Figure ES-1 at 11.

assessed for the 53 states assessed. The average savings and spending compared to retail sales and retail revenues, respectively, is shown in green and GPC's is shown in orange. In 2021, Georgia Power achieved 0.33% of savings compared to retail sales based upon an investment of 0.63% of energy efficiency funds compared to retail revenues. As shown below, GPC's investment in energy efficiency and resulting savings is below the average of 0.91% of energy efficiency savings compared to retail sales and 2.23% of energy efficiency spending compared to retail revenues.

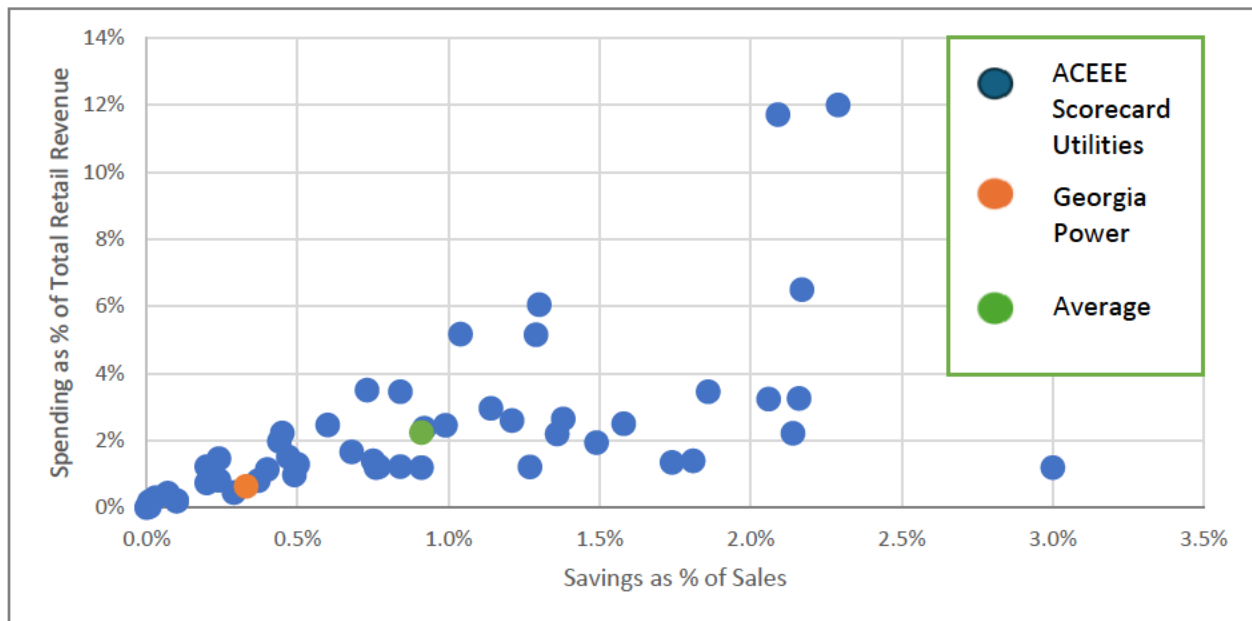


Figure 2. Comparison of Utilities' Investment in Energy Efficiency based upon Revenues and Electric Sales (2021)

Q: WHAT DOES THIS CHART TELL YOU ABOUT GEORGIA POWER PROPOSED DSM CASE HERE?

A: Reviewing net savings as a percentage of sales, 20 of the 53 utilities achieved more than one percent savings, ranging from 1.04% to 3%, and 8 utilities achieved between 0.75% and 1% savings. This indicates that the level of savings in Georgia Power's Proposed DSM Case of 0.75% is achievable.

Q: WHO MAY BE CONSIDERED GEORGIA POWER'S DSM PEERS AND WHY?

A: Factors such as climate, housing types, and workforce can impact program design, so it can be important to perform a deeper comparison to peer utilities that face similar conditions. In outlining peer utilities for comparison to Georgia Power's Proposed Case, it makes sense

1 to choose utilities in the southeastern portion of the U.S., such as Duke Energy Carolinas
2 and Duke Energy Progress in North Carolina and South Carolina, and Dominion Energy
3 South Carolina. When addressed as a group in my testimony, they will be referred to as
4 “Peer Utilities.” These utilities are located in states that have similar temperatures,⁶
5 residential data in terms of energy usage, percentage of households using air conditioners,
6 and total square foot per home.⁷

7 Further, the Peer Utilities have the same equipment efficiency regional requirements for
8 equipment efficiency as established by the U.S. Department of Energy,⁸ and have strongly
9 overlapping climates as indicated in the International Energy Conservation Code climate
10 zone map establishing baselines for energy efficiency.⁹ Figure 1, above, also indicates that
11 among the 53 largest utilities in the ACEEE 2023 Scorecard, these utilities in 2021 ranked
12 alongside one another in terms of energy efficiency program offerings and performance,
13 with Duke Energy Carolinas NC ranking 30th, Duke Energy Progress NC ranking 31st,
14 Duke Energy Carolinas SC ranking 32nd, and Dominion Energy SC ranked 36th.
15 Also, these utilities offer similar programs and measures to one another, from residential
16 to commercial programs and for income-eligible customers. While there may be some
17 program variances, such as programs specifically designed for housing types such as
18 manufactured housing or portfolios designed for industrial customers, the policies that
19 guide the program assumptions, climate, and housing stock are similar, which is important
20 when evaluating the reasonableness of the Proposed DSM Case plan design.

⁶ U.S. National Oceanic and Atmospheric Administration’s National Centers for Environmental Information, Climate at a Glance Statewide Mapping (Apr. 2025). Retrieved from <https://www.ncei.noaa.gov/access/monitoring/climate-at-a-glance/statewide/mapping/110/tavg/202003/60/value>. Note that this tool is based upon statewide average temperature during the period of April 2015 through March 2020.

⁷ Based upon the comparison of data from the U.S. Energy Information Administration’s 2020 Residential Energy Consumption Survey (RECS) Dashboard (last accessed May 1, 2025). Retrieved from <https://experience.arcgis.com/experience/cbf6875974554a74823232f84f563253>.

⁸ International Code Council, 2023 DOE HVAC Efficiency Requirements (last accessed May 1, 2025). Retrieved from <https://www.iccsafe.org/products-and-services/i-codes/doe-seer2-eer2/#map>.

⁹ U.S. Department of Energy’s Office of Energy Efficiency and Renewable Energy, IECC Climate Zone Map (last accessed May 1, 2025). Retrieved from <https://basc.pnnl.gov/images/iecc-climate-zone-map>.

Q: PLEASE DETAIL HOW THE PEER UTILITIES COMPARE TO ONE ANOTHER AND TO GEORGIA POWER'S PROPOSED CASE IN TERMS OF DSM PERFORMANCE?

A: To compare the Peer Utilities, I calculated the same metrics as in the ACEEE Scorecard using 2023 data from the U.S. Energy Information Administration. Table 1 below shows a comparison of Peer Utilities' 2023 energy efficiency results to Georgia Power's 2023 energy efficiency results and to its Proposed Case.

	Georgia Power Proposed Case (2026)	2023 Annual Energy Efficiency Results					
		Georgia Power	Duke Energy Carolinas NC	Duke Energy Progress NC	Duke Energy Carolinas SC	Duke Energy Progress SC	Dominion Energy SC
Savings as a Percentage of Retail Sales	0.88%	0.33%	1.01%	0.95%	0.99%	1.01%	0.52%
Spending as a Percentage of Retail Revenue	6.07%	0.57%	1.29%	1.45%	1.24%	1.59%	1.10%

Table 1. Comparison of Savings and Spending on Energy Efficiency Among GPC's Peers¹⁰

Figure 3 provides a visual representation of Table 1, which reveals the disproportionate level of spending proposed by Georgia Power compared to Georgia Power's own spending and savings in 2023. Similarly, the Peer Utilities achieve comparable savings at a drastically lower investment level than that projected by GPC (ranging from 1.24% to 1.59% of retail revenues, compared to GPC's proposed 6.07%). As discussed in Section 4 of this testimony, Georgia Power's proposed incentives are a significant component of the assumed costs here. For further comparison to other utilities, Figure 2 above indicates that a significant number of large investor-owned utilities achieve higher than 0.75% savings, as high as above 2.0%, with DSM portfolio costs below 4% of retail sales.

¹⁰ 2023 Annual Energy Efficiency Results based upon the energy efficiency and retail sales and revenues from the U.S. Energy Information Administration's Form EIA-861 for 2023.

