STATE OF GEORGIA

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re:

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

REBUTTAL TESTIMONY OF

DR. ROSS BEPPLER, CARLEY GOFF, AND A. WILSON MALLARD

JUNE 9, 2025

REBUTTAL TESTIMONY OF
DR. ROSS BEPPLER, CARLEY GOFF, AND A. WILSON MALLARD
IN SUPPORT OF GEORGIA POWER COMPANY'S
2025 INTEGRATED RESOURCE PLAN
DOCKET NO. 56002

AND

APPLICATION FOR THE CERTIFICATION, DECERTIFICATION, AND AMENDED DEMAND SIDE MANAGEMENT PLAN
DOCKET NO. 56003

I. INTRODUCTION

Q. PLEASE STATE YOUR NAMES, TITLES, AND BUSINESS ADDRESSES.

A. My name is Dr. Ross Cannon Beppler. I am the Load Flexibility and Analysis Manager for Southern Company Services ("SCS"). My business address is 241 Ralph McGill Boulevard, N.E., Atlanta, Georgia 30308.

A. My name is Carley Jones McCloskey Goff. I am the Director of Demand Planning and Analysis for SCS. My business address is 241 Ralph McGill Boulevard, N.E., Atlanta, Georgia 30308.

A. My name is Andrew Wilson Mallard. I am the Director of Renewable Development for Georgia Power Company ("Georgia Power" or the "Company"). My business address is 241 Ralph McGill Boulevard, N.E., Atlanta, Georgia 30308.

Q. DID YOU PREVIOUSLY PRESENT DIRECT TESTIMONY ON BEHALF OF GEORGIA POWER IN THESE PROCEEDINGS?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of our testimony is to respond to the testimony of the Georgia Public Service Commission ("Commission") Public Interest Advocacy Staff ("Staff') and various Intervenors in this proceeding. Due to the number of parties that filed testimony in this proceeding as well as the limited time available to file rebuttal testimony, our testimony focuses on key issues and does not attempt to address every issue raised in Staff or Intervenor testimony. The fact that the Company may not respond to or address a particular position advocated by Staff or an Intervenor should not be construed as acceptance of such position.

Q. PLEASE SUMMARIZE THE TESTIMONY OF THE PANEL.

A. The Company set forth a Demand Side Management ("DSM") plan developed in accordance with the Commission-approved DSM Program Planning Approach, per Commission orders, and in collaboration with the DSM Working Group ("DSMWG"). If adopted, the Proposed Case is projected to result in, on average, approximately 224 megawatts ("MW") of peak demand reduction and 741 gigawatt hours ("GWh") of energy reductions annually for 2026–2028. The Company continues to support offering DSM programs that minimize upward pressure on rates and maximize economic efficiency, especially as those programs contribute to high customer satisfaction. If the Commission elects not to approve the Proposed Case, Staff's recommended changes to the Capacity and Affordability Case are reasonable.

The Commission should approve the Company's renewable resource request for proposals ("RFP") process enhancements and customer program updates as requested by the Company. Staff is supportive of almost all the Company's requests, which demonstrates not only the reasonableness of the proposal but also Georgia Power's continued efforts to obtain and incorporate feedback from participants and interested parties. The Company's proposed enhancements to the utility scale and distributed generation ("DG") RFPs and Clean And Renewable

Energy Subscription ("CARES") program appropriately respond to market feedback, increase the likelihood procurements will meet Commission-approved RFP targets, help to address growing customer interest in and access to more renewable resources, with continued commitment to maximize benefits to all customers. The Commission should not give any weight to Intervenor requests for changes to the terms and conditions of the Company's Renewable RFPs and pro forma contracts in this forum since that feedback is best provided through the Company's and this Commission's existing RFP process.

The Commission should approve the Company's Customer-Sited Solar Plus Storage Pilot Program as proposed by Georgia Power. The Solar Plus Storage Pilot was developed following the 2023 IRP Update and was designed based on current market best practices and feedback from stakeholders. The design appropriately considers the incentives needed to drive participation and practical pilot limitations and provides an opportunity for the Company to learn and solicit feedback from two distinct participation pathways. As more information is gleaned from the pilot, programmatic modifications may be appropriate in the future. The Commission should approve the Vehicle to Grid pilot program; the Company's proposed changes to its distributed energy resource ("DER") programs, including approval of the new Large Customer Owned Resiliency ("LCOR") Program; and the proposed modifications to the Customer Connected Solar Program ("CCSP"); all of which were unopposed by parties to this case.

