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May 12, 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:

In accordance with the Notice of Hearing and Scheduling Order in the above-referenced matter, the City of Cartersville hereby identifies the individuals below as its direct testimony witnesses. The City of Cartersville reserves the right to submit rebuttal testimony from these or other witnesses.

Mr. Steve London	(Allied Tube and Conduit Corporation)
Mr. Satya B. Madivala	(Hines Interests Limited Partnership)
Mr. Freddy L. Morgan	(City of Cartersville)
Mr. Chad Prater	(City of Cartersville)

In addition, the City of Cartersville sets forth the following as its proposed stipulations in this matter:

1. The Georgia Public Service Commission ("Commission") has jurisdiction to hear this dispute between the parties pursuant to the Georgia Territorial Electric Service Act, O.C.G.A. §§ 46-3-1 through 46-3-15 (the "Territorial Act"). **[admitted in Georgia Power Company's ("GPC") response and answer ¶¶ 1-2]**
2. The City of Cartersville, Georgia ("Cartersville") and Georgia Power Company ("GPC") are "electric suppliers" as defined in the Territorial Act, O.C.G.A. § 46-3-3(3), and, for purposes of this proceeding, are subject to the jurisdiction of the Commission pursuant to the Territorial Act. **[admitted in GPC's response and answer ¶ 6]**

3. This dispute concerns a premises located at 1181 Cassville White Road, Cartersville, Georgia, (the "Property") upon which is situated a building previously developed for office and warehouse use (the "Building"). **[admitted in GPC's response and answer ¶ 7]**
4. The Property is within GPC's designated service area under the Territorial Act. **[admitted in GPC's response and answer ¶ 8]**
5. On February 24, 2022, GPC began serving the Property with a 300kVa transformer.
6. More recently, a proposal was made to convert the Building into a manufacturing facility (hereinafter the "Project") for Allied Tube & Conduit Corp. ("Atkore"), which manufactures electrical conduit and fittings, cable and cable management systems, infrastructure products, and safety and security products. **[admitted in GPC's response and answer ¶ 10]**
7. During or about June 2023, Atkore approached GPC about supplying electrical power for the Project. **[admitted in GPC's response and answer ¶ 11]**
8. The estimated electrical load for the Project was approximately 1.5MW, which would require a 1500kVa transformer. **[admitted in GPC's response and answer ¶ 12]**
9. The Property has single-metered service, and Atkore has a connected load which is 900 kilowatts or greater.
10. On or about June 20, 2023, GPC reported that it had ordered the transformer for the new project but that it would take 12-18 months to obtain the transformer. **[admitted in GPC's response and answer ¶ 14]**
11. On or about May 1, 2024, GPC set a 1500kVa transformer on the Property and "set up to bore to a kVa unit in the back." **[admitted in GPC's response and answer ¶ 18]**

The undersigned counsel for the City of Cartersville has forwarded the proposed stipulations to counsel for Georgia Power Company and anticipates that the parties will stipulate to a number of facts prior to the July 22, 2025 Pre-Hearing Conference.

If you have any questions, please do not hesitate to call.

Very truly yours,

SMITH CONERLY LLP

Charles S. Conerly

cc: Nancy Gibson (ngibson@psc.ga.gov)
Steven J. Hewitson (steven.hewitson@troutman.com)