

June 12, 2025

VIA ELECTRONIC DELIVERY

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

Re: Direct Testimony on Behalf of Georgia Interfaith Power & Light; Docket No. 44280

Dear Ms. Tanner:

Please find enclosed an electronic version of the following Direct Testimony of Justin Barnes on behalf of Georgia Interfaith Power & Light to be filed in Docket No. 44280. At this time GIPL requests that it be allowed to present Mr. Barnes' testimony via Zoom at the June 26th hearing.

Respectfully submitted,



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Southern Environmental Law Center
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Counsel for GIPL

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:)
)
Georgia Power Company's) Docket No. 44280
2022 Rate Case)

DIRECT TESTIMONY OF JUSTIN BARNES ON BEHALF OF
GEORGIA INTERFAITH POWER & LIGHT

June 12, 2025

1 **Q: PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

2 A: Justin R. Barnes. My business address is 1155 Kildare Farm Road, Suite 202, Cary, North
3 Carolina 27511. My current position is President of EQ Research LLC.

4 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CASE?**

5 A: Georgia Interfaith Power and Light (“GIPL”).

6 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

7 A: I was asked to review the Stipulation and Petition to Extend the Alternate Rate Plan
8 (“ARP”) filed jointly in this docket by Georgia Power Company and Public Service
9 Commission Public Interest Advocacy (“PIA”) Staff on May 19, 2025. I was asked to
10 evaluate the likelihood and extent of the risk that residential and small commercial
11 customers would subsidize new and expanding large load customers like data centers.
12 However, with the scant information available for review in this proceeding,¹ I am unable
13 to offer an opinion at this time.

14 Relatedly, I was asked to identify information that would be necessary to evaluate
15 the cost allocation impacts of new large loads in Georgia as described in Paragraph 15 of
16 the Stipulation to Extend the ARP. My testimony and recommendations speak specifically
17 to a portion of Staff’s testimony in support of the Stipulation to extend the Company’s ARP
18 extension, which states:

19 Second, the State of Georgia, and most States, are experiencing a potential
20 for unprecedented economic growth for electric services because of
21 forecasted large load data centers. This Stipulation provides all stakeholders
22 an opportunity to evaluate any actual, realized growth from these data

¹ GIPL requested supporting information necessary to evaluate the Stipulation on May 21 for which it received no response. *See* Request for Supporting Documentation, Docket No. 44280 (May 21, 2025). Further, PSC staff sent Georgia Power a single data request on June 6 requesting the “assumptions and inputs” used in Georgia Power’s May 30 filing. That basic information is not due until July 7, 2025—six days after the Commission’s final decision in this proceeding. Data Request STF-PIA-30.

1 centers as opposed to attempting to forecast the consequences. Due to the
2 Stipulation, the base rate case that will be filed in July of 2028, will be much
3 more grounded in substance than forecasts, which allows for more confident
4 decision making for the future.²

5 The various information that I recommend Georgia Power be directed to track will
6 help ensure that analyses conducted in the next base rate case can reliably be “grounded in
7 substance.” Furthermore, ongoing evaluation of new data and other analyses as they
8 become available would be highly useful for avoiding potential “surprises” further down
9 the road at the conclusion of the extended ARP proposed in the Stipulation. However, due
10 to time and information constraints, I am unable to provide an exhaustive list of all the
11 types of relevant information that may be needed.

12 **Q: PLEASE IDENTIFY THAT ESSENTIAL INFORMATION GEORGIA POWER**
13 **SHOULD TRACK FOR COMMISSION REVIEW.**

14 **A:** After reviewing the Stipulation and Petition, the testimony filed by Georgia Power and PIA
15 Staff, and prior document requests and responses, I have identified the following
16 information as essential to an adequate review of cost allocation for the costs relating to
17 new and expanding large load customers and to ensure that such customers are not
18 subsidized by existing residential and small commercial Georgia Power customers:

- 19 1. **Load Data:** Forecasted and actual hourly (8,760) load data for all rate classes and
20 individual rate schedules starting in 2024 using a 3-year forecast and 1-year actual
21 format. For example, the 2024 dataset would include a 3-year forecast from 2025-2027
22 and actual 2024 data, while the 2025 dataset would reflect a 2026-2028 forecast and
23 actual 2026 data.

² Direct Testimony of Tom Bond and Steve Roetger, Docket No. 44280 (May 30, 2025) at 6:21-7:4.