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. Our testimony is organized as follows:

- Section II responds to Staff and Intervenor recommendations related to Georgia Power's proposed Demand Side Strategy;
- Section III addresses certain recommendations regarding the Company's Renewable RFPs; and

- Section IV responds to Staff and Intervenor recommendations and critiques of the proposed Customer Programs.

II. DEMAND SIDE STRATEGY

Q. PLEASE DESCRIBE THE COMPANY'S DSM PLAN FILED IN THIS CASE.

A. The Company's DSM plan was developed in accordance with the Commission-approved DSM Program Planning Approach, per Commission orders, and in collaboration with the DSMWG. The Company developed four DSM cases in this proceeding: the Proposed Case; the DSMWG Advocacy Case; the Supply-Side Case; and the Capacity and Affordability Case. The Company supports the adoption of the Proposed Case, which includes a DSM savings target of at least 0.75% of annual retail sales as required by the Commission's Order Adopting Stipulation in the Vogtle Prudency Proceeding in Docket No. 29849 ("Vogtle Prudence Order"). Each of the other three cases demonstrate varying levels of DSM investment and their impacts.

In support of its Proposed Case, the Company seeks Commission approval for its DSM Action Plan, including (i) approval for a certificate of public convenience and necessity for one new residential DSM program, (ii) decertification of three previously certified DSM programs, (iii) amended certificates for four previously certified DSM programs, (iv) a waiver of the Total Resource Cost test requirement for four previously certified DSM programs, and (v) updated program economics for all other previously certified DSM programs. Approval of these DSM programs is projected to result in, on average, approximately 224 MW of peak demand reduction and 741 GWh of energy reductions annually for 2026–2028.

Q. WHAT DSM PLAN DOES STAFF RECOMMEND THE COMMISSION APPROVE?

A. As described in the testimony of Staff Witnesses Barber, Cooper, and Spellman, Staff recommends the Commission approve its Recommended Case, which includes adjustments to the Company's proposed Capacity and Affordability Case to increase the energy and demand savings goals, with associated increases to DSM program budgets.[1]

Q. IS STAFF'S RECOMMENDED CASE REASONABLE?

A. Yes. If the Commission elects not to approve the Proposed Case, the Staff's recommended changes to the Capacity and Affordability Case are reasonable.

Q. DOES THE COMPANY AGREE WITH STAFF'S RECOMMENDATION THAT IT BE REQUIRED TO INCLUDE AN ADDITIONAL "INTEGRATED MODELING CASE" IN THE 2028 IRP?

A. No. Staff's recommendation to require the Company to continue including the Supply Side Case, in which DSM is allowed to compete head-to-head with supply-side options in the IRP model, is unnecessary. The Supply Side Case, which was originally proposed by Staff and Intervenors, is an administrative burden to prepare, and has never been supported or recommended by any party in any case.

Rather, the Company determines an appropriate portfolio of DSM measures and programs to benefit its customers through the DSM program planning process that includes: (1) utilizing standard utility cost-effectiveness screening tools; (2) incorporating input from a variety of stakeholders as well as the Company's third-party design consultant; (3) leveraging lessons learned through program delivery, program evaluation, and historical program performance to create the proposed

[1] Direct Testimony of Jamie Barber, Nicholas Cooper, and Richard F. Spellman, Docket Nos. 56002 & 56003 (May 5, 2025) ("Barber, Cooper, & Spellman") at 7:10–16.

DSM portfolio; and (4) collaboration with Staff and the DSMWG. Further, the Company already evaluates DSM on a level playing field with supply-side resources by utilizing the same underlying system assumptions for both supply-side and demand-side resource evaluations. The production of the "Integrated Modeling" or Supply Side Case does not inform the ultimate DSM portfolio. Instead, the inclusion of this additional case as requested by Staff results in the expenditure of significant time and resources with no measurable benefit to customers.

DSM Budget

Q. PLEASE RESPOND TO STAFF'S TESTIMONY REGARDING THE COMPANY'S DSM BUDGET.

A. Staff contends that the Proposed Case budget increase does not align with current or past program spending or with Commission policy or precedent. Although Staff's contention is true that the Proposed Case budget is higher than past program spending, the increased budget is required in light of the increased savings target included in the Commission's Vogtle Prudence Order. Therefore, the budget reflects the increased cost to achieve the required 0.75% savings target.

Q. WHY IS IT NOT FEASIBLE TO SIMPLY CAP THE PROPOSED BUDGET AT 1% OF RETAIL REVENUES UNDER THE PROPOSED CASE, AS GIPL/SOUTHFACE WITNESS SHERWOOD RECOMMENDS?

