SC | SMITH CONERLY LLP

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Carrollton, Georgia 30117
phone: 770-834-1160
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CHARLES S. CONERLY
cconerly@smithconerly.com

May 7, 2025

VIA ALTERNATIVE ELECTRONIC FILING
and FEDERAL EXPRESS
Sallie Tanner, Executive Secretary
GEORGIA PUBLIC SERVICE COMMISSION
244 Washington Street, SW
Atlanta, Georgia 30334-5701
stanner@pscv.ga.gov
404-656-4540

Re: City of Cartersville v. Georgia Power Company
Docket No.: 55973

Dear Ms. Tanner:

Please find enclosed for filing the City of Cartersville's Request for Issuance of Subpoenas for four(4) witnesses listed below to appear before the Georgia Public Service Commission. Currently, a hearing is scheduled before the Commission in the above-styled docket for August 4, 2025.

I request that a Subpoena to Testify and Produce Documents or Things be issued to the following:

Corporate Subpoenas:
Hines Busch Cartersville, LLC
Allied Tube & Conduit Corp.

Individual Subpoenas:
Mr. Satya B. Madivala
Mr. Steve London

Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

SMITH CONERLY LLP

Karen Earnest

Karen Earnest
Assistant to Charles S. Conerly

/ke
Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

CITY OF CARTERSVILLE	)	
	)	
Petitioner,	)	
	)	
v.	)	Docket No. 55973
	)	
GEORGIA POWER COMPANY	)	
	)	
Respondent.	)	

CITY OF CARTERSVILLE'S REQUEST FOR ISSUANCE OF SUBPOENA

Pursuant to the Notice of Hearing and Scheduling Order in this matter and O.C.G.A. § 50-13-13(a)(6), City of Cartersville hereby requests that the Hearing Officer sign the attached subpoenas and return to the undersigned for service.

Respectfully submitted, this 7th of May, 2025.

SMITH CONERLY LLP

/s/ Charles S. Conerly
Charles S. Conerly
Georgia Bar No.: 180720
cconerly@smithconerly.com

ATTORNEYS FOR CITY OF CARTERSVILLE

402 Newnan Street
Carrollton, Georgia 30117
(770) 834-1160 (telephone)
(770) 834-1190 (facsimile)

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

CITY OF CARTERSVILLE	)	
	)	
Petitioner,	)	
	)	
v.	)	Docket No. 55973
	)	
GEORGIA POWER COMPANY	)	
	)	
Respondent.	)	

CERTIFICATE OF SERVICE

This is to certify that I have this date served a true and correct copy of **CITY OF CARTERSVILLE'S REQUEST FOR ISSUANCE OF SUBPOENA** on the following individuals by Alternative Electronic Filing and overnight delivery as follows:

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.ga.gov

Nancy Gibson
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
ngibson@psc.state.ga.us

Steven J. Hewitson
Allison W. Pryor
Matthew C. Daigle
TROUTMAN PEPPER HAMILTON SANDERS LLP
Bank of America Plaza
600 Peachtree Street, N.E. Suite 3600
Atlanta, Georgia 30308-2216
steven.hewitson@troutman.com
allison.pryor@troutman.com
matt.daigle@troutman.com

This 7th of May, 2025.

SMITH CONERLY LLP

/s/ Charles S. Conerly
Charles S. Conerly
Georgia Bar No.: 180720
cconerly@smithconerly.com

ATTORNEYS FOR CITY OF CARTERSVILLE

402 Newnan Street
Carrollton, Georgia 30117
(770) 834-1160 (telephone)
(770) 834-1190 (facsimile)

COMMISSIONERS:

TRICIA PRIDEMORE, CHAIRMAN
TIM G. ECHOLS, VICE-CHAIRMAN
FITZ JOHNSON
JASON SHAW
LAUREN "BUBBA" McDONALD, JR.

