**Georgia Power Company’s Application**

**for the Certification of the CARES 2023**

**Utility Scale Renewable Power Purchase Agreements**

**Docket No. 56181**

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**Utility Scale Renewable Power Purchase Agreements**

**Docket No. 56181**

**Applicant name, address and principal place of business:**

Georgia Power Company

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Atlanta, Georgia, 30308

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**Affidavit and Basis for the Assertion That Redacted Portions of Georgia Power Company’s Application**

**For the** **Certification of the CARES 2023 Utility Scale Renewable Power Purchase Agreements are Protected as Trade Secret**

As part of its Application for the Certification of the CARES 2023 Utility Scale Renewable Power Purchase Agreements in Docket No. 56181, (the “Application”) Georgia Power Company (“Georgia Power” or the “Company”) is submitting to the Georgia Public Service Commission (the “Commission”) copies of certain Power Purchase Agreements (“PPAs”), economic analysis, and pricing information (the “Information”). The trade secret portions of the Information (as highlighted) constitute trade secret information of Georgia Power and its affiliates, and its PPA counterparties, and is therefore protected from disclosure under Commission Rule 515-3-1-.11.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Specifically, the redacted terms of each PPA contain pricing, performance security, liquidated damages, contracted energy amounts, technology-specific technical specifications, and other delivery parameters that are specific to the winning bids. The trade secret portions of the Information are proprietary to the Company and the PPA counterparties, and not generally known by the public. The trade secret portions of the Information include the proprietary algorithms, building blocks, and operational data of the PPA counterparties used in structuring successful bids for emerging resource technology combinations and uses. Revealing these terms could compromise the Company’s ability to procure the resources that provide the most value to customers from other independent power suppliers in the future. In the event the trade secret portions of the Information were released, it is quite likely that future counterparties would use this information to set a floor for prices as they construct their own offers, thus artificially and inefficiently setting a market price and affecting other contract terms, resulting in agreements that may not be representative of the best cost resources that the market could offer. In addition, parties to the PPAs have agreed to maintain the confidentiality of these terms. Disclosure of the Information could have a chilling effect on the competitiveness and participation in future RFPs. Compromising the confidentiality of the trade secret portions of the Information could also harm the Company in its attempts to reasonably negotiate PPAs in the future.

The trade secret portions of the Information contained herein also include details concerning Georgia Power’s economic analyses of the PPAs, which would have economic value to other persons and competitors. If the Information were made public, competitors or bidders could use the Information to unfairly manipulate the request for proposals process to structure future bids based on the Company’s anticipated economic analysis of its PPAs, which could, in turn, increase costs to Georgia Power and its customers. This exposure would harm Georgia Power in its future PPA negotiation efforts. Georgia Power’s ability to negotiate the optimum price and contract terms for the benefit of customers would be undermined if competitors and suppliers had access to the analysis contained in the trade secret portions of the Information. Ultimately, the customers of Georgia Power would be harmed by higher rates and less reliability if such trade secret portions of the Information were publicly available.

The trade secret portions of the Information are subject to extensive efforts to maintain their confidentiality. Only select Georgia Power and Southern Company affiliate personnel and their legal counsel are granted access to the trade secret portions of the Information. Those personnel receive access only on a “need to know” basis. If a party outside of Georgia Power and Southern Company affiliates and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement with respect to the trade secret portions of the Information.

Marc Vinson, first being duly sworn, deposes and states that he has reviewed the Application and all other related documents included in this filing in Docket No. 56181, and that the specific information designated as trade secret constitutes trade secrets in accordance with O.C.G.A. § 10-1-761 (2019).

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Marc Vinson

Renewable Program Development Manager

Georgia Power Company

Subscribed and sworn to before me this 5th day of June, 2025.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Public

**Georgia Power Company’s Application for the Certification of the CARES 2023 Utility Scale Renewable Power Purchase Agreements**

**Docket No. 56181**

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Appendix A:

Georgia Power CARES 2023 Utility Scale PPA (Energy Only) with GA Solar 5, LLC

Georgia Power CARES 2023 Utility Scale PPA (Energy Only) with Wilsonville Solar, LLC

Georgia Power CARES 2023 Utility Scale PPA (Energy with Storage) with Beaver Creek Solar I, LLC

Georgia Power CARES 2023 Utility Scale PPA (Energy Only) with Stellar Dry Creek Solar, LLC

Georgia Power CARES 2023 Utility Scale PPA (Energy Only) with Stellar Shamrock Solar, LLC

**Georgia Power Company’s Application for the Certification of the CARES 2023 Utility Scale Renewable Power Purchase Agreements**

# Executive Summary

## Certification of Resources

Georgia Power Company (“Georgia Power” or the “Company”) files with the Georgia Public Service Commission (the “Commission”) its Application for the Certification of the CARES 2023 Utility Scale Renewable Power Purchase Agreements (“PPAs”), which have been awarded pursuant to the CARES 2023 Utility Scale Renewable Request for Proposal (“CARES 2023 US RFP”).