A. Georgia Interfaith Power & Light and Southface Energy Institute ("GIPL/Southface") Witness Sherwood recommends that the annual budget not exceed 1% of retail revenues to achieve the Proposed Case savings target.[2] This recommendation is unrealistic and imposes an arbitrary cap on the Company's budget that is divorced from the actual programs and program implementation

[2] Direct Testimony of Stacey Sherwood, Docket Nos. 56002 & 56003 (May 2, 2025) ("Sherwood") at 5:7–9.

requirements, as well as what is required to achieve savings in the future. Further, by relying on the prior year's retail sales to determine the 1% budget calculation, DSM program implementation would be unnecessarily delayed due to the lag in closing the prior year's books and the need to identify and hire program implementers based on a known budget.

Q. PLEASE RESPOND TO THE COMPARISONS MADE BY GIPL/SOUTHFACE OF THE COMPANY'S HISTORIC AND PROJECTED ENERGY SAVINGS TO THOSE OF OTHER STATES.

A. To compare energy savings with those achieved by other utilities operating in other states assumes that each state and utility have similar DSM policies and regulatory requirements. That is not the case. Each state reaches its own determination of the specific policies that guide customer-subsidized DSM implementation. Such policies are impacted by the various state-specific considerations, including program maturity, energy intensity of customers, regional climate differences, the cost of electricity, regulatory structure, capacity needs, state energy efficiency and renewable energy portfolio standards, and participation in regional greenhouse gas initiatives. For example, public utilities in North Carolina are subject to state-wide energy efficiency standards,[3] which are not similarly required in Georgia. Further, in states where the cost of electricity is higher, kilowatt hour ("kWh") savings from DSM programs are more economic and impactful. This same logic applies to Witness Sherwood's recommendation that the Commission compare the Company's DSM budget to that of other utilities.[4]

GIPL/Southface Witness Sherwood attempts to use the Company's American Council for an Energy-Efficient Economy ("ACEEE") Scorecard results to bolster her position; however, as she admitted through cross examination, Georgia Power's ACEEE scorecard results are in line with the "peer utilities" that Witness Sherwood

[3] *See* N.C. Gen. Stat. § 62-133.8(b) (2023).
[4] Sherwood at 3:9–24.

self-selected and better than other utilities in surrounding states such as Florida Power and Light and Duke Energy Florida.[5]

On-Bill Financing

Q. PLEASE RESPOND TO THE RECOMMENDATION THAT THE COMPANY OFFER ON-BILL FINANCING PROGRAMS.

A. It is not prudent to offer on-bill financing due to the lack of success of the Residential Investment Saving Energy ("RISE") Pilot and the ultimate expense to customers. Georgia Power previously offered a program similar to on-bill financing for income-qualified customers in its RISE Pilot program. Under the RISE Pilot, the Company covered the upfront cost of energy efficiency and demand side management improvements and recovered those costs over time through a charge applied under a customer-specific RISE Tariff. However, covering the upfront costs for customers who later paid a charge over time did not increase customer adoption of or participation in energy efficiency measures. It was also difficult to find qualifying customers for the RISE Pilot, which resulted in only 18 qualifying customers despite being extended from three to six years. In most cases, customers did not qualify because it would have taken longer than the life of the installed equipment to pay back savings. There is no evidence that a third-party financing arrangement would have helped the RISE Pilot be more successful than the tariff-based approach, which offered customers the same benefit of participating without an upfront investment. Notably, after the pilot concluded, an independent program evaluator determined that the pilot was unsuccessful.

[5] Tr. 103 (Intervenor Hearing Day 3) Note that citations to the Staff and Intervenor hearings on May 27–29, 2025, are based on the rough draft of the transcript provided by the court reporter.

DSM Costs and Additional Sum

Q. WHAT DSM COSTS ARE THE COMPANY REQUESTING THE COMMISSION APPROVE?

A. Consistent with prior IRPs, the Company is requesting that the Commission approve the costs for all approved and certified DSM programs, pilots, and other activities as summarized in Appendices C-1 and C-2 of the DSM Application. The Company has also requested approval of an additional sum, detailed in Appendix F to the DSM Application.

Q. PLEASE EXPAND UPON THE COMPANY'S REQUEST FOR AN ADDITIONAL SUM.

A. As stated in the DSM Application, the Company is seeking Commission approval of an additional sum of $0.04 for every kWh saved, using the verified, net energy savings values applied to all certified DSM programs included in the residential and commercial DSM portfolios.