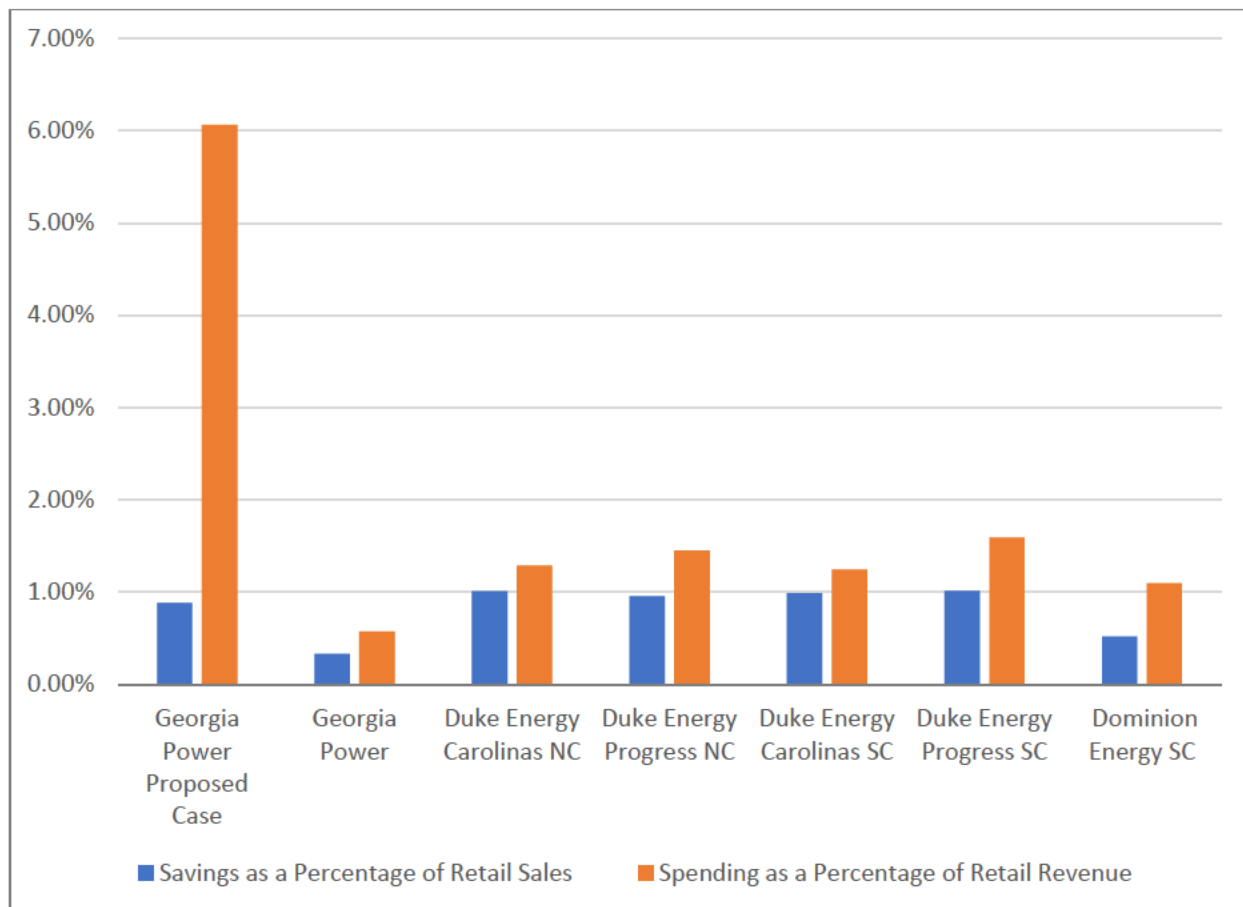


Figure 3. Comparison of 2023 Savings and Spending on Energy Efficiency Among GPC's Peer Utilities

Q: ARE THERE OTHER WAYS TO COMPARE THE REASONABLENESS OF GPC'S PROPOSED CASE?

A: Peer Utilities' energy savings can also be compared to GPC's Proposed Case based on a cost per kilowatt-hour (kWh) basis not only at the total portfolio level, but also by sector (residential and commercial), as shown in Figure 4.

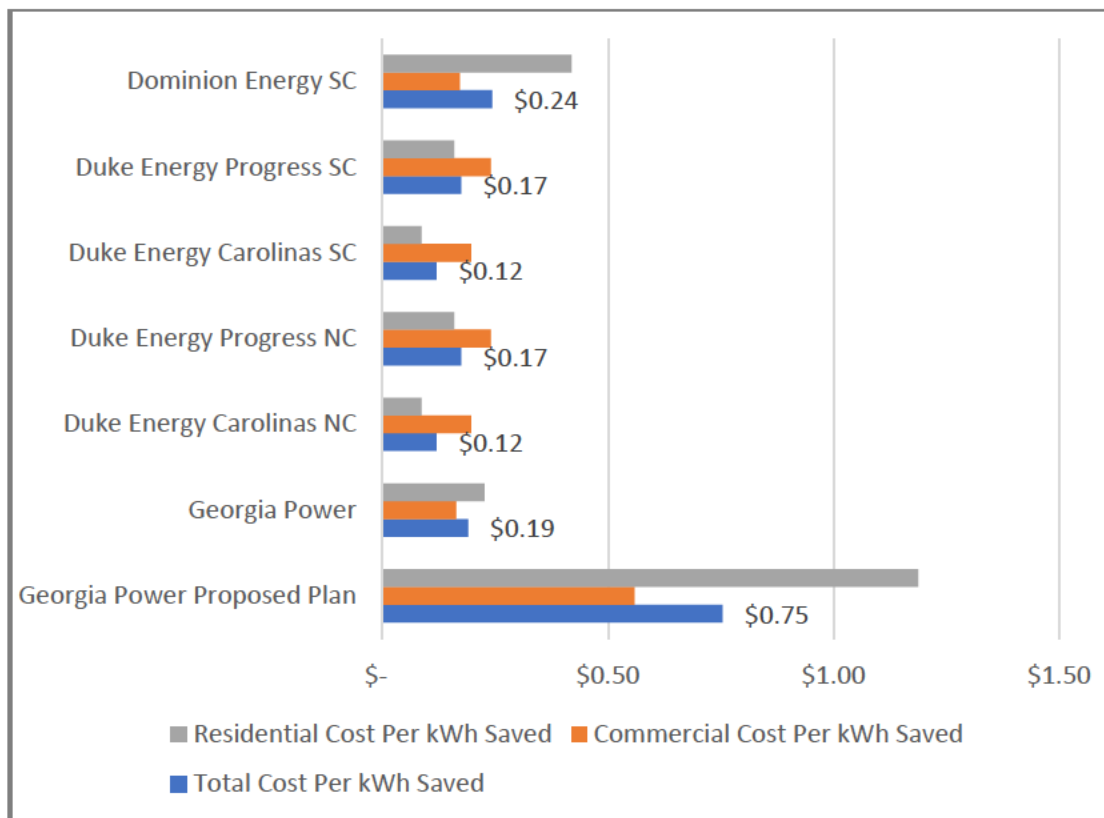


Figure 4. Peer Utilities' Cost Per kWh Saved

Figure 4 shows the cost to achieve one (1) kWh of savings in 2023 broken down by sector and compared to GPC's Proposed DSM Case. In 2023, GPC's programs were the second costliest among the Peer Utilities but overall were in general alignment, as the cost per kWh ranged from \$0.12 to \$0.24. GPC and Dominion Energy SC's 2023 programs experienced higher costs for its residential energy efficiency programs when compared to the cost of their commercial programs, whereas the Duke Energy programs experienced higher costs to obtain commercial energy savings. This difference between is likely attributable to program design and customer types but also utility rates and rate structures.

In 2023, the Peer Utilities are within an average range to achieve energy savings. However, GPC's Proposed Case in this docket costs 424% more than it did in 2023, with the greater increase occurring in the residential portfolio, increasing by 297% compared to 2023. As discussed below, the increased cost is directly attributable to GPC's assumption of 100% incremental cost incentives.

1 **SECTION IV. ISSUES WITH GPC PROPOSED CASE**

2 **Q: YOU ASK THE COMMISSION TO APPROVE THE PROPOSED DSM CASE'S**
3 **SAVINGS TARGET BUT AT A LOWER COST. WHAT CONCERNS DO YOU**
4 **HAVE WITH GPC'S PROPOSED CASE AS SUBMITTED?**

5 A: In reviewing the Proposed Case and its supporting assumptions, my primary concerns are:
6 (1) the level of incentives,
7 (2) the lack of increased education and awareness for customers to know that the programs
8 exist to increase participation,
9 (3) the lack of discussion related to program implementation and preparation for an
10 increase in participation,
11 (4) the proposed measure mix does not appear reasonable,
12 (5) that there are program design options Georgia Power did not appear to consider to
13 increase participation outside of providing 100% incentives, and
14 (6) the failure to provide options to address energy efficiency with large users and those
15 interested in receiving service from GPC despite the TEAPot study identifying such
16 savings opportunities.

17 **Q: COULD ADDRESSING THESE CONCERNS REDUCE THE COSTS OF THE**
18 **PROPOSED CASE WHILE MAINTAINING THE SAVINGS?**

19 A: Yes. The proposed changes I discuss below are based on best practices, including ones
20 from the identified Peer Utilities. As shown above, the Peer Utilities are able to achieve
21 higher levels of savings than proposed by Georgia Power at a significantly lower cost.
22 Georgia Power should be able to achieve similar results as its peers.

23 **Q: REGARDING THESE CONCERNS AND RECOMMENDATIONS THAT**
24 **FOLLOW, ARE YOU REQUESTING THE COMMISSION ORDER GEORGIA**
25 **POWER TO TAKE EACH OF THESE ACTIONS?**

26 A: No. While the Commission could determine any or all of these recommendations are
27 appropriate to reduce the Proposed Case's budget. At this time, I am not recommending
28 specific action but rather highlighting that these recommendations, if implemented, will

1 lead to more cost-effective DSM and correct flawed assumptions for incentive costs,
2 account for Georgia Power's current program design, consider DSM best practices, and
3 result in a plan that is reasonable compared to peer utilities' plans.

4 **Q: PLEASE DESCRIBE YOUR CONCERN RELATED TO THE LEVEL OF**
5 **INCENTIVES.**

6 A: Georgia Power has established the level of incentives at 100% of incremental cost for most
7 measures. Incentives can be set at various levels of the incremental cost, which is the
8 difference between the cost of the baseline equipment and the more efficient equipment.
9 Here GPC opted to design most of the incentives to provide participants with the full
10 incremental cost. Therefore, from the participant's perspective, the price to purchase the
11 efficient equipment or the baseline equipment would be the same.

12 This is an unrealistic program design, which ignores one of the purposes of energy
13 efficiency programs, and frankly, is something I have not witnessed in my career. One of
14 the purposes of energy efficiency is to drive market transformation by eliminating barriers
15 such as cost, lack of awareness, and availability of technology and supporting workforce.
16 It appears that the Proposed Case will address the issue of cost barriers by eliminating the
17 incremental cost; however, that will result in over incentivizing participants, which is not
18 necessary and a waste of billpayer funds when participation can be achieved for a lower
19 cost.

20 The prior assessment of Peer Utilities, where savings close to 1% or greater were achieved
21 through lower costs, demonstrates that incentives at 100% are not necessary. Assuming
22 100% incentives also ignores the fact that participation occurs for a myriad of reasons such
23 as reducing energy bills, health impacts, and social and environmental impacts. That is, the
24 incentive level may not be the motivator for certain program participants and as a result,
25 Georgia Power should expand beyond its focus on incentives to increase participation, such
26 as offering financing and marketing efforts.

