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July 3, 2025

VIA ELECTRONIC DELIVERY

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

Re: Post-Hearing Brief on Behalf of Georgia Interfaith Power & Light and Southface Energy Institute; Docket Nos. 56002, 56003

Dear Ms. Tanner:

Please find enclosed an electronic version of the following Post-Hearing Brief and Public Disclosure Version of Exhibit A on behalf of Georgia Interfaith Power & Light and Southface Energy Institute to be filed in Docket Nos. 56002 and 56003.

Respectfully submitted,

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STATE OF GEORGIA

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

July 3, 2025

POST-HEARING BRIEF BY GEORGIA INTERFAITH POWER & LIGHT AND SOUTHFACE ENERGY INSTITUTE

Georgia Interfaith Power & Light (GIPL) and Southface Energy Institute (Southface) (collectively, Intervenors) respectfully submit their Post-Hearing Brief with Intervenors' comments and recommendations in response to the evidence before the Georgia Public Service Commission (Commission) in the following two dockets: Docket No. 56002, Georgia Power Company's 2025 Integrated Resource Plan and Docket No. 56003, Georgia Power Company's 2025 Application for the Certification, Decertification, and Amended Demand-Side Management Plan.

INTRODUCTION

On January 31, 2025, Georgia Power Company (Georgia Power) filed an integrated resource plan (IRP) and applied for certification, decertification, and amendments to its demand-side management (DSM) plan. This application is extraordinary in its scope, as Georgia Power is asking the Commission for approval to purchase a massive amount of electricity over the next several years to serve a pipeline of customers, the vast majority of whom have no financial commitment to Georgia Power in return.

With the consistent encouragement of this Commission, Georgia Power has taken significant steps to ensure that future new large load contracts are designed to protect existing customers. However, Georgia Power's new rebuttal requests—to lock in its large load forecast here for the All-Source Proceeding down the road—put the Commission at a crossroads: Commissioners, you must decide whether to commit billpayer money to long-term generation assets *before* the prospective data center projects driving the demand have been required to make any significant financial commitment to Georgia Power. Alternatively, you can wait for further customer commitments to materialize or plan for only those customers who have committed to Georgia Power. GIPL and Southface urge you to reject Georgia Power's request to commit to buying a set number of MW based on insufficient data and a customer pipeline that has not yet been required to comply with this Commission's important billpayer protections.

In addition, GIPL and Southface urge you to forestall the most significant resource procurement decision at hand—when and whether to retire coal—in order to assess 1) the available resources from the all-source RFP and 2) the nature of the demand pipeline and projections after Georgia Power has implemented this Commission's new customer-protection contracting procedures.

As detailed below, during this period of significant load growth and changes in the Georgia Power customer and resource mix, intervenors and PIA Staff have identified several recommendations for more efficient and effective planning approaches so that Georgia Power can better serve the best interests of customers. A handful of these recommendations are further explained below.

While GIPL and Southface have largely focused on areas of improvement in the IRP, the IRP's demand-side management proposal embodies Georgia Power's customer-first motto and deserves celebration. Georgia Power has proposed a significant expansion of its demand-side management program, which offers a no-regrets solution to the growing system demand, while also investing in programs and tools that empower everyday Georgians to better control their own energy usage and bills. Intervenors fought for this demand-side management program as a way to help mitigate the increased bills resulting from construction of Vogtle Units 3 and 4. But at the time of the Vogtle settlement, Intervenors did not foresee that this demand-side management program would also help solve an increasing need for every MW of capacity. GIPL and Southface believe that Georgia Power can meet the Vogtle-target of demand-side management savings at a lower budget, and GIPL and Southface urge the Commission to approve the proposed demand-side management case.

SUMMARY OF RECOMMENDATIONS

The Commission has an obligation to ensure that Georgia Power is providing affordable and reliable electric service to its customers and an opportunity to mitigate customer bill increases. To further these goals, Intervenors have several recommendations to the Commission.

Large load modeling should be continuously updated based on the best available data, especially during this period of dynamic change. The Commission should:

1. **Reject Georgia Power's request to restrict the Commission's ability in the All-Source Proceeding to rely on the best available data to determine predicted need at the time of certification**. If Georgia Power requires certainty for planning its All-Source Proceeding certification request, the Commission should order Georgia Power to only plan for the need of its committed customers at this time.
2. **During the pendency of the All-Source Proceeding, order Georgia Power to provide regular updates on developments in the large load pipeline**—and the consequential impacts on its large load modeling, reporting on progress from the implementation of the Commission's customer protections from the new large load financial and collateral requirements.
3. **Order Georgia Power to incorporate the impacts of uncommitted large load customers cancelling projects and dropping out of the pipeline** when modeling its projected demand, as recommended by Ms. Hotaling.
4. **Extend Georgia Power's 2023 IRP requirement to publicly file quarterly large load reports,** requiring Georgia Power to incorporate information using the new categorizations of load as announced in Exhibit 1 of Georgia Power's rebuttal testimony.
5. **Defer major resource decisions, like coal retirement decisions, until the Commission can identify the most economic resource mix for customers** based on an updated load forecast and the 8,500 MW of available resource alternatives that may be revealed in the All-Source Proceeding.

The Commission should adopt Georgia Power's Demand-Side Management Proposed Case and should reduce its budget by motion.

6. **The Commission should adopt the target energy savings in Georgia Power's Demand-Side Management Proposed Case** to provide both valuable capacity during this time of growth and meaningful bill relief for participants. The Commission can reasonably expect Georgia Power to achieve these energy savings even with a reduced budget of 1% of retail revenues, as described in Ms. Sherwood's testimony.