The Commission’s Order Adopting Stipulation in Docket No. 44160 regarding Georgia Power’s 2022 Integrated Resource Plan (“2022 IRP Final Order”) approved a stipulation setting forth a supply-side plan that included the directive to procure 2,100 MW of utility scale renewable resources, including 650 MW from around the clock carbon free energy resources (“CFE-ATC”). In addition, the Company rolled forward 1,250 MW left unfilled from previous utility scale renewable procurements for a total target of 3,350 MW to be procured through two requests for proposals (“RFP”). The Company subsequently issued the CARES 2023 US RFP seeking to procure 2,875 MW of utility scale renewable generation through an RFP process overseen by the Commission Staff and an Independent Evaluator (“IE”) pursuant to Commission Rule 515-3-4-.04(3) et seq.

Following completion of the CARES 2023 US RFP and pursuant to O.C.G.A. § 46-3A-4, Georgia Power now seeks to certify a 1,068 MW portfolio of standalone solar and solar plus storage resources through the five PPAs described below. Certifying these PPAs will continue the expansion of economical renewable resources, providing Georgia Power’s customers benefit from access to clean, sustainable, and affordable power options. As described in more detail below, the unfilled MW from the CARES 2023 US RFP will roll forward to the CARES 2025 US RFP.

## CARES 2023 Utility Scale Renewable PPAs

Pursuant to the 2022 IRP Final Order, on December 22, 2023, Georgia Power issued the CARES 2023 US RFP seeking to procure energy from approximately 2,875 MW of renewable resources, with anticipated in-service dates of 2026, 2027, and 2028, including up to 650 MW of renewable energy from CFE-ATC resources. Upon conclusion of the 2023 CARES US RFP, Georgia Power seeks to certify the 1,068 MW of economical renewable resources as set forth below. Georgia Power anticipates issuing the CARES 2025 Utility Scale Renewable RFP in 2025 to procure an additional 2,282 MW, which represents the remaining balance of the MW approved in the 2022 IRP Final Order and those rolled forward from previously unfilled utility scale renewable procurements.

Now, therefore, the Company seeks to certify the following renewable resources as part of the CARES 2023 US RFP:

1. A twenty-five (25) year PPA with GA Solar 5, LLC that will provide energy, Environmental Attributes, and Electrical Products from the 260 MW Old Hickory facility. The Old Hickory facility is located in Mitchell County, Georgia.
2. A thirty (30) year PPA with Wilsonville Solar, LLC that will provide energy, Environmental Attributes, and Electrical Products from the 200 MW Wilsonville Solar facility. The Wilsonville Solar facility is located in Coffee County, Georgia.
3. A twenty (20) year PPA with Beaver Creek Solar I, LLC that will provide energy and capacity benefits and the related Environmental Attributes and Electrical Products from the 274.50 MW Beaver Creek Solar facility, which includes a 91.5 MW Battery Storage Device. The Beaver Creek Solar facility is located in Wilkinson County, Georgia.
4. A twenty (20) year PPA with Stellar Dry Creek Solar, LLC that will provide energy, Environmental Attributes, and Electrical Products from the 200 MW Dry Creek facility. The Dry Creek facility is located in Jefferson County, Georgia.
5. A twenty (20) year PPA with Stellar Shamrock Solar, LLC that will provide energy, Environmental Attributes, and Electrical Products from the 225 MW Shamrock facility. The Shamrock facility is located in Laurens County, Georgia.

Collectively, the five CARES 2023 Utility Scale Renewable PPAs set forth above (the “CARES 2023 PPAs”) are economical resources that provide both energy and capacity benefits to Georgia Power customers. Certification of the addition of these new energy resources is appropriate under Georgia law and the Commission Rules. Georgia Power continues to evaluate additional bids elevated to the Short List from the Reserve List that may be in the best interest of all customers to pursue and could add to the resources procured in this solicitation.

