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July 3, 2025

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-9052

Re: In the Matter of:
Georgia Power Company's 2025 Integrated Resource Plan
(Docket No. 56002); and
Georgia Power Company's 2025 Application for Certification,
Decertification and Amended Demand Side Management Plan
(Docket No. 56003)
Post-Hearing Brief and Proposed Order

Dear Ms. Tanner:

On behalf of Georgia Coalition of Local Governments, we herewith provide the attached Post-Hearing Brief and Proposed Order for filing in the above referenced dockets.

A hard copy of this filing is also being provided by Federal Express in accordance with your instructions.

If you have any questions concerning this filing, please do not hesitate to contact me.

Sincerely,

/s/ Benjamin L. Snowden

Benjamin L. Snowden

A Pennsylvania Limited Liability Partnership

California Nevada Colorado New Jersey Delaware New York District of Columbia North Carolina Florida Oklahoma Georgia Pennsylvania Illinois South Carolina Massachusetts Texas Minnesota Washington Missouri



Ms. Sallie Tanner
July 3, 2025
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Copy to: All parties and counsel of record

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:)
)
Georgia Power Company’s 2025) **Docket No. 56002**
Integrated Resource Plan)

And

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

POST-HEARING BRIEF AND PROPOSED ORDER
BY GEORGIA COALITION OF LOCAL GOVERNMENTS

The Georgia Coalition of Local Governments (the “Coalition”) respectfully submits this Post-Hearing Brief with its comments and recommendations in response to the evidence before the Georgia Public Service Commission (the “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. The Coalition urges the Commission to adopt the Coalition’s proposed Ordering Paragraphs (attached as “Exhibit A”) in a final order in these dockets.

BACKGROUND

On January 31, 2025, Georgia Power Company (“Georgia Power” or “the Company”) filed an integrated resource plan (“IRP”) and applied for certification, decertification, and amendments to its demand-side management (“DSM”) plan. In pertinent part, the Company’s filings:

1. Propose modifications to existing Distributed Energy Resources (DER) programs and seek approval of a new large Customer Owned Resiliency program;
2. Propose a Customer-Sited Solar Plus Storage Pilot (“SPS Pilot”) Program for residential and commercial customers with a Customer-Directed program option and a Company-Directed program option that will target the addition of up to 50 MW of dispatchable storage resources;
3. Propose a new CARES Distributed Generation (“DG”) Subscription Program that will be available to eligible C&I customers with an aggregate demand between 1 MW and 3 MW and residential customers without a carve-out for Municipal, University, School, Hospital (“MUSH”) customers.
4. Propose to modify the price calculation methodology for the hourly credit under both CARES subscription programs to establish a reimbursement threshold or cap;
5. Propose modifications to the Customer Connected Solar Program (“CCSP”) to allow participating customers to add storage resources;
6. Propose a DSM portfolio (the “Proposed Case”) that would result in 224 megawatts (“MW”) of demand reduction and 741 gigawatt hours (“GWh”) of energy reduction each year, between 2023 and 2025, collectively amounting to 0.75% of the Company’s annual retail sales; and
7. Oppose the continuation of the Automated Benchmarking Tool (“ABT”) for the 2025-2028 program period.

The Commission heard direct testimony from the Company on March 25-27, 2025, direct testimony from the Public Interest Advocacy Staff (“PIA Staff”) and other intervenors on May 27-

29, 2025, and rebuttal testimony from the Company on June 23-24, 2025. This testimony and exhibits establish the record for these proceedings.

RECOMMENDATIONS

The Coalition respectfully requests that the Commission incorporate the Proposed Order in Exhibit A into its final order in this case, and approve the 2025 IRP with the following conditions:

1. Require the Company, prior to the 2028 IRP, to file a report assessing system vulnerabilities to extreme weather and strategies to build resilience on its system.
2. Require the Company to work with stakeholders to establish a standardized process to make historic outage data readily available to local governments for use in resilience and emergency response planning.
3. Require the Company to make the following changes to the Company's proposed SPS Pilot Program:
 - a. Calculate any size limitations based solely on the maximum export capacity of the battery resources to Georgia Power's system, and increase the maximum size for commercial customers to at least 1 MW without regard to metered load;
 - b. Establish a short-term cumulative target of 50MW with no cap between program options together with a long-term target of 100MW and require Georgia Power to pursue an expedited process to request more capacity; and
 - c. Provide additional incentives for existing residential solar customers to "firm" existing solar on the grid and an annual incentive for all customers in both programs.