Additionally, the Commission should enact a number of planning recommendations that are forward-looking.

7. The Commission should formalize Georgia Power's commitment to adopting more efficient transmission planning methods by—in advance of the 2028 IRP—requiring:
    a. A 20-year planning horizon, a transmission advisory committee, and running multiple scenarios to identify the best possible outcome; and
    b. A study of a wider-range of alternative solutions to affordably meet demand, such as maximizing the capacity of transmission lines through high-voltage lines, as well as studying regional and interregional alternatives to local lines.
8. The Commission should require Georgia Power to explore the true economic value of solar by removing the artificial build limit in its modeling for at least one modeling scenario in its next IRP. Exploring the full potential of solar generation can provide the Commission with critical data about the most cost-effective resource options when finalizing Georgia Power's resource mix over the coming years.
9. The Commission should ensure Georgia Power revisits its target reserve margin modeling approach in its next reserve margin study by modeling data centers as a distinct class.

DISCUSSION

I. Before making significant resource procurement decisions, the Commission should require Georgia Power to rerun the load growth forecast with the best available data given the unprecedented growth uncertainty and the speed of data center growth.

The pipeline used by Georgia Power includes nearly 100 commercial customers who announced an average demand of 500 MW, nearly all of which are projected by 2031, the year targeted in the All-Source RFP.[1] The pipeline numbers remain eye-popping, but as of the rebuttal hearings, **Georgia Power's actual system only has a single data center customer demanding more than 150 MW**.[2] Since the 2023 IRP Update, Georgia Power has consistently revised its forecasts downward for near-term years.[3] This year, Georgia Power expects to have only **half** the new large load demand that it predicted for this year in the 2023 Surprise IRP. If this trend continues, the Commission could direct the purchase of several thousands of MW that are neither needed nor paid for in this fall's All-Source Proceeding.

The pace of **committed** growth is slowing. Dramatically. Since filing this petition, Georgia Power has not signed a single new contract, and the number of total customers with requests for service has **decreased**.[4] This starkly contrasts with the 2023 Rebuttal hearings, where Georgia Power testified that during the pendency of that docket, Georgia Power had been selected to serve

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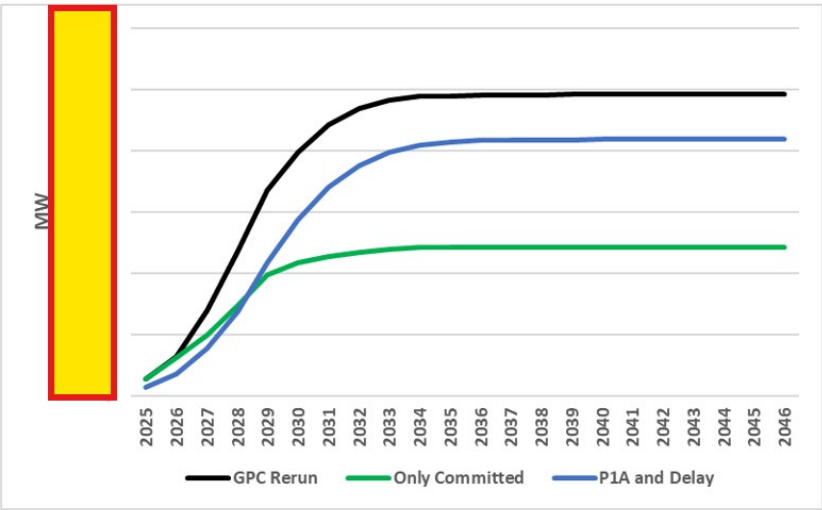
[1] Approximations based on Q1 2025 Large Load Report, Dkt. 55378.

[2] *See* 2025 IRP Rebuttal Hr'g Recording at 5:04:59 (Georgia Power witness Valle states, "[F]or example, the largest data center that we have, which is over 100 MW has been in service for, again subject to check, I would say, at least five years[.]); *see also* 2025 IRP Rebuttal Hr'g Recording 5:47:40 (The panel agrees that the largest data center load on the system right now is 150 MW, clarifying that it is the largest metered data center load.).

[3] *Compare* 2023 IRP Update Main Doc. at 10 (Figure 3 illustrates the projected winter peak demand) *with* 2025 Rebuttal Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle at 21:1-2 (the values provided in Figure 2 indicate a decline in the forecasted near-term peak demands from the 2023 IRP to the 2025 IRP, as well as another decline from the 2025 IRP to the February 2025 rerun.).

[4] *See* 2025 IRP Rebuttal Hr'g Recording at 6:33:42 (Ms. Whitfield asks Georgia Power witnesses Grubb and Valle, "Since the new large load rules were first approved in January, Georgia Power hasn't signed a single contract for a new large load customer, has it?" Witness Grubb replies, "That's correct." Witness Valle also replies, "Yeah, not yet."); *see also* large load reports filed in Dkt. 55378 (since Q2 of last year, Georgia Power signed just *three* new contracts).

