

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA**

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

**POST-HEARING BRIEF AND PROPOSED ORDER OF
GA WAND AND VOTE SOLAR**

July 3, 2025

I. INTRODUCTION

GA WAND and Vote Solar submit this Post-Hearing Brief and Proposed Order to urge the Georgia Public Service Commission (“Commission”) to adopt policies in the 2025 Integrated Resource Plan (IRP) that directly address energy affordability, expand demand-side resources, and improve access to renewable energy. The Commission has a vital opportunity to prioritize affordability, distributed energy access, and resource diversity for Georgia’s future.

GA WAND and Vote Solar advocate for the implementation of measurable goals, transparent data reporting, and a planning framework that ensures Georgia Power’s decisions align with the public interest.

II. POLICY RECOMMENDATIONS

A. Prioritize Energy Affordability for Low-Income Customers

Dr. Yunus Kinkhabwala, testifying on behalf of GA WAND and Vote Solar, provided evidence that more than 620,000 Georgia Power residential customers are energy burdened, spending more than 6% of their income on home energy. The affordability gap—the amount needed annually to bring all customers to an affordable energy burden threshold—was estimated at \$540 million (Kinkhabwala Testimony, p. 9–11).

Despite this staggering affordability crisis within their service territory, Georgia Power’s IRP does not include any targeted plan or proposed programs to directly address and close this gap. Georgia Power also did not offer than analysis to show how its proposed resource decisions will affect affordability for its most vulnerable customers.

Commission Action Requested:

- Require Georgia Power to develop and provide an affordability impact analysis in future IRPs to analyze how its proposed resource decisions may impact affordability by including disaggregated bill impact modeling by income and geography. Such an analysis will better empower the Commission to make important resource decisions while also understanding the impact those decisions will ultimately have on ratepayers.

B. Treat Demand-Side Resources as Core System Assets

Dr. Kinkhabwala testified that while Georgia Power’s proposed IRP acknowledges the role of demand-side strategies—such as energy efficiency, weatherization, heat pumps, community solar, and customer-sited storage—these efforts remain significantly under-scaled relative to the need and opportunity. He explained that demand-side investments are not only

critical to improving affordability, particularly for low-income households, but are also essential to reducing overall system demand and enabling cost-effective integration of renewable resources (Kinkhabwala Testimony, p. 2–3, 6).

In un rebutted testimony, Dr. Kinkhabwala emphasized that these resources should be integrated into long-term planning, stating:

The further development of demand-side strategy is an exciting and welcome one for Georgia Power. Strategic demand-side resources can bring down bills and meet energy goals simultaneously. These include community solar, efficiency and weatherization, heat pump adoption, customer sited solar and storage, and more. However, the scale of these efforts are smaller than they need to be. Given the large growth in demand, these efforts should be more ambitious and integrated with supply-side planning as they will simultaneously make the adoption of renewables more sustainable and reduce the impact of bills on the most vulnerable households.

(Kinkhabwala Testimony, p. 2). GA WAND and Vote Solar therefore recommend that the Commission require Georgia Power to treat demand-side resources as more fundamental components of its long-term supply-side resource strategy and require Georgia Power to establish measurable performance and participation goals for demand-side programs, including targets for low- and moderate-income customers.

Commission Action Requested:

- Establish measurable performance and participation goals for demand-side programs, including specific targets for low- and moderate-income customers.

C. Improve the Solar + Storage Program Design

Multiple expert witnesses supported reforms to Georgia Power’s proposed solar + storage pilot. Russ Bates, testifying on behalf of the Capital Good Fund, recommended removing the 20kW cap on residential systems, noting that it unnecessarily limits customer value and grid

benefit, and is not aligned with current best practices in inverter control or interconnection management (Bates Testimony, p. 2–4). GA WAND and Vote Solar support Bates’ recommendations to remove this 20kW cap to better realize grid benefits and customer value.