4. Require Georgia Power, in coordination with Commission Staff and other interested parties, to develop a full-scale, integrated, multi-technology virtual power plant (“VPP”) platform for Commission approval in or prior to the 2028 IRP.
5. Require the Company to make the following changes to the Clean and Renewable Energy Subscription (“CARES”) utility-scale and DG programs:
 - a. Waive or defer the Notice of Intent (“NOI”) fee for MUSH customers;
 - b. Reduce or waive the 1 MW peak aggregate demand minimum for MUSH customers participating in these programs;
 - c. Maintain and establish carveouts for MUSH customers in both subscription programs; and
 - d. Decline at this time to approve a reimbursement threshold or otherwise cap bill credits for the CARES program.
6. Adopt the Proposed DSM Case with minor modifications to allow for the continuation of the Automated Benchmarking Tool (ABT) and implement specified programmatic changes to drive further energy efficiency savings.

LEGAL STANDARD

The Rules of the Public Service Commission require that an integrated resource plan be “in the public interest,” and, if it is not, that the Commission reject the utility’s resource plan or provide an alternate plan. *See* Commission Rule 515-3-4-.01(2); 515-3-4-.06. An IRP that is not in the public interest should not be approved by this Commission.

ARGUMENT

I. Resilience Assessment and Improvements

Georgia Power’s system and customers face increasing risks from extreme weather and a changing climate. The Company has acknowledged that Hurricane Helene “caused the most damage to our system of any storm in history,”¹ leaving more than 1.5 million customers without power and resulted in extended outages for critical facilities, including hospitals and wastewater treatment facilities.² Although its impacts were unexpected and unprecedented, Helene was not an isolated event.

Since 2022, the Company has expended over \$1 billion responding to Hurricane Helene and other extreme weather events, which will ultimately be collected from ratepayers.³ Customers including local governments have also incurred additional costs from outages caused by these events despite the Company’s best efforts to respond in real time.⁴

To address reliability, the Company has requested an increased summer target reserve margin of 20%.⁵ Although the IRP includes proposed customer programs to promote customer-sited resiliency assets, it does not include or otherwise propose that the Company conduct a comprehensive study of its resilience needs. Nor has the Company otherwise completed any reports or analyses regarding the resiliency improvements of Georgia Power’s system following

¹ Tr. Vol. 1 at 472:14-20 (March 25, 2025); Coalition Ex. 1 at 2 (Attachment to Company Response to STF-DEA-2-6).

² Tr. Vol. 1 at 472:21-25; 473:18-22 (March 25, 2025);

³ As of March 2025, the Company reported that there were \$861.9 million in under-recovered storm damage costs. 2025 Direct Testimony of Aaron P. Abramovitz and Matthew S. Berrigan in Support of the Stipulation to Extend the Alternate Rate Plan at 7:19-27, Dkt. No. 44280.

⁴ See 2025 IRP Rebuttal Hr’g Recording at 6:52:59 (June 23, 2025) (Georgia Power witness Looney testifying that the cost relating to loss of life and economic costs from extended power outages could “easily end up in the billions of dollars”).

⁵ 2025 IRP Main Doc. at 39.

the impacts of Hurricane Helene.⁶ By engaging in proactive resilience planning and coordinating with local governments in these efforts, Georgia Power can prioritize investments in transmission and distribution resources that would provide the greatest benefit to the communities that they serve. This process would also help local governments and other community-serving institutions identify critical resilience needs and prioritize location-based investments in their own communities.

Utilities and regulators throughout the nation have recognized the value of such analyses. Some of the country's largest utilities, including Duke Energy, have conducted comprehensive resilience studies, and regulators in at least 14 states including Texas, Nevada, Louisiana, and Florida already require utilities to prepare and file resilience plans.⁷

The Coalition requests that Georgia Power be directed to prepare and file, prior to the 2028 IRP, a report assessing system vulnerabilities to extreme weather and strategies to build resilience in the aftermath of Hurricane Helene. As part of this process, the Company should hold at least three collaboration meetings with interested parties and incorporate their feedback on the report.