# Issuance of Utility Scale Renewable RFP

The portfolio of CARES 2023 PPAs was procured through the first of two utility scale renewable RFPs approved in the 2022 IRP Final Order. The CARES 2023 US RFP sought to procure approximately 2,875 MW. Georgia Power sought renewable resources that could be in service by 2026, 2027, or 2028. Consistent with prior programs, the CARES 2023 RFP was made available to eligible renewable resources located anywhere in the United States.

In accordance with the Commission’s rule governing RFPs, the Company drafted the CARES 2023 US RFP, a pro forma Energy Only PPA, a pro forma Energy with Storage PPA, a pro forma CFE-ATC PPA, a pro forma Asset Purchase Agreement (“APA”), and a pro forma Build Transfer Agreement (“BTA”) (collectively, the “RFP Documents”) with input from potential RFP participants, the Commission Staff, and the IE. Drafts of the RFP Documents were posted on the IE Website on October 5, 2023, thereby opening the Comment Period. Georgia Power received 160 comments (52 on the RFP Documents and 108 on the proposed pro forma agreements) from 12 different commenters during the Comment Period. Each of the comments submitted was reviewed by the Company, Commission Staff, and the IE. Thereafter, responses to the comments were provided to the commenters by the IE on December 4, 2023. Georgia Power incorporated all appropriate revisions to the RFP Documents suggested by the market.

On October 11, 2023, a Bidders Conference webinar was held to allow potential bidders and interested parties the opportunity to receive more information about the RFP from Georgia Power, Commission Staff, and the IE, and to ask additional questions and further comment upon the RFP Documents.

In addition, the Company responded to 199 questions from RFP participants seeking clarification of the provisions of the RFP Documents through the Q&A function of the IE Website. Thereafter, on December 1, 2023, the Company filed the final RFP Documents, appropriately reflecting the feedback received from bidders and interested parties. After filing the Final RFP Documents, the Company proposed several additional modifications to clarify (i) that a bidder with a suspended Southern Company Interconnection Agreement (“IA”) must move its IA out of suspension within seven days after Short List notification and (ii) that the April 4, 2024, Interconnection Request Submittal Deadline was based on Southern Company’s timeframe and not that of a different Interconnection provider. In addition, the Company offered additional revisions to the RFP Documents to clarify that a facility located in a floodplain must obtain proper permits. The Commission approved the RFP Documents, as modified, on December 21, 2023. Georgia Power then issued the CARES 2023 US RFP on December 22, 2023, and required all bids to be submitted by February 12, 2024.

# Bid Evaluation

Georgia Power accepted bids through the IE Website from qualified bidders from January 18, 2024, through February 12, 2024. The Company received offers for almost 6,400 MW through 79 proposals from 29 unique bidders.

Proposals submitted for consideration in the RFP were reviewed and evaluated against each other and to the Company’s avoided cost projections, and the evaluation results were confirmed and approved by the IE and the Commission Staff. First, the Company evaluated bids based on each bid’s projected avoided cost benefits compared to its bid price and ranked them based on the levelized net benefits to Georgia Power’s customers. From this ranking, Georgia Power selected the Competitive Tier, which was comprised of bids in excess of the MW portfolio sought to ensure a sufficient number of projects remained under evaluation after subsequent transmission evaluation and re-ranking.

On May 23, 2024, Georgia Power filed a letter with the Commission addressing the Company’s proposed response to U.S. tariffs imposed on imported Chinese solar cells and modules and imported Chinese lithium-ion non-EV batteries. Given the potential impact of reinstated solar tariffs, the Company requested a rule waiver to modify the CARES 2023 US RFP to implement a limited bid refresh process prior to determining the Short List. The proposed refresh process permitted Competitive Tier bidders who paid Bid Security to (i) extend the commercial operation date (“COD”) of the proposed facility up to November 30, 2029, (ii) modify the bid price, or (iii) both. In addition, to address heightened reliability risk associated with including certain foreign-made battery components within projects connected to the Georgia Power electric system, the Company sought to modify the Battery Energy Storage System (“BESS”) requirements within the applicable pro forma contracts to limit the source countries of certain BESS components. The Commission approved the Company’s Request on June 13, 2024.