1 **Q: HOW DO THE PROPOSED INCENTIVES LEVELS COMPARE WITH**
2 **CURRENT GEORGIA POWER DSM OFFERINGS?**

3 A: Reviewing the Home Energy Improvement Program's (HEIP's) current incentive
4 offerings, for example, there appears to be a significant increase from current incentive
5 levels. This is perplexing, as Georgia Power is able to achieve participation at significantly
6 lower incentive levels than being proposed, yet that does not appear to be taken into
7 consideration during the development of the Proposed Case. As mentioned above, greater
8 participation can be gained through marketing campaigns that appeal to various reasons for
9 participating, offering financing to cover cost burden outside of the incremental cost of
10 efficiency, and expanding a workforce that is educated in programs and energy efficiency
11 sales.

12 Table 2 below identifies HEIP measure offerings, the current incentive level and the
13 proposed rebate amount per the Proposed DSM Case. The most striking Proposed DSM
14 Case rebate is the one designed for heat pumps, which would offer incentives up to \$7,386
15 for residential customers seeking a ground source heat pump. That is not an appropriate
16 use of billpayer funds, particularly for lower income customers and is more than seven
17 times the current rebate level.

Measure	GPC Current Rebate	GPC Proposed Case Rebate
Attic Insulation	\$250	\$964
Heat Pump Water Heater	\$1,000 (50% of cost up to \$1,000)	\$333-\$1220
Smart Thermostat	\$200	\$47-\$158
Electric Vehicle Charger	\$50	\$1,397
Advanced Power Strip	\$20	\$13-70
Pool Pump Timer	\$150	\$226-\$474
ENERGY STAR Ceiling Fan	\$35	\$39
Circulation Pump	\$40	\$557
ENERGY STAR Dehumidifier	\$25	\$20
Home Energy Management System	\$175	\$1,602
Air Sealing	\$300	\$1,512 on average
Duct Sealing	\$300	\$90-327
Ductless Mini-Split & Ground Source Heat Pump	\$1,000	Ductless Mini-Split \$2,924-\$5,848 Ground Source Heat Pump \$7,386

Table 2. HEIP Rebate Comparison, Current to Proposed DSM Case¹¹

Q: HOW DO THE PROPOSED INCENTIVES LEVELS COMPARE WITH PEER UTILITIES' INCENTIVE OFFERINGS?

A: While some rebates appear to be in line with the Duke Energy utilities, some of the larger rebates are not. As shown in Table 3 below, ductless mini-splits appear to have the largest difference in rebates, followed by air sealing, attic insulation, and heat pump water heaters.

¹¹ Georgia Power response to STF-PIA-2-2 Attachment; incentive levels for the existing program can be found here: <https://www.georgiapower.com/residential/save-money-and-energy/products-programs/home-energy-efficiency-programs/home-energy-improvementprogram.html> (last accessed May 1, 2025). Proposed incentive levels are from Georgia Power's response to STF-PIA-2-2 Attachment.

Measure	GPC Proposed Case Rebate	Duke Energy Rebate
Air Sealing	\$1,512 average	Must be combined to receive incentive \$700
Attic Insulation	\$964	
Heat Pump Water Heater	\$333-\$1220	\$350-\$500
Smart Thermostat	\$47-\$158	\$50-\$125
Duct Sealing	\$90-\$327	\$100-\$350
Ductless Mini-Split	\$2,924-\$5,848	\$700
Air Source Heat Pump	\$718	\$350-\$900

Table 3. HEIP Rebate Comparison, GPC Proposed to Peer Utilities

Q: WHAT IS GEORGIA POWER’S RATIONALE FOR PROVIDING INCENTIVES AT THAT LEVEL?

A: Georgia Power did not provide detailed rationales at the measure or even the program level, but generally stated in response to Data Request STF-PIA-2-10 that the program participation forecasts were developed based upon historic program participation and Georgia Power’s 2024 Technical Economic and Achievable Potential (TEAPot) report, planning staff, and evaluation results. Additionally, on the stand, Witness Phillips indicated that GPC “chose [a] 100 percent incentive level to help reach the .75 percent of retail sales for the [Proposed DSM Case]. Specifically, when looking at the most recent TEAP[ot] report, for the year 2025, in order to achieve .7 percent of sales in that year, it would have required a 100 percent incentive level.”¹²

Figure 5, from the 2024 TEAPot Report, does indicate that even when including savings from all three sectors, residential, commercial, and industrial, with incentives at 100% of incremental costs, not enough savings would be generated to achieve 0.75% savings. While

¹² 2025 Direct Hr’g Tr. 1070:25-1071:5.

that may be the case in the first year, the level of savings increases over the years, regardless of the incentive level. If relying only on the TEAPot Report, it would seem necessary to establish incentives at 100% to achieve that level of savings in the first year. However, it would not be necessary to do so in future years. This is particularly true as the 25% incentive level scenario identified that it could reduce electricity sales by 2.4% of the projected 2035 load.¹³

Second, potential studies like the TEAPot are known to be conservative and may be limited by the direction of the party funding the study. As noted by ACEEE, “[g]iven . . . the generally conservative approach of these studies, there is likely a great deal of additional cost-effective potential available beyond what is identified.”¹⁴ Therefore, while the model may indicate that 100% incremental incentives are needed to achieve the savings, it is not necessarily true, especially as other states are achieving noticeably higher savings at a lower cost.

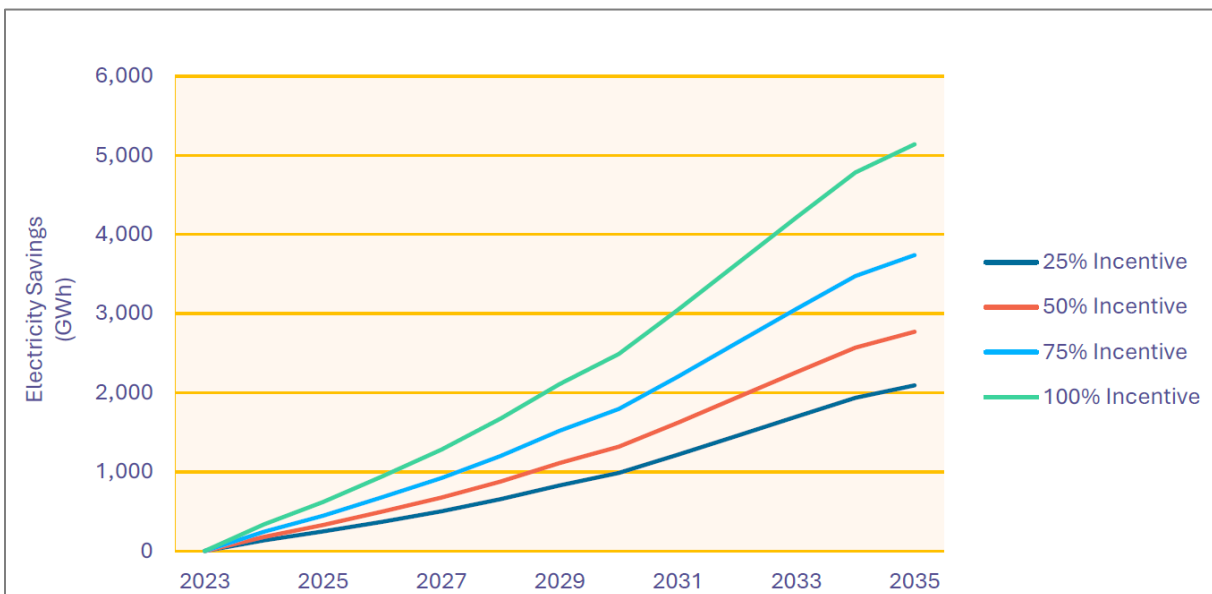


Figure 5. 2024 TEAPot Report Electricity Savings Forecast for Achievable Potential¹⁵

¹³ Achievable Energy Efficiency Potential Assessment (Referred to as “2024 TEAPot Report”) at 12, Applied Energy Group, Inc., (Jan. 30, 2024).

¹⁴ Cracking the TEAPOT: Technical, Economic, and Achievable Energy Efficiency Potential Studies at 39, ACEEE (Aug. 2014). Retrieved from <https://www.aceee.org/sites/default/files/pdfs/u1407.pdf>.

¹⁵ *Id.* at 13.

1 **Q: DO YOU HAVE ANY ADDITIONAL CONCERNS WITH THE LEVEL OF**
2 **INCENTIVES PROPOSED?**

3 A: Yes. Offering incentives at this level should follow, not lead, extensive marketing and
4 education in the service territory. Otherwise, there is a risk that the program will attract
5 those who would already be investing in energy efficiency at their own cost – potentially
6 resulting in free-ridership.

7 **Q: PLEASE DETAIL YOUR RECOMMENDATION RELATED TO INCENTIVES.**

8 A: Georgia Power should limit its incentives to more reasonable levels, closer to those
9 currently offered by Georgia Power and its peers. Using that knowledge, Georgia Power
10 should reassess the level of incentives necessary to achieve 0.75% energy savings,
11 recognizing that the measure mix forecast within the 2024 TEAPot report is not going to
12 match the actual measure mix and take into account the historical incentive levels and the
13 participation rates.

14 The Commission should limit the cost of the DSM Plan to 1% of retail revenue, to avoid
15 using billpayer funds to provide 100% incentives toward incremental costs. GPC should
16 be instructed to implement a more reasonable portfolio that accounts for the factors above
17 when considering forecast related to incentive and measures. In establishing incentives that
18 achieve 0.75% energy savings with a budget of 1% of retail revenues, GPC could compare
19 its forecasted plan to the Peer Utilities identified in the prior section of this testimony to
20 assess whether the proposed costs and incentive levels are reasonable.

21 Due to the amount of projected incentive costs per year—which is 83%, or \$463 million,
22 of the total estimated annual program costs—it is not reasonable for Georgia Power to
23 simply adjust the level of incentives. While it may not be practical for Georgia Power to
24 rerun its entire analysis, it will need to make meaningful adjustments to the Proposed Case
25 to refine its budgeted spending, savings, and participation.