The increasing frequency of extreme weather events across the state and region makes it even more important that utilities such as Georgia Power take proactive steps to reduce the impacts and corresponding costs from these extreme weather events. The Stipulation to Extend the ARP recently approved by the Commission provides that Grid Investment Plan spending will not exceed

⁶ Tr. Vol. 1 at 475:18-476:11, 477:7-18 (March 25, 2025); 2025 IRP Rebuttal Hr'g Recording at 5:19:30 (June 23, 2025).

⁷ Direct Testimony of David A. Nifong on behalf of Georgia Coalition of Local Governments at 8:9-12 (hereinafter "Nifong Direct Testimony"); Duke Energy and Guidehouse, Climate Resilience and Adaptation Study, at 4 (December 2024), <https://www.duke-energy.com/-/media/PDFs/our-company/Climate-Resilience-and-Adaptation-Study-2024.pdf>; Josh Schellenberg & Lisa Schwartz, *Grid Resilience Plans: State Requirements, Utility Practices, and Utility Plan Template*, Lawrence Berkeley National Laboratory at 5 (July 2024), https://eta-publications.lbl.gov/sites/default/files/grid_resilience_plans_template_report_20240723.pdf.

50% of the levels previously approved by the Commission in the 2022 Rate Case.⁸ As the Company acknowledged, this reduction in funding may limit its ability to pursue further resiliency initiatives, which only increases the need for thoughtful and proactive planning for infrastructure investments.⁹

Georgia Power's witnesses testified that the preparation of a resilience plan was not necessary because the Company already considers system vulnerabilities through its current planning processes.¹⁰ However, these efforts fall well short of the comprehensive studies of resilience needs that have been prepared by peer utilities and do not allow for meaningful stakeholder input.¹¹

The Coalition also requests that the Company work with stakeholders to make historic outage data available to local governments for emergency response and resilience planning purposes. Although the Company maintains an online resource that allows customers to check the outage status for a given location in real-time, it does not offer a publicly available resource for customers to access historic outage data.¹² The Coalition requests that the Company work with stakeholders to establish a standardized process to make historic outage data available to local governments. Historic outage data for both individual government accounts and aggregated community data can help local governments identify the areas in their jurisdictions most prone to grid disruptions and prioritize those areas for resilience investments, including microgrids and resilience hubs. Local governments could also use historic outage data for hazard mitigation and emergency response planning purposes.

⁸ Joint Petition of Georgia Power Company and the Public Interest Advocacy Staff for Approval of the Stipulation to Extend the Alternate Rate Plan, Ex. 1 ¶ 11.a, Dkt. 44280.

⁹ 2025 IRP Rebuttal Hr'g Recording at 5:20:20 (June 23, 2025).

¹⁰ 2025 IRP Rebuttal Hr'g Recording at 5:26:20 (June 23, 2025).

¹¹ 2025 IRP Rebuttal Hr'g Recording at 5:26:20 (June 23, 2025); *see supra* n.7.

¹² Tr. Vol. 1 at 483:17-484:5 (March 25, 2025); Tr. Vol. 2 at 2930:22-2931:8; 2949:3-15 (May 24, 2025).

II. Customer-Sited Solar Plus Storage Pilot Program

While the Coalition supports the Company's proposed SPS Pilot Program, it requests that Georgia Power modify certain aspects of the pilot program to facilitate the participation of local governments and the residents that they serve.

A. Raise System Size Limits for Commercial Customers

The Company has proposed allowing commercial systems to be sized up to 250 kW or no more than 125% of metered load for commercial applications.¹³ The size limitation will be based on the maximum continuous output of the inverter to discharge power to the grid.¹⁴ Depending on the configuration of a solar plus storage system, the total of both the solar and battery export capacity may be used to determine the maximum size limitations, particularly in AC coupled systems.¹⁵

The Coalition requests that the Company be required to modify the size cap for commercial systems in the SPS Pilot in two ways.¹⁶ First, it should calculate any size limits based solely on the maximum *export* capacity of the battery resources to the grid. Second, it should increase the maximum size for commercial customers to at least 1 MW without regard to metered load. Local governments, including members of the Coalition, and other community organizations are establishing back-up power systems, microgrids, and resilience hubs to improve the resilience of our communities. Because of the 250 kW size limit for commercial systems to participate in the SPS Pilot, some of the resiliency projects being undertaken by Coalition members described in

¹³ 2025 IRP Main Doc. at 103.