- 1 2. **Generation Data:** Forecasted and actual hourly (8,760) generation data for each
2 generation unit starting in 2024 using a 3-year forecast and 1-year actual format. For
3 example, the 2024 dataset would include a 3-year forecast from 2025-2027 and actual
4 2024 data, while the 2025 dataset would reflect a 2026-2028 forecast and actual 2025
5 data.
- 6 3. **RTP Energy Pricing Data:** The hourly (8,760) prices charged to customers enrolled in
7 the Day-Ahead (Schedule RTP-DA) and Hour-Ahead (Schedule RTP-HA) marginally
8 priced rate schedules each year starting in 2024, broken down by individual price
9 component for marginal energy, environmental, transmission, and reliability capacity
10 costs.
- 11 4. **New Data Center Loads:** For each large load customer that commenced electric service
12 or expanded the load of their electric service, after July 31, 2023 (“covered
13 customers”), the following information:
- 14 a. The full contents of all Ratepayer Impact Measure (“RIM”) test analyses that
15 were conducted as a precursor to service commencement and any expansion of
16 service by a covered customer, inclusive of all associated workpapers.
- 17 b. The date that a covered customer commenced electric service, or where
18 applicable, expanded their electric service.
- 19 c. The rate schedule that applied to the covered customer’s Customer Baseline
20 Load (“CBL”) each month starting August 1, 2023.
- 21 d. The duration of the covered customer’s electric service contract.

- e. The Monthly Access Charge (“MAC”) levied during each month on the covered customer starting August 1, 2023, and workpapers documenting the calculation of the MAC.
- f. The amount of the covered customer’s monthly minimum bill according to the terms of their electric service contract during each month starting August 1, 2023.
- g. The covered customer’s projected and actual non-coincident peak load for each month starting August 1, 2023.
- h. The covered customer’s projected and actual coincident peak load for each month starting August 1, 2023.
- i. The covered customer’s projected and actual energy usage during each month starting August 1, 2023.
- j. The amount of energy purchased under RTP rates and the amount of energy purchased at the rate applicable to the covered customer’s CBL starting August 1, 2023.

5. *Illustrative Cost of Service Analyses*: An illustrative fully distributed cost of service study (“COSS”) each year starting with 2024 using a 2024 test year, conducted according to the Company's currently accepted cost of service methodologies.

Q: DOES THE PROPOSED STIPULATION FOR EXTENDING THE ARP ADEQUATELY ACCOUNT FOR MAKING AVAILABLE THE INFORMATION THAT YOU HAVE DESCRIBED?

A: No. The relevant text of the Stipulation reads as follows:

1 In addition to filing a Cost-of-Service Study as a part of its next base rate
2 case, the Company shall include additional Cost-of-Service data with
3 sufficient detail to show how the Company proposes to allocate the
4 forecasted costs relating to the new capacity for large load customers at
5 issue in the 2023 Amended Integrated Resource Planning (“IRP”) case and
6 the 2025 IRP case, as well as the forecasted revenues from the prospective
7 new large load customers at issue in those cases, to the various customer
8 rate groups.

9 I do not object to the apparent intent behind this aspect of the Stipulation, but the
10 information that it requires is limited and vague. For instance, it only requires the Company
11 to provide details of how the Company proposes to allocate the forecasted costs of new
12 capacity for large load customers. That information, while critically important, is not
13 sufficient to support a complete analysis of how large new loads affect the Company’s
14 system and its operation over time, nor would it provide the data necessary for
15 stakeholders, include Commission Staff, to develop alternative allocation structures that
16 may be warranted based on such analysis. Likewise, an aggregate forecast of revenues from
17 prospective new large load customers does not by itself allow stakeholders to fully
18 understand how the forecast was developed, including how it relates to or reflects past
19 experience with the realization of new large loads and the accompanying uncertainties
20 involved.

21 **Q: PLEASE FURTHER EXPLAIN YOUR RECOMMENDATION REGARDING THE**
22 **COLLECTION AND AVAILABILITY OF LOAD DATA AND ITS IMPORTANCE.**

23 **A:** Load data is the foundation of cost allocation. The annual time series of load data that I
24 recommend be made available would allow general trends and inflection points to be
25 examined in a more granular manner than is possible in “snapshots” of test years separated
26 by multiple interim years. The inclusion of a rolling time series of forecasted and actual

1 loads would also provide insights into how well the Company is able to predict the amount
2 and shape of future loads that influence resource planning and cost allocation, and could
3 point to necessary refinements to both.

4 **Q: PLEASE FURTHER EXPLAIN YOUR RECOMMENDATION REGARDING THE**
5 **AVAILABILITY OF UNIT-LEVEL GENERATION DATA AND ITS**
6 **IMPORTANCE.**

7 A: Unit-level generation data shows how the Company's system is adapted to serve new loads
8 as they materialize, including both new generation and modifications to the operation of
9 existing generation. When married with equivalent data on customer loads, unit-level
10 generation data can provide an understanding of how new loads use system resources on a
11 time-differentiated basis. Among other things, this speaks to Staff's testimony in the 2025
12 IRP discussing the Company's projections of increased marginal energy costs and the
13 supposition that those increases could be associated with increased utilization of relatively
14 less efficient generation units to serve new loads.³ As with load data, a combination of
15 forecasted and actual time series data would be valuable for analyzing forecast accuracy,
16 which is an important input into resource planning and cost allocation.

17 **Q: PLEASE EXPLAIN THE IMPORTANCE OF THE AVAILABILITY OF**
18 **HISTORIC RTP PRICING DATA.**

19 A: It is likely that a significant portion of, and perhaps all, large new loads will elect or be
20 required to take RTP service. In order to understand revenue projections relative to cost of
21 service, it is necessary to have visibility into the details of the pricing mechanism that

³ Direct Testimony of Robert Stephens, Docket Nos. 56002 & 56003 (May 5, 2025) at 11:17-13:2.