On June 21, 2024, Southern Environmental Law Center (“SELC”) filed a Motion for Reconsideration of the limitations on battery sourcing from specific countries. After significant discussion, on August 21, 2024, the Commission granted SELC’s motion and removed the Netherlands as a prohibited country for the sourcing or manufacturing of battery management systems, base controllers, and site controllers for equipment bid into the CARES 2023 US RFP (and all other active and future RFPs). Georgia Power was directed to monitor federal guidelines and alert the Commission if the Netherlands or any other country is added to the Foreign Entities of Concern as defined in 42 U.S.C. § 18741(5). Finally, the Commission ordered that if any terrorist action, cyber security, or mechanical failure as a result of sourcing equipment from the Netherlands, that the supplier of the material or part will be responsible for any and all cost to Georgia Power and its customers. On August 28, 2024, the Company filed revised RFP Documents to implement the Commission’s August 21, 2024 Order. The Commission approved the Company’s compliance filing with minor modification on September 24, 2024.

During the evaluation of Competitive Tier bids for the CARES 2023 US RFP, Georgia Power identified several long-lead time transmission projects required to provide firm transmission service to most of the proposed facilities by the expected commercial operation dates. To avoid eliminating potentially viable bids, Georgia Power, in consultation with the Commission Staff and IE, extended the date to determine the Short List for the CARES 2023 US RFP for several months to thoroughly investigate alternative solutions to preserve a majority of the Competitive Tier bids for further evaluation. To bridge the gap between commercial operation of the proposed facilities and the completion of the network upgrades required for firm transmission service, the Company proposed to incorporate the concept of non-firm transmission service into the CARES 2023 US RFP Pro Forma PPAs. On January 8, 2025, Georgia Power filed a request for Commission approval of revisions to the CARES 2023 US RFP Pro Forma PPAs to incorporate this Short-Term Network Service. The Commission approved these changes on January 28, 2025.

Georgia Power then completed its transmission evaluation to determine the costs of transmission grid improvements necessary to integrate the projects. These transmission costs were then imputed to each bid, and the Competitive Tier was reranked to reflect the transmission and distribution impacts in the total net benefit calculation. Georgia Power then conducted a due diligence portfolio analysis to consider and determine the cumulative transmission impacts of possible Short List bid combinations. The Commission Staff and IE confirmed Georgia Power’s transmission and portfolio analyses and the resulting impact on the Competitive Tier rankings.

On February 14, 2025, Georgia Power finalized its evaluation and analysis of Competitive Tier bids and identified a Short List of winning bidders to move forward with contracting and a Reserve List. The bids selected for the Short List were based upon the best value of the portfolio of proposals to the Company’s customers. In early March 2025, the Company, Commission Staff, and IE met with Short List bidders to discuss the proposed contract award and respond to any questions. Many of the Short List bidders expressed concerns about the impacts of changes in law and tariffs and the timing of security among other issues, and requested the Company consider changes to the Pro Forma PPAs prior to execution. The Company, Commission Staff, and the IE met several times to discuss this matter and agreed upon potential solutions and revisions to the Pro Forma PPAs to address the issues identified by Short List bidders. On April 3, 2025, the Company filed revised Pro Forma Energy and Energy with Storage PPAs for Commission approval, which was granted by the Commission without modification on May 6, 2025.

Five Short List bidders executed the CARES 2023 US RFP Pro Forma PPA, as revised, appropriate for its project. Throughout the process, the Commission Staff and the IE independently verified the process and steps taken by the Company as the Competitive Tier, Short List, and Reserve List were selected.

# Winning Bidders’ PPAs

Subject to the Commission’s certification, Georgia Power has executed CARES 2023 PPAs with GA Solar 5, LLC, Wilsonville Solar, LLC, Beaver Creek Solar I, LLC, Stellar Dry Creek Solar, LLC, and Stellar Shamrock Solar, LLC, (the “Winning Bidders”). Due to the pro forma nature of the PPAs, all changes requested following the Short List bidder meetings in March 2025 were made available to all Short List bidders, and no further substantive changes to the PPA terms were made following Commission approval of the revised Pro Forma PPAs on May 6, 2025.

The effectiveness of the PPAs is expressly conditioned upon the Commission’s approval. Appendix A contains copies of the CARES 2023 PPAs executed with Winning Bidders by the date of filing this Application.