2,600 MW more from committed customers, which Georgia Power claimed "clearly indicates that these customers are coming, that significant load will materialize, and that the need to serve [] that load will occur sooner, rather than later."[5] If committed customers are the best proxy for actual demand, Georgia Power's predictions vastly overstate its need, as reflected in the updated chart from Witness Hotaling below, using Georgia Power's February model.[6]



GIPL and Southface recognize that growth is coming, and that Georgia needs new energy resources to meet the growing need. However, **committed customers** (either with a contract or merely a request to service) **require about half of the demand** identified by Georgia Power as a need in 2031. If all customers are used, including the speculators[7] whose only investment to-date may be the completion of a customer intake form or an option-to-buy land for development,[8] the Commission ought to consider the dropout rates seen in the data it has required Georgia Power to

[5] 2023 IRP Update, Rebuttal Hr'g Tr. 1954:4-10.
[6] Attached as Exhibit A.
[7] A single data center speculator in Georgia, with a GoDaddy website created in 2025, notes that it has 7.5 GW of data center demand in development. *See, e.g.*, Atlas Development, https://atlasdevelopment.org/ (last visited July 2, 2025); Floyd Cnty. Bd. of Comm'rs (May 27, 2025), https://floydcountyga.granicus.com/MinutesViewer.php?clip_id=111&doc_id=96a68cca-3feb-11f0-b7f5-005056a89546 (last visited July 2, 2025).
[8] *See* 2025 IRP Rebuttal Hr'g Recording at 5:53:34 (Georgia Power witness Robinson affirms that, currently, completing the customer intake form is a requirement to be a part of the large load customer pipeline).

track. Georgia Power rejects expert Hotaling's recommendation to use its own data to account for the high dropout rates of speculative customers, but if one accounts for expert Hotaling's data-driven recommendation, the projected load of the entire pipeline shrinks by approximately 2,000 MW more by 2031,[9] as reflected in the blue line (P1A and Delay) above.

Georgia Power's implementation of critical billpayer protections approved by this Commission in January and April are expected to significantly reduce the pipeline, because Georgia Power will be allowed to require large load customers to pay for the timeline and transmission studies required to assess an appropriate price and interconnect their load. Surprisingly, given the scale of the request in this IRP, Georgia Power remains early in the implementation process. At the Rebuttal hearing, Georgia Power could not even verify whether these new processes have already been applied to 100% of its committed customers, no less the dozens of project developers with projects in the pipeline without any financial commitment to Georgia Power.[10] This large load customer protection process could result in a significant reshaping of Georgia Power's pipeline—and consequently, Georgia Power's projected need for energy.

A. The Commission should reevaluate the large load forecast during the All-Source Proceeding based on the best information at the time.

Commissioners should not bind themselves in the future to a load forecast from February: the large load pipeline is undergoing a much-needed transformation as this Commission's January/April large load rules are implemented by Georgia Power. As Georgia Power holds its pipeline projects accountable for the study costs necessary to stay in the pipeline, Georgia Power

[9] *See* 2025 IRP Rebuttal Hr'g Recording at 6:37:13 (Ms. Whitfield asks the panel "Would it surprise you to learn that . . . if you account for dropout and delay, the database recommendations from GIPL and Southface expert Ms. Hotaling, it would reduce the load adjustment used by Georgia Power in its February model by about 2,000 MW by 2031?" Georgia Power witness Mr. Valle, although unaware of the analysis, states that "it doesn't surprise [him].").
[10] *See, e.g.*, 2025 IRP Rebuttal Hr'g Recording, beginning at 5:57:56.

and customers will get much-needed information about the seriousness of those projects and whether it is reasonable to commit billpayer money to support them.

GIPL and Southface urge Commissioners to order Georgia Power to periodically update the Commission on developments in the large load pipeline as the new financial requirements and collateral requirements are implemented. These updates—in conjunction with public engagement—should inform the Commission's determination of need for the upcoming All-Source Proceeding.

Billpayers need Georgia Power to be as accurate as possible in its forecast before it invests multiple Vogtles' worth in billpayer-funded capital costs—over the next three years—to accommodate its predicted growth.[11] Additional time and data will support increased accuracy and the best possible outcome for customers.

B. The Commission should require Georgia Power to reduce the load forecast's "project success" assumptions to account for project cancellations seen in its own data.

Georgia Power's projections of large load customers continue to overstate the need for energy demand because Georgia Power fails to account for the high rate of project cancellation. Instead, Georgia Power argues that project cancellation is irrelevant because the cancelled project is removed from the next iteration of the large load projections, and a new, yet-to-be-identified project is likely to take its place. Georgia Power's factual assertions are accurate (cancelled projects *are* removed from the next model iteration), but the underlying premise about the importance of cancellations to the accuracy of our predictions is flawed. As just one example:

[11] *See* 2025 IRP Hearing Tr. 1768:12-23 (Mr. Baker asks Staff Witness Newsome about the cost of Georgia Power's proposed load addition, stating that "[T]his is the biggest. Their rate base is doubling. It's just not the generation. It's all transmission. It's got to come in too. It's a huge capital investment" Witness Newsome further adds that "It's two to three Vogtles, maybe four, in terms of costs."); *see also* Southern Company 2025 10-K Annual Report at II-52, https://investor.southerncompany.com/financials-and-sec-filings/sec-filings/sec-filings-details/default.aspx?FilingId=18204381 (according to the 2025 report, there is ". . . up to $14 billion . . . for Georgia Power-owned proposals in RFPs and related transmission investments through 2029").

When a mature pipeline project is cancelled, the new project that might fill out an interest form and join the pipeline is not equally positioned to demand energy at the same pace or same quantity as the cancelled project, and critically, the model still fails to account for the reality that there is a high risk the new project will drop out.

