

June 30, 2025

VIA ELECTRONIC DELIVERY

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

Re: Post-Hearing Brief and Proposed Motion on Behalf of Georgia Interfaith Power & Light; Docket No. 44280

Dear Ms. Tanner:

Please find enclosed an electronic version of the following Post-Hearing Brief and Proposed Motion on behalf of Georgia Interfaith Power & Light to be filed in Docket No. 44280.

Respectfully submitted,



Bob Sherrier
Staff Attorney
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
678-686-8487
bsherrier@selc.org

Counsel for GIPL

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

June 30, 2025

POST-HEARING BRIEF AND PROPOSED MOTION

Georgia Interfaith Power & Light (GIPL) submits this brief urging the Commission to order greater protections for billpayers and more information disclosures. The economic growth at hand and its costs and benefits deserve a harder look than has been given in this proceeding. Intervenors like GIPL, whose members are residential and small commercial billpayers, have not been given the time or information necessary to assess the value of the proposed Stipulation to Extend the Alternate Rate Plan (Stipulation).

The questions posed by the Procedural & Scheduling Order in this proceeding include whether the Stipulation should be approved and whether it is “in the best interest of Georgia Power’s customers.” Georgia Power takes the position that information about whether smaller customers are subsidizing the biggest ones—as understood best through cost of service studies—is irrelevant to these proceedings. The system buildout anticipated by Georgia Power in the next few years is greater than any the state of Georgia has seen before, and so is the risk to billpayers. The best interest of customers must include consideration of fairness between customer classes.

GIPL hopes the promises of Georgia Power bear out but urges a “Trust, but Verify” approach for these critical next couple years. Accordingly, GIPL asks the Commission to adopt

by motion the policy statement agreed to by Georgia Power at the hearing: that residential and small business customers will not pay for any costs caused by new large loads. GIPL further asks that the Commission adopt by motion the recommendations of Witness Barnes and require ongoing disclosures of information necessary to ensure billpayer protections are realized.

I. The Commission should close the loopholes in the large load rules.

GIPL applauds the rules and regulations revisions that give additional contracting tools to Georgia Power but notes that the cost shift protections in those orders apply only to Georgia Power’s “discretion under the Rules and Regulations changes” and not to other reasonably foreseeable risks.¹ For example, it does not apply to already-contracted large loads. It does not apply to existing customers that propose to expand their operations. It does not apply to large generation costs incurred for projected customers who do not yet have a contract. Nor does it apply to preliminary determinations of cost causation: *which* costs are attributed to large loads.

Georgia Power Witness Abramovitz’s testimony appears to close this loophole that has concerned GIPL tremendously this year.

Q: Georgia Power has committed to ensuring that residential and small business customers will not pay for *any* costs caused by new large loads?

A: Yes. . . .²

The Commission can close the subsidy loophole by enshrining Georgia Power’s commitment as the official policy of this Commission as shown in GIPL’s Proposed Motion, attached.

¹ Order on Georgia Power Company’s Revision to Rules and Regulations Tariff Compliance Filing, Docket 44280 (April 17, 2025).

² Recording of Hearing on Stipulation to Extend the ARP at 7:04:47, Docket 44280 (June 26, 2025), available at <https://www.youtube.com/watch?v=SkHNY4mjSuY> (“Hearing”).

II. More information is needed to determine the impacts of large loads.

A. There is no evidence that residential customers are receiving \$2.89 of reduced costs in 2026, 2027, and 2028.

Over the last three years, the typical residential customer has seen their Georgia Power bills rise on average \$43 per month. And according to an internal Southern Company presentation filed in the 2025 IRP: “Bill Affordability Remains a Challenge for [Low-and-Moderate Income] Customers.”³ The Stipulation proposed here plans another rate increase for storm recovery next year and plans for Georgia Power’s expenses relating to unpaid bills to more than double.⁴

Whether this outcome is “in the best interest” of residential customers depends on what is likely to occur in the absence of the Stipulation. Staff testified it believes the Commission would raise residential bills again despite the fact that just last year the Commission ordered Georgia Power to “ensure the incremental revenue from new large load customers has downward pressure of at least \$2.89 per month to the typical residential customer using an average of 1,000 kWh per month for the years 2026, 2027, and 2028.”⁵

Georgia Power has failed to produce verifiable evidence of compliance with the Commission’s \$2.89 order. In fact, Georgia Power did not even mention this requirement until its rebuttal testimony, filed just six days before the hearing in this matter. Georgia Power simply promises that “it’s included in the numbers in our preliminary revenue requirement projections, the deficiency projections that we provided.”⁶

³ Georgia Power Response to Staff Data Request BAI-1-6, Attachment A at Slide 11, Docket 56002.