Q. WHY IS THE COMPANY PROPOSING TO AMEND THE ADDITIONAL SUM CALCULATION?

A. The Company proposes to amend the additional sum calculation to provide an incentive for the utility to value all energy savings the same. This proposal also provides more stability in the metric used to determine additional sum and certainty in the amount of incentive that the Company will receive for implementing DSM programs, as allowed by state law, while reducing resources needed by the Company and Staff in reviewing and verifying the data. All certified DSM programs with energy savings will be included in the additional sum calculation. Any authorized additional sum will be specific to the corresponding customer class and will be collected through the Residential and Commercial DSM tariffs. The additional sum included in the DSM tariffs will apply the $0.04 per kWh saved to the total net energy savings estimated in the Company's 2025 Proposed Case. The

Company supports the annual true-up of the DSM tariffs based on reported energy savings and actual revenues collected.

Q. DOES STAFF AGREE THAT THE COMPANY SHOULD RECEIVE AN ADDITIONAL SUM?

A. Yes. Staff Witnesses Barber, Cooper, and Spellman agree that the Company should receive an additional sum. However, they recommend that Company maintain the current DSM additional sum mechanism as approved in the 2022 IRP for market-rate programs. Additionally, Staff recommends the Company earn $0.02 per kWh saved on net energy savings from income-qualified programs.[6]

Q. WHY SHOULD THE COMMISSION APPROVE THE COMPANY'S PROPOSED ADDITIONAL SUM ALONG WITH THE CHANGES IN METHODOLOGY?

A. The Company has proposed an additional sum of $0.04 per kWh saved, which represents a reasonable additional sum and is in line with the average amount per kWh earned since 2012 through the previously approved annual DSM true-up process. Currently, Georgia Power receives little to no additional sum from residential DSM programs that deliver kWh savings. Accordingly, under the proposed methodology, energy savings will be valued from every program equally. This better aligns the additional sum with the energy savings achieved from the customer classes eligible to participate in the Company's DSM programs. The proposed methodology also provides a simplified approach that will streamline reporting and provide more clarity associated with the annual DSM tariff true-up process.

[6] Barber, Cooper, & Spellman at 41:13–21, 48:1–18.

III. RENEWABLE PROCUREMENT STRATEGY

Q. PLEASE PROVIDE A BRIEF OVERVIEW OF THE PROPOSED ENHANCEMENTS TO THE COMPANY'S RENEWABLE PROCUREMENT STRATEGY.

A. As detailed in this panel's Direct Testimony, Georgia Power has proposed several enhancements to the Utility Scale and DG RFPs. For Utility Scale RFPs, the Company proposes adding flexible Required Commercial Operation Dates ("RCODs"), which, if approved, will allow projects to have a range of acceptable in-service dates. The Company will continue to consider the use of Transmission System operational tools and flexibility that support interconnection viability for projects and portfolios of projects. And as discussed further below, the Company proposes a submission price refresh and extended RFP period to allow for the procurement of additional renewable resources to meet customer needs.

For its DG RFPs, the Company proposes to make the energy procured available for subscription by interested customers and seeks to include paired solar and storage resources to deliver additional capacity value to benefit all customers. Similar to the proposed Utility Scale RFP enhancements, the Company seeks to modify the DG RFP process to allow for additional resources to be procured if proven beneficial for customers. Finally, the Company proposes to update the Renewable Cost Benefit framework used in the DG evaluation process to assign value to projects based on their geographic location. By incorporating locational value into the DG RFP evaluation, the Company aims to incentivize strategic siting decisions by developers and secure a portfolio of projects that provides maximum value for customers.

In the event there are unmet CARES customer subscription needs in either the Utility Scale or DG RFPs, the Company has proposed modifications to the RFP process to allow opportunities for additional projects to be procured. First, the Company proposes a submission price refresh process, where fully evaluated bids

would be offered the opportunity to refresh their pricing such that the project will deliver benefits to all customers equal to the average total net benefit of the selected bids. Second, the Company proposes to extend the RFP period to allow for new projects to be submitted at prices that create net benefits equal to the average total net benefit of the selected portfolio, thus allowing interested customers to work with project developers to identify resources to fill those outstanding subscription needs. Proposals submitted as Customer Identified Resources ("CIRs") in Phase II will undergo a full economic and interconnection analysis by Georgia Power to ensure final pricing that secures additional renewable resources in a manner that preserves benefits and protects all customers.

Q. WHY HAS THE COMPANY PROPOSED ENHANCING ITS RENEWABLE PROCUREMENT STRATEGY?

A. Georgia Power recognizes the dynamic nature of the current energy landscape and proposes these modifications in response to customer needs, feedback from market participants, and recent RFP experience. This information confirms the need for additional flexibility in the Company's procurement strategy to navigate changing market conditions, including supply chain disruptions and changing policies.