# Total Net Benefit Analysis and PPA Pricing

## Total Net Benefit Analysis

The Company performed a total net benefit analysis of the CARES 2023 PPAs utilizing the Renewable Cost Benefit Framework (“RCB Framework”) and Best Cost Methodology as prescribed in the Commission’s 2022 IRP Final Order. The total net benefit analysis includes consideration for costs associated with each proposal netted against the projected avoided cost benefits using the RCB Framework. The costs consist of the payments made to the renewable generator plus any costs associated with system improvements necessary to deliver the energy to the Company’s customers, and any applicable costs identified through the RCB Framework. The total net benefit is the difference between the cost of energy from the renewable resources and the Company’s projected avoided costs, and any other additional costs and benefits identified through the RCB Framework (the “Total Net Benefit”). The payments made to the renewable generators will be calculated by multiplying the bid price times the amount of energy delivered. Energy is uniquely priced for each project, as shown in Table 5.2.

The transmission costs were provided by Georgia Power and Southern Company Services based on the characteristics of each facility described within the bids. The avoided costs for each bid were calculated by applying the hourly avoided cost projections from the Budget 2023 planning data to the hourly output from the renewable generator, as provided by the bidder, with consideration for the approved RCB Framework components. Each bid has a different avoided cost benefit because the typical hourly outputs differ between bids due to diverse design parameters such as location, tracking versus fixed systems, the DC/AC ratio, and orientation.

To fairly compare projects of different MW sizes, the Total Net Benefit of each bid was expressed in terms of a levelized dollar per megawatt hour ($/MWh). The CARES 2023 PPAs represent those projects with the highest Total Net Benefit to Georgia Power’s customers.

All of the CARES 2023 PPAs will include Short Term Network Service for approximately the first three years of the Term until the transmission upgrades required for firm service are completed.

## CARES 2023 PPA Pricing

Table 5.2 below provides the energy pricing for the CARES 2023 PPAs.

**Table 5.2– CARES 2023 PPA Pricing ($/MWh)**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Annual Period** | **Old Hickory Solar** | **Wilsonville Solar** | **Beaver Creek Solar** | **Dry Creek** | **Shamrock** |
| 1 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 2 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 3 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 4 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 5 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 6 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 7 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 8 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 9 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 10 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 11 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 12 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 13 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 14 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 15 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 16 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 17 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 18 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 19 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 20 | REDACTED | REDACTED | REDACTED | REDACTED | REDACTED |
| 21 | REDACTED | REDACTED |  |  |  |
| 22 | REDACTED | REDACTED |  |  |  |
| 23 | REDACTED | REDACTED |  |  |  |
| 24 | REDACTED | REDACTED |  |  |  |
| 25 | REDACTED | REDACTED |  |  |  |
| 26 |  | REDACTED |  |  |  |
| 27 |  | REDACTED |  |  |  |
| 28 |  | REDACTED |  |  |  |
| 29 |  | REDACTED |  |  |  |
| 30 |  | REDACTED |  |  |  |

The average cost of the Utility Scale Renewable PPAs over 31 years is approximately 5.4 cents per kilowatt hour.

# Certification Requirements

## 2022 IRP Impacts

Georgia Power sought 2,875 MW of renewable resources through the CARES 2023 US RFP, consistent with the 2022 IRP Final Order’s directive to procure energy from 2,100 MW and the rollover MW from prior RFPs. Through its evaluation of the submissions in the CARES 2023 US RFP, the Company selected a portfolio of 1,068 MW of economical renewable resources, using input data and assumptions consistent with the Budget 2023 planning assumptions. By selecting these PPAs, Georgia Power is maximizing the value customers will receive based on the characteristics of the competitive bids.

The 2025 IRP was filed on January 31, 2025, in Docket No. 56002, which reflects the Company’s updated generation needs. The Capacity Needs as identified in the Company’s 2025 IRP, and as revised to include the CARES 2023 PPAs, are provided in Section 6.2 below.