1 would produce a significant portion of that revenue, as well as the components thereof.
2 Without that data, it is not possible to discern exactly how large new loads are, or will be,
3 charged for the costs that they cause to be incurred in the form of new investments or how
4 those charges compare to their cost of service. In addition, the RTP price history is an
5 essential element for evaluating participant response to price signals and how those
6 responses influence current and future system costs.

7 **Q: PLEASE FURTHER EXPLAIN YOUR RECOMMENDATION REGARDING THE**
8 **AVAILABILITY OF DATA REGARDING NEW LARGE LOADS.**

9 A: This type of data is necessary to characterize how incremental increases in realized new
10 data center loads influence system operations (e.g., generator dispatch and costs), allocated
11 costs, and the calculation of accompanying revenues from those new loads. In order to
12 understand the patterns of changes in system costs and expected revenues, it is important
13 to have a granular history of significant changes in load and revenue. The provision of RIM
14 test analyses and associated calculations likewise is central to understanding the
15 Company's assumptions regarding how such new loads will impact costs and revenues in
16 future years. I specified August 1, 2023 as a threshold date because the Company's 2022
17 general rate case used an August 2022 – July 2023 test year.

18 **Q: PLEASE FURTHER EXPLAIN WHY YOU RECOMMEND THAT THE**
19 **COMPANY DEVELOP ANNUAL ILLUSTRATIVE COSS BASED ON THEIR**
20 **MOST RECENTLY APPROVED METHODOLOGIES.**

21 A: As Staff discussed in their testimony in the 2025 IRP proceeding, even if average system
22 costs decline as a consequence of new data center loads, the distribution of any such cost

1 saving benefits could be spread unevenly across customer classes.⁴ Requiring the Company
2 to provide cost of service analysis during the interim period between now and the 2028 rate
3 case would provide the Commission and stakeholders with valuable information on trends
4 over time as new data center load materializes and the Company's system is evolved to
5 serve that demand. Examining this information in concert with the data that I previously
6 discussed regarding new data center loads and revenue would permit the cost of service
7 implications of changes in data center load and non-data center load to be isolated from
8 one another. My recommendation that the Company be directed to provide an illustrative
9 COSS starting with a 2024 test year is intended to establish an up-to-date baseline.

10 . . .

11 **Q: MR. BARNES, PLEASE SUMMARIZE YOUR EDUCATIONAL AND**
12 **PROFESSIONAL EXPERIENCE.**

13 A: I obtained a Bachelor of Science in Geography from the University of Oklahoma in
14 Norman in 2003 and a Master of Science in Environmental Policy from Michigan
15 Technological University in 2006. I was employed at the North Carolina Solar Center (now
16 known as the North Carolina Clean Energy Technology Center) at N.C. State University
17 for more than five years as a Policy Analyst and Senior Policy Analyst. During that time I
18 worked on the Database of State Incentives for Renewables and Efficiency project, and
19 several other projects related to state renewable energy and energy efficiency policy. I
20 joined EQ Research in 2013 as a Senior Analyst, became the Director of Research in 2015,
21 and President in 2023. In my current position, I oversee, coordinate, and contribute to EQ

⁴ Direct Testimony of Ralph Smith and Jason Forsythe, Docket Nos. 56002 & 56003 (May 5, 2025) at 20:13-22:20.

1 Research's various state clean energy policy subscription products and oversee and
2 perform customized research and analysis to fulfill client requests.

3 **Q. PLEASE DESCRIBE SOME OF YOUR EXPERTISE IN ISSUES RELEVANT TO**
4 **THIS PROCEEDING.**

5 A. My professional career has been spent researching and analyzing numerous aspects of
6 federal and state energy policy, spanning more than a decade. Throughout that time, I have
7 reviewed and evaluated trends in electric regulatory policy and ratemaking, covering topics
8 that include cost of service evaluation, resource planning, cost-effectiveness analysis, and
9 rate design, among others. For example, I oversaw the design and development of EQ
10 Research's integrated resource planning ("IRP") and data center developments
11 subscription products and I have reviewed dozens of general rate cases as part of my
12 oversight of EQ Research's general rate case tracking service.

13 Outside of Georgia, I have submitted testimony before utility regulatory commissions in
14 Colorado, Hawaii, Indiana, Kentucky, Michigan, New Hampshire, New Jersey, New
15 Mexico, New York, North Carolina, Oklahoma, South Carolina, Texas, Utah, Virginia,
16 West Virginia, and Wisconsin, as well as to the City Council of New Orleans.⁵ These
17 individual regulatory proceedings have involved a mix of general rate cases and other types
18 of contested cases. My curriculum vitae is attached as Exhibit JRB-1. It contains summaries
19 of the subject matter I have addressed in each of these proceedings.

⁵ The New Orleans City Council regulates Entergy New Orleans, an electric utility, in a manner equivalent to state utility commissions.