Q. WHY IS MARKET FEEDBACK IMPORTANT, AND HOW DOES GEORGIA POWER TYPICALLY RECEIVE THAT FEEDBACK REGARDING ITS RENEWABLE PROCUREMENTS?

A. The Company, Staff, the Independent Evaluator ("IE"), and market participants have a long history of constructive and collaborative feedback processes that underpin the continuous improvement of procurement practices. This feedback remains critical to ensure a healthy and competitive procurement environment that attracts competent and committed counterparts to deliver low-cost renewable energy to the benefit of Georgia Power customers. Consistent with the Commission's RFP rules, each of the Company's RFPs offers potential bidders and interested parties the opportunity to provide comments and feedback on the RFP

process as well as on the draft RFP and pro forma contracts ("RFP Documents"). In addition to asking questions and providing comments, potential bidders and interested parties are encouraged to provide redline changes and proposed revisions to RFP and contract specific language during the comment period. Each comment received and proposed response is reviewed and discussed by the Company, Staff, and the IE. The Company regularly incorporates feedback from market participants appropriate for each RFP, as demonstrated by the evolution of the Company's RFP Documents over time. After the RFP concludes, Georgia Power offers unsuccessful bidders the opportunity to receive project specific feedback on the bids submitted into the RFP. Further, the Company regularly meets with market participants, including those that intervene in Georgia Power's IRPs on an individual or group basis, for additional feedback on the RFP process and trends to consider to enhance the overall success of the procurement process.

Q. HOW DOES THE COMPANY IMPLEMENT FEEDBACK RECEIVED ON ITS RFPS?

A. When providing suggestions and feedback specific to an active, ongoing RFP, the market participant's comments are reviewed and considered by Staff and the IE, in addition to the Company. This process allows for RFP, resource, and contract specific feedback to be considered and implemented within the context of the then-current resource procurement process. As evidenced by the enhancements proposed in our direct testimony and discussed above, the Company takes comments and feedback received through its RFPs seriously and, when deemed appropriate to provide additional value for customers, proposes modifications to address concerns raised. The Company also endeavors to adopt improvements made in one Georgia Power RFP across other RFPs, as well as from lessons learned in other jurisdictions, where appropriate. For example, after receiving feedback in the All Source, Winter BESS, and CARES 2023 RFPs, the Company proposed modifications to storage performance metrics to be implemented in each of the upcoming RFPs where storage resources could be procured, including the 500 MW Energy Storage System

RFP (approved in the 2022 IRP) and the CARES 2025 Utility Scale Renewable RFP.

Q. IS THE IRP THE PROPER FORUM TO CONSIDER SPECIFIC FEEDBACK ON THE COMPANY'S RFPS?

A. No. While the IRP is the appropriate place to consider high level decisions such as whether an RFP is needed or if fundamental changes, such as adding storage to renewable resources, should be made, it is not the appropriate forum for detailed RFP and contract specific feedback, which is better addressed within the context of each RFP. Advanced Power Alliance, the Southern Renewable Energy Association, Georgia Solar Energy Industries Association, and other Intervenors now attempt to use the IRP process to circumvent the existing RFP comment period and structure to get outsized and inappropriate influence to modify the Company's RFPs. To allow this would undermine the process set forth in the Commission's RFP Rules, which were designed to ensure transparency and fairness of the RFP to all participants. All potential bidders should have an equal opportunity to provide feedback, and the impacts of any changes should be considered across all potential bidders and interested parties. Circumventing the existing process could result in some market participants having more influence than others, undermining the intent of the Commission rules, since not all potential bidders and interested parties participate or are represented in the IRP process.

Q. WHAT ARE THE GOALS OF THE COMPETITIVE PROCUREMENT PROCESS, AND WHAT ARE GEORGIA POWER'S PRIORITIES IN DEVELOPING AND PROPOSING THE RFPS?

A. The competitive procurement process was created to ensure customers receive the best value from generation resources through careful evaluation of cost, risk and benefits delivered. In developing RFPs, the Company first and foremost complies with the Commission's rules and regulations. The Company uses the Commission-approved framework to design resource procurements aimed at ensuring reliable

resources are economically procured in a manner that protects customers. Many of the recommended revisions to the RFP process put forth in this IRP are being made by industry groups seeking to make the process more favorable to bidders and developers. These proposed changes would not serve to reduce risk in the generation development process but would instead shift those risks from developers to customers, undermining certainty and ultimately reducing the value delivered to customers.