¹⁴ 2025 IRP Rebuttal Hr'g Recording at 4:17:12 (June 24, 2025)

¹⁵ Direct Testimony of Blake F. Richetta on behalf of Georgia Coalition of Local Governments at 22:11-18 (hereinafter "Richetta Direct Testimony").

¹⁶ While the Coalition's recommendations focus on the system size limitations for commercial customers, the Coalition also supports Capital Good Fund's request to raise the system size limitation for residential customers in the SPS Pilot from 20 kW to 25 kW. Direct Testimony of Russ Bates on behalf of Capital Good Fund at 6:7-13.

Mr. Nifong’s direct testimony may not be eligible to participate in the program depending on the configuration of the system and metered load at the facility.¹⁷

This size limitation would also exclude other scalable “shovel ready” resilience projects being undertaken by other community organizations, including solar plus storage microgrids under development by African Methodist Episcopal (“AME”) Church. As Rev. Willie “Bo” Barber Jr. of Prospect AME Church explained during public witness testimony:

By enforcing the cap . . . the pilot program effectively excludes churches ready and willing to provide vital resilience services from participating in the program that would amplify their impact. This is a missed opportunity for everyone, including Georgia Power.¹⁸

Increasing the maximum size limitation to 1 MW, as recommended by the Coalition, would allow commercial customers with larger storage systems to participate in this program that would not otherwise be eligible to participate in the Company’s DER Customer-Owned tariff (“DCO-1”), which limits eligibility to distributed energy resources (“DERs”) with a nameplate capacity of 1 MW. The Company does not claim that increasing the maximum size limitation to 1 MW would impose an undue administrative burden or otherwise pose a risk to the reliability of the grid – only that it would be somewhat more efficient to keep the maximum project size to 250 kW.¹⁹

The Company’s stated desire for administrative efficiency must be balanced against the value that scalable, shovel-ready resilience projects can provide to the grid. While it may be incrementally more difficult for commercial customers with larger system sizes to interconnect, these customers, not Georgia Power, would be responsible for paying for any additional

¹⁷ Nifong Direct Testimony at 18:9-20.

¹⁸ 2025 IRP Rebuttal Hr’g Recording at 36:35 (June 24, 2025).

¹⁹ 2025 IRP Rebuttal Hr’g Recording at 4:21:38 (June 24, 2025) (Georgia Power witness Beppler conceding that that increasing the size limitation for commercial customers would not pose an “unreasonable burden” on the Company, but testifying that it would add “additional complexity, which would make [the SPS Pilot] more difficult to implement quickly”).

interconnection studies, upgrades, and corresponding administrative fees.²⁰ The Company has repeatedly emphasized that the purpose of the SPS Pilot is to seek input and feedback from the customer—but customers are already providing feedback now that the 250 kW limit is too low. The accelerated expiration of federal incentives for renewable projects under the pending federal budget reconciliation bill also makes it likely that the window of opportunity for some projects will close if they can't move forward in the near future.²¹ Finally, the consumer protection concerns raised by the Company with respect to residential customers building solar and storage systems that exceed their needs are not applicable to commercial customers, particularly local governments and community organizations engaged in resiliency planning.²²

The Company testified that commercial customers with a system size greater than 250 kW may still participate in the Customer Connected Solar Program (CCSP), which the Company plans to modify to allow for the use of battery storage.²³ However, CCSP may not be a viable alternative for many commercial customers because it does not provide upfront incentives to finance the investment in battery storage resources or offer the flexibility of a behind-the-meter resource.²⁴

B. Modify SPS Pilot Program Target

Georgia Power has proposed a cumulative target of 50 MW that is divided equally between the Company-Directed and Customer-Directed program options.²⁵ Georgia Power should establish a short-term cumulative target of 50 MW with no cap between programs together with a long-term target of 100 MW. To address the concerns raised by the Coalition and PIA Staff, the

²⁰ 2025 IRP Rebuttal Hr'g Recording at 4:26:00 (June 24, 2025).

²¹ 2025 IRP Rebuttal Hr'g Recording at 4:31:10 (June 24, 2025).

