

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

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

POST-HEARING BRIEF OF WALMART INC.

Walmart Inc. ("Walmart") respectfully submits the following Post-Hearing Brief to the Georgia Public Service Commission ("Commission") regarding Georgia Power Company's ("GPC" or "Company") request for approval of its 2025 Integrated Resource Plan ("IRP") and Application for Certification, Decertification, and Amended Demand Side Management ("DSM") Plan.

INTRODUCTION

On January 31, 2025, GPC filed its 2025 IRP and Application for approval of its Amended DSM Plan and Certification and Decertification of certain DSM Programs. With respect to its 2025 IRP, the Company provided the following summary, in relevant part:

The 2025 IRP contains an updated load and energy forecast, . . . with updates to the Company's growing pipeline of potential and committed large load customers. [GPC]'s risk-adjusted load forecast for winter peak demand from the winter of 2024/2025 through the winter of 2030/2031 reflects 8,205 megawatts ("MW") of load growth. The Company projects nearly 6,000 MW of load growth as early as the winter of 2028/2029. Over the next ten years—through the winter of 2034/2035—Georgia Power expects up to 9,400 MW of load growth.

Through 2031, Georgia Power projects a capacity need of 9,000 MW, which it plans to address through the actions approved in the 2022 IRP and 2023 IRP

Update, as well as the incremental requests proposed in this 2025 IRP . . . Key elements . . . include extensions for existing resources, upgrades of existing resources, hydroelectric ("hydro") modernization, and flexible renewable resource procurement, including seeking to add up to 4,000 MW of incremental renewable resources to the electric system by 2035.

The Company conducted a Reserve Margin Study to determine the necessary target reserve margins ("TRM") to support System reliability. As approved in prior IRPs, the Reserve Margin Study supports the continued use of seasonal planning. The Company recommends maintaining the current 26% long-term Winter TRM for the System and proposes to increase the Summer TRM to 20% . . .

The Company updated the Renewable Integration Study . . . [which] indicates that significant increases in solar penetration can be achieved while maintaining appropriate levels of reliability for the System and finds that the cost of integrating renewable resources can be significantly reduced by adding flexible resources, such as BESS . . .

[GPC]'s supply side strategy leverages expansion, extension, and investment in existing units while seeking to issue RFPs for additional resources to meet customer needs. The Company's supply-side strategy proposes to continue the operation of Plant Bowen Units 1-4, as well as the extension of six existing units previously granted decertification, to preserve operating capacity. Further, the Company is seeking approval for upgrade projects at 14 existing gas and nuclear units, as well as continued investment in 43 hydro units at nine plants as part of the Company's hydro modernization plan. Georgia Power seeks to issue an All-Source RFP in 2025 for resources to come online in 2032 and 2033. The Company also proposes enhancements to its renewable procurement processes to include a more flexible RFP process that supports additional renewable resources to meet customer subscription demand . . .¹

With respect to its DSM Plan, the Company provided testimony, in relevant part, as follows:

[GPC's DSM] plan was developed in accordance with the Commission-approved DSM Program Planning Approach, per Commission orders, and in collaboration with the DSM Working Group ("DSMWG"). The Company developed four DSM cases in this case: the Proposed Case, the DSMWG Advocacy Case, the Supply-Side Case, and the Capacity and Affordability Case. The Company supports the adoption of the Proposed Case, which includes a DSM savings target of at least 0.75% of annual retail sales as required by the Commission's Order Adopting Stipulation in the Vogtle Prudency Proceeding in Docket No. 29849 ("Vogtle Prudence Order") . . .

¹ Direct Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson and Francisco Valle (GPC Main Panel) (Feb. 28, 2025), p. 8, line 21 to p. 11, line 4.