1 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE GEORGIA PUBLIC**
2 **SERVICE COMMISSION?**

3 A. Yes. I testified in the 2019 Georgia Power Company rate case, Docket No. 42516, and in
4 the 2022 Georgia Power Company rate case, Docket No. 44280.

5 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

6 A: Yes, it does.

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:)	
)	
Georgia Power Company's)	Docket No. 44280
2022 Rate Case)	

EXHIBIT JRB-1

JUSTIN R. BARNES

(919) 825-3342, jbarnes@eq-research.com

EDUCATION

Michigan Technological University Houghton, Michigan

Master of Science, Environmental Policy, August 2006
Graduate-level work in Energy Policy.

University of Oklahoma Norman, Oklahoma

Bachelor of Science, Geography, December 2003
Area of concentration in Physical Geography.

RELEVANT EXPERIENCE

President, May 2023 – present

Director of Research, July 2015 – April 2023

Senior Analyst & Research Manager, March 2013 – July 2015

EQ Research, LLC Cary, North Carolina

- Oversee state legislative, regulatory policy, utility IRP and general rate case tracking services that covers policies such as net metering, interconnection standards, rate design, renewables portfolio standards, state energy planning, state and utility incentives, tax incentives, and permitting. Responsible for service design, formulating improvements based on client needs, and ultimate delivery of reports to clients. Expanded service to cover energy storage.
- Oversee and perform policy research and analysis to fulfill client requests, and for internal and published reports, focused primarily on drivers of distributed energy resource (DER) markets and policies.
- Provide expert witness testimony on topics including cost of service, rate design, distributed energy resource (DER) value, and DER policy including incentive program design, rate design issues, and competitive impacts of utility ownership of DERs.
- Managed the development of a solar power purchase agreement (PPA) toolkit for local governments, a comprehensive legal and policy resource for local governments interested in purchasing solar energy, and the planning and delivery of associated outreach efforts.

Senior Policy Analyst, January 2012 – May 2013;

Policy Analyst, September 2007 – December 2011

North Carolina Solar Center, N.C. State University Raleigh, North Carolina

- Responsible for researching and maintaining information for the Database of State Incentives for Renewables and Efficiency (DSIRE), the most comprehensive public source of renewables and energy efficiency incentives and policy data in the United States.
- Managed state-level regulatory tracking for private wind and solar companies.
- Coordinated the organization's participation in the SunShot Solar Outreach Partnership, a U.S. Department of Energy project to provide outreach and technical assistance for local governments to develop and transform local solar markets.
- Developed and presented educational workshops, reports, administered grant contracts and associated deliverables, provided support for the SunShot Initiative, and worked with diverse group of project partners on this effort.
- Responsible for maintaining the renewable portfolio standard dataset for the National Renewable Energy Laboratory for use in its electricity modeling and forecasting analysis.
- Authored the *DSIRE RPS Data Updates*, a monthly newsletter providing up-to-date data and historic compliance information on state RPS policies.



- Responded to information requests and provided technical assistance to the general public, government officials, media, and the energy industry on a wide range of subjects, including federal tax incentives, state property taxes, net metering, state renewable portfolios standard policies, and renewable energy credits.
- Extensive experience researching, understanding, and disseminating information on complex issues associated with utility regulation, policy best practices, and emerging issues.

SELECTED ARTICLES and PUBLICATIONS

- EQ Research and Synapse Energy Economics for Delaware Riverkeeper Network. *Envisioning Pennsylvania's Energy Future*. 2016.
- Barnes, J., R. Haynes. *The Great Guessing Game: How Much Net Metering Capacity is Left?*. September 2015. Published by EQ Research, LLC.
- Barnes, J., Kapla, K. *Solar Power Purchase Agreements (PPAs): A Toolkit for Local Governments*. July 2015. For the Interstate Renewable Energy Council, Inc. under the U.S. DOE SunShot Solar Outreach Partnership.
- Barnes, J., C. Barnes. *2013 RPS Legislation: Gauging the Impacts*. December 2013. Article in Solar Today.
- Barnes, J., C. Laurent, J. Uppal, C. Barnes, A. Heinemann. *Property Taxes and Solar PV: Policy, Practices, and Issues*. July 2013. For the U.S. DOE SunShot Solar Outreach Partnership.
- Kooles, K, J. Barnes. *Austin, Texas: What is the Value of Solar; Solar in Small Communities: Gaston County, North Carolina; and Solar in Small Communities: Columbia, Missouri*. 2013. Case Studies for the U.S. DOE SunShot Solar Outreach Partnership.
- Barnes, J., C. Barnes. *The Report of My Death Was An Exaggeration: Renewables Portfolio Standards Live On*. 2013. For Keyes, Fox & Wiedman.
- Barnes, J. *Why Tradable SRECs are Ruining Distributed Solar*. 2012. Guest Post in Greentech Media Solar.
- Barnes, J., multiple co-authors. *State Solar Incentives and Policy Trends*. Annually for five years, 2008-2012. For the Interstate Renewable Energy Council, Inc.
- Barnes, J. *Solar for Everyone?* 2012. Article in Solar Power World On-line.
- Barnes, J., L. Varnado. *Why Bother? Capturing the Value of Net Metering in Competitive Choice Markets*. 2011. American Solar Energy Society Conference Proceedings.
- Barnes, J. *SREC Markets: The Murky Side of Solar*. 2011. Article in State and Local Energy Report.
- Barnes, J., L. Varnado. *The Intersection of Net Metering and Retail Choice: an overview of policy, practice, and issues*. 2010. For the Interstate Renewable Energy Council, Inc.