²² 2025 IRP Rebuttal Hr'g Recording at 1:47:10 (June 24, 2025).

²³ 2025 IRP Rebuttal Hr'g Recording at 1:45:30, 1:48:40 (June 24, 2025).

²⁴ See 2025 IRP Main Doc. at 105-06.

²⁵ 2025 IRP Main Doc. at 103.

Commission should require Georgia Power to pursue an expedited process to request more capacity.²⁶

C. Increase Incentives for Residential Customers with Existing Solar Installations

The Coalition commends the Company for its proposal to provide increased incentives for low-to-moderate income customers and MUSH customers in the SPS Pilot program. Local governments and other MUSH customers provide critical services to their communities, which can be severely impacted by disruptions to the electrical grid.

The Coalition requests that the Company also provide additional incentives for existing residential solar customers to “firm” existing solar systems by adding battery storage, as well as an annual incentive for all customers in both programs. Adding batteries to existing residential solar systems offers tangible benefits to the grid by converting a rooftop solar fleet to a firm, potentially dispatchable grid asset. And residential customers with existing solar systems are better positioned to participate in the proposed pilot program than customers without such systems, in part because the incremental cost of adding a battery is much lower than the total capital cost of a new solar plus storage system. Other utilities have recognized the benefits of this approach: as part of its Go Back Initiative, Rocky Mountain Power offers increased incentives to residential customers with existing solar as part of its solar plus storage VPP program with great success.²⁷

Consequently, the Company should increase the incentives for residential customers with existing solar installations under the Company’s Proposed SPS Pilot from \$15/kW to \$45/kW in the Customer-Directed option and from \$750/kW to \$1,000/kW in the Company-Directed option. Qualifying existing residential solar customers would receive an incentive under both program

²⁶ Direct Testimony of Jamie Barber, Nick Cooper, and Richard F. Spellman on behalf of Public Interest Advocacy Staff at 54:19-55:1.

²⁷ Richetta Direct Testimony at 20:6-21:2.

options (company directed and customer directed), equivalent to the elevated incentive levels proposed for low-to-moderate income and MUSH customers under the Company's pilot program.

III. Virtual Power Plant Platform

Coalition witness Blake Richetta offered extensive, uncontroverted testimony about the potential benefits of a comprehensive VPP program to Georgia Power and its customers.²⁸ While the Coalition applauds the Company for coming forward with the SPS Pilot Program and undertaking investments in DERMS and Demand Response programs, the Coalition believes that additional directives from the Commission are needed to facilitate stakeholder engagement and the development of this valuable resource in advance of the 2028 IRP.

The Coalition therefore requests that the Commission direct Georgia Power, in coordination with Commission Staff and other interested parties, to develop a full-scale, integrated, multi-technology VPP platform for Commission approval in or prior to the 2028 IRP. This platform should incorporate existing programs, including Temp Check, and the successful aspects of recent and upcoming pilots, such as the residential and small commercial solar and battery storage, managed electric vehicle charging, and vehicle-to-grid program pilots, as well as other smart appliances. As part of this development process, the Company should hold at least three collaboration meetings with interested parties and incorporate their feedback into their filing.

IV. CARES Program

The Coalition requests several changes to make CARES utility-scale and DG programs more accessible to local governments and other MUSH. While the Coalition fully supports these programs, certain features of these programs make it difficult for MUSH customers to participate. To enhance participation in these programs and provide optimal benefits for Georgia Power and

²⁸ Richetta Direct Testimony at 29:19-30:12.

its customers, the Commission should direct Georgia Power to make the modest improvements recommended by the Coalition.

D. MUSH Carve-outs and Eligibility Limitations

The Company has set a minimum eligibility threshold of 1 MW aggregate peak demand for MUSH customers under the current utility-scale subscription program and C&I customers under the proposed DG subscription program.²⁹ As the Company acknowledges, many small local governments and other MUSH customers, including the City of Decatur, do not have an adequate aggregate peak demand to meet the 1 MW minimum threshold.³⁰ The Coalition requests that Georgia Power reduce the threshold to 500 kW or waive it entirely for MUSH customers.