Georgia Power has repeatedly, accurately testified that the large load materialization model is not designed to predict future, hypothetical loads—and at the same time argued that its model for "project success" should not account for the reality of project cancellations, based on hopes for future, hypothetical additions to the pipeline. Barring any reason to believe that the significant rate of project cancellations seen already in the pipeline is atypical or unusual—and Georgia Power has offered none—the Commission should not accept Georgia Power's inflation of its "project success" probabilities. Georgia Power says it will regularly update its model using real data: So, it should account for its own data demonstrating a high rate of project cancellations that are not accounted for in its model, as recommended by Ms. Hotaling through her "P1A" dropout. Georgia Power says its model is not based on hypothetical future loads: So, it should not inflate "project success" based on its expectation that dropout will be offset by hypothetical future loads. GIPL and Southface urge the Commission to require Georgia Power to consistently apply its own principles to its load materialization model, even if it may cause the model to predict less demand.

C. The Commission should require ongoing publications of quarterly reports with updated, newly tracked categorizations.

The Commission should require Georgia Power to continue filing quarterly large load reports and to update those reports with the newly relied upon customer categorizations in Georgia Power's Rebuttal large load materialization assumptions.[12] Quarterly reporting of large load

[12] *See* Rebuttal Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle, Exhibit 1 (Georgia Power identifies new segments within customer classes, located under "7.1.1 Known Project Inputs").

growth is a critical tool for this Commission and the public to monitor as customers explore Georgia Power as its energy provider. During a period of dynamic growth and grid change, this element of transparency helps build trust with the public as Georgia Power navigates significant growth.

D. The Commission should defer significant resource decisions, most notably, whether to delay coal retirement.

The Commission should decline to make significant resource decisions—like whether to retire coal—based on the information available to it at this time. By the end of this year, the Commission will have significantly more information about whether data center contracts begin to rapidly materialize or whether the growth in committed customers remains stagnant. The Commission will also know details about the resources available in the All-Source Proceeding, and it will be able to evaluate the most economic resource mix for customers at that time. As shown by Staff, the continued operation of coal plants is uneconomic if its replacement generation does not require new transmission.[13] But at this moment, the possible replacement for coal is a mere hypothetical; in a matter of months, Georgia Power will reveal potential new generation resources.

Coal commitments are the least economic for residential and small business customers, who subsidize larger customers based on Georgia Power's bill allocation methods.[14] Rather than

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[13] *See* Dir. Testimony of Tom Newsome, Philip Hayet, Anthony Sandonato, and Leah Wellborn at 78 ("The analysis shows that with transmission costs removed, Imminent Retirement would be the most economic option in both the MG0 Phase 1 (ELG) Study and MG0-111 GHG Rule Phase 2 analyses for Bowen[.]); *see also id.* at 80:5-7 ("Staff found that the Company's coal retirement analysis and proposed 111 GHG Rule compliance study results were significantly influenced by the impacts of transmission costs and term equalization adjustment costs."); *see also* 2025 IRP Tr. 1760:9-16 (Ms. Whitfield asks, "[W]ould you agree with me that . . . under the scenario with no transmission for replacement resources at Bowen, that it would be several billion dollars less to immediately retire Bowen under the MG0[-]111 scenario?" Staff witness Hayet replies, "Yes, that's a correct reading of the table, if you make the assumptions that there would be no transmission costs whatsoever.").

[14] *See, e.g.*, 2022 Dir. Testimony of Justin Barnes on behalf of GIPL, Dkt. 44280 at 16:11-14 ("The current framework that causes residential customers to bear a disproportionate share of CCR remediation costs is a clear cost shift in which residential customers are subsidizing customer classes who cause greater costs by consuming of greater amounts of energy."); *see also* 2022 Dir. Testimony of Jamie Barber, Benjamin Deitchman, and Glenn A. Watkins, Dkt. 44280 at 52:1-2 ("[T]he current ECCR cost recovery method is contrary to cost causation and inequitable across rate schedules.").

commit to continue coal for data centers in this moment of uncertainty, GIPL and Southface urge the Commission to couple the consideration of coal retirements with the other large resource decisions that will present themselves in the All-Source Proceeding later this year.

II. The Commission should approve Georgia Power's DSM Proposed Case – a no-regrets capacity solution – while modifying the budget to an even more cost-effective level of 1% of retail revenues.

Georgia Power's Proposed Case achieves meaningful levels of cost-effective energy savings by including a performance savings target of 0.75% of annual retail sales, consistent with the Vogtle Prudence Order.[15] If the Commission approves Georgia Power's Proposed Case, customers would benefit from an additional 741 GWh of annual energy reductions between 2026-2028, a laudable increase of more than 50% from the existing DSM portfolio.[16] Given the significant load forecast increase, both in the short- and long-term, achieving an additional 224 MW of annual peak demand savings between 2026-2028 will benefit all customers from both a reliability and cost perspective.[17] GIPL and Southface applaud Georgia Power for meeting this moment of growth with these meaningful increases in DSM programming.

Consistent with the Commission's DSM Program Planning Process,[18] the Proposed Case passes the Total Resource Cost (TRC) test. As explained by Staff, "the TRC test is the best test

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[15] 2025 IRP Main Doc. at 54; Order Adopting Stipulation at ¶ 15, Dkt. 29849, Georgia Power Company's Application to Adjust Rates to Include Reasonable and Prudent Plant Vogtle Units 3 and 4 Costs ("Georgia Power agrees to propose and support in the 2025 [IRP] … a base case of DSM performance savings targets of at least .75% of annual retail sales.")

[16] *See* 2025 Dir. Testimony of Dr. Ross Beppler, Carley Goff, A. Wilson Mallard, and Andy Phillips at 9:18-22.