Q. DOES THE COMPANY AGREE WITH STAFF'S PROPOSAL TO REDUCE THE AMOUNT OF ADDITIONAL SUM FOR RENEWABLE PROCUREMENTS?

A. No. Staff provided no evidence to support the proposed reduction in additional sum from $4/kW-yr to $3/kW-yr. The Company provided a detailed accounting to support a $7.50/kW-yr additional sum amount in the 2022 IRP and subsequently agreed to the $4/kW-yr amount as part of the stipulation in the 2022 IRP. The additional sum for renewable resources should remain at $4/kW-year.

Customer Identified Resource Option

Q. DOES THE COMPANY AGREE WITH CEBA'S RECOMMENDATION TO IMPLEMENT THE CUSTOMER IDENTIFIED RESOURCE OPTION ON AN UNCAPPED, ROLLING BASIS WITHOUT CONDUCTING A COMPETITIVE RFP?

A. No. Clean Energy Buyers association ("CEBA") Witnesses Barua and Alderfer propose, among other things, that the Company make CIRs available on a rolling basis, thereby bypassing the Commission-approved RFP process. As proposed by the Company, the CIR option operates as an extended RFP process, tied to a competitive solicitation, which ensures procurement of resources that benefit the entire system. It allows for potential project developers and potential CARES subscribers to work together to submit project proposals that provide total net

benefits that are greater than or equal to the portfolio average from the initial phase of the RFP (either Utility Scale or DG), delivering value to all Georgia Power customers consistent with the Commission's Rules. This process ensures that the additional resources are fully evaluated and studied, consistent with the Commission's rules and regulations, and that resources are acquired through the competitive procurement process, support system reliability, are cost effective, and beneficial to all customers, not just individual customers who may subscribe.

Q. HOW DOES THE COMPANY'S PROPOSED CUSTOMER IDENTIFIED RESOURCE PROCESS BENEFIT ALL CUSTOMERS?

A. As mentioned above, the CIR process as proposed is an extension of the competitive RFP and complies with Commission rules, as any project submitted will undergo full evaluation by the Company and will only be selected if deemed beneficial to all customers. These new projects are to be submitted at or below a price target that results in a Total Net Benefit that is greater than or equal to the average Total Net Benefit of the winning portfolio of resources from the Phase I procurement. By matching the price targets for CIRs to the average total net benefit procured in the RFP, the Company is ensuring that the resources provide value to all customers and that no costs are being shifted. As proposed by the Company, this option also ensures that if there is a difference between the term length of the subscribing customer agreement and the term of the supplying purchase power agreement, all customers stand to benefit from the fixed price energy after the subscribing customer agreement ends.

Q. IS THE COMPANY AMENABLE TO WORKING WITH CUSTOMERS TO DEVELOP ADDITIONAL RESOURCE OR PROGRAM PROPOSALS TO HELP ADDRESS THEIR NEEDS FOR RENEWABLE AND CARBON FREE ENERGY?

A. Yes. As discussed in Section 10.5 of the 2025 IRP Main Document, in addition to the new programs and program enhancements described above, the Company is

exploring various innovative solutions related to renewable and carbon free energy resources to help address customers' needs. These include, for example, technologies that support grid reliability with changing generation dynamics, carbon-free capacity resources like advanced nuclear, and long-duration energy storage. Georgia Power is also engaging with stakeholders to foster a collaborative approach to evaluate and refine such solutions, while ensuring that all initiatives deliver both System reliability and economic benefits for all customers. Once viable concepts are identified and vetted with potential participants, the Company will seek Commission approval of such solutions.

IV. CUSTOMER PROGRAMS

Solar + Storage Pilot Program

Q. PLEASE BRIEFLY EXPLAIN THE PROPOSED RESIDENTIAL AND SMALL COMMERCIAL SOLAR + STORAGE PILOT PROGRAM.

A. The Company has proposed two complimentary pathways by which the Company will incentivize the addition of storage resources that can be utilized by the Company to meet System needs. In the Company Directed pathway, participants will receive an upfront incentive for a 10-year contract granting Georgia Power continuous operation of a customer-sited storage resource. In the Customer Directed pathway, Georgia Power will offer participants a smaller annual enrollment incentive for participation and pay additional performance-based incentives during discrete event calls.

Q. DID GEORGIA POWER INCORPORATE FEEDBACK FROM INTERVENORS INTO THE PROPOSED PILOT DESIGN?

A. Yes. As acknowledged by Staff Witnesses Barber, Kaduk, and Bower, interested parties were given an opportunity to present on potential design options, best practices, and size considerations, and specific program elements suggested by

interested parties were incorporated.[7] In addition to the sessions hosted at the Commission, the Company met, and continues to meet, with manufacturers, developers, implementors and other stakeholders.