TESTIMONY & OTHER REGULATORY ASSISTANCE

West Virginia Public Service Commission. Case No. 24-0854-E-42T. April 2025. On behalf of the West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia. Appalachian Power Company and Wheeling Power Company general rate case application. Addressed issues that included the utilities' proposed elimination of net metering and related issues of subsidization, the Companies' overarching alternative ratemaking and cost tracker proposals, post-test year rate base adjustments, demand limits within the small commercial rate schedule, refinements to the design of the Companies' residential TOU rates and LED lighting rates, and various issues related to low-income energy burdens, including assistance programs and rate design.

New Mexico Public Regulation Commission. Case No. 24-00089-UT. January 2025. On behalf of the Coalition for Community Solar Access. Public Service Company of New Mexico. Testimony in support of a Stipulation regarding the appropriate functionalization of rate impact banding adjustments as related to the calculation of the community solar subscriber credit.



Michigan Public Service Commission. Case No. U-21534. July 2024. On behalf of the Michigan Energy Innovation Business Council and The Institute for Energy Innovation. DTE Electric Company general rate case application. Sponsored testimony recommending revisions to the utility's proposed time-varying rate options for non-residential customers addressing issues including revenue-neutral rate schedule mapping, appropriate pricing windows, enrollment caps, implementation timeline, and customer outreach and tools.

Indiana Utility Regulatory Commission. Cause No. 45990. March 2024. On behalf of the Citizen's Action Coalition of Indiana. Centerpoint Indiana South generation rate case application. Addressed: (a) numerous cost of service and cost allocation issues associated with production plant, transmission plant, coal ash disposal, MISO expenses, and service advertisement expenses; (b) cost-shifting caused by special contract customers and customers served under an industrial back-up service rate; and (c) the proper calculation of a residential customer charge based on customer-related costs.

West Virginia Public Service Commission. Case No. 23-0460-E-42T. November 2023. On behalf of the West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia. Monongahela Power and Potomac Edison general rate case application. Addressed issues that included the utilities' proposed elimination of net metering and related issues of subsidization, the methodology for setting monthly customer charges, demand limits within the small commercial rate schedules, piloting non-residential TOU rates, distribution cost allocation, the utilities' proposed distribution infrastructure investment program and long-term distribution planning, and support mechanisms for reducing energy burdens on low-income customers.

New Mexico Public Regulation Commission. Case No. 23-00071-UT. November 2023. On behalf of the Coalition for Community Solar Access. New Mexico community solar tariffs implementation proceeding. Addressed the methodology for quantifying any subsidy provided to community solar participants, the calculation of the community solar subsidy cap associated with the New Mexico's community solar law, the utilities' proposed administrative cost riders, and the utilities' proposed community solar eligibility restrictions.

Michigan Public Service Commission. Case No. U-21297. June 2023. On behalf of the Michigan Energy Innovation Business Council and The Institute for Energy Innovation. DTE Electric Company general rate case application. Sponsored a proposal for the establishment of time-varying rate options for non-residential customers.

North Carolina Utilities Commission. Docket Nos. E-34 Sub 54 and Sub 55. June 2023. On behalf of Appalachian Voices. New River Light and Power general rate case application. Analyzed the utility's proposal to establish NEM with a supplemental standby charge based on an evaluation of customer-sited solar costs and benefits and the utility's proposal for an increase in the residential fixed charge. Recommended the elimination of the DG standby charge based on corrections to NRLP's solar value analysis and a decrease in the residential fixed charge based on revised calculations of customer-related costs.

Georgia Public Service Commission. Docket No. 44280. Direct Testimony in October 2022 and Supplemental Testimony in November 2022. On behalf of Georgia Interfaith Power and Light. Georgia Power Company general rate case application. In Direct Testimony, provided a review and analysis of the cost allocation regime for coal combustion residual costs and provided recommended changes thereto; and evaluated the Company's proposals designed to shift residential customers to service under demand rate designs, including general analysis of the cost causation basis for demand rates and specific attributes and Company experience with its residential demand rate. In Supplemental Testimony, evaluated the Company's proposal to end its monthly netting DG tariff (i.e., NEM) and require mandatory demand rate service for future DG customers and recommended that NEM be retained without a mandatory demand



rate requirement based on analysis demonstrating that doing so would not adversely affect non-DG customers.

Wisconsin Public Service Commission. Docket No. 5-UR-110. September 2022. On behalf of RENEW Wisconsin. Wisconsin Electric Power Company general rate case application. Provided an exhibit showing residential fixed charges among all major IOUs in the nation and testimony explaining the methodology used to develop the exhibit.