[17] *See id.* at 9:20-22 ("[Georgia Power] is proposing a DSM plan that will result in an additional 741 GWh of energy reductions annually and 224 MW of peak demand savings for the years 2026-2028").

[18] "The purpose of using this approach for DSM program development is to ensure that the process is robust and transparent…." Dir. Testimony of Barber, Cooper, and Spellman at 11:19-12:2, Dkts. 56002-03 (May 5, 2025). In stark contrast is the "capacity and affordability" case that is the basis of Staff's proposed case and which was never revealed to the DSM working group. *Id.* at 35:1-2; Tr. 2019:2-11 (this case was never revealed to the DSM working group). GIPL and Southface adamantly oppose Staff's case as it not only springs from this never-before-seen fourth DSM case, but also because it negates the promise of meaningfully increased energy savings from the Vogtle settlement. *See* Staff Exhibits BCS-7 and BCS-9 (current energy savings target: 499 GWh and Staff's proposed target: 503 GWh).

because it allows DSM measures to compete head-to-head with supply-side measures."[19] That is, the Proposed Case has a positive value for customers.[20] And that benefit to customers, and the System, only increases if avoided costs continue to rise as expected.[21] Similarly, the Proposed Case passes the program administrator cost test, which focuses on system costs and benefits for Georgia Power, indicating the Proposed Case will lower overall system costs.[22]

While Intervenors recommend the Commission approve Georgia Power's proposed energy savings target of 0.75%, GIPL and Southface expert Sherwood noted that it is reasonable for these targets to be achieved at a lower cost. Georgia Power can reach its goals with reduced costs by modifying assumptions about required incentive payments and prioritizing demand response programs, among other reasons.[23] While DSM savings are undeniably valuable and yield system-wide benefits, even at the prices proposed by Georgia Power, GIPL and Southface submit that this progress can be made more efficiently.

Finally, setting a higher savings target with a lower budget is consistent with previous Commission Orders. For example, in 2019, the Commission ordered an increase to the energy savings target of 15%, while only increasing the budget by 10%.[24] Similarly in 2022, the Commission ordered a savings increase of 15%, and a budget increase of 11%.[25] Georgia Power has proven time and time again that it is capable of achieving ambitious goals when ordered to achieve them. Therefore, GIPL and Southface recommend the Commission reduce the Proposed

[19] 2025 IRP Tr. 2018:4-6.
[20] *See id.* at 363:18-364:13 (describing supply-side resources in IRP as "cheaper and more economic than building new generation").
[21] *See* Georgia Power Company's 2025 Avoided Cost and Solar Avoided Cost Projections, Dkt. 4822 (June 27, 2025).
[22] 2025 Dir. Testimony of Stacy L. Sherwood on behalf of GIPL and Southface at 4:15-24.
[23] *Id.* at 3:28-5.
[24] 2019 IRP Order Adopting Stipulation at pg. 19, Dkt. 42310 (July 29, 2019).
[25] 2022 IRP Order Adopting Stipulation at ¶ 75, Dkt. 44160 (July 29, 2022).

Case's budget to a more cost-effective level of 1% of retail revenues from the year prior, adjusted for inflation, while maintaining the Vogtle settlement's performance savings target of 0.75%.

III. Moving Forward Recommendations

The robust IRP hearing process identified multiple areas where Georgia Power—with the support of the Commission—could improve its planning and efficiency before future proceedings.

A. The Commission should require Georgia Power to adopt a more proactive, inclusive, scenario-tested transmission planning approach in time to be reflected in the 2028 IRP, in order to save billpayers money and enhance reliability.

Georgia Power continues to improve its transmission planning processes, but it must prioritize the most cost-effective and efficient transmission solutions to most economically and reliably meet the growing demand for energy. We are in a moment of great systemic change,[26] and the Commission should encourage Georgia Power to move faster to adapt its transmission planning processes to protect customers and to maintain reliability. The spike in costs associated with the IRP's Ten-Year Integrated Transmission System (ITS) Plan (Ten-Year Plan)[27] shows that business is no longer usual. We urge the Commission to require Georgia Power to 1) adopt a proactive, inclusive, and scenario-tested transmission planning process and 2) study a wide-range of alternative solutions to affordably meet demand, both in time to be reflected in the 2028 IRP transmission plan. **Billpayer savings will result from implementing these improvements.**

[26] *Cf.* 2025 IRP Tr. 539:3 (Georgia Power witness stating that "the ITS has functioned very well for 50 years.").
[27] *E.g., compare* 2025 IRP Appx. 3 at 575 (projecting that the transmission capacity expansion additions for 2025-2034 will cost around $13 billion) *with* 2023 IRP Appx. 3 at 299 (projecting that the transmission capacity expansion additions for 2022-2031 would cost around $0.5 billion). Notably, seven intervenor testimonies weighed in on transmission issues, underscoring the financial significance of this Ten-Year Plan.

1. The Commission should require Georgia Power to adopt a proactive, inclusive, and scenario-tested transmission planning process.