26 **Q: PLEASE DESCRIBE YOUR CONCERNS RELATED TO EDUCATION AND**
27 **AWARENESS.**

28 A: The DSM Plan provided by Georgia Power does not address how it plans to increase
29 education and awareness of its program offerings and incentives. Georgia Power has
30 included less than one page related to a marketing plan for the general awareness and

1 marketing of the programs nor does it outline how or when it will provide additional
2 marketing details to support the level of forecasted participation.¹⁶ Greater awareness of
3 the programs and the associated benefits for both customers and contractors can lower the
4 level of incentives offered.

5 **Q: PLEASE DESCRIBE YOUR RECOMMENDATION RELATED TO EDUCATION**
6 **AND AWARENESS.**

7 A: If the Commission directs Georgia Power to limit its DSM Plan to 1% spending, then
8 Georgia Power should provide an update addressing detailed marketing and education
9 plans for the programs that support the Plan's level of increased participation and market
10 penetration. There should be strategies, timelines, and budgets for marketing and education
11 efforts to support the proposed savings increases. While it would not be expected for
12 Georgia Power to know its exact strategy (as that can involve outside consulting which is
13 typically obtained after Commission approval), Georgia Power should be able to
14 demonstrate its general marketing plan. This update should be provided within three
15 months of Commission approval.

16 **Q: PLEASE DESCRIBE YOUR CONCERN RELATED TO PROGRAM**
17 **MANAGEMENT.**

18 A: The Proposed Case fails to address managerial efforts to increase savings, either from a
19 program management perspective, processing of rebates and applications, or workforce
20 preparation and build-out to support the increase in participation. These details are essential
21 to provide a positive experience for both the participants and the supporting workforce to
22 aid in the successful implementation of programs. Additionally, there is no indication that
23 Georgia Power has plans to or has discussed with distributors and manufacturers the ability
24 to have sufficient supply to meet demand that could be driven by GPC's program design
25 and anticipated increase in participation. This, along with customer education, is critical to
26 a portfolio that is seeking to more than double its energy savings per year from 2023
27 savings.

¹⁶ 2025 DSM Application, Docket No. 56003, Appx. A – Twelve-Year DSM Program Plans at 2.

1 **Q: PLEASE DESCRIBE YOUR RECOMMENDATION RELATED TO PROGRAM**
2 **MANAGEMENT.**

3 A: Similar to the recommendation related to marketing and education, if Georgia Power is
4 limited to 1% spending on its Proposed Case, then it should include as part of an update
5 the following for each program:

- 6 • Whether current administration is sufficient or if additional procurement will be
7 required to support the programs and rebate processing;
- 8 • The proposed rebate processing time; and
- 9 • The market situation in terms of availability of measures at that time and identify
10 any efforts that may be explored to ensure product and workforce availability.

11 **Q: PLEASE DESCRIBE YOUR CONCERNS RELATED TO MEASURE**
12 **PROJECTIONS.**

13 A: The projected number of measure and measure types do not appear to be consistent with
14 historical investment in either the GPC programs or other programs I have reviewed.
15 Additionally, the portfolio appears to have chosen measures that tend to have barriers to
16 implementation for majority of homes.

17 An example of this would be heat pump water heaters, a measure that is projected to be the
18 top rebated item under the residential portfolio. While efficient, residential heat pump
19 water heaters can have some barriers in terms of where they can be located as they require
20 certain access and air flow in order to operate properly, meaning they may not be the best
21 solution for a variety of homes and locations. In 2026 alone, Georgia Power is forecasting
22 that it will rebate over 41,000 residential heat pump water heaters, with the next highest
23 rebated measure is forecasted to be around 11,500 commercial air source heat pumps. In
24 contrast, Georgia Power is only projecting 2,250 residential air source heat pumps and
25 ductless heat pumps to be installed per year, which does not align with Georgia Power's
26 saturation study nor the prevalence of air conditioning and all-electric homes in the state
27 of Georgia. For example, the level of air conditioner penetration in the state would lead
28 one to assume that more heat pumps would be rebated than water heaters.

1 **Q: PLEASE DESCRIBE YOUR RECOMMENDATION RELATED TO MEASURE**
2 **PROJECTIONS.**

3 A: Georgia Power should be directed to provide updated projections for its measures. The
4 updated measure forecasts should take into consideration historical performance levels of
5 measures, the adjusted incentive levels below 100% of incremental cost, and be reasonable
6 based upon market availability, popularity, and customer demand.

7 **Q: PLEASE DESCRIBE YOUR CONCERN RELATED TO NON-INCENTIVE**
8 **OPPORTUNITIES.**

9 A: As stated above, Georgia Power is solely relying upon maximized incentives to garner
10 participation in its DSM offerings. However, there is another mechanism, outside of
11 incentives, marketing, education, and workforce development that should be considered.
12 Financing opportunities help to bridge cost barriers in addition to incentives. It can also be
13 a tool that allows both businesses and residents to fund energy efficiency upgrades in a
14 manner that can match the return on investment or projected savings. Options for energy
15 efficiency financing include:

- 16 • Partnering with a capital/lending firm to offer buy down interest rates on projects
 - 17 ○ Energize Connecticut offers the Smart E-Loan in partnership with the state
 - 18 investor-owned utilities and Connecticut Green Bank to buy down unsecured
 - 19 loans for residential customers.¹⁷
- 20 • Partnering with local banks and other financial institutions such as Community
 - 21 Development Financial Institutions (CDFIs) to provide financing for homeowners,
 - 22 multifamily building projects, and businesses
 - 23 ○ The Solar and Energy Loan Fund used the CDFI model to provide financing
 - 24 to underserved residential customers and small businesses to assist with
 - 25 sustainable economic development opportunities.¹⁸

¹⁷ Financing Opportunities for State and Local Governments to Improve Efficiency Across the Residential Sector at 7, U.S. Department of Energy (Dec. 2024). Retrieved from https://www.energy.gov/sites/default/files/2024-12/financing-opportunities-for-state-and-local-governments-to-improve-efficiency-across-residential-sector_121624.pdf.

¹⁸ *Id.* at 16.

- 1 • On-bill financing at 0% interest for small businesses participating in the programs
- 2 ○ Energize Connecticut programs offer zero-interest and low-cost financing for
- 3 the balance for projects through its Small Business Energy Advantage
- 4 Program.¹⁹
- 5 • On-bill financing at the meter for residential customers
- 6 ○ Duke Energy offers a program called “Improve And Save” that gives
- 7 customers the opportunity to pay for energy efficiency upgrades, even on
- 8 rental properties, over a 10-year period and the project costs remain with the
- 9 property.²⁰

10 While a utility can offer financing opportunities directly to its billpayers, that is not the
11 only way to provide financing mechanisms, as it can be done through partnerships with
12 other organizations and existing financial institutions.

13 **Q: PLEASE DESCRIBE YOUR RECOMMENDATION RELATED TO NON-**
14 **INCENTIVE OPPORTUNITIES.**

15 A: Georgia Power should identify program opportunities for financing and consider financing
16 best practices offered by utilities throughout the country. GPC should consider developing
17 a financing pilot that can be coupled with existing incentives to evaluate the impact on the
18 program participation and to develop the terms for a financing opportunity. The financing
19 pilot could be designed for either residential or small business customers, as they most
20 often face the cost burden when deciding on whether to pursue energy efficiency upgrades.

21 **Q: DO YOU HAVE ANY ADDITIONAL RECOMMENDATIONS RELATED TO**
22 **GPC’S PROPOSED DSM CASE?**

23 A: Yes. Through my review, I identified four opportunities for additional cost-effective
24 savings.

¹⁹How the Small Business Energy Advantage Program Works, Energize CT (last accessed May 1, 2025). Retrieved from <https://energizect.com/energy-assessments/small-business>.

²⁰Improve and Save, Duke Energy (last accessed May 1, 2025). Retrieved from <https://www.duke-energy.com/home/products/improve-and-save>.

- 1 1. As part of the Proposed DSM Case, Georgia Power is proposing to decertify the
2 Commercial Behavioral Program. Georgia Power should also look to move away from
3 the Residential Behavioral Program in an effort to focus on longer-lived savings.
4 Behavior programs have limited lifetime savings, which for GPC is limited to one year.
5 While Behavior programs can be used to market the other energy efficiency
6 opportunities, the savings from behavior programs is not as beneficial as a long-term
7 investment as it is not focused on sustained savings over multiple years like the
8 installation of a heat pump would be.
- 9 2. The Custom Commercial Program is not cost-effective on its own. However, that is
10 confusing, as the individual projects under the program are required to pass cost-
11 effectiveness. GPC's program is designed to provide a standard rebate amount per kWh
12 reduced, regardless of the measure being installed. However, other utilities, such as
13 Duke Energy in North and South Carolina provide rebates on a per kWh basis
14 depending on the installed measure.²¹ Georgia Power should re-evaluate if a shift in
15 incentive design could positively impact the cost-effectiveness of the Custom
16 Commercial Program.
- 17 3. The Residential Demand Response Program should be expanded to include small
18 commercial customers. Expanding this opportunity to those customers will not require
19 additional infrastructure investment as it can leverage the existing technology and
20 platform of the Residential Demand Response Program. Rather this provides additional
21 reliability opportunities and diversifies the demand response program's cycling
22 opportunities.
- 23 4. The Proposed DSM Case should consider offering incentives to customers seeking
24 interconnection if their new construction facilities exceed the 2015 International
25 Energy Conservation Code (IECC). The 2024 IECC was released last year, which

²¹ Smart Saver Custom Incentive Program, Incentive Payment Rate at 1, Duke Energy (last accessed May 1, 2025). Retrieved from <https://www.duke-energy.com/-/media/pdfs/for-your-business/ss-custom-incentive-program.pdf?rev=69bc4cc3e15c4f6a83e34e986e3f337b>.

means that Georgia's buildings are three code iterations behind, which results in missed efficiency opportunities. It is imperative that the new facilities are built to optimize building performance, implement high efficiency equipment, and include technology options to shift load, such as distributed energy resources and energy management systems, when constructed because otherwise it could result in lost opportunities that are not addressed for years or decades. The optimal time is during design, but there is potential during construction and build out. Georgia Power could offer incentives and guidance on design and measures. The guidance and incentives that could be provided to push new buildings to be more efficient could also be expanded to existing buildings receiving significant remodels. Neighboring utility, Duke Energy, offers design assistance for new construction and renovation projects for both small and large facilities.²² There are also several programs nationwide that could provide guidance to develop a similar initiative in Georgia, as part of the DSM portfolio.²³

Q: IS THERE A SPECIFIC INDUSTRY THAT ENERGY EFFICIENCY PROGRAMS IN GEORGIA SHOULD TARGET?