The Coalition requests that the Company maintain the existing 50 MW carveout for the utility scale subscription program and create a 10 MW carveout in the proposed CARES DG subscription program for MUSH customers. Georgia Power testified that it had not yet made a final decision whether to maintain the existing 50MW carve-out for MUSH customers under the utility scale program.³¹ However, the Company testified that it did not plan to establish any carveout for the CARES DG subscription program.³²

These carveouts are necessary to provide MUSH customers with the time required to go through their respective review and approval processes, which may involve many stakeholders and be significantly more involved than the approval process for private-sector customers. Without these carveouts, MUSH customers run the risk that the program will become fully subscribed by private-sector customers.³³

²⁹ 2025 IRP Main Doc. at 98.

³⁰ Nifong Direct Testimony at INSERT; 2025 IRP Rebuttal Hr'g Recording at 3:55:50 (June 24, 2025); Nifong Direct Testimony at 15:11-14.

³¹ Tr. Vol. 2 at 966:23-967:20 (March 26, 2025).

³² Tr. Vol. 2 at 967:21-968:10 (March 26, 2025).

³³ Nifong Direct Testimony at 17:14-19.

E. Waiver or Deferral of NOI Fee

The Company plans to require all participants submit a one-time application fee of \$5,000 with their NOI fee in the utility-scale subscription program.³⁴ The Company plans to require all participants to submit an NOI fee in the DG program in an amount that has not yet been determined.³⁵

The Coalition requests that the Company waive or defer the NOI fee for MUSH customers, regardless of whether they are participating in the program within the MUSH carveout or within another segment, such as the Existing Load segment. Public sector entities like the members of the Coalition may be unable to make such an upfront payment due to budgetary constraints. As Mr. Nifong noted, the City of Atlanta previously had to pass legislation to accept a donation for the NOI fee to even apply for the program.³⁶ Moreover, as stewards of taxpayer dollars, municipalities may find it hard to justify spending thousands of dollars on a program with no guarantee of being selected to participate.

F. Decline to Impose a Reimbursement Threshold

The Company has proposed incorporating “reimbursement thresholds” for the hourly credit calculations in both the utility-scale and DG subscriptions, which could add risk for participating customers and create additional barriers to MUSH enrollment in CARES.³⁷ The Commission should decline to impose a reimbursement threshold or otherwise cap bill credits for the CARES program.

The hourly credit in the existing CARES program is already designed to capture the hourly per kWh costs of the Company’s incremental generation. Participating customers are already

³⁴ Tr. Vol. 2 at 961:7-11 (March 26, 2025)

³⁵ Tr. Vol. 2 at 972:2-13 (March 26, 2025)

³⁶ Nifong Direct Testimony at 16:3-4.

³⁷ Tr. Vol. 2 at 965:11-17 (March 26, 2025); 2025 IRP Main Doc. at 97.

required to pay a Renewable Integration Cost and Administration Fee to offset costs or burdens on non-participating customers.³⁸

The Company's concerns that future changes in avoided cost rates could result in a potential "windfall" for participating customers are unsubstantiated.³⁹ The Company has not prepared any methodology for this reimbursement threshold.⁴⁰ Nor has the Company come forward with any evidence indicating that the current CARES bill credit structure has failed to protect non-participating customers or would otherwise justify the imposition of a one-way allocation of risk on program participants. The Commission should decline to approve a conceptual reimbursement threshold for which the Company has failed to provide any methodology or detailed justification.⁴¹ Any reimbursement threshold or cap may be considered in subsequent proceedings, after the Company has more fully detailed and supported its proposal.

V. Approval of the DSM Proposed Case Programs

The Company's Proposed DSM Case achieves the DSM performance savings target of 0.75% required by the Commission's Order Adopting Stipulation in the Vogtle Prudency Proceeding.⁴² The Company projects that the Proposed Case will result in an additional 741 GWh of energy reductions annually and 224 MW of peak demand savings for the years 2026-2028.⁴³ The Company is also proposing to expand its DSM program offerings for income-qualified customers, which will provide meaningful benefits to the communities served by Coalition members.

³⁸ Nifong Direct Testimony at 16:13-15.

³⁹ 2025 Rebuttal Hr'g Recording at 1:24:40 (June 24, 2025).

⁴⁰ Tr. Vol. 2 at 966:10-21 (March 26, 2025).

⁴¹ Tr. Vol. 2 at 966:10-21 (March 26, 2025).

⁴² 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.