The Commission should require Georgia Power to extend its transmission planning horizon to twenty years. Anjali Patel, on behalf of GIPL and Southface, testified that Georgia Power's current ten-year planning horizon does not align with the lifespan of transmission lines or the time required to place transmission projects in service. Georgia Power recognizes that a longer planning horizon would "allow the necessary lead time to both identify and execute the most effective solutions,"[28] and should implement this change as soon as possible.[29]

The Commission should require Georgia Power to establish a transmission advisory group. Soliciting and considering stakeholder feedback throughout the transmission planning process will *lower* overall transmission costs.[30] Encouraging early stakeholder involvement will limit opposition, and ensure Georgia Power has the most accurate, relevant, and up-to-date information to support planning assumptions.[31] Despite these benefits, the ITS and Southern Company-wide planning processes exclude stakeholders entirely, while the regional Southeastern Regional Transmission Planning (SERTP) process offers very limited opportunities for stakeholders to influence the planning process.[32]

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[28] 2025 Dir. Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle on behalf of Georgia Power at 38:22-24.
[29] 2025 IRP Tr. 734:20-735:6.
[30] 2025 Dir. Testimony of Anjali Patel on behalf of GIPL and Southface at 41:14-47:7 (explaining the benefits of early stakeholder engagement for both customers and Georgia Power); *see also* Dir. Testimony of Alejandro Palomino on behalf of SREA at 23:1-7, 24:1-25:8.
[31] 2025 Dir. Testimony of Anjali Patel on behalf of GIPL and Southface at 45:6-21. For example, large energy consumers can provide Georgia Power with unique insight into their needs, preventing surprises that prompt costly changes. *Id.* at 45:8-16.
[32] *See, e.g.*, 2025 Dir. Testimony of Anjali Patel on behalf of GIPL and Southface at 42:1-44:13 (pointing out, among other things, that stakeholders may not attend ITS meetings and that the SERTP process does not engage stakeholders in the early planning stages and often reveals project proposals to stakeholders after those project plans are fully baked).

The Commission should require Georgia Power to develop at least three transmission planning scenarios.[33] Using multiple scenarios would enable Georgia Power to capture the impact of uncertainties in the planning process and select transmission facilities that are cost-effective under a wide range of outcomes.[34] Indeed, Commission regulations acknowledge the benefits of scenario planning by requiring the company to plan generation using three scenarios.[35] Currently, Georgia Power uses one scenario based on the generic expansion plan[36] to develop its Ten-Year Plan,[37] resulting in a less efficient portfolio of transmission solutions that drive up customer costs while delivering less value.

2. The Commission should require Georgia Power to study transmission alternatives by the 2028 IRP.

Because meeting significant load growth will require every tool in the toolbox, the Commission should require Georgia Power to study alternative transmission solutions to meet demand and to report on the results of those studies. For example, the Commission should require Georgia Power to consider maximizing the capacity of its transmission lines to take advantage of economies of scale. High-voltage lines will not always be the best option, but several intervenors urge Georgia Power to prioritize studying higher capacity lines as a first step.[38] The record in this IRP includes examples of higher capacity lines eliminating the need for previously planned,

[33] FERC's Order No. 1920 requires transmission planners to use three scenarios in their transmission planning processes, but because of the protracted timeline for compliance, affirmation from this Commission could provide more certainty and ensure that Georgia Power is harnessing best practices to the benefit of its consumers in time to be reflected in the 2028 IRP.
[34] 2025 Dir. Testimony of Douglas Smith and Sasikumar Kannan on behalf of Staff at 12:7-13. Several intervenors agree. *See, e.g.*, 2025 Dir. Testimony of Alejandro Palomino on behalf of SREA at 42:6-9; 2025 Dir. Testimony of Anjali Patel on behalf of GIPL and Southface at 26:12-14.
[35] Rule 515-3-4.03(4)(b); *see also* 2025 IRP Main Doc. at 18-20 (discussing scenario development).
[36] 2025 IRP Tr. 732:14-16, 733:1-7.
[37] *Id.* at 732:10-13.
[38] *See, e.g.*, 2025 Dir. Testimony of Anjali Patel on behalf of GIPL and Southface at 14:2-15:10.

smaller lines.[39] Although Georgia Power prioritizes study of high-voltage transmission lines for its strategic transmission planning process, it should be doing the same for all aspects of transmission planning.[40]

The Commission should likewise require Georgia Power to study regional and interregional alternatives to local lines.[41] Georgia Power states that it is involved "in robust collaborative transmission planning processes"[42] but does not make the results of those processes public nor has Georgia Power ever selected a regional or interregional transmission alternative through SERTP.[43] Increasing Georgia's connections to its neighbors could fortify the state's grid by expanding access to a bigger, more diverse portfolio of generation assets, which could prove particularly useful during extreme weather events. To benefit from these advantages, Georgia Power should bolster its study of regional and interregional transmission alternatives.[44]

* * *

Together, these modest changes will ensure that Georgia Power explores all possible efficiencies as it expands its transmission system to meet new demand, limiting the bill impacts to Georgia Power customers.

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[39] 2025 Dir. Testimony of Anjali Patel on behalf of GIPL and Southface at 15:1-10 (explaining that the Arlington Primary – HWY45/234 Reconductor 115kV line is no longer required because it was replaced by the Farley – Tazewell 500kV line, which solved system overloads that initially drove selection of the Arlington Primary line (citing Georgia Power Response to Data Request No. STF-GS-1-6)).

[40] 2025 Dir. Testimony of Anjali Patel on behalf of GIPL and Southface at 14:13-29.

[41] *See, e.g.*, *id.* at 53:11-54:29; 2025 Dir. Testimony of Alejandro Palomino on behalf of SREA at 41:6-8; 2025 Dir. Testimony of Derek Stenclik on behalf of NRDC, Sierra Club, and SACE at 87:81-12; 2025 Dir. Testimony of Ted Thomas on behalf of CEBA at 18:13-15.

[42] 2025 Dir. Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Franciso Valle on behalf of Georgia Power at 37:9-11.