Wisconsin Public Service Commission. Docket No. 6690-UR-127. September 2022. On behalf of RENEW Wisconsin. Wisconsin Public Service Corporation general rate case application. Provided an exhibit showing residential fixed charges among all major IOUs in the nation and testimony explaining the methodology used to develop the exhibit.

Wisconsin Public Service Commission. 3270-UR-124. September 2022. On behalf of RENEW Wisconsin. Madison Gas and Electric general rate case application. Provided an exhibit showing residential fixed charges among all major IOUs in the nation and testimony explaining the methodology used to develop the exhibit. *(Note: Exhibit was introduced at the hearing and testimony on the methodology provided orally at the hearing; written testimony was not filed).*

Michigan Public Service Commission. Case No. U-20836. May 2022. On behalf of the Michigan Energy Innovation Business Council and The Institute for Energy Innovation. DTE Electric Company general rate case application. Addressed the utility's proposal for changes to its DG Tariff, including excluding generation capacity value from the export rate and requiring DG customers to take service under a newly proposed residential demand rate. Also evaluated the cost causation and other rate attributes of the proposed residential demand rate.

Virginia State Corporation Commission. Docket No. PUR-2021-00171. January 2022. On behalf of Appalachian Voices. Old Dominion Power Company general rate case application. Evaluation of the cost basis for the residential customer charge, AMI deployment and the timeline for deployment of TOU rates, class allocation of distribution and production demand costs, and the Company's proposal for a DSM/EE pilot program and cost recovery rider.

Michigan Public Service Commission. Case No. U-20963. June 2021. On behalf of the Michigan Energy Innovation Business Council and the Institute for Energy Innovation. Consumers Energy Company general rate case. Provided an evaluation of the utility's proposed home battery program and offered recommendations for modifications to the program to improve its cost-effectiveness and delivery of benefits to participants and non-participants through changes to battery operational plans, elimination of restrictions on consumer use of the batteries, battery sizing modifications to fit actual customer needs, and use of solar-paired storage to provide greater resiliency.

Colorado Public Utilities Commission. Proceeding No. 20AL-0432E. March 2021. On behalf of the Colorado Solar and Storage Association and the Solar Energy Industries Association. Public Service Company of Colorado (Xcel Energy Colorado) general rate case. Provided analysis and recommendations on several non-residential rate design issues, including the utility's practice of switching small commercial customers to demand rates, relaxing the demand threshold at which commercial customers are subject to demand rates, the utility's proposal for modifying time-varying pricing windows, and the establishment of a pilot time-of-use rate for Secondary General (SG) commercial customers intended to remedy the misalignment between the SG non-coincident demand rate design and cost causation and set a foundation for a default time-varying rate option for SG class customers.

Kentucky Public Service Commission. Docket Nos. 2020-00349 and 2020-00350. March 2021 (Phase 1) and July/August 2021 (Phase 2). On behalf of the Kentucky Solar Energy Industries Association.



Kentucky Utilities and Louisville Gas and Electric general rate case applications. Provided an analysis of the utilities' current tariffs governing purchases from qualifying facilities and recommended changes to align them with state regulations, recent precedent, and accepted methodologies of energy and capacity pricing.

South Carolina Public Service Commission. Docket Nos. 2020-264-E and 2020-265-E. February 2021. On behalf of the Solar Energy Industries Association and the North Carolina Sustainable Energy Association. Docket for establishing a Solar Choice tariff for customers of Duke Energy Carolinas and Duke Energy Progress. Provided testimony in support of a stipulated settlement discussing the critical role that a proposed smart thermostat rebate and enabling technologies more generally play in the successfully meeting the legislative objectives for Solar Choice tariffs.

South Carolina Public Service Commission. Docket No. 2020-229-E. January 2021. On behalf of the Solar Energy Industries Association and the North Carolina Sustainable Energy Association. Docket for establishing a Solar Choice tariff for customers of Dominion Energy South Carolina. Provided an analysis of the proposed Solar Choice tariff from the standpoint of NEM successor best practices, alignment with the enabling statute, and cost of service basis. Offered an alternative Solar Choice tariff proposal based on this analysis. Surrebuttal testimony provided an evaluation of solar customer cost of service correcting erroneous assumptions used by the Office of Regulatory Staff in its direct testimony.

Virginia State Corporation Commission. Docket No. PUR-2020-00134. January 2021. On behalf of the Behind the Meter Solar Alliance. Docket for Dominion Virginia's 2020 RPS Plan. Offered testimony supporting the designation of small-scale resource carve-out eligibility being limited to behind the meter resources, based on the underlying Virginia statute and other public policy reasons.

South Carolina Public Service Commission. Docket No. 2019-182-E. October 2020. On behalf of the Solar Energy Industries Association and the North Carolina Sustainable Energy Association. Docket for establishing a cost-benefit analysis methodology and protocols for net metering and DERs. Provided discussion of historic regulatory use of DG cost-benefit and cost of service studies, how results should be viewed, and a discussion of the role of economic benefits and resiliency in DER cost-benefit analyses.