REECE MCALISTER
EXECUTIVE DIRECTOR

SALLIE TANNER
EXECUTIVE SECRETARY

Georgia Public Service Commission

(404} 656-4501
(800} 282-5813

244 WASHINGTON STREET, S.W.
ATLANTA GEORGIA 30334-5701

FAX: (404} 656-2341
www.psc.state.ga.us

SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS

GEORGIA – FULTON COUNTY
DOCKET NO. 55973

CITY OF CARTERSVILLE V. GEORGIA POWER COMPANY

TO: HINES BUSCH CARTERSVILLE, LLC

GREETINGS:

You are required to appear at the Hearing Room of the Georgia Public Service Commission, First Floor, 244 Washington Street S.W., Atlanta, Georgia 30334 on the 4th day of August 2025, at 10:00 a.m., and continuing as necessary to testify at the hearing in the above entitled action pending before the Georgia Public Service Commission and to bring with you:

- See Exhibit "A" attached

As a corporate entity, you should designate one or more persons to testify regarding the authenticity of each document and the facts relevant to its creation.

HEREIN FAIL NOT, UNDER PENALTY OF LAW, BY ORDER OF THE GEORGIA PUBLIC SERVICE COMMISSION, this _____ day of _____ , 2025.

_____
Nancy Gibson (Hearing Officer)
GEORGIA PUBLIC SERVICE COMMISSION

RETURN OF SERVICE

Received this subpoena at _____, 2025 and on _____, 2025, at _____served it on the within named_____ by delivering a copy to him/her and tendering to him/her the fee for attendance and mileage as required by law[2]

_____ _____
By: Date:

Fees:

Service _____ $ _____ Mileage _____ $ _____
Total _____ $ _____

I certify that the foregoing is true and correct. Executed on , 2025.

_____

[2] For a subpoena issued on behalf of a party other than the Georgia Public Service Commission to be valid, service and mileage fees must be tendered to the witness upon service of the subpoena (O.C.G.A. § 24-10-24).

EXHIBIT A TO HINES BUSCH CARTERSVILLE, LLC

Definitions and Instructions

As used herein, the term "You" (including any derivatives thereof) means Hines Busch Cartersville, LLC, as well as any of its agents, officers, representatives, departments, divisions, or affiliated organizations.

The term "Atkore" refers to Allied Tube & Conduit Corp.

The term "City" refers to City of Cartersville, Georgia.

The term "GPC" refers to Georgia Power Company.

The term "Property" refers to premises located at 1181 Cassville Road, Cartersville, Georgia.

The term "Building" refers to the building previously developed for office and warehouse use on the Property.

The term "Project" refers to the proposed project to convert the Building into a manufacturing facility.

The term "concerning" means, without limitation, relating to, regarding, referring to, reflecting, consisting of, evidencing, or constituting.

When a document is requested herein, the request includes any writings, emails, photographs, and any document maintained in a graphic, electronic, or other medium of any kind or nature.

Requests

1. Any and all documentation concerning communications between You and Atkore involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.
2. Any and all documentation concerning communications between You and the City involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric

power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.

3. Any and all documentation concerning communications between You and GPC involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.
4. Any and all other documents related to the actual, planned, or proposed electric power service to the Property, Building, or Project.

COMMISSIONERS:

TRICIA PRIDEMORE, CHAIRMAN
TIM G. ECHOLS, VICE-CHAIRMAN
FITZ JOHNSON
JASON SHAW
LAUREN "BUBBA" McDONALD, JR.

REECE MCALISTER
EXECUTIVE DIRECTOR

SALLIE TANNER
EXECUTIVE SECRETARY

Georgia Public Service Commission

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SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS

GEORGIA – FULTON COUNTY
DOCKET NO. 55973

CITY OF CARTERSVILLE V. GEORGIA POWER COMPANY

TO: ALLIED TUBE & CONDUIT CORP.

GREETINGS:

You are required to appear at the Hearing Room of the Georgia Public Service Commission, First Floor, 244 Washington Street S.W., Atlanta, Georgia 30334 on the 4th day of August 2025, at 10:00 a.m., and continuing as necessary to testify at the hearing in the above entitled action pending before the Georgia Public Service Commission and to bring with you:

- See Exhibit "A" attached

As a corporate entity, you should designate one or more persons to testify regarding the authenticity of each document and the facts relevant to its creation.

