BEFORE THE STATE OF GEORGIA
PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
GEORGIA POWER COMPANY'S 2022	)	
RATE CASE	)	Docket No. 44280
	)	
	)	

SIERRA CLUB'S AMENDMENT TO ITS APPLICATION FOR LEAVE TO INTERVENE ADDING NRDC AND SACE AS CO-INTERVENORS

COME NOW, the Sierra Club, the Southern Alliance for Clean Energy ("SACE"), and the Natural Resources Defense Council ("NRDC"), pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Commission Rule 515-2-1-.06, and hereby file this Application to Amend the Application for Leave to Intervene ("Application") before the Georgia Public Service Commission (the "Commission") in the above-referenced dockets. In support hereof, Sierra Club, SACE, and NRDC (hereinafter "Environmental Intervenors") respectfully show as follows:

1.

Sierra Club is the nation's oldest and largest grassroots environmental organization, with over 600,000 members nationwide, including nearly 9,000 in Georgia. Sierra Club's mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's resources and ecosystems; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. As part of this mission, the Sierra Club works on behalf of its members to help transition the power generation industry away from fossil fuels and towards a clean energy economy. Additionally, Sierra Club members purchase electricity from Georgia Power Company. The Commission's actions in these dockets may affect their consumption, costs, and terms of service for the purchase of electricity. As a result, the Sierra Club has substantial interests in the outcome of this proceeding and desires to intervene to protect those interests.[1]

SACE is a regional nonprofit with over 3,500 members in Georgia. SACE also has staff in Atlanta. SACE's purposes include education and research concerning the environment, public

[1] O.C.G.A § 46-2-59 (e)(2).

health, and economic impacts of energy use and policy in the Southeast. Additionally, both members and staff are ratepayers of Georgia Power Company. The Commission's actions in these proceedings will affect the planning and operation of Georgia Power Company's supply and distribution system. The Commission's decisions will directly impact the amount SACE members pay on their electric bills now and possibly for the next 60 years. Therefore, SACE has a substantial interest in the outcome of the proceeding and respectfully requests to participate.

NRDC is a nonprofit organization representing over three million members, including over 9,000 members in Georgia, across the globe. Its staff of lawyers, scientists, and other environmental experts work to confront the climate crisis, protect the planet's wildlife and wild places, and ensure the rights of all people to clean air, clean water, and healthy communities. In addition to its members in Georgia, NRDC partners with Atlanta organizations for inclusive, equitable, climate-wise, and healthy community development through training, technical assistance, and capital. The Commission's actions in this proceeding will affect NRDC's interest in decarbonization and the right to a healthy environment. Further, NRDC members and partner organizations are Georgia Power Company ratepayers. NRDC has a substantial interest in this proceeding and accordingly requests to intervene.

2.

On June 24, 2022, Georgia Power filed its 2022 Rate Case, under Docket No. 44280, with the Commission.

On July 25, 2022, the Sierra Club filed an Application for Leave to Intervene in this docket, which was granted.

On December 30, 2022, the Commission issued its Order Adopting Settlement Agreement as Modified. In that Order, the Commission approved a three-year Alternative Rate Plan ("ARP"), providing that the Georgia Power Company must file a new base rate case by July 1, 2025.

Instead, on May 19, 2025, Georgia Power Company and the Public Interest Advocacy Staff requested that the Commission grant a Joint Petition to Approve the Stipulation to Extend the ARP, extending rates for an additional three years.

On May 20, 2025, the Commission approved a procedural and scheduling order for this docket. Pursuant to the procedural and scheduling order, Environmental Intervenors timely file this Application to allow SACE and NRDC to participate in the above-referenced docket.[2]

3.

[2] *Id.* at (c).

SACE and NRDC are interested in the responsible transition from fossil fuel-based electric generating plants to meeting electricity demand with clean energy and adequate energy planning for economic interests and public health. These goals align with the Sierra Club's mission and interests in the proceeding.

SACE and NRDC respectfully request that they be granted leave to intervene and participate fully as a party, alongside the Sierra Club, in these proceedings, including the right to present testimony and exhibits, cross-examine witnesses, and file briefs. While Environmental Intervenors have not yet determined all the witness testimony they would offer, they anticipate providing expert testimony regarding rate stability, cost of service studies, and .

4.

SACE and NRDC's participation in this matter will not unduly delay these proceedings or prejudice any other party.[3] SACE previously was granted party status as an intervenor in the 2010, 2013, 2016, 2019, 2022, 2023, and 2025 Georgia Power Company IRP proceedings. NRDC previously was granted party status as an intervenor in the 2025 Georgia Power Company IRP proceeding and the 2011 Demand Side Management Working Group. Consequently, SACE and NRDC are familiar with the Commission's hearing procedures and applicable rules, ensuring efficient and orderly conduct in the proceeding.[4]

5.