Kentucky Public Service Commission. Docket No. 2020-00174. October 2020. On behalf of the Kentucky Solar Industries Association. Kentucky Power general rate case. Provided an evaluation and critique of the cost of service support for, and design of, Kentucky Power's proposed net metering successor tariff and offered recommendations for developing cost-based DER rate designs. Also recommended changes to the utility's QF tariff and calculation of capacity costs.

New Jersey Board of Public Utilities. Docket No. EO18101111. September 2020. On behalf of Sunrun, Inc. Public Service Gas and Electric energy storage deployment plan proposal. Offered alternative proposal for a program utilizing non-utility owned energy storage assets under an aggregator model with elements for benefits sharing and ratepayer risk reduction.

Virginia State Corporation Commission. Docket No. PUR-2020-00015. July 2020. On behalf of Appalachian Voices. Appalachian Power Company general rate case. Analysis of the cost basis for the residential customer charge, the Company's winter declining block rate proposal, and a proposed Coal Asset Retirement Rider (Rider CAR) providing for advance collection of anticipated accelerated depreciation of coal generation assets. Provided an alternative residential customer charge recommendation and an alternative rates proposal for addressing winter bill volatility for electric heating customers.

North Carolina Utilities Commission. Docket No. E-2 Sub 1219. April 2020. On behalf of the North Carolina Sustainable Energy Association. Duke Energy Progress general rate case. Provided analysis of



available rate options for electric vehicle charging and recommended the adoption of residential and non-residential EV-specific rate options and appropriate design characteristics for those rate options.

North Carolina Utilities Commission. Docket No. E-7 Sub 1214. January 2020. On behalf of the North Carolina Sustainable Energy Association. Duke Energy Carolinas general rate case. Provided analysis of available rate options for electric vehicle charging and recommended the adoption of residential and non-residential EV-specific rate options and appropriate design characteristics for those rate options.

Virginia State Corporation Commission. Docket No. PUR-2019-00060. November 2019. On behalf of Appalachian Voices. Old Dominion Power Company general rate case application. Analysis of the cost basis for the residential customer charge, proposal to change the residential customer charge from a monthly charge to a daily charge, and design of proposed customer green power program and utility owned commercial behind the meter solar proposal. Proposed modified optional rate structure for mid- to large-size non-residential customers with on-site solar and/or low load factors.

Georgia Public Service Commission. Docket No. 42516. October 2019. On behalf of Georgia Interfaith Power and Light, Southface Energy Institute, and Vote Solar. Georgia Power Company general rate case application. Analysis of the cost basis for the residential customer charge, the validity of the utility's minimum-intercept study, and a proposal to change the residential customer charge from a monthly charge to a daily charge.

Hawaii Public Utilities Commission. Docket No. 2018-0368. July 2019. On behalf of the Hawaii PV Coalition. Hawaii Electric Light Company (HELCO) general rate case application. Provided analysis of HELCO's proposed changes to its decoupling rider to make the decoupling charge non-bypassable and the alignment of the proposed modifications with state policy goals and the policy rationale for decoupling.

Virginia State Corporation Commission. Docket No. PUR-2019-00067. July 2019.* On behalf of the Southern Environmental Law Center. Appalachian Power Company residential electric vehicle (EV) rate proposal. Provided review and analysis of the proposal and developed comments discussing principles of time-of-use (TOU) rate design and proposing modifications to the Company's proposal to support greater equity among rural ratepayers and greater rate enrollment. ***This work involved comment preparation rather than testimony.**

New York Public Service Commission. Case No. 19-E-0065. May 2019. On behalf of The Alliance for Solar Choice. Consolidated Edison (ConEd) general rate case application. Provided review and analysis of the competitive impacts and alignment with state policy of ConEd's energy storage, distributed energy resource management system, and earnings adjustment mechanism (EAM) proposals. Proposed model for improving the utilization of customer-sited storage in existing demand response programs and an alternative EAM supportive of utilization of third party-owned battery storage.

South Carolina Public Service Commission. Docket No. 2018-318-E. March 2019. On behalf of Vote Solar. Duke Energy Progress general rate case application. Analysis of the cost basis for the residential customer charge and validity of the utility's minimum system study, AMI-enabled rate design plans, excess deferred income tax rider rate design, and grid modernization rider proposal, including the reasonableness of the program, class distribution of costs and benefits, and cost allocation.

South Carolina Public Service Commission. Docket No. 2018-319-E. February 2019. On behalf of Vote Solar. Duke Energy Carolinas general rate case application. Analysis of the cost basis for the residential customer charge and validity of the utility's minimum system study, AMI-enabled rate design plans, excess deferred income tax rider rate design, and grid modernization rider proposal, including the reasonableness of the program, class distribution of costs and benefits, and cost allocation.



New Orleans City Council. Docket No. UD-18-07. February 2019. On behalf of the Alliance for Affordable Energy. Entergy New Orleans general rate case application. Analysis of the cost basis for the residential customer charge, rate design for AMI, DSM and Grid Modernization Riders, and DSM program performance incentive proposal. Developed recommendations for the residential customer charge, rider rate design, and a revised DSM performance incentive mechanism.