Commission Action Requested:

- Revise the proposed solar + storage program to allow larger residential systems and remove the 20 kW cap.
- Require Georgia Power to report annually on how they are prioritizing participation in their solar + storage pilot program for income-qualified households and renters.

D. Improve Access to Residential Rooftop Solar.

Dr. Kinkhabwala’s testimony estimated that roughly 46 percent of customers that are energy cost burdened own their own homes and would benefit from fairly compensated residential solar if it were available. (Kinkhabwala Testimony, p. 17). However, the RNR net metering program from the 2019 rate case remains arbitrarily capped at 5,000 solar customer participants, out of Georgia Power’s approximate 2.7 million customers.

Commission Action Requested:

- Remove the cap on the allowed enrollment in the Company’s RNR net metering program, and revisit the success of the program in the Company’s 2028 IRP or rate case should it be deemed necessary.

E. Establish an Equitable and Scalable Community Solar Program

Dr. Kinkhabwala recommended a dedicated low-income community solar offering, citing national models that provide guaranteed bill discounts and expand access to renters and

households unable to install rooftop solar (Kinkhabwala Testimony, p. 20–21). Dr. Kinkhabwala also identified shortcomings associated with Georgia Power’s current community solar offerings, such as their program financed by corporate sponsors and limited to 5,000 income-qualified subscribers. This program has not enrolled any income-qualified subscribers, however, due to a lack of corporate sponsors. (Kinkhabwala Testimony, p. 18).

Commission Action Requested:

- Order Georgia Power to file a low-income community solar program offering a guaranteed bill discount in its 2028 IRP or rate case. Ensure the program is utility-funded, scalable, and subject to evaluation, measurement, and verification protocols.

F. Improve Transparency on Arrearages and Disconnections

Dr. Kinkhabwala emphasized the importance of collecting and reporting arrearage and disconnection data, and encouraged the Company to share more of this data, which can be used to identify how targeted demand-side resources at low-income households can be used to reduce shutoffs and arrearages (Kinkhabwala Testimony, p. 20).

Commission Action Requested:

- Require Georgia Power to file annual reports with the Commission on customer arrears and disconnections, disaggregated by ZIP code and income level, separate from any dockets in which Georgia Power may report that information.

PROPOSED ORDER

NOW COMES the Georgia Public Service Commission and, having considered the record in this proceeding, hereby FINDS and ORDERS:

1. To better empower the Commission in its assessment of resource decisions in IRPs while understanding the impact those decisions may ultimately have on ratepayers, Georgia Power shall develop and apply an affordability impact analysis in future IRPs to assess how its proposed resource decisions may impact affordability. As a part of this assessment, Georgia Power must include disaggregated bill impact modeling by income and geography.
2. Prior to its 2028 IRP filing, Georgia Power shall develop and file measurable adoption targets for low- and moderate-income participation in demand-side management programs, and shall implement these targets in its 2028 IRP.
3. Georgia Power shall revise its solar + storage pilot to enable systems larger than 20 kW to participate where feasible. Georgia Power shall annually report on participation from income-qualified households in its solar + storage pilot program and how the Company is prioritizing low- and moderate-income households' participation in this program.
4. The five thousand (5,000) customer cap on the allowed enrollment in the Company's RNR net metering program is removed, effective by this order. Should the Commission deem it necessary, further participation in the Company's RNR net metering program may be revisited in the Company's 2028 IRP or rate case filing.
5. Georgia Power shall propose a low-income community solar program offering with a guaranteed bill discount in its 2028 IRP or rate case filing. In developing this program

offering, Georgia Power must ensure that it is utility-funded, scalable, and subject to evaluation, measurement, and verification protocols.

6. Apart from any individual requirement in any currently open docket, Georgia Power shall annually file with the Commission and publish public data on customer arrears and disconnections, disaggregated by ZIP code and income bracket.

Respectfully submitted this 3rd day of July, 2025,

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