HEREIN FAIL NOT, UNDER PENALTY OF LAW, BY ORDER OF THE GEORGIA PUBLIC SERVICE COMMISSION, this _____ day of _____ , 2025.

_____
Nancy Gibson (Hearing Officer)
GEORGIA PUBLIC SERVICE COMMISSION

RETURN OF SERVICE

Received this subpoena at _____, 2025 and on _____, 2025, at _____served it on the within named_____ by delivering a copy to him/her and tendering to him/her the fee for attendance and mileage as required by law[2]

_____ _____
By: Date:

Fees:

Service _____ $ _____ Mileage _____ $ _____
Total _____ $ _____

I certify that the foregoing is true and correct. Executed on , 2025.

_____

[2] For a subpoena issued on behalf of a party other than the Georgia Public Service Commission to be valid, service and mileage fees must be tendered to the witness upon service of the subpoena (O.C.G.A. § 24-10-24).

EXHIBIT A TO ALLIED TUBE & CONDUIT CORP.

Definitions and Instructions

As used herein, the term "You" (including any derivatives thereof) means Allied Tube & Conduit Corp. as well as any of its agents, officers, representatives, departments, divisions, or affiliated organizations.

The term "Hines" refers to Hines Busch Cartersville, LLC.

The term "City" refers to City of Cartersville, Georgia.

The term "GPC" refers to Georgia Power Company.

The term "Property" refers to premises located at 1181 Cassville Road, Cartersville, Georgia.

The term "Building" refers to the building previously developed for office and warehouse use on the Property.

The term "Project" refers to the proposed project to convert the Building into a manufacturing facility.

The term "concerning" means, without limitation, relating to, regarding, referring to, reflecting, consisting of, evidencing, or constituting.

When a document is requested herein, the request includes any writings, emails, photographs, and any document maintained in a graphic, electronic, or other medium of any kind or nature.

Requests

1. Any and all documentation concerning communications between You and Hines involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.
2. Any and all documentation concerning communications between You and the City involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric

power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.

3. Any and all documentation concerning communications between You and GPC involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.
4. Any and all other documents related to the actual, planned, or proposed electric power service to the Property, Building, or Project.

COMMISSIONERS:

TRICIA PRIDEMORE, CHAIRMAN
TIM G. ECHOLS, VICE-CHAIRMAN
FITZ JOHNSON
JASON SHAW
LAUREN "BUBBA" McDONALD, JR.

REECE MCALISTER
EXECUTIVE DIRECTOR

SALLIE TANNER
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SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS

GEORGIA – FULTON COUNTY
DOCKET NO. 55973

CITY OF CARTERSVILLE V. GEORGIA POWER COMPANY

TO: Mr. Steve London

GREETINGS:

You are required to appear at the Hearing Room of the Georgia Public Service Commission, First Floor, 244 Washington Street S.W., Atlanta, Georgia 30334 on the 4th day of August 2025, at 10:00 a.m., and continuing as necessary to testify at the hearing in the above entitled action pending before the Georgia Public Service Commission and to bring with you:

- See Exhibit "A" attached

HEREIN FAIL NOT, UNDER PENALTY OF LAW, BY ORDER OF THE GEORGIA PUBLIC SERVICE COMMISSION, this _____ day of _____ , 2025.

_____
Nancy Gibson (Hearing Officer)
GEORGIA PUBLIC SERVICE COMMISSION

RETURN OF SERVICE

Received this subpoena at _____, 2025 and on _____, 2025, at _____served it on the within named_____ by delivering a copy to him/her and tendering to him/her the fee for attendance and mileage as required by law[2]

_____ _____
By: Date:

Fees:

Service _____ $ _____ Mileage _____ $ _____
Total _____ $ _____

I certify that the foregoing is true and correct. Executed on , 2025.

_____

[2] For a subpoena issued on behalf of a party other than the Georgia Public Service Commission to be valid, service and mileage fees must be tendered to the witness upon service of the subpoena (O.C.G.A. § 24-10-24).

EXHIBIT A TO STEVE LONDON

Definitions and Instructions

The term "Atkore" refers to Allied Tube & Conduit Corp.