⁴³ Direct Testimony of Dr. Ross Beppler, Carley Goff, A. Wilson Mallard, and Andy Phillips on behalf of Georgia Power Company at 9:10-22.

The Commission should adopt the Proposed DSM Case with modifications to allow for the continuation of the ABT and implement programmatic changes to drive further energy efficiency savings. During a time of unprecedented projected load growth, achieving these energy savings will be critical to allowing new customers to interconnect to the grid at the least cost to ratepayers by avoiding or deferring costly transmission projects.

The Coalition supports the recommendations of Georgia Interfaith Power and Light and Southface Energy Institute for the Company to adopt best practices to achieve budget savings while meeting the savings target of 0.75%, including the exploration of financing opportunities such as on-bill financing and proposed expansion of the residential demand response program to include small commercial customers.⁴⁴

A. Continuation of Automated Benchmarking Tool

Consistent with PIA Staff's recommendation,⁴⁵ the Commission should continue the ABT program. The ABT provides commercial building owners with access to their aggregated whole building electricity usage data without significant barriers or costs.

The Company does not otherwise make this type of whole building information available to commercial building owners.⁴⁶ This tool also provides a valuable resource for commercial building owners that have multiple tenants to support compliance with benchmarking ordinances, including the City of Atlanta's Commercial Building Energy Efficiency Ordinance. Other local governments in the Coalition have plans to adopt similar benchmarking ordinances or building

⁴⁴ Direct Testimony of Stacy Sherwood on behalf of Georgia Interfaith Power & Light and Southface Energy Institute at 5:18-6:13.

⁴⁵ Direct Testimony of Jamie Barber, Nick Cooper, and Richard F. Spellman on behalf of Public Interest Advocacy Staff at 27:17-28:12.

⁴⁶ Tr. Vol. 2 at 985:11-15 (March 26, 2025).

performance standards and commercial building owners in those jurisdictions would similarly benefit from the continuation of this program.⁴⁷

B. Promotion of DSMWG

The DSMWG should work with Georgia Power to create a centralized resource of organizations, funding and financial support programs, and use cases, which could be made available to customers. This centralized, publicly available resource would help connect the ecosystem of organizations and programs that support and fund energy auditing, energy efficiency retrofits, as well as health and safety resources for the residential and commercial space.⁴⁸

C. On-Bill Financing for MUSH Customers

Georgia Power should offer on-bill financing for MUSH customers to facilitate adoption of energy efficiency measures. On-bill financing is an innovative way to facilitate the adoption of energy efficiency measures without having to resort to increased incentive levels that may result in more costs to ratepayers. Many electric utilities in Georgia and elsewhere in the Southeast, including Georgia Power affiliate Alabama Power, offer on-bill financing for energy efficiency projects.⁴⁹ The Company claims that “it is not prudent to offer on-bill financing due to the lack of success of the Residential Investment Saving Energy (“RISE”) Pilot and ultimate expense to customers.”⁵⁰ However, the lack of success of the RISE Pilot for income-qualified residential customers has no bearing on the success of an on-bill financing program that would be directed towards MUSH customers.

⁴⁷ Nifong Direct Testimony at 23:13-24:3.

⁴⁸ Nifong Direct Testimony at 26:1-15.

⁴⁹ Nifong Direct Testimony at 26:16-27:3; Environmental and Energy Study Institute, *Interactive Map of Utilities with On-Bill Financing* (last visited on May 2, 2025), <https://www.eesi.org/obf/map>.

⁵⁰ Rebuttal Testimony of Dr. Ross Bepler, Carley Goff, and Wilson A. Mallard on behalf of Georgia Power Company at 8:6-7.

CONCLUSION

For the reasons stated above and based on the extensive evidentiary record developed in these proceedings, the Coalition respectfully urges the Commission to approve Georgia Power Company's 2025 Integrated Resource Plan and related DSM filings only with the conditions and modifications outlined herein and in the Coalition's Proposed Ordering Paragraphs attached as Exhibit A.

These recommendations will help ensure that Georgia Power's long-term resource planning, customer programs, and resiliency efforts serve the public interest and provide meaningful benefits to all ratepayers, including local governments and the communities they serve. By directing the Company to implement targeted improvements to the SPS Pilot Program, support the equitable participation of MUSH customers in the CARES program, advance development of a full-scale virtual power plant platform, and continue and enhance DSM initiatives such as the Automated Benchmarking Tool and on-bill financing, the Commission can foster a more resilient, efficient, and inclusive energy system for Georgia.