New Hampshire Public Utilities Commission. Docket No. DE 17-189. May 2018. On behalf of Sunrun Inc. Review of Liberty Utilities application for approval of customer-sited battery storage program, analysis of time-of-use rate design, program cost-benefit analysis, cost-effectiveness of utility-owned vs. non-utility owned storage assets. Developed a proposal for an alternative program utilizing non-utility owned assets under an aggregator model with elements for benefits sharing and ratepayer risk reduction.

North Carolina Utilities Commission. Docket No. E-7 Sub 1146. January 2018. On behalf of the North Carolina Sustainable Energy Association. Duke Energy Carolinas general rate case application. Analysis of the cost basis for the residential customer charge and validity of the utility's minimum system study, allocation of coal ash remediation costs, and grid modernization rider proposal, including the reasonableness of the program, class distribution of costs and benefits, and cost allocation.

Ohio Public Utilities Commission. Docket No. 17-1263-EL-SSO. November 2017*. On behalf of the Ohio Environmental Council. ***Testimony prepared but not filed due to settlement in related case.** Duke Energy Ohio proposal to reduce compensation to net metering customers. Provided analysis of capacity value of solar net metering resources in the PJM market and distribution of that value to customers. Also analyzed the cost basis of the utility proposal for recovery of net metering credit costs, focused on PJM settlement protocols and how the value of DG customer exports is distributed among ratepayers, load-serving entities, and distribution utilities based on load settlement practices.

North Carolina Utilities Commission, Docket No. E-2 Sub 1142. October 2017. On behalf of the North Carolina Sustainable Energy Association. Duke Energy Progress general rate case application. Analysis of the cost basis for the residential customer charge and validity of the utility's minimum system study, allocation of coal ash remediation costs, and advanced metering infrastructure deployment plans and cost-benefit analysis.

Public Utility Commission of Texas, Control No. 46831. June 2017. On behalf of the Energy Freedom Coalition of America. El Paso Electric general rate case application, including separate DG customer class. Analysis of separate DG rate class and rate design proposal, cost basis, DG load research study, and analysis of DG costs and benefits, and alignment of demand ratchets with cost causation principles and state policy goals, focused on impacts on customer-sited storage.

Utah Public Service Commission, Docket No. 14-035-114. June 2017. On behalf of Utah Clean Energy. Rocky Mountain Power application for separate distributed generation (DG) rate class. Provided analysis of grandfathering of existing DG customers and best practices for review of DG customer rates and DG value. Developed proposal for addressing revisions to DG customer rates in the future.

Colorado Public Utilities Commission, Proceeding No. 16A-0055E. May 2016. On behalf of the Energy Freedom Coalition of America. Public Service Company of Colorado application for solar energy purchase program. Analysis of program design from the perspective of customer demand and needs, and potential competitive impacts. Proposed alternative program design.

Public Utility Commission of Texas, Control No. 44941. December 2015. On behalf of Sunrun, Inc. El Paso Electric general rate case application, including separate DG customer class. Analysis of separate



rate class and rate design proposal, cost basis, DG load research study, and analysis of DG costs and benefits.

Oklahoma Corporation Commission, Cause No. PUD 201500274. November 2015. On behalf of the Alliance for Solar Choice. Analysis of Oklahoma Gas & Electric proposal to place distributed generation customers on separate rates, rate impacts, cost basis of proposal, and alignment with rate design principles.

South Carolina Public Service Commission, Docket No. 2015-54-E. May 2015. On behalf of The Alliance for Solar Choice. South Carolina Electric & Gas application for distributed energy programs. Alignment of proposed programs with distributed energy best practices throughout the U.S., including incentive rate design and community solar program design.

South Carolina Public Service Commission, Docket No. 2015-53-E. April 2015. On behalf of The Alliance for Solar Choice. Duke Energy Carolinas application for distributed energy programs. Alignment of proposed programs with distributed energy best practices throughout the U.S., including incentive rate design and community solar program design.

South Carolina Public Service Commission, Docket No. 2015-55-E. April 2015. On behalf of The Alliance for Solar Choice. Duke Energy Progress application for distributed energy programs. Alignment of proposed programs with distributed energy best practices throughout the U.S., including incentive rate design and community solar program design.

South Carolina Public Service Commission, Docket No. 2014-246-E. December 2014. On behalf of The Alliance for Solar Choice. Generic investigation of distributed energy policy. Distributed energy best practices, including net metering and rate design for distributed energy customers.

AWARDS, HONORS & AFFILIATIONS

- Solar Power World Magazine, Editorial Advisory Board Member (October 2011 – March 2013)
- Michigan Tech Finalist for the Midwest Association of Graduate Schools Distinguished Masters Thesis Awards (2007)
- Sustainable Futures Institute Graduate Scholar Michigan Tech University (2005-2006)



CERTIFICATE OF SERVICE

I certify that the foregoing **Direct Testimony of Justin Barnes** on behalf of Georgia Interfaith Power & Light was filed in Docket No. 44280 with the Public Service Commission by electronic delivery on the 12th of June, 2025. An electronic copy of same was served upon all parties listed below by electronic mail as follows:



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