⁴ See Stipulation to Extend the ARP ¶ 10 (uncollectible expenses) and ¶ 3 (storm cost “rate increase”). Staff and Georgia Power point to a potential reduction in bills if the fuel cost rider can be adjusted next year after billpayers finish paying off the fuel cost spikes of 2022. Because that would or wouldn’t happen regardless of this Stipulation, the effect of the Stipulation itself amounts to a rate increase.

⁵ Order Adopting Stipulated Agreement, Attachment A: Stipulation ¶ 2, Docket 55378 (April 26, 2024).

⁶ Hearing at 7:01:21; see Georgia Power Response to Staff Data Request PIA-30-1.

Georgia Power conceded that they “don’t have the calculation” of any residential benefit.⁷ Nor did Georgia Power quantify a residential benefit for Staff.⁸ Instead, this stipulation relies on high-level, aggregated financial projections that are “just preliminary numbers to inform the Staff of where we could be headed,”⁹ and which Staff agreed were “not to the detail that we see in the [Annual Surveillance Reports].”¹⁰

Where did the \$2.89 residential benefit go? According to Georgia Power, “cost pressures ... more than offset the benefit of large load customers.”¹¹ But when pressed for verifiable information about those cost pressures, Georgia Power said that was not available for review, testifying, for example, that in the record here “there is no dollar amount for interest costs, there is no dollar amount for increased depreciation expense, or inflation.”¹² Staff did not see that information either.¹³

⁷ Hearing at 7:00:44.

⁸ Hearing at 7:01:57. Georgia Power seems to imply that the \$2.89 for residential customers might be nearly double now but doesn’t quite say that. Instead, Georgia Power carefully reframes things by referring to the “*overall* revenue requirement benefit,” Hearing at 7:00:44 (emphasis added), asserting that benefit “was almost twice as large as what was committed to as a part of the 2023 IRP Update Stipulation.” Rebuttal Testimony of Abramovitz and Berrigan at 8:15-18, Docket 44280 (June 20, 2025). But as Staff Witness Smith testified in the 2025 IRP, the concern is that “even if there was downward pressure in total ... the revenue from the new large load customers would end up in a particular rate category ... but the costs that have been incrementally incurred would be spent among all the customer classes, including the residential and small commercial class.” 2025 IRP Staff and Intervenor Hearing, T.2667:1-9, Docket 56002 (May 28, 2025).

It is not clear exactly how Georgia Power is calculating the overall benefit, but it may be referencing the “levelized net benefit to customers of approximately \$168 million” touted in the 2023 IRP Update. Direct Testimony of Aaron P. Abramovitz, Docket 55378, at 7:14-15 (March 18, 2024). Notably, when Georgia Power presented this benefit to residential customers in the 2023 IRP Update, it conceded that its evidence was “not a reflection of how rates will actually be made” and “is not an answer to which rates are calculated based upon.” See 2023 IRP Update Rebuttal Hearing, T.1984:17-19 and T.2137:9-12, Docket 55378 (March 27, 2024).

⁹ Hearing at 3:26:47.

¹⁰ Hearing at 4:05:27.

¹¹ Rebuttal Testimony of Abramovitz and Berrigan at 8:21-24.

¹² Hearing at 3:55:33.

¹³ E.g. Hearing at 3:49:51.

Nevertheless, Staff is convinced it is “very likely, if you have a rate case now, rates for the next three years will be higher.”¹⁴ But critically for the Commission’s decision here, even if Georgia Power’s “preliminary pro forma” revenue deficiency is accurate *and* the Commission would raise rates, that says nothing at all about *whose* rates the Commission would raise.¹⁵ When asked if the numbers provided to Staff by Georgia Power indicated *who* should pay for the preliminary revenue deficiency, Staff testified: “They did not. They did not.”¹⁶

B. The Commission should order Georgia Power to provide the information identified by GIPL Witness Barnes.

To help ensure compliance with the \$2.89 order and to ensure that data necessary for ratemaking in 2028 is both maintained and available for review over the next three years, GIPL asks the Commission to order Georgia Power to begin filing certain information well ahead of a 2028 rate case, specifically the load data, generation data, real-time energy pricing data, information regarding large load customers, and illustrative cost of service analyses as described in GIPL Witness Barnes’ testimony¹⁷ and identified in the attached Proposed Motion.