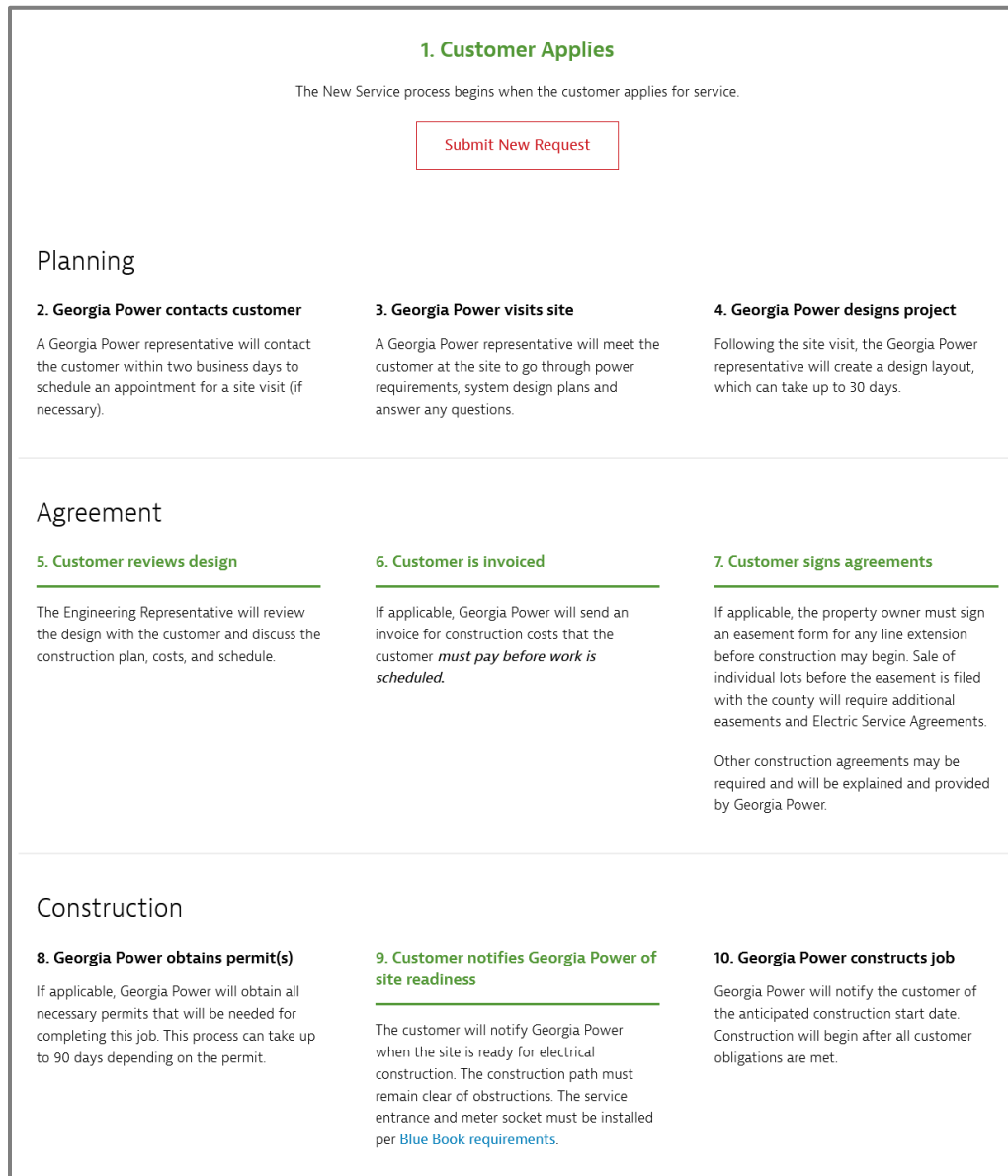
A: Data centers are one of the interconnecting customer types for whom this opportunity would be extremely beneficial. It is important to design efficient new data centers, incorporating features such as hot aisle containment,²⁴ and encourage the deployment of highly efficient technology, such as server, network, and uninterruptible power supply equipment. Creating a pathway specific for data centers and including a new construction component would help Georgia Power market the effort and encourage participation when it meets with customers seeking service and during initial conversations with a new account representative.

²² Energy Design Assistance for Larger Facilities program, Duke Energy (last accessed May 1, 2025). Retrieved from <https://www.duke-energy.com/Business/Products/Design-Assistance/EDA-for-Larger-Facilities>.

²³ C&I New Construction Program Planning & Market Effects/Spillover Study at 55, NMR Group (Apr. 15, 2020), <https://www.nmrgruppinc.com/wp-content/uploads/2021/04/MA19CX01-B-PLANME-Report-FINAL-2020-04-15.pdf>. Note: Best practices from other utility programs are summarized in Appendix A and the relevant section begins on page 55.

²⁴ Hot aisle containment directs hot airflow from the servers upward to an air conditioning return system to increase cooling efficiency, as it allows for reduced temperature setpoints, lower fan speeds, and increases overall cooling capacity.

1 It is unclear if the representatives involved in establishing new accounts are explicitly
2 familiar with efficiency and the DSM program offerings. Therefore, I recommend that
3 Georgia Power either provide training to those new account representatives or include
4 members of the DSM team as part of the design review process.



5 **Figure 6. GPC New Interconnection Process²⁵**

²⁵Establish a New Service Connection, Georgia Power Company (last accessed May 1, 2025), Retrieved from <https://www.georgiapower.com/business/industry-services/start-stop-move/establish-new-connection.html>.

1 There are several touchpoints throughout the new account process, shown in Figure 6
2 above, where DSM expertise could be beneficial, including but not limited to Step 3, the
3 Georgia Power site visit, where system design plans and power requirements are explored;
4 Step 4, when Georgia Power designs a project (while this design layout is related to the
5 electrical components it can also include the power requirements through the equipment
6 and system requirements); and/or Step 5, when the Customer reviews the design.

7 During any of these phases, a DSM technical representative could identify ways to address
8 load and identify the appropriate program offerings to offset costs and increase the
9 efficiency of the facility. GPC should develop a commercial pathway for data centers,
10 similar to that of CenterPoint Energy in Texas, which offers the Data Center Energy
11 Efficiency Program.²⁶ Such a pathway should also be designed to help data centers achieve
12 LEED certification.

13 **Q: DO YOU BELIEVE THAT GPC HAS EXCLUDED COST-EFFECTIVE SAVINGS**
14 **FROM ITS PORTFOLIO?**

15 A: Yes. Since 2007, GPC has commissioned six energy efficiency potential studies. Each of
16 those potential studies has identified cost-effective and achievable industrial energy
17 efficiency and demand savings. The 2024 TEAPot report identified that the industrial
18 sector has energy efficiency opportunities ranging from 331 GWh savings at a 25%
19 incremental incentive level to 931 GWh savings at a 100% incremental incentive level.²⁷
20 This level of savings equates to 1.2% and 3.5% of 2035 sales, respectively. Inclusion of
21 the industrial sector within the Proposed Case can generate more than Georgia Power is
22 trying to achieve in its entire portfolio on an annual basis. It would provide greater savings
23 opportunities, which can be used to offset new load. The 2024 TEAPot identified the vast

²⁶ Data Center Energy Efficiency Program, CenterPoint Energy (last accessed May 1, 2025). Retrieved from <https://www.centerpointenergy.com/en-us/SaveEnergyandMoney/Pages/Data-Center-Energy-Efficiency-Program.aspx?sa=ho&au=bus>.

²⁷ Achievable Energy Efficiency Potential Assessment (Referred to as “2024 TEAPot Report”) at 20, Applied Energy Group, Inc. (Jan. 30, 2024).

majority of cost-effective achievable energy savings in the industrial sector to come from motors, as shown in the Figures below from the 2024 TEAPot report.

Georgia Power indicated that it “does not support the inclusion of an industrial DSM program because Georgia Power’s experience has shown that industrial customers generally adopt DSM and energy efficiency measures on their own...”²⁸ And Witness Goff stated that it is “not cost-effective” for Georgia Power to implement.²⁹