The Coalition appreciates the opportunity to participate in these proceedings and respectfully requests that the Commission adopt its recommendations in full.

Respectfully submitted this 18th day of June, 2025

/s/ Benjamin L. Snowden
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EXHIBIT A

WHEREFORE, IT IS ORDERED, that the Company, prior to the 2028 IRP and in coordination with staff and other interested intervenors, prepare and file a report assessing system vulnerabilities to extreme weather and strategies to build resilience on its system. As part of this development process, the Company will hold at least three collaboration meetings with interested parties and incorporate their feedback in the report;

ORDERED FURTHER, the Company will work with stakeholders to establish a standardized process to make historic and annual outage data readily available to local governments for use in emergency response and resilience planning;

ORDERED FURTHER, the Company will modify the size limitations for participating customers in the Customer-Sited Solar Plus Storage Pilot (“SPS Pilot”) Program to increase the maximum size for commercial customers to at least 1 MW without regard to metered load and assess compliance with size limitations based solely on the maximum export capacity of the battery resources to the grid;

ORDERED FURTHER, the Company will establish short-term cumulative target of 50MW with no cap between program options together with a long-term target of 100MW and the Company will develop and propose to the Commission for approval an expedited process to request additional capacity in connection with its compliance filing;

ORDERED FURTHER, the Company will increase the incentives for residential customers with existing solar installations installed as of the effective date of the tariff under the Company’s SPS Pilot from \$15/kW to \$45/kW in the Customer-Directed option and from \$750/kW to \$1,000/kW in the Company-Directed option.

ORDERED FURTHER, the Company will, in coordination with Commission Staff and other interested parties, develop a full-scale, integrated, multi-technology virtual power plant (“VPP”) platform for Commission approval in or prior to the 2028 IRP. The Company will hold at least three collaboration meetings with interested parties and incorporate their feedback in the development of the platform;

ORDERED FURTHER, the Company will waive or defer the Notice of Intent application fee for Municipal, University, School, and Hospital (“MUSH”) customers in the Company’s Clean and Renewable Energy Subscription (“CARES”) utility scale and DG programs, regardless of whether they are participating in the program within the MUSH carveout or within another segment, such as the Existing Load segment;

ORDERED FURTHER, the Company will reduce the peak aggregate demand minimum from 1 MW to 500kW for MUSH customers participating in the Company’s CARES utility-scale and DG programs;

ORDERED FURTHER, the Company will maintain the existing 50 MW carveout for MUSH customers in the CARES utility-scale subscription program, create a 10 MW carveout in the proposed CARES DG subscription program, and increase the proposed targets for the utility scale and DG subscription programs to account for these carveouts.

ORDERED FURTHER, the Company will not impose a reimbursement threshold or otherwise cap bill credits for the utility-scale and DG CARES subscription programs;

ORDERED FURTHER, the Company’s Proposed Case DSM Program is approved as filed with the following adjustments set forth in this Order;

ORDERED FURTHER, the Automated Benchmarking Tool (ABT) will continue for the 2025-2028 program cycle as approved in the 2019 IRP at a preapproved cost of \$600,000.

ORDERED FURTHER, the Demand Side Management Working Group (“DSMWG”) will continue in its current form and be involved in the development of future DSM programs in the same manner as it has operated in past IRP cycles. The Company will work with DSMWG to create a publicly available resource of organizations, funding and financial support programs, and use cases prior to the 2028 IRP; and

ORDERED FURTHER, the Company will, in coordination with Commission Staff and other interested parties, will prepare and submit for Commission approval an on-bill financing program for MUSH customers. The Company will hold at least three collaboration meetings with interested parties and incorporate their feedback in the program.

CERTIFICATE OF SERVICE

I do hereby certify that I have this 3rd day of July, 2025, served the following parties with the foregoing Post-Hearing Brief and Proposed Order on behalf of The Georgia Coalition of Local Governments, by electronic mail addressed as follows:

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This 3rd day of July, 2025.

/s/ Benjamin L. Snowden
Benjamin L. Snowden