Stipulation paragraph 15 requires Georgia Power to file by July 1, 2028 “sufficient detail to show *how the Company proposes* to allocate the forecasted costs ..., as well as the forecasted revenues from the prospective new large load customers at issue..., to the various customer rate groups.”¹⁸ This requirement relates only to whatever Georgia Power elects to propose for large load cost and revenue allocation, which is not necessarily sufficient to support a complete

¹⁴ Hearing at 2:02:16.

¹⁵ Hearing at 5:02:32.

¹⁶ Hearing at 5:02:45. Two days after Staff and Georgia Power jointly filed the Stipulation, GIPL requested the information Staff relied upon to make its determination that the Stipulation is in the best interest of customers. Staff responded—the day *after* Intervenor testimony was due—that Staff could not provide any additional information. See Staff’s Response to GIPL’s Request for Supporting Documentation (June 13, 2025).

¹⁷ Testimony of Justin Barnes on behalf of GIPL, Docket 44280, at 2:14-4:18 (June 12, 2025) (“Barnes”).

¹⁸ Stipulation ¶ 15 (emphasis added).

analysis—from other stakeholder and billpayer perspectives—of the significant system impacts caused by these large loads.¹⁹ The importance of fulsome information ahead of 2028 is shown by Figure 1 below: The planned capital expenditures alone are staggering.