The term "Hines" refers to Hines Busch Cartersville, LLC.

The term "City" refers to City of Cartersville, Georgia.

The term "GPC" refers to Georgia Power Company.

The term "Property" refers to premises located at 1181 Cassville Road, Cartersville, Georgia.

The term "Building" refers to the building previously developed for office and warehouse use on the Property.

The term "Project" refers to the proposed project to convert the Building into a manufacturing facility.

The term "concerning" means, without limitation, relating to, regarding, referring to, reflecting, consisting of, evidencing, or constituting.

When a document is requested herein, the request includes any writings, emails, photographs, and any document maintained in a graphic, electronic, or other medium of any kind or nature.

Requests

1. Any and all documentation concerning communications between Atkore and Hines involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.
2. Any and all documentation concerning communications between Atkore and the City involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.

3. Any and all documentation concerning communications between Atkore and GPC involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.
4. Any and all other documents related to the actual, planned, or proposed electric power service to the Property, Building, or Project.

COMMISSIONERS:

TRICIA PRIDEMORE, CHAIRMAN
TIM G. ECHOLS, VICE-CHAIRMAN
FITZ JOHNSON
JASON SHAW
LAUREN "BUBBA" McDONALD, JR.

REECE MCALISTER
EXECUTIVE DIRECTOR

SALLIE TANNER
EXECUTIVE SECRETARY

Georgia Public Service Commission

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SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS

GEORGIA – FULTON COUNTY
DOCKET NO. 55973

CITY OF CARTERSVILLE V. GEORGIA POWER COMPANY

TO: Mr. Satya B. Madivala

GREETINGS:

You are required to appear at the Hearing Room of the Georgia Public Service Commission, First Floor, 244 Washington Street S.W., Atlanta, Georgia 30334 on the 4th day of August 2025, at 10:00 a.m., and continuing as necessary to testify at the hearing in the above entitled action pending before the Georgia Public Service Commission and to bring with you:

- See Exhibit "A" attached

HEREIN FAIL NOT, UNDER PENALTY OF LAW, BY ORDER OF THE GEORGIA PUBLIC SERVICE COMMISSION, this _____ day of _____ , 2025.

_____
Nancy Gibson (Hearing Officer)
GEORGIA PUBLIC SERVICE COMMISSION

RETURN OF SERVICE

Received this subpoena at _____, 2025 and on _____, 2025, at _____served it on the within named_____ by delivering a copy to him/her and tendering to him/her the fee for attendance and mileage as required by law[2]

_____ _____
By: Date:

Fees:

Service _____ $ _____ Mileage _____ $ _____
Total _____ $ _____

I certify that the foregoing is true and correct. Executed on , 2025.

_____

[2] For a subpoena issued on behalf of a party other than the Georgia Public Service Commission to be valid, service and mileage fees must be tendered to the witness upon service of the subpoena (O.C.G.A. § 24-10-24).

EXHIBIT A TO SATYA B. MADIVALA

Definitions and Instructions

The term "Hines" refers to Hines Busch Cartersville, LLC.

The term "Atkore" refers to Allied Tube & Conduit Corp.

The term "City" refers to City of Cartersville, Georgia.

The term "GPC" refers to Georgia Power Company.

The term "Property" refers to premises located at 1181 Cassville Road, Cartersville, Georgia.

The term "Building" refers to the building previously developed for office and warehouse use on the Property.

The term "Project" refers to the proposed project to convert the Building into a manufacturing facility.

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When a document is requested herein, the request includes any writings, emails, photographs, and any document maintained in a graphic, electronic, or other medium of any kind or nature.

Requests

1. Any and all documentation concerning communications between Hines and Atkore involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.
2. Any and all documentation concerning communications between Hines and the City involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.

3. Any and all documentation concerning communications between Hines and GPC involving proposals or requests for service of electric power to the Project, proposals or requests for service of electric power to the Property, the right of GPC or any other electric utility to provide electric power service to the Property, and the actual, planned, or proposed electric power service to the Property, Building, or Project.
4. Any and all other documents related to the actual, planned, or proposed electric power service to the Property, Building, or Project.