Sierra Club, NRDC, and SACE request that the following persons be included on the service list in these dockets and that all communications regarding these dockets be directed to them:

For Sierra Club:
Isabella Ariza
50 F Street NW, 8th Floor
Washington, DC 2001
857 999 6267
isabella.ariza@sierraclub.org

Curt Thompson
Attorney at Law
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100
Duluth, GA 30096
(470) 375-6962 Office

[3] *Id.*; O.C.G.A § 50-13-14 (2).
[4] Commission Rule 515-2-1-.06 (3).

curtbthompson@bellsouth.net

For SACE:
Maggie Shober
Southern Alliance for Clean Energy
PO Box 1842 Knoxville, TN 37901
865-235-1448
maggie@cleanenergy.org

Heather Pohnan
Southern Alliance for Clean Energy
691 John Wesley Dobbs Ave NE, Suite C
Atlanta, GA 30312
heather@cleanenergy.org

Eddy Moore
Southern Alliance for Clean Energy
PO Box 1842 Knoxville, TN 37901
865-235-1448
eddy@cleanenergy.org

For NRDC:
Patrick King II
Natural Resources Defense Council
1152 15th St NW #300 Washington, DC 20005
225-241-2140
pkingii@nrdc.org

Luis Martinez
Natural Resources Defense Council
1152 15th St NW #300 Washington, DC 20005
212-727-4550
lmartinez@nrdc.org

Amanda Levin
Natural Resources Defense Council
1152 15th St NW #300 Washington, DC 20005
202- 289-2370
alevin@nrdc.org

Maeve Sneddon
Natural Resources Defense Council
1152 15th St NW #300 Washington, DC 20005
202-836-9322
msneddon@nrdc.org

Respectfully submitted this June 5th, 2025.

Curt Thompson
Attorney at Law
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100
Duluth, GA 30096
(470) 375-6962 Office
curtbthompson@bellsouth.net

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VERIFICATION OF SIERRA CLUB'S AMENDMENT TO ITS APPLICATION FOR LEAVE TO INTERVENE ADDING NRDC AND SACE AS CO-INTERVENORS

Personally appeared before the undersigned officer, duly appointed to administer oaths in the State and County aforesaid, Isabella Ariza, who, after being duly sworn, deposes and says that he is a Senior Attorney for the Sierra Club and that the facts contained in the foregoing Application to Amend the Application for Leave to Intervene are true and correct to the best of his information and belief.

This 4 day of June 2025.

Isabella Ariza

Sworn to and subscribed
before me this 4 day
of June 2025.

Notary Public
My Commission Expires: 4/14/2030

CADEN MCKEE KOONTZ NOTARY PUBLIC DISTRICT OF COLUMBIA

BEFORE THE STATE OF GEORGIA
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RATE CASE	)	Docket No. 44280
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VERIFICATION OF SIERRA CLUB'S AMENDMENT TO ITS APPLICATION FOR LEAVE TO INTERVENE ADDING NRDC AND SACE AS CO-INTERVENORS

Personally appeared before the undersigned officer, duly appointed to administer oaths in the State and County aforesaid, Margaret (Maggie) Shober, who, after being duly sworn, deposes and says that she is a Research Director for the Southern Alliance for Clean Energy, and that the facts contained in the foregoing Application to Amend the Application for Leave to Intervene are true and correct to the best of her information and belief.

This 5 day of June 2025.

Margaret E S Shober

Margaret Shober

County of Hampton, Commonwealth of Virginia
Sworn to and subscribed
before me this 5th day
of June 2025.

Dequan Winborne, Electronic Notary Public

Notary Public
My Commission Expires: 06/30/2025

COMMONWEALTH OF VIRGINIA · ELECTRONIC NOTARY PUBLIC · N

Dequan Winborne

REGISTRATION NUMBER
7940580
COMMISSION EXPIRES
June 30, 2025

Notarized remotely online using communication technology via Proof.

BEFORE THE STATE OF GEORGIA
PUBLIC SERVICE COMMISSION

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VERIFICATION OF SIERRA CLUB'S AMENDMENT TO ITS APPLICATION FOR LEAVE TO INTERVENE ADDING NRDC AND SACE AS CO-INTERVENORS

Personally appeared before the undersigned officer, duly appointed to administer oaths in the State and County aforesaid, Luis Martinez, who, after being duly sworn, deposes and says that he is a Southeast Climate and Energy Director for the Natural Resources Defense Council, and that the facts contained in the foregoing Application to Amend the Application for Leave to Intervene are true and correct to the best of his information and belief.

This 5 day of June 2025.

Luis Martinez

Sworn to and subscribed
before me this 5th day
of June 2025.

Notary Public
My Commission Expires: 10/16/27

Anna Schlobohm
Notary Public
Henderson County, NC
My commission Expires: 10/16/2027

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CERTIFICATE OF SERVICE

I do hereby certify that I have this 6th day of June 2025, served the following parties with the foregoing **VERIFICATION OF SIERRA CLUB'S AMENDMENT TO ITS APPLICATION FOR LEAVE TO INTERVENE ADDING NRDC AND SACE AS CO-INTERVENORS**, via hand delivery, email, and or US mail as follows:

Curt Thompson
Attorney at Law
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100
Duluth, GA 30096
(470) 375-6962 Office
curtbthompson@bellsouth.net