In support of its Proposed Case, the Company is seeking Commission approval for its DSM Action Plan, including (i) approval for a certificate of public convenience and necessity for one new residential DSM program, (ii) decertification of three previously certified DSM programs, (iii) amended certificates for four previously certified DSM programs, (iv) a waiver of the TRC requirement for four previously certified DSM programs, and (v) updated program economics for all other previously certified DSM programs. Approval of these DSM programs is projected to result in, on average, approximately 224 megawatts ("MW") of peak demand reduction and 741 gigawatt hours ("GWh") of energy reductions annually for 2026–2028. Although the economics of these programs are complicated, the Company continues to support offering DSM programs that minimize upward pressure on rates and maximize economic efficiency, especially as those programs contribute to high customer satisfaction . . .

[T]he Company is proposing enhancements to its Utility Scale and Distributed Generation ("DG") renewable procurement processes. For both the Utility Scale and DG requests for proposals ("RFP"), the Company proposes new processes such as a submission refresh process to allow RFP participants the option to "buy down" the total cost of their submission, as well as offering extended RFP periods, which will maximize opportunities for project selection and procurement to meet customer renewable subscription needs. For Utility Scale RFPs specifically, the Company proposes adding flexible Required Commercial Operation Dates ("RCOD") and will continue to consider the use of operational tools and flexibility as solutions to support interconnection viability for projects. For DG RFPs, the Company proposes to make the energy procured through these RFPs available for subscription and seeks to include solar resources coupled with dispatchable storage as part of the procurement process. The Company also proposes to incorporate locational value to DG resources evaluated during Georgia Power's DG RFPs. With these enhancements, the Company is seeking to procure energy from up to 4,000 MW of new renewable resources by 2035, beginning with 1,000 MW from Utility Scale Resources through an RFP in 2026, and 100 MW from DG resources . . .

For the Clean and Renewable Energy Subscription ("CARES") Utility Scale program, the Company proposes refinements to its Notice of Intent ("NOI") process, adding greater flexibility, and modifying its pricing methodology to reduce financial risks to non-participating customers. The Company also seeks to expand the CARES program to offer subscriptions to DG resources that are procured through [GPC]'s DG RFPs.

The Company seeks approval of the new Customer-Sited Solar Plus Storage Pilot Program, which will enhance options for customers interested in installing renewable resources at their premises. The Company also seeks to modify the existing Customer Connected Solar Program to add storage resources, increase the size of eligible facilities, and allow customers without billing history to participate.

..

[GPC] is seeking to modify the [Distributed Energy Resource ("DER")] Customer-Owned Program to allow contract terms up to 15 years. Otherwise, the Company is working closely with customers to move forward with projects in these programs and on its DER tariffs. In this 2025 IRP, the Company is proposing the Large Customer Owned Resiliency ("LCOR") Program, which is aimed at transmission-connected [commercial and industrial ("C&I")] customers. This program allows participants to retain ownership of their DER assets while providing [GPC] operational certainty that the assets will respond when called upon.²

On May 2, 2025, Walmart filed the Direct Testimony and Exhibit of Lisa V. Perry ("Perry Direct Testimony"). In Walmart's pre-filed Direct Testimony, Ms. Perry addressed "the Company's proposed 2025 [IRP], in which the Company is seeking . . . approval of new generation resources, power purchase agreements ("PPAs"), new distributed energy resource ("DER") programs, and a new curtailable load, or demand response ("DR") program."³ Ms. Perry's testimony discusses "opportunities for customers to provide resources that can help the Company meet its increasing customer demand."⁴ Walmart recommended that the Commission:

- (1) ". . . require the Company to collaborate with interested stakeholders to continue the development of a robust portfolio of programs that fosters broad participation and fully integrates advancing and emerging technologies capable of delivering clean, reliable, and cost-effective energy, including, a program similar to its Customer-Sited Solar Plus Storage Pilot Program for its larger commercial customers. . ." and
- (2) ". . . require the Company to address affordability concerns of its customers with the implementation of its Proposed Case in light of cost information that the Company has provided in these consolidated Dockets."⁵

The Commission conducted Hearings on March 25-28, 2025 (Company Direct Testimony), May 27-30, 2025 (Public Interest Advisory Staff ("Staff") and Intervenor Direct Testimony), and June 23-24, 2025 (Company Rebuttal Testimony). Ms. Perry testified on May 28, 2025.