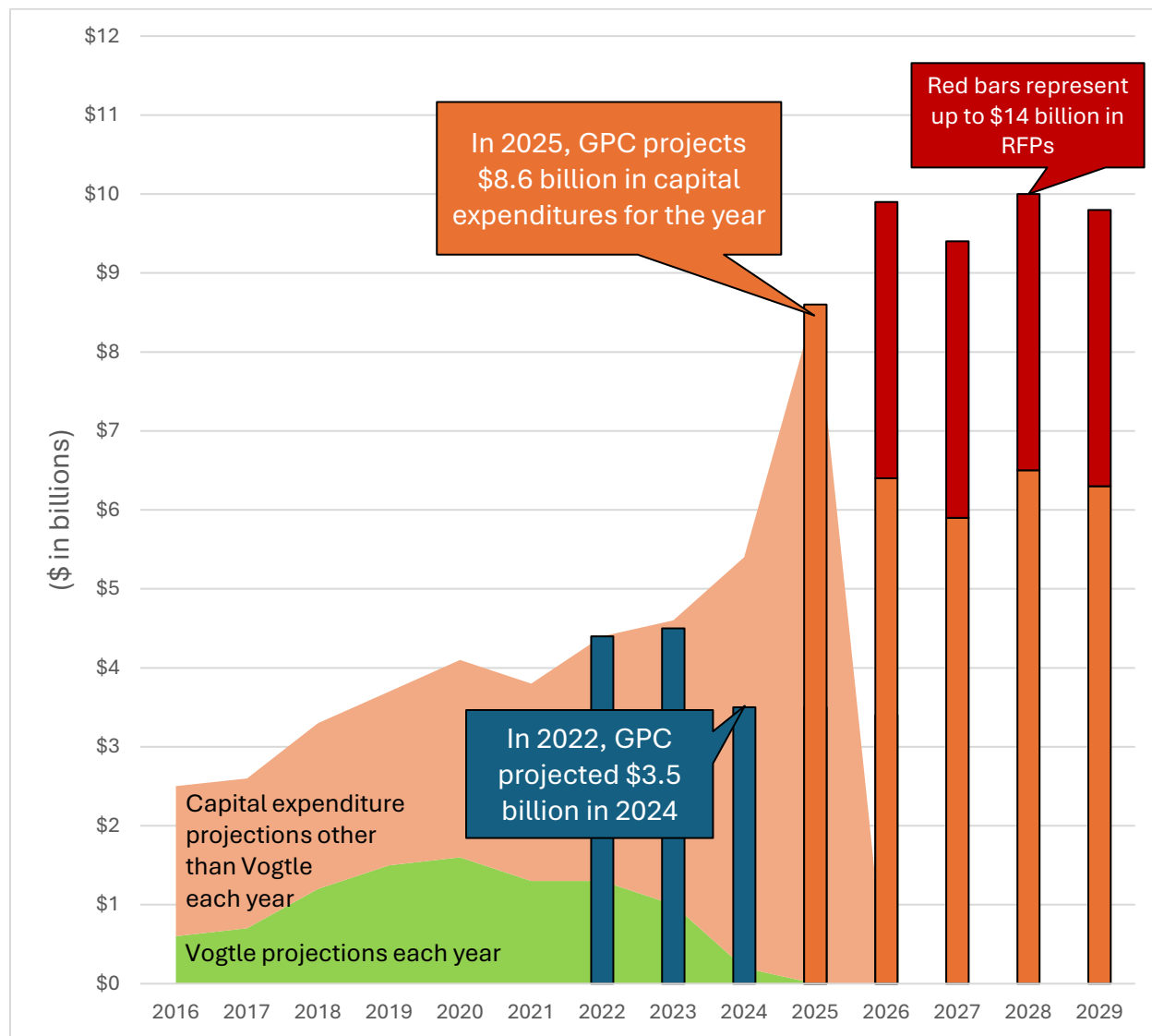


Figure 1: Explosive Growth in Billpayer Investment²⁰

¹⁹ See Barnes at 5:9-20; see also Direct Testimony of John Wilson at 6:28-8:9, Docket 44280 (June 12, 2025).

²⁰ The blue bars in Figure 1 are projected expenditures in the 2022 10-K filing. The orange and red bars are from the 2025 10-K filing. See GIPL Hearing Exhibit 3. The green area is the projected Vogtle Units 3 and 4 expenditures each year and the peach area is other expenditures projected (for example, the 10-K form filed in early 2018 projected expenditures of \$1.2 billion on Vogtle and \$2.1 billion on other projects in 2018). Southern Company 10-K Annual Reports (2016-2025); <https://investor.southerncompany.com/financials-and-sec-filings/sec-filings/>.

Staff has laudably committed to pursuing an ongoing understanding of the cross-subsidization concerns surrounding data centers, through hiring a cost of service expert and committing to ongoing data requests. But this process is too important to the future of all billpayers not to allow intervenors and the public to provide input and insight as well. Critically, Staff's mission is to balance the needs of all billpayers,²¹ not to represent the interest of the smallest billpayers most vulnerable in this time of change.

Respectfully submitted this 30th day of June, 2025.



Bob Sherrier
Jennifer Whitfield
Amitav Kamani
Southern Environmental Law Center
Ten 10th Street, NW, Suite 1050
Atlanta, Georgia 30309
404-521-9900
bsherrier@selc.org
jwhitfield@selc.org
akamani@selc.org

²¹ Hearing at 3:12:03 (“We [PIA Staff] represent all ratepayers, from industrials to residential.”).

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

Attachment 1: Proposed Motion

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

June 30, 2025

GIPL's PROPOSED MOTION

Georgia Interfaith Power & Light (GIPL) respectfully proposes a Commissioner Motion. GIPL requests the Commission amend the Stipulation by inserting two new paragraphs as follows:

1. Georgia Power shall ensure that residential and small business customers will not pay for any costs caused by new large loads.

2. Georgia Power shall report the following information identified by GIPL Witness Barnes as essential to an adequate review of cost allocation for the costs relating to new and expanding large load customers:
 - a. Forecasted and actual hourly (8,760) load data for all rate classes and individual rate schedules starting in 2024 using a 3-year forecast and 1-year actual format. For example, the 2024 dataset would include a 3-year forecast from 2025-2027 and actual 2024 data, while the 2025 dataset would reflect a 2026-2028 forecast and actual 2025 data.

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

- v. 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.
 - vi. 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.
 - vii. The covered customer’s projected and actual non-coincident peak load for each month starting August 1, 2023.
 - viii. The covered customer’s projected and actual coincident peak load for each month starting August 1, 2023.
 - ix. The covered customer’s projected and actual energy usage during each month starting August 1, 2023.
 - x. 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.
- e. 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.