[43] J. Michael Hagerty, et al., BRATTLE GROUP, *Modernizing Southeast Grid Investments: How Enhanced Regional Transmission Planning Supports a Growing Economy* 21, 23 (Mar. 2025).

[44] *See, e.g.*, Georgia Power response to STF-DEA-2-33 (indicating some level of coordination between ITS and Alabama Power but not providing transparent information on the derivation of assumptions such as where transmission constraints occur); 2025 Dir. Testimony of Ted Thomas on behalf of CEBA at 18:10-19:6; *see also* Telos Energy, *Winter Storm Elliott* at 8 (Apr. 2025) (noting that 15% of Georgia Power-owned resources "were on outage during Southern Company's highest risk period during" Winter Storm Elliott) *and* NERC, *Interregional Transfer Capability Study* at 100 (Nov. 2024) (noting, for example, that SERC-E would benefit from additional transfer capability "to provide access to more resources during periods of high stress").

B. The Commission should require Georgia Power to explore the true economic value of solar by removing the artificial build limit in its modeling in at least one modeling scenario.

In recent years, Georgia has been at the forefront of utility-scale solar generation around the country, yet Georgia Power holds itself back from harnessing the actual economically optimal level of solar generation for its future resource mix during a time of significant growth. On an annual basis, Southern Company caps the amount of solar that its model can identify as "economically optimal" to 1,500 MW across the entire Southern Company system, leading to Georgia Power's own associated artificial limit.[45] Georgia Power then uses that artificial cap as its basis for its recommended solar procurement targets.[46] This circular process artificially minimizes the economic value of solar to customers: Georgia Power chooses how much solar to buy based on its model outputs; but Georgia Power restricts its model from choosing more solar than a pre-determined cap based on its history of buying. In response to multiple intervenors' concerns about build limits in Georgia Power's modeling, Georgia Power witnesses assert that "it is important for the Company to assume practical limits, based on the Company's prior experience and knowledge, for all resources in its mix analysis."[47] However, Georgia Power still did not address that the "practical limits" are a product of artificially imposed build limits that prevent the resource mix model from analyzing the economically optimal levels of solar generation.

The Commission should require Georgia Power to remove the artificial build limit in at least one modeling scenario to ensure Georgia Power arrives at the most economically optimal

[45] 2025 Tech. Appx. 2, TS-Resource Mix Study, Table 4 at 21.
[46] *See* 2025 IRP Dir. Hr'g Tr. 503:3-8 (Witness Grubb on behalf of Georgia Power testifying: "I would disagree with the expansion plan not guiding the solar procurements. In the '22 IRP and this IRP, that guidance of the amount we would procure in utility scale RFPs was driven by the scenario of plans. It was an average across them. So that's what we did in '22, and that's what we did in '25.").
[47] 2025 Rebuttal Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle on behalf of Georgia Power at 34:21-23.

level of solar generation for its future resource mix. Doing so may lead Georgia Power to a different resource mix that benefits all customers through reduced costs.

C. The Commission should ensure Georgia Power revisits its target reserve margin (TRM) modeling approach in its next Reserve Margin Study by modeling data centers as a separate class.

Intervenors are appreciative of Georgia Power's commitment to ensuring electricity remains reliable in the event of a disruption of resources or unexpected load requirements. While reliability should remain a top priority for Southern Company and Georgia Power, an overstated TRM passes on significant costs to billpayers that outweigh incremental benefits. Staff recommends a lower TRM, not because it believes Georgia Power's system should be less reliable, but instead because it presents expert testimony that Georgia Power's recommended TRM overstates how much margin is necessary to be reliable.

Overall, Intervenors share Staff's concerns that the winter RM has been overstated, in part due to the behavior of the data center load in the Reserve Margin Study.[48] As Ms. Hotaling noted, the model used to perform the Southern Company Reserve Margin Study, SERVM, will apply an algorithm to scale up the projected load in response to certain weather conditions. But data center loads do not respond like typical loads, so this "scaling" effect will overestimate data centers' load demands and artificially inflate the needed TRM. Instead, Ms. Hotaling recommends new large load customers that are not as sensitive to weather should be modeled like a negative generator.[49] By modeling new large load customers in this manner, Georgia Power can avoid overestimating

[48] *See* 2025 Dir. Testimony of Tom Newsome, Philip Hayet, Anthony Sandonato, and Leah Wellborn at 17:14-15 ("Staff contends the System's winter TRM is overstated and should be lowered to 24.5%."); *id.* at 23:5-12 ("The Company's data center load assumptions contributed to an overstatement of the Company's winter TRM. The overstatement stemmed from the weather modeling approach the Company used to adjust the base year load forecast. The same weather adjustments were applied to the entirety of the load forecast even though large data center loads are much less weather sensitive and should have received a different (lower) adjustment to accurately reflect their impact on the system in the winter).

[49] 2025 Dir. Testimony of Chelsea Hotaling on behalf of GIPL and Southface at 32:11-14.

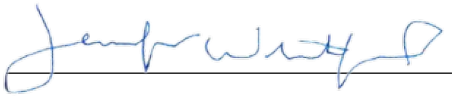
periods of risk attributed to such customers in SERVM, thereby preventing unintentional cost increases for billpayers.[50]

Intervenors appreciate Georgia Power's willingness to revisit its RM modeling in the next RM study by closely scrutinizing data center load behavior and evaluating recommendations Ms. Hotaling provided, such as modeling data centers as a separate class to account for their unique behavior on the grid.[51] Intervenors urge the Commission to adopt staff's TRM recommendations in its testimony today and ensure Georgia Power revisits its TRM modeling approach to avoid over forecasting the impact of large load customers that would otherwise drive costs up for ratepayers.