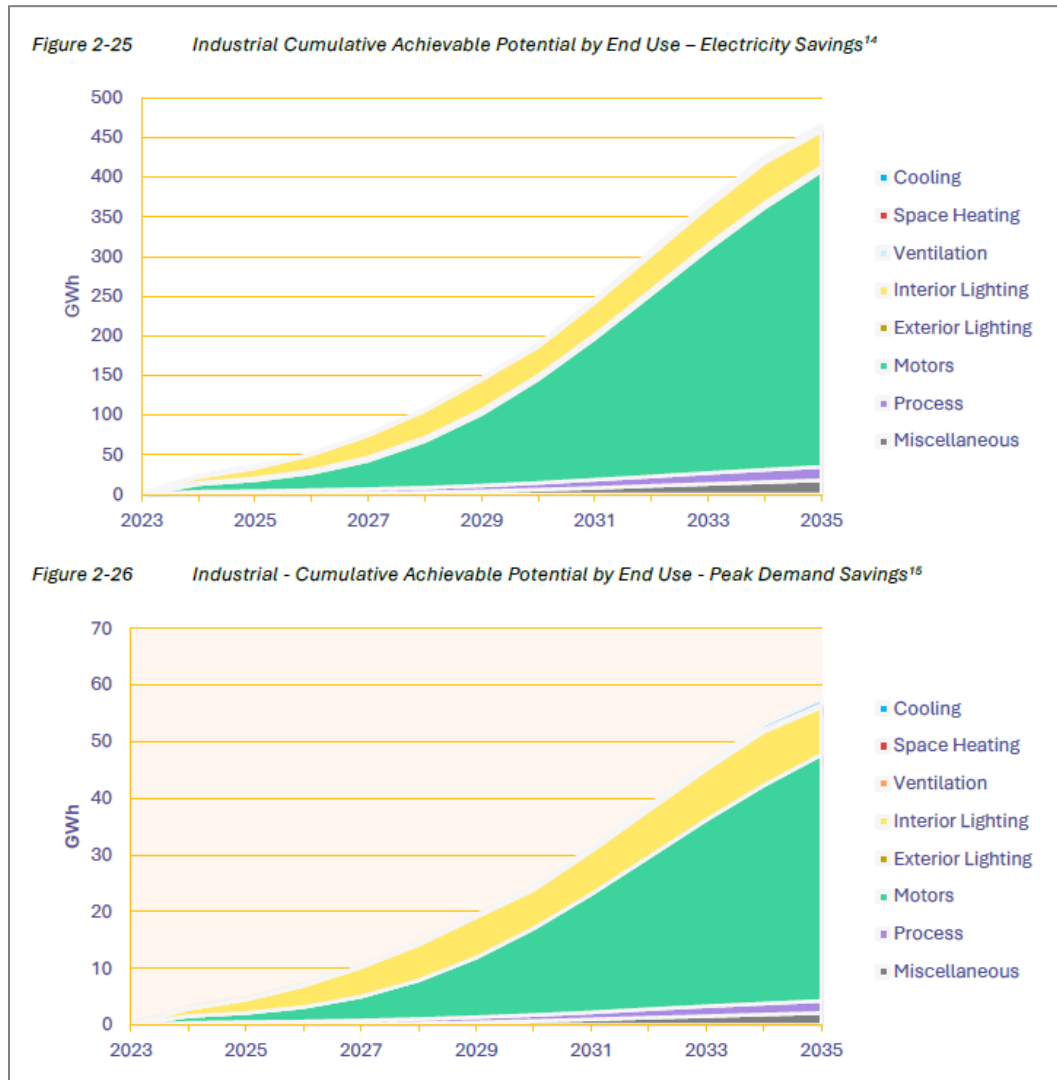


Figure 7. 2024 TEAPot Industrial Cumulative Achievable Potential by End Use

²⁸ 2025 Direct Hr'g Tr. 771:24-27.

²⁹ 2025 Direct Hr'g Tr. 1268:4-5.

1 Not only do the TEAPot reports commissioned by Georgia Power find that there would be
2 cost-effective savings from the industrial sector, but the U.S. Department of Energy's
3 Industrial Assessment Centers program has operated in Georgia for years, conducting
4 audits in small and medium-sized industrial facilities that uncover significant amounts of
5 cost-effective, untapped energy efficiency potential in Georgia, North Florida, and South
6 Carolina. In the thousands of audits performed by the program since the 1980s in Georgia
7 and North Florida, at least 10% energy savings have been identified for every client.³⁰ The
8 program has conducted 886 assessments, identifying an opportunity to save 17.81 trillion
9 British thermal units (Tbtu) of energy, representing \$129.6 million in potential cost
10 savings.³¹ These findings, coupled with Georgia Power's TEAPot reports indicate that
11 there is significant opportunity available for cost-effective savings in the industrial sector,
12 and the Commission should consider requiring Georgia Power to add industrial
13 programming to its DSM portfolio.

14 SECTION V. DSM COST-EFFECTIVENESS

15 **Q: HOW IS THE COST-EFFECTIVENESS OF THE PROPOSED CASE ASSESSED?**

16 A: Georgia Power assessed its Proposed Case by evaluating the cost-effectiveness of the
17 proposed programs based upon multiple cost effectiveness tests. Georgia Power states that
18 as proposed, the design for "increased savings target has led to declining TRC test results
19 and negative RIM test results for several programs. Higher energy efficiency goals require
20 additional resources, including higher incentives, which increase program costs and impact
21 customer rates."³² While these were the primary tests emphasized by Georgia Power, they
22 also provide cost-effectiveness of the Proposed Case based upon the Participant test, the
23 Program Administrator Cost Test (PACT), and Societal test. In all but the RIM test, the

³⁰Industrial Training and Assessment Center (ITAC) Georgia-North Florida-South Carolina, Georgia Tech (last accessed May 1, 2025). Retrieved from <https://iacgeorgia.org/>.

³¹ U.S. Department of Energy Industrial Assessment Center (last accessed May 1, 2025), <https://iac.university/center/GT>.

³² 2025 Direct Hr'g Tr. 777:13-16.

1 Proposed Case exceeded the 1.0 threshold for cost-effectiveness.³³ These results would
2 only improve if the Commission establishes spending at 1% of retail revenues per year.

3 **Q: DO YOU AGREE WITH GEORGIA POWER'S ASSERTION THAT THE**
4 **HIGHER INCENTIVES NEGATIVELY IMPACTED THE TRC TEST?**

5 A: No. The TRC test compares utility program and customer costs to utility resource savings.
6 As designed, the TRC test is neutral as to incentive costs because they are considered on
7 both the cost and benefit sides of the equation. As a result, higher incentives would not
8 negatively impact the TRC test.

9 There are two things that are ultimately driving down the overall cost-effectiveness of the
10 portfolio. First, lighting measures, one of the lowest-cost, high energy savings measures
11 included in portfolios for over a decade are being phased out as a great energy efficiency
12 success story. The shift from low-cost savings measures like lighting, to more
13 comprehensive and deeper measures, like weatherization and heat pumps, result in lower
14 overall cost-effectiveness for Georgia Power's proposed programs, as expected. This is not
15 a negative thing, as it indicates that energy efficiency efforts regarding lighting have
16 transformed the market, and the incentives are no longer necessary. DSM portfolios across
17 the nation have been impacted by this; however, they remain cost-effective.

18 Second, the adoption of higher efficiency codes and application of evaluation findings for
19 realization rates that has occurred since the 2022 IRP limits the amount of incremental
20 energy savings that can be claimed by Georgia Power, which in turn impacts the cost-
21 effectiveness.

22 **Q: DO YOU HAVE CONCERNS ABOUT GEORGIA POWER'S EMPHASIS ON THE**
23 **RIM TEST?**

24 A: Yes, I do. While the RIM test provides insight for decisionmakers on whether *rates* may
25 increase or decrease, there are drawbacks of placing too much emphasis on the test results
26 without further investigation through analysis of real-world bill impacts. I believe Georgia

³³ Georgia Power Company's 2025 Application for the Certification, Decertification, and Amended Demand-Side Management Plan, Program Planner Summary 111-MG0, Appendix E.

1 Power has operated DSM programs with calculated RIM rate impacts for many years
2 during which the utility earned above the rate of return used for ratemaking (e.g., 2014-
3 2019) and, in some years, above the top of the earnings band set by the Commission. The
4 logic of RIM would indicate that these programs, in the absence of Commission-approved
5 rate increase, would lower the utility's return. It's not apparent that this has been the case;
6 this provides some illustration that negative RIM results may be indicative of pressure on
7 rates but are not definitive predictors of actual rate impacts.

8 It is worth noting that the bulk of the cost considered under the RIM test is lost revenue,
9 which equates to customer bill savings under the Participant Test. Unlike program
10 administration and incentive costs (also evaluated in RIM), lost revenue is not a new cost
11 to the system. The estimated increase in rates though is significantly connected with
12 existing fixed costs being recovered from decreased sales and not the result of incentive
13 and administration costs. In fact, as shown by the PACT test, overall system costs decrease
14 with the successful implementation of DSM programs.

15 Also, the RIM test only indicates that rates will go up or down but cannot provide an
16 indication of the order of magnitude. The RIM does not provide for decisionmakers the
17 percent or monetary impact on rates or customer bills. And, critically, rates cannot increase
18 unless the Commission orders them to in a rate case proceeding.

19 Therefore, while the RIM test for GPC's Proposed Plan indicates an increase in rates, the
20 true extent is unclear and it is not known whether the investment in DSM could lower
21 overall utility system costs, which can ultimately lower customer bills. The PACT assesses
22 costs and benefits in the same manner as the RIM test but does not include lost revenues.
23 The PACT shows that excluding lost revenues results in a cost-effective portfolio and
24 results in \$17,958,693 in 2026 of benefits exceeding cost for billpayers.

25 Additionally, the RIM test does not consider how system load growth could be impacting
26 overall system costs.

27 This is a challenge as energy efficiency and demand response opportunities are one of the
28 cheapest options to offset new load growth, especially when compared to traditional supply
29 side resources. Prioritizing the RIM test to assess energy efficiency, something few states

1 do these days, could result in a perverse outcome. It may result in reduced investment in
2 DSM which could in turn increase system costs as load growth is addressed through new
3 capacity builds. To best evaluate the impact of DSM Plans on billpayers, the Commission
4 should consider the results of the other cost-effectiveness tests like PACT that indicates
5 overall lower system costs through acquiring the proposed DSM energy and demand
6 reductions.

7 **SECTION VI. 2025 IRP MODELING AND COST RECOMMENDATIONS**

8 **Q: DID YOU CREATE AN ALTERNATIVE DSM PROPOSAL, BASED ON YOUR**
9 **REVIEW?**

10 A: Yes, the idea was to test an alternative proposal in AURORA to examine the implications
11 for resource mix and system-wide revenue requirements.

12 **Q: PLEASE DETAIL THE LEVEL OF ENERGY SAVINGS AND DEMAND**
13 **REDUCTION ASSUMED IN YOUR ALTERNATIVE DSM PROPOSAL.**

14 A: The level of savings associated with energy efficiency programs under the Alternative
15 DSM Proposal is 749,753 MWh in energy savings.³⁴ By sector, the residential portfolio
16 contributes 239,243 MWh of energy savings and the business portfolio contributes 510,510
17 MWh of energy savings, per year beginning in 2026. The cost of the energy efficiency
18 savings is \$89 million. In addition to the energy efficiency savings, by expanding the
19 residential demand response program to more residential customers as well offering the
20 program to small commercial customers, the program would generate 250 MW of demand
21 response reduction per year at a cost of \$2.85 million. Thus the total portfolio would cost
22 \$91.9 million per year.