Q. IS THE COMPANY WILLING TO ADOPT ANY ADDITIONAL RECOMMENDATIONS SUGGESTED BY INTERVENORS IN THIS PROCEEDING?

A. Yes. The Company proposes to adopt several of the recommendations put forth by Staff and other Intervenors. First, the Company will remove the restriction on grid charging in the Company Directed pathway. Second, the Company will endeavor to avoid calling on resources in advance of widespread extreme weather. In addition, the Company will commit to offering a Customer Directed option for a 10-year term. Finally, the Company will work with its program implementer, once selected, to offer a publicly accessible dashboard of enrolled MW to provide information on pilot status.

Q. DOES THE COMPANY BELIEVE THAT THE INCENTIVE STRUCTURE AND LEVELS SHOULD BE MODIFIED BASED ON INTERVENOR FEEDBACK?

A. No, not at this time. The proposed pilot program features a hybrid of upfront and ongoing incentives that are straightforward and calculated based on the forecasted avoided generation capacity value associated with assets participating in each pathway. Intervenors suggested competing modifications to the Company's incentive structure. For example, Georgia Solar Energy Association ("GA Solar") Witness Hoyt advocates for removing the annual enrollment incentive,[8] while Georgia Coalition of Local Governments ("Coalition") Witness Richetta recommends providing annual participation incentives in the Company Directed

[7] Direct Testimony of Jamie Barber, John Kaduk, and Jeffrey D. Bower, Docket Nos. 56002 & 56003 (May 5, 2025) at 49:15, 52:7.
[8] Direct Testimony of Adam Hoyt, Docket Nos. 56002 & 56003 (May 2, 2025) at 46:22–24.

option.[9] The Company's proposed structure is a fair and reasonable design that will enable learnings on customer response and system benefit.

Q. ARE THERE OTHER AREAS IN WHICH INTERVENORS PROVIDED CONFLICTING RECOMMENDATIONS?

A. Yes. Coalition Witness Richetta testified that Sonnen has successful programs around the world where a utility continuously operates the battery.[10] Other Intervenors suggested that they did not believe customers would enroll in the Company Directed option or they proposed limits on the Company use.

Q. PLEASE RESPOND TO THE RECOMMENDATION TO ALLOW PARTICIPANTS TO TAKE SERVICE ON ENERGY-ONLY RATES.

A. Staff and other Intervenors are concerned that the Company will not allow participants to take service under the Company's energy-only rates—GS and R—on the basis that it may be a barrier to participation. GA Solar Witness Pertwee states that under the Company Directed pathway, customers cannot respond themselves to the price signals.[11] However, the proposed ineligible rates have no TOU or demand price signals to which a customer could respond receive benefit from. Even if the Company Directed dispatch does not perfectly align with TOU periods, the rate signals and dispatch are likely to be highly correlated and thus generate additional economic benefit for customers. Further, the Company maintains the position that energy only rates do not provide for complete recovery of system costs for customers with behind the meter solar generation, thus shifting the recovery of fixed costs to other customers.

[9] Direct Testimony of Blake F. Richetta, Docket Nos. 56002 & 56003 (May 2, 2025) ("Richetta") at 21:10–18.
[10] Tr. 254 (Intervenor Hearing Day 2).
[11] Direct Testimony of Daniel Pertwee, Docket Nos. 56002 & 56003 (May 2, 2025) at 38:20–25.

Q. WHY DID THE COMPANY PROPOSE A SYSTEM SIZE LIMIT OF 20 KW FOR RESIDENTIAL SYSTEMS IN THE SOLAR PLUS STORAGE PILOT PROGRAM?

A. The Company proposed a 20 kW residential limit to enable an efficient enrollment and interconnection process including assurances of the safe and reliable operation of existing equipment used to serve customers and minimizing additional cost to customers due to upgrades that might be required to support systems above 20 kW.

Q. WHAT IS THE COMPANY'S RATIONALE FOR MAINTAINING THE 20 KW LIMIT?

A. The Company does not believe that a 20 kW limit will be a limiting factor for the majority of customers based on installed solar system sizes to date. Examples cited to support a higher limit utilized systems that were oversized relative to the load of the home. A size limit is beneficial to discourage the sale and installation of systems much larger than the customer load. In addition, discussions of the ability for Tesla Powerwall 3s to participate conflated the ability to add additional storage capacity with additional export capability. Several Intervenors suggested the Company could manage systems without a limit using inverter settings, software controls, or relying on the improbability of solar and batteries discharging at nameplate together. These are examples of the types of solutions and data the Company can monitor and evaluate as part of a pilot program.

Q. WHY IS IT NOT FEASIBLE TO EVALUATE SYSTEM SIZE ON A CASE-BY-CASE BASIS AS RECOMMENDED BY CAPITAL GOOD FUND WITNESS BATES?