CERTIFICATE OF SERVICE

I certify that the foregoing **Post-Hearing Brief and Proposed Motion** on behalf of Georgia Interfaith Power & Light was filed in Docket No. 44280 with the Public Service Commission by electronic delivery on the 30th of June, 2025. An electronic copy of same was served upon all parties listed below by electronic mail as follows:



Bob Sherrier

Sallie Tanner
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
stanner@psc.ga.gov

Tom Bond
Robert Trokey
Justin Pawluk
Chris Collado
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
tbond@psc.ga.gov
rtrokey@psc.ga.gov
jpawluk@psc.ga.gov
ccollado@psc.ga.gov

Jeremiah Haswell
Kyle Leach
Georgia Power Company
241 Ralph McGill Boulevard, NE
Atlanta, Georgia 30308
jhaswell@southernco.com
kcleach@southernco.com

Steven Hewitson
Brandon Marzo
Allison Pryor
Troutman Pepper Hamilton Sanders LLP
Bank of America Plaza
600 Peachtree Street, NE, Suite 3000
Atlanta, Georgia 30308
steven.hewitson@troutman.com
brandon.marzo@troutman.com
allison.pryor@troutman.com
on behalf of Georgia Power Company

Newton M. Galloway
Terri M. Lyndall
Galloway & Lyndall, LLP
406 North Hill Street
Griffin, Georgia 30223
ngalloway@gallyn-law.com
tlyndall@gallyn-law.com
on behalf of Americans for Affordable Clean Energy

Scott F. Dunbar
Keyes & Fox LLP
1580 Lincoln Street, Suite 1105
Denver, Colorado 80203
sdunbar@keyesfox.com
on behalf of ChargePoint, Inc.

Lucas Fykes
Keyes & Fox LLP
1580 Lincoln Street, Suite 1105
Denver, Colorado 80203
lfykes@keyesfox.com
on behalf of ChargePoint, Inc.

Alicia Zaloga
Keyes & Fox LLP
1155 Kildaire Farm Road, Suite 202-203
Cary, North Carolina 27511
azaloga@keyesfox.com
on behalf of ChargePoint, Inc.

Matthew Deal
ChargePoint Inc.
254 E. Hacienda Avenue
Campbell, California 95125
Matthew.Deal@chargepoint.com

Jared Ballew
ChargePoint, Inc.
254 E. Hacienda Avenue
Campbell, California 95125
Jared.ballew@chargepoint.com

Alan R. Jenkins
Jenkins at Law, LLC
2950 Yellowtail Avenue
Marathon, Florida 33050
aj@jenkinsatlaw.com
on behalf of The Commercial Group

Ben J. Stockton, PE, MBA
Concerned Ratepayers of Georgia
2230 Allen Road
Macon, Georgia 31216
encomanager13@gmail.com

Steven C. Prenovitz, MBA
Concerned Ratepayers of Georgia
4295 Amberglade Court
Norcross, Georgia 30092
scprenovitz@gmail.com

Angie Fiese
Cypress Creek Renewables, LLC
5310 S. Alston Avenue, Bldg. 200
Durham, North Carolina 27713
angie.fiese@ccrenew.com

Matt Kozey
Cypress Creek Renewables, LLC
1000 Wisconsin Avenue, Suite 100
Washington, D.C. 20007
Matt.kozey@ccrenew.com

Nikhil Vijaykar
Jason Keyes
Alicia Zaloga
Keyes & Fox LLP
580 California Street, 12th Floor
San Francisco, California 94104
nvijaykar@keyesfox.com
jkeyes@keyesfox.com
azaloga@keyesfox.com
on behalf of EVgo Services, LLC

Charles B. Jones, III
Lloyd Avram
Georgia Association of Manufacturers
75 Fifth Street NW
Suite 3412
Atlanta, Georgia 30308
(404) 219-9017
cjones@gamfg.org
lavram@gamfg.org

Jeffrey C. Pollock
J. Pollock Incorporated
14323 South Outer 40 Road, Suite 206N
Town and Country, Missouri 63017-5734
(314) 878-5814
(314) 878-7339 (fax)
jcp@jpollockinc.com
*on behalf of Georgia Association of
Manufacturers*

H. Gordon Kenna
DeKalb County Government
Department of Public Works
180 Sams Street
Decatur, Georgia 30030
hgkenna@dekalbcountyga.gov
*jointly intervened as Georgia Coalition of
Local Governments*