³⁴ This forecast is 8,656 MWh higher than that forecasted in GPC's Proposed Case as it utilizes a budget of 1% of 2023 retail sales.

1 **Q. HOW DOES YOUR ALTERNATIVE DSM PROPOSAL COMPARE TO GPC'S**
2 **PROPOSED CASE?**

3 A: The Alternative DSM Plan is projected to cost \$91.9 million per year, producing energy
4 efficiency savings of 749,753 MWh per year and demand response savings of 250 MW
5 annually, producing a similar level of savings as Georgia Power's Proposed DSM Case.
6 However, compared to GPC's Proposed DSM Case, the Alternative DSM Plan is \$467
7 million less while the same a similar level of savings and increased demand response
8 reduction.

9 **Q. PLEASE EXPLAIN HOW YOU ARE ABLE TO FORECAST AND RECOMMEND**
10 **A SIMILAR LEVEL OF ENERGY EFFICIENCY SAVINGS AT A**
11 **SIGNIFICANTLY LOWER COST TO BILLPAYERS?**

12 A: The Alternative DSM Plan relies on a historical cost rate to develop the budget.
13 Specifically, I determined the cost to achieve energy savings on a per kWh basis for GPC's
14 2022 DSM program year, excluding residential lighting costs, for the residential and
15 commercial portfolios. I adjusted the cost per kWh of saved energy to account for inflation
16 using the Consumer Price Index (CPI) from 2022 dollars to 2025 dollars. This level of cost
17 reflects a more reasonable level of incentive costs than that assumed by Georgia Power's
18 Proposed Case.

19 As the goal of the Proposed Case was to achieve 0.75% energy savings compared to retail
20 sales, I used Georgia Power's proposed level of savings. Given the cost difference between
21 the residential and commercial sectors, I multiplied the cost per kWh for each sector by the
22 associated forecasted energy savings to determine the cost for the energy efficiency
23 programs.

24 To determine the demand reduction program costs, I calculated the cost rate for the 2022
25 residential demand response program, adjusted for inflation, and calculated the cost to
26 achieve 250 MW of demand response reduction. The total cost was then the sum of the
27 energy efficiency and demand response costs.

Q. DOES THAT ANALYSIS SUPPORT YOUR RECOMMENDATION FOR A REDUCED BUDGET FOR THE PROPOSED CASE?

A: It does, in addition to the reasons in the programmatic recommendations in prior Sections of this testimony, to achieve the 0.75% energy savings for GPC, my recommendation that the cost should be equivalent to 1% of the 2023 retail sales is supported by the historical review I conducted for the Alternative DSM Proposal. This is in line with the Peer Utilities discussed above and across the nation in terms of the cost of savings relative to retail revenues and level of savings relative to retail sales. As shown in the table below, the Alternative DSM Plan achieves lower savings than the Duke Energy utilities, but at a lower cost compared to retail sales. The level of cost and savings for the Alternative DSM Plan is aligned with GPC's 2023 energy efficiency results when considering economics of scale for the programs addressing more customers.

	Georgia Power Proposed Case (2026)	Alternative DSM Plan	2023 Annual Energy Efficiency Results					
			Georgia Power	Duke Energy Carolinas NC	Duke Energy Progress NC	Duke Energy Carolinas SC	Duke Energy Progress SC	Dominion Energy SC
Savings as a Percentage of Retail Sales	0.88%	0.75%	0.33%	1.01%	0.95%	0.99%	1.01%	0.52%
Spending as a Percentage of Retail Revenue	6.07%	1.00%	0.57%	1.29%	1.45%	1.24%	1.59%	1.10%

Table 4. Comparison of Savings and Spending on Energy Efficiency among GPC's Peers and with Alternative DSM Plan

Q: HOW DID YOU TEST THE ALTERNATIVE DSM PLAN IN AURORA?

A: I provided the Alternative DSM Plan to Witness Hotaling who incorporated it in her AURORA modeling. In the course of Witness Hotaling's testing the plan in AURORA, we learned that the AURORA inputs were inconsistent with Georgia Power's Proposed Case.

Q: WAS THIS SURPRISING?

A: Yes.

Q: WHY?

A: As stated in Georgia Power's IRP filing:

1 Georgia Power "...treats DSM as a priority resource. In fact, the first
2 step in the Company's IRP process is to reduce the Company's load
3 and energy forecasts by the Proposed Case's energy and demand
4 impacts, prior to developing supply-side alternatives."³⁵

5 But, Georgia Power's workpapers for the DSM "forecast adjustments" to develop the load
6 forecasts used numbers that did not represent the Proposed Case's energy and demand
7 savings.³⁶ In fact, the energy and demand savings in the workpaper are significantly lower
8 than the Proposed Case. This apparent undercounting of DSM savings could have far-
9 reaching implications, beyond the scope of this testimony.

10 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

11 **A:** Yes, it does.

[Remainder of this page intentionally blank.]

³⁵ 2025 IRP Main Document at 51. The Proposed Case's energy and demand impacts can be found at Tech. Appx. 1, DSM Program Documentation in the "2025 IRP DSM Case Summary Data" spreadsheets. *See also* 2025 Direct Hr'g Tr. 767:18-22.

³⁶ Georgia Power response to JKA-1-1(b) (PD) and JKA-1-1 Attachment C (PD and TS).

**STATE OF GEORGIA
BEFORE THE
PUBLIC SERVICE COMMISSION**

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

EXHIBIT SLS-1

PROFESSIONAL SUMMARY

Stacy Sherwood brings over 15 years of experience in the energy industry, specializing in energy efficiency (EE), demand response (DR), automated metering infrastructure (AMI), cost recovery, and renewable energy. Stacy has testified or provided comments before the public service commissions of Kentucky, Louisiana, Maryland, and Missouri, the Kansas Corporation Commission, the Virginia State Corporation Commission, and the public utilities commissions of Maine, Pennsylvania and Rhode Island on AMI, EE, protections for cryptocurrency related load growth, and reasonableness of revenue increases. Throughout her career, Stacy has evaluated various electric and natural gas EE and DR plans; potential studies; evaluation, measurement, and verification reports; and riders for cost recovery. In particular, she has specialized in the design of low-income EE programs in Arkansas, Maryland, and Pennsylvania. Stacy has also testified in 15 cases related to the reasonableness of revenue requirements in Maine, Pennsylvania, and Rhode Island.

Since joining EFG in October 2021, Stacy has immersed herself in Connecticut's energy goals and policy and has established relationships with all stakeholders relevant to Connecticut's energy efficiency and demand response programs. She serves as the team lead and senior technical consultant on behalf of the Connecticut Energy Efficiency Board, which provides oversight of the state's energy efficiency programs. Through her work in Connecticut, Kentucky, and Maryland, she has evaluated the impacts of EE programs and other policies as it relates to environmental justice. More recently, she has begun providing support to jurisdictions on establishing a cost-benefit framework to evaluate distributed energy resources (DERs) and identifying safeguards related to large loads, such as data centers and cryptomining.

EXPERIENCE

2024-Present: Principal, Energy Futures Group, Hinesburg, VT

2021-2023: Managing Consultant, Energy Futures Group, Hinesburg, VT

2015-2021: Senior Analyst, Exeter Associates, Inc., Columbia, MD

2013-2015: Assistant Director of Energy, Analysis, and Planning Division, Maryland Public Service Commission, Baltimore, MD

2011-2013: Regulatory Economist II, Maryland Public Service Commission, Baltimore, MD

2009-2011: Regulatory Economist I, Maryland Public Service Commission, Baltimore, MD

EDUCATION

B.A., Business Administration, Economics, Accounting/Economics, McDaniel College, 2009

SELECTED PROJECTS

- **Connecticut Energy Efficiency Board.** Lead Technical Consultant on the oversight of the state's electric and gas residential energy efficiency programs. Work closely with the state's utilities to develop, implement, and evaluate cost-effective program designs and goals for the Three-Year Conservation and Load Management Plan. (2021-Present)
- **Natural Resources Defense Council.** Filed testimony before the Kansas Corporation Commission to support the adoption of energy efficiency programs for the first time in the Evergy service territory. Worked with parties to negotiate program design and implementation, as well as the performance incentive mechanism. (2021-2022)
- **Louisiana Public Service Commission.** Filed testimonies evaluating the reasonableness of automated metering infrastructure implementation plans by Concordia Electric Cooperative, Inc., Southwest Louisiana Electric Membership Corporation, and Point Coupee Electric Membership Corporation. (2020-2021)
- **Pennsylvania Office of Consumer Advocate.** Reviewed and commented on potential studies utilized to develop energy efficiency and demand response targets for Phase III and IV of the Act 129 Energy Efficiency and Conservation (EE&C) Program. Provided written testimony on utility EE&C five-year plans. (2015-2021, 2023-2024)
- **Arkansas Attorney General's Consumer Utility Rate Advocacy Division.** Drafted a dedicated limited income EE program strawman implemented on a pilot basis by the electric and natural gas utilities. (2018-2020)
- **Arkansas Attorney General's Consumer Utility Rate Advocacy Division.** Participated in Parties Working Collaboratively (PWC) group regarding the electric

and natural gas EE programs. Provided comments on three-year plans, annual progress reports, and evaluation, measurement, and verification reports. (2017-2021)

- **Maryland Public Service Commission Staff.** *Developed templates and directed work groups related to the implementation of the electric and natural gas EmPOWER Maryland EE and DR programs. Evaluated the semi-annual reports and three-year plans filed by the utilities and submitted comments regarding plan recommendations before the Maryland Public Service Commission. (2009-2015)*

EXPERT TESTIMONY

Before the Pennsylvania Public Utilities Commission, Docket No. M-2024-3048418, *Petition of UGI Utilities, Inc. – Gas Division for Approval of its Phase II Energy Efficiency and Conservation Plan*, February 2025, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Public Service Commission of Wisconsin, Case No. 6630-CE-317, *Application of Wisconsin Electric Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the South Oak Creek Combustion Turbine Project in the City of Oak Creek, Milwaukee County, Wisconsin*, February 2025, on behalf of Clean Wisconsin. Testified on increased need for energy efficiency in the Wisconsin Electric Power Company service territory. (Ongoing).