² Direct Testimony of Dr. Ross Beppler, Carley Goff, and A. Wilson Mallard (Feb. 28, 2025), p. 5, line 20 to p. 8, line 15.

³ Perry Direct Testimony, p. 3, lines 8-14

⁴ *Id.*, p. 3, lines 14-16.

⁵ *Id.*, p. 3, line 19 to p. 4, line 4.

ARGUMENT

Walmart supports the Company's proposed expansion of its CARES program.⁶ In addition, Walmart backs the Company's request for approval of a new customer-sited solar plus storage pilot program for residential and small commercial customers, as well as the Company's request for approval of a new resiliency program for large C&I customers, the LCOR Program.⁷ Moreover, as part of Walmart's commitment to supporting cleaner, more affordable power for all customers, Walmart endorses collaboration with the Company and other customers to advance community solar and customer-sited supply solutions.⁸ Recognizing the "critical importance of offering a comprehensive and flexible suite of options to encourage broad customer participation," Walmart encourages the Company's efforts to develop demand side resources, such as energy efficiency ("EE"), DR, and customer resiliency programs, such as the proposed LCOR Program and Customer-Sited Solar Plus Storage Pilot Program.⁹

At the same time, and in light of the Company's testimony at the Hearing on March 26 2025, that Scenario 1 – 111 MG0, the Company's "base case," is not the least cost, and will cost customers "billions," and would result in "significant upward pressure on rates," Walmart also raised concerns regarding the affordability of the Company's proposals. Walmart's and other Intervenor's concerns regarding affordability were heard by the Company. Following the Hearing on Staff and Intervenor Direct Testimony, on May 19, 2025, the Company and Staff filed a Joint Petition to Extend the Alternate Rate Plan ("ARP") from the Company's 2022 rate case in Docket No. 44280 ("Joint Petition"). Per the Joint Petition, "[b]y extending the ARP, base rates will not

⁶ *Id.*, p. 10, line 6 to p. 11, line 5.

⁷ *Id.*, p. 11, line 6 to p. 12, line 6.

⁸ Perry Direct Testimony, p. 12, line 7 to p. 13, line 13.

⁹ *Id.*, p. 13, line 14 to p.14, line 9.

be changed and customer rates will remain stable and predictable."¹⁰ On June 12, 2025, Walmart filed Direct Testimony regarding the Joint Petition, and informed the Commission in its Direct Testimony and at the June 26, 2025, Hearing that "Walmart does not oppose Commission approval of the Joint Petition."¹¹ Therefore, when the Company files its next rate case, affordability issues related to the Company's 2025 IRP may be addressed.

RECOMMENDATION

Walmart recommends that the Commission require the Company to "collaborate with interested customers to continue the development of a robust portfolio of programs that fosters broad participation and fully integrates advancing and emerging technologies cable of delivering clean, reliable, and cost-effective energy," including development of a program for larger commercial customers similar to its proposed Customer-Sited Solar Plus Storage Pilot Program.¹² In addition, Walmart recommends that the Commission address any affordability issues related to the Company's proposals in this Docket be addressed in the Company's next base rate case.

[SIGNATURE APPEARS ON FOLLOWING PAGE]

¹⁰ Joint Petition, p. 2.

¹¹ Direct Testimony of Steve W. Chriss, Docket No. 44280, (filed June 12, 2025), p. 6, lines 3-5. Walmart understands that approval of the Joint Petition is pending before the Commission at the time of this submission, and further understands that if the Joint Petition is approved, the Company's next rate case would be postponed until 2028 or later.

¹² Perry Direct Testimony, p. 14, line 12 to p. 15, line 8.

Respectfully submitted this 3rd day of July, 2025.



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CERTIFICATE OF SERVICE

I do hereby certify that I have served the following parties with the foregoing **POST-HEARING BRIEF OF WALMART INC.** via electronic mail as follows:

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