CONCLUSION

For the foregoing reasons, we urge the Commission to adopt Intervenors' recommendations outlined above.

Respectfully submitted this 3rd day of July, 2025.



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[50] *See id.* at 32:23-25.
[51] 2025 IRP Rebuttal Hr'g Recording at 7:01:29 (Georgia Power witness Looney states that, in addition to growing relationships with data centers, one way to explore temperature dependency is by "segregating that [data center] load and treating it separately" as suggested by Ms. Hotaling.).

STATE OF GEORGIA
BEFORE THE
PUBLIC SERVICE COMMISSION

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

EXHIBIT A

ENERGY FUTURES GROUP

In Rebuttal Testimony, Georgia Power presented updated results for its February 2025 sensitivity to the Large Load Realization Model ("LRM"). As part of the February 2025 LRM, Georgia Power made two modifications. The first modification impacted the load materialization probability assigned specifically to data center projects. In the February 2025 LRM, Georgia Power assigned different materialization rates based on the type of data center customer. This means that colocator data centers without committed tenants and data center develops are assigned a lower materialization level compared to hyperscalers and colocators with committed tenants.[1] The second modification that Georgia Power made was to shift to a stage-based likelihood of projects signing a Contract for Electric Service.

I reran Georgia Power's February 2025 LRM that was provided in hearing request response, HR 1-1.[2] I included two additional adjustments to Georgia Power's February 2025 LRM:

1. Only including committed customers[3], which are those customers with a signed Electric Service Agreement or Request for Service with Georgia Power.[4]

2. Including all customers (committed and those under technical review) with the modified project delay probabilities and the inclusion of the P1A probability to reflect the risk of technical customers dropping out of the load pipeline.

The project delay and P1A probability were determined based on the Q1 to Q4 data Georgia Power collected on its large load pipeline. For the P1A probability, 12 out of 41

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[1] Rebuttal Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle at 19.
[2] Exhibit 1 to the Rebuttal Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle noted that the sensitivity provided in response to HR-1-1 was a draft sensitivity.
[3] Georgia Power considers committed customers to be those customers who have at least executed a request for service from Georgia Power. 2025 IRP Main Document at 36, fn. 27.
[4] Data from the Q1 2025 Large Load Economic Development Report was used to assign the project stage for each customer.

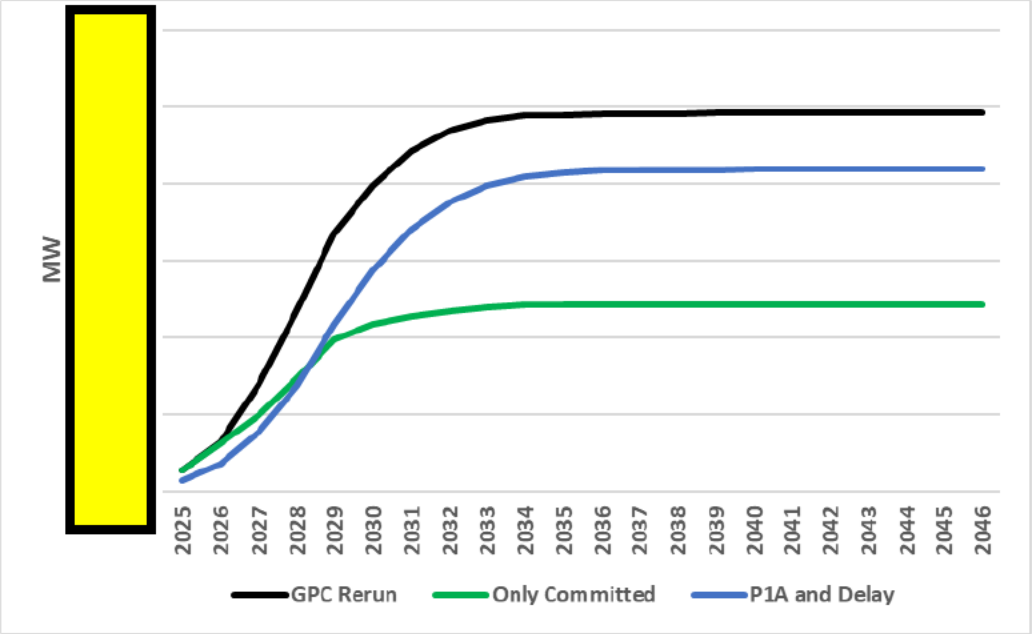
technical review projects dropped out of the queue, which translates to a probability of a technical review customer remaining in the queue at 71%.

Table 1 and **Figure 1** compare the results of my rerun of Georgia Power's February 2025 LRM and the two adjustments outlined above.

Table 1. Load Realization Model Results (MW)

Year	GPC Rerun	Only Committed	P1A and Delay
2025			
2026			
2027			
2028			
2029			
2030			
2031			
2032			
2033			
2034			
2035			
2036			
2037			
2038			
2039			
2040			
2041			
2042			
2043			
2044			
2045			
2046			

Figure 1. Large Load Model Comparison (MW)



CERTIFICATE OF SERVICE

I certify that the foregoing **Post-Hearing Brief and Public Disclosure version of Exhibit A** was filed with the Public Service Commission on behalf of Georgia Interfaith Power & Light and Southface Energy Institute in Docket Nos. 56002 and 56003 by electronic delivery on the 3rd of July, 2025. An electronic copy of same was served upon all parties listed below by electronic mail as follows:

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