A. In addition to the reasons discussed above, the Company included a system cap for the proposed program to streamline evaluations and analyses that are part of the interconnection process. To completely remove the system cap and instead evaluate each system on a case-by-case basis would result in an administrative burden and

significant expenditure of Company time and resources, which would ultimately slow down program implementation and the interconnection process.

Q. WERE STAFF AND INTERVENORS ULTIMATELY SUPPORTIVE OF THE RESIDENTIAL AND SMALL COMMERCIAL SOLAR PLUS STORAGE PILOT?

A. Yes. While many had recommendations, all Intervenors who commented were supportive of the pilot offering.

Virtual Power Plants

Q. PLEASE RESPOND TO THE RECOMMENDATION FROM SEVERAL INTERVENORS THAT THE COMPANY IMPLEMENT A VIRTUAL POWER PLANT PLATFORM.

A. Georgia Power recognizes the importance of integrating a variety of DERs. With Georgia Power's robust portfolio of existing and proposed customer programs and distributed energy resource management system ("DERMS") implementation, the Company is already taking actions and advancing investments that are consistent with this recommendation, so no further action or requirement from the Commission is needed. Georgia Power appreciates the robust participation and interest displayed by Intervenors and other stakeholders in continuing to leverage emerging technologies for the benefit of all customers and will continue to evaluate DERs, load flexibility, and associated technology platforms in its planning process.

CARES Subscription Program

Q. PLEASE BRIEFLY DESCRIBE THE COMPANY'S PROPOSED MODIFICATIONS TO THE CARES PROGRAM.

A. In addition to expanding the CARES program to DG procurements and the introduction of the CIR option, the Company proposes refinements to the notice of intent ("NOI") process, and an updated pricing methodology for the hourly energy credit to reduce financial risks to non-participating customers.

Q. WHAT DO INTERVENORS RECOMMEND REGARDING THE CARES PROGRAM HOURLY ENERGY CREDITS?

A. CEBA Witnesses Barua and Alderfer and Coalition Witness Nifong both recommend that the CARES hourly energy credits remain uncapped.[12]

Q. DOES THE COMPANY HAVE CONCERNS WITH THE RECOMMENDATION TO LEAVE THE HOURLY ENERGY CREDITS UNCAPPED?

A. Yes. Georgia Power proposes to update the CARES pricing methodology and introduce reimbursement thresholds to ensure fairness to all customers and prevent negative impacts to nonparticipants. CEBA and the Coalition's recommendation that there is no need to implement limits on potential credits ignores the possibility that hourly energy credits could exceed the subscription price paid by CARES participants, negatively impacting all other customers.

[12] Direct Testimony of Priya Barua and R. Brent Alderfer, Docket Nos. 56002 & 56003 (May 2, 2025) ("Barua & Alderfer") at 49:3; Direct Testimony of David A. Nifong, Docket Nos. 56002 & 56003 (May 2, 2025) at 16:7–17.

Q. WHY SHOULD THE COMMISSION APPROVE THE COMPANY'S PROPOSED MODIFICATIONS?

A. The proposed enhancements to CARES, including CIRs, provide options to customers interested in securing attributes generated from renewable resources to help meet individual customer goals. The CARES program is designed to offer a fair-value proposition to those potential subscribers in a way that also delivers benefits to non-participating customers. The proposed CIR enhancements offer additional options to allow new, incremental resources to be added to the system, above and beyond Commission-approved targets. Accordingly, the proposed CARES program design strikes the right balance between providing value to subscribers and protecting non-participating customers and will enable continued, measured, and steady renewable growth.

Q. PLEASE RESPOND TO CEBA WITNESSES BARUA AND ALDERFER'S RECOMMENDATION THAT THE COMPANY OFFER CAPACITY SUBSCRIPTIONS.

A. CEBA Witnesses Barua and Alderfer recommend that the Company offer customer subscriptions that provide a capacity credit in addition to an energy credit.[13] Because Georgia Power procures capacity for the benefit of all customers, it runs contrary to the regulatory compact and could be harmful to existing customers for Georgia Power to offer a capacity subscription for a capacity resource to a single customer. Georgia Power is committed to accurately reflecting the value these resources bring to the system, including capacity value, but does not offer capacity subscriptions, instead offering subscriptions to the carbon free attributes renewable resources deliver. Georgia Power will continue to evaluate the capacity benefits created by solar and solar and storage resources to ensure proper allocation of costs and benefits to generators and subscribing customers.

[13] Barua & Alderfer at 31:19–22.

V. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.