Kathy Reed
DeKalb County Government
Department of Planning and Sustainability
178 Sams Street
Decatur, Georgia 30030
kdreed@dekalbcountyga.gov
*jointly intervened as Georgia Coalition of
Local Governments*

Benjamin L. Snowden
Cordon M. Smart
Gerald T. Chichester
Fox Rothschild LLP
434 Fayetteville Street, Suite 2800
Raleigh, NC 27601
BSnowden@FoxRothschild.com
919-719-1257
CSmart@FoxRothschild.com
336-217-1903
GChichester@FoxRothschild.com
404-962-1012

David Junger
David Nifong
Rebecca Bryant
City of Decatur
Department of Public Works
2635 Talley Street
Decatur, Georgia 30030
David.junger@decaturga.com
david.nifong@decaturga.com
Rebecca.bryant@decaturga.com
404-295-2764
*jointly intervened as Georgia Coalition of
Local Governments*

Mike Wharton
Athens-Clarke County Unified Government
Sustainability Office
110 Bray Street
Athens, Georgia 30601
Mike.Wharton@accgov.com
706-613-3838
*jointly intervened as Georgia Coalition of
Local Governments*

Mendie White
Gwinnett County, Offices of the County
Administrator
75 Langley Drive
Lawrenceville, Georgia 30046
mendie.white@gwinnettcountry.com

Chandra Farley
John R. Seydel
City of Atlanta, Office of Sustainability
and Resilience
55 Trinity Avenue SW
Atlanta, Georgia 30303
cfarley@atlantaga.gov
Jrseydel@atlantaga.gov
*jointly intervened as Georgia Coalition of
Local Governments*

Joey Crews
Athens-Clarke County, Sustainability
Office
110 Bray Street
Athens, GA 30601
joseph.crews@accgov.com

Deborah Opie
Brionte McCorkle
*Georgia Conservation Voters Education
Fund*
725 Ponce De Leon Avenue, Fl. 2
Atlanta, Georgia 30306
deborah@gcvoters.org
brionte@gcvoters.org

Donald Moreland
Georgia Solar Energy Association
1199 Euclid Avenue
Atlanta, Georgia 30307
don@solarcrowdsource.com
Scott Thomasson
Thomasson Law, LLC
1025 Bond Street
Macon, Georgia 31201
scott@thomassonlaw.net
*on behalf of Georgia Solar Energy
Industries Association, Solar Energy
Industries Association, and Vote Solar*

Liz Coyle
Georgia Watch
55 Marietta Street, NW, Suite 903
Atlanta, Georgia 30303
lcoyle@georgiawatch.org

J. Brett Newsom
Adam Wise
Interstate Gas Supply
3344 Peachtree Road, Suite 2150
Atlanta, Georgia 30326
brett.newsom@scanaenergy.com
adam.wise@scanaenergy.com

Brad Carver
Joel L. McKie
Hall Booth Smith
191 Peachtree Street NE, Suite 2900
Atlanta, Georgia 30303
bcarver@hallboothsmith.com
jmckie@hallboothsmith.com
on behalf of Interstate Gas Supply

Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com
on behalf of The Kroger Co.

Kevin Higgins
Justin Bieber
Energy Strategies, LLC
215 South State Street, Suite 200
Salt Lake City, Utah 84111
khiggins@energystrat.com
jbieber@energystrat.com
on behalf of The Kroger Co.

Dante Mugrace
PCMG and Associates
90 Moonlight Court
Toms River, New Jersey 08753
dmugrace@pcmgregcon.com

Kimberly ("Kasey") A. Sturm
Weissman PC
One Alliance Center, Fourth Floor
3500 Lenox Road
Atlanta, Georgia 30326
kaseys@weissman.law
on behalf of Metropolitan Atlanta Rapid Transit Authority

Peter J. Andrews
Metropolitan Atlanta Rapid Transit Authority
2424 Piedmont Road, NE
Atlanta, Georgia 30324
pandrews@itsmarta.com

Jonathan J. Hunt, Chief Legal Counsel
Metropolitan Atlanta Rapid Transit Authority
2424 Piedmont Road, NE
Atlanta, GA 30324
jhunt@itsmarta.com