## Revised Near-Term Action Plan

Tables 6.2.1 and 6.2.2 below represent Georgia Power’s projected summer and winter capacity needs for 2025-2044. The tables are based on the same information as Table 8.1B from the 2025 IRP Main Document in Docket No. 56002 but are updated to incorporate (i) the results of the CARES 2023 US RFP and (ii) the Company’s February 2025 load forecast, which will be provided with Georgia Power’s 2025 IRP Rebuttal Testimony on June 9, 2025.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Table 6.2.1 – Georgia Power Projected Summer Capacity Need (MW)** | | | | | | | |
| Year | Peak Demand | Owned Generating Capacity | Purchased Generating Capacity | Dispatchable DSOs | Total Capacity | Capacity Required to Meet GPC Target | GPC Reserve Margin |
|  | (MW) | (MW) | (MW) | (MW) | (MW) | (MW) | (%) |
|  | (A) | (B) | (B,C) | (B) | (B) |  | (D) |
| 2025 | 17,716 | 13,868 | 7,410 | 729 | 22,007 | (999) | 24% |
| 2026 | 18,480 | 14,708 | 7,522 | 735 | 22,965 | (1,053) | 24% |
| 2027 | 19,971 | 16,028 | 7,522 | 739 | 24,290 | (609) | 22% |
| 2028 | 21,981 | 16,751 | 7,446 | 739 | 24,936 | 1,240 | 13% |
| 2029 | 24,373 | 16,752 | 6,981 | 742 | 24,475 | 4,550 | 0% |
| 2030 | 25,934 | 16,758 | 5,322 | 746 | 22,825 | 8,059 | -12% |
| 2031 | 27,081 | 16,678 | 5,535 | 751 | 22,965 | 9,285 | -15% |
| 2032 | 27,789 | 16,678 | 5,535 | 754 | 22,968 | 10,125 | -17% |
| 2033 | 28,289 | 16,678 | 5,480 | 759 | 22,916 | 10,772 | -19% |
| 2034 | 28,588 | 16,678 | 5,465 | 763 | 22,906 | 11,138 | -20% |
| 2035 | 28,778 | 16,210 | 3,748 | 766 | 20,725 | 13,546 | -28% |
| 2036 | 28,918 | 12,366 | 3,620 | 770 | 16,756 | 17,680 | -42% |
| 2037 | 29,188 | 12,366 | 3,461 | 777 | 16,604 | 18,154 | -43% |
| 2038 | 29,385 | 12,366 | 3,237 | 783 | 16,386 | 18,608 | -44% |
| 2039 | 29,638 | 11,718 | 3,237 | 789 | 15,744 | 19,551 | -47% |
| 2040 | 29,795 | 11,718 | 2,928 | 803 | 15,448 | 20,033 | -48% |
| 2041 | 30,150 | 11,718 | 2,876 | 813 | 15,407 | 20,498 | -49% |
| 2042 | 30,542 | 11,718 | 2,866 | 824 | 15,408 | 20,963 | -50% |
| 2043 | 30,946 | 11,718 | 2,861 | 835 | 15,414 | 21,438 | -50% |
| 2044 | 31,419 | 11,718 | 2,858 | 846 | 15,422 | 21,993 | -51% |
| **Notes** (A) Territorial Load requirements less non-dispatchable demand-side options (“DSOs”). (B) Values reflect effective load carrying capability (“ELCC”). (C) Includes territorial and imported power purchases. Capacity does not include the 500 MW Energy Storage System (“ESS”) RFP approved in the 2022 IRP to show total procurement needs. (D) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin resulting from a System Target Reserve Margin of 19.50% (2025-2027) and 20% (2028 and beyond). | | | | | | | |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Table 6.2.2 – Georgia Power Projected Winter Capacity Need (MW)** | | | | | | | |
| Year | Peak Demand | Owned Generating Capacity | Purchased Generating Capacity | Dispatchable DSOs | Total Capacity | Capacity Required to Meet GPC Target | GPC Reserve Margin |
|  | (MW) | (MW) | (MW) | (MW) | (MW) | (MW) | (%) |
|  | (A) | (B) | (B,C) | (B) | (B) |  | (D) |
| 2024/2025 | 16,236 | 14,306 | 5,913 | 649 | 20,868 | (637) | 29% |
| 2025/2026 | 16,750 | 15,164 | 6,012 | 652 | 21,829 | (957) | 30% |
| 2026/2027 | 17,808 | 16,545 | 6,242 | 656 | 23,443 | (1,253) | 32% |
| 2027/2028 | 19,501 | 16,801 | 6,503 | 656 | 23,960 | 442 | 23% |
| 2028/2029 | 21,696 | 17,272 | 5,723 | 659 | 23,654 | 3,495 | 9% |
| 2029/2030 | 23,517 | 17,273 | 5,758 | 661 | 23,693 | 5,735 | 1% |
| 2030/2031 | 24,769 | 17,218 | 3,769 | 665 | 21,652 | 9,342 | -13% |
| 2031/2032 | 25,590 | 17,194 | 3,769 | 667 | 21,630 | 10,392 | -15% |
| 2032/2033 | 26,160 | 17,194 | 3,714 | 670 | 21,578 | 11,158 | -18% |
| 2033/2034 | 26,436 | 17,194 | 3,710 | 673 | 21,577 | 11,504 | -18% |
| 2034/2035 | 26,623 | 16,724 | 2,393 | 675 | 19,792 | 13,522 | -26% |
| 2035/2036 | 26,706 | 12,759 | 1,812 | 676 | 15,247 | 18,172 | -43% |
| 2036/2037 | 26,923 | 12,759 | 1,745 | 681 | 15,185 | 18,505 | -44% |
| 2037/2038 | 27,170 | 12,759 | 1,395 | 703 | 14,857 | 19,143 | -45% |
| 2038/2039 | 27,548 | 12,110 | 1,395 | 711 | 14,217 | 20,256 | -48% |
| 2039/2040 | 27,851 | 12,110 | 1,035 | 720 | 13,865 | 20,986 | -50% |
| 2040/2041 | 28,222 | 12,110 | 1,015 | 728 | 13,853 | 21,463 | -51% |
| 2041/2042 | 28,605 | 12,110 | 1,012 | 737 | 13,860 | 21,935 | -52% |
| 2042/2043 | 29,028 | 12,110 | 1,010 | 748 | 13,868 | 22,456 | -52% |
| 2043/2044 | 29,446 | 12,110 | 1,010 | 758 | 13,878 | 22,970 | -53% |
| **Notes** (A) Territorial Load requirements less non-dispatchable DSOs. (B) Values reflect effective load carrying capability (“ELCC”). (C) Includes territorial and imported power purchases. Capacity does not include the 500 MW ESS RFP approved in the 2022 IRP to show total procurement needs. (D) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin resulting from a System Target Reserve Margin of 25.50% (2025-2027) and 26% (2028 and beyond). | | | | | | | |