Before the Public Service Commission of Wisconsin, Case No. 6630-CE-316, *Application of Wisconsin Electric Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Paris Reciprocating Internal Combustion Engines Project, Consisting of Seven Natural Gas-Fired Reciprocating Internal Combustion Engines Generating up to 128 MW Total at the Lakeshore Capacity Improvement Project Regulator Station in the Town of Paris, Kenosha County, Wisconsin*, December 2024, on behalf of Clean Wisconsin. Testified on increased need for energy efficiency in the Wisconsin Electric Power Company service territory. (Ongoing).

Before the Kentucky Public Service Commission, Case No. 2024-00115, *In the matter of Electronic Application of Kentucky Power Company For: (1) Approval to Expand its Targeted Energy Efficiency Program; (2) Approval of a Home Energy Improvement Program and a Commercial Energy Solutions Program; (3) Authority to Recover Costs and Net Lost Revenues, and to Receive Incentives Associated with the Implementation of its Demand Side Management/Energy Efficiency Programs; (4) Approval of Revised Tariff D.S.M.C.; (5) Acceptance of its Annual DSM Status Report; and (6) All Other Required Approvals and Relief*, May 2024, on behalf of Mountain Association, Appalachian Citizens' Law

Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society. Testified on the reasonableness of the proposed demand side management programs and cost recovery mechanism.

Before the Public Service of South Carolina Docket No. 2023-388-E, *In the matter of Application of Duke Energy Carolinas, LLC for Authority to Adjust and Increase its Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order*, April 2024, on behalf of the South Carolina Conservation League, Southern Alliance for Clean Energy, and Vote Solar. Testified regarding impact of rate increase on customer energy burden and the benefits of energy efficiency to offset rate impact.

Before the Commonwealth of Virginia State Corporation Commission Case No. PUR-2023-000169, *Petition of Appalachian Power Company for approval to continue a rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to § 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, March 2024, on behalf of the Appalachian Voices. Testified regarding reasonableness of proposed Plan.

Before the Public Service Commission of the State of Missouri, File No. EO-2023-0136, *In the matter of Union Electric Company d/b/a Ameren Missouri's 4th Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA*, March 2024, on behalf of the National Resources Defense Council. Testified regarding reasonableness of proposed Plan.

Before the Pennsylvania Public Utilities Commission, Docket No. M-2023-3043230, *Petition of UGI Utilities, Inc. – Electric Division for Approval of its Energy Efficiency and Conservation Plan*, September 2023, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Commonwealth of Kentucky before the Public Service Commission, Case No. 2022-00424, *In the Matter of Electronic Tariff Filing of Kentucky Power Company for Approval of a Special Contract Under Its Economic Development Rider and Demand Response Service Tariffs with Cyber Innovation Group, LLC.*, on behalf of the Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council. Testified on the merits of providing an economic development discount rate to a proposed crypto mining facility as it relates to ratepayer risk.

Before the Commonwealth of Kentucky before the Public Service Commission, Case No. 2022-00387, *In the Matter of Electronic Tariff Filing of Kentucky Power Company for Approval of a Special Contract with Ebon International, LLC.*, on behalf of the Mountain Association, Kentuckians for the Commonwealth,

Appalachian Citizens' Law Center, Sierra Club, and Kentucky Resources Council, Inc. Testified on the merits of providing an economic development discount rate to a proposed crypto mining facility as it relates to ratepayer risk.

Before the Commonwealth of Kentucky before the Public Service Commission, Case No. 2022-00037, *In the Matter of Electronic Tariff Filing of Kentucky Utilities Company for Approval of an Economic Development Rider Special Contract with Bitiki-KY, LLC.*, on behalf of Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Kentucky Resources. Testified on the merits of providing an economic development discount rate to a proposed crypto mining facility as it relates to ratepayer risk.

Before the State of Maine Public Utilities Commission, Docket No. 2022-0025 *Versant Power Request for Approval of a Distribution Rate Change – 307*, December 2022, for Maine Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

Before the Kansas Corporation Commission, Docket No. 22-EKME-254-TAR *In the Matter of the Application of Evergy Kansas Metro, Inc., Evergy Kansas South, Inc. and Evergy Kansas Central, Inc. for Approval of its Demand-Side Management Portfolio Pursuant to the Kansas Energy Efficiency Investment Act ("KEEIA")*, K.S.A. 66-1283, June 2022, for Natural Resources Defense Council. Testified regarding reasonableness of the proposed Plan and its compliance with the KEEIA Act.

Before the Louisiana Public Service Commission, Docket No. U-35877 *Pointe Coupee Electric Membership Corporation Application to Acquire and Install an Automated Metering System and Request for Cost Recovery and Related Relief*, February 2021, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020818, *Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase IV Plan*, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020830, *Petition of PECO Energy Company for Approval of its Energy Efficiency and Conservation Phase IV Plan*, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan

and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2020-3020824, *Petition of PPL Electric Utilities for Approval of its Energy Efficiency and Conservation Phase IV Plan*, January 2021, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Louisiana Public Service Commission, Docket No. U-35707 Southwest Louisiana Electric Membership Corporation *Application for Approval to Acquire and Install an Automated Metering System and Request for Cost Recovery and Related Relief*, December 2020, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3020919 *Pennsylvania Public Utility Commission v. Audubon Water Company*, November 2020, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3020256 *Pennsylvania Public Utility Commission v. City of Bethlehem – Water Department*, November 2020, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Louisiana Public Service Commission, Docket No. U-35456 Concordia Electric Cooperative Inc. *Application for Certification of a Replacement Advanced Metering System and Approval of Related Financing*, November 2020, for the Louisiana Public Service Commission Staff. Testified regarding the implementation of automated metering infrastructure to replace current meters. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2020-3019612 *Pennsylvania Public Utility Commission v. Reynolds Disposal Company*, October 2020, for the Pennsylvania Office of Consumer Advocate. Participated in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3010955 *Pennsylvania Public Utility Commission v. City of Lancaster – Sewer Fund*,

October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008208
Pennsylvania Public Utility Commission v. Wellsboro Electric Company, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008209
Pennsylvania Public Utility Commission v. Valley Energy, Inc., October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008212,
Pennsylvania Public Utility Commission v. Citizens' Electric Company of Lewisburg, PA, October 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3009559,
Pennsylvania Public Utility Commission v. Eaton Sewer & Water Company, Inc. – Wastewater Division, August 2019, for the Pennsylvania Office of Consumer Advocate. Participate in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3009567,
Pennsylvania Public Utility Commission v. Eaton Sewer & Water Company, Inc. – Water Division, August 2019, for the Pennsylvania Office of Consumer Advocate. Participate in mediation regarding reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008947,
Pennsylvania Public Utility Commission v. Community Utilities of Pennsylvania Inc. Water Division, July 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3008948,
Pennsylvania Public Utility Commission v. Community Utilities of Pennsylvania Inc. Wastewater Division, July 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2019-3006904,
Pennsylvania Public Utility Commission v. The Newtown Artesian Water

Company (Supplement No. 136 to Tariff Water – Pa. P.U.C. No. 9), March 2019, for the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the overall revenue increase. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3006814, *Pennsylvania Public Utility Commission v. UGI Utilities, Inc – Gas Division (Utility Code 123100, Filed Tariff Gas- Pa. P.U.C. Nos. 7 and 7S)*, January 2019, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of its proposed consolidated natural gas energy efficiency plan. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2018-3004144, *Petition of UGI Utilities, Inc. – Electric Division for Approval of its Energy Efficiency and Conservation Plan*, August 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3001307, *Pennsylvania Public Utility Commission v. Hidden Valley Utility Services, L.P. – Wastewater (General Rate Increase Filed Pursuant to 66 PS. CS 1308, Including Answers to 52 PA. Code 53.52)*, April 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. R-2018-3001306, *Pennsylvania Public Utility Commission v. Hidden Valley Utility Services, L.P. – Water (General Rate Increase Filed Pursuant to 66 PS. CS 1308, Including Answers to 52 PA. Code 53.52)*, April 2018, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the reasonableness of the overall revenue increase.

Before the Pennsylvania Public Utilities Commission, Docket No. P-2015-2497267, *Petition of Duquesne Light Company for Approval of its Smart Meter Procurement and Installation Plan*, February 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding the inclusion of additional costs related to the Plan's implementation.

Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2477174, *Petition of UGI Utilities, Inc. – Electric Division for Approval of Phase II of its Energy Efficiency and Conservation Plan*, February 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of proposed Plan. (Case settled prior to cross-examination.)

Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2515642, *Petition of PPL Electric Utilities for Approval of its Energy Efficiency and Conservation Phase II Plan*, January 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)


Before the Pennsylvania Public Utilities Commission, Docket No. M-2015-2515375, *Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Phase II Plan*, January 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testified regarding reasonableness of the proposed Plan and its compliance with Pennsylvania Act 129. (Case settled prior to cross-examination.)

Before the Public Utilities Commission of Rhode Island, Docket No. 4595, *Newport Water Division – Rate Application to Collect Additional Revenues of \$1,304,595 for a Total Cost of Service of \$20,151,440*, December 2015, on behalf of the Division of Public Utilities and Carriers. Testified regarding reasonableness of the overall rate revenue increase.

Before the Maryland Public Service Commission, Case No. 9311, *In the Matter of the Application of Potomac Electric Power Company for an Increase in its Retail Rates For the Distribution of Electric Energy*, April 2013, on behalf of the Maryland Public Service Commission Staff. Testified regarding the inclusion of advanced metering infrastructure meters and energy advisor and engineer positions in rates.

CERTIFICATE OF SERVICE

I certify that the foregoing **Direct Testimony of Stacy L. Sherwood on behalf of Georgia Interfaith Power & Light and Southface Energy Institute** was filed with the Public Service Commission in Dockets No. 56002 and 56003 by electronic delivery on the 2nd of May, 2025. An electronic copy of the same was served upon all parties listed below by electronic mail as follows:



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