Jim Clarkson
Resource Supply Management
135 Emerald Lake Road
Columbia, South Carolina 29209
jclarkson@rsmenergy.com

Nicole R. Barnett Slaughter
H. Mark Hamlet
Sarah E. Morin-Gage
Jason Allen
Hamlet Law
5215 Junction Park Circle, Suite 202
Wilmington, North Carolina 28412
nsllaughter@hamlet-law.com
mhamlet@hamlet-law.com
smorin-gage@hamlet-law.com
jallen@hamlet-law.com
on behalf of RTC Investments

Isabella Ariza, Esq.
Sierra Club
50 F Street NW, 8th Floor
Washington, D.C. 20001
isabella.ariza@sierraclub.org
jointly intervened as Sierra Club, Natural Resources Defense Council, and Southern Alliance for Clean Energy

Curt Thompson
Attorney at Law
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100
Duluth, GA 300096
(470) 375-6962 Office
curtthompson@bellsouth.net
*jointly intervened as Sierra Club, NRDC,
and SACE*

Heather Pohnan
Southern Alliance for Clean Energy
691 John Wesley Dobbs Ave NE, Suite C
Atlanta, Georgia 30312
heather@cleanenergy.org
*jointly intervened as Sierra Club, NRDC,
and SACE*

Maggie Shober
Eddy Moore
Southern Alliance for Clean Energy
PO Box 1842 Knoxville, TN 37901
maggie@cleanenergy.org
eddy@cleanenergy.org
865-235-1448
*jointly intervened as Sierra Club, NRDC,
and SACE*

Patrick King II
Luis Martinez
Amanda Levin
Maeve Sneddon
Natural Resources Defense Council
1152 15th St NW #300
Washington, DC 20005
pkingii@nrdc.org, 225-241-2140
lmartinez@nrdc.org, 212-727-4550
alevin@nrdc.org, 202-289-2370
msneddon@nrdc.org, 202-836-9322
*jointly intervened as Sierra Club, NRDC,
and SACE*

Ernest Rogers
Thomas Farmer
Southface Energy Institute
241 Pine Street, NE
Atlanta, Georgia 30308
erogers@southface.org
tfarmer@southface.org

L. Craig Dowdy
Steven L. Jones
Taylor English Duma LLP
1600 Parkwood Circle, Suite 200
Atlanta, Georgia 30339
cdowdy@taylorenghish.com
sjones@taylorenghish.com
*on behalf of previously jointly intervened
Southern Alliance for Clean Energy and
Southface Energy Institute*

Lucy Bullock-Sieger
Lightstar Renewables, LLC
501 Boylston Street
Boston, Massachusetts 02116
lucy.bullock-sieger@lightstar.com

Dargan Scott Cole
Hall Booth Smith, P.C.
2710 Old Milton Parkway, Suite 200
Alpharetta, Georgia 30009
scole@hallboothsmith.com
on behalf of Lightstar Renewables, LLC

Simon Mahan
Southern Renewable Energy Association
11610 Pleasant Ridge Road, Suite 103 #176
Little Rock, Arkansas 72223
simon@southernwind.org

Emily W. Medlyn
U.S. Army Legal Services Agency
ELD Division
9275 Gunston Road
Fort Belvoir, Virginia 22060
emily.w.medlyn.civ@army.mil
*on behalf of the United States Department of
Defense and all other Federal Executive
Agencies*

Stephanie U. Eaton
Carrie H. Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC
Phone: (336) 631-1062
Fax: (336) 725-4476
seaton@spilmanlaw.com
cgrundmann@spilmanlaw.com

Steven W. Lee
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
Phone: (717) 791-2012
Fax: (717) 795-2743
slee@spilmanlaw.com

Patty Durand
Georgians for Affordable Energy
P.O. Box 5288
Atlanta, GA 30307
678-467-0148
patty@georgiansforaffordableenergy.org

David C. Kyler
Center for a Sustainable Coast
221 Mallery Street
St Simons Island, GA 31522
(912) 689-4471
susdev@gate.net

Kimberly Scott
250 Georgia Ave SE
Atlanta, GA 30312
(678) 913-4664
kim@georgiawand.org

Juan Estrada
Juan Estrada Law
3675 Crestwood Parkway, Suite 400
Duluth, Georgia 30096
Juan@JuanEstradaLaw.com