## Proposed Ratemaking Treatment of Costs

The 2022 IRP Final Order directed that the costs to implement and administer the CARES 2023 US RFP, that are not being recovered elsewhere by the Company, will be included in the fuel clause and recovered through the Fuel Cost Recovery (“FCR”) mechanism.

## Additional Sum

The IRP statute provides for the Company to receive an additional sum. Specifically, O.C.G.A. § 46-3A-8 provides as follows:

The approved or actual cost, whichever is less, of purchase of any certified long-term power purchase shall be recovered in rates by the utility, along with an additional sum as determined by the commission to encourage such purchases. The commission shall consider lost revenues, if any, changed risks, and an equitable sharing of benefits between the utility and its retail customers.

When calculating an additional sum, the statute specifically requires that the Commission consider lost revenues, changed risks, and an equitable sharing of benefits. Lost revenues are calculated by considering the net income loss by the Company from procuring the PPA instead of building a project scaled to match the PPA.

The 2022 IRP Final Order provides for an additional sum of $4.00/kW-year, to be recovered on a levelized basis annually for the term of the Utility Scale Renewable PPAs. The Company is requesting an additional sum for each PPA beginning on the Facility’s COD.

# Conclusion

The five CARES 2023 PPAs contracted to deliver energy from 1,068 MW of solar and solar plus storage resources were selected as the best cost offers in the CARES 2023 US RFP. Procuring 1,068 MW is within the range of the 2,875 MW originally sought. Georgia Power conducted the RFP process in accordance with the Commission’s RFP rules, which ensured fair and equal treatment of all bidders. The IE and Commission Staff were involved throughout the process, from the development of the RFP Documents through the evaluation of bids, selection of the Competitive Tier and Short List, and execution of the final PPAs. The use of the IE Website for questions and comments regarding this RFP further ensured that the process was fair and also transparent to all participants. The evaluation process involved a fair and thorough analysis of all proposals. The projects selected for certification represent the best cost proposals for meeting the CARES 2023 US RFP procurement target.

For the reasons set forth herein above and, to continue to provide an economical and diverse generation resource mix for the benefit of customers, the Company requests the Commission grant a certificate of public convenience and necessity for the five CARES 2023 PPAs and approve the requested additional sum.

**APPENDIX A**

**Electronic Copies of the Utility Scale Renewable PPAs have been attached as separate PDF files.**